Interstate 110 High-Occupancy Toll Lanes Flyover Project
Initial Study with Mitigated Negative Declaration (MND)/ Environmental Assessment with Finding of No Significant Impact (FONSI)

Los Angeles County, California
District 7-LA-110 PM 20.10/20.92
EA: 07-27800/EFIS #: 0700000537
SCH No. 2013021002

Prepared by the California Department of Transportation

April, 2018

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated December 23, 2016 and executed by FHWA and Caltrans.

Caltrans

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SCH #:2013021002
07-LA-110-PM 20.10/20.92
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I-110 High-Occupancy Toll Lane Flyover Project

Construct an elevated off-ramp structure on the Northbound (NB) I-110 between 30th Street and Figueroa Street Overcrossing (OC) in the City of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street (St.) and Adams Boulevard (Blvd.) and NB I-110 High-Occupancy Toll (HOT) off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa St.

Initial Study
with Proposed Mitigated Negative Declaration/Environmental Assessment

Submitted Pursuant to: (State) Division 13, California Public Resources Code
(Federal) 42 USC 4332(2)(C)

California Department of Transportation
and
The Los Angeles County Metropolitan Transportation Authority

Responsible Agencies:
California Transportation Commission

Jan 11, 2016
Date of Approval

Ronald Kosinski
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California Department of Transportation
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CALIFORNIA DEPARTMENT OF TRANSPORTATION
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

I-110 High-Occupancy Toll Lane Flyover Project

FOR

The California Department of Transportation (Caltrans) has determined that Alternative 2 will have no significant impact on the human environment after mitigation. This FONSI is based on the attached Environmental Assessment (EA) which has been independently evaluated by Caltrans and determined to adequately and accurately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required. Caltrans takes full responsibility for the accuracy, scope, and content of the attached EA.

The environmental review, consultation, and any other action required in accordance with applicable Federal laws for this project is being, or has been, carried-out by Caltrans under its assumption of responsibility pursuant to 23 USC 327 and the Memorandum of Understanding dated December 23, 2016.

April 24, 2018
Date

Ronald Kosinski
District Deputy Director of Environmental Planning
District 7 California Department of Transportation

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Mitigated Negative Declaration

Pursuant to: Division 13, Public Resources Code

Project Description

The California Department of Transportation (Caltrans) in cooperation with The Los Angeles County Metropolitan Transportation Authority (Metro) proposes to construct an elevated off-ramp structure on the Northbound Interstate 110 between 30th Street and Figueroa Street Overcrossing in the City of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and NB I-110 High- Occupancy Toll (HOT) off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street.

Determination

This Mitigated Negative Declaration is included to give notice to interested agencies and the public that it is Caltrans' intent to adopt a Mitigated Negative Declaration for this project. The Department has prepared an Initial Study for this project, and following public review, has determined from this study that the proposed project would not have a significant effect on the environment for the following reasons:

The proposed project would have no effect on: coastal zone, wild & scenic rivers, farmlands/timberlands, relocations, wetlands or other waters, plant species, threatened or endangered species, hydrology and floodplain.

In addition, the proposed project would have no significant effect on: parks & recreational facilities, growth, environmental justice, relocations & real acquisition (businesses/housing) displacements, visual/aesthetics, paleontology, ground vibration, and cumulative impacts.

Finally, the proposed project would have no significantly adverse effect on land use, community character & cohesion, traffic & transportation/pedestrian & bicycle facilities, cultural resources, water quality & stormwater run-off, geology, soils, seismicity & topography, hazardous waste, air quality, noise, natural communities, and animal species because the appropriate avoidance, minimization, and/or mitigation measures would reduce potential effects to insignificance.

Mitigation Measures include: electronic content for a smartphone application that describes and interprets historical resources, bus cards advertising historical sites to encourage the public to visit nearby historical properties, design and implementation of a pedestrian and bicycle friendly streetscape on Figueroa Way that includes landscaping and lighting that embraces the West Adams Community. Lastly, SHPO will review Figueroa Way re-design features for cultural compatibility.

Ronald Kosinski

Ronald Kosinski
District Deputy Director of Environmental Planning
District 7 California Department of Transportation

April 24, 2018
Date

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Summary

The California Department of Transportation (Caltrans) is the lead agency under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The lead agency is defined as the public agency that has the principal responsibility of approving a project that is subject to CEQA and NEPA. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

California participated in the "Surface Transportation Project Delivery Pilot Program" (Pilot Program) pursuant to 23 USC 327, for more than five years, beginning July 1, 2007, and ending September 30, 2012. MAP-21 (P.L. 112-141), signed by President Obama on July 6, 2012, amended 23 USC 327 to establish a permanent Surface Transportation Project Delivery Program. As a result, the Department entered into a Memorandum of Understanding pursuant to 23 USC 327 (NEPA Assignment MOU) with FHWA. The NEPA Assignment MOU became effective October 1, 2012, and was renewed on December 23, 2016 for a term of five years. In summary, the Department continues to assume FHWA responsibilities under NEPA and other federal environmental laws in the same manner as was assigned under the Pilot Program, with minor changes. With NEPA Assignment, FHWA assigned and the Department assumed all of the United States Department of Transportation (USDOT) Secretary's responsibilities under NEPA. This assignment includes projects on the State Highway System and Local Assistance Projects off of the State Highway System within the State of California, except for certain categorical exclusions that FHWA assigned to the Department under the 23 USC 326 CE Assignment MOU, projects excluded by definition, and specific project exclusions. *

The California Department of Transportation (Caltrans), in cooperation with The Los Angeles Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on the Northbound (NB) I-110 between 30th Street (St.) and Figueroa Street Overcrossing (OC) in the City of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower St. and Adams Boulevard (Blvd.) and NB I-110 High-Occupancy Toll (HOT) off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa St. All new structures will be within State right of way; minimal right of way acquisition will be acquired for maintenance, ingress/egress, access control, and setback purposes as well as emergency services access.

The current termination of the northbound I-110 HOT lanes at Adams Blvd. presents a particularly challenging bottleneck, as approximately half of the HOT lane traffic exits here to access downtown Los Angeles via Figueroa St. The existing NB HOT lane at Adams Blvd. is a concentrated accident location, which is a safety concern. According to the Traffic Accident Surveillance and Analysis System (TASAS), and the Transportation Systems Network (TSN) reports, the accident rate at this location between October 1, 2010 and September 30, 2013 is 0.23, slightly higher than the average accident rate, which is 0.21. Accident rates are expressed as number of accidents fatal plus injury divided by million vehicle miles. The accident rate considers driving conditions, and if there were any injuries or fatalities. Queuing and congestion is currently experienced on both the off-ramp and the HOT lanes themselves. Increasing capacity at this location is the key to ensuring the HOT lanes can manage delay and serve additional users.

*The line in the margin indicates where changes have been made since the document was publically circulated

The purpose of the project is to alleviate congestion and reduce the queuing and delay on the managed HOT lanes, Adams Blvd. off-ramp, and associated nearby intersections. The project would improve traffic flow in a congested area of downtown Los Angeles by removing traffic from congested and confusing intersections. Table 1 summarizes the potential impacts from each alternative.

Table 1: Summary of Potential Impacts from Alternatives

Resource Area	Potential Impacts Alternative: 1-No Build	Potential Impacts Alternative 2: Build	Avoidance, Minimization, and/or Mitigation Measures
Land Use	No Impact	No Impact	None
Consistency with State, Regional, and Local Plans and Programs	Not consistent with several objectives, policies, and goals	Consistent with objectives, policies, and goals with the incorporation of mitigation measure re-design Figueroa Way	**Mitigation:** Caltrans would request that the inconsistent policy, goal, and or objective be modified. If this does not happen, the inconsistent policy, goal, and or objective would be impacted. **Mitigation:** Re-design Figueroa Way to encourage pedestrian and bicycle use.
Parks and Recreational Facilities	No Impact	No Impact	None
Growth	No Impact	No Impact	None
Community Character and Cohesion	No Impact	Potential traffic circulation issues during construction, impacts on police/fire department response times, and impacts on pedestrians / bicyclists using Figueroa Way to access the surrounding community. The Metro bus stop currently located on Figueroa Way will impact the Metro Silver Line bus and OCTA bus lines 701 and 721.	**Minimization:** A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall include the following implementation plans: public information, motorist information, incident management, and traffic management during construction. **Mitigation:** Re-design Figueroa Way to encourage pedestrian and bicycle use. **Minimization:** The Metro Silver Line bus stop on Figueroa Way will be consolidated.
Environmental Justice	No Impact	No Impact	None
Utilities Impacts/Relocations & Emergency Services	No Impact	Potential impacts to police and fire response times during construction.	**Minimization:** A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall include the following implementation plans: public information, motorist information, incident management, and traffic management during construction.

Resource Area	Potential Impacts Alternative: 1-No Build	Potential Impacts Alternative 2: Build	Avoidance, Minimization, and/or Mitigation Measures
Traffic and Transportation/ Pedestrian and Bicycle Facilities	No Impact	Potential traffic circulation issues during construction. The Metro bus stop currently located on Figueroa Way will impact the Metro Silver Line bus and OCTA bus lines 701 and 721. Temporary impacts on pedestrians/bicyclists using Figueroa Way to access the surrounding community is anticipated during construction.	**Minimization:** A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall include the following implementation plans: public information, motorist information, incident management, and traffic management during construction. **Minimization:** The Metro Silver Line bus stop on Figueroa Way will be consolidated. **Mitigation:** Re-design Figueroa Way to encourage pedestrian and bicycle use.
Relocations and Real Acquisition (Business/Housing Displacements)	No Impact	No Impact	None
Visual/Aesthetics Impacts	No Impact	No Impact	None

Resource Area	Potential Impacts Alternative: 1-No Build	Potential Impacts Alternative 2: Build	Avoidance, Minimization, and/or Mitigation Measures
Cultural Resources	No Impact	Potential to indirectly affect two historic properties (St. John's Cathedral Church and Parish House). These effects are adverse because the impacts will indirectly alter the integrity of the historic property's setting.	**Mitigation**: Design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the West Adams community and is sensitive to the historic qualities of St. John's Episcopal Church **Mitigation**: Caltrans will create electronic content for a smartphone traveler application (The Clio or equal) that describes and interprets previously identified historic properties and historical resources nearby the flyover. Traveler application boundaries will be: the southern limit of Interstate 10 (on the north side), South Grand Avenue and I-110 (east), Martin Luther King, Jr. Boulevard (south) and South Normandie Avenue (west). **Mitigation**: Caltrans will design and implement interior car cards to be placed in the DASH shuttle buses that service the project area. The car cards will, to the extent possible, direct riders' attention to historic properties, historical resources, local landmarks and historic neighborhoods in the project area. If possible the car cards will direct riders to the Clio or equal smartphone application. The interior car cards will be posted for a minimum of six non-consecutive months. A proof and final photograph of the installed card/cards will be submitted to SHPO. **Avoidance:** If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find. **Minimization:** Caltrans shall submit design development plans for the area beneath the flyover to SHPO for review and comment. Caltrans will incorporate SHPO comments into the project plans to the fullest extent possible.
Water Quality and Storm Water Runoff	No Impact	Potential dirt, dust, and concrete waste may impact water quality/stormwater runoff.	**Minimization:** Storm drain inlet protection will be deployed the roadway should be swept regularly to minimize dirt and dust. **Minimization:** Concrete wastes will be managed through the use of concrete washout facilities. **Minimization:** Temporary silt fence shall be utilized to protect existing vegetation. **Minimization:** Various waste management, materials handling, and other housekeeping BMPs will be used. **Minimization:** Construction sequencing will be scheduled. **Minimization:** A Water Pollution Control Plan will be prepared. **Minimization:** Comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit requirements. **Minimization:** Comply with the provisions identified in the NPDES Statewide Storm Water Permit Waste Discharge Requirements.

Resource Area	Potential Impacts Alternative: 1-No Build	Potential Impacts Alternative 2: Build	Avoidance, Minimization, and/or Mitigation Measures
Geology, Soils, Seismicity and Topography	No Impact	Groundwater may be impacted depending on the depth of bents.	**Minimization:** If the build alternative is selected, a site-specific geotechnical investigation shall be conducted prior to the detailed design phase.
Paleontology	No Impact	Paleontological resources may be discovered during construction.	**Avoidance:** If during construction paleontological resources are discovered, a qualified paleontologist will need to recover them. Construction work will be halted or diverted.
Hazardous Waste	No Impact	Potential impacts include disturbance of asbestos-containing material, worker exposure to lead during construction, Treated Wood Waste (TWW), and construction debris.	**Minimization:** An Asbestos Containing Material (ACM) Survey will be performed by a certified Asbestos Consultant (CAC) and Certified Lead Inspector (CLI). **Minimization:** The development of a project-specific Lead Compliance Plan (LCP) and training program to ensure proper health and safety measures are implemented and complied prior to start of the removal operation will be required. **Minimization:** A TWW disposal health and safety plan will be prepared. **Minimization:** A Debris Containment and Disposal Work Plan will be prepared. **Minimization:** Removal of yellow/white thermoplastic traffic stripes and pavement marking material shall be properly collected, stored, transported, and disposed of in accordance with State and Federal guidelines. **Minimization:** If the proposed Build Alternative is selected, then a Phase I Environmental Site Assessment (ESA) and a Phase II Site Investigation (SI) will be prepared. **Avoidance:** A comprehensive ADL site investigation will be performed in Plans Specifications and Estimates phase.
Air Quality	Air quality will worsen if this alternative is chosen.	Potential fugitive dust emissions, construction equipment, dust, vehicles idling because of traffic congestion during construction, windblown particulates, disturbance of naturally occurring asbestos. Operational impacts are not anticipated. Air quality is likely to	**Minimization:** Compliance with Caltrans' Standard Specifications in Section 14 (2010) will be required. **Minimization: Section** 14-9.01 specifically requires compliance with all applicable laws and regulations related to air quality. **Minimization:** If dust palliative materials other than water are to be used, material specifications are contained in Section 18. **Minimization:** Apply water or dust palliative to the site and equipment as frequently as necessary to control fugitive dust emissions. **Minimization:** Spread soil binder on any unpaved roads used for construction purposes, and all project construction parking areas. **Minimization** Wash off trucks as they leave the R/W as necessary to control fugitive dust emissions. **Minimization:** Properly tune and maintain construction equipment and vehicles. **Minimization:** Develop a dust control plan. **Minimization:** Locate equipment and materials storage sites at least 500 feet from the

Resource Area	Potential Impacts Alternative: 1-No Build	Potential Impacts Alternative 2: Build	Avoidance, Minimization, and/or Mitigation Measures
		improve due to the improved circulation of traffic.	sensitive receptors. **Minimization:** Establish environmentally sensitive areas (ESAs) or their equivalent at least 500 feet away from sensitive air receptors within which construction activities when feasible. **Minimization:** 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. **Minimization:** Cover all transported loads of soils and wet materials prior to transport. **Minimization:** Promptly and regularly remove dust and mud that are deposited on paved public roads due to construction activity. **Minimization:** Route and schedule construction traffic to avoid peak travel times as much as possible. **Minimization:** Install mulch or plant vegetation as soon as practical after grading to reduce windblown particulates in the area. **Minimization:** While unlikely, if naturally occurring asbestos, serpentine, or ultramafic rock is discovered during grading operations, Section 93105, Title 17 of the California Code of Regulations requires notification to the SCAQMD by the next business day and implementation of specific measures within 24-hours to stabilize unpaved areas.
Noise and Vibration	No Impact	Potential construction noise from construction equipment, pile driving activities, and ground vibration. No operational impacts are anticipated; noise levels will be similar to current condition.	**Avoidance:** Equipment Noise Control will be applied to revising old equipment and designing new equipment to meet acceptable noise levels. **Minimization:** In-Use Noise Control where existing equipment is not permitted to produce noise levels in excess of specified limits. **Minimization:** Site Restrictions is an attempt to achieve noise reduction through modifying the time, place, or method of operation of a particular source. Site restrictions should be applied to achieve noise reduction through different methods, resulting in an immediate reduction of noise emitted to the community without requiring any modification to the source noise emissions. **Minimization:** Shielding with barriers should be implemented at an early stage of a project to reduce construction equipment noise. The placement of barriers must be carefully considered to reduce limitation of site access. Barriers may be natural or man-made, such as excess land fill used as a temporary berm strategically placed to act as a barrier. **Minimization:** Personal Training of operators and supervisors is needed to become more aware of the construction site noise problems. Educating contractors and their employees to be sensitive to noise impact problems and noise control methods. **Minimization:** Pile driving can be the most significant source of vibration at construction sites. The principal means of reducing vibration from impact pile driving that will most likely be used in this case will be cast-in-place or auger cast piles.

Resource Area	Potential Impacts Alternative: 1-No Build	Potential Impacts Alternative 2: Build	Avoidance, Minimization, and/or Mitigation Measures
Natural Communities	No Impact	No Impact	None
Animal Species	No Impact	Potential impacts to birds during bird nesting season.	**Avoidance:** Avoid construction during bird nesting season, or at a minimum grub the vegetation outside the bird nesting season (March 1st through September 1st). If this cannot be done, then a biological survey for nesting birds will be required.
Cumulative Impacts	No Impact	No Impact	None

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Chapter 1 Proposed Project

1.1 Introduction

The California Department of Transportation (Caltrans) is the lead agency under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The lead agency is defined as the public agency that has the principal responsibility of approving a project that is subject to CEQA and NEPA. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

California participated in the "Surface Transportation Project Delivery Pilot Program" (Pilot Program) pursuant to 23 USC 327, for more than five years, beginning July 1, 2007, and ending September 30, 2012. MAP-21 (P.L. 112-141), signed by President Obama on July 6, 2012, amended 23 USC 327 to establish a permanent Surface Transportation Project Delivery Program. As a result, the Department entered into a Memorandum of Understanding pursuant to 23 USC 327 (NEPA Assignment MOU) with FHWA. The NEPA Assignment MOU became effective October 1, 2012, and was renewed on December 23, 2016 for a term of five years. In summary, the Department continues to assume FHWA responsibilities under NEPA and other federal environmental laws in the same manner as was assigned under the Pilot Program, with minor changes. With NEPA Assignment, FHWA assigned and the Department assumed all of the United States Department of Transportation (USDOT) Secretary's responsibilities under NEPA. This assignment includes projects on the State Highway System and Local Assistance Projects off of the State Highway System within the State of California, except for certain categorical exclusions that FHWA assigned to the Department under the 23 USC 326 CE Assignment MOU, projects excluded by definition, and specific project exclusions.

Route 110 consists of State Route 110 (SR-110) and Interstate 110 (I-110). The entire length of I-110 (which ends at I-10), as well as SR-110 south of the four level interchange with US-101, is the Harbor Freeway, and SR-110 north from US-101 to Pasadena is the historic Arroyo Seco Parkway, the first freeway in the western United States. I-110 passes through or is adjacent to the cities of Los Angeles, Gardena, and Carson, and the unincorporated communities of Willowbrook and West Compton, and is a north-south transportation corridor connecting the South Bay cities with Los Angeles' central business district. The majority of I-110 runs through the Harbor Gateway, a north-south strip of land annexed by the City of Los Angeles that connects the City to the port complex of Los Angeles and Long Beach, as well as to the communities of San Pedro and Wilmington.

The Harbor Transitway is an 11-mile shared-use bus corridor (transitway) and high-occupancy toll roadway that runs in the median of Interstate 110. The Metro Silver Line bus rapid transit line runs on the Harbor Transitway from Harbor Gateway Transit Center to Downtown Los Angeles and continues to El Monte Bus Station. Other Metro bus and municipal bus routes also operate on the Harbor Transitway and they include: Metro Express 442, 450, 460 and 550,Torrance Transit: 4,Gardena Transit: 1X and Orange County Transportation Authority (OCTA): 701, 721. Busway bus lines originate from Downtown Los Angeles and El Monte, with final destinations in Anaheim, Buena Park, Artesia, Fullerton, Gardena, Hawthorne, Huntington Beach, San Pedro, and Torrance.

There are six transit stations on the main section of the Harbor Transitway: 37th St. Station, Slauson Station, Manchester Station, Harbor Freeway/I-105 Station, Rosecrans Station and Harbor Gateway Transit Center to one side of the I-110. All of these 6 stations are branded as Metro Silver Line stations. There are two additional stations on the I-110 to the south of the Transitway's terminus: Carson Station and Pacific Coast Highway station. Carson is a station on the Harbor Transitway at its undercrossing of Carson St. in the City of Carson. It is one of two that are outside of a dedicated transitway, the other being Pacific Coast Highway station. North of this station, transitway services use Torrance Blvd. and Figueroa St. to the Artesia Transit Center. Traveling south on the I-110, the next station is Pacific Coast Highway, which is located at 1424 Figueroa St. Both of these stations are served by Metro Express Line 450. These stations are not considered part of the Harbor Transitway stations nor are they Metro Silver Line stations. Carson and Pacific Coast Highway stations are considered freeway stations.

In 2010, the Harbor Transitway underwent a conversion from High-Occupancy Vehicle (HOV) lanes to High-Occupancy Toll (HOT) lanes, known locally as the I-110 Express Lanes. Motorists (both single-occupant and high-occupancy vehicles) may only access the lanes if they possess a FasTrak transponder and pay the appropriate tolls. Transit buses may also utilize the HOT lanes. The HOT Lanes operate by utilizing principles of dynamic pricing. Dynamic pricing provides the opportunity to "sell back" some of the additional capacity in the high-occupancy lanes to single occupant vehicles. The toll rate reflects traffic conditions at the time, aiming to maintain a 45 mile-per-hour minimum travel speed in the HOT lanes. Adams Blvd. is the terminus of the HOT lane facility, approximately one half mile south of downtown Los Angeles. In order to complete their trip, HOT lane users must navigate two congested signalized intersections (the I-110 off-ramp/Adams Blvd. and Adams Blvd./Flower St.) in order to reach the main downtown thoroughfare (Figueroa St.). This results in queuing at the off-ramp and HOT lane mainline. Bypassing these bottleneck intersections would eliminate or alleviate queuing and improve the operation and safety of the HOT lane facility and off-ramps.

1.2 Purpose and Need

Purpose

The purpose of the project is to alleviate congestion and reduce the queuing and delay on the managed HOT lanes, Adams Blvd. off-ramp, and associated nearby intersections. The project would improve traffic flow in a congested area of downtown Los Angeles by removing traffic from congested and confusing intersections.

Need

The current termination of the northbound I-110 HOT lanes at Adams Blvd. presents a particularly challenging bottleneck, as approximately half of the HOT lane traffic exits here to access downtown Los Angeles via Figueroa St., which affects the nearby intersections of Flower St. & Adams Blvd. and Northbound I-110 HOT off-ramp to Adams Blvd. The existing Northbound HOT lane at Adams Blvd. is a concentrated accident location, which is a safety concern. According to the Traffic Accident Surveillance and Analysis System (TASAS), and the Transportation Systems Network (TSN) reports, the accident rate at this location between October 1, 2010 and September 30, 2013 is 0.23, slightly higher than the average accident rate, which is 0.21. Accident rates are expressed as number of accidents fatal plus injury divided by million vehicle miles. The accident rate considers driving conditions, and if there were any injuries or fatalities. The vehicles currently existing NB HOT lane off-ramp approach queues onto the mainline which potentially causes an increase in rear end collision type of accidents.

The Traffic Study Report Addendum (April 2015) detailed intersection capacity and operation analyses in order to analyze the existing condition. Four key intersections were evaluated in the vicinity of the project site for weekday AM (7:30 to 9:30AM) and PM (5:00 to 7:00 PM) peak hours. All study intersections were analyzed using the Highway Capacity Manual (HCM) as well as the Transportation Research Board, 2000 methodology, which is the Caltrans and Federal Highway Administration (FHWA) adopted analysis methodology. Two of the analyzed key intersections and the existing northbound off-ramps at Adams Blvd. are currently operating at unacceptable levels of service during analyzed peak hours. Per HCM guidance, unacceptable Level of Service (LOS) “F”, can be described as the average delay per vehicle in seconds at a signalized intersection is more than 80 seconds, and for un-signalized the delay is more than 50 seconds. Queuing and congestion is currently experienced on both the off-ramp and the HOT lanes themselves. Increasing capacity at this location is the key to ensuring the HOT lanes can manage delay and serve additional users.

1.3 Independent Utility and Logical Termini

Independent utility is a term used to describe a project that would be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made. Once built, the project could stand on its own and requires no other projects to be implemented. The proposed project would help to lessen the congestion in this area without the implementation of any other nearby project.

A logical terminus describes logical beginning and end points for an improvement project, including the beginning and end points of its impacts. In the case of this project, many of the vehicles traveling the HOT lanes on the Transitway exit on Adams Blvd. in order to access Figueroa St. The project would allow those vehicles to bypass the congested intersections and exit the HOT lane facility directly onto Figueroa St. Those looking to exit at Adams Blvd. would still be able to do so. The project would not require future construction to use the project's design capabilities fully and meet the purpose and need. The proposed project has been designed 1) to connect logical termini, 2) to have independent utility or independent significance, and 3) not to restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

Therefore, based on the above and pursuant to 23 CFR 771.111(f), this project has independent utility and logical termini.

1.4 Project Description

Caltrans, in cooperation with Metro, proposes to construct an elevated off-ramp structure on the NB I-110 between 30th St. and Figueroa St. Overcrossing in the City of Los Angeles. Refer to Figure 1 for a project location map. The proposed structure would bypass the bottleneck intersections at Flower St. and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa St. (see Figure 2 for a project study area map). The structure would be approximately 1400 feet in length with two standard lanes (twelve feet in width) and a four-foot left shoulder as well as eight-foot right shoulder will be provided. All new structures will be within State right of way; minimal right of way acquisition will be required for maintenance, ingress/egress, access control, and setback purposes as well as emergency services access. The project is being planned in coordination with the City of Los Angeles' My Figueroa Project (MyFig Project), on Figueroa St. Figure 3 shows the proposed project features. A study area encompasses the area in which primary, direct, and/or secondary socioeconomic impacts associated with the project are likely to occur at their greatest intensity. The study area boundaries are West Washington Blvd to the north, 30th St. to the south, Hoover St. to the west, and South Grand Ave. to the east. The study area falls into two City of Los Angeles Community Plan Areas: the South and Southeast Los Angeles Community Plans.

Figure 1: Project Location Map

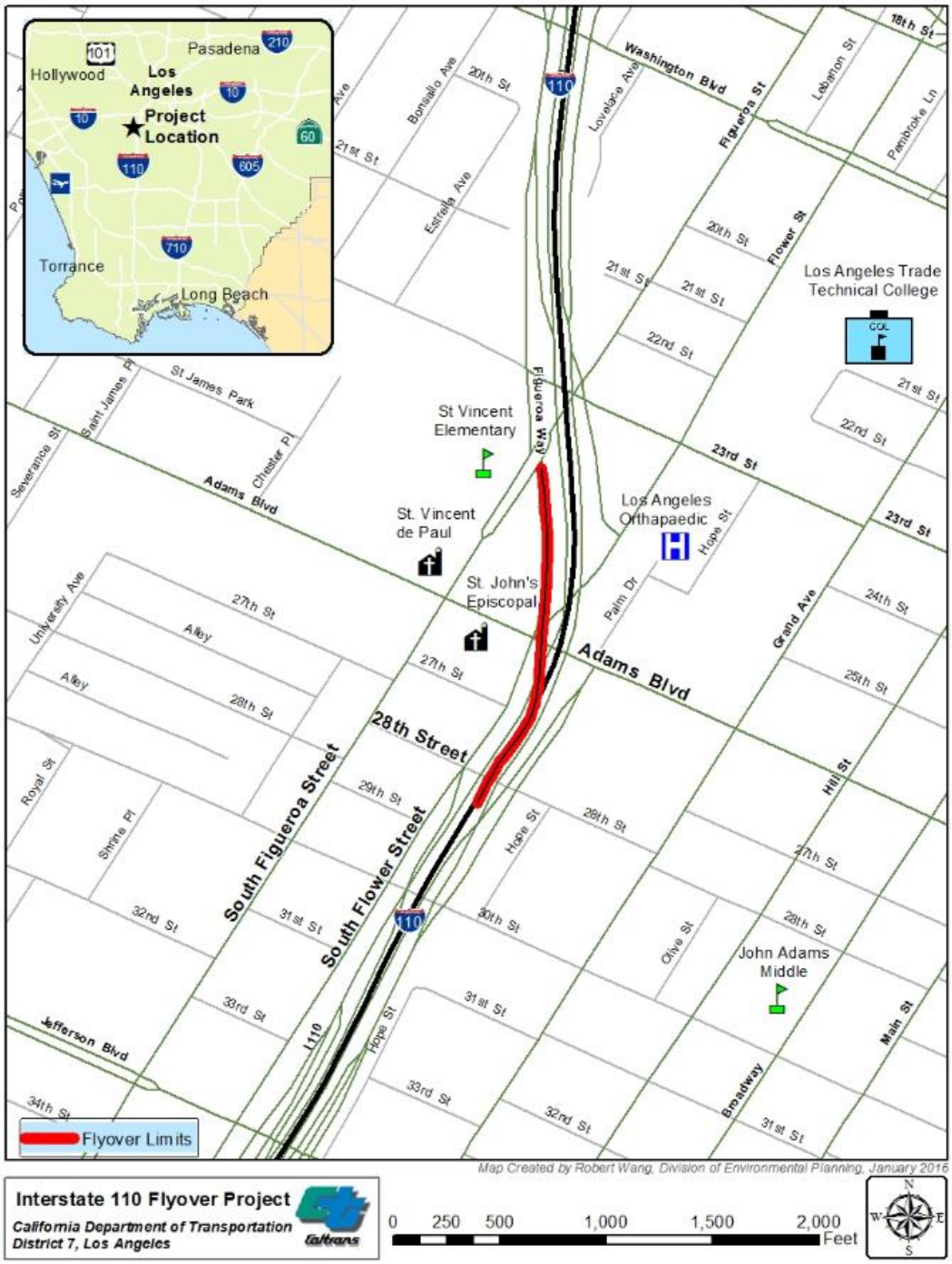


Figure 2: Project Study Area Map

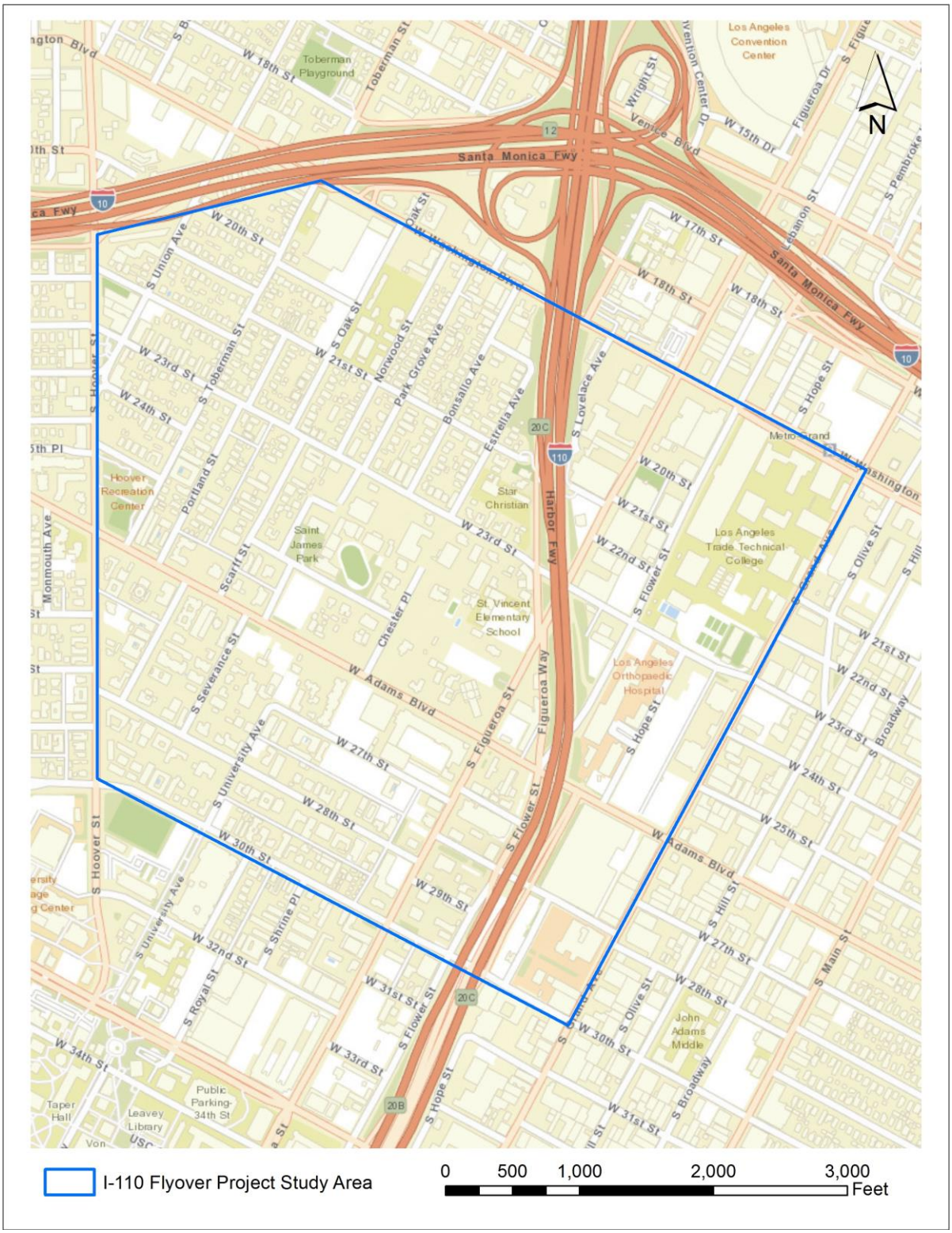
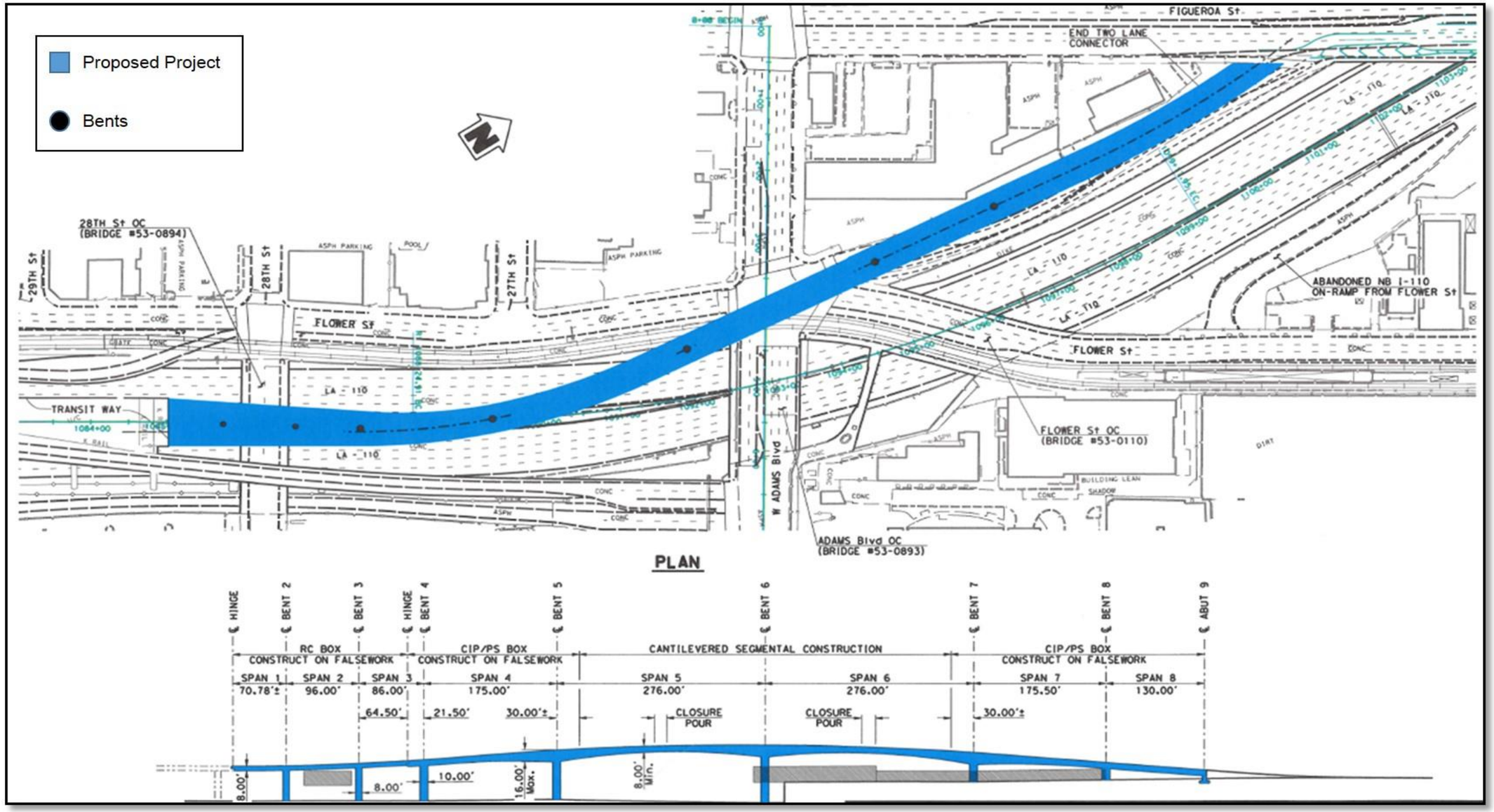


Figure 3: Proposed Project Features Map



Source: Caltrans Structures Unit (January 2016)

1.5 Project Alternatives

Alternative 1 (No-Build Alternative):

The No-Build Alternative proposes no physical improvements to the current freeway structures, and would maintain the current configuration of the existing freeway, transitway and off-ramps. Only approved and planned projects included in SCAG's 2015 Regional Transportation Plan (RTP) are considered part of Alternative 1. The existing conditions at the time of beginning environmental studies are used as a baseline for California Environmental Quality Act (CEQA), and the No-Build Alternative is used as a baseline for the National Environmental Policy Act (NEPA).

Alternative 2 (Build Alternative):

This alternative proposes a two-lane flyover off-ramp connector structure (approximately 1,400 feet in length). The structure will connect from the end of the existing viaduct (the Harbor Transitway) and land at the existing Figueroa Way. Two standard lanes (12 feet in width) will be provided, with a four-foot left shoulder and eight-foot right shoulder. New column/bent locations will be located at Figueroa Way and in the I-110 mainline. Utilities are not anticipated to be impacted by the proposed project and no utility relocations are anticipated. Please refer to Figure 4: Design Concept 1 for a conceptual design of the proposed Build Alternative. The cost associated with this alternative is approximately $43 million.

Construction of the build alternative may include the following associated work:

- Minimal right of way would be acquired at the westerly side of the project for maintenance, ingress/egress, access control, and setback purposes
- Removal of existing and delineation of new traffic stripes and/or pavement marking (yellow thermoplastic stripes, white thermoplastic stripes, and pavement markers)
- Upgrade or replace existing roadside signs, modify/add overhead signs for Figueroa St. exit
- Signal upgrade/modification (off-ramp terminus at Figueroa St. intersection)
- Lighting upgrade/modification
- Drainage improvements/updates
- Utility relocation (if needed)
- Landscape work

Design features of the proposed project will meet/satisfy FHWA multimodal goals/visions and Caltrans Complete Street Deputy Directive by ensuring the safety of pedestrians, bicyclists, and motorists. The project design features include upgrading and/or replacing road signs, lighting, and landscape work to improve safety for users. A Traffic Management Plan (TMP) will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall include the following implementation plans: public information, motorist information, incident management, and traffic management during construction. Further, as a result of the proposed project a re-design of Figueroa Way to encourage pedestrian and bicycle use will occur.

Context sensitive solutions have been considered and will continue to be considered as the proposed project moves into the design phase of the project. As stated in the Visual Impact Assessment (April 2015), the elevated structure will be constructed of concrete and its form defined by crisp lines. Further, the use of texture on the outer bridge railing will be explored in the structure design phase. It is anticipated that the structure color itself will be natural concrete gray. This will match the existing structure. If color is to be used it would be in the way of possible light post or fencing, which will also be explored in the design phase. The composition of the structure and associated facilities will promote a uniform appearance with the existing structure and roadway. Another context sensitive element of the proposed project is to design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the West Adams community.

Summary of Decision-Making Process and Preferred Alternative:

The Project Development Team has carefully weighed the entire public comment record, all relevant data, technical studies, potential environmental impacts, avoidance measures, minimization measures, and mitigation measures. As a result of evaluating all relevant materials, Caltrans has selected Alternative 2 as the preferred alternative because:

- Alternative 2 has the smallest project impact footprint of any possible Build Alternative considered, and would result in the least overall harm
- Alternative 2 would result in the best operational improvements as well as congestion relief for both mainline and local streets
- With the implementation of the proper avoidance, minimization, and/or mitigation measures any potential environmental impacts will be less than significant

Figure 4: Potential Design Concept 1

Source: Caltrans Headquarters Bridge Aesthetics Unit

1.6 Alternatives Considered but Eliminated from Further Discussion

This section includes all alternatives that were considered during the project development process, but were eliminated from further consideration, and the reason for rejection.

A Value Analysis (VA) study, sponsored by Caltrans District 7 and facilitated by Value Management Strategies, Inc., was conducted for the project in January 2013 in the District 7 offices.

The objectives of the VA study were to:

- Review project operational features: benefit to the mainline operations and to the City of Los Angeles roadway network
- Assist in screening alternatives for the Environmental Document
- Review the feasibility and constructability of the future HOT lane extension north.
- Review traffic impacts during construction
- Review cost and schedule improvements

Alternative 2A: Two-lane Flyover Off-ramp. This alternative would convert the existing I-110 Hot off-ramp/Adams Blvd. into two exclusive right turn lanes, designated southbound Flower St. left-turn movement onto Adams Blvd. traveling eastbound would be eliminated. This alternative also includes converting Figueroa St. bus lane to bus and HOT lane. Eastbound Adams Blvd. would be tapered off (two lanes) to southbound Flower St. (Adams Blvd. eastbound segment between Flower St. and NB off-ramps would be closed to traffic). The signal would still remain at the Adams Blvd./Flower St./Figueroa Way/Light Rail Train (LRT) intersection.

Reason for Rejection: This alternative was rejected due to the impacts and limitations on local streets.

Alternatives 2B: Two-lane Flyover Off-ramp Plus Eastbound Adams Blvd. Converted. This alternative is identical to Alternatives 2A except eastbound Adams Blvd. from the mainline off-ramp would be converted into a one-way eastbound direction.

Reason for Rejection: This alternative was rejected due to the impacts and limitations on local streets.

Alternative 3: Extension of the Existing 1-110 Viaduct and a One lane HOV off-ramp to Figueroa Way. This alternative includes two elevated structures. The extension of the viaduct (885 feet in length) from the end of the existing I-110 Transitway to approximately 105 feet north of the Adams Blvd. OC, and one-lane fly-over structure (646 feet in length), coming off the proposed viaduct extension and landing at the existing expressway, which is done to bypass the existing at grade bottleneck intersections (The Harbor Transitway/Adams Blvd. & Adams Blvd./Flower St.). This alternative would involve additional roadway widening on the I-110 mainline and replacement of the Adams Blvd. overcrossing, Flower St. overcrossing, partial replacement of the Flower St. overhanging structure, mainline retaining wall reconstruction, utility relocation, and construction of a temporary bridge structure to keep the Expo Line open during construction.

Reason for Rejection: The estimated project cost would be $100-125 million. Additional roadway widening on the I-110 mainline between 28th St. and Figueroa St. would be needed. The portion of the Expo Line on Flower St. would be impacted and the replacement of the portion of Flower St. would be needed. Additional right of way acquisition would be needed, at an estimated cost of $100,000 - $580,000. Impacts to local structures, nearby light rail transit line, utilities, and mainline I-110 would be extremely expensive.

Alternative 4: Extension of the Existing I-110 Viaduct and a One-lane HOV Off-ramp to the Intersection of 23rd St. & Figueroa St. This alternative includes two elevated structures: The extension of the viaduct (1,060 feet in length) from the end of the existing I-110 Transitway to 480 feet north of the Adams Blvd. OC, and one-lane fly-over structure (1,040' in length), coming off the side of the proposed viaduct extension and entering at the southwest corner of the intersection of Figueroa St. and 23rd St., to bypass the existing at grade bottleneck intersections (The Harbor Transitway/Adams Blvd. & Adams Blvd. /Flower St.).

Reason for Rejection: The estimated project cost would be $130-165 million. Additional roadway widening on the I-110 mainline between 28th St. and Figueroa St. would be needed. The portion of the existing LRT on Flower St. would be impacted and the replacement of the portion of Flower St. would be needed. Additional right of way acquisition would be needed, and the estimated right of way for this alternative would be $100,000 -580,000.

Alternative 5: East Side Flyover. This alternative, Alternative 1.1 in the VA Study Report, proposed a two-lane flyover off-ramp structure from the northbound terminus of the Transitway that would bypass the existing at-grade congested intersections (northbound Transitway off-ramp/Adams Blvd. and Adams Blvd./Flower St.). The structure would be located on the east side of the freeway and touch down at the existing intersection of 23rd and Figueroa Streets.

Reason for Rejection: This alternative would require significant changes and result in significant impacts to the 23rd/Figueroa Streets intersection. The resultant five-way intersection would operate at a Level of Service F, with motorists encountering a delay of approximately 8 minutes before entering the intersection. This alternative would also involve the construction of an elevated structure prohibitively close to the Los Angeles Orthopedic Medical Center, located at 2400 South Flower St., and right of way would be required.

Alternative 6: Adams Blvd. Off-ramp Widening. This alternative, Alternative 1.2 in the VA Study Report, this alternative would widen the existing right-side HOT lane off-ramp to Adams Blvd. to make it a two-lane exit configuration at the nose in lieu of the one-lane condition in the current configuration for the HOT off-ramp. This alternative would also create left turns on the off-ramp with the No. 4 lane an either/or (right turn/left turn). In order to receive the four left-turn lanes on westbound Adams Blvd., the following revisions are required to the five-lane section as currently exists on the northbound Adams Blvd. lanes:

- left-turn lane
- 2 through lanes [with the No. 2 through lane an either/or (straight/right turn)]
- 2 trapped off lanes to Figueroa Way

The widening of the HOT off-ramp will require that the mixed-flow off-ramp to Adams Blvd. be shifted out to accommodate the space required by the HOT off-ramp structure widening. The shift in the mixed-flow lanes will require that the northwest corner of the parking structure be impacted. I-110 off-ramp/Adams Blvd. will be converted into a
T-intersection with HOT lane traffic only turning left (westbound) and mixed-flow traffic headed either westbound or eastbound only, which will be removed to allow free flow traffic onto Adams Blvd. Westbound Adams Blvd. starting at the off-ramp intersection will be westbound to Grand Ave. Eastbound Adams Blvd. will be trapped off (two lanes) to southbound Flower St. The signal will still remain at the Adams Blvd./Flower St./Figueroa Way/LRT intersection. A subset of this alternative was to retain the eastbound Adams Blvd. through movement across Flower St.

Reason for rejection: Northbound HOT traffic does not bypass the two intersections (I-110 off-ramp/Adams Blvd. and Adams Blvd./Flower St./Figueroa Way/LRT intersection), Right of way impacts to the parking structure, and the City network is changed significantly with out-of-direction travel.

Alternative 7: Adams Blvd. Off-ramp Widening and Mixed Flow Off-ramp Reconfiguration. This alternative was initially proposed as Alternative 1.3 in the VA Study Report. It proposes to widen the existing northbound Adams Blvd. HOT lane off-ramp on the right side to create a two-lane exit configuration at the nose in lieu of the one-lane current condition. This would create four turning lanes onto Adams Blvd. from the off-ramp: one exclusive left-turn lane, two exclusive right-turn lanes, and the number two lane an optional right or left turn. I-110 northbound mixed flow off-ramp would be reconfigured to right-turn only lanes onto eastbound Adams Blvd, which would become a one-way street in the eastbound direction to Grand Ave. The I-110/Adams Blvd. terminus will be an un-signalized intersection at Adams Blvd./off ramp feeding Adams Blvd. eastbound (only) and Adams Blvd. westbound (only) for traffic exiting the off-ramp. The off-ramp traffic will be provided two HOT left turns to Adams Blvd. westbound and five HOT/mixed-flow right turns to eastbound Adams Blvd. (total of six lanes at the terminus as one of these is an either/or lane). The five eastbound receiving lanes on Adams Blvd. will converge to one either/or (through or right) and three left turn lanes turning onto northbound Grand Ave. Grand Ave. will be converted to four northbound-only traffic lanes between Grand Ave. and Washington Blvd. At Washington Blvd., the existing one-way South Grand Ave. will also need to be converted to northbound.

Reason for Rejection: This alternative would significantly impact the operations of the intersections of Figueroa St./Adams Blvd., which would operate at a Level of Service F. Additionally, southbound regional traffic flow would be impeded. Northbound HOT traffic does not bypass the two intersections (I-110 off-ramp/Adams Blvd. and Adams Blvd./Flower St./Figueroa Way/LRT intersection), right of way impacts to the parking structure, and the City network is changed significantly with out-of-direction travel

Alternative 8: Increase Figueroa St. capacity by eliminating the 23rd St./Figueroa St. signals. This alternative was initially proposed as Alternative 2.1 in the VA Study Report. The alternative proposes to eliminate the 23rd St./Figueroa St. signals. At the 23rd St./Figueroa St. intersection, eliminate 23rd St. access across Figueroa St. with right-only movement from northbound and southbound Figueroa St. to 23rd St..

Reason for Rejection: This alternative constrains the City of Los Angeles' MyFig project, which will be redesigning the Figueroa Corridor into a complete, multimodal street that better serves the needs of pedestrians, bicyclists, and transit riders, while accommodating drivers. This alternative constrains MyFig Project particularly as the MyFig project disperses Figueroa St. traffic to the surrounding city network. This dispersion creates a need to retain the existing access at 23rd, 22nd, 21st, and 20th Streets and the access afforded by the two-way left-turn lane (TWLTL).

Alternative 9: Increase HOT lane merge capacity and Figueroa St. capacity by limiting access from 23rd St. to 20th St. This alternative was initially proposed as Alternative 2.2 in the VA Study Report. This alternative proposes to shift the northbound Figueroa Street's three lanes into the location of the existing TWLTL/ left-turn pockets. This shift provides the space to bring on two exclusive Figueroa Way right-turn lanes onto Figueroa St. Eliminate the 23rd St./Figueroa St. signalized intersection and the TWLTL between 23rd and Washington Blvd. (with the left turn at Washington Blvd. retained). Revise the 23rd St./ Figueroa St. intersection to restrict 23rd St. access across Figueroa St. with right-only movement off northbound and southbound Figueroa St. into 23rd St.

Reason for Rejection: This alternative constrains the MyFig project, particularly as the MyFig project disperses Figueroa St. traffic to the surrounding city network. This will require the access between 23rd and 20th Streets for this dispersion. This alternative limits the access from/to Figueroa St. and 23rd St. and subsequent three intersections (22nd, 21st, and 20th Streets) and the access afforded by the TWLTL, changes in the traffic circulation patterns of 23rd, 22nd, 21st, and 20th Streets with out-of direction implications, and impacts pedestrian crossing at Figueroa St. and 23rd St.

Alternative 10: Increase Figueroa St. capacity by creating a reversible lane on Figueroa St. to Washington Blvd. This alternative was initially proposed as Alternative 2.3 in the VA Study Report. This alternative would create a reversible lane in the median of Figueroa St. that would provide five lanes north starting at Figueroa Way, north to Washington Blvd. During off-peak periods there would be four lanes north of Figueroa Way. Allow the two Figueroa Way lanes to join Figueroa St. with two free right turns during peak periods by shifting the No. 1 lane to the location of the left-turn pockets/median. This will require the removal of the hardscape features of the median/left-turn lanes with a painted TWLTL that occupies the median in order to allow the left turns to be in place off peak and the addition of the through lane (north of Figueroa Way to Washington Blvd.). The free right would be two lanes from Figueroa Way to Figueroa St. at all times. Signals that support use of the left turn for off-peak period/the additional through lane during peak periods would need to be installed.

Reason for Rejection: This alternative constrains the MyFig project, particularly as the MyFig project disperses Figueroa St. traffic to the surrounding city network. This will require the access between 23rd and 20th St. for this dispersion. This alternative can be pursued at a later date if the MyFig project is eliminated. This alternative disallows left-turn movements and changes the traffic circulation patterns of 23rd, 22nd, 21st, and 20th Streets. Impacts to pedestrian crossing at Figueroa and 23rd Streets during peak periods may occur. Increases in potential collisions caused by the changes in the use of the median during peak and non-peak period is likely to occur.

Alternative 11: Transportation System Management and Transportation Demand Management Alternative. Transportation System Management (TSM) strategies consist of actions that increase the efficiency of existing facilities; they are actions that increase the number of vehicle trips a facility can carry without increasing the number of through lanes. Examples of TSM strategies include ramp metering, auxiliary lanes, turning lanes, reversible lanes, and traffic signal coordination.

Transportation Demand Management (TDM) encourages public and private transit, ridesharing programs, and bicycle and pedestrian improvements as elements of a unified urban transportation system. TDM addresses traffic congestion by reducing travel demand rather than increasing transportation capacity and focuses on alternatives such as ride sharing, flextime, increased transit usage, walking, and bicycling. TDM focuses on regional strategies for reducing the number of vehicle trips and vehicle miles traveled and increasing vehicle occupancy. It facilitates higher vehicle occupancy or reduces traffic congestion by expanding the traveler's transportation choice.

Reason for Rejection: Because TSM strategies currently are employed in the project area (HOT and auxiliary lanes) and traffic congestion is still prevalent, TSM measures alone will not address the existing capacity deficiency of the current conditions. Multi-modal alternatives integrate multiple forms of transportation, such as pedestrian, bicycle, automobile, rail, and mass transit. Because a range of transportation options is currently available in the project area and traffic congestion is still prevalent, multi-modal alternatives alone will not be adequate to meet the purpose of and need for the Proposed Project.

Table 2: Potential Permits and Approvals Needed

Permit/Approval	Approving Agency	Status/Timing
Construction General Permit (Order No. 2009-009-DWQ)	State Water Resources Control Board	Applicable documentation to be completed during the Plans Specifications and Estimates (PS&E) phase of the project
National Pollutant Discharge Elimination System	State Water Resources Control Board	Applicable documentation to be completed during the PS&E phase of the project
Encroachment Permit	City of Los Angeles	Applicable documentation to be completed during the PS&E phase of the project
Storm Drainage Connection Permit	Los Angeles County/City Department of Public Works	Applicable documentation to be completed during the PS&E phase of the project

Chapter 2 Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures

As part of the scoping and environmental analysis done for the project, the following environmental issues were considered, but no adverse impacts were identified. Therefore, there is no further discussion of these issues in this document.

- **Coastal Zone -**The project limits are outside the coastal zone, therefore, no adverse impacts are anticipated
- **Wild and Scenic Rivers-**The project limits are not near any wild and scenic rivers, therefore no adverse impacts are anticipated
- **Farmlands/Timberlands-** The project is located in an urbanized area and no farmlands/timberlands are near the project limits, therefore no adverse impacts are anticipated
- **Wetlands or Other Waters-** The project is located in an urbanized area and no wetlands or other waters are near the project limits, therefore no adverse impacts are anticipated
- **Hydrology and Floodplain-**No hydrology and/or floodplain issues have been identified within the project area, therefore, no adverse impacts are anticipated

2.1 Human Environment

2.1.1 Land Use

Existing and Future Land Use

Affected Environment

According to the Community Impact Assessment (August 2015), the project falls within two City of Los Angeles Community Plans (South Los Angeles Community Plan Area and Southeast Los Angeles Community Plan Area). Refer to Figure 5 for a map of South and Southeast Los Angeles Community Plans Study Areas. According to The South Los Angeles Community Plan (2012), the area is approximately 7,272 acres or roughly 15.4 square miles of land area and is located less than two miles southwest of Downtown Los Angeles. The Community Plan Area is generally 1.5 miles from west to east (between Arlington Ave. and Figueroa St.) and 8.5 miles from north to south (between Pico Blvd. and Century Blvd.), making it a relatively long and narrow Community Plan Area.

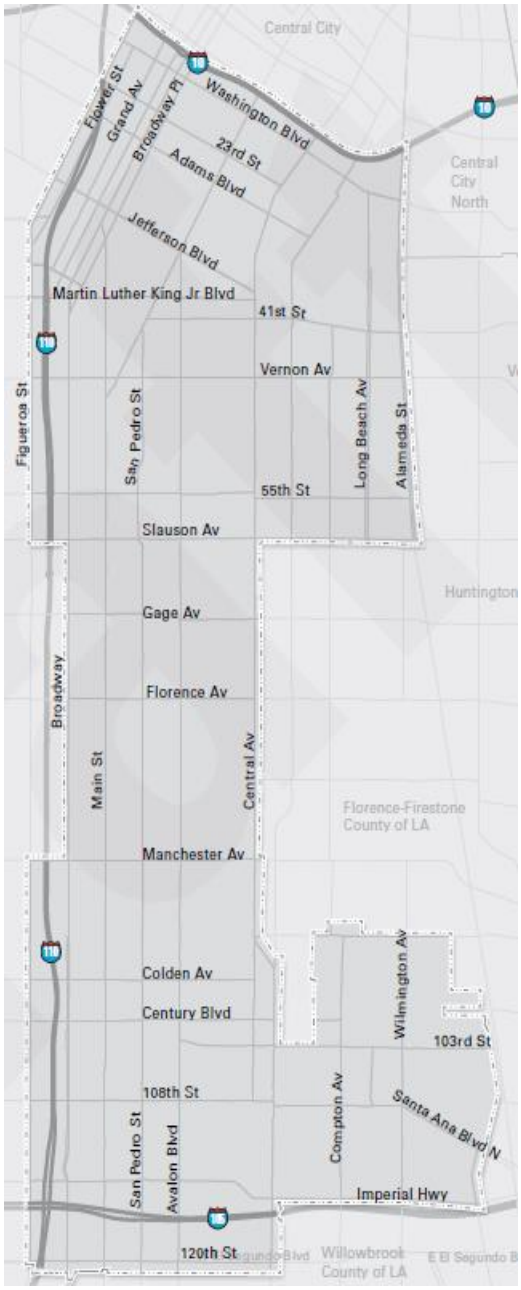
The South Los Angeles Community Plan Area is bounded by Pico Blvd. to the north, Figueroa St. and Broadway to the east, Century Blvd., 105th, 108th and 120th Streets to the south and Van Ness and Arlington Avenues to the west.

The Southeast Los Angeles Community Plan Area is bounded by the Santa Monica Freeway (I-10) to the north, Figueroa St. and Broadway to the west, 120th St. and Imperial Highway to the south, and Alameda St., Central Ave. and Mona Blvd. to the east.

Figure 5: South & Southeast Los Angeles Community Plans Study Area Maps

South Los Angeles Study Area

Southeast Los Angeles Study Area



Source: South Los Angeles and Southeast Los Angeles Community Plans

Figure 6: South Los Angeles Land Use Map

Source: South Los Angeles Community Plan; City of Los Angeles Planning Department

South Los Angeles Community Plan

The South Los Angeles Community Plan Area is comprised largely of residential land uses with 5,381 acres, or 74 percent, devoted to some form of housing (see Figure 6 South Los Angeles land use map). Of those 5,381 acres, nearly 30 percent of residential land is designated for single-family homes, and South Los Angeles contains many stable, low-density residential neighborhoods. Single-family residential uses are primarily located in the southern and western portions of the Community Plan Area, while multi-family residential uses are concentrated in the northern and eastern portions of the Community Plan Area. The majority of residential uses are located within the low and low medium I and II land use designations.

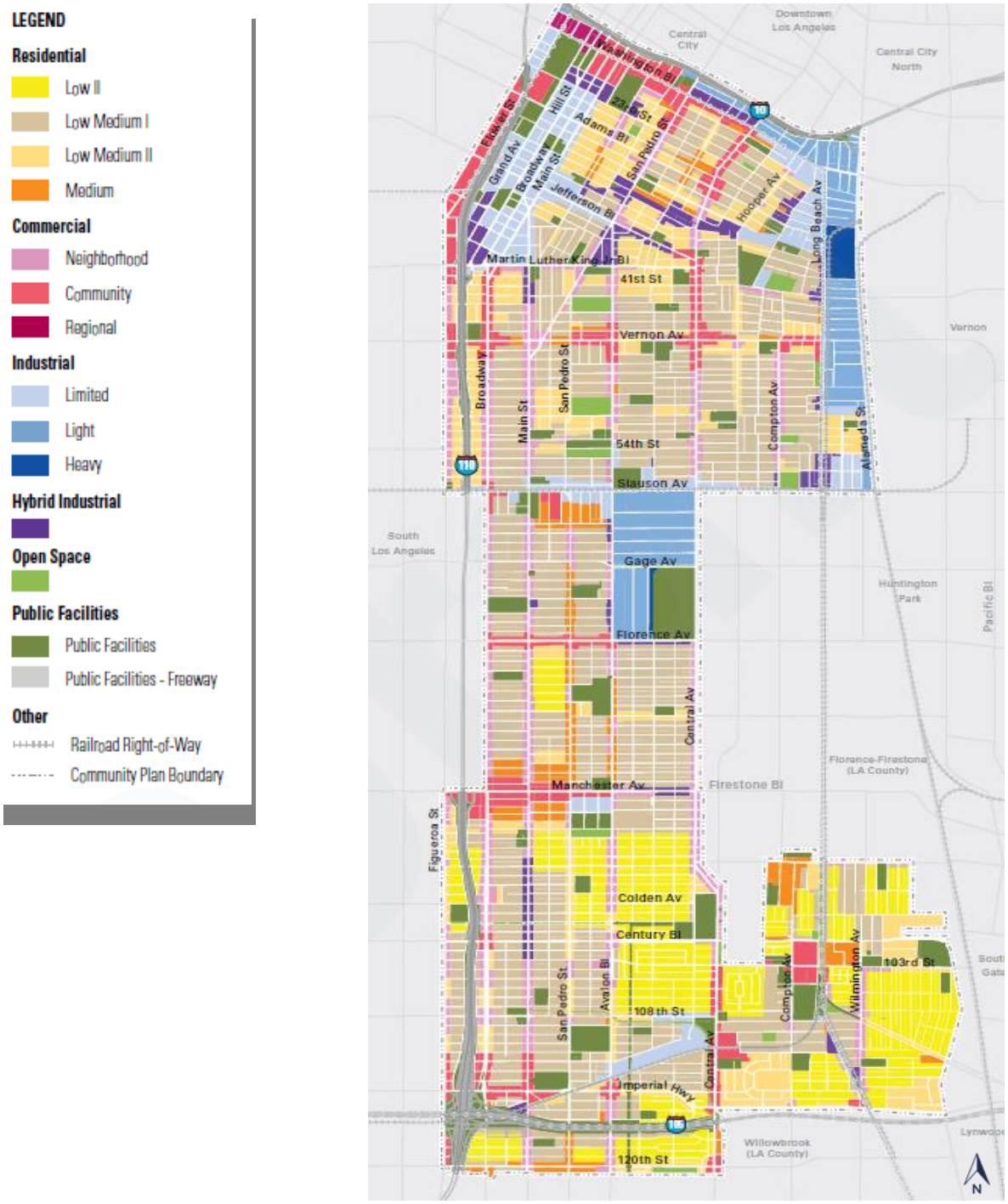
Surrounding the residential areas are commercial land uses, primarily located along the Community Plan Area's major corridors. Existing commercial land uses in South Los Angeles total approximately 863 acres, or 12 percent, of the community. Commercial uses are dispersed within the east-west and north-south major corridors along parcels designated neighborhood commercial, general commercial and community commercial. Uses along the corridors include a variety of low-rise retail, office, government or institutional buildings. South Los Angeles also contains a small portion of industrial land primarily consisting of commercial manufacturing and light and limited industrial uses. Industrial land uses comprise a total of 274 acres or almost 4 percent of the Community Plan Area. The majority of the industrial uses are within the light industrial land use designations. Limited and hybrid industrial uses can be found along portions of Washington Blvd., Venice Blvd., and Slauson Ave. Only one area, generally located near Western Ave. south of Slauson Ave. and north of Gage Ave., is designated as light industrial.

South Los Angeles is relatively parks-poor compared to the rest of Los Angeles and open space uses comprise a total of 296 acres or 4 percent of the South Los Angeles Community Plan Area. A variety of small and large-scale parks with different amenities, including sports facilities, playgrounds and passive green spaces, provide recreational opportunities for South Los Angeles residents.

Southeast Los Angeles Community Plan

According to the 2014 Draft Southeast Los Angeles Community Plan (Figure 7 Southeast Los Angeles Land Use Map), Southeast Los Angeles is an urbanized community that is nearly fully developed with few vacant land infill opportunities throughout the Plan Area. It has a predominantly level topography and is surrounded by major transportation infrastructure, including the I-110, I-10, and I-105 Freeways, as well as the Alameda Corridor and Metro Blue, Green, and Expo Lines. There are no major land formations or water ways that define the area. The Community Plan Area is developed with a mixture of multi-family and single-family residential, commercial, industrial, civic, recreational, and open space uses, encompassing approximately 7,300 acres.

Figure 7: Southeast Los Angeles Land Use Map



Source: Southeast Community Plan

Historically, the majority of the Plan Area was planned for residential purposes with the oldest neighborhoods generally located in the northern part of the Plan Area, and to a lesser extent in Watts. However, one can find buildings from the 1890s onward throughout the Community Plan Area. Residential uses comprise the largest portion of the Southeast Los Angeles community with 4,169 acres, or 57.1 percent, of the Community Plan Area designated for residential use. Over 78 percent of this residential land is designated for low to medium density multi-family uses. Southeast Los Angeles contains 12.4 percent land area designated for single-family uses, most of which is concentrated in the southern portion of the Plan Area. Accordingly, plan policies provide for the retention and preservation of existing residential neighborhoods throughout the Plan Area, and particularly single-family districts.

Commercial land uses comprise 924 acres, or 12.7 percent, of the Plan Area. These uses are generally concentrated along the north-south streets of Figueroa St., Broadway, Main St., San Pedro St., Avalon Blvd., Central Ave., Compton Ave., and Wilmington Ave. The east-west streets of Florence Ave. and Manchester Ave. are predominantly commercial while Martin Luther King Jr. Blvd. and Vernon Ave. have a mixture of commercial and residential uses. Traditional commercial development is undergoing a transition into an auto-oriented built form with new strip-mall type of development throughout many of the corridors. Industrial land uses comprise 884 acres, or 12.1 percent, of the Plan Area. Industrial land uses are primarily concentrated in the northern portion of the community with smaller industrial clusters in the mid and southern portion of the Plan Area. These areas provide a substantial number of jobs in the community and region. An additional 195 acres or 2.7 percent of the Plan Area is designated as hybrid industrial, which is a land use that provides for a combination of limited residential uses with compatible light industrial uses. This land use was previously named commercial manufacturing.

The Southeast Los Angeles Community Plan contains 130 acres or 1.8 percent of the Plan Area designated as open space. The open space land use designation encompasses the community's parks and recreational facilities. There is no undeveloped open space in Southeast Los Angeles. The current amount of open space does not meet City standards but due to the limited availability of undeveloped land, adding more open space facilities is difficult. Public facilities comprise 998 acres or 13.7 percent of the Plan Area. These facilities include schools, fire and police stations, utilities, and libraries. Schools represent the largest portion of the public facilities in Southeast Los Angeles with approximately 67 public schools in the Community Plan Area. There are 50 elementary schools, 12 middle schools, and 5 high schools.

Future Land Use

Regionally, development trends in the greater Los Angeles area are shifting from development of vacant lands to infill, redevelopment, and transit oriented development. According to the City's general plan, current land use policy encourages future development to occur in neighborhood districts, commercial and mixed-use centers, along boulevards, industrial districts, and in proximity to transportation corridors and transit stations. The goal of these policies is to create a healthier, more equitable, and more livable city. Land use policies for future development within unincorporated areas are geared towards the implementation of smart growth policies, environmental management, and provision of healthy and livable communities.

In addition to land use policy, transportation improvements within the greater Los Angeles area are focused on re-working the existing system and transitioning to a more transit-based system that will encourage transit-oriented development and improve area circulation and health for area residents.

According to Los Angeles Downtown News article "The Development Boom: Updates on 97 Downtown Projects" (February 24, 2014), "Downtown Development: Updates on 90 Projects" (May 19, 2015), "Downtown Development: The Latest Info on 96 Projects"(February 24, 2015), City of Los Angeles website, University of Southern California (USC) website, and the State Clearinghouse CEQA Database (July 2015) below Table 3 lists potential projects that are new projects in construction, and/or potential projects within/near the South and Southeast Los Angeles Community Plan Study Areas (refer to Figure 8 for a map of projects listed in Table 3. Table 4 lists future Caltrans maintenance projects on I-110.

Table 3: List of Potential Projects within/near South & Southeast Los Angeles Community Plan Areas

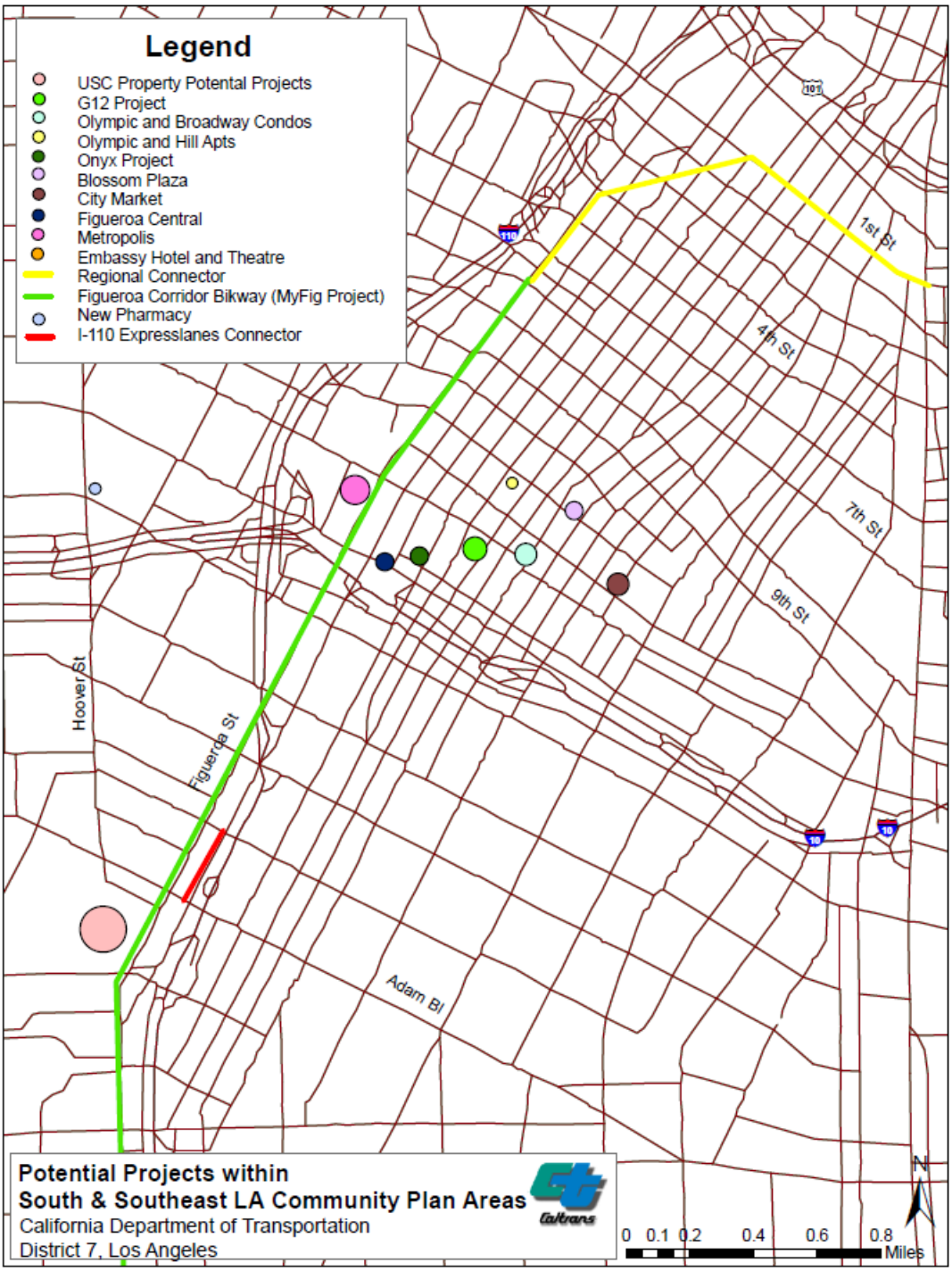
Name/Location	Jurisdiction	Proposed Uses	Status
1.) FIGUEROA CORRIDOR BIKEWAY (MyFig Project)/Figueroa Street from 7th Street in downtown Los Angeles to 41st Street, just south of Exposition Park; 11th Street from Figueroa Street east to Broadway in the South Park neighborhood of downtown Los Angeles; and Martin Luther King Jr. Boulevard from Figueroa Street west to Vermont Avenue, on the south edge of Exposition Park.	City of Los Angeles	Seeks to transform the Figueroa Corridor into a complete, multimodal street that better serves the needs of pedestrians, bicyclists, and transit riders, while still accommodating drivers.	Completion is anticipated in Spring 2018
2.) USC Owned Property/potential development	USC	New academic and administrative buildings, new mixed-use University Village, create pedestrian friendly area	To be determined
3.) G12 PROJECT/Three-acre site bounded by Twelfth and Olive streets, Pico Boulevard and Grand Avenue	Developer Sonny Astani and L&R Group	Residential complex with 640 units	Groundbreaking is yet to be determined
4.)OLYMPIC AND BROADWAY CONDOS/955 S. Broadway	Developer Barry Shy	A 15-story condominium complex; the 184,705-square-foot structure would bring 163 housing units and eight commercial spaces to the corner of Broadway and Olympic Boulevard	No timeline for construction has been revealed
5.) OLYMPIC AND HILL APARTMENTS/Olympic and Hill	Developer Hanover Company	281-apartment complex with seven floors of housing and 16,000 square feet of street-level retail	Completion is anticipated 2015
6.) ONYX Project/Pico Boulevard at Flower and Hope streets	Developer Jade Enterprises	The first of two buildings in the complex at Pico Boulevard at Flower and Hope streets will bring 162 apartments and 13,200 square feet of retail space. The seven-story Onyx is rising on two side-by-side parking lots atop a total of 42,000 square feet of retail and commercial space.	Completion is anticipated 2017
7.) BLOSSOM PLAZA/900 N. Broadway	Developer Forest City	Five-story Blossom Plaza will have 237 apartments (with 53 reserved for low-income residents), a 17,000-square-foot public plaza and a walkway connecting the Metro Gold Line station to Broadway in the heart of Chinatown.	Completion is anticipated in Spring of 2016
8.) CITY MARKET/Bounded by Ninth, San Pedro, San Julian and 12th streets,	City Market owner Peter Fleming	945 residential units, 210 hotel rooms, 225,000 square feet of retail and 295,000 square feet of creative office space. The first phase calls for transforming two aged buildings: One would hold 150 housing units and the other would be an office structure.	Completion is anticipated in 2034

9.) FIGUEROA CENTRAL/A 4.6-acre site immediately east of Staples Center	Beijing's Oceanwide Real Estate Group	Build the massive mixed-use Figueroa Central project on the property, with 45- and 33-story towers, 220 hotel rooms and additional retail space.	Completion is anticipated in 2018
10.) METROPOLIS/The 6.33-acre Metropolis site is bounded by the I-110 Freeway and Francisco, Eighth and Ninth streets	Greenland Group	Create two towers joined by a large public plaza. One will be a 38-story building with about 300 units while the other will be a 19-story hotel with 350 rooms.	Completion is anticipated in 2016
11.) REGIONAL CONNECTOR/Underground tunneling from Little Tokyo to the Financial District by way of Second Street, as well as a trench down Flower Street to Wilshire Boulevard.	Metro	Regional Connector that will connect a series of light rail lines, create three new stations, and streamline travel throughout the region.	Completion is anticipated in 2019
12.) EMBASSY HOTEL AND THEATRE/849 S. Grand Ave.	Chetrit Group	183-room hotel featuring an approximately 2,000-square-foot ground-floor restaurant, a 7,600-square-foot outdoor garden, a lobby bar and a lounge.	Completion is anticipated in 2015
13.) PHARMACY/Washington Blvd./Hoover St.	City of Los Angeles	New one-story 16,572 square feet retail pharmacy with 24 hour operation.	To be determined

Table 4: Caltrans Potential Maintenance Projects on I-110

Project Number/Location	Project Description
2W730/LA-110/Between West Carson Street and W. 76th Street	Bridge preservation
2W740/LA-110/Between Florence Ave. and US-101	Joint seal, deck preservation, spall repair
27610/LA-110 /Between PCH to 223rd Street OC	Gross solids removal devices or other treatment BMP's
2W680/LA-110/Between Hill Street and S. Ave 64	Deck preservation, spall repair, and approach slab
29770/LA-110/ Northbound SR-110 four Level Structure to northbound I-5 Separation	Install safety lighting
29590/LA-110/From Slauson Ave to MLK JR. Blvd. Undercrossing	Roadside safety improvements
31470/LA-110/From Route 110/91 Separation to 30th Street Overcrossing	Install barrier markers, signs, flashing beam
3009U/LA-110/From Gaffey Street to I-10	Major pavement rehabilitation
29750/LA-110 / College Street OC to Grand Ave OC	Install concrete barrier and lighting
31200/LA-110/Between SR-47 and I-5	Install transportation system management

Figure 8: Map of Potential Projects Within/Near South & Southeast Los Angeles Community Plan Areas



Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative): The proposed Build Alternative would not require any changes to existing or planned land uses.

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization and or mitigation measures are required because no change in land use would be required.

2.1.2 Consistency with State, Regional, and Local Plans and Programs

Affected Environment

The following are relevant state, regional, and local plans and programs.

The City of Los Angeles General Plan

The City's General Plan contains goals and policies for future development within the City. The General Plan Framework Element provides overall policy and direction for the entire plan. The City's 35 Community Plans collectively make up the land use policy for the City. Portions of the Project Study Area lie within the South Los Angeles and Southeast Los Angeles Community Plan Areas. The Transportation Element identifies goals, objectives, and policies to achieve long-term mobility and accessibility within Los Angeles. Projects proposed within the City must be consistent with land uses identified in the General Plan Framework and associated community plans.

In addition, transportation improvements within the Greater Los Angeles area are focused on re-working the existing system and transitioning to a more transit-based system that will encourage transit-oriented development and improve area circulation and health by encouraging walking and bicycling for area residents.

Los Angeles County Draft General Plan

The County's General Plan provides policy and guidance for future growth within unincorporated areas of the County. The plan also provides a foundation on which detailed plans, such as community plans or specific plans, may be based. The Mobility Element includes policies for the development of a multi-modal transportation system that will move people, goods, and services in an environmentally and socially responsible way. Projects proposed within unincorporated portions of Los Angeles County must be consistent with land uses identified in the General Plan.

Los Angeles Conservancy Historic Downtown Los Angeles Design Guidelines

The Los Angeles Conservancy, in partnership with the Downtown Center, Historic Core and Fashion District Business Improvement Districts (BIDs) prepared the Historic Downtown Los Angeles Design Guidelines in July 2002. The Guidelines describe how alterations and enhancements to buildings within the Historic Downtown can and should be designed so that they reinforce the area's historic environment. The Design Guidelines are a tool to enhance the physical and visual quality of the district and reinforce its historic and urban character. They provide guidance about compatible storefront and signage design, repair and maintenance of older buildings, renovation that highlights historic features, and sensitive new construction.

The Project Development Team is working with a District 7 Historical Architect and Section 106 Other Consulting Parties in order to ensure that the design of the proposed Build Alternative enhances the physical and visual quality of the district and reinforce its historic and urban character. The final design of the bridge will be consistent with the Los Angeles Conservancy Historic Downtown Los Angeles Design Guidelines.

Section 106 Other Consulting Parties are defined in the American Society of State Highway and Transportation Officials (ASHTO) Practitioner's Handbook, "Consulting Under Section 106 of the Historic Preservation Act" (February 2007) as:

> *Individuals and organizations with a demonstrated interest in the undertaking also may be designated by the Federal lead agency as consulting parties. See 36 C.F.R. § 800.2(c)(5). These other entities may include …individual property owners, and other stakeholders. These invited consulting parties have the right to receive information and make their views known at various points in the process, but do not have the right to veto a project decision.*

Downtown Street Standards

The City of Los Angeles City Council adopted the City of Los Angeles Downtown Street Standards in April 2009. The Downtown Street Standards updated the Central City Community Plan street designations based on a more comprehensive street hierarchy that balance traffic flow with other equally important functions of the street, including: pedestrian needs, public transit routes and stops, bicycle routes, historic districts with fixed building street walls, the public face and transitional "front yard" of businesses, pedestrian environments and linear open- space considerations.

The Downtown Street Standards establish definitive future curb lines and property lines for all Downtown streets, and, in some locations, additional required average sidewalk easements. The Downtown Street Standards consist of a series of street cross sections which are specific to each street or street segment.

Southeast Los Angeles Community Plan

The community plan emphasizes improving mobility and access. The City's transportation network should provide adequate accessibility to jobs, services, amenities, open space, and entertainment, and maintain acceptable levels of mobility of all those who live, work, travel, or move goods in Los Angeles. Attainment of this goal necessitates a comprehensive program of physical infrastructure improvements, traffic systems management techniques, and land use and behavioral changes that reduce vehicle trips. An emphasis should be placed on providing for and supporting a variety of travel modes, including walking, bicycling, public transit, and driving.

South Los Angeles Community Plan

The South Los Angeles Community Plan recognizes that land use and mobility goals and policies are interdependent. These citywide goals include:

- Support a first-class, multi-modal transportation system in which jobs, services and amenities are easily accessible to all residents and visitors, which respects the City's unique communities and neighborhoods, and which reduces the City's dependence on automobiles
- Improve air quality, public health, and quality of life through continued investment in rail, transit, bicycle, pedestrian, and trail infrastructure
- Create a street network that balances the needs of all roadway users, including pedestrians, bicyclists, transit riders, and motorists, and which values streets as public open spaces

Federal Transportation Improvement Program (FTIP)

The FTIP/FSTIP (Federal Statewide Transportation Improvement Program) contains all capital and non-capital transportation projects or identified phases of transportation projects in the State of California that are proposed for federal funding under the Federal Transit Act and Title 23 of the United States Code. In addition, all projects that are deemed regionally significant, regardless of the funding source, are included in the FSTIP. Federally- funded transportation projects must conform to the FTIP/FSTIP prior to being approved.

State Transportation Improvement Program (STIP)

The STIP is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the transportation investment fund and other funding sources. Projects receiving STIP funding must be programmed prior to moving forward with implementation.

Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The SCAG 2012-2035 RTP/SCS presents the transportation vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties. The 2012-2035 RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area. Projects being constructed within the SCAG region must be listed in the 2012-2035 RTP/SCS.

The 2012-2035 RTP/SCS goals are as follows:

- Align the plan investments and policies with improving regional economic development and competitiveness
- Maximize mobility and accessibility for all people and goods in the region
- Ensure travel safety and reliability for all people and goods in the region
- Preserve and ensure a sustainable regional transportation system
- Maximize the productivity of our transportation system
- Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)
- Actively encourage and create incentives for energy efficiency, where possible;
- Encourage land use and growth patterns that facilitate transit and non-motorized transportation
- Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies
- A reduction in Green House Gas Emissions (GHG)

Growth Vision Report Compass Blueprint

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has collaborated with interdependent sub-regions, counties, cities, communities, and neighborhoods in a process referred to by SCAG as Southern California Compass which resulted in the development of a shared Growth Vision Report for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. SCAG began Compass in 2002, spearheaded by the Growth Visioning Subcommittee, which consists of civic leaders throughout the region. The shared regional vision sought to address issues such as congestion and housing availability which may threaten the region's livability.

The underlying goal of the growth visioning effort is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income. To organize the strategies for improving the quality of life in the SCAG region, a series of principles was established by the Growth Vision Subcommittee. These goals are contained in the Growth Vision Report and are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. Decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies also are provided as a way to achieve each of the principles.

Regional Comprehensive Plan (RCP)

SCAG has also prepared and issued the 2008 RCP in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan incorporates principles and goals of the Compass Blueprint Growth Vision and includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

RCP Guiding Principles

- Improve mobility for all residents. Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives
- Foster livability in all communities. Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing, and equal distribution of environmental benefits
- Promote sustainability for future generations. Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources

Air Quality Goals

- Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.
- Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas
- Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM10, PM2.5, ultrafine), and carbon monoxide
- Expand green building practices to reduce energy-related emissions from developments to increase economic benefits to business and residents

Table 5 lists relevant goals, policies, and objectives related to transportation, circulation, and air quality elements discussed in the City of Los Angeles' General Plan, South Los Angeles Community Plan, and Southeast Los Angeles Community Plan. Table 6 presents the consistency determination for each alternative on relevant policies, goals and objectives for relevant plans and programs.

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Table 5: List of Relevant Goals, Policies, & Objectives

Plan/Programs	Element	Relevant Goals/Policies/Objectives
The City of Los Angeles General Plan	Transportation	**Policy 1.1** Establish highway and transit accessibility measures to be used in evaluating the transportation needs of the City's communities.
		Policy 1.7 Provide improved transportation services to support Citywide economic development activities and related economic revitalization initiatives.
		Policy 2.3 Promote the development of transportation facilities and services that encourage transit ridership, increase vehicle occupancy, and improve pedestrian and bicycle access.
	Circulation	**Policy 3.13** Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and along mixed-use boulevards; promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design.
	Air Quality	**Policy 1.1** To reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth Citywide.
		Policy 1.3 To reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
		Goal 4 Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.
	Noise	**Policy 17** Encourage Caltrans, Metro and other responsible agencies to plan and construct transportation systems so as to reduce potential noise impacts on adjacent land uses.
County of Los Angeles General Plan	Mobility	**Goal M1:** Street designs that incorporate the needs of all users.
		Goal M2: Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.
		Goal M4: An efficient multimodal transportation system that serves the needs of all residents.

Plan/Programs	Element	**Relevant Goals/Policies/Objectives**
Southeast Los Angeles Community Plan	Circulation	**Goal M1:** A diverse and multi-functional system of streets that balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons and vehicles while providing sufficient mobility options for the existing and future users of the street system.
		Goal M2: A circulation system that supports successful neighborhood commercial areas by providing multi-modal access, streets that accommodate public open space and gathering places.
		Goal M3: A walkable community that is universally accessible, safe, pleasant, convenient, and contains an integrated pedestrian system that reduces vehicular conflicts, promotes walking and provides links within the community and to surrounding communities.
		Goal M7: A network of streets, highways, and freeways that supports existing and planned land uses, and provides improved motorized vehicle mobility throughout Southeast Los Angeles.
South Los Angeles Community Plan	Circulation	**Goal M1:** A street system that is diverse and balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons, and vehicles, while providing sufficient mobility and abundant access options for the existing and future users of the street system.
		Goal M2: A circulation system that supports successful neighborhood commercial areas by providing multi-modal access, streets that accommodate public open space and gathering places.
		Goal M3: Throughout the community, a street environment that is pleasant, universally accessible, safe, and convenient for pedestrians.
		Goal M7: A network of streets, highways, and freeways that supports existing and planned land uses, and provides improved motorized vehicle mobility throughout the South Los Angeles Community Plan Area, particularly on congested corridors.

Table 6: Consistency Determination for Relevant Policies, Goals, and Objectives

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
The City of Los Angeles General Plan	Transportation	**Policy 1.1** Establish highway and transit accessibility measures to be used in evaluating the transportation needs of the City's communities.	Yes, highway and transit accessibility measures can be used to evaluate the City's transportation needs if the No-Build Alternative is chosen.	Yes, highway and transit accessibility measures are considered/developed as part of the design of the proposed Build Alternative, which requires coordination with the City and the surrounding community to ensure that accessibility and the City's transportation needs are met.
		Policy 1.7 Provide improved transportation services to support Citywide economic development activities and related economic revitalization initiatives.	No, the current condition does not provide improved transportation services Citywide.	Yes, the proposed Build Alternative would improve circulation and accommodate multi-modal transportation services to encourage access to businesses, and the workforce in the area for all users (drivers, pedestrians, bicyclists, and public transportation users). Construction of the project would provide an economic benefit by potentially providing jobs.
		Policy 2.3 Promote the development of transportation facilities and services that encourage transit ridership, increase vehicle occupancy, and improve pedestrian and bicycle access.	No, this alternative would not promote the development of transportation facilities and services that encourage transit ridership, increase vehicle occupancy, and improve pedestrian and bicycle access. This alternative does not promote development of transportation facilities.	Yes, Caltrans promotes development of transportation facilities and services that encourage transit ridership, increase vehicle occupancy, and improve pedestrian and bicycle access. Please refer to the Traffic and Transportation/Pedestrian and Bicycle Facilities section in this document for avoidance, minimization, and/or mitigation measures.

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
City of Los Angeles General Plan (continued)	Circulation	**Policy 3.13** Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and along mixed-use boulevards; promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design.	No, this alternative does not enhance pedestrian circulation.	Yes, this project has been designed to accommodate the City of Los Angeles' My Fig Project which has many features to enhance pedestrian circulation and provide access to the community via walking and or bicycling. Further, mitigation measure MIT-1 P&B will enhance pedestrian circulation and enhance safe access to the surrounding community via Figueroa Way by eliminating conflicts between pedestrian and bicycle traffic by adding a designated bike lane.
	Air Quality	**Policy 1.1** To reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth Citywide.	No, existing condition would remain, which will increase air pollutants because of the lack of traffic mobility.	Yes, improved mobility, and reduction in idling is anticipated as a result of this alternative. By reducing idling, air pollutants are also reduced (see section 2.2.4 of this document for more details on air quality impacts).
		Policy 1.3 To reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	Not applicable. Since no construction would occur, particulate air pollutants would not be an issue.	Yes, if this alternative is chosen all applicable Best Management Practices (BMPs) will be implemented during construction, which would reduce particulate air pollutants emanating from unpaved areas, and construction sites. All State and Federal laws will be followed throughout the construction period. Refer to section 2.2.4 in this document for appropriate BMPs.

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
City of Los Angeles General Plan (continued)	Air Quality (continued)	**Goal 4** Minimal impact of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.	Yes, but air quality is likely to worsen since more vehicles are idling due to the fact that the current transportation infrastructure is not able to support the number of vehicles traveling through the project study area. Delay times will continue to worsen if current condition remains.	Yes, coordination with the City of Los Angeles, studying existing and future land use, as well as air quality conditions ensure that the relationship between land use, transportation, and air quality are addressed. This alternative does not impact land use patterns. Future land use development on air quality is influenced by smart land use decisions that are likely to improve transportation and air quality.
	Noise	**Policy 17** Encourage Caltrans, Metro and other responsible agencies to plan and construct transportation systems so as to reduce potential noise impacts on adjacent land uses.	Not applicable, since no construction would occur therefore, no planning of minimization measures would be required for potential noise impacts to adjacent land uses.	No, the proposed Build Alternative will not reduce potential noise impacts on adjacent land uses during or after construction, but with the incorporation of appropriate noise and vibration avoidance, minimization, and/or mitigation measures this impact will be minimized. After the construction period is complete, noise levels will be similar to the current condition (please refer to section 2.2.5 in this document.
County of Los Angeles General Plan	Mobility	**Goal M1:** Street designs that incorporate the needs of all users.	No, existing condition would remain which does not accommodate the current traffic demand or provide safe access to the area for pedestrians, bicyclists, transit users, and mobility challenged persons and vehicles. The current side walk configuration near Flower St. and Adams Blvd. is confusing and not user friendly. There is no designated bike lane/pathway to ensure the separation and safety of pedestrians and bicyclists.	Yes, the proposed Build Alternative would provide all users with sufficient mobility options for existing and future needs. The project would also provide improvements in safety for pedestrians, mobility challenged individuals, bicyclists, public transportation users and drivers. A reduction in congestion is anticipated as a result of the proposed build alternative. The reduction in traffic congestion will potentially reduce traffic accidents at the traffic study locations (refer to the Traffic & Transportation/Pedestrian & Bicycle facility section 2.1.8 in this document for more details).

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
	Mobility (continued)	**Goal M2:** Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.	No, existing condition would remain which does not accommodate the safe travel of pedestrians and/or bicyclists through Figueroa Way, which is a common short cut by community to access the surrounding community. Figueroa Way is currently open to traffic, and bicyclists do not have a designated bike lane or pathway. Further, the current sidewalk configuration of the nearby intersection of Flower St. and Adams Blvd. is oddly configured and is not user-friendly.	Yes, the proposed Build Alternative would provide improvements in safety for pedestrians, mobility challenged individuals, bicyclists, public transportation users and drivers. This will be accomplished by re-designing Figueroa Way to encourage the safe travel of pedestrians as well as bicyclists.
County of Los Angeles General Plan (continued)	Mobility (continued)	**Goal M4:** An efficient multimodal transportation system that serves the needs of all residents.	No, the existing condition would remain which does not provide a transportation system that supports efficient multimodal transportation system that would serve all users. Further, the No-Build Alternative will not resolve the bottleneck intersections. Safe multi-modal access is not currently available on Figueroa Way where there is a potential for vehicle, pedestrian, and bicycle conflicts.	Yes, the transportation system will be improved as a result of this project because the proposed Build Alternative would avoid the bottleneck intersections at Flower St. /Adams Blvd. & NB I-110 HOT off-ramp to Adams Blvd. by connecting the HOT lane traffic to Figueroa St. Improved multi-modal access is anticipated as a result of the proposed Build Alternative. Members of the community are likely to experience improved access regardless of the method of transportation they choose because of the incorporation of avoidance, minimization and/or mitigation measures. Please refer to the Traffic & Transportation/Pedestrian and Bicycle Facilities section in this document for more details.

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
Southeast Los Angeles Community Plan	Circulation	**Goal M1:** A diverse and multi-functional system of streets that balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons and vehicles while providing sufficient mobility options for the existing and future users of the street system.	No, existing condition would remain which does not accommodate the current traffic demand or provide safe access to the area for pedestrians, bicyclists, transit users, and mobility challenged persons and vehicles. The current sidewalk configuration near Flower St. and Adams Blvd. is confusing and not user-friendly. There is no designated bike lane/pathway to ensure the separation and safety of pedestrians or bicyclists on Figueroa Way.	Yes, the proposed Build Alternative would help provide all users with sufficient mobility options for existing and future needs. The project would also provide improvements in safety for pedestrians, mobility challenged individuals, bicyclists, public transportation users and drivers. A reduction in congestion is anticipated as a result of the proposed Build Alternative. The reduction in traffic congestion will potentially reduce traffic accidents at the traffic study locations. Refer to section 2.1.8 in this document for more details.
		Goal M2: A circulation system that supports successful neighborhood commercial areas by providing multi-modal access, streets that accommodate public open space and gathering places.	No, the existing condition would remain which does not provide a circulation system that supports successful neighborhood commercial areas by providing multi-modal access or resolve the bottleneck intersections, which hinders access to commercial areas. Safe multi-modal access is not currently available on Figueroa Way where there is a potential for vehicle, pedestrian, and bicycle conflicts.	Yes, circulation will be improved as a result of this project because the proposed build alternative would avoid the bottleneck intersections at Flower St. /Adams Blvd. & NB I-110 HOT off-ramp to Adams Blvd. by connecting the HOT lane traffic to Figueroa St. Improved multi-modal access is anticipated as a result of the proposed build alternative. Members of the community are likely to experience improved access regardless of the method of transportation they choose because of the incorporation of avoidance, minimization and/or mitigation measures. Please refer to the Traffic & Transportation/Pedestrian and Bicycle Facilities section 2.1.8 in this document for more details.

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
	Circulation (continued)	**Goal M3:** A walkable community that is universally accessible, safe, pleasant, convenient, and contains an integrated pedestrian system that reduces vehicular conflicts, promotes walking and provides links within the community and to surrounding communities.	No, the existing condition would remain which does not accommodate the safe travel of pedestrians through Figueroa Way, which is a common short cut by community to access the surrounding community. Figueroa Way is currently open to traffic, and bicyclists. Further, the current sidewalk configuration of the nearby intersection of Flower St. and Adams Blvd. are oddly configured and is not user-friendly.	Yes, with the implementation of Mitigation P&B-1 access to the proposed build alternative will encourage pedestrians to walk through Figueroa Way but remain safe and reduce the likelihood of vehicular/bicycle/pedestrian conflicts by clearly designating pedestrian and bicycle areas. Further, Figueroa Way will be closed to vehicular traffic which will enhance safety.
Southeast Los Angeles Community Plan (continued)	Circulation (continued)	**Goal M7:** A network of streets, highways, and freeways that supports existing and planned land uses, and provides improved motorized vehicle mobility throughout Southeast Los Angeles.	No, existing condition would remain which would not provide improved motorized vehicle mobility throughout Southeast Los Angeles.	Yes, the proposed Build Alternative will help support existing and planned land uses and provides improved motorized vehicle mobility throughout Southeast Los Angeles by moving traffic away from bottleneck intersections, and improving safety of a known concentrated accident area. Furthermore, the reduction in traffic congestion will potentially reduce traffic accidents at the study locations. Refer to the traffic section in this document for additional details. Also, HOT lanes users would save on average five to ten minutes of travel time during peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours.

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
South Los Angeles Community Plan	Circulation	**Goal M1:** A street system that is diverse and balances the needs of pedestrians, bicyclists, transit users, mobility-challenged persons, and vehicles, while providing sufficient mobility and abundant access options for the existing and future users of the street system.	No, existing condition would remain which does not accommodate the current traffic demand or provide safe access to the area for pedestrians, bicyclists, transit users, and mobility challenged persons and vehicles. The current side walk configuration near Flower St. and Adams Blvd. is confusing and not user friendly. There is no designated bike lane/pathway to ensure the separation and safety of pedestrians and bicyclists.	Yes, the proposed Build Alternative would provide all users with sufficient mobility options for existing and future needs. The project would also provide improvements in safety for pedestrians, mobility challenged individuals, bicyclists, public transportation users and drivers. A reduction in congestion is anticipated as a result of the proposed build alternative. The reduction in traffic congestion will potentially reduce traffic accidents at the traffic study locations (refer to the Traffic & Transportation/Pedestrian & Bicycle facility section 2.1.8 in this document for more details).
		Goal M2: A circulation system that supports successful neighborhood commercial areas by providing multi-modal access, streets that accommodate public open space and gathering places.	No, existing condition would remain which does not accommodate the current traffic demand or resolve the bottleneck intersections, which hinders access to commercial areas. Safe multi-modal access is not currently available.	Yes, circulation will be improved as a result of this project because the proposed Build Alternative would avoid the bottleneck intersections at Flower St. /Adams Blvd. & NB I-110 HOT off-ramp to Adams Blvd. by connecting the HOT lane traffic to Figueroa St. Improved multi-modal access is anticipated as a result of the proposed Build Alternative. Members of the community are likely to experience improved access regardless of the method of transportation they choose because of the incorporation of avoidance, minimization and/or mitigation measures. Please refer to the Traffic & Transportation/Pedestrian and Bicycle Facilities section 2.1.8 in this document for more details.

Plan/Programs	Element	Relevant Goals/Policies/Objectives	Consistent with No-Build Alternative 1?	Consistent with Build Alternative 2?
South Los Angeles Community Plan (continued)	Circulation (continued)	**Goal M3:** Throughout the community, a street environment that is pleasant, universally accessible, safe, and convenient for pedestrians.	No, existing condition would remain which does not accommodate the safe travel of pedestrians through Figueroa Way, which is a common short cut by community to access the surrounding community. Figueroa Way is currently open to traffic, and bicyclists. Further, the current sidewalk configuration of the nearby intersection of Flower St. and Adams Blvd. is oddly configured and is not user-friendly.	Yes, access to the proposed Build Alternative will encourage pedestrians use of Figueroa Way and reduce the likelihood of vehicular/bicycle /pedestrian conflicts by clearly designating pedestrian and bicycle areas. Further, Figueroa Way will be closed to vehicular traffic which will enhance safety.
		Goal M7: A network of streets, highways, and freeways that supports existing and planned land uses, and provides improved motorized vehicle mobility throughout the South Los Angeles Community Plan Area, particularly on congested corridors.	No, existing condition would remain which would not provide improved motorized vehicle mobility throughout South Los Angeles.	Yes, the proposed Build Alternative will help support existing and planned land uses and provides improved motorized vehicle mobility throughout South Los Angeles by moving traffic away from bottleneck intersections, and improving safety of a known concentrated accident area. Furthermore, the reduction in traffic congestion will potentially reduce traffic accidents at the study locations. Refer to the traffic section in this document for additional details. Also, HOT lanes users would save on average five to ten minutes of travel time during peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours.

Environmental Consequences

Alternative 1 (No-Build Alternative): Alternative 1 does not improve the transportation infrastructure, nor does it improve circulation. Adams Blvd. is the terminus of the HOT lane facility, and in order for HOT lanes users to complete their trip to downtown Los Angeles, they must navigate two congested signalized intersections (the I-110 off-ramp/Adams Blvd. and Adams Blvd./Flower St.) in order to reach Figueroa St. a main thoroughfare that traverses Downtown Los Angeles. Therefore, the current condition does not improve the transportation infrastructure or traffic circulation. The current condition is a safety concern because of the higher than average accident rate.

The No-Build Alternative is not consistent with some state, regional, and local plans and programs. The goals and policies of the plans and programs discussed earlier in this section promote improvement in the transportation infrastructure and improving traffic circulation. If Alternative 1 is chosen, than mitigation measure Consistency (CONS)-1 would be recommended.

Alternative 2 (Proposed Build Alternative): This build alternative is consistent with state, regional, and local plans and programs and/or will be consistent with the incorporation of the proper avoidance, minimization and/or mitigation measure. Relevant goals and policies have been considered and it was found that the goals, objectives, and policies of the plans and programs discussed earlier in this section promote improvement in the transportation infrastructure, improve traffic circulation, accommodate many modes of transportation, improve air quality, reduce construction noise on nearby land uses by minimizing any potential impacts, support economic growth, accommodate existing and future residents, businesses and visitors, and other similar goals and policies.

According to a micro simulation model prepared by Caltrans District 7 Office of Traffic Investigations, current HOT lanes users would likely save on average five to ten minutes of travel time during peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours. Furthermore, the reduction in traffic congestion will potentially reduce traffic accidents at the study locations (NB I-110 off-ramp at Adams Blvd., Flower St. at Adams Blvd., and Figueroa St. at Adams Blvd.). Refer to the Traffic & Transportation section 2.1.8 in this document for more details.

Alternative 2 will improve air quality in the future. Caltrans Office of Environmental Engineering (Air Quality Branch) has evaluated the proposed Build Alternative for operational and temporary construction impacts on the ambient air quality in the project vicinity. The carbon monoxide (CO) hot spot analysis demonstrates that the project meets conformity requirements. The Southern California Association of Governments' (SCAG) Transportation Conformity Working Group has concurred that the project is not an air quality concern for Particulate Matter (PM) 10 and PM2.5. There would be a decrease in emissions of some Mobile Source Air Toxics (MSAT) such as diesel particulate matters in 2023 and 2040 when compared to the base year conditions. MSAT emissions would likely be further reduced in the future due to implementation of future vehicle and fuel regulations by the Air Resource Board and the Environmental Protection Agency. Further, noise abatement will be implemented during construction to ensure the reduction of construction noise on nearby land uses.

The economic vitality and wellbeing of the greater Los Angeles region depends upon the safe and timely transport of goods as well as people. I-110/SR-110 from the I-10 to State Route 1 is included in the draft Federal Primary Freight Network and the Highway Freight Network in the 2014 California Freight Mobility Plan. I-110/SR-110 serves as a part of the Intermodal Corridors of Economic Significance (ICES). Alternative 2 will allow vehicles to bypass known bottleneck intersections, reduce potential accidents, and improve travel times by constructing this elevated structure. The Build Alternative would support economic growth, and accommodate existing and future residents, businesses and visitors.

Avoidance, Minimization, and/or Mitigation Measures

Mitigation CONS-1: Caltrans would request that the responsible party of the plan or program (City of Los Angeles/County of Los Angeles) to modify the inconsistent policy, goal, and/or objective. The responsible party may choose not to change the inconsistent policy, goal, and/or objective, which would cause an impact to remain.

Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a shortcut to access the surrounding community.

2.1.3 Parks and Recreational Facilities

Affected Environment

According to the Community Impact Assessment (August 2015) and the Los Angeles Equity Atlas Opportunity Mapped (2014), Los Angeles County has 136 acres of park land and open space per 1,000 residents. An estimated 70% of open space in the County is located in the San Gabriel Mountains.

South Los Angeles Community Plan Area

Recreation and park services in the South Los Angeles Community Plan Area are primarily provided by the City of Los Angeles Recreation and Parks Department (RAP). There are four types of parks: mini, neighborhood, community, and regional parks. Mini parks, sometimes referred to as pocket parks, provide small spaces for limited types of recreational activities to an immediate neighborhood. The Los Angeles Recreation and Parks Department operates a total of 33 parks and/or recreational facilities covering approximately 246 acres in the South Los Angeles Community Plan Area. Of the 33 parks/recreational facilities, Little Green Acres Park-Community Garden, located at 104th St. and Vermont Ave., is the only community park, and Exposition Park, located at 3980 South Menlo Ave., is the only regional park. The remaining 31 parks are neighborhood parks. The Los Angeles County Department of Parks and Recreation also owns and operates the Jesse Owens Community Regional Park at 9621 South Western Ave. At 33.19 acres this park is great in size and is completely within the boundaries of the South Los Angeles Community Plan Area.

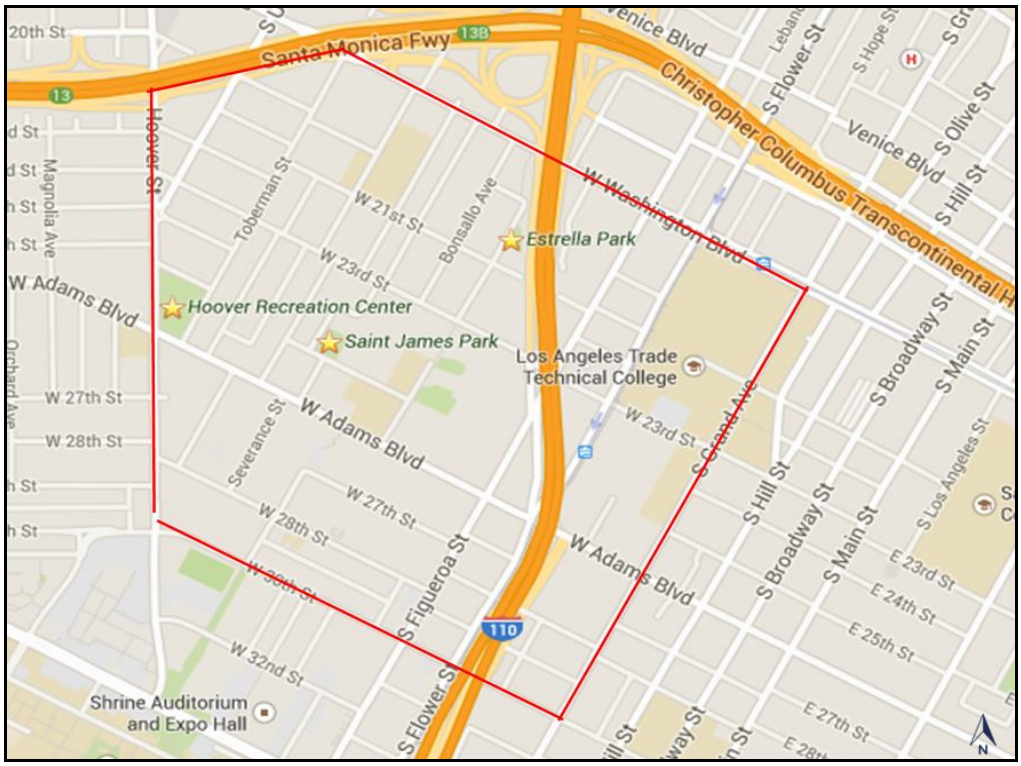
Southeast Los Angeles Community Plan Area

A total of 26 parks and recreational facilities (approximately 142 acres) are located in the Southeast Los Angeles Community Plan Area. Of the 26 facilities, 23 are neighborhood parks and 3 are community parks. To address the need for additional park space, the Recreation and Parks Department has proposed the development of 10 pocket parks in the Community Plan Area. The first four pocket parks proposed in Southeast Los Angeles are located at 4916 S. McKinley Ave., 670 E. 49th St., 139 E. 61st St., and 207 E. 111th Place. The new Grisgby Pocket Park is the result of a partnership between the Watts Neighborhood Council and the Recreation and Parks Department. The park features a community porch and a granite walking track surrounding citrus trees and landscaping. In addition, the Los Angeles County Department of Parks and Recreation operates two regional parks which are located partially within the Southeast Los Angeles Community Plan Area. The Earvin “Magic” Johnson Recreation Area, located along the southern Community Plan boundary and the Ted Watkins Memorial Park, located in Watts, provides approximately 112 and 27 acres of parkland, respectively. Figure 9 shows parks and recreational facilities within the project study area.

The following are a list of parks and recreation centers in the study area, and a description of features of the park/recreational area:

- Saint James Park, Adams Blvd. and Severance St., Los Angeles, CA 90007
  Features include: Children's play area
- Hoover Recreation Center 1010 W. 25th St., Los Angeles, CA 90007
  Features include: An auditorium equipped with a state of the art studio floor and stage, 3 meeting rooms, a full kitchen, a private outdoor courtyard, children's play area, basketball courts, outdoor fitness equipment, walking/running paths, picnic tables, and barbecue pits
- Estrella Park, 1956 Estrella Ave., Los Angeles, CA 90007
  Features include: Children's play area. The Neighborhood Land Trust has organized a series of ongoing programs for youth and adults including yoga, kickboxing, aerobics, mural design, photography and creative writing classes.

Figure 9: Parks and Recreational Facilities in the Study Area



Source: Google Map

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative): No construction and/or operational impacts are anticipated as a result of the proposed Build Alternative. The three parks that are located in the project study area are located far enough from the construction site that the parks will not be directly or indirectly impacted. Therefore, parks and recreational facilities are not anticipated to be used and/or impacted permanently or temporarily by the proposed Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization and or mitigation measures are required because no parks or recreational facilities will be impacted by the project.

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2.1.4 Growth

Regulatory Setting

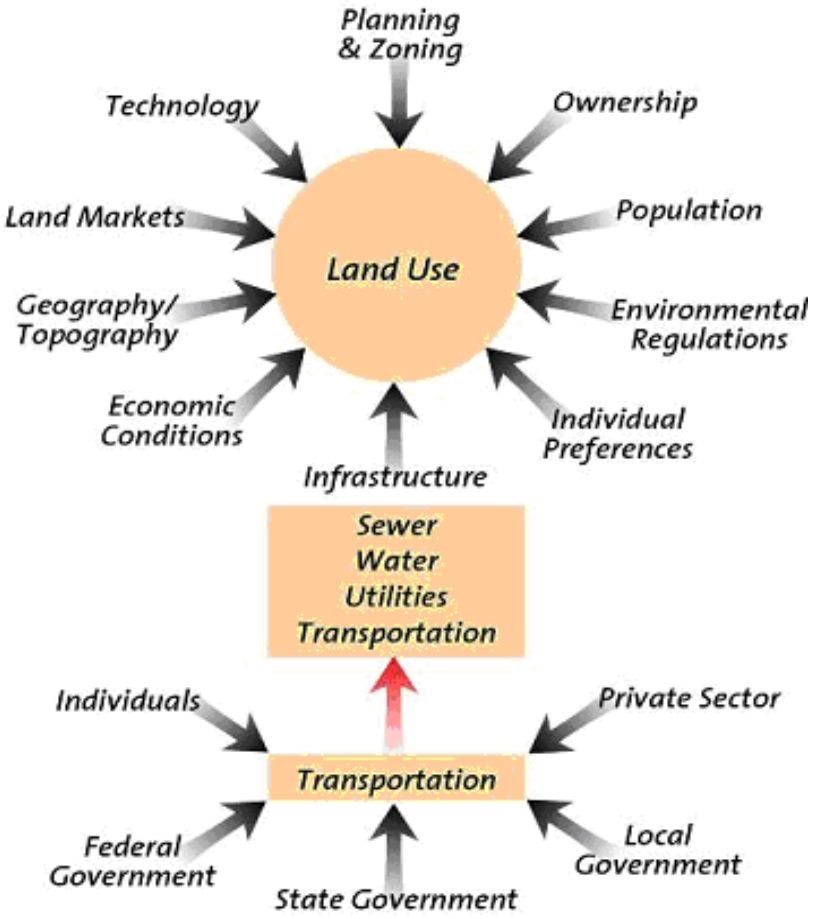
The Council on Environmental Quality (CEQ) regulations, which established the steps necessary to comply with the National Environmental Policy Act (NEPA) of 1969, require evaluation of the potential environmental effects of all proposed federal activities and programs. This provision includes a requirement to examine indirect consequences which may occur in areas beyond the immediate influence of a proposed action and at some time in the future. The CEQ regulations (40 Code of Federal Regulations [CFR] 1508.8) refer to these consequences as indirect impacts. Indirect impacts may include changes in land use, economic vitality, and population density which are all elements of growth.

The California Environmental Quality Act (CEQA) also requires the analysis of a project's potential to induce growth. The CEQA guidelines (Section 15126.2[d]) require that environmental documents "…discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment…"

Affected Environment

Growth inducement is defined as the relationship between the proposed transportation project and growth within the project study area. Many factors influence land use and development in an area (refer to Figure 10 for factors influencing land use and development), such as population and economic growth, desirability of certain locations, the costs and availability of developable land, physical and regulatory constraints, transportation, and the costs of sewer and water services all strongly influence where, when, and what type of development takes place. Many of these factors also influence the policies and decisions associated with land use and growth.

Figure 10: Factors Influencing Land Use and Development



Source: FHWA May 1999. An Overview: Land Use and Economic Development in Statewide Transportation Planning.

According to The Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP), the Southern California Region is running out of room for low density developments and geographical features such as the Pacific Ocean to the west and mountains to the east present natural borders to continue urban spread. In addition to spatial constraints, environmental concerns and transportation limitations are presenting ever-increasing challenges to the continued growth in the area. These, among other factors, are leading to changing growth policy throughout the Los Angeles area where growth is being focused inward and toward a sustainable future.

According to the County's General Plan, policy is based on building a sustainable future through "smart growth" practices. Because future growth will deal more with redevelopment of existing urban areas, the County's General Plan includes a range of strategies to deal with existing growth challenges such as infrastructure, economic development, public health and safety, and natural resources. Within the project study area, transit-oriented and economic development strategies are considered key in revitalizing existing neighborhoods. The City's policies are geared toward accommodating growth. The focus of these policies is directing growth in a way that will support economic development, minimize environmental impacts, and enhance quality of life. The City's primary strategies include transit-oriented development, sustainable infill development, and infrastructure investments.

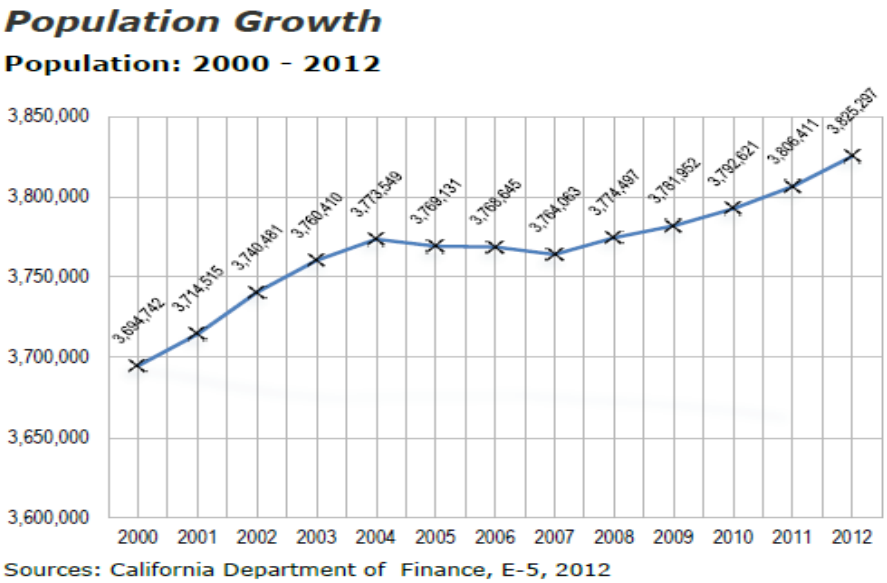
SCAG has forecasted growth in the City of Los Angeles including population growth, household growth, and employment growth. During this 12-year period, the City's population growth rate of 3.5 percent was lower than the Los Angeles County rate of 3.8 percent. In Los Angeles County 38.7% of the total population is in the City of Los Angeles. Table 7 focuses on the 2012 draft regional transportation plan growth forecast (which are the most current estimates) for the City of Los Angeles, which predicts that in 2035 the population will be 4,320,600 with 1,626,600 households and employment of 1,906,800. Figure 11 shows population growth in 2000-2012 in the City of Los Angeles. In 2000, the population was 3,694,742 and in 2012 it was 3,825,297.

Table 7: 2012 Draft Regional Transportation Plan Growth Forecast for the City of Los Angeles

Year	Populations	Households	Employment
2008	3,770,500	1,309,900	1,735,200
2020	3,991,700	1,455,700	1,817,700
2035	4,320,600	1,626,600	1,906,800

Source: SCAG Growth Forecast

Figure 11: City of Los Angeles Population Growth in 2000-2012



Source: SCAG City of Los Angeles Community Profile

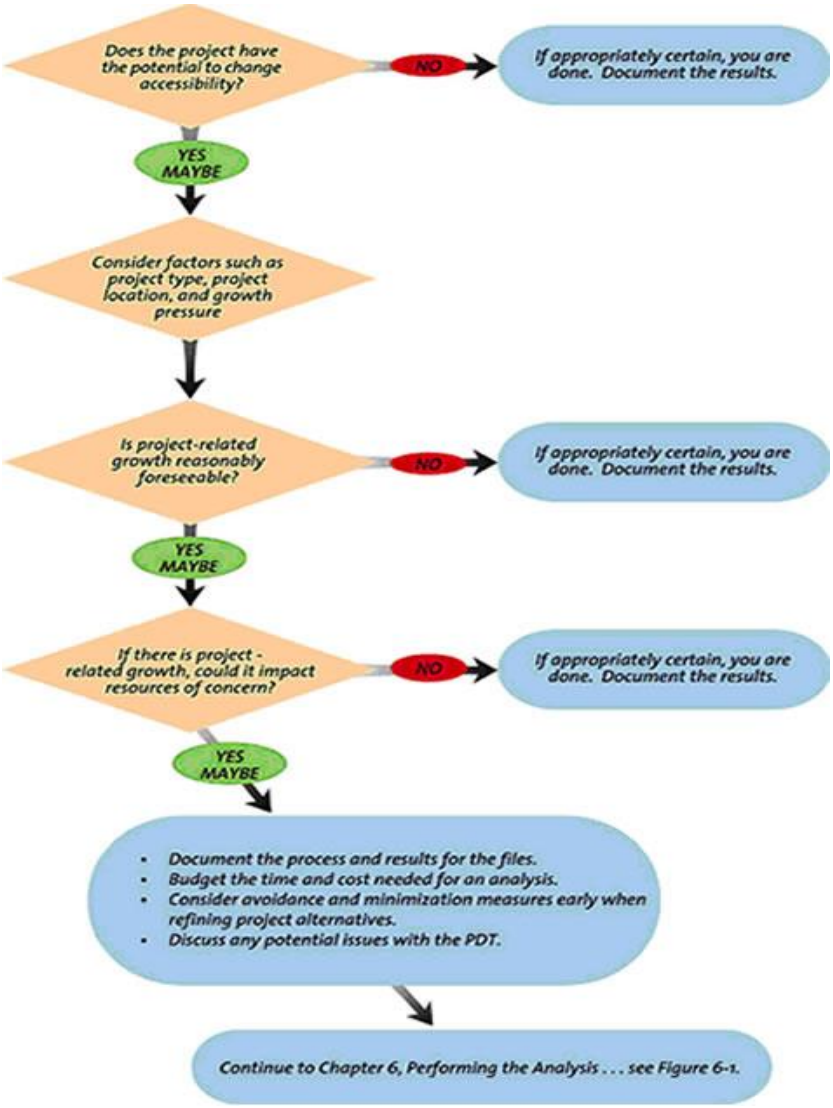
Environmental Consequences

First-Cut Screening Analysis

The proposed project is designed to improve circulation and mobility in the proposed study area. The proposed Build Alternative is also designed to avoid the bottleneck intersections at Flower St. and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa St. The project intends to help meet current and future traffic demands. Therefore, the proposed project would accommodate existing growth trends rather than induce new growth. Figure 12 shows the steps of the first-cut screening analysis which helps answer the following questions:

- To what extent would travel times, travel cost, or accessibility to employment, shopping, and other destinations be changed? Would this change affect travel behavior, trip patterns or the attractiveness of some areas to development over others?
- To what extent would change in accessibility affect growth or land use change its location, rate, type, or amount?
- To what extent would resources of concern be affected by this growth or land use change?

Figure 12: The First Cut Screening Process



Growth-inducing impacts are often secondary impacts resulting from 1) shifts in population growth or distribution, 2) fostering economic growth, or 3) removing obstacles to growth such as providing access to an area that was previously inaccessible.

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Accessibility

Although the proposed project would add a flyover structure, it would not add new access in an area where none existed previously; thus, the potential for growth due to the provision of new access is extremely low. The proposed project would not affect accessibility to employment or shopping, nor would it attract new businesses and residents. The proposed project would provide some improvement in safety and congestion. Given the urban and built-out nature of surrounding development, as well as the purpose of the project, the project would not improve accessibility in areas not previously served by a transportation facility.

Land Use

The project study area is built out which is not indicative of substantial new growth in the area. The pattern and rate of population and housing growth following implementation of the proposed project would be expected to remain consistent with the population anticipated by existing plans for the area. Furthermore, no new or expanded infrastructure, housing, or other similar permanent physical changes to the environment would be necessary as an indirect consequence of the proposed project.

The mobility needs of the community have changed since the opening of the Harbor Transitway in 1998. In the past 18 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improvement. Further, the proximity of the University of Southern California campus and potential development on their property along with other potential developments mentioned in the section 2.1.1 Table 3 List of Potential Projects within/near the South & Southeast Los Angeles Community Plans Study Areas, will increase demand on the transportation system. The current condition along with potential development, increases the need for the proposed Build Alternative which is necessary to correct the existing condition in the area and improve traffic flow.

This analysis does not continue on past the first cut screening process because this project does not have the potential to change accessibility which ends the growth analysis process as seen in Figure 12: The First Cut Screening Process. Based on the first-cut screening analysis presented earlier, the proposed project would not be growth-inducing nor have growth-related impacts. No construction nor operational growth-related impacts are anticipated as a result of the proposed Build Alternative. No additional analysis related to growth is warranted.

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, and/or mitigation measures are required because growth related effects are not anticipated as a result of this project.

2.1.5 Community Impacts

Community Character and Cohesion

Regulatory Setting

The National Environmental Policy Act of 1969 (NEPA), as amended, established that the federal government use all practicable means to ensure that all Americans have safe, healthful, productive, and aesthetically and culturally pleasing surroundings (42 United States Code [USC] 4331[b][2]). The Federal Highway Administration in its implementation of NEPA (23 United States Code [USC] 109[h]) directs that final decisions on projects are to be made in the best overall public interest. This requires taking into account adverse environmental impacts, such as destruction or disruption of human-made resources, community cohesion, and the availability of public facilities and services.

Under the California Environmental Quality Act, an economic or social change by itself is not to be considered a significant effect on the environment. However, if a social or economic change is related to a physical change, then social or economic change may be considered in determining whether the physical change is significant. Since this project would result in physical change to the environment, it is appropriate to consider changes to community character and cohesion in assessing the significance of the project's effects.

Affected Environment

According to the U.S. Census, in 2013, Los Angeles County had a population of 10,017,068 residents. According to the Department of Finance, the County's population alone would make it the eighth largest state in the nation. The White population accounted for approximately 27.2% of the population. The Black/African American population accounted for 9.2% of the population, Hispanics or Latino accounted for 48.3% of the population, and the Asian population and Two or More Races population accounted for less than 17.50% of the population, collectively.

In 2013 the City of Los Angeles' population was 3,884,307. In 2013, the City of Los Angeles was predominantly Hispanic or Latino, which accounted for approximately 49 % of the population. The Black/African American population accounted for 8.6% of the population, the White populations accounted for 28.2% of the population, and the Asian population and Two or More Races population accounted for 13.3.% of the population, collectively. Table 8 lists these percentages for the City and County.

Table 8: 2013 Racial and Ethnic Characteristics of the City and County of Los Angeles

Race/Ethnicity	City of Los Angeles	Los Angeles County
White	28.2%	27.2%
Black/African American	8.6%	9.2%
American Indian/Alaska Native	0.1%	1.5%
Asian	11.2%	14.6%
Native Hawaiian/Other Pacific Islander	0.2%	0.4%
Two or More Races	2.1%	2.9%
Hispanic or Latino	49.3%	48.3%

Source: US Census (October, 2014) and http://www.city-data.com/city/Los-Angeles-California.html

According to the US Census, the reason the percentages in Table 8 add up to more than 100 percent is because Hispanic origin is not a race, and persons of Hispanic origin may be of any race.

Hispanics or Latinos are those people who classified themselves in one of the specific Spanish, Hispanic, or Latino categories listed on the Census 2010 questionnaire -"Mexican," "Puerto Rican", or "Cuban" as well as those who indicate that they are "another Hispanic, Latino, or Spanish origin." People who do not identify with one of the specific origins listed on the questionnaire but indicate that they are "another Hispanic, Latino, or Spanish origin" are those whose origins are from Spain, the Spanish-speaking countries of Central or South America, or the Dominican Republic.

The terms "Hispanic," "Latino," and "Spanish" are used interchangeably. Origin can be viewed as the heritage, nationality group, lineage, or country of birth of the person or the person's parents or ancestors before their arrival in the United States. People who identify their origin as Spanish, Hispanic, or Latino may be of any race. Thus, the percent Hispanic should not be added to percentages for racial categories. Non-Hispanic White Persons are those who responded "No, not Spanish/Hispanic/Latino" and who reported "White" as their only entry in the race question.

The 2010 data on the Hispanic or Latino population were derived from answers to a question that was asked of all people in Census 2010. Estimates for States and Counties for years after 2010 are developed using a cohort-component method whereby each component of population change - births, deaths, domestic migration, and international migration - is estimated separately for each birth cohort by sex, race, and Hispanic origin.

Age

According to the U.S. Census in 2013, Los Angeles County the population was almost 6.5% under the age of 5, approximately 23% persons under 18 years of age and almost 12% were persons 65 years of age and over. As for the City of Los Angeles, the U.S. Census indicates that in 2010 the City of Los Angeles' population was approximately 23% under the age of 18, and about 11% were 65 years of age or older. This is the most recent data to date. Table 9 shows the age characteristics of the City as well as the County of Los Angeles.

Table 9: Age Characteristics of the City and County of Los Angeles

Age	City of Los Angeles (2010)	Los Angeles County (2013)
Under 5 years of age	6.6%	6.4%
Under 18 years of age	23.1%	23.2%
65 years of age and over	10.5 %	11.9%

Source: US Census (October 2014)

Housing

According to the U.S. Census in 2013, there were 3,462,202 units in Los Angeles County. Further, the homeownership rate between 2008 through 2012 was about 47.3%. The median value of owner occupied housing units between 2008 through 2012 was $443,900.

As mentioned in the U.S. Census in 2010, there were 1,413,995 housing units in the City of Los Angeles, and the homeownership rate was 38% between 2008 through 2012. Now, 54.4% of the housing units were in multi-unit structures between 2008 through 2012. The median value of owner occupied housing units between 2008 through 2012 was $470,000. SCAG has forecasted that 40% of the 624,000 new households projected by 2035 (or 250,000 households) will need housing affordable to very low income (less than $26,342 in 2010 dollars) and low income ($26,343-$42,147 in 2010 dollars).

According to SCAG's Sustainable Communities Strategy, by 2021 40% of new housing development in Los Angeles County must be affordable to low income ($26,343-$42,147 in 2010 dollars) or very low (less than $26,342 in 2010 dollars) income households in order to meet the regional housing need. The City of Los Angeles uses the County definition of low and very low income.

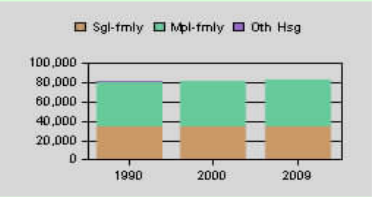
South Los Angeles Community Boundaries

According to the City of Los Angeles Planning Division, in 2009 the total units were 83,053 with 34,217 single family housing units, 48,529 multiple family housing units, and 48,836 non-single family housing units in the South Los Angeles community. Further, in 2009 the total residents were 266,673 with 122, 350 residents in single family units, 143,372 in multiple family units, and 144,306 in non-single family units. Also in 2009, 83,053 were occupied units with 33,163 occupying single-family units, 44,895 occupying multiple family units, 45,177 occupying non-single family units. Figure 13 compares census data for housing and housing occupancy in 1990, 2000, and 2009.

Figure 13: South Los Angeles Housing and Resident Occupancy Populations

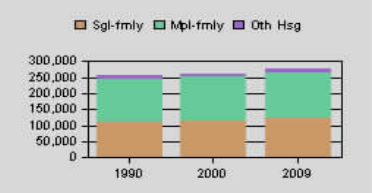
Housing Units

	CENSUS 1990	CENSUS 2000	2009 (est.)
TOTAL HOUSING UNITS	81,748	81,981	83,053
Annual Growth Rate	n/a	0.028%	0.137%
Housing Density (/sqmi)	5,306	5,321	5,391
Single-family Housing Units [3]	34,705	33,924	34,217
Annual Growth Rate	n/a	-0.228%	0.091%
Multiple-family Housing Units [4]	45,892	47,774	48,529
Annual Growth Rate	n/a	0.403%	0.165%
Nonsingle-family Housing Units [4]	47,043	48,057	48,836
Annual Growth Rate	n/a	0.213%	0.169%



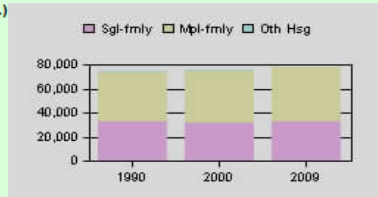
Housing Occupants (Resident Population) [6]

	CENSUS 1990	CENSUS 2000	2009 (est.)
TOTAL RESIDENTS	250,505	252,359	266,673
Annual Growth Rate	n/a	0.074%	0.582%
Residential Population Density	16,260	16,380	17,309
Single-family Unit Occupants [3]	112,997	114,885	122,350
Annual Growth Rate	n/a	0.166%	0.665%
Multiple-family Unit Occupants [4]	134,202	136,659	143,372
Annual Growth Rate	n/a	0.182%	0.506%
Nonsingle-family Unit Occupants [4]	137,508	137,474	144,306
Annual Growth Rate	n/a	-0.002%	0.512%



Housing Occupancy [6]

	CENSUS 1990	CENSUS 2000	2009 (est.)
ALL OCCUPIED UNITS	81,748	81,981	83,053
Vacancy Rate	7.70%	7.68%	5.68%
Occupied Single-family Units	32,683	31,794	33,163
Vacancy Rate	6.19%	6.70%	3.18%
Occupied Multiple-family Units	41,838	43,628	44,895
Vacancy Rate	9.69%	9.50%	8.09%
Occupied Nonsingle-family Units	42,773	43,886	45,177
Vacancy Rate	9.98%	9.50%	8.10%



Notes

1. Resident Population consists of those who live in housing units in the same area covered by Total Population. It is equal to "Total Population in Households".
2. Group Quarters Population includes persons in student dormitories, military barracks, prisons and health care institutions. Group Quarters and Resident Populations sum to Total Population.
3. Single-family Housing Units (SfHUs) only include detached dwellings.
4. Multiple-family Housing Units (MfHUs)include apartment buildings (both for rent and condominiums), duplexes, artist-in-residence lofts, and attached single-family housing units.
5. Nonsingle-family Housing Units (NsHUs) add mobile homes, boats, and other living quarters to MfHUs. Its sum with SfHUs yield all living quarters for residents of the census tract. This value is consistent with the definitions used by the Southern California Association of Governments (SCAG) and the California Department of Finance (DoF).
6. The persons who occupy a housing unit are defined as a HOUSEHOLD. Households may consist of one person, one or more families, or a group of unrelated persons.

* All aggregate statistical estimates are subject to round-off error.

Source: Los Angeles City Planning Website http://cityplanning.lacity.org/DRU/Locl/LocPfl.cfm?geo=CP&loc=SCL&yrx=Y09

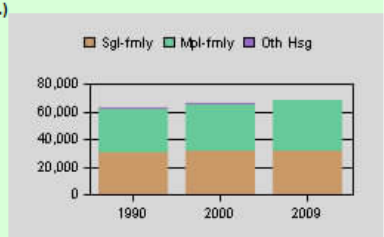
Southeast Los Angeles Community Boundaries

According to the City of Los Angeles Planning Division, in 2009 the total housing units numbered 68,648, with 32,232 single family housing units, 36,162 multiple family housing units, and 36,416 non-single family housing units in the Southeast Los Angeles community. Further, in 2009 the total residents numbered 274,599, with 138,404 residents in single family units, 135,189 in multiple family units, and 136,183 in non-single family units. Figure 14 compares census data for housing and housing occupancy in 1990, 2000, and 2009.

Figure 14: Southeast Los Angeles Housing and Resident Occupancy Populations

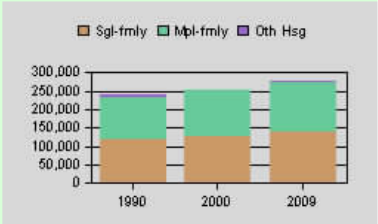
Housing Units

	CENSUS 1990	CENSUS 2000	2009 (est.)
TOTAL HOUSING UNITS	63,120	66,069	68,648
Annual Growth Rate	n/a	0.458%	0.404%
Housing Density (/sqmi)	4,014	4,202	4,366
Single-family Housing Units [3]	30,971	31,361	32,232
Annual Growth Rate	n/a	0.125%	0.289%
Multiple-family Housing Units [4]	31,002	34,473	36,162
Annual Growth Rate	n/a	1.067%	0.505%
Nonsingle-family Housing Units [4]	32,149	34,708	36,416
Annual Growth Rate	n/a	0.769%	0.507%



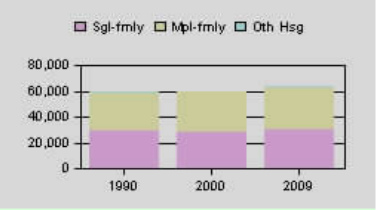
Housing Occupants (Resident Population) [6]

	CENSUS 1990	CENSUS 2000	2009 (est.)
TOTAL RESIDENTS	237,604	253,077	274,599
Annual Growth Rate	n/a	0.633%	0.863%
Residential Population Density	15,111	16,095	17,464
Single-family Unit Occupants [3]	119,703	126,589	138,404
Annual Growth Rate	n/a	0.561%	0.944%
Multiple-family Unit Occupants [4]	113,544	125,624	135,189
Annual Growth Rate	n/a	1.016%	0.775%
Nonsingle-family Unit Occupants [4]	117,900	126,488	136,183
Annual Growth Rate	n/a	0.706%	0.780%



Housing Occupancy [6]

	CENSUS 1990	CENSUS 2000	2009 (est.)
ALL OCCUPIED UNITS	63,120	66,069	68,648
Vacancy Rate	5.53%	9.33%	6.89%
Occupied Single-family Units	29,618	28,504	30,579
Vacancy Rate	4.57%	10.02%	5.41%
Occupied Multiple-family Units	28,969	31,201	33,103
Vacancy Rate	7.02%	10.48%	9.24%
Occupied Nonsingle-family Units	30,008	31,399	33,339
Vacancy Rate	7.13%	10.54%	9.23%



Notes

1. Resident Population consists of those who live in housing units in the same area covered by Total Population. It is equal to "Total Population in Households".
2. Group Quarters Population includes persons in student dormitories, military barracks, prisons and health care institutions. Group Quarters and Resident Populations sum to Total Population.
3. Single-family Housing Units (SfHUs) only include detached dwellings.
4. Multiple-family Housing Units (MfHUs)include apartment buildings (both for rent and condominiums), duplexes, artist-in-residence lofts, and attached single-family housing units.
5. Nonsingle-family Housing Units (NsHUs) add mobile homes, boats, and other living quarters to MfHUs. Its sum with SfHUs yield all living quarters for residents of the census tract. This value is consistent with the definitions used by the Southern California Association of Governments (SCAG) and the California Department of Finance (DoF).
6. The persons who occupy a housing unit are defined as a HOUSEHOLD. Households may consist of one person, one or more families, or a group of unrelated persons.

* All aggregate statistical estimates are subject to round-off error.

Source: Los Angeles City Planning Website http://cityplanning.lacity.org/DRU/Locl/LocPfl.cfm?geo=CP&loc=SCL&yrx=Y09

According to Mapping Los Angeles (Los Angeles Times) the following is South Los Angeles' Community Profile:

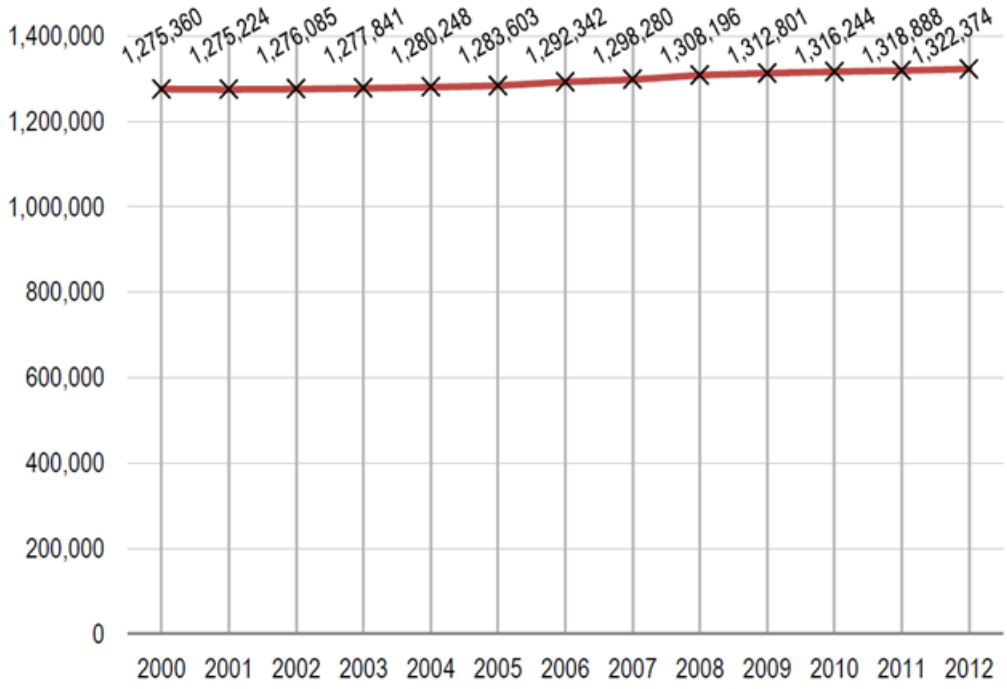
According to the U.S. Census in 2000, the population was 749,453. The most diverse neighborhood is University Park. 8.2% of the residents 25 years and older have a four-year degree. 63.1% of households are renters with University Park having the highest rental rate.

According to Mapping Los Angeles (Los Angeles Times) the following is Southeast Los Angeles' Community Profile:

According to the U.S. Census in 2000, the population was 1,190,425. 11.4% of the residents 25 years and older have a four-year degree. 46.9% of households are renters.

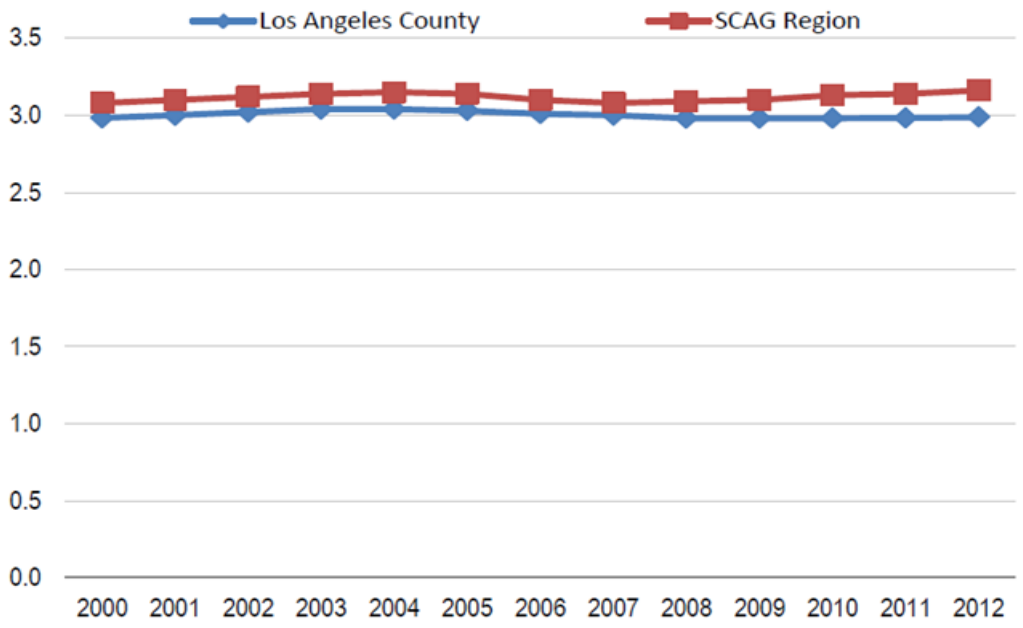
Figures 15 and 16 show that between 2000 and 2012, the total number of households in Los Angeles County increased by 115,804 units, or 3.7 percent. During this 12-year period, the County's household growth rate of 3.7 percent was lower than the SCAG region growth rate of 9 percent. 55.4 percent of SCAG Region's total number of households is in Los Angeles County. In 2012, the county's average household size was 3.0, lower than the SCAG region average of 3.2.

Figure 15: Number of Households (Occupied Housing Units) in the City of Los Angeles 2000-2012



Source: SCAG City of Los Angeles Community Profile

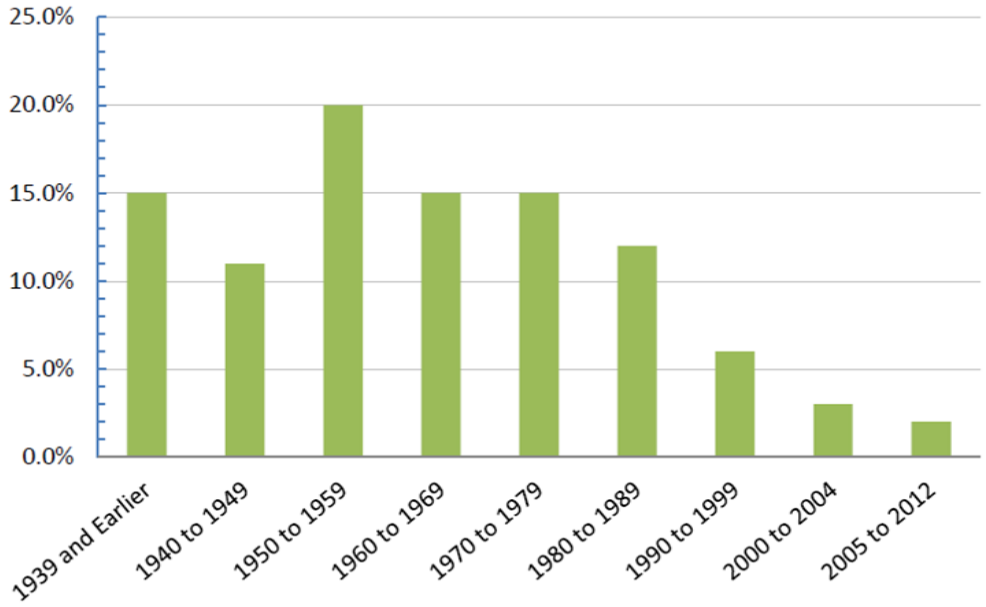
Figure 16: Average Household Size in the City of Los Angeles 2000-2012



Source: SCAG City of Los Angeles Community Profile

The most common housing type in the City of Los Angeles in 2012 is single family detached. 61% percent of the housing stock was built before 1970. The age of housing stock data partly reflects the local development history. Figure 17 shows the age of housing stock in the City of Los Angeles. It shows that about 20% of the housing stock was built from 1950 to 1959, and approximately 2% were built from 2005 to 2012.

Figure 17: Age of Housing Stock in the City of Los Angeles



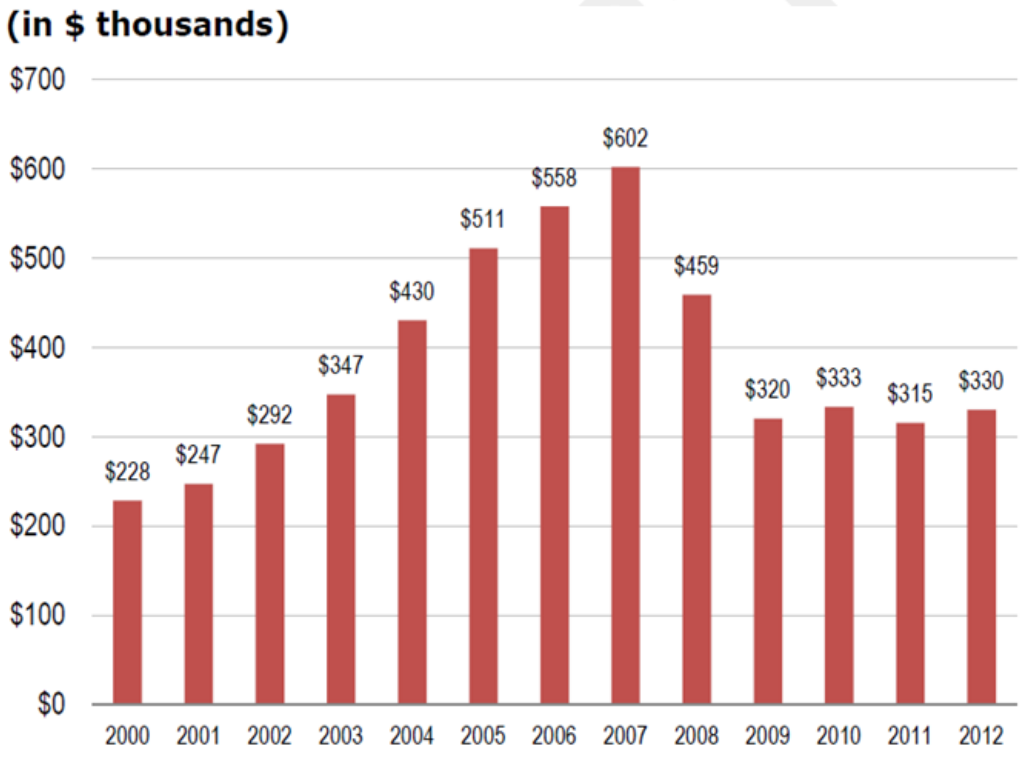
Source: SCAG City of Los Angeles Community Profile

Property Values

Property value is a reflection of the demand for the property. The market value of the property is the value for which the property can be sold on the open market and establishes the equity that the owner has in the property. The assessed value is set by the tax assessor and is the value at which the property taxed. A change in the assessed value would result in a proportional change in property tax on the property. Figure 18 shows the median home sale prices for existing homes in the City of Los Angeles from 2000-2012. During this range, prices were at their highest over $600,000 in 2007 and at their lowest (approximately $228,000) in 2000.

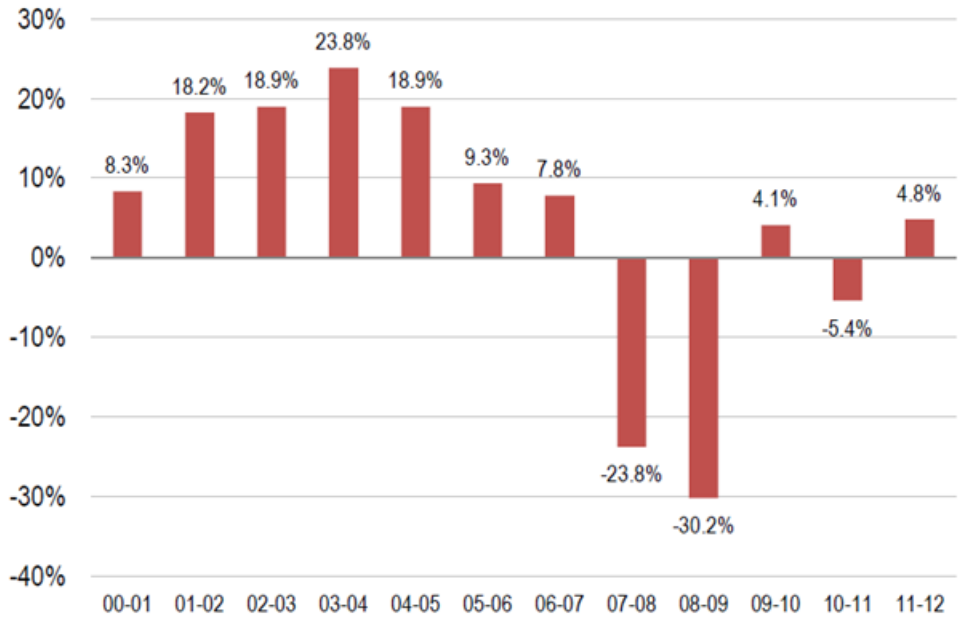
Between 2000 and 2012, the median home sales price increased 44.8 percent from $227,897 to $330,000. Median home sales price decreased by 0.9 percent between 2010 and 2012. In 2012, the median home sales price in the county was $330,000. Median home sales price reflects re-sales of existing homes and simply provides guidance on the market values of homes sold in the County. Between 2000 and 2012, the change in annual home sales prices ranged between -30.2 and 23.8 percent. Between 2010 and 2012, the change in annual home sales prices was between -5.4 and 4.1 percent. Figure 19 shows Annual Median Home Sale Price Change for Existing Homes in Los Angeles in 2000-2012. The most drastic change occurred in 2008/2009 of -30.2%. The highest positive increase was seen in 2003/2004.

Figure 18: Median Home Sale for Existing Homes in the City of Los Angeles from 2000-2012



Source: SCAG City of Los Angeles Community Profile

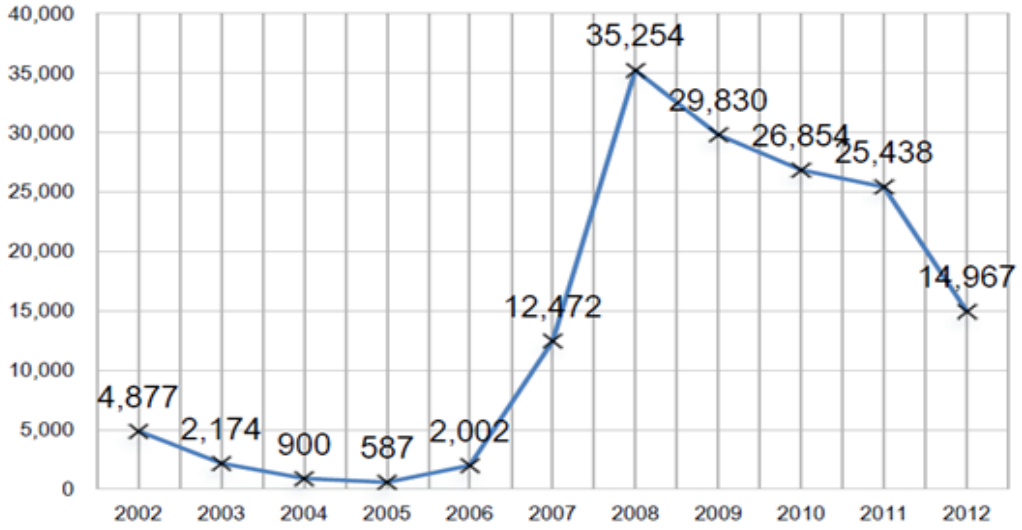
Figure 19: Annual Median Home Sales Price Change for Existing Homes in Los Angeles in 2000-2012



Source: SCAG City of Los Angeles Community Profile

Figure 20 discusses foreclosures in the City of Los Angeles from 2000-2012. There were a total of 14,967 foreclosures in 2012. Between 2007 and 2012; there were a total of 144,815 foreclosures.

Figure 20: Foreclosures in the City of Los Angeles from 2000-2012



Source: SCAG City of Los Angeles Community Profile

Community Cohesion

Community cohesion is the degree to which residents have a sense of belonging to their neighborhood, a level of commitment of the residents to the community, or a strong attachment to neighbors, groups, and institutions, usually as a result of continued association over time. Also, cohesion refers to the degree of interaction among the individuals, groups, and institutions that make up a community.

Field surveys and discussions with local public officials and community leaders (such as clergy members) and historical preservation organizations provided valuable information and insight into the community's makeup and cohesiveness which confirmed a high level of community cohesion within the study area. The field surveys focused on social interactions among the neighborhood, pedestrian activity, predominance of single-family dwellings or apartments with courtyards, shared parking lots and yards of a housing complex, condition of houses, parks, and other community facilities.

Community facilities contribute in many ways to community cohesion. Community facilities are those services and institutions that the local population relies on for their health and welfare and as a means to interact with other members of the community. Community facilities include schools, libraries, recreation facilities, health providers, emergency services, community centers, boys and girls clubs, and other similar institutions. The severity of the impact of the transportation project on community cohesiveness will depend on how much the community uses and relies on the facility, and the degree to which the project will impede or enhance the ability of residents to access the facility. Facilities that are frequently accessed by the elderly, disabled, low-income, and minority populations, are especially important because these groups often have limited mobility and may depend on transit to access the facilities.

Further, while initiating public outreach, it was found that residents and other interested parties either individually or through their representatives expressed particular concerns for their neighborhood. Similar attitudes were voiced by interested parties that may be affected by the proposed project, which shows cohesiveness.

Based on Caltrans' previous interaction with this community back in the 1980s and 1990s for the I-110 Transitway Northern Terminus to Adams Blvd. Initial Study/Environmental Assessment and more recently in 2014 and 2015 for the I-110 High-Occupancy Toll Lane Flyover Project Initial Study/Environmental Assessment, this neighborhood displays a high level of community cohesion. Because of local concerns following the circulation of the I-110 Transitway Northern Terminus to Adams Blvd. Initial Study/Environmental Assessment Caltrans held an open house/public input meeting on May 3, 1990.

Caltrans has coordinated with this community on several occasions and has continuously observed a high level of cohesiveness. Interested parties and stakeholders have come together on many occasions to voice their concerns about impacts to the community as a result of potential projects.

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

Impacts to community character and cohesion, specifically to pedestrians and bicyclists, are anticipated during construction due to the closure of Figueroa Way to all traffic. These impacts will be minimized with the implementation of a Traffic Management Plan (minimization measure T-1).

Construction impacts related to noise, vibration, odor, or pollution will be minimized by following all relevant laws, regulations, and Caltrans Standards which include but are not limited to Best Management Practices.

Potential Operational Impacts

The closure of Figueroa Way may represent an impact to community character and cohesion; however, mitigation measure P&B-1 will be incorporated, which intends to redesign and repurpose Figueroa Way (see Figure 21) as a bicycle and pedestrian pathway. With the incorporation of this mitigation measure, the impact will be less than significant. Temporary and permanent social impacts are discussed in Table 10.

Figure 21: Preliminary Re-design of Figueroa Way

Looking South from St. John's Church

Table 10: Checklist for Assessing Temporary & Permanent Social Impacts

Questions	**No Build Alternative 1 (Yes, No or Not Applicable)**	**Build Alternative 2 (Yes, No or Not Applicable)**
1. Will the project create a barrier that divides the neighborhood or limits access to all or part of the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety. Figueroa Way will be closed to vehicular traffic once the project is complete. The existing Metro bus stop on Figueroa Way is anticipated to be consolidated with the currently existing stop on Figueroa St. /23rd St. Therefore, the Metro Silver Line and OCTA bus lines 701 and 721 will be using the existing bus stop on Figueroa St./23rd St.
2. Will the project impact any special groups (such as the elderly, persons with disabilities, racial/ethnic/religious groups) within the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	Yes, the proposed Build Alternative will temporarily impact special groups such as the elderly, and persons with disabilities within the neighborhood with respect to access to Figueroa Way during the construction period. The community will potentially experience this temporary impact not just special groups. After construction, access will be regained for pedestrians and bicyclists, but will be closed to vehicular traffic.
3. Will the project reduce the amount of social interaction that occurs within the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, the project is not anticipated to reduce the amount of social interaction that occurs within the neighborhood Figueroa Way is not considered an area where the community gathers to interact with one another.
4. Will the displacement of residents resulting from the proposed project negatively affect the perceived quality of life in the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	Not applicable. No residents will be displaced as a result of the proposed Build Alternative.

Questions	**No Build Alternative 1 (Yes, No or Not Applicable)**	**Build Alternative 2 (Yes, No or Not Applicable)**
5. Will the project affect access to, parking for, or result in the removal of, neighborhood facilities or services that are needed and valued by neighborhood residents (stores, parks, public services, schools)?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No. Currently, there are 10 parking spots within State right of way on Figueroa Way that are being used by the businesses located in the nearby strip mall informally (this area is not leased from the State by any particular business). These 10 parking spots will be used for this project. There is ample parking within the strip mall. The Build Alternative would not result in temporary or permanent adverse effects related parking. No neighborhood facilities or services that are needed and valued by the neighborhood residents will be temporarily or permanently impacted as a result of the proposed Build Alternative.
6. Will the facilities and services subject to removal or relocation be able to remain in, or within proximity of, the neighborhood?	Not Applicable.	Not applicable. No relocations are anticipated.
7. Will the project result in an increase in noise, vibration, odor, or pollution that reduces social interaction in the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	Yes, but impacts will be temporary. Construction impacts related to noise, vibration, odor, or pollution will be minimized by following all relevant laws, regulations, and Caltrans Standards which include but are not limited to Best Management Practices. Further, a permanent increase in noise, vibration, odor, or pollution that reduces social interaction in the neighborhood is not anticipated as a result of operation of the proposed Build Alternative.
8. Will communal areas (e.g., parks and playgrounds) used by residents be negatively affected by construction of the project?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, communal areas are not anticipated to be negatively affected (temporarily or permanently) by the proposed Build Alternative. All work will be within State right of way/City of Los Angeles right of way.
9. Will the availability and convenience of transit services be reduced as a result of the project?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, the availability and convenience of transit services will not be reduced (temporarily or permanently) as a result of the proposed Build Alternative. The existing Figueroa Way Metro Silver Line bus stop on Figueroa Way will be eliminated, but all buses impacted by this bus stop elimination will be able to use the existing bus stop on Figueroa St. and 23rd St.

Questions	**No Build Alternative 1 (Yes, No or Not Applicable)**	**Build Alternative 2 (Yes, No or Not Applicable)**
10. Will the project negatively affect pedestrian and non-motorized mobility within the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	Yes, the project will impact pedestrians and non-motorized mobility. Figueroa Way is currently being used by pedestrians and bicyclists as a short cut to access the surrounding community, but during construction this may not be possible, but with the incorporation of the following mitigation measure that impact will be less than significant. MIT P&B-1 refer to section 2.1.8 in this document. Any temporary construction impacts will be minimized by following all relevant laws, regulations, and Caltrans Standards that include, but are not limited to, Best Management Practices and a Transportation Management Plan.
11. Will vehicular mobility within the neighborhood be negatively affected by this project?	Yes, vehicular mobility on the mainline and on local streets would be negatively affected because traffic circulation is poor, there is a higher than average accident rate that is a safety concern, and there are several nearby bottleneck intersections.	Yes, but the impacts to vehicular mobility is temporary, and with the implementation of a project specific transportation management plan the impacts will be minimized. No permanent negative impacts to vehicular mobility are anticipated as a result of the proposed Build Alternative. According to a micro simulation model prepared by Caltrans District 7 Office of Traffic Investigations, current HOT lanes users would save on average five to ten minutes of travel time during peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours. Furthermore, the reduction in traffic congestion will potentially reduce traffic accidents at the study locations (NB I-110 HOT off-ramp at Adams Blvd., Flower St. at Adams Blvd., and Figueroa St. at Adams Blvd. and Figueroa St. at 23rd St.). Refer to the Traffic & Transportation section for more details on the micro-simulation model, and higher than average accident rate.
12. Will vehicular traffic increase on local streets as a result of the project?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, it is not anticipated that the proposed Build Alternative will (temporarily or permanently) increase vehicular traffic on local streets. The project aims to accommodate current and future needs of the community. Currently, there are no plans to increase capacity on local streets, and the goal of the proposed build alternative is to accommodate future demands. The following information is based on the existing condition assuming no improvements. In 2018, the northbound I-110 HOT off-ramp/Adams Blvd. Interchange Annual Daily Traffic (AADT) will be 14000 and by 2040 it will be 15500. Further, in 2018 the northbound I-110 Main Line off-ramp/Adams Blvd. Interchange will have an AADT of 10500 and by 2040 it will be 11000. The proposed Build Alternative would accommodate future demands. Travel times are anticipated to improve by one to two minutes on local streets during peak hours because of the redistribution of traffic. Refer to section 2.1.8 in this document for more details.
13. If vehicular traffic increases, will this create unsafe conditions for non-motorized transportation within the neighborhood?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, vehicular traffic is not anticipated to increase because of the project. As mentioned in question 12 above, AADT will increase in the future, and the proposed Build Alternative is anticipated to accommodate this traffic increase. Further, with the incorporation of avoidance, minimization, and/or mitigation measures safety for non-motorized transportation will be increased because a designated bike lane/bike pathway will be incorporated into the project design to ensure the separation of vehicular, pedestrian, and bicycle traffic.

Questions	**No Build Alternative 1 (Yes, No or Not Applicable)**	**Build Alternative 2 (Yes, No or Not Applicable)**
14. Will there be any changes to popular bicycle or pedestrian routes?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	Yes, Figueroa Way will be impacted as a result of the Build Alternative. Figueroa Way is currently being used by pedestrians and bicyclists which may not be possible during construction. Figueroa Way will be re-designed to encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, ADA compliance, and signage to ensure the safety of pedestrians and bicyclists that use Figueroa Way. Also, a designated bike pathway or bike lane will be incorporated into the project to ensure that pedestrian traffic and bicycle traffic have designated areas to safely move through Figueroa Way to access the community. The Transportation Management Plan will minimize temporary construction impacts to bicyclists and pedestrians.
15. Will "blind or isolated" areas be created that are difficult to monitor for criminal activity as a result of the project?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, no permanent or temporary "blind or isolated areas" are anticipated to be created because of the proposed build alternative. St. John's Cathedral Church staff voiced concern over the potential area under the elevated structure. In response to these concerns and to circulation related impacts mitigation measure P&B-1 (refer to section 2.1.8 in this document) has been introduced to mitigate the Figueroa Way closure and enhance the bicyclist and the pedestrian experience, which encourages a walk through area instead of "blind or isolated areas" under the elevated structure.
16. Will emergency response routes be negatively impacted as a result of the project?	No, construction would not occur. Therefore, no temporary/permanent construction/operational impacts would occur.	No, permanent negative impacts to emergency response routes are anticipated as a result of the proposed project. Any temporary impacts will be minimized by coordination with fire and police departments in the area during construction and a project specific Transportation Management Plan will also be in place in order to ensure timely responses.

Source: Florida DOT, *Community Impact Assessment, A Handbook for Transportation Professionals* 2000.

Avoidance, Minimization, and/or Mitigation Measures

Minimization T-1: A Traffic Management Plan (TMP) will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a shortcut to access the surrounding community.

This mitigation measure will address the potentially significant impacts to community character and cohesion as a result of the proposed Build Alternative. Incorporation of this mitigation measure will also reduce/eliminate the occurrence of "blind or isolated spots" underneath the elevated structure, which was a concern raised by St. John's Church staff.

Minimization BUS-1: The Metro Silver Line bus stop on Figueroa Way will be consolidated.

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2.1.6 Environmental Justice

Regulatory Setting

All projects involving a federal action (funding, permit, or land) must comply with Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, signed by President William J. Clinton on February 11, 1994. This EO directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. Low income is defined based on the Department of Health and Human Services poverty guidelines. For 2014, this was $23,850 for a family of four.

All considerations under Title VI of the Civil Rights Act of 1964 and related statutes have also been included in this project. Caltrans' commitment to upholding the mandates of Title VI is demonstrated by its Title VI Policy Statement, signed by the Director, which can be found in Appendix B of this document.

Affected Environment

As discussed in the Community Impact Assessment (August 2015) by 2035 the Los Angeles region is expected to add four million people, a majority of them non-white. According to the U.S. Census, in 2013, Los Angeles County's population was predominately Hispanic or Latino, and less than 10 % Black/African-American. Asians made up about 15% of the population. American Indians/Alaska Native and Native Hawaiian/Other Pacific Islander made up less than 2% of the population. Lastly individuals who identified themselves as two or more races was almost 3%. In 2010 in the City of Los Angeles the U.S. Census found that approximately 49% of the population was Hispanic or Latino and approximately 10 % Black/African-American. Asians made up about 11% of the city's population. American Indians/Alaska Native and Native Hawaiian/Other Pacific Islander made up less than 1% of the population. Lastly, individuals who identified themselves as two or more races was almost 5%. Table 11 lists these percentages.

Table 11: Minority Populations in the City and the County of Los Angeles

Race/Ethnicity	City of Los Angeles (2010)	Los Angeles County (2013)
Black/African American	9.6%	9.2%
American Indian/Alaska Native	0.7%	1.5%
Asian	11.3%	14.6%
Native Hawaiian/Other Pacific Islander	0.1%	0.4%
Two or More Races	4.6%	2.9%
Hispanic or Latino	48.5%	48.3%

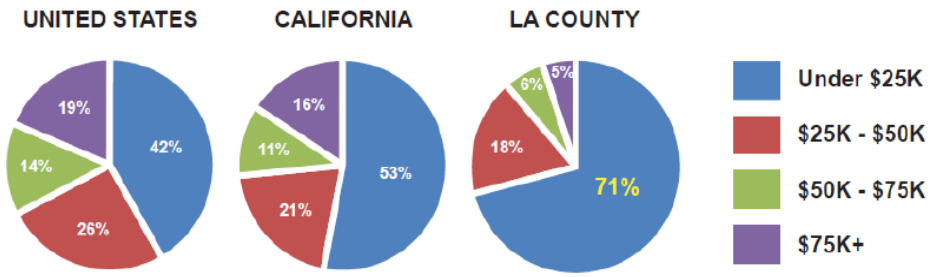
Source: US Census (October, 2014)

According to the U.S. Census in 2013, the median household income was $55,909 Los Angeles County with 19% of residents living in poverty. The median household income for the City of Los Angeles was $53,046 with 14.5% of people living in poverty.

Mobility and Transit Dependence

According to The Los Angeles Equity Atlas Opportunity Mapped 2014, almost 90% of transit commuters in Los Angeles County earn less than $50,000. Over 70% of transit commuters have incomes below $25,000. Households living near transit are more than twice as likely to walk, bike or take transit to work as those living away from transit (21% vs. 9%). This is true among low-income workers as well (31% vs. 16%). 31% of workers who live near transit earning less than $25,000 take transit, bike or walk to work, vs. 13% of workers near transit earning between $25,000 and $50,000. Transportation is the second highest household expense for the average American, and Los Angeles County residents spend more of their income on transportation than the national average. Refer to Figure 22 for transit ridership to work by income level in 2009. Los Angeles County has 71% transit ridership to work with an income under $25,000 per year, which is higher than the State average of 53% and the nation's average of 42%.

Figure 22: Transit Ridership to Work by Income Level, 2009



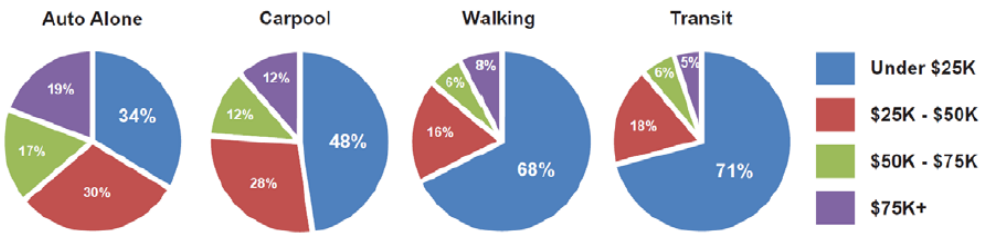
Source: The Los Angeles Equity Atlas Opprotunity Mapped, 2014

The average commute time is 29 minutes in Los Angeles County, compared with 25 minutes nationally. About 12% of workers in the County have commutes longer than 60 minutes, compared with 8% nationally. Over 470,000 workers commute into Los Angeles County each day one of the largest in-county commuting rates in the nation. But a large number also commute out of the County (336,000 residents).

Low-income workers have both shorter and longer commutes than average workers, due to lower rates of driving. Refer to Figure 23 which shows Los Angeles County Transportation to work by worker income level in 2011. This figure states that 71% of transit riders made under $25K per year. 68% of workers that walk to work made under $25K per year, and only 48% of workers who carpool make under $25K per year. Only 34% of workers that drive their automobiles alone make under $25K per year. Figure 24 shows income levels and distance to work in Los Angeles County in 2011. Over 50% of individuals that earn a lower wage work within a less than 10 mile radius of their home. Contrast this with high wage-earning individuals, wherein a little over 40% work within a less than 10 mile radius of their home. The high wage workers seem to be able to work further from home than compared with low wage income earners. Those who bike and walk to work have shorter commutes, and those who take transit have longer commutes. 52% of commutes on transit take more

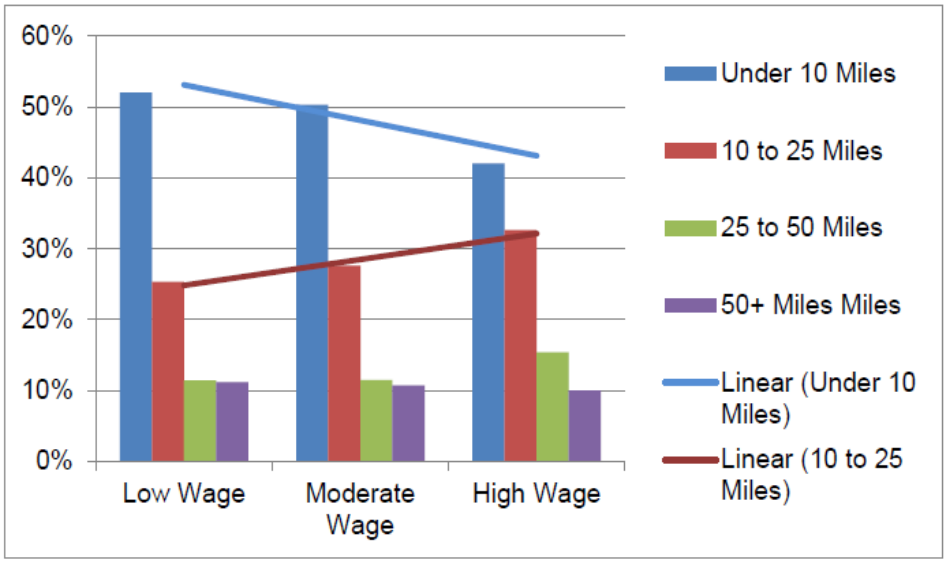
than 45 minutes, compared with 21% of commutes overall. The average County household spends 22% of its income on transportation, or about $13,400 each year. This is a higher share of income than the national average of 17%. Low-income workers live in both areas that are central to the County and transit network and areas at the outer edge of the county; this explains the division in commute patterns, where low-income workers are both more likely to have short and long commutes.

Figure 23: Los Angeles County Transportation to Work by Worker Income Level, 2011



Source: The Los Angeles Equity Atlas Opprotunity Mapped, 2014

Figure 24: Income Levels and Distance to Work in Los Angeles County



Source: The Los Angeles Equity Atlas Opprotunity Mapped, 2014

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts and Potential Operational Impacts

The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in this document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period.

No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

There are no disproportionate adverse effects on any low-income and/or minority populations as per EO 12898 regarding environmental justice.

Avoidance, Minimization, and/or Mitigation Measures

Below are the sections in this document where the proper avoidance, minimization, and/or mitigation measures are required in order to ensure that no disproportionate adverse effects on any low income and/or minority populations as per EO 12898 regarding environmental justice would occur.

Air quality measures can be found in section 2.2.5 of this document.

Noise and vibration measures can be found in section 2.2.6 of this document.

Water pollution measures can be found in section 2.2.1 of this document.

Hazardous Waste measures can be found in section 2.2.4 of this document.

Community impact measures can be found in section 2.1.5 of this document.

Traffic circulation measures can be found in section 2.1.8 of this document.

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2.1.7 Utilities and Emergency Services

Affected Environment

Utilities

The Los Angeles Department of Water and Power (LADWP) is responsible for ensuring that water demand in the City is met and that state and federal water quality standards are achieved. The LADWP is the nation's largest municipal utility, and its service area is slightly larger than the legal boundary of the City. Under the provisions of the City Charter, the LADWP has complete charge and control of its water distribution system inside the City of Los Angeles. Water supply boundaries are not divided by community plan area, but rather bounded based on pressure zones that are dictated by ground elevation.

The LADWP also provides electric service to the City of Los Angeles. To ensure a reliable supply of power, the LADWP maintains a diversified energy generation mix – including coal, natural gas, large hydroelectric, nuclear, and renewable power such as wind, biomass, solar and cogeneration. The LADWP draws its energy supply from in-basin power plants and several out-of-state facilities in Nevada, Utah and the Pacific Northwest. Business and industry consume about 70 percent of the electricity in Los Angeles, but residents constitute the largest number of customers. In addition to serving these consumers, the LADWP lights public streets and highways, powers the city's water system and sells electricity to other utilities. Natural gas services in the area are provided by the Southern California Gas Company.

The City of Los Angeles Department of Public Works Bureau of Sanitation (LABS) provides sewer conveyance infrastructure and wastewater treatment services to the City of Los Angeles. The primary responsibility of the LABS is to collect, clean and recycle solid and liquid waste generated by residential, commercial and industrial users. The Bureau manages and administers three primary programs: 1) wastewater collection, conveyance, treatment, and disposal; 2) solid waste resources collection, recycling and disposal; and 3) watershed protection.

The City of Los Angeles Department of Public Works Bureau of Sanitation (LABS) provides solid waste management services to single-family and small multi-family residential households in Los Angeles. Private hauling companies collect other refuse, including most multi-family and all commercial and industrial waste. The City of Los Angeles Solid Waste Management Policy Plan (SWMPP) is the current long range solid waste management policy plan for the City. The Solid Waste Integrated Resources Plan (SWIRP) will become the City's 20-year master plan to achieve zero waste in Los Angeles.

Police

Law enforcement services are provided by the City of Los Angeles Police Department (LAPD), which operates within four bureaus (Central, South, Valley and West) throughout the City. The LAPD uses a work load computer model (Patrol Plan) to deploy patrol officers to the various geographic areas in the City. This model includes several factors, such as response time, service calls, and traffic conditions. The South Los Angeles Community Plan Area falls within the jurisdiction of the Central, South, and West Bureaus of the LAPD.

The Central Bureau encompasses approximately 65 square miles and serves a population of 900,000 people. This bureau operates five police stations, three of which serve portions of the South Los Angeles Community Plan Area that include the Rampart, Central, and Newton Community Police Stations. The Rampart Community Police Station is located at 1401 W. 6th St., and serves a small portion of the South Los Angeles Plan Area along the northern-eastern boundary. The Central Community Police Station is located at 251 East 6th St. in Downtown Los Angeles, and also serves a small portion of the Community Plan Area along its northern edge. The Newton Community Police Station is located in the Southeast Los Angeles Community Plan Area at 3400 South Central Ave., and serves a small part of the South Los Angeles community plan area along the eastern boundary of South Los Angeles, south of Slauson Avenue.

The LAPD South Bureau encompasses approximately 57 square miles and serves a population of approximately 640,000 people. This bureau operates four police stations, three of which serve the project area: the 77th Street, Southeast, and Southwest Community Police Stations. The 77th Street Community Police Station is located at 7600 South Broadway and serves the south-west neighborhoods in South Los Angeles, generally between Vernon Ave. and 108th St. The Southeast Community Police Station is located at 145 West 108th St. and serves the south portion of the community plan area, east of Vermont Ave. from Manchester Ave. to 120th St.

The LAPD West Bureau serves an area of approximately 124 square miles which contain approximately 840,000 residents. The Olympic Community Police Station located at 1130 South Vermont Ave., serves a northern portion of the Plan Area generally bounded by Arlington Ave. on the west, Pico Ave. on the north, Hoover St. on the east and the Santa Monica Freeway (I-10) on the south. The California Highway Patrol Station is located within the study area at 777 W. Washington Blvd. Los Angeles, CA 90015. This is the only law enforcement office within the project study area.

Fire and Emergency Services

Fire prevention, fire protection and Emergency Medical Service (EMS) for the City of Los Angeles are primarily provided by the Los Angeles Fire Department (LAFD). The Los Angeles County Fire Department (LACFD) also provides fire protection and emergency services for areas of the South Los Angeles Community Plan Area that border other jurisdictions, through automatic-aid agreements with the LAFD. The LAFD operates 106 neighborhood fire stations located throughout the Department's 470-square-mile jurisdiction. The South Los Angeles Community Plan Area is served by six fire stations, as shown in Table 12. The LAFD is responsible for fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.

Table 12: Fire Stations Serving the South Los Angeles Area

Fire Station Number	Address
13	2401 West Pico Blvd.
15	915 West Jefferson Blvd.
26	2009 South Western Ave.
46	4370 South Hoover St.
57	17800 South Vermont Ave.
66	1909 West Slauson Blvd.

Source: LAFD Planning Section, and South Los Angeles Community Plan

Southeast Los Angeles is served by five fire stations, as shown in Table 13.

Table 13: Fire Stations Serving the Southeast Los Angeles Area

Station Number	Address
14	3401 South Central Ave.
21	1192 East 51st St.
33	6506 South Main St.
64	10811 South Main St.
65	1801 East Century Blvd.

Source: LAFD Planning Section and Southeast Community Plan

Fire Department services are based on the community's needs, as determined by ongoing evaluations. When an evaluation indicates increased response time, the acquisition of equipment, personnel, and/or new stations is considered.

As development occurs, the Fire Department reviews environmental impact reports and subdivision applications for needed infrastructure. Development is subject to the standard conditions of the LAFD with regard to station construction, fire suppression systems and emergency medical services.

Environmental Consequences

Alternative 1 (No Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

No construction impacts would occur because no utilities will be removed, relocated, or required to be protected in place as a result of the proposed Build Alternative. No construction impacts to emergency services are anticipated as a result of the Build Alternative with the implementation of minimization measure T-1.

Potential Operational Impacts

No operational impacts would occur because no utilities will be removed and or relocated as a result of the proposed Build Alternative. No operational impacts to emergency services are anticipated as a result of the Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

Minimization T-1: A Traffic Management Plan (TMP) will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

2.1.8 Traffic and Transportation/Pedestrian and Bicycle Facilities

Regulatory Setting

The Department, as assigned by FHWA, directs that full consideration should be given to the safe accommodation of pedestrians and bicyclists during the development of federal-aid highway projects (see 23 Code of Federal Regulations [CFR] 652). It further directs that the special needs of the elderly and the disabled must be considered in all federal-aid projects that include pedestrian facilities. When current or anticipated pedestrian and/or bicycle traffic presents a potential conflict with motor vehicle traffic, every effort must be made to minimize the detrimental effects on all highway users who share the facility.

In July 1999, the U.S. Department of Transportation (USDOT) issued an Accessibility Policy Statement pledging a fully accessible multimodal transportation system. Accessibility in federally assisted programs is governed by the USDOT regulations (49 CFR Part 27) implementing Section 504 of the Rehabilitation Act (29 United States Code [USC] 794). FHWA has enacted regulations for the implementation of the 1990 Americans with Disabilities Act (ADA), including a commitment to build transportation facilities that provide equal access for all persons. These regulations require application of the ADA requirements to federal-aid projects, including Transportation Enhancement Activities.

Affected Environment

Caltrans will comply and meet FHWA multimodal goals/visions and Caltrans Complete Street Deputy Directive by ensuring the safety of pedestrians, bicyclists, and motorists. The project design features include upgrading and/or replacing road signs, lighting, and landscape work to improve safety for users. A Traffic Management Plan (TMP) will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall include the following implementation plans: public information, motorist information, incident management, and traffic management during construction. Further, as a result of the proposed project a re-design of Figueroa Way to encourage pedestrian and bicycle use will occur.

Accident Data

Traffic Accident Surveillance and Analysis System (TASAS) selective record retrieval summary and accident rates for the following period of three (3) years (10/01/2010 and 09/30/2013) are as follows:

The TASAS history analysis revealed a total of 265 accidents (1 fatal, 77 injury, and 178 Property Damage Only (PDO)) within the time period. The primary collision factors identified were speeding (206), improper turn (9), other violations (37), under influence of alcohol (11), other than driver (1), and following too closely (0), where 249 and 16 collisions occurred when the roadway was dry and wet, respectively. Most of the collisions reported took place when there was no unusual roadway condition. There were 182 collisions which occurred in daylight, 69 in dark with street lights, 8 in dark with no street lights, and 6 in dusk/dawn. For movement preceding collisions, there were: proceeded straight (239), stopped (153), changing lanes (37), slowing/stopping (45), and other (14). Locations of collisions are as follows: interior lanes (177), left lane (45), and right lane (44), beyond shoulder driver's right (7), beyond shoulder driver's left (7), HOV lane (3), right shoulder area (2),

and left shoulder area (1). The types of collisions were: 210 rear-end, 37 sideswipe, 14 hit-objects, 2 broadsides, 1 overturn, and 1 head-on. The object struck median barrier (7), guardrail (5), overturned (1), wall (except sound wall) (2), and other object on road (1). Table 14 shows Northbound selective accident rate calculations and it shows a higher than average accident rate for I-110 NB HOT lane off-ramp to Adams Blvd.

Below is the methodology of accident rate calculations:

- Number of fatal accidents divided by million vehicle-miles (MVM) equals the number of fatal accidents per MVM.
- Number of injury accidents divided by MVM equals the number of injury accidents per MVM.
- Number of PDO accidents divided by MVM equals the number of PDO accidents per MVM.

Table 14: TASAS– Northbound Selective Accident Rate Calculation

Location	Fatal Accident Rates					
I-110	Actual (Accidents/MVM)			Average (Accidents/MVM)		
	Fatal	F + I	Total	Fatal	F + I	Total
I-110 NB HOT/Express Lane off-ramp to Adams Boulevard PM 20.54	0.000	**0.23**	0.59	0.003	0.21	0.62
I-110 NB off-ramp to Mixed flow off-ramp to Adams Boulevard PM 20.478	0.00	**0.62**	**1.56**	0.003	0.35	1.01
I-110 Mainline NB Freeway PM 20.10-20.92	0.008	**0.64**	**2.18**	0.004	0.31	1.04
Location	TASAS Selective Records Retrieval Summary					
I-110 Between PM 20.10-20.92	TASAS of all crashes between 10/01/2010 and 09/30/2013			Type of Collision 10/01/2010 and 09/30/2013		
	total Collision	fatal Collision	"fatal+injury" Collision	Rear End	Hit Object	Sideswipe
I-110 NB HOT/Express Lane off-ramp to Adams Boulevard PM 20.54	**5**	0	**2**	3	0	1
I-110 NB off-ramp to Mixed flow off-ramp to Adams Boulevard PM 20.478	**15**	0	**6**	8	3	3
I-110 Mainline NB freeway PM 20.10-20.92	**265**	1	**78**	210	14	37

Source: Draft Project Report (September 2015)

Between the period of 10/01/2010 and 09/30/2013, at the NB Route 110 HOT lane off-ramp (PM 20.540), the actual "fatal + injury" accident rates are slightly higher than the average accident rates. Between the period of 10/01/2010 and 09/30/2013, at the NB Route 110 mixed flow off-ramp (PM 20.478), the actual "fatal + injury" accident rates are higher than the average accident rates but and "total" actual accident rates are 50% higher than the average "total" accident rates. Between the period of 10/01/2010 and 09/30/2013, along the NB Route 110 mainline (PM 20.10 and PM 20.92), the actual "fatal + injury" and the "total" accident rates are higher than the average accident rates. The fatal accident occurred on 9/10/2011 were caused by a speeding motorcycle that rear ended a car, then the motorcycle's driver was ejected and collided with the roadway.

Traffic and Transportation

According to the Traffic Study Report Addendum (April 2015), detailed intersection capacity and operational analyses were conducted at several key intersections in the vicinity of the project site for weekday AM (7:30 to 9:30 AM) and PM(5:00 to 7:00 PM) peak hours. The following intersections were analyzed using the Highway Capacity Manual (HCM), Transportation Research Board-2010 methodology: Northbound I-110 HOT off-ramps and Adams Blvd., Flower St. and Adams Blvd., Figueroa St. and Adams Blvd., and Figueroa St. and 23rd St. Table 15 clarifies what the HCM defines as level of service.

Table 15: HCM Level of Service (LOS Criteria)

Level of Service (LOS)	Signalized Intersections (Average Control Delay per Vehicle in Seconds)	Un-signalized Intersections (Average Control Delay per Vehicle in Seconds)	Description of LOS
A	<=10	<=10	Very low vehicle delays, free traffic flow, signal progression extremely favorable, most vehicles arrive during given signal phase
B	>10-20	>10-15	Good traffic flow, good signal progression, more vehicles stop and experience higher delays than for LOS A.
C	>20-35	>15-25	Stable traffic flow, fair signal progression, significant number of vehicles stop at signal.
D	>35-55	>25-35	Noticeable traffic congestion, longer delays and unfavorable signal progression, many vehicles stop at signals.
E	>55-80	>35-50	Unstable traffic flow, poor signal progression, significant congestion, traffic near roadway capacity, frequent traffic signal cycle failures.
F	>80	>50	Unacceptable delay, extremely unstable flow, heavy congestion, traffic exceeds roadway capacity stop and go conditions.

Existing Traffic Data

The 2014 and future 2018 and 2040 Annual Average Daily Traffic (AADT) for the NB I-110 HOT off-ramp/Adams Blvd. Interchange and NB I-110 Mainline Off-ramp/Adams Blvd. Interchange along Route 110 is provided in the Table 16 and 17.

Table 16: AADT – NB I-110 HOT Off-ramp/Adams Blvd Interchange

Year	Route	County	Post mile	NB Peak Hour	NB AADT
2014	110	LA	20.478	1150	12000
2018	110	LA	20.478	1413	14000
2040	110	LA	20.478	1521	15500

Source: Draft Project Report (September 2015)

Table 17: AADT – NB I-110 Main Line off-ramp/Adams Blvd Interchange

Year	Route	County	Post mile	NB Peak Hour	NB AADT
2014	110	LA	20.478	967	10000
2018	110	LA	20.478	1015	10500
2040	110	LA	20.478	1092	11000

Source: Draft Project Report (September 2015)

Micro-simulation Software

Synchro software was used in this study to determine macro LOS and delays, then SimTraffic software was used to simulate study conditions. SimTraffic is a microscopic model used to simulate a wide variety of traffic controls. Each vehicle in the traffic system is individually tracked through the model and comprehensive operational measures of effectiveness are collected on every vehicle during each 0.1-second of the simulation. Unlike Synchro, SimTraffic measures the full impact of queuing and blocking.

SimTraffic was used as companion software to Synchro software. SimTraffic can be used for simulation and animation purposes. The following are some items that are included in the program and considered for simulation:

- Calibration to match real-world conditions
- Multiple runs averaged to reduce the variability in results. The model recorded 5 to 10 simulation runs

Pedestrian and Bicycle Facilities

The Los Angeles Department of Transportation (LADOT) recognizes the need for improving pedestrian safety and enhancing the City's pedestrian environment. Pedestrian safety is a high priority activity for the City. LADOT has recently added two Pedestrian Coordinator positions to oversee the pedestrian safety program and create a comprehensive Pedestrian Master Plan for the City.

Teams of engineers in the LADOT conduct studies to improve pedestrian safety. They evaluate the safety of City crosswalks and children's walking routes to Los Angeles schools. Adult crossing guards are assigned at elementary school crossings. Loading zones adjacent to schools are reviewed and in some cases, special drop-off zones can be arranged in coordination with the school. LADOT also works with the City's Pedestrian Advisory Committee to develop policies and projects to improve pedestrian safety zones can be arranged in coordination with the school. The Pedestrian Advisory Committee (PAC) advises the City of Los Angeles on pedestrian issues. PAC's mission is "to create a safe pedestrian environment and to encourage walking as a viable travel mode. The goals of PAC include: promote safe behavior by both pedestrians and motorists, identify locations where pedestrian safety is most at risk, recommend physical, operational and policy changes to reduce the risk of pedestrian fatalities and injuries, recommend improvements to pedestrian facilities to make walking attractive, provide pedestrian-oriented recommendations on land use plans.

Part of LADOT's pedestrian safety program involves increasing the visibility of pedestrians to motorists at street crossings where a stop sign or traffic signal is not present. Crosswalks are often enhanced in the following ways:

- Installing visual warnings for drivers, which include ladder crosswalk markings, warning signs, warning pavement messages and extended red curb zones
- Assigning school crossing guards at locations near elementary schools in order to provide the adult guidance needed to cross streets
- Deploying "pedestrian warning devices" at the most critical locations. This LADOT innovation warns motorists of pedestrians by flashing overhead beacons after they push the crosswalk button

According to the South and Southeast Los Angeles Community Plans, Los Angeles is in an ideal position to encourage bicycle usage. Excellent climatic conditions for bicycling in Southern California prevail approximately 340 days per year. By increasing the number of bicyclists who ride for commuting and other utilitarian purposes, traffic congestion is reduced and air quality is improved. In addition, bicyclists benefit from improved health and fitness. A large portion of personal trips are two miles or shorter, many of which people may prefer to complete by bike, if a safe route exists.

The City of Los Angeles' 2010 Bicycle Plan, a part of the Transportation Element, was created to enhance bicycle transportation at a citywide scale and includes three goals: (1) To increase the number and types of bicyclists who bicycle in the City, (2) to make every street a safe place to ride a bicycle, and (3) to make the City of Los Angeles a bicycle-friendly community. This Plan helps to implement the 2010 Bicycle Plan at the community level through policies and programs that support the goals above. Specifically, the Bicycle Plan calls for increased bikeways along Major Highway Class II streets, particularly those with bus rapid transit service, as well as the establishment of Bicycle-Friendly Streets on streets with low traffic volumes and slow speeds. A "bikeway" is a generic term for any road, street, path or way that in some manner is specifically designed for bicycle travel, regardless of whether such facilities are designated for the exclusive use of bicycles or are to be shared with other transportation modes. The Federal and State transportation system recognizes three primary facilities: Bicycle Paths (Class I), Bicycle Lanes (Class II), and Bicycle Routes (Class III). In addition, the City's Bicycle Plan established a new classification titled, "Bicycle-Friendly Street."

Figure 25 offers an illustration of the different types of bicycle classes (classes I, II, III). Class I bicycle paths provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross-flow by motorists minimized. Dual use by pedestrians and bicycles is undesirable, and the two should be separated wherever possible. Class II bicycle lanes provide a striped lane for one-way bike travel on a street or highway. Class III Bicycle Routes and Bicycle-Friendly Streets are in-road bikeways where bicycles and motorists share the roadway. They are typically intended for streets with low traffic volumes, signalized intersections at crossings, or wide outside lanes. More specifically, bicycle-friendly streets are local and/or collector streets that include at least two traffic calming engineering treatments such as narrowed roads or speed bumps in addition to signage and shared lane markings.

Figure 26 illustrates existing and funded bikeways as of 2010, which is the most updated information to date from the City of Los Angeles.

Figure 25: Bike Classes

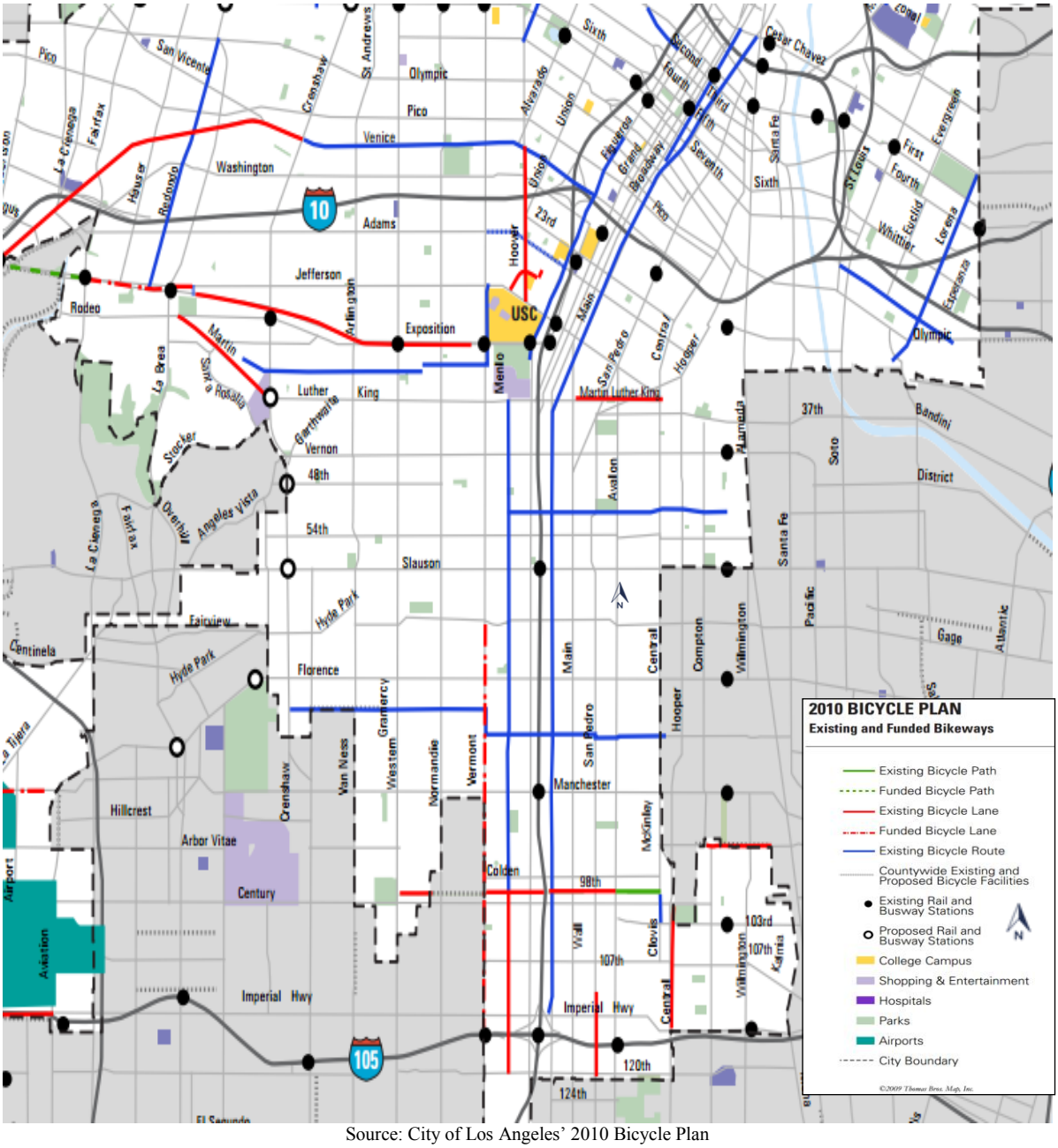
Bicycle Path (Class I)

Bicycle Lane (Class II)

Bicycle Routes and Bicycle-Friendly Streets (Class III)

Source: City of Los Angeles' 2010 Bicycle Plan

Figure 26: Existing and Funded Bikeways 2010



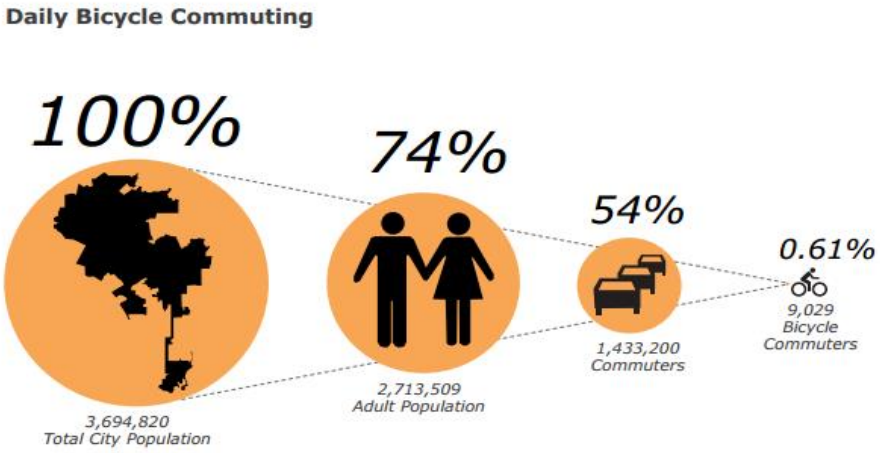
Source: City of Los Angeles' 2010 Bicycle Plan

According to the City of Los Angeles' Bicycle Plan (2010), the Census data does provide information about the number of bicyclists commuting to work each day. Based on the 2000 Census the City had 3,694,820 residents of which 2,713,509 were adults (18 years of age or older). Of this adult population 1,433,200 are categorized by the Census as commuters, and of these commuters 9,029 or 0.61% commuted to work by bicycle each day. Since 2000 interest in bicycling has continued to grow and the 2008 American Community Survey revealed that the City's share of bicycle commuting rose from its 2000 level of 0.61% to 0.90%, which is a full 48% increase in eight years.

Figure 27 indicates the daily bicycle commuting trend in the City of Los Angeles in 2010, which shows that only 0.61% of commuters use a bicycle. Figure 28 shows that 75% of bicycle riders ride for recreation.

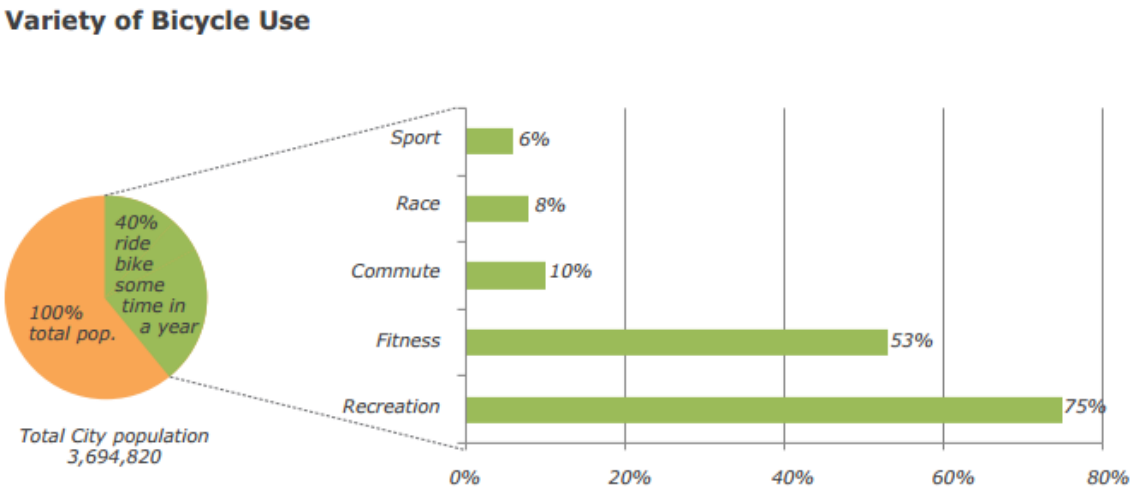
The Southern California Association of Governments (SCAG) developed a Regional Travel Survey (Survey) to evaluate the variety of transportation trips taken in Los Angeles County and the modes used for the trips. The 2008 American Community Survey also revealed that in Los Angeles County 1% of daily trips were made by bicycle. Assuming again the City's adult population of 2,713,509 and that each person typically makes 3.79 trips per day for a total of 10,039,983 trips, than 1% of those trips would equal 100,300 bicycle trips each day.

Figure 27: Daily Bicycle Commuting in the City of Los Angeles, 2010



Source: City of Los Angeles' 2010 Bicycle Plan

Figure 28: Variety of Bicycle Use, 2010



Source: City of Los Angeles' 2010 Bicycle Plan

Compliance with Americans with Disabilities Act (ADA)

One of Caltrans' goals is Mobility and to maximize transportation system performance and accessibility. In support of this goal, Caltrans created the ADA Infrastructure Program under its Maintenance and Operations Program. The objective of the ADA Infrastructure Program is to make Caltrans infrastructure equally accessible to persons with disabilities. Caltrans does not discriminate on the basis of disability and believes in providing equal access to all of its infrastructure, programs, services, and activities. Caltrans is committed to working with its partners to identify and address access barriers to its infrastructure.

In accordance with Title II of the Americans with Disabilities Act of 1990, Caltrans has designated a Statewide ADA Coordinator who is responsible to coordinate ADA compliance across the State. Caltrans has also established a website where access barriers can be reported.

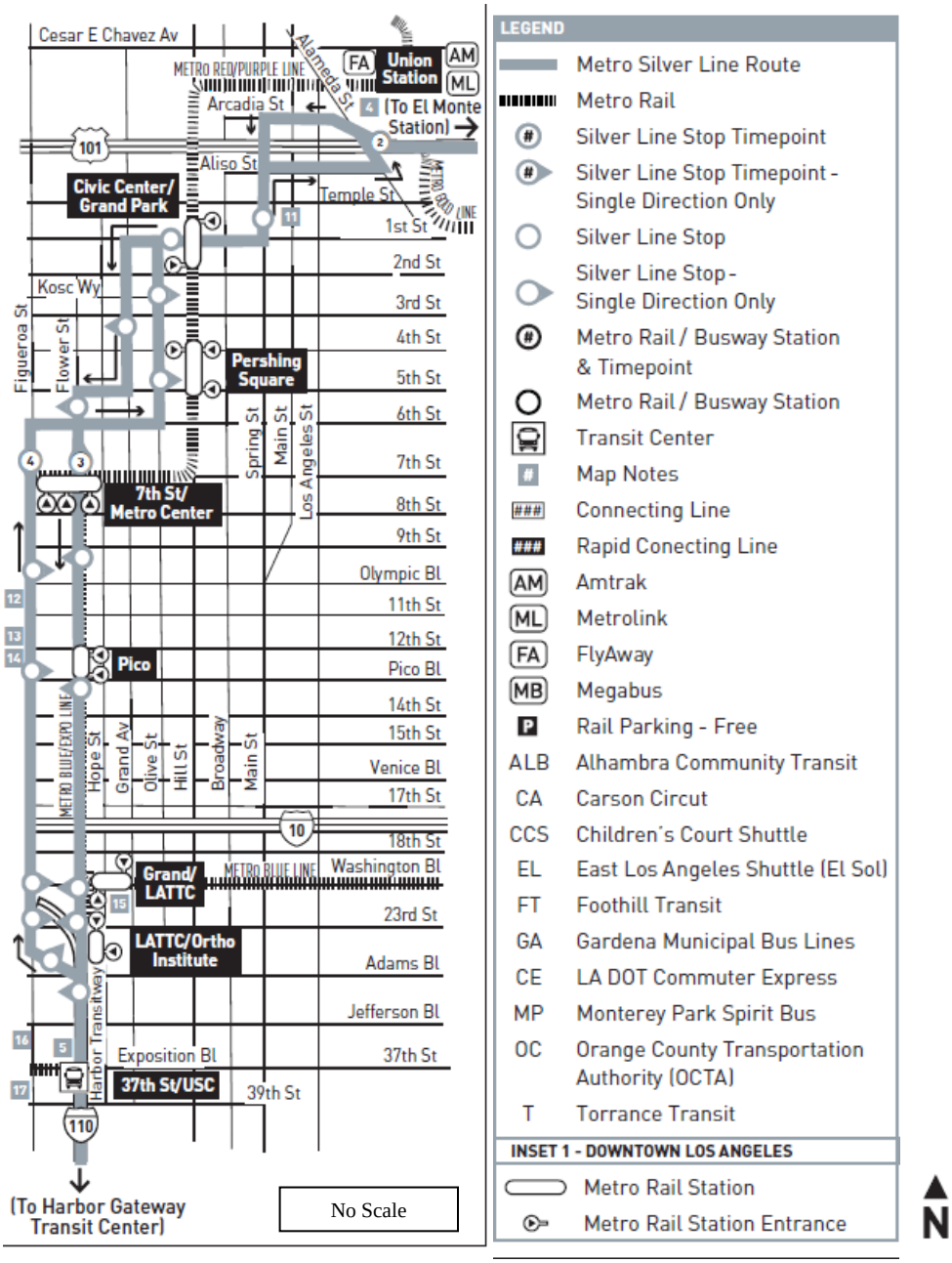
Public Transit (Trains and Buses)

The proposed project is near the Metro Expo Line, which connects the Westside by rail to Downtown Los Angeles, Hollywood, South Bay, Long Beach, Pasadena, and dozens of points in between. The Metro Expo Line is powered electrically with overhead catenary wires. There are two Expo Line stations near the proposed project. The first is Jefferson/USC Station, located at 3214 S Flower St., and the second is the Expo Park/USC Station, located at 661 Exposition Blvd.

Currently, there is a bus stop on Figueroa Way within the project study area which accommodates the following bus lines. Refer to Figure 29 for a map of public transportation locations:

- Metro Silver Line
- LADOT commuter express lines 438 and 448
- OCTA lines 701 and 721

Figure 29: Public Transportation Locations



Source: Metro Silver Line Schedule (June 2015)

Environmental Consequences

Alternative 1 (No Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alterative 2 (Build Alternative):

Potential Construction Impacts

Traffic and Transportation

Traffic circulation impacts during construction may occur as a result of the proposed Build Alternative, but will be minimized to the greatest extent practicable with the incorporation of minimization measure T-1.

Pedestrian and Bicycle Facilities

Impacts to pedestrian and bicycle facilities are anticipated during construction due to the closure of Figueroa Way to all traffic, specifically pedestrian and bicyclists. These impacts will be minimized to the greatest extent practicable with the incorporation of minimization measure T-1.

Public Transit (Trains and Buses)

The Expo Line will not be impacted by the proposed Build Alternative, and coordination with Metro Rail Operations will occur during construction to avoid any impact to Expo Line operations. As Figueroa Way will be closed during construction, impacts to Metro Silver Line, OCTA lines 701/721, and LADOT commuter express lines 438 and 448 may occur. However, early coordination with Metro, OCTA and LADOT will occur to relocate and consolidate the impacted stop with an existing stop at the nearby intersection of Figueroa St. /23rd St, thereby minimizing an impact to service. Refer to minimization measure BUS-1.

Potential Operational Impacts

Traffic and Transportation

Tables 18 through 21 focus on current level of service and average delay in seconds in 2014, and future built out years 2018 as well as horizon year 2040. Although the LOS may go from and “F” to an “F,” by focusing on the average delay in seconds one can see a clear improvement in average delays with the implementation of the proposed Build Alternative. As illustrated in Tables 18 through 21, the average delays in 2018 and 2040 are improved in all analyzed intersections in both AM and PM peak hours when comparing the No-build 2018 and 2040.

Table 18: 2018 AM Peak Hours Level of Service (LOS)

Intersection	Average delay(in seconds)/2014 LOS	Average delay(in seconds)/LOS in 2018 (No-Build)	Average delay(in seconds)/LOS in 2018 (Build)
NB I-110 Off Ramp @ Adams Blvd.	170.9/**F**	216.7/**F**	111.4/**F**
Flower St. @ Adams Blvd.	58.7/**E**	119.8/**F**	18.0/B
Figueroa St. @ Adams Blvd.	54.1/D	135.7/**F**	91.7/**F**
Figueroa St. @ 23rd St.	47.5/D	58.2/**E**	49.9/D

Source: Traffic Report (April 2015)

Table 19: 2018 PM Peak Hours LOS

Intersection	Average Delay (in seconds)/2014 LOS	Average delay(in seconds)/LOS in 2018 (No-Build)	Average delay in seconds) /LOS in 2018 (Build)
NB I-110 Off Ramp @ Adams Blvd.	131.4/**F**	174.6/**F**	27.7/C
Flower St. @ Adams Blvd.	65.8/**E**	116.6/**F**	44.6/D
Figueroa St. @ Adams Blvd.	44.3/D	114.8/**F**	80.0/**E**
Figueroa St. @ 23rd St.	23.3/C	52.0/D	34.0/C

Source: Traffic Report (April 2015)

Table 20: 2040 AM Peak Hours LOS

Intersection/ Number	Average Delay (in seconds)/ 2014 LOS	Average delay(in seconds)/LOS in 2040 (No-Build)	Average delay in seconds) /LOS in 2040 (Build)
NB I-110 Off Ramp @ Adams Blvd.	170.9/**F**	264.6/**F**	116.7/**F**
Flower St. @ Adams Blvd.	58.7/**E**	147.7/**F**	18.9/B
Figueroa St. @ Adams Blvd.	54.1/D	155.7/**F**	117.0/**F**
Figueroa St. @ 23rd St.	47.5/D	85.4/**F**	77.3/**E**

Source: Traffic Report (April 2015)

Table 21: 2040 PM Peak Hours LOS

Intersection/ Number	Average Delay (in seconds)/ 2014 LOS	Average delay(in seconds)/LOS in 2040 (No-Build)	Average delay in seconds) /LOS in 2040 (Build)
NB I-110 Off Ramp @ Adams Blvd.	131.4/**F**	197.8/**F**	26.0/C
Flower St. @ Adams Blvd.	65.8/**E**	135.3/**F**	46.8/D
Figueroa St. @ Adams Blvd.	44.3/D	143.3/**F**	125.0/**F**
Figueroa St. @ 23rd St.	23.3/C	63.2/**E**	33.6/C

Source: Traffic Report (April 2015)

Individual vehicles are modeled and displayed traversing a street network. The analyzed street network consist of vehicular traffic existing northbound HOT lane. Two scenarios were analyzed for the year 2018:

- **No-Build condition.** Vehicular traffic making left-turn onto Adams Blvd., and making a right-turn onto Figueroa St.
- **Build condition.** Vehicular traffic existing via proposed flyover ramp onto Figueroa St.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

Furthermore, the reduction in traffic congestion will potentially reduce traffic accidents at the study locations (NB I-110 off-ramp at Adams Blvd., Flower St. at Adams Blvd., and Figueroa St. at Adams Blvd.). Please note that the existing NB HOT lane at Adams Blvd. is a concentrated accident location as mentioned earlier in the purpose and need section of this document, the accident rate at this location between 10/01/2010 and 09/30/2013 is 0.23 slightly higher than the average accident rate, which is 0.21.

As seen in Tables 18 through 21, Alternative 2 will operate efficiently during AM/PM peak hours for future build-out year 2018 and horizon year 2040 as compared to the No-Build years 2018 and 2040. Impacts include traffic congestion/safety, which the proposed ramp will alleviate the existing and future traffic congestions at key analyzed intersections in the vicinity. The new ramp will also eliminate the existing choke point at Adams Blvd., thus eliminating travel delays. In addition, the new ramp will potentially decrease accident rates by minimizing queuing and traffic backup onto the freeway mainline.

To encourage carpooling, Metro offers rewards to customers who choose to carpool on the ExpressLanes. When a Metro ExpressLanes account holder carpools on the ExpressLanes, the Carpool Loyalty Program automatically enters them into a monthly drawing for a chance to win gift card rewards. Each month, 40 winners are selected from this pool of carpoolers-10 HOV2 winners for each corridor, and 10 HOV3+ winners for each corridor. 2-person carpools (HOV2) receive $20, and carpools of 3 or more people (HOV3+) receive $30 in the form of Visa gift cards, but they can also select to receive toll credits instead.

Also, the Metro ExpressLanes' Low-Income Assistance Plan (formerly called the Equity Plan) provides a discount to qualifying LA County residents who sign up for a Metro ExpressLanes account. Low-Income Assistance Plan account holders receive a $25 discount when they sign up, and also have their $1 monthly maintenance fee waived.

Since the inception of ExpressLanes, Metro has seen significant increases in carpool trips. In particular, of the trips exiting the I-110 ExpressLanes at Adams Blvd. two person carpools increased from 15,389 to 71,179 monthly trips and three person carpools increased from 5,847 to 38,561 monthly trips. The growth in carpools is such that more than half of all trips using the Adams Blvd. off ramp today are carpools.

In addition to transit subsidies, the Carpool Loyalty Program and Low Income Assistance Plan, Metro also grants net toll revenue, which is a toll revenue remaining after operations and maintenance expenses are paid for. These grants are awarded to projects improving mobility in the I-110 and I-10 corridors including roadway, active transportation, and transit projects. In 2014, over $20 million was granted and in 2016 Metro expects to award another $20-24 million.

Though single occupant vehicle trips using the Adams Blvd. off-ramp increased from 40,045 in November 2012 to 95,046 in November 2015, this represents less than half of the total number of monthly trips (204,786) in November 2015. It is likely many of these trips were not discretionary and without the ExpressLanes, would have been made in the general purpose lanes, increasing congestion for all travelers in the corridor. However, by providing a choice to use the ExpressLane the single occupant driver realizes significant travel time savings and the tolls generated are used to fund increased transit service, the net toll grant program, Carpool Loyalty Program and Low Income Assistance Plan, all of which would not be possible without the ExpressLanes.

Pedestrian and Bicycle Facilities

The closure of Figueroa Way may represent a significant impact to pedestrian and bicycle facilities; however, mitigation measure P&B-1 will be incorporated, which intends to redesign and repurpose Figueroa Way as a bicycle and pedestrian pathway. With the incorporation of this mitigation measure, the impact will be less than significant.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a “STOP” controlled approach. The project is proposing to install at this location the following improvements:

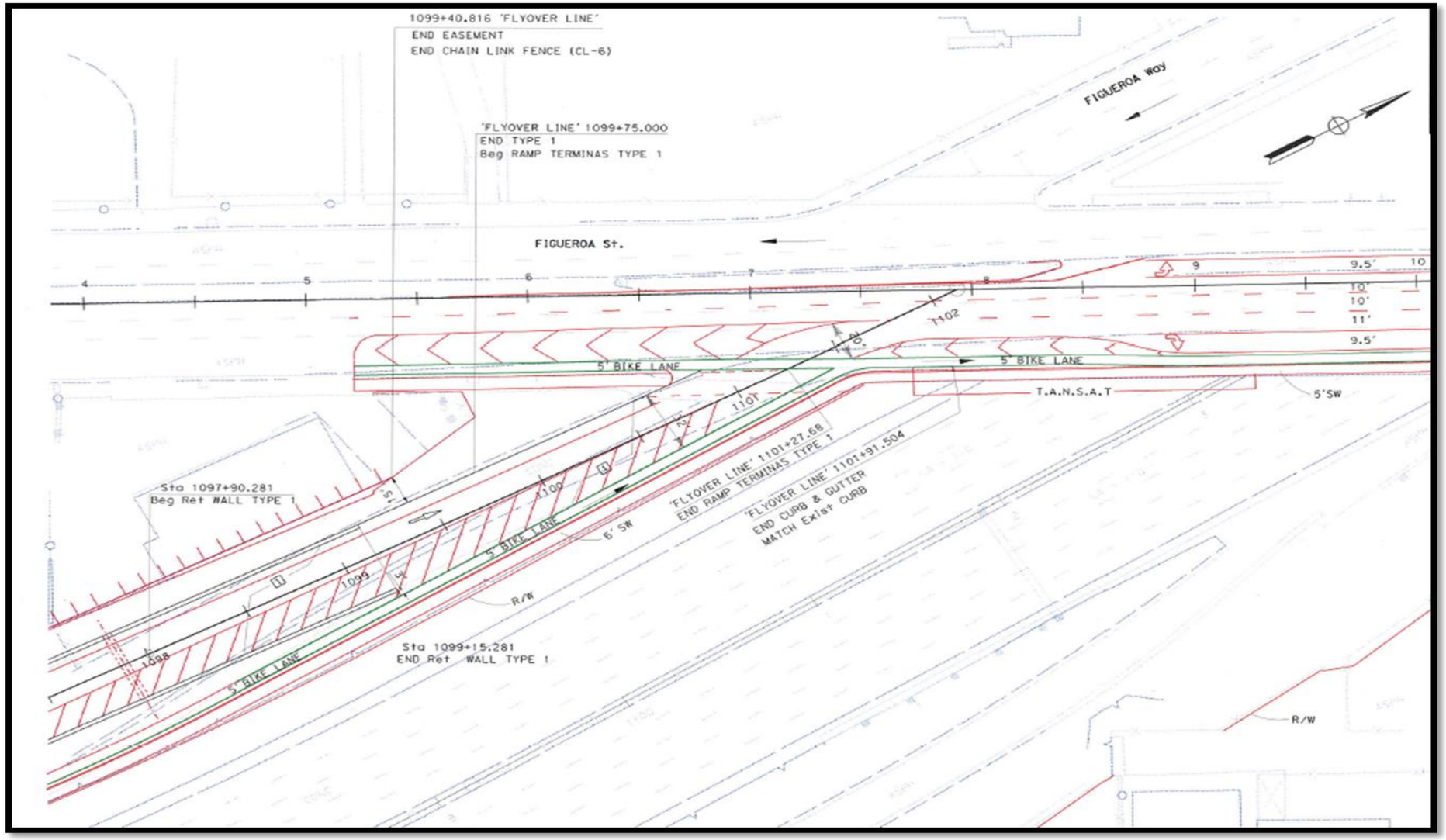
Pedestrian Hybrid Beacon: Also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a

vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

A detailed design will be developed in the design phase of the project, but refer to Figure 30 for a preliminary bike lane design for Figueroa Way onto Figueroa Street.

Figure 30: Preliminary Bike Lane Design (Figueroa Way onto Figueroa Street)



Source: Caltrans Design Team

Public Transit (Trains and Buses)

The Expo Line is not anticipated to be permanently impacted by the proposed project. As Figueroa Way will not be re-opened to traffic, the Metro/OCTA stop on Figueroa Way will remain relocated and consolidated with the existing stop on Figueroa St. and 23rd St. As this shift represents a distance of only 0.2 miles, this impact is not considered significant.

Metro provides transit subsidies to the Metro Silver Line, Foothill Transit, Torrance Transit, and Gardena Transit to increase the number of transit trips traveling on the ExpressLanes. As a result, each weekday 213 transit trips carrying approximately 6,450 passengers travel on the I-110 ExpressLanes, exit at Adams Blvd., and continue on to downtown Los Angeles. Ridership gains have been particularly strong on the Metro Silver Line, which has increased 25% from 89,000 monthly trips in November 2012 to 112,000 in November 2015.

Further, the total number of existing monthly trips Northbound (NB) 110 Express Lanes at Adams Blvd. has increased from 61,281 in November 2012 to 204,786 in November 2015. The elevated structure will decrease the demand on the HOT off-ramp at Adams Blvd. Currently, there are 1,600 trips exiting the Express Lanes at Adams Blvd. per weekday during the AM peak. If each trip saves approximately 101 seconds of delay, the total time savings would be 44.4 hours every morning.

Avoidance, Minimization, and/or Mitigation Measures

Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Mitigation P&B-1: Re-design Figueroa Way to encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a short cut to access the surrounding community.

Minimization BUS-1: The Metro Silver Line bus stop on Figueroa Way will be consolidated with the currently existing bus stop on Figueroa St. and 23rd St., 0.2 miles away.

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2.1.9 Visual/Aesthetics

Regulatory Setting

The National Environmental Policy Act of 1969 (NEPA) as amended establishes that the federal government use all practicable means to ensure all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings (42 United States Code [USC] 4331[b][2]). To further emphasize this point, the Federal Highway Administration (FHWA) in its implementation of NEPA (23 USC 109[h]) directs that final decisions on projects are to be made in the best overall public interest taking into account adverse environmental impacts, including among others, the destruction or disruption of aesthetic values.

The California Environmental Quality Act (CEQA) establishes that it is the policy of the state to take all action necessary to provide the people of the state "with…enjoyment of aesthetic, natural, scenic and historic environmental qualities" (CA Public Resources Code [PRC] Section 21001[b]).

Affected Environment

According to the FHWA Guidelines for the Visual Impact Assessment (VIA) of Highway Projects (January 2015), visual quality is an aesthetic issue. Aesthetics is the study of perceptual experiences that are pleasing to people. Visual quality is, therefore, the experience of having pleasing visual perceptions. Although background and former experiences make each individual's experience of visual quality unique, human perception of what constitutes a pleasing landscape is remarkably consistent, not only within a society but, across cultures.

A viewer observing an existing scene has a range of available responses that are inherent to all human beings. The FHWA VIA guidelines recognize three types of visual perception, corresponding to each of the three types of visual resources.

- When viewing the components of a scene's natural environment, viewers inherently evaluate the *natural harmony* of the existing scene, determining if the composition is harmonious or inharmonious
- When viewing the components of the cultural environment, viewers evaluate the scene's *cultural order*, determining if the composition is orderly or disorderly
- When viewing the project environment, viewers evaluate the coherence of the project components, determining if the project's composition is coherent or incoherent

According to the FHWA Guidelines for the Visual Impact Assessment of Highway Projects (January 2015), the first phase of the FHWA Visual Impact Assessment process is the establishment phase. The purpose of this phase is to answer three basic questions, which are included below along with their answers:

1. What is the visual character of the proposed project?

As stated in the Visual Impact Assessment (April 2015), the elevated structure will be constructed of concrete and its form defined by crisp lines. Further, the use of texture on the outer bridge railing will be explored in the structure design phase. It is anticipated that the structure color itself will be natural concrete gray. This will match the existing structure. If color is to be used it would be in the way of possible light post or fencing, which will also be explored in the design phase. The composition of the structure and associated facilities will promote a uniform appearance with the existing structure and roadway.

2. Are there any legal directives or social constraints that dictate the visual quality of what can be constructed?

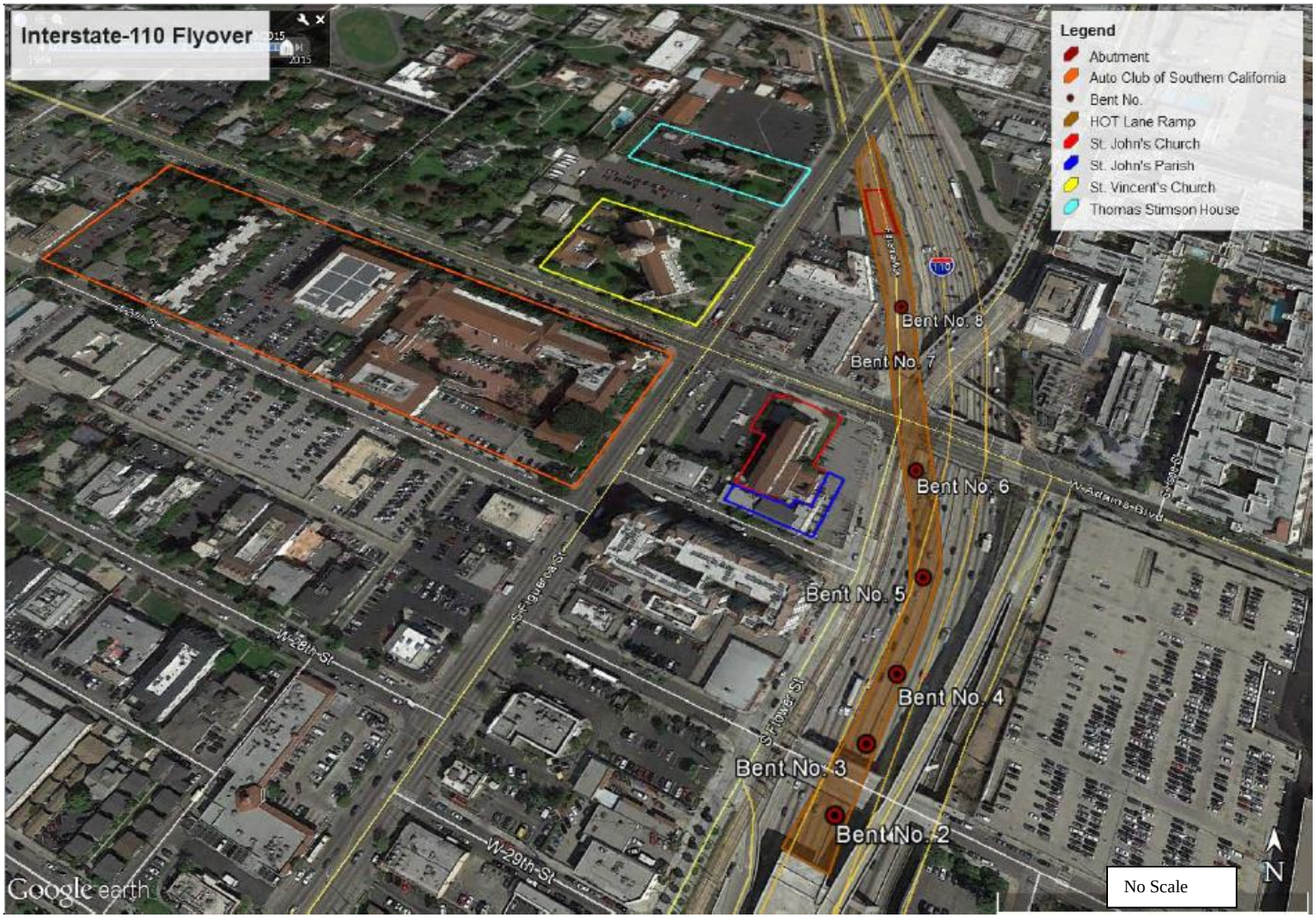
The west edge of the project area abuts the University Park Historical Preservation Overlay Zone. This designation seeks to protect and enhance the use of buildings, structures, natural features, and areas which are reminders of the City's history. Architectural treatment of the roadway, bridge, railings, and lighting should reflect the goals of the Historical Preservation Overlay Zone.

3. To what extent is the proposed project visible?

Viewer groups driving north on the HOT off-ramp would have views of the Downtown Los Angeles skyline in the middle ground. The Hollywood Hills and San Gabriel Mountains would constitute the background view. Views from the HOT roadway driving south in the middle ground would be of mid-rise building's rooftops and palm trees. Views of the background would be of rooflines from the University of Southern California campus. Viewer groups from the arterial streets from the west and east would see an elevated road structure. This is similar to the existing view from the terminus of the uncompleted HOT roadway at 28th St.

The existing landscape is manmade with ornamental vegetation and occasional street trees. The lay of the land within the corridor or project corridor is primarily flat and urban. The area is highly urbanized, and it is primarily a commercial area surrounded by some residential areas. According to the City's General Plan, the area is comprised of commercial, industrial, open space, and residential multiple family land use designations. Various types of building structures surround the project area, gas stations, strip malls, historical buildings, churches, and office buildings, which all make up the man-made visual resources. Single family residential units are sparse in the immediate area adjacent to the project location. The nearest single family residential area is approximately a quarter mile to the west. There are several historical buildings near the proposed elevated structure which are mapped in Figure 31. The historic buildings include the Auto Club of Southern California (pictured in Figure 32), St. John's Cathedral Episcopal Church (pictured in Figure 33), St. Vincent Catholic Church (pictured in Figure 34), and Thomas Stimson House (pictured in Figure 35), but none of the buildings will be directly impacted by the project.

Figure 31: Map of Key Views from Historical Properties near the Proposed Project

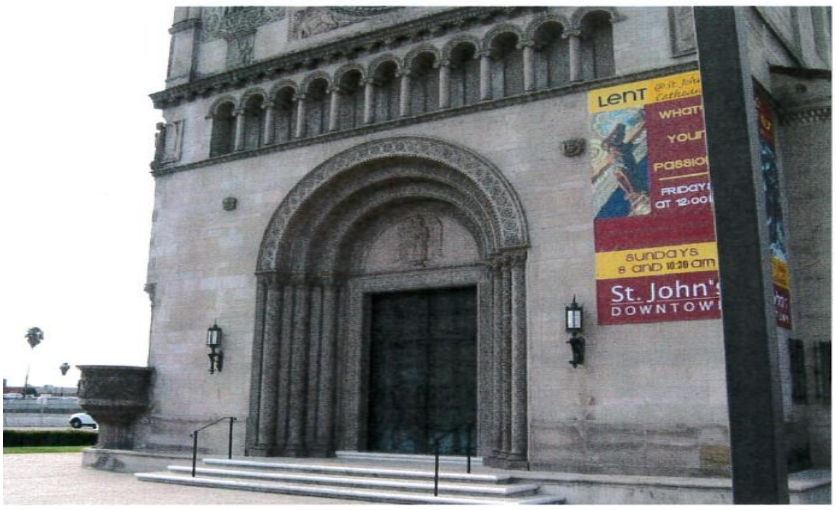


Source: Cultural Resources Unit (August 2015)

Figure 32: Auto Club of Southern California

Source: Visual Impact Assessment (April 2015)

Figure 33: St. John's Cathedral Episcopal Church



Source: Visual Impact Assessment (April 2015)

Figure 34: St. Vincent's Catholic Church

Source: Visual Impact Assessment (April 2015)

Figure 35: Thomas Stimson House

Source: Findings of Effect (August 2015)

Figure 36 is a photograph of the existing condition and Figures 37-40 show four visual simulations that focus on potential design concepts.

Figure 36: Existing Condition (view from Figueroa Way towards Adams Blvd. /Flower St.)

Source: Field Visit (July 2015)

Figure 37: Potential Design Concept 1

View from Adams Blvd. & Figueroa Way includes St. John's Church
Source: Caltrans Headquarters Bridge Aesthetics Unit

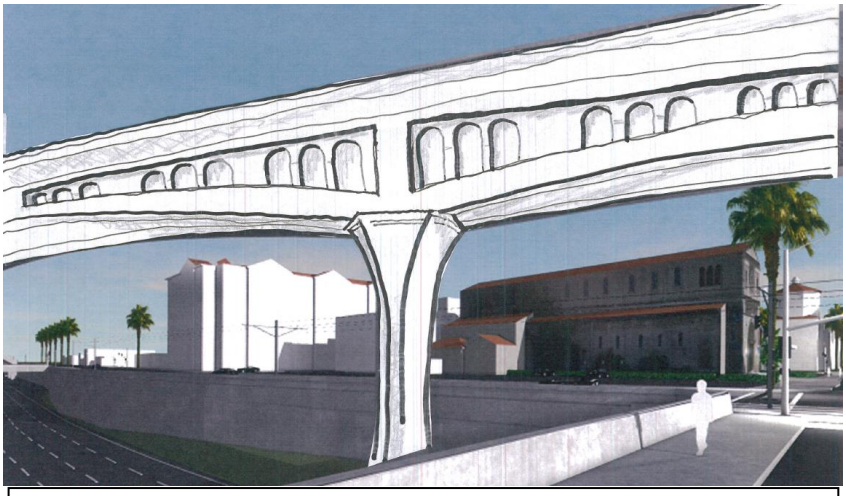
Figure 38: Potential Design Concept 2

View from Adams Blvd. & Figueroa Way includes St. John's Church
Source: Caltrans Headquarters Bridge Aesthetics Unit

Figure 39: Potential Design Concept 3

View from Adams Blvd. & Figueroa Way includes St. John's Church
Source: Caltrans Headquarters Bridge Aesthetics Unit

Figure 40: Potential Design Concept 4



View looking West from Adams Blvd
Source: Cultural Resources Unit

Environmental Consequences

Alternative 1 (No-Build Alternative): Existing condition would remain; therefore, no impact would occur.

Alterative 2 (Build Alternative):

Potential Construction Impacts

Construction impacts to visual resources are not anticipated as a result of the proposed Build Alternative.

Potential Operational Impacts

This is an urban area, so the proposed project would not intrude the existing visual character. The project is not on a designated Scenic Highway, nor is the highway eligible for designation. There are no Scenic Highways in close proximity to the project that would be impacted. There are no potential visual effects to shoreline and inland coastal resources. The project does not have the potential to affect scenic or visual qualities that are afforded protection under the applicable coastal jurisdictional agencies. The visual character of the proposed project will be designed to be compatible with the existing visual character of the corridor.

No impacts to visual resources are anticipated as a result of the proposed Build Alternative. Resource change (changes to visual resources as measured by changes in visual character and quality) will be low. Neighbors (people with views to the road) and highway users will not be affected by the proposed project. There are two primary viewer groups, those who would see the elevated structure from the local streets and buildings and those on the structure in vehicles. The primary viewer groups from arterial streets and buildings would be students, office workers, and shoppers. The primary viewer group of the elevated structure would be commuters and riders on buses. The completion of the Expo Line and the nearby 23rd Street Station has added additional pedestrian traffic to the area. These pedestrians walking to and from the station would be an additional viewer group. Their view of the elevated structure would be primarily as passengers on the light rail train. The train tracks across Adams Blvd. and West 28th Street are at grade and the structure would be elevated above. It is anticipated that the average response of all viewer groups will be low.

There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Please refer to Table 22 which discusses impacts on visual resources for both alternatives.

Table 22: Impacts on Visual Resources

Questions (Yes or No)	Alternative 1: No-Build	Alterative 2: Build
Clear change to visual environment?	No	No, the current setting is highly urbanized and disturbed. Further, the proposed structure will be designed to fit the surrounding community.
Project on designated scenic highway?	No	No
Scenic resource adversely affected?	No	No
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No	No

Source: Visual Impact Assessment (April 2015)

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, and/or mitigation measures are required.

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2.1.10 Cultural Resources

Regulatory Setting

The term "cultural resources" as used in this document refers to all "built environment" resources (structures, bridges, railroads, water conveyance systems, etc.), culturally important resources, and archaeological resources (both prehistoric and historic), regardless of significance. Laws and regulations dealing with cultural resources include:

The National Historic Preservation Act (NHPA) of 1966, as amended, sets forth national policy and procedures for historic properties, defined as districts, sites, buildings, structures, and objects included in or eligible for listing in the National Register of Historic Places. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and to allow the Advisory Council on Historic Preservation the opportunity to comment on those undertakings, following regulations issued by the Advisory Council on Historic Preservation (36 Code of Federal Regulations (CFR) 800). On January 1, 2014, the First Amended Section 106 Programmatic Agreement (PA) between the Advisory Council, the Federal Highway Administration (FHWA), State Historic Preservation Officer (SHPO), and the Department went into effect for Department projects, both state and local, with FHWA involvement. The PA implements the Advisory Council's regulations, 36 CFR 800, streamlining the Section 106 process and delegating certain responsibilities to the Department. The FHWA's responsibilities under the PA have been assigned to the Department as part of the Surface Transportation Project Delivery Program (23 United States Code [USC] 327).

Historical resources are considered under the California Environmental Quality Act (CEQA), as well as CA Public Resources Code (PRC) Section 5024.1, which established the California Register of Historical Resources. PRC Section 5024 requires state agencies to identify and protect state-owned resources that meet the National Register of Historic Places listing criteria. It further specifically requires the Department to inventory state-owned structures in its rights-of-way. Sections 5024(f) and 5024.5 require state agencies to provide notice to and consult with the State Historic Preservation Officer (SHPO) before altering, transferring, relocating, or demolishing state-owned historical resources that are listed on or are eligible for inclusion in the National Register or are registered or eligible for registration as California Historical Landmarks.

Affected Environment

Caltrans completed various cultural resources technical reports for Section 106 compliance. Caltrans completed an Archaeological Survey Report (ASR) in February 2015. The Historic Property Survey Report/Historic Resources Evaluation Report (HPSR/HRER) was prepared in April 2015 and based on comments, a Supplemental HPSR/HRER was completed in May 2015. In August 2015, a Finding of Adverse Effect (FOE) was completed.

In early 2015, various groups requested to be consulting parties. In March of that year, Caltrans granted consulting party status to West Adams Heritage Association (WAHA), St. John's Cathedral, California Preservation Foundation and Los Angeles Conservancy.

After receiving comments from Section 106 consulting parties (WAHA, St. John's Cathedral, California Preservation Foundation, and Los Angeles Conservancy) and discussions with the State Historic Preservation Officer (SHPO), the Area of Potential Effects (APE) was expanded and a supplemental HPSR/HRER was completed and received SHPO concurrence. FOE received SHPO review. SHPO determined that the proposed project could cause adverse effects to two historic properties. Three properties would be affected by the proposed project, but those effects are not expected to be adverse.

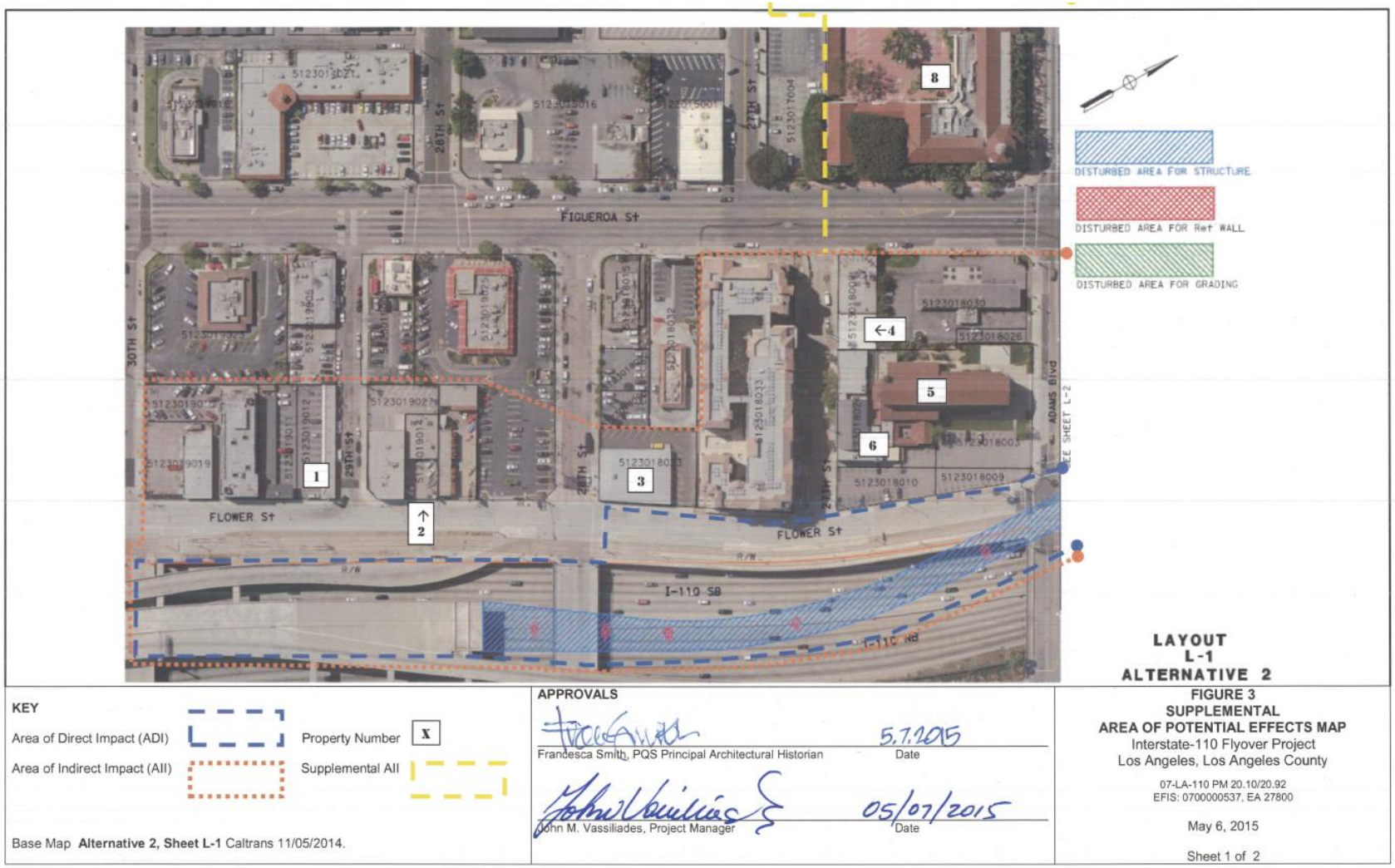
Area of Potential Effects (APE)

The original APE for this project was established in consultation with Mirna Dagher, former Caltrans Project Manager, on November 20, 2014. The APE maps are located in Appendix A of the HRER. The project APE map was prepared to ensure identification of significant historical, architectural, and archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (National Register) that may be directly or indirectly affected by the proposed project, in compliance with 36 Code of Federal Regulations (CFR) Part 800.16(d).

The direct APE encompasses all ground disturbances associated with the project. The indirect APE extends outward from the direct APE to include parcels that directly face the proposed project and may be affected by its construction or implementation. The indirect APE also includes parcels that could have indirect effects, including visual, noise or vibration effects caused by proposed project construction or implementation.

In response to comments from consulting parties, and following a conversation with SHPO reviewers, a supplemental APE was prepared to include additional properties in the indirect APE that may be in view of the proposed flyover. The supplemental APE was established in consultation with John Vassiliades, Project Manager, on May 6, 2015. The proposed project is located in a combination of industrial, commercial, office, retail and urban residential setting. Refer to Figure 41 for most updated APE Map

Figure 41: APE Map



KEY

Area of Direct Impact (ADI)

Area of Indirect Impact (AII)

Property Number X

Supplemental AII

Base Map **Alternative 2, Sheet L-2** Caltrans 11/05/2014.

SUPPLEMENTAL
AREA OF POTENTIAL EFFECTS MAP
Interstate-110 Flyover Project
Los Angeles, Los Angeles County

07-LA-110 PM 20.10/20.92
EFIS: 0700000537, EA 27800

May 6, 2015

Sheet 2 of 2

Of the four properties in the supplemental APE, each warranted consideration for National and California Register eligibility. Three of the four properties in the supplemental APE did not meet the criteria for exemption under the PA, Attachment 4, and were previously evaluated for historic significance. They are:

- **Automobile Club of Southern California**, 2601 South Figueroa Street (alternate addresses: 650 West Adams Boulevard and 661 West 27th Street), determined eligible for listing in the National Register on February 7, 1992 (FHWA).
- **St. Vincent de Paul Church**, 601 West Adams Boulevard, determined eligible for listing in the National Register on June 21, 1982 (FHWA).
- **Stimson House**, 2421 South Figueroa Street, listed in the National Register on March 30, 1978.

Each of the resources listed above is a historic property as defined in Section 106 of the National Historic Preservation Act. All three are cultural resources for NEPA purposes. They are also considered CEQA historical resources.

Research Methods

For the cultural resources technical reports, Caltrans conducted a record search at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) at the California State University, Fullerton on November 5, 2014. The record search included a review of all recorded prehistoric and historic-era archaeological sites within a 1.0-mile radius of the study area, a review of all recorded historic-era built environment resources within the APE, as well as a review of known cultural resource surveys and technical reports within the 1.0-mile radius. Sources consulted while conducting the records search include:

- National Register of Historic Places
- California Register of Historical Resources
- California Historical Landmarks
- California Points of Historical Interest
- California Historic Property Data File for Los Angeles County, dated April 5, 2012
- Department of Parks and Recreation Series 523 Forms, including Built Environment
- Archaeological Site Records

The records search identified 55 studies within 1.0-mile of the study area (project ASR includes a complete bibliography). Of these, four (4) studies include portions of the Area of Potential Effects. According to these results, the Study Area was previously surveyed for archaeological resources in 1999, but no prehistoric or historic-era archaeological resources were identified as a result of that study.

The following sources among others were consulted in the process of preparing the historic context statement and evaluating historic-era properties in the APE boundaries:

- Caltrans *State and Local Bridge Survey* (1989 and updates, December 2015)
- *Los Angeles Times* Index (October- December 2014)
- Los Angeles Public Library, California Index and Photograph Collection (January 2015)
- City of Los Angeles Department of Building & Safety (December 2014) and
- University of Southern California, Digital Archives (January 2015)

Consultation and Interested Parties

Native American Heritage Commission, Tribes, Groups, and Individuals

During the identification phase, Caltrans cultural resources staff sent a request for a search of the Sacred Lands File to the Native American Heritage Commission (NAHC). The letter requested information about sacred or traditional cultural properties that may be located in the identified Project Study Area. Katy Sanchez, NAHC Program Analyst replied stating that Sacred Lands file search did not result in identification of any sacred lands within the proposed Study Area. With it she provided a list of local groups and individuals to contact for further information regarding local knowledge of sacred lands or other Native American cultural resources.

Caltrans cultural resources staff sent letters to six of the nine Native American groups and individuals on the list provided by the NAHC. No address was provided for the other three individuals, but two were contacted by telephone. A total of eight of the nine Native American groups and individuals were asked to provide pertinent information or to express any concerns they may have about the proposed project. Comments from three individuals were received in response to Caltrans' request for information letters. Andrew Salas stated that the Study Area may be sensitive. Anthony Morales stated that the Area is sensitive. Both Salas and Morales recommend monitoring. John Tommy Rosas said that he was not concerned about the project and it is not in a sensitive area. The results of consultation with Native American representatives were detailed in Appendix B of the ASR.

Although two of the Native Americans contacted said the area was sensitive, no archaeological resources or specific Traditional Cultural Places were identified in the project's direct APE, which is considered to have a low potential to encounter buried archaeological deposits.

Historic Groups

Efforts to include the public in the Section 106 process have been made throughout this project study. During the cultural resources identification phase, letters requesting information on resources that may not be readily apparent were sent to the City of Los Angeles, Office of Historic Resources, Department of City Planning, Los Angeles Conservancy, Los Angeles City Historical Society, Historical Society of Southern California, and WAHA.

On October 7, 2014, a courtesy meeting was initiated by Caltrans staff with representatives of St. John's Cathedral because of the proximity of St. John's Episcopal Church to the proposed project. It was held at the Caltrans District 7 office with St. John's Cathedral leaders, Metro and Caltrans staff (refer to Appendix B of the FOE for a copy of the agenda). In the meeting, copies of letters sent in

2013 in response to the Notice of Preparation were provided to Caltrans. An overview of the project, its proposed schedule and the Section 106 process were provided by various members of Caltrans and Metro staff.

Shortly after, St. John's Cathedral held an "informational forum" on December 3, 2014, and requested Caltrans and Metro's presence. A presentation of information regarding the project was requested. Given the early stages of the project development, the information presented at this workshop was preliminary. The information provided at this meeting included funding, history of the project as well as purpose and need, project development/environmental process, the proposed build alternative, traffic, visual resources overview, historic properties and Section 106 compliance as well as the project schedule (refer to Appendix B of the FOE for the invitation and agenda). Questions from the public were answered to the extent possible at that point in project development.

At the informational forum in December 2014, one of the cultural resources-related questions was in reference to consulting parties. Two months later, letters requesting consulting party status were received from various parties (refer to Appendix C and Table 3 of the FOE). The project APE map and project description were sent via e-mail to each consulting party requestor as noted below. The project HPSR and HRER were circulated to consulting parties. Based on comments received, and following a conversation with SHPO staff, a Supplemental APE map, Supplemental HPSR and Supplemental HRER technical reports were submitted to SHPO as well as to consulting parties.

An additional meeting was held on April 22, 2015 to give Section 106 consulting parties the opportunity to discuss potential project design alternatives with Caltrans and Metro staff. Caltrans invited all consulting parties and presented four proposed design concepts for the flyover. The meeting was attended by members of the Project Design Team (PDT) with two representatives each from WAHA and St. John's Cathedral, and one from the Los Angeles Conservancy. As a courtesy, City of Los Angeles Office of Historic Resources and Council District 9 staff were included. No representatives of California Preservation Foundation attended. A PowerPoint presentation prepared by the PDT was presented. It briefly defined Section 106 and "historic properties," described the Section 106 process, defined historic properties in the project original APE and adverse effects, identified the current project status, further defined consulting and "other consulting parties." During the discussion, Caltrans staff emphasized that it was important for consulting parties as well as agency staff to acknowledge and understand the others' goals. Visual simulations of four design concepts were presented including views east, west, south with "bird's eye," as well as other view variations. After the presentation, a survey was distributed to poll attendants on which proposed design concept was preferred. None were identified as a preferred design alternative nor did attendees provide Caltrans with alternative design ideas that would be acceptable to the consulting parties. A few attendees recommended park facilities in the area beneath the proposed flyover.

On Jan 15, 2016, letters were sent to all consulting parties seeking constructive ideas regarding project mitigation. The only response was from WAHA offering the following recommendations as mitigation:

> Support the no build alternative, examine a surface street solution that improves traffic flow without the impacts of a concrete flyover, examine an underground in-cut solution as was developed in the 1950s due to the influence of Estelle Doheny and St. Vincent's importance, examine ramp solutions that do not impact any historic areas or area north of Adams Boulevard, embrace your own adopted goals of "Sustainability, Livability and Economy: Make long-lasting, smart mobility decisions that improve the environment, support a vibrant economy, and build communities, not sprawl," be "A performance-driven, transparent and accountable organization that values its people, resources and partners, and meets new challenges through leadership, innovation and teamwork," find a "context sensitive solution" pursuant to Caltrans Director's Policy DPP-22, Continue with the 4(f) process to explore impacts and alternatives, begin an EIR process to make fact based decision and gain more information and knowledge regarding the environmental impacts, embrace Caltrans earlier 1990 decision that where the exit ramp exits now is indeed a preferable alternative to an exit that reaches to 23rd street and the historic neighborhood, involve the ACHP and seek their advice on impacts, alternatives and mitigations. (Jean Frost to Francesca Smith, February 10, 2016).

No other responses were received.

On April 12, 2016, an in-house meeting was held with SHPO, California Office of Historic Preservation (OHP) and Caltrans Headquarters (HQ) staff, and ACHP staff. Caltrans convened an informal meeting in field later that day with consulting parties, State Historic Preservation Officer, California Office of Historic Preservation and Advisory Council and HQ.

On August 19, 2016, Caltrans transmitted the draft MOA to consulting parties and requested comments The ACHP declined consultation that same day. A letter response was received from WAHA on September 6, 2016 offering the following recommendations as mitigation: "The only acceptable mitigation step should be support of the no build alternative and examining a surface street solution that improves traffic flow without the impacts of a concrete flyover" (Jean Frost to Francesca Smith). No comments were made regarding the content of the draft Memorandum of Agreement.

The MOA was revised by HQ staff on January 3, 2017 and was transmitted via e-mail to consulting parties the following day for comments.

On January 20, 2017 Caltrans held a meeting with consulting parties and SHPO, OHP staff, a CPF representative and HQ on the telephone. Ken Bernstein, manager of City of Los Angeles Office of Historic Resources attends and asks to be included in future discussions. St. Johns' Cathedral invited their development consultant and developer. The developer verbally disclosed proposed plans in the meeting for a large, market-rate hotel complex to be built on St. John's Episcopal Church block surrounding the existing church. St. John's representative, Rev. Dan Ade stated that they would have "no use" for preservation plans unless they were completed by September 2017.

After consideration of St. John's Episcopal Church rejection of preservation plans for St. John's Episcopal Church and St. John's Episcopal Church Parish Hall, the MOA was revised on August 18, 2017 by deletion of the stipulation that included those documents' preparation. That same day, Caltrans transmitted those revisions to the draft MOA to consulting parties, HQ and OHP staff and requested additional ideas regarding mitigation measures with a deadline of September 1, 2017.

After no responses were received, Caltrans sent an e-mail extending the deadline for comments to September 6, 2017. In response, WAHA sent an e-mail to Caltrans staff on September 5, 2017 that stated "The more recent draft remains unacceptable and WAHA's previous comments remain valid" (Jean Frost to Francesca Smith). No other responses were received.

In a conference call among Caltrans District 7 staff and OHP staff in January 2018, one additional meeting with consulting parties was recommended. That meeting took place on January 31, 2018, and an additional phone application (app) mitigation measure intended to be a public benefit was discussed. Based on consulting party comments, the area of properties included in the app was increased. Consulting parties were afforded two additional weeks to recommend mitigation measures, ending on February 14, 2018.

No recommendations were received during that two-week period regarding additional mitigation measures and the revised draft MOA with a larger area for the phone app mitigation measure was circulated to signatory parties, invited signatories and consulting parties. No comments have been received.

Field Methods

Archaeological Survey

Once the APE was defined, a Caltrans archaeologist conducted a windshield survey of the entire project area and an intensive pedestrian foot survey to account for the Area of Direct Impact (ADI) within the direct APE. The purpose of the archaeological survey was to locate, record, and evaluate archaeological resources within the study area. During the intensive pedestrian survey, any areas of exposed ground surface for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, fire-affected rock, prehistoric ceramics), soil discoloration that might indicate the presence of a prehistoric cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations, wells, mines) or historic debris (e.g., metal, glass, ceramics). One transect was walked over the middle of each of the three unpaved areas. Due to the limited width of the unpaved areas, only one transect was necessary at each area with visibility.

Reconnaissance-Level Built Environment Survey

Once the APE was defined, staff architectural historians conducted a reconnaissance-level survey to account for all properties in the APE. The reconnaissance phase was completed using a list of all parcels in the project APE. This determined, in part, which properties would be studied in further detail and to exclude properties which met the requirements in the PA Attachment 4, thus requiring no further evaluation.

Additional background research to confirm and/or corroborate building construction dates was performed through the Los Angeles County Tax Assessor's Office and/or City of Los Angeles Department of Planning & Building Research, as well as review of area maps. Normally properties completed before 1965, which have not been substantially altered, and are recognizable to what may have been their periods of significance may be, were evaluated for National and California Register eligibility, using criteria A–D for National and criteria 1–4 for the California Register. Those properties were the survey population for the purposes of the report. That survey population is identified in the HRER and supplemental HRER and includes five properties.

Intensive-Level Built Environment Survey

Intensive surveys were conducted in December 2014, and May 2015 once reconnaissance surveys had identified properties that could not be exempt for evaluation according to Attachment 4 of the PA. Intensive surveys included properties which were found to require evaluation for historic significance (including "borderline" properties, or those which may or may not ultimately be intensively evaluated). For properties being evaluated, generally, all salient existing building permits were reviewed and noted.

In order to make professional judgments regarding historic significance, National and California Register criteria for evaluation, along with appropriate integrity assumptions, were applied.

The results of various other surveys in the area were reviewed including:

- Cultural Resources Documentation Report: Expanded Hoover Redevelopment Area (Community Redevelopment Agency of the City of Los Angeles (CRA/LA) 1985)
- Historic Architecture Survey Harbor Freeway Transitway/Northern Terminus to the I-110 Harbor Freeway Transitway (Caltrans 1991)
- Northern Terminus to the I-110 Harbor Freeway Transitway: Supplemental Historic Architecture Survey Report (Caltrans 1991)
- Northern Terminus to the I-110 Harbor Freeway Transitway: Finding of Effect Re Evaluation (Caltrans 1994)
- Council District Nine Revitalization/Recovery Program Final Environmental Impact Report (City of Los Angeles 1995)
- Mid-City/Exposition Corridor Light Rail Transit Project (Metro 2004)
- Reconnaissance Level Survey (CRA/LA 2005) Survey LA: Historic Resources Survey Report of the Southeast Los Angeles Community Plan Area (City of Los Angeles Department of City Planning, Office of Historic Resources 2012)

For this project, both previously identified historic resources and previously unidentified properties were field checked and evaluated for historic significance, according to National and California Register criteria. Resources subject to review were not limited to buildings, but included structures, objects and bridges and linear resources. Previously unidentified areas that might qualify as historic districts were considered for eligibility as well.

Description of Historic Properties

Each of the resources described below is a "historic property" as defined in Section 106 of the NHPA. St. John's Episcopal Church and St. John's Church Parish Hall are each cultural resources for NEPA purposes. Both are also considered historical resources as defined in CEQA. In the APE map approved on November 20, 2014 the following properties are considered historically significant:

- **St. John's Episcopal Church 510-518 West Adams Blvd., Los Angeles.** This church was listed in the National Register on May 5, 2000. It is also locally designated as a Historic-Cultural Monument (#516, January 22, 1991). The property is listed in the California Register as well.
- **St. John's Church Parish Hall, 515-517 West 27th St., Los Angeles.** St. John's Church Parish Hall was determined eligible for listing in the National Register on September 24, 2002 through the Section 106 process. It is therefore listed in the California Register.

Each of the resources described below is a historic property as defined in Section 106 of the NHPA. All three (3) are cultural resources for NEPA purposes and are also considered historical resources as defined in CEQA.

- **Automobile Club of Southern California**, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St.) Los Angeles. The property was determined eligible for listing in the National Register on February 7, 1992 (FHWA). It is also a locally designated Historic-Cultural Monument (#72, February 3, 1971). It is listed in the California Register
- **St. Vincent de Paul Church**, 601 West Adams Blvd., Los Angeles. The property was determined eligible for listing in the National Register on June 21, 1982 (FHWA). It is also a locally designated Historic Monument (#90, July 2, 1971). It is listed in the California Register
- **Thomas Stimson House**, 2421 South Figueroa St. Los Angeles. This property was listed in the National Register on March 30, 1978. It is also a locally designated Historic-Cultural Monument (#72, May 16, 1979). The property is listed in the California Register

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no adverse effects or impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

Construction impacts on cultural resources may include a temporary increase to noise levels during the construction period on surrounding historic properties, but would be minimized by implementing avoidance measures N-1, minimization measures N-2 through N-4, and GV-1. Potential traffic circulation issues during construction would be minimized with the implementation of minimization measure T-1. Potential increase in dirt, and dust from construction materials will be minimized by incorporating minimization measures WQ-1 through WQ-8, and minimization measures AQ-1 through AQ-16.

Potential Operational Impacts

The presence of the flyover has the potential to obscure historically significant views to and from St. John's Episcopal Church. The proposed structure may visually impair views of the church's main entrance/front steps to the southeast by the addition of ramp and columns to the east of the church.

The proposed Build Alternative may visually impair the view from the front (north) steps of St. John's Episcopal Church looking northeast across West Adams Blvd. The north end of the off-ramp at South Figueroa Street and Figueroa Way would not be visible from St. John's Episcopal Church. The proposed Build Alternative may visually impair St. John's Church Parish Hall as well, because it is historically linked to St. John's Church and the structure would modestly change its setting.

Based on this analysis, the proposed Build Alternative is expected to have an adverse effect on historically significant views to and from St. John's Episcopal Church and St. John's Parish Hall as a result of the introduction of new visual elements; thereby further diminishing both historic properties' integrity of setting from their periods of significance.

Caltrans finds that the undertaking may result in adverse effects on two of the five historic properties:

- **St. John's Episcopal Church**, 510-518 West Adams Blvd., Los Angeles
- **St. John's Church Parish Hall**, 515-517 West 27th St., Los Angeles

Caltrans finds that the undertaking may cause effects, but they would not be adverse, to three of the five historic properties:

- **Automobile Club of Southern California**, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St.), Los Angeles
- **St. Vincent de Paul Church**, 601 West Adams Blvd., Los Angeles
- **Thomas Stimson House**, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish Hall are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. Caltrans is consulting to resolve adverse effects pursuant to First Amended Section 106 PA, Stipulation XI, 36 CFR 800.6(a) and 800.6(b) (1).

The Finding of Adverse Effect (August 2015) served to obtain SHPO agreement that the undertaking may cause adverse effects to historic properties. Mitigation measures were explored in more detail during consultation with SHPO and consulting parties. With the implementation of avoidance, minimization and/or mitigation measures CR-1 through CR-5 the impacts will be less than significant. Caltrans prepared an MOA to address effects, which was completed on April 5, 2018. Therefore, the impact on the two historical resources will be less than significant.

No Section 4(f) resources will be impacted or used for the proposed project. See Appendix A for further discussion of Section 4(f) resources.

Avoidance, Minimization, and/or Mitigation Measures

Mitigation CR-1: Design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the West Adams community and is sensitive to the historic qualities of St. John's Episcopal Church.

Mitigation CR-2: Caltrans will create electronic content for a smartphone traveler application (The Clio or equal) that describes and interprets previously identified historic properties and historical resources nearby the flyover. Traveler application boundaries will be: the southern limit of Interstate 10 (on the north side), South Grand Avenue and I-110 (east), Martin Luther King, Jr. Boulevard (south) and South Normandie Avenue (west). Those historic properties and historical resources would include but not be limited to: St. John's Episcopal Church, St. John's Episcopal Church Parish House, the Automobile Club of Southern California (2601 South Figueroa Street, 650 West Adams Boulevard, 661 West 27th Street,), St. Vincent de Paul Church (601 West Adams Boulevard), the Stimson House (2421 South Figueroa Street), University Park Historic Preservation Overlay Zone and Chester Place Historic District (various). The content will include historical narrative information, as well as historical photographs, and other documentation. This application will be available free to the public through smartphone application stores prior to the termination of this agreement.

Mitigation CR-3: Caltrans will design and implement interior car cards to be placed in the DASH shuttle buses that service the project area. The car cards will, to the extent possible, direct riders' attention to historic properties, historical resources, local landmarks and historic neighborhoods in the above geographic area. If possible the car cards will direct riders to the Clio or equal smartphone application. The interior car cards will be posted for a minimum of six non-consecutive months. A proof and final photograph of the installed card/cards will be submitted to SHPO.

Avoidance CR-4: If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find. If human remains are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall stop in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to California Public Resources Code (PRC) Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC), which will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains will contact Kelly Ewing-Toledo, Senior Environmental Planner Cultural Resources Branch, so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

Minimization CR-5: Caltrans shall submit design development plans for the area beneath the flyover to SHPO for review and comment at 60% and 90% completion. SHPO will review the design development plans to determine whether the plans conform to concepts described in paragraph A of this stipulation. SHPO will provide comments on the submittals to Caltrans within 30 calendar days of receipt. If SHPO does not comment within the time provided, Caltrans may assume that SHPO concurs and that the package meets the cited objectives. Caltrans will incorporate SHPO comments into the project plans to the fullest extent. If Caltrans revises project

plans in response to SHPO comments, then no further review is required for that consultation package. Should Caltrans object to incorporation of SHPO comments into consultation packages at any stage of the project, Caltrans will provide SHPO with written explanation of that objection. Objections to the plans shall be resolved in accordance with Stipulation IV.B of the MOA.

Avoidance N-1: Equipment Noise Control will be applied to revising old equipment and designing new equipment to meet acceptable noise levels.

- Mufflers are very effective devices which reduce the noise emanating from the intake or exhaust of an engine, compressor, or pump. The fitting of effective mufflers on all new equipment and retrofitting of mufflers on existing equipment is necessary to yield an immediate noise reduction at all types of road construction sites
- Sealed and lubricated tracks for crawler mounted equipment will lessen the sound radiated from the track assembly resulting from metal to soil and metal to metal contact. Contractors, site engineers, and inspectors should ensure that the tracks are kept in excellent condition by periodic maintenance and lubrication
- Lowering exhaust pipe exit height closer to the ground can result in an off-site noise reduction. Barriers are more effective in attenuating noise when the noise source is closer to ground level
- General noise control technology can have substantially quieter construction equipment when manufacturers apply state-of-the-art technology to new equipment or repair old equipment to maintain original equipment noise levels

Minimization N-2: In-Use Noise Control where existing equipment is not permitted to produce noise levels in excess of specified limits.

Any equipment that produces noise levels less than the specified limits would not be affected. However, those exceeding the limit would be required to meet compliance by repair, retrofit, or replacement. New equipment with the latest noise sensitive components and noise control devices are generally quieter than older equipment, if properly maintained and inspected regularly. They should be repaired or replaced if necessary to maintain the in-use noise limit. All equipment applying the in use noise limit would achieve an immediate noise reduction if properly enforced.

Minimization N-3: Site Restrictions is an attempt to achieve noise reduction through modifying the time, place, or method of operation of a particular source. Site restrictions should be applied to achieve noise reduction through different methods, resulting in an immediate reduction of noise emitted to the
without requiring any modification to the source noise emissions. The methods include shielding with barriers for equipment and site, truck rerouting and traffic control, time scheduling, and equipment relocation. The effectiveness of each method depends on the type of construction involved and the site characteristics.

Shielding with barriers should be implemented at an early stage of a project to reduce construction equipment noise. The placement of barriers must be carefully considered to reduce limitation of site access. Barriers may be natural or man-made, such as excess land fill used as a temporary berm strategically placed to act as a barrier.

- Efficient rerouting of trucks and control of traffic activity on construction site will reduce noise due to vehicle idling, gear shifting and accelerating under load. Planning proper traffic control will result in efficient workflow and reduce noise levels. In addition, rerouting trucks does not reduce noise levels but transfers noise to other areas that are less sensitive to noise
- Time scheduling of activities should be implemented to minimize noise impact on exposed areas. Local activity patterns and surrounding land uses must be considered in establishing site curfews. However, limiting working hours can decrease productivity. Sequencing the use of equipment with relatively low noise levels versus with relatively high noise levels during noise sensitive periods is an effective noise control measure
- Equipment location should be as far from noise sensitive land use areas as possible. The contractor should substitute quieter equipment or use quieter construction processes at or near noise sensitive areas

Minimization N-4: Personnel training of operators and supervisors is needed to become more aware of the construction site noise problems.

Educating contractors and their employees to be sensitive to noise impact problems and noise control methods. This may be one of the most cost-effective ways to help operators and supervisors become more aware of the construction site noise problem and to implement the various methods of improving the conditions. A training program for equipment operators is recommended to instruct them in methods of operating their equipment to minimize environmental noise. Many training programs are presently given on the subject of job safety. This can be extended to include the impact due to noise and of abatement.

Minimization GV-1: As recommended in the Noise and Vibration Manual (September 2013), impact pile driving can be the most significant source of vibration at construction sites. The principal means of reducing vibration from impact pile driving are listed below. Some of these methods may not be appropriate in specific situations, but where they are practical; they can often be used to reduce vibration to an acceptable level.

- **Jetting:** Jetting is a pile driving aid in which a mixture of air and water is pumped through high-pressure nozzles to erode the soil adjacent to the pile to facilitate placement of the pile. Jetting can be used to bypass shallow, hard layers of soil that would generate high levels of vibration at or near the surface if an impact pile driver was used
- **Pre-drilling:** Pre-drilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving.
- **Using cast-in-place or auger cast piles:** Using cast-in-place or auger cast piles eliminates impact driving and limits vibration generation to the small amount generated by drilling, which is negligible

- **Using non-displacement piles:** Use of non-displacement piles such as H piles may reduce vibration from impact pile driving because this type of pile achieves its capacity from end bearing rather than from large friction transfer along the pile shaft
- **Using pile cushioning:** With pile cushioning, a resilient material is placed between the driving hammer and the pile to increase the period of time over which the energy from the driver is imparted to the pile. Keeping fresh, resilient cushions in the system can reduce the vibration generated by as much as a factor of 2 (Woods 1997)
- **Scheduling for specific times to minimize disturbance at nearby vibration-sensitive sites:** Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. For example, if pile driving near a residential area can be scheduled during business hours on weekdays, many people will be at work and will therefore not be affected
- **Using alternative nonimpact drivers:** Several types of proprietary pile driving systems have been designed specifically to reduce impact induced vibration by using torque and down-pressure or hydraulic static loading. These methods would be expected to significantly reduce adverse vibration effects from pile placement. The applicability of these methods depends in part on the type of soil

Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Minimization WQ-1: Storm drain inlet protection will be deployed throughout the project and the roadway should be swept regularly to minimize dirt and dust.

Minimization WQ-2: Concrete wastes will be managed through the use of concrete washout facilities.

Minimization WQ-3: Temporary silt fence shall be utilized to protect existing vegetation. Location of the temporary fencing shall be shown on the project plans.

Minimization WQ-4: Various waste management, materials handling, and other housekeeping BMPs will be used throughout the duration of the project.

Minimization WQ-5: Construction sequencing will be scheduled to minimize storm water quality impacts.

Minimization WQ-6: A Water Pollution Control Plan will be prepared, and implemented during the construction stage.

Minimization WQ-7: Comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) (i.e. Construction General Permit).

Minimization WQ-8: Comply with the provisions identified in the NPDES Statewide Storm Water Permit Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003).

Minimization AQ-1: Compliance with Caltrans' Standard Specifications in Section 14 (2010) will be required.

Minimization AQ-2: Section 14-9.01 specifically requires compliance with all applicable laws and regulations related to air quality, including SCAQMD rules and regulations and local ordinances.

Minimization AQ-3: 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.

Minimization AQ-4: 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 as required by the SCAQMD.

Minimization AQ-5: Spread soil binder on any unpaved roads used for construction purposes, and all project construction parking areas.

Minimization AQ-6: Wash off trucks as they leave the R/W as necessary to control fugitive dust emissions.

Minimization AQ-7: 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.

Minimization AQ-8: Develop a dust control plan documenting sprinkling, temporary paving, speed limits, and expedited re-vegetation of disturbed slopes as needed to minimize construction impacts to existing communities.

Minimization AQ-9: Locate equipment and materials storage sites at least 500 feet from the sensitive receptors. Keep construction areas clean and orderly.

Minimization AQ-10: Establish environmentally sensitive areas (ESAs) or their equivalent at least 500 feet away from sensitive air receptors within which construction activities such as extended idling, material storage, and equipment maintenance, would be prohibited, to the extent feasible.

Minimization AQ-11: 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.

Minimization AQ-12: 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.

Minimization AQ-13: Promptly and regularly remove dust and mud that are deposited on paved, public roads due to construction activity and traffic to decrease particulate matter.

Avoidance AQ-14: 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.

Minimization AQ-15: Install mulch or plant vegetation as soon as practical after grading to reduce windblown particulates 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.

Avoidance AQ-16: While unlikely, if naturally occurring asbestos, serpentine, or ultramafic rock is discovered during grading operations Section 93105, Title 17 of the California Code of Regulations requires notification to the SCAQMD by the next business day and implementation of the following measures within 24 hours:

- Unpaved areas subject to vehicle traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos
- The speed of any vehicles and equipment traveling across unpaved areas must be no more than fifteen (15) miles per hour unless the road surface and surrounding area is sufficiently stabilized to prevent vehicles and equipment traveling more than 15 miles per hour from emitting dust that is visible crossing the project boundaries
- Storage piles and disturbed areas not subject to vehicular traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos
- Activities must be conducted so that no track-out from any road construction project is visible on any paved roadway open to the public

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2.2 Physical Environment

2.2.1 Water Quality and Storm Water Runoff

Regulatory Setting

Federal Requirements

Clean Water Act

In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the waters of the United States (U.S.) from any point source[3] unlawful unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. This act and its amendments are known today as the Clean Water Act (CWA). Congress has amended the act several times. In the 1987 amendments, Congress directed dischargers of storm water from municipal and industrial/construction point sources to comply with the NPDES permit scheme. The following are important CWA sections:

- Sections 303 and 304 require states to issue water quality standards, criteria, and guidelines
- Section 401 requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the U.S. to obtain certification from the state that the discharge will comply with other provisions of the act. This is most frequently required in tandem with a Section 404 permit request (see below)
- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the U.S. Regional Water Quality Control Boards (RWQCB) administer this permitting program in California. Section 402(p) requires permits for discharges of storm water from industrial/construction and municipal separate storm sewer systems (MS4s)
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the U.S. Army Corps of Engineers (USACE)

The goal of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."

The USACE issues two types of 404 permits: General and Standard permits. There are two types of General permits: Regional permits and nationwide permits. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Ordinarily, projects that do not meet the criteria for a Nationwide Permit may be permitted under one of the USACE's Standard permits. There are two types of Standard permits: Individual permits and Letters of Permission. For Standard permits, the USACE decision to approve is based on compliance with U.S. Environmental Protection Agency's Section 404 (b) (1) Guidelines (U.S. EPA

[3] A point source is any discrete conveyance such as a pipe or a man-made ditch.

Code of Federal Regulations [CFR] 40 Part 230), and whether the permit approval is in the public interest. The Section 404(b) (1) Guidelines (Guidelines) were developed by the U.S. EPA in conjunction with the USACE, and allow the discharge of dredged or fill material into the aquatic system (waters of the U.S.) only if there is no practicable alternative which would have less adverse effects. The Guidelines state that the USACE may not issue a permit if there is a least environmentally damaging practicable alternative (LEDPA) to the proposed discharge that would have lesser effects on waters of the U.S. and not have any other significant adverse environmental consequences. According to the Guidelines, documentation is needed that a sequence of avoidance, minimization, and compensation measures has been followed, in that order. The Guidelines also restrict permitting activities that violate water quality or toxic effluent[4] standards, jeopardize the continued existence of listed species, violate marine sanctuary protections, or cause "significant degradation" to waters of the U.S. In addition, every permit from the USACE, even if not subject to the Section 404(b) (1) Guidelines, must meet general requirements. See 33 CFR 320.4. A discussion of the LEDPA determination, if any, for the document is included in the Wetlands and Other Waters section.

State Requirements

Porter-Cologne Water Quality Control Act

California's Porter-Cologne Act, enacted in 1969, provides the legal basis for water quality regulation within California. This act requires a "Report of Waste Discharge" for any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state. It predates the CWA and regulates discharges to waters of the state. Waters of the state include more than just waters of the U.S., like groundwater and surface waters not considered waters of the U.S. Additionally, it prohibits discharges of "waste" as defined, and this definition is broader than the CWA definition of "pollutant." Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements (WDRs) and may be required even when the discharge is already permitted or exempt under the CWA.

The State Water Resources Control Board (SWRCB) and RWQCBs are responsible for establishing the water quality standards (objectives and beneficial uses) required by the CWA and regulating discharges to ensure compliance with the water quality standards. Details about water quality standards in a project area are included in the applicable RWQCB Basin Plan. In California, Regional Boards designate beneficial uses for all water body segments in their jurisdictions and then set criteria necessary to protect these uses. As a result, the water quality standards developed for particular water segments are based on the designated use and vary depending on that use. In addition, the SWRCB identifies waters failing to meet standards for specific pollutants. These waters are then state-listed in accordance with CWA Section 303(d). If a state determines that waters are impaired for one or more constituents and the standards cannot be met through point source or non-point source controls (NPDES permits or WDRs), the CWA requires the establishment of Total Maximum Daily Loads (TMDLs). TMDLs specify allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed

[4] The U.S. EPA defines "effluent" as "wastewater, treated or untreated, that flows out of a treatment plant, sewer, or industrial outfall."

State Water Resources Control Board and Regional Water Quality Control Boards

The SWRCB administers water rights, sets water pollution control policy, and issues water board orders on matters of statewide application, and oversees water quality functions throughout the state by approving Basin Plans, TMDLs, and NPDES permits. RWCQBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

National Pollutant Discharge Elimination System (NPDES) Program

Municipal Separate Storm Sewer Systems (MS4) Section 402(p) of the CWA requires the issuance of NPDES permits for five categories of storm water discharges, including Municipal Separate Storm Sewer Systems (MS4s). An MS4 is defined as "any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over storm water, that is designed or used for collecting or conveying storm water." The SWRCB has identified the Department as an owner/operator of an MS4 under federal regulations. The Department's MS4 permit covers all Department rights-of-way, properties, facilities, and activities in the state. The SWRCB or the RWQCB issues NPDES permits for five years, and permit requirements remain active until a new permit has been adopted.

The Department's MS4 Permit (Order No. 2012-0011-DWQ) was adopted on September 19, 2012 and became effective on July 1, 2013. The permit has three basic requirements:

1. The Department must comply with the requirements of the Construction General Permit (see below)
2. The Department must implement a year-round program in all parts of the State to effectively control storm water and non-storm water discharges
3. The Department storm water discharges must meet water quality standards through implementation of permanent and temporary (construction) Best Management Practices (BMPs), to the Maximum Extent Practicable, and other measures as the SWRCB determines to be necessary to meet the water quality standards

To comply with the permit, the Department developed the Statewide Storm Water Management Plan (SWMP) to address storm water pollution controls related to highway planning, design, construction, and maintenance activities throughout California. The SWMP assigns responsibilities within the Department for implementing storm water management procedures and practices as well as training, public education and participation, monitoring and research, program evaluation, and reporting activities. The SWMP describes the minimum procedures and practices the Department uses to reduce pollutants in storm water and non-storm water discharges. It outlines procedures and responsibilities for protecting water quality, including the selection and implementation of Best Management Practices (BMPs). The proposed project will be programmed to follow the guidelines and procedures outlined in the latest SWMP to address storm water runoff.

Construction General Permit

Construction General Permit (Order No. 2009-009-DWQ), adopted on September 2, 2009, became effective on July 1, 2010. The permit regulates storm water discharges from construction sites that result in a Disturbed Soil Area (DSA) of one acre or greater, and/or are smaller sites that are part of a larger common plan of development. By law, all storm water discharges associated with construction activity where clearing, grading, and excavation result in soil disturbance of at least one acre must comply with the provisions of the General Construction Permit. Construction activity that results in soil disturbances of less than one acre is subject to this Construction General Permit if there is potential for significant water quality impairment resulting from the activity as determined by the RWQCB. Operators of regulated construction sites are required to develop storm water pollution prevention plans; to implement sediment, erosion, and pollution prevention control measures; and to obtain coverage under the Construction General Permit.

The 2009 Construction General Permit separates projects into Risk Levels 1, 2, or 3. Risk levels are determined during the planning and design phases, and are based on potential erosion and transport to receiving waters. Requirements apply according to the Risk Level determined. For example, a Risk Level 3 (highest risk) project would require compulsory storm water runoff pH and turbidity monitoring, and before construction and after construction aquatic biological assessments during specified seasonal windows. For all projects subject to the permit, applicants are required to develop and implement an effective Storm Water Pollution Prevention Plan (SWPPP). In accordance with the Department's Standard Specifications, a Water Pollution Control Plan (WPCP) is necessary for projects with DSA less than one acre.

Section 401 Permitting

Under Section 401 of the CWA, any project requiring a federal license or permit that may result in a discharge to a water of the United States must obtain a 401 Certification, which certifies that the project will be in compliance with state water quality standards. The most common federal permits triggering 401 Certification are CWA Section 404 permits issued by the USACE. The 401 permit certifications are obtained from the appropriate RWQCB, dependent on the project location, and are required before the USACE issues a 404 permit.

In some cases, the RWQCB may have specific concerns with discharges associated with a project. As a result, the RWQCB may issue a set of requirements known as Waste Discharge Requirements (WDRs) under the State Water Code (Porter-Cologne Act) that define activities, such as the inclusion of specific features, effluent limitations, monitoring, and plan submittals that are to be implemented for protecting or benefiting water quality. WDRs can be issued to address both permanent and temporary discharges of a project.

Affected Environment

The Los Angeles (LA) River watershed is one of the largest in the Region. Approximately 324 square miles of the watershed are covered by forest or open space land including the area near the headwaters which originate in the Santa Monica, Santa Susana, and San Gabriel Mountains. The rest of the watershed is highly developed. The river flows through the San Fernando Valley past heavily developed residential and commercial areas. From the Arroyo Seco, north of downtown Los Angeles, to the confluence with the Rio Hondo, the river flows through industrial and commercial areas and is bordered by rail yards, freeways, and major commercial and government buildings. From the Rio Hondo to the Pacific Ocean, the river flows through industrial, residential, and commercial areas, including major refineries and petroleum products storage facilities, major freeways, rail lines, and rail yards serving the Ports of Los Angeles and Long Beach.

Ballona Creek is an 8.8-mile-long waterway in southwestern Los Angeles County whose watershed drains the Los Angeles basin, from the Santa Monica Mountains on the north, the Harbor Freeway (I-110) on the east, and the Baldwin Hills on the south. It heads in the historical Rancho Las Cienegas and flows through Culver City and the Del Rey district before emptying into Santa Monica Bay between Marina del Rey and the Playa del Rey district.

According to the Storm Water Data Report (July 2015), the Los Angeles Regional Water Quality Control Board Region 4 (LARWQCB) has jurisdiction within the project limits. The nearest water bodies are the Ballona Creek and the Los Angeles River Reach 2 (Carson to Figueroa St.).

The following are pollutants of concern in both water bodies: coliform bacteria, oil, ammonia, cooper, lead, nutrients (algae), trash cadmium (sediment), cyanide, toxicity, viruses (enteric) selenium, copper (dissolved), and zinc. The project limits are within the Ballona Creek Watershed and the hydrologic area is interior Santa Monica Bay, Hydrologic Sub Area is Wilshire.

Disturbed soil areas (DSAs) are areas of exposed, erodible soil that are within the construction limits and that result from construction activities. The DSA from construction of the proposed project is 0.47 acre, and the net gain impervious surface after construction would be 0.07 acre. The total affected area (DSA) is calculated based on total disturbances (paved or unpaved areas), which include:

- Retaining walls and touchdown areas
- Roadway work at paved areas
- Roadway work at unpaved areas
- All columns (bents) excavation areas

Environmental Consequences

Alternative 1 (No Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

The greatest water pollution threat from soil-disturbing activities is the introduction of sediment from the construction site into storm drain systems or natural receiving waters. Soil-disturbing activities such as: clearing, grubbing, and earthwork increase the exposure of soils to wind, rain, and concentrated flows that cause erosion. Below are minimization measures WQ-1 through WQ-8 to minimize impacts to water quality.

Since DSA for this project is less than 1 acre, a Storm Water Pollution Plan is not required; therefore this project is expected to utilize a Water Pollution Control Program (WPCP). Also due to the small DSA, and the nature of this project and type of construction sediment control and erosion control Best Management Practices (BMPs) are anticipated to be necessary. Therefore, waste management BMPs will be utilized.

Potential Operational Impacts

No operational impacts are anticipated as a result of the proposed Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

Minimization WQ-1: Storm drain inlet protection will be deployed throughout the project and the roadway should be swept regularly to minimize dirt and dust.

Minimization WQ-2: Concrete wastes will be managed through the use of concrete washout facilities.

Minimization WQ-3: Temporary silt fence shall be utilized to protect existing vegetation. Location of the temporary fencing shall be shown on the project plans.

Minimization WQ-4: Various waste management, materials handling, and other housekeeping BMPs will be used throughout the duration of the project.

Minimization WQ-5: Construction sequencing will be scheduled to minimize storm water quality impacts.

Minimization WQ-6: A Water Pollution Control Plan will be prepared, and implemented during the construction stage.

Minimization WQ-7: Comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) (i.e. Construction General Permit).

Minimization WQ-8: Comply with the provisions identified in the NPDES Statewide Storm Water Permit Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003).

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2.2.2 Geology, Soils, Seismicity and Topography

Regulatory Setting

For geologic and topographic features, the key federal law is the Historic Sites Act of 1935, which establishes a national registry of natural landmarks and protects "outstanding examples of major geological features." Topographic and geologic features are also protected under the California Environmental Quality Act (CEQA).

This section also discusses geology, soils, and seismic concerns as they relate to public safety and project design. Earthquakes are prime considerations in the design and retrofit of structures. The Department's Office of Earthquake Engineering is responsible for assessing the seismic hazard for Department projects. Structures are designed using the Department's Seismic Design Criteria (SDC). The SDC provides the minimum seismic requirements for highway bridges designed in California. A bridge's category and classification will determine its seismic performance level and which methods are used for estimating the seismic demands and structural capabilities.

Affected Environment

The Geotechnical Memo (April 2010) summarizes the geotechnical elements that may interact with the Harbor Transitway and the construction of the proposed Build Alternative. The following section discusses the geotechnical elements.

Site Geology

The area within the project limits have been mapped as surficial sediments (Qa) consisting mainly of alluvial gravel, sand and clay deposits with some cobbles (Dibblee, T.W., 1991). Based on some of the boring logs reviewed, the inter-bedded sand and gravel layers generally range from dense to very dense.

Seismicity

The project is located in a seismically active area. The geologic processes which have caused earthquakes in the past can be expected to continue. Seismic events which are likely to produce the greatest bedrock accelerations could be a moderate event on the Puente Hills Blind Thrust Fault and/or a large event on a distant earthquake fault. An earthquake fault is considered by the State of California to be active if geologic evidence indicates that movement on the fault has occurred in the last 11,000 years, and potentially active if movement is demonstrated to have occurred in the last 2 million years.

Seismic Phenomena (Ground Shaking)

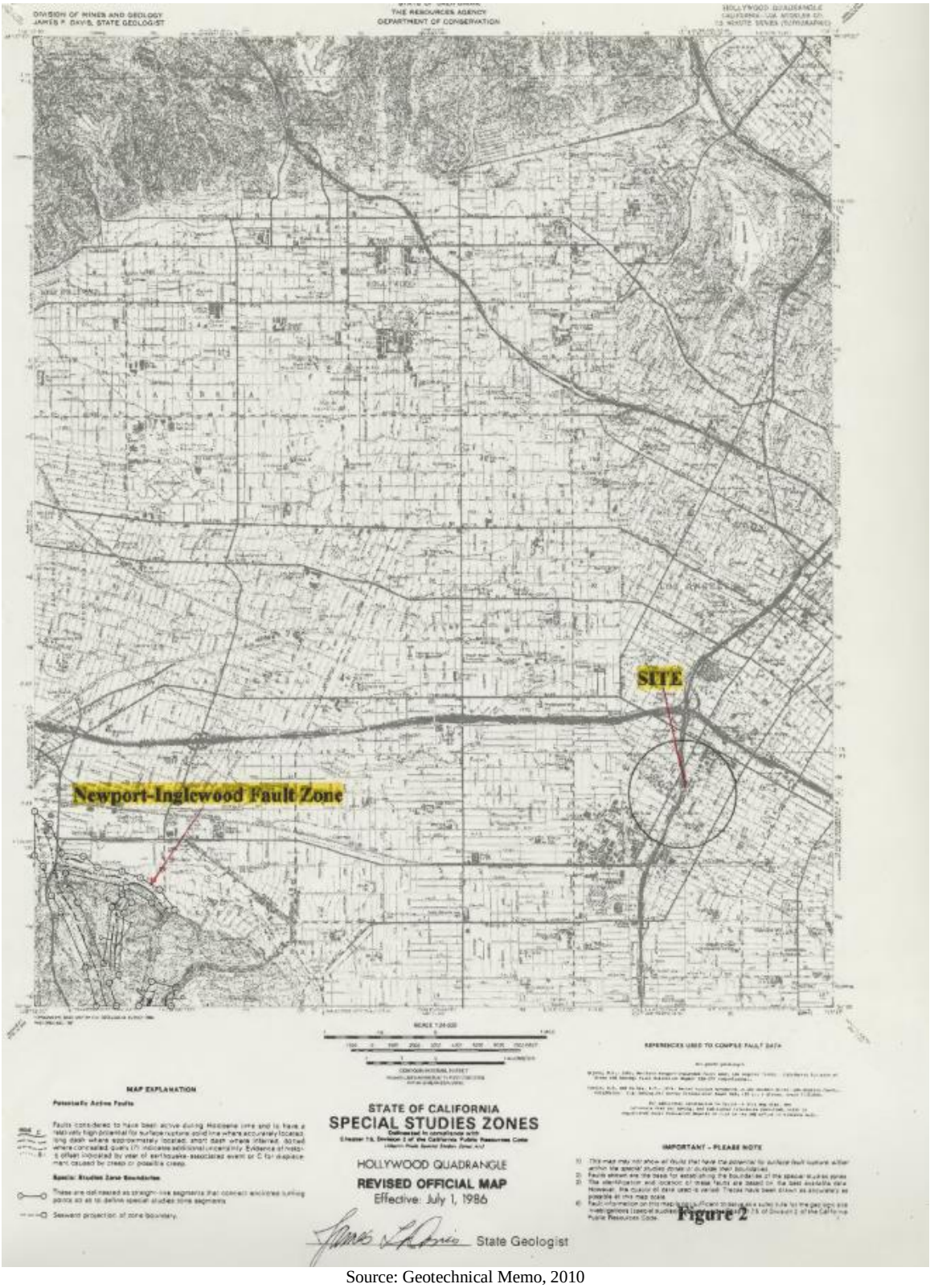
Ground shaking is the primary cause of structural damage during an earthquake; the magnitude, duration and vibration frequency characteristics will vary greatly, depending upon the particular causative fault and its distance from the project.

Using Caltrans ARS Online (V2.3.06), the Puente Hills Blind Thrust System is the closest to the site with a Maximum Magnitude (Mmax) of 6.9. Deterministic site parameters obtained using the EQFAULT-Version 3.0 (T. Blake, 2004) computer program for the deterministic prediction of peak acceleration from digitized California Fault System indicates that the Maximum Earthquake Magnitude (Mw) expected at the site could be 7.1.

Ground Rupture

An analysis of fault rupture hazard for a particular fault requires that the fault be located exactly, and it's potential for rupture to be known, if only approximately. There are no known earthquake faults crossing the project. The closest earthquake fault zone under the auspices of the Alquist-Priolo Earthquake Fault Zoning Act is the Newport-Inglewood Fault Zone and is located 4.5 miles SW of the project. Please refer to Figure 42 for geologic seismic hazard fault map.

Figure 42: Geologic Seismic Hazard Fault Map



Source: Geotechnical Memo, 2010

Liquefaction

Liquefaction occurs when vibrations or water pressure within a mass of soil cause the soil particles to lose contact with one another. As a result, the soil behaves like a liquid, has an inability to support weight and can flow down very gentle slopes. This condition is usually temporary and is most often caused by an earthquake vibrating water-saturated fill or unconsolidated soil.

Liquefaction most often occurs when three conditions are met:

1) Loose, granular sediment or fill
2) Saturation by groundwater
3) Strong shaking

Further, liquefaction exists when fine silts and sands are located below the water table. The water can also be perched ground water. Liquefaction has been documented to affect soils to approximately 15 m. (50 feet) deep, during prolonged periods of ground shaking.

Groundwater

Groundwater was not encountered to a depth of approximately 70 feet below ground surface during the 1954 and 1990 boring explorations for the existing overcrossing structure.

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

The following information is based only on preliminary estimates derived from studying similar structures and using engineering judgment. The actual lengths of piles will be determined more precisely during the design stage. Depending on the location of the bents (columns) the depth of the piles differs from about 50 feet to 120 feet in depth. For the depth of the wing walls (touch-down location close to Figueroa St. retaining walls) it will be approximately 8 feet in depth, and for road/sidewalks it will be approximately 2 feet in depth.

It was found that the potential for ground rupture in non-existing to very low at the site. In addition, based on a regional study conducted by the U.S. Geological Survey (1985), the relative liquefaction susceptibility along these project limits is considered to be low to very low. A 1999 Seismic Hazard Map - Hollywood Quadrangle issued by the Department of Conservation California Geological Survey shows that there is not a potential for liquefaction within the project limits. The Geotechnical Unit concurs with these findings.

Groundwater may be impacted by the construction of this project. More information on potential groundwater impacts will be determined during the PS&E phase. Groundwater may be impacted depending on the depth of the bents, but with the incorporation in GT-1 impacts will be minimized. Some construction activities could expose soils to temporary erosion; however, this temporary erosion could be reduced by implementing National Pollutant Discharge Elimination System Permit (NPDES) and BMPs during project construction. There will be no change in the existing rate of erosion as a result of the project. There are no known natural resources that will be affected by the project.

Potential Operational Impacts

No operational impacts are anticipated at this time, but more information will be available at the PS&E Stage of this project.

Avoidance, Minimization, and/or Mitigation Measures

Minimization GT-1: If the Build Alternative is selected, a site-specific geotechnical investigation shall be conducted prior to the detailed design phase. This investigation will determine the depth of the existing groundwater and provide recommendations for avoidance, minimization, and/or mitigation measures, if any, as appropriate.

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2.2.3 Paleontology

Regulatory Setting

Paleontology is a natural science focused on the study of ancient animal and plant life as it is preserved in the geologic record as fossils. A number of federal statutes specifically address paleontological resources, their treatment, and funding for mitigation as a part of federally authorized projects. 23 United States Code (USC) 1.9(a) requires that the use of federal-aid funds must be in conformity with federal and state law.23 United States Code (USC) 305 authorizes the appropriation and use of federal highway funds for paleontological salvage as necessary by the highway department of any state, in compliance with 16 USC 431-433 above and state law. Under California law, paleontological resources are protected by the California Environmental Quality Act (CEQA).

Affected Environment

As mentioned earlier, the lay of the land within the corridor or project corridor is primarily flat and urban. The area is highly urbanized, it is primarily a commercial area, but surrounded by some residential areas. According to the City's General Plan, the area is comprised of commercial, industrial, open space, and residential multiple family land use designations. Various types of building structures surround the project area, gas stations, strip malls, historical buildings, churches, and office buildings, which all make-up the man-made visual resources. Single family residential units are sparse in the immediate area adjacent to the project location. The nearest single family residential area is approximately a quarter mile to the west.

The area within the project limits have been mapped as surficial sediments (Qa) consisting mainly of alluvial gravel, sand and clay deposits with some cobbles (Dibblee, T.W., 1991). Based on some of the boring logs reviewed, the inter-bedded sand and gravel layers generally range from dense to very dense. According to the Paleontological Resources Evaluation Memo (November 2014), no paleontological resources are within the project study area.

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

No impacts to paleontological resources are anticipated as a result of the proposed Build Alternative, but avoidance measure PALEO-1 will be in place should paleontological resources be discovered during construction.

Potential Operational Impacts

Operational impacts are not anticipated as a result of the proposed Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

Avoidance PALEO-1: If during construction paleontological resources are discovered, a qualified paleontologist will need to recover them. Construction work will be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains will be collected, evaluated and deposited in a scientific institution such as the Los Angeles Natural History Museum as a donation.

2.2.4 Hazardous Waste and Materials

Regulatory Setting

Hazardous materials, including hazardous substances and wastes, are regulated by many state and federal laws. Statutes govern the generation, treatment, storage and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health and land use.

The primary federal laws regulating hazardous wastes/materials are the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and the Resource Conservation and Recovery Act of 1976 (RCRA). The purpose of CERCLA, often referred to as "Superfund," is to identify and clean up abandoned contaminated sites so that public health and welfare are not compromised. The RCRA provides for "cradle to grave" regulation of hazardous waste generated by operating entities. Other federal laws include:

-Community Environmental Response Facilitation Act (CERFA) of 1992

-Clean Water Act

-Clean Air Act

-Safe Drinking Water Act

-Occupational Safety and Health Act (OSHA)

-Atomic Energy Act

-Toxic Substances Control Act (TSCA)

-Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, Executive Order (EO) 12088, Federal Compliance with Pollution Control Standards, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

California regulates hazardous materials, waste, and substances under the authority of the CA Health and Safety Code and is also authorized by the federal government to implement RCRA in the state. California law also addresses specific handling, storage, transportation, disposal, treatment, reduction, cleanup and emergency planning of hazardous waste. The Porter-Cologne Water Quality Control Act also restricts disposal of wastes and requires clean-up of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and clean up contamination include Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, Title 23 Waters, and Title 27 Environmental Protection.

Worker and public health and safety are key issues when addressing hazardous materials that may affect human health and the environment. Proper management and disposal of hazardous material is vital if it is found, disturbed, or generated during project construction.

Affected Environment

The Los Angeles Regional Water Quality Control Board's GEOTRACKER and California Department of Toxic Substances Control (DTSC) ENVIROSTOR environmental database were reviewed to identify potential Recognized Environmental Concerns (RECs) with respect to potential soil and groundwater conditions pertaining to the structure improvement/construction. Based on the environmental databases researched, one reported Leaking Underground Storage Tank (LUST) site, Mobile #18-BV7 (T0603171) located at 2620 Figueroa St. had open site assessment since June of 2000. This facility reported groundwater contamination with gasoline. The Responsible Party (RP) stated their investigation and quarterly monitoring program since January 2003 and subsequently received a Closure/ No Further Action (NFA) letter issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) on 9/16/2006.

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

It is likely that deep foundations will be employed for the new off-ramp structure. A Phase II environment site investigation will be performed in the Plans Specifications and Estimates Phase of the project (as stated in minimization measure HW-6) to characterize both soil and groundwater conditions and to establish a base-line condition for wastewater discharging compliance. Further, a project specific Lead Compliance Plan will be developed as stated in HW-2, which will minimize potential impacts.

Aerially deposited lead (ADL) from the historical use of leaded gasoline, exists along roadways throughout California. There is the likely presence of soils with elevated concentrations of lead as a result of ADL on the state highway system right of way within the limits of the project alternatives. Soil determined to contain lead concentrations exceeding stipulated thresholds must be managed under the July 1, 2016, ADL Agreement between Caltrans and the California Department of Toxic Substances Control. This ADL Agreement allows such soils to be safely reused within the project limits as long as all requirements of the ADL Agreement are met.

The proposed improvements consist of roadway and structure excavations at existing unpaved areas. Aerially Deposited Lead (ADL) soil may potentially exist at unpaved areas where it has been undisturbed in the past. Asbestos Containing Material (ACM) may be present in older bridge railing, utility conduits, drainage pipes, and shim plates. Avoidance measure HW-7 and HW-1 will minimize impacts.

According to Caltrans Headquarters (HQ) Lead Testing Guidance (June 2007), removal and installation of Metal Beam Guard Railing (MBGRs/MGRs), roadside signs (with wooden post), minor grading, curb & dike reconstruction, landscape & irrigation works are considered minor soil disturbance work. These tasks, where the soil will not be removed from the area of disturbance and waste will not be generated as defined in Title 26 of the California Code of Regulations (26CCR), the DTSC Aerially Deposited Lead (ADL) Variance will not be invoked. Treated Wood Waste (TWW) can occur as existing wooden posts for MBGRs and roadside signs are removed. These wood products are typically treated with preserving chemicals that protect against insect attack and fungal decay. These chemicals may be hazardous (carcinogenic). Avoidance measure HW-7, minimization measure HW-3, HW-4 will minimize potential impacts. The existing yellow thermoplastic traffic stripe and pavement marking will be disturbed/removed as part of the project improvements. Yellow thermoplastic traffic stripe and pavement marking contain elevated lead and chromium, which is regulated as California Hazardous Waste. Potential impacts will be minimized with the incorporation of HW-5.

According to Caltrans Right of Way Division and Caltrans Design, approximately 3 feet will be needed from two parcels to ensure sufficient space for maintenance, ingress/egress, access control, and setback purposes as well as emergency services access. The two parcels are businesses in a strip mall near the proposed project. Businesses will not be impacted by the acquisition of approximately a 3 foot sliver from the back of the properties. Therefore, the following parcels will be acquired for the proposed Build Alternative:

- Parcel # 80596-1 (APN #5124-027-015)
- Parcel # 80597-1 (APN #5124-027-017)

No relocations are anticipated as a result of the proposed Build Alternative. With the incorporation of minimization measure HW-6, potential impacts will be minimized.

Potential Operational Impacts

No operational impacts are anticipated as a result of the proposed Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

Minimization HW-1: An Asbestos Containing Material (ACM) Survey will be performed by a certified Asbestos Consultant (CAC) and Certified Lead Inspector (CLI). This allow the contractor to apply for a National Emission Standards for Hazardous Air Pollutants (NESHAP) notification/permit with South Coast Air Quality Management (SCAQMD) prior to bridge demolition work.

Minimization HW-2: The development of a project-specific Lead Compliance Plan (LCP) and training program to ensure proper health and safety measures are implemented and complied prior to start of the removal operation will be required. Per Caltrans Standard Special Provisions (SSPs) a project-specific Lead Compliance Plan will be required prior to the minor soil disturbance, major soil disturbance (requires LCP and Excavation and Transportation Plan (ETP), removal of existing Yellow/White Thermoplastic Traffic Stripe and pavement marking (requires LCP and Debris Removal, Containment, and Disposal Work Plan), and non-aerially deposited lead soil disturbance (requires a Health and Safety Plan (HaSP) and a Hazardous Material/Waste Management Plan (HMP) at the project site.

Minimization HW-3: A TWW disposal health and safety plan will be prepared.

Minimization HW-4: A Debris Containment and Disposal Work Plan will be prepared.

Minimization HW-5: Removal of yellow/white thermoplastic traffic stripes and pavement marking material shall be properly collected, stored, transported, and disposed of in accordance with State and Federal guidelines.

Minimization HW-6: If the proposed Build Alternative is selected, then a Phase I Environmental Site Assessment (ESA) and a Phase II Site Investigation (SI) will be prepared. The Phase II Site Investigation will be performed on existing corridor and new parcels to be acquired for the project. The purpose of the ESA is to recognize environmental conditions in connection with the parcels. The Phase II Site Investigation will evaluate and determine the extent/degree of contaminations on the Parcels prior to acquisition. The objective of the Site Investigation is to characterize/evaluate both soil and groundwater condition.

Avoidance HW-7: A comprehensive ADL site investigation will be performed in the Plans Specifications and Estimates phase of the project in order to evaluate the extent of ADL contamination and to assist in evaluation of applicable ADL soil management during construction.

2.2.5 Air Quality

Regulatory Setting

The Federal Clean Air Act (FCAA), as amended, is the primary federal law that governs air quality while the California Clean Air Act is its companion state law. These laws, and related regulations by the United States Environmental Protection Agency (U.S. EPA) and California Air Resources Board (ARB), set standards for the concentration of pollutants in the air. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). NAAQS and state ambient air quality standards have been established for six transportation-related criteria pollutants that have been linked to potential health concerns: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), which is broken down for regulatory purposes into particles of 10 micrometers or smaller (PM_{10}) and particles of 2.5 micrometers and smaller ($PM_{2.5}$), and sulfur dioxide (SO_2). In addition, national and state standards exist for lead (PB) and state standards exist for visibility reducing particles, sulfates, hydrogen sulfide (H_2S), and vinyl chloride. The NAAQS and state standards are set at levels that protect public health with a margin of safety, and are subject to periodic review and revision. Both state and federal regulatory schemes also cover toxic air contaminants (air toxics); some criteria pollutants are also air toxics or may include certain air toxics in their general definition.

Federal air quality standards and regulations provide the basic scheme for project-level air quality analysis under the National Environmental Policy Act (NEPA). In addition to this environmental analysis, a parallel "Conformity" requirement under the FCAA also applies.

Conformity

The conformity requirement is based on Federal Clean Air Act Section 176(c), which prohibits the U.S. Department of Transportation (USDOT) and other federal agencies from funding, authorizing, or approving plans, programs or projects that do not conform to State Implementation Plan (SIP) for attainting the NAAQS. "Transportation Conformity" applies to highway and transit projects and takes place on two levels: the regional—or, planning and programming—level and the project level. The proposed project must conform at both levels to be approved.

Conformity requirements apply only in nonattainment and "maintenance" (former nonattainment) areas for the NAAQS, and only for the specific NAAQS that are or were violated. U.S. EPA regulations at 40 Code of Federal Regulations (CFR) 93 govern the conformity process. Conformity requirements do not apply in unclassifiable/attainment areas for NAAQS and do not apply at all for state standards regardless of the status of the area.

Regional conformity is concerned with how well the regional transportation system supports plans for attaining the NAAQS for carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM_{10} and $PM_{2.5}$), and in some areas (although not in California) sulfur dioxide (SO_2). California has attainment or maintenance areas for all of these transportation-related "criteria pollutants" except SO_2, and also has a nonattainment area for lead (Pb); however, lead is not currently required by the FCAA to be covered in transportation conformity analysis. Regional conformity is based on emission analysis of Regional Transportation Plans (RTPs) and Federal Transportation Improvement Programs (FTIPs) that include all transportation projects planned for a region over a period of at least 20 years for the RTP) and 4 years (for the TIP). RTP and FTIP

conformity uses travel demand and emission models to determine whether or not the implementation of those projects would conform to emission budgets or other tests at various analysis years showing that requirements of the Clean Air Act and the SIP are met. If the conformity analysis is successful, the Metropolitan Planning Organization (MPO), Federal Highway Administration (FHWA), and Federal Transit Administration (FTA), make determinations that the RTP and FTIP are in conformity with the SIP for achieving the goals of the FCAA. Otherwise, the projects in the RTP and/or FTIP must be modified until conformity is attained. If the design concept, scope, and "open-to-traffic" schedule of a proposed transportation project are the same as described in the RTP and FTIP, then the proposed project meets regional conformity requirements for purposes of project-level analysis.

Conformity analysis at the project-level includes verification that the project is included in the regional conformity analysis and a "hot-spot" analysis if an area is "nonattainment" or "maintenance" for carbon monoxide (CO) and/or particulate matter (PM_{10} or $PM_{2.5}$). A region is "nonattainment" if one or more of the monitoring stations in the region measures a violation of the relevant standard and the U.S. EPA officially designates the area nonattainment.

Areas that were previously designated as nonattainment areas but subsequently meet the standard may be officially re-designated to attainment by U.S. EPA and are then called "maintenance" areas. "Hot-spot" analysis is essentially the same, for technical purposes, as CO or particulate matter analysis performed for NEPA purposes. Conformity does include some specific procedural and documentation standards for projects that require a hot-spot analysis. In general, projects must not cause the "hot-spot" related standard to be violated, and must not cause any increase in the number and severity of violations in nonattainment areas. If a known CO or particulate matter violation is located in the project vicinity, the project must include measures to reduce or eliminate the existing violation(s) as well.

Affected Environment

According to the Air Quality Analysis (September 2015)**,** the average wind speed for Los Angeles is the lowest of the nation's ten largest urban areas. In addition, the summertime daily maximum mixing heights (an index of how well pollutants can be dispersed vertically in the atmosphere) in Southern California is the lowest, on average, in the U.S., due to strong temperature inversions in the lower atmosphere that effectively trap pollutants near the surface. The Southern California area is also an area with abundant sunshine, which drives the photochemical reactions which form pollutants such as ozone and a significant portion of fine Particulate Matter ($PM_{2.5}$).

In the Basin, high concentrations of ozone are normally recorded during the late spring and summer months, when more intense sunlight drives enhanced photochemical reactions. In contrast, higher concentrations of carbon monoxide are generally recorded in late fall and winter, when nighttime radiation inversions trap the emissions at the surface. High Inhalable Particulate Matter (PM_{10}) and ($PM_{2.5}$) concentrations can occur throughout the year, but occur most frequently in fall and winter in the Basin.

Although there are changes in emissions by season, the observed variations in pollutant concentrations are largely a result of seasonal differences in weather conditions. The climatological station closest to the site that monitors temperature is the Los Angeles Civic Center monitoring station, which maintained by the Western Regional Climate Center. The annual average maximum temperature recorded from 4/1/1906 to 3/31/2013 at this station is 23.3 C (74F), and the annual average minimum is 13.2C (55.8F). December and January are typically the coldest months in this area of the Basin. Almost all rainfall in Los Angeles County falls during the winter/early spring (November through April). Summer rainfall is normally restricted to scattered thundershowers in lower elevations, and somewhat heavier activity in the mountains. The Los Angeles Civic Center monitoring station also monitors rainfall levels. Average monthly rainfall measured at this station varied from 0.025 centimeters (cm) (0.01 inches) in July to 1.22 cm (0.48 inches) in October, 3.17 cm (1.25 inches) in November, and 8.58 cm (3.38 inches) in February with an average annual total of 35.51 cm (14.77 inches).

Ambient monitoring data were obtained from the Los Angeles North Main St. Monitoring Station, which is located on 1630 North Main St., Los Angeles and is the closest to the proposed project at latitude of 34.066389 and longitude of -118.22667. The monitoring station is approximately 0.5 miles east of I-110 and about 4.0 miles south of the project site. Figure 43 illustrates the proximity of this monitoring station to the freeway and to the proposed project.

Figure 43: Location of the Representative Monitoring Station and Project Location

Source: Air Quality Analysis (September 2015)

The 2012 Annual Average Daily Traffic (AADT) at I-110/US-101 intersection near the Los Angeles North Main Street monitoring station is 182,000 with 2.67 percent trucks. The AADT at I-110/I-10 intersection near the proposed project is located was measured with AADT of 100,000 with 1.13 percent trucks in 2012.

Based on the comparison of the traffic volumes, truck percentage, land uses, and the proximity to the freeway, the ambient concentration data measured at the Los Angeles North monitoring station is deemed representative for comparison to the proposed project. The prevailing daytime sea breeze tends to transport pollutants and precursor emissions from coastal areas into the Basin's inland valleys, and from there, still further inland into neighboring areas of the Salton Sea Air Basin (SSAB) as well as the Mojave Desert Air Basin (MDAB).

A summary of the most recent three years of ambient air monitoring data at Los Angeles North Monitoring Station for criteria pollutants is provided in Table 23.

Table 23: Three Year Ambient Air Monitoring

Pollutant/Standard		2011	2012	2013
Ozone (O_3)	O_3 (1-hour)			
	Maximum Concentration (ppm)	0.087	0.093	0.081
	Days> CAAQS (0.09 ppm)	0	0	0
	O_3 (8-hour)			
	Maximum Concentration (ppm)	0.065	0.077	0.069
	Days> CAAQS (0.070 ppm)	0	2	0
	Days> NAAQS (0.075 ppm)	0	1	0
Particulate Matter (PM_{10})	PM_{10}(24-hour)			
	Maximum Concentration (ug/m3)	53.0	80.0	57.0
	Days> CAAQS (50 ug/m3)	6.5	24.2	21.4
	Days> NAAQS (150 ug/m3)	0	0	0
	PM_{10} (Annual Average)			
	National Annual Average	29.0	30.2	29.5
Particulate Matter ($PM_{2.5}$)	$PM_{2.5}$ (24-hour)			
	Maximum Concentration (ug/m3)	49.3	58.7	43.1
	Days> NAAQS (35 ug/m3)	4.5	4.2	1.1
	$PM_{2.5}$ (Annual Average)			
	National Annual Average	12.9	12.5	12.0
Carbon Monoxide	CO (1-hour)			
(CO)	Maximum Concentration (ppm)	2.8	2.2	2.5
	Days> CAAQS (20 ppm)	0	0	0
	Days> NAAQS (35 ppm)	0	0	0
	CO (8-hour)			
	Maximum Concentration (ppm)	2.40	1.91	2.0
	Days> CAAQS (9 ppm)	0	0	0
	Days> NAAQS (9 ppm)	0	0	0
Nitrogen Dioxide (NO_2)	NO_2 (1-hour - - State Standard)			
	Maximum Concentration (ppm)	0.109	0.077	0.090
	Days > CAAQS (0.18 ppm)	0	0	0
	NO_2 (1-hour - - National Standard)			
	Maximum Concentration (ppb)	109.6	77.3	90.3
	Days > NAAQS (100 ppb)	1	0	0
Sulfur Dioxide (SO_2)	SO_2 (1-hour)			
	Maximum Concentration (ppm)	0.012	0.005	0.006
	Days> CAAQS (0.25 ppm)	0	0	0
	SO_2 (24-hour)			
	Maximum Concentration (ppm)	0.002	0.002	0.002
	Days> CAAQS (0.04 ppm)	0	0	0
	Days > NAAQS (0.14 ppm)	N/A	N/A	N/A
	SO_2 (Annual Average)			
	Annual Average	*	*	*
	Days > NAAQS (0.03 ppm)	N/A	N/A	N/A

Note: * means there was insufficient data available to determine the value.

Source: Air Quality Analysis (September 2015)

Federal and State Attainment Status

Below are the criteria pollutants, and Table 24 discusses State and Federal attainment statuses of each one. Table 25 focuses on the ambient air quality standards. Health effects summary from criteria pollutants are discussed in Table 26.

Ozone (O_3)

Ozone is a toxic gas that irritates the lungs and damages materials and vegetation. Ozone is a secondary pollutant; it is not directly emitted. Ozone is a principal cause of lung and eye irritation in an urban environment. It is formed in the atmosphere through a series of reactions involving hydrocarbons (HC) and nitrogen oxides in the presence of sunlight.

Particulate Matter (PM_{10} and $PM_{2.5}$)

PM includes both aerosols and solid particles of a wide range of size and composition. Of particular concern are those particles between 10 and 2.5 microns in size (PM_{10}) and smaller than or equal to 2.5 microns ($PM_{2.5}$). The size of the PM is referenced to the aerodynamic diameter of the particulate. The PM_{10} criteria are aimed primarily at what the EPA refers to as "coarse particles." Course particles are often found near roadways, dusty industries, construction sites, and fires. The $PM_{2.5}$ criteria are referred to as "fine particles." These particles can also be directly emitted and they can also be formed when gases emitted from power plants, industries and automobiles react in the air. The principal health effect of airborne PM is on the respiratory system. Studies have linked particulate pollution with irritation of the airways, coughing, aggravated asthma, irregular heartbeat, and premature death in people with heart or lung disease.

Carbon Monoxide (CO)

CO is a colorless and odorless gas, which, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. CO combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High CO concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions. CO concentrations can vary greatly over comparatively short distances. Relatively high concentrations are typically found near crowded intersections, along heavily used roadways carrying slow moving traffic, and at or near ground level. Even under the most severe meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Overall CO emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973.

Nitrogen Oxides (NOx)

Nitrogen oxides from automotive sources are some of the precursors in the formation of ozone and secondary PM. Ozone and PM are formed through a series of photochemical reactions in the atmosphere. Because the reactions are slow and occur as the pollutants are diffusing downwind, elevated ozone levels are often found many miles from the source of precursor emission. The effects of nitrogen oxides emission are examined on a regional basis.

Lead (Pb)

Nitrogen oxides from automotive sources are some of the precursors in the formation of ozone and secondary PM. Ozone and PM are formed through a series of photochemical reactions in the atmosphere. Because the reactions are slow and occur as the pollutants are diffusing downwind, elevated ozone levels are often found many miles from the source of precursor emission. The effects of nitrogen oxides emission are examined on a regional basis.

Sulfur Oxides (SOx)

Sulfur oxides constitute a class of compounds of which sulfur dioxide (SO2) and sulfur trioxide (SO_3) are of greatest importance. The oxides are formed during combustion of the sulfur components in motor fuels. Relatively few sulfur oxides are emitted from motor vehicles since motor fuels are now de-sulfured. The health effects of sulfur oxides include respiratory illness, damage to the respiratory tract, and bronchia-constriction.

Table 24: Federal (NAAQS) and State (CAAQS) Attainment Status

South Coast Air Basin (SCAB), NAAQS and CAAQS Attainment Status					
Criteria Pollutant	NAAQS			CAAQS	
	Averaging Time	Designation (Classification)	Attainment Date	Averaging Time	Designation
2008 8-Hour Ozone	8-Hour (0.075 ppm)	Nonattainment (Extreme)	12/31/2032	0.070 ppm (137 ug/m^3)	Nonattainment
CO	1-Hour (35 ppm) 8-Hour (9 ppm)	Attainment (Maintenance)	6/11/2007 (attained)	1-Hour (20 ppm) 8-Hour (9 ppm)	Attainment
PM_{10}	24-Hour (150 ug/m^3)	Attainment (Maintenance)	N/A	24-Hour (50 ug/m^3)	Nonattainment
			N/A	Annual (20 ug/m^3)	Nonattainment
$PM_{2.5}$	24-Hour (35 ug/m^3)	Nonattainment	12/14/2014	No separate State standard	Nonattainment
	Annual (15.0 ug/m^3)	Nonattainment	4/15/2015	Annual (12.0 ug/m^3)	Nonattainment
NO_2	1-Hour (100 ppb)	Attainment/ Unclassified	N/A	0.18 ppm (339 ug/m^3)	Nonattainment
	Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998	0.030 ppm (57 ug/m^3)	Nonattainment
SO_2	1-Hour (75 ppb)	Designations Pending	N/A	0.25 ppm	Attainment
	24-Hour (0.14 ppm) Annual (0.03 ppm)	Attainment/ Unclassified	N/A	0.04 ppm (105 ug/m^3)	Attainment
Lead (Pb)	3-Months Rolling (0.15 ug/m^3)	Nonattainment (Partial-LA portion)	12/31/2015	30 day concentration (1.5 ug/m^3)	Nonattainment

Source: Air Quality Analysis (September 2015)

Air Pollution Standards

Table 25: Ambient Air Quality Standards

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)		
Respirable Particulate Matter (PM10)[8]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[8]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	12.0 µg/m^3	15 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[9]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		0.053 ppm (100 µg/m^3)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[10]	1 Hour	0.25 ppm (655 µg/m^3)	Ultraviolet Fluorescence	75 ppb (196 µg/m^3)	—	Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (for certain areas)[10]	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas)[10]	—	
Lead[11,12]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m^3 (for certain areas)[12]	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m^3		
Visibility Reducing Particles[13]	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[11]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

See footnotes on next page …

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.

8. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

9. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

10. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

11. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

12. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

13. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

For more information please call ARB-PIO at (916) 322-2990 **California Air Resources Board (6/4/13)**

Source: Air Quality Analysis (September 2015)

Table 26: Health Effect Summary from Criteria Pollutants

Pollutant	Sources	Primary Effects
Ozone (O_3)	Atmospheric reaction of organic gases with nitrogen oxides in the presence of sunlight.	Aggravation of respiratory diseases; irritation of eyes; impairment of pulmonary function; plant leaf injury.
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust; high temperature; stationary combustion; atmospheric reactions.	Aggravation of respiratory illness; reduced visibility; reduced plant growth; formation of acid rain.
Carbon Monoxide (CO)	Incomplete combustion of fuels and other carbon-containing substances, such as motor vehicle exhaust; and natural events, such as decomposition of organic matter.	Reduced tolerance for exercise; impairment of mental function; impairment of fetal development; impairment of learning ability; death at high levels of exposure; aggravation of some cardiovascular diseases (angina).
Particulate Matter (PM_{10} and $PM_{2.5}$)	Fuel combustion in motor vehicles, equipment, and industrial sources; construction activities; industrial processes; residential and agricultural burning; atmospheric chemical reactions.	Reduced lung function; aggravation of the effects of gaseous pollutants; aggravation of respiratory and cardio-respiratory diseases; increased cough and chest discomfort; siling; reduced visibility.
Sulfur Dioxide (SO_2)	Combustion of sulfur-containing fossil fuels; smelting of sulfur-bearing metal ores; industrial processes.	Aggravation of respiratory and cardiovascular diseases; reduced lung function; carcinogenesis; irritation of eyes; reduced visibility; plant injury; deterioration of materials (e.g., textiles, leather, finishes, coating).
Lead (Pb)	Contaminated soil.	Impairment of blood function and nerve construction; behavioral and hearing problems in children.

Source: Air Quality Analysis (September 2015)

Construction Emissions

According to 40 CFR93.123 (c)(5), hot-spot analyses are not required to consider construction related activities that cause temporary increases in emissions. Temporary increases in emissions are defined as those that occur only during the construction phase and that last five years or less at any individual site. The proposed project has construction durations of approximately 2.5 years. Emissions from the construction activities therefore are considered temporary pursuant to 40 CFR93.123(c)(5) and a qualitative analysis is provided accordingly.

Operational Emissions

Vehicular emissions constitute the primary source of air pollutants associated with operation of the proposed project. The direct emissions associated with vehicle traffic were estimated based on the daily traffic volumes and Vehicle Miles Traveled (VMTs) along the project corridor. Evaluation of the local impacts includes the following analyses.

Regional Conformity Requirements

The currently approved plans are the 2016 RTP/SCS and the 2015 Federal Transportation Improvement Program (FTIP). The 2016 RTP/SCS was adopted by SCAG on April 7, 2016; FHWA and FTA approved the2016 RTP/SCS on June 1, 2016. The 2015 FTIP was federally approved on December 15, 2015. The most recent Amendment to the 2015 FTIP is No. 15-19, approved by FHWA and FTA on July 13, 2016.

The proposed project is included in the most recent conforming 2016 RTP/SCS and 2015 FTIP.

The design and scope of the proposed project are the same as the design and scope in the RTP and FTIP. The proposed project therefore is considered to have satisfied the regional conformity requirements. A copy of pages from RTP and TIP identifying the proposed project is attached in Appendix D.

Project Level Conformity Requirements

Carbon Monoxide Analysis

The local analysis is commonly referred to as a project-level hot-spot analysis. Conformity must be demonstrated at the project-level for projects in CO, PM_{10}, and $PM_{2.5}$ nonattainment and maintenance areas. A region is a nonattainment area if one or more monitoring stations in the region fail to attain the relevant CAAQS or NAAQS. In general, projects must not cause the standards to be violated, and in nonattainment areas, the project must not cause any increase in the number and severity of violations. The CO Protocol has a screening exercise that would determine whether the project requires a qualitative or quantitative analysis, or whether none would be necessary which is discussed in detail in the Air Quality Analysis Report (September 2015).

Particulate Matter Hot-Spot Analysis

Procedures and methodology provided in the "Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas" released by EPA in November 2013 (EPA Quantitative Guidance) was followed. The project proposes to alleviate congestion and reduce queuing and delay in the northbound I-110 HOT lanes mainline and off-ramp; and is located in Los Angeles County, which is attainment maintenance area for PM_{10} and nonattainment for $PM_{2.5}$.

Mobile Source Air Toxics Emissions (MSAT)

As discussed in the FHWA Interim Guidance, the magnitude and the duration of the potential increases cannot be reliably quantified. Furthermore, according to the Interim Guidance, even if Vehicle Miles Traveled (VMT) increases by 102 percent as assumed from 2010 to 2050 on a national scale, a combined reduction of 83 percent in the total annual emissions for the priority MSAT is projected due to the advancement of emission control technology and modern fuels. Research into health impacts of MSATs is ongoing. Although studies have reported that proximity to the roadways is related to adverse health impacts, the FHWA Interim Guidance notes that the FHWA continues to monitor the developing research in this field. In the meantime, the current scientific techniques, tools, and data are not sufficient to accurately estimate human health impacts that could result from a transportation project in a way that would be useful to decision-makers.

Naturally Occurring Asbestos (NOA)

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air disease. Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards.

These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects and other improvement projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. The California Department of Conservation, Division of Mines and Geology have developed a map of the state showing the general location of ultramafic rock in the state. Los Angeles County is one of the Counties identified as one of the Counties containing serpentinite and ultramafic rock. However, only the Catalina Island portion of Los Angeles County has been found to contain such rock.

Fugitive Dust

Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site could deposit mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of equipment operating. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no construction impacts would occur. Operationally, without the proposed Build Alternative air quality will likely worsen due to the lack of traffic circulation and the increased idling time. Please refer to the Traffic and Transportation section (section 2.1.8) in this document to see delays expected without the implementation of the proposed project.

Alternative 2 (Build Alternative):

Potential Construction Impacts

The proposed project has construction durations of approximately 2.5 years. Emissions from the construction activities therefore are considered temporary pursuant to 40 CFR93.123(c) (5). During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to construction. The proposed project is located within the SCAB and is required to comply with the respective SCAQMD Fugitive Dust Rule to minimize emissions of fugitive dust during construction activities. Emissions from construction equipment also are anticipated and would include CO, NOx, VOCs, directly-emitted particulate matter (PM_{10} and $PM_{2.5}$), and toxic air contaminants such as diesel exhaust particulate matter. Ozone is a regional pollutant that is derived from NOx and VOCs in the presence of sunlight and heat. Construction activities associated with the Build Alternative of the proposed project would be temporary and would not require more than five years to complete; therefore, construction emissions are not considered for conformity purposes.

An estimate of approximate construction emissions is provided using the latest Sacramento Metropolitan Air Quality Management District's Road Construction Model (http://airquality.org/ceqa/RoadConstructionEmissionsModelVer7_1_5_1.xls). While the model was developed for Sacramento conditions in terms of fleet emission factors, silt loading, and other modeling assumptions, it is considered adequate for estimating road construction emissions by the San Joaquin Valley Air Pollution Control District under its Indirect Source regulations and the SCAQMD in its CEQA guidance; and is used for that purpose in this project analysis. See Appendix in the Air Quality Analysis Report (September 2015) for construction emissions calculations, based on the engineer's estimate of construction activities.

In addition to fugitive dust emissions, heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NOx, VOCs and some soot particulate (PM_{10} and $PM_{2.5}$) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to certain sensitive receptors, certain construction activities, e.g., extended idling, material storage, and equipment maintenance, would need to be conducted in areas at least 500 feet away from those sensitive receptors.

SO_2 is generated by oxidation during combustion of organic sulfur compounds contained in diesel fuel. Off-road diesel fuel meeting Federal standards can contain 300 parts per million (ppm) or more of sulfur, whereas on-road diesel is restricted to less than 15 ppm of sulfur. However, under California law and ARB regulations, off-road diesel fuel used in California must meet the same sulfur and other standards as on-road diesel fuel (not more than 15 ppm), thus SO_2-related issues due to diesel exhaust will be minimal. Some phases of construction, particularly asphalt paving, would result in short-term odors in the immediate area of each paving site(s). Such odors would be quickly dispersed below detectable thresholds as distance from the site(s) increases.

Potential Operational Impacts

Operationally, air quality improvements are anticipated as a result of the proposed Build Alternative because traffic circulation will improve and reduce the delay time, which in turn reduces the amount of time automobiles will idle. Please refer to the Traffic and Transportation section (section 2.1.8) in this document to see improvements in average delay time with the implementation of the proposed Build Alternative.

Regional Conformity

A comprehensive analysis of project-level CO, PM10, and PM2.5 has concluded the proposed project has demonstrated conformity at the project-level with the purpose of the State Implementation Plan in regards to attaining the ambient air quality standards. The project is included in the latest conforming 2016 RTP/SCS and 2015 FTIP; and the project has satisfactorily demonstrated regional conformity requirements. A copy of pages from RTP and TIP listing the proposed project is attached in Appendix D.

Project Level Conformity

Carbon Monoxide Analysis

The carbon monoxide (CO) hot spot analysis demonstrates that project meets the requirements of 40 CFR 93.116 and 123; project will not cause or contribute to a new violation of the CO standards.

Particulate Matter Analysis

The SCAG's Transportation Conformity Working Group (TCWG) has concurred on August 26, 2014, and reaffirmed on April 38, 2015, that the project is not of air quality concern for PM_{10} and $PM_{2.5}$. The Environmental Protection Agency (EPA) has determined that projects not of air quality concern meet the provisions of the CAA Section 176(c)(B) without an explicit hot-spot analysis.

MSAT Analysis FHWA Concurrence Letter on Project Level Conformity

The MSAT analysis acknowledges that the project would result in increase in MSAT emissions for the Build Alternative when compared to the No Build. However, it should be noted that most MSAT emissions for the Build Alternative are anticipated to decrease when compared to the base year condition. Future emissions of other pollutants other than MSATs, GHG, and PMs are also estimated in a manner similar to the estimates of MSATs. Emission of ROG, TOG, CO, and NO_x are compared to those for the No Build and the base year conditions. Based on the comparison, these pollutants

also exhibit a trend similar to most of the MSATs and result in decrease from the base year conditions.

Avoidance, Minimization, and/or Mitigation Measures

Minimization AQ-1: Compliance with Caltrans' Standard Specifications in Section 14 (2010) will be required.

Minimization AQ-2: Section 14-9.01 specifically requires compliance with all applicable laws and regulations related to air quality, including SCAQMD rules and regulations and local ordinances.

Minimization AQ-3: 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.

Minimization AQ-4: 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 as required by the SCAQMD.

Minimization AQ-5: Spread soil binder on any unpaved roads used for construction purposes, and all project construction parking areas.

Minimization AQ-6: Wash off trucks as they leave the R/W as necessary to control fugitive dust emissions.

Minimization AQ-7: 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.

Minimization AQ-8: Develop a dust control plan documenting sprinkling, temporary paving, speed limits, and expedited re-vegetation of disturbed slopes as needed to minimize construction impacts to existing communities.

Minimization AQ-9: Locate equipment and materials storage sites at least 500 feet from the sensitive receptors. Keep construction areas clean and orderly.

Minimization AQ-10: Establish environmentally sensitive areas (ESAs) or their equivalent at least 500 feet away from sensitive air receptors within which construction activities such as extended idling, material storage, and equipment maintenance, would be prohibited, to the extent feasible.

Minimization AQ-11: 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.

Minimization AQ-12: 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.

Minimization AQ-13: Promptly and regularly remove dust and mud that are deposited on paved, public roads due to construction activity and traffic to decrease particulate matter.

Avoidance AQ-14: 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.

Minimization AQ-15: Install mulch or plant vegetation as soon as practical after grading to reduce windblown particulates 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.

Avoidance AQ-16: While unlikely, if naturally occurring asbestos, serpentine, or ultramafic rock is discovered during grading operations Section 93105, Title 17 of the California Code of Regulations requires notification to the SCAQMD by the next business day and implementation of the following measures within 24 hours:

- Unpaved areas subject to vehicle traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos
- The speed of any vehicles and equipment traveling across unpaved areas must be no more than fifteen (15) miles per hour unless the road surface and surrounding area is sufficiently stabilized to prevent vehicles and equipment traveling more than 15 miles per hour from emitting dust that is visible crossing the project boundaries
- Storage piles and disturbed areas not subject to vehicular traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos
- Activities must be conducted so that no track-out from any road construction project is visible on any paved roadway open to the public

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2.2.6 Noise and Vibration

Regulatory Setting

The National Environmental Policy Act (NEPA) of 1969 and the California Environmental Quality Act (CEQA) provide the broad basis for analyzing and abating highway traffic noise effects. The intent of these laws is to promote the general welfare and to foster a healthy environment. The requirements for noise analysis and consideration of noise abatement and/or mitigation, however, differ between NEPA and CEQA.

California Environmental Quality Act

CEQA requires a strictly baseline versus build analysis to assess whether a proposed project will have a noise impact. If a proposed project is determined to have a significant noise impact under CEQA, then CEQA dictates that mitigation measures must be incorporated into the project unless those measures are not feasible. The CEQA noise analysis is included at the end of this section.

National Environmental Policy Act and 23 CFR 772

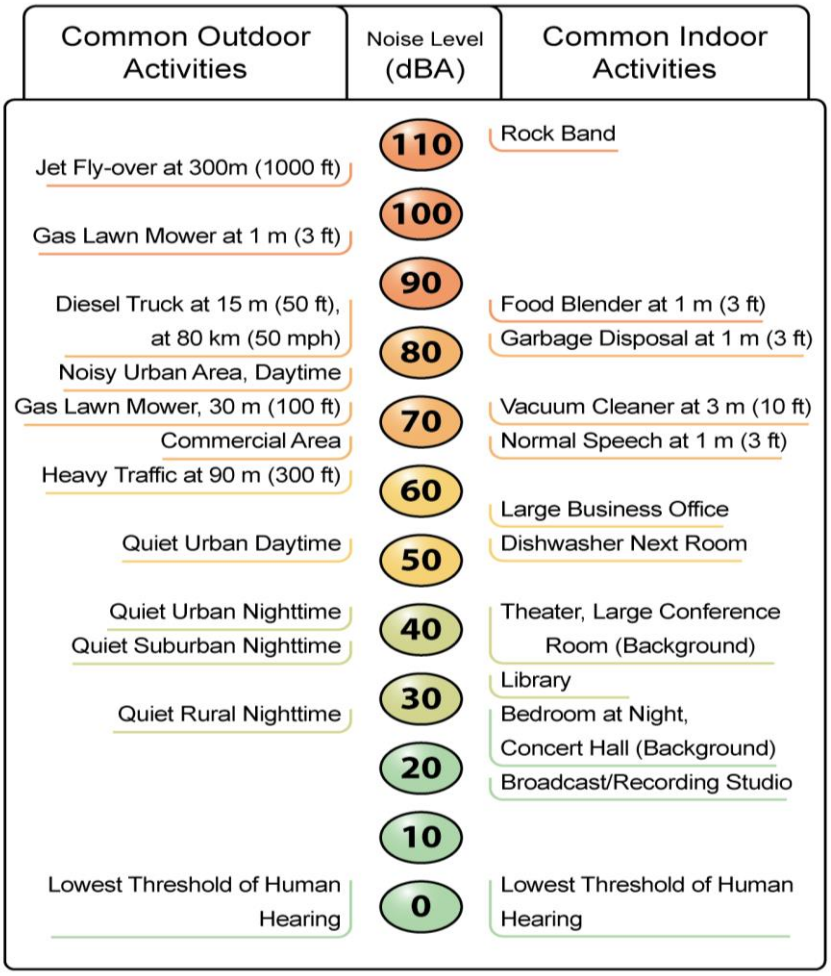
For highway transportation projects with FHWA (and the Department, as assigned) involvement, the federal-Aid Highway Act of 1970 and the associated implementing regulations (23 CFR 772) govern the analysis and abatement of traffic noise impacts. The regulations require that potential noise impacts in areas of frequent human use be identified during the planning and design of a highway project. The regulations include noise abatement criteria (NAC) that are used to determine when a noise impact would occur. The NAC differ depending on the type of land use under analysis. For example, the NAC for residences (67 dBA) is lower than the NAC for commercial areas (72 dBA). The following table lists the noise abatement criteria for use in the NEPA 23 CFR 772 analysis. Please refer to Table 27 for Noise Abatement Criteria for both interior and exterior noise levels, and Figure 44 lists common activities that will illustrate the noise levels.

Table 27: Noise Abatement Criteria

Activity Category	NAC, Hourly A-Weighted Noise Level, Leq(h)	Description of activity category
A	57 (Exterior)	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B[1]	67 (Exterior)	Residential.
C[1]	67 (Exterior)	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings.
D	52 (Interior)	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.
E	72 (Exterior)	Hotels, motels, offices, restaurants/bars, and other developed lands, properties, or activities not included in A–D or F.
F	No NAC—reporting only	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical, etc.), and warehousing.
G	No NAC—reporting only	Undeveloped lands that are not permitted.

[1] Includes undeveloped lands permitted for this activity category.

Figure 44: List of Noise Levels Common Activities



According to the Department's *Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, August 2006,* or if the project is using the 2011 Noise Protocol *Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, May 2011*, a noise impact occurs when the predicted future noise level with the project substantially exceeds the existing noise level (defined as a 12 dBA or more increase) or when the future noise level with the project approaches or exceeds the NAC. Approaching the NAC is defined as coming within 1 dBA of the NAC.

If it is determined that the project will have noise impacts, then potential abatement measures must be considered. Noise abatement measures that are determined to be reasonable and feasible at the time of final design are incorporated into the project plans and specifications. This document discusses noise abatement measures that would likely be incorporated in the project.

The Department's *Traffic Noise Analysis Protocol* sets forth the criteria for determining when an abatement measure is reasonable and feasible. Feasibility of noise abatement is basically an engineering concern. A minimum 5 dBA reduction 7 dBA (for projects using the 2011 Noise Protocol and is part of the reasonableness analysis in the future noise level must be achieved for an abatement measure to be considered feasible. Other considerations include topography, access requirements, other noise sources, and safety considerations. The reasonableness determination is basically a cost-benefit analysis. Factors used in determining whether a proposed noise abatement measure is reasonable include: residents' acceptance and the cost per benefited residence.

Affected Environment

This project is considered a Type 1 Project, which is defined by Federal Highway Administration (FHWA) as a proposed Federal or Federal –aid highway project for the construction of a highway on a new location, or the physical alteration of an existing highway which significantly changes either the horizontal or vertical alignment, or increases the number of through traffic lanes.

According to the Traffic Noise Study Report (April 2015), a field investigation was conducted to identify land uses that could be subject to traffic and construction noise impacts from the proposed project. The following categories were identified in the area: residential were identified as Activity Category B, schools and medical facilities were identified as Activity Category C, places of worship were identified as Activity Category C for exterior location and as Activity Category D for interior location land uses in the Project Area. As required by the Protocol, all developed land uses are evaluated in this analysis. However noise abatement is only considered for areas of frequent human use that would benefit from a lowered noise level. Accordingly, this impact analysis focuses on locations with defined outdoor activity areas, such as residential, schools, places of worship and medical facilities.

Existing Traffic Noise

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level readings was conducted to determine the noisiest hour within the project limits. Refer to Table 28 for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Table 29 for a summary of background noise measurements which is less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

The noise measurement sites were selected taking into consideration the following general site requirements:

- Sites were acoustically representative of areas and conditions of interest. They were located at areas of human use
- Sites were clear of major obstructions between source and receiver Microphone positions were more than 10 feet away from reflecting surfaces
- Sites were free of noise contamination by sources other than those of interest. Sites were not located near barking dogs, lawn mowers, pool pumps, air conditioners, etc.
- Sites were not exposed to prevailing meteorological conditions that are beyond the constraints discussed in the Technical Noise Supplement (TeNs)

Table 28: Summary of Short-Term Noise Measurements LA-110 between 30th Street and 23rd Street

Site	Address	Land Use	Date	Start Time	Duration (minutes)	Measured Leq-dBA	Freeway Direction	Number of MF Lanes	Autos	Medium Trucks	Heavy Trucks	Buses	Motorcycles	Observed Speed (mph)
R2	2916 S. Hope St	school	7/23/2014	12:13 PM	10	62.5	SB	5	1637	21	21	5	4	65
							NB	5	1339	14	32	2	2	60
							SB	1	9	0	0	3	on-ramp @ Flower St.	
							NB	1	14	1	0	0	off-ramp @ Adams	
							NB	1	52	2	0	2	HOV off-ramp @ Adams	
R3	2829 S. Grand Ave	Medical facility	7/23/2014	12:32 PM	10	65.6	SB	5	1576	27	23	2	2	65
							NB	5	1328	32	19	2	3	50
							SB	1	15	0	0	4	on-ramp @ Flower St.	
							NB	1	12	1	0	0	off-ramp @ Adams	
							NB	1	39	0	0	0	HOV off-ramp @ Adams	
R4	403 West Adams Blvd	Residential	7/23/2014	12:55 PM	10	64.8	SB	5	1601	32	29	3	1	65
							NB	5	1421	21	17	5	3	30
							SB	1	9	0	0	3	on-ramp @ Flower St.	
							NB	1	14	1	0	0	off-ramp @ Adams	
							NB	1	52	2	0	2	HOV off-ramp @ Adams	
R5	2315 Flower St	Residential	7/24/2014	10:30 AM	10	67.3	SB	5	1436	28	33	4	7	65
							NB	5	1339	26	35	3	2	45-50
R6	621 W. Adams Blvd	Church	7/24/2014	11:16 AM	10	63.2	SB	5	1394	39	32	3	2	65
							NB	5	1513	25	26	2	3	65
							NB	3	439	12	5	9	Figueroa St.	35
							SB	2						

Source: Traffic Noise Report (April 2015)

Table 29: Summary of Background Noise Measurements

Site	Address	Freeway Direction	Land Uses	Start Time	Date	Duration (minutes)	Measured Leq dBA
BG1	19 St. James Place	SB	Residential	10:39 AM	8/28/2014	10	54.8
BG2	131 24 th Street	NB	Residential	11:01 AM	8/28/2014	10	53.5

Source: Traffic Noise Report (April 2015)

Table 30: Summary of Long-Term Measurements I-110 Figueroa Street Overcrossing

Site	Address	Land Uses	Start Time	Start Date	Duration (Hours)	Noisiest Hour	
						Noise Level (dBA)	Time
R1	514 W Adams Blvd	Church	10:57 AM	7/23/2014	24	71.3	5:17 AM - 6:17 AM

Source: Traffic Noise Report (April 2015)

Ground Vibration

According to the Noise and Vibration Manual (September 2013), there are no Caltrans or Federal Highway Administration standards for vibration. The duration and amplitude of vibration generated by construction and maintenance equipment varies widely depending on the type of equipment and the purpose for which it is being used. The vibration from blasting has a high amplitude and short duration; whereas vibration from grading is lower in amplitude but longer in duration. In assessing vibration from construction and maintenance equipment, it is useful to categorize the equipment by the nature of the vibration generated. Various equipment categories according to type of vibration and/or activities in each category are discussed below. Equipment or activities typical of continuous vibration include

- Excavation equipment
- Static compaction equipment
- Tracked vehicles
- Traffic on a highway
- Vibratory pile drivers
- Pile-extraction equipment
- Vibratory compaction equipment

Equipment or activities typical of single-impact (transient) or low-rate repeated impact vibration include:

- Impact pile drivers
- Blasting
- Drop balls
- “Pogo stick” compactors and crack-and-seat equipment

Equipment typical of high-rate repeated impact vibration includes jackhammers and pavement breakers.

Vibration generated by construction activity has the potential to damage structures. The damage could be structural damage, such as cracking of floor slabs, foundations, columns, beams, or wells, or cosmetic architectural damage, such as cracked plaster, stucco, or tile. Ground vibration also has the potential to disrupt the operation of vibration-sensitive research and advanced technology equipment. This equipment can include optical microscopes, cell probing devices, magnetic resonance imaging (MRI) machines, scanning electron microscopes, photolithography equipment, micro-lathes, and precision milling equipment. The degree to which this equipment is disturbed depends on the type of equipment, how it used, and its support structure. Vibration concerns involving pavement breaking, extensive pile driving, 7.5 m (25 ft) or less from normal residences, buildings, or unreinforced structures, damage is a possibility. If these operations occur within 15 m–30 m (50 ft-100 ft) from historical buildings, buildings in poor condition, or buildings previously damaged in earthquakes damage is possible.

Also mentioned in the Noise and Vibration Manual, the Federal Transit Administration's Transit Noise and Vibration Impact Assessment (Federal Transit Administration 2006) and National Cooperative Highway Research Program (NCHRP) Synthesis 218 (Schexnayder and Ernzen 1999) state that continuous operation at a fixed frequency may be more noticeable to nearby residents, even at lower vibration levels. In addition, the steady-state excitation of the ground may increase the response at the resonance frequency of building components. Response may be unacceptable in cases of fragile historical buildings or vibration sensitive manufacturing processes. Impact pile drivers, conversely, produce high vibration levels for a short duration (0.2 second) any may have sufficient time between impacts to allow any resonant response to decay.

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

During the construction phases of the project, noise from construction activities may intermittently dominate the noise environment in the immediate area of construction. Construction noise is regulated by Caltrans standard specifications, Section 7-1.01I, Sound Control Requirements. These requirements state that noise levels generated during construction shall comply with applicable Local, State, and Federal regulations.

Figure 45 summarizes typical noise levels produced by construction equipment commonly used on roadway construction projects. As indicated, equipment involved in construction is expected to generate noise levels ranging from 70 to 90 dBA at a distance of 50 feet. Noise produced by construction equipment would be reduced over distance at a rate of about 6 dBA per doubling of distance. Normally, construction noise levels should not exceed 86 dBA (Lmax) at a distance of 50 feet.

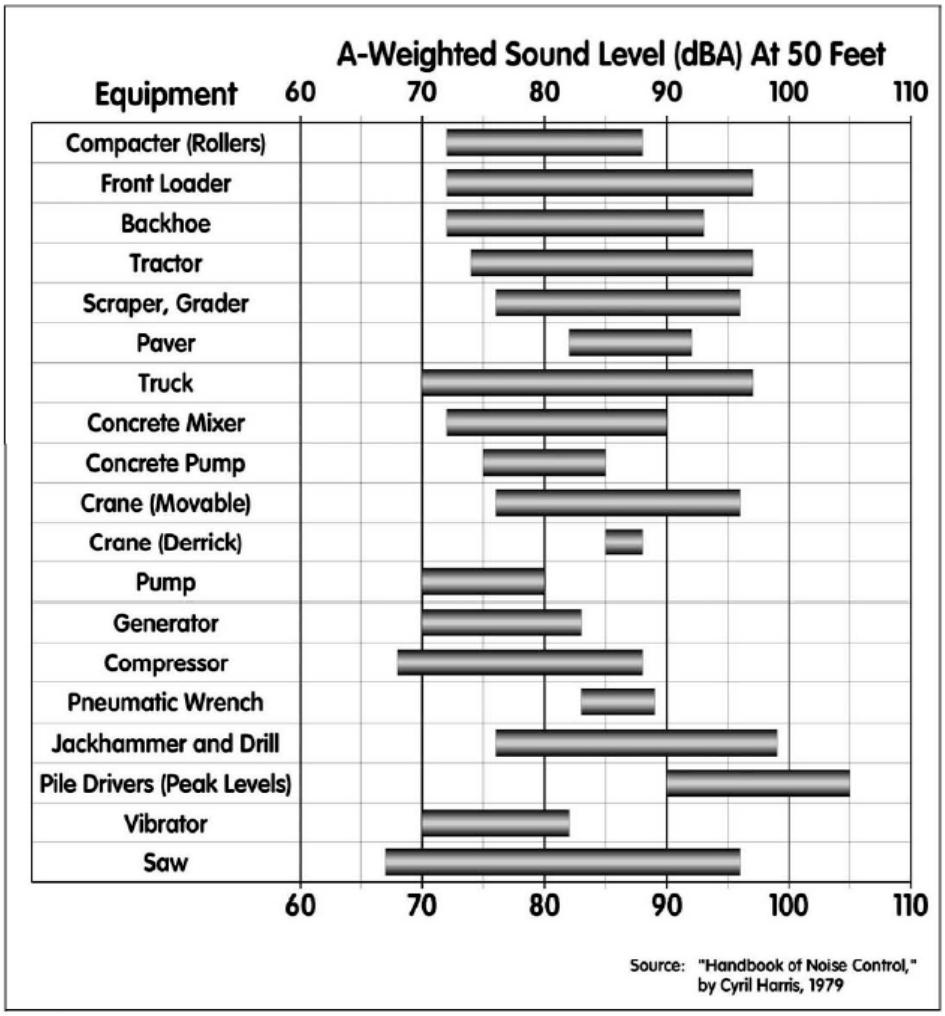
As far as construction vibration effects are concerned, based on construction standards in the Caltrans (2013) Transportation and Construction Vibration Guidance Manual, the probability of exceeding architectural damage risk amplitudes for continuous vibrations (such as excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment) from construction is very low, and from freeway traffic is practically non-existent.

However, if vibration concerns involve pavement breaking, extensive pile driving, or trains, 25 feet (7.5 meters) or less from normal residences, buildings, or unreinforced structures, damage is a real possibility. This may also be true if these operations occur within 50–100 feet (15–30 meters) from historic buildings, buildings in poor condition, or buildings previously damaged in earthquakes. In any case, extreme care must be taken when sustained pile driving occurs within 25 feet (7.5 meters) of any building, and 50–100 feet (15– 30 meters) of a historic building, or a building in poor condition. Although, the exact method of constructing the concrete column supports/bents has not been identified at this stage of the design process, Caltrans is only considering the use of vibration reduction construction methods, such as Cast-In-Place Concrete Piles or Jetting , for Alternative 2 (Proposed Build Alternative).

Additionally, construction-related ground disturbance in the immediate vicinity of St. John’s Episcopal Church will occur at more than 160–230 feet from the east side of the St. John’s Episcopal Church building. Therefore, no vibration effects to St. John’s Episcopal Church building are anticipated. Although there is sufficient distance between the construction site and sensitive receptors, minimization GV-1 below will be implemented in order to ensure that ground vibration is kept to a minimum.

Potential construction impacts will be minimized with the incorporation of avoidance measure N-1, and minimization measures N-2 through N-4.

Figure 45: Construction Equipment Noise Levels



Source: Traffic Noise Report (April 2015)

Potential Operational Impacts

Future noise levels were predicted using traffic characteristics that would yield the worst hourly traffic noise impact on a regular basis. As described in Section 5.3 of the Traffic Noise Report (April 2015), design year (2040) traffic volumes were used as the future traffic for area between 30th Street and Figueroa Street Overcrossing. Table 35 summarizes the traffic noise modeling results for existing conditions and design-year conditions with and without the project.

Predicted design-year traffic noise levels with the project are compared to existing conditions and to design-year no-project conditions. The comparison to existing conditions is included in the analysis to identify traffic noise impacts under 23CFR772. The comparison to future no build condition indicates the traffic noise level slightly increases because of the project resulting from the project at 4 locations R3 (2829 S. Grand Ave.), R4 (403 West Adams Blvd.), M2 (2706 W. 182nd St.), and M3 (2706 W. 182nd St.) as seen in Table 31. This slight dBA increase between existing noise levels and the Build Alternative would be barely perceptible to the human ear. Therefore, under CEQA, no significant noise impact would occur as a result of the project and no mitigation is required. However, under NEPA 23 CFR 772, noise abatement would need to be considered.

As stated in the TeNS, modeling results are rounded to the nearest decibel before comparisons are made. In some cases, this can result in relative changes that may not appear intuitive. An example would be a comparison between sound levels of 64.4 and 64.5 dBA. The difference between these two values is 0.1 dBA. However, after rounding, the difference is reported as 1 dBA. Predicted noise levels have been rounded (to the nearest whole number) only after the determination of traffic noise impacts.

Table 31: Traffic Noise Measurements & Modeling Results - LA 110

Receiver	Direction	Location	Land Use	Noise Abatement Category	Field-Measured Noise Level	Modeled Noise Level	K - Factor	Existing Worst-Hour Noise Level ***	Future (2040) No Build Noise Level **	Noise Increase (No Build Vs. Existing)	Future Worst-Hour Noise Level Alternative 2 **	Impact Type	Noise Increase (Build Vs. Existing)	Noise Increase (Build Vs. No Build)
R1^	SB	514 W Adams Blvd	CH	D(52)	45.0	-	-	47.6	45.0	-2.6	46.7	N	-0.9	1.7
M1	SB	514 W Adams Blvd		C(67)	-	61.6	-1	62.3	61.6	-0.7	63.3	N	1.0	1.7
R2	Northbound	2916 S Hope St	S	C (67)	62.5	62.7	-0.2	67.7	63.3	-4.4	63.4	N	-4.3	0.1
R3		2829 S Grand Ave	M		65.6	63.9	1.7	68.8	66.8	-2	67	A/E	-1.8	0.2
R4		403 West Adams Blvd			64.8	66.8	-2	67.7	67.5	-0.2	67.7	A/E	0.0	0.2
R5		2315 Flower St	O	E (72)	67.3	68.7	-1.4	70.4	68.2	-2.2	68.4	N	-2.0	0.2
R6^	Southbound	621 W Adams Blvd	CH	D(52)	45.9	-	-	47.6	47.6	0	45.9	N	-1.7	-1.7
R6		621 W Adams Blvd		C (67)	63.2	64.2	-1	64.9	63.3	0	63.7	N	-1.2	0.4
M2		2706 W 182nd St	R	B (67)	-	68	-1	69.6	68.3	-1.3	69.2	A/E	-0.4	0.9
M3		2706 W 182nd St			-	69.7	-1	70.3	69.6	-0.7	70.4	A/E	0.1	0.8

Note: All noise levels are in dBA-Leq(h) ^ Interior Noise Reading
Land Use: R=Residential; S=School; CH=Church; M=Medical Facility; O=Office
Impact Type: N=No Impact; A/E=Approach/Exceed
**All future Alternative 2 & no build noise levels are based on freeway traffic only
*** Noise level includes the traffic from the local streets and other sources such as airplane, train, etc

Source: Traffic Noise Report (April 2015)

Traffic noise impacts are predicted to occur at Activity Categories B (residential) and C (active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings) land uses within the Project Area, and noise abatement has been considered. The following is a discussion of each area where traffic noise impacts are predicted.

Activity Category A (Exterior Noise Level) is defined as lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.

There are no land use activities under this activity category.

Activity Category B (Exterior Noise Level) is defined as residential.
All impacted residential areas have been considered for noise abatement .Traffic noise impacts are considered to occur at receiver locations where predicted design year 2040 noise levels approach (within 1) or exceed the Noise Abatement Criteria (NAC) of 67 dBA. It was determined that soundwall would not be feasible at any location for the residential areas due to its location with respect to the freeway, local streets and to the existing Light Rail Transit on the Flower Street.

Activity Category C (Exterior Noise Level) is defined as active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings.

1) County Kids Place Kinder Care is located at the corner of 30th Street and Hope Street along northbound I-110. Based on the analysis, noise level impacts have not been predicted to occur at this school under the build alternative. Therefore, no noise abatement has been considered.

2) H Claude Hudson Comprehensive medical facility located at the corner of 28th Street and Hope Street along northbound I-110. Based on the analysis, the exterior area of frequent human use at this medical facility is impacted by the freeway traffic noise. Therefore, noise abatement has been considered in the form of a soundwall. However, based on the analysis, an 8-16 feet soundwall along the freeway provides only 2-3 dB noise reduction, which does not provide the minimum reduction of 5 dB for acoustical feasibility and 7 dB noise reduction to at least one receiver for reasonableness. Therefore, no noise abatement has been considered.

3) Hospital Orthopedic Institute for Children located at the corner of Adams Blvd. and Hope Street along northbound I-110. Since noise impact was identified at this site based on the predicted noise level with the project, it has been determined that due to the configuration of local Streets (Adams Street and Flower Blvd.), a continuous barrier along the right of way would not be possible to construct. Any gaps in a barrier would render it acoustically infeasible. Therefore, no noise barrier would be feasible at any location due to the location of the hospital with respect to the freeway.

4) St John's Cathedral Church is located at the corner of Adams Blvd and Flower Street along southbound I-110. Based on the analysis, no noise impacts were predicted to occur at this church under Build Alternative for both interior and exterior sites at this church. Therefore, no noise abatement has been considered.

5) St Vincent Catholic church is located at the corner of Adams Blvd. and Figueroa St. along southbound I-110. Based on the analysis, no noise impacts were predicted to occur at this church under build alternative for the exterior site at this church. Therefore, no noise abatement has been considered.

Activity Category D (Interior Noise Level) is defined as auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.

Noise sensitive land uses under this activity category include a day care center and places of worship.

1) St. John's Cathedral Church and St. Vincent Catholic Church- two interior noise measurements were conducted for each one. The interior future worst-hour noise levels for each one within the project limits would not approach or exceed the NAC of 52 dB. The predicted interior noise level for each location is 47.6 dB.

2) County Kids Place Kinder Care – the interior traffic noise level of 43.4 dB within the project limits would not approach or exceed the NAC of 52 dB. This assumes a noise insertion loss of 20 dB or more with the windows closed.

Activity Category E (Exterior Noise Level) is defined as hotels, motels, offices, restaurants/bars, and other developed lands, properties, or activities not included in A–D or F.

Noise sensitive land uses under this activity category include a motel and restaurants.

1) New Aater Motel is located at the corner of 29th Street and Flower Street along northbound I-110. This Motel has no area of frequent human use. Therefore, no noise abatement has been considered.

2) There are several restaurants within the project limits a McDonald's, a Panda Express, a Carl's Jr. and Taco Bell; however, these restaurants do not have any outside eating area that would be considered areas of frequent human use.

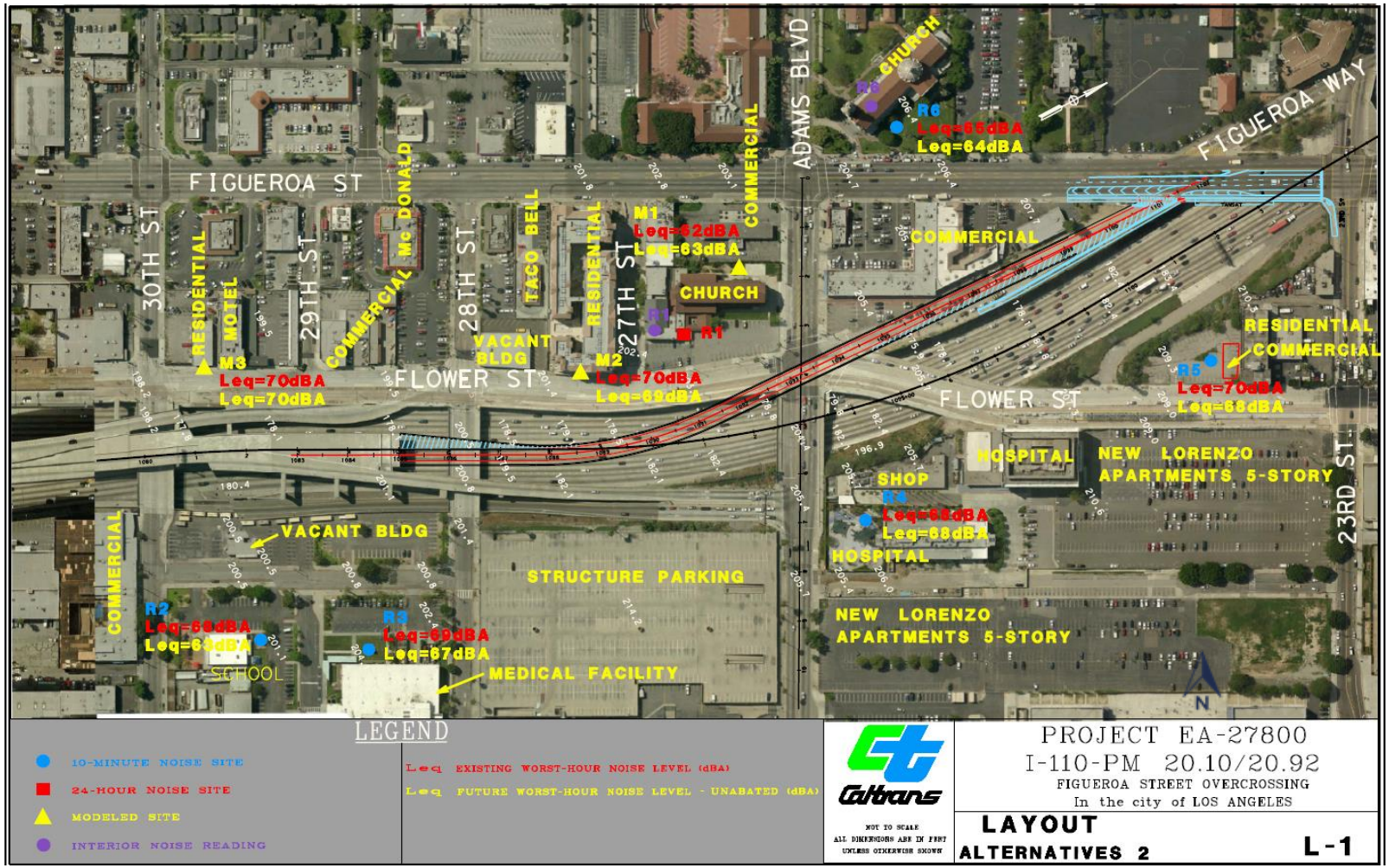
3) Drafting office is located at the corner of Flower Street and 23rd Street along northbound I-110. This office has a sitting area facing the freeway. The predicted worst-hour noise level of 68 dBA for this site is below the noise abatement criteria level of 72 dBA-Leq (h), which is the equivalent sound level over one hour for a commercial development. Therefore, no noise abatement has been considered.

Activity Category F is defined as agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical, etc.), and warehousing.

There are several commercial buildings, maintenance facilities, manufacturing, retail facilities, and warehouses located within the project limits. However, these types of land uses are not considered to be sensitive noise receptors. Figure 46 illustrates the location of potential noise receptors.

In conclusion, no operational noise or ground vibration is anticipated as a result of the proposed Build Alternative.

Figure 46: Location of Potential Noise Receptors



Source: Traffic Noise Report (April 2015)

The following section discusses the acoustically feasible sound barriers for this project. In accordance with State and Federal policies, noise barriers are not required to reduce noise levels to below the 67 dB threshold (or other NAC). A noise barrier, however, must be acoustically feasible (provide at least 5 dB noise reduction at impacted receivers) and reasonable (7 dB noise reduction to at least one receiver).

Table 32: Predicted Noise Reduction for Soundwalls between 30th Street and Adams Blvd, NB I-110. - Alternative 2

Receiver	Predicted Worst-Hour Noise Level	Soundwall Number(s)	Soundwall Location	8 Ft.		10 Ft.		12 Ft.		14 Ft.		16 Ft.	
				Noise Level (dBA)	Noise Reduction (dBA)	Noise Level (dBA)	Noise Reduction (dBA)	Noise Level (dBA)	Noise Reduction (dBA)	Noise Level (dBA)	Noise Reduction (dBA)	Noise Level (dBA)	Noise Reduction (dBA)
R3	67	SW-1+SW-2 +SW-3	R/W	65	2	65	2	65	2	65	2	65	3

R/W Right of Way

Note: Soundwall heights that provide 5 dBA or more noise reduction are in bold and yellow shaded

Feasibility Requirement: Soundwall must provide at least 5 dB noise reduction at impacted receiver
Reasonableness Requirement: Soundwall must provide at least 7 dB noise reduction at one or more benefited receptors

Source: Traffic Noise Report (April 2015)

Existing Sound Barriers

There are no existing sound barriers within the project limits. Refer to Figure 42 for a map of potential noise receptors.

Description of Acoustically Feasible Sound Barriers

Noise abatement has been considered in the form of soundwalls for the impacted receptors. However, it has been determined that due to the location of receivers and the configuration of local streets, a continuous barrier along the right of way would not be possible to construct. Any gaps in a barrier would render it acoustically infeasible.

Description of Acoustically NOT Feasible Sound Barriers

Soundwalls SW-1 + SW-2 + SW-3, analyzed (Table 32 shows the predicted noise reduction for soundwalls between 30th street and Adams Blvd, NB I-110-Alternative 2) on the right of way along the northbound I-110 would not provide the minimum required noise reduction of 5 decibel to the impacted receivers (represented by sites R2 (2916 S. Hope Street) and R3(2829 S. Grand Ave) that are located higher above the freeway in elevation, and these soundwalls (up to 16 ft. in height) were deemed to be not acoustically feasible due to topography in the area.

Avoidance, Minimization, and/or Noise Abatement Measures

Avoidance N-1: Equipment Noise Control will be applied to revising old equipment and designing new equipment to meet acceptable noise levels.

- Mufflers are very effective devices which reduce the noise emanating from the intake or exhaust of an engine, compressor, or pump. The fitting of effective mufflers on all new equipment and retrofitting of mufflers on existing equipment is necessary to yield an immediate noise reduction at all types of road construction sites
- Sealed and lubricated tracks for crawler mounted equipment will lessen the sound radiated from the track assembly resulting from metal to soil and metal to metal contact. Contractors, site engineers, and inspectors should ensure that the tracks are kept in excellent condition by periodic maintenance and lubrication
- Lowering exhaust pipe exit height closer to the ground can result in an off-site noise reduction. Barriers are more effective in attenuating noise when the noise source is closer to ground level
- General noise control technology can have substantially quieter construction equipment when manufacturers apply state-of-the-art technology to new equipment or repair old equipment to maintain original equipment noise levels

Minimization N-2: In-Use Noise Control where existing equipment is not permitted to produce noise levels in excess of specified limits.

Any equipment that produces noise levels less than the specified limits would not be affected. However, those exceeding the limit would be required to meet compliance by repair, retrofit, or replacement. New equipment with the latest noise sensitive components and noise control devices are generally quieter than older equipment, if properly maintained and inspected regularly. They should be repaired or replaced if necessary to maintain the in-use noise limit. All equipment applying the in use noise limit would achieve an immediate noise reduction if properly enforced.

Minimization N-3: Site Restrictions is an attempt to achieve noise reduction through modifying the time, place, or method of operation of a particular source. Site restrictions should be applied to achieve noise reduction through different methods, resulting in an immediate reduction of noise emitted to the community without requiring any modification to the source noise emissions. The methods include shielding with barriers for equipment and site, truck rerouting and traffic control, time scheduling, and equipment relocation. The effectiveness of each method depends on the type of construction involved and the site characteristics.

Shielding with barriers should be implemented at an early stage of a project to reduce construction equipment noise. The placement of barriers must be carefully considered to reduce limitation of site access. Barriers may be natural or man-made, such as excess land fill used as a temporary berm strategically placed to act as a barrier.

- Efficient rerouting of trucks and control of traffic activity on construction site will reduce noise due to vehicle idling, gear shifting and accelerating under load. Planning proper traffic control will result in efficient workflow and reduce noise levels. In addition, rerouting trucks does not reduce noise levels but transfers noise to other areas that are less sensitive to noise
- Time scheduling of activities should be implemented to minimize noise impact on exposed areas. Local activity patterns and surrounding land uses must be considered in establishing site curfews. However, limiting working hours can decrease productivity. Sequencing the use of equipment with relatively low noise levels versus with relatively high noise levels during noise sensitive periods is an effective noise control measure
- Equipment location should be as far from noise sensitive land use areas as possible. The contractor should substitute quieter equipment or use quieter construction processes at or near noise sensitive areas

Minimization N-4: Personal Training of operators and supervisors is needed to become more aware of the construction site noise problems.

Educating contractors and their employees to be sensitive to noise impact problems and noise control methods. This may be one of the most cost-effective ways to help operators and supervisors become more aware of the construction site noise problem and to implement the various methods of improving the conditions. A training program for equipment operators is recommended to instruct them in methods of operating their equipment to minimize environmental noise. Many training programs are presently given on the subject of job safety. This can be extended to include the impact due to noise and of abatement.

Minimization GV-1: As recommended in the Noise and Vibration Manual (September 2013), impact pile driving can be the most significant source of vibration at construction sites. The principal means of reducing vibration from impact pile driving are listed below. Some of these methods may not be appropriate in specific situations, but where they are practical; they can often be used to reduce vibration to an acceptable level.

- **Jetting:** Jetting is a pile driving aid in which a mixture of air and water is pumped through high-pressure nozzles to erode the soil adjacent to the pile to facilitate placement of the pile. Jetting can be used to bypass shallow, hard layers of soil that would generate high levels of vibration at or near the surface if an impact pile driver was used
- **Pre-drilling:** Pre-drilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving.
- **Using cast-in-place or auger cast piles:** Using cast-in-place or auger cast piles eliminates impact driving and limits vibration generation to the small amount generated by drilling, which is negligible

- **Using non-displacement piles:** Use of non-displacement piles such as H piles may reduce vibration from impact pile driving because this type of pile achieves its capacity from end bearing rather than from large friction transfer along the pile shaft
- **Using pile cushioning:** With pile cushioning, a resilient material is placed between the driving hammer and the pile to increase the period of time over which the energy from the driver is imparted to the pile. Keeping fresh, resilient cushions in the system can reduce the vibration generated by as much as a factor of 2 (Woods 1997)
- **Scheduling for specific times to minimize disturbance at nearby vibration-sensitive sites:** Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. For example, if pile driving near a residential area can be scheduled during business hours on weekdays, many people will be at work and will therefore not be affected
- **Using alternative nonimpact drivers:** Several types of proprietary pile driving systems have been designed specifically to reduce impact induced vibration by using torque and down-pressure or hydraulic static loading. These methods would be expected to significantly reduce adverse vibration effects from pile placement. The applicability of these methods depends in part on the type of soil

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2.3 Biological Environment

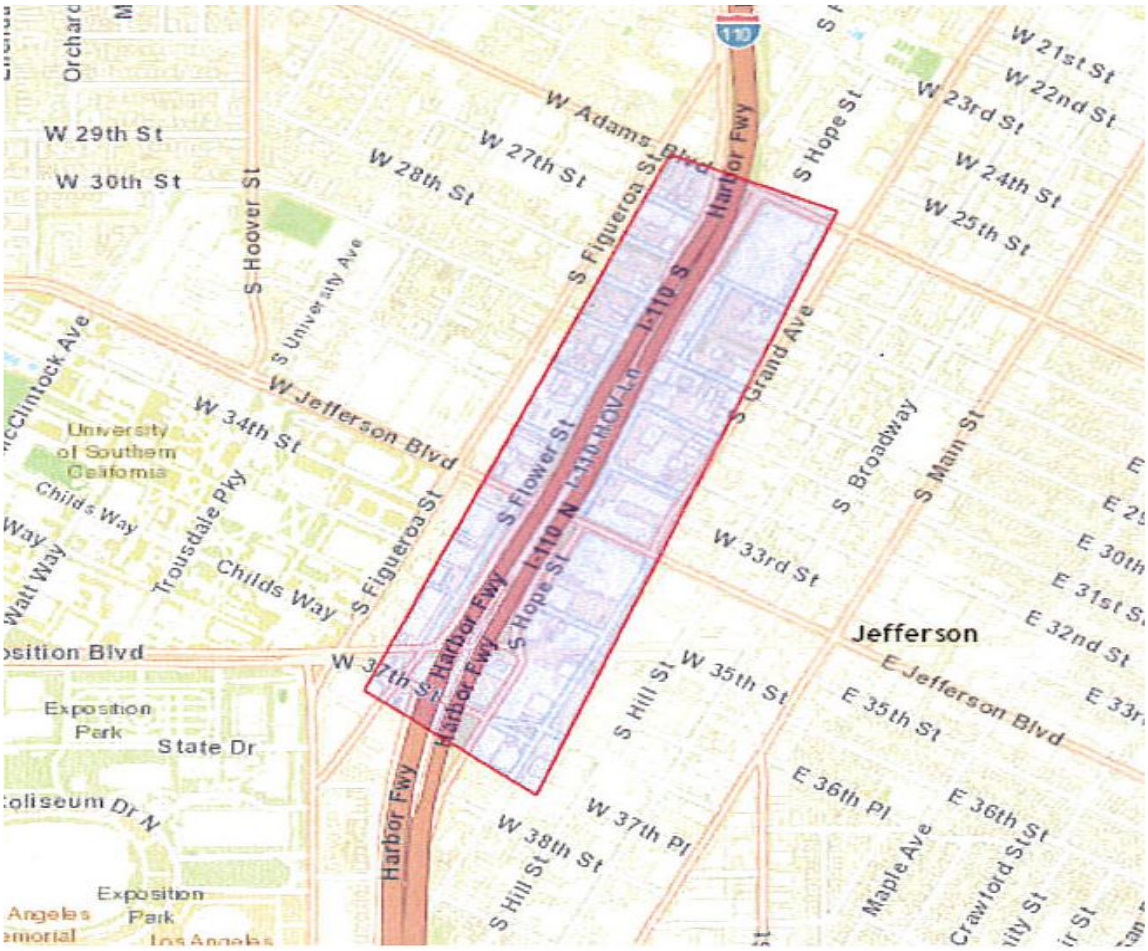
2.3.1 Natural Communities

This section of the document discusses natural communities of concern. The focus of this section is on biological communities, not individual plant or animal species. This section also includes information on wildlife corridors and habitat fragmentation if any. Wildlife corridors are areas of habitat used by wildlife for seasonal or daily migration. Habitat fragmentation involves the potential for dividing sensitive habitat and thereby lessening its biological value.

Affected Environment

According to the Natural Environment Study (October 2014), the environmental setting is completely urbanized in downtown Los Angeles. Topography is relatively flat. The only vegetation is ornamental plantings and some ruderal species associated with vacant lots. Some vegetation in the area includes eucalyptus, several palm species, pittosporum, and iceplant, among others. Animal life is very minimal, and would include the common gopher, Norway rat, American crow, and house pigeon. The rodents do attract an occasional raptor in the area. Refer to Figure 47 for biological study area map.

Figure 47: Biological Study Area Map



Source: Natural Environment Study, 2014

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative): Biological communities are not anticipated to be impacted by the proposed Build Alternative due to the location of the proposed project. Further, biological conditions are highly compromised. There are no sensitive species or habitats of concern in the project area.

No construction/operational impacts to biological communities are anticipated as a result of the Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, and/or mitigation measures are required because no impacts to biological communities are anticipated.

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2.3.2 Animal Species

Regulatory Setting

Many state and federal laws regulate impacts to wildlife. The U.S. Fish and Wildlife Service (USFWS), the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries Service) and the California Department of Fish and Wildlife (CDFW) are responsible for implementing these laws. This section discusses potential impacts and permit requirements associated with animals not listed or proposed for listing under the federal or state Endangered Species Act. All other special-status animal species are discussed here, including CDFW fully protected species and species of special concern, and USFWS or NOAA Fisheries Service candidate species.

Federal laws and regulations relevant to wildlife include the following:

- National Environmental Policy Act
- Migratory Bird Treaty Act
- Fish and Wildlife Coordination Act
- State laws and regulations relevant to wildlife include the following:
- California Environmental Quality Act
- Sections 1600 – 1603 of the California Fish and Game Code
- Sections 4150 and 4152 of the California Fish and Game Code

Affected Environment

The environmental setting is completely urbanized in downtown Los Angeles. Biological conditions are highly compromised. Animal life is very minimal, and would include the common gopher, Norway rat, American crow, and house pigeon. The rodents do attract an occasional raptor in the area.

Refer to Appendix E for a list of threatened and endangered species. No threatened or endangered species have been identified near the project limits, therefore, no adverse impacts are anticipated

Environmental Consequences

Alternative 1 (No-Build Alternative): The existing condition would remain; therefore, no impact would occur.

Alternative 2 (Build Alternative):

Potential Construction Impacts

There are no sensitive species or habitats of concern in the project area. Impacts to birds are anticipated if construction activities are completed within bird nesting season (March 1st through September 1st). If construction occurs during this time, avoidance measure BIO-1 will be implemented to avoid impacts to birds.

Potential Operational Impacts

No operational impacts to animal species is anticipated as a result of the proposed Build Alternative.

Avoidance, Minimization, and/or Mitigation Measures

Avoidance BIO-1: Avoid construction during bird nesting season, or at a minimum grub the vegetation outside the bird nesting season. If this cannot be done, then a biological survey will be required no more than 5 days in advance of grubbing for nesting birds. Further, if any bird nests are found, then a buffer of 150 feet for songbirds and 500 feet for raptors will be required until the nestlings have fledged. This is per the federal Migratory Bird Treaty Act.

2.4 Cumulative Impacts

Regulatory Setting

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of this proposed project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a period of time.

Cumulative impacts to resources in the project area may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, and disruption of migration corridors, changes in water quality, and introduction or promotion of predators. They can also contribute to potential community impacts identified for the project, such as changes in community character, traffic patterns, housing availability, and employment.

California Environmental Quality Act (CEQA) Guidelines Section 15130 describes when a cumulative impact analysis is necessary and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts under CEQA can be found in Section 15355 of the CEQA Guidelines. A definition of cumulative impacts under the National Environmental Policy Act (NEPA) can be found in 40 Code of Federal Regulations (CFR), Section 1508.7 of the Council on Environmental Quality (CEQ) Regulations.

Affected Environment

Methodology

Cumulative impacts were identified by comparing the impacts of the proposed project and other past, current, or proposed actions in the area to establish whether, in the aggregate, they could result in cumulative environmental impacts. Both direct and indirect impacts are assessed. The cumulative effects analysis focuses on those issues and resources that would be affected by the combination of stress factors on the environment and does not address in detail those topics that would not have additional environmental effects from the cumulative condition. The analysis provided in this section considered the effects of the other projects and the Build Alternative in assessing whether a particular environmental parameter would experience cumulative adverse impacts. Specific geographic boundaries for cumulative effects are determined for each environmental topic analyzed and may vary accordingly. Future actions anticipated to occur include further growth within the City and County. The growth would require continued expansion of supporting infrastructure such as roadways, commercial uses, public services, and utilities. The anticipated growth is reflected in the regionally adopted growth projections and is planned for in the City and County General Plans.

The cumulative impact analysis builds upon information derived from the direct and indirect impacts analyses. The first step in performing the cumulative impact analysis is to identify which resources to consider in the analysis. If a project will not cause direct or indirect impacts on a resource, it will not contribute to a cumulative impact on that resource. The cumulative impact analysis should focus only on: 1) those resources significantly impacted by the project; or 2) resources currently in poor or declining health or at risk even if project impacts are relatively small (less than significant). “The resources subject to a cumulative impact assessment should be determined on a case-by-case basis early in the NEPA process, generally as part of early coordination or scoping” (FHWA 2003 Guidance).

Please note that a quantification of cumulative impacts is not feasible for some impact topics and would be speculative. Therefore, much of the cumulative evaluation is a qualitative judgment regarding the combined effects of the relationship among the projects included in the Resource Study Area (RSA) for each resource. In some cases, application of the identified project mitigation and/or minimization program may reduce the cumulative impacts as well as the project impact.

As discussed previously, this project is within the South Los Angeles and Southeast Los Angeles Community Plan Areas. Regionally, development trends in the greater Los Angeles area are shifting from development of vacant lands to infill, redevelopment, and transit oriented development. Land use policies for future development within unincorporated areas are geared towards the implementation of smart growth policies, environmental management, and provision of healthy and livable communities. Transportation improvements within the greater Los Angeles area are focused on re-working the existing system and transitioning to a more transit-based system that will encourage transit-oriented development and improve area circulation and health for area residents. This section takes into consideration past, present, and reasonably foreseeable future actions, combined with the potential impacts of this proposed project. Table 33 lists potential projects within/near the South and Southeast Los Angeles Community Plan Areas that are considered in the cumulative impacts analysis.

Table 33: List of Potential Project within/near the South & Southeast Los Angeles Community Plans Areas Considered in the Cumulative Impacts Analysis

Name/Location	Jurisdiction	Proposed Uses	Status
FIGUEROA CORRIDOR BIKEWAY (MyFig Project)/Figueroa Street from 7th Street in downtown Los Angeles to 41st Street, just south of Exposition Park; 11th Street from Figueroa Street east to Broadway in the South Park neighborhood of downtown Los Angeles; and Martin Luther King Jr. Boulevard from Figueroa Street west to Vermont Avenue, on the south edge of Exposition Park.	City of Los Angeles	Seeks to transform the Figueroa Corridor into a complete, multimodal street that better serves the needs of pedestrians, bicyclists, and transit riders, while still accommodating drivers.	Completion is anticipated in Spring, 2018
UNIVERSITY OF SOUTHERN CALIFORNIA (USC) OWNED PROPERTY POTENTIAL PROJECTS/USC Campus	USC	New Academic and Administrative Buildings, New Mixed-Use University Village, create pedestrian friendly area	To be determined
G12 PROJECT/Three-acre site bounded by Twelfth and Olive streets, Pico Boulevard and Grand Avenue	Developer Sonny Astani and L&R Group	Residential complex with 640 units.	Ground breaking is yet to be determined
OLYMPIC AND BROADWAY CONDOS/955 S. Broadway	Developer Barry Shy	A 15-story condominium complex, The 184,705-square-foot structure would bring 163 housing units and eight commercial spaces to the corner of Broadway and Olympic Boulevard	No timeline for construction has been revealed
OLYMPIC AND HILL APARTMENTS/Olympic and Hill	Developer he Hanover Company	281-apartment complex, seven floors of housing along with 16,000 square feet of street-level retail	Completion is anticipated 2015
ONYX Project / Pico Boulevard at Flower and Hope streets	Developer Jade Enterprises	The first of two buildings in the complex at Pico Boulevard at Flower and Hope streets will bring 162 apartments and 13,200 square feet of retail space. The seven-story Onyx is rising on two side-by-side parking lots atop a total of 42,000 square feet of retail and commercial space.	Completion is anticipated 2017
BLOSSOM PLAZA/900 N. Broadway	Developer Forest City	Five-story Blossom Plaza will have 237 apartments (with 53 reserved for low-income residents), a 17,000-square-foot public plaza and a walkway connecting the Metro Gold Line station to Broadway in the heart of Chinatown.	Completion is anticipated in Spring of 2016

Name/Location	Jurisdiction	Proposed Uses	Status
CITY MARKET/Bounded by Ninth, San Pedro, San Julian and 12th streets,	City Market owner Peter Fleming	945 residential units, 210 hotel rooms, 225,000 square feet of retail and 295,000 square feet of creative office space. The first phase calls for transforming two aged buildings: One would hold 150 housing units and the other would be an office structure.	Completion is anticipated in 2034
FIGUEROA CENTRAL/A 4.6-acre site immediately east of Staples Center	Beijing's Oceanwide Real Estate Group.	Build the massive mixed-use Figueroa Central project on the property, with 45- and 33-story towers, 220 hotel rooms and additional retail space.	Completion is anticipated to be in 2018
METROPOLIS/The 6.33-acre Metropolis site is bounded by the I-110 Freeway and Francisco, Eighth and Ninth streets	Greenland Group	Create two towers joined by a large public plaza. One will be a 38-story building with about 300 units while the other will be a 19-story hotel with 350 rooms.	Completion is anticipated to be in 2016
REGIONAL CONNECTOR/Underground tunneling from Little Tokyo to the Financial District by way of Second Street, as well as a trench down Flower Street to Wilshire Boulevard.	Metro	Regional Connector that will connect a series of light rail lines, create three new stations, and streamline travel throughout the region.	Completion is anticipated to be in 2019
EMBASSY HOTEL AND THEATRE/849 S. Grand Ave.	Chetrit Group	183-room hotel featuring an approximately 2,000-square-foot ground-floor restaurant, a 7,600-square-foot outdoor garden, a lobby bar and a lounge.	Completion is anticipated to be in 2015
PHARMACY/Washington Blvd./Hoover St.	City of Los Angeles	New one-story 16,572 square feet retail pharmacy with 24 hour operation	To be determined

Environmental Consequences

Land Use

Resource Study Area (RSA)

RSA boundary used in the assessment of cumulative impacts involving land use is defined as the South and Southeast Los Angeles Community Plan Areas refer to Figure 5.

Existing Condition within RSA

The RSA Study Area is urbanized with little to no space for new development. Development trends are shifting from development of vacant lands to infill, redevelopment, and transit oriented development. Land use policies for future development within unincorporated areas are geared towards the implementation of smart growth policies, environmental management, and provision of healthy and livable communities. The land uses include: residential, commercial, industrial and small patches of open space. Numerous historical properties are within the RSA.

Potential Direct and/or Indirect Impacts within RSA

The proposed project would not result in any change in land use or zoning and would comply with the pertinent general plan policies. Minimal right of way will be required for the proposed project, and no displacements would occur, and relocations would not be necessary. The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including a general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project is consistent with local plans and policies and would not result in any adverse impacts, either individually or cumulatively, on land use and planning.

Cumulative Impact Potential

There is no potential for impacts on land use and planning and the community at large as a result of the proposed project. The related projects are expected to comply with environmental regulations and other local plans and policies and would likely be consistent with any land use plans. The TMP prepared for each project would take into account cumulative projects within its vicinity. Based on the lack of potential for impacts as a result of the proposed project and the small scale of the projects listed in Table 33, the proposed project would not result in any cumulatively considerable land use impacts.

Community Character and Cohesion

RSA

RSA boundary used in the assessment of cumulative impacts involving community character and cohesion is defined as the South and Southeast Los Angeles Community Plan Areas.

Existing Condition within RSA

Field surveys and discussions with local public officials and community leaders, and historical preservation organizations provided insight into the community's character and cohesiveness which confirmed a high level of community cohesion within the RSA. The community currently uses Figueroa Way as a short cut to access the surrounding community. Currently, there is no separation between vehicular traffic and bicycle traffic. There are several historical properties within the project study area (refer to Figure 31 map of historical properties near the proposed project).

Potential Direct and/or Indirect Impacts within RSA

There are positive impacts (project benefits) such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the project study area. Improved access to local business by improving circulation and safety which will encourage economic growth. Access to Figueroa Way will be limited and/or non-existent during construction to all users (pedestrians, bicyclists, public transportation users (Metro bus stop on Figueroa Way will be moved), and motorists. Further, after construction Figueroa Way will be closed to vehicular traffic, and the bus stop will be permanently moved. All users of Figueroa Way will be impacted by the proposed project, but with the incorporation of the following measures the impact is minimized (refer to section 2.1.8 in this document for details of each measure):

Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Mitigation P&B-1: Re-design Figueroa Way to encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a short cut to access the surrounding community.

Minimization BUS-1: The Metro Silver Line bus stop on Figueroa Way will be consolidated with the currently existing bus stop on Figueroa Street and 23rd St. Therefore, bus service will still be available.

Cumulative Impact Potential

The potential impacts are limited to the project study area and with the implementation of the before mentioned avoidance, minimization, and/or mitigation measures potential impacts are minimized. If other projects in the area (listed in Table 33) are under construction simultaneously this could be cumulatively considerable. The following projects may be in construction at the same time as the proposed project: USC Projects on USC campus/owned property, G-12 Project (Three-acre site bounded by Twelfth and Olive streets, Pico Blvd. and Grand Ave.), the Olympic and Broadway Condos, City Market Project (Bounded by Ninth, San Pedro, San Julian and 12th streets, and the pharmacy, which will be located on Washington Blvd. and Hoover St. All these projects will be required to implement a TMP, and consider other projects in the area, as well as follow all laws and regulations to minimize environmental impacts to the community. Therefore, cumulative impacts are not anticipated as a result of the proposed Build Alternative.

Emergency Services

RSA
The RSA for emergency services is the project study area.

Existing Condition within RSA
The existing delay, and bottleneck intersections surrounding the proposed project may negatively impact response times in the future as seen in the Traffic and Transportation section 2.1.8 of this document if Alternative 1 is chosen.

Potential Direct and/or Indirect Impacts within RSA
During construction of the project, there would be potential for direct and indirect impacts on emergency services. Closure of Figueroa Way during construction may affect emergency response times to some parts of the study area. Avoidance and minimization measures are proposed, including the preparation of a TMP and notifying local emergency services of proposed construction activities. This would ensure that emergency services have adequate information to plan detour routes. The project in the long term would benefit emergency services by reducing congestion and improving travel time refer to section 2.1.8 Traffic and Transportation for traffic data that shows improvement in travel times. After construction first responders will be able to use Figueroa Way in case of an emergency on the westerly side of the proposed elevated structure.

Cumulative Impact Potential
Construction activities for one or more of the related projects in the area could result in temporary, localized, site-specific disruptions, including partial and/or complete street and lane closures and detours. If the activities occur at the same time, this could cumulatively increase response times for emergency vehicles during construction. Potential disruptions to emergency services could be avoided through implementation of the following minimization measure T-1. The preparation of a TMP would take into consideration other projects in the area. The TMP would include provisions to notify the local fire and police stations that would potentially be affected of any planned partial or complete street closures or traffic diversions. Therefore, the cumulative effects of construction, should they occur, would be minor and temporary.

Traffic and Transportation, Bicycle and Pedestrian Facilities

RSA
The SCAG region covered under the RTP is the appropriate RSA for evaluating cumulative impacts at a regional level. For localized effects, area covered by the potential projects listed in Table 37 which fall within South and Southeast Los Angeles Community Plan Areas is considered the RSA.

Existing Condition within RSA
Currently, the traffic delay times are high and future delay times are anticipated to worsen if no action is taken (see section 2.1.8 in this document). A Metro bus stop is located on Figueroa Way. The community currently uses Figueroa Way as a short cut to access the surrounding community. Currently, there is no separation between vehicular traffic and bicycle traffic on Figueroa Way.

Potential Direct and/or Indirect Impacts within RSA

Once constructed, the project would result in a beneficial impact on regional and local traffic conditions (see section 2.1.8 Traffic and Transportation) for the results of implementing the Build Alternative. The bus stop located on Figueroa Way will be moved to Figueroa St. and 23rd St. Access to Figueroa Way by all users would be limited/non-existent during construction. After construction, Figueroa Way will be closed to vehicular traffic. With the incorporation of the following measures the impacts are minimized.

Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Mitigation P&B-1: Re-design Figueroa Way to encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a short cut to access the surrounding community.

Minimization BUS-1: The Metro Silver Line bus stop on Figueroa Way will be consolidated with the currently existing bus stop on Figueroa Street and 23rd Street. Therefore, bus service will still be available.

Cumulative Impact Potential

At the regional level, the proposed project is included in 2016 RTP. Thus the cumulative impacts from the proposed project at the regional level have been accounted for under the program Initial Study/ Environmental Assessment Report of the RTP and the proposed project would not result in cumulative impacts at the regional level.

At the local level, the proposed project would improve the operational efficiency and safety of the studied intersections discussed in section 2.1.8. Thus, the build conditions would provide an improvement in delay times at intersections analyzed versus the no-build conditions. Because the proposed project would have a beneficial impact on traffic, adverse cumulative impacts are not anticipated once the project is operational.

However, construction activities for one or more of the related projects in the area could result in temporary, localized, site-specific disruptions, including partial and/or complete street and lane closures and detours. If the activities occur at the same time, this could cumulatively increase response times for emergency vehicles during construction. Potential disruptions to emergency services could be avoided through implementation of minimization measure T-1 described in section 2.1.8. Further, the preparation of a TMP would take into consideration other projects in the area.

Cultural Resources

RSA

The RSA for cultural resources is the APE identified for the proposed project. The APE incorporates the maximum existing or proposed right-of-way and any area where ground may be disturbed by construction activities. Additionally, the APE incorporates parcels that may have potential visual and audible effects resulting from the proposed project.

Existing Condition within RSA

There are several historical properties within the APE map which include: St. John's Episcopal Church, St. John's Parish Hall, Automobile Club of Southern California, St. Vincent de Paul Church, and the Stimson House.

Potential Direct and/or Indirect Impacts within RSA

The proposed project will result in an adverse impact (visual intrusion) on one historical property (St. John's Episcopal Church) within the APE. The proposed project would not result in substantial adverse effects or significant impacts archaeological resources. With the incorporation of the following mitigation measures CR-1 through CR-3 impacts and minimization/avoidance measures CR-4 and CR-5 will be minimized.

Mitigation CR-1: Design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the West Adams community and is sensitive to the historic qualities of St. John's Episcopal Church.

Mitigation CR-2: Caltrans will create electronic content for a smartphone traveler application (The Clio or equal) describing and interpreting previously identified historic properties and historical resources nearby the flyover. Traveler application boundaries will be: the southern limit of Interstate 10 (on the north side), South Grand Avenue and I-110 (east), Martin Luther King, Jr. Boulevard (south) and South Normandie Avenue (west). The historic properties and historical resources would include but not be limited to: St. John's Episcopal Church, St. John's Episcopal Church Parish House, the Automobile Club of Southern California (2601 South Figueroa Street, 650 West Adams Boulevard, 661 West 27th Street,), St. Vincent de Paul Church (601 West Adams Boulevard), the Stimson House (2421 South Figueroa Street), University Park Historic Preservation Overlay Zone and Chester Place Historic District (various). The content will include historical narrative information, as well as historical photographs, and other documentation. This application will be available free to the public through smartphone application stores prior to the termination of this agreement.

Mitigation CR-3: Caltrans will design and implement interior car cards to be placed in the DASH shuttle buses that service the project area. The car cards will, to the extent possible, direct riders' attention to historic properties, historical resources, local landmarks and historic neighborhoods in the above geographic area. If possible the car cards will direct riders to the Clio or equal smartphone application. The interior car cards will be posted for a minimum of six non-consecutive months. A proof and final photograph of the installed card/cards will be submitted to SHPO.

Minimization CR-4: Caltrans shall submit design development plans for the area beneath the flyover to SHPO for review and comment at 60% and 90% completion. SHPO will review the design development plans to determine whether the plans conform to concepts described in paragraph A of this stipulation. SHPO will provide comments on the submittals to Caltrans within 30 calendar days of receipt. If SHPO does not comment within the time provided, Caltrans may assume that SHPO concurs and the package meets the cited objectives. Caltrans will incorporate SHPO comments into the project plans to the fullest extent. If Caltrans revises project plans in response to SHPO comments, then no further review is required for that consultation package. Should Caltrans object to incorporation of SHPO comments into consultation packages at any stage of the project, Caltrans will provide SHPO with written explanation of that objection. Objections to the plans shall be resolved in accordance with Stipulation IV.B of the MOA.

Construction activities associated with the proposed project and nearby projects could unearth unanticipated cultural resources and result in an adverse cumulative impact. Avoidance measure CR-5 will ensure that any cumulative impacts, should they occur, are minimized.

Avoidance CR-5: If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find. If human remains are discovered, State Health and Safety Code Section 7050.5 states further disturbances and activities shall stop in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to California Public Resources Code (PRC) Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC), which will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains will contact Kelly Ewing-Toledo, Senior Environmental Planner Cultural Resources Branch, so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

Construction impacts on cultural resources may include a temporary increase to noise levels during the construction period on surrounding historical properties, but will be minimized by implementing avoidance measures N-1, minimization measures N-2 through N-4, and GV-1. Potential traffic circulation issues during construction will be minimized with the implementation of minimization measure T-1. Potential increase in dirt, and dust from construction materials will be minimized by incorporating minimization measures WQ-1 through WQ-8, and minimization measures AQ-1 through AQ-16.

Avoidance N-1: Equipment Noise Control will be applied to revising old equipment and designing new equipment to meet acceptable noise levels.

- Mufflers are very effective devices which reduce the noise emanating from the intake or exhaust of an engine, compressor, or pump. The fitting of effective mufflers on all new equipment and retrofitting of mufflers on existing equipment is necessary to yield an immediate noise reduction at all types of road construction sites
- Sealed and lubricated tracks for crawler mounted equipment will lessen the sound radiated from the track assembly resulting from metal to soil and metal to metal contact. Contractors,

site engineers, and inspectors should ensure that the tracks are kept in excellent condition by periodic maintenance and lubrication
- Lowering exhaust pipe exit height closer to the ground can result in an off-site noise reduction. Barriers are more effective in attenuating noise when the noise source is closer to ground level
- General noise control technology can have substantially quieter construction equipment when manufacturers apply state-of-the-art technology to new equipment or repair old equipment to maintain original equipment noise levels

Minimization N-2: In-Use Noise Control where existing equipment is not permitted to produce noise levels in excess of specified limits.

Any equipment that produces noise levels less than the specified limits would not be affected. However, those exceeding the limit would be required to meet compliance by repair, retrofit, or replacement. New equipment with the latest noise sensitive components and noise control devices are generally quieter than older equipment, if properly maintained and inspected regularly. They should be repaired or replaced if necessary to maintain the in-use noise limit. All equipment applying the in use noise limit would achieve an immediate noise reduction if properly enforced.

Minimization N-3: Site Restrictions is an attempt to achieve noise reduction through modifying the time, place, or method of operation of a particular source. Site restrictions should be applied to achieve noise reduction through different methods, resulting in an immediate reduction of noise emitted to the community without requiring any modification to the source noise emissions. The methods include shielding with barriers for equipment and site, truck rerouting and traffic control, time scheduling, and equipment relocation. The effectiveness of each method depends on the type of construction involved and the site characteristics.

Shielding with barriers should be implemented at an early stage of a project to reduce construction equipment noise. The placement of barriers must be carefully considered to reduce limitation of site access. Barriers may be natural or man-made, such as excess land fill used as a temporary berm strategically placed to act as a barrier.

- Efficient rerouting of trucks and control of traffic activity on construction site will reduce noise due to vehicle idling, gear shifting and accelerating under load. Planning proper traffic control will result in efficient workflow and reduce noise levels. In addition, rerouting trucks does not reduce noise levels but transfers noise to other areas that are less sensitive to noise
- Time scheduling of activities should be implemented to minimize noise impact on exposed areas. Local activity patterns and surrounding land uses must be considered in establishing site curfews. However, limiting working hours can decrease productivity. Sequencing the use of equipment with relatively low noise levels versus with relatively high noise levels during noise sensitive periods is an effective noise control measure
- Equipment location should be as far from noise sensitive land use areas as possible. The contractor should substitute quieter equipment or use quieter construction processes at or near noise sensitive areas

Minimization N-4: Personal Training of operators and supervisors is needed to become more aware of the construction site noise problems.

Educating contractors and their employees to be sensitive to noise impact problems and noise control methods. This may be one of the most cost-effective ways to help operators and supervisors become more aware of the construction site noise problem and to implement the various methods of improving the conditions. A training program for equipment operators is recommended to instruct them in methods of operating their equipment to minimize environmental noise. Many training programs are presently given on the subject of job safety. This can be extended to include the impact due to noise and of abatement.

Minimization GV-1: As recommended in the Noise and Vibration Manual (September 2013), impact pile driving can be the most significant source of vibration at construction sites. The principal means of reducing vibration from impact pile driving are listed below. Some of these methods may not be appropriate in specific situations, but where they are practical; they can often be used to reduce vibration to an acceptable level.

- **Jetting:** Jetting is a pile driving aid in which a mixture of air and water is pumped through high-pressure nozzles to erode the soil adjacent to the pile to facilitate placement of the pile. Jetting can be used to bypass shallow, hard layers of soil that would generate high levels of vibration at or near the surface if an impact pile driver was used
- **Pre-drilling:** Pre-drilling a hole for a pile can be used to place the pile at or near its ultimate depth, thereby eliminating most or all impact driving.
- **Using cast-in-place or auger cast piles:** Using cast-in-place or auger cast piles eliminates impact driving and limits vibration generation to the small amount generated by drilling, which is negligible
- **Using non-displacement piles:** Use of non-displacement piles such as H piles may reduce vibration from impact pile driving because this type of pile achieves its capacity from end bearing rather than from large friction transfer along the pile shaft
- **Using pile cushioning:** With pile cushioning, a resilient material is placed between the driving hammer and the pile to increase the period of time over which the energy from the driver is imparted to the pile. Keeping fresh, resilient cushions in the system can reduce the vibration generated by as much as a factor of 2 (Woods 1997)
- **Scheduling for specific times to minimize disturbance at nearby vibration-sensitive sites:** Adverse effects can be avoided if pile driving is not scheduled for times at which vibration could disturb equipment or people. For example, if pile driving near a residential area can be scheduled during business hours on weekdays, many people will be at work and will therefore not be affected
- **Using alternative nonimpact drivers:** Several types of proprietary pile driving systems have been designed specifically to reduce impact induced vibration by using torque and down-pressure or hydraulic static loading. These methods would be expected to significantly reduce adverse vibration effects from pile placement. The applicability of these methods depends in part on the type of soil

Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be

provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Minimization WQ-1: Storm drain inlet protection will be deployed throughout the project and the roadway should be swept regularly to minimize dirt and dust.

Minimization WQ-2: Concrete wastes will be managed through the use of concrete washout facilities.

Minimization WQ-3: Temporary silt fence shall be utilized to protect existing vegetation. Location of the temporary fencing shall be shown on the project plans.

Minimization WQ-4: Various waste management, materials handling, and other housekeeping BMPs will be used throughout the duration of the project.

Minimization WQ-5: Construction sequencing will be scheduled to minimize storm water quality impacts.

Minimization WQ-6: A Water Pollution Control Plan will be prepared, and implemented during the construction stage.

Minimization WQ-7: Comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) (i.e. Construction General Permit).

Minimization WQ-8: Comply with the provisions identified in the NPDES Statewide Storm Water Permit Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003).

Minimization AQ-1: Compliance with Caltrans' Standard Specifications in Section 14 (2010) will be required.

Minimization AQ-2: Section 14-9.01 specifically requires compliance with all applicable laws and regulations related to air quality, including SCAQMD rules and regulations and local ordinances.

Minimization AQ-3: 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.

Minimization AQ-4: 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 as required by the SCAQMD.

Minimization AQ-5: Spread soil binder on any unpaved roads used for construction purposes, and all project construction parking areas.

Minimization AQ-6: Wash off trucks as they leave the R/W as necessary to control fugitive dust emissions.

Minimization AQ-7: 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.

Minimization AQ-8: Develop a dust control plan documenting sprinkling, temporary paving, speed limits, and expedited re-vegetation of disturbed slopes as needed to minimize construction impacts to existing communities.

Minimization AQ-9: Locate equipment and materials storage sites at least 500 feet from the sensitive receptors. Keep construction areas clean and orderly.

Minimization AQ-10: Establish environmentally sensitive areas (ESAs) or their equivalent at least 500 feet away from sensitive air receptors within which construction activities such as extended idling, material storage, and equipment maintenance, would be prohibited, to the extent feasible.

Minimization AQ-11: 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.

Minimization AQ-12: 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.

Minimization AQ-13: Promptly and regularly remove dust and mud that are deposited on paved, public roads due to construction activity and traffic to decrease particulate matter.

Avoidance AQ-14: 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.

Minimization AQ-15: Install mulch or plant vegetation as soon as practical after grading to reduce windblown particulates 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.

Avoidance AQ-16: While unlikely, if naturally occurring asbestos, serpentine, or ultramafic rock is discovered during grading operations Section 93105, Title 17 of the California Code of Regulations requires notification to the SCAQMD by the next business day and implementation of the following measures within 24 hours:

- Unpaved areas subject to vehicle traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos
- The speed of any vehicles and equipment traveling across unpaved areas must be no more than fifteen (15) miles per hour unless the road surface and surrounding area is sufficiently stabilized to prevent vehicles and equipment traveling more than 15 miles per hour from emitting dust that is visible crossing the project boundaries
- Storage piles and disturbed areas not subject to vehicular traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos
- Activities must be conducted so that no track-out from any road construction project is visible on any paved roadway open to the public

Cumulative Impact Potential

Impacts on historical resources tend to be site specific and are assessed on a site-by-site basis. Where resources exist, implementation of cumulative development in the region would represent an incremental adverse impact to historical resources. Given the location of the projects listed in Table 33, cultural resources in close proximity could be adversely affected. Implementation of cumulative development could represent an incremental adverse impact on historic resources. Each related project will be required to comply with the requirements of applicable State and Federal laws to assure that potential impacts are minimized to the fullest extent possible.

The proposed project would result in an adverse impact on two historical property (St. John's Episcopal Church and St. John's Parish Hall) within the APE, but with the incorporation the proper mitigation measures this impact is less than significant CR-1 through CR-3, minimization /avoidance measure CR-4, and CR-5. Potential construction impacts would be minimized with the incorporation of avoidance measure N-1, minimization measures N-2 through N-4, GV-1, T-1, WQ-1 through WQ-8, and AQ-1 through AQ-16.

Nearby projects would implement similar mitigation measures to minimize impacts on cultural resources. Thus, cumulative impacts from the proposed project would not be substantially adverse. Therefore, the contribution of the project on impacts to cultural resources in the area would not be cumulatively considerable.

Water Quality and Storm Water Runoff

RSA

The RSA for water quality and storm water runoff is the watershed.

Existing Condition within RSA

The Los Angeles Regional Water Quality Control Board Region 4 (LARWQCB) has jurisdiction within the project limits. The nearest water bodies are the Ballona Creek and the Los Angeles River Reach 2 (Carson to Figueroa Street). The following are pollutants of concern in both water bodies: coliform bacteria, oil, ammonia, cooper, lead, nutrients (algae), trash cadmium (sediment), cyanide, toxicity, viruses (enteric) selenium, and zinc. The project limits are within the Ballona Creek Watershed and the hydrologic area is interior Santa Monica Bay, Hydrologic Sub Area is Wilshire.

Potential Direct and/or Indirect Impacts within RSA

Excessive stream and channel erosion may occur if runoff volumes and rates increase as a result of construction activities. Standard Caltrans BMPs, as listed in the Statewide Storm water Quality Practice Guidelines and minimization measure WQ-1 through WQ-6, would be incorporated to reduce and avoid water quality impacts. In addition, the project may result in moderate alterations to the surrounding surface drainage conditions. The BMPs required under the SWPPP would be implemented to prevent soil erosion and the discharge of other construction related pollutants that could contaminate nearby water resources. By incorporating accepted engineering practices and BMPs, impacts on the water quality of surface or ground waters during construction or operation would be minimized.

Minimization WQ-1: Storm drain inlet protection will be deployed throughout the project and the roadway should be swept regularly to minimize dirt and dust.

Minimization WQ-2: Concrete wastes will be managed through the use of concrete washout facilities.

Minimization WQ-3: Temporary silt fence shall be utilized to protect existing vegetation. Location of the temporary fencing shall be shown on the project plans.

Minimization WQ-4: Various waste management, materials handling, and other housekeeping BMPs will be used throughout the duration of the project.

Minimization WQ-5: Construction sequencing will be scheduled to minimize storm water quality impacts.

Minimization WQ-6: A Water Pollution Control Plan will be prepared, and implemented during the construction stage.

Minimization WQ-7: Comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) (i.e. Construction General Permit).

Minimization WQ-8: Comply with the provisions identified in the NPDES Statewide Storm Water Permit Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003).

Cumulative Impact Potential

The proposed project and other nearby projects would comply with BMPs and accepted engineering practices; therefore, the potential for the project to contribute to any cumulatively considerable impacts would be low.

Geology, Soils, Seismicity, and Topography

RSA

The RSA for geology and soils includes the project study area. Although, for seismicity, the entire fault zone is the RSA.

Existing Condition within RSA

The area within the project limits have been mapped as surficial sediments consisting mainly of alluvial gravel, sand and clay deposits with some cobbles. The inter-bedded sand and gravel layers generally range from dense to very dense. The project is located in a seismically active area and the Puente Hills Blind Thrust System is the closest to the site with a Maximum Magnitude of 7.3 along this fault system. Deterministic site parameters obtained using the EQFAULT-Version 3.0 (T. Blake, 2004) computer program for the deterministic prediction of peak acceleration from digitized California Fault System indicates that the Maximum Earthquake Magnitude (Mw) expected at the site could be of 7.1. There are no known earthquake faults crossing the project.

Potential Direct and/or Indirect Impacts within RSA

It was found that the potential for ground rupture is non-existing to very low at the site. In addition, based on a regional study conducted by the U.S. Geological Survey (1985), the relative liquefaction susceptibility along these project limits is considered to be low to very low. A 1999 Seismic Hazard Map - Hollywood Quadrangle issued by the Department of Conservation California Geological Survey shows that there is not a potential for liquefaction within the project limits.

Groundwater may be impacted by the construction of this project this will be determined during the PS&E Stage of this project. Groundwater may be impacted depending on the depth of the bents, but with the incorporation in GT-1 impacts will be minimized which is described below:
Minimization GT-1: If the build alternative is selected, a site-specific geotechnical investigation shall be conducted prior to the detailed design phase. This investigation will determine the depth of the existing groundwater and provide recommendations for avoidance, minimization, and/or mitigation measures, if any, as appropriate.
Some construction activities could expose soils to temporary erosion; however, this temporary erosion could be reduced by implementing National Pollutant Discharge Elimination System Permit and BMPs during project construction.

Cumulative Impact Potential

Any potential geologic hazards associated with the Project are site-specific and would not represent a cumulative impact. Implementation of the Project and other projects nearby projects listed in Table 33 would cumulatively increase the number of structures and people exposed to geologic- and seismic-related hazards. Caltrans seismic design criteria and other applicable guidelines will be followed. As long as Project design and construction is consistent with proper engineering practices and meets all laws and regulations applicable to the project, then seismic and regional geologic hazards would not be considered cumulatively considerable and would be minimized.

Hazardous Waste and Materials

RSA

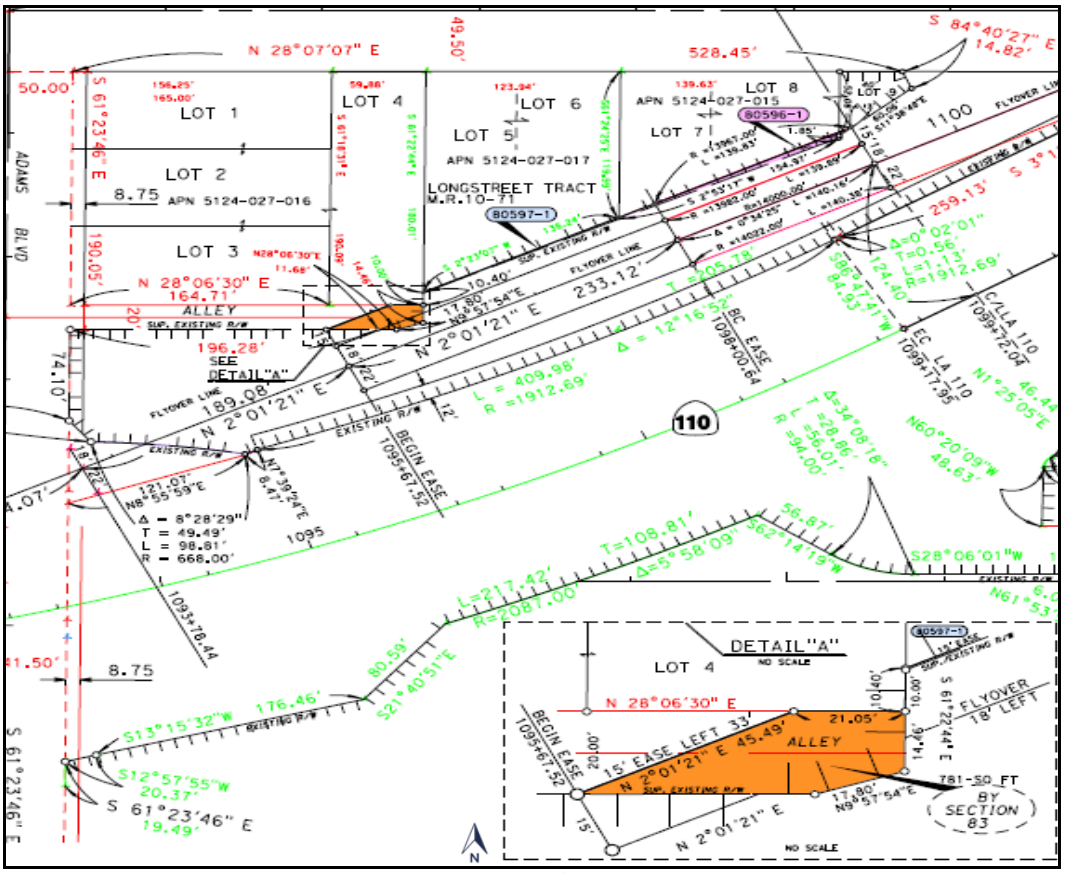
The RSA for hazardous waste and materials is the "subject property" area, which are the parcels that may require partial or full right-of-way acquisitions, and potential temporary easements the alley highlighted in orange in Figure 48 within the project study area.

According to Caltrans Right of Way Division and Caltrans Design, approximately 3 feet will be needed from two parcels to ensure sufficient space for maintenance, ingress/egress, access control, and setback purposes as well as emergency services access. The two parcels are businesses in a strip mall near the proposed project. Businesses will not be impacted by the acquisition of approximately a 3 foot sliver from the back of the properties. Therefore, the following parcels will be acquired for the proposed Build Alternative:

- Parcel # 80596-1 (APN #5124-027-015)
- Parcel # 80597-1 (APN #5124-027-017)

No relocations are anticipated as a result of the proposed Build Alternative. With the incorporation of minimization measure HW-6, potential impacts will be minimized.

Figure 48: Parcels and Potential Temporary Easements Map



Source: Caltrans Right of Way Map (2014)

Existing Condition within RSA

One reported Leaking Underground Storage Tank (LUST) site, Mobile located at 2620 Figueroa St. This facility reported groundwater contamination with gasoline. The Responsible Party (RP) stated their investigation and quarterly monitoring program since January 2003 and subsequently received a Closure/No Further Action (NFA) letter issued by the Los Angeles Regional Water Quality Control Board on September 16, 2006.

Potential Direct and/or Indirect Impacts within RSA

A Phase I ESA will be required for the required parcels. The purpose of the ESA is to recognize environmental conditions in connection with the parcels. A subsequent Phase II Site Investigation will also be required to evaluate and determine the extent/degree of contaminations on the parcels prior to acquisition. With implementation of a soil mitigation plan, an aerially deposited lead survey, and an inspection of properties to be acquired per Department of Toxic Substances Control requirements, and minimization measures HW-1 through HW-7 (described below) any potential impacts would be minimized.

Minimization HW-1: An Asbestos Containing Material (ACM) Survey will be performed by a certified Asbestos Consultant (CAC) and Certified Lead Inspector (CLI). This allow the contractor to apply for a National Emission Standards for Hazardous Air Pollutants (NESHAP) notification/permit with South Coast Air Quality Management (SCAQMD) prior to bridge demolition work.

Minimization HW-2: The development of a project-specific Lead Compliance Plan (LCP) and training program to ensure proper health and safety measures are implemented and complied prior to start of the removal operation will be required. Per Caltrans Standard Special Provisions (SSPs) a project-specific Lead Compliance Plan will be required prior to the minor soil disturbance, major soil disturbance (requires LCP and Excavation and Transportation Plan (ETP), removal of existing Yellow/White Thermoplastic Traffic Stripe and pavement marking (requires LCP and Debris Removal, Containment, and Disposal Work Plan), and non-aerially deposited lead soil disturbance (requires a Health and Safety Plan (HaSP) and a Hazardous Material/Waste Management Plan (HMP) at the project site.

Minimization HW-3: A TWW disposal health and safety plan will be prepared.

Minimization HW-4: A Debris Containment and Disposal Work Plan will be prepared.

Minimization HW-5: Removal of yellow/white thermoplastic traffic stripes and pavement marking material shall be properly collected, stored, transported, and disposed of in accordance with State and Federal guidelines.

Minimization HW-6: If the proposed Build Alternative is selected, then a Phase I Environmental Site Assessment (ESA) and a Phase II Site Investigation (SI) will be prepared. The Phase II Site Investigation will be performed on existing corridor and new parcels to be acquired for the project. The purpose of the ESA is to recognize environmental conditions in connection with the parcels. The Phase II Site Investigation will evaluate and determine the extent/degree of contaminations on the Parcels prior to acquisition. The objective of the Site Investigation is to characterize/evaluate both soil and groundwater condition.

Avoidance HW-7: A comprehensive ADL site investigation will be performed in Plans Specifications and Estimates phase of the project in order to evaluate the extent of ADL contamination and to assist in evaluation of applicable ADL soil management during construction.

Cumulative Impact Potential

The project in combination with the related projects identified in Table 33, has the potential to increase the use, storage, transport, and/or accidental release of hazardous materials during construction and operation. Specifically, any related projects that are either located on listed hazardous materials site, involve demolition of structure that may contain hazardous materials, or propose the use of hazardous materials in their operation could potentially combine with the impacts of the Project. Each of the related projects would require evaluation for potential threats to public safety related to hazards and hazardous materials. Hazardous materials and risk of upset conditions tend to be site specific. Further, the applicants for each of the related projects would be required to follow Local, State, and Federal laws regarding hazardous materials and other hazards. In general prior to the start of construction, all necessary investigations would be conducted, and remediation would be undertaken if contaminated soil or material are found. The potential impacts of the project would be minimized with the incorporation of HW-1 through HW-7; therefore, cumulative impacts would be minimized. Consequently, cumulative impacts are not anticipated.

Air Quality

RSA

The proposed project is located in the South Coast Air Basin (Basin). The Basin is the appropriate RSA for evaluating cumulative impacts at a regional level. For localized construction effects, the project study area is considered the RSA.

Existing Condition within RSA

In the Basin, high concentrations of ozone are normally recorded during the late spring and summer months, when more intense sunlight drives enhanced photochemical reactions. In contrast, higher concentrations of carbon monoxide are generally recorded in late fall and winter, when nighttime radiation inversions trap the emissions at the surface. High Inhalable Particulate Matter (PM_{10}) and ($PM_{2.5}$) concentrations can occur throughout the year, but occur most frequently in fall and winter in the Basin.

Potential Direct and/or Indirect Impacts within RSA

During construction, the proposed project would be subject to SCAQMD Rule 403 (Fugitive Dust), which requires best available fugitive dust control measures to be incorporated into construction practices. Construction impacts of the proposed project were found to be less than significant. The proposed project would not result in adverse operational emissions impacts when compared with the future no-build conditions. Rather, implementation of the proposed project would reduce pollution levels and result in a regional air quality benefit.

Cumulative Impact Potential

Since none of the projects listed in Table 33 within the project study area would be constructed at the same time as the proposed project, there would be no localized cumulative construction impacts. Additionally, for region-wide emissions, SCAQMD strategies and compliance with SCAQMD rules would mitigate the cumulative air quality impacts of the proposed project and other related projects and development in the Basin. The proposed project would not result in substantially adverse cumulative air quality impacts.

Noise and Vibration

RSA

The RSA for noise and vibration is defined as the project study area which includes surrounding properties along the alignment that may be affected by noise during construction and operation of the project.

Existing Condition within RSA

The existing ambient noise levels measured were between 63 and 67 decibels. Refer to Table 32 for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Table 33 for a summary of background noise measurements which is less than 55 dBA for both locations, and Table 34 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24- hour duration.

Potential Direct and/or Indirect Impacts within RSA

The proposed project would not result in significant noise impacts or adverse effects. Construction would be conducted in accordance with Caltrans' Standard Specifications, and applicable local noise standards. After construction noise levels will be similar to the existing with a slight increase at a few locations (refer to section 2.2.5 Noise and Vibration in this document). Vibration impacts are not anticipated as a result of the proposed Build Alternative due to the distance of the construction site and sensitive receptors, and with the incorporation of GV-1 minimization measure will ensure that sensitive receptors are not impacted by ground vibration as a result of the proposed project.

Cumulative Impact Potential

Cumulative noise impacts would occur as a result of potential additional construction activity taking place within the Project Study Area, as well as increased vehicle traffic generated by cumulative development. After construction, noise levels would result in a slight increase in a few locations (see section 2.2.5 Noise and Vibration of this document) from the existing noise levels, but this increase would not be substantially adverse. Construction activities for the proposed project and projects listed in Table 33 would be carried out in accordance with municipal codes and Caltrans guidelines, where applicable, thereby ensuring that noise impacts from construction activities would not be significant. Thus, there would not be a substantially adverse or significant cumulative impact.

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Chapter 3 California Environmental Quality Act (CEQA) Evaluation

The proposed project is a joint project by the California Department of Transportation (Department) and the Federal Highway Administration (FHWA) and is subject to state and federal environmental review requirements. Project documentation, therefore, has been prepared in compliance with both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). FHWA's responsibility for environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 United States Code Section 327 (23 USC 327) and the Memorandum of Understanding dated December 23, 2016 and executed by FHWA and Caltrans. The Department is the lead agency under CEQA and NEPA.

One of the primary differences between NEPA and CEQA is the way significance is determined. Under NEPA, significance is used to determine whether an EIS, or a lower level of documentation, will be required. NEPA requires that an EIS be prepared when the proposed federal action (project) as a whole has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA. Under NEPA, once a decision is made regarding the need for an EIS, it is the magnitude of the impact that is evaluated and no judgment of its individual significance is deemed important for the text. NEPA does not require that a determination of significant impacts be stated in the environmental documents.

CEQA, on the other hand, does require the Department to identify each "significant effect on the environment" resulting from the project and ways to mitigate each significant effect. If the project may have a significant effect on any environmental resource, then an EIR must be prepared. Each and every significant effect on the environment must be disclosed in the EIR and mitigated if feasible. In addition, the CEQA Guidelines list a number of "mandatory findings of significance," which also require the preparation of an EIR. There are no types of actions under NEPA that parallel the findings of mandatory significance of CEQA. This chapter discusses the effects of this project and CEQA significance.

There will be a less than significant impact with mitigation to cultural resources as a result of the proposed project. Mitigation measures will substantially reduce the environmental effects. Mitigation measures are listed below:

Mitigation CR-1: Design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the West Adams community and is sensitive to the historic qualities of St. John's Episcopal Church.

Mitigation CR-2: Caltrans will create electronic content for a smartphone traveler application (The Clio or equal) that describes and interprets previously identified historic properties and historical resources nearby the flyover. Traveler application boundaries will be: the southern limit of Interstate 10 (on the north side), South Grand Avenue and I-110 (east), Martin Luther King, Jr. Boulevard (south) and South Normandie Avenue (west). Those historic properties and historical resources would include but not be limited to: St. John's Episcopal Church, St. John's Episcopal Church Parish House, the Automobile Club of Southern California (2601 South Figueroa Street, 650 West Adams Boulevard, 661 West 27th Street,), St. Vincent de Paul Church (601 West Adams Boulevard), the Stimson House (2421 South Figueroa Street), University Park Historic Preservation Overlay Zone and Chester Place Historic District (various). The content will include historical narrative information, as well as historical photographs, and other documentation. This application will be available free to the public through smartphone application stores prior to the termination of this agreement.

Mitigation CR-3: Caltrans will design and implement interior car cards to be placed in the DASH shuttle buses that service the project area. The car cards will, to the extent possible, direct riders' attention to historic properties, historical resources, local landmarks and historic neighborhoods in the above geographic area. If possible the car cards will direct riders to the Clio or equal smartphone application. The interior car cards will be posted for a minimum of six non-consecutive months. A proof and final photograph of the installed card/cards will be submitted to SHPO.

California Environmental Quality Act Checklist

07-LA-110	**20.10/20.92**	**27800**
Dist.-Co.-Rte.	P.M/P.M.	E.A.

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

	Potentially Significant Impact	Less Than Significant with Mitigation	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?	☐	☐	☐	☒
II. AGRICULTURE 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 the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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))?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
IV. BIOLOGICAL RESOURCES: Would the project:				
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	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?	☐	☐	☐	☒
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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?	Caltrans has used the best available information based to the extent possible on scientific and factual information, to describe, calculate, or estimate the amount of greenhouse gas emissions that may occur related to this project. The analysis included in the climate change section of this document provides the public and decision-makers as much information about the project as possible. It is Caltrans' determination that in the absence of statewide-adopted thresholds or GHG emissions limits, it is too speculative to make a significance determination regarding an individual project's direct and indirect impacts with respect to global climate change. Caltrans remains committed to implementing measures to reduce the potential effects of the project. These measures are outlined in the climate change section of the environmental document.

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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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	☐	☐	☐	☒
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?	☐	☐	☐	☒
If the No-Build Alternative is chosen, than mitigation measure CONS-1 will be required.				
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
) 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?	☐	☐	☐	☒

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?	☐	☐	☐	☒

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?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
XVI. TRANSPORTATION/TRAFFIC: Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
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) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
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?	☐	☐	☐	☒
	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

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, substantially 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?	☐	☒	☐	☐

Climate Change

Climate change is analyzed at the end of this chapter. Neither the United States Environmental Protection Agency (U.S. EPA) nor Federal Highway Administration (FHWA) has issued explicit guidance or methods to conduct project-level greenhouse gas analysis. As stated on FHWA's climate change website (http://www.fhwa.dot.gov/hep/climate/index.htm), climate change considerations should be integrated throughout the transportation decision-making process–from planning through project development and delivery. Addressing climate change mitigation and adaptation up front in the planning process will aid decision-making and improve efficiency at the program level, and will inform the analysis and stewardship needs of project-level decision-making. Climate change considerations can easily be integrated into many planning factors, such as supporting economic vitality and global efficiency, increasing safety and mobility, enhancing the environment, promoting energy conservation, and improving the quality of life. Because there have been more requirements set forth in California legislation and executive orders on climate change, the issue is addressed in a separate California Environmental Quality Act (CEQA) discussion at the end of this chapter and may be used to inform the National Environmental Policy Act (NEPA) decision. The four strategies set forth by FHWA to lessen climate change impacts do correlate with efforts that the State has undertaken and is undertaking to deal with transportation and climate change; the strategies include improved transportation system efficiency, cleaner fuels, cleaner vehicles, and reduction in the growth of vehicle hours travelled.

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to greenhouse gas (GHG) emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change (IPCC) by the United Nations and World Meteorological Organization in 1988 has led to increased efforts devoted to GHG emissions reduction and climate change research and policy. These efforts are primarily concerned with the emissions of GHGs generated by human activity including carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF6), HFC-23 (fluoroform), HFC-134a (s, s, s, 2-tetrafluoroethane), and HFC-152a (difluoroethane).

In the U.S., the main source of GHG emissions is electricity generation, followed by transportation. In California, however, transportation sources (including passenger cars, light-duty trucks, other trucks, buses, and motorcycles make up the largest source of GHG-emitting sources. The dominant GHG emitted is CO2, mostly from fossil fuel combustion.

There are typically two terms used when discussing the impacts of climate change: "Greenhouse Gas Mitigation" and "Adaptation." "Greenhouse Gas Mitigation" is a term for reducing GHG emissions to reduce or "mitigate" the impacts of climate change. "Adaptation" refers to the effort of planning for and adapting to impacts resulting from climate change (such as adjusting transportation design standards to withstand more intense storms and higher sea levels).

There are four primary strategies for reducing GHG emissions from transportation sources: 1) improving the transportation system and operational efficiencies, 2) reducing travel activity, 3)

transitioning to lower GHG-emitting fuels, and 4) improving vehicle technologies/efficiency. To be most effective, all four strategies should be pursued cooperatively.

Regulatory Setting

State

With the passage of several pieces of legislation including State Senate and Assembly bills and Executive Orders, California launched an innovative and proactive approach to dealing with GHG emissions and climate change.

Assembly Bill 1493 (AB 1493), Pavley, Vehicular Emissions: Greenhouse Gases, 2002: This bill requires the California Air Resources Board (ARB) to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with the 2009-model year.

Executive Order (EO) S-3-05 (June 1, 2005): The goal of this EO is to reduce California's GHG emissions to 1) year 2000 levels by 2010, 2) year 1990 levels by 2020, and 3) 80 percent below the year 1990 levels by 2050. In 2006, this goal was further reinforced with the passage of Assembly Bill 32.

Assembly Bill 32 (AB 32), Núñez and Pavley, The Global Warming Solutions Act of 2006: AB 32 sets the same overall GHG emissions reduction goals as outlined in EO S-3-05, while further mandating that ARB create a scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases."

Executive Order S-20-06 (October 18, 2006): This order establishes the responsibilities and roles of the Secretary of the California Environmental Protection Agency (Cal/EPA) and state agencies with regard to climate change.

Executive Order S-01-07 (January 18, 2007): This order set forth the low carbon fuel standard for California. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by 2020.

Senate Bill 97 (SB 97) Chapter 185, 2007, Greenhouse Gas Emissions: This bill required the Governor's Office of Planning and Research (OPR) to develop recommended amendments to the California Environmental Quality Act (CEQA) Guidelines for addressing GHG emissions. The amendments became effective on March 18, 2010.

Senate Bill 375 (SB 375), Chapter 728, 2008, Sustainable Communities and Climate Protection: This bill requires the California Air Resources Board (CARB) to set regional emissions reduction targets from passenger vehicles. The Metropolitan Planning Organization (MPO) for each region must then develop a "Sustainable Communities Strategy" (SCS) that integrates transportation, land-use, and housing policies to plan for the achievement of the emissions target for their region.

Senate Bill 391 (SB 391) Chapter 585, 2009 California Transportation Plan: This bill requires the State's long-range transportation plan to meet California's climate change goals under AB 32.

Federal

Although climate change and GHG reduction are a concern at the federal level, currently no regulations or legislation have been enacted specifically addressing GHG emissions reductions and climate change at the project level. Neither the United States Environmental Protection Agency (U.S. EPA) nor the Federal Highway Administration (FHWA) has issued explicit guidance or methods to conduct project-level GHG analysis.[21] FHWA supports the approach that climate change considerations should be integrated throughout the transportation decision-making process– from planning through project development and delivery. Addressing climate change mitigation and adaptation up front in the planning process will assist in decision-making and improve efficiency at the program level, and will inform the analysis and stewardship needs of project-level decision-making. Climate change considerations can be integrated into many planning factors, such as supporting economic vitality and global efficiency, increasing safety and mobility, enhancing the environment, promoting energy conservation, and improving the quality of life.

The four strategies outlined by FHWA to lessen climate change impacts correlate with efforts that the state is undertaking to deal with transportation and climate change; these strategies include improved transportation system efficiency, cleaner fuels, cleaner vehicles, and a reduction in travel activity.

Climate change and its associated effects are also being addressed through various efforts at the federal level to improve fuel economy and energy efficiency, such as the "National Clean Car Program" and EO 13514 - *Federal Leadership in Environmental, Energy and Economic Performance*.

Executive Order 13514 (October 5, 2009): This order is focused on reducing greenhouse gases internally in federal agency missions, programs and operations, but also directs federal agencies to participate in the Interagency Climate Change Adaptation Task Force, which is engaged in developing a national strategy for adaptation to climate change.

U.S. EPA's authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six greenhouse gases constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Act and EPA's assessment of the scientific evidence that form the basis for EPA's regulatory actions. U.S. EPA in conjunction with NHTSA issued the first of a series of GHG emission standards for new cars and light-duty vehicles in April 2010.[22]

The U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) are taking coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. These next steps include

[21] To date, no national standards have been established regarding mobile source GHGs, nor has U.S. EPA established any ambient standards, criteria or thresholds for GHGs resulting from mobile sources.
[22] http://www.c2es.org/federal/executive/epa/greenhouse-gas-regulation-faq

developing the first-ever GHG regulations for heavy-duty engines and vehicles, as well as additional light-duty vehicle GHG regulations.

The final combined standards that made up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The standards implemented by this program are expected to reduce GHG emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016).

On August 28, 2012, U.S. EPA and NHTSA issued a joint Final Rulemaking to extend the National Program for fuel economy standards to model year 2017 through 2025 passenger vehicles. Over the lifetime of the model year 2017-2025 standards this program is projected to save approximately four billion barrels of oil and two billion metric tons of GHG emissions.

The complementary U.S. EPA and NHTSA standards that make up the Heavy-Duty National Program apply to combination tractors (semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles (including buses and refuse or utility trucks). Together, these standards will cut greenhouse gas emissions and domestic oil use significantly. This program responds to President Barack Obama's 2010 request to jointly establish greenhouse gas emissions and fuel efficiency standards for the medium- and heavy-duty highway vehicle sector. The agencies estimate that the combined standards will reduce CO2 emissions by about 270 million metric tons and save about 530 million barrels of oil over the life of model year 2014 to 2018 heavy duty vehicles.

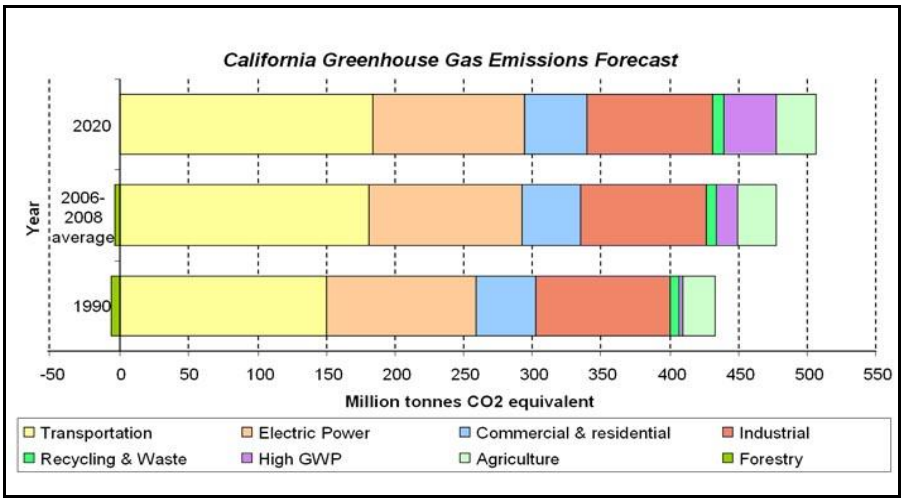
Project Analysis

An individual project does not generate enough GHG emissions to significantly influence global climate change. Rather, global climate change is a cumulative impact. This means that a project may contribute to a potential impact through its *incremental* change in emissions when combined with the contributions of all other sources of GHG.[23] In assessing cumulative impacts, it must be determined if a project's incremental effect is "cumulatively considerable" (CEQA Guidelines Sections 15064(h)(1) and 15130). To make this determination, the incremental impacts of the project must be compared with the effects of past, current, and probable future projects. To gather sufficient information on a global scale of all past, current, and future projects to make this determination is a difficult, if not impossible, task.

The AB 32 Scoping Plan mandated by AB 32 includes the main strategies California will use to reduce GHG emissions. As part of its supporting documentation for the Draft Scoping Plan, the ARB released the GHG inventory for California (forecast last updated: October 28, 2010). The forecast is an estimate of the emissions expected to occur in 2020 if none of the foreseeable measures included in the Scoping Plan were implemented. The base year used for forecasting emissions is the average of statewide emissions in the GHG inventory for 2006, 2007, and 2008. Please see Figure 49 for California Greenhouse Gas Forecasts which shows transportation being the biggest contributor to Greenhouse Gas emissions.

[23] This approach is supported by the AEP: *Recommendations by the Association of Environmental Professionals on How to Analyze GHG Emissions and Global Climate Change in CEQA Documents* (March 5, 2007), as well as the South Coast Air Quality Management District (Chapter 6: The CEQA Guide, April 2011) and the U.S. Forest Service (Climate Change Considerations in Project Level NEPA Analysis, July 13, 2009).

Figure 49: California Greenhouse Gas Forecast



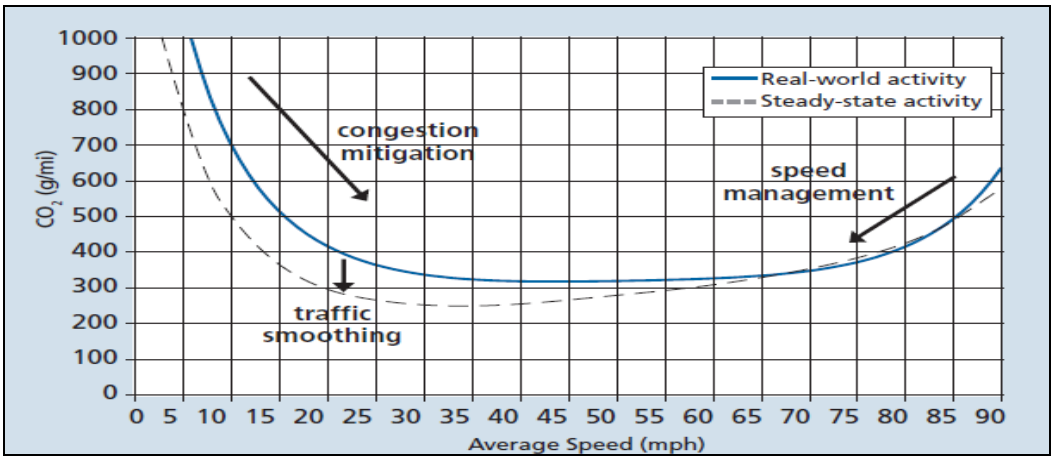
Source: http://www.arb.ca.gov/cc/inventory/data/forecast.htm

The Department and its parent agency, the Transportation Agency, have taken an active role in addressing GHG emission reduction and climate change. Recognizing that 98 percent of California's GHG emissions are from the burning of fossil fuels and 40 percent of all human made GHG emissions are from transportation, the Department has created and is implementing the Climate Action Program at Caltrans that was published in December 2006.[24]

One of the main strategies in the Department's Climate Action Program to reduce GHG emissions is to make California's transportation system more efficient. The highest levels of carbon dioxide (CO_2) from mobile sources, such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour (see Figure 50 below). To the extent that a project relieves congestion by enhancing operations and improving travel times in high congestion travel corridors GHG emissions, particularly CO_2, may be reduced.

[24] Caltrans Climate Action Program is located at the following web address: http://www.dot.ca.gov/hq/tpp/offices/ogm/key_reports_files/State_Wide_Strategy/Caltrans_Climate_Action_Program.pdf

Figure 50: Possible Effect of Traffic Operation Strategies in Reducing on Road CO2 Emissions



Source: Air Quality Analysis Report (September 2015)

As shown in Table 34, emissions of CO_2, and CO_2 (Pavley) for the Build Alternative result in increase in 2023 and 2040 when compared to the emissions for the No Build. The increase in GHG emissions over the No Build is likely due to the increase in traffic volumes in the Study Area with the construction of the new northbound I-110 HOT off-ramp at Figueroa St. Emissions for all future Build Alternatives increased when compared to the emissions in 2014. In general, projects that add capacity tend to have the highest potential of increasing GHG emissions. The proposed project, however, is anticipated to relieve congestion and improve traffic operations at the existing HOT off-ramp to Adams Blvd and at Figueroa St. and 23rd St. intersections.

Table 34: Percent Changes in GHG Emissions

TAC	2014	Opening Year 2023 (g/day)				Horizon Year 2040 (g/day)			
	Existing (g/day)	No-Build	Build	%Δ from Existing	%Δ from No-Build	No-Build	Build	%Δ from Existing	%Δ from No-Build
CO_2	0.856	1.031	1.275	49%	24%	1.12	1.386	62%	24%
CO_2 (Pavley)	0.784	0.73	0.902	15%	24%	0.731	0.907	16%	24%

Source: Air Quality Analysis Report (September 2015)

The northbound I-110 HOT lane facility ends approximately one-half mile south of Downtown Los Angeles, leaving HOT lane users to continue the rest of the journey to Downtown on surface arterial streets. This results in queuing and delay of traffic in the HOT off-ramp to Adams Blvd as well as mixed flow mainline. The project includes adding a new HOT off-ramp to Figueroa Street, eliminating the queuing and thus improving the operation and safety in the HOT off-ramp to Adams Blvd as well as along the mainline HOT lanes. The proposed project is anticipated to improve intersection delays and level of service at the local arterials and at the terminus of the existing ramps. The objective of the proposed project is consistent with the strategies for reducing GHG emissions from transportation sources. Refer to the Traffic and Transportation section in this document Tables 18 through 21 for traffic data, which shows an overall improvement in the average delay time as a result of the proposed Build Alternative.

The purpose of the project is to improve critical weaving and merging movements to allow more efficient discharge of traffic load. The currently approved plans are the 2016 RTP/SCS and the 2015 Federal Transportation Improvement Program (FTIP). The 2016 RTP/SCS was adopted by SCAG on April 7, 2016; FHWA and FTA approved the2016 RTP/SCS on June 1, 2016. The 2015 FTIP was federally approved on December 15, 2015. The most recent Amendment to the 2015 FTIP is No. 15-19, approved by FHWA and FTA on July 13, 2016.

The RTP/Sustainable Communities Strategy (SCS) includes a commitment to reduce emissions from all transportation sources in compliance with SB 375, improve public health, and meet air quality standards. Additional benefits of the RTP/SCS include reductions in GHG emissions within the air basin. A reduction of 8 percent by 2020, 18 percent by 2035, and 21 percent by 2040 is expected in the overall GHG emissions. Because the proposed project is included in the recent conforming RTP/SCS, it is part of the overall transportation network that is anticipated to achieve the expected GHG reductions.

As discussed earlier in the alternatives section, Transportation Demand Management (TDM) encourages public and private transit, ridesharing programs, and bicycle and pedestrian improvements as elements of a unified urban transportation system. TDM addresses traffic congestion by reducing travel demand rather than increasing transportation capacity and focuses on alternatives such as ride sharing, flextime, increased transit usage, walking, and bicycling. TDM focuses on regional strategies for reducing the number of vehicle trips and vehicle miles traveled and increasing vehicle occupancy. It facilitates higher vehicle occupancy or reduces traffic congestion by expanding the traveler's transportation choice. Because TDM strategies are currently employed in the project area and traffic congestion is still prevalent, TDM measures alone will not be adequate to meet the purpose of and need for the proposed project.

Multi-modal alternatives integrate multiple forms of transportation, such as pedestrian, bicycle, automobile, rail, and mass transit. Because a range of transportation options is currently available in the project area and traffic congestion is still prevalent, multi-modal alternatives alone will not be adequate to meet the purpose of and need for the proposed project.

Limitations and Uncertainties with Modeling

The EMFAC Web Database provides a quick and easy way to access commonly used EMFAC emissions and emission rates data without having to install and run the EMFAC model.

Although EMFAC can calculate CO_2 emissions from mobile sources, the model does have limitations when it comes to accurately reflecting changes in CO_2 emissions due to impacts on traffic. According to the National Cooperative Highway Research Program report, *Development of a Comprehensive Modal Emission Model* (April 2008) and a 2009 University of California study,[25] brief but rapid accelerations, such as those occurring during congestion, can contribute significantly to a vehicle's CO_2 emissions during a typical urban trip. Current emission-factor models are insensitive to the distribution of such modal events (i.e., cruise, acceleration, deceleration, and idling) in the operation of a vehicle and instead estimate emissions by average trip speed. This

25 Matthew Bartha, Kanok Boriboonsomsin. 2009. Energy and emissions impacts of a freeway-based dynamic eco-driving system. Transportation Research Part D: Transport and Environment
Volume 14, Issue 6, August 2009, Pages 400–410

limitation creates an uncertainty in the model's results when compared to the estimated emissions of the various alternatives with baseline in an attempt to determine impacts. Although work by EPA and the California Air Resources Board (CARB) is underway on modal-emission models, neither agency has yet approved a modal emissions model that can be used to conduct this more accurate modeling.

CARB is currently not using EMFAC to create its inventory of greenhouse gas emissions. It is unclear why the CARB has made this decision. Their website only states:

Both the EMFAC and OFF-ROAD Models develop CO_2 and CH_4 [methane] emission estimates; however, they are not currently used as the basis for [CARB's] official [greenhouse gas] inventory which is based on fuel usage information. . . However, ARB is working towards reconciling the emission estimates from the fuel usage approach and the models.[26]

Other Variables

With the current science, project-level analysis of greenhouse gas emissions has limitations. Although a greenhouse gas analysis is included for this project, there are numerous key greenhouse gas variables that are likely to change dramatically during the design life of the proposed project and would thus dramatically change the projected CO_2 emissions.

First, vehicle fuel economy is increasing. The EPA's annual report, "Light-Duty Automotive Technology and Fuel Economy Trends: 1975 through 2012 ,"[27] which provides data on the fuel economy and technology characteristics of new light-duty vehicles including cars, minivans, sport utility vehicles, and pickup trucks, confirms that average fuel economy has improved each year beginning in 2005, and is now at a record high. Corporate Average Fuel Economy (CAFE) standards remained the same between model years 1995 and 2003 and subsequently began setting increasingly higher fuel economy standards for future vehicle model years. The EPA estimates that light duty fuel economy rose by 16 percent from 2007 to 2012. Table 35 shows the increases in required fuel economy standards for cars and trucks between Model Years 2012 and 2025 as available from the National Highway Traffic Safety Administration for the 2012-2016 and 2017-2025 CAFE Standards.

Table 35: Average Required Fuel Economy (mpg)

	2012	2013	2014	2015	2016	2018	2020	2025
Passenger Cars	33.3	34.2	34.9	36.2	37.8	41.1-41.6	44.2-44.8	55.3-56.2
Light Trucks	25.4	26	26.6	27.5	28.8	29.6-30.0	30.6-31.2	39.3-40.3
Combined	29.7	30.5	31.3	32.6	34.1	36.1-36.5	38.3-38.9	48.7-49.7

Source: EPA 2013, http://www.epa.gov/fueleconomy/fetrends/1975-2012/420r13001.pdf

26 http://www.arb.ca.gov/msei/offroad.htm
27 http://www.epa.gov/oms/fetrends.htm

Second, near zero carbon vehicles will come into the market during the design life of this project. According to the 2013 Annual Energy Outlook (AEO2013): "LDVs that use diesel, other alternative fuels, hybrid-electric, or all-electric systems play a significant role in meeting more stringent GHG emissions and CAFE standards over the projection period. Sales of such vehicles increase from 20 percent of all new LDV sales in 2011 to 49 percent in 2040 in the AEO2013 Reference case."[28]

The greater percentage of alternative fuel vehicles on the road in the future will reduce overall GHG emissions as compared to scenarios in which vehicle technologies and fuel efficiencies do not change.

Third, California has recently adopted a low-carbon transportation fuel standard in 2009 to reduce the carbon intensity of transportation fuels by 10 percent by 2020. The regulation became effective on January 12, 2010 (codified in title 17, California Code of Regulations, Sections 95480-95490). Beginning January 1, 2011, transportation fuel producers and importers must meet specified average carbon intensity requirements for fuel in each calendar year.

Lastly, driver behavior has been changing as the U.S. economy and oil prices have changed. In its January 2008 report, "Effects of Gasoline Prices on Driving Behavior and Vehicle Market,"[29] the Congressional Budget Office found the following results based on data collected from California: 1) freeway motorists adjust to higher gas prices by making fewer trips and driving more slowly; 2) the market share of sports utility vehicles is declining; and 3) the average prices for larger, less-fuel-efficient models declined from 2003 to 2008 as average prices for the most-fuel-efficient automobiles have risen, showing an increase in demand for the more fuel efficient vehicles. More recent reports from the Energy Information Agency[30] and Bureau of Economic Analysis[31] also show slowing re-growth of vehicle sales in the years since its dramatic drop in 2009 due to the Great Recession as gasoline prices continue to climb to $4 per gallon and beyond.

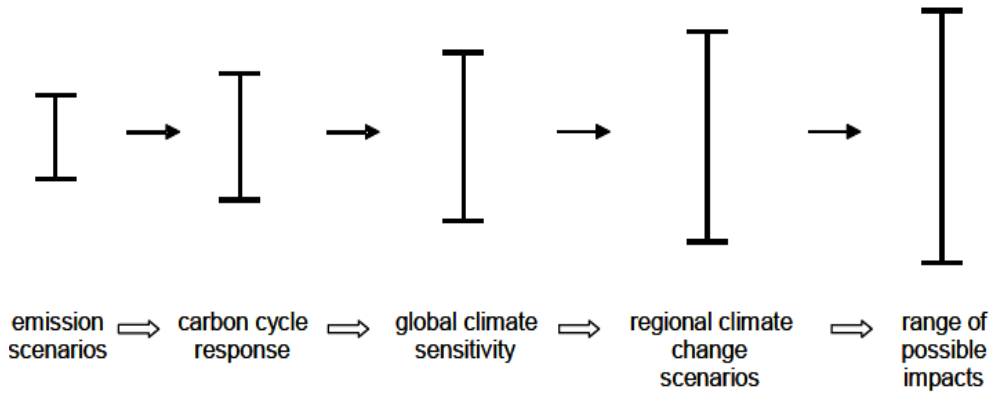
Limitations and Uncertainties with Impact Assessment

Taken from page 5-22 of the National Highway Traffic Safety Administration Final EIS for MY2017-2025 CAFE Standards (July 2012), Figure 51 illustrates how the range of uncertainties in assessing greenhouse gas impacts grows with each step of the analysis:

"Moss and Schneider (2000) characterize the 'cascade of uncertainty' in climate change simulations. As indicated in Figure 48, the emission estimates used in this EIS have narrower bands of uncertainty than the global climate effects, which are less uncertain than regional climate change effects. The effects on climate are, in turn, less uncertain than the impacts of climate change on affected resources (such as terrestrial and coastal ecosystems, human health, and other resources […] Although the uncertainty bands broaden with each successive step in the analytic chain, all values within the bands are not equally likely; the mid-range values have the highest likelihood."[32]

28 http://www.eia.gov/forecasts/aeo/pdf/0383(2013).pdf
29 http://www.cbo.gov/ftpdocs/88xx/doc8893/01-14-GasolinePrices.pdf
30http://www.eia.gov/oiaf/aeo/tablebrowser/aeo_query_server/?event=ehExcel.getFile&study=AEO2013&region=0-0&cases=ref2013-d102312a&table=114-AEO2013&yearFilter=0
31 Historical Vehicle Sales: www.bea.gov/national/xls/gap_hist.xls
32 http://www.nhtsa.gov/staticfiles/rulemaking/pdf/cafe/FINAL_EIS.pdf, page 5-22

Figure 51: Cascade of Uncertainties



Source: National Highway Traffic Safety Administration

Much of the uncertainty in assessing an individual project's impact on climate change surrounds the global nature of the climate change. Even assuming that the target of meeting the 1990 levels of emissions is met, there is no regulatory or other framework in place that would allow for a ready assessment of what any modeled increase in CO_2 emissions would mean for climate change given the overall California greenhouse gas emissions inventory of approximately 430 million tons of CO_2 equivalent. This uncertainty only increases when viewed globally. The IPCC has created multiple scenarios to project potential future global greenhouse gas emissions as well as to evaluate potential changes in global temperature, other climate changes, and their effect on human and natural systems. These scenarios vary in terms of the type of economic development, the amount of overall growth, and the steps taken to reduce greenhouse gas emissions. Non-mitigation IPCC scenarios project an increase in global greenhouse gas emissions by 9.7 up to 36.7 billion metric tons CO_2 from 2000 to 2030, which represents an increase of between 25 and 90 percent.[33]

The assessment is further complicated by the fact that changes in greenhouse gas emissions can be difficult to attribute to a particular project because the projects often cause shifts in the locale for some type of greenhouse gas emissions, rather than causing "new" greenhouse gas emissions. It is difficult to assess the extent to which any project level increase in CO_2 emissions represents a net global increase, reduction, or no change; there are no models approved by regulatory agencies that operate at the global or even statewide scale.

Construction Emissions

Greenhouse gas emissions for transportation projects can be divided into those produced during construction and those produced during operations. Construction GHG emissions include emissions produced as a result of material processing, emissions produced by on-site construction equipment, and emissions arising from traffic delays due to construction. These emissions will be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases.

33 Intergovernmental Panel on Climate Change (IPCC). February 2007. Climate Change 2007: The Physical Science Basis: Summary for Policy Makers. http://www.ipcc.ch/SPM2feb07.pdf.

In addition, with innovations such as longer pavement lives, improved traffic management plans, and changes in materials, the GHG emissions produced during construction can be mitigated to some degree by longer intervals between maintenance and rehabilitation events.

CEQA Conclusion

As discussed above, both the future with project and future no build show an increase in CO2 emissions over the existing levels; however, the future build CO2 emissions are higher than the future no build emissions. In addition, as discussed above, there are also limitations with EMFAC and with assessing what a given CO2 emissions increase means for climate change. Therefore, it is Caltrans determination that in the absence of further regulatory or scientific information related to greenhouse gas emissions and CEQA significance, it is too speculative to make a determination regarding significance of the project's direct impact and its contribution on the cumulative scale to climate change. However, Caltrans is firmly committed to implementing measures to help reduce the potential effects of the project. These measures are outlined in the following section.

Greenhouse Gas Reduction Strategies

The Department continues to be involved on the Governor's Climate Action Team as the ARB works to implement Executive Orders S-3-05 and S-01-07 and help achieve the targets set forth in AB 32. Many of the strategies the Department is using to help meet the targets in AB 32 come from then-Governor Arnold Schwarzenegger's Strategic Growth Plan for California. The Strategic Growth Plan targeted a significant decrease in traffic congestion below 2008 levels and a corresponding reduction in GHG emissions, while accommodating growth in population and the economy. The Strategic Growth Plan relies on a complete systems approach to attain CO_2 reduction goals: system monitoring and evaluation, maintenance and preservation, smart land use and demand management, and operational improvements as shown in Figure 52 the mobility pyramid.

Figure 52: Mobility Pyramid

The Department is supporting efforts to reduce vehicle miles traveled by planning and implementing smart land use strategies: job/housing proximity, developing transit-oriented communities, and high-density housing along transit corridors. The Department works closely with local jurisdictions on planning activities, but does not have local land use planning authority. The Department assists efforts to improve the energy efficiency of the transportation sector by increasing vehicle fuel economy in new cars, light and heavy-duty trucks; the Department is doing this by supporting ongoing research efforts at universities, by supporting legislative efforts to increase fuel economy, and by participating on the Climate Action Team. It is important to note, however, that control of fuel economy standards is held by the U.S. Environmental Protection Agency and the Air Resources Board.

The Department is also working towards enhancing the State's transportation planning process to respond to future challenges. Similar to requirements for regional transportation plans under Senate Bill (SB) 375 (Steinberg 2008), SB 391(Liu 2009) requires the State's long-range transportation plan to meet California's climate change goals under Assembly Bill (AB) 32. The California Transportation Plan (CTP) is a statewide, long-range transportation plan to meet our future mobility needs and reduce greenhouse gas (GHG) emissions. The CTP defines performance-based goals, policies, and strategies to achieve our collective vision for California's future, statewide, integrated, multimodal transportation system. The purpose of the CTP is to provide a common policy framework that will guide transportation investments and decisions by all levels of government, the private sector, and other transportation stakeholders. Through this policy framework, the CTP 2040 will identify the statewide transportation system needed to achieve maximum feasible GHG emission reductions while meeting the State's transportation needs.

Table 36 summarizes the Departmental and statewide efforts that the Department is implementing to reduce GHG emissions. More detailed information about each strategy is included in the Climate Action Program at Caltrans (December 2006).

Table 36: Climate Change/CO2 Reduction Strategies

Strategy	Program	Partnership		Method/Process	Estimated CO_2	
		Lead	Agency		2010	2020
Smart Land Use	Intergovernmental Review	Department	Local governments	Review and seek to mitigate development proposals	Not Estimated	Not Estimated
	Planning Grants	Department	Local and regional agencies and other stakeholders	Competitive selection process	Not Estimated	Not Estimated
	Regional Plans and Blueprint Planning	Regional agencies	Department	Regional plans and application process	0.975	7.8
Operational Improvements and Intelligent Transportation Systems Deployment	Strategic Growth Plan	Department	Regions	State ITS; Congestion Management Plan	0.007	2.17
Mainstream Energy and GHG Consideration in Plans and Projects	Office of Policy Analysis and Research; Division of Environmental Analysis	Interdepartmental effort		Policy establishment, guidelines and technical assistance	Not Estimated	Not Estimated
Educational and Informational Program	Office of Policy Analysis and Research	Interdepartmental, Cal/EPA, CARB, CEC		Analytical report, data collection, publication, workshops, outreach	Not Estimated	Not Estimated
Fleet Greening and Fuel Diversification	Division of Equipment	Department of General Services		Fleet replacement B20 B100	0.0045	0.0065 0.45 0.0225
Non-vehicular Conservation Measures	Energy Conservation Program	Green Action Team		Energy conservation opportunities	0.117	.34
Portland Cement	Office of Rigid Pavement	Cement and Construction Industries		2.5 % limestone cement mix 25% fly ash cement mix > 50% fly ash/slag mix	1.2 0.36	3.6
Goods Movement	Office of Goods Movement	Cal/EPA, CARB, BT&H, MPOs		Goods Movement Action Plan	Not Estimated	Not Estimated
Total					2.72	18.67
Note: MMT = million metric tons; Cal/EPA = California Environmental Protection Agency Source: Climate Action Program, Climate Change Report, 2006a						

Source: Air Quality Analysis Report (September 2015)

Caltrans Director's Policy 30 (DP-30) Climate Change (approved June 22, 2012) is intended to establish a Department policy that will ensure coordinated efforts to incorporate climate change into Departmental decisions and activities. Caltrans Activities to Address Climate Change (April 2013) provides a comprehensive overview of activities undertaken by Caltrans statewide to reduce greenhouse gas emissions resulting from agency operations.

GHG Emissions Reduction Strategies

- SCAG shall update any future Regional Transportation Plans/Sustainable Community Plans and Regional Comprehensive Plans to incorporate policies and measures that lead to reduced greenhouse gas (GHG) emissions. Such policies and measures may be derived from the General Plans, local jurisdictions' Climate Action Plans (CAPs), and other adopted policies and plans of its member agencies that include GHG mitigation and adaptation measures or other sources
- SCAG shall, through its on-going outreach and technical assistance programs, work with and encourage local governments to adopt policies and develop practices that lead to GHG emission reductions. These activities will include, but are not limited to, providing technical assistance and information sharing on developing local Climate Action Plans
- SCAG shall work with the business community, including the Southern California Leadership Council and the Global Land Use and Environment Council, to develop regional economic strategies that promote energy savings and GHG emission reduction
- SCAG shall develop statewide strategies and approaches to reducing GHG emissions and implement SB 375 through its on-going coordination effort with other MPOs
- SCAG shall assist ARB and air districts in efforts to implement the AB 32 Scoping Plan
- SCAG shall develop a regional climate and economic development strategy that assesses the cost effectiveness of GHG reduction measures and prioritizes strategies that have greatest overall benefit to the economy
- SCAG, in its capacity as a Clean Cities Coalition, shall work with member local governments to promote the use of alternative fuel technology
- SCAG shall work with utilities, sub-regions, and other stakeholders to promote accelerated penetration of zero emission electric vehicles in the region, including developing a strategy for the deployment of public charging infrastructure
- SCAG member cities and the county governments can and should adopt and implement Climate Actions Plans (CAPs, also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions) that contain the following information:

a) Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within their respective jurisdictions
b) Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable
c) Identify and analyze the GHG emissions resulting for specific actions or categories of actions anticipated within their respective jurisdictions

d) Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
e) Establish a mechanism to monitor the plan's progress toward achieving that level and to require amendment if the plan is not achieving specified levels
f) Be adopted in a public process following environmental review. CAPs can and should, when appropriate, incorporate planning and land use measures from the California Attorney General's latest list of example policies to address climate change at both the plan and project level. Specifically, at the plan level, land use plans can and should, when appropriate, incorporate planning and land use measures from the California Attorney General's latest list of example policies to address climate change (http://ag.ca.gov/globalwarming/pdf/GP_policies.pdf), including, but not limited to policies from that web page such as:

- Smart growth, jobs/housing balance, transit-oriented development, and infill development through land use designations, incentives and fees, zoning, and public private partnerships
- Create transit, bicycle, and pedestrian connections through planning, funding, development requirements, incentives and regional cooperation, and create disincentives for auto use
- Energy and water-efficient buildings and landscaping through ordinances, development fees, incentives, project timing, prioritization, and other implementing tools

In addition, member cities and the county governments can and should incorporate, as appropriate, policies to encourage implementation of the Attorney General's list of project specific mitigation measures available at the following web site: http://ag.ca.gov/globalwarming/pdf/ GW_mitigation_measures.pdf, including, but not limited to measures from the web page, such as:

- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation
- Build or fund a major transit stop within or near development
- Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers
- Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments
- Require amenities for non-motorized transportation, such as secure and convenient bicycle parking

They should also incorporate, when appropriate, planning and land use measures from additional resources listed by the California Attorney General at the following webpage: http://ag.ca.gov/globalwarming/ceqa/resources.php.

In addition, CAPs can and should also incorporate analysis of climate change adaptation, in recognition of the likely and potential effects of climate change in the future regardless of the level of mitigation and in conjunction with Executive Order S-13-08, which seeks to enhance the State's management of climate impacts including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of State's first climate adaptation strategy.

Project sponsors can and should require Best Available Control Technology (BACT) during construction and operation of projects, including:

a) Solicit bids that include use of energy and fuel-efficient fleets;
b) Solicit preference construction bids that use BACT
c) Employ use of alternative fueled vehicles
d) Use lighting systems that are energy efficient, such as LED technology
e) Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan
f) Streamline permitting process to infill, redevelopment, and energy-efficient projects
g) Use an adopted emissions calculator to estimate construction-related emissions
h) Use the minimum feasible amount of GHG-emitting construction materials that is feasible
i) Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production
j) Use of lighter-colored pavement where feasible
k) Recycle construction debris to maximum extent feasible
l) Plant shade trees in or near construction projects where feasible

- SCAG shall in its capacity as a Clean Cities Coalition, and local jurisdictions can and should establish a coordinated, creative public outreach campaign, including publicizing the importance of reducing GHG emissions and steps community members can take to reduce their individual impacts
- Pedestrian and Bicycle Promotion: SCAG shall and local jurisdictions can and should work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation
- Waste Reduction: Local jurisdictions can and should organize workshops on waste reduction activities for the home or business, such as backyard composting, or office paper recycling, and will schedule recycling drop-off events and neighborhood chipping/mulching days

- Water Conservation: SCAG shall and local jurisdictions can and should organize workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems
- Energy Efficiency: SCAG shall and local jurisdictions can and should organize workshops on steps to increase energy efficiency in the home or business, such as weatherizing the home or building envelope, installing smart lighting systems, and how to conduct a self-audit for energy use and efficiency
- Climate Protection Summit/Fair: SCAG shall and local jurisdictions can and should organize an annual Climate Protection Summit or Fair, to educate the public on current climate science, projected local impacts, and local efforts and opportunities to reduce GHG emissions, including exhibits of the latest technology and products for conservation and efficiency
- Schools Programs: SCAG shall and local jurisdictions can and should develop and implement a program to present information to school children about climate change and ways to reduce GHG emissions, and will support school-based programs for GHG reduction, such as school based trip reduction and the importance of recycling

- The Department and the California Highway Patrol are working with regional agencies to implement Intelligent Transportation Systems (ITS) to help manage the efficiency of the existing highway system. ITS commonly consists of electronics, communications, or information processing used singly or in combination to improve the efficiency or safety of a surface transportation system
- In addition, the Council of Los Angeles County Governments provides ridesharing services and park-and-ride facilities to help manage the growth in demand for highway capacity
- Landscaping reduces surface warming and, through photosynthesis, decreases CO_2. The project will include planting wherever feasible planting a variety of different-sized plant material
- According to Caltrans Standard Specifications, the contractor must comply with all of the local AQMD rules, ordinances, and regulations regarding air quality restrictions including, but not limited to, the SCAQMD's Rules 401, 402, and 403

Finally, a discussion of fugitive dust control measure is provided, and it is recommended that the measures be included as project commitments during construction activities. Below are best available control measures, which are applicable to all construction activity sources per SCAQMD Rule 403 Table 1 (shown in Table 37), SCAQMD Rule 403 Table 2 (shown in Table 38), and SCAQMD Rule 403 Table 3 (shown in Table 39) per the Air Quality Analysis Report (September 2015).

Table 37: SCAQMD Rule 403 Table 1 Best Available Control Measures (Applicable to All Construction Activity Sources)

Source Category	Control Measure	Guidance
Backfilling	01-1 Stabilize backfill material when not actively handling; and 01-2 Stabilize backfill material during handling; and 01-3 Stabilize soil at completion of activity.	✓ Mix backfill soil with water prior to moving ✓ Dedicate water truck or high capacity hose to backfilling equipment ✓ Empty loader bucket slowly so that no dust plumes are generated ✓ Minimize drop height from loader bucket
Clearing and grubbing	02-1 Maintain stability of soil through pre-watering of site prior to clearing and grubbing; and 02-2 Stabilize soil during clearing and grubbing activities; and 02-3 Stabilize soil immediately after clearing and grubbing activities.	✓ Maintain live perennial vegetation where possible ✓ Apply water in sufficient quantity to prevent generation of dust plumes
Clearing forms	03-1 Use water spray to clear forms; or 03-2 Use sweeping and water spray to clear forms; or 03-3 Use vacuum system to clear forms.	✓ Use of high pressure air to clear forms may cause exceedance of Rule requirements
Crushing	04-1 Stabilize surface soils prior to operation of Support equipment; and 04-2 Stabilize material after crushing.	✓ Follow permit conditions for crushing equipment ✓ Pre-water material prior to loading into crusher ✓ Monitor crusher emissions opacity ✓ Apply water to crushed material to prevent dust plumes
Cut and fill	05-1 Pre-water soils prior to cut and fill activities; and 05-2 Stabilize soil during and after cut and fill activities.	✓ For large sites, pre-water with sprinklers or water trucks and allow time for penetration ✓ Use water trucks/pulls to water soils to depth of cut prior to subsequent cuts
Demolition - Mechanical/manual	06-1 Stabilize wind erodible surfaces to reduce dust; and 06-2 Stabilize surface soil where support equipment and vehicles will operate; and 06-3 Stabilize loose soil and demolition debris; and 06-4 Comply with AQMD Rule 1403.	✓ Apply water in sufficient quantities to prevent the generation of visible dust plumes
Disturbed soil	07-1 Stabilize disturbed soil throughout the construction site; and 07-2 Stabilize disturbed soil between structures	✓ Limit vehicular traffic and disturbances on soils where possible ✓ If interior block walls are planned, install as early as possible ✓ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes

Earth-moving activities	08-1 Pre-apply water to depth of proposed cuts; and 08-2 Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction; and 08-3 Stabilize soils once earth-moving activities are complete.	✓ Grade each project phase separately, timed to coincide with construction phase ✓ Upwind fencing can prevent material movement on site ✓ Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
Importing/exporting of bulk materials	09-1 Stabilize material while loading to reduce fugitive dust Emissions; and 09-2 Maintain at least six inches of freeboard on haul vehicles; and 09-3 Stabilize material while transporting to reduce fugitive dust emissions; and 09-4 Stabilize material while unloading to reduce fugitive dust emissions; and 09-5 Comply with Vehicle Code Section 23114.	✓ Use tarps or other suitable enclosures on haul trucks ✓ Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage ✓ Comply with track-out prevention/mitigation requirements ✓ Provide water while loading and unloading to reduce visible dust plumes
Landscaping	10-1 Stabilize soils, materials, slopes	✓ Apply water to material to stabilize ✓ Maintain materials in a crusted condition ✓ Maintain effective cover over materials ✓ Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes ✓ Hydro seed prior to rain season
Road shoulder maintenance	11-1 Apply water to unpaved shoulders prior to clearing; and 11-2 Apply chemical dust suppressants and/or washed gravel to maintain a stabilized surface after completing road shoulder maintenance.	✓ Installation of curbing and/or paving of road shoulders can reduce recurring maintenance costs ✓ Use of chemical dust suppressants can inhibit vegetation growth and reduce future road shoulder maintenance costs
Screening	12-1 Pre-water material prior to screening; and 12-2 Limit fugitive dust emissions to opacity and plume length standards; and 12-3 Stabilize material immediately after screening.	✓ Dedicate water truck or high capacity hose to screening operation ✓ Drop material through the screen slowly and minimize drop height ✓ Install wind barrier with a porosity of no more than 50% upwind of screen to the height of the drop point
Staging areas	13-1 Stabilize staging areas during use; and 13-2 Stabilize staging area soils at project completion.	✓ Limit size of staging area ✓ Limit vehicle speeds to 15 miles per hour ✓ Limit number and size of staging area entrances/exists

Stockpiles/ Bulk Material Handling	14-1 Stabilize stockpiled materials. 14-2 Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water truck access or must have an operational water irrigation system that is capable of complete stockpile coverage.	✓ Add or remove material from the downwind portion of the storage pile ✓ Maintain storage piles to avoid steep sides or faces
Traffic areas for construction activities	15-1 Stabilize all off-road traffic and parking areas; and 15-2 Stabilize all haul routes; and 15-3 Direct construction traffic over established haul routes.	✓ Apply gravel/paving to all haul routes as soon as possible to all future roadway areas water trucks and allow time for penetration ✓ Barriers can be used to ensure vehicles are only used on established parking areas/haul routes
Trenching	16-1 Stabilize surface soils where trencher or excavator and Support equipment will operate; and 16-2 Stabilize soils at the completion of trenching activities.	✓ Pre-watering of soils prior to trenching is an effective preventive measure. For deep trenching Activities, pre-trench to 18 inches soak soils via the pre-trench and resuming trenching ✓ Washing mud and soils from equipment at the conclusion of trenching activities can prevent Crusting and drying of soil on equipment
Turf Overseeding	18-1 Apply sufficient water immediately prior to conducting turf vacuuming activities to meet opacity and plume length standards; and 18-2 Cover haul vehicles prior to exiting the site.	✓ Haul waste material immediately off-site
Unpaved roads/parking lots	19-1 Stabilize soils to meet the applicable performance standards; and 19-2 Limit vehicular travel to established unpaved roads (haul routes) and unpaved parking lots.	✓ Restricting vehicular access to established unpaved travel paths and parking lots can reduce Stabilization requirements
Vacant land	20-1 In instances where vacant lots are 0.10 acre or larger and have a cumulative area of 500 square feet or more that are driven over and/or used by motor vehicles and/or off-road vehicles, prevent motor vehicle and/or off-road vehicle trespassing, parking and/or access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees or other effective control measures.	

Source: Air Quality Analysis Report (September 2015)

Table 38: SCAQMD Rule 403 Table 2 Dust Control Measures for Large Operations

FUGITIVE DUST SOURCE CATEGORY	CONTROL ACTIONS
Earth-moving (except construction cutting and filling areas, and mining operations)	(1a) Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations each subsequent four-hour period of active operations; OR (1a-1) For any earth-moving which is more than 100 feet from all property lines, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction.
Earth-moving: Construction fill areas:	(1b) Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D-2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. For areas which have an optimum moisture content for compaction of less than 12 percent, as determined by ASTM Method 1557 or other equivalent method approved by the Executive Officer and the California Air Resources Board and the U.S. EPA, complete the compaction process as expeditiously as possible after achieving at least 70 percent of the optimum soil moisture content. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations during each subsequent four-hour period of active operations.
Earth-moving: Construction cut areas and mining operations:	(1c) Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut or mining area unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.
Disturbed surface areas (except completed grading areas)	(2a/b) Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust must have an application of water at least twice per day to at least 80 percent of the unstabilized area.
Disturbed surface areas: Completed grading areas	(2c) Apply chemical stabilizers within five working days of grading completion; OR (2d) Take actions (3a) or (3c) specified for inactive disturbed surface areas.
Inactive disturbed surface areas	(3a) Apply water to at least 80 percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust, excluding any areas which are inaccessible to watering vehicles due to excessive slope or other safety conditions; OR (3b) Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR (3c) Establish a vegetative ground cover within 21 days after active operations have ceased. Ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter; OR (3d) Utilize any combination of control actions (3a), (3b), and (3c) such that, in total, these actions apply to all inactive disturbed surface areas.

Unpaved Roads	(4a) Water all roads used for any vehicular traffic at least once per every two hours of active operations [3 times per normal 8 hours work day]; OR (4b) Water all roads used for any vehicular traffic once daily and restrict vehicle speeds to 15 miles per hour; OR (4c) Apply a chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a stabilized surface.
Open storage piles	(5a) Apply chemical stabilizers; OR (5b) Apply water to at least 80 percent of the surface area of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust; OR (5c) Install temporary coverings; OR (5d) Install a three-sided enclosure with walls with no more than 50 percent porosity which extend, at a minimum, to the top of the pile. This option may only be used at aggregate-related plants or at cement manufacturing facilities.
All Categories	(6a) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 2 may be used.

Source: Air Quality Analysis Report (September 2015)

Table 39: SCAQMD Rule 403 Table 3 Dust Control Measures for Large Operations

FUGITIVE DUST SOURCE CATEGORY	CONTROL MEASURES
Earth-moving	(1A) Cease all active operations; OR (2A) Apply water to soil not more than 15 minutes prior to moving such soil.
Disturbed surface areas	(0B) On the last day of active operations prior to a weekend, holiday, or any other period when active operations will not occur for not more than four consecutive days: apply water with a mixture of chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of six months; OR (1B) Apply chemical stabilizers prior to wind event; OR (2B) Apply water to all unstabilized disturbed areas 3 times per day. If there is any evidence of wind driven fugitive dust, watering frequency is increased to a minimum of four time per day; OR (3B) Take the actions specified in Table 2, Item (3c); OR (4B) Utilize any combination of control actions (1B), (2B), and (3B) such that, in total, these actions apply to all disturbed surface areas.
Unpaved roads	(1C) Apply chemical stabilizers prior to wind event; OR (2C) Apply water twice per hour during active operation; OR (3C) Stop all vehicular traffic.
Open storage piles	(1D) Apply water twice per hour; OR (2D) Install temporary coverings.
Paved road track-out	(1E) Cover all haul vehicles; OR (2E) Comply with the vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.
All Categories	(1F) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 3 may be used.

Source: Air Quality Analysis Report (September 2015)

Adaptation Strategies

"Adaptation strategies" refer to how the Department and others can plan for the effects of climate change on the state's transportation infrastructure and strengthen or protect the facilities from damage. Climate change is expected to produce increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and intensity, and the frequency and intensity of wildfires. These changes may affect the transportation infrastructure in various ways, such as damage to roadbeds from longer periods of intense heat; increasing storm damage from flooding and erosion; and inundation from rising sea levels. These effects will vary by location and may, in the most extreme cases, require that a facility be relocated or redesigned. There may also be economic and strategic ramifications as a result of these types of impacts to the transportation infrastructure.

At the Federal level, the Climate Change Adaptation Task Force, co-chaired by the White House Council on Environmental Quality (CEQ), the Office of Science and Technology Policy (OSTP), and the National Oceanic and Atmospheric Administration (NOAA), released its interagency task force progress report on October 28, 2011[34], outlining the federal government's progress in expanding and strengthening the Nation's capacity to better understand, prepare for, and respond to extreme events and other climate change impacts. The report provides an update on actions in key areas of federal adaptation, including: building resilience in local communities, safeguarding critical natural resources such as freshwater, and providing accessible climate information and tools to help decision-makers manage climate risks .

Climate change adaptation must also involve the natural environment as well. Efforts are underway on a statewide-level to develop strategies to cope with impacts to habitat and biodiversity through planning and conservation. The results of these efforts will help California agencies plan and implement mitigation strategies for programs and projects.

On November 14, 2008, then-Governor Arnold Schwarzenegger signed EO S-13-08, which directed a number of state agencies to address California's vulnerability to sea level rise caused by climate change. This EO set in motion several agencies and actions to address the concern of sea level rise.

In addition to addressing projected sea level rise, the California Natural Resources Agency (Resources Agency) was directed to coordinate with local, regional, state and federal public and private entities to develop The California Climate Adaptation Strategy (Dec 2009)[35], which summarizes the best-known science on climate change impacts to California, assesses California's vulnerability to the identified impacts, and then outlines solutions that can be implemented within and across state agencies to promote resiliency.

The strategy outline is in direct response to EO S-13-08 that specifically asked the Resources Agency to identify how state agencies can respond to rising temperatures, changing precipitation patterns, sea level rise, and extreme natural events. Numerous other state agencies were involved in

[34] http://www.whitehouse.gov/administration/eop/ceq/initiatives/adaptation

[35] http://www.energy.ca.gov/2009publications/CNRA-1000-2009-027/CNRA-1000-2009-027-F.PDF

the creation of the Adaptation Strategy document, including the California Environmental Protection Agency; Business, Transportation and Housing; Health and Human Services; and the Department of Agriculture. The document is broken down into strategies for different sectors that include: Public Health; Biodiversity and Habitat; Ocean and Coastal Resources; Water Management; Agriculture; Forestry; and Transportation and Energy Infrastructure. As data continues to be developed and collected, the state's adaptation strategy will be updated to reflect current findings.

The National Academy of Science was directed to prepare a Sea Level Rise Assessment Report[36] to recommend how California should plan for future sea level rise. The report was released in June 2012 and included:

- Relative sea level rise projections for California, Oregon and Washington taking into account coastal erosion rates, tidal impacts, El Niño and La Niña events, storm surge and land subsidence rates
- The range of uncertainty in selected sea level rise projections
- A synthesis of existing information on projected sea level rise impacts to state infrastructure (such as roads, public facilities and beaches), natural areas, and coastal and marine ecosystems
- A discussion of future research needs regarding sea level rise

In 2010, interim guidance was released by The Coastal Ocean Climate Action Team (CO-CAT) as well as Caltrans as a method to initiate action and discussion of potential risks to the states infrastructure due to projected sea level rise. Subsequently, CO-CAT updated the Sea Level Rise guidance to include information presented in the National Academies Study.

All state agencies that are planning to construct projects in areas vulnerable to future sea level rise are directed to consider a range of sea level rise scenarios for the years 2050 and 2100 to assess project vulnerability and, to the extent feasible, reduce expected risks and increase resiliency to sea level rise. Sea level rise estimates should also be used in conjunction with information on local uplift and subsidence, coastal erosion rates, predicted higher high water levels, storm surge and storm wave data.

All projects that have filed a Notice of Preparation as of the date of EO S-13-08, and/or are programmed for construction funding from 2008 through 2013, or are routine maintenance projects may, but are not required to, consider these planning guidelines. The proposed project is outside the coastal zone and direct impacts to transportation facilities due to projected sea level rise are not expected.

Executive Order S-13-08 also directed the Business, Transportation, and Housing Agency to prepare a report to assess vulnerability of transportation systems to sea level rise affecting safety, maintenance and operational improvements of the system, and economy of the state. The Department continues to work on assessing the transportation system vulnerability to climate change, including the effect of sea level rise.

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[36] *Sea Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* (2012) is available at http://www.nap.edu/catalog.php?record_id=13389.

Currently, the Department is working to assess which transportation facilities are at greatest risk from climate change effects. However, without statewide planning scenarios for relative sea level rise and other climate change effects, the Department has not been able to determine what change, if any, may be made to its design standards for its transportation facilities. Once statewide planning scenarios become available, the Department will be able review its current design standards to determine what changes, if any, may be needed to protect the transportation system from sea level rise.

Climate change adaptation for transportation infrastructure involves long-term planning and risk management to address vulnerabilities in the transportation system from increased precipitation and flooding; the increased frequency and intensity of storms and wildfires; rising temperatures; and rising sea levels. The Department is an active participant in the efforts being conducted in response to EO S-13-08 and is mobilizing to be able to respond to the National Academy of Science Sea Level Rise Assessment Report.

Chapter 4 Comments and Coordination

Early and continuing coordination with the general public and public agencies is an essential part of the environmental process. It helps planners determine the necessary scope of environmental documentation and the level of analysis required, and to identify potential impacts and avoidance, minimization and/or mitigation measures and related environmental requirements. Agency consultation and public participation for this project have been accomplished through a variety of formal and informal methods, including Project Development Team (PDT) meetings, courtesy coordination meetings, and informational meetings. This chapter summarizes the results of the Department's efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

The PDT is an internal project team, which is formed with project staff from many different disciplines to help the project manager in directing the course of studies makes recommendations and works to carry out the project work plan. They participate in major meetings, public hearings and community involvement. They also serve as the nucleus for value analysis and are responsible for conducting studies and accumulating data throughout project development.

At a minimum, a PDT is composed of the project manager, a representative of the regional transportation planning agency (if involved), and representatives from district design, environmental, traffic, safety, surveys, construction, and maintenance units, and the right of way branch. An environmental representative is a required member. The selection of additional team members depends on the scope and complexity of the proposed project. The interdisciplinary skills of the district, Headquarters, FHWA, local and regional agencies, and other sources are requested as needed, to ensure that engineering, social, economic, and environmental aspects are adequately assessed, and reasonable evaluations and decisions are made. Representatives of resource and regulatory agencies are encouraged to participate. The PDT may include individuals from local or regional agencies and/or representatives of community groups.

The Project Development Team fulfills many critical duties throughout the life of a project, including:

- Ensure quality project design
- Reevaluate systems planning recommendations
- Determine logical project limits
- Determine the need for external members and advisory committees
- Recommend studies, timetables, alternatives, type of environmental document, and the feasibility of mitigation measures
- Ensure thorough analysis of social, economic, environmental and engineering issues
- Plan and initiate public outreach
- Ensure that state and federal requirements are met
- Recommend a preferred alternative
- Ensure timely right-of-way acquisition
- Provide advice during construction
- Ensure that project history is preserved

Consultation and Coordination

Refer to the Distribution List in Chapter 5 of this document for lists Federal agencies, State agencies, interested parties, and schools.

Caltrans

Notice of Scoping/Initiation of Studies for I-110 Transitway Connector Project

What is Being Planned?

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), is initiating the preparation of an Initial Study/Environmental Assessment to analyze improvement alternatives to the current termination of the I-110 Transitway (HOV/HOT lanes) at Adams Blvd. intersection. Proposed improvements at this location would alleviate congestion and reduce queuing/delay on the Transitway and off-ramp. This could include the construction of a flyover ramp to Figueroa Way.

Why This Notice?

The project team is beginning environmental and engineering studies for the project. Your input on pertinent environmental issues, the project's purpose and need and range of alternatives, and related information is being solicited. We want to hear your thoughts and welcome your participation. A Notice of Preparation is available for public review and comment between January 28, 2013 and February 28, 2013 in conformance with the California Environmental Quality Act.

Where Do You Come In?

You may submit written comment that will become part of the project's public record no later than February 28, 2013 to:

Ronald J. Kosinski, Deputy District Director
California Department of Transportation
Division of Environmental Planning
100 S. Main Street – MS 16A
Los Angeles, CA 90012

Contact

If you have questions, please contact Garrett Damrath in the Division of Environmental Planning at (213) 897-9016.

Thank you for your interest!

UNIVERSITY PARK

HISTORIC PRESERVATION OVERLAY ZONE

EST. MARCH 22 2000 BY ORDINANCE #171686

UNIVERSITY PARK H.P.O.Z. BOARD

JEAN FROST, CHAIRPERSON
JIM ROBINSON, VICE CHAIRPERSON
DAN BURKE, BOARDMEMBER
DAVID RAPOSA, TREASURER
JOHN ARNOLD, ARCHITECT

Mr. Garrett Damrath, Senior Environmental Planner
Ms. Allison Morrow
Division of Environmental Planning Cal-Trans District 7
100 South Main Street
Los Angeles, CA 90012

March 08, 2013
Via email: Allison_Morrow@DOT.CA.GOV

RE: NOTICE OF PREPARATION (NOP) - DRAFT INITIAL STUDY, I-110 TRANSIT-WAY CONNECTOR PROJECT (110 HOV/HOT OFF RAMP TO FIGUEROA WAY, L.A, CA)

Dear Administrators,

First I would like to thank you for extending the public comment period. This enabled us to place the issue on the agenda for our public hearing this last Tuesday, March 05. I am writing as Chair of the University Park HPOZ Board, at their request by unanimous approved Motion, in response to the above referenced proposed development Project.

We have concerns about this proposed Project's ability to comply with the requirements of the California Environmental Quality Act (CEQA), the National Environmental Quality Act (NEPA), the Secretary of the Interior's Standards & Guidelines (SISG), and the South Area Community Plan (SACP) as well as the General Plan.

We ask that University Park HPOZ Board be listed as a "party of interest" in any and all future actions, and notices, regarding the environmental review process for the above referenced subject property. Although the subject site is located just outside the administrative boundaries of our HPOZ, we find that it has potential significant negative impacts to the Chester Place National Register Historic District for which our Board has administrative responsibilities under Los Angeles City Ordinance.

Our Board is required under that Ordinance to insure CEQA compliance for all projects that may have potential negative impacts to the character defining features of the Historic District. It is our Board's custom and practice to not be limited in our

1

comments to artificial boundaries but to view the context of the whole of the historic community setting. The intersection of Adams Boulevard and Figueroa Street is a primary gateway portal to the historic University Park neighborhoods.

On three of the four corners of that intersection are Los Angeles Historic-Cultural Monuments that exemplify the finest architectural work of renown Southern California architects: Sumner P. Hunt's, Spanish Colonial Style, Auto Club of Southern California (No.72), Albert C. Martin's, California Mission Style, St. Vincent De Paul Church (No.90), and F. Pierpont Davis's, Italian Romanesque Style, St. John's Episcopal Church (No.516). This visual triptych of historic Monuments is a unique cultural asset of our City, which requires the most stringent review of potential impacts caused by any new construction.

The current proposal by CALTRANS for a Flyover exit-ramp above Adams Boulevard, which is a designated "Scenic Highway" and adjacent to St. John's Church would be a non-mitigationable visual blight on this historic setting. This conclusion was determined in your own FIER for the Northern Terminus of the I-110 Transitway in 1992 when the Alternative-A was selected as the Preferred Alternative for compliance with CEQA.

Prior to the establishment of the University Park HPOZ in 2000 this community was part of the CRA/LA Adams Normandie 4321 Project Area. I served as Chair of the AN-4321 Project Area Committee which made comment to the Initial Study in 1990 that is available in the FEIR's Appendix A page A-23. It is to say the least disturbing to revisit this issue again after 23 years.

Our Board was forwarded the comment response letters from: the West Adams Heritage Association, the North University Park Community Association, the Adams Dockweiler Heritage Association, and St. John's Episcopal Church prior to our meeting and heard public testimony. We found that the substance of the concerns raised about the proposed Project's potential negative impacts to the historic setting were of concern to our Board as well. Given the lack of community outreach so far by CALTRANS we would hope that you consider a public meeting forum at some in the immediate future to share your reasons for this proposed Project.

Our Board, other preservation organizations, directly affected stakeholders and concerned community members will of course be making comment as the CEQA process occurs. We appreciate your consideration in this matter and look forward to meaningful future dialogue with CALTRANS.

Respectfully yours,

Jean Frost, Chair, University Park HPOZ Board
Tel: 213-747-2526 / email: jfrost@earthlink.net
2341 Scarff Street, Los Angeles Calif. 90007

PS: Contact Los Angeles Department of City Planning
Office of Historic Resources City Hall / Room 620
200 N. Spring Street / Los Angeles, CA 90012
Ken.Bernstein@lacity.org
Lambert.Giessinger@lacity.org
Michelle.Levy@lacity.org
Steven.Wechsler@lacity.org

N. U. P. C. A.
NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION
P.O. Box 15881 University Park California 90015 (213) 748-1656

February 28, 2013

Garrett Damrath, Senior Environmental Planner
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

RE: 07-LA-110 PM 20.1120.92
Interstate 1-110 HOV/T Connector Project
Adams Blvd. to Figueroa Way

Dear Administrators:

I am writing on behalf of the North University Park Community Association (NUPCA). We have been engaged in advocacy related to historic preservation and land use in University Park and the larger Historic West Adams District for three decades. I have personally served as NUPCA's representative to the Community Redevelopment Agency's Exposition-University Park Project Area (which is adjacent to this project site) since 1989, and am very familiar with the environmental setting in which this project is proposed.

For this reason I truly was stunned to learn of this potential project. An elevated bridge structure of any sort would have a very negative impact on one of the most sensitive historical areas in Los Angeles.

An elevated bridge would certainly have incompatible massing and scale adjacent to a roster of designated historic resources, including St. John's Episcopal Cathedral, the Automobile Club of Southern California, St. Vincent's Cathedral, the Stimson Residence, the Woolen Mills Zanja, the Slauson Residence, and, of course, the Chester Place National Register Historic District.

In addition, there is a major streetscape improvement project plan for this same area. "My Figueroa" is a publicly-funded street improvement initiative that includes pedestrian infrastructure, expanded sidewalks, pedestrian plazas, lighting, and a dedicated/separated bicycle lanes, as well as (in our understanding) greening efforts that may potentially include park space at Figueroa and Adams. How would an elevated bridge with a terminus in this location mix at all with that project?

We would like to be sure any project and/or environmental evaluation thoroughly assesses the impacts this project will have on the adjacent residential community of University Park (particularly traffic circulation – so-called "cut-through traffic" that may result from a new terminus at or near 23rd Street), impacts on the historic character and fabric of the University Park community, the visual/aesthetic relationship this will have on adjacent historic sites, and the role this project plays cumulatively with the many other projects recently completed, currently in plan review and/or under construction along the Figueroa Corridor.

NUPCA also requests a copy of the DEIR and notice of any and all administrative hearings and processes. Please utilize my home address, 1818 South Gramercy Place, Los Angeles, CA 90019 for such mail (or, for notices, my personal e-mail, lauramink@aol.com).

We do have some specific concerns we would like to see addressed by the DEIR preparers.

*** A Sensitive Historic Site**

This project may have potential negative impacts to adjacent historic landmark properties AND specifically may cause the removal of significant historic fabric. We are specifically concerned about the last remaining intact and visible section of the historic Zanja (Los Angeles's original open air irrigation system, dating from the mid-19th century).

The proposed structure is adjacent to and would have direct sightline and other impacts upon St. Vincent De Paul Church (Los Angeles Historic Cultural Monument No. 90), the Stimson Residence (HCM No. 212), and the Doheny Mansion (HCM No. 30), as well as the other nearby historic structures that are part of the Chester Place District.

*** Lighting and Signage (Visual Blight)**

Recently, neighbors in Pico Union have been dramatically impacted by lighting and visible signage from tall buildings to the east of their neighborhood (e.g., from the Staples Center and L.A. Live). We want to be assured that this taller-than-other-structures project will not create sight-line issues/impacts on the residential neighborhoods that will lie below it to the west.

* Cumulative Impacts

There are many recent, current and proposed large-scale projects on the Figueroa Corridor and in University Park. Some of them include: University Gateway, the Tuscany, the plans for re-making University Village, a transit-oriented residential project proposed at 31st Street between Flower and Figueroa, another similar project at Figueroa and Exposition, the Palmer development at the Orthopedic Hospital site, the new charter school at 23rd and Figueroa, proposed condominiums in University Park at Oak and

Roland Souza
<roland.e.souza@gmail.com>
03/08/2013 04:18 PM

To <Allison_morrow@DOT.CA.gov>
cc
bcc
Subject

To Mr Garrett Damrath
Senior Envirmental Planner
Division Of Enviormental Planning Caltrans Distict 7
110 South Main St.
Los Angeles CA 90012

Re 110 HOV-HOT Transitway connector project / off ramp to Figueroa Way L A Ca

Dear Mr Damrath
I am writing regarding the proposed "flyover" off ramp connector proposed next to the historic St Johns Church at Adams Blvd. As a stakeholder and resident of nearby 24 Th St, I have concerns about the visual and noise level impact to the community of such a project, adjacent to so many L A City Historic landmarks. I would appreciate being kept informed as planning for this proposed project in our neighborhood moves forward.

Thank you
Roland Souza
1338 West 24th St
Los Angeles Ca. 90007
323 804 6070
roland.e.souza@gmail.com

West Adams Heritage Association

February 28, 2013

Mr. Garrett Damrath, Senior Environmental Planner
Ms. Allison Morrow
Division of Environmental Planning Cal-Trans District 7
100 South Main Street
Los Angeles, CA 90012

Via email: Allison_Morrow@DOT.CA.GOV

Re: Notice of Preparation ("NOP") - Draft initial Study, interstate 110 Transit-way Connector Project (110 HOV/HOT off ramp to Figueroa Way, Los Angeles, CA)

Dear Mr. Damrath and Ms. Morrow:

The West Adams Heritage Association is comprised of over 350 households in the West Adams/University Park area. We routinely comment on land use applications and environmental documents on behalf of the Association members. The West Adams Heritage Association, founded in 1983, represents hundreds of residents of the historic West Adams section of Los Angeles, including many in University Park. Our area includes the city's largest concentration of Victorian and Craftsman homes, five of the city's Historic Preservation Overlay Zones, and a concentration of Los Angeles Historic Cultural Monuments. As time long stakeholders, WAHA was surprised to learn of the NOP the day prior to the comment deadline. The notice did not reach many of the interested parties and we request that the notice for the "NOP" be more widely circulated and the comment deadline be extended. We are pleased that Ms. Morrow has agreed to also consider comments from our members and others from publication notice of the NOP in our newsletter, which will be published shortly after February 28, 2013.

When this project was proposed in various iterations at a public meeting on May 8, 1990, which was held at St. Vincent's School, the gathering drew a wide range of community interests. A public meeting should again be held to provide input to Cal-Trans to insure that the preparer will be aware of the many pertinent factors, the wide array of significant historic resources, and serious and irreparable environmental damage that will occur if the project is constructed as proposed.

In fact, it was the extensive research done previously by Cal-Trans that determined the design of the 101 exit should not be constructed with a flyover, which at least one of the alternatives proposed. We draw your attention and request that you review the following documents which were so carefully prepared by Cal-Trans previously:

I-110 Transitway / Northern Terminus to Adams Boulevard / Initial Study &
Final Environmental Assessment (05/02/91) SCH No. 90010137 / 7-LA-100 P.M.
20.2/21.2 / 07221-110331

Harbor Freeway Transitway / 37th Street Ramps Supplemental Report 07-LA-110 /P.M. 18.8-20.2 / 07222-110321 Historic Property Survey and Finding of Effect / Diane Kane Architectural Historian May 1990

Northern Terminus to the I-11 Harbor Freeway Transitway / Supplemental Historic Architecture Survey Report / Diane Kane Architectural Historian P.M. 20.94-110331 December 15 1991

If anything, the awareness of the significance of the historic area and its resources has increased rather than decreased since the time of the documents previously prepared and referenced above. Your flyover proposal affects one of the most significant historic neighborhoods that has a wide array of historic resources including, but not limited to: St. Johns Episcopal Church, St. Vincent's Church, the Chester Place Historic District, the St. James Park National Register District, the 20th Street National Register District, the Flower Drive National Register District, the University Park Historic Preservation Zone, the North University Park Specific Plan, and numerous city cultural monuments.

We also draw your attention to the proposed Red Oak Project's E I R ENV-2007-4288-EIR which underscores the significance and fragility of this area. The developers realized that their project was not feasible in this environment.

Among the pertinent factors that should be considered include:

- The impacts of cutting off communities by introducing elevations that create barriers
- The impacts of light and shade on the buildings, neighborhoods, cultural settings, and environment
- The negative impact and degradation of the environment by proposing elevated structures and how they impact the quality of life of people and communities
- The acknowledged and prescribed goals of the south community plan regarding scale, size and compatible development that protects existing communities
- The need for adequate transportation alternatives to the automobile in an urban environment
- The need for green space in the area
- An understanding that the impacts of this proposed project has an area of impact ("APE") that includes a wide geographic area
- Analysis of the cumulative impacts from years of less than adequate traffic mitigation for the many projects in the area and its surroundings (Staples Center, Gateway, the Lorenzo Development, the Galen Center, University Village, the Figueroa Corridor Plan Amendment, and many others)
- Examine the proposed project in the context of the acknowledged strategy and goal of protecting existing neighborhoods from negative impacts of incompatible development
- Analysis of alternatives including a no project alternative and an underground alternative

- Understanding the character defining features of both the historic resources and of the neighborhoods
- Evaluating the impacts to Adams Boulevard as a designated scenic highway

For my closing remarks I would reiterate that this project conflicts with the adopted environmental plans and goals of the community in which it is located. This is an idea whose time has passed as we see the need for public transportation and creation of a livable city. I look forward to working with you in furtherance of community goals in finding suitable and environmentally sensitive ways to mitigate congestion while preventing serious and irreparable environmental harm to our community.

Sincerely

Jean Frost, Chair, Historic Preservation
West Adams Heritage Association
C/0 2341 Scarff Street
LA CA 90007
jfrost@earthlink.net
213 840-5998

Metro

PUBLIC NOTICE

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI) and Notice of Public Hearing for the Interstate 110 High-Occupancy Toll Lane Flyover Project

Caltrans

What's Being Planned?	The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Agency (Metro), proposes to construct an elevated off-ramp structure on Northbound Interstate 110 between 30th Street and Figueroa Street Overcrossing in the City of Los Angeles. The proposed work will have an effect on historic properties on or eligible for the National Register of Historic Places. Caltrans has evaluated whether adequate mitigation measures can be incorporated into the project plans.
Why This Ad?	Caltrans has studied the effects that the proposed project may have on the environment and community. The results of these studies are contained in an environmental document known as an Initial Study/Environmental Assessment (IS/EA). Caltrans intends to adopt a mitigated negative declaration/finding of no significant impact for this project. The purpose of this notice is to inform the public of its completion and availability to any interested individuals.
What's Available?	The Draft IS/EA is available for review online at http://www.dot.ca.gov/dist07/resources/envdocs/ and at the following public libraries: Jefferson Library (2211 W. Jefferson Blvd. Los Angeles), Vermont Square Branch Library (1201 W. 48th St. Los Angeles), Vernon Branch Library (4504 S. Central Ave). It is also available at Caltrans District 7 Office (100 S. Main Street, Los Angeles) on weekdays from 8:00 a.m. to 4:00 p.m.
Where Do You Come In?	Do you have any comments regarding the IS/EA? Would you care to make any other comments about the project? Please submit any written comments no later than **March 21, 2016** to: Mr. Garrett Damrath, Chief Environmental Planner Caltrans District 7, Division of Environmental Planning 100 South Main Street, MS 16A Los Angeles, CA 90012
When and Where?	A public hearing will be held to allow any interested individuals an opportunity to discuss the project with Caltrans staff. The public hearing will be held on **February 23, 2016** at **Orthopaedic Institute for Children, Andrew Norman Hall, 403 West Adams Blvd. Los Angeles, CA 90007 from 6:00 pm to 8:00 pm.** Individuals who require special accommodations are requested to contact the Department's Public Affairs Office at (213) 897-3656 at least 21 days in advance prior to the scheduled hearing date.
Contact	For additional information, please contact Allison Morrow at (213) 897-3247.

Thank you for your interest in this transportation project.

Metro

AVISO PÚBLICO

Aviso de disponibilidad del borrador del estudio inicial/evaluación ambiental (IS/EA) y aviso de intención para adoptar una declaración negativa mitigada/hallazgo de ningún impacto significativo (MND/FONSI) y aviso de audiencia pública para el proyecto de paso elevado de carril de peaje de alta ocupación de la autopista 110

Caltrans

¿Qué se está planificando?	El departamento de transporte de California (Caltrans), en colaboración con la Autoridad de Transportación Metropolitana del Condado de Los Ángeles (Metro), propone construir una estructura elevada de la rampa en dirección norte en la autopista 110 entre 30th Street y Figueroa Street en la ciudad de Los Ángeles. El trabajo propuesto tendrá un efecto sobre las propiedades históricas o será elegible para el registro nacional de lugares históricos. Caltrans ha evaluado si las medidas de mitigación adecuadas se pudieran incorporar en los planes del proyecto.
¿Por qué necesitamos este anuncio?	Caltrans ha estudiado los efectos que el proyecto quizás tenga sobre el medio ambiente y la comunidad. Los resultados de estos estudios están contenidos en un documento ambiental conocido como estudio inicial/evaluación ambiental (IS/EA). Caltrans se propone adoptar una declaración negativa mitigada/hallazgo de ningún impacto significativo para este proyecto. El propósito de este aviso es informar al público de su terminación y su disponibilidad para cualquier individuo interesado.
¿Qué está disponible?	El proyecto de IS/EA está disponible para revisión en línea en *http://www.dot.ca.gov/dist07/resources/envdocs/* y en las bibliotecas públicas siguientes: Jefferson Library (2211 W. Jefferson Blvd. Los Angeles), Vermont Square Branch Library (1201 W. 48th St. Los Angeles), Vernon Branch Library (4504 S. Central Ave). También está disponible en la oficina de Caltrans District 7 (100 S. Main Street, Los Angeles) de lunes a viernes de 8 de la mañana a 4 de la tarde.
¿Dónde interviene usted en esto?	¿Tiene comentarios sobre el IS/EA? ¿Le importaría hacer cualquier otro comentario sobre el proyecto? Por favor, envíe cualquier comentario por escrito, a más tardar el día **21 de marzo de 2016, a:** Mr. Garrett Damrath, Chief Environmental Planner Caltrans District 7, Division of Environmental Planning 100 South Main Street, MS 16A Los Angeles, CA 90012
¿Cuándo y dónde?	Habrá una audiencia pública para permitir que cualquier persona interesada tenga una oportunidad para hablar del proyecto con el personal de Caltrans. La audiencia pública se llevará a cabo el día **23 de febrero de 2016, en el Orthopaedic Institute for Children, Andrew Norman Hall, 403 West Adams Blvd., Los Angeles, CA 90007 de 6 a 8 de la tarde.** Las personas que requieran adaptaciones especiales deben ponerse en contacto con la oficina de asuntos públicos del Departamento al (213) 897-3656, al menos 21 días de antes de la fecha programada de la audiencia.
Contacto	Para obtener más información, póngase en contacto con Allison Morrow en el (213) 897-3247.

Gracias por su interés en este proyecto de transporte.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN, JR., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
100 South Main Street, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0703
FAX (213) 897-0685
TTY (213) 897-4937

Serious drought.
Help save water!

January 25, 2016

Agencies, Organizations, and
Individuals interested in the
I-110 High-Occupancy Toll Lane Flyover Project

File: 07-LA-110 PM 20.1/20.92
SCH No. 2013021002
I-110 High-Occupancy Toll
Lane Flyover Project
Adams Blvd to Figueroa Way

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

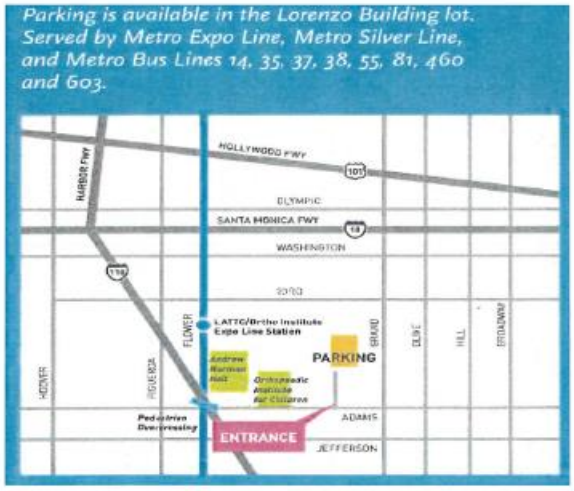
Pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), Caltrans has studied the effects that the proposed project may have on the environment and community. The results of those studies are contained in an environmental document known as a Draft Initial Study/Environmental Assessment (IS/EA). As a result of the Draft IS/EA, Caltrans intends to adopt a Mitigated Negative Declaration/Finding of No Significant Impact for this project. The purpose of this notice is to inform the public of its completion and availability to any interested individuals.

A public hearing will be held to allow interested individuals an opportunity to discuss the project with Caltrans staff. The public hearing will be held on:

Tuesday, February 23, 2016, 6:00PM to 8:00PM
Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

Individuals who require special accommodation are requested to contact the Caltrans Public Affairs Office at (213) 897-3656 at least 21 days prior to the scheduled hearing date. TDD users may contact the California Relay Service TDD line at (213) 897-4937.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"



The draft IS/EA may also be accessed online at http://www.dot.ca.gov/dist07/resources/envdocs/. A hard copy of the environmental document may also be viewed at the following public libraries:

Jefferson Library (2211 West Jefferson Boulevard, Los Angeles, CA 90018)
Vermont Square Branch Library (1201 West 48th Street, Los Angeles, CA 90037)
Vernon Branch Library (4504 S. Central Avenue, Los Angeles, CA 90011)

Please submit any written comments, no later than **Monday, March 21, 2016** to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

If you have any questions, please contact Allison Morrow at (213) 897-3247. Thank you for your interest in this important transportation project.

Sincerely,

RONALD J. KOSINSKI
Deputy District Director, Division of Environmental Planning
Caltrans District 7

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

ESTADO DE CALIFORNIA, AGENCIA DE TRANSPORTE DEL ESTADO DE CALIFORNIA EDMUND G. BROWN, JR., Gobernador

DEPARTAMENTO DE TRANSPORTE
DISTRICT 7, Division of Environmental Planning
100 South Main Street, Suite 100
LOS ANGELES, CA 90012-3606
TELÉFONO (213) 897-0703
FAX (213) 897-0685
TTY (213) 897-4937

Una sequía grave.
¡Ayude a ahorrar agua!

22 de enero de 2016

Agencias, organizaciones, y personas interesadas en el Proyecto de puente elevado del carril de peaje de alta ocupación del I-110

Archivo: 07-LA-110 PM 20.1/20.92
SCH No. 2013021002
Proyecto de puente elevado del carril de peaje de alta ocupación del I-110 de Adams Blvd a Figueroa Way

Aviso de disponibilidad del borrador del estudio inicial/evaluación ambiental (IS/EA) y Aviso de intención para adoptar una declaración negativa mitigada/hallazgo de ningún impacto significativo (ENM/FONSI)

El Departamento de transporte de California (Caltrans), en colaboración con la Autoridad de Transportación Metropolitana del Condado de Los Ángeles (Metro), propone construir una estructura elevada de la rampa en dirección norte en la autopista 110 entre 30th Street y Figueroa Street en la ciudad de Los Ángeles. La estructura propuesta eludiría las intersecciones congestionadas en Flower Street y Adams Boulevard y la rampa del peaje de alta ocupación (HOT) a Adams Blvd., conectando el tráfico del carril del peaje con Figueroa Street.

En virtud de la ley de calidad ambiental de California (CEQA) y la ley de política ambiental nacional (NEPA), Caltrans ha estudiado los efectos que el proyecto quizás tenga sobre el medio ambiente y la comunidad. Los resultados de estos estudios están contenidos en un documento ambiental conocido como el borrador de estudio inicial/evaluación ambiental (IS/EA). Como resultado del borrador IS/EA, Caltrans se propone adoptar una declaración negativa mitigada/hallazgo de ningún impacto significativo para este proyecto. El propósito de este aviso es informar al público de su terminación y su disponibilidad para cualquier individuo interesado.

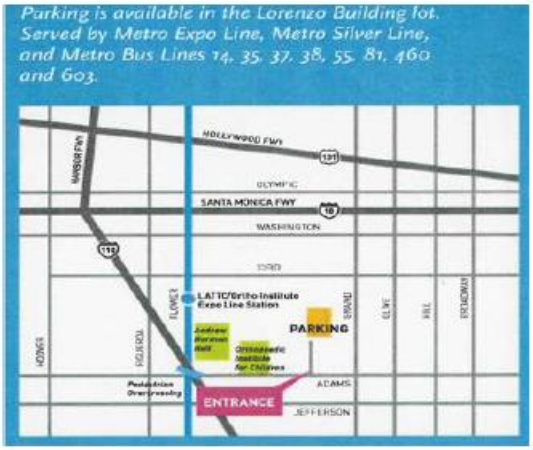
Habrá una audiencia pública para permitir que cualquier persona interesada tenga una oportunidad para hablar del proyecto con el personal de Caltrans. La audiencia pública se tomará a cabo el:

Martes 23 de febrero de 2016, de 6 a 8 de la tarde
Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Blvd., Los Angeles, CA 90007

Las personas que requieran adaptaciones especiales deben ponerse en contacto con la oficina de asuntos públicos de Caltrans al (213) 897-3656, al menos 21 días antes de la fecha programada

"Proporcionar un sistema de transporte seguro, sostenible, integrado y eficiente para mejorar la economía y calidad de vida de California"

de la audiencia. Los usuarios de TDD pueden comunicarse con la línea de California Relay Service TDD al (213) 897-4937.



El borrados también esta disponible en línea en http://www.dot.ca.gov/dist07/resources/envdocs/.
Una copia del documento ambiental también está en las bibliotecas públicas siguientes:

Jefferson Library (2211 West Jefferson Blvd., Los Angeles, CA 90018)
Vermont Square Branch Library (1201 West 48th St., Los Angeles, CA 90037)
Vernon Branch Library (4504 S. Central Ave., Los Angeles, CA 90011)

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Si usted tiene alguna pregunta, póngase en contacto con Allison Morrow en el (213) 897-3247.
Gracias por su interés en este proyecto de transporte.

Atentamente,

RONALD J. KOSINSKI
Deputy District Director, Division of Environmental Planning
Caltrans District 7

"Proporcionar un sistema de transporte seguro, sostenible, integrado y eficiente para mejorar la economía y calidad de vida de California"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Dr. Ed Hernandez
California State Senator, District 22
100 S. Vincent Ave. Ste. 401
West Covina, CA 91790

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Senator Hernandez,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

Pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), Caltrans has studied the effects that the proposed project may have on the environment and community. The results of those studies are contained in an environmental document known as a Draft Initial Study/Environmental Assessment (IS/EA). As a result of the Draft IS/EA, Caltrans intends to adopt a Mitigated Negative Declaration/Finding of No Significant Impact for this project. The purpose of this notice is to inform the public of its completion and availability to any interested individuals.

A public hearing will be held to allow interested individuals an opportunity to discuss the project with Caltrans staff. The public hearing will be held on:

Tuesday, February 23, 2016, 6:00PM to 8:00PM
Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Dr. Ed Hernandez
January 25, 2016
Page 2

Individuals who require special accommodation are requested to contact the Caltrans Public Affairs Office at (213) 897-3656 at least 21 days prior to the scheduled hearing date. TDD users may contact the California Relay Service TDD line at (213) 897-4937.

Enclosed is a compact disc copy of the Draft IS/EA for your review. The Draft IS/EA may also be accessed online at http://www.dot.ca.gov/dist07/resources/envdocs/. A hard copy of the environmental document may also be viewed at the following public libraries:

Jefferson Branch Library (2211 West Jefferson Boulevard, Los Angeles, CA 90018)
Vermont Square Branch Library (1201 West 48th Street, Los Angeles, CA 90037)
Vernon Branch Library (4504 S. Central Avenue, Los Angeles, CA 90011)

Please submit any written comments, no later than **Monday, March 21, 2016** to:

Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

If you have any questions, please contact Ronald Kosinski at (213) 897-0703 or by e-mail at ron.kosinski@dot.ca.gov. Thank you for your interest in this important transportation project.

Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Barbara Boxer
U.S. Senator
312 North Spring Street, Suite 1748
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Senator Boxer,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Barbara Boxer
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Adrin Nazarian
California State Assembly Member, District 46th
6150 Van Nuys Boulevard, Suite 300
Van Nuys, CA 91401

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Senator Nazarian,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Adrin Nazarian
January 25, 2016
Page 2

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Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

If you have any questions, please contact Ronald Kosinski at (213) 897-0703 or by e-mail at ron.kosinski@dot.ca.gov. Thank you for your interest in this important transportation project.

Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Dianne Feinstein
U.S. Senator
11111 Santa Monica Blvd. Suite 915
Los Angeles, CA 90025-3343

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Senator Feinstein,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Dianne Feinstein
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Ted Lieu
US House of Representatives, District 33
5055 Wilshire Boulevard, Suite 310
Los Angeles, CA 90036

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Congressman Lieu,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Ted Lieu
January 25, 2016
Page 2

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Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

If you have any questions, please contact Ronald Kosinski at (213) 897-0703 or by e-mail at ron.kosinski@dot.ca.gov. Thank you for your interest in this important transportation project.

Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Eric Garcetti
Mayor, City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Mayor Garcetti,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Eric Garcetti
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Gil Cedillo
City Council Member, 1st District
City of Los Angeles
200 N. Spring Street Room 460
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear The Honorable Gil Cedillo,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Andrew Norman Hall
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The Honorable Gil Cedillo
January 25, 2016
Page 2

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I-110 High-Occupancy Toll Lane Flyover Project
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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Curren D. Price, Jr.
City Council Member, 9th District
City of Los Angeles
200 N. Spring Street, Room 420
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Councilmember Price,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Curren D. Price, JR.
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Jose Huizar
Los Angeles Council Member, 14th District
City of Los Angeles
200 N. Spring Street, Room 465
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Councilmember Huizar,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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A public hearing will be held to allow interested individuals an opportunity to discuss the project with Caltrans staff. The public hearing will be held on:

Tuesday, February 23, 2016, 6:00PM to 8:00PM
Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Jose Huizar
January 25, 2016
Page 2

Individuals who require special accommodation are requested to contact the Caltrans Public Affairs Office at (213) 897-3656 at least 21 days prior to the scheduled hearing date. TDD users may contact the California Relay Service TDD line at (213) 897-4937.

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Vermont Square Branch Library (1201 West 48th Street, Los Angeles, CA 90037)
Vernon Branch Library (4504 S. Central Avenue, Los Angeles, CA 90011)

Please submit any written comments, no later than **Monday, March 21, 2016** to:

Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

If you have any questions, please contact Ronald Kosinski at (213) 897-0703 or by e-mail at ron.kosinski@dot.ca.gov. Thank you for your interest in this important transportation project.

Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Hilda Solis
Los Angeles County, Board of Supervisors, 1st District
856 Kenneth Hahn Hall of Administration, 500 West Temple St.
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Supervisor Solis,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Hilda Solis
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Mark Ridley –Thomas
Los Angeles County Board of Supervisors, 2nd District
866 Kenneth Hahn Hall of Administration,
500 West Temple Street, Room 866
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Supervisor Ridley –Thomas,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Andrew Norman Hall
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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Mark Ridley –Thomas
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Xavier Becerra
U.S. House of Representatives, 34th District
350 South Bixel Street, Suite 120
Los Angeles, CA 90017

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Congressman Becerra,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Xavier Becerra
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
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Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Kevin de Leon
Senate President pro Tempore
California State Senate, District 24
1808 West Sunset Blvd.
Los Angeles, CA 90026

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Senator de Leon,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Kevin de Leon
January 25, 2016
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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Miguel Santiago
State Assembly Member, District 53
320 West 4th Street Room 1050
Los Angeles, CA 90013

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Assemblymember Santiago,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Tuesday, February 23, 2016, 6:00PM to 8:00PM
Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

The Honorable Miguel Santiago
January 25, 2016
Page 2

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Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0362
FAX (213) 897-0360
TTY 711
www.dot.ca.gov

Serious Drought.
Help save water!

January 25, 2016

The Honorable Marqueece Harris-Dawson
City Council Member, 8th District
City of Los Angeles
200 N. Spring St., Room 450
Los Angeles, CA 90012

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

Dear Councilmember Harris-Dawson,

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

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Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

The Honorable Marqueece Harris-Dawson
January 25, 2016
Page 2

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Caltrans District 7, Division of Environmental Planning
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

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Sincerely,

Carrie L. Bowen

CARRIE L. BOWEN
District Director

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

SHPO Finding of Effect Letter

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

October 13, 2015 Reply To: FHWA_2015_0406_001

Kelly Hobbs, Chief
Section 106 Coordination Branch
Caltrans Division of Environmental Analysis
PO Box 942874
Sacramento, CA 94274-0001

Re: Finding of Effect for the Proposed Interstate 110 Flyover Project, Los Angeles County, CA

Dear Mr. Hobbs:

You are consulting with me about the subject undertaking in accordance with the January 2014 *First Amended Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California* (PA).

Caltrans, in conjunction with Los Angeles County Transportation Agency (Metro), proposes to build an elevated, northbound off-ramp on I-110 between 30th Street and the Figueroa Street Overcrossing (Postmiles 10.10/20.92). The proposed structure would bypass the intersections at Flower Street and Adams Boulevard and the North Bound I-110 High Occupancy Toll (HOT) off ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street. A full project description can be found on page three and four of the Finding of Effect document and a depiction of the area of potential effect (APE) can be found on pages 4-8.

Identification efforts for the project resulted in the determination that there are five historic properties located within the APE for the project.

Caltrans has found that the undertaking will have an adverse effect on St. John's Episcopal Church, located at 510-518 West Adams Boulevard in Los Angeles. The flyover has the potential to obscure views towards and from St. John's. I have **no objections** to this finding.

Caltrans has also found that the undertaking will have no adverse effect on the St. John's Parish House. Caltrans states that although the flyover would be visible from the east, south and north elevations of St. John's Parish House, the effect would not be adverse because the building was moved and reoriented on the church property shortly after it was built, and none of the views to or from the historic property are original to the building when it was originally constructed before it was moved. I **object** to this finding.

When the Parish House was found eligible in September of 2002, it was due to its association with the church and the architects Pierpont and Walter S. Davis. The documentation, as well as the SHPO letter, acknowledge that the Parish House is part of the church property. Given the heavy association between the Church and the Parish House and that they are located next door to each other; I think a finding of adverse effect for this property would be more appropriate.

Caltrans has also found that the undertaking will have no effect on the following properties:

- Automobile Club of Southern California – 2601 S Figueroa Street, Los Angeles
- St. Vincent de Paul Church – 601 West Adams Boulevard, Los Angeles

Mr. Hobbs
October 13, 2015
Page 2 of 2

- Thomas Stinson House, 2421 South Figueroa Street, Los Angeles

Caltrans found that there would be no direct impacts to these buildings. Although the flyover will be visible from the buildings it is Caltrans' opinion that the setting is so altered that there will be no effect to the properties. Based on my review of the submitted documentation I **object** to this finding. Given the visibility of the flyover from these buildings I do believe that the undertaking will have an effect, although I do not think it will be adverse due to the extensive changes that have occurred to the setting in the vicinity of these buildings.

Thank you for considering historic properties during project planning. If you have any questions, please contact Natalie Lindquist of my staff at (916) 445-7014 or email at natalie.lindquist@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

FHWA Project Level Conformity Letter

U.S. Department of Transportation
Federal Highway Administration

Federal Highway Administration
California Division

650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001
(916) 498-5008 (fax)

June 23, 2016

In Reply Refer To:
HDA-CA

Carrie Bowen
District Director
California Department of Transportation, District 7
100 South Main Street, Suite 100
Los Angeles, CA 90012-3606

Attention: Andrew Yoon

SUBJECT: Project Level Conformity Determination for the Interstate 110 High Occupancy Toll Flyover Connector Project (FTIP ID No. LA0G086)

Dear Ms. Bowen:

On June 13, 2016, the California Department of Transportation (Caltrans) submitted to the Federal Highway Administration (FHWA) a complete request for a project level conformity determination for the Interstate 110 High Occupancy Toll Flyover Connector Project. The project is in an area that is designated Non-Attainment or Maintenance for Nitrogen Dioxide (NO_2) Carbon Monoxide (CO), Ozone and Particulate Matter (PM_{10}, $PM_{2.5}$).

The project level conformity analysis submitted by Caltrans indicates that the project-level transportation conformity requirements of 40 CFR Part 93 have been met. The project is included in the Southern California Association of Governments' (SCAG) current Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP), as amended. The design concept and scope of the preferred alternative have not changed significantly from those assumed in the regional emissions analysis.

As required by 40 CFR 93.116 and 93.123, the localized $PM_{2.5}$ and PM_{10} analyses are included in the documentation. The analyses demonstrate that the project will not create any new violations of the standards or increase the severity or number of existing violations.

Based on the information provided, FHWA finds that the Interstate 110 High Occupancy Toll Flyover Connector Project conforms with the State Implementation Plan (SIP) in accordance with 40 CFR Part 93.

If you have any questions pertaining to this conformity finding, please contact Joseph Vaughn at (916) 498-5346 or by email at Joseph.Vaughn@dot.gov.

Sincerely,

For : Vincent P. Mammano
Division Administrator

Public Involvement

As mentioned earlier in section 2.1.5 of this document, Caltrans held an open house/public input meeting on May 3, 1990. This meeting was held because of local concerns following the circulation of the I-110 Transitway Northern Terminus to Adams Boulevard Initial Study/Environmental Assessment.

The recommended alternative (Northbound HOV off-ramp to Figueroa Street and Southbound HOV On-ramp from realigned Flower Street, south of 23rd Street with the demolition and reconstruction of the Flower Street Overcrossing) was the main subject. Some of the primary features of the alternative were as follows:

- An elevated structure Bus/HOV transitway, an elevated HOV northbound off-ramp to Figueroa St. just south of 23rd St., and an elevated HOV southbound on-ramp from a realigned Flower St. south of 23rd St. just west of the Orthopedic Hospital (2400 South Flower St.).
- The northbound HOV off-ramp structure would diverge from the mainline transitway and pass over the Adams Blvd. overcrossing, the southbound HOV on-ramp structure, and the realigned Flower St. overcrossing. Likewise, the southbound HOV on-ramp structure would pass over the Adams Blvd. overcrossing and merge the mainline transit way structure south of 27th St.

There was considerable public opposition to implementing the recommended alternative. Some of the major concerns expressed by attendees were as follows: opposition to widening Figueroa St., circulation impacts due to the increased traffic, Figueroa St. becoming unsafe for pedestrians, harm to historic properties, noise impacts, air quality, aesthetics, and vibration impacts, opposition to the conclusions in the environmental document, earthquake impacts on structures, and lack of public involvement.

The meeting was adjourned with the understanding that Caltrans would develop other alternatives for the Northern Terminus proposal. After the open house/public input meeting Caltrans met several times with hospital officials, community groups, and the City of Los Angeles Department of Transportation (LADOT) to work out modifications to the design amenable to all concerned. Several alternatives were developed, but were later found infeasible. Another concern was voiced, when the Los Angeles County Transportation Commission (LACTC) was unable to make a firm commitment to a future Light Rail Transit Line on Flower St. This made it difficult for Caltrans and LACTC to develop a mutually usable design configuration for the Flower St. Bridge. Because of these issues and concerns, the design configurations were dropped from further consideration.

In February of 2013, the community was given the opportunity to comment on the Notice of Scoping/ Initiation of Studies for the project. Comment letters were received and have been taken into consideration during the design of the project as well as the environmental evaluation process. A courtesy meeting was initiated with St. John's Cathedral Church clergy due to the proximity of the historical church to the proposed project. This meeting was held on October 7, 2014 at in the Caltrans District Office.

Per the request of St. John's Church Leaders and other interested Stakeholders, on December 3, 2014 Caltrans and Metro presented information on the project. The presented information was preliminary. The information provided at this meeting included funding, history of the project as

well as purpose and need, project development/environmental process, the proposed Build Alternative, traffic, visual resources overview, historical resources (Section 106 Compliance), and the project schedule. Follow-up coordination occurred throughout the project development process.

On April 22, 2015, Caltrans held a Section 106 Consulting Party Meeting at in the Caltrans District Office. This meeting provided approved Consulting Parties the opportunity to provide input on potential design features on the proposed elevated structure.

Caltrans is working closely with other team members to ensure transparency throughout the project development process as well as the environmental process. Public outreach is a part of our environmental process, and Caltrans will continue to provide opportunities for the public to comment on this project to ensure public involvement.

A public hearing was held on Tuesday, February 23, 2016, 6:00PM to 8:00PM at the Orthopaedic Institute for Children Andrew Norman Hall 403 West Adams Boulevard, Los Angeles, CA 90007. Interested parties were given the opportunity to comment on the proposed project. A presentation was given by Caltrans staff to help the public understand the project and the environmental process. The Project Development Team provided handouts to help answer questions.

On April 12, 2016, an in-house meeting was held with SHPO, California Office of Historic Preservation (OHP) and Caltrans Headquarters (HQ) staff, and ACHP staff. Caltrans convened an informal meeting in field later that day with consulting parties, State Historic Preservation Officer, California Office of Historic Preservation and Advisory Council and HQ.

On August 19, 2016, Caltrans transmitted the draft MOA to consulting parties and requested comments The ACHP declined consultation that same day. A letter response was received from WAHA on September 6, 2016 offering the following recommendations as mitigation: “The only acceptable mitigation step should be support of the no build alternative and examining a surface street solution that improves traffic flow without the impacts of a concrete flyover” (Jean Frost to Francesca Smith). No comments were made regarding the content of the draft Memorandum of Agreement. The MOA was revised by HQ staff on January 3, 2017 and was transmitted via e-mail to consulting parties the following day for comments.

On January 20, 2017 Caltrans held a meeting with consulting parties and SHPO, OHP staff, a CPF representative and HQ on the telephone. Ken Bernstein, manager of City of Los Angeles Office of Historic Resources attends and asks to be included in future discussions. St. Johns’ Cathedral invited their development consultant and developer. The developer verbally disclosed proposed plans in the meeting for a large, market-rate hotel complex to be built on St. John’s Episcopal Church block surrounding the existing church. St. John’s representative, Rev. Dan Ade stated that they would have “no use” for preservation plans unless they were completed by September 2017.

After consideration of St. John’s Episcopal Church rejection of preservation plans for St. John’s Episcopal Church and St. John’s Episcopal Church Parish Hall, the MOA was revised on August 18, 2017 by deletion of the stipulation that included those documents’ preparation. That same day, Caltrans transmitted those revisions to the draft MOA to consulting parties, HQ and OHP staff and requested additional ideas regarding mitigation measures with a deadline of September 1, 2017.

After no responses were received, Caltrans sent an e-mail extending the deadline for comments to September 6, 2017. In response, WAHA sent an e-mail to Caltrans staff on September 5, 2017 that stated "The more recent draft remains unacceptable and WAHA's previous comments remain valid" (Jean Frost to Francesca Smith). No other responses were received.

In a conference call among Caltrans District 7 staff and OHP staff in January 2018, one additional meeting with consulting parties was recommended. That meeting took place on January 31, 2018, and an additional phone application (app) mitigation measure intended to be a public benefit was discussed. Based on consulting party comments, the area of properties included in the app was increased. Consulting parties were afforded two additional weeks to recommend mitigation measures, ending on February 14, 2018. No recommendations were received during that two-week period regarding additional mitigation measures and the revised draft MOA with a larger area for the phone app mitigation measure was circulated to signatory parties, invited signatories and consulting parties. No comments have been received.

Community Issues and Attitudes

Some of the major concerns voiced by interested parties are potential effect of the proposed project on historical properties, lighting and signage, cumulative impacts specifically with MyFig Project, compliance with NEPA & CEQA, noise, vibrations, traffic, air quality, quality of life, desire for alternatives other than driving, underground alternatives, environmental pollution, visual impacts, changes in property values, impacts to bus services, and the space under the flyover structure potentially becoming encampments of homeless persons as well as trash dumping. Some groups have shown opposition to the Build Alternative. These groups include St. John's Cathedral Church staff, West Adams Heritage Association, North University Park Community Association, University Park Historic Preservation Overlay Zone Board, and Adams Dockweiler Heritage Organizing Committee.

List of Response Codes for Public Comments

Commenters' Affiliation	Response Code	Commenter Name	Date
Stakeholder	Bevan	Mark Bevan	2/10/16
Resident of West Adams	Brown	Shelley Brown	3/3/16
LACBC	Bruins	Eric Bruins	2016
Stakeholder	Sanderson	Joseph Sanderson	2/27/16
County of Los Angeles	Johnson	Kevin T. Johnson	3/3/16
Stakeholder	Bottjer	David J. Bottjer	2/26/16
Figueroa Corridor	Gibson	Steve Gibson	3/14/16
Los Angeles Unified School District	LAUSD	Eimon Smith	3/29/16
Stakeholder	Hilburg	Lore Hilburg	4/4/16
Stakeholder	Arlington	Audrey Arlington	2016
City of Los Angeles	Hunt	Michael C. Hunt	3/24/16
WAHA	WAHA(Frost)	Jean Frost	3/18/16
ADHOC	ADHOC	Jim Childs	3/21/16
University Park Historic Preservation Overlay Zone	HPOZ	Jean Frost	3/21/16
Council Member, 9th District	Price	The Honorable Curren D. Price, JR.	3/18/16
Stakeholder	Carter	Patsy Carter	2/22/16

Commenters' Affiliation	Response Code	Commenter Name	Date
South Coast Air Quality Management District	Wong	Jillian Wong	3/18/16
Stakeholder	Carter-Davis	Lisa Carter-Davis	2016
Stakeholder	Arnold	John Arnold	3/21/16
National Trust for Historic Preservation	Sanada	Kevin Sanada	3/21/16
NUPCA	NUPCA	Laura Meyers	3/21/16
Empowerment Congress North Area Neighborhood Development Council	NANDC	Andrea Canty	2016
Stakeholder	Mikesell	Stephen D. Mikesell	3/16/16
Council Member First District	Cedillo	The Honorable Gilbert A. Cedillo	2/23/16
Stakeholder	Veles	Sara Velas	3/14/16
Episcopal Diocese of Los Angeles	Leslie	Dr. Joanne Leslie	2016
Stakeholder	Coyne	Kelly Coyne	2016
St. John's Church	Sanford	Beatrice Sanford	2016
St. John's Church	Russell	Jeffery Russell	2016
Stakeholder	Villaume	Nate Villaume	2016
St. John's Church	Stepheniaj	Isaac Stepheniaj	2016
Stakeholder	Azri'el	Yosef Azri'el	2/23/16
Stakeholder	Unknown	Unknown	2016

Commenters' Affiliation	Response Code	Commenter Name	Date
St. John's Church	Uhler	Karen Uhler	2016
St. John's Church	Lincoln	Valaria M. Lincoln	2016
St. John's Church	Mchellan	Jeffery C. Mchellan	2016
St. John's Church	Lathos	Dominic Lathos	2016
St. John's Church	Soto	Edgar Soto	2016
St. James Church	Roskam	Rev. Catherine Roskam	2016
Metro	Metro	Metro	2016
California Preservation Foundation	Heitzman	Cindy L. Heitzman	4/21/16
Los Angeles Conservancy	Fine	Adrian Scott Fine	5/18/16
St. John's Church	St. John's	Rev. Daniel Ade and Rev. Mark Kowalewski	5/18/16
Stakeholder	Souza	Roland Souza	5/18/16
WAHA	Mogul(WAHA)	Mitzi March Mogul	5/18/16
WAHA	Childs(WAHA)	Jim Childs	5/17/16
WAHA	Fajnor Traffic Comment Letter 1	Craig Fajnor	2016
WAHA	JF	Jean Frost	5/18/16
Stakeholder	Yip	Andrew Fung Yip	2/25/16
WAHA	Mogul	Mitzi March Mogul (oral comment)	2/23/16
California Preservation Foundation	Minteer	Amy Minteer (oral comment)	2/23/16

Commenters' Affiliation	Response Code	Commenter Name	Date
St. John's Church	Gibson	Collin Gibson (oral comment)	2/23/16
Stakeholder	Gutman	Segio Gutman (oral comment)	2/23/16
Office of Council Member Gil Cedillo	Gubatan	Gerald Gubatan (oral comment)	2/23/16
St. John's Church	Kowalewski	Father Mark Kowalewski (oral comment)	2/23/16
St. John's Church	Ade	Father Daniel Ade (oral comment)	2/23/16
St. John's Church	Rubens	Jack Rubens(oral comment)	2/23/16
Council District 9 Council Member Price	Rosauro	Bryce Rosauro (oral comment)	2/23/16
Stakeholder	Collis	Shannon Collis (oral comment)	2/23/16
Stakeholder	Malan	Mr. Malan (oral comment)	2/23/16
Stakeholder	Davis	Lisa Davis (oral comment)	2/23/16
WAHA	Frost	Jean Frost (oral comment)	2/23/16
WAHA	Childs	Jim Childs(oral comment)	2/23/16
Figueroa Corridor Business and Improvement District	Aulenta	Aaron Aulenta (oral comment)	2/23/16
Stakeholder	Wen	James Wen (oral comment)	2/23/16
St. John's Church	Black	Irvelle Black	2/23/16
Stakeholder	Souza	Roland Souza (oral comment)	2/23/16
North University Park Community Association	Meyers	Laura Meyers(oral comment)	2/23/16
NUMPCA	Florio	Thomas Florio(oral comment)	2/23/16

Commenters' Affiliation	Response Code	Commenter Name	Date
North Area Neighborhood Development Council	Shears	Brett Shears (oral comment)	2/23/16
St. John's Church	Tracey	Tracey(oral comment)	2/23/16
Stakeholder	Kim	Mr. Kim (oral comment)	2/23/16
St. James Church	Roskam	Rev. Katherine Roskam (oral comment)	2/23/16
New Design Charter School	Smith	Jim Smith(oral comment)	2/23/16
St. John's Church	Knutzen	Erik Knutzen(oral comment)	2/23/16
Episcopal Diocese of Los Angeles	Williams	Robert Williams (oral comment)	2/23/16
St. John's Church	Lee	Georgia Lee (oral comment)	2/23/16
Stakeholder	McDowell	Ruben McDowell (oral comment)	2/23/16
Los Angeles Conservancy	Fine	Adrian Scott Fine (oral comment)	2/23/16
St. John's Church	Alferez	Sergio Alferez (oral comment)	2/23/16
Stakeholder	Velas	Sara Velas (oral comment)	2/23/16
L.A. Chamber of Commence	Rascone	Sarah Rascone (oral comment)	2/23/16
Fixing Angelenos Stuck in Traffic	Norton	Hilary Norton (oral comment)	2/23/16
Los Angeles County Business Federation	Battan	Dustan Battan (oral comment)	2/23/16
St. John's Church	Marty	Cynthia Marty (oral comment	2/23/16
Stakeholder	Azriel	Yosef Azriel (oral comment)	2/23/16
Stakeholder	Carter	Ms. Carter(oral comment)	2/23/16

Commenters' Affiliation	Response Code	Commenter Name	Date
St. John's Church	Stephenrej	Isaac Stephenrej (oral comment)	2/23/16
St. John's Church	Mawhorter	Ms. Mawhorter (oral comment)	2/23/16

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b e v a n
980 South Madison Avenue
Pasadena, CA 91106
626.577.2535
bevan@sbcglobal.net

Wednesday, February 10, 2016

Mr. Garrett Damrath,
Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Fast Trak account # 67992

Dear Damrath,

Build it and they will come.

Please ad me to your list of supporters. It will be a great addition to the lanes.
The present exit at Adams is a mess and dangerous. Familiar? → ←

Bevan 1

Good luck I hope it gets approved and you build it on a FAST Track

Sincerely,

Mark

Mark H. Bevan
Office: 310-533-3865

Bevan 1: The commenter's support for the project is noted.

Moawad, Sally F@DOT

From: Damrath, Garrett K@DOT
Sent: Thursday, March 03, 2016 9:07 AM
To: Moawad, Sally F@DOT
Cc: Morrow, Allison A@DOT
Subject: FW: Flyover lane

Here's another.

Sincerely,

Garrett Damrath
Chief Environmental Planner
Division of Environmental Planning
Caltrans, District 7
213 897-9016

-----Original Message-----
From: Shelley Brown [mailto:curiousr@me.com]
Sent: Friday, February 26, 2016 7:37 PM
To: Damrath, Garrett K@DOT
Subject: Flyover lane

I would like to submit my opposition to the proposed flyover lane. I have always enjoyed taking Adams from the westside to downtown - and the corner with the Cathedral and the Auto Club building is the best part. It seems that the proposal does nothing to preserve the historic character of that corner. Brown 1

Thank you,
Shelley Brown
Resident of West Adams

Brown 1: The commenter's opposition to the project is noted. The comment is considered the commenter's opinion. Further, this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

With respect to preserving the historical character, refer to section 2.1.10 of the environmental document for a discussion of avoidance, minimization and/or mitigation measures. Further, Caltrans has prepared a Memorandum of Agreement to address effects.

LACBC
Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
Facsimile 213.629.2269
www.la-bike.org

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
100 South Main Street, MS 16A
Los Angeles, California 90012

I-110 High-Occupancy Toll Lane Flyover Project
SCH No. 2013021002

Dear Mr. Damrath,

The Los Angeles County Bicycle Coalition (LACBC) has reviewed the I-110 High-Occupancy Toll Lane Flyover Project Draft Initial Study/Environmental Assessment (IS/EA) and offers the following comments. As you are aware, the proposed project intersects with the MyFigueroa streetscape project, which includes the City of Los Angeles' first curb-protected bike lane. Many stakeholders along the Figueroa corridor, including LACBC, have worked diligently over the past decade to make Figueroa a world-class street for bus riders, bicyclists, and pedestrians. We would be concerned about any project that could degrade the experience of walking and biking along Figueroa. LACBC withholds judgment about whether this project would in fact have significant impacts on the walking and biking environment of Figueroa Street, but finds that the IS/EA lacks sufficient information to make this determination. Bruins 1

Cumulative Impact with MyFigueroa Project Not Evaluated

The proposed project would facilitate the direct offloading of freeway traffic onto Figueroa Street, which is about to undergo a significant reduction in vehicular capacity in order to better accommodate multimodal travel by bus, bike, and walking. The purpose of this project is to reduce delay and provide for additional traffic capacity on the I-110 HOT Lanes. The IS/EA fails to evaluate whether the project would increase vehicular volumes on Figueroa and therefore result in a cumulative impact when combined with the impact of the planned road diet. (The Climate Change analysis on p.230 specifically contemplates that the project will result in additional vehicular traffic volumes.) MyFigueroa was carefully designed to maximize bicycle and pedestrian mobility while avoiding unacceptably severe impacts to vehicular delay. Additional traffic on this street could affect MyFigueroa's future evaluation and public perception of its success and therefore undermine future support for similar complete streets projects in the City of Los Angeles. Cumulative traffic impacts should be disclosed so that MyFigueroa doesn't bear the blame for delay caused by this project. Bruins 2 Bruins 3

Insufficient Detail to Assess Impacts to Figueroa Protected Bike Lane

Of greater concern, the future protected bike lane on Figueroa is one of the City of Los Angeles' first on-street bicycle facilities designed for people of all ages and abilities. Maintaining the integrity of this low-stress experience for bike riders is paramount for the overall success of the MyFigueroa Bruins 4

LACBC

project. To avoid impacts to this experience, it is critical to minimize or eliminate unsignalized conflicts between bicycle traffic and vehicular traffic. Bruins 4

The IS/EA contains no design detail of how the proposed project will intersect with the protected bike lane on Figueroa. It is therefore impossible for LACBC to make a finding on whether or not the project would have a significant impact. LACBC finds that in order for the project to not create a significant impact on the safety of nonmotorized travelers, the flyover must be signalized at its intersection with Figueroa Street and that traffic on Figueroa Street, including bicyclists in the protected bike lane, must have signal priority over flyover traffic. Bruins 5

Any alternative configuration would cause an unacceptable degradation of the bicycle and pedestrian environment on Figueroa Street. The IS/EA is deficient for not analyzing this potential impact and not identifying mitigation measures. Mitigation Measure P&B-1 only addresses relatively minor pedestrian and bicycle circulation impacts on Figueroa Way, but overlooks the much more important potential for impacts on Figueroa Street.

LACBC looks forward to reviewing additional information to allay the concerns outlined above. We are confident that the project would improve connectivity for transit users and that potential impacts to bicyclists and pedestrians can be mitigated.

If you have any questions about these comments, I can be reached at (213) 629-2142 ext. 127 or eric@la-bike.org. Thank you for your consideration.

Sincerely,

Eric Bruins
Planning & Policy Director

Bruins 1: The Caltrans Design Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will complement MyFig Project. One of the major mitigation measures associated with this project is to re-design Figueroa Way into a pedestrian and bicycle corridor, therefore, Caltrans is encouraging a more pedestrian and bicycle friendly area. The traffic at the intersection of Figueroa Way and Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians.

Bruins 2: The Project Development Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will complement MyFig Project.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. Enhancing traffic flow at this location will induce travel demand by encouraging drivers to use the new facility. In the traffic study, Caltrans considered a 20% increase in traffic for future analysis, even though, MyFig Project will discourage some motorists to use the proposed ramp to access Figueroa Street. MyFig Project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

Bruins 3: The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. Therefore, arterial LOS analysis on Adams Blvd., Figueroa Street, Figueroa Way, 23rd Street is not necessary since the traffic volume will remain relatively the same.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a “STOP” controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: Also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

Cumulative traffic impacts are not anticipated because Traffic Management Plan (TMP) will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

At the regional level, the proposed project is included in 2016 RTP. Thus the cumulative impacts from the proposed project at the regional level have been accounted for under the program Initial Study/Environmental Assessment Report of the RTP and the proposed project would not result in cumulative impacts at the regional level.

At the local level, the proposed project would improve the operational efficiency and safety of the studied intersections discussed in section 2.1.8. Thus, the build conditions would provide an improvement in delay times at intersections analyzed versus the no-build conditions. Because the proposed project would have a beneficial impact on traffic, adverse cumulative impacts are not anticipated once the project is operational.

However, construction activities for one or more of the related projects in the area could result in temporary, localized, site-specific disruptions, including partial and/or complete street and lane closures and detours. If the activities occur at the same time, this could cumulatively increase response times for emergency vehicles during construction. Potential disruptions to emergency services could be avoided through implementation of minimization measure T-1 described in section 2.1.8. Further, the preparation of a TMP would take into consideration other projects in the area.

Bruins 4: The traffic at the intersection of Figueroa Way and S. Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians. The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: Also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

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- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

Bruins 5: Coordination with the City of Los Angeles's MyFig Project Team is ongoing to ensure that the design details of the proposed project will complement MyFig Project. Design details of how the proposed project will intersect with the protected lane on Figueroa Street will be developed in the design phase of the project, but Figure 30 section offers a preliminary design that is currently being considered. Impacts to the bicycle and pedestrian environment on Figueroa Street is not anticipated as the commenter suggests because the traffic at the intersection of Figueroa Way and Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

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Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, and if you have any questions please contact the City of Los Angeles.

From: Joseph Sanderson [mailto:joseph.sanderson@gmail.com]
Sent: Saturday, February 27, 2016 5:53 PM
To: Damrath, Garrett K@DOT
Subject: Comment re Proposed I-110 Initial Study and Mitigated Negative Declaration - OPPOSE

Mr. Damrath,

I am writing to comment on the proposed I-110 Initial Study and Mitigated Negative Declaration, which systematically ignores a number of serious environmental impacts that cannot be cured through mitigation measures. The MND is thus inadequate, and an EIR is required. Sanderson 1

First, the proposed MND describes "consolidating" bus stops as a mitigating measure. The elimination of some bus stops, requiring pedestrians to walk further - and through an area that will be made more unpleasant by the proposed freeway ramp - is not a mitigation measure but itself a serious adverse impact. The impact will be especially severe on senior and disabled passengers. Sanderson 2

Second, the impacts on St. John's Episcopal Church are not mitigated beyond the threshold of significance by the proposed mitigation measures. A few historical signs do not change the fact that the proposed project will change the church's historic setting, and views of the church will also be adversely impacted. A full EIR/EIS is required to analyze these significant impacts. Sanderson 3

Third, by encouraging driving over alternative means of transportation, the project will likely cause serious impacts to air quality and increase vehicle miles traveled. These impacts are likely to be beyond the threshold of significance and none of the currently proposed mitigation measures would reduce them. I strongly urge CalTrans, Metro, and FHWA to adopt additional mitigation measures such as funding increased bus service on the Silver Line or improvements to the Expo Line to improve air quality and reduce VMT. Sanderson 4

Fourth, CalTrans' assertion that there are no environmental justice impacts is incorrect. The proposed project is located in an area that is disproportionately non-white and transit-dependent - and a community that was torn apart when the freeway was constructed in the first place because decades ago planners did not care about environmental justice. Building more freeway simply exacerbates those environmental justice impacts by making this community *again* suffer more air pollution and vehicle noise. Sanderson 5

1

Finally, the presence of more fast-moving vehicles in an area prioritized for the MyFig protected bikeway and pedestrian enhancements creates a serious adverse impact on local transportation plans, as well as endangering safety. This impact is not analyzed in the proposed IS/MND **at all**, let alone with the hard look that CEQA and NEPA require, despite CalTrans's admission that several stakeholders raised this concern during scoping meetings. Sanderson 6

I urge you **not to adopt** the proposed IS/MND, and to prepare a full environmental impact report. Sanderson 7

Sincerely,

Joseph M. Sanderson

810 S. Spring St. Apt. 901, Los Angeles, CA 90014

Sanderson 1: The commenter's opinion is noted. The topics that have been evaluated in the environmental document are:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)
- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography
- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Further, the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Sanderson 2: The Metro/OCTA stop on Figueroa Way will be relocated and consolidated with the existing stop on Figueroa Street and 23rd Street. As this shift represents a distance of only 0.2 miles, this impact is not considered significant. This action is considered a minimization measure, not a mitigation measure. No impacts to senior and/or disabled passengers is anticipated as a result of the proposed Build Alternative with the proper minimization measures listed in Section 2.1.8 of the environmental document. Further, the bus stop at Figueroa Street and 23rd Street is in compliance with Americans with Disabilities Act (ADA).

One of Caltrans' goals is mobility and to maximize transportation system performance and accessibility. In support of this goal, Caltrans created the ADA Infrastructure Program under its Maintenance and Operations Program. The objective of the ADA Infrastructure Program is to make Caltrans infrastructure equally accessible to persons with disabilities. Caltrans does not discriminate on the basis of disability and believes in providing equal access to all of its infrastructure, programs, services, and activities. Caltrans is committed to working with its partners to identify and address access barriers to its infrastructure.

In accordance with Title II of the Americans with Disabilities Act of 1990, Caltrans has designated a Statewide ADA Coordinator who is responsible to coordinate ADA compliance across the State. Caltrans has also established a website where access barriers can be reported.

Sanderson 3: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Sanderson 4: As the comment alludes to, the proposed project is part of an overall strategic plan for the region developed by Southern California Association of Governments (SCAG). SCAG is a federally authorized metropolitan planning organization (MPO) who has been delegated to develop plans for transportation, growth management, hazardous waste management and air quality. As part of their delegated authority, SCAG develops a long-range regional transportation plan (RTP) every four years. The RTP combines transportation policies and projects to: address mobility and congestion throughout Southern California; coordinate a balanced regional transportation system; identify adequate funding for transportation projects; and meet federal air quality requirements. As part of the overall plan to manage demands on the transportation system, the latest conforming RTP (2016 RTP/SCS) calls for transportation demand management throughout the region. These strategies focus on reducing the number of drive-alone trips and overall vehicle miles traveled (VMT) through ridesharing, which includes carpooling, vanpooling and supportive policies for ride sourcing services; redistributing or eliminating vehicle trips from peak demand periods through incentives for telecommuting and alternative work schedules; and reducing the number of drive-alone trips through increased use of transit, rail, bicycling, walking and other alternative modes of travel. As mandated by the federal Clean Air Acts, this proposed project is required to demonstrate regional conformity by means of contributing to the overall goal of the strategic plan to reduce regional VMT.

Note that the HOT Lanes revenue must be reinvested in the corridor; increased through put on the HOT Lanes equals additional funds for buses as well as improvements on the corridor.

Sanderson 5: The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures

that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period.

No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

Further, there are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

Sanderson 6: Coordination with the City of Los Angeles's MyFig Project Team is ongoing to ensure that the design details of the proposed project will complement MyFig Project. Design details of how the proposed project will intersect with the protected lane on Figueroa Street will be developed in the design phase of the project, but Figure 30 offers a preliminary design that is currently being considered. Impacts to the bicycle and pedestrian environment on Figueroa Street is not anticipated as the commenter suggests because the traffic at the intersection of Figueroa Way and Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: Also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.

Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, and if you have any questions please contact the City of Los Angeles.

With respect to traffic flow on Figueroa Street, the purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. Enhancing traffic flow at this location will induce travel demand by encouraging drivers to use the new facility. In the traffic study, Caltrans considered a 20% increase in traffic for future analysis, even though, MyFig Project will discourage some motorists from using the proposed ramp to access Figueroa Street. MyFig project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

Sanderson 7: The commenter's recommendation to prepare an Environmental Impact Report is noted.

COUNTY OF LOS ANGELES
FIRE DEPARTMENT
1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

Johnson Letter

March 3, 2016

Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning
Caltrans District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Damrath:

NOTICE OF AVAILABILITY AND NOTICE OF INTENT OF ADOPT MITIGATED NEGATIVE DECLARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "I-100 HIGH-OCCUPANCY TOLL LANE FLYOVER PROJECT", PROPOSES TO CONSTRUCT AN ELEVATED OFFRAMP STRUCTURE ON NORTHBOUND INTERSTATE 100 BETWEEN THE 30TH STREET AND FIGUEROA STREET OVERCROSSING, LOS ANGELES (FFER 201600029)

The Notice of Availability and Notice of Intent to Adopt Mitigated Negative Declaration of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. The subject property is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

LAND DEVELOPMENT UNIT:

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	COMMERCE	GLENDORA	IRWINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
BRADBURY							WHITTIER

Garrett Damrath, Chief Environmental Planner
March 3, 2016
Page 2

1. This project is located entirely in the City of Los Angeles. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

2. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department's Land Development Unit's Inspector Nancy Rodeheffer at (323) 890-4243.

3. The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department has no comment regarding the project at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

Johnson Letter: Thank you for taking the time to review the environmental document. The commenter has not made any comments that require a response per CEQA and NEPA.

February 26, 2016
2125 Bonsallo Ave.
Los Angeles, CA 90007

Mr. Garrett Damrath
Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
110 High Occupancy Toll Lane Flyover Project
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Damrath,

As a resident of the area surrounding the proposed 110 High Occupancy Toll Lane Flyover Project, I send you this letter to register a strenuous objection to this un-needed "Bridge to Nowhere", which will cause visual blight in our neighborhood and result in significant increased traffic congestion at the intersection of Figueroa and 23rd Streets. Bottjer 1

The negative impacts of freeways upon neighborhoods through which they are built are well-known. Many years ago, when the 110 freeway was built through this neighborhood, the section that passes St. John's Episcopal Church and surrounding historic structures was placed in a trench, which reduced the visual and noise impact of the 110 upon this historic area. Thus, when I am commonly sitting on the platform of the Expo Line 23rd Street station I can look beyond the 110 trench and enjoy the panorama of St. John's, the Auto Club building, St. Vincent's Catholic Church, and the Stimson House while waiting for my train. This panorama, and views from other directions, will be significantly impaired for all neighborhood residents if this proposed bridge is constructed. In addition, production of pervasive increased traffic noise will represent a very negative impact on this set of unique historic resources for Los Angeles and on the neighborhood in general. Bottjer 2 Bottjer 3

I not only take the train that passes through my neighborhood, but also drive my local streets. Over the past twenty years the traffic on Figueroa Street has shown steadily increasing congestion. I commonly drive Figueroa during rush hour, and turn from and onto 23rd Street west of Figueroa during these times. Because of the presence of adjacent schools, bus stops, and student housing, there is also high pedestrian activity at this intersection. Combining all these factors can produce gridlock at this intersection so that it is not unusual to take 3-4 light cycles to make a left-hand turn from Figueroa onto 23rd. Addition of traffic from the proposed flyover is sure to produce a highly negative impact by exacerbating an already bad situation for traffic and pedestrians at this intersection, and raises serious safety concerns. Bottjer 4

I am reminded that several years ago a bridge was proposed to be built in Alaska which would cost millions and which would have very little public benefit, and was dubbed "The Bridge to Nowhere". This proposed 110 flyover has the same attributes: an enormous cost and no demonstrable positive impacts by placing additional traffic at Figueroa and 23rd and causing blight to some of Los Angeles' most significant historic structures. Bottjer 5

Sincerely yours,

David J. Bottjer

Bottjer 1: The commenter's opposition to the project is noted. It is the commenter's opinion that the bridge "will cause visual blight" and "result in significant traffic congestion at the intersection of Figueroa and 23rd Streets." is noted.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make a safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Bottjer 2: The commenter's opinion is noted. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 for additional details.

Bottjer 3: During construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the Draft IS/EA. Future noise levels were predicated for design year 2040, the closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear.

Bottjer 4: The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a “STOP” controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: Also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
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- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact City of Los Angeles.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Bottjer 5: The comment is considered the commenter's opinion and does not require a response. Further, this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

FIGUEROA CORRIDOR

March 14, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: Opposition to I-110 High-Occupancy Toll Lane Flyover Project and Draft IS/EA

Dear Mr. Damrath:

The Figueroa Corridor Business Improvement District (Fig BID) submits this letter in **opposition** to the proposed I-110 High-Occupancy Toll Lane Flyover Project and the draft Initial Study/Environmental Assessment on the project. The Fig BID opposes the I-110 High Occupancy Toll Lane Flyover project and alternative 2 (Build). The Fig BID endorses alternative 1 (No-Build) and requests that a full EIR be prepared. The draft Initial Study/Environmental Assessment conducted is flawed and inadequate, as there is clearly significant impacts to the area. Gibson 1 Gibson 2

Specifically, concerns over the project and the proposed alternative 2 include:

- Creating a physical barrier and dividing a vibrant neighborhood and community in half.
- Height concerns from a 55' structure and the resulting visual impact on the community.
- Concerns on impacts to the adjacent businesses from changes to noise, light, traffic, aesthetics and privacy.
- Concerns on impacts to historic and cultural structures like St. John's Church, St. Vincent's Church and the Automobile Club.
- Concerns over the impact on Figueroa St. by increasing H.O.T lane capacity to two lanes and dropping traffic directly onto Figueroa St. Gibson 3
- Concerns that the traffic numbers are not comprehensive enough. Only 4 intersections were analyzed for Level of Service.
- Concerns over the variables used in the traffic simulation, for example Figueroa Way not being a scenario in the no build option.
- Concerns over who would manage and police the new areas created under the flyover structure.
- Concerns about solving one issue, while creating a whole other set of issues just a couple blocks north, and spending a significant amount of money to do so.
- Concerns that the design configuration has been revived from 26 years ago, when it was shelved as the recommended alternative over considerable public opposition and similar concerns.

Sincerely,

Steve Gibson
Executive Director
Figueroa Corridor BID

Cc: Councilmember Curren Price
Councilmember Gil Cedillo
Senator Holly Mitchell
Assembly Member Reginald Jones-Sawyer

3982 SOUTH FIGUEROA STREET, SUITE 207, LOS ANGELES, CA 90037 • TEL: 213.746.9577 • FAX: 213.746.7876 • WWW.FIGUEROACORRIDOR.ORG

The Figueroa Corridor Partnership is responsible for the daily management and promotion of the Figueroa/Flower/Vermont corridor linking downtown Los Angeles to Exposition Park. The Partnership is commited to its' development as a safe, clean economically vibrant and aesthetically pleasing environment in which to conduct business, continue an education, visit a museum, attend a sporting event, worship or reside.

Gibson 1: The commenter's opposition to the project is noted.

Gibson 2: The commenter has not provided how the Draft IS/EA is "flawed and inadequate," therefore; the comment is considered the commenter's opinion and does not require a response.

Gibson 3:

- The commenter has not provided any evidence to support that the proposed Build Alternative will divide the neighborhood and community in half. This statement is considered the commenter's opinion. According to the Community Impact Report (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

- According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 for further details.

- According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period.

  The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and the State Historic Preservation Officer (SHPO) concurs that the undertaking may result in adverse effects on two of the five historic properties:

  - St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
  - St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 High HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demand on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way.

Caltrans Division of Traffic Investigations concurs that enhancing traffic flow at this location will induce travel demand by encouraging drivers to use the new facility. In the traffic study, Caltrans has considered a 20% increase in traffic for future analysis, although, MyFig Project will discourage some motorists from using the proposed structure. MyFig Project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicle travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

- The four analyzed intersections were selected based on the potential impact. It was determined that analyzed intersections were the only intersections that will be affected due to future trip redistribution if the project is implemented. Figueroa Way was considered to be open to traffic in the No Build scenario.

- A maintenance agreement will be in place prior to constriction.

- This comment is considered the commenter's opinion, which does not require a response.

- In 1990, the recommended alternative (Northbound HOV off-ramp to Figueroa Street and Southbound HOV on-ramp from realigned Flower Street, south of 23rd Street with the demolition and reconstruction of the Flower Street Overcrossing) was the main subject. Some of the primary features of the alternative were as follows:

    - An elevated structure Bus/HOV transitway, an elevated HOV northbound off-ramp to Figueroa Street just south of 23rd Street, and an elevated HOV southbound on-ramp from a realigned Flower Street south of 23rd Street just west of the Orthopedic Hospital (2400 South Flower Street).

    - The northbound HOV off-ramp structure would diverge from the mainline transitway and pass over the Adams Blvd. overcrossing, the southbound HOV on-ramp structure, and the realigned Flower Street overcrossing. Likewise, the southbound HOV on-ramp structure would pass over the Adams Blvd. overcrossing and merge the mainline transit way structure south of 27th Street.

There was considerable public opposition to implementing the recommended alternative. Some of the major concerns expressed by attendees were as follows: opposition to widening Figueroa St., circulation impacts due to the increased traffic, Figueroa St. becoming unsafe for pedestrians, harm to historic properties, noise impacts, air quality, aesthetics, and vibration impacts, opposition to the conclusions in the environmental document, earthquake impacts on structures, and lack of public involvement.

The meeting was adjourned with the understanding that Caltrans would develop other alternatives for the northern terminus proposal. After the open house/public input meeting Caltrans met several times with hospital officials, community groups, and the City of Los Angeles Department of Transportation (LADOT) to work out modifications to the design amenable to all concerned. Several alternatives were developed, but were later found infeasible. Another concern was voiced, when the Los Angeles County Transportation Commission (LACTC) was unable to make a firm commitment to a future Light Rail Transit Line on Flower St. This made it difficult for Caltrans and LACTC to develop a mutually usable design configuration for the Flower St. Bridge. Because of these issues and concerns, the design configurations were dropped from further consideration.

Los Angeles Unified School District

Office of Environmental Health and Safety

MICHELLE KING
Superintendent of Schools

THELMA MELÉNDEZ, PH.D.
Chief Executive Officer, Office of Educational Services

ROBERT LAUGHTON
Director, Environmental Health and Safety

CARLOS A. TORRES
Deputy Director, Environmental Health and Safety

March 29, 2016

Submitted via electronic mail

Garrett Damrath
Office Chief, Division of Environmental Planning
California Department of Transportation (Caltrans)
100 S. Main Street, Suite 100 MS16A
Los Angeles, CA 90012

SUBJECT: Interstate 110 High-Occupancy Toll Lanes Flyover Project (SCH No. 2013021002)

Presented in this email are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) relating to the proposed Interstate 110 (I-110) High-Occupancy Toll Lanes Flyover Project (project). The project would entail the construction of an approximately 1,400 foot long elevated off-ramp structure on the Northbound (NB) I-110 between 30th Street and Figueroa Street Overcrossing (OC) in the City of Los Angeles. LAUSD appreciates the opportunity to comment and be a part of Caltrans' environmental planning process for the project.

LAUSD campuses are located within the project's impact area, these schools include: New, Orthopaedic Hospital Senior High Medical Magnet, and John Adams Middle School. Specific environmental impact categories that are of particular concern include, but are not limited to:

- Air Quality (Construction - equipment, traffic/vehicles, and activities)
- Hazards and Hazardous Materials (Construction - transport near campuses)
- Noise and Vibration (Construction - equipment and activities)
- Pedestrian Safety (Construction - routes to schools)
- Traffic and Transportation (Construction - traffic and vehicles)

LAUSD 1

LAUSD's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. If additional issues are identified by LAUSD, we will bring them to the attention of Caltrans.

Thank you for your attention to this matter. Please include LAUSD on all future notices related to the project. If you need additional information regarding our schools, you can contact me at (213) 241-3417.

Sincerely,

Eimon Smith
CEQA Project Manager/Contract Professional
LAUSD, Office of Environmental Health & Safety

c: Gwynneth L. Doyle, CEQA Project Manager, Contract Professional

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

Ensuring a safe and healthy environment for students to learn, teachers to teach, and employees to work.

LAUSD 1:

Air Quality- With the incorporation of the proper minimization measures (refer to section 2.2.4 of the environmental document), temporary air quality impacts will be less than significant. Further, operational impacts are not anticipated. Air quality is likely to improve due to the improved circulation of traffic.

Hazards and Hazardous Waste Materials- With the incorporation of the proper minimization/avoidance measures (refer to section 2.2.3 of the environmental document), impacts are not anticipated as a result of the Build Alternative.

Noise and Vibration- With the incorporation of the proper minimization/avoidance measures (refer to section 2.2.5 of the environmental document), impacts are not anticipated as a result of the Build Alternative.

Pedestrian Safety- Impacts to pedestrian and bicycle facilities are anticipated during construction due to the closure of Figueroa Way to all traffic, specifically pedestrian and bicyclists. These impacts will be minimized to the greatest extent practicable with the incorporation of minimization measure T-1. Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and website information.

Motorist Information: Provide project information using changeable message signs and ground-mounted signs.
Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.
Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Traffic and Transportation- A TMP will be in place to reduce any potential impacts to vehicles due to construction activities.

THE LAW OFFICE
OF
LORE HILBURG

1943 Buckingham Road | Los Angeles, California 90016
Telephone: 323.934.4443 | Facsimile: 323.934.4034 | lore@hilburglaw.com

April 4, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

RE: Proposed North Bound Interstate 110 High Occupancy Toll Lane Flyover Project

Dear Mr. Damrath:

The information on the flyover shows that it is an ill-conceived project costing millions and having a grave negative impact on the surrounding neighborhood with little benefit to the drivers on the 110 freeway. As a local resident, I often drive the 110 freeway and exit at Adams. The intersection is not ideal, but the proposed flyover is a poor solution. This flyover will have lasting negative effects which will not be reduced by any mitigation that Caltrans could do now or in the future. It will permanently disrupt the neighborhood and damage the quality of life for those visiting or attending the church. Hilburg 1

Respectfully,

Lore Hilburg
Attorney at Law

cc: Councilmember Curren Price, CD9
Senator Holly Mitchell
Mayor Eric Garcetti

Hilburg 1: This commenter's opinion that the project is ill-conceived, and will cause a negative effect, which cannot be mitigated by Caltrans now or in the future is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team considered 13 alternatives and 11 alternatives of which were considered, and later eliminated from further consideration for various reasons, which can be found in Section 1.6 of the environmental document. The results of the SimTraffic simulation completed for the proposed Build Alternative found that for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

The remainder of the comment is considered the commenter's opinion and does not require a response.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Audrey Arlington
Organization / Organización:
Email or Mailing Address / Correo Electrónico o Dirección Postal:
aarlington@sbcglobal.net

A Draft Environmental Impact Report should have been prepared for this project. Mere assertions that visual and noise impacts are less than significant, or can be mitigated when the impacts clearly have no possible mitigations, do not justify analysis as a proposed Mitigated Negative Declaration. Arlington 1

In the summary of impacts and mitigations on p. 4 the document flatly proclaims "no impact," to visual/aesthetics which conflicts with the discussion on pages 128-9: "...the proposed build alternative would have an adverse effect on historically significant views to and from St. John's Episcopal Church and St. John's Parish Hall...further diminishing both historic properties integrity of setting..." In the first place, it is inexplicable that the document concludes that the other 3 historic properties (Automobile Club, St. Vincent de Paul Church and Stimson house) will not be affected since the flyover will be visible. But the finding of adverse effect made for St. John's is supposed to be mitigated by "a Memorandum of Agreement (MOA) to address effects. Therefore the impact on the two historical properties will be less than significant. " This is an inadequate, "kick the can down the road" approach to what is clearly a completely un-mitigatable impact. A new, giant, looming aerial ramp of concrete in jarringly close proximity to sensitive uses will be visible, or it won't. There is no "decorative" design work on the concrete nor landscaping around the base of the supporting pylons that will make any difference. Arlington 2

continues

Metro

Caltrans

The noise analysis beginning on p. 179 discusses the increase in noise outdoors, but it is indoors that the impact on St. John's will be felt most. This house of worship is famous for its extensive program of music, a highly sensitive environment which is already impacted by the 110 freeway, through feet-thick concrete walls and closed doors. To increase the noise levels by locating an elevated freeway ramp within feet of the Church property is unconscionable. It will increase the burden this historic property bears from having an increasingly hostile urban environment that has grown around it. Arlington 3

Please submit any written comments, no later than Monday, March 21, 2016, to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Arlington 1: The commenter's opinion of current environmental document level is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for additional details.

Arlington 2: According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House that does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The remainder of the comment is considered the opinion of the commenter and does not require a response.

Arlington 3: A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for additional details.

CITY OF LOS ANGELES
CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER

ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

March 24, 2016

Mr. Garrett Damrath,
Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

Subject: **I-110 High-Occupancy Toll Lane Flyover Project**

Dear Mr. Damrath:

The Los Angeles Department of Transportation (LADOT) staff had a chance to review a Draft Initial Study/Environmental Assessment (IS/EA) report for the proposed elevated off-ramp structure on the northbound I-110 between the 30th Street and Figueroa Street Overcrossing, in the City of Los Angeles.

The proposed project will result in a 1,400-foot long, 55-foot high bridge structure containing two 12-foot wide lanes from the existing Harbor Transitway viaduct to Figueroa Way. The location of the proposed project is a very busy and congested area of downtown Los Angeles, with hospitals, churches, Los Angeles Trade Technical College, USC, Metro Expo Line station, and student housing in close proximity. All these destinations generate very high pedestrian and bicycle volumes. We are concerned about possible conflicts between pedestrians and bicyclists and the exiting vehicles at the terminus of the flyover, at the intersection of Figueroa Street and Figueroa Way. Given the current design layout, we will need traffic control measures to be installed at this location instead of allowing a free flow of vehicles from the flyover onto Figueroa Street. Hunt 1

We are aware of the public's concerns about impacts of this project to the surrounding historic properties and the environment. We support their request to prepare a full EIR/EIS for this $43 million project. Hunt 2

Sincerely,

Michael C. Hunt
Transportation Engineer
Streets & Freeways

AN EQUAL EMPLOYMENT OPPORTUNITY – AFFIRMATIVE ACTION EMPLOYER

Hunt 1: Coordination with the City of Los Angeles's MyFig Project Team is ongoing to ensure that the design details of the proposed project will complement MyFig Project. Design details of how the proposed project will intersect with the protected lane on Figueroa Street will be developed in the design phase of the project, but Figure 30 offers a preliminary design that is currently being considered. Impacts to the bicycle and pedestrian environment on Figueroa Street is not anticipated as the commenter suggests because the traffic at the intersection of Figueroa Way and Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

Hunt 2: The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

WAHA
West Adams Heritage Association

March 18, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

Re: Interstate I-110 HOT Flyover to Figueroa Way
Draft MND and IS/EA
EA: 07-27800/EFIS# 0700000537

Dear Mr. Damrath:

West Adams Heritage Association submits the following comments on the Draft MND and IS/EA provided to WAHA by environmental consultant, Craig Fajnor: [1]

Notice of Intent to Adopt A Mitigated Negative Declaration

The Draft Initial Study/Proposed Mitigated Negative Declaration (IS/PMND) circulated by the lead agency, Caltrans (http://www.dot.ca.gov/dist07/resources/envdocs/docs/EA27800-IS_EA-January_2016.pdf) does not include a Notice of Intent to Adopt a Mitigated Negative Declaration as required by CEQA Guidelines Section 15072. Per CEQA Guidelines Section 15072(g), a Notice of Intent to adopt a Mitigated Negative Declaration shall include: a brief description of the proposed project and its location; the starting and ending dates for the review period during which the lead agency will receive comments on the proposed mitigated negative declaration; the date, time and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project; the address or addresses where copies of the proposed mitigated negative declaration and all documents referenced in the proposed mitigated negative declaration are available for review. The Proposed Mitigated Negative Declaration issued by the lead agency (page 5 of the referenced document) does not contain any of this required information. WAHA(Frost) 1

Traffic

- The Draft IS/PMND analyzes accident history at the existing intersections of the I-110 HOT/Express Lane northbound offramp to Adams Boulevard, and the I-110 northbound offramp WAHA(Frost) 2

[1] Craig Fajnor, Co-Founder and Principal of EcoTierra Consulting, Inc., has more than 30 years' experience in government, including 22 years of experience in environmental planning and project management.

to mixed flow off ramp to Adams Boulevard (Draft IS/PMND, page 98). The Draft IS/PMND states (page 15) that one of the reasons the project is needed is because "the existing northbound HOT lane at Adams Blvd. is a concentrated accident location, which is a safety concern." According to the data in Table 14 of the Draft IS/PMND (page 98), the accident rate for the I-110 HOT/Express Lane northbound offramp to Adams Boulevard is 0.23 accidents per million vehicle miles of travel compared to an "average" (not defined) rate of 0.21. This differential is used to justify the need for the project. However, this rate is based on a total of **two** accidents that occurred on this facility over a three year period, and the differential in the accident rate of 0.2 is statistically insignificant. Accordingly, the proposed project is not needed to address a "safety concern". Moreover, the proposed project does nothing to address the I-110 northbound offramp to mixed flow off ramp to Adams Boulevard, which does have a higher accident rate, although only 6 accidents are reported at this location over a three year period. Accordingly, the proposed project does not meet the purpose and need set forth in the Draft IS/PMND. WAHA(Frost) 2

- The Draft IS/PMND also analyzes the potential effects of the proposed project on the operation of four intersections located in the vicinity of the project. This analysis is addressed in a document referred to as "Traffic Report (April 2015)". This document is not provided in the Draft IS/PMND provided by the lead agency, nor is the location where this document is available for review identified as required by CEQA Guidelines Section 15072(g)(4). As such, the validity of the analysis of the four intersections analyzed in the Draft IS/PMND cannot be determined. WAHA(Frost) 3
- Nonetheless, even assuming the information provided in the Draft IS/PMND to be true, the data included in the Draft IS/PMND provide substantial evidence of a potential significant traffic impact of the proposed project that is not identified or mitigated in the IS/MND. Specifically, the proposed project would deliver all northbound HOT offramp directly to northbound Figueroa Street. Presently, this traffic exits to Adams Boulevard, where it can go east or west on Adams, southbound on Flower Street, or southbound on Figueroa Street, in addition to northbound on Figueroa Street. Accordingly, the proposed project would increase traffic on northbound Figueroa Street over the No Build Alternative, all of which would have to pass through the intersection of Figueroa Street and 23rd Street. Tables 18 through 21 in the Draft IS/PMND (page 107) show that the Build Alternative will increase delay at the Figueroa & 23rd intersection during both the AM and PM Peak hours, under both the 2018 and 2040 scenarios, compared to existing conditions. As indicated on Page 21 of the Draft IS//PMND, the existing conditions at the time of beginning environmental studies are used as a baseline for CEQA purposes. In addition to the increase in delay under all scenarios at the Figueroa & 23rd intersection, Table 20 shows that, under the Build alternative, the Level of Service at the intersection would decline from LOS D to LOS E, which is considered an unacceptable level of service by virtually all transportation agencies. While some of this increase could be attributable to cumulative traffic growth, at least a portion of the increase would be attributable to the increase in traffic on northbound Figueroa Street that is directly related to the proposed project. The lead agency must make public the Traffic Report referenced in the Draft IS/PMND, and specifically address the effects of the increased traffic on northbound Figueroa Street that could potentially result in significant traffic impacts at Figueroa & 23rd. Impacts at this intersection must be mitigated, and additional intersections to the north, such as Figueroa and Washington WAHA(Frost)4

Boulevard, that could be impacted by traffic associated with the proposed project, must be analyzed in the IS/MND before it can be adopted by the lead agency. WAHA(Frost) 4

Air Quality

- The Draft IS/PMND states (page 167) that Project Level Conformity Requirements include consideration of Mobile Source Air Toxic emissions. The Draft IS/PMND further states that, based on Federal Highway Administration guidance, the magnitude and duration of increases in toxic emissions from mobile sources cannot be reliably quantified, and therefore consideration of the health effects of locating the proposed project in proximity to sensitive receptors such as apartment buildings is not addressed in the IS/PMND. Such Federal guidance notwithstanding, the State of California does not ignore the potential health effects associated with the location of sensitive receptors in proximity to transportation facilities. The Air Resources Board (ARB, or CARB), a part of the California Environmental Protection Agency (Cal/EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, ARB conducts research, sets air quality standards, compiles emissions inventories, develops suggested control measures, and provides oversight of local programs. In its Air Quality and Land Use handbook, CARB states "air pollution studies indicate that living close to high traffic and the associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas." The Air Quality and Land Use Handbook cites several studies linking adverse respiratory health effects (e.g., asthma) to proximity to roadways with heavy traffic densities, where the distances between the roadway and the receptors were 300 to 1,000 feet. The proposed project would include construction of the new flyover ramp at a distance of approximately 100 from the apartment building located at the southwestern corner of the intersection of 27th Street and Flower Street, as well as the St John's Cathedral located at Adams Boulevard and Flower Street. As a state agency, the lead agency is obligated to consider the analysis and conclusions of other state agencies that have purview over potential effects of state projects, such as CARB. The state Office of Environmental Health Hazard Assessment (OEHHA) has established modelling protocols for quantifying and evaluating the health effects of toxic emissions from mobile sources. The lead agency must follow the guidance of other state agencies in determining whether the proposed project would result in health impacts to adjacent sensitive receptors. WAHA(Frost) 5
- The Draft IS/PMND further claims (page 170) that "SCAG's Transportation Conformity Working Group (TCWG) has concurred on August 26, 2014, and reaffirmed on April 38, 2015, that the project is not of air quality concern for PM10 and PM 2.5." No substantial evidence is provided to support this claim, or the rationale for the conclusion. The lead agency must provide its rationale for not considering the potential health effects on nearby sensitive receptors that could result from particulate matter emissions associated with the proposed project. WAHA(Frost) 6

Noise

- The Draft IS/PMND analyzes the potential effects of the proposed project with respect to increased traffic noise levels in the vicinity of the project. This analysis is addressed in a document referred to as "Traffic Noise Report (April 2015)". This document is not provided in the Draft IS/PMND provided by the lead agency, nor is the location where this document is available for review identified as required by CEQA Guidelines Section 15072(g)(4). As such, the validity of the traffic noise analysis provided in the Draft IS/PMND cannot be determined. WAHA(Frost) 7
- In particular, no explanation is provided as to how noise levels at the St John's Cathedral (receptor R1/M1) would *decrease* under the No Build Alternative (Table 31, page 185), even though traffic levels would increase (i.e., this is one of the rationales for the proposed project, increased traffic at the existing intersection would pose a safety hazard). Table 31 shows the existing exterior noise levels at sensitive receptors decreasing by between 0.2 and 4.4 dBA under the No Build alternative. This result is counterintuitive and not supported by any substantial evidence contained in the Draft IS/PMND. The lead agency must make public the Traffic Noise Report referenced in the Draft IS/PMND in order to provide substantial for the conclusions regarding traffic noise provided in the IS/MND before it is adopted by the lead agency. WAHA(Frost) 8

General Adequacy of the Draft IS/PMND

Because the lead agency did not follow the requirements of CEQA regarding making documents referenced in the proposed mitigated negative declaration available for public review, and does not include substantial evidence supporting many of the conclusions set forth in the Draft IS/PMND, the Draft IS/PMND must be revised to provide this new information and recirculated for additional public review in accordance with CEQA Guidelines Section 15073.5. In particular, with respect to traffic, substantial evidence included in the Draft IS/PMND indicates a potential new significant traffic impact at the intersection of Figueroa Street and 23rd Street that is not identified in the Draft IS/PMND, which would require recirculation of the Draft IS/PMND in accordance with CEQA Guidelines Section 15073.5(b)(1). WAHA(Frost) 9

WAHA will be following this initial comment and submitting additional comments on the MND and IS/EA.

Sincerely,

Jean Frost
Vice-President
West Adams Heritage Association (WAHA)
c/o 2341 Scarff Street
LA, CA 90007

WAHA (Frost) 1: To comply with CEQA and the CEQA Guidelines, the Department must provide a notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the 30 day review period. The Department must mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing and must also give notice of intent to adopt a negative declaration or mitigated negative declaration by at least one of the following procedures to allow the public the 30 day review period:

1. Publication at least one time in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice must be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.
2. Posting of notice on and off site in the area where the project is to be located.
3. Direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll.

As a matter of Department policy, the Notice of Intent to Adopt an ND or MND must be published in the local paper. Caltrans has complied with CEQA and with Caltrans internal policy by notifying via direct mailing of the document and the notice of intent letter, as well as publication in the Downtown News and La Opinion. Metro has also assisted by distributing an e-blast to potentially interested parties in English and Spanish. All the required information was provided in the Notice as seen below:

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN, JR, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
100 South Main Street, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-0703
FAX (213) 897-0685
TTY (213) 897-4937

Serious drought.
Help save water!

January 22, 2016

Agencies, Organizations, and
Individuals interested in the
I-110 High-Occupancy Toll Lane Flyover Project

File: 07-LA-110 PM 20.1/20.92
SCH No. 2013021002
I-110 High-Occupancy Toll
Lane Flyover Project
Adams Blvd to Figueroa Way

Notice of Availability of Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

The California Department of Transportation (Caltrans), in cooperation with the Los Angeles County Metropolitan Transportation Authority (Metro), proposes to construct an elevated off-ramp structure on northbound Interstate 110 (I-110) between the 30th Street and Figueroa Street Overcrossing, in the city of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard and northbound I-110 High-Occupancy Toll (HOT) off-ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street.

Pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA), Caltrans has studied the effects that the proposed project may have on the environment and community. The results of those studies are contained in an environmental document known as a Draft Initial Study/Environmental Assessment (IS/EA). As a result of the Draft IS/EA, Caltrans intends to adopt a Mitigated Negative Declaration/Finding of No Significant Impact for this project. The purpose of this notice is to inform the public of its completion and availability to any interested individuals.

A public hearing will be held to allow interested individuals an opportunity to discuss the project with Caltrans staff. The public hearing will be held on:

Tuesday, February 23, 2016, 6:00PM to 8:00PM
Orthopaedic Institute for Children
Andrew Norman Hall
403 West Adams Boulevard, Los Angeles, CA 90007

Individuals who require special accommodation are requested to contact the Caltrans Public Affairs Office at (213) 897-3656 at least 21 days prior to the scheduled hearing date. TDD users may contact the California Relay Service TDD line at (213) 897-4937.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Enclosed is a compact disc copy of the draft IS/EA for your review. The draft IS/EA may also be accessed online at http://www.dot.ca.gov/dist07/resources/envdocs/. A hard copy of the environmental document may also be viewed at the following public libraries:

Jefferson Library (2211 West Jefferson Boulevard, Los Angeles, CA 90018)
Vermont Square Branch Library (1201 West 48th Street, Los Angeles, CA 90037)
Vernon Branch Library (4504 S. Central Avenue, Los Angeles, CA 90011)

Please submit any written comments, no later than **Monday, March 21, 2016** to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

If you have any questions, please contact Allison Morrow at (213) 897-3247. Thank you for your interest in this important transportation project.

Sincerely,

RONALD J. KOSINSKI
Deputy District Director, Division of Environmental Planning
Caltrans District 7

Enclosure

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

WAHA (Frost) 2: Accident data is explained in section 2.1.8 of the environmental document. Below is the methodology of accident rate calculations:

- Number of fatal accidents divided by million vehicle-miles (MVM) equals the number of fatal accidents per MVM.
- Number of injury accidents divided by MVM equals the number of injury accidents per MVM.
- Number of PDO accidents divided by MVM equals the number of POD accidents per MVM.

Traffic Accident Surveillance and Analysis System (TASAS) selective record retrieval summary and accident rates for the following period of three (3) years (10/01/2010 and 09/30/2013) are as follows:

The TASAS history analysis revealed a total of 265 accidents (1 fatal, 77 injury, and 178 PDO) within the time period. The primary collision factors identified were speeding (206), improper turn (9), other violations (37), under influence of alcohol (11), other than driver (1), and following too closely (0), where 249 and 16 collisions occurred when the roadway was dry and wet, respectively.

Most of the collisions reported took place when there was no unusual roadway condition. There were 182 collisions which occurred in daylight, 69 in dark with street lights, 8 in dark with no street lights, and 6 in dusk/dawn. For movement preceding collisions, there were: proceeded straight (239), stopped (153), changing lanes (37), slowing/stopping (45), and other (14). Locations of collisions are as follows: interior lanes (177), left lane (45), and right lane (44), beyond shoulder driver's right (7), beyond shoulder driver's left (7), HOV lane (3), right shoulder area (2), and left shoulder area (1). The types of collisions were: 210 rear-end, 37 sideswipe, 14 hit-objects, 2 broadsides, 1 overturn, and 1 head-on. The object struck median barrier (7), guardrail (5), overturned (1), wall (except sound wall) (2), and other object on road (1). Table 14 in the environmental document shows Northbound selective accident rate calculations as well as the average accident rates, which shows a higher than average accident rate for I-110 NB HOT lane off-ramp to Adams Blvd.

Table 14: TASAS– Northbound Selective Accident Rate Calculation

Location	Fatal Accident Rates					
I-110	Actual (Accidents/MVM)			Average (Accidents/MVM)		
	Fatal	F + I	Total	Fatal	F + I	Total
I-110 NB HOT/Express Lane off-ramp to Adams Boulevard PM 20.54	0.000	**0.23**	0.59	0.003	0.21	0.62
I-110 NB off-ramp to Mixed flow off-ramp to Adams Boulevard PM 20.478	0.00	**0.62**	**1.56**	0.003	0.35	1.01
I-110 Mainline NB Freeway PM 20.10-20.92	0.008	**0.64**	**2.18**	0.004	0.31	1.04
Location	TASAS Selective Records Retrieval Summary					
I-110 Between PM 20.10-20.92	TASAS of all crashes between 10/01/2010 and 09/30/2013			Type of Collision 10/01/2010 and 09/30/2013		
	total Collision	fatal Collision	"fatal+injury" Collision	Rear End	Hit Object	Sideswipe
I-110 NB HOT/Express Lane off-ramp to Adams Boulevard PM 20.54	**5**	0	**2**	3	0	1
I-110 NB off-ramp to Mixed flow off-ramp to Adams Boulevard PM 20.478	**15**	0	**6**	8	3	3
I-110 Mainline NB freeway PM 20.10-20.92	**265**	1	**78**	210	14	37

Source: Draft Project Report (September 2015)

Between the period of 10/01/2010 and 09/30/2013, at the NB Route 110 HOT lane off-ramp (PM 20.540), the actual "fatal + injury" accident rates are slightly higher than the average accident rates. Between the period of 10/01/2010 and 09/30/2013, at the NB Route 110 mixed flow off-ramp (PM 20.478), the actual "fatal + injury" accident rates are higher than the average accident rates but and "total" actual accident rates are 50% higher than the average "total" accident rates. Between the period of 10/01/2010 and 09/30/2013, along the NB Route 110 mainline (PM 20.10 and PM 20.92), the actual "fatal + injury" and the "total" accident rates are higher than the average accident rates. The fatal accident occurred on 9/10/2011 were caused by a speeding motorcycle that rear ended a car, then the motorcycle's driver was ejected and collided with the roadway.

WAHA (Frost) 3: The environmental document summarizes the findings of the technical studies, and all technical studies are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

WAHA (Frost) 4: The proposed project will not deliver all northbound HOT off-ramp traffic directly to northbound Figueroa Street. The proposed project will carry the existing HOT lane traffic demand travelling northbound on Figueroa Street via Adams Blvd. Note that the existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. in the eastbound/westbound direction. The decline of 23rd Level of Service from "D" to "E" is attributed mainly to MyFig Project. MyFig project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

WAHA (Frost) 5: Per the Federal Highway Administration's Interim Guidance Update on Mobile Source Air Toxic Analysis in NEPA (December 6, 2012), information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in mobile source air toxics emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to mobile source air toxics exposure associated with a proposed action.

The U.S. Environmental Protection Agency is responsible for protecting the public health and welfare from any known or anticipated effect of an air pollutant. They are the lead authority for administering the Clean Air Act and its amendments, and they have specific statutory obligations with respect to hazardous air pollutants and mobile source air toxics. The U.S. Environmental Protection Agency is in the continual process of assessing human health effects, exposures, and risks posed by air pollutants. They maintain the

Integrated Risk Information System, which is "a compilation of electronic reports on specific substances found in the environment and their potential to cause human health effects."[37] Each report contains assessments of noncancerous and cancerous effects for individual compounds and quantitative estimates of risk levels from lifetime oral and inhalation exposures with uncertainty spanning perhaps an order of magnitude.

Other organizations are also active in the research and analyses of the human health effects of mobile source air toxics, including the Health Effects Institute. Two Health Effects Institute studies are summarized in Appendix D of the Federal Highway Administration's Interim Guidance Update on Mobile source Air Toxic Analysis in NEPA Documents. Among the adverse health effects linked to mobile source air toxic compounds at high exposures are cancer in humans in occupational settings; cancer in animals; and irritation to the respiratory tract, including the exacerbation of asthma. Less obvious is the adverse human health effects of mobile source air toxic compounds at current environmental concentrations[38] or in the future as vehicle emissions substantially decrease[39].

The methodologies for forecasting health impacts include emissions modeling; dispersion modeling; exposure modeling; and then final determination of health impacts – each step in the process building on the model predictions obtained in the previous step. All are encumbered by technical shortcomings or uncertain science that prevents a more complete differentiation of the mobile source air toxics health impacts among a set of project alternatives. These difficulties are magnified for lifetime (i.e., 70-year) assessments, particularly because unsupportable assumptions would have to be made regarding changes in travel patterns and vehicle technology, which affects emissions rates, over that time frame, because such information is unavailable.

It is particularly difficult to reliably forecast 70-year lifetime mobile source air toxic concentrations and exposure near roadways, determine the portion of time that people are actually exposed at a specific location, and establish the extent attributable to a proposed action, especially given that some of the information needed is unavailable.

There are considerable uncertainties associated with the existing estimates of toxicity of the various mobile source air toxics because of factors such as low-dose extrapolation and translation of occupational exposure data to the general population, which is a concern expressed by HEI.[40] As a result, there is no national consensus on air dose-response values assumed to protect the public health and welfare for mobile source air toxic compounds and, in particular, for diesel particulate matter. The U.S. Environmental Protection Agency[41] and the Health Effects Institute[42] have not established a basis for quantitative risk assessment of diesel particulate matter in ambient settings.

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37 EPA, http://www.epa.gov/iris/
38 HEI, http://pubs.healtheffects.org/view.php?id=282
39 HEI, http://pubs.healtheffects.org/view.php?id=306
40 HEI, http://pubs.healtheffects.org/view.php?id=282
41 EPA, http://www.epa.gov/risk/basicinformation.htm#g
42 HEI, http://pubs.healtheffects.org/getfile.php?u=395

There is also the lack of a national consensus on an acceptable level of risk. The current context is the process used by the U.S. Environmental Protection Agency as provided by the Clean Air Act to determine whether more stringent controls are required to provide an ample margin of safety to protect public health or to prevent an adverse environmental effect for industrial sources subject to the maximum achievable control technology standards, such as benzene emissions from refineries. The decision framework is a two-step process. The first step requires the U.S. Environmental Protection Agency to determine an "acceptable" level of risk due to emissions from a source, which is generally no greater than approximately 100 in 1 million. Additional factors are considered in the second step, the goal of which is to maximize the number of people with risks less than 1 in 1 million due to emissions from a source.

The results of this statutory two-step process do not guarantee that cancer risks from exposure to air toxics are less than 1 in 1 million; in some cases, the residual risk determination could result in maximum individual cancer risks that are as high as approximately 100 in 1 million. In a June 2008 decision, the U.S. Court of Appeals for the District of Columbia Circuit upheld U.S. Environmental Protection Agency's approach to addressing risk in its two-step decision framework. Information is incomplete or unavailable to establish that even the largest of highway projects would result in levels of risk greater than deemed acceptable.

Because of the limitations in the methodologies for forecasting the health impacts described, any predicted difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with predicting the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis.

To further illustrate the points made above, the Federal Highway Administration reviewed health risk assessments for a hypothetical roadway under a National Cooperative Highway Research Program research project and three major roadway projects (FHWA-AZ-EIS-14-01-F):

The Federal Highway Administration's review focused on the methodologies used in the studies and the findings related to the incremental health risk attributable to the projects. All four of the health risk assessments involved very conservative assumptions regarding emissions and exposure. For example, each of the studies assumes constant near-term emissions rates, even though national projections by the U.S. Environmental Protection Agency and the emissions analysis for this project show that there will be a large decline in emissions over the lifetime of the project. Likewise, all 4 of the modeling studies assume constant breathing of outdoor air at a fixed location for either 30 years (1 study) or 70 years (3 studies). They assume that people will not change residence (which occurs every 8 years on average in the United States), change jobs (which occurs every 3 years on average), or travel to different parts of a metropolitan area over the course of a given day (even though people travel 26 miles per day on average). The studies even assume that students will remain at elementary schools 24 hours per day for 30 or 70 years.

These assumptions are not realistic and introduce a considerable amount of uncertainty into the results. Even with these conservative assumptions, the 4 studies all report very low risk. Estimated incremental cancer risk from vehicle traffic at the worst-case location in each study ranged from 0.08 case of cancer per million people to 2 cases per million people. As a point of reference, the risk management framework in the U.S. Environmental Protection Agency's Air Toxics Risk Assessment Reference Library defines risk levels between 1 in 1 million and 100 in 1 million as "acceptable." (A risk level of "1 in 1 million" is frequently mentioned in discussions of cancer risk, but under U.S. Environmental Protection Agency risk assessment guidelines, this represents a level below which risk is considered "negligible" and is not a standard or other type of pass/fail threshold). For noncancerous health risks, the U.S. Environmental Protection Agency uses a metric known as the "hazard quotient," where the estimated risks for each pollutant are added together, and a total of less than 1 is considered acceptable. Each of the locations modeled in 3 of the studies had hazard quotients from vehicle emissions of less than 1, in most cases much less; the remaining study did not calculate a hazard quotient. In short, none of these health risk assessments for major roadway projects (including the 2 examples provided by the U.S. Environmental Protection Agency) identified health risks in excess of the "acceptable" thresholds in the U.S. Environmental Protection Agency's risk management framework.

To help put these low health risks from roadway emissions into perspective, the Federal Highway Administration compared them with health risks from traffic fatalities. In 2010, there were 2.47 million deaths in the United States, and 32,728 of these were due to traffic fatalities, meaning that the risk of dying in a traffic accident in 2010 was 0.0106 percent. Converted to terms of risk per million people, this represents a risk of 106 in 1 million per year, or 7,420 in 1 million as a 70-year lifetime risk, consistent with cancer risk estimation. While this risk is very high, and while the Federal Highway Administration is actively working to improve highway safety, most people seem to consider this risk "acceptable" in the sense that they do not avoid vehicle trips to reduce it. In addition, if the mobile source air toxics risk estimates in the studies summarized above are correct, it means that the incremental risk of cancer from breathing air near a major roadway is several hundred times lower than the risk of a fatal accident from using a major roadway.

The U.S. Environmental Protection Agency must make decisions regarding acceptable risk when it develops regulations to control hazardous air pollutants (air toxics) under Titles II and III of the Clean Air Act. The U.S. Environmental Protection Agency's National Emission Standards for Hazardous Air Pollutants for benzene emissions is based on attaining a risk level of no more than 100 cases of cancer per 1 million people. The U.S. Environmental Protection Agency's 2007 mobile source air toxics rule, covering vehicles, fuels, and fuel containers, is designed to result in a remaining risk of approximately 5 in 1 million. Both of these risk levels, considered acceptable by the U.S. Environmental Protection Agency as an outcome of its rulemaking processes, are much higher than the estimated risk from the highway projects that the Federal Highway Administration reviewed.

WAHA (Frost) 6: Documentation that the project has demonstrated interagency consultation is provided in attachment to the September 2015 Air Quality Analysis. The documentation is required as part of demonstration of conformity at the project-level; and includes a screenshot of concurrence by the Transportation Conformity Working Group (TCWG) and a copy of the PM Conformity Hot-Spot Analysis – Project Summary for Interagency Consultation form as submitted to and reviewed by the TCWG. The same information can be obtained at: http://www.scag.ca.gov/programs/Pages/TCWG.aspx.

LA0G086 April 2015 Tracked LA0G086 April 2015	Reaffirmed not a POAQC - Hot Spot Analysis Not Required

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

RTIP ID# *(required)* LA0G086

TCWG Consideration Date
April 28, 2015

Project Description *(clearly describe project)*

The project proposes to construct an elevated off-ramp (fly-over) connector from the northbound I-110 HOT lanes facility to Figueroa Street in downtown Los Angeles. Currently, there is an existing off-ramp from the I-110 HOT lanes to Adams Boulevard. The proposed off-ramp bridge structure would provide an alternate and direct connection for the HOT lanes traffic at the terminus of the existing HOT viaduct to northbound Figueroa Street. The fly-over connector is proposed to have two lanes merging into a single lane to Figueroa Street.

Type of Project *(use Table 1 on instruction sheet)*
New Interchange

County	Narrative Location/Route & Postmiles
LA	I-110/Postmile 20.10/20.92 Caltrans Projects – EA# 27800

Lead Agency: Caltrans

Contact Person	Phone#	Fax#	Email
Andrew Yoon	213-897-6117	213-897-1634	andrew.yoon@dot.ca.gov

Hot Spot Pollutant of Concern *(check one or both)* **PM2.5** X **PM10** X

Federal Action for which Project-Level PM Conformity is Needed *(check appropriate box)*

Categorical Exclusion (NEPA)	EA or Draft EIS	X FONSI or Final EIS	PS&E or Construction	Other

Scheduled Date of Federal Action: 12/2015

NEPA Assignment – Project Type *(check appropriate box)*

Exempt	Section 326 – Categorical Exemption	X Section 327 – Non-Categorical Exemption

Current Programming Dates *(as appropriate)*

	PE/Environmental	ENG	ROW	CON
Start	7/2014	2016	2017	2022
End	7/2016	2019	2019	2023

Project Purpose and Need (Summary): *(attach additional sheets as necessary)*

The current terminus of the northbound I-110 HOT lanes and off-ramp at Adams Boulevard presents a particularly challenging bottleneck, as approximately half of the HOT lane traffic exits through the existing off-ramp at Adams Boulevard to access downtown Los Angeles via Figueroa Street. The existing off-ramp and HOT lanes currently experience heavy queuing and congestion. Increasing capacity at this location is the key to ensuring the HOT lanes to manage delay and serve the motorists. The purpose of the project is to alleviate congestion and reduce queuing and delay in the HOT lanes mainline and off-ramp.

Surrounding Land Use/Traffic Generators *(especially effect on diesel traffic)*

Land use consists of commercial and residential uses in the immediately adjacent to the project area, along with manufacturing and public facilities. The Exposition/University Park redevelopment project area is in close proximity to this proposed project. Other developments within 500 feet of the project area include church, hospital, daycare center and children's school.

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

Opening Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility

Northbound I-110 HOT Lanes, Opening Year 2023			
Location	Alternative	ADT	Truck ADT
Proposed HOT Off–Ramp to Figueroa St	Build	26400	0
HOT Off–Ramp to Adams Bl	No-Build	22000	0
	Build	6600	0

Northbound I-110 HOT Lanes, Opening Year 2023					
Intersection	Alternative	Peak Hour LOS		Peak Hour Delay (sec)	
		AM	PM	AM	PM
HOT Off-Ramp & Adams Bl	No-Build	F	F	216.7	174.6
	Build	F	C	111.4	27.7
Figueroa NB & 23rd near proposed HOT Off-Ramp	No-Build	E	D	58.2	52
	Build	D	C	49.9	34

RTP Horizon Year / Design Year: Build and No Build LOS, AADT, % and # trucks, truck AADT of proposed facility

Northbound I-110 HOT Lanes, Horizon Year 2040			
Location	Alternative	ADT	Truck ADT
Proposed HOT Off–Ramp to Figueroa St	Build	33600	0
HOT Off–Ramp to Adams Bl	No-Build	27000	0
	Build	8400	0

Northbound I-110 HOT Lanes, Horizon Year 2040					
Intersection	Location	Peak Hour LOS		Peak Hour Delay (sec)	
		AM	PM	AM	PM
HOT Off-Ramp & Adams Bl	No-Build	F	F	264.6	197.8
	Build	F	D	166.7	39.7
Figueroa NB & 23rd near proposed HOT Off-Ramp	No-Build	F	E	85.4	63.2
	Build	E	C	77.3	33.6

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

Opening Year: If facility is an interchange(s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT

Cross Street Data for Opening Year 2023			
Location	Alternative	ADT	Truck ADT
Figueroa St North of 23rd St	No-Build	24092	482
	Build	31483	630
Adams Bl between Figueroa St & Flower St	No-Build	25725	515
	Build	21167	423
Adams Bl between Flower St & Existing HOT Off-Ramp	No-Build	30683	614
	Build	17783	356

Northbound I-110 HOT Lanes, Opening Year 2023					
Intersection	Alternative	Peak Hour LOS		Peak Hour Delay (sec)	
		AM	PM	AM	PM
HOT Off-Ramp & Adams Bl	No-Build	F	F	216.7	174.6
	Build	F	C	111.4	27.7
Figueroa NB & 23rd near proposed HOT Off-Ramp	No-Build	E	D	58.2	52
	Build	D	C	49.9	34

PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation

RTP Horizon Year / Design Year: If facility is an interchange (s) or intersection(s), Build and No Build cross-street AADT, % and # trucks, truck AADT

Cross Street Data for Horizon Year 2040			
Location	Alternative	ADT	Truck ADT
Figueroa St North of 23rd St	No-Build	25925	519
	Build	33883	678
Adams Bl between Figueroa St & Flower St	No-Build	27683	554
	Build	22758	455
Adams Bl between Flower St & Existing HOT Off-Ramp	No-Build	33017	660
	Build	19267	385

Cross Street Data, Horizon Year 2040					
Alternative	Location	Peak Hour LOS		Peak Hour Delay (sec)	
		AM	PM	AM	PM
NB I-110 off-ramps & Adams Blvd.	No-Build	F	F	264.6	197.8
	Build	F	D	166.7	39.7
Figueroa St. & 23rd St.	No-Build	F	E	85.4	63.2
	Build	E	C	77.3	33.6

Describe potential traffic redistribution effects of congestion relief *(impact on other facilities)*
The proposed project would help motorist bypass the current bottleneck intersection at Flower/Adams and provide a direct connection from the HOT lanes to Figueroa Street. This would alleviate the queuing and improve the operation and safety of the HOT lanes facility within the project area. According to the Traffic Study Report prepared by Caltrans (April 2015), the SYNCHRO simulation model indicates that the proposed fly-over HOT off-ramp to Figueroa Street would alleviate traffic congestions at key analyzed intersections in the vicinity of the project.

Comments/Explanation/Details *(attach additional sheets as necessary)*

The project is proposed to provide an alternate bypass for the current bottleneck intersections; to reduce the queuing; and to improve the operation and safety of the HOT lanes facility and off-ramps. According to the traffic data, the proposed project is anticipated to improve the delay and LOS at the existing HOT lane off-ramp at Adams Boulevard. The projected 2040 ADT and truck traffic for the proposed facility and the arterials in the vicinity are far less than those criteria listed in the 40 CFR 92.123(b)(1). The State vehicle code prohibits use of high occupancy facilities by heavy duty truck traffic; and thus the heavy duty trucks are not anticipated to use the proposed off-ramp. The delay and LOS at several intersections are anticipated to improve as a result of the project. The proposed project would thus not be of air quality concern for $PM_{2.5}$ and PM_{10}.

WAHA (Frost) 7: The environmental document summarizes the findings of the technical studies, and all technical studies are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

WAHA (Frost) 8: The noise impact study prepared for the project is in accordance with Caltrans Traffic Noise Analysis Protocol (TNAP-May 2011) which stemmed from Title 23 of Code of Federal Regulation Part 772 (23CFR772). In accordance with TNAP, traffic noise impacts are determined based on the future predicted noise levels at design year (Year 2040 for this project). Future predicted noise levels are determined using noise prediction model which is based on future design year traffic forecasts/data. Future traffic forecasts are conducted in accordance with the travel demand model developed by Southern California Association of Governments (SCAG). The SCAG region encompasses six counties (Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. In their preparation and development for Regional Transportation Plan, SCAG accounts for all planned development and the latest land use/growth assumption in their travel demand model.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

The noise measurement sites were selected taking into consideration the following general site requirements:

- Sites were acoustically representative of areas and conditions of interest
- Sites were located at areas of human use
- Sites were clear of major obstructions between source and receiver
- Microphone positions were more than 10 feet away from reflecting surfaces
- Sites were free of noise contamination by sources other than those of interest
- Sites were not located near barking dogs, lawn mowers, pool pumps, air conditioners, etc.
- Sites were not exposed to prevailing meteorological conditions that are beyond the constraints discussed in the Technical Noise Supplement (TeNs)

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear.

In Table 31 of the environmental document shows a decrease in noise levels at R1 and M1 under the Future 2040 No Build Noise Levels** as mentioned in Table 31's footnotes **All future Alternative 2 and No-Build noise levels are based on freeway traffic only. On the other hand, existing noise levels measured included the noise from local street traffic, airplane, train etc.

Refer to section 2.2.5 of the environmental document for additional details. The environmental document summarizes the findings of the technical studies, and all technical studies are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

WAHA (Frost) 9: Caltrans has complied with CEQA by providing the public the opportunity to comment on the environmental document. Further, it is considered the commenter's opinion that substantial evidence supporting many of the conclusions was not provided. All supporting documents (technical studies) are available to the public upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

A D H O C
Adams Dockweiler Heritage Organizing Committee
P.O. Box 15881 University Park California 90015 (213) 748-1656

GD

Mr. Garrett Damrath, Senior Environmental Planner
Division of Environmental Planning Caltrans District 7
I-100 High Occupancy Toll Lane Flyover Project
100 South Main Street
Los Angeles, CA 90012

March 21, 2016

File: 07-LA-110PM 20.1/20.92 ISCH No. 2013021002t
110 HOV-HOT off ramp to Figueroa Way, Los Angeles CA,
EA:07-27800/EFIS#:0700000537

Mr. Damrath,

I am an historic-preservation consultant and have served as Chair of the Adams Dockweiler Heritage Organizing Committee (A.D.H.O.C.). for the past 28 years. I was the successful proponent for the nomination of St' John's Church as a Los Angeles Historic-Cultural Monument, LA-HCM #516 (1991). When Fathers Mark Kowalewski and Dan Ade first became aware of the proposed Flyover Project they sought my counsel with regards to the potential negative impacts the Project would have on what is now the sanctified Episcopal Archdiocese Cathedral of Southern California.

As their advisor for the historic properties I have been in attendance along with the Fathers at their meetings with Caltrans starting with: a). the Caltrans' so-called "courtesy" meeting at your downtown headquarters on October 07, 2014; b). the combined St. John's & West Adams Heritage Association's public hearing for the Flyover on December 03, 2014; c). the Caltrans "consulting parties" meeting on April 22, 2015, once again at the Caltrans' offices; and d). finally your Mitigated Negative Declaration public hearing this last February 23rd at the Orthopedic Institute For Children.

Beginning with my written comments of February 28, 2013 in response for the Caltrans' "Notice of Preparation (NOP) Draft Initial Study Interstate 110 Transitway Connector Project / 110 HOV-HOT off ramp to Figueroa Way, Los Angeles, CA," I have consistently counseled and advocated for a "no Project" resolution. It has been and continues to be my finding that the negative impacts to St. John's and the surrounding historic properties caused by the proposed "build alternative" cannot be mitigated. Therefore I am requesting that you immediately rescind your Project's environmental document, an insufficient Mitigated Negative Declaration, and issue the required Draft Environmental Impact Report, which you began preparing with your Notice of Preparation (NOP). ADHOC 1

After three years of waiting and the repeated assurances of Caltrans' staff at our meetings of a, b, and c, that you were working on the issuance of a DEIR, I was shocked by your January 22, 2016 notice that you were actually issuing not the required EIR but just a MND for a Project which you yourselves have identified as having significant negative impacts to St. John's Episcopal Cathedral in your "Finding of Adverse Effect for the Interstate 110 (I-110) Flyover Project, City and County of Los Angeles / 07-LA-110 PM 20.10/20.92 EFS: 0700000573 EA 27800" document of August 2015. Caltrans' FAE in its' conclusions (8.0 / page 56) states:

> *"As described in Section 5.0m the proposed project will result in an adverse effect on a historic property as defined in 36 CFR 800.5(a)(2). Therefore Caltrans, in applying the Criteria of Adverse Effect, proposes that a Finding of Adverse Effect is appropriate and is seeking the SHPO's concurrence in the finding pursuant to 36 CFR 8000.5(c) and First Amended Section 106 PA Stipulation X.C(1). This Finding of Effect applied the Criteria of Adverse Effect relative to the proposed undertaking and its effect on the five historic properties in the APE as identified in the HPSR (2015) and the Supplemental HPSR (2015). The proposed undertaking, Alternative 2 (Proposed Build Alternative), if implemented, will have the potential to affect one historic property, and those effects are adverse because the impacts will further indirectly alter the integrity of the historic property's setting."* ADHOC 2

That Caltrans would choose, institutionally, to obfuscate the importance of this finding by their bureaucratic finagling and myopic self-serving parsing throughout their MND, and falsely claim the proposed superficial mitigations could reduce the impacts to less then significant, is more than disappointing given my past experience with Caltrans. To have Caltrans staff today offer to the clergy of St. John's that the painting of the church parking lot green could be mitigation is nothing less than a contemptuous insult.

As I made clear in my written response to your NOP notice in 2013 I have had extensive background with the proposed Flyover Project going back over 25 years when CALTRANS adopted what is now the existing "no build" project as the then "preferred alternative" project. In 1991 your organization issued a supplemental historical architectural survey report by Diane Kane. In its' conclusions it stated:

> *"In an open house public meeting held on May 3rd, 1990, the revised design met with extensive public concern. Consequently Caltrans modified the design concept and developed several other alternatives, including the current proposed presented in this report. Because this new design has been accepted by the surrounding community as less intrusive while still resulting in improved Transitway operation and simplified construction procedures, it is Caltrans' preferred alternative."* ADHOC 3

That's what today the no build alternative still is: "less intrusive while still resulting in improved Transitway operation and simplified construction producers." It was a no build in 1990 and it needs to remain a no build in 2016. It was a bad idea then and it is a bad idea today. The community then thanked Caltrans. In fact, I on behalf of ADHOC, and Ms. Jean Frost of the CRA/LA Adams Normandie 4321 Project

Area Committee (PAC) we were given the Caltrans' 1999, Excellence in Transportation Award as notified by Bob Coleman, Deputy Director / Project Development in his letter of 10/22/99. This award was for the eight years of work it took for the University Park community working with the close cooperation of Caltrans to require that the reluctant City of Los Angeles fulfill its' responsibilities to complete the approved mitigations for the historic streetscape setting at Adams Boulevard & Figueroa.

ADHOC 3

"Dear Mr. Childs and Ms. Frost,

It gives me great pleasure on behalf of Caltrans to congratulate you and your staff for the outstanding achievement in the development of the Adam Figueroa Historic District.

This project was recognized as the winner in Category 9, historic preservation, culture enhancement 1999, Excellence in Transportation Awards competition.

ADHOC 4

The judges noted, with respect and sensitivity to the area's cultural, historic environment, this right-of-way project is an outstanding example of beauty and cooperation.

The California Department of Transportation is proud to acknowledge the achievements of everyone whose professional talent, dedication, commitment to excellence contributed to our state's continued leadership in transportation system, design, development, maintenance, and operation

Please convey my congratulations to all those responsible for a job well done."

These mitigations included the new code compliant manufacturing by Union Metal of Canton Ohio of thirty-three historic reproductions M-1906 vintage street standards and landscaping of thirty new Sycamore trees. This action was reported in the Los Angeles Times by reporter Bob Pool in the Thursday March 18, 1999 edition.

I made the above referenced comments in my oral testimony at your only public hearing for the Project at Orthopaedic in February. That evening you also heard testimony from thirty-seven other commentators who also opposed this boondoggle and or requested a DEIR be issued. The community spoke in 1991 and Caltrans listened. The community has spoken again. Is the new Caltrans listening?

ADHOC 5

This proposed "new" project undertaking seems very similar to the original Alternative F from the 1991 FEIR that was rejected in part because of the significant negative impacts to the historic resources of University Park. In fact, all of the many project alternatives for the flyover HOV ramps above Adams Boulevard were also rejected. To have Caltrans come back to our historic neighborhood, twenty-five years later, with this "new" proposal, I personally find to be a betrayal of the University Park community by Caltrans.

ADHOC 6

Upon reflection the lingering existence of what the community had perceived as the abandoned construction remnant of a stubbed-out ramp on the north bound I-110 near 28th Street, is revealed now to be a premeditated lynchpin for a "phase-2" of the Caltrans obsession with its' Flyover connection. This seems not unlike their decades long obsession with the I-710 connection in South Pasadena. Was this abandoned-ramp a "sleeper-cell Trojan Horse" waiting for a future moment for development?

ADHOC 7

I recently wrote a Flyover background article for the West Adams Heritage Association's newsletter WAHA MATTERS (October 2015) titled "DOHENY DITCH vs. 110-FLYOVER". It begins:

"Author Don Sloper begins his book Los Angeles's Chester Place appropriately with a location map. The map's caption however touches on one of the many urban legends that still surround the notorious Doheny family name:

'The Harbor Freeway (Interstate 110) starts from downtown Angels to San Pedro at the Port of Los Angeles on the west side of Figueroa Street. But before reaching Chester Place, the freeway suddenly curves, dives under Figueroa Street, and continues for a mere seven blocks completely below ground level before proceeding for several miles along the east side of Figueroa Street. The Los Angeles City Council approved the route by a vote of 11-2 on August 11, 1950, despite city councilman Kenneth Han's objection that proper hearings had not been held. The curve spared Chester Place and the short stretch below ground level saved residents from traffic noise. While some shift was desirable because of the University of Southern California campus and Exposition Park in the neighborhood, the positioning was exceptionally favorable to the influential residents of Chester Place.'

ADHOC 8

Some of those "influential residents" included Rufus von KlienSmid, Frank Seaver, Thomas Dockweiler and of course the widow Madame Estelle Doheny. Author Sloper is cautious as an historian and avoids reporting specifically that Estelle wheeled a "back-room" deal. His book does however provide for a reasonable conclusion in support of my neighborhood's long held oral-legend of the "Doheny Ditch"...

The creation of the "Doheny Ditch" is a far more grandiose and complex urban oral legend than dealing with USC frat boys however. I have heard various accounts of the events from the telling and retelling by different neighbors over the years. Varied embellishments are, after all, at the heart of oral history and when factual data is not available to confirm or deny, then sometimes, when plausible, a legend is born.

The story is told that in the early 1950's when Caltrans was in the process of determining a route south for the Harbor Freeway extension from downtown to San Pedro Madame Estelle was distraught that it would directly and severally impact "her" Chester Place and "her" St. Vincent's Church.

The very thought that a public freeway would be erected on "her" doorstop was not acceptable. Through her enormous wealth and political influence she would insure that the new right-of-way would not be allowed to negatively impact her realm.

Confronted with bureaucratic push back about the prohibitive costs of engineering changes to the proposed route by taking it below grade into a "slot" or "incut" to mitigate the intrusion of visual blight, noise and toxic pollution, Madame simply hired her own planners and engineers to design the necessary changes and forwarded them to Caltrans for implementation. A variant of the story also credits her with also writing a check to cover the actual difference in construction costs.

ADHOC 8

The reality of truth-or-legend is that the Caltrans' slot-incut was indeed constructed sparing that portion of the east side of University Park along the Chester Place frontage from the visual intrusion of the freeway. When completed in 1957 the slot-incut or "ditch" resulted in an at-grade streetscape vista along Figueroa between 23rd Street and Adams Boulevard that was an open space void of the highways traffic. The "ditch" established a new environmental context for the surrounding historic setting that has existed for the last 58 years.

People entering or exiting our historic West Adams community at Figueroa can enjoy this sheltered open space without being confronted with the repressive visual blight that our freeway system has inflicted on so much of Los Angeles. So also can the worshippers at two of the finest examples of religious architecture in the city, St. John's and St. Vincent's."

As a forty-year owner-resident of University Park and a historic preservation advocate, I point out that there has been no acknowledgement by Caltrans in any of their historic impact evaluations of the importance of the very context of the Adams-Figueroa I-110 Freeway incut (ditch) itself as a historic-cultural resource setting.

Caltrans is now proposing to add their above-grade visual blight of a two-lane 50-foot high arching ramp into what has been historically a setting bereft of such repugnant concrete intrusions. The proposed "build alternative" Project is an unwarranted and unjustifiable intrusion that defiles the existing historic character-defining setting of one of the most important historically significant intersections within the City of Los Angeles which features a triptych of major architectural styles by leading architects:

ADHOC 9

- St. John's Episcopal Cathedral (1924, Romanesque Style, architects F. Pierpont and Walter Davis) LA-HCM #516 and individually listed on the National Register of Historic Places,
- St. Vincent De Paul Roman Catholic Church (1924, Spanish Renaissance & California Mission Style, architect Albert C. Martin) LA-HCM #90 and part of the Chester Place National Register Historic District,

- Automobile Club of Southern California headquarters (1922, Spanish Colonial Revival, architects Sumner F. Hunt and Silas R. Burns) LA-HCM #72.

ADHOC 9

Caltrans has cynically chosen to dismiss the negative visual impacts of their Flyover to this vital historic intersection in their evaluation process and focus rather on the fourth corner, the home to Popeye's-Chicken. The Popeye's-Chicken mini-mal, was built during the mid 1980's in collaboration with the CRA/LA / AN-4321 as part of an economic development incentive program on remnant lots left over from the 1950's Caltrans taking for their I-110 Freeway. Caltrans know claims that this commercial intrusion justifies dismissing their new negative impacts because the historic setting has been "urbanized". A convenient self-fulfilling prophecy.

ADHOC 10

The proposed build-alternative Flyover is a monstrous, penetrating visual intrusion that blights a major City historic asset. It violates the University Park historic neighborhood. I agree with the words spoken by Mr. James Smith of the New Designs Charter School expressed, at your Orthopaedic public hearing;

> *"I don't understand how I can stand here and tell you that it's wrong and 20 other people done already told you that it's wrong. Now I stand here following them, telling you on behalf of 700 students, this is wrong. No build. Go home. Come back, no more."*

ADHOC 11

NO BUILD!

GO HOME!

COME BACK NO MORE!

Jim Childs, Chair A.D.H.O.C. JIM CHILDS

2326 Scarff Street
University Park HPOZ / St. James Park National Register Historic District
Los Angeles California 90007
213-748-1656 / jeanjim@earthlink.net

CC: St. Johns Episcopalian Cathedral
West Adams Heritage Association
University Park H.P.O.Z. Board
North University Park Community Association
L.A. City Council District No.9
L.A. City Council District No.1

ADHOC 1: The commenter's support for the No-Build Alternative is noted. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

Further, the Notice of Preparation (NOP) for the proposed project of an EIR was sent to the State Clearinghouse in error. A memo was sent to the State Clearing house to correct this error in February 2013. The memo correctly stated that the CEQA document being prepared is an Initial Study, and Caltrans would like to request that the Notice of Preparation of an EIR be rescinded and a Notice of Early Consultation be issued in its place.

ADHOC 2: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. There seems to be a misunderstanding with respect to the preparation of a Draft EIR, Caltrans did not state that an EIR will be prepared for this project.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John’s Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John’s Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The reminder of this comment is considered the commenter's opinion and does not require a response.

ADHOC 3: The mobility needs of the community has changed since the 1990 open house/public meeting. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

ADHOC 4: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

ADHOC 5: The mobility needs of the community has changed since the 1990's. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

ADHOC 6: The mobility needs of the community has changed since the 1990's. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

ADHOC 7: The mobility needs of the community has changed since the 1990's. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

ADHOC 8: The Interstate 110 (I-10) Harbor Freeway was not considered for historic significance in the identification phase of the cultural resources studies because the Advisory Council on Historic Preservation passed a Section 106 exemption which excludes most of the Interstate Highway System from being considered historic properties under Section 106 of the National Historic Preservation Act (2005). MAP 21 maintains the exemption (23 USC Section 103).

By establishing these exemptions, most of the Interstate Highway System was removed from the jurisdiction of Sections 106, but special features are nonetheless subject to conformance with applicable historic preservation regulations. Section II of the Section 106 exemption allows certain elements of the Interstate Highway System, including bridges, tunnels, and rest stops, to be excluded from the exemption *if they can be demonstrated to possess national and/or exceptional historic significance*.

Review of the "Final List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System" revealed no recommended elements on Interstate 110 (https://www.environment.fhwa.dot.gov/histpres/highways_list.asp). As stated above, because I-110 is part of the National Highway System, it falls within the purview of the exemption.

With Caltrans project managers, Caltrans Professionally Qualified Staff (PQS) are jointly responsible for describing and establishing project Areas of Potential Effect (APE). The project APE map was prepared to ensure identification of significant historical, architectural, and archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (National Register) that may be directly or indirectly affected by the proposed project, in compliance with 36 Code of Federal Regulations (CFR) Part 800.16(d). The direct APE encompasses all ground disturbances associated with the project. The indirect APE includes the direct APE, and extends to include parcels that directly face the proposed project and may be affected by its construction or implementation. The indirect APE also includes parcels that could have visual, noise or vibration effects caused by proposed project

construction or implementation. In response to comments from Consulting Parties, and following a conversation with SHPO reviewers, a Supplemental APE was prepared to include additional properties in the indirect APE that may be in view of the proposed flyover. Areas of Potential Effects are established without consideration of what may or may not be known historic properties. The boundary is drawn to ensure that those properties are considered in the process, only if there is a chance that the project may directly or indirectly affect the property. Properties that would are not expected to be affected are not included in a project APE merely because they are within a certain distance of the proposed project.

The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

ADHOC 9: The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

ADHOC 10: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

ADHOC 11: The commenter's opposition to the project is noted.

University Park
Historic Preservation Overlay Zone

Established March 22, 2000 Ordinance No. 173160

University Park H.P.O.Z. Board

Jean Frost, Chair/Secretary
Jim Robinson, Vice Chair
David Raposa, Treasurer
Dan Burke, Board member
Steven Fader, Architect

March 21, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

Re: Interstate I-110 HOT Flyover to Figueroa Way
Draft MND and IS/EA
EA: 07-27800/EFIS# 0700000537

Dear Mr. Damrath:

On March 8, 2013, in response to the Caltrans' Notice of Preparation (NOP) for the Draft Initial Study for the I-110 TRANSIT-WAY CONNECTOR PROJECT HOV/HOT OFF RAMP TO FIGUEROA WAY, the University Park HPOZ Board requested that the Board be listed as a "party of interest" in any and "all future actions, and notices, regarding the environmental review process for the above referenced subject property."[1] HPOZ 1

We have had no notice until the recent 2016 general publication notice of the Draft MND and IS/EA (MND/IS/EA) in the **Downtown News** and **La Opinion**. We placed this matter on the HPOZ Board Agenda on February 16, 2-16, as: HPOZ 2
"(Item) 9. Other Board Business
I-110 HOV Lane Flyover Project - Adams Blvd. to Figueroa Way Study/Environmental Assessment (IS/EA), MND 07-LA-110 P 20.1/20.92, SCH 2013021002, comment, Caltrans hearing 2/23/2016."

The Board affirmed its position that the MND/IS/EA failed to comply with the requirements of the California Environmental Quality Act (CEQA), the National Environmental Quality Act (NEPA), and Section 4(f); further the project itself fails to comply with the Secretary of the HPOZ 3

[1] March 8, 2013 HPOZ Board Letter response to the NOP

Interior's Standards & Guidelines (SISG), the University Park Preservation Plan, [2]and the South Area Community Plan (SACP) as well as the General Plan. HPOZ 3

The No Build Alternative is the environmentally superior alternative of those offered in the MND/IS/EA and is the only justifiable alternative in the environmental document. We question why only two alternatives are provided in the MND and suggest further explorations of alternatives in an EIR is needed. HPOZ 4

The Board has not been asked for its evaluation of this undertaking nor assistance in interpreting its own Preservation Plan, yet you recommend in your VISUAL IMPACT ASSESSMENT that *"The aesthetic team should review all documents relating to the University Park Historical Overlay Zone due to the projects close proximity,"*[3] The notation acknowledging that there is a proximate Preservation Plan is an unsuccessful attempt at promising impact minimization. This undertaking cannot conform to the University Park Preservation Plan which requires that one *"maintain and enhance the quality of life and sense of place and character in the University Park (UPHPOZ) area....insure that new development will fit into the existing neighborhood by respecting it's surrounding architectural context....(and) maintain the appropriate settings and environment to preserve these buildings."* [4] You also suggest that ***"The aesthetic team should review all documents relating to the University Park Historic Overlay Zone due to project's close proximity."*** [5] But there is nothing in the record that substantiates any effort made for this review. HPOZ 5

The MND states that *"measures to avoid or minimize visual impacts which will be incorporated into the project"* will mitigate the impacts to a less than significant level but, to date, no such effective mitigation measures have been incorporated. Because the MND states that impacts can be mitigated to a level of insignificance, little serious or fact based consideration is given to the impacts to historic resources. There is no evidence in the record that the proposed mitigations can mitigate the serious impacts. Caltrans' Finding of Adverse Effects (FAE) acknowledged serious adverse effects to St. John's Cathedral. We suggest that the impacts are far greater than those stated in the FAE and include impacts to the Stimson House, the Slauson House, St. Vincent's, the Automobile Club, and the entire Chester Place Nation Register District. HPOZ 6

The reality may be that there are some things that cannot be mitigated. The impact of a 54 foot concrete two-lane highway looming over St. John's Cathedral and depositing traffic to 23rd Street and Figueroa, cannot be mitigated by any of the stated mitigations in the MND/IS/EA.

Although the subject site is located just outside the administrative boundaries of our HPOZ, we find that it has potential significant negative impacts to the Chester Place National Register Historic District for which our Board has administrative responsibilities under Los Angeles City HPOZ 7

[2] While the project is outside of the HPOZ boundaries, there are principles in the Preservation Plan that are based on National Standards and shed light on the Project
[3] Visual Impact Assessment, HOV off-ramp connector on the Northbound I-110 between 30th Street and Figueroa Street Overcrossing, April 20, 2015, by George Olguin and Ron Russak, p. 5
[4] University Park HPOZ Preservation Plan, Mission Statement, adopted by Los Angeles City Planning July 14, 2005.
[5] Visual Impact Assessment, Ibid.

Ordinance and seriously effects the quality of life in the University Park neighborhood. Its impact on traffic on 23rd Street alone calls out an alarming deficiency in the MND/IS/ESA. HPOZ 7

Our Board is charged under the HPOZ Ordinance to insure CEQA compliance for all projects that may have potential negative impacts to the character defining features of the Historic District. It is our Board's custom and practice to not be limited in our comments to artificial boundaries but to view the context of the whole of the historic community setting. The intersection of Adams Boulevard and Figueroa Street is a primary gateway portal to the historic University Park neighborhoods. There is an inter-connectivity and relationship among the historic buildings and sites which is deeply affected by the Project. HPOZ 8

On three of the four corners of that intersection are Los Angeles Historic-Cultural Monuments that exemplify the finest architectural work of renowned Southern California architects: Sumner P. Hunt's, Spanish Colonial Style, Auto Club of Southern California (No.72), Albert C. Martin's, California M1ssion Style, St. Vincent De Paul Church (No.90) and F. Pierpont Davis's, Italian Romanesque Style, St. John's Episcopal Church (No.516). This visual triptych of historic Monuments is a unique cultural asset of our City, which requires the most stringent review of potential impacts caused by any new construction. We agree with SHPO that there are effects to these historic properties. The impacts to the visual setting are widely misunderstood and underestimated by Caltrans staff which results in a misleading visual impacts assessment. HPOZ 9

While the University Park Preservation Plan includes Guidelines relating to the Public Realm, the Plan did not foresee or envision that a 54 foot, "flyover", concrete two-lane project would be suggested in such close proximity to any historic resources. We strongly disagree with your evaluation that "Architectural treatment of the HOV Roadway elements will help preserve the goals of the Historical Preservation Overlay Zone." [6] As the designated interpreter of the Plan and its goals, the Board cannot find this statement valid. The MND/IS/EA fail to recognize impacts and minimize severe environmental impacts, with nothing in the record to substantiate their analysis. HPOZ 10

We urge Caltrans to adopt the No Build Alternative and, should this project proceed, a full EIR should be undertaken. We question the actual need for this project. We are available to meet with you to explain further our concerns, our Preservation Plan, and again ask that the Board be listed as a "party of interest" in any and all future actions, and notices, regarding the environmental review process" for the above referenced undertaking. HPOZ 11

Sincerely,

The University Park HPOZ Board
By Jean Frost, Chair
c/o 2326 Scarff Street, #1
LA, CA 90007

[6] Visual Impact Assessment, Ibid., p. 5

HPOZ 1: The University Park H.P.O.Z Board has been added to the distribution list, but please note the commenter was listed on the distribution list.

HPOZ 2: The published notice of the availability of the IS/EA and the intent to adopt a mitigated negative declaration in Downtown News and La Opinion fulfils the required notice to the public.

HPOZ 3: The commenter's opinion is noted. This comment is considered the opinion of the commenter because no evidence has been provided to show how the environmental document has failed.

HPOZ 4: The commenter's opinion is noted. Thirteen (13) alternatives were considered (11 alternatives of which were considered but eliminated from further discussion for various reasons, which are explained in Section 1.6 of the environmental document). The remaining alternatives are the No Build and the Build Alternative. Commenter's suggestion of completing an EIR is noted.

HPOZ 5: The aesthetic team will evaluate the aesthetic needs as the projects advances. The University Park Historic Overlay Zone documents were circulated internally to make the Project Development Team members aware of the importance of considering aesthetics for the project. The commenter's opinion is noted.

HPOZ 6: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
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An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The remainder of the comment is considered the opinion of the commenter and does not require a response.

HPOZ 7: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

HPOZ 8: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

HPOZ 9: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

HPOZ 10: The commenter's opinion is noted. The aesthetic team will evaluate the aesthetic needs as the project advances. The University Park Historic Overlay Zone documents were circulated internally to make the Project Development Team members aware of the importance of considering aesthetics for the project.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

HPOZ 11: The commenter's support for the No Build Alternative is noted. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

The purpose and need of the project is as follows:

Purpose:
The purpose of the project is to alleviate congestion and reduce the queuing and delay on the managed HOT lanes, Adams Blvd. off-ramp, and associated nearby intersections. The project would improve traffic flow in a congested area of downtown Los Angeles by removing traffic from congested and confusing intersections.

Need:
The current termination of the northbound I-110 HOT lanes at Adams Blvd. presents a particularly challenging bottleneck, as approximately half of the HOT lane traffic exits here to access downtown Los Angeles via Figueroa Street, which affects the nearby intersections of Flower St. & Adams Blvd. and Northbound I-110 HOT off-ramp to Adams Blvd. The existing Northbound HOT lane at Adams Blvd. is a concentrated accident location, which is a safety concern. According to the Traffic Accident Surveillance and Analysis System (TASAS), and the Transportation Systems Network (TSN) reports, the accident rate at this location between October 1, 2010 and September 30, 2013 is 0.23, slightly higher than the average accident rate, which is 0.21. Accident rates are expressed as number of accidents fatal plus injury divided by million vehicle miles. The accident rate considers driving conditions, and if there

were any injuries or fatalities. The vehicles currently existing NB HOT lane off-ramp approach queues onto the mainline which potentially causes an increase in rear end collision type of accidents.

THE NEW 9th
COUNCILMEMBER
CURREN D. PRICE, JR.

March 18, 2016

Mr. Ronald Kosinski RK
Deputy District Director
California Department of Transportation
100 South Main Street
Los Angeles, CA. 90012

Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration (MND)/ Environmental Assessment (IS/EA) Los Angeles County, California District 7-LA-110 PM 20.10/20.92 EA: 07-27800/EFIS #: 0700000537 SCH No. 2013021002

Dear Mr. Kosinski:

Thank you for the opportunity to express my concerns regarding the Mitigated Negative Declaration for the Interstate 110 High-Occupancy Toll Lanes Flyover Project. I have reviewed the MND and I don't feel that it is an adequate environmental document. I had been anticipating a full Environmental Review with the draft to be released early this year. I was hoping that such review would fully explore and address the concerns raised by the surrounding communities as well as the protection of historical assets within the vicinity of the project. This letter will address the following:

- Aesthetics
- Noise Level
- Community Benefits
- Maintenance Agreements
- Vibration
- Project Staging
- Air Quality/Particulates
- Additional Comments

Aesthetics: The MND indicates that there will be no impact to visual aesthetic renderings for the planned project. It shows a very narrow streamlined structure that glides by St. John's Episcopal Cathedral without much intrusion. However, the structure, which would be 55 feet high at its apex, would cast a significant shadow during various points of the day. The structure would Price 1

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further bisect a community that is already divided by the 110 Freeway. The additional intrusion of the flyover may make the area less desirable for filming, charitable races and other special events for which the corridor is known. Price 1

Noise Level: The MND indicates that following construction, the Noise Level would be similar to current conditions. There is no accurate way of measuring the noise impact on the area given the parameters of the project encroaching onto Flower Street which the current conditions do not mimic. Price 2

Community Benefits: The document indicates that Figueroa Way would be turned into a "Pedestrian and Cycling Only" corridor. It further indicates that this would then be landscaped and the design would include decorative permeable pavers. However, this plan does not account for the loss of parking and additional ingress and egress for the adjacent businesses. Price 3

Maintenance Agreements: The treatment to Figueroa Way was described in the MND would have to be maintained. As an example of poor maintenance, a sidewalk that was removed on west bound Adams Blvd to reduce the queuing on the 110 off-ramp led to the installation of the pedestrian bridge but the City declined to provide maintenance on the structure. I am concerned that these types' issues become nuisances when not maintained. There are currently three tunnels and two pedestrian bridges in CD 9 that have had to be closed off due to poor maintenance. Price 4

Vibration: Although the MND addresses construction vibration, it does not address vibration resulting from vehicles traveling over the structure once it is completed. Also, I am concerned about the impact to nearby cultural resources? Price 5

Project Staging: The MND does not indicate where this project will be staged. A quick survey doesn't reveal any suitable property nearby. Price 6

Air Quality and Particulates: The MND indicates that the air quality will worsen but the mitigation efforts are focused on the impact during the construction phase and not what the impact will be once the project is completed. It is important to look at any potential fall-out and how nearby residents will be effected. Price 7

I expect a full Environmental Impact Report. The concerns listed above only highlight a few of the issues that I believe warrant further examination. Price 8

Sincerely,

Curren Price Jr.

CURREN D. PRICE, JR.
Councilmember, 9th District

District Office • 4301 S. Central Ave • Los Angeles, CA 90011 • (323) 846-2651
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Price 1: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was published.

Price 2: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

According to the Community Impact Assessment (August 2015), the proposed project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Commenter has not provided evidence to support the statement that the structure would bisect the community.

Price 3: The commenter's opinion is noted. The noise impact study prepared for the project is in accordance with Caltrans Traffic Noise Analysis Protocol (TNAP-May 2011) which stemmed from Title 23 of Code of Federal Regulation Part 772 (23CFR772). In accordance with TNAP, traffic noise impacts are determined based on the future predicted noise levels at design year (Year 2040 for this project). Future predicted noise levels are determined using noise prediction model which is based on future design year traffic forecasts/data. Future traffic forecasts are conducted in accordance with the travel demand model developed by Southern California Association of Governments (SCAG). The SCAG region encompasses six counties (Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. In their preparation and development for Regional Transportation Plan, SCAG accounts for all planned development and the latest land use/growth assumption in their travel demand model.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

The noise measurement sites were selected taking into consideration the following general site requirements:

- Sites were acoustically representative of areas and conditions of interest
- Sites were located at areas of human use
- Sites were clear of major obstructions between source and receiver
- Microphone positions were more than 10 feet away from reflecting surfaces
- Sites were free of noise contamination by sources other than those of interest
- Sites were not located near barking dogs, lawn mowers, pool pumps, air conditioners, etc.
- Sites were not exposed to prevailing meteorological conditions that are beyond the constraints discussed in the Technical Noise Supplement (TeNs)

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for additional details.

Price 4: As mentioned in Table 10 of the environmental document, there are 10 parking spots within State right of way on Figueroa Way that are being used by the businesses located in the nearby strip mall informally (this area is not leased from the State by any particular business). These 10 parking spots will be used for this project. There is ample parking within the strip mall. The Build Alternative would not result in temporary or permanent adverse effects related to parking. No neighborhood facilities or services that are needed and valued by the neighborhood residents will be temporarily or permanently impacted as a result of the proposed Build Alternative.

According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period.

Price 5: A maintenance agreement will be in place prior to construction of the project.

Price 6: According to the Noise and Vibration Manual (September 2013), there are no Caltrans or Federal Highway Administration standards for vibration. The probability of exceeding architectural damage risk amplitudes for continuous vibrations (such as excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment) from construction is very low, and from freeway traffic is practically non-existent.

However, if vibration concerns involve pavement breaking, extensive pile driving, or trains, 25 feet (7.5 meters) or less from normal residences, buildings, or unreinforced structures, damage is a real possibility. This may also be true if these operations occur within 50–100 feet (15–30 meters) from historic buildings, buildings in poor condition, or buildings previously damaged in earthquakes. In any case, extreme care must be taken when sustained pile driving occurs within 25 feet (7.5 meters) of any building, and 50–100 feet (15– 30 meters) of a historic building, or a building in poor condition. Although, the exact method of constructing the concrete column supports/bents has not been identified at this stage of the design process, Caltrans is only considering the use of vibration reduction construction methods, such as Cast-In-Place Concrete Piles or Jetting, for Alternative 2 (Proposed Build Alternative).

Additionally, construction-related ground disturbance in the immediate vicinity of St. John's Episcopal Church will occur between 160–230 feet from the east side of the St. John's Episcopal Church building. Therefore, no vibration effects to St. John's Episcopal Church building are anticipated. Although there is sufficient distance between the construction site and sensitive receptors, avoidance and minimization measures (summarized in Table 1 of the environmental document) will be implemented during the construction period in order to ensure that ground vibration is kept to a minimum.

With respect to nearby cultural resources, the commenters concerns are noted. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

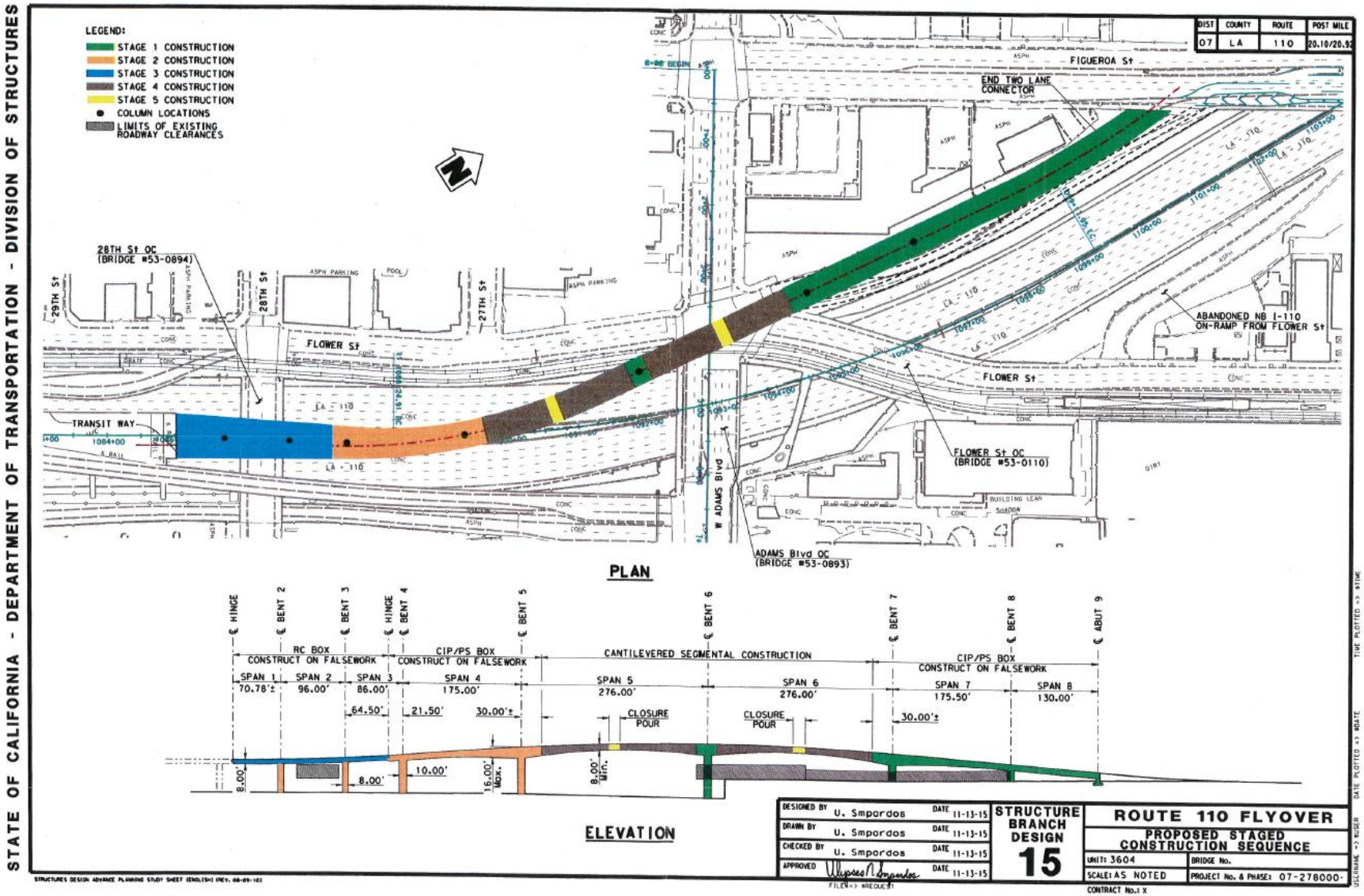
Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Price 7: Refer to the preliminary proposed construction staging plan below:



Price 8: Caltrans is supporting efforts to reduce vehicle miles traveled by planning and implementing smart land use strategies: job/housing proximity, developing transit-oriented communities, and high-density housing along transit corridors. Caltrans works closely with local jurisdictions on planning activities, but does not have local land use planning authority. Caltrans also assists efforts to improve the energy efficiency of the transportation sector by increasing vehicle fuel economy in new cars, light and heavy-duty trucks; Caltrans is doing this by supporting ongoing research efforts at universities, by supporting legislative efforts to increase fuel economy, and by participating on the Climate Action Team. It is important to note, however, that control of fuel economy standards is held by the U.S. EPA and ARB.

Operationally, air quality improvements are anticipated as a result of the proposed Build Alternative because traffic circulation will improve and reduce the delay time, which in turn reduces the amount of time automobiles will idle. Please refer to the Traffic and Transportation section (section 2.1.8) in the environmental document to see improvements in average delay time with the implementation of the proposed Build Alternative.

Price 9: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

February 22, 2016

Without an EIR it is difficult to determine all of the results of the $40 million dollar project. It is impossible to think though, that the results of a $40 million project has no negative impact on the environmentally and historically fragile neighborhood in which it will take place. Carter 1

Caltrans, in its negative declaration, was very demeaning in its description of this area. But- it is the results of Caltrans own actions, cutting through this lovely residential neighborhood years ago- that decimated the area and led to its demise. Now, to use those results as a reason to legitimize further degridation, is abhorrent. Carter 2

We know that the federal government requires mitigation of the impact of freeways. Yet, the Adams Exit off the 110 has never been properly landscaped and cared for. This is true that I know of since 1979 when I first started my home here, 4 parcels west of this off ramp. Carter 3

Right now, it is the ugliest and most uncared for parcel in our entire neighborhood, with weeds 4 feet tall, now sending weed seeds by the wind into all of our yards. No wonder people look askance at our neighborhood when our "front door" entrance is littered with trash, weeds and broken tree branches. Once when I organized an attempt to clean the area, about 13 years ago, Caltrans threatened to have me put in jail. Carter 4

So no wonder Caltrans people who live in cared for areas where Caltrans would not dream of allowing such a nasty sight on its property, write of us and describe us in a dismissive, disparaging way: Concluding that there is no project that could have a negative effect on the little area, because it is already such a negative space the project would make no difference. Carter 5

Opposition to the 110 Flyover of Adams Boulevard at Figueroa Street (hereafter "Project")

Hearing :
February 23, 6 to 8 pm.

Safety for the residents of the little neighborhood that borders on 23rd St from Figueroa St. to Hoover St. (hereafter 23rd St.) is the basis of this opposition.

Freeway convenience seems the only value that Caltrans considers when determining the importance and impact of a project.

It seems Caltrans wants to use this very short length of a 2 lane only residential street to send hundreds and hundreds of impatient drivers from the Harbor Freeway to their next freeway destination:

The Santa Monica Freeway (east and west) which has entrances off Hoover Street, just yards north of 23rd St. Carter 6

The proposed diversion of traffic from the grand Adams Boulevard to the modest 23rd St. endangers the residents of 23rd St. and will have a devastating impact on this little residential neighborhood adjacent and near 23rd St.

If one considers the factual inadequacy of 23rd St. to accommodate more and more vehicles, which it appears Caltrans has not considered, there looms the conclusion that this illogical and dysfunctional project may be just the first phase of "The Project". Were the project implemented as now intended the debacle would be so serious that the only remedy would be eminent domain procedures to widen 23rd St. to facilitate the increased traffic and try to eliminate the snarls and delays concomitant with the traffic.

Twenty-third Street deficiencies which make it unsuitable and dangerous for increased, through traffic: Carter 7

It is currently dangerous for residents (hereafter "Locals") to exit enter their driveways to enter 23rd. St.

This little stretch of neighborhood street has parking on both sides. The parking blocks sight of oncoming cars from both directions.

Locals must inch out of their driveways for access to 23rd St. until their cars are halfway into the lane where finally they can see, beyond the parked cars, on-coming traffic. Every time I exit my driveway I hold my breath and hope this is not the time I wind up in a wheel chair for life.

23rd St. is so narrow in places that Locals, whether turning left or right, are forced to cross over the dividing line possibly into on-coming traffic, to make their turn.

Carter 7

It is impossible to open a car door if a car is approaching on the same side of the street. When people parked on the street open their cars doors, cars zoom past coming very close to them because there is just so little lane room on 23rd St.

City buses and other large vehicles using 23rd St. routinely cross over dividing lines because the area between parked vehicles and the middle dividing lines are too narrow for them. 23rd. St. has no extra space to accommodate mishap.

Carter 8

Emergency vehicles cross over the dividing lines as there is absolutely not enough space in the lane for a fire truck to stay only in its east or west lane.

Carter 9

It would be easy, and likely, for Caltrans to say, " Well then, we will simply prohibit parking on 23rd. St. to Hoover St." This decision would ignore that our parking problem exists because of short-sighted planning years ago. The City allowed large apartment buildings to be constructed with not one parking place required. The locals, very hardworking family people, need on- street parking because there is no other parking available to them.

Carter 10

3 of

It would be a travesty for Caltrans, because of short-sighted planning now to dump traffic into this little neighborhood to save transient drivers a few minutes.

Carter 10

And, even without parking or restricted parking hours, the street is not designed even for the traffic it now has. It would be even more dangerous were vehicles diverted from the widely spacious Boulevard of Adams to the inadequate local lanes of high density residential 23rd St.

Carter 11

23rd St. was restricted to vehicles weighing more than 6,000 pounds many years ago. It was recognized by the City of Los Angeles that 23rd St. was intended for local use only so it deemed that vehicles above 6,000 pounds are prohibited from using it.

Carter 12

Many SUV's (considered by the IRS as "trucks") making a fast run to the 10 freeway would be prohibited from using 23rd St. because they weigh 6,000 pounds –or more. [*]

23rd St. is now a very dangerous street for pedestrians. This modest neighborhood has a walking population. People walk to catch busses for work and shopping and school children walk. Within a radius of ½ mile there are 4 schools from mid-point of 23rd St. There is a lot of bike traffic with absolutely no provision for it. There is no room between the parked cars and the traffic. Most drivers do not leave sufficient distance between the cars and the bikes.

There are 2 cross- walks (other than signal lights) on 23rd St. These crosswalks are very dangerous not only for pedestrians but for drivers who stop for pedestrians who are using them.

Carter 13

First, most drivers do not stop. 23rd St. is already too busy with most drivers ignoring the non signal cross- walks. Locals honor it more. When a stop is made non-local traffic is coming so fast there is a danger of being rear- ended . Worse, often a speeding car passes the waiting car nearly hitting pedestrians in the cross-walk. A stop for pedestrians has to be made

4 of

very carefully. We have 2 such crosswalks that do not have signal lights in this short span of 23rd St. With increased traffic they are death traps.
Just compare the facts of Adams Boulevard with the facts of 23rd St.
It should be considered that while 23rd St. is almost all high density residential buildings, most have not one parking space. Adams Boulevard however, is lined with large buildings used for institutional purposes with onsite parking as well as grand exits and entrances. The apartments on Adams Boulevard also have large onsite parking structures because they were built when the zoning required parking.

As an example: on all of Adams Boulevard on the north side of the street there are only 7 driveways. On only the **first block** of the 23rd St. neighborhood, there are 7 driveways. This is an area that is so congested by traffic impediments that it boggles the mind. (See below ***)

Look at these facts:

Total driveway entrances:
Adams Boulevard-15 (+/-)
23rd St.-51

Side street entrances:
Adams Boulevard-6
23rd St.- 15 most without signals

It must be considered that the block long part of 23rd St. as one turns west onto 23rd from Figueroa has 2 designated lanes going west (it is the bridge that crosses the 110 and has no structures on it .) Upon entrance to the residential area on 23rd. St. (the second block east of Figueroa) the lanes are reduced, without warning, to only one lane. Drivers must immediately and without warning merge into one lane only.

+++Astonishingly , at this one point of convergence there is:
a sudden merge from two lanes to one lane;
a freeway exit;
a cross walk;

5 of

Carter 13

a school location with hundreds of kids using the cross walk at various times of the day.

Carter 13

Conclusion:

Caltrans, it seems, wants to divert thousands and thousands of cars to a narrow, inadequate, already dangerous local neighborhood street in an attempt to save transient traffic a few minutes each a day. This attempt would cost millions and millions of dollars. The cost to the little neighborhood would be devastating.

And really, because 23rd Street is so narrow and already has too much fast car traffic and lots of foot traffic, bikes and skate boards, the addition of hundreds of more vehicles would result in more fender benders than saved minutes. I do not know how to calculate the serious injuries.

Carter 14

What a sad result that locals turning left into their driveways would create more time wasted and more danger for through traffic than the existing situation at Adams.

In the face of the incontrovertible deficiencies of 23rd St. Caltrans has declined to provide alternatives. How strange.

6 of 6

Patsy Carter,
657 and 663 West 23rd. St.
LA CA 90007

[*] Many of the following SUV's are prohibited from using 23rd St. because they weigh over 6,000 pounds:
Chevy Tahoe, Silverado and Suburban, Cadillac Escalade, Ford Expedition and Excursion; Many others.

Carter 1: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

Carter 2: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Carter 3: Avoidance, minimization, and/or mitigation measures will be implemented to ensure any potential impacts will be minimized. The issue at the Adams Blvd. Exit is outside of the project scope, therefore, cannot be addressed.

Carter 4: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Carter 5: The commenter's opinion is noted. The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Carter 6: The commenter's opposition to the project is noted. The proposed project will not redistribute the traffic to 23rd Street and adjacent streets. With or without proposed project, northbound travel demand on Figueroa Street approaching 23rd Street will approximately be the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction.

Carter 7: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 8: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 9: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 10: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 11: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 12: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 13: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter 14: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

South Coast
Air Quality Management District
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SENT VIA E-MAIL AND USPS:
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March 18, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
100 South Main St., MS 16A
Los Angeles, CA 90012

Draft Mitigated Negative Declaration (Draft MND) for the Proposed I-110 High-Occupancy Toll Lane Flyover Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final MND. The Project proposes to construct an elevated off-ramp structure on the northbound Interstate 110 freeway (I-110) between the 30th Street and the Figueroa Street overcrossing, located in the city of Los Angeles.

In the Air Quality Analysis, the project's air quality emissions during construction were quantified but not compared to the SCAQMD's recommended regional and localized CEQA thresholds to determine significance. In Table 5 – Summary of Construction Emissions, the maximum daily NO_X emissions are 109.2 lbs/day, which exceed the SCAQMD regional threshold of 55 lbs/day. In order to reduce the project's construction impacts, SCAQMD staff recommends that additional mitigation measures be included to reduce these impacts to a less than significant level. Additional details are included in the attachment. Wong 1

The proposed project is also adjacent to sensitive land uses[1] (i.e., school to the northwest and hospital to the southeast); however, the Draft MND did not evaluate potential localized air quality impacts resulting from construction of the proposed project. Therefore, the SCAQMD staff recommends that the lead agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be analyzed using SCAQMD's Localized Significance Methodology[2]. Wong 2

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing the Final MND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JC
LAC160126-04
Control Number

[1] California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: http://www.arb.ca.gov/ch/landuse.htm
[2] The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: http://www.aqmd.gov/ceqa/handbook/LST/LST.html

Attachment

Additional Construction Mitigation Measures

Based on the air quality analysis in the Draft MND, the proposed Project will exceed the SCAQMD's CEQA regional construction significance thresholds for NO_X. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measures be included in the Draft MND, in addition to the measures proposed by the lead agency, in order to minimize or eliminate significant adverse air quality impacts:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)[3] have enacted, require all on-site construction equipment to meet the following:
  - All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment. Wong 1
  - Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:

    http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Improve traffic flow by signal synchronization.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.

[3] For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

Wong 1: In accordance with the latest Caltrans Standard Specifications (dated 2015), all construction equipment shall comply with air pollution control rules, regulations, ordinances, and statutes that apply to work performed under all Caltrans' construction contracts. Other measures related to temporary traffic control, rerouting of construction trucks, and signal synchronization will be considered during the development of a traffic management plan for the project.

Wong 2: According to 40 CFR93.123(c)(5), hot-spot analyses are not required to consider construction related activities that cause temporary increases in emissions. Temporary increases in emissions are defined as those that occur only during the construction phase and that last five years or less at any individual site. The proposed project has construction duration of approximately 2.5 years. Emissions from the construction activities, therefore, may be considered temporary pursuant to 40 CFR93.123(c)(5) and are not included in the hot-spot analyses.

Recognizing the proximity to populated areas and the potential for meaningful differences in emissions among project alternatives, however, Section 4.2.4 of the September 2015 Air Quality Analysis provides quantification of mobile sources air toxics (MSATs) in accordance with the FHWA's Interim Guidance for MSATS dated December 2012.

As the CEQA Lead, Caltrans determines applicability of utilizing thresholds to evaluate the significance of certain impacts. Caltrans has not currently approved or adopted use of locally adopted CEQA thresholds of significance; but determines significance of impacts based on a project-by-project basis and upon the context of applicable CEQA checklist questions. For informational purposes, however, temporary construction emissions were estimated using the SMAQMD's latest Roadway Construction Emissions Model. A summary of construction emissions estimates is provided in the appendix to the September 2015 Air Quality Analysis.

Furthermore, measures will be implemented to minimize and reduce the level of fugitive dust emissions. To address the potential for localized particulate emissions from heavy-duty trucks and construction equipment adjacent to sensitive receptors, appropriate measures will be implemented during construction activities in accordance with the Caltrans' Standard Specifications and local ordinances. Construction activities for the project will also implement and adhere to all applicable rules enforced by SCAQMD, including Rules 401, 402, and 403. Avoidance, minimization and/or mitigation measures for construction impacts are described in Section 2.2.4 of the environmental document.

Mr Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

These are my statements as to why I support the no build option for the proposed Interstate I-110 HOT Flyover to Figueroa Way. My statements describe only a few of the many ways our historic residential neighborhood will be negatively impacted by this proposed project. Carter-Davis 1

The flyover will dump a high volume of traffic onto 23rd Street that previously used Adams Blvd to go to the entrance to I-10 West off of Hoover Street. 23rd Street is a narrow residential street that is congested with neighborhood car, bike and foot traffic. Carter-Davis 2

There are many apartment buildings on 23rd street that have no off-street parking. This means that the street is always full of parked cars. Traffic on 23rd street is often stopped for cars that are parallel parking. Traffic is also stopped by cars turning into their driveways and onto side streets. Even if you are making a right hand turn, you often have to wait (stopping traffic behind you) because of the heavy pedestrian traffic (including skateboarders and bicyclers) on 23rd street. Carter-Davis 3

Not only does 23rd street only have one lane in each direction, the lanes are narrow. There is not enough space in the lane to move around an open door of a car so cars are often forced into the oncoming lane. Buses and emergency vehicles do not fit in the space allowed by the lanes and use part of the lane for oncoming traffic. Carter-Davis 4

There is a school on the corner of Figueroa and 23rd street with 700 students that pour onto the streets just as rush hour is beginning. The parents of these kids are stopped along the narrow 23rd street waiting to pick up their children and then making turns in the middle of the block. This is not an area that can handle additional traffic. Carter-Davis 5

And even if 23rd street could handle additional traffic, the street has a 6000 pound vehicle weight limit. Obviously not designed to be a throughway, but designed to be residential.

There are 15 side streets (counting both sides of the street) that enter onto 23rd street between Figueroa and Hoover, and there are 51 residential driveways. Most without traffic lights. With increased traffic on 23rd street, the residents would never be able to turn onto 23rd street from their driveways and from the side streets. And by the way, there are only 6 (3 on each side) side streets entering onto Adams Blvd between Fig and Hoover. Carter-Davis 6

It seems that Caltrans is proposing an extremely expensive and extremely impactful solution, which will not even be a solution. There is no way that 23rd street can handle the increased traffic from this proposed project. The traffic on 23rd street stops often due to all the parking and driveways and side streets. The flow of traffic is also greatly interrupted at rush hour as parents stop in no stopping zones to pick up their children after school. These are the characteristics of a small residential road. These are the characteristics of 23rd street between Figueroa and Hoover. So dumping freeway traffic onto 23rd street would not make traffic congestion better. In addition, the drivers coming off the freeway and dumping onto 23rd street would not be looking for all these conditions that normally exist on a small narrow residential road. The mismatch between the increased traffic and the characteristics of our small, narrow residential road is a recipe for disaster. Carter-Davis 7

In addition, Caltrans is attempting to treat the symptom and not the cause. Much of the traffic congestion at Adams and Fig is caused by improper use of the crosswalks – pedestrians are constantly crossing when not allowed which prevents cars from making right and left turns. If you simply enforced pedestrian rules for using the crosswalks at fig and Adams, traffic congestion at that intersection would be greatly reduced. I'm surprised that Metro is not pushing for proper used of crosswalks throughout the city of Los Angeles. I imagine enforcement of these laws would net them a tremendous savings. Not to mention less traffic gridlock and improved air quality for all of us! Carter-Davis 8

Another condition that is causing traffic to back up on Adams as you approach Fig is the driveway to the strip mall on the NW corner of Adams and Fig. This driveway is not wide enough for cars to enter an exit at the same time. So any car trying to enter the mall from Adams must stop and hold up traffic if a car is trying to exit. This condition could be rectified by making that driveway and exit only. Carter-Davis 9

These two proposed improvements are practically free compared to the multi-million dollar cost of the flyover. In addition, the probability of improvement is far greater than the proposed flyover. And the probable impact to our neighborhood.

The flyover is proposed to speed traffic off of I-110 into downtown. But what about the traffic backup at the light at Washington and Figueroa. Caltrans is proposing this multi-million dollar project to relieve traffic on one half of one block on Adams Blvd. What about the back up of traffic on Figueroa Street approaching Washington? At rush hour you must sit on the south side of Washington through several lights before you can get across Washington and continue north. What good will it do if you get more cars into this backup faster? Carter-Davis 10

If you need another exit from the freeway, why not put an exit onto Washington Blvd which has four lanes in each direction at Fig – compared to the one lane in each direction on 23rd street? In addition, Washington is not a residential street where the freeway is located.

Now take a look into the future if the flyover were to be constructed... Traffic on 23rd street will be unbearable. Residents will not be able to get out of their driveways. Residents will not be able to get out of their cars when parking on the street. Pedestrians will not be able to cross the street except at the lights. We've already had a fatal hit and run on 23rd street in the last year as someone was speeding through our neighborhood. Carter-Davis 11

Traffic on 23rd street would be a nightmare, and the proposed fix for it would be to widen the road to handle all the increased traffic. So, Caltrans will now want to take property from the homeowners to try and fix the horrendous conditions created by implementing this proposal. There is no way that you cannot call taking our property a negative impact for us. Carter-Davis 12

I would like to know the number of cars that would be excluded from using Figueroa Way. All the cars traveling West on Adams that currently use Figueroa Way, would no longer be able to use it. All the cars using the general purpose lanes on the Fwy exit at Adams would no longer be able to use it. Carter-Davis 13

There will be a perceptible increase in the noise level. Caltrans has admitted that by saying it's almost imperceptible. Well that means it's perceptible and will add to an already noisy offramp area. That's a significant negative impact. Carter-Davis 14

Caltrans promises to beautify the area. Please take a look at the southbound Adams offramp from I-110 and see how Caltrans has "beautified" our neighborhood to date. This offramp is a visual blight on our neighborhood. How can we expect differently from what they've shown us so far? Carter-Davis 15

Caltrans has not done the necessary studies to say that there will not be a negative impact on our community. Carter-Davis 16

I would also like to take issue with the meeting that Caltrans and Metro called a public hearing. This meeting was not a public hearing as they did not provide a forum for the public's questions to be answered in public. They suggested that we ask our questions to unknown individuals at the back of the room. Well, I asked questions, but the individual I addressed could not answer my questions. What was this, a scavenger hunt? Because it was not a public hearing. Carter-Davis 17

Please support no build; this project makes no sense! Carter-Davis 18

Lisa Carter-Davis
657 W 23rd St #2
Los Angeles, CA 90007

Carter-Davis 1: The commenter's support for the No Build Alternative is noted.

Carter-Davis 2: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 3: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 4: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 5: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 6: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 7: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 8: The commenter's opinion is noted. Concerns over crosswalk issues are outside Caltrans' jurisdiction. The City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 9: The commenter's opinion is noted. This suggestion is outside Caltrans' jurisdiction. The City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 10: The main purpose of the proposed project is that it will allow motorists to bypass the existing bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off- ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street. Therefore, with or without the proposed project, the travel demand on northbound Figueroa Street approaching Washington Blvd. will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the traffic originally accessing Figueroa Street via Adams directly onto Figueroa Street via Figueroa Way.

Washington Blvd. off-ramp is not in the scope of the work of this project. However, extension of the HOT elevated structure up to the Washington Blvd. would require more bents to be constructed at extremely critical locations. Further, long-term local streets and freeway closures will be required. Lastly, a longer construction period would be required, which would increase potential impacts as well as construction costs.

Carter-Davis 11: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 12: The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Carter-Davis 13: The existing traffic volumes using Figueroa Way is approximately 418/251 (vehicles per hour) during am/pm (morning/afternoon) peak hours. The 2018 (without project) traffic volumes using Figueroa Way is approximately 435/261 (vehicles per hour) during am/pm (morning/afternoon) peak hours. The existing traffic volumes making right-turn onto northbound Figueroa Street is approximately 506/349 (vehicles per hour) during am/pm (morning/afternoon) peak hours. The 2018 (without project) traffic volumes making right-turn onto northbound Figueroa Street is approximately 526/363 (vehicles per hour) during am/pm (morning/afternoon) peak hours. The 2018 (with project), Figueroa Way will be closed to traffic at grade level. The 2018 (with project) traffic volumes making right-turn onto northbound Figueroa Street decreases to approximately 105/26 (vehicles per hour) during am/pm (morning/afternoon) peak hours. In conclusion, most of the traffic that is currently exiting the HOT off-ramp are traveling northbound Figueroa Street via Figueroa Way or making a right-turn at Figueroa Street. The proposed ramp will significantly decrease the traffic congestion at the analyzed intersections of Adams Blvd. at the off- ramp/Flower Street/Figueroa Street by diverting the traffic to directly access northbound Figueroa Street via Figueroa Way. Refer to Tables 18 and 19 of the environmental document for am/pm peak hour Level of Service (LOS).

Carter-Davis 14: The commenter's opinion is noted. The noise impact study prepared for the project is in accordance with Caltrans Traffic Noise Analysis Protocol (TNAP-May 2011) which stemmed from Title 23 of Code of Federal Regulation Part 772 (23CFR772). In accordance with TNAP, traffic noise impacts are determined based on the future predicted noise levels at design year (Year 2040 for this project). Future predicted noise levels are determined using noise prediction model which is based on future design year traffic forecasts/data. Future traffic forecasts are conducted in accordance with the travel demand model developed by Southern California Association of Governments (SCAG). The SCAG region encompasses six counties (Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. In their preparation and development for Regional Transportation Plan, SCAG accounts for all planned development and the latest land use/growth assumption in their travel demand model.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for additional information.

Further, the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Carter-Davis 15: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

One of the mitigation measures discussed in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a shortcut to access the surrounding community.

Carter-Davis 16: The commenter's opinion is noted. The topics that have been evaluated in the environmental document are:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)
- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography
- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Further, The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

Carter-Davis 17: The commenter's opinion is noted. The purpose of a public hearing is to provide the community an opportunity to communicate their thoughts and concerns about the proposed project. Caltrans Staff was available at the February 23, 2016 public hearing to answer questions. Members of the public had several options to submit their comments/questions, which are as follows:

- Fill out a comment form and submit it at the February 23, 2016 meeting or mail it back
- Mail letters to:

  Mr. Garrett Damrath, Chief Environmental Planner
  Caltrans District 7, Division of Environmental Planning
  100 South Main Street, MS 16A
  Los Angeles, CA 90012

- Provide oral comment at the February 23, 2016 public meeting

Carter-Davis 18: The commenter's support for the No Build Alternative is noted.

March 21, 2016

GBD

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

Re: Interstate I-110 HOT Flyover to Figueroa Way
Draft MND and IS/EA
EA: 07-27800/EFIS# 0700000537

Dear Mr. Damrath,

This is letter is to express my opposition to the above project. Arnold 1

I am a 15 year resident of the West Adams neighborhood. I spent 7 ½ years on the Historic Preservation Overlay Zone board in University Park, which is immediately adjacent to the project site. I am also an architect and I am a partner in a firm that specializes in multi-family housing. I generally consider myself pro-development, and have been continually one of the most "liberal" voices in the neighborhood about fitting new development into our historic neighborhoods.

I cannot support this project at all for a number of reasons:
• The impacts on the neighborhood will be nothing but negative. West Adams, and in particular this area at the intersection of the 10 and the 110, was one of the most highly impacted neighborhood from freeway construction. Multiple ramps, cloverleaves, overpasses and trenches cleaved this neighborhood destroyed its architecture, and makes it less livable to the present day. Freeways are noisy, polluted, and disruptive to life on ground. Land near freeways is unfit for human occupation, yet we're forced to do it.
• St. John's Cathedral is one of the architectural gems of the city, inside and out. It is a genuine sanctuary that bridges traditional and early modern architecture. It is a quiet place. It has a presence on the street. It is well designed and viewable on all sides. Having a concrete flyover yards away with the 24/7 hum of traffic, tracing headlights, and pollution will significantly negatively impact this building. A concrete overpass will cast a shadow of darkness and dirt. And let's be honest, the mere *presence* of an overpass – it's negative affect on architectural space and perceived quality of the streetscape, things that are difficult to measure but very real – is undeniable. Arnold 2
• Caltrans presentations describing the "seconds" saved off certain people's chosen commutes is no compensation for the permanent dirty ugliness that residents and visitors will have to live with 24/7.
• Everyone knows that if a space is created for more traffic, that space will be filled. If (IF) any problem is solved by this project, whether it's eased commutes or slightly less congestion on a city street, those problems will resurface in due time. Caltrans should be encouraging and building public transit, not promising easier commutes.

This project is a wasteful boondoggle, seemingly to keep Caltrans busy, that speciously "solves" a problem while creating a permanent negative impact on the environment of the neighborhood below, a neighborhood which will only be hurt, not served, by the flyover. Thank you for considering my viewpoint.

John Arnold
2166 W. 30th St.
Los Angeles, CA 90018

Arnold 1: The commenter's support for the No Build Alternative is noted.

Arnold 2:

- The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

  Further, there are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

  Access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

- The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

  The noise impact study prepared for the project is in accordance with Caltrans Traffic Noise Analysis Protocol (TNAP-May 2011) which stemmed from Title 23 of Code of Federal Regulation Part 772 (23CFR772). In accordance with TNAP, traffic noise impacts are determined based on the future predicted noise levels at design year (Year 2040 for this project). Future predicted noise levels are determined using noise prediction model which is based on future design year traffic forecasts/data. Future traffic forecasts are conducted in accordance with the travel demand model developed by Southern California Association of Governments (SCAG). The SCAG region encompasses six counties (Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura) and 191 cities. In their preparation and development for Regional

Transportation Plan, SCAG accounts for all planned development and the latest land use/growth assumption in their travel demand model.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for additional information.

- The commenter's opinion is noted. The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

- One of the mitigation measures discussed in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a shortcut to access the surrounding community.

- The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demand on Figueroa Street will be approximately the same.

  The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

The commenter's opinion is noted. The commenter has not provided substantial evidence to support the statement that there will be a permanent negative impact on the community as a result of the proposed Build Alternative.

National Trust *for* Historic Preservation
Save the past. Enrich the future.

March 21, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration (MND)/ Environmental Assessment (IS/EA)

Dear Mr. Damrath:

On behalf of the National Trust for Historic Preservation, I would like to thank you for the opportunity to comment on the Proposed Mitigated Negative Declaration (MND)/Environmental Assessment (IS/EA), Interstate 110 High-Occupancy Toll Lanes Flyover Project.

As a major transportation project that has the potential to impact historic and environmental resources, the Interstate 110 High-Occupancy Toll Lanes Flyover Project must comply with the California Environmental Quality Act (CEQA). This project has the potential to seriously impact the West Adams historic district and National Register-listed cultural resources, including St. John's Cathedral and the St. John's Parish House.

Sanada 1

In general, the Proposed MND/IS/EA fails to adequately evaluate the adverse impacts of the proposed project and fails to fully evaluate potential alternatives to the project. Further, proposed mitigations do not address adverse impacts of the proposed project and we are especially concerned about the suggestion that proposed mitigations would "reduce potential effects to insignificance", resulting in "no significantly adverse effect" to the West Adams neighborhood. Caltrans must conduct a full Environmental Impact Report/Environmental Impact Study to explore all alternatives and identify mitigation that truly reduce potential impacts to important cultural resources.

Interests of the National Trust

The National Trust for Historic Preservation is a private, nonprofit organization chartered by Congress in 1949 to facilitate public participation in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. 54 U.S.C. §§ 320101, 312102. With the strong support of its members across the nation, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

The National Trust has decades of experience working for better transportation solutions in Southern California, including our work to shine a national spotlight on the devastating threat posed to historic communities by the proposed I-710 North freeway extension. Further, as a consulting party in the Alaska Way Viaduct Replacement Project in Seattle, Washington, the National Trust has knowledge and expertise about the impacts to historic resources that can occur as a result of a major freeway projects.

I. Caltrans Has Not Adequately Explored Alternatives.

We are particularly concerned that Caltrans has failed to fully explore alternatives that could avoid or greatly reduce adverse impacts to cultural resources. While eleven alternatives are listed in the proposed MND/IS/EA, there is insufficient detail to explain why all but two of the alternatives were rejected. Alternative 11, a Transportation System Management and Transportation Demand Management Alternative, for example, could minimize impacts to cultural resources, yet inexplicably did not warrant analysis at the level of the preferred alternative.

Sanada 2

II. Caltrans Has Failed to Identify Mitigations to Reduce Adverse Impacts.

We are concerned that Caltrans has failed to propose adequate mitigations to address potential adverse impacts. The mitigations outlined in the proposed MND, such as interpretive features and mobile exhibits, will certainly enhance public knowledge of the area, but they would not address the visual impacts of a 54-foot concrete flyover just yards away from St. John's Cathedral and surrounding cultural resources. They also would not address the massive physical barrier that will effectively split the neighborhood. The proposed mitigation measures would not reduce the impacts of the proposed project to a level of "less than significant."

Sanada 3

To address these concerns a full EIR/EIS is absolutely necessary. An EIR/EIS will provide a level of detail needed to ensure that potential adverse impacts are properly identified and evaluated, that alternatives are thoroughly explored and analyzed, and that any mitigation measures are appropriate.

Sanada 4

We look forward to a full EIR/EIS to ensure that any proposed project is sensitive to and compatible with this irreplaceable part of Los Angeles' unique heritage. Thank you for considering the comments of the National Trust for Historic Preservation.
Please feel free to contact me if you have any questions.

Sanada 5

Sincerely,

Kevin Sanada
Field Officer

cc: Julianne Polanco and Natalie Lindquist, California State Historic Preservation Officer
Ken Bernstein, Office of Historic Resources, City of Los Angeles
Jean Frost, West Adams Heritage Association
Adrian Scott Fine, Los Angeles Conservancy
Cindy Heitzman, California Preservation Foundation

Los Angeles Field Office
700 South Flower Street, Suite 1100 Los Angeles, CA 90017
E info@savingplaces.org P 213.232.1123 www.PreservationNation.org

Sanada 1: Commenter's opinion is noted. Commenter has not provided evidence to support the claim that the environmental document fails to fully evaluate adverse impacts. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The commenter states that the environmental document also fails to evaluate potential alternatives to the project. Thirteen (13) alternatives were considered (eleven (11) alternatives were considered but eliminated from further discussion for various reasons, which are explained in Section 1.6 of the environmental document). The remaining alternatives are the No Build and the Build Alternatives.

The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. The California State Historic Preservation Officer (SHPO) had no objections to the finding of adverse effect on St John's Episcopal Church, but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Commenter's suggestion of completing an EIR/EIS is noted. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Sanada 2: The reason for rejection of the eleven alternatives is provided in section 1.6 of the environmental document. Once an alternative is determined to be infeasible, the alternative is not studied in further detail.

The commenter believes Alternative 11 would reduce potential impacts to cultural resources and questions why it was not studied in further detail as was the proposed Build Alternative.

Alternative 11: Transportation System Management and Transportation Demand Management Alternative. Transportation System Management (TSM) strategies consist of actions that increase the efficiency of existing facilities; they are actions that increase the number of vehicle trips a facility can carry without increasing the number of through lanes. Examples of TSM strategies include ramp metering, auxiliary lanes, turning lanes, reversible lanes, and traffic signal coordination.

Transportation Demand Management (TDM) encourages public and private transit, ridesharing programs, and bicycle and pedestrian improvements as elements of a unified urban transportation system. TDM addresses traffic congestion by reducing travel demand rather than increasing transportation capacity and focuses on alternatives such as ride sharing, flextime, increased transit usage, walking, and bicycling. TDM focuses on regional strategies for reducing the number of vehicle trips and vehicle miles traveled and increasing vehicle occupancy. It facilitates higher vehicle occupancy or reduces traffic congestion by expanding the traveler's transportation choice.

Reason for Rejection: Because TSM strategies currently are employed in the project area (HOT and auxiliary lanes) and traffic congestion is still prevalent, TSM measures alone will not address the existing capacity deficiency of the current conditions. Multi-modal alternatives integrate multiple forms of transportation, such as pedestrian, bicycle, automobile, rail, and mass transit. Because a range of transportation options is currently available in the project area and traffic congestion is still prevalent, multi-modal alternatives alone will not be adequate to meet the purpose of and need for the Proposed Project.

Further, Alternative 11 does not meet the purpose and need of the project.

Sanada 3: The commenter's opinion is noted. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Sanada 4: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Sanada 5: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

N. U. P. C. A.
NORTH UNIVERSITY PARK COMMUNITY ASSOCIATION
P.O. BOX 15881 UNIVERSITY PARK CALIFORNIA 90015 (213) 748-1656

March 21, 2016

Garrett Damrath, Senior Environmental Planner
Division of Environmental Planning
Caltrans, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

RE: Proposed MND -
EA: 07-27800/EFIS #: 0700000537
SCH No. 2013021002
Interstate 1-110 HOV/HOT Connector Project
Adams Blvd. to Figueroa Way

Dear Mr. Damrath and Administrators:

By putting forward a Mitigated Negative Declaration (MND) for this proposed project, Caltrans is – essentially – stating that a 54-foot-high flyover structure would have no long-term impact on my community. This notion flies in the face of reality, is offensive at best, and is legally indefensible, especially in light of your agency's recent "Finding of Adverse Effect" for the very same proposed project, but in the context of a required federal review. NUPCA 1

I am writing this comment and those that follow on behalf of the North University Park Community Association (NUPCA). We have been engaged in advocacy related to historic preservation and land use in University Park and the larger Historic West Adams District for three decades. I have personally served as NUPCA's representative to the Community Redevelopment Agency's Exposition-University Park Project Area (which is adjacent to this project site) since 1989, and am very familiar with the environmental setting in which this project is proposed.

I am also attaching my initial February 2013 NOP comment letter, addressed to you, Mr. Damrath, to which you never replied and, importantly, you failed to follow the requirement (as set forth by Alison Morrow of the Caltrans staff) that "*the Department must mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing…*" You failed to send any notification to me at my home address, as requested (Metro, conversely, notified me, as did others in the community.) NUPCA 2

I am also concerned that Caltrans chose to publish the notice of the public hearing in the *Downtown News* rather than the *Los Angeles Times*. The *Downtown News* is NOT a newspaper of general circulation. It is a weekly publication focused exclusively on Downtown Los Angeles with an audited circulation of 40,000, of which only 1,800 copies are distributed within the actual location of the project – which is NOT in Downtown Los Angeles, but rather on the eastern edge of the West Adams District/University Park neighborhood in the South Los Angeles Community Plan area. It straddles as well the Southeast Community Plan area. NUPCA 3

Basically, you chose a newspaper that does not circulate within the actual impact area, and you had a better choice: the *Los Angeles Times*.

Common sense appears to be an element lacking in Caltrans' approach to evaluating solutions to the "problem" you have created by converting the high occupancy vehicle (HOV) lanes on the 110 freeway to a combination HOV and toll road (HOT), thus apparently dramatically increasing traffic. Quoting from a news story that appeared on the website, L.A. Streetsblog:

"…The project contradicts much of Metro's language about how its ExpressLanes were intended to work. ExpressLanes, in theory, use existing excess freeway HOV lane capacity, selling it in the form of toll lanes. There are many worthwhile projects that have come from Metro's ExpressLanes program, and it has been important in demonstrating how congestion pricing can work. But now increased toll-paying car traffic is the impetus behind this new flyover ramp and, previously, the removal of the sidewalk on a section of Adams to increase the capacity for cars. So, Metro's toll lanes are not all about existing capacity, but also about continuing to increase car capacity, at great costs in both public dollars and impacts to neighborhoods." NUPCA 4

In any case, your choice to propose an MND, and to only evaluate the project itself and the "no build" alternative, without actually evaluating (publicly) any other method to reduce the traffic on the Adams Boulevard exit, lacks transparency and seemingly a basic common sense element: Can we change the current exit strategy to achieve the same goal (e.g. reduced wait time in certain specific hours/days at Adams)? What about diverting non-HOV/HOT vehicles away from westbound Adams? What about closing the non-HOV/HOT offramp completely and instead require those drivers to exit further south or further north (although is it true that Caltrans has already closed the next exit ramp north?) And how exactly does the proposed closure of Figueroa Way help with congestion on westbound Adams? At least now vehicles that are traveling west on Adams with the intention to turn north on Figueroa have an alternative to skip that intersection and catch up on their northbound journey at 23rd Street. NUPCA 5

Moreover, it defies rational thought to think this proposed flyover would not have aesthetic and actual impacts on University Park's myriad adjacent historic resources. An elevated bridge of this magnitude would certainly have incompatible massing and scale adjacent to a roster of designated historic resources, including St. John's Episcopal Cathedral, the Automobile Club of Southern California, St. Vincent's Cathedral, the NUPCA 6

Stimson Residence, the Woolen Mills Zanja, the Slauson Residence, and, of course, the Chester Place National Register Historic District. For reasons that remain murky, the Caltrans team decided that with the exception of St. John's, most of these other resources were somehow outside your defined impact area. NUPCA 6

In my initial comments to the NOP, I had also asked you to evaluate the impacts this project will have on the adjacent residential community of University Park (particularly traffic circulation – so-called "cut-through traffic" that may result from a new terminus at or near 23rd Street). Several speakers addressed the same issue at the public hearing in late February. The MND evaluates, somewhat, the impacts of the project on the intersection of Figueroa and 23rd Street, but it does not examine the impacts of the project on traffic, both eastbound and westbound, on 23rd Street between Hoover/Union on the west and Grand on the east. Please do not say there would be no impact; HOV/HOT commuters who really wanted to go west on Adams into the West Adams District proper would more-or-less now be forced to take 23rd Street westbound to Hoover (or cut through one of the local streets) to get back to Adams Boulevard and the remainder of their journey. NUPCA 7

In our later "courtesy" meeting at St. John's, to which "insiders" were invited, I specifically asked for more evaluation of the sway factor of a bridge during a seismic event. As you are no doubt aware, a CHP officer lost his life in the north San Fernando Valley during an earthquake when an elevated freeway bridge swayed and broke. Engineers have determined, according to a former SCAQ official, that flyovers and similar elevated freeway structures DO sway during a major earthquake – and I think when you are proposing a 55-foot-high flyover adjacent to a very important historic structure, and adjacent to major multi-family residential buildings, and OVER a light rail train, one would hope your team would have followed through and investigated this potential impact. NUPCA 8

Please review as well my attached NOP comment letter for additional concerns. In any case, every aspect of this proposed project would seem to have its own related impact, and an MND is not the document that is proper to evaluate those impacts. Nor have you made attempts to analyze certain of the impacts. Nor have you fully explored alternatives. For all of these reasons, plus the fact that the failure to do an EIR does not appear to be legally defensible (I do know I am repeating myself, you really should do an EIR. NUPCA 9

Thank you very much for your consideration.

Cordially,

Laura Meyers

Laura Meyers, on behalf of NUPCA

1818 South Gramercy Place Los Angeles, CA 90019
323-737-6146
lauramink@aol.com

NUPCA 1: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

NUPCA 2: Caltrans is not required to respond to comment letters on the Notice of Preparation, but Caltrans does consider those comments as the project moves forward. The project distribution list has been updated to include Ms. Meyers to ensure that in the future she receives all project related announcements. Although, Ms. Meyers did not receive a Notice of Intent letter at her residence, she did receive the necessary information from the Metro Team, which is part of the Project Development Team.

NUPCA 3: CEQA does require public notice of the intent to adopt a Negative Declaration (ND) or a Mitigated Negative Declaration (MND). To comply with CEQA and the CEQA Guidelines, the Department must provide a notice of intent to adopt a negative declaration or mitigated negative declaration to the public, responsible agencies, trustee agencies, and the county clerk of each county within which the proposed project is located, sufficiently prior to adoption by the lead agency of the negative declaration or mitigated negative declaration to allow the public and agencies the 30 day review period. The Department must mail a notice of intent to adopt a negative declaration or mitigated negative declaration to the last known name and address of all organizations and individuals who have previously requested such notice in writing and must also give notice of intent to adopt a negative declaration or mitigated negative declaration by at least one of the following procedures to allow the public the 30 day review period:

1. Publication at least one time in a newspaper of general circulation in the area affected by the proposed project. If more than one area is affected, the notice must be published in the newspaper of largest circulation from among the newspapers of general circulation in those areas.
2. Posting of notice on and off site in the area where the project is to be located.
3. Direct mailing to the owners and occupants of contiguous property shown on the latest equalized assessment roll.

As a matter of Department policy, the Notice of Intent to Adopt an ND or MND must be published in the local paper. Caltrans determined that it was not cost effective to publish the Notice of Intent in the Los Angeles Times as the commenter recommended. Caltrans has determined that we are in compliance with CEQA and with our internal policy by notifying via direct mailing of the document and the notice of intent letter, as well as publication in the Downtown News and La Opinion. Metro has also assisted by distributing an e-blast to potentially interested parties in English and Spanish.

It is considered the commenter's opinion that Downtown News does not circulate within the actual impact area. Below is a list of distribution points of Downtown News as well as a circulation map, just for informational purposes.

DISTRIBUTION

The Downtown News is distributed weekly to virtually all residential & commercial buildings.
It is also available in many newsracks, retail locations, restaurants and businesses.

CIRCULATION AREAS - Downtown Los Angeles and parts of Wilshire Center, Echo Park, Los Feliz & Silver Lake! This is a partial distribution list.

Shopping Areas and Plazas

505 Flower • AEG/LA Live • Alpine Town • Bamboo Plaza • Bank of America Plaza • Bonaventure Shopping Gallery • Bunker Hill Market & Deli • California Mart • California Plaza • Chinatown Plaza • Famima • Far East Plaza • Fashion District • FIGat7th • Flower Mart • Fox Jewelry Plaza • Grand Central Market • Historic Core • International Jewelry Plaza • Japanese Village Plaza • Jewelry District • LA Jewelry Center • LA Philharmonic Store • Los Angeles Mall • L.A. Mart • Mercado La Paloma • Little Tokyo Shopping Ctr. • Old Bank District • Olvera Street • Promenade Shops • San Antonio Winery - Gift Shop • Stanford Mart • The Bloc • Union Bank Plaza • Union Station • Wells Fargo Center - The Court • World Trade Center

The Seat of Government

Board of Education • Caltrans District Headquarters • City Hall • City Hall East • City Hall South • City of L.A. Personnel Department • County Court House • County Hall of Administration • County Health Building • Criminal Courts Building • Department of Water & Power Headquarters • Federal Building • Figueroa Plaza • Geffen Contemporary Museum • Hall of Records • Japanese American National Museum (Little Tokyo) • Junipero Serra State Building • Kenneth Hahn Hall • Law Library • LA Superior Court • L.A. Fire Department • LAPD Parker Center • Los Angeles Law Center • Los Angeles Police Administration Building • Los Angeles Times • Evans Community Adult School • Museum of Contemporary Art • Music Center • Ronald Reagan State Building • Roybal Building

Significant Downtown Buildings

411 W. Fifth St. Building • 444 Building • 550 S. Hope Building • 611 W. Sixth Building • 617 W. Seventh Building • 801 Tower • 888 Tower • 818 Building • 911 Wilshire Building • 1000 Wilshire Building • 1100 Wilshire • 2500 Wilshire Building • AEG/LA Live • AT&T Center • American Red Cross Building • Anjac Fashion Building • Aon Center • Banco Popular Center • Bank of America Plaza • Bradbury Building • Broadway Spring Center • Brunswig Square • California Endowment • California Hospital Medical Center • California Science Center • Carpenters Union Trust • Cathedral of Our Lady of the Angels • Chinatown Public Library • Chinese Chamber of Commerce • Citigroup Center • City National Bank Building • City National Plaza • Colburn School of Performing Arts • Cortines School of Visual & Performing Arts • Crown Plaza Building • Department of Mental Health Building • Department of Real Estate • Ernst & Young Plaza • Federal Reserve Bank • FIDM • Figueroa at Wilshire • Figueroa Tower • Financial Center Building • Friedman Center • Gas Company Tower • International Tower Building • Jewelry Trades Building • Ketchum Downtown • L.A. Center Studios • LA Theatre Center • L.A. Trade Tech College • LA Social Services Building • Los Angeles Athletic Club • Los Angeles Convention Center • Echo Park Public Library • Los Angeles Unified School District • Loyola Law Administration • Manulife Plaza • MCI Center • Mellon Bank Center • Metropolitan Water District • MTA Building • North American Building • One California Plaza • One Wilshire • Pacific Exchange • Pacific Financial Center • Pacific States University • Patriotic Hall • Pershing Square • Prudential Building • Richard J. Riordan Central Library • Roosevelt Building • SCI-Arc • Spring Arcade Building • Staples Center • TCW Building • The California Club • The Jonathan Club Building • Two California Plaza • U.S. Bank Tower • Union Bank of California • Union Bank Plaza • University of Southern California • Wells Fargo North Tower • Wells Fargo Center • World Trade Center

Where People Live

2121 Lofts • Angelus Plaza • Anjac Building • Ballington Plaza • Belmont Station Apts. • Biscuit Company Lofts • Bunker Hill Towers • Canvas LA • Commodore Regency Apartments • Douglas Building • DuBarry Apartments • Elleven • Emerald Terrace Apartment Homes • Evo • Figueroa Arms • Figueroa Courtyard • Figueroa Plaza • Grand Central Apartments • Grande Promenade • Hayward Apartments • Hellman Building • Higgins Building • Historic Gas Co. Lofts • Hope Village Apartments • Huntington Apartments • JSDA-Lofts & Offices • Little Tokyo Lofts • Little Tokyo Tower • Luma South • Market Lofts • Medici • Met Lofts • Metro 417 • The Metropolitan • Toy Factory Lofts • Museum Tower • One Bunker Hill • Orsini Apartments • Orpheum Lofts • Pacific Electric Lofts • Parker Apartments • Piero Apartments • Pegasus Apartments • Premiere Towers • Promenade Plaza • Promenade Towers • Renaissance Tower • Reno St. Apartments • Roosevelt Lofts • San Fernando Building • Santa Fe Lofts • Santee Court • Savoy Condominiums • Skyline Condos • Skyline Terrace • Skyline Village • Sky Lofts • Spring Tower Lofts • South Park Lofts • Spring Arts Tower • Telacu Plaza • TenTen Wilshire • Tokyo Villa • USC Trojan Residence • Van Nuys Apartments • Visconti Apts • Weingart Center • Young Apartments

Where People Eat

29th Street Cafe - The Two Nine • Alibaba Restaurant • Barragan Café • Border Grill • Cafe San Michel – LA Mall • Cafe Wilshire • California Crisp • Clifton's Cafeteria • Colori Kitchen • Denny's Restaurant • Eastside Market • El Compadre • The Escondite • The Express Café • Farmer Boys Hamburgers • The Fisherman's Outlet Seafood • Frying Fish • Galero Grille Cathedral Plaza • Green Bamboo • Gus's Drive In • LA Athletic Club - Duke's Sports Bar • La Barca Restaurant • LA Café • La Parrilla • LA Rotisserie • Loyola Law Café • Marketplace Restaurant • Masa • Numero Uno Pizza • Ocean Seafood • Oiwake • O'Mama Mia • Oomasa • Palm • Philippe's The Original • Pitfire Pizza • Plum Tree Inn • R23 • Señor Fish • Spring Street Smokehouse • Subway Restaurant • Taix Restaurant • TiGeorges' Chicken • Traxx • Urth Café • Via Café • The Village Kitchen • Water Grill • Weiland Brewery Underground • Wok Inn • Wokcano • Won Kok • Zip Fusion Sushi

For Visitors

Best Western • Cecil Hotel • Doubletree by Hilton • FIGat 7th • Holiday Inn Express • Hotel Figueroa • Huntington Hotel • Hyatt Regency Downtown • Kawada Inn • LA Live • Los Angeles Athletic Club • Luxe Hotel • Mayfair Hotel • Metro Plaza Hotel • Millennium Biltmore Hotel • Miyako Inn & Spa • Park Plaza Hotel • O Hotel • Omni Los Angeles Hotel • Quality Inn • Radisson Wilshire Plaza Hotel • Ritz Milner Hotel • Sheraton Hotel • The Southern Hotel • Stay on Main Hotel • Westin Bonaventure Hotel

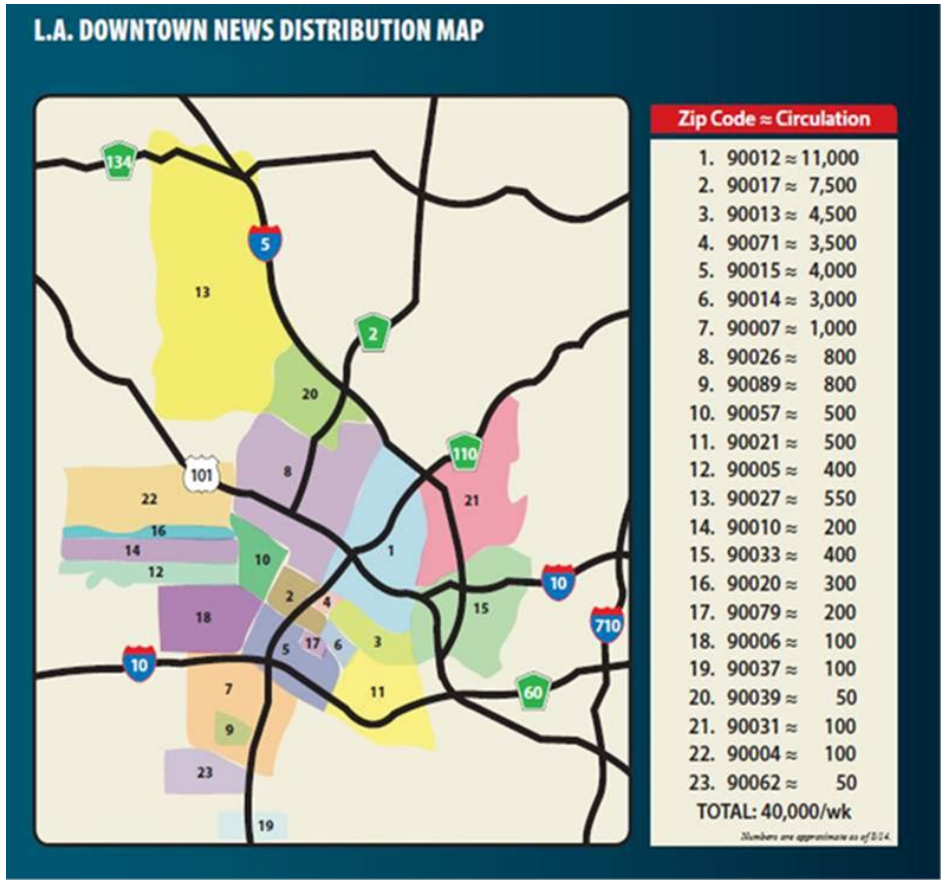
Hospitals

Barlow Hospital • California Hospital Medical Center • City of Angels Medical Center • Good Samaritan Hospital • H. Claude Hudson Health Center • LOMA Acupuncture Clinic • Orthopaedic Hospital • Pacific Alliance Medical Center • Shriners Hospitals for Children • St. Vincent Medical Center • USC Norris Cancer Hospital • USC University Hospital

W. of 110 Freeway/Wilshire Corridor

1055 Wilshire Building • 1541 Wilshire Building • 1200 Wilshire Building • 1245 Wilshire Building • 2500 Wilshire Building • 2600 Wilshire Building • 3255 Wilshire Building • 3540 Wilshire Building • ACLU • Bob Baker Marionette Theatre• Broadway Trade Center • Los Angeles Area Chamber of Commerce • Chinese Chamber of Commerce • Catholic Charities • Department of Mental Health - County Building • Dongguk Royal University • Equitable Plaza • Filipe De Neve Library • First Unitarian Church • Friedman Center • JSDA Lofts & Offices • L.A. Public Service • L.L.C. Building • Liberty Training Institute • Mark Taper Transplant Center • McArthur Park Recreation Center • Pacific Exchange • Roman Catholic Administration • Samaritan Medical Tower • Wilshire Bixel Building

- and many more -



NUPCA 4: The commenter's opinion is noted. Because the Metro ExpressLanes program is designed to 'move more people, not more cars,' Metro has implemented multiple strategies to improve and promote transit service and carpooling along the I-10 and I-110 corridors. First, Metro provides transit subsidies to the Metro Silver Line, Foothill Transit, Torrance Transit, and Gardena Transit to increase the number of transit trips traveling on the ExpressLanes. As a result, each weekday 213 transit trips carrying approximately 6,450 passengers travel on the I-110 ExpressLanes, exit at Adams Blvd., and continue on to downtown Los Angeles. Ridership gains have been particularly strong on the Metro Silver Line, which has increased 25% from 89,000 monthly trips in November 2012 to 112,000 in November 2015.

To encourage carpooling, Metro offers rewards to customers who choose to carpool on the ExpressLanes. Whenever a Metro ExpressLanes account holder carpools on the ExpressLanes, the Carpool Loyalty Program automatically enters them into a monthly drawing for a chance to win gift card rewards. Each month, 40 winners are selected from this pool of carpoolers-10 HOV2 winners for each corridor, and 10 HOV3+ winners for each corridor. 2-person carpools (HOV2) receive $20, and carpools of 3 or more people (HOV3+) receive $30 in the form of Visa gift cards, but they can also select to receive toll credits instead.

Furthermore, the Metro ExpressLanes' Low-Income Assistance Plan (formerly called the Equity Plan) provides a discount to qualifying Los Angeles County residents who sign up for a Metro ExpressLanes account. Low-Income Assistance Plan account holders receive a $25 discount when they sign up, and also have their $1 monthly maintenance fee waived.

Since the inception of ExpressLanes, Metro has seen significant increases in carpool trips. In particular, of the trips that exited the I-110 ExpressLanes at Adams Blvd. two (2) person carpools increased from 15,389 to 71,179 monthly trips and three (3) person carpools increased from 5,847 to 38,561 monthly trips. The growth in carpools is such that more than half of all trips using the Adams Blvd. off-ramp today are carpools.

In addition to transit subsidies, the Carpool Loyalty Program and Low Income Assistance Plan, Metro also grants net toll revenue, which is toll revenue remaining after operations and maintenance expenses are paid for. These grants are awarded to projects that improve mobility in the I-110 and I-10 corridors including roadway, active transportation, and transit projects. In 2014, over $20 million was granted and in 2016 Metro expects to award another $20-24 million.

Though single occupant vehicle trips using the Adams Blvd. off-ramp increased from 40,045 in November 2012 to 95,046 in November 2015, this represents less than half of the total number of monthly trips (204,786) in November 2015. It is likely that many of these trips were not discretionary and without the ExpressLanes would have been made in the general purpose lanes, increasing congestion for all travelers in the corridor. However, by providing a choice to use the ExpressLane the single occupant driver realizes significant travel time savings and the tolls generated are used to fund increased transit service, the net toll grant program, Carpool Loyalty Program and Low Income Assistance Plan, all of which would not be possible without the ExpressLanes.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated.

Caltrans Division of Traffic Investigations concurs that enhancing capacity will often induce DMT's by encouraging drivers to use the new facility. However, adding capacity also enhances Level of Service (LOS) and improve traffic flow, thus, reducing traffic delay, improving air quality, and improving accident rates. In the Traffic Study, Caltrans, considered a 20% increase in traffic for future analysis, even though, MyFig project will discourage some motorists from using the proposed ramp onto Figueroa Street. MyFig project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes (approximately 34%) by converting an existing vehicle travel lane to cyclists only, therefore, increasing travel time delay. Thus, some motorists will be discouraged to use new ramp and choose to remain traveling northbound toward downtown using freeway mainline.

NUPCA 5: Once an alternative is determined to be infeasible, the alternative is not studied in further detail. Thirteen (13) alternatives were considered (eleven (11) alternatives were considered but eliminated from further discussion for various reasons, which are explained in Section 1.6 of the environmental document). The remaining alternatives are the No Build and the Build which were studied in further detail because they were determined to be feasible by the Project Development Team. Alternative development is completed by the Design Team and does not require public input.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The commenter's suggestions do not meet the purpose and need of the project. Further, the traffic study reports prepared for this project have analyzed seven different alternatives which include the following two alternatives proposing diverting non-HOV/HOT vehicles from traveling Adams Blvd. westbound direction:

Alternative "1.2" proposed in the *VA (Value Analysis) Study Summary Report*. The **Alternative "1.2"** will not require a new HOT off-ramp direct connector. Instead, this concept will widen the existing right-side HOT lane off-ramp to Adams Blvd. to make it a two-lane exit configuration at the nose in lieu of the one-lane condition in the current configuration for the HOT off-ramp. This alternative would create left turns on the off-ramp with the No. 4 lane an either/or (right turn/left turn). In order to receive the four left-turn lanes on westbound Adams Blvd., the following revisions are required to the five-lane section as currently exists on the northbound Adams Blvd. lanes:

• 1 left-turn lane,
• 2 through lanes [with the No. 2 through lane an either/or (straight/right turn)], and
• 2 trapped off lanes to Figueroa Way

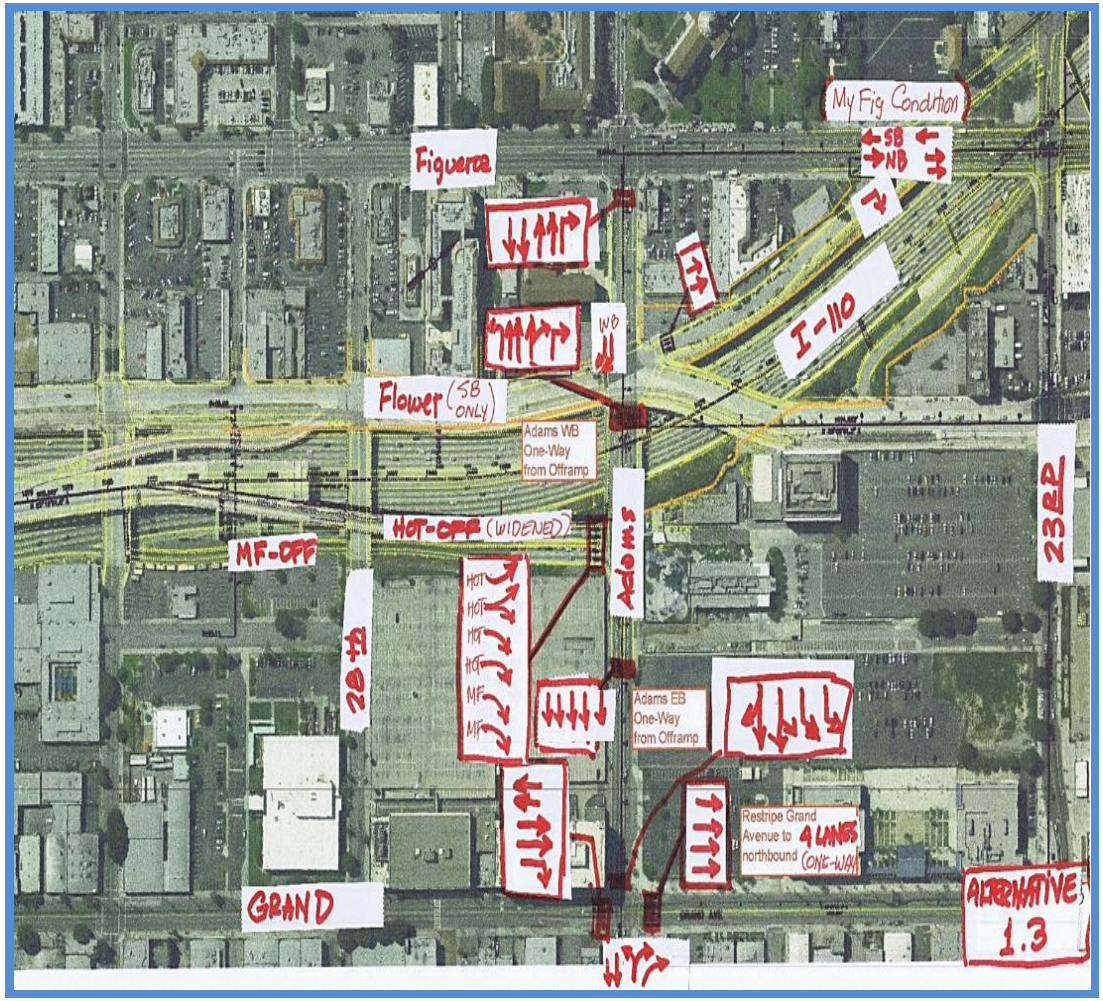
The freeway I-110 off-ramp/Adams Blvd. will be converted into a T-intersection with HOT lane traffic only turning left (westbound) and mixed-flow traffic headed either westbound or eastbound only. Eastbound Adams Blvd. will be trapped off (two lanes) to southbound Flower Street. The signal will still remain at the Adams Blvd. /Flower Street/Figueroa Way/LRT intersection. The mixed flow off-ramp will be right-turning movement only traveling eastbound onto Adams Blvd. The designated southbound Flower Street left-turn movement onto Adams Blvd., traveling eastbound will be eliminated. See exhibit below for proposed lane configurations of Alternative VA 1.2.

Proposed VA
Alternative 1.2
W 23rd St
Estrella Ave
W 20th St
S Figueroa St
Saint
James Park
110
Scarff St
Chester Pl
Figueroa Way
Harbor Fwy
Wingstop
S Flower St
Los Angeles
Trade-Tech
College
Tracy
Clinic
Mt St Mary
College
23rd Street
Station
Ortho
W 23rd St
S Hope St
W Adams Blvd
W 27th St
University Ave
S Figueroa St
Orthopaedic
Hospital
S Grand Ave
W 24th St
S Hill St
Alpha Tau
Omega Fraternity,
USC chapter
Theta Xi
Fraternity
W 28th St
W 25th St
W Adams Blvd
W 29th St
S Flower St
S Hope St
W 28th St
W 27th St
S Hill St
S Grand Ave
W 29th Pl
W 31st St
W 30th St
W 28th St
S Broadway
W 27th St
John Adams

Alternative "1.3" proposed in the VA Study Summary Report. The Alternative "1.3" will not require a new HOT off-ramp direct connector. Instead, this concept will widen the existing right-side HOT lane off-ramp to Adams Blvd. to make it a two-lane exit configuration at the nose in lieu of the one-lane condition in the current configuration for the HOT off-ramp.

The I-110 Hot off-ramp/Adams Blvd. will be converted into one exclusive left-turn lane plus one shared lane plus two exclusive right-turn lanes. The freeway I-110 mixed off-ramp/Adams Blvd. will be converted into two exclusive right-turn lanes traveling eastbound onto Adams Blvd. Eastbound Adams Blvd. will be converted into One-Way eastbound direction. The designated southbound Flower Street left-turn movement onto Adams Blvd. traveling eastbound will be eliminated. Adams Blvd. will have restricted movements between Flower Street and Grand Avenue, impacting the City's traffic circulation patterns: 600 to 700 vehicles per hour (per direction) that must re-circulate through the City network. Grand Avenue will be converted into a one-way street to regain the northbound capacity lost by the MyFig project. The Figueroa Way to Figueroa Street merge will remain as in the baseline concept. This alternative is compatible with the reduced capacity condition imposed by the MyFig project on Figueroa Street.

See below exhibit for proposed lane configurations of Alternative VA 1.3.



In summary, both alternative VA 1.2 and 1.3 will significantly impact the intersection of Flower Street and Adams Blvd. Also, the City of Los Angeles has rejected the two alternatives anticipating community rejection.

NUPCA 6: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The other historical properties that the commenter mentions are outside the boundaries of the established project area of Potential Effects as well as the Supplemental Area of Potential Effects (APE). No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

NUPCA 7: The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. Caltrans does not have the authority to address issues on local streets, and concerns over local streets should be communicated to the City of Los Angeles.

NUPCA 8: An analysis of fault rupture hazard for a particular fault requires that the fault be located exactly, and its potential for rupture to be known, if only approximately. There are no known earthquake faults crossing the project. The closest earthquake fault zone under the auspices of the Alquist-Priolo Earthquake Fault Zoning Act is the Newport-Inglewood Fault Zone, which is located 4.5 miles SW of the project.

Liquefaction may take place if near-surface subsurface materials are loose to medium dense granular and non-plastic soils, submerged in shallow groundwater, and are shaken by an earthquake with sufficient energy. All of these characteristics must be present for liquefaction to potentially occur. Additionally, there is well established guidance for evaluating a site's potential for liquefaction, which has been applied to this project.

The subsurface information obtained for the design of existing bridges near the job site and the recent subsurface exploration performed for the proposed bridge, indicate the subsurface soils at the site are dense to very dense. The liquefaction potential of the site was evaluated using subsurface information and the established technical procedure. The result of the evaluation indicates the site has a low probability of liquefaction.

NUPCA 9: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Further, the following areas were evaluated in the environmental document:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)
- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography
- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Andrea Canty, President
Josyel Castellon, Vice President
Julie Burg, Treasurer
Eddie North-Hager, Secretary

EMPOWERMENT CONGRESS
NORTH AREA
NEIGHBORHOOD
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Vacant, Business

a(2)
Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

Re: Interstate I-110 HOT Flyover to Figueroa Way
Draft MND and IS/EA
EA: 07-27800/EFIS# 0700000537

Dear Mr. Damrath,

NANDC 1

At a meeting of the North Area Neighborhood Development Council (NANDC) general board held on Thursday, March 3, 2016, the board adopted, by a vote of 8 yes 0 no 0 abstention, the following resolution against the 110 flyover project:

"Because of its impacts to historic structures, the visual blight it introduces, how it runs counter to current City policy of promoting pedestrian and bike-friendly streets, and because it would disrupt the services and environment of the churches in the area, we support the "no-build" alternative in the 110 flyover project and support a full Environmental Impact Report above and beyond the Mitigated Negative Declaration finding."

NANDC 2

Thank you for considering our objections to this project in your decision-making process.

Sincerely,

North Area Neighborhood Development Council (NANDC) Board

Andrea Canty, President

Brett Shears, Chair, Policy Committee

NANDC 1: Commenter's opposition to the project is noted. The remainder of the comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

NANDC 2: The commenter's opinion is noted. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and the SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

One of the mitigation measures in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

MIKESELL HISTORICAL CONSULTING

SECTION 106 AND HISTORIC BRIDGES

March 16, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 South Main Street, MS16A
Los Angeles, CA 90012

Dear Mr. Damrath:

Re: IS/EA, MND for I-110 HOV Lanes Flyover Project

I was asked by the West Adams Heritage Association to provide an expert analysis of the Draft Initial Study/Environmental Analysis (IS/EA) and Mitigated Negative Declaration (MND) for the subject project. I have some 30 years of experience in applying state and federal cultural resource laws to transportation projects, including 10 years as the Deputy State Historic Preservation Officer.

In my view, it is far more appropriate that this project be treated in an EIR/EIS rather than EA/MND, and that the re-analysis include a much more robust discussion of Section 4(f). The following comments presume that the remarks of the State Historic Preservation Officer (SHPO) regarding adverse effects will stand and that the Preferred Alternative will result in an Adverse Effect to St. John's Cathedral and to the St. John's Parish House and will result in No Adverse Effect to St. Vincent de Paul Church, the Automobile Club of Southern California, and the Stimson House. Mikesell 1

I make this conclusion based upon the following three points.

1. Alternatives were not considered

The most effective means of avoiding an adverse effect (substantial adverse change) is to explore alternatives that would avoid the adverse effect or result in a less damaging adverse effect.

The existing document explores no alternative other than the "no build." Under CEQA, 36 CFR 800, and Section 4(f), the exploration of avoidance alternatives is mandatory. Pages 23 to 27 of the MND list 10 alternatives, at least six of which appear to have the potential to avoid the adverse effect to the church and parish house. The brief discussion given to these rejected alternatives does not offer sufficient information to allow a reasonable person to conclude that the alternative is or is not feasible. It does appear, however, that alternatives 6-11 have the potential to avoid the adverse effects to these two Mikesell 2

historic properties as well as the less-than-adverse effects to the other historic properties in the area. It seems reasonable that the analysis of some if not all of these Avoidance Alternatives should be analyzed to the same level as the Preferred Alternative. Mikesell 2

2. The mitigation measures do not mitigate the impact to a level that is not significant

CEQA guidelines and best practices indicate that a mitigation measure must address the nature of the impact, if it is to mitigate that impact to a level that is less than significant. The substantial adverse change/adverse effect from this project to the two St. John's properties is related to the fact that it will "introduce visual elements that would be out of character and thus result in adverse effects." (p. 129) The proposed mitigation measures, while useful, do nothing to address the nature of the adverse effect.

- An interpretive program that summarizes the history of West Adams addresses local historical interpretation but not the visual elements of the flyover.
- A mobile exhibit on St. John's Cathedral would be useful for cultivating local pride but not in mitigating the visual elements of the flyover,
- Developing a historically sensitive streetscape on Figueroa Street would address the design of Figueroa but not the visual elements of the flyover.
- An HSR/Preservation Plan for St. John's Church might address vibration impacts from construction but not the visual impacts from the flyover.
- Archaeological avoidance would address potential impacts to buried sites but not the impact of the overhead structure.

Mikesell 3

The proposed mitigation measures, in short, have no relationship to the visual intrusion that would be introduced to the immediate setting for the two St. John's buildings. These measures do not support a conclusion that "the impact on the two historical properties will be less than significant." (p. 129)

3. Section 4(f) "constructive use" criteria may actually be met in this case

The ND/MND (IS/EA) does not address 4(f) in any detail except to note that "No Section 4(f) resources will be impacted or used for the proposed project." (p. 129) In Appendix B, the document notes: "Specifically a visual intrusion (under Section 106 Compliance), but a Memorandum of Agreement (MOA) will be prepared in consultation with the State Historic Preservation Officer and after the avoidance, minimization, and/or mitigation measures are implemented the visual intrusion will be less than significant. In other words, the proximity impacts do not result in constructive use. Therefore, the provisions of Section 4(f) are not triggered." Mikesell 4

A more detailed discussion of 4(f) was included in a Fact Sheet/Frequently Asked Questions handout for a recent public hearing. That handout correctly notes that the project will not permanently use the St. John's Church and Parish. It also is correct in noting that 4(f) would apply only through a finding of "constructive use." It correctly observes that a constructive use finding must be based upon "substantial impairment" and that "the finding of constructive use is almost never used."

To say that constructive use is "almost never used," however, is not to say that it is *never* used or that it *cannot be* used. Both FHWA and Caltrans provide guidance for making a finding of constructive use: See

FHWA "4(f) Policy Paper," 2012, and Chapter 20 of the Caltrans Standard Environmental Reference (SER). The SER includes a useful "decision tree" for determining whether "constructive use" will occur on any given project.

Mikesell 4

My point is not that there necessarily will be a constructive use arising from the introduction of the I-110 Flyway beside the two St. John's resources. Rather, the point is that both the federal and state guidelines acknowledge that a constructive use may occur due to proximity impacts and that the visual intrusion posed by the flyway is precisely the type of impact that needs to be formally evaluated, using the guidance provided in the FHWA Policy Paper and Chapter 20 of the SER.

AN EIR/EIS would provide an opportunity for Caltrans to explore in greater detail the three points I mention here: to explore more alternatives that might avoid the adverse effect; to explore mitigation measures that address directly the adverse effect; and to more thoroughly consider the possibility of a constructive use.

Mikesell 5

Thank you for considering these observations.

Sincerely,

Stephen D. Mikesell
Mikesell Historical Consulting Services
Davis, CA

Mikesell 1: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

With respect to Section 4(f) protection, it is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Mikesell 2: The commenter's opinion is noted. Section 4(f) protection, it is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Thirteen (13) alternatives were considered (eleven (11) alternatives were considered but eliminated from further discussion for various reasons, which are explained in Section 1.6 of the environmental document). The remaining alternatives are the No Build and the Build which were studied in further detail because they were determined to be feasible by the Project Development Team. Once an alternative is determined to be infeasible, the alternative is not studied in further detail.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Mikesell 3: The commenter's opinion is noted. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Mikesell 4: The commenter's opinion is noted. With respect to Section 4(f) protection, it is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Mikesell 5: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

GILBERT A. CEDILLO
COUNCILMEMBER
FIRST DISTRICT

February 23, 2016

Mr. Ronald Kosinski
Deputy District Director
California Department of Transportation
100 South Main Street
Los Angeles, CA. 90012

Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration (MND)/ Environmental Assessment (IS/EA) Los Angeles County, California District 7-LA-110 PM 20.10/20.92
EA: 07-27800/EFIS #: 0700000537
SCH No. 2013021002

Dear Mr. Kosinski:

Thank you for the opportunity to provide comments on the proposed environmental document in connection with the "I-110 High-Occupancy Toll Lanes Flyover Project". My office is concerned that the proposed Mitigated Negative Declaration is inadequate and suggests that a Draft Environmental Impact Statement / Environmental Impact Report should be prepared as a result of the failure to provide an adequate analyses of environmental impacts.

The Initial Study determines which impacts shall be analyzed and the level of environmental review. My office disagrees with the initial determinations in the following impacts areas: Cedillo 1

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Transportation / Traffic

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- Environmental Justice

I would like to offer the following general comments and may submit additional detailed comments prior to the March 21, 2016, deadline.

Aesthetics: My office disagrees with the determination that the project shall have no impact on aesthetics. We believe that the project will degrade the aesthetic character and quality of surrounding properties, given the project's adjacency to several City designated Historic-Cultural Monuments located on Figueroa Street and Adams Boulevard, the historic Mount Saint Mary's University and the University Park Historic Preservation Overlay Zone. Cedillo 2

Air Quality: My office disagrees with the determination of no impact under B, C, D and E, especially in light of fact that the two immediately adjacent Census Tracts are in the top five and ten percent of SB 535's Socioeconomic Disadvantaged Neighborhoods which are highly pollutant-burdened communities. Cedillo 3

Greenhouse Gas Emissions: The verbiage is unclear and speculative. What type of analyses was conducted with respect to potential impacts on climate change? One cannot speculate on what analyses may or may not have been conducted. Without the benefit of such information, there is a failure to adequately inform the public and decision-maker relative to the potential impact on Greenhouse Gas Emissions. Cedillo 4

Hazards and Hazardous Materials: My office disagrees with the determination that impacts on hazards and hazardous materials are "less than significant" as it applies under C. It should be noted that within ¼ mile of project location are multiple sensitive users, including parks (Saint James Park), schools (such as FD Lanterman High School, a special needs school, Saint Vincent Elementary School, New Designs Charter School, and Mt. Saint Mary's College) and a public elementary school (Norwood Elementary School) located slightly beyond ¼ mile. Cedillo 5

Land Use and Planning: Missing is an adequate analyses of potential impacts on various land use plans governing adjacent communities, including the Mobility Plan recently adopted by the Los Angeles City Council and which supersedes the 2010 Bike Plan, the Historic Preservation Overlay Zone ("HPOZ") and an existing Oil Drilling ("O") District. Cedillo 6

Noise: My office disagrees with the initial determination of No Impact under A-F. There is a failure to analyze potential noise impacts on the immediately adjacent low-income residential neighborhood which is characterized by wood frame houses which do not have the benefit of noise insulation and sound proof measures. Cedillo 7

Transportation / Traffic: There is no analysis of the project's impact on neighborhood intrusion or reference to collision data impacting pedestrians and bicyclists available through the California Highway Patrol, including data on injuries and fatalities at surrounding streets. In addition, the recently adopted Mobility Plan extends beyond Figueroa Street, including the redesignation of street classifications. An analyses of the Cedillo 8

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recently adopted Mobility Plan ought to be conducted in order to fully and adequately determine impacts. Cedillo 8

Environmental Justice: The document does not include an analyses of the project's impact on Environmental Justice. The document makes reference to outdated regional population and housing data (such as, the Department of City Planning utilizing 2009 population estimates) for South and Southeast Los Angeles, as opposed to utilizing more current data such as the U.S. Census American Community Survey, which would provide data specifically relating to the impacted census tracts and blocks. SB 535 identifies Disadvantaged Communities and offers the Cal Enviroscreen data tool in order to define socioeconomic disadvantaged communities which are pollution-burdened. The adjacent two Census Tracts are characterized with 83% and 84% Latino populations, respectively. Were public documents, for example, translated into the Spanish language in order to make the environmental document and decision-making process accessible to the impacted communities? Cedillo 9

These are a few of the inadequacies that we have found within the proposed Mitigated Negative Declaration and that we contend present a fair argument in favor of the preparation of a Draft Environmental Impact Statement/Environmental Impact Report as required under NEPA and CEQA. Cedillo 10

Sincerely,

Gil Cedillo

Gilbert Cedillo
Councilmember, First District

FC

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Cedillo 1: The commenter's disagreement with findings in the following areas is noted.

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Transportation/Traffic
- Environmental Justice

Cedillo 2: Commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Cedillo 3: The commenter's disagreement with the air quality determination is noted. The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Climate change is a global issue and cannot be attributed to a single point source/location of Green House Gas (GHG) emissions. The goals for emissions reduction set forth by AB 32 have been set for the State of California and will be achieved at the State level and regional levels with a comprehensive approach, including methods of reducing emissions from all sources.

CEQA requires a lead agency to make a good faith effort to identify impacts and gives the lead agency discretion on the approach used to analyze impacts. Caltrans has used the best available modeling data (CT EMFAC) to analyze greenhouse gas emissions related to the project and have disclosed a projected increase in CO2 emissions. While there is no scientific data available to link a single proposed project to the global greenhouse gas effects on a cumulative scale to climate change, Caltrans is committed to reducing GHG emissions as outlined in the environmental document.

As provided in the Air Quality Analysis (dated September 2015) in support of the environmental document, greenhouse gas emissions impacts in terms of carbon dioxides (CO2) have been estimated and evaluated for the project during construction as well as during operation in years 2023 and 2040. Please refer to Table 5 (below) of the Air Quality Analysis (September, 2015) for estimate of CO2 emissions during construction and Tables 15 through 17 for operational CO2 emissions in future years.

Table 5: Summary of Construction Emissions in lbs/day

	ROG	CO	NOx	PM10	PM2.5	CO2
Grubbing/Clearing	1.4	11.9	13.5	0.6	0.5	2,324.2
Grading/Excavation	10.6	80.4	109.2	4.8	4.4	17,057.3
Drainage/Utilities/Sub-grade	6.4	52.9	60.5	2.8	2.5	11,092.8
Paving	1.1	12.1	9.2	0.5	0.4	2,311.3
Maximum (lbs/day)	10.6	80.4	109.2	4.8	4.4	17,057.3
Total (tons)	3.2	25.4	32.0	1.4	1.3	5,337.6

Note: Calculation based on construction activities estimated by the project engineer.

Table 15: Comparison of GHG Emissions in 2014 (Existing) and 2023 (Opening) in tons/day

TAC	2014	2023			
	Exist. Ramp	No-Build	Build		
		Exist. Ramp	Exist. Ramp	New Ramp	Total
CO_2	0.856	1.031	0.197	1.078	1.275
CO_2 (Pavley)	0.784	0.73	0.14	0.762	0.902

Table 16: Comparison of GHG Emissions in 2014 (Existing) and 2040 (Horizon) in tons/day

TAC	2014	2040			
	Exist. Ramp	No-Build	Build		
		Exist. Ramp	Exist. Ramp	New Ramp	Total
CO_2	0.856	1.12	0.215	1.171	1.386
CO_2 (Pavley)	0.784	0.731	0.14	0.767	0.907

Table 17: Percent Changes in GHG Emissions in the Off-Ramps

TAC	2014	Opening Year 2023 (g/day)				Horizon Year 2040 (g/day)			
	Existing (g/day)	No-Build	Build	%Δ from Existing	%Δ from No-Build	No-Build	Build	%Δ from Existing	%Δ from No-Build
CO_2	0.856	1.031	1.275	49%	24%	1.12	1.386	62%	24%
CO_2 (Pavley)	0.784	0.73	0.902	15%	24%	0.731	0.907	16%	24%

Cedillo 4: Climate change is a global issue and cannot be attributed to a single point source/location of GHG emissions. The goals for emissions reduction set forth by AB 32 have been set for the State of California and will be achieved at the State level and regional levels with a comprehensive approach, including methods of reducing emissions from all sources.

CEQA requires a lead agency to make a good faith effort to identify impacts and gives the lead agency discretion on the approach used to analyze impacts. Caltrans has used the best available modeling data (CT EMFAC) to analyze greenhouse gas emissions related to the project and have disclosed a projected increase in CO2 emissions. While there is no scientific data available to link a single proposed project to the global greenhouse gas effects on a cumulative scale to climate change, Caltrans is committed to reducing GHG emissions as outlined in the environmental document.

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CO_2	0.856	1.031	1.275	49%	24%	1.12	1.386	62%	24%
CO_2 (Pavley)	0.784	0.73	0.902	15%	24%	0.731	0.907	16%	24%

Cedillo 5: The commenter's disagreement with the hazards and hazardous materials determination is noted. Caltrans has determined with the incorporation of the avoidance, minimization and/or mitigation measures discussed in section 2.2.3 of the environmental document potential impacts will be minimized.

Cedillo 6: Land use plans and findings were discussed in Section 2.1.1 of the environmental document. No change in land use is anticipated as a result of this project. With respect to the newly adopted mobility plan, which was adopted on January 20, 2016, was after the Draft IS/EA (January 11, 2016) was approved. This adopted mobility plan does not change the findings, but it is noted. The Historic Preservation Overlay Zone (HPOZ) is outside of the project study area, but will be considered in the design phase of the project. Lastly, existing oil drilling is outside of the project study area, therefore, is not discussed in the environmental document.

Cedillo 7: The noise impact study prepared for the project is in accordance with Caltrans Traffic Noise Analysis Protocol (TNAP-May 2011) which stemmed from Title 23 of Code of Federal Regulation Part 772 (23CFR772). Noise impacts have been identified and considered for abatement in accordance with TNAP. Based on TNAP, in determining traffic noise impacts, primary consideration is given to exterior areas of qualifying land uses where frequent human use occurs that would benefit from lowered noise levels. Interior of residential homes are not currently listed as qualifying land uses for consideration of noise impacts/abatement. Also, all residential zones/homes are given same consideration and TNAP does not differentiate low-income houses from others.

Cedillo 8: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. Caltrans does not have the authority to address issues on local streets, and concerns over local streets should be communicated to the City of Los Angeles. Further, concerns over accidents impacting pedestrians and bicyclists on local streets should be communicated to the City of Los Angeles to address any deficiencies.

With respect to the newly adopted mobility plan, which was adopted on January 20, 2016, was after the Draft IS/EA (January 11, 2016) was approved. This adopted mobility plan does not change the findings, but it is noted.

Cedillo 9: The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Attachment of SB535's census track data has been received, and considered. This data does not change the findings of the community impact assessment nor the environmental justice findings.

Notices and public hearing handouts related to the project were provided to the community in both English and Spanish. Further, a Spanish speaking translator was available at the public hearing. Caltrans is not required to translate the environmental document into Spanish nor is this a common practice.

Cedillo 10: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

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City of Los Angeles Planning Department
Mr. Garrettt Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High Occupancy Toll Lane Flyover Project
100 S. Main Street, MS 16A
Los Angeles, CA 90012

March 14, 2016

Dear Mr. Garrettt Damrath,

Thank you for the opportunity to provide public comments on the proposed I-110 High Occupancy Toll Lane Flyover Project. As a local homeowner/resident and as the director of an area cultural institution, I disagree with the proposed Mitigated Negative Declaration for project review. Alternately, a full Environmental Impact Report is absolutely necessary to complete before considering whether to move forward on this project. Veles 1

I ***disagree*** with the proposed initial determination that suggests the new project would not have a significant impact on the following categories: COMMUNITY CHARACTER AND COHESION VISUAL/AESTHETICS IMPACTS, CULTURAL RESOURCES, and NOISE AND VIBRATION. These categories must be put to further review in a full Environmental Impact Report. Veles 2

In addition, I strongly endorse the No. 1- No Build Alternative. Any potential gains from the I-110 HOT lane ***DO NOT*** outweigh the negatives and the presence of this proposed ramp will have a highly detrimental impact on the character of our neighborhood, adversely affecting the residents' experience of our area and the experiences of our local business' clientele - there are many restaurants on Figueroa Blvd in this area. For this reason the proposed I-110 Flyover project will greatly diminish the attractiveness of the neighborhood and significantly lower the area's property values for businesses and residents alike. Veles 3

As a resident, I regularly walk around the area centered on the intersection of Figueroa and Adams, where the I-110 ramp is proposed. There is already a sense of disconnect between the east and west of the 110 freeway. The newly opened 23rd/Flower station of the Expo line is helping encourage more activity between these two zones of the area as, compared to 10 years ago, I have notice many more pedestrians on Adams Boulevard east of Figueroa, starting to bridge this gap of community activity. Adding the HOT lane will obliterate the progress made in unifying these two areas of the neighborhood. Veles 4

Our area was recently awarded the "2015 Los Angeles Neighborhood of the Year" by Curbed LA, a Los Angeles architecture and cultural blog which maintains international readership. http://la.curbed.com/2016/1/4/10850296/los-angeles-west-adams-neighborhood-of-the-year-curbed-cup Adding the proposed I-110 flyover project to the neighborhood will greatly deter from the qualities of our area which helped us win this prestigious city-wide award. Veles 5

The currently proposed plan for the HOT lane would be catastrophic to a significant cultural and architectural resource in Los Angeles – St. John's Cathedral. Serving as a neighborhood resource for both its local congregation and residents at-large, St. John's has been a cornerstone of the community since it was founded in 1890 and serves as the Episcopal Diocese of Los Angeles. Their structure was listed on the National Register of Historic Places in 2000 and has been a Los Angeles Historic-Cultural Monuments since 1991. Veles 6

I have visited St. Johns for a variety of public programs including low-cost concerts which drew a diverse audience combined of local people and folks from across the city. I cannot imagine having the noisy and visually oppressive presence of the HOT flyover lane so close to this historic city resource. Active cultural entities and architecturally significant buildings like St. John's Cathedral inspire a sense of place amongst our local residents. Surrounding these in concrete ramps severely diminish their value for both Los Angeles residents and out-of-town visitors. Veles 7

As witnessed at the recent public hearing on February 23, 2016, the local community is extremely opposed to this project. As such, when our city funds are spread incredibly thin, it does not make sense to proceed with this very expensive project that people do not even want. Veles 8

I strongly encourage the no-build alternative for the proposed I-110 flyover. Any further exploration of the proposed project ***must*** be paired with a full Environmental Impact Report.

Thank you for your consideration.

Sara Velas, Director
Velaslavasay Panorama
sara@panoramaonview.org
(213) 746-2166

Veles 1: The commenter's opinion/disagreement is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Veles 2: The commenter's opinion/disagreement is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Veles 3: The commenter's opinion and support for the No Build Alternative is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period.

Further, there are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

The remainder of the comment is considered the opinion of the commenter and does not require a response.

Veles 4: The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

Further, there are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project. Therefore, there are no disproportionate adverse effects on any low-income and/or minority populations as per EO 12898 regarding environmental justice.

Veles 5: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the Draft IS/EA.

Veles 6: The commenter's opinion is noted. No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Veles 7: The commenter's opinions and experiences are noted. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 for more details.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Veles 8: The commenter's support for the No Build Alternative is noted. This study is being funded by a Federal grant that is administered by Metro. However, there is no funding identified for construction of this project. The current estimated cost for construction is $43 million.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
The Venerable Dr. Joanne Leslie, Archdeacon

Organization / Organización:
Episcopal Diocese of Los Angeles

Email or Mailing Address / Correo Electrónico o Dirección Postal:
jleslie@ladiocese.org

In addition to concerns about the possible physical damage to St. John's Cathedral during the construction of the flyover and the virtually certain noise pollution of the sanctuary during worship services and at other times, I would like to raise another concern. As you know Los Angeles has a major problem with homeless citizens. Their lives on the street are a burden to them and to the businesses affected by homeless encampments. I cannot believe that spending 43 million dollars to marginally improve downtown traffic flow is a higher or better use of public funds than building affordable housing and providing support services for those being housed. I recognize

Leslie 1

Metro

Caltrans

that Caltrans funds are different from housing funds but I challenge you to seriously consider this trade off. Please find a way to spend the proposed 43 million expenditure on more crucial public needs such as affordable housing. Thank you.

Leslie 1

Please submit any written comments, no later than Monday, March 21, 2016, to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Leslie 1: No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 for more details.

According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

Addressing homeless encampments and providing support services for individuals in need is outside of Caltrans' authority. This study is being funded by a Federal grant that is administered by Metro. However, there is no funding identified for construction of this project. The current estimated cost for construction is $43 million.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Kelly Coyne

Organization / Organización:
Stakeholder

Email or Mailing Address / Correo Electrónico o Dirección Postal:
mizcoyne@gmail.com

The factors which make a city great do not rest in something as simple as traffic mitagation. The great cities of the world have terrible traffic, but thats balanced - more than balanced - by great architecture and great neighborhoods. Los Angeles will not be a world class city until we start prioritizing culture and spirit over the car. This project will destroy this neighborhood. This project, if built, will prove that all the bad things people say about L.A. are, sadly, true. Coyne 1

Coyne 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Beatrice Sanford

Organization / Organización:
St. John's Episcopal – member of congregation

Email or Mailing Address / Correo Electrónico o Dirección Postal:
bea.sanford@gmail.com

The proposed flyover would significantly impact our community of faith, especially during worship services. The traffic from the freeway and from Figueroa and Adams already disturbs worship service with constant, low-level noise. With the addition of the flyover bringing frequent traffic even closer to the church, the services will be far less peaceful, far more interrupted, and for those who have hearing disabilities they may be almost inaudible. The church should provide a space of meditation, quiet, and communal worship — not a front-row seat to the noise and stress of the freeway! As a regular attendee and member of St. John's Cathedral, I ask the city to reconsider and to not build the flyover. Sanford 1

Additionally, as an Angelino who commutes by bicycle Sanford 2

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(including to church each week), it would be a dream to have Figueroa Way turned into a pedestrian and bicycle corridor. I also commute to USC, where I work, and this section of Los Angeles is very stressful to bike in — especially because it involves biking next to cars that have just exited the freeways and that attempt to keep up a freeway-appropriate speed on the non-freeway roads! Having a bicycle corridor would hugely improve this situation. I realize that this may be off the table if there is no build of the flyover (i.e. with Alternative 1), I wanted to add my voice as a pedestrian and bicyclist to note this making more bicycle-friendly routes in this area would markedly improve my life as a commuter. Sanford 2

Please submit any written comments, no later than Monday, March 21, 2016, to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Sanford 1: The commenter's opinion is noted. No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
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An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 for more details.

Sanford 2: The commenter's support for re-designing Figueroa Way into a pedestrian and bicycle corridor is noted.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Jeffrey Russell

Organization / Organización:
St John's Cathedral / USC

Email or Mailing Address / Correo Electrónico o Dirección Postal:
jeff.russell@usc.edu

As a parishioner of St John's, I am very concerned by the proposed flyover. ~~This with~~ St. John's offers some peace, sanctuary, and escape from the noise and chaos of LA, and I fear that the flyover project seriously threatens this, for at least the rest of my lifetime. Russell 1

I also want to note a positive part of the proposal. As an Angeleno who frequently walks & cycles, I very much appreciate the city's efforts to improve LA's safety & convenience for people walking and cycling. A road diet for Figueroa seems to me like a great idea, completely independently of freeway infrastructure. People driving onto and Russell 2

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Caltrans

off of freeways are a very serious risk to others' safety, and Figueroa is very problematic this way — I am often cut off by impatient people in cars. I hope that the positive proposal to slow traffic and provide protected cycling lanes on Figueroa (particularly between Pico and Exposition) won't be forgotten. This is a good idea, and it will still be a good idea without the Flyover. Russell 2

Please submit any written comments, no later than Monday, March 21, 2016, to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Russell 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Russell 2: The commenter's support for re-designing Figueroa Way into a pedestrian and bicycle corridor refer to Figure 21 of the environmental document is noted. Caltrans is the agency proposing the re-design of Figueroa Way as a mitigation measure for the proposed Build Alternative not the City of Los Angeles.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles should be contacted for safety concerns on local streets. Caltrans does not have the authority to address safety concerns on local streets, but can work with the City if necessary.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:

NATE VILLAUME@GMAIL.COM

Organization / Organización:

RESIDENT

Email or Mailing Address / Correo Electrónico o Dirección Postal:

ASSUMPTION / PREMISE OF THE PROJECT IS THAT (1) 55% OF HOT TRAFFIC EXITS AT THIS EXIT; AND (2) THAT HIGH LEVEL OF ACCIDENTS HERE. THIS IS TRUE AND MISLEADING: THE HOT LANES TERMINATE HERE AND A DRIVER HAS 1 OF 2 CHOICES – STAY ON OR GET OFF THE 110. THIS PROJECT MERELY SHIFTS THE PROBLEM A FEW BLOCKS NORTH. I THINK WE COULD SPEND $43 MILLION ON EXTENDING THE CARPOOL LANES THROUGH DOWNTOWN AND ACTUALLY SOLVING THROUGHPUT ISSUES.

1400 ft / 60 mph = ~~1400 ft 5280 ft~~ = 15.9 SECONDS

ASSUMING 60 mph FOR ~~60 mph~~ ENTIRE ~~LENGTH~~. SO ACTUAL VALUE ~~[illegible]~~ WOULD BE HIGHER. @ 30 mph TIME SAVED IS 32 ~~mph~~ sec.

Villaume 1

Metro

Caltrans

I'M NOT A SUPPORTER OF THIS PROJECT.

Villaume 2

Please submit any written comments, no later than Monday, March 21, 2016, to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Villaume 1: The commenter's opinion is noted and the commenter's support for the No Build Alternative is noted. The proposed project will not redistribute the traffic to 23rd Street and adjacent streets, therefore, no additional traffic will be diverted to 23rd Street. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Isaac Stephenraj

Organization / Organización:
St. John's Cathedral

Email or Mailing Address / Correo Electrónico o Dirección Postal:
isaac.stephenraj@gmail.com

Stepheniaj 1

The project has a multifaceted consequences. The project cannot be evaluated only on the basis of assumed traffic benefits.
The decision should take into account the cultural, spiritual & environmental effects of this project.
The assumed traffic benefit cannot be evaluated in vacuum.

Stepheniaj 1: Traffic is not the only factor that is considered in the evaluation of potential impacts as a result of the proposed alternative. The topics that have been evaluated in the Draft IS/EA are:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)
- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography
- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Mr. Yosef Azri'el
1344 West 29th St.
Los Angeles, CA 90007

2/23/16

Re: Opposed to the I-110 Flyover and the MND

Dear Caltrans:

As the lead agency, the proposed I-110 Freeway Flyover is ill-conceived and causes more harm than good. Azri'el 1

Benefits

Caltrans' has ascertained the merits for building the I-110 Freeway Flyover (110FF) is to increase traffic flow. This appears to be a sound argument, however, the post freeway traffic flow analysis states at best; traffic flow would increase by 2 minutes and cost an estimated forty million dollars ($40,000,000). Increasing the traffic flow by 2 minutes does not justify spending $40,000,000 and disrupting the immediate neighborhood and community. **Caltrans' reasoning and insistence to go forward with the project is ill-advised.** Azri'el 2

More Harm than Good

Caltrans is to interpret the above and following comments under the guise, *Pocket Protectors v. City of Sacramento (2004) 124 Cal.App.4th 903, 928 [21 Cal.Rptr.3d 791]. "Relevant personal observations of area residents on nontechnical subjects may qualify as substantial evidence ...."*

In the MND, it is erroneous to assume, premised on Caltrans' inadequate traffic street analysis, that the the 110FF freeway exit circulation patterns at 23rd and Figueroa St. is projected to be **minimal.** On the contrary, we already have traffic congestion at the intersection of 23rd and Figueroa St. Azri'el 3

Currently, the traffic congestion on Figueroa St., referred to as the "Figueroa Corridor," effects vehicle traffic flow on the boulevard, and into the surrounding feeder streets, 23rd St. in both directions. As a result of the 110FF, the increase traffic flow down 23rd St. presents greater vehicle safety issues for our neighborhood children, New Designs Charter School, 10th Street Elementary School, Laternman High School for the disabled, and Mount St. Mary's University.

The MND omits and fails to recognize how the 110FF proposed exit off-ramp at 23rd St. will further shift traffic patterns down 23rd St. As a result; the MND overlooks to include any substantial traffic flow data at 23rd and Union St. and at 23rd and Hoover St. Azri'el 4

Memorial Coliseum and Nearly Completed USC Village

The MND ignores to calculate the future traffic flow patterns once the Los Angeles Rams begins playing at the Memorial Coliseum, nor does the MND discuss the traffic flow patterns that include the nearly completed five hundred million dollar USC Village Project. The USC Village Project is slated to be completed in the Fall of 2017. The USC Village Project includes living accommodations for 2,500 students. Azri'el 5

Faulty Findings Requiring Additional Study

I am in total disagreement with MND traffic data findings, and the declaration that there will be no negative traffic impact upon the community, therefore, an EIR should be conducted under Guidelines, § 15064, subd. (b) and (G), "the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved...." (Guidelines, § 15064, subd. (b).) "[I]n marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR." (*Id.*, subd. (g).) Azri'el 6

"... substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR." (*Id.*, subd. (g).)

More Harm than Good

It is without argument and very obvious, the 110FF project will visually impact our historic landmarks and substantially impact the historic aesthetics. The MND notes, " **Potential to indirectly affect two historic properties (St. John's Cathedral Church and Parish House). These effects are adverse because the impacts will indirectly alter the integrity of the historic property's setting."**

The argument for such is found in the Caltrans' MND, "The presence of the flyover has the potential to obscure historically significant views towards and from St. John's Episcopal Church. The proposed structure would visually impair the views of the church's main entrance/front steps to the southeast by the addition of ramp and columns to the east of the church. Azri'el 7

The proposed Build Alternative may visually impair the view from the front (north) steps of St. John's Episcopal Church looking northeast across West Adams Blvd. The north end of the off-ramp at South Figueroa Street and Figueroa Way would not be visible from St. John's Episcopal Church. The proposed Build Alternative may visually impair St. John's Parish Hall as well, because it is historically linked to St. John's Church.

Based on this evaluation, the proposed Build Alternative would have an adverse effect on historically significant views to and from St. John's Episcopal Church and St. John's Parish Hall as a result of the introduction of new visual elements; thereby further diminishing both historic properties integrity of setting from their periods of significance.

Caltrans finds that the undertaking may result in adverse effects on two of the five historic properties:
□□St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
□□St. John's Parish House, 515-517 West 27th St., Los Angeles."

Adding insult to injury, the recommended remedies found in the MND regarding our historic churches is grossly inadequate and does not justify building the 110FF project merely to increase freeway traffic flow by 2 minutes. Caltrans MND states, "Cultural resources mitigations, which would create a historical preservation plan/exhibits, and design a historically sensitive streetscape on Figueroa Way." Azri'el 7

In conclusion, the 110FF project will substantially and adversely affect the historic aesthetics by overpowering the historic contribution of St. John's Cathedral and St. Vincent de Paul Church.

Under the Fair Argument doctrine, proceeding forward would significantly impact the neighborhood aesthetics. Given the MND findings and personal community involvement preserving the integrity of the West Adams historic resources, the project should not go forward. **It is wrong to destroy the historic aesthetics of any historic landmark and community for the sake of increasing freeway traffic flow by 2 minutes.**

An EIR would determine destroying the historic fabric, given the MND findings, does not justify building the 110FF project. The precedent for requiring an EIR is based on the following.

Pocket Protectors **[residents]** challenged a city's approval of a residential project based on a mitigated negative declaration, and sought to compel the city to prepare an EIR analyzing the project's impacts on aesthetics, among other impacts. (Pocket Protectors, supra, 124 Cal.App.4th at p. 929.) The appellate court concluded that comments from area residents to the effect that "long double rows of houses **[in our case, the 110FF]** flanking a narrow private street" would create a displeasing "tunneling" or "canyoning" **[in our case, the concrete flyover]** effect was sufficient to support a fair argument that the project would have a significant impact on aesthetics. (Id. at p. 937; Guidelines, § 15064, subd. (f).) Thus, the court reversed the city's approval of the project based on the mitigated negative declaration and required the city to prepare an EIR. (Pocket Azri'el 8

Protectors, supra, at p. 940.) **Given the substantial negative impact upon the historic fabric and aesthetics, an EIR is required.** Azri'el 8

In totality, the 110FF should not be built. The negatives do not outweigh the benefits. Azri'el 9

Best Regards,

Yosef Azri'el
University Park Resident

Azri'el 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Azri'el 2: The commenter's opinion is noted. The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

This study is being funded by a Federal grant that is administered by Metro. However, there is no funding identified for construction of this project. The current estimated cost for construction is $43 million.

Azri'el 3: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Azri'el 4: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Azri'el 5: Cumulative traffic impacts were analyzed in section 2.4 of the environmental document. Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of this proposed project. At the regional level, the proposed project is included in 2016 Regional Transportation Plan (RTP). Thus, the cumulative impacts from the proposed project at the regional level have been accounted for under the programed Initial Study/Environmental Assessment Report of the RTP and the proposed project would not result in cumulative impacts at the regional level.

At the local level, the proposed project would improve the operational efficiency and safety of the studied intersections discussed in section 2.1.8. Therefore, the build conditions would provide an improvement in delay times at intersections analyzed versus the No Build conditions. Because the proposed project would have a beneficial impact on traffic, adverse cumulative impacts are not anticipated once the project is operational.

However, construction activities for one or more of the related projects in the area could result in temporary, localized, site-specific disruptions, including partial and/or complete street and lane closures and detours. If the activities occur at the same time, this could cumulatively increase response times for emergency vehicles during construction. Potential disruptions to emergency services could be avoided through implementation of minimization measure T-1 described in section 2.1.8. Further, the preparation of a TMP would take into consideration other projects in the area.

Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans:

Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information.

Motorist Information: Provide project information using changeable message signs and ground mounted signs.

Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling.

Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction.

Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.

Azri'el 6: The commenter's disagreement is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Azri'el 7: The commenter's opinion is noted. No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

Azri'el 8: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may have a significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Azri'el 9: The commenters support for the No Build Alternative is noted. The commenter's opinion is noted.

Rule of Reason

Under the Rule of Reason, a viable alternative to destroying the historic fabric of St. Vicente de Paul Church and St. John's Cathedral is to build an off ramp at Washington Blvd. Unknown 1

The proposed Washington Blvd. off ramp would provide Caltrans with its desired increased traffic flow of 2-5 minutes without destroying the historic fabric of West Adams.

There is no need to build the I-110 Flyover

Unknown 1: The commenter's opinion is noted. No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

The commenter's proposed alternative is infeasible, and does not meet the purpose and need of the project. Washington Blvd off-ramp is not in the scope of the work of this project. However, extension of the HOT Elevated Structure up to the Washington Blvd. would require more bents to be constructed at extremely critical locations. Further, long-term local streets and Freeway closures will be required. Lastly, a longer construction period would be required, which would increase potential impacts as well as construction costs.

The commenter's support for the No Build Alternative is noted.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Karen Uhler

Organization / Organización:
St. John's Cathedral

Email or Mailing Address / Correo Electrónico o Dirección Postal:
kuhler4@ad.com

I have many concerns re this project and approve the plan. It will have great impact on the traffic congestion in area. Only help the wealthy freeway users for orientation minutes. It will impact the historic building in the area. As a medical professional you will have trouble crossing. Neither will not be any environmental problems/impacts. It will divide the neighborhood. As a cathedral parishioner it will impact all the religious services held there

Uhler 1

Uhler 1: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

The Hot Lanes Flyover Structure will not be limited to individuals who can afford to use the HOT Lanes only. Buses will be able to use the Flyover to get passengers to their destinations. There are currently 213 transit trips/weekday that travel on the NB I-110 Express Lanes and exit at Adams Blvd. Metro Silver Line ridership has increased from 89,683 trips per month (Northbound only) in November 2012 to 112,102 (Northbound only) per month in November 2015.

Transit Provider	Average Weekday Ridership (Nov 2015, NB only)
Metro Silver Line	4,662
Metro Line 450	577
Gardena Transit	355
LADOT Commuter Express	634
Torrance Transit	107
Orange County Transportation Authority	118
Total	6,453

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

Access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
VALARIA M. LINCOLN

Organization / Organización:
St. John's Cathedral

Email or Mailing Address / Correo Electrónico o Dirección Postal:

I am a fifth generation Angeleno who has been a member of St John's since 1961 when I moved to Los Angeles.
What you propose with this flyover will cause deterioration of the building, change the ability to hear and all of those things mentioned in the meeting. In the 1990's a Tornado went straight down Figueroa past St Johns - destroying everything in its path except St Johns. Instead it simply detached the cross on the roof laying it softly on the roof.
God will prevent your efforts.

Lincoln 1

Lincoln 1: The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The remainder of the comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
Jeffrey C. McLellan

Organization / Organización:
St John's Episcopal Church

Email or Mailing Address / Correo Electrónico o Dirección Postal:
623 N. Bandini St
San Pedro, CA 90731

I am opposed to the Flyover! Noise↑ Dust↑ Increased traffic outside my place of worship. 5 years of construction & $40M? I am not convinced this construction will not damage our historic building. It will be a visual disaster for the neighborhood. Mchellan 1
Parking will be negatively affected on Flower during construction. Big impact on our church & the neighborhood!
This is not industrial L.A. anymore!
This is a blossoming neighborhood and this project will not only divide us physically, but will inhibit pedestrian traffic & retail.

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& residential development.
Will Fastrak become permanent? Mchellan 2
What If ~~the~~ the HOT lanes become carpool lanes again? Perhaps this project will be less necessary to manage this bottleneck at Adams/Fig/Flower.

Please submit any written comments, no later than Monday, March 21, 2016, to:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

Por favor, envíe cualquier comentario por escrito, a más tardar el lunes 21 de marzo de 2016, a:

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
Proyecto de puente elevado del carril de peaje de alta ocupación de la I-110
100 South Main Street, MS 16A
Los Angeles, CA 90012

Mchellan 1: The commenter's opinion is noted. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for more details.

The proposed project has construction durations of approximately 2.5 years. Emissions from the construction activities therefore are considered temporary pursuant to 40 CFR93.123(c) (5). During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to construction. With the incorporation of the proper avoidance, and minimization measures summarized in Table 1 of the environmental document potential air quality impacts will be minimized.

In addition to fugitive dust emissions, heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO2, NOx, VOCs and some soot particulate (PM10 and PM2.5) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to certain sensitive receptors, certain construction activities, e.g., extended idling, material storage, and equipment maintenance, would need to be conducted in areas at least 500 feet away from those sensitive receptors.

The proposed project will improve air quality in the future. Caltrans Office of Environmental Engineering (Air Quality Branch) has evaluated the proposed Build Alternative for operational and temporary construction impacts on the ambient air quality in the project vicinity. The carbon monoxide (CO) hot spot analysis demonstrates that the project meets conformity requirements. The Southern California Association of Governments' (SCAG) Transportation Conformity Working Group has concurred that the project is not an air quality concern for Particulate Matter (PM) 10 and PM2.5. There would be a decrease in emissions of some Mobile Source Air Toxics (MSAT) such as diesel particulate matters in 2023 and 2040 when compared to the base year conditions. MSAT emissions would likely be further reduced in the future due to implementation of future vehicle and fuel regulations by the Air Resource Board and the Environmental Protection Agency.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA.

Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

As mentioned in Table 10 of the environmental document, there are 10 parking spots within State right of way on Figueroa Way that are being used by the businesses located in the nearby strip mall informally (this area is not leased from the State by any particular business). These 10 parking spots will be used for this project. There is ample parking within the strip mall. The Build Alternative would not result in temporary or permanent adverse effects related parking. No neighborhood facilities or services that are needed and valued by the neighborhood residents will be temporarily or permanently impacted as a result of the proposed Build Alternative.

According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period. There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons.

The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

Mchellan 2: Because the Metro ExpressLanes program is designed to 'move more people, not more cars,' Metro has implemented multiple strategies to improve and promote transit service and carpooling along the I-10 and I-110 corridors. First, Metro provides transit subsidies to the Metro Silver Line, Foothill Transit, Torrance Transit, and Gardena Transit to increase the number of transit trips traveling on the ExpressLanes. As a result, each weekday 213 transit trips carrying approximately 6,450 passengers travel on the I-110 ExpressLanes, exit at Adams Blvd., and continue on to downtown Los Angeles. Ridership gains have been particularly strong on the Metro Silver Line, which has increased 25% from 89,000 monthly trips in November 2012 to 112,000 in November 2015.

To encourage carpooling, Metro offers rewards to customers who choose to carpool on the ExpressLanes. Whenever a Metro ExpressLanes account holder carpools on the ExpressLanes, the Carpool Loyalty Program automatically enters them into a monthly drawing for a chance to win gift card rewards. Each month, 40 winners are selected from this pool of carpoolers-10 HOV2 winners for each corridor, and 10 HOV3+ winners for each corridor. 2-person carpools (HOV2) receive $20, and carpools of 3 or more people (HOV3+) receive $30 in the form of Visa gift cards, but they can also select to receive toll credits instead.

Furthermore, the Metro ExpressLanes' Low-Income Assistance Plan (formerly called the Equity Plan) provides a discount to qualifying LA County residents who sign up for a Metro ExpressLanes account. Low-Income Assistance Plan account holders receive a $25 discount when they sign up, and also have their $1 monthly maintenance fee waived.

Since the inception of ExpressLanes, Metro has seen significant increases in carpool trips. In particular, of the trips that exited the I-110 ExpressLanes at Adams Blvd. two person carpools increased from 15,389 to 71,179 monthly trips and three person carpools increased from 5,847 to 38,561 monthly trips. The growth in carpools is such that more than half of all trips using the Adams Blvd. off ramp today are carpools.

In addition to transit subsidies, the Carpool Loyalty Program and Low Income Assistance Plan, Metro also grants net toll revenue, which is toll revenue remaining after operations and maintenance expenses are paid for. These grants are awarded to projects that improve mobility in the I-110 and I-10 corridors including roadway, active transportation, and transit projects. In 2014, over $20 million was granted and in 2016 Metro expects to award another $20-24 million.

Though single occupant vehicle trips using the Adams Blvd. off-ramp increased from 40,045 in November 2012 to 95,046 in November 2015, this represents less than half of the total number of monthly trips (204,786) in November 2015. It is likely that many of these trips were not discretionary and without the ExpressLanes would have been made in the general purpose lanes, increasing congestion for all travelers in the corridor. However, by providing a choice to use the ExpressLane the single occupant driver realizes significant travel time savings and the tolls generated are used to fund increased transit service, the net toll grant program, Carpool Loyalty Program and Low Income Assistance Plan, all of which would not be possible without the ExpressLanes.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:

Dominic Lathos

Organization / Organización:

St. John's Church

Email or Mailing Address / Correo Electrónico o Dirección Postal:

dominiclathos@gmail.com

It saddens me that a church that I just became a part of and will be confirmed at in March will have to be overshadowed by a ramp that will allow commuters a shorter time in their cars. My spirituality and the role of faith in my life and those that attend church with me will be compromised because of this project. The worship that brings our diverse and thriving congregation together will be negatively affected as a result of the construction of this ramp. To compromise a space that fulfills the heart, soul, and sense of community for many Angelenos would be heinous and unnecessary. Lathos 1

Lathos 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre: Edgar Soto
Organization / Organización: St. John's Cathedral
Email or Mailing Address / Correo Electrónico o Dirección Postal: garixd@gmail.com

Is the federal grant with a proximal deadline because a proposed 95 million dollars of funds may to save approx. 1-2 mins of traffic seems like an inefficient allocation of funds when it affects only a significant historical area 1-2 mins apart from by an inefficient use of funds but will destroy the way of working of a couple centuries.

In short, the makers of a great Los Angeles are not relieving by increasing car transportation but by making the transit system in place more efficient.

Soto 1

Soto 1: The commenter's opinion is noted. This study is being funded by a Federal grant that is administered by Metro. However, there is no funding identified for construction of this project. The current estimated cost for construction is $43 million.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Metro

Caltrans

I-110 High-Occupancy Toll Lanes Flyover Project

Comment Sheet

Name / Nombre:
The Rt Rev Catherine Roskam

Organization / Organización:
St James Episcopal Church and School
3903 Wilshire Blvd LA CA 90010

Email or Mailing Address / Correo Electrónico o Dirección Postal:
croskam@saintjamesla.org

I was in NY during the time of Robert Moses. This project seems like a throw back to that era, when cars and oil reigned and projects were built at the expense of some of the most culturally and ethnically rich communities in NY. Roskam 1

This project will destroy this neighborhood. But even greater as a consideration is that this is no longer the 1950's.

It's 2016. Our tax money should not be spent on this folly but on directly needed water reclamation, public transit and the repair of already existing roads that are among the worst in the country. Also a proper EIR is essential. Roskam 2

Roskam 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Roskam 2: Commenter's suggestion of completing an EIR/EIS is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Metro Comments on I-110/Adams Flyover Environmental Document

	Comment	Response
1	On page 13, please add LADOT Commuter Express lines 438 and 448 to the list of transit lines that operate on the Harbor Transitway.	METRO 1
2	On page 15, the report says that five key intersections were analyzed but the results are only listed for four: Figueroa/23rd, Figueroa/Adams, Flower/Adams, and Adams Blvd./I-110 Adams off ramp. Is there a fifth?	METRO 2
3	The document lists the eleven alternatives that were analyzed for this project. To assist the reader in understanding what these alternatives entail, we suggest creating diagrams that illustrate each of the project alternative described on pages 23-27	METRO 3
4	The report should illustrate the significant usage of the facility by transit riders and carpoolers. For example, there are 213 transit trips/weekday that travel on the NB I-110 ExpressLanes and exit at Adams Blvd. from five transit providers: Metro, Gardena Transit, LADOT, Torrance Transit, and the Orange County Transportation Authority. Furthermore, the average weekday ridership on buses using the Adams off ramp is approximately 6,453 riders.	METRO 4
5	Construction of the flyover would significantly benefit the Metro Silver Line and should be noted in the document. The average monthly ridership of the Metro Silver Line in the northbound direction has increased from 89,683 in November 2012 to 112,102 in November 2015. This project would improve travel reliability and speed, which would in turn provide a greater incentive to ride the Silver Line.	METRO 5

6	The report should highlight the increases in carpool usage of the I-110 ExpressLanes and specifically the Adams Blvd. off ramp. Total trips exiting the I-110 ExpressLanes at Adams Blvd. have increased from 61,281 in November 2012 to 204,786 in November 2015. More importantly, HOV2 trips have increased from 15,389 in November 2012 to 71,179 in November 2015. HOV3 trips have increased from 5,847 to 38,561 in the same period. Today, more than half of all trips using the off ramp are 2 or 3 person carpools.	METRO 6
7	While the delay savings per vehicle are indicated in the report, the report should also highlight the cumulative time savings that the project would generate. For example, there are 1,600 trips exiting the ExpressLanes at Adams Blvd. per weekday during the AM peak. If each trips saves 101 seconds of delay, the total time savings would be 44.4 hours every morning.	METRO 7
8	There have been numerous changes that have occurred in the project area since opening of Harbor Transitway in 1998 that have a significant impact on traffic in the project area including the Galen Center, new apartment complexes such as the Lorenzo, and new businesses such as automobile dealerships on Figueroa. These changes should be described in the report. By remaining silent on these changes, there is tacit approval that demographic, congestion, mode split, land uses, population,etc. have remained the same in the last two decades obviating the need for the proposed improvements.	METRO 8
9	To improve readability, we suggest providing more detail on the methodology and calculations used to quantify the accident rates listed on page 98.	METRO 9
10	Metro believes Caltrans studied reducing the height of the flyover to 31 feet based on discussions with Metro rail operations. However, it was determined the descent would be too sharp and result in excessive speed. Can Caltrans confirm this to be true?	METRO 10

11	Suggest the report conduct additional traffic analyses in the project area. The report analyzes LOS at the I-110 Adams Blvd off ramp, Figueroa/Adams, and Flower/Adams intersections. Suggest the report conduct turning movement counts for vehicles exiting at Adams Blvd, analyze arterial LOS on Adams, Flower, Figueroa St, Figueroa Way, and 23rd Street. in order to better quantify traffic impacts in the area.	METRO 11
12	Metro believes additional sound mitigation measures should be considered including soundwalls and pavement.	METRO 12
13	Suggest the appendicies referenced in the report such as the traffic report and Value Analysis study be made available to the public	METRO 13
14	Suggest Caltrans conduct more detailed analysis of the interface of the flyover and its impacts on MyFig, in particular the merge of Figueroa Way onto Figueroa St.	METRO 14
15	Did Caltrans analyze the number of pedestrian and bike trips and accidents in the study area?	METRO 15

METRO 1: LADOT Commuter Express lines 438 and 448 have been added to the list of transit lines that operate on the Harbor Transitway in section 2.1.8 of the environmental document.

METRO 2: This is a typo and has been corrected. Four (4) Key intersections were analyzed not five (5).

METRO 3: Diagrams and detailed explanations of alternatives considered but eliminated from further discussion can be found in the Value Analysis Study Report (January 2013), which is available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov). The environmental document provides a brief description.

METRO 4: Information on usage of the facility by transit riders and carpoolers has been added to the environmental document in section 2.1.8.

METRO 5: Information on the benefit of the flyover on the Metro Silver line is now noted in the environmental document in section 2.1.8.

METRO 6: This information has been added to the environmental document in section 2.1.8.

METRO 7: This information has been added to the environmental document in section 2.1.8

METRO 8: This information has been added to the environmental document in section 2.1.8.

METRO 9: This information has been added to the environmental document in section 2.1.8.

METRO 10: The Design Team is not aware of the flyover height being proposed at 31 feet. Below are the measurements of items that restrict the design and height of the flyover structure:

- Light Rail contact wire height 19 feet
- Light Rail Construction clearance 10 feet
- Space for safe scaffoldings and false work is about 10 feet
- Deck depth at the pick is 16 feet (close to Bent 6)

However, during the design phase of the project; Caltrans will be able to search for possible new construction methods to cut down the maximum height, which would lower the grades.

METRO 11: The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. Therefore, arterial LOS analysis on Adams Blvd., Figueroa Street, Figueroa Way, 23rd Street is not necessary since the traffic volume will remain relatively the same.

METRO 12: Soundwalls/noise barriers are typically the most (often only) feasible and reasonable noise abatement measures available, especially in urban areas. Within the project limit, noise impacts have been identified for qualifying noise sensitive areas (residential, churches, hospital/medical facilities). Noise abatement in the form of noise barriers were considered, however, they were determined to be acoustically not feasible/reasonable. In reviewing the project alternatives/location, there doesn't seem to be other feasible/reasonable measures available. Only other measure that can be considered is building insulations to qualifying areas (school classroom, church/worship hall, hospital/medical facility), however, based on the Traffic Noise Study (April 2015), they did not meet/exceeded interior criteria/threshold levels.

METRO 13: Technical Studies/supporting documents to the environmental document are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

METRO 14: Design details of how the proposed project will intersect with the protected bike lane on Figueroa will be developed in the design phase of the project, but a preliminary design that is currently being considered refer to Figure 29 of the environmental document. Impacts to the bicycle and pedestrian environment on Figueroa Street is not anticipated because the traffic at the intersection of Figueroa Way and Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets

two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

METRO 15: Pedestrian and bicyclist's activities were observed on several field visits. Pedestrian and bicycle accidents on local streets are issues that should be communicated and are handled by the City of Los Angeles analysis of such accidents is not required for this project. Traffic accident data was analyzed in section 2.1.8 of the environmental document.

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April 21, 2016

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Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration/Environmental Assessment; SCH No. 2013021002

Dear Mr. Kosinski and Mr. Damrath,

Thank you for providing the California Preservation Foundation (CPF) with the opportunity to provide comments regarding the Mitigated Negative Declaration (MND)/Environmental Assessment (EA) for the 110 Flyover Project. CPF is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

We have serious concerns regarding the impacts that would result from this Project and the adequacy of the environmental review documents that have been prepared to analyze the impacts. In addition to the comments provided herein, we join in the concerns expressed by the West Adams Heritage Association, Adams Dockweiler Heritage Organizing Committee, the National Trust for Historic Preservation and other community groups regarding this Project's impacts on important historic resources and the existing community. CPF urges Caltrans to carefully analyze these impacts in a full environmental impact report (EIR)/environmental impact statement (EIS). Heitzman 1

I. An EIR/EIS is Required.

Because issuing an MND truncates the CEQA process with often minimal environmental review, CEQA's "legal standards reflect a preference for requiring an EIR to be prepared." (Mejia v. City of Los Angeles (2005) 130 Cal. App. 4th 322, 332.) An agency proposing to rely upon an MND must make the analysis accompanying the proposed MND as complete and comprehensive as possible. (Long Beach Savings and Loan Assn. v. Long Beach Redevelopment Agency (1986) 188 Cal. App. 3d 249, 263.) When considering whether to require preparation of a full EIR or allow review culminating in an MND instead, a court will examine whether there is substantial Heitzman 2

Heitzman 2

evidence in the record to support a fair argument that the stated mitigation measures may not achieve the goal of reducing impacts below a level of significance. (Citizen's Com. To Save Our Village v. City of Claremont (1995) 37 Cal. App. 4th 1157.) If any substantial evidence of a potential environmental impact after the agency's proposed mitigation measures are implemented exists, then preparation of an MND is not appropriate, even if substantial evidence exists to the contrary. (Public Resources Code § 21080(d); CEQA Guidelines § 15064(f)(1); Friends of "B" Street v. City of Hayward (1980) 106 Cal. App. 3d 988, 1002.)

An EIR must be prepared instead of a MND when there is substantial evidence to support a fair argument that the project may have significant adverse environmental impacts. (Public Resources Code § 21151.) "The fair argument standard is a 'low threshold' test for requiring the preparation of an EIR." (Pocket Protectors v. City of Sacramento (2004) 124 Cal.App.4th 903, 928.) "If there is substantial evidence of a significant environmental impact, evidence to the contrary does not dispense with the need for an EIR when it can still be 'fairly argued' that the project may have a significant impact." (Friends of "B" Street v. City of Hayward (1980) 106 Cal.App.3d 988, 1001; see also CEQA Guidelines § 15064.) Courts show a clear preference for resolving doubts in favor of preparing an EIR. (Architectural Heritage Association. v. County of Monterey (2004) 122 Cal.App.4th 1095, 1110; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1996) 42 Cal.App.4th 608, 617-618; Heitzman 3 Stanislaus Audubon Society, Inc. v. County of Stanislaus (1995) 33 Cal.App.4th 144, 151; Quail Botanical Gardens Foundation, Inc. v. City of Encinitas (1994) 29 Cal.App.4th 1597, 1602-03.) Here, there is substantial evidence to support a fair argument that the 110 Flyover would have significant historic resource, aesthetic, land use, traffic and noise impacts; thus, an EIR should be prepared.

The National Environmental Policy Act (NEPA) likewise requires preparation of an EIS. An EIS must be prepared if substantial questions are raised as to whether a project may cause significant degradation of some human environmental factor." (Blue Blue Mountains Biodiversity Project v. Blackwood 161 F.3d 1208, 1212 (9th Cir. 1998).) Plaintiffs "need not show that significant effects will in fact occur, but only that there are substantial questions whether a project may have a significant effect." (Center for Biological Diversity v. National Highway Traffic Safety Admin. 538 F.3d 1172, 1219-20 (9th Cir. 2008).) In reviewing an agency's decision not to prepare an EIS, the court must determine whether the agency has taken a "hard look" at the consequences of its actions "based on a consideration of the relevant factors." (Blue Mountains, supra, 161 F.3d at 1211.) A decision not to prepare an EIS is unreasonable if substantial questions are Heitzman 4

raised regarding whether the proposed action may have a significant effect upon the human environment and the agency fails to "supply a convincing statement of reasons why potential effects are insignificant." (Ibid.)

When the consequences of a federal action are "controversial, that is, when substantial questions are raised as to whether a project ... may cause significant degradation of some human environmental factor, or there is a substantial dispute [about] the size, nature, or effect of the major Federal action," an EIS must be prepared. (National Parks & Conservation Ass'n v. Babbitt 241 F.3d 722, 736 (9th Cir. 2001).) "[W]hen evidence, raised prior to the preparation of an EIS or FONSI, casts serious doubt upon the reasonableness of an agency's Heitzman 5 conclusions," the burden is on the agency to come forward with a "well-reasoned" and "convincing statement" demonstrating that there is no public controversy regarding the project's potential environmental consequences. (Id. at 736.)

II. The Stated Purpose and Need Relies on an Unsupported Baseline Conclusion.

The MND/EA finds that the 110 Flyover Project is required in part due to safety concerns because the current off-ramp is a concentrated accident location. The accident rate assumed by the MND/EA is .23, which is not Heitzman 6 statistically higher than the average accident rate of .21. Also, the MND/EA fails to disclose what data was used

to calculate the average accident rate. This is an adequate basis upon which to approve a more than $50 million project with many significant impacts. Heitzman 6

III. The MND/EA Fails to Adequately Analyze the Project's Impacts.

A. Historic Resource Impacts.

Of great concern to CPF is the adverse impact this Project would have on the historic West Adams neighborhood and the National Register listed resources located near the Project site. The massive flyover structure, proposed to be built 54 feet above existing street level, would dominate and overpower the visual landscape for this historic area. The MND/EA fails to acknowledge the impact the imposing flyover would have on the historic West Adams neighborhood and its many historic resources, including: the Automobile Club of Southern California; St. Vincent de Paul Church; the Stimson House; the Slauson House; and the Chester Place National Register District. The significant impacts of the Project must be analyzed in an EIR/EIS. Heitzman 7

The MND/EA acknowledges that that the Project would have a significant impact on St. John's Church, but then assumes that a memorandum of agreement (MOA) with the State Office of Historic Preservation would mitigate these impacts to a less than significant level. This is improperly deferred mitigation. Further, mitigations that have been proposed to be included in the MOA are far from adequate. Interpretative features and mobile exhibits regarding the historic significance of the West Adams neighborhood are positive additions, but they do not mitigate the impacts of the massive flyover structure on the adjacent St. John's Church. CEQA clearly requires consideration of a project's impacts on the setting of an historic resource. (CEQA Guidelines §15064.5(b).) Heitzman 8

B. Aesthetic Impacts.

Currently, there are striking views of the St. Vincent's Church from the northbound 110, enjoyed by the many residents, commuters and visitors that traverse the freeway daily. The massive flyover structure would obscure these valued views, resulting in a significant aesthetic impact. Heitzman 9

The MND/EA also fails to disclose the Project's impacts on west-facing views of historic resources from West Adams Boulevard east of the 110. Currently, this view is framed by St. John's Church and the Automobile Club on the south and St. Vincent's Church on the north. After construction of the Project, these historic views would be blocked and diminished by the flyover. Heitzman 10

The many cars using the 54 foot tall flyover would also serve as a new source of nighttime lighting that should be evaluated in an EIR/EIS. Heitzman 11

C. Land Use Impacts.

It appears that this Project is an effort by Caltrans to unilaterally change the City of Los Angeles' traffic plans for the West Adams area of the City. The Project would conflict with the City's MyFig Plan for Figueroa Avenue by forcing a change in bike and pedestrian routes. It would also eliminate an existing Silver Line stop, limiting transit availability. Heitzman 12

Despite scoping comments requesting Caltrans do so, the MND/EA fails to consider the urban decay impacts associated with the Project. Business along West Adams would be less desirable due to the overshadowing Heitzman 13

Heitzman 13

flyover. The Project would also shut down Figueroa Way to vehicular traffic reducing access and visibility; the impacts of this change on businesses along Figueroa Way must be evaluated.

The Project would also serve to divide the West Adams neighborhood. The flyover would serve as a barrier to pedestrians who have safety concerns regarding walking under the flyover. Also, noise would be reflected and concentrated under the flyover structure, making a walk beneath extremely loud and unpleasant, deterring pedestrians. Heitzman 14

D. Noise Impacts.

The MND/EA found the noise level resulting from the Project would have an impact at the adjacent hospital. The MND/EA states that a barrier along the right of way to protect the hospital is infeasible. (MND/EA p. 186.) Heitzman 15 Because a significant impact would result due to noise and vibration impacts at the Orthopedic Institute for Children, the Project cannot be approved without preparation of an EIR/EIS.

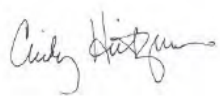
E. Greenhouse Gas Impacts.

The MND/EA acknowledges the Project would result in an increase in greenhouse gas emissions. (MND/EA p. 230.) This is because the Project would encourage additional vehicular traffic. Instead of determining whether this impact is significant, the MND/EA merely concludes that it is too speculative. CEQA requires more. An Heitzman 16 EIR/EIS must be prepared to analyze this potentially significant impact and mitigation measures to reduce greenhouse gas emissions must be analyzed. (See CEQA Guidelines §15126.4(c); Center for Biological Diversity v. California Dept. of Fish and Wildlife (2015) 62 Cal.4th 204.)

Conclusion

For all of these reasons, we urge you to prepare a full EIR/EIS to ensure that any proposed project is sensitive to West Adam's important historic resources and the surrounding community. Thank you for your time and consideration in this matter. Heitzman 17

Yours truly,



Cindy L. Heitzman
Executive Director

Heitzman 1: The commenter's concerns are noted. Commenter's suggestion of completing an EIR/EIS is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Heitzman 2: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Heitzman 3: The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment. The commenter states that the substantial evidence is that there would be a significant impact on historic resources, aesthetics, land use, traffic and noise, but since no evidence was provided by the commenter. Therefore, this portion of the comment is considered the commenter's opinion.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Land use plans and findings were discussed in Section 2.1.1 of the environmental document. No change in land use is anticipated as a result of this project.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated as the commenter suggests.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 in the environmental document for further details.

Heitzman 4: Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may have a significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Heitzman 5: The commenter disagrees with the findings in the environmental document, and has not provided evidence that supports the need for an EIS. The commenter states that this federal action is "controversial, that is, when substantial questions are raised as to whether a project…may cause significant degradation of some human environmental factor, or there is a substantial dispute [about] the size, nature, or effect of the major Federal action, and EIS must be prepared." Commenter has not raised substantial questions nor has the commenter provided a substantial dispute.

Heitzman 6: Accident data is explained in section 2.1.8 of the environmental document, which has been updated to explain methodology of accident rate calculations. Traffic Accident Surveillance and Analysis System (TASAS) selective record retrieval summary and accident rates for the following period of three (3) years (10/01/2010 and 09/30/2013) are as follows:

The TASAS history analysis revealed a total of 265 accidents (1 fatal, 77 injury, and 178 PDO) within the time period. The primary collision factors identified were speeding (206), improper turn (9), other violations (37), under influence of alcohol (11), other than driver (1), and following too closely (0), where 249 and 16 collisions occurred when the roadway was dry and wet, respectively.

Most of the collisions reported took place when there was no unusual roadway condition. There were 182 collisions which occurred in daylight, 69 in dark with street lights, 8 in dark with no street lights, and 6 in dusk/dawn. For movement preceding collisions, there were: proceeded straight (239), stopped (153), changing lanes (37), slowing/stopping (45), and other (14). Locations of collisions are as follows: interior lanes (177), left lane (45), and right lane (44), beyond shoulder driver's right (7), beyond shoulder driver's left (7), HOV lane (3), right shoulder area (2), and left shoulder area (1). The types of collisions were: 210 rear-end, 37 sideswipe, 14 hit-objects, 2 broadsides, 1 overturn, and 1 head-on. The object struck median barrier (7), guardrail (5), overturned (1), wall (except sound wall) (2), and other object on road (1). Table 14 in the environmental document shows Northbound selective accident rate calculations and it shows a higher than average accident rate for I-110 NB HOT lane off-ramp to Adams Blvd.

Table 14: TASAS– Northbound Selective Accident Rate Calculation

Location	Fatal Accident Rates					
I-110	Actual (Accidents/MVM)			Average (Accidents/MVM)		
	Fatal	F + I	Total	Fatal	F + I	Total
I-110 NB HOT/Express Lane off-ramp to Adams Boulevard PM 20.54	0.000	**0.23**	0.59	0.003	0.21	0.62
I-110 NB off-ramp to Mixed flow off-ramp to Adams Boulevard PM 20.478	0.00	**0.62**	**1.56**	0.003	0.35	1.01
I-110 Mainline NB Freeway PM 20.10-20.92	0.008	**0.64**	**2.18**	0.004	0.31	1.04
Location	TASAS Selective Records Retrieval Summary					
I-110 Between PM 20.10-20.92	TASAS of all crashes between 10/01/2010 and 09/30/2013			Type of Collision 10/01/2010 and 09/30/2013		
	total Collision	fatal Collision	"fatal+injury" Collision	Rear End	Hit Object	Sideswipe
I-110 NB HOT/Express Lane off-ramp to Adams Boulevard PM 20.54	**5**	0	**2**	3	0	1
I-110 NB off-ramp to Mixed flow off-ramp to Adams Boulevard PM 20.478	**15**	0	**6**	8	3	3
I-110 Mainline NB freeway PM 20.10-20.92	**265**	1	**78**	210	14	37

Source: Draft Project Report (September 2015)

Between the period of 10/01/2010 and 09/30/2013, at the NB Route 110 HOT lane off-ramp (PM 20.540), the actual "fatal + injury" accident rates are slightly higher than the average accident rates. Between the period of 10/01/2010 and 09/30/2013, at the NB Route 110 mixed flow off-ramp (PM 20.478), the actual "fatal + injury" accident rates are higher than the average accident rates but and "total" actual accident rates are 50% higher than the average "total" accident rates. Between the period of 10/01/2010 and 09/30/2013, along the NB Route 110 mainline (PM 20.10 and PM 20.92), the actual "fatal + injury" and the "total" accident rates are higher than the average accident rates. The fatal accident occurred on 9/10/2011 were caused by a speeding motorcycle that rear ended a car, then the motorcycle's driver was ejected and collided with the roadway.

Heitzman 7: The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House is outside the boundaries of the established project area of Potential Effects as well as the Supplemental Area of Potential Effects (APE). No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Heitzman 8: The commenter's opinion is noted. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Heitzman 9: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Heitzman 10: West facing views of historic resources (west of Adams Blvd. and east of the 110) would not be impacted, pedestrians and persons in cars traveling westbound on Adams Blvd. (east of Route 110) might have a partial view of the Auto Club Building and St. Vincent's Church, but as they progress westward the view would be pronounced. A strip mall located on the north side of Adams Blvd. (east of Figueroa Street) presently obstructs views to the front entrance to St. Vincent's Church if traveling westbound on Adams Blvd. The view to the Auto Club Building (front entrance) is currently obstructed when traveling westbound on Adams Blvd. by the Mobil Gas Station pump bay overheard structure located on the south side of Adams Blvd. (east side of Figueroa Street). Constructing the flyover would not obstruct views to these historic resources for the average person at ground level as the structure would be above their field of vision.

Heitzman 11: The height of the standard type 76 railing on the bridge would eliminate potential headlight glare from vehicles on the flyover. Therefore, headlight glare would be negligible.

Heitzman 12: The Project Development Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will complement MyFig Project. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. Enhancing traffic flow at this location will induce travel demand by encouraging drivers to use the new facility. In the traffic study, Caltrans considered a 20% increase in traffic for future analysis, even though, MyFig Project will discourage some motorists to use the proposed ramp to access Figueroa Street. MyFig Project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

Further, the proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.

Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

The Metro Silver Line bus stop on Figueroa Way will be consolidated with the currently existing bus stop on Figueroa Street and 23rd Street, which is approximately 0.2 miles away from the current location. Therefore, bus service will still be available.

Figueroa Way will be re-designed as a pedestrian and bicycle corridor, which will make it less likely to become a homeless encampment (see Figure 21 of the environmental document). The re-design may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community. Therefore, permanent impacts to pedestrians and bicyclists are not anticipated as a result of the proposed Build Alternative.

Heitzman 13: The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses. Also, no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period. Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons.

Heitzman 14: Commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the proposed project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Commenter has not provided evidence to support the statement that the structure would divide the community.

Figueroa Way will be re-designed as a pedestrian and bicycle corridor, which will make it less likely to become a homeless encampment (see Figure 21 of the environmental document). The re-design may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community. Therefore, permanent impacts to pedestrians and bicyclists are not anticipated as a result of the proposed Build Alternative.

The Los Angeles Police Department (LAPD) has jurisdiction of the project area. Policing and safety concerns should be communicated to LAPD.

Caltrans noise investigation found that future noise levels will be similar to the existing condition with the proposed Build Alternative. Refer to section 2.2.5 of the environmental document.

The remainder of this comment is considered the opinion of the commenter and does not require further response.

Heitzman 15: Table 31 in the environmental document shows that the orthopedic Institute for Children (403 West Adams Blvd.) has an existing noise level of 64.8 dBA. In 2040, No Build Alternative noise levels are predicted to be 67.5 dBA, and the future Build Alternative worst hour is predicted to be 67.7 dBA. This slight increase in noise level is not considered a significant impact because the change in noise level is so minor that it is barely noticeable to the human ear. Further, soundwalls/noise barriers are typically the most (often only) feasible and reasonable noise abatement measures available, especially in urban areas. Within the project limit, noise impacts have been identified for qualifying noise sensitive areas (residential, churches, hospital/medical facilities). Noise abatement in the form of noise barriers were considered, however, they were determined to be acoustically not feasible/reasonable. In reviewing the project alternatives/location, there doesn't seem to be other feasible/reasonable measures available. The only other measure that can be considered is building insulations to qualifying areas (school classroom, church/worship hall, hospital/medical facility), however, based on Caltrans' Traffic Noise Study (April 2015), they did not meet/exceeded interior criteria/threshold levels.

As far as construction vibration effects are concerned, based on construction standards in the Caltrans (2013) Transportation and Construction Vibration Guidance Manual, the probability of exceeding architectural damage risk amplitudes for continuous vibrations (such as excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment) from construction is very low, and from freeway traffic is practically non-existent.

However, if vibration concerns involve pavement breaking, extensive pile driving, or trains, 25 feet (7.5 meters) or less from normal residences, buildings, or unreinforced structures, damage is a real possibility. This may also be true if these operations occur within 50–100 feet (15–30 meters) from historic buildings, buildings in poor condition, or buildings previously damaged in earthquakes. In any case, extreme care must be taken when sustained pile driving occurs within 25 feet (7.5 meters) of any building, and 50–100 feet (15– 30 meters) of a historic building, or a building in poor condition. Although, the exact method of constructing the concrete column supports/bents has not been identified at this stage of the design process, Caltrans is only considering the use of vibration reduction construction methods, such as Cast-In-Place Concrete Piles or Jetting, for Alternative 2 (Proposed Build Alternative).

Additionally, construction-related ground disturbance in the immediate vicinity of St. John's Episcopal Church will occur between 160–230 feet from the east side of the St. John's Episcopal Church building. Therefore, no vibration effects to St. John's Episcopal Church building are anticipated. Although there is sufficient distance between the construction site and sensitive receptors, avoidance and minimization measures (summarized in Table 1 of the environmental document) will be implemented during the construction period in order to ensure that ground vibration is kept to a minimum.
The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may have a significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Heitzman 16: Climate change is a global issue and cannot be attributed to a single point source/location of GHG emissions. The goals for emissions reduction set forth by AB 32 have been set for the State of California and will be achieved at the State Level and regional levels with a comprehensive approach, including methods of reducing emissions from all sources.

CEQA requires a lead agency to make a good faith effort to identify impacts and gives the lead agency discretion on the approach used to analyze impacts. Caltrans has used the best available modeling data (CT EMFAC) to analyze greenhouse gas emissions related to the project and have disclosed a projected increase in CO2 emissions. While there is no scientific data available to link a single proposed project to the global greenhouse gas effects on a cumulative scale to climate change, Caltrans is committed to reducing GHG emissions as outlined in the environmental document.

As provided in the Air Quality Analysis (dated September 2015) in support of the environmental document, greenhouse gas emissions impacts in terms of carbon dioxides (CO2) have been estimated and evaluated for the project during construction as well as during operation in years 2023 and 2040. Please refer to Table 5 (below) of the Air Quality Analysis (September, 2015) for estimate of CO2 emissions during construction and Tables 15 through 17 for operational CO2 emissions in future years.

Table 5: Summary of Construction Emissions in lbs/day

	ROG	CO	NOx	PM10	PM2.5	CO2
Grubbing/Clearing	1.4	11.9	13.5	0.6	0.5	2,324.2
Grading/Excavation	10.6	80.4	109.2	4.8	4.4	17,057.3
Drainage/Utilities/Sub-grade	6.4	52.9	60.5	2.8	2.5	11,092.8
Paving	1.1	12.1	9.2	0.5	0.4	2,311.3
Maximum (lbs/day)	10.6	80.4	109.2	4.8	4.4	17,057.3
Total (tons)	3.2	25.4	32.0	1.4	1.3	5,337.6

Note: Calculation based on construction activities estimated by the project engineer.

Table 15: Comparison of GHG Emissions in 2014 (Existing) and 2023 (Opening) in tons/day

TAC	2014	2023			
	Exist. Ramp	No-Build	Build		
		Exist. Ramp	Exist. Ramp	New Ramp	Total
CO_2	0.856	1.031	0.197	1.078	1.275
CO_2 (Pavley)	0.784	0.73	0.14	0.762	0.902

Table 16: Comparison of GHG Emissions in 2014 (Existing) and 2040 (Horizon) in tons/day

TAC	2014	2040			
	Exist. Ramp	No-Build	Build		
		Exist. Ramp	Exist. Ramp	New Ramp	Total
CO_2	0.856	1.12	0.215	1.171	1.386
CO_2 (Pavley)	0.784	0.731	0.14	0.767	0.907

Table 17: Percent Changes in GHG Emissions in the Off-Ramps

TAC	2014	Opening Year 2023 (g/day)				Horizon Year 2040 (g/day)			
	Existing (g/day)	No-Build	Build	%Δ from Existing	%Δ from No-Build	No-Build	Build	%Δ from Existing	%Δ from No-Build
CO_2	0.856	1.031	1.275	49%	24%	1.12	1.386	62%	24%
CO_2 (Pavley)	0.784	0.73	0.902	15%	24%	0.731	0.907	16%	24%

Heitzman 17: The commenter's opinion is noted. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

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Submitted electronically
Ronald Kosinski and Garrett Damrath
Division of Environmental Planning
California Department of Transportation
100 S. Main Street, Suite 100 MS16A
Los Angeles, CA 90012
Email: francesca_smith@dot.ca.gov

May 18, 2016

RE: Proposed Mitigated Negative Declaration (MND)/Environmental Assessment (IS/EA), Interstate 110 High-Occupancy Toll Lanes Flyover Project

Dear Mr. Kosinski and Mr. Damrath:

Thank you for the opportunity to provide comments on the Interstate 110 High-Occupancy Toll Lanes Flyover Project and the Draft Initial Study with proposed Mitigated Negative Declaration (MND). We greatly appreciate the additional time granted to review materials before submitting our comments. The Los Angeles Conservancy is invested in working with Caltrans to identify and pursue all feasible and prudent alternatives that can avoid and minimize harm to historic resources.

We are doing this through the California Environmental Quality Act (CEQA) process as well as Section 106 as a consulting party. We also believe Section 4(f) applies and should be properly evaluated in terms of the proposed project and impacts. In regards to the CEQA process, the Conservancy is deeply concerned about Caltrans' intent on pursueing a Mitigated Negative Declaration (MND) rather than a full Environmental Impact Report (EIR). **Given the circumstances and evidence presented, CEQA requires Caltrans to prepare an EIR and consider feasible alternatives.**

Fine LAC 1

Fine LAC 2

The Conservancy strongly believes an EIR is required in this case, as the California Environmental Quality Act (CEQA)[1] is clear on this point where there is "substantial evidence in light of the whole record" that demonstrates the proposed project will result in significant impacts. Despite assertions stated otherwise by Caltrans in the Draft Initial Study and at the February 23, 2016 public meeting, the proposed impacts and effects cannot be adequately mitigated to a "less than significant" level or to a point where no significant effects would occur. An MND is woefully inadequate in light of the proposed project as is the analysis provided to date by Caltrans. It fails to acknowledge and address significant impacts as a result of the proposed project.

Fine LAC 3

A visual intrusion as a result of a proposed fifty-four-foot-high flyover structure and proposed project is clearly evident. It should be considered and treated as a significant impact that cannot be adequately mitigated to a less than significant level. Further, a Caltrans memorandum of December 11, 2015[2] referencing a November 23, 2015 email from within the Caltrans Cultural Resources Unit confirms that there is not universal agreement on this point even within Caltrans regarding impacts analysis. It specifically cites internal disagreement on this specific point and appears to disregard comments made by Caltrans own qualified cultural resource professional. In addition to case law, the CEQA Guidelines are clear that a conflict in expert opinion over the significance of an environmental impact normally requires preparation of an EIR.[3].

Fine LAC 4

The same December 11, 2015 Caltrans memorandum concludes proximity impacts not resulting in constructive use issues means the provisions of Section 4(f) are not triggered for this project. While our comments are primarily focused on the CEQA process at this time, we do want to address Section 4(f) since Caltrans states it is not applicable. The Conservancy respectfully disagrees. Section 4(f) clearly states and precludes project approval if there is a use of a historic site when a prudent and feasible avoidance alternative is available. Based on visual impacts as well as potentially noise, vibration, etc. there is a constructive use indirect impact on St. John's Cathedral. We believe there are feasible and prudent alternatives that have not been adequately explored. We strongly urge Caltrans and FHWA to revaluate its position on Section 4(f) and its applicability to the proposed project and undertaking.

Fine LAC 5

Substantial evidence supports a fair argument that the proposed project will cause a substantial adverse change to a historic resource(s), requiring prepartion of an Environmental Impact Report

"Since preparation of an EIR is the key to environmental protection under CEQA," an EIR is required "whenever it can be fairly argued on the basis of substantial evidence that the project may have significant

Fine LAC 6

[1] PRC §21080(c), 14 C.C.R. §15070
[2] Memorandum, Memo to File on Subject: Response to Cultural Resources Change in Level of Impact E-mail dated November 23, 2015. State of California, State Transportation Agency. December 11, 2015
[3] Guideline § 15064(g). *Sierra Club v. CDF* (2007) 150 Cal. App. 4th 370.

environmental impact."[4] The "fair argument" test establishes a low threshold for initial preparation of an EIR, which reflects a preference for resolving doubts in favor of environmental review." Evidence supporting a fair argument of a significant environmental impact will trigger an EIR even if the record contains contrary evidence. It is a question of law, not fact, whether a fair argument exists, and courts owe no deference to a lead agency's determiniation. There is a clear preference for resolving doubts in favor of preparing an EIR.[5]

Fine LAC 6

Courts often refer to the EIR as "the heart" of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts.6 Based on the objective analyses in the EIR, CEQA requires public agencies to deny approval of a project with significant adverse impacts when there are feasible alternatives or motigation measures that can substantially lesson such efforts.7

The California Office of Historic Preservation has also concluded that there is a direct adverse effect on St. John's Cathedral as well as potential indirect impacts on other nearby historic resources. This finding was made as part of the Section 106 process. The Conservancy concurs and does not believe mitigation or a Memorandum of Agreement (MOA), as suggested by Caltrans, can adequately address or minimize the impacts of a proposed fifty-four-foot-high flyover structure.

Fine LAC 7

Further, based on initial discussions with Caltrans we are concerned about how it is approaching impacts to date and defining appropriate mitigation. A series of landscape renderings developed by Caltrans in ealy 2016 indicate a basic lack of understanding of the Secretary of the Interior's Standards for Rehabilitation. The renderings call for highlighting and drawing attention to the proposed flyover structure rather than minimizing its impact. These mitigations, as defined by Caltrans, have no direct nexus with the impact and do not and cannot minimize the extreme visual intrusion and large physical barrier and damage to an historic setting caused by the project as proposed. It effectively will further and irrepairaly split this neighborhood. We firmly believe no amout of mitigation can reduce the impacts of the proposed project to a level of "less than significant."

Fine LAC 8

[4] No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 75 (emphasis added)l see also Architectural Heritage Association v. County of Monterey (2204) 122 Cal.App.4th 1095. "Sunstantial evidence" includes "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Inaccurate information and unsubstantiated opinion are not substantial evidence. PRC §21082.2©; Guidelines §15384.

[5] Architectural Heritage Association v. County of Monterey (2004) 122 Cal. App. 4th 1095, 1110.

[6] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

[7] *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d30,41 (italics added)

The MND Provides No Evidentiary Support of Insignificant Impacts to Historic Resources

Caltrans' failure to properly identify, evaluate,and study impacts is a violation of CEQA. The purpose of an initial study is to provide a lead agency with adequate information regarding a proposed project to determine the appropriate level of environmental review and "documentation of the factual basis for the finding in a negative declaration that a project will not have a significant effect on the environment."[8] Where an agency...fails to gather information and undertake an adequate environmental analysis in its initial study, a negative declaration is inappropriate."[9] Failure to adequately analyze all of a project's potentially significant impacts or provide evidence to support conclusions reached in the initial study is a failure to comply with the law. Instead Caltrans has chosen to dismis and disregard expert and community opinions.

Fine LAC 9

Conclusion

The Conservancy continues to question the purpose and need for the proposed project, as well as the wisdom of pursueing a flyover structure in light of other alternatives that may well result in better transportation and community outcomes. The project as proposed is a very dated approach to transportation planning that has been demonstrated time and again to fail. The perceived benefits by Caltrans do not outweigh the significant adverse impacts, producing yet another physical barrior and scar on the community. For the purposes of this letter and comments on the Draft Initial Study, the Conservancy strongly urges Caltrans to take a step back and develop an Environmental Impact Report in light of the very serious consequences and impacts to historic resources that would result from the project as proposed.

Fine LAC 10

About the Los Angeles Conservancy:
The Conservancy is the largest local historic preservation organization in the United States, with over 6,500 members. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through direct advocacy and education.

Fine LAC 11

Thank you for your consideration of these comments. Please contact me at afine@laconservancy.org or 213-430-4203 should you have any questions.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

[8] *Ctr. For Sierra Nevada Conservation v. County of El Dorado* (2012) 201 Cal. App. 4th 1156, 1170

[9] *Ctr. For Sierra Nevada Conservation v. County of El Dorado* (2004) 122 Cal. App. 4th 1591, 1597

Fine LAC 1: Section 4(f) protection, it is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Fine LAC 2: Commenter's concerns are noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Feasible alternatives were considered in sections 1.5 and 1.6 of the environmental document.

Fine LAC 3: The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Fine LAC 4: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Fine LAC 5: Commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 in the environmental document for further details.

As far as construction vibration effects are concerned, based on construction standards in the Caltrans (2013) Transportation and Construction Vibration Guidance Manual, the probability of exceeding architectural damage risk amplitudes for continuous vibrations (such as excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment) from construction is very low, and from freeway traffic is practically non-existent.

However, if vibration concerns involve pavement breaking, extensive pile driving, or trains, 25 feet (7.5 meters) or less from normal residences, buildings, or unreinforced structures, damage is a real possibility. This may also be true if these operations occur within 50–100 feet (15–30 meters) from historic buildings, buildings in poor condition, or buildings previously damaged in earthquakes. In any case, extreme care must be taken when sustained pile driving occurs within 25 feet (7.5 meters) of any building, and 50–100 feet (15– 30 meters) of a historic building, or a building in poor condition. Although, the exact method of constructing the concrete column supports/bents has not been identified at this stage of the design process, Caltrans is only considering the use of vibration reduction construction methods, such as Cast-In-Place Concrete Piles or Jetting, for Alternative 2 (Proposed Build Alternative).

Additionally, construction-related ground disturbance in the immediate vicinity of St. John's Episcopal Church will occur between 160–230 feet from the east side of the St. John's Episcopal Church building. Therefore, no vibration effects to St. John's Episcopal Church building are anticipated. Although there is sufficient distance between the construction site and sensitive receptors, avoidance and minimization measures (summarized in Table 1 of the environmental document) will be implemented during the construction period in order to ensure that ground vibration is kept to a minimum.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Therefore, Section 4(f) protection, it is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Fine LAC 6: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Feasible alternatives were considered in sections 1.5 and 1.6 of the environmental document.

Fine LAC 7: The commenter's opinion is noted. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

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An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Fine LAC 8: The commenter's opinion is noted. Renderings have been updated/re-designed to minimize any potential impacts of the structure. Refer to Figure 21 of the environmental document for updated preliminary renderings.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Fine LAC 9: The commenter's opinion is noted. Caltrans has properly identified, evaluated, and studied potential impacts as a result of the proposed Build Alternative. The topics that have been evaluated in the Draft IS/EA are:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)
- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography

- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Further, Table 1 of the environmental document provides a summary of potential impacts as well as avoidance, minimization and/or mitigation measures that will be implemented to minimize any potential impacts that may result from the proposed Build Alternative.

Appendix G of the environmental document provides a list of technical studies and references used to support the findings summarized in the environmental document. Technical studies are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

The remainder of the comment is considered the commenter's opinion and does not require further response.

Fine LAC 10: The commenter's opinion is noted. This comment is considered the commenter's opinion and does not require a response.

Fine LAC 11: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

St. John's
CATHEDRAL

514 West Adams Boulevard, Los Angeles, CA 90007 • 213.747.6285 • *www.stjohnsla.org*

May 18, 2016

Mr. Garrett Damrath, Chief Environmental Planner
Division of Environmental Planning, Caltrans District 7
I-110 High-Occupancy Toll Lane Flyover Project
100 South Main Street, MS 16A
Los Angeles, CA 90012

RE: Public comment on 100-Flyover Draft Initial Study/Environmental Assessment (IS/EA) and Notice of Intent to Adopt Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI)

The Flyover project has achieved a certain momentum based on an understandable wish to complete the studies that have been funded. It is easy to march forward one-by-one ticking off the necessary boxes that show that all of the legally-required concerns have been analyzed. However, for a project this costly that presents such a massive physical intrusion on a heritage neighborhood, we are all obligated to circle back to the initial problem statement to see if the ensuing impacts are, in fact, justified environmentally, urbanistically, and emotionally. What is the opportunity cost to the state and the city to allow more cars off the freeway and onto sensitive surface streets? St. John's 1

In the June, 2012 the *PROJECT STUDY REPORT – PROJECT DEVELOPMENT SUPPORT (PSR-PDS) To Request Approval of Locally Funded Project to Proceed Project Approval and Environmental Document Phase* was submitted by Kathleen McCune, Metro Transportation Planning Manager. This report established the background for the Flyover project and the rationale for its development. The report reveals contradictory aims as well as a clear lack of understanding of the impacts its implementation will have on the city. There is no question that traffic service levels are poor at Adams and Flower, but the promise that this Flyover will solve them is questionable at best and the costs of being wrong are enormous. St. John's 2

The HOT lane experiment added pressure on city streets: The goal of the Flyover is to alleviate congestion from traffic exiting the HOV lanes. An experimental conversion from HOV lanes to HOT lanes was implemented increasing utilization and therefore the output of additional vehicles onto local streets. The report states, "In the Fall of 2012, the I-110 HOV lanes will be converted to High Occupancy Toll (HOT) Lanes for a one-year Congestion Reduction Demonstration Program (CRDP). If the one-year demonstration program is successful, the HOT lanes will continue to operate on the I-110….The St. John's 3

primary goal of the CRDP conversion of the HOV lanes to HOT lanes is to maximize the efficiency of the existing freeway system." St. John's 3

City streets and neighborhoods are being negatively impacted to solve congestion problems created by an experimental program that was created to improve functionality of the freeways. It was not created to improve the performance of surface streets. The judgment that the HOT lanes were "successful" was clearly based on a set of criteria that apply to the highways and not surface streets. St. John's 4

Increased capacity does not reduce delays: The now well-understood transportation paradox is that if capacity is increased to accommodate more cars it does not follow that travel times improve. This is particularly true with this project. If highway capacity is increased, more drivers will continue to use the freeway maintaining current slow travel times (which are already psychologically acceptable) but more cars will then exit onto surface streets. This statement in the Study Report reveals this dilemma perfectly: "The purpose of this project is to alleviate the congestion and reduce the queuing and delay on HOV lanes and HOV off-ramp at Adams Blvd… Increasing capacity at this location is a key to ensuring the HOV lanes can manage delay and serve additional users and reduce the delays." Increasing capacity is mutually exclusive with reducing delays. Further, **while capacity can be increased on the highways, there are practically no solutions to increasing capacity on surface streets** barring more street widening. Exacerbating the phenomenon, the 'road diet' that Figueroa Street will undergo shifts the bottleneck from Adams to Figueroa. St. John's 5

The project is in clear conflict with the multi-modal goals of MyFigueroa: Metro is not the lead agency on this phase of study, but is widely expected to be the construction funder. They take pride in being forward looking, caring about solving "the last mile" and encouraging multi-modal solutions in their work. MyFigueroa will be LA's first "complete street" with dedicated bike lanes and enhanced pedestrian amenities to complement the many mass transit alternatives serving the area. The report states, "LADOT proposes a Bike Lane improvement project on both directions of Figueroa Street. The bike lane (adjacent to existing curb) on NB Figueroa Street would result in a conflict when HOV traffic merges onto it." St. John's 6

The "No Build Alternative" was eliminated as "inconsistent with the HOT lanes concept, which is to improve mobility." This is a very narrow (and antiquated) view of mobility that really just means it's easier to travel by car. True mobility - as Metro now embraces - means getting people around by car, on mass transit, by bike and on foot. **The Flyover project conflicts with bike traffic, degrades the pedestrian experience, and negatively impacts surface street service and is itself inconsistent with stated goals to improve mobility.** St. John's 7

Freeways are widely acknowledged to divide urban neighborhoods: Internal Caltrans correspondence indicates that the "loud" opponents are locally based and therefore not significant enough to qualify this project as "complex" and deserving of further study. Public noticing of the project has been very local so it is no surprise that a larger contingent has not levelled objections. That said, it is time to point out that there is a St. John's 8

global trend to demolishing freeways in urban areas in order to stitch back together cities that have been cleaved. The University Park neighborhood is a vulnerable area populated by an ideally diverse group of ages, ethnicities, and occupations. Renderings for the Flyover show that the tenuous connection from Figueroa to the east side of downtown will be psychologically and visually severed by the magnitude and height of this massive structure rising to nearly 80 feet above Adams. The length at 1400 feet makes it a veritable wall. Dividing parts of this community is wrong from both a planning and a social perspective. St. John's 8

This story by John Norquist, former President of the Congress for the New Urbanism and former Mayor of the City of Milwaukee, should serve as inspiration to halt this Flyover:

> *"When New York's West Side Highway was closed in 1973, 53 percent of the traffic that had used this highway disappeared, dramatic proof that building freeways generates traffic and that removing freeways reduces traffic. Yet there was tremendous pressure to replace this highway with a bigger and better freeway named Westway.* St. John's 9
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> *The plan was defeated after a struggle that lasted for more than a decade. Now, there is a park, pedestrian promenade, and bicycle path along the Hudson River on Manhattan's west side - public places that are real amenities for Manhattan on land that used to be blighted by an elevated freeway."*

Although Caltrans' is the freeway agency, its partner, Metro, has a stated goal to "Provide leadership for the region's mobility agenda." **Los Angeles and California should not be doubling down on car dependence, they should be leading the way to multi-modal transit.** The following cities have successfully demolished their urban freeways and more destruction is on the boards: Harbor Drive, Portland, OR; Embarcadero Freeway, San Francisco, CA; Central Freeway San Francisco, CA; Park East Freeway, Milwaukee, WI; Gardiner Expressway, Toronto, Ontario; West Side Highway, New York, NY; Robert Moses Parkway, Niagara Falls, NY; Pompidou Expressway, Paris, France; Cheonggye Freeway, Seoul, South Korea. City and state governments as well as citizen groups all over the world are supporting the demolition of dozens of urban freeways. **Los Angeles and California have the chance to avoid the mistakes of the 1970s by not building this now.** St. John's 10

Environmental justice populations deserve better: The statements from the Report addressing the aesthetic impacts acknowledge the sensitivity of the area and dismiss visual impacts essentially because the neighborhood is already unattractive, in essence, asking the question: How much worse could the Flyover make it? The Report derides local aesthetics: "Given the urbanized area and lack of scenic resources in the project area, the extension of the HOV roadway would not adversely impact the visual resources within the project area." The residents of the community and users of the Figueroa corridor disagree. In any, case, **this Flyover will absolutely preclude future efforts to beautify the area**. The report goes on to state, "Previous studies in the area have indicated the presence of environmental justice populations, and so the potential for impacts does exist ... much of the work will be done within the prism of the roadway. St. John's 11

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Moreover, the existing mainline in this area is depressed, and coupled with the existing visual character of the area, the addition of an elevated structure is not expected to result in a significant visual impact to environmental justice populations." St. John's 11

The Flyover directly impacts a concentrated collection of historic, well-maintained intact landmarks and threatens the private neighborhood investment in property that would naturally follow from the MyFigueroa infrastructure. The 2015 Visual Impact Assessment by landscape architect George Olguin states "The visual quality of the existing corridor will not be affected by the proposed project." **There is no architectural or landscape treatment that can mitigate the size, height and character of this structure. 'No visual impact' is an erroneous finding.** St. John's 12

The Flyover negatively affects a large inventory of historic properties: This topic has been very well covered by the LA Conservancy and West Adams Heritage Association, but by far the biggest impact will be on St. John's. Caltrans took a large portion of our land on the east end of the parcel to reroute Flower Street to accommodate construction of the new 110 freeway for which no environmental assessment was St. John's 13

done. This freeway has severly damaged the acoustics of the sanctuary and made outdoor events such as weddings all but impossible. St. John's is well-known for the quality of its musical programming and the beauty of its services. The 2016 Environmental Assessment report finds no impact from noise stating that it will be similar to existing as if 'existing' was acceptable. Now, the freeway noise is buffered by the trench, the Flyover will offer no protection whatsoever from traffic noise infiltrating the sanctuary. So, **in addition to the visual effront of the structure, it also will assault the ears in a space intended for worship and contemplation.** St. John's 14

In summary, we oppose the Flyover based on the faulty conceptual ground work the agency itself set forth in its 2012 concept study:

- The Flyover responds to an increase in highway capacity but will not alleviate overcrowding on surface streets.
- The Flyover will not reduce delays but merely shift the location of the bottleneck.
- The Flyover conflicts with traffic patterns of the MyFigueroa project and agency goals to work toward a multi-modal transit future in downtown LA.
- The Flyover exacerbates the community division created by the existing freeway trench and conflicts with stated Metro goals to pursue "sustainability, safety, innovation and transit leadership."
- The findings dismiss outright the impacts on economic justice populations.
- The finding of no visual impact is erroneous
- The Flyover will intrude acoustically on the comtemplative space of the St. John's sanctuary

St. John's 15

In order for the Flyover project to advance we request a full EIR be prepared taking into consideration the following:

- A traffic analysis detailing the quanity of traffic directed onto Figueroa Street and the consequences of conflicts with anticipated increase in bicycles and pedestrians
- A study of the social and economic impacts associated with the addition and removal of urban freeways

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- A historic structures report for the Cathedral and Parish Hall
- A preservation master plan for both structures
- Actual measurement of sound levels and a study of possible sound attenuation measures against existing and new noise generation
- A serious visual anaysis that goes beyond renderings and includes aesthetic alternatives

St. John's 16

We acknowledge that there are serious traffic problems in the immediate area. Ideally, instead of being asked to choose between this proposal and a 'No Build' alternative, we would be presented with a more nuanced solution that would be arrived at through a collaborative aproach of State and local agencies.

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Thank you for the opportunity to provide input after the public information session and the materials you provided in response to the Public Records request. Given the studies to date and a review of the various agencies' reports and correspondence, we believe the No Build Alternative is the correct choice. Further study is required and a close look at the costs, benefits and ultimately the value of an enormous expenditure on an antiquated approach to urban mobility.

St. John's 18

Respectfully,

The Very Rev. Canon Daniel Ade

The Very Rev. Canon Mark Kowalewski

Deans and Rectors, St. John's Cathedral

Ron Kosinski, Deputy District Director, Caltrans
Kelly Ewing-Toledo, Heritage Resources Coordinator, Caltrans
Los Angeles Department of Transportation
Assemblyman Reggie Jones-Sawyer
Los Angeles Mayor Eric Garcetti
Councilmember Curren Price, CD9
Office of Historic Resources, City of Los Angeles
Office of Historic Preservation, State of California
California Preservation Foundation
Los Angeles Conservancy
West Adams Heritage Association
Sally Moawad, Caltrans

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St. John's 1: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

St. John's 2: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

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St. John's 3: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

St. John's 4: This project is not part of any experimental program. The main purpose of the proposed structure will allow motorists to bypass the existing bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street. Therefore, the proposed ramp will significantly decrease the traffic congestion at the analyzed intersections of Adams Blvd. at the off-ramp/Flower Street/Figueroa Street by diverting the HOT off-ramp traffic to access directly northbound Figueroa Street via Figueroa Way. Refer to Tables 18 through 21 of the environmental document for am/pm peak hour Level of Service (LOS).

St. John's 5: The commenter's opinion is noted. With or without the proposed project, the travel demand on northbound Figueroa Street and adjacent streets will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly to Figueroa Street via Figueroa Way.

Caltrans Traffic Investigations Unit concurs that enhancing capacity or in this case eliminating the existing bottleneck will often induce DMT's by encouraging drivers to use the new facility. However, adding capacity also enhances Level of Service (LOS) and improve traffic flow, thus, reducing traffic delay, improving air quality, and improving accident rates. In the Traffic Study, Caltrans has considered a 20% increase in traffic for future analysis, even though, MyFig project will discourage some motorists to use the proposed ramp onto Figueroa Street. MyFig Project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

St. John's 6: The Project Development Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will compliment MyFig Project. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

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Enhancing traffic flow will encourage drivers to use the new facility. In the Traffic Study, Caltrans considered a 20% increase in traffic for future analysis, even though, MyFig Project will discourage some motorists from using the proposed ramp to access Figueroa Street. MyFig project will decrease existing travel lane capacity on Figueroa Street from three to two lanes by converting an existing vehicle travel lane to cyclist only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a “STOP” controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

The Metro Silver Line bus stop on Figueroa Way will be consolidated with the currently existing bus stop on Figueroa Street and 23rd Street, which is approximately 0.2 miles away from the current location. Therefore, bus service will still be available.

Figueroa Way will be re-designed as a pedestrian and bicycle corridor, which will make it less likely to become a homeless encampment (see Figure 21 of the environmental document). The re-design may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community. Therefore, permanent impacts to pedestrians and bicyclists are not anticipated as a result of the proposed Build Alternative. Therefore, the proposed Build Alternative will not be in conflict with the multi-modal goals of MyFig Project.

St. John's 7: The commenter's opinion is noted. The commenter has not provided any evidence to show that the flyover project conflicts with bike traffic, degrades the pedestrian experience, and negatively impacts surface street service. This comment is considered the opinion of the commenter and does not require a response.

The Project Development Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will complement MyFig Project. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay and improving accident rates at this location. Enhancing traffic flow at this location will encourage drivers to use the new facility. In the Traffic Study, Caltrans considered a 20% increase in traffic for future analysis, even though, MyFig project will discourage some motorists from using the proposed ramp to access Figueroa Street. MyFig project will decrease existing travel lane capacity on Figueroa Street from three to two lanes by converting an existing vehicle travel lane to cyclist only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

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The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

St. John’s 8: The commenter’s opinion is noted. A Preliminary Environmental Analysis Report (PEAR) was prepared, which dictated the next level of documentation necessary. The PEAR provided the initial environmental evaluation of the project and alternatives. Based on the potential impacts identified, an Initial Study/Environmental Assessment has been prepared. The determination of whether a project is complex is determined by the potential impacts and concurrence is required by Caltrans Headquarters Environmental Coordinator.

According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons.

The highest point of the structure at street level will be approximately 55 feet not 80 feet. The remainder of this comment is considered the opinion of the commenter and does not require further response.

St. John's 9: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

St. John's 10: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

St. John's 11: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the Project Study Area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

St. John's 12: This comment is considered the commenter's opinion and does not require a response.

St. John's 13: The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section

2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for further details.

St. John's 14: The commenter's opinion is noted. This comment is considered the opinion of the commenter and does not require a response.

St. John's 15: The commenter's opposition to the project is noted as well as the summary of why the commenter opposes the project.

St. John's 16: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence.

Traffic analysis has been conducted for different alternatives. The proposed Build Alternative is the most feasible analyzed alternative. The Traffic Study Report is available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

- The Community Impact Report (August 2015), discusses social and economic impacts as a result of the proposed Build Alternative. The removal of urban freeways does not meet the purpose and need of the project, therefore, it will not be studied.
- A historic structures report for the Cathedral and Parish Hall can be considered when approving the Memorandum of Agreement for the project.
- A preservation master plan for the Cathedral and Parish Hall can be considered when approving the Memorandum of Agreement for the project.
- Actual noise level measurements have been completed. Refer to section 2.2.5 of the environmental document.
- A visual assessment has been completed and the findings can be found in section 2.1.9 of the environmental document.

St. John's 17: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

St. John's 18: The commenter's support for the No Build Alternative is noted.

Roland Souza
Preservation Restoration Specialist

WAHA Comment Letter on Caltrans I-110 High Occupancy Flyover IS/MND

May 18, 2016

Ronald Kosinski
Deputy District Director
Garrett Damrath
Office Chief, Division of Environmental Planning
California Department of Transportation
100 S. Main Street, Suite 100 MS16A
Los Angeles, CA 90012

Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration/Environmental Assessment; SCH No. 2013021002

Dear Mr. Kosinski and Mr. Damrath:

The neighborhood around the Adams and Figueroa intersection and the 23rd Street and Figueroa intersection to the north has an incredible array of historic landmarks, Victorian and early 20th century structures. These landmarks from the 1890s thru the 1920s dramatically show the development and transformation of Los Angeles into one of America's major cities. They have survived despite many of the assaults of the mid 20th century as a visible reminder of the elegance of this period in L A's history and continue to be rediscovered and valued by the residents of the city today. As a person lucky enough to own a home in this neighborhood, I feel an obligation to raise questions about any projects that might threaten the integrity of the neighborhood.

Tonight I took a walk around these streets that mean so much to me and tried to imagine how an elevated highway ramp from Adams to 23rd St would impact my neighborhood. I started at the 1923 Romanesque St John's Cathedral 150 feet from the south east corner of the proposed Flyover. I recalled the magical evening I spent there some Christmases back listening to the Gay Men's Chorus there and wonder how different the experience would have been if cars, trucks and buses had been speeding down the proposed ramp. Two buildings to the west, the Auto Club of So California, a Spanish Colonial Revival building also built in 1923 would also be negatively impacted by the noise and visual blight of the huge concrete ramp if this proposed project is approved. On the north side of this intersection of Adams and Figueroa is the Spanish Churrigueresque St Vincent De Paul Roman Catholic Church. This landmark would certainly also be negatively impacted by the construction of this dividing barrier. Souza 1

The lot north of the church is a parking lot used by Mount St Mary's staff and students. The parcel north contains the Stimson House, built in 1891 by Carrol and Brown, and one of the most expensive homes built in LA during the 1890s. This huge sandstone Richardson Romanesque Revival known as the Stimson Souza 2

Castle was one of the earliest LA City Historic Cultural Monuments. Sadly after standing proudly on Figueroa for 125 years, this mansion , if the ramp were to be built, would be directly facing this concrete wall forevermore dividing it from the east side of Figueroa. Souza 2

Finally this off ramp would descend into the intersection of Figueroa and 23rd in front of the Historic New Directions School campus, terminating at the same location where parents drop off their children. It seems like when this traffic comes to the end of the proposed flyway it either would have a choice to go east on 23rd to Figueroa or west on 23rd St to Hoover and/ or continue on 23rd to Vermont Ave. Travelling from the terminus of the flyway west on 23rd {an extremely narrow street with many driveways} you immediately pass a number of important historic landmarks including the 1904 Severance House at 650 W 23rd and 7 historic Landmarks in Chester Place and 2 more In St James Park. These houses were the first" Millionaires' Row" which are now a part of Mount Saint Mary's Doheny campus located between 23rd and Adams Blvd. This landmark collection of buildings would also be negatively impacted by this increase in traffic on an already overburdened street. On the north side of 23rd St the street scape consists of more restored turn of the century homes and, student apartments ending at Estrella where another school, the Star Christian School child care center and Ministerios Manantial school are located. Parents dropping off children at these locations for school would most likely be dropping their children off at the same time on the same block that rush hour traffic would be coming off the HOV Flyover ramp creating many potentially dangerous situations. Souza 3

I think that the proposed Flyover would create many traffic problems around its 23rd St terminus and negatively impact the historic fabric of the many landmarks suddenly facing the side of the proposed Flyover. This is a small compact area with a large cluster of historic Landmarks and districts that would be severely impacted by this plan .For all of these reasons this version of the plan should be reassessed and a plan that would does less environmental harm to the community explored. Souza 4

Thank You

Roland Souza
West Adams Heritage Association Board Member
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LA, CA 90006
Roland.e.souza@gmail.com

Souza 1: The commenter's opinion is noted. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916

S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for further details.

According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

Souza 2: The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the proposed project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Commenter has not provided evidence to support the statement that the structure would divide the community.

Souza 3: The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated as the commenter suggests. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

Souza 4: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

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MITZI MARCH MOGUL
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May 18, 2016

Ronald Kosinski
Deputy District Director
Garrett Damrath
Office Chief, Division of Environmental Planning
California Department of Transportation
100 S. Main Street, Suite 100 MS16A
Los Angeles, CA 90012

Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration/Environmental Assessment; SCH No. 2013021002

Dear Mr. Kosinski and Mr. Damrath,

I have been asked by the Preservation Committee of West Adams Heritage Association (WAHA) to provide comment on the "Flyover" project proposed by CalTrans for the area between the Adams Blvd off-ramp to the Figueroa/23rd Street exit of the 110 Freeway, a distance of approximately 2 blocks. West Adams Heritage Association is comprised of over 350 households in the West Adams/University Park area, which includes the project site. WAHA routinely comments on land use applications and environmental documents on behalf of the Association members. Professionally, I am a Historic Preservation Consultant with 30 years experience and have worked for a number of organizations including the Prince of Wales Foundation for Architecture and the Los Angeles Cultural Affairs Department. My local preservation consulting projects include the Max Factor Building, Dominguez Wilshire Building, Desmond's Building, Oviatt Building and Mel's Drive In, to name a few.

I have reviewed the proposed plan as well as comments made by CalTrans which assert the project's low impact on adjacent historic resources. Their conclusions can only be reached by someone who wants something so badly that he is unwilling to actually look at the facts. There is no room for interpretation here. This massive construction goes far beyond being an encroachment on historic resources; it is an invasion of the community. The two HOT/HOV lanes will rise up to 54 feet above the current street level, pushing the traffic two blocks further north /northwest at Figueroa and 23rd Street. This massive structure would dominate and overpower the area, dwarfing everything for miles around. This concrete monster invasion will be dangerous as well, with the possibility of structural failure in an earthquake and creating an attractive nuisance inviting the mentally unstable to use it for suicide attempts. It will also have a negative environmental effect, as the concrete absorbs and then discharges intense heat to the surrounding businesses, homes, institutions, and landscaping. Concerns about the on-going drought conditions and the effects of such construction on the climate should be sufficient reason not to build it.

Mogul (WAHA) 1

Following construction, the non-HOT/HOV lanes will continue to exit at Adams Boulevard, but will no longer be able to use the Figueroa Way cut off to 23rd and Figueroa because that will be

Mogul (WAHA) 2

closed. Traffic will be forced to go to Adams Boulevard if they are traveling west. Funneling all westbound traffic to one intersection will create a back up of cars onto the freeway as they wait to exit; it will also multiply exponentially the traffic on Adams Boulevard, overburdening an already busy street. Further, the proposed construction is designed to accommodate only those cars traveling in the toll lane. Spending $54,000,000 to move traffic two blocks for a small, privileged class is antithetical not only to democratic principles, but to economic responsibility. Infrastructure projects such as roads are supposed to be amenities which improve life for all people, not come at the expense of some in favor of others.

Mogul (WAHA) 2

In addition to the noise, dirt, pollution, and traffic of construction itself, the daily fallout of the aforementioned conditions will be catastrophic. Within several to a few hundred feet are a number of historic structures, officially recognized as such by City, State, and Federal designations. Attaining such status requires that they possess a number of qualifications in order to meet the threshold standards set by each government agency. The fact that so many structures have qualified in such proximity to each other speaks to the historic character of the entire neighborhood.

Mogul (WAHA) 3

CalTrans has failed to identify all of the historic resources or recognize the qualifications of each of them and properly assess them. Section 106 of the National Historic Preservation Act states that when two experts disagree on such matters, the more conservative opinion prevails and an Environmental Impact Report (EIR) is required to be performed by an independent consultant. Further, California Environmental Quality Act (CEQA) is very clear on the handling of significant cumulative effects that cannot be mitigated. The "Flyover" presents one of the most cumulatively considerable damaging impacts to historic resources in many a year.

Mogul (WAHA) 4

The Zanja (c.1880), the Stimson Residence (1891), Chester Place/Mount St. Mary's Campus (1895), the Slauson House (c.1900), the Automobile Club of Southern California (1921), St. Vincent de Paul Cathedral (1923), St. John's Cathedral (1924), as well as a number of private homes will all be negatively impacted by the proposed flyover. These resources that would be impacted have proven themselves to be of cultural significance.

Mogul (WAHA) 5

Of the aforementioned, two are houses of worship. The tranquility of the religious institutions will be compromised beyond any proposed mitigation. Despite city life they have managed to maintain a serene atmosphere, which would be forever despoiled by the proposed project.

The Stimson Residence serves as a nunnery; the damage to the residents there is incalculable; it would forever disturb the peace of those women of God, compromising not only their peace but their safety as well.

The educational facility will be disrupted when its students are unable to concentrate or perhaps even hear their instructors over the din of construction and the discord of traffic as a constant accompaniment. Similarly, the Slauson House is a school for primary age children. Their educational experience would also be impacted. In recent years there has been recognition that proximity to freeways, airports, and other types of industrial works is detrimental to children's health and affects their ability to learn. CalTrans seems to be the only public agency to disregard these known issues.

Mogul (WAHA) 6

The Automobile Club houses a historical archive in addition to it offices and service center. Again, the pollution would negatively affect the artifacts as well as the many people who utilize the services offered and the traffic compounded. The Zanja is the last remaining above-ground, *in situ* remnant of a system which was largely responsible for the development of the city.

Mogul (WAHA) 7

Despite being approximately 136 years old it is still extant and is an important artifact of the city's history. With a concrete mass looming above it, the Zanja would lose its context as a water delivery system.

Mogul (WAHA) 7

The negative impacts of the "flyover" on historic resources cannot be overstated. The relationship between historic resources and their context is crucial as is the relationship between the resources themselves. Each resource communicates not only its own history but in conjunction with the others, tells a broader story of patterns of urban development, architectural, engineering, and industrial design, and the expansion of civic infrastructure which facilitated the growth of the city. These historic structures are three-dimensional artifacts which have managed to withstand the pressures of modern life. As part of a streetscape they are able to provide a tangible narrative that no history book can. The "flyover" would intrude on the continuity of what is actually a historic streetscape and irrevocably alter that streetscape in the same way that the construction of the Santa Monica/10 Freeway altered the community of West Adams by cutting communities in half. There will be no way to reconcile the historic context with the encroachment of traffic, noise, and concrete.

Mogul (WAHA) 8

It has taken many years and significant effort by a wide consortium of individuals and organizations to improve the neighborhood after years of neglect by City officials. Significant financial investment has helped to re-establish the reputation of the area; the proposed project will destroy that progress and condemn the community to a future of economic and social corrosion. The many historic homes in the area would suffer a loss in value causing economic disaster to many; the intensity of traffic and noise will create an atmosphere conducive to crime, and reinforce a negative perception of the area.

Mogul (WAHA) 9

Even California EPA Air Resources Board lists half a dozen different studies which explore the adverse health outcomes of exposure to air pollution. A Tufts University study, led by Doug Brugge, Professor of Public Health and Community Medicine, Tufts University School of Medicine (The author is also a member of the Scholars Strategy Network), is one of many which researched the effects of air pollution and concluded with empirical evidence that such proximity of exhaust pollution is harmful to individuals. The study, entitled *"New Research on the Risk of Breathing Polluted Air from Freeways and High-Traffic Areas"* was performed in 2013 and concluded:

"What people cannot see can be very harmful. In 2012, a report on the Global Burden of Disease found that pollution from dangerous tiny particles and droplets in the air — what scientists call "fine particulate matter" — is among the leading causes of death and severe disability. According to estimates in this report, over 3.2 million deaths per year may be attributable to people breathing dangerous particles in their general environment, and another 3.6 million deaths happen because of polluted air attributed to burning solid fuels for heating or cooking in developing countries. To put the danger in perspective: the total deaths from particulate air pollution are greater than 6.3 million deaths each year from tobacco use."

Mogul (WAHA) 10

"The bad health news about dangerous particles in the air is not confined to fine particulate matter which is spread broadly across metropolitan regions, however. I direct a study called the Community Assessment of Freeway Exposure and Health that looks at air pollution from even tinier particles – "ultrafine particles" – that are concentrated next to freeways and other places with a lot of motor vehicle traffic. Pockets of this kind of invisible, odorless and often overlooked air pollution may be especially dangerous for people to live and work next to busy highways. My research group is developing innovative ways to assess the hazard and protect people from exposure to health risks."

"Many people suppose that respiratory diseases are the main risk from breathing in polluted air, but in fact the major health risks are from cardiovascular diseases. Breathing in fine particles from vehicle emissions, power plants, or burning fuels causes inflammation that spreads throughout the body in the blood, contributing to hardening of the arteries and increased risks for heart attacks and strokes."

"Most research on particle pollution in the air has so far focused on fine particles in the surrounding air. This kind of pollution is not spread evenly around the world. Very high pollution levels in China and India, for example, result in approximately two million deaths a year from exposure to fine particles. But even in countries like the United States, where pollution levels have been regulated for decades and skies are usually relatively clear, there is still a surprisingly high level of deaths from breathing dangerous fine particles. Estimates vary, but somewhere between 100,000 and 200,000 deaths per year are attributable to dangerous fine particles spewed into the air, primarily from power plants and motor vehicles.

Measurements of the health effects of ultrafine particles are less well developed — and that is what my research colleagues and I are tackling. Conventional fine particle air pollution tends to be spread evenly over wide areas — such as whole cities — but ultrafine particle pollution can be high in small, local areas, next to a highway or major roadway, for example. Pollution concentrations can move around and go up and down rapidly. Researchers have not looked as much at ultrafine particle air pollution in part because the fast-changing levels make it hard to pin down exactly how much people are exposed to.

Researchers often do tests on animals to see how dangerous various kinds of pollution might be for people, and ultrafine particles in the air turn out to be more toxic in animal studies than similar concentrations of fine particles. Investigations looking at people have found that when ultrafine particle pollution levels go up and down, measures of health problems also rise and fall in the weeks that follow. Particularly worrisome, people who live very close to heavy traffic and get exposed to high levels of ultrafine particle pollution also have more health problems, including heart and vascular problems, according to available studies. Air monitoring has repeatedly shown ultrafine particles are elevated next to highways and major roadways, but researchers are still working to fully connect the dots between ultrafine exposure and its health effects in people.

Mogul (WAHA)10

In the Community Assessment of Freeway Exposure and Health study, my colleagues and I are measuring exposure to ultrafine particles in the air for people living at various distances from a highway and testing for health risks. Our full findings are not yet ready to report, but we have published some early papers that demonstrate both elevated ultrafine particle levels and higher disease risks for people who live closer to highways. We expect to be able to give more precise estimates of degrees of exposure and health risks in the near future."

Addressing the Highway Air Pollution Problem

Over the past half century, air in many parts of the United States has gone from sometimes looking cloudy and soot-filled, much like the air over much of China today, to clearer skies. Over many decades, America figured out how to reduce emissions of fine particulate matter from smoke stacks and tail pipes, phasing in increasingly effective pollution-reducing technologies. But we are at earlier stages in developing awareness of the measurable dangers from ultrafine particle pollution — and finding solutions to reduce those dangers.

My research group is actively looking for workable solutions — such as installing various forms of air filtration as a possible way to protect people who live or work next to highways or heavy traffic. Early experiments on public housing units near highways have not achieved the reductions we hoped for, but we are continuing to test ideas. In addition, we are working with municipal agencies, regional planners and design experts to draft local ordinances that might be protective. So far, only California has ordinances that restrict the building of schools next to freeways, and many places might need such rules for parks, public plazas and other community institutions as well.

Mogul (WAHA) 10

The bottom line is that particulate matter in the air — including very tiny and invisible particles in air near highways — is the most important and dangerous environmental health threat. Yet the dangers are insufficiently recognized by the public and policy makers. Better evidence can educate the public and inspire new efforts to tackle serious health risks. We already know that risks from ultrafine air pollution near highways are serious — and they may turn out to be even more worrisome than we know so far. Research can help communities prepare to take action."

This study and many others have independently reached the same conclusions: The association between exposure to air pollutants from freeway traffic and cardiac health in communities near such facilities is clear. The evidence is mounting. Reducing the traffic-related exposures of those living near high traffic roadways should obviously be a priority and not made worse by the very agencies that are supposed to protect citizens. There are many other such studies, which all reach the same conclusions. Why, then, is CalTrans making such an effort to put people and communities at risk? While government representatives from the First Lady on down are trying to encourage healthy habits of eating and exercise, this project will undo what benefits are derived by forcing people to inhale toxic air.

Starting as early as 1958, the State Division of Highways, in concert with other agencies, began proposing a number of freeways throughout Los Angeles. Indeed, they were in a freeway frenzy, proposing 17 different routes. Among these were the Century Freeway, a four-level interchange intended to connect the San Diego Freeway with the future Marina Freeway; The Laurel Canyon Freeway, which would have ostensibly connected LAX to the Valley, cutting through Wilshire Boulevard between La Brea and La Cienega and the Santa Monica Mountains via Laurel Canyon—or possibly Nichols Canyon; the Beverly Hills Freeway, the route for which was either Sunset Boulevard or Santa Monica Boulevard, the latter of which would be a submerged or "cut-and-cover" construction. Pacific Coast Highway was another projected multi-lane freeway which would extend for nearly 100 miles. There was also the Western Freeway, following the avenue of the same name, and the Long Beach extension through South Pasadena. The latter has been successfully opposed despite regular attempts to force it upon the citizenry. The above-mentioned freeway proposals were finally ended in 1973. Among the many objections expressed at the time were concerns about air pollution. Nothing has changed, and in fact, we now know with even greater certainty that air pollution is caused in part by auto emissions and is dangerous to people's health. Even New York City was dismantling its elevated system in the 1960's, realizing the negative effects it had on people.

Mogul (WAHA) 11

Millions of dollars were spent over the years on salaries, studies, and property acquisition. Hundreds of people lost their homes for projects which were never built because their premise was flawed from the outset. Had these things been built, Los Angeles would have been a tangle of concrete and asphalt, with people choking on the fumes being emitted. Haig Ayanian, District Engineer for the State Division of Highways (precursor of CalTrans) was quoted at the time as saying, *"The deletions* (decisions not to build) *are an emotional approach."* That comment sounds like the disappointment of a petty bureaucrat who didn't get to do what he wanted. It was

insulting at the time in the same way that it is insulting now for CalTrans to insist that they know what is best for a community over the objections of the people of that community. There is obviously a history of bad judgment on the part of the agency with regard to these freeway construction matters. There were—and still are—sound reasons to cancel these projects.

Mogul (WAHA) 11

CalTrans has a history of placing freeways in lower socio-economic communities, demonstrating distain for the area and its residents. The above-mentioned freeways were never built because they were planned for affluent areas and residents with financial resources and political savvy were able to effectively prevent them. The previously referenced Santa Monica/10 Freeway was able to be constructed because it was in an area that had suffered years of economic depression and had a population that was inexperienced and unsophisticated in dealing with government agencies and bureaucracies, nor did they have the financial wherewithal to hire professional consultants. Many important historic properties were lost as well as thousands of smaller homes of no less importance to their occupants. Whole streets were swallowed up by the freeway construction and the cohesiveness of the community was destroyed. After that, the rest of the city developed an attitude of "north or south of the freeway," the latter category being a negative one. City services, commercial businesses, insurance companies, other investors, etc all rejected the communities south of the freeway. Even the areas north of the freeway suffered from that same disregard. That unspoken embargo caused untold economic and social difficulties which, over time, became institutionalized and endemic. The ramifications of the Santa Monica/10 Freeway construction are still affecting residents and communities and to this day have not been mitigated or cured. It should also be stated that the Santa Monica Freeway was obsolete the day it opened. It did not improve traffic; it merely shifted it to another location.

Mogul (WAHA) 12

The reasons not to build the "Flyover" greatly outweigh the perceived reasons for its construction. The visual blight, noise, traffic, intrusion into personal space, the imposition on historic resources and their context are problems which cannot be mitigated. Taken individually these issues are problematic; collectively they are insurmountable. Rather than throw good money after bad (for which the taxpayers are footing the bill), it would be advisable on the part of CalTrans to cancel plans for the "Flyover," leave the neighborhood alone, and find more constructive projects which will actually help more people than it will hurt.

Mogul (WAHA) 13

Should you wish to discuss any of my comments with me, my contact information is at the top of this letter.

Sincerely,

Mitzi March Mogul

Mitzi March Mogul

Mogul (WAHA) 1: The commenter's opinion is noted. The highest point of the structure at street level will be approximately 55 feet not 54 feet.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated as the commenter suggests. 23rd Street and adjacent streets are local city streets, City of Los Angeles should be contacted for complaints or concerns.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

An analysis of fault rupture hazard for a particular fault requires that the fault be located exactly, and its potential for rupture to be known, if only approximately. There are no known earthquake faults crossing the project. The closest earthquake fault zone under the auspices of the Alquist-Priolo Earthquake Fault Zoning Act is the Newport-Inglewood Fault Zone, which is located 4.5 miles SW of the project.

Liquefaction may take place if near-surface subsurface materials are loose to medium dense granular and non-plastic soils, submerged in shallow groundwater, and are shaken by an earthquake with sufficient energy. All of these characteristics must be present for liquefaction to potentially occur. Additionally, there is well established guidance for evaluating a site's potential for liquefaction, which has been applied to this project.

The subsurface information obtained for the design of existing bridges near the job site and the recent subsurface exploration performed for the proposed bridge, indicate the subsurface soils at the site are dense to very dense. The liquefaction potential of the site was evaluated using subsurface information and the established technical procedure. The result of the evaluation indicates the site has a low probability of liquefaction.

An individual project does not generate enough GHG emissions to significantly influence global climate change. Caltrans has taken an active role in addressing GHG emission reduction and climate change by creating and implementing the Climate Action Program, which was published in December 2006. One of the main strategies in the Department's Climate Action Program to reduce GHG emissions is to make California's transportation system more efficient. The highest levels of CO2 from mobile sources, such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour. To the extent that a project relieves congestion by enhancing operations and improving travel times in high congestion travel corridors GHG emissions, particularly CO2, may be reduced. Refer to section 2.4 of the environmental document for further details.

The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Mogul (WAHA) 2: The commenter's experience is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

The proposed structure will not be limited to individuals who can afford to use the HOT Lanes only. Buses will be able to use the Flyover to get passengers to their destinations. There are currently 213 transit trips/weekday that travel on the NB I-110 Express Lanes and exit at Adams Blvd. Metro Silver Line ridership has increased from 89,683 trips per month (Northbound only) in November 2012 to 112,102 (Northbound only) per month in November 2015.

Transit Provider	Average Weekday Ridership (Nov 2015, NB only)
Metro Silver Line	4,662
Metro Line 450	577
Gardena Transit	355
LADOT Commuter Express	634
Torrance Transit	107
Orange County Transportation Authority	118
Total	6,453

Further, the proposed structure would bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street. The cost associated with this alternative is approximately $43 million.

The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the Project Study Area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

Mogul (WAHA) 3: With the incorporation of the proper avoidance, minimization, and/or mitigation measures (summarized in Table 1 of the environmental document) and potential construction impacts will be minimized. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Mogul (WAHA) 4: The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House is outside the boundaries of the established project area of Potential Effects as well as the Supplemental APE. No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Impacts on historical resources tend to be site specific and are assessed on a site-by-site basis. Where resources exist, implementation of cumulative development in the region would represent an incremental adverse impact to historical resources. Given the location of the projects listed in Table 33 of the environmental document, cultural resources in close proximity could be adversely affected. Implementation of cumulative development could represent an incremental adverse impact on historic resources. Each related project will be required to comply with the requirements of applicable State and Federal laws to assure that potential impacts are minimized to the fullest extent possible.

The proposed project would result in an adverse impact on two historical property (St. John’s Episcopal Church and St. John’s Parish Hall) within the APE, but with the incorporation the proper mitigation measures this impact is less than significant (refer to section 2.1.10 of the environmental document). Potential construction impacts would be minimized with the incorporation of avoidance measure N-1, minimization measures N-2 through N-4, GV-1, T-1, WQ-1 through WQ-8, and AQ-1 through AQ-16.

Nearby projects would implement similar mitigation measures to minimize impacts on cultural resources. Thus, cumulative impacts from the proposed project would not be substantially adverse. Therefore, the contribution of the project on impacts to cultural resources in the area would not be cumulatively considerable.

Mogul (WAHA) 5: The commenter's opinion is noted. The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House and the Zanja are outside the boundaries of the established project area of Potential Effects as well as the Supplemental APE. No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

Further, the Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Mogul (WAHA) 6: The commenter's opinion is noted. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for more details.

Mogul (WAHA) 7: This comment is considered the opinion of the commenter and does not require a response.

Mogul (WAHA) 8: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Mogul (WAHA) 9: The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period. There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, property values would not be affected by the proposed project because no property acquisitions or displacements would occur. Further, the pattern and/or rate of existing or planned population or housing growth in the study area would not be affected by the proposed project because again no property acquisitions or displacements would occur.

The remainder of the comment is considered the opinion of the commenter and does not require a response, but refer to section 2.1.8 for traffic information, and section 2.2.5 of the environmental document for noise information. Lastly concerns over increased crime in the area should be communicated to the Los Angeles Police Department.

Mogul (WAHA) 10: As scientific studies and environmental regulations are expanding, their focus on the smaller particles in ambient air (total suspended particulate to PM10 to PM2.5) has grown. An increasing interest in particles of size < 0.1 microns, referred to as ultrafine particulate matter or ultrafine particulates (UFP or UFPs) is also developing. Although UFPs generally contribute to a small mass fraction of ambient PM, they are orders of magnitude more numerous than PM10 and PM2.5 particles. Their number concentrations range from 10 to 40×103 UFPs/cm3 in urban air and 40 to 1000 ×103 UFPs/cm3 near highways. UFPs are not currently regulated in the U.S.

There has been increasing interest among the scientific community in roadway impacts to air quality. SCAQMD also conducted a series of near roadway ambient air monitoring studies, which examined traffic impacts on concentrations of a host of pollutants, including UFP. On February 18, 2010, AQMD reported preliminary findings of a study conducted along I-710. AQMD collected ambient air samples along I-710 in two one-month intensive campaigns (February-March 2009 and July-August 2009). Samples were collected from one background location upwind of the freeway and two locations downwind of the freeway at 15m and 80 m. Air pollutant species measured included UFP count, black carbon (BC), PM10, PM2.5, NOx, CO, TSP lead and VOC. Preliminary results indicate that ambient air near I-710 (15m) was enriched in UFP. Similar to the results from other studies, UFP was significantly higher at the monitoring site closest (15m) to the roadway and dropped off with distance (80 m). Both downwind monitoring sites were higher than the upwind background measurement site. There was no significant difference in UFP count during winter vs. summer.

Information on UFP is limited at this time and is an area of active research. For example, physical transient behaviors such as particle growth and accumulation complicate the task of elucidating UFP concentration-response functions. Also, the existing state of knowledge does not yet support the derivation of reliable UFP emission models that account for the particulate growth and accumulation phases. Dispersion modeling of UFPs would also require additional information on the rate of UFP coagulation and absorption so that concentrations can be calculated. Given the lack of information to quantify emissions, dispersion, exposure, and health response to exposure and absence of emission factors for UFP made available by the CARB, UFP emissions are not quantified for the proposed project.

Some technical analyses have used CO concentrations as a surrogate for UFP particle number impacts. As seen in Tables 14 (below) of the September 2015 Air Quality Analysis, calculated CO emissions for all of the future Alternatives decrease along the proposed ramp compared to the 2014 baseline.

Table 14: Percent Changes in MSAT Emissions in the Off-Ramps

TAC	2014	Opening Year 2023 (g/day)				Horizon Year 2040 (g/day)			
	Existing (g/day)	No-Build	Build	%Δ from Existing	%Δ from No-Build	No-Build	Build	%Δ from Existing	%Δ from No-Build
PM10	112	132.9	164.2	47%	24%	143.5	177.2	58%	23%
PM2.5	47.6	55.8	68.7	44%	23%	60	74.3	56%	24%
Benzene	6.2	3.5	4.2	-32%	20%	3	3.3	-47%	10%
Acrolein	0	0	0	0%	0%	0	0	0%	0%
Acetaldehyde	0.9	0.5	0.5	-44%	0%	0.4	0.5	-44%	25%
Formaldehyde	3.5	1.9	2.1	-40%	11%	1.6	1.9	-46%	19%
Butadiene	0.8	0.3	0.3	-63%	0%	0.2	0.2	-75%	0%
Naphthalene	0.2	0.2	0.2	0%	0%	0.2	0.2	0%	0%
POM	0	0	0	0%	0%	0	0	0%	0%
Diesel PM	1.9	1.5	1.7	-11%	13%	1	1.2	-37%	20%
DEOG	4.2	3.9	4.7	12%	21%	3.4	4	-5%	18%

The proposed project has a construction duration of approximately 2.5 years. Emissions from construction activities therefore are considered temporary pursuant to 40 CFR93.123(c) (5). During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to construction. With incorporation of the proper avoidance, and minimization measures summarized in Table 1 of the environmental document, potential air quality impacts will be minimized.

In addition to fugitive dust emissions, heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO2, NOx, VOCs and some soot particulate (PM10 and PM2.5) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to certain sensitive receptors, certain construction activities, e.g., extended idling, material storage, and equipment maintenance, would need to be conducted in areas at least 500 feet away from those sensitive receptors.

An individual project does not generate enough GHG emissions to significantly influence global climate change. Caltrans has taken an active role in addressing GHG emission reduction and climate change by creating and implementing the Climate Action Program, which was published in December 2006. One of the main strategies in the Department's Climate Action Program to reduce GHG emissions is to make California's transportation system more efficient. The highest levels of CO2 from mobile sources, such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour. To the extent that a project relieves congestion by enhancing operations and improving travel times in high congestion travel corridors GHG emissions, particularly CO2, may be reduced.

Alternative 2 will improve air quality in the future. Caltrans Office of Environmental Engineering (Air Quality Branch) has evaluated the proposed Build Alternative for operational and temporary construction impacts on the ambient air quality in the project vicinity. The CO hot spot analysis demonstrates that the project meets conformity requirements. SCAG Transportation Conformity Working Group has concurred that the project is not an air quality concern for Particulate Matter (PM) 10 and PM2.5.There would be a decrease in emissions of some Mobile Source Air Toxics (MSAT) such as diesel particulate matters in 2023 and 2040 when compared to the base year conditions. MSAT emissions would likely be further reduced in the future due to implementation of future vehicle and fuel regulations by the Air Resource Board and the Environmental Protection Agency.

Mogul (WAHA) 11: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Mogul (WAHA) 12: The commenter's opinion is noted. The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the Project Study Area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

According to the Community Impact Assessment (August 2015), the proposed project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Commenter has not provided evidence to support the statement that the structure would divide the community. Further, as stated in the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period.

Mogul (WAHA) 13: The commenter's support for the No Build Alternative is noted. The commenter's opinion is also noted. This comment is considered the opinion of the commenter and does not require a response.

WAHA
West Adams Heritage Association

May 17, 2016

Ronald Kosinski
Deputy District Director
Garrett Damrath
Office Chief, Division of Environmental Planning
California Department of Transportation
100 S. Main Street, Suite 100 MS16A
Los Angeles, CA 90012

File: 07-LA-110PM 20.1/20.92 ISCH No. 2013021002t
110 HOV-HOT off ramp to Figueroa Way, Los Angeles CA,
EA:07-27800/EFIS#:0700000537

Mr. Damrath,

As a professional historic-preservation consultant I serve as a volunteer on the West Adams Heritage Association's Historic Preservation Committee. I am writing in that capacity to address what I find to be serious flaws in the above referenced environmental document and specifically in its' Visual Impact Assessment report (April 20, 2015).

In addition to my service with WAHA I am also the Chair of the Adams Dockweiler Heritage Organizing Committee, A.D.H.O.C. (1987). I have, in that role, already made written comment to the MND (March 21, 2016) as well as to the Caltrans' Notice Of Preparation (February 28, 2013).

Childs (WAHA) 1

By way of background I have resided for the past 38-years in the North University Park neighborhood, which is the eastern boundary of the greater WAHA community. My historic 1887 Eastlake-Victorian home is a LA City Historic-Cultural Monument #408 (1989) and is twice listed on the National Register of Historic Places; first as an individual structure (1988) and also as a contributor to the St. James Park Historic District (1991). My house at 2341 Scarff Street is just 3-streets form the Project's site which has allowed me to have a decades long unique and intimate knowledge of the challenges and changes to the setting of the intersection at Figueroa Street and Adams Boulevard which is the gateway-portal to the historic West Adams corridor.

1

Caltrans' own Architectural Historian, Diane Kane, in her Northern Terminus to the I-110 Harbor Freeway Transitway / Supplemental Historic Architecture Survey Report / P.M. 20.94-110331, December 15 1991 affirmed:

"The upper classes, who built palatial architect-designed homes around St. James Park, Adams Boulevard, Figueroa Street and Chester Place, continued to locate in West Adams during the 1890-1900 period. Representative of this era is Thomas D. Stimson, whose extravagant $130,000 Richardsonian Romanesque sandstone mansion, constructed in 1891 at 2421 South Figueroa Street, was described by contemporaries as the most expensive home built in Los Angeles to that date...

In the period between 1890 and 1905, St. James Park, North University Park, and the West Adams Boulevard corridor supplanted the older south downtown and Bunker Hill Neighborhoods of the 1870's and 1880's as the most prestigious neighborhood in the City. It continued to retain its genteel until the early 1920's...

The arrival of large institutions like St. Vincent de Paul's Catholic Church, St. John's Episcopal Church and the Automobile Club of Southern California testifies to the changing character of the West Adams neighborhood by the early to mid-20's. St. Vincent de Paul, built in 1924, was the result of a $1,5000.000 gift of oil millionaire Edward L. Doheny, whose house was located at 8 Chester Place, directly northwest of the church property... Legend has it that Mrs. Doheny requested the church be built at an angle to the intersection to insure that no other structures located on adjacent lots would be able to detract from its beauty.

Childs (WAHA) 2

By that time, The Automobile Club of Southern California had constructed its headquarters across the intersection. Built in 1923 by architects Silas Burns and Sumner Hunt, it to, was orientated to this important intersection. Constructed in the Spanish Colonial Revival style like its neighbor St. Vincent's the Auto Club addressed the corner with an octagonal three-story tower surmounted by a dome cupola. Its pedestrian entrance was highly embellished with classical motifs and a Baroque screen, while entrance to the auto court was more discreetly located to the south behind a large rubber tree.

Both buildings respected the scale of these to important boulevards (and their palatial homes) with generous 35-40' setbacks. As historic photos indicate, both Adams and Figueroa always were very wide streets with gracious treelawns and sidewalks... Adams also had a landscaped median which began west of the Automobile Club property line."

Not surprising, the intervening 90-years have seen have seen many changes, both good and bad, in the evolution of Los Angeles including West Adams. Certainly there are many examples of our historic "Paradises" that have been lost to the inevitable parking lot. However in spite of all the changes the historic integrity and context of Ms. Kane's reported "*important intersection*" of Adams and Figueroa and the WAHA corridor still survive today.

The Adams Boulevard "*landscaped meridian*" is gone. The "*generous setbacks... gracious treelawns and sidewalks*" have been lost to various street widening efforts to

Childs (WAHA) 3

2

expedite automobile traffic including the Caltrans' Northern Terminus to the I-110 Harbor Freeway Transitway Project (1991). The magnificent 19th century J. Ross Clark, Mark & Caroline Severance, and Frank Sabichi mansions on Adams and Figueroa are today, actual parking lots. Although these losses and others have certainly negatively impacted historic North University Park what remains is unquestionably a substantive and vital City historic resource.

The last 30-years of community commitment to insure the preservation of the reaming historic assets led by WAHA and the sister local organizations, A.D.H.O.C. and the North University Park Community Association (N.U.P.C.A.) has been a success. By following a traditional process of "identifying, researching and designating" historic resources preservation advocates have protected scores of local structures as City Cultural-Historic Monuments, hundreds listed on the National Register of Historic Places, and thousands as part of the City's Historic Preservation Overlay Zones.

The magnificent visual architectural triptych of the WAHA gateway-portal at the intersection of Adams and Figueroa still survives as it was built in the 1920's. As does a significant remainder of 1880's, 1890's and early 20th century residential structures along the initial "*West Adams Boulevard corridor*" from Figueroa to Hoover Street along with several remaining historic resources on the west side of Figueroa between Adams and 23rd Street:

- 514 W. Adams / St. John's Episcopal Cathedral (1924, LA-HCM #516 and individually listed on the National Register of Historic Places).
- 621 W. Adams / St. Vincent De Paul Roman Catholic Church (1924, LA-HCM #90 and a contributor to the Chester Place National Register Historic District,
- 650 W. Adams / Automobile Club of Southern California headquarters (1922, LA-HCM #72).
- 2437 S. Figueroa / Circa 1880 Woolen Mills 8-R Segment of LA City Zanja and site of 1889 Sabichi Mansion, (contributors to the Chester Place National Register Historic District).
- 2421 S. Figueroa / Stimson Residence (1891, LA-HCM #212 and a contributor to the Chester Place National Register Historic District).
- 2321 S. Figueroa / The Voss Residence (1890, contributor to the Chester Place National Register Historic District).
- 2307 S. Figueroa (650 W. 23rd) / Connell Carriage House (1888 LA-HCM # and a contributor to the Chester Place National Register Historic District
- 649 W. Adams / Randolph Huntington Minor House (1905, and a contributor to the Chester Place National Register Historic District)

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- Chester Place entrance gates / (1895, contributor to the Chester Place National Register Historic District)
- 734 W. Adams / Kerkhoff House (1906, LA-HCM #606).
- 745 W. Adams / Garner Residence (1909 contributor to the Chester Place National Register Historic District).
- Entrance to St. James Park / (1895, contributor to the St. James Park National Register Historic District)
- 839 W. Adams / Ezra Stimson House (1901 LA-HCM #456 and contributor to the University Park HPOZ).
- 854 W. Adams / The Varner House / (1890, individually eligible for listing on the National Register).
- 900 W. Adams (2625 Portland) R.J. Waters Carriage House (1890, individually eligible for listing on the National Register).
- 948 W. Adams / Second Church of Christ (1910, LA-HCM #57).
- 2600 S Hoover / Casa de Rosas-Sunshine Mission (1892, LA-HCM #241 and individually listed on the National Register of Historic Places)

Childs (WAHA) 3

Today, Caltrans is now proposing to add their $43,000,000 above-grade visual blight of a two-lane 50-foot high arching HOT ramp into what has been historically a setting bereft of such repugnant concrete intrusions.

Although the existence of two National Register Historic Districts, a LA City Historic Preservation Overlay Zone and numerous LA City Cultural Monuments that the still line the historic WAHA corridor and its' gateway portal, Caltrans' staff finds insufficient potential negative impacts to the existing historic resources caused by the visual intrusion into the context of this historic setting by their "Flyover" Project.

Caltrans has chosen, institutionally, to obfuscate the importance of our historic resources through bureaucratic finagling and myopic self-serving parsing throughout their MND, and attachments to falsely claim the proposed superficial mitigations could reduce the impacts to less then significant.

Childs (WAHA) 4

The preparer of the Caltrans' Visual Impact Report George Olguin, Project Landscape Associate, completely ignores the actual affected historic setting's context and describes the location this way:

"A check of the Zoning and General Plan for the area indicates the area to be comprised of commercial, industrial, open space and residential multiple family land use designations. Various types of building structures surround the project area, gas stations, strip malls, old buildings, churches and non-descript office buildings, they make-up the man-made visual resource."

The complete lack of respect for our historic legacy is unconscionable. The preparer's "*old buildings*" are in reality the 1891 Stimson Residence, the 1895 Slauson Residence, and the 1888 Connell Carriage House all of which are directly across Figueroa from the Flyover's landing spot where they have bee for the last 125 years. The preparer's reference to "*churches*" is St. John's Episcopal Cathedral and St. Vincent De Paul Roman Catholic Church. The preparer's listing of "*non-descript office buildings*" would include the Automobile Club of Southern California headquarters. The preparer while identifying the location as having "*open space*" fails to inform the reader that the open space is actually the result of the I-110 Freeway being below grade in the Doheny Ditch incut.

Childs (WAHA) 4

I recently wrote a Flyover background article for the West Adams Heritage Association's newsletter WAHA MATTERS (October 2015) titled "DOHENY DITCH vs. 110-FLYOVER". In it I reported:

> *"The story is told that in the early 1950's when Caltrans was in the process of determining a route south for the Harbor Freeway extension from downtown to San Pedro Madame Estelle (Doheny) was distraught that it would directly and severally impact "her" Chester Place and "her" St. Vincent's Church.*
>
> *The very thought that a public freeway would be erected on "her" doorstop was not acceptable. Through her enormous wealth and political influence she would insure that the new right-of-way would not be allowed to negatively impact her realm.*
>
> *Confronted with bureaucratic push back about the prohibitive costs of engineering changes to the proposed route by taking it below grade into a "slot" or "incut" to mitigate the intrusion of visual blight, noise and toxic pollution, Madame simply hired her own planners and engineers to design the necessary changes and forwarded them to Caltrans for implementation.*
>
> *The reality of truth-or-legend is that the Caltrans' slot-incut was indeed constructed sparing that portion of the east side of University Park along the Chester Place frontage from the visual intrusion of the freeway. When completed in 1957 the slot-incut or "ditch" resulted in an at-grade streetscape vista along Figueroa between 23rd Street and Adams Boulevard that was an open space void of the highways traffic. The "ditch" established a new environmental context for the surrounding historic setting that has existed for the last 58 years.*
>
> *People entering or exiting our historic West Adams community at Figueroa can enjoy this sheltered open space without being confronted with the repressive visual blight that our freeway system has inflicted on so much of Los Angeles. So also can the worshippers at two of the finest examples of religious architecture in the city, St. John's and St. Vincent's."*

Childs (WAHA) 5

I point out that there has been no acknowledgement by Caltrans in any of their historic impact evaluations of the importance of the context of the Adams-Figueroa I-110 Freeway incut (ditch) itself as a historic-cultural resource setting.

Constructed during the mid 1950's the Doheny Ditch is over 50-years old and thereby more than qualified for listing as a cultural-historic resource. Therefore its' significance and context should have been included on any environmental assessment of the Project's impacts. That the jaundiced Caltrans' MND omitted any discussion of the consequence of the incut to the historic setting, resulting in above grade open space that the North University Park community has visually benefited from, is negligent.

Childs (WAHA) 5

Caltrans has been gaming the edges of bureaucratic procedures throughout the environmental process. They have limited the APE, misrepresented the reality of the historic context, manipulated their graphic evidence to malign the existing historic resources and subverted the CEQA process to reach their foregone conclusions.

The Visual Impact Assessment preparer in his section, "Visual Resources and Resource Change" states:

> *"The visual character of the proposed project will be compatible with the existing visual character of the corridor. This is an urban area so the extension of the viaduct would not intrude the visual character of the proposed corridor...The visual quality of the existing corridor will not be altered by the proposed project."*

The preparer's comments regarding the "corridor" is not about the historic setting and context of the West Adams Boulevard corridor, which for Caltrans' purposes is not even an issue, being outside their defined APE, but rather:

> *"The project corridor is defined as the area of land that is visible from, adjacent to, and outside the highway right-of-way, and determined by typography, vegetation and viewing distance."*

Childs (WAHA) 6

The preparer offers about a dozen photographs taken along their I-110 Freeway "corridor" as evidence of the existing urbanization of that setting to support the hypothesis that there will be no additional negative impacts by the Flyover Project. The majority of the photographs were taken south of the subject site at 28th Street and feature the associated visual blight brought about by the creation of the Freeway itself and later its' HOV-HOT lanes, along with the addition of Metro's Exposition rail line: there are photos of desolate concrete roadways, empty rail tracks, chain link fencing and their abandoned 1991 Flyover viaduct ramp which seems to be waiting for its completion.

While these wide-angle photographs certainly capture the negative blight associated with highway intrusions in urban centers they cannot be a justification for imposing additional blight on a community. Today this visual bifurcation of the community ends at 28th Street and serves as a telling warning about what the proposed Flyover Project will do to the existing historic setting at Adams and Figueroa. As I noted earlier there are no photographs of the reported "open-space" that could have provided for some context.

The VIA preparer in his section, "Viewers and Viewer Response" ineptly evaluates who has a view of the Flyover and how they are affected:

> *"Neighbors (people with views to the road) and highway users will not be affect by the proposed project. There are two primary viewer groups those who would see the HOV roadway from local streets, buildings and those on the structure in vehicles. The primary viewer groups from arterials streets and buildings would be students, office workers and shoppers. The primary viewer groups from the HOV roadway would be commuters and riders on buses."*

Although I have no argument that the HOV-HOT viewers will be "*commuters and riders on buses*". I find it however presumptuous that the preparer would conclude that viewers "*from arterials streets and buildings would be students, office workers and shoppers*". Certainly it is an omission to have not included the parishioners of both St. John's and St. Vincent's. It is also ambiguous as to what he means by "*students, office workers and shoppers*".

- There are undergraduate college students studying at the University of Southern California and Mount St. Mary's University.
- There are children from the New Design Charter School and the Catholic St. Vincent's School and Norwood Elementary.
- There are Graduate students, many from downtown, working on their Masters and Doctorates in the evenings and on weekends.
- There are students taking classes at Los Angeles Trade-Technical City College.
- There are students seeking guidance at the Art of Living Foundation, the Theosophy Center and at Hebrew Union College.
- There are of course the students' teachers and professors.
- There are office workers from the Auto Club Headquarters.
- There are office workers from the Bank of America.
- There are office workers from all of the aforementioned educational and religious institutions.
- Although there are no large chain-retail destination outlets in North University Park there are an abundance of fast-food outlets that many of the "students" shop at.

Childs (WAHA) 7

What the preparer chose not to discuss is that not all of the "*commuters and riders on buses*" on the I-110 Freeway are limited to special entitled HOT drivers whose destination is a downtown office tower. The Adams Boulevard and Figueroa Street exits from the I-110 and the I-10 freeways bring people from all over the Southland and beyond to our University Park neighborhood because it is the destination and not somewhere to Flyover.

The numbers religious and educational facilities that are located in the University Park area attract thousands of daily travelers many of whom arrive from the freeway system. What they view today is substantially what they would have viewed over sixty-years ago; grand architectural structures that stand as testimony to an historic era of our City's migratory growth south and west during the 1880' s through the 1910's coupled with a wide open space that was created by the fortunate design choice of an in-cut for the I-110 Freeway thus sparing the community the visual blight inflicted on other parts of West Adams.

The destruction of so much of the City's historic fabric by the unfortunate bureaucratic programs of "Urban Renewal" and "Interstate Highways" during the 1950's and 1960's is another era of our City's growth. It is a dark period that saw the dismantling of our urban transportation rail system, the razing of Bunker Hill and the bifurcation of historic neighbors by the concrete walls that support a transit system that today is failing and is an out-of-date concept for our future in the 21st Century.

Besides being a destination in its' own right, North University Park is a literal crossroad offering those exiting the Freeways access to venues along the Figueroa Corridor ranging from the Staples Center on the north to Exposition Park on the south as well as the West Adams Boulevard corridor to the west.

Travelers exiting the south-bound I-110 and I-10 arrive at 23rd street and merge along Figueroa-Way past the Chester Place National Register Historic District, home to Mount St. Mary's University. They drive by the historic Voss and Stimson mansions, many heading to the University of Southern Campus (1881) or to some of the venues at Exposition Park, the Natural History Museum (1910), the Rose Garden (1928), and the Los Angeles Coliseum (1923).

Travelers exiting the north-bound I-110 arrive on Adams Boulevard and, when turning west, are immediately presented with an exceptional viewing experience, the Adams and Figueroa intersection with its' historic architectural triptych of St; John's, St. Vincent's, and the Automobile Club.

Childs (WAHA) 8

Turn left if you're late for your class at USC or taking the family for an outing at the Black History Museum. Turn right for a concert at LA Live or the Auto Show at the Convention Center. Go straight ahead into the heartland of historic West Adams.

This unique opportunity has been available to generations of freeway travelers. Any count would be in the millions of people over the last 60-years who have enjoyed this vista. Today Caltrans' would obstruct this view with their Flyover viaduct. The proposed "build alternative" Project is an unwarranted and unjustifiable intrusion that defiles the existing historic character defining setting of one of the most important and historically significant intersections within the City of Los Angeles

Caltrans, in their environmental review process, has not addressed the view issues associated with the acknowledged open space as a historic resource nor have they commented on the viewshed by those exiting the I-110 Freeway onto west bound Adams Boulevard. Their MND is inadequate and I call for then to either pursue the Draft Environmental Impact Report that they claimed to be doing with their issuance of their NOP in 2013 or make a finding for the "No Project Alternative" and abandon today's proposed Flyover Project as they wisely did in 1991.

Childs (WAHA) 9

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Childs (WAHA) 1: The commenter's experience and opinion is noted. The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Childs (WAHA) 2: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Childs (WAHA) 3: The commenter's opinion is noted. The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Childs (WAHA) 4: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details. Note the Visual Impact Assessment considered views both at the street level and elevated portion of the proposed HOT structure. The views were inward as well as outward from the proposed HOT structure. The remainder of this comment is considered the opinion of the commenter and does not require a response.

Childs (WAHA) 5: The Interstate 110 Harbor Freeway was not considered for historic significance in the identification phase of the cultural resources studies because the Advisory Council on Historic Preservation passed a Section 106 exemption which excludes most of the Interstate Highway System from being considered historic properties under Section 106 of the National Historic Preservation Act (2005). MAP 21 maintains the exemption (23 USC Section 103).

By establishing these exemptions, most of the Interstate Highway System was removed from the jurisdiction of Sections 106, but special features are nonetheless subject to conformance with applicable historic preservation regulations. Section II of the Section 106 exemption allows certain elements of the Interstate Highway System, including bridges, tunnels, and rest stops, to be excluded from the exemption *if they can be demonstrated to possess national and/or exceptional historic significance*.

Review of the "Final List of Nationally and Exceptionally Significant Features of the Federal Interstate Highway System" revealed no recommended elements on Interstate 110 (https://www.environment.fhwa.dot.gov/histpres/highways_list.asp). As stated above, because I-110 is part of the National Highway System, it falls within the purview of the exemption.

With Caltrans project managers, Caltrans Professionally Qualified Staff are jointly responsible for describing and establishing project Areas of Potential Effect. The project APE map was prepared to ensure identification of significant historical, architectural, and archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (National Register) that may be directly or indirectly affected by the proposed project, in compliance with 36 Code of Federal Regulations (CFR) Part 800.16(d). The direct APE encompasses all ground disturbances associated with the project. The indirect APE includes the direct APE, and extends to include parcels that directly face the proposed project and may be affected by its construction or implementation. The indirect APE also includes parcels that could have visual, noise or vibration effects caused by proposed project construction or implementation. In response to comments from Consulting Parties, and following a conversation with SHPO reviewers, a Supplemental APE was prepared to include additional properties in the indirect APE that may be in view of the proposed flyover. Areas of Potential Effects are established without consideration of what may or may not be known historic properties. The boundary is drawn to ensure that those properties are considered in the process, only if there is a chance that the project may directly or indirectly affect the property. Properties that would are not expected to be affected are not included in a project APE merely because they are within a certain distance of the proposed project.

Childs (WAHA) 6: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details. Further, the Visual Impact Assessment (August 2015) considered views both at the street level and elevated portion of the proposed HOT structure. The views were inward as well as outward from the proposed HOT structure. The remainder of this comment is considered the opinion of the commenter and does not require a response.

Childs (WAHA) 7: According to the FHWA Guidelines for the Visual Impact Assessment (VIA) of Highway Projects (January 2015), visual quality is an aesthetic issue. Aesthetics is the study of perceptual experiences that are pleasing to people. Visual quality is, therefore, the experience of having pleasing visual perceptions. Although background and former experiences make each individual's experience of visual quality unique, human perception of what constitutes a pleasing landscape is remarkably consistent, not only within a society but, across cultures.

A viewer observing an existing scene has a range of available responses that are inherent to all human beings. The FHWA VIA guidelines recognize three types of visual perception, corresponding to each of the three types of visual resources.

- When viewing the components of a scene's natural environment, viewers inherently evaluate the *natural harmony* of the existing scene, determining if the composition is harmonious or inharmonious
- When viewing the components of the cultural environment, viewers evaluate the scene's *cultural order*, determining if the composition is orderly or disorderly
- When viewing the project environment, viewers evaluate the coherence of the project components, determining if the project's composition is coherent or incoherent

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Childs (WAHA) 8: The commenter's opinion is noted. The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House and the Zanja are outside the boundaries of the established project area of Potential Effects as well as the Supplemental APE. No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

Further, the Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

The remainder of this comment is considered the opinion of the commenter and does not require a response.

Childs (WAHA) 9: The commenter's opinion is noted. The Visual Impact Assessment (August 2015) considered views both at the street level and elevated portion of the proposed HOT structure. The views were inward as well as outward from the proposed HOT structure. The remainder of this comment is considered the opinion of the commenter and does not require a response.

The Notice of Preparation (NOP) for the proposed project of an EIR was sent to the State Clearinghouse in error. A memo was sent to the State Clearinghouse to correct this error in February 2013. The memo correctly stated that the CEQA document being prepared is an Initial Study, and Caltrans would like to request that the Notice of Preparation of an EIR be rescinded and a Notice of Early Consultation be issued in its place. In 2016, a notice of availability of the draft Initial Study/Environmental Assessment (IS/EA) and the notice of intent to adopt a Mitigated Negative Declaration/Finding of No Significant Impact (MND/FONSI) was made public.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

The remainder of the comment is considered the commenter's opinion and does not require further response, but the commenter's support for the No Build Alternative is noted.

Fajnor Traffic Comment Letter 1

Craig Fajnor
EcoTierra Consulting

WAHA Comment Letter on Caltrans I-110 High Occupancy Flyover IS/MND

The Traffic Report prepared for the proposed project uses inconsistent assumptions, contains erroneous and misleading information, and inaccurately accounts for changes in traffic patterns that would result from the project, rendering it completely ineffective in identifying the potential traffic impacts of the project, and in proving the purpose and need for the project. The Traffic Report must be revised and recirculated before the lead agency can make an informed decision on the project.

1. The Traffic Report includes wildly inconsistent assumptions between the AM and PM peak hours as to the effect of the proposed project on diverting traffic from the Adams Boulevard/I-110 Northbound Off-Ramps intersection, which is a primary rationale for constructing the proposed project.

The Draft Initial Study/Proposed Mitigated Negative Declaration ("Draft IS/PMND") includes the Traffic Study Report (Addendum), dated April, 2015 (the "Traffic Report") that analyzes traffic conditions, both with and without the project, at 4 study intersections for two study years, 2018 and 2040. Presently, traffic exits the I-110 freeway via one of two ramps. The HOT exit ramp represents the end of the northbound I-110 HOT lane, while the freeway mainline exit ramp serves all non-HOT lane traffic exiting to Adams Boulevard. Both of these ramps presently end at a "T" intersection with Adams Boulevard[1] (the "Adams intersection", identified as Intersection 8 in the Traffic Report). From a traffic perspective, the effect of the proposed project would be to divert traffic from this intersection to the proposed flyover ramp, which would then discharge the diverted traffic directly onto northbound Figueroa Street.

Examination of the assumptions contained in the Traffic Report identifies substantial inconsistencies between the AM and PM peak hours with respect to the expected diversion of traffic as a result of the proposed project. While these assumptions are not explicitly stated in the Traffic Report, they can be discerned from the traffic volumes shown in the Traffic Report. These volumes are shown in two locations in the Traffic Report – graphically in Exhibits 1 through 10, and in worksheet format in Appendices A through D. Table 1 shows the intersection volume data from both sources for the Adams intersection for all study years and study conditions.

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[1] *The Traffic Report does not seem to understand this existing condition. The Traffic Report claims on page 2 that vehicles using the existing HOT northbound off-ramp approach queue into the freeway mainline, thereby causing a potential for rear end collisions. This is not physically possible, as the HOT off-ramp is a direct extension from the HOT lane to its termination at Adams Boulevard. Nor is there any possibility for vehicles queueing into the freeway mainline from the mainline off-ramp, as this ramp is over one-quarter mile in length. Regardless, no queueing analysis is provided for either of the existing off-ramps in the Traffic Report, and the claim is therefore completely unsubstantiated.*

Table 1
Intersection Volumes for Adams Boulevard/I-110 Freeway Northbound Off-ramps (Intersection 8) – AM Peak Hour

From Traffic Report Exhibits 1, 2, 3, 7, and 8				
Year/Condition	Left Turns from HOT Lane Off-Ramp	Right Turns from HOT Lane Off-Ramp	Left Turns from Freeway Mainline Off-Ramp	Right Turns from Freeway Mainline Off-Ramp
2014 – Baseline (Exhibit 1)	794	385	313	162
2018				
Without Project – Exhibit 2	1013	400	329	170
With Flyover Project (Alt 2) – Exhibit 3	77	194	119	170
Diverted Trips With Project	936	206	210	0
% Reduction With Project	92.4%	51.5%	63.8%	0.0%
2040				
Without Project – Exhibit 7	1090	431	354	183
With Flyover Project (Alt 2) – Exhibit 8	82	209	128	183
Diverted Trips With Project	1008	222	226	0
% Reduction With Project	92.5%	51.5%	63.8%	0.0%
From Traffic Report Calculation Data Sheets, Appendix A and Appendix C				
Year	Left Turns from HOT Lane Off-Ramp	Right Turns from HOT Lane Off-Ramp	Left Turns from Freeway Mainline Off-Ramp	Right Turns from Freeway Mainline Off-Ramp
2014 (Appendix A)	863	418	340	176
2018 (Appendix A)				
Without Project	1101	435	357	185
With Flyover Project (Alt 2)	83	211	129	185
Diverted Trips With Project	1018	224	228	0
% Reduction With Project	92.5%	51.5%	63.9%	0.0%
2040 (Appendix C)				
Without Project	1185	468	384	199
With Flyover Project (Alt 2)	90	227	139	199
Diverted Trips With Project	1095	241	245	0
% Reduction With Project	92.4%	51.5%	63.8%	0.0%

Source: Traffic Study Report (Addendum) I-110 High Occupancy Toll/HOV (HOT) Elevated NB off-ramp @ Adam(sic) Blvd., Caltrans, April, 2015.
Note: The differences in the traffic volumes between the Traffic Report exhibits and the Traffic Report worksheets, while confusing, is not relevant to the analysis.

As shown, the assumptions regarding traffic diversion during the AM peak hours as a result of the proposed project are:

- 92.5% of traffic that presently turns left onto Adams Boulevard from the HOT off-ramp would use the flyover ramp instead.
- 51.5% of traffic the presently turns right onto Adams Boulevard from the HOT off-ramp would use the flyover ramp instead.
- 63.8% of the traffic that presently turns left onto Adams Boulevard from the freeway mainline off-ramp would use the flyover ramp instead.
- None of the traffic that presently turns right onto Adams Boulevard from the freeway mainline off-ramp would use the flyover ramp.

None of these assumptions is specifically identified in the Traffic Report, and no substantial evidence is provided as to why they are appropriate for use in the Traffic Report. The high proportion of traffic diversion from the HOT off-ramp would seem reasonable, as this is the primary rationale for pursuing the proposed project. The diversion of nearly two-thirds of existing left turns from the freeway mainline off-ramp to the HOT flyover ramp seems more questionable, although perhaps the Traffic Report is assuming that more vehicles will use the HOT (i.e., toll) lane once the proposed flyover ramp is available. However, the basis for this assumption is not stated or justified in the Traffic Report.

Compared to the consistency of assumptions used for the AM peak hour analysis, the intersection volumes shown in Table 2 for the PM peak hour demonstrate widely varying assumptions regarding the diversion of traffic from the Adams intersection to the proposed flyover ramp.

- The Traffic Report data show that, in 2018, 82.9%-85.6% of traffic that presently turns left onto Adams Boulevard from the HOT off-ramp would use the flyover ramp instead.
- The Traffic Report data show that, in 2018, none of the traffic the presently turns right onto Adams Boulevard from the HOT off-ramp would use the flyover ramp.
- The Traffic Report data show that, in 2018, 72.8%-87.3% of the traffic that presently turns left onto Adams Boulevard from the freeway mainline off-ramp would use the flyover ramp instead.
- The Traffic Report data show that, in 2018, between 39.6% and 75.2% of the traffic that presently turns right onto Adams Boulevard from the freeway mainline off-ramp would use the flyover ramp instead.
- The Traffic Report data further show that, in 2040, only 14.5% of the left turning traffic from the HOT off-ramp and none of the right turning traffic would be diverted from the Adams Boulevard intersection. However, 29.1% of the left turning traffic and 39.4% of the right turning traffic from the freeway mainline off-ramp would be diverted from the Adams intersection.

As with the AM peak hour, none of these assumptions are explicitly identified in the Traffic Report, and no evidence is provided as to their appropriateness for use in the Traffic Report. Further, the wide variance in assumptions for the PM peak hour compared to the AM peak hour, and between the 2018 and 2040 analysis years, calls into question the validity of these assumptions, and the reliability of any analysis based upon them. There does not appear to be any rationale that could conceivably justify these discrepancies.

Table 2
Intersection Volumes for Adams Boulevard/I-110 Freeway Northbound Off-ramps (Intersection 8) – PM Peak Hour

From Traffic Report Exhibits 4, 5, 6, 9, and 10				
Year/Condition	Left Turns from HOT Lane Off-Ramp	Right Turns from HOT Lane Off-Ramp	Left Turns from Freeway Mainline Off-Ramp	Right Turns from Freeway Mainline Off-Ramp
2014 – Baseline (Exhibit 4)	484	129	688	279
2018				
Without Project – Exhibit 5	614	135	722	293
With Flyover Project (Alt 2) – Exhibit 6	105	135	197	177
Diverted Trips With Project	509	0	525	116
% Reduction With Project	82.9%	0.0%	72.7%	39.6%
2040				
Without Project – Exhibit 9	661	146	777	315
With Flyover Project (Alt 2) – Exhibit 10	565	146	197	191
Diverted Trips With Project	96	0	226	124
% Reduction With Project	14.5%	0.0%	29.1%	39.4%
From Traffic Report Calculation Data Sheets, Appendix B and Appendix D				
Year/Condition	Left Turns from HOT Lane Off-Ramp	Right Turns from HOT Lane Off-Ramp	Left Turns from Freeway Mainline Off-Ramp	Right Turns from Freeway Mainline Off-Ramp
2014 – Baseline (Appendix B)	526	141	748	303
2018 (Appendix B)				
Without Project	668	147	785	318
With Flyover Project (Alt 2)	96	90	100	79
Diverted Trips With Project	572	57	685	239
% Reduction With Project	85.6%	38.8%	87.3%	75.2%
2040 (Appendix D)				
Without Project	719	158	845	343
With Flyover Project (Alt 2)	614	158	599	208
Diverted Trips With Project	105	0	246	135
% Reduction With Project	14.6%	0.0%	29.1%	39.4%

Source: Traffic Study Report (Addendum) I-110 High Occupancy Toll/HOV (HOT) Elevated NB off-ramp @ Adam(sic) Blvd., Caltrans, April, 2015.
Note: The differences in the traffic volumes between the Traffic Report exhibits and the Traffic Report worksheets, while confusing, is not relevant to the analysis.

2. The inconsistent and illogical assumptions regarding diversion of traffic during the PM peak hour render the entire analysis provided in the Traffic Report useless in evaluating the PM peak hour impacts of the proposed project.

As noted, the wide variance in assumptions related to traffic diversion to the proposed flyover ramp in the PM peak hour compared to the AM peak hour, and between the 2018 and 2040 analysis years, is not explained in the Traffic Report, and no apparent rationale appears to be even possible to explain these differences. Other specific assumptions contained in the Traffic Report's PM peak hour analysis are similarly baffling. Why the project would affect right turning traffic onto Adams Boulevard to a greater extent than left turning traffic in 2040 is quite mysterious, as is the extraordinarily low effectiveness of the project in diverting traffic from the HOT lane that is assumed for the proposed project in 2040. Why is 85.6% of the HOT lane traffic that presently turns left on Adams diverted to the flyover ramp in 2018, but that percentage drops to 14.6% in 2040? If true, this assumption directly undermines the primary purpose of providing the project, that is, to facilitate the movement of traffic that uses the HOT lane away from the Adams intersection. In other words, taking the Traffic Report at face value, it is assuming that, by 2040, the proposed project is no longer functioning to divert traffic from the Adams intersection, directly contrary to the stated Purpose and Need for the project contained in the Draft IS/PMND.

In total, the inconsistent and unsupported data and assumptions presented in the Traffic Report for the PM peak hour render suspect all analysis and conclusions provided for PM peak hour traffic conditions in the Draft IS/PMND. In accordance with CEQA Guidelines Section 15384, "unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate ... does not constitute substantial evidence." Accordingly, the Draft IS/PMND does not provide any substantial evidence regarding the impacts of the proposed project during the PM peak hour, and must be revised and recirculated before the lead agency can make any decisions regarding the proposed project.

3. The Traffic Report does not accurately account for the diversion of traffic to Figueroa Street as a result of the proposed project and therefore underestimates the impact of the project at the Figueroa Street/23rd Street intersection.

In addition to questions regarding the assumptions used in the Traffic Report's analysis of the effects of the proposed project on the distribution of traffic, the Traffic Report is internally inconsistent with respect to the disposition of the traffic that would be diverted from the Adams intersection. This is apparent from comparing traffic volumes for with project and without project conditions for two intersections – the Adams intersection, and the Figueroa Street/23rd Street intersection (the "23rd Street intersection", identified as Intersection 18 in the Traffic Report). These two intersections are directly interrelated as a consequence of the operation of the project, as they represent the only two options for the traffic exiting the freeway under the without project and with project conditions. Under the without project condition, all HOT lane and mainline traffic exiting the freeway at Adams Boulevard would travel through the Adams intersection, as it does today. Under the with project condition, some of this traffic would be diverted to the proposed flyover ramp, where it would exit to Figueroa Street. For this traffic, no turns are possible from the point where the flyover ramp intersects Figueroa Street to the 23rd Street intersection. Accordingly, the Traffic Report should reflect a direct correlation between the reduction in the number of cars at the Adams intersection, and the increase in the number of cars on the northbound approach to the 23rd Street intersection.

However, examination of the Traffic Report data for the 23rd Street intersection, shown in Table 3, demonstrates that the Traffic Report underestimates the project-diverted traffic on Figueroa Street by 34.5%, or up to 545 cars during the AM peak hour, for all study years. This result is based not in traffic engineering, but in arithmetic, because the physical configuration of the existing streets and the proposed project necessitates that this relationship exist. The lead agency must specifically address the effects of the increased project-related traffic on northbound Figueroa Street that could potentially result in significant traffic impacts at the 23rd Street intersection in a revised and recirculated traffic report. Impacts at this intersection must be mitigated, and additional intersections to the north, such as Figueroa and Washington Boulevard that could be impacted by traffic that would be diverted to Figueroa Street by the proposed project must be analyzed in the IS/MND before it can be adopted by the lead agency.

Table 3
Intersection Volumes for Figueroa Street/23rd Street Intersection (Intersection 18) – AM Peak Hour

From Traffic Report Exhibits 1, 2, 3, 7, and 8				
Year/Condition	Northbound Approach to Figueroa/23rd Intersection	Trips Diverted from Adams Intersection	Trip Deficit	Trip Deficit %
2014 – Baseline (Exhibit 1)	2780			
2018				
Without Project – Exhibit 2	2891			
With Flyover Project (Alt 2) – Exhibit 3	3778			
Diverted Trips With Project	887	1352	465	34.4%
% Increase With Project	30.7%			
2040				
Without Project – Exhibit 7	3111			
With Flyover Project (Alt 2) – Exhibit 8	4066			
Diverted Trips With Project	955	1456	501	34.4%
% Increase With Project	30.7%			
From Traffic Report Calculation Data Sheets, Appendix A and Appendix C				
2014 – Baseline (Appendix A)	3023			
2018 (Appendix A)				
Without Project	3142			
With Flyover Project (Alt 2)	4105			
Diverted Trips With Project	963	1470	507	34.5%
% Increase With Project	30.6%			
2040 (Appendix C)				
Without Project	3382			
With Flyover Project (Alt 2)	4418			
Diverted Trips With Project	1036	1581	545	34.5%
% Increase With Project	30.6%			

Source: Traffic Study Report (Addendum) I-110 High Occupancy Toll/HOV (HOT) Elevated NB off-ramp @ Adam(sic) Blvd., Caltrans, April, 2015. Note: The differences in the traffic volumes between the Traffic Report exhibits and the Traffic Report worksheets, while confusing, is not relevant to the analysis.

4. The inaccuracies and errors in the Traffic Report provide substantial evidence for a fair argument that the proposed project may result in significant traffic impacts not identified in the Draft IS/PMND that must be remedied by revision and recirculation of the Traffic Report and Draft IS/PMND.

In short, as documented in the preceding discussions, the Traffic Report included in the Draft IS/PMND "cooks the books". It consistently overestimates the benefits of the proposed flyover ramp on the Adams intersection while substantially underestimating the impacts of the traffic that the proposed project would divert to Figueroa Street on the 23rd Street intersection, and potentially other Figueroa Boulevard intersections. It fails to account entirely for the effects of at least one-third of the traffic that would use the proposed flyover ramp. The traffic analysis in the Draft IS/PMND provides no support for any contention that the proposed project would meet the purpose and need for the project, or that it would improve traffic conditions for either project users or other users in the area that would be served by the project. In order to remedy these deficiencies, the Traffic Report and Draft IS/PMND must be revised to include consistent and clearly stated assumptions regarding the diversion of traffic that is expected to occur under the project, supported by substantial evidence, and to provide accurate and reliable calculations of the effects on intersection delay and level of service that would result from the proposed project.

Fajnor Traffic Comment Letter: Caltrans Division of Traffic Investigations concurs that the statement on page 2 of the Traffic Report is misleading. The queuing is onto the HOT mainline, not the freeway mixed use mainline.

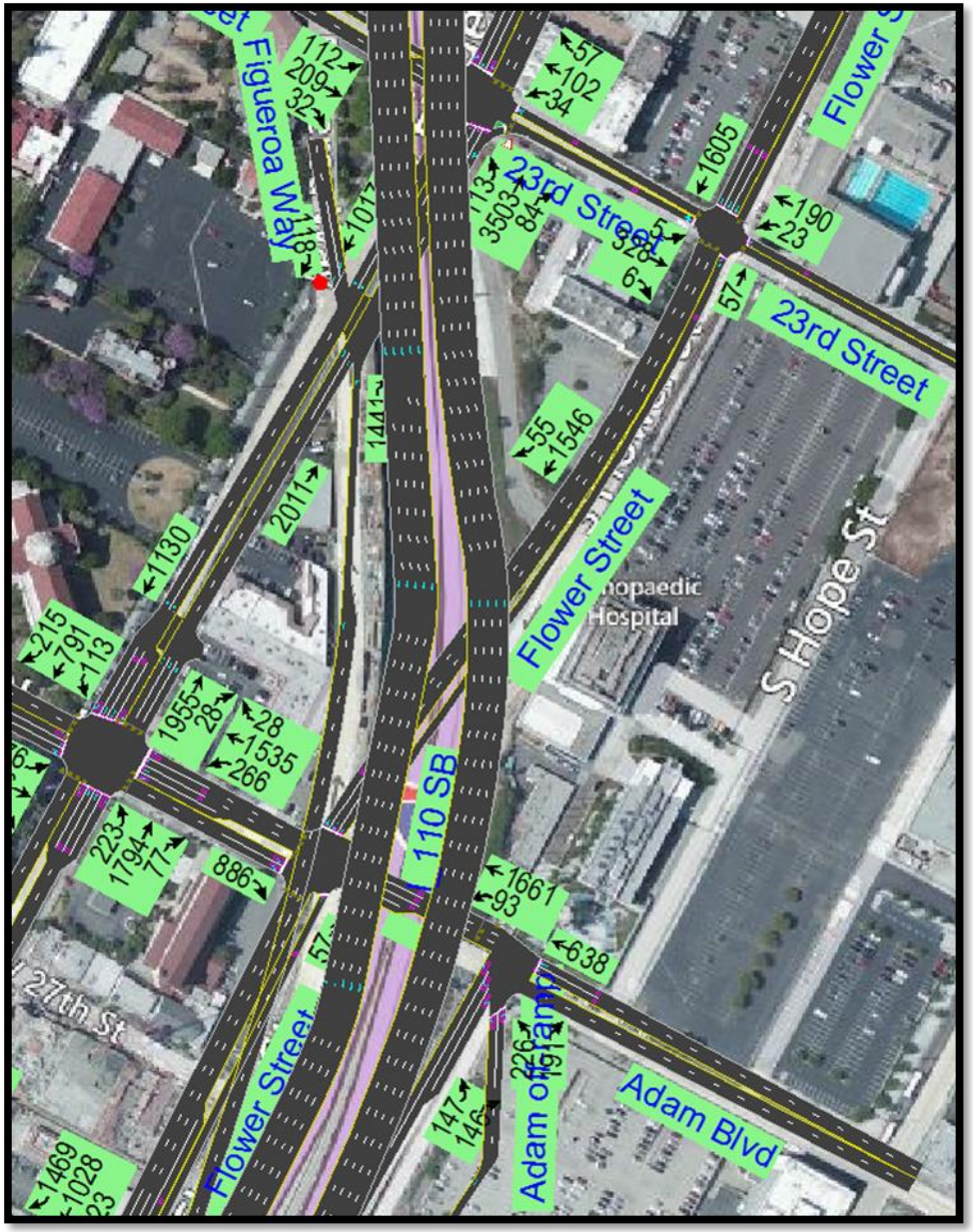
It is normal not to have same traffic distribution percentage for AM and PM peak hours. The varying traffic distribution between AM verses PM peak hour is mainly because of Staple Center and surroundings area trip attractions. Also, the balance of the network is taken under consideration.

Caltrans Division of Traffic Investigations concur that there is a mistake in the traffic report. The calculations and exhibit have been revised. The Level of Service improve from LOS = "D" to LOS = "C", and the average delay decrease from 39.7 to 26.0 sec., please see below the revised Table 4 and exhibit of the Traffic Report.

Table 4
2040 PM Peak Hour
Level of Service (LOS)

		2014			2040 (No			2040 (Build)*	
Intersection	#	Average Delay	LOS		Average Delay	LOS		Average Delay	LOS
NB I-110 off-ramp @ Adams Blvd.	8	131.4	F		197.8	F		~~39.7~~ 26.0	~~D~~ C
Flower St. @ Adams Blvd.	10	65.8	E		135.3	F		46.8	D
Figueroa St. @ Adams Blvd.	14	44.3	D		143.3	F		125.0	F
Figueroa St. @ 23rd St.	18	23.3	C		63.2	E		33.6	C

***MyFig project implemented.**


Figueroa Way
23rd Street
23rd Street
Flower Street
Flower Street
Flower Street
110 SB
Adam Blvd
Adam off ramp
S Hope St
27th St
112
209
32
118
1017
1441
2011
1130
215
791
113
1955
28
28
1535
266
223
1794
77
886
57
1469
1028
57
102
34
1605
190
23
57
13
3503
84
5
328
6
55
1546
1661
93
638
147
146
226
1914

Caltrans Division of Traffic Investigations concurs that enhancing capacity will often induce DMT's by encouraging drivers to use the new facility. However, adding capacity also enhances LOS and improves traffic flow, thus, reducing traffic delay, improving air quality, and improving accident rates. In the Traffic Study, Caltrans considered a 20% increase in traffic for future analysis, even though, MyFig Project will discourage some motorists to use the proposed ramp onto Figueroa Street. MyFig project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes (approximately 34%) by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

WAHA
West Adams Heritage Association

May 18, 2016

Ronald Kosinski
Deputy District Director
Garrett Damrath
Office Chief, Division of Environmental Planning
California Department of Transportation
100 S. Main Street, Suite 100 MS16A
Los Angeles, CA 90012

Re: Interstate 110 High-Occupancy Toll Lanes Flyover Project Draft Initial Study with Proposed Mitigated Negative Declaration/Environmental Assessment; SCH No. 2013021002

Dear Mr. Kosinski and Mr. Damrath,

Thank you for the opportunity for the West Adams Heritage Association to comment on the MND and IS/EA regarding the I-110 Flyover Transitway to Figueroa Way in the heart of historic University Park/West Adams. We are appreciative of the additional time granted to us and other consulting parties to review not only the circulated MND/IS/EA Document but also the additional files provide by Caltrans in a disk received from you on April 20, 2016
West Adams Heritage Association (WAHA) has been deeply involved in this project from its earlier inception in 1990, the Notice of Preparation in February 2013, and through the many steps of the Section 106 process. That long history of participation and comment positions WAHA as an expert witness to the undertaking, its various evolutionary phases and the adequacy of the MND/IS/EA.

As Mr. Kosinski noted at the February 23, 2016 Public Hearing on this undertaking, Caltrans assembled a multi-disciplinary team of people. WAHA has assembled a multi-disciplinary team to review the document and make comment. WAHA has assembled its volunteer experts in an effort to provide to you the most careful and well-reasoned comments on this proposed undertaking.

WAHA represents over three hundred households in the West Adams area of which University Park is the easternmost portion. The objectives of the West Adams Heritage Association include preservation of the area's architecture and culture. The above referenced project is located in one of the most environmentally sensitive Los Angeles neighborhoods, University Park. WAHA

joins with the many other stakeholders' concerns expressed by the Adams Dockweiler Heritage Organizing Committee, the National Trust for Historic Preservation, the Los Angeles Conservancy, St. John's Episcopal Cathedral, the California Preservation Foundation, Council Districts 1 and 9, the New Designs Charter School, the North Area Neighborhood Empowerment Council (NANDC) and other community groups, regarding this Project's impacts on this historic community.

The Importance of Objective CEQA Analysis

CEQA's intent is to provide objective factual data for decision makers so that a reasoned and supportable conclusion can be made. It "Insures a public citizenry that all of the environmental concerns have been evaluated."

We see no real factual support for the decision made in the Draft MND that:

...the proposed project would have no significantly adverse effect on: parks & recreational facilities, growth, environmental justice, relocations & real acquisitions (businesses/housing) Displacements, visual/aesthetics, paleontology, ground vibration, and cumulative impacts. JF 1

Finally the proposed project would have no significantly adverse effect on land use, community character& cohesion, traffic & transportation/pedestrian & bicycle facilities, cultural resources, water quality & storm water run-off, geology, soils, seismicity & topography, hazardous waste, air quality, noise natural communities, and animal species because the appropriate avoidance, minimization, and/or mitigation measure would reduce potential effects to insignificance."

In fact, the opposite is true. There is more than substantial evidence to support a fair argument that the project may have significant adverse environmental impacts. Therefore an MND/IS/EA will not suffice.

This determination of an MND is simply not borne out by the facts, not well-reasoned and not convincing, particularly in the light of the concerns expressed by the West Adams Heritage Association, Adams Dockweiler Heritage Organizing Committee, the National Trust for Historic Preservation and other community groups regarding this Project's impacts on important historic resources and the existing community; Caltrans finding of adverse effects; expert testimony at the February 23 public hearing; the continuing participation and providing of information by the consulting parties during the Section 106 review process; SHPO's finding of adverse effects. JF 2

Given the 1990 decision **to not build** an exit way north of 28th Street, it is surprising that staff from the very beginning has underestimated the community context and the impacts and complexity of the project. The project evaluation has been prejudiced from its inception when Los Angeles staff and headquarters concurred **with each other** – with no public input - that this was not a complex environmental review. JF 3

March 25, 2010 email from Dale Jones (Caltrans) to Allison Morrow and Garret Damrath (Caltrans)

'Based on the information below, this project does not meet the description of a complex Environmental Assessment under Section 6005. I concur that this project is a routine EA.

Under Section 6005, EAs have been divided into two categories: complex and routine EAs. Complex EAs are defined as those EAs that include multiple location alternative, debate related to purpose and need, strong public controversy, issues related to logical termini or independent utility, individual Section 4(f) determinations, complex Endangered Species Act issues, numerous cumulative impacts or high mitigation costs.'

JF 3

These 2010 judgments are unsupportable given the demonstrated: possible multiple location alternatives[1], debate related to purpose and need, strong public controversy, individual Section 4(f) determinations, and numerous cumulative impacts or high mitigation costs. It appears that the 2010 judgment was woefully incorrect. The basis for which, as stated by Caltrans Ms. Morrow, in the e mail.[2]

The project application for federal funding also was also skewed from the very beginning when the applicant for funding dismissed any possibility of community participation, context sensitive evaluations and possible context sensitive solutions. In their PID, the applicant stated:

JF 4

6. (c) Describe any community participation. ***(None were described)(my note)***
*Plans for this PID including how recommendations will be incorporated and/or addressed. Has a context sensitive solutions (CSS) approach been applied? Y___N X_* ***There is no need to apply a CSS approach.***
(d) How will the proposed transportation improvements impact the local community. Is the project likely to create or exacerbate existing environmental or other issues, including public health and safety, air quality, water quality, noise, environmental justice or social; equity Y___ N___ ***(This was left blank on the PID.)(my note)***

[1] Caltrans examined at least 13 alternatives which would have included multiple location alternatives but elected to provide only two in the draft MND/IS/EA. "we looked at 13 alternatives, as we finally came to the point where we have the ones we are explaining today.' Ron Kosinski, Public Hearing, Feb. 23, 2016

[2] The project is located in a highly urbanized are, and significant effects are not anticipated to occur. However, due to possible air quality impacts, the presence of environmental justice populations, and the presence of hazardous waste sites and cultural resource sites with the project area, we believe that an IS(routine) EA, most likely leading to a Negative Declaration/Finding of No Significant Impact, is the appropriate environmental document for the project. One National Register-listed property, St. John's Episcopal Church, is located in proximity to the project. There are no other 4(f) resources in the area. The freeway is depressed below ground in this area, and coupled with the lack of sensitive receptors in the area, construction of a flyover ramp or extension of the HOV viaduct will likely not have a significant visual impact. It is not anticipated that there will public controversy associated with the project. (Email to Dale Jones: A.Morrow)

This response is particularly questionable when ten years earlier there had been a public meeting sponsored by CRA and Caltrans to comment on a similar proposal to disburse traffic via a flyover ramp at 23rd Street. At that time, the elevated highway was around 24 feet at its highest, not the 54 feet in the current build proposal. This very early dismissal of the potential for impacts in the PID for the current project has been encountered at every step of the process, where the comments have been largely ignored to minimize the damaging effects of this proposal.

JF 5

The entire undertaking has suffered from a narrowness of vision and a lack of understanding as to the true context of the University Park/West Adams neighborhood and, in addition, what constitutes its historic resources. The report suffers from blinders and a perspective skewed to make an unacceptable project palatable. We strongly disagree that "*The project will be compatible with the existing visual character and of the project corridor.....The project was designed with the lowest possible profile...*" and the conclusion you make that "*it is as compatible as possible with the existing properties.*"[3] It simply isn't compatible. Your own drawings demonstrate this. And every comment made at the April 22, 2015 design meeting with the consulting parties conclude otherwise.

JF 6

Need for an EIR

We are troubled that Caltrans would issue an MND /IS/ EA, with its arbitrary conclusions that there is not a significant impact, given all of the comment by experts and stakeholders, including their own. It belies a prejudice to its earlier conclusions that this is a simple, not a complex environmental review and an unwillingness by the agency to respond to what is the process and the demonstrated record. The record does not show impacts will be mitigated to a level of insignificance and therefore an MND, as Caltrans proposes, is adequate. We also disagree that Section 4(f) under NEPA is not applicable here.

JF 7

CEQA provides a low threshold for requiring preparation of an EIR. There is more than a fair argument in the record that an EIR should be required. "*If there is substantial evidence of a significant environmental Impact, evidence to the contrary does not dispense with the need for an EIR when it can still be 'fairly argued' that the project may have a significant impact.*" (Friends of "B" Street v. City of Hayward (1980) 106 Cal.App.3d, 988, 1001; see also CEQA Guidelines § 15064.)

JF 8

It is particularly disturbing when Caltrans own environmental consultant is overridden by the Project Development Team (PDT). In a Caltrans "Memo to File" dated December 11, 2015, "Response to Cultural Resources Change in Level of Impact E-mail dated November 25, 2015:

JF 9

[3] Caltrans handout, February 23 Public Hearing

On November 23, 2015 Francesca Smith from Caltrans Cultural Resources Unit, submitted additional comments to the Cultural Resources Section of the IS/EA because SHPO did not concur with Caltrans Finding of Adverse Effects. .....
SHPO's comments were minor, but additional comments, ***which change the initial finding of less than significant with the incorporation of the proper avoidance, minimization and mitigation measures*** *were made by Francesca. She stated in the attached e-mail 'implementation of mitigation measures* ***will not reduce project effects to less than significant, and an impact on 4(f) resources will result from the project.****"*

JF 9

SHPO made comment, agreeing with Caltrans, that there is an adverse effect on St John's Episcopal Church. SHPO disagreed with Caltrans that there was no effect to the Parish House and found that there should be a finding of adverse effect to the Parish House. SHPO also disagreed with Caltrans and believed that there would be an effect on the Automobile Club, St. Vincent De Paul Church and the Stimson House, although it questioned whether that impact was minimal. Given these findings, it is untenable that Caltrans has chosen to dismiss its own finding, and SHPOs, and not prepared an EIR and Section 4(f) review.

JF 10

Subsequent to the SHPO's writing, Caltrans, SHPO and WAHA visited the site. We urged that the complexity of the setting be understood, rather than immediately dismissed by Caltrans as an "urban setting' therefore a fifty four foot high concrete massive flyway would not have impact. It can be argued that St. Patrick's Cathedral on Fifth Avenue in New York City is an urban environment. Does that mean building an "EI" within one hundred feet would not have an impact?

JF 11

Constructive Use

Caltrans has also arbitrarily dismissed constructive use as an issue here. As our consultant, Stephen Mikesell explained, "*To say that constructive use is "almost never used,*[4]*" however, is not to say that it is never used or that it cannot be used. Both FHWA and Caltrans provide guidance for making a finding of constructive use: See FHWA "4(f) Policy Paper," 2012, and Chapter 20 of the Caltrans Standard Environmental Reference (SER). The SER includes a useful "decision tree" for determining whether "constructive use" will occur on any given project."*

JF 12

"both the federal and state guidelines acknowledge that a constructive use may occur due to proximity impacts and that the visual intrusion posed by the flyway is precisely the type of impact that needs to be formally evaluated, using the guidance provided in the FHWA Policy Paper and Chapter 20 of the SER."

And attorney Jack Rubens, at the public hearing, "*with respect to the Section 4F, as you know*

[4] Caltrans handout, February 23, 2016 public hearing.

5 Section 4F states that this project cannot proceed if there is any prudent and feasible alternative to it. You circumvent that analysis by stating that this project would not use -- that's the term of art -- would not use St. John's Cathedral, but, in fact, the case law is very clear that physical impairment of the cathedral is not required and that the effect that this would have on the historic integrity of the cathedral mandates a true Section 4F analysis."

JF 12

Failure to Mitigate

Caltrans finds that the Project would have a significant impact on St. John's Church, but then assumes that a memorandum of agreement (MOA) with the State Office of Historic Preservation would mitigate these impacts to a less than significant level. This is improperly deferred mitigation. The mitigations that have been proposed [5] to be included in the MOA, do not mitigate the impacts of the massive flyover structure on the adjacent St. John's Church. CEQA clearly requires consideration of a project's impacts on the setting of an historic resource. The proposed mitigation measures have no relationship to the visual intrusion that would be introduced to the immediate setting for the two St. John's buildings. These mitigation measures do not support a conclusion that "the impact on the two historical properties will be less than significant."

JF 13

Conflicts with Modern Transportation Goals in Thinking

This undertaking was developed before any concept of the 'My Fig' project was proposed and approved. Hastily added language was inserted to associate this with the 'My Fig' project which takes great value of pedestrian friendly environments and various transportation modalities. "my Fig' focused on calming traffic on Figueroa south of Adams with no concern for shaving off seconds for the cars going down the street.

The other question is that Caltrans proposed, in their flyover development materials, to consider the green park space over the freeway project which the City and CRA was developing and yet there is no mention or consideration of that in the MND.

JF 14

While Caltrans denied at the WAHA/St. John's sponsored public meeting in December that Caltrans was not intent on increasing capacity at the Adams Figueroa exit, their own published information sheets say otherwise. While current discussion of transportation modality is making every effort to get people out of their cars, this entire project does otherwise. When entire City movements are extracting our environment from the damages of the car culture (for example, the

[5] "CEQA guidelines and best practices indicate that a mitigation measure must address the nature of the impact, if it is to mitigate that impact to a level that is less than significant. The substantial adverse change/adverse effect from this project to the two St. John's properties is related to the fact that it will "introduce visual elements that would be out of character and thus result in adverse effects." (p. 129) The proposed mitigation measures, while useful, do nothing to address the nature of the adverse effect. Stephen Mikesell comment letter, March 16, 2016

proposed revisioning of Pershing Square which has suffered greatly from the ascendancy of cars. Now efforts are being made to reverse this damage and to create again a real inner city park.) JF 14

The Need for the Project Cannot be demonstrated

We see that this undertaking is contrary to all modern thinking about how to create transportation modalities in great cities. The seconds that this may take off someone's wait in the queue cannot justify the fifty million dollars to move traffic two blocks. Ignored entirely is what happens when they get the cars off the ramp and position them on Figueroa and 23rd Street. This failure to evaluate what is really occurring with traffic in this neighborhood, is yet another narrow view and a complete failure to understand of what is really occurring if this is built.[6] JF 15

Environmental Justice

The lack of respect for urban inner city neighborhoods is nothing new. Freeways cut through poor and minority neighborhoods causing blight and creating less livable areas. Social justice in indeed an issue here. As CD 1 Senior Planning Deputy Gerald Gubatan noted in his testimony at the February 23 public hearing:

Air quality. My office disagrees with the determination of no impact... especially in light of the fact that the two immediately adjacent tracks are in the top 5 and10 percent of SB535 socioeconomic disadvantaged neighborhoods, which are highly pollutant communities.

In the 1960s West Adams experienced the 110 Freeway cutting through West Adams causing blight to a thriving African American community. The Flyover would "also serve to divide the West Adams neighborhood. The flyover would serve as a barrier to pedestrians who have safety concerns regarding walking under the flyover. Also, noise would be reflected and concentrated under the flyover structure, making a walk beneath extremely loud and unpleasant, deterring pedestrians."[7] JF 16

[6] Caltrans fact sheet to public officials stated: 2018, delay would be reduced from approximately 119 seconds per vehicle to approximately 18 seconds per vehicle at the Flower St./Adams Blvd. intersection during the AM peak when compared to the No Build scenario

–At the Figueroa St./Adams Blvd. intersection, delay would be reduced from approximately 135 seconds per vehicle to approximately 92 seconds per vehicle during the AM peak when compared to the No Build scenario....

By 2040, delay would be reduced from approximately 148 seconds per vehicle to approximately 19 seconds per vehicle at the Flower St./Adams Blvd. intersection during the AM peak when compared to the No Build scenario

–At the Figueroa St. /Adams Blvd. intersection, delay would be reduced from approximately 155 seconds per vehicle to approximately 117 seconds per vehicle during the AM peak when compared to the No Build scenario.

[7] California Preservation Foundation, Amy Minteer, comment letter of April 26, 2016

Caltrans own conclusion in *EA 27800 – Noise Report* (p.3) is that there is a significant noise impact that they cannot feasibly mitigate, a conclusion that would require an EIR, not an MND. JF 17

This earlier flyover proposal (which was 24 feet not 54 feet high) was found, by a consensus which included Caltrans, to be a terrible idea twenty six years ago. How can this iteration of a flyover again be put forward in the face of the City's adopted goals of intermodal transit and the creation of a great City no longer dependent on cars? JF 18

Conclusion:

The fact that DOT received sometime around 2010 a federal pilot project transportation grant should not prejudice decision-makers. We urge you to select the No Build Alternative. If you proceed with this undertaking, an EIR is clearly required. Based on the information contained in this letter, additional comments by the WAHA team and many others, and the administrative record (which includes the supplemental Caltrans EIR of 1990), we ask that you adopt the No Build alternative. Should you choose to proceed, a full EIR/EIS is required. JF 19

The assumption made by Caltrans staff that this is a simple environmental review, and that the only issue is public controversy, greatly underestimates the significant and demonstrated adverse effects the proposed undertaking will trigger.[8] The presumptions made in the MND/IS/EA are clearly questionable. We urge you commence a full, fair and impartial EIR/EIS. JF 20

In addition to these comments, we wish to add the following observations from the WAHA team:
Craig Fajnor, EcoTierra Consulting) – Traffic
James Childs, Preservation Consultant - Visual Impacts
Roland Souza, Preservation Restoration Specialist - Evaluation of the Context
Mitzi March Mogul, Architectural Historian - Environmental Impacts

Sincerely,

Jean Frost, Vice-President
West Adams Heritage Association
c/o 2341 Scarff Street, Los Angeles CA 90007
213 747-2526, indiejean@att.net

[8] E mail from A. Morrow (Caltrans staff) to Project Manager Sally Moawad, dated 2/23/2016: *We scoped this as an IS/EA, and HQ concurred with that determination, during the PEAR process a few years ago. I think Sally submitted that comment due to the Project Management continually referring to the document as an ND – not sure yet if the decision document will be an ND or MND. We have had a few public meetings with the one loud group (St John's Church and a few of the historic presrevationalists nearby) but I'm not sure "significant" public controversy is applicable here to elevate this to an EIR. That being said, if we needed to elevate those to an EIR/EA for the controversy only (we are not looking at significant impacts here), I think it would be doable without too much impact to the schedule.*

JF 1: The commenter's opinion is noted. Caltrans respectfully disagrees with the commenter's statement that they "see no real factual support for the decision made." Technical studies have been completed to support the findings of the environmental document and are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

Further, the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

JF 2: The commenter's opinion is noted. The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House and the Zanja are outside the boundaries of the established project area of Potential Effects as well as the Supplemental Area of Potential Effects (APE). No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

Further, no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Lastly, the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared.

JF 3: The commenter's opinion is noted. A Preliminary Environmental Analysis Report (PEAR) was prepared, which dictated the next level of documentation necessary. The PEAR provided the initial environmental evaluation of the project and alternatives. Based on the potential impacts identified, an Initial Study/Environmental Assessment has been prepared. The determination of whether a project is complex is determined by the potential impacts and concurrence is required by Caltrans Headquarters Environmental Coordinator. This determination does not require input from the public.

JF 4: The project initiation phase is the first formal project phase in developing a solution for a specific transportation problem. The project initiation phase is subsequent to the system and regional planning process. The outcome of the project initiation process is a project initiation document (PID) that establishes a well-defined purpose and need statement, proposed project scope tied to a reliable cost estimate and schedule. The PID is an engineering document or technical report that documents the scope, cost, and schedule of a project. The PID is an outcome of the project scoping effort. The PID is a record of the purpose and need for the project, and the approach that will be taken to meet or reduce transportation deficiencies. It is a record of the existing information, initial assumptions, identified risks, and constraints that drove the development of the project work plan. A PID is used to obtain approval for inclusion of a project into a programming document or to get conceptual approval of a project funded by others.

Although the PID document does not describe community participation, context sensitive solutions nor describe potential impacts on the community. The environmental document does consider potential impacts on the community as well as context sensitive solutions. Community participation included a Public Hearing held on February 23, 2016 to give the community an opportunity to provide their input on the proposed project.

JF 5: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated as the commenter suggests.

Below are the measurements of items that restrict the design and height of the flyover structure:

- Light Rail contact wire height 19 feet
- Light Rail Construction clearance 10 feet
- Space for safe scaffoldings and false work is about 10 feet
- Deck depth at the pick is 16 feet (close to Bent 6)

However, during the design phase of the project Caltrans will be able to search for possible new construction methods to cut down the maximum height, which would lower the grades.

The Project Initiation Document does not study potential environmental impacts, but potential impacts are studied in the environmental document. The remainder of the comment is considered the commenter's opinion and does not require a response.

JF 6: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

JF 7: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on

the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Section 4(f) protection is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

The remainder of the comment is considered the opinion of the commenter and does not require a response.

JF 8: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

JF 9: Ms. Smith's area of expertise is cultural resources not CEQA nor is her expertise in Section 4(f), therefore, her opinion was noted for the record, and addressed through a memo to file.

The PDT does not agree with Ms. Smith for the following reasons:

Section 4(f) protection is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project. The Section 4(f) determination has been agreed upon by HQ Environmental Coordinator Chris Flynn and HQ Section 4(f) expert Laura Loeffler per telephone discussion on July 28, 2015.

Further, the Historical Property Survey Report prepared for the project concluded that there is an adverse effect on Historical Properties within the project vicinity. Specifically a visual intrusion (under Section 106 Compliance), but a Memorandum of Agreement has be prepared in consultation with the State Historic Preservation Officer and after the avoidance, minimization, and/or mitigation measures are implemented the visual intrusion will be less than significant. In other words, the proximity impacts do not result in constructive use. Therefore, the provisions of Section 4(f) are not triggered.

Discussions with the Cultural Resources Unit Senior Kelly Ewing-Toledo, were consistent with the initial findings of less than significant impact on historical properties with the incorporation of the proper avoidance, minimization, and mitigation measures. Therefore, the Project Development Team does not believe that a "visual intrusion" is considered a significant impact that cannot be mitigated for. The Project Development Team believes with the incorporation of the proper avoidance, minimization, and mitigation measures this "visual intrusion" will be less than significant.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may have a significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

JF 10: The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Section 4(f) protection is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

JF 11: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

The remainder of this comment discusses a project in New York City and does not require a response.

JF 12: The commenter's opinion is noted. Section 4(f) protection is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit occurred with Caltrans and Consulting Parties, the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Further, the Section 4(f) determination has been agreed upon by HQ Environmental Coordinator Chris Flynn and HQ Section 4(f) expert Laura Loeffler per telephone discussion on July 28, 2015.

JF 13: In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

JF 14: The Project Development Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will compliment MyFig Project. Caltrans Division of Traffic Investigations concurs that enhancing capacity will often induce DMT's by encouraging drivers to use the new facility. However, adding capacity also enhances Level of Service (LOS) and improve traffic flow, thus, reducing traffic delay, improving air quality, and improving accident rates. In the Traffic Study, Caltrans, considered a 20% increase in traffic for future analysis, even though, MyFig project will discourage some motorists from using the proposed ramp onto Figueroa Street. MyFig project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes (approximately 34%) by converting an existing vehicle travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

The proposed project will not significantly impact 23rd Street nor adjacent streets trip distribution. With or without proposed project, the travel demand of northbound Figueroa Street approaching 23rd Street will approximately be the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Way. In summary, the proposed structure would bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location.

The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either

wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project, if you have any questions with respect to the MyFig Project, contact the City of Los Angeles.

Figueroa Way will be re-designed as a pedestrian and bicycle corridor (see Figure 21 of the environmental document). The re-design may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community. Further, a green space over the freeway was once proposed, but the City of Los Angeles decided not to adopt this idea as a project. Caltrans has been working closely with the City of Los Angeles and there has been no mention of the City's interest to adopt this green space over the freeway idea as a project. Therefore, it was not mentioned in the environmental document.

JF 15: The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated as the commenter suggests.

JF 16: The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance, and minimization measures throughout the project development and construction period. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or minority populations in the project study area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

Mr. Gubatan's disagreement of the air quality findings is noted. SB535's census track data has been received, and considered. This data does not change the findings of the community impact assessment nor the environmental justice findings.

The proposed project has a construction duration of approximately 2.5 years. Emissions from construction activities therefore are considered temporary pursuant to 40 CFR93.123(c) (5). During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to construction. With incorporation of the proper avoidance, and minimization measures summarized in Table 1 of the environmental document, potential air quality impacts will be minimized.

In addition to fugitive dust emissions, heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO2, NOx, VOCs and some soot particulate (PM10 and PM2.5) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to certain sensitive receptors, certain construction activities, e.g., extended idling, material storage, and equipment maintenance, would need to be conducted in areas at least 500 feet away from those sensitive receptors.

An individual project does not generate enough GHG emissions to significantly influence global climate change. Caltrans has taken an active role in addressing GHG emission reduction and climate change by creating and implementing the Climate Action Program, which was published in December 2006. One of the main strategies in the Department's Climate Action Program to reduce GHG emissions is to make California's transportation system more efficient. The highest levels of carbon dioxide (CO2) from mobile sources, such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour. To the extent that a project relieves congestion by enhancing operations and improving travel times in high congestion travel corridors GHG emissions, particularly CO2, may be reduced.

Alternative 2 will improve air quality in the future. Caltrans Office of Environmental Engineering (Air Quality Branch) has evaluated the proposed Build Alternative for operational and temporary construction impacts on the ambient air quality in the project vicinity. The carbon monoxide (CO) hot spot analysis demonstrates that the project meets conformity requirements. SCAG Transportation Conformity Working Group has concurred that the project is not an air quality concern for Particulate Matter (PM) 10 and PM2.5.There would be a decrease in emissions of some Mobile Source Air Toxics (MSAT) such as diesel particulate matters in 2023 and 2040 when compared to the base year conditions. MSAT emissions would likely be further reduced in the future due to implementation of future vehicle and fuel regulations by the Air Resource Board and the Environmental Protection Agency.

According to the Community Impact Assessment (August 2015), the proposed project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Commenter has not provided evidence to support the statement that the structure would divide the community.

Figueroa Way will be re-designed as a pedestrian and bicycle corridor (see Figure 21 of the environmental document). The re-design may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community. Therefore, permanent impacts to pedestrians and bicyclists are not anticipated as a result of the proposed Build Alternative.

The Los Angeles Police Department (LAPD) has jurisdiction of the project area. Policing and safety concerns should be communicated to LAPD.

Caltrans noise investigation found that future noise levels will be similar to the existing condition with the proposed Build Alternative. Refer to section 2.2.5 of the environmental document.

The remainder of this comment is considered the opinion of the commenter and does not require further response.

JF 17: Page 3 of the Noise Report is a project location map, therefore, the commenter's claim that on page 3 of the Noise Report states that there is a significant noise impact is not accurate. Caltrans noise investigation found that future noise levels will be similar to the existing condition with the proposed Build Alternative. Refer to section 2.2.5 of the environmental document.

Further, the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

JF 18: The commenter's opinion is noted. Below are the measurements of items that restrict the design and height of the flyover structure:

- Light Rail contact wire height 19 feet
- Light Rail Construction clearance 10 feet
- Space for safe scaffoldings and false work is about 10 feet
- Deck depth at the pick is 16 feet (close to Bent 6)

However, during the design phase of the project, Caltrans will be able to search for possible new construction methods to cut down the maximum height, which would lower the grades.

In 1990, the recommended alternative (Northbound HOV off-ramp to Figueroa Street and Southbound HOV on-ramp from realigned Flower Street, south of 23rd Street with the demolition and reconstruction of the Flower Street Overcrossing) was the main subject. Some of the primary features of the alternative were as follows:

- An elevated structure Bus/HOV transitway, an elevated HOV northbound off-ramp to Figueroa Street just south of 23rd Street, and an elevated HOV southbound on-ramp from a realigned Flower Street south of 23rd Street just west of the Orthopedic Hospital (2400 South Flower Street).

- The northbound HOV off-ramp structure would diverge from the mainline transitway and pass over the Adams Blvd. overcrossing, the southbound HOV on-ramp structure, and the realigned Flower Street overcrossing. Likewise, the southbound HOV on-ramp structure would pass over the Adams Blvd. overcrossing and merge the mainline transit way structure south of 27th Street.

There was considerable public opposition to implementing the recommended alternative. Some of the major concerns expressed by attendees were as follows: opposition to widening Figueroa St., circulation impacts due to the increased traffic, Figueroa St. becoming unsafe for pedestrians, harm to historic properties, noise impacts, air quality, aesthetics, and vibration impacts, opposition to the conclusions in the environmental document, earthquake impacts on structures, and lack of public involvement.
The meeting was adjourned with the understanding that Caltrans would develop other alternatives for the Northern Terminus proposal. After the open house/public input meeting Caltrans met several times with hospital officials, community groups, and the City of Los Angeles Department of Transportation (LADOT) to work out modifications to the design amenable to all concerned. Several alternatives were developed, but were later found infeasible. Another concern was voiced, when the Los Angeles County Transportation Commission (LACTC) was unable to make a firm commitment to a future Light Rail Transit Line on Flower St. This made it difficult for Caltrans and LACTC to develop a mutually usable design configuration for the Flower St. Bridge. Because of these issues and concerns, the design configurations were dropped from further consideration.

The mobility needs of the community has changed since the 1990's. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

The remainder of the comment is considered the opinion of the commenter and does not require a response

JF 19: The commenter's support for the No Build Alternative is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

JF 20: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

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The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Moawad, Sally F@DOT

From: Damrath, Garrett K@DOT
Sent: Tuesday, May 31, 2016 11:09 AM
To: Moawad, Sally F@DOT
Subject: FW: I AM AGAINST the Interstate 110 High-Occupancy Toll Lanes Flyover Project

Found another one.

Sincerely,

Garrett Damrath
Chief Environmental Planner
Division of Environmental Planner
Caltrans District 7

From: Andrew Yip [mailto:andrew.f.yip@gmail.com]
Sent: Thursday, February 25, 2016 4:00 PM
To: Damrath, Garrett K@DOT
Subject: I AM AGAINST the Interstate 110 High-Occupancy Toll Lanes Flyover Project

Mr. Garrett Damrath:

I am writing to voice my opposition to building the 110 Toll Lanes flyover. Tolls lanes per Metro's mission is to utilized excess freeway space that's already in existence. There's not need to spend 40+ million dollars to build a flyover so that cars in the toll lanes/HOV can get to a destination 30 seconds faster. I'm worried about the impact it will have to the community as well as the safety of our streets. Yip 1

--
Warm Regards,
Andrew Fung Yip

Cell: 626-203-9092
Email: andrew.f.yip@gmail.com

Yip 1: The commenter's opinion and support for the No Build Alternative is noted. The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease. The cost associated with this alternative is approximately $43 million, and the commenter's recommendation of not spending that amount of this project is noted.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated as the commenter suggests.

In Re Northbound Interstate 110)
High-Occupancy Toll Lanes)
Flyover Project Public Hearing)

PUBLIC HEARING

LOS ANGELES, CALIFORNIA

FEBRUARY 23, 2016

ATKINSON-BAKER, INC.
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REPORTED BY: KAREN GEER, CSR NO. 9781
FILE NO.: AA01279

In Re Northbound Interstate 110)
High-Occupancy Toll Lanes)
Flyover Project Public Hearing)

Northbound Interstate 110 High-Occupancy Toll Lanes Flyover Project Public Hearing, taken at 403 West Adams Boulevard, Andrew Norman Hall, Los Angeles, California, commencing at 6:15 p.m., Tuesday, February 23, 2016, before Karen Geer, CSR No. 9781.

A P P E A R A N C E S:

Bronwen Keiner

Ronald Kosinski

Khan Hossain

Allison Morrow

Members of the Public

I N D E X

PUBLIC HEARING PAGE
5

EXHIBITS

(None)

ALSO PRESENT: Azucena Puerta-Diaz, Spanish Interpreter

LOS ANGELES, CALIFORNIA

TUESDAY, FEBRUARY 23, 2016

--o0o--

MS. KEINER: All right. We're going to get started. Thank you so much for being here this evening.

We are here at the 110 HOT Lanes Flyover Project Public Hearing. And thank you very much for attending.

The purpose of tonight's public meeting is to share information with you about the project and to hear from you.

So my name is Bronwen Keiner. I'm the senior community relations officer with L.A. Metro, and I'll be your facilitator this evening.

Before we get started, I'd just like to send a great big thank you to the Orthopaedic Institute For Children for hosting us this evening. Thank you so much, Matt and Vicky, Michael Sullivan, Hilary Norton, and Donald Spenson (phonetic). We really appreciate it.

I'd also like to introduce your Spanish translator this evening, Azucena Puerta-Diaz. Please wave. And, Azucena, can you come up to the front please.

(The interpreter addressed public in Spanish.)

MS. KEINER: If you need translation assistance,

please speak with Azucena, and she can help you.

I'd also like to introduce Karen Geer. Karen is our court reporter who will be recording everything that is said at tonight's hearing.

So a little housekeeping. If any of you parked in the Lorenzo Building parking lot, at the end of the evening, when you exit, the gate will automatically open. So that will be your way out.

And this evening will begin with a brief presentation by Caltrans staff, and that will be followed by the public comment part of the meeting. So if you'd like to speak this evening, please turn in a speaker card. You can turn it in to me or one of the staff in the back, and you can also submit written comments. This is what the written comment sheets looks like.

So this is your forum. The time after the presentation will be devoted to the public comment, and as such the staff will not interrupt the hearing to make comments or clarifications.

Each speaker will be given three minutes to provide his or her comments, and we'll call you to the microphone in the order in which the cards were received.

So your comments will be recorded by the court reporter. So be sure to state your name very clearly for the record into the microphone.

And if you have additional comments, when your time is up, you're welcome to fill out a comment form. And if you have additional questions, project staff will be available here tonight until 8:00 p.m. to speak with you individually to answer those questions.

And as a reminder, the deadline for public comments is March 21st.

At this time I'd also like to recognize Bryce Rosauro with Councilman Price's office.

Bryce, I think you're wandering around. There you are.

Are there any other elected officials or their staff that are here tonight?

Yes.

MR. GUBATAN: Councilman Cedillo's office.

MS. KEINER: Councilman Cedillo's office. Thank you for being here.

I will now turn over the mic. to Deputy Caltrans Director of Environmental Planning Ron Kosinski who will provide an overview of the proposed project, of the agenda tonight, and the next steps.

Ron.

MR. KOSINSKI: Thank you very much. My name Ron Kosinski. I'm the Environmental Deputy for Environmental Planning with Caltrans, and we're here today to talk about

the possibility of extending the tollway and expressway through this area.

There's going to be three presentations -- myself; Kahn, the engineer, is going to talk about the engineering aspects of it and the general benefits of the project; and then Allison from my staff is going to talk about the environmental issues that were raised as we looked at this study.

Keep in mind we started working on this about 2013 on this specific series of alternatives. And we have a multi-disciplinary team of people. There are, obviously, a lot of engineers -- electrical engineers, traffic engineers, civil engineers -- involved in this effort. Then we have -- on the environmental side, we have biologists. We have social -- sociologists. We have visual analysis experts. We have cultural resource people, people who have degrees in architectural history.

And so it's -- when you think of CalTrans, you sometimes probably think of those are the people that are picking up the trash on the freeway. There's a lot more disciplines involved in these types of studies than you would think actually.

So we -- we -- through that -- through that period, the last two, three years, we've looked at a variety of options. We looked at 13 alternatives, and we

finally came to the point where we have the ones that we're explaining today.

The purpose of the meeting, as Bronwen mentioned, is to hear from you. That's the primary focus that we have here today.

We will have an overview, that I just mentioned, talk about the environmental process, and then go into the public comment period. That's really the purpose of the meeting as we identified in this slide here.

Let's switch to your concerns. And if you have to -- we're looking for your concerns as members of the community, and if you have specifics on the engineering that you'd like to talk about, that would be great. If you have issues about the environmental impacts and your perception of those impacts, that would be great.

And with that we're going to start right into presentation of the project.

So, Kahn, would you come up and tell us a little bit about the proposals that we have on the table here today.

Now, let me just say one more thing. No decisions are going to be made until late this year. We're going to be looking at what we hear today and may be altering the studies and analysis that we have. But no

decision is going to be made on what to do here until all of this project have been totally vetted through the very extensive CEQA process.

Thank you.

MR. HOSSAIN: Good evening. My name is Kahn Hossain of Caltrans Design. This is the project in addition to Freeway 110 and 10 and all the streets. In cooperation with Metro, Caltrans proposes to construct an elevated off-ramp structure between 30th Street and Figueroa Street in the City of Los Angeles.

The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard, I-110 northbound off-ramps to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street. And this project we are presenting, we're coordinating with City of L.A. to ensure compatibility with My Figueroa project.

Alternatives. As Ron mentioned, during the process, we studied quality and extensively 13 alternatives. Some of them involves structure. Some of them just only Adams Boulevard off-ramp. Some of them reconfiguration of lanes. Some of them even changing the signals. One of them even we put together reversible lanes.

But ultimately in our final analysis, we

1 came up with two alternatives, and we thought those are of
2 the viable alternatives which are -- meets the purpose.
3 One of them, alternatives, meaning no-build alternative no
4 physical improvements to the current freeway structure,
5 which would maintain the existing configuration of the
6 freeway, transitway, and off-ramps. Another one,
7 Alternative 2, which is called build alternative, a
8 two-lane flyover off-ramp connector structure,
9 approximately 1400 feet. The structure will connect from
10 the end of existing viaduct, the Harbor Transitway, to the
11 existing Figueroa Way. We're going to provide two lanes,
12 each 12 feet. We're going to provide 4-feet left shoulder
13 and 8-feet right shoulder. Each structure is standard
14 (inaudible).
15 The purpose of this project, to alleviate
16 congestion and reducing the queuing and delay on the HOT
17 lanes, Adams Boulevard off-ramp, and associated nearby
18 intersections, as for example, Adams Boulevard, Flower
19 Street, Flower Street to Figueroa Street, Figueroa to
20 Flower, Figueroa Street to 23rd Street.
21 Need. Termination of the northbound I-110
22 HOT lanes at Adams Boulevard presents a bottleneck, which
23 affects nearby intersections. We've had extensive talk
24 analysis in and around this area, and we found that,
25 because of that off-ramp at Adams Boulevard, it's

bottleneck intersection, in off-ramp, Adams Boulevard and other intersections. The existing northbound HOT lane at Adams Boulevard is a higher accident rate than average, which is a safety concern. So that's the need and purpose of the project.

Now I will turn it to Allison.

MS. MORROW: Good evening. I'm going to speak really briefly about the environmental review process of this project. The purpose of the draft initial study/environmental assessment that we wrote is to provide the public and decision makers with detailed information about the environmental effects of the project and also the measures we propose to minimize or mitigate the project impact.

So in terms of our environmental process, we begin our initiation of studies for the draft IS/EA back in January of 2013. We completed and circulated the draft environmental document for public review in January 2016. We are currently at the public hearing, and then we will go ahead and take all of the comments that we receive during the public circulation process and address those in the final environmental document targeted for probably around this summer.

So we looked at a lot of different topics in the draft IS/EA. I think some of the most relevant

here are probably community character and cohesion, traffic and transportation, and ped and bike facilities, cultural resources, air quality, and noise and vibration.

So some of our findings, there are traffic benefits associated with the proposed project that we do discuss in the IS/EA. I'm not going to go through this whole slide in detail. I believe we're going to put this PowerPoint on the internet for you guys to download so you can look at it in detail if you'd like.

The main take-away from this slide is probably that -- what we learned is that, with implementation of this proposed project, we can anticipate a five- to ten-minute per vehicle trip savings being projected for express lanes users exiting at the flyover during peak hours. We also expect time savings at the surrounding intersections including the existing Adams exit and decreased accident rates as well.

As for the Section 106 process, Section 106 of the National Preservation Act does require federal agencies to take into account the effects of undertaking on historic properties. So essentially the steps towards Section 106 compliance is -- the outline is ongoing in coordination efforts we've been doing with consulting parties and just parties -- State Historic Preservation officer, and it really provides a framework

for agencies to work with the consulting parties to determine the effects of projects on cultural resources and mitigation measures and so we can work with each other.

So some more of our findings in the draft IS/EA. And this lists aren't meant to be exhaustive. I would suggest, if you haven't looked at the IS/EA yet, please do so. We do -- we have found there are some impacts to ped and bicyclists using Figueroa Way as we do propose that it would be closed after construction of the flyover. Also an impact to the Metro bus stop located on Figueroa Way. A potential under Section 106 to -- for efforts affecting two historic properties, St. John's Cathedral Church and the Parish Hall.

Some visual -- I'm sorry. Not from visual impacts because the existing setting is urbanized and disturbed, and we are proposing that the flyover would be built and designed to fit the surrounding community.

And then some impacts to the water qualities -- having greatest impacts, construction at -- potential construction impacts having to do with air quality, noise, and potentially nesting birds.

So in response to these impact findings, some mitigation measures we are proposing include a redesign of Figueroa Way as it would be closed to traffic.

We would redesign it as a pedestrian/bicycle corridor.

We also have three possible measures to address impacts on historic properties. Those include an interpretive program, a mobile exhibit, and a potential streetscape to reflect the history of the West Adams district.

And also -- again we have three possible measures to address impacts on historic properties including an interpretive program, mobile exhibit, and streetscape to reflect the history of the West Adams District, and also preparation of our preservation plan for St. John's Church. And again this list isn't meant to be exhaustive.

So I'll turn it back over to Bronwen for the commencement of our public comments.

MS. KEINER: All right. Thank you, Allison.

So we will start the public comment period now. Thank you.

To create our protocol, if you would like to speak, please fill out a speaker card and turn it in to me. I will call each speaker to the microphone in the order in which the cards are received. So please come to the mic. when your name is called. Each speaker will be given three minutes, and the timer on the phone over here, Roheni's desk, will ring at the end of those three

minutes. Rohini is going to hold up a sign that will say one minute remaining so you can gauge your time.

As I said, if you have additional comments, you may fill out a written comment card as well, and these are due March 21st.

So please remember to state your name clearly into the microphone so the court reporter can capture all of your comments.

Mitzi March Mogul, you are our first speaker followed by Amy Minteer.

MS. MOGUL: Thank you. Mitzi March Mogul is my name. I'm a historic preservationist with 30 years of experience.

I'm not sure whether to address some of the ridiculous comments that were just made or stick to my prepared comments. I think I'll do the latter. I think the former speak for themselves.

Infrastructure projects such as roads are supposed to be amenities which improve life for people, not come at the expense of people. And let's be clear, lest you try to argue that this proposed L will improve conditions for those driving on it. Such improvements cannot be given to one group at the expense of another.

Many years ago -- and some of you may be too young to recall this -- hundreds of people lost their

Mogul 1

1 homes for a proposed Century Freeway which was never
2 built. South Pasadena has managed to keep a similar
3 project away for more than 30 years. When you still
4 develop and decimate the historic Route 66, taking
5 people's livelihoods and communities. And even New York
6 City dismantled its elevated system, realizing the
7 negative effects it had on people and communities. And
8 let's not forget the 10 Freeway, which was obsolete the
9 moment it opened.
10 Perhaps you need reminding that this L
11 will be built with the money of taxpayers, including those
12 in this room. I wonder whether you would think this such
13 a wonderful project if this were your neighborhood.
14 For years the government was dismissive
15 and disrespectful to this community. Though we are here
16 at all in improving our neighborhood is no thanks to them.
17 This project is just one more indication of the contempt
18 you have for West Adams and South Los Angeles. The
19 resources that would be impacted have proven themselves to
20 be of cultural significance and it officially recognized
21 St. John's, St. Vincent's, the AAA, Slauson House, the
22 Simpson residence, which by the way is a nunnery, Chester
23 Place and Mt. St. Mary's campus, et cetera. These places
24 have standing, and we insist on their protection.
25 I find it curious that, while one

Mogul 1

1 government agency is trying to promote mass transit and
2 low-impact bicycles and discourage automobile use, here we
3 have another agency apparently trying to promote
4 automobile use. I know this is the life of Caltrans.
5 Without it, you may become irrelevant. Perhaps you
6 already are.
7 Why don't you -- why don't you focus your
8 attention on maintaining the infrastructure that we
9 already have and do away with this ridiculous thing. You
10 are trying to justify something that cannot be justified.
11 MS. KEINER: Thank you.
12 MS. MOGUL: Your comments earlier were indeed
13 laughable.
14 MS. KEINER: Amy Minteer followed by Colin
15 Gibson.
16 MS. MINTEER: Amy Minteer, Chatten-Brown &
17 Carstens, and I'm here speaking on behalf of the
18 California Preservation Foundation who objects to the
19 impacts on the historic University Park and West Adams
20 neighborhood that this project would have. We believe
21 that an MMD is inappropriate for this project because
22 community members, historic preservation organizations,
23 and other experts have provided you with substantial
24 evidence this project may have significant impact on this
25 historic district and individual resources within it. We

Mogul 1

Minteer 1

1 believe that an EIR needs to be prepared to analyze
2 historic, noise, urban decay, and other community impacts
3 of the flyover.
4 And finally we question whether the
5 identified purpose for this project is proper in light of.
6 SB743. The purpose of this project is to improve the
7 level of service at several intersections, but SB743
8 requires traffic impacts be analyzed based on DMT instead.
9 The Office of Planning and Research has found that
10 projects proposed enhance capacity or otherwise produce
11 the level of service often induce DMT's by encouraging
12 drivers which is in direct conflict with the goal of the.
13 SB743.
14 Thank you.
15 MS. KEINER: Thank you. Colin Gibson followed
16 by Sergio Gutman.
17 MR. GIBSON: My name is Collin Gibson. I've
18 been a member of St. John's Cathedral now for 23 years and
19 also, for the same period of time, a member of its
20 cathedral choir. One learned commentator once said that
21 heaven is a place where all that is not music is silence.
22 And I submit that this project is likely to effect those
23 two values of sacred space, music and silence. We simply
24 have to have silence, or at least the best silence in an
25 urban environment, to serve as a background for music.

Minteer 1

Minteer 2

Gibson 1

1 The more you check out the surrounding noise, the less
2 dynamic range is possible in music. We have enough of a
3 freeway noise going on in the background. You can't
4 really hear anything, and that's too bad because you've
5 lost piano -- pianist, piano.
6 And I'd like to conclude by saying in the
7 frequently asked questions for this, there is a frequently
8 asked question, would there be an increase in noise
9 levels. And the answer to this strikes me as a little
10 odd. Future noise levels will predict -- were predicated
11 for design in 2014. The closest analyzed location to the
12 proposed structure being the cathedral at 514 West Adams
13 Boulevard.
14 Well, 2040 is something like 25 years out.
15 How can we say with any confidence what the noise levels
16 25 years out are going to be? I would submit to you that
17 all of these predictions are subject to assumptions. They
18 are models. They are imperfect. They're like the church
19 budget, and they're like the federal budget. They don't
20 necessarily work as intended, especially 25 years out.
21 MS. KEINER: Next we have Sergio Gutman followed
22 by Gerald Gubatan.
23 MR. GUTMAN: My name is Sergio Gutman. I live
24 in the area 65 years. I think I'm a little bit old.
25 And this project we believe -- I believe

Gibson 2

Gutman 1

that it's inappropriate for here. We have a lot of elderly people here. We have a lot of schools here in the area. And all those children and all the people that are coming in every day to leave the children with their cars and to pick them up, and it's a mess at the present time. With this it's going to create even a bigger problem. So I'm opposed, and a lot of my friends are opposed.

Thank you.

Gutman 1

MS. KEINER: Thank you. Next we have Gerald Gubatan followed by Mark Kowalewski.

MR. GUBATAN: Hi. Good evening. My name is Gerald Gubatan, senior planning deputy with the Office of Council Member Gil Cedillo, the first council district which represents the area kind of west of Figueroa and north of Adams Boulevard, commonly known as the University Park neighborhood, and so we're submitting today a comment letter, and I know March 21st is the final deadline. We may elaborate more following this.

Mr. Kosinski, thank you for the opportunity to come and provide comments in the proposed environmental document in connection with the I-110 High Occupancy Toll Lanes Flyover project.

Gubatan 1

My office is concerned that the proposed mitigated negative declaration is inadequate and suggest that a draft environmental impact statement, environmental

Gubatan 2

impact report should be prepared as a result of the failure to provide an adequate analyses of environmental impacts. The initial study determines which impacts shall be analyzed and the level of environmental review.

Gubatan 2

My office disagrees with the initial determinations in the following impact areas: Esthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, land use, planning, noise, public services, transportation, traffic. I would like -- and environmental justice.

Gubatan 3

I would like to offer the following general comments and make additional detailed comments prior to the March 21st deadline.

Esthetics. My office disagrees with the determination that the project will have no impact on esthetics. We believe that the project will degrade the esthetic character and quality of surrounding properties given the project's adjacency to several city designated historic monuments and historic resources located on Figueroa Street and Adams Boulevard. Historic Mt. St. Mary's University and University Park Historic Preservation overly zone.

Gubatan 4

Air quality. My office disagrees with the determination of no impact under -- oops. One minute. B, C, and E, especially in light of the fact that the two

Gubatan 5

1 immediately adjacent tracks are in the top 5 and
2 10 percent of SB535 socioeconomic disadvantaged
3 neighborhoods, which are highly pollutant communities.
4 Greenhouse gas emissions. The verbiage is
5 unclear and speculative. What type of analyses was
6 conducted with respect to potential impacts and climate
7 change? One cannot speculate on what analysis may or may
8 not have been conducted. Without the benefit of such
9 information, there's a failure to adequately inform the
10 public and decision maker relative to the potential impact
11 on greenhouse gas emissions.

Gubatan 5

12 Hazardous and hazardous materials. We'd
13 refer -- we don't agree with the less-than-significant
14 finding. There are multiple sensitive users in the
15 neighborhood of St. James Park, St. Vincent Elementary
16 School, and then accelerate the land use planning.

Gubatan 6

17 Missing is an adequate analysis of the potential impact on
18 land use plans governing the community for newly adopted
19 mobility plan which supercedes the 2010 bike plan, HPOC,
20 and existing oil drilling.

Gubatan 7

21 MS. KEINER: Thank you.
22 MR. GUBATAN: The transportation, traffic impact
23 and environmental -- it's elaborated here. We've attached
24 also SB535's census track data on the adjacent
25 neighborhood.

Gubatan 8

MS. KEINER: Okay. Thank you.

Next we have Father Mark Kowalewski followed by Daniel Ade.

FATHER KOWALEWSKI: I'm Father Mark Kowalewski. I am serving at St. John's for the past ten years. I'd like to invite those folks who have come from our community of St. John's to please stand with me.

St. John's has been a member of this community at this very location for 125 years. The church has benefited from the leadership of a series of pioneering clergy and congregational leaders who understood the role of this religious institution in stabilizing and providing spiritual care and services to a vulnerable and changing community.

Since 2008 we have enhanced our public role serving our five and a half county diocese as a gathering place for Episcopalians from throughout the southland. Over these many generations, we have served as a sanctuaryof tranquility and prayer. We have provided social services. We have spoken out for issues of peace and justice. And most of all, we have simply been present.

Our beautiful Romanesque structures standing out as a beacon, a park-like garden. This is a place enjoyed by people in our community as a refuge, but

Kowalewski 1

1 now people who have no understanding of our community have
2 proclaimed that this freeway ramp looming over our
3 cathedral will have no impact on us as a sanctuary in
4 stillness and peace.

Kowalewski 1

5 For them what matters is shaving off mere
6 seconds for commuters, and I dispute the fact that you say
7 it's minutes because we have been told it's only seconds.

Kowalewski 2

8 The plaza in front of St. John's and the
9 adjacent outdoor pulpit have been part of the streetscape
10 of Adams Boulevard since the 1920's. The pulpit has been
11 used to celebrate the coronation of British monarchs and
12 to protest the war in Vietnam. It is a unique feature of
13 our historic building. The plaza where we greet newly
14 married couples, where we find grieving families meeting
15 the caskets of their loved ones. It is a major staging
16 area for dramatic Palm Sunday precession, the place where
17 we gather for our Easter vigil, the most solemn event of
18 the year, a place where hundreds of Episcopalians gather
19 throughout our diocese.

Kowalewski 3

20 Building the flyover will present a visual
21 blithe to the beauty of that place in creating a noise
22 level that will drown out any voice from pulpit or plaza.

Kowalewski 4

23 We have met with the proposers of this
24 flyover on numerous occasions and have explained our
25 concerns in detail and yet have not received any response

Kowalewski 5

that is meaningful. Their proposed mitigations do nothing to substantially address our concerns. They have discounted and ignored everything we have said. The response we have received is frustrated, dismissive, and disrespectful. We hope for a better outcome as we continue this conversation.

Kowalewski 5

MS. KEINER: We're going to need to be a little quieter so the court reporter can capture these comments. Thank you.

FATHER ADE: Good evening.

MS. KEINER: This is -- can you state your name clearly.

FATHER ADE: I'm going to try.

MS. KEINER: Thank you.

FATHER ADE: My name is Father Daniel Ade, and I have also served at St. John's Church for the past ten years.

Ade 1

We are told that research has been done to determine that there will be either zero or negligible effects on the environment near the flyover. It is difficult to find the research addressing these issues, and we believe substantial negative impacts do exist. We believe insufficient research was done on traffic alternatives in particular with respect to the recent opening of Figueroa Way to traffic and conflicts created

Ade 2

1 between the traffic pouring off the freeway onto Figueroa
2 Street and the anticipated flow of bicyclists and
3 pedestrians on the narrower version of Figueroa Street
4 that's to be created by the My Figueroa Project.
5 A structure such as this will irrevocably
6 damage St. John's. Our site will no longer be a special
7 place. Rather it will be a remnant plot of land under an
8 overpass.
9 We understand the mandate to evaluate the
10 effects of this project in prescribed technical measures.
11 We are mystified how, through this process, Caltrans has
12 found no negative visual impacts when, in fact, the damage
13 to the very obvious beauty of our building and its
14 surroundings will remain for generations to come.
15 One of the most harmful impacts is the way
16 the flyover will divide this community. The fabric of
17 this community was torn apart when the 110 Freeway came
18 through the middle of it. At least that was placed below
19 street level. Now a far more significant threat will do
20 violence to our neighborhood. The flyover proposal will
21 bisect our community with visual blithe. It will further
22 draw a boundary between the University community to the
23 west and the poorer neighborhood to the east.
24 Our neighborhood is diverse and filled
25 with signs of life and vitality on both sides of the

Ade 2

Ade 3

Ade 4

Ade 5

1 freeway. St. John's is a bridge place of those
2 communities. We are not a wall-off place. Our church
3 seeks to serve all surrounding communities, and this
4 flyover will serve to further isolate those communities
5 from each other.
6 Other cities such as San Francisco and
7 New York now taking out poorly conceived freeways that
8 were imposed on urban centers. Instead of streamlining
9 traffic, they were found to cause blithe and segregation.
10 This flyover represents outdated thinking.
11 Let's collaborate on more creative, community friendly
12 21st Century solution.
13 One last thing, we were told by Caltrans
14 that all of this could be fixed by the spray painting of
15 our parking lot rain. That will not help. Thank you.
16 MS. KEINER: Next we have Jack Rubens followed
17 by Bryce Rosauro.
18 MR. RUBENS: Jack Rubens. I'm a land use
19 partner with Sheppard Mullin Law Firm on behalf of
20 St. John's Cathedral.
21 We have just started to dig into the
22 initial study, but it is clear from even a cursory review
23 of that document that it is fundamentally inadequate in a
24 host of respects and that the joint EIR/EIS is obviously
25 required for this project. I just want to highlight a few

Ade 5

Rubens 1

1 things to support that.
2 First, though I want to say that many of
3 the conclusions in the study are based on technical
4 reports that are not available to anyone at this point.
5 They're not attached to the initial study. They're not
6 available at the three libraries where you sent copies of
7 the initial study. They're not available online. And
8 because you tend to not summarize the evidence that's in
9 those reports or explain how you arrived at your
10 conclusions, literally no one reading this document can
11 really understand on what basis you're determining of the
12 project has no significant environmental effects.
13 The second enormous problem with the
14 document is that it's literally devoid of significance
15 thresholds. For those who don't know what that is, that's
16 the demarcation for when an impact becomes significant and
17 requires the preparation of an EIR. You don't have any of
18 those, and for that reason alone, your document is
19 fundamentally inadequate, and we're highly confident, that
20 on those grounds alone, if litigation is required here,
21 that a reviewing court would so find.
22 With respect to the substance, I think
23 it's fair to say that a great many of your impact analyses
24 are not supported by any credible evidence and fly in the
25 face of all of the testimony that you have been hearing

Rubens 2

Rubens 3

Rubens 4

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1 and are going to receive. Two examples, one historic
2 resources. You state in the initial study that this
3 project would, in fact, have an adverse effect on the
4 cathedral, which you seem to equate with there being a
5 significant impact from this project. If that is the case
6 then, as you probably know, without mitigation that
7 clearly mitigates that impact, an EIR is required. Your
8 mitigation consists of those three mitigation measures
9 that were read out a few minutes ago, and the reason that
10 the audience laughed when you said that, or when your
11 colleague said that, is because none of those mitigation
12 measures would have any effect at all on what this flyover
13 would do to the historic integrity of the cathedral and
14 the surrounding area. And for that reason, the mitigation
15 would not only -- clearly not be significant, it clearly
16 wouldn't have any impact at all; so you're left with a
17 significant historic resources impact.

Rubens 5

18 Second, with respect to esthetics for
19 those who haven't read the study, the analysis consists of
20 half page of impact analysis, and it ignores the cathedral
21 altogether and in one sentence states that the project
22 would have no impact on visual character because it's
23 located in an urban area.
24 Well, I think you've heard tonight and
25 continue to hear that that is not meaningful -- a

Rubens 6

meaningful explanation for finding that there's no adverse impact.

Rubens 6

Finally, if you'd allow me ten more seconds, with respect to the Section 4F, as you know Section 4F states that this project cannot proceed if there is any prudent and feasible alternative to it. You circumvent that analysis by stating that this project would not use -- that's the term of art -- would not use St. John's Cathedral, but, in fact, the case law is very clear that physical impairment of the cathedral is not required and that the effect that this would have on the historic integrity of the cathedral mandates a true Section 4F analysis.

Rubens 7

MS. KEINER: Thank you.

MR. RUBENS: Thank you.

MS. KEINER: Bryce Rosauro.

MS. ROSAURO: My name is Bryce Rosauro. I represent Council Member Price from Council District 9, and I want to echo some of the comments made by my colleague in Council District 1. We will meet informally at a later date, but the Council Member is concerned with the esthetics, the noise level, the vibration impact on historic asset, the cultural resources, that there isn't enough community benefit, not enough time savings to warrant the project, and that a formal EIR should be

Rosauro 1

1 prepared. And that's it. Rosauro 1
2 MS. KEINER: Thank you.
3 Next we have Shannon Gillis followed by
4 Mark F. Malan.
5 Shannon Gillis.
6 MS. COLLIS: Shannon Collis, C-o-l-l-i-s, and
7 I'm against the proposed project, and I believe that a
8 mitigated neg. dec. is not the appropriate level of
9 analysis and that feasible alternatives to this project
10 must be considered. Collis 1
11 Now, I find out tonight that there have
12 been 13 alternatives, and apparently those are not
13 available for review. But I believe, having seen the
14 proposed action, that the no-build or no-action
15 alternative is preferable. Collis 2
16 St. John's Cathedral is the spiritual
17 center for Episcopalians in a six-county area including
18 Los Angeles, Orange, Riverside, San Bernardino, Ventura,
19 and Santa Barbara counties. I, myself, am based in the
20 Antelope Valley, but as a lifelong Episcopalian, baptized
21 and ordained, and resident in the diocese of Los Angeles, Collis 3
22 I most certainly a stakeholder for the purposes of this
23 environmental analysis, and I ask, if there are any other
24 Episcopalians here from St. John's or otherwise, please
25 stand.

The type and level of impact that are reasonably foreseeable, both from construction and direct and permanent changes to the environment, force this proposed project into the EIR category. CEQA must consider cumulative impacts, and in this case they have simply glossed over the social, economic, historical, esthetic, and noise, air quality, and vibration impacts, just to name a few.

Collis 4

In addition, I am concerned that, because this is a joint mitigated neg. dec. EA document, that the potential use of federal funds, which I assume is the nexus here, would trigger the preparation of an EIS for no other than the controversy that this project will create?

Collis 5

Thank you.

MS. KEINER: Thank you.

Next we have Mark F. Malan followed by Lisa Davis.

MR. MALAN: It's Malan, M-a-l-a-n.

First of all, as a resident of this neighborhood, I agree with everything that everybody else has already said. So let me address some other issues so that we have something fresh to talk about.

Your outline in red section says that the purpose of this is to -- because of congestion and because of accident rates, you want to do this. You want to do

Malan 1

this to reduce accident rates, and you want to do this to reduce congestion.

Okay. Would that $43 million that you want to spend on this, would that have done better on the Expo Line to elevate it past the schools that it currently goes past? Would that $43 million have been better spent to elevate the Expo Line past the schools that it now travels past at ground level endangering the lives of those children? How many accidents have happened between those trains and cars because it's at ground level? Would that $43 million have encouraged more people from Long Beach to ride of the Blue Line by not having it stop at every single intersection on Washington Boulevard, make people want to take this roadway instead? Would that $43 million not be better spent on affordable housing closer to the city so people who don't have the money to spend on the toll road -- let's not call this a high occupancy because the majority of cars coming off of this don't have two people in them. They have one person, and they're paying for it. Would that money not be better spent on the people who don't have the money for the toll road to live closer downtown close to their jobs ride bicycles instead? It think it would.

So those are the kinds of things I want to ask you about. And kudos to you for not including in any

Malan 1

of your artist mock-ups the backlog of traffic from 23rd all the way across your overpass to the very end of the freeway, with all of that carbon gas just coming out of those cars and vehicles. That was very, very courageous of you not to include that. So please think of all those things when you want to do this.

Caltrans, itself, has admitted that widening the freeway is not the solution. Alternative transportation is the solution. Put this money into public transportation, not into a off-ramp for rich people from the South Bay to get into Downtown L.A. (Inaudible) from Pasadena to fly into Downtown Los Angeles has such a thing like this been proposed. It should be taken off the table, and you should find better uses for our money, all of our money, yours included, because if the state and the federal government is coming into this, it's your money too. There are better ways to spend money. Rich people can fly helicopters for all I care. They don't need a two-block off-ramp.

Malan 1

MS. KEINER: Thank you.

We want to capture all of your comments. So you have to be a little quieter while the speaker is speaking in the microphone so she can capture your comments. Thank you.

Next we have Lisa Davis followed by Jean

1 Frost.
2 MS. DAVIS: My name is Lisa Davis, and I'm going
3 to spend a little bit of my time addressing the forum here
4 this evening because I'm really disappointed that you
5 proposed to answer questions individually at the back to
6 each person rather than standing up front and giving all
7 of us your answers. Some of the answers to the questions
8 that Mark asked would be nice for all of us to hear rather
9 than giving the answers to one person. So I'm really
10 disappointed about that.
11 I'm a resident on 23rd Street. I was a
12 resident there in the '80s and have returned to be a
13 resident again. I'm concerned -- couple of my questions
14 that I would ask, and I hope that all of us can have the
15 answers to, it seems as if your proposing this flyover for
16 only the people who can afford to pay to be in the HOT
17 lane or the few that have more than two -- more than one
18 person and that you're alleviating their presence on Adams
19 Street for half a block. So is that true? It's the half
20 a blocking between the exit and Figueroa Way.
21 $43 million.
22 Now, I propose not spending it at all
23 rather than spending it on all kinds of other things.
24 Don't spend it.
25 So it appears as if Caltrans is treating

Davis 1

the symptom or a very small piece of the symptom. We're treating the symptom for the rich people who are traveling as quickly as they can through our neighborhood rather than all of us, rather than treating the cost. If we were to enforce pedestrian laws at the intersection of Figueroa and Adams Boulevard, traffic would -- traffic backup would reduce tremendously. We're being stopped because we can't make right-hand turns because people are walking against the light or left-hand turns because people are walking against the light.

Davis 1

In addition to that, there is a driveway at the strip mall at the northwest corner of Adams and Figueroa where only a car can exit or only a car can enter. Also that's traffic on Adams. Make it an exit only.

Davis 2

So I also am very concerned about the traffic that's going to end up going down 23rd Street because you're driving all of this traffic now down past Adams. If somebody wants to get to Interstate 10, they can no longer go down Adams. They're going to go down 23rd Street, which is a residential neighborhood. There's parking there because it's a residential neighborhood.

Davis 3

There are 53 driveways between Figueroa and Hoover and 15 sidestreets. So you can't drive down that street and not stop at least one time every time you

1 drive down that street, waiting for someone to paralegal
2 park, waiting for someone to get into their driveway
3 because there's a pedestrian walking across the front of
4 their driveway.
5 MS. KEINER: Thank you.
6 MS. DAVIS: It can't handle the extra traffic
7 that you're going to dump from the freeway onto 23rd
8 Street.
9 MS. KEINER: Thank you.
10 Next, Jean Frost followed by Jim Childs.
11 MS. FROST: Hi. My name is Jean Frost. I'm
12 vice president of the West Adams Heritage Association. We
13 have been participating as a consulting party to the
14 Section 106 process, and that process affirmed that there
15 are serious adverse effects and significant, significant
16 impacts. Caltrans' own October finding adverse effects
17 states so.
18 Needless to say, we are mystified at the
19 release of an MMD finding of no significant impact in
20 light of the document that the same organization has
21 acknowledged. Failure to pursue the 4F process when there
22 is more than substantial evidence in the record that there
23 are severe and unmitigable impacts is a real flaw in what
24 Caltrans is pursuing. There's a myopic view of a
25 bottleneck without understanding that you are moving

Davis 3

Frost 1

Frost 2

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traffic two blocks at a cost of $40 million to Figueroa and 23rd Street, an already challenging intersection. The project idea years ago was dismissed in 1990 when a relatively two-story flyover was proposed by Caltrans. At that time the environmental leaders of Caltrans said we're not going to affect this historic neighborhood. At that time they called us Adams Normandie, and actually I was one of the people that received an award from Caltrans for my work in the Star Preservation in this area.

Frost 2

So I endorsement of the -- all of the comments actually that have been said this evening, and the fact that this has come back to us in 2016 is really a travesty of all positive and current thinking in terms of how neighborhoods interact with transportation.

So I'm here to support a no-build alternative. And also the data in this report is highly questionable. I did read the visual impact report, and if you could find uglier pictures of my neighborhood, you would really be challenged. So much depending on where you stand and where you go play.

You need to do an EIR. More than that, you need to not do this project. It is simply not justified, and West Adams Heritage will strongly fight against this.

Frost 3

MS. KEINER: Thank you.

Jim Childs followed by Aaron Aulenta.

MR. CHILDS: Jim Childs, 2341 Star Street, neighborhood residents since 1978. I'm a historic preservation advocate, and I had the opportunity in 1990 to nominate St. John's as a historical monument, which it is. It's also listed on the national register.

And along with Jean Frost, I was involved in 1990 on stopping the proposed flyover then. We had a meeting right across Figueroa in 1990, and the community spoke, and Caltrans listened then. And in 1991 your organization issued a supplemental historical architectural survey report by Diane Cane.

In its conclusions -- I will read. It's a paragraph. In an open house public meeting held on May 3rd, 1990, the revised design met with extensive public concern. Consequently Caltrans modified the design concept and developed several other alternatives, including the current proposed presented in this report. Because this new design has been accepted by the surrounding community as less intrusive while still resulting in improved transitway operation and simplified construction procedures, it is Caltrans preferred alternative.

That's what the no build is. It was no build in 1990. And it needs to be no build in 2016. It

Childs 1

was a bad idea then and a bad idea today. And having fought for this and worked with Caltrans staff and, along with Ms. Frost, received an award, an Excellence in Transportation Award.

I don't normally like to read, but I just really can't help it. This is from your Department of Transportation written by Bill Coleman, deputy director, project development.

Dear Mr. Childs and Ms. Frost, it gives me great pleasure on behalf of Caltrans to congratulate you and your staff for the outstanding achievement in the development of the Adam Figueroa Historic District, which you people have overlooked. This project was recognized as the winner in Category 9, historic preservation, culture enhancement 1999, Excellence in Transportation Awards competition. The judges noted, with respect and sensitivity to the area's cultural, historic environment, this right-of-way project is an outstanding example of beauty and cooperation. The California Department of Transportation is proud to acknowledge the achievements of everyone whose professional talent, dedication, commitment to excellence contributed to our state's continued leadership in transportation system, design, development, maintenance, and operation. Please convey my congratulations to all those responsible for a job well

Childs 1

1 done.
2 Where is this Caltrans as opposed to the
3 Caltrans that I worked with?
4 Thank you.
5 MS. KEINER: Thank you.
6 Aaron Aulenta. Aaron Aulenta.
7 MR. AULENTA: Good evening. My name is Aaron
8 Aulenta. I'm here representing the Figueroa Corridor
9 Business and Improvement District, or BID. The Fig BID
10 has been in place since 1998 and is responsible for the
11 daily public space management of the Figueroa corridor.
12 Geographically the 110 Flyover Project falls right in the
13 center of Fig BID, will have a tremendous impact on our
14 district and stakeholders.
15 I'm here tonight to voice concerns we have
16 on the proposed flyover and the mitigated negative
17 declaration of the project. These concerns include a
18 physical barrier and dividing a vibrant neighborhood,
19 community in half. I have concern for 55 -- by creating a
20 physical barrier and dividing a vibrant neighborhood and
21 community in half. I have concerns for a 55-foot
22 structure and resulting visual impact on the community.
23 Concerns on the impact to adjacent businesses from --
24 changes in noise, light, traffic, esthetics, and privacy.
25 The windows of the 27th Street apartments are right across

Childs 1

Aulenta 1

Aulenta 2

1 from the structure. Concerns of impacts to the historical
2 structures like St. John's, St. Vincent's and the
3 Automobile Club. We have concerns over the impact on
4 Figueroa Street by increased HOT lane capacity to two
5 lanes, dropping traffic directly into Figueroa Street.
6 Concerns about the traffic and numbers that are not
7 comprehensive enough. There's only four intersections
8 that were analyzed for level of service in the study. We
9 have concern over the variables that were used in the
10 traffic simulation. For example, Figueroa Way not being a
11 scenario that -- in the no-build option. Concerns over
12 who would maintain and police the new areas created under
13 the flyover structure and the redesign of Figueroa Way.
14 Concerns about solving one issue while creating a whole
15 other set of issues in a couple blocks and spending a
16 significant amount of money to do so. Lastly, we're
17 concerned with the design configuration has been revised
18 from 26 years ago when it was shelved as a recommended
19 alternative over considerable public opposition and
20 similar concerns.
21 Our board will be discussing the project
22 in March and will consider taking a formal position to
23 opposed the project.
24 Thank you for the opportunity to speak.
25 MS. KEINER: Thank you. Next we have James, but

Aulenta 2

Aulenta 3

Aulenta 4

Aulenta 5

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before we go into James, I just want to announce we have more than 20 speaker cards left; so if we could really focus on capturing the comments for the next 45 minutes is when we've got Karen here until to capture these formal public comments, that would be great, and hold your applause until the very end, I would really appreciate it. Thank you.

Aulenta 5

James Wen followed by Irvelle Black.

MR. WEN: Good evening, staff of Metro and Caltrans. I want to thank you for inviting the community here. It's great that public service community works.

I know that it's difficult to hear comments that are sometimes such as these that bring passion into the community, and I want to thank Metro and Caltrans for being here to listen to those comments.

As I prayed upon this project, the thing that stood out to me, as it stood out to the community members, is that there were 13 alternatives. It would be interesting to find out what they are. But if any of them were something about something being underground, you might want to check that out. Some of the alternatives had to do with spilling the traffic in a Y. You might want to take a look at that. And then, lastly, if I could I have the parishioners of St. John's stand with me.

Wen 1

Earlier we suggested that Metro, Caltrans

Wen 2

1 maybe made some comments that were laughable, and perhaps,
2 though I'm not sure, they seem laughable, but I ask you to
3 listen.
4 To ignore and to build something that this
5 community thus far the comments -- the first probably 20
6 comments that have been heard have been against it --
7 would not be well advised. Sometimes when we ignore and
8 build things, they get torn down, and something that has
9 come to me is perhaps this particular project, if it were
10 built in this way, while the church would remain standing,
11 I'm not quite sure that the flyby would.
12 Thank you.
13 MS. KEINER: Next we have Irvelle Black. I'm
14 not sure if I'm pronouncing your name correctly. Sorry.
15 Followed by Roland Souza.
16 MS. BLACK: Sorry about that.
17 My name is Irvelle Black. I'm a member of
18 St. John's. And just looking at this really is
19 heartbreaking that anyone would consider doing that next
20 to a church of God. And I'd like to know, have any of you
21 been in the church? It is bad enough that, when we're in
22 prayer, a train goes by and blows its horn. You can't
23 hear. If you have that over us too, we might as well just
24 sit there and look stupid because we won't be able to hear
25 the word of the Lord, and I feel that that is a tragedy,

Wen 2

Black 1

and how in the world does that enhance the neighborhood? No way. It doesn't do it.

Thank you.

MS. KEINER: Thank you.

Next we have Roland Souza followed by Laura Meyers.

MR. SOUZA: Hi. My name is Roland Souza. I'm restoring a Victorian house, 1338 West 24th, just about eight blocks from here.

First I just want to say I echo what I've heard from my neighbors. I'm really touched and reminded how special this neighborhood is and this church and these historic landmarks are to all of us. It is exciting to be here.

I kept thinking why do I want to come here on a Tuesday night because I thought we fought this argument and won ten years ago about these kinds of walls going through our community. And I'm hoping we won't have to be here again ten years from now with the same issue being argued and spending another Tuesday night here.

But having said that, I'm very touched by the comments people have made.

Thank you.

MS. KEINER: Thank you.

Next we have Laura Meyers followed by

Black 1

Souza 1

Thomas Florio.

MS. MEYERS: I'm Laura Meyers. I'm speaking on behalf of the North University Park Community Association or NUMPCA. I have a couple of technical things, and I guess I have some passion.

Meyers 1

Technically -- you already heard this before, but I want to repeat. This proposed environmental clearance document is completely, utterly inadequate. It doesn't show any of the underlying source material. It actually has conflicts, and some of the source material that we were provided earlier, about a year ago, where you said the benefit was in terms of miniscule minutes. So in other words, people who are taking this HOV/HOT lane sometimes have to wait 30 seconds longer or maybe four minutes longer on an off-ramp than they might be able to have to wait if this were built. And that's only at a couple hours a day. So $40 million plus -- at this level plus the construction build-out to save some people a few minutes. So there's no benefit in our community for that.

Meyers 2

You haven't responded to many previous comments that I and others wrote when asked to comment. I find that a problem. And by avoiding doing an EIR, you never would have to respond to those comments. So part of the purpose of doing a full EIR is to actually take the comments and respond to the comments and any lower level,

Meyers 3

lower threshold of environmental, you don't have to.

The visual assessment purposely presented photos of blight rather than photos of our community that has been restored and is landscaped, and that is totally ridiculous.

Meyers 4

Seismic. I brought up a question at a meeting a year ago. How are you evaluating the sway factor on this up-in-the-air thing should an earthquake hit? Because we remember in Northridge the police officer on the motorcycle was killed when the bridge swayed and broke. What is the sway factor? In this document you only analyze whether or not there's a liquefaction factor. Somehow you concluded there isn't. Liquefaction, for those in the audience, means the dirt -- the ground below turns to sand. Can I remind you this was the riverbed for the L.A. River before they changed them out? So, of course, there's going to be liquefaction.

Meyers 5

Lastly, somebody on the Caltrans staff -- I'm not sure who because it's been a game of telephone -- when asked, "Why are you doing this? You're tearing a part a community," responded "We build highways. We don't build communities."

I'm sorry. We in this community are community builders. That is just how we're different from Caltrans.

Meyers 6

1 Thank you.
2 MS. KEINER: Next we have Thomas Florio followed
3 by Brett Shears.
4 MR. FLORIO: My name is Thomas Florio,
5 F-l-o-r-i-o. Address 833 West 23rd Street. I'm a board
6 member of NUMPCA.
7 I'm bewildered. I've been bewildered for
8 30 years, but I guess I always expect the best of people.
9 I tell you what some of that money could be used for
10 instead of building this thing is educate a staff, educate
11 the supervisors on what an impact is. I don't think they
12 would know an impact if they ran over one. I really
13 don't. I don't understand why you would even bring this
14 to the public at this level when it is so clear. You
15 think you're going to build this. Right after you build
16 the Pasadena Freeway extension, that's when you're going
17 to build this thing. The lawsuits are coming. The anger
18 of the public is coming. The politicians are going to
19 come after you.
20 I don't know what staff thinks. I don't
21 know how you people are trained. I don't understand.
22 CEQA is very clear what the law is on what the impacts
23 are. You have a national historic district here. You
24 have national monuments in the area. You have more
25 monuments on the corner, and you have done no studies on

Florio 1

any of those impacts.

There have been eight EIR's that have been done from the Staple Center to the Coliseum that shows the intersection you want to dump into is already at a state of apt, which means traffic, you can stay at the same light at least three times, and now you want to put more traffic into it.

Florio 2

You haven't even looked at the impact to University Park and St. James Historic District, and the problems we're already having with traffic on those -- in that area, but you want to dump the freeway traffic there without any mitigations of keeping the traffic off of 23rd Street, which is a residential street. It is not a throughway. We already have -- we've already lost four members of the community in the last two years because of traffic and rush hour is so insane.

And you people just don't have any training at all on what an impact is. Not environmentally, not noise, not pollution. You don't even look. You just -- the arrogance of it all, it's just mind boggling. I don't understand why your people are even here tonight. I don't understand how you can have the arrogance to show up with these blue suits sitting on the side listening to all of this stuff and as if we don't know who you are.

Florio 3

I mean who trained you people? Please go back to school and learn what an environmental impact is before you waste our time and attack this community again.

Florio 3

Thank you.

MS. KEINER: Brett Shears followed by Tracey from St. John's.

MR. SHEARS: I am Brett Shears. I'm the chair of the Policy Committee for the North Area Neighborhood Development Council. That's the area that -- that's the council that represents the impacted area.

At a meeting not too long ago, just a few days ago, that committee voted unanimously to oppose this project and to endorse the no-build option, and the rousing opposition that you hear today is the result of that -- in that vote, and I would hardily get every single one of the people who want this project for any reason on Caltrans to rethink that, not only based on what you hear today. I mean this is just the micro cause of the community. We've heard this over and over, and we've heard it for years. What we have just heard about the deaths in the area -- I'm a former resident here on 23rd Street, and I also have felt that impact. It's been really tough on me emotionally, and I know my neighbors as well.

Shears 1

This is, just in line with our reasoning,

terribly inconsistent with not only the community values, but just very basic initiatives we've had to be more pedestrian friendly, more bike friendly. This is not that. This is doubling down on a car culture that we have all agreed we should start moving away from.

So for that, please, please do the no-build option and, if we do go forward, environmental impact reports so we can see the consequences of a project like this.

Shears 1

Thank you.

MS. KEINER: Thank you. Next we have Tracey from St. John's followed by Terry Kim.

TRACEY: Faith is the substance of things hoped for, evidence of things not seen. Said it's not going to happen, but it's nice we showed up here tonight anyway. This can't happen. This church has saved me. So we're going to save this church.

That tree in the picture, if you would come to the church, you left out the concrete bench under that tree. At least once a week, I sit on that bench because in September I lost my job due to a merger, and I flew one way from Newark, New Jersey here to start over. And that tree and that bench is the only thing keeping me going right now, and I refuse to let anyone or anything take it away.

Tracey 1

Page 181 of that book back there on the table, that one book for all us people to look at, concerns me.

Tracey 2

This is a moment of silence right now for you to stop and think and know that this is more than just a building of bricks and mortar. This is a spiritual hospital for a lot of people in this community.

I'm in a shelter in a Highland Park, but I show up at 8:00 o'clock in the morning for service and stay until 11:00 o'clock service is over because this is my source of peace. You're going to take away a whole lot of peace if you do this. And I piggyback what my fellow parishioners said. The walls of Jericho came down, but to avoid that from happening, just don't let this go up.

Tracey 3

MS. KEINER: Thank you.

Next we have Terry Kim followed by Bishop Katherine Roskam.

MR. KIM: Actually I have a question, not a comment.

Can I speak anyway?

MS. KEINER: You can ask questions or state your comment, and then we are happy to speak with you afterwards as well.

MR. KIM: I'm just curious. What was the original project back in 1990?

Kim 1

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MS. KEINER: We'll record that question.

MR. KIM: Okay.

BISHOP ROSKAM: I'm the Reverend Katherine Roskam, and I'm bishop in charge of St. James in the City on Wilshire Boulevard. I represent -- a church which represents the people of Koreatown and also Hancock Park and various other areas in the city.

And in case you think there are other communities that don't care about this one, you're mistaken. And I'm here in solidarity with the people of St. John's and the people of this community.

I want to say that I was in New York during the time of Robert Moises. This project seems like a throw back to that era when cars and oil reigned and projects were built at the expense of some of the most culturally and ethnically rich cities in New York City. And you know what happened when the community and the Bronx were split for the I-95 approach to the George Washington Bridge? The South Bronx happened and all of the violence and poverty and degradation that went with the destruction of that neighborhood, and that was just one of many.

This project will destroy this neighborhood. But even if -- and another way, even greater than that is the consideration is that we're no

Roskam 1

longer in the 1950's. This is 2016. It's the 21st Century. Our tax money shouldn't be spent on this foley but on -- on such crucially needed public -- public infrastructure, the reclamation of water so that the groundwater can be built up again, the repair of roads that studies have shown are among the worst in the country, and the development of public transportation.

Let's not proceed with this foley at all. I support no -- no project.

Roskam 1

MS. KEINER: Next up, James Smith followed by Erik Knutzen.

MR. SMITH: I'm Jim Smith, and I'm with New Design Charter School. And we sit right on the corner of 23rd and Figueroa. We have 700 students, over 700 parents to come in and out every day. You talk about noise. You talk about traffic. You talk about all of the problems that this project will bring and the impact that it would have on our students as well as on the communities.

I don't understand this. I don't understand how a church can come forward and say this is wrong. I don't understand how people can stand up and give you diagrams after diagrams of information to show you that this is wrong. I don't understand how I can stand here and tell you that it's wrong and 20 other people done already told that you that it's wrong. Now I

Smith 1

stand here following them, telling you on behalf of 700 students, this is wrong. No build. Go home. Come back, no more.

Smith 1

MS. KEINER: Next Erik Knutzen followed by Robert Williams.

MR. KNUTZEN: My name is Erik Knutzen. I'm a parishioner at St. John's, and we are at an important point in the City of Los Angeles. Do we want to be known for our historic buildings, for our cathedrals, for our vibrant walkable and diverse communities, or do we want to be known for our Uber passes, for our off-ramps, for our traffic sewers.

Knutzen 1

As someone who also occasionally rides my bike to St. John's, I'm also wondering what it's going to be like when those new bike lanes go into Figueroa to ride across a freeway off-ramp. How safe will that be?

Knutzen 2

So I would tell the distant Caltrans bureaucrats reading this transcript, who aren't here this evening, to answer our questions. I would tell those distant leaders, quote, unquote, do not build this project. This community, this city does not need this project.

Knutzen 3

Thank you.

MS. KEINER: Next we have Robert Williams followed by Georgia Lee.

1 MR. WILLIAMS: I am Robert Williams, and I'm
2 canon for community relations for the Episcopal Diocese of
3 Los Angeles. I represent Bishop John Bruno who is the
4 bishop of the Sixth County Diocese this evening. Bishop
5 Bruno and the diocese leadership oppose this project
6 thoroughly. It is my own view that this flyover needs to
7 fly away right now.
8 St. John's has been on that property since
9 1890, serving the needs of this community. Those
10 buildings are not just pretty buildings to look at. What
11 makes them pretty is some of the architectural detail
12 which I'm going to provide to you in a nutshell.
13 The exterior is carved. That church that
14 you see looking right there, that view is carved. It is a
15 model of the 11th Century Church of San Pietro in Tuscany,
16 Italy. The interior -- if you've been inside St. John's,
17 you know the interior is a replica of San Miguel Basilica
18 in Florence. These are significant architecture
19 structures, and the list goes on in that particular
20 building.
21 We understand that there is a great need
22 for transportation relief in this city, but that flyaway
23 is not the answer. And for reasons articulated earlier
24 this evening, $43 million is better spent on some of the
25 more dire needs of the State of California.

Williams 1

I would also like to call to your attention that St. John's is not only an Episcopal church. It's a interfaith center where people of Abrahamic faiths, where people from the Hindu faith, the Buddhist faith, other faiths, and no faith at all congregate, and we can assure you of the opposition of these communities as well as the Episcopal community to this project. We are prepared to oppose it at every turn.

Again I suggest to you that this flyaway project -- I mean flyover project needs to fly away.

Williams 1

MS. KEINER: Thank you.

Next up we have Georgia Lee followed by Ruben McDowell, Jr.

MS. LEE: Hello. My name is Georgia Lee, and I have -- well, I was raised in this community. I have attended services at St. John's for more than 35 years, did my undergraduate at USC, and continue to live in this community, and I will tell you, I object strenuously to the categorization of this community as urbanized and disturbed. It's disturbed because of ugly crap like that. It's disturbed because of the train that goes through with no landscaping mitigation. This just adds insult to injury. Please no build.

Lee 1

Thank you.

MS. KEINER: Thank you. Next up is Ruben

McDowell, Jr. followed by Adrian Scott Fine.

MR. McDOWELL: My name is Ruben McDowell. I've lived here since 1987. I own a Victorian house on 23rd Street. And for the first comment I'd like to make is why this project has been resurrected when it was killed back in the '90s.

I was present at the meeting with the Caltrans and the city disembowel, and I was just so surprised that the traffic would disembowel 23rd, and now I know what it is. It's like cutting open a cake and nothing got spilled.

McDowell 1

Living on 23rd, I have watched the number of accidents, watched people been killed on 23rd. I have collected 200 signatures to look for additional signage on 23rd because of the traffic that is open by the fact that you solve this problem before not by having a flyover. By deciding that Flower Street would be a one-way street for people coming out of Downtown, and that destroyed all the small business on the street, and Figueroa will be a one-way northbound street, and that would solve the problem on 23rd. But that problem came back because someone opposed the use of Figueroa as a one-way northbound and people going home on Flower will not have time to go Downtown Motor to look at the latest expensive -- the Mercedes dealership insisted to make

1 contribution so Figueroa would not be a one-way northbound
2 street, and so it killed the hundred of thousands of
3 dollars spent for the study.

McDowell 1

4 So go back to the study, and where are the
5 11 projects that you eliminate without public hearings and
6 the EIR must take place because lots of people on 23rd are
7 effected.There are people being killed by the traffic.
8 There are drunk drivers driving all over there from the
9 different directions.The street -- that actually is a
10 collector street, and you have to find where it's at
11 because the people go off the freeway, shortcut to the 10
12 and be at Hoover. So to ignore the fact that it has on
13 pollution or noise and accident on 23rd is incomplete in
14 terms of the assessments of the project.

McDowell 2

15 Also the -- it just -- I mean what
16 happened to the hundreds of millions that you have spent
17 on public transportation to encourage people not to use
18 the freeway, and now you're going to develop a freeway
19 that encourages people to use it. And there is a hidden
20 agenda. A few days ago, the senator, they want to convert
21 the HOV lanes into multiple single use lanes. So this is
22 not a project for a few. This is going to be a massive
23 impact of pollution and traffic because the HOV lane,
24 which I use very much now, are going to be converted to
25 regular use lanes. That is being known publicly because

McDowell 3

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it was on 1070 with public officials encouraging that. So you must have an EIR, and you must look at the effect on the six schools allocated -- right next to 23rd Street.

McDowell 3

Look at the traffic accidents on Union, Hoover, 23rd because of this disembowelment of the traffic. This requires a 23rd Street study.

How about 23rd Street convert to bicycle only lane. I don't know if -- in 37 years I never heard Figueroa Way. Define Figueroa Way because Figueroa Street and Figueroa Avenue, those are terms I have used.

McDowell 4

So this is totally faulty. It's ignorant, and let's open up and 11 -- you eliminate them because somehow you think you know better.

Thank you.

MS. KEINER: Next up, Adrian Scott Fine followed by Sergio Alferez.

MS. FINE: Good evening. Thank you for the opportunity to comment. Adrian Scott Fine with the Los Angeles Conservancy. I'm here on behalf of our 6600 members. We're also a consulting party as part of Section 106 process, and we are definitely opposed to this project as it is right now.

Fine 1

I could echo a lot of comments that have already been said. I'll focus on a few of those.

I think what many of us are pressing for,

1 certainly what the conservancy is pressing for is a
2 meaningful and open public environmental review process.
3 That's what we need. That's what this project requires in
4 terms of this going forward. And that's both for the CEQA
5 process and Section 106 process and also the Section 4F
6 process. That's what we'll be pressing for as we move
7 forward.

Fine 1

8 We've been meeting and commenting on there
9 project for close to a year now, again as part of the
10 consulting party process. In October we concurred with
11 Caltrans' finding that there was an adverse effect as this
12 project, which makes it baffling to us to see now Caltrans
13 proposing an MMD as the preferred environmental route for
14 this process where we firmly believe, as you've heard from
15 others, there should be an EIR instead so it truly
16 assesses the impacts, looks at preservation alternatives,
17 and allows the public to fully comment and for those
18 comments to be responded to by Caltrans.

Fine 2

19 So for all those reasons, we disagree with
20 the analysis that's been put forward so far. The initial
21 study we believe to be flawed and inadequate, not
22 supported by substantial evidence -- or substantive
23 evidence. It also fails to assess the true impact that's
24 cannot be mitigated to a less-than-significant impact.
25 And it's in a wide range of areas from community

Fine 3

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character, visual, esthetics, culture resources, and noise and vibration.

I think at this point we strongly urge Caltrans to take a step back, reassess where it's at in this process, and if it chooses to go forward, that it moves forward by doing an EIR and looking at preservation alternatives.

Fine 3

Thank you.

MS. KEINER: Thank you.

Next up is Sergio Alferez followed by Sara Velas.

MR. ALFEREZ: My name is Sergio Alferez. I'm attend St. John's Cathedral, and I'm a lifelong resident of this district.

The proposed flyover structure near St. John's Cathedral is problematic for the following reasons: One, this neighborhood includes many historic structures. There are two major freeways crisscrossing the area, and the visual esthetics and structural integrity of that structure is threatened by pollutants, traffic, and Urban blithe, which follows when bridges, underpass, et cetera abound. Look no further than the Santa Monica Freeway, Interstate 10, between Figueroa and Santa Fe. The area has become a slum.

Alferez 1

The environment. Green spaces are all

1 going to be limited. Concrete, cement, asphalt, et cetera
2 tends to further efface shrubbery and vegetation.
3 Three, this church is historic. It is the
4 official working cathedral for the Episcopal Diocese of
5 Los Angeles. This diocese -- the structure has a
6 instructive effect on the visual presence of the building,
7 which could conceivably dissuade those who are seeking a
8 possible experience there.
9 Four, ethics. Is it correct or respectful
10 for civic life to pay for development and engineering to
11 such a degree that the spiritual and transcendent aspects
12 of civic life are impoverished. A city is more than a
13 mass of people living together in a conglomeration of
14 buildings. It also has spiritual, moral, and
15 philosophical dimensions which underlie human remediality.
16 This is a cathedral church, and any adverse effect on its
17 congregational life is detrimental to the spiritual life
18 of the whole city.
19 MS. KEINER: Next up, Sara Velas followed by
20 Sarah Rascone (phonetic).
21 MS. VELAS: Good evening. My name is Sara
22 Velas. I'm the family director of the Velas Lavasay
23 Panorama, which has been in the neighborhood for the past
24 11 years. Our focus is on entertainment popular for the
25 convention of the film. We're in the Union Theater on

Alferez 2

Alferez 3

24th Street. We currently collaborate with students from USC and the Orthopaedic Hospital Magnet School here, and I'm also a homeowner in the project area.

Like has been said so far, I disagree that a negative dec. is an okay thing for this situation, especially on the points of the visual esthetics, cultural resources, and noise and vibrations, and I fully support the no-build solution. If further exploration to this is done, we need to have a full EIR because the proposed mitigations are not enough.

Velas 1

This neighborhood has been cut through several times and in many ways is only kind of in the past several -- recent past is recovering from having this massive 110 built long ago in the mid century. Even just today -- so here's where sometimes these mitigations end up. Today in our beautiful, wonderful neighborhood, which was actually named the best in Los Angeles by Curve L.A. which is a nationally read publication. West Adams and University Park are very pedestrian friendly. So in sorting something out with the T-Mobile Company, I decided to walk to the store near the corner of Figueroa and Adams, and I took 21st Street. My home is on 21st Street. And approaching what would have been the pedestrian crossover the 110, this has been blocked off. So I just imagine these sort of like things that are said that are

Velas 2

1 going to help the situation and kind of take care of what
2 everybody's issues are going to be are going to end up the
3 same way that this pedestrian crossover has. You can't
4 walk that way. It's blocked off. And I just think
5 everybody's outlined the issues here so well. And we need
6 to stick with the no-build solution.
7 Thank you very much.
8 MS. KEINER: Next up is Sarah Rascone followed
9 by Hilary Norton.
10 MS. RASCONE: Sarah Rascone with the L.A.
11 Chamber and on behalf of the L.A. Chamber of Commence
12 which represents over 1600 organizations and 650,000
13 employees in the region. I'm here to discuss the
14 ramifications of traffic as well as our support for the
15 110 Adams Boulevard Flyover Project and the support of the
16 high occupancy toll roads, the HOT lanes, which have
17 actually gathered revenue for transportation projects, as
18 well as mitigated traffic.
19 The chamber supports this in Los Angeles
20 along with transportation alternatives which would relieve
21 congestion just as a proposed off-ramp would. Currently
22 at the intersection of Flower and Adams causes a
23 bottleneck in the amounts of traffic in the arterial. The
24 flyover propose would bypass the bottleneck, easing
25 traffic in the area. With like moving forward, making it

Velas 2

Rascone 1

a corridor with new bike lanes, the Adams Boulevard flyover would actually help make the highly congested intersection safer for pedestrians.

MS. KEINER: Let her finish please.

MS. RASCONE: Thank you. Extra lane riders, transit riders, and vehicle riders, according to what has been proposed. Therefore, the chamber supports Caltrans and Metro in their efforts to construct the elevated off-ramp that would be beneficial to commuters throughout the greater Los Angeles as well as transportation.

Thank you.

Rascone 1

MS. KEINER: Next up, Hilary Norton followed by Dustan Batton.

MS. NORTON: Hi. My name is Hilary Norton, and I'm the executive director of Fixing Angelenos Stuck in Traffic, and I would say that we listened respectfully to all of you who are speaking today, all of you who are saying that you are Christian, and I would just ask that professionals that are here and the people that are here to testify, we don't deserve to be booed.

UNIDENTIFIED WOMAN: You don't deserve the flyover.

MS. NORTON: So I'd like as part of -- I'd like as part of the testimony that we wanted to be here -- excuse me, ma'am. We wanted to be here to talk about the

Norton 1

1 people who are using this ramp that are not rich people
2 that are on the HOT lanes, that, in fact, there are 213
3 different buses that come every day along this corridor
4 with 6453 people coming, and that is not including the
5 people that are coming from San Pedro that are using this
6 corridor.

Norton 1

7 We are here to ask for a traffic study to
8 look at the better signalization around 23rd and at the
9 end of this ramp because we are concerned that, as more
10 vehicles come down this ramp, that there needs to be a
11 signal at the end and better signalization around 23rd and
12 Figueroa and that there should be a transit study, traffic
13 study, that includes the reduction in lanes due to My
14 Figueroa.

Norton 2

15 We're also here to say that we believe
16 that this should be analyzed with full EIR to look at the
17 historic nature, but, however, this is a dangerous,
18 dangerous area for pedestrians and cyclists, that there
19 has been -- just since October 2010 to September 2013,
20 five accidents have occurred with this off-ramp, and 15
21 have occurred in the general purpose lanes off-ramp.
22 We are moving more and more people who
23 want to come in to Downtown to have the job that they
24 need, and we are going to be moving more and more people
25 with the Expo Line.

Norton 3

This is an area that needs to have further analysis to be able to move people not by car but actually by -- as pedestrians, as cyclists, as transit riders, as bus riders, and we look forward to Caltrans' further analysis giving new conditions that have been spoken about today.

Norton 3

Thank you.

MS. KEINER: Thank you.

Dustan Batton followed by Nate Villaume.

MR. BATTAN: Good evening, staff members, Caltrans, and Metro, community members. My name is Dustan Battan, and I'm representing BizFed, the Los Angeles County Business Federation. We represent 275,000 employers and over 3 million employees across Los Angeles County, and we are here to express BizFed's continued support for the Metro Express Lane Program. The Metro Express Lanes Program has met the initial performance goals of travel time savings and express lanes and general purpose lanes, mode shifts, carpool and transit, access to commuters and reduction of greenhouse gas emissions.

Battan 1

Additionally, as it pertains to the 110 HOT Lanes Flyover Project, it is important to consider the following. The Adams Boulevard flyover will make the highly congested intersection of Adams Boulevard, Figueroa Street, Figueroa Way safer for pedestrians, cyclists, Expo

Battan 2

1 Line riders, transit riders, and vehicle riders.
2 Over a three-year period, between October
3 of 2010 and September 2013, five accidents with two
4 injuries occurred on the express lanes off-ramp, and 15
5 accidents occurred with six injuries on general purpose
6 lane off-ramps. Traffic often blocks the Expo Line and
7 travels at -- across Adams Boulevard, and more transit
8 riders, pedestrians, and cyclists will use L.A. Trade Tech
9 to the station once the Expo Line to service to
10 Santa Monica opens in the spring. The My Figueroa will
11 build protected bike lanes on Figueroa Street from MLK
12 Boulevard to 7th Street, which will remove two vehicle
13 lanes. The Adams Boulevard flyover will help make the
14 bike/vehicles intersection safer, especially if there is
15 could be a new signal where at the flyover and Figueroa
16 Street intersect. Metro Silver Line ridership has
17 increased from 89,683 trips per month northbound only in
18 November 2012 to 112,000 northbound only in November 2015.
19 Metro Silver Line service opening new
20 routes in San Pedro to Downtown L.A. in December 2015,
21 which will increase the number of buses and passengers
22 that will use Adams Boulevard Express Lane exit.
23 Finally, to echo what the prior speaker
24 just mentioned, 213 different buses carrying 6453 people
25 per weekday get off the Adams Boulevard exit, and the

Battan 3

Battan 4

Battan 5

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demand for additional travel by bus will grow as more people want to come to Downtown without a car. The flyover will provide easier travel for these buses.

And finally Metro's express lane has exceeded expectations for transponders sales, vehicle trips, and Silver Line ridership and demand is growing. Metro's express lane are a highly effective way to travel from LAX to Downtown destinations and hotels. 50 percent of all express lane travel going north on the 110 Freeway use Adams Boulevard exit. The Adams Boulevard exit is a concentrated accident area, and the flyover will bring more people by bus, carpool, vanpool, taxi, Zip Car, Lyft, Uber, Ride Share to Downtown without cars.

Battan 5

Thank you.

MS. KEINER: Thank you. Next up, Nate Villaume followed by Cynthia Marty.

Nate Villaume, are you still here? They have left.

Cynthia Marty.

MS. MARTY: Good evening. I'm Cynthia Marty. Do you like music? I'm a professional singer, and I've been blessed to be a soloist and member of the choir of St. John's Cathedral for eight years.

Music is a crucial component of worship. Many concerts, recitals, and recordings have occurred at

Marty 1

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St. John's. Some were under the Cathedral Arts Program and most recently included the Inner City Youth Orchestra of Los Angeles, which was a wonderful event. I'm sorry that you missed it.

I don't see how any of that could continue if this were built. Surely you would not want on the record that you stood in the way of arts creation in Los Angeles. To quote Don McLean, should this project be built, it would be the day that music died.

I also choose to drive 24 miles from my home to be a part of St. John's. Even when I'm able to carpool, this new flyover would be of no benefit to me, just brand new urban blight. I strongly urge that this be a no flyover zone.

I also would like to invite you to come visit and worship with us at St. John's. There are many people in this room who could tell you when it would be to your advantage to come. We have many services. I think it would be helpful for you to see what we do really well.

Thank you.

Marty 1

MS. KEINER: Thank you. This is our last speaker cards. Do we have any more speaker cards?

MS. CARTER: Well, you should. You should have one more. Mine.

MS. KEINER: Yours.

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MR. AZRIEL: Also myself here.

MS. KEINER: Come on up.

MR. AZRIEL: Good evening, everyone. My name is Yosef Azriel. I'm a longtime resident of University Park.

There were some eloquent arguments presented by the attorneys and various organizations. One of the main issues I have, is it logical to proceed forward with this project and the negative declaration that states that it may not enhance traffic flow to some degree. So I'm questioning whether or not we should go forward with that. I see no benefit.

The L.A. Chamber of Commerce and the gentleman here before us, the organization membership are supporting this, they do not live in our neighborhood. I can assure you, if those individual organizations and members were aware what is exactly is at stake here, they would oppose this project also.

On the record I do have a written comment, and I know we're going to be cut short because 8:00 o'clock is the cut-off time.

My position that it should be built -- should not be built whatsoever. It defies logic, and I believe it's just something that should have been -- it was killed 20 years ago, and there's no need to have it now. It does not fit our community.

Azriel 1

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Thank you.

MS. CARTER: Good evening. I certainly appreciate hearing my neighbors' comments. It's helped me even rethink the danger of this project as I sit here.

My concern has been focused on the little strip of 23rd Street between Figueroa and Hoover. You all know that that's a cut-through for the 10 Freeway, particularly the 10 Freeway going to the east side. I see that as a serious consequence of the problem because 23rd Street is totally inadequate and has -- we have our own accidents and our own deaths on 23rd, and it disturbs me greatly that it hasn't been considered in an EIR.

Carter 1

As far as moving the traffic down to 23rd and Figueroa, it seems like it's only moving the problem. I'm sure a lot of you can visualize the backup on that flyaway -- or flyover with all of the traffic that people have commented on tonight starting to use it. And I guarantee you, there will be people from those far right lanes who will cut across Figueroa to get on 23rd. If you want to talk about delays and accidents, just visualize that for a minute or two.

Carter 2

MS. KEINER: Two more comment cards. Isaac Stephenrej followed by Sarah Mawhorter.

MR. STEPHENREJ: Isaac Stephenrej, St. John's Cathedral. I'm fairly new to the cathedral. I've been

Stephenrej 1

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there for about a year, and I've listened to people say why they oppose this project. We have three people say as to why they like this project. I'm surprised that all the reasons as to why they should go are based upon just one -- just one factor, and that is just traffic alone.

But life is complicated. Decisions cannot be made just based upon traffic and just assume -- assumed benefits of traffic. There are -- this project is going to effect the cultural life, the spiritual life, and many other unintended consequences. For example, St. John's supports the homeless people of Los Angeles. Has any study been done to see what effects will this have on the work that St. John's does. I don't think that's been said, that's been discussed. And the people who propose this, I don't think we can make a decision just based upon traffic. Can we please look into all the effects of this project and the this project cannot proceed, and the no-build option is the only viable option.

Stephenrej 1

Thank you.

MS. KEINER: Thank you. Comment card, Sarah Mawhorter.

MS. MAWHORTER: Hi. I'm standing here as a member of St. John's and also as a urban planner. And we've heard so many comments today about the different impacts this will have. And when I'm hearing this, I'm

Mawhorter 1

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back in my urban planning class from my masters program where we talked about the projects in the 1950's and '60s. Others have mentioned this as well and the disasters that occurred in neighborhoods when a technocratic transportation engineer based approach is the only consideration and the community's needs and the community impacts for, you know, the next 60 to 100 years are not considered.

Mawhorter 1

So I would ask you to think not only of those transportation impacts, but the impact on the local community.

Thank you.

MS. KEINER: Thank you. Thank you very much. I'm going to wrap up by thanking everyone here tonight for attending and providing your input. As Ron mentioned, all the public comments made today will be considered by Caltrans. And remember that the public comment period closes March 21st. So if you'd like to submit a written comment form, please do so. Address to send it to is on the back, or you can hand it to the staff in the room tonight.

We're going to be posting a copy of this presentation on our website, as Allison mentioned, at Metro.net/expresslane. If you just click on public meeting to access the presentation.

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1 And it's 8:00 p.m. now. It's a little bit
2 after. If you have questions, project staff will be
3 available at the project boards to speak with you one on
4 one tonight. We really appreciate your attendance and par
5 for your participation.
6 Thank you very much.
7 (ENDING TIME: 8:00 P.M.)
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Mogul 1: The commenter's experience and opinions are noted. No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and the State Historic Preservation Officer (SHPO) concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

One of the mitigation measures in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community.

Minteer 1: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Based on a preliminary analysis of environmental conditions, the Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require

preparation of an EIR/EIS if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Minteer 2: The Traffic Study Report for this project was prepared in 2015. The analysis was based on adopted Highway Capacity Manual 2010 (HCM 2010). To date, Caltrans uses HCM 2010 methodologies to analyze and assess traffic impacts. However, Caltrans is in process of adopting the Demand Management Transportation (DMT) methodologies, but this transition requires training of staff.

Caltrans Traffic Investigations Unit concurs that enhancing capacity will often induce DMT's by encouraging drivers to use the new facility. However, adding capacity also enhances the Level of Service (LOS) and improves traffic flow, thus, reducing traffic delay, improving air quality, and improving accident rates. In this traffic study, Caltrans has considered a 20% increase in traffic for future analysis, although, MyFig Project will discourage some motorists from using the proposed structure. MyFig Project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicle travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

Gibson 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Gibson 2: The commenter's opinion of current noise levels is noted. The National Environmental Policy Act (NEPA) of 1969 and the California Environmental Quality Act (CEQA) provide the broad basis for analyzing and abating highway traffic noise effects. The intent of these laws is to promote the general welfare and to foster a healthy environment. The requirements for noise analysis and consideration of noise abatement and/or mitigation, however, differ between NEPA and CEQA.

CEQA requires a strictly baseline versus build analysis to assess whether a proposed project will have a noise impact. If a proposed project is determined to have a significant noise impact under CEQA, then CEQA dictates that mitigation measures must be incorporated into the project unless those measures are not feasible.

For highway transportation projects with FHWA (and the Department, as assigned) involvement, the federal-Aid Highway Act of 1970 and the associated implementing regulations (23 CFR 772) govern the analysis and abatement of traffic noise impacts. The regulations require that potential noise impacts in areas of frequent human use be identified during the planning and design of a highway project. The regulations include noise abatement criteria (NAC) that are used to determine when a noise impact would occur. The NAC differ depending on the type of land use under analysis. For example, the NAC for residences (67 dBA) is lower than the NAC for commercial areas (72 dBA). Please refer to Table 27 of the environmental document for Noise Abatement Criteria for both

interior and exterior noise levels, and Figure 40 lists common activities that will illustrate the noise levels.

According to the Department's *Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, August 2006*, or if the project is using the 2011 Noise Protocol *Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, May 2011*, a noise impact occurs when the predicted future noise level with the project substantially exceeds the existing noise level (defined as a 12 dBA or more increase) or when the future noise level with the project approaches or exceeds the NAC. Approaching the NAC is defined as coming within 1 dBA of the NAC.

If it is determined that the project will have noise impacts, then potential abatement measures must be considered. Noise abatement measures that are determined to be reasonable and feasible at the time of final design are incorporated into the project plans and specifications. The Department's *Traffic Noise Analysis Protocol* sets forth the criteria for determining when an abatement measure is reasonable and feasible. Feasibility of noise abatement is basically an engineering concern. A minimum 5 dBA reduction 7 dBA (for projects using the 2011 Noise Protocol) and is part of the reasonableness analysis in the future noise level must be achieved for an abatement measure to be considered feasible. Other considerations include topography, access requirements, other noise sources, and safety considerations. The reasonableness determination is basically a cost-benefit analysis. Factors used in determining whether a proposed noise abatement measure is reasonable include: residents' acceptance and the cost per benefited residence.

A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for additional information.

Gutman 1: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Gubatan 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Gubatan 2: The commenter's concerns are noted along with the preference of completing an EIR. The commenter stated that there was a failure to provide an adequate analysis of environmental impacts, but does not provide details of those failures.

Further, determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Based on a preliminary analysis of environmental conditions, the Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Gubatan 3: The commenter's disagreement with Caltrans initial determinations in the following areas is noted:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use
- Planning
- Noise
- Public Services
- Transportation/Traffic
- Environmental Justice

Gubatan 4: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

No direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

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Gubatan 5: The commenter's disagreement with the air quality determination is noted. The project study area is predominantly low income and/or minority populations, but no disproportionate adverse impacts to environmental justice populations are anticipated as a result of the Build Alternative. All potential impacts such as air quality impacts, noise and vibration impacts, water pollution impacts, hazardous waste impacts, community impacts, and traffic congestion (please see appropriate section in the environmental document for more details on type of impact and the type of measures that will be implemented) will be minimized with the implementation of avoidance and minimization measures throughout the project development and construction periods. No potential impacts have been identified as disproportionate because the percentage of low income or minorities experiencing any potential impact would not be higher than other members of the community.

Access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low income populations will be permanently negatively affected by the project.

Further, there are positive impacts (project benefits) resulting from the project, such as improving access to the surrounding land uses for various community members with various income, levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local businesses are also anticipated through improvements in circulation and safety which will encourage economic growth for both minority owned and non-minority owned businesses.

Climate change is a global issue and cannot be attributed to a single point source/location of Green House Gas (GHG) emissions. The goals for emissions reduction set forth by AB 32 have been set for the State of California and will be achieved at the State level and regional levels with a comprehensive approach, including methods of reducing emissions from all sources.

CEQA requires a lead agency to make a good faith effort to identify impacts and gives the lead agency discretion on the approach used to analyze impacts. Caltrans has used the best available modeling data (CT EMFAC) to analyze greenhouse gas emissions related to the project and have disclosed a projected increase in carbon dioxides (CO2) emissions. While there is no scientific data available to link a single proposed project to the global greenhouse gas effects on a cumulative scale to climate change, Caltrans is committed to reducing GHG emissions as outlined in the environmental document.

As provided in the Air Quality Analysis (dated September 2015) in support of the environmental document, greenhouse gas emissions impacts in terms of CO2 have been estimated and evaluated for the project during construction as well as during operation in years 2023 and 2040. Please refer to Table 5 (below) of the Air Quality Analysis (September, 2015) for estimate of CO2 emissions during construction and Tables 15 through 17 (below) for operational CO2 emissions in future years.

Table 5: Summary of Construction Emissions in lbs/day

	ROG	CO	NOx	PM10	PM2.5	CO2
Grubbing/Clearing	1.4	11.9	13.5	0.6	0.5	2,324.2
Grading/Excavation	10.6	80.4	109.2	4.8	4.4	17,057.3
Drainage/Utilities/Sub-grade	6.4	52.9	60.5	2.8	2.5	11,092.8
Paving	1.1	12.1	9.2	0.5	0.4	2,311.3
Maximum (lbs/day)	10.6	80.4	109.2	4.8	4.4	17,057.3
Total (tons)	3.2	25.4	32.0	1.4	1.3	5,337.6

Note: Calculation based on construction activities estimated by the project engineer.

Table 15: Comparison of GHG Emissions in 2014 (Existing) and 2023 (Opening) in tons/day

TAC	2014	2023			
	Exist. Ramp	No-Build	Build		
		Exist. Ramp	Exist. Ramp	New Ramp	Total
CO_2	0.856	1.031	0.197	1.078	1.275
CO_2 (Pavley)	0.784	0.73	0.14	0.762	0.902

Table 16: Comparison of GHG Emissions in 2014 (Existing) and 2040 (Horizon) in tons/day

TAC	2014	2040			
	Exist. Ramp	No-Build	Build		
		Exist. Ramp	Exist. Ramp	New Ramp	Total
CO_2	0.856	1.12	0.215	1.171	1.386
CO_2 (Pavley)	0.784	0.731	0.14	0.767	0.907

Table 17: Percent Changes in GHG Emissions in the Off-Ramps

TAC	2014	Opening Year 2023 (g/day)				Horizon Year 2040 (g/day)			
	Existing (g/day)	No-Build	Build	%Δ from Existing	%Δ from No-Build	No-Build	Build	%Δ from Existing	%Δ from No-Build
CO_2	0.856	1.031	1.275	49%	24%	1.12	1.386	62%	24%
CO_2 (Pavley)	0.784	0.73	0.902	15%	24%	0.731	0.907	16%	24%

Further, the proposed project has a construction duration of approximately 2.5 years. Emissions from construction activities therefore are considered temporary pursuant to 40 CFR93.123(c) (5). During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to construction. With incorporation of the proper avoidance and minimization measures summarized in Table 1 of the environmental document, potential air quality impacts will be minimized.

In addition to fugitive dust emissions, heavy-duty trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO2, NOx, VOCs and some soot particulate (PM10 and PM2.5) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site. In order to minimize the temporary exhaust emissions from the heavy-duty trucks and construction equipment adjacent to certain sensitive receptors, certain construction activities, e.g., extended idling, material storage, and equipment maintenance, would need to be conducted in areas at least 500 feet away from those sensitive receptors.

An individual project does not generate enough GHG emissions to significantly influence global climate change. Caltrans has taken an active role in addressing GHG emission reduction and climate change by creating and implementing the Climate Action Program, which was published in December 2006. One of the main strategies in the Department's Climate Action Program to reduce GHG emissions is to make California's transportation system more efficient. The highest levels of carbon dioxide (CO2) from mobile sources, such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 miles per hour; the most severe emissions occur from 0-25 miles per hour. To the extent that a project relieves congestion by enhancing operations and improving travel times in high congestion travel corridors GHG emissions, particularly CO2, may be reduced.

Alternative 2 will improve air quality in the future. Caltrans Office of Environmental Engineering (Air Quality Branch) has evaluated the proposed Build Alternative for operational and temporary construction impacts on the ambient air quality in the project vicinity. The carbon monoxide (CO) hot spot analysis demonstrates that the project meets conformity requirements. SCAG Transportation Conformity Working Group has concurred that the project is not an air quality concern for Particulate Matter PM10 and PM2.5.There would be a decrease in emissions of some Mobile Source Air Toxics (MSAT) such as diesel particulate matters in 2023 and 2040 when compared to the base year conditions. MSAT emissions would likely be further reduced in the future due to implementation of future vehicle and fuel regulations by the Air Resource Board and the Environmental Protection Agency.

Gubatan 6: The commenter's opinion is noted. It is likely that deep foundations will be employed for the new off-ramp structure. A Phase II environment site investigation will be performed in the Plans Specifications and Estimates Phase of the project (as stated in minimization measure HW-6) to characterize both soil and groundwater conditions and to establish a base-line condition for wastewater discharging compliance. Further, a project specific Lead Compliance Plan will be developed as stated in HW-2, which will minimize potential impacts. The proposed improvements consist of roadway and structure excavations at existing unpaved areas. Aerially Deposited Lead (ADL) soil may potentially exist at unpaved areas where it has been undisturbed in the past. Asbestos Containing Material (ACM) may be present in older bridge railing, utility conduits, drainage pipes, and shim plates. Avoidance measure HW-7 and HW-1 will minimize impacts.

According to Caltrans Headquarters (HQ) Lead Testing Guidance (June 2007), removal and installation of Metal Beam Guard Railing (MBGRs/MGRs), roadside signs (with wooden post), minor grading, curb & dike reconstruction, landscape & irrigation works are considered minor soil disturbance work. These tasks, where the soil will not be removed from the area of disturbance and waste will not be generated as defined in Title 26 of the California Code of Regulations (26CCR), the ADL variance will not be invoked. Treated Wood Waste (TWW) can occur as existing wooden posts for MBGRs and roadside signs are removed. These wood products are typically treated with preserving chemicals that protect against insect attack and fungal decay. These chemicals may be hazardous (carcinogenic). Avoidance measure HW-7, and minimization measures HW-3, and HW-4 will minimize potential impacts. The existing yellow thermoplastic traffic stripe and pavement marking will be disturbed/removed as part of the project improvements. Yellow thermoplastic traffic stripe and pavement marking contain elevated lead and chromium, which is regulated as California Hazardous Waste. Potential impacts will be minimized with the incorporation of HW-5.

According to Caltrans Right of Way Division and Caltrans Design, approximately 3 feet will be needed from two parcels to ensure sufficient space for maintenance, ingress/egress, access control, and setback purposes as well as emergency services access. The two parcels are businesses in a strip mall near the proposed project. Businesses will not be impacted by the acquisition of approximately a 3 foot sliver from the back of the properties. Therefore, the following parcels will be acquired for the proposed Build Alternative:

- Parcel # 80596-1 (APN #5124-027-015)
- Parcel # 80597-1 (APN #5124-027-017)

No relocations are anticipated as a result of the proposed Build Alternative. With the incorporation of minimization measure HW-6, potential impacts will be minimized.

Gubatan 7: Land use plans and findings were discussed in Section 2.1.1 of the environmental document. No change in land use is anticipated as a result of this project. With respect to the newly adopted mobility plan, this mobility plan was adopted on January 20, 2016, this date was after the Draft IS/EA (January 11, 2016) was approved. Further, this adopted mobility plan does not change the findings reported in the environmental document, but it is noted. HPOC is an unknown acronym, therefore Caltrans cannot respond to that portion of the comment. Lastly, existing oil drilling is outside of the project study area, therefore, is not discussed in the environmental document.

Gubatan 8: Attachment of SB535's census track data has been received, and considered. This data does not change the findings of the community impact assessment nor the environmental justice findings.

Kowalewski 1: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or environmental analyses in the environmental document.

Kowalewski 2: The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

Kowalewski 3: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or environmental analyses in the environmental document.

Kowalewski 4: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Kowalewski 5: The commenter's opinion is noted. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Ade 1: The commenter's opinion is noted. The environmental document summarizes the research conducted to determine potential impacts, as well as avoidance, minimization and/or mitigation measures. All technical studies that are referenced in the environmental document are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

Ade 2: The commenter's opinion is noted. The Project Development Team is working closely with the City of Los Angeles to ensure that the proposed Build Alternative will complement MyFig Project. The proposed project will convert the existing free flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project. If you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

Ade 3: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Ade 4: The commenter's opinion is noted. The Section 106 process determined that the proposed project will have an overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

According to the FHWA Guidelines for the Visual Impact Assessment (VIA) of Highway Projects (January 2015), visual quality is an aesthetic issue. Aesthetics is the study of perceptual experiences that are pleasing to people. Visual quality is, therefore, the experience of having pleasing visual perceptions. Although background and former experiences make each individual's experience of visual quality unique, human perception of what constitutes a pleasing landscape is remarkably consistent, not only within a society but, across cultures.

A viewer observing an existing scene has a range of available responses that are inherent to all human beings. The FHWA VIA guidelines recognize three types of visual perception, corresponding to each of the three types of visual resources.

- When viewing the components of a scene's natural environment, viewers inherently evaluate the *natural harmony* of the existing scene, determining if the composition is harmonious or inharmonious
- When viewing the components of the cultural environment, viewers evaluate the scene's *cultural order*, determining if the composition is orderly or disorderly
- When viewing the project environment, viewers evaluate the coherence of the project components, determining if the project's composition is coherent or incoherent

According to the FHWA Guidelines for the Visual Impact Assessment of Highway Projects (January 2015), the first phase of the FHWA Visual Impact Assessment process is the establishment phase. The purpose of this phase is to answer three basic questions, which are included below along with their answers:

1. What is the visual character of the proposed project?

As stated in the Visual Impact Assessment (April 2015), the elevated structure will be constructed of concrete and its form defined by crisp lines. Further, the use of texture on the outer bridge railing will be explored in the structure design phase. It is anticipated that the structure color itself will be natural concrete gray. This will match the existing structure. If color is to be used it would be in the way of possible light post or fencing, which will also be explored in the design phase. The composition of the structure and associated facilities will promote a uniform appearance with the existing structure and roadway.

2. Are there any legal directives or social constraints that dictate the visual quality of what can be constructed?

The west edge of the project area abuts the University Park Historical Preservation Overlay Zone. This designation seeks to protect and enhance the use of buildings, structures, natural features, and areas which are reminders of the City's history. Architectural treatment of the roadway, bridge, railings, and lighting should reflect the goals of the Historical Preservation Overlay Zone.

3. To what extent is the proposed project visible?

Viewer groups driving north on the HOT off-ramp would have views of the Downtown Los Angeles skyline in the middle ground. The Hollywood Hills and San Gabriel Mountains would constitute the background view. Views from the HOT roadway driving south in the middle ground would be of mid-rise building's rooftops and palm trees. Views of the background would be of rooflines from the University of Southern California campus. Viewer groups from the arterial streets from the west and east would see an elevated road structure. This is similar to the existing view from the terminus of the uncompleted HOT roadway at 28th St.

The existing landscape is manmade with ornamental vegetation and occasional street trees. The lay of the land within the corridor or project corridor is primarily flat and urban. The area is highly urbanized, and it is primarily a commercial area surrounded by some residential areas. According to the City's General Plan, the area is comprised of commercial, industrial, open space, and residential multiple family land use designations. Various types of building structures surround the project area, gas stations, strip malls, historical buildings, churches, and office buildings, which all make up the man-made visual resources. Single family residential units are sparse in the immediate area adjacent to the project location. The nearest single family residential area is approximately a quarter mile to the west. There are several historical buildings near the proposed elevated structure which are mapped in Figure 30 of the environmental document. The historic buildings include the Auto Club of Southern California (pictured in Figure 31 of the environmental document), St. John's Cathedral Episcopal Church (pictured in Figure 32 of the environmental document), St. Vincent Catholic Church (pictured in Figure 33 of the environmental document), and Thomas Stimson House (pictured in Figure 34 of the environmental document), but none of the buildings will be directly impacted by the project.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Ade 5: The commenter's opinion is noted. According to the Community Impact Assessment (August 2015), the proposed project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. The commenter has not provided evidence to support the statement that the structure would divide the community.

Access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons. There are no disproportionate impacts anticipated to low income and/or

minority populations in the Project Study Area. Also, the project will not separate minority or low-income populations from the rest of the community and no services that target low-income populations will be permanently negatively affected by the project.

Further, there are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Rubens 1: The commenter's opinion that the Draft IS/EA is "fundamentally inadequate" is noted. It is considered the commenter's opinion that a joint EIR/EIS is required. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS be prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Rubens 2: The environmental document is a summary of technical studies that support the findings found in the environmental document. Technical studies are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov). Technical studies are not required to be attached to the environmental document. It is the commenter's opinion that the technical evidence is not summarized in the Draft IS/EA to support a finding of no significant environmental effects.

Rubens 3: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

Lastly, the existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence to justify the preparation of an EIR.

Rubens 4: The commenter's opinion is noted. Caltrans respectfully disagrees with the commenter's statement that the "impact analyses are not supported by any credible evidence." Technical studies have been completed to support the findings of the environmental document and are available upon request by contacting Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov).

Rubens 5: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Also, the existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence.

It is considered the commenters opinion that the mitigation measures do not mitigate the potential impacts to historical properties. In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Rubens 6: According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Rubens 7: Section 4(f) protection is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Rosauro 1: The Councilmember's concerns are noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or environmental analyses in the environmental document. It is considered the commenter's opinion that a joint EIR/EIS is required.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Collis 1: The commenter's opposition to the project is noted. It is considered the commenter's opinion that a "mitigated negative dec is not the appropriate level of analysis". The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The Project Development Team determined that the appropriate environmental document level is an Initial Study/Environmental Assessment. After careful consideration of all potential impacts and avoidance, minimization, and mitigation measures, the notice of intent to adopt a mitigated negative declaration was prepared. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity (for additional information on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Alternatives have been considered (see section 1.6 of the environmental document), and the proposed Build Alternative is the alternative that meets the purpose and need of the project and is feasible. Commenter has not provided any feasible alternatives to consider; therefore, no further response is required.

Collis 2: The thirteen alternatives include elven (11) alternatives that were considered, but eliminated from further consideration, and can be found in section 1.6 of the environmental document. The remaining two alternatives are the proposed Build Alternative and No Build Alternative. The commenter's preference of the No Build Alternative is noted.

Collis 3: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Collis 4: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Further, the existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment.

Cumulative impacts have been considered in section 2.4 of the environmental document. Caltrans respectfully disagrees that cumulative impacts were "glossed over" as the commenter states. Caltrans has followed all applicable guidelines, laws, and regulations.

Collis 5: Because a project would potentially use federal funds, it does not automatically trigger the preparation of an EIS. Under NEPA, significance is used to determine whether an EIS, or some lower level of documentation, will be required. NEPA requires that an EIS is prepared when the proposed federal action (project) *as a whole* has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. The existence of public controversy over the environmental effects of a project will not require preparation of an EIS if there is no substantial evidence that the project as a whole may significant effect on the quality of the human environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment. The proposed project does not significantly affect the quality of the human environment, therefore, an EIS is not necessary.

Malan 1: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Buses will be able to use the flyover to get passengers to their destinations. There are currently 213 transit trips/weekday that travel on the NB I-110 Express Lanes and exit at Adams Blvd. Metro Silver Line ridership has increased from 89,683 trips per month (Northbound only) in November 2012 to 112,102 (Northbound only) per month in November 2015.

Transit Provider	Average Weekday Ridership (Nov 2015, NB only)
Metro Silver Line	4,662
Metro Line 450	577
Gardena Transit	355
LADOT Commuter Express	634
Torrance Transit	107
Orange County Transportation Authority	118
Total	6,453

The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Davis 1: The first portion of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

The proposed structure will not be limited to individuals who can afford to use the HOT Lanes only. Buses will be able to use the flyover to get passengers to their destinations. There are currently 213 transit trips/weekday that travel on the NB I-110 Express Lanes and exit at Adams Blvd. Metro Silver Line ridership has increased from 89,683 trips per month (Northbound only) in November 2012 to 112,102 (Northbound only) per month in November 2015.

Transit Provider	Average Weekday Ridership (Nov 2015, NB only)
Metro Silver Line	4,662
Metro Line 450	577
Gardena Transit	355
LADOT Commuter Express	634
Torrance Transit	107
Orange County Transportation Authority	118
Total	6,453

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

The cost associated with this alternative is approximately $43 million. The commenter's recommendation with respect to not spending the $43 million is noted.

Lastly, Caltrans does not have the authority to enforce pedestrian laws.

Davis 2: The commenter's opinion is noted. Caltrans does not have the authority to address this issue due to the fact that this issue is on private property. Because this issue impacts city streets, the City of Los Angeles may be able to help address this issue by working with the property owner.

Davis 3: The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. No potential new significant traffic impacts at the intersection of Figueroa Street and 23rd Street are anticipated. 23rd Street and adjacent streets are local city streets, the City of Los Angeles should be contacted for complaints or concerns.

Frost 1: The first portion of this comment does not raise an environmental issue within the context of CEQA and/or NEPA. The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment.

With respect to Section 4(f) protection, it is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project.

Frost 2: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. 23rd Street and adjacent streets are local city streets, the City of Los Angeles should be contacted for complaints or concerns.

The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or environmental analyses in the environmental document.

Frost 3: Commenter's support for the No Build Alternative and opinions are noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established threshold of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists. The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. No evidence has been provided, which would justify elevating the environmental document to an EIR.

Childs 1: The first portion of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Section 2.1.5 of the environmental document, indicates that Caltrans held an open house/public input meeting on May 3, 1990. This meeting was held because of local concerns following the circulation of the I-110 Transitway Northern Terminus to Adams Boulevard Initial Study/Environmental Assessment.

The recommended alternative (Northbound HOV off-ramp to Figueroa Street and Southbound HOV On-ramp from realigned Flower Street, south of 23rd Street with the demolition and reconstruction of the Flower Street Overcrossing) was the main subject. Some of the primary features of the alternative were as follows:

- An elevated structure Bus/HOV transitway, an elevated HOV northbound off-ramp to Figueroa St. just south of 23rd St., and an elevated HOV southbound on-ramp from a realigned Flower St. south of 23rd St. just west of the Orthopedic Hospital (2400 South Flower St.)

- The northbound HOV off-ramp structure would diverge from the mainline transitway and pass over the Adams Blvd. overcrossing, the southbound HOV on-ramp structure, and the realigned Flower St. overcrossing. Likewise, the southbound HOV on-ramp structure would pass over the Adams Blvd. overcrossing and merge with the mainline transitway structure south of 27th St.

There was considerable public opposition to implementing the recommended alternative. Some of the major concerns expressed by attendees were as follows: opposition to widening Figueroa St., circulation impacts due to the increased traffic, Figueroa St. becoming unsafe for pedestrians, harm to historic properties, noise and vibration impacts, air quality, aesthetics, opposition to the conclusions in the environmental document, seismic impacts on structures, and lack of public involvement.

The meeting was adjourned with the understanding that Caltrans would develop other alternatives for the Northern Terminus proposal. After the open house/public input meeting, Caltrans met several times with hospital officials, community groups, and the City of Los Angeles Department of Transportation (LADOT) to work out modifications to the design amenable to all concerned. Several alternatives were developed, but were later found infeasible. Another concern was voiced, when the Los Angeles County Transportation Commission (LACTC) was unable to make a firm commitment to a future Light Rail Transit Line on Flower St. This made it difficult for Caltrans and LACTC to develop a mutually usable design configuration for the Flower St. Bridge. Because of these issues and concerns, the design configurations were dropped from further consideration.

The mobility needs of the community has changed since the 1990's. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Aulenta 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Aulenta 2: The commenter's concerns are noted. No evidence has been provided by the commenter showing that these concerns would result in a significant impact as a result of the proposed project.

According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

Further, there are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

According to the Community Impact Assessment (August 2015), no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period. Further, the height of the standard type 76 railing on the bridge would eliminate potential headlight glare from vehicles on the flyover. Therefore, headlight glare would be negligible.

The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Aulenta 3: The commenter's concerns are noted. The four analyzed intersections were selected based on the potential impact. It was determined that analyzed intersections were the only intersections that will be affected due to future trip redistribution if the project is implemented. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Caltrans Division of Traffic Investigations concur that enhancing capacity will often induce DMT's by encouraging drivers to use the new facility. However, adding capacity also enhances the Level of Service (LOS) and improves traffic flow, thus, reducing traffic delays, improving air quality, and improving accident rates. The Traffic Study considers a 20% increase in traffic for future analysis, even though, MyFig project will discourage some motorists from using the proposed ramp onto Figueroa Street. MyFig Project will decrease existing travel lanes capacity of Figueroa Street from three to two lanes by converting an existing vehicles travel lane to cyclists only, therefore, increasing travel time delay. Hence, some motorists will be discouraged from using the new structure and choose to remain traveling northbound toward downtown using freeway mainlines. For this reason, Caltrans anticipates that traffic demand on this ramp will decrease when MyFig Project is implemented. Therefore, the vehicular volumes on Figueroa Street will decrease.

Aulenta 4: Concerns over maintenance of the area under the structure are noted. A maintenance agreement will be completed to ensure the area under the structure is properly maintained. With respect to who will police the area under the structure, LAPD has jurisdiction over this area. The commenter believes that Caltrans is solving one issue while creating a whole set of issues a couple of blocks away and spending a significant amount of money to do so. This is considered the commenter's opinion, the commenter has not stated what issues will be created. Therefore, a response to this part of the comment cannot be completed.

Section 2.1.5 of the environmental document, includes a discussion of the open house/public input meeting held by Caltrans on May 3, 1990 for the I-110 Transitway Northern Terminus to Adams Boulevard Initial Study/Environmental Assessment. The recommended alternative for that project was (Northbound HOV off-ramp to Figueroa Street and Southbound HOV On-ramp from realigned Flower Street, south of 23rd Street with the demolition and reconstruction of the Flower Street Overcrossing) was the main subject. Some of the primary features of the alternative were as follows:

- An elevated structure Bus/HOV transitway, an elevated HOV northbound off-ramp to Figueroa St. just south of 23rd St., and an elevated HOV southbound on-ramp from a realigned Flower St. south of 23rd St. just west of the Orthopedic Hospital (2400 South Flower St.)

- The northbound HOV off-ramp structure would diverge from the mainline transitway and pass over the Adams Blvd. overcrossing, the southbound HOV on-ramp structure, and the realigned Flower St. overcrossing. Likewise, the southbound HOV on-ramp structure would pass over the Adams Blvd. overcrossing and merge the mainline transit way structure south of 27th St.

There was considerable public opposition to implementing the recommended alternative. Some of the major concerns expressed by attendees were as follows: opposition to widening Figueroa St., circulation impacts due to the increased traffic, Figueroa St. becoming unsafe for pedestrians, harm to historic properties, noise and vibration impacts, air quality, aesthetics, opposition to the conclusions in the environmental document, seismic impacts on structures, and lack of public involvement.

The meeting was adjourned with the understanding that Caltrans would develop other alternatives for the Northern Terminus proposal. After the open house/public input meeting Caltrans met several times with hospital officials, community groups, and the City of Los Angeles Department of Transportation (LADOT) to work out modifications to the design amenable to all concerned. Several alternatives were developed, but were later found infeasible. Another concern was voiced, when the Los Angeles County Transportation Commission (LACTC) was unable to make a firm commitment to a future Light Rail Transit Line on Flower St. This made it difficult for Caltrans and LACTC to develop a mutually usable design configuration for the Flower St. Bridge. Because of these issues and concerns, the design configurations were dropped from further consideration.

The mobility needs of the community has changed since the 1990's. In the past 26 years, the project study area has experienced many development projects that have placed a high demand on the transportation system and a need for improved mobility. A list of anticipated projects can be found in section 2.1 of the environmental document.

Aulenta 5: The commenter's opposition to the project is noted. The remainder of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Wen 1: The thirteen (13) alternatives that were considered can be found in section 1.6 of the environmental document. The commenter mentioned that some of the alternatives had to do with spilling the traffic in a Y, and that Caltrans should consider this. Caltrans Traffic Investigations Unit is unsure of what the commenter is asking, and therefore, cannot consider this suggestion.

The Harbor Transitway is an 11-mile grade-separated bus and HOT facility, which runs in the median of I-110 from Harbor Gateway Transit Center and it ends at the viaduct close to 28th Street where it stands 51 feet above the grade level; therefore, it is not structurally practical and financially feasible to consider an underground alternative for this project.

Wen 2: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Black 1: The commenter's opinion of current noise levels is noted. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear. Refer to section 2.2.5 of the environmental document for further details.

Souza 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Meyers 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Meyers 2: It is the commenter's opinion that the proposed environmental clearance document is inadequate. Technical studies, which support the findings summarized in the environmental document are available upon request from Caltrans Division of Environmental Planning (Sally Moawad at (213)897-9981 or Sally.moawad@dot.ca.gov). Commenter states that there are conflicts in the environmental document, but no detail is provided on what those conflicts.

The results of the SimTraffic simulation for current HOT lanes users using the proposed flyover structure indicate that users would save on average five to ten minutes of travel time during AM and PM peak hours. Consequently, the traffic travel time on local streets will potentially improve by one to two minutes during peak hours because of the re-distribution of traffic. The elevated structure will be used by drivers and the demand on the HOT off-ramp at Adams Blvd. will decrease. Signal light optimization will allow more automobiles to get through a green light with the elevated structure in place. In turn, the stop delay for eastbound/westbound Adams Blvd. will decrease.

Further, commenter believes there is no benefit to the community. According to the Community Impact Assessment (August 2015), there are positive impacts (project benefits) resulting from the project, such as improving access to the surrounding land uses for various community members with various income, levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local businesses are also anticipated through improvements in circulation and safety which will encourage economic growth for both minority owned and non-minority owned businesses.

Lastly, one of the mitigation measures in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way to access the surrounding community.

Meyers 3: Comments made at earlier stages of this project are considered, but Caltrans is not required to formally respond to those comments. Further, although Caltrans is not required to respond to comments when the level of environmental document is an IS/EA, it is Caltrans policy to respond to comments.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. No evidence has been provided which would justify elevating the environmental document to an EIR.

Meyers 4: The commenter's opinion is noted. According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Meyers 5: An analysis of fault rupture hazard for a particular fault requires that the fault be located exactly, and its potential for rupture to be known, if only approximately. There are no known earthquake faults crossing the project. The closest earthquake fault zone under the auspices of the Alquist-Priolo Earthquake Fault Zoning Act is the Newport-Inglewood Fault Zone, which is located 4.5 miles SW of the project.

Liquefaction may take place if near-surface subsurface materials are loose to medium dense granular and non-plastic soils, submerged in shallow groundwater, and are shaken by an earthquake with sufficient energy. All of these characteristics must be present for liquefaction to potentially occur. Additionally, there is well established guidance for evaluating a site's potential for liquefaction, which has been applied to this project.

The subsurface information obtained for the design of existing bridges near the job site and the recent subsurface exploration performed for the proposed bridge, indicate the subsurface soils at the site are dense to very dense. The liquefaction potential of the site was evaluated using subsurface information and the established technical procedure. The result of the evaluation indicates the site has a low probability of liquefaction.

Meyers 6: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Florio 1: The commenter's opinion is noted. Chapter 4 of the environmental document provides a list of preparers, which shows professional experience and education. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence to justify the preparation of an EIR.

The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House is outside the boundaries of the established project area of Potential Effects as well as the Supplemental APE. No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Florio 2: The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence to justify elevating the environmental document to an EIR.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Florio 3: University Park and St. James Historic District are within the project study area and have been considered for any potential impacts as a result of the proposed Build Alternative.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Chapter 4 of the environmental document provides a list of preparers, which shows professional experience and education. The remainder of this comment is considered the commenter's opinion and does not require a response.

Shears 1: The commenter's opposition to the proposed project is noted. The first part of this comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

One of the mitigation measures proposed in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a shortcut to access the surrounding community.

The commenter's support for the No Build Alternative and recommendation of completing an Environmental Impact Report is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal project development team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. No substantial evidence has been provided by the commenter to justify elevating this environmental document to an EIR.

Tracey 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Tracey 2: The commenters concern over page 181 of the environmental document is noted. Please refer to Section 2.2.5 for further discussion of Noise and Vibration. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Existing noise levels were recorded at 7 locations and modeled at 3 locations, which were acoustically representative of the entire area within the limits of the project. The existing ambient noise levels measured were between 63 and 67 decibels (dBA). One long-term (24-hour) noise level reading was conducted to determine the noisiest hour within the project limits. Refer to Table 28 of the environmental document for a summary of short term noise measurements, which shows the highest noise reading at R5 (2315 Flower St.) at 67.3 dBA and the lowest noise reading at R2 (2916 S. Hope St.) at 62.5 dBA. Refer to Table 29 of the environmental document for a summary of background noise measurements which are less than 55 dBA for both locations, and Table 30 for a summary of long term measurements at I-110 Figueroa St. Overcrossing which was 71.3 dBA for a 24-hour duration.

As a result of this noise investigation, it was found that during construction, activities may intermittently dominate the noise environment, but will be minimized with the proper minimization measures listed in Table 1 of the environmental document. Future noise levels were predicted for design year 2040. The closest analyzed location to the proposed structure is 514 W. Adams Blvd. The predicted noise level without the project is 45 decibels (interior noise reading) and with the project the noise level is predicted to be at 46.7 decibels. This slight increase in noise level would be barely noticeable to the human ear.

As far as construction vibration effects are concerned, based on construction standards in the Caltrans (2013) Transportation and Construction Vibration Guidance Manual, the probability of exceeding architectural damage risk amplitudes for continuous vibrations (such as excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment) from construction is very low, and from freeway traffic would even be lower.

However, if vibration concerns involve pavement breaking, extensive pile driving, or trains, 25 feet (7.5 meters) or less from normal residences, buildings, or unreinforced structures, damage is a real possibility. This may also be true if these operations occur within 50–100 feet (15–30 meters) from historic buildings, buildings in poor condition, or buildings previously damaged in earthquakes. In any case, extreme care must be taken when sustained pile driving occurs within 25 feet (7.5 meters) of any building, and 50–100 feet (15– 30 meters) of a historic building, or a building in poor condition. Although, the exact method of constructing the concrete column supports/bents has not been identified at this stage of the design process, Caltrans is only considering the use of vibration reduction construction methods, such as Cast-In-Place Concrete Piles or Jetting, for the proposed Build Alternative.

Additionally, construction-related ground disturbance in the immediate vicinity of St. John's Episcopal Church will occur between 160–230 feet from the east side of the St. John's Episcopal Church building. Therefore, no vibration effects to St. John's Episcopal Church building are anticipated. Although there is sufficient distance between the construction site and sensitive receptors, avoidance and minimization measures (summarized in Table 1 of the environmental

document) will be implemented during the construction period in order to ensure that ground vibration is kept to a minimum.

Tracey 3: The commenter's support for the No Build Alternative is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or environmental analyses in the environmental document.

Kim 1: In 1990, the recommended alternative (Northbound HOV off-ramp to Figueroa Street and Southbound HOV on-ramp from realigned Flower Street, south of 23rd Street with the demolition and reconstruction of the Flower Street overcrossing) was the main subject. Some of the primary features of the alternative were as follows:

- An elevated structure Bus/HOV transitway, an elevated HOV northbound off-ramp to Figueroa Street just south of 23rd Street, and an elevated HOV southbound on-ramp from a realigned Flower Street south of 23rd Street just west of the Orthopedic Hospital (2400 South Flower Street).

- The northbound HOV off-ramp structure would diverge from the mainline transitway and pass over the Adams Blvd. overcrossing, the southbound HOV on-ramp structure, and the realigned Flower Street overcrossing. Likewise, the southbound HOV on-ramp structure would pass over the Adams Blvd. overcrossing and merge the mainline transit way structure south of 27th Street.

Roskam 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document. The commenter's opposition to the project is noted.

Smith 1: The commenter's opposition to the project is noted. The commenter states that the proposed Build Alternative will bring problems and it will impact students. This is considered the commenter's opinion. The commenter is concerned with noise and traffic impacts as a result of the proposed alternative.

Refer to section 2.2.5 for Noise and Vibration details, and section 2.1.8 for Traffic and Transportation details.

Knutzen 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Knutzen 2: Design details of how the proposed project will intersect with the protected lane on Figueroa Street will be developed during the design phase of the project (refer to Figure 30 for a preliminary plan). Impacts to the bicycle and pedestrian environment on Figueroa Street are not anticipated because traffic at the intersection of Figueroa Way and Figueroa Street will be regulated with the help of traffic lights, which will protect both bicyclists and pedestrians.

The proposed project will convert the existing free-flow right turn from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig project. Caltrans is working closely with the City of Los Angeles to ensure that the proposed Build Alternative is compatible with MyFig Project. If you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

Knutzen 3: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document. The commenter's opposition to the project is noted.

Williams 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document. The commenter's opposition to the project is noted.

Lee 1: The commenter's support for the No Build Alternative is noted. A review of the Zoning and General Plan for the surrounding area indicates that the area is comprised of commercial, industrial, open space and residential multiple family land use designations. Various types of buildings surround the project area, gas stations, strip malls, historical buildings, churches and non-descript office buildings. These properties make-up the man-made visual resources. Single family residential units are sparse in the immediate area adjacent to the project location. The nearest single family residential area is a quarter mile to the west. Therefore, the area near the proposed project location is considered urban.

McDowell 1: The commenter's opposition to the project is noted. The proposed project would carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street. The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Caltrans does not have the authority to address issues/concerns and/or re-design local streets, therefore, issues/concerns on local streets should be communicated to the City of Los Angeles.

McDowell 2: The 11 alternatives considered, but eliminated from further consideration can be found in section 1.6 of the environmental document. These alternatives were found to not meet the purpose and need of the project and not carried forward for environmental analysis.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence to justify the preparation of an EIR.

With or without the proposed project, northbound travel demand Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street. The existing HOT off-ramp will remain open to traffic, therefore, motorists can travel Adams Blvd. (eastbound/westbound) in either direction. So, motorists are still able to travel Figueroa Street via Adams Blvd. and make a safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Some traffic may be diverted from congested adjacent streets onto Adams Blvd. which will improve traffic conditions on adjacent streets. Issues with local streets are outside of the scope of this project, but if a project will potentially impact local roadways Caltrans will work with the local agency to minimize any potential impacts, but Caltrans has no jurisdiction over local streets.

McDowell 3: The commenter's opinion is noted. The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT

lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

The proposed structure will not be limited to individuals who can afford to use the HOT Lanes. Buses will be able to use the flyover to get passengers to their destinations. There are currently 213 transit trips/weekday that travel on the NB I-110 Express Lanes and exit at Adams Blvd. Metro Silver Line ridership has increased from 89,683 trips per month (northbound only) in November 2012 to 112,102 (northbound only) per month in November 2015.

Transit Provider	Average Weekday Ridership (Nov 2015, NB only)
Metro Silver Line	4,662
Metro Line 450	577
Gardena Transit	355
LADOT Commuter Express	634
Torrance Transit	107
Orange County Transportation Authority	118
Total	6,453

Lastly, the proposed structure would bypass the bottleneck intersections at Flower St. and Adams Blvd. and NB I-110 HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street.

The remainder of this comment is considered the opinion of the commenter and does not require a response.

McDowell 4: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence to justify the preparation of an EIR.

The purpose of this project is to bypass the bottleneck intersections at Flower Street and Adams Blvd. and NB HOT off-ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street, thus, reducing traffic delay, and improving accident rates at this location. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Converting 23rd Street to a bicycle only lane is not within Caltrans' authority. The City of Los Angeles has jurisdiction on 23rd Street, not Caltrans. Refer to Figure 1 of the environmental document to see the location of Figueroa Way.

The Project Development Team (PDT) considered 13 alternatives and 11 alternatives were considered, and later eliminated from further consideration for various reasons, which can be found in Section 1.6 of the environmental document.

The PDT is an internal project team, which is formed with project staff from many different disciplines to help the project manager in directing the course of studies makes recommendations and works to carry out the project work plan. They participate in major meetings, public hearings and community involvement. At a minimum, a PDT is composed of the project manager, a representative of the regional transportation planning agency (if involved), and representatives from district design, environmental, traffic, safety, surveys, construction, and maintenance units, and the right of way branch. An environmental representative is a required member. The selection of additional team members depends on the scope and complexity of the proposed project. The interdisciplinary skills of the district, Headquarters, FHWA, local and regional agencies, and other sources are requested as needed, to ensure that engineering, social, economic, and environmental aspects are adequately assessed, and reasonable evaluations and decisions are made. Representatives of resource and regulatory agencies are encouraged to participate. The PDT may include individuals from local or regional agencies and/or representatives of community groups. The PDT's educational background and experience can be found in Chapter 4 of the environmental document.

Fine 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or environmental analyses in the Draft IS/EA. The commenter's opposition to the project is noted.

Fine 2: Although the Section 106 process found that there is an adverse effect on St. John's Episcopal Church and St. John's Parish House, it does not automatically cause a significant impact under CEQA. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

Further, the existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment to justify the preparation of an EIR.

The Finding of Adverse Effect document prepared for this project in August 2015 identified adverse effects on historic properties. SHPO had no objections to the finding of adverse effect on St John's Episcopal Church but objected to findings of no adverse effect on St. John's Parish House, finding that an adverse effect would be caused by the proposed project. SHPO also found no adverse effect was expected to result from the undertaking on the Automobile Club of Southern California, St. Vincent de Paul Church and the Thomas Stimson House. Both St. Vincent de Paul Church and the Thomas Stimson House contribute to the significance of the Chester Place Historic District, thus no adverse effect is expected to be caused by the proposed project on that historic district. The Slauson House is outside the boundaries of the established project area of Potential Effects as well as the Supplemental APE. No effects are expected to result from the proposed project on that property. The effects of the proposed project on historic properties and historical resources in the project APE were thoroughly analyzed in the project Finding of Adverse Effect.

In establishing cultural resources mitigation measures, the goal is to reduce or entirely avoid the expected effects of the proposed project on historic properties. For a project of this type, there are no standard mitigation measures that can lessen the effects of a flyover of this size and height. One of our main objectives is to balance the project requirements with the varying needs and desires of consulting parties and the public. Effective public participation is crucial to the process. We make every effort to ensure the adequacy of environmental commitments, however there is not an all-encompassing solution that can make the expected environmental effects of the proposed project disappear. Caltrans has coordinated with consulting parties on numerous occasions, requesting suggestions for mitigation measures. No mitigation measures that would directly compensate for the expected effects of the proposed project on the two, nearby historic properties have been identified.

The mitigations described in the environmental document sufficiently commits the project proponent to future mitigation by detailing specific performance standards. These aspects of project mitigation can properly be deferred so long as specific performance standards are in place. Deferred mitigation is normally unclear, loose or open ended, and can postpone preparation of required technical studies

that are otherwise required to make decisions. As long as specific performance standards have been identified, and are expected to be performed at an appropriate schedule, the identified mitigation measures cannot be considered deferred. Normally, courts hold that mitigation under these circumstances is adequate. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

Fine 3: The commenter's opinion is noted. Caltrans respectfully disagrees with the commenter's opinion. Caltrans has adequately assessed the potential impacts of the proposed Build Alternative, and provided avoidance, minimization, and/or mitigation measures to ensure that any potential impacts are minimized. Refer to section 2.1.5 for community character, section 2.1.9 for visual/aesthetics, 2.1.10 for cultural resources, and section 2.2.5 for noise and vibration findings as well as avoidance, minimization, and/or mitigation measures.

Alferez 1: The commenter's opinion is noted. One of the mitigation measures proposed in the environmental document includes re-designing Figueroa Way into a pedestrian and bicycle corridor (see Figure 21 of the environmental document). Mitigation P&B-1: Re-design Figueroa Way to accommodate and encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, and ADA compliance, adding a bike pathway or lane, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a shortcut to access the surrounding community.

Alferez 2: The Section 106 process determined that no direct impacts to historical properties are anticipated as a result of the proposed project. Caltrans finds and SHPO concurs that the undertaking may result in adverse effects on two of the five historic properties:

- St. John's Episcopal Church, 510-518 West Adams Blvd., Los Angeles
- St. John's Parish House, 515-517 West 27th St., Los Angeles

Caltrans also finds and SHPO concurs that the undertaking is expected to cause effects, but they would not be adverse to three of the five historic properties:

- Automobile Club of Southern California, 2601 South Figueroa St. (alternate addresses: 650 West Adams Blvd. and 661 West 27th St., Los Angeles
- St. Vincent de Paul Church, 601 West Adams Blvd., Los Angeles
- Thomas Stimson House, 2421 South Figueroa St., Los Angeles

An overall finding of adverse effect was made for this undertaking. St. John's Episcopal Church and St. John's Parish House are historic properties for which the proposed project is expected to introduce visual elements that would be out of character and thus result in adverse effects. With the implementation of avoidance, minimization and/or mitigation measures (please refer to section 2.1.10 of the environmental document); the impact on the two historical properties will be less than significant. Caltrans has prepared a Memorandum of Agreement to address effects.

According to the Visual Impact Assessment (April 2015), the proposed project location is an urban area, so the proposed project would not intrude on the existing visual character. It is anticipated that the average response of all viewer groups will be low. There are no permanent or temporary adverse and/or significant visual impacts as a result of the proposed Build Alternative. Refer to section 2.1.9 of the environmental document for additional details.

Alferez 3: According to the Community Impact Assessment (August 2015), the project will not create a temporary or permanent barrier that divides the neighborhood and it does not limit access to all or part of the neighborhood. The elevated structure would not physically impede access to any part of the neighborhood. Temporary closure may occur during construction on Figueroa Way. Access to the community will be improved by improving circulation, and safety.

There are positive impacts (project benefits), such as improving access to the surrounding land uses for various community members with various income levels whether they are driving in an automobile/carpooling, using public transportation, walking or bicycling. This project will improve access to jobs and community services within the Project Study Area. Improved access to local business by improving circulation and safety which will encourage economic growth to both minority owned and non-minority owned businesses.

Further, access to the flyover structure will be available to both HOT lanes users and transit users. The proposed Build Alternative will improve travel times and safety in the area for both automobile drivers and transit patrons.

Also, no permanent adverse impacts to businesses are anticipated as a result of the proposed Build Alternative. The implementation of the Transportation Management Plan will minimize disruption to business activities during the construction period. Access to businesses will be maintained during the construction period and proper signage will be used to ensure the community is able to access businesses during the construction period.

Velas 1: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Velas 2: One of the major mitigation measures associated with this project is to re-design Figueroa Way into a pedestrian and bicycle corridor (refer to Figure 21 of the environmental document), therefore, Caltrans is encouraging a more pedestrian and bicycle friendly area. Further, a maintenance agreement will be in place to ensure the area under the structure is maintained. The commenter's opposition to the project is noted.

Rascone 1: The commenter's support for the project is noted.

Norton 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Norton 2: The Traffic Study Report for this project was prepared in 2015. The analysis was based on adopted Highway Capacity Manual 2010 (HCM 2010) and considered MyFig Project. The scope of the traffic report was determined by the potential traffic impact. The scope of the traffic report was small because the traffic redistribution as a result of the proposed project is relatively small.

With or without the proposed project, northbound travel demand Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street. The existing HOT off-ramp will remain open to traffic, therefore, motorists can travel Adams Blvd. (eastbound/westbound) in either direction. So, motorists are still able to travel Figueroa Street via Adams Blvd. and make a safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd. between the off-ramp and Figueroa Street. Some traffic may be diverted from congested adjacent streets onto Adams Blvd. which will improve traffic conditions on adjacent streets. Issues with local streets are outside of the scope of this project, but if a project will potentially impact local roadways Caltrans will work with the local agency to minimize any potential impacts, but Caltrans has no jurisdiction over local streets.

Norton 3: The commenter's opinion is noted. The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

The proposed project will convert the existing right turn free flow from Figueroa Way onto Figueroa Street to a "STOP" controlled approach. The project is proposing to install at this location the following improvements:

Pedestrian Hybrid Beacon: also known as the high intensity activated crosswalk (or HAWK) is a pedestrian-activated warning device located on the roadside or on mast arms over midblock pedestrian crossings.
High-Visibility Crosswalk Markings: Marked crosswalks guide pedestrians and alert drivers to a crossing location, so it is important that both drivers and pedestrians clearly see the crossings.
Pedestrian Countdown Signals: Countdown signals tell pedestrians the amount of time remaining before the flashing upraised hand changes to a solid upraised hand or "don't walk" indication. Research shows that both drivers and pedestrians tend to comply with these signals more often than with non-countdown signals.
Automated Pedestrian Detection: Automated pedestrian detection devices are able to sense when a pedestrian is waiting at a crosswalk and automatically send a signal to switch to a pedestrian WALK phase.
Bicycle Detection: Bicycle detection is used at actuated signals to alert the signal controller of bicycle crossing demand on a particular approach. Bicycle detection occurs either through the use of push-buttons or by automated means (e.g., in-pavement loops, video, microwave, etc.). Inductive loop vehicle detection at many signalized intersections is calibrated to the size or metallic mass of a vehicle. For bicycles to be detected, the loop must be adjusted for bicycle metallic mass. Otherwise, undetected bicyclists must either wait for a vehicle to arrive, dismount and push the pedestrian button (if available), or cross illegally. Proper bicycle detection meets two primary criteria: 1) accurately detects bicyclists; and 2) provides clear guidance to bicyclists on how to actuate detection (e.g., what button to push, where to stand). The four primary types of bicycle signal detection are:

- Loop – Induction loop embedded in the pavement
- Video – Video detection aimed at bicyclist approaches and calibrated to detect bicyclists
- Push-button – User-activated button mounted on a pole facing the street
- Microwave – Miniature microwave radar that picks up non-background targets

The City of Los Angeles completed a Traffic Study Report to assess the impact of the MyFig Project. Caltrans is working closely with the City of Los Angeles to ensure that the proposed Build Alternative is compatible with MyFig Project. If you have any questions with respect to the MyFig Project, please contact the City of Los Angeles.

Battan 1: The commenter's support for the project is noted.

Battan 2: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Battan 3: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Battan 4: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Battan 5: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Marty 1: This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document. The commenter's opposition to the project is noted.

Azriel 1: The commenter's opinions and opposition to the project are noted. The purpose and need of the project is as follows:
Purpose:
The purpose of the project is to alleviate congestion and reduce the queuing and delay on the managed HOT lanes, Adams Blvd. off-ramp, and associated nearby intersections. The project would improve traffic flow in a congested area of downtown Los Angeles by removing traffic from congested and confusing intersections.

Need:
The current termination of the northbound I-110 HOT lanes at Adams Blvd. presents a particularly challenging bottleneck, as approximately half of the HOT lane traffic exits here to access downtown Los Angeles via Figueroa St., which affects the nearby intersections of Flower St. & Adams Blvd. and Northbound I-110 HOT off-ramp to Adams Blvd. The existing Northbound HOT lane at Adams Blvd. is a concentrated accident location, which is a safety concern. According to the Traffic Accident Surveillance and Analysis System (TASAS), and the Transportation Systems Network (TSN) reports, the accident rate at this location between October 1, 2010 and September 30, 2013 is 0.23, slightly higher than the average accident rate, which is 0.21. Accident rates are expressed as number of accidents fatal plus injury divided by million vehicle miles. The accident rate considers driving conditions, and if there were any injuries or fatalities. The vehicles currently existing NB HOT lane off-ramp approach queues onto the mainline which potentially causes an increase in rear end collision type of accidents.

With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street. The existing HOT off ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets.

Carter 1: The commenter's concerns are noted. With or without the proposed project, northbound travel demands on Figueroa Street will be approximately the same. The redistribution of traffic will occur only at Adams Blvd. between the off-ramp and Figueroa Street. The new proposed ramp will carry the HOT lane traffic originally accessing Figueroa Street via Adams Blvd. directly onto Figueroa Street via Figueroa Way. No additional traffic will be diverted to 23rd Street.

The existing HOT off-ramp will remain open to traffic, thus, motorists can travel Adams Blvd. eastbound/westbound direction. Therefore, motorists are still able to travel Figueroa Street via Adams Blvd. and make safe left-turn at 23rd Street. Note that the proposed project will significantly improve the traffic conditions at this segment of Adams Blvd., between the off-ramp and Figueroa Street. Therefore, some traffic may be diverted from congested adjacent streets onto Adams Blvd., thus, improving traffic conditions on adjacent streets. Caltrans does not have the authority to address issues/concerns on local streets, therefore, issues/concerns on local streets should be communicated to the City of Los Angeles.

The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Project Development Team, based on the results of field surveys and technical studies. Because the significance of an effect may vary depending on the environmental setting, set rules for determining significance in every case have not been established. Some public agencies have established thresholds of significance for CEQA. Because the Department has statewide jurisdiction and the setting for projects varies so extensively across the state, the Department has not and has no intention to develop thresholds of significance for CEQA. The determination of significance under CEQA is left to the internal Project Development Team, with particular deference paid to the expertise of environmental staff and other specialists.

The existence of public controversy over the environmental effects of a project will not require preparation of an EIR if there is no substantial evidence that the project may have a significant effect on the environment. The commenter has not provided substantial evidence that the project may have a significant effect on the environment.

Carter 2: The commenter's opinion is noted. This comment does not raise an environmental issue within the context of CEQA and/or NEPA, or comment on the adequacy of the technical information or analyses in the environmental document.

Stephenrej 1: Traffic is only one of the factors that are considered in the evaluation of potential impacts as a result of the proposed Build Alternative. The topics that have been evaluated in the environmental document are:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)

- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography
- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Further, the following studies have been completed to determine effects on St. John's Church as a result of the proposed project:

1. Historic Resources Evaluation Report (April 2015)
2. Supplemental Historic Property Survey Report (May 2015)
3. Finding of Adverse Effect (August 2015)

Mawhorter 1: Traffic is only one of the factors that are considered in the evaluation of potential impacts as a result of the proposed Build Alternative. The topics that have been evaluated in the environmental document are:

- Land Use
- Consistency with State, Regional, and Local Plans and Programs
- Parks and Recreational Facilities
- Growth
- Community Character and Cohesion
- Environmental Justice
- Utilities Impacts/Relocations & Emergency Services
- Traffic and Transportation/ Pedestrian and Bicycle Facilities
- Relocations and Real Acquisition (Business/Housing Displacements)
- Visual/Aesthetics Impacts
- Cultural Resources
- Water Quality and Storm Water Runoff
- Geology, Soils, Seismicity and Topography
- Paleontology
- Hazardous Waste
- Air Quality
- Noise and Vibration
- Biological Resources
- Cumulative Impacts

Chapter 5 List of Preparers

Caltrans District 7 Division of Environmental Planning

Ronald Kosinski, Deputy District Director of Environmental Planning, 41 years of experience. Cal Poly Pomona, MA in Urban Planning (1976).

Garrett Damrath, Chief Environmental Planner, 17 years of experience. California State University at San Bernardino, BA in Environmental Studies (1997), and BA in Geography (1998).

Jason Roach, Senior Environmental Planner (Environmental oversight), 20 years of experience. University of California, Riverside, BS in Environmental Science (1997).

Allison Morrow, Senior Environmental Planner (Former Environmental oversight), 7 years of experience. University of California, Irvine, BA in Environmental Analysis and Design (2007), and California State University, Long Beach, Master of Business Administration (2012).

Sally Moawad, Associate Environmental Planner (CEQA/NEPA & Community Impact Assessment), 11 years of experience. California State University, Fullerton, BA in Political Science (2004) and MS in Environmental Studies, emphasis Policy and Planning (2007).

Kelly Ewing-Toledo, Senior Environmental Planner (Cultural Resources), 15 years of experience. California State University, Fullerton, MA History/Public History (2000).

Francesca Smith, Associate Environmental Planner/Architectural Historical (Historical Resources), 29 years of experience. Columbia University, BA, Political Science (1981) and MS (1986) in Real Estate Development (completed requirements for MA in Historic Preservation).

Caprice Harper, Associate Environmental Planner (Archeology), 18+ years of experience. California State University, Los Angeles, BA in Anthropology (1992), Masters in Anthropology (1997) and University of Victoria, British Columbia Graduate Professional Certificate in Cultural Heritage Studies (2013).

Paul Caron, Senior Environmental Planner (Biology), 24 years of experience. Cal Poly, San Luis Obispo, BS in Environmental and Systematic Biology (1990).

Dawn Kukla, Supervising Environmental Planner (Paleontology), 17 years of experience. University of California, Santa Barbara, BA in Environmental Studies (1998) and BA in Geography (1998).

Andrew Yoon, Senior Transportation Engineer (Air Quality), 18 years of experience. University of California, Los Angeles, BS in Civil and Environmental Engineering (1997).

Jin S. Lee, Senior Transportation Engineer (Noise & Vibration oversight) 27 years of experience. University of Washington, BS in Civil Engineering (1988).

Samia Soueidan, Transportation Engineer (Noise & Vibration), 9 years of experience. California State University, Long Beach, BS in Civil Engineering (2001).

Steve Chan, Senior Transportation Engineer (Hazardous Materials Oversight), 24 years of experience. California State University, Los Angeles, BS in Civil Engineering (1991), Registered Professional Engineer (PE) (1995).

Hung Pham, Transportation Engineer (Hazardous Materials), 8.5 years of experience. California State University, Long Beach, BA in Civil Engineering (2004).

Caltrans District 7 Division of Project Development

Khan Hossain, Senior Transportation Engineer (Design), 23 years of experience. California State University, Los Angeles, MS in Civil Engineering (1999) and Masters in Engineering (1993).

Andranik Arzumanian, Transportation Engineer (Design), over 17 years of experience. Cal State University, Long Beach, MS in Civil Engineering Structural (1985).

Caltrans District 7 Division of Project Management

John Vassiliades, Project Manager, 32 years of experience. California State University, Long Beach, MS in Civil Engineering (1982).

Mirna Dagher, Project Manager, 12 years of experience. California State Polytechnic University, Pomona, BS in Civil Engineering (1993).

Caltrans District 7 Office of Engineering Services

Shirley Pak, Senior Transportation Engineer (Stormwater/Water Quality), 15 years of experience. University of Southern California, B.S. in Civil Engineering (1988).

Gustavo Ortega, Senior Engineering Geologist (Geotechnical Design), 33 years of experience. National Polytechnic Institute/Mexico City, BS in Engineering Geology (1982), MS in Geology (1985).

Caltrans District 7 Office of Landscape Architecture

George Olguin, Landscape Associate (Visual Impact Assessment), 25 years of experience. California State Polytechnic University, Pomona, BS in Landscape Architecture (BSLA) (1989).

Caltrans District 7 Office of Freeway Operations

George Chammas, Transportation Engineer (Traffic Operations), 25 years of experience. Cal State University, Los Angeles, BS in Civil Engineering (1984).

Chapter 6 Distribution List

Table 40: Distribution List

Agency/Public/ Elected Official	Name	Affiliation	Address	City, State, Zip Code
Agency	Stephanie Hall	Los Angeles District, United States Army Corps of Engineers	915 Wilshire Blvd, Suite 930	Los Angeles, CA 90017
Agency	Rick Farris	United States Fish and Wildlife Service	2493 Portola Rd, Suite B	Ventura, CA 93003
Agency	Raymond Sukys	Federal Transit Administration	201 Mission St, Suite 1650	San Francisco, CA 94105-1839
Agency	Patricia S. Port	United States Department of the Interior	333 Bush St, Ste 151	San Francisco, CA 94104
Agency	Marilyn Sutton	National Park Service	401 West Hillcrest Dr.	Thousand Oaks, CA 91360
Agency	Alessandro Amaglio	Federal Emergency Management Agency	1111 Broadway, Suite 1200	Oakland, CA 94607-4052
Agency	Donny Hamilton	Federal Highway Administration, California Division	650 Capitol Mall, Ste 4-100	Sacramento, CA 95814
Agency	Bridgett Luther	California Department of Conservation	801 "K" Street, MS 24-01	Sacramento, CA 95814
Agency	Ed Pert	California Department of Fish &Wildlife	3883 Ruffin Road	San Diego, CA 92123
Agency	Kirk Miller	California Resources Agency	1416 Ninth Street, Suite 1311	Sacramento, CA 95814
Agency	S.V. Bernard	California Highway Patrol	411 N. Central Ave, Suite 410	Glendale, CA 91203
Agency	Mindy Fox	California Integrated Waste Management Board	1001 I Street, PO Box 4025	Sacramento, CA 95814
Agency	Frank Rudy	State Water Resources Control Board	1001 I Street	Sacramento, CA 95814
Agency	Larry Myers	California Native American Heritage Commission	915 Capitol Mall, Rm 364	Sacramento, CA 95814
Agency	Barbara McDonald	California Department of Water Resources	1416 9th Street	Sacramento, CA 95814
Agency	Milford Wayne Donaldson	Office of Historic Preservation	1416 9th Street, Rm 1442-7	Sacramento, CA 95814
Agency	Terry Roberts	State Clearinghouse	PO Box 3044	Sacramento, CA 95814
Agency	Andrew Barnesdale	California Public Utilities Commission	505 Van Ness Ave.	San Francisco, CA 94102

Agency/Public/ Elected Official	Name	Affiliation	Address	City, State, Zip Code
Agency	Theresa Rodgers	State Water Resources Control Board - Los Angeles Region	320 W 4th St, Ste 200	Los Angeles, CA 90013
Agency	Henry Renteria	Governor's Office of Emergency Services	3650 Schreiver Ave	Mather, CA 95655
Agency	Marzia Zafar	Public Utilities Commission	320 W 4th St, Ste 500	Los Angeles, CA 90013
Agency	Scott Hartwell	Los Angeles County Metropolitan Transportation Authority	One Gateway Plaza, MS 99-23-2	Los Angeles, CA 90012
Agency	Stephanie Wiggins	Los Angeles County Metropolitan Transportation Authority	One Gateway Plaza	Los Angeles, CA 90012
Agency	Jim Kenan	Orange County Transportation Authority	550 S. Main St, PO Box 14184	Orange, CA 92863-1584
Agency		Santa Monica Big Blue Bus	1660 7th Street	Santa Monica, CA 90401
Agency	Derick MaHone	Torrance Transit	20500 Madrona Ave	Torrance, CA 90503-3692
Agency	James R. Mills	Torrance Transit	20500 Madrona Ave	Torrance, CA 90503-2684
Agency	Aurora Jackson	Montebello Bus Lines	400 S. Taylor Ave	Montebello, CA 90640
Agency		Gardena Bus Lines	15350 South Van Ness	Gardena, CA 90249
Agency		Carson Circuit	3 Civic Plaza Drive	Carson, CA 90745
Agency	Jeff Carpenter	CRA/LA	1200 W. 7th St, 2nd floor	Los Angeles, CA 90017
Agency	Michael C. Hunt	City of Los Angeles Department of Transportation	100 S Main St, 10th Floor	Los Angeles, CA 90012
Agency	Rongsheng Luo	Southern California Association of Governments	818 W Seventh St, 12th Floor	Los Angeles, CA 90017
Agency	Jillian Wong	South Coast Air Quality Management District	21865 Copley Dr.	Diamond Bar, CA 91765
Agency	Rebecca DeLeon	Metropolitan Water District	700 N Alameda St, US3-230	Los Angeles, CA 90012
Agency	Gail Goldberg	Los Angeles Department of City Planning	200 N Spring St	Los Angeles CA 90012
Agency	Dean D. Efstathiou	Los Angeles County Department of Public Works	900 S Fremont Ave	Alhambra, CA 91803
Agency	John Todd	Los Angeles County Fire Department	1320 North Eastern Ave	Los Angeles, CA 90063
Agency	Kevin T. Johnson	Los Angeles County Fire Department	1320 North Eastern Ave	Los Angeles, CA 90063
Agency	Paul D. McCarthy	Los Angeles County Dept of Regional Planning	Hall of Records, 13th Floor, 320 W Temple St	Los Angeles, CA 90012
Agency	Stephen R. Maguin	Los Angeles County Sanitation District	PO Box 4998	Whittier, CA 90607-4998
Agency	H. David Nahai	Los Angeles Department of Water and Power	PO Box 51111	Los Angeles, CA 90051-0100
Agency	Leroy D. Baca	Los Angeles County Sheriff's Department	4700 Ramona Blvd	Monterey Park, CA 91754
Agency	Devon M. Deming	Los Angeles World Airports	7301 World Way West, 1st Floor	Los Angeles, CA 90045

Agency/Public/ Elected Official	Name	Affiliation	Address	City, State, Zip Code
Agency	Planning and Construction Division	City of Los Angeles Dept of Recreation and Parks	221 N Figueroa St, Ste 1550	Los Angeles, CA 90012
Agency		City of Los Angeles Chamber of Commerce	350 S. Bixel Street	Los Angeles, CA 90017
Agency		County of Los Angeles Parks/Recreation	433 S. Vermont Ave	Los Angeles, CA 90020
Agency		California Department of Toxic Substances Control	1449 W. Temple St. Room 105	Los Angeles, CA 90026-5698
Agency		United States Forest Service	1400 Independence Ave, SW	Washington DC 20250
Agency		Los Angeles County Dept of Public Health	313 N. Figueroa St. Room 806	Los Angeles, CA 90012
Agency	Lambert Giessinger	City of Los Angeles Office of Historic Resources	200 N. Spring Street Room 559	Los Angeles, CA 90012
Public		South Central Los Angeles Regional Center	2500 S Western Ave	Los Angeles, CA 90018
Public	Marianne Kim	Automobile Club Southern California	3333 Fairview Rd, MS A-131	Costa Mesa, CA 92626
Public		Southern California Edison	PO Box 800	Rosemead, CA 91770
Public	Dorothy Kieu Le	Los Angeles County Bicycle Coalition	634 S Spring St, Suite 821	Los Angeles, CA 90014
Public	Eric Bruins	Los Angeles County Bicycle Coalition	634 S Spring St, Suite 821	Los Angeles, CA 90014
Public		Exposition Construction Authority	707 Wilshire Blvd, 34th floor	Los Angeles, CA 90017
Public		Los Angeles Orthopedic Hospital Foundation	2400 S Flower St	Los Angeles, CA 90007
Public	Damien Goodman	Citizen's Campaign to Fix Expo	PO Box 781267	Los Angeles CA 90016
Public		Los Angeles Neighborhood Initiative	800 S Figueroa St, Ste. 970	Los Angeles CA 90017
Public		Coalition for Responsible Community Development	3101 S Grand Ave	Los Angeles CA 90007
Public	Benjamin Torres	Community Development Tech Center	520 W 23rd St	Los Angeles, CA 90007
Public	Adela Barajas	L.A.U.R.A.	4514 Long Beach Ave.	Los Angeles CA 90058
Public	Saundra Bryant	All People's Christian Church	822 E 20th St	Los Angeles CA 90011
Public	Sandra McNeill	Figueroa Corridor Community Land Trust	152 W32nd St	Los Angeles CA 90007
Public	Vivian Bowers	Bowers and Sons Cleaners	2509 S Central Ave	Los Angeles CA 90011
Public	David Abel	Metro Investment Report	811 W Seventh St, Ste. 900	Los Angeles, CA 90017
Public		LA Mart	1933 S Broadway	Los Angeles, CA 90007
Public	The Very Reverend Canon Daniel Ade	St John's Episcopal Cathedral	514 W Adams Blvd	Los Angeles, CA 90007
Public		Carl's Jr	2912 S Figueroa St	Los Angeles, CA 90007
Public		Pasta Roma	2827 S Figueroa St	Los Angeles, CA 90007
Public		McDonald's	2810 S Figueroa St	Los Angeles, CA 90007
Public		Del Taco	2735 S Figueroa St	Los Angeles, CA 90007
Public		Domino's Pizza	2803 S Figueroa St	Los Angeles, CA 90007

Agency/Public/ Elected Official	Name	Affiliation	Address	City, State, Zip Code
Public		Goodwill	2823 S Figueroa St	Los Angeles, CA 90007
Public		St Vincent Catholic Church	621 W Adams Blvd	Los Angeles, CA 90007
Public		Jacks N Joe	2498 S Figueroa St	Los Angeles, CA 90007
Public		Wingstop	2280 S Figueroa St	Los Angeles CA 90007
Public		The UPS Store	2202 S Figueroa St	Los Angeles CA 90007
Public		The Inn at 657	663 W 23rd St	Los Angeles, CA 90007
Public		FedEx	2723 S Figueroa St	Los Angeles, CA 90007
Public		H Claude Hudson Comprehensive Health Center	2829 S Grand Ave	Los Angeles, CA 90007
Public		Her Medical Clinic	2502 S Figueroa St	Los Angeles, CA 90007
Public	Dr. John E. Deasy	Los Angeles County Unified School District	PO Box 3307	Los Angeles, CA 90051
Public		Star Christian School	2120 Estrella Avenue	Los Angeles, CA 90007
Public		St Vincent School	2333 S Figueroa St	Los Angeles, CA 90007
Public		John Adams Middle School	151 W 30th St	Los Angeles, CA 90007
Public		Orthopedic Hospital Medical Magnet School	300 W 23rd St	Los Angeles, CA 90015
Public		Mt St Mary's College	10 Chester Place	Los Angeles, CA 90007
Public	David Roberts	University of Southern California	University Park Campus, BKS 400, MC 2432	Los Angeles CA 90089
Public	David P. Ysais	LA Trade Technical College	400 W. Washington	Los Angeles CA 90015
Public		F.D. Lanterman High School	2328 St James Place	Los Angeles, CA 90007
Public		Santee Education Complex	1921 Maple Ave	Los Angeles, CA 90011
Public		County Kids' Place	2916 S Hope St	Los Angeles CA 90007
Public		Animo Jackie Robinson High School	3500 S Hill St	Los Angeles, CA 90007
Public		New Designs Charter School	2303 Figueroa Way	Los Angeles, CA 90007
Public		Kinder Care Learning Center	2916 S Hope St	Los Angeles, CA 90007
Public		West Adams Heritage Association	2263 S Harvard Blvd	Los Angeles, CA 90018
Public	Kathy Yhip	Southern California Edison, Environmental Policy and Affairs	2244 Walnut Grove Ave	Rosemead, CA 91770
Public		Legal Aid Foundation of Los Angeles	1102 Crenshaw Blvd.	Los Angeles, CA 90019
Public		LAFCO for Los Angeles County	80 South Lake Ave Ste 870	Pasadena, CA 91101
Public		Los Angeles Alliance for a New Economy	464 Lucas Ave, Suite 202	Los Angeles, CA 90017
Public		Korean Culture Center	5505 Wilshire Blvd.	Los Angeles, CA 90036

Agency/Public/ Elected Official	Name	Affiliation	Address	City, State, Zip Code
Public	The Very Reverend Mark Kowalewski	St John's Episcopal Cathedral	514 W Adams Blvd	Los Angeles, CA 90007
Public	Jean Frost	West Adams Heritage Association	2341 Scarff Street	Los Angeles, CA 90007
Public	Jim Childs	West Adams Heritage Association	2320 Scarff Street	Los Angeles, CA 90007
Public	Adrian Scott Fine	Los Angeles Conservancy	523 West 6th Street Suite # 826	Los Angeles, CA 90014
Public		University Park HPOZ Board	2326 Scarff St. #1	Los Angeles, CA 90007
Public	Laura Meyers	N.U.P.C.A.	1818 S. Gramercy Place	Los Angeles, CA 90019
Public	Mark H. Bevan	N/A	980 S. Madison Ave	Pasadena, CA 91106
Public	Hilary Norton	Fast-fixing Angelenos Stuck in Traffic	515 S. Flower St., 6th Floor	Los Angeles, CA 90071
Public	Sharron Collis	N/A	17217 Lake Spring Ave.	Palmdale, CA 93591
Public	Joseph Sanderson	N/A	810 S. Spring Street Apt 901	Los Angeles, CA 90014
Public	David J. Bottjer	N/A	2125 Bonsallo Ave.	Los Angeles, CA 90007
Public	Steve Gibson	N/A	3982 S. Figueroa St. Suite 207	Los Angeles, CA 90037
Public	Eimon Smith	LAUSD	333 S. Beaudry Ave. 21st Floor	Los Angeles, CA 90017
Public	Lore Hilburg	N/A	1943 Buckingham Road	Los Angeles, CA 90016
Public	Patsy Carter	N/A	657 West 23rd Street	Los Angeles, CA 90007
Public	Patsy Carter	N/A	663 West 23rd Street	Los Angeles, CA 90007
Public	Lisa Carter-Davis	N/A	657 W. 23rd Street #2	Los Angeles, CA 90007
Pubic	John Arnold	N/A	2166 W. 30th Street	Los Angeles, CA 90018
Public	Kevin Sanada	National Trust for Historic Preservation	700 S. Flower St. Suite 1100	Los Angeles, CA 90017
Public	Andrea Canty	NANDC	P.O. Box 18769	Los Angeles, CA 90018
Public	Sara Veles	N/A	1122 W. 24th Street	Los Angeles, CA 90007
Public	Yosef Azri'el	N/A	1344 W. 29th Street	Los Angeles, CA 90007
Public	Jeffery C. Mchellan	St. John's Church	623 N. Bandini St.	San Pedro, CA 90731
Public	Rev. Catherine Roskam	St. James Church	3903 Wilshire Blvd.	Los Angeles, CA 90010
Public	Cindy L. Heitzman	California Preservation Foundation	5 Third St. Suite 424	San Francisco, CA 91403
Public	Roland Souza	N/A	1724 Westmoreland Ave	Los Angeles, CA 90006

Agency/Public/ Elected Official	Name	Affiliation	Address	City, State, Zip Code
Public	Mitzi March Mogul	WAHA	1725 Wellington Rd.	Los Angeles, CA 90010
Library		Jefferson Library	2211 West Jefferson Blvd.	Los Angeles, CA 90018
Library		Vermont Square Branch Library	1201 West 48th Street	Los Angeles, CA 90037
Library		Vernon Branch Library	4504 S. Central Ave.	Los Angeles, CA 90011
Elected Official	The Honorable Dr. Ed Hernandez	California State Senator #22	100 S. Vincent Ave. Ste. 401	West Covina, CA 91790
Elected Official	The Honorable Adrin Nazarian	California State Assembly Member 46th	6150 Van Nuys Blvd Suite 300	Van Nuys, CA 91401
Elected Official	The Honorable Barbara Boxer	US Senator	501 I Street, Suite 7-600	Sacramento, CA 95814-7308
Elected Official	The Honorable Dianne Feinstein	US Senator	11111 Santa Monica Blvd. Suite 915	Los Angeles, CA 90025-3343
Elected Official	The Honorable Marqueece Harris-Dawson	City Council Member, 8th District (City of Los Angeles)	200 N. Spring Street, Room 450	Los Angeles, CA 90012
Elected Official	The Honorable Ted Lieu	US Representative, District 33	5055 Wilshire Blvd. Suite 310	Los Angeles, CA 90036
Elected Official	The Honorable Eric Garcetti	Mayor (City of Los Angeles)	14410 Sylvan St. #211	Van Nuys, CA 91401
Elected Official	The Honorable Gilbert Cedillo	City of Los Angeles City Council Member 1st District	200 N. Spring Street Room 460	Los Angeles, CA 90012
Elected Official	The Honorable Curren D. Price, JR.	Council Member 9th District	4301 S. Central Ave	Los Angeles, CA 90011
Elected Official	The Honorable Jose Huizar	City of Los Angeles Council Member 14th District	200 N. Spring Street Rm 465	Los Angeles, CA 90012
Elected Official	The Honorable Hilda Solis	Board of Supervisors, 1st District	Kenneth Hahn Hall of Administration 500 West Temple St.	Los Angeles, CA 90012
Elected Official	The Honorable Mark Ridley –Thomas	Supervisor, 2nd District	500 West Temple Street Room 866	Los Angeles, CA 90012
Elected Official	The Honorable Xavier Becerra	U.S. House of Representatives, 34th District	350 South Bixel Street Suite 120	Los Angeles, CA 90017
Elected Official	The Honorable Kevin de Leon	California State Senator	1808 West Sunset Blvd.	Los Angeles, CA 90026
Elected Official	The Honorable Miguel Santiago	State Assembly Member	320 West 4th Street Room 1050	Los Angeles, CA 90013

Appendix A Resources Evaluated Relative to the Requirements of Section 4(f)

This section of the document discusses parks, recreational facilities, wildlife refuges and historic properties found within or adjacent to the project area that do not trigger Section 4(f) protection either because: 1) they are not publicly owned, 2) they are not open to the public, 3) they are not eligible historic properties, 4) the project does not permanently use the property and does not hinder the preservation of the property, or 5) the proximity impacts do not result in constructive use. No parks, recreational facilities, or wildlife refuges within or adjacent to the project area will be impacted permanently or temporarily as a result of the proposed Build Alternative.

Section 4(f) protection is not triggered because the project does not permanently use any historical property and does not hinder the preservation of the property. Further, the proximity impacts to historical properties do not result in constructive use. A constructive use occurs when the project's proximity impacts are so severe that the protected activities, features or attributes that qualify the resource for protection under Section 4(f) are "substantially impaired." Substantial impairment occurs only when the protected activities, features or attributes are substantially diminished by the proposed project. On April 12, 2016 a field visit was conducted with Caltrans and Consulting Parties, and the advisory council concurred with Caltrans that there is no constructive use as a result of this project. The Section 4(f) determination has been agreed upon by HQ Environmental Coordinator Chris Flynn and HQ Section 4(f) expert Laura Loeffler per telephone discussion on July 28, 2015.

Further, the Historical Property Survey Report prepared for the project concluded that there is an adverse effect on Historical Properties within the project vicinity. Specifically a visual intrusion (under Section 106 Compliance), but a Memorandum of Agreement has been prepared in consultation with the State Historic Preservation Officer and after the avoidance, minimization, and/or mitigation measures are implemented the visual intrusion will be less than significant. In other words, the proximity impacts do not result in constructive use. Therefore, the provisions of Section 4(f) are not triggered.

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Appendix B Title VI Policy Statement

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE DIRECTOR
P.O. BOX 942873, MS-49
SACRAMENTO, CA 94273-0001
PHONE (916) 654-6130
FAX (916) 653-5776
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

May 2017

NON-DISCRIMINATION POLICY STATEMENT

The California Department of Transportation, under Title VI of the Civil Rights Act of 1964, ensures *"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."*

Related federal statutes and state law further those protections to include sex, disability, religion, sexual orientation, and age.

For information or guidance on how to file a complaint, please visit the following web page: http://www.dot.ca.gov/hq/bep/title_vi/t6_violated.htm.

To obtain this information in an alternate format such as Braille or in a language other than English, please contact the California Department of Transportation, Office of Business and Economic Opportunity, 1823 14th Street, MS-79, Sacramento, CA 95811. Telephone (916) 324-8379, TTY 711, email Title.VI@dot.ca.gov, or visit the website www.dot.ca.gov.

MALCOLM DOUGHERTY
Director

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

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Appendix C Avoidance, Minimization, and/or Mitigation Measures (Environmental Commitment Record)

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Mitigation P&B-1: Re-design Figueroa Way to encourage pedestrian and bicycle use. This may include upgrading sidewalks, improving lighting, landscaping, adding a bike pathway or lane on Figueroa Way, and signage to ensure the safety of pedestrians, bicyclists, and persons with disabilities that use Figueroa Way as a short cut to access the surrounding community.	Design/Landscape/Cultural Resources	Design Stage
Minimization BUS-1: The Metro Silver Line bus stop on Figueroa Way will be consolidated with the currently existing bus stop on Figueroa Street and 23rd Street. Therefore, bus service will still be available.	Metro	Construction
Minimization T-1: A TMP will be implemented to minimize direct and cumulative construction impacts on the community. The TMP shall be developed in consultation with the Los Angeles Department of Transportation and the California Department of Transportation, and it shall be provided with the construction plan to the City of Los Angeles Police Department and the City of Los Angeles Fire Department prior to commencement of construction activities. The TMP shall include the following implementation plans: Public Information: Provide project updates to affected residents and businesses, including the general public, via brochures and mailers, community meetings, and web site information. Motorist Information: Provide project information using changeable message signs and ground-mounted signs. Incident Management: Implement construction zone enhanced enforcement program, freeway service patrol, and California Highway Patrol traffic handling. Traffic Management during Construction: Provide a traffic lane closure chart, detour routes, pedestrian routes, residential and commercial access routes, and temporary traffic signals during construction. Following Policies and Guidelines during Construction: Construction activities would be conducted in accordance with Caltrans guidelines.	Traffic Operations	Preparation: Pre-Construction Implementation: Construction
Mitigation CR-1: Design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the West Adams community and is sensitive to the historic qualities of St. John's Episcopal Church.	Design/Landscape/Cultural Resources	Design Stage/Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Mitigation CR-2: Caltrans will create electronic content for a smartphone traveler application (The Clio or equal) that describes and interprets previously identified historic properties and historical resources nearby the flyover. Traveler application boundaries will be: the southern limit of Interstate 10 (on the north side), South Grand Avenue and I-110 (east), Martin Luther King, Jr. Boulevard (south) and South Normandie Avenue (west). Those historic properties and historical resources would include but not be limited to: St. John's Episcopal Church, St. John's Episcopal Church Parish House, the Automobile Club of Southern California (2601 South Figueroa Street, 650 West Adams Boulevard, 661 West 27th Street,), St. Vincent de Paul Church (601 West Adams Boulevard), the Stimson House (2421 South Figueroa Street), University Park Historic Preservation Overlay Zone and Chester Place Historic District (various). The content will include historical narrative information, as well as historical photographs, and other documentation. This application will be available free to the public through smartphone application stores prior to the termination of this agreement.	Cultural Resources Unit	Preparation: Pre-Construction Implementation: Construction
Mitigation CR-3: Caltrans will design and implement interior car cards to be placed in the DASH shuttle buses that service the project area. The car cards will, to the extent possible, direct riders' attention to historic properties, historical resources, local landmarks and historic neighborhoods in the above geographic area. If possible the car cards will direct riders to the Clio or equal smartphone application. The interior car cards will be posted for a minimum of six non-consecutive months. A proof and final photograph of the installed card/cards will be submitted to SHPO.	Cultural Resources	Construction
Avoidance CR-4: If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.	Cultural Resources	Construction
Minimization CR-5: Caltrans shall submit design development plans for the area beneath the flyover to SHPO for review and comment at 60% and 90% completion. Further, SHPO will provide comments on the submittals to Caltrans within 30 calendar days of receipt. If SHPO does not comment within the time provided, Caltrans may assume that SHPO concurs and that the package. Caltrans will incorporate SHPO comments into the project plans to the fullest extent possible. If Caltrans revises project plans in response to SHPO comments, then no further review is required for that consultation package.	Cultural Resources	Design

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization WQ-1: Storm drain inlet protection will be deployed throughout the project and the roadway should be swept regularly to minimize dirt and dust.	Resident Engineer	Construction
Minimization WQ-2: Concrete wastes will be managed through the use of concrete washout facilities.	Resident Engineer	Construction
Minimization WQ-3: Temporary silt fence shall be utilized to protect existing vegetation. Location of the temporary fencing shall be shown on the project plans.	Resident Engineer	Construction
Minimization WQ-4: Various waste management, materials handling, and other housekeeping BMPs will be used throughout the duration of the project.	Resident Engineer	Construction
Minimization WQ-5: Construction sequencing will be scheduled to minimize storm water quality impacts.	Resident Engineer	Construction
Minimization WQ-6: A Water Pollution Control Plan will be prepared and implemented during the construction stage.	Resident Engineer	Construction
Minimization WQ-7: Comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES No. CAS000002) (i.e. Construction General Permit).	Resident Engineer	Construction
Minimization WQ-8: Comply with the provisions identified in the NPDES Statewide Storm Water Permit Waste Discharge Requirements for the State of California, Department of Transportation (Order No. 2012-0011-DWQ, NPDES No. CAS000003).	Resident Engineer	Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization GT-1: If the build alternative is selected, a site-specific geotechnical investigation shall be conducted prior to the detailed design phase. This investigation will determine the depth of the existing groundwater and provide recommendations for avoidance, minimization, and/or mitigation measures, if any, as appropriate.	Geotechnical Unit	Design
Avoidance PALEO-1: If during construction paleontological resources are discovered, a qualified paleontologist, will need to recover them. Construction work will be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains will be collected, evaluated and deposited in a scientific institution such as the Los Angeles Natural History Museum as a donation.	Resident Engineer /Paleontology Unit	Construction
Minimization HW-1: An Asbestos Containing Material (ACM) Survey will be performed by a certified Asbestos Consultant (CAC) and Certified Lead Inspector (CLI). This allow the contractor to apply for a National Emission Standards for Hazardous Air Pollutants (NESHAP) notification/permit with South Coast Air Quality Management (SCAQMD) prior to bridge demolition work.	Resident Engineer	Pre-Construction
Minimization HW-2: The development of a project-specific Lead Compliance Plan (LCP) and training program to ensure proper health and safety measures are implemented and complied prior to start of the removal operation will be required. Per Caltrans Standard Special Provisions (SSPs) a project-specific Lead Compliance Plan will be required prior to the minor soil disturbance, major soil disturbance (requires LCP and Excavation and Transportation Plan (ETP), removal of existing Yellow/White Thermoplastic Traffic Stripe and pavement marking (requires LCP and Debris Removal, Containment, and Disposal Work Plan), and non-aerially deposited lead soil disturbance (requires a Health and Safety Plan (HaSP) and a Hazardous Material/Waste Management Plan (HMP) at the project site.	Resident Engineer	Pre-Construction
Minimization HW-3: A TWW disposal health and safety plan will be prepared.	Resident Engineer	Pre-Construction
Minimization HW-4: A Debris Containment and Disposal Work Plan will be prepared.	Resident Engineer	Pre-Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization HW-5: Removal of yellow/white thermoplastic traffic stripes and pavement marking material shall be properly collected, stored, transported, and disposed of in accordance with State and Federal guidelines.	Resident Engineer	Construction
Minimization HW-6: If the proposed Build Alternative is selected, then a Phase I Environmental Site Assessment (ESA) and a Phase II Site Investigation (SI) will be prepared. The Phase II Site Investigation will be performed on existing corridor and new parcels to be acquired for the project. The purpose of the ESA is to recognize environmental conditions in connection with the parcels. The Phase II Site Investigation will evaluate and determine the extent/degree of contaminations on the Parcels prior to acquisition. The objective of the Site Investigation is to characterize/evaluate both soil and groundwater condition.	Hazardous Waste Unit	Design Stage
Avoidance HW-7: A comprehensive ADL site investigation will be performed in Plans Specifications and Estimates phase of the project in order to evaluate the extent of ADL contamination and to assist in evaluation of applicable ADL soil management during construction.	Hazardous Waste Unit	Design Stage
Minimization AQ-1: Compliance with Caltrans' Standard Specifications in Section 14 (2010) will be required.	Resident Engineer	Construction
Minimization AQ-2: Section 14-9.01 specifically requires compliance with all applicable laws and regulations related to air quality, including SCAQMD rules and regulations and local ordinances.	Resident Engineer	Construction
Minimization AQ-3: 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.	Resident Engineer	Construction
Minimization AQ-4: 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 as required by the SCAQMD.	Resident Engineer	Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization AQ-5: Spread soil binder on any unpaved roads used for construction purposes, and all project construction parking areas.	Resident Engineer	Construction
Minimization AQ-6: Wash off trucks as they leave the R/W as necessary to control fugitive dust emissions.	Resident Engineer	Construction
Minimization AQ-7: 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.	Resident Engineer	Construction
Minimization AQ-8: Develop a dust control plan documenting sprinkling, temporary paving, speed limits, and expedited re-vegetation of disturbed slopes as needed to minimize construction impacts to existing communities.	Resident Engineer	Pre-Construction
Minimization AQ-9: Locate equipment and materials storage sites at least 500 feet from the sensitive receptors. Keep construction areas clean and orderly.	Resident Engineer	Construction
Minimization AQ-10: Establish environmentally sensitive areas (ESAs) or their equivalent at least 500 feet away from sensitive air receptors within which construction activities such as extended idling, material storage, and equipment maintenance, would be prohibited, to the extent feasible.	Design/Resident Engineer	Design/Construction
Minimization AQ-11: 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.	Resident Engineer	Construction
Minimization AQ-12: 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.	Resident Engineer	Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization AQ-13: Promptly and regularly remove dust and mud that are deposited on paved, public roads due to construction activity and traffic to decrease particulate matter.	Resident Engineer	Construction
Minimization AQ-14: 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.	Resident Engineer	Construction
Minimization AQ-15: Install mulch or plant vegetation as soon as practical after grading to reduce windblown particulates 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.	Design/Landscape/Resident Engineer	Design and Construction
Minimization AQ-16: While unlikely, if naturally occurring asbestos, serpentine, or ultramafic rock is discovered during grading operations, Section 93105, Title 17 of the California Code of Regulations requires notification to the SCAQMD by the next business day and implementation of the following measures within 24-hours: • Unpaved areas subject to vehicle traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos; • The speed of any vehicles and equipment traveling across unpaved areas must be no more than fifteen (15) miles per hour unless the road surface and surrounding area is sufficiently stabilized to prevent vehicles and equipment traveling more than 15 miles per hour from emitting dust that is visible crossing the project boundaries; • Storage piles and disturbed areas not subject to vehicular traffic must be stabilized by being kept adequately wetted, treated with a chemical dust suppressant, or covered with material that contains less than 0.25 percent asbestos; and • Activities must be conducted so that no track-out from any road construction project is visible on any paved roadway open to the public.	Resident Engineer	Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Avoidance N-1: Equipment Noise Control will be applied to revising old equipment and designing new equipment to meet acceptable noise levels. • Mufflers are very effective devices which reduce the noise emanating from the intake or exhaust of an engine, compressor, or pump. The fitting of effective mufflers on all new equipment and retrofitting of mufflers on existing equipment is necessary to yield an immediate noise reduction at all types of road construction sites. • Sealed and lubricated tracks for crawler mounted equipment will lessen the sound radiated from the track assembly resulting from metal to soil and metal to metal contact. Contractors, site engineers, and inspectors should ensure that the tracks are kept in excellent condition by periodic maintenance and lubrication. • Lowering exhaust pipe exit height closer to the ground can result in an off-site noise reduction. Barriers are more effective in attenuating noise when the noise source is closer to ground level. • General noise control technology can have substantially quieter construction equipment when manufacturers apply state-of-the-art technology to new equipment or repair old equipment to maintain original equipment noise levels.	Resident Engineer	Construction
Minimization N-2: In-Use Noise Control where existing equipment is not permitted to produce noise levels in excess of specified limits. Any equipment that produces noise levels less than the specified limits would not be affected. However, those exceeding the limit would be required to meet compliance by repair, retrofit, or replacement. New equipment with the latest noise sensitive components and noise control devices are generally quieter than older equipment, if properly maintained and inspected regularly. They should be repaired or replaced if necessary to maintain the in-use noise limit. All equipment applying the in use noise limit would achieve an immediate noise reduction if properly enforced.	Resident Engineer	Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization N-3: Site Restrictions is an attempt to achieve noise reduction through modifying the time, place, or method of operation of a particular source. Site restrictions should be applied to achieve noise reduction through different methods, resulting in an immediate reduction of noise emitted to the community without requiring any modification to the source noise emissions. The methods include shielding with barriers for equipment and site, truck rerouting and traffic control, time scheduling, and equipment relocation. The effectiveness of each method depends on the type of construction involved and the site characteristics. Shielding with barriers should be implemented at an early stage of a project to reduce construction equipment noise. The placement of barriers must be carefully considered to reduce limitation of site access. Barriers may be natural or man-made, such as excess land fill used as a temporary berm strategically placed to act as a barrier. • Efficient rerouting of trucks and control of traffic activity on construction site will reduce noise due to vehicle idling, gear shifting and accelerating under load. Planning proper traffic control will result in efficient workflow and reduce noise levels. In addition, rerouting trucks does not reduce noise levels but transfers noise to other areas that are less sensitive to noise. • Time scheduling of activities should be implemented to minimize noise impact on exposed areas. Local activity patterns and surrounding land uses must be considered in establishing site curfews. However, limiting working hours can decrease productivity. Sequencing the use of equipment with relatively low noise levels versus with relatively high noise levels during noise sensitive periods is an effective noise control measure. • Equipment location should be as far from noise sensitive land use areas as possible. The contractor should substitute quieter equipment or use quieter construction processes at or near noise sensitive areas.	Resident Engineer	Construction
Minimization N-4: Personal Training of operators and supervisors is needed to become more aware of the construction site noise problems. Educating contractors and their employees to be sensitive to noise impact problems and noise control methods. This may be one of the most cost-effective ways to help operators and supervisors become more aware of the construction site noise problem and to implement the various methods of improving the conditions. A training program for equipment operators is recommended to instruct them in methods of operating their equipment to minimize environmental noise. Many training programs are presently given on the subject of job safety. This can be extended to include the impact due to noise and of abatement.	Resident Engineer	Pre-Construction

Environmental Commitment	Responsible Branch/Staff	Timing/Phase
Minimization GV-1: As recommended in the Noise and Vibration Manual (September, 2013), impact pile driving can be the most significant source of vibration at construction sites. The principal means of reducing vibration from impact pile driving that will most likely be used in this case will be cast-in-place or auger cast piles. This technique eliminates impact driving and limits vibration generation to the small amount generated by drilling, which is negligible.	Resident Engineer	Construction
Avoidance BIO-1: Avoid construction during bird nesting season, or at a minimum grub the vegetation outside the bird nesting season March 1st through September 1st. If this cannot be done, then a biological survey for nesting birds will be required no more than 5 days in advance of grubbing. Further, if any bird nests are found, then a buffer of 150 feet for songbirds and 500 feet for raptors will be required until the nestlings have fledged. Per the federal Migratory Bird Treaty Act.	Resident Engineer	Pre-Construction and Construction

Appendix D RTP and TIP Identifying the Proposed Project

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

2015 Federal Transportation Improvement Program

Los Angeles County - 100% Prior
Local Highway, State Highway, Transit
Federal Approved
(In $000`s)

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment
LA0D31	Los Angeles	SCAB		LA0D31	NCR88	101	15.3	16.1	S	NON-EXEMPT	12
Description:							PTC	10,232	Agency	CALTRANS	

Route 101: CONSTRUCT ONE ADDITIONAL LANE FOR BOTH NORTH AND SOUTH BOUND OFF-RAMPS AT VAN NUYS BLVD. (RIP 1 M, IIP 8 M) (EA # 199630) (PPNO 2789) (DEMO= NAT. CORRIDOR PLANNING AND BORDER DEV.)

Fund	ENG	R/W	CON	Total	Prior	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	Total
NATIONAL HWY SYSTEM - IIP			8,019	8,019	8,019							8,019
STATE CASH - IIP	2,171	42		2,213	2,213							2,213
LA0D31 Total	2,171	42	8,019	10,232	10,232							10,232

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment
LA960142	Los Angeles	SCAB		LA960142	NCRH3	101	37.54	38.03	S	NON-REPORTABLE TCM COMMITTED	0
Description:							PTC	25,758	Agency	WESTLAKE VILLAGE	

Rte 101/Lindero Canyon Road Interchange Improvement Project. Lindero Cyn Rd btw Via Colinas and Agoura Rd widened from 2 to 3 lanes in each direction. Ramp G-6 widened to 2 lanes to provide for 2 free RT lanes for eastbound Via Colinas traffic at Lindero Cyn Rd. The existing northbound aux lane will be extended southerly from its terminus at Ramp G-6 to Ramp G-3. Includes bike path construction (.49 miles).

Fund	ENG	R/W	CON	Total	Prior	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	Total
DEMO - TEA 21			244	244	244							244
CITY FUNDS	300		4,763	5,063	5,063							5,063
MEASURE R 20H - HIGHWAY CAPITAL			11,876	11,876	11,876							11,876
PROP "C25" FUNDS			8,575	8,575	8,575							8,575
LA960142 Total	300		25,458	25,758	25,758							25,758

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment
LA0G086	Los Angeles	SCAB		REG0702	PLN40	110			S	EXEMPT - 93.126	6
Description:							PTC	7,841	Agency	LOS ANGELES COUNTY MTA	

The project would construct an elevated off-ramp on the northbound(NB) I-110 between 30th Street and Figueroa Street Overcrossing (OC). This structure would bypass the bottleneck intersections at Flower and Adams Streets as well as the Adams at grade section, which connects the High Occupancy Toll Lanes (HOT Lanes) traffic to Figueroa Street.

Fund	ENG	R/W	CON	Total	Prior	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	Total
DEMO - ISTEA	6,273			6,273	6,273							6,273
LOCAL TRANS FUNDS	445			445	445							445
PROP "C25" FUNDS	1,123			1,123	1,123							1,123
LA0G086 Total	7,841			7,841	7,841							7,841

ProjectID	County	Air Basin	Model	RTP ID	Program	Route	Begin	End	System	Conformity Category	Amendment
LA0G138	Los Angeles	SCAB		1HL08D01	CAX69	110	10	22	S	NON-EXEMPT	0
Description:							PTC	3,881	Agency	LOS ANGELES COUNTY MTA	

LACRD - HOT lanes on the I-10 from Alameda St./Union Station to I-605, and on I-110 from 182 St./Artesia Transit Center to Adams Blvd. Conversion of HOV lanes to HOT lanes.(Infrastructure/pavement) (1HL08D01, 1HL08D03)

Fund	ENG	R/W	CON	Total	Prior	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	Total
CRD-77J0	800		3,081	3,881	3,881							3,881
LA0G138 Total	800		3,081	3,881	3,881							3,881

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NOTE: These projects may still require state or federal action other than funding & they are included in the 100% Prior Years listing of the 2015 FTIP for this purpose

TABLE 1 FTIP Projects - Continued

County	System	FTIP ID	Route #	Description	Project Cost ($1,000's)
LOS ANGELES	STATE HIGHWAY	LA0G930	14	LA0G930 - AVENUE L / SR138 (SR-14) INTERCHANGE OVERPASS IMPROVEMENTS & AVENUE L BIKE LANES FROM SIERRA HWY TO 15TH ST. W (1.6MI.). IMPROVEMENTS INCLUDE NON-CAPACITY INCREASING IMPROVEMENTS FOR VEHICLE, BICYCLE AND PEDESTRIAN SAFETY AND FLOW INCLUDING RESTRIPING, REALIGNMENTS, OTHER INTERSECTION CONTROL MODIFICATIONS ON AVENUE L AT THE SR-14 RAMP AND THE 15TH STREET WEST AND 10TH STREET WEST INTERSECTIONS.	$5,000
LOS ANGELES	STATE HIGHWAY	LA0D391	47	VINCENT THOMAS BRIDGE STUDY - DEVELOP AND ANALYZE ALTERNATIVES TO INCREASE NEEDED CAPACITY. SAFETEA-LU HPP # 297 NON-CAPACITY	$1,400
LOS ANGELES	STATE HIGHWAY	LA0G600	47	ROUTE 047: REPLACEMENT OF SCHUYLER HEIM BRIDGE TO INCLUDE 2 THRU LANES AND 1 AUX LANE NB; AND 3 THRU LANES AND 1 AUX LANE SB EA 13820, PPNO 0444E).	$278,993
LOS ANGELES	STATE HIGHWAY	LA0D399	60	ROUTE 60: CONSTRUCTION OF NEW PARTIAL DIAMOND INTERCHANGE FOR STATE ROUTE 60 (SR-60) AT LEMON AVE (SAFETEA-LU # 587).	$21,838
LOS ANGELES	STATE HIGHWAY	LA0D393	60	GRAND AVENUE/SR 57/60 INTERCHANGE MODIFICATION: RESTRIPE THE EXISTING GRAND AVE, ADD WB ON-RAMP AND ADD WB AUX LANE, ADD SECOND SB LFT TURN LN AT EB RAMP (09 CFP 3137)	$20,401
LOS ANGELES	STATE HIGHWAY	LAF7200	60	WB SR-60/SB SR-57 GRAND AVENUE OFF RAMP INTERCHANGE : ADD WB SR-60 AUXILIARY LANE FROM SB SR-57 TO GRAND AVENUE OFF-RAMP TO IMPROVE TRUCK MOBILITY AND REDUCE CONGESTION.	$21,303
LOS ANGELES	STATE HIGHWAY	LA0D450	60	RECONSTRUCT SR 60/GRAND AV INTERCHANGE - WIDEN GRAND AV: SB ADD 1THRU LN (2 EXSTNG); NB ADD 1 THRU LN (3 EXSTNG), REPLACE GRAND AV OC, ADD EB LOOP ON-RAMP, CONSTRUCT ADDITIONAL EB THRU LN FROM GRAND AVE TRAP LN TO SR57 ADD LN, ADD TWO BYPASS RAMP CONNECTORS, ADD AUX LNS EB AND WB FROM EAST TO WEST JUNCTION OF THE CONFLUENCE.	$257,900
LOS ANGELES	STATE HIGHWAY	LA0B951	71	ROUTE 71: ROUTE 10 TO SAN BERNARDINO COUNTY LINE - EXPRESSWAY TO FREEWAY CONVERSION - ADD 1 HOV LANE AND 1 MIXED FLOW LANE . (2001 CFP 8349, TCRP #50) (EA# 210600, PPNO 2741) (TCRP #50)	$13,392
LOS ANGELES	STATE HIGHWAY	LA0G317	71	STATE ROUTE 71 EXPANSION FROM SR 60 TO I-10 POMONA CA (ADD PA&ED ONLY).	$978
LOS ANGELES	STATE HIGHWAY	LA0G230	101	U.S. 101 FREEWAY AND PALO COMADO CANYON ROAD BRIDGE-AT CHESEBRO ROAD (PM 33.0/34.4). WIDENING OF BRIDGE FROM 2-LANES TO 4-LANES, CONSTRUCTION OF SIDEWALKS AND BIKE LANES (BIKE LANES - 0.63 MILES), MODIFICATION OF ON/OFF RAMPS, AND MODIFICATION OF VARIOUS INTERSECTIONS.	$22,590
LOS ANGELES	STATE HIGHWAY	LA0G208	101	PROJECT WILL REPLACE EXISTING 2 LANE BRIDGE WITH 4 LANE BRIDGE AND 1 TURN LANE @ LOST HILLS RD/US 101 INTERCHANGE. THIS WILL BRING BRIDGE TO CURRENT LANE CONFIGURATION OF LOST HILLS RD ON EITHER SIDE OF BRIDGE. INTERCHANGE WILL ELIMINATE CROSS-TRAFFIC MOVEMENT TO ACCESS NB US 101. THERE WILL BE NO ADDITIONAL LANES ON US 101. REPLACEMENT BRIDGE WILL BE WIDER,4 LNS RATHER THAN 2 AND WILL SPAN APPROX. 280 FT, ACCOMMODATING WIDTH OF ROAD ON EITHER SIDE OF BRIDGE STRUCTURE.	$27,000
LOS ANGELES	STATE HIGHWAY	LA0G598	101	DESIGN AND CONSTRUCTION OF A PARK AND RIDE FACILITY (31107 THOUSAND OAKS BLVD) WITH 375 PARKING SPACES AT THE PROPOSED COMMUNITY RECREATIONAL FACILITY WILL CONSTRUCTION OF A ACCESS ROAD, RETAINING WALLS TO THE PARK AND RIDE FACILITY, BUS STOP SHELTER FOR WAITING PASSENGERS, NECESSARY DRAINAGE, UTILITY AND LANDSCAPING AND IRRIGATION IMPROVEMENTS.	$5,224
LOS ANGELES	STATE HIGHWAY	LA0G606	101	THIS PROJECT WOULD REDESIGN THE INTERSECTION AT THE PARKWAY CALABASAS ON/OFF RAMP FOR THE US101. PRESENTLY, TRAFFIC QUEUES OBSTRUCT THROUGH TRAFFIC ALONG CALABASAS ROAD, AND THERE ARE NO PEDESTRIAN IMPROVEMENTS. THIS PROJECT WOULD WIDEN CALABASAS ROAD FROM MUREAU ROAD TO THE PARKWAY CALABASAS OFFRAMP AND PROVIDE BIKE LANES AND SIDEWALKS.	$2,700
LOS ANGELES	STATE HIGHWAY	LA960142	101	RTE 101/LINDERO CANYON ROAD INTERCHANGE IMPROVEMENT PROJECT. LINDERO CYN RD BTW VIA COLINAS AND AGOURA RD WIDENED FROM 2 TO 3 LANES IN EACH DIRECTION. RAMP G-6 WIDENED TO 2 LANES TO PROVIDE FOR 2 FREE RT LANES FOR EASTBOUND VIA COLINAS TRAFFIC AT LINDERO CYN RD. THE EXISTING NORTHBOUND AUX LANE WILL BE EXTENDED SOUTHERLY FROM ITS TERMINUS AT RAMP G-6 TO RAMP G-3. INCLUDES BIKE PATH CONSTRUCTION (.49 MILES).	$25,758
LOS ANGELES	STATE HIGHWAY	LA0G1024	101	(US 101 @ KANAN) KANAN CORRIDOR, BETWEEN AGOURA ROAD AND HILLRISE DRIVE. PROJECT TO INCLUDE DESIGN AND CONSTRUCTION OF ADDITIONAL LOOP RAMP LANES, WIDENING OF ROADWAY, AND ADJUSTMENT OF DRY AND WET UTILITIES.	$750
LOS ANGELES	STATE HIGHWAY	LA0G1177	110	ENHANCEMENT OF ADVANCED TRANSPORTATION MANAGEMENT SYSTEM (ATMS); INCLUDING ENHANCED INCIDENT RESPONSE IMPROVE AND ENHANCE DETECTION DATA COLLECTION AND IMPROVE INFORMATION SHARING.	$360
LOS ANGELES	STATE HIGHWAY	LA0G086	110	THE PROJECT WOULD CONSTRUCT AN ELEVATED OFF-RAMP ON THE NORTHBOUND(NB) I-110 BETWEEN 30TH STREET AND FIGUEROA STREET OVERCROSSING (OC). THIS STRUCTURE WOULD BYPASS THE BOTTLENECK INTERSECTIONS AT FLOWER AND ADAMS STREETS AS WELL AS THE ADAMS AT GRADE SECTION, WHICH CONNECTS THE HIGH OCCUPANCY TOLL LANES (HOT LANES) TRAFFIC TO FIGUEROA STREET.	$7,841

Appendix E Threatened & Endangered Species List

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
Phone: (760) 431-9440 Fax: (760) 431-5901
http://www.fws.gov/carlsbad/

In Reply Refer To: March 13, 2018
Consultation Code: 08ECAR00-2018-SLI-0682
Event Code: 08ECAR00-2018-E-01537
Project Name: EA#27800 I-110 Flyover Project

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, and proposed species, designated critical habitat, and candidate species that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
(760) 431-9440

Project Summary

Consultation Code: 08ECAR00-2018-SLI-0682

Event Code: 08ECAR00-2018-E-01537

Project Name: EA#27800 I-110 Flyover Project

Project Type: BRIDGE CONSTRUCTION / MAINTENANCE

Project Description: LA-I-110 Flyover Project

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/34.02771282380051N118.2751573196767W

Counties: Los Angeles, CA

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

Birds

NAME	STATUS
Coastal California Gnatcatcher *Polioptila californica californica* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8178	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Appendix F Section 106 MOA

MEMORANDUM OF AGREEMENT
BETWEEN THE CALIFORNIA DEPARTMENT OF TRANSPORTATION
AND THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE INTERSTATE 110 (I-110) HOTLANES FLYOVER PROJECT,
CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

WHEREAS, the Federal Highway Administration (FHWA) has assigned, and the California Department of Transportation (Caltrans, including all subordinate divisions defined below) has assumed FHWA responsibility for environmental review, consultation, and pursuant to 23 USC 327, which became effective on October 1, 2012 and applies to this Undertaking; and

WHEREAS, pursuant to the January 2014 *First Amended Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California* (Section 106 PA), Caltrans is deemed to be a federal agency for all highway-aid projects it has assumed, and in that capacity Caltrans has assigned the role of "agency official" to the Caltrans Division of Environmental Analysis (DEA) Chief for the purpose of compliance with 36 CFR 800 and is responsible for oversight of District environmental responsibilities. To provide for effective compliance, day-to-day responsibilities and coordination of the Section 106 process are further delegated to the DEA Cultural Studies Office (CSO) Chief; and

WHEREAS, Caltrans proposes to implement the federally funded Hotlanes Flyover Project (Undertaking) on Interstate 110 (I-110) in Los Angeles County, which would build an elevated northbound off-ramp between postmiles 20.10 and 20.92, as described in Attachment B; and

WHEREAS, Caltrans has consulted with the California State Historic Preservation Officer (SHPO) pursuant to Stipulations X.C, and XI of the Section 106 PA, and, where the Section 106 PA so directs, in accordance with 36 CFR Part 800, the regulation that implements Section 106 of the National Historic Preservation Act of 1966 (54 USC Section 470 (f)), as amended (NHPA), regarding the Undertaking's effects on historic properties, and has notified the Advisory Council on Historic Preservation (ACHP) and will file a copy of this Memorandum of Agreement (MOA) with the ACHP in accordance with Stipulation X.C. 3.b of the Section 106 PA; and

WHEREAS, the Undertaking's Area of Potential of Effects includes maximum existing or proposed right-of-way for the alternative under consideration, easements (temporary and permanent), all improved properties subject to temporary or permanent changes in access (ingress and egress), and areas where visual or audible changes could occur outside the required right-of-way; and

WHEREAS, Caltrans has determined that the Interstate 110 (I-110) Hotlanes Flyover Project (Undertaking) will have adverse effects on the setting and atmosphere of St. John's Episcopal Church, a property listed in the National Register of Historic Places (National Register) and on St. John's Episcopal Church Parish House, a property determined eligible for the National Register; and

WHEREAS, Caltrans in consultation with SHPO, has determined that the Undertaking's adverse effects cannot be avoided and that implementation of the treatments set forth in Stipulations I, II and III of this MOA will satisfactorily take into account the Undertaking's adverse effects on the historic properties; and

WHEREAS, Caltrans has consulted with California Preservation Foundation, Los Angeles Conservancy, St. John's Cathedral, and West Adams Heritage Association regarding the Undertaking and its adverse

effects on the subject historic properties and have invited them to sign this MOA as concurring parties; and

WHEREAS, Caltrans has initiated consultation with the Gabrielino Tongva Indians of California; the Gabrielino Tongva Nation; the Gabrielino Band of Mission Indians, the Gabrielino/Tongva San Gabriel Band of Mission Indians; the Gabrielino-Tongva Nation; the Gabrielino Ancestral Territorial Tribal Nation; Linda Candelaria, Gabrielino, and Bernie Acuna, Gabrielino, regarding the Undertaking; will continue to consult with them and will afford them, should they so desire, the further opportunity to more directly and actively participate in the implementation of the Undertaking itself and this MOA;

NOW, THEREFORE, Caltrans and the SHPO agree that, upon Caltrans' decision to proceed with the Undertaking, Caltrans shall ensure that the Undertaking is implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on the historic properties, and further agrees that these stipulations shall govern the Undertaking and all of its parts until this MOA expires or is terminated.

STIPULATIONS

Caltrans shall ensure that the following stipulations are carried out:

I. AREA OF POTENTIAL EFFECTS

The Undertaking's supplemental Area of Potential Effects (APE) is depicted as Attachment A of this MOA. The APE includes the maximum existing or proposed right-of-way for the alternative under consideration, easements (temporary and permanent), all improved properties subject to temporary or permanent changes in access (ingress and egress), and areas where visual or audible changes could occur outside the required right-of-way. In response to comments from Consulting Parties, and following a conversation with SHPO reviewers, a Supplemental APE was prepared to include additional properties in the indirect APE that may have views (or be in view) of the proposed flyover. Attachment A set forth hereunder may be amended through consultation among the MOA parties without amending the MOA proper.

II. TREATMENT OF HISTORIC PROPERTIES

Caltrans shall:

A. Caltrans will create electronic content for a smartphone traveler application (The Clio or equal) that describes and interprets previously identified historic properties and historical resources nearby the flyover. Traveler application boundaries will be: the southern limit of Interstate 10 (on the north side), South Grand Avenue and I-110 (east), Martin Luther King, Jr. Boulevard (south) and South Normandie Avenue (west). Those historic properties and historical resources would include but not be limited to: St. John's Episcopal Church, St. John's Episcopal Church Parish House, the Automobile Club of Southern California (2601 South Figueroa Street, 650 West Adams Boulevard, 661 West 27th Street,), St. Vincent de Paul Church (601 West Adams Boulevard), the Stimson House (2421 South Figueroa Street), University Park Historic Preservation Overlay Zone and Chester Place Historic District (various). The content will include historical narrative information, as well as historical photographs, and other documentation. This application will be available free to the public through smartphone application stores prior to the termination of this agreement.

B. Caltrans will design and implement interior car cards to be placed in the DASH shuttle buses that service the areas as described in Stipulation II.A. The car cards will, to the extent possible, direct riders' attention to historic properties, historical resources, local landmarks and historic neighborhoods in the above geographic area. If possible the car cards will direct riders to the Clio

or equal smartphone application. The interior car cards will be posted for a minimum of six non-consecutive months. A proof and final photograph of the installed card/cards will be submitted to SHPO.

C. Design and implement a pedestrian friendly streetscape in Caltrans right-of-way immediately beneath the flyover (at street grade or "area beneath the flyover") that includes landscaping and lighting that embraces the unique West Adams community and is sensitive to the historic qualities of St. John's Episcopal Church; and
   1. Caltrans shall submit design development plans for the area beneath the flyover to SHPO for review and comment at 60% and 90% completion.
   2. SHPO will review the design development plans to determine whether the plans conform to concepts described in paragraph A of this stipulation. SHPO will provide comments on the submittals to Caltrans within 30 calendar days of receipt. If SHPO does not comment within the time provided, Caltrans may assume that SHPO concurs and that the package meets the cited objectives.
   3. Caltrans will incorporate SHPO comments into the project plans to the fullest extent. If Caltrans revises project plans in response to SHPO comments, then no further review is required for that consultation package.
   4. Should Caltrans object to incorporation of SHPO comments into consulation packages at any stage of the project, Caltrans will provide SHPO with written explanation of that objection. Objections to the plans shall be resolved in accordance with Stipulation IV.B of this MOA.

III. DISCOVERIES, UNANTICIPATED EFFECTS AND TREATMENT OF HUMAN REMAINS

A. As legally mandated, human remains and related items discovered during the implementation of the terms of this Agreement and the Undertaking will be treated in accordance with the requirements of Health and Safety Code Section 7050.5(b). If pursuant to of Health and Safety Code Section 7050.5(c) the coroner determines that the human remains are or may be those of a Native American, then the discovery shall be treated in accordance with the provisions of Public Resources Code Sections 5097.98 (a)(d). Caltrans, as the landowner, shall ensure, to the extent possible, that the views of the Most Likely Descendent(s), as determined by the California Native American Heritage Commission, is taken into consideration when decisions are made about the disposition of Native American human remains and associated objects.

B. If Caltrans determines, during implementation of the terms of this MOA or after construction of the Undertaking has commenced, that the Undertaking will affect a previously unidentified property that may be eligible for listing in the National Register, or affect a known historic property in an unanticipated manner, Caltrans will address the discovery or unanticipated effect in accordance with 36 CFR Section 800.13(b)(3). Caltrans at its discretion may hereunder assume any discovered property to be eligible for the National Register in accordance with 36 CFR Section 800.13.

IV. ADMINISTRATIVE PROVISIONS

A. STANDARDS

1. **Definitions**. The definitions provided at 36 CFR Section 800.16 are applicable throughout this MOA.

2. Parties to this agreement are defined as follows:

a. **Signatory parties** have the sole authority to execute, amend, or terminate the MOA.

b. **Invited signatories** have the authority to amend or terminate the MOA.

c. **Concurring parties** signing the MOA do so to acknowledge their agreement or concurrence with the MOA, but have no legal authority under the MOA to terminate or amend the MOA. Concurring with the terms of the MOA does not constitute their agreement with the Undertaking.

d. **Professional Qualifications.** Caltrans shall ensure that the actions and products required by Stipulation II of this MOA shall be carried out by or under the direct supervision of persons meeting the *Secretary of the Interior's Professional Qualification Standards for Archeology and Historic Preservation* (36 CFR Part 61) in the relevant field of study.

B. RESOLVING OBJECTIONS

1. Should any party to this MOA object at any time in writing to the manner in which the terms of this MOA are implemented, to any action carried out or proposed with respect to implementation of the MOA (other than the Undertaking itself), or to any documentation prepared in accordance with and subject to the terms of this MOA, Caltrans shall immediately notify the other MOA parties of the objection, request their comments on the objection within 15 days following receipt of Caltrans' notification, and proceed to consult with the objecting party for no more than 30 days to resolve the objection. Caltrans will honor the request of the other parties to participate in the consultation and will take any comments provided by those parties into account.

2. If the objection is resolved during the 30-day consultation period, Caltrans may proceed with the disputed action in accordance with the terms of such resolution.

3. If at the end of the 30-day consultation period, Caltrans determines that the objection cannot be resolved through such consultation, then Caltrans shall forward all documentation relevant to the objection to the ACHP, including Caltrans' proposed response to the objection. The ACHP shall provide Caltrans with its advice on the resolution of the objection within 30 days of receiving adequate documentation. Prior to reaching a final decision on the dispute, Caltrans shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories, and concurring parties, and provide them with a copy of this written response. Caltrans will then proceed according to its final decision.

4. If the ACHP does not provide its advice regarding the dispute within the 30 day time period, Caltrans may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, Caltrans shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them to the ACHP with a copy of such written response.

5. Caltrans' responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

6. Caltrans may authorize any action subject to objection under this stipulation to proceed after the objection has been resolved in accordance with the terms of this stipulation.

C. AMENDMENTS

Any signatory party to this MOA may propose that this MOA be amended, whereupon all signatory

parties shall consult for no more than 30 days to consider such amendment. The amendment will be effective on the date a copy signed by all of the original signatories is filed with the ACHP. If the signatories cannot agree to appropriate terms to amend the MOA, either signatory may terminate the agreement in accordance with Stipulation III.D, below.

D. TERMINATION

1. If this MOA is not amended as provided for in Section C of this stipulation, or if either signatory proposes termination of this MOA for other reasons, the signatory party proposing termination shall, in writing, notify the other MOA parties, explain the reasons for proposing termination, and consult with the other parties for at least 30 days to seek alternatives to termination. Such consultation shall not be required if Caltrans proposes termination because the Undertaking no longer meets the definition set forth in 36 CFR Section 800.16 (y).

2. Should such consultation result in an agreement on an alternative to termination, the signatory parties shall proceed in accordance with the terms of that agreement.

3. Should such consultation fail, the signatory party proposing termination may terminate this MOA by promptly notifying the other MOA parties in writing. Termination hereunder shall render this MOA without further force or effect.

4. If this Agreement is terminated hereunder, and if Caltrans determines that the Undertaking will nonetheless proceed, then Caltrans shall comply with the requirements of the Section 106 PA, or request the comments of the ACHP pursuant to 36 CFR Part 800.

E. DURATION OF THE MOA

The duration of this MOA shall be no more than five (5) years following the date of execution by the SHPO and Caltrans, or upon completion of the Undertaking (whichever comes first). If the terms are not satisfactorily fulfilled at that time, Caltrans shall consult with the signatories and concurring parties to extend it or reconsider its terms. Reconsideration may include continuation of the MOA as originally executed, amendment of the MOA, or termination. In the event of termination, Caltrans will comply with Stipulations III through XI of the Section 106 PA if it determines that the Undertaking will proceed notwithstanding termination of this MOA.

F. REPORTING REQUIREMENTS AND RELATED REVIEWS

Caltrans shall provide the parties to this agreement an annual update. Such updates shall include any scheduling changes proposed, any problems encountered, failures to adopt proposed mitigation measures, and any disputes and objections received in Caltrans' efforts to carry out the terms of this MOA. The update will be due no later than December 31 of each year, beginning December 31, 2018 and continuing annually thereafter throughout the duration of this MOA. At the request of any party to this MOA, or if deemed necessary at least on an annual basis, Caltrans shall ensure that one or more meetings are held to facilitate review and comments, and to resolve questions and comments.

G. EFFECTIVE DATE

This MOA will take effect on the date that it has been executed by Caltrans and the SHPO.

EXECUTION of this MOA by Caltrans and the SHPO, its filing with the ACHP in accordance with 36 CFR Section 800.6 (b)(l)(iv), and subsequent implementation of its terms, shall evidence, pursuant to 36

CFR Section 800.6 (c), that this MOA is an agreement with the ACHP for purposes of Section 110 (1) of the NHPA, and shall further evidence that Caltrans has afforded the ACHP an opportunity to comment on the Undertaking and its effects on historic properties, and that Caltrans has taken into account the effects of the Undertaking on historic properties.

MEMORANDUM OF AGREEMENT
BETWEEN THE CALIFORNIA DEPARTMENT OF TRANSPORTATION
AND THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE INTERSTATE 110 (I-110) HOTLANES FLYOVER PROJECT,
CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

SIGNATORY PARTIES:

California Department of Transportation

By _____ 4/5/18
Philip J. Stolarski, Chief — Date
Caltrans Division of Environmental Analysis

California State Historic Preservation Officer

By _____ 4/5/18
for Julianne Polanco — Date
State Historic Preservation Officer

MEMORANDUM OF AGREEMENT
BETWEEN THE CALIFORNIA DEPARTMENT OF TRANSPORTATION
AND THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE INTERSTATE 110 (I-110) FLYOVER PROJECT,
CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

INVITED SIGNATORY:

California Department of Transportation

Carrie L. Bowen

By _____ April 5, 2018
Date

Carrie Bowen, District Director
District 7, Los Angeles

MEMORANDUM OF AGREEMENT
BETWEEN THE CALIFORNIA DEPARTMENT OF TRANSPORTATION
AND THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE INTERSTATE 110 (I-110) FLYOVER PROJECT,
CITY OF LOS ANGELES, LOS ANGELES COUNTY, CALIFORNIA

CONCURRING PARTIES:

California Preservation Foundation

NO RESPONSE

By _____ _____
Cindy Heitzman, Executive Director Date

Los Angeles Conservancy

DECLINED TO SIGN

By _____ _____
Adrian Scott Fine, Director of Advocacy Date

St. John's Cathedral

DECLINED TO SIGN

By _____ _____
The Very Rev. Canon Mark Kowalewski Date

DECLINED TO SIGN

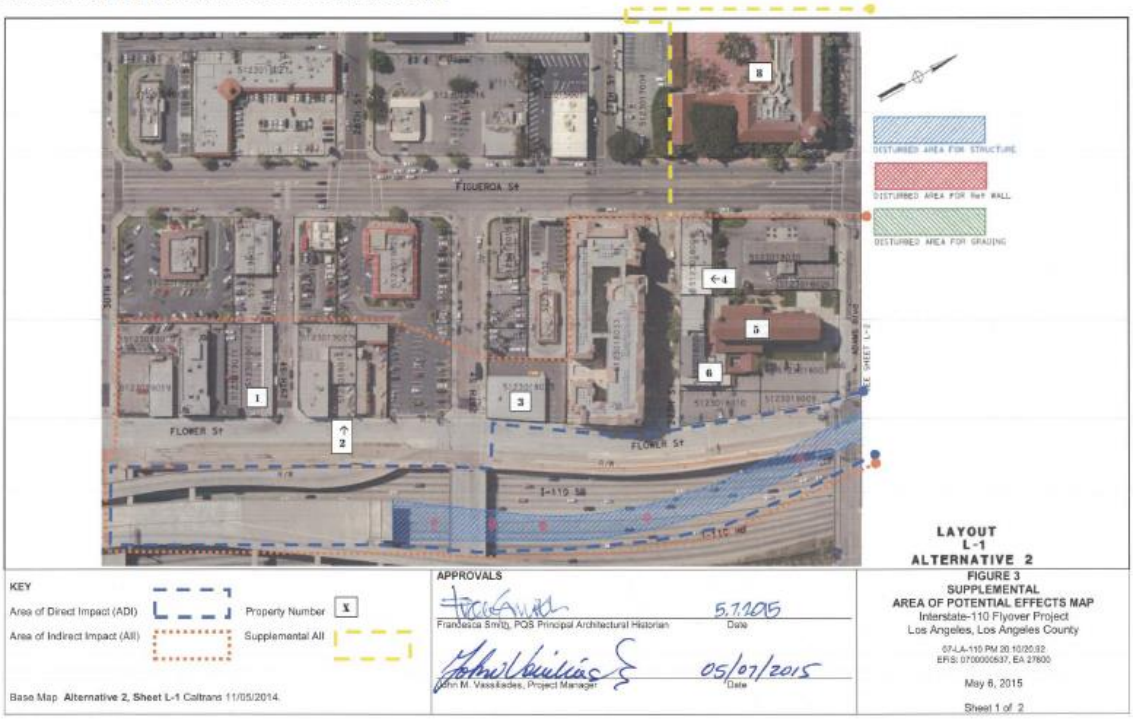
By _____ _____
The Very Rev. Canon Daniel Ade Date

West Adams Heritage Association

DECLINED TO SIGN

By _____ _____
Jean Frost, Vice-President Date

Attachment A: Supplemental Area of Potential Effects Map



Attachment B: Project Description

The California Department of Transportation (Caltrans) in cooperation with Metro proposes to construct an elevated off-ramp structure on the Northbound (NB) I-110 between 30th Street and Figueroa Street Overcrossing (OC) in the City of Los Angeles. The proposed structure would bypass the bottleneck intersections at Flower Street and Adams Boulevard (Blvd) and NB I-110 High Occupancy Toll (HOT) off ramp to Adams Blvd., connecting the HOT lane traffic to Figueroa Street. All new structures will be within State right of way; minimal right of way acquisition will be required for maintenance, ingress/egress, access control, and setback purposes as well as emergency services access. The project is being planned in coordination with the City of Los Angeles' MyFig Project, on Figueroa Street.

Alternative 1: No Build Alternative

Alternative 2: Proposed Build Alternative
This alternative proposes a two-lane flyover off-ramp connector structure (approximately 1,400 feet in length). The structure will connect from the end of the existing viaduct (the Harbor Transitway) and land at the existing Figueroa Way. Two standard lanes (12 feet in width) will be provided, with a four-foot left shoulder and eight-foot right shoulder. New column/bent locations will be located at Figueroa Way and in the I-110 mainline.
Construction of the build alternative includes the following associated work:

- Minimal right of way will be required at the westerly side of the project for maintenance , ingress/egress, access control, and setback purposes
- Removal of existing and delineation of new traffic stripes and/or pavement marking (yellow thermoplastic stripes, white thermoplastic stripes, and pavement markers);
- Upgrade or replace existing roadside signs, modify/add overhead signs for Figueroa St. Exit
- Signal upgrade/modification (off-ramp terminus at Figueroa St. intersection)
- Lighting upgrade/modification
- Drainage improvements/updates
- Utility relocation
- Landscape work

Appendix G List of Technical Studies and References Used

Technical Studies Referenced:

Air Quality Analysis Report (October 2016)

Natural Environment Study-Minimal Impacts (October 2014)

Historic Property Survey Report (April 2015)

Findings of Effect (August 2015)

Archaeological Survey Report (February 2015)

Community Impact Assessment (August 2015)

Geotechnical Study Report (April 2010)

Preliminary Foundation Report (March 2016)

Preliminary Hazardous Waste Assessment (April 2015)

Storm Water Data Report (July 2015)

Visual Impact Assessment (April 2015)

Traffic Noise Study Report (April 2015)

Paleontological Technical Review Memo (December 2014)

Traffic Study Report Addendum (April 2015)

Documents Referenced:

Community Impact Assessment Caltrans Environmental Reference Environmental Handbook Volume 4 (October 2011).

Profile of the City of Los Angeles, Southern California Association of Governments (May 2013).

Profile of Los Angeles County Southern California Association of Governments (May 2013).

Draft West Adams, Baldwin Hills, Leimert Community Plan (September 2012).

Draft South Los Angeles Community Plan (December 2012).

Southeast Los Angeles Community Plan (April 2014).

Interstate 110 Harbor Freeway/Transitway) High-Occupancy Toll Lanes Project Draft Environmental Impact Report/ Environmental Assessment (February 2010).

Interstate 110 HOT Lanes Project, Community Impact Assessment (March 2010).

California Department of Transportation (Caltrans) Environmental Handbook Volume 4—Community Impact Assessment (2011).

I-110 High Occupancy Toll/HOV (HOT) Elevated Northbound off-ramp @ Adams Blvd. Addendum Traffic Study Report (December 2014).

Interstate 110/C Street Interchange Project (September 2011).

2010 City of Los Angeles Bicycle Plan (March 2011).

City of Los Angeles Figueroa and Adams Student Housing Project Environmental Impact Report (August 2010).

City of Los Angeles Housing Needs Element 2013-2021 (December 2013).

Caltrans Construction Site Best Management Practices (BMPs) Field Manual and Trouble -Shooting Guide (January 2003).

Caltrans Stormwater Quality Construction site Best Management Practices Manual (March 2003)

Los Angeles River Watershed Summary (2004/2005).

Figueroa and Adams Student Housing Project Final EIR (August 2010).

SR-74 Lower Ortega Highway widening Draft EIR Cumulative Impacts Methodology (November 2008).

Noise and Vibration Manual (September 2013).

Websites Accessed:

http://en.wikipedia.org/wiki/West_Adams,_Los_Angeles#Recreation_and_parks, date accessed: September 17, 2014.

http://cityplanning.lacity.org/ Date accessed September 17, 2014.

http://en.wikipedia.org/wiki/North_University_Park,_Los_Angeles accessed October 6, 2014.

http://www.laalmanac.com/population/po24la.htm accessed October 6, 2014.

http://www.city-data.com/us-cities/The-West/Los-Angeles-Economy.html accessed October 6, 2014.

http://www.labormarketinfo.edd.ca.gov/cgi/dataBrowsing/localAreaProfileQSResults.asp?menuChoice=localareapro&state=true&geogArea=0604000037&selectedArea=Los%20Angeles%20County accessed October 6, 2014.

http://cityplanning.lacity.org/EIR/WestAdams/DEIR/4.14%20Public%20Services.pdf accessed October 9, 2014.

http://planning.lacity.org/EIR/WestAdams/DEIR/index.html accessed October 9, 2014.

http://cityplanning.lacity.org/ accessed October 9, 2014.

http://www.myfigueroa.com/project_details My Fig Project accessed December 11, 2014.

http://cityplanning.lacity.org/cwd/framwk/chapters/03/031.htm accessed December 11, 2014.

http://planning.lacounty.gov/assets/upl/project/gp_2035_Chapter6_2014.pdf accessed December 11, 2014.

http://www.dot.ca.gov/ser/Growthrelated_IndirectImpactAnalysis/gri_guidance.htm#intro Date accessed February, 2015.

http://reconnectingamerica.org/laequityatlas/index.php date accessed Feb. 17, 2015.

http://maps.latimes.com/neighborhoods/region/south-la/ February 24, 2015.

http://maps.latimes.com/neighborhoods/region/southeast/ February 24, 2015.

http://www.ladowntownnews.com/development/the-development-boom-updates-on-downtown-projects/article_bb7a82f0-9da6-11e3-9de8-0019bb2963f4.html Date accessed Feb. 25, 2015.

http://www.dot.ca.gov/ser/cumulative_guidance/downloads/Approach_and_Guidance.pdf Feb. 25, 2015.

http://upcmasterplan.usc.edu/draft_master_plan/potential/Date accessed March 2, 2015.

http://planning.lacity.org/MapGallery/Image/CPA/Landuse_PDF/Landuse(P) _SLA.pdf Date accessed March 2, 2015.

http://www.myfigueroa.com/about Accessed March 5, 2015.

http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting date accessed April 2, 2015.

http://www.scag.ca.gov/Documents/LosAngeles.pdf date accessed April 3, 2015.

http://quickfacts.census.gov/qfd/states/06/0644000.html date accessed May 7, 2015.

http://www.dot.ca.gov/hq/construc/stormwater/CSBMPM_303_Final.pdf date accessed May 19, 2015.

https://en.wikipedia.org/wiki/Harbor_Transitway date accessed August 18, 2015.

https://en.wikipedia.org/wiki/Interstate_110_and_State_Route_110_(California) date accessed August 18, 2015.

http://www.ladowntownnews.com/development/downtown-development-updates-on-projects/article_6886af8a-fb4a-11e4-80e3-f76f86390038.html Date accessed August 19, 2015.

http://la.curbed.com/archives/categories/downtown.php date accessed August 19, 2015.

http://www.opr.ca.gov/m_stateclearinghouse.php date accessed August 19, 2015.

http://www.ladowntownnews.com/development/downtown-development-the-latest-info-on-projects/article_2a053130-bb96-11e4-9594-bf648964a1c6.html date accessed August 19, 2015.

http://www.city-data.com/city/Los-Angeles-California.html Date accessed August 20, 2015.

http://www.census.gov/quickfacts/table/INC110213/06037,00 date accessed August 21, 2015.

https://en.wikipedia.org/wiki/Harbor_Transitway date accessed September 7, 2015.

http://www.lanlt.org/parks-and-gardens.php date accessed September 9, 2015.

http://www.laparks.org/dos/parks/facility/stJamesPk.htm date accessed September 9, 2015.

http://ladot.lacity.org/WhatWeDo/Safety/PedestrianSafety/index.htm date accessed September 10, 2015.

http://www.metro.net/projects/exposition/ date accessed September 10, 2015.

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http://geology.com/usgs/liquefaction/date accessed September 11, 2015.

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Appendix H List of Acronyms

A

AB: Assembly Bill

ACHP: Advisory Council on Historic Preservation

ADA: Americans with Disabilities Act

ADL: aerially deposited lead

ADT: average daily traffic

AE: Adverse Effect

AHERA: Asbestos Hazard Emergency Response Act

AIRFA: American Indian Religious Freedom Act

APCD: Air Pollution Control District

APE: Area of Potential Effects

AQMD: Air Quality Management District

ARB: Air Resources Board

ARPA: Archaeological Resources Protection Act of 1979

ASR: Archaeological Survey Report

ASTM: American Society for Testing Materials

ATCM: Airborne Toxic Control Measure

AVO: Average Vehicle Occupancy

B

BA: Biological Assessment

BFE: Base Flood Elevation

BIA: Bureau of Indian Affairs

BLM: Bureau of Land Management

BMP: Best Management Practice

BTU: British thermal unit

C

CAA: Clean Air Act

CCAA: California Clean Air Act

CCC: California Conservation Corps

CCR: California Code of Regulations

CDFW: California Department of Fish and Wildlife

CEQ: Council on Environmental Quality

CEQA: California Environmental Quality Act

CERLA: Comprehensive Environmental Response, Compensation, and Liability Act

CESA: California Endangered Species Act

CFR: Code of Federal Regulations

CGS: California Geological Survey

CHRIS: California Historical Resources Information System

CIA: Community Impact Assessment

CIDH: cast-in-drilled-hole

CL: center line

CMP: Conceptual Mitigation Plan

CNEL: community noise equivalent level

CNPS: California Native Plant Society

CO: carbon monoxide

CO2: carbon dioxide

COG: Council of Governments

CRHR: California Register of Historical Resources

CRM: Cultural Resources Management

CSO: Cultural Studies Office

Caltrans/ CT: California Department of Transportation

CTC: California Transportation Commission

CTP: California Transportation Plan

CWA: Clean Water Act

D

dBA: A-weighted decibel

dBA Leq: A-weighted noise level

DED: draft environmental document

DES-OE: Division of Engineering Services-Office Engineer

DNAC: District Native American Coordinator

DOC: California Department of Conservation

DOI: Department of the Interior [U.S.]

DOT: Department of Transportation [general]

DPR: Draft Project Report

DPR: California Department of Parks and Recreation

DSA: Disturbed Soil Area

DSI: Detailed Site Investigation

DTSC: California Department of Toxic Substances Control

DWR: California Department of Water Resources

E

EA: Environmental Assessment [NEPA}

EA: Expenditure Authorization

EBC: Environmental Branch Chief

ECR: Environmental Commitments Record

ED: environmental document

EFH: Essential Fish Habitat

EJ: Environmental Justice

EO: Executive Order

ESA: Environmentally Sensitive Area

ESA: Endangered Species Act

F

FAE: Finding of Adverse Effect

FED: final environmental document

FESA: Federal Endangered Species Act

FHWA: Federal Highway Administration

FNAE: Finding of No Adverse Effect

FOE: Finding of Effect

FOIA: Freedom of Information Act

FONSI: Finding of No Significant Impact [NEPA]

FPPA: Farmland Protection Policy Act

FR: Federal Register

FTA: Federal Transit Authority

FSTIP: Federal State Transportation Improvement Program

FTIP: Federal Transportation Improvement Program

G

GHG: greenhouse gas

H

HASR: Historic Architectural Survey Report

HCM: Highway Capacity Manual

HCP: Habitat Conservation Plan

HDM: Highway Design Manual

HMDD-A: Hazardous Materials Disclosure Document-Acquisition

HMDD-D: Hazardous Materials Disclosure Document-Disposal

HOT: High-Occupancy Toll

HOV: High-Occupancy Vehicle

HPSR: Historic Property Survey Report

HRCR: Historical Resources Compliance Report

HRER: Historical Resources Evaluation Report

HSWA: Hazardous and Solid Waste Amendments

I

IS: Initial Study [CEQA]

ISA: Initial Site Assessment

J

JD: Jurisdictional Determination

K

KP: kilometer post

L

LEDPA: Least Environmentally Damaging Practicable Alternative

LOS: Level of Service

LUST: leaking underground storage tank

LWCFA: Land and Water Conservation Fund Act of 1965

M

MBTA: Migratory Bird Treaty Act

MCCE: Mitigation and Compliance Cost Estimate

MND: Mitigated Negative Declaration [CEQA]

MSAT: Mobile Source Air Toxics

MTP: Metropolitan Transportation Plan

MTIP: Metropolitan Transportation Improvement Program

N

NAAQS: National Ambient Air Quality Standards

NAC: Noise Abatement Criteria

NADR: Noise Abatement Decision Report

NAE: No Adverse Effect

NAGPRA: Native American Graves Protection and Repatriation Act of 1990

NAHC: Native American Heritage Commission

ND: Negative Declaration [CEQA]

NEPA: National Environmental Policy Act

NES: Natural Environment Study

NES-MI: Natural Environmental Study (Minimal Impact)

NESHAP: National Emissions Standards for Hazardous Air Pollutants

NHL: National Historic Landmark

NHPA: National Historic Preservation Act

NOA: naturally occurring asbestos

NOC: Notice of Completion

NOD: Notice of Determination

NOE: Notice of Exemption

NOI: Notice of Intent

NOP: Notice of Preparation

NOx: nitrogen oxide

NPDES: National Pollutant Discharge Elimination System

NPL: National Priorities List

NR: National Register [of Historic Places]

NRHP: National Register of Historic Places

NSSP: Nonstandard Special Provision

NWP: Nationwide Permit

O

O.C.: Overcrossing

OHP: [California] Office of Historic Preservation

OPR: [California] Office of Planning and Research

OSHA: Occupational Safety Hazard Administration

P

PA&ED: Project Approval and Environmental Document

PAM: Permits, Agreements, and Mitigation

Pb: lead

PDPM: [Caltrans] Project Development Procedures Manual

PDT: Project Development Team

PEAR: Preliminary Environmental Assessment Report

PM: particulate matter

PM: post mile

PM10: particulate matter less than 10 microns in diameter

PM2.5: particulate matter less than 2.5 microns in diameter

POAQC: Project of Air Quality Concern

ppb: parts per billion

ppm: parts per million

PR: Project Report

PRC: [California] Public Resources Code

PS&E: Plans, Specifications, and Estimates

PSI: Preliminary Site Investigation

PSI: pounds per square inch

PSR: Project Study Report

PSR-PDS: Project Study Report-Project Development Support

PUC: Public Utilities Commission [California]

Q

R

RE: Resident Engineer

RIP: Regional Improvement Program

ROD: Record of Decision [NEPA]

ROW: right-of-way

RP: Responsible Party

RTIP: Regional Transportation Improvement Program

RTP: Regional Transportation Plan

RTPA: Regional Transportation Planning Agency

RWQCB: Regional Water Quality Control Board

S

SAFETEA-LU: Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users

SB: Senate Bill

SCAG: Southern California Association of Governments

SCH: [California] State Clearinghouse

SER: Standard Environmental Reference

SHA: State Highway Agency

SHBSB: State Historical Building Safety Board

SHL: State Historical Landmark

SHOPP: State Highway Operation and Protection Program

SHPO: State Historic Preservation Officer

SHS: State Highway System

SI: Safety Index

SIP: State Implementation Plan

SLC: [California] State Lands Commission

SOC: Statement of Overriding Considerations [CEQA]

SOL: Statute of Limitations

SR: State Route

SSP: Standard Special Provision

STIP: Statewide Transportation Improvement Program

SWMP: Storm Water Management Plan

SWPPP: Storm Water Pollution Prevention Plan

SWRCB: State Water Resources Control Board

T

TIP: Transportation Improvement Program

TMDL: Total Maximum Daily Load

TMP: Traffic Management Plan

TSM: Transportation Systems Management

U

U.C.: Undercrossing

U.S. EPA: United States Environmental Protection Agency

USACE: United States Army Corps of Engineers

USC: United States Code

USFWS: United States Fish and Wildlife Service

USGS: United States Geological Survey

UST: underground storage tanks

V

V/C: Volume/Capacity

VMT: Vehicle Miles of Travel

VOC: volatile organic compounds

W

WPCP: Water Pollution Control Program

X

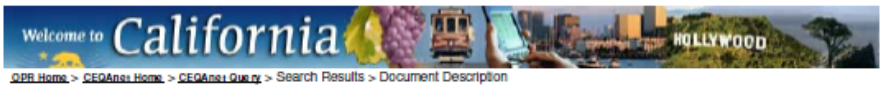
Y

Z

Appendix I CA State Clearinghouse Filing Information

California Home

Wednesday, March 28, 2018



OPR Home > CEQAnet Home > CEQAnet Query > Search Results > Document Description

I-110 High-Occupancy Toll Lane Flyover Project

SCH Number: 2013021002

Document Type: MND - Mitigated Negative Declaration

Alternate Title: I-110 HOV/HOT Connector Project

Project Lead Agency: Caltrans #7

Project Description

Note: Review Per Lead Caltrans in cooperation with Metro proposes to construct an elevated off-ramp structure on the Northbound (NB) Interstate 110 (I-110) between 30th Street and Figueroa Street Over-crossing (OC) in the City of Los Angeles. The proposed structure would bypass the bottlenecks intersections at Flower Street and Adams Blvd. and NB I-110 High Occupancy Toll (HOT) off-ramp to Adam Blvd., connecting the HOT lane traffic to Figueroa Street.

Contact Information

Primary Contact:
Allison Morrow
California Department of Transportation, District 7
213-897-3247
100 South Main Street, Suite 100, MS-16A
Los Angeles, CA 90012

Project Location

County: Los Angeles
City: Los Angeles, City of
Region:
Cross Streets: Northbound I-110 between 30th Street and Figueroa Street Over-crossing
Latitude/Longitude:
Parcel No:
Township:
Range:
Section:
Base:
Other Location Info:

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use: Commercial, industrial, open space, and residential multiple family land use designations

Development Type

Transportation: Other (Elevated off-ramp structure)

Local Action

Project Issues

Aesthetic/Visual, Air Quality, Archaeologic-Historic, Biological Resources, Drainage/Absorption, Economics/Jobs, Geologic/Seismic, Noise, Population/Housing Balance, Public Services, Recreation/Parks, Schools/Universities, Soil Erosion/Compaction/Grading, Solid Waste, Toxic/Hazardous, Traffic/Circulation, Water Quality, Water Supply, Landuse, Cumulative Effects

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Caltrans, District 6; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Native American Heritage Commission

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