

Interstate 405 at Arbor Vitae Street New South Half Interchange Project

LOS ANGELES COUNTY, CALIFORNIA
DISTRICT 7 – LA – 405 (PM 22.2/23.4)
491600

Environmental Assessment (EA) with Finding of No Significant Impact (FONSI)



Prepared by the
State of California Department of Transportation

The environmental review, consultation, and any other action advised 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 U.S.C. 327.



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CALIFORNIA DEPARTMENT OF TRANSPORTATION
FINDING OF NO SIGNIFICANT IMPACT (FONSI)

FOR

I-405 Arbor Vitae Street South Half Interchange (PM 22.2/23.4)

The California Department of Transportation (Caltrans) has determined that the No Build Alternative (Alternative 1) will have no significant impact on the environment. This FONSI is based on the attached 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 EIS is not required. Caltrans takes full responsibility for the accuracy, scope, and content of the attached EA (and other documents as appropriate).

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 U.S.C. 327.

June 30, 2010

Date



RONALD KOSINSKI

Deputy District Director

Division of Environmental Planning

Caltrans District 7

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The State of California Department of Transportation proposes to construct a New South Half Interchange, on Interstate 405, from approximately Arbor Vitae Street to Century Boulevard, postmile 22.2 to postmile 23.4, in the City of Inglewood

**ENVIRONMENTAL ASSESSMENT
with Findings of No Significant Impact (FONSI)**

Submitted Pursuant to:
(Federal) 42 USC 4332(2)(C)

THE STATE OF CALIFORNIA

Department of Transportation

June 30, 2010
Date of Approval


Ron Kosinski
Deputy District Director
Division of Environmental Planning, District 7
California Department of Transportation

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ACRONYMS

I-5	Interstate Route 5 Freeway	MPO	Metropolitan Planning Organization
I-105	Interstate Route 105 Freeway	NAAQS	National Ambient Air Quality Standards
I-405	Interstate Route 405 Freeway	NEPA	National Environmental Policy Act
I-605	Interstate Route 605 Freeway	NHPA	National Historic Properties Act
Section 4(f)	Use of Parkland	NO ₂	Nitrogen dioxide
Section 404	ACOE Permit process	O ₃	Ozone
Section	Streambed Alteration Agreement	PA/ED	Project Approval/Environmental Document
1601	Americans with Disabilities Act	PH	Public Hearing
ADA	Aerially deposited lead	PM	Particulate matter
ADL	Average Daily Traffic	PR	Project Report
ADT	Area of Potential Effect	RTIP	Regional Transportation Improvement Plan
APE	Air Quality Management Plan	RTP	Regional Transportation Plan
AQMP	Air Resource Board	RWQCB	Regional Water Quality Control
ARB	Best Management Practices	SB	Southbound
BMP	California Department of Transportation	SCAB	South Coast Air Basin
Caltrans	Transportation	SCAQMD	South Coast Air Quality Management District
CARB	California Air Resources Board	SCAG	Southern California Association of Governments
CDFG	California Department of Fish & Game	SCH	State Clearinghouse
CEQ	Council of Environmental Quality	SHPO	State Historic Preservation Officer
CEQA	California Environmental Quality Act	SIP	State Implementation Plan
CESA	California Endangered Species Act	SO ₂	Sulfur dioxide
CIA	Community Impact Assessment	STIP	State Transportation Improvement Plan
CO	Carbon Monoxide	SWPPP	Storm Water Pollution Prevention Plan
DOT	Department of Transportation	SWRCP	State Water Resource Control Board
EA	Environmental Assessment	TDM	Transportation Demand Management
ED	Environmental Document	TIP	Transportation Improvement Plan (Federal)
EPA	Environmental Protection Agency	TMP	Traffic Management Plan
FEMA	Federal Emergency Management Agency	TSM	Transportation System Management
FESA	Federal Endangered Species Act	USDOT	U. S. Department of Transportation
FHWA	Federal Highway Agency	USFWS	U. S. Fish and Wildlife Service
FONSI	Finding Of No Significant Impact	VIA	Visual Impact Assessment
FTIP	Federal Transportation Improvement Plan	VMT	Vehicle miles traveled
FWS	US Fish and Wildlife Service		
HPSR	Historic Property Survey Report		
IS	Initial Study		
ISA	Initial Site Assessment (HW)		
LAX	Los Angeles Airport		
Leq	Unit that measures sound levels via their energy output per hour		
LOS	Level of Service		

Changes have been made to this environmental document since the circulation of the draft environmental document. Comments received during the circulation of the Draft IS/EA, the public hearing process, and agency consultations have resulted in refinements that have been incorporated in this environmental document. A vertical line in the margin indicates changes in the document.

No physical changes will take place as a result of this project. Therefore, no CEQA classification is included in this document because the No Build Alternative was designated as the Preferred Alternative. No mention of CEQA is included in this document.

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CHAPTER 1 | PROPOSED PROJECT

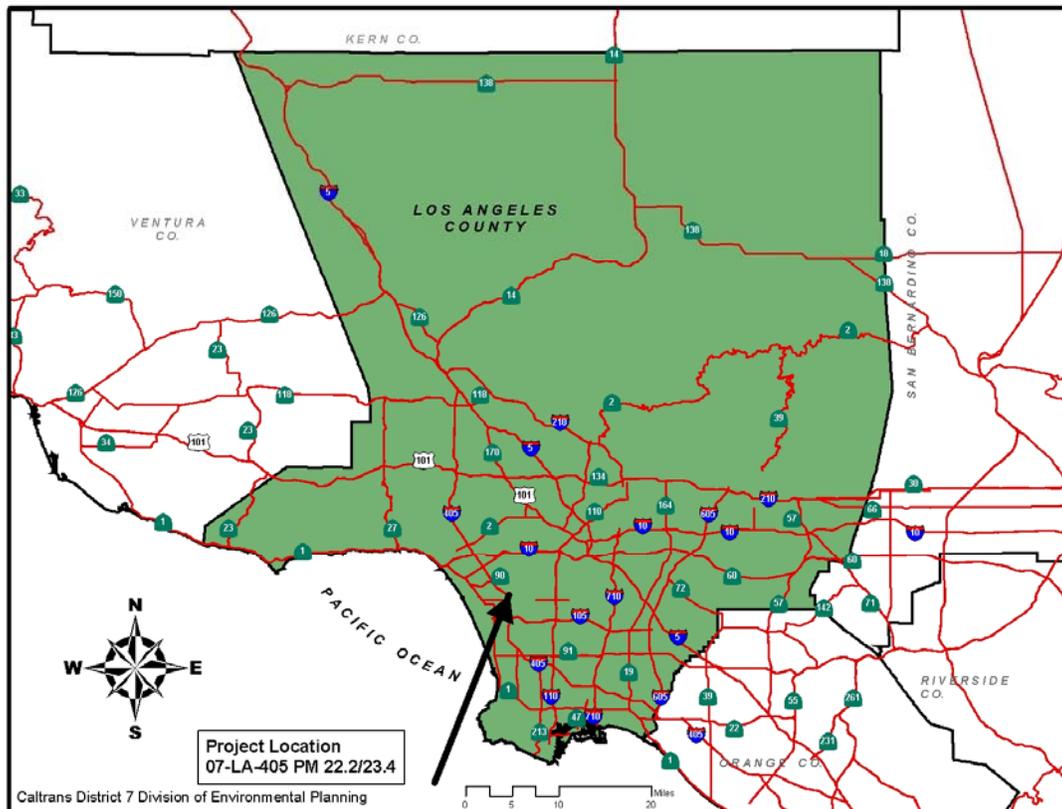
The Interstate 405 (San Diego Freeway)/Arbor Vitae Street Half Interchange Project

1.1 INTRODUCTION

1.1.1 CURRENT PROJECT

The Interstate Route-405 (I-405), also known as the San Diego Freeway, is an interstate/interregional commuter freeway that originates at Interstate Route-5 (I-5), in the City of Irvine, in Orange County, and ends at I-5 near the community of Mission Hills in the City of Los Angeles, the County of Los Angeles. I-405 is part of the National Highway System and is a north/south route that is classified as an Urban Principle Arterial. This freeway traverses in a north-south direction within the Project Study Area, serving the Cities of Los Angeles and Inglewood in Los Angeles County. Interstate Route-105 (I-105), also known as the Century Freeway, is an interstate/interregional commuter freeway that originates at West Imperial Highway in El Segundo, the County of Los Angeles, and ends at Interstate 605 (I-605) in the City of Norwalk in the County of Los Angeles. Interstate 105 traverses in an east-west direction less than a mile south of the Project Study Area, and serves the Cities of Los Angeles, Inglewood and Hawthorne and the communities of Del Aire and Lennox in Los Angeles County.

Figure 1-01. Regional Project Location



Map created by Sarah Berns/Caltrans District 7 Division of Environmental Planning

The California Department of Transportation (“Caltrans”), the lead agency under NEPA had proposed to construct a new south-half interchange on the I-405, at Arbor Vitae Street, in the City of Inglewood. The new half interchange would have provided a new southbound onramp to I-405 from Arbor Vitae Street and a new northbound off-ramp from I-405 to Arbor Vitae Street. This would have created, from the I-405, a new direct vehicle access to and from the Hollywood Park Casino, the University of West Los Angeles, the Forum, and Centinela Hospital. If the build alternative is approved, construction is tentatively scheduled to begin in Spring 2013, and end in Spring 2015.

Figure 1-02. Vicinity Project Location



Map created by Tim Baker/Caltrans District 7 Division of External Affairs

Caltrans has two (2) project alternatives, one (1) of which is the half-interchange at Interstate 405/Arbor Vitae Street. The other alternative is the No-Build Alternative.

1.1.2 PROJECT HISTORY

The Interstate 405/Arbor Vitae Street Interchange Project was initiated by Los Angeles World Airports (Los Angeles Department of Airports at the time) in 1976 to provide an alternate East-West access route between I-405 and the Los Angeles International Airport. This project was part of a larger project proposed in 1980 and scheduled to be constructed in 1984. However, the Arbor Vitae Interchange has been postponed multiple times due to for the following reasons:

- right of way impact;
- opposition from local residents, who live adjacent to the proposed project, and the Inglewood Unified School District Board was prevalent during the public comment periods;
- Southern California Association of Governments (SCAG) did not support the construction of the full interchange, and led to the current south half version of the interchange. It lacks support from local elected officials.

At this time, this project is programmed through the Project Approval/Environmental Document [PA/ED] phase (the current phase). There is only partial funding currently programmed for the construction of this proposed alternative; an additional \$37 million is needed to construct this project. If approved, the project will be funded from the State Transportation Improvement Program (STIP) and the Regional Transportation Improvement Program (RTIP).

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Figure 1-03. Arbor Vitae Project Map



Map created by Khanh Nguyen/Caltrans District 7 Division of Project Development and Laura Vanaskie/Galvin Preservation Associates

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1.2 THE PROPOSED PROJECT: PURPOSE AND NEED

1.2.1 INTRODUCTION OF PURPOSE

Traffic studies have identified heavy congestion on the segment of the I-405 within, and adjacent to, the project limits. The project's purpose is to reduce congestion at the Century Boulevard and Manchester Avenue interchanges by creating along Arbor Vitae Street, from the I-405, a new direct vehicle access to and from the Hollywood Park Casino, the University of West Los Angeles, the Forum, and Centinela Hospital.

1.2.2 DISCUSSION OF PURPOSE

The project is intended to:

- Alleviate existing and future recurring congestion at two adjacent interchanges on Interstate 405 (Century Boulevard interchange and Manchester Avenue interchange).
- Provide direct vehicle access to the University of West Los Angeles located west of Interstate 405, and Hollywood Park Casino, the Forum, and Centinela Hospital, east of Interstate 405.

The proposed new south half interchange will relieve congestion at the existing adjacent interchanges located at Century Boulevard and Manchester Avenue. Without increasing I-405 mainline capacity, the project would have reduced some travel times on the collector-distributors and local streets, within and around the Project Study Area.

1.2.3 DISCUSSION OF NEED

The I-405 freeway is the only north-south freeway west of downtown Los Angeles. Therefore, the I-405 is the only freeway to connect the South Bay Region, the San Fernando Valley, and the Westside of Los Angeles. The mobility of these portions of Los Angeles County depend upon the I-405. In 2007, the I-405 freeway carried an average of 159,000 vehicles per day of northbound and southbound traffic in the vicinity of the Arbor Vitae Overpass. By 2035, this number is expected to increase to 196,000 vehicles per day. This project would not have increased the existing I-405 mainline capacity. However, the new south half interchange will relieve the congestion on the existing ramps at Century Boulevard and Manchester Avenue and may have resulted in a reduced number of accidents in the segment of I-405 within the project study limits (postmile 22.2/23.4) according to the Final Project Report.

The following discussion summarizes the present and future conditions of the existing I-405 project area between Century Boulevard and Arbor Vitae Street, which justifies the need for action. One project alternative has been identified to meet the purpose and need. If no improvements are made, the project area's section of I-405 will face increasing congestion and increased travel times on Century Boulevard and Manchester Avenue and their interchanges, and adjacent local streets.

Congestion (Improvements to Operation, Capacity, and Traffic Flow). Traffic studies indicate that heavy congestion exists during weekday morning, mid-day, and evening peak hours as well as on weekends on the stretch of Interstate 405 within and adjacent to the project limits. Weaving and merging of traffic on the freeway, collector-distributors, and ramps further aggravate the resulting stop-and-go traffic conditions. Motorists from Interstate 105 traveling to the northbound I-405 are unable to use the Interstate 405 northbound off-ramp to Century Boulevard to access LAX. This deficiency further compounds the congestion at the Manchester Avenue interchange.

In the I-405/Arbor Vitae Street Interchange Traffic Analysis completed by CH2M Hill, data analysis of existing traffic volumes, capacity, Level of Service (LOS) levels and existing and future SCAG demands was conducted to develop procedures for estimating future demands. The resulting mainline freeway growth rates between existing conditions and 2035 was 5.0 percent. The local street (intersection) growth rate was 15.6 percent.

Existing Access and Freeway Interchange Level of Service (LOS) in the Project Area.

For a more in-depth discussion of traffic data within the Project Study Area, please refer to Section 2.1.6, titled "Traffic and Transportation/Pedestrian and Bicycle Facilities."

1.2.4 SOCIAL DEMANDS AND ECONOMIC DEVELOPMENT

The project will improve economic vitality to the surrounding communities by providing direct vehicle access to the University of West Los Angeles (west of Interstate 405), Hollywood Park Casino, the Forum and Centinela Hospital (east of Interstate 405). Vehicle congestion will be reduced along Century Boulevard and Manchester Avenue and along their onramps and off-ramps as drivers utilize the Arbor Vitae New South Half Interchange's southbound off-ramp and northbound onramp. Safety along these corridors will be improved as well. Overall, the I-405/Arbor Vitae New South Half Interchange will improve mobility and accessibility to west Los Angeles County's primary north-south freeway and serve as a benefit to the surrounding communities and future land use goals.

The Project Within the Context of the Transportation System, Existing Land Use Planning, and Regional Growth. The City of Los Angeles Department of City Planning has developed the transportation element of the general plan in conjunction with the 35 communities that make up the city planning area. The goal of the transportation plan is to present a code for further development of a citywide transportation system which provides for the efficient movement of people and goods (City of Los Angeles 1997). It also recognizes that the primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure, in which the I-405/Arbor Vitae Street New South Half Interchange is completely consistent with.

Accommodation of future growth is also a high priority for the City of Los Angeles (growth projections are referenced in the Growth section of this document). While accommodating future residential growth is a high priority, it is just as important to ensure quality of life in vibrant and livable neighborhoods. Constructing the New South Half Interchange at I-405/Arbor Vitae Street is likely to assist in reducing congestion along Century Boulevard and Manchester Avenue, adjacent local streets, and neighborhoods: The project will aid in achieving city goals in improving circulation in the surrounding neighborhoods, creating safer, pedestrian-oriented environments, and accommodating new growth.

The City of Inglewood has developed a circulation element in its 2006 Update to its General Plan. The goal of the circulation element is to lay the groundwork for and promote the development of a coordinated, multi-modal citywide transportation system to meet the needs of all people living, working, or visiting the City and all economic segments of the community. The circulation element's purpose is to set forth strategies to support the production of a circulation system consistent with the overall vision specified for the City of Inglewood that includes; a well functioning transportation system in the City of Inglewood, which is vital.

Most Caltrans capacity-increasing projects are proposed as a response to traffic congestion that is a result of growth that has already occurred or will soon occur. The I-405/Arbor Vitae Street New South Half Interchange Project does not have the potential to adversely induce growth beyond current regional growth projections because of the highly urbanized setting in the project location and a predominantly built-out environment. For more detailed discussion of growth, please refer to Section 2.1.2 of this Environmental Assessment, entitled "Growth."

Projected Land Use Planning Changes in the Area. The Project Study Area is primarily a built-out environment with limited possibilities in land use zoning changes and little room for geometrical improvements at or near the proposed but rejected new south half interchange location. At great expense and inconvenience for residents, employees, business owners, and motorists, the Century Boulevard and Manchester Avenue interchanges and overpasses could be reconstructed and widened simultaneously with the widening of the Interstate 405 freeway. However, the new south half interchange construction has been determined to be a more feasible alternative. For a more in-depth discussion on land use

planning within the Project Study Area, please refer to Section 2.1.1 of this document titled “Land Use and Planning.”

1.2.5 IS THE PROPOSED PROJECT A COMPONENT OF A LARGER PROJECT?

The proposed but rejected LA405/Arbor Vitae Street New South Half Interchange Project will relieve congestion at the existing adjacent interchanges located at Century Boulevard and Manchester Avenue. Without increasing I-405 mainline capacity, the project will reduce some travel times on the collector-distributors and local streets, within and around the Project Study Area. This project is an independent project that is not related to any other Caltrans project. The project has a Purpose and Need that cannot be fulfilled by any other Caltrans project. In addition, the proposed project begins on Interstate 405 from the Century Boulevard interchange and ends at the Arbor Vitae Street Overpass. This Environmental Assessment analyzes the entire project area, and is, in no way dependent on the environmental document or mitigation proposals of any other project. Lastly, the proposed project will not 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.

Other Caltrans Improvement Projects on Interstate 405

EA 1178U1 | Southbound & Northbound Interstate 405 Carpool Lane

Mile Marker: 25.9/29.5

Construct carpool lane from Route 90 to Interstate 10

Construction completed

EA 120300 | Northbound Interstate 405 Carpool Lane

Mile Marker: 28.8/39.0

Construct carpool lane from National Boulevard to Greenleaf Street

Construction: 4/2009-4/2013

EA 1667U4 | Southbound Interstate 405 Carpool Lane

Mile Marker: 31.9/39.7

Construct southbound carpool lane

Construction completed

EA 191004 | Northbound Interstate 405 Auxiliary Lane

Mile Marker: 37.0/39.0

Add auxiliary lane from Mulholland Drive

Construction completed

EA 191304 | Northbound Interstate 405 to Southbound US Route 101 Widening

Mile Marker: 39.0/39.4

Widen northbound I-405 to southbound US-101 connector

Construction completed

EA 195903 | Southbound Interstate 405 Carpool Lane

Mile Marker: 29.8/32.1

From I-10/I-405 Interchange to Waterford Street

Add auxiliary lane, add carpool lane

Construction completed

EA 199611 | Southbound Interstate 405 to US-101 Connector Improvement Project

Mile Marker: I-405: 39.4/40.5, US-101: 17.0/19.4

From southbound I-405 to North and southbound US-101 Freeway

New two-lane 50 miles per hour connector and bridge structure over Sepulveda Dam

Construction: 12/2013-1/2017

EA 199624 | Northbound Interstate 405 Carpool Lane

Mile Marker: 38.8/40.1

Construct carpool lane from Greenleaf to Burbank Boulevard

Construction completed

EA 201203 | Northbound Interstate 405 Gap Closure

Mile Marker: 38.7/39.4

Carpool gap closure with structure

Construction completed

1.3 THE PROPOSED PROJECT: PROJECT DESCRIPTION

The California Department of Transportation (“Caltrans”) proposed to construct a new south-half interchange on the I-405, at Arbor Vitae Street, in the City of Inglewood. The new half interchange would have provided a new southbound onramp to the I-405 from Arbor Vitae Street, as well as, a new northbound off-ramp from the I-405 to Arbor Vitae Street. This would create, from the I-405, a new direct vehicle access to and from the Hollywood Park Casino, the University of West Los Angeles, the Forum, and Centinela Hospital.

1.3.1 CURRENT TWO (2) ALTERNATIVES THAT REMAIN UNDER CONSIDERATION

The project includes two viable alternatives:

ALTERNATIVE 1

Alternative 1 (No-Build Alternative)

This Alternative would lead to no changes to Arbor Vitae Street or its Overpass. No changes would be constructed on the State Highway System or any local roads. Caltrans has identified the No Build Alternative (Alternative 1) as the Preferred Alternative. The following factors led Caltrans to that decision:

1. Though the Build Alternative (Alternative 2) achieves the Purpose and Need, a new traffic analysis by Caltrans consultant CH2MHill has demonstrated that Alternative 2 would produce a substantial increase in afternoon traffic delays at various locations, thereby worsening the Total Network Average Intersection Delay in the year 2035. Please refer to the following table, as well as, Sections 2.1.6 for additional details.
2. FHWA declined to grant the half-interchange design exception that is required for Alternative 2 Without that design exception, Alternative 2 cannot be constructed.
3. Strong local support based on spoken and written comments during the Public Participation Process for the No Build Alternative.

As can be seen in the following table, Alternative 2 would produce a substantial increase in afternoon traffic delays at the intersections of Arbor Vitae Street/Aviation Boulevard (81.9 seconds or “LOS D to LOS F”), Arbor Vitae Street/La Cienega Boulevard (116.1 seconds or “LOS C to LOS F”), Arbor Vitae Street/Oak Street (78 seconds or “LOS F to a worse LOS F condition”), and Arbor Vitae Street/Inglewood Avenue (78.2 seconds or “LOS C to LOS F”). The scale for the Level of Service (LOS) for signalized intersections can be viewed in Table 12, on page 42.

Table 1. Year 2035 Traffic Analysis Delay and Level of Service (LOS)

Year 2035 Traffic Analysis

Intersection	Increased AM Delay (seconds) if Alternative 2 selected	Increased PM Delay (seconds) if Alternative 2 selected	Alternative 1 (No Build)				Alternative 2 (New Arbor Vitae Half IC)			
			AM		PM		AM		PM	
			Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS	Delay (sec)	LOS
Arbor Vitae St at Aviation Blvd	50.1	81.9	40.5	D	50.1	D	90.6	F	132.0	F
Arbor Vitae St at La Cienega Blvd	41.6	116.1	14.8	B	30.1	C	56.4	E	146.2	F
Arbor Vitae St at Oak Street	10.3	78	25.3	C	82.8	F	35.6	D	160.8	F
Arbor Vitae St at Ingleswood Ave	8.6	78.2	36.0	D	31.4	C	44.6	D	109.6	F
Arbor Vitae at La Brea Ave	6.8	33.5	43.5	D	66.5	E	50.3	D	100.0	F
La Tijera Blvd at Sepulveda Blvd	-0.3	5	38.1	D	100.6	F	37.8	D	105.6	F
Arbor Vitae Street at Sepulveda Blvd	3.8	-7.3	47.1	D	103.8	F	50.9	D	96.5	F
Arbor Vitae Street at Airport Blvd	4.7	28.1	25.6	C	25.4	C	30.3	C	53.5	D
La Cienega Blvd at Olive St	1.6	2.6	22.4	C	24.9	C	24.0	C	27.5	C
Manchester Ave at Ingleswood Ave	0.9	-0.6	11.8	B	15.0	B	12.7	B	14.4	B
Century Blvd at Ingleswood Ave	-3.1	2.3	42.3	D	28.4	C	39.2	D	30.7	C
Manchester Ave at La Brea Ave	-6.1	0.5	118.8	F	60.0	E	112.7	F	60.5	E
Arbor Vitae St at Prairie Ave	1.4	5.7	6.9	A	16.6	B	8.3	A	22.3	C

Note: (-) means a projected improvement, not an increase in delay

ALTERNATIVE 2:

Alternative 2, the proposed engineering features included the following:

1. Arbor Vitae Street Overcrossing would be widened an additional 6 feet on each side to accommodate traffic due to the proposed interchange. The bridge structure would be widened from 78 feet to 90 feet.
2. A new southbound onramp from Arbor Vitae Street will be constructed with the connection to Arbor Vitae Street located on the east side of the freeway and connecting to the south side of Arbor Vitae Street. A portion of this ramp will be located on an overcrossing structure that spans over both directions of I-405 before connecting to southbound I-405.
3. A new northbound off-ramp to Arbor Vitae Street will be constructed with the connection to Arbor Vitae Street located on the east side of the freeway and connecting to the south side of Arbor Vitae Street. The new southbound onramp and northbound off-ramp connect to Arbor Vitae Street at a single intersection location.
4. A new cul-de-sac will be constructed on Ash Avenue south of Arbor Vitae Street.
5. New sound walls will be constructed along northbound and southbound I-405 at various locations.
6. Various retaining walls will be constructed to accommodate the proposed ramps.
7. The Century Boulevard collector structure (Century Collector OC) will be replaced to accommodate the proposed northbound off-ramp to Arbor Vitae Street.

1.3.2 PREVIOUSLY CONSIDERED BUT REJECTED ALTERNATIVES

ALTERNATIVE 3 (SOUTHERN INTERCHANGE)

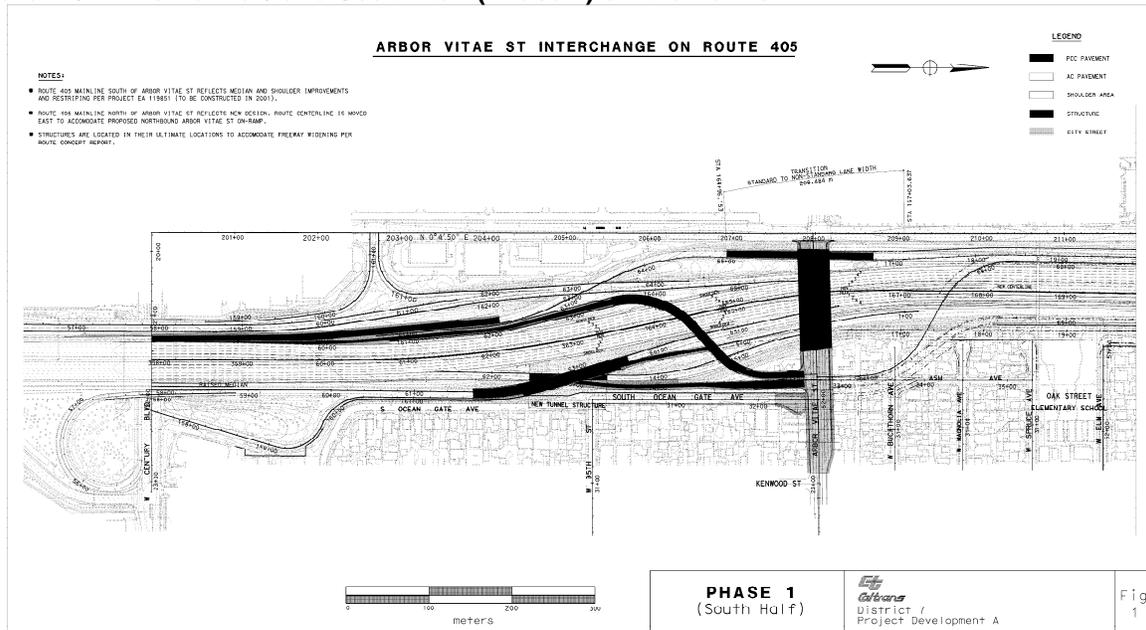
Similar to the Current Alternative 2, Rejected Alternative 3 would create the south half of the I-405/Arbor Vitae Street New South Half Interchange instead of a full interchange as originally proposed for this project. However, as shown in Figure 1-04 on the following page, this version of the new south half interchange design would have taken 14 full takings and 4 partial takings due to the construction of a new Arbor Vitae Street Overcrossing. This alternative would have the following design features:

- Construct a single lane off-ramp to Arbor Vitae Street from the northbound Interstate 405 off-ramp to the Manchester Avenue collector. The ramp width will widen to two lanes at the ramp terminus to provide for mandatory left and right turn pockets plus storage space for vehicles to line up in. This would provide more direct access from northbound I-405 to Arbor Vitae Street.

- Build a two-lane onramp to SB I-405 from Arbor Vitae Street. The two off-ramp lanes would merge into one lane and then merge into the SB I-405 mainline. Arbor Vitae Street would be widened to the south from east of the Arbor Vitae Street overcrossing structure to Kenwood Street to accommodate a right turn pocket for eastbound Arbor Vitae Street movements to southbound I-405 and a left turn pocket for westbound Arbor Vitae Street movements to southbound I-405.
- Reconstruct the northbound Century Boulevard collector elevated overcrossing to provide a wider opening to accommodate the new northbound off-ramp to Arbor Vitae Street. This will require constructing a temporary overcrossing structure in order to continue to provide access from Century Boulevard to northbound I-405.
- The at-grade intersection between Ash Avenue and Arbor Vitae Street would be removed. Ash Avenue would end in a cul-de-sac south of Arbor Vitae Street.
- A retaining wall would be constructed west of Ash Avenue to accommodate the new northbound off-ramp to Arbor Vitae Street.
- Retaining walls would be constructed east of the southbound Interstate 405 onramp from La Cienega Boulevard/Olive Street intersection and along the southbound I-405 mainline to accommodate the new southbound onramp from Arbor Vitae Street.
- A new Arbor Vitae Street Overcrossing would be constructed.

This previously rejected alternative would have better accommodated a future full interchange at Arbor Vitae Street. Unfortunately, Alternative 3 would require the acquisition of fourteen (14) full and four (4) partial property acquisitions to build the south half of the Arbor Vitae Street Interchange. It has been redesigned into the current Build Alternative 2 that has only seven full property acquisitions as the Manchester Avenue Tunnel will remain as is.

Figure 1-04. Alternative 3 and South Half (Phase 1) of Alternative 4



ALTERNATIVE 4 (FULL INTERCHANGE)

Rejected Alternative 4 consists of constructing a full interchange to provide direct access to and from the I-405 Freeway and relieve congestion on the two adjacent interchanges at Manchester Avenue and Century Boulevard. The full interchange would allow traffic to travel on an additional roadway from the Century (I-105) Freeway to Los Angeles World Airport and the adjacent neighborhoods and commercial and public facilities on or near Arbor Vitae Street.

This alternative, as shown in Figure 1-04 and Figure 1-05 on the following page, will require constructing both elevated northbound and southbound off and onramps at Arbor Vitae Street, on the east side of freeway, at a single intersection location. This version of the full interchange design would provide direct access from westbound Interstate 105 to Arbor Vitae Street with the following design features:

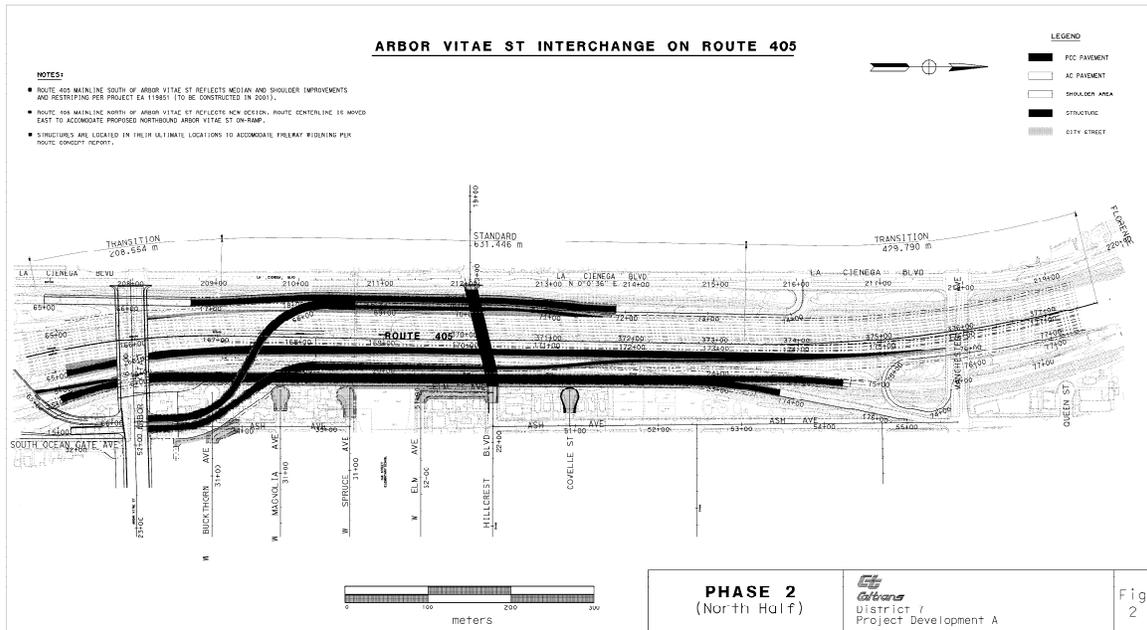
1. Arbor Vitae Street Overcrossing will have to be replaced by a structure that is at least 108 feet wide to allow all of the necessary traffic movements.
2. The La Cienega Boulevard/Manchester Avenue off-ramps will have to be realigned and a retaining wall will need to be constructed at the Oak Street Elementary School.
3. Realign the Manchester Avenue southbound onramp between the ramp inlet from La Cienega Boulevard and Arbor Street.
4. Construct a retaining wall between La Cienega Boulevard and the realigned Manchester Avenue southbound onramp from Hillcrest Boulevard to Arbor Vitae Street.
5. Demolish the Spruce Avenue pedestrian and waterline overcrossing structure.
6. Demolish and reconstruct the Hillcrest Boulevard structure to provide utility openings for relocating the waterline and replacing the Spruce Avenue pedestrian overcrossing. Also, extend the sidewalk to Spruce Avenue on the southeast side of the structure.
7. Reconstruct the tunnel at the northbound off-ramp to Manchester Avenue or construct a bridge by removing the tunnel (south of Arbor Vitae Street) and realign the existing onramp to Manchester Avenue to construct the northbound off-ramp to Arbor Vitae Street.
8. A total of fifty-three (53) properties would need to be acquired for the full interchange construction.

This alternative has been withdrawn from consideration due to the number of impacts associated with the northern portion of the interchange including:

- 1) Section 4(f) impacts to the Oak Street Elementary School. High number of residential relocations due to necessary right-of-way takings

In addition, there was widespread and intense community opposition to this alternative of the project. At the time this alternative was proposed, there was a lack of available funding for a full interchange project.

Figure 1-05. North Half (Phase 2) of Alternative 4



ALTERNATIVE 5 (MODIFIED SOUTHERN INTERCHANGE)

Rejected Alternative 5 is similar to Rejected Alternative 3 as a South Half Interchange. This alternative has a viaduct along the median of Interstate 405 and a northbound loop off-ramp instead of the northbound off-ramp to Arbor Vitae Street. The loop off-ramp requires additional right of way, but relinquishes the need to modify or reconstruct the Manchester Avenue Tunnel.

This rejected alternative would not sufficiently meet the project's purpose and need to reduce congestion along Century Boulevard and Manchester Avenue. This alternative requires additional right-of-way than the proposed build alternative and would not alleviate existing and projected traffic congestion along Century Boulevard and Manchester Avenue. The distance between the southbound off-ramp intersection (La Cienega Boulevard and Arbor Vitae Street) would be approximately 221 feet, which does not meet the minimum mandatory standard of 394 feet. Alternative 4 is inefficiently configured to service the projected traffic volumes along Interstate 405 and Century Boulevard and Manchester Avenue. Also, the multiple ramp access points of Alternative 4 would adversely disrupt traffic flows along Arbor Vitae Street.

ALTERNATIVE 6 (MODIFIED FULL INTERCHANGE)

Rejected Alternative 6 is similar to Rejected Alternative 4 except that the southbound off-ramp will not be constructed. Instead, the southbound Century Boulevard off-ramp would be widened and utilized for this full interchange alternative.

This alternative would not sufficiently meet the project's purpose and need to reduce congestion along Century Boulevard and Manchester Avenue. This alternative requires additional right-of-way and would not alleviate existing and projected traffic congestion on Century Boulevard and Manchester Avenue. This alternative is inefficiently configured to service the projected traffic volumes. Rejected Alternative 6's absence of a southbound off-ramp access, in addition to the other three inefficient ramp configurations, would both adversely disrupt traffic flow on Arbor Vitae Street and not provide full access to the project area.

1.4 TSM, TDM AND MASS TRANSIT

It is not anticipated that the proposed project will interfere with any transit operator planning in the area. However, Transportation System Management (TSM) and Transportation Demand Management (TDM) alternatives are usually only relevant in urban areas with population over 200,000 such as Los Angeles County. Also, in urban areas with population over 200,000 including Los Angeles County, a Mass Transportation Alternative is considered on all proposed major highway projects such as the I-405/Arbor Vitae Street New South Half Interchange.

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. TSM also encourages automobile, public and private transit, ridesharing programs, and bicycle and pedestrian improvements as elements of a unified urban transportation system.

Modal alternatives integrate multiple forms of transportation modes, such as pedestrian, bicycle, automobile, rail, and transit.

TDM focuses on regional strategies for reducing the number of vehicle trips and vehicle miles traveled as well as increasing vehicle occupancy. It facilitates higher vehicle occupancy or reduces traffic congestion by expanding the traveler's transportation choice in terms of travel method, travel time, travel route, travel costs, and the quality and convenience of the travel experience. Typical activity within this component is providing contract funds to regional agencies that are actively promoting ridesharing, maintaining rideshare databases and providing limited rideshare services to employers and individuals.

For the congested Interstate 405 mainline and the Century Boulevard and Manchester Avenue interchanges, TSM, TDM, and modal alternatives (including rail and transit) may seem like reasonable and attractive strategies/alternatives. However, such strategies are outside the scope of this particular project for the following reasons:

- 1) Those strategies do not meet the proposed project's Purpose and Need. In particular, they would not effectively alleviate existing and future recurring congestion at two adjacent Century Boulevard and Manchester Avenue interchanges on Interstate 405. Nor would these strategies provide direct vehicle access to the University of West Los Angeles west of Interstate 405 and to Hollywood Park Casino, the Forum and Centinela Hospital east of Interstate 405.
- 2) The proposed project's size (on Interstate 405 between Century Boulevard and Arbor Vitae Street) and focus is too small and narrow for any meaningful implementation and integration of TSM, TDM, and modal alternatives.
- 3) TSM, TDM, and modal alternatives would best serve as stand alone projects to be implemented not only within this project's study area, but along the entire Interstate 405, Century Boulevard, and Manchester Avenue corridors.

1.5 PERMITS AND APPROVALS NEEDED

No permits and approvals would be required.

Approvals

There will be no encroachment upon any State or Federal parklands or environmentally sensitive areas (ESAs) since none exist within the I-405/Arbor Vitae Street New South Half Interchange Project Study Area. Therefore, the Army Corps of Engineers will not have to grant an easement to Caltrans before construction begins on this project to ensure that the project complies with Federal statutes and regulations governing Army Corps Civil Works projects and real estate activities.

Permitting Requirements

There are no surface waters or State or Federal listed species within the project's footprint. Therefore, the following will not be required:

- Fish and Game Code 1602 Streambed Alteration Agreement
- Clean Water Act Section 401 Water Quality Certification
- Clean Water Act Section 404 Nationwide Permit
- FESA Consultation with the U.S. Fish and Wildlife Service
- CESA Consultation with the California Department of Fish and Game

CHAPTER 2 | AFFECTED ENVIRONMENT, POTENTIAL IMPACTS AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

2.1 HUMAN ENVIRONMENT

This chapter presents potential impacts to human environments which may have been caused by the proposed Arbor Vitae New South Half Interchange Project. In this case, human environments are identified as the Inglewood, Westchester, and Lennox communities. There is no indication that these communities would be substantially impacted by the Arbor Vitae Project. The majority of the project's activities will be conducted exclusively within Inglewood city limits, and the Westchester and Lennox communities should see minimal impacts. As a result, the Inglewood community is a major focus of this human environment assessment.

Our assessment includes the following sections, which are subdivided into Regulatory Setting, Affected Environment, Potential Impacts, and Avoidance, Minimization, and/or Mitigation Measures:

1. Consistency with State, Regional, and Local Programs
2. Land-Use and Planning
3. Growth
4. Community Impacts
5. Utilities/Emergency Services
6. Traffic and Transportation/Pedestrian and Bicycle Facilities
7. Visual/Aesthetics
8. Cultural Resources

2.1.1 CONSISTENCY WITH STATE, REGIONAL, AND LOCAL PROGRAMS

Coastal Zone, Wild and Scenic Rivers, and Farmlands/Timberlands

Preliminary analysis shows that the proposed project does not fall within the State of California's Coastal Zone; there are no Wild and Scenic rivers and no Farmlands/Timberlands in the Project Study Area. Therefore, the project will have no adverse impacts on these resources. Consequently, there is no further discussion regarding Coastal Zone, Wild and Scenic Rivers, or Farmlands/Timberlands resources in this document.

Park and Recreational Facilities

No Parks and Recreational Facilities, Waterfowl Refugees, or Section 4(f) resources are located within the Project Study Area, nor would they have been taken or used as a result of the construction of Alternative 2 (New South Half Interchange).

No Section 4(f) evaluation was necessary to prepare pursuant to the FHWA regulations for Section 4(f) compliance codified at 23 CFR Section 774. Additional guidance regarding the existence of no Section 4(f) resources in the Project Study Area has been obtained from the FHWA Technical Advisory T 6640.8A (1987), the FHWA Section 4(f) Policy Paper (2005), and the FHWA Western Resource Center Section 4(f) Checklist (1997).

2.1.2 LAND USE AND PLANNING

Existing and Future Land Use

The existing and future land use within the Arbor Vitae Corridor can be described by land use types, commuter patterns, and economic development plans. This information can be found in the following discussion.

Westchester-Playa Del Rey Community Plan/Los Angeles County General Plan

As noted in the Westchester-Playa Del Rey Community Plan, the land uses in the Arbor Vitae Street corridor can be classified as residential single and multi-family housing, commercial (office/retail), and industrial (manufacturing and airport-related). In addition, the portions of the project which fall within Lennox and Westchester are residential and public land (Westchester).

The Ground Transportation Center in the LAX Master Plan and was mentioned by Councilman Bill Rosendahl's Field Representative Jim Kennedy at an Elected Officials Briefing for the I-405/Arbor Vitae New South Half Interchange Project. At this time, there is no development timeline or funding for the Manchester Square Redevelopment Project since it was removed from the LAX Plan via the 2004 Stipulated Settlement.

City of Los Angeles General Plan/LAX Plan

The particular area of the community of Westchester just east of LAX, but west of Interstate 405 is generally referred to as the Airport Landside area, as identified in the City of Los Angeles General Plan and the LAX Plan. The area serves as the interface between Airport Airside and the regional ground transportation network, establishing access portals for the efficient processing of people and goods. It includes only the following facilities: Central Terminal Area (CTA), Ground Transportation Center (GTC), Intermodal Transportation Center (ITC), and Consolidated Rental Car Facility (RAC). The Arbor Vitae New South Half Interchange Project is consistent with the LAX Plan's objectives regarding community cohesion, economic development and improving traffic circulation on local roads. It also addresses the problem of "pass-through" traffic on I-405 noted in the Westchester-Playa Del Rey Community Plan by reducing vehicle hours traveled on this highway. The Westchester-Playa Del Rey Community Plan includes the widening of Arbor Vitae Street from four to six lanes between Airport and Aviation Boulevards. The Arbor Vitae Street Overcrossing would be widened to accommodate the future widening of the roadway with the construction of the Arbor Vitae New South Half Interchange Project.

LAX Master Plan

The current revision of the LAX Master Plan includes several substantial improvements to roadway facilities aimed at redistributing traffic to and from LAX throughout the Project Study Area, including improvements to Arbor Vitae Street. Century Boulevard is the principle roadway to LAX, but urgent congestion relief is needed as commuters continue to seek alternative routes, creating gridlock on the surrounding arterial system. While these improvements are not necessarily dependent on the construction of a new south half interchange on I-405 at Arbor Vitae Street, the proposed project would have aided in accomplishing the future goals of LAX's parent company, Los Angeles World Airports (LAWA), in improving traffic circulation in and around airport facilities. Specifically, the proposed project aims at reducing congestion at the I-405 on- and -off-ramps at Manchester Avenue and Century Boulevard, and would provide an additional point of access to and from LAX to the I-405 mainline.

Inglewood General Plan/Inglewood Citywide Economic Development Strategic Plan

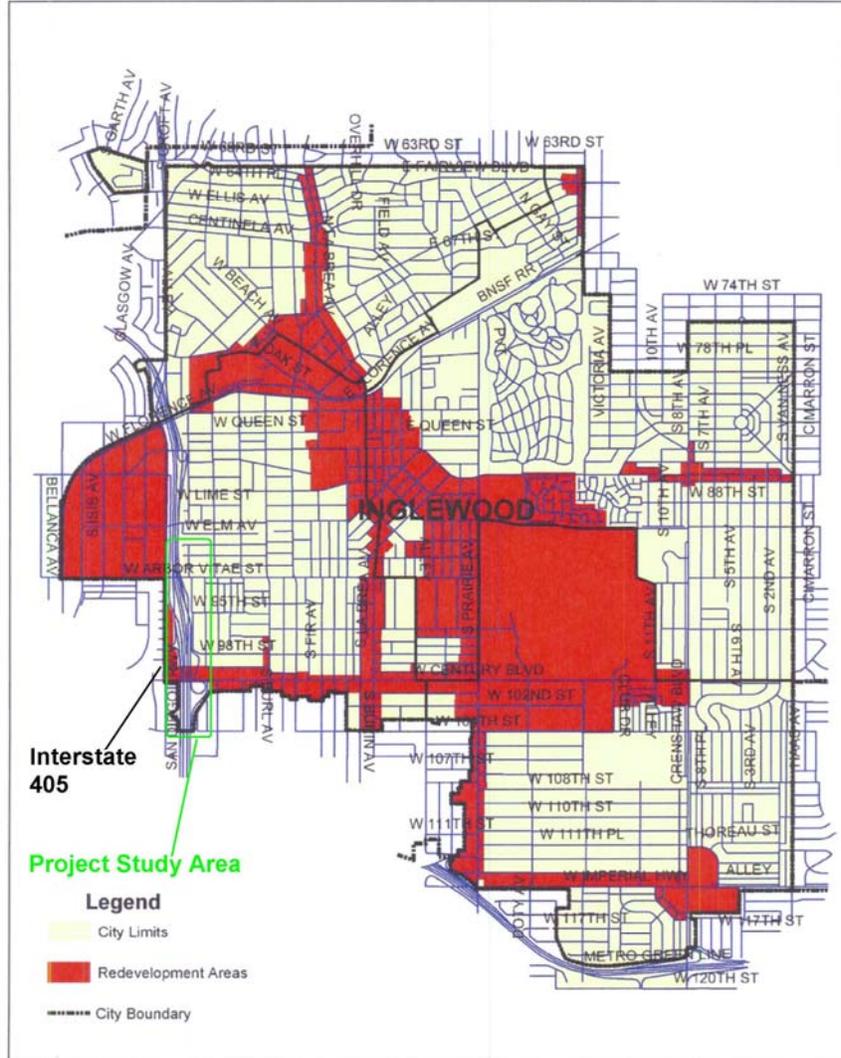
The portions of the project that fall within the City of Inglewood are primarily commercial and residential as noted in the Inglewood General Plan. Major venues at the east end of the Arbor Vitae Corridor include Centinela Hospital Medical Center at Myrtle Avenue and Hollywood Park Casino at Prairie Avenue/Avenue of the Champions. The 2005 Citywide Economic Development Strategic Plan for the City of Inglewood, details the economic needs of the city, as well as defines areas to be redeveloped. The City of Inglewood has various economic needs including workforce development, new retail businesses to generate additional sales tax revenues, and the creation of small businesses. Based on these economic needs and the Citywide Economic Development Strategic Plan, the Arbor Vitae New South Half Interchange Project should be a complimentary development project with the city's economic objectives. In fact, the Arbor Vitae New South Half

Interchange Project is outlined as a portion of the city's defined redevelopment areas. See Figures 2-01 and Figure 2-02 on the following two pages that illustrate the redevelopment areas and the economic development target areas of Inglewood.

The Mixed Use Redevelopment of the Hollywood Park Casino Complex at 1050 South Prairie Avenue in Inglewood, California (Zip Code 90301) was approved on June 9, 2009 by the Inglewood City Council. Construction of the project will begin in the fall of 2010 and be completed by 2014. This project helps the City of Inglewood reach its economic objectives. The Hollywood Park Redevelopment Project's cumulative impacts will be present prior to and during the construction of the I-405/Arbor Vitae New South Half Interchange.

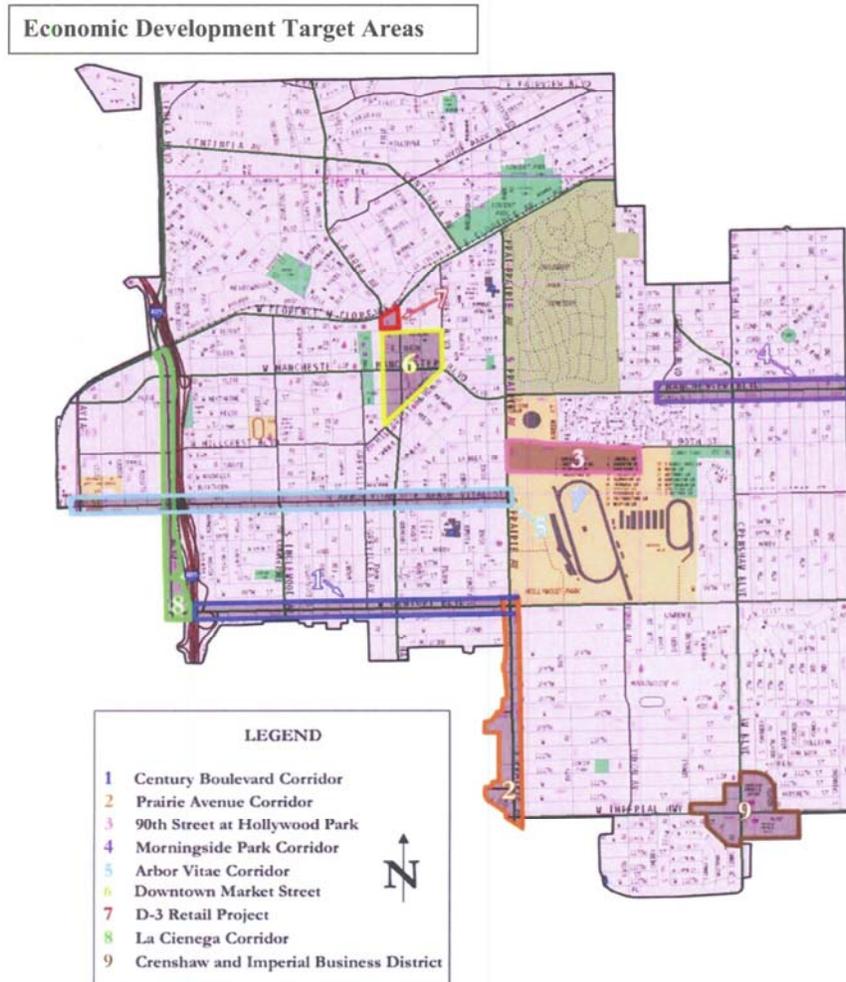
The map on the following page defines the redevelopment areas of City of Inglewood.

Figure 2-01. Redevelopment Areas of Inglewood



This map defines the City of Inglewood's economic development target areas including the Arbor Vitae Corridor.

Figure 2-02. Economic Development Target Areas



Commuter Patterns

In regards to commuter patterns, there are two primary areas of concern, capacity and congestion. In 2007, approximately 159,000 vehicles travel along I-405 in the vicinity of the Arbor Vitae overpass per day. By 2035, this number is expected to increase to 196,000 vehicles per day. Traffic studies indicate that heavy congestion exists during weekday morning, midday, and evening peak hours as well as on weekends on the stretch of I-405 within and adjacent to the project limits. Weaving and merging of traffic on the freeway, collector-distributors, and ramps further aggravate the resulting stop-and-go traffic conditions. Motorists from I-105 traveling to the northbound I-405 are unable to use the I-405 northbound off-ramp to Century Boulevard to access LAX without having to make two difficult lane changes to the far right lane within a quarter of a mile amidst heavy congestion. This deficiency further compounds the congestion at the Manchester Avenue Interchange. In the Traffic Analysis completed by CH2M Hill, data analysis of existing volumes and existing and future SCAG demands was conducted to develop procedures for estimating future demands. The resulting mainline freeway growth rates between existing conditions and 2035 was 5.0 percent.

Consistency with State, Regional, and Local Plans and Programs

At this time, the project is programmed to be funded from the State Transportation Improvement Program (STIP) and the Regional Transportation Improvement Program (RTIP) for the 2008/2009 and 2009/2010 fiscal years. It is listed in both the 2008 Regional Transportation Plan (RTP) and the 2008 Regional Transportation Improvement Program (RTIP) is prepared by the Southern California Association of Governments (SCAG). Both of these documents are regional plans for future improvements for the area's transportation system. The project will be deprogrammed and not appear in the STIP nor the RTIP for the 2010/2011 fiscal year. A new project with local road improvements to Arbor Vitae Street and Century Boulevard and Manchester Avenue will be suggested to the City of Inglewood and City of Los Angeles.

Potential Impacts

The potential impacts to land use as a result of this project are minimal on a regional scale. Seven residential properties would have been acquired by Alternative 2 consisting of a half interchange at Arbor Vitae Street along I-405. Two of these residential properties also include commercial uses that include a law office. One of the properties, consisting of three residential units and a bakery, was damaged heavily in a fire and is now unoccupied. It will provide direct access to the University of West Los Angeles west of I-405 and to Hollywood Park Casino east of I-405.

Avoidance, Minimization and Mitigation Measures

The Arbor Vitae New South Half Interchange Project was proposed as an alternative to the Arbor Vitae Street Full Interchange Project that would avoid and minimize many of the acquisitions that would result from the original project. School and parkland would no longer be impacted by the new south half interchange. The number of property acquisitions has been reduced from 53 for the original design of the full interchange project to seven (seven residential units, 1 commercial office) for the current design of the New South Half Interchange.

Caltrans will allocate project funds for relocations and mitigate all associated costs and compensation needed per the relocation costs for a residence or office of their choice. The Relocation Assistance Program (RAP) assists residents and businesses in the relocation process and the Last Resort Housing Program payments will be utilized to relocate residents being displaced by this project. All displacees, as stated in the Relocation Impact Statement, will be contacted by a Right of Way Agent who will ensure that eligible displacees receive their full relocation benefits. For this project, all relocations should take place within an estimated time frame of 18 to 24 months.

Figure 2-03. Generalized Land Use in Inglewood

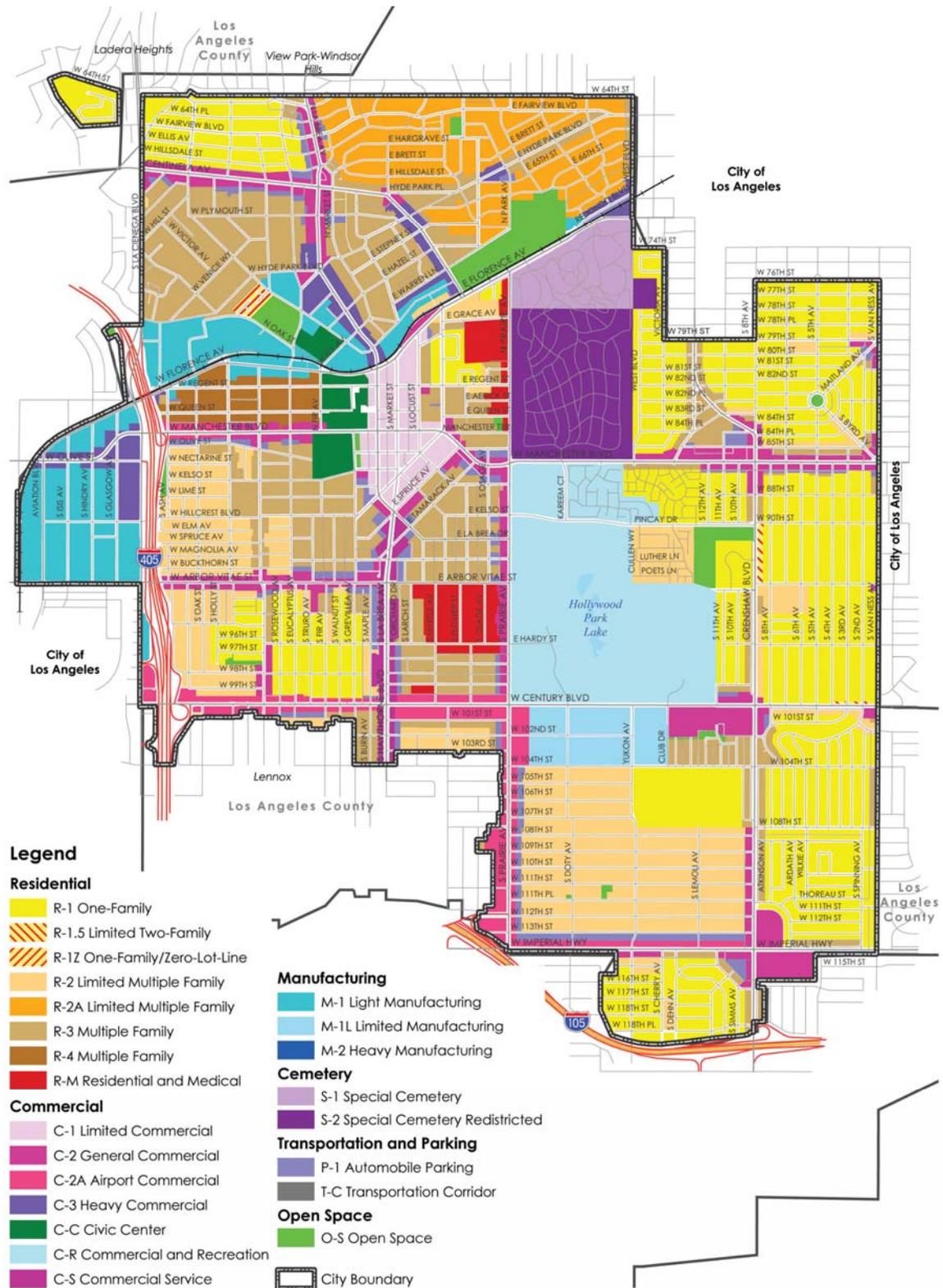
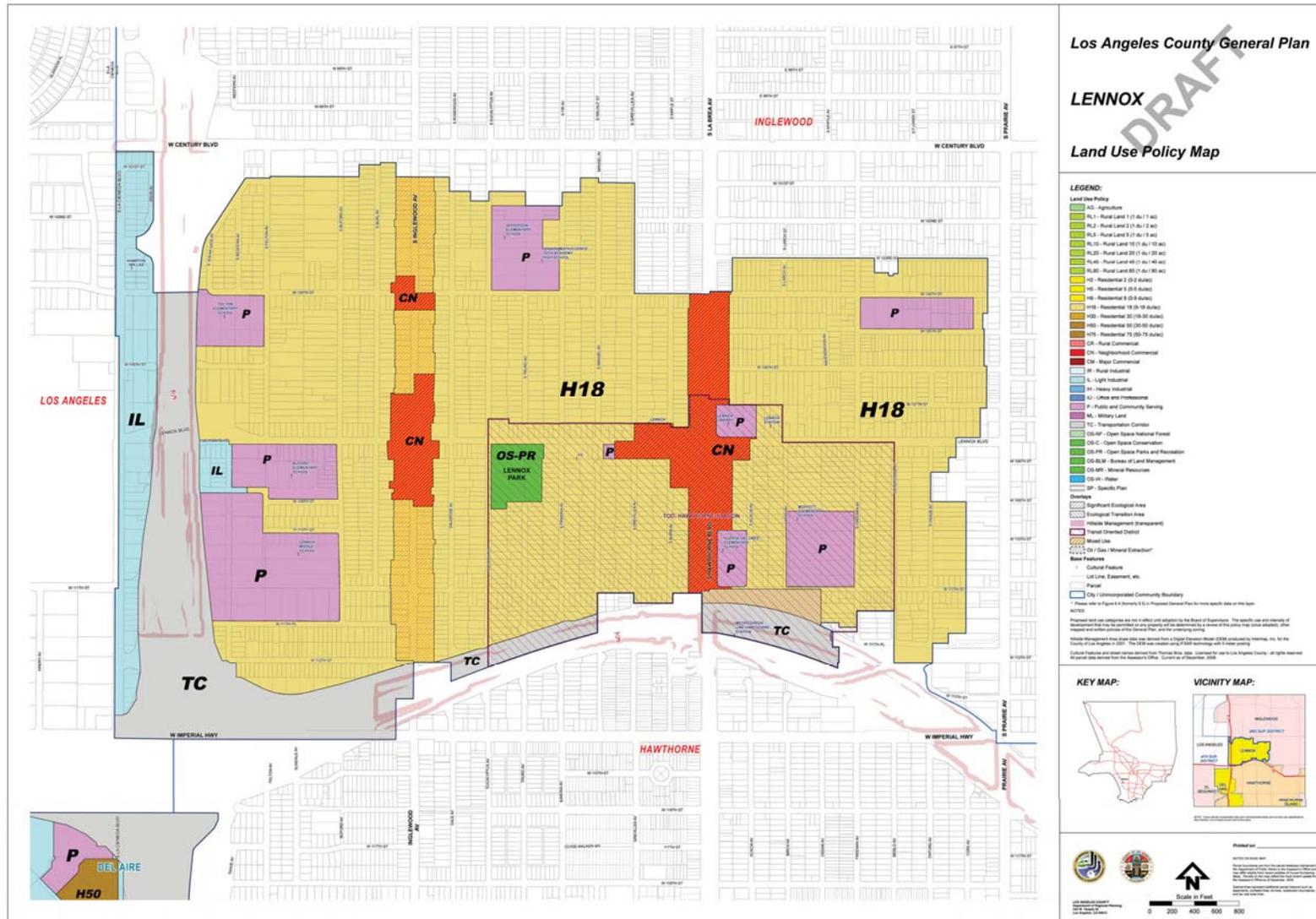


Figure 2-04. Generalized Land Use in Westchester-Playa Del Rey



Land Uses of Westchester-Playa Del Rey	
Residential	Category
[Yellow]	Low
[Light Orange]	Low Medium
[Medium Orange]	Low Medium II
[Dark Orange]	Medium
[Brown]	High Medium
Commercial	
[Light Pink]	Neighborhood
[Pink]	General
[Red]	Community
[Dark Red]	Regional
[Light Red]	Regional Mixed Use
Industrial	
[Light Blue]	Limited
[Blue]	Light
Open Space, Public Facilities	
[Green]	Open Space
[Dark Green]	Public/Quasi Public

Figure 2-05. Generalized Land Use in Lennox



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2.1.3 GROWTH

Regulatory Setting. The Council on Environmental Quality (CEQ) regulations, which implement the National Environmental Policy Act of 1969, requires evaluation of the potential impacts 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 CFR 1508.8, refer to these consequences as secondary impacts. Secondary impacts may include changes in land use, economic vitality, and population density, which are all elements of growth.

Affected Environment

The Project Study Area is in an urban, built out environment. The project area and the adjacent communities are dense in terms of population and commerce. As noted in the public comments received from the public circulation in 2000 of the Arbor Vitae Interchange Project Environmental Assessment/Initial Study approved in 2001, congestion from growth, particularly growth from the expansion of the Los Angeles International Airport (LAX) and its supporting businesses, is a concern to residents and workers. A number of past opponents of the project suspect that the purpose of the Arbor Vitae Interchange is to serve as an access point to Los Angeles International Airport and support its expansion. According to past and the current Environmental Assessment/Initial Studies of this interchange project, the project has not and will not include in its purpose to aid in the expansion of the airport's facilities. The LAX Plan and the Westchester-Playa Del Rey Community Plan note that many other projects and alternatives are in the works aimed at improving circulation in the Project Study Area, which include the development of connections between Airport Landside facilities and the regional ground transportation network, such as improvements to public transit systems.

As part of the scoping and environmental analysis conducted for the proposed project, the following growth elements were considered:

1) Land Use

In 2006, the City of Inglewood updated their General Plan (an ongoing process), which showed that single-family units contribute 45.6% of total land use, and multi-family units contribute 9.9% of the total land use in Inglewood. Comparably, the number of single family and multi family units affected by the Arbor Vitae extension should be minimal. In fact, a total of seven residences, including three multi-units and four single-family units will be affected by this project.

2) Economic Vitality

According to the City of Inglewood's General Plan, Century Boulevard and Manchester Avenue are major arteries that support more than 30,000 vehicles per day. Traffic studies conducted by Caltrans in 2008 reveal that Level of Service, or "LOS" (measurements of density, delay, and travel time) at on- and off ramp segments of Manchester Avenue and Century Boulevard are expected to deteriorate even more by 2035 (See "Traffic, Transportation / Pedestrian and Bicycle Facilities" section). These major arteries currently carry consumers to Hollywood Park Casino, The Forum, Centinela Hospital, and LAX, which are key locations for economic stimulus; hence, they are important access pathways to retail locations. Adding an on-and off ramp at Arbor Vitae Street, between Century Boulevard and Manchester Avenue would reduce congestion along the two major arteries that to these points while accommodating the existing growth that is/will be there whether the project is constructed or not, not to create more growth.

3) Population

In consideration of Inglewood's economic goals and overall growth, the Arbor Vitae half interchange has been developed to displace a minimal amount of residents. When the project is completed, a total of 21 residents will be displaced. As of 2005, the total population

of Inglewood was estimated at 118,164 and was growing at an annual rate of 0.97%. We do not anticipate a substantial impact on Inglewood’s current population growth.

Regional Growth Projections. The Southern California Association of Governments (SCAG) region encompasses Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. Los Angeles County consists of eight subregions; the Arroyo Verdugo Cities Subregion, Gateway Cities Council of Governments Subregion, Las Virgenes Malibu Council of Governments (LVMCOG) Subregion, City of Los Angeles Subregion, North Los Angeles County Subregion, San Gabriel Valley Council of Governments (SGVCOG) Subregion, South Bay Cities Council of Governments Subregion, and the Westside Cities Subregion. The communities surrounding the project area include Inglewood, which falls within the South Bay Cities Council of Governments Subregion, and Westchester, which falls within the City of Los Angeles Subregion, which has the largest population and most households in the region.

Based on the SCAG 2008 RTP Socioeconomic Forecast, the City of Los Angeles Subregion is expected to grow at a slower pace than other subregions in Los Angeles County, its population increasing to 4.4 million people by 2035 and adding 624,000 people to the county’s total population by 2035 (pp. 26, SCAG 2007b). The same study also indicates that the number of households will increase by the Los Angeles County average (0.9 percent), with an average annual increase of 40,000 new jobs in the next 30 years (pp. 27, SCAG 2007b).

The South Bay Cities Council of Governments Subregion is expected to grow at a slower pace than other subregions in Los Angeles County, by adding people to the county, and increasing population to 1,002,927 million by 2035 (pp. 26, SCAG 2007b). The same study also indicates that the number of households will increase customary to the Los Angeles County average (0.9 percent), with an average annual increase of 40,000 new jobs in the next 30 years (pp. 27, SCAG 2007b).

Table 2 below shows growth statistics for the communities surrounding the project area:

Table 2. Community Population and Household Growth Projections for 2010

Projection	City of Los Angeles	City of Inglewood	Unincorporated South Bay Communities
Total Population	4,057,484	118,466	121,143
Growth Rate	4.4%	1.1%	6.2%
Total Household	1,366,985	37,205	56,409
Growth Rate	5.9%	1.0%	2.2%

Source: City of Los Angeles General Plan; Westchester/Playa Del Rey Community Plan

Potential Impacts

The population growth of Inglewood is projected to continue to increase below 1 percent (0.97%) from 2005 to 2035 according to the Southern California Association of Governments’ (SCAG) 2008 Regional Transportation Plan Projections. This is comparable to the median growth rate for communities in the South Bay Cities Association of Governments and throughout Los Angeles County as illustrated in SCAG population projections. The Arbor Vitae New South Half Interchange Project is not likely to have a substantial effect on growth in the project area or in nearby communities. The potential for growth inducing effects would be the highest on undeveloped and unplanned land because these areas generally have limited existing transportation infrastructure. The Arbor Vitae Project would enhance operations along I-405 that currently experiences a constrained level of freeway and local road access. Growth will emerge in some locations from land uses that change in response to market demands. However, the Arbor Vitae New South Half Interchange Project does not encourage growth on undeveloped and unplanned land, it is consistent with the Circulation Element of the General Plans of the City of Inglewood and the Transportation Element of the City of Los Angeles General Plan. The proposed transportation improvements of this project accommodate existing development. The

proposed project would have no substantial potential for stimulating the location, rate, timing, or amount of growth in or adjacent to the Project Study Area. Development and population growth is not expected to cause substantial externalities to the communities of Inglewood, Westchester, and Lennox surrounding the project area.

Avoidance, Minimization, and/or Compensation Measures

No Avoidance, Minimization, and/or Compensation Measures will be required because this project will not stimulate growth independently of other developments and road projects. The project is compatible with the City of Inglewood General Plan, the City of Los Angeles General Plan, the Playa Del Rey/Westchester Community Plan, LAX Plan, and the Los Angeles County General Plan.

2.1.4 COMMUNITY IMPACTS

To assess affects from the Arbor Vitae Project on surrounding communities; the following areas have been analyzed:

1. Community Character and Cohesion
2. Relocations
3. Environmental Justice

Community Characteristics and Cohesion

Regulatory Setting. The National Environmental Policy Act of 1969 as amended (NEPA), established that the federal government use all practical means to ensure all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings [42 U.S.C. 109(h)] directs that final decisions regarding 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.

Affected Environment

Community profiles and analysis was performed in the Project Study Area as defined by census tracts within three surrounding postal zip codes, and utilizing 2000 U.S. Census data. They are represented as follows:

- 90301 (Inglewood)
- 90045 (Westchester)
- 90304 (Lennox)

Together, the population for the study area totals approximately 105,501 residents. A typical demographic study of the Project Study Area would provide a generalized profile for the area as a whole, but because of the diverse nature of the two neighborhoods surrounding the Arbor Vitae Street Overcrossing at I-405, individual profiles are presented in the following subsections.

Zip Code 90301 – Community of Inglewood

Inglewood has a young population that is primarily African American and Latino. In comparison with Los Angeles County data, the residential population has a higher percentage of children under 5 (9.4 percent versus 7.7 percent) and a lower than average population over the age of 65 (7.0% vs. 9.7%). This area consists mostly of Hispanic and African American (57.3% Hispanic or Latino and 35% African American) residents. In total, seven African American residents will be relocated as a result of this project extension. Among these seven relocated residents, four own single-family homes which average \$416,654 and are well above the City of Inglewood and Los Angeles County averages, \$158,900 and \$209,300, respectively.

Table 3. Racial Characteristics for Zip Code 90301 (Inglewood)

General Characteristics (90301)	Number	Percent	Los Angeles		
			County (number)	Los Angeles County (percent)	United States (percent)
One Race	35,812	95.5	9,049,557	95.1	97.6
White	8,981	23.9	4,637,062	48.7	75.1
Black or African American	13,140	35.0	930,957	9.8	12.3
American Indian and Alaska Native	298	0.8	76,988	0.8	0.9
Asian	662	1.8	1,137,500	11.9	3.6
Native Hawaiian and Other Pacific Islander	77	0.2	27,053	0.3	0.1
Some Other Race	12,654	33.7	2,239,997	23.5	5.5
Two or more races	1,695	4.5	469,781	4.9	2.4
Hispanic or Latino (of any race)	21,474	57.3	4,242,213	44.6	12.5

Source: U.S. Census 2000

Educational attainment in this community is below the Los Angeles County averages, according to Census Data. 56.6 percent of the community's population are high school graduates (in comparison with 69.9 percent in Los Angeles County), and 9.6 percent of the population hold a bachelor's degree or higher (in comparison with 24.9 percent in the county). The educational attainment in the zip code may explain the median household income of \$31,306 and per capita income of \$13,390, which are substantially lower than the county averages (\$42,189 and \$20,683, respectively). The percentage of families below poverty level, 19.7%, is higher than the community of Westchester and the county as a whole (6.9% and 14.4%, respectively).

In general, community characteristics in 90301 indicate a strong transitional nature. The amount of time an Inglewood household is likely to live at one location (housing tenure) is lower than the Westchester zip code 90045. Owner-occupied housing is well below the countywide average (26.6% vs. 47.9%), and approximately 73.4% residents are renters. Chapter 2 of the Inglewood General Plan from 2006 noted that single-family homes throughout the entire city are being torn down or converted into apartment or condominium multifamily housing. In 2000, 64% of residents throughout the city were renters. As a result, the percentage of owner-occupied homes in Inglewood is lower than the Los Angeles County percentage of owner-occupied homes (36.0% vs. 47.9%).

The definition of "poverty" or "low income" populations in the Project Study Area is based on the Department of Health and Human Services poverty guidelines. For 2009, the guideline was \$22,050 for a family of four as shown in Table 4 U.S. Department of Health and Human Services Poverty Guidelines on the following page.

Table 4. U.S. Department of Health and Human Services Poverty Guidelines

Size of Family Unit	2000	2009
1	\$8,350	\$10,830
2	\$11,250	\$14,570
3	\$14,150	\$18,310
4	\$17,050	\$22,050
5	\$19,950	\$25,790
6	\$22,850	\$29,530
7	\$25,750	\$33,270
8	\$28,650	\$37,010
For each additional person, add	\$2,900	\$3,740

Zip Code 90045 – Community of Westchester

Westchester zip code area 90045 is represented by a high level of cultural diversity, educational attainment, and income earned among residents. Racial make-up is predominately White (61.3%) and African American (16.7%), both are higher than Los Angeles County averages for Whites and African Americans 48.7% and 9.8%, respectively. This area also has a lower than average percentage of Hispanics or Latino (23.9%) and Asians (1.8%). The average populations for Hispanics and Asians in Los Angeles County are 48.7% and 11.9%, respectively.

Table 5. Racial Characteristics for Zip Code 90045 (Westchester)

General Characteristics (90045)	Number	Percent	Los Angeles County (number)	Los Angeles County (percent)	United States (percent)
One race	37,290	94.8	9,049,557	95.1	97.6%
White	24,118	61.3	4,637,062	48.7	75.1%
Black or African American	6,580	16.7	930,957	9.8	12.3%
American Indian and Alaska Native	156	0.4	76,988	0.8	0.9%
Asian	3,687	9.4	1,137,500	11.9	3.6%
Native Hawaiian and Other Pacific Islander	171	0.4	27,053	0.3	0.1%
Some other race	2,578	6.6	2,239,997	23.5	5.5%
Two or more races	2,025	5.2	469,781	4.9	2.4%
Hispanic or Latino (of any race)	6,877	17.5	4,242,213	44.6	12.5%

Source: U.S. Census 2000

Educational attainment is above the Los Angeles County averages. According to Census Data, 90.7 percent of the community’s population are high school graduates (in comparison with 69.9 percent in Los Angeles County), and 41.3 percent of the population hold a bachelor’s degree or higher (in comparison with 24.9 percent in the county). Median income (\$56,566) and per capita income (\$28,635) are the highest within the Project Study Area and above the county averages. There are fewer families living below poverty level (6.9 %) compared to Inglewood (zip code 90301), Lennox (zip code 90304), and Los Angeles County (14.4 percent).

There are a number of characteristics that exemplify a strong sense of belonging or community cohesion. In Westchester, the residents over 65 and the number of home owners are the strongest examples of cohesion. Approximately 11.7% of the population, (39,315: 2000 U.S. Census) is over 65 years old. This is much higher than the Los Angeles county average of senior citizens, which is 9.7%. This is critical to community cohesion considering that senior citizens have been known to be more likely to attending community meetings, get involved in civic and religious activities, etc. In addition to s, homeownership is also an indicator that residents feel a strong sense of belonging to their community. In fact, 52.2% of residents in Westchester are homeowners, which is above the Los Angeles County average of 47.9%.

Zip Code 90304 – Community of Lennox

The community of Lennox exists southeast of the Project Study Area. The population has a substantially higher percentage of children under 5 in comparison with Los Angeles County data (10.4 percent versus 7.7 percent) than the Los Angeles County average and a much lower than average of the population over the age of 65 (3.9% vs. 9.7%). The smaller than average senior citizen population is likely to correlate to a lower level of community cohesion. The percentage of individuals classifying themselves as “Hispanic or Latino of any race” (87.1% vs. 44.6%) or “Some Other Race” (54.8% vs. 23.5%) is well above the Los Angeles County average while African American, Asian, and White population percentages are well below the countywide averages.

The community of Lennox has the highest percentage (29.5%) of families living in poverty in the Project Study Area. Educational attainment in this community is well below the Los Angeles County averages, according to 2000 Census Data. 56.6 percent of the community’s population are high school graduates (in comparison with 69.9 percent in Los Angeles County), and 9.6

percent of the population hold a bachelor's degree or higher (in comparison with 24.9 percent in the county). The educational attainment in the zip code may explain the median household income of \$29,036 and per capita income of \$8,950, which is substantially lower than the county averages. 11.6% of the population in the area utilizes public transportation as a means to commute to work, well above the county average of 6.6%. Higher public transportation ridership may be attributed to the relatively high percentage of families living below the poverty threshold as noted above.

Table 6. Racial Characteristics for Zip Code 90304 (Lennox)

General Characteristics (90304)	Number	Percent	Los Angeles County (number)	Los Angeles County (percent)	U.S.
One race	27,301	95.2	9,049,557	95.1	97.6%
White	9,193	32.1	4,637,062	48.7	75.1%
Black or African American	1,411	4.9	930,957	9.8	12.3%
American Indian and Alaska Native	300	1	76,988	0.8	0.9%
Asian	321	1.1	1,137,500	11.9	3.6%
Native Hawaiian and Other Pacific Islander	368	1.3	27,053	0.3	0.1%
Some other race	15,708	54.8	2,239,997	23.5	5.5%
Two or more races	1,378	4.8	469,781	4.9	2.4%
Hispanic or Latino (of any race)	24,968	87.1	4,242,213	44.6	12.5%

Source: U.S. Census 2000

Owner-occupied housing is well below the countywide average (31.9% vs. 47.9%) in this urban neighborhood. Renters occupy a large majority (68.1%) of the housing supply and the community's low number of residents above the age of 65 combine to support the notion that residential sentiment in this area is transitional. The median value of single-family, occupied homes in the area are substantially lower than the countywide average (\$158,900 vs. \$209,300) and the same as zip code 91301 included in the Project Study Area. Community cohesion in this particular area is considered to be low-to-moderate due to the high percentage of renters over homeowners and the lack of residents over the age of 65.

Potential Impacts

Potential Project-Related Traffic Impacts. No existing freeway mainline, on- or off-ramp facilities would be permanently impacted by the construction of the new south half interchange. With a few exceptions, the construction of the new ramps for the proposed half-interchange would take place adjacent to the freeway traffic lanes and can generally be constructed while maintaining traffic conditions on the existing roadway. Existing freeway lanes, collector/distributor lanes, and ramps would likely require only restriping work, as needed. It is anticipated that detoured traffic on local streets would be minimal.

Build Alternative 2 would have led to worse traffic at intersections on Arbor Vitae Street than the No-Build Alternative 1.

The proposed project would not require lengthy closures of freeway facilities in the project area. Intermittent closures of short duration are expected for the southbound I-405 onramp from Olive Street/Manchester Avenue, as well as the northbound collector road onramp. Some circulation interference is also expected along Arbor Vitae Street where the overcrossing would be widened. Temporary construction-related traffic delays would be addressed in the TMP.

Potential Right-Of-Way/Private Property Impacts. To construct the new south half interchange, Alternative 2 would have required the full acquisition of 9 housing units (three single-family residences and six multi-family residential units). A law office and a pest control business on the

northeast side of the Project Study Area would also be acquired. Alternative 1, the No-Build Alternative, would have no right-of-way/private property impacts.

Potential Impacts to Property Values or Local Tax Base. Property values and the local tax base can be affected by multiple external variables not necessarily attributed to the proposed project. These external variables could include, but are not limited to: location, the constantly changing local, regional, and national economic status, public policies, fuel and energy costs, community image and aesthetics, and land and housing availability. Also, the type and number of surrounding businesses, city services, city planning and the fluctuating real estate market also have an effect on property values and the local tax base. Proposed but rejected Alternative 2 would have had some potential to impact general property values and the local tax base. Several foreclosures have occurred in other projects near the vicinity of this project; therefore, foreclosures may be an issue. On a larger regional scale, the impacts of the property acquisitions would be minimal in terms of effects on general property values and the local tax base.

Potential Regional Economic Impacts. The I-405 freeway is the only north-south freeway west of downtown Los Angeles. I-405 connects the South Bay Region, the San Fernando Valley, and the Westside of Los Angeles. The mobility of these portions of Los Angeles County depend upon the I-405. The adjacent interchanges at Manchester Avenue and Century Boulevard are now heavily congested due to local and Los Angeles International Airport (LAX) related traffic. The construction of the new south half interchange would have alleviated current and future congestion at the adjacent Manchester Avenue and Century Boulevard Interchanges. From an economic standpoint, the extreme traffic congestion and circulation issues along I-405 within and surrounding the Project Study Area create regional impacts in terms of increasing the cost of moving goods and loss of productivity. Productivity is typically a system efficiency measure that reflects the degree to which the transportation system performs during peak demand conditions. The efficiency of any transportation system is directly related to the cost of the movement of people and goods.

During construction, some businesses may experience minor economic effects that are a result of temporary circulation and/or access issues related to traffic redistribution. However, the economic benefit of the Arbor Vitae Street New South Half Interchange Project would have improved the overall transportation network. Current conditions already make it difficult for citizens in the surrounding communities to access neighborhood amenities and services, so any improvement to circulation or access along or to or from I-405, Century Boulevard, or Manchester Avenue, would create positive regional economic impacts. The project would improve economic vitality to the surrounding communities by providing direct vehicle access to the University of West Los Angeles west of I-405 and to Hollywood Park Casino east of I-405. Vehicle congestion would be reduced along Century Boulevard and Manchester Avenue and along their onramps and off-ramps as drivers utilize the Arbor Vitae New South Half Interchange's southbound off-ramp and northbound onramp.

Potential Impacts to Local Businesses. Proposed Alternative 2 would have required the acquisition of the Law Office of Hugo Rojas according to a Caltrans-prepared Relocation Impact Report (Caltrans 2008). Hugo Rojas' Law Office and adjacent multi-family residential 3-unit complex are minority-owned commercial and residential properties. The building owned by the Trust of Gene Smith has a pest control business. Also, as discussed in the previous section regarding traffic impacts, local businesses surrounding the project area may experience minor effects that are a result of temporary circulation and/or access issues related to traffic redistribution. No government facilities, businesses or non-businesses such as parks and recreation areas, will be impacted by this project's build alternative.

Potential Impacts on Economic Vitality, Established Business Districts, and Employment. Established business districts immediate to the Arbor Vitae Street New South Half Interchange construction and along South Ash Avenue in Inglewood and La Cienega Boulevard in

Westchester, could experience minimal economic effects that are a result of temporary circulation and/or access issues related to traffic redistribution.

Table 7. Estimated Nonresidential Displacement Units by Alternative

NONRESIDENTIAL	Alternative 1	Alternative 2
Commercial Business	0	2
Industrial/Manufacturing Businesses	0	0
Nonprofit Organizations	0	0
Agricultural/Farms	0	0
TOTAL NONRESIDENTIAL UNITS	0	2
TOTAL UNITS	0	7

Source: State of California Department of Transportation, Relocation Impact Statement, 8/28/2008

Very few improvements and some deterioration to traffic, flow and capacity on local streets due to the completion of the new south half interchange would have also led to more congestion and worse vehicle flow and capacity on the I-405 mainline and many signalized intersections throughout communities within and surrounding the project area. Serious traffic and circulation issues adversely affect both the Century Boulevard and Manchester Avenue Interchanges and the intersections and streets that surround them, including La Cienega Boulevard. This is because development and growth of the surrounding communities and commuters and visitors driving into and out of the Project Study Area have led to vehicular traffic that exceeds the capacity of the existing transportation infrastructure, including the Century Boulevard and Manchester Avenue on- and off-ramps. The project is not anticipated to adversely affect employment in these areas other than the Law Office of Hugo Rojas which will be acquired.

Avoidance, Minimization, and/or Compensation Measures

Measures to Minimize for Potential Project-Related Traffic Impacts. An analysis of the local highway and arterial system in and around the Project Study Area was performed to assess and analyze current traffic operations and circulation conditions and to provide modeling for conditions post-construction for the Build Alternative 2 and the No-Build Alternative 1. It also presents proposals to minimize any project-related traffic to signalized intersections within communities and on the freeway mainlines and on- and off-ramps included in and adjacent to the Project Study Area. A more detailed discussion and analysis of traffic is presented in Section 2.1.6 of this document titled “Traffic and Transportation/Pedestrian and Bicycle Facilities.” Also, a traffic Management Plan (TMP) would be prepared to minimize traffic impacts in the project area.

Relocations

Regulatory Setting. Caltrans’ Relocation Assistance Program (RAP) is based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended) and Title 49 Code of Federal Regulations (CFR) Part 24. The purpose of RAP is to ensure that persons displaced as a result of a transportation project are treated fairly, consistently, and equitably so that such persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole. All relocation services and benefits are administered without regard to race, color, national origin, or sex in compliance with Title VI of the Civil Rights Act (42 U.S.C. 2000d, et seq.).

Affected Environment

The Project Study Area is in an urban, built out environment. According to the project’s Relocation Impact Statement, the Project Study Area includes and is adjacent to about 176

potential replacement residential units and 57 commercial properties that can be rented or purchased for the displaced households and the law office.

Preliminary studies in the Project Study Area indicated that the availability of safe and sanitary replacement housing in the area was more than sufficient and comparable in terms of amenities, public utilities and accessibility to public services, transportation, and shopping. Market availability is expected to remain adequate and there are no other pending Caltrans or public projects in the area that would affect or compete with available housing.

Potential Impacts

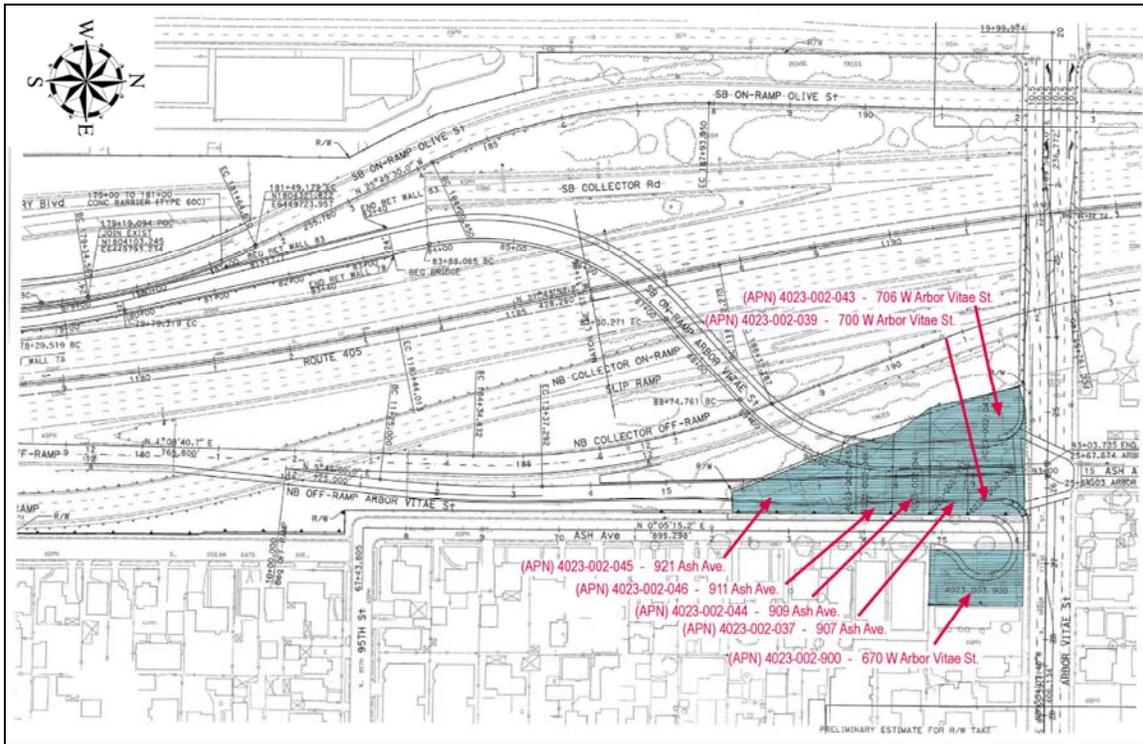
Build Alternative 2 proposed the construction of a new south half interchange from roughly Arbor Vitae Street to Century Boulevard, with the Arbor Vitae Bridge widened from 78 to 90 feet. Relocations would be necessary if this alternative is identified, with the acquisition of 8 housing units (3 single family residences and 6 multi-family residential units), a pest control business, and a law office that are on the northeast side of the project study as illustrated in Table 8 below and Figure 2-06 on the following page (shown in shaded gray areas of layout. There would be no partial takes as part of the build alternative.

Table 8. Estimated Full Residential Displacement Units by Alternative

RESIDENTIAL	Alternative 1	Alternative 2
Owner Occupants of Single Family Residences	0	3
Tenant Occupants of Single Family Residences	0	1
Owner Occupants of Multiple Family Residences	0	1
Tenant Occupants of Multiple Family Residences	0	0
Owner Occupants of Mobile Homes	0	0
Tenant Occupants of Mobile Homes	0	0
TOTAL RESIDENTIAL UNITS	0	5
TOTAL UNITS	0	7

Source: State of California Department of Transportation, Relocation Impact Statement, 8/28/2008

Figure 2-06. Potential Right-of-Way Takings of Build Alternative



Avoidance, Minimization, and Mitigation Measures

Relocations were to be expected with the implementation of Build Alternative 2 according to the project's Relocation Impact Statement. No-Build Alternative 1 has been identified as the Preferred Alternative. It is Caltrans' policy to earmark project funds for relocations and to adequately budget to cover all associated costs and compensation. The Acquisitions Branch purchases the properties and the Relocation Assistance Program (RAP) assists residents and businesses in the relocation process. For Alternative 2, five to six agents were expected to handle all relocations within an estimated time frame of 18 to 24 months. All displacees, as stated in the Relocation Impact Statement, will be contacted by a Right of Way Agent who will ensure that eligible displacees receive their full relocation benefits, including advisory assistance, and that all activities will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as it has been amended. For Alternative 1, no Right of Way takes are needed and therefore no minimization or mitigation measures are required.

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 Clinton on February 11, 1994. This Executive Order 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 2009, it is \$22,050 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

evidenced by its Title VI Policy Statement signed by the agency's director and included in Appendix A of this document.

Affected Environment

The Project Study Area is built out and includes residential, commercial, and industrial land uses. The residences and law office to be affected by Alternative 2 are located on the eastern end of the Project Study Area. The landlords and tenants of the affected properties are predominantly Latino and African American as are the overall residents of City of Inglewood. The City of Inglewood and vicinity east of I-405 are similar in demographic and socioeconomic characteristics. Most households are moderate income to low-income households (see the fourth paragraph under the Zip Code 90301 – Community of Inglewood section). These populations are protected by Executive Order 12898 and Title VI of the Civil Rights Act of 1964.

Potential Impacts

In the United States, the Latino and African American ethnic groups represent two minority groups. However, the proposed project is not expected to result in disproportionate impacts to these two or other minority or low-income communities. As shown in Table 3 and Table 6, adjacent communities to the Project Study Area reflect similar racial and socioeconomic backgrounds. The section labeled Zip Code 90045 – Community of Westchester and Table 5 illustrate that Westchester, located west of I-405, has a population that has a higher percentage of Asian and Caucasian residents, a higher household and per capita income, and less low-income households than in Inglewood and Lennox. However, the Arbor Vitae New South Half Interchange Project can not avoid impacts to Inglewood unless the alignment of I-405 is moved west and thus require many more takings of property on the west side of I-405 as compared to the seven property acquisitions required by Alternative 2. The proposed improvement is anticipated to have a beneficial impact on many but not all Project Study Area residents, including minority and low-income populations, by providing traffic improvements that increase the operational efficiency of existing transit services and provide additional transit services throughout the affected communities. See Table 3, Table 5, and Table 6 to compare the differences in populations between the national majority of White populations, African American populations, and Latino Populations. U.S. Census from 2000 was utilized for the three area codes studied in this document.

The Build Alternative proposed construction of the Arbor Vitae New South Half Interchange Project along the I-405 mainline in order to meet the project's purpose and need. The community (Inglewood) that would be affected by the construction of the Arbor Vitae New South Half Interchange Project is unavoidable due to its location adjacent to the freeway facility. Noise, air quality, traffic, and visual impacts would be increased while the Arbor Vitae Street New South Half Interchange would be constructed. However, these impacts would be temporary and will no longer exist once construction is completed. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Environmental Justice Impacts.

Determination of Disproportionate Effects to Minority and Low-Income Populations

There was a potential to impact minority and low-income populations in zip code 90301 in Inglewood. Alternative 2 would include the full acquisition of residential and commercial property and require 9 residential unit relocations and the relocation of a law office and pest control business in a community with a predominantly Latino and African American population. See Table 9 below for data about the individual properties. None of the impacts resulting from this project are high and adverse and/or disproportionate to minority and low-income populations within the Project Study Area because assistance and compensation would be provided to property owners.

Based on the above discussion and analysis, Build Alternative 2 would not have caused disproportionately high and adverse effects on any minority or low-income populations as per E.O. 12898 regarding environmental justice. Alternative 1 will not cause any disproportionately high and adverse effects to minority and low-income populations as it is a no-build alternative.

Table 9. Minority Status of Affected Property Owners and Tenants

Assessor's Parcel Number (APN)	Address of Property:	Property Owner: Minority or Nonminority	Property: Residents or Tenant(s)	Tenant(s) Minority or Nonminority
4023-002-037	907 Ash Avenue	Minority	Residents	Minority
4023-002-039	700 W Arbor Vitae Street	Nonminority	Tenant (Pest Control)	Business
4023-002-043	706 W Arbor Vitae Street	Minority	Tenants (Residential/Law Office)	Minority
4023-002-044	909 Ash Avenue	Minority	Residents	Minority
4023-002-045	921 Ash Avenue	Minority	Residents	Minority
4023-002-046	911 Ash Avenue	Minority	Residents	Minority
4023-003-900	670 W Arbor Vitae Street	Demolished Property	Demolished	None

Avoidance, Minimization, and Mitigation Measures

Build Alternative 2 was designed to minimize the impacts to the communities affected by the Interstate 405 New South Half Interchange. It reduced the number of right of way takings from 14 full takings and 4 partial takings in the previously considered but rejected Alternative 3 (Southern Interchange with Direct Access to Interstate 405) to seven full takings.

As discussed in the relocations section, relocations are to be expected with the implementation of Build Alternative 2 according to the project's Relocation Impact Statement. To mitigate the impacts of the relocation process to the minority households and business covered by federal Executive Order 12898 Title VI Environmental Justice laws, it is Caltrans' policy to earmark project funds for relocations and to adequately budget to cover all associated costs and compensation for a residence or office of their choice. All displacees, as stated in the Relocation Impact Statement, will be contacted by a Right of Way Agent who will ensure that eligible displacees receive their full relocation benefits.

2.1.5 UTILITIES, COMMUNITY FACILITIES AND EMERGENCY SERVICES

Utilities

Build Alternative 2 is expected to impact existing utilities and right-of-way associated with them, requiring easements and special agreements from managing agencies. The following details were obtained from the Caltrans Division of Project Development, and all costs and specifications are subject to change. More information will be available during the Project, Specifications, and Estimates phase. The estimated utilities relocation costs for Build Alternative 2 are \$7,977,963, with the possibility of escalation to \$10,810,751. These costs include the drilling of 30 potholes to determine the possible relocation of a Southern California Edison natural gas line to run under the I-405 mainline, 700 feet of 8-inch VCP sewer line in the City of Inglewood, 3 sewer holes, and the relocation of 1 overhead electrical pole and 1 high-voltage overhead power tower line to cross over the I-405 mainline.

No utilities relocation costs exist for No-Build Alternative 1.

Community Facilities and Emergency Facilities

Community facilities and services include the schools, police stations, fire stations, and parks and recreational facilities in the area. There will be no discussion of Section 4(f) Resources (open space, parks and recreation facilities, and historical/cultural resources) in this section since there are not any such facilities or activities to be affected by the Build Alternative of this project.

Besides, No-Build Alternative 1 has been identified as the Preferred Alternative. The Inglewood Unified School District (IUSD) in Inglewood, the Lennox School District in Lennox and the Los Angeles Unified School District (LAUSD) in the Westchester community provide primary and secondary public education services. Private institutions within Inglewood, Westchester, and neighboring communities also provide primary and secondary public education services at various costs and locations. Protection and law enforcement is provided by the Inglewood Police Department through its central station and substation serving the Inglewood portion of the Project Study Area, the Lennox Sheriff Station serving the Lennox community within the Project Study Area and the Los Angeles Police Department through the Pacific Community Station serving the Westchester section of the Project Study Area. Further protection is provided by 2 Los Angeles County Fire Department (LACOFD) neighborhood stations (1 in Inglewood and 1 in Lennox) and 1 Los Angeles (City) Fire Department (LAFD) neighborhood station in Westchester. These stations provide fire protection and firefighting, emergency care, hazardous materials and disaster response, and community service. Parks and recreation facilities are planned, developed, and managed by the City of Inglewood Department of Parks, Recreation, and Community Services and the City of Los Angeles Department of Recreation and Parks.

Schools. The proposed Build Alternative 2 would not have posed any relocation or adverse impacts to any schools in the project area, but schools adjacent to the project area may experience temporary effects during construction in terms of associated accessibility and/or noise issues. During the construction phases of the project, noise from construction activities will temporarily and intermittently dominate the noise environment in the immediate area of construction. Construction noise is regulated by Caltrans Specifications, Section 7-1.011, "Sound Control Requirements." These requirements state that noise levels generated during construction shall comply with applicable local, state, and federal regulations that all equipment shall be fitted with adequate mufflers according to the manufacturers' specifications. A list of schools within 4 miles of the project area is provided on the next page, complete with their approximate distance from the project area (as determined by distance from the intersection of I-405 and the Arbor Vitae Street Overcrossing).

Table 10. Community Schools Within Four Miles of Project Area

Name	Address	Community	Zip Code	Miles from Project Area
PRE-K/KINDERGARTEN SCHOOLS				
Buford Pre-School	10915 South Felton Avenue	Inglewood	90304	1.5
Century Park Elementary (Pre-Kindergarten through 5th Grade)	10935 South Spinning Avenue	Inglewood	90303	4.1
Head Start and Child Development Program	10409 South Tenth Avenue	Inglewood	90303	3.2
Head Start	4949 West 104th Street	Inglewood	90304	1.4
Higher Learning Academy	534 West Arbor Vitae Street	Inglewood	90301	0.3
Inglewood Christian School	215 East Hillcrest Boulevard	Inglewood	90301	0.3
La Tijera United Methodist Church Preschool	7400 Osage Avenue	Westchester	90045	2.0
University of Children Montessori School	1518 Centinela Avenue	Inglewood	90302	2.0
Westchester Lutheran School (Kindergarten)	7831 South Sepulveda Boulevard	Westchester	90045	3.7
Wilder's Preparatory Academy (Kindergarten)	830 North La Brea Avenue	Inglewood	90302	2.4
Wiz Child Development Center	121 West Arbor Vitae Street	Inglewood	90301	0.8
ELEMENTARY/MIDDLE SCHOOLS				
Albert Monroe Middle School	434 South Grevillea Avenue	Inglewood	90301	1.2
Beulah Payne Elementary	215 West 94th Street	Inglewood	90301	0.7
Bennett-Kew Elementary	11710 South Cherry Avenue	Inglewood	90303	1.4
Buford Elementary	4919 West 109th Street	Lennox	90304	1.6
Calvary Christian School	2400 West 85th Street	Inglewood	90305	1.4
Centinela Elementary	1123 Marlborough Avenue	Inglewood	90302	3.3
Century Academy for Excellence	2400 West 85th Street	Inglewood	90305	1.4
Century Community Charter School	901 South Maple Street	Inglewood	90301	1.1
Clyde Woodworth Elementary	3200 West 104th Street	Inglewood	90303	3.1
Crozier Middle	120 West Regent Street	Inglewood	90301	1.5
Culture and Language Academy of Success	2930 West Imperial Highway	Inglewood	90303	3.9
Daniel Freeman Elementary	2602 West 79th Street	Inglewood	90305	3.7
Delores Huerta Elementary	11036 Hawthorne Boulevard	Inglewood	90304	2.2
Delores Huerta Elementary	4125 West 105th Street	Lennox	90304	2.0
Felton Elementary	10417 Felton Avenue	Lennox	90304	1.1
Frank D. Parent Elementary	5354 West 64th Street	Inglewood	90302	2.6
Highland Elementary	430 Venice Way	Inglewood	90302	1.9
Hudnall Elementary	331 West Olive Street	Inglewood	90305	1.1
Jefferson Elementary	10322 Condon Avenue	Lennox	90304	1.3
K Anthony Elementary	8420 Crenshaw Boulevard	Inglewood	90305	3.2
K Anthony's School	1003 South Prairie Avenue	Inglewood	90301	1.5
Kelso Elementary	809 East Kelso Street	Inglewood	90301	1.6
Kenneth L. Moffett Elementary	11050 Larch Avenue	Lennox	90304	2.2
La Tijera Elementary	1415 North La Tijera Boulevard	Inglewood	90302	2.0
Lennox Middle	11033 Buford Avenue	Lennox	90304	1.6
Monroe Middle	10711 South 10th Avenue	Inglewood	90303	3.5
Oak Street Elementary	633 South Oak Street	Inglewood	90301	0.4
Open Charter Magnet School	5540 West 77th Street	Westchester	90045	1.7
Saint John Chrysostom Elementary	530 East Florence Avenue	Inglewood	90301	2.3
San Pedro Academy	1145 West Manchester Avenue	Westchester	90044	0.8
Slauson Learning Center	260 North Locust Street	Inglewood	90301	1.9
South Bay Lutheran Preparatory Academy	3600 West Imperial Highway	Inglewood	90303	3.5
Warren Lane Elementary	9330 South 8th Avenue	Inglewood	90305	3.5
Westchester Lutheran School (1st through 8th Grade)	7831 South Sepulveda Boulevard	Westchester	90045	3.7
Wilder's Preparatory Academy (1st through 8th Grade)	830 North La Brea Avenue	Inglewood	90302	2.4
Worthington Elementary	11101 South Yukon Avenue	Inglewood	90303	3.2
HIGH SCHOOLS				
Animo Leadership High	1155 West Arbor Vitae Street	Inglewood	90301	0.4
City Honors High	155 West Kelso Street	Inglewood	90301	1.2
Hillcrest Academy High	441 West Hillcrest Boulevard	Inglewood	90301	0.7
Inglewood Community Adult School	106 East Manchester Boulevard	Inglewood	90301	1.4
Inglewood High	231 South Grevillea Avenue	Inglewood	90301	1.5
Lennox Mathematics, Science and Technology Academy	11036 Hawthorne Boulevard	Lennox	90301	1.6
Morningside High	10500 South Yukon Avenue	Inglewood	90303	2.7
Saint Mary's Academy	701 Grace Avenue	Inglewood	90301	2.3

Source: Trulia.com search of zip codes: 90045, 90301, and 90304

Emergency Services. No long-term impacts are anticipated for fire, police, and emergency response services as a result of the proposed project's Build Alternative 2. While project construction may create temporary yet minimal impacts in regard to emergency response times, the end result will improve traffic and circulation times for fire, police, and emergency services. Appropriate detours will be implemented as well as plans for proper fire, police, and emergency access during construction. Funds have been allocated to provide a Traffic Management Plan

(TMP), which is developed and incorporated as part of the project design prior to the onset of construction and to minimize disruption to the existing flow conditions. More information on the TMP can be found in Section 2.1.6 of this document entitled “Traffic and Transportation/Pedestrian and Bicycle Facilities.”

Table 11. Police and Fire Stations Serving Communities in the Project Area

Station	Address	Community	Zip Code	Miles from Project Area
COMMUNITY POLICE STATIONS				
Inglewood Police Headquarters	One Manchester Boulevard	Inglewood	90301	1.5
Inglewood Beat 2 Community Police Station	129 West Arbor Vitae Street	Inglewood	90301	0.8
City of Los Angeles Pacific Community Police Station	12312 Culver Boulevard	Westchester	90045	4.7
County of Los Angeles Lennox Sheriff Station	4331 West Lennox Boulevard	Lennox	90304	2.0
NEIGHBORHOOD FIRE STATIONS				
City of Los Angeles Fire Station 5	8900 Emerson Avenue	Westchester	90045	2.7
City of Los Angeles Fire Station 51	10435 South Sepulveda Boulevard	Westchester	90045	3.2
City of Los Angeles Fire Station 95	10010 International Road	Westchester	90045	0.9
County of Los Angeles Fire Station 171	141 West Regent Street	Inglewood	90301	1.7
County of Los Angeles Fire Station 18	4518 West Lennox Boulevard	Lennox	90304	1.8

Source: City of Inglewood Police Department, City of Los Angeles Fire Department, City of Los Angeles Police Department, County of Los Angeles Fire Department, County of Los Angeles Sheriff Department

2.1.6 TRAFFIC AND TRANSPORTATION/PEDESTRIAN AND BICYCLE FACILITIES

Traffic

The Arbor Vitae Street New South Half Interchange Improvement Project proposed to construct a new south half interchange on Interstate 405 (or I-405, a north-south principle highway) at Arbor Vitae Street (an east-west city arterial) in the City of Inglewood to alleviate current and future congestion at two adjacent interchanges to the north and south—Manchester Avenue and Century Boulevard, respectively.

TRAFFIC AND TRANSPORTATION

Affected Environment

A Project Study Area was defined to assess the impact of project related traffic impacts on the community at large. The project area is located on Interstate 405 (I-405) at Arbor Vitae Street in the westernmost portions of the City of Inglewood, and adjacent to the City of Los Angeles limits (post miles 22.2-23.4). The purpose of the project is to alleviate congestion issues at the I-405/Manchester Avenue interchange to the north of Arbor Vitae Street, and at the I-405/Century Boulevard interchange to the south, by providing an additional access point to major venues in the Project Study Area, namely Centinela Hospital, Hollywood Park Casino, and the Forum. Volume, Capacity, and Level of Service (LOS) analyses have been performed for the I-405 freeway mainline and on- and off-ramp segments from Manchester Avenue and Century Boulevard on the north and south, and signalized city arterial intersections from Los Angeles International Airport on the west to Prairie Avenue on the east. See Figure 1-03. Arbor Vitae Project Map

Currently, the I-405 interchanges at Manchester Avenue and Century Boulevard are operating at or beyond their capacity limits during AM and PM peak travel periods. The two interchanges present challenges in the local arterial system that manifest in circulation issues and a deterioration of Level of Service, or “LOS” (measurements of delay, density, and travel time). Traffic studies reveal that LOS at most on- and off-ramp segments at Manchester Avenue and Century Boulevard are expected to deteriorate to LOS “D” or “E” by the year 2035 if congestion issues are not addressed.

Interstate 405 is widely known as one of the busiest freeways in metropolitan Los Angeles and in the world. The proposed project would not have produced any significant operational improvements on the I-405 freeway mainline, and only small improvements to the Century Boulevard and Manchester Avenue Interchanges and some Project Study Area intersections.

Interstate 405 Freeway Mainline in the Project Study Area. The San Diego Freeway (Interstate 405, or I-405) is one of the principle north-south interstate highways in Southern California. The southernmost origin of Interstate 405 begins in the City of Irvine at the Golden State Freeway (or Interstate 5), and terminates at its northernmost point near the community of Mission Hills in the City of Los Angeles. Interstate 405 also serves as a major bypass to Interstate 5, and has played a historically significant role in the development of cities and suburbs and regional employment and commercial centers served by this arterial in the westernmost portions of Los Angeles and Orange Counties. Consequently, it is heavily utilized by commuters and freight truck traffic, and is considered one of the busiest and most congested freeways in the United States and the world. Additionally, the Interstate 405 freeway serves as a vital link in access to the world's fifth busiest airport, Los Angeles International Airport (LAX). The Glen Anderson Freeway (or Interstate 105) intersects Interstate 405 in an east-west direction roughly two (2) miles south of Arbor Vitae Street and also serves as a vital circulation link to LAX.

Signalized Intersections in the Project Study Area. An analysis of the local highway and arterial system in and around the Project Study Area was performed to assess and analyze current circulation conditions and to provide modeling for conditions post-construction. West of the Project Study Area, the Los Angeles International Airport (LAX) is the major venue served by the local highway and arterial system. State Route 1 (SR-1), or Lincoln Boulevard, is a Class I Major Highway that carries traffic in a north/south direction to/from Marina Del Rey in the north, and to El Segundo, Redondo Beach and other points in the south. SR-1 converges with another Class I Major Highway, Sepulveda Boulevard, as it approaches LAX, and it parallels the I-405 freeway, which exits roughly 1.5 miles to the east. In the same area, the aforementioned arterials are supported by two additional north/south arterials, Aviation and Airport Boulevards, which are classified as Class II Major City Highways.

Arbor Vitae Street originates at Airport Boulevard and traverses the Project Study Area in an east-west direction. Traveling east, Arbor Vitae Street intersects La Cienega Boulevard, or what was proposed to be State Route 170 (SR-170, or the La Cienega Freeway) many years ago. This route has since been removed from the state highway program, but SR-170 would have aided in improving circulation in the area through a direct north-south connection from State Route 90 in the north to Los Angeles International Airport. In fact, a good portion of La Cienega Boulevard between Manchester Avenue (the former State Route 42) and Rodeo Road was constructed to freeway standards, but it has since become a "pseudo-expressway" maintained by Los Angeles County.

Just east of the intersection of La Cienega Boulevard and Arbor Vitae Street, the Arbor Vitae Street arterial crosses over the I-405 freeway and intersects Inglewood and La Brea Avenue (classified as a Class II Major City Highway) continuing east. Arbor Vitae Street continues further east approximately half of a mile before terminating at Prairie Avenue (also classified as a Class II Major City Highway).

The purpose of the proposed project is to alleviate congestion on the adjacent Manchester Avenue and Century Boulevard interchanges, but the most significant improvements would occur on the local highways and arterials in the Project Study Area. Implementation of Alternative 2 would have aided in improving circulation, and provide additional/alternative access to LAX on the west, and Centinela Hospital, Hollywood Park Casino, and the Forum on the east.

Potential Impacts—Interstate 405 Freeway Mainline, and Ramp and Weaving Segments

The freeway mainline analysis for the proposed project is based on methodology published in the Highway Capacity Manual (HCM) 2000. Freeway facilities are composed of connected segments, where each segment may be a basic freeway segment, ramp segment, or weaving segment.

- **Basic Freeway Segments.** These segments are not subject to merge activity.

Each of these types of segments has different operational characteristics, and different analysis procedures. Analysis and methodology of each segment as it pertains to the proposed project follows, utilizing guidelines from the appropriate chapter of the HCM 2000.

Basic Freeway Segments. The measure used to provide an estimate of Level of Service (LOS) is density, where density is calculated from the average vehicle flow rate per lane and the average speed (pc/mi/h). The following figure illustrates the concept of LOS as it pertains to basic freeway segments, and the associated conditions and technical descriptions. The proposed pavement structural section is based on a Traffic Index of 14.

The specification of maximum densities for LOS A through D is based on the collective professional judgment of the members of the Committee on Highway Capacity and Quality of Service for the Transportation Research Board. The upper value for LOS E is the maximum density at which sustained flows at capacity are expected to occur. Failure, breakdown, congestion, and LOS F occur when queues begin to form on the freeway. Density (pc/mi/h) tends to increase sharply within the queue and may be considerably higher than the maximum value of (45) passenger cars per lane per mile.

Basic freeway segments have uniform traffic conditions and roadway characteristics, such as the number of lanes, shoulder clearance, and grade.

In the I-405/Arbor Vitae Street Interchange Traffic Analysis, data analysis of existing volumes and existing and future SCAG demands was conducted to develop procedures for estimating future demands. The resulting mainline freeway growth rates between existing conditions and 2035 was 5.0 percent. The local street (intersection) growth rate was 15.6 percent.

In an analysis of the preceding data, and comparison of both the Alternative 1 No-Build scenario and the Build Alternative 2 scenario, it becomes evident that the proposed project will not improve operations and LOS on the Interstate 405 freeway mainline. The purpose of the proposed project is to alleviate congestion at the I-405/Manchester Avenue and I-405/Century Boulevard interchanges and improve safety by improving accident rates and not to increase capacity or alleviate congestion on the freeway mainline. In fact, I-405 mainline operations in the vicinity of the project area can be expected to deteriorate due to ambient growth in traffic volumes alone according to data from Caltrans Freeway Operations Office.

The proposed project will not require lengthy closures of freeway facilities in the project area. Intermittent closures of short duration are expected for the southbound I-405 onramp from Olive Street/Manchester Avenue, as well as the northbound collector road onramp. Some circulation interference is also expected along Arbor Vitae Street where the overcrossing would be widened. Construction related traffic delays are not expected to be significant.

The Recently Revised Traffic Analysis for this project analyzed 33 local street intersections within and adjacent to the Project Study Area and a segment of the Interstate 405 Freeway from La Cienega Boulevard south to El Segundo Boulevard south of Interstate 105.

Traffic conditions at signalized intersections were evaluated using HCM 2000 operations methodology, which evaluates capacity in terms of the volume-to-capacity ratio and evaluates LOS based on controlled delay per vehicle. Controlled delay is defined as the portion of the total delay attributed to the traffic signal operation including deceleration delay, queue move-up time,

stopped delay, and final acceleration delay. The relationship between controlled delay per vehicle and LOS for signalized intersections is summarized in Table 12 LOS for Signalized Intersections on the following page.

Figure 2-07. Level of Service for Freeways

LEVELS OF SERVICE for Freeways			
Level of Service	Flow Conditions	Operating Speed (mph)	Technical Descriptions
A		70	Highest quality of service. Traffic flows freely with little or no restrictions on speed or maneuverability. No delays
B		70	Traffic is stable and flows freely. The ability to maneuver in traffic is only slightly restricted. No delays
C		67	Few restrictions on speed. Freedom to maneuver is restricted. Drivers must be more careful making lane changes. Minimal delays
D		62	Speeds decline slightly and density increases. Freedom to maneuver is noticeably limited. Minimal delays
E		53	Vehicles are closely spaced, with little room to maneuver. Driver comfort is poor. Significant delays
F		<53	Very congested traffic with traffic jams, especially in areas where vehicles have to merge. Considerable delays

Source: Highway Capacity Manual (HCM) 2000, Chapter 23 – Basic Freeway Segments

Approximately 36 percent of the intersections currently operate at Levels of Service (LOS E or LOS F), beyond their capacity to handle existing vehicle traffic. The highest delays are along the Century Boulevard and Manchester Avenue arterials as shown in Table 13 Arterial Travel Time and Level of Service (LOS) on the following pages.

Table 12. LOS for Signalized Intersections

LOS	Description of Traffic Conditions	Controlled Delay (sec/veh)
A	Insignificant delays; no approach phase is fully utilized and no vehicle waits longer than one red indication.	<= 10.0
B	Minimal delays; an occasional approach phase is fully utilized. Drivers begin to feel restricted.	> 10.0-20.0
C	Acceptable delays; major approach phase may become fully utilized. Most drivers feel somewhat restricted.	> 20.0-35.0
D	Tolerance delays; drivers may wait through more than one red indication. Queues may develop but dissipate rapidly, without excessive delays.	> 35.0-55.0
E	Significant delays; volumes approaching capacity. Vehicles may wait through several cycles and long vehicle queues form upstream.	> 55.0-80.0
F	Excessive delays; represents conditions at capacity, with extremely long delays. Queues may block upstream intersections.	> 80.0

Source: Highway Capacity Manual (HCM) 2000 Chapter 25 – Ramps and Ramp Junctions
 sec/veh = seconds per vehicle

Alternative 1 was the No-Build Alternative. Alternative 2 is the same Build Alternative 2 as included in this environmental document.

For No-Build Alternative 1, predicted future vehicle traffic will lead to increased delay in 2035. At the 32 Study Area Intersections (excluding the Interstate 405/Arbor Vitae Street Half Interchange which would not be built in this scenario), the average delay would increase by 44 percent (45 to 65 seconds/vehicle) in the AM peak hour and by 35 percent (49 to 66 seconds/vehicle) in the PM Peak Hour. See Table 13 Intersections Operations Results on the following page. Most of the congested intersections are located on the Century Boulevard or Manchester Avenue arterial segments. In the AM peak hour, 33% of the arterial segments will operate at LOS E or F. In the PM peak hour, 58% of the arterial segments will operate at LOS E or F.

An opposite outcome will result from Alternative 2. The half interchange will improve LOS and reduce average delay per vehicle in 2035 along the Century Boulevard or Manchester Avenue arterial segments in comparison with No-Build Alternative 1 during the AM and PM Peak Hour. However, the intersections on Arbor Vitae Street will have their LOS grades deteriorate by 32 percent after the half interchange is constructed in the AM Peak Hour and 47 percent in the PM Peak Hour versus Alternative 1. In both peak hours, there is an improvement in arterial LOS as compared to Alternative 1. In the AM peak hour, 25% of arterial segments will operate at LOS E or F. In the PM peak hour, 50% of arterial segments will operate at LOS E or F.

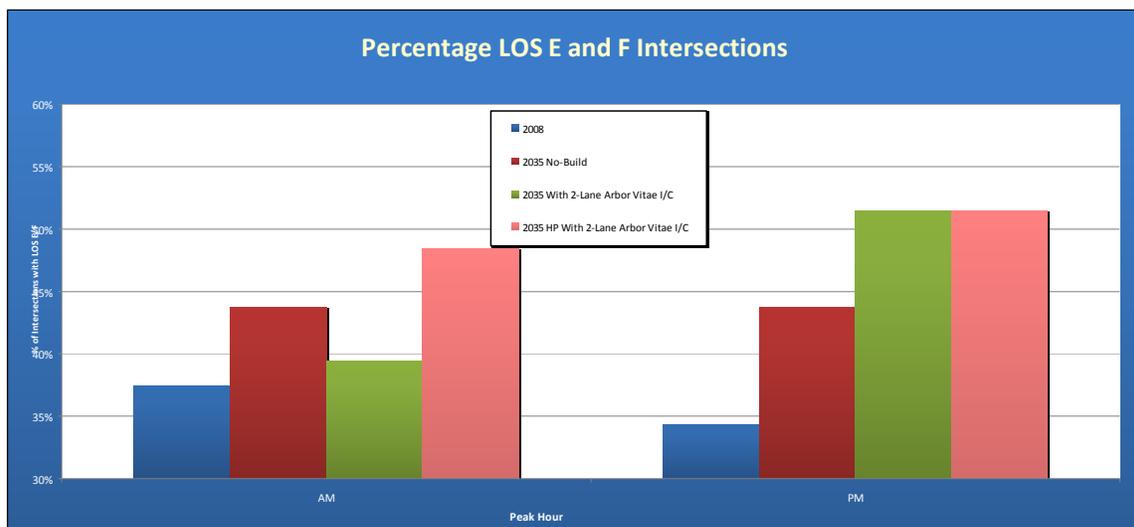
Table 13. Arterial Travel Time and Level of Service (LOS)

Arterial	Area	Direction	AM					
			Alt 1		Alt 2		Alt 2 w/ HP*	
			LOS	Travel Time	LOS	Travel Time	LOS	Travel Time
Manchester Boulevard	East of I-405	EB	C	273	C	259	C	259
		WB	E	404	D	385	E	440
	West of I-405	EB	C	279	C	272	C	272
		WB	F	716	E	538	E	543
Arbor Vitae Street	East of I-405	EB	C	297	D	368	E	415
		WB	D	302	D	378	E	454
	West of I-405	EB	C	327	D	356	D	354
		WB	C	269	C	269	C	271
Century Boulevard	East of I-405	EB	C	267	C	263	C	266
		WB	F	752	F	629	F	788
	West of I-405	EB	C	292	C	286	C	288
		WB	E	522	E	474	E	479

Arterial	Area	Direction	PM					
			Alt 1		Alt 2		Alt 2 w/ HP*	
			LOS	Travel Time	LOS	Travel Time	LOS	Travel Time
Manchester Boulevard	East of I-405	EB	E	501	E	446	E	533
		WB	C	260	C	275	C	248
	West of I-405	EB	E	448	E	422	E	417
		WB	E	433	D	337	D	348
Arbor Vitae Street	East of I-405	EB	E	474	F	782	F	1104
		WB	D	304	D	319	D	362
	West of I-405	EB	D	369	F	863	F	878
		WB	C	260	C	277	C	281
Century Boulevard	East of I-405	EB	F	551	E	536	F	616
		WB	D	354	C	326	D	357
	West of I-405	EB	E	517	E	496	E	535
		WB	E	405	D	377	D	378

*Note: HP - Hollywood Park Development

Figure 2-08. Percentage LOS E and F Intersections

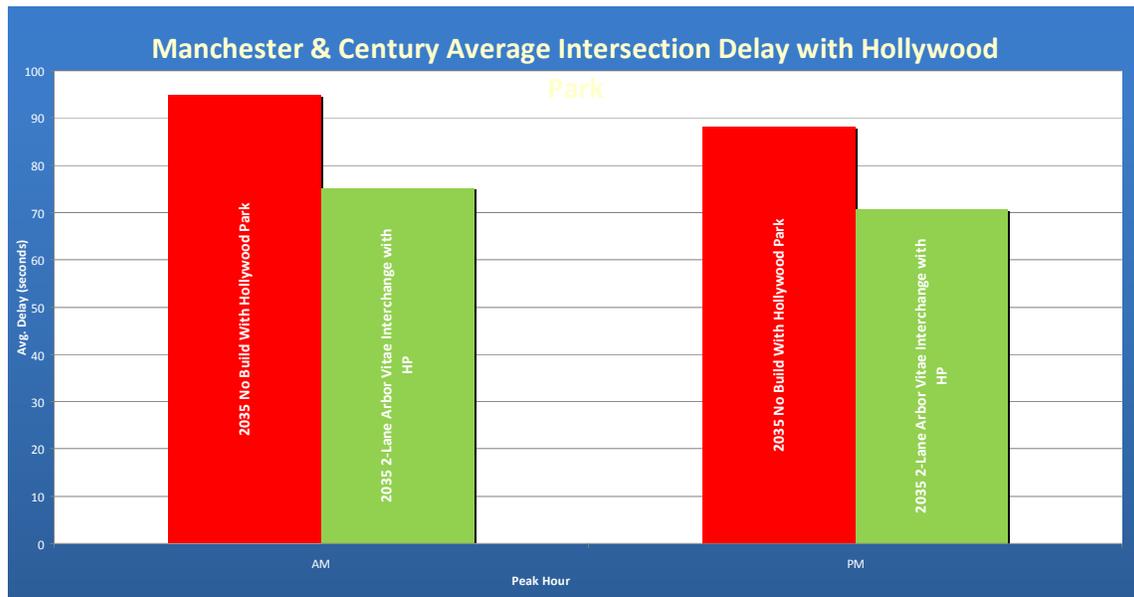


Hollywood Park Sensitivity Analysis Results

A sensitivity analysis was conducted to determine future alternative operations with the addition of new trips associated with the proposed Hollywood Park development.

With the addition of Hollywood Park trips, operations will worsen for all alternatives (1, 2), but the conclusions are generally the same. The total overall network average delay is lower than No-Build Alternative 1 for each of the build alternatives, except Alternative 2 in the PM peak hour. On Manchester Avenue and Century Boulevard corridors, traffic delay is reduced for all build alternatives versus No Build Alternative 1. Therefore, with the Hollywood Park development, it is likely that somewhat more improvements would be needed to achieve the same level of improvement on the Manchester Avenue and Century Boulevard corridors.

Figure 2-09. Manchester & Century Average Intersection Delay with Hollywood Park



Conclusions

The proposed Arbor Vitae Street interchange improvements will result in benefits to local roads except for Arbor Vitae Street and minor impacts to the Interstate 405 mainline. However, the overall change to the freeway system will be negligible.

The proposed Arbor Vitae Half Interchange did offer clear benefits to operations on some of the local roads such as Manchester Avenue and Century Boulevard. However, it would create substantial delays on Arbor Vitae Street.

Traffic Management Plan (TMP). For Alternative 2, a TMP was prepared based on the preliminary stage construction concept that has been developed for the proposed project, and is subject to change at any time, especially as the project design is finalized. With a few exceptions, the construction of the new ramps for the proposed half-interchange will take place adjacent to freeway mainline traffic and can generally be constructed while maintaining traffic conditions on the existing roadway. Existing freeway mainline, collector/distributor lanes, and ramps will likely require only restriping work, as needed. It is anticipated that detoured traffic on local streets will be minimal. A preliminary construction staging plan has been prepared, nevertheless, to minimize traffic impacts in the project area, and areas adjacent. At this time, only the staging plan has been developed, and the duration of activities have not yet been estimated. This preliminary staging

plan is presented in Table 14 below, and is also subject to change at any time as the project approaches finalization in design. Neither a TMP nor a construction staging plan is needed for Preferred No-Build Alternative 1.

Table 14. Preliminary Construction Staging Plan to Minimize Traffic Impacts

Overall Project	Segment	Lane Number	Work Description
Stage 1	I-405 and Arbor Vitae Street Overcrossing	8, 6	Construction work areas will be set up adjacent to traffic lanes so that excavation work, retaining wall construction and bridge wall construction can begin.
Stage 2	Century Blvd. and Arbor Vitae Street Overcrossing	6, 6	Grading work and retaining wall construction will begin. Where feasible, soundwalls will be constructed during this stage. Bridge construction will begin at 3 locations. The Century Collector Overcrossing Bridge on NB Off-ramp Collector Road will be replaced, a new multi-span bridge will be constructed for the new WB On-ramp from Arbor Vitae Street and the Arbor Vitae Overcrossing will be widened.
Stage 3	I-405 and Arbor Vitae Street Overcrossing	8, 6	The remainder of the roadwork will be completed. The work may require some intermittent closures of short duration for various freeway facilities in the area.
Century Connector Overcrossing			
Stage 1	NB I-405 Onramp Bridge at Century Blvd.	2	Retaining walls will be constructed and a temporary roadway for a NB collector road on-ramp going over the NB collector road off-ramp will be constructed to detour traffic. A temporary bridge will be constructed to accommodate the detour
Stage 2	New Century Collector Overcrossing	2	A portion of the new Century Collector Overcrossing will be completely constructed. Northbound Collector on-ramp traffic will be back to its original alignment and the temporary bridge is removed
Stage 3	NB I-405 Onramp Bridge at Century Blvd.	2	The temporary detour will be removed and the remainder of the Century Collector Overcrossing will be constructed.
Southbound Arbor Vitae Street On-ramp Bridge			
Stage 1	SB I-405 On-ramp Bridge at Arbor Vitae Street	2	Columns and abutments for widened bridge structure will be constructed.
Stage 2	SB I-405 On-ramp Bridge at Arbor Vitae Street	2	The bridge superstructure will be constructed.
Arbor Vitae Street Overcrossing Widening			
Stage 1	I-405 and Arbor Vitae Street Overcrossing	6	Columns and abutments for widened bridge structure will be constructed.
Stage 2	I-405 and Arbor Vitae Street Overcrossing	8	The bridge superstructure will be constructed.

Source: LA405/Arbor Vitae New South Half Interchange Traffic Management Plan (TMP)

The following elements may be included in the TMP to help in minimizing temporary traffic impacts:

- 1) Public Awareness Campaign to inform motorists of proposed construction
- 2) Construction Zone Enhanced Enforcement Program (COZEEP). This is a program administered by the Resident Engineer to minimize safety impacts not only to the community at large, but possible safety impacts to construction workers such as the reduction of speed of traffic in work zones. The program can be very effective in enhancing safety in the project zone.
- 3) Portable and changeable messaging signage
- 4) Implementation of a traffic management team
- 5) If identified, cooperative agreements with local agencies will be developed to provide enhanced infrastructure on local arterials. Detours on local streets are expected to be minimal.

Transportation/Pedestrian and Bicycle Facilities

Considerations. Caltrans as assigned by FHWA, directs that full consideration should be given to the safe accommodation of pedestrian and bicyclists during the development of federal-aid highway projects (see 23 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 detrimental effects on all highway users who share the facility.

Caltrans is committed to carrying out the 1990 American with Disabilities Act (ADA) by building transportation facilities that provide equal access for all persons. The same degree of convenience, accessibility, and safety available to the general public will be provided to persons with disabilities.

The accommodation of pedestrians and bicyclists, and full compliance with ADA standards would have been an integral part in the development of the Alternative 2 (had it been identified as the Preferred Alternative) and the Transportation Management Plan (TMP), which would have outlined specific design guidelines to ensure proper facilities and access during and after project construction. As No-Build Alternative 1 has been identified as the Preferred Alternative, these measures are no longer necessary. It is Caltrans' and the Contractor's responsibility to provide for the safety of the public during construction.

2.1.7 VISUAL/AESTHETICS

Regulatory Setting. The National Environmental Policy Act of 1969 as amended (NEPA) establishes that the federal government use all practicable means to ensure all Americans safe, healthful, productive, and *aesthetically* and culturally pleasing surroundings [42 U.S.C. 4331(b)(2)]. To further emphasize this point, the Federal Highway Administration in its implementation of NEPA [23 U.S.C. 109(h)] directs that final decisions regarding 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.

Visual Impact Assessment (VIA). A VIA has been prepared by Caltrans' Division of Landscape Architecture according to guidelines set forth by the Federal Highway Administration (FHWA). While the project does not have the potential to affect any officially designated scenic highways, a VIA was performed, nevertheless, that aims to:

- Define the project setting and viewshed
- Identify key views for visual assessment
- Analyze existing visual resources and viewer response
- Analyze attributes such as line, form, color, texture, dominance, scale, diversity, and continuity
- Analyze visual quality as measured by vividness, intactness, and unity
- Depict the visual appearance of project alternatives
- Assess the visual impacts of project alternatives
- Propose methods to avoid, minimize, and/or mitigate adverse visual impacts through methods such as enhanced plantings, texture, color coating for structures, and contour grading

Affected Environment

The following information in this section was derived from the Caltrans VIA prepared in August of 2008 (Caltrans 2008). The regional landscape establishes the general visual environment in the project area. However, the specific visual environment upon which the assessment is focused was determined by defining landscape units and the project viewsheds. Most of the land adjacent to the project area is highly developed and mostly commercial, residential, or industrial. The I-405 freeway is adjacent to the Hollywood Park Casino, the Forum, and the Los Angeles International Airport (LAX). These facilities are in clear view from the project area. The freeway landscape within this corridor consists of oleander, ice plant, ivy, grasses, Mexican fan palms, tall pines, Eucalyptus, and other evergreen trees.

Residential Area. A residential area east of Interstate 405 is present within the City of Inglewood within the Project Study Area. The area consists of one-story, single-family residential homes,

two-story, single-family residential homes, and two-story, multi-family residential complexes. Dominant visual resources in this portion of the Project Study Area include the homes and yards themselves, streets and sidewalks, and the retaining and sound walls along I-405. The viewshed within the residential area is limited, with views of mass plantings of trees and shrubs and metal fences.

Viewer Response. Viewer Response is comprised of two elements: viewer sensitivity and viewer exposure. These elements combine to form a method of predicting how the public might react to changes brought about by the I-405 Arbor Vitae New South Half Interchange Project. Viewer sensitivity is defined as the viewers' concern for scenic quality and response to change in visual resources that make up a view. Viewer exposure is typically assessed by measuring the number of viewers exposed to the resource change, type of viewer activity, duration of their view, speed at which the viewer moves, and the position of the viewer.

The Visual Impact Assessment identifies the resident viewer group as most sensitive to any impacts or disturbance to existing visual resources. The resident viewer group includes people who may have views of the project from their homes or place of business/employment. Residents have a high level of exposure to the visual environment and high visual awareness. The group tends to be stationary and have more time to take in the surrounding views. In addition, they become more familiar with the local environment than other groups and typically take more ownership in it. This group is considered to be highly sensitive to visual changes, particularly if important visual resources are lost as a result of relocation or acquisition of property in the project area.

Potential Impacts

Because it is not feasible to analyze all the views in which the proposed project would be seen, the Visual Impact Assessment (VIA) focuses on a select number of key viewpoints where potential for impacts to the existing visual environment is most clear. The following area map shows four (4) viewpoints of study, followed by representations of the existing visual environments and post-construction visual simulations with the proposed structures in place. These visual analyses have been done for Build Alternative 2 and some of the visual simulations do not apply to No-Build Alternative 1. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Visual/Aesthetics Impacts.

VIEWPOINT 1

Southbound View of Interstate 405 from Manchester Avenue Onramp 1

See Viewpoint 1 of Figure 2-10 Eleven Identified Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405 on the following page.

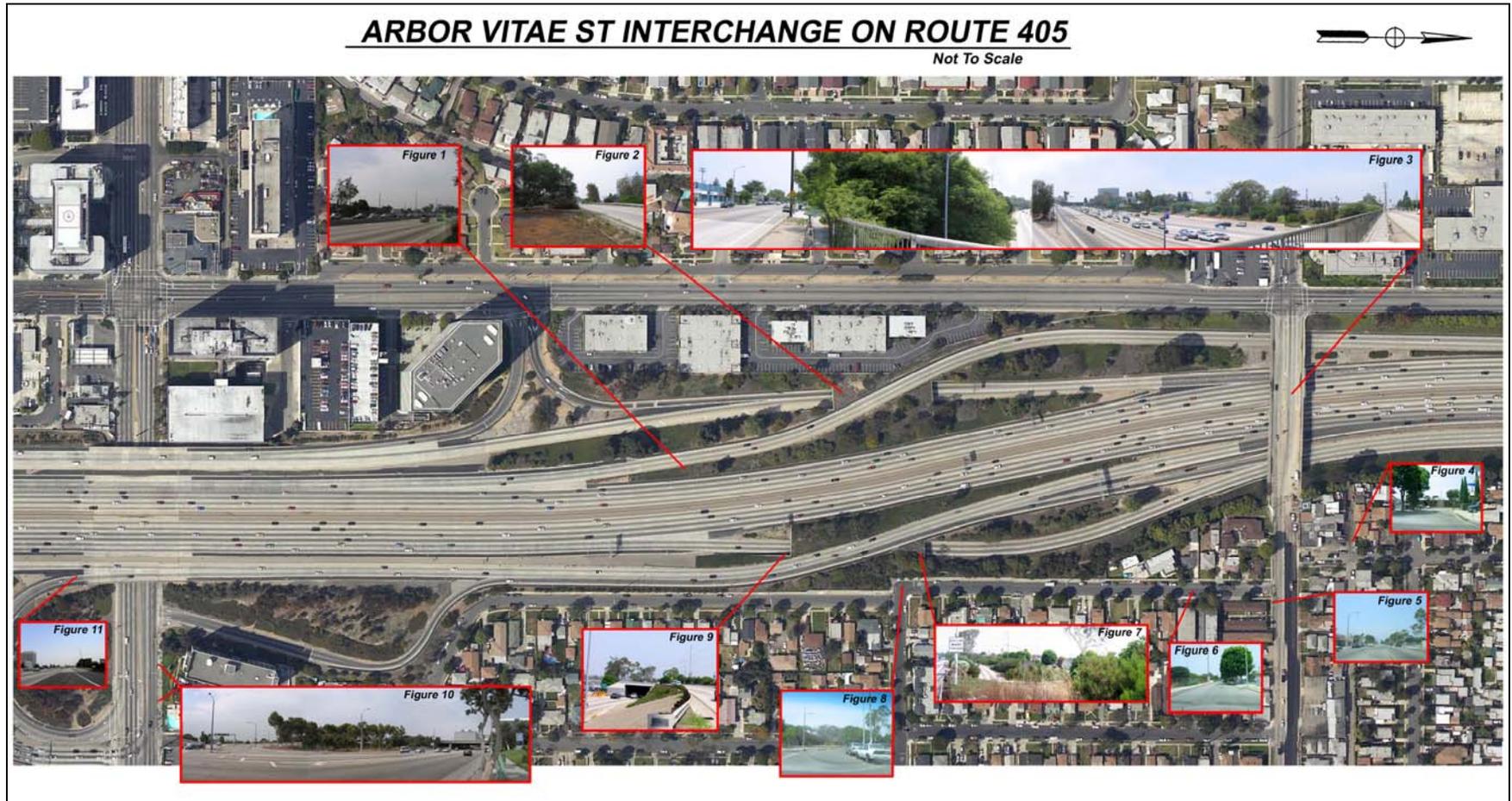
Open skies and vehicles dominate the southbound view of I-405 from Manchester Avenue onramp. Trees will be cut down for the construction of the new sound wall on the west side of the freeway. An aesthetic treatment to the wall and the vine planting and irrigation will be made possible by setting the wall back away from the existing lower barrier wall that extends to the limit of Caltrans right-of-way. Views for the southbound 405 travelers will be not impacted substantially due to the short viewing time of the new bridge. The new merge lane does not cause visual impact because of the existing 6 drive lanes in this location.

Southbound View of Interstate 405 from Industrial Park (9300 S La Cienega Blvd.) 2

See Viewpoint 2 of Figure 2-10 Eleven Identified Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405 on the following page.

Views for the southbound 405 travelers will be impacted due to the short viewing time of the new bridge. The new merge lane does not cause a significant visual impact because of the existing 6 drive lanes in this location.

Figure 2-10. Eleven Viewpoints of Study Arbor Vitae Street Interchange on I-405



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Figure 2-11. Photo of Existing View 12 on West Side of I-405



The sound wall impacts View 12 of I-405 from the intersection of Arbor Vitae Street and La Cienega Boulevard for adjacent businesses and residences. No roadway signs will be blocked by the new sound wall on the west side of I-405. Landscaping along the highway has been eliminated from this viewpoint, as is evident in Figure 2-11 above.

Figure 2-12. Photo Simulation of New Sound Wall on West Side of I-405 (Landscaping Added) View 12



In this photo simulation based on View 12, an aesthetic treatment to the wall and the vine and palm tree planting and irrigation will be made possible by setting the wall back away from the existing lower barrier wall that extends to the limit of Caltrans right-of-way. These measures will soften the appearance of the wall and deter graffiti as seen in Figure 2-12. The homeowners and businesses are unable to view the existing freeway and the new south half interchange structure.

VIEWPOINT 2

Figure 2-13. Photo Simulation of Elevated Arbor Vitae Street Onramp to Southbound I-405



View from Arbor Vitae Street facing South

Views for the southbound 405 travelers will be impacted due to the short viewing time of the new bridge. The new merge lane does not cause a significant visual impact because of the existing 6 drive lanes in this location.

Southbound View of Interstate 405 from Arbor Vitae Overcrossing 3

See Viewpoint 3 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

Views for the southbound 405 travelers will not be impacted substantially due to the short viewing time of the new bridge. The new merge lane does not cause a significant visual impact because of the existing 6 drive lanes in this location. Viewpoints for the northbound I-405 travelers will not be substantially impacted by an added bridge structure because an overcrossing already exists in the area. The viewpoint will be impacted only marginally by the replacement of the Northbound Manchester Avenue tunnel or the construction of a new bridge.

VIEWPOINT 3

Figure 2-14. Photo View 13 of Widened Arbor Vitae Street Overcrossing



The widened Arbor Vitae Street Overcrossing will not have a significant visual impact on travelers along the Arbor Vitae Street, La Cienega Boulevard, and Ash Avenue. It is a built-out area where no park or natural areas will be visually impacted. Treatments to make the color of the overcrossing blend in with the current surroundings will be done upon the completion of its construction. Roadway signs and sightlines will not be affected by the widened Arbor Vitae Street Overcrossing of this proposed project.

VIEWPOINT 4

Figure 2-15. Photo Simulation of New Sound Wall on East Side of I-405 (No Landscaping Added)



In these simulations, the new sound wall on the east side of Interstate 405 in Inglewood next to Ash Street and Golden Gate Avenue has been added to the existing key viewpoint (facing southwest from Golden Gate Avenue). Landscaping along the highway has been eliminated from this viewpoint, as is evident in Figure 2-15 above.

Figure 2-16. Photo Simulation of New Sound Wall on East Side of I-405 (Landscaping Added)



In this simulation, an aesthetic treatment to the wall and the palm tree planting and irrigation will be made possible by setting the wall back away from the existing lower barrier wall that extends to the limit of Caltrans right-of-way. These measures will soften the appearance of the wall and deter graffiti as seen in Figure 2-16 above. Viewpoints for the existing homeowners and businesses adjacent to the freeway will not be impacted. Because of their location, the homeowners and businesses are unable to view the existing freeway and the new south half interchange structure.

View of Interstate 405 from intersection of Ash and Buckthorn Streets 4

See Viewpoint 4 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

Because of an existing sound wall and mature trees, viewpoints for the existing homeowners and businesses adjacent to the freeway will not be impacted. Due to their location, the homeowners and businesses are unable to view the existing freeway and new structure.

View of Arbor Vitae Street Overcrossing from intersection of Arbor Vitae and Ash Streets 5

See Viewpoint 5 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

The built urban environment along Arbor Vitae Street includes a wide arterial street and some trees. Again, viewpoints for the existing homeowners and businesses adjacent to the freeway will not be impacted. Due to their location, the homeowners and businesses are unable to view the existing freeway and new structure.

View of Arbor Vitae Street from Ash Street Facing North 6

See Viewpoint 6 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

Within the built urban environment, Ash Street has some bushes and trees within this viewpoint. The homeowners and businesses are not able to view the existing freeway and new structure. The viewpoints for the existing homeowners and businesses adjacent to the freeway will not be impacted.

View of Interstate 405 from 95th Street and Ocean Gate Avenue Intersection 8

See Viewpoint 8 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

This viewpoint from the residential neighborhood includes many trees as well as light poles and other built infrastructure. Again, viewpoints for the existing homeowners and businesses adjacent to the freeway will not be impacted. Because of their location, the homeowners and businesses are unable to view the existing freeway and the new south half interchange structure.

VIEWPOINT 5

View of Northbound 405 and Connectors from Manchester Avenue Tunnel 7

See Viewpoint 7 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

There is a lot of shrub and brush vegetation in this viewpoint. Viewpoints for the northbound I-405 travelers will not be substantially impacted by an added bridge structure because an overcrossing already exists in the area. The viewpoint will be impacted only marginally by the replacement of the Northbound Manchester Avenue tunnel or the construction of a new bridge.

View of Manchester Avenue Tunnel from Manchester Avenue Off-ramp 9

See Viewpoint 9 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

The viewpoint illustrates existing highway infrastructure with gravel and ground vegetation. Replacing the northbound Manchester Avenue tunnel or building a new bridge will not substantially impact the view of motorists traveling along I-405. Viewpoints for the northbound I-405 travelers will not be substantially impacted by an added bridge structure because an overcrossing already exists in the area.

Figure 2-17. Photo Simulation of Elevated Northbound I-405 Off-ramp to Arbor Vitae Street



The sound wall impacts the limited view of I-405 from the intersection of Arbor Vitae Street and La Cienega Boulevard for adjacent businesses and residences. No roadway signs will be blocked by the new sound wall on the west side of I-405. Plants and shrubs have been added to this view to minimize the visual impact of the sound wall. This is made possible by setting the wall back away from the existing lower barrier wall that extends to the limit of Caltrans right-of-way. These measures will soften the appearance of the wall and deter graffiti as seen in Figure 2-16. The homeowners and businesses are unable to view the existing freeway and the new south half interchange structure.

VIEWPOINT 6

View of Century Boulevard east of Interstate 405 10

See Viewpoint 10 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

The views of Century Boulevard westbound and eastbound travelers will not be substantially impacted by the widened Arbor Vitae Street onramp. The built-out area will not change substantially as a result of this project nor will the tree grove be impacted.

View of Northbound 405 from Century Boulevard Onramp 11

See Viewpoint 11 of Figure 2-10 Eleven Viewpoints of Study Arbor Vitae Street Interchange on Interstate 405.

Again, the views of Century Boulevard westbound and eastbound travelers will not be substantially impacted by the widened Arbor Vitae Street onramp. Viewpoints for the northbound I-405 travelers will not be substantially impacted by an added bridge structure because the Arbor Vitae Street overcrossing already exists in the area.

Avoidance, Minimization, and/or Mitigation Measures

Visual mitigation for adverse project impacts addressed in the visual assessments and summarized in the VIA will consist of adherence to the following design requirements in cooperation with the District Landscape Architect. All visual mitigation will be designed and implemented with the concurrence of the District Landscape Architect. Caltrans and the FHWA mandate that a qualitative/aesthetic approach should be taken to mitigate for visual quality loss in the project area. The following measures have been specified to minimize impacts for Alternative 2:

- Landscape to screen the existing structures and provide landscape enhancement.
- Add structural aesthetics to the new connector and retaining wall.
- Plant additional trees where feasible to provide screening for the adjacent residents.
- Plant vines along retaining wall where applicable to visually soften these structures.
- Identify key views for visual assessment
- Preserve as much as possible existing landscape within the state right of way.
- Provide freeway landscaping that is consistent with local policies.
- Use highway planting that is appropriately scaled and oriented to the freeway viewer.
- Select highway planting based on maximum benefit for the long-term costs involved. Plant materials that can withstand the difficult roadside conditions and survive with limited irrigation and minimal maintenance should be included. Invasive species shall not be used.
- Where a sound wall is proposed adjacent to South Ocean Gate Avenue and Ash Avenue, not only provide aesthetic treatment to the wall, but also set back wall away from the right-of-way to allow vine planting and irrigation to be placed as to soften the appearance of the wall and deter graffiti.

2.1.8 CULTURAL RESOURCES

Regulatory Setting. “Cultural Resources,” as used in this document, refers to all historical and archeological resources, regardless, of significance. Laws and regulations dealing with cultural resources include:

The National Historical Preservation Act (NHPA) of 1966, as amended, established national policy and procedures regarding historic properties, defined as district, sites, buildings, structures, and objects included in or eligible for the National Register of Historic Places. Section 106 of NHPA requires federal agencies to take into account the effects of their undertakings on such properties and to allow the regulations issued by the Advisory Council on Historic Preservation (36 CFR 800). On January 1, 2004, a Section 106 Programmatic Agreement (PA) between the Advisory Council, FHWA, State Historic Preservation Officer (SHPO), and Caltrans went into effect for Caltrans as part of the Surface Transportation Project Delivery Pilot Program (23 CFR 773) (July 1, 2007).

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 cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission (NAHC) who will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains will contact Gary Iverson 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.

Historic properties may also be covered under Section 4(f) of the U.S. Department of Transportation Act, which regulates the “use” of land from historic properties.

Affected Environment

Area of Potential Effects (APE). The Area of Potential Effects (APE) for the project that includes parcels that could be affected by right of way acquisition, audible effects, or visual effects resulting from implementation of the proposed project. The limits of the APE run roughly along Interstate 405 from the West Century Boulevard Undercrossing (Bridge No. 53-1522s) to the South Arbor Vitae Street Overcrossing (Bridge No. 53-1244) and 20 parcels fronting both Ash Avenue and Arbor Vitae Street east of Interstate 405 in Inglewood, California.

The results of an extensive records search of Caltrans District 7 files, the South Central Coastal Information Center at University of California, Los Angeles, the City of Inglewood Building Records and Planning Files and other reference sources has revealed that there are no recorded archaeological resources within the Area of Potential Effect (APE). A field inspection was conducted to confirm this finding. Based on this, no archeological impacts are anticipated, and no further archeological investigations are warranted at this time. An archeological survey was completed on July 23, 1999, and confirmed by more recent studies.

Historic Properties. A Historic Property Survey Report (HPSR) for the I-405/Arbor Vitae Street Interchange Project was completed on October 6, 1999. On December 1, 1999, the State Historic Preservation Officer (SHPO) concurred with the findings in the HPSR. This concurrence is cited in this document’s EA References Section. No historic properties eligible for the National Register of Historic Places (NRHP) were identified in the Area of Potential Effect (APE).

Finding of Effect. A Finding of Effect Report (FOE) for the Interstate 405 at Arbor Vitae Street New South Half Interchange Project determined that the project will have a finding of “No Historic Properties Effected” pursuant to 23 U.S.C. 327, as provided in the Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and Caltrans 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, Stipulation X. C. No consultation will be conducted with SHPO regarding the resolution of adverse effects, pursuant to Section 106 PA, Stipulation XI, 36 CFR 800.6(a), and 800.6(b)(1). As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Cultural Resources Impacts.

Impacts

Alternative 1 (No-Build Alternative): Alternative 1 would result in no construction of a New South Half Interchange at Arbor Vitae Street along Interstate 405. The Arbor Vitae Street Overcrossing would remain as it is. This alternative would have a **finding of no impact** on any historic property.

Alternative 2 (Build Alternative): A New South Half Interchange at Arbor Vitae Street with a new onramp from Arbor Vitae Street to southbound I-405 will be constructed as well as a new off-ramp to Arbor Vitae Street from northbound I-405. The Arbor Vitae Street Bridge would be widened

from 6 to 8 lanes. An Arbor Vitae Street off-ramp from northbound I-405 and a southbound Arbor Vitae Street onramp to I-405 will be constructed for the new south half interchange. To provide room for the new Arbor Vitae Street off-ramp, the Century Boulevard crossover lane to northbound I-405 will be reconstructed. Caltrans has determined that the undertaking will have a **finding of no impact** on any historic property.

Avoidance, Minimization and/or Mitigation Measures

Neither alternative (No-Build Alternative 1 and the Arbor Vitae New South Half Interchange Alternative 2) will result in an Adverse Effect that will require minimization or mitigation measures. Thus, no proposal for such measures nor consultation with the State Historic Preservation Officer will be necessary for this project.

2.2 PHYSICAL ENVIRONMENT

2.2.1 HYDROLOGY AND FLOODPLAIN

Regulatory Setting. Executive Order 11988 (Floodplain Management) directs all federal agencies to refrain from conducting, supporting, or allowing actions in floodplains unless it is the only practicable alternative. The Federal Highway Administration requirements for compliance are outlined in 23 CFR 650 Subpart A.

In order to comply, the following must be analyzed:

- The practicability of alternatives to any longitudinal encroachments
- Risks of the action
- Impacts on natural and beneficial floodplain values
- Support of incompatible floodplain development
- Measures to minimize floodplain impacts and to preserve/restore any beneficial floodplain values impacted by the project.

The base floodplain is defined as “the area subject to flooding by the flood or tide having a one percent chance of being exceeded in any given year.” An encroachment is defined as “an action within the limits of the base floodplain.”

Hydraulic information for a project is provided in the Location Hydraulic Study, Summary Floodplain Encroachment Report and/or a Floodplain Evaluation Report. A Location Hydraulic Study (LHS) is prepared by a registered engineer who has expertise in hydraulics. If, based on the results of the LHS, either: 1) a significant encroachment on a floodplain, 2) an inconsistency with existing watershed and floodplain management programs or 3) uncertainty exists as to what impacts will occur, then a Floodplain Evaluation Report must be prepared. If no encroachment or impacts to the floodplain will occur, then a Summary Floodplain Encroachment Report will be prepared. For this project, a Summary Floodplain Encroachment Report was prepared since the one (1) proposed project build-alternative requires construction of a new south half interchange consisting of a northbound onramp and southbound off-ramp structure. The area of the project (FEMA boundary map of unmapped area 065036, panel # 0910, and suffix #9) has been categorized as low to moderate risk to the flood hazard. The proposed project's Location Hydraulics Study Floodplain Evaluation Report was completed on September 17, 1998.

Affected Environment

Located in Los Angeles County within the City of Inglewood, the Arbor Vitae New South Half Interchange Project does not include any water bodies, wetlands or sensitive natural areas within its project limits. The Pacific Ocean is nearly four miles to the west and thirteen miles to the south. The Los Angeles River is over seven miles to the East. Caltrans prepared a Location Hydraulic Study (LHS) for this project as required under Federal Highway Administration

requirements as outlined in 23 CFR 650 Subpart A. The Location Hydraulic Study (LHS) was completed on September 15, 1998. The ensuing discussion is based on those technical studies as prepared by a registered engineer with hydraulics expertise.

The Federal Flood Insurance Rate Maps within the project area are within Los Angeles County (Community Panel No. 060137 0090C & 065043 0920B). These portions of the proposed project are located inside of the 100-year flood zone. Therefore a Location Hydraulics Study was completed and is incorporated by reference. There is no watershed within the Project Limits. No 100-year flood zone backwater damages will occur to residences, other buildings, and crops. The project area has been categorized as low to moderate risk in terms of flood hazards.

Potential Impacts

The project's Location Hydraulics Study revealed that the proposed project will not introduce incompatible floodplain development nor will there be any significant impacts on natural and beneficial floodplain uses and values. Floodplain risks associated with implementation of this project are not significant. Therefore, a Summary Floodplain Encroachment Report was prepared. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Hydrology/Floodplain Impacts.

Impacts to the Floodplain from Alternative 2 (Build). The hydraulics/floodplain risks associated with the proposed project are low. No watershed exists within the project limits and the I-405/Arbor Vitae Street New South Half Interchange Project does not contain a longitudinal encroachment or a significant encroachment of any kind.

An increase in the base floodplain elevation (BFE) is not a proposed component of this project. Furthermore, a "significant encroachment" as defined at 23 CFR 650.105 is a highway encroachment and any direct support of likely base floodplain development that would involve one or more of the following construction or flood related impacts:

- A significant potential for interruption or termination of a transportation facility that is needed for emergency vehicles or provides a community's only evacuation route
- A significant risk (to life or property), or
- A significant adverse impact on natural and beneficial floodplain values

The purpose of this EA, as well as its component Floodplain Evaluation Report and Hydraulic Studies, is to identify the associated risks introduced by the proposed project, as well as their level of significance.

The one (1) proposed but rejected project build alternative, Alternative 2, called for construction of a new Arbor Vitae Street New South Half Interchange from Arbor Vitae Street to Century Boulevard, in the City of Inglewood, Los Angeles County. Neither Alternative 1 nor Alternative 2 would encroach substantially into a floodplain nor support likely floodplain development.

No impacts or encroachments to the Floodplain, its beneficial values, nor additional risks related to hydrology will result from the No-Build Alternative (1).

Other impacts. In addition, Alternatives 1 and 2 of the proposed project are not going to adversely impact beneficial floodplain values.

Coordination regarding impacts to the Floodplain and Hydrology. The hydrology/floodplain risk of the I-405/Arbor Vitae Street New South Half Interchange Project is low. Also, the project does not contain a significant encroachment onto the floodplain or impact natural and beneficial floodplain values. Coordination on hydraulics/floodplain issues are not anticipated to be

conducted with either the U. S. Army Corps of Engineers or the Federal Emergency Management Agency.

Coordination, consultation, and presentation of the aforementioned Floodplain Evaluation Report was presented to the Federal Emergency Management Agency during circulation of the Draft EA/IS as sometimes an encroachment on a regulatory floodway, or an increase in the base flood elevation, or any subsequent actions may necessitate the need for a floodplain map revision.

Lastly, Executive Order 11988 requires that when a floodplain risk assessment, such as a Summary Floodplain Encroachment Report, is prepared, the public must be given the opportunity for early review and comment. It also requires that the risk assessment be filed with the State Clearinghouse. A reference to encroachments on the base floodplain must be included in public notices and any encroachments must be identified at public hearings. Caltrans executed this procedure jointly in the public notices and public hearings for the draft NEPA document.

Significance of Encroachment. A “significant encroachment” on a floodplain is defined at 23 CFR 650.105 as a highway encroachment and any direct support of likely base floodplain development that would involve one or more of the following construction or flood related impacts:

- a significant potential for interruption or termination of a transportation facility that is needed for emergency vehicles or provides a community's only evacuation route
- a significant risk (to life or property), or
- a significant or adverse impact on natural and beneficial floodplain values

The purpose of this EA, as well as its component Floodplain Evaluation Report and Hydraulic Studies is to identify the associated risks introduced by the proposed project, as well as their level of significance. There is no potential for significant interruption or termination of transportation facilities that are needed for emergency vehicles or community evacuation routes. The LHS indicates an estimated duration of traffic interruption for a 100-year flood at zero (0) hours at a “moderate” risk level. The LHS also indicates that there is a “low” risk to life and/or property as a result of construction and encroachment on the floodplain, with estimated roadway and property value damage costs of zero (0) dollars. Lastly, the study concludes that there is no potential for significant or adverse impacts to residences, other buildings, crops, and natural and beneficial floodplain values.

Avoidance, Minimization and/or Mitigation Measures

Caltrans has made one (1) minimization proposal with the goal of eliminating the aforementioned risks:

- Encroachment that is longitudinal and/or significant.
- Incompatible floodplain development
- Impacts on incompatible floodplain development

Minimization measures. Routine construction procedures for special mitigation measures to minimize floodplain impacts and to restore and preserve the natural and beneficial floodplain values will be a part of the final design to the extent practicable.

Conclusion. The purpose of this discussion is to note that the I-405/Arbor Vitae New South Half Interchange Project will not support incompatible floodplain development nor will there be any significant impacts on natural and beneficial floodplain uses and values. Again, floodplain risks associated with this project are not significant. The project will not lead to a significant potential for interruption or termination of a transportation facility that is needed for emergency vehicles or provides a community's only evacuation route. Construction of the new south half interchange will not put property or life at risk. The project has undergone the Project Review (PR) phase, and the preferred alternative, No-Build Alternative 1, has been identified. Please note that the project data

presented in this report are just preliminary estimates. No-Build Alternative 1 will not result in any impact to the flood plain.

2.2.2 WATER QUALITY AND STORM WATER RUNOFF

Regulatory Setting. Section 401 of the Clean Water Act requires water quality certification from the State Water Resource Control Board (SWRCB) or the Los Angeles Regional Water Quality Control Board (RWQCB), Region 4 when the project requires a Federal permit. Typically this means a Clean Water Act Section 404 permit to discharge dredge or fill into a water of the United States, or a permit from the Coast Guard to construct a bridge or causeway over a navigable water of the United States under the Rivers and Harbors Act.

Along with Clean Water Act Section 401, Section 402 establishes the National Pollutant Discharge Elimination System (NPDES) for the discharge of any pollutant into waters of the United States. The federal Environmental Protection Agency has delegated administration of the NPDES program to the SWRCB and the nine RWQCBs. To ensure compliance with Section 402, the SWRCB has developed and issued the Department an NPDES Statewide Storm Water Permit to regulate storm water and non-storm water discharges from the Department's right-of-way, properties and facilities. This same permit also allows storm water and non-storm water discharges into waters of the State pursuant to the Porter-Cologne Water Quality Act.

Non-departmental construction projects (encroachments) are permitted and regulated by the SWRCB's Statewide Construction General Permit. All construction projects exceeding one acre or more of disturbed soil require a Storm Water Pollution Prevention Plan (SWPPP) to be prepared and implemented during construction. The SWPPP, which identifies construction activities that may cause discharges of pollutants or waste into waters of the United States or waters of the State, as well as measures to control these pollutants, is prepared by the construction contractor and is subject to Department review and approval.

Finally, the SWRCB and the RWQCBs have jurisdiction to enforce the Porter-Cologne Act to protect groundwater quality. Groundwater is not regulated by Federal law, but is regulated under the state's Porter-Cologne Act. Some projects may involve placement or replacement of On-site treatment systems (OWTS) such as leach fields or septic systems or propose implementation of infiltration or detention treatment systems which may pose a threat to groundwater quality. Currently the OWTS program is without SWRCB regulation but you should be aware of threats to groundwater quality on the project site and evaluate and address accordingly in the environmental document. Design standards for installation and operation of infiltration and detention treatment systems should protect groundwater quality and those protections should also be addressed in the environmental document.

Affected Environment

The Arbor Vitae New South Half Interchange Project is located within the Ballona Creek Watershed and Dominguez Channel in the northwestern corner of the Los Angeles Basin. Robert Wu concurred with this finding. The Ballona Creek Watershed is a 130-square mile watershed that encompasses most of the City of Los Angeles west of downtown, the cities of Beverly Hills, Culver City, West Hollywood and portions of the cities of Inglewood and Santa Monica. The Pacific Ocean is nearly four miles to the west and thirteen miles to the south. The Los Angeles River is over seven miles to the East.

The Ballona Creek Watershed and Dominguez Channel Watershed are highly urbanized with commercial, residential, or industrial land uses. The project is located in the Santa Monica Bay Hydrologic Unit and within the Wilshire Hydrologic sub-area. Within the Dominguez Channel Watershed, the project is located in the Dominguez Channel Hydrologic Unit and with an undesignated hydrologic sub-area.

Potential Impacts

If the Proposed Build Alternative 2 had been pursued, the water body quality and storm water runoff risks associated with the proposed project are low. Two water bodies exist within the project limits and the I-405/Arbor Vitae Street New South Half Interchange Project does contain receiving water. However, the proposed project's disturbed soil area is larger than 1 acre, and therefore, will require a SWPPP pursuant to the Clean Water Act (Section 402).

Pursuant to the Clean Water Act (Sections 401 and 404), and potentially at the State level pursuant to Fish and Game Code 1602, Caltrans may need to obtain a Water Quality Certification from the Regional Water Quality Control Board, an Individual or Nationwide Permit from the U.S. Army Corps of Engineers, and a Streambed Alteration Agreement from the California Department of Fish and Game, respectively. This shall occur during the next phase of the project: the Project Specifications and Estimates (PS&E) phase. This NEPA document shall be submitted during the application process.

The increase in the number of impervious areas nor greater downstream effects due to increase in water flow due to this project will not be increased substantially. There could be an unsubstantial effect on water quality. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Water Quality/Storm Water Runoff Impacts.

Avoidance, Minimization and/or Mitigation Measures

Pursuant to the Clean Water Act (Section 402), Caltrans has obtained from the SWRCB a NPDES permit (No. CAS 000003) that regulates storm water discharges from Caltrans facilities. This project must comply with NPDES Construction General Permit No. CAS000002 if disturbed soil is greater than (1) acre, in which the project fulfills. The permit requires Caltrans to maintain and implement an effective Storm Water Management Plan (SWMP) that identifies and describes the Best Management Practices (BMPs) used to reduce and eliminate the storm water runoff discharge of pollutants to waters of drainage conveyances and water bodies to improve water quality. The SWMP is the framework for developing and implementing guidance to meet permit requirements for Caltrans' storm water discharges. Disturbed areas will be minimized. The Avoidance, Minimization and/or mitigation measures were proposed for Proposed but Rejected Alternative 2. Since no impacts will result from No-Build Alternative 1, no avoidance, minimization or mitigation measures are required,

Total Maximum Daily Load (TMDL) Requirements. A TMDL or Total Maximum Daily Load is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards, and an allocation of that amount to the pollutant's sources. The California Regional Water Quality Control Board devises water quality standards. They identify the uses for each waterbody, for example, drinking water supply, contact recreation (swimming), and aquatic life support (fishing), and the scientific criteria to support that use. A TMDL is the sum of the allowable loads of a single pollutant from all contributing point and nonpoint sources. The calculation must include a margin of safety to ensure that the waterbody can be used for the purposes the State has identified. The calculation must also include a margin of safety to ensure that the water body can be used for the purposes the State has identified. The calculation must also account for seasonal variation in water quality. The Clean Water Act, Section 303, establishes the water quality standards and TMDL programs.

Best Management Practices (BMPs). With respect to storm water quality, avoidance and minimization are accomplished by implementation of approved BMPs, which are generally broken down into four categories: Design Pollution Prevention, Treatment, Construction, and Maintenance BMPs. Certain projects may require installation and maintenance of permanent controls to treat storm water. Selection and design of permanent project BMPs is primarily refined in the next phase of the project: the Project Specifications and Estimates (PS&E) phase.

During construction activities, Caltrans has a comprehensive program for preventing water pollution via the preparation and implementation of the aforementioned SWPPP and WPCP. Caltrans has also developed and obtained the SWRCB approval of numerous BMPs for preventing water pollution during construction. Caltrans construction BMPs, SWPPP, and WPCP also incorporate the requirements of the SWRCB NPDES permit. This is all implemented jointly by Caltrans and the coordinator hired to construct the project prior to construction.

The following BMPs have been considered for use on this project, but are subject to change and revision.

Treatment BMPs

- Biofiltration Strips and Swales B-5
- Infiltration Devices B-11
- Detention Devices B-29
- Gross Solids Removal Devices
- Media Filters B-53
- Multi-Chamber Treatment Train (MCTT) B-65
- Wet Basin B-71

Construction Site BMPs

Soil Stabilization BMPs C-5

- Geotextiles, Mats/Plastic Covers and Erosion Control Blankets (SS-7) C-12

Sediment Control Practices C-18

- Silt Fence (SC-1) C-18
- Fiber Rolls (SC-5) C-19
- Gravel Bag Berm (SC-6) C-20
- Street Sweeping and Vacuuming (SC-7) C-20
- Storm Drain Inlet Protection (SC-10) C-21

Tracking Control Practices C-21

- Stabilized Construction Entrance (TC-1) C-21
- Stabilized Construction Roadway (TC-2) C-21

Waste Management and Material Pollution Control C-25

- Stockpile Management (WM-3) C-26
- Concrete Waste Management (WM-8) C-27

Non-Stormwater Management BMP

- Vehicle and Equipment Cleaning NS-8
- Vehicle and Equipment Fueling NS-9
- Vehicle and Equipment Maintenance NS-10

Other BMP Measures

- Collect concentrated flows in stabilized drains, channels, etc.
- Utilize dikes, curbs, gutters, etc. for concentrated flow conveyance
- Utilize peak flow attenuation devices, if applicable

- Construct new drainage facilities, as applicable
- Utilize channel erosion control measures, linings, as applicable

2.2.3 GEOLOGY/SOILS/SEISMIC/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.”

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. Caltrans’ Office of Earthquake Engineering is responsible for assessing the seismic hazard for Department projects. The current policy is to use the anticipated Maximum Credible Earthquake (MCE), from young faults in and near California. The MCE is defined as the largest earthquake that can be expected to occur on a fault over a particular period of time.

A Preliminary Geotechnical Report (PGR) has been prepared by Caltrans for the proposed build alternative, which includes information in regard to site reconnaissance, a literature search, and a review of the Log of Test Boring (LOTB), based on typical cross-sections and preliminary layouts as provided by the district. The following information has been extracted from the PGR completed July 1997 and the September 2, 2008 Memorandum Regarding Seismicity from Gustavo Ortega, Branch Chief of Special Geological Studies, Office of Geotechnical Design South.

Affected Environment

Geology. Based on the Geologic Map of California by the Division of Mines and Geology (State of California 1997), the proposed site is mainly underlain by quaternary alluvial sediment. The deposits consist of interbedded slightly compact to compact sandy silt, silty sand, and silt and sand. A bed of sand about 10 feet thick was encountered approximately below elevation 68 feet. Structurally, the site is located just south of the Baldwin Hills which are described as a gently arched dome, slightly elongated in a northwesterly direction. The rocks and sediments that make up the terrain of the Baldwin Hills are very young.

According to the previous LOTB performed in the past fifty years, ground water fluctuates between the approximate elevations of 53 feet and 61 feet, which is approximately 42-50 feet deep below the ground surface. Ground water at the site was encountered at a depth of 42 feet, elevation of 53.3 feet during a 1959 geotechnical investigation. No surface water was observed in the area, but some perched water may exist temporarily due to frequent surface run-off. The construction of this project will not have an effect on ground water.

Topography. As said above, the Project Study Area is formed by quaternary alluvial sediment and terrace deposits and is generally flat. According to our topographic layout plan, ground surface elevation varies from approximately 53 feet to approximately 68 feet. There are no known natural resources that will be affected by this project.

Seismicity. Maximum Credible Earthquake (MCE) is typically defined as the maximum earthquake predicted to affect a given location based on the known lengths of the active faults in the vicinity. Based on several memorandums prepared by Caltrans Geotechnical Services, and Caltrans’ 2007 draft Los Angeles Area Seismic Hazard Map, the Maximum Credible Earthquake (MCE) along the Newport-Inglewood Fault System, located approximately 0.8 miles northeast of the project, is 7.0 Magnitude (M_w).

Also, using the 2007 draft Los Angeles Area Seismic Hazard Map, the Maximum Credible Earthquake (MCE) along the Charnock Fault, located approximately 0.5 miles southwest of the project site, is 6.5 M_w .

Liquefaction. Liquefaction has not been documented within the limits of this project during the last two major earthquakes in Southern California (1971 San Fernando - $M_M = 6.62$ and the 1994 Northridge - $M_M = 6.7$). In addition, based on a regional study conducted by the U.S. Geological Survey (1985), the relative liquefaction susceptibility along this project is considered to be very low.

Potential Impacts

Potential for Impacts related to project's susceptibility to erosion and geologic hazards such as earthquakes and liquefaction. Based on several memorandums prepared by Caltrans Geotechnical Services, and Caltrans' 2007 draft Los Angeles Area Seismic Hazard Map, the Maximum Credible Earthquake (MCE) along the Newport-Inglewood Fault System is 7.0 and along the Charnock Fault is 6.5. There will be an insubstantial increase in the existing rate of soil erosion as a result of this project due to grading and after the new fill slopes have been filled or hydroseeded. The increase in the number of impervious areas nor greater downstream effects due to increase in water flow due to this project will not be increased substantially.

Potential for Exposure of Workers to Hazards During Construction. There are currently no special considerations of provisions recommended as a result of this project and geologic conditions in the area. Workers, nonetheless, are subject to implementation and practice of general safety precautions within construction zones.

Potential for Impacts to Natural Geologic Landmarks and Landforms. As part of the scoping and environmental analysis conducted for the project, potential impacts to natural geologic landmarks and landforms were considered, but no adverse impacts were identified. Consequently, there is no further discussion regarding these issues in this section.

As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Geology/Seismic/Topography Impacts.

Avoidance, Minimization and/or Mitigation Measures

Impacts of a geotechnical nature are negligible and no mitigation measures other than standard engineering design and practices are recommended. No significant settlement is expected to occur in the proposed fill foundations for the realigned ramps. No unusual treatment or special construction methods will be required. There are no known natural resources that will be affected by this project. Preservation of existing vegetation (reduce clearing and grubbing, minimize disturbed areas to the extent possible) will be conducted. If applicable to this project, flatter slopes, slope rounding, benches, and terraces for slopes and hard surfaces along the ground will be utilized. Channel erosion control measures, paved/lined drainage devices and facilities, and vegetated surfaces and other planting strategies will be considered. No avoidance, minimization and/or mitigation measures are proposed for No-Build Alternative 1 since there will be no impacts on these resources.

2.2.4 PALEONTOLOGY

Regulatory Setting. Paleontology is the study of life in past geologic time based on fossil plants and animals. A number of federal statutes specifically address paleontological resources, their treatments, and funding for mitigation as part of federally authorized or funded projects (e.g. Antiquities Act of 1906 [16 USC 431-433], Federal-Aid Highway Act of 1935 [20 USC 78]). Under California law, paleontological resources are protected by the California Administrative Code, Title 14, Section 4306 et seq., and Public Resources Code Section 5097.5.

Affected Environment

Caltrans Division of Environmental Planning, District 7, Paleontological Coordinator, reviewed supporting documentation about this project to determine if it required additional analysis and documentation/studies during the Project Approval/Environmental Document Phase. The Paleontological Coordinator also initiated consultation with the former Associate Environmental Planner of this project; he noted that paleontology was not an issue on this project. The determination was based on the PEAR that was performed during the initial stages of this project's development. Additionally, the scope of work has not changed dramatically. Therefore, a new paleontological investigation will not be necessary at this time. Paleontological resources are not anticipated to be encountered in the project area. The Area of Potential Affect does not contain a Section 4(f) resource, a National Landmark, lands administered by the Bureau of Land Management, National Park Service, Army Corps of Engineers, or Department of Parks and Recreation resources. However, if during project construction, paleontological resources are encountered, work in the affected area shall immediately halt until a qualified paleontologist is notified and examines the find. Construction may only resume in the affected area once a paleontologist has cleared it. The District 7 Paleontological Coordinator needs to be notified of any scope of work changes so that the determination of no issue with paleontology can be revisited. This will not be an issue since the No-Build Alternative 1 has been identified as the Preferred Alternative.

In addition, a Preliminary Geotechnical Report (PGR) has been prepared by Caltrans for the proposed build alternative, which includes information in regard to site reconnaissance, and a literature search. The following information has been extracted from the PGR completed July 1997 and the September 2, 2008 Memorandum Regarding Seismicity from Gustavo Ortega, Branch Chief of Special Geological Studies, Office of Geotechnical Design South. The proposed site is mainly underlain by quaternary alluvial sediment. This sediment is not of concern for this project.

Potential Impacts

As stated previously, paleontological resources are not anticipated to be encountered in the project area. No sensitive formations, such as the Monterey Formation, are unlikely to be encountered during construction. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Paleontology Impacts.

Avoidance, Mitigation, and/or Minimization Measures

Because it is unlikely that significant paleontological resources will be encountered during construction of the project, no formal mitigation and monitoring plan is necessary. However, if paleontological resources are discovered during construction, the paleontologist (or paleontological monitor) will recover them. Construction work in these areas will be halted or diverted to allow recovery of fossil remains in a timely manner. Fossil remains collected during the monitoring and salvage portion of the mitigation program will be cleaned, prepared, sorted, and cataloged. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, will then be deposited in a scientific institution with paleontological collections. No avoidance, minimization and/or mitigation measures are proposed for No-Build Alternative 1 since there will be no impacts on these resources.

2.2.5 HAZARDOUS WASTE/MATERIALS

Regulatory Setting Hazardous materials and hazardous wastes are regulated by many state and federal laws. These include not only specific statutes governing hazardous waste, but also a variety of laws regulating air and water quality, human health and land use.

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

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Water Drinking 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 12088, Federal Compliance with Pollution Control, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

Hazardous waste in California is regulated primarily under the authority of the federal Resource Conservation and Recovery Act of 1976, and the California Health and Safety Code. Other California laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup and emergency planning.

Worker health and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous material is vital if it is disturbed during project construction.

Affected Environment

An Initial Site Assessment (ISA) was conducted (Caltrans Office of Environmental Engineering and Corridor Studies, October 1, 2008) for the build alternative to identify, to the extent practical, contaminated, and potentially contaminated areas and hazardous waste problems within and adjacent to Caltrans right of way and proposed project area. Sources of hazardous waste include the presence of active gas stations or shut down gas stations, automotive repair businesses, dry cleaning businesses, any industrial activity, car recyclers, landfills (permitted or unpermitted), and naturally occurring asbestos, which can be found in certain types of geologic formations. The ISA included a field reconnaissance of the subject area and adjoining properties, and a review of historical records, maps, aerial photographs, and regulatory databases.

Delineation of Study Area The ISA addressed the right of way located along I-405 from roughly Arbor Vitae Street to Century Boulevard, and right of way east of I-405, mainly residential structures, both single-family homes and apartments, with some mixed neighborhood retail buildings. No evidence of releases or environmental concerns are noted in the ISA on any of these parcels.

Groundwater Sampling. The Arbor Vitae New South Half Interchange Project does not include any water bodies, wetlands or sensitive natural areas within its project limits. Therefore, groundwater sampling and testing would not have been performed during the Planning, Specifications, and Estimates (PS&E) Phase to determine the level of contaminants.

Potential Impacts

As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Hazardous Waste/Materials Impacts.

Avoidance, Minimization, and/or Mitigation Measures

If Alternative 2 (Build Alternative) had been pursued identified as the Preferred Alternative, a more focused and in-depth approach to assessing the detrimental impacts during construction activities would be performed upon project approval. Further evaluation of these types of risks will include subsurface exploration, sampling, and/or other forms of testing to avoid, minimize, or mitigate any potential hazardous waste impacts.

2.2.6 AIR QUALITY

Regulatory Setting. The Clean Air Act as amended in 1990 is the federal law that governs air quality. Its counterpart in California is the California Clean Air Act (CCAA) of 1988. These laws set standards for the quantity of pollutants that can be in the air. At the federal level, these standards are called National Ambient Air Quality Standards (NAAQS). Standards have been established for six criteria pollutants that have been linked to potential health concerns; the criteria pollutants are: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), lead (Pb), and sulfur dioxide (SO₂).

Under the 1990 Clean Air Act Amendments, the U.S. Department of Transportation cannot fund, authorize, or approve Federal actions to support programs or projects that are not first found to conform to a State Implementation Plan for achieving the goals of the Clean Air Act requirements. Conformity with the Clean Air Act takes place on two levels – first, at the regional level and second, at the project level. The proposed project must conform at both levels to be approved. Regional level conformity in California is concerned with how well the region is meeting the standards set for carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), and particulate matter (PM). California is in attainment for the other criteria pollutants. At the regional level, Regional Transportation Plans (RTPs) are developed that include all of the transportation projects planned for a region over a period of years, usually at least 20 years. Based on the projects included in the RTP, an air quality model is run to determine whether or not the implementation of those projects would conform to emission budgets or other tests showing that attainment requirements of the Clean Air Act are met. If the conformity analysis is successful, the regional planning organization, such as the Southern California Association of Governments (SCAG) for Los Angeles County and five other Southern California Counties, and the appropriate federal agencies, such as the Federal Highway Administration, make the determination that the RTP is in conformity with the State Implementation Plan for achieving the goals of the Clean Air Act. Otherwise, the projects in the RTP must be modified until conformity is attained. If the design and scope of the proposed transportation project are the same as described in the RTP, then the proposed project is deemed to meet regional conformity requirements for purposes of the project-level analysis.

Conformity at the project-level also requires “hot-spot” analysis if an area is of “non-attainment” or of “maintenance” for carbon monoxide (CO) and/or particulate matter (PM). A region is a “non-attainment” area if one or more monitoring stations in the region fail to attain the relevant standard. Areas that were previously designated as non-attainment areas but have recently met the standard are called “maintenance” areas. “Hot-spot” analysis is essentially the same, for technical purposes, as CO or PM analysis performed for NEPA purposes. Conformity does include some specific standards for projects that require a hot-spot analysis. In general, projects must not cause the CO standard to be violated, and in “nonattainment” areas the project must not cause any increase in the number and severity of violations. 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. This project is projected to receive funding for the Plans,

Specifications, and Engineering (PS&E) and the Construction phases from the Los Angeles County Metropolitan Transportation Authority consisting of \$53.5 million. This is a large portion of the \$64 million in capital costs required for this project.

Affected Environment

The ensuing discussion is from the project's Air Quality Report dated September 30, 2008.

Local Regulatory Setting. The proposed project is located in the South Coast Air Basin (SCAB). SCAB is comprised of parts of Los Angeles, Riverside and San Bernardino counties and all of Orange County. The basin is bounded on the west by the Pacific Ocean and surrounded on the east, north, and south by mountains. To the north lie the San Gabriel Mountains, to the north and east the San Bernardino Mountains, to the southeast the San Jacinto Mountains and to the south the Santa Ana Mountains. The basin forms a low plain and the mountains channel and confine airflow in which air pollutants are trapped.

The primary agencies responsible for regulations to improve air quality in the SCAB are the South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB). The Southern California Association of Governments (SCAG) is an important partner to SCAQMD, as it is the designated metropolitan planning authority for the area and produces estimates of anticipated future growth and vehicular travel in the basin that are used for air quality planning. The SCAQMD sets and enforces regulations for non-vehicular sources of air pollution in the basin and works with SCAG to develop and implement Transportation Control Measures (TCM). TCM measures are intended to reduce and improve vehicular travel and associated pollutant emissions.

CARB was established in 1967 by the California Legislature to attain and maintain healthy air quality, conduct research into the causes and solutions to air pollution, and systematically attack the serious problem caused by motor vehicles, which are the major causes of air pollution in California. CARB sets and enforces emission standards for motor vehicles, fuels, and consumer products. The agency sets the health-based California Ambient Air Quality Standards (CAAQS) and monitors air quality levels throughout the state. The board identifies and sets control measures for toxic air contaminants. The board also performs air quality related research, provides compliance assistance for businesses, and produces education and outreach programs and materials. CARB provides assistance for local air quality districts such as SCAQMD.

The U.S. Environmental Protection Agency (U.S. EPA) is the primary federal agency for regulating air quality. The EPA implements the provisions of the Federal Clean Air Act (FCAA). This Act establishes national air quality standards (NAAQS) that are applicable nationwide. The EPA designates areas with pollutant concentrations that do not meet the NAAQS as non-attainment areas for each criteria pollutant. States are required by the FCAA to prepare State Implementation Plans (SIP) for designated non-attainment areas. The SIP is required to demonstrate how the areas will obtain the NAAQS after a non-attainment designation are redesignated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the NAAQS.

The California Clean Air Act required all air pollution control districts in the states to prepare a plan prior to December 31, 1994 to reduce pollutant concentrations exceeding the CAAQS and ultimately achieve the CAAQS. The districts are required to review and revise these plans every three years. The SCAQMD satisfies this requirement through the publication of an Air Quality Management Plan (AQMP). The AQMP is developed by SCAQMD and SCAG in coordination with local governments and the private sector. The AQMP is incorporated into the SIP by CARB to satisfy the FCAA requirements discussed above. Table 15 on the following page lists the current attainment designations for the SCAB. For the federal standards, the required attainment date is also shown. The unclassified documentation indicates that the air quality data for the area does not support a designation of attainment or non-attainment.

The following Table 15 shows that the EPA has designated SCAB as Severe-17 non-attainment for ozone, serious non-attainment for PM₁₀, non-attainment for PM_{2.5}, and attainment/maintenance for CO and NO₂. The basin has been designated by the state as non-attainment for ozone, PM₁₀, and PM_{2.5}. The federal designations of Severe-17 and Serious affect the required attainment dates as the federal regulations have different requirements for areas that exceed the standards by greater amounts at the time of attainment/non-attainment designation.

Table 15. Designations of Criteria Pollutants for the South Coast Air Basin

Pollutant	Federal	State
Ozone (O ₃)	Extreme Non-attainment (2021)	Non-attainment
Respirable Particulate Matter (PM ₁₀)	Serious Non-attainment (2006)	Non-attainment
Fine Particulate Matter (PM _{2.5})	Non-attainment (2015)	Non-attainment
Carbon Monoxide (CO)	Attainment/Maintenance (2000)	Attainment
Nitrogen Dioxide (NO ₂)	Attainment/Maintenance (1995)	Attainment
Sulfur Dioxide (SO ₂)	Attainment	Attainment
Lead	Attainment	Attainment
Visibility Reducing Particles	n/a	Unclassified
Sulfates	n/a	Unclassified
Hydrogen Sulfide	n/a	Attainment
Vinyl Chloride	n/a	Attainment

Notes:

1. The Federal 1-hour Ozone (O₃) standard was rescinded effective June 15, 2005 with the implementation of the 8-hour standard. Prior to this the South Coast Air Basin was designated Extreme Non-Attainment for the 1-hour O₃ standard with attainment of 2010.
2. U.S. Environmental Protection Agency changed the PM_{2.5} 24-hour standard from 65 to 35 µg/m³ with an effective date of December 2006. Until new area designations become effective in early 2010 based on the new standard, project-level conformity determinations become effective in early 2010 based on the new standard, project-level conformity determinations must still consider the 1997 PM_{2.5} standards because these are the standards upon which the current PM_{2.5} non-attainment designations are based.

The SCAB is designated as in attainment of the State and Federal SO₂ and lead as well as the state CO, NO₂, SO₂, lead, hydrogen sulfide, and vinyl chloride. In July 1997, EPA issued a new ozone NAAQS of 0.08 ppm using an 8-hour averaging time. Implementation of this standard was delayed by several lawsuits. Attainment/non-attainment designations for the new 8-hour ozone standard were issued on April 15, 2004 and became effective on June 15, 2005. The SCAB was designated severe-17 non-attainment, which requires attainment of the Federal Standard by June 15, 2021. As a part of the designation, the EPA announced that the 1-hour ozone standard would be revoked in June of 2005. Thus, the 8-hour ozone standard attainment deadline of 2021 supersedes and replaces the previous 1-hour ozone standard attainment deadline of 2010.

The SCAQMD is requesting that EPA change the non-attainment status of the 8-hour ozone standard to extreme. This will allow the use of undefined, or “black box,” reductions based on the anticipated development of new control technologies or improvements of existing technologies in the attainment plan. In addition, the extreme classification could extend the attainment date by three years to 2024.

On April 28, 2005 CARB adopted an 8-hour ozone standard of 0.070 ppm. The California Office of Administrative Law approved the rulemaking and filed it with the Secretary of State on April 17, 2006. The standard became effective on May 17, 2006. California has retained the 1-hour

concentration standard of 0.9 ppm. To be designated as attainment by the state, the basin will need to achieve both the 1-hour and 8-hour ozone standards.

The SCAB was designated as moderate non-attainment of the PM₁₀ standards when the designations were initially made in 1990 with a required attainment date of 1994. In 1993, the basin was redesignated as serious non-attainment with a required attainment date of 2006 because it was apparent that the basin could not meet the PM₁₀ standards by the 1994 deadline. At this time, the SCAB has met the PM₁₀ standards at all monitoring stations except the western Riverside County station where the annual PM₁₀ standards have not been met. However, on September 21, 2006, the U.S. EPA announced that it was revoking the annual PM₁₀ standard as research has indicated that there are no considerable health effects associated with long-term exposure to PM₁₀. With this change the basin is technically in attainment of the federal PM₁₀ standards although the redesignation process has not yet begun.

In July 1997, EPA issued NAAQS for fine particulate matter (PM_{2.5}). The PM_{2.5} standards include an annual standard set at 15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), based on the three-year average of annual mean PM_{2.5} concentrations and a 24-hour standard of 35 $\mu\text{g}/\text{m}^3$, based on the three-year average of the 98th percentile of 24-hour concentrations. Implementation of these standards was delayed by several lawsuits. On January 5, 2005, the EPA took final action to designate attainment and non-attainment areas under the NAAQS for PM_{2.5} effective April 5, 2005. The SCAB was designated as non-attainment with an attainment required as soon as possible but no later than 2010. EPA may grant attainment date extensions of up to five years in areas with more severe PM_{2.5} problems and where emissions control measures are not available or feasible. It is likely that the SCAB will need this additional time to attain the standard.

Although there is a PM_{2.5} standard, adequate tools are not currently available to perform a detailed assessment of PM_{2.5} emissions and impacts at the project level. Analysis of PM_{2.5} impacts is complex because it is both directly emitted from sources, like CO, and formed in the atmosphere from reactions of other pollutants, like ozone. In addition, there are no good sources for the significance thresholds for PM_{2.5} emissions at this time. Until tools and methodologies are developed to assess the impacts of projects on PM_{2.5} concentrations, the analysis of PM₁₀ will need to be used as an indicator of potential PM_{2.5} impacts.

On September 21, 2006, the EPA announced that the 24-hour PM_{2.5} standard was lowered to 35 $\mu\text{g}/\text{m}^3$. Attainment/non-attainment designations for the revised PM_{2.5} standard will be made by December of 2009 with an attainment date of April 2015 although the EPA could grant an extension of up to five years.

The SCAB has not had any violations of the federal CO standards since 2003. Therefore, the SCAB has met the criteria for CO attainment. The SCAQMD formally requested the EPA to redesignate the basin as attainment for CO. The EPA designated the basin as an attainment/maintenance area for June 11, 2007.

The federal annual NO₂ standard was met for the first time in 1992 and has not been exceeded since that time. The SCAB was redesignated as attainment for the NO₂ in 1998. The basin will remain a maintenance/attainment area until 2018, assuming the NO₂ standard is not exceeded.

Table 15 illustrates that SCAB is designated as in attainment of the federal SO₂ and lead NAAQS as well as the state CO, NO₂, SO₂, lead, hydrogen sulfide, and vinyl chloride CAAQS. Generally, these pollutants are not considered a concern in the SCAB.

Criteria Pollutants. Since the passage of the Federal Clean Air Act of 1970 (FCAA) and subsequent amendment, the U.S. EPA has established and revised the National Ambient Air Quality Standards (NAAQS). The NAAQS was established for six major pollutants or criteria pollutants. The NAAQS are two tiered: primary, to protect public health plaza, and secondary, to prevent degradation to the environment (i.e., impairment of visibility, damage to vegetation and

property). The six criteria pollutants are ozone (O₃), carbon monoxide (CO), particulate matter (PM₁₀ or PM_{2.5}), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). Table 15 presents the state and national ambient air quality standards.

Ozone (O₃). 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 the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO₂, which occur only in the presence of bright sunlight. Pollutants emitted from areas cities react during transport downwind to produce the oxidant concentrations experienced in the area.

Particulate Matter (PM₁₀ or PM_{2.5}). Particulate matter 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 (PM₁₀) and smaller than or equal to 2.5 microns (PM_{2.5}). The size of the particulate matter is referenced to the aerodynamic diameter of the particulate. The PM_{2.5} criteria are aimed at what the EPA refers to as “course particles.” Course particles are often found near roadways, dusty industries, construction sites, and fires. The PM_{2.5} criteria, which are directed at particles less than 2.5 microns in size, are referred to as “fine particles.” These fine particles can also be directly emitted and they can also form when gases emitted from power plants, industries and automobiles react in the air. The principal health effect of airborne particulate matter 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). Carbon monoxide is a colorless and odorless gas, which, in the urban environment, is associated with the incomplete combustion of fossil fuels in motor vehicles. Carbon monoxide combines with hemoglobin in the bloodstream and reduces the amount of oxygen that can be circulated through the body. High carbon monoxide concentrations can lead to headaches, aggravation of cardiovascular disease, and impairment of central nervous system functions. Carbon monoxide 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 carbon monoxide are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Overall carbon monoxide emissions are decreasing as a result of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emissions levels for vehicles manufactured since 1973.

Nitrogen Oxides (NO_x). Nitrogen oxides from automotive sources are some of the precursors in the formation of ozone and secondary particulate matter. Ozone and particulate matter 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). Lead is a stable compound, which persists and accumulates both in the environment and in animals. In humans, it affects the blood-forming or hematopoietic, the nervous, and the renal system. In addition, lead has been shown to affect the normal functions of the reproductive, endocrine, hepatic, cardiovascular, immunological, and gastrointestinal systems, although there is significant individual variability in response to lead exposure. Since 1975, lead emissions have been in decline due in part to the introduction of catalyst-equipped vehicles, and decline in production of leaded gasoline. In general, an analysis of lead is limited to projects that emit significant quantities of the pollutant (i.e. lead smelters) and are not applied to transportation projects.

Sulfur Oxides (SO_x). Sulfur oxides constitute a class of compounds of which sulfur dioxide (SO₂) and sulfur trioxide (SO₃) 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 16. Ambient Air Quality Standards

Ambient Air Quality Standards							
Pollutant	Averaging Time	California Standards ¹		Federal Standards ²			
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷	
Ozone (O₃)	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)	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 (PM_{2.5})	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis	
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	15.0 µg/m ³			
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m ³)	None	Non-Dispersive Infrared Photometry (NDIR)	
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)			
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—			—
Nitrogen Dioxide (NO₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m ³)	Same as Primary Standard	Gas Phase Chemiluminescence	
	1 Hour	0.18 ppm (339 µg/m ³)		0.100 ppm (see footnote 8)			None
Sulfur Dioxide (SO₂)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (60 µg/m ³)	—	Spectrophotometry (Pararosaniline Method)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)			
	3 Hour	—		—			0.5 ppm (1300 µg/m ³)
	1 Hour	0.25 ppm (655 µg/m ³)		—			—
Lead⁹	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	Same as Primary Standard	High Volume Sampler and Atomic Absorption	
	Calendar Quarter	—		1.5 µg/m ³			
	Rolling 3-Month Average ⁹	—		0.15 µg/m ³			
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards			
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography				
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence				
Vinyl Chloride⁹	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography				
See footnotes on next page ...							
For more information please call ARB-PIO at (916) 322-2990				California Air Resources Board (02/16/10)			

1.	California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended 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 averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration 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 µg/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 U.S. EPA for further clarification and current federal 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 procedure 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 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 EPA.
8.	To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm (effective January 22, 2010).
9.	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.
10.	National lead standard, rolling 3-month average: final rule signed October 15, 2008.
For more information please call ARB-PIO at (916) 322-2990	
California Air Resources Board (02/16/10)	

Affected Environment/Environmental Conditions

Climate. The climate in and around the project area, as with all of Southern California, is controlled largely by the strength and position of the subtropical high-pressure cell over the Pacific Ocean. It maintains moderate temperatures and comfortable humidity, and limits precipitation to a few storms during the winter “wet” season. Temperatures are normally mild, except during the summer months, which commonly bring substantially higher temperatures. In all portions of the South Coast Air Basin, temperatures well above 100 degrees Fahrenheit have

been recorded in recent years. With a more pronounced oceanic influence at the project location, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station closest to the site that monitors temperature is the Los Angeles WSO Airport Station. The annual average maximum temperature recorded from January 1971 to December 2000 at this station is 21.4°C (70.6°F), and the annual average minimum temperature recorded from January 1971 to December 2000 at this station is 13.4°C (56.1°F).

Winds in the project area are usually driven by the dominant land/sea breeze circulation system. Regional wind patterns are dominated by daytime onshore sea breezes. At night, the wind generally slows and reverses direction traveling towards the sea. Local canyons alter the wind direction; wind tends to flow parallel to the canyons. During the transition period from one wind pattern to the other, the dominant wind direction rotates into the south and causes a minor wind direction maximum from the south. Wind speeds in the project area average about 4 miles per hour (mph). Low average wind speeds together with a persistent temperature inversion limit the vertical dispersion of air pollutants throughout the Basin. Strong, dry, northerly or northeasterly winds, known as Santa Ana conditions, tend to last for several days at a time.

Southern California frequently has temperature inversions that inhibit the dispersion of pollutants. Inversions may be either ground-based or elevated. Ground-based inversions, sometimes referred to as radiation inversions, are most severe during clear, cold, early winter mornings. Under the conditions of a ground-based inversion, very little mixing or turbulence occurs, and high concentrations of primary pollutants may occur on local and major roadways. Elevated inversions can be generated by a variety of meteorological phenomena. Elevated inversions act as a lid or upper boundary and restrict vertical mixing. Below the elevated inversion, dispersion is not restricted. Mixing heights for elevated inversions are lower and more persistent in the summer. This low summer inversion puts a lid over the South Coast Air Basin (SCAB) and is responsible for the high level of ozone observed during summer months in the basin.

Monitored Air Quality. Air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the basin. Estimates for the SCAB have been made for existing emissions (“2003 Air Quality Management Plan”, August 1, 2003). The data indicates that mobile sources are major source of regional emissions. Motor vehicles (i.e., On-road mobile sources) account for approximately 45 percent of volatile organic compounds (VOC), 63 percent of nitrogen oxide (NO_x) emissions, and approximately 76 of carbon monoxide (CO) emissions.

The SCAQMD has divided the SCAB into 38 air-monitoring areas with a designated ambient air monitoring station representative of area. The project area is represented by measurements made at the Los Angeles-Westchester Parkway monitoring station. This station is located approximately 1.25 miles from the Project Study Area. The pollutants measured at this station include ozone, CO, PM_{2.5} and nitrogen dioxide (NO₂). The next nearest station is the North Long Beach station located 11.0 miles to the southeast of the Project Study Area, respectively. PM_{2.5} and PM₁₀ monitoring data are measured at this station. The air quality data monitored from 2005 to 2007 is presented in Table 17 on the following page.

The monitoring data presented in Table 17 was obtained from the CARB air quality website (www.arb.ca.gov/adam/). Federal and State air quality standards are also presented in Table 17.

Table 17. Air Quality Levels (Los Angeles-Westchester/North Long Beach)

Pollutant	California Standard	National Standard	Year	% Meas. ¹	Max. Level	Days State Standard Exceeded ²	Days National Standard Exceeded ²
Ozone	0.09 ppm For 1 hour	None	2009	94	0.8	0	--
			2008	95	0.090	0	--
			2007	97	0.093	1	--
Ozone	0.070 ppm ³ For 8 hour	0.075 ppm For 8 hour	2009	92	0.069	0	0
			2008	94	0.075	1	0
			2007	96	0.075	1	0
CO	20 ppm For 1 hour	35 ppm For 1 hour	2009	94	--	0	0
			2008	95	--	0	0
			2007	97	--	0	0
CO	9 ppm For 8 hour	9 ppm For 8 hour	2009	94	2.1	0	0
			2008	96	2.5	0	0
			2007	97	2.4	0	0
NO ₂ (1-Hour)	0.18 ppm For 1 hour	None	2009	77	0.094	0	n/a
			2008	95	0.110	0	n/a
			2007	90	0.096	0	n/a
NO ₂ (Annual)	0.03 ppm AAM ⁴	0.053 ppm AAM ⁴	2009	77	0.021	n/a	No
			2008	95	0.018	n/a	No
			2007	90	0.017	n/a	No
Particulates PM2.5 (24 Hour)	None	35 µg/m ³ For 24 hr.	2009	98	38	n/a	6
			2008	97	38	n/a	8
			2007	87	39	n/a	12
Particulates PM2.5 (Annual)	12 µg/m ³ AAM ⁴	15 µg/m ³ AAM ⁴	2009	--	6.1	--	--
			2008	--	8.2	--	--
			2007	--	13.7	--	--
Particulates PM10 (24 Hour)	50 µg/m ³ For 24 hr.	150 µg/m ³ For 24 hr.	2009	16	54	0/3	0
			2008	95	56	0/1	0
			2007	94	180	3/6	0/1
Particulates PM10 (Annual)	20 µg/m ³ AAM ⁴	None	2009	16	--	No	n/a
			2008	95	27.3	Yes	n/a
			2007	94	31.4	Yes	n/a
SO ₂ (24 Hour)	0.04 ppm For 24 Hr.	0.14 ppm For 24 hr.	2009	72	0.003	0	0
			2008	95	0.004	0	0
			2007	96	0.006	0	0
SO ₂ (Annual)	None	0.03 ppm AAM ⁴	2009	72	0.006	n/a	No
			2008	95	0.008	n/a	No
			2007	96	0.010	n/a	No

1. Percent of year where high pollutant levels were expected that measurements were made
 2. For annual averaging times a yes or no response is given if the annual average concentration exceeded the applicable standard. n/a indicates that there is no applicable standard. For the PM10 24 hour standard, daily monitoring is not performed. The first number shown in Days State Standard Exceeded column is the actual number of days measured that State standard was exceeded. The second number shows the number of days the standard would be expected to be exceeded if measurements were taken every day.
 3. This concentration standard was approved by the ARB on April 28, 2005 and is expected to become effective in early 2006.
 4. Annual Arithmetic Mean
 -- Data Not Reported or insufficient data available to determine the value.

Source: CARB Air Quality Data Statistics web site www.arb.ca.gov/adam/ accessed 06/28/10

The monitoring data presented in Table 17 shows that ozone and particulate matter (PM_{2.5} and PM₁₀) are the air pollutants of primary concern in the project area.

The State 1-hour ozone standard was exceeded only once in 2007 between 2007 and 2009 at the Los Angeles-Westchester monitoring station. The national 1-hour ozone standard was revoked in June 2005 and is no longer in effect. Therefore, it was not evaluated in this project's Air Quality Report. The Federal 8-hour ozone standard was not exceeded between 2007 and 2009 at this station. In contrast, the State 8-hour ozone standard was exceeded 1 day in 2007, 1 day in 2008, and 0 days in 2009. The data in this paragraph was obtained through the CARB Air Quality Data Statistics web site www.arb.ca.gov/adam/ on June 28, 2010. There does not appear to be a noticeable trend in either maximum ozone concentrations or days of excess ozone in the Project Study Area.

Ozone is a secondary pollutant; it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO₂, which occur only in the presence of bright sunlight. Pollutants emitted from the upwind cities react during transport downwind to produce the bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of the SCAQMD contribute to the ozone levels experienced at the monitoring station, with the more significant areas being those directly upwind.

The annual average PM_{2.5} concentrations between 2007 and 2009 were not measured at the Los Angeles-Westchester Parkway monitoring station because this station does not monitor PM_{2.5}. Existing concentrations of PM_{2.5}, therefore, have been analyzed based on monitoring data from another monitoring station – North Long Beach monitoring station. The 2006 NAAQS for 24-hour PM_{2.5} of 35 µg/m³ was exceeded at the North Long Beach monitoring station between 2007 and 2009. However, the NAAQS for annual average PM_{2.5} was not exceeded between 2007 and 2009.

The Federal standard for 24-hour concentration and standard for PM₁₀ was exceeded at the Los Angeles-Westchester Parkway station only in 2007. The State 24-hour concentration standard for PM₁₀ was exceeded in 2007, 2008, and 2009 while the State average annual standard was exceeded in 2007 and 2008. There does not appear to be a noticeable trend in either maximum particulate concentrations or days of exceedences in the Project Study Area. Particulate levels in the area are due to natural sources, grading operations, and motor vehicles.

According to the U.S. EPA, some people are much more sensitive than others to breathing fine particles (PM_{2.5} and PM₁₀). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM_{2.5} and PM₁₀. Other groups considered sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive, because many of them often breathe through their mouths.

Carbon monoxide (CO) is another important pollutant that is caused mainly by motor vehicles. Currently, CO levels in the project region are in compliance with State and Federal 1-hour and 8-hour standards.

The monitored data included in Table 17 shows that other than ozone and PM_{2.5} exceedences as mentioned above, no State or Federal standards were exceeded for the remaining criteria pollutants.

Comment from the City of Inglewood – Page 92 of the document states that the nearest monitoring station (Los Angeles-Westchester Parkway) is approximately 1.25 miles and the next nearest station is the North Long Beach station located 11.0 miles to the southeast of the Project

Study Area. The Hawthorne monitoring station is approximately 1.0 to 1.5 miles east of the Project Study Area. Unless this station has been abandoned, it should have been referred to and used to measure air quality impacts.

Response to comment – According to the July 2009 South Coast Air Quality Management District Annual Air Quality Monitoring Network Plan, the Hawthorne site (ID No. 060375001) was replaced by LAX Hastings (ID No. 060375005) in April 2004, due to the end of a property lease. The LAX Hastings site is located at 7201 West Westchester Parkway and is also known as the Los Angeles – Westchester Parkway monitoring station. As indicated in the IS/EA and in the September 2008 Air Quality Report for the proposed project, the most recent 3-year monitoring data at the Los Angeles – Westchester Parkway station were utilized in evaluating carbon monoxide operational impacts. However, the Los Angeles – Westchester Parkway monitoring station does not analyze PM_{2.5}; and thus an analysis of operation impacts to PM_{2.5} and PM₁₀ has required monitoring data from another monitoring station. As a result and as indicated in the September 2008 Air Quality Report, the North Long Beach monitoring station was identified based on the proximity to the project site, proximity to the influence, i.e., I-405, and comparable surround land use.

Sensitive Receptors. Generally, sensitive receptors are facilities or land uses that include members of the population sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Residential land uses in the vicinity of the Project Study Area are located along both sides of I-405 from Arbor Vitae Street to Century Boulevard. Two schools, two public parks, a university, and a church are located within a quarter-mile of the project impact area around I-405 from Arbor Vitae Street to Century Boulevard.

Potential Impacts as a Result of Proposed Project Implementation

Summary. Compliance with the Transportation Conformity requirements of the Federal Clean Air Act (FCAA) is demonstrated in this project. A regional air quality analysis is performed to demonstrate that the project will not adversely impact regional air quality. A local air quality analysis is performed to demonstrate that the project will not adversely impact local air quality, in the immediate vicinity of the project. The report also discusses potential impacts from Diesel Particulate Matter that has been listed by CARB as a toxic substance and presents measures to reduce PM₁₀ emissions during construction. The potential for release of Naturally Occurring Asbestos (NOA) during construction is also discussed. This proposed but rejected project was not a Transportation Corridor Management (TCM) project.

The project is located in the South Coast Air Basin (SCAB). The South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB) are responsible for regulating air pollutant sources in the Basin. The SCAQMD prepares the Air Quality Management Plan (AQMP) that specifies measures to meet the state and national ambient air quality standards (CAAQS and NAAQS). To demonstrate that the project will not adversely impact the region's air quality, the air quality data about this project must show that it will not result in the transportation system exceeding the air pollution budgets in the AQMP.

The 2008 Regional Transportation Plan (RTP) and 2008 Regional Transportation Improvement Program (RTIP) prepared by the Southern California Association of Governments (SCAG) are regional plans for future improvements in the areas transportation system. These plans must demonstrate that the air pollutant emissions associated with the regional transportation plan do not exceed the emissions budgets in the approved AQMP. The proposed but rejected project is part of the 2008 RTP and 2008 RTIP. Therefore, the project will not result in an exceedence of the transportation air pollutant emissions budgets and will not adversely impact regional air quality and the project will be removed from upcoming RTPs and RTIPs as No-Build Alternative 1 has been identified as the Preferred Alternative.

Local impacts, also known as “hot-spots,” are assessed for CO, PM₁₀, and PM_{2.5}. The CO impacts are assessed using the “Transportation Project-Level Carbon Monoxide Protocol” (Protocol) developed by the Institute of Transportation Studies at the University of California Davis for Caltrans. The protocol contains a series of flow charts with criteria to determine whether or not the project will result in local CO concentrations that exceed the state and national ambient air quality standards (AAQS). Based upon this protocol, the project will not result in an adverse local CO impact.

A PM_{2.5} and PM₁₀ hot-spot analysis is not required for projects that are not a project of air quality concern (POAQC). In the South Coast Air Basin, it is the SCAG’s Transportation Conformity Working Group (TCWG) that makes the determination whether the project is or is not a POAQC. The required “PM Conformity Hot-spot Analysis – Project Summary for Interagency Consultation” was submitted to the TCWG for consideration at their July 22, 2008 meeting. The project was determined not to be a project of air quality concern because the facility is not expected to have a significant number of diesel vehicles (i.e. less than 10,000 per day), and because the project would not result in any increase in the number of diesel trucks that would utilize the facility. The redistribution of traffic is minor and would occur primarily near residential and commercial areas that have little truck traffic and only a marginal effect on truck movements. Therefore, the project will not result in an adverse local PM_{2.5} or a PM₁₀ impact.

§93.123(b)(1) requires that the PM₁₀, and PM_{2.5} analysis be quantitative. However, §93.123(b)(4) waives this analysis requirement until the EPA releases modeling guidance and announces such guidance in the Federal Register. Since no modeling guidance has been released to date, §93.123(b)(4) offsets the implementation of §93.123(b)(1) and only a qualitative analysis is required.

On March 10, 2006, the EPA released guidance on PM₁₀ and PM_{2.5} analyses, titled Transportation Conformity Guidance for Qualitative Hot-spot Analysis in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas. This guidance supersedes previous FHWA and PM₁₀ and PM_{2.5} guidance. The analysis for PM₁₀ and PM_{2.5} hot-spot was performed under the March 2006 EPA Guidance.

Impacts from Mobile Source Air Toxics (MSATs) are also examined in the project’s Air Quality Report. The analysis shows that the estimated vehicles miles traveled (VMT) are expected to decrease between the Build and No-Build Alternatives at the surrounding intersections (Century Boulevard, La Cienega Boulevard/Olive Street and Manchester Avenue). The MSAT analysis acknowledges that the project may result in increased exposure to some receptors nearby and in higher localized MSAT effects when compared to the No-Build alternative. Nevertheless, emissions will be low to no appreciable difference in overall MSAT emissions between the Build and No-Build Alternative. Also, regardless of the alternative identified, emissions will be lower than present levels in the design year as a result of EPA’s national control programs that are projected to reduce MSAT emissions by 57 percent to 87 percent between 2000 and 2020. Although some studies have reported that proximity to roadways is related to adverse health impact from MSATs, the FHWA cannot evaluate the validity of these studies at this time. Therefore, MSAT concentrations or exposures created by the project cannot be predicted with enough accuracy to be useful in estimating health impacts.

Comment from the City of Inglewood – Was CALINE3 or a similar dispersion model used to predict the impact of air quality conditions on the sensitive receptors referred to on Page 94 of the report? A dispersion model sensitive receptors. There are a number of published studies and reports that suggest carcinogens (i.e. benzene, diesel exhaust, butadiene, etc) do greater damage to children and the elderly and residents that reside within 250 feet of a highway with a minimum 20,000 daily vehicles. If a dispersion model analysis was not included, it is recommended that this be performed.

Response to comment – CALINE3 has not been validated for use with pollutants such as mobile sources air toxics (MSAT) and requires information that is unavailable and incomplete for use in analyses at the project-level as discussed under Additional Air Quality Topics in the IS/EA as well as in Section 5.1.2 of the September 2008 Air Quality Report. Nevertheless, the level of future MSAT emissions for the project was qualitatively assessed in accordance with the Federal Highway Administration's Interim Guidance on Air Toxics Analysis in NEPA Documents (February 3, 2006). The qualitative MSAT assessment evaluates the level of traffic for the proposed project and provides comparative discussions in the IS/EA as well as in Section 5.1.3 of the September 2008 Air Quality Report.

Regional Air Quality Analysis

Rules and Implementation. The authority requiring projects to undergo a regional emissions analysis originates from 176 (c) of the Clean Air Act Amendments of 1990. The law is codified as Title 23 of the United States Code (23 U.S.C.) and is known as the Federal Transit Act. The regulation cited to implement 23 U.S.C. is contained in Title 30 of the Code of Federal Regulation parts 51 and 93 (40 CFR 51 and 40 CFR 93). Parts 51 and 93 are commonly recognized as the Transportation Conformity Rule. On August 15, 1997, the Federal Register published a public notice in which the U.S. EPA requested to streamline the 40 CFR 51 & 93. The final rule issued by the EPA modified 40 CFR 51 and 93, and classified the Transportation Conformity Rule as 40 CFR 51.390 and 40 CFR 93.100 – 93.128.

The Transportation Conformity Rule requires a regional emissions analysis to be performed by the Metropolitan Planning Organization (MPO) for projects within its jurisdiction. For the South Coast Air Basin, the MPO is the Southern California Association of Governments (SCAG). The regional emissions analysis includes all projects listed in the Regional Transportation Plan (Plan or RTP) and the Regional Transportation Improvement Program (TIP or RTIP). The RTP is a planning document spanning a 25-year period and the TIP implements the Plan on a 6-year increment. Both the Plan and TIP must support an affirmative conformity finding to obtain FHWA approval. Projects in a Plan and TIP that have been approved by the Federal Highway Administration (FHWA) are considered to have met the conformity requirement for regional emissions analysis.

The most recently approved RTP and TIP are the 2008 RTP and the 2008 RTIP. The proposed project is partially funded and in the Southern California Association of Governments 2008 Regional Transportation Plan (RTP). The 2008 RTP was adopted by SCAG on May 8, 2008 as Resolution #08-497-2. The FHWA approved the 2008 RTP on June 5, 2008. The 2008 RTIP was adopted by SCAG on July 17, 2008 as Resolution #08-498-1. The 2008 RTIP was approved by the FHWA and the FTA on January 14, 2009. The project will be removed from upcoming RTPs and RTIPs as No-Build Alternative 1 has been identified as the Preferred Alternative.

In order to obtain FHWA approval of the Plan and TIP as conforming, the following tests, demonstrating affirmative findings with respect to the Transportation Conformity Rule, were applied to the 2008 RTP:

- Regional Emissions Analysis (Sections 93.109, 93.110, 93.118, and 93.119)
- Timely Implementation of TCMs Analysis (Section 93.113)
- Financial Constraint Analysis (Section 93.108)
- Interagency Consultation and Public Involvement Analysis (Sections 93.105 and 93.112)

Likewise, the approval of the 2008 RTIP is contingent upon satisfying all relevant CFR sections applicable:

- Consistency with SCAG's 2008 RTP (Section 450.324 of the U.S. DOT Metropolitan Planning Regulations)
- Regional Emissions Analysis (Sections 93.109, 93.118, and 93.119)

- Timely Implementation of TCMs Analysis (Section 93.113)
- Financial Constraint Analysis (Section 93.108)
- Interagency Consultation and Public Involvement Analysis (Sections 93.105 and 93.112)

Project Inclusion in Approved RTP and RTIP. The proposed project is included in the 2008 RTIP and referenced in the Plan. It is listed in Section II of Volume II of the 2008 RTIP, state highway section, Los Angeles County. The project will be removed from upcoming RTPs and RTIP as No-Build Alternative 1 has been identified as the Preferred Alternative. The following project information is excerpted from the 2008 RTIP:

- Lead Agency – Caltrans
- Project ID # - 49160
- Air Basin – SCAB
- Model # - L270
- Program Code – CARH3
- Route – 405
- Begin Post Mile – 22.2
- End Post Mile – 23.4
- Description from the 2008 RTIP, State Project List on page 29 of 537 – In Inglewood at Arbor Vitae Street – Construct South Half of Interchange (EA# 491601, PPNO 0831)

As previously mentioned, the MPO performs the regional analysis as part of the submitted Plan and TIP. The regional analysis requirement is deemed satisfied and conforming to the Transportation Conformity Rule upon FHWA approval of the RTP and RTIP. Projects in the TIP and Plan meet the regional analysis criterion by reference to the two documents.

Construction-Related Emissions. Construction activities associated with Alternative 2 would be temporary and would last the duration of project construction. The discussion below has concluded that project construction would not create adverse pollutant emissions for any of the alternatives under consideration. Short-term impacts to air quality would occur during minor grading/trenching, new pavement construction and the re-stripping phase. Additional sources of construction related emissions include:

- Exhaust emissions and potential odors from construction equipment used on the construction site as well as the vehicles used to transport materials to and from the site; and
- Exhaust emissions from the motor vehicles of the construction crew.

Project construction would result in temporary emissions of CO, NO_x, ROG, and PM₁₀. Stationary or mobile powered On-site construction equipment includes trucks, tractors, signal boards, excavators, backhoes, concrete saws, crushing and/or processing equipment, graders, trenchers, pavers and other paving equipment. The amount of worker trips to the site is unknown at this time. However, given the high volume of traffic in the area, the addition of worker trips will be inconsequential. Based on the insignificant number of daily work trips required for project construction, construction worker trips are not anticipated to significantly contribute to or affect traffic flow on local roadways and are therefore not considered significant. During the demolition phase some asphalt concrete (AC) pavement and curbs and gutters would have to be removed.

In order to further minimize construction-related emissions, all construction vehicles and construction equipment would be required to be equipped with the state-mandated control devices pursuant to state equipment regulations and standard construction practices. After the completion of the project's construction, all construction-related impacts would cease, thus resulting in a less than significant impact. Short-term construction PM₁₀ emissions would be further reduced with the implementation of required dust suppression measures outlined within SCAQMD Rule 403. Note that Caltrans Standard Specifications for construction (Sections 10 and

18 [Dust Control] and Section 39-3.06 [Asphalt Concrete Plants]) must also be adhered to. Therefore, project construction is not anticipated to violate State or Federal air quality standards or contribute to the existing air quality violation in the air basin.

Section 93.122(d)(2) of the U.S. EPA Transportation Conformity Rule requires that in PM₁₀ non-attainment and maintenance areas (for which the State Implementation Plans (SIPs) identify construction-related fugitive dust as a contributor to the area problem), the RTIP should conduct the construction-related fugitive PM₁₀ emission analysis. The 2003 PM₁₀ SIP/AQMP emissions budgets for SCAB include the construction and unpaved road emissions. The 2008 RTIP PM₁₀ regional emissions analysis includes the construction and unpaved road emissions for conformity finding.

Minimization of PM₁₀ During Construction

The approved 2004 Particulate Matter SIP contains provisions calling for mitigation of PM₁₀ emissions during construction. Pursuant to §93.117, Caltrans, the project sponsor, is required to stipulate to include, in its final plans, specifications, and estimates, control measures that will limit the emission of PM₁₀ during construction.

The PM₁₀ emissions is a composite of geologic and aerosol variety. The prime concern during construction is to mitigate geologic PM₁₀ that occurs from earth movement such as grading. SCAQMD sponsored the PM₁₀ SIP is with concurrence by the CARB. The SCAQMD has amended the 2004 Rule 403 Implementation Handbook (Handbook) in June 2005. It addresses the mitigation of PM₁₀ by reducing the ambient entrainment of fugitive dust. Fugitive dust consists of solid particulate matters that become airborne due to human activity such as construction and is a subset of total suspended particulates. Likewise, PM₁₀ is a subset of total suspended particulates. The Handbook states that 50 percent of total particulate matter suspended comprise of PM₁₀. Hence, minimizing fugitive dust, emissions of geologic PM₁₀ are reduced.

During construction of the proposed project, the property owner/developer and its contractors shall be required to comply with regional rules, which shall assist in reducing short-term air pollutant emissions. SCAQMD Rule 402 requires that air pollution emissions not be a off-site. SCAQMD Rule 403 requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Two options are presented in Rule 403: Monitoring of particulate concentrations or active control. Monitoring involves a sampling network around the project with no additional control measures unless specified concentrations are exceeded. The active control option does not require any monitoring, but requires that a list of measures be implemented starting with the first day of construction. This project will be in full compliance with both Rule 402 and Rule 403. No minimization and/or mitigation measures are proposed for No-Build Alternative 1 since there will be no impacts on these resources.

Local Air Quality Analysis

Overview of Local Analysis. The local analysis is commonly referred to as project level air quality or “hot-spot” analysis. The primary focus is the operational impact on air quality created by the proposed improvement. Unlike a regional analysis, a local analysis is constrained in scope and is limited to a particular project. The criteria pollutants analyzed do not consist of all pollutants in non-attainment. The analysis is restricted to carbon monoxide, PM₁₀, PM_{2.5}. The analysis years consist of the year opening to traffic and the ultimate horizon year referenced in the approved Regional Transportation Plan rather than a series of present and future years. The approach to the local analysis is tiered and is dependent on the status of the carbon monoxide SIP: the CO analysis can be qualitative, quantitative, or computational. The PM₁₀ and PM_{2.5} analysis is qualitative in scope.

Similar to the regional analysis, the Transportation Conformity Rule also applies to the local analysis. Sections of pertinence are 40 CFR 93.115 to 93.117, 93.123, and 93.126 to 93.128. In California, the procedures of the local analysis for carbon monoxide are modified pursuant §93.123(a)(1). Sub-paragraph (a)(1) states the following:

Local Analysis: Carbon Monoxide Operational Impacts

CO hot-spot analysis. (1) The demonstrations required by §93.116 (“Localized CO and PM₁₀ violations”) must be based on a quantitative analysis using the applicable air quality models, databases, and other requirements specified in 40 CFR part 51, Appendix W (Guideline on Air Quality Models). These procedures shall be used in the following cases, unless different procedures developed through the interagency consultation process required in §93.105 and approved by the U.S. EPA Regional Administrator are used:

The sub-paragraph (a)(1) allows for an alternative. In California, the procedure for performing a CO analysis is detailed in the Transportation Project-Level Carbon Monoxide Protocol (Protocol) developed by the Institute of Transportation Studies at the University of California, Davis. David P. Howekamp, Director of the Air Division of the U.S. EPA Region IX, approved the Protocol in October 1997. The EPA deemed the Protocol as an acceptable option to the mandated quantitative analysis. The Protocol incorporates §93.115 – 93.117, §93.126 – 93.128 into its rules and procedures.

The scope required for local analysis is summarized in Section 3, Determination of Project Requirement, and Section 4, Local Analysis, of the Protocol. Section 3 incorporates §93.115 and the procedure to determine project requirements begins with the Figure 1: Requirements for New Projects. The sections cited is followed by a response, which will determine the next applicable section of the flowchart for the proposed project.

The project is currently classified as being in attainment/maintenance for CO. The project was redesignated as in “attainment” after the 1990 Clean Air Act and has shown continued attainment for CO. The most recent 3 years of the 4-highest CO data monitored at the Los Angeles – Westchester Parkway station indicate that there is no recorded violation within the most recent three years of CO data. On June 11, 2007, the SCAB was redesignated as in attainment/maintenance for the CO NAAQS. The project has the potential to worsen air quality by way of: 1) an increase in cold starts, 2) increase in traffic volumes, and 3) worsening of traffic flows. Although the project will not increase the percentage of vehicles operating in false start mode or increase traffic volumes along the I-405 mainline, it will increase or decrease traffic volumes, particularly the AM and PM Peaks, by five percent or less at the intersections under study. The proposed project is anticipated to relieve congestion at the existing neighboring interchanges, and to reduce travel time on the freeway and adjacent local streets. The proposed project would also help re-distribute the traffic from the surrounding existing local intersections. The Arbor Vitae New South Half Interchange is not expected to worsen the traffic flow but is anticipated to improve flows during AM and PM peaks and overall Level of Service (LOS) at some local intersections. Traffic will worsen on intersections on Arbor Vitae Street.

In general, the background CO concentration and the vehicular air pollutant emission factors are projected to decrease steadily in the future years due to newer, cleaner vehicles. While the local traffic volumes are project to increase slightly in the future, this increase in volumes is more than offset by the decrease of background CO levels and lower emission factors. The proposed project will not cause or contribute to any new violation of the federal CO standard.

Local Analysis: PM_{2.5} and PM₁₀ Operational Impacts

Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by all projects in the nonattainment and maintenance areas that are subject to transportation conformity. Section 176(c)(1)(B) states that federally-supported transportation projects must not “cause or contribute

to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area.” To meet statutory requirements, the March 10, 2006 final rule requires PM_{2.5} and PM₁₀ hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative PM_{2.5} and PM₁₀ hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, the EPA determined that projects not designated in 40 CFR 93.123(b)(1) as projects of air quality concern (PQAQC) have also met statutory requirements without any further hot-spot analyses (40 CFR 93.116(a)).

A PM_{2.5} and PM₁₀ hot-spot analysis is not required for projects that are not a POAQC. In the South Coast Air Basin, it is the Southern California Association of Governments (SCAG) Transportation Conformity Working Group (TCWG) that makes the determination whether the project is or is not a POAQC. The TCWG is a forum to support interagency coordination to help improve air quality and maintain inclusive air quality planning process and to fulfill the interagency consultation requirements of the Federal Transportation Conformity Rule. Membership of the Southern California TCWG include federal (U.S. EPA, U.S. EPA Region 9, FHWA, FTA), state (CA Air Resources Board, Caltrans), regional (Air Quality Management Districts, SCAG, etc.), and sub-regional (County Transportation Commissions) agencies and other stakeholders.

The required “PM Conformity Hot Spot Analysis – Project Summary for Interagency Consultation” was submitted to the TCWG for consideration at their July 22, 2008 meeting. The notice posted on the TCWG website that this project (#ID 49160) is not a POAQC. A copy of the project summary submitted to the SCAG TCWG and a list of its determinations is provided in the Appendices.

The project was determined not to be a project of air quality concern because the facility is not expected to have a significant number of diesel vehicles (i.e. less than 10,000 per day), and because the project would not result in any increase in the number of diesel trucks that would utilize the facility. The redistribution of traffic is minor and would occur primarily near residential and commercial areas that have little truck traffic and only a marginal effect on truck movements. Therefore, the project will not result in an adverse local PM_{2.5} or a PM₁₀ impact. The “Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas,” (U.S. EPA & FHWA, March 2006) provides examples of projects that are not an air quality concern. The first example is consistent with this proposed project, and the example is described as “Any new or expanded highway project that primarily services gasoline vehicle traffic (i.e., does not involve a significant number of increase in the number of diesel vehicles), including such projects involving congested intersections operating at Level-of-Service D, E, or F...” The project is not expected to increase the number of diesel vehicles on I-405, the on- and off-ramps, and intersections within the Project Study Area, and accordingly, the TCWG determined that this project is not a project of air quality concern.

Additional Air Quality Topics

Mobile Source Air Toxics. In addition to the criteria air pollutants for which there are National Ambient Air Quality Standards (NAAQS), EPA also regulates air toxics. Most air toxics originate from human-made sources, including On-road mobile sources, non-road mobile sources (e.g. airplanes), area sources (e.g. dry cleaners) and stationary sources (e.g.s. factories or refineries).

Mobile Source Air Toxics (MSATs) are a subset of the 188 air toxics defined by the Clean Air Act. The MSATs are compounds emitted from highway vehicles and non-road equipment. Some toxic compounds are present in fuel and emitted to the air when the fuel evaporates or passes through the engine unburned. Other toxics are emitted from the incomplete combustion of fuels or as secondary combustion products. Metal air toxics also result from engine wear or from impurities in oil or gasoline.

The EPA is the lead Federal Agency for administering the Clean Air Act and has certain responsibilities regarding the health effects of MSATs. The EPA issued a Final Rule on Controlling Emissions of Hazardous Air Pollutants from Mobile Source 66 FR 17229 (March 29, 2001). This rule was issued under the authority in Section 202 of the Clean Air Act. In its rule, the EPA examined the impacts of existing and newly promulgated mobile source control programs, including its reformulated gasoline (RFG) program, its national low emission vehicle (NLEV) standards, its Tier 2 motor vehicles emissions standards and gasoline sulfur control requirements, and its proposed heavy duty engine and vehicle standards and On-highway diesel fuel sulfur control requirements. Between 2000 and 2020, FHWA projects that even with a 64 percent increase in vehicle miles traveled (VMT), these programs will reduce On-highway emissions of benzene, formaldehyde, 1, 3-butadiene, and acetaldehyde by 57 percent to 65 percent, and will reduce On-highway diesel Particulate Matter (PM) emissions by 87 percent, as shown in Figure 2-17 (Federal Highway Administration, Memorandum: Interim Guidance on Air Toxics Analysis in NEPA Documents, September 30, 2009) on the following page.

As a result, EPA concluded that no further motor vehicle emissions standards or fuel standards were necessary to further control MSATs. The agency is preparing another rule under authority of CAA Section 202(l) that will address these issues and could make adjustments to the 21 full MSATs and the primary six MSATs.

California's vehicle emission control and fuel standards are more stringent than Federal standards, and are effective sooner, so the effect of air toxics of combined State and Federal regulations is expected to result in greater emission reductions, more quickly, than the FHWA analysis shows. The FHWA analysis with modifications related to the use of the California-specific EMFAC model rather than the MOBILE model, would be conservative in its findings.

Additional efforts are being undertaken by the CARB to control diesel particulate matter (PM). The CARB has found that diesel PM contributes over 70 percent of the known risk air toxics and poses the greatest cancer risks among all designated air toxics. Diesel trucks contribute more than half of the total diesel combustion sources. However, the CARB has adopted a Diesel Risk Reduction Plan (DRRP) with control measures that would reduce the overall diesel PM emissions by about 85% from 2000 to 2020. In addition, total toxic risk from diesel exhaust may only be exposed for a much shorter duration. Diesel PM is only one of many environmental toxics and those of other toxics and other pollutants in various environmental media that may overshadow its cancer risks. Therefore, while diesel exhaust may pose potential cancer risks to receptors spending time on or near high-risk diesel PM facilities, most receptors' short-term exposure would only cause minimal harm, and these risks would also greatly diminish in the future operating years of the project due to planned emission control regulations.

From 2000 to 2010, CARB staff predicts diesel PM emissions and risk would decrease by only about 20 percent if the recommended are not implemented. This reduction would result from the implementation of existing federal and state regulations and the attrition of older diesel-fueled passenger cars and light-duty trucks from the on-road fleet. The U.S. EPA has proposed new, lower emission standards for heavy-duty trucks for 2007 and lower sulfur limits for diesel fuel (on-road vehicles only) in 2006. The benefits of these proposed rules are not included as existing measures because they have not yet been adopted.

The recommended measures can be grouped as follows: measures addressing on-road vehicles, measures addressing off-road equipment and vehicles, and measures addressing stationary and portable engines. These measures include the EPA's 2007 new heavy-duty truck standards and the 2006 low-sulfur diesel fuel limits. Off-road recommended measures will have the largest impact, resulting in over 90 percent reduction of the diesel PM reductions associated with all of the off-road measures. On-road and stationary and portable recommended measures would result in about an 80 reduction of the diesel PM reductions associated with all of the on-road and stationary and portable recommended measures.

Figure 2-18. Projected Percent Reduction in Diesel PM Cancer Risk from Year 2000 Levels

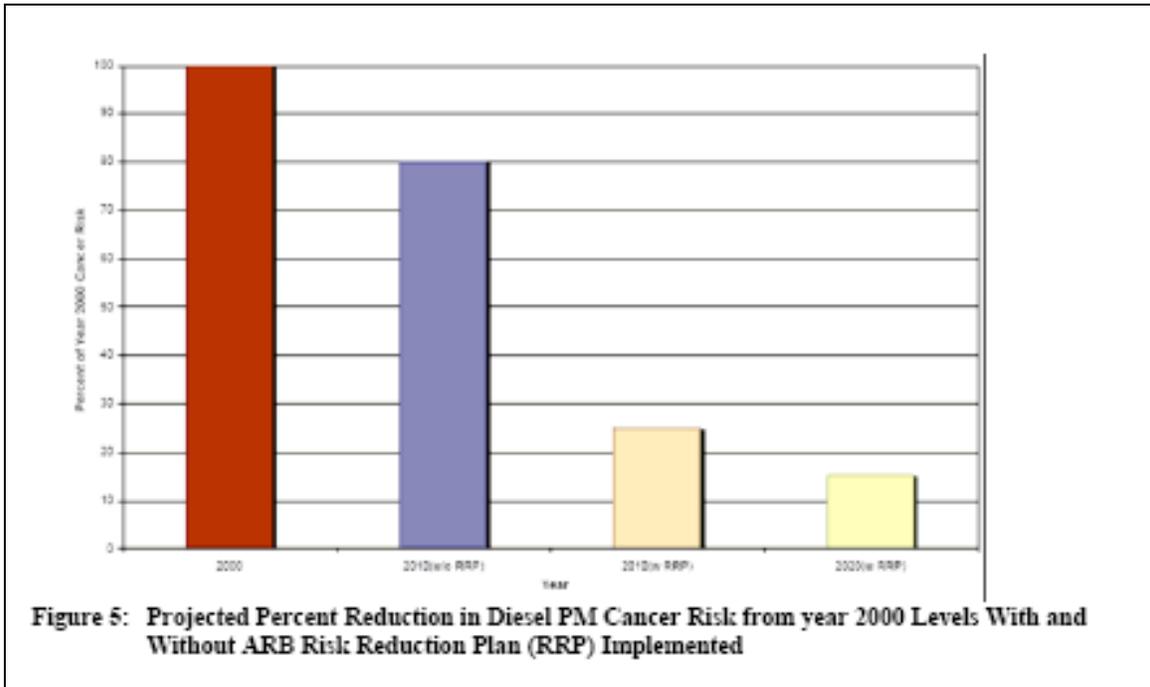
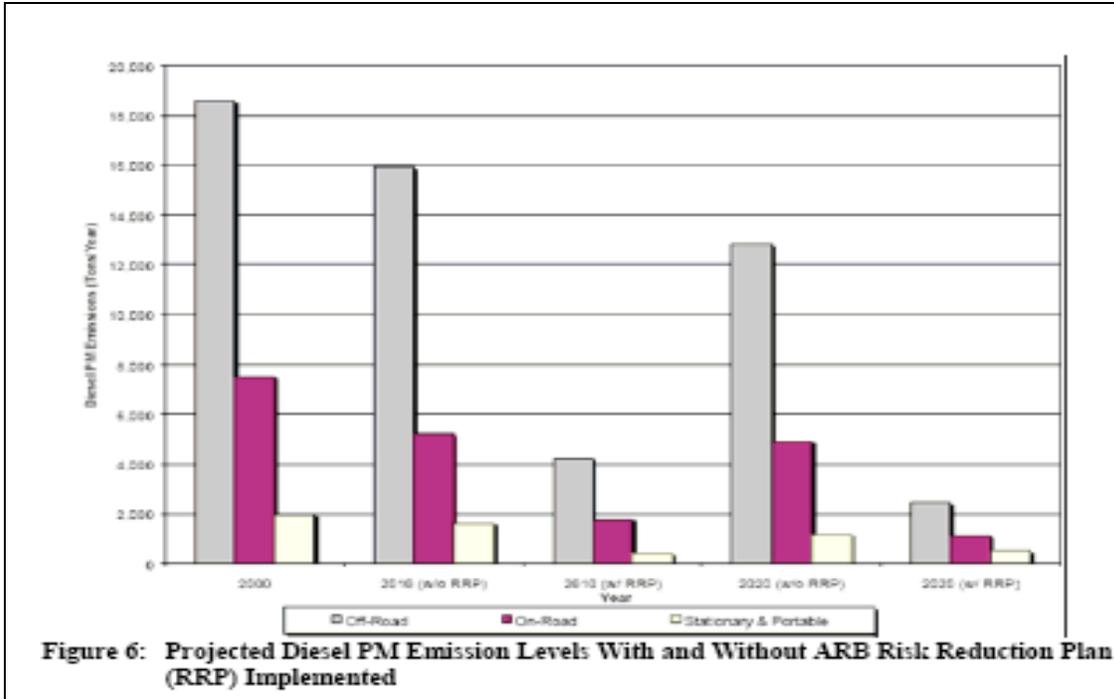


Figure 2-19. Projected Diesel PM Emission Levels With and Without ARB Risk Reduction Plan



Unavailable Information for Project Specific MSAT Impact Analysis

This study includes a basic analysis of the likely MSAT emission impacts of this project per FHWA guidance (Federal Highway Administration, Memorandum: Interim Guidance on Air Toxics

Analysis in NEPA Documents, September 30, 2009). However, available technical tools do not enable us to predict the project-specific health impacts of the emission changes associated with the Alternatives in this study. Due to these limitations, the following discussion is included in accordance with CEQ regulations (40 CFR 1502.22(b)) regarding incomplete or unavailable information:

Information that is Unavailable or Incomplete. Evaluating the environmental and health impacts from MSATs on a proposed highway project would involve several key elements, including emissions modeling, dispersion modeling in order to estimate ambient concentrations resulting from estimated emissions, exposure modeling in order to estimate human exposure to the estimated concentrations, and then final determination of health impacts based on the estimated exposure. Each of these steps is encumbered by technical shortcomings or uncertain science that prevents a more complete determination of the MSAT health impacts of this project.

Emissions. The U.S. EPA and California EPA tools to estimate MSAT emissions from motor vehicles are not sensitive to key variables determining emissions of MSATs in the context of highway projects. MOBILE 6.2 has been developed by the U.S. EPA to predict On-road vehicular emissions. EMFAC (either EMFAC2002 or the EMFAC2007 version) has been developed by the California Air Resources Board to predict vehicular emissions in California. While both MOBILE 6.2 and EMFAC2007 are used to predict emissions at a regional level, they have limitations when applied at the project level. Both are trip-based models – emission factors are predicted based on a typical trip length of around 7.5 miles, and on average speeds for this typical trip. This means that neither model has the ability to predict emission factors for a specific vehicle operating condition at a specific location at a specific time. Because of this limitation, both models can only approximate emissions from the operating speeds and levels of congestion likely to be present on the largest-scale projects, and cannot adequately capture emissions effects of smaller projects. For Particulate Matter (PM), the MOBILE 6.2 model results are not sensitive to average trip speed; however, PM emissions from the EMFAC model are sensitive to trip speed, so for California conditions diesel PM emissions are treated the same as other emissions. Unlike MOBILE 6.2, the EMFAC model does not provide MSAT emission factors; Off-model speciation of EMFAC's Total Organic Compounds output must be used to generate MSAT emissions. The emissions rates used in both MOBILE 6.2 and EMFAC are based on a limited number of vehicle tests.

These deficiencies compromise the capability of both MOBILE 6.2 and EMFAC2007 to estimate MSAT emissions. Both are an adequate tool for projecting emissions trends, and performing relative analyses between alternatives for very large projects, but neither is sensitive enough to capture the effects of travel changes caused by smaller projects or to predict emissions near specific roadside locations.

Dispersion. The tools to predict how MSATs disperse are also limited. The U.S. EPA's current regulatory models, CALINE3 and CAL3QHC, were developed and validated more than a decade ago for the purpose of predicting episodic concentrations of carbon monoxide (CO) to determine compliance with the NAAQS. The CALINE4 model used in California is an improvement on the CALINE3-based EPA models but like them, was built primarily for CO analysis. This model has not been specifically validated for use with other materials such as MSATs, and is difficult to use for averaging periods of more than 8 hours or so (health risk data for MSATs are typically based on 24-hour, annual, and long term (30-70 years) exposure). Dispersion models are appropriate for predicting maximum concentrations that can occur at some time at some location within a geographic area but cannot accurately predict exposure patterns at specific times at specific locations across an urban area to assess potential health risk. The National Cooperative Highway Research Program (NCHRP) is conducting research on best practices in applying models and other technical methods in the analysis of MSATs. This work also will focus on identifying appropriate methods of documenting and communicating MSAT impacts in the NEPA process and to the general public. Along with these general limitations of dispersion models, FHWA is

also faced with a lack of adequate monitoring data in most areas for use in establishing project-specific MSAT background concentrations.

Exposure Levels and Health Effects. Finally, even if emission levels and concentrations of MSATs could be accurately predicted, shortcomings in current techniques for exposure assessment and risk analysis preclude us from reaching meaningful conclusions about project-specific health impacts. Exposure assessments are challenging because it is difficult to accurately calculate annual concentrations of MSATs near roadways, and to determine the portion of a year that people are actually exposed to those concentrations at a specific location. These difficulties are magnified for 70-year cancer assessments, particularly because unsupportable assumptions would have to be made regarding changes in travel patterns and vehicle technology (which affects emissions rates) over a 70-year period. There are also considerable uncertainties associated with the existing estimates of toxicity of the various MSATs, because of factors such as low-dose extrapolation and translation of occupational exposure data to the general population. Because of these shortcomings, any calculated difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with calculating the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against other project impacts that are better suited for quantitative analysis.

Summary of Existing Credible Scientific Evidence Relevant to Evaluating the Impacts of MSATs.

Research into the health impacts of MSATs is ongoing. For different emission types, there are a variety of studies that show that some are either statistically associated with adverse health outcomes through epidemiological studies (frequently based on emissions levels found in occupational settings) or that animals demonstrate adverse health outcomes when exposed to large doses.

Exposure to toxic has been a focus of a number of U.S. EPA efforts. Most notably, the agency conducted the National Air Toxics Assessment (NATA) in 1996 to evaluate modeled estimates of human exposure applicable to the county level. While not intended for use as a measure or benchmark for local exposure, the modeled estimates in the NATA database best illustrate the levels of various toxics when aggregated to a Federal or State level.

The EPA Integrated Risk Information System (IRIS) is a database of human health effects that may result from exposure to various substances found in the environment. The IRIS database is located at <http://www.epa.gov/iris>. The following toxicity information for the six prioritized MSATs was taken from the IRIS database *Weight of Evidence Characterization* summaries. This information is taken verbatim from EPA's IRIS database and represents the Agency's most current evaluation of the potential hazards and toxicology of these chemicals or mixtures. The five organic-based MSAT's listed below are also listed as toxic air contaminants by the California Air Resources Board (CARB).

Benzene is characterized as a known human carcinogen.

The potential carcinogenicity of **acrolein** cannot be determined because the existing data is inadequate for an assessment of human carcinogenic potential for either the oral or inhalation route of exposure.

Formaldehyde is a probable human carcinogen, based on limited evidence in humans, and sufficient evidence in animals.

1, 3-butadiene is characterized as carcinogenic to humans by inhalation.

Acetaldehyde is a probable human carcinogen based on increased incidence of nasal tumors in male and female rats and laryngeal tumors in male and female hamsters after inhalation exposure.

Diesel exhaust (DE) is likely to be carcinogenic to humans by inhalation from environmental exposure. Diesel exhaust as reviewed in this document is the combination of diesel particulate matter and diesel exhaust organic gases. The PM fraction of diesel exhaust (Diesel PM) has been designated by CARB as a toxic air contaminant due to long-term cancer risk.

Diesel exhaust is also connected with chronic respiratory effects, possibly the primary non-cancer hazard from MSATs. Prolonged exposures may impair pulmonary function and could produce symptoms, such as cough, phlegm, and chronic bronchitis. Exposure relationships have not been developed from these studies.

There have been other studies that address MSAT health impacts in proximity to roadways. The Health Effects Institute, a non-profit organization funded by EPA, FHWA, and industry, has undertaken a major series of studies to research near-roadway MSAT hot-spots, the health implications of the entire mix of mobile source pollutants, and other topics. The final summary of the series is not expected for several years.

Some recent studies have reported that proximity to roadways is related to adverse health outcomes – particularly respiratory problems. Much of this research is not specific to MSATs, instead surveying the full spectrum of both criteria and other pollutants. The FHWA cannot evaluate the validity of these studies, but more importantly, they do not provide information that would be useful to alleviate the uncertainties listed above and enable us to perform a more comprehensive evaluation of the health impacts specific to this project.

Relevance of Unavailable or Incomplete Information to Evaluating Reasonably Foreseeable Significant Adverse Impacts on the Environment, and Evaluation of impacts based upon theoretical approaches or research methods generally accepted in the scientific community.

Because of the uncertainties outlined above, a reliable quantitative assessment of the effects of air toxic emissions impacts on human health cannot be made at the project level. While available tools do allow us to reasonably predict relative emissions changes between alternatives for larger projects, the amount of MSAT emissions from each of the project alternatives cannot be predicted with enough accuracy to be useful in estimating health impacts. (As noted above, the current emissions model is not capable of serving as a meaningful emissions analysis tool for smaller projects.) Therefore, the relevance of the unavailable or incomplete information is that it is not possible to make a determination of whether any of the alternatives would have “significant adverse impacts on the human environment.”

Below, a quantitative analysis of MSAT emissions in the project area is provided. This analysis acknowledges that the project may result in slightly increased exposure to MSAT emissions in certain locations compared to no project conditions. However, the analysis shows that exposure to MSAT emissions in the future will be less than current conditions. The concentrations and duration of exposure are uncertain, and because of this uncertainty, the health effects from these emissions cannot be estimated.

MSAT Emissions in the Project Area. As discussed above, the technical shortcomings of emissions and dispersion models and uncertain science with respect to health effects prevent meaningful or reliable estimates of the MSAT emissions and effects of this project. However, even though reliable methods do not exist to accurately estimate the health impacts of MSATs at the project level, it is possible to qualitatively assess the levels of future MSAT emissions under the projects. Although a qualitative analysis cannot identify and measure health impacts from MSATs, it can give a basis for identifying and comparing the potential differences among MSAT

emissions, if any, from the project alternatives. Based on the FHWA MSAT analysis guidance (Federal Highway Administration, Memorandum: Interim Guidance on Air Toxics Analysis in NEPA Documents, September 30, 2009) this project would be considered as a project with potential low differences in MSAT effects among project alternatives.

The amount of MSATs emitted would be proportional to the Average Daily Traffic (ADTs), assuming that other variables such as fleet mix and lengths of the project are the same alternative. As indicated in Table 18 below and Table 19 on the following page, the overall projected ADTs for the intersections in the vicinity of the proposed project and I-405 are expected to decrease between the Build and No-Build Alternatives on the intersection(s) and mainline.

Table 18. Average Daily Traffic for Alternative 1: No Build

Location	2007			2014			2035		
	AM	PM	ADT	AM	PM	ADT	AM	PM	ADT
1 NB Rte. 405 collector-distributor	3,622	2,449	34,786	3,884	2,626	37,296	4,787	3,237	45,964
2 NB off-ramp to Century Blvd.	1,531	939	16,118	1,642	1,007	17,281	2,024	1,242	21,297
3 NB on-ramp from EB Century Blvd.	766	857	11,426	822	919	12,251	1,014	1,133	15,099
4 NB on-ramp from WB Century Blvd.	633	409	6,325	679	439	6,782	837	542	8,359
5 NB Rte. 405 collector-distributor/off-ramp to Manchester Blvd. and La Cienega Blvd.	2,602	2,143	34,480	2,790	2,298	36,968	3,439	2,833	45,560
6 Slip ramp between NB 405 collector-distributor and NB off-ramp to Manchester Blvd.	1,633	908	13,568	1,751	974	14,547	2,158	1,201	17,928
7 NB off-ramp to Manchester Blvd.	1,531	980	17,852	1,642	1,051	19,140	2,024	1,296	23,588
8 NB on-ramp from EB Manchester Blvd.	582	449	6,223	624	482	6,672	770	595	8,223
9 NB on-ramp from WB Manchester Blvd.	1,021	623	10,201	1,095	668	10,937	1,350	824	13,479
10 SB on-ramp from La Cienega Blvd.	2,347	1,990	24,177	2,517	2,134	25,922	3,102	2,630	31,947
11 SB on-ramp from La Cienega Blvd./Olive Ave.	1,010	1,072	15,404	1,083	1,150	16,516	1,335	1,418	20,355
12 SB Rte. 405 collector-distributor	1,123	2,092	17,342	1,205	2,243	18,593	1,486	2,765	22,914
13 SB off-ramp to WB Century Blvd.	847	715	15,098	909	767	16,188	1,121	946	19,950
14 SB on-ramp from WB Century Blvd.	378	470	4,795	406	504	5,141	501	622	6,336
15 SB off-ramp to EB Century Blvd.	225	480	4,183	242	515	4,485	299	635	5,528
16 SB on-ramp from EB Century Blvd.	562	725	10,099	603	778	10,828	744	959	13,345
17 SB on-ramp from Arbor Vitae St.	0	0	0	0	0	0	0	0	0
18 NB off-ramp to Arbor Vitae St.	0	0	0	0	0	0	0	0	0
19 SB Route 405 (N/O Jct Rte. 105)	8,161	9,691	158,626	8,566	10,172	169,155	9,934	11,797	196,083
20 NB Route 405 (N/O Jct Rte. 105)	11,120	10,201	158,626	11,677	10,708	169,155	13,559	12,418	196,083
21 SB Route 405 (N/O Century Blvd.)	7,957	9,589	155,566	8,363	10,071	166,479	9,731	11,695	192,979
22 NB Route 405 (N/O Century Blvd.)	10,916	9,997	155,566	11,446	10,505	166,479	13,242	12,215	192,979

ADT = Average Daily Traffic for 2007 (Existing), 2014 (Operational Year), and Horizon Year (2035)

Source: Caltrans District 7 Office of Freeway Operations

Table 19. Average Daily Traffic for Alternative 2: New South Half Interchange

Location	2007			2014			2035		
	AM	PM	ADT	AM	PM	ADT	AM	PM	ADT
1 NB Rte. 405 collector-distributor	3,622	2,449	34,786	3,813	2,576	36,508	4,454	3,003	42,321
2 NB off-ramp to Century Blvd.	1,531	939	16,118	1,237	732	15,169	1,217	714	13,090
3 NB on-ramp from EB Century Blvd.	766	857	11,426	860	883	11,981	1,161	977	13,862
4 NB on-ramp from WB Century Blvd.	633	409	6,325	621	446	6,656	595	567	7,767
5 NB Rte. 405 collector-distributor/off-ramp to Manchester Blvd. and La Cienega Blvd.	2,602	2,143	34,480	2,950	2,129	36,415	4,049	2,129	42,863
6 Slip ramp between NB 405 collector-distributor and NB off-ramp to Manchester Blvd.	1,633	908	13,568	1,586	883	13,174	1,475	824	12,240
7 NB off-ramp to Manchester Blvd.	1,531	980	17,852	1,237	761	15,068	795	394	8,072
8 NB on-ramp from EB Manchester Blvd.	582	449	6,223	621	458	6,526	749	493	7,553
9 NB on-ramp from WB Manchester Blvd.	1,021	623	10,201	1,063	667	10,708	1,029	813	12,418
10 SB on-ramp from La Cienega Blvd.	2,347	1,990	24,177	2,463	2,089	25,366	2,857	2,422	29,385
11 SB on-ramp from La Cienega Blvd./Olive Ave.	1,010	1,072	15,404	791	811	11,975	549	485	8,155
12 SB Rte. 405 collector-distributor	1,123	2,092	17,342	943	1,716	14,740	432	647	7,354
13 SB off-ramp to WB Century Blvd.	847	715	15,098	979	1,207	15,433	1,392	2,731	16,714
14 SB on-ramp from WB Century Blvd.	378	470	4,795	456	466	3,721	382	218	3,659
15 SB off-ramp to EB Century Blvd.	225	480	4,183	237	505	4,299	281	591	4,727
16 SB on-ramp from EB Century Blvd.	562	725	10,099	446	548	7,848	351	379	5,399
17 SB on-ramp from Arbor Vitae St.	0	0	0	578	659	8,376	1,374	1,586	20,097
18 NB off-ramp to Arbor Vitae St.	0	0	0	761	524	8,943	1,796	1,290	21,017
19 SB Route 405 (N/O Jct Rte. 105)	8,161	9,691	158,626	8,566	10,172	169,155	9,934	11,797	196,083
20 NB Route 405 (N/O Jct Rte. 105)	11,120	10,201	158,626	1,167	10,708	169,155	133,559	12,418	196,083
21 SB Route 405 (N/O Century Blvd.)	7,957	9,589	155,566	8,363	10,071	166,479	9,731	11,695	192,979
22 NB Route 405 (N/O Century Blvd.)	10,916	9,997	155,566	11,446	10,505	166,479	13,242	12,215	192,979

ADT = Average Daily Traffic for 2007 (Existing), 2014 (Operational Year), and Horizon Year (2035)

Source: Caltrans District 7 Office of Freeway Operations

Relieving congestion by enhancing operations and improving travel times along I-405 and the intersections within and adjacent to the Project Study Area will lead to an overall reduction in greenhouse gas emissions. The Traffic Management Plan protocols developed during the Project Approval and Environmental Document and Construction Phases of this project will aid in reducing construction-related traffic delays. The project's beneficial effect on traffic, vehicle miles traveled and delay time will improve mobility and safety and reduce carbon dioxide emissions.

Build Alternative 2 proposed to construct a New South Half Interchange at Arbor Vitae Street and I-405. The projected traffic volumes at the Arbor Vitae Intersections will increase. Due to an anticipated redistribution of traffic utilizing the Arbor Vitae New South Half Interchange, however, future traffic volumes at surrounding intersections are projected to decrease. The projected overall volumes are expected to decrease with the Build Alternative when compared to the No-Build Alternative. Also, it is expected that there would be low to no appreciable difference in overall MSAT emissions among the various alternatives. Based on the reduction in the projected overall traffic volumes with the Build Alternative, it is anticipated that the overall MSAT emissions would also decrease. In addition, regardless of the alternative identified, emissions will likely be lower than present levels in the design year as a result of EPA's and California's control programs that are projected to reduce MSAT emissions by at least 57 to 87 percent from 2000 to 2020. Local conditions may differ from these national projections in terms of fleet mix and turnover, ADT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future in virtually all locations.

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 designated as a toxic air contaminant by the CARB in 1986. All types of asbestos are hazardous and may cause lung disease and cancer.

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. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed.

Serpentinite may contain chrysotile asbestos, especially near fault zones. Ultramafic rock, a rock closely related to serpentinite, may also contain asbestos minerals. Asbestos can also be associated with other rock types in California, though much less frequently than serpentinite and/or ultramafic rock. Serpentinite and/or ultramafic rock are known to be present in 44 of California's 58 counties. These rocks are particularly abundant in the counties of the Sierra Nevada foothills, the Klamath Mountains, and Coast Ranges. 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 designated 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; hence, it is not found in the Project Study Area. Therefore, no potential impacts from naturally occurring asbestos during project construction would occur.

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 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

Concluding Comments About Air Quality. This project-level Air Quality Report addresses all pertinent aspects of conformity and adheres to the Transportation Conformity Rule. The proposed project is listed and fully funded in the FHWA approved 2008 RTP and the 2008 RTIP. The project will be removed from upcoming RTPs and RTIP as No-Build Alternative 1 has been identified as the Preferred Alternative. The design, concept, and scope of the project have not changed significantly and the project is not likely to result in adverse impact on the ambient air quality in the project vicinity. Based on the most recent 3-years of CO data at the Los Angeles – Westchester Parkway air monitoring station, it is unlikely that the proposed project will contribute to the ambient CO level to violate National Ambient Air Quality Standards (NAAQS). No avoidance, minimization and/or mitigation measures are proposed for No-Build Alternative 1 since there will be no impacts on air quality.

The proposed project is located in Los Angeles County, a federally designated nonattainment area for both PM_{2.5} and PM₁₀; therefore, a PM project-level hot-spot analysis is required. On July 22, 2008, the SCAG TCWG concurred that this project would not be a POAQC for PM_{2.5} and PM₁₀. It was determined that this project met the conformity requirements for PM_{2.5} and PM₁₀ without a qualitative analysis and in accordance with the March 10, 2006 Final Rule. A discussion of fugitive dust control measures is provided, and it is recommended that the measure be included as project commitments prior to construction. The activities of the proposed project are not expected to cause any new violations, worsen existing violations, or delay timely attainment of the NAAQS. The analysis shows that MSAT emissions in the project area will decrease in future years and that the project would result in a decrease in MSAT emissions compared to no project conditions. Control measures have been designated for naturally occurring asbestos should rock containing asbestos be uncovered.

The proposed but rejected project was partially funded and is in the Southern California Association of Governments 2008 Regional Transportation Plan (RTP), which was found to conform by the Southern California Association of Governments (SCAG) on May 8, 2008 and FHWA and FTA adopted the air quality conformity finding on June 5, 2008. The project is also included in the SCAG's 2008 Regional Transportation Improvement Program (RTIP), page 29. The 2008 RTIP was approved by the FHWA and the FTA on January 14, 2009. An additional \$37 million was needed to construct this project. The design, concept, and scope of the proposed project is not consistent with the project description in 2008 RTP, the 2008 RTIP and assumptions in the SCAG's regional emissions analysis as No-Build Alternative 1 has been identified as the Preferred Alternative.

An Air Quality Conformity Report (AQCR) will not be prepared since the No-Build Alternative 1 has been identified as the Preferred Alternative. There would be no construction with this alternative. The No-Build Alternative 1 is deemed exempt pursuant to 40 CFR 93.126 under "Other – Specific activities which do not involve or lead directly to construction, such as: Planning and technical studies." As a result, Alternative 1, or the No-Build Alternative, is exempt from the requirement to determine air quality conformity. There will be no potential for Air Quality Impacts.

2.2.7 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.

National Environmental Policy Act and 23 CFR 772

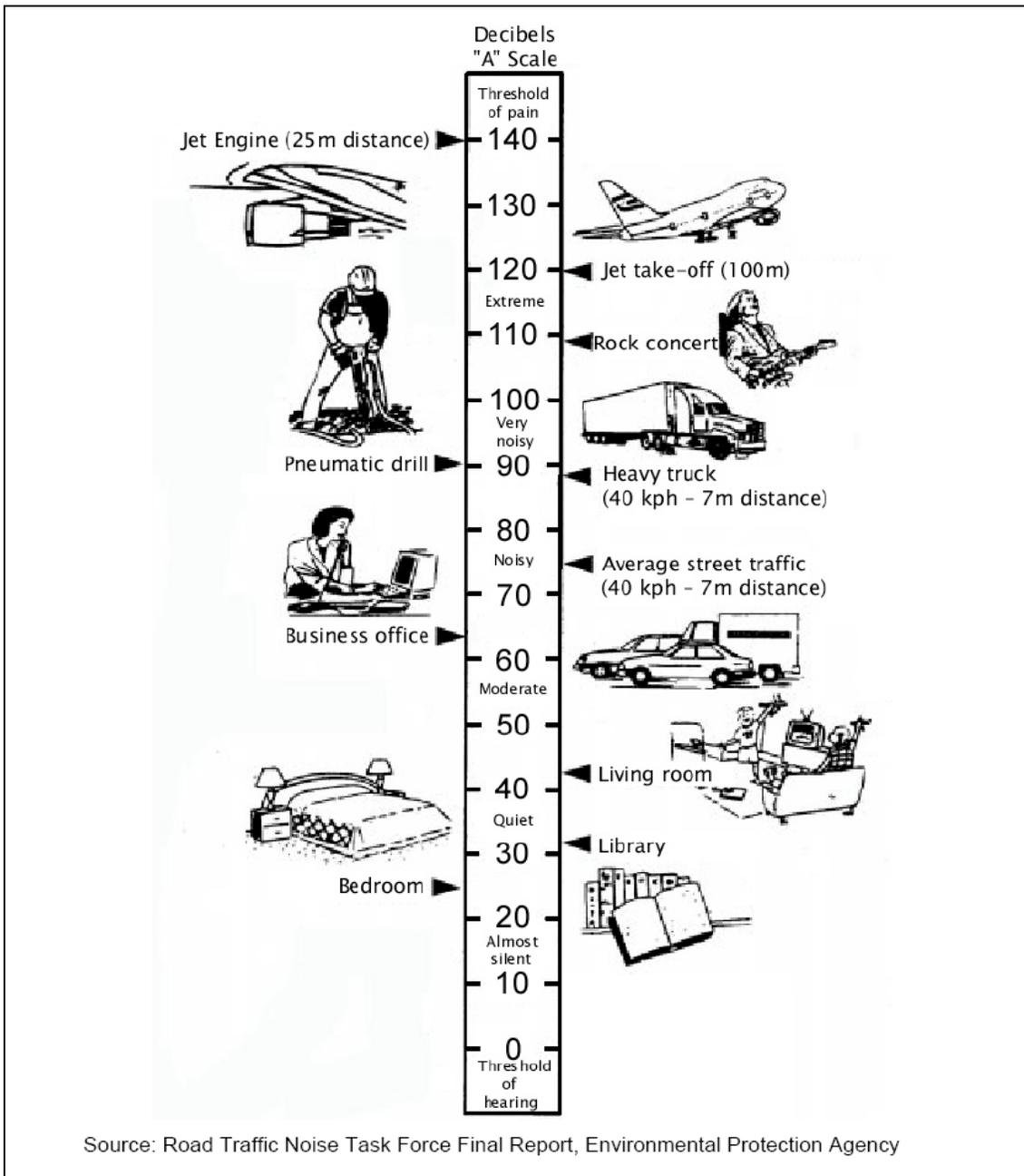
For highway transportation projects with FHWA (and Caltrans, as assigned) involvement, the Federal-Aid Highway Act of 1970 and the associated implementing regulations (23 CFR 772) govern the analysis and abatement of traffic noise impacts. The regulations require that potential noise impacts in areas of frequent human use be identified during the planning and design of a highway project. The regulations contain Noise Abatement Criteria (NAC) that is 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). Table 20 on the following page lists the noise abatement criteria for use in the NEPA-23 CFR 772 analysis.

Table 20. Noise Abatement Criteria for Use in the NEPA-23 CFR 772 Analysis

Activity Category	NAC $L_{eg(h)}$ dBA	Mazimum Noise Level 15m (50 ft) distance
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	67-Exterior	Picnic areas, recreations areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.
C	72-Exterior	Developed lands, properties of activities not included in Categories A or B above.
D	---	Undeveloped lands.
E	52-Interior	Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.

Figure 2-20 on the following page lists the noise levels of common activities to enable readers to compare the actual and predicted highway noise-levels discussed in this section with common activities.

Figure 2-20. Noise Levels of Common Activities



In accordance with the Caltrans' *Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects, August 2006* (TNAP), a noise impact occurs when the future noise level with the project results in a substantial increase in 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.

Caltrans' *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 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, the absolute noise level, build versus existing noise, environmental impacts of abatement, public and local agencies input, newly constructed development versus development pre-dating 1978 and the cost per benefited residence.

Study Methods and Procedures

Selection of Receivers and Measurement Sites. Noise sensitive receivers in the project area that are subject to traffic noise impacts from freeway-generated noise were identified. Noise sensitive areas typically include residences, schools, libraries, churches and temples, hospitals, recreation and sport areas, playgrounds, hotels, motels and parks.

For this project, Caltrans Noise and Vibration Investigation Branch personnel performed a field survey of the entire area within the limits of the project. The survey included visiting the project sites in order to identify land uses within the project limits and to select the noise measurement sites. The entire area within the project limits was acoustically represented by 12 noise measurement site locations and modeled at one location. The noise measurement sites were identified taking into consideration the following general site requirements:

- 1) Sites were acoustically representative of areas and conditions of interest. They were located at areas of human use.
- 2) Sites were clear of major obstructions between source and receiver. Microphone positions were more than 9 feet away from reflecting surfaces.
- 3) 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.
- 4) Sites were not exposed to prevailing meteorological conditions that are beyond the constraints discussed in the Technical Noise Supplement.

The Interstate 405 Corridor already exceeds the Noise Abatement Criteria (NAC), so no noise readings or any long-term noise modeling will be conducted outside of the Project Study Area.

Measurement of Existing Noise Levels. The existing noise environment in the project area was determined by performing short-term (10-minute) and long-term (24-hour) noise monitoring. 24-hour readings were taken at locations representative of residential area within an interchange in order to determine the noisiest hour. Sound level meters were placed at two representative sites (See Table 21 Traffic Noise Measurement and Modeling Results) and were left to run continuously monitoring and recording noise levels for a 24-hour period. The short-term noise levels were recorded within each 24-hour noise monitoring for that particular area. The noise level data collected was then analyzed and adjusted using the 24-hour noise readings to determine the noisiest hour.

Additionally, two community background noise readings were taken within the project limits. Background noise is the total of all noise generated within the community and is measured away from the freeway where freeway traffic noise does not contribute to the total noise level. Background noise levels are typically measured to determine the feasibility (noise reducibility of 5 dBA) of noise abatement and to insure that noise reduction goals can be achieved. The community background noise limits within the construction limits of the project ranged from 53 to 58 dBA. Noise abatement cannot reduce noise levels below background noise levels.

Short-term noise readings were taken from 03/08/2006 to 03/13/2006 between the hours of 9:55 a.m. and 1:15 p.m., using Metrosonics Model MS3080 sound level meter (serial numbers 3120, 3193 and 3194) placed 5 feet above the ground on a tripod. Measurements were taken for periods of 10 minutes at each location. The short-term monitoring locations are shown in Layouts L-1 through L-3 and Attachments 1 and 2. Long-term noise readings were taken from 3/08/2006 to 3/13/2006 using Medtronics MS3080 sound level (serial numbers 3126 and 3127) place 5 feet above the ground on a tripod. Measurements were taken for 24-hours or more at each location.

During the short-term measurements, Caltrans staff attended the sound-level meter. All readings were recorded only if no significant sound level contamination from sources other than the freeway traffic were present. The noise levels measured during the measurement period were logged in the sound level meter's memory and later downloaded to a personal computer and printed out.

The calibration of the meters was checked before and after the field measurements using the Metrosonics CL 304 calibrators (CL304-7456, CL304-7457, CL304-7458, CL304-7459, and CL304-7460). It was determined that no adjustment in calibration was necessary. Wind speed was observed using a Kestrel 1000 anemometer during the short-term noise monitoring session. No noise readings were recorded when the wind speed exceeded a sustained 10 miles per hour (mph). The temperature varied from approximately 70° - 85° Fahrenheit, and winds were light, having little effect on sound propagation over moderate distances. Traffic on SR-405 near the respective noise-monitoring site was counted simultaneously when noise measurements were being recorded. Caltrans staff performed traffic counts and vehicle classifications manually. Vehicles were classified as automobiles, medium-duty trucks, heavy-duty trucks, and motorcycles. An automobile is defined as a vehicle with two axles and four tires and primarily designed to carry passengers. Small vans and light trucks are in this category as well. Medium trucks include all cargo vehicles with two axles and six tires. Heavy trucks include all vehicles with three or more axles.

Traffic speeds on I-405 were determined by traveling in the flow of traffic and by observing the vehicle speed on the speedometer. The posted speed limit on the mainline Route 405 in the project area is 65 mph.

FHWA Traffic Noise Model 2.5. The Federal Highway Administration's Traffic Noise Model (FHWA TNM) Version 2.5 is FHWA's computer program for highway traffic noise prediction and analysis. The FHWA TNM v. 2.5 computer program was used for the traffic noise analysis presented in this report. In order to develop the analytical model, all relevant topographic features, including roadway lanes, receiver locations, existing sound barriers and existing terrain in the area of potential impact, were digitized into a three-dimensional, scaled reference coordinate system for both existing and future conditions.

Calibration of Noise Model. Using the measured existing noise level data and corresponding traffic counts, the FHWA TNM Version 2.5 was calibrated as necessary in order to correctly predict noise levels at analysis locations.

Future Noise Level Prediction. Analysis based on the traffic volumes and speeds, stated in the 1997 Caltrans Highway Capacity Manual, indicates that maximum noise occurs at Level of Services (LOS) D-E at 85% of capacity and 100% of free flow speed. Using this information, it was determined that a traffic volume of 1950 vehicle/hour/lane would be the worst noise hour traffic volume under the future No-Build design-year (2036) situation. The traffic noise model was analyzed for the above-mentioned traffic volume to predict worse hour noise levels for design-year conditions. The Traffic Noise Analysis Protocol (TNAP) requires that noise level be predicted using traffic characteristics that will yield the worst hourly traffic noise impact on a regular basis for future conditions.

Identification of Traffic Noise Impacts and Noise Abatement Considerations. Results from computer analysis for future-worst-hour noise levels were used to determine if traffic noise impacts would occur. Traffic noise impacts occur when it is determined that the proposed project causes a substantial noise increase or is predicted traffic noise levels approach or exceed Noise Abatement Criteria. A noise increase is substantial when the predicted noise levels after project completion exceed existing noise levels by 12 dBA - $L_{eq}(h)$. A traffic noise also occurs when predicted noise levels after project completion approach within 1 dBA - $L_{eq}(h)$, or exceed Noise Abatement Criteria. Sound wall insertion losses were calculated using the calibrated traffic noise models developed for each analysis site. According to the protocol, a minimum of 5 dBA noise reduction (insertion loss) must be achievable at impacted receivers in order for the proposed abatement to be considered acoustically feasible. Based on the results of the analysis, preliminary noise abatement was recommended at locations where traffic noise impacts were identified and the abatement measure was found to be feasible. The reasonableness cost allowance for the acoustically feasible noise barriers was calculated following the procedure defined in the TNAP. The reasonable cost allowance is based on a base allowance of \$32,000 per benefited residence (i.e. residences that receive at least 5 dBA noise reduction for the sound wall) and additional dollars for the following factors: absolute noise levels, change in noise levels, achievable noise reduction and the date the residences were constructed.

Affected Environment

Land Use and Sensitive Areas. The existing land use within the project limits is comprised of residential, commercial and hotel/motel. Seven residential parcels consisting of 13 residential units are located within the project limits. These parcels are located south of West Arbor Vitae Street, west and east of South Ash Avenue and north of West 95th Street. Three of the parcels are three-unit residential properties and four parcels include single-family homes.

School, hotel, park, and residential properties outside of the project limits will be indirectly impacted by the construction of this project. The schools include Clyde Woolworth Elementary School, City of Honors High School, and the University of West Los Angeles. The adjacent hotels are the Crowne Plaza, Hampton Inn, Holiday Inn, Motel 6, Westin Inn, and LAX. The Motel 6 located at 5101 West Century Boulevard in the City of Inglewood has an exterior area of frequent human use. Other assorted commercial use properties border the west and southeast edge of the project limits. Many residential units are adjacent to the eastern edge of the project limits. Due to parking, walking, and recreational activities, these properties all have exterior areas of regular human use.

Ashwood Park is within a half of a mile of the eastern border of the project limits. This park is outside of the Project Study Area covered in this environmental document. Therefore, this park was not evaluated using the Traffic Noise Analysis Protocol in the Traffic Noise Study Report prepared for this project. Ashwood Park may experience temporary effects during construction in terms of associated accessibility and/or noise issues. During the construction phases of the project, noise from construction activities will temporarily and intermittently dominate the noise environment in the immediate area of construction. Construction noise is regulated by Caltrans Specifications, Section 7-1.011, "Sound Control Requirements." These requirements state that noise levels generated during construction shall comply with applicable local, state, and federal regulations that all equipment shall be fitted with adequate mufflers according to the manufacturers' specifications.

Existing Traffic Noise. The noise environment area is dominated by traffic traveling the I-405, on and off-ramps to and from the Arbor Vitae and the Century Boulevard over-crossings, and traffic noise from local streets within the construction limits of the project. No sound walls exist within the project limits. Two sound walls are proposed for noise reduction purposes as part of the I-405/Arbor Vitae New South Half Interchange Project. Sound wall SW-1 will be adjacent to northbound Route 405 from 0.1 mile north of Arbor Vitae Street to Century Boulevard along Caltrans Right of Way. Sound wall SW-2 will be adjacent to southbound I-405 from 0.15 miles

south of Arbor Vitae Street to Arbor Vitae Street along Caltrans Right of Way. For the purposes of the study, the said proposed sound walls have been analyzed as existing sound walls wherever applicable when modeling the traffic noise for this report.

Below, Table 21, Traffic Noise Measurements and Modeling Results, summarizes short-term sound level measurements taken in the project area and the noise modeling results for existing conditions. The measurements and modeling results indicate that existing traffic noise levels for the residential area typically range between 61 and 76 dBA - L_{eq}(h). The 24-hour noise readings were taken at Sites N3A and N3B. For both of these sites, which represents the area between Century Boulevard and Arbor Vitae Street over-crossing, the existing worst-hour noise level was measured to be 69.5 dBA - L_{eq}(h) between 12:37 p.m. and 1:37 p.m. Background noise levels measured at two locations ranged from 53 to 58 dBA - L_{eq}(h).

Table 21. Traffic Noise Measurement and Modeling Results

Table 3. Traffic Noise Measurements & Modeling Results											
Receiver	Location	Type of Development	Noise Abatement Category dBA - Leq[H]	Field-Measured Noise Level dBA - Leq[H]	Modeled Noise Level dBA - Leq[H]	Traffic Noise Model Calibration dBA - Leq[H]	Existing Worst-Noise-Hour Noise Level dBA - Leq[H] m-modeled f-measured d=24-hour reading		Predicted Worst-Noise-Hour Noise Level dBA - Leq[H]	Predicted Noise Level Increase dBA - Leq[H]	Impact Type E=Exceed A=Approach
SITE N1	5101 W Century Blvd.	Motel	B (67 dBA)	66	70, 61**	4	67	f	62**	-	None
SITE N1A***	5101 W Century Blvd.	residential	B (67 dBA)	48			49	f			None
SITE N2	9825 Redfern Ave.	residential	B (67 dBA)	61	64	3	63	f	64	1	None
SITE N3	9732 Oceangate Ave.	residential	B (67 dBA)	67	68	1	69	f	69	0	E
SITE N4	9618 Oceangate Ave.	residential	B (67 dBA)	68	66	-2	68	f	69	1	E
SITE N5	9510 Oceangate Ave.	residential	B (67 dBA)	64	64	0	66	f	66	0	A
SITE N6	704 Arbor Vita Ave.	residential	B (67 dBA)	76	74	-2	76	f	-		
SITE N6A	Model site	residential	B (67 dBA)	-	66	-2		m	72	-	E
SITE S1	5209 94th St.	residential	B (67 dBA)	67	66, 63**	-1	68	f	67**	-	E
SITE S2	5200 Pardee St.	residential	B (67 dBA)	64	64, 59**	0	65	f	62**	-	None
SITE N8*	444 Bckthorn St.	residential	B (67 dBA)	58	NONE			f			
SITE N9*	4928 96th St.	residential	B (67 dBA)	53	NONE			f			
S N3A****	9732 Oceangate Ave.	residential	B (67 dBA)	70				d			
S N3B****	9732 Oceangate Ave.	residential	B (67 dBA)	70				d			
*Community Noise Background Level											
** Modeled Noise Level with Local Traffic Filtered Out											
*** Interior Noise Reading											
S N3A**** 24 hour Noise Reading on 03/08/06											
S N3B**** 24 hour Noise Reading on 03/13/06											

Potential Impacts

Future Noise Environment. Future noise levels were predicted using traffic characteristics that yield the worst hourly traffic noise impact on a regular basis. As previously described, 1950 vehicles per hour per lane at 65 mph for the year 2036 were used as the future traffic volume. The percentages of cars, medium trucks, and heavy trucks use for modeling the present were assumed to remain the same in the future as of today. Predicted increases in traffic noise under design-year conditions relative to existing conditions typically are in the range of 0 - 1dBA. These increases are attributed to the addition of the proposed two mixed flow lanes and the consequential increases in traffic volumes.

Traffic Noise Environment. The Traffic Noise Measurements and Modeling Results Table 21 shows the predicted traffic noise levels approach/exceed the Noise Abatement Criteria (NAC) of 67 dBA - Leq(h) for Activity Category B. The Activity Category B land uses within the project limits including residential properties and the Motel 6, Site N1, adjacent to the southeastern corner of the project limits. It was predicted that the future Route 405 New South Half Interchange Improvement project would impact the residential areas adjacent to the northbound 405 freeway. Based on predicted noise levels, the Motel 6 (N1) adjacent to the project limits will not face substantial freeway traffic noise impact as its Field-Measured Noise Level (66 dBA - Leq(h)) will not be raised substantially with the Modeled Noise Level (61 dBA - Leq(h)) and the Predicted Worst-Hour-Noise Level (62 dBA - Leq(h)) when the local traffic is filtered out. The noise level is substantially higher (70 dBA - Leq(h)) without the local traffic being filtered out. Nearby businesses that are included in Activity Category C include commercial businesses that have exterior frequent human use and therefore were considered for potential freeway traffic noise impacts.

For Alternative 2, it was predicted that the future construction of the new south half interchange consisting of the northbound Interstate 405 off-ramp to Arbor Vitae Street and southbound I-405 onramp to Arbor Vitae Street would impact all residential areas represented by Sites N3, N4, N5, N6A and S1 along northbound and southbound I-405. The residential area represented by Site S2 along southbound I-405 is not impacted by freeway traffic noise from this new south half interchange project. A motel development within the project limits has an exterior area of frequent human use. No traffic noise has been predicted at this motel, 62 dBA - Leq(h), as the future predicted noise level is below the state/federal criteria at this location. Therefore, no noise abatement has been considered for this motel. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Noise Impacts.

Abatement

Preliminary Noise Abatement Analysis. FHWA regulations (23CFR772) state that noise abatement will usually be necessary where noise impacts are predicted, only where frequent human use occurs, and where a lowered noise level would be of benefit. As a matter of practice, abatement is considered for places where people are exposed to highway noise for at least 1 hour on a regular basis. Potential noise abatement measures include:

- Avoiding the project impact by using design alternatives, such as altering the horizontal and vertical alignment of the project.
- Constructing noise barriers
- Acquiring property to serve as a buffer zone
- Using traffic management measures to regulate types of vehicles and speed
- Acoustically insulating public use or nonprofit institutional structures

Caltrans has prepared a Noise Abatement Decision Report (NADR), in consideration of the topography, land use, right-of-way, and existing traffic. It has been determined that construction of sound walls would be the appropriate form of noise abatement measure for the impacted area within the project limits. Sound walls have been considered and/or recommended at the following locations for various activity categories within the project limits.

Residential Areas. The impacted residential areas have been considered for noise abatement. They are represented by the following sites: N3, N4, N5, and N6A located east of the Interstate 405 freeway and Site S1 located west of the Interstate 405 freeway. Sites N3, N4, N6A, and S1 are considered impacted because the predicted traffic noise levels exceed the Noise Abatement Criteria (NAC) of 67 dBA - Leq(h). Site N5 is also impacted because the predicted traffic noise level approaches the NAC of 67 dBA - Leq(h). Sound wall SW-1 will provide 5-10 dBA noise reduction for the residential areas represented by Sites N3, N4, N5, and N6A. Sound wall SW-2 provides 5 dBA noise reduction for the residential area represented by Site S1. Both sound walls been proposed along state-owned right of way. All impacted residential areas considered for

abatement are listed in the Traffic Noise Measurements and Modeling Results Table 21 on two pages previous.

Hotels/Motels. The Motel 6 is represented by Site N1 located adjacent to the project limits. No noise impacts were identified at this location. In addition, a Modeled Noise Level Site N1 located at the pool (an area of frequent human use) in the motel's property did not indicate any noise impacted from predicted noise levels. The other adjacent hotels are the Crowne Plaza, Hampton Inn, Holiday Inn, Westin Inn, and LAX.

Schools. Schools located outside of the project limits will be indirectly impacted by the construction of this project. These include Clyde Woolworth Elementary School, City of Honors High School, and the University of West Los Angeles.

Parks. One park located outside of the project will be indirectly impacted by the construction of this project. Ashwood Park is within a half of a mile of the eastern border of the project limits.

Commercial and Industrial Developments. There are several commercial developments and parking structures within the project limits. In addition, as mentioned previously in the report, there is a motel development adjacent to the southeastern corner of the project limits that has an exterior area of frequent human use. No traffic noise impact has been predicted at this motel as the future predicted noise level is below the state/federal criteria at this location. Therefore, no noise abatement has been considered for this motel.

Undeveloped Lands. There are no undeveloped land parcels within the Project Study Area.

Noise Abatement Feasibility and Reasonable Cost Allowances. The recommended sound walls considered for noise reduction have been analyzed for feasibility based on the achievable noise reduction. The insertion loss for the considered sound wall SW-1 is 9 decibels (dBA) and therefore acoustically feasible. The insertion loss for the considered sound wall SW-2 is 5 decibels (dBA) and is also acoustically feasible. These two sound walls were further evaluated to estimate the reasonable cost-allowance required to determine the overall reasonableness.

For any sound wall to be considered reasonable from a cost perspective, the total estimated cost of the sound wall must be equal to or below the total cost-allowance calculated for that wall. The cost calculations of the sound wall should include all items appropriate and necessary for the construction of the sound wall, such as traffic control, drainage modification, and retaining walls. Preliminary information on the physical characteristics of potential abatement measures (such as physical location, length, and height of sound walls) has been evaluated. The final design must meet the requirements of Chapter 1100 of the Highway Design Manual. In particular, the minimum and maximum height requirements must be in accordance with Section 1102.3 of the manual.

Based on the studies performed, Caltrans intends to incorporate noise abatement measures in the form of sound walls with the aforementioned lengths and average heights of 14 feet before all other construction activities are begun. Sound walls now exist on both the west and east sides of Interstate 405 north of the Arbor Vitae Street Overcrossing. The following is a discussion on recommended noise abatement.

Proposed Acoustically Feasible Sound Wall for Build Alternative:

Northbound I-405

Sound wall SW-1 provides 5-10 decibels (dBA) noise reduction for the residential areas represented by Sites N3, N4, N5 and N6A. The proposed sound wall will be built along state-owned right of way.

Southbound I-405

Sound wall SW-2 provides 5 dBA noise reduction for the site represented by Site S1. The proposed sound wall will be built along state-owned right of way.

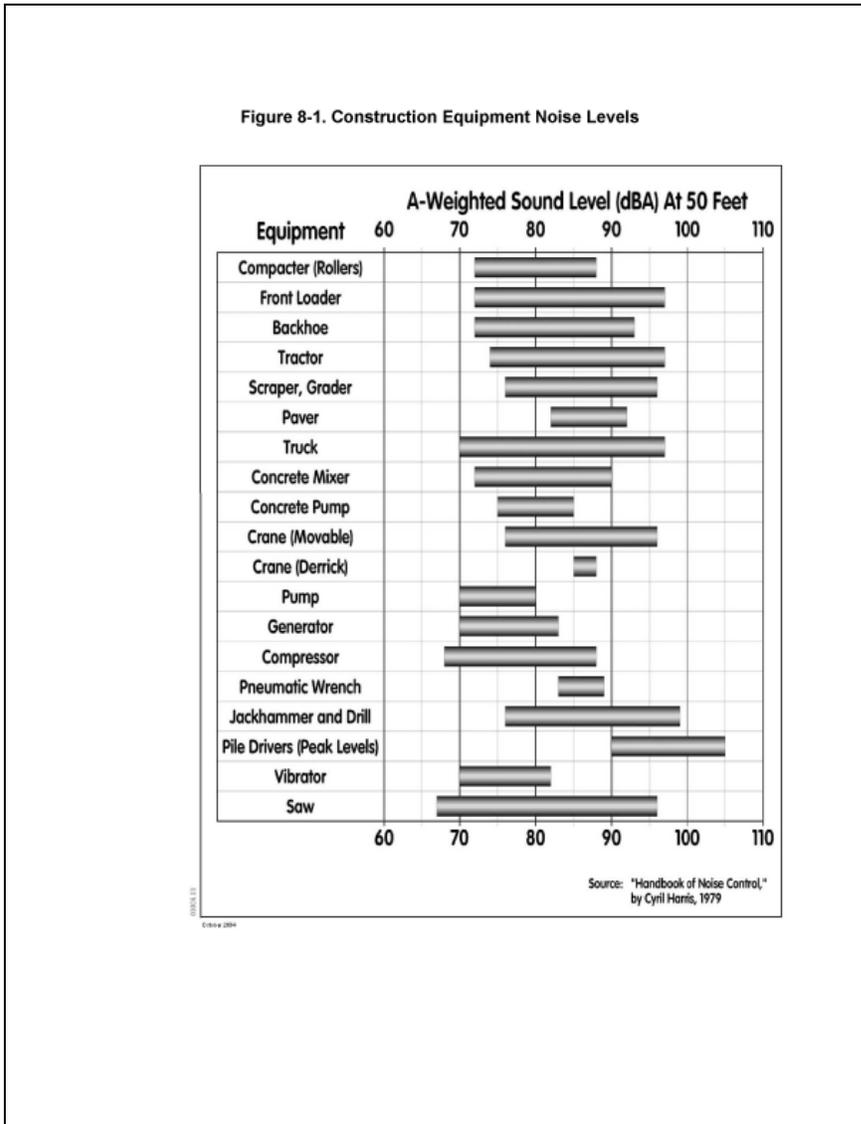
Based on the studies completed to date, Caltrans intends to incorporate noise abatement in the form of barriers at: northbound I-405 and southbound I-405, with a length and average height of 2,445 feet and 14 feet for Sound Wall SW-1 and 814 feet and 14 feet for Sound Wall SW-2. Calculations based on preliminary design data indicate that the barriers will reduce noise levels by 5 to 10 dBA for many residences at a cost to be determined. If during final design conditions have substantially changed, noise abatement may not be necessary. The final decision of the noise abatement will be made upon completion of the project design and the public involvement processes.

Construction Noise. 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 7-1.011, Sound Control Requirements (7). These requirements state that noise levels generated during construction shall comply with applicable local, state, and federal regulations and that all equipment shall be fitted with adequate mufflers according to the manufacturers' specifications.

Table 22 on the next page 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. No adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans standard specifications and would be short-term, intermittent, and dominated by local traffic noise. Implementing the following measures would minimize temporary construction noise impacts:

- All equipment shall have sound-control devices no less effective than those provided on the original equipment. No equipment shall have an unmuffled exhaust.
- No pile driving, jackhammer and drill or trucks using backup beepers shall be permitted during nighttime hours (9pm to 7am) to minimize disturbance for neighboring residents. As an alternative to pile driving, please use cast and drill hole method during nighttime hours.
- The "backing-up beeping alarm" of trucks be minimized to the maximum extent or eliminated altogether during nighttime hours (9pm to 7am).
- Simultaneous equipment idling noise needs to be minimized to reduce the cumulative construction noise.
- The two proposed sound walls needs to be constructed before all other construction activities begin.
- Caltrans will make it clear to the public during construction that if they feel that the noise levels are excessive, the agency will take noise readings during construction to ensure that noise levels do not exceed 86 dBA at homes located 50 or more feet from the construction zone.
- Caltrans will take action to ensure that noise levels just below 86 dBA will not remain constant.
- As directed by the Engineer, the contractor shall implement appropriate additional noise mitigation measures including, but not limited to, changing the location of stationary construction equipment, turning off idling equipment, rescheduling construction activity, notifying adjacent residents in advance of construction work, or installing acoustic barriers around stationary construction noise sources.

Table 22. Construction Equipment Noise Levels



Concluding Comments about Noise. Existing noise levels were recorded at 13 locations and modeled at 1 location that represented the noise sensitive area along the eastern edge of Interstate 405 within the project limits. The existing noise levels recorded at various residences ranged between 61 and 76 decibels (dBA). The future predicted worst hour noise levels for these locations were calculated using The Federal Highway Administration’s Traffic Noise Model (FHWA TNM) Version 2.5.

The future noise levels after the completion of the project are expected to increase by 1 dBA. Several areas of land use category B have been identified as being impacted by freeway noise. Noise reduction measures in the form of sound walls have been recommended for the impacted areas. Two sound walls have been proposed. Sound wall SW-1 with a height of 14 feet and length of 2,445 feet will provide 5-10 dBA noise reduction for the residential areas represented by Sites N3, N4, N5, (residential sites) and N6A (model site) east of Interstate 405. Sound wall SW-2 with a height of 14 feet and length of 814 feet will provide 5 dBA of noise reduction for the site represented by Site S1 (residential) west of Interstate 405. The Caltrans Noise Decision Abatement Report (NADR) will be available for review at a date to be determined.

A noise increase is substantial when the predicted noise levels after project completion exceed existing noise levels by 12 dBA - $L_{eq}(h)$. This will not occur with Build Alternative 2 of the Proposed but Rejected New South Half Interchange Project. None of the future noise levels with the Build Alternative would have exceeded existing noise levels more than 5 dBA - $L_{eq}(h)$, the result for the Model Site N6A. Sites N3 and S1 will exceed existing noise levels by 1 dBA - $L_{eq}(h)$ in the Model Noise Level versus the Field-Measured Noise Level. Site N4 will exceed Existing Worst-Hour Noise Level by 1 dBA - $L_{eq}(h)$ in the Predicted Worst-Hour Noise Level after the construction of the Proposed but Rejected Build Alternative. No avoidance, minimization and/or mitigation measures are proposed for No Build Alternative 1 since there will be no impacts on noise and vibration.

2.3 BIOLOGICAL ENVIRONMENT

The Biological Environment section of the EA is broken into the following subsections:

- Natural Communities
- Wetlands and Other Waters
- Plant Species
- Animal Species
- Threatened and Endangered Species
- Invasive Species

General Description of the Existing and Physical Conditions

Study Area. The study area has Interstate 405 in the center and extends roughly from Century Boulevard in the south to Arbor Vitae Street in the north, and extends west to La Cienega Boulevard and east to South Ash and South Ocean Gate Avenues, in the City of Inglewood Los Angeles County. The project's study area does not include any water bodies, wetlands or sensitive natural areas within its project limits. The Pacific Ocean is nearly four miles to the west and thirteen miles to the south. The Los Angeles River is over seven miles to the East. Also, the study area is heavily urbanized as is the surrounding communities. Current land uses consist of residential, commercial, industrial, and office within the project's study area.

Biological Conditions in the Biological Study Area (BSA). The surveyed BSA for this project is made up of no natural community habitats of concern or value. A variety of mature highway landscape trees and shrubs exist within the BSA along the western and eastern edges of Interstate 405 made up of ruderal and non-native vegetation.

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. 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. The environmental setting is urbanized or disturbed with no native biological resources within the project limits or directly adjacent to the project limits. Also, there are no sensitive species or habitats within or directly adjacent to the project limits. The plant species that were identified in the project area are listed later in this chapter in subsection 2.3.3 Plant Species.

The only animals and/or evidence of animals noted during field surveys were species common to urban development.

Biological Study. The basis for this biological discussion is the project's Natural Environmental Study Report (NESR), dated November 8, 2007.

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. 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. This includes 4.258 acres of trees and brush.

Crows (*Corvus corvidae*) and Mourning Dove (*Zenaida macroura*) were observed within the Project Study Area. These species are common to urban development.

Affected Environment

Natural Communities of Special Concern. The environmental setting is urbanized or disturbed with no native biological resources within the project limits or directly adjacent to the project limits. Again, there are no sensitive species or habitats within or directly adjacent to the project limits.

The project's setting consists almost entirely of non-native landscape plants. No natural plant habitat of value or concern exists within the project limits. A variety of mature highway landscape trees and shrubs consisting of the nine species including Eucalyptus and Southern Magnolia exist within the project site.

The site was evaluated for value as wildlife habitat. The only animals and/or evidence of animals noted during field surveys were species common to urban development. Crows and Mourning Dove were observed within the project site. The project area provides extremely poor habitat to most wildlife species because it is void of native vegetation, and is highly disturbed from human activity and is adjacent to heavy urban development. Homeless encampments are present on the project site.

Oak woodlands are an important biological resource in California that provide habitat for numerous wildlife species. These trees provide shelter and nesting sites for birds and mammals, basking sites for lizards, food source for numerous species, as well as a shade source for creeks and streams which influences water temperatures and hydrology patterns. Oaks also filter pollution, decrease erosion and create oxygen and remove carbon dioxide from the atmosphere.

Potential Impacts

Project Impacts. For Alternative 2, the impacts are minimal to biological resources due to the limits of the project's study area and its urbanized, built out setting. Removal of non-native vegetation will occur with this project. Also, no oak trees within the Project Study Area will be removed as part of the I-405/Arbor Vitae New South Half Interchange Project. No impacts will occur to drainages or 'Waters of the United States.' No state or federally listed threatened/endangered species will be impacted by this project. In addition, no indirect impacts from noise to nesting birds or other biological resources will result from this project. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Natural Communities Impacts.

Cumulative Impacts. Impacts from Built Alternative 2 to the non-native vegetation along Interstate 405 would have been limited to within the Project Study Area. A large number of mature trees are likely to be removed; a pre-construction survey will determine if mitigation measures are needed.

Avoidance, Minimization, and/or Mitigation Measures

Avoidance and Minimization Efforts. For Alternative 2, clearing and grubbing of vegetation should be performed between September 1 and the end of February, to minimize impacts to nesting birds. Because a large number of mature trees are likely to be removed, a pre-construction survey must be performed if clearing and grubbing can not occur during this period. The result of the pre-construction survey will determine if mitigation measures are needed. The contractor will follow all pollution and litter laws and regulation.

Oak Woodland Replacement. California is losing its oak woodlands at an alarming rate to land development and conversion to agriculture. Since 1945 over one million acres of oak woodland has been lost in California. A 2001 estimate shows the 30,000 acres of oaks per year are lost statewide, compared to only 60,000 acres for an entire decade in the mid-1980's to mid-1990's. Southern oak woodlands once covered much of the foothills and plains of the Southern California ecoregion and the Los Angeles Basin was once noted for their vast savannas of coast live oak, and valley oak. Today, more than 85 percent of coastal sage scrub communities, which include oak woodlands, have been lost to urban and agricultural development. The vast majority of oak savannas in the Southern California region have been destroyed.

As noted on the prior page, no oak trees within the Project Study Area will be removed as part of the I-405/Arbor Vitae New South Half Interchange Project. However, should the removal of oak trees be necessary due to the 405/101 Interchange Project, the loss will be mitigated offsite through replacement planting. Based on the total amount of oak trees impacted and available On-site locations, favorable areas within the right of way will be identified by the District Biologist and Landscape Architect. Any required replacement beyond the space available in the right of way will be planted Off-site in coordination with an agency or organization that has yet to be determined.

California Senate Resolution No. 17-Relative to Oaks, adopted by the California Legislature, requests that state agencies assess their impacts to oak woodlands containing blue, Engleman, valley or coast live oak species and to preserve and protect to the maximum extent feasible or provide replacement plantings when these species are removed. By offsetting the impacts to oak woodlands as described above, Caltrans will also conform to the spirit of Senate Concurrent Resolution No. 17. No avoidance, minimization and/or mitigation measures are proposed for No-Build Alternative 1 since there will be no impacts on natural communities.

2.3.2 WETLANDS AND OTHER WATERS

General Regulatory Setting. Federal Requirements: Clean Water Act

In 1972, the Federal Water Pollution Control Act was amended, making the discharge of pollutants to the waters of the United States from any point source unlawful, unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. The Federal Water Pollution Control Act was subsequently amended in 1977, and was renamed the Clean Water Act (CWA). The CWA, as amended in 1987, directed that storm water discharges are point source discharges. The 1987 CWA amendment established a framework for regulating municipal and industrial storm water discharges under the NPDES program. Important CWA sections are as follows:

- Sections 303 and 304 provide for water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal project that proposes an activity, which may result in a discharge to waters of the United States to obtain certification from the State that the discharge will comply with other provisions of the act.
- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) into waters of the United States. Regional Water Quality Control

Boards (RWQCB) administer this permitting program in California. Section 402(p) establishes addresses storm water and non-storm water discharges.

- 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 (ACOE).

The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”

State Requirements: Porter-Cologne Water Quality Control Act (California Water Code)

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 otherwise) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state.

The State Water Resources Control Board (SWRCB) and RWQCBs are responsible for establishing the water quality standards (objectives) required by the CWA, and regulating discharges to ensure that the objectives are met. Details regarding water quality standards in a project area are contained in the applicable RWQCB Basin Plan. States designate beneficial uses for all water body segments, and then set criteria necessary to protect these uses. Consequently, the water quality standards developed for particular water segments are based on the identified use and vary depending on such use. In addition, each state identifies waters failing to meet standards for specific pollutants, which are 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 controls, the CWA requires establishing Total Maximum Daily Loads (TMDLs). TMDLs establish allowable pollutant loads from all sources (point, non-point, and natural) for a given watershed.

State Water Resources Control Board and Regional Water Quality Control Boards

The SWRCB administers water rights, water pollution control, and water quality functions throughout the state. RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

- **NPDES Program**

The SWRCB adopted Caltrans Statewide NPDES Permit (Order No. 99-06-DWQ) on July 15, 1999. This permit covers all Department rights-of-way, properties, facilities, and activities in the State. NPDES permits establish a 5-year permitting time frame. NPDES permit requirements remain active until a new permit has been adopted.

In compliance 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 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 2003 SWMP to address storm water runoff or any subsequent SWMP version draft and approved.

- **Municipal Separate Storm Sewer System Program**

The U.S. EPA defines a Municipal Separate Storm Sewer System (MS4) 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 are designed or used for collecting or conveying storm water. As part of the NPDES program, U.S. EPA initiated a program requiring that entities having MS4s apply to their local RWQCBs for storm water discharge permits. The program proceeded through two phases. Under Phase I, the program initiated permit requirements for designated municipalities with populations of 100,000 or greater. Phase II expanded the program to municipalities with populations less than 100,000.

- **Construction Activity Permitting**

Section H.2, Construction Program Management of the Department's NPDES permit states: "The Construction Management Program shall be in compliance with requirement of the NPDES General Permit for Construction Activities (Construction General Permit)". Construction General Permit (Order No. 2009-009-DWQ, adopted on September 2, 2009, will become effective on July 1, 2010. The permit will regulate storm water discharges from construction sites that result in a DSA of 1 acre or greater, and/or are part of a common plan of development. By law, all storm water discharges associated with construction activity where clearing, grading, and excavation results in soil disturbance of at least 1 acre must comply with the provisions of the General Construction Permit.

The newly adopted permit separates projects into Risk Levels 1 – 3. 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. Risk levels are determined during the design phase and are based on potential erosion and transport to receiving waters. Applicants are required to develop and implement an effective Storm Water Pollution Prevention Plan (SWPP).

Caltrans Statewide NPDES Permit requires the Department to submit a Notice of Construction (NOC) to the RWQCB to obtain coverage under the Construction General Permit. Upon project completion, a Notice of Completion of Construction (NOCC) is required to suspend coverage. This process will continue to apply to Department projects until a new Caltrans Statewide NPDES Permit is adopted by the SWRCB. An NOC or equivalent form will be submitted to the RWQCB at least 30 days prior to construction if the associated DSA is 1 acre or more. In accordance with the Department's Standard Specifications, a Water Pollution Control Plan (WPCP) is used for projects with DSA less than 1-acre.

During the construction phase, compliance with the permit and the Department's Standard Special Conditions requires appropriate selection and deployment of both structural and non-structural BMPs. These BMPs must achieve performance standards of Best Available Technology economically achievable/Best Conventional Pollutant Control Technology (BAT/BCT) to reduce or eliminate storm water pollution.

Affected Environment

No wetland delineation has been conducted for the I-405/Arbor Vitae Street New South Half Interchange Project because no wetlands are present within its Project Study Area. The 'No Net Loss Policy' is not relevant to this project. No Section 404 permitting process will be necessary during the project's Plans Specifications and Engineering Phase (PS&E) of the project.

The project area of Build Alternative 2 is located between Century Boulevard and Arbor Vitae Street and includes consisting of Interstate 405 and land west and east of the freeway. No wetlands, as defined by State and Federal definitions, exist within the Project Study Area.

The Least Environmentally Damaging Practicable Alternative has not been determined for the I-405/Arbor Vitae Street New South Half Interchange Project (LEDPA). This is no longer an issue as the No-Build Alternative 1 has been identified as the Preferred Alternative.

The three parameters necessary for an area to be considered a federal jurisdictional wetland are hydric soils, hydrophytic vegetation, and hydrology. All three parameters must be met according to the Army Corps of Engineers Wetland Delineation Manual for the area to be designated a Federal Wetland. Again, as noted on the previous page, no wetlands, as defined by State and Federal definitions, exist within the Project Study Area.

Potential Impacts

No wetland delineation has been conducted for the I-405/Arbor Vitae Street New South Half Interchange Project because no wetlands are present within its Project Study Area.

The environmental setting is urbanized or disturbed with no native biological resources within the project limits or directly adjacent to the project limits. The project's setting consists almost entirely of non-native landscape plants. No natural plant habitat of value or concern exists within the project limits. A variety of mature highway landscape trees and shrubs consisting of the nine species including Eucalyptus and Southern Magnolia exist within the project site.

Army Corps of Engineers regulation 33 CFR 330 requires an Individual Permit for any affected acreage greater than 0.50 acres. However, no amount of acreage will be affected by this project. Therefore, Caltrans does not need to prepare an application and request an Individual Permit during the Section 404 permitting process at the PS&E Phase of this project.

Determination of Least Environmentally Damaging Practicable Alternative (LEDPA). In an analysis of key balancing factors, Caltrans has not identified a "Preferred Alternative" nor the Least Environmentally Damaging Practicable Alternative, or LEDPA. A table will illustrate this analysis and provide a comparison to previously considered build alternatives when the "Preferred Alternative" and LEDPA are identified. This is no longer an issue as the No-Build Alternative 1 has been identified as the Preferred Alternative.

Concurrence with the U.S. Army Corps of Engineers on the LEDPA decision does not need to occur. There will be no Section 404 permitting process during the PS&E phase of this project because no wetlands will be impacted by this project.

There will be no potential for Wetlands and Other Waters Impacts.

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation measures are necessary in regards to wetlands since no wetlands will be impacted by this project.

Wetlands Only Practicable Finding

Executive Order 11990 mandates that an agency such as Caltrans avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands, and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. No wetlands will be affected by Alternative 2, the project's only build alternative. No-Build Alternative 1 will have no impacts on wetlands as it will not involve any construction activity. Therefore, no mitigation is required in regards to Alternative 1. No coordination will be necessary with the US Army Corps of Engineers, California Department of Fish and Game, and Regional Water Quality Control Board during the permitting phase of the project because there will be no net loss of wetlands.

2.3.3 PLANT SPECIES

Regulatory Setting. The U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) share regulatory responsibility for the protection of special-status plant species. “Special-status” species are identified for protection because they are rare and/or subject to population and habitat declines. Special status is a general term for species that are afforded varying levels of regulatory protection. The highest level of protection is given to threatened and endangered species; there are species that are formally listed or proposed for listing as endangered or threatened under the Federal Endangered Species Act (FESA) and/or the California Endangered Species Act (CESA). Also, please refer to the Threatened and Endangered Species section in this document for additional information regarding these species. No threatened or endangered plant species were found within the Project Study Area.

This section of the document discusses all the other special-status plant species, including CDFG fully protected species and species of special concern, USFWS candidate species, and non-listed California Native Plant Society (CNPS) rare and endangered plants.

The regulatory requirements for FESA can be found at United States Code 16 (USC), Section 1531, et. seq. See also 50 CFR Part 402. The regulatory requirements for CESA can be found at California Fish and Game Code, Section 2050, et. seq. Caltrans projects are also subject to the Native Plant Protection Act, found at Fish and Game Code, Section 1900-1913, and the Public Resources Code, Sections 2100-2117.

Federal Endangered Species Act Consultation Summary. Within the Project Study Area, there are no Federal endangered or threatened species; therefore, informal consultation with Fish and Wildlife Service will not be required for this project. Information from the Natural Environmental Survey (NES) by Christopher Stevenson confirms this finding. The project site was evaluated and the only animals and/or evidence of animals noted during field surveys were common to urban development were the Crows and Mourning Dove. There are no regional sensitive species of concern within or directly adjacent to the project limits.

California Endangered Species Act Consultation Summary. Within the Project Study Area, there are no State endangered or threatened species; therefore, informal consultation with the California Department of Fish and Game (CDFG) will not be required for this project. Information from the Natural Environmental Survey (NES) by Christopher Stevenson confirms this finding. The project site was evaluated and the only animals and/or evidence of animals noted during field surveys were common to urban development were the Crows and Mourning Dove. There are no regional sensitive species of concern within or directly adjacent to the project limits.

Affected Environment

Special Status Plant Species. The proposed project is currently not expected to affect, or impact, any special status plant species listed in the California Natural Diversity Database (CNDDDB) or in the USFWS species list as no natural plant habitat of value or concern exists within the project limits.

Potential Impacts

Project Impacts. The proposed project is not expected to affect, or impact, any threatened or endangered plant species. This is because no such plants exist within the project area. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Plant Species Impacts.

Cumulative Effects. Cumulative effects will not result from the proposed project area because no threatened or endangered plant species exist within the project area.

Avoidance, Minimization, and/or Mitigation Measures

Avoidance and Minimization Efforts. Avoidance and minimization efforts are not proposed at this time due to the absence of threatened or endangered species from the project impact area. Future re-evaluation of the project should consider any new occurrence information that may be available for any State or Federal listed threatened or endangered plant species.

Compensatory Mitigation. Compensatory mitigation is not proposed for any threatened or endangered plant species because no threatened or endangered plant species will be affected by the proposed project.

2.3.4 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 (NOAA) Fisheries and the California Department of Fish and Game (CDFG) are responsible for implementing these laws. This section discusses potential impacts and permit requirements associated with wildlife not listed or proposed for listing under the State or Federal Endangered Species Act (ESA). Species listed or proposed for listing as threatened or endangered are discussed later in this chapter. All other special-status animal species are discussed here, including CDFG fully protected species and species of special concern, and USFWS or NOAA Fisheries candidate species.

Federal laws and regulations pertaining to wildlife include the following:

- National Environmental Policy Act
- Migratory Bird Treaty Act
- Fish and Wildlife Coordination Act

State laws and regulations pertaining to wildlife include the following:

- California Quality Act
- Sections 1600-1603 of the Fish and Game Code
- Sections 4150 and 4152 of the Fish and Game Code

Federal Endangered Species Act Consultation Summary. Within the Project Study Area, there are no Federal endangered or threatened species; therefore, informal consultation with Fish and Wildlife Service will not be required for this project. Information from the Natural Environmental Survey (NES) by Christopher Stevenson confirms this finding. The project site was evaluated and the only animals and/or evidence of animals noted during field surveys were common to urban development were the Crows and Mourning Dove. There are no regional sensitive species of concern within or directly adjacent to the project limits.

California Endangered Species Act Consultation Summary. Within the Project Study Area, there are no State endangered or threatened species; therefore, informal consultation with the California Department of Fish and Game (CDFG) will not be required for this project. Information from the Natural Environmental Survey (NES) by Christopher Stevenson confirms this finding. The project site was evaluated and the only animals and/or evidence of animals noted during field surveys were common to urban development were the Crows and Mourning Dove. There are no regional sensitive species of concern within or directly adjacent to the project limits.

Affected Environment

The project site was evaluated for value as wildlife habitat. The environmental setting is urbanized or disturbed, with no native biological resources within the project limits or directly adjacent to the project limits. The only animals and/or evidence of animals noted during field

surveys were species common to urban development. Crows and Mourning Dove were observed within the Project Study Area. The project site provides extremely poor habitat to most wildlife species because it is void of native vegetation, and is highly disturbed from human activity and is adjacent to heavy urban development. Homeless encampments are also present on the project site.

Potential Impacts

Although there may be temporary disruptions or impacts during the construction phase of the project, no permanent direct or indirect impacts are anticipated to occur to either the Crows or Mourning Dove as a result of this project. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Animal Species Impacts.

Avoidance, Minimization, and/or Mitigation Measures

Standard avoidance and minimization practices will be followed as outlined in the Migratory Bird Treaty Act.

2.3.5 THREATENED AND ENDANGERED SPECIES

Regulatory Setting. The primary federal law protecting threatened and endangered species is the Federal Endangered Species Act (FESA): 16 United States Code (USC), Section 1531, et seq. See also 50 CFR Part 402. This act and subsequent amendments provide for the conservation of endangered and threatened species and the ecosystems upon which they depend. Under Section 7 of this act, federal agencies, such as the Federal Highway Administration, are required to consult with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NOAA Fisheries) to ensure that they are not undertaking, funding, permitting or authorizing actions likely to jeopardize the continued existence of listed species or destroy or adversely modify designated critical habitat. Critical habitat is defined as geographic locations critical to the existence of a threatened or endangered species. The outcome of consultation under Section 7 is a Biological Opinion or an incidental take permit. Section 3 of FESA defines take as “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect or any attempt at such conduct.”

California has enacted a similar law at the state level, the California Endangered Species Act (CESA), California Fish and Game Code, Section 2050, et seq. CESA emphasizes early consultation to avoid potential impacts to rare, endangered and threatened species and to develop appropriate planning to offset project caused losses of listed species populations and their essential habitats. The California Department of Fish and Game (CDFG) is the agency responsible for implementing CESA. Section 2081 of the Fish and Game Code prohibits “take” of any species determined to be an endangered species or a threatened species. Take is defined in Section 86 of the Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” CESA allows for take incidental to otherwise lawful development projects; for these actions an incidental take permit is issued by CDFG. For projects requiring a Biological Opinion under Section 7 of the FESA, CDFG may also authorize impacts to CESA species by issuing a Consistency Determination under Section 2080.1 of the Fish and Game Code.

Regional Federal and State Listed Species. The proposed project is currently not expected to affect, or impact, any regional sensitive animal species listed in the California Natural Diversity Database (CNDDDB) or the U.S. Fish and Wildlife Service species list. The only animals and/or evidence of animals noted during field surveys were species common to urban development. Crows and Mourning Dove were observed within the Project Study Area.

Regional Federal and State Listed Species with Highest Probability of Occurrence

No regional sensitive animal species listed in the California Natural Diversity Database (CNDDB) or the U.S. Fish and Wildlife Service species list exist within the Project Study Area. Therefore, the proposed project is not expected to affect any regional special status animal species.

Potential Impacts

Project Impacts. The project site was evaluated for value as wildlife habitat for animal species, including threatened and endangered species. Due to the lack of suitable habitat found within the project site as well as directly adjacent to the project area, it is not likely that the project's build alternative would have a direct or an indirect impact on a threatened or endangered species. As No-Build Alternative 1 has been identified as the Preferred Alternative, there will be no potential for Threatened and Endangered Species Impacts.

Cumulative Effects. Cumulative effects will not result from the proposed project area because no threatened or endangered animal species exist within the project area.

Avoidance, Minimization, and/or Mitigation Measures

Avoidance and Minimization Efforts. Standard avoidance and minimization practices will be followed as outlined in the Migratory Bird Treaty Act.

Compensatory Mitigation. Compensatory mitigation is not proposed for any threatened or endangered animal species because no threatened or endangered animal species will be affected by the proposed project.

2.3.6 INVASIVE SPECIES

Regulatory Setting. On February 3, 1999, President Clinton signed Executive Order 13112 requiring federal agencies to combat the introduction or spread of invasive species in the United States. The order defines invasive species as "any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health." Federal Highway Administration guidance issued August 10, 1999 directs the use of the state's noxious weed list to define the invasive plants that must be considered as part of the NEPA analysis for a proposed project.

Avoidance, Minimization, and/or Mitigation Measures. In compliance with the Executive Order on Invasive Species, E.O. 13112, and subsequent guidance from the Federal Highway Administration, the landscaping and erosion control included in the project will not use species listed as noxious weeds. In areas of particular sensitivity, extra precautions will be taken if invasive species are found in or adjacent to the construction areas. These include the inspection and cleaning of construction equipment and eradication strategies to be implemented should an invasion occur.

2.3.7 BIOACOUSTICS AND HIGHWAY NOISE IMPACTS TO THE BIOLOGICAL ENVIRONMENT

Noise. In July 2008, a noise study was conducted to determine the traffic noise impacts that the proposed Interstate 405/Arbor Vitae Street New South Half Interchange may have upon the entire area within the project limits, including any wildlife inhabitants. This study addresses increases in traffic noise resulting from the project as well as noise during construction that may cause an adverse impact on the wildlife in the area.

The Federal Highway Administration (FHWA) and Caltrans policies do not address noise impacts on wildlife species. However, the United States Endangered Species Act prohibits activities that would adversely affect habitats and the survival of endangered species. The Natural

Environmental Study was done to specifically address impacts to such species that may occur from this project. No endangered or threatened species have been found within the Project Study Area.

All relevant studies were done to determine existing and future noise and sound levels before, during and after construction of the project's build alternative. A field noise investigation was conducted to determine existing noise levels and gather information to develop and calibrate the noise model that was used for predicting future traffic and construction noise levels. Existing noise levels were recorded at 10 locations within and adjacent to the Project Study Area. The analysis locations are acoustically representative of the areas of concern. The existing ambient noise levels recorded ranged from 61 to 76 decibels (dBA). Additionally, sound level readings, pertinent field data, and construction equipment noise emission characteristics were used to develop the noise model for the area. The noise model was then used to predict expected traffic noise levels as well as equipment noise during construction activities.

The traffic and construction noise analysis indicated that construction activities, particularly the use of impact pile drivers, would substantially increase noise levels in and adjacent to the Project Study Area. These increases, from 10 to 25 dBA, would be intermittent and temporary. Construction and noise abatement measures can effectively reduce the noise impact during construction activities, and can consist of noise-suppressing sound blankets, use of alternative equipment, and ensuring that all of the equipment is in good working order.

Based on the Traffic Noise Study Report, it has been determined that the ambient noise levels in the Project Study Area will be 0 to 1 dBA due to traffic noise from the new freeway connector and on/off ramps and may experience temporary but substantial noise increase during the construction phase of the project. The levels of construction noise will depend on the type of equipment being used and can reach very high levels when equipment with high noise signatures are used. Construction noise abatement measures will be necessary if such equipment is used in order to reduce expected construction noise levels in the area. The final decision to implement construction noise abatement will be made upon completion of the project design and requirements based on Caltrans standard specifications, Section 7-1.011, Sound Control Requirements. These requirements state that noise levels generated during construction shall comply with applicable local, state, and federal regulation.

Bioacoustics Report. No bioacoustics report was composed for this project because no threatened or endangered bird species have been found within the Project Study Area. No laboratory data was collected to make interim guidelines for determining effects.

Avoidance, Minimization, and/or Mitigation Measures. The traffic and construction noise analysis indicated that construction activities, particularly the use of pile drivers, could significantly increase noise levels in the area. Construction noise abatement measures can effectively reduce the noise impact during construction. The abatement measures will consist of noise-suppressing sound blankets, use of alternative equipment, and ensuring that all of the equipment is in good working order.

2.4 CONSTRUCTION IMPACTS

Traffic Impacts Related to Construction Activities. It is expected that detailed construction staging plans will be completed for this project, and that a detailed analysis of how traffic will be impacted during the construction phase of the Preferred Alternative will be provided once these plans are available. Meanwhile, a Traffic Management Plan (TMP) will be prepared based on the preliminary stage construction concept that has been developed for the I-405/Arbor Vitae Street New South Half Interchange Project. The purpose of this section is to provide an overview or discussion of the expected traffic impacts related to construction activities. Similar projects have been constructed along Interstate 405 and other freeways within the Los Angeles metropolitan area in the recent past, and it is believed the project will have similar impacts.

The proposed project will not require lengthy closures of freeway facilities in the project area. With a few exceptions, the construction of the new ramps for the proposed new south half interchange will take place adjacent to mainline traffic and can generally be constructed while maintaining traffic on the existing roadway. Therefore, existing mainline, collector road, and ramp will utilize existing lanes with minor restriping work as needed. It is anticipated that detoured traffic on local streets will be minimal. Two sound walls will be constructed, when feasible, during Stage 2 of construction. During State 3 of construction, roadway work may require some intermittent closures of short duration for various freeway facilities in the project area. Table 23 below details preliminary lane closure plans for Build Alternative 2.

Table 23. Preliminary Lane Closure Plans During Construction

Overall Project	Duration	Segment	Lane Number	Work Description
Stage 1	3 years	Century Collector Overcrossing	1	Retaining walls will be constructed and a temporary roadway for a northbound collector onramp going over the northbound collector road off-ramp for detour. A temporary bridge will be constructed to accommodate the detour
Stage 2	3 years	Century Collector Overcrossing	1	A portion of the new Century Collector Overcrossing will be completely constructed. Northbound Collector on-ramp traffic will be back to its original alignment and the temporary bridge is removed
Stage 3	14 days	Southbound Arbor Vitae On-ramp Br.	2	The southbound I-405 on-ramp from Olive Street will be closed for the needed realignment work.

Source: LA405/Arbor Vitae New South Half Interchange Traffic Management Plan (TMP)

Water Quality Impacts Related to Construction Activities. Pursuant to the Clean Water Act (Section 402), Caltrans has obtained from the State Water Regional Control Board (SWRCB) a National Pollutant Discharge Elimination System (NPDES) permit that regulates storm water discharges from Caltrans facilities. The permit requires Caltrans to maintain and implement an effective Storm Water Management Plan (SWMP) that identifies and describes the BMPs used to reduce or eliminate the storm water runoff discharge of pollutants to waters of drainage conveyances and water bodies. The SWMP is the framework for developing and implementing guidance to meet permit requirements for Caltrans’ storm water discharges.

With respect to storm water quality, avoidance and minimization are accomplished by implementation of approved BMPs, which are generally broken down into four categories: Design Pollution Prevention, Treatment, Construction, and Maintenance BMPs. Certain projects may require installation and maintenance of permanent controls to treat storm water. Selection and design of permanent project BMPs is primarily refined in the next phase of the project: the Plans Specifications and Estimates phase.

During construction activities, Caltrans has a comprehensive program for preventing water pollution via the preparation and implementation of the aforementioned SWPPP and Water Pollution Control Program (WPCP). Caltrans has also developed and obtained the SWRCB approval of numerous BMPs for preventing water pollution during construction. Caltrans construction BMPs, SWPPP, and WPCP also incorporate the requirements of the SWRCB NPDES permit. These actions are implemented jointly by Caltrans and the contractor hired to construct the project, prior to construction.

Potential for Exposure of Workers to Geologic/Soils Hazards During Construction. Currently, there are currently no special considerations of provisions recommended as a result of this project and the geologic conditions in the area, although, workers are subject to implementation and practice of general safety practices within construction zones.

Potential for Detrimental Hazardous Waste Impacts During Construction Activities. The purpose of the Initial Site Assessment (ISA) is to identify, to the extent feasible, hazardous and

potential waste problems within and next to the right-of-way and proposed Project Study Area. Based on the results of historical research, review of environmental databases, regulatory agency inquiries, and site reconnaissance, properties were evaluated and classified as High, Moderate, or Low with regard to the potential for detrimental impacts during construction activities for this project.

Table 24. Designated Properties of Concern

Site	Address	Distance from Project Study Area	Description	List(s) that Site Appears on
Bon-Air Freight Company	901 West Arbor Vitae Street Inglewood, CA 90301	1/8 mile to the west	A truck storage/cargo facility with one gasoline underground storage tank	Underground Storage List (UST)
Hindry Press Inc.	327 South Glasgow Avenue Inglewood, CA 90301	1/8 mile to the west	Warehouse and printing press facility that could generate hazardous waste	Environmental Protection Agency Resource Conservation and Recovery Act (RCRA) List
Marlee Electronics Corporation	900 West Olive Avenue Inglewood, CA 90301	1/8 mile to the west	Electronics manufacturing, repair, and distribution facility that could generate hazardous	Environmental Protection Agency Resource Conservation and Recovery Act (RCRA) List
MS Body and Paint	319 South Glasgow Avenue Inglewood, CA 90301	1/8 mile to the west	Auto body and paint facility that could generate hazardous waste	Environmental Protection Agency Resource Conservation and Recovery Act (RCRA) List
D&K Drive In (Pullman Properties)	937 West Arbor Vitae Street Inglewood, CA 90301	1/8 mile to the west	Restaurant that could generate hazardous waste	Hazardous Waste and Substance Site List/Cortese List
Southern California Edison	8611 South La Cienega Boulevard Inglewood, CA 90301	1/12 mile to the west	Office/industrial facility that has a 5,000 gallon diesel underground storage tank that has leaked fuel.	Underground Storage List (UST), Leaking Underground Storage (LUST) List

Air Quality and Construction-Related Emissions. Construction activities associated with the proposed project would be temporary and would last the duration of project construction. The discussion below has concluded that project construction would not create adverse pollutant emissions for the build alternative under consideration. Short-term impacts to air quality would occur during minor grading/trenching, new pavement construction and the re-stripping phase. Additional sources of construction related emissions include:

- Exhaust emissions and potential odors from construction equipment used on the construction site as well as the vehicles used to transport materials to and from the site; and
- Exhaust emissions from the motor vehicles of the construction crew.

Project construction would result in temporary emissions of Carbon Monoxide (CO), Nitrous Oxide (NO_x), Volatile Organic Compounds (VOC), and Particulate Matter 10 parts per million (PM₁₀). Stationary or mobile-powered On-site construction equipment includes trucks tractors, signal boards, excavators, backhoes, concrete saws, crushing, and/or processing equipment, graders, trenchers, pavers and other paving equipment. The amount of worker trips to the site is unknown at this time. However, given the high volume of traffic in this area, the addition of worker trips will be inconsequential. Based on the insignificant relative amount of daily work trips required for project construction, construction worker trips are not considered to significantly contribute to or affect traffic flow on local roadways and are therefore considered significant. During the demolition phase some asphalt concrete (AC) pavement and curbs and gutters would have to be removed.

In order to further minimize construction-related emissions, all construction vehicles and construction equipment would be required to be equipped with the state-mandated emission control devices pursuant to state emission regulations and standard construction practices. After construction of the project is complete, all construction-related impacts would cease, thus resulting in a less than significant impact. Short-term construction PM₁₀ emissions would be

further reduced with the implementation of required dust suppression measures outlined within SCAQMD Rule 403 presented in Section 5.5. Note that Caltrans Standard Specifications for construction (Section 10 and 18 [Dust Control] and Section 39-3.06 [Asphalt Concrete Plants]) must also be adhered to. Therefore, project construction is not anticipated to violate State or Federal air quality standards or contribute to the existing air quality violation in the air basin.

Section 93.122(d)(2) of the EPA Transportation Conformity Rule requires that in PM₁₀ non-attainment and maintenance areas (for which the SIPs identify construction-related fugitive dust as a contributor to the area problem), the RTIP should conduct the construction-related fugitive PM₁₀ emissions analysis. The 2003 PM₁₀ SIP/AQMP emissions budgets for SCAB include the construction and unpaved-road emissions. The 2008 RTIP PM₁₀ regional emissions analysis includes the construction and unpaved road emissions for conformity finding.

Mitigation of PM₁₀ During Construction. The approved 2003 Particulate Matter SIP contains provisions calling for mitigation of PM₁₀ emissions during construction. Pursuant §93.117, Caltrans, the project sponsor, is required to stipulate to include, in its final plans, specification, and estimates, control measures that will limit the emission of PM₁₀ during construction. Such control plans must be contained in an applicable SIP.

The PM₁₀ emissions is a composite of geologic and aerosol variety. The prime concern during construction is to mitigate geologic PM₁₀ that occurs from earth movement such as grading. South Coast Air Quality Management District (SCAQMD) sponsored the PM₁₀ SIP with concurrence from the California Air Resource Board. SCAQMD has established Rule 403 that addresses the mitigation PM₁₀ by reducing the ambient entertainment of fugitive dust and Rule 402 which requires that air pollutant emissions not be a nuisance off-site. Fugitive dust consists of solid particulate matters that becomes airborne due to human activity (i.e. construction) and is a subset of total suspended particulates. Likewise, PM₁₀ is a subset of total suspended particulates. The Handbook states that 50% of total particulate matter suspended comprise of PM₁₀. Hence, in mitigating for fugitive dust, emissions of geologic PM₁₀ are reduced.

During construction of the project, the property owner/development and its contractors shall be required to comply with regional rules, which shall assist in reducing short-term air pollutant emissions. SCAQMD Rule 402 requires that air pollutant emissions not be a nuisance off-site. SCAQMD Rule 403 requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Two options are presented in Rule 403: Monitoring of particulate concentrations or active control. Monitoring involves a sampling network around the project with no additional control measures unless specified concentrations are exceeded. The active control option does not require any monitoring, but requires that a list of measures be implemented starting with the first day of construction.

Rule 403 requires that “No person conducting active operations without utilizing the applicable best available control measures included in Table 1 of this Rule to minimize fugitive dust emissions from each fugitive dust source type within the active operation.”

Rule 403 requires that “Large Projects” implement additional measures. A Large Project is defined as “any active operations on property which contains 50 or more acres of disturbed surface area; or any earth-moving operation with a daily earth-moving or throughput volume of 5,000 cubic yards or more three times during the most recent 365 day period. Depending on the scheduling of grading of the project may be considered a Large Project under Rule 403. Therefore, the project will be required to implement the applicable actions specified in Table 2 of the Rule. As a Large Operation, the project would also be required to:

- Submit a fully executed Large Operation Notification (SCAQMD Form 403N) to the SCAQMD Executive Officer within 7 days of qualifying as a large operation;

- Include, as part of the notification, the name(s), address(es), and phone number(s) of the person(s) responsible for the submittal, and a description of the operation(s), including a map depicting the location of the site;
- Maintain daily records to document the specific dust control actions taken, maintain such records for a period of not less than three years; and make such records available to the Executive Officer upon request.
- Install and maintain project signage with project contract signage that meets the minimum standards of the Rule 403 Implementation Handbook, prior to initiating any earthmoving activities.
- Identify a dust control supervisor that is employed by or contracted with the property owner/developer, is on the site or available On-site within 30 minutes during working hours, has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule requirements, and has completed the AQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class.
- Notify the SCAQMD Executive Officer in writing within 30 days after the site no longer qualifies as a large operation.

Rule 403 also requires that the construction activities "shall not cause or allow PM₁₀ levels exceed 5.7 ounces per cubic feet when determined by simultaneous sampling, as the difference between upward and down wind sample." Large Projects that can not meet this performance standard are required to implement the applicable actions specified in Table 3 of Rule 403. Rather than perform monitoring to determine conformance with the performance standard, which will not reduce PM₁₀ emissions, the project shall implement all applicable measures presented in Rule 403 Table 3 regardless of conformance with the Rule 403 performance standard. This potentially results in a greater reduction of particulate emissions than if these measures were implemented only after being determined to be required by monitoring.

Further, Rule 403 requires that the project shall not allow "track-out to extend 25 feet or more in cumulative length from the point of origin from an active operation." All track-out from an active operation is required to be removed at the conclusion of each workday or evening shift. Any active operation with a disturbed surface area of five or more acres or with a daily import or export of 100 cubic yards or more of bulk materials must utilize at least one of the measures listed at each vehicle egress from the site to a paved public road. All measures applicable to the construction activities associated with the project should be implemented to the greatest extent possible.

Noise Impacts Related to Construction. 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 7-1-011, Sound Control Requirements (7). These requirements state that noise levels generated during construction shall comply with applicable local, state, and federal regulations and that all equipment shall be fitted with adequate mufflers according to the manufacturers' specifications.

Figure 2-21 on the next page 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. No adverse noise impacts from construction are anticipated because construction would be conducted in accordance with Caltrans standard specifications and would be short-term, intermittent, and dominated by local traffic noise. Implementing the following measures would minimize temporary construction noise impacts:

- All equipment shall have sound-control devices no less effective than those provided on the original equipment. No equipment shall have an unmuffled exhaust.
- No pile driving, jackhammer and drill or trucks using backup beepers shall be permitted during nighttime hours (9pm to 7am) to minimize disturbance for neighboring residents. As an alternative to pile driving, please use cast and drill hole method during nighttime hours.
- The “backing-up beeping alarm” of trucks be minimized to the maximum extent or eliminated altogether during nighttime hours (9pm to 7am).
- Simultaneous equipment idling noise needs to be minimized to reduce the cumulative construction noise.
- The two proposed sound walls needs to be constructed before all other construction activities begin.
- Caltrans will make it clear to the public during construction that if they feel that the noise levels are excessive, the agency will take noise readings during construction to ensure that noise levels do not exceed 86 dBA at homes located 50 or more feet from the construction zone.
- Caltrans will take action to ensure that noise levels just below 86 dBA will not remain constant.
- As directed by the Engineer, the contractor shall implement appropriate additional noise mitigation measures including, but not limited to, changing the location of stationary construction equipment, turning off idling equipment, rescheduling construction activity, notifying adjacent residents in advance of construction work, or installing acoustic barriers around stationary construction noise sources.

Figure 2-21. Construction Equipment Noise Levels

Equipment	Mazimum Noise Level 15m (50 ft) distance
Scrapers	89 dBA
Bulldozers	85 dBA
Heavy trucks	88 dBA
Backhoes	80 dBA
Pneumatic Tools	85 dBA
Concrete Pump	82 dBA

Source: Federal Transit Administration, 1995

Maintenance of Access During Construction. There will be short-term (temporary) access problems (pedestrian and vehicular) which will result from construction of the proposed project. Thus, these construction impacts are not considered permanent. Funds have been allocated to provide a Traffic Management Plan (TMP), which will be developed and incorporated as part of the project design and prior to the onset of construction to minimize disruption to the existing traffic flow conditions.

A TMP typically serves to notify the motoring public and affected parties of construction dates, activities, and alternate routes (if proposed as part of a project), in an effort to reduce the volume of traffic through the area. The TMP may also provide motorists with alternate routes around any congestion-related delays. The TMP will consist of the following elements to minimize construction related traffic and access disruption:

- 1) Temporary traffic controls and signing shall be utilized
- 2) The implementation of traffic control procedures will be in conformance with the Caltrans Traffic Manual

- 3) A minimum of two through travel lanes in each direction will be provided
- 4) Public Information center
- 5) Additional project signing
- 6) Advertising in local and regional newspapers
- 7) Staff attendance at local neighborhood and business association meetings to inform residents and merchants/landowners of project progress

Any bus stops located in the vicinity of the interchange will have to be relocated temporarily during construction since pedestrians will not be allowed in construction areas. The Caltrans will order the resident construction engineer to post notifications prior to each bus stop's relocation. In addition, Caltrans will coordinate efforts with the Metropolitan Transit Authority (MTA), Los Angeles Department of Transportation (LADOT), and all other appropriate transit agencies with operations in the area. A pedestrian traffic detouring plan shall be developed and implemented in order to ensure the safety of pedestrians, as well as to minimize pedestrian traffic disruption.

Additional Public Safety Measures During Construction. Whenever the project contractor's operations create a condition hazardous to the public or traffic, the contract will furnish, erect, and maintain protective fences, temporary railing, barricades, lights, signs, and other devices, and take such other protective measures that are necessary to prevent accidents or damage or injury to the public.

- The contractor shall also furnish flaggers as are necessary to give adequate warning to traffic or to the public of any dangerous conditions to be encountered.
- Construction equipment shall enter and leave the highway via existing ramps and crossovers and shall move in the direction of public traffic. All movement of workmen and construction equipment on or across lanes open to public traffic shall be performed in a manner that will not endanger public traffic.
- Pedestrian openings through falsework shall be paved or provided with full-width continuous wood-walks and shall be kept clear. Pedestrians shall be protected from falling objects and curing water for concrete. All pedestrian openings through falsework shall be illuminated.
- No material or equipment shall be stored where it will interfere with the free and safe passage of public traffic, and at the end of each day's work and at other times when construction operations are suspended for any reason, the contractor shall remove all equipment and other obstructions from that portion of the roadway open for use by public traffic.
- The Build Alternative would take approximately 2 years to construct. Caltrans would stage the work in order to minimize the impact to the traveling motorists as well as the non-motorists. Alternative 2 would have impacted seven properties, one of which is an unoccupied multi-family residential dwelling.
- Construction work on local streets would require taking (reducing) lanes during the day although access in each direction would still be maintained. At this time, it is not possible to gage how long this would remain. **Caltrans does not permit detour traffic into residential neighborhoods.**
- Construction often requires night work. CALTRANS and the project contractors will conform to all City of Inglewood noise ordinances. At this time, it is not possible to gage how long night work would be required.
- Construction work would be done in stages (in pieces rather than all at once) to allow non-motorists access through the project site during construction. Pedestrian crossings would be maintained through the construction zone.

Caltrans Public Awareness Campaign During Construction of the Preferred Alternative. Prior to the start of construction of Build Alternative 2, Caltrans and/or a Caltrans public relations consultant shall oversee and be responsible for implementation of the following elements of the project's Public Awareness Campaign:

- Coordinate and implement a pre-construction community meeting as well as other construction information meetings as necessary
- Create, operate, and maintain a 1-800 number hotline in which interested individuals would call to find out the latest construction information, as well as, to ask questions and make complaints
- Create and circulate newspaper ads, radio ads, and press releases to announce new detours, road closures, work schedules, staging, and other pertinent construction information.
- Mail construction notice flyers to all residences within a 1 to 2 mile radius of construction zones
- Caltrans will assign a resident engineer to oversee the construction of the project whose phone number will be made available to handle any questions or complaints from the public
- Work in a coordination and advisory role with the construction resident engineer and inspector to ensure that the contractor is implementing correct, accurate, clear, intuitive, and conscientious construction signage throughout the entire project area to ensure motorist and pedestrian safety and convenience
- Work in a coordination and advisory role with the construction resident engineer and inspector to ensure that the contractor immediately eradicates the following within the construction zones: i) homeless persons encampments ii) illegal dumping iii) graffiti iv) and other adverse quality of life issues that could negatively affect the community
- Work in a coordination and advisory role with the construction resident engineer and inspector to ensure that complaints are immediately addressed and the reported problems are immediately eradicated

2.5 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 project. A cumulative effect assessment looks at the collective impacts poised 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 types of agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitat and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and introduction or promotions 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.

A definition of cumulative impacts, under NEPA, can be found in 40 CFR, Section 1508.7 of the CEQ Regulations.

Cumulative Impacts Related to Construction

Cumulative impacts have been identified that are related to TEMPORARY construction-related activities, and in regard to noise, dust, and access, amongst other activities. Caltrans has established minimization measures and Best Management Practices (BMPs) to ensure compliance with all established standards in the interests of maintaining a healthy environment in the surrounding project area. Caltrans also ensures that this project will not be constructed simultaneously with any other Caltrans project on the I-405 freeway, or simultaneously with any

other City of Los Angeles or County of Los Angeles roadway improvement projects in the vicinity of the project area. Other Caltrans improvement projects on Interstate 405 are listed on the following page, complete with construction dates, which may be preliminary, and subject to change at any time.

Other Caltrans Improvement Projects on Interstate 405

EA 1178U1 | Southbound & Northbound Interstate 405 Carpool Lane

Mile Marker: 25.9/29.5
Construct carpool lane from Route 90 to Interstate 10
Construction completed

EA 120300 | Northbound Interstate 405 Carpool Lane

Mile Marker: 28.8/39.0
Construct carpool lane from National Boulevard to Greenleaf Street
Construction: 4/2009-4/2013

EA 1667U4 | Southbound Interstate 405 Carpool Lane

Mile Marker: 31.9/39.7
Construct southbound carpool lane
Construction completed

EA 191004 | Northbound Interstate 405 Auxiliary Lane

Mile Marker: 37.0/39.0
Add auxiliary lane from Mulholland Drive
Construction completed

EA 191304 | Northbound Interstate 405 to Southbound US Route 101 Widening

Mile Marker: 39.0/39.4
Widen northbound I-405 to southbound US-101 connector
Construction completed

EA 195903 | Southbound Interstate 405 Carpool Lane

Mile Marker: 29.8/32.1
From I-10/I-405 Interchange to Waterford Street
Add auxiliary lane, add carpool lane
Construction completed

EA 199611 | Southbound Interstate 405 to US-101 Connector Improvement Project

Mile Marker: I-405: 39.4/40.5, US-101: 17.0/19.4
From southbound I-405 to North and southbound US-101 Freeway
New two-lane 50 miles per hour connector and bridge structure over Sepulveda Dam
Construction: 12/2013-1/2017

EA 199624 | Northbound Interstate 405 Carpool Lane

Mile Marker: 38.8/40.1
Construct carpool lane from Greenleaf to Burbank Boulevard
Construction completed

EA 201203 | Northbound Interstate 405 Gap Closure

Mile Marker: 38.7/39.4
Carpool gap closure with structure
Construction completed

To further avoid significant and cumulative construction-related impacts. Caltrans shall:

- Implement a Public Awareness Campaign for the I-405 at Arbor Vitae Street New South Half Interchange Project as previously mentioned in the construction impacts section. Caltrans and/or a Caltrans public relations consultant shall actively oversee and be responsible for implementation of this campaign.
- All city street improvements/mitigation as discussed in Section 2.1.6 (Traffic and Transportation/Pedestrian and Bicycle Facilities) is expected to be completely within Caltrans and City of Los Angeles right-of-way, and therefore, right-of-way impacts to adjacent residential and business properties is not required, nor expected.
- All city street improvements/mitigation as discussed in Section 2.1.6 (Traffic and Transportation/Pedestrian and Bicycle Facilities) would be properly phased and staged during implementation to ensure that the area does not experience significant, simultaneous, or cumulative construction-related impacts.

Caltrans and the Los Angeles Department of Transportation (LADOT) shall continue to refine the city street improvements/mitigation as discussed in Section 2.1.6 (Traffic and Transportation/Pedestrian and Bicycle Facilities), and shall jointly ensure that all associated impacts are avoided, minimized, and mitigated to the maximum practicable extent in any necessary environmental reevaluation/addendum, to avoid any significant cumulative and construction-related impacts.

2.6 CLIMATE CHANGE

Regulatory Setting. While climate change has been a concern since at least 1988, as evidenced by the establishment of the United Nations and World Meteorological Organization's Intergovernmental Panel on Climate Change (IPCC), the efforts devoted to greenhouse gas (GHG) emissions reduction and climate change research and policy have increased dramatically in recent years. These efforts are primarily concerned with the emissions of GHG related to human activity that include carbon dioxide (CO₂), methane, nitrous oxide, tetrafluoromethane, hexafluoroethane, sulfur hexafluoride, HFC-23 (fluoroform), HFC-134a (s, s, s, 2 – tetrafluoroethane), and HFC-152a (difluoroethane).

With the passage of several pieces of legislation including State Senate and Assembly Bills as well as Executive Orders from the Governor, California launched an innovative and pro-active approach to dealing with greenhouse gas emissions and climate change at the state level. This legislation was discussed in further detail in the Draft EA/IS Circulated in December 2009 for this project.

Climate change and GHG reduction is also a concern at the federal level; however, at this time, no legislation or regulations have been enacted specifically addressing GHG emissions reductions and climate change. California, in conjunction with several environmental organizations and several other states, sued to force the U.S. Environmental Protection Agency (EPA) to regulate GHG as a pollutant under the Clean Air Act (Massachusetts vs. Environmental Protection Agency et al., 549 U.S. 497 (2007)). The court ruled that GHG does fit within the Clean Air Act's definition of a pollutant, and that the EPA does have the authority to regulate GHG. Despite the Supreme Court ruling, there are no promulgated federal regulations to date limiting GHG emissions.

On December 7, 2009, the EPA Administrator signed two distinct findings regarding greenhouse gases under section 202(a) of the Clean Air Act:

Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed greenhouse gases--carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons

(PFCs), and sulfur hexafluoride (SF₆)--in the atmosphere threaten the public health and welfare of current and future generations.

Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action is a prerequisite to finalizing the EPA's proposed greenhouse gas emission standards for light-duty vehicles, which were jointly proposed by EPA and the Department of Transportation's National Highway Safety Administration on September 15, 2009. ¹ On May 7, 2010 the final Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards was published in the Federal Register. The final combined USEPA and National Highway Traffic Safety Administration that make 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. They require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon (MPG) if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards will cut greenhouse gas 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).

Neither EPA nor FHWA has promulgated explicit guidance or methodology 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 facilitate 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 regarding climate change, the issue was addressed in the CEQA chapter of the draft Initial Study/Environmental Assessment for this project and may be used to inform the 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.

Caltrans and its parent agency, the Business, Transportation, and Housing 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 (see Climate Action Program at Caltrans (December 2006), Caltrans has created and is implementing the Climate Action Program at Caltrans that was published in December 2006. This document can be found at: <http://www.dot.ca.gov/docs/ClimateReport.pdf>

¹ <http://www.epa.gov/climatechange/endangerment.html>

Project Analysis

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 from mobile sources, such as automobiles, occur at stop-and-go speeds (0-25 miles per hour) and speeds over 55 mph; the most severe emissions occur from 0-25 miles per hour (see Figure below). 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.

The purpose of the proposed project was to relieve congestion and improve operations for I-405, however an updated traffic study (April 6, 2010) indicates that for the build alternative (as shown on table 13 in chapter 2) the LOS will improve from F to E for the intersection of Manchester Avenue and Sepulveda Boulevard and Manchester Avenue and Airport Boulevard and improve from C to B for the intersection of Manchester Avenue and Hindry Avenue. However, the LOS for the intersection of Arbor Vitae Street and Sepulveda Boulevard is predicted to worsen from C to F and from B to F at the intersection of Arbor Vitae Street and Inglewood Avenue as a result of this proposed alternative. For the No Build alternative (as shown on table 13 in Chapter 2) LOS is predicted to deteriorate from E to F for the intersection of La Tijera Boulevard and Sepulveda Boulevard and from C to D for the intersection of Arbor Vitae Street and Aviation Boulevard. However, the LOS on is predicted to improve from E to D at the intersection of Manchester Avenue and Airport Boulevard and D to B at the intersection of Manchester Avenue and Inglewood Avenue as a result of the proposed no-build alternative. LOS will deteriorate with the No-Build Alternative from E to F at the intersection of Manchester Avenue and Prairie Avenue and from B to D at the intersection of Century Boulevard and Felton Avenue. Although traffic studies for both alternatives indicate increased congestion at surrounding intersections for proposed build alternative with some minor improvement at surrounding intersections for the proposed no-build alternative, there would be no overall increase or reduction in greenhouse gas emissions from either the proposed build or no-build alternative.

Although a detailed project-level GHG analysis is not included in this document, the Department continues to be actively involved on the Governor's Climate Action Team as ARB works to implement AB 1493 and AB 32. As part of the Climate Action Program at Caltrans (December 2006), 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 is working closely with local jurisdictions on planning activities; however, the Department does not have local land use planning authority. The Department is also supporting efforts to improve the energy efficiency of the transportation sector by increasing vehicle fuel economy in new cars, light and heavy-duty trucks. However it is important to note that the control of the fuel economy standards is held by the United States Environmental Protection Agency and ARB. Lastly, the use of alternative fuels is also being considered; the Department is participating in funding for alternative fuel research at the University of California Davis. For more detailed information about each strategy, please see Climate Action Program at Caltrans (December 2006); it is available at <http://www.dot.ca.gov/docs/ClimateReport.pdf>.

CHAPTER 3 | COMMENTS AND COORDINATION

Early and continuing coordination with the general public and appropriate public agencies is an essential part of the environmental process to determine the scope of environmental documentation, the level of analysis, potential impacts and 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 meetings, interagency coordination meetings, scoping meeting, etc. This chapter summarizes the results of Caltrans' efforts to fully identify, address and resolve project-related issues through early and continuing coordination.

Scoping

What is Scoping? Scoping is a process designed to examine a proposed project early in the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) analysis and review process. Scoping is intended to identify the range of issues raised by the proposed project and to outline feasible alternatives or mitigation measures to avoid potentially significant environmental effects. The Scoping process inherently stresses EARLY consultation with local agencies, responsible agencies, review agencies, trustee agencies, cooperating agencies, tribal governments, elected officials, interested/affected individuals, any other stakeholders, and any federal agency whose approval or funding of the proposed project will be required for completion of the project.

Scoping is considered an effective way to bring together and resolve the concerns of other agencies and individuals who may potentially be affected by the proposed project, as well as other interested persons, such as the general public, who might not be in agreement with the action on environmental grounds.

Scoping Procedures for the Proposed Full Interchange Project. The environmental document for this project was a routine Environmental Assessment (EA), not an EIS. The California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) regulations do not require an EA to undergo formal Scoping procedures. However, consistent with Caltrans' early involvement philosophy, and in light of the project's vital importance, scoping procedures were undertaken.

The hope was to ensure that the concerns of ALL stakeholders were known early in the process and incorporated into the environmental analyses and NEPA document. During the Scoping period, Caltrans solicited comments and input from all stakeholders and attempted to ensure their early involvement in the project development and environmental process.

When the proposed but rejected project was consisting of a full interchange, scoping began in 1981 with the project subsequently placed on hold. In 1994, the scoping process was reinitiated with letters sent to elected officials and government agencies (dated June 22, 1994). In addition, public scoping notices (Figure 8) were placed in the following newspapers: *Los Angeles Times* (June 13, 1994), *La Opinion* (June 13, 1994), and *The Los Angeles Sentinel* (June 16, 1994). As shown in Figure 8, the notices described the proposed project and provided an office address and phone number for anyone interested in being added to the mailing list. Comments were received until July 13, 1994. General comments received during scoping consisted of:

- Concerns regarding traffic congestion and mitigation
- Support for the project
- Opposition to the project
- Concerns regarding construction impacts
- Concerns by local property owners

- Business owner concerns
- Traffic issues near Westchester Neighborhood School (located near Arbor Vitae St. and Isis Ave.).

Figure 3-01. Scoping Notice for the Full Interchange Project

STUDY RESULTS AVAILABLE

6/13/93

PROJECT AREA

The California Department of Transportation (CALTRANS) is currently reviewing plans to construct an interchange on Route 405 Freeway at Arbor Vitae Street between the cities of Los Angeles and Inglewood. Generally this interchange may require the acquisition of new Right-of-Way north and south of Arbor Vitae Street, east of I-405. Minor Right-of-Way may also be needed for the associated widening of Arbor Vitae Street.

It is anticipated that the first phase of the project will include the southern portion of the interchange. (Northbound on/off ramps.)

This notice is to solicit public comments on this project, and insure an early involvement of public agencies, interested groups, and individuals in the environmental process.

If you wish to be on the mailing list for future actions, or have any written comments, please submit them by July 13th, 1993 to

Kreg Larson, Senior, Environmental Planning Branch, CALTRANS, District 7
120 S. Spring Street, Los Angeles, CA 90012 213/897-0675

Public Meeting for the Arbor Vitae Street Full Interchange Proposal

A public meeting was held on July 6, 2000 at Inglewood City Hall, in the City of Inglewood. The meeting was held to give the public opportunity to get familiar, ask questions and comment on various aspects of the full interchange project. As part of the public circulation process, letters to elected officials, government agencies and interested individuals were sent (June 7, 2000). Additionally, Public Notices were published in the Los Angeles Times-South Bay Section, (June 8 & 29, 2000), La Opinion (June 7 & 26, 2000), The Daily Breeze (June 6 & 26, 2000), and the Rapid Publishing Newspaper Group (June 7 & 28, 2000), a service that places special emphasis in the African American community.

At the public meeting numerous individuals submitted comment cards to Caltrans. General issues discussed at the public meeting consisted of:

- Support for the project
- Opposition to the project
- Expansion of Los Angeles International Airport
- Air quality concerns
- Noise Concerns
- Additional property acquisition concerns
- Adequacy of the Draft Initial Study/Environmental Assessment
- Concerns over the use of Oak Street Elementary School
- Concerns over possible Title VI violations
- Traffic concerns

Comments Received Public Circulation for the Full Interchange Proposal

A total of 25 comment letters and approximately 92 comment cards were received during the comment period. The official public comment period was from June 6, to July 21, 2000. However based on requests from the Inglewood Unified School District and the LAXEN (LAX Expansion No) group, the comment period was extended to July 28, 2000. Additionally, the LAXEN group submitted three (3) opposition petitions ("Petition to California Department of Transportation" 900 signatures, "Community Objection Letter" 313 signatures, and Declaration of Health Concerns 341 signatures) each containing signatures from area residents (many identical signatures can be found on all three petitions). Samples of each petition can be found in Appendix VII. Copies of the all comment letters are also provided in Appendix VII. Comment letters were received from the following:

- Dr. Steve Smith (South Coast Air Quality Management District)
- Mr. George F. Gerard
- Mr. Tony Cerda
- Mr. Mike Elder (2)
- Mrs. Charles Heath
- Mr. Marcus Deemer
- Mr. James T. Blomquist (Sierra Club Representative)
- Mr. Roy Hefner (LAX Airport Area Advisory Committee)
- Dr. James Harris, Mrs. Alice Grigsby (Inglewood Unified School District)
- Mrs. Elizabeth Khoury
- Shute, Mihaly & Weinberger LLP, Christy H. Taylor (representing City of El Segundo)
- Mr. David Yamahara (Los Angeles County Public Works)
- Terry Roberts (Governor's Office of Planning and Research)
- Mrs. Diane Sambrano
- Mr. Charles A. DeDeurwaerder
- Bahram Fazeli, Communities for a Better Environment

- Michael A. Rembis, FACHE, Chief Executive Officer, Centinela Hospital
- Adam Miller, Managing Director, Great Western Forum
- Donald H. Eiesland, President/CEO, Inglewood Park Cemetary
- Tom Bowling, Vice President & General Manager, Hollywood Park Casino
- Rick Baedeker, President, Hollywood Park
- G. Michael Finnigan, President, Realty Investment Group, Inc.
- Jay W. Kim, Senior Transportation Engineer, Los Angeles Department of Transportation
- Susan Baker Ducey, Vice President, Business Planning & Community Development, Daniel Freeman Hospitals Inc.

Figure 3-02. Public Hearing Notice for the Proposed but Rejected Half Interchange Proposal

<p>ANNOUNCEMENT OF PUBLIC HEARING</p> <p>for the Interstate 405/Arbor Vitae Street New Southbound Half Interchange Project</p> 	
	
<p>What's Being Planned?</p>	<p>The California Department of Transportation ("Caltrans") proposes to construct a new south-half interchange on the I-405, at Arbor Vitae Street, in the City of Inglewood. The new half interchange would provide a new southbound on-ramp to the I-405 from Arbor Vitae Street, as well as, a new northbound off-ramp from the I-405 to Arbor Vitae Street. This would create, from the I-405, a new direct vehicle access to and from the Hollywood Park Casino, the University of West Los Angeles, the Forum, and Centinela Hospital. The project's purpose is to reduce congestion at the Century Boulevard and Manchester Boulevard interchanges through the creation of this new direct vehicle access.</p>
<p>Why This Ad?</p>	<p>A public hearing will be held to allow any interested individuals an opportunity to discuss certain design features of the project with Caltrans staff, view the proposed plan, and make comments before the final design and alternative is selected.</p>
<p>What's Available?</p>	<p>The project Environmental Assessment/Initial Study (EA/IS) is available for viewing and download at http://www.dot.ca.gov/dist07/resources/envdocs/, and is available for review and copying at the Caltrans District 7 Division of Environmental Planning (100 S. Main Street, Los Angeles) on weekdays from 8:00 a.m. to 4:30 p.m. The EA/IS is available at the Inglewood Main Library located at 101 W. Manchester Blvd., Inglewood, CA 90301 and also at the Los Angeles Public Library – Westchester-Loyola branch, located at 7114 W. Manchester Ave., Los Angeles, CA 90045.</p>
<p>Where Do You Come In?</p>	<p>The public hearing will be held:</p> <p>Tuesday, January 19, 2010 6pm to 8pm Crozier Middle School, Auditorium 120 West Regent Street Inglewood, CA 90301</p> <p>If you cannot attend, but have comments, please submit your written comments no later than Wednesday, February 3, 2010 to:</p> <p style="text-align: center;">Mr. Ronald Kosinski Deputy District Director Division of Environmental Planning (Arbor Vitae) California Department of Transportation 100 South Main Street MS 16A Los Angeles, CA 90012</p> <p>Individuals who require special accommodation (American Sign Language interpreter, accessible seating, documentation in alternative formats, etc.) are requested to contact the Department's Public Affairs Office at 213-897-3656 at least 21 days prior (Tuesday, December 29, 2009) to the scheduled hearing date. TDD users may contact the California Relay Service TDD line at 1-800-735-2929 or Voice Line at 1-800-735-2922.</p>
<p>Contact</p>	<p>For additional information, please contact Mr. Eduardo Aguilar at (213) 897-8492.</p>
<p style="text-align: center;">Thank you for your interest in this transportation project <i>Caltrans improves mobility across California!</i></p>	

A public hearing to discuss the current and rejected project was held January 19, 2010. The public hearing court reporter transcript and public hearing informational materials are included in the appendices of this environmental document.

Consultation and Coordination

PID Phase of the Half Interchange Project. The Project Initiation Document (PID) phase of the project is the time during which the project’s feasibility, schedule, cost, impacts, and design alternatives are studied at a preliminary and conceptual level. Coordination with the project’s primary stakeholders begins during this phase. In this case, the project began this phase in cooperation with the Los Angeles Department of Airports (LADOA) in June 1976 when the LADOA sent a letter to Caltrans stating that the construction of the Arbor Vitae Interchange could reduce congestion along Century Boulevard and Manchester Avenue.

Value Analysis Phase of the Half Interchange Project. Value Analysis (VA) or Value Engineering (VE) is a function-oriented, structured, multi-disciplinary team approach to solving problems or identifying improvements. The goal of any VA Study is to: Improve value by sustaining or improving performance attributes (of the project, product, and/or service being studied) while at the same time reducing overall cost (including lifecycle operations and maintenance expenses).

During this phase of the project, multi-agency, multi-disciplinary team was assembled to study the existing alternatives alongside Caltrans, propose new design alternatives, and drop existing design alternatives as necessary. This phase was conducted on the following dates: April 24, May 22 through 26, and July 18, 2006.

The stakeholders whom were invited and attended were representatives of the City of Inglewood Public Works Department, the City of Los Angeles Department of Transportation, and the Los Angeles County Metropolitan Transportation Authority. On the next two pages is Table 25, the Value Analysis Attendance Grid.

Table 25. Value Analysis Attendance Grid

MEETING ATTENDEES <i>LA 405 South Half Arbor Vitae Interchange</i>							Caltrans				
2006							TELEPHONE	FAX			
May						July	E-MAIL				
22	23	24	25	26	18	NAME	ORGANIZATION	POSITION			
X	X	X	X	X	X	Fred Kolano	Value Management Strategies, Inc.	VA Study Team Leader	970	216-1739 (C)	242-5531 (O)
									fred@vms-inc.com		
X	X	X	X	X		Tomas Carranza	LADOT	Transportation Engineer	310	642-1624	213 485-1285
									tcarranz@dot.lacity.org		
X	X	X	X	X		Eck Chaiboomma	MTA	Project Manger	213	922-3014	
									chaiboomma@metro.net		
X	X	X	X	X		Daniel Cortez	Caltrans District 7	Project Studies	213	897-5402	
									Dan_cortez@dot.ca.gov		
X	X	X	X	X		Sarah Horn	Caltrans District 7	DTM	213	897-5631	
									Sarah_horn@dot.ca.gov		
X	X	X	X	X	X	Andrew Rittenhouse	Caltrans HQ ESC	Structures Design	916	227-8241	
									Andrew_rittenhouse@dot.ca.gov		
X	X	X	X	X		Marlon Sarmiento	Caltrans District 7	Maintenance Design	213	897-4215	
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X	X	X	X	X		Zarif Saykali	Caltrans District 7	Construction	310	649-1821	
									Zarif_saykali@dot.ca.gov		
X	X	X	X	X		Barney Vorreiter	Caltrans District 7	Design	855	555-3118	
									Barney_vorreiter@dot.ca.gov		

Table 25. Value Analysis Attendance Grid (cont.)

MEETING ATTENDEES <i>LA 405 South Half Arbor Vitae Interchange</i>								Caltrans				
2006							NAME	ORGANIZATION	POSITION	TELEPHONE		FAX
22	23	24	25	26	27	28				E-MAIL		
X	X	X	X	X	X	X	James Vu	Caltrans District 7	Project Studies	213	897-0116	
										James_Vu@dot.ca.gov		
X	X	X	X	X	X	X	John Vassiliades	Caltrans District 7	Project Manager	213	897-7395	
										John_vassiliades@dot.ca.gov		
X			X	X	X		Mario Gutierrez	Caltrans District 7	Design Manager	213	897-0512	
										Mario_gutierrez@dot.ca.gov		
X	X		X	X	X		James Tucker	Caltrans District 7	Design	213	897-0679	
										James_tucker@dot.ca.gov		
				X			James Okazaki	LADOT	Assistant General Manager	213	897-8426	972-8410
										jokazaki@dot.lacity.org		
				X			Renee Berlin	MTA	Director South Bay Area Planning Team	213	922-3055	
										berlinr@metro.net		
			X		X		Jim DeLuca	Caltrans HQ Design	Project Development Coordinator	916	653-4067	
										Jim_Deluca@dot.ca.gov		
X							Jason Roach	Caltrans District 7	Environmental Planning			
										Jason_roach@dot.ca.gov		
X	X	X	X	X	X	X	Jamal El-Jamal	Caltrans District 7	District VA Coordinator	213	897-0479	
										Jamal_k_El-jamal@dot.ca.gov		

MEETING ATTENDEES <i>LA 405 South Half Arbor Vitae Interchange</i>								Caltrans				
2006							NAME	ORGANIZATION	POSITION	TELEPHONE		FAX
22	23	24	25	26	27	28				E-MAIL		
X	X	X	X	X	X	X	Massoud Nabifar	Caltrans District 7	VA Coordination	213	897-0994	
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X	X	X	X	X	X	X	Duke Nguyen	Caltrans District 7	VA Support	213	897-4195	
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				X			William Barnett	City of Inglewood Public Works	Senior Transportation Planner	310	412-5333	
										wbarnett@cityofinglewood.org		
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										Jarrel_B_Kam@dot.ca.gov		
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										Elaheh_yadegar@dot.ca.gov		
				X			Raja Mitwasi	Caltrans District 7	Deputy District Director	213	897-0362	897-0360
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				X			John Njorogf	Caltrans District 7	Right of Way Coordinator	213	897-1685	
										John_njorogf@dot.ca.gov		

Pre-Scoping Phase of the Full Interchange Project. This project was first proposed in 1980 and to be constructed in 1984. However, there is no record of specific actions prior to the Scoping Phase that occurred in 1994 of the project except for the June 1976 letter that LADOA sent to Caltrans proposing the construction of the Arbor Vitae Interchange.

Scoping Phase of the Half Interchange Project. During the Scoping phase of the project, Caltrans conducted the following outreach efforts discussed previously in the Scoping Procedures of this document earlier in Chapter 3 Comments and Coordination.

Post-Scoping Phase of the Full Interchange Project. The Scoping phase of the project was completed in 1994 and no additional outreach efforts were performed by Caltrans staff. Correspondence between stakeholders and Caltrans staff can be viewed in the appendices section of this document. Much opposition and little support was conveyed to the project by individuals in the communities of Inglewood and Manchester.

Draft EA/IS Public Comment Period and Public Hearing. Caltrans has sent the Draft EA/IS to all of the project stakeholders discussed in the aforementioned Scoping section, as well as the numerous new individuals that were added to the project mailing list during the previous Public Comment Period in 2000 and 2006. To view the project mailing list, please refer to the appendices section of this document.

Caltrans solicited questions, comments, and concerns from all stakeholders regarding the proposed project and its potential environmental and community impacts as discussed in this Environmental Assessment. The Department held a public hearing on January 19, 2010 so that all stakeholders were able to voice their questions, comments, and concerns in person. All written comments received during the Public Comment Period, as well as verbal comments made at the public hearing, are considered formal comments and are part of the public record.

The Draft EA/IS and Availability Notification letters and newsletters were sent to all stakeholders listed in the project mailing list located in the appendices section of this environmental document. Draft EA/IS Availability Notification newspaper ads were run in the same newspapers that were used during the previous Public Comment Period and Public Hearing phase of the project in 2000.

The Draft EA/IS Availability Notification letters, newsletters, and newspaper ads provided all of the specific details as they did during the Scoping phase of the project. Again, much opposition and little support was conveyed to the project by individuals in the communities of Inglewood and Manchester. Comments on the Draft Environmental Document were made in writing and spoken at the Public Hearing and during the comment period that began December 21, 2009 and concluded on February 3, 2010. These detailed comments are considered and responded to in Appendix B.

The following activities were completed by Caltrans staff and the Consensus Consulting Incorporated Group in 2009 and 2010:

- Elected official briefing on June 17, 2009 Session #1- Staff for Councilmember Morales and Sen. Rod Wright
- Elected official briefing on June 17, 2009 Session #2- Staff for Councilmember Rosendahl and Supervisor Mark Ridley-Thomas, Mayor Dorn, and City of Inglewood Councilmember Morales on July 9, 2009
- City of Inglewood Planning Director Wanda Williams and staff on July 29, 2009
- Inglewood Councilmember Morales Right-of-Way briefing on July 29, 2009
- Community Walk Report and Log - July 29, July 31 and August 5, 2009
- Walk of impacted properties within Right-of-Way
- Walk of businesses along Arbor Vitae
- Meeting with Inglewood Unified School District Superintendent Joice Lewis and Chief Operating Officer/Facilities Director Robert Guillen October 1, 2009
- Meeting with Area Homeowners Associations and Area Chambers of Commerce October 1, 2009
- Oak Street Elementary School Principal Richard Barter presented project information and the fact sheet provided by Consensus Incorporated to the Oak Street Elementary School PTA Meeting on October 24, 2009.
- The Public Comment Period: December 21, 2009 to February 3, 2010
- Public Hearing: January 19, 2010 at Crozier Middle School from 6PM to 8PM

- Briefing with Westchester Neighborhood Council: Tuesday, January 5, 2010
- City of Los Angeles and Los Angeles DOT Meeting January 13, 2010
- Responses provided to Public Comments: May 1, 2010 to August 19, 2010

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Ms.			County of Los Angeles, Department of Public Works	Agencies		CA	
Mr.	Donald L. Wolfe	Director	County of Los Angeles, Department of Public Works	Agencies	P.O. Box 146	Alhambra CA 91802-146	
Mr.			County of Los Angeles, Department of Public Works	Agencies	Programs	1900 S. Fremo	Alhambra CA 91803
Mr.	Frank Meneses	Administrat	County of Los Angeles, Department of Regional Planning	Agencies	320 West Ten	Los Angeles CA 90012	
Ms.	Marta Mack	Metro		Transportation Agenci	One Gateway	Los Angeles CA 90012	
Mr.	Randy Lamm	Metro		Transportation Agenci	One Gateway	Los Angeles CA 90012	
Ms.	Rebecca DeLeon	Metropolitan Water District		Agencies	700 North Ala	Los Angeles CA 90012	
Mr.				Media		CA	
Mr.				Media		CA	
Mr.				Media		CA	
	Hiddo Netto	Editor		Resource Agencies	1400 Tenth Street, Room	CA	
		Chief, Bure	California Department of Education	Resource Agencies	1430 N Street	Sacramento CA 95814	
		Director		Resource / Governor's Office of Plan		Sacramento CA 95814	
Mr.	Larry Eng		Department of Fish and Game	Resource Agencies	4949 Viewridg	San Diego CA 92123	
		Environme	Department of Housing and Urban Development	Resource Agencies	600 Harrison	San Francisco CA 94107	
		EIS Coordi	U.S. Environmental Protection Agency	Resource Agencies	75 Hawthorne	San Francisco CA 94105-394	
		U.S. Environmental Protection Agency		Resource / Office of F	1000 Pennsylv	Washington DC 20460	
Updated			Federal Aviation Administration	Resource Agencies	15000 Aviatio	Hawthorne CA 90250	
Mr.	Clifford Rustad	AWP474	Federal Aviation Administration	Resource Agencies	P.O. Box 920	Los Angeles CA 90009	
Mr.	Dennis E. Roberts	Chief, Airp	Federal Aviation Administration	Resource / AWP-600,	P.O. Box 920	Los Angeles CA 90009	
Ms.	Karen E. Armes	Regional D	Federal Emergency Management Agency	Resource / Region 9	1111 Broadw	Oakland CA 94607	
Mr.	Cesar Perez	Senior Tra	Federal Highway Administration	Resource Agencies	650 Capitol M	Sacramento CA 95814	
			Federal Transit Administration, Region 9	Resource Agencies	201 Mission S	San Francisco CA 94105	
Mr.	Caroline H. Krewson	Area Direct	Department of Housing and Urban Development	Resource Agencies	611 W. Sixth	Los Angeles CA 90017	
	Willie R. Taylor	Director	Department of the Interior	Resource Agencies	Main Interior E	Washington DC 20240	
	Terry Roberts	State Clearinghouse Director		Resource Agencies	1111 Jackson	Oakland CA 94607	
Mr.	Rudolf Montiel	Executive I	City of Los Angeles, Housing Authority	Agencies	2600 Wilshire	Los Angeles CA 90057	
Mr.	Agbor Agbor		City of Los Angeles, Housing Authority	Agencies	2600 Wilshire	Los Angeles CA 90057	
Mr.	Jay Kim	Senior Tra	City of Los Angeles, Department of Transportation	Agencies	100 S. Main S	Los Angeles CA 90012	
Mr.	Roy Romer	Office of th	Los Angeles Unified School District	Education	333 S. Beaudi	Los Angeles CA 90017	
Ms.	Carol Inge	Interim Chi	Metropolitan Transportation Authority	Agencies Planning	1 Gateway Pl	Los Angeles CA 90012-293	
		Director, O	National Oceanic and Atmospheric Administration	Agencies	Torrance T	20500 Madror	Torrance CA 90503-369
The Honorable	Larry Myers	Executive	California Native American Heritage Commission	Agencies	14th Street &	Washington DC 20230	
The Honorable	Martin Alcala		Native American Tribal Councils	Electeds-Federal	915 Capitol M	Sacramento CA 95814	
				Electeds-Federal	P.O. Box 909	Marina Del CA 90292	
					761 Terminal	St., Bldg 1,	
					2nd Fl.		
The Honorable	Virginia Carmelo	Chair	Gabrielino/Tongva Tribe of the Los Angeles Basin	Electeds-Federal		Los Angele CA 90021	
Ms.	Jamee Jordan Patterson	Office of the Attorney General		Agencies	P.O. Box 944	Sacramento CA 94244	
Mr.	Haripal Vir	Principal Ti	City of Los Angeles, Office of Transportation	Agencies	100 S. Main S	Los Angeles CA 90012	
		Chief, Envi	Project Development and Management	Agencies	400 P Street,	Sacramento CA 95814	
					Sensitive Receptors	CA	
					Sensitive Receptors	CA	
Mr.	Steve Smith	Program S	South Coast Air Quality Management District	Resource Agencies	21865 E. Copi	Diamond B CA 91765	
Ms.	Valerie Carrillo	Director,	Los Angeles Regional Water Quality Control Board (RWQ)	Resource Agencies	320 W. 4th St	Los Angeles CA 90013	
		Executive I	U.S. Department of Energy	Resource Agencies	1000 Indepen	Washington DC 20585	
Ms.	Mary Loquvam	President	Los Angeles Audubon Society	Environmental Groups	7377 Santa M	West Holly CA 90093	
Mr.	David DeLange	Director	Sierra Club	Environmental Groups	3435 Wilshire	Los Angeles CA 90010-190	
Mr.	Ron Silverman	Conservati	Sierra Club	Environme	Los Angele	3435 Wilshire	Los Angeles CA 90010-190
Ms.	Jennifer Robinson	Executive I	California Native Plant Society	Environmental Groups	2727 K Street	Sacramento CA 95814	
Ms.	Tara Hansen		Southern California Association of Governments	Transporta Planning	at 818 W. 7th. S	Los Angeles CA 90017	
	Laverne Jones		Southern California Gas Company	Utilities	SBE PAR 78141	Gulana / Playa Del F CA 90293	
Mr.	Cynthia Bryant	Director	State of California, Governor's Office of Planning and Res	Agencies	State Clear	P.O. Box 304	Sacramento CA 95812-304
Mr.	David Castanon	Chief Regu	U.S. Army Corps of Engineers	Resource Agencies	P.O. Box 532	Los Angeles CA 90053	
Ms.	Susan A. DeSaddi	Project Ma	U.S. Army Corps of Engineers	Resource / Los Angele	P.O. Box 532	Los Angeles CA 90053-232	
		Office of th	U.S. Department of Agriculture	Resource Agencies	1400 Indepen	Washington DC 20250	
		Director, O	U.S. Department of Commerce, Room 6800	Resource Agencies	14th & Consti	Washington DC 20230	
		Director, O	U.S. Department of Interior	Resource / Main Interi	1849 C Street	Washington DC 20240	
Mr.	David Zoutendyk	North San	U.S. Fish and Wildlife Service	Resource Agencies	6010 Hidden	Carlsbad CA 92011	
The Honorable	Trevor Daley	Senior Fiel	United States House of Representatives, District 27	Electeds - Federal	11111 Santa	Los Angeles CA 90025	
The Honorable		Congress I	United States House of Representatives, District 28	Electeds - Federal		CA 91411	
The Honorable	Barbara Boxer	Senator	United States Senate	Electeds - Federal	112 Hart Sen	Washington DC 20510	
Mr.	Adolfo Bailon	Senior Fiel	United States Senate	Electeds - I	Electeds Off	312 N. Spring	Los Angeles CA 90012
The Honorable	Dianne Feinstein	Senator	United States Senate	Electeds - Federal	331 Hart Sen	Washington DC 20510	
			USDA Natural Resources Conservation Service	Resource / Lancaster	:44811 N. Dat	Lancaster CA 93534	
			USDA Natural Resources Conservation Service	Resource / Southern	C4500 Glenwoc	Riverside CA 92501	
Ms.	Janet Hashimoto	U.S. Environmental Protection Agency, Region 9		Resource Agencies	75 Hawthorne	San Francisco CA 94105	
Officer		Area Commanding Officer		Agencies		CA	
				Chamber of Commerce		CA	

APPENDICES

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APPENDIX A: TITLE VI POLICY STATEMENT

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE DIRECTOR
1120 N STREET
P. O. BOX 942873
SACRAMENTO, CA 94273-0001
PHONE (916) 654-3266
FAX (916) 654-6608
TTY (916) 653-4086



*Flex your power!
Be energy efficient!*

August 25, 2009

TITLE VI POLICY STATEMENT

The California State Department of Transportation under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person in the State of California shall, on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.


RANDELL H. IWASAKI
Director

"Caltrans improves mobility across California"

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APPENDIX B: RESPONSES TO COMMENTS

A1 Native American Heritage Commission
A2 County Sanitation Districts Of Los Angeles County
A3 Office Of Inglewood City Councilman Eloy Morales
A4 City Los Angeles Department Of Transportation (LADOT)
A5 County Of Los Angeles Department Of Parks And Recreation
A6 City Of Inglewood Department Of Planning And Building
A7 United States Environmental Protection Agency
A8 City Of Inglewood Department Of Public Works
A9 Governor's Office Of Planning And Research
A10 South Coast Air Quality Management District
C1 Jane and Marcus A Deemer Letter
C2 Daniel Walker Letter
C3 David Coffin Letter
C4 Denny Schneider, President, Alliance for a Regional Solution to Airport Congestion Letter
C5 Danna Cope Letter
C6 Noel W Houser Letter
P1 Clara Gonzalez Written Comment
P2 John Bowman Written Comment
P3 Jerry McAliney Written Comment
P4 Tina McKinnor Written Comment
P5 Darryw Harris Written Comment
S1 Claydine Burt Spoken Comment
S2 David Coffin Spoken Comment
S3 Anthony Cappa Spoken Comment
S4 Noel Houser Spoken Comment
S5 Diane Sambrano Spoken Comment
S6 Keith Lockard Spoken Comment
S7 Noel Houser Spoken Comment
T1 Keith Lockard Comment in Public Hearing Transcript
T2 Anthony Cappa Comment in Public Hearing Transcript
T3 Diane Sambrano Comment in Public Hearing Transcript
T4 David Coffin Comment in Public Hearing Transcript
T5 Jerry McAliney Comment in Public Hearing Transcript
T6 Claydine Burt Comment in Public Hearing Transcript
T7 Cecil Careio Comment in Public Hearing Transcript

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STATE OF CALIFORNIA
 NATIVE AMERICAN HERITAGE COMMISSION
 915 CAPITOL MALL, ROOM 264
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 667-6390
 Web Site www.nahc.ca.gov
 e-mail: ds_nahc@pacbell.net

Arnold Schwarzenegger, Governor



January 4, 2010

Mr. Eduardo Aguilar
CALIFORNIA DEPARTMENT OF TRANSPORTATION – DISTRICT 7
 100 South Main Street – MS 16A
 Los Angeles, CA 90012

Re: SCH#2000061039 CEQA Notice of Completion: Initial Study for the Interstate 405 at Arbor Vista Street, New South Half Interchange Project, located in the City of Inglewood, Los Angeles County, California

Dear Mr. Aguilar:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson (1985) 170 Cal App. 3rd 604*) The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. The NAHC is a 'Participating Agency' with Caltrans. To adequately assess the project-related impacts on historical resources, the Commission recommends the following:

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within one-half mile of the APE. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.

Consultation with tribes and interested Native American tribes and individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] et seq), 36 CFR Part 800.3, the President's Council on Environmental Quality (CEQ; 42 U.S.C. 4371 et seq) and NAGPRA (25 U.S.C. 3001-3013), as appropriate.

Caltrans Response #1:

A1

A. Comment noted.

B. This project has completed compliance with the Department of Transportation Act of 1966 and the National Historic Preservation Act of 1966, specifically Section 106.

C. As such, consultation with the Native American Heritage Commission was previously carried out (including a search of the Sacred Lands file).

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

Caltrans Response #1 Continued:

C. Also consultation was carried out with interested Native American community members as part of the compliance effort. The result was that no cultural resources were identified in the Area of Potential Effect either from surveys, information reviews, or consultations.

Native American Contacts
Los Angeles County
January 4, 2010

<p>LA City/County Native American Indian Comm Ron Andrade, Director 3175 West 6th Street, Rm. Los Angeles , CA 90020 (213) 351-5324 (213) 386-3995 FAX</p>	<p>Gabrielino Tongva Nation Sam Duniap, Tribal Secretary P.O. Box 86908 Los Angeles , CA 90086 samdunlap@earthlink.net (909) 262-9351 - cell</p>
<p>Ti'At Society Cindi Alvitre 6515 E. Seaside Walk, #C Long Beach , CA 90803 calvitre@yahoo.com (714) 504-2468 Cell</p>	<p>Gabrielino Gabrielino Tongva Indians of California Tribal Council Robert F. Doramae, Tribal Chair/Cultural P.O. Box 490 Bellflower , CA 90707 gtongva@verizon.net 562-761-6417 - voice 562-925-7989 - fax</p>
<p>Tongva Ancestral Territorial Tribal Nation John Tommy Rosas, Tribal Admin. tattnlaw@gmail.com 310-570-6567</p>	<p>Gabrielino Tongva Gabrielino-Tongva Tribe Bernie Acuna 501 Santa Monica Blvd, # Santa Monica CA 90401 (310) 587-2203 (310) 428-7720 - cell (310) 587-2281</p>
<p>Gabrieleno/Tongva San Gabriel Band of Mission Anthony Morales, Chairperson PO Box 693 San Gabriel , CA 91778 (626) 286-1262 -FAX (626) 286-1632 (626) 286-1758 - Home (626) 286-1262 Fax</p>	<p>Gabrielino Gabrieleno Band of Mission Indians Andy Salas, Chairperson PO Box 393 Covina , CA 91723 gabrielenoindians@yahoo. 626-926-4131 (213) 688-0181 - FAX</p>

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7090.5 of the Health and Safety Code, Section 6097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, Federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106, and federal NAGPRA.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2000051039; CEQA Notice of Completion; Initial Study for the Interstate 405 at Arbor Vista Street; New South Hill Interchange Project; located in the City of Inglewood; Los Angeles County, California.

Native American Contacts
Los Angeles County
January 4, 2010

Gabrielino-Tongva Tribe
Linda Candalaria, Chairwoman
501 Santa Monica Blvd, # Gabrielino
Santa Monica CA 90401
(310) 587-2203
310-428-5767- cell
(310) 587-2281
lcandalaria1@gabrielinoTribe.org

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106, and federal NAGPRA.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2000061039; CEQA Notice of Completion; Initial Study for the Interstate 405 at Arbor Vista Street; New South Hall Interchange Project; located in the City of Inglewood; Los Angeles County, California.



COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

STEPHEN R. MAGUIN
Chief Engineer and General Manager

January 12, 2010

File No: 05-00.04-00

Mr. Ronald Kosinski, Deputy District Director
California Department of Transportation
Division of Environmental Planning
(405 Arbor Vitae Interchange)
100 South Main Street MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Interstate 405 Arbor Vitae New South Half Interchange Project

The County Sanitation Districts of Los Angeles County (Districts) received a Proposed Mitigated Negative Declaration for the subject project on December 23, 2009. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments:

- The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Ms. Martha Tremblay of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

Ruth I. Frazen
Ruth I. Frazen
Customer Service Specialist
Facilities Planning Department

RIF:rf
c: M. Tremblay

Doc #: 1455964.1



Caltrans Response #2:

A. Sewer District's requirements are duly noted and will be followed during the design phase of the project, should the half-interchange project move forward. The project is on hold at this time as the No-Build Alternative will be identified as the Preferred Alternative.

FEB-02-2010 02:47 PM

P. 1 / 8



Cherishing Our Past - Embracing Our Future
CITY OF INGLEWOOD
One W. Manchester Boulevard Inglewood, CA 90301-1750



Vacant
Mayor

CITY COUNCIL

DANIEL K. TABOR
Councilmember
District No. 1

JUDY DUNLAP
Councilmember
District No. 2

ELOY MORALES, JR.
Councilmember
District No. 3

RALPH L. FRANKLIN
Councilmember
District No. 4

TIMOTHY E. WANAMAKER
City Administrator

SHELDON CURRY
Assistant City Administrator/
Development

JEFF MUIR
Assistant City Administrator/
Chief Financial Officer

MICHAEL D. FALKOW
Deputy City Administrator/
Chief Information Officer

ONE MANCHESTER BOULEVARD
INGLEWOOD, CALIFORNIA
90301-1750

MAYOR AND CITY COUNCIL / ADMINISTRATIVE OFFICE
TELEPHONE: (310) 412-5301 - FAX: (310) 412-8788

DATE: Feb. 3, 2010

TO: EdUARdo Aguilera

FAX NUMBER: (213) 897-0685

COMPANY: CATTANS

FROM: Councilman Eloy Morales, Jr.
(D. Brown)

SUBJECT: Public Comments - Arthur Vitae
Interchange Project.

Please include the attached comments
As public comments RE: Arthur Vitae Project.
D. Brown (310) 412-5301

THIS IS PAGE 1 OF 8

IF YOU HAVE ANY QUESTIONS REGARDING THIS TRANSMISSION,
PLEASE CALL THE SENDER AT THE NUMBER INDICATED ABOVE.

FEB-02-2010 02:48 PM

P. 2/ 8

A3

Inglewood



California

Eloy Morales, Jr.
Councilman, District 3

February 2, 2010

To Whom It May Concern:

The purpose of this accompanying letter is to forward a petition delivered to my office by residents of Inglewood in opposition of Cal Tran's planned 405 fwy Arbor Vitae on/off ramp.

Thank you,

Eloy Morales, Jr.
Council Member, District 3
City of Inglewood

One Manchester Blvd./P.O. Box 6500/Inglewood, California 90312/(310) 412-5320/Fax (310) 412-8788/www.cityofinglewood.com

FEB-02-2010 02:48 PM

P. 3/ 8

A3

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN AND THEN REBUILDING THE ARBOR VITAE STREET BRIDGE, ADDING TWO NEW RAMPS AND BUYING PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN, ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
1. Lucriste Lingco	1146 S. Truro	90301
2. Alene Runkin	1885 Truro	90301
3. Rocio Garcia	1009 Truro	90301
4. ALBERTO BROZCO	1132 S. FLY AVE	90301
5. Rula	1011 STRURO AVE	90301
6. At Camelia	1023 S. TRURO AVE	90301
7. Laura I. Ortega	1033 S. Truro ave	90301
8. Rosasi Zayas	227 W. Hardy	90301
9. William Turner	252 W. Hardy St	90301
10. James Gonzalez	1117 S. Truro Ave	90301
11. Robert Quintero	1135 TRURO AVE	90301
12. Gina Marin	1121 S. Truro Ave	90301
13. John	1129 S. Truro ave	90301

Caltrans Response #3:

A. Thank you for your comments. Caltrans has identified the No-Build Alternative as the Preferred Alternative.

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P. 4/8

A3

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
AND THEN REBUILDING THE ARBOR VITAE STREET
BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
14. Salvador	1217 STAURO AVE	90301
15. EDUARDO	1232 STAURO AVE	90301
16. LEONARDO	1230 STAURO AVE	90301
17. Oscar	1222 S. TRURO AVE	90301
18. Josue	1218 S. Truro Ave.	90301
19. Dr. HSL	1206 STUORO AV	90301
20. Adia	1206 S. Truro AV	90301
21. Johnson	216 W 98TH ST	90301
22. Felix De Leon	1130 Truro AV	90301
23. Claudia Lopez	1142 Truro Ave	90301
24. JoAnne Gonzalez	1127 S. Truro Ave	90301
25. Audrey Cunniff	1124 SO. TRURO AV	90301
26. Richard Solomon	1120 STAURO	90301

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A3

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
AND THEN REBUILDING THE ARBOR VITAE STREET
BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
27. Victor Marmolejo	1036 STURRO AVE	90301 90301
28. Teresa Marmolejo	1036 Sturro Ave	90301
29. Maria Zuniga	1019-S Truro Ave	90301
30. Brian Allen	1014. S. TRURO AVE	90301
31. Narcisca Mercado	917 S. Oak St.	90301
32. Alfredo Andrade	706 Arbor Vitae St	90301
33. Elvia Castañeda	909 SASH AVE	90301
34. Isma Graciano-Ag	952 S. Ash Ave	90301
35. Jorge Aguayo	952 S. ASH AVE	90301
36. MARIO CORDOVA	5034 95ST	90301
37. Kristi Hill	9510 Ocean Gate Ave.	90301
38. Veronica Sepulveda	9518 Ocean Gate Ave	90301
39. Melissa Arnold	9528 Ocean Gate Ave	90301

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A3

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
AND THEN REBUILDING THE ARBOR VITAE STREET
BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
40. Mike Luchini	9536 Ocean Gate Ave	90301
41. Araceli Sanchez	1032 S. Truro Ave	90301
42. Elpidio Poyano	1032 Truro AV.	90301
43. Sandy Davine	933 Kenwood street	90301
44. Jose Jiviz	949 Kenwood	90301
45. Joel Stgo	949 Kenwood	90301
46. Elvie Cuevas	5046 W. 95th St.	90301
47. Montez Benjamin	5044 W 95th St	90301
48. Eric Jones	5046 W. 95th Street	90301
49. Jorge Galero	5034 W. 95 St	90301
50. Eugenio Perez	9511 Redfern Ave	90301 Inglewood
51. Alan C.	5034 W 95th St	90301 Inglewood
52. Carlos Jimenez	5034 W 95th St	90301

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A3

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
AND THEN REBUILDING THE ARBOR VITAE STREET
BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST OF \$7,000,000.

NAME	ADDRESS	ZIP CODE
53. Luis Castillo	7535 Redfern Ave	90301
54. Rosalba Callegon	9601 Redfern Ave	90301
55. Carlos Calderon	9601 Redfern Ave	90301
56. Susana Ramirez	9607 Redfern Ave	90301
57. MARCO GUTIERREZ	7017 REDFERN AV.	70301
58. Rocio Gona	9623 Redfern Ave	90301
59. TOM MAPLE	9807 REDFERN AVE	90301
60. Norma Minoz	9821 Redfern Ave	90301
61. Adelin Pablos	9538 Redfern Ave	90301
62. Daisy Hurtado	9536 Redfern ave	90301
63. Allen Trujillo	5056 W 95th Iny. Ca.	90301
64. Erick Reyes	1523 REDFERN AVE	INGLWOOD CA 90301
65. Nichelle Flores	980 Kennedy St.	90301

FEB-02-2010 02:48 PM

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A3

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
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BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
66. Omar Dalls	939 Kenwood Ave	90301
67. Alice Ferrell	944 Kenwood	90301
68. FERNANDO PEREZ	936 KENWOOD	90301
69. CRISTINA PEREZ	936 KENWOOD	90301
70. Dion Featherstone	930 Kenwood	90301
71. Gilberto Rodriguez	728 Kenwood	90301
72. Andres Sanchez	658 Arborvitae St	90301
73. Ba Duan	1029 S Truro Ave	90301
74. Noel H. Hower	1029 S TRURO AVE	90301
75. Arit Brian Allen	1014 STRURO AVE CA	90301
76. Kimberly Wonders	1023 Tenro Ave CA	90301
77. Ricardo Lopez	1010 S Truro Ave - Kenwood CA	90301
• PEDRO VALCZUELA	1018 S TRURO AV	90301

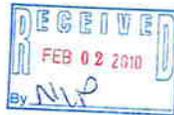
RITA L. ROBINSON
GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA



ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF
TRANSPORTATION
100 S MAIN ST. 10TH FLOOR
LOS ANGELES, CA 90012
(213) 972-8470
FAX (213) 972-8410



February 3, 2010

Mr. Ronald Kosinski, Deputy District Director
State of California
Department of Transportation, District 7
Division of Environmental Planning (Arbor Vitae)
100 South Main Street, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

DRAFT ENVIRONMENTAL ASSESSMENT/INITIAL STUDY-INTERSTATE 405 ARBOR VITAE NEW SOUTH HALF INTERCHANGE PROJECT

The City of Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Assessment Study of the proposed Interstate 405 Arbor Vitae New South Interchange Project and have enumerated our comments as listed in the Attachment. We have also met with your staff to review the proposed project. LADOT supports this project as it will improve access to the surrounding communities including the City of Los Angeles and the City of Inglewood, and should improve traffic flow along the I-405 Corridor.

As funds become available we also recommend construction of the north half of this interchange by providing a new southbound off-ramp and a new northbound on-ramp at Arbor Vitae Street, as it will further improve access to the surrounding communities and further reduce congestion on the I-405 Freeway corridor.

We appreciate a chance to provide input in this environmental document and if you have any questions regarding this matter, please contact Ken Husting, Senior Transportation Engineer at (213)972-5008.

Sincerely,

Harpal Vir
Principle Transportation Engineer

C: Ken Husting, LADOT
Irwin Chodash, LADOT

Caltrans Response #4:

A. Comments noted. Thank you for your comments. Based on the result of the new analysis, the No-Build Alternative has been identified as the Preferred Alternative. Please see Section 1.3.2 for details.

Mr. Ronald Kosinski

-2-

February 3, 2010

ATTACHMENT

1. **Page 10-** In the last sentence on this page you indicate that the project "provides direct access to Los Angeles International Airport (LAX)." The main access to LAX will continue to be from Century Boulevard, Sepulveda Boulevard and the I-105 Glenn Anderson Freeway. Only indirect access to airport-related parking or car rental facilities is likely to be provided from Arbor Vitae Street.

Intuitively, access to the LAX Central Terminal Area for traffic northbound on the I-405 Freeway will only be improved to the degree that traffic exiting the freeway shifts from the northbound Century Boulevard off-ramp to the proposed Arbor Vitae Street off-ramp, thereby decreasing congestion on the Century Boulevard off-ramp. There would be no improvement for motorists who choose to transition from the I-405 Freeway to the westbound I-105 Freeway and use the Sepulveda Boulevard off-ramp. Access to LAX for southbound traffic on the I-405 Freeway will not be improved, since a new southbound on-ramp at Arbor Vitae Street is not being proposed under Alternative 2.

2. **Page 13-** Under Alternative 2, item 1, the width of the roadway overpass should be stated. In addition, the proposed striping on the Arbor Vitae overpass should be indicated. We request the opportunity to review and comment on all proposed project-related signing and striping plans, since it may impact traffic on La Cienega Boulevard, the west half of which is within the City of Los Angeles.

3. **Page 20-** The last sentence on this page: "The Manchester Square Baggage Terminal Project is included in the Westchester-Playa Del Rey Community Plan..." is incorrect. There is no such project with that title. The report may be referring to the proposed Ground Transportation Center in the LAX Master Plan; however, that project is subject to further study and is not included in the Westchester-Playa Del Rey Community Plan. In effect, the last paragraph under "Westchester-Playa Del Rey/Los Angeles County General Plan" should be eliminated.

4. **Page 21-** All references to "LAX Community Plan" should be changed to "LAX Plan." In addition, Los Angeles World Airports is not the "parent company" of LAX, but rather a department of the City of Los Angeles and the agency responsible for managing LAX.

5. **Page 28-** Change "LAX Community Plan" to "LAX Plan."

6. **Page 44-** The report states: "A need for an alternative route between the I-405 and LAX has persisted since the mid-1970s..." This statement ignores the construction of the I-105 Glenn Anderson Freeway since that time as well as the project (currently under construction) to widen the westbound I-105 off-ramp to northbound Sepulveda Boulevard that improves direct access to the airport.

7. **Page 56-** The report states that on a regional scale Vehicle Hours traveled increased by 35,583 hours and vehicle miles traveled increased by 13, 128 miles as shown in Table 34 with Build Alternative 2 versus No-Build Alternative 1. On a smaller sub-regional scale, vehicle hours traveled decreased by 32,776 hours and vehicle miles traveled decreased by 1,942 with Alternative 2 versus Alternative 1 as shown in Table 33. Please clarify why vehicle hours and vehicle miles increased on a regional scale, but decreased on a sub-regional scale.

A4

Caltrans Response #4 Continued:

A. Several errors were made in the Draft Environmental Document in saying that the proposed but rejected project "provide direct access to Los Angeles International Airport." The errors have been corrected in the Final Environmental Document. This is not the case as the project is not adjacent to the entrance of the airport for arriving and departing passengers. The proposed project would provide access to the Hollywood Park Casino and Redevelopment Project, the University of West Los Angeles, Centinela Hospital, and the Forum.

B. As originally proposed, Arbor Vitae St OC would have been widened from 78' to approximately 90' in width. Should the project move forward, signing/stripping plans will be made available to the City of Los Angeles for review.

C. Corrections made to document. Thank you for your corrections.

D. Corrections made to document. Thank you for your corrections.

E. Corrections made to document. Thank you for your corrections.

F. Comment noted. Thank you for your comment.

G. Traffic will increase in the six-county SCAG Region. Traffic will decrease in the area around the proposed build alternative's project study area. Although the build alternative would reduce congestion at Manchester Avenue and Airport Boulevard and Manchester Avenue and Sepulveda Boulevard Intersections but it also create substantial delays at intersections along the Arbor Vitae Boulevard Corridor. This and the fact that FHWA would not grant design exception for a Half Interchange. These events led to Caltrans identifying the No-Build Alternative as the Preferred Alternative in this document.



"Julie Yom"
<jyom@parks.lacounty.gov>
02/03/2010 08:58 AM

To <ron_kosinski@dot.ca.gov>
cc "Norma E. Garcia" <negarcia@parks.lacounty.gov>, "Larry Hensley" <lhensley@parks.lacounty.gov>, "Joan Rupert" <jrupert@parks.lacounty.gov>
bcc
Subject Response to Draft EA/ Initial Study: I-405 Arbor Vitae

Mr. Kosinski,

Please find attached County of Los Angeles Department of Parks and Recreation's response to the above mentioned project.

Sincerely,

Julie Yom

County of Los Angeles

Department of Parks and Recreation
Planning Division
510 S. Vermont Ave.
Los Angeles, CA 90020
Tel. 213) 351-5127 Fax 213) 639-3959

jyom@parks.lacounty.gov


Response to Callions I-405 Arbor Vitae.pdf



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

February 3, 2010

Sent via email: ron_kosinski@dot.ca.gov

Mr. Ronald Kosinski
Deputy District Director
California Department of Transportation
Division of Environmental Planning
100 South Main Street MS 18A
Los Angeles, CA 90012

Dear Mr. Kosinski:

**DRAFT ENVIRONMENTAL ASSESSMENT/ INTIAL STUDY
INTERSTATE- 405 ARBOR VITAE
NEW SOUTH HALF INTERCHANGE PROJECT
07-LA-405 PM 22.2/ 23.4
EA 491600**

The Department of Parks and Recreation has reviewed the above project for potential impact on the facilities under the jurisdiction of the Department. We have determined that the proposed project will not affect any Departmental facilities.

Thank you for including this Department in the environmental review process. If we may be of further assistance, please contact my staff Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Sincerely,

Jean Rupert
Section Head
Environmental & Regulatory Permitting Section

JR:JY:ts/response to CalTrans I-405 Arbor Vitae

c: Parks and Recreation (N. E. Garcia, L. Hensley, J. Yom)

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5198

Caltrans Response #5:

A. Comment Noted. Thank you for your comment.

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P. 01

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**City of Inglewood
Planning and Building Department**

One Manchester Boulevard
Inglewood, CA 90301

310.412.5230 - Planning Office 310.412.5294 - Building Office 310.412.5681 - Fax

FAX COVER SHEET

Date: 2-3-10

To: Ronald Kosinski

Fax #: (213) 897-0685

From: Mindy Wilcox

Subject: I-405/Arbor Vitae Draft EA/IS
Review Comments

Number of pages 12
(Including Cover Sheet)

FEB-03-2010 WED 04:26 PM

FAX NO.

P. 02

Inglewood



California

PLANNING AND BUILDING DEPARTMENT

February 3, 2010

Via fax and USPS

Mr. Ronald Kosinski, Deputy District Director
 California Department of Transportation
 Division of Environmental Planning (405 Arbor Vitae Interchange)
 100 South Main Street MS 16A
 Los Angeles, CA 90012

Subject Environmental Assessment/Initial Study for the I-405 south-half interchange at Arbor Vitae

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Environmental Assessment and Initial Study for the I-405 south-half interchange at Arbor Vitae in Inglewood. We provide you with the following comments:

The Land Use and Noise analyses appear to be adequate. The Air Quality Analysis (and related traffic) is not adequate. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an environmental assessment or mitigated negative declaration must be reviewed in light of what is reasonably feasible. In the EA/Mitigated Negative Declaration, Caltrans has concluded that the interchange project would not have a significant impact on air quality because there will be an overall reduction in traffic volumes and EPA will call for MSAT (Mobile Source Air Toxics) emissions reductions by at least 57 to 87 percent through 2020. However, this does not address local air quality impacts and in particular dispersion of local mobile source emissions—namely ROG (reactive organic gases), NOX (nitrogen oxide) that are precursors of ozone during construction and project operation. EPA has designated the South Coast Air Basin (SCAB) that includes Inglewood as Severe-17 non-attainment for ozone, serious non-attainment for PM10, and non-attainment for PM2.5. The document needs to describe direct construction emission sources from equipment exhaust or fugitive dust and construction worker trips. Will significant grading (pushing and scraping) or excavation (digging and scooping) that requires removal

One Manchester Boulevard / Inglewood, CA 90301 / P.O. Box 6500 / Inglewood, CA 90312 / www.cityofinglewood.org
 (310) 412-5230 (F) / (310) 412-5294 (B) / (310) 412-5881 (F)

Caltrans Response #6:

A6

A. Section 2.2.6 of the Draft IS/EA identifies temporary emissions impacts by CO, NOx, ROG, and PM10 from stationary or mobile powered on-site construction equipment including trucks and pavers. In addition, the Preferred Alternative, identified as the No-Build Alternative, will not result in construction or demolition activities; and therefore, will not result in impacts or changes to the emissions sources.

B. Amount of disturbed areas is no longer relevant as No-Build Alternative 1 has been identified as the Preferred Alternative. Construction duration had been identified in the Summary as to begin in Spring 2013, and end in Spring 2015.

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P. 03

A6

of earth, concrete or other materials be conducted? Also if the interchange creates an opportunity to add an additional lane this will affect air quality impacts for freeway motorists. The document should identify the amount of hectares that will be disturbed, the number of construction days and review these against CEQA guidelines issued by SCAQMD (South Coast Air Quality Management District).

The document indicates that it cannot determine the number of construction worker trips. Therefore, it should not make a generalized conclusion that impacts will not occur. The document should rely on CALTRANS protocol to determine a reasonable number of construction worker trips. Direct emissions of CO, NOX, ROG, SOX, and PM10 could exceed daily significance thresholds during construction. Impacts to sensitive receptors near construction areas would be inversely proportional to distance and would decrease with distance from the source. However, there is no way to determine if reasonable dispersion near residential areas would occur since dispersion modeling or analysis was not performed and also since there is no stated estimate of construction workers. The EA in effect applies less than a general regional air quality analysis to evaluate project-specific impacts. Further evaluation must be conducted of the project specific area in or near Inglewood.

Also, there could likely be some correlation between the Hollywood Park Redevelopment Project (2009) and project impacts to sensitive receptors during both construction and project operations. CALTRANS was given a copy of the Hollywood Park DEIR and asked to reflect this in their final analysis. That project should be designed and under construction during 2013-2020. Use of that project's diesel equipment /vehicles and Arbor Vitae should be considered.

The City previously requested that CALINE 3 or a similar dispersion model be used and CALTRANS responded that CALINE 3 has not been validated for use with pollutants such as mobile source air toxins (MSAT). (Also CALINE 4 has replaced CALINE 3). THE EA goes on to state "Dispersion models are appropriate for predicting maximum concentrations that can occur at some time at some location within a geographic area but cannot accurately predict exposure patterns at specific times at specific locations across an urban area to assess potential health risk." The document goes on to discuss research that is being conducted by the National Cooperative Highway Research Program but does not however, address the dispersion aspects of a dispersion model like CALINE4. Essentially, Caltrans determined that the project would not have a cumulative impact on air quality—although local air monitoring station data for 2005 and 2007 shows that ozone levels were exceeded for this location—two days in 2005 and one day in 2007. It is reasonably feasible that a Dispersion model OR similar model that measured maximum concentrations that could occur at some time in Inglewood could be modeled to address the issues of mobile source emissions—NOX and ROG. However, since traffic based NOX and ROGs are not examined in the document, the document should not have concluded that there would be no significant impact. Caltrans should disclose the amount of reactive organic gases

2

Caltrans Response #6 Continued:

A. The air quality analysis for the project has been prepared in accordance with the requirements under NEPA and CEQA as well as those by the Clean Air Acts, Transportation Conformity Regulations, and policies and guidance by the EPA, FHWA, and the Department as appropriate. A mobile source air toxics (MSAT) analysis has been prepared following the latest FHWA MSAT Interim Guidance; and a CO analysis based on the EPA-approved CO Protocol developed by the Institute of Transportation Studies at the University of California, Davis in cooperation with the Department. A PM analysis has been conducted based on the joint EPA/FHWA guidance released on March 10, 2006, titled 'Transportation Conformity Guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Non-attainment and Maintenance Areas.'

Based on the SCAQMD's training presentation available on-line (<http://www.aqmd.gov/ceqa/models/URB07training.ppt>), the use of URBEMIS 2007 is limited to land use projects and is not recommended for road widening or linear infrastructure projects. At least one of the alternatives in the Draft IS/EA proposes roadway widening and changes to access that would require roadway widening.

B. Construction related emissions from the proposed project are discussed in the Draft IS/EA sections 2.2.6, 2.4 and 3.2. Operational emissions are discussed in the Draft IS/EA sections 2.2.6 and 3.2. The Department evaluates significance of an impact on a project-by-project basis. Furthermore, the Draft IS/EA as well as the Department's Standard Specifications require construction contractors to comply with the South Coast Air Quality Management's Rule 403 and to implement its control measures as appropriate to minimize fugitive dust during construction/demolition/site preparation activities.

Amount of disturbed areas is no longer relevant as No-Build Alternative 1 has been identified as the Preferred Alternative. Construction duration had been identified in the Summary as to begin in Spring 2013, and end in Spring 2015.

C. Comment noted. Thank you for your comment.

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P. 04

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(ROG) and nitrogen oxides (NOX) that will result from project construction and operation to determine ozone impacts.

In conclusion, Caltrans must measure the project's ozone impacts based on empirical data that includes consideration of vehicle trips generated by the Hollywood Park project, not based on a general conformity discussion of the federal and local transportation conformity rule. Although the northbound off ramp at Arbor Vitae would provide congestion relief at the Century and Manchester 1-405 on/off ramps, the direct levels of vehicle traffic and MSAT occurring from added and diverted traffic vehicles was not "reasonably feasibly" considered in the document.

If CALTRANS cannot adequately capture cumulative traffic and air quality impacts that would affect Inglewood from introduction of a ½ interchange at Arbor Vitae in a mitigated negative declaration, then they should consider preparation of an EA/EIR that would gather local project information. An estimated number of the 22,520 daily trips anticipated to occur during Phases I and II of the Hollywood Park Project (30-35%) could be diverted from Century to the Arbor Vitae exchange, thereby providing an additional 6,756 to 7,882 trip ends using Arbor Vitae. Air quality and traffic impacts should be evaluated to determine level of service and impacts to the regional and local air quality and transportation plans.

Also, climate-protective legislation, including AB 32, which calls for the state to significantly reduce greenhouse gas emissions, needs to be contained in the document. There is some discussion of climate change strategies but these may not go far enough. The California Office of the Attorney General has established recommended measures for projects to mitigate greenhouse gas emissions. It is the position of the State Legislature (as expressed in its adoption of AB 32, The California Climate Solutions Act of 2006) that global climate change poses significant adverse effects to the environment of the State of California and the entire world. Specifically, the document should look at compliance with the following executive orders:

- 2010: Reduce greenhouse gas emissions to 2000 levels;
- 2020: Reduce greenhouse gas emissions to 1990 levels; and
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

Compliance with Executive Order 12898 (Environmental Justice) cannot occur until the air quality and traffic analysis are complete.

RECOMMENDATION: I recommend that the City request that the document reflect additional air quality, traffic and greenhouse gas emissions analysis that is based in part on the eventual construction and operation of the Hollywood Park project.

We are attaching a petition signed by Inglewood residents submitted by the office of Council Member Eloy Morales (District 3).

3

Caltrans Response #6 Continued:

A. The FHWA Interim MSAT Guidance provides for a tiered approach for analyzing MSAT, depending on specific project circumstances. For the types of projects that serve to improve operations of highway without adding substantial new capacity or without creating a facility that is likely to meaningfully increase MSAT emissions, the FHWA Guidance indicates that a qualitative analysis would need to be prepared as has been in the Draft IS/EA. The qualitative MSAT analysis indicates that emissions will likely be lower than present levels in the design year due in part to the EPA's and California's control programs that are projected to reduce MSAT emissions by at least 57 to 87 percent from 2000 to 2020.

B. Your suggestion to perform dispersion modeling and health risk for MSATs is acknowledged. However, dispersion modeling of MSAT emissions will not be included as part of the air quality analysis for this project. The MSAT analysis was prepared following the FHWA MSAT Interim Guidance which does not support the use of dispersion modeling to evaluate impacts from MSAT emissions. Furthermore, EPA has not established guidelines for quantitative dispersion modeling of MSATs and the Transportation Conformity Rule for PM₁₀/PM_{2.5} hotspot analyses states "The requirements for quantitative analysis contained in this paragraph (b) will not take effect until EPA releases modeling guidance on this subject and announces in the Federal Register that these requirements are in effect. [40 CFR 93.123(b)(4)]". EPA has also not released modeling guidelines for PM₁₀/PM_{2.5} hotspot analyses.

FHWA does not believe that dispersion modeling can provide a meaningful comparison of alternatives and, in fact, may provide misleading information as to the current understanding of MSATs and the capabilities of current tools. There are a number of reasons why, at this time, FHWA does not support dispersion modeling. As part of the development of the FHWA interim MSAT guidance, FHWA conducted a thorough review of the scientific information related to MSATs from transportation sources. As a result of that review, FHWA concluded that the available technical tools do not enable a reliable estimate of pollutant exposure concentrations or predict the project specific health impacts of the emissions changes associated with transportation project alternatives. EPA's Guidance on Air Quality Models includes the following conclusions on the accuracy and precision of air quality models: The models are reasonably reliable

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Thank you again for the opportunity to comment. If you have any questions, please contact Mindy Wilcox, Senior Planner at (310) 412-5230.

Sincerely,



Wanda Williams
Acting Planning and Building Director

CC: Tim Wanamaker, City Administrator
Sheldon Curry, Assistant City Administrator
Darryl Brown, Executive Assistant to the Mayor

Caltrans Response #6 Continued:

B. Cont. in estimating the magnitude of the highest concentrations occurring sometime, somewhere within an area-errors of 10-40 percent are typical. Estimates of concentrations that occur at a specific time and site are poorly correlated with actually observed concentrations and are much less reliable.

The MSAT analysis did not identify significant adverse effects on air quality, comparing no build to the build alternative, so mitigation measures for MSATs will not be included with the Final Environmental Document.

C. Air quality impacts during construction and operation have been evaluated in Section 2.2.6 based on the available traffic data.

The No Build Alternative 1 would not directly lead to any increases in GHG emissions and that the No-Build Alternative has been identified as the Preferred Alternative.

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P. 06

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Inglewood



California

Eloy Morales, Jr.
Councilman, District 3

February 2, 2010

To Whom It May Concern:

The purpose of this accompanying letter is to forward a petition delivered to my office by residents of Inglewood in opposition of Cal Tran's planned 405 fwy Arbor Vitae on/off ramp.

Thank you,

A handwritten signature in black ink, appearing to read "Eloy Morales, Jr.", written over a faint circular stamp.

Eloy Morales, Jr.
Council Member, District 3
City of Inglewood

One Manchester Blvd./P.O. Box 6500/Inglewood, California 90312/(310) 412-5320/Fax (310) 412-8788/www.cityofinglewood.org

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FAX NO.

P. 07

A6

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN AND THEN REBUILDING THE ARBOR VITAE STREET BRIDGE, ADDING TWO NEW RAMPS AND BUYING PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN, ALL AT AN ESTIMATED COST of \$87,000,000.

NAME	ADDRESS	ZIP CODE
1. Lucriste Lincome	1146 S. Truro	90301
2. Mine Rankin	1885 Truro	90301
3. Rosael Garcia	1009 Truro	90301
4. ALFONSO BRAZCO	1132 S. FLY AVE	90301
5. Kelly	1011 STRUPD AVE	90301
6. Pat Campbell	1023 S. TRURO AVE	90301
7. Laura T. Ortega	1033 S. Truro ave.	90301
8. Rosalee Zapp	227 W Hardy	90301
9. William Turner	252 W. Hardy St	90301
10. Javier Gonzalez	1117 S. TRURO AVE	90301
11. Robert Sandoz	1135 TRURO AVE	90301
12. Elena Mota	112A S. Truro Ave	90301
13. John	1179 S. Truro ave	90301

Caltrans Response #6 Continued:

A. Thank you for your comments. Caltrans has identified the No-Build Alternative as the Preferred Alternative.

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P. 08

A6

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
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ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
14. Salvador	1217 S TAURO AVE	90301
15. Eduardo	1232 S TAURO AVE	90301
16. Leonardo	1230 S TAURO AVE	90301
17. Oscar	1222 S TAURO AVE	90301
18. Josue	1218 S TAURO AVE	90301
19. De [Signature]	1206 S TAURO AVE	90301
20. Ada	1206 S TAURO AVE	90301
21. Phyllis	216 W 98TH ST	90301
22. Felix De Leon	1130 TAURO AVE	90301
23. Claudia Lopez	1142 TAURO AVE	90301
24. JoAnne Gonzalez	1127 S TAURO AVE	90301
25. Audrey Currey	1124 S TAURO AVE	90301
26. Rita Hand Solomon	1120 S TAURO AVE	90301

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FAX NO.

P. 09

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P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
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ALL AT AN ESTIMATED COST OF \$87,000,000.

NAME	ADDRESS	ZIP CODE
27. Victor Mardago	1036 STRURO AVE	90301
28. Teresa Marmolejo	1036 Struro Ave	90301
29. Maria Zuniga	1019-S Truro AVE	90301
30. Susan Allen	1014. S. TRURO AVE	90301
31. Narcisca Mercado	917 S. Oak St.	90301
32. Alfredo Andrade	706 Arbor Vitae St	90301
33. Elisa Castañeda	909 SASH AVE	90301
34. Irma Graciano-Ag	952 S. Ash Ave	90301
35. Jorge Aguirre	952 S ASH AVE	90301
36. MARIO CORDOVA	5034 9527	90301
37. Kristil	9510 Ocean Gate Ave.	90301
38. Veronica Sepulveda	9518 Ocean Gate Ave	90301
39. Melissa Arnold	9528 Ocean Gate Ave	90301

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P. 10

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P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
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ALL AT AN ESTIMATED COST OF \$7,000,000.

NAME	ADDRESS	ZIP CODE
40. Mike Lindquist	9536 Ocean Gate Ave	90301
41. Araceli Sanchez	1032 S. Truro Ave	90301
42. Elpidio Poyatoso	1032 Truro Av.	90301
43. Sandy Davini	933 Kenwood Street	90301
44. Jose Ruiz	949 Kenwood	90301
45. Joel Stgo	949 Kenwood	90301
46. Elvie Cuevas	5046 W. 95th St.	90301
47. Montee Benjamin	5044 W. 95th St.	90301
48. Eric Jones	5046 W. 95th Street	90301
49. Jorge Galano	5034 W. 95th St	90301
50. Cristina Perez	9511 Redfern Ave	90301
51. Maria L	5034 W. 95th St	90301
52. Carlos Jimenez	5034 W. 95th St	90301

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P. 11

A6

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
AND THEN REBUILDING THE ARBOR VITAE STREET
BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST OF \$7,000,000.

NAME	ADDRESS	ZIP CODE
53. Luis Castillo	9535 Redfern Ave	90301
54. Rosalba Calderon	9601 Redfern Ave	90301
55. Carlos Calderon	9604 Redfern Ave	90301
56. Summa Ramirez	9607 Redfern Ave	90301
57. MARCO GUTIERREZ	9617 REDFERN AV	70301
58. Rosada Garcia	9623 Redfern Ave	90301
59. TOM MAPLE	9807 REDFERNAVE	90301
60. Norma Munoz	9821 Pattern Ave	90301
61. Silvia Robles	9538 Redfern Ave	90301
62. Daisy Hurtado	9536 Redfern ave	90301
63. Allen Tujillo	5056 W 95th Iny. Ca	90301
64. Eric Reyes	9523 REDFERN AVE	INGLUWOOD CA. 90301
65. Nichelle Flores	980 KENNEDY ST.	90301

FEB-03-2010 WED 04:27 PM

FAX NO.

P. 12

A6

P E T I T I O N

I AM AGAINST CALTRANS TEARING DOWN
AND THEN REBUILDING THE ARBOR VITAE STREET
BRIDGE, ADDING TWO NEW RAMPS AND BUYING
PROPERTY'S IN THE NEIGHBORHOOD TO TEAR DOWN,
ALL AT AN ESTIMATED COST of \$7,000,000.

NAME	ADDRESS	ZIP CODE
66. Omar Delle	939 Kenwood Ave	90301
67. Alice Ferrell	944 Kenwood	90301
68. FERNANDO PEREZ	936 KENWOOD	90301
69. CRISTINA PEREZ	936 KENWOOD	90301
70. Dion Featherstone	930 Kenwood	90301
71. Roberto Rodriguez	928 Kenwood	90301
72. Andres Sanchez	658 Arborvitae St	90301
73. Be Dura	1429 S. Truro Ave	90301
74. Noel H. Flower	10299 TRURO AV	90301
75. Brittain Allen	1014 STURRO AV CA	90301
76. Kimberly Wonders	1023 Truro Ave CA	90301
77. Juan Lopez	1010 S. Truro Ave	90301
• PEDRO VALCENZUELA	1018 S TRURO AV	90301



Ron Kosinski/D07/Caltrans/CAGov
v
02/04/2010 09:38 AM

To Eduardo Aguilar/D07/Caltrans/CAGov@DOT
cc Aziz Elattar/D07/Caltrans/CAGov@DOT
bcc
Subject Fw: EPA Comment on I-405 Arbor Vitae Half Interchange Draft Environmental Assessment

F Y I (I will send them back a thanks)

— Forwarded by Ron Kosinski/D07/Caltrans/CAGov on 02/04/2010 09:34 AM —



Ganson.Chris@epamail.epa.gov
02/03/2010 06:00 PM

To Ron_Koalski@dot.ca.gov
cc Dunning.Conneli@epamail.epa.gov
Subject EPA Comment on I-405 Arbor Vitae Half Interchange Draft Environmental Assessment

Greetings Ron,

Please find attached a letter providing our comment on the I-405 Arbor Vitae Half Interchange Draft Environmental Assessment. A hard copy of this letter will follow via mail.

Also, I want to let you know that I am the new project lead for Caltrans District 7 project environmental review. I look forward to working with you into the future!

Regards,
Chris

Chris Ganson
Environmental Protection Specialist
Communities and Ecosystems Division | Environmental Review Office
US EPA Region 9 | 75 Hawthorne Street | San Francisco, CA 94105

ganson.chris@epa.gov | (415) 947-4121 2010_02_03_EPACommentsOnArbor405DraftEA.pdf



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION IX
 75 Hawthorne Street
 San Francisco, CA 94105-3901
 FEB 03 2010

Mr. Ronald Kosinski
 California Department of Transportation
 Division of Environmental Planning (405 Arbor Vitae Interchange)
 100 South Main Street MS 16A
 Los Angeles, California 90012

Subject: Draft Environmental Assessment for the Interstate 405 at Arbor Vitae Street, New South Half Interchange Project, Inglewood, California

Dear Mr. Kosinski:

The United States Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

We appreciate the early coordination opportunities provided to EPA by Caltrans District 7 through the environmental document development process for other projects within Caltrans District 7 and hope to continue to be available to further discuss our comments regarding this proposed Interchange project. Our enclosed comments identify concerns with: (1) the purpose and need for the project; (2) consideration of induced travel demand; (3) analysis of children's health impacts; and (4) analysis of greenhouse gas emissions. Enclosed comments detail these concerns and provide our recommendations for improvement.

We appreciate the opportunity to review this Draft EA. When the Final EA is released for public review, please send a copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 947-4161, or Chris Ganson, the lead reviewer for this project, at (415) 947-4121 or ganson.chris@epa.gov.

Sincerely,

Connell Dunning, Transportation Team Leader
 Environmental Review Office (CED-2)

Enclosure: EPA's Detailed Comments

cc: Roderick Diaz, Los Angeles County Metropolitan Transportation Authority
 Steve Smith, South Coast Air Quality Management District
 Gina Marie Lindsey, CEO, Los Angeles World Airports
 David Kessler, Federal Aviation Administration

Printed on Recycled Paper

Caltrans Response #7:

A. Air Quality analyses in the Draft IS/EA have been completed based on the available traffic data developed for the project alternatives, including the No-Build Alternative.

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR INTERSTATE 405 ARBOR VITAE HALF INTERCHANGE PROJECT, FEBRUARY 3, 2010

Purpose and Need

An environmental assessment shall include brief discussions of the need for the proposal (40 CFR Part 1508.9), and should not be so narrow as to restrict potential solutions that might meet the underlying need with fewer adverse impacts. The purpose and need statement for the Arbor Vitae Half Interchange Project should frame the problem broadly enough that the document can consider meaningful alternative solutions, but distinctly enough to make focused analysis possible. Restricting purpose and need to a single mode, as presented in the Draft EA precludes the consideration of alternatives to the project that may accomplish its underlying objectives with less negative impact on the human health and the natural environment.

Recommendations:

- Revise the Purpose and Need statement so that it does not restrict the range of potential solutions solely in terms of moving vehicles. For example, describe the underlying need to move people, rather than vehicles. Include a discussion of alternate means of supplying the region's residents with access to destinations and identify how those means are accommodated by the proposed project.

Transportation Demand Management

Transportation Demand Management (TDM) and Transportation Systems Management (TSM) are shorthand for a wide array of parking, pricing, traffic control, and other strategies that reduce and/or smooth motor vehicle travel, thereby delivering congestion relief and emissions reduction. TDM measures reduce VMT, and so reduce the disbenefits that come along with more vehicle travel, such as:

- Local and regional air pollution;
- Water pollution from additional roadway runoff from widened facilities;
- Traffic collision hazards
- Discouraging of active mode transportation (walking and cycling), and the impact of that on public health

As noted in the EA, TDM measures must be implemented over a larger area than an individual infrastructure project to produce the same congestion relief. However, the project area could be defined so as to render these solutions feasible, or TDM measures outside the project area could be considered.

Recommendations:

- Discuss opportunities to collaborate with regional agencies to create opportunities for TDM/TSM. Describe the potential of more broadly considered TDM/TSM measures to alleviate congestion on adjacent interchanges. Discuss the merits of these measures as alternative solutions to the project as proposed and identify if these measures can meet the needs as discussed above. Include this additional information in the Final EA.

Caltrans Response #7 Continued:

A. Air Quality analyses in the Draft IS/EA have been completed based on the available traffic data developed for the project alternatives, including the No-Build Alternative.

B. We do not believe that the projects' purpose and need statement is too restrictive. As the proposed project is a highway improvement project, a multi-modal alternative was not identified under any of the project alternatives previously studied.

C. TDM/TSM measures can be re-evaluated should the project move forward in the future. Implementation of TDM/TSM measures alone are not currently identified as meeting the project's need and purpose.

- Discuss in more detail the “many other projects and alternatives...in the works aimed at improving circulation in the project study area” (p. 28). As appropriate, include the cumulative impacts of the Arbor Vitae interchange and these projects in a Cumulative Impacts discussion.

Independent Utility, Logical Termini, and Connected Actions

As stated on page 3 of the Draft EA, a reason for previous delay for the proposed project was lack of support by Federal Highway Administration, indicating that FHWA would only approve an environmental document that included the entire interchange. Further, Page 11 states that “Funding for a full interchange project would not be available and thus the new south half interchange at Arbor Vitae Street was proposed.” Funding limitations should not be grounds for segmenting environmental analysis; however, we note that the document identifies community impacts anticipated from the full interchange alternatives provided support for the decision to propose the revised half-interchange.

Recommendations:

- Clarify if the proposed project as a half-interchange addresses the challenges identified by the community through the previous Environmental Assessment process. Confirm whether or not additional analysis to solve the transportation needs in the defined project area may occur at a later date if funding is identified.
- In the Final EA, elaborate on the basis for the termini selected for the project. If funding limitations are the basis for the termini chosen, justify why Caltrans did not pursue an option of developing an environmental document examining a greater scope of the identified need (i.e., including a larger portion of the roadway) with a construction “phasing” plan linked to funding.

The Draft EA notes that “The Arbor Vitae Street Overcrossing will be widened to accommodate the future widening of the roadway with the construction of the Arbor Vitae New South Half Interchange Project,” (p. 21). Under NEPA, projects which do not demonstrate independent utility must not be “segmented” in order to reduce the size of the impact. We also note that concern exists in the community over the project’s facilitation of airport expansion:

“As noted in the public comments received from the public circulation in 2000 of the Arbor Vitae Interchange Project Environmental Assessment/Initial Study approved in 2001, congestion from growth, particularly growth from the expansion of the Los Angeles International Airport (LAX) and its supporting businesses, is a concern to residents and workers. A number of past opponents of the project suspect that the purpose of the Arbor Vitae Interchange is to serve as an access point to Los Angeles International Airport and support its expansion. According to past and the current Environmental Assessment/Initial Studies of this interchange project, the project has not and will not include in its purpose to aid in the expansion of the airport’s facilities.” (p. 28)

Though past and present studies of the interchange project do not explicitly include this effect in their purpose, the project nevertheless potentially could facilitate airport expansion.

Recommendations:

- Analyze the segmentation of the interchange and roadway widening projects and provide a discussion of the results in the Final EA. If the two projects determined not

Caltrans Response #7 Continued:

- A. Rejected alternatives are already discussed in the environmental document.
- B. As the comment noted, the previously proposed full interchange project was rejected due to several reasons including its community/relocation and park land impacts. Funding is not the only reason. This paragraph has been revised.
- C. If funding was identified later, the Department would have the difficult task to persuade SCAG to reinstate the North Half Interchange project and we would have to work on a new Environmental Document which will address the impacts from the Section 4(f) document of the Full Interchange Project
- D. The proposed half interchange project has independent utility, and there is no current intention to construct a full interchange in the future. The statements in the environmental document have been revised to avoid any confusion.
- E. As responded above, it is not just funding but environmental/community impacts are the reason the previous full interchange project was rejected. The current half interchange project is proposed due to transportation need in the area.
- F. Thank you for your comment. No-Build Alternative 1 has been identified as the Preferred Alternative.

to have independent utility, and are therefore connected actions, include the roadway widening in the analysis of the interchange. Otherwise, discuss impacts of the roadway expansion within the cumulative impacts analysis.

- Analyze the potential of the project to induce growth in and around Los Angeles Airport and provide a discussion of this analysis in the Final EA.

Community and Regional Impacts of Induced Travel Demand

Relieving a bottleneck on a congested roadway or system will typically induce demand for use of that facility, generating more Vehicle Miles Traveled (VMT) (as reflected in the VMT model data presented in Table 34 (p. 57)). However, conflicting information regarding VMT is presented in the Draft EA, including titling of a section "Commuter Savings" which identifies that the VMT and Vehicle Hours Traveled (VHT) both grow relative to the No Build scenario. Further, absent TDM measures, it is not possible to reduce congestion to accommodate existing and projected future demand without also inducing new demand¹; the capacity created can be used equally by "planned" motorists and unplanned motorists.

Recommendations:

- Add a background discussion in the Final EA explaining the phenomenon of induced travel demand as it relates to this project. Include a discussion of the connection between induced travel demand and TDM measures and identify specific TDM measures that, if implemented, would reduce effects of induced travel demand.
- Include in the Final EA a discussion of cost-benefit analysis results in light of the regional increase in both VMT and VHT presented in Table 34. Include disbenefit from increased VMT/VHT regionally, including externalities such as greenhouse gas emissions. Revise the cost-benefits analysis conclusions if appropriate.
- Further investigate the means by which the project will relieve projected congestion without accommodating/encouraging new growth (land use or airport) and revise the document, if applicable, to include measures to reduce any adverse growth-related impacts associated with the project.
- Identify in the Final EA the potential of direct, indirect, and cumulative air and noise impacts to Environmental Justice communities resulting from the project's increases in congestion to travelers outside the project area. Specifically, if the benefits that result to travelers in the immediate project vicinity cause congestion increases outside the project area, the Final EA should identify mitigation measures to offset these impacts.

Public Health Impacts

Additional vehicle travel may result in near-roadway health impacts. Sensitive receptors including schools, hospitals, and residential facilities for the elderly may be affected by any changes in vehicle travel as a result of the proposed project. While relocation, construction and noise effects on schools are discussed, the Draft EA does not identify air quality and safety impacts to children and sensitive receptors.

¹ "Generated Traffic and Induced Travel Implications for Transport Planning". ITE Journal, Vol. 71, No. 4, Institute of Transportation Engineers (<http://www.vtpi.org/gentra.pdf>), April 2001, pp. 38-47.

Caltrans Response #7 Continued:

A. Thank you for your comments. Caltrans has identified the No-Build Alternative as the Preferred Alternative.

B. The July 10, 2008 Traffic Noise Study Report addresses the traffic noise impacts due to the proposed project per the Code of Federal Regulation (23CFR772) and Caltrans Noise Protocol. The environmental generalist identifies cumulative noise impacts per CEQA/NEPA during the project approval/environmental document phase.

<p>Recommendation:</p> <ul style="list-style-type: none"> • In the Final EA, add a discussion of local air quality, mobile source toxics impacts, and safety risks that will result from the changed travel patterns caused by the project. Identify potential mitigation, such as traffic calming measures. <p>Climate Change Greenhouse gas emissions (GHGs) are correlated with VMT. Additionally, the speed at which vehicle travel takes place, and the smoothness of travel vs. amount of “stop and go” traffic, has some influence over GHG emissions. GHGs are global pollutants; their effect does not depend on where they are emitted. The aggregate effect of the project on vehicle travel, inside and outside of the defined project area or sub-region, must be considered in order to analyze the project’s full GHG emissions impact.</p> <p>As described on p. 56 of the EA and in Table 34 (p. 57), when looking at the entire region, the project will generate an additional 13,128 VMT per day over the no-build scenario. While the smoothing of traffic local to the project area might act to reduce emissions there, VHT increases 32,776 over the region as a whole, suggesting that congestion reduction in the project vicinity is more than made up for by increase in congestion—causing slower speeds—elsewhere. (This is the result expected from a VMT increase in a congested region.)</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • Include in the Final EA a quantitative analysis of the project’s full implications for GHG emissions regionally using best available data and analysis methods. Incorporate results into the Final EA. • Use the results of the quantitative analysis to revise discussion on pp. 144-145 regarding the effects the project will have on GHG emissions and identify additional mitigation measures and changes to the project alternative to reduce GHG emissions. 	<p style="text-align: right;">A7</p> <p>Caltrans Response #7 Continued:</p> <p>A. The Draft IS/EA provides local air quality analyses for various pollutants including CO, PM₁₀, PM_{2.5}, and MSAT. Furthermore, the Preferred Alternative, identified as the No-Build Alternative, will not result in any changes to travel patterns; and therefore, will not result in any changes to impacts to sensitive receptors.</p> <p>Travel pattern changes due to the proposed project is not expected to have any significant negative impacts on air quality, mobile source toxics impacts, and safety risks that would require mitigation.</p>
---	---

Inglewood



California

PUBLIC WORKS DEPARTMENT

Glen W. C. Kau, P.E.
Public Works Director/City Engineer

February 3, 2010

Ronald Kosinski
Deputy District Director
Caltrans
Division of Environmental Planning
100 S. Main Street, MS16A
Los Angeles, CA 90012

Re: 405 Arbor Vitae Interchange - Draft EA-IS comments

Dear Mr. Kosinski,

The City of Inglewood Public Works Department (City) is providing comments regarding the subject. They are as follows:

- The City has interest in the proposed project as the transportation infrastructure improvements will interface with existing city infrastructure and land use.
- Comments for the preliminary of the draft EA/IS document were provided to Caltrans by staff of the City's Planning & Building Department and the Public Works Department.
- The potential right-of-way take (Figure 2-06) at the southeast corner of Arbor Vitae Street with Ash Street involves a City-owned property. A Metro-funded project for the use of that property as a parking lot is currently under design by the City. Construction is scheduled to complete by May 2010.
- A stated purpose of the project is the reduction of traffic congestion at the Century Boulevard and Manchester Boulevard interchanges with I-405. These interchanges are within the City of Inglewood.
- The City of Inglewood General Plan-Circulation Element (adopted December 15, 1992) shows a functional classification of Arbor Vitae Street as a major arterial from Prairie Avenue to the west city limit near Aviation Boulevard and freeway access at Interstate 405.
- The project will improve access to Interstate 405 for City of Inglewood residents and business owners.

Sincerely,

Glen W. C. Kau, P.E.
Public Works Director

One Manchester Boulevard / P.O. Box 6500 / Inglewood, CA 90312 / (310) 412-5333 / www.cityofinglewood.org

Caltrans Response #8:

A. Thank you for your comments. As discussed in the Final Environmental Document, result of the new analysis shows that although the proposed half interchange would reduce congestions at nearby interchanges including Manchester Avenue and Century Boulevard and Manchester Avenue and Sepulveda Boulevard but it would also result in substantial delays along Arbor Vitae Boulevard. Due to this impact and the funding issue as well as strong community preference, the No-Build Alternative has been identified as the Preferred Alternative for this project.



ARNDT SCHWARZENEGGER
GOVERNOR

February 4, 2010

Eduardo Aguilar
Department of Transportation, District 7
100 South Main Street MS-16A
Los Angeles, CA 90012-3606

Subject: Interstate 405 at Arbor Vitae Street New South Half Interchange Project
SCH#: 2000061039

Dear Eduardo Aguilar:

The State Clearinghouse submitted the above named Other Document to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 3, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov



COTYLLA BRYANT
DIRECTOR

Caltrans Response #9:

A. The comments have been responded to with answers supported by specific documentation.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2000061039
Project Title Interstate 405 at Arbor Vitae Street New South Half Interchange Project
Lead Agency Caltrans #7

Type Oth Other Document
Description The California Department of Transportation (Caltrans) has prepared a Draft Initial Study / Environmental Assessment (IS / EA) and Section 4(f) evaluation for construction of a proposed Interchange on Interstate 405 (I-405) at Arbor Vitae Street in the City of Inglewood, Los Angeles County. The project limits extend roughly from Century Boulevard to Manchester Boulevard in the City of Inglewood. The proposed interchange would include constructing two (2) on and two (2) off ramps on the east side of I-405 at Arbor Vitae Street. This proposed project involves additional right-of-way.

Lead Agency Contact
Name Eduardo Aguilar
Agency Department of Transportation, District 7
Phone (213) 897-8492 **Fax**
email
Address 100 South Main Street MS-16A
City Los Angeles **State** CA **Zip** 90012-3606

Project Location
County Los Angeles
City Inglewood, Los Angeles, City of
Region
Lat / Long 33° 57' 9.67" N / 118° 22' 9.25" W
Cross Streets Interstate of 405 @ Arbor Vitae Street
Parcel No. 4023-002-037
Township **Range** **Section** **Base**

Proximity to:
Highways 405
Airports LAX
Railways
Waterways
Schools Oak Street Elementary School
Land Use Residential Area

Project Issues Archaeologic-Historic; Economics/Jobe; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Schools/Universities; Toxic/Hazardous; Traffic/Circulation; Landuse; Aesthetic/Visual; Air Quality; Biological Resources; Cumulative Effects; Growth Inducing; Soil Erosion/Compaction/Grading; Vegetation; Water Quality

Reviewing Agencies Resources Agency; Department of Fish and Game, 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

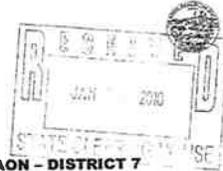
Date Received 12/30/2009 **Start of Review** 12/30/2009 **End of Review** 02/03/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA
 NATIVE AMERICAN HERITAGE COMMISSION
 815 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6221
 Fax: (916) 657-6390
 Web Site: www.nahc.ca.gov
 e-mail: ca_nahc@pacbell.net

Arnold Schwarzenegger, Governor

January 4, 2010



Mr. Eduardo Aguilar
CALIFORNIA DEPARTMENT OF TRANSPORTATION - DISTRICT 7
 100 South Main Street - MS 16A
 Los Angeles, CA 90012

Re: SCH#2000061039 CEQA Notice of Completion: Initial Study for the Interstate 405 at Arbor Vista Street- New South Half Interchange Project, located in the City of Inglewood, Los Angeles County, California

Dear Mr. Aguilar:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson (1985) 170 Cal App. 3d 604*) The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. The NAHC is a 'Participating Agency' with Caltrans. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within one-half mile of the APE. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11..

Consultation with tribes and interested Native American tribes and individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 (f) et seq), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 et seq) and NAGPRA (25 U.S.C. 3001-3013), as appropriate.

Caltrans Response #9 Continued:

A. Comment noted.

B. This project has completed compliance with the Department of Transportation Act of 1966 and the National Historic Preservation Act of 1966, specifically Section 106.

C. As such, consultation with the Native American Heritage Commission was previously carried out (including a search of the Sacred Lands file).

Caltrans Response #9 Continued:

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior' discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

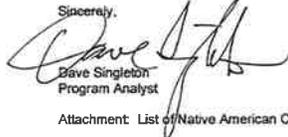
CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave sites.

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

C. Also consultation was carried out with interested Native American community members as part of the compliance effort. The result was that no cultural resources were identified in the Area of Potential Effect either from surveys, information reviews, or consultations.



**South Coast
Air Quality Management District**

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

EMAILED: February 12, 2010

February 12, 2010

Mr. Ronald Kosinski *RK*
Ron_Kosinski@dot.ca.gov
California Department of Transportation, Deputy District Director
Department of Environmental Planning (405 Arbor Vitae Interchange)
100 South Main Street MS 16A
Los Angeles, CA 90012

Review of the Draft Environmental Assessment/Initial Study (Draft EA/IS-MND)
for the Half Interchange (on-ramp) to the I-405 from Arbor Vitae Street

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document (including an extended review period). The following comments are meant as guidance for the lead agency and should be incorporated into either a Revised Draft or Final Environmental Assessment (Revised Draft or Final EA) as appropriate.

The air quality analysis presented in the Draft EA/IS-MND is inadequate. The lead agency failed to quantify criteria pollutant emissions during construction and operation, air toxics during operation, and greenhouse gas emissions. Without quantifying air quality impacts from the project, the lead agency is unable to support its conclusions. As an example, the project includes a substantial amount of construction activities for the build alternatives, and the Draft EA/IS-MND identifies dust from construction as an impact, however a determination of no impact is made for all air quality considerations without a quantified analysis. Therefore a fair argument could be made that the lead agency failed to present substantial evidence (consistent with CEQA Guidelines §15064) supported by facts that no air quality impacts are presented by this project. SCAQMD staff is concerned that by unnecessarily avoiding quantification of potential air quality impacts using readily available tools, the lead agency may be acting contrary to the intent of CEQA to disclose to the public potentially significant impacts of a project.

Beginning on page 104, the lead agency presents several arguments stating that an analysis of MSAT emissions is not possible due to "technical shortcomings or uncertain science". Specifically, the following steps were found to present particular challenges to the lead agency; emissions modeling, dispersion modeling, exposure modeling, and health impacts based on exposure. The detailed comments on the following pages provide the technical resources and rationale for conducting each of the aforementioned standard modeling approaches. Further, when determining the need to conduct

Caltrans Response #10:

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A. Comments noted. Thank you for your comments.

<p>Mr. Kosinski 3 February 12, 2010</p> <p>1. The lead agency did not quantify potentially significant adverse regional construction or operational air quality impacts from the proposed project. In lieu of conducting a quantitative analysis for construction related air quality impacts, the lead agency states that the project is not significant because of the short term nature of the construction emissions, the state-mandated control devices on the project's construction vehicles and equipment, compliance with SCAQMD Rule 402 and Rule 403, consistency with the State Implementation Plan and the AQMP, and the insignificance of additional construction worker trips. This analysis appears woefully inadequate given the likely need for heavy construction equipment on a project of this size. It is common that equipment of this size will present significant impacts during construction activities, especially given the close proximity of nearby residences.</p> <p>With respect to operational emissions the lead agency qualitatively states that the project does not present air quality concerns because the project is not expected to have a significant number of diesel vehicles, and because the project would not result in any increase in the number of diesel trucks that would utilize the project. However, determining consistency and compliance with local and state programs is only one of many measures needed to assess construction-related air quality impacts. Qualitative analyses are insufficient for analyzing regional operational air quality impacts given the availability of specific guidance to assess these impacts (see below). To adequately evaluate air quality impacts, it is necessary to quantify both construction and operational emissions and compare them to applicable significance thresholds. Since the lead agency failed to quantify construction and operational related air quality impacts they have not demonstrated that air quality impacts from the proposed project are less than significant.</p> <p>SCAQMD staff requests that the lead agency identify all potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project in a Revised Draft EA or Final EA. Specifically, SCAQMD staff recommends the lead agency calculate air quality impacts from both construction (including demolition, if any) and operations where project-specific vehicular traffic is expected to increase. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings used for striping traffic lanes or any associated structures, off-road equipment and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.</p> <p>The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the lead agency use this Handbook as guidance when preparing its revised draft or final air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services</p>	<p style="text-align: right;">A10</p> <p>Caltrans Response #10 Continued:</p> <p>A. Section 2.2.6 of the Draft IS/EA identifies temporary emissions impacts by CO, NOx, ROG, and PM10 from stationary or mobile powered on-site construction equipment including trucks and pavers. In addition, the Preferred Alternative, identified as the No-Build Alternative, will not result in construction or demolition activities; and therefore, will not result in impacts or changes to the emissions sources.</p> <p>B. The air quality analysis for the project has been prepared in accordance with the requirements under NEPA and CEQA as well as those by the Clean Air Acts, Transportation Conformity Regulations, and policies and guidance by the EPA, FHWA, and the Department as appropriate. A mobile source air toxics (MSAT) analysis has been prepared following the latest FHWA MSAT Interim Guidance; and a CO analysis based on the EPA-approved CO Protocol developed by the Institute of Transportation Studies at the University of California, Davis in cooperation with the Department. A PM analysis has been conducted based on the joint EPA/FHWA guidance released on March 10, 2006, titled 'Transportation Conformity Guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Non-attainment and Maintenance Areas.'</p> <p>Based on the SCAQMD's training presentation available on-line (http://www.aqmd.gov/ceqa/models/URB07training.ppt), the use of URBEMIS 2007 is limited to land use projects and is not recommended for road widening or linear infrastructure projects. At least one of the alternatives in the Draft IS/EA proposes roadway widening and changes to access that would require roadway widening.</p>
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Department by calling (909) 396-3720. Additionally, the lead agency may be able to use the URBEMIS 2007 Model. Information regarding this model is available on the SCAQMD website at: www.aqmd.gov/ceqa/models.htm.

2. As part of the analysis recommended in comment #1 above, SCAQMD staff also recommends quantitatively analyzing PM_{2.5} emissions. The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. These thresholds have been developed specifically for the air basin in which the project is located. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.htm.
3. In addition to analyzing regional air quality impacts (see comments #1 and #2) the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. The lead agency qualitatively analyzed the project's localized impacts concluding that because the redistribution of traffic is minor and would occur near residential and commercial areas that have little truck traffic and only a marginal effect on truck movements the project will not result in an adverse local PM_{2.5} or PM₁₀ impact. This qualitative analysis completed by the lead agency is insufficient for evaluating localized air quality impacts, therefore, the SCAQMD staff requests that the lead agency quantify localized impacts by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.
4. In addition to the above recommended models, alternative guidance on a project's operational emissions (utilizing EMFAC2007) is available including: "Estimating Mobile Source Air Toxics Emissions: A Step-by-Step Project Analysis Methodology", 2006. UC Davis-Caltrans Air Quality Project Task Order No. 61. This guidance, prepared specifically for and with the lead agency, provides a method for developing credible emissions estimates for a project's operations.

Health Risk Assessment

5. On pages 105 and 106 of the Draft EA/IS-MND the lead agency indicates that because of the shortcomings in current techniques for exposure assessment and risk analysis Caltrans cannot reach any meaningful conclusions about project specific health impacts. As Caltrans is aware, CARB identified PM from diesel-fueled engines as a toxic air contaminant (TAC) in 1998, following an exhaustive 10-year scientific assessment process. In addition, as part of the identification process, the Office of Environmental Health Hazard Assessment (OEHHHA) evaluated the potential for

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Caltrans Response #10 Continued:

A. The air quality analysis for the project has been prepared in accordance with the requirements under NEPA and CEQA as well as those by the Clean Air Acts, Transportation Conformity Regulations, and policies and guidance by the EPA, FHWA, and the Department as appropriate. A mobile source air toxics (MSAT) analysis has been prepared following the latest FHWA MSAT Interim Guidance; and a CO analysis based on the EPA-approved CO Protocol developed by the Institute of Transportation Studies at the University of California, Davis in cooperation with the Department. A PM analysis has been conducted based on the joint EPA/FHWA guidance released on March 10, 2006, titled 'Transportation Conformity Guidance for Qualitative Hot-spot Analysis in PM_{2.5} and PM₁₀ Non-attainment and Maintenance Areas.'

Based on the SCAQMD's training presentation available on-line (<http://www.aqmd.gov/ceqa/models/URB07training.ppt>), the use of URBEMIS 2007 is limited to land use projects and is not recommended for road widening or linear infrastructure projects. At least one of the alternatives in the Draft IS/EA proposes roadway widening and changes to access that would require roadway widening.

B. Construction related emissions from the proposed project are discussed in the Draft IS/EA sections 2.2.6, 2.4 and 3.2. Operational emissions are discussed in the Draft IS/EA sections 2.2.6 and 3.2. The Department evaluates significance of an impact on a project-by-project basis. Furthermore, the Draft IS/EA as well as the Department's Standard Specifications require construction contractors to comply with the South Coast Air Quality Management's Rule 403 and to implement its control measures as appropriate to minimize fugitive dust during construction/demolition/site preparation activities.

C. The FHWA Interim MSAT Guidance provides for a tiered approach for analyzing MSAT, depending on specific project circumstances. For the types of projects that serve to improve operations of highway without adding substantial new capacity or without creating a facility that is likely to meaningfully increase MSAT emissions, the FHWA Guidance indicates that a qualitative analysis would need to be prepared as has been in the Draft IS/EA. The qualitative MSAT analysis indicates that emissions will likely be lower than present levels in the design year due in part to the EPA's and California's control programs that are

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diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma.

There are a number of studies that show a correlation of adverse health impacts of diesel PM and proximity to roadways. CAR¹⁴ recommends avoiding development of urban roads with 100,000 vehicles/day that are within 500 feet of sensitive land uses due to increased cancer risk from diesel PM¹. In order to be compliant with CEQA, substantial evidence (supported by facts) of potential health impacts caused by the project must be presented in the Draft EA/IS-MND.

The proposed half interchange will likely result in mobile source emissions occurring closer to sensitive receptors along the affected freeway segment, therefore, SCAQMD staff urges the lead agency to perform a mobile source health risk assessment (HRA) that includes air dispersion modeling, quantified health risk, and a significance determination in the Revised Draft EA or Final EA based on implementation of the proposed project. There are several guidance documents available for air dispersion modeling and HRAs. Below is a discussion to assist the lead agency in developing a HRA for the proposed project.

HRA Guidance

Quantitative health risk assessment guidance may not be readily at the federal level (as stated by the lead agency) however guidance is readily available from other lead agencies in the project area. For example, the SCAQMD has prepared the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis². Also, both Ports of Los Angeles and Long Beach have SCAQMD approved HRA protocols³, ARB has air dispersion guidance in Appendix 7 of the Diesel Risk Reduction Plan⁴, and HARP is available from CARB.⁵

If the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis is used, the health risk estimates should be completed according to OEHHA's cancer potency methodology. The SCAQMD's recommended threshold for cancer risk should not exceed 10 in one million at any receptor location, when compared to the pre-project risk.

Dispersion Modeling

¹ California Air Resources Board, April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at <http://www.arb.ca.gov/rl/landuse.htm>

² Available here: http://www.sqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.htm

³ For example: <http://www.polb.com/civica/filebank/blobdownload.asp?BlobID=5141>

⁴ Available here: <http://www.arb.ca.gov/diesel/documents/crrpapp.htm>

⁵ Available here: <http://www.arb.ca.gov/toxics/harp/harp.htm>

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Caltrans Response #10 Continued:

C. cont. projected to reduce MSAT emissions by at least 57 to 87 percent from 2000 to 2020.

A. Your suggestion to perform dispersion modeling and health risk for MSATs is acknowledged. However, dispersion modeling of MSAT emissions will not be included as part of the air quality analysis for this project. The MSAT analysis was prepared following the FHWA MSAT Interim Guidance which does not support the use of dispersion modeling to evaluate impacts from MSAT emissions. Furthermore, EPA has not established guidelines for quantitative dispersion modeling of MSATs and the Transportation Conformity Rule for PM₁₀/PM_{2.5} hotspot analyses states "The requirements for quantitative analysis contained in this paragraph (b) will not take effect until EPA releases modeling guidance on this subject and announces in the Federal Register that these requirements are in effect. [40 CFR 93.123(b)(4)]". EPA has also not released modeling guidelines for PM₁₀/PM_{2.5} hotspot analyses.

FHWA does not believe that dispersion modeling can provide a meaningful comparison of alternatives and, in fact, may provide misleading information as to the current understanding of MSATs and the capabilities of current tools. There are a number of reasons why, at this time, FHWA does not support dispersion modeling. As part of the development of the FHWA interim MSAT guidance, FHWA conducted a thorough review of the scientific information related to MSATs from transportation sources. As a result of that review, FHWA concluded that the available technical tools do not enable a reliable estimate of pollutant exposure concentrations or predict the project specific health impacts of the emissions changes associated with transportation project alternatives. EPA's Guidance on Air Quality Models includes the following conclusions on the accuracy and precision of air quality models: The models are reasonably reliable in estimating the magnitude of the highest concentrations occurring sometime, somewhere within an area, errors of 10-40 percent are typical. Estimates of concentrations that occur at a specific time and site are poorly correlated with actually observed concentrations and are much less reliable.

The MSAT analysis did not identify significant adverse effects on air quality, comparing no build to the build alternative, so mitigation measures for MSATs will not be included with the Final Environmental Document.

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CALINE3 and CAL3QHCR are the current EPA regulatory models for estimating maximum CO concentrations at roadways. As stated on page 105 of the Draft EA/IS-MND, these models are generally most appropriate for determining compliance with NAAQS, particularly for short term criteria (e.g., 1-hr or 8-hr) such as that required for CO. However, carcinogenic risk is estimated based on annual average concentrations over 70 years for residential and sensitive receptors and 40 years for worker receptors. Chronic non-carcinogenic risk is also estimated based on annual average concentrations. Additional regulatory models are available for these longer averaging times, including AERMOD and ISCST3⁶.

AERMOD and ISCST3 can be used to estimate carcinogenic health risk for both roadway and non-roadway sources. AERMOD is the current EPA approved model for general air dispersion modeling. For CEQA modeling, SCAQMD staff recommends use of any of these models (AERMOD, ISCST3, or CAL3QHCR) or HARP, which uses ISCST3.

6. On page 144 of the Draft EA/IS-MND the lead agency states that it is unable to provide a regulatory and/or scientific-based conclusion to determine if the project's contribution to climate change is cumulatively significant, because it is not currently possible to model and gauge the project-level impacts associated with an increase in greenhouse gas (GHG) emissions. SCAQMD staff strongly disagrees with this statement given that the Office of Planning and Research in its Technical Advisory (2008) specifically recommends analyzing climate change impacts from a project and making a determination of significance. Also, the California Attorney General's Office has entered into a number of lawsuits and settlements with lead agencies because they failed to analyze greenhouse gas emissions, failed to make a determination of significance (absence of a significance threshold does not relieve the lead agency of the obligation to make a significance determination) and/or failed to provide sufficient greenhouse gas mitigation measures. Therefore, SCAQMD staff requests that the lead agency revise the Draft EA or include in the Final EA a quantitative analysis of greenhouse gases, a determination of significance, and, if necessary, feasible mitigation measures.

Mitigation Measures

7. In the event that the lead agency's Revised Draft EA or Final EA requested in comment #1 demonstrates that any criteria pollutant emissions from the regional and/or localized construction emissions analysis create significant adverse impacts the SCAQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the SCAQMD's CEQA webpage at the following internet address: www.sqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

⁶ Available here: http://www.epa.gov/scram001/dispersion_prefreq.htm

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Caltrans Response #10 Continued:

B. cont. The CARB's Air Quality and Land Use Handbook actually makes a recommendation for avoiding developments of new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day; but not of urban roads. In addition, The No-Build Alternative has been identified as the Preferred Alternative and will not result in any impacts.

A. A CO analysis was performed based on the EPA-approved CO Protocol developed by the Institute of Transportation Studies at the University of California, Davis. The CO Protocol indicates that the procedures and guidelines comply with the following regulations without imposing additional requirements: Section 176(c) of the 1990 Clean Air Act Amendments, federal conformity rules, state and local adoptions of the federal conformity rules, NEPA, and CEQA requirements [Cal. Code Regs., tit.21, § 1509.3(25)]. Section 2.2.6 of the Draft IS/EA provides the CO analysis in accordance with the CO Protocol.

B. Your suggestion to perform dispersion modeling and health risk for MSATs is acknowledged. However, dispersion modeling of MSAT emissions will not be included as part of the air quality analysis for this project. The MSAT analysis was prepared following the FHWA MSAT Interim Guidance which does not support the use of dispersion modeling to evaluate impacts from MSAT emissions. Furthermore, EPA has not established guidelines for quantitative dispersion modeling of MSATs and the Transportation Conformity Rule for PM₁₀/PM_{2.5} hotspot analyses states "The requirements for quantitative analysis contained in this paragraph (b) will not take effect until EPA releases modeling guidance on this subject and announces in the Federal Register that these requirements are in effect. [40 CFR 93.123(b)(4)]". EPA has also not released modeling guidelines for PM₁₀/PM_{2.5} hotspot analyses.

FHWA does not believe that dispersion modeling can provide a meaningful comparison of alternatives and, in fact, may provide misleading information as to the current understanding of MSATs and the capabilities of current tools. There are a number of reasons why, at this time, FHWA does not support dispersion modeling. As part of the development of the FHWA interim MSAT guidance, FHWA conducted a thorough review of the scientific information

	<p style="text-align: right;">A10</p> <p>Caltrans Response #10 Continued:</p> <p>D. from two pages previous Conformity Guidance for Qualitative Hot-spot Analysis in PM2.5 and PM10 Non-attainment and Maintenance Areas.’</p> <p>Based on the SCAQMD’s training presentation available on-line (http://www.aqmd.gov/ceqa/models/URB07training.ppt), the use of URBEMIS 2007 is limited to land use projects and is not recommended for road widening or linear infrastructure projects. At least one of the alternatives in the Draft IS/EA proposes roadway widening and changes to access that would require roadway widening.</p> <p>A. from previous page It is acknowledged that the construction of the build alternative would result in temporary air quality impacts; and therefore, contractors will be required to implement appropriate measures according to SCAQMD Rule 403 during construction.</p> <p>As stated above, please note that the No-Build Alternative has been identified as the Preferred Alternative and there is no air quality impact associated with the No-Build Alternative.</p>
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JANE AND MARCUS A DEEMER

17136 Courtney Lane
 Huntington Beach, Ca. 92649
 Telephone 714 840-8569

January 12, 2010

Mr. Ron Kosinski
 Deputy District Director, Caltrans
 Division of Environmental Planning (Arbor Vitae)
 100 South Main Street MS16A
 Los Angeles, CA 90012

We are writing to protest the construction of the I-405 Improvements at Arbor Vitae Street in Inglewood.

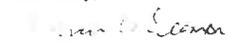
There are now two southbound on-ramps between Manchester and Century Boulevards and a third just South of Century. With the construction of the proposed Arbor Vitae on-ramp there will be 4 southbound on-ramps within approximately one mile. This added on-ramp will not alleviate congestion on the freeway in this area and we are concerned as to how traffic will merge onto the freeway with 3 on-ramps already in existence in this short distance. This added on-ramp may in fact cause more accidents as people merge into traffic.

The Century Boulevard northbound off-ramp is large, 3 lanes, and seems very adequate for access to Century Boulevard. We have never found this off-ramp to be congested.

We use both the Century southbound and northbound ramps and have never found them to be overcrowded and cannot justify the need for these additional ramps. Residents of this area will suffer from this project, increased traffic on Arbor Vitae, more difficult to get to our homes and additional noise and air pollution.

We urge you to reconsider the need for these ramps.

Sincerely,


 Marcus A. Deemer


 Jane Deemer

Property Owner: 639 Magnolia
 Inglewood, Ca 90301

Caltrans Response #11:

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A. Comments noted. Thank you for your comments and support of the Build Alternative. Although the build alternative would reduce congestion at Manchester Avenue and Airport Boulevard and Manchester Avenue and Sepulveda Boulevard Intersections but it also create substantial delays at intersections along the Arbor Vitae Boulevard Corridor. This and the fact that FHWA would not grant design exception for a Half Interchange. These events led to Caltrans identifying the No-Build Alternative as the Preferred Alternative in the Final Environmental Document.

B. The proposed southbound on-ramp will result in an additional merge on the southbound Interstate 405 freeway. Due to congestion on the mainline freeway, the Interstate 405/Interstate 105 weave following the proposed on-ramp is not expected to worsen significantly. Should the project move forward in the future, a safety analysis will be conducted to evaluate ramp operations.

C. All traffic noise impacts have been identified in the traffic noise study report and feasible and reasonable traffic noise abatement has been recommended for the build alternative in the form of two soundwalls totaling approximately 3259 feet in length and providing effective traffic noise reduction for 104 residences.

D. The updated traffic analysis for the proposed build alternative demonstrated that traffic would increase on Arbor Vitae Street.

E. Comment noted. Thank you for your comment.

F. Impacts to air quality have been evaluated for each alternative in Section 2.2.6 of the EA. The Preferred Alternative, the No-Build Alternative, will not result in impacts to traffic or cargo activity as there will not be any changes to the current geometrics.



"Walker, Daniel" <daniel.walker2@boeing.com>
 To: "eduardo_aguilar@dot.ca.gov" <eduardo_aguilar@dot.ca.gov>
 > cc
 01/21/2010 07:18 PM bcc
 Subject: Interstate 405 / Arbor Vitae Project EA/IS comments

Dear Mr. Aguilar,

Recommendation:
 After reviewing the Interstate 405 / Arbor Vitae Project Draft EA/IS, we support Caltrans building the two southside on/off ramps proposed because it will reduce traffic congestion in our neighborhood and therefore improve air quality and reduce vehicle fuel consumption.

Comments:
 The additional sound walls proposed on both sides of 405 should actually reduce noise environmental impacts of the freeway traffic on local neighbors. New proposed Ash Ave. Cul-de-sac should improve traffic on Arbor Vitae just south of 405 and reduce cut through vehicle traffic on Ash. The combination of the cul-de-sac and new sound wall should make Ash a more pleasant street for local Inglewood families to live on. Other environmental impacts such as visual / aesthetics / vibration, etc. all seem fairly minor, even for the closest neighbors living / working near 405 and Arbor Vitae. Impacts should be positive for the thousands of daily 405 freeway and local commuters. This project does not expand LAX.

Questions:

1. Please confirm that none of the other 405 on or off-ramps will be removed (i.e. Manchester, Olive St., La Cienega, Century Blvd.) permanently or closed temporarily during construction.
2. Please confirm that the new SB on-ramp from Arbor Vitae will have access to both 405 S and 105 Freeway (unlike Century Blvd. SB on-ramp).
3. Please confirm that this project will not negatively affect plans for / access to new planned MTA Green Line / Crenshaw Light Rail train stations at/near Aviation and Century Blvd., Aviation / Arbor Vitae, and/or Aviation / Manchester Blvd.
4. Please confirm that 6 ft wider on both sides Arbor Vitae bridge will be wide enough for bike lane and pedestrian traffic both east and west bound on Arbor Vitae.
5. Will there still be bike/pedestrian access to Ash Ave. from Arbor Vitae after Cul-de-sac is built?
6. Verify that sound wall on Ash will have appropriate landscaping not just brick.
7. How long do you estimate construction will last for entire project (2 years)?
8. To reduce impact on local community, can Caltrans use duration of construction time as a factor during bidding process?
9. Can Caltrans offer contract bonuses based on completing construction early or on-time (or penalize for being late)?
10. How will Caltrans minimize impact on 405 on/off ramps and local streets during construction?
11. Will road closure construction be limited to non-rush hour times only?
12. What are potential funding sources for the estimated \$87 million to build these new on/off ramps and sound walls, etc.
13. Do Caltrans traffic models used for this project assume a constant number of total trips will be made by commuters on 405 and local streets to compare build vs. no-build alternatives? Or do the models assume that freeway and

Caltrans Response #12:

- A. As originally proposed, none of the other ramps will be removed permanently or closed temporarily during construction.
- B. Yes, the southbound Onramp from Arbor Vitae Street would have access to Interstate 405 and Interstate 105.
- C. Yes, as proposed, the project would not have a negative impact on the planned MTA light rail lines.
- D. No, the widened Arbor Vitae Street Overcrossing would not accommodate bike lanes.
- E. Bike/pedestrian access to Ash Avenue to Arbor Vitae Street would have remained after the proposed cul-de-sac would have been built. Yes, there will still be bike/pedestrian access between Ash Avenue and Arbor Vitae Street.
- F. Caltrans utilizes context sensitive solutions for its landscaping and Best Management Practices (BMP) for construction and maintenance. Yes, landscaping features will be incorporated into the proposed soundwalls.
- G. The proposed but rejected project would have taken at least 2 years to construct, from Spring (April) 2013 to Spring (March) 2015. Construction could have lasted up to 3 years.
- H. Confirmed - Each contract has a specified scope, cost and duration which is the basis for contractors to bid.
- I. Confirmed - Caltrans offers contract bonuses (incentive/disincentive clause) based on completing construction early or on-time or penalizes contractors for being late by assessing an extra penalty for liquidated damages.
- J. Caltrans would have constructed the proposed but rejected build alternative with BMPs. Stage construction would have been implemented to reduce impacts to ramps and local streets.
- K. Caltrans would have used Best Management Practices to avoid closure of construction during rush-hour times when it is feasible to do so and finish the construction of the project on time. Closures will be limited to certain non-rush-hour times.

<p>road improvements may induce new additional commuters (who might otherwise stay home or take a bike or other mode of transportation)?</p> <p>Thanks, Daniel Walker 7416 West 82nd Street Los Angeles (Westchester), CA 90045</p>	<p style="text-align: right;">C2</p> <p>Caltrans Response #12 Continued:</p> <p>L. LA Metro, City of Los Angeles, City of Inglewood and perhaps Federal Government assistance through the American Recovery and Reinforcement Act.</p> <p>M. No, the traffic models for this project do not assume a constant number of total trips will be made by commuters on Interstate 405 and local streets with the no-build and build alternatives. The improvements from this proposed but rejected project are projected to induce additional commuters. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to your questions. Data is provided for 2008 and 2035.</p>
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Mr. Ronald Kosinski 
Deputy District Director
Caltrans
Division of Environmental Planning (Arbor Vitae)
100 South Main Street MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski,

Thank you for the opportunity for public review and invitation to comment on the proposed interchange at the 405 and Arbor Vitae.

Enclosed are my comments to the Draft Environmental Assessment/Initial Study recently published for the proposed 405/Arbor Vitae interchange.

The enclosed comments supersede the comments that I had submitted at the January 19th public hearing presentation where new information became available.

Please include these comments dated 1/28/10 in place of the undated comments received at this public hearing.

Thank you,


David Coffin
Neighborhood Council of Westchester/Playa
10th District Seat.
310-383-8337 cell

COMMENTS TO THE
DRAFT ENVIRONMENTAL ASSESSMENT/INITIAL STUDY

Mr. Ronald Kosinski
Deputy District Director
Caltrans
Division of Environmental Planning (Arbor Vitae)
100 South Main Street MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinski,

Thank you for the opportunity for public review and invitation to comment on the proposed interchange at the 405 and Arbor Vitae.

After having read the initial draft environmental assessment/initial study (EA/IS), there appears to be a number of critical details missing in the study.

The Draft EA/IS does not cover the traffic impacts that the proposed Interstate 405/Arbor Vitae interchange would have on the surrounding communities. Specifically on Arbor Vitae in both east and west directions.

In order for surrounding communities to properly assess the impact this project would have on them, a thorough traffic study needs to be performed.

Missing in the Draft EA/IS is a detailed analysis of number of vehicle trips through the current and proposed on-ramps and off-ramps (see Table I) noted in the report. Also missing is an analysis of vehicle trips through all major intersections (see Table II & III) within 2 miles that would be serviced by this project.

The Draft EA/IS provides only a sum total of vehicular trips passing through these points at peak hours and a daily average. The study does not provide any details or data to support the study's vehicle trip number totals and it says nothing about where they are going or how the study came up with these numbers.

For instance, of the study's reported vehicles exiting NB405 at Arbor Vitae, how many of the roughly 20,000+ vehicles are heading east into Inglewood and west into Westchester/LAX? How many of the 21,000+ vehicles in the opposite direction are entering the SB 405 on ramp and from what direction?

Similarly, the Draft EA/IS fails to anticipate and project the amount of "cut through" traffic that the proposed 405/Arbor Vitae interchange would generate. In order to avoid the Manchester Off-ramp, many drivers might choose to use the Arbor Vitae off-ramp and take shortcuts through residential streets such as Oak Street, Cedar Ave and Inglewood Ave. to finally make their way to Manchester.

COMMENT TO ARBOR VITAE DRAFT EA/IS
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Caltrans Response #13:

A. A thorough traffic analysis has been performed by CH2M Hill that includes the impacts that the proposed but rejected half interchange would have on Arbor Vitae Street west and east of the Project Study Area and on the surrounding communities.

B. The traffic analysis includes a detailed analysis of number of vehicle trips through the current and proposed but rejected Onramps and Offramps and an analysis of vehicle trips through all major intersections within 2 miles that would have been serviced by this project. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for 2035 AM and PM Synchro Traffic analysis for Data on Alternatives 1 (No-Build) and 2 (Half Interchange with two-lane Arbor Vitae).

C. To determine where the vehicles were traveling beyond the Project Study Area and provide details about the vehicle trips totals, a traffic analysis was completed by CH2M Hill.

D. With Alternative 2 (2035), 16,476 vehicles per day will head east into Inglewood and 12,276 vehicles per day will head west into Westchester/LAX on Arbor Vitae Street and 17,220 vehicles per day are entering the Southbound Onramp. It is not known from which directions vehicles are coming from.

E. Comments noted. Thank you for your comments.

The EA/IS suggests that the proposed Arbor Vitae off-ramp will be serving almost three times as many cars as the Manchester Blvd off-ramp serves today. This project represents a monumental expansion in this quiet thoroughfare that could impact property values and housing and it deserves an in depth look.

In order to avoid the unintended consequences of an ill planned project, a more complete and thorough analysis needs to be provided by Caltrans to city officials, residents and businesses to provide a complete picture of the projects impact on the community and Interstate 405's commuters.

The following are questions that need to be addressed in the initial draft environmental assessment/initial study (EA/IS) to facilitate a clearer understanding of the project.

1. Has Caltrans undertaken a study of the Interstate 405/Arbor Vitae interchange in accordance with the Highway Capacity Manual 2000?

Exiting the 405 (Table I):

2. As northbound and southbound vehicles exit the proposed interchange at Interstate 405 and Arbor Vitae, how many vehicles are heading eastbound on Arbor Vitae towards Inglewood? How many are heading westbound on Arbor Vitae towards Westchester/LAX?
3. As northbound and southbound vehicles exit the interchange at Interstate 405 and Manchester, how many vehicles are heading eastbound on Manchester? How many are heading westbound on Manchester?
4. As northbound and southbound vehicles exit the interchange at Interstate 405 and Century, how many vehicles are heading eastbound on Manchester? How many are heading westbound on Manchester?

Entering the 405 (Table I):

5. As vehicles enter Interstate 405 from the proposed northbound and southbound off-ramps on Arbor Vitae, how many vehicles were heading east on Arbor Vitae? How many were heading west on Arbor Vitae?
6. As vehicles enter Interstate 405 from the northbound and southbound off-ramps at Manchester Ave, how many vehicles were heading east on Manchester? How many were heading west on Manchester?
7. As vehicles enter Interstate 405 from the northbound and southbound off-ramps at Century Blvd, how many vehicles were heading east on Century? How many were heading west on Century?
8. Below are tables of important intersections that would be served by the proposed project. In order to adequately assess the impact of the project on the community, Caltrans needs to provide traffic counts at each of the following intersections or provide an independent traffic study that would similarly provide the number of vehicle trips through intersections within a two mile radius of the project. Please provide this information:

Questions continued on page 18.

COMMENT TO ARBOR VITAE DRAFT EA/IS
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Caltrans Response #13 Continued:

1st and 2nd Paragraph Comments noted. Thank you for your comments.

A. A traffic analysis by CH2M Hill was commissioned for this project to address these concerns. The traffic analysis of the proposed but rejected Interstate 405/Arbor Vitae interchange is in accordance with the Highway Capacity Manual 2000.

B. In regards to exiting Northbound Interstate 405, with Alternative 1, no vehicles per day in 2007, 2014, and 2035 will travel along Arbor Vitae Street as the Half Interchange will not be built. With Alternative 2, from Northbound 405, no vehicles per day in 2007, 8943 in 2014, and 21,017 in 2035 will travel either east into Inglewood or will travel west into Westchester/LAX on Arbor Vitae Street.

C. In regards to exiting Northbound Interstate 405, with Alternative 1, 17,852 vehicles per day in 2007, 19,140 in 2014, and 23,588 in 2035 from Northbound 405 traveled or will travel either east into Inglewood or headed or will travel west into Westchester/LAX on Manchester Avenue. With Alternative 2, from Northbound 405, 17,852 vehicles per day in 2007, 15,068 in 2014, and 8,072 in 2035 traveled or will travel either east or west.

D. In regards to exiting Southbound Interstate 405, with Alternative 1, 15,098 vehicles per day in 2007, 16,188 in 2014, and 19,950 in 2035 from Northbound 405 traveled or will travel west into Westchester/LAX on Century Boulevard. 4183 vehicles per day in 2007, 4485 in 2014, and 5528 in 2035 from Northbound 405 headed or will head east into Inglewood on Century Boulevard. With Alternative 2, from Northbound 405, 15,098 vehicles per day in 2007, 15,433 in 2014, and 16,714 in 2035 traveled or will travel west on Century Boulevard. 4183 vehicles per day in 2007, 4299 in 2014, and 4727 in 2035 from Northbound 405 headed or will head east into Inglewood on Century Boulevard.

E. In regards to entering Southbound Interstate 405, with Alternative 1, no vehicles per day in 2007, 2014, and 2035 will come from Arbor Vitae Street as the Half Interchange will not be built. With Alternative 2, entering Southbound 405, no vehicles per day in 2007, 8376 in 2014, and 20,097 in 2035 will travel from Inglewood in the east or from Westchester/LAX in the west on Arbor Vitae Street.

<p style="text-align: right;">COMMENT TO ARBOR VITAE DRAFT EA/IS D. Coffin</p> <p style="text-align: right;">Page 3 of 20 1/28/2010</p>	<p style="text-align: right;">C3</p> <p>Caltrans Response #13 Continued:</p> <p>F. from previous page In regards to entering Southbound Interstate 405, with Alternative 1, 6223 vehicles per day in 2007, 6672 in 2014, and 8223 in 2035 will come from eastbound Manchester Avenue. 10,201 vehicles per day in 2007, 10,937 in 2014, and 13,479 in 2035 will come from Westbound Manchester Avenue. With Alternative 2, entering Southbound 405, 6223 vehicles per day in 2007, 6526 in 2014, and 7553 in 2035 will travel from eastbound Manchester Avenue. 10,201 vehicles per day in 2007, 10,708 in 2014, and 12,418 in 2035 will come from Westbound Manchester Avenue.</p> <p>G. from previous page In regards to entering northbound Interstate 405, with Alternative 1, 11,426 vehicles per day in 2007, 12,251 in 2014, and 15,099 in 2035 will come from eastbound Century Boulevard. 6325 vehicles per day in 2007, 6782 in 2014, and 8359 in 2035 will come from Westbound Century Boulevard. With Alternative 2, entering northbound 405, 11,426 vehicles per day in 2007, 11,981 in 2014, and 13,862 in 2035 will travel from eastbound Century Boulevard. 6325 vehicles per day in 2007, 6656 in 2014, and 7767 in 2035 will come from Westbound Century Boulevard.</p> <p>H. from previous page A traffic analysis by CH2M Hill was commissioned for this project to provide data for these tables. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document. Data is provided for 2008 and 2035.</p> <p>See page 219 for responses to questions 9. (I.) to 16. (O.).</p>
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Caltrans Response #13 Continued:

CURRENT AND PROJECTED TRAFFIC COUNTS AT INTERSTATE 405/ARBOR INTERCHANGE - Table 1									
Location	2007			2014			2035		
	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
405/Arbor Vitae									
SB 405 heading West on Arbor Vitae	0	0	0						
SB 405 heading East on Arbor Vitae	0	0	0						
NB 405 heading West on Arbor Vitae	0	0	0						
NB 405 heading East on Arbor Vitae	0	0	0						
WB on Arbor Vitae to SB 405	0	0	0						
WB on Arbor Vitae to NB 405	0	0	0						
EB on Arbor Vitae to SB 405	0	0	0						
EB on Arbor Vitae to NB 405	0	0	0						
405/Manchester									
SB 405 heading West on Manchester									
SB 405 heading East on Manchester									
NB 405 heading West on Manchester									
NB 405 heading East on Manchester									
WB on Manchester to SB 405									
WB on Manchester to NB 405									
EB on Manchester SB 405									
EB on Manchester to NB 405									

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

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Caltrans Response #13 Continued:

Century Blvd/405	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
SB 405 heading West on Century									
SB 405 heading East on Century									
NB 405 heading West on Century									
NB 405 heading East on Century									
WB on Century to SB 405									
WB on Century to NB 405									
EB on Century SB 405									
EB on Century to NB 405									

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

In addition to current and projected traffic counts at the proposed interchange, traffic counts need to be performed at major intersections served by the interchange within a 2 mile radius to determine the impact that 17,000 to 41,000 vehicles would have in the surrounding communities. These counts should include through traffic and traffic turning left or right at each of these intersections in all directions (See Table II)

The results of this study would identify whether these streets and intersections have the capacity to service an interchange that is projected to add 17,300 vehicles daily by 2014 and 40,100 vehicles daily by 2035. Streets that are unable to adequately handle large volumes of traffic would likely create significant back ups on the 405 as they do at the SB 405/Rosecrans Ave interchange daily. Similar backups occur on ramps and collectors at NB 405/Manchester Ave and the NB 405/La Cienega collector.

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TRAFFIC COUNTS WITH NO PROJECT

CURRENT AND PROJECTED TRAFFIC COUNTS AT MAJOR INTERSECTIONS - No Project - Table II									
Location	2007			2014			2035		
	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
Arbor Vitae/ La Cienega									
WB through La Cienega									
WB left on La Cienega									
WB right on La Cienega									
EB through La Cienega									
EB left on La Cienega									
EB right on La Cienega									
NB through La Cienega									
NB left on La Cienega									
NB right on La Cienega									
SB through La Cienega									
SB left on La Cienega									
SB right on La Cienega									
Arbor Vitae/Airport Blvd	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Airport Blvd									
WB left on Airport Blvd									
WB right on Airport Blvd									
EB through Airport Blvd									
EB left on Airport Blvd									

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Caltrans Response #13 Continued:

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

Caltrans Response #13 Continued:

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

EB right on Airport Blvd										
NB through Airport Blvd										
NB left on Airport Blvd										
NB right on Airport Blvd										
SB through Airport Blvd										
SB left on Airport Blvd										
SB right on Airport Blvd										
Arbor Vitae/ Oak Street	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	
WB through Oak Street										
WB left on Oak Street										
WB right on Oak Street										
EB through Oak Street										
EB left on Oak Street										
EB right on Oak Street										
NB through Oak Street										
NB left on Oak Street										
NB right on Oak Street										
SB through Oak Street										
SB left on Oak Street										
SB right on Oak Street										
Arbor Vitae/Cedar Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	
WB through Cedar Ave										
WB left on Cedar Ave										

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Caltrans Response #13 Continued:

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

WB right on Cedar Ave										
EB through Cedar Ave										
EB left on Cedar Ave										
EB right on Cedar Ave										
NB through Cedar Ave										
NB left on Cedar Ave										
NB right on Cedar Ave										
SB through Cedar Ave										
SB left on Cedar Ave										
SB right on Cedar Ave										
Arbor Vitae/Inglewood Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	
WB through Inglewood Ave										
WB left on Inglewood Ave										
WB right on Inglewood Ave										
EB through Inglewood Ave										
EB left on Inglewood Ave										
EB right on Inglewood Ave										
NB through Inglewood Ave										
NB left on Inglewood Ave										
NB right on Inglewood Ave										
SB through Inglewood Ave										
SB left on Inglewood Ave										
SB right on Inglewood Ave										

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Caltrans Response #13 Continued:

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

Arbor Vitae/Eucalyptus Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Eucalyptus Ave									
WB left on Eucalyptus Ave									
WB right on Eucalyptus Ave									
EB through Eucalyptus Ave									
EB left on Eucalyptus Ave									
EB right on Eucalyptus Ave									
NB through Eucalyptus Ave									
NB left on Eucalyptus Ave									
NB right on Eucalyptus Ave									
SB through Eucalyptus Ave									
SB left on Eucalyptus Ave									
SB right on Eucalyptus Ave									
Arbor Vitae/Grevillea Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Grevillea Ave									
WB left on Grevillea Ave									
WB right on Grevillea Ave									
EB through Grevillea Ave									
EB left on Grevillea Ave									
EB right on Grevillea Ave									
NB through Grevillea Ave									
NB left on Grevillea Ave									
NB right on Grevillea Ave									

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Caltrans Response #13 Continued:

See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

SB through Grevillea Ave									
SB left on Grevillea Ave									
SB right on Grevillea Ave									
Arbor Vitae/La Brea Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through La Brea Ave									
WB left on La Brea Ave									
WB right on La Brea Ave									
EB through La Brea Ave									
EB left on La Brea Ave									
EB right on La Brea Ave									
NB through La Brea Ave									
NB left on La Brea Ave									
NB right on La Brea Ave									
SB through La Brea Ave									
SB left La Brea Ave									
SB right La Brea Ave									
Arbor Vitae/Myrtle Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Myrtle Ave									
WB left on Myrtle Ave									
WB right on Myrtle Ave									
EB through Myrtle Ave									
EB left on Myrtle Ave									
EB right on Myrtle Ave									

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See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

NB through Myrtle Ave									
NB left on Myrtle Ave									
NB right on Myrtle Ave									
SB through Myrtle Ave									
SB left Myrtle Ave									
SB right Myrtle Ave									
Arbor Vitae/Flower St	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Flower St									
WB left on Flower St									
WB right on Flower St									
EB through Flower St									
EB left on Flower St									
EB right on Flower St									
NB through Flower St									
NB left on Flower St									
NB right on Flower St									
SB through Flower St									
SB left Flower St									
SB right Flower St									
Arbor Vitae/ Prairie Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Prairie Ave									
WB left on Prairie Ave									
WB right on Prairie Ave									

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See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

NB right on La Cienega									
SB through La Cienega									
SB left on La Cienega									
SB right on La Cienega									
Arbor Vitae/Airport Blvd	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Airport Blvd									
WB left on Airport Blvd									
WB right on Airport Blvd									
EB through Airport Blvd									
EB left on Airport Blvd									
EB right on Airport Blvd									
NB through Airport Blvd									
NB left on Airport Blvd									
NB right on Airport Blvd									
SB through Airport Blvd									
SB left on Airport Blvd									
SB right on Airport Blvd									
Arbor Vitae/ Oak Street	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Oak Street									
WB left on Oak Street									
WB right on Oak Street									
EB through Oak Street									
EB left on Oak Street									

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See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

EB right on Oak Street									
NB through Oak Street									
NB left on Oak Street									
NB right on Oak Street									
SB through Oak Street									
SB left on Oak Street									
SB right on Oak Street									
Arbor Vitae/Cedar Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Cedar Ave									
WB left on Cedar Ave									
WB right on Cedar Ave									
EB through Cedar Ave									
EB left on Cedar Ave									
EB right on Cedar Ave									
NB through Cedar Ave									
NB left on Cedar Ave									
NB right on Cedar Ave									
SB through Cedar Ave									
SB left on Cedar Ave									
SB right on Cedar Ave									
Arbor Vitae/Inglewood Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Inglewood Ave									
WB left on Inglewood Ave									

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See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

WB right on Inglewood Ave									
EB through Inglewood Ave									
EB left on Inglewood Ave									
EB right on Inglewood Ave									
NB through Inglewood Ave									
NB left on Inglewood Ave									
NB right on Inglewood Ave									
SB through Inglewood Ave									
SB left on Inglewood Ave									
SB right on Inglewood Ave									
Arbor Vitae/Eucalyptus Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Eucalyptus Ave									
WB left on Eucalyptus Ave									
WB right on Eucalyptus Ave									
EB through Eucalyptus Ave									
EB left on Eucalyptus Ave									
EB right on Eucalyptus Ave									
NB through Eucalyptus Ave									
NB left on Eucalyptus Ave									
NB right on Eucalyptus Ave									
SB through Eucalyptus Ave									
SB left on Eucalyptus Ave									
SB right on Eucalyptus Ave									

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See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

Arbor Vitae/Grevillea Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Grevillea Ave									
WB left on Grevillea Ave									
WB right on Grevillea Ave									
EB through Grevillea Ave									
EB left on Grevillea Ave									
EB right on Grevillea Ave									
NB through Grevillea Ave									
NB left on Grevillea Ave									
NB right on Grevillea Ave									
SB through Grevillea Ave									
SB left on Grevillea Ave									
SB right on Grevillea Ave									
Arbor Vitae/La Brea Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through La Brea Ave									
WB left on La Brea Ave									
WB right on La Brea Ave									
EB through La Brea Ave									
EB left on La Brea Ave									
EB right on La Brea Ave									
NB through La Brea Ave									
NB left on La Brea Ave									
NB right on La Brea Ave									

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SB through La Brea Ave									
SB left La Brea Ave									
SB right La Brea Ave									
Arbor Vitae/Myrtle Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Myrtle Ave									
WB left on Myrtle Ave									
WB right on Myrtle Ave									
EB through Myrtle Ave									
EB left on Myrtle Ave									
EB right on Myrtle Ave									
NB through Myrtle Ave									
NB left on Myrtle Ave									
NB right on Myrtle Ave									
SB through Myrtle Ave									
SB left Myrtle Ave									
SB right Myrtle Ave									
Arbor Vitae/Flower St	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Flower St									
WB left on Flower St									
WB right on Flower St									
EB through Flower St									
EB left on Flower St									
EB right on Flower St									

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See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.

NB through Flower St									
NB left on Flower St									
NB right on Flower St									
SB through Flower St									
SB left Flower St									
SB right Flower St									
Arbor Vitae/ Prairie Ave	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT	PEAK AM	PEAK PM	ADT
WB through Prairie Ave									
WB left on Prairie Ave									
WB right on Prairie Ave									
EB through Prairie Ave									
EB left on Prairie Ave									
EB right on Prairie Ave									
NB through Prairie Ave									
NB left on Prairie Ave									
NB right on Prairie Ave									
SB through Prairie Ave									
SB left on Prairie Ave									
SB right on Prairie Ave									

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Continued from page 2

9. With only two lanes between the 405 and Prairie Avenue, does Arbor Vitae have the capacity to handle 17,319 vehicles daily by 2014 without adding new lanes and subsequently displacing more homes and businesses on each side? Has a full traffic analysis including traffic counts at major intersections within a 2 mile radius been provided to the City of Inglewood?
10. With only two lanes between the 405 and Prairie Avenue, does Arbor Vitae have the capacity to handle 41,114 vehicles daily by 2035 without adding new lanes and subsequently displacing more homes and businesses on each side? Has a full traffic analysis including traffic counts at major intersections within a 2 mile radius been provided to the City of Inglewood?
11. If four lanes were later built on Arbor Vitae between the 405 and Prairie Avenue, would it have the capacity to handle 41,114 vehicles daily by 2035?
12. Has a complete complimentary analysis including traffic counts of local streets and intersections within a 2 mile radius been performed by the City of Inglewood to assess the long term impact of the proposed Interstate 405/Arbor Vitae Interchange?
13. With four lanes between the 405 and Airport Avenue, does Arbor Vitae have the capacity to handle 17,319 vehicles daily by 2014? Has a full traffic analysis including traffic counts at major intersections within a 2 mile radius been provided to the City of Los Angeles?
14. With four between the 405 and Airport Avenue, does Arbor Vitae have the capacity to handle 41,114 vehicles daily by 2035? Has a full traffic analysis including traffic counts at major intersections within a 2 mile radius been provided to the City of Los Angeles?
15. Has a complete complimentary analysis including traffic counts of local streets and intersections within a 2 mile radius been performed by the City of Los Angeles to assess the long term impact of the proposed Interstate 405/Arbor Vitae Interchange?
16. With only two lanes on Arbor Vitae and an expected 17,319 vehicles utilizing this interchange by 2014, how far of a backup caused by vehicles attempting to turn on Arbor Vitae can we expect in both north and south directions on the 405?
17. With only two lanes on Arbor Vitae and an expected 41,114 vehicles utilizing this interchange by 2035, how far of a backup can we expect in both north and south directions on the 405? Would backups on this proposed off-ramp create a similar undesired daily back up that occurs on the SB 405 at the WB Rosecrans interchange where vehicles come to a stop on the far right lane of the freeway during afternoon peak hours and weekends?

COMMENT TO ARBOR VITAE DRAFT EA/IS
D. Coffin

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1/28/2010

Caltrans Response #14 Continued:

I. It would be better for Level of Service (LOS) if additional lanes were added to Arbor Vitae Street for some but not all of the intersections on Arbor Vitae Street between the 405 and Prairie Avenue if the proposed but rejected project was constructed and the additional traffic by 2014 would result. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details. A copy of the traffic analysis was provided to the City of Inglewood.

J. It would be better for Level of Service (LOS) if additional lanes were added to Arbor Vitae Street for some but not all of the intersections on Arbor Vitae Street between the 405 and Prairie Avenue if the proposed but rejected project was constructed and the additional traffic by 2035 would result. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035. A copy of the traffic analysis was provided to the City of Inglewood.

K. The four lane Arbor Vitae Street is no longer under consideration as the No-Build Alternative 1 has been identified as the Preferred Alternative. Thank you for your comment.

L. The City of Inglewood has not performed an analysis with traffic counts of local streets. Per the request of other interested parties and you, we hired CH2M Hill to complete such a study.

M. The four lane Arbor Vitae Street is no longer under consideration as the No-Build Alternative 1 has been identified as the Preferred Alternative. Thank you for your comment. A copy of the traffic analysis was provided to the City of Los Angeles.

N. The four lane Arbor Vitae Street is no longer under consideration as the No-Build Alternative 1 has been identified as the Preferred Alternative. Thank you for your comment. A copy of the traffic analysis was provided to the City of Los Angeles.

O. The City of Inglewood has not performed an analysis with traffic counts of local streets. Per the request of other interested parties and you, we hired CH2M Hill to complete such a study.

18. At the January 19th meeting I was advised by Caltrans officials that the 2014 and 2035 projections in the study **did not include** the Hollywood Park Casino Complex. When this complex is developed, how many additional vehicle trips are projected to be generated by the mixed use redevelopment project at the Hollywood Park Casino Complex when it is completed?
19. If vehicles using the Interstate 405/Arbor Vitae interchange results in moderate to severe backups on the NB 405,
- Will this likely result in pressure on the City of Inglewood to widen Arbor Vitae to four lanes?
 - What economic impact will this have with the resulting loss of small businesses on Arbor Vitae?
 - How many businesses could be lost as a result?
 - How many residential units could be lost as a result?
20. The Draft EI/SA fails to address, anticipate and project the amount of “cut through” traffic that the proposed 405/Arbor Vitae interchange would generate. In order to avoid the Manchester Off-ramp, how many drivers might choose to use the Arbor Vitae off-ramp and take shortcuts through residential streets such as Oak Street, Cedar Ave and Inglewood Ave?
21. During AM and PM peak periods in 2014 and 2034, what is the maximum attainable average number of vehicles that can exit the 405 at the proposed interchange?

David Coffin
 Neighborhood Council of Westchester/Playa
 10th District Seat.
 310-383-8337 cell

COMMENT TO ARBOR VITAE DRAFT EA/IS
 D. Coffin

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 1/28/2010

Caltrans Response #14 Continued:

P. The backup caused in 2014 by vehicles attempting to turn onto Arbor Vitae Street on Northbound and Southbound 405 would be 35 seconds or higher.

Q. The backup caused in 2035 by vehicles attempting to turn onto Arbor Vitae Street on Northbound and Southbound 405 would be 35 seconds or higher. It is unknown if an undesired daily back up that occurs on the Southbound 405 at the Westbound Rosecrans Boulevard Interchange would occur at the Arbor Vitae Street Half Interchange.

R. The additional trips from the Hollywood Park Casino Complex would have been included in the Phase II of the Traffic Analysis. However, since the proposed project will not be built, the Phase II of the Traffic Analysis will not be completed.

S. a. The City of Inglewood already had proposed to widen Arbor Vitae Street to four lanes to accommodate additional traffic from the Hollywood Park Redevelopment Project.

b. Although there are concerns regarding the loss of parking spaces in Inglewood, no concerns have been brought up or studies have been completed regarding the loss of small businesses on Arbor Vitae Street. Any displaced businesses would be aided by the Relocation Assistance Program (RAP).

c. Only a law office would have been displaced by the proposed but rejected project.

d. 7 residential units (4 single family homes and a 1 three unit complex) would be affected by this proposed but rejected project.

T. “Cut through” traffic was not addressed or projected in the proposed but rejected project’s Traffic Analysis. Had the build alternative been identified as the Preferred Alternative, “cut through” traffic would have been analyzed.

U. At the proposed but rejected half interchange, 1285 and 1420 vehicles per hour can exit Northbound Interstate 405 in 2035 during the AM and PM Peaks, respectively (Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document).



ARSAC Alliance for a Regional Solution to Airport Congestion
 322 Calaver Blvd., #231 Playa del Rey, CA 90203
 310 641-4100 info@creationalsolution.org

February 3, 2010

CA Department of Transportation, District 7
 Attn: Ronald Kosinski, Deputy District Director *RK*
 100 Main Street, MS 16A
 Los Angeles, CA 90012

Re: CalTrans EA 49160 New South Half I-405 Arbor Vitae Interchange

Dear Sir:

Our organization has worked over the past 15 years to improve local traffic around LAX in addition to our larger goal of developing a network of Southern California airports.

The subject EA denies any relationship to LAX in some sections while acknowledging its significance to LAX in others. It focuses on the desire to improve local ground traffic. The proposed solution, Alternative 2, is neither necessary nor appropriate.

Although we have consistently opposed installation of an interchange at Arbor Vitae over past years because it may provide the opportunity to create a "ring road access" to Pershing and the western side of LAX with resultant expansion that is not the basis of this opposition.

The EA notes that freeway traffic within the project area is already gridlocked during many hours of the day and that this project will not improve that condition. It focuses on the need to improve local traffic flows. It states that major issues occur at the Manchester and Century off-ramps and calls for a new southbound I-405 access with new flyover on-ramp.

The EA traffic capacity tables show that the off-ramps are within capacity, but provide poor service levels. The Manchester northbound freeway exit egress is not optimal. The single lane exit from the access road paralleling the main lanes is a bottle neck causing traffic to back up. Installation of a second, optional exit lane by removing the island bump out along with better Manchester signalization would be of more help than the proposed solution—and it would be far less expensive.

The new southbound fly-over on-ramp merges with the extended length Manchester/Olive entrance to the freeway in an area which is already complicated by proximity to the I105 connections. We do not see major back up at this on-ramp. We do, however, note that adding another lane for multidirectional merging will be counterproductive on the I-405 as is seen on the I-605/I-105 connection.

Caltrans Response #14:

A. No-Build Alternative 1 has been identified as the Preferred Alternative. Thank you for your comments. Responses to comments will be in the following pages.

The argument that more capacity is needed for the Inglewood building programs is also soft at best since there is no problem with the Olive entrance backing up and that those wishing direct access to the I-105 have a superior access at Prairie Boulevard.

We are disappointed that Los Angeles residents and others had to choose between an LAX meeting and CalTrans Arbor Vitae meeting held at the same time. Outreach into Westchester was minimal as the first time we found out any project details was when a CalTrans delegation attended the Neighborhood Council of Westchester-Playa (NCWP) on January 8. Although I was told that postcards were supposed to have been sent out to eastern Westchester a straw survey at both NCWP and at the Westchester Neighbors Association revealed that no one had received one. I personally saw no meeting notices for the meeting, but did speak with cooperative, knowledgeable CalTrans staff.

We wish to recognize and thank CalTrans for efforts to not further complicate LAX traffic by again removing the "LAX Next 5 Exits" from the Slauson/Jefferson southbound shoulder that had been reinstalled in error.

We have attached an LAX e-mail affirming our working together to reduce local traffic via the removal of that sign.

In summary, the amount of work put into the EA is obviously tremendous, but urge CalTrans to develop a project that will help freeway traffic flow in the region. The design should reduce the complications of merging so that accidents are reduced. Traffic gridlock from a past accident on the San Diego Freeway (I-405) resulted in as many as 30,000 people missing flights.

Sincerely,



Denny Schneider, President
Alliance for a Regional Solution to Airport Congestion

Attachments:

Detailed EA comments package

E-mail from Mike Molina, LAWA Deputy Director, dtd 1-25-2010

Caltrans Response #14 Continued:

B. The date, time and location of the public hearing was selected by the Office of Environmental Planning. I am not aware that this was done intentionally to conflict with the LAX meeting. Caltrans was only made aware of the LAX Community Meeting only two weeks before it was scheduled. Neither meeting could be rescheduled at that late date. Traffic and merging comments and questions will be answered in the responses to the comments and questions that address the draft environmental document directly.

Summary of Comments on Paste IS/EA Cover Page

Page: 3

Number: 1 Author: Denny Portable 4-08 Subject: Highlight Date: 1/14/2010 10:30:57 AM

Number: 2 Author: Denny Portable 4-08 Subject: Highlight Date: 1/14/2010 10:32:29 AM

Number: 3 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/14/2010 10:43:05 AM
 Where are the sound walls and how high are they? Will they have shrubs or plants attached to discourage graffiti?

Caltrans Response #14 Continued:

C. There are two sound walls recommended for this project.

Along the right-of-way on the northbound Century Blvd Onramp to the northbound offramp to Arbor Vitae Street. The recommended height is 10 feet and approximately 2,445 feet long.

Along the southbound Olive Street Onramp. The minimum recommended height is 16 feet and approximately 814 feet long.

The final height, location, and aesthetics are determined by Design considering other engineering and non-engineering factors.

However, No-Build Alternative 1 has been identified as the Preferred Alternative. These two sound walls are not applicable to the No Build Alternative.

Caltrans Response #14 Continued:

Page: 4

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/18/2010 5:54:23 PM

Is there a survey to show that people in the new construction are going to/from the South Bay? If they are going east on the 105 they would go directly to the 105 and bypass the 405.

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/14/2010 10:45:40 AM

The devil is in the details since this area already backs up on the freeway and adding another lane to traverse in going on/off can cause slow downs of their own.

A. No, there is no survey to show whether or not if people in the proposed but rejected construction would be going to and from the South Bay. Also, it is likely that motorists would go directly to Interstate 105 to avoid the traffic on Interstate 405.

However, No-Build Alternative 1 has been identified as the Preferred Alternative.

B. Comment noted. Thank you for your comment.

SUMMARY

Currently Considered Alternatives		
HUMAN ENVIRONMENT	ALTERNATIVE 1 (NO-BUILD)	ALTERNATIVE 2 (BUILD)
Land Use	No impact on existing land uses of built-out, urbanized environment.	Minimal impact on existing land uses of built-out, urbanized environment with takings of 9 residences, 1 pest control business, and 1 commercial office.
Growth	This project is not anticipated to induce growth beyond existing projections.	This project is not anticipated to induce growth beyond existing projections.
Community Impacts	None.	1) Temporary traffic/circulation impacts related to construction. 2) Seven full takes of properties (9 residences, 1 pest control business, 1 commercial office).
Utilities, Community Facilities and Emergency Services	None.	Temporary traffic/circulation impacts related to construction.
PHYSICAL ENVIRONMENT	ALTERNATIVE 1 (NO-BUILD)	ALTERNATIVE 2 (BUILD)
Hydrology and Floodplain	None.	Construction of south half interchange structure will not encroach upon any water bodies or floodplains.
Water Quality and Stormwater	None.	No impacts on water quality or stormwater were identified as a result of the construction of the half interchange.
Geology/Soils/Seismic/Topography	No adverse impacts have been identified.	No adverse impacts have been identified.
Hazardous Waste/Materials	None.	No properties of concern next to Caltrans right-of-way identified as having potential impacts during construction.
Air Quality	None.	No adverse impacts have been identified.
Noise	None.	1) Future noise levels after completion of the project are anticipated to decrease by 1 decibel with the addition of 2 soundwalls. 2) Temporary increase in noise levels during construction, but these impacts are mitigable.
Natural Communities	No adverse impacts have been identified.	No adverse impacts have been identified.
Wetlands and Other Waters	No adverse impacts have been identified.	No impacts on wetlands and other waters were identified as a result of the construction of the half interchange.
Plant Species	No adverse impacts have been identified.	No adverse impacts have been identified.
Animal Species	No adverse impacts have been identified.	No adverse impacts have been identified.
Threatened and Endangered Species	No adverse impacts have been identified.	No adverse impacts have been identified.

Caltrans Response #14 Continued:

- A. There are 4 single family homes and 3 multi-unit buildings.
- B. The City of Inglewood 2006 General Plan and Southern California Association of Governments Projections from the 2008 Regional Transportation Plan are the sources for the Growth Section of this document. These two sources do not take individual developments such as the Hollywood Park Redevelopment and CONRAC in Manchester Square into account individually. Rather, they analysis economic and population growth as a whole in the City of Inglewood.
- C. The freeway access issues would have occurred during the construction of the sound walls and traffic would have increased near homes along the freeway.
- D. The Arbor Vitae New South Half Interchange Project is located within the Creek Watershed and Dominguez Channel in the northwestern corner of the Los Angeles Basin. There will be no changes to the watershed or other water body.
- E. The Newport-Inglewood Fault-Zone is located 0.8 miles (1.2 km) to the northeast of the project. Ground shaking is anticipated to be most likely the earthquake phenomenon that could have an impact on the proposed project. However, any proposed structure (bridge and/or wall) for this project shall be designed to comply with Caltrans Seismic Design Criteria to ensure that damage in a large earthquake event along this fault and/or other distant earthquake fault is minimized.
- F. There are 10" petroleum pipeline along Ash Ave and 10" same pipeline along Arbor Vitae bridge which are outside of the proposed layout (no conflict). They will have to be protected in place during construction.

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Number: 1	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 10:51:58 AM
The summary says 7 parcels, nine homes. Is this because some are multifamily units (condo or apartments)?			
Number: 2	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 10:55:31 AM
What are the existing projections and what does the basis include? Built out Hollywood Park condos/homes? Manchester Square as CONRAC? Other uses for MS? Walmart or other big box stores in Inglewood or "off LaCienega areas?"			
Number: 3	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 10:56:58 AM
Access to freeway via holes in sound wall or increased traffic near homes along freeway?			
Number: 4	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 10:58:17 AM
Where does the floodwater channel cross this area? Watershed or other changes?			
Number: 5	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:00:04 AM
The Inglewood fault is along here. Where does it impact? Is larger bridge more susceptible to problems?			
Number: 6	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:01:37 AM
There's a sizeable petroleum pipeline going through this area along the freeway. Is it exposed? Any other pipes or other infrastructure?			
Number: 7	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:05:17 AM
How many additional cars will be facilitated? If slowed, how much additional fuel will be consumed? How is air quality impacted for small particle issues since the wall can push some contamination further inland.			
Number: 8	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:06:12 AM
Are new noise impact areas created by the bouncing of sound?			
Number: 9	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:07:30 AM
There is already a "natural community" separation of the Centinela Adobe from Inglewood. Anything worse?			

Caltrans Response #14 Continued:

G. It is not known how many additional cars would be facilitated by this project nor how much additional fuel would be consumed if this project was built.

H. Per Caltrans October 1998 Technical Noise Supplement, several traffic noise studies performed by Caltrans and independent researchers have determined that noise reflected from soundwalls is very minimal and negligible. Reflected noise levels are typically in the order of 1 to 2 dBA. Humans generally cannot perceive noise levels in this range.

3 decibels (dBA, Leq) change in noise level is the widely accepted perception level for the average healthy human ear.

I. Within the proposed project limits the site was evaluated for its value as potential habitat to species of concern. The site was found to provide extremely poor habitat to most wildlife and native vegetation. Within the proposed project limits, there is little to no native vegetation, it is highly disturbed from human activity and is adjacent to heavy urban development. There are also, no sensitive species or habitats within or directly adjacent to the project limits. Therefore, the proposed project area is not considered a viable natural community and little impact to biological resources would result from the construction of the proposed project.

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Number: 1	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:14:26 AM
How would this impact the long southbound on ramp a block south of Manchester? When it enters the 105 there's already crossover issues of people getting on the 405 vs those getting off the 405 and on to the 105.			
Number: 2	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/14/2010 11:15:49 AM
This is similar in schedules for several LAX major projects and Howard Hughes Center as well as the Culver City office tower (xxxx).			
Number: 3	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/18/2010 6:04:42 PM
Why is the proposed project study area not the full red lined area? Where (what communities and specific streets) was notice mailed or delivered about release of an NOP and other information?			

Caltrans Response #14 Continued:

- A. The Arbor Vitae Street Southbound Onramp will reduce the number of vehicles traveling the long Manchester Avenue southbound onramp.
- B. The Arbor Vitae Interchange project goes back to 1976 and any correlation to other projects in the area is purely coincidental and not intentional. Caltrans was not aware of the other projects until after the Project Approval Environmental Document Phase began two years ago.

However, No-Build Alternative 1 has been identified as the Preferred Alternative and thus the neighboring projects will not lead to cumulative impacts on this project.
- C. Public outreach efforts were extensive for this proposed project. Last summer, Caltrans and Consensus Staff met with City of Los Angeles and City of Inglewood staff regarding this project. Newspaper ads were placed in La Opinion, the Los Angeles Watts Times, the Daily Breeze, the Argonaut, the Los Angeles Centennial and Inglewood Today starting on December 21 and again on January 12. Consensus Group staff mailed more than 5,000 postcards to neighboring residents and businesses within a two-and-a-half mile radius of where the proposed project would be built. They also walked along Ash and Arbor Vitae and spoke to businesses and residents that were immediately adjacent to the proposed project.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/14/2010 1:24:41 PM

The ramp will be very constraining in competition with those coming along the other ramp and shortly after trying to get onto the 405 instead of the 105.

A. The Caltrans Highway Design Manual would have been followed so that the proposed but rejected build alternative would have been compliant with current highway design standards. The proposed SB Onramp will result in an additional merge on the SB I-405 freeway. Due to congestion on the mainline freeway, the I-405/I-105 weave following the proposed Onramp is not expected to worsen significantly.

<p>Page: 13</p> <hr/> <p>Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/18/2010 6:27:21 PM What projects have been assumed in the vehicular traffic numbers for the 405? What portion is assumed from LAX? Did it include the new Howard Hughes project that will in aggregate be over a million square feet? What about the 24 story building in Culver City recently approved located at Sepulveda and Centinela?</p> <hr/> <p>Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 8:10:29 AM This assessment matches anecdotal observations. How will the Arbor Vitae off-ramp fix this and allow 105 users to get over for the Century off-ramp?</p>	<p style="text-align: right;">C4</p> <p>Caltrans Response #14 Continued:</p> <p>A. Only the upcoming Hollywood Park Development, not the Howard Hughes project or the building at Centinela and Sepulveda, were not included in the Traffic Analysis of this project. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details. No portion of the vehicle traffic was assumed to be from Los Angeles International Airport (LAX).</p> <p>B. It would reduce the number of vehicles taking the Century Boulevard offramp. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for additional details.</p> <p>The new northbound offramp at Arbor Vitae Street will not allow Interstate 105 users to use the I-405 Century Blvd northbound offramp, but would allow those motorists to use the Arbor Vitae Street exit instead of the Manchester Avenue exit.</p>
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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 9:29:14 AM
 What is the basis for the statement that the accident rates will be reduced? Since the current design is compared to "similar" and found to have higher incident rates what is being changed to reduce the likelihood of accidents?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 9:33:22 AM
 Since the "Weaving and merging of traffic..." is a major aggravation of the stop and go traffic condition, what in the new addition of another on-ramp will reduce this?

Number: 3 Author: Denny Portable 4-08 Subject: Highlight Date: 1/19/2010 9:34:53 AM

Number: 4 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 9:37:30 AM
 The traffic counts are forecasting substantial increases for the project study area. The area just north is much worse and comes to a complete stop already. How will addressing slow downs prior to a full stop fix a problem on the I405?

Number: 5 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 9:47:35 AM
 The AADT on the south end of the study area is reported to be 2900 greater than the north area. Was there a study to determine whether the cars were going toward the new Inglewood developments or toward LAX? If LAX, what acceleration factors are assumed for future growth?

Caltrans Response #14 Continued:

A. The TASI Traffic Data from 2004 to 2007 is the basis for stating that accident rates will be reduced. See pages five through seven of the Final Environmental Document for more details.

B. The Arbor Vitae Street southbound onramp will reduce the number of vehicles traveling the Century Boulevard and Manchester Avenue intersections to reduce stop and go traffic conditions.

D. This proposed but rejected project would not have improved congestion along the Interstate 405 Mainline.

E. A study was not done to determine whether the vehicles were to be heading toward the Hollywood Park Redevelopment Project or toward LAX. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details. No portion of the vehicle traffic was assumed to be from Los Angeles International Airport (LAX).

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 10:03:32 AM

The off-ramp is purported to improve LOS with the build option, how will this impact the other portions of the freeway? It appears that the major improvement is at Manchester, not Century. Could this also be improved by fixing the defective Manchester off-ramp which reduces to one lane at one point instead of doing the Arbor Vitae project? What change would be necessary at Manchester to accomplish this?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 10:08:59 AM

Has Caltrans prepared a graphic representation of this traffic that is color coded to show numbers of cars? Where can it be obtained? Does it show details of the bottle necks? What are the sites where specific collector-distributor roads can be improved?

Caltrans Response #14 Continued:

A. The mainline portion of Interstate 405 would not have had its congestion improved. Congestion will be reduced and Level of Service (LOS) improved at the Century and Manchester Avenue Interchanges. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details.

B. No, Caltrans has not prepared a color-coded graphic representation of traffic to show the number of cars. A new traffic analysis by CH2M Hill illustrates bottle necks and includes two traffic scenarios with improvements to local roads but not to the collector-distributor roads of the intersections within or near the project study area.

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Number: 1	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/19/2010 10:13:57 AM
Since there is a better (but poor) experience at Century compared to the 105 one can infer that some cars are leaving the freeway. Which way are they going? How many are going toward LAX versus the new developments in Inglewood?			
Number: 2	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/19/2010 10:18:29 AM
How many cars are going to/leaving University of WLA during the peak hours, Casino, Forum, or Centinela? If many of these cars are going onto the 1105 using the 405 as a transition what number could go directly to a more easterly on-ramp of the of the 1105 directly?			
Number: 3	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/19/2010 10:22:20 AM
If the LA General Plan were followed it wouldn't be allowing more development in areas where the infrastructure is already maxed out without a specific plan for remedy. How does this in any way justify adding more capacity enhancement to deliver traffic into the local communities?			
Number: 4	Author: Denny Portable 4-08	Subject: Highlight	Date: 1/19/2010 10:25:37 AM
Number: 5	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/19/2010 10:28:18 AM
Presenters have routinely stated that this project is not related to LAX expansion yet this statement says, "provide direct access to Los Angeles International Airport..." How does this not add capacity to LAX since auto access is a primary limiting factor for passenger capacity?			

Caltrans Response #14 Continued:

A. A study was not done to determine whether the vehicles were to be heading toward the Hollywood Park Casino and Redevelopment Project or toward LAX. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details. No portion of the vehicle traffic was assumed to be from Los Angeles International Airport (LAX).

B. A study was not done to determine whether the vehicles were going or will go to or leaving from the University of West Los Angeles, Hollywood Park Casino, the Forum, or Centinela Hospital. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details.

C. As the project study area is built out, no additional development would have been encouraged by the rejected build alternative. The proposed project would provide access to the Hollywood Park Casino and Redevelopment Project, the University of West Los Angeles, Centinela Hospital, and the Forum.

The proposed half interchange does not affect whether or not whether new development is allowed. As discussed in the environmental document, the project is consistent with the general plan in that it is attempting to maximize the efficiency of the existing infrastructure.

E. Several errors were made in the Draft Environmental Document in saying that the proposed but rejected project "provide direct access to Los Angeles International Airport." This is not the case as the project is not adjacent to the entrance of the airport for arriving and departing passengers. The proposed project would provide access to the Hollywood Park Casino and Redevelopment Project, the University of West Los Angeles, Centinela Hospital, and the Forum.

The proposed half interchange does provide more direct access to the Los Angeles International Airport. However, according to the Airport, auto access is not a primary limiting factor for adding passenger capacity at the airport.

Caltrans Response #14 Continued:

Page: 21

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 1:04:47 PM
 Is the Ash Ave cul-de-sac closure of a street or a new cul-de-sac? Is the purpose to help with the LOS calculation?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 1:07:47 PM
 If the first "pro" of the project is "not impact mobility on local streets" what specific improvement is made to support local streets since it is supposed to be at best neutral for main 405 traffic service.

A. The cul-de-sac is a design feature that does not involve helping the LOS calculation.

The Ash Avenue cul-de-sac is a result of the closure of the Ash Avenue connection with Arbor Vitae Street. The purpose of the cul-de-sac is to eliminate the intersection so that intersection spacing requirements can be satisfied.

B. The proposed but rejected project would have helped relieve congestion at the Century Boulevard and Manchester Avenue Interchanges.

It is agreed that the statement is somewhat unclear and may be misleading. The pro an con section under Build Alternative 2 has been removed from the Final Environmental Assessment as the No-Build Alternative 1 has been identified as the Preferred Alternative.

Page: 22

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 1:22:50 PM
 What is the name of the aquifer that runs along the freeway and towards LAX in that area. Has the area along this part of the freeway been tested for fairy shrimp? There is an earthquake plume in this area. Where, specifically is it and are any extra actions necessary to accommodate it?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/19/2010 1:19:51 PM
 Isn't there a high accident rate near the Manchester Ave Tunnel? Is there an alternative to reduce accidents there? What is it?

Caltrans Response #14 Continued:

A. The name of aquifer that runs along the freeway and towards LAX is West Coast Basin.

The proposed project limits would not encroach on any wetlands or 'Waters of the United States'. The ephemeral pools near the Los Angeles International Airport (LAX) found to contain Riverside fairy shrimp were determined by the United States Fish and Wildlife Services to not be essential for the conservation of the Riverside fairy shrimp, and they were not designated as critical habitat. Riverside fairy shrimp require specific site conditions in order to survive and complete their lifecycle. These conditions do not exist within the project limits. Therefore, the likelihood that Riverside fairy shrimp would occur within the project limits is extremely low to nonexistent.

The nearby Charnock earthquake fault will not lead to an earthquake plume such as a mantle plume. No extra action will be required to accommodate this project as liquefaction susceptibility along this project is considered to be very low.

Any potential ground movement or earthquake fault lines were taken into consideration during the design of the project alternatives. Any alternative selected would be constructed to the latest Caltrans design specifications and standards regarding earthquakes and ground movement of any type.

B. The total accident rate record from July 1, 2004 to June 30, 2007 reveals actual accident rates higher for the mainline I-405 freeway than the state average for similar facilities (1.24 accidents per million vehicles compared to the state average of 1.09 accidents per MVM, respectively). Also, two (2) freeway collectors, two (2) Onramps, and one (1) Offramp within the project limits had actual accident rates higher than the statewide average accident rate for similar facilities. Implementation of Rejected Build Alternative 2 (Arbor Vitae Street New South Half Interchange) would have reduced traffic congestion and may decrease the accident rates on the I-405 freeway system in the project vicinity.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:32:08 AM

There is an enormous amount of vehicles turning right onto Manchester from the 405 exit that backs up. Fixing the off-ramp would do much more than anything else since the traffic still flows in that area going toward Inglewood City Hall.
The idea that TDM is not appropriate is interesting since the new Crenshaw Line train is supposed to be going along Florence east parallel to the area which this project is "supposed" to be addressing. If connection buses were placed in sufficient number and for convenience to destinations serviced more non-auto traffic would become normal. Where are the studies of Hollywood Park Casino and all of the new development to determine where they are coming from? I have never seen excessive traffic from those going to the hospital as visitors or users. Has Caltrans recommended shift times for the employees that doesn't correspond to "rush hour" as has been done at LAX?

Caltrans Response #14 Continued:

A. Traffic data that illustrates where the Hollywood Park project comes from is in the Hollywood Park Redevelopment Environmental Impact Report is included in the traffic analysis of this project. Caltrans would have implemented Best Management Practices from its Transportation Management Plan to minimize traffic around the proposed but rejected project.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:35:05 AM
 Many ares along the freeway used to be sensitive environmental areas long ago before controls were established and it is likely that construction has fully destroyed their viability, but has there been a test for ferry shrimp? They have been found in several other near by locations.

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:37:34 AM
 There is watershed in the area that runs along LaCienega and the Freeway. The area just north of this has a cemented channel to direct water. Is this channel fed from areas within the study area?
 There are also numerous large oil transportation pipes going along the freeway. Where are they located and have these been considered?

A. The area near LAX found to contain Riverside fairy shrimp was found to by the United States Fish and Wildlife Services not to be critical habitat. Riverside fairy shrimp require very specific site conditions in order to survive and complete their lifecycle. These conditions do not exist within the project limits. Therefore, the likelihood that Riverside fairy shrimp would occur within the project limits is extremely low to nonexistent.

B. Historical highest ground water at that area is more than 50 feet and the channel is not fed from study area.

There is a 10" petroleum pipeline along Ash Ave and a 10" pipeline along Arbor Vitae Bridge which are outside of the proposed layout (no conflict). They will have to be protected in place during construction.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:42:46 AM

If the impacts of this project are primarily to impact ground level (non-freeway) traffic, then if the access to the freeway entry going south near access to the I105 could cause even more jam ups on the I405. We have seen larger numbers of people getting off and then returning to the freeway to avoid these jams. What evidence is there that the traffic FROM the I405 southbound will not follow this pattern actually INCREASING ground traffic problems?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:45:33 AM

Agreed that there are no wild or scenic rivers in this area. The only "cultural" aspect would be if people were sight seeing to look at all the graffiti that sprouts along this area regularly. What permanent actions is CalTrans taking to reduce the graffiti in this study area?

Caltrans Response #14 Continued:

A. The phenomenon of traffic going off and on Interstate 405 at intersections within the Project Study Area was not evaluated in this project's traffic analysis. The mainline portion of Interstate 405 would not have had its congestion improved. Congestion will be reduced and Level of Service (LOS) improved at the Century Boulevard and Manchester Avenue Interchanges.

B. Caltrans utilizes context sensitive solutions for its landscaping and best management practices for maintenance to prevent and promptly clean up graffiti within its facilities.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:54:15 AM

The EA refers to 49 U.S.C. 303 section 4(f)...to preserve ...historic sites. A recent expansion of shoulder/ramps impacted the Centinela Adobe along the 405 slope and no action to date has been taken to fix it. Will the additional surface traffic caused by this project cause any problems for historic sites such as the Randy Donunts builidng which is designated historical?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 6:57:36 AM

Since the creeks used to go through this area before the 405 was constructed is there any provisions for ensuring that no burial grounds are found? What are they?

Number: 3 Author: Denny Portable 4-08 Subject: Highlight Date: 1/22/2010 6:57:54 AM

A. No historic sites such as Randy’s Donuts are going to be impacted by this project, nor are any other cultural resources in Los Angeles County going to be impacted by this project. No action by Caltrans in the project area would result in the exposure of a cultural resource to damage by additional traffic surface by this proposed project.

B. This project has completed compliance with the Department of Transportation Act of 1966, specifically Section 4(f) and the National Historic Preservation Act of 1966, specifically Section 106. As such consultation with the Native American Heritage Commission was previously carried out (including a search of the Sacred Lands file). Also consultation was carried out with interested Native American community members as part of the compliance effort. The result was that no cultural resources were identified in the Area of Potential Effect either from surveys, information reviews, or consultations.

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Number: 1 Author: Denny Portable 4-08 Subject: Highlight Date: 1/22/2010 6:58:21 AM

Number: 2 Author: Denny Portable 4-08 Subject: Highlight Date: 1/22/2010 6:58:28 AM

Number: 3 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 7:02:43 AM

The highlighted section mentioning a Baggage Terminal in Manchester Square is misleading at best. It is true that there is "no development timeline or funding for the Manchester Square Redevelopment Project." because there will NOT be a baggage terminal in this area even though this again appears to be used as justification for this project. The Baggage Terminal was removed from the LAX Plans via the 2004 Stipulated Settlement.

Number: 4 Author: Denny Portable 4-08 Subject: Highlight Date: 1/22/2010 7:03:52 AM

Number: 5 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 7:11:35 AM

What specific area, other than that owned by LAX is Airport Landside Areas? There are still residences in some of the areas referred to. How does this project which can drive traffic away from the freeway and on-to surface streets help with "pass-thru" traffic on I405 noted in the Westchester-Playa Del Rey Community Plan by reducing vehicle hours traveled on this highway? The same paragraph refers to widening of Arbor Vitae street overcrossing to accommodate the roadway widening. How does this reduce local traffic and not support LAX traffic growth through this area?

Number: 6 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/22/2010 7:16:55 AM

This is an interesting paragraph about the LAX Master Plan since it is only now in study again and not formulated. How would this redistribute LAX traffic and direct traffic off Century toward LAX when the ONLY time that the Century Blvd LAX access is backed up for LAX at non rush hour times. Currently, 2/3 of the traffic entering the Central Terminal area is from Sepulveda. What studies does CalTrans have that shows traffic flow will be improved in ANY way?

Caltrans Response #14 Continued:

C. Comment noted and correction will be made to Final Environmental Document.

E. The Landside Area includes only the following airport and airport supporting facilities as stated in the LAX Community Plan and City of Los Angeles General Plan: Central Terminal Area (CTA), Ground Transportation Center (GTC), Intermodal Transportation Center (ITC), and Consolidated Rental Car Facility (RAC). The area serves as the interface between Airport Airside and the regional ground transportation network, establishing access portals for the efficient processing of people and goods.

F. The traffic analysis conducted by CH2M Hill demonstrates that traffic does improve at several intersections within or near the project study area. These include Manchester Avenue/Ash Avenue/I-405 Northbound Offramp, Olive Street/La Cienega Boulevard/I-405 Southbound Onramp, and Century Boulevard/I-405 Northbound Ramps.

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- Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/23/2010 7:26:09 AM
 Under commuter patterns the statement that by 2035 196,000 vehicles will travel along the I405. What are the assumed projects? Where do most of the increased trips originate? South Bay? Inglewood? Westchester? LAX?
- Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/23/2010 7:33:02 AM
 The commuter pattern sections tries to justify this project by explaining how difficult it is to travel from the I105 north onto the I405 and get off at Century to get to LAX. Don't most travellers to LAX go further on the I105 to Sepulveda Blvd. where there is direct access to LAX? The I105 signage directs people in this way as well, not to the I405.
- Number: 3 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/23/2010 7:35:09 AM
 Under potential impacts the document repeatedly mentions the University of West Los Angeles. How many students are there in 2010 and how many car trips do they account for?
- Number: 4 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/23/2010 7:39:28 AM
 What is the funding status of the Relocation Assistance Program and how many people does it support? What cuts is it subject to given the CA budget crisis? What circumstances are required for people to qualify for that assistance?

Caltrans Response #14 Continued:

- A. No particular projects were presumed to be built with that vehicle traffic estimate in 2035. The geographic locations of the trips were not forecasted in the Traffic Analysis.
- B. While traffic on Interstate 105 was not evaluated in the Traffic Analysis, It is logical that most travelers would access LAX from I-105 rather than the Arbor Vitae Interchange on I-405.
- C. The University of West Los Angeles has 30 students currently enrolled while 4 full time and 27 part time professors teach there. Perhaps 120 vehicle trips will be generated by faculty, students, and staff each day the university is operating.

D. The costs of implementing a highway project are estimated in advance. This estimate includes all of the different functions that will be used to implement the project. The Relocation Assistance Program (RAP) is one of many different functions which fall under this umbrella. The project will not be constructed as the No-Build Alternative has been identified. Therefore, the RAP will not need to be implemented for this project.

The current California budget crisis may have an effect on the project as a whole. In other words, the need for the project as a whole may come into question rather than an individual function such as the RAP. Funding does not affect specific function, but rather the project as a whole.

Our Department of Transportation, Right of Way Manual states: *“The purpose of RAP is to ensure that persons displaced as a result of a state highway project are treated fairly, consistently, and equitably so that such persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole: ...”*

When we continue to proceed with completing a project, the services provided through RAP will continue to be administered regardless of the status of the current CA budget crisis.

The RAP supports how ever many persons that are qualified for the program that may be displaced as a result of a state highway project.

The main circumstance under which a person may qualify to receive RAP benefits is, *“if they are in occupancy of the property being acquired at the time of Initiation of Negotiations (ION). ...”*

- Department of Transportation, Right of Way Manual

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/26/2010 7:53:09 AM

Since this is 2010 it would be interesting to establish what the actual numbers are instead of projections. Especially the locations of new jobs which according to the paragraph above is to show an annual increase of 40K per year many of which will add to the I405 traffic.

A. The actual number of new jobs created in 2010 is not available at this time. This is why the projections from Southern California Association of Governments (SCAG) were referenced in the Draft Environmental Document for this proposed project. Specific locations of jobs are not compiled by SCAG.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 5:51:26 AM

Table 10 indicates zip 90301 not 90045 for Westchester. The numbers appear low based on current estimates of about 90,000 currently. The growth shows a much higher percentage growth than was estimated in previous discussions. Further, the diversity is also much greater. There are more recent surveys; include them in the estimates. Also, there is substantial differences between the eastern and western portions of Westchester that not considered. What are the true numbers for the eastern half for projections?

A. Your correction has been noted. Thank you for your correction.

The 2000 U.S. Census Data was utilized in the Draft Environmental Document and the upcoming 2010 U.S. Census would have more up to date growth estimates and illustrate the current economic, educational, and racial diversity in Westchester zip code 90045.

The eastern and western portions of Westchester are not split up in United States Census or American Community Survey data. Both portions of Westchester are part of the 90045 zip code.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 5:53:49 AM

As with the other tables there is a difference between the Table 11 title (90304) and the heading of the table itself (90301)...

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 5:59:09 AM

The real question of impacts on people is the air particles spewed due to slowing traffic on the I 405. If more of the Lennox people are children then they are more susceptible right along the area where the southbound entrance will merge with the western Olive/Manchester southbound entrance to the freeway and with the I 105 overpass entrance. Isn't this the real impact of this project?

Caltrans Response #14 Continued:

A. Your correction has been noted. Thank you for your correction.

B. The comment would only be a small portion of the project's impact. The real impact of the project is discussed in the Air Quality Assessment.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:04:25 AM
 Property value impacts is understated because the Manchester Square area to the west has been generally purchased by LAWA for LAX use. It is unknown what is planned for the area, but it is certain that it will be economic improvement of some sort since housing is no longer an option.

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:11:44 AM
 There may, or may not be improvement on surface streets, but the impact on the freeway traffic which accounts for a larger portion of the traffic movement will be negative. Further, for the westside southbound Olive/Manchester onramp there is seldom below C- impacts. The traffic on LaCienega that parallels the I 405 is also seldom stop and go. Widening of the bridge at Arbor Vitae could allow a right turn to this Olive/Manchester onramp without building this major part of the project. Why is this not considered as an alternative? If the objective is to get the growth from Inglewood (which previous paragraphs say is smaller than the other communities) to the I 105 wouldn't they be better served by going directly to the I 105 instead of via the 405 interchange? What analysis of this alternative has been made? Where are the results of this analysis?

Caltrans Response #14 Continued:

A. Comment noted. Thank you for your comment. Property values in the project vicinity will increase as the economy improves.

B. Widening of the bridge on Arbor Vitae Street was studied in the traffic analysis of this project. As Interstate 105 is outside of the project study area, traffic going to I-105 was studied in the traffic analysis.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:16:27 AM

The traffic "improvement" on local streets is a primary argument for this project Alternative 2, but as we have seen traffic going to LAX has been disbursed into the community by CalTrans signs and directions to get off the freeway before Century. When even more gridlock on the freeway is created by people getting onto yet another criss-cross onramp southbound won't this drive more traffic onto community streets? Where is the analysis of this and what are the specific results? How will this added congestion encourage people to visit this area for commercial purposes hand help existing businesses and residents?

Caltrans Response #14 Continued:

A. More traffic will come onto Arbor Vitae Street and nearby roads if this project was constructed. Added congestion will not encourage people to visit this area for commercial purposes and not help existing businesses and residents in the vicinity of Arbor Vitae Street. That is partially why the No-Build Alternative was identified.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:26:36 AM

The intersection of the new overpass with the Olive on-ramp will be another potential accident site with cars getting on being forced to get across several lanes to avoid being placed onto the I 105 and to avoid those trying to get off the I 405 to the I 105 at the same time. How will this increased multilane mess be addressed as it is already a source of problems?

A. The increased multilane mess you described will not result from the construction of this project as No-Build Alternative 1 has been identified as the Preferred Alternative. Upcoming projects on Interstate 405 will attempt to address this problem you described.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:35:38 AM

Open Charter School on Osage in Westchester between LaTijera and Manchester is not listed but is closer than several of these schools...
What about the school at LaTijera United Methodist Church?

A. Comments and corrections noted. Thank you for your comments and corrections.

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- Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:36:52 AM
 What about the two LAX Fire Stations? One is on site and the other is at Aviation/Century.
-
- Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:39:58 AM
 The cue of the I405 Manchester off ramp going north that exits east of the freeway is already pathetic during rush hour, but that has more to do with the single lane bottleneck at the end of the off ramp and the lack of timing of the signals on Manchester. Why not fix this at a far lower cost than any of the proposed projects?
-
- Number: 3 Author: Denny Portable 4-08 Subject: Highlight Date: 1/27/2010 6:40:16 AM
-
- Number: 4 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/27/2010 6:45:39 AM
 The highlighted section of 2.1.6 states "to alleviate congestion issues...access point to major venues... Los Angeles International Airport (LAX)." If this project is not related to LAX as stated in some places of this analysis why is this so stressed as an affected environment? The fact is that when traffic is bottlenecked on the I405 traffic will be driven off the freeway and onto local streets. Since LAX is projected to have substantial increases then this project could cause more problems than it will solve west of the I405. How is this addressed by the project?

Caltrans Response #14 Continued:

- A. Comments and corrections noted. Thank you for your comments and corrections.
- B. Local road improvements at the intersections of Interstate 405/Manchester Avenue and Interstate 405/Century Boulevard were shown to improve traffic on local roads more than the construction of the Arbor Vitae Street South Half Interchange.
- D. Some traffic from Interstate 405 would have been brought onto local streets west of Interstate 405 as a result of this proposed but rejected project. Los Angeles International Airport (LAX) is near the project study area of this proposed but rejected project. This project would not have provided direct access to LAX.

Caltrans Response #14 Continued:

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| Number: 1 Author: Denny Portable 4-08 Subject: Highlight Date: 1/27/2010 6:45:50 AM

| Number: 2 Author: Denny Portable 4-08 Subject: Highlight Date: 1/28/2010 4:47:11 AM

Number: 3 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 4:51:16 AM

This highlighted section again talks about how Alternative 2 supports LAX! It talks about support since the mid-1970s when a ring road was envisioned and a new set of terminals was to be on the west end of LAX. Although this vision has since been supplanted by others apparently CalTrans is stuck in the past and trying to support a non-desire. When is it going to catch up with other plans for LAX improvement?

C. The proposed new terminals on the west end of LAX are no longer part of the LAX Master Plan. The proposed but rejected alternative for this project will not be built. The statement can be reworded to clearly indicate that the project has no connection with LAX.

CHAPTER 2 AFFECTED ENVIRONMENTAL, POTENTIAL IMPACTS AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

Circulation, and provide additional/alternative access to LAX on the west, and Centinela Hospital, Hollywood Park Casino, and the Forum on the east. A need for an alternate route between I-405 and LAX has persisted since the mid-1970s, and has garnered heavy support not just from Los Angeles World Airports (LAWA), LAX's parent company, but also from the Cities of Los Angeles and Inglewood.

Potential Impacts—Interstate 405 Freeway Mainline, and Ramp and Weaving Segments

The freeway mainline analysis for the proposed project is based on methodology published in the Highway Capacity Manual (HCM) 2000. Freeway facilities are composed of connected segments, where each segment may be a basic freeway segment, ramp segment, or weaving segment.

- **Basic Freeway Segments.** These segments are not subject to merge activity.
- **Ramp Segments.** These segments contain an isolated merge or diverge area.
- **Weaving Segments.** These segments have a merge and diverge connected by at least one auxiliary lane.

Each of these types of segments has different operational characteristics, and different analysis procedures. Analysis and methodology of each segment as it pertains to the proposed project follows, utilizing guidelines from the appropriate chapter of the HCM 2000.

Basic Freeway Segments. The measure used to provide an estimate of Level of Service (LOS) is density, where density is calculated from the average vehicle flow rate per lane and the average speed (pc/mi/h). The following figure illustrates the concept of LOS as it pertains to basic freeway segments, and the associated conditions and technical descriptions. The proposed pavement structural section is based on a Traffic Index of 14.

Caltrans Response #14 Continued:

A. and B. The proposed new terminals on the west end of LAX are no longer part of the LAX Master Plan. The proposed but rejected alternative for this project will not be built.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 5:02:39 AM

Tables 19 and 20 are interesting, but there are much simpler ways to improve off-ramp traffic. On the north bound Manchester, for instance, the main bottleneck occurs in two places--at the Manchester signal that could be adjusted and the entrance to the off-ramp which goes to one lane. The bottleneck could be shaved with an alternate turn that would reduce the number of cars "blocked" from getting off and the signal fixed for better exit limiting exit from the small street directly across from the exit. Why weren't these inexpensive alternatives considered?

A. The signal changes you suggested would need to be done by the City of Los Angeles Department of Transportation. They can be contacted at their Western Office located at 1828 Sawtelle Boulevard Room 108 Los Angeles, CA 90025, by telephone at (310) 575-8138, or via email at LADOT.WesternDistrict@lacity.org.

A more inexpensive alternative to modify the existing interchange at Manchester Avenue was not considered, because it would not have satisfied a secondary goal of the project to improve overall accessibility into the project area.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 5:11:39 AM
Table 25 identifies the southbound off ramp at Century will get worse under Alternative 2. Why not have a project to improve this instead of creating an alternative that does nothing for actual freeway traffic and can cause more difficulty in entering the 405 southbound?

Caltrans Response #14 Continued:

A. The proposed but rejected build alternative will not be constructed because the Half Interchange Design would not be approved by Federal Highways Administration (FHWA). Other build alternatives may be proposed by California Department of Transportation in the future that may improve conditions at the Interstate 405 Century Boulevard offramp and entering southbound Interstate 405.

The southbound offramp at Century Boulevard would not worsen under Alternative 2. The table will be corrected accordingly.

CHAPTER 2 AFFECTED ENVIRONMENTAL, POTENTIAL IMPACTS AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

Table 32. Build Alternative 2 Scenario—Delay/LOS Analysis for Signalized Intersections

Intersection	Existing (2017)						JWB						
	AM Peak		PM Peak		All Day		AM Peak		PM Peak		All Day		
	Delay (sec/veh)	LOS											
1. Proposed Oviatt ramp at Interstate-405 and Arroyo Street													
2. Oviatt ramp at Interstate-405 and La Grange Boulevard (south of Century Boulevard)	24.6	C	25.8	C	25.1	C	24.3	C	25	D	34.9	C	better
3. La Grange Boulevard (south of Century Boulevard)	132.7	D	42.2	D	132.1	D	46.7	D	301.1	D	303.8	D	better
4. Oviatt ramp at Interstate-405 and Manchester Boulevard/Arroyo Avenue	201.9	D	81.3	D	128.8	D	31.8	D	208	D	125.4	D	worse
5. Oviatt ramp at Interstate-405 and Century Boulevard	137.6	D	22.4	C	104.0	D	19.7	D	195.3	D	100.1	D	better
6. La Grange Boulevard and Century Boulevard	40.2	E	112.2	D	72.3	E	131.8	D	89.9	D	122.7	D	better
7. La Grange Boulevard and Arroyo Street	29.7	C	42.9	D	64.1	E	35.7	E	136.1	D	223.3	D	worse
8. La Grange Boulevard and Manchester Boulevard	81.3	D	88.9	E	27.6	C	32.8	C	88.2	D	64.3	E	better

sec/veh = seconds per vehicle
LOS = Level of Service

Avoidance, Minimization, and/or Mitigation Measures

Commute Savings

Cost-Benefit Analysis. Vehicles hours traveled increased by 35,583 hours and vehicle miles traveled increased by 13,128 miles on a regional scale with the Build Alternative 2 versus No-Build Alternative 1. On a smaller subregional scale, vehicles hours traveled decreased by 32,776 hours and vehicle miles traveled decreased by 1,942 with Alternative 2 versus Alternative 1. The subregional area created by Jonathan Osborn of the Office of Advance Planning extends from Marina Del Rey, Playa Del Rey, and LAX on the west, the eastern city limits of Inglewood on the east to include Inglewood Park Cemetery, the Forum and Hollywood Park Casino, just north of SR-90 in Los Angeles and Culver City in the north, and just south of I-105 in Los Angeles, El Segundo, and Hawthorne in the south. Cost-benefit ratio is 0.75, below the 1.00 expected of a construction project. Also, any savings to be realized are unlikely to be commute savings since the trips being shortened are mostly noncommute trips bound for LAX. As such, commute savings would be irrelevant. Also, the savings by individual trip are likely to be negligible, fractions of a minute if not a second. The full recovery of the project's costs is 27 years. See Table 33 for the subregional scale statistics below and Table 34 for the regional scale statistics on the following page.

Table 33. Cost-Benefit Analysis (2035) for Subregional Area

Alternative	Vehicle Hours Traveled	Vehicle Miles Traveled
No Build	15,610,620	6,545,023
Build	15,577,843	6,543,081
Difference	32,776	1,942

Source: SCAG 2035 RTP Baseline Scenario

Caltrans Response #14 Continued:

C4

A. Comment noted. Thank you for your comment. The project would indirectly support trips to and from LAX.

Caltrans Response #14 Continued:

Page: 78

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 7:14:35 AM
What measures will Caltrans take to avoid graffiti during construction? Will it extend it's policy of removal of 1 day for offensive/1 week for all other to the contractor? What enforcement measures will be in place?

A. Caltrans utilizes context sensitive solutions for its landscaping and best management practices for maintenance to prevent and promptly clean up graffiti within its facilities. Project management personnel will request that the contractor will uphold Caltrans' graffiti removal policy of 1 day for offensive/1 week for all other graffiti.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 7:27:08 AM

The storm water pollution prevention plan is prepared by the contractor and reviewed by CalTrans. Where will it be available for public review and comment before approval?

A. No, the SWPPP is reviewed and approved by Caltrans without public review.

Please contact Headquarters Storm Water Program Implementation Office Chief Joyce Brenner at 916-653-2512 or joyce_brenner@dot.ca.gov for additional information on the Construction General Permit implementation such as “results be documented and made available for public consumption.”

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 7:28:31 AM

Will this project utilize at on-site treatment system? What tests of ground water quality will be implemented and how will the results be published for public consumption?

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/28/2010 7:33:25 AM

The EA indicates that this project requires a Storm Water Management Plan and that best practices will be used. Who is responsible for enforcement and reporting? Where will these results be documented and made available for public consumption?

Caltrans Response #14 Continued:

A. On site treatment systems will be examined further in the design phase of the project.

Please refer to Los Angeles Regional Water Quality Control Board, Region 4 requirements regarding on-site treatment system and ground water quality tests or visit the following web address:
http://www.waterboards.ca.gov/losangeles/water_issues/programs/401_water_quality_certification/index.shtml .

B. Caltrans is responsible for the SWMP which has been prepared based on NPDES permit requirements. The SWMP is a public document.

Please refer to Los Angeles Regional Water Quality Control Board, Region 4 requirements regarding a Storm Water Management Plan and best management practices to be implemented or visit the following web address:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/gen_caltrans.shtml .

CHAPTER 2 AFFECTED ENVIRONMENTAL, POTENTIAL IMPACTS AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

elevation varies from approximately 53 feet to approximately 68 feet. There are no known natural resources that will be affected by this project.

Seismicity. Maximum Credible Earthquake (MCE) is typically defined as the maximum earthquake predicted to affect a given location based on the known lengths of the active faults in the vicinity. Based on several memorandums prepared by Caltrans Geotechnical Services, and Caltrans' 2007 draft Los Angeles Area Seismic Hazard Map, the Maximum Credible Earthquake (MCE) along the Newport-Inglewood Fault System, located approximately 0.8 miles northeast of the project, is 7.0 Magnitude (M_w).

Also, using the 2007 draft Los Angeles Area Seismic Hazard Map, the Maximum Credible Earthquake (MCE) along the Charnock Fault, located approximately 0.5 miles southwest of the project site, is 6.5 M_w .

Liquefaction. Liquefaction has not been documented within the limits of this project during the last two major earthquakes in Southern California (1971 San Fernando - $M_w = 6.62$ and the 1994 Northridge - $M_w = 6.7$). In addition, based on a regional study conducted by the U.S. Geological Survey (1985), the relative liquefaction susceptibility along this project is considered to be very low.

Potential Impacts

Potential for Impacts Related to project's susceptibility to erosion and geologic hazards such as earthquakes and liquefaction. Based on several memorandums prepared by Caltrans Geotechnical Services, and Caltrans' 2007 draft Los Angeles Area Seismic Hazard Map, the Maximum Credible Earthquake (MCE) along the Newport-Inglewood Fault System is 7.0 and along the Charnock Fault is 6.5. There will be an insubstantial increase in the existing rate of soil erosion as a result of this project due to grading and after the new fill slopes have been filled or hydroseeded. The increase in the number of impervious areas nor greater downstream effects due to increase in water flow due to this project will not be increased substantially.

Potential for Exposure of Workers to Hazards During Construction. There are currently no special considerations of provisions recommended as a result of this project and geologic conditions in the area. Workers, nonetheless, are subject to implementation and practice of general safety precautions within construction zones.

Potential for Impacts to Natural Geologic Landmarks and Landforms. As part of the scoping and environmental analysis conducted for the project, potential impacts to natural geologic landmarks and landforms were considered, but no adverse impacts were identified. Consequently, there is no further discussion regarding these issues in this section.

Avoidance, Minimization and/or Mitigation Measures

Impacts of a geotechnical nature are negligible and no mitigation measures other than standard engineering design and practices are recommended. No significant settlement is expected to occur in the proposed fill foundations for the realigned ramps. No unusual treatment or special construction methods will be required. There are no known natural resources that will be affected by this project. Preservation of existing vegetation (reduce clearing and grubbing, minimize disturbed areas to the extent possible) will be conducted. If applicable to this project, flatter slopes, slope rounding, benches, and terraces for slopes and hard surfaces along the ground will be utilized. Channel erosion control measures, paved/lined drainage devices and facilities, and vegetated surfaces and other planting strategies will be considered.

Caltrans Response #14 Continued:

A. Comment noted. Thank you for your comment.

B. Comment noted. Thank you for your comment.

Caltrans Response #14 Continued:

Page: 94

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:16:20 AM

Table 38 lists pollutant air quality measures. CARB and AQMD have recently identified the impacts of ultra fine particles (PM <.01). Were any studies run for these particle sizes? What were the results?

A. Several researches are underway by CARB and AQMD to study and refine health impacts as well as measurement and analytical methodologies for ultrafine particles. Table 20 in the Draft IS/EA, however, provides attainment designations by EPA of criteria pollutants for the South Coast Air Basin in which the proposed project is located. At this time, the EPA has not developed a health-based NAAQS for ultrafine particles; and the Draft IS/EA does not provide an analysis of ultrafine particles.

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Number: 1 Author: Denny Portable 4-08 Subject: Highlight Date: 1/31/2010 2:19:11 AM

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:23:54 AM

With regard to PM2.5 if measurements were not taken at the LA-Westchester Parkway station between 2005 and 2007 how can the statement be made that annual PM2.5 concentrations were not exceeded?

Number: 3 Author: Denny Portable 4-08 Subject: Highlight Date: 1/31/2010 2:20:20 AM

Number: 4 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:25:23 AM

Several studies by John Froines at UCLA were done around LAX on ultra fine particles as well as pollution apportionment studies by LAWA. Were these tests reviewed? What were the results?

Number: 5 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:28:09 AM

Since the impact areas according to AQMD studies are within a mile for PM0.1 particles why would monitoring at LA-Westchester Parkway be considered relevant?

Caltrans Response #14 Continued:

B. The paragraph is revised consistently to the Air Quality Report as following: The annual average PM_{2.5} concentrations between 2005 and 2007 were not measured at the Los Angeles-Westchester Parkway monitoring station because this station does not monitor PM_{2.5}. Existing concentrations of PM_{2.5}, therefore, have been analyzed based on monitoring data from another monitoring station – North Long Beach monitoring station. The 2006 NAAQS for 24-hour PM_{2.5} of 35 µg/m³ was exceeded at the North Long Beach monitoring station between 2005 and 2007. However, the NAAQS for annual average PM_{2.5} was exceeded only in 2005.

D. See Response Number 36. The EPA is the federal authority to establish standards for pollutants based on health impacts while CARB is its state counterpart. EPA and CARB, as part of their development for standards, evaluate applicable and appropriate studies and research papers. A federal or state standard for ultrafine particles has not yet been established; and the Draft IS/EA has not evaluated ultrafine particles effects by the proposed project as researches are currently underway on the subject.

E. See Response Numbers 36 and 38. The CARB established statewide ambient air toxic monitoring to facilitate the identification and control of toxic air contaminants in California, pursuant to 1983 amendments to the Health and Safety Code (AB 1807, Tanner). The stations within the state and local air monitoring network house monitoring instruments that measure ambient levels of gaseous and particulate (solid and liquid aerosol) air pollutants. However, no stations in the current monitoring network provide monitoring of ultrafine particles as the methodologies are still being refined by CARB and AQMD.

Caltrans Response #14 Continued:

Page: 103

Number: 1	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/31/2010 2:30:25 AM
If the nearest location for PM2.5 particle monitoring is North Long Beach, how is this related to the subject area along the I-405?			
Number: 2	Author: Denny Portable 4-08	Subject: Sticky Note	Date: 1/31/2010 2:33:51 AM
What are the "Two schools, two public parks, a university, and a church...located within a quarter-mile of the project impact area..?"			

A. Reference is made to a joint EPA/FHWA Transportation Conformity Guidance for Qualitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas dated March 2006. The Guidance provides a method of comparison to another location with similar characteristics, which involves reviewing existing highway or transit facilities that were constructed in the past and built in locations similar to the proposed project and, whenever possible, near an air quality monitor (a surrogate) to allow a comparison of PM_{2.5} or PM₁₀ air quality concentrations.

B. The following public facilities are located within a quarter-mile of the project impact area: Higher Learning Academy at 534 West Arbor Vitae Street, Inglewood Christian School at 214 East Hillcrest Boulevard, Ashwood Park, Siminski Park, University of West Los Angeles at 9800 South La Cienega Boulevard, and Family Christian Cathedral at 645 West Arbor Vitae Street.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:42:22 AM

Current Inglewood traffic is driven to the Prairie on-ramps for the I-105 freeway which are under utilized. How many trips are assumed to be added by the addition of a new Arbor Vitae on-ramp for the south direction? Will air quality suffer from reduced speeds at the on-ramp/main traffic lane interchange due to increased cars weaving in both directions to get on the I-405 or over to the I-105 over pass on-ramp?

A. The identified preferred alternative will result in no changes to the traffic and air quality effects.

Page: 110

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:47:32 AM

What levels of diesel emissions are expected due to increased cargo activity at LAX? Although traffic is down at LAX compared to 2001 it is projected to have substantial increases by 2020 and beyond. Have these impacts been considered due to slow down of main-line traffic to accommodate the new on-ramp?

Caltrans Response #14 Continued:

A. Traffic forecast is based on the growth projected for the region as adopted in the latest Regional Transportation Plan. The Preferred Alternative, the No-Build Alternative, will not result in impacts to traffic or cargo activity as there will not be any changes to the current geometrics. In addition, as noted in Section 2.2.6 of the Draft IS/EA, emissions of MSATs, including the diesel particulate matters, will likely be lower than present levels in future years as a result of EPA's and California's control programs that are projected to reduce MSAT emissions by at least 57 to 87 percent from 2000 to 2020.

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:51:16 AM
 The scan of figure 2-18 of PM emission levels is too low a resolution to read the detail numbers and dates. On what basis is the projected levels expected to go down in general if the number of trucks increases due to both cargo at LAX and deliveries within the project impact areas?

Caltrans Response #14 Continued:

A. Emissions of MSATs are from vehicles and are controlled by the EPA and CARB; so they are outside the control of this project. The MSAT analysis concludes that the overall emissions of MSATs will likely be lower in the future than present level regardless of which alternative is implemented. These reductions are principally due to improved technologies controlling and/or eliminating these emissions, such as better emissions controls, cleaner burning fuels, and increased percentages of low- and zero-emission vehicles in the fleet.

The reductions illustrated on Figure 2-18 are based on measures recommended by CARB that includes those addressing on-road vehicles, off-road equipment and vehicles, and stationary and portable engines. These measures include the EPA's heavy-duty truck standards and low-sulfur fuel limits.

Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 1/31/2010 2:55:01 AM

Under exposure levels and health effects the report states that precision is inadequate to predict impacts. However, given that the highway department regularly makes predictions on the numbers of productivity hours lost by commute time delays this could give a measure of the exposure to toxics. Has this approach been considered? Were there any estimates generated and what are they?

A. Traffic delay is one of the parameters to be considered in the process of assessing exposure risks. The Draft IS/EA, however, does not provide a health risk assessment due to the uncertainty and unavailable information noted. See Response Number 16.

CHAPTER 2 - AFFECTED ENVIRONMENTAL, POTENTIAL IMPACTS AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

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.

Caltrans' *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 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, the absolute noise level, build versus existing noise, environmental impacts of abatement, public and local agencies input, newly constructed development versus development pre-dating 1978 and the cost per benefited residence.

Study Methods and Procedures

Selection of Receivers and Measurement Sites. Noise sensitive receivers in the project area that are subject to traffic noise impacts from freeway-generated noise were identified. Noise sensitive areas typically include residences, schools, libraries, churches and temples, hospitals, recreation and sport areas, playgrounds, hotels, motels and parks.

For this project, Caltrans Noise and Vibration Investigation Branch personnel performed a field survey of the entire area within the limits of the project. The survey included visiting the project sites in order to identify land uses within the project limits and to select the noise measurement sites. The entire area within the project limits was acoustically represented by 12 noise measurement site locations and modeled at one location. The noise measurement sites were selected taking into consideration the following general site requirements:

- 1) Sites were acoustically representative of areas and conditions of interest. They were located at areas of human use.
- 2) Sites were clear of major obstructions between source and receiver. Microphone positions were more than 9 feet away from reflecting surfaces.
- 3) 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.
- 4) Sites were not exposed to prevailing meteorological conditions that are beyond the constraints discussed in the Technical Noise Supplement.

The Interstate 405 Corridor already exceeds the Noise Abatement Criteria (NAC), so no noise readings or any long-term noise modeling will be conducted outside of the project study area.

Measurement of Existing Noise Levels. The existing noise environment in the project area was determined by performing short-term (10-minute) and long-term (24-hour) noise monitoring. 24-hour readings were taken at locations representative of residential area within an interchange in order to determine the noisiest hour. Sound level meters were placed at two representative sites (See Table 44 Traffic Noise Measurement and Modeling Results) and were left to run continuously monitoring and recording noise levels for a 24-hour period. The short-term noise levels were recorded within each 24-hour noise monitoring for that particular area. The noise level data collected was then analyzed and adjusted using the 24-hour noise readings to determine the noisiest hour.

Additionally, two community background noise readings were taken within the project limits. Background noise is the total of all noise generated within the community and is measured away from the freeway where freeway traffic noise does not contribute to the total noise level. Background noise levels are typically measured to determine the feasibility (noise reducibility of 5 dBA) of noise abatement and to insure that noise reduction goals can be achieved. The

Caltrans Response #14 Continued:

A. Comment noted. Thank you for your comment.

<p>Page: 121</p> <hr/> <p>Number: 1 Author: Denny Portable 4-08 Subject: Highlight Date: 2/1/2010 6:17:17 AM</p> <hr/> <p>Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 2/1/2010 6:31:07 AM</p> <p>Based on the temp quoted the noise measurements were done in spring or summer even though Table 44 indicates March 06 readings. Were measurements done in late fall or winter during the rainy/fog season when noise is held closer to the ground? Wyle Labs has models to project how far the noise projected from the flyover proposed highway under various atmospheric conditions. If modeling was not used, why not? Was it used for each of the alternatives or only existing condition? What were the results? What were the loudest hours during the testing? What was the maximum value seen and the duration of an "event"?</p>	<p style="text-align: right;">C4</p> <p>Caltrans Response #14 Continued:</p> <p>A. Comment noted. Thank you for your comment.</p> <p>B. Traffic noise measurements were performed from March 3, 2006 to March 13, 2006. All traffic noise measurements are conducted when freeway traffic is free-flowing. Traffic counts for each vehicle type are taken (autos, medium and heavy trucks). In addition, two long-term 24-hour readings were performed on 3/8/06 and 3/13/06. The long-term readings were used to adjust all short-term reading for noisiest hour conditions.</p> <p>As per traffic noise analysis guidelines established by the FHWA and Caltrans, all traffic noise readings are done during acceptable atmospheric conditions (not raining or windy).</p> <p>The traffic noise study addresses existing and projected freeway traffic noise. Traffic noise study includes analysis for all proposed alternatives, as well as for existing noise conditions, including elevated roadways. Noise study results have been included in the noise study report.</p> <p>Long-term traffic noise readings show the loudest traffic noise to occur between the hours of 3:00 PM and 8:00 PM. The maximum-recorded hourly average noise values were 69.8 dBA and 69.5 dBA during the March 3, 2006 and March 13, 2006 long-term readings, respectively.</p>
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Caltrans Response #14 Continued:

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Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 2/1/2010 6:36:13 AM
Hawks have also been observed in this area along the freeway.

A. Many urbanized species can be observed along the freeway. If possible, the construction of the proposed project will be done outside the bird nesting season, February 15 to September 1. If construction must be conducted during the nesting season, a pre-construction survey will be conducted by a qualified biologist to determine if mitigation measures are needed.

Oak Woodland Replacement. California is losing its oak woodlands at an alarming rate to land development and conversion to agriculture. Since 1945 over one million acres of oak woodland has been lost in California. A 2001 estimate shows the 30,000 acres of oaks per year are lost statewide, compared to only 60,000 acres for an entire decade in the mid-1980's to mid-1990's. Southern oak woodlands once covered much of the foothills and plains of the Southern California ecoregion and the Los Angeles Basin was once noted for their vast savannas of coast live oak, and valley oak. Today, more than 85 percent of coastal sage scrub communities, which include oak woodlands, have been lost to urban and agricultural development. The vast majority of oak savannas in the Southern California region have been destroyed.

As noted on the prior page, no oak trees within the project study area will be removed as part of the I-405/Arbor Vitae New South Half Interchange Project. However, should the removal of oak trees be necessary due to the 405/101 Interchange Project, the loss will be mitigated offsite through replacement planting. Based on the total amount of oak trees impacted and available on-site locations, favorable areas within the right of way will be selected by the District Biologist and Landscape Architect. Any required replacement beyond the space available in the right of way will be planted off-site in coordination with an agency or organization that has yet to be determined.

California Senate Resolution No. 17-Relative to Oaks, adopted by the California Legislature, requests that state agencies assess their impacts to oak woodlands containing blue, Engelman, valley or coast live oak species and to preserve and protect to the maximum extent feasible or provide replacement plantings when these species are removed. By offsetting the impacts to oak woodlands as described above, Caltrans will also conform to the spirit of Senate Concurrent Resolution No. 17.

2.3.2 WETLANDS AND OTHER WATERS

General Regulatory Setting. Wetlands and other waters are protected under a number of laws and regulations. At the federal level, the Clean Water Act (33 U.S.C. 1344) is the primary law regulating wetlands and waters. The Clean Water Act regulates the discharge of dredged or fill material into waters of the United States, including wetlands. Waters of the United States include navigable waters, interstate waters, territorial seas and other waters that may be used in interstate or foreign commerce. To classify wetlands for the purposes of the Clean Water Act, a three-parameter approach is used that includes the presence of hydrophytic (water loving) vegetation, wetland hydrology, and hydric soils (soils subject to saturation/inundation). All three parameters must be present, under normal circumstances, for an area to be designated as a jurisdictional wetland under the Clean Water Act.

Section 404 of the Clean Water Act establishes a regulatory program that provides that no discharge of dredged or fill material can be permitted if a practicable alternative exists that is less damaging to the aquatic environment or if the nation's waters would be significantly degraded. The Section 404 permit program is run by the U.S. Army Corps of Engineers (USACE) with oversight by the Environmental Protection Agency (EPA).

The Executive Order for the Protection of Wetlands (E.O. 11990) also regulates the activities of federal agencies in regards to wetlands. Essentially, this executive order states that a federal agency, such as the Federal Highway Administration, cannot undertake or provide assistance for new construction located in wetlands unless the head of the agency finds: 1) that there is no practicable alternative to the construction and 2) the proposed project includes all practicable measures to minimize harm.

At the state level, wetlands and waters are regulated primarily by the California Department of Fish and Game (CDFG) and the Regional Water Quality Control Boards (RWQCBs). In certain circumstances, the Coastal Commission (or Bay Conservation and Development Commission) may also be involved. Sections 1600-1607 of the Fish and Game Code require any agency that proposes a project that will substantially divert or obstruct the natural flow of or substantially

Caltrans Response #14 Continued:

A. Comment noted. Thank you for your comment.

CHAPTER 2 - AFFECTED ENVIRONMENTAL, POTENTIAL IMPACTS AND AVOIDANCE, MINIMIZATION AND/OR MITIGATION MEASURES

Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, nor mitigation measures are necessary in regards to wetlands since no wetlands will be impacted by this project.

Wetlands Only Practicable Finding

Executive Order 11990 mandates that an agency such as Caltrans avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands, and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. No wetlands will be affected by Alternative 2, the project's only build alternative. Therefore, no mitigation will be provided to mitigate impacts to wetlands. No coordination will be necessary with the US Army Corps of Engineers, California Department of Fish and Game, and Regional Water Quality Control Board during the permitting phase of the project because there will be no net loss of wetlands.

Table 46. Wetlands Only Practicable Finding Pursuant to Executive Order 11990

Balancing Factors	No Build Alternative 1	Alternative 2	Alternative with Advantage
Acres of State and Federal Wetland Destruction	ZERO Acres	ZERO Acres	Neither
Encroachment Upon the Floodplain and Flood Control Basin	ZERO Encroachment	no significant encroachment	No Build Alternative 1
Project Purpose and Need	FAILS to meet the Project's Purpose and Need	BEST meets the Project Purpose and Need	Alternative 2
Biological Impacts	ZERO Encroachment	no significant biological impacts	No Build Alternative 1
Encroachment Upon Wetlands	ZERO Encroachment	ZERO Encroachment	Neither
Least Impact to Section 4(f) Resources	ZERO Impacts to Section 4(f) Resources	ZERO Impacts to Section 4(f) Resources	Neither
Project Impact Footprint	ZERO Impact Footprint	37.2 Acres	No Build Alternative 1
Cost (Socioeconomic Considerations)	Not a factor: \$0	\$16.8 million for Right of Way/Relocation Costs, \$278 million total cost	No Build Alternative 1

2.3.3 PLANT SPECIES

Regulatory Setting. The U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) share regulatory responsibility for the protection of special-status plant species. "Special-status" species are selected for protection because they are rare and/or subject to population and habitat declines. Special status is a general term for species that are afforded varying levels of regulatory protection. The highest level of protection is given to threatened and endangered species; there are species that are formally listed or proposed for listing as endangered or threatened under the Federal Endangered Species Act (FESA) and/or the California Endangered Species Act (CESA). Also, please refer to the Threatened and Endangered Species section in this document for additional information regarding these species. No threatened or endangered plant species were found within the project study area.

Caltrans Response #14 Continued:

A. Comment noted. Thank you for your comment.

Caltrans Response #14 Continued:

Page: 137

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 2/1/2010 6:43:14 AM
Where can we obtain a copy of the July 2008 noise study for review?

A. The July 10, 2008 Traffic Noise Study Report for this project is available in Caltrans, District 7 at 100 South Main Street, MS 16A, 12th Floor Los Angeles, CA 90012. Please call at Jin Lee at 213-897-3312 or email him at jin_s_lee@dot.ca.gov to obtain a copy.

Page: 138

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 2/1/2010 6:46:30 AM

As the freeway traffic backs up on the main traffic lanes overflow tends to use the collector lanes. Will this lane be closed for the majority of the three years or only intermittently? How far back will the closure be noticed to alert drivers?

Caltrans Response #14 Continued:

A. As originally intended, the collector lanes would remain open during construction. In general, closure notifications during construction would follow standard Caltrans procedures.

Caltrans Response #14 Continued:

Page: 150

Number: 1 Author: Denny Portable 4-08 Subject: Highlight Date: 2/1/2010 6:49:53 AM

Number: 2 Author: Denny Portable 4-08 Subject: Sticky Note Date: 2/1/2010 6:51:32 AM

This chart shows that if the traffic fixes of Alternative 2 cause increase delays on the main lanes due to increased movement the slower traffic will emit greater CO2

B. Alternative 2 is proposed to reduce congestion at the neighboring interchanges. Based on a recent traffic analyses, the Alternative 2 would result in minor benefits to the collector/distributor system and minor impacts to the mainline. However, the overall change to the freeway system would be negligible. Based on the analyses, the implementation of Alternative 2 will not likely result in any changes to the emissions of CO₂ compared to the No-Build, or Preferred Alternative.

Caltrans Response #14 Continued:

Page: 156

Number: 1 Author: Denny Portable 4-08 Subject: Sticky Note Date: 2/1/2010 6:55:17 AM
This school site is now used by LAWA/TSA.

A. Comment noted. In 1994, the site was inhabited by Westchester Neighborhood School.

Denny Schneider

From: MOLINA, MICHAEL [MMOLINA2@lawa.org]
Sent: Monday, January 25, 2010 12:25 PM
To: Denny Schneider
Subject: RE: Sign on I405

Denny,
Thanks for your inquiry relative to the apparent new posting of a sign along the southbound 405 Freeway near Jefferson indicating "LAX Next 5 Exits." I recognize how hard we worked collectively to have a similar sign removed in the past.

I spoke with Michael Feldman, our deputy executive director for planning and facilities, who inquired among his staff. LAX staff was unaware that the sign was re-installed and therefore had no part in its reappearance. We support all efforts in removing the sign once again in support of the wishes of our local community.

Please let us know if we can be of further assistance in this matter.

Mike Molina
Senior Director of External Affairs
Los Angeles World Airports
(424) 646-6060
mikemolina@lawa.org

Caltrans Response #14 Continued:

A. Comment noted. Thank you for your comment.

 <p>Danna Cope <dannacope@gmail.com> 02/03/2010 04:54 PM</p> <p>To: eduardo_aguilar@dot.ca.gov cc bcc</p> <p>Subject: CalTrans EA 49160 New South Half I-405 Arbor Vitae Interchange</p> <p>DANNA COPE 8219 Reading Avenue Westchester, CA 90045</p> <p>CA Department of Transportation, District 7 Attn: Ronald Kosinski, Deputy District Director 100 Main Street, MS 16A Los Angeles, CA 90012</p> <p>Re: CalTrans EA 49160 New South Half I-405 Arbor Vitae Interchange</p> <p>Dear Mr. Kosinski:</p> <p>The proposal in the EA would not ease traffic in and into the Westchester area. The I-405 main lane traffic flows are already poor within the project area during most hours of the day; this proposal will not improve that condition.</p> <p>Although the subject EA focuses on local traffic improvement as the project's primary purpose, LAX traffic is also mentioned in several portions of the EA. The CalTrans traffic analyses provided show an unacceptable increase in projected traffic on Century Boulevard west of Airport Boulevard entering the LAX Central Terminal Area.</p> <p>Improvement of the traffic at the north-bound Manchester off-ramp is one of the project's alternative goals. However, despite the poor level of service experienced, the EA traffic capacity tables show that this and the other existing off-ramps in the project study area have adequate theoretical traffic handling capacity to meet projected needs. Rather than adding more off-ramps, alternative corrections for the poor performance should be researched and implemented. The Manchester northbound freeway exit from the access road paralleling the main lanes has a single lane egress toward the Manchester intersection. This causes a bottle neck backing up traffic during the most congested times. Installation of a second, optional exit lane by removing the island bump out as well as improved Manchester signalization would be less expensive.</p>	<p style="text-align: right;">C5</p> <p>Caltrans Response #15:</p> <p>A. A thorough traffic analysis has been performed by CH2M Hill that includes the impacts that the proposed but rejected half interchange would have on Arbor Vitae Street west and east of the Project Study Area and on the surrounding communities. The Traffic Analysis illustrates the improvements from this proposed but rejected project are projected to induce additional commuters. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to the table on pages 4 through 18 of your letter. Data is provided for 2008 and 2035.</p> <p>B. According to the traffic analysis, the project will not improve 405 mainline speeds but it will improve the Level of Services at Manchester Avenue and Century Boulevard Interchanges. Several errors were made in the Draft Environmental Document in saying that the proposed but rejected project "provide direct access to Los Angeles International Airport." This is not the case as the project is not adjacent to the entrance of the airport for arriving and departing passengers. The proposed project would provide access to the Hollywood Park Casino and Redevelopment Project, the University of West Los Angeles, Centinela Hospital, and the Forum.</p> <p>C. It also notes the improvement in traffic along Century Boulevard and Manchester Avenue and their interchanges on Interstate 405. The Arbor Vitae Street Southbound Onramp will reduce the number of vehicles traveling the Century Boulevard and Manchester Avenue intersections to reduce stop and go traffic conditions.</p>
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The new southbound Arbor Vitae fly-over on-ramp merges with the existing Manchester/Olive entrance to the freeway in an area which is already complicated by proximity to the I-105 connections. The existing on-ramp experiences no significant delays, but entering the main freeway lanes during rush hour is difficult. Adding another lane may be counterproductive on the I-405 as multidirectional merging is exacerbated.

For those east of the I-405 wishing direct access to the I-105 superior access is already provided at Prairie Boulevard rather than forcing more traffic into the interchange.

I urge CalTrans to develop a project that will help main lane freeway traffic flow in the region with a design to reduce the complications of merging so that accidents are reduced. Traffic gridlock from a past accident on the San Diego Freeway (I-405) resulted in as many as 30,000 people missing flights.

There are less expensive methods that should be implemented to achieve traffic mitigation. This EA should not be approved.

Sincerely,

Danna Cope
 8219 Reading Ave
 Westchester, CA 90045
dannacope@gmail.com
 (310) 641-2503

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 Danna Cope
dannacope@gmail.com

Caltrans Response #15 Continued:

A. The Arbor Vitae Street Southbound Onramp will reduce the number of vehicles traveling the long Manchester Avenue southbound onramp. This proposed but rejected project would not have improved congestion along the Interstate 405 Mainline.

B. Comment noted. Thank you for your comment.

C. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for the answers to your questions.

D. Comment noted. Thank you for your comment.

THE DAILY BREEZE
 ← LETTERS TO THE EDITOR / PLEASE PUBLISH

— CALTRANS * \$87,000,000 BUDGET —

- CALTRANS IS GETTING READY TO SPEND THE ABOUT ABOVE TO WIDEN THE BRIDGE ON ARBOR VITAE ST, IN INGLEWOOD, THAT CROSSES THE 405 FREEWAY AND ERECT A SOUTHBOUND ON RAMP, ADJACENT TO THE BRIDGE, THAT WILL CONNECT TO THE SOUTH BOUND 405 FREEWAY. ALSO A NORTH BOUND OFF RAMP WILL CONNECT TO THE BRIDGE.
- LA CIENEGA BLVD RUNS NORTH AND SOUTH, PARALLEL, RIGHT NEXT TO THE 405 FREEWAY, AT THE BRIDGE.
- * ~~THERE IS~~
- APPROX. 1/2 MILE NORTH OF ARBOR VITAE

Caltrans Response #16:

A. Mr. Houser describes the project in his own words explaining the Arbor Vitae southbound 405 onramp and the northbound Interstate 405 Freeway offramp to Arbor Vitae Street. The statement is correct.

The purpose of the project is to relieve congestion at the interchanges adjacent to Arbor Vitae Street on Interstate 405. While the project is considered expense under a Benefit-Cost Analysis, it did have the support of many in the community as overall community access to and from the freeway system would be improved.

B. "Money \$87M --> We are broke" - The proposed but rejected project was programmed with \$52 million. It required an additional \$37 million in funding to be constructed.

<p style="text-align: right;">2&2</p> <p>STREET, ON LACIENEGA BLVD THERE IS A SOUTH BOUND TWO-LANE ON RAMP TO THE 405 FREEWAY AND APPROX. 3/10 OF A MILE, SOUTH OF ARBOR VITAE STREET, ON LACIENEGA BLVD THERE IS A SOUTH BOUND TWO LANE ON RAMP TO THE 405 FREEWAY.</p> <p>— • WHY IN THE WORLD WOULD CALTRANS SPEND * \$7,000,000 FOR ONE NEW SOUTH BOUND ON RAMP WHEN 3/10 MILES SOUTH AND 1/2 MILES NORTH THERE ARE TWO EXISTING RAMPS.</p> <p>• WHAT A WASTE OF MONEY !!!</p> <p>• DOES NOBENT CALTRANS KNOW THAT OUR COUNTRY IS BROKE AND AND OUR STATE IS ALSO !!!</p> <p style="text-align: right;">1-310-671-4321 Noel W. Houser NOEL W. HOUSER</p>	<p style="text-align: right;">C6</p> <p>Caltrans Response #16 Continued:</p> <p>A. Mr. Houser describes the project in his own words explaining the Arbor Vitae southbound 405 onramp and the northbound Interstate 405 Freeway offramp to Arbor Vitae Street. The statement is correct.</p> <p>B. Comment noted. Thank you for your comment.</p> <p>C. Caltrans does realize that the country and state are going through severe financial difficulties.</p>
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Formulario de Comentarios

El proceso de la audiencia es para darle a agencias y al público una oportunidad de proveerle a Caltrans sus comentarios sobre la Información dentro de la Evaluación/Estudio Inicial Borrador (EA/IS – por sus siglas en inglés). Por favor someta sus comentarios sobre el proyecto propuesto, sus alternativas, medidas de mitigación, y cualquier otra información que nos ayude a preparar un EA/IS Final amplio para las propuestas mejoras a la autopista Interestatal 405 en la Calle Arbor Vitae.

Por favor escriba claramente.

Fecha: 1-18-2010

Nombre Completo: Clara Gonzalez

Organización: Quetta

Domicilio (para ser agregado a la lista para recibir información): _____

Ciudad, Estado, Código Postal: _____

Comentarios: seria buena idea para evitar el trafico

(Espacio al reverso para seguir sus comentarios)

Caltrans Response #17:

P1

A. Comment noted thank you for your comment.
 Comentario anotado gracias por tu comentario.



Comment Sheet

The hearing process is intended to allow agencies and the public to provide feedback to Caltrans on the information provided in the Draft Environmental Assessment/Initial Study (Draft EA/IS). Please submit your comments on the proposed project, alternatives, mitigation measures, and any other information that may help us prepare a comprehensive Final EA/IS for the proposed improvements to the Interstate 405 at Arbor Vitae Street.

Please print clearly.

Date: 1/19/2010

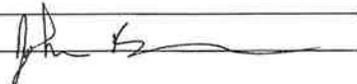
Name (First and Last): John Bowman

Organization: Inglewood resident

Address (to be added to project mailing list): _____

City, State and Zip Code: Inglewood CA 90302

Comments: This project is a waste of money. There is already 1 freeway onramp/offramp per mile in the area. Use the money on improving public transportation, mass transit, ~~etc~~ so we can cut our labor's transportation cost so we can compete with the emerging economies, namely, the Chinese.

Thank you 

(Space for comments continued on reverse)

Caltrans Response #18:

A. The Department cannot obligate the available funds to mass transit projects. The Los Angeles Metropolitan Transportation Authority (Metro or MTA) has the jurisdiction on all mass transit projects and they have established a ranking system to prioritize projects based on their own strict guidelines and criteria.

Speaker Card

I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name Jerry McAlvey I would like to speak.
 Address _____
 Phone 310-663-1199
 E-mail mcAlv4U@yahoo.com do not want to speak, please read my comment.

My question/comment is:

How will the 6' widening of bridge on north side affect property on Arbor Vitae between 405 & Ash?

Why didn't they put south on ramp on west side of 405 to reduce congestion?

~~As currently proposed, there are~~

Caltrans Response #19:

A. The proposed but rejected alternative would have required the takings of 3 properties on Arbor Vitae Street: 670, 700, and 704 Arbor Vitae Street. As currently proposed, the widening of the bridge structure on the north side of the Arbor Vitae Street overpass will not affect properties on the north side of Arbor Vitae Street between Interstate 405 and Ash Avenue.

As originally proposed, there would have been no right of way acquisition on the north side of Arbor Vitae Street between Interstate 405 and Ash Avenue. Should the project move forward in the future, the need for right of way acquisition at this location will be re-evaluated.

As originally intended, the Arbor Vitae Street overcrossing would have been widened (approximately 6 feet on each side) to satisfy mandatory design standards related to lane widths and shoulder widths.

B. There would be too many intersections within a short distance of Interstate 405's mainline. The proposed but rejected alternative was designed to minimize the impact of the project on the adjacent communities of Inglewood and Westchester. Constructing a southbound Interstate 405 onramp on the west side of the freeway would have required additional expense of taking multiple commercial properties.

Due to the constraints of the existing infrastructure, there is insufficient space to fit a new southbound Onramp originating from west of the Interstate 405 freeway.

Speaker Card
 I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name Tina McKinnor
 Address 1 W. Manchester Blvd., Inglewood I would like to speak.
 Phone 310-412-6400
 E-mail Tina.McKinnor@asm.ca.gov I do not want to speak, please read my comment.

My question/comment is:
How is Eminent Domain process coming along?

Caltrans Response #20:

A. We are not conducting the Eminent Domain Process. Before we can get to the Eminent Domain Process, we have to have an FHWA-approved Final Environmental Document for this project.

Speaker Card
 I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name DARRYW HARRIS

Address _____

Phone _____

E-mail DARRYW.HARRIS@OSM.OA.GOV

- I would like to speak.
- I do not want to speak, please read my comment.

My question/comment is:

Is there the possibility of including an ^{additional} alternative why are there only two alternatives presented.

Caltrans Response #21:

A. The proposed but rejected alternative was the only build alternative considered at this time. The project may be reintroduced with local road improvements added in the future.

A number of previously studied alternatives were identified as being not viable for a number of different reasons (environmental impacts, cost, etc.). Should the project move forward in the future, additional alternatives may be examined.

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Speaker Card

I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name CLAYDNE BURT

Address 110 N OAK ST

Phone 310-670-8067

E-mail /

I would like to speak.

I do not want to speak, please read my comment.

My question/comment is:

Ⓐ TRAFFIC "BOTTLENECK" northbound on the 405 is most intense north of Florence Avenue; southbound begins (usually) at Ardmore apt. The proposed "crescent corridor" plan will IMPACT City of Inwood at Florence Avenue. The additional needs Clarification.

Caltrans Response #22:

A. Congestion on Florence Avenue and Manchester Avenue would have improved with the proposed but rejected alternative since it would have offered an alternative access path to Interstate 405. See Section 2.1.6 Traffic and Transportation/Bicycle and Pedestrian Facilities of the Final Environmental Document. Data is provided for 2008 and 2035.

The proposed but rejected project would not have substantially improved the flow of traffic along the mainline of Interstate 405 itself.

Archer Vialle construction and completion will reside by wood in addition.

Congestion on Florence Manchester will improve by offering an alternate access to the I-405.

(A) This project will not substantially ~~not~~ improve the flow of traffic along the I-405 ~~center~~ facility itself.

Caltrans Response #22 Continued:

A. Congestion on Florence Avenue and Manchester Avenue would have improved with the proposed but rejected alternative since it would have offered an alternative access path to Interstate 405. Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document. Data is provided for 2008 and 2035.

The proposed but rejected project would not have substantially improved the flow of traffic along the mainline of Interstate 405 itself.

Speaker Card
I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name David Coffin I would like to speak.
Address 5430 TRUKIN
Phone 310 383 8337 I do not want to speak, please read my comment.
E-mail _____

My question/comment is:

Caltrans Response #23:

A. No comment on speaker card.

Speaker Card
I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name Anthony Coppa
Address ~~115 Calle De Sol~~ I would like to speak.
Phone 492 W Arbor Vitae
E-mail 949 4971700 I do not want to speak, please read my comment.

My question/comment is:
The Widening of Arbor Vitae E & W

Caltrans Response #24:

A. Comment noted. Thank you for your comment.

- Are we widening Arbor Vitae?
- How far east are you
- What are you solving?

Caltrans Response #24 Continued:

A. No, the vehicle lanes along Arbor Vitae Street were not going to be widened by this proposed but rejected project.

B. The extent of the proposed but rejected project would have extended east on Arbor Vitae Street through South Ash Avenue.

C. The project will not improve 405 mainline speeds but it will improve the Level of Services at Manchester Avenue and Century Boulevard Interchanges. It would be better for Level of Service (LOS) if additional lanes were added to Arbor Vitae Street for some but not all of the intersections on Arbor Vitae Street between the 405 and Prairie Avenue if the proposed but rejected project was constructed and the additional traffic by 2035 would result. Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for details.

Speaker Card
I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name NOEL HOWSON
Address 1079 S. TULLOCH I would like to speak.
Phone _____ I do not want to speak, please read my
E-mail _____ comment.

My question/comment is:
GENERAL

Caltrans Response #25:

A. No comment on speaker card.

Speaker Card
I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name Diane Sainbrone I would like to speak.
Address 3640 W. 117th Place
Phone 714-922-1717 I do not want to speak, please read my comment.
E-mail _____

My question/comment is:

Caltrans Response #26:

A. No comment on speaker card.

Speaker Card
I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name KEITH LOCKARD
Address ONE W. MANCHESTER I would like to speak.
Phone 310-412-5383
E-mail KLOCKARD@CITYOFINGLEWOOD.ORG I do not want to speak, please read my comment.

My question/comment is:

Caltrans Response #27:

A. No comment on speaker card.

<p><i>Public Works Department City of Inglewood</i></p> <p><i>→ appreciate coordination w/ Caltrans</i></p> <p><i>→ concern - southeast cor 670 arbor vitae = approved project w/ parking lot for city funded by metro</i></p>	<p style="text-align: right;">S6</p> <p>Caltrans Response #27 Continued:</p> <p>A. Comments and information noted. Thank you for your comments and information. The proposed but rejected project will not interfere with proposal for parking structure at 670 Arbor Vitae Street.</p> <p>As currently proposed, the right of way occupied by the proposed parking lot would be needed to accommodate the proposed half-interchange project. Should this project move forward in the future, replacement/alternative parking will be looked at as part of the project.</p>
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Speaker Card
 I-405 at Arbor Vitae Street New South Half Interchange Project - Public Hearing

To speak during the public hearing or have your comment read aloud, complete this speaker card and hand it to a staff member. Please print clearly. Use the reverse side if necessary.

Name NOEL W. MOUSER AGAINST → III
 Address 1024 SO. TRUENING BLVD I would like to speak.
 Phone 514 482 9070
 E-mail _____ I do not want to speak, please read my comment.

My question/comment is:

1. - MONEY 87,000,000 → WE ARE BROKE
3. - EXITING SOUTH RAMP - OLIVE ST ENTRANCE
2. - EXITOR MEET - TWO DIFFERENT TAKES
4. - EMPTY FIELDS - WHY DON'T YOU SHOW THEM
- ← RED LIGHT - MAKES MORE SMOG / DIRTY AIR

Caltrans Response #28:

- A. The proposed but rejected project was programmed with \$52 million. It required an additional \$37 million in funding to be constructed.
- B. We are not sure what is being commented on in the second paragraph.
- C. We are not sure what is being commented on in the third paragraph.
- D. Empty fields are not shown due to the age of certain mapping/photographs used in the document.
- E. The Draft IS/EA provides local air quality analyses for various pollutants including CO, PM₁₀, PM_{2.5}, and MSAT. Furthermore, the Preferred Alternative, selected as the No-Build Alternative, will not result in any changes to travel patterns; and therefore, will not result in any changes to impacts to sensitive receptors. By reducing congestion, some air quality benefits are expected.

	Public Hearing.txt
1	405 ON THE MOVE
2	ARBOR VITAE STREET
3	PROPOSED NEW HALF INTERCHANGE
4	PUBLIC HEARING
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13	TRANSCRIPT OF PROCEEDINGS
14	Inglewood, California
15	Tuesday, January 19, 2010
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24	Reported by: Nanci L. Grube
25	CSR No. 3446
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1	405 ON THE MOVE
2	ARBOR VITAE STREET
3	PROPOSED NEW HALF INTERCHANGE
	Page 1

4 Public Hearing.txt
5 PUBLIC HEARING

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 TRANSCRIPT OF PROCEEDINGS,
taken at 120 West Regent Street, Inglewood,
California, commencing at 6:25 p.m., Tuesday,
January 19, 2010, before Nanci L. Grube, CSR
No. 3446, pursuant to Notice.

2

1 MS. DE LOZA: Good evening. Thank you for coming.
2 My name is Lillian De Loza, and I'm the facilitator for
3 tonight's public meeting. The purpose of tonight's
4 public hearing is to receive public testimony and to
5 answer questions regarding the proposed project, which
6 is the I-405 Arbor Vitae half interchange project. And
7 submit your comments on the draft environmental

Page 2

Public Hearing.txt
 8 document. We are currently in a 45-day public comment
 9 period, which began on December 21, and it will end on
 10 February 3rd. So comments can be submitted up until
 11 February 3rd.

12 There were some brief handouts at the door.
 13 You should have received a comment card, a public
 14 testimony card, which you will need to submit if you
 15 want to make public testimony tonight, an agenda, a
 16 frequently asked question sheet and also a public
 17 information sheet that provides an overview of the
 18 project. Hopefully, you were able to speak with some of
 19 the project representatives here tonight and answer some
 20 of your questions regarding the project.

21 Very quickly, our public outreach effort to
 22 date started early on. As early as the summer we met
 23 with city staff at both the City of L.A. and the City of
 24 Inglewood regarding this project. As it relates to
 25 noticing for tonight's meeting, there were newspaper ads

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1 placed in L'Opinion, the L.A. Watts Times, the Daily
 2 Breeze, the Argonaut, the L.A. Centennial and Inglewood
 3 Today. And these started running December 21, and this
 4 week another -- last week another round of announcements
 5 regarding this public hearing were published as well in
 6 the same newspapers.

7 We mailed more than 5,000 postcards to
 8 neighboring residents and businesses within a
 9 two-and-a-half mile radius, and we also walked the
 10 affected neighborhood along Ash and Arbor Vitae and
 11 spoke to businesses and residents that were immediately

Public Hearing.txt
12 adjacent to the project perimeters.

13 So tonight we are here to take your comments
14 on the draft document, and as I mentioned, we need to
15 receive a public testimony card to begin -- and we'll
16 call you in the order received on those cards.

17 I'm going to turn it over to John Vassiliades
18 who is the project manager and is with the CalTrans
19 division of Project Management, and he'll provide you
20 with a brief overview of the project.

21 MR. VASSILIADES: Good evening, everybody. My
22 name is John Vassiliades. I am the project manager, and
23 I would like to welcome you to this opportunity. We
24 believe it's imperative to hear the public point of view
25 on this Arbor Vitae change project.

4

1 Any CalTrans projects has a lot of phases, and
2 before we actually go ahead and execute the project we
3 held this public hearing to hear the comments directly
4 from the public, and we like to hear your point of
5 view. We are not going to go anywhere on this unless we
6 get the clear go ahead signal from the public.

7 We are committed to give you the responses
8 that you want to. We are going to be utilizing your
9 taxpayers' dollars to bring an improvement in this city
10 of Inglewood by virtue of constructing the south half
11 interchange. The project entails three simple
12 components. We plan to construct an off-ramp going
13 northbound 405 Freeway to Arbor Vitae Street. We plan
14 to construct an on-ramp from Arbor Vitae Street east and
15 westbound to southbound 405, and we also plan to widen

Page 4

Public Hearing.txt
16 the Arbor Vitae bridge.
17 Currently the width of Arbor Vitae bridge is
18 78 feet, and we plan to widen it by six feet each way,
19 which is going to make it a total of 90 feet. We are
20 also building a cul-de-sac, and we are going to put some
21 retaining walls and some sound walls. That's all there
22 is in this project.
23 The estimate to this project is approximately
24 87 million. We don't have all the funds to build the
25 proposed half interchange as we envision it, but after

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1 this environmental process is completed, we plan to
2 pursue the other steps that I mentioned to you
3 previously.
4 We have some charts over here, and we have our
5 team comprised from the project engineer, our traffic
6 experts, environmental planners, folks from our public
7 affairs unit and all the other branches related to the
8 project delivery.
9 If any one of you has any questions, please
10 make sure you bring it up today at this meeting. If you
11 have to leave and you don't have the time to ask or make
12 the question, please make sure to pick up -- there is a
13 form at the entrance during the registration and go to
14 the center of the tables over there and place your
15 comments card in.
16 We are going to get back to you. We want to
17 get your input from each and every one of you. You must
18 have a reason to be here today, and we want to hear from
19 you.

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Public Hearing.txt
20 with that I'm going to -- is there a hand-held
21 microphone or use this one? We are going to show the
22 display over here with the letter services. On this
23 display over here -- let me go closer to it. Sorry.
24 Please.
25 we are trying to illustrate over here why we

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□

1 are doing this half interchange improvement. We believe
2 this project is going to help relieve congestion for the
3 405 Freeway and on the two interchanges currently on
4 Century Boulevard and on Manchester.

5 when the 105 freeway was constructed back in
6 the '80s, Arbor Vitae was envisioned as an alternative
7 access point to many points of interest. Those people
8 who are traveling toward LAX today on the westbound 105
9 Freeway, they take northbound 405, and they end up going
10 all the way to Manchester and then spending an extra 10
11 minutes of travel time to go around to find a way either
12 to Century or to other points of interest.

13 If they want to go, for instance, to Parking
14 Lot C to the airport, the race track, the casino, they
15 have to make this loop, travel around for another 10 or
16 15 minutes.

17 When we construct the Arbor Vitae interchange,
18 this is going to stop. Why? Because all these
19 motorists, they have an extra access point to this
20 location. They can exit on Arbor Vitae by going
21 northbound 405 Freeway and, as I mentioned before,
22 exiting on Arbor Vitae.

23 Also we put some numbers down over here. If

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Public Hearing.txt
24 you do have any questions, we will be more than happy to
25 answer you later on. We have displays over there with

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1 more explanation. We can go through more detailed
2 explanation, but you can see here is this highlighted in
3 green and some lightly highlighted green numbers, and
4 they illustrate the level of service. LOS stands for
5 level of service, which shows an improvement.

6 Currently Manchester and Century Boulevard are
7 at capacity. They are heavily congested. This project
8 is going to relieve the congestion on those two
9 interchanges, and it's going to provide greater mobility
10 and a use of travel time for all those passengers
11 traveling through the area.

12 The level of service, for instance, the
13 northbound off-ramp to Century Boulevard is going to be
14 improved from level of service C to level of service B
15 in the year 2035. Similarly, if you look at the
16 northbound off-ramp to Manchester Boulevard, is going to
17 go from level service E to level of service C. The
18 southbound on-ramp from eastbound Century Boulevard, is
19 going to go from B to A.

20 So for us, that gives us the justification to
21 say that we have a very viable project that is going to
22 improve mobility along the 405 Freeway. Okay. Thank
23 you.

24 We'll drop in the forum later on if you have
25 any questions. Now I will pass this to -- who is next?

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Public Hearing.txt

1 MS. DE LOZA: Simon Kuo. He is with the CalTrans
2 division of design, and he is going to give a brief
3 overview of the engineering design project.

4 AUDIENCE MEMBER: When do we get a chance to ask
5 questions?

6 MS. DE LOZA: As soon as we are done with the
7 presentation.

8 MR. KUO: Good evening, ladies and gentlemen. My
9 name is Simon Kuo, and I am with the division of design
10 at CalTrans. Tonight I am going to present you the
11 viable alternatives that have been identified for this
12 project, and afterwards I will briefly go over the
13 engineering features that are associated with the
14 proposed build alternatives.

15 The two viable alternatives for this project
16 are alternative 1, the no build alternative where we
17 would not build any project at all and alternative 2,
18 which is the build alternative for the south half
19 interchange project that we are presenting to you here
20 tonight.

21 The decision as to which project we select
22 when we finalize the environmental document will be
23 based on factors such as our engineering studies, the
24 environmental data that we have as well as the input
25 that we get from the public tonight as well as from

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1 other stake holders for the project.

2 so to briefly go over the build alternatives,
3 the -- I think John discussed this a little earlier.

4 For alternative 2 we would widen the Arbor Vitae Street
Page 8

Public Hearing.txt

5 over-crossing. That's the bridge structure that goes
6 over the 405 Freeway. It would be wider on both sides,
7 and that's to better accommodate the traffic to Arbor
8 Vitae Street with the new interchange located at this
9 location.

10 The new on-ramp is shown in white here. It
11 would go over the 405 Freeway and then connect onto the
12 southbound 405. The new off-ramp, northbound off-ramp
13 is shown in green here, and that would take off from the
14 -- from the existing northbound off-ramp to Manchester
15 and La Cienega. So that would branch off from that
16 off-ramp and exit to Arbor Vitae Street.

17 These new ramps are proposed to meet Arbor
18 Vitae Street at a single intersection located east of
19 the freeway, and that new intersection would be
20 signalized. The four legs of that intersection would be
21 at south Ash Avenue to the north, the north leg. The
22 east and west legs of that intersection would be Arbor
23 Vitae Street, and the south leg would be the new on-ramp
24 and off-ramp that we were proposing.

25 In order to build the new southbound off-ramp,

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1 again shown in white, we would build a new bridge
2 structure that goes over Interstate 405 carrying the
3 ramp traffic. Also in order to make room for this new
4 on-ramp we would have to realign slightly the existing
5 southbound on-ramp from Olive Street, which is right
6 next to it. There will be new retaining walls
7 constructed as well as a new sound wall shown in orange
8 here.

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Public Hearing.txt

9 In terms of the improvements for the
10 northbound off-ramp, again shown in green, we would have
11 to replace the Century collector over-crossing
12 structure. That's this tunnel structure located right
13 here, which currently separates traffic -- northbound
14 traffic from the Century Boulevard on-ramps from the
15 northbound off-ramp to Manchester. So that tunnel
16 structure, again, would have to be replaced in order to,
17 again, accommodate this new off-ramp that's coming off
18 of Arbor Vitae Street.

19 In addition to that work, we would also be
20 building new sound walls shown in orange along the
21 right-of-way in the northbound direction, the CalTrans
22 right-of-way in the northbound direction. Again, there
23 would be new retaining walls at various locations.

24 Also as part of this off-ramp work, we would
25 have to cul-de-sac south Ash Avenue. Instead of it

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1 connecting to Arbor Vitae Street that street now is
2 proposed to end in a cul-de-sac.

3 And finally, in terms of the right-of-way
4 impacts for this project, we are proposing to acquire
5 seven properties, seven parcels, which would affect nine
6 homes. And so again, that's a brief overview of the
7 proposed project.

8 MS. DE LOZA: Now I'm going to turn it over to
9 Ed Aguilar. He is with the CalTrans division of
10 environmental planning, and he is going to talk to you a
11 little bit about the environmental document that is
12 available for public review and the environmental review
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13 process.

14 MR. AGUILAR: Good evening. I am Ed Aguilar. I'm
15 with the CalTrans division of environmental planning.
16 It is the role of our division to ensure that the
17 project's environmental community impacts are identified
18 and properly assessed and documented during the project
19 decisionmaking process.

20 Pursuant to the National Environmental Policy
21 Act and the California Environment Quality Act, CalTrans
22 is prepared to draft environmental assessment and
23 initial study. This is what is collectively termed the
24 draft environmental document. It's termed draft because
25 it is a work in progress.

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1 CalTrans has and continues to solicit the
2 public's input so that we may identify deficiencies in
3 the document as well as to find ways to improve the
4 project. The draft environment document has been sent
5 out to review and comment to all pertinent elected
6 officials and government agencies at the local, county,
7 state and federal levels as well as to local residents,
8 chambers of commerce and community groups.

9 CalTrans will accept input regarding the
10 project and public sentiment during the selection
11 process, which we anticipate will occur in March. In
12 March we anticipate selecting either the no build
13 alternative, which is alternative 1, or alternative 2,
14 which is the proposed project and what Simon has just
15 presented.

16 CalTrans will carefully weigh the entire
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17 public comment record, the traffic data, the engineering
18 data and, of course, the environmental impact
19 data. CalTrans will then complete the final draft
20 environmental document.

21 As mentioned, the 45-day comment period began
22 on December 21 and will end on February 3rd. You can
23 submit your written or verbal comments here tonight or
24 in writing to CalTrans deputy district director
25 Ron Kosinski no later than February 3rd. Your written

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1 and verbal comments will become part of the public
2 record and will be included in the appendices of the
3 final draft and environment document.

4 whichever decision CalTrans makes in regard to
5 the project, everyone who submitted a formal comment
6 during the comment period will receive written notice
7 from CalTrans announcing the decision. Additionally,
8 all formal comments submitted to CalTrans will become
9 part of the public record and included in the
10 appendices, as I mentioned, of the draft environmental
11 document.

12 So at this time we are going to be in the
13 public testimony portion of this hearing. Thank you.

14 MS. DE LOZA: Before we begin the testimony, I just
15 want to point out that we do have a court reporter who
16 is shorthanding all of your comments, and it will be
17 part of the formal comment. We are also streaming the
18 video -- the presentation on video stream, and it will
19 be available to folks starting tomorrow and on the
20 project website, which is www.arborvitae.com --
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21 I'm sorry -- accessarborvitae.com, and we are also
22 providing live Twitter feed as well to participants that
23 were not here tonight.

24 If you would not like to be videotaped for
25 whatever reason, just make that known when you come up,

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1 and we will take the camera off of you. Again, so as we
2 are live webcamming the proceedings tonight.

3 I have three speaker parts, actually four, but
4 one of them is just a verbal comment that we will read.
5 If there are any more comments, please raise your hand,
6 and someone will pick them up.

7 AUDIENCE MEMBER: Where do you get those?

8 MS. DE LOZA: You get them at the very front. We
9 will get you one in a minute.

10 With that, I'm going to start the comment
11 period and call Noel Hauser.

12 MR. HAUSER: That's me.

13 MS. DE LOZA: Come up to the mic. Followed by
14 Keith Lockhard.

15 There is a microphone right there.

16 MR. HAUSER: Every day Obama, President Obama --
17 I'm sorry -- he tells us he is broke. The federal
18 government is broke. China loans us. Some of their --
19 some of their administration ran us into a real terrible
20 kind of -- I can't get it right now. No money.

21 Arnold Schwarzenegger talks to us, the
22 governor, and he says there is no money. So where are
23 we going to get the money? Is an angel going to come
24 down from Disneyland and make it? We are broke. We are
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25 busted. I didn't get two raises already this year

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1 because of the economy, and here you guys are
2 spending -- what is it -- \$87 million on a
3 stupid project? That's terrible.

4 And in the article -- I have the article. I
5 brought it with me. In the third paragraph or second
6 paragraph it says, well, they are reducing the time.

7 Let me see -- in the fourth paragraph it says, "Moose
8 (phonetic) true and environmental preview," and then in
9 the fourth it says it's already released.

10 What are you guys doing to us? Is there two
11 reports or one? That's a question. Is there anybody
12 that has an answer? Did you read the article in the
13 paper, in the Daily Breeze?

14 MS. DE LOZA: Daily Breeze article tonight?

15 MR. HAUSER: Did you read it?

16 MS. DE LOZA: Yes.

17 MR. HAUSER: And then I got a little bit more, the
18 environment. The empty fields, you put up a thing over
19 there, and it shows all those homes in Westchester, and
20 I think they are trying to slip the cards on us, and it
21 was over here just a minute ago. All of them homes,
22 they are damned gone. That's not good English, but it
23 gets my point over. Those buildings are capital
24 g-o-n-e. They are gone. Put it in an empty field.

25 You know, I'm not a bright person, but I know

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1 if I'm going to extend a road or do like this -- you
2 guys are going to do, put it where all the properties
3 are there. They might belong to LAX, but you guys might
4 be able to work something out. It used to be called
5 Manchester something, that area there, that part of
6 Westchester. Do you know where I'm talking about, right
7 across the street?

8 And then I took a ride, and I started -- I
9 knew that the major streets, you know, in this area are
10 one mile apart, you know, like it's one mile from the
11 center of Manchester to the center of Century. So I
12 rode it. And it was three -- four entrances to the
13 freeway. Let me qualify. Four places where you can get
14 off the freeway or on.

15 And the one that feeds in from Olive Street,
16 the first one after going south after Manchester, it's
17 got a big area. It's so damned big that CalTrans
18 painted the road white and stripes, and it's made for
19 the big trucks to make the turn to get southbound on the
20 San Diego Freeway. Did you guys ever go look at that?

21 If you are going to put an \$87 million baby in
22 this area, go to -- go not even a half a mile. It's got
23 the ramp. It feeds it. If you are on Manchester going
24 into Inglewood or you are already in it at the railroad
25 tracks, it makes a turn and quick kind of little thing,

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1 and it leads right into the freeway off of Owl Street
2 and the sucker is this wide. It's from here to that fan
3 over there.

4 And it's a funny looking one because it's not

Public Hearing.txt

5 just like, you know, the one paint follows the other to
6 the outside of them, you know. This one here --
7 MS. DE LOZA: Mr. Hauser, can you wrap up, please?
8 MR. HAUSER: Yeah. Please, get in your car. You
9 have my permission, and you can drive down there and
10 look at that one on there because we don't need that
11 monster sitting in there on Arbor Vitae Street. You are
12 going to widen the bridge and all that? The trucks that
13 are going to be stopping there, there is going to be a
14 traffic light; yes, no?
15 MR. VASSILIADES: On Arbor Vitae?
16 MR. HAUSER: Yeah.
17 MR. VASSILIADES: Yes.
18 MR. HAUSER: They are going to stop, the big trucks
19 on Arbor Vitae, and guess what they're going to do? They
20 are going to stink up the damn area.
21 MS. DE LOZA: Thank you, Mr. --
22 MR. HAUSER: They are going to go into Inglewood --
23 MS. DE LOZA: Thank you, Mr. Hauser.
24 MR. HAUSER: -- every day.
25 MS. DE LOZA: Thank you for your comments.

18

1 Keith Lockard followed by David Coffin.
2 MR. LOCKARD: Good evening. My name is
3 Keith Lockard. I'm the principal transportation
4 engineer for the City of Inglewood public works
5 department and representing the public works department
6 tonight.
7 We have an august interest in this particular
8 project that is planned or proposed in our community as

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<p>Public Hearing.txt</p> <p>9 the new infrastructure with the freeway ramps would 10 interface with our existing infrastructure and our 11 existing land use. We appreciate the coordination with 12 CalTrans, particularly Eddie Isaacs, who allowed us to 13 offer comments on a preliminary copy of the draft last 14 fall.</p> <p>15 And our planning and building department staff 16 offered comments on air quality, noise, land use, 17 environmental justice. The people in our water division 18 of public works offered comments on land resources and 19 water resources and wrote comments on the transportation 20 section and particularly focused on clarity of the 21 information so that the public could clearly understand 22 the proposed improvements and the information contained 23 in the report.</p> <p>24 One particular concern that I would like to 25 bring forward tonight is that at the southeast corner of</p> <p style="text-align: right;">19</p> <p>0</p> <p>1 Ash Street with Arbor Vitae is a property that has an 2 address of 670 West Arbor Vitae that is proposed for 3 acquisition for the construction of a cul-de-sac street. 4 For that same property we have an approved project for 5 Metro funding for which we are currently designing a 6 parking lot, so there would be a conflict with the 7 current design represented for alternative 2 with the 8 cul-de-sac and the parking lot that we will need to 9 resolve if the alternative 2 project for a half 10 interchange goes forward with construction starting in, 11 I believe, 2013 as represented in the documents.</p> <p>12 And we'll look forward to continuing the</p> <p style="text-align: center;">Page 17</p>	<p style="text-align: right;">T1</p> <p>Caltrans Response #29:</p> <p>A. The right of way taken up by the proposed parking lot is needed for the half interchange project under the current design. Should the project move forward in the future, an alternative location for parking will be looked at.</p>
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<p style="text-align: center;">Public Hearing.txt</p> <p>13 relationships with CalTrans and the other people 14 involved in the project. Thank you.</p> <p>15 MS. DE LOZA: Thank you.</p> <p>16 Diane Sambrano followed by Anthony Kappa.</p> <p>17 MR. KAPPA: I am Anthony Kappa. I have a question 18 rather than a comment, and that is, you are talking 19 about widening Arbor Vitae. I have two properties on 20 Arbor Vitae just west of Inglewood Avenue. I have 21 tenants in them, of course, and one of my tenants has 22 been there with us for 34 years.</p> <p>23 And I'm wondering, are we widening Arbor Vitae 24 50 feet from the center of Arbor Vitae now on each side 25 or from the curb 50 feet? Is there an answer for that?</p> <p style="text-align: right;">20</p> <p>□</p> <p>1 And are you going that far east? How far -- are you 2 widening Arbor Vitae from the 405 all the way to the 3 racetrack where it stops?</p> <p>4 MS. DE LOZA: We will get back to the other two 5 questions that were asked previously.</p> <p>6 MR. VASSILIADES: The proposed widening on Arbor 7 Vitae is only six feet on each direction. Currently the 8 total width on Arbor Vitae from edge to edge is 78 feet. 9 The ultimate design for Arbor Vitae is going to be 90 10 feet, 12 feet wider. Does that answer your question?</p> <p>11 MR. KAPPA: Not really.</p> <p>12 MR. VASSILIADES: And the widening is only going to 13 stay within the state right-of-way leads, which means 14 that we are not going to go beyond toward the City of 15 Inglewood, nor toward the City of L.A. It's only within 16 the state right-of-way, which is the bridge area. Does</p> <p style="text-align: center;">Page 18</p>	<p style="text-align: right;">T2</p> <p>Caltrans Response #30:</p> <p>A. As originally proposed, Arbor Vitae St would have been widened just in the vicinity of the Interstate 405 by approximately 6 feet in each direction at the Interstate 405 freeway to accommodate the new freeway interchange. Arbor Vitae Street would not be widened at any other location. Should the project move forward in the future, the need for widening Arbor Vitae Street at other locations will be evaluated further.</p>
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Public Hearing.txt
 17 that answer your question?
 18 MR. KAPPA: I really don't understand how far --
 19 how far from the center of the street are you going?
 20 MS. DE LOZA: Mr. Kappa, the only area that is
 21 being widened is the bridge that goes over the 405
 22 Freeway.
 23 MR. KAPPA: Okay. Then you go into a one-lane
 24 road, which is Arbor Vitae has one lane. You are going
 25 to dump a lot of cars in there. What are you solving?

21

1 I don't know what you are going to solve. The signal at
 2 Inglewood Avenue right now in the evening, the traffic
 3 is backed up for a quarter of a mile trying to get
 4 across Inglewood Avenue.

5 If Arbor Vitae itself is not going to be
 6 widened all the way to the racetrack, at least to the
 7 end, then I don't know what good that's going to do
 8 because when you get to Prairie Avenue, it's going to be
 9 a gridlock. I don't really understand your reasoning on
 10 some of this. Thank you.

11 MS. DE LOZA: Thank you.

12 Diane Sambrano.

13 MS. SAMBRANO: Good evening. Let me begin by
 14 saying this is 150 pages. This gives me one second to
 15 comment on each page. So I will direct your attention
 16 right now to page 150. Those 900 signatures, 313
 17 signatures, 341 signatures previously given on petitions
 18 as well as the other comments should not be negated.
 19 Those comments do not cease to exist simply because you
 20 bring back the plan over and over and over again.

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Caltrans Response #30 Continued:

A. As originally proposed, there would have been a shift in the sidewalk location that would allow for a continuous sidewalk. Due to the restrictions of the existing infrastructure, there is insufficient space to construct a southbound Onramp originating from west of the Interstate 405 freeway.

Public Hearing.txt
 21 We have stated before we do not want it. We
 22 have no need of it, and we do not appreciate the
 23 misrepresentation that you have actually reached out to
 24 us again. I have signed up on these commented cards
 25 what, 6, 8, 10, 12, 15 times, and I still have to make a

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1 phone call to get the EIREIS. I'm sorry. This is an
 2 initial study, wrong terms. Trying to beat the clock
 3 here.

4 For me to believe that you have this -- at any
 5 point the interest of the 20,000 people that don't use
 6 the Forum on Sunday, sorry. Can't go there. You want
 7 me to believe that the Hollywood Park racetrack that's
 8 going to become nothing for a long time really needs
 9 transportation? I don't think so.

10 Try calling 411 and getting the phone number
 11 for the University of West Los Angeles, the other stated
 12 purpose of transportation assistance need. They don't
 13 even have a phone listing. This is all about the
 14 airport no matter what you try to make us believe. We
 15 are not quite that clueless.

16 Once again, you state in here the sound
 17 monitors only when there was not other background
 18 sound. Let me see. That would be between midnight and
 19 6:00 when the airport doesn't -- whoops. Wait a
 20 minute. There is at least 14 planes that go between
 21 midnight and 6:00. I don't think there is a point in
 22 time in this community at that location that there is a
 23 time when there is not already background noise.

24 As far as your sound walls, you ran out of

Page 20

Caltrans Response #31:

A. Traffic noise study considers/analyzes only freeway traffic noise. All traffic noise readings are conducted when no other contaminating noise sources are present. In locations where other noise sources are present, such as airplane noise, the sound level meters can be switched to stand-by mode or set to read short 1-minute intervals in order to isolate the noise source of interest and prevent contamination from other sources such as aircraft, trash trucks, barking dogs, etc.

<p>Public Hearing.txt</p> <p>25 money the last time you did it, and we still don't have</p> <p>0 23</p> <p>1 a sound wall. Today we are talking about soil erosion, 2 and yet last -- what was it -- three weeks ago your 3 crews went in and wiped out a whole bunch of green, and 4 now we have soil erosion near one of the only remaining 5 39 historic sites in Los Angeles County. whoops. Guess 6 you forgot about that. After all, it was your third 7 grade class that taught you about soil erosion, and you 8 dismissed it. whoops.</p> <p>9 From my vantage point no project is the only 10 project. From my vantage point you should have held to 11 the promises you made before about sound walls and 12 retaining walls the last time you enlarged this 13 freeway. This is not a project that is good for 14 Inglewood residents on any remote concept level where 15 humanity is thought of as valuable.</p> <p>16 MS. DE LOZA: Thank you, Miss Sambrano.</p> <p>17 That concludes my speaker cards. Go ahead. 18 Please state your name for the record.</p> <p>19 MR. COFFIN: David Coffin, Westchester city council.</p> <p>20 MS. DE LOZA: That's right. Sorry.</p> <p>21 MR. COFFIN: I want to thank you for the 22 opportunity for public review and invitation to comment 23 on the proposed interchange at 405 and Arbor Vitae. 24 After having read the initial draft, the draft 25 environmental initial assessment study, there appears to</p> <p>0 24</p> <p>1 be a number of critical details missing in the study. Page 21</p>	<p style="text-align: right;">T3</p> <p>Caltrans Response #31 Continued:</p> <p>A. Construction activities related to this proposed project could expose soils to temporary erosion. In order to reduce, this temporary erosion, NPDES and BMPs will be implemented during project construction. As stated before, there will not be a change in the existing rate of erosion as a result of this project.</p> <p>B. It is unclear what Ms. Sambrano refers to regarding "the only remaining 39 historic sites in Los Angeles County". The National Register of Historic Places and the California Register of Historic Places both has hundreds and hundreds of "historic sites" in Los Angeles County. None of these are going to be impacted by this project, nor are any other cultural resources in Los Angeles County going to be impacted by this project. No action by Caltrans in the project area (in the last three weeks or in the last year) has resulted in the exposure of a cultural resource to damage by erosion.</p> <p>C. Traffic noise study considers/analyzes only freeway traffic noise. All traffic noise readings are conducted when no other contaminating noise sources are present. In locations where other noise sources are present, such as airplane noise, the sound level meters can be switched to stand-by mode or set to read short 1-minute intervals in order to isolate the noise source of interest and prevent contamination from other sources such as aircraft, trash trucks, barking dogs, etc.</p>
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2 The draft EAIS does not cover the traffic
 3 impacts at the proposed interstate 405/Arbor Vitae
 4 interchange would have on the surrounding communities,
 5 specifically Arbor Vitae in both east and west
 6 directions.

7 In order for the surrounding communities to
 8 properly assess the impact that the project would have
 9 on them, a thorough traffic study conforming to the
 10 highway capacity 2000 manual needs to be performed.
 11 Missing in the draft EAIS is a detailed analysis of the
 12 number of vehicle trips through the current and proposed
 13 on-ramps and off-ramps noted in the report.

14 Also missing is an analysis of the trips
 15 through all the major intersections within a two-mile
 16 radius of -- that is being serviced by the project. The
 17 draft EAIS provides only a sum total of the vehicles
 18 passing through these points -- through the interchange
 19 at peak hours and daily average.

20 The study does not provide any details or data
 21 to support the study's vehicle trip totals, and it says
 22 nothing about where these vehicles are going to be
 23 coming or going. For instance, other reported vehicles
 24 exiting northbound 405 at Arbor Vitae, how many of the
 25 roughly 20,000 vehicles are heading east into Inglewood

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 1 or west into Westchester, LAX? How many of the 21,000
 2 vehicles in the opposite direction are entering the 405
 3 on-ramp and from what direction?

4 Similarly, the draft EAIS fails to anticipate
 5 the project -- anticipate and project the amount of cut-
 Page 22

Caltrans Response #32:

A. A thorough traffic analysis has been performed by CH2M Hill that includes the impacts that the proposed but rejected half interchange would have on Arbor Vitae Street west and east of the Project Study Area and on the surrounding communities.

The traffic analysis includes a detailed analysis of number of vehicle trips through the current and proposed but rejected onramps and offramps and an analysis of vehicle trips through all major intersections within 2 miles that would have been serviced by this project. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for answers to your comments.

In regards to exiting Northbound Interstate 405, with Alternative 1, no vehicles per day in 2007, 2014, and 2035 will travel along Arbor Vitae Street as the Half Interchange will not be built. With Alternative 2, from Northbound 405, no vehicles per day in 2007, 8943 in 2014, and 21,017 in 2035 will travel either east into Inglewood or will travel west into Westchester/LAX on Arbor Vitae Street.

In regards to entering Southbound Interstate 405, with Alternative 1, no vehicles per day in 2007, 2014, and 2035 will come from Arbor Vitae Street as the Half Interchange will not be built. With Alternative 2, entering Southbound 405, no vehicles per day in 2007, 8376 in 2014, and 20,097 in 2035 will travel from Inglewood in the east or from Westchester/LAX in the west on Arbor Vitae Street.

With Alternative 2 (2035), 16,476 vehicles per day will head east into Inglewood and 12,276 vehicles per day will head west into Westchester/LAX on Arbor Vitae Street. Also, with Alternative 2, 17,220 vehicles per day are entering the Southbound Onramp. It is not known from which directions vehicles are coming from.

<p style="text-align: center;">Public Hearing.txt</p> <p>6 through traffic that the proposed interchange would 7 generate. In order to avoid the Manchester off-ramp, 8 many drivers might choose to use the Arbor Vitae 9 off-ramp and take shortcuts through residential streets 10 such as Oak Street, Cedar Avenue and Inglewood Avenue 11 and finally make their way to Manchester. How many 12 cut-through vehicles do you project?</p> <p>13 The EAIS suggested the proposed Arbor Vitae 14 off-ramp will be serving almost three times as many cars 15 as Manchester currently does today. In order to avoid 16 the unintended consequences of an ill-planned project, a 17 more thorough analysis needs to be provided by Caltrans 18 to city officials and the community to provide a 19 complete picture of the project's impact on the 20 community and interstate 405 commuters.</p> <p>21 Thank you.</p> <p>22 MS. DE LOZA: Thank you.</p> <p>23 We are going to attempt to answer some of the 24 questions. We cannot answer them -- all the questions 25 will be responded to in the final environmental</p> <p style="text-align: right;">26</p> <p>0</p> <p>1 assessment, the initial study. I've got three. Where 2 are you going to get the money to build this project?</p> <p>3 MR. VASSILIADES: As I stated previously, I said 4 there is a project shortage of about 35 to \$37 million. 5 The project is currently funded through the state 6 transportation improvement program. It's called STIP. 7 It was funded in the year 1998. The total available 8 funds today is about \$53 million. To build this 9 interchange we need about 85 to \$87 million.</p> <p style="text-align: center;">Page 23</p>	<p style="text-align: right;">T4</p> <p>Caltrans Response #32 Continued:</p> <p>A. The traffic analysis includes a detailed analysis of number of vehicle trips through the current and proposed but rejected onramps and offramps and an analysis of vehicle trips through all major intersections within 2 miles that would have been serviced by this project. See Section 2.1.6 Traffic and Transportation/Pedestrian and Bicycle Facilities of the Final Environmental Document for answers to your questions.</p> <p>In regards to exiting Northbound Interstate 405, with Alternative 1, the Preferred Alternative, no vehicles per day in 2007, 2014, and 2035 will travel along Arbor Vitae Street as the Half Interchange will not be built. With Alternative 2, from Northbound 405, no vehicles per day in 2007, 8943 in 2014, and 21,017 in 2035 will travel either east into Inglewood or will travel west into Westchester/LAX on Arbor Vitae Street.</p> <p>With Alternative 2 (2035), 16,476 vehicles per day will head east into Inglewood and 12,276 vehicles per day will head west into Westchester/LAX on Arbor Vitae Street. Also, with Alternative 2 (2035), 23,004 vehicles per day will head east into Inglewood and 12,336 vehicles per day will head west into Westchester/LAX on Arbor Vitae Street. Alternative 2 would have 17,220 vehicles per day are entering the Southbound Onramp. It is not known from which directions vehicles are coming from.</p>
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10 To answer the question for the gentleman who
11 says how is this project going to be funded, as you can
12 see, sir, this project is actually funded today. The
13 money comes from both the federal government as well as
14 the state government through the gasoline tax. Each and
15 every time one of us goes to the gas station to get gas
16 we pay tax. And this is how all transportation
17 improvement projects that the state builds are funded.
18 The remaining shortfall of about 35 to \$37
19 million remains to be resolved. After the environmental
20 process is completed, then we are going to have to go
21 through serious discussions to secure additional
22 funding. If that doesn't become reality, the project
23 doesn't go anywhere.
24 Just like I said to you before, every project
25 has different phases. This is the first phase. We

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1 develop a plan for your review. You the resident, the
2 taxpayers give your input. We do not advocate. We
3 don't take sides. We are professionals. We are just
4 doing our job. We are stating the facts, and you help
5 us deliver what people want us to do.
6 We as professionals, we identified a purpose
7 and need. What we came here clearly to state tonight is
8 that this project is going to relieve congestion. We
9 are not doing it to benefit the LAX. We are doing it
10 just like all other projects that the State of
11 California Department of Transportation builds to
12 relieve congestion on the state highway system.
13 We are not increasing capacity at the LAX.

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14 Okay? So please have a clear understanding that we are
15 trying to make life easier for people who are traveling
16 on the 405 Freeway who are utilizing those two
17 interchanges today, and as we stated and as we
18 illustrated before you, with this change there is going
19 to be a significant level of service improvement.
20 That's why we believe this is a viable and a vital
21 improvement project for the community to improve
22 congestion.

23 Thank you.

24 AUDIENCE MEMBER: I have to say something here. I
25 have read the article in the Daily Breeze, and it says

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1 only partially funding with \$53 million.

2 MR. HAUSER: That's only math. That's why it needs
3 87-.

4 MR. VASSILIADES: That is because the last time we
5 were assembled at the previous public hearing about ten
6 years ago, we had funds to fully deliver this project
7 the way we designed it. But because the opposition to
8 this project was so successful opposing anything
9 relating to improving life anywhere near LAX including
10 sound board projects to reduce the noise levels, we
11 ended up not being able to deliver it because of the
12 scrutiny that we had to go through. Ten years later \$53
13 million is not enough.

14 Is your grocery bill the same as it was ten
15 years ago? Inflation, so we have 53 million we got ten
16 years ago, and we need more money to deliver it.

17 MR. HAUSER: It sounds like you had the money, and
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18 you don't.

19 MR. VASSILIADES: Excuse me?

20 MR. HAUSER: From what you said it sounds like to
21 the average person, which I consider myself, that you
22 had the money, which you don't.

23 MR. VASSILIADES: We had 53 million back then.

24 Today we need 85 to 87 million today. This has not been
25 resolved yet. Like I said to you before, sir, every

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1 project has different phases. We are only on the
2 preliminary phase. We are trying to resolve the
3 environmental issues. We are not going to go anywhere
4 if we start debating the issue whether this is going to
5 help the LAX or not.

6 The idea over here is that we have a very good
7 project to improve the quality of life in the area. We
8 are proposing a congestion improvement project, and you
9 see it not as a congestion relief project, but you are
10 seeing it as an expansion project to the LAX. We do not
11 work with LAX.

12 MR. HAUSER: Put it on other side --

13 MS. LE LOZA: The other question we have was are
14 there two documents. Ed, do you want to take that
15 question?

16 MR. AGUILAR: There is only one environmental
17 document. The project that is on the table has two
18 alternatives. The do nothing, the no build, that is
19 alternative 1. Alternative 2 is the proposal you have
20 just seen described. There is one environmental
21 document to that. That was released December 21, 2009,
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22 and the comment period for that document is going to end
23 February 3rd of this year. So one environmental
24 document.

25 MS. DE LOZA: The other question we got when the

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1 public comment period happened is what are you solving
2 was the question with this project.

3 MR. AGUILAR: That question is similar to another
4 question relating to purpose and need. The purpose and
5 need of the project is to reduce congestion at Century
6 and Manchester at 405. You have got to keep that in
7 mind. It's a very narrow purpose.

8 So -- and as it shows -- the traffic study
9 shows that implementing this new south half interchange
10 improves the level of service at Century and Manchester.
11 So when you think of the project, think of it in those
12 narrow terms. The purpose -- and CalTrans achieves that
13 purpose with this project. Okay.

14 The fourth speaker, Diane, mentioned that this
15 is a component of the LAX project. Let me reiterate the
16 purpose and need. That's the purpose of this project.
17 There is an existing congestion at Century and
18 Manchester. There are numerous sources of that
19 congestion. There are also new developments in the
20 pipeline, in the works as we speak.

21 One of those developments is the Hollywood
22 Park expansion, which plans to introduce 620,000 square
23 feet of new retail and entertainment, 75,000 square feet
24 of new offices, 10,000 square feet of new community
25 space, a new 120,000 square foot casino, a new 300-room
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1 hotel with 20,000 square feet of meeting facilities and,
2 last but not least, 3,000 new homes.

3 So the community is growing whether or not
4 this project is implemented or not. So that was the
5 point there.

6 MS. DE LOZA: There were a couple of questions that
7 came through our webcam, and one of them was will Arbor
8 Vitae be widened again? The City of Inglewood has
9 already widened it.

10 MR. AGUILAR: Widening Arbor Vitae is not part of
11 this proposal. It has not been discussed with the City
12 of Inglewood. At this time only the bridge is being
13 proposed for widening, and it is still going to remain
14 one lane.

15 MS. DE LOZA: The other question that came through
16 the webcam was acquisition of property. Will tenants be
17 financially assisted with relocation?

18 MR. AGUILAR: And that also relates to another
19 question that asks how the eminent domain process is
20 coming along.

21 Keep in mind this is a proposal at this time.
22 Nothing is final. We are in the environmental document
23 process. At this time we might still choose not to
24 build it. In fact, ten years ago CalTrans made a
25 similar proposal that was shelved based on public

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1 sentiment.

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2 So these are various proposals. And the
3 environmental document would have to be approved, and
4 then the engineering process would begin, the
5 engineering design, which is called the project
6 specifications and estimates.

7 At that point our right-of-way agent would
8 contact the homeowners and begin discussing the benefits
9 afforded to them by the Uniform Relocation Act. And at
10 that point, you know, they are offered fair market value
11 for their property, but that's way down the line.

12 It's premature to be discussing eminent domain
13 at this point, but we do have right-of-way agents here
14 who can answer your questions back there, your specific
15 questions regarding eminent domain, but it's by no means
16 a sure thing.

17 MS. DE LOZA: The other question we got through the
18 webcast was, does this project have any correlation to
19 the properties that were purchased off La Cienega and
20 Arbor Vitae?

21 MR. AGUILAR: No, no.

22 MR. VASSILIADES: This project has very few
23 interactive characteristics. First of all, this is a
24 state project. Okay? For us to expend money we have to
25 have the preauthorization. If we don't have the

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1 environmental clearance, how can we go and buy anything?
2 we haven't bought anything yet along with the properties
3 that we have previously identified.

4 Once we get the environmental process cleared,
5 we are going to be contacting the homeowners for

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Public Hearing.txt
6 possible acquisition, but the project doesn't go
7 anywhere unless we get this environmental process
8 through. So not a single penny is spent to acquire any
9 property for this specific project yet.

10 Thank you.

11 MS. DE LOZA: And then the final question is, is
12 there possibility of including an additional
13 alternative? Why are there only two alternatives
14 presented?

15 MR. AGUILAR: This is not a new project that has
16 gone through various iterations. There is a handout --
17 there was a handout given at the welcome table. It's a
18 grid that shows -- the colors are green and blue. It
19 shows the various alternatives, the various iterations
20 this project has gone through.

21 You know, based on public input, based on
22 previous public hearings and circulation periods, we
23 have eliminated those alternatives. They are no longer
24 on the table now. We are down to these two. So if you
25 look at the big picture and look at the project's

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1 history, there were several alternatives, and they have
2 been eliminated, and now we are down to these two.

3 So if you need me to show you that grid, feel
4 free to approach me later, and I will walk you through
5 it.

6 MS. DE LOZA: I want to ask Simon to come up and
7 answer this question by Jerry McAloney. How will the
8 widening of the bridge on the north side affect property
9 on Arbor Vitae between 405 and Ash? Why didn't they put

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10 a south on-ramp on the west side of the 405 to reduce
11 congestion?

12 AUDIENCE MEMBER: I'm not going to take your time.
13 I'm --

14 MR. KUO: To answer the first part of the question,
15 the widening on the north side of Arbor Vitae Street
16 over-crossing will not affect properties on the north
17 side of Arbor Vitae Street between the 405 Freeway and
18 Ash Avenue.

19 AUDIENCE MEMBER: Speak up.

20 MR. KUO: I'm sorry. I'm sorry. The only property
21 impacts are on the south side of Arbor Vitae Street.

22 In terms of the second part of the question,
23 why didn't they put a south on-ramp on the west side of
24 405. Putting another ramp intersection along Arbor
25 Vitae Street in that short stretch would add too many

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1 intersections on Arbor Vitae Street. So we are trying
2 to minimize the number of additional intersections that
3 are added considering that La Cienega and Arbor Vitae is
4 a major intersection and not too far away from this
5 location.

6 MR. MCALINEY: I'm an -- speaking last.

7 MS. DE LOZA: Please state your name for the
8 record.

9 MR. MCALINEY: I'm Jerry McAliney. I just have
10 some questions on what he just answered. First of all,
11 I own the property next to the freeway between 405 and
12 Ash, and I have for over 30 years, and this project has
13 been going on for over 30 years because, when I brought

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 14 the property, I think it's design No. 25 at that time.
 15 I used to call every six months and ask how is
 16 it coming. Always the same answer. We don't know
 17 anything yet. I don't know how much money has gone into
 18 that project just designing it. But anyway, I don't
 19 know how six feet, if they widen the bridge on the north
 20 side, what the point is because my property, you
 21 couldn't -- that would eliminate the sidewalk. I mean,
 22 in other words, the lane would come right up to the
 23 sidewalk. There would be no way to get from the
 24 sidewalk to the bridge to cross on Arbor Vitae to La
 25 Cienega. That's one point.

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 1 The other point is why wouldn't they have put
 2 the -- eliminate having to build a bridge to go on the
 3 off-ramp south when they could put the off-ramp -- if
 4 they needed another off-ramp, put it on the west side of
 5 the freeway? They already have two off-ramps there now,
 6 one just before Century and one just south of
 7 Manchester. Neither one of them seems to be overly
 8 congested or ever has been overly congested, and that
 9 would save an enormous amount of money building a
 10 bridge.

11 The other comment I had is, they seem like
 12 they would need more of a northbound on-ramp and to put
 13 that -- to keep everything basically on the west side of
 14 the freeway over on La Cienega which is commercial
 15 properties and the airport -- City of Los Angeles has
 16 already brought all that property from Arbor Vitae, La
 17 Cienega all the way down to Century. Why not utilize

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Caltrans Response #33:

A. The offramp on the Westside of Interstate 405 would not meet the purpose and need of the project.

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18 that instead of impacting the residential area on the
19 east side of the 405?
20 MR. VASSILIADES: There are many different studies
21 being made to reach this final configuration. There is
22 a process we call the value analysis where we bring
23 experts in the field, and we brainstorm different
24 alternatives and proposals. When we finally reached
25 this design, it was after a very thorough, detailed and

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1 exhausting process of putting different proposals on
2 paper and estimating what will be the cost and the
3 viability of each and every option.
4 There is a cost consideration when -- if we
5 don't supposedly put the off-ramp on this current
6 illustration and we put it on the other side of the
7 freeway, it's going to drive up the cost or
8 geometrically we cannot put it in because it provides
9 conflicts with the maneuverability of vehicles.
10 So many different proposals have been
11 examined. The only ones that survived were these two
12 options, the southbound 405 on-ramp from Arbor Vitae and
13 the northbound 405 off-ramp to Arbor Vitae after a
14 thorough and exhausting review and examination process.
15 Does that answer your question, sir?
16 MR. MCALINEY: It still doesn't, but --
17 MR. VASSILIADES: We examined many different
18 proposals. We sat down and had calculators and examined
19 the viability of each and every alternative.
20 MR. MCALINEY: You don't think not having to build
21 a bridge would be cheaper than putting an on-ramp on

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22 that side of the freeway?
23 MR. VASSILIADES: It cannot happen because each
24 proposal has a different estimate, different number of
25 properties are going to be impacted, different value for

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1 each and every property. so this was the least
2 expensive and the most viable alternative of all the
3 other considerations.
4 MR. HAUSER: There are no properties on that side.
5 They just tour down the properties on the corner of
6 Arbor Vitae on the north side, the west side. They just
7 took -- that picture there --
8 MR. VASSILIADES: We don't own anything on the
9 other side, sir.
10 MR. HAUSER: What?
11 MR. VASSILIADES: Okay. You are saying we should
12 have put -- yes, should have put in southbound over
13 here?
14 MR. HAUSER: Right.
15 MR. VASSILIADES: We examined this. It didn't
16 work.
17 AUDIENCE MEMBER: Can you tell us why it didn't
18 work?
19 MS. DE LOZA: Can you answer that question in the
20 document? Maybe we can answer that question in the
21 response to comments.
22 MR. VASSILIADES: We can step down and examine --
23 MR. HAUSER: Show of hands for the people that are
24 ready to approve property -- approve what they see and
25 see how many people want to move on the other side.

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Caltrans Response #33 Continued:

A. A bridge over Interstate 405 would not meet the purpose and need of the project.

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1 MR. VASSILIADES: We don't to it by referendum. We
2 agree by analysis, geometric metric design and decide
3 what is the best option. We did examine this option, by
4 the way, but it was ruled out.

5 MR. HAUSER: So --

6 MR. VASSILIADES: It was cost prohibitive.

7 MR. HAUSER: So you are doing away with the vote
8 of the citizens?

9 MR. VASSILIADES: We don't go by the vote because
10 the citizens -- the truth is that's a more expensive
11 option. Who is going to fund it?

12 MR. HAUSER: We don't have any money to do
13 anything. Schwarzenegger says it. You said it. We
14 have 50 million and you need 87. What are you,
15 genies?

16 MR. AGUILAR: Your vote is being recorded by
17 everything you say by the court reporter. Your comments
18 become part of the public record. They go in the
19 environmental document. We have yet to hear the City of
20 Inglewood's position, the City of L.A.'s position, the
21 elected officials at the local, state, county and
22 federal level. So we are taking a big gigantic vote.

23 MR. HAUSER: Do you know how many people are in the
24 room that work for CalTrans and the state? Do you know
25 how many people are in the audience right now? So you

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1 can get somewhat of a nonbiased vote. I guess the guy
2 in front of me, he might work for CalTrans. How many
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3 people are just regular old property owners in Inglewood
4 and vote on the damn thing?

5 MR. MCALINEY: This pertains to the environment,
6 which is traffic, right? You have to agree or not agree
7 to having both an on-ramp and off-ramp right there
8 together is going to create more traffic and more
9 congestion there than if you divided it up.

10 MR. VASSILIADES: The quality interchange --

11 THE REPORTER: Can't hear you.

12 MR. VASSILIADES: we examined this design, but you
13 know, we had to go through many different reviews at the
14 federal as well as local levels. The proposal that you
15 have just mentioned is called single point interchange,
16 and this was ruled out. We cannot build it. We cannot
17 build it.

18 MR. MCALINEY: Where is that the logic?

19 MR. VASSILIADES: Because we can't build it.
20 Geometrically we won't be in a position to do it. The
21 traffic engineers believe that this is not going to help
22 us attain the improvement levels of service that we are
23 pursuing. Before when we show you on the picture with
24 the various color of level of services, we said that by
25 putting these two ramps we are improving the level of

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1 service.

2 If we do the single point interchange, instead
3 of doing any improvement, we are going to deteriorate
4 the traffic levels as they are today. We would have not
5 made an improvement with a single point enter change.

6 MR. AGUILAR: I mentioned this grid. This grid
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7 here, I mentioned it earlier. It shows the six
8 alternatives that have been studied over the last, what,
9 30 years, John?

10 MR. VASSILIADES: Yes.

11 MR. AGUILAR: So it's a really great grid to really
12 compare the environmental impacts and each alternative
13 as it relates to land use, growth, community impacts,
14 you know, biology, air quality, et cetera, noise. So
15 it's sort of the environment document at a glance, and
16 you get to see what has been eliminated over the years.
17 It shows a total of six alternatives.

18 So look at it and try to formulate a more
19 specific question. I kind of get the feeling that maybe
20 we are not really getting at what you want to get to,
21 but maybe if you look at the grid and sort of kind of
22 whittle down what you are trying to say, we will try to
23 definitely answer it.

24 MR. HAUSER: You said look at the grid. Where?

25 MR. AGUILAR: This grid is at the welcome table.

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1 If you don't have it, you can raise your hand.

2 AUDIENCE MEMBER: I have some.

3 MR. AGUILAR: And Caitlin will hand you one.

4 AUDIENCE MEMBER: I think the lady over here we
5 have a comment.

6 MS. DE LOZA: We encourage you to submit your
7 comments. As I mentioned, we have a comment table in
8 the back where you can submit your written comments.
9 The public comment period ends February 3rd, and we
10 encourage you to mail your comments. If you want to

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11 review the documents, there are copies, there are CDs of
12 the document at the welcome station, and if you want to
13 take a hard copy, I encourage you to submit a comment
14 form and in the comment section area that says I would
15 like a copy of the document. We will take one last
16 question, comment.

17 MR. HAUSER: I just wanted to make a statement.
18 You guys have been trying for 30 some years to put a
19 project in that stinks the place up. Why don't you just
20 drop it? Save the taxpayers some money. Just forget
21 this. What is it going to do? It stinks. Nobody wants
22 it in the neighborhood.

23 MS. DE LOZA: Thank you, Mr. --

24 MR. HAUSER: (Inaudible). After the 17th time
25 by --

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1 MS. DE LOZA: Thank you. Comment noted.

2 MR. HAUSER: I don't want to marry you. I have 17
3 times.

4 MS. DE LOZA: One last comment, one last question.
5 Can you please state your name for the record and take
6 the microphone, please?

7 This will be the last question of the night.
8 We are still going to be here until eight o'clock to
9 answer any questions in the open house setting, and we
10 would like you to please submit your comments in
11 writing. Two more.

12 MS. BURT: I actually did turn in a card, but it's
13 gotten lost in the shuffle. My name is Claydine Burt.
14 I have lived in this town since 1949. Sometimes when
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15 people look at my wrinkles and my white hair and realize
 16 how elderly I am, and I am elderly, I admit that, but
 17 that doesn't mean I'm objecting to change. I just think
 18 change should be efficient.

19 We need to remember that the Hollywood Park
 20 proposal is just that. It isn't set in stone. We also
 21 need to remember that that 105 originally was supposed
 22 to go into the airport, and if they ever finished that
 23 up -- and they are actually talking about it. Maybe you
 24 guys are talking about it. That's going to cause some
 25 disturbance as well.

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1 Another thing that we in Inglewood have to
 2 stop and think about -- and it may be something that you
 3 are interested in -- is the Crenshaw corridor. That's
 4 going to really involve a whole lot of stuff. They are
 5 going to move the railroad tracks. They are going to
 6 add pavement and roads beside the railroad tracks. And
 7 maybe it will hook up with your magic half of an
 8 interchange.

9 Let me suggest that the actual compact of that
 10 traffic a little bit north of Arbor Vitae. It's even a
 11 little bit north of Florence Avenue, but also I'd like
 12 you to know that we have a one-fourth interchange at
 13 Arbor Vitae and La Cienega. Thank you.

14 MS. DE LOZA: Thank you. Please state your name.

15 MS. CAREIO: My name is Cecil Careio. It's not
 16 really a comment but more of a couple of questions, and
 17 before this latest environment assessment was released
 18 there was one that came out in 2000 --

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Caltrans Response #34:

A. The additional trips from the Hollywood Park Casino Complex would have been included in the Phase II of the Traffic Analysis. However, since the proposed project will not be built, the Phase II of the Traffic Analysis will not be completed.

The City of Inglewood already had proposed to widen Arbor Vitae Street to four lanes to accommodate additional traffic from the Hollywood Park Redevelopment Project.

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19 MS. DE LOZA: 2000.

20 MS. CAREIO: And in that environmental assessment
21 it was stated that, in fact, one of the purposes of
22 having the project was to become part of the Los Angeles
23 International Airport's ring road. And I was curious as
24 to the difference between that half project and this
25 project of -- let me say it a different way.

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1 That environmental assessment and this one
2 that we now say it has nothing to do with the airport
3 when it was stated clearly in the 2000 report that it --
4 that's what part of it is for.

5 And then also, if you could, please, tell me
6 how the FHA, the Federal Highway Administration, is
7 working with you because I know that they were having a
8 difficult time approving a half project. So if I could
9 get answers to those two questions, I would appreciate
10 it.

11 MR. VASSILIADES: Thank you, I remember you, by the
12 way, ten years ago at the discussion meeting. Thank you
13 for coming over here and sharing your thoughts.

14 You spoke about the ring road that was
15 proposed ten years ago. Ten years ago the City of L.A.,
16 the Los Angeles road to LAX came out with a so-called
17 master plan to expand capacity at LAX. The level of
18 passengers flying through LAX airport in 2000 was about
19 70 million passengers per year. The proposed expansion
20 would have raised the number of passengers traveling
21 through LAX from 70 million to 90 million.

22 They came up with \$15 billion worth of
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23 improvement. They call this the LAX master plan. So
24 they came out with -- sorry. They came out at the
25 public hearing to sell it. At the time we were working

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1 together with LAX to figure out how to address the
2 increased need to commute back and forth through the LAX
3 area.

4 And one of the proposals was the ring road --
5 okay -- which actually utilized Arbor Vitae to go from
6 the 405 freeway to Arbor Vitae westbound, going around
7 LAX, the terminal and returning back through Century
8 Boulevard. What happened after the LAX master plan was
9 the September 11 incident when it was then decided to
10 scrub this proposal. It wasn't going anywhere, and they
11 figured out that there was a greater need to improve
12 safety than capacity at LAX.

13 Another plan came to build an interchange at
14 Lennox Avenue. Okay. It went through the environmental
15 review, but it was also scrapped. There was tremendous
16 opposition by groups like yours against expanding
17 capacity at LAX. But what we're trying to convey to you
18 today is that this is a different project.

19 We are not trying to expand or increase
20 capacity of passengers flying from and to LAX. We are
21 trying to make life easier for people who drive in cars
22 on the 405 freeway. That's all we are trying to do.
23 This is just a proposal. It's in an infant stage. If
24 we don't get an approval, it's not going to go anywhere.
25 We are neutral basically. We are

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1 professionals. We study a plan. We put it together.
2 We invite you to this podium over here so that you can
3 hear what you think about it, to give us your thoughts.
4 This is what we call the environmental process review.
5 With your help we are going to refine what we need to do
6 and try to deliver it.

7 If the community is opposed to it, it's not
8 going to go anywhere, just like the LAX expansion. But
9 please try to understand. Don't harm the future for
10 your community. We're trying to improve the quality of
11 life. There is nothing, absolutely nothing that
12 connects this project with the LAX.

13 MS. CAREIO: I appreciate your comment, but the
14 thing of it is that's exactly what I was asking. What
15 is the difference between the previous project and this
16 one because you said it has been changed, and I'm asking
17 what some of those differences are.

18 MR. VASSILIADES: Definitely, because one of the
19 conditions of the LAX master plan was to do the traffic
20 analysis, the traffic study. And for them to be able to
21 push for something viable, they had to come up with a
22 plan to impress the 20 million extra passengers going
23 through LAX.

24 Arbor vitae at the time, it was one of the
25 alternatives as well as the connector to the 105

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1 Freeway. There were many different proposals that had
2 been proposed to address the 20 million passengers. It

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 3 was just one single point of reference that was made to
 4 Arbor Vitae, but this was a separate project.

5 And this is what really destroyed our chances
 6 to deliver our project. Because all along since the
 7 '70s, since the late '70s, we have been trying to
 8 improve traffic congestion in and around the area for
 9 the sake of your community, and we couldn't do it.

10 MS. CAREIO: You say that, but what really happened
 11 was the Federal Highway Administration wouldn't put
 12 their sign up on it. And that was the --

13 MR. VASSILIADES: Part of the master plan, Arbor
 14 Vitae --

15 MS. CAREIO: No, sir. No, sir, I am sorry. I have
 16 to disagree with you, and I talked with FHA, and they
 17 would not approve that half project. That's why I'm
 18 asking you now, what did they see that now they have --
 19 that you are getting their blessing to do this half
 20 project? That's all I was asking.

21 MS. DE LOZA: Perhaps we can address that question
 22 in the final document.

23 MS. CAREIO: Okay. Thank you.

24 MS. DE LOZA: Thank you very much for coming
 25 tonight. I encourage you to follow up on Twitter. The

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 1 address there is move405 and on Facebook as well. We'll
 2 have information when the document is released. We will
 3 make sure we post that. Visit our website which is
 4 accessarborvitae.com.

5 Again, the public comment period ends February
 6 3rd, and we will take all comments written, and please

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Caltrans Response #35:

A. The South Half Interchange Proposal was rejected by the Federal Highways Administration on April 9, 2010.

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7 mail them to Mr. Ronald Kosinski who is the deputy
8 district director at CalTrans district 7. The address
9 is 100 South Main Street, Mail stop 16-A, Los Angeles,
10 California 90012, and that address is on all the comment
11 forms as well as your welcome sheet that you received
12 when you signed in. Thank you very much for attending.
13 We appreciate your coming out tonight.
14 MR. HAUSER: Can we have a show of hands? So how
15 many people think this project is wonderful and how many
16 think it sucks? Can you do that?
17 MS. DE LOZA: Sorry.
18 MR. VASSILIADES: Tuesday also.
19 MS. DE LOZA: Thank you very much for coming. We
20 will be available to answer questions until eight
21 o'clock in the evening.
22 MR. HAUSER: Thank you very much.
23 (Whereupon the proceedings concluded
24 at 7:39 p.m.)
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1 STATE OF CALIFORNIA }
2 COUNTY OF LOS ANGELES } ss:
3

4 I, NANJI L. GRUBE, do hereby certify:

5

6 That I am a duly qualified Certified Shorthand
7 Reporter, in and for the State of California, holder of
8 certificate number 3446, which is in full force and
9 effect and that I am authorized to administer oaths and
10 affirmations;

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11
12 That the foregoing public hearing was taken
13 before me at 120 west Regent Street, Inglewood,
14 California, commencing at 6:25 p.m., Tuesday,
15 January 19, 2010.

16
17 That the statements of the speakers and the
18 public statements and testimony were recorded
19 stenographically by me, and were thereafter transcribed
20 under my direction and supervision;

21
22 That the foregoing pages contain a full, true
23 and accurate record of the proceedings and testimony to
24 the best of my skill and ability;
25

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1 I further certify that I am not a relative or
2 employee or attorney or counsel of any of the parties,
3 nor am I a relative or employee of such attorney or
4 counsel, nor am I financially interested in the outcome
5 of this action.

6
7 IN WITNESS WHEREOF, I have subscribed my name
8 this ____ day of _____, ____.

9

10

11

12 _____
13 NANJI L. GRUBE, CSR No. 3446

13

14

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