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1 WHEREAS, based on the Initial Study, a Mitigated Negative Declaration
2 was prepared, finding that the Project, as mitigated, will not result in significant adverse
3 environmental impacts; and

4 WHEREAS, on November 14, 2016, the City Council held a duly noticed
5 public meeting on the proposed plans and specifications for the Project, fully considering
6 the related staff report, environmental information and all public comments presented.

7
8 NOW, THEREFORE, the City Council of the City of Culver City DOES
9 HEREBY RESOLVE as follows:

10 Pursuant to the foregoing recitations, and in accordance with the California
11 Environmental Quality Act (CEQA), the City Council hereby adopts a Mitigated Negative
12 Declaration (attached hereto as Exhibit A and incorporated herein by this reference),
13 finding the Project, as mitigated, will not result in significant adverse environmental
14 impacts.
15

16
17 APPROVED and ADOPTED this _____ day of _____, 2016.
18
19

20 _____
21 JIM B. CLARKE, Mayor
22 City of Culver City, California

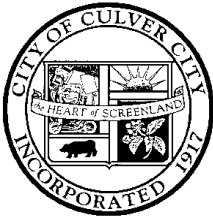
23 ATTEST:

APPROVED AS TO FORM:

24 _____
25 JEREMY GREEN, Deputy City Clerk

26 
27 CAROL A. SCHWAB, City Attorney
28 

A16-00982



(310) 253-5710

FAX (310) 253-5721

PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	P-553, Higuera Street Bridge over Ballona Creek Replacement Project		
Lead Agency Name & Address:	City of Culver City, Public Works/Engineering 9770 Culver Blvd., Culver City, CA 90232		
Contact Person & Phone No.:	Sammy Romo, Project Engineer, City of Culver City (310) 253-5619		
Project Location/Address:	The Higuera Street Bridge over Ballona Creek is located on Higuera Street between Jefferson Boulevard and Eastham Drive in the Cities of Culver City and Los Angeles.		
Nearest Cross Street:	Jefferson Boulevard and Eastham Drive	APN:	4205-026-901 4204-005-002 4205-026-001 4204-005-008 4204-005-003
Project Sponsor's Name & Address:	Attn: Sammy Romo, Project Engineer City of Culver City Public Works Department 9770 Culver Boulevard Culver City, CA 90232-0507		
General Plan Designation:	<i>City of Culver City:</i> Open Space (Ballona Creek) and Industrial	Zoning:	<i>City of Culver City:</i> Open Space (OS) – (Ballona Creek) and Industrial General (IG)
	<i>City of Los Angeles:</i> Open Space and Limited Industrial		<i>City of Los Angeles:</i> Open Space (OS) – (Ballona Creek) and Restricted Industrial (MR1)
Redevelopment Project Area:	Component Area No. 3		
Overlay Zone/Special District:	Culver City Bicycle and Pedestrian Master Plan area, Ballona Creek Focused Special Study area, and Hayden Industrial Tract Focused Special Study area.		

Project Description and Requested Action:

The City of Culver City (City), in cooperation with the California Department of Transportation (Caltrans), proposes to replace and widen the existing Higuera Street Bridge (Bridge) over Ballona Creek (#53C-0876) in Culver City, California (Project). The new Bridge would meet required seismic and geometric standards and enhance safety for bicyclists and pedestrians crossing the Bridge. The Project would also include a new ramp connection from Higuera Street to the existing Ballona Creek Bike Path (Bike Path).

The Higuera Street Bridge traverses east to west over Ballona Creek (Creek), approximately 250 feet east of Eastham Drive in Culver City (see **Figure 1** and **Figure 2**). The Bridge, built in 1938, is a 3-span steel girder structure that is 168 feet long and 41 feet wide. The existing Bridge has sidewalks on both sides; the Bridge does not have bike lanes or shoulders.

Higuera Street is designated in the City's General Plan Circulation Element as a Secondary Artery. Desirable right of way (ROW) widths for Secondary Arteries range between 80-94 feet. Currently, to the east and west of the Project area, there are two lanes in each direction. However, the existing Bridge has one lane in the westbound direction and two lanes in the eastbound direction; therefore, the roadway tapers at the Bridge because of the constrained width of the existing Bridge structure, resulting in a "bottleneck" at the Bridge.

During a Caltrans bridge inspection report (BIR), the Bridge was given a Sufficiency Rating of 72.9. Because the rating was less than 80, the Bridge was determined to be Functionally Obsolete. The structure has also deteriorated, and there are deep cracks in the concrete on the Bridge deck. The bottom reinforcement has rusted, creating substandard conditions. The Bridge was not designed to withstand current vehicle loads, and the existing guardrails do not meet current standards. The need for the Project is based on the following:

- Inadequate curb-to-curb width compared to the roadway approaches;
- Nonstandard Bridge railings and approach transitions;
- Water seepage and rust visible under the Bridge deck;
- No shoulder or median on the Bridge;
- Substantial vibration from traffic on the Bridge;
- Horizontal separation of one to two inches in the west abutment expansion joint;
- Vertical settlement of one inch in the west expansion joint;
- Steel members with riveted connections;
- Lead paint on steel members; and
- No pedestrian or bicycle connection to and from the existing Bike Path.

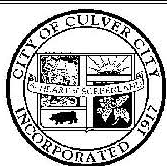
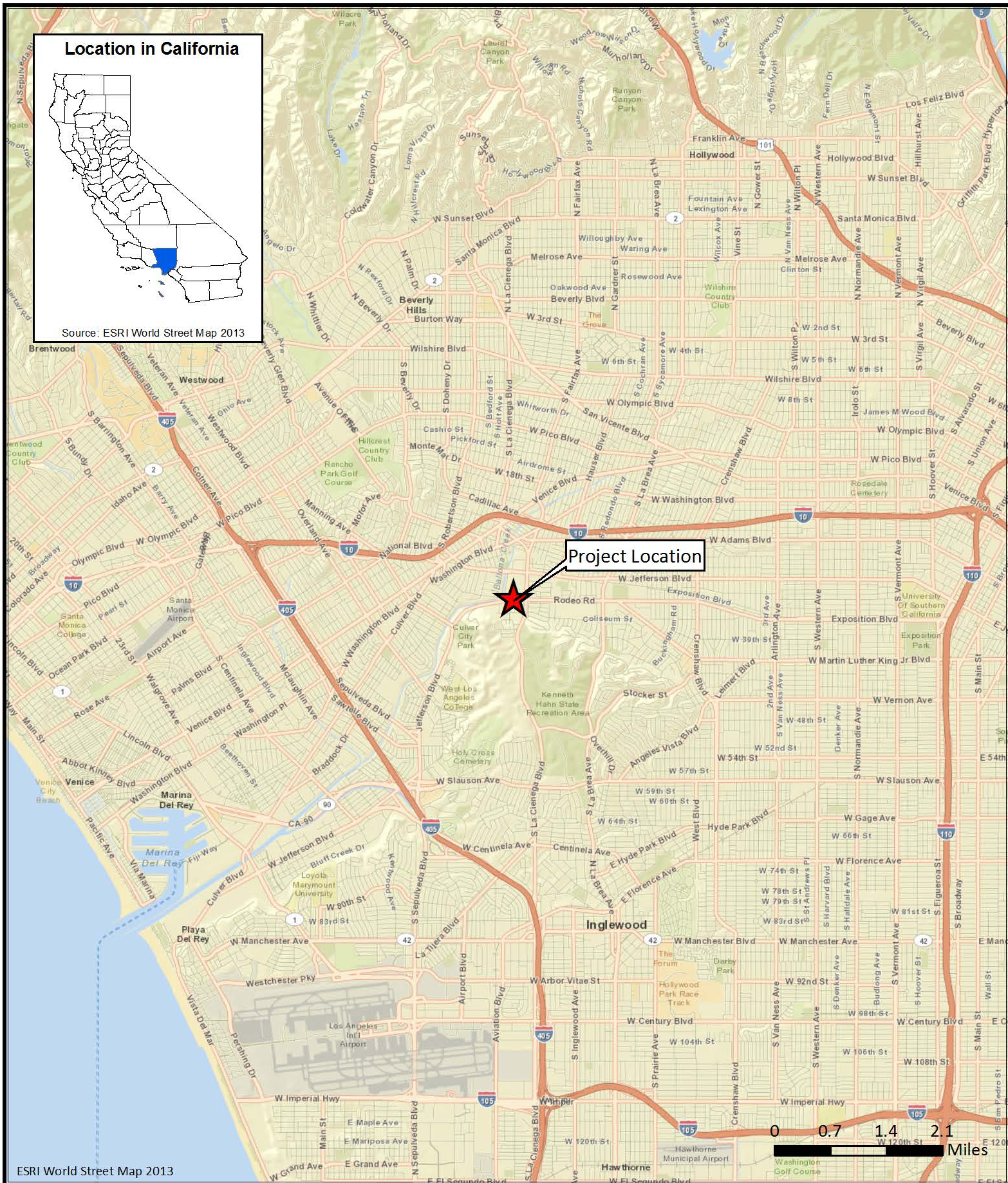


FIGURE 1. REGIONAL LOCATION MAP
Higuera Street Bridge Replacement





FIGURE 2. PROJECT LOCATION MAP
Higuera Street Bridge Replacement



The existing Bridge structure is constructed from continuous steel girders resting on rocker bearings on top of the piers, and is cantilevered with no connection to the abutments. The existing Bridge was seismically retrofitted in 1999; however, the pier foundations were not strengthened, and the improvements do not meet current seismic standards. The existing Bridge piers are resting on timber piles, which do not provide shear resistance (shearing is the distortion of a material substance in which parallel internal surfaces slide past one another) to lateral seismic loads (seismic forces generated by superstructure and the piers), and would have the potential to weaken or fail in the event of a seismic event. Therefore, a Bridge replacement must be completed to meet current safety and seismic standards.

The majority of the Project area is located within the boundaries of Culver City, with a small portion crossing over Culver City's eastern border into the City of Los Angeles (Los Angeles) (see **Figure 3**). The Project area is located in an urban setting and is adjacent to commercial, industrial, and open space land uses. The Creek, a concrete-lined channel that traverses from northeast to southwest, is also in the Project area. The Bike Path runs along the western bank of the Creek and crosses under the Bridge.

The Project would include replacing and widening the existing Bridge from approximately 41 feet to 70 feet (see **Figure 4**). The existing structure would be replaced by a single-span cast-in-place bridge with pre-stressed concrete box girders and 24-inch cast-in-drilled-hole (CIDH) piles positioned between the existing steel piles. The new Bridge would have two 12-foot vehicle lanes, a 5-foot bike lane, and a 6-foot sidewalk in each direction. With implementation of the Project, one vehicle lane would be added to the Bridge to close the existing gap, thus eliminating the bottleneck. The number of through lanes at the adjacent Higuera Street intersections (two lanes in each direction) would remain the same. The Project would also include a new ramp connection from Higuera Street to the Bike Path.

To complete the Project, ROW acquisition of approximately 791 square feet (0.02 acre) of private land adjacent to the Bridge would be required from two parcels to the south of the Bridge (Assessor's Parcel Number [APN] 4205-025-008 and APN 4205-025-003) to complete a bike lane transition path (see **Figure 5**). If ROW acquisition for the bike lane transition path is not feasible, the westbound left-turn lane (which leads into APN 4205-025-008) would be removed to restripe the roadway and accommodate the bike lane transition path. Permanent easements of approximately 5,171 square feet (0.12 acre) of land would be required from three Los Angeles County Flood Control District (LACFCD) parcels adjacent to the Bridge.

The Project would incorporate Bike Option 2, which would include the construction of a crosswalk at the Higuera Street/Eastham Drive intersection. The crosswalk would connect to a bike and pedestrian ramp at the southwest corner of the Bridge that would connect to the existing Bike Path that crosses under the Bridge (see **Figure 6**). The final location of temporary construction easements (TCE) would be determined during final design. During construction, the Bridge would be closed to traffic; however, optional routes to cross the Creek would be available, including National Boulevard and Duquesne Avenue. A traffic management plan (TMP) identifying detour routes would be developed during final design.

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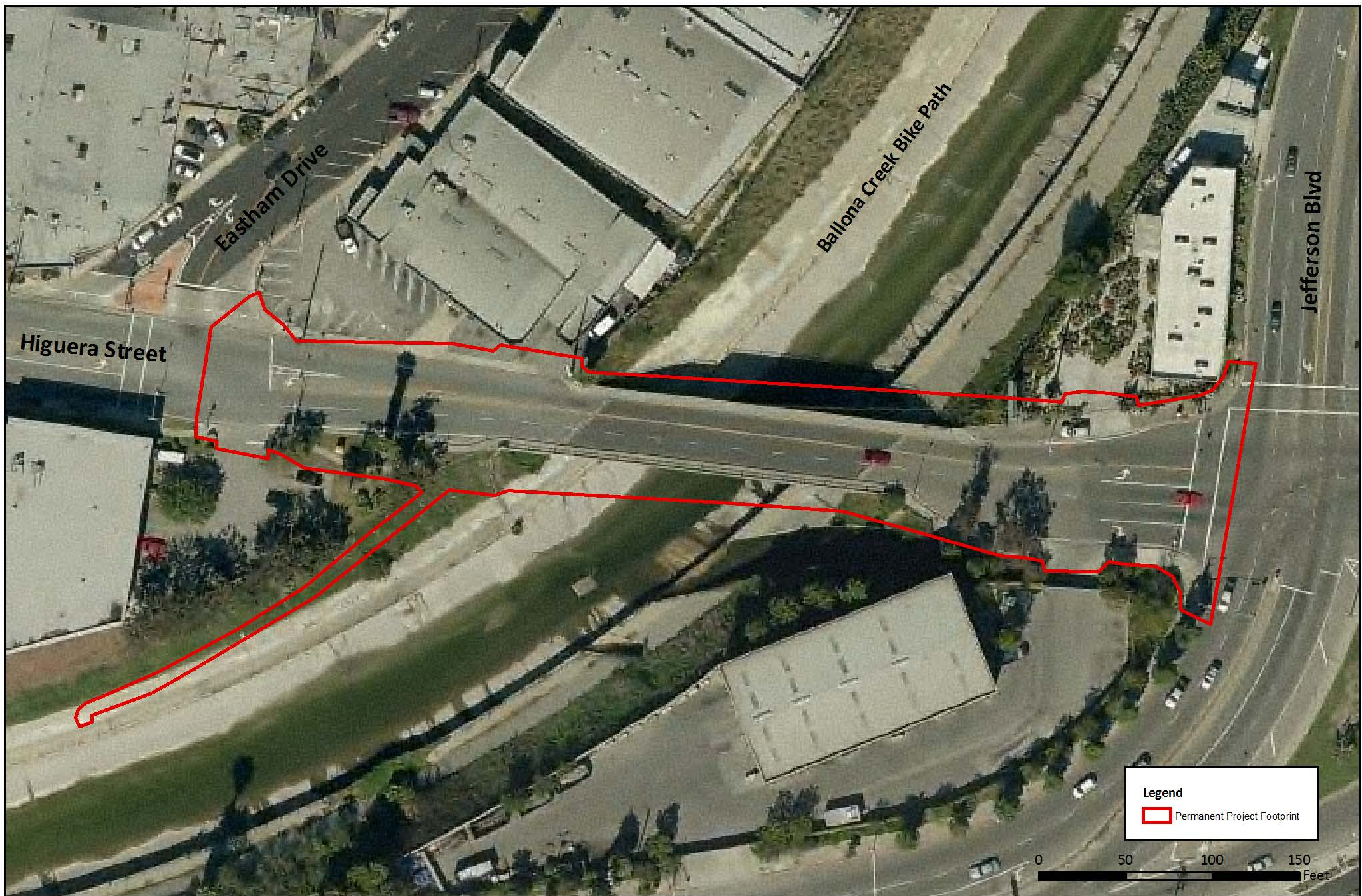
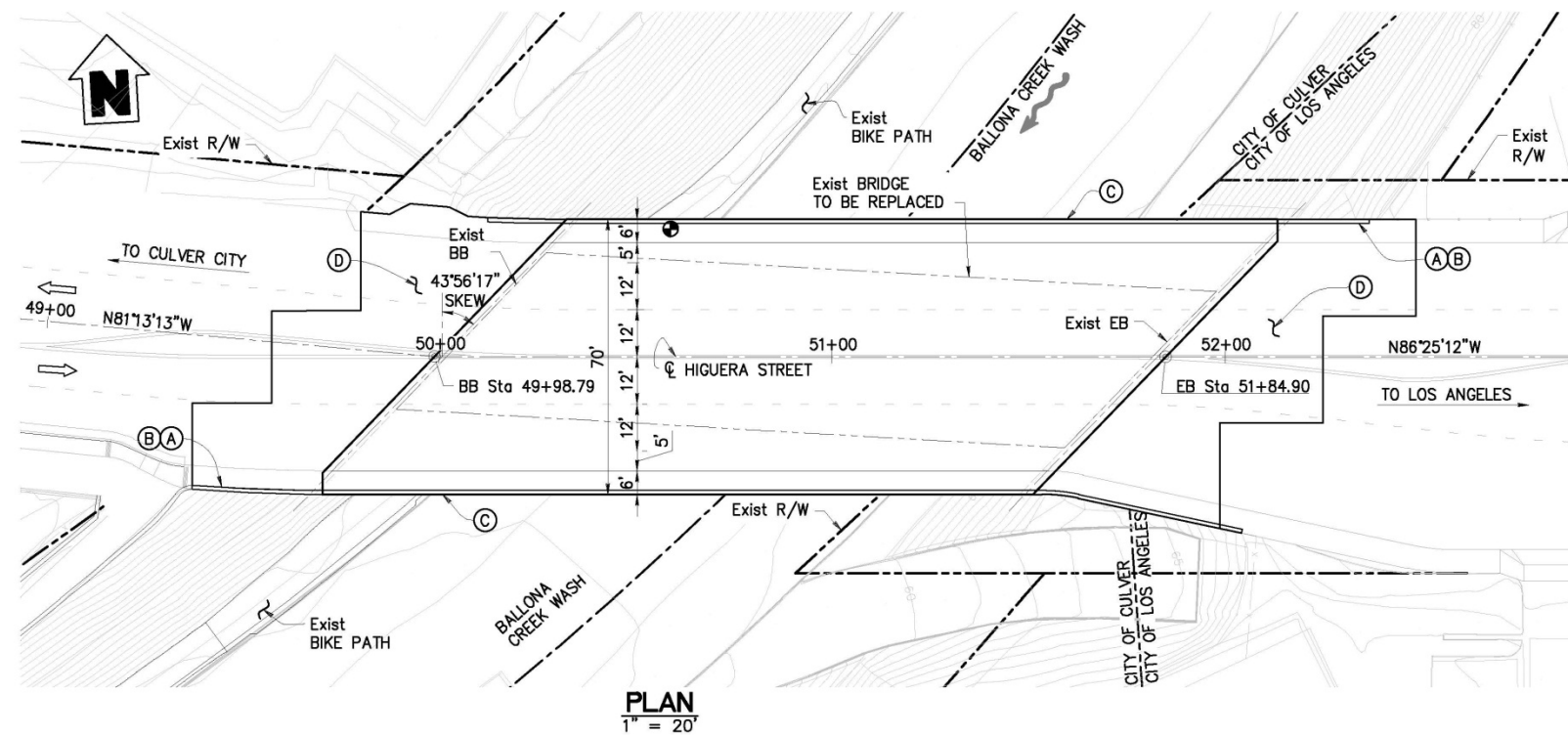
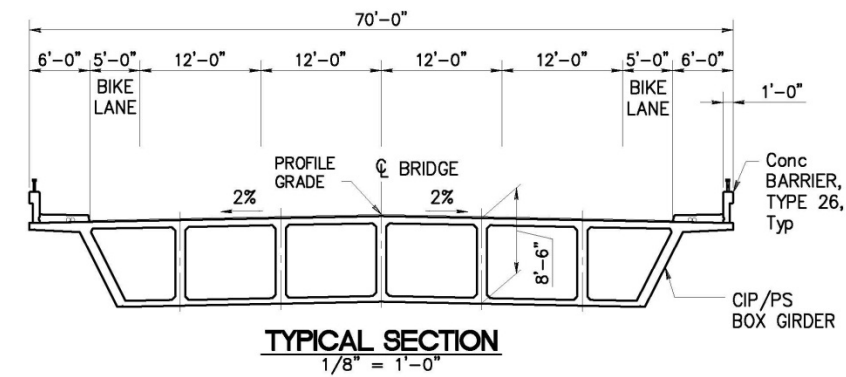
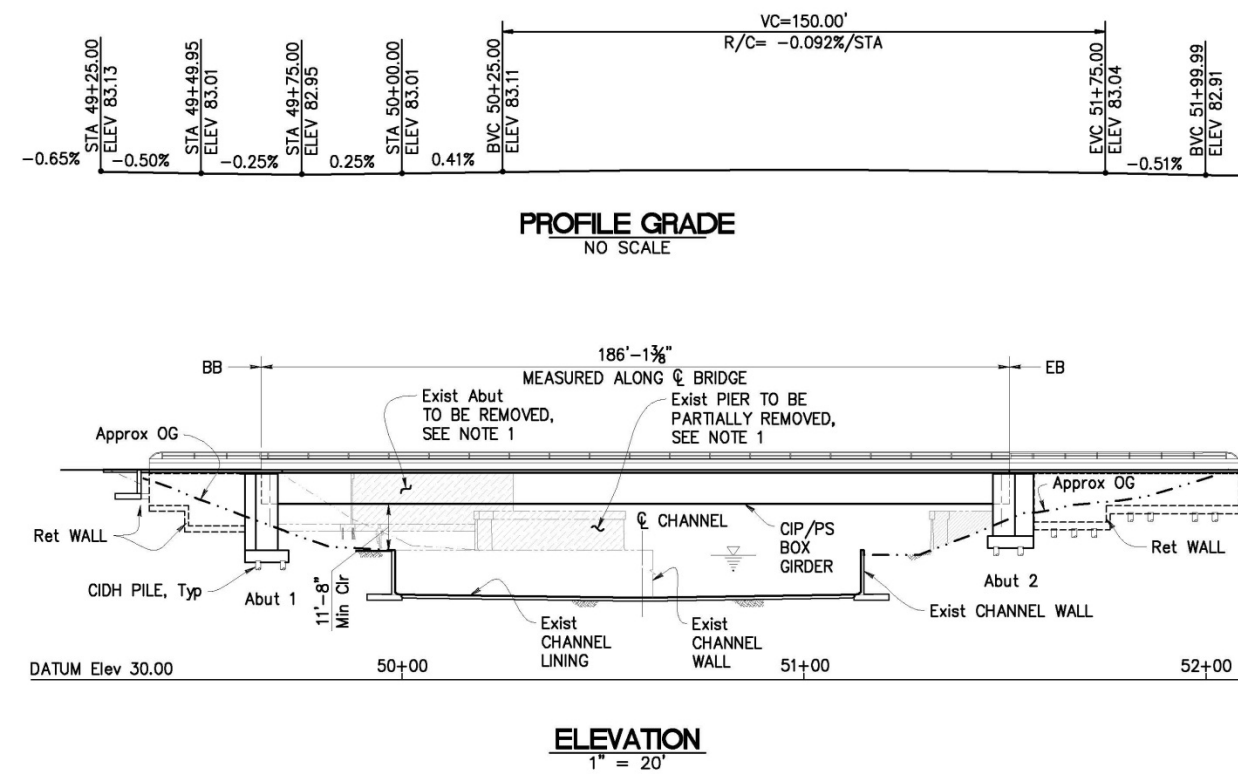


Figure 3. PROJECT AREA MAP
Higuera Street Bridge Replacement



Figure 4: Project Plans



LEGEND:

- Existing Structure
- New Structure
-  Existing Structure Removal
-  Direction of Traffic
-  Direction of Flow
-  Point of Minimum Vertical Clearance
- (A) Paint "Bridge No. 54-0781"
- (B) Paint Bridge Name
- (C) Concrete Barrier (Type 26)
- (D) Structure Approach Type N(30S)

NOTE:

1. For Details, see "DEMOLITION PLAN" Sheet.

NOTE: The Contractor shall verify all controlling dimensions before ordering or fabricating any material.



HATCH / LINE LEGEND

	RIGHT OF WAY
	CONSTRUCTION CENTERLINE
	EXISTING CENTERLINE
	RIGHT OF WAY/EASEMENT

#	DELTA/BRC	RADIUS	LENGTH	TANGENT
A	N81°13'13"W	—	242.89'	—
B	N86°25'12"W	—	310.77'	—
C	N81°13'13"W	—	297.69'	—
D	N86°25'12"W	—	421.08'	—
E	N51°11'29"E	—	6.77'	—
F	N03°34'48"E	—	5.00'	—

RIGHT OF WAY/EASEMENT TABLE		
	AREA (SF)	OWNER
1	718	PRIVATE
2	2875	LACFCD
3	73	PRIVATE
4	1285	LACFCD
5	1011	LACFCD

A horizontal number line with two tick marks. The first tick mark is labeled '15' and the second tick mark is labeled '16'.



CITY OF CULVER CITY

DEPARTMENT OF PUBLIC WORKS

CHARLES D. HERBSTON, P.E., L.S. CITY ENGINEER

BIKE RAMP PROFILE

CULVER CITY HIGUERA STREET

BRIDGE REPLACEMENT

HIGUERA STREET FROM EASTHAM DR

WORK ORDER NO.
E6000591

DRAWING NO.

VERTICAL CONTROL: SEE TITLE SHEET

HORIZONTAL CONTROL: SEE TITLE SHEET

SHEET TITLE

PROJECT: CULVER CITY HIGUERA STREET
BRIDGE REPLACEMENT

ADDRESS: HIGUERA STREET FROM EASTHAM DR

ENGINEER: X. WU, PE

DESIGNED BY: L. LIU

DRAWN BY: G. ESTEPA

CHECKED BY: F. HAKEMI, PE

DESIGN GROUP

DATE:

ENGINEER: X. WU, PE

DESIGNED BY: L. LIU

DRAWN BY: G. ESTEPA

CHECKED BY: F. HAKEMI, PE

ENGINEER: X. WU, PE

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ENGINEER: X. WU, PE

DESIGNED BY: L. LIU

DRAWN BY: G. ESTEPA

CHECKED BY:

Several utilities within the existing Bridge structure would be replaced, including an American Telephone and Telegraph (AT&T) telephone conduit and a Golden State Water Company water main (to be upgraded). Existing Southern California Edison (SCE) high voltage transmission power poles on the north side of the Bridge would be protected in place, with the exception of one guy-wire pole at the southwest corner of the Bridge. There are streetlight, traffic signal, sewer, and storm drain facilities both east and west of the Bridge structure. Streetlight and traffic signal pull boxes, cabinets, and other facilities would be relocated, and storm drain catch basins, adjacent driveway approaches, and signs would be reconstructed and adjusted to grade. One drainage outlet located at the southwest corner of the Bridge, which currently drains onto the Bike Path, may need to be relocated.

Existing Conditions:

Because the portion of Higuera Street within the Project area is located near Culver City's eastern border, it serves as a main access point for vehicles traveling between Los Angeles and Culver City. The boundaries of the Project area include the footprint of the new (70-foot wide) Bridge, ramp connection, and associated improvements. The boundaries also include the footprint of adjacent temporary construction areas on the Bridge approaches and below the Bridge.

The Bridge crosses over the Creek, a 9-mile flood protection channel that drains the Los Angeles basin from the Santa Monica Mountains on the north, the Harbor Freeway (Interstate 110) on the east, and the Baldwin Hills on the south. The Creek's watershed encompasses approximately 130 square miles. Approximately four miles of the Creek are within Culver City limits. The portion of the Creek in the Project area is a concrete-lined channel that flows from northeast to southwest beneath the Project area.

The Bike Path runs along the western bank of the Creek and crosses under the Bridge. The existing Bridge has neither a pedestrian nor bicycle connection to the Bike Path; the nearest access points are at National Boulevard (approximately 0.4 mile to the north) and Duquesne Avenue (approximately 0.7 mile to the southwest). The Bike Path is part of the Ballona Creek Trail System, a 10- to 12-foot wide paved trail extending almost seven miles along the entire length of the Creek, from National Boulevard in Culver City to the end of the Ballona Creek Estuary in Santa Monica Bay. The Bike Path is located within the LACFCD ROW.

According to the City's Bicycle and Pedestrian Master Plan, the Bike Path is an existing multi-use (Class I) bike path that accommodates cyclists, pedestrians, and other users (City, 2010a). The plan also identifies that the Bike Path is the primary off-street bicycle path in Culver City and facilitates both utilitarian (e.g. commuting or errand-running) as well as non-utilitarian (e.g. exercising or recreational) trips.

Surrounding Land Uses and Setting:

The majority of the Project area is located within the boundaries of Culver City, with a small portion crossing over Culver City's eastern border into Los Angeles. The Project area is located in an urban setting and is adjacent to commercial, industrial, and open space land uses.

The City's General Plan divides Culver City into sub-areas; the Project area is located in the Eastern Sub-Area. Specifically, the Project area is located in the Hayden Industrial Tract, Culver City's largest and oldest contiguous industrial area, which includes approximately eight large City blocks from Higuera Street to Jefferson Boulevard. The Hayden Industrial Tract is occupied by a variety of businesses, ranging from manufacturing to design and entertainment-related firms. In

the Hayden Industrial Tract, the buildings adjacent to the Bridge are occupied by a print shop to the northwest and a gymnastics school to the southwest. Beneath the Bridge, the Creek and the Bike Path are designated as open space.

The small portion of the Project area within Los Angeles is located within the community plan area of the West Adams – Baldwin Hills – Leimert Community Plan. Specifically, the Project area is in the community of Baldwin Hills. In Baldwin Hills, the buildings adjacent to the Bridge are occupied by a plant nursery to the northeast and a recycling center to the southeast.

The surrounding area includes residential neighborhoods and open space. The Lucerne-Higuera residential neighborhood in Culver City is approximately 0.3 mile west of the Project area, and another residential development (Cameo Woods) is approximately 0.13 mile east in Baldwin Hills. The Baldwin Hills Scenic Overlook State Park is approximately 0.2 mile southwest of the Project area, and the Kenneth Hahn State Recreation Area is approximately 0.4 mile southeast.

The following land uses are adjacent to the Project area:

West: Industrial – Hayden Industrial Tract Focused Special Studies Area

East: Limited Industrial

North: Open Space – Ballona Creek Focused Special Studies Area

Industrial – Hayden Industrial Tract Focused Special Studies Area

South: Open Space – Ballona Creek Focused Special Studies Area

Industrial – Hayden Industrial Tract Focused Special Studies Area

Industrial

Other public agencies whose approval is required:

Caltrans – Approval of technical studies and National Environmental Quality Act (NEPA) documents;

United States (U.S.) Army Corps of Engineers (USACE) – Section 404 Nationwide Permit;

Los Angeles Regional Water Quality Control Board (RWQCB) – Section 401 Water Quality Certification; and

California Department of Fish and Wildlife (CDFW) – Section 1602 Streambed Alteration Agreement.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Thomas Gorham
Signature

11/18/14
Date

THOMAS GORHAM PLANNING MANAGER
Printed Name, Title

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
Responses:				
a) Less Than Significant Impact. A scenic vista can be defined as a viewpoint that provides expansive views of a highly-valued landscape. The Project area is visible from the existing Bridge and Bike Path, and is a dominant feature in the viewshed from the Baldwin Hills Scenic Overlook State Park. The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path. The wider Bridge would present a more visually dominant structure in the visual setting; however, the design of the new Bridge would be similar to the existing Bridge, and the Project would not include any vertical elements that would block or otherwise distort views to or from the surrounding area. The new bike ramp connection would be a new visual feature that includes new pavement, retaining wall, and vegetation, which would be visually compatible with the existing landscape and visual setting, and would not be expected to substantially affect views from the Bridge, Bike Path, or Baldwin Hills Scenic Overlook State Park. During construction of the Project, onsite storage of construction materials and debris would result in visual impacts; however, these impacts would be temporary and during construction, all trash and construction debris would be removed from the channel and construction areas daily. Following construction, all construction equipment, materials, and scaffolding would be removed from the Project area. Implementation of the Project would not substantially degrade views from the Bridge, Bike Path, or the Baldwin Hills Scenic Overlook State Park. Therefore, impacts would be less than significant. b) No Impact. The Project area is not located within or near a state scenic highway (Caltrans, n.d.). Therefore, there would be no impact. c) Less Than Significant Impact. Higuera Street is a paved roadway that passes through an industrial area in Culver City. The Bridge crosses over the Creek, which flows through a concrete-lined, open channel. Water flow in the channel varies throughout the year. Historically a natural waterway, the Creek now serves primarily as a flood-control channel and recreational area. The Bike Path, owned by Los Angeles County (County), runs along the west side of the Creek and is used by pedestrians and bicyclists for both recreation and commuting. The Bike Path is separated from the Creek by a wire-cable fence. There is a steep concrete slope adjacent to the west side of the path, which is tagged with graffiti. At the top of the concrete slope, there is an additional expanse of dirt slope with some weedy vegetation. The primary viewers that could be impacted by the Project include viewers on Higuera Street, on the Bike Path, or at Baldwin Hills Scenic Overlook State Park. The wider Bridge would present a more visually dominant structure in the visual setting; however, the design of the new Bridge would be similar to the existing Bridge, and the Project would not include any vertical elements that would block or otherwise distort views to or from the surrounding area. Therefore, the new structure would not be expected to detract from the visual quality of the				

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	---	------------------------------------	--------------

area.

The new bike ramp connection from Higuera Street to the existing bike trail along the Creek would be a new visual feature, but because the existing corridor is mostly paved, it would not substantially change the visual character in the Creek corridor. In order to construct the Bike Path connection, some vegetation would be removed at the top of the northwest slope adjacent to the Bike Path; however, the existing vegetation consists of disturbed and weedy species, and vegetation removal would not be expected to result in substantial changes to the existing visual setting. Following construction, new landscaping would be installed along the Bike Path connection; these elements would be visually compatible with the surrounding landscape and visual setting, and would be expected to enhance the aesthetics of the area.

During construction of the Project, onsite storage of construction materials and debris would result in visual impacts; however, these impacts would be temporary and during construction all trash and construction debris would be removed from the channel and construction areas daily. Following construction, all construction equipment, materials, and scaffolding would be removed from the Project area. Implementation of the Project would not result in substantial changes to the existing visual character or quality of the site or its surroundings. Therefore, impacts would be less than significant.

- d) **Less Than Significant Impact.** The existing Bridge is constructed of concrete and green metal beams, which do not present a substantial amount of daytime or nighttime glare. There are streetlights both east and west of the Bridge structure, and along Eastham Drive, as well as traffic signal lights at the adjacent intersections, but no lights on the Bridge itself. An additional source of nighttime lighting and glare includes vehicle headlights. The Project would result in minor changes to the horizontal alignment (widening) of the Bridge; however, this would not be expected to result in substantially increased or altered nighttime glare from vehicle headlights. The new Bridge would be designed with materials similar to those of the existing Bridge and would not be expected to result in substantially increased daytime or nighttime glare. No additional lighting is proposed as part of the Project. Therefore, impacts would be less than significant.

Mitigation Measure(s): None Required

II. AGRICULTURE RESOURCES AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | ☐ | ☐ | ☐ | ☒ |

EVALUATION OF ENVIRONMENTAL IMPACTS:

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Responses:

- a) **No Impact.** According to the California Department of Conservation, there is no designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) within or near the Project area (2011). Therefore, there would be no impact.
- b) **No Impact.** There are no areas that are zoned for agricultural use or under a Williamson Act contract within or near the Project area; therefore, there would be no impact.
- c) **No Impact.** There are no areas that are zoned for forest land within or near the Project area; therefore, there would be no impact.
- d) **No Impact.** There is no forest land within or near the Project area, therefore, there would be no impact.
- e) **No Impact.** There is no Farmland or forest land within or near the Project area; therefore, there would be no impact.

Mitigation Measure(s): None Required

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Responses:

- a) **No Impact.** The most recently approved applicable air quality plan for the Project area is the 2007 Air Quality Management Plan (AQMP), which was designed to meet both federal and state requirements and serves as the basis for preparation of the State Implementation Plan (SIP) for the State of California. The AQMP strategy is based on projections from local general plans and regional growth projections developed by the Southern California Association of Governments (SCAG). A project would be considered inconsistent with an AQMP if the

EVALUATION OF ENVIRONMENTAL IMPACTS:

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project would 1) result in population and/or employment growth that exceeds growth estimates included in the AQMP, or 2) result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards.

The Project would include replacing the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path. Implementation of the Project would not affect population, housing units, or employment, or be inconsistent with the growth forecasts identified in the AQMP. In addition, the Project was included in the regional emissions analysis conducted by SCAG for the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Amendment #1 (SCAG, 2013). The Project is also included as Project ID #LAOG451 in SCAG's 2013 Federal Transportation Improvement Program (FTIP), Amendment #13-17, which allocates funding to implement the RTP (SCAG, 2014).

The 2012-2035 RTP/SCS, Amendment #1 and 2013 FTIP, Amendment #13-17 comply with the transportation conformity requirements in the United States Environmental Protection Agency's (U.S. EPA) Transportation Conformity Regulations. Transportation conformity is required by the Clean Air Act to ensure that federal funding and approval are given to highway and transit projects that are consistent with (i.e., conform to) the air quality goals established by the SIP. Conformity with the SIP means that transportation activities would not cause new air quality violations, exacerbate existing violations, or delay timely attainment of the national ambient air quality standards. The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) determined that the 2012-2035 RTP/SCS, Amendment #1 conformed to the SIP on July 15, 2013, and the 2013 FTIP, Amendment #13-17 conformed to the SIP on April 30, 2014.

Because the Project's design concept and scope have not changed from what was analyzed in the RTP, Project-related air quality impacts would be consistent with those identified in the 2007 AQMP and the SIP for achieving air quality standards. Therefore, implementation of the Project would not conflict or obstruct implementation of the 2007 AQMP, and there would be no impact.

- b) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project would not result in an increased number of through lanes at the adjacent Higuera Street/Eastham Drive and Higuera Street/Jefferson Boulevard intersections, and would not increase capacity or result in additional cars on the Bridge; therefore, the Project would not result in the generation of new stationary or mobile sources of emissions during long-term operation.

Emissions modeling was conducted to determine estimated operational emissions of criteria pollutants that would result from the Project (AMBIENT, 2014). As shown in **Table 1**, under Future (Horizon Year 2035) Plus Project conditions, emissions of reactive organic gases (ROG), carbon monoxide (CO), oxides of nitrogen (NO_x), and particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}) are projected to decrease slightly from Existing (Year 2014) Pre-Project conditions, largely a result of improvements in vehicle emissions standards. Particulate matter equal to or less than 10 microns in diameter (PM₁₀), a result of road dust associated with predicted future increases in traffic volumes (unrelated to the Project), is projected to increase slightly by 0.16 ton (or 320 pounds) per year. Projected PM₁₀ emissions would not exceed the South Coast Air Quality Management District (SCAQMD) significance threshold for PM₁₀, which is 150 pounds per day during Project operation. Long-term operation of the Project would not result in air quality violations or contribute substantially to an existing or projected air quality violation; therefore, long-term operational impacts would be less than significant.

Table 1: Estimated Operational Emissions of Criteria Air Pollutants

Scenario	Emissions (Tons Per Year)				
	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Existing (Year 2014)	0.01	0.34	0.04	1.06	0.93
Future (Horizon Year 2035) Plus Project	0.00	0.16	0.02	1.22	0.80

Source: AMBIENT, 2014

EVALUATION OF ENVIRONMENTAL IMPACTS:

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Project construction would result in temporary, short-term fugitive dust and exhaust emissions produced by construction equipment. Fugitive dust emissions would include any solid particulate matter that is lifted into the ambient air during demolition and soil disturbance activities. Exhaust emissions would include ROG, CO, NO_x, PM₁₀, and PM_{2.5} from the use of heavy-duty trucks and construction equipment powered by gasoline and diesel engines.

Emissions modeling was conducted for each of the major construction phases of the Project, based on the estimated area of daily disturbance and construction phasing durations. Estimated daily construction emissions are summarized in **Table 2**. Projected emissions would be below the SCAQMD significance thresholds for all criteria air pollutants, except for NO_x, which would exceed the threshold by 97.5 pounds per day.

Table 2: Estimated Maximum Daily Construction Emissions

Construction Phase	Emissions (Pounds Per Day)				
	ROG	CO	NO _x	PM ₁₀	PM _{2.5}
Site Clearing/Preparation	2.2	12.7	22.5	28.0	6.6
Grading & Excavation	16.6	80.9	183.8	35.5	13.4
Bridge Widening & Related Construction	11.9	55.3	122.0	33.2	11.2
Paving	2.5	13.0	20.9	1.4	1.3
Haul Trucks	0.4	1.7	13.7	0.4	0.2
Maximum (pounds per day)	17.0	82.6	197.5	35.9	13.6
SCAQMD Significance Thresholds for Construction	75	550	100	150	55

Source: AMBIENT, 2014; SCAQMD, 2011

Standard best management practices (BMP) would be incorporated into the Project, including, but not limited to, restrictions on idling, maintenance of construction equipment, and dust control. In addition, mitigation measures A-1 through A-12-15 would be implemented during construction, which would reduce pollutant emissions from construction activities. Construction activities would be short-term, and with the implementation of mitigation measures A-1 through A-12-15, Project construction would not be expected to result in a violation any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, impacts would be less than significant.

- c) **Less than Significant Impact.** The Project area is located in the South Coast Air Basin, which is currently in non-attainment for both state and federal ambient air quality standards for O₃, PM₁₀, and PM_{2.5}, and in non-attainment for the state nitrogen dioxide (NO₂) standard. The Project would not result in an increased number of through lanes at the adjacent Higuera Street/Eastham Drive and Higuera Street/Jefferson Boulevard intersections, and would not increase capacity or result in additional cars on the Bridge; therefore, the Project would not result in long-term generation of new criteria pollutant emissions. In addition, implementation of the Project would not result in population or job growth, and would be consistent with the AQMP; therefore, the Project would not result in indirect effects (i.e., induced growth) that could lead to cumulatively considerable increases in criteria pollutants.

Construction activities would be short-term, and with the implementation of mitigation measures A-1 through A-12-15; therefore, any potential increase in criteria pollutants resulting from construction activities would not be cumulatively considerable. Therefore, impacts would be less than significant.

- d) **Potentially Significant Impact Unless Mitigation Incorporated.** Sensitive receptors are persons who are more susceptible to air pollution than the general population, such as children, athletes, the elderly, and the chronically ill. Sensitive receptors are also areas where individual sensitive receptors may be found, such as residences, schools, daycare centers, parks, recreation areas, medical facilities, nursing homes, and convalescent care

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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facilities. The nearest sensitive receptors to the Project area are the Willows Community School, approximately 350 feet to the west, and residential land uses, approximately 600 feet to the east. While emissions from construction would be short-term, diesel-powered construction equipment could generate emissions that may impact sensitive receptors. With implementation of mitigation measure A-12 below, impacts would be less than significant.

- e) **Less Than Significant Impact.** Diesel exhaust generated by construction equipment could result in objectionable odors in and near the Project area that could be objectionable to people; however, these odors would be temporary, limited to daytime hours, and isolated to the immediate vicinity of construction activities. Potential odors from the Project would not be expected to affect a substantial number of people. Therefore, impacts would be less than significant.

Mitigation Measure(s):

To mitigate impacts on air quality, the following mitigation measures will be implemented during Project construction:

A-1 Water or Dust Palliative

Water or dust palliative will be applied to the Project area and equipment as frequently as necessary to control fugitive dust emissions. Fugitive emissions generally must meet a "no visible dust" criterion either at the point of emission or at the right of way line depending on local regulations.

A-2 Soil Binder

Soil binder will be spread on any unpaved roads used for construction purposes, and all Project construction parking areas.

A-3 Truck Washing

Trucks will be washed off as they leave the right of way as necessary to control fugitive dust emissions.

A-4 Dust Control Plan

A dust control plan will be developed to document sprinkling, temporary paving, speed limits, and expedited revegetation of disturbed slopes as needed to minimize fugitive dust emissions.

A-5 Location of Equipment and Materials Storage Sites

Equipment and materials storage sites will be located as far away from residential and/or public space areas as practical, and construction areas will be kept clean and orderly.

A-6 Track-Out Reduction Measures

Track-out reduction measures, such as gravel pads, will be used at Project access points to minimize dust and mud deposits on roads affected by construction traffic.

A-7 Covering and Wetting of Transported Soils and Adequate Freeboard

All transported loads of soils will be covered and materials will be wetted prior to transport, or adequate freeboard (space from the top of the material to the top of the truck) will be provided to minimize emissions of dust (particulate matter) during transportation.

A-8 Removal of Dust and Mud on Roads

Dust and mud that are deposited on paved, public roads from construction activity and traffic will be promptly and regularly removed to decrease particulate matter.

A-9 Mulch or Plant Vegetation

Mulch or plant vegetation will be installed as soon as practical after grading to reduce windblown particulate in the

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area. Certain methods of mulch placement, such as straw blowing, may themselves cause dust and visible emission issues and may need controls such as dampened straw.

A-10 Equipment and Vehicle Maintenance

Construction equipment and vehicles will be properly tuned and maintained. Low-sulfur fuel will be used in all construction equipment as provided in California Code of Regulations Title 17, Section 93114.

A-11 Construction Traffic Routing and Scheduling

Construction traffic will be routed and scheduled to avoid peak travel times as much as possible, to reduce congestion and related air quality impacts caused by idling vehicles along local roads.

A-12 Sensitive Receptor Buffer

Extended idling (i.e., no more than five consecutive minutes) of heavy-duty diesel-powered construction equipment within 500 feet of nearby sensitive receptors (i.e., Willows Community School) will be prohibited during periods when the equipment is not in use.

A-13 Public Concerns Regarding Dust Control

The dust control plan shall identify a designated person to receive phone calls regarding concerns related to fugitive dust emissions and/or compliance with identified fugitive dust control measures. The designated person may include a member of City staff. The name and telephone number of the designated person shall be provided to the City prior to the start of any grading, earthwork, or demolition.

A-14 Public Notification

Signs shall be posted at the Project area entrance and written notifications shall be provided a minimum of 30 days prior to initiation of project construction to residential properties and businesses located within 300 feet of the Project area. The signs and written notifications shall include the following information: (a) Project Name; (b) Anticipated construction schedule(s); and (c) Telephone number(s) of the designated person.

A-15 Documentation and Notification of Dust Control Concerns

The designated person will document and immediately notify the City's Public Works Department of any air quality complaints received. If necessary, the applicant and/or contractor will coordinate with the City's Public Works Department to identify any additional feasible measures and/or strategies to be implemented to address public complaints.

IV. BIOLOGICAL RESOURCES -- Would the project:

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| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ☐ | ☒ | ☐ | ☐ |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |

EVALUATION OF ENVIRONMENTAL IMPACTS:		Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

Responses:

a) **Potentially Significant Impact Unless Mitigation Incorporated.** Surveys of the Project area were conducted on October 18 and October 20, 2011, and June 20, 2013. Based on existing habitat, potential for threatened or endangered species to be in the Project area is considered low, and no sensitive species were observed during the biological surveys. Expansion joints in the upper concrete portion of the Bridge could provide roosting habitat for bats; therefore, there is potential for bats to be in the Project area. Swallow nests were observed on the Bridge, and there is the potential for bank swallows to nest on the Bridge. There is also potential for birds to nest in vegetation within the Project area.

Structure demolition and vegetation removal required for construction of the Project could result in direct or indirect impacts on nesting birds, if they are on or adjacent to the Bridge structure or vegetation to be removed. Temporary noise-generating activities, such as drilling holes for CIDH piles, could result in temporary impacts on nesting birds and other wildlife. However, with implementation of mitigation measures B-1 through B-13 listed below, impacts would be less than significant.

b) **No Impact.** There are no sensitive natural communities in the Project area that are identified in local or regional plans, policies, or regulations or by CDFW or United States Fish and Wildlife Service (USFWS); therefore, there would be no impact.

c) **No Impact.** Ballona Creek is a concrete lined channel and is considered non-wetland waters of the United States (U.S.) and state. There are no wetlands in the Project area; therefore, there would be no impact on wetlands. The Project would result in temporary impacts on waters of the U.S. and state from construction equipment accessing the channel, installation of a water diversion, if needed, and construction crews working below the Bridge. The Project would not result in permanent impacts on waters of the U.S.

Because the Project would result in temporary impacts on waters of the U.S., a Section 404 permit would be required. The Project is expected to be permitted under Section 404 Nationwide Permit 14 for linear transportation projects. Because there would be no permanent impacts on waters of the U.S., a Pre-Construction Notification package is not required. Because the Project requires a 404 Permit, a Section 401 Water Quality Certification would be required from the applicable RWQCB under Clean Water Act (CWA) Section 401. A Water Quality Certification Package would be submitted to the RWQCB prior to Project construction.

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Under Section 1602, the limits of CDFW's jurisdiction within creeks and other drainages extends from the top of the bank to the top of the opposite bank, to the outer drip line in areas containing riparian vegetation, and /or within the 100-year floodplain of a stream or river system containing fish or wildlife resources. Because impacts on waters of the state would result from construction equipment accessing and working in the Creek, a Section 1602 Streambed Alteration Agreement from CDFW would be required. A Streambed Alteration Agreement Notification package would be submitted to CDFW prior to Project construction.

- d) **Potentially Significant Impact Unless Mitigation Incorporated.** The Creek is concrete lined and water flow is limited; therefore, the Creek not considered a migratory corridor for aquatic species. The Project area is located in an urban setting and is likely only used for foraging or local movement and is not considered a regional wildlife movement corridor. As discussed in response a), construction activities could result in impacts on nesting birds and other wildlife species; however, with the implementation of mitigation measures B-1 through B-13 listed below, impacts would be less than significant.
- e) **No Impact.** The Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, there would be no impact.
- f) **Less Than Significant Impact.** There are no habitat conservation plans or natural community conservation plans that are applicable to the Project area. The Ballona Creek and Trail Focused Special Study covers the Project area and identifies improvement projects to enhance the Creek. The Project would not conflict with the goals of this study; therefore, impacts would be less than significant.

Mitigation Measure(s):

To mitigate potentially significant impacts on biological resources, the following mitigation measures would be implemented during Project construction.

B-1 Reduced Work Area

Construction areas would be reduced to the maximum extent feasible to avoid impacts on migratory birds and raptors and minimize impacts on jurisdictional areas.

B-2 Work Performed Outside of the Nesting Season

Construction activities within 300 feet of potential nesting areas (500 feet for potential raptor nests) would be scheduled outside of the nesting bird season (the nesting period is typically February 15 to September 15) to the extent feasible. Vegetation trimming for the Project would be minimized and would be performed outside of the nesting season to the extent feasible.

B-3 Nesting Bird Surveys

If construction is scheduled during bird nesting season, nesting bird surveys would be completed no more than 48 hours prior to construction to determine if nesting birds, raptors, or active nests are on the Bridge, beneath the Bridge, or within 500 feet of the construction area. Surveys would be repeated if construction activities are suspended for five days or more.

B-4 Vegetation Clearing

If vegetation trimming or clearing needs to be conducted during the nesting season, nesting bird surveys would be completed by a qualified biologist no more than 48 hours prior to trimming or clearing activities to determine if nesting birds are within the affected vegetation. Surveys would be repeated if trimming or removal activities are suspended for five days or more.

B-5 Nesting Bird Buffer

If nesting birds are found in the Project area, appropriate buffer areas (typically 300 feet for birds and up to 500 feet for raptors) would be implemented, in coordination with the appropriate resource agencies, to ensure that nesting

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birds and active nests are not harmed.

B-6 Bat Surveys

Outside of the breeding and torpor seasons (typically late fall in October-November), the Bridge structure would be thoroughly surveyed for bats by a qualified biologist with bat experience to identify any active or potential bat-roosting cavities. If any bats are found roosting in the Bridge, they would be safely excluded under the direction of the approved biologist and under consultation with the CDFW.

B-7 Bat Exclusion Devices

Once it has been determined that all roosting bats have been safely excluded from the Bridge, exclusionary devices approved by the CDFW would be installed and maintained to prevent bats from roosting in these areas prior to and during construction. A summary report would be prepared upon completion of these activities and submitted to the CDFW.

B-8 Pre-Construction Wildlife Surveys

Pre-construction wildlife surveys would be completed by a qualified biologist no more than 48 hours prior to clearing, grubbing, or other activities to determine the presence/absence of nesting birds, bats or other sensitive species within 300 feet of the construction area. Surveys would be repeated if construction activities are suspended for five days or more. If any wildlife species are identified, appropriate measures would be developed and implemented to avoid impacts on these species, in consultation with resource agencies as applicable.

B-9 Invasive Species

Vegetation removed from the Project area would be treated and disposed of in a manner that would prevent the spread of invasive species on- or off-site. New landscaping materials, including erosion control seed mixes, would be composed of non-invasive species, and all erosion control and landscape planting would be conducted in a manner that would not result in the spread of invasive species.

B-10 Staging Areas

Staging areas would be outside the channel to reduce direct and indirect impacts on Ballona Creek.

B-11 Best Management Practices

BMPs would be implemented to reduce dust, dirt, and construction debris from leaving the construction area.

B-12 Equipment Refueling and Maintenance

All equipment refueling and maintenance would be conducted in the staging area per standard specifications. In addition, BMPs would be implemented during construction to reduce potential impacts associated with leaks and spills of oil, fuel, or machinery fluids.

B-13 All Materials and Trash Removed

All trash and construction debris would be removed from the channel and construction areas on a daily basis. All BMPs would be properly maintained during Project construction, and removed upon completion of construction activities. After completion of the Project, all construction equipment, materials, and scaffolding would be removed from the Project area.

V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?

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EVALUATION OF ENVIRONMENTAL IMPACTS:

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Responses:

- a) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the existing Bike Path. Implementation of the Project would not require demolition or modification to any buildings or structures besides the Bridge. To complete the Project, ROW acquisition of approximately 791 square feet (0.02 acre) of private land adjacent to the Bridge would be required from two parcels to the south of the Bridge. Permanent easements of approximately 5,171 square feet (0.12 acre) of land would be required from three LACFCD parcels adjacent to the Bridge. The Area of Potential Effects (APE) that was studied included these areas.

The Bridge was inventoried by Caltrans and determined not to be eligible for the National Register of Historic Places (NRHP) (Caltrans, 2013). According to a records search completed for the Project APE, no known archaeological or historical sites within the Project area, and the area has been previously disturbed, there is a low potential for cultural resources to be in the Project area, and discovery or disturbance of cultural resources is not anticipated. Therefore, there would be no impact.

- b) - d) **Potentially Significant Impact Unless Mitigation Incorporated.** The project site is developed and located in an urbanized area surrounded by existing disturbed land and development. The potential does exist for fossil resources, burial sites, and other paleontological/anthropological resources to be unearthed during construction activities. There have been identified archaeological resources at construction sites near the project site and upon excavation, such a resource could surface. This potential impact is considered significant without mitigation and a mitigation requiring a Phase 1 Archaeological/Paleontological Survey prior to construction will be required. Implementation of the recommended mitigation measure below would reduce the significance of potential impacts to a less than significant level.

Mitigation Measure(s):

To mitigate potentially significant impacts on cultural resources, the following mitigation measures will be implemented during Project construction.

C-1 Archaeological/Paleontological Survey

Prior to construction, a Phase 1 Archaeological/Paleontological Survey shall be completed and submitted to the Planning Manager for review. If the Phase 1 Archaeological/Paleontological Survey indicates the presence of archaeological and/or paleontological resources, then an archaeological and/or paleontological professional(s), approved by the City, shall monitor all phases of the excavation for the project site. In the event that the Phase 1 Archaeological/Paleontological Survey determines that no such resources exist but undetected fossil resources and/or human remains, or other archaeological/paleontological resources are encountered during construction activities, work in that area must be halted, and both the City of Culver City and the coroner must be notified. Standard measures required by California Health and Safety Code Section 7050.5 will be followed. Work will be halted in that area of the detected resource until the City of Culver City's archaeologist, paleontologist and Native American representatives have been contacted to evaluate the resources and permission to commence work in

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
that area has been given by the City of Culver City.				
VI. GEOLOGY AND SOILS -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
Responses:				
a) See responses below.				
i) Less Than Significant Impact. According to the City's Alquist-Priolo Map, the Newport-Inglewood Fault Zone is less than 0.2 mile east of the Project area (City, 2007a). There are no fault lines or earthquake fault zones in the Project area. The Project would include replacing and widening the existing Bridge, and the new Bridge would be designed to meet required seismic and geometric standards and would be constructed in compliance with the California Building Code and the City's Municipal Code. Therefore, impacts would be less than significant.				
ii) Less Than Significant Impact. The Project area is in the seismically active Southern California region, where several major earthquakes have occurred and there is high potential for strong seismic ground shaking. However, the new Bridge would be designed to meet required seismic and geometric standards and would be constructed in compliance with the California Building Code and the City's Municipal Code, which would substantially reduce the potential for risk of loss, injury, or death involving seismic ground shaking. Therefore, impacts would be less than significant.				
iii) Less Than Significant Impact. According to an October 2011 subsurface investigation of the Project area, the soils underlying the Project area are not susceptible to liquefaction (City, 2011). However, as stated in response a) ii) above, there is potential for strong seismic ground shaking to occur in the Project area based				

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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on its geographical location. However, the new Bridge would be designed to meet required seismic and geometric standards and would be constructed in compliance with the California Building Code and the City's Municipal Code, which would substantially reduce the potential for risk of loss, injury, or death involving liquefaction. Therefore, impacts would be less than significant.

- iv) **No Impact.** According to the City's Seismic Hazards Map, there are no landslide hazard zones in or near the Project area (City, 2007d). In addition, the topography of the Project area is relatively flat (USGS, 1995); therefore, the Project area is not susceptible to landslides, and there would be no impact.
- b) **Less Than Significant Impact.** Project construction would require the removal of some existing trees and vegetation. Cut and fill, and excavation down to 50 feet bgs, would also be required. The total area to be disturbed on the Project area would be approximately 1.83 acres for the Bridge and 0.9 acre for the new ramp connection. Standard Best Management Practices (BMP) would be implemented to minimize the potential for soil erosion during construction, and after construction is complete, exposed soils would either be paved or be stabilized through compaction or re-vegetation. Operation of the Project would not result in soil erosion or loss of topsoil; therefore, impacts would be less than significant.
- c) **Less Than Significant Impact.** According to the City's Seismic Hazards Map, there are no landslide hazard zones in or near the Project area (City, 2007d). In addition, according to an October 2011 subsurface investigation of the Project area, the soils underlying the Project area are not susceptible to liquefaction (City, 2011a). No events related to off-site landslides, lateral spreading, subsidence, liquefaction, or collapse have occurred in the Project area since the original construction of the Bridge. In addition, the new Bridge would be designed to meet required seismic and geometric standards and would be constructed in compliance with the California Building Code and the City's Municipal Code; therefore, impacts would be less than significant.
- d) **Less Than Significant Impact.** There is no available information on whether there are expansive soils in the Project area, but an October 2011 subsurface investigation of the Project area identified that the Project area is underlain by compressible soils near the surface (City, 2011a). Because of the compressible soils and the anticipated load demands, deep bridge foundations are proposed to support the new Bridge. The new Bridge would also be designed to meet required seismic and geometric standards and would be constructed in compliance with the California Building Code and the City's Municipal Code, as well as the recommendations presented in the subsurface investigation, which would substantially reduce risk to life and property; therefore, impacts would be less than significant.
- e) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path. The Project would not require the use of septic tanks or alternative wastewater disposal systems; therefore, there would be no impact.

Mitigation Measure(s): None Required

VII. GREENHOUSE GAS EMISSIONS --Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

Responses:

- a) **Less Than Significant Impact.** The Project would not result in an increased number of through lanes at the

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adjacent Higuera Street/Eastham Drive and Higuera Street/Jefferson Boulevard intersections, and would not increase capacity or result in additional cars on the Bridge; therefore, operation of the Project would not result in the generation of new sources of greenhouse gas emissions.

Emissions modeling was conducted to determine estimated operational emissions of greenhouse gases that would result from the Project (AMBIENT, 2014). As shown in **Table 3**, emissions under Future (Horizon Year 2035) Plus Project conditions are predicted to decrease by approximately 11.76 million metric tons of carbon dioxide equivalents per year (MtCO₂e/year). These projected reductions in greenhouse gas emissions are a result of projected improvements in vehicle emissions. Long-term operation of the Project would not generate substantial greenhouse gas emissions, either directly or indirectly; therefore, long-term operational impacts would be less than significant.

Table 3: Estimated Annual Greenhouse Gas Emissions in the Project Area

Scenario	Greenhouse Gas Emissions (MtCO ₂ e/year)
Existing (Year 2014)	63.52
Future (Horizon Year 2035) Plus Project	51.76

Source: AMBIENT, 2014

Construction-related greenhouse gas emissions are typically generated by motorized vehicles used for material transportation or the commute of construction workers. Construction of the Project would result in the generation of temporary, short-term emissions of greenhouse gases; the amount of emissions generated would vary depending on multiple factors, including the type of equipment used and the length of use. Mobile source emissions from construction equipment are typically highest during use of heavy-duty, diesel-fueled equipment. Emissions modeling was conducted for each of the major construction phases of the Project, based on the estimated area of daily disturbance and construction phasing durations. Estimated daily construction emissions are summarized in **Table 4**.

Table 4: Construction-Generated Greenhouse Gas Emissions

Construction Phase	Greenhouse Gas Emissions	
	CO ₂ (Pounds Per Day)	Total MtCO ₂ e
Site Clearing/Preparation	2,476.5	
Grading & Excavation	18,912.3	
Bridge Construction	11,250.1	
Paving	2,313.7	
Total:		2,490.9

Source: AMBIENT, 2014

Standard best management practices (BMP) would be incorporated into the Project, including, but not limited to, restrictions on idling, maintenance of construction equipment, and dust control. In addition, mitigation measures A-1 through A-1215 would be implemented during construction, which would reduce pollutant emissions from construction activities. Construction activities would be short-term, and with the implementation of mitigation measures A-1 through A-1215, Project construction would not be expected to result in a violation any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, impacts would be less than significant.

- b) **Less Than Significant Impact.** Greenhouse gas emissions in the State of California are regulated through Assembly Bill (AB) 32, which requires California's greenhouse gas emissions to be reduced to 1990 levels by 2020. As discussed above, operation of the Project would not result in an increased number of through lanes at the adjacent Higuera Street/Eastham Drive and Higuera Street/Jefferson Boulevard intersections, and would not

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increase capacity or result in additional cars on the Bridge; therefore, it would not result in the generation of new sources of greenhouse emissions.

Standard best management practices (BMP) would be incorporated into the Project, including, but not limited to, restrictions on idling, maintenance of construction equipment, and dust control. In addition, mitigation measures A-1 through A-1215 would be implemented during construction, which would reduce pollutant emissions from construction activities. Construction activities would be short-term, and with the implementation of mitigation measures A-1 through A-1215, Project construction would not be expected to result in a violation any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, impacts would be less than significant.

The Project was included in regional transportation plans and associated emissions analyses, including the FTIP and emissions analysis conducted by SCAG for the conforming 2012-2035 RTP/SCS. The Project would not conflict with any local or state policies for greenhouse gas emissions. Therefore, impacts would be less than significant.

Mitigation Measure(s): None Required

VIII. HAZARDS AND HAZARDOUS MATERIALS --Would the project:

a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

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Responses:

a) **Less Than Significant Impact.** Hazardous materials may be used during the construction of the Project, including petroleum-based products, paints, solvents, and sealers; however, the transport, use, or disposal of hazardous materials associated with Project construction would be conducted in compliance with City, County, state, and federal regulations. The Project would not result in a permanent increase in the routine transport, use, or disposal of hazardous materials. Current maintenance activities that involve the use of potentially hazardous materials, including replacement of street lighting, bridge and roadway painting, roadway sealing, and routine maintenance activities would continue as needed; however, the proposed improvements would not require additional maintenance; therefore, impacts would be less than significant.

b) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path. Structures built before 1978 have the potential to contain asbestos-containing materials and/or lead-based paint. Since the Bridge was constructed in 1937, there is potential for asbestos-containing material to be in Bridge joints and concrete piping, and potential for lead-based paint to be in the steel members and pavement markings. During Project construction, the existing steel girder would be demolished, which would require the removal of approximately 320 cubic yards of material that may contain lead-based paint.

During construction, hazardous materials may be used, including petroleum-based products, paints, solvents, and sealers; however, the transport, use, or disposal of these materials would be conducted in compliance with City, County, state, and federal regulations. During operation, the new Bridge would not result in the reasonably foreseeable release of hazardous materials into the environment. With adherence to existing construction standards and requirements, and the implementation of mitigation measures H-1 through H-2 listed below, there is a low risk that hazardous materials would be released into the environment, and impacts would be less than significant.

c) **Less Than Significant Impact.** There is one school within 0.25 mile of the Project area: The Willows Community School (approximately 0.13 mile northwest). The transport, use, or disposal of hazardous materials would be conducted in compliance with City, County, state, and federal regulations, and would not be conducted on school property. The Project would require the use of hazardous materials and substances within the Project area, such as road sealant and paint, which may emit odors. However, these materials are considered safe for outdoor use and in well-ventilated areas, and the odors would be expected to dissipate quickly after use and would not be expected to reach schools. Therefore, the use of these materials would not be expected to result in impacts on the schools.

Operation of the Project would not result in a permanent increase in the routine transport, use, or disposal of hazardous materials. Current maintenance activities that involve the use of potentially hazardous materials, including replacement of street lighting, bridge and roadway painting, roadway sealing, and routine maintenance activities would continue as needed; however, the proposed improvements would not require additional maintenance. Routine maintenance activities involving the use of potentially hazardous materials would be conducted in compliance with City, County, state, and federal regulations, and would not be conducted on school property. Therefore, impacts would be less than significant.

d) **Potentially Significant Impact Unless Mitigation Incorporated.** A minor amount of ROW would be required from adjacent properties to accommodate Bridge widening and utility relocations. ROW acquisition of approximately 791 square feet (0.02 acre) of private land adjacent to the Bridge would be required from two parcels to the south of the Bridge. Permanent easements of approximately 5,171 square feet (0.12 acre) of land would be required from three LACFCD parcels adjacent to the Bridge. An Initial Site Assessment (ISA) was completed for the Project in 2014 to identify historical or current storage, use, production, or disposal of hazardous or potentially hazardous materials within or near the Project area.

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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Two Recognized Environmental Conditions (REC) and two historical RECs were identified within 300 feet of the Project area that could potentially impact the Project area. As defined in the American Society for Testing and Materials (ASTM) E 1527-05 "Standard Practice for Environmental Site Assessments", an REC is "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property". There is reportedly lead-based paint within steel members of the existing Bridge, and there is a leaking sewer southeast of the Bridge that had documented fecal coliform impacts on groundwater below West Jefferson Boulevard. According to the Culver City Sewer Management Information System, the sewer line may have been partially or fully replaced.

5930 West Jefferson Boulevard (approximately 175 feet southeast of the Project area) is a historic volatile organic compound (VOC) site that has been remediated. 6000 West Jefferson Boulevard (approximately 280 feet south of the Project area) is a historic petroleum hydrocarbon site that has been remediated. The sites were closed under a human health risk scenario; because they are located in an industrial area, the cleanup goals are based upon health risk and low, non-actionable concentrations of residual contaminants could still exist in the soil and shallow groundwater. Because site-specific depth to groundwater and direction of groundwater flow is unknown in the Project area, mitigation measures will be implemented to account for this potential. With the implementation of mitigation measures H-1 through H-4 listed below, impacts would be less than significant.

- e) **No Impact.** The Project area is not located within an airport land use planning area or within two miles of a public airport or public use airport; therefore, there would be no impact.
- f) **No Impact.** The Project area is not located within the vicinity of a private airstrip; therefore, there would be no impact.
- g) **Less than Significant Impact.** During construction, demolition of the existing Bridge and construction of the new Bridge would require temporary detours and/or closures of Higuera Street in the Project area, although this would be minimized to the extent feasible. Optional routes to cross the Creek would be available, including National Boulevard and Duquesne Avenue, and a traffic management plan (TMP) identifying detour routes would be developed during final design. The TMP would outline all required detours and closures, and ensure access through the area. Coordination with the City's and the City of Los Angeles' emergency service providers would be conducted to ensure that emergency response and evacuation can be properly implemented during construction. Following construction, roadway access would be returned to existing conditions. Therefore, impacts would be less than significant.
- h) **No Impact.** Wildlands are undisturbed areas where vegetation and wildlife remain in their natural state. The Project area is in a developed, industrial/commercial area, and there are no wildlands within or near the Project area. Therefore, there would be no impact.

Mitigation Measure(s):

To mitigate impacts from hazardous materials, the following mitigation measures will be implemented during Project construction:

H-1 Lead and Asbestos Survey

A lead and asbestos survey will be completed by a licensed specialist prior to construction to determine if there are lead- and asbestos-containing materials in the Bridge structure. If none are found, no further action is required.

H-2 Proper Disposal

If found in the Bridge structure, lead- and asbestos-containing materials will be handled and disposed of in a manner approved by the California Division of Occupational Safety and Health (Cal-OSHA).

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H-3 Testing Prior to Dewatering

If dewatering is required during foundation construction, water will be tested and/or treated prior to discharge into the sanitary sewer.

H-4 Testing Prior to Soil Disposal

Spoils from foundation excavations will be tested to the satisfaction of the planned soil recipient prior to transportation or disposal.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

Responses:

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** Construction activities, including Bridge demolition and replacement, vegetation removal, grading, and equipment storage and fueling, would result in construction debris, wastes, loose soils, and fuels that could potentially enter the Creek. If these pollutants were

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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to enter the Creek, they could impact water quality in a manner that would violate existing standard discharge requirements. With the implementation of mitigation measures W-1 through W-8 listed below, impacts would be less than significant.

- b) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path; the Project would require some ground disturbance. Pile driving activities could extend 50 feet bgs; however, investigative borings were drilled to 81.5 feet, and groundwater was not encountered. The Project would not require the use of groundwater supplies or paving new areas that would interfere with groundwater recharge. In the unlikely event that groundwater is encountered, mitigation measure H-3 above would be implemented, and impacts would be less than significant.
- c) **Potentially Significant Impact Unless Mitigation Incorporated.** Construction activities associated with the Project would include demolishing and replacing the existing Bridge over the Creek and constructing a new ramp connection from Higuera Street to the Bike Path. During demolition and replacement of the Bridge, there is potential for construction debris and materials to fall into the channel below the Bridge, resulting in water quality impacts. A water diversion may be required for the Project, which would temporarily alter the course of the Creek, but would help prevent siltation and other water quality impacts. The Creek is a concrete-lined channel, and the Project would not require excavation or any work below the channel floor that would contribute to increased erosion.

Construction of the bike ramp connection would require vegetation removal and grading of the slope to allow paving of the bike ramp. This could result in increased erosion and polluted stormwater runoff that could enter the Creek and affect water quality. With the implementation of mitigation measures W-1 through W-8 listed below, impacts would be less than significant.

- d) **Less Than Significant Impact.** Implementation of the Project would result in an increase of approximately 0.19 acre of impervious surface area including the widened Bridge deck, sidewalk, and paved bike ramp connection. This would likely result in a slight increase in surface runoff; however, existing drainages in the area would accommodate the expected drainage flows from the roadway, Bike Path, and other flows passing through the area.

Four existing catch basins, located at each of the four corners of the Bridge, would be relocated to the new curb alignment, and modifications would be made to the horizontal pipes connecting to the existing storm drain system. The double-reinforced concrete box storm drain structure along the southeast side of Higuera Street would be protected in place. Deck drains would be considered as part of Bridge replacement, and they would drain directly into the Creek.

Although the Project would result in minor increased runoff flows, the existing hydrology would not be substantially altered and the chance of flooding would not be substantially increased. The storm drainage system would be designed to accommodate existing and anticipated runoff and would comply with regulatory requirements. The Project includes widening and replacing an existing Bridge and would not substantially alter the existing drainage pattern of the Project area or substantially increase the amount of surface runoff which would result in flooding on- or off-site. Therefore, impacts would be less than significant.

- e) **Less Than Significant Impact.** There are two storm drain outfalls at the southeast corner of the Project area, and one storm drain outfall at the southwest corner of the Project area above the Bike Path. Implementation of the Project would result in an increase of approximately 0.19 acre of impervious surface area including the widened Bridge deck, sidewalk, and paved bike ramp connection. The storm drainage system would be designed to accommodate existing and anticipated runoff and would comply with regulatory requirements. In addition, deck drains would be considered as part of the Bridge replacement, and they would drain directly into the Creek. The widened Bridge would not result in an increased traffic volume on the Bridge, and would not result in an increase

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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in pollutant runoff from vehicles. Therefore, impacts would be less than significant.

- f) **Potentially Significant Impact Unless Mitigation is Incorporated.** The Project would require temporary construction activities in the Creek, including a temporary water diversion. Installation and removal of the diversion could result in water quality impacts; however, with implementation of mitigation measures W-1 through W-8 listed below, impacts would be less than significant.
- g) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path, and would not include the construction of any housing. In addition, the Project would not result in changes to the floodplain that would place existing housing into a floodplain; therefore, there would be no impact.
- h) **No Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Map (Panel No. 06037C1595F) dated September 26, 2008, portions of the Project area are in Zone A (an area where no base flood elevation has been determined) and shaded Zone X (areas of 0.2 percent annual chance flood, or the 100-year flood zone), which is associated with the Creek (FEMA, 2008). The Creek is a concrete-lined floodway that mostly contains the 100-year flood; however, there are several areas that are mapped as Zones A and X. The Project would not involve changing or altering the channel floor and would not place structures in the channel that would impede or redirect flood flows. Use of a water diversion during construction would not impede flows. Therefore, there would be no impact.
- i) **Less Than Significant Impact.** According to the City's Natural Hazards Map, the Project area is in the Mulholland and Silverlake Dam Inundation Zones (City, 2007c). The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path and would not alter the existing drainage pattern of the Project area or increase risk of flooding from levee or dam failure. Therefore, impacts would be less than significant.
- j) **Less Than Significant Impact.** According to the City's Tsunami Map, the Project area is not in a tsunami risk zone (City, 2010b). In addition, the Project area is relatively flat with mostly concrete-paved surfaces; therefore, the area is not considered susceptible to mudflows. The Creek is a partially-enclosed water body, and the Project area may therefore be susceptible to seiches. However, the replacing and widening of the existing Bridge would not increase the likelihood or potential damage associated with inundation by seiche or tsunami. Therefore, impacts would be less than significant.

Mitigation Measure(s):

To mitigate impacts on water quality, the following mitigation measures shall be included in the Project Specifications and shall be implemented during Project construction:

W-1 Reduced Work Areas

Work areas shall be reduced per the City Engineer's direction to avoid the Creek and minimize impacts on jurisdictional areas. Reduction in work area will reduce the probability of pollution entering the Creek and/or being carried off site.

W-2 Staging Areas Outside the Channel

Staging of construction trucks, equipment, and materials, shall be outside the channel in an area approved by the City Engineer to reduce direct and indirect impacts on the Creek. All Creek inlet structures such as catch basins shall be protected to prohibit construction debris from entering the Creek.

W-3 Debris Containment

Measures shall be implemented during construction to minimize the potential for concrete dust, debris, paint chips, rust, and construction materials to fall into the channel, or otherwise leave the construction area. Possible methods to prevent materials from falling into the channel include tenting or constructing a debris-catching platform below the

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Bridge. The contractor shall be required to submit a "Debris Containment Plan" for review and approval by the City Engineer.

W-4 No Work in Flowing Water

Equipment traveling in the Creek shall be restricted to the dry side of the channel and shall not be allowed to enter the wetted portion of the Creek, or anywhere there is flowing water.

W-5 Daily Equipment Checks

All equipment used in the Creek will be checked daily for fluid leaks. Any equipment found to be leaking fluids shall not be allowed to enter the Creek. Drip pans will be placed beneath all construction equipment when not in use.

W-6 Equipment Maintenance

All equipment refueling and maintenance will be conducted outside the Creek in the staging area per standard specifications and the approved Stormwater Pollution Prevention Plan (SWPPP). In addition, BMPs will be implemented during construction to reduce potential impacts associated with leaks and spills of oil, fuel, or machinery fluids.

W-7 Trash and Construction Debris Removal

All trash and construction debris shall be removed from the channel and construction areas on a daily basis and as needed. All BMPs will be properly maintained during Project construction, and removed upon completion of construction activities. After completion of the Project, all construction equipment, materials, and scaffolding will be removed from the Project area.

W-8 Stormwater Pollution Prevention Plan

The contractor will be required by the City to prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) to include special measures to mitigate potential construction impacts to the Creek and shall be reviewed and approved by City staff prior to construction.

X. LAND USE AND PLANNING - Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established community? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | ☐ | ☐ | ☐ | ☒ |

Responses:

- a) **Less Than Significant Impact.** The Project would include replacing and widening the existing Bridge to improve circulation and safety, and constructing a new connection to the existing Bike Path along the Creek; therefore, implementation of the Project would not be expected to divide the existing community. During construction, there could be temporary disruptions to circulation in the area due to traffic delays/detours; however, a traffic management plan (TMP) would be implemented to minimize these impacts. Therefore, impacts would be less than significant.
- b) **No Impact.** The Project is consistent with the goals and policies outlined in the Circulation Element of the City's General Plan, which designates Higuera Street as a 4-lane roadway (City, 1995). Construction and operation of

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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the Project would be conducted in compliance with the plans and goals adopted by the City, and the Project would improve circulation and bicycle/pedestrian safety through the area. Therefore, there would be no impact.

- c) **No Impact.** There are no habitat conservation plans or natural community conservation plans that are applicable to the Project area; therefore, there would be no impact.

Mitigation Measure(s): None Required

XI. MINERAL RESOURCES -- Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☒ |

Responses:

- a) **No Impact.** The State Mining and Reclamation Act of 1975 (SMARA) requires mineral resources within California to be mapped. The State Mining and Geology Board (SMGB) designates Mineral Resource Zones (MRZ), areas in which minerals have been found in substantial quantities, and regulates mining within these zones. MRZ-2 designates areas where there are, or there is likely to be, mineral deposits. According to the County, there are no oil fields or MRZ-2 areas within or adjacent to the Project area (County, 2012). Therefore, there would be no impact.
- b) **No Impact.** According to the City's General Plan Conservation Element, there are no locations within the City of rock, sand, or gravel resources (City, 1973). Therefore, there would be no impact.

Mitigation Measure(s): None Required

XII. NOISE --Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

EVALUATION OF ENVIRONMENTAL IMPACTS:

	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Responses:

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** A Noise Technical Memorandum prepared for the Project in 2013 and conducted short- and long-term measurements to determine the existing noise levels in the Project area (ABMIENT, 2013). Short-term monitoring was conducted near the southwest corner of the Bridge at 8450 Higuera Street; the measured noise levels were between 62 and 66 dBA Leq between the approximate hours of 2 p.m. and 7 p.m. Long-term monitoring was conducted near the southwest corner of the Bridge at 8450 Higuera Street; measured noise levels were between 53 and 67 dBA Leq within a 24-hour period.

A logarithmic scale is used to describe sound pressure level in terms of decibels (dB). The increased sensitivity of the human ear to certain frequencies is approximated by skewing or weighing the dB scale towards those frequencies. The weighted dB scale which best approximates the response of the human ear is known as the A-weighted scale (dBA) and all sound levels in this section are reported in terms of dBA.

In traffic noise analysis, the equivalent sound level (Leq) represents an average of the sound energy occurring over a specified period. The 1-hour-A-weighted equivalent sound (Leq(h)) is the energy average of A-weighted sound levels occurring during a one-hour period and is the basis for noise abatement criteria used by Caltrans and FHWA, as described below.

Land uses in the Project area consist predominantly of a mix of open space, commercial, and industrial uses. The nearest residential land uses are located approximately 600 feet east of the Project area, adjacent to and south of Higuera Street. In addition, the Willows Community School is located approximately 350 feet west of the Project area, between Higuera Street and Warner Drive.

No noise-sensitive land uses (e.g., residential dwellings, churches, libraries, schools, etc.) or outdoor areas of frequent human long-term exposure were identified in the Project area that could potentially be exposed to traffic noise impacts resulting from the Project. Therefore, operation of the Project would not result in noise impacts to noise-sensitive receptors.

During construction, noise from construction activities may intermittently provide increased noise levels in and near the Project area. **Table 5** summarizes noise levels produced by construction equipment that are commonly used on roadway construction projects. Construction equipment is expected to generate noise levels ranging from 70 to 90 dBA L_{max} at a distance of 50 feet and 65 to 78 dBA L_{max} at a distance of 200 feet. Noise produced by construction equipment generally decreases at a rate of approximately six dB per doubling of distance from the source.

Table 5: Construction Equipment Noise

Equipment	Noise Level (dBA L_{max} at 50 feet)	Noise Level (dBA L_{max} at 200 feet)
Bulldozers	82	70
Heavy Trucks	81	69
Backhoe	78	66
Pneumatic Tools	85	73
Concrete Pump	81	69
Loader	79	67
Roller	80	68
Compressor	78	66
Crane	81	69
Drill Rig	79	67
Paver	77	65

EVALUATION OF ENVIRONMENTAL IMPACTS:

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Hoe Ram	90	78
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Source: Federal Highway Administration 2008.

Construction of the new bridge and bike ramp connection would be short-term and intermittent and would be conducted in accordance with local noise regulations. With the implementation of mitigation measures N-1 through N-5 listed below, impacts would be less than significant.

- b) **Less than Significant Impact.** There are no federal, state, or local regulatory standards for groundborne vibration; however, Caltrans has developed vibration criteria based on potential structural damage risks and human annoyance, and these criteria have been used to support this discussion. Caltrans-recommended criteria for the evaluation of groundborne vibration levels, with regard to structural damage and human annoyance, are summarized in **Table 6**. The criteria apply to continuous vibration sources, which include vehicle traffic, train, and most construction vibrations, with the exception of transient or intermittent construction activities, such as pile driving. All damage criteria for buildings are in terms of ground motion at the buildings' foundations.

Table 6: Summary of Groundborne Vibration Levels and Potential Effects

Vibration Level (in/sec ppv)	Human Reaction	Effect on Buildings
0.006-0.019	Threshold of perception; possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibrations begin to annoy people	Virtually no risk of "architectural" damage to normal buildings
0.20	Vibrations annoying to people in buildings (this agrees with the levels established for people standing on bridges and subjected to relative short periods of vibrations)	Threshold at which there is a risk of "architectural" damage to normal dwelling - houses with plastered walls and ceilings. Special types of finish such as lining of walls, flexible ceiling treatment, etc., would minimize "architectural" damage
0.4-0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause "architectural" damage and possibly minor structural damage.
The vibration levels are based on peak particle velocity in the vertical direction for continuous vibration sources, which includes most construction activities, with the exception of transient or intermittent construction activities, such as pile driving. For pile driving, the minimum criterion level is typically considered to be 0.2 in/sec peak particle velocity (ppv). No allowance is included for the amplifying effects of structural components and characteristics of buildings. Source: Caltrans, 2002		

As shown in **Table 6**, the "architectural damage risk level" for continuous vibrations is a peak particle velocity (ppv) of 0.2 inches per second (in/sec). This same level corresponds to the level at which vibrations typically become annoying to people in buildings. The minimum threshold at which continuous vibrations begin to annoy people is 0.1 in/sec ppv. Caltrans recommends an upper threshold level of 0.08 in/sec for continuous vibrations to "ruins and ancient monuments." For continuous vibration exposure, this criterion level is often applied to historical buildings, or buildings that are in poor condition. For pile driving, the minimum criterion level is typically considered 0.2 in/sec ppv (Caltrans, 2002).

According to studies conducted by Caltrans, trucks generate the highest levels of traffic vibration. Truck-generated vibrations, at 16 feet from the centerline of the nearest travel-lane, typically do not exceed 0.08 in/sec ppv (Caltrans, 2002, 2004). Because most of the properties adjacent to the Bridge and roadway are more than 16 feet from the centerline, and because the Project would not result in additional vehicles on the roadway and would not introduce motorized vehicle transportation to the Bike Path, operation of the Project would not be expected to result in increases in groundborne vibration levels at nearby receivers that would

EVALUATION OF ENVIRONMENTAL IMPACTS:

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exceed Caltrans criteria.

During construction, activities may intermittently provide increased groundborne vibration in and near the Project area. Groundborne vibration levels commonly associated with bridge and bike ramp construction equipment are summarized in **Table 7**. Construction of the new ramp connection could require use of small bulldozers or cement trucks, which could generate groundborne vibration levels of .089 in/sec ppv. By comparison, the minimum threshold at which continuous vibrations begin to annoy people is 0.1 in/sec ppv.

The highest groundborne vibration levels are typically generated by pile drivers and vibratory rollers. Construction-related groundborne vibration for the Project would be associated primarily with the installation of bridge support piles. To minimize groundborne vibration impacts on nearby properties, 24-inch CIDH piles would be placed between the existing steel piles to construct the new Bridge. Impact driving would not be required for CIDH piles and would substantially reduce vibration. The use of other equipment, such as vibratory rollers, which would result in higher levels of vibration, is not anticipated; therefore, construction-generated groundborne vibration levels at the nearest existing structures would not be anticipated to exceed Caltrans criteria, and impacts would be less than significant.

Table 7: Representative Vibration Levels for Construction Equipment

Equipment		Peak Particle Velocity at 25 Feet (in/sec)
Pile Driver (Impact)	Upper Range	1.518
	Typical	0.644
Pile Driver (Sonic)	Upper Range	0.734
	Typical	0.170
Vibratory Roller		0.210
Hoe Ram		0.089
Caisson Drill		0.089
Large Bulldozers		0.089
Loaded Trucks		0.076
Jackhammer		0.035
Small Bulldozers		0.003
Source: FTA 2006, Caltrans 2004		

- c) **Less than Significant Impact.** The Project would include minor changes to the horizontal alignment (widening) and would add an additional travel lane on the Bridge. However, this alignment change would be minimal and the Project would not increase the number of through lanes on Higuera Street. As described in response a), the nearest noise-sensitive receptors are approximately 350 feet from the Project area. No noise-sensitive land uses (e.g., residential dwellings, churches, libraries, schools, etc.) or outdoor areas were identified in the Project area that would be exposed to operational noise impacts resulting from the Project. Therefore, impacts would be less than significant.
- d) **Less than Significant Impact.** As discussed in response a), construction activities would result in temporary and intermittent noise levels increases in and near the Project area. Construction equipment is expected to generate noise levels ranging from 70 to 90 dBA Lmax at a distance of 50 feet and 65 to 78 dBA Lmax at a distance of 200 feet. Construction would be short-term and intermittent and would be conducted in accordance

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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with local noise regulations. With adherence to local regulations and implementation of mitigation measures N-1 through N-5 listed below, impacts would be less than significant.

- e) **No Impact.** The Project area is not located within an airport land use plan or within two miles of public airport or public use airport; therefore, there would be no impact.
- f) **No Impact.** The Project area is not located near a private airstrip; therefore, there would be no impact.

Mitigation Measure(s):

To mitigate noise impacts, the following mitigation measures will be implemented during Project construction.

N-1 Hours of Construction

Where feasible, construction will be scheduled during daytime hours to minimize disturbance to nearby noise-sensitive land uses. In accordance with City noise regulations, construction hours will generally be limited to the hours of 8:00 a.m. to 8:00 p.m., Monday through Friday; between the hours of 9:00 a.m. to 7:00 p.m. on Saturdays, and between the hours of 10:00 a.m. to 7:00 p.m. on Sundays. Limited nighttime construction may be required to avoid substantial traffic disruption or public safety concerns. This work would be contingent upon approval from the City, and the City of Los Angeles and would be consistent with Caltrans Standard Specifications. Dirt hauling shall only occur between 9:00 am and 3:00 pm.

N-2 Equipment Tuning and Use of Mufflers

All equipment will have sound-control devices as effective as those provided on the original equipment. All equipment will have a muffled exhaust.

N-3 Standard Specifications: Noise Control

If nighttime work is required, per Caltrans' Standard Specifications Section 14-8.02 "Noise Control" noise levels would not exceed 86 dBA Lmax at 50 feet from the job site activities from 9 p.m. to 6 a.m.

N-4 Standard Specifications: Use of Mufflers

Per Caltrans' Standard Specifications Section 14-8.02 "Noise Control" each internal combustion engine used for any purpose on the job, or related to the job, shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated on the job site without an appropriate muffler.

N-5 Standard Specifications: Noise Abatement Measures

Per Caltrans' Standard Specifications Section 14-8.02, "Noise Control," the contractor would, as directed by the Caltrans' resident engineer, implement appropriate additional noise abatement measures including, but not limited to, changing the location of stationary construction equipment, turning off idling equipment, rescheduling construction activity, notifying adjacent residents in advance of construction work, or installing acoustic barriers around stationary construction noise sources.

XIII. POPULATION AND HOUSING -- Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

EVALUATION OF ENVIRONMENTAL IMPACTS:

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Responses:

- a) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path, and would not include new homes or businesses or extension of roadway facilities that could indirectly result in growth. Therefore, the Project would not induce population growth in the area, and there would be no impact.
- b) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path and would not displace housing; therefore, there would be no impact.
- c) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path and would not displace people; therefore, there would be no impact.

Mitigation Measure(s): None Required

XIV. PUBLIC SERVICES

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

Fire protection?

☐
☐
☐
☒

Police protection?

☐
☐
☐
☒

Schools?

☐
☐
☐
☒

Parks?

☐
☐
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☒

Other public facilities?

☐
☐
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Responses:

- a) **No Impact.** The Project would include replacing and widening the existing Bridge to improve circulation and safety, and constructing a new ramp connection from Higuera Street to the Bike Path, and would not include new homes or businesses or extension of roadway facilities that could indirectly result in growth. Because the Bike Path is an existing multi-use bike path with roadway connections at National Boulevard and Duquesne Avenue, the new ramp connection would not be associated with the provision of new facilities requiring public services. Therefore, the Project would not result in the need for additional fire protection services, police protection services, schools, parks, or other public facilities or governmental services, and there would be no impact.

Mitigation Measure(s): None Required

XV. RECREATION --

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

☐
☐
☒
☐

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

☐
☐
☒
☐

Responses:

- a) **Less Than Significant Impact.** The project would include replacing and widening of the existing bridge, which would not result in an increased use of existing neighborhood and regional parks, or other recreational facilities.

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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The Bike Path runs along the western bank of the Creek and crosses under the Bridge. Although the Bridge is designated in the City's Bicycle and Pedestrian Master Plan as an access point to the Bike Path (City, 2010a), the existing Bridge has neither a pedestrian nor bicycle connection to the Bike Path; the nearest access points are at National Boulevard (approximately 0.4 mile to the north) and Duquesne Avenue (approximately 0.7 mile to the southwest). The Project would include constructing a new ramp connection from Higuera Street to the existing Bike Path.

The new ramp connection may result in increased use of the Bike Path; however, the new ramp connection is a planned element included in the City's Bicycle and Pedestrian Master Plan to enhance access to the Bike Path, and this increased use is not expected to result in substantial deterioration of the facility. Therefore, impacts would be less than significant.

- b) **Less Than Significant Impact.** The Project would include constructing a new ramp connection from Higuera Street to the existing Bike Path. The new ramp connection would be constructed primarily in areas that are already paved or where there is disturbed vegetation; therefore, it is not expected to result in substantial adverse physical effects on the environment, and impacts would be less than significant.

Mitigation Measure(s): None Required

XVI. TRANSPORTATION/TRAFFIC -- Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Would the project result in inadequate parking capacity?	☐	☐	☐	☒
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Responses:

- a) **No Impact.** The Project would include widening and replacing the existing Bridge to improve circulation and safety and add bike lanes on both sides of the Bridge, and constructing a new bike ramp connection to the existing Bike Path along the Creek. The Project would be consistent with the City's General Plan Circulation Element, which includes the following policies:

EVALUATION OF ENVIRONMENTAL IMPACTS:

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Policy 1.A: Facilitate movement of vehicles at intersections and along roadway links by increasing capacity, improving operation, and reducing volumes as appropriate and feasible.

Policy 1.E: Improve traffic flow in areas of high traffic volume by assigning high priority to roadway improvements, transit links, and bikeways which serve these areas.

Policy 3.B: Expand the bicycle system to include loops which connect the Ballona Creek Bicycle Path to activity centers in the City.

Policy 3.C: Expand the bicycle system to include linear routes which connect to routes in adjacent jurisdictions and which traverse the City.

In addition, Higuera Street is designated in the City's General Plan Circulation Element as a 4-lane roadway. Therefore, the Project would ensure that the Bridge is consistent with this designation and would remove the existing bottleneck at the Bridge.

The Project would also be consistent with the City's Bicycle and Pedestrian Master Plan, which designates the Bridge as an access point to the Bike Path (City, 2010a). The existing Bridge has neither a pedestrian nor bicycle connection to the Bike Path; the nearest access points are at National Boulevard (approximately 0.4 mile to the north) and Duquesne Avenue (approximately 0.7 mile to the southwest). The new bike ramp connection would provide the access point as called for in the Bicycle and Pedestrian Master Plan.

The City's Bicycle and Pedestrian Master Plan also designates Higuera Street as a Proposed Bicycle Friendly Street between Washington Boulevard and Jefferson Boulevard (City, 2010a). As a Bicycle Friendly Street, Higuera Street would act as an important connector between the highly-traveled Washington Boulevard and Jefferson Boulevard arterials, the Bike Path, and the Expo Light Rail Transit Station. The proposed bike lanes on both sides of the Bridge and the new ramp connection would promote the use of Higuera Street as a Bicycle Friendly Street.

A traffic analysis was completed for the Project to determine impacts on the level of service (LOS) at four intersections near the Project area: Higuera Street/Hayden Avenue, Higuera Street/Jefferson Boulevard, Higuera Street/Eastham Drive, and Rodeo Road/La Cienega Boulevard (Minagar, 2014). All of the intersections, except the Higuera Street/Eastham Drive intersection, would continue to operate at their Existing (Year 2014) Pre-Project LOS in the morning (AM) peak hour (7:40 AM to 8:40 AM) and afternoon (PM) peak hour (4:40 PM to 5:40 PM) during the typical weekday for Existing (Year 2014) Plus Project conditions. When compared to Existing (Year 2014) Pre-Project conditions, LOS at the Higuera Street/Eastham Drive intersection would improve from LOS F to LOS A in the AM peak hour, and from LOS D to LOS C in the PM peak hour.

Under the Future (Horizon Year 2035) Plus Project conditions, all of the intersections except the Higuera Street/Eastham Drive intersection would continue to operate at their Existing (Year 2014) Pre-Project conditions. The Higuera Street/Eastham Drive intersection would improve from LOS F to LOS A in the AM peak hour, when compared to Existing (Year 2014) Pre-Project conditions. Therefore, the Project would not result in a decrease in LOS at any of the study intersections. In addition, the Project would not generate any new AM or PM peak hour trips or new daily trips.

During Project construction, temporary detours and/or closures of Higuera Street would be required in the Project area, although this would be minimized to the extent feasible. However, optional routes to cross the Creek would be available, including National Boulevard and Duquesne Avenue. A traffic management plan (TMP) identifying detour routes would be developed during final design. The TMP would outline all required detours and closures, and would ensure access through the area. Following construction, roadway access would be returned to existing conditions.

Access to the portion of the Bike Path underneath the Bridge would be maintained throughout most of the construction period, and scaffolding underneath the Bridge would provide bicyclists and pedestrians with a

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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protected north-south passage. However, during certain activities, this portion of the path would be closed temporarily for safety purposes. During closures, bicyclists and pedestrians would not be able to pass under the Bridge, and would need to enter/exit the Bike Path via National Boulevard or Duquesne Avenue.

Bicyclists requiring an alternate north-south route during these closures would be able to use city streets; pedestrians requiring an alternate north-south route during these closures would be able to use city sidewalks. Following Project construction, the path would be fully accessible in its original configuration and the new ramp connection to and from the Bike Path would be available at Higuera Street for bicyclists and pedestrians to use.

The duration of the Higuera Street and Bike Path closures would be short-term, and access would be restored to existing or improved conditions following completion of the Project. The Project is intended to improve the safety and performance of the roadway, enhance bicycle facilities, and maintain pedestrian access across the Bridge. Therefore, the Project would not conflict with applicable plans, ordinances, or policies, and there would be no impact.

- b) **No Impact.** The Project would not conflict with the existing Los Angeles County Metropolitan Transit Authority (Metro) Congestion Management Program (CMP), which requires that intersections monitored by the program be analyzed under Metro's CMP criteria if a Project is expected to generate 50 or more peak hour trips on a CMP-designated facility. Based on the traffic analysis, the Project would not generate any peak hour trips on CMP-designated facilities. Therefore, there would be no impact.
- c) **No Impact.** The Project would not affect the levels or location of air traffic because the Project area is approximately five miles east of the nearest airport, the Santa Monica Municipal Airport, and is not within an airport land use planning area. The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path and would not involve the construction of any airport-related structures. In addition, the Project would not include vertical structures or features resulting in glare that could affect airplanes that may be flying above the Project area. Therefore, there would be no impact.
- d) **Less Than Significant Impact.** The Project would include widening the Bridge to be consistent with adjacent roadway segments, which would be expected to improve roadway operations. The Project would not include design features such as sharp curves or dangerous intersections that would increase hazards in the Project area. Bridge widening would also result in realignment of vehicle lanes closer to adjacent properties; however, the widened Bridge and approaches would be compatible with adjacent land uses, and the new ramp connection would enhance bicycle and pedestrian access in the area; therefore, the Project would not result in hazardous design elements or incompatible uses, and impacts would be less than significant.
- e) **Less Than Significant Impact.** Demolition of the existing Bridge and construction of the new Bridge would require temporary detours and/or closures of Higuera Street in the Project area, although this would be minimized to the extent feasible. Optional routes over the Creek would be available, including National Boulevard and Duquesne Avenue. A TMP identifying detour routes would be developed during final design. The TMP would outline all required detours and closures and would ensure that emergency access is maintained through the area. Construction activities would also be coordinated with emergency service providers to avoid disruption of emergency access. Following construction, the roadway would be restored to existing conditions, and long-term emergency access would not be affected. Therefore, impacts would be less than significant.
- f) **No Impact.** Parking is currently not permitted on the Bridge or Bridge approaches, and the Project would not affect any existing parking in the Project area. Therefore, there would be no impact.
- g) **Less Than Significant Impact.** The City's General Plan includes goals and policies for improving bikeway connectivity to downtown from the Bike Path and providing convenient and pleasant pedestrian access. In addition, the City's Bicycle and Pedestrian Master Plan describes the need for bike access from Higuera Street to the Bike Path. The Project would include bike lanes on both sides of the Bridge, provide a new bike ramp

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connection from Higuera Street to the Bike Path, and maintain pedestrian access across the Bridge. As described in response a), Higuera Street and the Bike Path would be temporarily closed during construction, but access would be restored to existing or improved conditions following completion of the Project. The Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, impacts would be less than significant.

Mitigation Measure(s): None Required.

XVII. UTILITIES AND SERVICE SYSTEMS --Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Responses:

- a) **No Impact.** The Project would include replacing and widening the existing Bridge and constructing a new ramp connection from Higuera Street to the Bike Path. The Project would not include elements that would generate wastewater or exceed the wastewater treatment requirements of the Los Angeles RWQCB. Therefore, there would be no impact.
- b) **No Impact.** There are several utilities within the existing Bridge structure, including a Golden State Water Company water main. The existing utilities would be replaced and incorporated into the new Bridge structure. The Project would not include elements that would generate additional water or wastewater needs that would require the construction of new or expanded water or wastewater treatment facilities. Therefore, there would be no impact.
- c) **Less Than Significant Impact.** An existing storm drain south of the Bridge would be protected in place during construction and would remain after Project implementation. The Project would result in an increase of approximately 0.19 acre of impervious surface area including the widened Bridge deck, sidewalk, and paved bike ramp connection. This could result in a slight increase in surface runoff; however, existing drainages in the area would be designed to accommodate the expected drainage from the roadway, Bike Path, and other existing

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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drainage flows. Therefore, the Project would not require the construction or expansion of storm water drainage facilities, and impacts would be a less than significant impact.

- d) **Less Than Significant Impact.** Vegetation removal would be required to accommodate the widened Bridge and new Bike Path connection. The Project would include landscaping that would require irrigation; however, existing water supplies are expected to be sufficient to support the landscaping, and would not require new or expanded entitlements for water supplies. Therefore, impacts would be less than significant.
- e) **No Impact.** The Project would not generate wastewater that would require wastewater treatment providers. Therefore, there would be no impact.
- f) **Less than Significant Impact.** Project construction would generate approximately 3,000 cubic yards of solid waste, which would be accommodated by an existing landfill. Operation of the Project would not result in an increase in solid waste production; therefore, impacts would be less than significant.
- g) **No Impact.** The Project would comply with federal, state, and local statutes and regulations related to solid waste, which would be accommodated by a local landfill; therefore, there would be no impact.

Mitigation Measure(s): None Required

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE –

- | | | | | |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | ☐ | ☒ | ☐ | ☐ |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ |

Responses:

- a) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project area provides minimal habitat for fish or wildlife species and does not contain sensitive natural communities. No special-status fish or wildlife species were observed during field surveys. With the implementation of standard BMPs, compliance with regulatory permits, and implementation of mitigation measures (see the Mitigation Monitoring Program at the end of this Initial Study Checklist), construction of the Project would not result in adverse impacts on biological resources, and impacts would be less than significant.
- b) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project could contribute to cumulative impacts if Project construction takes place at the same time as the construction of other projects that are proposed near the Project. Because the Project is small in scale, the cumulative impact area has been identified as a 1-mile radius from the Bridge. According to the City, future capital improvement projects for 2013/2014 in

EVALUATION OF ENVIRONMENTAL IMPACTS:

Potentially
Significant
Impact

Potentially
Significant
Impact Unless
Mitigation
Incorporated

Less Than
Significant
Impact

No
Impact

this cumulative impact area include:

- Americans with Disabilities Act accessibility and a drinking fountain at a skatepark;
- A residential street overlay;
- Safe Routes to School modifications;
- Pedestrian improvements at eight intersections with bus stops; and
- Traffic signal installation at Washington Boulevard and Cattaraugus Avenue (City, 2013).

None of these projects are directly adjacent to the Project. As described in this Initial Study, the Project does not have any individually significant impacts that cannot be mitigated to a less than significant level. With the implementation of standard BMPs; compliance with local, state, and federal regulations; and implementation of mitigation measures (see the Mitigation Monitoring Program at the end of this Initial Study Checklist), Project impacts would be less than significant. Current and future projects in the cumulative impact area would be expected to implement similar measures. Therefore, when viewed in connection with other planned projects, the Project's contribution to cumulative impacts would be less than cumulatively considerable and less than significant.

- c) **Potentially Significant Impact Unless Mitigation Incorporated.** The Project would include widening and replacing the existing Bridge to improve circulation and safety, and constructing a new connection to the existing Bike Path along the Creek. Implementation of the Project could result in impacts on humans from air quality or the potentially hazardous materials. With the implementation of standard BMPs, compliance with regulatory permits, and implementation of mitigation measures (see the Mitigation Monitoring Program at the end of this Initial Study Checklist), neither construction nor operation of the Project would result in substantial adverse impacts on human beings, either directly or indirectly, and impacts would be less than significant.

Mitigation Measure(s):

Mitigation measures have been outlined in previous sections of this Initial Study and are summarized in the Mitigation Monitoring Program at the end of this Initial Study Checklist.

MITIGATION MONITORING PROGRAM

The following environmental mitigation measures shall be incorporated into the Project development as conditions of approval. The Project applicant shall secure a signed verification for each of the mitigation measures which indicates that mitigation measures have been complied with and implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.) Final clearance shall require all applicable verification as included in the following table. The City would have primary responsibility for monitoring and reporting the implementation of the mitigation measures unless otherwise indicated. The mitigation measures have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
A-1 Water or Dust Palliative Water or dust palliative will be applied to the Project area and equipment as frequently as necessary to control fugitive dust emissions. Fugitive emissions generally must meet a “no visible dust” criterion either at the point of emission or at the right of way line depending on local regulations.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-2 Soil Binder Soil binder will be spread on any unpaved roads used for construction purposes, and all Project construction parking areas.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-3 Truck Washing Trucks will be washed off as they leave the right of way as necessary to control fugitive dust emissions.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-4 Dust Control Plan A dust control plan will be developed to document sprinkling, temporary paving, speed limits, and expedited revegetation of disturbed slopes as needed to minimize fugitive dust emissions.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
A-5 Location of Equipment and Materials Storage Sites Equipment and materials storage sites will be located as far away from residential and/or public space areas as practical, and construction areas will be kept clean and orderly.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-6 Track-Out Reduction Measures Track-out reduction measures, such as gravel pads, will be used at Project access points to minimize dust and mud deposits on roads affected by construction traffic.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-7 Covering and Wetting of Transported Soils and Adequate Freeboard All transported loads of soils will be covered and materials will be wetted prior to transport, or adequate freeboard (space from the top of the material to the top of the truck) will be provided to minimize emissions of dust (particulate matter) during transportation.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-8 Removal of Dust and Mud on Roads Dust and mud that are deposited on paved, public roads from construction activity and traffic will be promptly and regularly removed to decrease particulate matter.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-9 Mulch or Plant Vegetation Mulch or plant vegetation will be installed as soon as practical after grading to reduce windblown particulate in the area. Certain methods of mulch placement, such as straw blowing, may themselves cause dust and visible emission issues and may need controls such as dampened straw.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
A-10 Equipment and Vehicle Maintenance Construction equipment and vehicles will be properly tuned and maintained. Low-sulfur fuel will be used in all construction equipment as provided in California Code of Regulations Title 17, Section 93114.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-11 Construction Traffic Routing and Scheduling Construction traffic will be routed and scheduled to avoid peak travel times as much as possible, to reduce congestion and related air quality impacts caused by idling vehicles along local roads.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-12 Sensitive Receptor Buffer Extended idling (i.e., no more than five consecutive minutes) of heavy-duty diesel-powered construction equipment within 500 feet of nearby sensitive receptors (i.e., Willows Community School) will be prohibited during periods when the equipment is not in use.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
A-13 Public Concerns Regarding Dust Control <u>The dust control plan shall identify a designated person to receive phone calls regarding concerns related to fugitive dust emissions and/or compliance with identified fugitive dust control measures. The designated person may include a member of City staff. The name and telephone number of the designated person shall be provided to the City prior to the start of any grading, earthwork, or demolition.</u>	<u>Incorporation of measure into plans and specifications/ Implementation of measure during construction</u>	<u>Plans and specifications check/ Construction monitoring</u>	<u>Final design/ Construction</u>	<u>City's Public Works Department</u>

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>A-14 Public Notification</u> Signs shall be posted at the Project area entrance and written notifications shall be provided a minimum of 30 days prior to initiation of project construction to residential properties and businesses located within 300 feet of the Project area. The signs and written notifications shall include the following information: (a) Project Name; (b) Anticipated construction schedule(s); and (c) Telephone number(s) of the designated person.	<u>Incorporation of measure into plans and specifications/ Implementation of measure during construction</u>	<u>Plans and specifications check/ Construction monitoring</u>	<u>Final design/ Construction</u>	<u>City's Public Works Department</u>
<u>A-15 Documentation and Notification of Dust Control Concerns</u> The designated person will document and immediately notify the City's Public Works Department of any air quality complaints received. If necessary, the applicant and/or contractor will coordinate with the City's Public Works Department to identify any additional feasible measures and/or strategies to be implemented to address public complaints.	<u>Incorporation of measure into plans and specifications/ Implementation of measure during construction</u>	<u>Plans and specifications check/ Construction monitoring</u>	<u>Final design/ Construction</u>	<u>City's Public Works Department</u>
<u>B-1 Reduced Work Area</u> Construction areas would be reduced to the maximum extent feasible to avoid impacts on migratory birds and raptors and minimize impacts on jurisdictional areas.	<u>Incorporation of measure into plans and specifications/ Implementation of measure during construction</u>	<u>Plans and specifications check/ Construction monitoring</u>	<u>Final design/ Construction</u>	<u>City's Public Works Department</u>
<u>B-2 Work Performed Outside of the Nesting Season</u> Construction activities within 300 feet of potential nesting areas (500 feet for potential raptor nests) would be scheduled outside of the nesting bird season (the nesting period is typically February 15 to September 15) to the extent feasible. Vegetation trimming for the Project would be minimized and would be performed outside of the nesting season to the extent feasible.	<u>Construction scheduling to avoid nesting season/ Vegetation removal according to measure</u>	<u>Final construction schedule check/ Plan check to confirm vegetation removal areas/ Monitoring of vegetation removal</u>	<u>Prior to final design/ Final Design/ Construction</u>	<u>City's Public Works Department</u>

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
B-3 Nesting Bird Surveys If construction is scheduled during bird nesting season, nesting bird surveys would be completed no more than 48 hours prior to construction to determine if nesting birds, raptors, or active nests are on the Bridge, beneath the Bridge, or within 500 feet of the construction area. Surveys would be repeated if construction activities are suspended for five days or more.	Incorporation of measure into plans and specifications/ Pre-construction surveys	Plans and specifications check/ Surveys by qualified biologist	Final Design/ Pre-construction, no more than 48 hours prior to construction	City's Public Works Department
B-4 Vegetation Clearing If vegetation trimming or clearing needs to be conducted during the nesting season, nesting bird surveys would be completed by a qualified biologist no more than 48 hours prior to trimming or clearing activities to determine if nesting birds are within the affected vegetation. Surveys would be repeated if trimming or removal activities are suspended for five days or more.	Incorporation of measure into plans and specifications/ Surveys prior to vegetation removal	Plans and specifications check/ Surveys by qualified biologist	Final Design/ Pre-construction, no more than 48 hours prior to vegetation removal	City's Public Works Department
B-5 Nesting Bird Buffer If nesting birds are found in the Project area, appropriate buffer areas (typically 300 feet for birds and up to 500 feet for raptors) would be implemented, in coordination with the appropriate resource agencies, to ensure that nesting birds and active nests are not harmed.	Incorporation of measure into plans and specifications/ Consultation with resource agencies/ Implementation of buffers	Plans and specifications check/ Record of communication/ Construction monitoring	Final Design/ As applicable/ As applicable during construction	City's Public Works Department
B-6 Bat Surveys Outside of the breeding and torpor seasons (typically late fall in October-November), the Bridge structure would be thoroughly surveyed for bats by a qualified biologist with bat experience to identify any active or potential bat-roosting cavities. If any bats are found roosting in the Bridge, they would be safely excluded under the direction of the approved biologist and under consultation with the CDFW.	Incorporation of measure into plans and specifications/ Non-breeding season surveys/ Consultation with CDFW/ Exclusion of bats	Plans and specifications check/ Survey by qualified biologist with bat experience/ Record of communication/ Construction monitoring	Final Design/ Pre-construction between October 1 and February 28/ As applicable/ As applicable during construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
B-7 Bat Exclusion Devices Once it has been determined that all roosting bats have been safely excluded from the Bridge, exclusionary devices approved by the CDFW would be installed and maintained to prevent bats from roosting in these areas prior to and during construction. A summary report would be prepared upon completion of these activities and submitted to the CDFW.	Incorporation of measure into plans and specifications/ CDFW Approval/ Exclusionary device installation and maintenance/ Submittal of summary report	Plans and specifications check/ Record of Communication/ Construction Monitoring/ Verification of submittal	Final Design/ As applicable after exclusion/ Pre-construction/ Following construction	City's Public Works Department
B-8 Pre-Construction Wildlife Surveys Pre-construction wildlife surveys would be completed by a qualified biologist no more than 48 hours prior to clearing, grubbing, or other activities to determine the presence/absence of nesting birds, bats or other sensitive species within 300 feet of the construction area. Surveys would be repeated if construction activities are suspended for five days or more. If any wildlife species are identified, appropriate measures would be developed and implemented to avoid impacts on these species, in consultation with resource agencies as applicable.	Incorporation of measure into plans and specifications/ Pre-construction surveys/ Implementation of additional measures and consultation with resource agencies	Plans and specifications check/ Survey by qualified biologist/ Construction monitoring and record of communication	Final Design/ Pre-construction, no more than 48 hours prior to construction; repeated if construction is suspended for five days or more/ As applicable pre-construction	City's Public Works Department
B-9 Invasive Species Vegetation removed from the Project area would be treated and disposed of in a manner that would prevent the spread of invasive species on- or off-site. New landscaping materials, including erosion control seed mixes, would be composed of non-invasive species, and all erosion control and landscape planting would be conducted in a manner that would not result in the spread of invasive species.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
B-10 Staging Areas Staging areas would be outside the channel to reduce direct and indirect impacts on Ballona Creek.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
B-11 Best Management Practices BMPs would be implemented to reduce dust, dirt, and construction debris from leaving the construction area.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
B-12 Equipment Refueling and Maintenance All equipment refueling and maintenance would be conducted in the staging area per standard specifications. In addition, BMPs would be implemented during construction to reduce potential impacts associated with leaks and spills of oil, fuel, or machinery fluids.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
B-13 All Materials and Trash Removed All trash and construction debris would be removed from the channel and construction areas on a daily basis. All BMPs would be properly maintained during Project construction, and removed upon completion of construction activities. After completion of the Project, all construction equipment, materials, and scaffolding would be removed from the Project area.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
C-1 Assessment of Resources if Found Prior to construction, a Phase 1 Archaeological/Paleontological Survey shall be completed and submitted to the Planning Manager for review. If the Phase 1 Archaeological/Paleontological Survey indicates the presence of archaeological and/or paleontological resources, then an archaeological and/or paleontological professional(s), approved by the City, shall monitor all phases of the excavation for the project site. In the event that the Phase 1 Archaeological/Paleontological Survey determines that no such resources exist but undetected fossil resources and/or human remains, or other archaeological/paleontological resources are encountered during construction activities, work in that area must be halted, and both the City of Culver City and the coroner must be notified. Standard measures required by California Health and Safety Code Section 7050.5 will be followed. Work will be halted in that area of the detected resource until the City of Culver City's archaeologist, paleontologist and Native American representatives have been contacted to evaluate the resources and permission to commence work in that area has been given by the City of Culver City.	Incorporation of measure into plans and specifications/ Stop work/ Survey and implementation of additional measures as needed	Plans and specifications check/ Construction monitoring/ Survey by archaeologist or monitor and construction monitoring of any additional measures/record of communication	Final design/ As applicable during construction/ As applicable during construction	City's Public Works Department
H-1 Lead and Asbestos Survey A lead and asbestos survey will be completed by a licensed specialist prior to construction to determine if there are lead- and asbestos-containing materials in the Bridge structure. If none are found, no further action is required.	Incorporation of measure into plans and specifications/ Pre-construction surveys	Plans and specifications check/ Surveys by licensed specialist	Final design/ Pre-construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
H-2 Proper Disposal If found in the Bridge structure, lead- and asbestos-containing materials will be handled and disposed of in a manner approved by the California Division of Occupational Safety and Health (Cal-OSHA).	Incorporation of measure into plans and specifications/ Approved handling and disposal of materials	Plans and specifications check/ Construction monitoring	Final design/ As applicable during construction	City's Public Works Department
H-3 Testing Prior to Dewatering If dewatering is required during foundation construction, water will be tested and/or treated prior to discharge into the sanitary sewer.	Incorporation of measure into plans and specifications/ Water testing	Plans and specifications check/ Construction monitoring	Final design/ As applicable during construction, prior to dewatering	City's Public Works Department
H-4 Testing Prior to Soil Disposal Spoils from foundation excavations will be tested to the satisfaction of the planned soil recipient prior to transportation or disposal.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
W-1 Reduced Work Areas Work areas shall be reduced per the City Engineer's direction to avoid the Creek and minimize impacts on jurisdictional areas. Reduction in work area will reduce the probability of pollution entering the Creek and/or being carried off site.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
W-2 Staging Areas Outside the Channel Staging of construction trucks, equipment, and materials, shall be outside the channel in an area approved by the City Engineer to reduce direct and indirect impacts on the Creek. All Creek inlet structures such as catch basins shall be protected to prohibit construction debris from entering the Creek.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
W-3 Debris Containment Measures shall be implemented during construction to minimize the potential for concrete dust, debris, paint chips, rust, and construction materials to fall into the channel, or otherwise leave the construction area. Possible methods to prevent materials from falling into the channel include tenting or constructing a debris-catching platform below the Bridge. The contractor shall be required to submit a "Debris Containment Plan" for review and approval by the City Engineer	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
W-4 No Work in Flowing Water Equipment traveling in the Creek shall be restricted to the dry side of the channel and shall not be allowed to enter the wetted portion of the Creek, or anywhere there is flowing water.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
W-5 Daily Equipment Checks All equipment used in the Creek will be checked daily for fluid leaks. Any equipment found to be leaking fluids shall not be allowed to enter the Creek. Drip pans will be placed beneath all construction equipment when not in use.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
W-6 Equipment Maintenance All equipment refueling and maintenance will be conducted outside the Creek in the staging area per standard specifications and the approved Stormwater Pollution Prevention Plan (SWPPP). In addition, BMPs will be implemented during construction to reduce potential impacts associated with leaks and spills of oil, fuel, or machinery fluids.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
W-7 Trash and Construction Debris Removal All trash and construction debris shall be removed from the channel and construction areas on a daily basis and as needed. All BMPs will be properly maintained during Project construction, and removed upon completion of construction activities. After completion of the Project, all construction equipment, materials, and scaffolding will be removed from the Project area.	Incorporation of measure into plans and specifications/ Implementation of measure during construction/ Removal following construction	Plans and specifications check/ Construction monitoring/ Construction monitoring	Final design/ Construction/ Following construction	City's Public Works Department
W-8 Stormwater Pollution Prevention Plan The contractor will be required by the City to prepare and submit a Stormwater Pollution Prevention Plan (SWPPP) to include special measures to mitigate potential construction impacts to the Creek and shall be reviewed and approved by City staff prior to construction.	Implementation of measure prior to construction	Plans and specifications check	Prior to construction	City's Public Works Department
N-1 Hours of Construction Where feasible, construction will be scheduled during daytime hours to minimize disturbance to nearby noise-sensitive land uses. In accordance with City noise regulations, construction hours will generally be limited to the hours of 8:00 a.m. to 8:00 p.m., Monday through Friday; between the hours of 9:00 a.m. to 7:00 p.m. on Saturdays, and between the hours of 10:00 a.m. to 7:00 p.m. on Sundays. Limited nighttime construction may be required to avoid substantial traffic disruption or public safety concerns. This work would be contingent upon approval from the City, and the City of Los Angeles and would be consistent with Caltrans Standard Specifications. Dirt hauling shall only occur between 9:00 am and 3:00 pm.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

MITIGATION MONITORING PROGRAM P-553, Higuera Street Bridge over Ballona Creek Replacement Project January 2015				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
N-2 Equipment Tuning and Use of Mufflers All equipment will have sound-control devices as effective as those provided on the original equipment. All equipment will have a muffled exhaust.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
N-3 Standard Specifications: Noise Control If nighttime work is required, per Caltrans' Standard Specifications Section 14-8.02 "Noise Control" noise levels would not exceed 86 dBA Lmax at 50 feet from the job site activities from 9 p.m. to 6 a.m.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
N-4 Standard Specifications: Use of Mufflers Per Caltrans' Standard Specifications Section 14-8.02 "Noise Control" each internal combustion engine used for any purpose on the job, or related to the job, shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated on the job site without an appropriate muffler.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department
N-5 Standard Specifications: Noise Abatement Measures Per Caltrans' Standard Specifications Section 14-8.02, "Noise Control," the contractor would, as directed by the Caltrans' resident engineer, implement appropriate additional noise abatement measures including, but not limited to, changing the location of stationary construction equipment, turning off idling equipment, rescheduling construction activity, notifying adjacent residents in advance of construction work, or installing acoustic barriers around stationary construction noise sources.	Incorporation of measure into plans and specifications/ Implementation of measure during construction	Plans and specifications check/ Construction monitoring	Final design/ Construction	City's Public Works Department

REFERENCES UTILIZED:

1. AMBIENT Air Quality and Noise Consulting. May 2014. *Air Quality Study Report*.
2. AMBIENT Air Quality and Noise Consulting. December 2013. *Noise Technical Memorandum*.
3. California Department of Conservation. 2011. *Los Angeles County Important Farmland 2010*. Division of Land Resource Protection, Farmland Mapping and Monitoring Program. Published September. Accessed April 17, 2013 from <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>.
4. Caltrans (California Department of Transportation). n.d. *California Scenic Highway Mapping System, Los Angeles County*. Webpage. Accessed June 5, 2013 from http://www.dot.ca.gov/hq/LandArch/scenic_highways/.
5. California Department of Transportation (Caltrans). 2002. *Transportation Related Earthborne Vibrations (Caltrans Experiences)*.
6. _____. April 2013. *Historical Bridge Inventory – Local Agency Bridges*.
7. _____. February 23, 2012. *Archaeological Review of the Bridge Replacement Project [BHLS-5240(026)]*.
8. City of Culver City. 1995. *Culver City General Plan, Circulation Element*. Accessed April 15, 2013 from <http://www.culvercity.org/~media/Files/Planning/GeneralPlan/Circulation%20Element.ashx>.
9. _____. 2007a. *Alquist-Priolo Earthquake Fault Zones*. January 31. Accessed April 9, 2013 from <http://www.culvercity.org/Government/IT/Gis.aspx>.
10. _____. 2007b. *General Plan Land Use Element Map*. August 28. Accessed April 9, 2013 from http://www.culvercity.org/~media/Maps/Map05_GeneralPlanLandUse%20pdf.ashx.
11. _____. 2007c. *Natural Hazards, Fire and Flooding*. February 1. Accessed April 9, 2013 from http://www.culvercity.org/~media/Maps/Map07_NaturalHazards%20pdf.ashx.
12. _____. 2007d. *Seismic Hazards*. February 1. Accessed April 9, 2013 from http://www.culvercity.org/~media/Maps/Map06_Liquefaction_Landslide%20pdf.ashx.
13. _____. 2010a. *Culver City Bicycle and Pedestrian Master Plan*. Adopted by City Council November 8, 2012. BTA Approval Received March 29, 2012. Prepared by Alta Planning + Design. Accessed May 16, 2013 from http://www.culvercity.org/~media/Files/PW/TrafficEngineering/CCBPMP_20120329.ashx.
14. _____. 2010b. *Tsunami Map*. April 22. Modeled by the Tsunami Research Center, University of Southern California. Los Angeles, California. Accessed April 9, 2013 from <http://www.culvercity.org/~media/Maps/TsunamiMap.ashx>.
15. _____. 2011. *Preliminary Engineering Report for Higuera Bridge Replacement / Rehab-Retrofit Project*. Public Works Department. Prepared by IDC. Anaheim, California.
16. _____. *Culver City Municipal Code. Title 9, Chapter 9.07, Noise Regulations*. Accessed December 6, 2013 from: [http://www.amlegal.com/nxt/gateway.dll/California/culver/themunicipalcodeofthecityofculvercitycal?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:culvercity_ca](http://www.amlegal.com/nxt/gateway.dll/California/culver/themunicipalcodeofthecityofculvercitycal?f=templates$fn=default.htm$3.0$vid=amlegal:culvercity_ca).
17. _____. 2011. *Culver City Capital Improvement Projects 2013/2014*. Accessed May 9, 2014 from <http://www.culvercity.org/Government/PublicWorks/CIP.aspx>
18. City of Los Angeles. *Los Angeles Municipal Code. Chapter IX, Section 41.40, Noise Due to Construction, Excavation Work-When Prohibited*. Accessed December 6, 2013 from [http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc).
19. County of Los Angeles. 2012. *Bicycle Master Plan Program Environmental Impact Report; Chapter 3.8 Mineral Resources*. Accessed from http://dpw.lacounty.gov/pdd/bikepath/bikeplan/docs/3.8_Mineral_Resources.pdf

20. ENGEO. *Phase I Initial Site Assessment*. December 17, 2013. Revised April 2, 2014.
21. FEMA (Federal Emergency Management Agency). 2008. *FIRM, Flood Insurance Rate Map, Los Angeles County, California and Incorporated Areas, Map Number 06037C1595F*. Effective September 26. Accessed April 23, 2013 from <https://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1&userType=G>.
22. Google, Inc. 2013. *Google Maps*. Accessed April 8, 2013 from <https://maps.google.com>.
23. Minagar Associates, Inc. May 2014. *Traffic Impact Study for Higuera Street Bridge Replacement Project*.
24. SCAG. 2013. *2012 – 2035 Regional Transportation Plan/Sustainable Communities Strategy, Amendment No. 1*. Adopted June 2013. Accessed May 13, 2014 from <http://rtpscs.scag.ca.gov/Documents/2012/famendment/2012A01RTPSCSFTIP.pdf>.
25. SCAG. 2014. *2013 Federal Transportation Improvement Program, Amendment No. 13-17*. Approved April 2014.
26. SCAQMD. 2011. *SCAQMD Air Quality Significance Thresholds*. Revised March 2011. Accessed May 14, 2014 from <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>
27. USGS (U.S. Geological Survey). 1995. *Beverly Hills Quadrangle, California – Los Angeles County* [map]. 1:24,000. 7.5 Minute Series. Denver, CO: United States Department of the Interior, USGS. Accessed August 15, 2013 from http://store.usgs.gov/b2c_usgs/catalog/setCurrentItem/%28isQuery=yes&layout=6_1_61_58&uiarea=2&ctype=catalogQuery&next=seeltem&carearea=%24ROOT&cittem=00000004530000000371%29/.do.

RESPONSE TO COMMENTS ON THE DRAFT IS/MND:

The City invited public comments on the Draft IS/MND during the public circulation period, which began on November 25, 2014 and ended on December 26, 2014. The City posted the Draft IS/MND on the City's website on November 25, 2014, submitted a Notice of Completion (NOC) to the State Clearinghouse (SCH) on November 25, 2014, and filed a Notice of Intent (NOI) to the Los Angeles County Clerk and the Governor's Office of Planning and Research (OPR) on November 24, 2014.

The Draft IS/MND was available at the Planning Division Office, at the Culver City Julian Dixon Library, and on the City's website. During the public circulation period, two comments were received:

1. Betty Courtney, Environmental Program Manager, California Department of Fish and Wildlife, South Coast Region.
2. Orchids de Oro and Thomas Henry, 5929 Rodeo Road, Los Angeles.

The City has incorporated textual changes to the Final IS/MND, which are illustrated by a vertical line in the left hand margin. Text additions are underlined; text deletions have a strikethrough. The comment letters and individual responses to comments are provided below.

Letter 1 - California Department of Fish and Wildlife (Page 1 of 2).



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



December 26, 2014

Mr. Sammy Romo, Project Engineer
Culver City Public Works
9770 Culver City Blvd.
Culver City, CA 90232
Fax: 310-253-5721

**Subject: Comments on the Draft Initial Study and Mitigated Negative Declaration
for the Higuera Street Bridge Over Ballona Creek Replacement Project,
Los Angeles County (SCH# 2014111072).**

Dear Mr. Romo:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Initial Study and Mitigated Negative Declaration (MND) prepared by Culver City for the Higuera Street Bridge Over Ballona Creek Replacement Project (Project). The Project is located on Higuera Street between Jefferson Boulevard and Eastham Drive, in both Culver City and the City of Los Angeles. The Project, as approved, would include the replacement and widening of the existing Higuera Street Bridge from 41 feet wide to 70 feet wide. The Project will also include a new ramp connection from Higuera Street to the existing Ballona Creek bike path. The MND includes protection measures for bats, nesting birds (including swallows and swifts), and includes obtaining a Streambed Alteration Agreement in the Biological Analysis Section.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

Biological Analysis

- 1) Rare, Threatened and Endangered Plants. The Project description in the MND indicates the Project will impact non-concrete lined, vegetated slopes adjacent to the concrete lined channel. The Department recommends the City address the potential for rare plants in or adjacent to the Project site in the MND:
 - a) The Department recommends including botanical surveys for southern tarplant (*Centromadia parryi ssp. australis*; California Rare Plant Ranking 1B.1) and

Conserving California's Wildlife Since 1870

Letter 1 - California Department of Fish and Wildlife (Page 2 of 2).

Sammy Romo
December 26, 2014
Page 2 of 2

Orcutt's pincushion (*Chaenactis glabiuscula* var. *orcuttiana*; California Rare Plant Ranking 1B.1) in addition to any other sensitive plant species that could potentially be impacted by the Project.

- 2) Burrowing Owl (*Athene cunicularia*). The Department recommends the lead agency address in the MND the potential for burrowing owl to be present on or adjacent to the Project site.
- a) To maximize detection of burrowing owl on and adjacent to the project site and assess impact avoidance and mitigation for unavoidable impacts, the Department recommends that the lead agency condition adherence to the Department's survey and mitigation protocol found within the 2012 CDFW Staff Report on Burrowing Owl Mitigation. Website:
<http://www.dfg.ca.gov/wildlife/nongame/docs/BUOWStaffReport.pdf>. These guidelines further clarify consideration for habitat mitigation lands for burrowing owl and assist in reducing impact to burrowing owl and their habitat to less than significant levels. All mitigation lands should be protected in perpetuity and managed by a local land conservancy.

We appreciate the opportunity to comment on the referenced MND. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at Kelly.Schmoker@wildlife.ca.gov or (949) 581-1015.

Sincerely,



Betty Courtney
Environmental Program Manager I

cc: Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Victoria Chau, CDFW, Los Alamitos
Ms. Sarah Rains, CDFW, Ventura
Mr. Scott Harris, CDFW, Pasadena
Scott Morgan, State Clearinghouse

Response to Letter 1 - California Department of Fish and Wildlife.

COMMENTER: Betty Courtney, Environmental Program Manager, California Department of Fish and Wildlife, South Coast Region.

DATE: December 26, 2014

Comment 1:

The Department recommends the City address the potential for rare plants in or adjacent to the Project site in the ISMND. The Department recommends including botanical surveys for southern tarplant (*Centromadia parryi* ssp. *australis*; California Rare Plant Ranking 1B.1) and Orcutt's pincushion (*Chaenactis glabiuscula* var. *orcuttiana*; California Rare Plant Ranking 1B.1) in addition to any other sensitive plant species that could potentially be impacted by the Project.

Biological surveys were conducted of the entire project area by GPA biologists on October 18, 2011, October 20, 2011, and June 20, 2013. All vegetation communities in the project area were visually surveyed on foot and were identified as weedy, non-native, and landscaped species. No rare plant species or suitable habitat for rare plant species, including the southern tarplant (blooming period: May – November) and Orcutt's pincushion (blooming period: January – August), were observed during any of the surveys, which were conducted during the appropriate blooming period for these species. Habitat within the project area is disturbed, and there is no suitable habitat for rare plant species; therefore, these species are not expected to be within the project area. In addition, pre-construction surveys would be conducted for 48 hours prior to construction to further reduce the potential for impacts on biological resources (Mitigation Measure B-8 in the IS/MND).

Comment 2:

The Department recommends the lead agency address in the ISMND the potential for burrowing owl to be present on or adjacent to the project site. To maximize detection of burrowing owl on and adjacent to the project site and assess impact avoidance and mitigation for unavoidable impacts, the Department recommends that the lead agency condition adherence to the Department's survey and mitigation protocol found within the 2012 CDFW Staff Report on Burrowing Owl Mitigation.

The project area is located in an urban setting and is surrounded by commercial and industrial land uses. Habitat in the project area is disturbed and vegetation consists of weedy, non-native, and landscaped species. There are no grasslands or open areas in the project area, and no small mammal burrows were observed in the project area during the biological surveys conducted on October 18, 2011, October 20, 2011, and June 20, 2013. Therefore, there is no suitable habitat for burrowing owl in the project area, and this species is not expected to be in the project area. In addition, pre-construction surveys would be conducted 48 hours prior to construction to further reduce the potential for impacts on biological resources (Mitigation Measure B-8 in the IS/MND).

Letter 2 – Orchids de Oro and Thomas Henry (Page 1 of 4).

Received 12/24/2014
10:31 am

STANLEY ROSS COLEITE
ATTORNEY AT LAW
1250 SIXTH STREET, SUITE 205
SANTA MONICA, CALIFORNIA 90401
TELEPHONE (310) 393-1524
FACSIMILE (310) 576-3581

December 24, 2014

Re: Higuera Street Bridge over Ballona Creek Replacement Project, P-553

Project Sponsor: Attn: Sammy Romo, Project Engineer
City of Culver City Public Works Department
9770 Culver Boulevard
Culver City, CA 90232-0507

Response and Objection by: Orchids de Oro and Thomas Henry
5939 Rodeo Road, Los Angeles, CA 90016
(310) 838-4262

To: The City of Culver City; and Mr. Sammy Romo, Project Engineer

**RESPONSE AND OBJECTION TO THE PROPOSED MITIGATED NEGATIVE
DECLARATION**

A. Summary of Response and Objection

Orchids de Oro is an exclusive landscaping design business located at 5939 Rodeo Road, Los Angeles, CA 90016, *directly adjacent* to the Higuera Street Bridge over Ballona Creek Replacement Project (the "Project"). Orchids de Oro is operated by Mr. Thomas Henry. Orchids de Oro and Mr. Henry are referred to herein as Objectors. The showroom (which is in an open-air building) contains rare and exotic plants, botanical arrangements, interior settings, European and Asian statuary, and rare objets d'art.

The Project is going to use a right of way which will deprive Orchids de Oro of a substantial portions of its parking lot; cause clients substantial difficulty in parking and reaching the business; and which will send dust and pollutants throughout the opened showroom. The Proposed Mitigated Negative Declaration ("Proposed Declaration") fails to account for the damage to the showroom that the Project will cause.

The City of Culver City, through its Planning Division (the "City") has found in its Proposed Declaration that though the Initial Study in this matter identified potentially significant effects, revisions in the project plans or proposals made by, or agreed to by the applicant before the Proposed Declaration would avoid the effects or mitigate the effects

Letter 2 – Orchids de Oro and Thomas Henry (Page 2 of 4).

Response and Objection by:
Orchids de Oro and Thomas Henry
Page 2

or mitigate the effects to a point where clearly no significant effects would occur; and that there is no substantial evidence before the agency that the project as revised may have a significant effect on the environment. Thus, thus it has been found that an Environmental Impact Report (“EIR”) is not required. Though not questioning the good faith of the City, in order that there be an independent review of the project, it is respectfully submitted that an EIR be ordered by an independent agency.

Orchids de Oro and Thomas Henry (“Objectors”) respond and object as follows:

1. An EIR is required since the Proposed Declaration fails to adequately set forth the key required findings and does not comply with the law.
2. The findings are not sufficient to enable the parties to determine whether and on what basis they should seek judicial review;
3. The findings as to significant issues do not apprise a reviewing court of the basis for the City’s action; and
4. An independent EIR is required.

B. Response and Objections

The Proposed Declaration states:

“The Initial Study identified potentially significant effects, but the Proposed Declaration on page 1 states:

1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this proposed MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and
2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.”

For the reasons set forth below, such is not the case and an EIR is required.

C. The Law Applicable Herein

The Supreme Court has specifically held in *Topanga Assn. for a Scenic Community v. County of Los Angeles* (“*Topanga*”) (1974) 11 Cal. 3d 506, 514-515 that in the administrative context, whether a city ordinance requires it or not, the administrative agency must comply with certain key requirements:

Letter 2 – Orchids de Oro and Thomas Henry (Page 3 of 4).

Response and Objection by:
Orchids de Oro and Thomas Henry
Page 3

- The agency "...must render findings sufficient both to enable the parties to determine whether and on what basis they should seek review...." *Topanga Assn. for a Scenic Community v. County of Los Angeles* ("Topanga") (1974) 11 Cal. 3d 506, 514.
- "...the findings must be able to apprise a reviewing court of the basis for the board's action." *Id.*
- The agency "...which renders the challenged decision must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order." *Id.* at p. 515.

Significant portions of the Proposed Declaration fail these tests.

C. Analysis

The findings of the Proposed Declaration do not meet the requirements of *Topanga* as the following makes clear:

a. Insufficient findings as to a bottleneck.

The Proposed Declaration states at page 6:

"The new Bridge would have two 12-foot vehicle lanes, a 5-foot bike lane, and a 6-foot sidewalk in each direction. With implementation of the Project, one vehicle lane would be added to the Bridge to close the existing gap, thus eliminating the bottleneck. The number of through lanes at the adjacent Higuera Street intersections (two lanes in each direction) would remain the same. The Project would also include a new ramp connection from Higuera Street to the Bike Path."

Such a statements completely fails to follow the requirements of *Topanga*. What bottleneck? What is the documentation for a bottleneck to exist? How can a Court "bridge the analytic gap" between the evidence (when there is no evidence) and the decision that the Project would ameliorate any bottleneck. A proper EIR should resolve these issues.

b. Section III, Air Quality. Page 22, et seq. Fails to Meet the Topanga Standards

Section III, Air Quality, page 22 asks whether the Project would:

"(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?"

Letter 2 – Orchids de Oro and Thomas Henry (Page 4 of 4).

Response and Objection by:
Orchids de Oro and Thomas Henry
Page 4

...
“(d) Expose sensitive receptors to substantial pollutant concentrations?”

The response to both of these questions was that there was that there was “**Potentially Significant Impact Unless Mitigation Incorporated.**” Emphasis added.

The findings go on to state in part that the mitigation plan would remedy this situation through implementation of the mitigation measures set forth at paragraphs A-1 through A-12 (pages 25-26). Mitigation plan A-4 merely states, however:

“A-4 Dust Control Plan

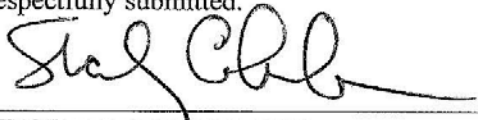
A dust control plan **will be developed** to document sprinkling, temporary paving, speed limits, and expedited revegetation of disturbed slopes as needed to minimize fugitive dust emissions.” Emphasis added.

Such a finding is completely at variance with the dictates of *Topanga* since the finding merely states that the “...**dust control plan will be developed.**” There is no specificity as to what the plan will be, when it will be developed, or how it will protect Objectors, whose showroom is directly at the point of construction. There is nothing in writing at all to insure the protection of Objectors.

D. Conclusion

Though the integrity of the Applicant and the City are not questioned, both are interested parties with the desire to proceed and the findings are not adequate. Objectors respectfully submit that there should be an independent review and that an EIR is required for the reasons set forth above.

Respectfully submitted,



STANLEY ROSS COLEITE
Attorney for Objecting Parties

Response to Letter 2 – Orchids de Oro and Thomas Henry (Page 4 of 4).

COMMENTER: Orchids de Oro and Thomas Henry

DATE: December 24, 2014

Section A

“Orchids de Oro is an exclusive landscaping design business located at 5939 Rodeo Road, Los Angeles, CA 90016, directly adjacent to the Higuera Street Bridge over Ballona Creek Replacement Project (“the Project”). Orchids de Oro is operated by Mr. Thomas Henry. Orchids de Oro and Mr. Henry are referred to herein as Objectors. The showroom (which is an open-air building) contains rare and exotic plants, botanical arrangements, interior settings, European and Asian statuary, and rare objets d’art.

The Project is going to use a right of way which will deprive Orchids de Oro of a substantial portions of its parking lot; cause clients substantial difficulty in parking and reaching the business; and which will send dust and pollutants throughout the opened showroom. The Proposed Mitigated Negative Declaration (“Proposed Declaration”) fails to account for the damage to the showroom that the Project will cause.”

As outlined in the Project Description located on page 7 of 66 of the Initial Study (IS), right of way acquisition of approximately 791 square feet of private land adjacent to the Bridge would be required from two parcels to the south of the Bridge, including Assessor’s Parcel Numbers (APNs) 4205-025-008 and 4205-025-003. The property located at 5939 Rodeo Road, Los Angeles, CA 90016 is located north of the Bridge and identified as APN 4205-027-012. No right of way is required from this parcel, and no private lands would be physically altered as a result of the project.

An Air Quality Study Report (AQSR) was completed for the project by AMBIENT Air Quality & Noise Consulting in May 2014. The conclusions found in this study have been incorporated into the Air Quality section of the IS, beginning on page 22 of 66. As outlined in this section, with the incorporation of Mitigation Measures A-1 through A-12, short-term air quality impacts resulting from construction activities would be reduced to a less than significant level, satisfying the requirements of the California Environmental Quality Act (CEQA). No long-term impacts on air quality would occur as a result of the project.

“The City of Culver City, through its Planning Division has found in its Proposed Declaration that though the Initial Study in this matter identified potentially significant effects, revisions in the project plans or proposals made by, or agreed to by the applicant before its Proposed Declaration would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur; and that there is no substantial evidence before the agency that the project as revised may have a significant effect on the environment. Thus, thus it has been found that an Environmental Impact Report (“EIR”) is not required. Though not questioning the good faith of the City, in order that there be an independent review of the project, it is respectfully submitted that an EIR be ordered by an independent agency.

Orchids de Oro and Thomas Henry (“Objectors”) respond and object as follows:

- 1. An EIR is required since the Proposed Declaration fails to adequately set forth the key required findings and does not comply with the law.**
- 2. The findings are not sufficient to enable the parties to determine whether and on what basis they should seek judicial review;**

3. The findings as to significant issues do not apprise a reviewing court of the basis for the City's action; and

An independent EIR is required."

According to Section 15070 of the CEQA Guidelines, "A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- (b) The initial study identified potentially significant effects, but:
 - (1) Revisions in the project plans or proposals made by or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - (2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment."

According to Section 15064(a)(1) of the CEQA Guidelines, "If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, the agency shall prepare a draft EIR."

The City of Culver City (City) completed a thorough environmental evaluation, in compliance with CEQA, in an effort to identify potential environmental impacts related to the project. This process included the completion of technical studies, including studies of hazardous materials, biological resources, noise and air quality, and water quality. After careful analysis of scientific and factual data, it was determined that the project would not result in a significant effect on the environment with implementation of the mitigation measures outlined in the Initial Study/Mitigated Negative Declaration (IS/MND). This determination satisfies the requirements of CEQA; therefore, an EIR is not required.

Section B

"The Proposed Declaration states:

'The Initial Study identified potentially significant effects, but the Proposed Declaration on page 1 states:

- 1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this proposed MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and**
- 2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.'**

For the reasons set forth below, such is not the case and an EIR is required."

No response is required.

Section C

"The Supreme Court has specifically held in *Topanga Assn. for a Scenic Community v. County of Los Angeles* ("*Topanga*") (1974) 11 Cal. 3d 506, 514-515 that in the administrative context, whether a city ordinance requires it or not, the administrative agency must comply with certain key requirements:

- The agency “...must render findings sufficient both to enable the parties to determine whether and on what basis they should seek review...” *Topanga Assn. for a Scenic Community v. County of Los Angeles* (“*Topanga*”) (1974) 11 Cal. 3d 506, 514.
- “...the findings must be able to apprise a reviewing court of the basis for the board’s action.” *Id.*
- The agency “...which renders the challenged decision must set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order. *Id.* at p. 515.

The findings of the Proposed Declaration do not meet the requirements of *Topanga* as the following makes clear:

a. Insufficient findings as to a bottleneck.

The Proposed Declaration states at page 6: ‘The new Bridge would have two 12-foot vehicle lanes, a 5-foot bike lane, and a 6-foot sidewalk in each direction. With implementation of the Project, one vehicle lane would be added to the Bridge to close the existing gap, thus eliminating the bottleneck. The number of through lanes at the adjacent Higuera Street intersections (two lanes in each direction) would remain the same. The Project would also include a new ramp connection from Higuera Street to the Bike Path.’

Such a statements completely fails to follow the requirements of *Topanga*. What bottleneck? What is the documentation for a bottleneck to exist? How can a Court ‘bridge the analytic gap’ between the evidence (when there is no evidence) and the decision that the Project would ameliorate any bottleneck. A proper EIR should resolve these issues.”

As outlined in the Project Description located on page 2 of 66 of the IS, the California Department of Transportation (Caltrans) completed a Bridge Inspection Report (BIR) and determined the Higuera Street Bridge (Bridge) is functionally obsolete, partially due to inadequate curb-to-curb width compared to the roadway approaches; nonstandard Bridge railings and approach transitions; and the absence of shoulders and a median on the Bridge. All of these factors contribute to the gap in existing facilities between the approach roadways and the Bridge, and resulting bottleneck conditions.

b. “Section III, Air Quality. Page 22, et seq. Fails to Meet the *Topanga* Standards

Section III, Air Quality, page 22 asks whether the Project would: ‘(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?’ ‘(d) Expose sensitive receptors to substantial pollutant concentrations?’

The response to both of these questions was that there was “*Potentially Significant Impact Unless Mitigation Incorporated.*” Emphasis added.

The findings go on to state in part that the mitigation plan would remedy this situation through implementation of the mitigation measures set forth at paragraphs A-1 through A-12 (pages 25-26). Mitigation plan A-4 merely states, however:

‘A-4 Dust Control Plan

A dust control plan *will be developed* to document sprinkling, temporary paving, speed limits, and expedited revegetation of disturbed slopes as needed to minimize fugitive dust emissions. Emphasis added.

Such a finding is completely at variance with the dictates of *Topanga* since the finding merely states that the ‘...*dust control plan will be developed.*’ There is no specificity as to what the plan will be, when it will be developed, or how it will protect Objectors, whose showroom is directly at the point of construction. There is nothing in writing at all to insure the protection of Objectors.”

As noted in the AQSR, the project would be required to comply with Caltrans' Standard Specifications, Section 14-9 "Air Quality" pertaining to dust control and dust palliative requirements. These requirements include various measures to reduce emissions of fugitive dust and minimize potential impacts on nearby land uses. Furthermore, to minimize public nuisance impacts and to better ensure compliance with Caltrans' Standard Specifications and applicable rules and regulations, implementation of a dust control plan would also be required.

As noted above, Caltrans' Standard Specifications, Section 14 specifically requires compliance with all applicable laws and regulations related to air quality, which would include applicable South Coast Air Quality Management District (SCAQMD) rules and regulations. This would include compliance with SCAQMD Rules 402 and 403. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off-site. SCAQMD Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce fugitive dust emissions and potential public nuisance impacts. These measures target various construction operations such as backfilling, clearing and grubbing, crushing, cut and fill, demolition, earth-moving activities, bulk material import and export, construction staging, stockpiles/bulk material handling, trenching, and loading. The specific measures to be implemented may vary depending on the activities conducted, equipment used, and site conditions.

As noted in the AQSR, the specific measures to be implemented and included in the dust control plan will include, but are not necessarily limited to, the following:

- The construction contractor shall comply with Caltrans' Standard Specifications in Section 14 (2010).
 - o Section 14-9.01 specifically requires compliance by the contractor with all applicable laws and regulations related to air quality, including air pollution control district and air quality management district regulations and local ordinances.
 - o Section 14-9.02 is directed at controlling dust. If dust palliative materials other than water are to be used, material specifications are contained in Section 18.
- Apply water or dust palliative to the site and equipment as frequently as necessary to control fugitive dust emissions. Fugitive emissions generally must meet a "no visible dust" criterion either at the point of emission or at the right of way line depending on local regulations.
- Spread soil binder on any unpaved roads used for construction purposes, and all project construction parking areas.
- Wash off trucks as they leave the right-of-way as necessary to control fugitive dust emissions.
- Develop a dust control plan documenting sprinkling, temporary paving, speed limits, and expedited revegetation of disturbed slopes as needed to minimize construction impacts to existing communities.
- Locate equipment and materials storage sites as far away from residential and park uses as practical. Keep construction areas clean and orderly.
- Use track-out reduction measures such as gravel pads at project access points to minimize dust and mud deposits on roads affected by construction traffic.
- Cover all transported loads of soils and wet materials prior to transport, or provide adequate freeboard (space from the top of the material to the top of the truck) to minimize emission of dust (particulate matter) during transportation.
- Promptly and regularly remove dust and mud that are deposited on paved, public roads due to construction activity and traffic to decrease particulate matter.
- Install mulch or plant vegetation as soon as practical after grading to reduce windblown particulate in the area. Be aware that certain methods of mulch placement, such as straw blowing, may themselves cause dust and visible emission issues and may need to use controls such as dampened straw.

Additional measures to be implemented to reduce emissions of Particulate Matter (PM) from mobile sources included:

- Establish Environmentally Sensitive Areas (ESAs) or their equivalent near sensitive air receptors within which construction activities involving extended idling of diesel equipment would be prohibited, to the extent feasible.
- Route and schedule construction traffic to avoid peak travel times as much as possible, to reduce congestion and related air quality impacts caused by idling vehicles along local roads.
- Properly tune and maintain construction equipment and vehicles. Use low-sulfur fuel in all construction equipment as provided in California Code of Regulations Title 17, Section 93114.
- The extended idling of heavy-duty diesel-powered construction equipment within 500 feet of nearby sensitive receptors (i.e., Willows Community School) would be prohibited during periods when the equipment is not in use.

The dust control plan will be reviewed and approved by the City staff prior to initiating construction. In addition, in an effort of good faith, Measures A-13 through A-15 have been added to the Final IS/MND. These measures have been included in the document to ensure that the public will have a course of action to follow if there are specific concerns related to air quality during construction.

Section D

“Though the integrity of the Applicant and the City are not questioned, both are interested parties with the desire to proceed and the findings are not adequate. Objectors respectfully submit that there should be an independent review and that an EIR is required for the reasons set forth above.”

As outlined in previous responses, the IS/MND complies with the requirements of CEQA; therefore, preparation of an EIR is not necessary.