



City of Malibu

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June 1, 2017

Mr. Ron Kosinski
Deputy District Director
California Department of Transportation
Division of Environmental Planning
100 S. Main Street, MS 16-A
Los Angeles, CA 90012

**SUBJECT: DRAFT INITIAL STUDY/ENVIRONMENTAL ASSESMENT (IS/EA) FOR THE TRANCAS CREEK
BRIDGE REPLACEMENT PROJECT
REVIEW COMMENTS**

Dear Mr. Kosinski,

Thank you for providing the City of Malibu the opportunity to submit comments regarding the Draft Initial Study/Environmental Assessment (IS/EA) for the Trancas Creek Bridge Replacement Project. The City's comments are attached.

In general, the City's comments focus on flood risk and pedestrian, sidewalk, parking, transit, and bike lane improvements. However, as you are aware, the City is particularly concerned with pedestrians dangerously crossing Pacific Coast Highway (PCH) in this area. Since Caltrans is aware of this condition, designing the new bridge with a pedestrian undercrossing leading to Zuma Beach would easily eliminate this existing unsafe condition. This simple design would include a sidewalk on the land side of PCH extending from the intersection of Trancas Canyon Road to a pedestrian undercrossing at the new bridge. The undercrossing would connect to a sidewalk on the ocean side of PCH where it would safely lead visitors towards Zuma Beach. This design would be similar to the existing pedestrian undercrossing that Caltrans installed at Topanga Beach. Including a pedestrian undercrossing with this project would be simple and greatly improve pedestrian safety in this heavily congested area of PCH. However, not including a pedestrian undercrossing would clearly neglect the safety of the millions of people that annually visit Malibu and Zuma Beach.

In addition, the installation of a northbound right-turn lane at the intersection of Trancas Canyon Road and PCH extending from the proposed new bridge is severely needed for this project. As you may be aware, the average speed of vehicles traveling northbound is between 50-60 mph and any sudden deceleration for vehicles turning right on Trancas Canyon Road is a contributing factor to



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rear-end collisions at this intersection. Please also note that in accordance with the California's "Complete Streets Policy" that was effective in 2008, as a matter of law, Caltrans is required to accommodate all modes of travel in their designs which includes parking, sidewalks, bike lanes, transit, and right turn lanes. Although Caltrans neglected to include this much needed northbound right turn lane during the previous development of the Trancas Country Mart project, it is imperative that Caltrans does not let this happen again.

Lastly, the City was very surprised, but equally disappointed, to hear from residents attending the May 25, 2017 public hearing that they were not given proper notice by Caltrans that their property may be acquired for the right-of-way. Please note that all the work to improve the bridge should be performed within the existing Caltrans right-of-way and that the City strictly opposes and will not support any property acquired by eminent domain.

In closing, the City appreciates the opportunity to comment on the Draft IS/EA before it is finalized and looks forward to receiving your responses to the City's concerns.

If you have any questions or require further clarification, please contact me at (310) 456-2489 ext. 247 or bbrager@malibucity.org.

Sincerely,



Robert L. Brager, PE, JD
Public Works Director/City Engineer/Floodplain Administrator

Enclosure

cc:

Reva Feldman, City Manager
Bonnie Blue, Planning Director
Stephanie Hawner, Senior Planner
Rob Duboux, Assistant Public Works Director
Jorge Rubalcava, Assistant Civil Engineer

Trancas Creek Bridge Replacement Project IS/EA (Public Works Comments)

1. **Section S.2 Page S-1** is misleading. It appears that Caltrans will install a Class II bike lane based on the following: “The project will also promote multimodal transportation through the incorporation of a Class II bike lane”. However, a bike lane on the ocean side of PCH already exists which was installed by the City of Malibu 2015 as stated in the report in **Chapter 1 Section 1.2 Page 1-7**. Please revise this statement.
2. **Section S.3 Page S-2:** Alternative 3 proposes a longer bridge which appears to accommodate the desires of the Natural Conservancy Organization or the Trancas Lagoon Restoration Project, as stated in **Chapter 1 Section 1.3.1.3 Page 1-9**. Transportation funds shall not be used on non-transportation projects. This violates the concept of “color of money”. The Trancas Lagoon Restoration should be a separate project in its entirety as stated in **Chapter 2 Section 4(f)/CFR, Title 23, Part 774, Page 2-21**. Please make it clear in this document that Caltrans will not use transportation funds to support non-transportation related portions of this project.
3. **Chapter 1 Section 1.3 Page 1-8** states that the center median will be reduced to a 6.5’ width. In an effort to reduce the amount of right-of-way being acquired from private properties, shouldn’t Caltrans first investigate utilizing more of the center median space?
4. **Chapter 1 Section 1.3 Page 1-8** proposes 11’ wide standard lanes. This information is incorrect. Standard width lanes are 12’, not 11’. Caltrans has required the City in previous transportation projects on PCH to use standard 12’ lanes. Installing 11’ lanes will make a portion of the highway non-standard. Please clarify and be consistent.
5. **Chapter 1 Section 1.3 Page 1-8:** It appears that Caltrans will accommodate and install a 6’ wide bike lane. However, a bike lane on the southbound side of PCH already exists which was installed by the City of Malibu in 2015 as stated in the report in **Chapter 1 Section 1.2 Page 1-7**. Please revise. Also, see item 1 above.
6. **Chapter 1 Section 1.3 Page 1-8:** Please clearly show and specifically state which properties Caltrans proposes to acquire in this project. **Figure 2.7 of Chapter 2 Section 2.2.2.4 Page 2-31** does not depict this intent. The City strictly opposes and will not support any property acquired by eminent domain.
7. **Chapter 1 Section 1.3.1.2 Page 1-8:** According to this section of the report, the design storm event for the bridge accommodates the 50-year storm event. However, **Chapter 2 Table 2.7 and Section 2.7.3.2**, uses the 100-year storm event. This is contradicting information. Also, the hydrologic and hydraulic calculations shall be in conformance with FEMA’s new Base Flood Elevation and FEMA’s Preliminary Maps which are currently under revision. As such, the correct design storm event used shall be for a 100-year storm event not a 50-year storm event. Please clarify.



8. **Chapter 2 Section 2.1.2.2 Page 2-14:** Since this project will require road closures, please clearly specify the detour routes and times.
9. **Chapter 2 Section 2.2.2.2 Page 2-31:** Please replace the word “Gurney” with the correct street name “Guernsey”.
10. **Chapter 2 Section 2.2.2.2 Page 2-31:** The referenced commercial property with businesses is located northwest of the bridge, not northeast. Please revise.
11. **Chapter 2 Section 2.2.2.3 Page 2-31 Alternatives 2 and 3** are confusing. Please clearly specify which vacant lot is being addressed or considered. Is the report referring to the land side of the bridge or the ocean side of the bridge? Per the May 25, 2017 meeting at Malibu West Beach Club, it is unclear how the properties identified in the report will be affected. Please clarify.
12. **Chapter 2 Section 2.2.2.4 Page 2-31 and Figure 2-7** depicts the partial acquisition of real property. During the May 25, 2017 meeting at Malibu West Beach Club, attending homeowners seemed to be unaware of Caltrans’ proposed plans to acquire portions of their property. Have all affected property owners been properly notified? Please note that the City strictly opposes and will not support any property acquired by eminent domain.
13. **Chapter 2 Section 2.4.2.2 Table 2.6 Page 2-50:** It is not clear of the actual location of these accidents on PCH. Also, how many accidents occurred at the intersection of PCH and Trancas Canyon Road? Please clarify.
14. **Chapter 2 Section 2.4.4 TT-2** states that two open lanes will be maintained to the traveling public during peak hours. What happens during non-peak hours? Will the two open lanes remain open? Please clarify.
15. **Chapter 2 Table 2.7 Page 2-63** depicts a table with summarized calculations for the 100-year storm event. **Chapter 1 Section 1.3.1.2 Page 1-8** describes how the 50-year storm event will be accommodated. This is contradicting information. Please revise.
16. **Chapter 2 Table 2.7 Page 2-69** shows a vertical clearance of 1.9-ft. Please provide a standard minimum 2-ft of vertical clearance/freeboard.
17. **Chapter 2 Section 2.7.3.2 Page 2-69:** Provide a copy of the Final Hydraulic Report.
18. **Chapter 2 Section 2.7.3.2 Page 2-70** states that most of the project area is in Zone X. Although this may be true, please note the actual bridge structure is entirely in the AE zone. Please clarify.
19. **Chapter 2 Table 2.78 Page 2-71** shows a vertical clearance of 0.4-ft. Please provide a standard minimum 2-ft vertical clearance/freeboard.
20. **General Comment:** Provide a bike lane on the land side of PCH.

21. **General Comment:** Provide enough width for parking and transit on both sides of PCH.
22. **General Comment:** Provide a sidewalk for pedestrians on the land side of PCH from Trancas Canyon Road to the proposed new bridge that would contain a pedestrian undercrossing. The pedestrian undercrossing would then be connected to a sidewalk on the south side of PCH that leads to Zuma Beach; similar to the undercrossing located at Topanga Canyon Road and PCH.
23. **General Comment:** The proposed bridge wing walls shall have enough riprap protection on both the northwest and northeast sides to ensure the structural integrity of the bridge.
24. **General Comment:** Please ensure that a northbound right-turn lane at the intersection of Trancas Canyon Road and PCH is included in this project. The average speed of vehicles traveling northbound is between 50-60 mph and sudden deceleration for northbound vehicles turning right on Trancas Canyon Road have been a contributing factor in rear-end collisions at that intersection.
25. **General Comment:** Will the location of any existing septic systems be affected by the acquisition of property? Please investigate and confirm.

Trancas Creek Bridge Replacement Project IS/EA (Planning Department Comments)

1. Figures 2-6 and 2-7 illustrate permanent and temporary acquisition areas. Any private property southwest of the project site shall be identified and information should be provided as to whether a partial or entire take of those properties is proposed based upon the short bridge and long bridge alternatives.
2. Table S.1 Summary of Potential Project Impacts. The statements concerning –
 - Community Character and Cohesion should be modified to reflect that the build alternative WILL encroach on or affect.... Remove the word ~~No~~ preceding Adverse. Statement should read ADVERSE impacts to community character and cohesion are expected.
 - Relocations and Real Property Acquisitions should include in the mitigation measures the address and APN of the affected parcels.
 - Visual should be modified to reflect in VIS-2 that the City of Malibu, not the California Coastal Commission, is the approving body for the proposed scope of work and that the bridge railing design must be approved by the City through the CDP process.
 - Natural Communities should be modified to reflect that the City of Malibu, not the California Coastal Commission, is the approving body for the proposed scope of work.
3. Section 2.5.3.2 should be modified to reflect that the City of Malibu, not the California Coastal Commission, is the approving body for the proposed scope of work. City of Malibu retains jurisdiction of the processing and issuance of the Coastal Development Permit for the proposed project.

4. Individual notices specific to those property owners whose property may be acquired for the right of way, either permanently or temporarily, should be notified and allowed time to comment prior to adoption of the final CEQA/NEPA document.
5. The City conceptually supports a bridge design that accommodates a pedestrian undercrossing and lagoon restoration. Without a more detailed design that demonstrates all impacts, including the extent of acquisition of private property for right of way improvements, the City cannot fully evaluate the project or provide complete comments at this time.
6. Page 2-16, Paragraph 2, under the Local Coastal Program section, should be revised to reflect that City has a complete General Plan and a Certified LCP, including an LUP and LIP. The City's zoning ordinance is also complete. See Section 2.13.1.2 of IS/EA.
7. Table 2.3
 - a. Should be modified to reflect that the Chapters being referenced are from the Malibu Local Implementation Plan, which provides the development standards and regulations that implement the policies of the Malibu Land Use Plan. Policy Chapters are the in the Malibu Land Use Plan.
 - b. The discussion regarding LIP Chapter 4 (ESHA) references DSRA. The Malibu LIP does not include a disturbed sensitive resource status. The determination regarding the extent of ESHA will be made by the City Biologist as part of the CDP process, and the project will be conditioned as required by the Malibu LCP.
8. Section 2.2.2.2.
 - a. Affected environment states that all build alternatives will require a partial take of an adjacent real property. Identify the address and APN of affected parcels.
 - b. Include that there are private homes southwest of the project at the mouth of the creek on the ocean side of the bridge. The commercial properties are northwest of the project site.
 - c. Under Alternatives 2 and 3, correct text to reflect APN 4469-045-001 is northwest of the bridge. Identify 30708 PCH and any other private property southwest of the bridge that will be affected and the extent of the impact.
9. Overall, document is internally inconsistent in how it references direction, which is confusing to the reader. Recommended terms such as upcoast/downcoast and inland/seaward would clarify.
10. Section 2.5.2 should be revised to reflect that Malibu LUP Chapter 6, Section 6.3 provides that PCH is a designated scenic road, and Section 6.4 provides that places on, along, within, or visible from scenic roads, trails, beaches, parklands and state waters that offer scenic vistas of the beach and ocean, coastline, mountains, canyons and other unique natural features are considered Scenic Areas and subject to development standards.
11. Section 2.19.13 Item CI-13 should be modified to reflect the allowed hours for construction as provided for in Malibu Municipal Code Section 8.24.050(G) – Construction: operating or causing the operation of any tools, equipment, impact devices, derricks or hoists used in construction, chilling, repair, alteration, demolition or earthwork, on weekdays between the hours of seven p.m. and seven a.m., before eight a.m. or after five p.m. on Saturday, or at any time on Sundays or holidays, except as provided in Section 8.24.060(D).



12. Sea Level Rise must be addressed and evaluated by a Coastal Engineer.

- a. Malibu LIP Chapter 10, Section 10.4(A) and Malibu LUP Policy No. 4.22 require that the siting and design of new shoreline development and shoreline protective devices take into account anticipated future changes in sea level. In particular, an acceleration of the historic rate of sea level rise shall be considered and its potential impact on beach erosion, shoreline retreat, and bluff erosion rates shall be evaluated.
- b. Malibu LUP Chapter 4, Policy No. 4.16 provides that 4.16 All applications for new development on a beach, beachfront or blufftop property shall include a wave uprush and impact report and analysis prepared by a licensed civil engineer with expertise in coastal engineering which addresses and demonstrates the effects of said development in relation to the following: The profile of the beach; Surveyed locations of mean high tide lines acceptable to the State Lands Commission; The area of the project site subject to design wave uprush; Foundation design requirements; The need for a shoreline protection structure over the life of the project; The long term effects of proposed development on sand supply; and Future projections in sea level rise.

