

CITY OF LOS ANGELES  
INTERDEPARTMENTAL CORRESPONDENCE

Date: July 6, 2018

To: Lawrence Hsu, Division Engineer  
Metro Transit DivisionEdmond Yew, Division Manager  
Land Development & GIS DivisionFrom: Maria Martin, Manager *ME Martin*  
Environmental Management Group**Subject: California Environmental Quality Act (CEQA) Review: Summary of Relevant Findings and Mitigation Measures for La Cienega Blvd (Portion of) Southerly of Wrightcrest Dr (Airspace Vacation) E1401318**

The Environmental Management Group has reviewed the requested airspace vacation CEQA documentation. The relevant findings of the Revised Initial Study/Mitigated Negative Declaration (which has incorporated public review comments) and associated mitigation measures are summarized below:

**Phase 1:****Geology and Soils**

The Geotechnical Investigation has indicated that landsliding, ground subsidence, and ground lurching are unlikely if the project is built in accordance with current regulatory codes. The proposed trail improvements would be built to current engineering standards and would not create or exacerbate geologic hazards to adjacent developments due to the limited size and type of trail improvements and distance from adjacent developments. To ensure the structural integrity of the pedestrian bridge, it may utilize caissons or piles for foundation support, depending on the soil characteristics at the bridge landings.

**Impacts**

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-55, 1-12.

**Mitigation Measures**

**RR 4.6-2** In compliance with the California Building Code, the Alquist-Priolo Earthquake Fault Zoning Act, and the Seismic Hazards Mapping Act, a project-specific geotechnical investigation shall be conducted to identify geologic and seismic hazards where structural elements and structures would be constructed and to provide detailed geotechnical design parameters, safety factors, and recommendations to be incorporated into the project plans. The recommendations of the geotechnical report shall be used in the engineering design and construction of proposed structures.

### **Hazards and Hazardous Materials**

The site is not listed in government databases as a hazardous materials user / generator subject to clean up activities. Trail improvements proposed on Segment C would include a hiking trail, a pedestrian bridge, signs, kiosks / panels, CMU wall, retaining walls, relocated access road, fencing, trash receptacles, and landscaping / revegetation. Measures to avoid health hazards associated with exposure to the arsenic and petroleum hydrocarbon containing-soils would have to be implemented by the project.

The reported concentrations of total petroleum hydrocarbons (TPH) are generally below the concentrations that would require cleanup by a regulatory agency; these soils may present a soil management issue if the material is to be exported offsite for disposal. The disposal of TPH-impacted soil is generally regulated by the disposal facility's permit and acceptance criteria. The contractor's Health and Safety Plan shall include soil management practices, including compliance with the disposal requirements imposed by the disposal facility (MM 4.8-2). This MM shall be implemented during the construction of both phases of Segment C.

### ***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-69 - 4-70, 1-14.

### **Mitigation Measures**

**MM 4.8-2** The Contractor shall prepare and implement a Health and Safety Plan that includes protocols for environmental and personnel monitoring, requirements for personal protective equipment, other appropriate health and safety protocols, and procedures for the handling and disposal of arsenic and petroleum hydrocarbon containing-soils, based on the findings of the Limited Soil Sampling Report by Geocon (dated October 13, 2015).

### **Noise**

Noise from project construction would be heard at nearby residences. The closest sensitive noise receptors at Wright Terrace and Stoneview Drive are 50 to 75 feet from locations where equipment would be operated. At any receptor, the maximum noise levels from construction equipment would occur intermittently and occasionally because the equipment would be at the closest point for only short periods. Average noise levels, Leq, at sensitive receptors are not anticipated to exceed the County's Noise Ordinance limit of 75dBA at single-family residences. Further, construction equipment noise at individual receptors would be limited to those periods when the equipment is used in the vicinity of the receptors. Construction activities would also be limited to the hours defined by the Cities of Los Angeles and Culver City and the County of Los Angeles municipal codes.

***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-103, 1-16.

**Mitigation Measures**

**RR 4.12-1** Project construction shall comply with the most restrictive time limits and other applicable noise regulations of the City of Culver City, and County of Los Angeles municipal codes. Construction using any equipment that makes loud noises that would disturb persons in nearby residences (including the operation, repair, or servicing of construction equipment and the jobsite delivering of construction materials) shall be limited to the hours of 8:00 AM to 7:00 PM, Monday through Friday, and from 9:00 AM to 6:00 PM on Saturday. No construction shall be allowed on Sundays or holidays without a permit.

**Phase 2:**

**Aesthetics**

The proposed pedestrian bridge has the potential to change the visual character of the area around La Cienega Boulevard as the bridge would be visible from the KHSRA, La Cienega Boulevard, the Inglewood oilfield, and adjacent residences. Lighting of the trail and pedestrian bridge is not planned since it would not be in use from sunset to 8:00 AM of the following day for the western portion and from sunset to 6:00 AM of the following day for the eastern portion. Installation of new light sources on the pedestrian bridge and trail in Phase 2 may be necessary for security and safety purposes. While there are existing streetlights on La Cienega Boulevard that characterize lighting levels in the area, any new light sources from the proposed trail and pedestrian bridge have the potential to increase nighttime lighting levels and adversely affect residents in dwelling units that have windows facing east to La Cienega Boulevard and south to Segment C.

***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-7, 1-19.

**Mitigation Measures**

**MM 4.1-1** Any new light sources be provided at the minimum levels to meet security purposes; be directed downward and away from adjacent residential areas; and be shielded, diffused, or indirect to prevent spillover into adjacent properties. Also, no flashing, flickering, rotating, or moving lights shall be used. The design-build contractor

shall provide data or studies to support compliance with this mitigation measure, which would be verified by the County during the plan check process.

**MM 4.1-2** The design-build contractor shall ensure that exterior bridge finishes that are made of glass, metals or mirrors are painted, tinted and/or textured so as not to cause glare or flash blindness that could adversely affect the vision of motorists on La Cienega Boulevard and on surrounding roads and of residents in adjacent dwelling units.

### **Biological Resources**

Use of night time lights may affect natural habitat areas.

### ***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 1-21.

### **Mitigation Measures**

**MM 4.4-6** The design-build contractor shall ensure that night lighting, if utilized along the proposed trail, shall be kept to the minimum necessary for public safety. Night lighting shall be directed downward away from adjacent habitat areas and shielding would be incorporated into the lighting design to minimize the increase in ambient light in adjacent areas.

### **Cultural Resources**

Areas that remain largely undisturbed could still contain archaeological resources. Fossil material could be encountered during the excavation activities for construction of the proposed walls, and bridge. Lastly, previous ground disturbance activities for the construction of existing developments and infrastructure near the site, as well oil production activities at the site, would have uncovered human remains if they are present. Thus, the alignment of Segment C is not expected to contain human remains, and the proposed trail would have no potential to disturb human remains.

### ***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-46 – 4-47, 1-22 – 1-23.

### **Mitigation Measures**

**MM 4.5-1** Prior to and during construction activities, an Archaeologist shall be present at the pre-grade conference; shall establish procedures for archaeological resource surveillance; and shall establish, in cooperation with the County and BHRCA, procedures for temporarily halting or redirecting work to permit the sampling,

identification, and evaluation of artifacts, as appropriate. The Archaeologist shall monitor ground disturbance in native alluvial sediments and areas where excavation is proposed to be more than 1 foot deep. If archaeological and/or tribal cultural resources are found to be significant, the Archaeologist shall determine appropriate actions, in cooperation with the County and BHRCA, for exploration and/or salvage. Work may proceed in other areas, subject to the direction of the Archaeologist, in cooperation with the County and BHRCA.

For any archaeological resource found during ground-disturbing activities, the Archaeologist shall first determine whether it is a "unique archaeological resource" pursuant to Section 21083.2(g) of the *California Public Resources Code* (PRC) or a "historical resource" pursuant to Section 10564.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a mitigation plan in consultation with the BHRCA that satisfies the requirements of the above-referenced regulations. If the Archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource", s/he may record the site and submit the recordation form to the California Historic Resources Information System at the South Central Coastal Information Center at California State University, Fullerton.

**MM 4.5-2** During grading and excavation activities, if fossil resources are discovered by the Archaeologist or Archaeological Monitor, Project Engineer, or other parties, ground-disturbing activities in the vicinity of the discovery shall be halted or diverted until a qualified Paleontologist inspects the find and evaluates its significance. Work may proceed in other areas, subject to the direction of the Paleontologist. If determined significant, the Paleontologist shall have the authority to quickly and efficiently salvage and remove the fossil from its locality, as appropriate, before ground-disturbing activities resume in the area. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the BHRCA.

#### **Hazards and Hazardous Materials**

The site is not listed in government databases as a hazardous materials user / generator subject to clean up activities. Trail improvements proposed on Segment C would include a hiking trail, a pedestrian bridge, signs, kiosks / panels, CMU wall, retaining walls, relocated access road, fencing, trash receptacles, and landscaping / revegetation. Measures to avoid health hazards associated with exposure to the arsenic and petroleum hydrocarbon containing-soils would have to be implemented by the project.

The reported concentrations of total petroleum hydrocarbons (TPH) are generally below the concentrations that would require cleanup by a regulatory agency; these soils may present a soil management issue if the material is to be exported offsite for disposal. The disposal of TPH-impacted soil is generally regulated by the disposal facility's permit and acceptance criteria. The contractor's Health and Safety Plan shall include soil management practices, including compliance with the disposal requirements imposed

by the disposal facility (MM 4.8-2). This MM shall be implemented during the construction of both phases of Segment C.

***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-69 -4-70, 1-25 – 1-26.

**Mitigation Measures**

**MM 4.8-1** All construction crew shall wear Flame Resistant Clothing (“FRC”) with a Hazard / Risk Category (“HRC”) rating of 1, steel toe boots, hard hats, and safety glasses during construction activities at the site, as may be required by FM O&G.

**MM 4.8-2** The Contractor shall prepare and implement a Health and Safety Plan that includes protocols for environmental and personnel monitoring, requirements for personal protective equipment, other appropriate health and safety protocols, and procedures for the handling and disposal of arsenic and petroleum hydrocarbon containing-soils, based on the findings of the Limited Soil Sampling Report by Geocon (date October 13, 2015).

**MM 4.8-3** If stained, discolored and/or odorous soils are encountered during grading or excavation activities, work in the immediate area shall cease and the design-build contractor shall have a sample of the soils analyzed for the presence of contamination. If the results of the testing show that chemical levels are present below regulatory levels, grading and excavation activities may proceed accordingly. Otherwise, remediation and / or removal of the contaminated soils shall be completed prior to continued ground disturbance if chemical levels are above regulatory standards. Remediation and / or disposal shall be conducted with the oversight of applicable regulatory agencies such as the Los Angeles County Fire Department [operating as the CUPA], the South Coast Air Quality Management District (SCAQMD), the California Department of Toxic Substances Control (DTSC), and / or the U.S. Environmental Protection Agency and in compliance with established maximum contaminant levels (MCLs).

**MM 4.8-4** The design-build contractor shall consult and be required to seek approval from authorities having jurisdiction, including the California Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board (LARWQCB) and/or the County Fire Department’s Health Hazardous Materials Division (HHMD) Site Mitigation Unity (SMU), as appropriate. As part of the approval / permit process, the design-build contractor shall comply with the conditions of approval or permit requirements of these agencies.

### **Noise**

Noise from project construction would be heard at nearby residences. The closest sensitive noise receptors at Wright Terrace and Stoneview Drive are 50 to 75 feet from locations where equipment would be operated. At any receptor, the maximum noise levels from construction equipment would occur intermittently and occasionally because the equipment would be at the closest point for only short periods. Average noise levels,  $L_{eq}$ , at sensitive receptors are not anticipated to exceed the County's Noise Ordinance limit of 75dBA at single-family residences. Further, construction equipment noise at individual receptors would be limited to those periods when the equipment is used in the vicinity of the receptors. Construction activities would also be limited to the hours defined by the Cities of Los Angeles and Culver City and the County of Los Angeles municipal codes.

### **Impacts**

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-103, 1-28 – 1-30.

### **Mitigation Measures**

**MM 4.12-1** As part of construction activities, the contractor shall implement the following:

- d. All construction vehicles or equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Mufflers shall be equivalent to or of greater noise reducing performance than the manufacturer's standard.
- e. Stationary equipment, such as generators and air compressors, shall be located as far from residences and parks as feasible. Where stationary equipment must be located within 250 feet of a residence, the equipment shall be equipped with appropriate noise-reduction features (e.g., silencers, shrouds, or other devices) to limit the equipment noise at the sensitive receptor to an average noise level ( $L_{eq}$ ) of 65 A-weighted decibels (dBA).
- f. Equipment maintenance, vehicle parking, and material staging areas shall be located as far away from local residences, as feasible.

**MM 4.12-2** If nighttime or Sunday work for pedestrian bridge construction is necessary to avoid lane closures on La Cienega Boulevard during the daytime hours from Monday to Saturday, the design-build contractor shall obtain a permit for nighttime or Sunday construction work from the County Engineer per Section 12.12.050 of the Los Angeles County Code. The design-build contractor shall also request permissions from the Cities of Culver City and Los Angeles for any nighttime and Sunday work. In addition,

the noisiest activities (as associated with the construction of bridge foundations and ramps) shall be scheduled, to the extent feasible, between 8:00 AM and 7:00 PM, Monday through Friday and from 8:00 AM to 6:00 PM on Saturdays. Otherwise, noise barriers, equipment enclosures, hospital-grade mufflers and/or other noise reduction measures shall be provided between the noise source and the adjacent residences to ensure that noise from construction activities do not exceed the County's standards for noise levels at residential areas, as generated by mobile and stationary equipment during the hours of 7:00 PM to 8:00 AM on weekdays; from 6:00 PM to 8:00 AM on Saturdays; and all day on Sunday and legal holidays.

**MM 4.12-3** If caissons or piles are required for the pedestrian bridge foundations, prior to the granting of a building permit, the design-build contractor shall provide a vibration analysis prepared by a registered professional engineer. The vibration analysis shall demonstrate that construction methods to be used would not cause structural damage or substantial annoyance at nearby residences. Criteria for determining impact shall be based on the California Department of Transportation's Transportation and Construction Vibration Guidance Manual, the Federal Transit Administration's Transit Noise and Vibration Impact Assessment or similar accepted authority for vibration impacts. In conditions of conflict, the most stringent regulation shall govern.

**MM 4.12-4** The design-build contractor shall inform and coordinate construction timing with FM O&G to avoid construction of Segment C during any time that drilling operations are ongoing near the proposed trail. If simultaneous construction and drilling activities would occur, arrangements shall be agreed upon so that the cumulative noise levels do not exceed applicable noise regulations and adversely affect adjacent residents.

**MM 4.12-5** the design-build contractor shall inform FM O&G in advance of planned caisson or pile driving activities so that FM O&G's ground movement monitoring program can account for any additional ground movement noted during the times when the caissons or piles for the pedestrian bridge are being driven.

#### **Transportation / Traffic**

The intersections on La Cienega Boulevard near the site currently operate at LOS E and F during the AM and PM peak hours. Thus, any temporary or partial closure of lanes on La Cienega Boulevard would further degrade traffic operations. Any potential lane closures should be implemented during nighttime or weekend hours as indicated in mitigation measure MM 4.16-1 below.

The proposed pedestrian bridge under Phase 2 of the project may pose a limitation to the height of vehicles passing underneath the bridge, and consequently present safety hazards to vehicles on La Cienega Boulevard and to trail users on the bridge. The Federal Highway Administration (FHWA) sets the minimum vertical clearance for freeways and arterial roadways to be 14 to 16 feet, with 17 feet for sign trusses and pedestrian overpasses (FHWA 2014). In order to avoid traffic hazards to vehicles on La

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Cienega Boulevard, the project would need to comply with FHWA guidelines, as stated under RR 4.16-3. This RR shall be implemented during Phase 2 of the project.

***Impacts***

Less than significant after mitigation.

**Reference:** Revised Initial Study / Mitigated Negative Declaration, pg. 4-123, 4-127, 1-31.

**Mitigation Measures**

**RR 4.16-3** In order to avoid the creation of traffic hazards to vehicles on La Cienega Boulevard, the proposed pedestrian bridge shall have a vertical clearance of at least 17 feet, in accordance with Federal Highway Administration (FHWA) guidelines.

**MM 4.16-1** Any temporary and/or partial closure of travel lanes on La Cienega Boulevard shall be scheduled during the nighttime hours from 9 PM to 6AM of the following day or on Saturdays or Sundays.

If you have any questions or require additional information, please contact Billy Ho of my staff at (213) 485-5745.

MEM/bh

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