CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 Oceangate, Suite 1000
ng Beach, CA 90802-4302
562) 590-5071

W21n

Filed:	11/9/01
49th Day:	12/28/01
180th Day:	5/18/02
Staff:	PE-LB
Staff Report:	1/18/02
Hearing Date:	2/5-8/02
Commission Action:	

STAFF REPORT: REGULAR CALENDAR

APPLICATION NUMBER: 5-01-432 RECORD PACKET COPY

APPLICANT: California Department of Transportation

AGENTS: Stephanie Reeder; Aziz Elattar; Ron Kosinski

PROJECT LOCATION: Route 90 from Coastal Zone boundary to halfway between Culver Boulevard and Mindanao Way, a point 1,934.7 feet west of the westerly edge of the proposed bridge over Culver Boulevard, Palms District, City of Los Angeles, Los Angeles County.

PROJECT DESCRIPTION: **As originally submitted:** Construct a 58.6-foot wide, four-lane, 436-foot long bridge over Culver Boulevard that would be partially located within the coastal zone; extend Route 90 Freeway 1,934.7 feet west of the westerly edge of the proposed bridge, install two 38.4 foot wide 1934.7 foot long ramps in the 31.8 acre undeveloped median between Route 90's present east and westbound roadways to connect the bridge to existing roadways that now extend between Culver Boulevard and Mindanao Way. The project would fill 0.23 acres of freshwater wetlands (streambed) and temporarily impact 0.09 acres wetland and riparian areas, create 0.73 acres of new wetland areas on site, remove invasive plants; re-connect wetlands and drains to Marina Drain, and, after the fact: demolish sports club, retail pottery store and RV/boat storage facility.

As amended by applicant: Bridge Alternative
Bridge the two ramps over the existing wetland in place of filling, maintain the current design of the proposed bridge over Culver Boulevard.

SUMMARY OF STAFF RECOMMENDATION:

Staff is recommending **APPROVAL** of the revised project (the bridge alternative) with conditions. The applicant has provided an alternative to the original design that eliminates the 0.23 acres of wetland fill and 0.9 acres of temporary wetland impacts. This alternative bridges the ramps over the wetland and avoids all fills, but does shade a tenth of an acre of wetlands (Bridge Alternative). Caltrans staff considered a second alternative (the East Alternative) that does not involve any impact on wetlands, but, in the view of Caltrans staff, Caltrans' internal review committees would reject the East Alternative because the slopes and turn radii do not conform to statewide safety standards. Staff is recommending approval of the Bridge Alternative because, based on Caltrans staff statements, it is most likely to be built. While according to the senior staff biologist, John Dixon, shading can have severe impacts on wetland productivity, in this case, the applicant has proposed

adequate mitigation: the restoration of 0.73 acres of wetlands by deepening a ditch, installing wetland plants, removing invasive plants from the entire median strip, and revegetating the median strip with native plants. Staff is recommending approval with conditions concerning removal of existing invasive plants, the installation and monitoring of the plants in the median strip and in the restoration areas, the control of siltation during construction and protection of water quality after construction, the control of project lighting, and the provision of biological and archaeological monitors during construction. The removal of invasive plants directly upstream from Area C Playa Vista will have a beneficial effect on restoration efforts in Area C, if any take place, and on other areas down stream of this site. The applicant has provided a feasible alternative that would be less environmentally damaging than the project originally proposed, and has also proposed mitigation measures that protect and restore the biological productivity of the sensitive resources that have been identified on site. **The motion to carry out the staff recommendation is found on page 4.**

APPROVALS RECEIVED:

1. Categorical Exclusion CEQA, Caltrans
2. Department of Fish and Game 1601 permit (Streambed alteration agreement Notification Number 5-265-00, 6/27/01)
3. City of Los Angeles Department of Public Works
4. California Regional Water Quality Control Board, Los Angeles Region, Conditional Certification for proposed State Route 90/Culver Boulevard Fly-over project (Corps Project 2000-06124-PJF), unnamed tributary to Ballona Creek, Marina del Rey, Los Angeles County (File No. 00-133) (401 Conditional Certification)

STAFF NOTES:

A. COASTAL ZONE BOUNDARY. The project is located on state-owned land located in the City of Los Angeles. Not all of the project is located in the Coastal Zone. The Coastal Zone boundary follows a projection of the northeastern side of the Alla Road right-of-way, connecting to the Pacific Electric Railroad right-of-way, then running east along the northerly edge of the right-of-way and from there to the southerly edge of the Ballona Creek Channel (Exhibit 2). The northerly half of the Culver Boulevard/Route 90 intersection is outside the Coastal Zone, but the east bound Route 90 roadway and the southerly half of the intersection and most of the Route 90 median area are located inside the Coastal Zone. About half of the proposed bridge and a sliver of presently undeveloped median are not in the Commission's jurisdiction, however most of the median strip west of Culver is located in the Commission's jurisdiction, as are the westerly ramps and the proposed wetland fill and restoration. Exhibits 1 and 2 show depictions of the location of the Coastal Zone in this area. The proposed development that is located within the Coastal Zone requires a coastal development permit.

B. 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.

I. STAFF RECOMMENDATION:

Staff recommends that the Commission **APPROVE** the permit application with special conditions

MOTION: ***I move that the Commission approve Coastal Development Permit No. 5-01-432 pursuant to the staff recommendation.***

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not 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 complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. STANDARD CONDITIONS

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

III. SPECIAL CONDITIONS.

The permit is approved subject to the following special conditions:

1. RESTORATION AND LANDSCAPING PLAN.

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT** the applicant shall provide, for the review and approval of the Executive Director, a detailed restoration plan for the entire area of the median strip. The plan shall identify the following areas: (a) wetlands and restored wetlands, (b) upland areas, (c) manufactured slopes. The design shall provide for an area outside the wetland for the placement of energy dissipaters and fossil filters to absorb and filter run-off from the bridge before it drains into the wetlands identified in Exhibit 6. The design shall reflect the current mixture of native plants and will as much as possible use plant species found in Ballona wetland and nearby upland habitats and will as much as possible use cuttings and seed stock from native plants found in the Ballona area.

(1) Initial assessment. The applicant shall submit for the review and approval of the executive director, a brief initial assessment describing the soil type and vegetation now found in the median strip and in the waterways at present and that is likely to exist on the site after completion of the construction of the road. The assessment shall include
   (a) An evaluation of measures necessary to remove invasive plants and a schedule of removal,
   (b) The effect on soils of the proposed grading;
   (c) Measures to assure the soils in the manufactured slopes will be appropriate for planting,
   (d) Measures to assure that the restored wetland will be appropriate for wetland plants, and the amount of water to be expected,
   (e) The amount and duration of irrigation necessary to maintain the project,
   (f) The measures that might be necessary to control invasive plants at the beginning of the project and after its completion, and
   (g) Measures necessary to prevent siltation and erosion from the site while plants are establishing.

(2) Habitat Goals. Prior to preparing the landscaping plan and restoration plan, the applicant shall provide a statement of habitat goals prepared by a biologist or licensed landscape architect experienced in restoration for the review and written approval of the Executive Director. The general goals of the plan shall be to provide support habitat for birds and insects found in the area presently or in the past. The goals shall establish a minimum coverage of each type of plant community, including no less than 0.73 additional acres of wetland or hydrophytic plants than now occur on the

median strip. Plans and notes shall also indicate the goals underlying the choices of any other plants shown for upland and manufactured slope landscaping and indicate the habitat function of the proposed vegetation--the animals and other plants expected to benefit from the presence of the vegetation.

Based on the habitat goals approved by the executive director, the applicant shall submit for his or her review and approval a restoration and landscaping plan and schedule of installation consistent with these goals. Based on the applicant's initial plans, the plans shall be consistent with the following basic habitat goals:

(a) Wetlands. The applicant shall provide detailed plans for restoration of the wetland areas identified in Exhibit 6. These areas shall be restored as freshwater wetlands. The design shall address hydrology, residence time of water, seasonal fluctuations or water levels and the accommodation of storm water.

(b) Upland areas landscape plan. The upland areas shall be planted with a mixture of saltbush scrub and coastal sage scrub that tolerates intermittent irrigation. The plants shall be consistent with Caltrans standards for view impacts and fire resistance.

(c) Manufactured slopes. The manufactured slopes shall be planted with low-lying individuals of the coastal sage scrub and saltbush scrub community that are fire resistant.

(3) After Executive Director approval of the plan in concept, the applicant shall provide detailed plans and notes that show the location of plants, sizes of container plants, density of seeds if seeds are used, expected sources of seeds and container plants, a schedule of installation and a statement describing the methods necessary to install and maintain the restored areas the kinds and frequency of maintanance expected to be necessary in the long term.

(4) Based on the information in the plan and the initial assessment, the applicant shall prepare a monitoring schedule, providing (a) a plan for removal of invasive and non-native plants identified in the initial assessment, (b) an initial report upon completion of initial planting, no later than the first day of December of the year in which the bridge is opened to traffic, to verify that the plants have been installed according to the approved plan, (c) no fewer than two additional reports in the first year after completion of the initial report, and (d) no fewer than one report in each subsequent year for no less than 5 years. The reports shall contain a brief description of the condition of the plants, the degree of coverage and the survival rate of various plants, either photographs, maps or illustrations and recommendations concerning activities necessary to

achieve the stated "Habitat Goals" discussed in section 2 above, and if the planting is not consistent with the goals, suggested measures to remedy the situation. The applicant shall, at the appropriate season, replant to remedy any deficiencies noted in the monitoring reports, and remove any invasive or non-native plants that have established on the site.

(5) Maintenance: In addition to the elements noted above, the plan shall include a manual for maintenance methods and a plan for training maintenance employees in the needs of the plants on the plant palette and on the identification of invasive plants;

(a) A list of chemicals proposed to be employed and methods for their application. Said chemicals shall not be toxic to fish or wildlife or persistent in the environment. Herbicides shall be applied by hand application or by other methods that will prevent leakage, percolation or aerial drift into adjacent restoration areas. Pursuant to this:

- An Integrated Pest Management Program (IPM) shall be designed and implemented for all of the proposed landscaping/planting on the project site. Because the project is located within the immediate watershed of Ballona wetland, alternatives to pesticides including, but not limited to, the following shall be employed:
  - Bacteria, viruses and insect parasites may be preferable to pesticides.
  - Weeding, hoeing and trapping manually.
  - Use of non-toxic, biodegradable, alternative pest control products.

(b) Where pesticides and/or herbicides are deemed necessary in conjunction with the IPM program, the list of pesticides and their application methods shall be included in the plans or reported in writing to the executive director. In using pesticides, the following shall apply:

- All state and local pesticide handling, storage, and application guidelines, such as those regarding timing, amounts, method of application, storage and proper disposal, shall be strictly adhered to.
- Pesticides containing one or more of the constituents listed as parameters causing impairment of the receiving waters for the proposed development (the Ballona Freshwater Marsh; Ballona wetlands, Ballona Creek and Ballona Creek Estuary) on the California Water Resources Board 1998 303 (d) list, or adopted updates of this list shall **not** be employed. Products that shall not

be employed are those listed above or any determined by the Department of Fish and Game to be deleterious to the habitat or wildlife of the wetland.

B. The permittee shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. The Executive Director may approve minor changes. No significant changes to the approved final plan shall occur without a Coastal Commission approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is required.

2. EROSION AND SEDIMENT CONTROL PLAN.

A. The applicant and its contractors will prevent any discharge of solids, earth, silt or harmful materials including fuels, debris or construction materials into the wetland or wetland restoration areas identified in Exhibit 6 or into other wetlands. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the applicant shall submit for the review and written approval of the Executive Director an Erosion and Sediment Control Plan outlining appropriate Best Management Practices to limit, to the maximum extent practicable, erosion and sedimentation during construction. Due to the sensitive location of the project, the plan must meet the following criteria:

(1) The plan will delineate the areas to be disturbed by grading or construction activities and will include any temporary access roads, staging areas, and stockpile areas. Both the stockpile areas and the wetlands shown in Exhibit 6 shall be staked, fenced and the location of the fencing approved by Executive Director. These wetland areas shall be clearly delineated on the project site with 4-foot high hazard fencing consistent with special condition 4 below.
   (a) To the maximum extent practicable, construction shall occur in stages that limit the length of time that the soils are uncovered at any one time. Pursuant to this condition, Caltrans shall provide a staging plan as part of its Erosion and Sediment Control Plan.
   (b) The plan shall specify that no grading shall take place during the rainy season (October 15 through April 1).
   (c) Applicant shall use, install or construct temporary drains and swales, gravel, sandbag barriers, fiber rolls, and silt fencing as appropriate. Applicant must also stabilize any stockpiled fill and cut or fill slopes with geotextiles or mats and close and stabilize open trenches as soon as possible. These erosion measures shall be required on the project site prior to and concurrent with the initial grading operations and maintained throughout the development process to minimize erosion and sediment from runoff waters during construction and the establishment of the restoration plantings.

(2) The plan shall also include temporary erosion control measures should grading or site preparation cease for a period of more than 30 days.

Temporary measures shall include, but are not limited to, stabilization of all stockpiled fill, access roads, disturbed soils and cut and fill slopes with geotextiles and/or mats, sand bag and gravel bag barriers, silt fencing; temporary drains and swales and sediment basins. Given the sensitivity of adjacent habitat, sediment basins are not sufficient to capture sediment. They must be accompanied by more stringent means of controlling sediment in close proximity to marshes and wetlands.

(a) No sediment shall be discharged into the wetlands identified in Exhibit 6 or the Marina Drain,

(b) Trucks and equipment shall not be allowed to track mud or other materials onto roads per methods outlined in Caltrans BMP CD29A (2), Caltrans Storm Water Quality Handbook, or an equivalent measure required by Los Angeles City Department of Public Works.

(3) The applicant shall test soils for toxicity during excavation according to DTSC rules and RWQCB rules.

(a) If toxic deposits are identified, other than non-water soluble aerially deposited lead, the toxic material shall be removed and transported to an appropriate disposal site approved for contaminants that may be discovered in the material. The site shall be an approved disposal site located outside the coastal zone.

(b) No toxic material excavated shall be stockpiled on site for more than 24 hours.

(c) Aerially deposited lead discovered during the excavation of the site shall be handled according to DTSC rules. If the lead is water-soluble, it shall be hauled offsite. If it is not soluble, it may be properly capped and used under the improved roadway if consistent with DTSC approvals.

(d) The Applicant or its contractors shall not use lead-contaminated materials from off-site as road fill.

(e) Airborne particulates shall be controlled consistent with the rules of the Air Quality Management District.

B. The permittee shall undertake development in accordance with the approved final plans and with this condition. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

3. CONSTRUCTION AND POST-CONSTRUCTION WATER QUALITY MANAGEMENT PLAN.

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT** the applicant shall provide for the review and written approval of the Executive Director a Water Quality Management Plan. This plan shall include a list of best management practices to reduce and control the amount of polluted runoff that is discharged into the Marina Drain, Ballona Creek, Ballona

Wetland, or any other waterway. Pursuant to this requirement, the plan shall include:

1. Construction BMPs
   (a) All trash and debris shall be disposed in the proper recycling or trash receptacles at the end of each day.
   (b) All stock piles and construction material shall be covered and enclosed on all sides, shall be located as specified in Special Condition 2, above, but in addition, as far away as possible from the wetland areas identified on Exhibit 6, drain inlets, or any other waterway, and shall not be stored in contact with the soil.
   (c) Vehicles shall be refueled offsite.
   (d) Asphalt demolished from the site shall be removed within 48 hours. Asphalt shall not be stockpiled.
   (e) Contaminated sediments discovered during construction shall be permanently removed from the site and transported to an appropriate offsite disposal facility.
   (f) Staging areas shall include impermeable berms to catch fuel spills.
   (g) Spills of all solid and liquid materials shall be immediately cleaned up; clean-up materials shall be disposed of properly. Dry spills should be swept, not washed or hosed. Wet spills on impermeable surfaces shall be absorbed, and absorbent materials shall be properly disposed. Wet spills on soil shall be dug up and all exposed soils properly disposed.
   (h) Apply concrete, asphalt, and seal coat during dry weather to prevent contaminants from coming into contact with stormwater runoff.
   (i) Cover storm drain inlets and manholes when paving or applying seal coat, tack seal, slurry seal, fog seal, or similar materials.
   (j) Always park paving machines over drip pans or absorbent materials, since they tend to drip continuously.

2. Post Construction BMPs
   (a) Maintain, to the maximum extent practicable, post-development peak runoff rate and average volume at levels that are similar to pre-development levels; AND
   (b) Reduce post-development loadings of Total Suspended Solids (TSS) so that the average annual TSS loadings are no greater than pre-development loadings; OR
   (c) If the goal established in subsection 2b is not feasible, after construction has been completed and the site is permanently stabilized, reduce the average annual TSS loadings by 80% (for

the purposes of this measure, an 80% TSS reduction is to be determined on an average basis and should not result in TSS lower than the pre-development level).

(d) Install an appropriate suite of source control and structural treatment BMPs to achieve the above-stated goals. Structural treatment BMPs shall be designed to treat, infiltrate, or filter the amount of stormwater runoff generated by any storm event up to, and including the 85th percentile, 24-hour storm event for volume-based BMPs, and/or the 85th percentile, 1-hour storm event, with an appropriate safety factor, for flow-based BMPs.

(e) BMPs must include intermediary catch basins, hydrocarbon filtration devices, and trash filters sized according to the above specifications.

(f) Install energy dissipaters at the outlets of all discharge points.

(g) Monitor and maintain all structural and non-structural BMPs, including, but not limited to, hydrocarbon filters, energy dissipaters, trash racks, and catch basins according to manufacturers' specifications and according to the regional climate. Such procedures shall occur at a frequency as specified by the manufacturer, where appropriate, and no less than a 30-day interval during the rainy season (October 1 – April 1).

(h) Regularly patrol the area for discarded containers, trash, and other materials likely to blow into or otherwise impact adjacent wetlands or Ballona Creek.

(i) Otherwise comply with the orders of the RWQCB for large paved areas.

B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

4. STAGING AREAS FOR CONSTRUCTION

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT**, the permittee shall submit a construction staging plan for the review and approval of the Executive Director. The plan will indicate that the construction staging area(s) will not encroach on, nor drain into wetlands areas and will be set back no less than 25 feet from all wetlands. Plans shall also include detailed methods for bridging the wetlands identified in Exhibit 6 that will minimize disturbance to the wetland and the areas immediately adjacent to wetlands. The plans shall as much as possible keep heavy equipment 25 feet outside of any wetland except when actually needed for

bridging and construction. Wetlands are those designated by the United States Army Corps on Engineers (1989) by the State of California or as identified in Exhibit 6.

(1) The plan shall include:
   (a) Designated area for staging and storage
   (b) Methods to minimize disturbance of areas within 25 feet of wetlands,
   (c) Construction equipment access corridor for work that must occur closer than 25 feet of any wetland areas;
   (d) The wetland areas noted in Exhibit 6 above as currently existing or as identified for restoration will be fenced prior to construction. The applicant will place sandbags and/or plastic on the outside of the fence to avoid siltation into these areas.

   (e) A site plan that depicts:
      - Limits of the staging area(s);
      - Construction corridor(s);
      - Construction site;
      - Location of construction fencing and temporary job trailers;
      - Location of stockpile areas;

   (f) A temporary runoff control plan consistent with Condition 3, above.

B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

6. FINAL PLANS FOR BRIDGE ALTERNATIVE.

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit for the review and approval of the executive director final engineers drawings for the Bridge Alternative generally shown in exhibits 6 and 11. Plans shall include detailed methods for bridging the wetlands identified in Exhibit 6 that will minimize disturbance to the wetland and the areas immediately adjacent to wetlands.

7. BIOLOGICAL MONITOR.

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, and again before any vegetation is disturbed; a biologist whose qualifications have been reviewed and approved by the Executive Director shall survey the site and prepare a report to the Executive Director concerning the presence of (1) any rare plant, (2) nesting birds. If a nesting bird is found within or immediately adjacent to the footprints of the excavation or of the staging areas, the work shall not proceed

until the qualified biologist certifies that the chicks have fledged and that the work will not disturb the birds. If any rare plant is found within the footprints of excavation or of the staging areas, the permit shall not issue until a mitigation plan is provided for the review and approval of the Executive Director.

The mitigation plan shall consider avoidance, or salvage and replanting within Area B or C Ballona and shall recommend the option with the least disturbance. Any replanting in areas not subject to a currently valid coastal development permit that includes revegetation shall require an amendment to this permit or a new permit. All reports shall be filed in the Commission office prior to issuance of the permit and again prior to the start of work.

In addition to confining the work to the approved excavation areas, the applicant shall place visible orange plastic 48-inch high temporary fences around the area in which the any rare plant has been identified and will **keep out and prevent** excavation, stockpiling, and the entry of vehicles or storage of equipment in this area. A biological monitor shall remain on site throughout the earthmoving operations. A copy of the Biological Monitor's reports shall be provided to the Executive Director.

A. The permittee shall undertake development in accordance with this condition. Any proposed changes to the approved biological monitoring procedures shall be reported to the Executive Director. No changes to the approved biological monitoring procedures shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

8. DISPOSAL OF HAZARDOUS MATERIAL DISCOVERED DURING CONSTRUCTION.

PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT the applicant shall provide for the review and written approval of the Executive Director a contingency plan that has been reviewed by the RWQCB for testing of excavated materials for contamination and disposal of any contaminated hazardous materials that may be discovered during construction. If over-excavation is required, the applicant shall inform the Executive Director for a determination of whether an amendment to this permit is required. The plan shall identify testing protocols, supervision and sites approved for disposal that are outside the coastal zone. Material shall not be stockpiled on site more than 24 hours.

B. The permittee shall undertake development in accordance with the approved final plan and schedule and other requirements. Any proposed

changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required. All stockpiles shall be located within the disturbed areas noted in Special Condition 1.

9. PROJECT LIGHTING.

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT** the applicant shall provide lighting plans for the review and written approval of the Executive Director. The plans shall provide :

(1) Illumination shall be at the lowest levels allowed in federal and state standards for secondary highways.

(2) All lights shall be directed so that spillover outside the right of way shall not exceed ten feet.

(3) No night work or night construction lighting shall be permitted.

B. The permittee shall undertake development in accordance with the approved final plans. Any proposed changes to the approved final plans shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

10 ARCHAEOLOGICAL RECOVERY

A. **PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT,** the applicant shall provide evidence for the review and written approval of the Executive Director that the reviewing agencies (The United States Army Corps of Engineers and the State Historic Preservation Officer) have determined that no further investigation of the sites in the vicinity of the approved bridge project is required. The "vicinity" means within 100 yards. If cultural deposits or grave goods (as defined by SHPO) are uncovered during construction, work must stop until the archaeological monitor and the Native American monitor can evaluate the site and, if necessary, develop a treatment plan that is consistent with the programmatic agreement. A qualified archaeological monitor shall be present on the site during all project grading. If human remains are found, the Commission requires that the applicant carry out identification and recovery or reburial consistent with State Law.

IV. FINDINGS AND DECLARATIONS:

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION AND LOCATION

The applicant proposes to construct a four-lane bridge on Route 90 (the Marina Expressway) over Culver Boulevard, and to extend freeway lanes to approximately halfway between Culver Boulevard and Mindanao Way. Route 90 is a State Highway that extends from Lincoln Boulevard across the 405. Caltrans representatives describe Route 90 as extending to the City of La Habra, a city located approximately 20 miles inland. Most of the route, such as Slauson Boulevard, the portion of the route that lies directly east of the 405 freeway, is not developed as an expressway. In this part of its length, Route 90 connects the 405 freeway to Lincoln Boulevard. From the 405 to Culver Boulevard, Route 90 is a freeway. From its intersection with Culver Boulevard to Lincoln, Route 90 is not a freeway. While it is commonly identified as the Marina Freeway, Route 90 is not a freeway within the Coastal Zone because there are signalized intersections at Culver Boulevard, Mindanao Way, Alla Road and Lincoln Boulevard. Within the Coastal Zone portion of the project site, Route 90 is developed with two westbound lanes and two eastbound lanes separated by a (approximately) 330-foot wide, 2,950-foot long median. 9.74 acres of the 38.52 acre median between Culver Boulevard and Mindanao Way was previously occupied by several businesses, all but one of which have been asked to vacate. 10.05 acres are already developed with streets. The remaining 18.83 acres of the median is not developed and is vegetated by a mixture of native plants (saltbush scrub community), invasive species such as pampas grass, and several drainage ditches that support freshwater marsh plants. (Exhibits 6 and 7) A survey conducted by Psomas Associates in 1995 identified a total of 1.81 acres of state wetlands and 0.99 acres of Corps jurisdictional wetlands within the median between Culver Boulevard and Mindanao Way. In mid-September 2001, the Commission staff biologist field checked the delineation of the wetlands and confirmed that it was accurate. The applicant initially proposed, as requested in its 1601 permit (Exhibit 13) to fill 0.23 acres of wetlands and cause temporary impacts on 0.09 acres of wetlands, and to mitigate that fill by restoring additional wetlands within the median. The applicant has identified an area in the median where 3:1 restoration can be provided.

The originally proposed wetland fill was a result of ramps that extended into two ditches that now exist in the median. As a result of conversations with the staff, the applicant now proposes to bridge over the wetland areas. It also considered a second possible alternative design for the ramp that would not require wetland fill:

> **"Bridge Over Wetland Alternative**
>
> This alternative maintains the current proposed design and includes placing a bridge over the existing wetland in place of filling in this area. See Figures B-1 to B-5 for details. Therefore, no filling of the wetlands would be necessary. Temporary impacts (~0.13 acres) would result from the area the equipment would need to place the footings and pilings to stabilize the bridges. The project construction costs, due to the construction of the bridges less the reduction of embankment,

would be expected to increase by roughly $1 million relative to the current proposed design. The duration of construction would also increase by a couple of months to allow for proper settlement of the anticipated poor soil conditions in the vicinity of the footing supports.

Although no filling of the wetlands would be necessary, there would still be some permanent impacts. Since the bridge structures would be nearly an at grade structure, the wetland would be subject to the affects of shading. The close vertical proximity of the bridges to the ground will create indirect and permanent shading impacts to wetland areas and their plant community. The decrease in sunlight to a wetland area affects the plant composition and diversity. Wetland plants that are very dependent on sunlight (such as cattails) will not survive in shaded areas and will, therefore be replaced with species that are more shade tolerant (mugwort, annual grasses, and forbes). The biomass and diversity of the plant community would decrease and the plant structure would become simplified. It also decreases the temperature of the soil, impacting the type of vegetation that grows." (Caltrans 2002)

(Staff note: the Bridge Alternative will average 7.5 feet and 8.5 feet above the present wetlands, resulting in shading of a tenth of an acre of wetlands. However, the number of safety issues raised by the East Alternative makes it unlikely to be capable of being constructed. For additional information on alternatives including maps, see Exhibits 9-12.)

"East Alternative

A second alternative to the current design would involve merging the connector ramps with their respective frontage roads prior to the existing wetland to avoid any impact. The connector ramp split moves towards Culver Boulevard relative to the current proposed design. .... No filling of the wetlands would be required for this alternative. The project construction costs would reduce by approximately $500K due to the shorter length of the connector ramps....

However, a significant concern with this alternative is an increase in both the quantity and scale of required design exceptions needed. This could create an unsafe driving environment, since this is at the end of a freeway and vehicle speeds are expected to be excessive in this zone. Some significant exceptions may be required. This is primarily a result of the short distance from the Culver Undercrossing Bridge to the merge with the frontage roads and the amount of horizontal and vertical separation between the two fixed points. This creates substandard stopping sight distances, which reduces the reaction time a driver has to react to upcoming obstacles or unexpected road conditions. Another result is the tightness of the horizontal curvature of the connector to tie into the frontage road. Again, since the speeds at the end of the freeway are expected to be on the high

side, the ability of the driver to handle the tight curve without leaving the roadway is hindered." (Caltrans, February 17, 2002)

(Staff Note: the "East Alternative" would require special safety exception from a management level team. If approved by the Commission, District 7 staff would need to request its management to approve this alternative.)

Additional project description. The present project is the first phase of a project that would ultimately link Route 90 Expressway directly with Admiralty Way in the Marina del Rey and complete the Expressway's development as a limited access, high-speed route between Lincoln Boulevard and Route 405. This phase of the project (the distance between Centinela Boulevard and Mindanao Way) is 7,910.476 feet or about a mile and a half. The length of the median from Culver Boulevard to Mindanao Way is approx. 2,950 feet (a little over half a mile), all but a corner of which is located within the Coastal Zone (Exhibits 1 and 2). In preparing for the project, the applicant removed certain structures and uses that have been allowed to operate within the median as interim uses of the right-of-way. .These include a boat storage operation, a pottery store and an athletic facility. 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 like this is designed to function and be useful independently, and indefinitely, with or without the completion of the next phase. There is currently no funding available or budgeted for the next phase.

The wetlands are located within and adjacent to a drainage ditch that connects with several municipal storm drains that drain the developed area to the north of the project and discharge into the Marina Drain at the southern edge of the right-of-way. The ditch runs the length of the median strip between Culver Boulevard and Mindanao Way, generally parallel to the roadway, but widening near its intake from a major drain to the north (the Marina Drain) and also at its discharge to the south (again at the Marina Drain.) (Exhibits 6 and 7.) As noted above, the applicant originally proposed, as requested in its 1601 permit, to mitigate its filling of 0.23 acres of wetlands or, now with its amended project description to mitigate impacts of the either the Bridge Alternative" of the "East Alternative" by restoring additional wetlands within the median. As required by the Department of Fish and Game, the applicant proposes to remove ice plant and pampas grass on the site, most of which is located within the wetlands, and create 0.73 acres of freshwater marsh along a secondary drainage ditch located on the southern edge of the median (Exhibits 6, 7 and 13). (The ice plant and pampas grass dominate the wetland portion of the median strip.) The proposed marshes would also be linear, freshwater marshes and would continue to be fed by urban storm drains. According to the applicant, the restored wetland and habitat would remain in place and would not be removed as a result of the construction of subsequent phases of the planned Expressway. The project will require 17,800 cubic yards cut and 119,000 cubic yards fill and will take about a year and a half to complete. 100,900 cubic yards will be imported.

B. PROJECT BACKGROUND

The applicant, the Department of Transportation, (Caltrans) contends that the purpose of the project is for public service, which they assert is an allowable purpose for wetland fill under Section 30233. Caltrans representatives contend that the road is required to accommodate existing and future volumes of traffic on the West Side of Los Angeles, especially on Lincoln Boulevard. The West Side varies in definition, but can be loosely defined as the part of the City of Los Angeles that lies west of La Cienega, south of the Santa Monica Mountains, north of the Airport and that extends to the Pacific Ocean. In a letter provided to the Coastal Commission staff, Aziz Elatter, Senior Environmental Planner for Caltrans outlines the reason for this proposal:

> **"Purpose and need of the project.**
>
> The project is proposed to relieve traffic congestion and improve safety by extending the Route 90-freeway section across Culver Blvd. It is needed to address existing and forecasted congestion levels due to the increased development in the area. The project will also alleviate congestion-related accidents that are expected to increase as congestion increases, should this project not be developed.
>
> **Traffic.**
>
> Traffic volumes are projected to increase significantly along Route 90 due to on-going and planned development as well as regional growth to the extent that design year traffic demands are projected to substantially exceed capacity at a number of intersections without improvements. Currently there are over 200 proposed developments in the general area of the Route 90 Corridor, which include Playa Vista (Phase I and II), the Marina del Rey Local Coastal Plan update and the LAX Master Plan. " Elattar, Letter, Exhibit 18.

When questioned about the need for the project based on existing traffic, instead of needs projected for recently approved and proposed projects, Caltrans representatives responded with information that they consider illustrates present congestion levels, and thus, present need. This includes volume/capacity statistics concerning the present level of service (LOS) at the Route 90 and Culver intersection. In a letter to staff, Caltrans representatives state that in the morning peak hour, the present level of service is LOS D (Eastbound) and C (Westbound). In the evening peak hour, the level of service is LOS E (Eastbound) and LOS F (Westbound). Caltrans representatives explain that these levels of service indicate that presently, the intersection is over or near capacity (Exhibit 18.) They indicate that operating at this level of congestion leads to accidents (Exhibits 17, 18).

The applicant's representatives contend that the bridge is necessary to maintain the existing "capacity" (flow rates) because traffic levels will increase without any specific future project and there are additional projects, many of them outside the Coastal Zone, that are expected to further increase demand. They also argue that the bridge is

necessary to accommodate traffic from projects that have been approved and are vested that will add to the traffic levels at this and other intersections. Once these approved projects are occupied, they argue, the congestion at this bridge will rise from over and near capacity to extremely over and at capacity (Exhibits 20-21). Caltrans staff's response to questions about the need for the project seemed consistently to address traffic impacts from existing and future projects as well as impacts from approved and vested projects and proposed, but not finally approved, projects. However, in looking at the statistics that Caltrans staff provided about present traffic levels, Culver and the Route 90 intersection is already near capacity in the eastbound lanes during the morning rush hour and over capacity in the westbound lanes during the evening rush hour. The Commission notes, however, that the present levels of service at this intersection, as reported by Caltrans, have actually improved over the 1990 levels of service as reported by the Playa Vista consultants, Barton Aschman and Kaku Associates, even without changes to this intersection. This raises questions about the need for the proposed project. Moreover, at a minimum, other, less environmentally damaging, improvements elsewhere in the system should be investigated before this particular improvement is approved.

The applicant has also provided a STIP (State Transportation Improvement Plan) spreadsheet indicating that Caltrans will pay for the project's construction. According to Caltrans, the City of Los Angeles is paying for the design work on this segment. These figures, the Caltrans representatives explain, mean that the road capacity increase is not required by any particular future project. (Exhibits 17 and 18).

Ronald Kosinski, Deputy District Director for Environmental Planning for Caltrans region 7, indicates that no one project is behind the demand for this project:

> "Caltrans has no specific master plan for this or any freeway/expressway. Caltrans' process indicates that as needs are identified, they are forwarded to the California Transportation Commission (CTC) for prioritization and funding. Because of the need generated by work and recreational congestion, this project has been funded as a highly needed project by the CTC. In addition, Caltrans is not in the real estate business, and is legally mandated by law to dispose of unnecessary real estate. This area was designated as needed for this project since it was built in 1972." (Ronald Kosinski, Deputy District Director Division of Environmental Planning, Letter, Sept 19, 2001, Exhibit 17)

Mr. Kosinski continues that given the present congestion of this intersection and the 2% per year annual ambient growth identified by the Southern California Association of Governments, this project is needed because of ambient growth. He acknowledges that a number of projects, including Playa Vista and the Airport expansion, will exacerbate the need for the project. However, he maintains, the project is needed because traffic has been increasing due to projects that have been already approved and constructed both inside and outside of the Coastal Zone. (Exhibit 17)

However, despite the applicant's contention, the City imposed traffic mitigation measures on Playa Vista based on the certified EIR for Playa Vista Phase I[1] slightly changed after they received comments from transportation agencies, including Caltrans[2]. Phase I is the portion of the Playa Vista project located outside the Coastal Zone. The City required the following mitigation measure:

> **Culver and Marina Freeway:** Guarantee construction of a 56-foot wide three lane westbound portion (or, as an interim measure, two lanes in each direction) of a grade-separated interchange at Culver Boulevard and the 90 freeway with a new freeway-lane striping easterly at a point beyond the Ballona Creek Channel Bridge, all to the satisfaction of Caltrans. Complete the eastbound portion of this interchange if funding is provided by other sources for this location. This would replace the Culver and Marina Freeway measure listed on Page V.L.1-94 of the Draft EIR (Staff note: See Exhibits 15-17.)

The project before the Commission is substantially identical to the project required by the City in its tract conditions for Playa Vista Phase I. This project consists of the bridge portion of a grade-separated interchange at Culver and the Marina Expressway, and new freeway lane striping at a point easterly of the Ballona Creek Channel Bridge. The applicant states that the City of Los Angeles is paying for the engineering and design work, and that Caltrans will pay for the bridge construction out of its budget. The mitigation measures proposed in the draft EIR require Playa Vista to pay for the bridge design, but not its construction. However, when the City approved the final EIR and the tract map, it imposed the condition quoted above, which required Playa capital to guarantee construction of the bridge.

Caltrans representatives state that Caltrans, in fact is paying for construction and that Caltrans would not pay for the construction if the only source of demand for the project were one development. Phase One Playa Vista will impact the intersection and its traffic impacts need to be mitigated, but even without Playa Vista, the applicant claims, the intersection would need to be improved.

Caltrans representatives continue that Playa Capital[3] has obtained a Caltrans encroachment permit to "do work at Culver Boulevard ramps;" (to construct ramps to connect Culver Boulevard with the Route 90) however, this work is not part of this application. In November 2001, the Commission approved an application from Playa Vista to do this (see 5-00-382 and A-PLV-5-00-417). The Caltrans representatives state, but has not documented, that the need for the project may be exacerbated by the traffic impacts of Phase One Playa Vista, but that the project is otherwise needed to reduce

---

[1] (see Haripal Vir, Senior Transportation Engineer: "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),"

[2] 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

[3] Playa Capital LLC is the partnership that is proposing the Playa Vista project. The terms "Playa Capital" and "Playa Vista" are commonly used interchangeably.

traffic that is now using other routes from the 405 to Lincoln Boulevard. Levels of traffic, Caltrans points out, have been rising by about 2 percent per year on the West Side of Los Angeles for no reason that may be attached to any particular project but which represents general increases in destinations in the area and general population increases in greater Los Angeles (Exhibit 17.) Playa Vista needs the road, they state, but Playa Vista alone does not require the development of the road.

Information about traffic demands in related traffic reports. The draft Phase One Playa Vista EIR (1991) and the 1995 Entertainment District Amendment to the Phase One Playa Vista EIR that was completed in 1995 each include an analysis of area traffic. The 1991 EIR Appendix O was based on an update of an analysis prepared in 1983 by Barton Aschman associates. Kaku Associates (a traffic engineering firm) further updated the study in 1995, when Playa Capital was considering rehabilitating the old Hughes Aircraft Plant as an Entertainment Media and Technology Center. Kaku estimates that traffic in the area of the project has been increasing at about 4 percent a year. Kaku attributes 1.5 percent of the increase to "ambient growth" and the remainder to identified major projects. In the 1995 amendment to the Phase One Playa Vista EIR (Entertainment and Media District) Kaku acknowledges that some major projects discussed in the 1991 Draft EIR were never constructed; and, at the time of the 1995 amendment to Playa Vista's city permit, some new projects are under discussion. In spite of the withdrawal of some proposed projects, many projects are and have been anticipated on the West Side of Los Angeles. Kaku figures indicate that the intersection of Culver and the Marina Freeway was operating at LOS F in 1990 (at peak hours in one direction), and that traffic levels were expected to increase without the Playa Vista project. Level F if the most severe level of heavy traffic, where traffic is approaching gridlock (Exhibits 17-30.)

1997 Intersection Operating Conditions (source: First Phase Playa Vista Draft EIR)							
		Existing 1990		1997 without First Phase Playa Vista		1997 with First Phase Playa Vista	
Intersection	Period	V/C	LOS	V/C	LOS	V/C	LOS
	AM	1.323	**F**	1.679	**F**	1.719	**F**
	PM	0.943	**E**	1.265	**F**	1.281	**F**
Culver/Marina Freeway West bound ramps	AM	0.834	**D**	1.115	**F**	1.128	**F**
	PM	1.036	**F**	1.474	**F**	1.527	**F**

The level of service in 1990 was LOS E and D except for the evening westbound and the morning eastbound, when it exceeded capacity --level F. The 1995 Amendment to the Phase I EIR for Playa Vista, required for the development of an Entertainment and Media Center in Area D, analyzes the then current levels of service and the level of service anticipated without the Phase I Playa Vista project (ambient levels of growth) (Exhibit 22 and 28). This document anticipates that with Phase One Playa Vista, which is anticipated to generate about twice as much traffic as the other projects in the area combined, the level of service at Culver/Route 90 is anticipated to rise above capacity to level F. Level F

is defined as near- gridlock (Exhibit 20). The Commission notes, however, that Caltrans' more recent data shows improvement at these intersections.

The information provided by these studies consistent with Caltrans' contention that some improvement is necessary to maintain existing levels of service even without the Playa Vista project. The Commission notes that the study prepared by Kaku for the amendment to the Playa Vista Plan in 1995 assumes that each year traffic will go up by 1.5% instead of 2% as indicated by Caltrans (Exhibits 17-30).[4] However, the study assumes that the total growth from 1990 to 1997 would be 4 percent per year, based on the traffic generated by other projects that were approved or under consideration in the area. However, as noted above, the level of service at these intersections is shown as better in the 1995 study that was shown in 1990. It is unclear whether traffic had decreased between 1991 and 1995, or whether there were differences in the studies' methodology or the time of year at which they were conducted. Both studies show that the levels of service are high and approach gridlock at least at some peak hours. It is clear based on the information provided by Caltrans and others that there is a need for road widening or other measures to alleviate present traffic congestion. These and other measures will also be needed in the near future when already-approved and vested projects are occupied.

C. ENVIRONMENTALLY SENSITIVE HABITAT AREAS/ WETLANDS.

A spotty mixture of saltbush scrub and introduced plants dominates the 18.83 acres of the median strip that was not previously paved for the boat/recreational vehicle storage yard. (As noted above Caltrans estimates that the entire median strip, including the cross streets, is about 38.52 acres.) Parallel to the roadway, near the center of the median, there is a ditch that is fed from urban storm drains. The ditch supports grasses, reeds and cattails and other freshwater wetland plants.

The Commission staff biologist, John Dixon, visited the site on September 18, 2001. His evaluation follows:

> Route 90, Marina Highway: This project will impact small areas of existing man-made and degraded wetland. There is a ditch that carries urban runoff parallel to the highway and then curves south where it widens into a small freshwater marsh before entering a culvert. The California wetland delineation, as marked by stakes and tape, appears to include all stands of wetland vegetation. There is a great deal of exotic vegetation, such as pampas grass, that should be removed. (Dixon, 9/18/2001)

As noted above, a wetland delineation (Psomas, 1995) has shown that there are 1.81 acres of state jurisdictional wetlands on the site, some of which is open water. Within and

[4] The Commission also notes that the Kaku study shows the Culver Boulevard/Route 90 intersection more congested than Caltrans estimates in its recent letters (Exhibit 19 page 2).

adjacent to the inundated area, there is a large and vigorous stand of pampas grass. As the slope rises, there is "saltbush scrub" habitat, dominated by Saltbush (*Atriplex lentiforma*) and Coyote bush (*Baccharis pilularis.*) According to the Psomas survey, the area supports a number of bird species including the great blue heron, barn swallows, Allen's hummingbirds, American goldfinches, northern mocking birds, mourning doves and other common upland birds such as sparrows (Exhibit 13, 1601 permit.) The marsh is degraded and of limited habitat value. Nevertheless, it is a wetland as defined by the Commission's regulations and as confirmed by the Commission's biologist.

The applicant originally proposed to fill two sections of the marsh totaling 0.23 acres and to redirect water in those sections to underground culverts. In the original design, the fill is necessary to accommodate ramps that will connect the bridge to the existing travel lanes. In addition, the applicant has identified 0.09 acres of wetland that will not be filled, but that will be so close to the grading that they will suffer "temporary impacts." Originally the applicant stated that it is not feasible to elevate these ramps. Now the applicant has indicated that it is changing its request and that it is applying for one of its two alternatives. The alternative that it prefers, the Bridge alternative, will still have shading impacts on wetlands, but will not require fill. The other alternative has no direct impacts on wetlands, but raises safety issues, and for that reason may not, in the end, prove feasible. To mitigate the fill and the temporary impacts, of any version of its project, including the preferred Bridge Alternative, the applicant has proposes a mitigation program. The proposal is to create 0.73 acres of freshwater marsh on site (3:1 replacement for the actual fill) and is searching for an additional 0.19 acres within the watershed (to bring the total to 0.92 acres, or 4:1 mitigation.) The applicant has also proposed to remove the pampas grass that has severely impacted the productivity of the existing wetlands, and to increase the biological function of the wetlands. The proposed mitigation area would be a linear, freshwater marsh and would continue to be fed by urban storm drains.

The Department of Fish and Game has issued a streambed alteration permit for the fill conditional on the creation of mitigation area and on removal of the pampas grass (Exhibit 13). Both the created and the existing wetland areas drain to Area C Playa Vista through a conduit. The conduit under the Expressway road leaving the site is identified as the "Marina Drain" on the Caltrans plan, and would discharge to a patch of pickleweed that is located in the northwest corner of Playa Vista Area C.[5]

1. COASTAL ACT LIMITATIONS ON WETLAND FILL.

The proposed fill has not been justified under the standards of Section 30233 of the Coastal Act. Section 30233 of the Coastal Act provides for wetland fill under a limited set of circumstances. Section 30233 states in part:

---

[5] There are several drainages, all eventually discharging into the Marina, that are identified as the "Marina Drain" on plans provided to the Commission by different agencies. This drain is not in the same location as the "Marina Drain" identified in the Playa Vista and Marina del Rey LUP.

Section 30233

(a) 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:

(l) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.

(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.

(3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a degraded wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.

(4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.

(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.

(6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.

(7) Restoration purposes.

(8) Nature study, aquaculture, or similar resource dependent activities.

(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. ...

The proposed project must conform to all of the following for the Commission to allow fill of the wetland:

a) No feasible less environmentally damaging alternative exists;

b) Feasible mitigation measures have been provided to minimize environmental effects;

c) [The project] 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.

2. ALTERNATIVES

Before the Commission can approve fill, it must determine that there is no feasible alternative that is less environmentally damaging. Caltrans representatives assert that they have examined alternatives, and have now agreed to one of the alternatives that they have considered. Caltrans indicates that it has agreed to an alternative that does not fill wetlands, or that has minimal fill, but points out that this alternative, a bridge of the wetlands, would impact the wetlands through shading. A second alternative that would have no wetland fill does not conform to safety standards that address the tightness of turn's allowable grades. According to Caltrans representatives, this alternative, the "East alternative" is not likely to be approved by Caltrans management.

Logically, there are two classes of alternatives that Caltrans should analyze. There are two alternatives: (1) design alternatives, a change in the physical design of the ramps to avoid the wetlands, or (2) traffic re-routing or a change in modes. In response to an earlier version of this report, Caltrans has provided an analysis of each class of alternatives.

Design alternatives. Caltrans has investigated construction methods that would eliminate or significantly reduce wetland fill or impacts by either re-routing the off ramps, or by placing the ramps on pilings. The applicant has now proposed to adopt one of these alternatives. The ramps of the original project were designed to curve down 30 feet from the level of the bridge to the level of the current roadway. The ramps would have been supported on earth fill. Some wetland fill would have occurred where the berms supporting the ramps cross the ditches. This fill, marked "Fill of Corps Jurisdictional Wetlands", is avoidable by the installation of a small structure to bridge the ditch (Exhibits 6-12).

The applicant's representatives assert that only the crosshatched areas were to be filled as a result of the originally proposed project. After the fill, the water from the drains would be piped under the berms . The areas that would have been be filled are not large, but there are feasible, less environmentally damaging alternatives, that are approvable under Section 30233. Therefore Caltrans has abandoned its origin design.

To avoid or significantly reduce wetland fill, the applicant now proposes to place the ramp on pilings where it crosses the federal and state wetlands (wetland cross-hatched on Exhibit 6, see Exhibit 11). This bridge alternative will not require wetland fill, but would, as indicated below, result in profound permanent shade of about 0.10 acres of the wetlands that under the roadways (Exhibits 4, and 11). Caltrans Deputy District Director, Ron Kosinski indicates that Caltrans would be willing to accept the "East Alternative" if so conditioned by the Commission. (Exhibit 4). There is one alternative that would avoid all wetlands impacts, but that particular alternative, characterized as the "East" alternative below, does not conform to Caltrans safety standards, and would require an internal Caltrans review board to grant design exceptions. Such design exceptions would require speeds to be reduced.

2. CALTRANS ANALYSIS OF 07-LA-90 CENTINELA AVE TO MINDANAO WAY IMPROVEMENTS: CONNECTOR RAMPS - ALTERNATIVES ANALYSIS

Introduction

The purpose of this report is to provide an Alternative Analysis for the design of the Connector Ramps that will link the Route 90 freeway with the eastbound and westbound frontage roads. Aside from the currently proposed design, several alternatives were studied and are included, along with their pros and cons, in this report. One alternative moves the design west of the current proposed design towards Mindanao Way. A second alternative moves the alignment to the east of the current design. A third option was included for the current design to "bridge over the wetland" instead of filling the wetlands.

West Alternative

One alternative that was considered involved merging the connector ramps from the bridge over Culver Boulevard to the existing one-way frontage roads further to the west (closer to Mindanao Way) of the current proposed design. In this case, the connector ramps do not split until after the perpendicular section of the wetland. See Figures W-1 to W-7. This design approach not only still impacts the perpendicular section, it also impacts the longitudinal portion of the wetland (parallel to the frontage road) from the connector merge into the westbound frontage road. As a result, this alternative would increase the wetland impacts, both permanent and temporary. The quantity of fill for this alternative covers an approximate are of 0.31 acres (compared to 0.17 acres for the current proposed design). This area of fill would permanently impact the wetlands. An additional temporary impact due to construction would be 0.30 acres (compared to 0.15 acres). At a 4:1 ratio, the required mitigation is estimated at 1.24 acres. Due the lengthening of the connectors in the easterly direction the project cost would increase from the current proposed design by roughly $500k. The construction duration would increase from approximately 10 to 12 months.

One advantage to moving the alternative west would be a reduction of standard design exceptions. This would provide a safer interchange configuration for the project. However, this would come at the expense of a higher construction cost and a significant increase in wetland impacts. In addition, this alternative was previously modified to the current proposed design to satisfy the visual and noise requirements set forth by the local residents.

East Alternative

A second alternative to the current design would involve merging the connector ramps with their respective frontage roads prior to the existing wetland to avoid any impact. The connector ramp split moves towards Culver Boulevard relative to the current proposed design. See Figures E-1 to E-5 for details. No filling of the wetlands would be required for this alternative. The project construction costs would reduce by approximately $500k due to the shorter length of the connector ramps. And the duration of construction in this area of the project would be expected to reduce by a few months as well. The biological impacts would be minimal, if any.

However, a significant concern with this alternative is an increase in both the quantity and scale of required design exceptions needed. This could create an unsafe driving environment since this is at the end of a freeway and vehicle speeds are expected to be excessive in this zone. Some significant exceptions may be required. This is primarily a result of the short distance from the Culver Undercrossing Bridge to the merge with the frontage roads and the amount of horizontal and vertical separation between the two fixed points. This creates substandard stopping sight distances, which reduces the reaction time a driver has to react to upcoming obstacles or unexpected road conditions. Another result is the tightness of the horizontal curvature of the connector to tie into the frontage road. Again, since the speeds at the end of the freeway are expected to be on the high side, the ability of the driver to handle the tight curve without leaving the roadway is hindered.

Bridge Over Wetland Alternative

Another alternative maintains the current proposed design and includes placing a bridge over the existing wetland in place of filling in this area. See Figures B-1 to B-5 for details. Therefore, no filling of the wetlands would be necessary. Temporary impacts (~0.13 acres) would result from the area the equipment would need to place the footings and pilings to stabilize the bridges. The project construction costs, due to the construction of the bridges less the reduction of embankment, would be expected to increase by roughly $1 million relative to the current proposed design. The duration of construction would also increase by a couple of months to allow for proper settlement of the anticipated poor soil conditions in the vicinity of the footing supports.

> Although no filling of the wetlands would be necessary, there would still be some permanent impacts. Since the bridge structures would be nearly an at grade structure, the wetland would be subject to the affects of shading. The close vertical proximity of the bridges to the ground will create indirect and permanent shading impacts to wetland areas and their plant community. The decrease in sunlight to a wetland area affects the plant composition and diversity. Wetland plants that are very dependent on sunlight (such as cattails) will not survive in shaded areas and will, therefore be replaced with species that are more shade tolerant (mugwort, annual grasses, and forbes). The biomass and diversity of the plant community would decrease and the plant structure would become simplified. It also decreases the temperature of the soil, impacting the type of vegetation that grows. (Caltrans 2002, full report and illustrations of alternatives in Exhibits 9 -12)

At the request of staff, Caltrans measured the distance between the bottom of the proposed bridges on the Bride Alternative, and estimated the area of wetlands that wold be permanently shaded under this alternative. The alternative would permanently shade a maximum of tenth o f an acre. The distance between the bottom of the bridge and the wetlands is shown in the following chart:

Connector	Least distance, in feet, from water surface to bridge	Greatest distance, in feet, from water surface to bridge	Average distance, in feet
A1 south side	7.9 feet	9.2 feet	8.5 feet
A2 north side	6.9 feet	8.2 feet	7.5 feet

Thus Caltrans asserts that it has considered alternatives and that there are feasible less environmentally damaging alternatives that also meets its cost and, and in one instance, safety objectives. The Commission finds that Caltrans' characterization of the physical orientation of the ditches to be accurate. It is true that the road will not block the flow of the stream, it is already intended to flow under the stream in a culvert. It is also true that shadows do impact wetlands, depending on how deep the shadows are and how long each day the shadows prevail.

With regard to the two alternatives with the least impacts on wetlands, Caltrans representatives state;

> "For the Bridge Alternative: we will be temporarily impacting 0.06 acres [which] will not be filled, [but which,] however, will be directly adjacent to the bridged wetlands. shading impacts to wetlands will be 0.10 acres. This [figure] was derived by extending a vertical line straight down over the edge of the bridge.
> For the East Alternative: we will have no temporarily, shading, or permanent impacts to wetlands.
> For both the Bridge Alternative and the East Alternative, Caltrans is proposing 0.73 acres of wetland enhancement (same plans, etc. that you saw for the previous

design) that can be used to mitigate for shadow impacts, temporary impacts, and which will provide water quality benefits.

Traffic re-routing or a change in modes. A different set of alternatives would include alternate routes or modes for traffic. Are there alternate routes that the traffic that presently congests this intersection could take, such as Jefferson, Manchester, or Washington Boulevards? What improvements could take place on any of those routes to improve capacity and attract commuters away from Culver Boulevard or the Marina Freeway? Secondly, are there feasible modal shifts, such as an express bus from the South Bay to one of the currently proposed light rail lines that would encourage enough modal shifts to reduce traffic? How much traffic would need to be reduced to maintain capacity? Even if only a small percentage of commuters would change their route or ride a bus, could that reduce levels of congestion enough to maintain levels of service? While traffic analysts may have already addressed many of these questions, none of this information was provided in this permit application.

In response, to this issue, Caltrans provided a page of its project report:

CALTRANS PROJECT REPORT ON ROUTE 90 BETWEEN MINDANAO WAY AND CENTINELA AVENUE

"Rejected Alternatives

The objectives of the proposed Project are to reduce projected future congestion levels and congestion-related accidents along Route 90 within the project area. No viable project alternatives, other than the proposed Project, have been identified which would satisfy the project objectives at a lesser cost. As discussed below, higher-cost alternatives were studied; however, they were determined to have greater right of way and/or environmental impacts or would provide less benefit relative to the proposed Project.

Under the "No Project" alternative, the interim interchange at Culver Boulevard would be built; resulting in a continuation of the at-grade signalized expressway intersections at this location. Likewise, the section of Mindanao Way between the two existing Route 90 roadways would not be improved -- instead retaining its present cross-section. Table 2 shows the results of intersection capacity calculations assuming the retention of the existing roadway cross-sections (i.e., the No Project alternative). As can be seen, all of the analyzed locations are projected to experience significant increases in V/C ratios with corresponding increases in congestion. This is especially true at the Culver/Route 90 location, where the No Project alternative would result in approximately one-half of the capacity needed to accommodate the projected future traffic demand.

Alternative designs and geometric configurations for the Route 90 improvements proposed as part of this Project were analyzed by the Caltrans Project Development Team (PDT) during the series of design workshops in November and December of 1995. The design alternatives considered at that time were determined to be infeasible, overly costly, or otherwise inferior to the proposed design and were rejected by the PDT. In addition, the mandatory Fact Sheet approved on February 29, 1996 determined that no incremental improvements were considered to be viable for the Project.

The alternative routes investigated for widening included Jefferson Boulevard, Washington Boulevard, and Venice Boulevard. Jefferson Boulevard will be widened from Route 1 to Centinela Avenue as part of the Playa Vista mitigation program. In addition, the Playa Vista mitigation program includes improvements at key intersections along the Jefferson Boulevard corridor. However, capacity constraints at the Jefferson Boulevard/I-405 interchange limits the effectiveness of these improvements when it comes to connecting Jefferson Boulevard to the regional freeway system. Major widenings along Washington Boulevard and along Venice Boulevard were determined to be infeasible due to residential and commercial land use impacts.

Interstate 10 (Santa Monica Freeway) has been studied for the addition of high-occupancy vehicle (HOV) lanes. Further widenings to add mixed-flow lanes appears infeasible due to right of way impacts and costs. Computer model simulations of a widened I-10 indicated that the widened facility would not divert enough trips away from the central portion of the study area to relieve congestion in the Route 90 corridor.

In summary, when compared to the proposed Project, the additional project alternatives evaluated above would have greater right of way impacts on residential and commercial uses

while providing less congestion relief. The proposed Project is therefore considered to represent the minimum project alternative." (Caltrans, 2001)

The Commission notes that the Route 90 Bridge is part of a plan for managing automobile traffic that takes the projected automobile traffic demand of the entire Playa Vista project and other related projects into account. It assumes that most people will use cars, which in Los Angeles, this year, and for the foreseeable future, is quite likely. A traffic alternative is based on the assumption that traffic does not have to go on Route 90. It assumes that Caltrans could re-route expected automobile traffic, build another road in another place, or Caltrans or other agencies could improve alternative modes of transportation. The consultant traffic engineer of on this project has stated that such an alternative is not likely (Exhibit 34).

The use of the Marina Freeway to divert traffic from Lincoln Boulevard and from the Jefferson Boulevard /405 ramps developed as a result of analysis of these Phase One mitigation measures developed in the First Phase Playa Vista EIR. However the bridge was envisioned in a 1982 study conducted by Barton Aschman for Los Angeles County on the behalf of Summa Corporation, the owner of Playa Vista at the time. In order to develop the numbers of units and amount of office space and other development that was proposed in 1982, it was necessary to accommodate people who would live or work there. Barton Aschman, a firm of traffic engineers, developed a detailed transportation plan for the sub-area including development as far east as the 405 freeway.

While this mitigation measure was one of several measures required for the entire development, the analysis for Phase I assumed that the traffic from Phase I was only the first of a number of very heavy demands on the system. Secondly, the near capacity status of Route 90 at the time of the 1991 survey provided justification for building the bridge independent of the impacts of the Playa Vista development.

All reports agree that it is possible to increase the capacity of Lincoln Boulevard, but the way to increase capacity would be to increase the capacity of intersections. One suggestion rejected was to widen intersections or provide a fly over (grade separation) at Lincoln and Washington. This was rejected because it would involve acquisition and demolition of business properties on that corner and placing a major road close to a residential neighborhood. Other alternatives, which Playa Vista has already employed, involve removal of on street parking in densely developed residential and commercial neighborhoods. The Commission has received no traffic impact reports that suggest different alternatives. The LAX expansion EIR simply states that impacts on Lincoln cannot be mitigated. Traffic analysis from EIR's, however, and from road building agencies analyze how to improve things in the short term. The easiest way to improve things in the short term is to increase the capacity of the existing system, which is automobile oriented.

The applicant's analysis of alternative transportation solutions does not discuss transit alternatives even though Caltrans had previously insisted on the acquisition of buses to provide no fewer than 300 bus trips along Lincoln Boulevard. When examining how to

move travelers with increasing levels of population, academics transit advocates and "big picture analysts" encourage a modal shift. The Coastal Act policies and the LUP also encourage this kind of alternative. Caltrans has not provided analysis of how other kinds of transportation would reduce traffic levels enough so that the bridge would not be necessary. They have also not provided an analysis that addresses what could be developed and why those alternatives may or may not work. The Commission notes that there may be a limit in the width and number of roads and cars that can be accommodated in the narrow coastal strip, which may make the development of an alternative system necessary. Alternative modes means bus possibly rail, possibly bicycles which would enable riders to go where they wanted to go, resulting in less automobile traffic. If such changes were enough to reduce automobile traffic, Caltrans would also not have to build the bridge. The major drawback of such an alternative is that to be a meaningful choice, alternative modes need to have much greater capacity than they now do and they must connect to greater distances at reasonable trip times.. A subregional mass transportation system is not in place and is not now a reasonable alternative.

The Commission finds that the least environmentally damaging feasible alternative is a physical alternative, the Bridge Alternative. While it is true that the "East alternative" involves less impact on wetlands, it is not obvious that the alternative would be feasible, or possible to construct under state safety standards. However shading a tenth of an acre of wetlands is much less environmentally damaging than filling 0.23 acres of wetlands–over twice as much. Therefore the Commission requires that the applicant prepare revised plans showing both the Bridge alternative and the East Alternative.

3. MITIGATION MEASURES

The applicant has proposed mitigation measures. These mitigation measures are described in more detail in the section on biological productivity. Basically the proposed mitigation measures for the Bridge alternative and for the original proposal would create a small linear patch of wetland in an area that is overwhelmed by introduced plants, many of which are invasive. Permits from other agencies require the removal of Pampas grass from the entire median strip, but do not specify what should be used as replacement. The applicant proposes to monitor the installation, but for only three years. In such an area, more than three years would be necessary to assure that the area remained or became biologically productive. There is no indication of what kind of plant will be installed in areas cleared by the project that are adjacent to the restoration area. Finally the applicant is planning to install notoriously invasive plants, including *Myoporum laetium*, adjacent to the coastal zone portion of its project and just outside the coastal zone boundary (on the east side of Culver Boulevard). Recently the staff inspected a site adjacent to Grand Canal in Venice (5-82-479) that was developed in 1982. As part of the 1982 project, the canal bank was cleared and re-seeded with natives. The project was located adjacent to an area where this plant, *Myoporum*, was used for landscaping. In subsequent years, the *Myoporum* has overwhelmed the plants that were initially installed. This and similar experiences leads the Commission to conclude when a proposed restoration area is adjacent to an area dominated by invasive plants, longer and more aggressive monitoring

is necessary to assure that the area functions as proposed. As described above, these mitigation measures are flawed, but as also noted below in the section of biological productivity, it would be possible to enhance the effectiveness of the project mitigation measures – by revegetating the entire median strip with freshwater wetland, coastal sage scrub and saltbush scrub vegetation, requiring a stage process, and increasing the monitoring time to five years.

The applicant has provided two feasible, less environmentally damaging alternatives. Because the applicant has demonstrated that it can (1) avoid fill of wetlands and that (2) there is one feasible alternative, and one alternative that might be feasible if it passes further safety review, and (3) that sufficient mitigation measures can be provided with minor changes to those proposed. the Commission finds that the development as now proposed is an allowable use under Section 30233 of the Coastal Act, and that the project can be approved with conditions related to the protection biological and water resources.

The Commission notes that the applicant's assumption that fill for a new road is an allowable use under Coastal Act Section 30233(a)(5) may be called into question. In the Bolsa Chica decision, the California appellate courts found that, barring certain circumstances that did not apply to the case; it was not allowable under the Coastal Act to fill wetlands except as provided for in Section 30233. In fact, the court specifically discussed the "incidental public service purposes" exception in Section 30233(a)(5) and said that "incidental public services are limited to temporary disruptions and do not usually include permanent roadway expansions" at all. Bolsa Chica Land Trust v. Superior Ct. (1999) 71 Cal. App. 4th 493,517. However, it did find that roadway expansions would be consistent with Coastal Act section 30233(a) (5) when "no other alternative exists and the expansion is necessary to maintain existing traffic capacity." Id. (See Exhibit 31.)

Since the applicant has provided alternatives that require no wetland fill, it is not necessary for the Commission to analyze the implications of the Bolsa Chica decision for this present case or to determine whether or not the circumstances of this project are consistent with what the court meant when it used the term "existing traffic capacity."

4. BIOLOGICAL PRODUCTIVITY.

Section 30231 of the Coastal Act requires the Commission to protect the biological productivity of coastal waters and streams.

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 applicant has provided a list of freshwater marsh plants that it proposes to install in and adjacent to the restored wetland. The plan notes an intention to use seeds and cuttings from the area, but does not include a detailed plan for salvaging plant materials. Effective restoration plans salvage plant materials so that they will be able to use natives from the area and from native seed sources. The plans note the use of "wildflower seeds" but do not specify the seed sources or the types of plants to be found in the mix, although the applicant has provided a list separately. While the applicant proposes to remove iceplant and pampas grass, the proposal does not include a discussion of the extent of the clearance, or a detailed protocol for removal of invasives. The plans do not map the area in which pampas grass is found nor do they specify that pampas grass will be removed from the entire site. Instead they map a small area in the median for restoration. The description says that pampas grass will be removed from the "creek area" or the "restoration area." The mapped "restoration area" (Exhibit 14) appears to be significantly smaller than he median strip. Pampas grass appears to extend outside the footprint of the "restoration area" (Exhibit 6, 7 and 14.) The "restoration " is confined to a relatively small area, so it is not clear what will be used to replant areas where pampas grass was previously found. In addition, the applicant's "landscaping program" which would be located on the frontage roads and also directly outside the coastal zone, includes a number of identified invasive plants, including Myoporum and ice plant, which might easily reinvade an area that is recently disturbed. In response to this comment, the applicant states that there is already a large area of myoporum outside the coastal zone, which it does not intend to replace, but which is showing bare patches, and which needs to be rehabilitated. Therefore the maintenance supervisor states, Caltrans is unlikely to be persuaded to remove the myoporum outside the coastal zone, because removing it would entail replacing myoporum now installed along several miles of embankment The applicant states that it will monitor the restoration, for three years, but if invasives predominate nearby, a longer period of monitoring will be necessary.

The purpose of a restoration plan is to put back plants of the particular community so that the birds and insects that had formerly occurred in that community can be supported. Insects are particularly are dependent on certain food plants and the most sensitive to the occupation of an area by plants that to which they are not adapted. Both the number of individuals and the number of species in an area define the biological productivity of that area. While to some extent the number of individual plants may rise as an area is colonized by an aggressive plant, the number of species in an area dominated by non - native invasive plants drops, and the number of native insects dependent on native plants and grasses also drops. The variety of plants found in the area drops. As a result of this change, the number of birds and other predators who eat the insects also decreases. Some plants, such as Myoporum, ice plant, or pampas grass spread so rapidly that they completely displace local wetland or wild land plants, and shade out certain kinds of habitat. If too small an area is restored, or if invasive plants are not removed, the biological productivity of the area is not enhanced as the area reverts to its previous status, supporting only those animals that adapt to invasive plants.

The applicant's proposals to restore the wetland and to remove pampas grass would be would mitigate the shading and disturbance caused by the projects. However, restoration efforts have failed when invasives have taken over. Such plants are troublesome and expensive to remove from restored areas. Without additional measures to assure viable restoration, the applicant's efforts could be wasted. These methods include:

1) the use of an identified seed source from the Ballona wetland area, if possible,
2) a detailed methodology for site preparation
3) much longer term maintenance and monitoring and replanting if necessary,
4) the removal of all pampas grass and other non-native invasive plants from the site.

Because Caltrans has suggested the use of a low bridge instead of a conduit, to get the ramps across the wetlands in question, the Commission must examine whether it could approve an alternative that would shade the area, but that would not require fill. The bottom of the channel would then not be altered, and would support animals that did not require sunlight. The channels however, would not support plants as they presently do because of the absence of sunlight. The channels proposed to be filled are about ten wide. The amount of area subject to profound shade must be assumed to be the same as the area subject to fill and a small area adjacent to the road would also be subject to intermittent shade.

This shading then would result in a serious impact to the biological productivity of the wetland because one crucial element of the wetland food chain is algae, which require sunlight for photosynthesis. The wetlands on the site are currently dominated by cattails, which are similarly sensitive to shading. The loss of a tenth of an acre 4,300 sq. ft. of sunlit surface will have an impact. The change to a low bridge is not significantly different to the alternative originally proposed, in terms of wetland functioning, and would have impacts on the productivity of the wetland.

Caltrans indicates the replacement of the impacted wetlands, as already proposed would mitigate the impacts of shading and temporary impacts, and could replace the lost productivity. The replacement of non-native plants with native riparian and CSS plants would similarly increase the productivity of the area by supporting terrestrial, but wetland dependent species of animals. However, the early restoration efforts that the Commission approved, most notably A-266-77 (along Ballona Lagoon) and another project along the Grand Canal Venice (5-82-479) did not successfully restore native plants because native plants were quickly displaced by invasive species such as ice plant and myoporum. These projects were later redone with public grants. Ice plant, myoporum and pampas grass are all found on this site in the costal zone and nearby. Restoration programs that followed staged programs, removed invasives and replaced them with plants that supported native animals have succeeded. Therefore the Commission, in Condition 1, is imposing a sequence consistent with that followed by more successful restoration projects such as Ocean Trails A-5-RPV-93-005.

The Commission finds that construction of a bridge a few inches above the wetland will impact the area's productivity, but that the impact can be mitigated. The project as now proposed is consistent with section 30233. However, to avoid impacts on the productivity of the wetland, and to assure consistency with section 30231 and 30240, which as described elsewhere requires the productivity of the habitat to be protected, the commission has required the applicant to carry out its proposed restoration and to remove invasive plants. Due to the uneven success experienced by restoration projects, the commission has required that the applicant carry out its project in a manner and in a sequence to assure that the project will be compatible with nearby habitat areas and will in fact enhance the productivity of the restored areas. As conditioned, with these methods and requirements, the Commission finds that the project will maintain the biological productivity of the environmentally sensitive area. Therefore the project is consistent with Section 30231 and 30240 of the Coastal Act.

D. WATER QUALITY MARINE RESOURCES

Section 30230 requires the protection of marine resources.

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.

Roads are major sources of pollutants that flow into water bodies. The new section of road proposed in the proposed project will drain to Ballona Creek, Ballona Wetlands and ultimately to Marina del Rey. In order to protect water bodies and water quality, from polluted run-off, the applicant proposes to use fossil filters in all of its project drains. Caltrans encourages trash removal programs and plans to design the freeway to reduce the discharge of polluted water. Caltrans indicates that it opposes use of filtration on highways because such filters can result in ponding on the road surface, presenting a hazard to motorists.

The Caltrans program for Best Management Practices on freeways 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

For this project, the following BMPs will be used:

- On the Connector ramps we are using dikes to intercept runoff from the paved surfaces.
- Drainage swales will be placed at the bottom of the fill slopes for the Connector ramps to collect the flows from the side slopes.
- Flared end culvert sections and rock slope protection are used to prevent scour and minimize erosion at the outlet locations.
- The created wetlands is also considered a BMP as the runoff from the roadway will be filtered through the system, and come out cleaner than it went in.

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.

The project drains into Area C Playa Vista, and from this area, via culverts, into Area A and into the Marina del Rey, an impaired water body. The RWQCB is investigating measures to improve the water quality of the Marina del Rey. Important bird, invertebrate and fish species live in the area and feed in these waters, and the area has high human recreational use. Therefore it is appropriate to employ as many measures as feasible to ensure that the water discharged from this project is improved in quality from its present

condition or at is least no worse, after the increased automobile traffic that will be attracted by the bridge. The Commission has required in its conditions measures to improve the quality of water discharged into the habitat. The Commission finds that it is possible to improve the quality of water discharged from the project by requiring 1) measures during construction to reduce runoff and siltation, and 2) on site filtration area in the median strip to filter road runoff before in enters the wetlands on the site, 3) requiring these measures to be effective in an 85th percentile storm. As conditioned the projects is consistent with Coastal Act Sections 30230 and 30231 in terms of its potential impacts on water quality.

E. PUBLIC SHORELINE ACCESS AND RECREATION

Section 30210 requires that maximum access to the coast be provided. Section 30223 requires the reservation of upland that are necessary to support coastal recreation. The project will allow increased speed and volume on an east-west traffic route that can deliver inner city and East County beach goers to the Venice and Playa del Rey beaches and to Marina del Rey. Although the project is designed to reduce commercial and commuter traffic loads on Lincoln Boulevard and on east-west routes during peak commuter hours, it can and will serve to improve vehicular access to the coast on weekends as well.

There is a bicycle lane in the median strip of Culver Boulevard east of the Coastal Zone boundary. The bicycle and jogging path extends from a park at Overland Avenue to the Culver City/Los Angeles boundary and from there to a point where a self-storage unit occupies the median strip, about two blocks east of Route 90. Project engineers state that the distance between the bridge supports is wide enough to accommodate additional traffic lanes and a bicycle lane on Culver Boulevard. The additional lanes, including the bicycle lane, would be located along Culver Boulevard and travel under the bridge. As proposed, the project is consistent with the development of additional recreational facilities, will improve and enhance public access to the coast and is consistent with Sections 30210 and 30223 of the Coastal Act.

F. DEVELOPMENT

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

Section 30250.

(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services

and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels.

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 nonautomobile 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 projects with relatively high levels of density 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, Culver Boulevard and the Marina Freeway. (Most notably the Commission found no substantial issue on 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 LUPs 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 in LUPs 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 2,700 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 elsewhere, 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. (Exhibits 25-27.) The plan approvals were granted before the courts issued the Bolsa Chica decision.

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 transitway. The City has also required jitneys within Playa Vista. However, the transportation improvements that the Commission has actually reviewed to date concentrate on road widening and on traffic management methods to increase vehicular speeds. Transit under consideration by the Department of Beaches and Harbors for the Marina del Rey 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 though the wetlands and then south through the South Bay.[6] There is no analysis of methods of using this older right-of-way for a dedicated transitway or other alternative transportation.

While the project itself is the road, not the development requiring the road, the Commission notes that approval of this project may commit the area to automobile transportation. There is some evidence that wider and faster roads attract cars by improving the convenience of the automobile. Approval of this project may commit the area to automobile-based transportation by foreclosing consideration of alternatives that are required in Section 30252 of the Coastal Act.

G. CERTIFIED LAND USE PLANS.

This bridge is one of the road-widening projects incorporated into the certified Land Use Plan for Playa Vista, even though it is technically outside of the study area. In 1984 the Commission approved the Marina del Rey Ballona LUP. This bridge is adopted as part of the Circulation Element of the plan, even though Los Angeles County prepared the LUP and the roadway is owned by Caltrans and located in the City of Los Angeles (Exhibit 27.) Again in 1987, the Commission approved parallel LUPs for the Marina del Rey and, in the City of Los Angeles, the Playa Vista LUP that showed the identical transportation system measures, including the present project.

As noted above, the Marina del Rey and Playa Vista LUP's, certified by the Commission in 1987, encourage the reservation of transit corridors and the adoption of shuttle programs. However, they rely on development caps and widened roadways to provide the transportation capacity necessary for the anticipated high-density development. All

[6] The South Bay comprises the Cities El Segundo, Manhattan Beach, Hermosa Beach and Redondo Beach and cities directly inland of them such as Lynwood and Lomita. They are directly inland of a bay extending from Ballona Creek to the Palos Verdes Peninsula.

include high levels of density and multiple traffic impacts and provides for widened roadways. The plans provide for the extension of Admiralty Way to Culver Boulevard, widening Lincoln Boulevard to eight lanes, widening Culver and Jefferson Boulevards, widening other roads, and extending the Marina Freeway. The certified Playa Vista Land Use Plan shows Culver Boulevard as an alternative transportation corridor, and includes policies that provide for widening Culver Boulevard and extending the Marina Freeway. With respect to this project, Policy 4.18 of the Playa Vista LUP states:

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

Although these permit and LUP approvals seemed to assume that roadways to accommodate the development would be approved, until the local coastal program is fully certified, the standard of review for the roadways themselves is Chapter 3 of the Coastal Act. The Commission, faced with more detailed information about the impacts of the development conceptually approved in the Land Use Plans, is able to reexamine the effects of the development. A Land Use Plan is not binding on the Commission and any development listed in an LUP is subject to review based on the Coastal Act. The Commission has also noted that the standard of review for any amendments to the land use plans would be the policies of Chapter 3. Therefore, in the absence of a fully certified LCP, the Commission's earlier decisions that the "area" could accommodate high-density development does not commit the Commission to approving development that would not otherwise be approvable consistent with the policies of Chapter 3.

H. VISUAL IMPACTS.

Section 30251 requires that development be sited and designed to minimize visual impacts.

> **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.

The Controller of the State of California, as the custodian the land adjacent to this road, Playa Vista Area C, which is held in trust for the State of California, has clearly stated her intent to transfer the land to the Department of Parks and Recreating development as a park. The area is not now a public park and will not be one until the Legislature acts to

designate the land as a park. Nevertheless, in considering the design of public structures adjacent to the land, the Commission must consider the compatibility of the proposed development with a prospective public park and with public use of the area. In this instance, compatibility includes the impacts on views to and from the bridge and the compatibility of the bridge and its design with future recreational facilities.

The bridge will be elevated roughly 30 feet above roadway level. This will provide a view of Area C, but also will be visible from Area C. The bridge will be a standard concrete bridge. Caltrans plans three-foot high tapered concrete solid rails (type 736) that provide no views through the rails. There will be no view of either the development proposed on Area C or of the possible urban park from the bridge from compact cars, although the drivers and passengers in SUVs and other taller vehicles will be able to see over the rails. The bridge will have concrete pilings, which will be enlarged with tapered supports at the head of the columns. The bridge will be relatively low and unobtrusive and will not be visually obtrusive from either public or private areas. If the rails provided views of the area, the bridge would also be more interesting visually.

The bridge has no significant impacts on public views. It is adjacent to structures that range from 20 to 40 feet in height. It is low enough to be subordinate to its setting. The project is consistent with the view protection policies 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 did not identify significant soil gas accumulations north of Ballona Creek. The present bridge and ramp work that is within the jurisdiction of the Commission is about half a mile north of the part of the Playa Vista project that has been shown to have high concentrations of soil gas. Caltrans

sought an opinion from Gustavo Ortega, a Caltrans staff geologist, concerning the possible hazard of soil gas to this 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. The applicant's geologists have taken these conditions into account and designed to accommodate these potential hazards. The project is not located in an area subject to other hazards, such as landslides or flooding. As such, the project is consistent with Section 30253 of the Coastal Act.

J. ARCHAEOLOGICAL HISTORICAL AND PALEONTOLOGICAL DEPOSITS

The part of this project outside the Coastal Zone is within an area that is described in some confidential documents as encompassing LAN 54, a registered archaeological site. Caltrans asserts that its staff has evaluated the site for archaeological deposits. An adjoining property owner is required to recover the part of the site that is located on its property. Caltrans has not provided any evaluation to the Commission or any statement from the State Historic Preservation Officer as to the absence of a site where the bridge and ramps are planned. Section 30244 of the Coastal Act requires:

> **Section 30244**
>
> Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

Caltrans has not provided evidence that the State Historic Preservation Officer has evaluated this site or that it is confirmed that the site lies outside any known archaeological sites and would not impact such sites. Caltrans has not demonstrated that this project is consistent with Section 30244 of the Coastal Act. Only as conditioned to (1) evaluate the project in light of current confidential reports, and (20 obtain concurrence of the state historic preservation officer (SHPO) with such evaluation can the Commission find this development consistent with section 30244 of the coastal act. Pursuant to these requirements, the Commission is requiring re a second review of the site in light of newly assembled information, and that a qualified archaeological monitor be on site during grading of those portions of the project that are located within the coastal zone. As conditioned the proposed project is consistent with section 30244 of the coastal act.

K. 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, there is damage proposed (wetland fill) and (1) the mitigation is not adequate to substantially lessen the significant adverse effects of the fill, or to enhance the productivity of the wetland, in conformity with the Coastal Act; (2) the damage is not justified under the strict standards of Chapter 3. However, the applicant has shown that there is one feasible alternative and one alternative that might be feasible that would avoid the wetland fill or otherwise avoid the adverse impacts of the project. In sum, there is evidence that there are other feasible alternatives or mitigation measures available that will lessen any significant adverse impact the activity would have on the environment. Therefore the applicant is conditioned to carry out one of these alternatives along with mitigation measures that might mitigate the foreseeable impacts of the development as modified by this action. Therefore, the Commission finds that the proposed project is consistent with CEQA and the policies of the Coastal Act and the project may be approved as conditioned.

L. UNPERMITTED DEVELOPMENT

I. Unpermitted Development

Development has occurred on site without benefit of the required coastal development permit, including demolition of leased operations, which included the recreational vehicle storage facility, portions of the pottery store and other facilities located within the coastal zone. Consequently, the work that was undertaken constitutes development that requires a coastal development permit.

Consideration of the permit application by the Commission has been based solely on the consistency of the proposed development with the policies Coastal Act. Approval of this permit does not constitute a waiver of any legal action with regard to the alleged unpermitted development, nor does it constitute admission as to the legality of any development undertaken on the subject site without a coastal development permit.

APPENDIX A
SUBSTANTIVE FILE DOCUMENTS:

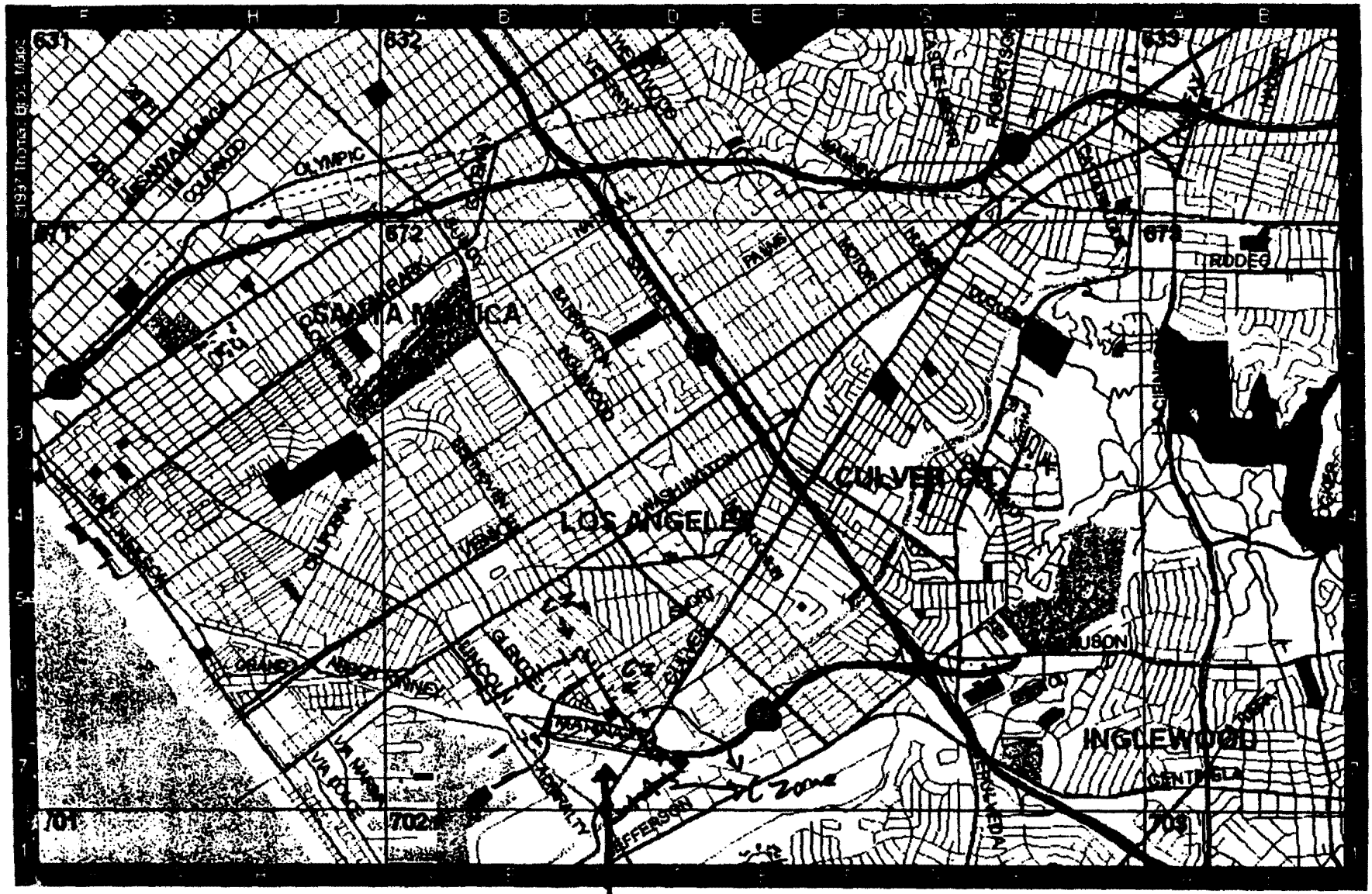
1. Environmental Impact Report, First Phase Project for Playa Vista, EIR No. 90-0200-SUB(c)(CUZ)(CUB) State Clearinghouse No. 90010510; Appendix D Mitigation and Monitoring Program; Mitigation Measures Tracts 49104 and 52092.
2. Haripal S. Vir, Senior Transportation Engineer, Department of Transportation, City of Los Angeles, Memorandum to Merryl Edelstein, Senior Planner "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), September 16, 1992
3. Haripal S. Vir, Senior Transportation Engineer, Department of Transportation, City of Los Angeles, Memorandum to Merryl Edelstein, Senior Planner "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)," revised May 24, 1993.
4. City of Los Angeles Mitigation Monitoring and Reporting Program Exhibit "C "As Amended To Include Condition of Approval No. 96 as Required by Condition of Approval NO. 12 of Vesting Tentative Tract no. 49104 (Exhibit "B") and Condition of Approval No.'s 141, 141, 144, 145, 150, and 151 as Required by the Modification to VTTM 49104 Approved by the City Council on December 8, 1995 Exhibit "A".
5. City of Los Angeles, City Council, Action: Appeals against the Planning Commission's Approval of Tentative Tract 52092 and Modification of Tract 49104 for Property near Centinela Avenue and Jefferson Boulevard in the Playa Vista Area, December 8, 1995.
6. 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.
7. Los Angeles County, Marina del Rey/Ballona LUP, Certified 1984.
8. Los Angeles County, Marina del Rey LUP, Certified 1987.
9. City of Los Angeles, Playa Vista LUP, Certified1987.
10. Bolsa Chica Land Trust v. Superior Ct. (1999) 71 Cal. App. 4th 493.
11. Psomas Associates, State Route 90/Cullver Flyover: Jurisdictional Wetlands, Streambeds and Waters of the United States, December 1995.
12. AGRA Earth and Environmental Inc., "Final Geotechnical Design Report, Route 90 Extension From 0.38 Km East Centinela Ave To 0.23 Km East of Mindanao Way, Los Angeles California EA 1693U1, 07-LA-KP 1.2/1.9, June 30, 2000."
13. Caltrans: Alternatives analysis (1) and (2) regarding the Route 90 bridge.
14. 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.

15. 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.
16. 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 5-00-139, 5-91-463, 5-98-164, A-5-PDR 99-130/5-99-151; 6-97-161, A-5-PLV-01-281/5-01-223;A-5-PV-00-417/5-01-382; 5-98-164; 5-98-164A, A-266-77, A-5-RPV-93-005; 5-82-479.
17. City of Los Angeles Bureau of Engineering Staff Report, No. 95-03 –August 2, 1995
18. LADOT Inter-departmental correspondence --Amendment of Initial Traffic Assessment and Mitigation Letter dated September 16, 1992 --Revised May 24, 1993.
19. 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
20. 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."]
21. 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 Hoye dated 27 November, 2000 and signed by A. J. Skidmore and M. Zych (RG).
22. Mark Johnsson, Senior Geologist, California Coastal Commission, Memorandum: "Culver Boulevard Widening Project and Potential Soil Methane Hazards"
23. 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."
24. City of Los Angeles Department of Building and Safety, Memorandum of General distribution, #92, Methane Potential Hazard Zones, March 19, 1991.
25. 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
26. California Department of Fish and Game, Memorandum: Extent of Wetlands in Playa Vista, December 1991."
27. California Coastal Commission, Memorandum: "Volume II Preliminary Working draft EIS/EIR Existing Conditions –Playa Vista March 5, 1998"
28. City of Los Angeles General Plan Palms, Mar Vista Del Rey District Plan, –Playa Vista Area C Specific Plan;
29. City of Los Angeles City Council: Conditions of Approval, Vesting Tentative Tract Map 49104 (As Revised December 8, 1995)

30. City of Los Angeles City Council: Conditions of Approval, Vesting Tentative Tract Map 52092 (December 8, 1995)
31. City of Los Angeles Tentative Tract Number 44668, Map and conditions of approval, May 4, 1987.

H:\playa vista\caltransroad\5-01-432.culver3.caltrans.doc

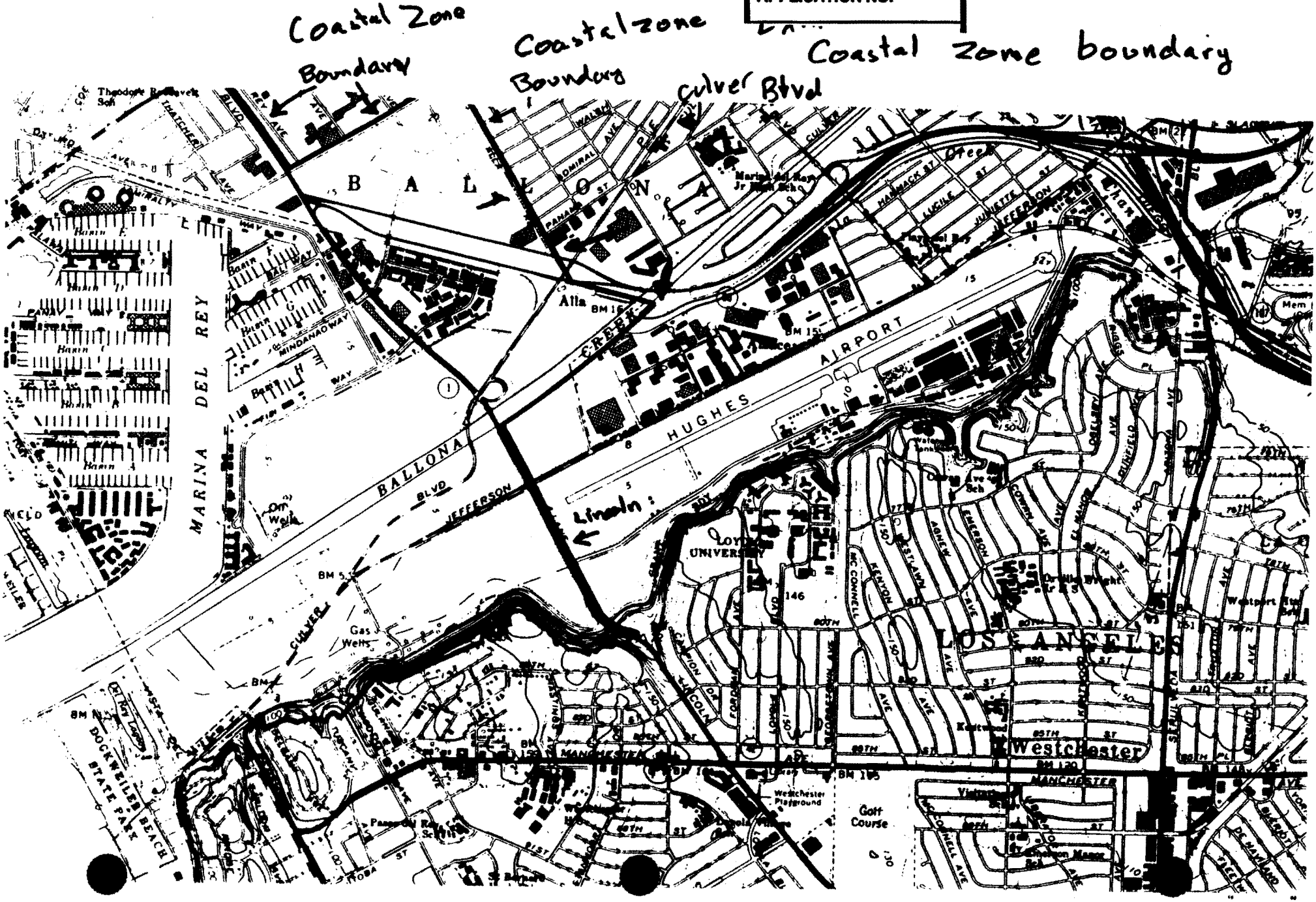
EXHIBIT NO. 1
APPLICATION NO. 5-11-132
Site



5-01-432

EXHIBIT NO. 2
APPLICATION NO.

Caltrans Culver Bridg.



5-01-432 Exhibit 3 scope of project

INDEX OF SHEETS

STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

Metric

PROJECT PLANS FOR CONSTRUCTION ON
STATE HIGHWAY
IN LOS ANGELES COUNTY
IN LOS ANGELES
FROM 0.4 km EAST OF CENTINELA AVENUE
UNDERCROSSING TO 0.3 km EAST OF MINDANAO WAY

To be supplemented by Standard Plans dated July, 1999

DIST	COUNTY	ROUTE	KILOMETER POST TOTAL PROJECT	SHEET NO.	TOTAL SHEETS
07	LA	90	1.9/R2.9		

LOCATION MAP

BEGIN CONSTRUCTION
STA 72+70.695 KP R2.9
PM R1.8

END CONSTRUCTION
STA 88+80 KP 1.8
PM 1.2

Limit of Work
Culver Blvd
Sta 22+10

Limit of Work
Mindanao Way
Sta 29+60

End of Work
Sta 20+30

Limit of Work
Culver Blvd
Sta 23+52

Limit of Work
Mindanao Way
Sta 31+60

Begin Work
Sta 66+40

ENVIRONMENTALLY SENSITIVE AREA

CULVER CITY

LOS ANGELES

ROUTE 90

ROUTE 187

ROUTE 1

ROUTE 405

BALLONA CREEK BR
BR NO 53-2315

CULVER BLVD UC
BR NO 53-2306

CENTINELA AVE OC
BR NO 53-2314

NO SCALE

Depiction coastal zone boundary

The Contractor shall possess the Class for classes) of license as specified in the "Notice to Contractors".

CITY OF LOS ANGELES

MOFFATT & NICHOL ENGINEERS
695 NORTH VINEYARD AVENUE, SUITE
ONTARIO, CALIFORNIA 91764

Contract No. 07-169

MICHAEL A. KRAMAN
FERADE S. NESFIN
C39775

Approved as to impact on State facilities and conformance with applicable State standards and practices and that technical oversight was performed as described in the California Department of Transportation, A & E Consultant Services Manual

DEPARTMENT OF TRANSPORTATION
DIVISION OF ENVIRONMENTAL PLANNING
120 SOUTH SPRING STREET
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0703
FAX (213) 897-0685

Flex your power!
Be energy efficient!

January 15, 2002

Ms. Pam Emerson
California Coastal Commission
South Coast District
200 Oceangate, 10th Floor
Long Beach, CA 90802-4325

Dear Ms. Emerson

This letter is in response to your final question about the LA-90 project (Coastal Development Permit Application 5-01-432).

At this point, it appears that the Bridge Alternative is the California Department of Transportation preferred alternative. However, the East Alternative still has some beneficial aspects.

Thank you again for your very prompt and competent assistance.

Your assistance in bringing this project before the Coastal Commission in February 2002 is greatly appreciated. If you have any questions or require additional information, please contact Stephanie Reeder, District 7 Coastal Commission Liaison, at (213) 897-5446.

Sincerely,

Ron Kosinski

RON KOSINSKI
Deputy District Director, Division of Environmental Planning

RK / SR

EXHIBIT NO. 4
APPLICATION NO. 5-01-432
Revised
Project Description

Exhibit 5
p1

EXHIBIT NO. 5
APPLICATION NO.
5-01-432

RECEIVED
FEB - 2 2001
CALIFORNIA
COASTAL COMMISSION

LOT COVERAGE TABLES

TOTAL LOT AREA (within Property Lines and Coastal Zone Limits of Project) = **38.52 acres = 156000 m2**

EXISTING AREAS BEFORE ROUTE 90 CONSTRUCTION

LOT COVERAGE	AREA acres
Existing Building/Structure	
Athletic Club	0.32
Pottery Location	0.07
Self Storage Facility	0.02
Nursery Lot	0.06
Existing Paved Area	
Parking Lot	
Athletic Club	0.57
Pottery Location	0.21
Self Storage Facility	5.09
Nursery	0.21
Route 90 Off- and On-Ramps	2.24
Streets	
Culver Blvd	0.86
Mindanao Way	1.44
Eastbound Frontage Rd	2.51
Westbound Frontage Rd	3.00
Existing Landscaped Area	
Athletic Club	1.72
Nursery	1.37
Existing Unimproved Area	18.83
Total =	38.52

Exhibit 5
p 2

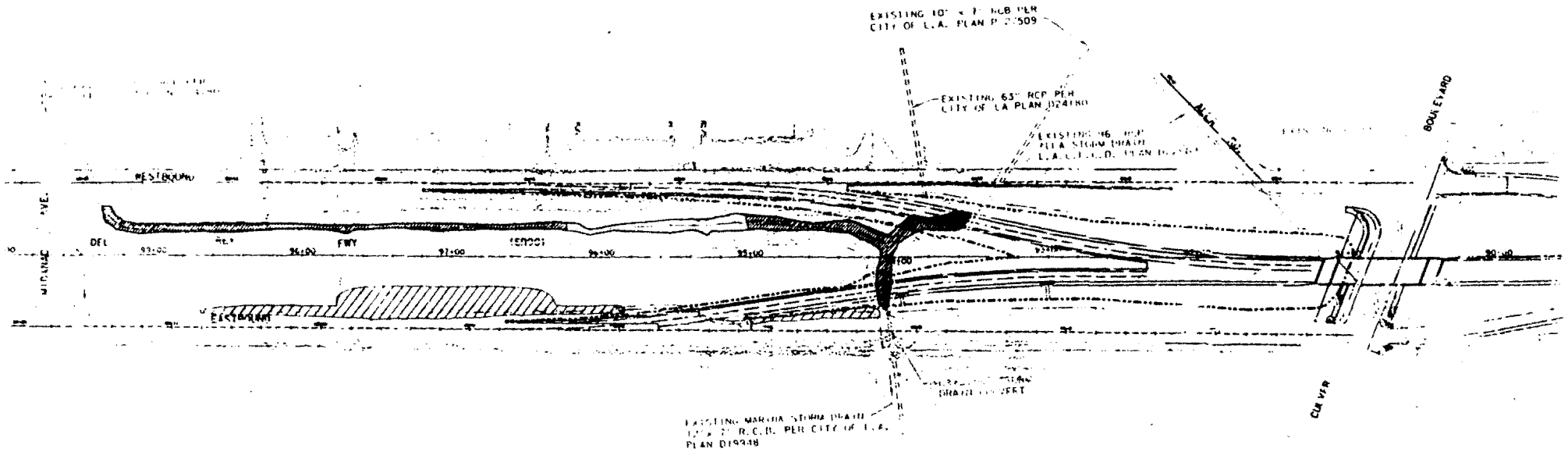
EXHIBIT NO. 5
APPLICATION NO.
5-01-432

LOT COVERAGE

TOTAL LOT AREA (within Property Lines and Coastal Zone Limits of Project) = **38.52 acres = 156000 m2**

EXISTING AND NEW PROPOSED AREAS AFTER ROUTE 90 CONSTRUCTION

LOT COVERAGE	AREA acres
Existing Building/Structure	
Nursery	0.06
Existing Paved Area	
Parking Lot	
Nursery	0.21
Streets (Culver Blvd, Mindanao Way, Frontage Roads)	6.71
Existing Landscaped Area	
Nursery	1.37
Existing Unimproved Area	14.56
New Proposed Building/Structure	
Culver Blvd Undercrossing	0.67
New Proposed Paved Area	
Route 90; On- and Off-Ramps	6.13
Streets	
Culver Blvd Widening	0.85
Mindanao Way Widening	0.19
New Proposed Landscaped Area	
Mitigation Area (Includes additional 0.3 acres)	0.89
Embankment Side Slope Areas (Erosion Control only)	3.68
New Proposed Unimproved Area	
Areas of Existing Parking Lot Pavement Removal + Landscape Removal + Structure Removal that are not within the new proposed pavement and grading limits.	3.20
Total	38.52



LEGEND

EXIST. STORM DRAIN
EXIST. CATCH BASIN
PROPOSED STORM DRAIN
PROPOSED CATCH BASIN
PROPOSED GRADED SLOPE
EXISTING ROW LINE
HIGH POINT
SURFACE DRAINAGE PATH
PROPOSED S.D. INLET STRUCTURE
CORPS JURISDICTIONAL WATERS OF U.S. & CDF&G JURISDICTIONAL WETLAND (0.99 acs)
CORPS JURISDICTIONAL WETLAND (0.78 acs)

CORPS JURISDICTIONAL WATERS OF U.S. & CDF&G JURISDICTIONAL WETLAND IMPACTED (0.17 acs)

MITIGATION WETLANDS (0.73 acs)

SCALE: 1:2500

Initial Design

5-01-432

Exhibit 6
Wetlands 01

MARINA FREEWAY (SR90)
WETLANDS EXHIBIT

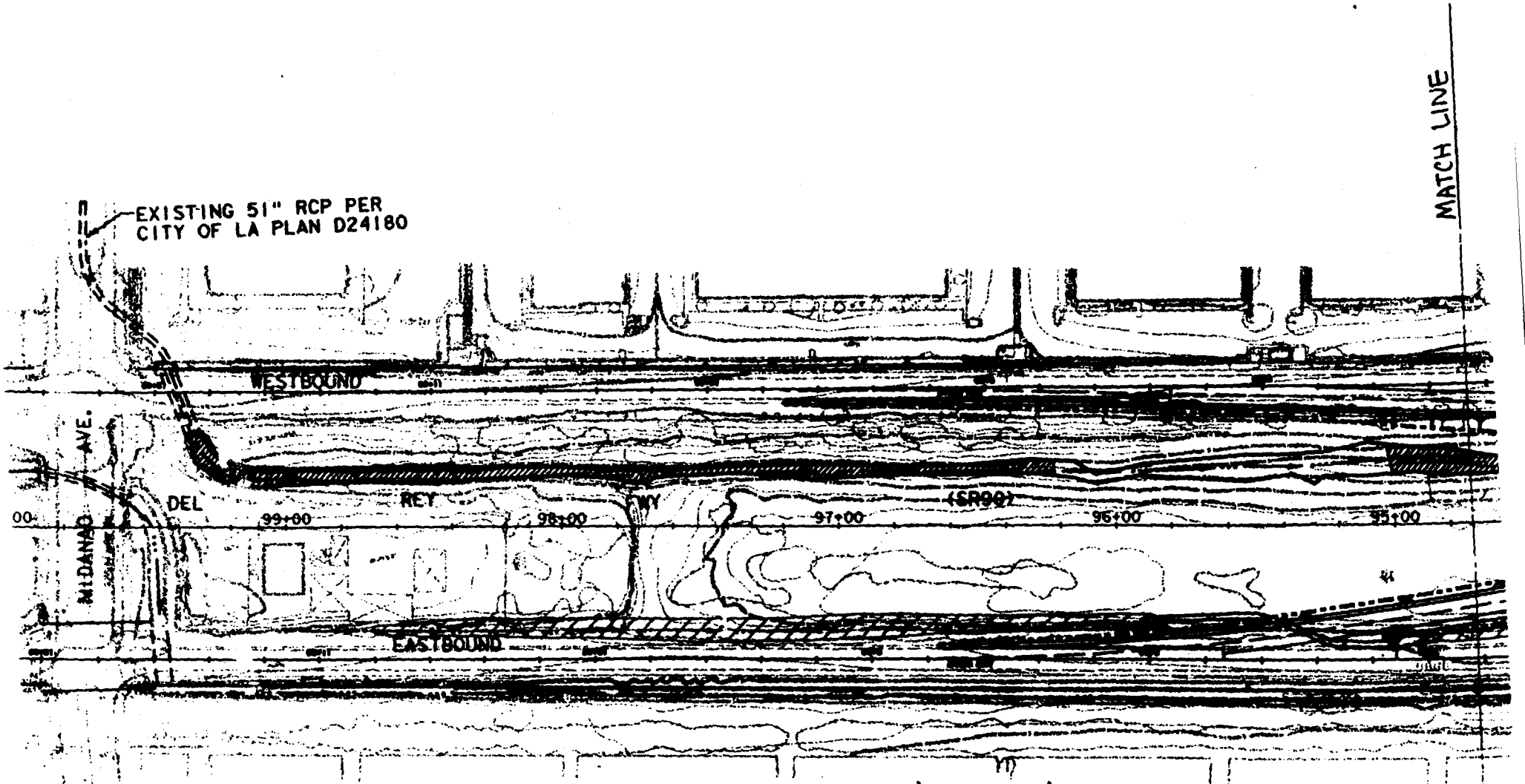


EXHIBIT NO. 7
APPLICATION NO.
5-01432
Wetlands enlarged

Exhibit 8 1
cal

EXISTING MARINA STOF
12'x 7' R.C.B. PER C
PLAN D19948

Match

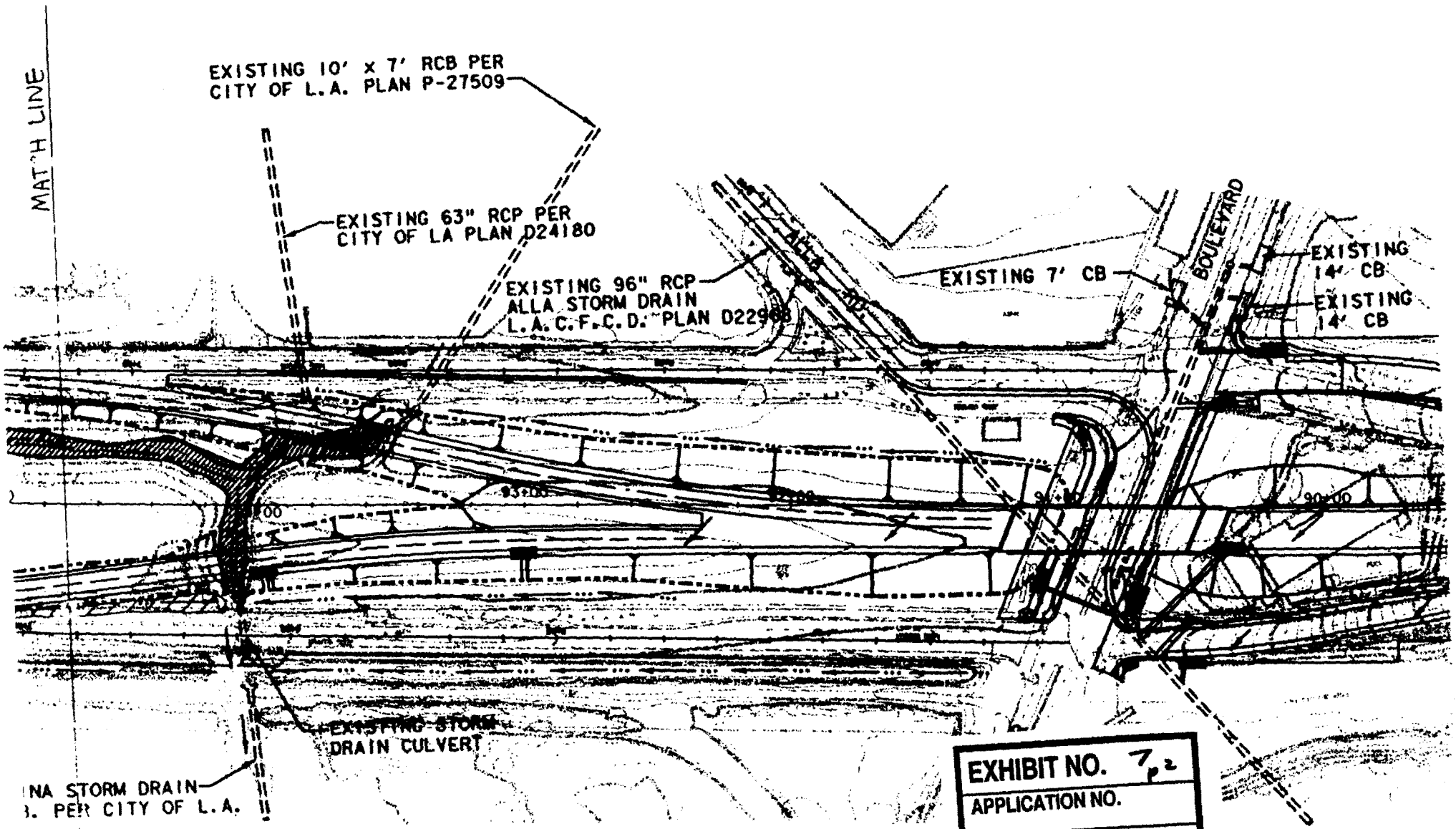


EXHIBIT NO. 7, p 2
APPLICATION NO.
5-01-432

Match.

Wetlands
enlarged 1:2

EXHIBIT NO. 7 p.3
APPLICATION NO.
5-01-432

LEGEND

EXISTING STORM DRAIN
EXISTING CATCH BASIN
PROPOSED STORM DRAIN
PROPOSED CATCH BASIN
PROPOSED GRADED SLOPE
EXISTING ROW LINE
HIGH POINT
SURFACE DRAINAGE PATH
PROPOSED S.D. INLET STRUCTURE
CORPS JURISDICTIONAL WATERS OF U.S. &
CDF&G JURISDICTIONAL WETLAND (0.99 acs)
CORPS JURISDICTIONAL WETLAND (0.78 acs)

H.P.

CORPS JURISDICTIONAL WATERS OF U.S. &
CDF&G JURISDICTIONAL WETLAND IMPACTED (0.17 acs)

MITIGATION WETLANDS (0.43 acs)

Wetland Key Exhibit 8 p3

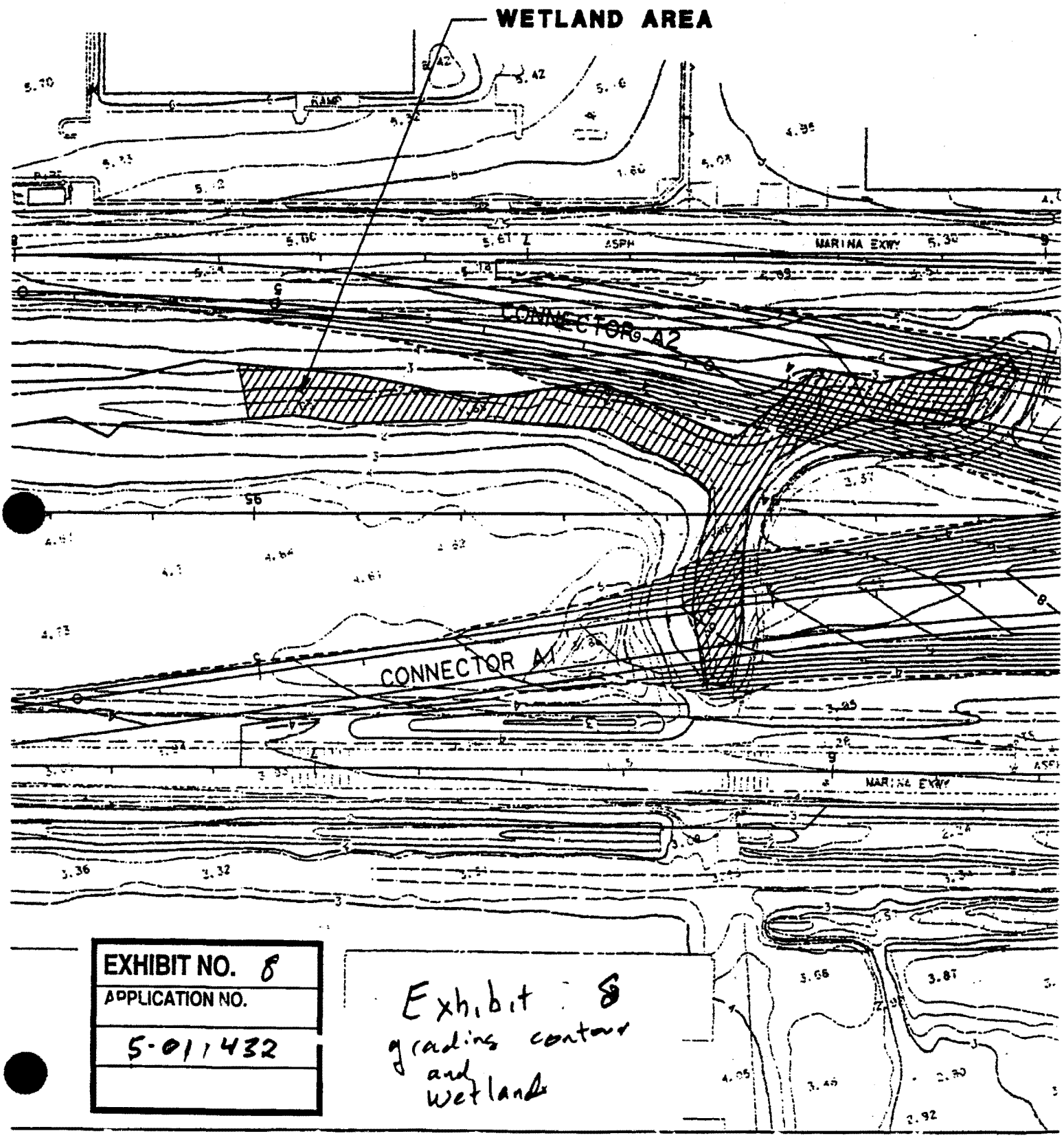


EXHIBIT NO. 8
APPLICATION NO.
5-01-432

Exhibit 8
grading contour
and
Wetland

07-LA-90 CENTINELA AVE TO MINDANAO WAY IMPROVEMENTS

CONNECTOR RAMPS - ALTERNATIVES ANALYSIS

Introduction

The purpose of this report is to provide an Alternative Analysis for the design of the Connector Ramps that will link the Route 90 freeway with the eastbound and westbound frontage roads. Aside from the currently proposed design, several alternatives were studied and are included, along with their pros and cons, in this report. One alternative moves the design west of the current proposed design towards Mindanao Way. A second alternative moves the alignment to the east of the current design. A third option was included for the current design to "bridge over the wetland" instead of filling the wetlands.

Of particular concern for each alternative are their respective impacts to the existing wetlands that are within the limits of the project. The existing wetland generally runs in a west-east alignment, which is parallel to the one-way eastbound and westbound frontage roads, and closest to the westbound frontage road on the north side. In addition, at about two-thirds of the distance from Mindanao Way towards Culver Boulevard, the wetland runs from one frontage road to the other in a perpendicular fashion. The current design primarily impacts this perpendicular section as the connector ramps split just prior too and then cross over the perpendicular section of the wetland while transitioning into their respective frontage roads. The quantity of fill into existing wetland areas and the resulting mitigation requirements were estimated.

Some information reviewed as a part of the alternative analysis study included the affects on project cost, duration of construction and the ability to meet safety design standards. Since the nature of the alignment configurations are similar and the tributary area remains the same for each alternative, the drainage and hydrologic characteristics are expected to be similar to that of the current proposed design.

West Alternative

One alternative that was considered involved merging the connector ramps from the bridge over Culver Boulevard to the existing one-way frontage roads further to the west (closer to Mindanao Way) of the current proposed design. In this case, the connector ramps do not split until after the perpendicular section of the wetland. See Figures W-1 to W-7. This design approach not only still impacts the perpendicular section, it also impacts the longitudinal portion of the wetland (parallel to the frontage road) from the connector merge into the westbound frontage road. As a result, this alternative would increase the wetland impacts, both permanent and temporary. The

5-01-432
Exhibit 9

p1

quantity of fill for this alternative covers an approximate are of 0.31 acres (compared to 0.17 acres for the current proposed design). This area of fill would permanently impact the wetlands. An additional temporary impact due to construction would be 0.30 acres (compared to 0.15 acres). At a 4:1 ratio, the required mitigation is estimated at 1.24 acres. Due the lengthening of the connectors in the easterly direction the project cost would increase from the current proposed design by roughly $500k. The construction duration would increase from approximately 10 to 12 months.

One advantage to moving the alternative west would be a reduction of standard design exceptions. This would provide a safer interchange configuration for the project. However, this would come at the expense of a higher construction cost and a significant increase in wetland impacts. In addition, this alternative was previously modified to the current proposed design to satisfy the visual and noise requirements set forth by the local residents.

East Alternative

A second alternative to the current design would involve merging the connector ramps with their respective frontage roads prior to the existing wetland to avoid any impact. The connector ramp split moves towards Culver Boulevard relative to the current proposed design. See Figures E-1 to E-5 for details. No filling of the wetlands would be required for this alternative. The project construction costs would reduce by approximately $500k due to the shorter length of the connector ramps. And the duration of construction in this area of the project would be expected to reduce by a few months as well. The biological impacts would be minimal, if any.

However, a significant concern with this alternative is an increase in both the quantity and scale of required design exceptions needed. This could create an unsafe driving environment since this is at the end of a freeway and vehicle speeds are expected to be excessive in this zone. Some significant exceptions may be required. This is primarily a result of the short distance from the Culver Undercrossing Bridge to the merge with the frontage roads and the amount of horizontal and vertical separation between the two fixed points. This creates substandard stopping sight distances, which reduces the reaction time a driver has to react to upcoming obstacles or unexpected road conditions. Another result is the tightness of the horizontal curvature of the connector to tie into the frontage road. Again, since the speeds at the end of the freeway are expected to be on the high side, the ability of the driver to handle the tight curve without leaving the roadway is hindered.

Bridge Over Wetland Alternative

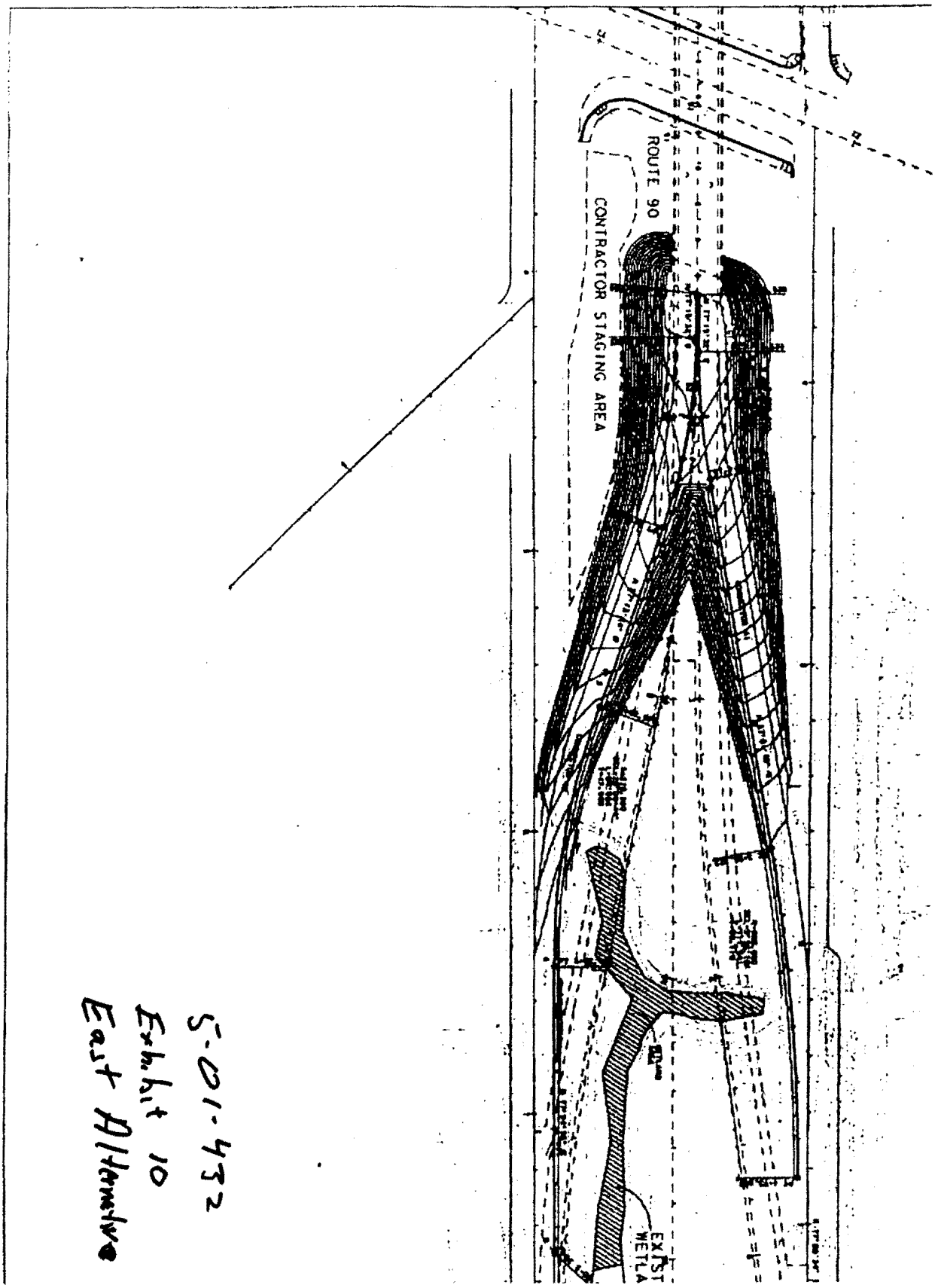
Another alternative maintains the current proposed design and includes placing a bridge over the existing wetland in place of filling in this area. See Figures B-1 to B-5

5-01-432
Exhibit 9
p2

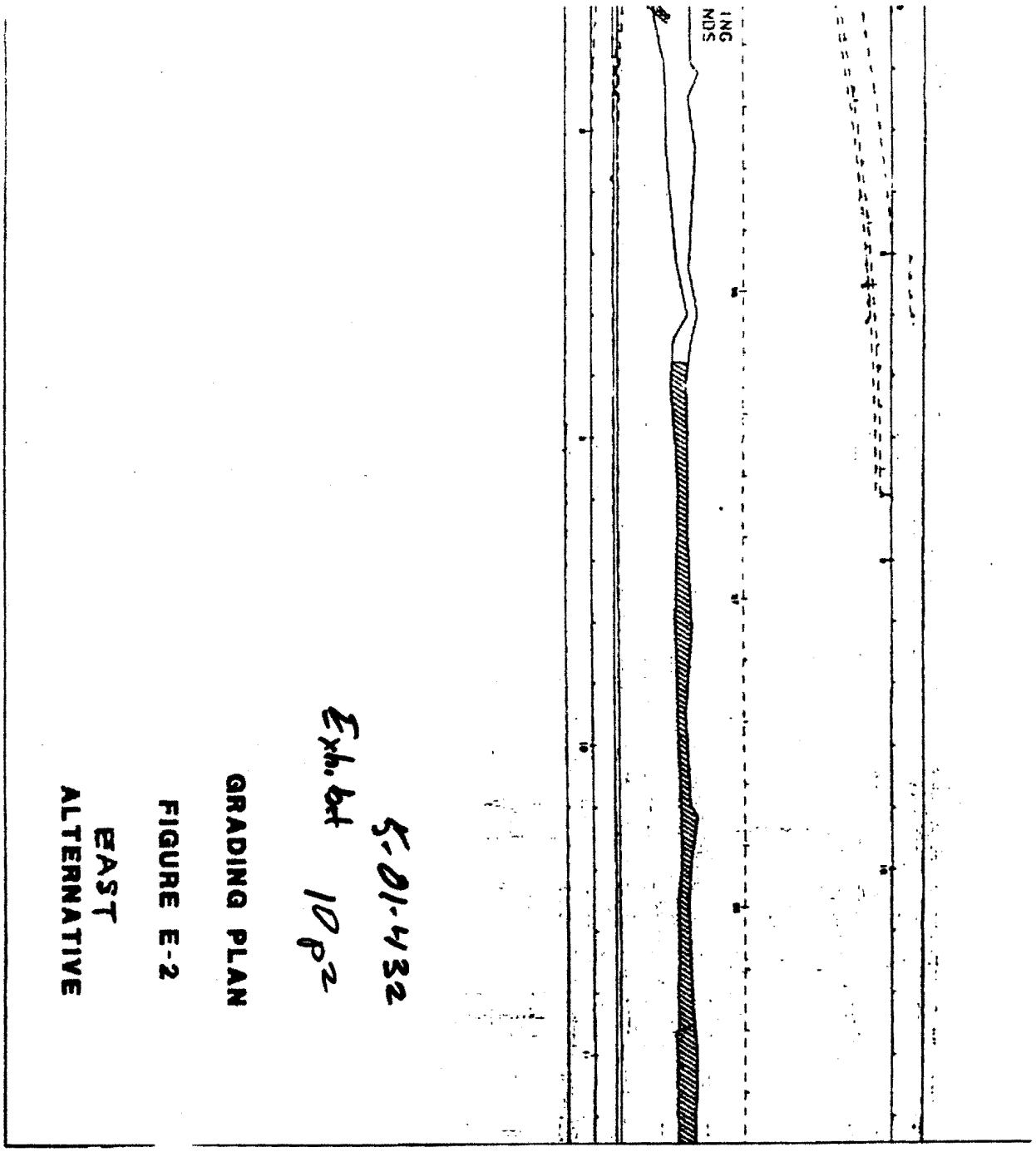
for details. Therefore, no filling of the wetlands would be necessary. Temporary impacts (~0.13 acres) would result from the area the equipment would need to place the footings and pilings to stabilize the bridges. The project construction costs, due to the construction of the bridges less the reduction of embankment, would be expected to increase by roughly $1 million relative to the current proposed design. The duration of construction would also increase by a couple of months to allow for proper settlement of the anticipated poor soil conditions in the vicinity of the footing supports.

Although no filling of the wetlands would be necessary, there would still be some permanent impacts. Since the bridge structures would be nearly an at grade structure, the wetland would be subject to the affects of shading. The close vertical proximity of the bridges to the ground will create indirect and permanent shading impacts to wetland areas and their plant community. The decrease in sunlight to a wetland area affects the plant composition and diversity. Wetland plants that are very dependent on sunlight (such as cattails) will not survive in shaded areas and will, therefore be replaced with species that are more shade tolerant (mugwort, annual grasses, and forbes). The biomass and diversity of the plant community would decrease and the plant structure would become simplified. It also decreases the temperature of the soil, impacting the type of vegetation that grows.

5-01-432
Exhibit 9
p3



5-01-432
Exhibit 10
East Alignment

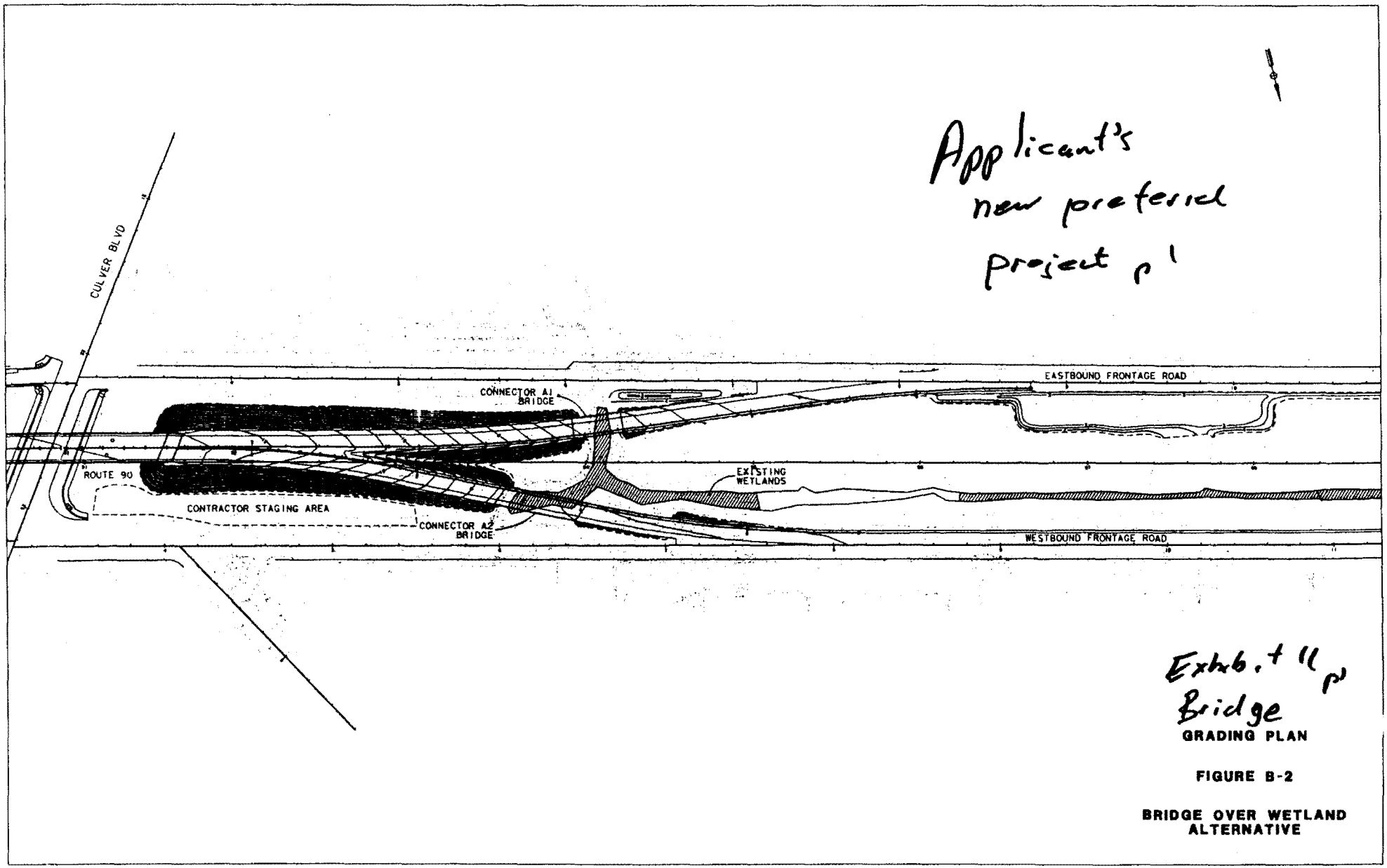


S-01-432
Exh. bat 10 p2

GRADING PLAN

FIGURE E-2

EAST
ALTERNATIVE



Applicant's new preferred project p 1

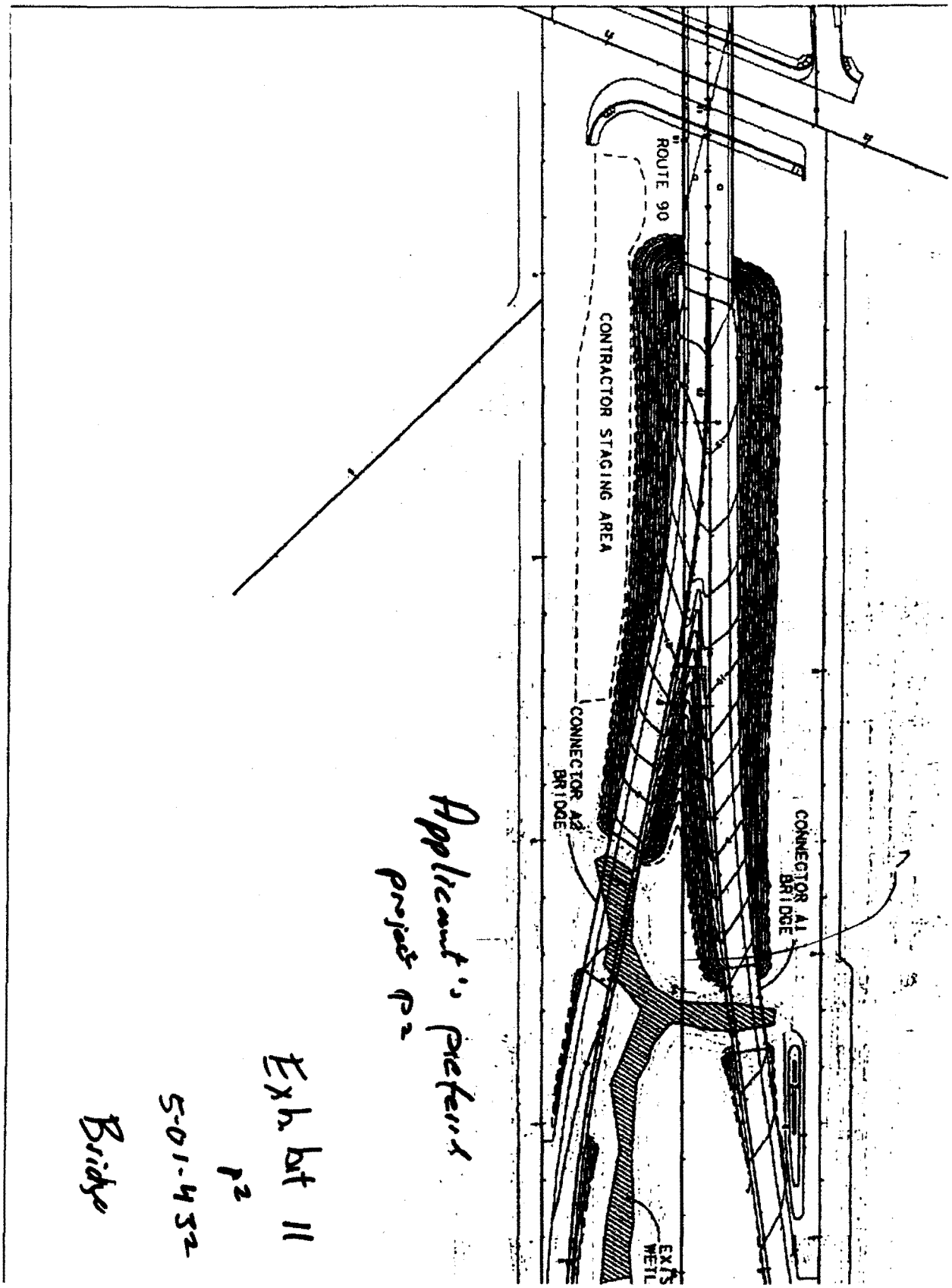
Exhib. t 11 p 1

Bridge

GRADING PLAN

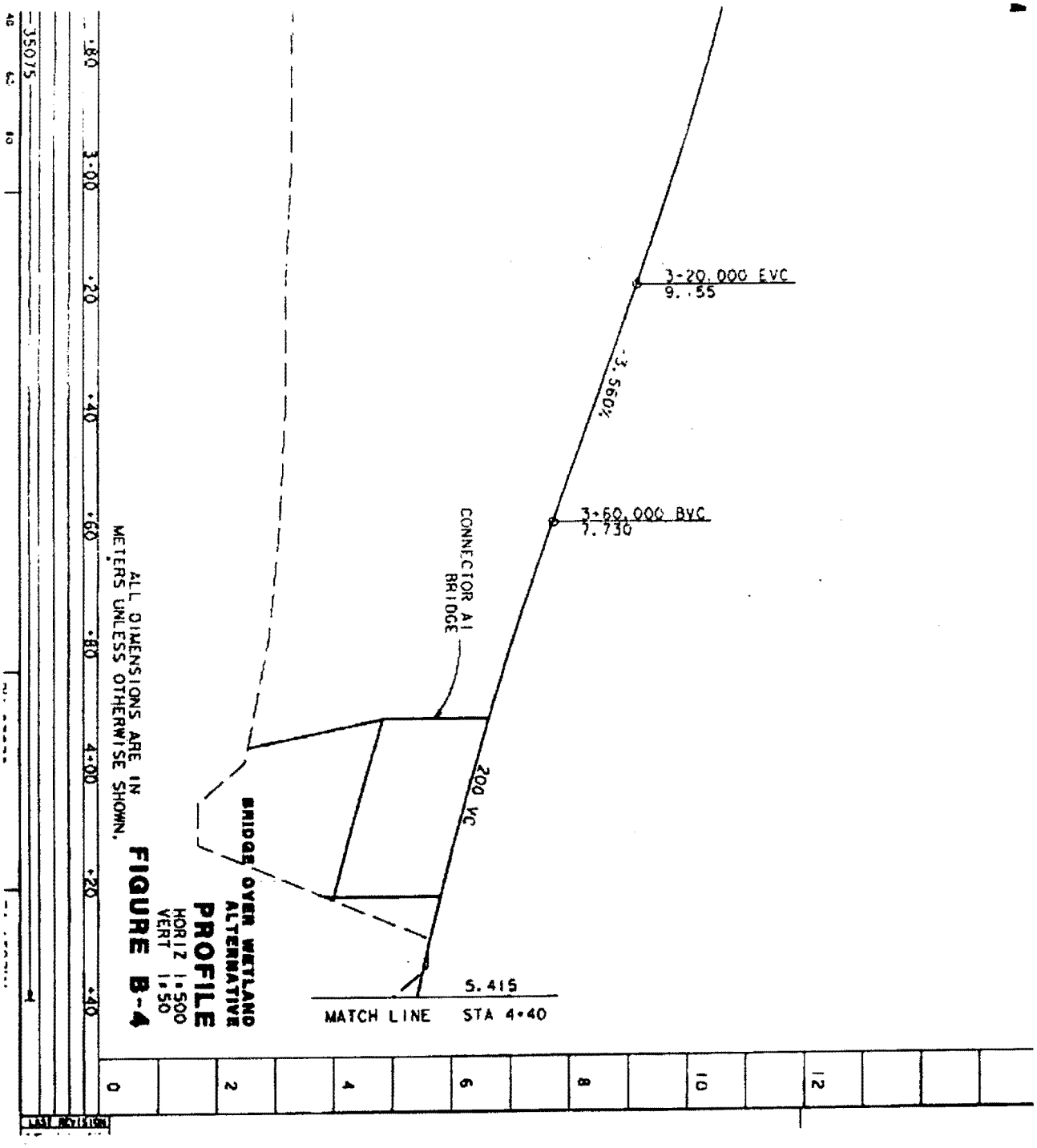
FIGURE B-2

BRIDGE OVER WETLAND ALTERNATIVE

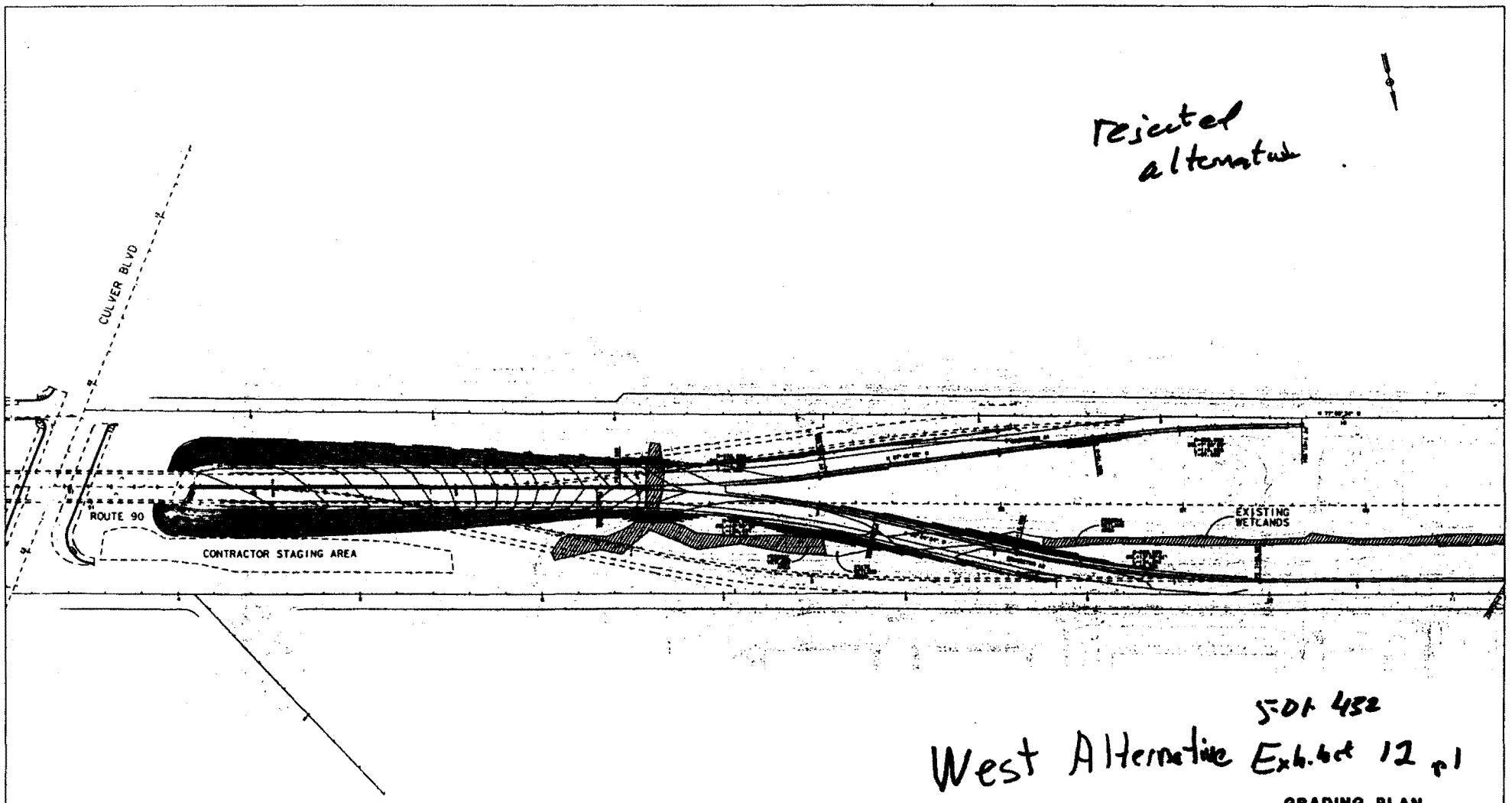


Applicant's Packet
Project #2

Exhibit 11
#2
5-01-432
Bridge



S-01-432
Exhibit 11
p3
Bridge



Rejected alternative.

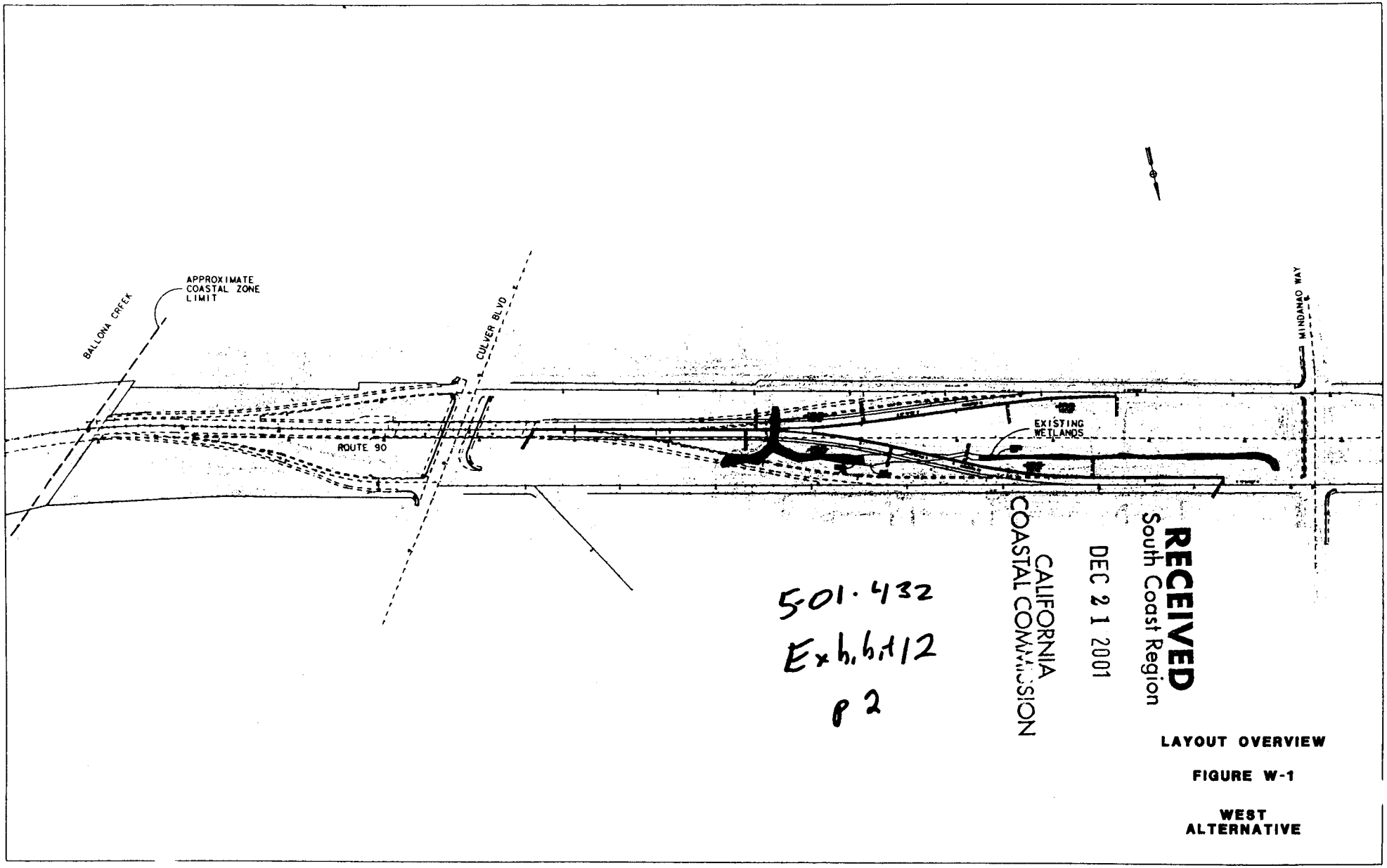
5:01 452

West Alternative Exhibit 12 p.1

GRADING PLAN

FIGURE W-2

WEST ALTERNATIVE



501-432
Exh. 6.1.12
p 2

LAYOUT OVERVIEW

FIGURE W-1

WEST ALTERNATIVE

Pam Beare
Habitat Conservation Planning, Region 5

EXHIBIT NO. 13
APPLICATION NO.
5-01-432
Fish & Game

Enclosure: SAA #5-265-00
CALIFORNIA DEPARTMENT OF FISH AND GAME
4949 Viewridge Avenue
San Diego, California 92123

Notification No.5-265-00
Page 1 of 4

AGREEMENT REGARDING PROPOSED STREAM OR LAKE ALTERATION

THIS AGREEMENT, entered into between the State of California, Department of Fish and Game, hereinafter called the Department, and Aziz Elattar of the California Department of Transportation, District 7, 120 South Spring Street, Los Angeles, CA 90012, hereinafter called the Operator, is as follows:

WHEREAS, pursuant to Section 1601 of California Fish and Game Code, the Operator, on the 8th day of November 2000, notified the Department that they intend to divert or obstruct the natural flow of, or change the bed, channel, or bank of, or use material from the streambed(s) of, the following water(s): that portion of an unnamed tributary to Ballona Creek located between the eastbound and westbound lanes of State Route 90 from Culver Blvd. to Midanao Ave., near the unincorporated community of Marina Del Rey, Los Angeles County, California, Section _ Township 2S Range 15W (Venice Quad.).

WHEREAS, the Department (represented by Pam Beare through a site visit on the 7th day of February, 2001) has determined that such operations may substantially adversely affect those existing fish and wildlife resources within unnamed tributary to Ballona Creek, specifically identified as follows: birds: great blue heron (*Butorides striatus*), barn swallow (*Hirundo rustica*), Allen's hummingbird (*Calypte anna*), American goldfinch (*Carduelis tristis*), northern mockingbird (*Mimus polyglottos*), and mourning dove (*Zenaida macroura*); riparian vegetation which provides habitat for those species: mulefat (*Baccharis salicifolia*), tall flatsedge (*Cyperus eragrostis*), cattail (*Typha* sp.), and all other aquatic and wildlife resources, including that riparian vegetation which provides habitat for such species in the area.

THEREFORE, the Department hereby proposes measures to protect fish and wildlife resources during the Operator's work. The Operator hereby agrees to accept the following measures/conditions as part of the proposed work.

If the Operator's work changes from that stated in the notification specified above, this Agreement is no longer valid and a new notification shall be submitted to the Department of Fish and Game. Failure to comply with the provisions of this Agreement and with other pertinent code sections, including but not limited to Fish and Game Code Sections 5650, 5652, 5937, and 5948, may result in prosecution.

Nothing in this Agreement authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. A consummated Agreement does not constitute Department of Fish and Game endorsement of the proposed operation, or assure the Department's concurrence with permits required from other agencies.

This Agreement becomes effective the date of Department's signature and terminates December 31, 2002 for project construction only. This Agreement shall remain in effect for

that time necessary to satisfy the terms/conditions of this Agreement.

5.09.432

Exhibit 13
p 2
Fish & Game
1601
agreement

 5-01-437 Fish & Game 1601 Exhibit p3 13

STREAMBED ALTERATION CONDITIONS FOR NOTIFICATION NUMBER: 5-265-00

5. The following provisions constitute the limit of activities agreed to and resolved by this Agreement. The signing of this Agreement does not imply that the Operator is precluded from doing other activities at the site. However, activities not specifically agreed to and resolved by this Agreement shall be subject to separate notification pursuant to Fish and Game Code Sections 1600 et seq.

6. The Operator proposes to alter the streambed to extend the freeway section of State Route 90 (SR-90) to just west of Culver Boulevard (KP R2.8), near the community of Marina Del Rey, in Los Angeles County.

7. The agreed work includes activities associated with No. 2 above. Specific work areas and mitigation measures are described on/in the plans and documents submitted by the Operator, including the Planting Plan and Plant List, which are attached to this agreement, and the Natural Environmental Study Report; mitigation measures shall be implemented as proposed unless directed differently by this agreement.

8. The Operator shall not impact more than 1639 ft^2 (.41 acre). Approximately 1275 ft^2 (.32 acre) are permanent impacts; approximately 364 ft^2 (.09 acre) are temporary impacts.

9. The Operator shall submit a Revegetation/Mitigation plan for Department review within 60 days of signing this Agreement and shall receive Department approval prior to project initiation/impacts. The plan shall include a complete description of the mitigation plan including: identification of one or more specific, onsite habitat restoration (0.73 acres) areas as well as a description of the enhancement areas (0.61 acre); the revegetation plan, including success criteria; and a long-term maintenance and monitoring plan. Revegetation shall use only endemic species.

All mitigation shall be installed as soon as possible, but no later than December 31, 2002.

10. An annual report shall be submitted to the Department by Jan. 1 of each year for 5 years after planting. This report shall describe the status of the revegetation and include, at a minimum, percent cover, the number of plants replaced by species, an overview of the revegetation effort, and the method used to assess these parameters. Photos from designated photo stations shall be included.

11. If after 3 years of monitoring the mitigation meets the 5-year success criteria, AND the Department reviews and approves the mitigation status in writing, the Operator may consider the sites have been successful and cease monitoring.

12. The Operator shall not remove vegetation within the stream from March 1 to August 15 to avoid impacts to nesting birds. However, the Operator may remove vegetation during this time if a qualified biologist conducts a survey for nesting birds within one week of the work, and ensures no nesting birds shall be impacted by the project. If nesting birds are present, no work shall occur until the young have fledged and will no longer be impacted by the project.

13. Access to the work site shall be via existing roads and access ramps.

14. The perimeter of the work site shall be adequately flagged to prevent damage to adjacent riparian habitat.

1601 agreement

5-01-432 Exhibit 13 p4

STREAMBED ALTERATION CONDITIONS FOR NOTIFICATION NUMBER: 5-265-00

15. Structures and associated materials not designed to withstand high seasonal flows shall be removed to areas above the high water mark before such flows occur.

16. Staging/storage areas for equipment and materials shall be located outside of the stream.

17. Spoil sites shall not be located within a stream/lake, where spoil shall be washed back into a stream/lake, or where it will cover aquatic or riparian vegetation.

18. Precautions to minimize turbidity/siltation shall be taken into account during project planning and implementation. This may require that the work site be isolated and/or the construction of silt catchment basins, so that silt, or other deleterious materials are not allowed to pass to downstream reaches. The placement of any structure or materials in the stream for this purpose, not included in the original project description, shall be coordinated with the Department. Coordination shall include the negotiation of additional Agreement provisions.

19. Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous to aquatic life, resulting from project related activities, shall be prevented from contaminating the soil and/or entering the waters of the state. These materials, placed within or where they may enter a stream/lake, by Operator or any party working under contract, or with the permission of the Operator, shall be removed immediately.

20. The Operator shall comply with all litter and pollution laws. All contractors, subcontractors and employees shall also obey these laws and it shall be the responsibility of the operator to ensure compliance.

21. No equipment maintenance shall be done within or near any stream channel where petroleum products or other pollutants from the equipment may enter these areas under any flow.

22. Any equipment or vehicles driven and /or operated within or adjacent to the stream/lake shall be checked and maintained daily, to prevent leaks of materials that if introduced to water could be deleterious to aquatic life.

23. The Operator shall **provide a copy of this** Agreement **to all contractors, subcontractors, and the Operator's project supervisors. Copies of the** Agreement **shall be readily available at work sites at all times during periods of active work** and must be presented to any Department personnel, or personnel from another agency upon demand. **All project personnel shall comply with all terms and conditions of this agreement.**

24. The Department reserves the right to enter the project site at any time to ensure compliance with terms/conditions of this Agreement.

25. The Operator **shall** notify the Department, **in writing, at least five (5) days prior to initiation of construction (project) activities and at least five (5) days prior to completion of construction (project) activities.** Notification shall be sent to the Department at 4949 Viewridge Avenue, CA 92123, Attn: Pam Beare.

26. It is understood the Department has entered into this Streambed Alteration Agreement for purposes of establishing protective features for fish and wildlife. The decision to proceed with the project is the sole responsibility of the Operator, and is not required by this agreement. **It is further agreed all liability and/or incurred cost related to or arising out of the**

EXHIBIT NO. 14
APPLICATION NO. 5-87-424

RECEIVED
Coast Region
MAY 7 2001
CALIFORNIA
COASTAL COMMISSION

applicant's Plant list

PLANT LIST AND PLANTING SPECIFICATIONS

DIST	COUNTY	ROUTE	
07	LA	90	1.2/1.9

DESIGNED LANDSCAPE ARCHITECT
PLANS APPROVAL DATE

HOFFATT & NICHOL ENGINEERS
100 NORTH VINEYARD AVENUE, SUITE 200
ONTARIO, CALIFORNIA 91764

LYNN CARNIVAL INC
3622 CAMPUS DRIVE, SUITE 190
NEWPORT BEACH, CA. 92626

PLANT GROUP	PLANT No	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	QUANTITY EACH	HOLE SIZE (mm) DIA	HOLE SIZE (mm) DEPTH	BASIN TYPE	IRON SULFATE ①	SOIL AMEND ①	COMMERCIAL FERTILIZER ① PLANTING	COMMERCIAL FERTILIZER ① PLT ESTB	MULCH ①	STAKING	PLANTING LIMITS MINIMUM DISTANCE (m) FROM TRAVELWAY	PAVMT	FENCE	WALL	PAVED DITCH	EARTH DITCH	ON CENTER (m)	REMARKS
A	1	•	ATRIPLEX LENTIFORMIS	QUAILBUSH	#1CONT	374	②	②	1	--	--	3-7g TAB	.2kg	.042m3	--	--	--	--	--	--	--	④	SHRUB
	2	⊙	SCHINUS MOLLE	CALIF. PEPPER	#1CONT	161	250	②	1	--	④	3-7g TAB	.2kg	.065M3	⑤	12.5		9.5	7.5	6	7	④	TREE
B	3	①	MYOPORUM LAETUM	MYOPORUM	#5 CONT	61	500	②	1	--	⑤	8-7g TAB	.2kg	.042m3	--	9.5	--	6	6	6	7	④	SHRUB
	4	⊕	RHAPHOLEPIS INDICA	INDIAN HAWTHORNE	#5 CONT	57	500	②	1	--	⑤	8-7g TAB	.2kg	.042m3	--	--	2.5	3	3	2.5	3	④	SHRUB
	5	◎	XYLOSMA CONGESTUM	XYLOSMA	#5 CONT	17	500	②	1	--	⑤	8-7g TAB	.2kg	.042m3	--	--	4.5	4.5	3	3	3.5	④	SHRUB
D	6	▨	SCIRPUS SPP.	BULRUSH	ROOT CLUMP	953	②	②	--	--	⑥	1-7g TAB	.2kg	--	--	--	--	--	--	--	--	1.52	SHRUB
	7	▨	TYPHA SPP.	CATTAILS	ROOT CLUMP	953	②	②	--	--	⑥	1-7g TAB	.2kg	--	--	--	--	--	--	--	--	1.52	SHRUB
H	8	▨	CARPOBROTUS EDULIS	HOTTENTOT FIG	CUTTING	18,994	--	--	--	--	⑥	3.8kg/100m2	2.1kg/100m2	--	--	--	2	2	2	2	2.5	.3048	SHRUB
W	9	•	SALIX SPP.	WILLOW	CUTTING	538	②	②	--	--	④	1-7g TAB	.2kg	--	--	--	--	--	--	--	--	④	SHRUB
	10	●	BACCHARIS SALICIFOLIA	MULEFAT	CUTTING	310	②	②	--	--	⑥	1-7g TAB	.2kg	--	--	--	--	--	--	--	--	④	SHRUB

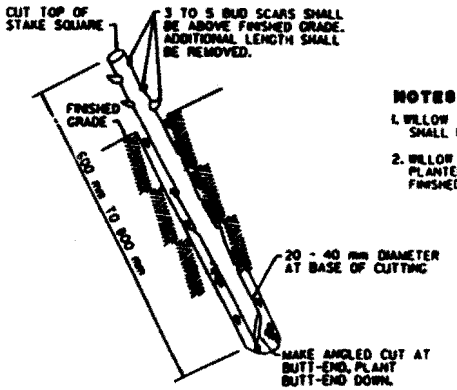
APPLICABLE WHEN CIRCLED:

① - Quantities shown are 'per plant' unless shown as m² application rates.
② - Sufficient to receive root ball.
③ - Does not apply to mulch areas.
④ - As shown on plans.
⑤ - Unless otherwise shown on plans.
⑥ - See detail.
⑦ - See Special Provisions.
⑧ - Soil Amendments - Per 93m2
3m3 Nitrolized wood shavings
Fertilizer (Per Specification)
⑨ - Backfill Mix
6 Parts Topsoil (by volume)
4 Parts Nitrolized wood shaving (By volume)
Fertilizer (Per Specification)

LEGEND:

▨ WILDFLOWER MIX HYDROSEED - REFER TO SPECIFICATION
214m2 TOTAL AREA - SEE HP-9, HP-10 & HP-11 FOR LOCATION.

NOTE:
CONTRACTOR TO STOCKPILE TOPSOIL (75mm DEPTH) AND REUSE TO RESTORE EXISTING WETLANDS AREAS IMPACTED BY NEW CONSTRUCTION.



SECTION
LIVE WILLOW AND BACCHARIS CUTTINGS
NO SCALE

NOTES:
1. WILLOW AND BACCHARIS CUTTINGS SHALL PROTRUDE ABOVE FINISHED GRADE.
2. WILLOW AND BACCHARIS CUTTINGS SHALL BE PLANTED WITH 80% OF THEIR LENGTH BENEATH FINISHED GRADE.

NOTE:
Underlined portions of botanical name indicate abbreviations used on Planting Plans.

ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE SHOWN.

PLANT LIS
HP-

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
Caltrans LANDSCAPE ARCHITECTURE
DESIGN OVERSIGHT: ED BOLL
CALCULATED/DESIGNED BY
CHECKED BY
DATE REVISED
REVISED BY

EXHIBIT NO. 15

APPLICATION NO.

5-01-432

Wetland mitigation

Metro

DIST	COUNTY	ROUTE	
07	LA	90	1.2/1.9

LICENSED LANDSCAPE ARCHITECT

PLANS APPROVAL DATE

HOFFMAN & MCKIM, ENGINEERS
485 NORTH VINEYARD AVENUE, SUITE 200
ONTARIO, CALIFORNIA 91764

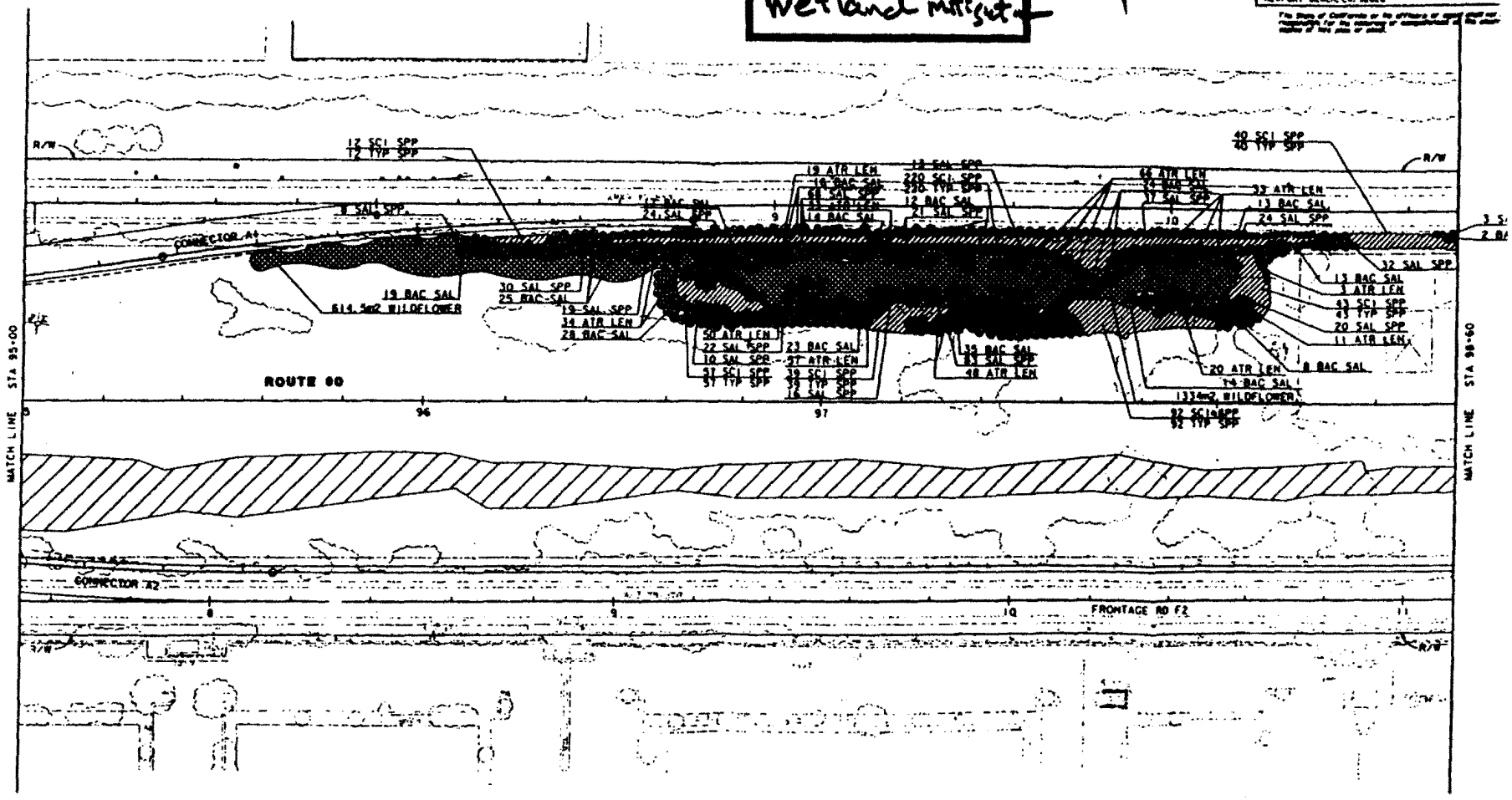
LYNN CAPOUTA, INC
3022 CAMPUS DRIVE, SUITE 100
NEWPORT BEACH, CA. 92626

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION

Caltrans LANDSCAPE ARCHITECTURE

DESIGN OVERSIGHT: ED BOLL

CALCULATED/DESIGNED BY | DATE | REVISED BY | DATE REVISED | CHECKED BY



SEE SHEET HP-20 FOR IRRIGATION PLAN FOR THIS AREA

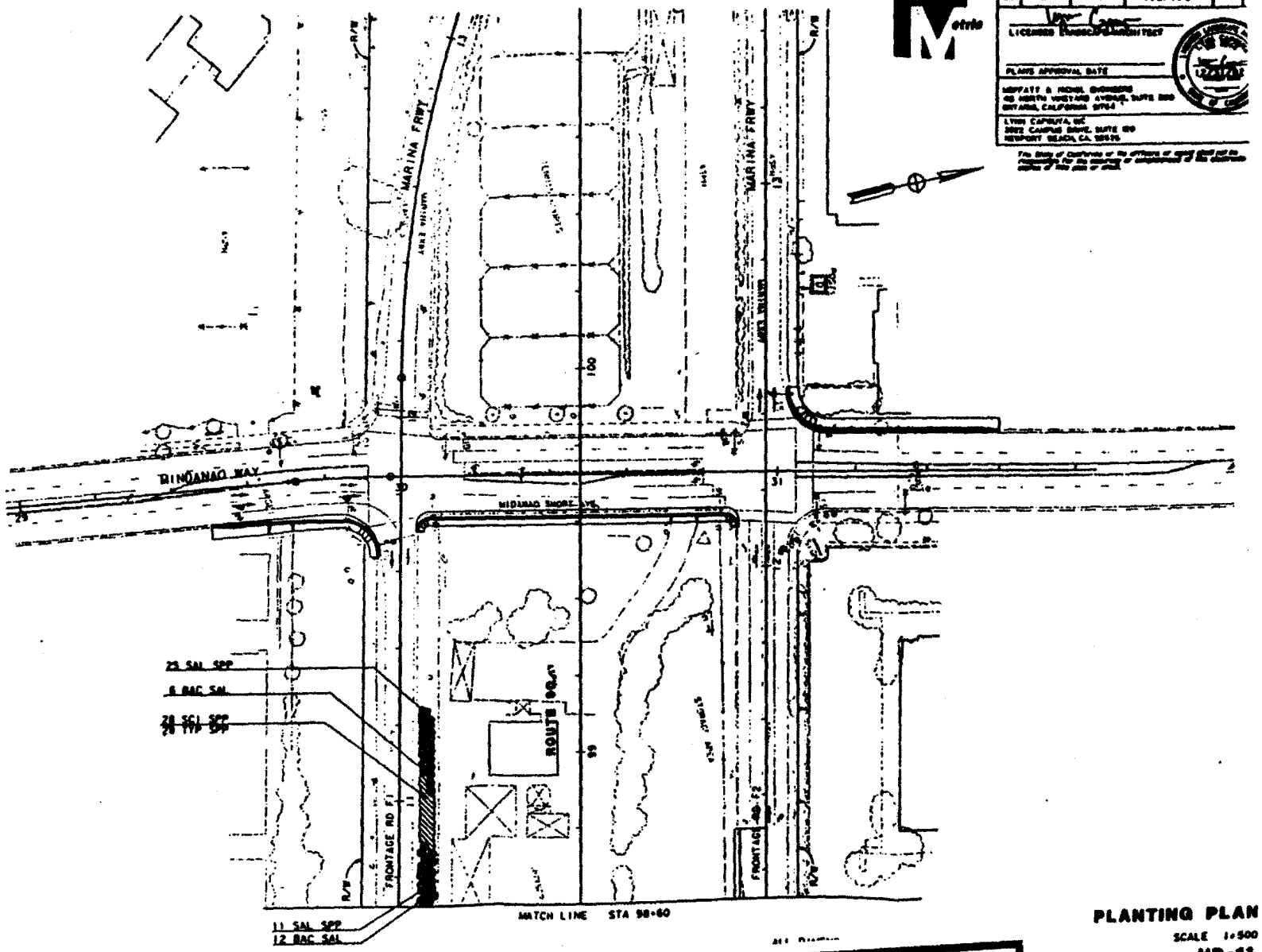
ALL DIMENSIONS ARE IN METERS UNLESS OTHERWISE SHOWN.

FOR REDUCED PLANS ORIGINAL 0 20 40 60 80

PLANTING PLAN

SCALE 1:500

HP-10



STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
LANDSCAPE ARCHITECTURE
DESIGN OVERSIGHT: ED BOLL
CALCULATED/DESIGNED BY
CHECKED BY
DATE REVISED BY
DATE REVISED

DIST	COUNTY	ROUTE	
07	LA	90	1.2/1.9

LICENSED LANDSCAPE ARCHITECT
PLANS APPROVAL DATE

PLANTING PLAN

SCALE 1:500

HP-11

SEE SHEET HP-21 FOR IRRIGATION PLAN FOR THIS AREA

EXHIBIT NO. 15 f 2
APPLICATION NO.
5-01-432

EXHIBIT NO. 16
APPLICATION NO.
5-01-432
Rt 90 Bridge

E

Bridge View

DIST	COUNTY	ROUTE	KILOMETER POST NOTAL PROJECT	SHEET NO.
07	LA	90	1.2/1.9	

REGISTERED CIVIL ENGINEER

8-31-2000
PLANS APPROVAL DATE

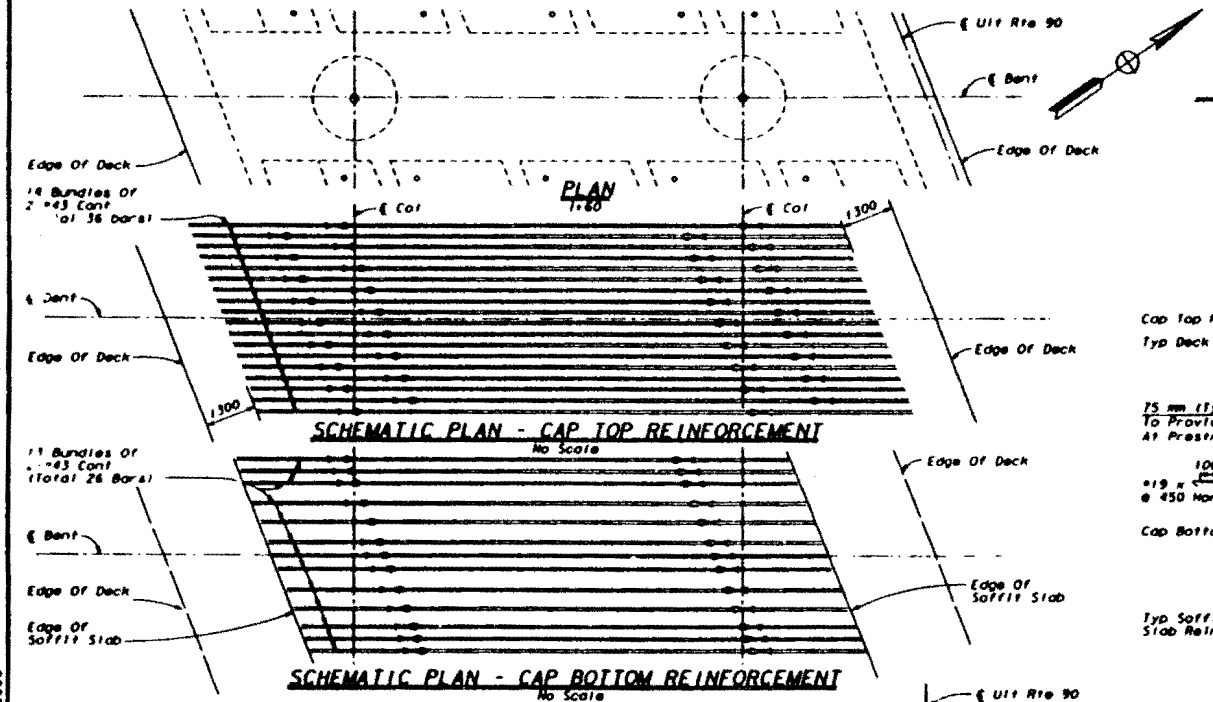
MOFFATT & NICHOL, ENGINEERS
SANTA ANA, CALIFORNIA

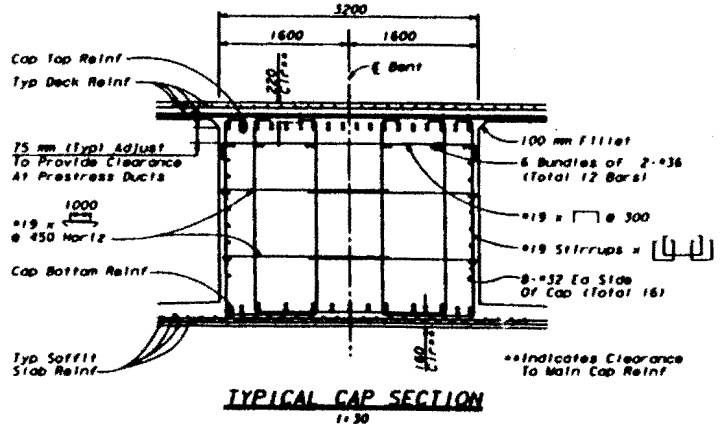
THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET

Note: Lap Splices Not Permitted In Bent Cap Main Top And Bottom Reinf

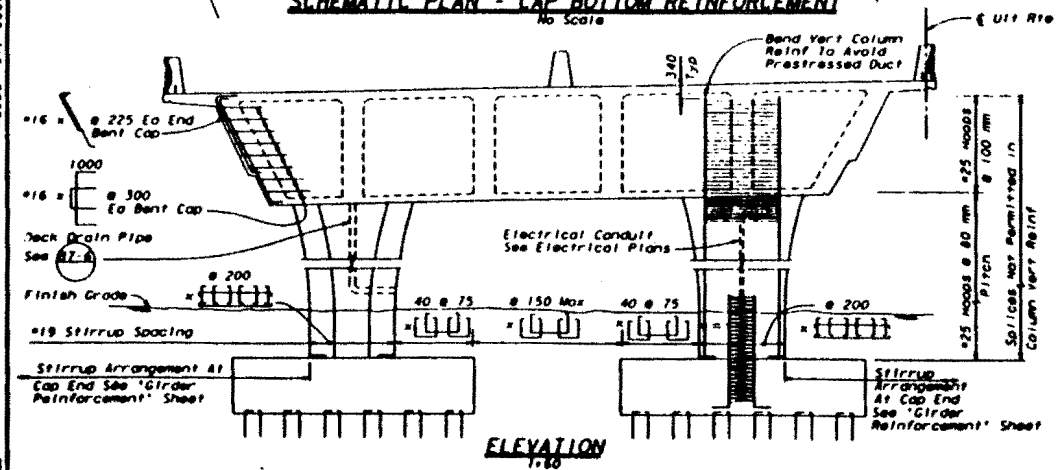
Indicates Bundled Bars

Metric

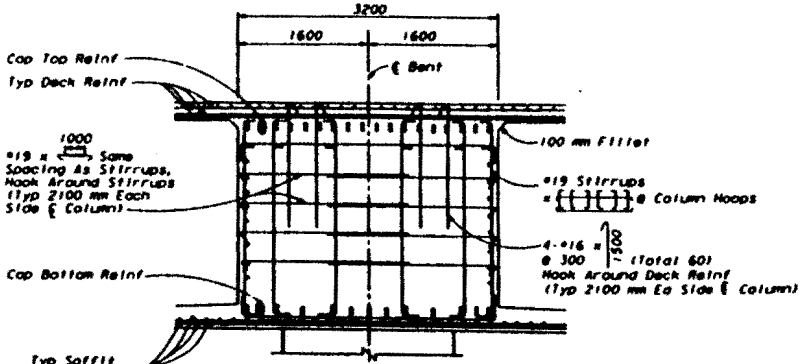




TYPICAL CAP SECTION
1:50



ELEVATION
1:60



CAP SECTION AT COLUMN
1:50

AUGUST 31, 2000

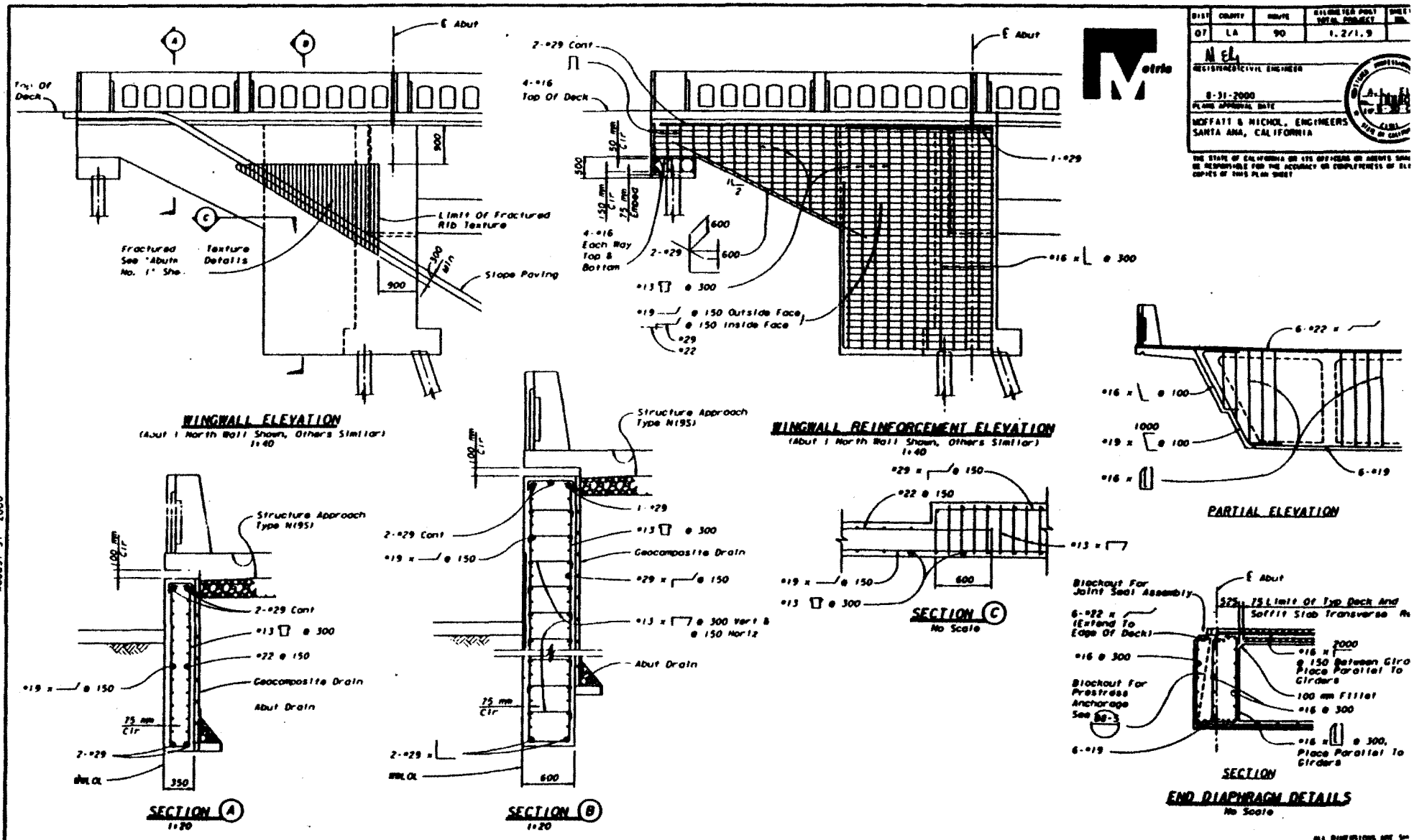
DESIGN	DESAI	DRAWN	WANG	PREPARED FOR THE STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION	CULVER BLVD UNDERCROSSING
DETAILS	MAI	CHECKED	DESAI		BENT DETAILS NO. 1
QUANTITIES	DESAI		WANG	CU 07219	BRIDGE NO. 53-2906 POST MILE 1.6 AHEAD 2.5

ORIGINAL SCALE IN MILLIMETERS

ALL DIMENSIONS ARE IN MILLIMETERS, EXCEPT AS

Exhibit 18
p 2

Bridge Views and
Bridge elevation



DIST	COUNTY	ROUTE	KILOMETER POST / MILE POST	SHEET NO.
07	LA	90	1.2/1.9	

REGISTERED CIVIL ENGINEER

8-31-2000
PLANS APPROVAL DATE

THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET

MOFFATT & NICHOL, ENGINEERS
SANTA ANA, CALIFORNIA

AUGUST 31, 2000

DESIGN	DESAI	WANG
DETAILS	MAI	DESAI
QUANTITIES	DESAI	WANG

PREPARED FOR THE
STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION

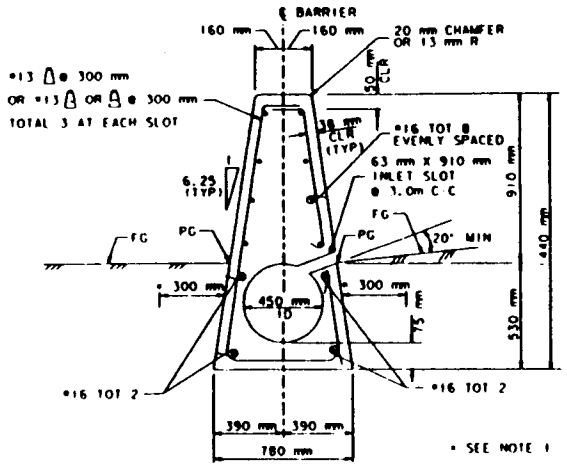
CU 07279
EA 169511

BRIDGE NO. 53-2906
POST MILE 1.6
AHEAD 2.5

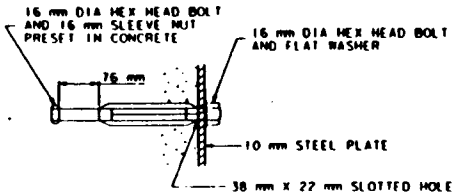
CULVER BLVD UNDERCROSSING
ABUTMENT DETAILS NO. 3

Exhibit 16
63
5-01.422

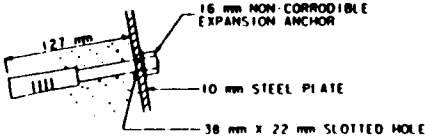
Bridge view rail



CONCRETE BARRIER (TYPE 60W)

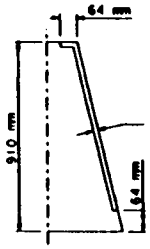


DETAIL "B"

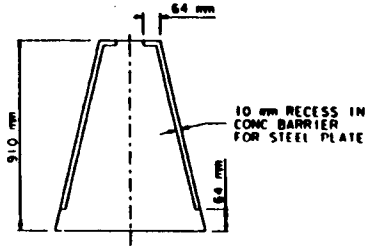


ALTERNATE DETAIL "B"

CLOSURE PLATE ANCHOR BOLT DETAILS



CLOSURE PLATE DETAIL



RECESS DETAIL

DIST	COUNTY	ROUTE	KILOMETER POST TOTAL PROJECT	SHEET NO.	TOTAL SHTS
07	LA	90	1.9/R2.9		

REGISTERED CIVIL ENGINEER — EXP 9/30

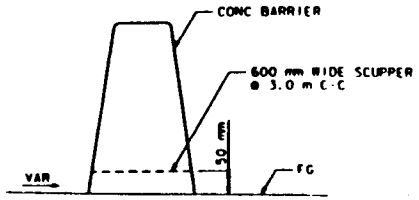
PLANS APPROVAL DATE

MOFFATT & NICHOL ENGINEERS
405 NORTH VINEYARD AVENUE, SUITE 200
ONTARIO, CALIFORNIA 91764

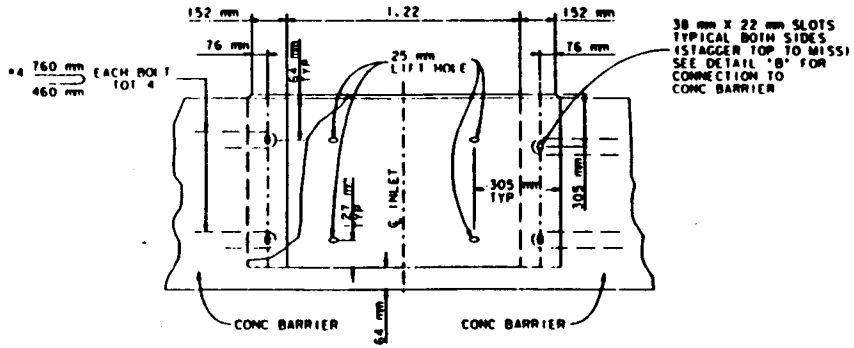
REGISTERED CIVIL ENGINEER — M.A. GRAHAM — No. 49530 — Exp. 6-30-91 — CIVIL

NOTES

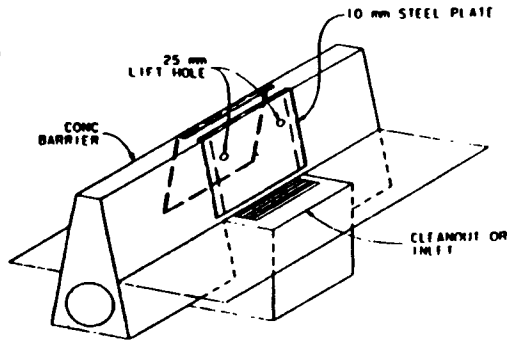
1. WHERE NECESSARY, SLOPE PAVEMENT TO MATCH INLET SLOT FLOW LINE.
2. FOR DETAILS AND DIMENSIONS NOT SHOWN, SEE CONCRETE BARRIER (TYPE 60).
3. PLACE INLET SLOTS ONLY ON THAT BARRIE SIDE WHERE FINISHED GRADE CROSS SLOPE IS DOWNWARD TOWARD BARRIER.



CONCRETE BARRIER SCUPPER DETAIL



SIDE VIEW



ISOMETRIC VIEW

STEEL CLOSURE PLATE DETAIL

CONCRETE BARRIER (TYPE 60W), STEEL CLOSURE PLATE DETAIL AND CONCRETE BARRIER SCUPPER DETAIL

CONSTRUCTION DETAILS

ALL DIMENSIONS ARE IN mm UNLESS

C-29

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION
DESIGN OVERSIGHT
FERADE S. MESFIN
CALCULATED/DESIGNED BY
CHECKED S
DATE REVISED BY
DATE REVISED

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-6610
(213) 897-0703

September 19, 2001

Ms. Pam Emerson
California Coastal Commission
South Coast District
200 Oceangate, 10th Floor
Long Beach, CA 90802-4325

RE: Proposed Culver Boulevard Project at State Route 90 (Marina Del Rey Freeway), Los Angeles, CA (CDP 5-01-038)

Dear Ms. Emerson,

Per your request, the following paragraph and supporting documents should fulfill your request for more information regarding funding for the proposed Culver Boulevard Project at State Route 90 (Marina Del Rey Freeway), Los Angeles County, CA.

Budgetary Information

Attached is the budgetary information for the above-mentioned project. These two sheets (one for EA 169311 is for the portion of the project to modify the Centinela Avenue Interchange, which is mostly outside of the Coastal Zone; one for EA 169321 is for the portion of the project to construct the undercrossing at Culver Boulevard, which is inside the Coastal Zone). Please note that the Fund Source 1 of 1 indicates that the money will be from the State Transportation Improvement Program (STIP, see attached sheets explaining this funding program). As mentioned, the California Transportation Commission adopted the STIP in June 1998. If another funding source (including, but not limited to local government agencies) would be identified on this form. No other funding source is identified, therefore, the STIP is the only funding source for this project. In addition, we are providing two diagrams explaining the STIP Fund Allocation and the STIP Process.

Definition of LA-90

As defined in Section 390 in the Streets and Highways Code, Route 90 is from Route 1 northwest of the Los Angeles International Airport to Route 91 in Santa Ana Canyon passing near La Habra (see attached sheets).

Legislative History of the Road

Route 90 was added to the State Highway System in 1947 and is called the Marina Expressway (access controlled) from Route 1 (Lincoln Boulevard) to Ballona Creek. Route 90 was designed and build by State Funding by contracts administered by the State with work by General Contractors (some Federal funding may have been used). The California Department of Transportation owns, operates and maintains the short segment of Route 90 from Route 1 to Slauson Avenue. However, we question the relevance of this request.

Caltrans Plan for This Roadway Segment

Caltrans has no specific master plan for this or any freeway / expressway. Caltrans' process indicates that as needs are identified, they are forwarded to the California Transportation Commission (CTC) for prioritization and funding. Because of the need generated by work and recreational congestion, this project has been funded as a highly needed project by the CTC. In addition, Caltrans is not in the real estate business, and is legally mandated by law to dispose of unnecessary real estate. This area was designated as needed for this project since it was built in 1972.

Ambient Growth in Area

The Southern California Association of Governments growth projections indicate that a minimum of two percent per year of growth is expected in this area. The project is needed to maintain the current traffic capacity by accommodating continuing growth. Caltrans will continue to pursue more traffic growth information, and will provide it in the immediate future.

Project Alternatives

A full range of alternatives were considered, prior to selecting this alternative which was considered the Least Environmentally Damaging Practicable Alternative.

Your assistance in bringing this project before the Coastal Commission in October 2001 is greatly appreciated. If you have any questions or require additional information, please contact me at (213) 897-0703.

Sincerely,

Ronald Kosinski

Ronald J. Kosinski
Deputy District Director
Division of Environmental Planning
Caltrans District 7

5

EXHIBIT NO. 18
APPLICATION NO.
5-01-432
Traffic info

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION, AND HOUSING AGENCY

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 897-4610
(213) 897-0686

RECEIVED
South Coast Region

AUG 17 2001

CALIFORNIA
COASTAL COMMISSION

August 16, 2001

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

File: LA-90
EA 1693U1
PM 1.2/1.8

Subject: Information to fulfill the final requirements for Coastal Development Permit 5-01-038. (Rt. 90 widening between Mindanao Way and Ballona Creek, Palms-Mar Vista-del-Rey, City of Los Angeles County.)

Dear Ms. Emerson,

Enclosed is the information you requested to finalize the pending Coastal Development Permit Application for the above listed Caltrans project.

Purpose and Need of the project

The project is proposed to relieve traffic congestion and improve safety by extending the Route 90-freeway section across Culver Blvd. It is needed to address existing and forecasted congestion levels due to the increased development in the area. The project will also alleviate congestion-related accidents that are expected to increase as congestion increases, should this project not be developed.

Traffic

Traffic volumes are projected to increase significantly along Route 90 due to ongoing and planned development as well as regional growth, to the extent that design year traffic demands are projected to substantially exceed capacity at a number of intersections without improvements. Currently there are over 200 proposed developments in the general area of the Route 90 corridor, which include Playa Vista (Phase I and II), the Marina del Rey Local Coastal Plan update, and the LAX Master Plan.

The following chart illustrates the statistics for the existing Level-of-Service at the Culver Boulevard/State Route 90 intersection.

Intersection	Peak Hour	Existing Conditions
Culver Blvd. @ SR90 EB Culver Blvd. @ SR90 WB	AM Peak Hour	LOS D (0.90) LOS C (0.79)
Culver Blvd. @ SR90 EB Culver Blvd. @ SR90 WB	PM Peak Hour	LOS E (0.95) LOS F (1.13)

Water Quality

The percentage of Route 90 runoff contributing to the defined wetland area is very small compared to the total surface runoff reaching the wetland. However, Caltrans is willing to incorporate fossil filters into the project to ensure that high levels of water quality are maintained in the area.

- Please see the attached drainage plans with the locations highlighted of where fossil filters will be utilized for the project, as well as a design of a Fossil Filter component.
- Please see the attached Fossil Filter literature taken from the manufacturers website (www.kristar.com/)

Project Funding

One hundred percent (100%) of the financing for construction for the proposed project will come from the Flexible Congestion Relief (FCR) funds through the Statewide Transportation Improvement Program (Caltrans funds). Because the project is being jointly funded, the City of Los Angeles will be responsible for one hundred percent (100%) of the design engineering. Caltrans will also be responsible for any project oversight cost.

The following items have also been included for your review:

- (1) 8 1/2 x 11 copy and (1) 11 x 17 copy of project profile plans, contour grading plans, and layout plans
- Wetlands exhibit which includes the increase in the mitigation amount

We trust that we have provided the additional information you required to finalize our application. Your assistance with bringing this project before the Coastal Commission is greatly appreciated.

EXHIBIT NO. 16 p3
APPLICATION NO.
5-01-432

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

Sincerely,

Gary Iverson FOR

Aziz Elattar, Senior Environmental Planner
Division of Environmental Planning

Enclosures

CITY OF LOS ANGELES

CALIFORNIA

RICHARD J. RIORDAN
MAYOR

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
VITALY B. TROYAN, P.E.
CITY ENGINEER
650 SOUTH SPRING ST., SUITE 200
LOS ANGELES, CA 90014-1911

January 17, 2001

Stephanie Reeder
Coastal Commission Liaison
CalTrans District 7
120 S Spring St
Los Angles, CA 90012-3606

Dear Ms. Reeder:

PLAYA VISTA PHASE IA TRANSPORTATION MITIGATION MEASURES – SR90 E/O CENTINELA AVE TO E/O MINDANAO WY (CITY ENGINEER COASTAL PERMIT CDP01-01, WORK ORDER BD401335)

The City of Los Angeles issues Coastal Development Permits for development within the City's coastal zone under authority of the California Coastal Act, Section 30600(b) of the California Public Resources Code and under Chapter 1, Article 2, Section 12.20.2 of the Los Angeles Municipal Code. However, Municipal Code Section 12.20.2.C.1. states in part that, "The provisions of this Section shall not apply to . . . . . any development by a public agency for which a local permit is not otherwise required . . . ."

It appears that a local permit is not otherwise required for the work shown on the "Project Plans for Construction on State Highway in Los Angeles County in Los Angeles from 0.4 km east of Centinela Avenue Undercrossing to 0.3 km east of Mindanao Way." Therefore the work does not require a Coastal Development Permit from the City of Los Angeles. For purposes of any review by the California Coastal Commission, we herewith give our conceptual approval.

If you have any questions in this matter, please contact Mr. Jim Doty at (213) 847-8694.

Sincerely,

James E. Doty
Environmental Supervisor II
Environmental Group

JD:CDP0101_nonjurisdiction.doc
Enclosed: 1st Sheet of Plans marked "Approved in Concept"

Cc (with copy of plans): Pam Emerson
California Coastal Commission
South Coast Area
200 Oceangate, 10TH Floor
Long Beach, CA 90802-4416

Cc: Catherine Tyrrell, Playa Vista Capital LLC
12555 W Jefferson Blvd., Ste 300
Los Angeles, CA 90066

EXHIBIT NO. 19
APPLICATION NO.
5-01-432

Table V.L.1-1

VEHICULAR LEVELS OF SERVICE AT SIGNALIZED INTERSECTIONS

Level of Service	Description	Volume/Capacity (V/C) Ratio[a]
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	0.00-0.60 (of capacity)
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can be generally described as very good.	0.61-0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver may occasionally have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71-0.80
D	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81-0.90
E	Capacity occurs at Level of Service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting up-stream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91-1.00
F	Level of Service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	)1.00

Source: Highway Research Board, "Highway Capacity Manual," Special Report 87, 1965.

[a] *Capacity is defined as Level of Service E.*

EXHIBIT NO. 20
APPLICATION NO.
5-01-432

1990 levels of service

Table V.L.1-6

1997 INTERSECTION OPERATING CONDITIONS – FIRST PHASE

Intersection		Period	1990 Existing V/C	1990 Existing LOS	1997 Future without Project [a] V/C	1997 Future without Project [a] LOS	1997 Future with Project [b] V/C	1997 Future with Project [b] LOS	Impact V/C
City of Los Angeles (continued)									
Centinela	Marina Fwy WB Ramps	a.m.	0.710	C	0.863	D	1.075	F	0.212[c]
		p.m.	0.733	C	0.915	E	0.975	E	0.060[c]
Centinela	Mesmer	a.m.	0.489	A	0.562	A	0.769	C	0.207[c]
		p.m.	0.333	A	0.439	A	0.575	A	0.136[c]
Centinela	Teale	a.m.	0.379	A	0.426	A	0.755	C	0.329[c]
		p.m.	0.321	A	0.406	A	0.642	B	0.236[c]
Century	Sepulveda	a.m.	0.529	A	0.812	D	0.837	D	0.025[c]
		p.m.	0.734	C	1.058	F	1.087	F	0.029[c]
Culver	Inglewood	a.m.	0.837	D	0.953	E	0.987	E	0.034[c]
		p.m.	0.803	D	0.971	E	0.971	E	0.000
Culver	Jefferson	a.m.	1.041	F	1.199	F	1.281	F	0.082[c]
		p.m.	0.923	E	1.029	F	1.087	F	0.058[c]
Culver	Marina Fwy EB Ramps	a.m.	1.323	F	1.679	F	1.719	F	0.040[c]
		p.m.	0.943	E	1.265	F	1.281	F	0.016[c]
Culver	Marina Fwy WB Ramps	a.m.	0.834	D	1.115	F	1.128	F	0.013[c]
		p.m.	1.036	F	1.474	F	1.527	F	0.053[c]

[a] *Existing plus Ambient Growth of 1.5 percent per year plus traffic from Related Projects and committed roadway improvements.*

[b] *Existing plus Ambient Growth of 1.5 percent per year plus traffic from Related Projects plus First Phase Subdivision of Playa Vista.*

[c] *Denotes significant impact.*

EXHIBIT NO. 21
APPLICATION NO. A-3
5-01-482
LOS

Table V.L.1-6

1997 INTERSECTION OPERATING CONDITIONS -- FIRST PHASE

Intersection		Period	1990 Existing V/C	1990 Existing LOS	1997 Future without Project [a] V/C	1997 Future without Project [a] LOS	1997 Future with Project [b] V/C	1997 Future with Project [b] LOS	Impact V/C
City of Los Angeles (continued)									
Lincoln	Marina Fwy Extension	a.m.	0.763	C	0.975	E	1.044	F	0.069[c]
		p.m.	0.804	D	1.151	F	1.207	F	0.056[c]
Lincoln	Maxella	a.m.	0.625	B	0.873	D	0.931	E	0.058[c]
		p.m.	0.818	D	1.202	F	1.270	F	0.068[c]
Lincoln	Rose	a.m.	0.803	D	0.998	E	1.018	F	0.020[c]
		p.m.	0.873	D	1.223	F	1.247	F	0.024[c]
Lincoln	Sepulveda	a.m.	1.050	F	1.095	F	1.145	F	0.050[c]
		p.m.	1.213	F	1.124	F	1.201	F	0.077[c]
Lincoln	Teale	a.m.	0.858	D	1.032	F	1.168	F	0.136[c]
		p.m.	0.788	C	1.081	F	1.170	F	0.089[c]
Lincoln	Venice	a.m.	0.966	E	1.018	F	1.052	F	0.034[c]
		p.m.	1.075	F	1.311	F	1.358	F	0.047[c]
Lincoln	Washington	a.m.	0.977	E	1.364	F	1.415	F	0.051[c]
		p.m.	1.105	F	1.534	F	1.582	F	0.048[c]
Main	Rose	a.m.	0.658	B	0.790	C	0.790	C	0.000
		p.m.	0.887	D	1.088	F	1.088	F	0.000

[a] *Existing plus Ambient Growth of 1.5 percent per year plus traffic from Related Projects and committed roadway improvements.*

[b] *Existing plus Ambient Growth of 1.5 percent per year plus traffic from Related Projects plus First Phase Subdivision of Playa Vista.*

[c] *Denotes significant impact.*

EXHIBIT NO. 22
APPLICATION NO.
LCP 1995
5-01-432

TABLE 10

TRAFFIC IMPACT ANALYSES RESULTS
LEVEL OF SERVICE COMPARISONS

SCENARIO A - FUTURE BACKGROUND TRAFFIC (WITH REVISED RELATED PROJECTS)

INTERSECTION	AM PK HOUR V/C	AM PK HOUR LOS	PM PK HOUR V/C	PM PK HOUR LOS
Marina Fwy EB & Culver	1.469	F	1.201	F
Marina Fwy WB & Culver	0.989	E	1.308	F
Lincoln Bl & Jeferson Bl	1.211	F	1.228	F
Lincoln Bl & Teale St	1.034	F	1.072	F
Centinela & Marina Fwy EB	0.682	B	0.681	B
Centinela & Marina Fwy WB	0.989	E	0.901	E
Centinela & Jefferson	1.044	F	0.967	E
Inglewood & Jefferson	0.924	E	0.879	D
Teale St & Centinela	0.641	B	0.764	C
Mesmer & Jefferson	0.523	A	0.602	B
Sepulveda & Centinela	1.456	F	1.332	F
I-405 NB Ramps & Jefferson	0.856	D	0.977	E
I-405 SB Ramps & Jefferson	0.751	C	0.769	C

SCENARIO Ba - FUTURE BACKGROUND PLUS PHASE I APPROVED PROJECT TRAFFIC

INTERSECTION	AMPK HOUR V/C	AMPK HOUR LOS	PM PK HOUR V/C	PM PK HOUR LOS	DELTA AM	DELTA PM	W/ MITIGN AM V/C	W/ MITIGN PM V/C	DELTA W/MIT. AM	DELTA W/MIT. PM
Marina Fwy EB & Culver	1.509	F	1.217	F	0.040	0.016	0.632	0.657	-0.837	-0.544
[illegible] Fwy WB & Culver	1.002	F	1.361	F	0.013	0.053	0.579	1.024	-0.410	-0.284
[illegible] Bl & Jeferson Bl	1.402	F	1.383	F	0.191	0.155	1.058	1.038	-0.153	-0.190
Lincoln Bl & Teale St	1.168	F	1.179	F	0.134	0.107	0.716	0.699	-0.318	-0.373
Centinela & Marina Fwy EB	0.821	D	0.871	D	0.139	0.190	0.552	0.724	-0.130	0.043
Centinela & Marina Fwy WB	1.263	F	0.961	E	0.274	0.060	0.933	0.702	-0.056	-0.199
Centinela & Jefferson	1.754	F	1.482	F	0.710	0.515	0.952	0.948	-0.092	-0.019
Inglewood & Jefferson	1.248	F	1.143	F	0.324	0.264	0.831	0.819	-0.093	-0.060
Teale St & Centinela	0.974	E	1.048	F	0.333	0.284	0.787	0.598	0.146	-0.166
Mesmer & Jefferson	0.796	C	0.763	C	0.273	0.161	0.472	0.617	-0.051	0.015
Sepulveda & Centinela	1.678	F	1.417	F	0.222	0.085	1.426	1.199	-0.030	-0.133
I-405 NB Ramps & Jefferson	1.158	F	1.333	F	0.302	0.356	0.870	0.981	0.014	0.004
I-405 SB Ramps & Jefferson	0.913	E	1.065	F	0.162	0.296	0.718	0.579	-0.033	-0.190

SCENARIO Bp - FUTURE BACKGROUND PLUS PHASE I TRAFFIC WITH PROPOSED 1F EMT USE

INTERSECTION	AM PK HOUR V/C	AM PK HOUR LOS	PM PEAK HOUR V/C	PM PEAK HOUR LOS	DELTA AM	DELTA PM	W/ MITIGN AM V/C	W/ MITIGN PM V/C	DELTA W/MIT. AM	DELTA W/MIT. PM
Marina Fwy EB & Culver	1.491	F	1.209	F	0.022	0.008	0.684	0.657	-0.785	-0.544
Marina Fwy WB & Culver	0.994	E	1.335	F	0.005	0.027	0.609	1.078	-0.380	-0.230
Lincoln Bl & Jeferson Bl	1.385	F	1.361	F	0.174	0.133	1.034	1.018	-0.177	-0.210
Lincoln Bl & Teale St	1.182	F	1.168	F	0.148	0.096	0.728	0.698	-0.306	-0.374
Centinela & Marina Fwy EB	0.761	C	0.789	C	0.079	0.108	0.448	0.682	-0.234	0.001
Centinela & Marina Fwy WB	1.195	F	0.923	E	0.206	0.022	0.898	0.673	-0.091	-0.228
Centinela & Jefferson	1.433	F	1.391	F	0.389	0.424	0.975	0.895	-0.069	-0.072
Inglewood & Jefferson	1.278	F	1.169	F	0.354	0.290	0.845	0.819	-0.079	-0.060
[illegible] & Centinela	0.806	D	0.918	E	0.165	0.154	0.657	0.548	0.016	-0.216
[illegible] & Jefferson	0.758	C	0.781	C	0.235	0.179	0.452	0.632	-0.071	0.030
Sepulveda & Centinela	1.609	F	1.389	F	0.153	0.057	1.373	1.192	-0.083	-0.140
I-405 NB Ramps & Jefferson	1.151	F	1.288	F	0.295	0.311	0.86[illegible]	0.946	0.008	-0.031
I-405 SB Ramps & Jefferson	0.857	D	1.018	F	0.106	0.249	0.679	0.568	-0.072	-0.201

Exhibit 23 adopted Playa Vista Phase I mitigation

- Jefferson and I-405 Northbound (Alternate Measure)
  As described in the Amendment to the LADOT Assessment Letter (Please see Appendix Y- of the Final EIR, Volume XXI), an alternative mitigation would provide the following improvements in lieu of the northbound on-loop proposed above:

  - Lincoln and Culver: Provide a new interchange in the southeast quadrant of Lincoln Boulevard and Culver Boulevard that would provide two separate roadways connecting northbound Lincoln Boulevard to eastbound Culver Boulevard and eastbound/westbound Culver Boulevard to northbound Lincoln Boulevard; with new traffic signal and signal timing so as not to impede north bound traffic on Lincoln Boulevard. Provide improvements to Culver Boulevard bringing it to one through lane and one left turn lane in the westbound direction. Provide three through lanes and one right turn lane northbound along Lincoln Boulevard at the interchange.

  - Bay Street Bridge: Connect Bay Street across the Ballona Channel to Culver Boulevard by constructing the Bay Street bridge over Ballona Channel to provide two traffic lanes in each direction. Provide one bike lane in each direction southerly from the Ballona Creek Bridge and provide access to the existing bike path along Ballona Creek.

  - Culver and Bay: Widen Culver Boulevard between Bay Street and the Marina Freeway to provide two through lanes and two left turn lanes westbound and one through and one through-right turn lane eastbound. Widen eastbound Culver Boulevard an additional 12 feet to provide two through lanes from the Lincoln Boulevard bridge to a point east of the new signal at the ramp connection to Lincoln Boulevard.

  - Culver and Marina Freeway: Guarantee construction of a 56-footwide three-lane westbound portion (or as an interim measure, two lanes in each direction) of a grade-separated interchange at Culver Boulevard and the 90 Freeway, with new freeway lane striping easterly to a point beyond the Ballona Creek Channel Bridge, all to the satisfaction of Caltrans.

  - Jefferson and Westlawn: Contribute to the design and construction of ATSAC. This measure would replace the measures listed on page V.L.1-96.

  - Jefferson and I-405 Northbound: Widen the north side of Jefferson by up to 8 feet. Widen the northbound on-ramp to provide for three lanes.

EXHIBIT NO. 24
APPLICATION NO.
5-01-182
Revised Traffic

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

• = In coastal zone

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 sf community serving	• 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 sf community serving	• 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 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	• 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
1D	West end of Area D, north and south of Jefferson Boulevard	846 du 20,000 nsf office 25,000 sf community serving	• 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) • 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
1E	West end of Area D, north of Jefferson Boulevard	350,000 nsf office 5,000 nsf of retail	• 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 Juniene Street • Centinela/Culver • Centinela/Short • Culver/Inglewood • Manchester/Pershing • Marina Freeway eastbound/Mindanao • Marina Freeway westbound/Mindanao • Centinela/Jefferson (complete intersection improvements)
1F	East end of Area D	850,000 nsf office 10,000 nsf retail 300 hotel rooms 55,000 sf community serving	• Option B improvements to Centinela Avenue between the Marina Freeway and Juniene Street • Complete construction of "E" Street from 9th Street to Centinela 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 and Mesmer Avenue • Widen Jefferson between Centinela 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 sf of office space in 1F • Centinela/La Cienega • Centinela/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.

Areas A, B and C

19. Realign and extend Culver Blvd. as a six-lane divided road. The County Road Department has proposed that the sharp "S" curve on Culver just west of Lincoln be eliminated and a new bridge be constructed across Ballona Creek (west of the existing bridge). Jefferson would then intersect Culver at a right angle. Six lanes will be provided between the Culver-Lincoln Blvd. interchange and Jefferson Blvd. with eight lanes from Lincoln to Route 90. At the suggestion of the Natural History Museum, water flow under Culver Blvd. will be increased by additional culverts in order to improve the natural functioning of the wetlands.

20. Design and construct new roads in an environmentally sensitive manner which recognizes the preservation of the Ballona Wetlands and other significant habitat areas.

21. Extend Admiralty Way on a curved alignment to the new Culver Boulevard when the Area A basin is developed.

22. Extend Falmouth Avenue as a four-lane secondary highway to join Culver and intersect Jefferson Blvd. This extension shall be elevated on pilings to insure maximum movement of water and organisms (including mammals and avian species) and clearance to permit periodic maintenance to remove debris, silt, etc., while maintaining water flow. The specific design standards necessary to meet these objectives will be set forth in the Local Implementation Plan.

23. At the Culver-Lincoln Blvd. interchange, Culver will be lowered to an at-grade level with Lincoln bridged over it; and, the following ramps shall be provided:

    a. A loop ramp in the southeast quadrant accommodating eastbound Culver Blvd.-to-nortnbound Lincoln Blvd. flow.

    b. A straight ramp in the southeast quadrant accommodating northbound Lincoln-to-eastbound Culver Blvd. flow.

    c. A loop ramp in the northwest quadrant accommodating westbound Culver-to-southbound Lincoln Blvd. flow.

    d. A straight ramp in the northwest quadrant accommodating southbound Lincoln-to-westbound Culver Blvd. flow.

24. Widen Lincoln Blvd. to provide an eight-lane facility between Hughes Way and Route 90.

25. Jefferson Blvd. will be developed as a basic six-lane facility, with an additional eastbound lane between Lincoln Blvd. and Centinela Ave.

26. Reserve right-of-way for a transit way linkage in the Lincoln Blvd. corridor.

27. Extend the Marina Freeway just west of Culver Blvd. with a grade separated interchange at their intersection.

28. Extend Bay St. north of Ballona Channel as a basic four-lane facility constructing a bridge across the channel.

29. During at least the evening peak hours, on-street parking will be prohibited on the south side of Jefferson Blvd. east of Centinela to Mesmer Ave. to provide a third eastbound travel lane.

certified
MDR/Ballona
LUP

EXHIBIT NO. 25
APPLICATION NO.
5-01 432

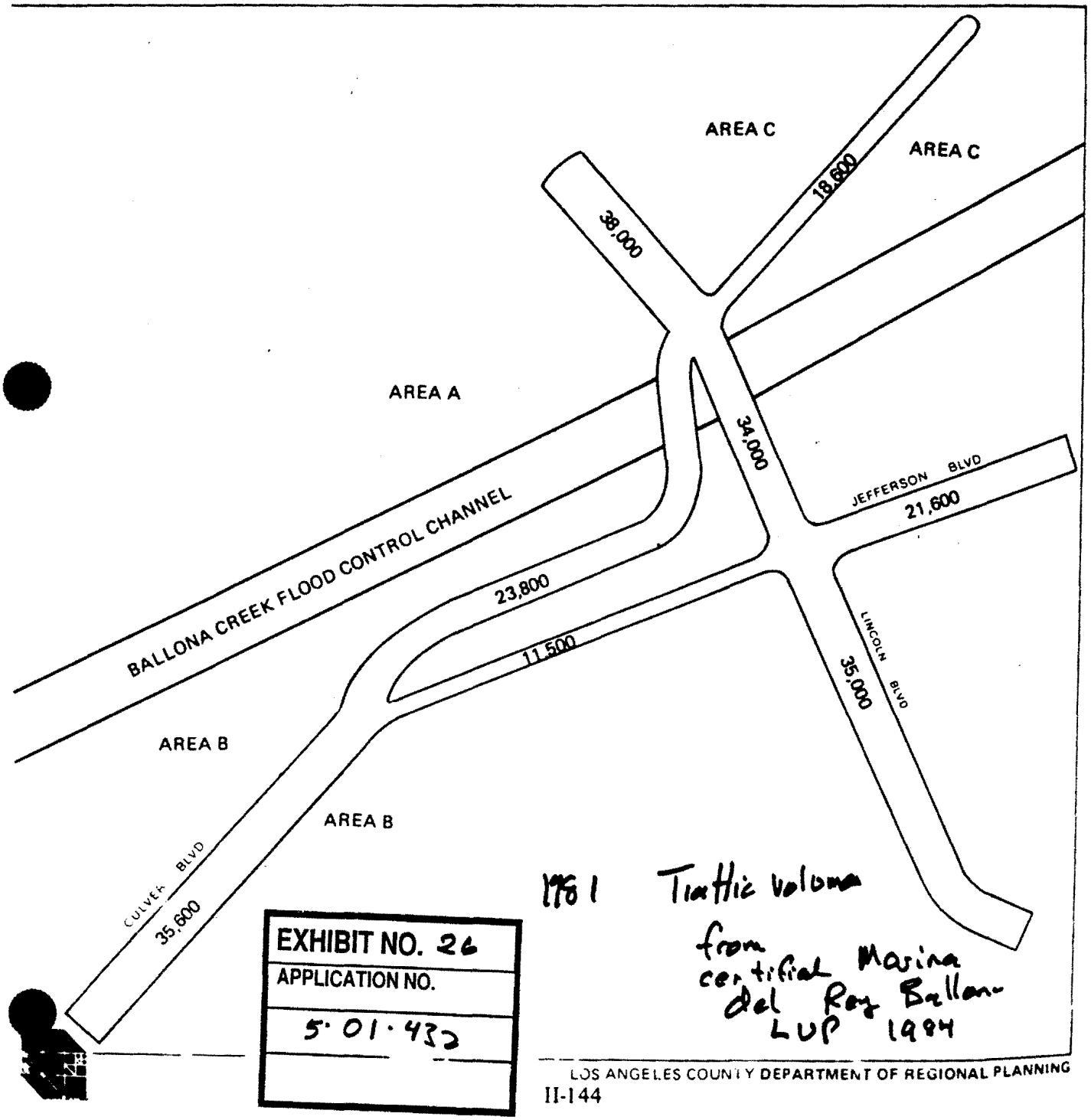
Map 35

1981 TRAFFIC VOLUMES* – AREAS A, B & C

NOTE:
Volumes for Jefferson Blvd. & Culver Blvd. represent total volume on selected weekend days (Source: L.A. County Road Dept. - Traffic Volumes 1981)
Volumes for Lincoln Blvd. represent total annual volume divided by 365 days (Source: Caltrans - 1981 Traffic on California State Highways)

30,000
20,000
10,000
Traffic Volume Scale

N *Estimated Volumes



1981 Traffic Volume from certified Marina del Rey Ballona LUP 1984

EXHIBIT NO. 26
APPLICATION NO.
5-01-432

map 36

Exh. b.t 27

*Potential Park and Ride/ Shuttle Connection Lots

CIRCULATION IMPROVEMENT PLAN

Traffic Improvements certified w/ M.D.R. Ballona LUP

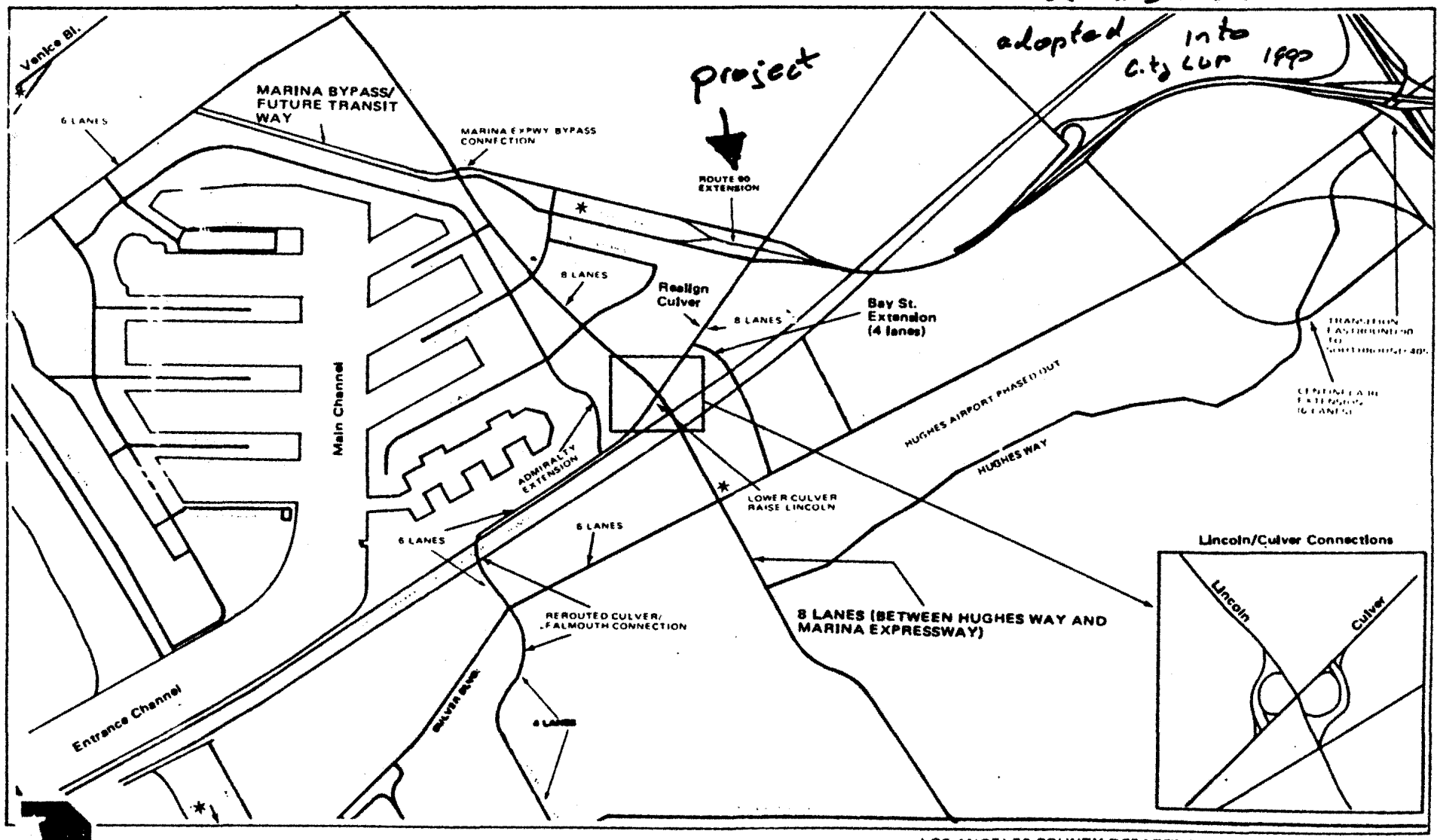


Exhibit 28
5-01-432 EMT District revised EIR Playa Vista

V. PROJECT TRANSPORTATION IMPACTS

Traffic discussion p1

INTERSECTION LEVEL OF SERVICE

Capacity calculations have been performed at the thirteen study intersections to determine the traffic impacts of project traffic resulting from the proposed tract modification and to compare those impacts to the previously approved VTTM 49104. Three sets of calculations are shown. The first set repeats the "Future Background Traffic Without Project" conditions as discussed earlier in this report. The second includes the previously approved Playa Vista Phase 1 development (i.e., with the approved land uses for Subphase 1F). The third set of calculations replaces the previously approved Subphase 1F land uses with the EMT District uses proposed for the modification of Subphase 1F.

The capacity calculation results are shown in Table 8 which indicate that, prior to mitigation, the land uses which comprise the previously approved VTTM 49104 have a significant impact on all thirteen study intersections in both the morning and afternoon peak hour. The third analysis shows that the proposed EMT uses associated with the tract modification would significantly impact twelve of the thirteen intersections in the morning peak hour and twelve of the thirteen intersections in the afternoon peak hour.

Chapter VI of this report discusses the traffic mitigation measures required in the Phase 1 EIR for VTTM 49104 and calculates the intersection level of service effect of these mitigations on both the previously approved VTTM 49104 and the proposed tract modification.

BICYCLES AND PEDESTRIANS

There is no change to the overall bicycle and pedestrian impacts as a result of the proposed tract modification. A continuous bicycle lane will be provided within the EMT District and this

Exhibit 28
P 2 EMT Traffic

TABLE 8
TRAFFIC IMPACT ANALYSES RESULTS
LEVEL OF SERVICE COMPARISONS

SCENARIO A - FUTURE BACKGROUND TRAFFIC (WITH REVISED RELATED PROJECTS)

INTERSECTION	AM PK HOUR V/C	AM PK HOUR LOS	PM PK HOUR V/C	PM PK HOUR LOS
Marina Fwy EB & Culver	1.469	F	1.201	F
Marina Fwy WB & Culver	0.989	E	1.308	F
Lincoln Bl & Jeferson Bl	1.211	F	1.228	F
Lincoln Bl & Teale St	1.034	F	1.072	F
Centinela & Marina Fwy EB	0.682	B	0.681	B
Centinela & Marina Fwy WB	0.989	E	0.901	E
Centinela & Jefferson	1.044	F	0.967	E
Inglewood & Jefferson	0.924	E	0.879	D
Teale St & Centinela	0.641	B	0.764	C
Mesmer & Jefferson	0.523	A	0.602	B
Sepulveda & Centinela	1.456	F	1.332	F
I-405 NB Ramps & Jefferson	0.856	D	0.977	E
I-405 SB Ramps & Jefferson	0.751	C	0.769	C

SCENARIO Ba - FUTURE BACKGROUND PLUS PHASE I APPROVED PROJECT TRAFFIC

INTERSECTION	AM PK HOUR V/C	AM PK HOUR LOS	PM PK HOUR V/C	PM PK HOUR LOS	DELTA AM	DELTA PM
Marina Fwy EB & Culver	1.509	F	1.217	F	0.040	0.016
Marina Fwy WB & Culver	1.002	F	1.361	F	0.013	0.053
Lincoln Bl & Jeferson Bl	1.402	F	1.383	F	0.191	0.155
Lincoln Bl & Teale St	1.168	F	1.179	F	0.134	0.107
Centinela & Marina Fwy EB	0.821	D	0.871	D	0.139	0.190
Centinela & Marina Fwy WB	1.263	F	0.961	E	0.274	0.060
Centinela & Jefferson	1.754	F	1.482	F	0.710	0.515
Inglewood & Jefferson	1.248	F	1.143	F	0.324	0.264
Teale St & Centinela	0.974	E	1.048	F	0.333	0.284
Mesmer & Jefferson	0.796	C	0.763	C	0.273	0.161
Sepulveda & Centinela	1.678	F	1.417	F	0.222	0.085
I-405 NB Ramps & Jefferson	1.158	F	1.333	F	0.302	0.356
I-405 SB Ramps & Jefferson	0.913	E	1.065	F	0.162	0.296

SCENARIO Bp - FUTURE BACKGROUND PLUS PHASE I TRAFFIC WITH PROPOSED 1F EMT USE

INTERSECTION	AM PK HOUR V/C	AM PK HOUR LOS	PM PK HOUR V/C	PM PK HOUR LOS	DELTA AM	DELTA PM
Marina Fwy EB & Culver	1.491	F	1.209	F	0.022	0.008
Marina Fwy WB & Culver	0.994	E	1.335	F	0.005	0.027
Lincoln Bl & Jeferson Bl	1.385	F	1.361	F	0.174	0.133
Lincoln Bl & Teale St	1.182	F	1.168	F	0.148	0.096
Centinela & Marina Fwy EB	0.761	C	0.789	C	0.079	0.108
Centinela & Marina Fwy WB	1.195	F	0.923	E	0.206	0.022
Centinela & Jefferson	1.433	F	1.391	F	0.389	0.424
Inglewood & Jefferson	1.278	F	1.169	F	0.354	0.290
Teale St & Centinela	0.806	D	0.918	E	0.165	0.154
Mesmer & Jefferson	0.758	C	0.781	C	0.235	0.179
Sepulveda & Centinela	1.609	F	1.389	F	0.153	0.057
I-405 NB Ramps & Jefferson	1.151	F	1.288	F	0.295	0.311
I-405 SB Ramps & Jefferson	0.857	D	1.018	F	0.106	0.249

Table 6-2(b) Revised 8/7/95 to Reflect Playa Vista Studios

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

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 sq.ft. community serving	• 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 sq.ft. community serving	• 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

ph. 1 mitigation
playa vista
5-01-432

Table 6-2(b)

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

Subphase	Location	Program	Intersection/Street Improvements
1C	West end of Area D, north and south of Jefferson Boulevard	800 du 5,000 nsf retail 10,000 nsf office	• 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
1D	West end of Area D, north and south of Jefferson Boulevard	846 du 20,000 nsf office 25,000 sq.ft. community serving	• 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) • Centinela/Marina Freeway eastbound • Centinela/Marina Freeway westbound • Jefferson/I-40 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

P Vista phase I Mitigation

Table 6-2(b)

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

Subphase	Location	Program	Intersection/Street Improvements
1E	West end of Area D, north of Jefferson Boulevard	350,000 nsf office 5,000 nsf of retail pplat	• 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 • Centinela/Jefferson (complete intersection improvements)

Exhibit 29 p 4
Playa Vista ph. 1 mitigation

Table 6-2(b)

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

Subphase	Location	Program	Intersection/Street Improvements
1F	East end of Area D	1,370,000 gsf of studio and studio-related office →	• Option B improvements to Centinela Avenue between the Marina Freeway and Juniette Street • Complete construction of "E" Street from 9th Street to Centinela 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 and Mesmer Avenue • Widen Jefferson between Centinela 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 1,000,000 gr. sq.ft. 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 •

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.*

9.01.432

VI. MITIGATION

Exhibit 30
p.1 Playa Vista
EMT amendment
Mitigation

The tract modification, if approved, will still require the implementation of every mitigation measure that was required for the Phase 1 VTTM 49104 development. However, because Subphase 1F (the EMT District) may be developed as the second implementation phase of the Phase 1 development rather than the sixth step, the implementation phasing for mitigation measures will change. This chapter describes those phasing changes. It then compares the effectiveness of the mitigation program to mitigate the traffic impacts of the previously approved VTTM 49104 as compared to the proposed tract modification.

MITIGATION IMPLEMENTATION PHASING

Because Subphase 1F of the Phase 1 Playa Vista development may come as the second implementation step rather than the sixth, some changes to the approved Phase 1 Mitigation Program must be made. This is necessary because, for example, Subphase 1F called for the widening of Jefferson Boulevard east of the intersection of Jefferson/Centinela. However, this improvement only "fit" because an earlier phase had called for the improvement of the intersection of Jefferson/Centinela. Therefore, to fit the pieces of the overall Mitigation Program together, some phasing changes must be made in the Phase 1 Mitigation Program.

Table 9 shows the proposed changes to the Playa Vista Phase 1 Mitigation Program. In almost all cases, the implementation of project mitigation has been accelerated.

The wording on the condition for the Marina Freeway/Culver Overpass has been revised to limit the total amount of commercial and/or residential development that could be constructed in Phase 1 prior to bridge opening. This new wording takes into account the early implementation of Subphase 1F and limits Phase 1 development to approximately the same generation of total trips as the previous implementation schedule prior to bridge opening.

Filed 4/16/99

CERTIFIED FOR PUBLICATION

COURT OF APPEAL, FOURTH APPELLATE DISTRICT

DIVISION ONE

STATE OF CALIFORNIA

BOLSA CHICA LAND TRUST et al., Petitioners, v. THE SUPERIOR COURT OF SAN DIEGO COUNTY, Respondent;	D029461, D030270 (San Diego County Super. Ct. No. 703570)
BOLSA CHICA LAND TRUST et al., Real Parties in Interest.	

Petitions for writs of mandamus, Judith D. McConnell, Judge. Petitions granted and denied.

Nossaman, Guthner, Knox & Elliott, Alvin S. Kaufer, John J. Flynn III and William M. Boyd for Petitioners and Real Parties in Interest Koll Real Estate Group and Signal Bolsa Corporation.

Paul Horgan, Philip A. Seymour and Deborah A. Cook for Petitioners and Real Parties in Interest Bolsa Chica Land Trust, Huntington Beach Tomorrow, Shosone-Gabrielino Nation, Sierra Club and Surfrider Foundatic..

5-01-132
S...
Excerpts from Balsa Chica
p. 2
Exhibit 32
p2

restrictive policy of section 30240, in the absence of the limitation set forth in section 30233, subdivision (a), case by case balancing of interests under section 30007.5 would be repeatedly required.

Although we accept Commission's interpretation of sections 30233 and 30240, we do not accept Commission's application of that interpretation to Warner Avenue Pond. In particular we note that under Commission's interpretation, incidental public services are limited to temporary disruptions and do not usually include permanent roadway expansions. Roadway expansions are permitted only when no other alternative exists and the expansion is necessary to maintain existing traffic capacity. As the trust points out, Commission found that the widening of Warner Avenue was needed to accommodate future traffic created by local and regional development in the area. Contrary to Koll's argument, this limited exception cannot be extended by finding that a roadway expansion is permissible when, although it increases the vehicle capacity of a roadway, it is designed to maintain an existing level of traffic service. Such an interpretation of the exception would entirely consume the limitation Commission has put on the incidental public services otherwise permitted by section 30233, subdivision (a)(2).

In sum then, like the trial court we find that the LCP is defective insofar as it approves the filling of Warner Avenue Pond.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 620-3550
(213) 897-0362

September 10, 1993

Mr. Con Howe
City of Los Angeles
Planning Department
City Hall - Room 561
200 North Spring Street
Los Angeles, CA 90012

Post-it™ brand fax transmittal memo 7671 | # of pages ▸

To Doug Gardner	From Frank Eberhard
Co. McGuire Thomas	Co. City Planning
Dept.	Phone # 213 237 1986
Fax # 310 827 1073	Fax #

Dear Mr. Howe:

This letter is to notify the City of Los Angeles Planning Department, Planning Commission, and the Planning and Land Use Management Committee (P.L.U.M.) of Caltrans' present position concerning the appeal of the Playa Vista Phase I Development and Tentative Tract Map No. 49104.

As of September 1, 1993, Caltrans staff has met with McGuire Thomas Partnership (M.T.P.) and the City of Los Angeles Department of Transportation to review new plans that reflected the mitigation agreed upon in our meeting with M.T.P. Senior Partner Nelson Rising and staff on August 19th.

We have all agreed to the Route 90/Culver Boulevard interchange concept with minor modifications to Culver Boulevard and with the condition that the Route 90 bridge over Culver Boulevard will span the ultimate master plan width of Culver Boulevard (approximately 122'). This plan included restriping the Route 90 bridge over Baloona Creek to 6 lanes.

Also, the M.T.P. Plan to signal control the Culver Boulevard loop ramp to northbound Lincoln and provide three lanes both northbound and southbound on Lincoln Boulevard was unanimously agreed upon.

The present environmental document ties the completion of Culver Boulevard/Route 90 partial interchange to the completion of Playa Vista Phase I. We have agreed to support this timing for the revised (agreed upon) Route 90/Culver Boulevard interchange.

Based upon these discussions, it has been concluded that Caltrans' concerns have been adequately met. Contingent upon the City of Los Angeles agreement to the terms discussed in these meetings, it is Caltrans intent to rescind its appeal of the Playa Vista Phase I Project.

Sincerely,

JERRY J. BAXTER
District Director

cc: Hal Bernson
Councilman

Nelson Rising
MTP

EXHIBIT NO. 32
APPLICATION NO.
5-01-452
Caltrans Comments

State of California — Business, Transportation and Housing Agency

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 : DEPARTMENT OF TRANSPORTATION
Robert Goodell - District 7

RECEIVED
MAR 24 1993
JOEL STENSBY

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. 33 p.1
APPLICATION NO.
5-01-452
Goodell Letter

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 lanes 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".

5.01.432
Exhibit 33p3

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-wa 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 shoul 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 ficifoli etc.

5-01-432
Exhibit 23 p 4

Modifications of Route 90 have the potential for adverse impacts or 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 Boulev 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 #: 12, 21, and 23 in the vicinity of Lincoln Boulevard and locations 18 and 19 in the vicinity of Centinela Avenue and the Marina Freew were reviewed (see Vol. XI, Fig. 7, Noise Monitor Locations).

a) Location #18, east of Centinela Avenue and Sepulveda intersect near Riggs Place has been predicted at a noise level of 69.4 d (Leq). Although no single family residences are affected in t immediate vicinity, the Pacifica Hotel may have 1st floor res who may be impacted by increased future peak noise levels.

b) Location #21, north of Jefferson Blvd. and east of Allard (in D) has a internal noise level predicted at 68.8 dBA (Leq). Th site receptor is far removed from Lincoln Boulevard to the wes

c) There is no information in the Noise Impact Study for Area 'C' (residential) vis-a-vis future noise level for the Marina Free (Rte. 90).

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

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

Any transport of heavy construction equipment which requires the u 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.

5-01-432
Exh. No. 33
P5

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

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

Sub-element	Location	PSR	ITIGATION MEASURES
		Proposed Described in EIR	Caltrans' Proposals
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 Rte 1 to E/B Culver connection. Reconstruct E/B Culver to N/B Rte 1 connection.
1B	■ Lincoln Bl.-Fiji Way/Rte. 90	Widen N/B to 4 lanes by removing traffic islands	Keep exist. traffic islands. Provide 4 lanes in each dir. by widening in Ph. II.
	o *Culver Blvd-Lincoln/Bay St* *Culver Blvd-Bay St/90 Fwy*	*Deferred until Master Plan mitigation*	Widen to 4 lanes. Widen to 6 lanes + left & right turn lanes
1B	■ Lincoln Bl-Jefferson/ Ballona Cr.	Widen N/B to 4 Lanes and S/B to 3 lanes	Provide 4 lanes in each direction
1B	■ Lincoln Bl- Ballona Cr./Fiji Wy	Widen N/B to 3 lanes	Provide 4 lanes in each direction
1C	■ Lincoln Bl- La Tijera/Hughes Terr.	Widen N/B to 4 lanes by removing traffic islands.	Ph. I: Use 60/40 sig. time split, provide more S/B lt. turn storage at Manchester. Ph. II: Widen to provide 4 lanes in each direction.
1D	■ E/B 90 On-ramp from Centinela	Widen ramp entrance to 30'.	Widen to 3 lanes and install ramp metering with HOV By-Pass Lane
1D	■ W/B 90 Off-ramp to Centinela	Minor widening to permit 2 lanes to go to 3 lanes at the intersection.	DEIR Proposal okay
1D	■ Lincoln Bl at Jefferson Blvd.	None Proposed	Provide additional intersection capacity Phase I -Grade sep. Phase II or cul-de-sac Jefferson at Culver.
1D	■ N/B 405 On-ramp from Jefferson	Construct loop ramp for E/B Jefferson On-ramp to N/B 405-close or reroute N/B Off-ramp- Minor road work and restriping on W/B Jefferson to provide longer left turn pocket.	DEIR proposal uses many substandard features which need justification. Caltrans believes most project traffic can be directed to 90 Fwy.
1D	■ S/B 405 On-ramp from Jefferson	Widen E/B Jefferson for right turn pocket to S/B On-ramp widen ramp entrance to 3 lanes	DEIR Proposal should be augmented with HOV By-pass lane
1D	■ 90 Connectors to N/B 405	None Proposed	Install connector metering and construct collector road for both the E/B and W/B 90 Connectors.
	o *Centinela at Jefferson*	*None Proposed*	*Provide additional intersection capacity Ph. I - Grade sep. Ph. II*
1E	■ 90 Fwy at Culver Blvd	Widen N/B Culver at E/B 90 On-ramp to provide a 2-lane right turn pocket and widen ramps at Culver to provide an additional lane Restripe W/B 90 Expwy for about 600' to provide 3 lanes.	Continue 90 Fwy over Culver by constructing grade sep. diamond interchange & provide a three lane W/B off-ramp and a two lane S/B on-ramp with HOV by-pass
1E	■ 90 Freeway		Extend full freeway section from east of Ballona Creek across Culver Blvd.
1E	■ 90 Expwy at Mindanao	Widen E/B and W/B 90 Expwy to provide additional thru and turning lanes (work to be done by the Channel Gateway Project).	Widen S/B Mindanao to provide 3 thru lanes and a 2-lane left turn pocket full width. Widen N/B Mindanao to provide 2 thru lanes and a left turn pocket.
1E	■ S/B 405 Connector to W/B 90	None Proposed	Widen Connector to 2 lanes
	o *Bay St at Culver Blvd.*	*Deferred until Master Plan Mitigation*	Construct double left from W/B Culver to Bay St.
	o *Bay St.*	*Deferred until Master Plan Mitigation*	Construct 4 lanes from Culver Blvd. to Toale St.

■ City Street Impacting State Highway

5.01.432
Exh. b, 33
p1

5-01-432
Exhibit 34
pg 1

Kaku Associates, Inc.

DRAFT
ROUTE 90/CULVER
RESPONSES TO COASTAL COMMISSION STAFF REPORT
TRAFFIC-RELATED ISSUES

Route 90/Culver Staff Report Comment 1

Present levels of service have acutely improved over 1990 levels of service reported by the Playa Vista Consultant, Kaku Associates, even without changes to the intersection.

Response to Comment 1

It is not true that there have not been changes to the intersection. Review of the 1990 LOS calculations versus more recent calculations indicates the following changes:

- Striping modification on EB Culver approach to EB 90 on-ramp.
- Implementation of City of Los Angeles' ATSAC signal control system (resulting in 7% capacity increase).
- Also, although not a physical or operational change in the field, the more recent calculations utilize the LOS CMA methodology as refined and utilized by LADOT.

LOS actually worsened in the PM peak hour from the 1990 conditions reported in the Playa Vista First Phase EIR to the 1998 conditions reported in Route 90/Culver Project Report, even with the intersection changes noted above (see Table 1). In the AM peak hour, the reported LOS improved. The AM peak hour improvement was due to a combination of the changes at the intersection noted above and a reduced traffic count.

More recent counts conducted in 2001 indicate that poor levels of service of E and F are continuing, during both the PM peak hour and during the Sunday afternoon peak hour of coastal recreational traffic (see Table 1). The end result is that the Route 90/Culver intersections were and are near and over capacity during peak periods in 1990, 1998, and 2001.

For clarification, the traffic analysis in the Playa Vista First Phase EIR (including the 1990 LOS and 1997 projections) were prepared by Barton-Aschman Associates, not Kaku Associates.

Route 90/Culver Staff Report Comment 2

The staff report notes that the Playa Vista First Phase EIR estimates that traffic would increase by 4% per year from 1990 to 1997, including ambient growth and related projects, and yet the levels of service have actually improved since 1990.

Response to Comment 2

See response to comment 1 re changes in reported LOS since 1990.

Regarding why the level of growth projected in the Playa Vista First Phase EIR did not materialize by the time the more recent (1998) calculations were done, the most likely reason is

5-01-432
Exhibit 34 p.

the recession of the mid-1990s. The Playa Vista First Phase EIR was prepared during a time (late 1980s, early 1990s) when development growth had been rampant and was expected to remain so, and this expectation is likely reflected in the projected traffic growth rates utilized in the First Phase EIR.

However, development essentially came to a halt for many years during the recession. Experience in many areas of Los Angeles indicate that traffic volumes remained relatively constant during the 1990s, and in some cases even declined. Subsequent to that time, development activity and traffic levels have begun increasing.

Route 90/Culver Staff Report Comment 3

No information has been provided regarding traffic re-routing or change in mode alternatives.

Response to Comment 3

Modal alternatives were evaluated and determined to not provide sufficient modal shift to obviate the need for the proposed Project. Rather, both transit improvements and the proposed Project in combination (not one as an alternative to the other) were found to be needed to accommodate approved development. For this reason, the Lincoln Boulevard Corridor Transit Enhancement Project is a part of the Playa Vista mitigation program.

Additional system-level alternatives to the Project were evaluated during project development that involved improvements to existing parallel streets and/or freeways. No other opportunities were found to develop a new east-west route within the study area because of right of way, land use, and topographical constraints.

The alternative routes investigated for widening included Jefferson Boulevard, Washington Boulevard, and Venice Boulevard. Jefferson Boulevard will be widened from Route 1 to Centinela Avenue as part of the Playa Vista mitigation program. In addition, the Playa Vista mitigation program includes improvements at key intersections along the Jefferson Boulevard corridor. However, capacity constraints at the Jefferson Boulevard/I-405 interchange limits the effectiveness of these improvements when it comes to connecting Jefferson Boulevard to the regional freeway system. Major widenings along Washington Boulevard and along Venice Boulevard were determined to be infeasible due to residential and commercial land use impacts.

Interstate 10 (Santa Monica Freeway) has been studied for the addition of high-occupancy vehicle (HOV) lanes. Further widenings to add mixed-flow lanes appears infeasible due to right of way impacts and costs. Computer model simulations of a widened I-10 indicated that the widened facility would not divert enough trips away from the central portion of the study area to relieve congestion in the Route 90 corridor.

In summary, when compared to the proposed Project, each of the project traffic alternatives would have greater right of way impacts on residential and commercial uses while providing less congestion relief.

12/19/01

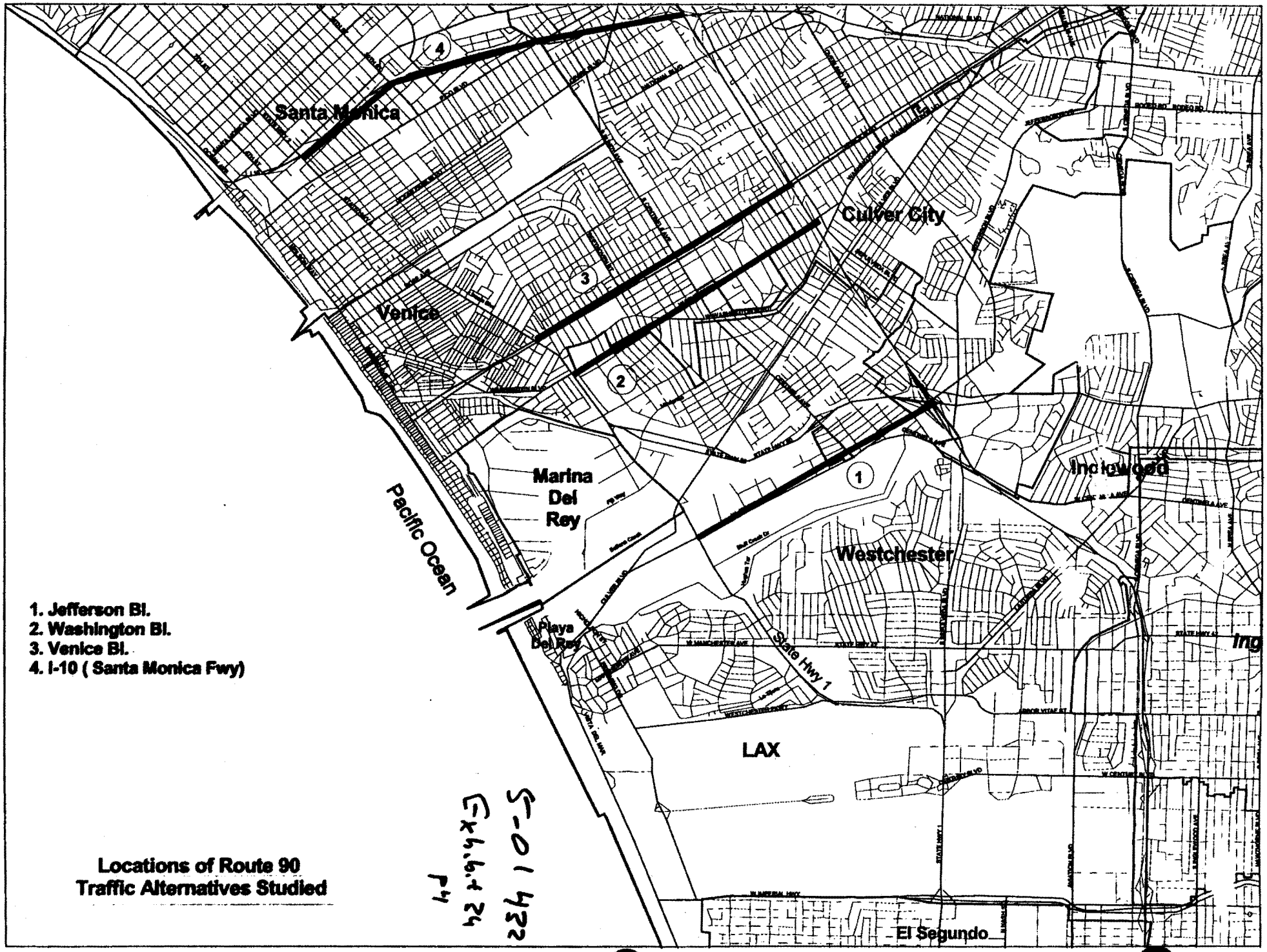
TABLE 1
EXISTING INTERSECTION LEVEL OF SERVICE COMPARISON
CULVER/90 RAMP INTERSECTIONS

Intersection	Peak Hour	1990 Conditions (from 1992 PV 1st Phase EIR) [a]		1998 Conditions (from 2000 Project Report) [b]		2001 Conditions (based on new counts) [b]	
		V/C	LOS	V/C	LOS	V/C	LOS
Route 90 EB Ramps & Culver Bl.	Weekday AM	1.323	F	0.90	D	0.70	C
	Weekday PM	0.943	E	0.95	E	0.95	E
	Saturday PM	*n/a*		*n/a*		0.80	D
	Sunday PM	*n/a*		*n/a*		0.77	C
Route 90 WB Ramps & Culver Bl.	Weekday AM	0.834	D	0.79	C	0.90	D
	Weekday PM	1.036	F	1.13	F	1.01	F
	Saturday PM	*n/a*		*n/a*		0.77	C
	Sunday PM	*n/a*		*n/a*		0.93	E

Notes:

a. Before lane reconfiguration on EB Culver approach to EB on-ramp and implementation of ATSAC.
b. 1998 and 2001 conditions incorporate lane reconfiguration at Culver/EB ramps and credit for ATSAC.
c. For illustrative purposes.

S.01 4/32
Exhibit 3.1
p 2



Locations of Route 90
Traffic Alternatives Studied

S-01 424
Exhibit 24
p4