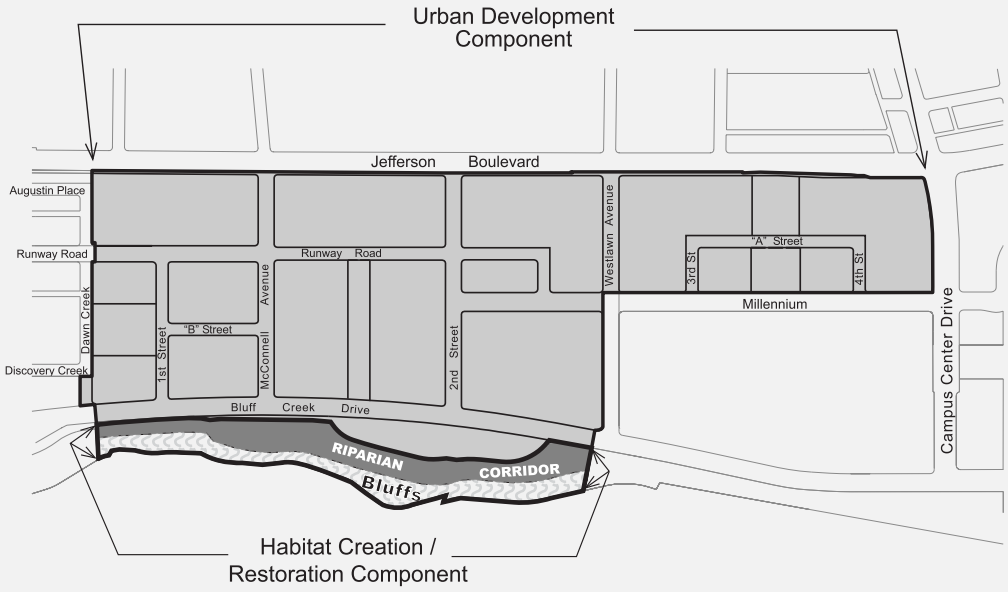
RECIRCULATED SECTIONS
OF
DRAFT ENVIRONMENTAL IMPACT REPORT
(RS-DEIR)

VILLAGE AT PLAYA VISTA



VOLUME II

TECHNICAL APPENDICES A to D.vii

City of Los Angeles/EIR No. ENV-2002-6129-EIR

2009

STATE CLEARINGHOUSE NO. 2002111065

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RECIRCULATED SECTIONS - DRAFT ENVIRONMENTAL IMPACT REPORT (RS-DEIR)

VILLAGE AT PLAYA VISTA

TECHNICAL APPENDICES

VOLUME II

APPENDIX A: COURT DOCUMENTS

APPENDIX B: LAND USE

APPENDIX C: PUBLIC UTILITIES: WASTEWATER

APPENDIX D: CULTURAL RESOURCES: ARCHAEOLOGICAL RESOURCES

City of Los Angeles
EIR No. ENV-2002-6129-EIR

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TABLE OF CONTENTS

VOLUME II
APPENDICES

A. Court Documents

i. September 13, 2007 Court of Appeal Opinion, consolidated cases of City of Santa Monica v. City of Los Angeles (B189630) and Ballona Ecosystems Education Project v. City of Los Angeles (B189722)

ii. May 23, 2008 Superior Court Order, consolidated cases of City of Santa Monica v. City of Los Angeles (BS093502) and Ballona Ecosystem Education Project v. City of Los Angeles (BS093507)

B. Land Use

i. Area D Specific Plan, as amended by Ordinance No. 170,785, Effective January 13, 1996

ii. Proposed Amendments to Area D Specific Plan, Ordinance No. _____

iii. Proposed Development Agreement

C. Public Utilities: Wastewater

i. Village at Playa Vista Sewer Research, Psomas & Associates, January 23, 2009

ii. Analysis of Wastewater Issues Regarding Village at Playa Vista Project and Hyperion Service Area Wastewater Flows, CH2MHill, November 11, 2008

iii. Technical Report on Cumulative Wastewater Impacts, MBC Applied Environmental Sciences and Flow Science, Inc., December 4, 2008

iv. Waste Discharge Requirements and Authorization to Discharge Under the National Pollutant Discharge Elimination System for the City of Los Angeles (Hyperion Treatment Plant), Order No. R4-2005-0020, NPDES Permit No. CA0109991, California Regional Water Quality Control Board, Los Angeles Region and U.S. Environmental Protection Agency, Region IX, Revised April 7, 2005

D. Cultural Resources: Archaeological Resources

i. Analysis for Alignments of the Riparian Corridor Through the Village at Playa Vista to Preserve in Place Archaeological Resources, Psomas and Associates, April 2008

ii. Assessment of Preservation in Place of Archaeological Resources (CA-LAN-62 Locus D and CA-LAN-211) in Proposed Village at Playa Vista Project, Statistical Research, Inc., April 2008

iii. Summary of Remedial Activities in Area D2 of Playa Vista Site, CDM, April 28, 2008

iv. The Village at Playa Vista Riparian Corridor Biological Resources Report, Psomas, April 2008

v. Surface Water Quality Assessment of Potential Alignments of the Riparian Corridor Through the Village at Playa Vista to Preserve in Place Archaeological Resources, Geosyntec, May 2008

vi. Programmatic Agreement

vii. Letter to Playa Vista regarding the Programmatic Agreement extension, October 30, 2001

APPENDIX A:
COURT DOCUMENTS

APPENDIX A.i:
SEPTEMBER 13, 2007 COURT OF APPEAL OPINION, CONSOLIDATED CASES OF CITY OF SANTA MONICA V. CITY OF LOS ANGELES (B189630) AND BALLONA ECOSYSTEMS EDUCATION PROJECT V. CITY OF LOS ANGELES (B189722)

Filed 9/13/07 City of Santa Monica v. City of Los Angeles CA2/3

NOT TO BE PUBLISHED IN THE OFFICIAL REPORTS

California Rules of Court, rule 8.1115(a), prohibits courts and parties from citing or relying on opinions not certified for publication or ordered published, except as specified by rule 8.1115(b). This opinion has not been certified for publication or ordered published for purposes of rule 8.1115.

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
DIVISION THREE

CITY OF SANTA MONICA et al., Plaintiffs and Appellants, v. CITY OF LOS ANGELES, Defendant and Respondent; PLAYA CAPITAL COMPANY, LLC, Real Party in Interest and Respondent.	B189630 (Los Angeles County Super. Ct. No. BS093502)
BALLONA ECOSYSTEM EDUCATION PROJECT, Plaintiff and Appellant, v. CITY OF LOS ANGELES et al., Defendants and Respondents; PLAYA CAPITAL COMPANY, LLC, Real Party in Interest and Respondent.	B189722 (Los Angeles County Super. Ct. No. BS093507)

APPEALS from a judgment of the Superior Court of Los Angeles County, William F. Highberger, Judge. Reversed with directions.

Marsha Jones Moutrie, Santa Monica City Attorney, and Joseph Lawrence, Assistant City Attorney, for Plaintiff and Appellant City of Santa Monica.

Law Offices of Sabrina Venskus and Sabrina Venskus for Plaintiffs and Appellants Ballona Wetlands Land Trust, Anthony Morales and Surfrider Foundation.

Law Offices of Brian Acree and Brian Acree for Plaintiff and Appellant Ballona Ecosystem Education Project.

Rockard J. Delgadillo, Los Angeles City Attorney, Susan D. Pfann, Assistant City Attorney, and Mary J. Decker, Deputy City Attorney, for Defendants and Respondents.

Latham & Watkins, Robert D. Crockett, Damon P. Mamalakis and Courtney E. Vaudreuil for Real Party in Interest and Respondent.

City of Santa Monica, Ballona Wetlands Land Trust, Anthony Morales, and Surfrider Foundation (collectively Petitioners) and Ballona Ecosystem Education Project (BEEP) challenge the certification by City of Los Angeles (City) of an environmental impact report (EIR) and the City's approval of phase two of the Playa Vista development project. They appeal a judgment denying their petitions for writ of mandate in two consolidated cases. Petitioners challenge the adequacy of the EIR and the City's findings under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) with respect to historical archaeological resources, methane gas, wastewater, transportation, and alternatives to the project. BEEP challenges the adequacy of the EIR as to its project description and also challenges the EIR and the City's findings with respect to land use, transportation, project alternatives, and the statement of overriding conditions. We conclude that the EIR was deficient in its analysis of land use impacts, mitigation of impacts on historical archaeological resources, and wastewater impacts. We therefore reverse the judgment with directions to the superior court to issue a peremptory writ of mandate ordering the City to vacate its certification of the EIR and its project approvals and make appropriate revisions to the EIR.

FACTUAL AND PROCEDURAL BACKGROUND

1. *Playa Vista Development Site and Phase One*

The Playa Vista development site is located in the City of Los Angeles generally south of Ballona Creek, east of Lincoln Boulevard, west of Interstate 405, and north of the Westchester bluffs. The Playa Vista development was approved in two phases. The

previously approved phase one occupies primarily the eastern and western portions of the larger site, while the phase two site occupies primarily the central portion of the larger site and is surrounded on the east and west by phase one. Before the approval of phase two, the specific plan governing the entire Playa Vista site allowed the development of 3,246 residential units, 2,950,000 square feet of office and light industrial use (M(PV) and M2(PV)), 2,050,000 square feet of regional mixed commercial use (C2(PV)), 650,000 square feet of retail use and commercial use for mixed use developments, and 600 hotel rooms, all in an area known as Area D. The specific plan zoning restricted the uses on the phase two site, which lies entirely within Area D, to only residential and office/light industrial.[1]

The City certified an EIR for phase one in September 1993 and certified an EIR addendum in December 1995. The City approved the development of 3,426 residential units, 2,841,950[2] square feet of office and light industrial space, 400,000 square feet of regional mixed commercial space, and 35,000 square feet of retail space, all in Area D, in phase one. The total area of the phase one development is approximately 363 acres, including a freshwater marsh west of Lincoln Boulevard and other public open space. After the approval of phase one, as amended, the specific plan and zoning allowed the

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[1] The phase two site also includes a thin strip of land zoned for regional mixed commercial use, but the thin strip alone apparently is of no practical use.

[2] This figure included 35,000 square feet of office and light industrial space that would be allowed only if the development of a recycling center were not approved.

development of only 108,050 square feet of office and light industrial use (M(PV)) on the phase two site.

2. *Phase Two Draft EIR*

Playa Capital, as the owner, proposed the development of Playa Vista phase two, known as the Village at Playa Vista, consisting of 2,600 residential units, 175,000 square feet of office space, 150,000 square feet of retail space, and 40,000 square feet of community-serving uses. Phase two also includes the construction of a riparian corridor, including native vegetation, traversing the site from east to west and the restoration of portions of the Westchester bluffs. The riparian corridor would connect with sections previously constructed on the phase one site to the east and west of phase two and would drain into a freshwater marsh constructed on the phase one site.

The City circulated a draft EIR for the phase two project in August 2003. The City extended the period for public review and comments from 60 days to 120 days, ending on December 22, 2003.

3. *Final EIR, Public Hearings, and Project Approval*

The City completed a final EIR for the phase two project in April 2004. The City's deputy advisory agency, planning commission, and planning and land use committee conducted public hearings on and recommended approval of the project. The City of Los Angeles City Council (City Council) at its meeting on September 22, 2004, considered the approval of a vesting tentative map, adoption of a resolution amending the general plan, adoption of ordinances amending the specific plan, and adoption of an ordinance authorizing a development agreement and heard comments by

members of the public. At the conclusion of the hearing, the City Council approved the vesting tentative map providing for the subdivision of the phase two project site, adopted the resolution amending the general plan, certified the EIR, adopted CEQA findings and a statement of overriding considerations, and made other findings. The City Council also voted to adopt ordinances amending the specific plan and an ordinance authorizing a development agreement, but because the vote was not unanimous the ordinances were not adopted at that time and the City Council, pursuant to its procedural rules, scheduled another vote on the ordinances for the following week.

At its meeting on September 29, 2004, the City Council unanimously adopted the ordinances amending the specific plan and authorizing the development agreement. The City Council also certified the EIR and adopted the same CEQA findings and statement of overriding considerations at that time, and made other findings.

4. *Trial Court Proceedings*

Petitioners filed a petition for writ of mandate against the City in the superior court in November 2004 challenging its certification of the EIR and approval of the phase two project (Super. Ct. L.A. County, No. BS093502). Federation of Hillside and Canyon Associations, BEEP, and others filed a separate petition for writ of mandate against the City and the City Council in November 2004 challenging the certification of the EIR and approval of the project (Super. Ct. L.A. County, No. BS093507). The court consolidated the two proceedings. After a hearing on the merits in August 2005, the superior court issued a tentative decision denying the petitions. The court adopted the

tentative decision as its statement of decision and entered a judgment denying the petitions in January 2006.

Petitioners and BEEP separately appealed the judgment. We have consolidated the two appeals.

CONTENTIONS

Petitioners contend (1) the EIR was required to discuss preservation in place as a means to mitigate significant impacts on historical archaeological resources, but failed to do so; (2) the evidence does not support the City's finding that the mitigated impact on historical archaeological resources will be less than significant; (3) the EIR improperly failed to discuss a proposed alternative that would relocate or redesign the riparian corridor to avoid disturbing historical archaeological resources; (4) the City's responses to comments concerning historical archaeological resources were inadequate; (5) the City was required to revise and recirculate the EIR to include significant new information discovered during the public review period concerning the extent of Native American burial sites on the phase one property, but failed to do so; (6) the City never seriously considered recommendations by the Native American Heritage Commission (NAHC) concerning historical archaeological resources and therefore failed to consult with NAHC as required; (7) the City improperly delegated its responsibility under the general plan to protect historical archaeological resources to other public agencies, and the EIR failed to discuss this inconsistency with the general plan, as required; (8) the methane gas testing was clearly inadequate, the responses to comments so stating were inadequate, and the EIR improperly deferred further testing and the determination of

appropriate mitigation measures until after project approval; (9) the EIR was affirmatively misleading and failed to reveal important information that cast doubt on the efficacy of the methane testing; (10) the EIR should have disclosed the available data concerning the efficacy of the phase one mitigation measures, the failure to disclose that information rendered the EIR inadequate, and the City's responses to comments requesting that information were inadequate; (11) the evidence does not support the City's finding that mitigation will reduce the methane gas impacts to an insignificant level; (12) the EIR improperly failed to acknowledge that the project would necessitate expansion of the City's wastewater treatment system and failed to analyze environmental impacts that will result from that expansion; (13) the EIR failed to identify and analyze a significant wastewater impact mandated by the City's own threshold of significance; (14) the EIR improperly failed to analyze environmental impacts to the Santa Monica Bay as cumulative impacts resulting in part from the project's wastewater discharge; (15) the EIR failed to adequately analyze the environmental benefits of a "no project" alternative, including benefits that would result from use of the site as a treatment wetlands, and failed to adequately respond to a comment requesting further analysis; (16) the traffic analysis in the EIR was faulty, misleading, and was not supported by the available data; (17) the City failed to adequately respond to comments by Caltrans critical of outdated data cited in the EIR; (18) the EIR failed to adequately analyze impacts on public bus lines serving the project; (19) the City failed to apply Santa Monica's methodology for analyzing impacts on secondary streets in Santa Monica and instead applied the City's more lax

methodology, resulting in undercounting and a deficient analysis; (20) the analysis of traffic impacts on secondary streets in Los Angeles was faulty and misleading; and (21) activity on the project should be stayed until the City certifies a valid EIR in accordance with CEQA.

BEEP contends (1) the project description in the EIR was misleading because it failed to disclose that the project required zoning changes that would dramatically increase the amount of development permissible on the phase two site; (2) there is no provision for adequate funding of the additional Culver City buses to be provided in connection with the project, so there is no substantial evidence to support a finding that the mitigation measure is feasible or enforceable and no evidence to support the City's finding that traffic impacts will be mitigated to an insignificant level; (3) the City failed to determine whether condition 116 of the phase one project approval was satisfied before approving the phase two project, contrary to the terms of the condition; (4) the analysis of a "no project" alternative in the EIR was misleading because it falsely stated that the remediation of soil and groundwater contamination at the site would not continue if there were no project; (5) the analysis of a second "no project" alternative in the EIR was misleading as to traffic impacts because it stated, contrary to Playa Capital's own traffic study, that development under the then-existing entitlements would result in significant traffic impacts; (6) the analysis of the second "no project" alternative in the EIR was misleading as to solid waste impacts because it characterized both the impacts of the alternative and the vastly greater impacts of the project as significant and because it failed to account for recycling as mitigation; (7) the statement

of overriding considerations failed to explain in sufficient detail the City's balancing of competing benefits and impacts of the phase two project; and (8) activity on the project should be stayed until the City complies with CEQA.

DISCUSSION

1. *CEQA Requirements*

"CEQA is a comprehensive scheme designed to provide long-term protection to the environment. [Citation.] In enacting CEQA, the Legislature declared its intention that all public agencies responsible for regulating activities affecting the environment give prime consideration to preventing environmental damage when carrying out their duties. [Citations.] CEQA is to be interpreted 'to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.' [Citation.]" (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 112.)

An EIR is required for any project that a public agency proposes to carry out or approve that may have a significant effect on the environment. (Pub. Resources Code, §§ 21100, subd. (a), 21151, subd. (a); Guidelines, § 15064,[3] subd. (a)(1).) An EIR must describe the proposed project and its environmental setting, state the objectives sought to be achieved, identify and analyze the significant effects on the environment, state

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[3] All references to Guidelines are to the CEQA Guidelines (Cal. Code Regs., Tit. 14, § 15000 et seq.) developed by the Governor's Office of Planning and Research and adopted by the California Resources Agency. (Pub. Resources Code, §§ 21083, 21087.) "[C]ourts should afford great weight to the Guidelines except when a provision is clearly unauthorized or erroneous under CEQA." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 391, fn. 2 (*Laurel Heights I*).)

how those impacts can be mitigated or avoided, and identify and analyze alternatives to the project, among other requirements. (Pub. Resources Code, §§ 21100, subd. (b), 21151; Guidelines, §§ 15124, 15125, 15126.6.) "The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." (Pub. Resources Code, § 21061.)

The lead agency must notify the public of the draft EIR, make the draft EIR and all documents referenced in it available for public review, and respond to comments that raise significant environmental issues. (Pub. Resources Code, §§ 21092, 21091, subds. (a), (d); Guidelines, §§ 15087, 15088.) The agency also must consult with and obtain comments from other agencies affected by the project and respond to their comments. (Pub. Resources Code, §§ 21092.5, 21104, 21153; Guidelines, § 15086.) The agency must prepare a final EIR including any revisions to the draft EIR, comments received from the public and from other agencies, and responses to comments. (Guidelines, §§ 15089, subd. (a), 15132.)

An agency may not approve a project that will have significant environmental effects if there are feasible alternatives or feasible mitigation measures that would

substantially lessen those effects.[4] (Pub. Resources Code, §§ 21002, 21002.1, subd. (b); Guidelines, § 15021, subd (a)(2); *Mountain Lion Foundation v. Fish & Game Com.*, *supra*, 16 Cal.4th at p. 134.) An agency may find, however, that particular economic, social, or other considerations make the alternatives and mitigation measures infeasible and that particular project benefits outweigh the adverse environmental effects. (Pub. Resources Code, § 21081, subds. (a)(3), (b); Guidelines, § 15091, subd. (a)(3).) Specifically, an agency cannot approve a project that will have significant environmental effects unless it finds as to each significant effect, based on substantial evidence in the administrative record, that (1) mitigation measures required in or incorporated into the project will avoid or substantially lessen the significant effect; (2) those measures are within the jurisdiction of another public agency and have been adopted, or can and should be adopted, by that agency; or (3) specific economic, legal, social, technological, or other considerations make the mitigation measures or alternatives identified in the EIR infeasible, and specific overriding economic, legal, social, technological, or other benefits outweigh the significant environmental effects. (Pub. Resources Code, §§ 21081, 21081.5; Guidelines, §§ 15091, subds. (a), (b).) A finding that specific overriding project benefits outweigh the significant

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[4] " 'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code, § 21061.1; see also Guidelines, § 15364.)

environmental effects (Pub. Resources Code, § 21081, subd. (b)) is known as a statement of overriding considerations. (Guidelines, § 15093.)

Thus, a public agency is not required to favor environmental protection over other considerations, but it must disclose and carefully consider the environmental consequences of its actions, mitigate or avoid adverse environmental effects if feasible, explain the reasons for its actions, and afford the public and other affected agencies an opportunity to participate meaningfully in the environmental review process. The purpose of these requirements is to ensure that public officials and the public are aware of the environmental consequences of decisions before they are made. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 (*Goleta Valley*).) The EIR process also informs the public of the basis for environmentally significant decisions by public officials and thereby promotes accountability and informed self-government. (*Laurel Heights I, supra,* 47 Cal.3d at p. 392; *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935-936.) Before approving the project, the agency must certify that its decisionmaking body reviewed and considered the information contained in the EIR, that the EIR reflects the agency's independent judgment and analysis, and that the EIR was completed in compliance with CEQA. (Pub. Resources Code, § 21082.1, subd. (c); Guidelines, § 15090.)

"We have repeatedly recognized that the EIR is the 'heart of CEQA.' [Citations.] 'Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR

"protects not only the environment but also informed self-government." [Citations.]' To this end, public participation is an 'essential part of the CEQA process.' [Citations.]" (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123 (*Laurel Heights II*).)

" 'Significant effect on the environment' means a substantial, or potentially substantial, adverse change in the environment." (Pub. Resources Code, § 21068.) The Guidelines define "significant effect on the environment" in relevant part as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."[5] (Guidelines, § 15382.)

"Substantial evidence" under CEQA "includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact." (Pub. Resources Code, § 21080, subd. (e)(1); see Guidelines, §§ 15384, subd. (b), 15064, subd. (f)(5).) The Guidelines define "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached," and state that this

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[5] " 'Environment' means the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project. The 'environment' includes both natural and man-made conditions." (Guidelines, § 15360; see Pub. Resources Code, § 21060.5.)

determination must be made "by examining the whole record before the lead agency." (Guidelines, § 15384, subd. (a).) "Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment." (Pub. Resources Code, § 21080, subd. (e)(2); accord, *id.* § 21082.2, subd. (c); see also Guidelines, § 15384, subd. (a).)

2. *Standard of Review*

The standard of review of an agency's decision under CEQA is abuse of discretion. Abuse of discretion means the agency failed to proceed in a manner required by law or there was no substantial evidence to support its decision. (Pub. Resources Code, §§ 21168, 21168.5; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 945.) Whether the agency failed to proceed in a manner required by law is a question of law. A court determines de novo whether the agency complied with CEQA's procedural requirements, " 'scrupulously enforc[ing] all legislatively mandated CEQA requirements' (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 [276 Cal.Rptr. 410, 801 P.2d 1161])." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 435 (*Vineyard Area Citizens*).) The failure to provide information required by CEQA in an EIR is a failure to proceed in a manner required by law. (*Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118.) The failure to comply with CEQA's procedural or information disclosure requirements is a prejudicial abuse of discretion if the decision makers or the public is deprived of

information necessary to make a meaningful assessment of the environmental impacts. (*Sierra Club v. State Bd. of Forestry* (1994) 7 Cal.4th 1215, 1236-1237; *County of Amador*, *supra*, at p. 946; see Pub. Resources Code, § 21005.)

Findings of fact made by the agency and factual conclusions stated in an EIR are reviewed under the substantial evidence standard. (*Vineyard Area Citizens*, *supra*, 40 Cal.4th at p. 435; *Laurel Heights I*, *supra*, 47 Cal.3d at pp. 392-393, 407.) Under the substantial evidence standard, the court does not determine whether the agency's factual determinations were correct, but only determines whether they were supported by substantial evidence. (*Laurel Heights I*, *supra*, at pp. 392-393.) On appeal, we independently review the agency's decision under the same standard of review that governs the trial court. (*Vineyard Area Citizens*, *supra*, at p. 427.)

3. *Land Use Impacts*

a. *Factual Background*

The zoning designations in the specific plan governing Area D restricted uses on the phase two site to only residential (R4(PV)) and office and light industrial (M(PV)). The specific plan limited the total number of residential units in all of Area D to 3,246 and restricted office and light industrial uses in all of Area D to 2,950,000 square feet. After the approval of phase one, including the construction of 3,246 residential units and 2,841,950 square feet of office and light industrial space (in addition to 400,000 square feet of regional mixed commercial space and 35,000 square feet of retail space), the specific plan allowed no additional residential units in Area D, and only 108,050 square feet of office and light industrial space (2,950,000 – 2,841,950 = 108,050) could

be built on the phase two site. Approval of the phase two development consisting of 2,600 residential units, 175,000 square feet of office space, 150,000 square feet of retail space, and 40,000 square feet of community-serving uses therefore required amendments to the specific plan to allow the additional development beyond only 108,050 square feet of office and light and industrial space. The proposed additional development was a large increase in the amount of development allowed on the phase two site.

b. *CEQA Requirements*

The purpose of an EIR is to inform the public and decision makers of the environmental consequences of public agencies' decisions before they are made. (*Laurel Heights II*, *supra*, 6 Cal.4th at p. 1123.) An EIR " ' "protects not only the environment but also informed self-government." [Citations.]' To this end, public participation is an 'essential part of the CEQA process.' [Citations.]" (*Ibid.*) In determining whether an abuse of discretion is established, " 'The court does not pass upon the correctness of the EIR's environmental conclusions, but only upon its sufficiency as an informative document.' [Citation.]" (*Laurel Heights I*, *supra*, 47 Cal.3d at p. 392.) Technical perfection and an exhaustive analysis are not required, but an EIR must "reflect a good faith effort at full disclosure." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712; accord, Guidelines, § 15151.)

"The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that

government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been taken into account. (*Laurel Heights I*, *supra*, 47 Cal.3d at pp. 391-392.) For the EIR to serve these goals it must present information in such a manner that the foreseeable impacts of pursuing the project can actually be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made." (*Vineyard Area Citizens*, *supra*, 40 Cal.4th at pp. 449-450.)

c. *The Analysis of Land Use Impacts Was Misleading*

The EIR included a 35-page project description section, including several pages of maps, tables, and figures. That section stated that the proposed project involved the construction of 2,600 residential units, 175,000 square feet of office space, 150,000 square feet of retail space, and 40,000 square feet of community-serving uses in addition to the construction of a riparian corridor and restoration of a portion of the bluffs. It stated further that the project would require amendments to the general and specific plans, including amendments to "modify the land uses and densities currently allowed by" and "adjust the land use entitlement allowed in" the specific plan. The project description did not state that the existing specific plan allowed the development of only 108,050 square feet of office and light industrial space on the phase two site and no other development, and did not disclose that the project would dramatically increase the amount of development allowed on the phase two site or that the amendments to "modify" and "adjust" the land use restrictions would increase the permissible

development from only 108,050 square feet of office and light industrial space to 2,600 residential units, 175,000 square feet of office space, 150,000 square feet of retail space, and 40,000 square feet of community-serving uses.

A subsection of the project description section discussed the "history and evolution" of the entire Playa Vista project. It stated that, compared with prior development proposals, "The Proposed Project greatly reduces the scale of the Playa Vista development by limiting development to the remaining portion of Area D, on approximately 111 acres adjacent to the Playa Vista First Phase Project."[6] The project description did not acknowledge that the project would greatly increase the amount of development compared with the development permissible under the existing specific plan.

The executive summary section also stated that the project reduced the scale of development compared with prior proposals and, for the most part, failed to acknowledge that the project would dramatically increase the amount of development permissible on the phase two site. The second sentence of the executive summary stated, "As described more fully in Section I.D., the Proposed Project greatly reduces the scale of development in comparison to previous proposals within the larger area

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[6] The original proposed Playa Vista project area included areas denoted A, B, C, and D. The developer later limited the proposed development to Area D and a small part of Area B.

known as Playa Vista."[7] The summary of the project's land use impacts stated that the proposed specific plan amendments "would enable the Project's proposed development of housing uses in place of office, retail, and hotel uses allowed under the existing Specific Plan." That statement suggested that the amendments involved the substitution of additional residential units in the place of office, retail, and hotel uses that were then allowed on the phase two site. That statement was inaccurate because there was no substitution or exchange involved, but only an increase in the permissible area of office and light industrial uses (from 108,050 to 175,000 square feet), an increase in the number of residential units (from 0 to 2,600), and an increase in the area of retail space (from 0 to 150,000 square feet) and community-serving uses (from 0 to 40,000 square feet) over that which was then allowed on the phase two site. The statement apparently was based on the unstated assumption that the square footage of land uses allowed under the specific plan and not developed in phase one was available for development in phase two without regard to whether the phase two site was actually zoned for those uses. That assumption was untrue.[8]

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[7] The referenced section 1.D., part of the executive summary, was a summary of the historical background and evolution of the entire Playa Vista project.

[8] Playa Capital argues that no specific plan amendment was required for the additional development on the phase two site because the specific plan allowed zone boundary changes without a specific plan amendment. We disagree. The specific plan included a zoning map, stated that the zone boundaries on the map were approximate, and stated that "zone boundary interpretations or adjustments may be made as part of the Plot Plan review and approval process" required for each building permit, provided that "such zone boundary interpretations or adjustments meet the overall intent of the Specific Plan regarding location of land uses, and/or when necessary to ensure that such

The EIR's full analysis of the project's land use impacts graphically illustrated this misleading and unstated assumption. The analysis stated that table 85 showed "the remaining development allowed under the existing Specific Plan, taking into account the previously approved development within the Playa Vista First Phase Project." Table 85, entitled Development Allowed Under Existing Playa Vista Area D Specific Plan, showed the area of office space,[9] number of residential units, area of retail space, and number of hotel rooms allowed in all of Area D under the specific plan (column one), the amounts of each included in the phase one development (column two), and the amounts "Remaining" (column three). As to each category, the amount "Remaining" was simply the difference between the number in column one and the number in column two, without regard to whether the specific plan allowed that land use on the phase two site. Considered together with the accompanying text, the table purported to show that the remaining development allowed on the phase two site under the specific

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zone boundaries precisely coincide with future street, alley or lot lines." Thus, the specific plan provided for interpretation of the approximate zone boundaries shown on the map and for minor adjustments consistent with the overall land use plan, but did not allow for large-scale changes in the land use plan of the type made here. We take judicial notice of the specific plan enacted in 1985 (L.A. Ord. No. 160523), as amended in 1996 (L.A. Ord. No. 170785). (Evid. Code, § 452, subd. (b).)

[9] Table 85 stated that the office space figure included both office and light industrial zones (M(PV) and M2(PV)) and regional mixed commercial zones (C2(PV)).

plan included 1,758,050 square feet of office space, 615,000 square feet of retail uses, and 600 hotel rooms.[10] That was untrue.

Similarly, the analysis of land use impacts stated that table 88 compared development under the proposed phase two project with "the development program that could occur under the Area D Specific Plan." Table 88, entitled Comparison of Area D Specific Plan Uses and Proposed Uses, included the information shown in table 85 and additional columns showing the amounts of each land use under the proposed phase two project (column four), the difference between those amounts and the amounts "Remaining" (column five), and a column labeled "Maximum Permitted by Proposed Specific Plan" (column six). The table appeared to show large decreases in the amounts of office space (reduced by 1,583,050 square feet), retail space (reduced by 465,000 square feet), and number of hotel rooms (reduced by 600 rooms) in the proposed project compared to the maximum amounts remaining for development on the phase two site under the specific plan. Neither the table nor the accompanying text disclosed that the only development actually permitted on the phase two site under the specific plan was 108,050 square feet of office and light industrial use.

Table 89 was entitled Land Use Implications of Proposed Development. It showed the same information as to the remaining amounts of development allowed under the specific plan, and stated that the proposed phase two project would result in

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[10] These figures apparently reflected the purported "office, retail, and hotel uses allowed under the existing Specific Plan" referenced in the executive summary discussed *ante*.

an increase in the number of residential units allowed and a reduction of 1,583,050 square feet of office space, a reduction of 465,000 square feet of retail space, and a reduction of 600 hotel rooms from the amounts that could be developed on the phase two site under the specific plan: "As additional housing is not permitted by the existing Area D Specific Plan, development of the proposed 2,600 housing units would require a Specific Plan Amendment. *The Proposed Project's office, retail and community serving uses could be developed as proposed, pursuant to the provisions of the existing Specific Plan*. However, the Applicant is proposing an amendment to the Area D Specific Plan to eliminate the office, retail and hotel uses that could occur beyond the development of the Proposed Project and previously approved Playa Vista First Phase Project. This would result in the following: a reduction of 1,583,050 sq. ft. of office space, a reduction of 465,000 sq. ft. of retail space, and a reduction of 600 hotel rooms. The exchange between housing uses in place of office, retail and hotel uses is offered in the context of an overall planning concept for the Proposed Project." (Italics added.) The italicized sentence was untrue because the office, retail, and community serving uses of the proposed phase two project could not be "developed as proposed" on the phase two site under the existing specific plan due to the plan's zoning restrictions. The purported reductions were illusory because they were calculated based on office space, retail space, and hotel rooms that could not be developed on the phase two site under the existing specific plan.

Only the EIR's discussion of alternatives, and a brief summary of that discussion in the executive summary, disclosed that the phase two project represented an increase

in the amount of development allowed on the phase two project site. The EIR discussed two "no project" alternatives (see Guidelines, § 15126.6, subd. (e)), the first involving no development on the project site and the second involving development pursuant to the existing specific plan. The analysis of the second "no project" alternative stated that the only uses allowed on the phase two site under the existing zoning were office and light industrial (M(PV)) and residential (R4(PV)), that the phase one project included all of the residential units allowed in Area D under the specific plan and included 2,841,950 square feet of office and light industrial space, and that the only permissible development remaining for the phase two site was 108,050 square feet of office and light industrial uses.[11] Table 187 showed that, compared with the proposed project, the second "no project" alternative represented a decrease of 2,600 residential units, a decrease of 66,950 square feet of office and retail space, a decrease of 150,000 square feet of retail space, and a decrease of 40,000 square feet of community-serving space. One could discern from that analysis what the land use analysis in particular and the EIR as a whole never explicitly stated: that compared with the development allowed under the specific plan, the proposed project represented an increase of 2,600 residential units, an increase of 66,950 square feet of office and retail space, an increase of 150,000

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[11] The executive summary stated with respect to the second "no project" alternative: "This alternative would allow development that could occur without any amendments to the existing specific plan. Under this alternative, development would be limited to approximately 108,050 square feet of office space (approximately 38% less than that included in the Proposed Project), but no residential, retail or community-serving uses."

square feet of retail space, and an increase of 40,000 square feet of community-serving space.

A comment to the draft EIR stated that the summary of the project description in the executive summary "should state that the applicant is seeking an increase in entitlements—about 20 times what the current zoning allows under the Specific Plan." The City responded: "The statement in this comment regarding the increase in development density is not accurate. As compared to the existing amounts of development described in the Specific Plan, the Proposed Project would increase the amount of development for residential use by 2,600 units, but would also reduce the amount of development for retail uses by 465,000 sq. ft. (76 percent less than allowed under the current Specific Plan), and the amount of development for office uses by 1,583,050 sq. ft. (90 percent less than allowed under the current Specific Plan). . . . Also, 600 hotel rooms permitted under the Specific Plan would not be built (a 100% reduction)." Thus, the City persisted in describing the project as a reduction in the amount of development allowed in theory in Area D as a whole rather than an increase in the amount of development actually allowed on the phase two site. Another comment and response were similar.

The City's CEQA findings with respect to land use similarly stated that the specific plan amendments would allow the development of residential units in lieu of office, retail, and hotel uses allowed under the specific plan: "The Specific Plan amendment and zone changes would enable the Project's proposed development of housing uses in place of office, retail, and hotel uses allowed under the existing Specific

Plan. The exchange is offered in the context of the overall planning concept for the Proposed Project." The findings did not acknowledge that the amendments increased the amount of development allowed on the phase two project site and that there was no "exchange."

We conclude that the land use analysis in the EIR was materially misleading with respect to the effect of the proposed specific plan amendments on the amount of development allowed on the phase two project site. Rather than decrease the amount of development permissible on the phase two site as the EIR consistently stated, the amendments dramatically increased the amount of development permissible on the phase two site. The EIR disclosed this important information only in the discussion of the second "no project" alternative and a brief summary of that discussion in the executive summary. Those brief references could not overcome the misleading comparisons of permissible development scenarios in the analysis of land use impacts and the absence of information elsewhere in the EIR as to the true effect of the proposed specific plan amendments. This created a substantial likelihood that the decision makers and the public would not fully appreciate the fact that the proposed project represented a substantial increase in the amount of permissible development on the phase two site, diverted attention away from the projects' true impacts on land use, and impaired the environmental review process in that regard. We conclude that the EIR therefore was deficient as an informational document and that the City failed to proceed in a manner required by law. (*Kings County Farm Bureau v. City of Hanford*, *supra*, 221 Cal.App.3d at pp. 717-718 [held that a misleading impact analysis based on

erroneous information rendered an EIR insufficient as an informational document].) The City must revise the analysis of land use impacts in the EIR. (See section 10, *post*.)

Environmental Planning & Information Council v. County of El Dorado (1982) 131 Cal.App.3d 350 involved a similar problem. The projects in that case were amendments to two area plans within a general plan. (*Id.* at p. 353.) The two EIR's repeatedly compared the impacts of the proposed amended plans with the impacts of full build out under the existing plans, rather than with the existing physical environment. (*Id.* at pp. 355-357.) Although the EIR's discussed some project impacts on the existing physical conditions, the court concluded that the repeated comparisons to the impacts assuming full build out under the existing area plans created illusory reductions in environmental impacts and rendered the EIR's misleading and inadequate as informational documents. (*Id.* at pp. 357-358.) The court stated, "The comparisons utilized in the EIRs can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts which would result." (*Id.* at p. 358.)

BEEP characterizes this problem as a deficient project description. An incomplete or misleading project description can improperly curtail environmental review and the consideration of mitigation measures and project alternatives. "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance. An accurate, stable,

and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193.) Guidelines section 15124 states the requirements for a project description in an EIR, including, "A list of permits and other approvals required to implement the project." (*Id.*, subd. (d)(1)(B).) Guidelines section 15378 states that if the agency could describe the project as either the adoption of a regulation such as a general plan amendment (see *id.*, subd. (a)(1)), or a development proposal that will be subject to governmental approvals such as permits, the agency "shall describe the project as the development proposal for the purpose of environmental analysis." (*Id.*, subd. (d).) We need not decide whether the project description for a development proposal that requires general and specific plan changes must describe in greater detail the required plan changes. Whether we regard the problem here as a deficient and inconsistent project description or an inadequate and misleading analysis of land use impacts, a revised analysis of land use impacts that accurately discloses the effect of the amendments on the amount of development allowed on the phase two site will correct the problem.

4. *Impacts on Historical Archaeological Resources*

a. *Factual Background*

The Ballona Lagoon Archaeological District was established in 1990 in areas in and around the phase two project site. The district was determined to be eligible for listing in the National Register of Historic Places. Each archaeological site within the district is evaluated to determine whether it is of sufficient importance to be designated a contributing element of the district. Two archaeological sites located at least in part

within the phase two project site, known as CA-LAN-62 and CA-LAN-211/H, have been determined to be contributing elements of the district and eligible for listing in the National Register of Historic Places. The two sites contain intact cultural artifacts dating back over 3,500 years and animal and human remains.

The United States Army Corps of Engineers (Corps of Engineers), Advisory Council on Historic Preservation,[12] and state Office of Historic Preservation entered into a Programmatic Agreement concerning the entire Playa Vista project site in 1991. The then-owner of the site and three individuals of Gabrielino descent also signed the agreement under the word "Concur."[13] The agreement stated that the parties agreed to a data recovery plan (also referred to as an Archaeological Treatment Plan) relating to portions of the project site "as a means to take into account the effects of construction of that phase of the project on historic properties." The agreement stated further that a Research Design would "guide the evaluation of [other potential] historic properties," that the Corps of Engineers and Office of Historic Preservation would evaluate "[t]he effects on [other] eligible properties" within the project site, and that "Treatment Plans shall be developed based on these evaluations." The agreement stated that the treatment plans would be consistent with or take into account certain federal and state standards for archaeological research and documentation. The agreement stated that it would

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[12] The Advisory Council on Historic Preservation is an independent federal agency created by the National Historic Preservation Act (16 U.S.C. § 470 et seq.).

[13] The human remains were identified as likely ancestors of the Gabrielino (Tongva) tribe of Native Americans.

expire after 10 years and that the parties to the agreement "shall reconsult to determine whether the terms of the agreement have been met, whether revisions are needed, and whether the Agreement should be extended," but it did not state how to extend the agreement. The Department of the Army in a letter dated October 30, 2001, stated that all parties to the agreement had participated in reconsultation and that "We have concluded the process and we are hereby notifying all parties in writing that the PA has been extended until October 22, 2011."

The Research Design referenced in the Programmatic Agreement was the Playa Vista Archaeological and Historical Project: Research Design, a document drafted by an archaeological firm in 1991. The Research Design discussed the archaeological significance of the project site, the archaeological information collected to date, the impact of the proposed development on the archaeological sites, procedures to evaluate sites to determine their eligibility for listing in the National Register of Historic Places, and methods to extract artifacts and remains from eligible sites and to analyze data. The Research Design stated that after their analysis, human remains and associated artifacts "will be reburied in a place and a manner acceptable to representatives of the Gabrielinos." The data recovery plan referenced in the Programmatic Agreement was a separate document. The data recovery plan provided for the removal of items of archaeological significance during the construction excavation work. The data recovery plan provided for monitoring of the riparian corridor excavation by an archaeologist and for the return of any burials encountered to a representative of the Gabrielinos for reburial.

b. *CEQA Requirements*

An EIR must identify and analyze the significant environmental effects that may result from the project (Pub. Resources Code, § 21100, subds. (a), (b); Guidelines, §§ 15126.2, subd. (a), 15143; *Laurel Heights I*, *supra*, 47 Cal.3d at p. 396 [an EIR must analyze effects that are "a reasonably foreseeable consequence" of the project]), including impacts on historical archaeological resources (Pub. Resources Code, § 21084.1; Guidelines, § 15064.5, subd. (c)). For each significant effect, the EIR must describe and discuss feasible mitigation measures that could minimize the effect. (Pub. Resources Code, § 21100, subd. (b)(3); Guidelines, § 15126.4, subd. (a).) The EIR should discuss both measures proposed by the project proponent and measures proposed by the lead agency or other persons that, if required as conditions of approving the project, could reduce the adverse impacts. (Guidelines, § 15126.4, subd. (a)(1)(A).)

"Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." (Guidelines, § 15126.4, subd. (a)(1)(B).) "If the lead agency determines that a mitigation measure cannot be legally imposed, the measure need not be proposed or analyzed. Instead, the EIR may simply reference that fact and briefly explain the reasons underlying the lead agency's determination." (*Id.*, § 15126.4, subd. (a)(5).) Similarly, if the lead agency rejects project alternatives because they are

infeasible, the EIR should identify the rejected alternatives and briefly explain why they are infeasible. (*Id.*, § 15126.6, subd. (c); *Laurel Heights I, supra*, 47 Cal.3d at pp. 404-405; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 737 (*San Joaquin Raptor*).)

Guidelines section 15126.4, subdivision (b)(3) states that preservation in place is the preferred manner to mitigate impacts on historic archaeological resources and that an EIR must discuss preservation in place:

"Public agencies should, whenever feasible, seek to avoid damaging effects on any historical resource of an archaeological nature. *The following factors shall be considered and discussed in an EIR for a project involving such an archeological site:*

"(A) Preservation in place is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.

"(B) Preservation in place may be accomplished by, but is not limited to, the following:

"1. Planning construction to avoid archaeological sites;

"2. Incorporation of sites within parks, greenspace, or other open space;

"3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site.

"4. Deeding the site into a permanent conservation easement.

"(C) When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. . . ." (Italics added.)

c. *The EIR and the City's Findings*

The EIR stated that two archaeological sites within the project site, CA-LAN-62 and CA-LAN-211/H, were determined to be eligible for listing in the National Register of Historic Places and therefore were historical archaeological resources under CEQA. The EIR stated that the Corps of Engineers, Advisory Council on Historic Preservation, and Office of Historic Preservation entered into the Programmatic Agreement in 1991 in connection with the granting of a federal permit to fill wetlands, that "two local Native American groups of Gabrielino descent . . . signed the Programmatic Agreement," and that the agreement was extended through October 22, 2011. The EIR stated that pursuant to the agreement, the Corps of Engineers had developed Archaeological Treatment Plans for historic properties that would be adversely affected by the phase two project. It stated of the Research Design: "The Research Design presents relevant research questions, provides current knowledge of the archaeological and historical resources, describes potential impacts to prehistoric sources, and outlines future steps to mitigate potential adverse impacts of the Proposed Project on these resources." It also stated that the Research Design "develops a program for the mitigation of impacts on significant archaeological resources resulting from the proposed development." The EIR stated further that the author of the Research Design had prepared an update to that

document in 2003 and that "the update constitutes the Project specific Research Design and Treatment Plan for the Proposed Project."

The EIR stated that Playa Capital together with federal, state, and local public agencies had "considered the impacts of the project element on cultural resources" and had designed the phase two project to avoid disturbing "sections of the significant archaeological sites along the bluffs." It stated further, "The [riparian] corridor itself, however, cannot be placed in such a way as to avoid all portions of these archaeological sites and still function as a hydraulic feature." The EIR stated: "For these reasons, the only feasible mitigation measure in those portions of the significant archaeological sites that will be adversely impacted by the riparian corridor is data recovery. The extent and nature of data recovery along with other mitigation measures for portions of the sites that will not be impacted by construction are set forth in the Research Design and Archaeological Treatment Plans for CA-LAN-62 and CA-LAN-211/H." Based on the foregoing, the EIR stated that implementation of the data recovery plan would fully mitigate the potential significant effects on historical archaeological resources.

The EIR quoted Guidelines section 15126.4, subdivision (b)(3), quoted *ante*, but did not state whether a greater degree of preservation in place could be achieved if the riparian corridor were placed in a different location. Nor did it discuss any other potential means to achieve greater preservation in place in other portions of the development. The CEQA findings adopted by the City Council stated that construction activities could cause potentially significant effects to archaeological resources, but that implementation of the data recovery plan would mitigate those effects to an

insignificant level.[14] The findings explained that the evaluation and treatment of any archaeological resources encountered would contribute to the body of historical knowledge, that the required protocols would avoid significant impacts from the disturbance, damage, or degradation of those resources, and that those measures and the presence of a representative of the Gabrielinos would reduce the potential impacts to an insignificant level.

d. *The EIR Failed to Discuss Preservation in Place as Required*

Petitioners contend the EIR was required to discuss preservation in place as a means to mitigate the significant effects on historical archaeological resources, but failed to do so. We agree. Guidelines section 15126.4, subdivision (b)(3) expresses a clear preference for preservation in place as the preferred manner to mitigate impacts on historical archaeological resources. To ensure that public agencies give adequate consideration to preservation in place as a mitigation measure, section 15126.4, subdivision (b)(3) expressly requires a discussion of preservation in place in the EIR. That discussion should acknowledge that preservation in place is preferred to other methods such as excavation because only preservation in place "maintains the relationship between artifacts and the archaeological context" and because preservation in place "may also avoid conflict with religious or cultural values of groups associated with the site." (*Id.*, subd. (b)(3)(A).) The discussion should describe potential means to

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[14] Although the EIR stated that data recovery was the only feasible means to mitigate impacts on historical archaeological resources, the City did not expressly so find.

accomplish preservation in place, including planning construction to avoid archaeological sites, incorporating the sites within parks or open space, covering the sites with chemically stable soil before building on top of the sites, and deeding the sites into a permanent conservation easement. (*Id.*, subd. (b)(3)(B).) Only by including such a discussion in the EIR itself can the public agency ensure that the decision makers and the public give adequate consideration to both the benefits of preservation in place and potential measures to achieve that preferred goal.

The EIR here failed to discuss preservation in place as a means to mitigate impacts on archaeological resources, as required. It stated that Playa Capital together with federal, state, and local public agencies had "considered the impacts of the project on cultural resources" and had designed the project to avoid some archaeological resources, and that the riparian corridor could not be situated so as to avoid all archeological sites. The EIR, however, failed to discuss whether more archaeological resources could be preserved in place if the riparian corridor were redesigned to avoid the highest concentrations of archaeological resources or if other parts of the project were built at another location, or whether other measures might result in more preservation in place.[15] The EIR alluded to the consideration of impacts on archaeological resources that had taken place previously behind the scenes, but did not

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[15] Alternations to the design of the riparian corridor to achieve more preservation in place could include, for example, varying the depth of the corridor where archaeological resources are encountered and changing the path of the corridor to avoid those resources.

describe the mitigation measures considered and rejected or the reasons for rejecting those measures. The omission of that information from the EIR deprived the City Council and the public of important information concerning the preferred manner to mitigate the significant impacts on historical archaeological resources. That omission effectively precluded both meaningful public participation and informed decisionmaking with respect to the decision on mitigation measures.

We reject the argument by Playa Capital and the City that the design of the riparian corridor was "fixed" by prior federal and state permits and that any other design is legally infeasible and need not be discussed. CEQA imposes legal requirements on the City as the lead agency separate and apart from the requirements imposed on a property owner or other permit applicant under the federal Clean Water Act (33 U.S.C. § 401 et seq.) or former Fish and Game Code section 1600 et seq. The permit approvals under those laws do not supplant or supersede environmental review under CEQA or the required discussion of preservation in place. The permits issued by the Corps of Engineers and California Department of Fish and Game authorizing the construction of the riparian corridor as designed expressly state that the authority granted by the permits does not relieve the owner of the obligation to comply with any other federal, state, or local legal requirement. Moreover, the EIR does not state that any other design of the riparian corridor would be legally infeasible or briefly explain why (see Guidelines, §§ 15126.4, subd. (a)(5), 15126.6, subd. (c)), as would be required to excuse the City's failure to discuss other designs in connection with the required discussion of preservation in place. If on remand the City, exercising its discretion under CEQA,

requires an alternative design as a condition of project approval, Playa Capital can seek approval of the redesigned riparian corridor from the other permitting agencies.

The City's finding that the impact on historical archaeological resources will be insignificant after mitigation by excavation and data recovery did not excuse the failure to discuss preservation in place in the EIR. Guidelines section 15126.4, subdivision (a)(1)(B) states that if several mitigation measures are available, the EIR must discuss each measure and must state the basis for selecting a particular measure. Moreover, subdivision (b)(3) requires a discussion of preservation in place as the preferred mitigation measure irrespective of whether another measure would fully mitigate the potential impact. Based on the foregoing, we conclude that by failing to discuss preservation in place in the EIR, the City failed to proceed in a manner required by law. The City must revise the EIR to discuss preservation in place in accordance with Guidelines section 15126.4, subdivisions (a)(1)(B) and (b)(3). (See section 10, *post*.)

e. *The Appeal Is Not Moot*

Playa Capital and the City contend Petitioners' appeal is moot with respect to the failure to discuss preservation in place in the EIR because the excavation of the riparian corridor and all of the planned excavation of historical archaeological sites has been completed. Petitioners contend the appeal is not moot because this court still can grant effective relief.

An appeal is moot only if the appellate court cannot grant the appellant effective relief. (*Association for a Cleaner Environment v. Yosemite Community College Dist.*

(2004) 116 Cal.App.4th 629, 641.) A decision vacating a project's approval and requiring the preparation or revision of an EIR could result in project modifications to mitigate or avoid significant impacts upon further environmental review in compliance with CEQA, or could result in disapproval of the project. (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1204; *Association for a Cleaner Environment*, *supra*, at p. 641.) Even if such a decision is made after the project is constructed and operating, the agency in the exercise of its discretion, as a condition of project approval, may require the project to be modified or improvements to be removed and the property restored to its prior condition. (*Bakersfield Citizens*, *supra*, at p. 1204; *Woodward Park Homeowners Assn. v. Garreks, Inc.* (2000) 77 Cal.App.4th 880, 888-889.) An applicant who proceeds with construction despite pending CEQA litigation does so at its own risk. (Pub. Resources Code, § 21167.3, subd. (b);[16] *Bakersfield Citizens*, *supra*, at p. 1203.) Playa Capital's decision to proceed with construction despite the risk that this pending litigation could result in project modifications or disapproval of the project in no way moots this appeal. (*Woodward Park*, *supra*, at p. 890.)

The excavation work completed to this date and removal of any human remains or artifacts does not preclude the City, in the exercise of its discretion, from requiring in

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[16] Public Resources Code section 21167.3, subdivision (b) states that if a responsible agency approves a project after the commencement of an action or proceeding challenging an EIR or negative declaration under CEQA and no injunction or stay is ordered, "Such approval shall constitute permission to proceed with the project at the applicant's risk pending final determination of such action or proceeding."

connection with a future approval of the project modifications to achieve greater preservation in place, including, for example, changing the course or depth of the riparian corridor and restoring archaeological resources to their prior resting places within the excavated corridor, or restoring those items to other suitable locations on the project site. Moreover, the mitigation measures adopted by the City provided not only for the removal of items discovered in known archaeological sites, but also provided for the removal of chance discoveries of archaeological significance that may be discovered during construction. The required discussion of preservation in place in a revised EIR could result in modifications to the data recovery plan that would affect historical archaeological resources that may be discovered in future work on the project.

f. *Petitioners Have Not Shown that the City's Finding on Mitigation Was Unsupported*

Petitioners contend the evidence does not support the City's finding that the impact on historical archaeological resources will be insignificant after mitigation by excavation and data recovery. We review an agency's finding that required mitigation measures will reduce an impact to an insignificant level under the deferential substantial evidence standard. (Pub. Resources Code, § 21081, subd. (a)(1); Guidelines, § 15091, subds. (a)(1), (b); *Laurel Heights I, supra*, 47 Cal.3d at p. 407.) Accordingly, we must defer to the City's finding unless the administrative record viewed as a whole contains no information, or reasonable inferences from information, sufficient to support the finding. (Guidelines, § 15384, subd. (a).)

Petitioners rely on *Architectural Heritage Assn. v. County of Monterey* (2004) 122 Cal.App.4th 1095, 1119, 1120 and *League for Protection of Oakland's etc. Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, 909, in which the courts reviewed decisions to adopt a mitigated negative declaration in lieu of an EIR. The standard of review of an agency's decision that no EIR is required differs from the standard of review of an agency's decision made after an adequate EIR was prepared that mitigation will reduce the impacts to an insignificant level. An EIR is required if substantial evidence in the administrative record supports a fair argument that there will be a significant environmental impact. (Guidelines, § 15064, subd. (f); *Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332.) Thus, the standard applicable to a mitigated negative declaration is virtually a mirror image of the standard applicable here. While a reasonable difference of opinion based on evidence in the record must be resolved in favor of preparing an EIR if no EIR was prepared, a reasonable difference of opinion based on evidence in the record must be resolved in favor of the agency's finding if an adequate EIR was prepared.[17] In light of the differing standard of review, *Architectural Heritage* and *League for Protection* do not support the argument that the evidence here did not support the City's finding.

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[17] Although we conclude that the EIR was inadequate due to its failure to discuss preservation in place as required by Guidelines section 15126.4, and for other reasons discussed in this opinion, those shortcomings did not undermine the City's finding that the proposed mitigation by data recovery would reduce the impacts on historical archaeological resources to an insignificant level.

Petitioners argue that exhumation is the antithesis of preservation of place, even if the remains may be reburied nearby, and that the data recovery plan therefore cannot reduce impacts to an insignificant level. This argument assumes that preservation in place is the only form of mitigation that can reduce impacts to an insignificant level. Guidelines section 15126.4, subdivision (b)(3) states that preservation in place is the preferred manner to mitigate impacts to historical archaeological resources, but does not state that it is the only form of mitigation that can reduce impacts to an insignificant level. Moreover, subdivision (b)(3)(C) recognizes that data recovery may be an appropriate form of mitigation in some circumstances.[18] We conclude that Petitioners have not shown that the finding was unsupported. The City's finding that data recovery will reduce impacts to an insignificant level does not preclude the City on remand from finding that some degree of preservation in place is feasible and desirable and from requiring changes in the project to implement preservation in place as a form of mitigation.

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[18] "When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Regional Information Center. Archaeological sites known to contain human remains shall be treated in accordance with the provisions of Section 7050.5 Health and Safety Code. If an artifact must be removed during project excavation or testing, curation may be an appropriate mitigation." (Guidelines, § 15126.4, subd. (b)(3)(C).)

g. *The Responses to Comments Were Adequate*

Petitioners contend the City's responses to comments requesting additional information about grave sites discovered on the phase one site and questioning the EIR's reliance on data recovery in lieu of preservation in place were inadequate. An agency must evaluate and respond to timely comments on the draft EIR that raise significant environmental issues.[19] (Pub. Resources Code, § 21091, subd. (d); Guidelines, § 15088.) Responses must describe the disposition of the issues raised in the comments such as, for example, revisions to the proposed project to mitigate impacts. (Pub. Resources Code, § 21091, subd. (d)(2)(B); Guidelines, § 15088, subd. (c).) If the agency rejects a recommendation or objection concerning a significant environmental issue, the response must explains the reasons why. (Guidelines, § 15088, subd. (c).) Responses must articulate "good faith, reasoned analysis," and not mere "[c]onclusory statements unsupported by factual information." (*Ibid.*; *Environmental Protection Information Center, Inc. v. Johnson* (1985) 170 Cal.App.3d 604, 628.) The level of detail required in a response depends on factors such as the significance of the issue raised, the level of detail of the proposed project, the level of detail of the comment, and the extent to which the matter is already addressed in the draft EIR or

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[19] An agency may, but need not, respond to comments received after the close of the public review period. (Pub. Resources Code, § 21091, subd. (d)(2)(B).) Several of the comments cited by Petitioners were made after the close of the public review period. The City had no obligation to respond to those late comments. Petitioners have not shown that the City actually responded to those comments and therefore have not shown that any response to those late comments was inadequate.

responses to other comments. (*Twain Harte Homeowners Assn v. County of Tuolumne* (1982) 138 Cal.App.3d 664, 684-686; *Cleary v. County of Stanislaus* (1981) 118 Cal.App.3d 348, 358-360.)

The requirement of a detailed written response helps to ensure that the agency will fully consider the environmental consequences of a decision before it is made, that the decision is well informed and open to public scrutiny, and that public participation in the environmental review process is meaningful. (*People v. County of Kern* (1974) 39 Cal.App.3d 830, 841-842; cf. *Mountain Lion Foundation v. Fish & Game Com.*, *supra*, 16 Cal.4th at p. 134.)

The remains of over 300 persons were discovered during excavation of the phase one site in the fall of 2003, during the public review period for the phase two draft EIR. Petitioners cite three timely comments to the draft EIR by NAHC,[20] Sierra Club, and an area resident named Leslie Purcell. The comments stated that in light of the extent and significance of the burials discovered on the phase one site, the EIR should explain in more detail the historical archaeological resources that may be present on the phase two site. The City responded, "[t]he exact location of burials and other archaeological resources is not easily predicted, and there are instances where human remains and artifacts are found during construction," and, "efforts will be made to avoid human remains and other archaeological resources." The response stated further that human

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[20] NAHC is a state agency with responsibilities relating to Native American sacred places, burials, and human remains. (Pub. Resources Code, §§ 5097.91, 5097.94, 5097.98.)

remains would be handled in accordance with the Programmatic Agreement, that the EIR described the consultation process that culminated in the Programmatic Agreement, and that the proposed mitigation measures would reduce the impacts to an insignificant level.

Petitioners contend the responses to these comments were inadequate because the EIR and the responses provided insufficient information about the significance of the discoveries on the phase one site to allow decision makers to determine whether the phase two mitigation measures were adequate. We conclude that Petitioners have shown no abuse of discretion in this regard. The responses explained in sufficient detail that the City rejected the requests for further evaluation because the City considered the mitigation measures in the Programmatic Agreement--data recovery--to be adequate. The fact that Petitioners disagree with the City's disposition of issues raised in the comments does not render the responses inadequate. In any event, the City must revise the EIR to discuss preservation in place, as we have stated.

h. *The City Was Not Required to Revise and Recirculate the Draft EIR*

Petitioners contend the City was required to revise and recirculate the draft EIR to include significant new information discovered during the public review period concerning the extent of the burials likely to be present on the phase two site. Public Resources Code section 21092.1 states that if "significant new information is added to an environmental impact report" after the agency has made the draft EIR available for public review and has consulted with other agencies but before the EIR is certified, the

agency must recirculate the revised EIR for public review and consultation with other agencies before certifying the EIR. Recirculation is required only if the new information changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the proposed project or a feasible way to mitigate such an effect. (*Vineyard Area Citizens*, *supra*, 40 Cal.4th at p. 447; *Laurel Heights II*, *supra*, 6 Cal.4th at p. 1129.) Recirculation is not required if the new information merely clarifies or amplifies information in the previously circulated draft EIR. (*Vineyard Area Citizens*, *supra*, at p. 447; *Laurel Heights II*, *supra*, at pp. 1129-1130.)

Recirculation of a draft EIR is required if new information discloses, for example, (1) a new significant environmental impact of the project or of a new proposed mitigation measure; (2) a substantial increase in the severity of a previously disclosed environmental impact that would result unless mitigation measures are adopted; (3) a feasible project alternative or mitigation measure that clearly would reduce the environmental impacts of the project, but that the project's proponent declines to adopt; or (4) that the draft EIR was so fundamentally inadequate and conclusory as to deprive the public of a meaningful opportunity to comment. (Guidelines, § 15088.5; *Laurel Heights II*, *supra*, 6 Cal.4th at p. 1130.) We review an agency's determination that information is not "significant" so as to require recirculation under the substantial evidence standard. (*Vineyard Area Citizens*, *supra*, 40 Cal.4th at p. 447; *Laurel Heights II*, *supra*, at p. 1135.) The CEQA findings adopted by the City Council

included a finding that there was no significant new information in the final EIR and that recirculation was not required.[21]

The draft EIR stated that that many archaeological sites containing cultural artifacts had been identified in the area surrounding the phase two site. It stated that four such sites had been identified on the phase two site and that two of those sites were eligible for listing in the National Register of Historic Places. It stated that one of the two eligible sites, known as CA-LAN-62, measuring 45 by 30 meters and of an undetermined depth, had been found to contain human remains. The draft EIR stated that the riparian corridor in particular would impact the archaeological sites and that other construction activities could reveal new discoveries, but that the archaeological treatment plans required by the Programmatic Agreement would mitigate those impacts.

In light of the information disclosed in the draft EIR, the discovery of numerous additional human remains on the phase one site did not disclose a new environmental impact, but only provided additional information concerning the extent of a previously disclosed impact. The discovery did not undermine the City's finding that the required mitigation by data recovery will reduce the impacts to an insignificant level, and therefore did not disclose a substantial increase in the severity of an environmental impact requiring additional mitigation measures. (*Laurel Heights II, supra,* 6 Cal.4th at

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[21] Even without such an express finding, an agency that certifies a final EIR necessarily determines that there is no significant new information requiring recirculation. (*Laurel Heights II, supra,* 6 Cal.4th at p. 1134.)

p. 1137.) Accordingly, we conclude that substantial evidence supports the City's finding that recirculation was not required. (*Ibid.*)

i. *The City Consulted with NAHC*

Petitioners contend the City never seriously considered NAHC's recommendations concerning historical archaeological resources and therefore failed to consult with NAHC as required. They cite letters from NAHC to the City requesting additional measures to preserve those resources and argue that the City's responses to the letters were inadequate. All of the letters were dated after the close of the public review period and after the completion of the final EIR in April 2004.

CEQA requires the lead agency to "consult with, and obtain comments from" other public agencies (Pub. Resources Code, §§ 21104, subd. (a)), 21153, subd. (a)), including agencies that have jurisdiction by law with respect to the project or exercise authority over resources that may be affected by the project. (Guidelines, § 15086, subd. (a)(3).) The lead agency must consider comments on a draft EIR received during the public review period, but need not consider or respond to late comments. (Pub. Resources Code, § 21091, subd. (d)(1)); Guidelines, § 15088, subd. (a); see Guidelines, § 15086, subd. (d) [stating that a responsible or trustee agency must submit any comments on a draft EIR before the close of the public review period].) If the agency responds to late comments, the adequacy of the responses is measured by the same standard as are responses to timely comments. (Guidelines, § 15088, subd. (c).)

Neither CEQA nor the Guidelines define "consult" or "consultation." The Guidelines explain that the lead agency must file a notice of completion of a draft EIR

with the Office of Planning and Research (Guidelines, § 15085; see Pub. Resources Code, § 21161) and must provide the draft EIR to other public agencies, ordinarily through the State Clearinghouse, for their review and comment (Guidelines, §§ 15023, subd. (c), 15087, subd. (f), 15025). Absent any other specific requirement concerning review of a draft EIR by another agency in either CEQA or the Guidelines, we conclude that to "consult with" (Pub. Resources Code, §§ 21104, subd. (a)), 21153, subd. (a)) another agency concerning a draft EIR means to provide a notice of completion and a copy of the draft EIR in order to facilitate timely review and comment by the other agency. Petitioners' argument that the consultation requirement invites judicial review of the quality of the City's responses to letters received after the close of the public review period by some measure other than the standard applicable to responses to comments is not supported by CEQA or the Guidelines. Petitioners have not shown that the City failed to provide the required notice and copy of the draft EIR to NAHC and therefore have not shown a failure to consult. To the extent Petitioners argue that the responses to NAHC's late comments were inadequate, we conclude that the responses adequately explained the City's conclusion that the data recovery plan was appropriate.

j. *The Discussion of Alternatives was Adequate with Respect to Historical Archaeological Resources*

Petitioners contend the range of alternatives discussed in the EIR was inadequate because the EIR did not discuss any alternative that would avoid historical archaeological resources by redesigning, relocating, or omitting the riparian corridor, or by reducing the size or changing the location of other portions of the development. An

EIR must discuss a reasonable range of potentially feasible alternatives to the proposed project. (Pub. Resources Code, §§ 21002, 21002.1, subd. (a), 21100, subd. (b)(4); Guidelines, § 15126.6; *Goleta Valley*, *supra*, 52 Cal.3d at pp. 564-566; *Laurel Heights I*, *supra*, 47 Cal.3d at p. 400.) The discussion must focus on alternatives that could avoid or substantially reduce one or more of the significant environmental effects of the project while still serving most of the project's fundamental objectives, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. (Guidelines, § 15126.6, subds. (a), (b); *Laurel Heights I*, *supra*, at p. 400.) An EIR must discuss alternatives that could avoid or substantially reduce significant impacts even if proposed mitigation measures would avoid or substantially reduce those impacts. (*Laurel Heights I*, *supra*, at pp. 400-403.) This requirement ensures that decision makers are provided with sufficient information to allow an informed decision as to both alternatives and mitigation measures, which serve the same purpose of avoidance of environmental harm. (*Id.* at p. 403.)

An EIR must discuss alternatives to the project as a whole but need not discuss alternatives to each element of a project. (*A Local & Regional Monitor v. City of Los Angeles* (1993) 16 Cal.App.4th 630, 642, fn. 8; *Big Rock Mesas Property Owners Assn. v. Board of Supervisors* (1977) 73 Cal.App.3d 218, 226-227.) An EIR need not consider every conceivable alternative but, under the rule of reason, must consider a range of alternatives sufficient to permit the agency to make a reasoned choice and to meaningfully inform the public. Both the range of alternatives and the extent of analysis of the alternatives are governed by the rule of reason. (Guidelines, § 15126.6,

subds. (a), (f); *Goleta Valley*, *supra*, 52 Cal.3d at pp. 565-566; *Laurel Heights I*, *supra*, 47 Cal.3d at pp. 406-407.)

The EIR analyzed seven alternatives to the proposed project: (1) a "no project" alternative involving no development on the phase two site; (2) a "no project" alternative involving development of the maximum square footage allowed under the existing specific plan and zoning (108,050 square feet of office space only); (3) development of the maximum square footage allowed under the specific plan if the zoning were amended (1,758,050 square feet of office space, 615,000 square feet of retail space, 20,000 square feet of community-serving uses, 600 hotel rooms, and no housing); (4) development of the same improvements as the proposed project but with a 25-percent reduction in density of each land use; (5) development of housing, park space, and community-serving uses with a 25-percent reduction in density, and no development of retail or office space; (6) development of housing with a 75-percent reduction in density, but no development of retail, office, or community-serving uses; and (7) development of the same improvements as the proposed project at an alternative site, but with no riparian corridor or bluff restoration. The EIR also briefly discussed several alternatives that were rejected as infeasible and therefore were not analyzed further in the EIR, including a regional park, public entertainment uses such as a theme park or sports stadium, light industrial uses, a transit center, and a school.

Alternatives 3 through 6 each included construction of a riparian corridor essentially identical to that in the proposed project. The two "no project" alternatives (alternatives 1 and 2) and the off-site alternative (alternative 7) included no riparian

corridor. None of the alternatives included the redesign or relocation of the riparian corridor or any other significant project feature for the purpose of avoiding impacts on historical archaeological resources.

Guidelines section 15126.4, subdivision (b)(3) states that preservation in place as the preferred manner to mitigate impacts to archaeological sites "shall be considered and discussed in an EIR for a project involving such an archaeological site." Subdivision (b)(3)(B) states that the factors that must be considered and discussed in an EIR include the possibility of accomplishing preservation in place by measures such as "1. Planning construction to avoid archaeological sites; [¶] 2. Incorporation of sites within parks, greenspace, or other open space; [¶] 3. Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site. [¶] 4. Deeding the site into a permanent conservation easement."

Petitioners are correct in arguing that the EIR was required to discuss preservation in place as a means to mitigate the significant effects on historical archaeological resources, as stated *ante*. The required discussion necessarily will include the possibility of accomplishing greater preservation in place by measures such as those described in Guidelines section 15126.4, subdivision (b)(3)(B).

Although CEQA requires an EIR to discuss both project alternatives and mitigation measures (*Laurel Heights I*, *supra*, 47 Cal.3d at pp. 400-403), the specific requirements of Guidelines section 15126.4, subdivision (b)(3)(B) pertain to mitigation measures only, not project alternatives. The title of Guidelines section 15126.4

("Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects") and the introductory heading in subsection (b) ("Mitigation Measures Related to Impacts on Historical Resources") both refer to "Mitigation Measures," and subsection (b)(3)(A) refers to preservation in place as "the preferred manner of mitigating impacts to archaeological sites." Guidelines section 15126.6, in contrast, is entitled "Consideration and Discussion of Alternatives to the Proposed Project," governs the discussion of alternatives to the proposed project, and does not state that the discussion of alternatives must include an alternative designed to accomplish preservation in place. Accordingly, we conclude that although an EIR must discuss mitigation measures designed to accomplish preservation in place pursuant to section 15126.4, subdivision (b)(3), it need not include in the discussion of alternatives an alternative designed to accomplish more preservation in place.

We conclude further that the failure to analyze an alternative designed to accomplish more preservation in place did not render the range of alternatives inadequate. The EIR analyzed several alternatives to the project as a whole, including three alternatives without a riparian corridor and that either would not disturb historical archaeological resources or would do so to a much lesser extent. The analysis provided a sufficient basis for comparison with the proposed project with respect to the environmental impacts as a whole and impacts to historical archaeological resources in particular. Moreover, the EIR was not required to analyze an alternative designed to reduce each individual significant impact, as we have stated.

k. *The EIR Did Not Fail to Discuss an Inconsistency with the General Plan*

Petitioners contend the conservation element of the City's general plan places the responsibility for monitoring and enforcement of measures to protect archaeological resources on the City as the lead agency, but the City surrendered that responsibility to the Corps of Engineers by assigning the Corps of Engineers a prominent role in the implementation of the data recovery plan. They argue that the project is inconsistent with the general plan in this regard and that the EIR failed to discuss this inconsistency as required by Guidelines section 15125, subdivision (d).

The mitigation monitoring program in the final EIR stated that in the event of the discovery of previously unknown historical archaeological resources during construction, "The U.S. Army Corps of Engineers and State Historic Preservation Officer shall immediately be notified to provide these agencies with the opportunity to assess the resources and offer recommendations for treatment required by the Programmatic Agreement." It designated the Corps of Engineers as the "Enforcement Agency" and "Monitoring Agency" with respect to this mitigation measure and other mitigation measures requiring appropriate archaeological treatment plans, curation, and submission to the City of an archaeological investigation report.

Guidelines section 15125, subdivision (d) states, in relevant part, "The EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans." CEQA and the Guidelines do not require the agency to make any finding with respect to the project's consistency or inconsistency with applicable plans,

and the City did not expressly find that the project and the adopted mitigation measures were consistent with the general plan conservation element. A court must defer to an agency's finding that a land use decision is consistent with a general plan unless there is no substantial evidence to support the conclusion, that is, unless no reasonable person could have reached the same conclusion. (*No Oil, Inc. v. City of Los Angeles* (1987) 196 Cal.App.3d 223, 243; *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 407-408.) *Families Unafraid to Uphold Rural etc. County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332, 1341-1342, for example, held that the evidence compelled the conclusion that a subdivision project was inconsistent with a "fundamental, mandatory and specific land use policy" in the general plan's land use element, despite the board of supervisor's finding of consistency. Absent an express finding by the City to review, however, we must resort to other principles to determine whether the EIR was required to discuss the purported inconsistency.

Every county and city must adopt a "comprehensive, long-term general plan" for its physical development. (Gov. Code, § 65300.) A general plan must include "a statement of development policies and . . . objectives, principles, standards, and plan proposals." (*Id.*, § 65302.) A general plan embodies fundamental policy decisions (*Goleta Valley, supra*, 52 Cal.3d at p. 571) and serves as a "charter for future development" (*Lesher Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540). "The policies in a general plan typically reflect a range of competing interests. [Citation.]" (*Federation of Hillside & Canyon Assns. v. City of Los Angeles* (2004) 126 Cal.App.4th 1180, 1194.)

A local agency has unique competence to interpret the policies of its own general plan and weigh competing interests in determining how to apply those policies. (*Save Our Peninsula Committee v. Monterey County Bd. of Supervisors*, *supra*, 87 Cal.App.4th at p. 142; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.) "It is, emphatically, *not* the role of the courts to micromanage these development decisions." (*Sequoyah Hills*, *supra*, at p. 719.) It is not the role of the courts to engage in the weighing of competing interests embodied in general plans whether under the guise of reviewing an express finding of consistency or determining whether an EIR was required to discuss a purported inconsistency with an applicable plan. In light of these considerations, we conclude that even absent an express finding by the agency that a particular portion of a project is consistent or inconsistent with a general or regional plan, a court can conclude that an EIR failed to discuss an inconsistency with a general or regional plan, as required by Guidelines section 15125, subdivision (d), only if no reasonable person could conclude that there was no inconsistency.

The general plan states, "The city has a primary responsibility in protecting significant archaeological and paleontological sites" and a "primary responsibility for identifying and protecting its cultural and historical heritage." It states a policy to "identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification activities." It states that the programs to be applied to achieve that policy are "permit processing, monitoring, enforcement and periodic revision of

regulations and procedures." It states further that the responsibility for those programs belongs to particular City departments "and/or the []lead agency responsible for project implementation."

Petitioners construe these general plan provisions to mean that the City has the sole responsibility to monitor and enforce mitigation measures designed to protect archaeological resources and cannot rely on the Corps of Engineers or other agencies. We do not construe the provisions so narrowly. In our view, the provisions do not impose a mandatory and specific requirement that the City monitor and enforce mitigation measures for all private development projects. A more reasonable construction of the provisions is that the City, through permit conditions, regulations, and procedures, may require project applicants to protect archaeological resources and can rely on other public agencies to ensure compliance with mitigation measures. Accordingly, we conclude that Petitioners have not shown a violation of Guidelines section 15125, subdivision (d).

5. *Methane Gas Impacts*

a. *Factual Background*

Methane, a colorless, odorless, hydrocarbon gas, occurs naturally in soils and is flammable in some concentrations, and therefore is a potential danger. Numerous soil gas surveys were conducted on the phase one site to measure methane concentrations, including surveys by Exploration Technologies, Inc. (ETI), a consultant hired by the City's Department of Building and Safety. The soil gas surveys generally involved the insertion of a hollow metal rod into soil to a depth of three to five feet and the removal

of vapor by vacuum extraction. The surveys disclosed elevated levels of methane in parts of the phase one site, principally the western portion. In June 2001, the City adopted a series of methane mitigation measures for phase one and found that those measures would reduce the methane impacts to a level of insignificance, as we explained in our opinion in a prior appeal involving phase one (*Environmentalism Through Inspiration and Non-violent Action v. City of Los Angeles* (Oct. 25, 2005, B174856 [nonpub. opn.])).

Camp Dresser & McGee Inc., an environmental consultant hired by Playa Capital, conducted soil gas surveys on the phase two site between December 1998 and January 2001 based on a 300-foot interval grid, with additional samples taken at 100-foot intervals where high levels of methane were detected. The surveys disclosed high levels of methane in parts of the phase two site, with the highest concentrations in the southwestern portion of the site. ETI stated in a report dated July 10, 2001, updated as of August 10, 2001, that soil gas samples should be taken throughout both the phase one and phase two sites at 100-foot intervals and that additional samples should be taken at 50-foot intervals where methane concentrations were high. The City, however, did not require the additional testing.

The City's Department of Building and Safety established guidelines for methane mitigation at the phase two site, known as the Village at Playa Vista Building Methane Mitigation Guidelines (Playa Vista Methane Guidelines), in August 2003. The Playa Vista Methane Guidelines require the testing of building sites to determine methane concentrations and require a series of specified mitigation measures depending on the

concentrations measured. The methane mitigation measures include dewatering, an impervious membrane, and both passive and active subslab vent systems. The Playa Vista Methane Guidelines also incorporated the then-draft Methane Mitigation Standard for the City, which required the same mitigation measures. The City enacted an ordinance in February 2004 establishing methane mitigation requirements for new buildings and paved areas located in defined methane zones or methane buffer zones throughout the City, including required site testing and a series of methane mitigation measures depending on the concentrations measured. The methane mitigation system requirements under the ordinance apparently are identical to those under the Playa Vista Methane Guidelines.

b. *The EIR, Responses to Comments on Methane Gas Testing, and the City's Findings*

The draft EIR described the soil gas surveys performed on the phase two site and the prior surveys on the phase one site. It stated that high methane gas levels on portions of the phase two site were a potentially significant impact, but that the recommended mitigation measures would reduce the impact to an insignificant level. The recommended mitigation measures were those required by the Playa Vista Methane Guidelines and draft Methane Mitigation Standard, both attached as appendices to the EIR. The draft EIR stated that a methane safety plan in compliance with those requirements should be required for each building before a building permit is issued.

A written comment by Jeanette Vosburg, a local resident, attached an except from ETI's report updated as of August 10, 2001, stating that further soil gas sampling

should be performed throughout the site before proceeding with construction. There was no mention of the report in the draft EIR. Vosburg also expressed concerns about a potential explosion of or exposure to "toxic oil field gas." Walter Merschat, an experienced geologist who worked for ETI from 1999 to 2001 collecting soil gas samples on the entire Playa Vista site, stated in a written comment that the draft EIR understated the extent of methane gas detected at the site, that some of the sampling may have been inaccurate, and that the site was undersampled:

"In general, the DEIR appears to downplay the magnitudes, as well as the very existence, of elevated levels of soil gases (especially methane). In reality, the Playa Vista site had some of the highest and wide spread (numerous) elevated levels of methane samples that I have ever collected. Furthermore, because the Playa Vista site was undergoing development at the time I was requested to conduct the sampling, the sampling I did at the Playa Vista site was often times in areas where surface soil was removed or in fresh surcharge material, thus making low readings questionable. Simply put, by sampling areas of fresh surcharge (cover) the methane gas (if present below the surcharge) did not have adequate time to migrate upward and be detected.

"Additionally, I have reviewed my field maps as well as several maps in the DEIR. I am concerned to learn that large portions of the Playa Vista Phase Two site lack sufficient sample density to determine the presence or absence of methane or other vapors of concern. The testing must be done on at least fifty-foot centers to adequately describe the soil gas characteristics of the site."

[¶] . . . [¶]

"In order to properly and accurately characterize the proposed project site's methane contamination, the entire Playa Vista site must be properly characterized, which requires additional testing in both the Phase One development area and the proposed Phase Two development area. The DEIR fails to recognize the need for this additional precautionary investigation, and therefore, the DEIR should be revised to do so."

The City provided topical responses to issues that were raised in several comments. The topical response on methane gas generally described the results of the testing discussed in the draft EIR and stated that additional soil gas testing would be required prior to the issuance of individual building permits. It stated further that appropriate mitigation measures would be implemented based on the test results and that methane concentrations within buildings would be monitored. The City also responded individually to the comments by Vosburg and Merschat.

The City's response to Vosburg's comment referred to the topical response and parts of the draft EIR discussing methane gas, and stated that the City and numerous consultants had determined in connection with the phase one methane investigation that the methane was from a thermogenic source and was not associated with a natural gas storage field nearby. The response to Merschat's comment also referred to the topical response and parts of the draft EIR discussing methane gas. The response stated that "low methane concentrations were detected in soil gas within the Proposed Project site," that only 10 samples collected at the phase two site had methane concentrations above the action level of 5,000 parts per million (10 percent of the lower explosive limit of

50,000 parts per million), and that all building sites would be tested and would be required to include an appropriate methane mitigation system.

The CEQA findings adopted by the City Council stated that high levels of methane gas created potentially significant impacts, but that required compliance with the Playa Vista Methane Guidelines and Methane Mitigation Standard would mitigate those impacts to an insignificant level. The findings stated that prior to issuance of each building permit, the developer would be required to submit a methane safety plan in compliance with those requirements.

c. *The Methane Gas Testing and Responses to Comments Were Adequate*

Petitioners contend the methane gas testing was clearly inadequate, the responses to comments so stating were inadequate, and the EIR improperly deferred further methane gas testing and the determination of appropriate mitigation measures until after project approval.[22]

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[22] The superior court stated that it was likely that the EIR need not have discussed methane impacts because the methane gas was a preexisting environmental condition and the project would cause no physical change in the environment with respect to methane. Regardless of whether that statement was correct as a statement of law (compare *Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464, 1468 [held that no EIR was required for a project that might be affected by preexisting environmental contamination nearby because the project did not cause a physical change in those conditions] with Guidelines, §§ 15126.2, subd. (a) ["The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected. For example, an EIR on a subdivision astride an active fault line should identify as a significant effect the seismic hazard to future occupants of the subdivision. The subdivision would have the effect of attracting people to the location and exposing them to the hazards found there."], 15131, subd. (b) ["Economic or social effects of a project may be used to determine the significance of physical

An EIR must include facts and analysis sufficient to allow the decision makers and the public to understand the environmental consequences of the project. (Guidelines, § 15151; *Laurel Heights I*, *supra*, 47 Cal.3d at pp. 404-405; *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 356 (*Napa Citizens*).) This does not mean that a reviewing court should weigh conflicting evidence to determine whether the information in an EIR is accurate or complete. Rather, the question for a reviewing court is whether the conclusions in an EIR are supported by substantial evidence (*Laurel Heights I*, *supra*, at p. 407) and whether the EIR discloses " 'the analytic route the . . . agency traveled from evidence to action' " (*Goleta Valley*, *supra*, 52 Cal.3d at p. 568, quoting *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515). If an appellant challenges the EIR's reliance on particular studies, "[T]he issue is not whether the studies are irrefutable or whether they could have been better. The relevant issue is only whether the studies are sufficiently credible to be considered *as part of* the total evidence that supports the" agency's decision. (*Laurel Heights I*, *supra*, at p. 409; accord, *State Water Resources Control Bd. Cases* (2006) 136 Cal.App.4th 674, 795.) An agency has the discretion to reject suggestions for additional testing if the EIR

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changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant."]), there is ample evidence in the record that construction activities and the placement of buildings over soils containing methane could cause methane to concentrate in areas, increasing the risk of explosion, and thereby cause an adverse physical change in the environment with respect to methane.

contains sufficient information and analysis to support the decision that no additional testing is needed. (*Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 102; *San Joaquin Raptor*, *supra*, 27 Cal.App.4th at p. 728.)

" '[T]he fact that there are differing opinions arising from the same pool of information is not grounds for holding the EIR inadequate. . . . [¶] . . . "[I]t is not required 'that the body acting on an EIR correctly solve a dispute among experts.' All that is required is that in substance the material in the EIR be responsive to the opposition, particularly where opinion and not fact is in issue. [Citation.]" ' (*Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 413 [200 Cal.Rptr. 237].) 'A court's task is not to weigh conflicting evidence and determine who has the better argument . . . . We have neither the resources nor scientific expertise to engage in such analysis, even if the statutorily prescribed standard of review permitted us to do so.' (*Laurel Heights Improvement Assn. v. Regents of University of California*, *supra*, 47 Cal.3d at p. 393.)" (*Cadiz Land Co. v. Rail Cycle*, *supra*, 83 Cal.App.4th at pp. 101-102.) A court, however, must not "uncritically rely on every study or analysis presented by a project proponent in support of its position. A clearly inadequate or unsupported study is entitled to no judicial deference." (*Laurel Heights I*, *supra*, 47 Cal.3d at p. 409, fn. 12.)

The draft EIR stated that the prior soil gas surveys performed on the phase two site would be supplemented by additional required testing at each building site and that a series of specified mitigation measures would be required depending on the concentrations measured at each building site. The topical response on methane gas

referenced and summarized that discussion in the draft EIR. In light of the required additional testing at each building site and the specified mitigation measures to be implemented based on the test results, we conclude that the evidence supports the reasonable conclusion that the prior methane testing discussed in the EIR was sufficient to establish a general site characterization and that no additional methane testing was needed prior to project approval.[23] The responses to comments adequately explained that the City declined to require additional methane testing prior to project approval for these reasons, and therefore were sufficient under CEQA. (Guidelines, § 15088, subd. (c).)

The formulation of specific mitigation measures ordinarily should not be deferred to a time after project approval. (Guidelines, § 15126.4, subd. (a)(1)(B).)[24]

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[23] Petitioners argue that the failure to mention in the draft EIR the ETI report recommending additional soil gas testing throughout the site was misleading and that the statement in the draft EIR that some of the prior testing was done "in coordination with ETI" was false. In light of the requirement of additional testing at each building site, we conclude that the failure to mention in the EIR the City's rejection of ETI's recommendation did not seriously undermine the information provided in the EIR or render the EIR insufficient as an informational document. Regarding the quoted statement, a letter from Playa Capital's environmental consultant Camp Dresser & McKee Inc. dated June 4, 2001, stated that the testing completed in January 2001 was in accordance with ETI's request for additional samples at specified locations, which supports the statement in the draft EIR that the testing was done "in coordination with ETI."

[24] "Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." (Guidelines, § 15126.4, subd. (a)(1)(B).)

Courts have recognized an exception to this general rule in some circumstances, however, if mitigation is known to be feasible at the time of project approval but the specific formulation and selection of mitigation measures is impractical at that time, provided that the EIR adequately discusses options for mitigation and the agency commits itself to mitigation based on specific performance standards. (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275-1276; *Sacramento Old City Assn v. City Council* (1991) 229 Cal.App.3d 1011, 1028-1029; see also Guidelines, § 15126.4, subd. (a)(2).) The situation here is distinct in that the EIR and the Playa Vista Methane Guidelines described the specific mitigation measures required for each building site depending on the level of methane concentration detected, and the City upon approving the project adopted those requirements as a condition to the issuance of each building permit. The City therefore did not defer the formulation of specific mitigation measures, but only deferred the determination of which specific methane mitigation measures would apply to each building site. In light of our conclusion that the City can require additional testing at each building site in lieu of requiring additional testing prior to project approval, we conclude that the determination of which of the specific methane mitigation measures adopted at the time of project approval apply to each building site can be made after the additional testing is performed.

d. *The Responses to Comments Concerning Phase One Methane Mitigation Were Adequate and Petitioners Have Not Shown that the Omission of Information from the EIR Rendered the EIR Inadequate*

Petitioners contend the EIR should have disclosed available data concerning the efficacy of the phase one methane mitigation systems because those systems are similar to the phase two methane mitigation measures, the failure to disclose that information rendered the EIR inadequate, and the City's responses to comments requesting that information were inadequate.

The state Department of Toxic Substances Control stated in a written comment that the draft EIR provided no specific information on the data collected through methane monitoring in the phase one project and that such information would be useful.[25] Grassroots Coalition and Friends of the Children commented that the phase two methane mitigation measures were based on similar systems installed in phase one, that those systems "included multiple experimental and immature technology," and that the EIR should disclose the monitoring data collected on the phase one site. Grassroots Coalition and Friends of the Children commented further that documents in the City's possession revealed the failure or lack of implementation of some of the phase one mitigation systems.

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[25] The comment by the Department of Toxic Substances Control stated: "The text on page 709 states that the Fountain Park Apartments on the Playa Vista phase I project is completely built. The EIR does not provide specific information on the methane controls actually installed in the Fountain Park Apartments. If monitoring has been installed it would be useful to provide data on the monitoring results."

The City's responses to those comments referred to the topical response on methane gas and parts of the draft EIR discussing methane gas, stated that the phase one project had been previously approved and had a separate EIR, and stated that the methane mitigation systems in the phase two project "will be tested, maintained and serviced by a licensed methane mitigation engineer to the satisfaction of the Fire Department and the Department of Building and Safety to make sure they work properly." The response to the latter comment also stated that it was unclear what documents the comment referred to and that the City and Playa Capital were not aware of any phase one mitigation system failure.

A certified EIR is presumed valid if no timely action or proceeding has been brought challenging its validity or if any timely lawsuit was unsuccessful. (Pub. Resources Code, § 21167.2; *Laurel Heights II*, *supra*, 6 Cal.4th at p. 1130.) At the time of the release of the final EIR for the phase two project, the certified phase one EIR had survived all of the challenges to its validity. To the extent the comments challenged the validity of the phase one EIR based on the purported inadequacy of the phase one methane mitigation measures, the City had no obligation to prove that those mitigation measures were adequate. To the extent the comments questioned the efficacy of the phase two methane mitigation measures based on the purported inefficacy and failure of the phase one methane mitigation measures, we conclude that the City provided a "good faith, reasoned analysis" (Guidelines, § 15088, subd. (c)) by explaining that the City and Playa Capital were unaware of any documented failure of the phase one systems and that the City will ensure that the phase two systems are tested and maintained by a

qualified engineer to ensure their proper functioning. Further information and data concerning the efficacy of the phase one methane mitigation systems might have been useful, but was not essential to an adequate response.

We conclude further that the absence of further information and data concerning the efficacy of the phase one methane mitigation systems did not render the EIR inadequate. Petitioners have not shown that the omitted information was essential to an understanding of the phase two methane mitigation measures, that the omitted information compels the conclusion that the phase two methane mitigation systems are inadequate, or that the City could not conclude based on other information in the record that the phase two methane mitigation measures are adequate.

e. *The Evidence Supports the City's Finding on Mitigation*

Petitioners contend the evidence does not support the City's finding that the adopted mitigation measures will reduce the methane gas impacts to an insignificant level. They cite letters from ETI and the City's Department of Building and Safety dated from May 2000 to January 2001 that purportedly stressed the importance of "deep vent wells" as part of a subsurface methane venting system. In light of this evidence, Petitioners argue that the omission of "deep vent wells" from the phase two methane mitigation measures compels the conclusion that the mitigation is ineffective. We disagree. Petitioners selectively cite a series of letters written in connection with the phase one mitigation measures, but fail to discuss either the context of those letters, the differences between the phase one and phase two mitigation systems, or the evidence in the record supporting the City's finding.

CEQA petitioners are not exempt from the ordinary rules of appellate review. An appellant challenging the sufficiency of the evidence must set forth all of the material evidence on point, and not only the evidence supporting the appellant's position. (*Foreman & Clark Corp. v. Fallon* (1971) 3 Cal.3d 875, 881; *State Water Resources Control Bd. Cases*, *supra*, 136 Cal.App.4th at p. 749; *Defend the Bay v. City of Irvine*, *supra*, 119 Cal.App.4th at p. 1266.) " 'When an appellant challenges an administrative decision as unsupported by substantial evidence in light of the record as a whole, it is [the] appellant's burden to demonstrate that the administrative record does not contain sufficient evidence to support the agency's decision.' [Citation.]
A recitation of only the part of the evidence that supports the appellant's position 'is not the "demonstration" contemplated under the above rule. [Citation.] Accordingly, if [the appellants contend] "some particular issue of fact is not sustained, they are required to set forth in their brief *all* the material evidence on the point and *not merely their own evidence*. Unless this is done the error is deemed to be waived." ' (*Foreman & Clark Corp. v. Fallon* (1971) 3 Cal.3d 875, 881 [92 Cal.Rptr. 162, 479 P.2d 362]; see *In re S.B.* (2004) 32 Cal.4th 1287, 1293, fn. 2 [13 Cal.Rptr.3d 786, 90 P.3d 746] [loss of right to challenge ruling on appeal properly termed forfeiture, not waiver].) Essentially, this rule rests on the premise that if the appellants fail to present us with all the relevant evidence, then the appellants *cannot* carry their burden of showing the evidence was insufficient to support the agency's decision because support for that decision may lie in the evidence the appellants ignore." (*State Water Resources Control Bd. Cases*, *supra*, at pp. 749-750, second bracketed insertion added.) Moreover, "the burden to provide a

fair summary of the evidence 'grows with the complexity of the record.' " (*Boeken v. Philip Morris Inc.* (2005) 127 Cal.App.4th 1640, 1658.)

Petitioners have failed to set forth a full statement of the evidence that may support the City's finding. We therefore conclude that Petitioners cannot satisfy their burden to show that the finding is not supported by substantial evidence and presume that the evidence supports the City's finding.

6. *Wastewater Impacts*

a. *Factual Background, the EIR, and the City's Findings*

Wastewater from the phase two project would be conveyed through existing sewers to the Hyperion Treatment Plant in Playa Del Rey. The Hyperion Treatment Plant together with two smaller wastewater treatment plants comprise the Hyperion Treatment System. After treatment at the Hyperion Treatment Plant, effluent is discharged into the Santa Monica Bay.

The City's CEQA Thresholds Guide, which was in draft form at the time the draft EIR was circulated, stated that a project normally would have a significant wastewater impact if "The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained," or if "The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements." (Draft L.A. CEQA Thresholds Guide, p. K.2-3.) The draft CEQA Thresholds Guide listed

several potential measures to mitigate such a significant impact, including measures to reduce the amount of wastewater generated by other properties in the vicinity of the project, use of a grey water system to reuse wastewater from the project, use of a holding tank to hold wastewater from the project during periods of peak wastewater flow for discharge to the sewer during off-peak periods, and expansion of the capacity of the City's wastewater treatment system.[26] (*Id.* at pp. K.2-5 to K.2-6.)

The EIR stated that the City's general plan stated a policy to provide for additional wastewater treatment capacity as necessary. The EIR stated that the City's existing Wastewater Facilities Plan was designed to address the City's wastewater treatment needs through 2010 and that a revised plan was then in development. The EIR stated that the revised plan would "assess[] projected wastewater needs for Los Angeles, identif[y] various means and options available for meeting those needs, and develop[] a technical framework for development of policies and a facilities plan to meet wastewater management needs through the 2020 planning horizon." The EIR stated further, "Alternatives that the City of Los Angeles has for meeting its projected shortfall include combinations of increasing capacity at HTP, building new reclamation capacity upstream of HTP, conservation of potable water, and infiltration/inflow reduction."

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[26] We take judicial notice of the draft L.A. CEQA Thresholds Guide dated May 14, 1998, which was cited in the draft EIR and made available to the public as part of the reference library for the project.

The EIR stated that the existing wastewater treatment capacity in the Hyperion Treatment System was sufficient to accommodate the average daily wastewater flows expected from the phase two project through 2010. The EIR stated further that beginning in 2010, wastewater flows during peak months even without the phase two project were expected to exceed the system's existing capacity of 550 million gallons per day (mgd) by 20 mgd, and that beginning in 2010, the phase two project would contribute an additional 1.12 mgd during peak months to an already overburdened system. The EIR stated that the exacerbation of the overburdening of the wastewater treatment system was a potentially significant impact, but that the impact would be reduced to a level of insignificance by enforcement of the City's sewer permit allocation ordinance. The EIR stated that the ordinance requires a property owner to demonstrate that there is sufficient collection and treatment capacity for the property's wastewater before a building permit is issued and before the property can be connected to the municipal sewer system.[27] The EIR therefore concluded that the project's direct

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[27] The sewer permit allocation ordinance (L.A. Ord. No. 166,060) establishes an "annual sewage allotment" of 5 million gallons and assigns portions of that allotment on a monthly basis to priority projects, public benefit projects, and nonpriority projects. It states that the City Council may reduce the annual sewage allotment "if the Council finds that a reduction is necessary to keep the annual sewer use within the treatment capacity of the Hyperion Treatment System." Thus, the ordinance provides that the system's limited treatment capacity can require a reduction of the annual sewer allotment. The ordinance states that the Department of Building and Safety can formally accept a set of plans and specifications for "plan checking" only after the Department of Public Works determines that "there is allotted sewer capacity available for such Project." It states further, however, that if there is no remaining monthly allotment, the project must be placed on a waiting list and that at the request of the applicant, the Department of Building and Safety "shall accept a set of plans and

wastewater impacts would be insignificant. The EIR stated a similar analysis and conclusion with respect to cumulative impacts.

The CEQA findings adopted by the City Council stated that the wastewater impacts during peak months would be insignificant because the project "would not be allowed to contribute wastewater flows to the local wastewater collection and treatment system unless adequate collection and treatment capacity demonstrably exists to handle such flows, as required by the City's Sewer Allocation Ordinance."

b. *The EIR Failed to Adequately Analyze Wastewater Impacts*

Petitioners contend the EIR improperly failed to acknowledge that the project would necessitate expansion of the City's wastewater treatment system and failed to analyze environmental impacts resulting from that expansion. The EIR acknowledged that the total wastewater flows into the Hyperion Treatment System would exceed the system's scheduled treatment capacity beginning in 2010 and that wastewater from the project would exacerbate that condition. The EIR stated, however, that significant impacts would be avoided by enforcing the ordinance that purportedly prevents the issuance of a building permit or a sewer connection unless adequate collection and treatment capacity exists. The EIR stated that the City was in the process of planning how to meet the City's future wastewater management needs, including the option of

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specifications for plan checking for a Project, even if the Project has been placed on the waiting list and a sewer permit has not yet been obtained from the Department of Public Works." The parties dispute whether the ordinance actually prevents the issuance of a building permit if the requirement is not satisfied and whether it actually prevents a sewer connection. We need not resolve that dispute.

increasing the system's treatment capacity, but did not state that the City had proposed or adopted any plan and did not discuss the impacts of the measures that may be required to treat the project's wastewater.

An EIR must analyze the environmental impacts of the proposed project (Pub. Resources Code, § 21100, subd. (b); Guidelines, § 15126.2), and in doing so must assume that the project will be built out and fully operational. (*Vineyard Area Citizens*, *supra*, 40 Cal.4th at pp. 431, 444; *Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 205-206 (*Stanislaus Natural Heritage*).) Both the use of water and its disposal and treatment are reasonably foreseeable activities for a land use project of this nature, so the impacts of providing water to the project and treating wastewater from the project are reasonably foreseeable consequences of the project that must be analyzed in an EIR. (*Vineyard Area Citizens*, *supra*, at p. 431 [water supply]; *Stanislaus Natural Heritage*, *supra*, at p. 206 [same]; *Napa Citizens*, *supra*, 91 Cal.App.4th at pp. 373-374 [water supply and wastewater treatment]; *San Joaquin Raptor*, *supra*, 27 Cal.App.4th at pp. 731-732 [required sewer expansion].) The failure to analyze those impacts would deprive the decision makers and the public of important information concerning the potential environmental impacts of the project.

Vineyard Area Citizens, *supra*, 40 Cal.4th 412 involved an EIR prepared for a community plan and a specific plan for a large, mixed-use development project. The EIR stated that the project would depend on both groundwater and surface water for its water supplies. (*Id.* at p. 423.) The projected long-term water supplies consisted of an unspecified combination of groundwater and surface water. (*Id.* at p. 440.) The EIR

stated that "conjunctive use" of groundwater and surface water, meaning greater reliance on surface water in wet years to allow groundwater resources to be recharged, and other measures would mitigate the environmental impacts of groundwater withdrawal. (*Id.* at pp. 423-424.) The EIR stated that a full analysis of the "conjunctive use" program must await the pending environmental review of a master plan update by the county water agency. (*Id.* at p. 440.) Because the project did not have legal rights to the projected water supplies, a mitigation measure provided that subdivision maps, building permits, and other entitlements would not be granted unless agreements and financing for the water supplies were in place. (*Id.* at p. 424.)

Vineyard Area Citizens, *supra*, 40 Cal.4th 412 stated, "An EIR for a land use project must address the impacts of *likely* future water sources, and the EIR's discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability. [Citation.]" (*Id.* at p. 432.) *Vineyard* held that the EIR was inadequate because it failed to identify the intended and likely long-term water sources and failed to analyze the environmental impacts of providing water to the project from the anticipated sources. (*Id.* at pp. 441, 444-445.) The Supreme Court rejected the argument by the City of Rancho Cordova that such an analysis would be duplicative of a future EIR that the county's water agency would be required to prepare for the future water supply project, and stated that the county (as predecessor to the newly incorporated city) could have either analyzed those impacts in the EIR for the current project or deferred approval of the current project until after the certification of an EIR for the water project and then tiered from that EIR. (*Id.* at p. 440.)

Vineyard Area Citizens, *supra*, 40 Cal.4th 412 stated with respect to the mitigation measure to withhold entitlements: "An EIR evaluating a planned land use project must assume that all phases of the project will eventually be built and will need water, and must analyze, to the extent reasonably possible, the impacts of providing water to the entire proposed project. (*Stanislaus Natural Heritage*, *supra*, 48 Cal.App.4th at p. 206.)" (*Id.* at p. 431.) "[A]n EIR may not substitute a provision precluding further development for identification and analysis of the project's intended and likely water sources. 'While it might be argued that not building a portion of the project is the ultimate mitigation, it must be borne in mind that the EIR must address the project and assumes the project will be built.' (*Stanislaus Natural Heritage*, *supra*, 48 Cal.App.4th at p. 206.)" (*Id.* at p. 444.) *Stanislaus Natural Heritage* similarly held that an EIR for a large residential community and resort project must identify and analyze the environmental impacts of the intended long-term water supplies and could not rely on a provision precluding further development in lieu of providing that analysis. (*Stanislaus Natural Heritage*, *supra*, 48 Cal.App.4th at pp. 205-206.)

Napa Citizens, *supra*, 91 Cal.App.4th 342 held that a subsequent EIR for an updated specific plan was inadequate because it failed to discuss alternative sources of water and wastewater treatment that might be needed if the anticipated but uncertain sources failed to materialize, and failed to discuss the environmental impacts of using those sources. *Napa Citizens* stated: "Because of the uncertainty surrounding the anticipated sources for water and wastewater treatment, however, the FSEIR also cannot simply label the possibility that they will not materialize as 'speculative,' and decline to

address it. The County should be informed if other sources exist, and be informed, in at least general terms, of the environmental consequences of tapping such resources. Without either such information or a guarantee that the resources now identified in the FSEIR will be available, the County simply cannot make a meaningful assessment of the potentially significant environmental impacts of the Project. [Citation.]" (*Id.* at pp. 373-374.) *Vineyard Area Citizens*, *supra*, 40 Cal.4th at page 430 discussed *Napa Citizens* and stated that *Napa Citizens* established the principle that, with respect to water supply: "[W]here even a full discussion leaves some uncertainty regarding actual availability of the anticipated future water sources, CEQA requires some discussion of possible replacement sources or alternatives to use of the anticipated water, and of the environmental consequences of those contingencies. (*Napa Citizens*, *supra*, 91 Cal.App.4th at p. 373.) The law's informational demands may not be met, in this context, simply by providing that future development will not proceed if the anticipated water supply fails to materialize. But when an EIR makes a sincere and reasoned attempt to analyze the water sources the project is likely to use, but acknowledges the remaining uncertainty, a measure for curtailing development if the intended sources fail to materialize may play a role in the impact analysis. (See *id.* at p. 374.)" (*Vineyard Area Citizens*, *supra*, at p. 432.)

The EIR here failed to identify the intended and likely measures for the City to accommodate the project's wastewater and failed to analyze the environmental impacts of employing those measures to treat the wastewater generated by the project. Some measure to provide for treatment of the project's wastewater will be necessary

beginning in 2010 when the Hyperion Treatment System is projected to exceed its capacity. The EIR stated that the alternatives included increasing the capacity of the Hyperion Treatment Plant, building new reclamation capacity upstream of that plant, water conservation, and infiltration or inflow reduction. The City's draft CEQA Thresholds Guide also described potential measures to relieve a constrained wastewater treatment system. The EIR, however, failed to identify the measures intended for implementation here or analyze their environmental impacts, and failed to analyze the impacts of alternative measures to accommodate the project's wastewater. Instead, the EIR relied on enforcement of the City's sewer permit allocation ordinance to preclude the issuance of a building permit or a sewer connection if the collection and treatment capacity is insufficient.

We conclude that the City cannot rely on the ordinance in lieu of identifying and analyzing the environmental impacts of the intended measures to provide for treatment of the project's wastewater and, if those measures are uncertain, analyzing the environmental impacts of alternative measures. (Cf. *Vineyard Area Citizens*, *supra*, 40 Cal.4th at pp. 432, 444.) As in *Vineyard Area Citizens*, *supra*, 40 Cal.4th at page 444 and *Stanislaus Natural Heritage*, *supra*, 48 Cal.App.4th at page 206, the EIR must assume that the project will be built out and fully operational and cannot avoid analysis of significant environmental impacts by assuming that the project might not be

completed.[28] Moreover, the City cannot merely rely on the stated policy in its general plan to "[p]rovide for additional wastewater treatment capacity in the Hyperion Service Area (HSA) as it becomes necessary" without identifying and analyzing the environmental impacts of the intended and likely measures to accomplish that. To simply assume a solution to the acknowledged problem of wastewater treatment for a large land use project without analyzing the environmental impacts, including the impacts of alternative measures if the intended measures are uncertain, would not serve CEQA's informational purpose of ensuring that the decision makers, and the public, are informed of the environmental consequences of their land use decision before it is made. (Cf. *Vineyard Area Citizens*, *supra*, at pp. 430-431.) The City must revise the EIR to identify the intended and likely measures to dispose of the project's wastewater and analyze the environmental impacts of employing those measures to dispose of the wastewater generated by the project, including direct and indirect project impacts (Guidelines, § 15126.2, subd. (a)) and cumulative impacts (*id.*, § 15130). (See section 10, *post*.)

Playa Capital and the City contend new information made available after the certification of the EIR shows that the City's wastewater treatment system will have sufficient capacity to accommodate the project's wastewater even during peak flow

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[28] In light of our conclusion that the EIR cannot rely on the sewer allocation permit ordinance to mitigate the project's significant wastewater impacts in lieu of analyzing those impacts, Petitioners' contention that the EIR must analyze those impacts because the City's draft CEQA Threshold Guide compels the conclusion that the impacts are significant is moot.

months. We need not decide whether it is appropriate for this court to consider that information in this appeal. In light of our conclusion that the EIR is inadequate on other grounds and that the EIR must be revised, the revised EIR should discuss and evaluate any pertinent new information.[29]

c. *The EIR Must Discuss any Cumulative Wastewater Impacts to the Santa Monica Bay*

Petitioners contend the EIR improperly failed to analyze environmental impacts to the Santa Monica Bay as cumulative impacts resulting in part from the project's wastewater discharge. The EIR discussed potential cumulative impacts with respect to sewer capacity but did not discuss potential cumulative impacts on water quality in the Santa Monica Bay.

An EIR must discuss significant cumulative impacts to which the project contributes an incremental amount. (Guidelines, § 15130, subd. (a).) "As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." (*Ibid.*) "The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (*Id.*, § 15355, subd. (b).) "The discussion

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[29] Playa Capital's and the City's joint request for judicial notice of the purported new information is denied.

of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness . . . ." (*Id.*, § 15130, subd. (b).) If the agency determines that a cumulative impact is insignificant, or "not cumulatively considerable" (*id.*, subd. (a)), the EIR must briefly explain that conclusion and "identify facts and analysis supporting" that conclusion. (*Id.*, subd. (a)(2).)

The EIR stated that water quality in the Santa Monica Bay is impaired and that treated wastewater, urban water runoff, and industrial and other discharges contribute to pollution in the bay. Yet the EIR neither discussed the potential cumulative impacts of expanding the wastewater treatment system to accommodate wastewater from the project and other sources, nor explained why the incremental effect of the project together with the impacts of other projects is not cumulatively considerable. In light of our conclusion that the City must revise the EIR to discuss the environmental impacts of the intended and likely measures to dispose of the project's wastewater, we conclude that the revised EIR must discuss the significant cumulative impacts to the Santa Monica Bay, if any, or explain its conclusion that there are no significant cumulative impacts.

Playa Capital and the City argue that the only cumulative impacts relating to wastewater that must be discussed in the EIR are impacts to the City's wastewater treatment system capacity, and that water quality impacts to the Santa Monica Bay resulting from increased discharge of treated wastewater need not be analyzed. They

argue that this is so because the City's CEQA Thresholds Guide and the checklist of environmental impacts in Appendix G of the Guidelines limited the required analysis of wastewater impacts to impacts on the wastewater system capacity. We disagree. The City's draft CEQA Thresholds Guide in its Wastewater chapter described potentially significant impacts to the wastewater system capacity, but did not limit the scope of analysis of resulting environmental impacts to only impacts on the system capacity. The Surface Water Quality chapter expressly stated that water quality may be impacted by pollutants discharged directly into receiving waters, including the Santa Monica Bay, from municipal wastewater treatment plants, and that such an impact normally would be considered significant if the discharge resulted in pollution, contamination, or nuisance as defined in Water Code section 13050 or resulted in a violation of regulatory standards. (Draft L.A. CEQA Thresholds Guide, *supra*, pp. D.2-2 to D.2-4.)

Appendix G of the Guidelines contains a checklist of environmental impacts that is provided as a sample form for use in preparing an initial study. (Guidelines, § 15064, subd. (f).) In the Utilities and Service Systems category, the checklist contains questions relating to the impact of the project on wastewater treatment system capacity. (Guidelines, Appendix G, p. 11.) Those questions relating to impacts on a public utility system do not suggest any limitation on the required analysis of impacts on water quality. In the Hydrology and Water Quality category, the checklist contains questions relating to impacts on water quality standards and on water quality in general. (*Id.* at pp. 7-8.)

Moreover, neither a threshold of significance established by a public agency pursuant to Guidelines section 15064.7 nor the checklist of environmental impacts in Appendix G of the Guidelines is conclusive. A public agency preparing an EIR cannot rely on a threshold of significance or the checklist to foreclose the consideration of evidence that a significant impact may result, but must apply its independent judgment to determine the significance of an impact in light of the particular project. (*Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109-1112.)

7. *"No Project" Alternatives*

a. *CEQA Requirements*

An EIR must discuss a reasonable range of potentially feasible alternatives to the proposed project and evaluate their comparative merits, as we have stated. (Pub. Resources Code, §§ 21002, 21002.1, subd. (a), 21100, subd. (b)(4); Guidelines, § 15126.6; *Goleta Valley*, *supra*, 52 Cal.3d at pp. 564-566; *Laurel Heights I*, *supra*, 47 Cal.3d at p. 400.) An EIR also must discuss a "no project" alternative and its environmental impact. (Guidelines, § 15126.6, subd. (e)(1).)[30] The purpose of this requirement is to facilitate a comparison between the environmental advantages and

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[30] "The specific alternative of 'no project' shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125)." (Guidelines, § 15126.6, subd. (e)(1).)

disadvantages of the proposed project and the environmental advantages and disadvantages that would result if the project were disapproved. (*Ibid.*; *Planning & Conservation League v. Department of Water Resources* (2000) 83 Cal.App.4th 892, 917-918.) To accomplish this objective, an EIR must discuss a "no project" alternative regardless of whether such an alternative is considered feasible. (*Planning & Conservation League*, *supra*, at pp. 917-918.) If the proposed project is the revision of an existing land use or regulatory plan, the "no project" alternative is the continuation of the existing plan into the future. (Guidelines, § 15126.6, subd. (e)(3)(A).) If the proposed project is development on identifiable property, the "no project" alternative assumes that the development will not occur. (*Id.*, subd. (e)(3)(B).)

The analysis of the "no project" alternative must include a discussion of the existing environmental conditions "as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (Guidelines, § 15126.6, subd. (e)(2).) "If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (*Id.*, subd. (e)(3)(B).)

An EIR that fails to discuss the likely consequences of project disapproval can deprive decision makers and the public of important information concerning the consequences of approving or disapproving the proposed project. "A detailed environmental analysis of every precise use that may conceivably occur is not necessary at this stage. [Citation.] The fact that precision may not be possible, however, does not mean that no analysis is required. 'Drafting an EIR . . . involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.' (Guidelines, § 15144.)" (*Laurel Heights I*, *supra*, 47 Cal.3d at pp. 398-399.)

b. *The Analysis of the First "No Project" Alternative Was Adequate with Respect to Use of the Property as a Treatment Wetlands*

The draft EIR discussed two "no project" alternatives, the first involving no development on the project site and the second involving development pursuant to the existing specific plan, as stated *ante*. Surfrider Foundation and Santa Monica Baykeeper commented that the draft EIR in its discussion of the first "no project" alternative should analyze the benefits of use of the property as a wetlands for natural treatment of surface water runoff in lieu of the proposed project. The comment stated that the City had previously acknowledged the benefits of diverting surface runoff to wetlands rather than increasing the burden on treatment facilities, and stated that the project site was one of the few remaining properties in the City appropriate for that use. The City responded by stating that use of the site as a treatment wetlands "does not represent a feasible alternative and would not meet the basic objectives of the Proposed

Project, as presented in . . . the Draft EIR." The response stated further that the project included some surface water runoff treatment in that the riparian corridor in the phase two project would drain into the freshwater marsh in the phase one project.

Petitioners contend the discussion of the first "no project" alternative was inadequate because it failed to analyze the benefits of use of the site as a treatment wetlands. They argue that use of the project site as a treatment wetlands for surface water runoff could reduce the future burden on the City's wastewater treatment system and provide significant environmental benefits that are not discussed in the draft EIR. They contend use of the site as a treatment wetlands should have been part of the "no project" alternative because such use would be a practical result of project disapproval. Petitioners also contend the response to the comment was inadequate because the response provided no valid reason why the discussion of the "no project" alternative did not consider use of the site as a treatment wetlands and no valid reason why use of the property as a treatment wetlands was infeasible.

The discussion of alternatives in the draft EIR included a brief description of potential alternatives that were considered but rejected as infeasible (see Guidelines, § 15126.6, subd. (c)). Among the rejected alternatives was a "habitat restoration" alternative that "could include passive open space and the creation of wetlands ecosystems." The draft EIR stated that the "habitat restoration" alternative was not analyzed further because it failed to satisfy nearly all of the project's objectives and "there is no indication that funding for such alternative[] would be available." In addition to the comment and response cited by Petitioners, a comment by Grassroots

Coalition and Friends of the Children stated that the first "no project" alternative should consider the benefits of potential use of the property for habitat and wetlands to "cleanse the runoff of Ballona Creek." The City's response to this comment referred to the brief discussion in the draft EIR of the "habitat restoration" alternative that had been considered but rejected as infeasible.

We conclude that the response to the comment by Surfrider Foundation and Santa Monica Baykeeper was adequate when viewed in context together with the discussion in the draft EIR of the potential "habitat restoration" alternative and the response to the comment by Grassroots Coalition and Friends of the Children. The response to the latter comment and the discussion in the draft EIR referenced in response to that comment explained in sufficient detail that the City considered use of the property as a treatment wetlands to be infeasible due to lack of funding and that the draft EIR did not analyze the alternative further because it would not satisfy most of the project's objectives.

The question whether the first "no project" alternative should have included an analysis of the benefits of use of the property as a treatment wetlands depends on whether that use "would be reasonably expected to occur" (Guidelines, § 15126.6, subd. (e)(2)) if the proposed project were disapproved or, in other words, whether that use would be "the practical result of the project's non-approval" (*id.*, subd. (e)(3)(B)). The draft EIR concluded that use of the property as a treatment wetlands would not be a practical result of the project's disapproval for the reasons stated. We review that conclusion under the substantial evidence standard. (*Laurel Heights I, supra*, 47 Cal.3d

at p. 407.) Petitioners cite evidence that the City considered the creation of treatment wetlands a desirable means to treat surface water runoff in lieu of relying on the wastewater treatment system, but cite no evidence that would compel the conclusion that the funds necessary to create such a wetlands at the project site--including funds to purchase or condemn the property--were available to the City. We therefore conclude that Petitioners have shown no abuse of discretion in this regard.

c. *The Analysis of the First "No Project" Alternative Was Adequate with Respect to Remediation of Contamination*

The EIR began with an executive summary, including a summary of the analysis of project alternatives. The summary stated that the first "no project" alternative would avoid impacts that would result from the proposed project, but stated further that the alternative "would produce . . . adverse environmental impacts . . . by omission of improvements associated with the Proposed Project." It suggested that the proposed project would result in the remediation of groundwater pollution that would not be remediated under the first "no project" alternative: "[T]he Proposed Project's design would result in implementation and completion of privately funded remediation of existing public safety concerns in the area (i.e., localized flooding, bluff stability, and surface and ground water pollution), which would not be implemented under the No Project Alternative."

The full discussion of alternatives in the EIR, unlike the executive summary, stated that the property was subject to a cleanup and abatement order issued by the California Regional Water Quality Control Board and that the remediation of ground

water pollution would occur even if there were no development on the property. It stated that the first "no project" alternative would result in no adverse impacts to groundwater quality.

BEEP contends the analysis of the first "no project" alternative was misleading because it falsely stated that the remediation of soil and groundwater contamination would not continue without development on the site. We conclude that the EIR viewed as a whole was not misleading in this regard. Despite the inaccurate statement in the executive summary, the full discussion of alternatives in the EIR stated unequivocally that the remediation would continue even if there were no development on the site and that the "no project" alternative would result in no adverse impacts to groundwater quality. "The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." (Guidelines, § 15151.) The EIR viewed as a whole satisfies that standard on this issue.

d. *The Analysis of the Second "No Project" Alternative Was Adequate with Respect to Traffic Impacts*

BEEP contends the analysis of the second "no project" alternative was misleading because it falsely stated that the alternative would result in significant traffic impacts, contrary to the conclusion of the City's own traffic study. BEEP argues that by overstating the traffic impacts of the second "no project" alternative, the EIR unfairly caused the alternative to appear less advantageous over the project with respect to traffic impacts than it actually is.

Playa Capital and the City argue that BEEP failed to exhaust its administrative remedies on this issue because no person raised this objection to the EIR during the public comment period. We disagree. Public Resources Code section 21177, subdivision (a) states that no action or proceeding can be brought to challenge a public agency's compliance with CEQA unless the alleged grounds for noncompliance were presented to the agency "by any person during the public comment period provided by this division or prior to the close of public hearing on the project before the issuance of the notice of determination." Subdivision (b) states that no person can maintain such an action or proceeding unless that person objected to approval of the project "during the public comment period provided by this division or prior to the close of the public hearing on the project before the issuance of the notice of determination." Thus, a person who objected to approval of the project during the public comment period or at any time prior to the close of the public hearing on the project and before the issuance of the notice of determination can litigate issues that were raised by that person, or by any other person, during that time. Contrary to the respondents' argument, the issues that can be litigated are not limited to issues raised during the public comment period, but include all issues raised by any person prior to the close of the public hearing on the project and before the issuance of the notice of determination. (*Bakersfield Citizens for Local Control v. City of Bakersfield, supra,* 124 Cal.App.4th at p. 1201; *Federation of Hillside &Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1263 (*Federation of Hillsides*)

BEEP submitted written comments to the City's planning commission in July 2004 and to the City Council in September 2004. The comments challenged the proposed CEQA finding that the second "no project" alternative "would continue to generate significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the Proposed Project" BEEP questioned the basis for the proposed finding, stated that it was contradicted by the traffic study, and cited appropriate pages of the traffic study. We conclude that BEEP adequately raised the issue before the close of public hearings on the project and before the notice of determination.

The second "no project" alternative limited development on the phase two site to only 108,050 square feet of office space, the maximum permitted on the site under the then-existing specific plan, and no residential, retail, or community-serving uses. A traffic study prepared for the City and included in an appendix to the EIR stated that the alternative would generate 1,568 daily vehicle trip ends versus 24,220 daily trip ends for the proposed project. A table showed projected morning and afternoon peak-hour traffic flows at 218 intersections as of 2010 and indicated that the alternative would result in no significant impact at any of those intersections. The traffic study stated, "It can be observed from this table that this alternative does not produce any significant traffic impacts at any of the analysis locations, compared to 14% and 22% of

the locations impacted by the Proposed Project during the same respective peak hours."[31]

Contrary to the traffic study, the EIR's executive summary stated that the second "no project" alternative "would continue to generate significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the Proposed Project." Similarly, the full discussion of alternatives in the EIR stated with regard to the second "no project" alternative: "Per this analysis [i.e., the traffic study], the alternative produces significant traffic impacts at approximately 1 percent and 0 percent of the analysis locations in the A.M. and P.M. peak hours, respectively, compared to 14 percent and 22 percent of the locations impacted by the Proposed Project during the same respective peak hours. Therefore, on an overall basis, this alternative would adversely impact traffic to a lesser degree than the Proposed Project." A summary at the end of the full discussion of the second "no project" alternative also stated that the alternative "would continue to generate

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[31] The study stated further that the projected baseline conditions as of 2010 with no additional development on the site were that 84 and 104 of the intersections would operate at unacceptable levels of service (rated E or F) during morning and afternoon peak hours, respectively. It stated that the second "no project" alternative would result in 83 and 104 of the intersections operating at unacceptable service levels during those respective hours. The decrease from 84 to 83 in the number of intersections projected to operate at unacceptable service levels in the morning peak hours was due to street improvements to McConnell Avenue that were part of the phase two project and apparently were also included in the second "no project" alternative. The study stated that the proposed project would result in 90 and 108 of the intersections operating at unacceptable levels of service during the morning and afternoon peak hours, respectively.

significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the Proposed Project." A table following that summary comparing impacts of the alternative with those of the project, however, stated that traffic impacts of the alternative would be "Non-Significant." The findings adopted by the City Council stated that the second "no project" alternative would generate "significant impacts on traffic . . . although at reduced levels compared to the Proposed Project."

We view the inaccuracies and inconsistencies in the EIR with respect to the traffic impacts of the second "no project" alternative as minor imperfections that did not seriously impede a proper understanding of the relative impacts of that alternative and the proposed phase two project with respect to traffic. The proposed project obviously involved much more intensive development and corresponding greater impacts before mitigation, as the EIR acknowledged. Whether the traffic impacts of the second "no project" alternative were significant but reduced from those of the project as stated in the EIR or insignificant as stated in the traffic study did not make so much practical difference as to render the EIR inadequate as an informational document. (See Guidelines, § 15151.)

e. *The Analysis of the Second "No Project" Alternative Was Adequate with Respect to Solid Waste Impacts*

The EIR executive summary stated that the second "no project" alternative "would continue to generate significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the

Proposed Project." The full discussion of alternatives in the EIR stated that the second "no project" alternative would generate 0.324 tons per day of solid waste, compared with 18.917 tons per day for the proposed project. It stated that both figures were before waste diversion and that waste diversion would substantially reduce the amount of waste requiring landfill disposal. The full discussion stated that the alternative would generate 98.3 percent less solid waste than the proposed project and stated, "As with the Proposed Project, this alternative would have a significant impact on solid waste generation." A summary at the end of the full discussion of the second "no project" alternative also stated that the alternative "would continue to generate significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the Proposed Project." A table following that summary comparing impacts of the alternative with those of the project stated that solid waste impacts of the alternative would be significant and stated, "Any exacerbation in demand is considered significant."

BEEP contends the characterization of the solid waste impacts of both the alternative and the project as significant despite the vast difference in the degree of the impacts was misleading. We disagree. The EIR quantified the difference between the amount of solid waste that would be generated by the second "no project" alternative and the amount that would be generated by the project, consistently stated that the solid waste impacts of the alternative would be less than those of the project, and was not misleading in this regard. BEEP also argues that the percentage difference between the solid waste impacts of the alternative and those of the project were understated because

the impacts were measured before waste diversion by recycling. Both the impacts of the alternative and those of the project were measured before waste diversion. Absent any evidence to the contrary, we conclude that reducing those impacts by the same percentage to account for recycling rates would maintain the same percentage difference between the solid waste impacts of the alternative and those of the project.[32]

8. *Transportation*

a. *The Vehicle Trip Distribution Analysis Was Adequate*

Petitioners contend the traffic impacts analysis in the EIR was based on faulty projections principally with respect to vehicle trips from the project for employment elsewhere. They argue that the EIR minimized traffic impacts on Santa Monica and the westside of Los Angles. They criticize the " 'technical' " and " 'complex' " traffic analysis based largely on their own anecdotal information and purported common sense, and based on what they characterize as a contradiction between marketing of the phase two project that emphasized its proximity to Santa Monica and the westside of Los Angeles to the north of the project and projections in the EIR that a large volume of the employment-related vehicle trips from the project will be to areas south of the project.

The EIR stated that the trip distribution for traffic expected to be generated by the project was determined using a "gravity model" that distributed trips "in proportion

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[32] BEEP briefly makes the same argument with respect to construction impacts measured before mitigation. We reject the argument for the same reason.

to the size of the attracting zones and inversely proportional to the distance or travel time between the zones." Petitioners' challenge to determinations made using the gravity model is effectively a challenge to the City's use of that model and its reliance on the resulting data. Challenges to the methodology for studying an impact and the reliability or accuracy of the data present factual questions, so we must reject such a challenge if substantial evidence supports the agency's decision as to those matters and the EIR is not clearly inadequate or unsupported. (*Federation of Hillside, supra*, 83 Cal.App.4th at p. 1259.) "When a challenge is brought to studies on which an EIR is based, 'the issue is not whether the studies are irrefutable or whether they could have been better. The relevant issue is only whether the studies are sufficiently credible to be considered *as part of* the total evidence that supports the' agency's decision. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 409 [253 Cal.Rptr. 426, 764 P.2d 278].) 'A clearly inadequate or unsupported study is entitled to no judicial deference.' (*Id.* at p. 409, fn. 12.) The party challenging the EIR, however, bears the burden of demonstrating that the studies on which the EIR is based 'are clearly inadequate or unsupported.' (*Ibid.*)" (*State Water Resources Control Bd. Cases*, *supra*, 136 Cal.App.4th at p. 795.)

Petitioners have not shown that the traffic study relied on in the EIR was clearly inadequate or unsupported with respect to its trip distribution analysis. Instead, Petitioners have shown only a difference of opinion that the City, rather than the courts, was entrusted to resolve. The same is true with respect to Petitioners' related arguments that trip distribution determinations should have been based on the actual driving

patterns of phase one residents rather than derived from more general data, that the City should have used the methodology commonly used by the City of Santa Monica, and that the analysis of neighborhood street impacts was misleading. Petitioners have not shown that the methodology used in the traffic study was clearly inadequate or unsupported.

b. *Petitioners Have Not Shown that the City's Reliance on SCAG Data Was Improper*

The City in a response to comments on the draft EIR stated that the trip distribution data derived from the gravity model were verified by reference to "Southern California Association of Government's (SCAG's) travel demand forecasting model database, to identify projected employment growth" in areas surrounding the project. Petitioners argue that the SCAG forecast was adopted in 1994 and was outdated and inaccurate, that SCAG adopted a more current version in 2004, and that the EIR therefore was misleading.

The fact that the draft EIR was circulated in August 2003 explains why a SCAG forecast adopted the following the year was not considered in the draft EIR. Petitioners do not state whether the 2004 SCAG forecast was released before the completion of the final EIR, after completion of the final EIR but before its certification, or after certification of the final EIR by the City Council, and do not argue that the City was required to revise and recirculate the EIR or that the City was required to prepare a subsequent EIR or a supplement to the EIR addressing the new information. Petitioners' sole argument on this point is that the traffic impacts analysis in the EIR

was misleading because some of the information used to verify the trip distribution data was outdated and unreliable. Petitioners do not meaningfully analyze the differences between the 1994 and 2004 SCAG forecasts and have not shown that reliance on the 1994 SCAG forecast rendered the traffic study clearly inaccurate or unsupported, and therefore have not shown an abuse of discretion. (*State Water Resources Control Bd. Cases*, *supra*, 136 Cal.App.4th at p. 795; *Federation of Hillside*, *supra*, 83 Cal.App.4th at p. 1259.)

c. *Petitioners Have Not Shown that the City's Reliance on Caltrans Data Was Improper*

A table in the draft EIR stated daily freeway traffic volumes as of 2003 on eleven freeway segments. The draft EIR projected traffic conditions in 2010 and analyzed the project's traffic impacts with respect to the baseline conditions in 2010. The Department of Transportation (Caltrans) commented that the actual traffic volumes in 2003 were much higher as shown in its latest published data and suggested that the table be modified to reflect the higher volumes. The City responded that the most recent Caltrans data available at the time the draft EIR was prepared were from 2001, and that the 2002 figures that were published later did not differ significantly from the 2003 traffic volume projections stated in the draft EIR. The response stated that the 2002 Caltrans figures were greater than the projected 2003 figures stated in the draft EIR in only two of the eleven freeway segments, and that those differences were not material and did not exceed the normal yearly fluctuations in traffic volumes.

Petitioners contend the City should have modified its analysis to reflect the updated data and its response to the comment was inadequate. We conclude that the differences between the 2002 Caltrans figures and the projected 2003 figures stated in the draft EIR were not so great as to compel the conclusion that the figures in the draft EIR were materially misleading or that the EIR was clearly inadequate. Because Petitioners do not meaningfully discuss those figures, neither will we. We conclude further that the response to the Caltrans comment adequately explained the City's reasons for rejecting the suggestion in the comment.

d. *The Analysis of Public Bus Lines Was Adequate*

The draft EIR listed public bus lines serving the project vicinity, including six lines operated by the Los Angeles County Metropolitan Transportation Authority, six operated by Culver City Bus, three operated by Santa Monica Municipal Bus Lines, and three operated by the City of Los Angeles Department of Transportation. It stated that two of the Culver City bus lines (lines 2 and 6) and one of the Santa Monica bus lines (line 3) were currently experiencing overcrowding. It stated that the phase one project would improve conditions on Santa Monica line 3 by adding four buses to increase operating frequencies. It stated that to mitigate the impacts of the phase two project on the Culver City bus lines, the project would provide funds to purchase four additional buses for Culver City lines 2, 4, and 6 to increase service frequencies and extend the line 4 route, and two additional buses to establish a new limited-stop Culver City bus

route.[33] The draft EIR stated that those mitigation measures would resolve the current operational deficiencies and would reduce the project's impacts to both individual bus lines and the bus transit system as a whole to an insignificant level.

Petitioners contend the analysis of impacts on individual bus lines was inadequate because the EIR failed to analyze whether the addition of buses to Santa Monica line 3 would alleviate the impacts of the phase two project, failed to address the current ridership of Santa Monica line 8, and failed to analyze the impacts of the phase two project on Santa Monica lines 8 and 14. We conclude that the absence of a specific discussion of those matters in the EIR did not render the analysis inadequate. The EIR and the supporting traffic study both stated that those routes were included in the overall analysis, that the transit agencies had provided the ridership figures available at the time, and that the proposed mitigation measures would reduce the project's impacts to individual bus lines to an insignificant level. The EIR provided sufficient information on this subject to serve its purpose as an informational document, and the purported deficiencies with respect to the level of detail discussed in the EIR did not render the analysis inadequate. We also reject Petitioners' argument that the EIR failed to adequately analyze the project's impacts on the bus transit system as a whole. Petitioners fail to show that the discussion in the EIR was inadequate as to either individual bus lines or the bus transit system as a whole.

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[33] The City later modified the traffic mitigation measures in response to suggestions by Culver City, enhancing the required signal system improvements and reducing the total number of buses to be purchased from six to five.

e. *The Evidence Supports the City's Finding on Mitigation of Transportation Impacts with Respect to Culver City Buses*

BEEP contends there is no enforceable provision for adequate funding of the ongoing operation of the Culver City buses to be added to mitigate impacts on traffic and public transit, and therefore no substantial evidence that the mitigation measure is feasible and enforceable and no evidence to support the City's finding that those impacts will be mitigated to an insignificant level. We disagree.

A public agency must mitigate or avoid the significant environmental effects of a project that it carries out or approves if it is feasible to do so. (Pub. Resources Code, § 21002.1, subd. (b); *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 359 (*City of Marina*).) Mitigation measures adopted by the agency must be fully enforceable. "A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures." (Pub. Resources Code, § 21081.6, subd. (b).) "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." (Guidelines, § 15126.4, subd. (a)(2).) The agency must find, based on substantial evidence, that the adopted mitigation measures are "required in, or incorporated into, the project" and that those measures will "mitigate or avoid significant effects on the environment." (Pub. Resources Code, § 21081.6, subd. (b).)[34] "The purpose of these requirements is to

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[34] The agency must find as to each significant effect, based on substantial evidence, that (1) mitigation measures required in or incorporated into the project will avoid or

ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded. [Citation.]" (*Federation of Hillside, supra*, 83 Cal.App.4th at p. 1261, italics omitted.)

A public agency's payment to a third party of funds needed to implement measures within the control of the third party to mitigate the environmental effects of a project can be a feasible form of mitigation. (*City of Marina, supra*, 39 Cal.4th at pp. 359-360.) The agency need pay no more than is necessary to mitigate the effects of the project and need not pay to mitigate effects caused by others. (*Id.* at pp. 361-362.) " 'Of course, a commitment to pay fees without any evidence that mitigation will actually occur is inadequate.' [Citations.]" (*Id.* at p. 365.) The adequacy of such a mitigation measure, including the amount of the agency's payment and the degree of assurance that the mitigation will actually occur, is determined by the agency subject to judicial review for abuse of discretion. (*Id.* at pp. 361, 365.)

Federation of Hillside, supra, 83 Cal.App.4th 1252 involved an amendment to the City's general plan. The EIR described a Transportation Improvement Mitigation Plan (TIMP) proposed by the City as a program to mitigate the transportation impacts of the amended general plan's land use and growth policies, and stated that the mitigation

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substantially lessen the significant effect; (2) those measures are within the exclusive jurisdiction of another public agency and have been adopted, or can and should be adopted, by that agency; or (3) specific economic, legal, social, technological, or other considerations make the mitigation measures identified in the EIR infeasible, and specific overriding economic, legal, social, technological, or other benefits outweigh the significant environmental effects. (Pub. Resources Code, §§ 21081, 21081.5; Guidelines, § 15091, subds. (a)-(c).)

measures included in the TIMP would reduce those transportation impacts to a level of insignificance. (*Id.* at pp. 1255-1256.) The TIMP stated that the program's implementation would require the cooperative efforts of various public agencies together with the City at a cost of approximately $12 billion. (*Id.* at p. 1256.) It stated that a preliminary analysis showed that the City's portion of the cost would far exceed the City's anticipated revenues. (*Ibid.*) The City acknowledged that there was great uncertainty as to whether the mitigation measures would ever be funded or implemented. (*Id.* at p. 1261.) Although the City adopted the mitigation measures included in the TIMP, it did not require that those measures be implemented as a condition of the development permitted in the amended general plan and made no provision to ensure that the mitigation measures would actually be implemented. (*Ibid.*) In light of the remote and speculative nature of the proposed mitigation and absent any enforceable commitment to implement the TIMP or any reasonable basis to conclude that the mitigation would actually occur, we concluded that there was no substantial evidence to support a finding that the mitigation measures were "required in, or incorporated into" (Pub. Resources Code, § 21081, subd. (a)(1)) the project. (*Federation of Hillside, supra*, at p. 1261.)

City of Marina, supra, 39 Cal.4th 341 involved a plan for the expansion of a university campus on a former army base, Fort Ord. The EIR stated that the mitigation of the project's environmental effects would require improvements to Fort Ord's infrastructure outside the campus. (*Id.* at p. 351.) The Fort Ord Reuse Authority (FORA) had established a plan for the future use and development of the base,

including infrastructure improvements.[35] (*Id.* at pp. 346-347.) FORA had assumed that the university would pay its share of the cost of infrastructure improvements, but the Board of Trustees refused to contribute any amount toward the cost of the improvements. (*Id.* at p. 351.) In approving the project, the board found that the improvements were the responsibility of FORA, that mitigation was infeasible because the board was legally prohibited from contributing funds to FORA for that purpose, and that the project offered overriding benefits that outweighed any remaining unmitigated environmental effects. (*Ibid.*) *City of Marina* held that the findings that mitigation was not the board's responsibility and that mitigation was infeasible were based on erroneous legal assumptions and therefore were legally erroneous. (*Id.* at pp. 355-356.) *City of Marina* stated, " . . . CEQA requires the Trustees to avoid or mitigate, if feasible, the significant environmental effects of their project (Pub. Resources Code, § 21002.1, subd. (b)) and . . . payments to FORA may represent a feasible form of mitigation." The court stated that the board's payment should be " ' "roughly proportional" ' " to the effects of the project and that the board "need not pay to mitigate effects caused by other users of the base." (*City of Marina*, *supra*, at pp. 361-362.)

City of Marina stated further that "unavoidable uncertainties affecting the funding and implementation of the infrastructure improvements . . . do not render voluntary contributions to FORA by the Trustees infeasible as a method of mitigating"

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[35] FORA was created by the Legislature to govern Fort Ord and manage the transition of the base from military to civilian uses. (*City of Marina, supra*, 39 Cal.4th at p. 346.)

the environmental effects of the project. (*City of Marina*, *supra*, 39 Cal.4th at p. 364.) The court stated, " 'Of course a commitment to pay fees without any evidence that mitigation will actually occur is inadequate. [Citations.]' " (*Id.* at p. 365.) The court concluded, however, that there was "no reason to doubt" that FORA would comply with its statutory obligation to prepare Fort Ord for civilian development by constructing the needed infrastructure, and noted that FORA possessed a broad range of fundraising powers to accomplish that task. (*Ibid.*) The court presumed that FORA would comply with its statutory obligation and concluded that FORA's development plan was a reasonable plan for mitigation and that the board's voluntary payments to FORA would be a feasible method of mitigating the environmental effects of the project. (*Ibid.*)

The City entered into a contract with Culver City in which the City agreed to provide the funds necessary to purchase the additional buses and to pay a portion of their operating costs.[36] The contract is an enforceable agreement. Moreover, the contract supports a reasonable assumption that Culver City intends to provide the remaining funds necessary to operate the buses, and there is no indication either that the City lacks the funds necessary to satisfy its obligations under the contract or that Culver City is unlikely to provide the remaining funds necessary to operate the buses. Our

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[36] The City agreed to pay 100 percent of the operating costs for the new buses for the first three years and 15 percent for the following seven years. The amount of operating costs is determined by an hourly rate of $85 multiplied by the actual number of peak hours of operation, limited to 7.5 hours per day per bus and 250 days per year for four of the buses and limited to 12.5 hours per day and 250 days per year for a fifth bus.

concerns expressed in *Federation of Hillside, supra,* 83 Cal.App.4th 1252 that the City had made no enforceable commitment to fund its share of the costs of the mitigation measures and that there was no reasonable basis to conclude that the mitigation would actually occur therefore are not present here. The City's payment obligation to Culver City is more akin to the proposed payments by the board of trustees to FORA in *City of Marina*, which the court found were a feasible means to mitigate the environmental effects of the project. Similarly here, we conclude that the City's payment obligation under its contract with Culver City is a feasible form of mitigation, that Petitioners have cited no evidence showing any serious doubt as to Culver City's intent or ability to provide the remaining funds necessary to operate the buses, and that substantial evidence supports the City's finding that the related impacts will be mitigated to an insignificant level.

f. *BEEP Has Not Shown an Abuse of Discretion with Respect to Condition 116*

Among the conditions imposed by the City on its approval of the vesting tentative map for the phase one project was condition 116. Condition 116, as quoted in the phase two final EIR, stated: " 'The maximum average number of P.M. peak hour off-site automobile trips generated by the cumulative total of First Phase office space shall be limited to 1,493.' " " 'The failure to achieve the [Playa Vista First Phase Project] trip reduction goal will result in a corresponding decrease in total office entitlement for the Playa Vista Master Plan Project as a whole.' " BEEP contends the City cannot approve the development of any office space in phase two until it

determines whether the number of vehicle trips generated by the phase one office space actually exceeds the stated limit and cannot determine whether that is true until after phase one is built out and fully occupied. BEEP argues that the City failed to proceed in a manner required by law by failing to comply with condition 116 in this manner.

The City stated in response to comments on the phase two draft EIR that at the time condition 116 was adopted, the master plan for the entire Playa Vista development area provided for a total of 5,280,000 square feet of office space, that phase one included 3,206,950[37] square feet of office space and phase two included 175,000 square feet of office space, and that the total office space component in the entire Playa Vista development therefore had already been reduced by 36 percent from the amount allowed at the time condition 116 was adopted. The response stated that the 36-percent reduction in office space corresponded to approximately 2,200 peak-hour trips and that the number of trips generated by the phase one office space therefore must exceed approximately 3,700 trips before condition 116 could require a further reduction of office space in phase two. The response stated that the draft EIR accounted for phase one vehicle trips as part of the 2010 baseline conditions and that based on that analysis, the City determined that the threshold of 3,700 trips would not be reached.

We find the City's explanation persuasive. Even if the phase one office space after build out were to generate more than 1,493 peak-hour trips, requiring a reduction

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[37] This figure apparently included 2,806,950 square feet of office and light industrial space and 400,000 square feet of regional mixed commercial space.

in the amount of office space allowed for the Playa Vista development as a whole, the amount to be reduced would be the 5,280,000 square feet of office space contemplated for the entire development (in the words of condition 116, " 'the Playa Vista Master Plan Project as a whole' ") at the time condition 116 was adopted, rather than the considerably smaller amount of office space actually approved for the entire development. The EIR's analysis of traffic impacts as of 2010, including traffic anticipated to be generated by the phase one project, supports the conclusion that the phase one office space will not generate peak-hour trips sufficient to require a reduction in the amount of phase two office space. Contrary to BEEP's argument, condition 116 neither expressly nor impliedly requires the City to withhold approval of any phase two office space until phase one is built out and fully occupied, in these circumstances.

9. *Statement of Overriding Considerations*

BEEP contends the statement of overriding considerations adopted by the City was inadequate because it failed to explain in sufficient detail the City's balancing of competing benefits and impacts of the phase two project. The statement of overriding considerations stated that specific project benefits outweighed the adverse environmental effects and identified 27 project benefits, including among others the provision of housing, jobs, and recreational spaces in a mixed-use community and the conservation and enhancement of natural resources, including bluff restoration and creation of a riparian corridor.

An agency can approve a project that will cause significant environmental effects if it finds that specific project benefits make the mitigation measures and alternatives

identified in the EIR infeasible and that those benefits outweigh the adverse environmental effects. (Pub. Resources Code, § 21081, subd. (b); Guidelines, § 15091, subd. (a)(3).) "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.' " (Guidelines, § 15093, subd. (a).) "When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record." (*Id.*, subd. (b).) Guidelines section 15021, subdivision (d) states further: "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment."

A decision to approve a project despite its significant environmental effects is a policy decision. A statement of overriding considerations must comply with CEQA's procedural requirements that it state the "specific reasons" (Guidelines, § 15093, subd. (b)) for that policy decision and "reflect the ultimate balancing of competing public objectives" (*id.*, § 15021, subd. (d)), and the asserted factual basis for the policy decision must be supported by substantial evidence in the administrative record (Guidelines, § 15093, subd. (b); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1223-1224), but the statement need not describe in detail the weight accorded to the various competing interests or other detailed aspects of the balancing analysis. Rather, a statement of overriding considerations "reflect[s] the ultimate balancing of competing public objectives" (Guidelines, § 15021, subd. (d)) if it identifies the benefits (i.e., the "specific reasons" (*id.*, § 15093, subd. (b)) that outweigh the environmental effects identified in the EIR. (See *San Francisco Ecology Center v. City and County of San Francisco* (1975) 48 Cal.App.3d 584, 596.) We conclude that the City's statement of overriding considerations complied with these requirements by identifying the benefits of the project.

10. *Appropriate Remedies*

Public Resources Code section 21168.9, subdivision (a) states that if a court finds that an agency failed to comply with CEQA, the court must do one or more of the following: (1) mandate that the agency vacate the determination, finding, or decision, in whole or in part; (2) if the court finds that specific project activities will prejudice the consideration or implementation of mitigation measures or alternatives, enjoin any

project activities that could result in an adverse change to the physical environment until the agency has complied with CEQA; and (3) mandate that the agency take specific action necessary to comply with CEQA. The relief must be limited to what is necessary to achieve compliance with CEQA. (*Id.*, subd. (b).) The relief can be limited to those portions of the determination, finding, or decision or to specific project activities that are not in compliance with CEQA, but only if the court finds that those portions or activities are severable, that severance will not prejudice full compliance with CEQA, and that the remainder of the project is not in noncompliance with CEQA. (*Ibid.*) "The court must specify what action by the agency is necessary to comply with CEQA (§ 21168.9, subd. (b)) but cannot direct the agency to exercise its discretion in a particular way (§ 21168.9, subd. (c))." (*Federation of Hillside, supra*, 83 Cal.App.4th at p. 1266.)

We conclude that the misleading analysis of land use impacts, failure to discuss preservation in place of historical archaeological resources, and failure to properly analyze wastewater impacts rendered the EIR as a whole deficient as an informational document, and that these matters collectively are not severable from the project as a whole. The City can achieve full compliance with CEQA only by vacating the project approvals that were based on the certified EIR and revising the EIR to remedy these deficiencies.[38] Only then can the City properly certify a revised EIR and grant the

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[38] The project approvals that were based on the EIR include the approvals of a vesting tentative map, general plan amendments, specific plan amendments, and a development agreement.

project approvals. The form of the document used to revise the EIR and whether recirculation of the EIR is necessary are questions for the City to decide in the first instance under the standards governing recirculation of an EIR before certification (Pub. Resources Code, § 21092.1; Guidelines, § 15088.5). (*Protect the Historic Amador Waterways v. Amador Water Agency*, *supra*, 116 Cal.App.4th at p. 1112.)

Public Resources Code section 21168.9, subdivision (a)(2) also authorizes this court to enjoin project activities that would prejudice the City's consideration or implementation of mitigation measures or alternatives and that could result in an adverse change to the physical environment, until the City fully complies with CEQA. Bureaucratic and financial momentum behind a project can reduce a public agency's flexibility to change its course of action. (*San Joaquin Raptor*, *supra*, 27 Cal.App.4th at pp. 741-742; see *Laurel Heights I*, 47 Cal.3d at p. 395.) Moreover, when construction is partially completed, an agency is less likely to require a developer to remove or modify the improvements or to change the project design or reduce the density. For these reasons, and to preserve the city's discretion to require project changes or disapprove the project, an immediate stay is appropriate.

DISPOSITION

The judgment is reversed with directions to the superior court to issue a peremptory writ of mandate, consistent with this opinion, directing the City to (1) vacate its approvals of the project and its certification of the EIR; (2) revise the analysis of land use impacts in the EIR; (3) revise the EIR to discuss preservation in place in accordance with Guidelines section 15126.4, subdivisions (a)(1)(B) and (b)(3);

and (4) revise the EIR to identify the intended and likely measures to dispose of the project's wastewater and analyze the environmental impacts of employing those measures to dispose of the wastewater generated by the project, including any cumulative impacts to the Santa Monica Bay.

All construction activities on the project by any person are hereby ordered to be stayed effective immediately. The superior court is directed to issue an order enjoining all project activities that it finds would prejudice the City's consideration or implementation of mitigation measures or alternatives and that could result in an adverse change to the physical environment, until the City fully complies with CEQA. The stay issued herein will expire, without further order by this court, upon entry of such an order by the superior court.

Petitioners and BEEP are entitled to recover their costs on appeal.

NOT TO BE PUBLISHED IN THE OFFICIAL REPORTS

CROSKEY, J.

WE CONCUR:

KLEIN, P. J. ALDRICH, J.

APPENDIX A.ii:
MAY 23, 2008 SUPERIOR COURT ORDER, CONSOLIDATED CASES OF CITY OF SANTA MONICA V. CITY OF LOS ANGELES (BS093502) AND BALLONA ECOSYSTEM EDUCATION PROJECT V. CITY OF LOS ANGELES (BS093507)

Village CEQA

FILED
LOS ANGELES SUPERIOR COURT

MAY 23 2008

JOHN A. CLARKE, CLERK
M Vermilye
BY M. VERMILYE, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

CITY OF SANTA MONICA, BALLONA WETLANDS LAND TRUST; ANTHONY MORALES; SURFRIDER FOUNDATION,

Petitioners,

v.

CITY OF LOS ANGELES, a Municipal Corporation, and DOES I-X

Respondents.

PLAYA CAPITAL COMPANY LLC, and DOES XI-XX,

Real Parties in Interest.

CASE NO. BS093502

[Consolidated with Case No. BS093507]

Assigned For All Purposes: Honorable John A. Torribio, Department G

~~[PROPOSED]~~ JUDGMENT

Hearing:

Date: April 11, 2008
Time: 9:00 a.m.
Place: Department G

This Action, a consolidation of Superior Court cases BS093502 (*City of Santa Monica et al. v. City of Los Angeles*) and BS093507 (*Federation of Hillside and Canyon Associations et al. v. City of Los Angeles et al.*), regularly came before the undersigned Superior Court Judge, Honorable William Highberger, for hearing on the Petition for Writ of Mandate beginning August 1, 2005 and concluding August 5, 2005. City Petitioners were represented by Jan Chatten-Brown and Douglas P. Carstens of Chatten-Brown & Associates, Cara Silver of the Santa Monica City Attorney's office, and Sabrina Venskus. Federation Petitioners were represented by Lawrence Teeter (now deceased) and Brian Acree. Respondents were represented by Mary J. Decker of the Los Angeles City Attorney's office and Real Party in Interest by Robert D. Crockett of Latham & Watkins LLP.

This Court issued a tentative Statement of Decision on November 28, 2005; the Judgment issued on January 10, 2006.

The Court of Appeal affirmed the Judgment in part and reversed in part on September 13, 2007, with directions to the trial court. The Remittitur issued on December 18, 2007.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. The petition for writ of mandate is ~~denied, except~~ GRANTED IN PART. as follows ~~in the next paragraph~~;

2. A peremptory writ of mandate shall issue ordering the City to (1) vacate its approvals of the project and its certification of the environmental impact report ("EIR"); (2) revise the analysis of land use impacts in the EIR; (3) revise the EIR to discuss preservation in place in accordance with CEQA Guidelines section 15126.4, subdivisions (a)(1)(B) and (b)(3); and (4) revise the EIR to identify the intended and likely measures to dispose of the project's wastewater and analyze the environmental impacts of employing those measures to dispose of the wastewater generated by the project, including any cumulative impacts to the Santa Monica Bay.

3. Defendant DOES are dismissed from the action.

3. The Respondents and Real Parties in Interest are enjoined from all project activities that would prejudice the City's consideration or implementation of mitigation measures or alternatives that could result in an adverse change in the physical environment, until the City fully complies with CEQA.

4. Petitioners City of Santa Monica, Ballona Wetlands Land Trust, Anthony Morales, Surfrider Foundation, and Ballona Ecosystem Education Project are awarded costs in the sum of $_____.

5. The Petition is otherwise denied.

Dated: MAY 23 2008

John A. Torribio, Superior Court Judge

ORIGINAL FILED
MAY 23 2008
NORWALK
SUPERIOR COURT

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

CITY OF SANTA MONICA, ET AL vs. **CITY OF LOS ANGELES**	Case Number **BS093502** NOTICE OF ENTRY OF JUDGMENT

To the parties herein and to their attorneys of record, you are hereby notified that:

JUDGMENT in the above-entitled action was entered on: **5-23-08**.

CERTIFICATE OF MAILING

I, JOHN A. CLARKE, Executive Officer/Clerk of the Superior Court of California, County of Los Angeles, and not a party to the within action, hereby certify that on MAY 23, 2008; I served the above Notice of Entry of Judgment and Judgment on Special Verdict in Open Court, on the parties in the within action, by depositing true copies thereof, enclosed in sealed envelopes with postage thereon fully prepaid in the United States Post Office mail box in the County of Los Angeles, California, addressed as follows:

SEE ATTACHMENT

JOHN A. CLARKE, Executive Officer/
Clerk of the Superior Court
By: _____, Deputy
M. Vermilye

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APPENDIX B: LAND USE

APPENDIX B.i:
AREA D SPECIFIC PLAN, AS AMENDED BY ORDINANCE NO. 170,785, EFFECTIVE JANUARY 13, 1996

PLAYA VISTA AREA D

Specific Plan

Ordinance No. 160,523
Effective December 26, 1985

Amended by Ordinance No. 170,785
Effective January 13, 1996

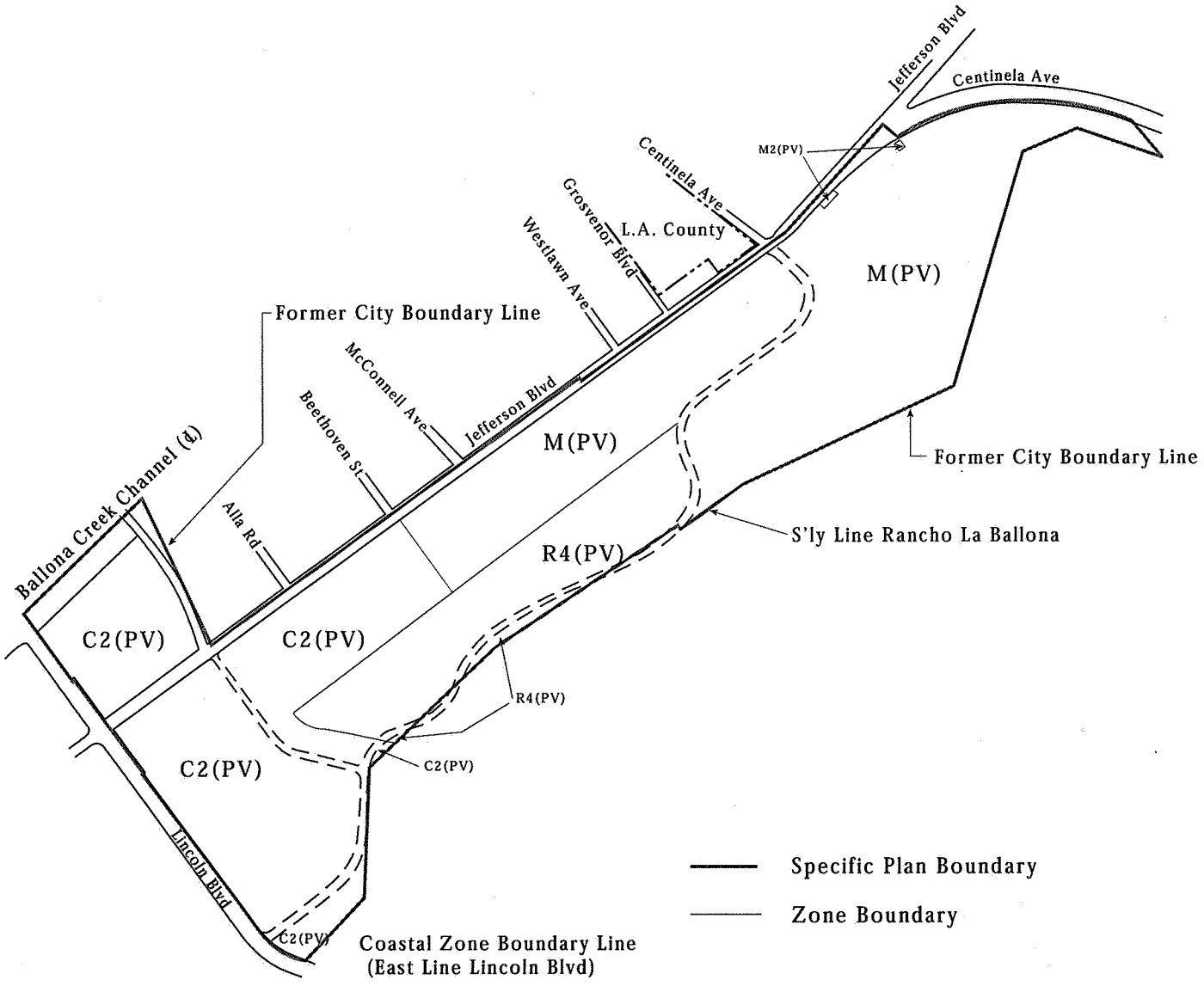
Specific Plan Procedures
Amended pursuant to L.A.M.C. Section 11.5.7

Design Review Board Procedures
Amended pursuant to L.A.M.C. 16.50

TABLE OF CONTENTS

MAP	Specific Plan Area D
Section 1.	Establishment of Specific Plan
Section 2.	Relationship to Other Provisions of Chapter 1 of the Municipal Code of the City of Los Angeles
Section 3.	Definitions
Section 4.	Zone Regulations
Section 5.	Density and Floor Area
Section 6.	Height of Buildings or Structures
Section 7.	Project Permit - Compliance Review
Section 8.	Landscape Standards
Section 9.	Parking
Section 10.	Time Limits
Section 11.	Appeals
Section 12.	Severability
Section 13.	Owner Acknowledgment of Limitations

A Part of the General Plan - City of Los Angeles
http:\cityplanning.lacity.org (General Plan - Specific Plan)



Note:
Location of roadways and land use boundaries is approximate. Precise alignments and boundaries will be determined as part of the Plot Plan review and approval process.

Figure 1
Area D

N
Not to Scale

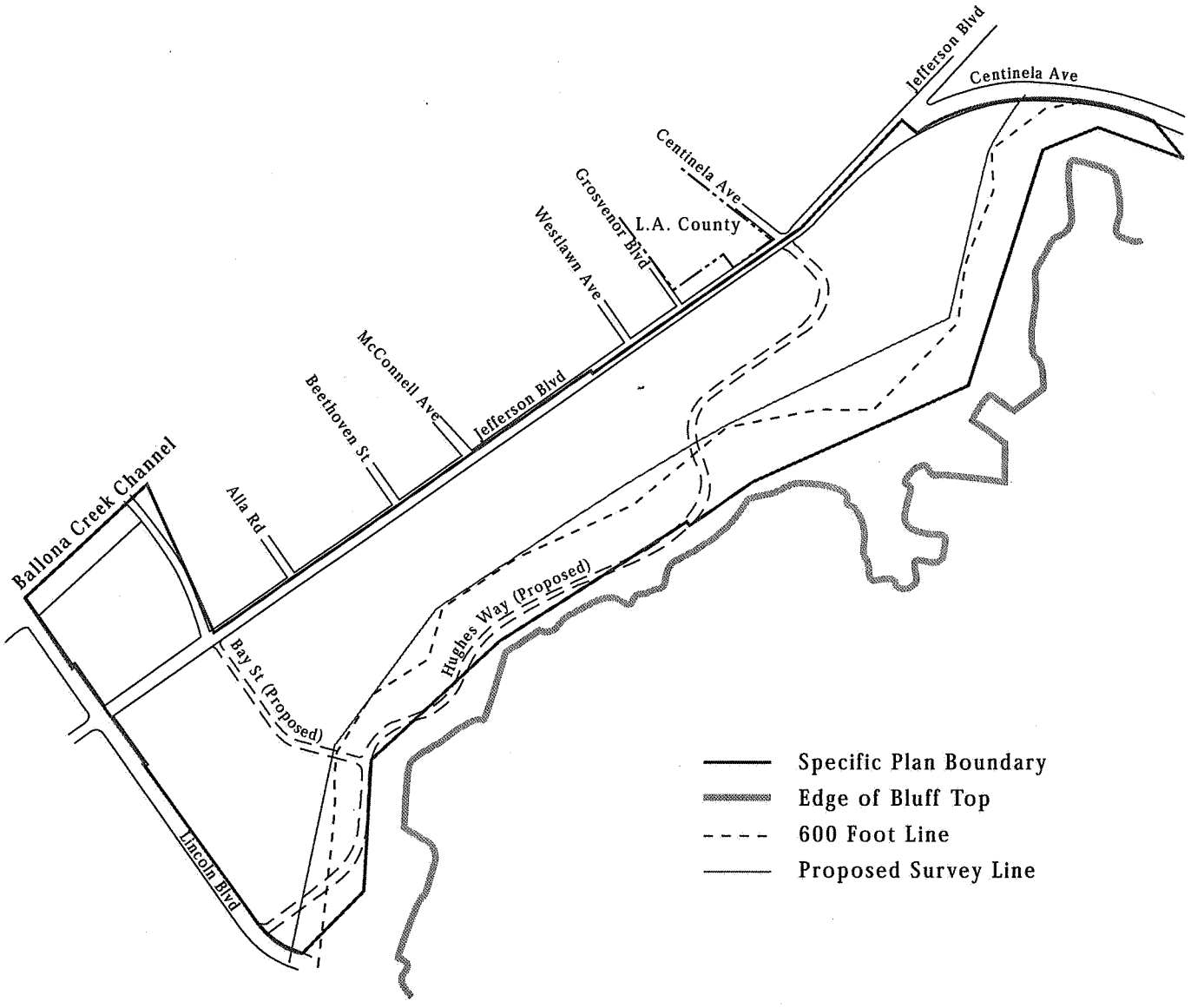


Figure 2
Area D

N
Not to Scale

PLAYA VISTA AREA D SPECIFIC PLAN

WHEREAS, the Westchester-Playa del Rey Community Plan provides for the development of a Specific Plan for Playa Vista Area D for the purpose of designating quantitative and qualitative standards to regulate the uses of land, the density of such uses, building heights, architectural and landscape treatment, signs, and vehicular and pedestrian circulation; and

WHEREAS, the purpose of the Playa Vista Area D Specific Plan is to promote compatible development which provides the Playa Vista area with an image and a sense of community; and

WHEREAS, in order to assure that development proceeds in an orderly fashion and in conformance with the General Plan of the City of Los Angeles, it is necessary to adopt the following Specific Plan;

NOW THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. **ESTABLISHMENT OF SPECIFIC PLAN**

The City Council hereby establishes this Playa Vista Area D Specific Plan applicable to that area of the City of Los Angeles shown within heavy lines on the Map in Figure 1..

This Specific Plan is intended to provide, together with the regulations set forth in Chapter 1 of the Code, regulatory controls and incentives for the systematic execution of that portion of the Community Plan which includes said area and to provide for public needs, convenience and general welfare as the development of such area necessitates. Such regulations limit the density of land use to that which can be accommodated under existing and presently planned public street improvements and transportation programs which impact the area covered by this Specific Plan.

Section 2. **RELATIONSHIP TO OTHER PROVISIONS OF CHAPTER 1 OF THE MUNICIPAL CODE OF THE CITY OF LOS ANGELES**

The regulations of this Specific Plan are in addition to those set forth in the planning and zoning provisions of Chapter 1 of the Code and do not convey any rights not otherwise granted under the provisions contained in said Chapter, except as specifically provided for herein. Wherever this Specific Plan contains provisions different from or in conflict with provisions contained elsewhere in Chapter 1, this Specific Plan shall supersede such other provisions. Procedures for the granting of exceptions to the requirements of this Specific Plan are established in Section 11.5.7 D of the Code.

Section 3. **DEFINITIONS**

Whenever the following terms are used in this ordinance with the first letter or letters capitalized, they shall have the meaning specified below unless the context clearly indicates to the contrary:

Code shall mean the Municipal Code of the City of Los Angeles.

Commercial Billboard shall mean a sign which directs attention to a business, product, or service sold or offered or existing elsewhere than upon the site where such sign is located and which either expressly or implicitly invites a commercial transaction.

Convenience Commercial shall mean a commercial area or uses designed to satisfy the needs of the surrounding residential community.

Floor Area shall mean the total of the gross area of the floor surfaces within the exterior wall of the building, not including space devoted to stairwells, basement storage, required corridors, public restrooms, elevator shafts, light courts, vehicle parking and areas incident thereto, mechanical equipment incidental to the operation of such building, and covered public pedestrian circulation areas, including atriums, lobbies, plazas, patios, decks, arcades and similar areas, except such public circulation areas or portions thereof that are used solely for commercial purposes.

Map shall mean the Map contained in Figure 1 of this ordinance.

Mixed Use Development shall mean any development within the Specific Plan Area which contains in an initial phase or by reason of any subsequent phase of development any combination of the following uses: office, retail, residential, hotel, entertainment, restaurant/lounge, recreation, cultural or other public uses. Such uses may be located in a single building or in separate buildings. Such uses and such separate buildings may also be under single or multiple ownerships.

Plot Plan shall mean a document or documents which pictorially describe, by means or professionally accepted architectural graphic techniques, the location, appearance, configuration and dimensions of any proposed buildings, structures and attendant site improvements including, but not limited to, landscaping and signs, and any public or private easements.

Sign shall mean any display, board, screen, object or part thereof used to announce, declare, demonstrate, display, identify or otherwise advertise and attract the attention of the public, including signs identifying services or products available on the premises or identifying the occupant or premises.

Specific Plan Area shall mean that area shown within the heavy lines on the Map in Figure 1.

Section 4. **ZONE REGULATIONS**

A. General Provisions

Section 12.04 of the Code is hereby amended by adding to the Zoning Map, which is incorporated in and made a part of Article 2 of Chapter 1 of the Code, the zones and zone boundaries shown upon the Map in Figure 1, so that the portion of the Zoning Map covering the Specific Plan Area shall be as designated on the Map. The zone boundaries shown upon the Map are approximate and zone boundary interpretations or adjustments may be made as part of the Plot Plan review and approval process under Section 7 of this ordinance when such zone boundary interpretations or adjustments meet the overall intent of the Specific Plan regarding location of land uses, and/or when necessary to ensure that such zone boundaries precisely coincide with future street, alley or lot lines. Notwithstanding any provision of Article 2 of Chapter 1 of the Code to the contrary, every lot within the Specific Plan Area shall conform to the requirements set forth in this Section 4. Except as provided in Section 7 of this ordinance, no building, structure or land within the Specific Plan Area shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained within the Specific Plan Area without Plot Plan approval as provided in said Section 7 having been first obtained. The Plot Plan approval process set forth in said Section 7 shall be in addition to, and not in lieu of, any subdivision proceeding, including public hearings as required therein, involving the property for which Plot Plan approval is requested.

B. Residential Regulations

1. General Provisions

a. Quimby Dedication Requirements

i) The dedication and restoration of the Ballona Wetlands as defined and set forth in Section 10 of Ordinance No. 165,638 (Playa Vista Area B Specific Plan), together with the park or recreational space required to be provided under Subsection (ii) below, are hereby found to satisfy the requirements of Section 17.12 of the Code for dedication of real property for park and recreational purposes, or for the payment of a fee in lieu thereof, in connection with the construction or development of any and all dwelling units within the Specific Plan Area. Subdivision maps for residential or condominium purposes are hereby authorized to be recorded without any further compliance with Section 17.12 of the Code.

ii) Park or recreation space in an amount equal to 100 square feet per dwelling unit within the Specific Plan Area shall be provided to meet the recreation needs of the future residents. Park or recreation space provided anywhere within the Specific Plan Area shall satisfy

the foregoing requirement for any particular residential development provided that such space will be accessible to the residents of such development. Such space may include common open spaces, central organizing elements or features within the Specific Plan Area, and storm water retention areas which are usable for recreation purposes.

2. **R4(PV) Residential Zone**

Subject to the applicable limitations and provisions of Section 5 of this ordinance, the requirements of the R4 Zone, as modified by the provisions herein, shall apply to all lots zoned R4(PV) within the Specific Plan Area.

a. Use. No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained except for (i) those uses permitted in the R4 Zone including conditional uses enumerated in Section 12.24 of the Code when the location is approved pursuant to the provisions of such Section and (ii) Convenience Commercial uses permitted in the C1 Zone or the accessory uses listed below provided that such uses do not exceed 90,000 square feet of Floor Area (excluding covered tennis, racquetball or squash courts) and that the lot or lots on which such uses are located have access from a major or secondary highway:

1) Athletic, racquet or health club

2) Recreation center

3) Community center, privately operated

4) Swimming pool, commercial

5) Medical offices

6) Other uses or facilities similar to those listed above when determined as provided for in Section 12.21 A 2 of the Code.

b. Yard Requirements. Except as may be permitted by Plot Plan approval pursuant to Section 7 of this ordinance, yard requirements of the R4 Zone shall apply to all uses permitted in the R4 Zone, and yard requirements of the C1 Zone shall apply to permitted Convenience Commercial uses and to the accessory uses listed above.

C. C2(PV) Regional Mixed Use Commercial Zone

Subject to the applicable limitations and provisions of Section 5 of this ordinance, the requirements of the C2 Zone, as modified by the provisions herein, shall apply on all lots zoned C2(PV) within the

Specific Plan Area.

1. **Use.** No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for (i) those uses permitted in the C2 Zone, including conditional uses enumerated in Section 12.24 of the Code when the location is approved pursuant to the provisions of such Section, (ii) those uses permitted in the R5 Zone, and (iii) any combination of uses permitted in the R5 Zone and commercial uses permitted in the C2 Zone. Notwithstanding the foregoing, the following uses shall be prohibited:

   Adult arcade

   Appliance repair (except as strictly a service for new articles sold at retail on the premises)

   Archery range

   Automobile painting (except when incidental to an authorized agency dealing in new automobiles)

   Automobile sales area (except as incidental to an authorized agency dealing in new automobiles and located on same or contiguous lot)

   Auto ride amusement

   Automobile repair garage (except when conducted in conjunction with an authorized agency dealing in new automobiles and on the same premises)

   Automobile storage area(except as incidental to an authorized agency dealing in new automobiles and located on same or contiguous lot)

   Awning store or shop

   Baseball park

   Baseball batting range

   Battery store or shop

   Billiard hall or parlor

   Boats for hire

   Body and fender repairing (except when conducted in conjunction with an authorized agency dealing in new automobiles)

   Boxing arena

Building materials, retail sale of (except when incident to retail hardware store)

Calibration and repair service shops for precision instruments and small metal objects

Carnival, transient

Carousel

Carpenter shop

Church, temporary revival

Circus, transient

Cleaning establishment, self-service

Clothing store, secondhand

Commercial billboard

Compressed natural gas refueling station

Concession, beach

Contractors' establishment (except as strictly an office use)

Diaper supply service

Electric motor repair (except as strictly a service for new articles sold at retail on the premises)

Fairgrounds, public

Feed store

Ferris wheel

Fire sale

Football stadium

Frozen food locker plant

Fuel store

Fun house

Furniture cleaning (except as strictly a service for new articles sold at retail on the premises)

Garden equipment rental

Handyman shop

Horse show

Household appliance repair (except as strictly a service for new articles sold at retail on the premises)

Household goods storage

Hug ball

Ice storage house

Laundry or cleaning establishment, self-service type

Lumber store

Magazine business, secondhand

Merry-go-round

Pawnshop

Pest or insect control business

Plumbing shop

Pony riding ring

Refrigeration equipment installation and service (except as strictly a service for new articles sold at retail on the premises)

Repair shop (except as strictly a service for new articles sold at retail on the premises)

Safe and vault repair and servicing (except as strictly a service for new articles sold at retail on the premises)

Sanitarium

Scenic railway

Secondhand store (other than Antique shops, Art galleries, Book dealers, Postage stamp and Coin stores; see Z.A.I. Case No. 2472)

Sheet metal shop

Shooting gallery

Side show, circus

Special care home

Sports arena

Storage building for household goods

Strip tease show

Tatto studio

Taxi dance hall

Tinsmith shop

Termite or pest control business

Tire shop

Tractor ride amusement

Trailer sales area (except as incidental to an authorized agency dealing in new trailers and located on same or contiguous lot)

Transfer business

Traveling theatrical performances (under canvas)

Used car lot (except as incidental to an authorized agency dealing in new automobiles and located on same or contiguous lot)

Venetian blinds, laundering, servicing and repairing of (except as strictly a service of new articles sold principally at retail)

Window and exhibit booth displays, designing, fabricating and fashioning of

Woodworking equipment rental shop

Wrestling arena

2. **Yard requirements.**

No yards shall be required.

D. M(PV) Industrial Zone

The following requirements shall apply to all lots zoned M(PV) within the Specific Plan Area:

1. **Use.** No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for the following uses:

a. Any use permitted in the MR2 Zone other than Commercial Billboards which shall be prohibited.

b. Any commercial use permitted in the C2 Zone other than Commercial Billboard which shall be prohibited.

c. Any industrial use permitted in the M1 Zone which is not otherwise permitted under Subsection A above.

d. Electric power co-generating facility.

e. Engine testing subject to the same limitations applicable to such use in the M2 Zone.

f. Conditional uses enumerated in Section 12.24 B 1 of the Code when approved pursuant to the provisions of Section 12.24 B of the Code.

g. Other uses similar to the above, as provided in Section 12.21 A 2 of the Code as determined by the Zoning Administrator, but not including uses which are or may become obnoxious or offensive by reason of emission of odor, dust, smoke, noise, gas, fumes, cinders, vibrations, refuse matter or water-carried waste.

h. Uses customarily incident to any of the above uses and accessory buildings when located on the same lot.

i. Airport, aircraft landing field and heliport facilities and operations authorized as of the effective date of this ordinance under Airport Permit No. 19-21 issued by the Department of Transportation for the State of California.

2. **Area Requirements.** Area requirements of the M1 Zone shall apply.

E. P(PV) Parking Zone

The requirements of the P Zone shall apply on all lots zoned P(PV) within the Specific Plan Area.

F. M2(PV) Industrial Zone

The requirements of the M2 Zone shall apply on all lots zoned M2(PV) within the Specific Plan Area, except that Commercial Billboards shall be prohibited.

G. Mixed Use Developments in the C2(PV) Zone

It is the intent of this Specific Plan to implement a "primary center," as described in the City's Centers Definition Report, within the C2(PV) Zone with its focus between Bay Street and Lincoln Boulevard; to encourage Mixed Use Developments within such zone to create an intensive, lively urban environment; to maximize development intensity

in order to take advantage of the accessibility offered by transportation facilities; to encourage innovative design and integration of residential and commercial uses in order to provide alternative housing styles and a mix of retail, entertainment, residential, commercial recreation and cultural uses. Consistent with the complex urban character of the C2(PV) Zone, it is intended that Plot Plan review of Mixed Use Developments emphasize the flexible application of the provisions of this ordinance governing design standards, landscaping, signage, lighting and parking. In order to encourage the provision of Convenience Commercial uses within Mixed Use Developments, the total Floor Area devoted to such uses shall not count toward the densities allowable under Section 5B of this ordinance, provided that such areas are accessible from adjacent sidewalks or publicly accessible walkways, plazas or courts and that the total floor Area of such areas does not exceed 50,000 square feet.

H. Temporary Uses

Temporary or interim uses not specifically permitted by this Specific Plan may be permitted provided a conditional use permit is obtained pursuant to the provisions of Section 12.24 B of the Code. Such conditional use permits for temporary or interim uses will be valid for a term of not longer than 15 years. A Plot Plan covering the temporary or interim use shall be submitted with the conditional use application. In addition to the findings required under Section 12.24 B, the Planning Commission shall make the following findings:

1. The subject parcel on which such temporary or interim use is to be located is not scheduled for ultimate planned development within the temporary use time period;

2. Adjacent scheduled or existing development will not be adversely impacted by the temporary or interim use; and

3. Adequate guarantees for removal and discontinuance of the temporary or interim use have been provided.

   The temporary or interim use must be acknowledged in any leases, deeds or licenses applicable thereto, subject to the provisions thereof, and may be removed or discontinued at any time by the landowner. A Plot Plan covering the temporary or interim use shall be submitted with the conditional use application.

Section 5. DENSITY AND FLOOR AREA

A. Residential Limitations

Notwithstanding the provisions of Section 12.11 C 4 of the Code to the contrary, the total allowable dwelling units within the Specific Plan Area shall not exceed 3,246 dwelling units. Excluded from the foregoing limitation shall be any Low and Moderate Income Dwelling Units, as defined in Ordinance No. 165,638 (Playa Vista B Specific Plan) and Ordinance No. 165,639 (Playa Vista Area C Specific Plan)

which are required to be constructed under said ordinances but which are located within the Specific Plan Area.

B. C2(PV) Zone Limitations

Within the portion of the Specific Plan Area zoned C2(PV) the following limitations on density and total Floor area shall apply:

1. **Retail Commercial**

   The total Floor Area shall not exceed 600,000 square feet (including all square footage devoted to Convenience Commercial uses or accessory uses listed in Section 4B2 of this Ordinance which are located in the R4(PV) Zone, but excluding uses and areas ancillary to hotels such as restaurants, retail shops, ballrooms, meeting rooms and other similar places or assembly).

2. **Hotels**

   The total guest rooms or suites of rooms shall not exceed 600, including all hotel rooms or suites of rooms constructed within the M(PV) Zone.

3. **Residential Units**

   Not withstanding the provisions of Section 12.11 C 4 or Section 12.12 C 4 of the Code to the contrary, the total allowable residential dwelling units within the portion of the Specific Plan Area zoned C2 (PV) together with all dwelling units constructed within the portion of the Specific Plan Area zoned R4(PV), shall not exceed the maximum number of dwelling units allowed under Subsection A of this Section 5.

4. **Office and Other Permitted Uses**

   The total Floor Area for all other uses permitted within the C2(PV) Zone, excluding hotels and uses and areas ancillary to hotels such as restaurants, retail shops, ballroom, meeting rooms or other similar place of assembly, shall not exceed 2,050,000 square feet.

C. M(PV) Zone Limitations

The total Floor Area of all buildings within the M(PV) Zone shall not exceed 2,950,000 square feet (excluding hotels and uses and areas ancillary thereto, such as restaurants, retail shops, ballrooms, meeting rooms and other similar places of assembly.

D. M2(PV) Zone Limitations

The total Floor Area within all buildings located on any lot zoned M2(PV) shall not exceed 0.6 times the lot area of such lot, as defined in Section 12.03 of the Code.

E. Allocation of Development Rights

The cumulative totals of Floor Area utilized within each zoning category described in Section 4 of this ordinance above shall be maintained by the Departments of Planning and Building and Safety. Allocation of development rights to each lot within a subdivision shall be made at the time of subdivision, and prior to the recordation of a Final Map. Deed restrictions or covenants running with the land shall be recorded to limit development in accordance with such allocated development rights and in conformity with Section 5 of this Ordinance. Notwithstanding anything in this Specific Plan to the contrary, the total Floor Area devoted to the following kinds of uses within the Specific Plan shall not count towards the maximum Floor Area allowable under Sections 5A, 5B, 5C or 5D of this Ordinance, provided however that the total Floor Area of such uses shall not exceed 25% of the total Floor Area allowed within the Specific Plan Area:

1. Museums and art galleries
2. Libraries
3. Fire stations
4. U.S. postal facilities
5. City of Los Angeles police facilities
6. Churches and synagogues
7. Community centers
8. Civic center and government offices.
9. Schools, elementary, junior and high, public or private (not including universities)
10. Concert halls and performing arts facilities (not including cinemas)
11. Health care facilities
12. Other public-serving and community uses and facilities similar to those listed above, when determined as provided in Section 12.21 A 2 of the Code.

    A density bonus in an amount equal to the total Floor Area devoted to the above-listed uses, when such uses are operated on a non-profit basis, shall be granted as an addition to the maximum Floor Area otherwise permitted under Section 5B4 of this ordinance.

Section 6. **HEIGHT OF BUILDINGS OR STRUCTURES**

No building shall be erected, enlarged or maintained which exceeds the

height limits hereinafter specified. Notwithstanding such height limits, development within the Specific Plan Area shall be subject to the applicable density and Floor Area limitations set forth in Section 5 of the ordinance.

A. Except as provided in Subsections B and C below, in all portions of the Specific Plan Area no buildings or structures may exceed 140 feet above mean sea level as measured by a licensed surveyor and approved by the Department of Building and Safety.

B. Within the entire Specific Plan Area, buildings or structures on a limited number of lots may exceed the height of the nearest bluff. The total area of all such lots shall not exceed twenty percent (20%) of the total area of the Specific Plan Area. For such lots, no buildings or structures shall exceed two-hundred forty (240) feet above grade.

C. Within the entire Specific Plan Area, buildings or structures on a limited number of lots may exceed two-hundred forty (240) feet above grade. The total area of all such lots shall not exceed ten percent (10%) of the total area of the Specific Plan Area. For such lots, no buildings or structures shall exceed the maximum height allowed under Part 77 of the Code of Federal Regulations. The lots affected by this Subsection B shall be separate and distinct from the lots affected by Subsection A above.

D. Notwithstanding anything in the foregoing exceptions to the contrary, in that portion of the Specific Plan Area located southerly of a line which is 600 feet northerly of the top of the bluff, no buildings or structures, or any part hereof, including rooftop equipment and skylights, may exceed 140 feet above mean sea level as measured by a licensed surveyor and approved by the Department of Building and Safety. The precise location of such line for the purpose of this Specific Plan shall be the line established on the Map in Figure 2 of this ordinance and verified by the City Engineer. Once such line is established, it shall not be subject to change due to future erosion or earth movement.

Section 7. **PROJECT PERMIT - COMPLIANCE REVIEW**

The purpose of this Section is to provide standards and a process for review and approval of project permits for all buildings, structures and attendant site improvements proposed for construction within the Specific Plan Area.

A. Jurisdiction

No building permit shall be issued for any building, structure or other development of property, including any transit facilities, unless a Plot Plan for such building, structure or development has been reviewed and approved by the Director of Planning in accordance with the specific plan procedures of Section 11.5.7 of the L.A.M.C. . The foregoing requirement shall not apply to building permits for single-family residences or for remodeling, rehabilitation or repair work solely within the interior of a building or structure.

B. Procedure

Upon the filing of a Plot Plan, the Director of Planning shall, within 75 days of such filing, approve the Plot Plan if such Plot Plan complies with the following standards:

1. Building Standards

a. All proposed buildings or structures shall conform to all applicable provisions contained within this Specific Plan.

b. All proposed buildings shall be designed so as not to cast shadows on any residential development adjacent to the Specific Plan Area between the hours of 9 a.m. and 3 p.m. at the spring equinox.

c. The design of all proposed buildings or structures shall be applied with equal consideration to all elevations visible from adjacent major public streets, plazas or pedestrian walkways.

d. Colors and types of exterior building materials and the facade of any parking structure shall be designed so that they reasonably complement the exterior of adjoining structures.

e. All proposed buildings or structures shall be designed to minimize adverse effects of reflective glare.

f. Any balconies shall be of usable dimension.

g. The facade or landscaping of any parking structure shall be designed in a manner which substantially screens automobiles contained therein when viewed from adjacent major public streets, plazas or pedestrian walkways.

h. All proposed buildings or structures shall be designed in such a fashion so that all ventilation, heating or air conditioning dust, tubes, equipment, or other related appurtenances are adequately screened when viewed from adjacent major public streets, plazas or pedestrian walkways, unless such appurtenances have been employed as an integral and harmonious component in the design.

2. Landscape, Sign and Buffering Standards

a. All open areas (including any roof of any subterranean parking building or structure) not utilized for buildings, driveways, parking areas, recreational facilities, or walks shall be landscaped.

b. All proposed Signs shall be appropriate given their proposed

location, size and purpose.

c. Residential uses shall be reasonably buffered from commercial or industrial uses where such uses contain sources of noise, odor or other nuisance or hazard not compatible with such residential development.

d. Any proposed yard which is less than would otherwise be required under this ordinance is compatible with adjacent buildings, structures and uses.

e. The proposed development conforms to the standards set forth in Section 8 of this Ordinance.

3. **Transportation and Traffic Standards**

a. Vehicular access to the proposed buildings or structures from divided major or major arterials shall only be from intersecting public roadways or private roadways approved by the Department of Transportation and the City Engineer.

b. Vehicular access from divided major or major arterials to driveways shall be prohibited except as approved by the Department of Transportation and the City Engineer.

c. Collector streets serving the proposed development shall intersect the arterial system within the Specific Plan Area in a manner to facilitate the safe and efficient flow of traffic, as approved by the Department of Transportation and the City Engineer.

d. The proposed development shall comply with the provisions of the Coastal Transportation Corridor Specific Plan in effect as of the date of approval of the Plot Plan by the Director of Planning.

C. Conditions of Approval

In approving a Plot Plan, the Director of Planning may impose reasonable conditions deemed necessary to ensure that the Plot Plan will be in accord with the design standards set forth in Sections 7B, 8 and 9 of this ordinance and may make such zone boundary interpretations or adjustments as may be necessary when such zone boundary interpretations or adjustments meet the overall intent of the Specific Plan regarding location of land uses, and/or to ensure that the affected zone boundaries precisely coincide with street, alley or lot lines.

D. Fees

Fees for filing of any required Plot Plans shall be the same as those for approval of an application required for a landscaping plan, as established in Section 19.01 I of the Code.

E. Advisory Determination

Ad applicant may request a preliminary Plot Plan review for an advisory non-binding determination of compliance with the provisions contained in this Specific Plan, when such applicant determines, with the concurrence of the Director of Planning, that such applicant's project, because of its size or complexity, requires a preliminary determination of compliance before proceeding with more detailed design.

F. Application to Existing Buildings or Structures

Notwithstanding anything herein to the contrary, the requirements of Sections 7, 8 and 9 shall not be applicable to repairs or alterations, including structural alterations, which do not involve an addition to or enlargement of buildings or structures which existed within the Specific Plan Area upon the effective date of this ordinance. No condition may be imposed on a Plot Plan approval for any new building or structure within the Specific Plan Area where such condition would require any such existing building or structure to meet the requirements set forth in Sections 7, 8 or 9 of this ordinance. No condition may be imposed on a Plot Plan approval for any addition to or enlargement of any such existing building or structure where the use thereof conforms to the regulations of the Zone in which it is located and where such condition would require any such existing building or structure to meet the requirements set forth in Sections 7, 8 or 9 of this ordinance.

Section 8. LANDSCAPE STANDARDS

The purpose of this Section is to establish landscape standards that will promote an attractive setting throughout the Specific Plan Area. More specifically, the standards are intended to provide for a neat and well maintained appearance in areas not covered by buildings or parking.

A. General Requirements

The erection of any structure, or the enlargement of any existing structure after the effective date of this ordinance shall conform to the following requirements:

1. A landscape plan prepared by a licensed landscape architect shall be submitted as part of a Plot Plan for review under Section 7 of this ordinance.

2. Landscape plans shall include the approximate size and location of all proposed plant materials, the scientific and common names of such plant materials, the proposed irrigation plan and estimated planting schedule.

3. Surface parking lots shall be screened from view from adjacent major public streets, plazas and pedestrian walkways by the use of berms, landscaping and/or walls or other architectural devices.

4. Minimum landscaped areas of surface parking lots shall be 10 percent.

B. Street Trees

1. Street trees appropriate to the location and approved by the Street Tree Division of the Bureau of Street Maintenance shall be planted at a minimum of one for every 40 lineal feet of street frontage.

2. Street trees shall be in a minimum 15-gallon container and 8 feet in height at the time of planting.

C. Other Landscaped Areas

1. On landscaped portions of individual sites, tree types shall be selected on the basis of attractiveness, hardiness and suitability for the local environment.

2. Ground cover and lawn areas shall be planted and maintained to achieve complete coverage of landscaped areas.

3. Rear and side yards visible from adjacent streets or major public plazas or walkways shall be landscaped with plant materials that complement those used at the front of a building or structure.

4. Wherever such rear or side yard areas provide secondary access to buildings or structures, such entrances shall be landscaped in an attractive manner.

5. No artificial plants shall be permitted.

Section 9. **PARKING**

The purpose of this Section is to provide regulatory standards pertaining to the off-street parking of motor vehicles. Except as provided in this ordinance, the provisions of Section 12.21 A 4 of the Code shall apply to property within the Specific Plan Area.

A. Parking Space Requirements

1. For **dwelling units**, there shall be at least two parking spaces provided for each dwelling unit with two or more bedrooms and one and one-half parking spaces for each studio, efficiency and one-bedroom unit. In addition, there shall be at least one parking space provided for each four dwelling units which shall be reserved for, and accessible to, visitors and guests.

2. For office and other commercial uses, there shall be at least two and one-half parking spaces provided for each 1,000 square feet of Floor Area.

3. For **industrial buildings**, there shall be at least two parking spaces provided for each 1,000 square feet of Floor Area.

4. For **Mixed Use Developments** within the Specific Plan Area, determination of parking requirements shall be made by

determining the required number of parking spaces for each individual use within such Mixed Use Developments that would otherwise be required by Section 9B of this ordinance or, for uses not covered by this ordinance, the Code, and by then applying the formulas listed below. The resulting parking requirements for such Mixed Use Developments shall be the greatest number of parking spaces resulting from the application of each of the formulas for the critical peak-hour periods of 10:00 a.m. 12:00 noon, and 7:00 p.m. Other uses not accounted for in the formulas below may be added at the approval of the Director of Planning.

10:00 a.m. 100% Office + 40% Hotel Guest Room + 20% Hotel Restaurant + 40% Hotel Meeting Room + 50% Retail + 20% Other Restaurant + 10% Theater + 10% Church/Auditorium, etc.

12:00 Noon 92% Office + 30% Hotel Guest Room + 100% Hotel Restaurant + 75% Hotel Meeting Room + 100% Retail + 65% Other Restaurant + 10% Theater + 10% Church/auditorium, etc.

7:00 p.m. 5% Office + 100% Hotel Guest Room + 100% Hotel Restaurant + 100% Hotel Meeting Room + 80% Retail + 100% Other Restaurant + 100% Theater + 20% Church/Auditorium, etc.

B. Alternative Requirements

Notwithstanding anything in the Code or this ordinance to the contrary, parking requirements may be reduced below those specified in Section 9A of this ordinance or the Code, if the Director of Planning finds, in connection with the Director's review and approval of a Plot Plan as provided in Section 7 of this Ordinance, that such reduction is justified based on substantial evidence, including, but not limited to, a parking demand analysis (demonstrating that parking needs for certain uses or combination of uses is less than the number of parking spaces which would otherwise be required for such uses) and/or measures (such as Transportation Demand Management programs) implemented (individually or in conjunction with owners and/or tenants of other projects) or to be implemented by owners and/or tenants of the project covered by such Plot Plan to reduce traffic to and from, and therefore parking at, such project.

Section 10. TIME LIMITS

Any time limit established by this ordinance may be extended by mutual agreement between the applicant and the Director of Planning, the Planning Commission or the City Council, as the case may be.

Section 11. SEVERABILITY

If any provision of this ordinance or the application thereof to any person, property or circumstances, is held invalid, the remainder of this ordinance

or the application of such provisions to other persons, property or circumstances shall not be affected thereby.

Section 12. **OWNER ACKNOWLEDGMENT OF LIMITATIONS**

The Department of Building and Safety shall issue no building permit for construction upon property within the Specific Plan Area until such time as the owner of such property has recorded with the County Recorder and submitted to the Director of Planning and the Department of Building and Safety an acknowledgment and acceptance or the contents and limitations of this ordinance.

APPENDIX B.ii:
PROPOSED AMENDMENTS TO AREA D SPECIFIC PLAN, ORDINANCE NO. _____

ORDINANCE NO. _____

An ordinance amending Ordinance No. 160,523, commonly known as the Playa Vista Area D Specific Plan.

NOW THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES DO ORDAIN AS FOLLOWS:

Section 1. Section 3 of Ordinance No. 160,523 is amended by revising or adding the following definitions in the proper alphabetical order to read:

"Alzheimer's/Dementia Care Housing" shall mean residential housing that is licensed by the California Department of Social Services and provides assistance to people 62 years of age or older who require assistance with two or more non-medical activities of daily living as defined in the Department of Social Services licensing requirements. The residential units may consist either of dwelling units or guest rooms. Full time medical services shall not be provided on the premises. It may be a component of an Assisted Living Facility.

"Assisted Living Care Housing" shall mean a facility licensed by the California Department of Social Services and provides assistance to people 62 years of age or older who require assistance with two or more non-medical activities of daily living as defined in the Department of Social Service licensing requirements. The residential units may consist either of dwelling units or guestrooms. Full time medical services shall not be provided on the premises. It may be a component of an Assisted Living Facility.

"Assisted Living Facilities" shall mean a facility that provides residential units for persons 62 years of age and older and which includes one or more of the following housing types: assisted living care housing; skilled nursing care housing; Alzheimer's/Dementia care housing, and/or include senior independent housing.

"Community Serving Uses" shall mean those uses specified in Section 5 F of this Ordinance.

"Mixed Use Development" shall mean any development within the Specific Plan Area which contains in an initial phase or by reason of any subsequent phase of development any combination of the following uses:

commercial, office, retail, residential, hotel, entertainment, restaurant/lounge, recreation, cultural or other public uses. Such uses may be located in a single building or in separate buildings. Such uses and such separate buildings may also be under single or multiple ownerships.

"Senior Independent Housing" shall mean residential housing that consists of dwelling units for persons 62 years of age and older and may include common dining areas or other community rooms. Full time medical services shall not be provided on the premises. It may be a component of an Assisted Living Facility.

"Skilled Nursing Care Housing" shall mean residential housing that is licensed by the California Department of Health and provides acute, intermediate, or long-term skilled nursing care and consists only of guest rooms for its residents. Full time medical services may be provided on the premises. It may be a component of an Assisted Living Facility.

"Telecommunications Facility" shall mean those wireless facilities which are required for cellular and commercial or non-commercial transmissions and receptions, and may include but not be limited to satellite dishes, monopole and antennae transmitters.

"Transit Related Facility" shall mean stations, bus/shuttle stops, bus/shuttle bays and other facilities, including their right of way, which serve transportation by means other than single-occupancy vehicles. This definition shall include the support, storage, maintenance, staging facilities and ridership amenities which are related to these uses.

Sec. 2. Subparagraph (i) of Paragraph a of Subdivision 1 of Subsection B of Section 4 of Ordinance No. 160,523 is amended to read:

(i) The dedication and restoration of the Ballona Wetlands as defined and set forth in Section 10 of Ordinance No. 165,638 (Playa Vista Area B Specific Plan), or the sale of the Ballona Wetlands to a non-profit or governmental entity for purposes of habitat conservation, open space preservation, recreation or other similar public purpose as determined by the Director of Planning, together with the park or recreational space required to be provided under Subparagraph (ii) below, are hereby found to satisfy the requirements of Sections 17.12, 12.21 G and 12.33 of the Code for dedication of real property for park and recreational purposes, or for the payment of a fee in lieu thereof, in connection with the construction or development of any and all dwelling units within the Specific Plan

Area. Subdivision maps for residential or condominium purposes are hereby authorized to be recorded without any further compliance with Sections 17.12, 12.21 G or 12.33 of the Code.

Sec. 3. Paragraphs a and b of Subdivision 2 of Subsection B of Section 4 of Ordinance No. 160,523 are amended to read:

a. **Use.** No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for (i) those uses permitted in the "R4" Zone including conditional uses enumerated in Section 12.24 of the Code when the location is approved pursuant to the provisions of such Section, (ii) Community Serving uses, and (iii) Convenience Commercial uses permitted in the "C1" Zone or the accessory uses listed below provided that such uses do not exceed 90,000 square feet of Floor Area (excluding covered tennis, racquetball or squash courts):

(1) Athletic, racquet or health club

(2) Recreation center

(3) Community center, privately operated

(4) Swimming pool, commercial

(5) Medical offices

(6) Other uses or facilities similar to those listed above when determined as provided for in Section 12.21 A 2 of the Code.

b. **Yard Requirements.** Except as may be provided in a condition of approval for Vesting Tentative Tract Map ("VTT") 60110, yard requirements of the "R4" Zone shall apply to all uses permitted in the "R4" Zone, and yard requirements of the "C1" Zone shall apply to permitted Convenience Commercial uses and to the accessory uses listed above. Notwithstanding the provisions of Sections 12.11 C or 12.13 C of the Code to the contrary, any uses or structures, as set forth in a condition of approval for VTT 60110, may extend or project into a required yard within this Specific Plan area.

Sec. 4. The first unnumbered paragraph of Subdivision 1 of Subsection C of Section 4 of Ordinance No. 160,523 is amended to read:

1. **Use.** No building, structure or land shall be used and no building or structure shall be erected, structurally altered, enlarged or maintained, except for (i) those uses permitted in the "C2" Zone, including conditional uses enumerated in Section 12.24 of the Code when the location is approved pursuant to the provisions of that section, (ii) those uses permitted in the "R5" Zone, (iii) Telecommunications Facilities, (iv) Assisted Living Facilities, (v) Community Serving uses, (vi) Other uses or facilities similar to those listed above as provided for in Section 12.21 A 2 of the Code, and (vii) any combination of uses permitted in the "R5" Zone and commercial uses permitted in the "C2" Zone. Notwithstanding the foregoing, the following uses shall be prohibited:

Sec. 5. Paragraphs c, d, e, f, g, h and i of Subdivision 1 of Subsection D of Section 4 of Ordinance No. 160,523 are re-lettered in order as Paragraphs e, f, g, h, i, j and k.

Sec. 6. Subdivision 1 of Subsection D of Section 4 of Ordinance No. 160,523 is amended by adding two new paragraphs lettered "c" and "d" to read:

c. Transit Related Facilities

d. Telecommunications Facilities provided they comply with the design and location guidelines, as set forth in the conditions of approval for VTT 49104, 52092 and 60110.

Sec. 7. Subsection A of Section 5 of Ordinance No. 160,523 is amended to read:

A. **Residential Limitations.**

Notwithstanding the provisions of Section 12.11 C 4 of the Code to the contrary, the total allowable dwelling units within the Specific Plan Area shall not exceed 5,846 dwelling units. Excluded from the foregoing limitation shall be any Low and Moderate Income Dwelling Units, as defined in Ordinance No. 165,638 (Playa Vista B Specific Plan) and Ordinance No. 165,639 (Playa Vista Area C Specific Plan) which are required to be constructed under those ordinances but which are located within the Specific Plan Area or any Assisted Living residential units as permitted by Subsection B3 of this section.

Sec. 8. Subdivision 1 of Subsection B or Section 5 of Ordinance No. 160,523 is amended to read:

1. Retail Commercial.

The total Floor Area shall not exceed 185,000 square feet (including all square footage devoted to Convenience Commercial uses).

Sec. 9. Subdivision 2 of Subsection B of Section 5 of Ordinance No. 160,523 is deleted.

Sec. 10. Subdivision 3 of Subsection B of Section 5 of Ordinance No. 160,523 is renumbered as Subdivision 2.

Sec. 11. Subdivision 4 of Subsection B of Section 5 of Ordinance No. 160,523 is renumbered as Subdivision 3 and amended to read:

3. Office and Other Permitted Uses.

The total Floor Area for all other uses permitted within the "C2(PV)" Zone, shall not exceed 625,000 square feet. Except that up to 200 Assisted Living residential units shall be permitted, and the Floor Area for such units shall be determined pursuant to the Land Use Equivalency Matrix. The Floor Area for the 200 Assisted Living residential units may cause the total Floor Area for Office and Other Permitted Uses, combined with Assisted Living residential units, to exceed 625,000 square feet.

Sec. 12. Subsection C of Section 5 of Ordinance No. 160,523 is amended to read:

C. "M(PV)" Zone Limitations.

The total Floor Area of all buildings within the "M(PV)" Zone shall not exceed 2,950,000 square feet.

Sec. 13. Subsection E of Section 5 of Ordinance No. 160,523 is relettered as Subsection F.

Sec. 14. Section 5 of Ordinance No. 160,523 is amended by adding a new Subsection "E" to read:

E. Land Use Equivalency Transfer.

1. Purpose.

Land Use Equivalency Transfers are established to permit shifts of Floor Area between certain land use categories over the life of the Specific Plan by authorizing Floor Area reallocations between certain land use categories, utilizing the conversion factors set forth in the Land Use Equivalency Matrix.

2. Limitations.

The permitted Floor Area for Office uses, as specified in Subsection B3, may be reallocated as provided in Table 1, the Land Use Equivalency Matrix. Subject to the limitations of this Subdivision and Table 1, the permitted Floor Area of Assisted Living and Retail uses shall only be increased if there is a proportional decrease in permitted Floor Area of Office uses, based upon applying the corresponding conversion factor in Table 1. In no event, however, shall any reallocation of Floor Area among Office, Assisted Living and Retail land use categories by application of the Land Use Equivalency Matrix result in more than 125,000 square feet of Office use being transferred to a use with combination of Retail and Assisted Living uses or all Retail or Assisted Living uses.

TABLE 1
Land Use Equivalency Matrix

	Equivalency Ratio to Convert to These Land Use Categories	
	Retail	Assisted Living
From Office Use Category (per 1,000 Square Feet)	454.66 Square Feet	8.3 Units

Sec. 15. The first unnumbered paragraph of Section 6 of Ordinance No. 160,523 is amended to read:

No building or structure shall be erected, enlarged or maintained which exceeds the height limits hereinafter specified. Notwithstanding such height limits,

development within the Specific Plan Area shall be subject to the applicable density and Floor Area limitations set forth in Section 5 of this Ordinance.

Sec. 16. Subsections A and B of Section 6 of Ordinance No. 160,523 are amended to read:

A. **First Phase Tract Maps (VTT 49104 and 52092).** Except as provided in Subdivisions 1 and 2 below, within the first phase tract maps (VTT 49104 and 52092) area, no buildings or structures shall exceed a height of 140 feet above mean sea level as measured by a licensed surveyor and approved by the Department of Building and Safety.

1. Buildings or structures on a limited number of lots may exceed the height of the nearest bluff. The total area of all such lots shall not exceed twenty percent (20%) of the total area of the Specific Plan Area. For such lots, no buildings or structures shall exceed two hundred forty (240) feet above grade.

2. Buildings or structures on a limited number of lots may exceed two hundred forty (240) feet above grade. The total area of all such lots shall not exceed ten percent (10%) of the total area of the Specific Plan Area. For such lots, no buildings or structures shall exceed the maximum height allowed under Part 77 of the Code of Federal Regulations. The lots affected by this subdivision shall be separate and distinct from the lots affected by Subdivision 1 above.

3. Notwithstanding anything in the foregoing exceptions to the contrary, in that portion of the first phase tract maps (VTT 49104 and 52092) area located southerly of a line which is 600 feet northerly of the top of the bluff, no buildings or structures, or any part thereof, including rooftop equipment and skylights, may exceed 140 feet above mean sea level as measured by a licensed surveyor and approved by the Department of Building and Safety. The precise location of such line for the purposes of this Specific Plan shall be the line established on the Map in Figure 2 of Section 1 of this Ordinance and verified by the City Engineer. Once such line is established, it shall not be subject to change due to future erosion of earth movement.

B. **Second Phase Tract Map (VTT 60110).** Within the second phase tract map (VTT 60110) area, no buildings or structures shall exceed a height of 95 feet above mean sea level in Height Zone A and 112 feet above mean sea level in Height Zone B as measured by a licensed surveyor and approved by the Department of Building and Safety. The boundaries of

Height Zones A and B shall be as specified in the "Village at Playa Vista Development Criteria and Guidelines" dated August 20, 2003 which is a condition of approval for VTT 60110. Ornamental architectural features (such as belvederes, cupolas, steeples and spires, flags, ornamental towers, clock and bell towers and weather vanes) may exceed the above height limits provided such elements are no more than 625 sq. ft. in total plan area. These elements shall have no plan dimension greater than 25 feet and shall not exceed 142 feet above mean sea level.

Sec. 17. Subdivision 1 of Subsection A of Section 9 of Ordinance No. 160,523 is amended to read:

1. For rental dwelling units, there shall be at least two covered off-street parking spaces provided for each dwelling unit with four or more habitable rooms and one and one-half parking spaces for each dwelling unit with less than four habitable rooms. In addition, there shall be at least one parking space provided for each four dwelling units which shall be reserved for, and accessible to, visitors and guests.

Sec. 18. Subdivisions 2, 3, and 4 of Subsection A of Section 9 of Ordinance No. 160,523 are renumbered as 3, 4 and 5.

Sec. 19. Subsection A of Section 9 of Ordinance No. 160,523 is amended by adding a new Subdivision 2 to read:

2. For condominium dwelling units, there shall be a minimum of two covered off-street parking spaces per dwelling unit with three or more habitable rooms and 1.5 covered off-street parking spaces for dwelling units with less than three habitable rooms plus ¼ guest parking space per dwelling unit, which shall be readily accessible, conveniently located and specifically reserved for guest parking.

(104414)

Sec. 20. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located in the Main Street lobby to the City Hall; one copy on the bulletin board located at the ground level at the Los Angeles Street entrance to the Los Angeles Police Department; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that the foregoing ordinance was introduced at the meeting of the Council of the City of Los Angeles on _____ and was passed at its meeting of _____.

J. MICHAEL CAREY, City Clerk

By _____
Deputy

Approved _____

_____
Mayor

Approved as to Form and Legality

Rockard J. Delgadillo, City Attorney

By _____
SHARON SIEDORF CARDENAS
Assistant City Attorney

Date _____

File No. CF 04-1656-S1
CPC 2003-5865-ZC-GPA-SP-DA

Pursuant to Charter Section 559, I approve this ordinance on behalf of the City Planning Commission and recommend it be adopted . . . . . .

see attached report.

_____
CON HOWE
Director of Planning

APPENDIX B.iii:
PROPOSED DEVELOPMENT AGREEMENT

RECORDING REQUESTED BY AND
WHEN RECORDED MAIL TO:

William F. Delvac, Esq.
LATHAM & WATKINS
633 West Fifth Street, Suite 4000
Los Angeles, California 90071
(213) 485-1234

DEVELOPMENT AGREEMENT

by and among

THE CITY OF LOS ANGELES

and

PLAYA CAPITAL COMPANY, LLC

_____, 200___

1. DEFINITIONS. 2
1.1_ "Applicable Rules" 2
1.2_ "Community Plan" 2
1.3_ "Developer" 2
1.4_ "Development Agreement Act" 2
1.5_ "Discretionary Action" or "Discretionary Approval" 3
1.6_ "Effective Date" 3
1.7_ "Specific Plan" 3
1.8_ "Parties" 3
1.9_ "Playa Vista First Phase Project" 3
1.10_ "Processing Fees" 3
1.11_ "Project" 4
1.12_ "Project Approvals" 4
1.13_ "Reserved Powers" 4
1.14_ "Village at Playa Vista Property 5

2. RECITALS OF PREMISES, PURPOSE AND INTENT. 5
2.1_ State Enabling Statute. 5
2.2_ City Procedures and Actions. 6
2.2.1 Planning Commission Action. 6
2.2.2 City Council Action. 6
2.3_ Purpose of this Agreement. 7
2.3.1 Developer Objectives. 7
2.3.2 Mutual Objectives. 7
2.4_ Applicability of the Agreement. 8

3. AGREEMENT AND ASSURANCES 8
3.1_ Agreement and Assurance on the Part of Developer. 8
3.1.1 Project Development. 8
3.1.2 Timing of Development. 8
3.1.3 Additional Obligations of Developer as Consideration for this Agreement
1. Affordable Housing 9
2. Parks and Recreation 9
3. Job Training and Local Hiring 9
4. Playa Vista Educational Trust. 9
5. Additional Transportation Improvements in the Del Rey Community 9

6. Mar Vista Neighborhood Traffic Management Plan 10
3.2_ Developer's Obligations 10
3.3_ Agreement and Assurances on the Part of the City. 10
3.3.1 Entitlement to Develop. 10
3.3.2 Consistency with Applicable Rules. 10
3.3.3 Changes in Applicable Rules. 11
3.3.3.a Nonapplication of Changes in Applicable Rules. 11
3.3.3.b Changes in Building and Fire Codes. 11
3.3.3.c Changes Mandated by Federal or State Law. 11
3.3.4 Subsequent Development Review. 12
3.3.5 Effective Development Standards. 12
3.3.6 Interim Use. 12
3.3.7 Moratoria. 13
3.3.8 Infrastructure Financing. 13
3.4_ Water Assessment. 13

4. PERIODIC REVIEW 13
4.1_ Annual Review. 13
4.2_ Pre-Determination Procedure. 13
4.3_ Director's Determination. 14
4.5_ Period to Cure Non-Compliance. 14
4.6_ Failure to Cure Non-Compliance Procedure. 15
4.7_ Termination or Modification of Agreement. 15
4.8_ Reimbursement of Costs. 15

5. DEFAULT PROVISIONS 15
5.1_ Default by Developer. 15
5.1.1 Default. 15
5.1.2 Notice of Default. 16
5.1.3 Failure to Cure Default Procedure. 16
5.1.4 Termination or Modification of Agreement. 16
5.2_ Default by the City. 17
5.2.1 Default and Notice of Default. 17
5.2.2 Notice of Default. 17
5.3_ No Monetary Damages. 17

6. GENERAL PROVISIONS 18
6.1_ Effective Date. 18
6.2_ Term. 18

6.3_ Appeals to City Council. 18
6.4_ Enforced Delay; Extension of Time of Performance. 18
6.5_ Dispute Resolution. 19
6.5.1 Dispute Resolution Proceedings. 19
6.5.2 Arbitration. 19
6.5.3 Arbitration Procedures. 19
6.5.4 Extension of Agreement Term. 20
6.6_ Legal Action. 20
6.7_ Applicable Law. 20
6.8_ Amendments. 20
6.9_ Sale of Certain Lots within Village at Playa Vista Property. 21
6.10_ Assignment. 21
6.10.1 Sale of Lots 21
6.10.2 Sale or Assignment to a Controlled Entity 21
6.10.3 Sale or Assignment to a Non-Controlled Entity 22
6.11_ Covenants. 23
6.12_ Statute of Limitation and Laches. 23
6.13_ Cooperation and Implementation. 23
6.13.1 Processing. 23
6.13.2 Other Governmental Permits. 24
6.13.3 Cooperation in the Event of Legal Challenge. 24
6.14_ Relationship of the Parties. 24
6.15_ Hold Harmless. 25
6.15.1. Insurance. 25
6.16_ Tentative Maps. 26
6.17_ Notices. 26
6.18_ Recordation. 27
6.19_ Constructive Notice and Acceptance. 27
6.20_ Successors and Assignees. 27
6.21_ Severability. 28
6.22_ Time of the Essence. 28
6.24_ No Third Party Beneficiaries. 28
6.25_ Entire Agreement. 28
6.26_ Legal Advice; Neutral Interpretation; Headings, Table of Contents. 29
6.27_ Discretion to Encumber. 29
6.28_ Entitlement to Written Notice of Default. 29
6.29_ Counterparts. 30

EXHIBIT 1 33

DEVELOPMENT AGREEMENT

This Development Agreement ("Agreement") is executed this __ day of _____ 200_ by and among the CITY OF LOS ANGELES, a municipal corporation ("City"), and PLAYA CAPITAL COMPANY, LLC, a Delaware limited liability company ("Playa"), pursuant to California Government Code Section 65864, et seq., and the implementing procedures of the City, with respect to the following:

1. **DEFINITIONS.**

For all purposes of this Agreement, except as otherwise expressly provided or unless the context requires:

1.1_ "Applicable Rules"

means the rules, regulations, ordinances and officially adopted policies of the City in force as of the Effective Date of this Agreement, including but not limited to the City's General Plan and the Playa Vista Area D Specific Plan, as amended by the Project Approvals. Additionally, notwithstanding the language of this Section or any other language in this Agreement, all specifications, standards and policies regarding the design and construction of public works facilities, if any, except for those included in Vesting Tentative Tract No. 60110, shall be those that are in effect at the time the Project plans are being processed for approval and/or under construction. Further, the Applicable Rules shall include the Citywide programs which will be enacted after the Effective Date of this Agreement, for storm water pollution abatement mandated by the Federal Water Pollution Control Act of 1972, and subsequent amendments thereto.

1.2_ "Community Plan"

means the Westchester-Playa del Rey Community Plan of the City's General Plan.

1.3_ "Developer"

means Playa or its successors and assigns that meet the criteria set forth in Section 6.10.

1.4_ "Development Agreement Act"

means Section 65864 et seq., of the California Government Code.

1.5_ "Discretionary Action" or "Discretionary Approval"

means an action which requires the exercise of judgment, deliberation or a decision on the part of the City, including any board, commission or department or any officer or employee thereof, in the process of approving or disapproving a particular activity, as distinguished from an activity which merely requires the City, including any board, commission or department or any officer or employee thereof, to determine whether there has been compliance with statutes, ordinances or regulations.

1.6_ "Effective Date"

is the date on which this Agreement is attested by the City Clerk of the City of Los Angeles after execution by Developer and the Mayor of the City.

1.7_ "Specific Plan"

means the Playa Vista Area D Specific Plan, located within the Community Plan area.

1.8_ "Parties"

means collectively Developer and the City.

1.9_ "Playa Vista First Phase Project"

means the development of 363 acres located within the Westside area of the City, specifically development previously approved by the City within Vesting Tentative Tract Map ("VTTM") 49104 and Tentative Tract Map ("TTM") 52092.

1.10_ "Processing Fees"

means all fees required by the City including, but not limited to, fees for land use applications, project permits, building applications, building permits, grading permits, maps and certificates of occupancy which are necessary to accomplish the intent and purpose of this Agreement. Expressly exempted from Processing Fees are all impact fees, linkage fees, or exactions which may be imposed by the City on development projects pursuant to laws enacted after the Effective Date of this Agreement, except as specifically provided for in this Agreement. The amount of the Processing Fees to be applied in connection with the development of the Project shall be the amount which is in effect on a Citywide basis at the time an application for the City action is made unless an alternative amount is established by the City in a subsequent

agreement. Notwithstanding the language of this Section or any other language in this Agreement, Developer shall not be exempt from the payment of fees, if any, imposed on a Citywide basis as part of the City's program for storm water pollution abatement mandated by the Federal Water Pollution Control Act of 1972 and subsequent amendments thereto, unless a waiver of any such fees is provided by the City in a subsequent agreement.

1.11_ "Project"

means the development of the Village at Playa Vista Property into a mixed use community with a habitat creation and restoration component. As more particularly set forth in the Project Approvals, development would consist of uses permitted by and in accordance with the Playa Vista Area D Specific Plan, including, but not limited to, up to 2,600 dwelling units; 175,000 square feet of office space; 150,000 square feet of retail space; 40,000 square feet of community-serving uses; 11.4 acres of parks; 1.0 acre of on-site bicycle lanes; 6.7 acre Riparian Corridor; and the restoration of a 5-acre portion of the Westchester Bluffs.

1.12_ "Project Approvals"

means the following land use actions requested by Developer from the City of Los Angeles: 1) amendment of the General Plan to amend the Community Plan to revise the land use designations from Light Industrial, High Medium Residential and Regional Mixed Use Commercial to Community Commercial and High Medium Density Residential; 2) a zone change from the M(PV), R4 (PV) and C2 (PV) to C2 (PV) and R4 (PV); 3) amendments to the text of the Playa Vista Area D Specific Plan to adjust the land use entitlements allowed in the Specific Plan; and 4) approval of Tract Map 60110 for the project, including Conditions of Approval and the resubdivision of Lot 113 of VTTM 49104.

1.13_ "Reserved Powers"

means the rights and authority excepted from this Agreement's restrictions on the City's police powers and which are instead reserved to the City. The Reserved Powers include the powers to enact regulations or take future Discretionary Actions after the Effective Date of this Agreement that may be in conflict with the Applicable Rules, but: (1) are necessary to protect the public health and safety, and are generally applicable on a Citywide basis (except in the event of natural disasters as found by the Mayor or City Council such as floods, earthquakes and similar acts of God); (2) are amendments to Chapter IX of the Los Angeles Municipal Code Section 91.0101 et seq. (Building Code) or Chapter V of the Los Angeles Municipal Code Section 57.01.01 et seq. (Fire Code) regarding the construction, engineering and design standards for private and public improvements and which are (a) necessary to the health and safety of the

residents of the City, and (b) are generally applicable on a Citywide basis (except in the event of natural disasters as found by the Mayor or City Council such as floods, earthquakes, and similar acts of God; (3) are necessary to comply with state or federal laws and regulations (whether enacted previous or subsequent to the Effective Date of this Agreement); or (4) constitute Processing Fees and charges imposed or required by the City to cover its actual costs in processing applications, permit requests and approvals of the Project or in monitoring compliance with permits issued or approvals granted for the performance of any conditions imposed on the Project, unless otherwise waived by the City.

1.14_ "Village at Playa Vista Property"

means the site generally bounded by the Playa Vista First Phase Project to the east and west, Jefferson Boulevard to the north, and the Westchester Bluffs to the south, and as more particularly set forth in the legal description attached hereto as Exhibit 7. The property included within the boundaries of the Village at Playa Vista Property may be amended from time to time pursuant to Section 6.9 of this Agreement.

2. RECITALS OF PREMISES, PURPOSE AND INTENT.

2.1_ State Enabling Statute.

To strengthen the public planning process, encourage private participation in comprehensive planning and reduce the economic risk of development, the Legislature of the State of California adopted the Development Agreement Act which authorizes any city to enter into binding development agreements establishing certain development rights in real property with persons having legal or equitable interests in such property. Section 65864 of the Development Agreement Act expressly provides as follows:

> "The Legislature finds and declares that:
>
> (a) the lack of certainty in the approval of development projects can result in a waste of resources, escalate the cost of housing and other development to the consumer, and discourage investment in and a commitment to comprehensive planning which would make maximum efficient utilization of resources at the least economic cost to the public.
>
> (b) Assurance to the applicant for a development project that upon approval of the project, the applicant may proceed with the project in accordance with existing policies, rules and

regulations, and subject to conditions of approval will strengthen the public planning process, encourage private participation in comprehensive planning, and reduce the economic cost of development.

(c) The lack of public facilities, including, but not limited to, streets, sewerage, transportation, drinking water, school, and utility facilities, is a serious impediment to the development of new housing. Whenever possible, applicants and local governments may include provisions in agreements whereby applicants are reimbursed overtime for financing of public facilities."

Notwithstanding the foregoing, to ensure that the City remains responsive and accountable to its residents while pursuing the benefits of development agreements contemplated by the Legislature, the City: (1) accepts restraints on its police powers contained in development agreements only to the extent and for the duration required to achieve the mutual objectives of the Parties; and (2) to offset such restraints, seeks public benefits which go beyond those obtained by traditional City controls and conditions imposed on development project applications.

2.2_ City Procedures and Actions.

2.2.1 Planning Commission Action.

The Planning Commission held a duly noticed public hearing on July 8, 2004 and recommended approval of this Agreement on July 8, 2004.

2.2.2 City Council Action.

The City Council on September 29, 2004, after conducting a duly noticed public hearing, adopted Ordinance No. _____, to become effective on the thirty-first day after publication, approving this Agreement, found that its provisions are consistent with the City's General Plan, the Community Plan, and the Specific Plan, and authorized the execution of this Agreement.

2.3_ Purpose of this Agreement.

2.3.1 Developer Objectives.

In accordance with the legislative findings set forth in the Development Agreement Act, and with full recognition of the City's policy of judicious restraints on its police powers, Developer wishes to obtain reasonable assurances that the Project may be developed in accordance with the Applicable Rules and with the terms of this Agreement and subject to the City's Reserved Powers. To the extent of Project development, and as provided by Section 3.1.1, Developer anticipates making capital expenditures in reliance upon this Agreement. In the absence of this Agreement, Developer would have no assurance that it can complete the Project for the uses and to the density and intensity of development set forth in this Agreement and the Project Approvals. This Agreement, therefore, is necessary to assure Developer that the Project will not be (1) reduced in density, intensity or use from what is set forth in the Project Approvals; (2) subjected to new rules, regulations, ordinances or official policies which are not related to compliance with State or Federal mandates or health and safety conditions; or (3) subjected to delays for reasons other than Citywide health and safety enactments related to critical situations such as, but not limited to, the lack of water availability or sewer or landfill capacity.

2.3.2 Mutual Objectives.

Development of the Project in accordance with this Development Agreement will provide for the orderly development of the Village at Playa Vista Property in accordance with the objectives set forth in the General Plan, the Community Plan and the Specific Plan. Moreover, this Development Agreement will eliminate uncertainty in planning for and securing orderly development of the Project, assure installation of necessary improvements, assure attainment of maximum efficient resource utilization within the City at the least economic cost to its citizens and otherwise achieve the goals and purposes for which the Development Agreement Act was enacted. The Parties believe that such orderly development of the Project will provide many public benefits to the City through the imposition of development standards and requirements under the provisions and conditions of this Agreement, including without limitation: an affordable housing program, parks and recreational facilities in excess of the requirements of environmental mitigation measures or the Subdivision Map Act, a program of job training and local hiring and a five-year continuation of the Playa Vista Educational Trust. Additionally, although development of the Project in accordance with this Development Agreement will restrain the City's land use or other relevant police powers, the Development Agreement will provide the City with sufficient reserved powers during the term hereof to remain responsible and accountable to its residents. In exchange for these and other benefits to the City, Developer will receive assurances that the Project may be developed during the term of this Agreement in accordance with the Applicable Rules and Reserved Powers, subject to the terms and conditions of this Agreement.

2.4_ Applicability of the Agreement.

This Agreement does not: (1) grant density or intensity in excess of that otherwise established in the Applicable Rules; (2) eliminate future Discretionary Actions relating to the Project if applications requiring such Discretionary Action are initiated and submitted by the owner of the Property after the Effective Date of this Agreement; (3) guarantee that Developer will receive any profits from the Project; (4) prohibit the Project's participation in any benefit assessment district that is generally applicable to surrounding properties; or (5) amend the City's General Plan. This Agreement has a fixed term. Furthermore, in any actions after the Effective Date applicable to the Village at Playa Vista Property, the City may apply such new rules, regulations and official policies as are contained in its Reserved Powers.

3. AGREEMENT AND ASSURANCES

3.1_ Agreement and Assurance on the Part of Developer.

In consideration for the City entering into this Agreement, and as an inducement for the City to obligate itself to carry out the covenants and conditions set forth in this Agreement, and in order to effectuate the premises, purposes and intentions set forth in Article 2 of this Agreement, Developer hereby agrees as follows:

3.1.1 Project Development.

Developer agrees that it will use its best efforts, in accordance with its own business judgment and taking into account market conditions and economic considerations, to develop the Project in accordance with the terms and conditions of this Agreement and the Project Approvals.

3.1.2 Timing of Development.

Build out of the Project will occur incrementally, with development expected to begin following resolution of any litigation challenges to the Project and completion of construction of the Project is scheduled to occur within approximately 10 years following commencing construction. Beyond these general parameters, the Parties acknowledge that Developer cannot at this time predict when or the rate at which the Project would be developed. Such decisions depend upon numerous factors that are not all within the control of Developer, such as market orientation and demand, availability of financing and competition. Because the California Supreme Court held in Pardee Construction Co. v. City of Camarillo, 37 Cal.3d 465 (1984), that the failure of the Parties therein to provide for the timing of development permitted a later adopted initiative restricting the timing of development and controlling the Parties'

agreement, it is the intent of Developer and the City to hereby acknowledge and provide for the right of Developer to develop the Project in such order and at such rate and times as Developer deems appropriate within the exercise of its sole and subjective business judgment. The City acknowledges that such a right is consistent with the intent, purpose and understanding of the Parties to this Agreement. Developer will use its best efforts, in accordance with its own business judgment and taking into consideration market conditions, litigation and other economic factors influencing its business decision, to commence or to continue development, and to develop the Project in accordance with the provisions and conditions of this Agreement and with the Applicable Rules.

3.1.3 Additional Obligations of Developer as Consideration for this Agreement.

In addition to the obligations identified in Section 3.1.1, the development assurances provided by this Agreement and the resulting construction of the Project will result in the following:

1. **Affordable Housing.** Developer shall implement the affordable housing program as set forth in Exhibit 1.

2. **Parks and Recreation.** Developer shall provide parks and recreational facilities and improvements in excess of the requirements of environmental mitigation measures or the Subdivision Map Act as set forth in Exhibit 2.

3. **Job Training and Local Hiring.** Developer shall implement a program of job training and local hiring as set forth in Exhibit 3.

4. **Playa Vista Educational Trust.** Developer shall implement the Playa Vista Educational Trust as set forth in Exhibit 4.

5. **Additional Transportation Improvements in the Del Rey Community.** Developer shall implement the additional transportation improvements in the Del Rey Community as set forth in Exhibit 5.

6. **Mar Vista Neighborhood Traffic Management Plan.** Developer shall implement a neighborhood traffic

management plan as set forth in Exhibit 6.

3.2_ Developer's Obligations

Notwithstanding any sale of lots within the Village at Playa Vista Property, Developer shall undertake and perform or cause to be performed the obligations of Developer under Section 3.1 of this Agreement. In the event of any assignment to a controlled entity or to an assignee as set forth in Section 6.10 of less than all of Developer's interest in this Agreement, the Project, the Project Approvals or the Village at Playa Vista Property, Developer may have further obligation under this Agreement as set forth in Section 6.10 to the extent of such assignment.

3.3_ Agreement and Assurances on the Part of the City.

In consideration for Developer entering into this Agreement, and as an inducement for Developer to obligate itself to carry out the covenants and conditions set forth in this Agreement, and in order to effectuate the premises, purposes and intentions set forth in Article 2 of this Agreement, the City hereby agrees as follows:

3.3.1 Entitlement to Develop.

Developer has the right to develop the Project subject to the terms and conditions of this Agreement, the Applicable Rules and the Reserved Powers.

3.3.2 Consistency with Applicable Rules.

Based upon all information made available to the City up to or concurrently with the execution of this Agreement, the City finds and certifies that no Applicable Rules prohibit or prevent the full completion and occupancy of the Project in accordance with the uses, densities, designs, heights, permitted demolition, signage regulations and other development entitlements incorporated and agreed to herein and in the Project Approvals. Without limiting the generality of the foregoing, the City further finds and certifies that upon execution of this Agreement, development of this Project will be exempt from Los Angeles Municipal Code, Chapter 1, Article 6.1, § 16 (the "Site Plan Review Ordinance") because during preparation of the EIR for this Project, the City considered significant aspects of the Project's relation to its site, surrounding property, traffic circulation, sewers and other infrastructures, and its general environmental setting (as required by the Site Plan Review Ordinance.)

3.3.3 Changes in Applicable Rules.

3.3.3.a Nonapplication of Changes in Applicable Rules.

Any change in, or addition to, the Applicable Rules, including, without limitation, any change in any applicable general or specific plan, zoning or building regulation, adopted or becoming effective after the Effective Date of this Agreement, including, without limitation, any such change by means of ordinance, City Charter amendment, initiative, referendum, resolution, motion, policy, order or moratorium, initiated or instituted for any reason whatsoever and adopted by the Mayor, City Council, Planning Commission or any other Board, Commission or Department of the City, or any officer or employee thereof, or by the electorate, as the case may be, which would, absent this Agreement, otherwise be applicable to the Project and which would conflict in any way with the Applicable Rules or this Agreement, shall not be applied to the Project unless such changes represent an exercise of the City's Reserved Powers. Notwithstanding the foregoing, Developer may, in its sole discretion, consent to the application to the Project of any change in the Applicable Rules.

3.3.3.b Changes in Building and Fire Codes.

Notwithstanding any provision of this Agreement to the contrary, development of the Project shall be subject to changes occurring from time to time in the Uniform Building Code and other uniform construction codes. In addition, development of the Project shall be subject to changes occurring from time to time in Chapters V and IX of the Los Angeles Municipal Code regarding the construction, engineering and design standards for both public and private improvements provided that such changes are (1) necessary to the health and safety of the residents of the City, and (2) are generally applicable on a Citywide basis (except in the event of natural disasters as found by the Mayor or City Council such as floods, earthquakes and similar acts of God).

3.3.3.c Changes Mandated by Federal or State Law.

This Agreement shall not preclude the application to the Project of changes in, or additions to, the Applicable Rules, including rules, regulations, ordinances and official policies, to the extent that such changes or additions are mandated to be applied to developments such as

this Project by state or federal regulations. In the event state or federal laws or regulations prevent or preclude compliance with one or more provisions of this Agreement, such provisions shall be modified or suspended as may be necessary to comply with such state or federal laws or regulations.

3.3.4 Subsequent Development Review.

The City shall not require Developer to obtain any approvals or permits for the development of the Project in accordance with this Agreement other than those permits or approvals that are required by the Applicable Rules or the Reserved Powers. However, any subsequent Discretionary Action or Discretionary Approval initiated by Developer that is not otherwise permitted by the Project Approvals, which changes the uses, intensity, density, building height or timing of the Project, or decreases the lot area, setbacks, yards, parking or other entitlements permitted on the Village at Playa Vista Property shall be subject to the rules, regulations, ordinances and official policies of the City then in effect. Any subsequent Discretionary Action or Discretionary Approval initiated by Developer that is permitted by or in furtherance of the Project Approvals shall be subject to the Applicable Rules. Unless amended to provide otherwise, this Agreement shall not apply to any such subsequently approved Discretionary Actions.

3.3.5 Effective Development Standards.

The City agrees that it is bound to permit the uses, intensity of use and density on the Village at Playa Vista Property which are permitted by this Agreement, insofar as this Agreement and the Project Approvals so provide or as otherwise set forth in the Applicable Rules or the Reserved Powers. The City hereby agrees that it will not unreasonably withhold or unreasonably condition any Discretionary Action or Discretionary Approval which must be issued by the City in order for the Project to proceed, provided that Developer reasonably and satisfactorily complies with all preliminary procedures, actions, payments of Processing Fees, and criteria generally required of developers by the City for processing applications for developments and consistent with this Agreement.

3.3.6 Interim Use.

The City agrees that Developer may use the Village at Playa Vista Property during the term of this Agreement for any use which is otherwise permitted by the applicable zoning regulations and the General Plan in effect at the time of the interim use or pursuant to any approvals, permits, or other entitlements previously granted and in effect as of the Effective Date.

3.3.7 Moratoria.

In the event an ordinance, resolution or other measure is enacted, whether by action of the City, by initiative, or otherwise, which relates to the rate, timing, or sequencing of the development or construction on all or any part of the Village at Playa Vista Property, City agrees that such ordinance, resolution or other measure shall not apply to the Village at Playa Vista Property or this Agreement, unless such changes: (1) are found by the City to be necessary to the health and safety of the residents of the City, and (2) are generally applicable on a Citywide basis (except in the event of natural disasters as found by the Mayor or the City Council such as floods, earthquakes and similar acts of God).

3.3.8 Infrastructure Financing.

If Developer undertakes infrastructure financing, the City will cooperate fully by processing any related applications as expeditiously as possible.

3.4_ Water Assessment.

Pursuant to Government Code section 65867.5, Developer and the City agree that any tentative map prepared for the Project shall comply with the provisions of Government Code section 66473.7.

4. PERIODIC REVIEW

4.1_ Annual Review.

During the Term of this Agreement, the City shall review annually Developer's compliance with this Agreement. Such periodic review shall be limited in scope to good faith compliance with the provisions of this Agreement as provided in the Development Agreement Act and Developer shall have the burden of demonstrating such good faith compliance.

4.2_ Pre-Determination Procedure.

Developer's submission of evidence of compliance with this Agreement, in a form which the Director of Planning may reasonably establish, shall be made in writing and transmitted to the Director of Planning not later than sixty (60) days prior to the yearly anniversary of the Effective Date. The public shall be afforded an opportunity to submit written comments regarding compliance to the Director of Planning at least sixty (60) days prior to the yearly anniversary of the Effective Date. All such public comments and final staff reports shall, upon receipt by the City, be made available as soon as possible to Developer.

4.3_ Director's Determination.

On or before the yearly anniversary of the Effective Date of the Agreement, the Director of Planning shall make a determination regarding whether or not Developer has complied in good faith with the provisions and conditions of this Agreement. This determination shall be made in writing with reasonable specificity, and a copy of the determination shall be provided to Developer in the manner prescribed in Section 6.17. Copies of the determination shall also be available to members of the public.

4.4_ Appeal by Developer.

In the event the Director of Planning makes a finding and determination of non-compliance, Developer shall be entitled to appeal that determination to the Planning Commission. After a public hearing on the appeal, the Planning Commission shall make written findings and determinations, on the basis of substantial evidence, whether or not Developer has complied in good faith with the provisions and conditions of this Agreement. Nothing in this Section or this Agreement shall be construed as modifying or abrogating Los Angeles City Charter Section 245 (City Council review of Commission and Board actions).

4.5_ Period to Cure Non-Compliance.

If, as a result of this Annual Review procedure, it is found and determined by the Planning Director or the Planning Commission, on appeal, that Developer has not complied in good faith with the provisions and conditions of this Agreement, the City, after denial of any appeal or, where no appeal is taken, after the expiration of the appeal period described in Section 6.3, shall submit to Developer, by registered or certified mail, return receipt requested, a written notice of default in the manner prescribed in Section 6.17, stating with specificity those obligations of Developer which have not been performed. Upon receipt of the notice of default, Developer shall promptly commence to cure the identified default(s) at the earliest reasonable time after receipt of the notice of default and shall complete the cure of such default(s) not later than sixty (60) days after receipt of the notice of default, or such longer period as is reasonably necessary to remedy such default(s), by mutual consent of the City and Developer, provided that Developer shall continuously and diligently pursue such remedy at all times until such default(s) is cured.

4.6_ Failure to Cure Non-Compliance Procedure.

If the Director of Planning finds and determines that Developer, or its

successors, transferees, and/or assignees, as the case may be, has not cured a default pursuant to this Section, and that the City intends to terminate or modify this Agreement or those transferred or assigned rights and obligations, as the case may be, the Director of Planning shall make a report to the Planning Commission. The Director of Planning shall then set a date for a public hearing before the Planning Commission in accordance with the notice and hearing requirements of Government Code Sections 65867 and 65868. If after such public hearing, the Planning Commission finds and determines, on the basis of substantial evidence, that Developer, or its successors, transferees, a :d/or assignees, as the case may be, has not cured a default pursuant to this Section, and that the City shall terminate or modify this Agreement, or those transferred or assigned rights and obligations, as the case may be, the finding and determination shall be appealable to the City Council in accordance with Section 6.3. In the event of a finding and determination of compliance, there shall be no appeal by any person or entity. Nothing in this Section or this Agreement shall be construed as modifying or abrogating Los Angeles City Charter Section 245 (City Council review of Commission and Board actions).

4.7_ Termination or Modification of Agreement.

The City may terminate or modify this Agreement, or those transferred or assigned rights and obligations, as the case may be, after such final determination of the City Council or, where no appeal is taken, after the expiration of the appeal periods described in Section 6.3. There shall be no modifications of this Agreement unless the City Council acts pursuant to Government Code Sections 65867.5 and 65868, irrespective of whether an appeal is taken as provided in Section 6.3.

4.8_ Reimbursement of Costs.

Developer shall reimburse the City for its actual costs, reasonably and necessarily incurred, to accomplish the required annual review.

5. DEFAULT PROVISIONS

5.1_ Default by Developer.

5.1.1 Default.

In the event Developer does not perform its obligations under the Agreement in a timely manner, the City shall have all rights and remedies provided herein which shall include compelling the specific performance of the obligations of Developer under this Agreement, or modification or termination of this Agreement, provided that the City has first complied with the procedure in Section 5.1.2.

5.1.2 Notice of Default.

The City through the Director of Planning shall submit to Developer, by registered or certified mail, return receipt requested, a written notice of default in the manner prescribed in Section 6.17, identifying with specificity those obligations of Developer which have not been performed. Upon receipt of the notice of default, Developer, shall promptly commence to cure the identified default(s) at the earliest reasonable time after receipt of the notice of default and shall complete the cure of such default(s) not later than sixty (60) days after receipt of the notice of default, or such longer period as is reasonably necessary to remedy such default(s), provided that Developer shall continuously and diligently pursue such remedy at all times until such default(s) is cured. In the event that Developer has assigned all or any portion of its interest pursuant to Section 6.10, Developer shall have the right but not the obligation to cure any defaults of any assignee or successor in interest. Further, any assignee or successor in interest shall the right but not the obligation to cure any default of Developer.

5.1.3 Failure to Cure Default Procedure.

If after the cure period has elapsed, the Director of Planning finds and determines that Developer remains in default and that the City intends to terminate or modify this Agreement, or those transferred or assigned rights and obligations, as the case may be, the Director shall make a report to the Planning Commission and then set a public hearing before the Commission in accordance with the notice and hearing requirements of Government Code Sections 65867 and 65868. If after public hearing, the Planning Commission finds and determines, on the basis of substantial evidence, that Developer has not cured default pursuant to this Section, and that the City shall terminate or modify this Agreement, or those transferred or assigned rights and obligations, as the case may be, Developer shall be entitled to appeal that finding and determination to the City Council in accordance with Section 6.3. In the event of a finding and determination that all defaults are cured, there shall be no appeal by any person or entity. Nothing in this Section or this Agreement shall be construed as modifying or abrogating Los Angeles City Charter Section 245 (City Council review of Commission and Board actions).

5.1.4 Termination or Modification of Agreement.

The City may terminate or modify this Agreement, or those transferred or assigned rights and obligations, as the case may be, after such final determination of the City Council or, where no appeal is taken, after the expiration of the appeal periods described in Section 6.3. There shall be no modifications of this Agreement unless the City Council acts pursuant to Government Code Sections 65867.5 and 65868, irrespective of whether an appeal is taken as provided in Section 6.3.

5.2_ Default by the City.

5.2.1 Default and Notice of Default.

In the event the City does not accept, process, or render a decision on necessary development permits, entitlements, or other land use or building approvals for use as provided in this Agreement upon compliance with the requirements therefor, or as otherwise agreed to by the Parties, or the City otherwise defaults under the provisions of this Agreement, Developer shall have all rights and remedies provided herein or by applicable law, which shall include compelling the specific performance of the City's obligations under this Agreement provided that Developer has first complied with the procedures in Section 5.2.2. No part of this Agreement shall be deemed to abrogate or limit any immunities or defenses the City may otherwise have with respect to claims for monetary damages.

5.2.2 Notice of Default.

Developer shall first submit to the City a written notice of default stating with specificity those obligations that have not been performed. Upon receipt of the notice of default, the City shall promptly commence to cure the identified default(s) at the earliest reasonable time after receipt of the notice of default and shall complete the cure of such default(s) not later than sixty (60) days after receipt of the notice of default, or such longer period as is reasonably necessary to remedy such default(s), provided that the City shall continuously and diligently pursue such remedy at all times until such default(s) is cured. In the case of a dispute as to whether the City has cured the default, the Parties shall submit the matter to arbitration pursuant to Section 6.5 of this Agreement.

5.3_ No Monetary Damages.

It is acknowledged by the Parties that the City would not have entered into this Agreement if it were liable in monetary damages under or with respect to this Agreement or the application thereof. Both Parties agree and recognize that, as a practical matter, it may not be possible to determine an amount of monetary damages which would adequately compensate Developer for its investment of time and financial resources in planning to arrive at the kind, location, intensity of use, and improvements for the Project, nor to calculate the consideration the City would require to enter into this Agreement to justify such exposure. Therefore, the Parties agree that each of the Parties may pursue any remedy at law or equity available for any breach of any provision of this Agreement, except that the Parties shall not be liable in monetary damages and the Parties covenant not to sue for or claim any monetary damages for the breach of any provision of this Agreement.

6. GENERAL PROVISIONS

6.1_ Effective Date.

This Agreement shall be effective upon such date as it is attested by the City Clerk of the City of Los Angeles ("Effective Date") after execution by Developer and the Mayor of the City of Los Angeles.

6.2_ Term.

The term of this Agreement ("Term") shall commence on the Effective Date and shall extend until twenty-five years after the Effective Date, unless said Term is otherwise terminated, modified or extended by circumstances set forth in this Agreement, including, but not limited to, Section 6.4 of this Agreement, or by mutual consent of the Parties hereto. Following the expiration of this Term, this Agreement shall terminate and be of no further force and effect; provided, however, that this termination shall not affect any right or duty arising from entitlements or approvals, including the Project Approvals on the Village at Playa Vista Property approved concurrently with, or subsequent to, the Effective Date of this Agreement. The Term of this Agreement shall automatically be extended for the period of time of any actual delay resulting from any enactments pursuant to the City's Reserved Powers or moratoria.

6.3_ Appeals to City Council.

Where an appeal by Developer to the City Council from a finding and/or determination of the Planning Commission is created by this Agreement, such appeal shall be taken, if at all, within twenty (20) days after the mailing of such finding and/or determination to Developer, or its successors, transferees, and/or assignees, as the case may be. The City Council shall act upon the finding and/or determination of the Planning Commission within eighty (80) days after such mailing, or within such additional period as may be agreed upon by Developer and the Council.

6.4_ Enforced Delay; Extension of Time of Performance.

In addition to specific provisions of this Agreement, whenever a period of time, including a reasonable period of time, is designated within which either party hereto is required to do or complete any act, matter or thing, the time for the doing or completion thereof shall be extended by a period of time equal to the number of days during which such party is prevented from, or is unreasonably interfered with, the doing or completion of such act, matter or thing because of causes beyond the reasonable control of the party to be excused, including: war; insurrection; strikes; walk-outs; riots; floods; earthquakes; fires; casualties; acts of God; litigation

and administrative proceedings against the Project (not including any administrative proceedings contemplated by this Agreement in the normal course of affairs (e.g., the annual review)); any approval required by the City (not including any period of time normally expected for the processing of such approvals in the ordinary course of affairs); restrictions imposed or mandated by other governmental entities; enactment of conflicting state or federal laws or regulations; judicial decisions; the exercise of the City's Reserved Powers; or similar bases for excused performance which is not within the reasonable control of the party to be excused (financial inability excepted). This Section shall be applicable to Section 6.2 of this Agreement. This Section shall not be applicable to any proceedings with respect to bankruptcy or receivership initiated by or on behalf of Developer or, if not dismissed within ninety (90) days, by any third Parties against Developer. If written notice of such delay is given to either party within thirty (30) days of the commencement of such delay, an extension of time for such cause will be granted in writing for the period of the enforced delay, or longer as may be mutually agreed upon.

6.5_ Dispute Resolution.

6.5.1 Dispute Resolution Proceedings.

The Parties may agree to dispute resolution proceedings to fairly and expeditiously resolve disputes or questions of interpretation under this Agreement. These dispute resolution proceedings may include: (a) procedures developed by the City for expeditious interpretation of questions arising under development agreements; (b) non-binding arbitration as provided below; or (c) any other manner of dispute resolution which is agreed upon by the Parties.

6.5.2 Arbitration.

Any dispute between the Parties that is to be resolved by arbitration shall be settled and decided by arbitration conducted by an arbitrator who must be a former judge of the Los Angeles County Superior Court or Appellate justice of the Second District Court of Appeals or the California Supreme Court. This arbitrator shall be selected by mutual agreement of the Parties.

6.5.3 Arbitration Procedures.

Upon appointment of the arbitrator, the matter shall be set for arbitration at a time not less than thirty (30) nor more than ninety (90) days from the effective date of the appointment of the arbitrator. The arbitration shall be conducted under the procedures set forth in Code of Civil Procedure Section 638, et seq., or under such other procedures as are agreeable

to both Parties, except that provisions of the California Code of Civil Procedure pertaining to discovery and the provisions of the California Evidence Code shall be applicable to such proceeding.

6.5.4 Extension of Agreement Term.

The Term of this Agreement as set forth in Section 6.2 shall automatically be extended for the period of time in which the Parties are engaged in dispute resolution to the degree that such extension of the Term is reasonably required because activities which would have been completed prior to the expiration of the Term are delayed beyond the scheduled expiration of the Term as the result of such dispute resolution.

6.6_ Legal Action.

Either party may, in addition to any other rights or remedies, institute legal action to cure, correct, or remedy any default, enforce any covenant or agreement herein, enjoin any threatened or attempted violation, or enforce by specific performance the obligations and rights of the Parties hereto.

6.7_ Applicable Law.

This Agreement shall be construed and enforced in accordance with the laws of the State of California, and the venue for any legal actions brought by any party with respect to this Agreement shall be the County of Los Angeles, State of California for state actions and the Central District of California for any federal actions.

6.8_ Amendments.

This Agreement may be amended from time to time by mutual consent in writing of the Parties to this Agreement in accordance with Government Code Section 65868. Any amendment to this Agreement which relates to the Term, permitted uses, density or intensity of use, height, or size of buildings, provisions for reservation and dedication of land, conditions, restrictions, and requirements relating to subsequent discretionary action, or any conditions or covenants relating to the use of the Village at Playa Vista Property not allowed or provided for under the Applicable Rules or Project Approvals shall require notice and public hearing before the Parties may execute an amendment thereto. Developer shall reimburse the City for its actual costs, reasonably and necessarily incurred, to review any amendments requested by Developer including the cost of any public hearings.

6.9_ Sale of Certain Lots within Village at Playa Vista Property.

It is contemplated that development of the Village at Playa Vista Property will occur over time on a lot by lot basis to third party developers and home builders. It is also contemplated that certain lots within the Village at Playa Vista Property will be sold by Developer over time, either prior or subsequent to development of said lots. Developer may request the Director of the Planning Department to modify the property included within the boundaries of the Village at Playa Vista Property, as that term is used in this Agreement, to exclude certain lots within the Village at Playa Vista Property. The Director of Planning may approve or deny any request in his or her discretion. In making such a determination, the Director of Planning shall consider whether the property that would remain subject to this Development Agreement would be sufficient to allow Developer to carry out its obligations under this Agreement.

6.10_ Assignment.

6.10.1 Sale of Lots

Developer may sell or assign all or any portion of its interests in this Agreement, in the Project, in the Village at Playa Vista Property or in any portion thereof, provided that such sale or assignment conforms with this Section 6.10. The City acknowledges that Developer may sell lots either prior to or subsequent to development without the consent, approval or action of, or notice to, the City. The purchaser of such lots shall be entitled to the rights and benefits of developer under this Agreement provided however, that Developer shall remain responsible for carrying out the obligations of Developer as required by his Agreement as set forth in Section 3.2.

6.10.2 Sale or Assignment to a Controlled Entity

In the event of a sale or assignment of all or any portion of Developer's interest in this Agreement, in the Project, in the Village at Playa Vista Property or in any portion thereof to an assignee in which Developer has a controlling interest, no consent, approval, or action of the City is required. However, except for the sale of lots which is covered by Section 6.9 or Section 6.10.1 above, Developer shall provide written notice to the City at least 30 days prior to any assignment pursuant to this Section 6.10. Provided, however, that if such sale or assignment is a sale or assignment of all of the Developer's interest in this Agreement, in the Project and in the Village at Playa Vista Property, the assignee shall be responsible for all of Developer's burdens obligations, or liabilities and the Developer shall thereafter be relieved of all such burdens, obligations or liabilities. Provided further, if Developer sells or assigns only a portion of its interest, the Developer and the assignee shall be jointly and severally liable for all such burdens, obligations or liabilities, unless the City otherwise consents (such decision to consent or not

consent to be made by the Director of Planning in consultation with the City Attorney).

6.10.3 Sale or Assignment to a Non-Controlled Entity

If such sale or assignment is to an assignee in which Developer does not have a controlling interest, except for the sale of lots which is covered by Section 6.9 or Section 6.10.1 above, Developer must obtain the prior written consent of the City, which consent may be withheld only on the basis of the assignee's character or financial capability as determined in the reasonable discretion of the City as set forth below in this Section 6.10. At least 30 days prior to any assignment to an assignee in which Developer does not have a controlling interest pursuant to this Section 6.10, Developer shall provide to the City: (a) written notice of the assignment, (b) evidence reasonably satisfactory to the City that the assignee satisfies any criteria set forth below in this Section 6.10 and (c) a copy of the assignment document pursuant to which the assignee shall assume the obligations of Developer applicable to the interest assigned, including, without limitation, the obligations of Developer under this Agreement to the extent such obligations are applicable to the interest assigned. The City may reasonably withhold such consent only on the basis of the following factors:

1. Character. The assignee must be a person or entity of good character and reputation.

2. Financial Capability. The assignee must have sufficient verifiable financial resources or commitments to carry out the development and/or operation of the Project in accordance with the terms of this Agreement and the Developer shall have the right to address and rebut. If the assignee (together with its Affiliates) has a verifiable net worth of $10,000,000 (Ten Million) Dollars or more, it shall be deemed to have met this test.

In the event the City consents to such sale or assignment, if such sale or assignment is a sale or assignment of all of the Developer's interest in this Agreement, in the Project and in the Village at Playa Vista Property, the assignee shall be responsible for all of Developer's burdens obligations, or liabilities and the Developer shall thereafter be relieved of all such burdens, obligations or liabilities. Provided further, if Developer sells or assigns only a portion of its interest, the Developer and the assignee shall be jointly and severally liable for all such burdens, obligations or liabilities, unless the City otherwise consents (such decision to consent or not consent to be made by the Director of Planning in consultation with the City Attorney).

Notwithstanding the above, the City may, in its discretion, consent to the sale or assignment of Developer's interests in this Agreement, in the Project, in the Village at Playa Vista Property or in any portion thereof to an assignee that does not satisfy the criteria set forth in this Section 6.10. Unless the City otherwise consents (such decision to consent or not consent to be made by the Director of Planning in consultation with the City Attorney), such an assignment

to an assignee that does not satisfy this Section 6.10 shall be an assignment of Developer's right, title, benefit, privileges and interest in this Agreement, in the Project, in the Village at Playa Vista Property or in any portion thereof and shall not be assignment of Developer's burdens, obligations or liabilities in this Agreement, in the Project, in the Village at Playa Vista Property or in any portion thereof.

6.11_ Covenants.

Except for lots excluded from the Village at Playa Vista Property pursuant to Section 6.9 of this Agreement, the provisions of this Agreement shall constitute, during the Term of this Agreement, covenants which shall run with the land comprising the Village at Playa Vista Property for the benefit thereof, and the burdens and benefits hereof shall bind and inure to the benefit of all assignees, transferees, and successors to the Parties hereto.

6.12_ Statute of Limitation and Laches.

The City and Developer agree that each party will undergo a change in position in detrimental reliance upon this Agreement from the time of its execution and subsequently. The Parties agree that Section 65009(c) of the Government Code, which provides for a 90 day statute of limitation to challenge the enactment or amendment of a zoning ordinance, is applicable to this Agreement, which will provide for development consistent with the zoning ordinance. In addition, any person who may challenge the validity of this Agreement is hereby put on notice that, should the legality or validity of this Agreement be challenged by any third party in litigation which is filed and served more than 90 days after the execution of this Agreement, the City and Developer shall each assert the affirmative defense of laches with respect to such challenge, in addition to all other available defenses.

6.13_ Cooperation and Implementation.

6.13.1 Processing.

Upon satisfactory completion by Developer of all required preliminary actions and payment of appropriate Processing Fees, including the fee for processing this Agreement, the City shall commence and diligently process all required steps necessary for the implementation of this Agreement and development of the Village at Playa Vista Property in accordance with the terms of this Agreement. Developer shall, in a timely manner, provide the City with all documents, plans and other information necessary for the City to carry out its processing obligations.

6.13.2 Other Governmental Permits.

Developer shall apply in a timely manner for such other permits and approvals as may be required from other governmental or quasi-governmental agencies having jurisdiction over the Project as may be required for the development of, or provision of services to, the Project. The City shall cooperate with Developer in its endeavors to obtain such permits and approvals and shall, from time to time at the request of Developer, attempt with due diligence and in good faith to enter into binding agreements with any such entity to ensure the availability of such permits and approvals, or services, provided such agreements are reasonable and not detrimental to the City. These agreements may include, but are not limited to, joint powers agreements under the provisions of the Joint Exercise of Powers Act (Government Code Section 6500, et seq.) or the provisions of other laws to create legally binding, enforceable agreements between such Parties. To the extent allowed by law, Developer shall be a party to any such agreement, or a third party beneficiary thereof, entitled to enforce for its benefit on behalf of the City, or in its own name, the rights of the City or Developer thereunder or the duties and obligations of the Parties thereto. Developer shall reimburse the City for all costs and expenses incurred in connection with seeking and entering into any such agreement provided that Developer has requested it. Developer shall defend the City in any challenge by any person or entity to any such agreement, and shall reimburse the City for any costs and expenses incurred by the City in enforcing any such agreement. Any fees, assessments, or other amounts payable by the City thereunder shall be borne by Developer, except where Developer has notified the City in writing, prior to the City entering into such agreement, that it does not desire for the City to execute such agreement.

6.13.3 Cooperation in the Event of Legal Challenge.

In the event of any legal action instituted by a third party or other governmental entity or official challenging the validity of any provision of this Agreement, the Parties hereby agree to affirmatively cooperate in defending said action.

6.14_ Relationship of the Parties.

It is understood and agreed by the Parties hereto that the contractual relationship created between the Parties hereunder is that Developer is an independent contractor and not an agent of the City. Further, the City and Developer hereby renounce the existence of any form of joint venture or partnership between them and agree that nothing herein or in any document executed in connection herewith shall be construed as making the City and Developer joint venturers or partners.

6.15_ Hold Harmless.

Developer hereby agrees to and shall indemnify, save, hold harmless and defend the City, and its elected and appointed representatives, boards, commissions, officers, agents, and employees (collectively, "the City" in this Section), from any and all claims, costs, and liability for any damages, personal injury or death which may arise, directly or indirectly, from Developer or Developer's contractors, subcontractors, agents, or employees' operations in connection with the construction of the Project, whether such operations be by Developer or any of Developer's contractors, subcontractors, by any one or more persons directly or indirectly employed by, or acting as agent for Developer or any of Developer's contractors or subcontractors. Developer further agrees to and shall indemnify, save, hold the City harmless and, if requested by the City, Developer shall defend the City in any action brought by a third party (1) challenging the validity of this Agreement or (2) seeking damages which may arise directly or indirectly from the negotiation, formation, execution, enforcement or termination of this Agreement. Nothing in this Section shall be construed to mean that Developer shall hold the City harmless and/or defend it from any claims arising from, or alleged to arise from, the negligent acts, negligent failure to act, or willful misconduct on the part of the City. City agrees that it shall fully cooperate with Developer in the defense of any matter in which Developer is defending and/or holding the City harmless. City may make all reasonable decisions with respect to its representation in any legal proceeding.

6.15.1. Insurance.

Without limiting its obligation to hold the City harmless, Developer shall provide and maintain at its own expense, until the completion of construction of the Project, the following program of insurance concerning its operations hereunder. The insurance shall be provided by insurer(s) satisfactory to the City on or before the Effective Date of this Agreement. The program of insurance provided shall specifically identify this Agreement and shall contain express conditions that the City is to be given written notice at least thirty (30) days prior to any cancellation of coverage. Such insurance shall be primary to and not contributing with any other insurance maintained by the City. Such insurance shall name the City as an additional insured, and shall include, but not be limited to, comprehensive general liability insurance endorsed for Premises/Project Site Operations, Products/Completed Operations, Contractual, Broad Form Property Damage, and Personal Injury, with a combined single limit of not less than $2,000,000 per occurrence. From time to time until completion of construction, but not more often than once every two (2) years, Developer shall increase the coverage limits of the insurance required under this Section if so directed by the City after a determination by the City that such an increase is justified using customary and reasonable risk management methods and principles and to the extent such increased limits are available.

6.16_ Tentative Maps.

Pursuant to California Government Code Section 66452.6(a), the duration of tentative maps filed subsequent to the Effective Date shall automatically be extended for the Term of this Agreement.

6.17_ Notices.

Any notice or communication required hereunder between the City or Developer must be in writing, and may be given either personally or by registered or certified mail, return receipt requested. If given by registered or certified mail, the same shall be deemed to have been given and received on the first to occur of (i) actual receipt by any of the addressees designated below as the party to whom notices are to be sent, or (ii) five (5) days after a registered or certified letter containing such notice, properly addressed, with postage prepaid, is deposited in the United States mail. If personally delivered, a notice shall be deemed to have been given when delivered to the party to whom it is addressed. Any party hereto may at any time, by giving ten (10) days' written notice to the other party hereto, designate any other address in substitution of the address, or any additional address, to which such notice or communication shall be given. Such notices or communications shall be given to the Parties at their addresses set forth below:

If to the City:

Director of Planning

City of Los Angeles
221 North Figueroa, 16th Floor
Los Angeles, California 90012

with copies to:

Managing Assistant City Attorney,
City of Los Angeles
Real Property/Environment Division
700 City Hall East, 200 N. Main Street
Los Angeles, California 90012

If to Developer:

Mr. Steve Soboroff
Playa Capital Company, LLC
5510 Lincoln Boulevard, Suite 100
Los Angeles, California 90094

with copies to:

Patricia T. Sinclair, Esq.
Playa Capital Company, LLC
5510 Lincoln Boulevard, Suite 100
Los Angeles, California 90094

and

William F. Delvac, Esq.
Latham & Watkins
633 West Fifth Street, Suite 4000
Los Angeles, California 90071

6.18_ Recordation.

As provided in Government Code Section 65868.5, the City Clerk of Los Angeles shall record a copy of this Agreement with the Registrar-Recorder of the County of Los Angeles within ten (10) days following its execution by both Parties. Developer shall provide the City Clerk with the fees for such recording prior to or at the time of such recording.

6.19_ Constructive Notice and Acceptance.

Every person who now or hereafter owns or acquires any right, title, interest in or to any portion of the Village at Playa Vista Property, is and shall be conclusively deemed to have consented and agreed to every provision contained herein, whether or not any reference to this Agreement is contained in the instrument by which such person acquired an interest in the Village at Playa Vista Property.

6.20_ Successors and Assignees.

The provisions of this Agreement shall be binding upon and shall inure to the benefit of the Parties, any subsequent owner of all or any portion of the Village at Playa Vista Property and their respective successors and assignees, provided, however, that the provisions of this Agreement shall not be binding upon any party or its successors and assigns owning property which is excluded from the definition of Village at Playa Vista Property pursuant to Section 6.9 of this Agreement.

6.21_ Severability.

If any provisions, conditions, or covenants of this Agreement, or the application thereof to any circumstances of either party, shall be held invalid or unenforceable, the remainder of this Agreement or the application of such provision, condition, or covenant to persons or circumstances other than those as to whom or which it is held invalid or unenforceable shall not be affected thereby and shall be valid and enforceable to the fullest extent permitted by law.

6.22_ Time of the Essence.

Time is of the essence for each provision of this Agreement of which time is an element.

6.23_ Waiver.

No waiver of any provision of this Agreement shall be effective unless in writing and signed by a duly authorized representative of the party against whom enforcement of a waiver is sought and refers expressly to this Section. No waiver of any right or remedy with respect to any occurrence or event shall be deemed a waiver of any right or remedy with respect to any other occurrence or event.

6.24_ No Third Party Beneficiaries.

The only Parties to this Agreement are the City and Developer and their successors-in-interest. There are no third party beneficiaries and this Agreement is not intended, and shall not be construed, to benefit or be enforceable by any other person whatsoever.

6.25_ Entire Agreement.

This Agreement sets forth and contains the entire understanding and agreement of the Parties regarding the subject matter hereof and there are no oral or written representations, understandings or ancillary covenants, undertakings or agreements regarding the subject matter hereof which are not contained or expressly referred to herein and no testimony or evidence of any such representations, understandings, or covenants shall be admissible in any proceedings of any kind or nature to interpret or determine the provisions or conditions of this Agreement.

Developer and City, among others, are parties to that certain Stipulation for Entry of Judgment, in *Friends of Ballona Wetlands et al. v. California Coastal Commission, et al.*, Case No. C525,826 filed with the Los Angeles County Superior Court on June 9, 1994, and are negotiating an amendment thereto (as amended from time to time, the "Settlement Agreement"). The parties agree that nothing contained in the Settlement Agreement is intended to limit the rights or benefits to Developer or City under this Agreement nor is anything in this Agreement intend to limit the rights and benefits to Developer or City or the other parties under the Settlement Agreement.

6.26_ Legal Advice; Neutral Interpretation; Headings, Table of Contents.

Each party has received independent legal advice from its attorneys with respect to the advisability of executing this Agreement and the meaning of the provisions hereof. The provisions of this Agreement shall be construed as to their fair meaning, and not for or against any party based upon any attribution to such party as the source of the language in question. The headings and table of contents used in this Agreement are for the convenience of reference only and shall not be used in construing this Agreement.

6.27_ Discretion to Encumber.

This Agreement shall not prevent or limit Developer in any manner, at its sole discretion, from encumbering the Property or any portion of the Property or any improvement on the Property by any mortgage, deed of trust or other security device securing financing with respect to the property or its improvements.

6.28_ Entitlement to Written Notice of Default.

The mortgagee of a mortgage or beneficiary of a deed of trust encumbering the Property, or any part thereof, and their successors and assigns shall, upon written request to the City, be entitled to receive from the City written notification of any default by Developer of the performance of Developer's obligations under this Agreement which has not been cured within sixty (60) days following the date of default. Developer shall reimburse the City for its actual costs, reasonably and necessarily incurred, to prepare this notice of default.

6.29_ Counterparts.

This Agreement may be executed in duplicate originals, each of which is deemed to be an original. This Agreement, not counting the Cover Page and Table of Contents, consists of 52 pages including seven Exhibits, which constitute the entire understanding and agreement of the Parties.

-IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the date first written above.

"City"

CITY OF LOS ANGELES, a municipal corporation of the State of California

By:
James K. Hahn
Mayor

APPROVED AS TO FORM:
ROCKARD J. DELGADILLO, City Attorney

By:
Susan D. Pfann
Assistant City Attorney

DATE: , 200__

ATTEST:
Frank H. Martinez, City Clerk

By:
[name]
Deputy

DATE: , 200__

"Playa"

Playa Capital Company, LLC, a Delaware Limited Liability Company

By:
Name: Steve Soboroff
Title: President

APPROVED AS TO FORM:

By:
William F. Delvac, Esq.
of LATHAM & WATKINS

Counsel for Playa Capital Company, LLC

Playa Capital Company, LLC, a Delaware Limited Liability Company

By:
Name: Douglas Moreland
Title: Senior Vice President, Development

EXHIBIT 1

Village at Playa Vista

Home ownership Opportunities and Affordable Rental Housing

A. OVERVIEW

In connection with entering into the Development Agreement Playa Capital Company, LLC, for itself, and its successors and assigns (the "Developer") hereby establishes an overall program to ensure homeownership opportunity at the Village at Playa Vista and to provide for an appropriate mix and distribution of affordable housing units by building upon the affordable housing in the Playa Vista First Phase project which is currently in the process of ongoing development with affordable housing in the Village of Playa Vista.

The Homeownership Opportunity Program and the Affordable Rental Housing Program are based on the following goals:

Create workforce housing, including both rental housing and homeownership, to promote a jobs/housing balance

Increase opportunities for buyers of moderate means by providing price controls on 10% of all for-sale units in the Village at Playa Vista and the First Phase Project

Take into consideration the efforts of existing housing programs including: organizations established or operated by the City (including the Affordable Housing Trust Fund and Mortgage Credit Certificates), Fannie Mae, and non-profit housing organizations

Serve diverse populations by providing senior housing and workforce housing

Create an appropriate distribution of affordable rental housing within the overall area of the Village at Playa Vista and the First Phase Project.

B. HOMEOWNERSHIP OPPORTUNITY PROGRAM

1. Upon the completion of the Village at Playa Vista Project, 10% of all for-sale units in the Village at Playa Vista shall be controlled price units; provided, however, not less than 125 units shall be for-sale price controlled units.

a. In First Phase Project this was accomplished with the "Controlled Price Units". In the Village this shall be accomplished with the continuation of the "CPU program" as currently underway in the First Phase.

b. Sale of "Controlled Price Units" shall be targeted to assisting targeted "Qualifying Buyers" in coordination with financing programs established by Fannie Mae, the City of Los Angeles and others.

2. Qualifying Buyers. For purposes of the Home ownership Opportunity Program, a "Qualifying Buyer" shall mean any person or family who qualifies for mortgage financing for purchase of a Controlled Price Unit in the Village at Playa Vista.

3. Priority in Village at Playa Vista.

In undertaking the Homeowner Opportunity Program, Developer shall, not less than three (3) months prior to selling Controlled Price Units in the Village at Playa Vista, develop a list of prospective Qualifying Buyers who meet the priority criteria set forth in Section B.3, below.

a. No Controlled Price Unit shall be sold to any buyer whose income exceeds 150% of the minimum income required for a buyer to qualify for purchase of the Controlled Price Unit.

b. In formulating the list of prospective Qualifying Buyers in the Village at Playa Vista, priority shall be given in consideration of the following criteria:

(i) the lowest income Qualifying Buyers at the time a controlled price unit is available for sale who qualify for financing;

(ii) first time home buyers;

(iii) persons whose principal workplace is within five miles of the Village at Playa Vista; and

(iv) community serving employees, such as police officers, fire fighters, teachers, and health care workers.

c. Priority for units with 2 or more bedrooms shall be given to families with children.

4. Targeting and priority shall be subject to any limitations or requirements of law.

5. In marketing for-sale units, Developer shall undertake an outreach effort to make the availability of Controlled Price Units known to teachers, police officers, fire fighters, and health care workers who work within the vicinity of Village at Playa Vista.

6. The Developer shall provide for-sale Controlled Price Units in the Village at Playa Vista in sufficient number so that the total number of all for-sale Controlled Price Units in the Village at Playa Vista shall be not less than 10% of all for-sale units in Village at Playa Vista; provided, however, not less than 125 units shall be for-sale Controlled Price Units. The purchase price for the Village at Playa Vista Controlled Price Units shall not exceed $274,000 (in 2003 dollars) as adjusted on a monthly basis by an amount equal to the Initial Sale CPI Adjustment. The "Initial Sale CPI Adjustment" means $274,000 multiplied by 1.5 times the percentage increase, if any, in the CPI in effect at the end of the first calendar month ending thirty days or more before the date on which the Controlled Price Unit is initially sold over the CPI in effect on December 31, 2003. The maximum price of $274,000 is based on 2003 dollars as increased from the initial maximum price for Controlled Price Units of $195,000 established for the First Phase Project in 1993. CPI means the Consumer Price Index published by the Bureau of Labor Statistics for "All Urban Consumers, Area: US City Average, Items: All Items, Base Period: 1982-1984 = 100, Series ID: CURR0000SA0."

7. The Controlled Price Units shall be compatible with the design or use of market rate units in the project in terms of exterior appearance, materials, and finished quality.

8. A Controlled Price Unit may not be sold for a price in excess of the resale price set forth herein (the "Resale Price"). The Resale Price shall be the lesser of (i) the agreed upon purchase price or (ii) the Adjusted Price. The "Adjusted Price" shall be the Base Price paid by the selling Owner plus an amount equal to the Resale CPI Adjustment, plus the cost of any capital improvements paid by the seller with a useful life of greater than five years with interest thereon at 10% per annum plus any prepayment charges and other charges related to resale incurred on the original note and deed of trust of the selling Owner, plus the seller's normal and customary closing costs incurred in a transaction of this nature in Los Angeles County, including the cost of any required repairs or governmental insurer or lender compliance work, pursuant to an agency inspection or lender appraisal of a Controlled Price Unit, and such additional costs as may actually be required in the sale. The "Resale CPI Adjustment" means the Purchase Price multiplied by 1.5 times the percentage increase, if any, in the CPI in effect at the end of the first calendar month ending thirty days or more before the date on which the Controlled Price Unit is resold over the CPI in effect for the first calendar month ending prior to the date on which the selling Owner acquired such Unit. CPI means the Consumer Price Index published by the Bureau of Labor Statistics for "All Urban Consumers, Area: US City Average, Items: All Items, Base Period: 1982-1984 = 100, Series ID: CURR0000SA0."

9. The Resale Price restriction shall remain in effect for 15 years following the date of the initial sale of a Controlled Price Unit.

10. At least 45 days prior to any sale of a unit that remains subject to the Resale Price restriction, the owner/seller shall provide written notice of the sale to the Housing Department, to the Playa Vista Housing Authority and the Developer. No Controlled Price Unit may be resold without Owner's/Seller's Notice having first been duly given.

11. The Developer shall have a right of first refusal to purchase at the Resale Price any unit that remains subject to the Resale Price restriction. Notice of Developer's intent to exercise its right of first refusal shall be given to the seller within 30 days of receipt of owner's/seller's notice of sale.

12. Subject to the limitations and requirements of law, Developer shall use reasonable efforts to obtain lower community facilities district special taxes for price-controlled units in the Village at Playa Vista when Developer proposes revisions to the Mello-Roos Rate and Method Apportionment for the Village at Playa Vista.

C. AFFORDABLE RENTAL HOUSING PROGRAM

Developer shall provide 83 low-income rental units in the Village at Playa Vista which are restricted to tenants with incomes that do not exceed 80% of the Los Angeles County median household income as determined by the US Department of Housing and Urban Development and adjusted for household size.

In connection with providing such 83 low-income rental units, Developer may choose to eliminate up to 83 existing low income rental units from Fountain Park Apartments located at 13151 Fountain Park Drive, 13163 Fountain Park Drive, 13175 Fountain Park Drive, 5389 Playa Vista Drive, and 5399 Playa Vista Drive, Playa Vista, CA 90094, within the First Phase Project. If Developer chooses to eliminate up to 83 low-income units from Fountain Park Apartments, Developer shall secure all necessary consents, amendments, modifications or waivers required by any bond financing agreements and shall secure any modifications, revisions or waivers of any applicable conditions of approval or mitigation measures of the First Phase Project. Upon request by the Developer, the City shall cooperate with the Developer in the foregoing.

D. DEVELOPMENT OF AFFORDABLE HOUSING

Developer shall ensure that the development of affordable housing units occurs in a time frame that is reasonably contemporaneous with the overall development of housing units permitted as part of the Project. Developer agrees that the City may enforce such development of affordable

housing units by phasing the issuance of certificates of occupancy for market rate units as follows: the City shall not issue a final certificate of occupancy for more than 1250 for sale-market rate units within the Project until at least 125 for-sale price controlled units are constructed. Further, the City shall not issue a final certificate of occupancy for more than 1300 residential units within the Project until 42 low-income rental units within the Project are constructed and shall not issue a final certificate of occupancy for more than 2100 residential units until 41 additional low-income rental units within the Project are constructed (for a total of 83 low-income rental units). To the extent more than 125 for sale price-controlled units are to be constructed pursuant to Section B above, construction of such additional units shall occur in a time frame reasonably contemporaneous with the development of the remaining housing units and shall be completed prior to the issuance of the final certificate of occupancy for the final residential unit within the Project.

EXHIBIT 2

PARKS AND RECREATION PROGRAM

Developer is providing the following park space and improvements: 1) 2 acres of land per thousand projected residents for park and recreational facilities in the Village at Playa Vista Project; 2) constructing and maintaining improvements in those parks within the Village at Playa Vista; and 3) providing 1 acre of land per thousand residents of "off-site" park space in nearby areas, including but not necessarily limited to the First Phase Project. As additional consideration and as a public benefit, Developer shall fund, construct and maintain, or cause to be funded, constructed and maintained, improvements for such off-site parks.

The soft costs and hard costs of off-site park improvements shall not be less than an average cost of $20 per square foot in 2004 dollars annually adjusted by CPI (as defined in Exhibit 1) for the 5.76 acres of off-site parks. Thus, the total value of off-site park improvements shall be $5,018,112.

Prior to the completion of the third subphase, Developer shall cause to be constructed community serving uses which consist of the following:

- Junior Olympic pool
- Children's pool
- Spa
- Fitness Center
- Meeting Room Facilities

These facilities will not be located within the parks. Upon completion, the facilities shall be conveyed to the homeowners association.

In addition, prior to issuance of the first building permit, Developer shall contribute $50,000 to a bicycle/pedestrian enhancement trust fund to be administered by the Los Angeles Department of Transportation. These funds shall be used to study the feasibility of bicycle and pedestrian improvements on Lincoln Boulevard over the Ballona Channel, including bicycle lanes, improved pedestrian access and bicycle and pedestrian safety.

EXHIBIT 3

JOB TRAINING AND LOCAL HIRING PROGRAM

Community Employee Recruitment and Outreach Program

Developer shall employ, or cause project contractors to employ, at-risk youth and adults in up to 10 percent of jobs in connection with construction of buildings at the Village at Playa Vista.

Job Referral
Developer and project contractors shall utilize local job-placement programs and other community-based organizations to bring qualified "at-risk" individuals into the workplace.

Job Training
Developer and project contractors shall utilize local job-skills training programs and other community-based organizations to bring qualified "at-risk" individuals into the workplace, and to train such individuals

"At-risk" individuals have one or more of the following conditions at the time of their application for a job:

- Did not complete high school
- Have a history of substance abuse
- Household income below 50% of the median
- Homeless
- Welfare recipient
- History of involvement with the justice system
- Unemployed
- Single Parent

EXHIBIT 4

PLAYA VISTA EDUCATIONAL TRUST PROGRAM

During the First Phase Project, Developer has funded the Playa Vista Educational Trust ("PVET") which provided the programs set forth below as of March 2004. In connection with the development of the Village at Playa Vista, Developer shall continue to provide educational assistance through the PVET. For the obligations hereunder as part of the Village at Playa Vista project, the PVET shall be known as Village PVET. Developer shall sponsor the Village PVET until 2010 at a level comparable to Developer's sponsorship of PVET in 2003. The total monetary value of Developer's annual contribution to all Village PVET programs shall not be less than $150,000 per year in 2004 dollars annually adjusted by CPI as defined in Exhibit 1.

The programs described below are examples of how Village PVET funds could be utilized. The Village PVET may modify its program offerings to reflect the changing needs of its sponsored schools and changing availability of partnership programs.

If Village PVET ceases to exist, Developer will provide and fund the Village PVET programs through December 31, 2010.

School/Youth Programs

Each year the Village PVET shall select up to fifteen schools in the reasonable proximity to the Village at Playa Vista to sponsor and shall offer those schools a selection of programs.

Under the Village PVET, each sponsored school shall be able to choose from a menu of options that changes each year.

Option 1: Village PVET shall offer a tailored program for each school based on their needs. The following are examples of the types of programs which have been offered in connection with PVET and which are illustrative of the types of program which may be offered as part of the Village PVET:

1. **"Playa Vista Presents" Artist-in-Residence Program**

This program is the result of a partnership between Playa Vista and the Music Center Education Division to help our partner schools sustain and expand quality arts education programs. "Playa Vista Presents" provides a range of opportunities including:

- A 12-week artist-in-residence program for a designated grade level through which expert teaching artists will work in the classrooms with students and teachers to provide hands-on learning activities in the arts.

- Special opportunities for students to perform on stage at Concert Park in the Playa Vista community including funds for school bus transportation.
- Five schools will be selected for the "Playa Vista Presents" Program.

2. "Playa Vista Presents" School Assembly Program

This program, also the result of the partnership between Playa Vista and the Music Center Education Division School, offers the partner schools the opportunity to have assembly performances by acclaimed Music Center artists in music, dance, or theater.

3. School Site Improvement Program

Playa Vista Education Trust will make a substantial physical improvement (i.e., painting and planting) to a school site. PVET will provide the materials and staff to do the work. One school will be selected for this program.

4. Freshwater Marsh Curriculum and Field Trips

Each of the 15 schools will have access to a docent-led field trip to the Freshwater Marsh at Playa Vista. Transportation for two classrooms will be provided by Playa Vista. The company will also provide a wetlands-based curriculum, developed by Friends of Ballona Wetlands, to participating schools.

5. Anne and Kirk Douglas Playground Grant

The Anne and Kirk Douglas Playground Award provides matching grant funding to schools that present a plan to improve and enhance their outdoor and recreational spaces. Over 105 projects have been funded to date, providing over $2 million to LAUSD schools. All LAUSD school sites may apply for matching grants of up to $25,000 per school for playground renovation, greening projects, outside classrooms, as well as other creative projects. Playa Vista will assist and provide support to schools that wish to become part of LAUSD's Anne and Kirk Douglas Playground grant program. One school will be selected for this program.

6. Library Programs

Playa Vista will sponsor a library card registration drive for every student and family member in each of the 15 schools. As an extension of the "Playa Vista Presents" program (referenced above), Playa Vista will sponsor after school storytelling at the new Playa Vista public library.

Option 2: An annual grant of $3,000 to be used for a campus-wide project.

In addition to choosing from either Option 1 or Option 2, Developer shall provide to each sponsored school a scholarship fund in a savings bond with a maturity amount of $2000. The

sponsored school may determine how to disburse funds (e.g. all to one student or to be shared among a number of students).

EXHIBIT 5
ADDITIONAL TRANSPORTATION IMPROVEMENTS IN DEL REY COMMUNITY

Developer shall fund the installation of new traffic signal poles and mast arms to accommodate left-turn signal phasing in each direction at the intersections of Centinela Avenue/Culver Boulevard and Inglewood Avenue/Culver Boulevard. These improvements should be implemented concurrent with the implementation of the proposed project's roadway improvements to these intersections. If found to be warranted by LADOT prior to the installation of roadway improvements to the above-referenced intersections, Developer shall also fund new traffic signal heads with left turn signals and related signal phasing equipment at these intersections.

Concurrent with the implementation of the proposed project's roadway improvements at the intersection of Centinela Avenue/Washington Place, Developer shall apply for approval from the City of Culver City to install a new traffic signal pole and mast arm to accommodate left-turn signal phasing in each direction. Further if such approval is obtained and if found to be warranted by the Culver City Department of Transportation prior to the installation of the traffic signal pole and mast arm, Developer shall also fund new traffic signal heads with left turn signals and related signal phasing equipment at this intersection. Developer shall use its commercially reasonable efforts to obtain such approval. However, the approval is within the jurisdiction and decision-making authority of the city of Culver City and failure to secure such approval shall not be a breach of this Agreement.

EXHIBIT 6
MAR VISTA NEIGHBORHOOD TRAFFIC MANAGEMENT PLAN.

Within one year of the effective date of this Agreement, Developer shall deposit $150,000 into a account to be managed by the City Department of Transportation for implementation of Neighborhood Traffic Management Measures in the Mar Vista area. Implementation of the Neighborhood Traffic Management Measures shall follow the procedures established in LADOT's August 11, 2003 Initial Traffic Assessment, as amended on March 25, 2004 and July 7, 2004, for the Proposed Village at Playa Vista Project.

EXHIBIT 7
LEGAL DESCRIPTION OF THE VILLAGE AT PLAYA VISTA PROPERTY

LEGAL DESCRIPTION

TRACT NO. 060110

That portion of the Rancho La Ballona, in the City of Los Angeles, County of Los Angeles, State of California as shown on map recorded in Book 3, Pages 204 et seq., of Miscellaneous Records, Records of said County, and a portion of the Rancho Sausal Redondo, in said City, per Book 1, Pages 507 and 508 of Patents, Records of said County, described as follows:

Beginning at most northeasterly corner of Tract No. 49104-02, in said City, as per map filed in Book 1270, pages 24 through 29, inclusive, of Maps, Records of said County and being on the southeasterly line of Jefferson Boulevard, 100 feet wide; thence along said southeasterly line of Jefferson Boulevard, North 62°48'54" East 1467.90 feet; thence continuing along said southeasterly line, North 62°21'36" East 929.98 feet; thence North 27°38'24" West 5.00 feet to a line parallel with and 45.00 feet southeasterly of the centerline of said Jefferson Boulevard; thence along said southeasterly line of Jefferson Boulevard, North 62°21'36" East 851.11 feet to the most northwesterly corner of Jefferson Boulevard as dedicated on Tract No. 49104-04, in said City, as per map filed in Book 1236, pages 41 through 55, inclusive, of said Maps; thence continuing along said Jefferson Boulevard and the southwesterly line of Campus Center Drive, 132.00 feet wide, the following eight courses:

1) South 27°38'24" East 5.00 feet;

2) North 63°27'04" East 540.55 feet to the beginning of a curve, concave southerly and having a radius of 160.00 feet;

3) easterly 44.00 feet along said curve, through a central angle of 15°45'23" to the beginning of a reverse curve, having a radius of 160.00 feet;

4) easterly 47.05 feet along said curve, through a central angle of 16°50'51";

5) North 62°21'36" East 255.53 feet to the beginning of a curve concave southerly and having a radius of 25.00 feet;

6) easterly 33.46 feet along said curve, through a central angle of 76°40'43" to the beginning of a non-tangent curve, concave southwesterly, having a radius of 1414.00 feet and to which beginning a radial line bears North 49°02'19" East;

7) southeasterly 326.46 feet along said curve through a central angle of 13°13'41";

8) South 27°44'00" East 211.23 feet to the beginning of a curve, concave northwesterly, having a radius of 20.00 feet and being tangent at its southwesterly terminus to a line parallel with and 94.00 feet northwesterly of the northwesterly line of Lot 1 of Tract No. 52092, in said City, as per map filed in Book 1236, pages 56 through 63, inclusive, of said Maps;

thence southerly 31.45 feet along said curve, through a central angle of 90°05'36" to said parallel line; thence along parallel line South 62°21'36" West 1626.80 feet to a line parallel with and 80.00 feet southwesterly of the southwesterly line of Lot 2 of said Tract No. 52092; thence along said parallel line, South 27°38'24" East 670.54 feet to the beginning of a curve concave northwesterly and having a radius of 20.00 feet; thence southerly 35.09 feet, through a central angle of 100°31'09"; thence South 72°52'45" West 16.60 feet to the southwesterly line of Bluff Creek Drive as shown on said Tract No.

52092; thence along said southwesterly line, South 17°12'35" East 90.00 feet; thence South 17°12'35" East 217.03 feet to the southeasterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, as recorded in Book 3032, Page 170, Official Records of said County; thence along said southeasterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, the following five courses:

1) South 49°43'10" West 208.77 feet to the beginning of a curve concave northwesterly and having a radius of 515.00 feet;
2) southwesterly 156.69 feet along said curve, through a central angle of 17°25'55";
3) South 67°09'05" West 231.04 feet to the beginning of a curve concave southeasterly and having a radius of 185.00 feet;
4) southerly 70.08 feet along said curve, through a central angle of 21°42'11";
5) South 45°26'54" West 48.68 feet to the westerly line of Section 25, township 2 South, Range 15 West, SBM;

thence along said westerly line of Section 25, North 00°05'41" West 42.03 feet to the northwesterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, as recorded in Book 3080, Page 289, of said Official Records; thence along said northwesterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, the following eleven courses:

1) South 45°26'54" West 195.67 feet to the beginning of a curve, concave northwesterly and having a radius of 185.00 feet;
2) southwesterly 176.85 feet along said curve, through a central angle of 54°46'23";
3) North 79°46'43" West 124.32 feet to the beginning of a curve, concave southerly and having a radius of 215.00 feet;

4) westerly 72.03 feet along said curve, through a central angle of 19°11'42";

5) South 81°01'35" West 217.64 feet to the beginning of a curve, concave southeasterly, and having a radius of 215.00 feet;

6) southwesterly 103.76 feet along said curve, through a central angle of 27° 9'04";

7) South 53°22'31" West 46.68 feet to the beginning of a curve concave northwesterly and having a radius of 285.00 feet;

8) southwesterly 67.96 feet along said curve, through a central angle of 13°39'45";

9) South 67°02'16" West 173.26 feet to the beginning of a curve, concave northwesterly and having a radius of 185.00 feet;

10) westerly 79.41 feet along said curve, through a central angle of 24°35'40";

11) North 88°22'04" West 5.37 feet to the beginning of a curve concave southerly and having a radius of 215.00 feet; thence westerly 35.11 feet along said curve, through a central angle of 09°21'20" to the southerly line of said Rancho La Ballona;

thence along said southerly line of the Rancho La Ballona, South 64°58'59" West 158.00 feet to said northwesterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles; thence along said northwesterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, South 58°09'48" West 60.91 feet to the beginning of a curve concave northwesterly and having a radius of 285.00 feet; thence continuing along said northwesterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, southwesterly 76.39 feet along said curve, through a central angle of 15°21'26"; thence continuing along said northwesterly right of way of the 30.00 feet wide sewer easement to the City of Los Angeles, South 73°31'14" West 41.03 feet to

said to the southerly line of the Rancho La Ballona; thence along said southerly line of the Rancho La Ballona, South 64°58'59" West 76.33 feet; thence continuing along said southerly line of the Rancho La Ballona, South 54°23'54" West 36.85 feet to the northeasterly corner of Parcel C of Parcel Map No. 5409, per map filed in Book 171, Pages 71 through 76, inclusive, of Parcel Maps, Records of said County; thence along the easterly line of said Parcel C, South 00°07'20" East 23.73 feet to the southeasterly right of way of said 30.00 feet wide sewer easement to the City of Los Angeles, as recorded in Book 3080, Page 289, and the beginning of a non-tangent curve, concave southeasterly, having a radius of 185.00 feet, and to which beginning a radial line bears North 40°36'44" West ; thence along said southeasterly right of way of said 30.00 feet wide sewer easement to the City of Los Angeles, southwesterly 59.77 feet along said curve, through a central angle of 18°30'40" to the most easterly corner of Lot 26 of Tract No. 49104-06, in said City, as per map filed in Book 1273, pages 86 through 94, inclusive, of said Maps; thence along the northeasterly line of said Lot 26, North 30°56'34" West 185.30 feet; thence along the northeasterly terminus of Bluff Creek Drive as shown on said Tract No. 49104-06, North 32°45'43" West 90.00 feet to the non-tangent curved northwesterly right of way of said Bluff Creek Drive, 90.00 feet wide, said curve being concave southeasterly, having a radius of 9246.00 feet and to which beginning a radial line bears North 32°45'43" West; thence southwesterly 73.94 feet along said curve, through a central angle of 00°27'30" to the northeasterly line of Lot 24 of said Tract No. 49104-06; thence along said northeasterly line of Lot 24, North 27°38'24" West 147.41 feet to the southeasterly line of Discovery Creek, 60 feet wide, as shown on said Tract No. 49104-02; thence northeasterly along said southeasterly line, North 62°21'36" East

60.00 feet to the northeasterly line of Dawn Creek, 60 feet wide, as shown on said Tract No. 49104-02; thence northwesterly along said northeasterly line, North 27°38'24" West 557.00 feet to the beginning of a curve concave southeasterly and having a radius of 15.00 feet and being tangent at its northeasterly terminus to the southeasterly line of Runway Road as shown on said Tract No. 49104-04; thence northeasterly 23.56 feet along said curve, through a central angle of 90°00'00" to said southeasterly line of Runway Road; thence North 27°38'24" West 80.00 feet to the northwesterly line of said Runway Road and the beginning of a non-tangent curve concave northerly, having a radius of 15.00 feet, tangent at its northwesterly terminus to said northeasterly line of Dawn Creek and to which beginning a radial line bears South 27°38'24" East; thence northwesterly 23.56 feet along said curve, through a central angle of 90°00'00" to said northeasterly line of Dawn Creek; thence along said northeasterly line of Dawn Creek, North 27°38'24" West 360.65 feet to the point of beginning.

This Legal Description is shown on the accompanying "LEGAL DESCRIPTION MAP, TRACT NO. 060110" Exhibit and is made a part hereof for reference purposes and is not intended for the use in the division and/or conveyance of land in violation of the Subdivision Map Act of the State of California.

John Chiappe Jr., PLS 7230

PSOMAS

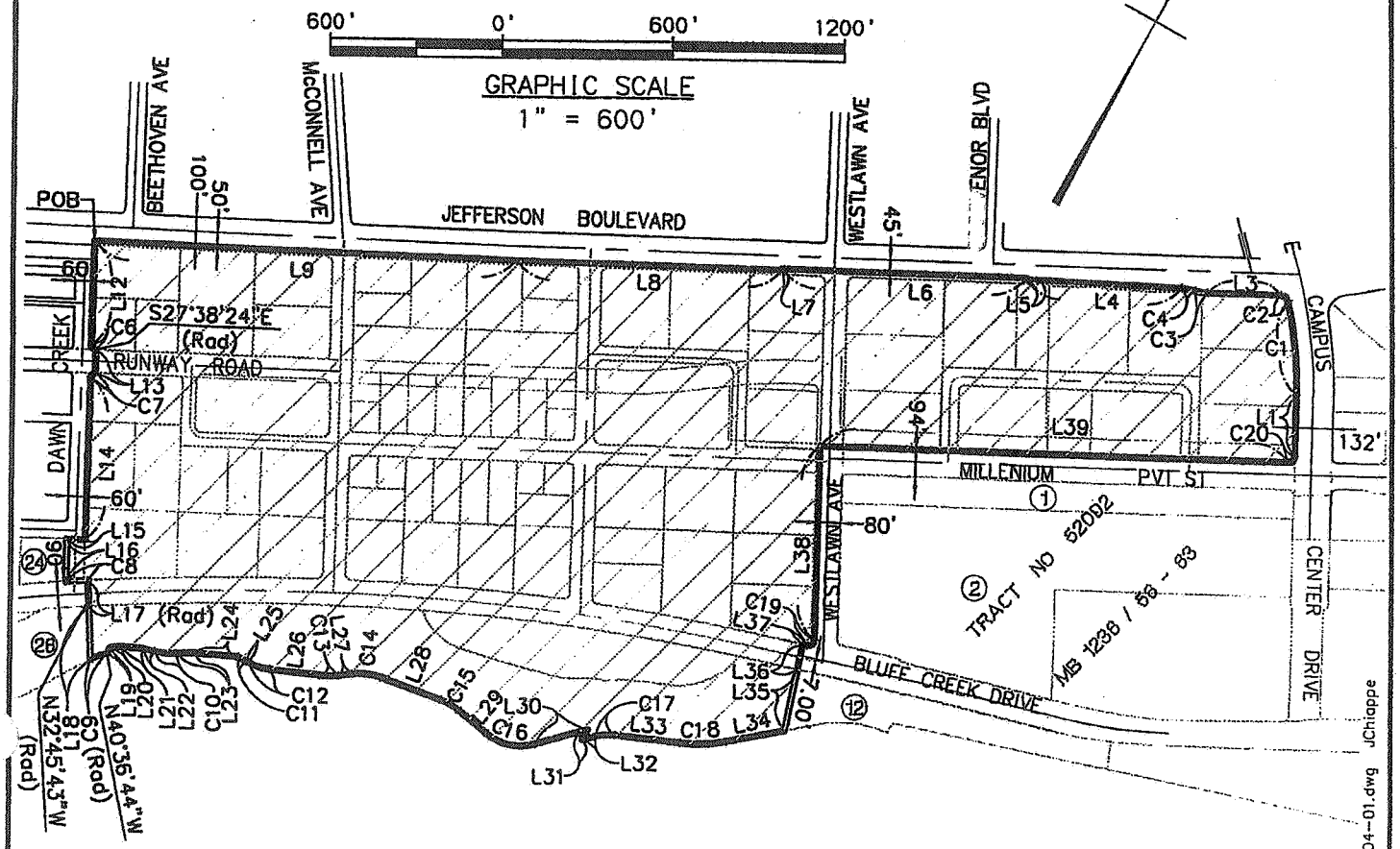
Date: 12/02/04

SCALE: 1" = 600'

SHEET 1 OF 1 SHEET

LEGAL DESCRIPTION MAP
TRACT NO 060110

IN THE CITY OF LOS ANGELES
COUNTY OF LOS ANGELES, STATE OF CALIFORNIA



CURVE TABLE			
CURVE	DELTA	RADIUS	LENGTH
C1	13°13'41"	1414.00	326.46
C2	76°40'43"	25.00	33.46
C3	16°50'51"	160.00	47.05
C4	15°45'23"	160.00	44.00
C6	90°00'00"	15.00	23.56
C7	90°00'00"	15.00	23.56
C8	0°27'30"	9246.00	73.94
C9	18°30'40"	185.00	59.77
C10	15°21'26"	285.00	76.39
C11	9°21'20"	215.00	35.11
C12	24°35'40"	185.00	79.41
C13	13°39'45"	285.00	67.96
C14	27°39'04"	215.00	103.76
C15	19°11'42"	215.00	72.03
C16	54°46'23"	185.00	176.85
C17	21°42'11"	185.00	70.08
C18	17°25'55"	515.00	156.69
C19	100°31'09"	20.00	35.09
C20	90°05'36"	20.00	31.45

LINE TABLE		
LINE	LENGTH	BEARING
L1	211.23	N27°44'00"W
L3	255.53	N62°21'36"E
L4	540.55	N63°27'04"E
L5	5.00	N27°38'24"W
L6	851.11	N62°21'36"E
L7	5.00	N27°38'24"W
L8	929.98	N62°21'36"E
L9	1467.90	N62°48'54"E
L12	360.65	N27°38'24"W
L13	80.00	N27°38'24"W
L14	557.00	N27°38'24"W
L15	60.00	N62°21'36"E
L16	147.41	N27°38'24"W
L17	90.00	N32°45'43"W
L18	185.30	N30°56'34"W
L19	23.73	N00°07'20"W
L20	36.85	N54°23'54"E
L21	76.33	N64°58'59"E
L22	41.03	N73°31'14"E
L23	60.91	N58°09'48"E
L24	158.00	N64°58'59"E
L25	5.37	N88°22'04"W

LINE TABLE		
LINE	LENGTH	BEARING
L26	173.26	N67°02'16"E
L27	46.68	N53°22'31"E
L28	217.64	N81°01'35"E
L29	124.32	N79°46'43"W
L30	195.67	N45°26'54"E
L31	42.03	N00°05'41"W
L32	48.68	N45°26'54"E
L33	231.04	N67°09'05"E
L34	208.77	N49°43'10"E
L35	217.03	N17°12'35"W
L36	90.00	N17°12'35"W
L37	16.60	N72°52'45"E
L38	670.54	N27°38'24"W
L39	1626.80	N62°21'36"E

Indicates Area of Legal Description

DATE: 11/10/04 REVISED ON: 12/02/04
JOB No: 1PCC020749

Plotted: 12/02/04 12:21:19 W:\PVista\SURVEY\LEGALS\EXHIBITS\PL\PV2-0004-01.dwg JChiappe

Playa Capital Company, LLC
Playa Vista Development

PV2-0004-01

PSOMAS
11444 West Olympic Boulevard
Suite 750
West Los Angeles, CA 90064
(310) 954-3700 (310) 954-3777 (FAX)

C. PUBLIC UTILITIES: WASTEWATER

APPENDIX C.i:
VILLAGE AT PLAYA VISTA SEWER RESEARCH, PSOMAS & ASSOCIATES, JANUARY 23, 2009

PSOMAS

To: Marc Huffman
Playa Capital Company, LLC
5510 Lincoln Boulevard, Suite 100
Playa Vista, CA 90094

From: Michael J. Crehan, P.E.

Date: January 23, 2009

Subject: Village at Playa Vista Sewer Research

Dear Marc:

This Sewer Research Memorandum summarizes the sewer capacity information in the November 14, 2008 and December 17, 2008 memoranda from Wastewater Engineering Services Division, Bureau of Sanitation to the Department of City Planning (attached as Exhibit A and B, respectively). This Sewer Research Memorandum includes data concerning (1) projected wastewater discharges for the Village at Playa Vista project and (2) capacity of sewer infrastructure in the vicinity of the Village at Playa Vista project.

As of 2008, the sewer infrastructure in the vicinity of the Village at Playa Vista project includes the existing 42-inch Marina Interceptor Sewer (MIS) on Jefferson Boulevard, which feeds into the Ballona Creek Pump Station, and then continues on to the 36-inch force main on Sepulveda Boulevard, before discharging into the 114-inch North Central Outfall Sewer (NCOS). Ultimately, the sewage from the proposed Village at Playa Vista site is then conveyed to the Hyperion Treatment Plant.

Table 1 (attached) summarizes various Average Dry Weather Flow (ADWF) and Peak Dry Weather Flow (PDWF) data provided by the Wastewater Engineering Services Division of the Bureau of Sanitation from the City's Mike Urban model – a model used to evaluate sewer flow and capacity in the City of Los Angeles. Table 1 also summarizes other capacity and flow information regarding the sewer conveyance infrastructure in the vicinity of the Village of Playa Vista project, including the design flow capacity and available capacity in 2010 and 2020.

1. The NCOS currently conveys a sewage flow of 55.4 mgd and 65.6 mgd for ADWF and PDWF, respectively. Future sewage flow in 2010 is projected to be 55.8 mgd and 66.1 mgd for ADWF and PDWF, respectively. Future sewage flow in 2020 is projected to be 58.0 mgd and 68.7 mgd for ADWF and PDWF, respectively. The design capacity of NCOS is approximately 248.2 mgd; therefore, the projected available capacity for the NCOS is 182.1 mgd and 179.5 mgd in 2010 and 2020, respectively.

2. Ballona Creek Pump Station currently conveys a sewage flow of 4.8 mgd and 8.0 mgd for ADWF and PDWF, respectively. Future sewage flow in 2010 is projected to be 5.03 mgd and 6.74 mgd for ADWF and PDWF, respectively. Future sewage flow in 2020 is projected to be 5.63 mgd and 7.54 mgd for ADWF and PDWF, respectively. The design capacity of

Ballona Creek Pump Station is approximately 27.4 mgd; therefore, the projected available capacity for the Ballona Creek Pump Station is 20.66 mgd and 19.86 mgd in 2010 and 2020, respectively.

3. The Ballona Creek Pump Station's sewage is conveyed to the NCOS via an existing 36" force main. The 36" force main has the same sewage flow and capacity as the Ballona Creek Pump Station.

4. Flows from the decommissioned Marina Pump Station are now diverted to the Ballona Creek Pump Station via a 42" wide Marina Interceptor Sewer on Jefferson Boulevard.

5. The MIS currently conveys a sewage flow of 1.4 mgd and 1.9 mgd for ADWF and PDWF, respectively. Future sewage flow in 2010 is projected to be 1.43 mgd and 1.91 mgd for ADWF and PDWF, respectively. Future sewage flow in 2020 is projected to be 1.60 mgd and 2.13 mgd for ADWF and PDWF, respectively. The design capacity of MIS is approximately 17.1 mgd; therefore, the projected available capacity for the MIS is 15.19 mgd and 14.97 mgd in 2010 and 2020, respectively.

6. The Hyperion Treatment Plan currently treats an average flow of 348.8 mgd. Future Hyperion Treatment Plant sewage flow in 2010 and 2020 is projected to be 351.9 mgd and 367.5 mgd, respectively. The design capacity of Hyperion Treatment Plant is approximately 450 mgd; therefore, the projected available capacity for the Hyperion Treatment Plant is 98.1 mgd and 82.5 mgd in 2010 and 2020, respectively.

7. Conclusively, as shown in Table 1, all existing sewer systems described above currently have, and are projected in 2010 and 2020 to have, sufficient excess capacities to convey the additional sewage flow of 0.47 mgd ADWF and 1.53 mgd PDWF from the Village at Playa Vista.

If you have any questions, please feel free to contact me at (213) 223-1400, or by e-mail at mcrehan@psomas.com.

Thank you.

Table 1

VILLAGE AT PLAYA VISTA
WASTEWATER FLOWS (IN MGD) THROUGH CONVEYANCE INFRASTRUCTURE

Wastewater Facility	2002 ADWF	2002 PDWF	2008 ADWF	2008 PDWF	2010 ADWF	2010 PDWF	2020 ADWF	2020 PDWF	Design Flow Capacity [a]	2010 Available Capacity [b]	2020 Available Capacity
MIS (42-inch) [d]	2.9	6	1.4	1.9	1.43	1.91	1.60	2.13	17.1	15.19	14.97
Ballona Creek Pump Station	2.9	6	4.8	8.0	5.03	6.74	5.63	7.54	27.4	20.66	19.86
36-Inch Force Main	2.9	6	4.8	8.0	5.03	6.74	5.63	7.54	27.4	20.66	19.86
NCOS	97	146	55.4	65.6	55.8	66.1	58.0	68.7	248.2	182.1	179.5

mgd = million gallons per day ADWF = Average Dry Weather Flow PDWF = Peak Dry Weather Flow

Notes:

[a] *Design Flow Capacity is based on the cross-sectional area of the pipeline. The design flow (or ¾ flow height) capacity constraints apply only to gravity sewers, such as the MIS and NCOS; force mains and pump stations (e.g., the 36-inch force main and Ballona Creek Pump Station) convey wastewater under pressure, thus they are not constrained at ¾ flow depth within the pipeline, and their design flow reflects full flow capacity.*

[b] *2010 available capacity is based on interpolated flow data for 2020, as provided by the City of Los Angeles Department of Public Works, and represents the available flow capacity in respective system components during peak flow months, without causing the sewer to become constrained (i.e., ¾ height capacity, where applicable). This is calculated by subtracting the 2010 projected peak flows from the ¾ height capacity (for gravity sewers) or the full flow capacity (for force mains and pump stations).*

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: November 14, 2008

TO: Greg Hamilton, Senior City Planner
Environmental Review Section
Department of City Planning

FROM: Brent Lorscheider, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Village at Playa Vista – Draft EIR**

This is in response to your September 18, 2008 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Residential (2 BR)	160 GPD/DU	2,600 DU	416,000
Office Building	180 GPD/1000 SQ.FT	175,000 SQ.FT	31,500
Retail	80 GPD/1000 SQ.FT	150,000 SQ.FT	12,000
Civil/Institutional Facilities	80 GPD/1000 SQ.FT	40,000 SQ.FT	3,200
Total			**462,700**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 42-inch Marina Interceptor Sewer (MIS) on Jefferson Blvd. The sewage from the existing line feeds into the Ballona Creek Pump Station, and then continues onto a 36-inch force main on Sepulveda Blvd, before discharging into the 114-inch North Central Outfall Sewer (NCOS). Ultimately, the sewage flow will be conveyed to the Hyperion Treatment Plant.

Based on available Mike Urban modeling data, the current dry weather condition of this sewer system is as follows:

- MIS has an approximate average flow of 1.4 MGD and peak flow of 1.9 MGD.
- NCOS has an approximate average flow of 55.4 MGD and a peak flow of 65.6 MGD.
- Ballona Creek Pump Station has an approximate average flow of 3,359 GPM and a peak flow of 5,543 GPM.

- Hyperion Treatment Plant treats an average flow of 348.8 MGD.

Based on Mike Urban modeling data, the projected dry weather conditions for the year 2010 and 2020 for the NCOS and Hyperion Treatment Plant is as follows:

- The projected average flow for the NCOS in 2010 and 2020 is 55.8 MGD and 58.0 MGD, respectively.
- The projected average flow for the Hyperion Treatment Plant in 2010 and 2020 is 351.9 MGD and 367.5 MGD, respectively.

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. If the local sewer line has insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time.

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE.

DATE: December 17, 2008

TO: Greg Hamilton, Senior City Planner
Environmental Review Section
Department of City Planning

FROM: Brent Lorscheider, Acting Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Village at Playa Vista – Draft EIR**

This is in response to your December 9, 2008 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Residential (2 BR)	160 GPD/DU	2,600 DU	416,000
Office Building	180 GPD/1000 SQ.FT	175,000 SQ.FT	31,500
Retail	80 GPD/1000 SQ.FT	150,000 SQ.FT	12,000
Civil/Institutional Facilities	80 GPD/1000 SQ.FT	40,000 SQ.FT	3,200
Total			**462,700**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 42-inch Marina Interceptor Sewer (MIS) on Jefferson Blvd. The sewage from the existing line feeds into the Ballona Creek Pump Station, and then continues onto a 36-inch force main on Sepulveda Blvd, before discharging into the 114-inch North Central Outfall Sewer (NCOS). Ultimately, the sewage flow will be conveyed to the Hyperion Treatment Plant.

Based on Mike Urban modeling data, the projected dry weather conditions for the year 2010 and 2020 for the MIS, 36-inch Force Main, and the NCOS are as follows:

Sewer	ADWF (MGD)		PDWF (MGD)	
	2010	2020	2010	2020
MIS	1.43	1.60	1.91	2.13
36-inch Force Main	5.03	5.63	6.74	7.54
NCOS	55.8	58.0	66.1	68.7

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. If the local sewer line has insufficient capacity then the developer will be required to build a secondary line to the nearest larger sewer line with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time.

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

APPENDIX C.ii:
ANALYSIS OF WASTEWATER ISSUES REGARDING VILLAGE AT PLAYA VISTA PROJECT AND HYPERION SERVICE AREA WASTEWATER FLOWS, CH2MHILL, NOVEMBER 11, 2008

TECHNICAL MEMORANDUM CH2MHILL

Playa Vista – Analysis of Wastewater Issues Regarding Village at Playa Vista Project and Hyperion Service Area Wastewater Flows

PREPARED FOR: Bruce Lackow
Christopher A. Joseph & Associates

PREPARED BY: Judi Miller, PE/CH2M HILL
Jeff Friesen, PE/CH2M HILL
Devang Parikh/MapVision

DATE: November 11, 2008

PROJECT NUMBER: 371684

This Technical Memorandum has the following purposes:

1. to provide wastewater flow projections for Hyperion Service Area (HSA) for 2010 and 2020, which is the area tributary to the City of Los Angeles' (City) Hyperion Treatment Plant (Hyperion),
2. to assess the capacity of Hyperion to accept and treat the anticipated wastewater flows from the HSA and the proposed Village at Playa Vista project at years 2010 and 2020.

Wastewater flow projections are provided in this Technical Memorandum for three years: 2005, 2010, and 2020.[1] In 2006, the City of Los Angeles' (City's) sewer master planning group adopted a new calibration procedure that provides projections which are more reflective of current flow conditions. The analysis conducted in this Technical Memorandum applies this calibration procedure that adjusts the modeled dry weather flows to the actual average dry weather flows observed for 2005 to be consistent with the City's flow projections procedures. Using these calibrated average dry weather flows, projected wastewater flows were generated for 2010 and 2020.

As explained further below in Table 4 and in the text associated with the table, the wastewater flow generation unit rates currently used for residential and employee populations by the City are slightly lower than those used in this study. The higher values were used in this Technical Memorandum to avoid confusion by maintaining consistency with the analyses conducted in the Integrated Plan for the Wastewater Program (IPWP), which was used to prepare the 2003 Draft Environmental Impact Report for the Village at Playa Vista project; these higher unit rates were also used in the Integrated Resources Plan (IRP). However, since the wastewater flow generation unit rates used in this Technical

[1] This memorandum analyzes wastewater flow projections, which are distinct from, but often confused with stormwater flows. Wastewater consists of sanitary and industrial waste flows that are collected and transmitted in the sanitary sewer system. The City's wastewater plants treat all of their sanitary sewage to secondary or tertiary levels before it is discharged into water bodies such as the Los Angeles River or the Santa Monica Bay. Secondary treatment removes organic and inorganic solids duplicating purification processes found in nature, including biological treatment and clarification. Tertiary treatment includes the filtration and disinfection of secondary effluent for recycled water use.

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Memorandum are higher than those used by the City, the uncalibrated results presented in Table 9 of this Technical Memorandum are conservatively high.

The projected Playa Vista wastewater flows used in this analysis are 0.47 mgd of average dry weather flow as shown in Table 1 below.[2] Average dry weather flow represents the estimated annual average flows for residential and commercial sanitary flows, average groundwater infiltration, and industrial flows, and is used to evaluate treatment plant process capacities. Peak dry weather flow represents the peak diurnal flows which correspond to high indoor water usage when people are in their residences, such as during early morning and early evening household activities. Flows will peak in the collection system at various times, depending on the travel time from the point of initial flow generation to its terminus at the treatment facilities. Peak dry weather flow is typically considered as the design basis for sanitary sewers. Such instantaneous peaks are dampened by the time they reach the treatment plant, particularly for extensive systems such as that within the Hyperion Service Area, and for such large treatment plants such as Hyperion. Peak dry weather flow is not typically used for the design or evaluation of treatment plant process capacities because the peak flows do not occur simultaneously over the entire service area.

TABLE 1
PROPOSED PROJECT WASTEWATER GENERATION, PSOMAS, JANUARY 20, 2005

	Land Use	Average Dry Weather Generation Factor	Average Dry Weather Flow
Residential[a] (d.u.)	2,600	160 gpd/d.u.	416,000 gpd
Office[b] (sq.ft.)	175,000	0.203 gpd/sq.ft.	35,525 gpd
Retail (sq.ft.)	150,000	0.080 gpd/sq.ft.	12,000 gpd
Civic/Inst.[c](sq.ft.)	40,000	0.080 gpd/sq.ft.	3,200 gpd
Total			**0.47 mgd**

[a] *Residential wastewater generation factor is the average value of factors for studio, 1 bedroom, 2 bedroom, 3 bedroom, and 4 bedroom housing units, or 160 gpd. Using the average factor of 160 gpd for all dwelling units results in a more conservative assessment of wastewater generation.*

[b] *Office factor includes 53 gpd of wastewater generation from operation of cooling towers and toilets (30 gpd for cooling and 23 gpd for toilets).*

[c] *The community center factor presented in the City of L.A. CEQA Guide is based upon the number of occupants and applies specifically to community center uses. As the civic/institutional facilities in the Urban Development Component will include a community center, which is similar in intensity and use as retail facilities, the retail factor was used to calculate projected wastewater generation.*

Source: City of Los Angeles, "L.A. CEQA Thresholds Guide," 2006.

[2] The Psomas Sewer Area Study Calculation and Report provides a detailed calculation of peak dry weather flow, and estimates it to be 2.3666 cfs, or 1.53 mgd.Psomas, "Sewer Area Study Calculations and Report for Playa Vista – Phase 2 Tract 60110-01," January 20, 2005. However, use of 0.47 mgd, the projected average Village at Playa Vista flow, is an appropriate figure to use to calculate projected maximum month wastewater flows in 2010 and 2020 because treatment plant capacity is tied to average day dry weather flows rather than peak day dry weather flows that occur diurnally. Notably, even if this updated analysis is conducted with peak day dry weather flow of 1.53 mgd from the Village at Playa Vista, remaining excess HSA treatment capacity is only 1 mgd less, and still well within HSA's effective treatment capacity. Thus, the analysis projects excess HSA treatment capacity in 2010 or 2020 using either the average Village at Playa Vista flow or the peak day dry weather Village at Playa Vista flows.

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1. Hyperion Treatment Plant (Hyperion) and Hyperion Service Area (HSA)

Hyperion and its associated HSA are shown in Figure 1. The HSA encompasses 515 square miles serving most of the City of Los Angeles, as well as non-City agencies that contract with the City for sewerage services ("contract agencies") that include other incorporated cities, portions of unincorporated Los Angeles County, federal agencies, and others. Within the HSA are two wastewater treatment plants in addition to Hyperion: the Tillman Water Reclamation Plant (TWRP) and the Los Angeles-Glendale Water Reclamation Plant (LAGWRP).

FIGURE 1 – HYPERION SERVICE AREA

TWRP and LAGWRP treat and discharge wastewater generated within the HSA to tertiary levels, effectively removing or extracting flows from the HSA and reducing wastewater flows at Hyperion. The solid material removed from the wastewater at TWRP and LAGWRP during the treatment process, known as sludge, is returned to the sewer system for conveyance to Hyperion for treatment. As detailed further below, this return flow from

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TWRP and LAGWRP impacts the HSA's total effective capacity because this flow is essentially treated twice.

2. Flow Projection Methodology

The methodology used in this analysis to predict wastewater flows in the HSA is consistent with current practices at the City's Department of Public Works, Bureau of Sanitation's Wastewater Engineering Services Division (WESD). Further, the City's Sewer Flow Estimating Model was used to generate the average dry weather flows presented herein. The Sewer Flow Estimating Model is a geographic information system (GIS)-based flow projection computer model developed for the City by CH2M HILL in the early 1990s.

Sewer Flow Estimating Model incorporates the following data into wastewater flow projections:

- Industrial flows greater than 10,000 gallons per day (gpd);
- Flows from contract agencies;
- Groundwater infiltration, which is assumed to increase at 0.5 percent per year, and is based upon a 1992 infiltration and inflow study done for the City of Los Angeles by CH2M HILL[3];
- Residential and employee population projections; and
- Land use and associated relative residential densities.

For this study, all data noted above, with the exception of the population and employee projections, were obtained from the City. Southern California Association of Governments (SCAG) 2008 population and employee projections were acquired for this study. The 2008 data are the most current official data at the time of writing and were based on year 2000 census data.[4]

The flow estimation process proceeded through the steps described below. The uncalibrated flows were derived in the same manner, but an effective calibration factor of 1.0 was applied (i.e., no scaling of projected flows was done).

1. Obtain updated SCAG population and employee projections (SCAG, 2008) through year 2020. These projections for the HSA are shown in Table 2.

TABLE 2
2008 SCAG-BASED POPULATION AND EMPLOYEE PROJECTIONS FOR HSA

Year	Residential Population	Employee Population
2005	4,272,014	2,255,434
2010	4,383,417	2,324,188
2020	4,544,728	2,413,735

[3] City of Los Angeles, Final Report – Infiltration/Inflow Reduction Plan, January 1992.

[4] The wastewater projections in the 2003 Draft EIR for the Village at Playa Vista project used population and employee SCAG data from the 1998 Regional Transportation Plan, which was based on 1990 census data. The wastewater flows produced for the Integrated Resources Plan (IRP) were developed with Sewer Flow Estimating Model, using year 2001 SCAG population and employee projections that was also based on 1990 census data.

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2. Obtain TWRP, LAGWRP, and Hyperion average discharge flows from the City (WESD) for 2005. These plant flows are shown in Table 3. The return flow represents sludge removed from the upstream plants (TWRP and LAGWRP) that is returned to the sewers for treatment at Hyperion. Extracted flow refers to the flow that is treated to secondary or tertiary levels by the HSA plants and discharged to the receiving waters (Los Angeles River or Santa Monica Bay).

TABLE 3 – RECLAMATION AND TREATMENT PLANT FLOWS – 2005

Plant	Influent (mgd)	Return Flow (mgd)	Extracted Flow (mgd)*
LAGWRP	17.1	1.5	15.6
TWRP	55.8	11.9	43.9
Hyperion	355	n/a	355

Notes

* Extracted flow includes water reuse and discharge.
n/a – not applicable

3. Reformat the SCAG projections so that they can be utilized in the Sewer Flow Estimating Model.

4. Run the Sewer Flow Estimating Model for the entire HSA for the year 2005 producing average wastewater flows. Two wastewater generation unit rates are key factors for generating the flow projections: one unit rate for residential population, and one unit rate for employees. These are shown in Table 4:

TABLE 4
WASTEWATER GENERATION UNIT RATES

Source	Wastewater Generation Rate[1]	Units
Residential Population	81	gpcd[2]
Employees	24	gped[3]

Notes:
[1] Values currently used by the City of Los Angeles for sewer system planning purposes are 78 gpcd and 23 gped for residential and employee populations, respectively. The higher values noted in this table are more conservative; but since these higher numbers were used in the IPWP, which was relied upon in the 2003 Draft EIR for the Village at Playa Vista, and the IRP, this analysis applies these same higher numbers here for consistency.
[2] Gallons per Capita per Day
[3] Gallons per Employee per Day

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The assumed rate of groundwater infiltration will also significantly affect the calculated flow rate. To be consistent with the previous IRP flow projections, and with the City's current planning practice, the average groundwater infiltration rate within the Sewer Flow Estimating Model was applied. Groundwater infiltration rates derived in the City's 1992 infiltration and inflow study form the basis of the groundwater infiltration rate projections, with an increase of 0.5 percent per year.

5. Derive the model calibration factor. This was done in the following steps:

    a. Sum the 2005 recorded treated flows at TWRP, LAGWRP, and Hyperion to produce the total flows treated from within the HSA, and

    b. Divide result from the step above by the modeled flow. The resulting factor was then applied to the 2010 and 2020 model results to scale the flows appropriately.

    The calibration factor was generated as follows:

    Total HSA treated flow in 2005 = 355 mgd + 15.6 mgd + 43.9 mgd = 415 mgd

    Model-generated 2005 HSA flow = 455 mgd

    Calibration Factor = 415 mgd / 455 mgd = **0.91**

6. Rerun the model for years 2010 and 2020. Only residential and employee population figures are altered for the future model runs, although, as noted above, the model also automatically increases the assumed groundwater infiltration rate with time.

7. Scale the model results by the calibration factor.

8. Subtract the anticipated TWRP and LAGWRP treatment rates from the scaled model results for the entire HSA. Reclamation and treatment plant capacities are presented in Table 5. The "effective capacity" is derived by reducing the rated capacity by the return flows.

9. Compare the resulting projected HSA flows with the anticipated HSA capacities, and assess the affects of adding the proposed Village at Playa Vista wastewater discharge to the overall HSA treatment capacity. Consider both average flows and maximum month flows. Maximum month daily flow represents the average daily flow that occurs during the month of highest wastewater flows. This corresponds to the wettest month, during which domestic and industrial sewage is augmented by infiltration and inflow into the sewerage system.[5] Maximum month flows are derived by increasing the average flows by 6.3 percent.[6]

---

[5] Note that as explained above, wastewater is distinct from stormwater flow, however, during precipitation events, domestic and industrial sewage in the sanitary sewer system is augmented by infiltration from groundwater into cracks and other openings in sewer pipes and inflow through manhole covers from flooded streets. This infiltration and inflow increases the volume of wastewater in the sewer system in these wet months.

[6] Integrated Plan for the Wastewater Program, Tools Technical Memorandum, page 4-42. The maximum month flow design basis was derived in the City's 1990 Wastewater Facilities Plan (DMJM/Black & Veatch, 1990) that determined the need for upgrade of Hyperion to full secondary treatment. This maximum month flow represents an annual peak flow period in Hyperion Service Area that typically lasts for about 5 weeks. Comparing weekday flows from this 5-week period to annual average flows results in a factor of 6.3 percent.

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Although long-term planning for treatment facilities is typically based on average dry weather flow conditions, the maximum month criterion is referenced here because it was applied during the Village at Playa Vista project. The IPWP, IRP and other local wastewater facilities planning efforts for large systems[7] are based on average dry weather flow conditions rather than maximum month conditions. Peak flows during a maximum month averages out during the course of any calendar year and are accommodated during the peak month by the excess capacity that is already designed and built into the treatment facility. Such excess capacity is typically maintained by sewerage agencies in advance of the need for such capacity, whether for average or peak flows, through the agencies' long term planning process.

[7] Sewerage agencies recognize the high degree of variability and uncertainty inherent in long-term wastewater flow projections. "…flow projections can vary significantly depending on the assumed per capita generation rate and the sensitivity of these numbers to water conservation practices. If wastewater flows develop more rapidly than flow projections indicate, the proposed facilities would be built sooner to match the growth. If, on the other hand, wastewater flows develop more slowly than flow projections indicate, the construction of proposed facilities would be delayed." *2010 Joint Outfall System Master Facilities Plan, County Sanitation Districts of Los Angeles County, June, 1995.*

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TABLE 5 – HSA TREATMENT PLANT CAPACITIES - 2010 AND 2020

PLANT	2010			2020									
				Without TWRP Expansion					With TWRP Expansion				
					Effective Capacities after Return Flows[2] (mgd)					Effective Capacities after Return Flows[2] (mgd)			
	Rated Capacity (mgd)[1]	Sludge Return (% of influent flow)	2010 Effective Capacity (mgd)	Rated Capacity	Post Sludge Return	MF Effluent 10%	RO Effluent 15%	2020 Effective Capacity	Rated Capacity	Post Sludge Return	MF Effluent 10%	RO Effluent 15%	2020 Effective Capacity
TWRP	80	6.55%	75	80	75	67	57	57	100	93	84	71	71
LAGWRP	20	5.80%	19	20	19	17	14	14	20	19	17	14	14
Hyperion	450		450	450				450	450				450
Total HSA Capacity			**544**					**522**					**536**

Notes:

[1] While the IRP assumed derated capacities for the TWRP and LAGWRP based on pilot-scale process testing, full-scale operation of the converted plants have demonstrated that the plants are able to achieve the required nitrogen reduction at full plant capacity, i.e., without realizing any plant capacity derating.

[2] The IRP recommended implementation plan for 2020 included potential installation of advanced treatment processes [microfiltration (MF) and reverse osmosis (RO) with advanced oxidation (AOX)] at the TWRP and LAGWRP, if necessary to comply with more stringent regulations.

Example calculations, using TWRP:

2010 Effective Capacity: 80 mgd x (1-0.0655) = 75 mgd

2020 Effective Capacity, without TWRP expansion:

a) 80 mgd x (1-0.0655) = 75 mgd (Post Sludge Return Effective Capacity)

b) 75 mgd x (1-0.10) = 67 mgd (MF Effluent)

c) 67 mgd x (1-0.15) = 57 mgd (RO Effluent = 2020 Effective Capacity)

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3. Results

The results of the Sewer Flow Estimating Model runs are presented in Table 6. The modeled average wastewater flow values in Table 6 (Column G) represent the total uncalibrated flows projected within the HSA. Routine protocol for the City of Los Angeles' sewer master planning process is to calibrate the flows projected by the Sewer Flow Estimating Model to the current systemwide flows, as noted in step 5, above. The calibrated HSA projected flows (Column I) are combined with the estimated Village at Playa Vista average dry weather flow discharge and evaluated relative to the HSA treatment capacity in Table 5.

The results summarized in Table 7 (Column E) demonstrate that using the City's current procedures and 2008 SCAG data, the HSA will have sufficient capacity within the three plants to treat the projected average daily wastewater flows from the Village at Playa Vista in 2010 and 2020. Additionally, this analysis applies the most conservative values for HSA effective treatment capacity (i.e., 522 mgd effective treatment capacity available in 2020 vs. 536 mgd if expansion at the TWRP was to occur), assuming implementation of advanced treatment at TWRP, but no 20 mgd expansion at TWRP.[8] Thus, the conclusion that HSA will have sufficient capacity within the three HSA plants to treat the projected average daily wastewater flows from the Village at Playa Vista in 2010 and 2020 is conservative and is true, even if without an expansion to the existing HSA plants and even with the implementation of advanced treatment at TWRP (which reduces the effective treatment capacity of the HSA).

Table 8 repeats the analysis presented in Table 7, but for maximum month wastewater flows, derived per step 9, above. Table 8 (Column E) also indicates that the HSA will have sufficient capacity within the three plants to treat the projected average daily wastewater flows from the Village at Playa Vista in 2010 and 2020 during maximum month conditions. As with the conclusion for average daily HSA wastewater flows, this is evaluated relative to a conservative assessment for HSA effective treatment capacity, in which the least potential future treatment capacity in the HSA is available, i.e., no expansion to the TWRP occurs and advanced treatment (which reduces the effective treatment capacity) is implemented by 2020.

4. Analysis With Uncalibrated Data

Since wastewater impacts of the proposed Village at Playa Vista project initially was analyzed in the 2003 Draft EIR and that analysis used uncalibrated flows, Table 9 summarizes uncalibrated flow projections combined with the Village at Playa Vista flow estimates to assess HSA treatment capacity. Importantly, as noted in the introduction to this Technical Memorandum, in 2006 the City's sewer master planning group adopted a new calibration procedure that provides more refined wastewater flow projections. Nonetheless, to provide an opportunity to compare the previous and present analyses, Table 9 summarizes the wastewater impacts of the proposed project using (the outdated) uncalibrated projections. These flow projections are approximately 10 percent greater than

[8] The IRP Recommended Plan included a potential 20 mgd treatment capacity expansion at TWRP. Additionally, in the future, TWRP and LAGWRP may begin implementing additional, more intensive wastewater treatment processes (micro-filtration ("MF"), reverse osmosis ("RO") and advanced oxidation (AOX)). While this would produce more highly treated effluent for reuse and discharge from TWRP and LAGWRP, the additional treatment, when implemented, would increase the amount of return flows that will be conveyed to Hyperion through the sewer system for further treatment.

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the calibrated flow projections, yet as indicated in Table 9, the analysis reveals that even with uncalibrated wastewater flow projections, HSA would still have sufficient capacity within the three plants to treat the projected maximum month daily wastewater flows from the Village at Playa Vista in 2010 and 2020. Additionally, as with the analysis of Tables 7 and 8, the analysis in Table 9 is even more conservative because it utilizes conservative wastewater generation unit rates and a conservative assessment for HSA effective treatment capacity where advanced treatment at TWRP and LAGWRP are employed, but no TWRP expansion has been conducted. Even with these most conservative assumptions, and with the uncalibrated projections, the study demonstrates that HSA will have sufficient capacity within the three HSA plants to treat the projected average daily wastewater flows from the Village at Playa Vista in 2010 and 2020.

5. Conclusion

The wastewater flow estimation analysis above indicates that there will be more than adequate available treatment plant capacity in both 2010 and 2020 to accommodate the projected wastewater generated by the proposed Village at Playa Vista project and cumulative growth. As such, the contribution of wastewater flows from the proposed Village at Playa Vista, combined with the cumulative projected increase in wastewater flows within the HSA, will not trigger a need for expansion of Hyperion, to which the Village will directly convey its wastewater.

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TABLE 6
SFEM MODELING RESULTS FOR HYPERION TREATMENT PLANT- 2005 THROUGH 2020

Year	Residential Population	Employee Population	Average Residential Population Flows (MGD)	Average Employee Flows (MGD)	Average Industrial and Contract Flows[1] (MGD)	Average GWI[2] (MGD)	Uncalibrated Average Dry Weather Flows (MGD)	Calibration Factor	Calibrated Average Wastewater Flow (MGD)	Uncalibrated Max. Month Dry Weather Flow (MGD)	Calibrated Max. Month Dry Weather Flow (MGD)
Column:	A	B	C	D	E	F	G	H	I	J	K
2005	4,272,014	2,255,434	346	54	25	30	456.0	0.91	414.8	484.8	441.0
2010	4,383,417	2,324,188	355	56	25	31	467.5	0.91	425.2	496.9	452.0
2020	4,544,728	2,413,735	368	58	25	33	484.3	0.91	440.5	514.8	468.3

Notes:

Values in Column C are obtained by multiplying Column A by 81 gpcd.

Values in Column D are obtained by multiplying Column B by 24 gped.

Values in Column G are the sum of columns C through F.

Values in Column I are obtained by multiplying Column G by Column H.

Values in Column J are obtained by multiplying Column G by 1.063 (per IPWP Tools Technical Memorandum, page 4-42).

Values in Column K are obtained by multiplying Column I by 1.063.

[1] Only industrial flows greater than 10,000 gpd are included as major point discharges in the SFEM and represents the vast majority (75% in 2002[7]). The remaining industrial contribution is accounted for in the commercial per capita flow rate.

[2] Average GWI for 2005 is calculated in the SFEM applying an increase above 1992 values of 0.5 percent per year.

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TABLE 7
HSA PROJECTED AVERAGE WASTEWATER FLOWS - 2010 AND 2020

Year	Effective Treatment Capacity (mgd)	Calibrated Average Dry Weather Flow (mgd)	Excess HSA Treatment Capacity (mgd)	Average Village at Playa Vista Flow (mgd)	Remaining Excess HSA Treatment Capacity (mgd)
	A	B	C	D	E
2010	544	425.2	118.8	0.47	118.3
2020	522[1]	440.5	81.5	0.47	81.0

Notes:

Values in Column C are the differences between Columns A and B.
Values in Column E are the differences between Columns D and C. A positive value indicates excess HSA treatment capacity. (A negative value would indicate insufficient HSA treatment capacity.)

[1] Effective capacity with advanced treatment but without TWRP expansion, per Table 5

TABLE 8 – HSA PROJECTED MAXIMUM MONTH WASTEWATER FLOWS - 2010 AND 2020

Year	Effective Treatment Capacity[1] (mgd)	Calibrated Max. Month Dry Weather Flow (mgd)	Excess HSA Treatment Capacity (mgd)	Average Village at Playa Vista Flow (mgd)	Remaining Excess HSA Treatment Capacity (mgd)
	A	B	C	D	E
2010	544	452.0	92.0	0.47[1]	91.5
2020	522[2]	468.3	53.7	0.47[1]	53.2

Notes:

Values in Column C are the differences between Columns A and B.
Values in Column E are the differences between Columns D and C. A positive value indicates excess HSA treatment capacity. (A negative value would indicate insufficient HSA treatment capacity.)

[1] Use of 0.47 mgd, the projected average Village at Playa Vista flow, is an appropriate figure to use to calculate projected maximum month wastewater flows in 2010 and 2020 because treatment plant capacity is tied to average day dry weather flows rather than peak day dry weather flows that occur diurnally. Nonetheless, the analysis in the original DEIR used peak day dry weather flow. Notably, however, even if the analysis is conducted with peak day dry weather flow of 1.53 mgd from the Village at Playa Vista, remaining excess HSA treatment capacity is only 1 mgd less, and still well within HSA's effective treatment capacity. Thus, the analysis projects excess HSA treatment capacity in 2010 or 2020 using either the average Village at Playa Vista flow or the peak day dry weather Village at Playa Vista flows.

[2] Effective capacity with advanced treatment but without TWRP expansion, per Table 5

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TABLE 9
HSA PROJECTED AVERAGE AND MAXIMUM MONTH UNCALIBRATED WASTEWATER FLOWS – YEAR 2020, WITHOUT TWRP EXPANSION

Projected Flow Condition	Effective Treatment Capacity[1] (mgd)	Uncalibrated Max. Month Dry Weather Flow (mgd)	Excess HSA Treatment Capacity (mgd)	Average Playa Vista Flow (mgd)	Remaining Excess HSA Treatment Capacity (mgd)
	A	B	C	D	E
Average	522	484.3	37.7	0.47	37.2
Maximum Month	522	514.8	7.2	0.47	6.7

Notes:

Values in Column C are the differences between Columns A and B.
Values in Column E are the differences between Columns D and C. A positive value indicates excess HSA treatment capacity. (A negative value would indicate insufficient HSA treatment capacity.)

[1] With advanced treatment.

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APPENDIX C.iii:
TECHNICAL REPORT ON CUMULATIVE WASTEWATER IMPACTS, MBC APPLIED ENVIRONMENTAL SCIENCES AND FLOW SCIENCE, INC., DECEMBER 4, 2008.

VILLAGE AT PLAYA VISTA

TECHNICAL REPORT ON CUMULATIVE WASTEWATER IMPACTS

Prepared by
MBC *Applied Environmental Sciences* and
Flow Science Incorporated

for

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11849 W. Olympic Blvd., Suite 1101
Los Angeles, CA 90064

December 4, 2008

TABLE OF CONTENTS

SECTION PAGE

1.0 INTRODUCTION 1

2.0 DESCRIPTION OF HYPERION TREATMENT PLANT 1

2.1 Facility Description 1
2.1.1 Summary of Treatment Processes at Hyperion 3
2.1.2 Outfall Descriptions 4
2.1.2.1 One-Mile Outfall (Discharge 001): 4
2.1.2.2 Five-Mile Outfall (Discharge 002): 5
2.1.2.3 Seven-Mile Outfall (Discharge 003): 6
2.2 Water Quality Laws And Regulations Concerning HTP's Treatment and Discharge of wastewater 6
2.2.1 HTP NPDES Permit Requirements and Origin of Those Permit Limits 9
2.2.2 Public Process and Action 17
2.2.3 Analysis of Effluent Plume Associated With Discharge From Five-Mile Outfall and Limitations Under NPDES Permit 17
2.2.4 Emerging Contaminants 21

3.0 DESCRIPTION OF SANTA MONICA BAY 24

3.1 Physical Description 24
3.1.1 Physical Features 24
3.1.2 Tides and Currents 25
3.2 Biological Description 25
3.3 Sediment and Water Quality 27
3.3.1 Sediment Quality 27
3.3.2 Water Quality 28
3.3.3 Pollutant Sources 29

4.0 ASSESSMENT OF IMPACTS OF WASTEWATER DISCHARGES FROM HYPERION ON SANTA MONICA BAY 32

4.1 General Description of Wastewater Plume Mixing 32
4.2 Description of Physical Effects 33
4.3 Description of Biological Effects 33
4.4 Evaluating Potential Impact Of Proposed Project 35
4.5 Modeled Impacts From Discharge Flow Volumes From Hyperion Treatment Plant 35
4.5.1 Hyperion Five-Mile Outfall Dilution Analysis 37
4.5.2 Ambient sea water profiles 39
4.5.3 Analysis of effluent plumes 40
4.5.3.1 Analytic method 41
4.5.3.2 Visual plumes 42
4.5.4 Modeling Results 43

5.0 ASSESSMENT OF PROJECT IMPACTS 51

6.0 LITERATURE CITED 53

LIST OF TABLES

Table 1. HTP effluent limits for conventional pollutants. 10
Table 2. Ocean Plan Water Quality Objectives (Table B). 12
Table 3. Nearshore and offshore beneficial uses of Santa Monica Bay. 16
Table 4. Average concentrations of conventional constituents and other pollutants in the HTP five-mile outfall effluent, and NPDES permit limits. Source: CLA-EMD (2007a). 20
Table 5. Minimum, average, and maximum concentrations of conventional constituents and other pollutants in the HTP five-mile outfall effluent after initial dilution, and California Ocean Plan objectives. Source: CLA-EMD (2007a). 21
Table 6. Mean annual loadings of trace metals to watersheds in the Los Angeles coastal region 1. From Sabin et al. (2005b). 31
Table 7. HTP Five-mile outfall diffuser configurations 38
Table 8. Discharge scenarios. 38
Table 9. Properties of the five-mile outfall effluent. 39
Table 10. Sea water temperature (ºC) profile near the diffuser. 39
Table 11. Sea water salinity (parts per thousand [ppt]) profile near the diffuser. 40
Table 12. Results from the analytic method. 42
Table 13. Results from Visual Plumes. 44
Table 14. Differences between selected Visual Plumes runs. 48

LIST OF FIGURES

Figure 1. Location of the Hyperion Treatment Plant (HTP) in relation to the site of the Proposed Project. 3
Figure 2. Location of the three Hyperion Treatment Plant (HTP) outfalls. The five-mile outfall (Serial No. 002) is shown in blue. 6
Figure 3. Average daily effluent discharge volumes (mgd) at the HTP by year, 1998-2008. Note: 2008 data includes January through July. 36
Figure 4. Minimum, average, and maximum daily effluent discharge volumes (mgd) at the HTP by month, January 1998-July 2008. Green line represents monthly rainfall recorded in Manhattan Beach, January 1998-September 2006. 37

1.0 INTRODUCTION

The Village at Playa Vista development site is located in the City of Los Angeles generally south of Ballona Creek, east of Lincoln Boulevard, west of Interstate 405, and north of the Westchester Bluffs. The Proposed Project consists of residential, office, and retail development, community-serving uses, and construction of a riparian corridor.

In its September 13, 2007 decision, the Court of Appeal directed that the City of Los Angeles to vacate the project approvals and certification of the environmental impact report (EIR), and to revise the Village at Playa Vista EIR "to identify the intended and likely measures to dispose of the project's wastewater and analyze the environmental impacts of employing those measures to dispose of the wastewater generated by the project, including any cumulative impacts to the Santa Monica Bay." In response to this decision, the City of Los Angeles has requested this analysis to determine potential cumulative impacts from the Proposed Project on water quality and biological resources in Santa Monica Bay resulting from an increase in wastewater discharged through the Hyperion Treatment Plant's ocean discharges.

2.0 DESCRIPTION OF HYPERION TREATMENT PLANT

The following section provides descriptions of the Hyperion Treatment Plant (HTP), including descriptions of the HTP's wastewater outfalls, treatment processes, and NPDES permit.

2.1 FACILITY DESCRIPTION

The HTP is located in Playa del Rey, California (Figure 1). The HTP is part of a joint outfall system known as the Hyperion Treatment System, which consists of the wastewater collection system, the HTP, and three upstream wastewater treatment plants: (1) Donald C. Tillman Water Reclamation Plant, (2) Los Angeles-Glendale Water Reclamation Plant, and (3) Burbank Water Reclamation Plant.[1] The Hyperion Treatment System collects, treats, and disposes of sewage from most of the City of Los Angeles, as well as Santa Monica, Culver City, unincorporated portions of Los Angeles County, and an additional 27 agencies. These cities and agencies are under contract with the City of Los Angeles for wastewater treatment at the City's facilities (City of Los Angeles 2003). Approximately 85 percent of the sewage and commercial/industrial wastewater originates from the City, and the remaining approximately 15 percent

[1] The Burbank Water Reclamation Plant is owned by the City of Burbank, and therefore is not technically part of the Hyperion Treatment System, which is owned by the City of Los Angeles. Under contract, sludge from the Burbank plant is returned to the City of Burbank sewer system for treatment at the HTP, and the influent to the Burbank plant can be diverted/bypassed to the HTP during periods of emergency. Discharges from the Burbank plant are regulated under a separate NPDES permit, as well (LARWQCB and EPA 2005). The Hyperion Treatment System also can be referred to as the Hyperion Service Area (LARWQCB and EPA 2005).

comes from contract cities and agencies (LARWQCB and EPA 2005).[2] The HTP also accepts dry-weather runoff that is diverted from storm drains into the City's collection system from April 1 to October 31 (LARWQCB and EPA 2005). The Hyperion Treatment System consists of approximately 6,500 miles of sewer lines within the city and additional lines under control of contract cities and agencies (LARWQCB and EPA 2005). Sludge from the Tillman and Los Angeles-Glendale plants is returned to the wastewater collection system and flows to the HTP for treatment—these discharges are regulated under separate NPDES permits (LARWQCB and EPA 2005).

The HTP has a dry-weather average design treatment capacity of 450 million gallons per day (mgd) and a wet-weather peak hydraulic capacity of approximately 850 mgd.[3] The West Basin Municipal Water District (West Basin) operates the West Basin Water Recycling Facility (West Basin Facility) in El Segundo, California (LARWQCB and EPA 2005). As of 2005, West Basin was contractually obligated to receive up to 70 mgd of secondary effluent from the HTP for advanced treatment (LARWQCB and EPA 2005). The West Basin Facility provides tertiary treatment and/or advanced treatments such as microfiltration and reverse osmosis (RO) to the secondary effluent to provide Title 22 high purity recycled water (LARWQCB and EPA 2005). Title 22 recycled water is used for beneficial irrigation, industrial applications, and other purposes (LARWQCB and EPA 2005). The RO-treated recycled water is primarily injected into the West Coast Basin Barrier Project to control seawater intrusion (LARWQCB and EPA 2005). In 2003, the HTP received an average of 339 mgd of influent and discharged an average of 315 mgd of secondary effluent to the ocean (LARWQCB and EPA 2005). Approximately 24 mgd of secondary effluent was conveyed to the West Basin Water Recycling Facility for further treatment (LARWQCB and EPA 2005). In 2007, the West Basin Facility received about 35 mgd of secondary effluent from the HTP (K. Yamamoto, pers. comm. 2008). Brine from the West Basin facility is discharged through the HTP five-mile outfall, although it is regulated under a separate NPDES Permit and Waste Discharge Requirements (LARWQCB and EPA 2005).

[2] The Burbank Water Reclamation Plant is owned by the City of Burbank, and therefore is not technically part of the Hyperion Treatment System, which is owned by the City of Los Angeles. Under contract, sludge from the Burbank plant is returned to the City of Burbank sewer system for treatment at the HTP, and the influent to the Burbank plant can be diverted/bypassed to the HTP during periods of emergency. Discharges from the Burbank plant are regulated under a separate NPDES permit, as well (LARWQCB and EPA 2005). The Hyperion Treatment System also can be referred to as the Hyperion Service Area (LARWQCB and EPA 2005).

[3] In wet weather, increased flow results from infiltration and inflow of rainwater into the sewage system. Flow in excess of 850 mgd has been observed periodically. However, during the peak weather flows, Hyperion still provides full secondary treatment for an average maximum daily flow of 850 mgd.

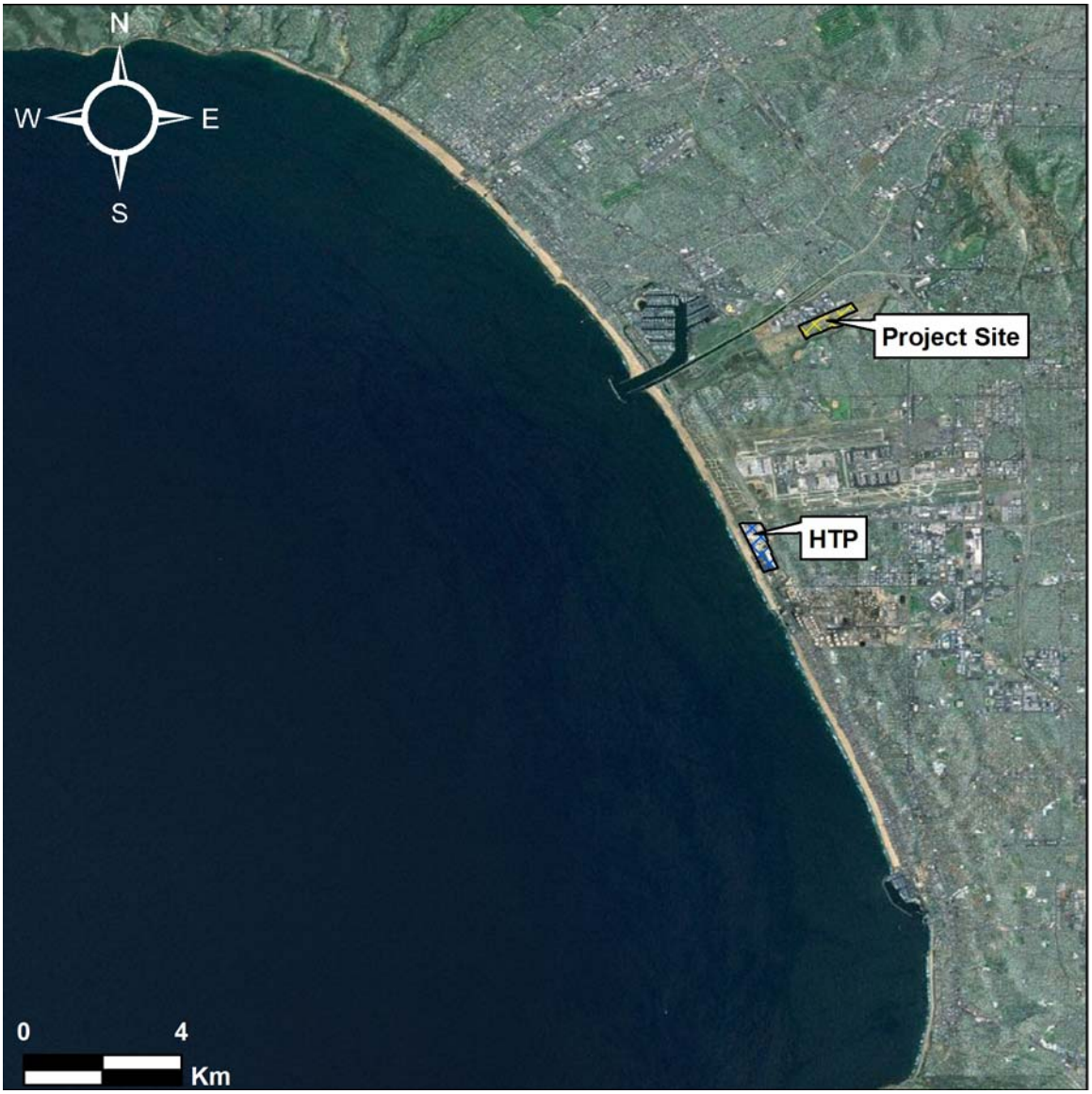

Figure 1. Location of the Hyperion Treatment Plant (HTP) in relation to the site of the Proposed Project.

2.1.1 Summary of Treatment Processes at Hyperion

The City of Los Angeles began discharging wastewater to marine waters at Hyperion in 1894. A primary sewage treatment plant and the existing one-mile outfall were constructed in 1950, while the five-mile and seven-mile outfalls were placed into operation in 1961 (Tetra Tech 1981). Since December 1998 the HTP has provided full secondary treatment (LARWQCB and EPA 2005). The secondary treatment process was augmented in calendar years 1999-2000 with additional high purity oxygen activated sludge

modules, secondary clarifiers, and egg-shaped digesters to achieve higher quality effluent. The HTP is now widely considered to be "a world-class treatment facility".[4]

Preliminary and primary treatment processes at the HTP consist of screening, grit removal, and primary sedimentation with coagulation and flocculation. During the secondary treatment process, the primary effluent is treated biologically in a high purity oxygen activated sludge process comprised of a cryogenic oxygen plant, nine secondary reactor modules and 36 secondary clarifiers (LARWQCB and EPA 2005). The reactor modules are oxygen-rich tanks where bacteria living in the wastewater consume most of the remaining organic particles (solids) (CLA-DPW 2008).

Each secondary reactor module is designed to handle 50 mgd of flow which results in a total treatment capacity of 450 mgd of primary effluent (LARWQCB and EPA 2005). After clarification, un-disinfected secondary effluent is discharged into Santa Monica Bay through the five-mile ocean outfall (LARWQCB and EPA 2005).

Grit and debris that are removed during the preliminary treatment processes are hauled away to landfills. The remaining solids fractions (primary sludge and skimmings, thickened waste activated sludge) are anaerobically digested onsite. The digested solids are screened and dewatered using centrifuges. Beginning on January 1, 2003, the HTP implemented full thermophilic digestion to generate Class A "EQ" biosolids. The biosolids are beneficially reused offsite for land application and composting projects (LARWQCB and EPA 2005).

2.1.2 Outfall Descriptions

There are three ocean outfalls at the HTP; however, only the one- and five-mile outfalls currently are used for wastewater discharge to Santa Monica Bay. Locations of the outfalls are depicted in Figure 2.

2.1.2.1 One-Mile Outfall (Discharge 001):

The HTP one-mile outfall is a 3.7-m (12-ft) diameter outfall terminating approximately 1.6 km (5,364 ft) west-southwest of the HTP at a depth of 15 m (50 ft) below the ocean surface. At the terminus of the outfall is a 300-foot long diffuser with 10 elliptical discharge ports (four bulkhead ports, six side ports), each 99 cm by 46 cm (39 inches by 18 inches). The one-mile outfall is not used for routine discharge of treated wastewater, but is permitted for the emergency discharge of chlorinated secondary effluent during extreme high flows, power failures, and preventive maintenance. However, during intense storms, or storms associated with plant power outages, direct discharge of un-disinfected storm water is also permitted at Discharge 001 (LARWQCB and EPA 2005). The City is required to notify the Regional Board and USEPA in advance of any planned preventive maintenance that results in discharges through the one-mile outfall.

In 2005, effluent was discharged twice through the one-mile outfall during heavy storm events on January 9, 2005 and January 10, 2005. These discharges were comparatively minor; for instance, the January 10,

[4] See e.g., Heal the Bay website, *accessible at* http://www.healthebay.org/aboutus/20years/top10.asp (last visited October 12, 2008).

2005 discharge consisted of 1,400 gallons, or 0.0004 percent of the average daily volume discharged through the 5-mile outfall in 2005. Emergency discharge during heavy storm events through the one-mile outfall has not occurred since these January 2005 events.

Since 2006, the one-mile outfall has been used five times—once in November 2006 during a thorough inspection of the five-mile outfall, and four times in 2007-08 during gate testing (M. Ruiz, pers. comm. 2008). During the 2006 inspection, the discharge volume through the one-mile outfall was 700 million gallons, or roughly twice the average daily volume discharged that year through the 5-mile outfall. Volumes were much lower during the 2007-08 gate tests, ranging between 1.26 million gallons and 4.627 million gallons (M. Ruiz, pers. comm. 2008). These volumes are 0.41 percent to 1.55 percent, respectively, of the average daily volume discharged that year through the 5-mile outfall.

2.1.2.2 Five-Mile Outfall (Discharge 002):

The HTP five-mile outfall is a 3.7-m (12-ft) diameter outfall terminating approximately 8.1 km (26,525 ft) west-southwest of the HTP at a depth of 57 m (187 ft) below the ocean surface. This outfall is located north of the one-mile outfall and ends in a "Y"-shaped diffuser consisting of two 1,219-m (4,000-ft) legs. Each diffuser leg has two different pipe sections, one 2.6 m (102 in.) in diameter and the other 1.8 m (72 in.) in diameter. Each leg of the diffuser has 83 ports that range from 17 cm (6.75 in.) to 21 cm (8.13 in.) in diameter. The variable diameter of the diffuser legs and ports are designed to achieve uniform flow conditions; however, there are likely slight variations in flow along the diffuser legs. This outfall is the only one at HTP permitted for the routine discharge of un-disinfected secondary treated effluent (LARWQCB and EPA 2005). Additional detail regarding this outfall, and the dilution achieved by discharge from this outfall, can be found in Section 4.0.

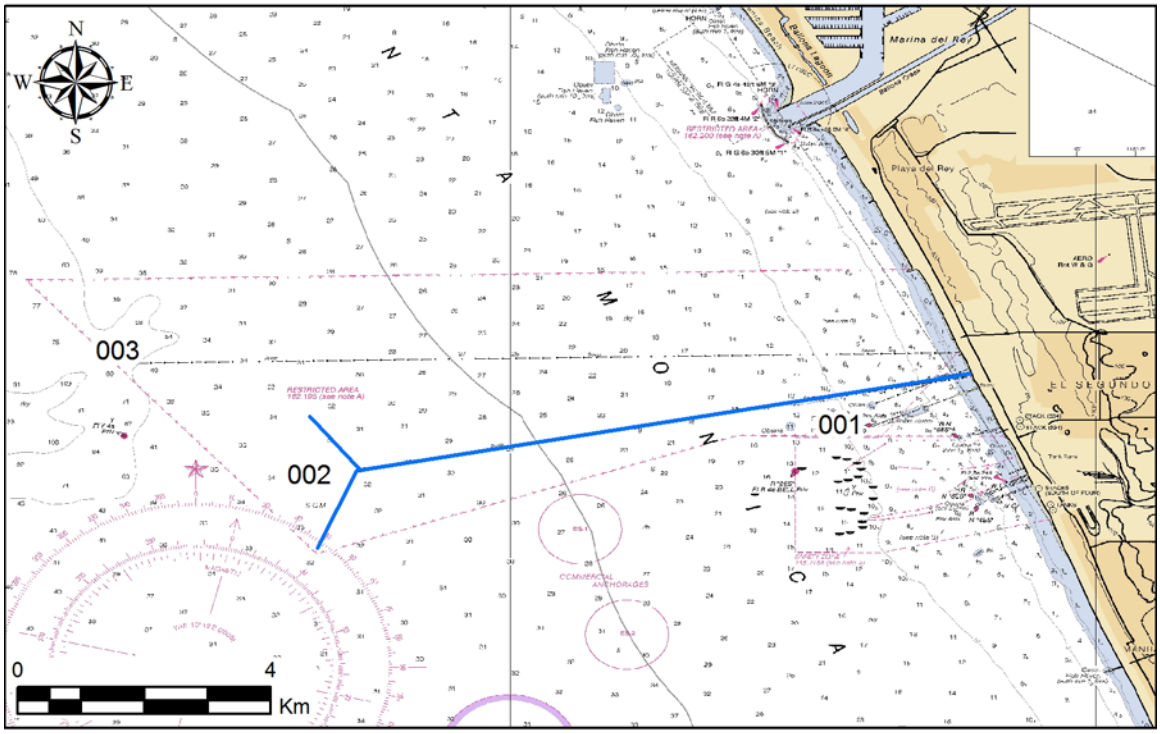

Figure 2. Location of the three Hyperion Treatment Plant (HTP) outfalls. The five-mile outfall (Serial No. 002) is shown in blue.

2.1.2.3 Seven-Mile Outfall (Discharge 003):

The HTP seven-mile outfall is a 50.8-cm (20-in.) diameter outfall terminating approximately 10.8 km (35,572 ft) west of the HTP at a depth of 91 m (300 ft) below the ocean surface at the head of Santa Monica Canyon. This outfall was used until 1987 to discharge sludge. Discharge 003 is removed from service and discharge of effluent from this location is prohibited (LARWQCB and EPA 2005).

2.2 WATER QUALITY LAWS AND REGULATIONS CONCERNING HTP'S TREATMENT AND DISCHARGE OF WASTEWATER

The wastewater discharges from HTP are subject to a variety of requirements established by State legislation related to water quality, numerous regulations implementing that legislation and specific limitations in discharge permits issued to the City. The California Water Code declares the broad policy of the State Legislature that the quality of all the waters of the State should be protected for use and enjoyment by the people of the State (California Water Code Section 13000.). One regulatory plan that implements that policy is the Basin Plan (or Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties) (Basin Plan). This Plan, which was initially adopted by the LARWQCB in 1975 and subsequently amended, was also approved by USEPA. The Basin Plan represents the LARWQCB's master planning document and regulations to implement the

policies set forth in the Water Code. The Basin Plan incorporates (by reference) applicable State and Regional Board plans and policies and other State-pertinent water quality policies and regulations. The Basin Plan:

- Designates beneficial uses for surface waters and ground waters,
- Sets narrative and numeric objectives to be attained or maintained to protect beneficial uses and conform to state and federal antidegradation policies, and
- Includes implementation provisions, programs and policies to protect all waters of the region.

To implement the policies set forth in the Water Code with respect to the water quality impacts attributable to point and non-point discharges into the Pacific Ocean, the State Water Resources Control Board (SWRCB) adopted the Water Quality Control Plan for the Ocean Waters of California (Ocean Plan) in 1972. The Ocean Plan states that "protection of the quality of the ocean waters for use and enjoyment by the people of the State requires control of the discharge of waste to ocean waters…" (SWRCB 2005). The Ocean Plan lists the beneficial uses of California's ocean waters which need to be protected and establishes water quality objectives necessary to achieve protection for those beneficial uses. The Ocean Plan also identifies specific areas where discharges are prohibited, and sets forth a program of implementation (including waste discharge limitations, monitoring, and enforcement) to ensure that water quality objectives are met. The SWRCB has established a triennial review process for the Ocean Plan in order "to guarantee that the current standards are adequate and are not allowing degradation to marine species or posing a threat to public health" (SWRCB 2005). The SWRCB is responsible for reviewing Ocean Plan water quality standards and for modifying and adopting standards in accordance with Section 303(c)(1) of the Clean Water Act and Section 13170.2 of the California Water Code. Pursuant to that process, the Ocean Plan has been amended on a number of occasions, most recently in 2005 by the State Water Resources Control Board, (amendments were approved by EPA in 2006).

An NPDES permit is required to authorize any facility to discharge flow and pollutants to a receiving water. The NPDES permit provides limitations on the discharge such that beneficial uses of the receiving water body are protected (EPA 1996). In California, NPDES permits are issued by the Regional Water Quality Control Board (RWQCB) for discharges to waters within each of nine (9) major regions. The HTP discharge occurs within the Los Angeles Region and is regulated by both the Los Angeles RWQCB and EPA (LARWQCB and EPA 2005).

The HTP NPDES permit also "implements the plans, policies, and provisions of the Basin Plan", and also includes "effluent and receiving water limitations, prohibitions, and provisions that implement the Ocean Plan" (LARWQCB and EPA 2005). Thus, water quality objectives and effluent limits in the HTP NPDES permit are based on:

- The plans, policies, and water quality standards in the Basin Plan,
- The Ocean Plan,

- EPA Guidance on implementation of toxicity programs,
- Applicable federal and state laws and regulations, and
- Best professional judgment of RWQCB Staff.

Specifically, the HTP NPDES permit lists the applicable laws, plans, policies, and regulations which are taken into account in the permit, including the federal Clean Water Act (CWA), the Basin Plan, the Ocean Plan, Beneficial Uses, Maintaining High Quality Water (an antidegradation policy document), Watershed Management, CWA 303(d) Listed Pollutants, and Santa Monica Bay Beaches Bacteria Total Maximum Daily Loads (NPDES Permit at 11.). The NPDES permit establishes effluent limitations that incorporate various CWA requirements designed to protect and enhance water quality. Section 402 of the CWA authorizes USEPA or States within an approved NPDES program to issue NPDES permits. These state and federal laws and policies are designed to ensure that a water body will not be degraded by permitted discharge, except under the conditions established in the State Antidegradation Policy and the federal regulation. The provisions of the HTP NPDES permit are consistent with the antidegradation policies. Also, the RWQCB has been implementing a Watershed Management Approach to address water quality protection in Los Angeles and Ventura Counties. The objective is to provide a comprehensive and integrated strategy resulting in water resource protection, enhancement and restoration, while balancing economic and environmental impacts within a hydrologically defined drainage basin or watershed. The Management Approach emphasizes cooperative relationships between regulatory agencies, the regulated community, environmental groups, and other stakeholders in the watershed to achieve the greatest environmental improvements with the resources available. Thus, the water quality objectives and effluent limitations in the HTP NPDES permit are based on plans, policies and water quality standards (beneficial uses + objectives + antidegradation policy) contained in the Water Quality Control Plan, the Basin Plan (as amended and approved by USEPA), the Ocean Plan, Region 9 & 10 Guidance for Implementing Whole Effluent Toxicity Programs, Final (May 31, 1996), Whole Effluent Toxicity Control Policy (USEPA, July 1994), the Federal CWA and associated regulations, and best professional judgment (pursuant to 40 CFR 122.44) (LARWQCB and EPA 2005).

In addition, the HTP NPDES permit also takes into account the Santa Monica Bay Restoration Plan, a multi-agency and stakeholder program developed as a blueprint for restoring and enhancing water quality in the Bay. In recognition of the importance of the Santa Monica Bay as a natural resource, the State of California and USEPA nominated the Bay for inclusion in the National Estuary Program, and Congress included the Bay in that program, leading to the formation of the Santa Monica Bay Restoration Project and the restoration plan. Leading priorities of Bay Restoration Plan are: reduction of pollutants of concern at the source; attainment of full secondary effluent treatment at HTP and realization of a mass emission approach to pollutant regulation.

The HTP NPDES permit includes a comprehensive Monitoring and Reporting Program with respect to the limitations and conditions in the permit. The Permit also incorporates standard provisions and monitoring and reporting requirements applicable to permittees, including a monitoring program that was developed jointly by the RWQCB and USEPA. Among other things, a discharger covered by the permit must comply with all conditions in the permit, and any instance of noncompliance is deemed to constitute a violation of the CWA and the California Water Code. Violators are subject to fines and other penalties

that may include permit termination, revocation and reissuance, modification or denial of a permit renewal.

2.2.1 HTP NPDES Permit Requirements and Origin of Those Permit Limits

For a major discharge, such as the discharge from the HTP, a variety of NPDES permit requirements are employed, including both effluent and receiving water limits and requirements for certain treatment processes (LARWQCB and EPA 2005). Effluent limitations are required for pollutants that are determined by the RWQCB to be discharged at a level that may cause or contribute to an excursion above a water quality standard (SWRCB 2005). The RWQCB conducts a statistical analysis using historical monitoring data to determine which pollutants in a discharge have the "reasonable potential" to cause or contribute to an exceedance of a water quality objective, and develops numeric effluent limitations for those pollutants based upon applicable water quality standards (SWRCB 2005). For constituents that have not been determined to have "reasonable potential," narrative statements are included in the NPDES permit requiring that the discharge comply with applicable water quality requirements (in the case of the HTP, California Ocean Plan requirements) (LARWQCB and EPA 2005).

For NPDES regulatory purposes, pollutants discharged from the HTP are grouped into three general categories: conventional, toxic, and non-conventional pollutants (LARWQCB and EPA 2005, F-21). Numerical effluent limitations for all three categories of pollutants are set based on specifications in the Ocean Plan (SWRCB 2005) (effluent limitations in Table A and water quality objectives in Table B) and secondary treatment standards outlined in 40 CFR 133 §102. The discharge requirements set forth in the HTP NPDES Permit consist of the following:

- Limitations on the types of materials to be discharged from each outfall,
- Effluent limitations and performance goals for each outfall,
- Mass emissions caps, and
- Receiving water limitations

HTP effluent limits for the conventional pollutants Biochemical Oxygen Demand ($BOD_5 20^oC$) and total suspended solids (Table 1) are set according to secondary treatment standards outlined in 40 CFR 133 §102. Effluent limits for the conventional pollutants oil and grease, settleable solids, and turbidity (Table 1) are set according to Table A ("Effluent Limitations") of the Ocean Plan. These limits for conventional parameters apply only to publicly-owned treatment works (POTWs) and are not subject to a dilution credit. In other words, these limitations for conventional parameters apply to the end-of-pipe discharged concentration, regardless of the fact that effluent is discharged to the Pacific Ocean and is subject to dilution upon discharge.

Table 1. HTP effluent limits for conventional pollutants.

Constituent	Units	DISCHARGE LIMITATIONS [1]		
		Monthly Average	Weekly Average	Daily Maximum [2]
$BOD_5 20^0C$ [3]	mg/L	30	45	[4]
	lbs/day	113,000	169,000	---
Suspended solids [3]	mg/L	30	45	[4]
	lbs/day	113,000	169,000	---
Oil and grease [5]	mg/L	25	40	75
	lbs/day	93,800	150,000	---
Settleable solids [5]	ml/L	1.0	1.5	3.0
Turbidity [5]	NTU	75	100	225

[1] The mass emission rates for Discharge Serial No. 002 are based on the average design flow rate (420 mgd) of the Hyperion Treatment Plant in the 1994 permit.

During storm events when flow exceeds the design capacity, the mass emission rate limits shall not apply. Only the concentration limits shall apply.

[2] The daily maximum effluent concentration limit shall apply to flow-weighted 24-hour composite samples. It may apply to grab samples if the collection of composite samples for those constituents is not appropriate because of the instability of the constituents.

[3] Limits are based on secondary treatment standards, 40 CFR 133.102.

[4] Daily maximum limits are not specified for secondary treatment standards in 40 CFR 133.102.

[5] Limits are based on Ocean Plan effluent limitations, Table A.

Source: LARWQCB and EPA (2005)

HTP effluent limits for non-conventional and toxic pollutants are calculated according to Equation (1), which makes use of water quality objectives from Table B ("Water Quality Objectives") of the Ocean Plan, and accounts for initial dilution of the HTP wastewater plume[5] immediately after discharge and background seawater concentration of pollutants.

Equation (1)[6] $Ce = Co + Dm(Co - Cs)$

where:

[5] The HTP wastewater plume is the trail or cloud of wastewater that issues from the outfall, becoming more diffuse and diluted as it mixes with the ocean water in the Bay.
[6] SWRCB 2005

Ce = the effluent concentration limit (μg/l)

Co = the concentration (water quality objectives in Table B of the Ocean Plan) to be met at the completion of initial dilution (μg/l)

Cs = the background seawater concentration (μg/l), from Table C of the Ocean Plan

Dm = minimum probable initial dilution expressed as parts seawater per part wastewater.

By this procedure, the HTP discharge is required to meet the water quality objectives set forth in Table B of the Ocean Plan (reproduced in Table 2), not at the point of discharge but at a point after the discharge has been initially diluted by ocean water. The Los Angeles RWQCB has set the allowable initial dilution (Dm in Equation (1)) at 84 parts seawater to 1 part effluent (i.e., a dilution ratio of 84:1) for the five-mile outfall and a dilution ratio of 13:1 for the one-mile outfall (LARWQCB and EPA 2005, F-22). These allowable initial dilution ratios are often referred to as "dilution credits," and the volume enclosed by the boundary at which the water quality objectives of Table B of the Ocean Plan must be met is often referred to as the "Zone of Initial Dilution". The dilution credits were calculated by the California State Water Resources Control Board (State Board), and are based on an estimate of the zone in which momentum and buoyancy mixing associated with the diffuser occurs.

The HTP NPDES permit contains effluent limitations for Outfall No. 002 (the five-mile outfall)[7] for the constituents in the following constituent categories:

- Marine aquatic life toxicants (acute toxicity, chronic toxicity, radioactivity)
- Human health toxicants – non-carcinogens (tributyltin)
- Human health toxicants – carcinogens (chlordane, DDT, PAHs, PCBs, and TCDD (dioxin) equivalents)

Finally, the NPDES permit also contains performance goals for 72 additional constituents found in Table B of the Ocean Plan (Table 2). Performance goals are more stringent than the effluent limitations based upon Ocean Plan objectives and are established consistent with the State's antidegradation policy. Performance goals require maintenance of existing treatment levels and effluent quality and are based upon the actual performance of the HTP. The purpose of performance goals is to maintain existing treatment levels and effluent quality for ocean POTW discharges. The reason performance goals are assigned for ocean discharges and not inland discharges is that without water quality goals tied to actual POTW performance the significant dilution credits allowed by the Ocean Plan might inadvertently permit a POTW to reduce its treatment level while still meeting effluent limitations set by the Ocean Plan. Performance goals are not considered limitations or standards for the regulation of discharge from a POTW, and as such violations of performance goals are not subject to enforcement action in the same way violations of effluent limitations are enforced. The Executive Officer of the RWQCB and USEPA may modify any of the performance goals if the POTW requests and has demonstrated that the change is warranted (LARWQCB and EPA 2005, p. 22).

[7] The NPDES permit also regulates discharge from the one-mile outfall. Refer to Section 2.1.2.1

Table 2. Ocean Plan Water Quality Objectives (Table B).

TABLE B
WATER QUALITY OBJECTIVES

	Units of Measurement	Limiting Concentrations: 6-Month Median	Daily Maximum	Instantaneous Maximum
OBJECTIVES FOR PROTECTION OF MARINE AQUATIC LIFE				
Arsenic	ug/l	8.	32.	80.
Cadmium	ug/l	1.	4.	10.
Chromium (Hexavalent) (see below, a)	ug/l	2.	8.	20.
Copper	ug/l	3.	12.	30.
Lead	ug/l	2.	8.	20.
Mercury	ug/l	0.04	0.16	0.4
Nickel	ug/l	5.	20.	50.
Selenium	ug/l	15.	60.	150.
Silver	ug/l	0.7	2.8	7.
Zinc	ug/l	20.	80.	200.
Cyanide (see below, b)	ug/l	1.	4.	10.
Total Chlorine Residual (For intermittent chlorine sources see below, c)	ug/l	2.	8.	60.
Ammonia (expressed as nitrogen)	ug/l	600.	2400.	6000.
Acute* Toxicity	TUa	N/A	0.3	N/A
Chronic* Toxicity	TUc	N/A	1.	N/A
Phenolic Compounds (non-chlorinated)	ug/l	30.	120.	300.
Chlorinated Phenolics	ug/l	1.	4.	10.
Endosulfan	ug/l	0.009	0.018	0.027
Endrin	ug/l	0.002	0.004	0.006
HCH*	ug/l	0.004	0.008	0.012
Radioactivity	Not to exceed limits specified in Title 17, Division 1, Chapter 5, Subchapter 4, Group 3, Article 3, Section 30253 of the California Code of Regulations. Reference to Section 30253 is prospective, including future changes to any incorporated provisions of federal law, as the changes take effect.			

Table 2 (continued). Ocean Plan Water Quality Objectives (Table B).

Table B Continued

Chemical	30-day Average (ug/l) Decimal Notation	Scientific Notation
OBJECTIVES FOR PROTECTION OF HUMAN HEALTH – NONCARCINOGENS		
acrolein	220.	2.2×10^{2}
antimony	1,200.	1.2×10^{3}
bis(2-chloroethoxy) methane	4.4	4.4×10^{0}
bis(2-chloroisopropyl) ether	1,200.	1.2×10^{3}
chlorobenzene	570.	5.7×10^{2}
chromium (III)	190,000.	1.9×10^{5}
di-n-butyl phthalate	3,500.	3.5×10^{3}
dichlorobenzenes*	5,100.	5.1×10^{3}
diethyl phthalate	33,000.	3.3×10^{4}
dimethyl phthalate	820,000.	8.2×10^{5}
4,6-dinitro-2-methylphenol	220.	2.2×10^{2}
2,4-dinitrophenol	4.0	4.0×10^{0}
ethylbenzene	4,100.	4.1×10^{3}
fluoranthene	15.	1.5×10^{1}
hexachlorocyclopentadiene	58.	5.8×10^{1}
nitrobenzene	4.9	4.9×10^{0}
thallium	2.	$2. \times 10^{0}$
toluene	85,000.	8.5×10^{4}
tributyltin	0.0014	1.4×10^{-3}
1,1,1-trichloroethane	540,000.	5.4×10^{5}
OBJECTIVES FOR PROTECTION OF HUMAN HEALTH – CARCINOGENS		
acrylonitrile	0.10	1.0×10^{-1}
aldrin	0.000022	2.2×10^{-5}
benzene	5.9	5.9×10^{0}
benzidine	0.000069	6.9×10^{-5}
beryllium	0.033	3.3×10^{-2}
bis(2-chloroethyl) ether	0.045	4.5×10^{-2}
bis(2-ethylhexyl) phthalate	3.5	3.5×10^{0}
carbon tetrachloride	0.90	9.0×10^{-1}
chlordane*	0.000023	2.3×10^{-5}
chlorodibromomethane	8.6	8.6×10^{0}

Table 2 (continued). Ocean Plan Water Quality Objectives (Table B).

Table B Continued

	30-day Average (ug/l)	
Chemical	Decimal Notation	Scientific Notation
OBJECTIVES FOR PROTECTION OF HUMAN HEALTH – CARCINOGENS		
chloroform	130.	1.3×10^{2}
DDT*	0.00017	1.7×10^{-4}
1,4-dichlorobenzene	18.	1.8×10^{1}
3,3'-dichlorobenzidine	0.0081	8.1×10^{-3}
1,2-dichloroethane	28.	2.8×10^{1}
1,1-dichloroethylene	0.9	9×10^{-1}
dichlorobromomethane	6.2	6.2×10^{0}
dichloromethane	450.	4.5×10^{2}
1,3-dichloropropene	8.9	8.9×10^{0}
dieldrin	0.00004	4.0×10^{-5}
2,4-dinitrotoluene	2.6	2.6×10^{0}
1,2-diphenylhydrazine	0.16	1.6×10^{-1}
halomethanes*	130.	1.3×10^{2}
heptachlor	0.00005	5×10^{-5}
heptachlor epoxide	0.00002	2×10^{-5}
hexachlorobenzene	0.00021	2.1×10^{-4}
hexachlorobutadiene	14.	1.4×10^{1}
hexachloroethane	2.5	2.5×10^{0}
isophorone	730.	7.3×10^{2}
N-nitrosodimethylamine	7.3	7.3×10^{0}
N-nitrosodi-N-propylamine	0.38	3.8×10^{-1}
N-nitrosodiphenylamine	2.5	2.5×10^{0}
PAHs*	0.0088	8.8×10^{-3}
PCBs*	0.000019	1.9×10^{-5}
TCDD equivalents*	0.0000000039	3.9×10^{-9}
1,1,2,2-tetrachloroethane	2.3	2.3×10^{0}
tetrachloroethylene	2.0	2.0×10^{0}
toxaphene	0.00021	2.1×10^{-4}
trichloroethylene	27.	2.7×10^{1}
1,1,2-trichloroethane	9.4	9.4×10^{0}
2,4,6-trichlorophenol	0.29	2.9×10^{-1}
vinyl chloride	36.	3.6×10^{1}

Table 2 (continued). Ocean Plan Water Quality Objectives (Table B).

Table B Notes:

a) Dischargers may at their option meet this objective as a total chromium objective.

b) If a discharger can demonstrate to the satisfaction of the Regional Board (subject to EPA approval) that an analytical method is available to reliably distinguish between strongly and weakly complexed cyanide, effluent limitations for cyanide may be met by the combined measurement of free cyanide, simple alkali metal cyanides, and weakly complexed organometallic cyanide complexes. In order for the analytical method to be acceptable, the recovery of free cyanide from metal complexes must be comparable to that achieved by the approved method in 40 CFR PART 136, as revised May 14, 1999.

c) Water quality objectives for total chlorine residual applying to intermittent discharges not exceeding two hours, shall be determined through the use of the following equation:

$\log y = -0.43 (\log x) + 1.8$

where: y = the water quality objective (in ug/l) to apply when chlorine is being discharged;
x = the duration of uninterrupted chlorine discharge in minutes.

Source: Ocean Plan (SWRCB 2005).
Note: '*' indicates a term defined in the Ocean Plan.

The Effluent Limitations presented in Table A and the Water Quality Objectives of Table B of the Ocean Plan are set by the State Board and the USEPA in order "to ensure the reasonable protection of beneficial uses and the prevention of nuisance" (SWRCB 2005). The beneficial uses of water bodies in the nearshore and offshore zones of Santa Monica Bay that the HTP effluent limitations aim to protect are listed in Table 3, based on information from the Los Angeles Region's Basin Plan (LARWQCB 1994).

Table 3. Nearshore and offshore beneficial uses of Santa Monica Bay.

Beneficial Use	Explanation
IND	Industrial Service Supply: Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
NAV	Navigation: Uses of water for shipping, travel, or other transportation by private, military, or commercial vessels.
REC1	Water Contact Recreation: Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.
REC2	Non-contact Water Recreation: Uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
COMM	Commercial and Sport Fishing: Use of water for commercial or recreational collection of fish, shellfish, or other organisms including, but not limited to, uses involving organisms intended for human consumption or bait purposes.
EST	Estuarine Habitat: Uses of water that support estuarine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).
MAR	Marine Habitat: Uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).
WILD	Wildlife Habitat: Uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
RARE	Rare, Threatened, or Endangered Species: Uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal laws as rare, threatened, or endangered.
MIGR	Migration of Aquatic Organisms: Uses of water that support habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.
SPWN	Spawning, Reproduction, and/or Early Development: Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.
SHELL	Shellfish Harvesting: Uses of water that support habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sports purposes.
WET	Wetland Habitat: Uses of water that support wetland ecosystems, including, but not limited to, preservation or enhancement of wetland habitats, vegetation, fish, shellfish, or wildlife, and other unique wetland functions which enhance water quality, such as providing flood and erosion control, stream bank stabilization, and filtration and purification of naturally occurring contaminants.

Source: LARWQCB (1994), Table 2-3, Section 2.

Note: The Santa Monica Bay area is broken down into smaller nearshore units in the Basin Plan (e.g., beaches, harbors, lagoons). Not every beneficial use listed in Table 1 is associated with every unit within the Santa Monica Bay area, though each beneficial use of Table 1 is associated with at least one unit.

2.2.2 Public Process and Action

To receive an NPDES permit, the discharger must complete and submit for review the appropriate application forms to the applicable RWQCB. This information is reviewed by the RWQCB or the SWRCB for completeness, and additional information may be required. Staff determines if the discharge is to be permitted or prohibited, and if a permit is needed and the application is complete, a draft permit is prepared and a notice is posted for a 30-day public comment period on the draft permit. The discharger must publish the public notice for one day in the largest circulated paper in the municipality or county and submit proof of posting or publication to the regional board within 15 days after posting or publication. The RWQCB then holds a public hearing after the 30-day public notification. The SWRCB or RWQCB may adopt the permit as proposed or with modification, or not adopt it at all. A majority vote of the Water Board members is required to adopt the permit. The EPA has 30 days to object to the draft permit, and the objection must be satisfied before the permit becomes effective (SWRCB 2008).

The Hyperion NPDES permit is jointly issued by the Regional Board and USEPA because the discharged effluent enters federal waters. The Regional Board follows EPA's procedures in issuing the permit. Pursuant to 40 CFR 122.46, the duration of a NPDES permit shall not exceed 5 years. A public notice of the consideration of the NPDES permit was issued on September 21, 2004. Prior to that time, in connection with that review of the NPDES permit, the City of Los Angeles submitted a report in 2003 that determined "no unreasonable degradation of the marine environment is occurring with the current discharge receiving full secondary treatment" (LARWQCB and EPA 2005). The tentative Hyperion permit was heard before a joint hearing panel of the Regional Board and EPA on November 4, 2004. Written comments were submitted by the City of Los Angeles, Los Angeles County Sanitation Districts, Heal the Bay, and Santa Monica Baykeeper. The tentative permit was then revised based on written comments and testimony received during the November Board hearing. The final permit was adopted on April 7, 2005 at the Regional Board Meeting. It was then issued on April 11, 2005 by EPA. The NPDES permit became effective on May 14, 2005, 33 days (3 days for mailing) after the issuance of the NPDES permit.

The California Water Code and federal regulations governing NPDES permits provide that an aggrieved person may file a petition seeking review of an approved NPDES permit (to the State Board or federal Environmental Appeals Board, as applicable) (Water Code § 13320; 40 CFR 124). However, no such petition or any other appeal or legal challenge was filed regarding the Hyperion permit (R4-2005-0020).

2.2.3 Analysis of Effluent Plume Associated With Discharge From Five-Mile Outfall and Limitations Under NPDES Permit

An outfall diffuser is designed to achieve greater mixing of discharged effluent with receiving water than would occur if effluent were discharged through an open pipe or over a short distance. A diffuser is designed using the characteristics of both the effluent and the receiving water to achieve rapid mixing of the effluent with the receiving water.

As described in City of Los Angeles (1973), a "very extensive research and investigational program" was conducted to establish the design requirements for the HTP five-mile outfall. Much of the research

focused on predicting coliform concentrations that would be expected at shoreline beach stations, as coliform concentration requirements were more stringent than requirements for other water quality constituents. The design study was used to compute the distance from the shoreline at which the diffuser should be located (five miles) and the characteristics of the outfall diffuser itself. As summarized in City of Los Angeles (1973), "the Hyperion engineers established that a diffuser would be developed to provide an initial dilution of at least 100 under the action of 0.2 knot current. This requirement became therefore part of the basic criteria for the length of the outfall." As described above, the SWRCB subsequently assigned a dilution ratio of 84:1 to the five-mile outfall (LARWQCB 2005 and EPA, F-22).

In the case of the HTP, the five-mile diffuser was designed to discharge in the cold ocean water below the thermocline—i.e., below the layer separating cooler waters at depth in the ocean from warmer waters above. A thermocline is present in the offshore zone of Santa Monica Bay during most seasons of the year, and the thermocline inhibits mixing between deeper and surface waters of the ocean. The five-mile outfall was designed so that effluent discharged from the diffuser would be "trapped" below the thermocline and would not mix upward into the ocean surface waters, where the effluent could be transported to the nearshore environment.

Kolpack (1979) determined the HTP wastewater plume rose rapidly to about 20 m below the sea surface, and that wave action in the water column tended to disperse the plume over a large part of the Santa Monica shelf. The dominant direction of initial transport during most of the year was southeast.

Data collected as part of physical monitoring programs specified in the HTP's NPDES permit have been used to locate and define the geometry of the wastewater plume discharged from the five-mile outfall. Monitoring data confirm that the HTP outfall diffuser performs in the designed manner, as confirmed by the LARWQCB in its findings in the HTP NPDES permit fact sheet:

> The City has collected and assessed extensive chemical and physical data from Santa Monica Bay, including (since 1987) over 6 years of weekly water quality assessments, approximately 4 years of monthly assessments, and approximately 4 years of quarterly assessments. Data collection has taken place at 36 sites (12 nearshore stations and 24 offshore stations) throughout Santa Monica Bay during all weather conditions, including El Niño, La Niña and winter storm conditions. The parameters collected in these assessments are used to locate and define the geometry of the wastewater plume and include transmissivity, dissolved oxygen, temperature and salinity.
>
> The movement of the plume is dictated by the depth of the thermocline or stratification and the direction and strength of highly variable Santa Monica Bay currents. Under typical conditions, the plume is detected within 2 km (6,562 feet) of the outfall terminus, although it has been detected as far as 8 km (26,247 feet) away from the outfall. Also, the plume has almost always been detected below the thermocline at a depth ranging from 10 m (33 feet) to 55 m (180 feet). Infrequently, during winter storm conditions, the plume has been detected at the surface in the vicinity of the outfall. On rare occasions, it has been impossible to detect the plume.
>
> As the waters of Santa Monica Bay approach the shore, the thermocline intersects the rising sea bottom. This point is typically 1000 m (3281 feet) or more offshore and is the theoretical limit of the approach of the plume to the shoreline. The plume has never been detected less than 2.5 km (8202 feet) from shore, at the 45 m (148 feet) depth contour.

> The City has conducted shoreline and nearshore/inshore water quality monitoring in Santa Monica Bay since the late 1940s. The monitoring results indicated that effluent from Hyperion's five-mile outfall does not reach the shoreline and that elevated bacterial counts are associated with runoff from storm drains and discharges from piers. The direct impacts of the discharge from Hyperion's one-mile outfall on shoreline water quality have not been studied due to the lack of routine discharge. However, it is expected to be very minimal in that effluent discharged from the one-mile outfall is disinfected, and the volume of the discharge is usually much less than five million gallons occurring at most quarterly.

The size and extent of the effluent plume from the HTP five-mile outfall is dependent on several factors. Although the plume has been detected as far as 8 km from the five-mile outfall terminus and farther out in the Bay, the plume has never been detected within 2.5 km from the shoreline. This is due to several factors, including the design of the diffusers, the distance from shore, prevailing currents, oceanographic parameters (including density stratification), and discharge from the five-mile outfall is released into the denser, deeper layer of water. Normally, the plume is submerged and held at an average depth of approximately 30 m (98 ft) by density stratification in the waters of the Bay (CLA-EMD 2007a). During quarterly surveys in 2005 and 2006, the plume was detected at depths between 20 and 60 m (66 and 197 ft).

The physical characteristics of the HTP effluent that is discharged through the five-mile outfall are analyzed on a regular basis by the City and reported to the Los Angeles RWQCB. Frequency of monitoring varies by constituent. Most analyses are performed on composite samples (collected over a 24-hour period), while others are performed on grab samples. Data presented in Table 4 are from sampling in 2005 and 2006. Results from 2005 are reported prior to and following the effective date of the HTP's latest NPDES permit on May 14, 2005. In many cases, analytes were either not present or present below the detection limits of the analytical technique (denoted as ND for 'Not Detected'). In some cases, analytes were detected but were below the Practical Quantitation Level or Minimum Level; in these instances, results are reported as 'Detected Not Quantified' (DNQ) (CLA-EMD 2007a). During all three analysis periods detailed in Table 4, average concentrations were well below established NPDES permit limits for those constituents with specified limits. Concentrations of effluent after a minimum initial dilution of 84:1 were calculated and compared with water quality objectives specified in the Ocean Plan (Table 5). In all cases, calculated concentrations were well below established objectives.

Table 4. Average concentrations of conventional constituents and other pollutants in the HTP five-mile outfall effluent, and NPDES permit limits. Source: CLA-EMD (2007a).

Constituent	Units	Previous NPDES Permit Limits[1]	Current NPDES Permit Limits[1]	Average Concentration in Five-Mile Effluent		
				Jan. 1-May 13, 2005	May 14–Dec. 31, 2005	Jan. 1-Dec. 31, 2006
T.S.S.	mg/l	30	30	18	23	22
BOD	mg/l	30	30	17	21	20
Oil & grease	mg/l	25	25	ND	ND	ND
Settleable solids	mg/l	1.0	1.0	0.24	ND	ND
TOC	mg/l			18.4	20.5	22.2
Phosphorus	mg/l			2.5	2.93	3.10
Ammonia-N	mg/l	51		34.2	35.6	36.5
Organic N	mg/l			3.7	4.1	4.1
Nitrate-N	mg/l			0.03	0.02	ND
Turbidity	NTU	75	75	9	10	11
pH		6.0-9.0	6.0-9.0	6.9	6.8	6.9
Metals / Inorganics						
Antimony	µg/l			1.33	1.43	DNQ
Arsenic	µg/l	12		2.68	2.2	2.0
Beryllium	µg/l	2.8		ND	ND	ND
Cadmium	µg/l	21		ND	ND	ND
Chromium (hex)	µg/l	113		ND	ND	ND
Chromium (total)	µg/l			DNQ	DNQ	DNQ
Copper	µg/l	87		DNQ	18	18
Lead	µg/l	101		DNQ	ND	DNQ
Mercury	µg/l	1.1		ND	ND	DNQ
Nickel	µg/l	113		DNQ	DNQ	DNQ
Selenium	µg/l	1275		DNQ	1	DNQ
Silver	µg/l	26		1.34	1.46	1.10
Thallium	µg/l	1190		1.29	DNQ	DNQ
Zinc	µg/l	346		DNQ	21	21
Tributyltin	µg/l	119	120	6.2	ND	ND
Cyanide	µg/l	85		ND	ND	ND
DDT + derivatives	ng/l	14	14	ND	0	0
PCBs	µg/l	0.002	0.002	ND	0	0
PAHs	µg/l	0.748	0.748	ND	0	0

1 = *Based on monthly averages except TSS, BOD, Oil & grease, and settleable solids (30-d average).*

DNQ = *Detected but not quantified*

ND = *Not detected.*

Table 5. Minimum, average, and maximum concentrations of conventional constituents and other pollutants in the HTP five-mile outfall effluent after initial dilution, and California Ocean Plan objectives. Source: CLA-EMD (2007a).

			Concentration After Initial Dilution[1]								
			Jan.-May 05			**May-Dec. 05**			**Jan.-Dec. 06**		
Constituent	**Units**	**Ocean Plan Obj.[2]**	**Min.**	**Avg.**	**Max.**	**Min.**	**Avg.**	**Max.**	**Min.**	**Avg.**	**Max.**
TOC	mg/l		0.17	0.22	0.25	0.21	0.24	0.27	0.19	0.26	0.33
Phosphorus	mg/l		0.025	0.030	0.036	0.030	0.034	0.040	0.031	0.036	0.042
Ammonia-N	mg/l	0.6	0.33	0.40	0.46	0.40	0.42	0.44	0.41	0.43	0.46
Organic N	mg/l		0.04	0.044	0.048	0.047	0.048	0.048	0.034	0.048	0.068
Nitrate-N	mg/l		0.00024	0.00035	0.00047	0.0002	0.0002	0.0002	ND	ND	ND
Metals / Inorganics											
Antimony	µg/l	1200	0.0094	0.016	0.022	0.016	0.017	0.018	DNQ	DNQ	0.01
Arsenic	µg/l	8	DNQ	0.032	0.041	0.018	0.026	0.041	DNQ	0.02	0.04
Beryllium	µg/l	0.033	ND	ND	ND	ND	ND	ND	ND	ND	DNQ
Cadmium	µg/l	1	ND	ND	ND	ND	DNQ	ND	ND	ND	DNQ
Chromium (hex)	µg/l	2	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium (total)	µg/l	190000	DNQ	DNQ	DNQ	DNQ	DNQ	DNQ	DNQ	DNQ	DNQ
Copper	µg/l	3	DNQ	DNQ	DNQ	DNQ	0.21	0.26	0.19	0.21	0.26
Lead	µg/l	2	ND	DNQ	DNQ	ND	ND	DNQ	ND	DNQ	DNQ
Mercury	µg/l		ND	ND	ND	ND	ND	DNQ	ND	DNQ	DNQ
Nickel	µg/l	5	0.06	DNQ	0.16	DNQ	DNQ	0.094	DNQ	DNQ	DNQ
Selenium	µg/l	15	DNQ	DNQ	0.031	DNQ	0.012	0.014	DNQ	DNQ	0.02
Silver	µg/l	0.7	0.009	0.016	0.022	0.009	0.017	0.026	DNQ	0.01	0.02
Thallium	µg/l	2	0.008	0.015	0.022	DNQ	DNQ	0.024	DNQ	DNQ	DNQ
Zinc	µg/l	20	DNQ	DNQ	DNQ	DNQ	0.25	0.34	DNQ	0.25	0.31
Tributyltin	µg/l	1.4	ND	0.073	0.145	ND	ND	ND	ND	ND	0.11
Cyanide	µg/l	1	ND	ND	DNQ	ND	ND	0.06	ND	ND	ND
DDT + derivatives	ng/l	0.17	ND	ND	ND	0	0	0	0	0	0
PCBs	ng/l	0.019	ND	ND	ND	0	0	0	0	0	0
PAHs	ng/l	8.8	ND	ND	ND	0	0	0	0	0	0

1 = *Calculated based on a minimum initial dilution of 84 parts seawater to 1 part effluent.*

2 = *Oil & grease and settleable solids based on 30-d average concentration. All others based on 30-d average or 6-mo. median.*

DNQ = *Detected but not quantified*

ND = *Not detected.*

2.2.4 Emerging Contaminants

As defined by the U.S. Geological Survey (USGS) Toxics Program, "emerging contaminants are synthetic or naturally occurring chemicals or microorganisms that are not commonly monitored in the environment, but have the potential to enter the environment and cause known or suspected ecological and/or human health effects. In some cases, release of emerging chemical or microbial contaminants to the environment has likely occurred for a long time, but may not have been recognized until new detection methods were developed. In other cases, synthesis of new chemicals or changes in use and disposal of existing chemicals can create new sources of emerging contaminants."

Emerging contaminants include endocrine disrupters (which interfere with the production, distribution or function of hormones), synthetic industrial products or byproducts, pharmaceuticals and personal care products, and new pesticides (i.e., legacy pesticides inducing previously unreported effects) (SCCWRP 2007). Endocrine disrupter compounds (EDCs) may be found in many products, including pharmaceuticals, synthetic or naturally occurring hormones, plasticizers, personal care products, pesticides, and fire retardants. While many emerging contaminants are effectively removed by secondary wastewater treatment (e.g., Ibuprofen, a common pharmaceutical), some are not (e.g., DEET, a common insecticide).

California has a statewide Groundwater Ambient Monitoring and Assessment program that monitors for some emerging contaminants, including methyl tertiary butyl ether (MTBE), solvents, and perchlorate. In addition, monitoring of some emerging contaminants (those on the unregulated contaminants list) is required by the California Department of Public Health. Monitoring of these compounds is required by the LARWQCB by a few wastewater treatment facilities and for direct injection projects (Smith 2008), but monitoring is not widespread or routine.

As reported by Smith (2008), two studies are currently being conducted by the LARWQCB on EDCs. The first study will attempt to identify potential EDCs present in surface waters where endocrine disrupting effects are being observed in fish (i.e., near POTW outfalls), and will attempt to identify EDCs that may accumulate in sediment and fish tissue. The second study is intended to measure and compare the impacts of EDCs in fish from various habitats and locations in the Southern California Bight, and to identify chemicals causing impacts. The HTP undertook a preliminary study called "Documentation Of Human-derived Sex Steroid Hormones in Southern California Bight Flatfish" to evaluate potential impacts of hormones on fish near the HTP outfall. This study is ongoing.

Little is currently known about the extent and effect of these contaminants in Southern California. No chronic or acute toxicity studies of such contaminants are available, and there are no regulatory standards for such contaminants. However, investigators in other parts of the country have observed EDCs and their possible effects in water systems, and such contaminants are present in southern California (SCCWRP 2007). Effects observed in other parts of the country include evidence of "feminization" in male fish, possibly due to exposure to endocrine disrupters. However, the causal link with EDCs is not yet scientifically established, and even if it were it would be unclear which EDCs were responsible for such effects (SCCWRP 2007). A collaborative study involving SCCWRP, three state universities, four POTWs, one non-governmental organization, and the SWRCB is underway with the purpose of beginning to answer the many outstanding questions pertaining to important emerging contaminants. Data collected in these studies is expected to answer questions regarding ambient concentrations of emerging contaminants, including hormones, chemicals in industrial and commercial uses, current use pesticides, pharmaceuticals and personal care products, and chlorinated pesticides and PCBs, in the Southern California Bight. Data are also expected to be used to examine endocrine disruption and sources, fates, and effects in flatfish, gene expression changes and vitellogenin expression in hornyhead turbot, and organism and population level responses to compounds present in southern California coastal waters. Results of these studies are expected in 2009 (Steve Bay, personal communication, November 11, 2008).

Scientific studies of any potential impacts of emerging contaminants are in their early stages. Because this scientific work is in its infancy, currently, no thresholds, limits, or guidance exist from US EPA or other agencies regarding discharges of emerging contaminants or the potential environmental impacts of those discharges. Nonetheless, the City of Los Angeles and other jurisdictions are working to limit the release of emerging contaminants by the public into the water treatment system by participating in public education and outreach efforts through projects such as "No Drugs Down The Drain"[8] to reduce the quantity of pharmaceutical products and other contaminants dumped into the sewer system.

[8] See: http://www.nodrugsdownthedrain.org for more detail.

3.0 DESCRIPTION OF SANTA MONICA BAY

The following section includes descriptions of the physical environment and biological communities of Santa Monica Bay, including an overview of some of the local and regional water and sediment quality concerns.

3.1 PHYSICAL DESCRIPTION

Santa Monica Bay is an open embayment approximately 43 km (27 mi) across and delineated by Point Dume, which is northwest of the HTP, and the Palos Verdes Peninsula, south of the HTP; the surface area of the Bay is approximately 428 km^2 (266 mi^2) (MBC 1988). The Bay is characterized by a gently sloping continental shelf which extends seaward to the shelf break at water depths of approximately 80 m (265 ft) (Terry et al. 1956). Natural rocky outcrops are confined to the northern and southern portions of the Bay from Point Dume to the Malibu coast area to the north, and the Palos Verdes point area to the south, respectively. Sediments off the HTP are primarily composed of sand and silt, with lesser amounts of clay (CLA-EMD 2007a).

3.1.1 Physical Features

There are two submarine canyons in southern and central Santa Monica Bay: Redondo Canyon (off King Harbor, Redondo Beach, California) and Santa Monica Canyon (in the central portion of Santa Monica Bay upcoast of the HTP). Santa Monica Canyon heads at a depth of about 55 m (180 ft) at a location about 5.6 km (3.5 mi) offshore, and the average gradient along the canyon axis is 3 percent (Terry et al. 1956). The head of Redondo Canyon is much closer to shore, and the gradient is much steeper at the head (8 percent). However, the average gradient throughout the rest of the canyon (4 percent) is similar to that of Santa Monica Canyon.

Three coastal generating stations utilize the bay for cooling water purposes. The LADWP Scattergood Generating Station, located just downcoast from the HTP, withdraws up to 495 mgd of cooling water from Santa Monica Bay through a single cooling water intake structure. The El Segundo Generating Station, also located just downcoast from the HTP, operates two cooling water systems with a maximum permitted volume of 607 mgd. Lastly, the AES Redondo Beach Generating Station withdraws cooling water from up to three intake structures in King Harbor at a maximum rate of 890 mgd. A Chevron refinery also discharges about 6 to 7 mgd of treated effluent to Santa Monica Bay just downcoast from the HTP.

Two small-vessel harbors serve Santa Monica Bay: Marina del Rey and King Harbor. Fourteen artificial reefs designed to enhance marine life and provide sport fishing opportunities were installed off Malibu, Paradise Cove, Santa Monica, Marina del Rey, Manhattan Beach, Hermosa Beach, and Redondo Beach beginning in 1958; at least nine of these reefs remain (MBC 1993). Public piers are located at Malibu, Santa Monica, Venice, Manhattan Beach, Hermosa Beach, and Redondo Beach.

The salinity in the surface waters of the Southern California Bight (SCB), which includes the waters off southern California from Point Conception south to Cabo Colnett, Baja California, is relatively constant (isohaline). According to Dailey et al. (1993) salinities in the nearshore peak in July at around 33.6 parts per thousand (ppt) and decrease in late winter and early spring to 33.4–33.5 ppt. Nearshore salinities may be depressed significantly by inflows of storm water in response to rain events. Tides and temperatures are recorded continuously at the National Oceanographic and Atmospheric Administration (NOAA) station (Station ID: 9410840) located on the Santa Monica Pier; in 2006, the sea temperatures ranged from a March low of 11.4°C (52.5°F) to 24.3°C (75.7°F) in July and averaged 17.0°C (62.6°F).

3.1.2 Tides and Currents

Tides in southern California are classified as mixed, semi-diurnal, with two unequal high tides (high water and higher high water) and two unequal low tides (low water and lower low water) each lunar day (approximately 24.5 hr). From January 2006 through January 2007, water level extremes in Santa Monica Bay ranged from -0.622 m to +2.192 m (-2.040 ft to +7.192 ft) relative to Mean Lower Low Water (MLLW) (NOS 2007).

The prevailing current direction in the shallow, nearshore areas of Santa Monica Bay is downcoast (equatorward) suggesting an eddy-type circulation pattern resulting from the upcoast (poleward) currents outside of the bay (Hendricks 1980). This description is supported by more extensive studies by Hickey (1992) that also showed downcoast currents on the shelf within the Bay and prevailing upcoast (poleward) currents at the edge of the shelf at the outer boundary of the Bay. Hickey et al. (2003) found that subtidal currents in Santa Monica Bay are dominated by relatively long time scales (10–25 days), large alongshore scales, and significant offshore propagation. Large scale remote forcing initially pushes water into the bay as part of a throughflow, later becoming an eddy that produces counterflow in a typically southeastern direction along the Santa Monica Bay shoreline. However, currents shift in relation to upwelling events and other large scale hydrographic processes along the coast resulting in flow regimes that differ seasonally.

Hickey (1992) described the residence time of water within the Santa Monica and San Pedro basins using drifters. She found that the residence time is both spatially and temporally variable as some drifters barely moved at all whereas others nearby moved large distances in the same period. Drifters deployed in January 1990 escaped westward in about a week. In July, residence times were only 3–5 days for drifters deployed anywhere over Santa Monica Basin. She found that drifters caught up by the Santa Monica Canyon eddy escaped the basin in less than one week, and that most of the other drifters that were not cast ashore escaped the SCB in the ~2 week deployment period, roughly half passing north into the Santa Barbara Channel and half passing south of the Channel Islands.

3.2 BIOLOGICAL DESCRIPTION

The following sections describe the aquatic biological habitats and communities within Santa Monica Bay, including both invertebrate and fish communities. Santa Monica Bay is the submerged portion of the Los Angeles Coastal Plain, and includes several types of marine habitat that support more than 5,000

species of plants and animals (SMBRC 2005). Most marine organisms within Santa Monica Bay and its watershed are temperate species with geographic ranges extending far beyond the immediate area. Most species are members of the San Diegan Province, which extends from Point Conception south to Magdalena Bay, Baja California Sur (Horn and Allen 1978). Fewer species belong to the Oregonian Province, which ranges from southern Canada to northern Baja California.

The pelagic habitat of Santa Monica Bay includes the entire water column within the bay. Organisms found in this habitat include a myriad of planktonic organisms (phytoplankton, zooplankton, and ichthyoplankton) that have little or no swimming ability to resist ocean currents, and nektonic organisms, such as fishes and sharks that are freely mobile in local and oceanic currents. The pelagic habitat also supports large numbers of pinnipeds (including Pacific harbor seal and California sea lion), cetaceans (such as gray whale, bottlenose dolphin, and common dolphin), and birds, including California brown pelican, terns, and gulls (MBC 1988).

Intertidal habitat within the Santa Monica Bay is divided almost equally between sandy and rocky habitats (MBC 1988). Rocky intertidal habitat is comprised of both natural and artificial rocky substrate, such as the breakwaters at Marina del Rey and King Harbor. Natural rocky intertidal substrate occurs along the Malibu coast from Point Dume to Paradise Cove, along occasional patches from Paradise Cove to Big Rock Beach, and south along the Palos Verdes Peninsula.

Giant kelp beds occur on submerged rocky reefs in depths of about 20 to 70 ft. Kelp beds in the Bay are limited to locations on the Palos Verdes Shelf, approximately 6 km (3.7 mi) south of King Harbor, and along Leo Carillo State Beach and the Malibu coast (SMBRC 2005). Current canopy coverage is relatively low compared to historic coverage, but the extent of kelp is considered stable at Palos Verdes. The kelp beds in the Malibu area have increased in recent years, due in part to recent restoration efforts, improved water quality, and favorable oceanic conditions (SMBRC 2005; MBC 2008).

Most of the seafloor in the Santa Monica Bay and King Harbor consists of unconsolidated (soft) sediments comprised of sand, silt, and clay. Most of the energy entering this habitat is in the form of detrital fallout[9] and phytoplankton from the pelagic habitat, although detritus from surface runoff and discharged sewage may also be important (MBC 1988). A high proportion of invertebrates associated with soft-bottom habitat live most of their lives permanently in the sediments and are termed infauna; those which live on the surface of the seafloor are called epifauna. The soft-bottom habitat also supports several species of algae, macrofauna/megafauna (including crabs, snails, sea stars, urchins, and sea cucumbers), and fishes.

There are no major freshwater rivers that empty into the Santa Monica Bay, though there are some smaller streams. Small freshwater marshes occur at Malibu Lagoon and at Ballona Creek (MBC 1988). Fresh water introduced by storm water and urban runoff has attracted increased attention in recent years. Control of pollutants from runoff has proven difficult due to the ubiquitous nature of the sources.

[9] Detrital fallout, or detritus, is non-living organic particulate matter. It is typically composed of dead organisms, fragments of organisms and fecal material.

Some of the important human uses of the Santa Monica Bay that have directly and indirectly affected its ecology include sport and commercial fishing, industrial uses, and coastal development. Approximately 48 percent of the Santa Monica Bay's watershed is characterized as developed (SMBRC 2005). Most of the remaining undeveloped area is located in the Santa Monica Mountains National Recreation Area. Commercial fishing was banned throughout most of Santa Monica Bay by the California Department of Fish and Game in 1933 (MBC 1985). Sport fishing is allowed throughout the Santa Monica Bay, and landings are currently operated out of Marina del Rey and King Harbor. Recreational fish are also caught by private boaters, from shore, and from piers.

Industrial uses of the Santa Monica Bay include cooling water supply, transport and refinery of oil/gas products, and waste disposal. Both the Joint Water Pollution Control Plant (JWPCP) and the Hyperion Treatment Plant discharge treated wastewater to the Santa Monica Bay. The JWPCP discharges approximately 334 mgd of wastewater that has been treated to secondary levels through a network of outfalls offshore the Palos Verdes Peninsula (LACSD 2001). These facilities achieved full secondary treatment as of 1998 for Hyperion Treatment Plant and late 2002 for JWPCP (SMBRC 2005).

3.3 SEDIMENT AND WATER QUALITY

There are many potential pathways for contaminants to enter Santa Monica Bay, including point sources (such as wastewater treatment plants and refinery wastes) and non-point sources (such as from vessels, spills, aerial fallout, and urban runoff) (MBC 1993). Since 1971 there has been a steady decrease of contaminant inputs from the two wastewater treatment facilities to the Bay. Still, the Santa Monica Bay is listed as a Section 303(d) impaired waterbody largely due to sediment contamination resulting from the historic discharge of wastewater and sludge prior to the shutdown of the seven-mile outfall in 1987 and the provision of full secondary treatment at HTP in 1998 (SWRCB 2003, 2007b).

3.3.1 Sediment Quality

Elevated levels of the pesticide dichlorodiphenyltrichloroethane (DDT) are found in sediments and animal tissues throughout the Southern California Bight;[10] total DDT (i.e., the sum of all DDT isomers and metabolites [e.g., DDDs, DDEs, and DDTs] was detected in 82 percent of sampled sediments throughout the Bight in 1994 (Schiff and Gossett 1998). DDT is acutely toxic and resistant to degradation (NOAA 1991). The major source of DDT contamination off Palos Verdes was the Montrose Chemical Company, which manufactured DDT from 1947 to 1982, producing two-thirds of the chemical produced worldwide in 1970. Monitoring in 1970 indicated that about 290 kg (about 640 lbs) of DDT compounds were entering the Los Angeles County waste system on a daily basis. These compounds were subsequently discharged onto the Palos Verdes Shelf, as well as in the San Pedro Channel between Los Angeles and Santa Catalina Island (NOAA 1991). In 1983, the USEPA issued Cleanup and Abatement Orders to Montrose, and the company began site cleanup and source control measures (NOAA 1991).

Before DDT was banned in 1970 it entered the marine environment through the JWPCP, which is operated by the County Sanitation Districts of Los Angeles County (LACSD) and discharges offshore of

[10] Please refer to Section 3.1.1 for an explanation of the Southern California Bight.

Whites Point on the Palos Verdes Peninsula. The discharged DDT was subsequently distributed by local currents into Santa Monica Bay (and throughout southern California), and measurable concentrations still exist in sediments over much of the Bay (Bay et al. 2003). In Santa Monica Bay, DDT concentrations show a trend of decreasing values with an increased distance from the Palos Verdes Peninsula, and concentrations are decreasing with time (SMBRC 2005). In Bight-wide regional monitoring samples collected in Santa Monica Bay in 2003, DDT was reported in sediments from 71 percent of the Southern California Bight, with highest concentrations in sediments centered on the Palos Verdes shelf (Schiff et al. 2006). Highest concentrations of DDT were still found in the area of the Whites Point outfalls, and to the north in the direction of the predominant currents.

Region-wide surveys conducted in 1998 recorded elevated levels of DDT, chlordane, and polychlorinated biphenyls (PCBs) in the vicinity of the five-mile outfall; however, those levels were reflective of historic deposition and not the levels associated with more recent discharges (LARWQCB and EPA 2005). The results from 1998 also indicated that DDT and PCBs in sediments are a dominant source of contaminant levels in tissues of bottom-living fishes. DDT continues to be found in fish tissues throughout the Southern California Bight, although levels are declining with time. Elevated levels of polynuclear aromatic hydrocarbons (PAHs) as measured during the 1998 study continue to be detected in sediments near the HTP's seven-mile outfall, reflective of the sludge discharge that occurred prior to the shutdown of the seven-mile outfall in 1987. Effluent levels of DDT, PAHs, PCBs, and chlordane discharged through HTP's five-mile outfall remain at non-detectable levels (LARWQCB and EPA 2005).

In 2005, the Los Angeles RWQCB adopted a Total Maximum Daily Load (TMDL) for metals and organics in sediments in Ballona Creek and the Ballona Creek estuary, adjacent to and including a small portion of nearshore waters in Santa Monica Bay. This TMDL became effective in January 2006. TMDL targets were established within the estuary for chlordane, total DDT, total PCBs, total PAHs, cadmium, copper, lead, silver, and zinc. The TMDL found that urban storm water, urban runoff (dry weather), atmospheric deposition, and NPDES-permitted discharges within the watershed were the major sources of these pollutants to the Ballona Creek estuary. The HTP was not found to be a source of pollutants to the Ballona Creek estuary sediments.

3.3.2 Water Quality

Santa Monica Bay is adjacent to the Los Angeles metropolitan area and has a shoreline of about 80 km. Santa Monica Bay is not only an important source of tourism and revenue, but is also an important ecological resource providing habitat to over 5,000 wildlife species [see Dojiri et al. (2003) and the references therein]. The drainage area to the Santa Monica Bay is about 1,036 km^2, and the watersheds of Ballona Creek, Malibu Creek, and Topanga Creek account for 63 percent of the total drainage area. Santa Monica Bay receives pollutants from urban runoff, deposition from the atmosphere (Stolzenbach et al. 2001), two marinas and seven major point sources; three municipal wastewater treatment plants, three coastal generating stations, and one oil refinery. Non-processed wastewater from over 160 smaller commercial and industrial facilities is also discharged into storm drains that flow to the Bay (SMBRC 2008). Pollutants entering Santa Monica Bay include arsenic, chromium, copper, lead, mercury, nickel,

zinc, bacteria such as *E. coli*, suspended solids, nitrate, phosphorus, ammonia, DDT, PCBs, oil, grease and debris.

The Regional Board regards Santa Monica Bay—both its nearshore and offshore environments—as "water quality limited" as described in the 2006 Clean Water Act Section 303(d) list (SWRCB 2007b), requiring TMDLs for DDT (tissue and sediment, and centered on the Palos Verdes Shelf), debris, PCBs (tissue and sediment), sediment toxicity, and fish consumption advisory (SWRCB 2007b). The Regional Board understands the potential sources of the water quality limitations to be both non-point and point sources (SWRCB 2007b). TMDLs to address these impairments are scheduled to be completed by 2019 (SWRCB 2007b). TMDLs were adopted by the RWQCB to address a 303(d) listing for bacteria in 2002 and 2006.

The Santa Monica Bay beaches are among the most comprehensively monitored for bacterial water quality in the nation, with more than one-third of the sampling locations monitored daily (Schiff et al. 2001). As discussed above, the Santa Monica Bay is considered impaired largely due to sediment contamination resulting from the historic discharge of wastewater and sludge (SWRCB 2007b). However, it has been demonstrated that shoreline contamination has resulted primarily from storm drain flows and other non-point sources (CLA-EMD 2007a). Data collected from January 1995 through December 1999 show that urban runoff during both dry and wet weather is the major contributor to exceedances[11] of indicator bacteria (Schiff et al. 2003). Because the HTP effluent plume is trapped below the thermocline during most ocean conditions, and because it is located well offshore, HTP discharge is not believed to contribute to the exceedances of water quality criteria for bacteria at the shoreline. Therefore, collection of shoreline samples was removed from the latest HTP NPDES permit issued in 2005 (and subsequently required as part of Los Angeles County's Municipal Separate Storm Sewer System (MS4) Permit).[12] Shoreline and nearshore/inshore water quality monitoring conducted by the City of Los Angeles since the 1940s indicates that elevated bacterial counts and observed exceedances of water quality objectives in the nearshore area are associated with runoff from storm drains and discharge from piers.

3.3.3 Pollutant Sources

There are multiple potential pathways for contaminants to enter Santa Monica Bay, including direct sources (such as wastewater outfalls) and indirect sources (such as atmospheric deposition and runoff). Since the adoption of the Federal Water Pollution Control Act in 1972 and subsequent amendment of the Clean Water Act in 1977, significant advances in wastewater treatment have been realized. For example, the mass loading of most metals from the Bay's two major municipal wastewater facilities (the HTP and the JWPCP) has decreased steadily since 1971 (SMBRC 2005). Annual loading of total heavy metals has decreased by over 98 percent (from 3,300 to 65 metric tons), and the annual loading of total suspended solids (TSS) has decreased by 93 percent (from 250,000 to 15,780 metric tons). This report focuses on

[11] The exceedances were defined using the State of California Health Department thresholds for single sample results: (1) total coliform>10,000 organisms per 100 ml; (2) fecal coliform>400 organisms per 100 ml; (3) enterococcus>104 organisms per 100 ml; or (4) total coliform per fecal coliform<10, when total coliforms are greater than 1,000 organisms per 100 ml.

[12] Shoreline microbiological samples were collected six days per week as part of the previous HTP NPDES permits.

contribution of direct sources from HTP. Specifically, the analysis in Section 4.0 and 5.0 of this report focuses on potential impacts from the future discharge of treated wastewater from HTP's five-mile outfall that originates from the Proposed Project and other sources of wastewater handled by HTP, and not discharges of potential contaminants to the ocean from other sources such as those described in this section. However, for background the following section provides a discussion of other pollutant sources, focusing on atmospheric deposition and storm water runoff.

The HTP NPDES permit considered atmospheric deposition on Santa Monica Bay (HTP NPDES Permit, pp. 10-11.) The final report concluded that aerial deposition is a significant contributor to the overall pollutant loading to Santa Monica Bay for trace metals, such as lead, chromium, and zinc. On an annual basis, daily dry atmospheric deposition of metals on Santa Monica Bay and its watershed far exceeds the amount deposited by wet deposition during rain events. Chronic daily dry atmospheric deposition is also far greater than deposition during Santa Ana conditions when large volumes of polluted air are blown from inland areas to the ocean. Most of the mass of metals deposited by dry atmospheric deposition on Santa Monica Bay and its watershed originates as relatively large (larger than 10 microns) aerosols from area sources (e.g., off-road vehicles and small businesses) in the Santa Monica Bay watershed.

Over the last forty years, the relative contribution of contaminants from various point sources has changed significantly, with the dominant source shifting from point sources to nonpoint[13] source urban runoff (Dojiri et al. 2003).

Wong et al. (1997) estimated metal loadings in Santa Monica Bay watershed storm water discharges using a geographic information system (GIS)-based empirical runoff model that included information on rainfall, land use, drainage area extent, and measurements of water quality. Wong et al. found that simulated nonpoint source loads were a significant source of metals to the nearshore waters of Santa Monica Bay, contributing 10, 37, and 57 tons/year of copper, lead, and zinc, respectively.

In 2003-2004, researchers from the Southern California Coastal Water Research Project (SCCWRP) placed dry deposition plates at seven locations throughout southern California. Results from the individual deposition plate measurements were used to estimate annual dry deposition metals fluxes, and results were combined to yield an average metals flux for urban and non-urban sites, including both the Ballona Creek and Malibu Creek watersheds, which drain directly to Santa Monica Bay. Sabin et al. (2005b) found that metals fluxes were relatively uniform at all the urban sites, and that the metals deposition fluxes were relatively invariant by season.

Sabin et al. (2005b) integrated the results of the deposition plate measurements across watersheds, as shown in Table 6. Dry deposition fluxes to individual watersheds were compared to model estimates of storm water loads from these watersheds, as shown in Table 6. Sabin et al. (2005b) used these data to calculate a "watershed transmission efficiency" – a measure of the fraction of the annual metals

[13] Nonpoint source (NPS) pollution differs from point source pollution (e.g., industrial and sewage treatment plants) in that it comes from many diffuse sources. NPS pollution is caused in southern California by rainfall moving over and through the ground. As the runoff moves over land surfaces, it picks up and carries away both natural and man-made pollutants, which may then be deposited into rivers and coastal waters (see http://222.epa.gov/owow/nps/qa.html for more detail).

deposition that was found in storm water during their study period. Sabin et al. found that storm flow metals loads were equivalent to approximately 10-40 percent of the metals deposited via dry deposition to the watersheds during the study period. Additional work by Sabin et al. (2005a) found that the "transmission efficiency" in a small impervious watershed ranged from 57 to more than 100 percent in a subsequent study year. Data from Los Angeles County (not shown; LACDPW 1999; 2000a; 2000b; 2001; 2002; 2003; 2004; 2005a; 2005b; 2006; 2007) indicate that metals loads in storm flows can vary greatly from year to year, and may be more than double the annual dry deposition flux to the watershed.

Table 6. Mean annual loadings of trace metals to watersheds in the Los Angeles coastal region 1. From Sabin et al. (2005b).

	Chromium	Copper	Nickel	Lead	Zinc
Atmospheric Deposition (MT/Year)					
Los Angeles River	3.0 (2.1-3.9)	16 (10-22)	3.7 (2.4-5.1)	12 (6-18)	80 (54-110)
Ballona Creek	0.56 (0.37-0.75)	3.5 (2.0-5.0)	0.59 (0.39-0.79)	2.0 (1.1-2.8)	13 (12-15)
Dominguez Channel	0.9 (0.24-1.6)	2.1 (1.6-2.6)	0.9 (0.33-1.5)	1.6 (-0.1-3.3)	9.4 (3.8-15)
Lower Santa Ana River	0.78 (0.47-1.1)	3.8 (3.0-4.6)	0.9 (0.6-1.2)	1.6 (1.0-2.3)	37 (11-64)
Malibu Creek	0.10 (0.09-0.1)	0.35 (0.32-0.38)	0.13 (0.10-0.15)	0.14 (<DL-0.14)	1.4 (1.3-1.5)
Stormwater Runoff[2]					
Los Angeles River	0.68	3.11	0.86	1.04	17.30
Ballona Creek	0.17	0.72	0.21	0.23	3.72
Dominguez Channel	0.13	0.65	0.17	0.23	4.00
Watershed Transmission Efficiency[3]					
Los Angeles River	23%	19%	23%	9%	22%
Ballona Creek	30%	21%	35%	11%	29%
Dominguez Channel	13%	31%	18%	14%	43%

[1]95% confidence intervals shown in parentheses, expect for Malibu Creek, which has the range.
[2]From watershed runoff model (Ackerman and Schiff 2003).
[3]Calculated as the ratio of stormwater runoff to indirect atmospheric deposition.

Stolzenbach et al. (2001) measured wet deposition on land surfaces directly and estimated dry deposition of metals within the Santa Monica Bay watershed. These data were used to calibrate and verify the UCLA SMOG model, which was used to estimate dry deposition mass fluxes on land and water surfaces. The results indicated that the annual rate of atmospheric transport and deposition of trace metals to Santa Monica Bay is significant relative to other inputs of metals to the Bay. Stolzenbach et al. concluded that "atmospheric sources were a significant contributor to metal loadings to Santa Monica Bay, particularly for lead (99%), chromium (50%), and zinc (43%)."

An issue associated with storm runoff and other non-point discharges, which has become an increasing problem in the marine environment as the population in southern California has increased, is trash and debris (SMBRC 2005). Moore et al. (2001) identified four major pathways for trash and debris to enter the marine environment: littering by beachgoers, wind driven from upland sources, runoff from land-based sources, and overboard disposal from boating activities. Not only are they an aesthetic nuisance, trash and debris can result in harm to organisms and become a detriment to water bodies. In 2004 it was

estimated that 1.4 million tons of trash was entering the Bay every year, equivalent to nearly 25 percent of all trash generated in the Santa Monica Bay watershed (SMBRC 2005).[14] The increasing problem of trash in the marine environment of Santa Monica Bay led the Los Angeles RWQCB to adopt a TMDL for trash in Ballona Creek designed to prevent all trash from entering the Creek by 2013 (SMBRC 2005). Efforts to reduce trash and debris include increasing frequency of street sweeping and cleaning catch basins as well as the installation of structures to capture trash and debris in storm water and urban runoff before it reaches the marine environment (SMBRC 2005).

4.0 ASSESSMENT OF IMPACTS OF WASTEWATER DISCHARGES FROM HYPERION ON SANTA MONICA BAY

The HTP five-mile outfall is designed to provide rapid mixing and dilution, and therefore minimize effects to water quality and marine resources. As results from the Visual Plumes model, discussed below, suggest, discharges from the HTP are diluted rapidly upon discharge, so that concentrations of major constituents of concern, including metals, are below water quality objectives at the edge of the zone of initial dilution (i.e., near the diffuser, and far from the shoreline). Further, because the wastewater plume is generally trapped below the thermocline, the discharge plume from the HTP has never been detected within 2.5 km of the Santa Monica Bay shoreline (LARWQCB 2005, p. F-13). Shoreline and nearshore/inshore water quality monitoring conducted by the City of Los Angeles since the 1940s indicate that effluent from the HTP five-mile outfall does not reach the shoreline.

The analysis in this section is focused on the future discharge from HTP's five-mile outfall of treated wastewater, including wastewater that originates from the Proposed Project.

4.1 GENERAL DESCRIPTION OF WASTEWATER PLUME MIXING

The diffusers of the five-mile outfall are designed to provide a minimum dilution ratio of 84:1 in the Zone of Initial Dilution (CLA-EMD 2007a).

As summarized in Section 2.3.1, above, the transport of discharged wastewater particles off the HTP is depth dependent (CLA-EMD 2007a). Those particles that rise to the sea surface are transported shoreward, while those that settle to the seafloor are transported offshore (Noble and Xu 2003). Surface transport is more predominant in winter when the water column is less stratified (CLA-EMD 2007a). Shoreward of the discharge where the thermocline intersects the rising seafloor is the theoretical limit of the wastewater plume's approach to the shoreline (LARWQCB and EPA 2005). The plume has never

[14] In studies conducted along Orange County beaches, it was found that three categories of plastics (pre-production plastic pellets, foamed plastics and hard plastics) accounted for more than 99 percent of the total items found and 51 percent of the weight (Moore et al. 2001). Cigarette butts were the fourth most abundant item found, though accounting for less than 1 percent of the total abundance and weight of trash items found, followed by paper, wood, metal, glass, rubber, pet and bird droppings, cloth, and other items.

been detected closer than 2.5 km from shore, at the 45-m (148-ft) depth contour (LARWQCB and EPA 2005).

4.2 DESCRIPTION OF PHYSICAL EFFECTS

Once discharged, a wastewater plume will immediately begin mixing with receiving waters, and the amount of mixing will depend on the diffuser design and on the characteristics of both the effluent and receiving waters. The following are examples of potential physical effects resulting from wastewater discharge:

- Increase in turbidity resulting from discharge of solids;
- Reduction in salinity due to discharge of lower salinity (less dense) wastewater; and
- Introduction and deposition of metals and other contaminants into receiving waters and surrounding sediments.

4.3 DESCRIPTION OF BIOLOGICAL EFFECTS

The previously mentioned physical effects resulting from wastewater discharge (Section 4.2) can result in biological effects, as well. The following are examples of potential biological effects resulting from wastewater discharge:

- Potential changes in species composition and distribution in affected areas;
- Potential diseases/abnormalities or toxicity to aquatic organisms in affected areas;
- Accumulation of contaminants in tissues of aquatic organisms in affected areas;

In general, the discharge of wastewater into nearshore waters of southern California historically resulted in an increase in the abundance and biomass of bottom fish and invertebrates, and a decrease in the variety of species present (Mearns et al. 1974). These discharges may have reduced densities of species that would otherwise be abundant, and stimulated populations of organisms that would otherwise be in lesser abundance (Mearns et al. 1974). It is important to note these effects change through time, as well. The historic discharge of organic matter stimulated deposit feeders and suspension feeders off Palos Verdes (LACSD 2001). Surface sediment quality on the Palos Verdes shelf and slope in the vicinity of the Los Angeles County Sanitation Districts outfalls improved as a result of reduced mass emissions from 1972-2000 (Paulsen et al. 1999; LACSD 2001). At the same time, infaunal assemblages near the outfalls became more like those distant from the discharges.

In the early 1970s demersal fish abundance, species richness, and diversity were depressed in the vicinity of wastewater outfalls in Santa Monica Bay and the Palos Verdes Shelf (Allen 2006). In contrast to demersal fishes, the outfall pipes attracted large numbers of rockfishes and other species. The physical structures of the outfalls themselves provide habitat, acting as artificial reefs. Inshore portions of the HTP's five-mile and seven-mile outfalls provide habitat for gorgonian corals (*Lophogorgia chiliensis* and *Muricia* spp.) and colonial anemones (*Corynactis californica*) that would otherwise be absent in the soft-bottom habitat (Allen and Moore 1976).

In the 1970s wastewater outfalls discharged relatively high levels of suspended solids, as well as contaminants, resulting in sediments with high levels of organic carbon near the outfalls. These sediments were dominated by polychaetes, whereas sediments with less organic carbon were dominated by crustaceans (e.g., amphipods). In the 1970s the relative abundance of sanddab-guild fishes (predominantly crustacean feeders) was significantly lower on the Palos Verdes Shelf than that of the turbot-guild species (polychaete feeders). In contrast, the relative abundance of sanddab-guild species was significantly higher in reference areas. Allen used this relationship to develop a biointegrity index (the Fish Response Index). Application of the Fish Response Index to the Southern California Bight in 1998 revealed reference-level fish assemblages throughout the Bight except near the mouth of the Santa Clara River. Other fish assemblage attributes (abundance, biomass, species richness, and diversity) did not differ at outfall areas from reference areas of similar depth on the shelf in region-wide assessments in 1994 and 1998 (Allen 2006).

Off the HTP, the number of benthic macrofaunal species collected has increased since the initiation of full secondary treatment, and in 2005 the greatest number of species occurred in the Zone of Initial Dilution (CLA-EMD 2007a). However, the pollution-sensitive brittle star *Amphiodia urtica* continues to be absent or in low abundance in samples collected near the five-mile outfall. The trawl-caught fish and invertebrate communities offshore the HTP also increased in abundance and diversity after the initiation of full secondary treatment (CLA-EMD 2007a). Effects on the distribution of organisms around the vicinity of the five-mile outfall are still detectable, though these effects are restricted to a much smaller area than historically recorded, suggesting the spatial footprint of impacts is diminishing.

Contaminants in southern California wastewater discharges can potentially accumulate in tissues of organisms exposed to the effluent (Young and Moore 1978). However, tissue concentrations are usually low and below U.S. Food and Drug Administration action levels (Young and Moore 1978). In 2005-6, tissue contaminant concentrations measured in fishes of Santa Monica Bay were similar to those measured in previous surveys in the last two decades (CLA-EMD 2007a). It was noted that tissue contaminant concentrations did not necessarily correspond to sediment contaminant concentrations from the same areas. Concentrations of mercury in fish tissue were below U.S. Food and Drug Administration action levels. However, levels of PCBs and mercury in some fish species exceeded the more restrictive EPA and State Office of Environmental Health Hazard Assessment (OEHHA) screening values, which are used to identify values that may be of potential concern to human health (CLA-EMD 2007a).

However, constituent pollutants in the Bay generally have been reduced in recent years. HTP has operated with full secondary treatment since December 1998 and levels of constituent elements in the Bay are evaluated under the preferred mass emission approach. The City's 2003 Transmittal of Ocean Discharge Criteria Report repeats earlier conclusions (SMBRP 1998) that sensitive marine organisms in the Santa Monica Bay are not threatened by HTP discharges. Seven endangered species reside in various habitats within the Bay, and while only five percent of the historical habitat used by these species remains in the watershed, none of the seven species are directly impacted by treated HTP effluent. Similarly, the toxicity monitoring program has shown no exceedances for acute toxicity in species such as the fathead minnow or chronic toxicity in species such as kelp, abalone or *Menidia* during critical developmental stages.

These findings, combined with the fact that recreational fishing activities remain common in the Bay, suggest that HTP effluent is not considered to pose any threat to critical marine organisms.

4.4 EVALUATING POTENTIAL IMPACT OF PROPOSED PROJECT

For purposes of this analysis, wastewater generated by the Proposed Project is assumed to be typical of residential wastewater already conveyed to the HTP. Once the wastewater from the Proposed Project is conveyed to the HTP, it mingles with other waste streams. The waste stream is altered as it undergoes treatment and is either discharged or transferred to the West Basin Facility for additional treatment. It is important to note that the Proposed Project's wastewater flows are inseparable from wastewater flows from other sources in the area. Therefore, this report analyzes the effects of the incremental increase in wastewater flow through HTP due to the Proposed Project combined with projected future flows as of 2010 and 2020. In particular, this analysis considers whether the Proposed Project combined with the projected future flows as of 2010 and 2020 will result in an exceedance of the NPDES permit requirements.

4.5 MODELED IMPACTS FROM DISCHARGE FLOW VOLUMES FROM HYPERION TREATMENT PLANT

As calculated in the original DEIR, the incremental increase in wastewater generated by the Proposed Project is projected to be 0.47 mgd during average dry-weather conditions.[15] These flows would be conveyed through on-site sewer infrastructure, and ultimately to the HTP, where they would be treated and either discharged to Santa Monica Bay or conveyed to the West Basin Facility for further treatment.

In general, the amount of water discharged by the HTP to Santa Monica Bay has decreased during the last 10 years (Figure 3; CLA-EMD 2008a). From January 1998 through December 2007 the annual average flow rate decreased from 352 mgd to 282 mgd, a reduction of approximately 20 percent. Flow during the first seven months of 2008 averaged 288 mgd (CLA-EMD 2008a).

[15] The Proposed Project's peak dry-weather flow was estimated to be 1.12 mgd in the 2003 Draft EIR. A subsequent Psomas Sewer Area Study Calculation and Report provides a more detailed calculation of peak dry-weather flow, and estimates it to be 2.3666 cfs, or 1.53 mgd (Psomas 2005, "Sewer Area Study Calculations and Report for Playa Vista – Phase 2 Tract 60110-01," January 20, 2005). Use of 0.47 mgd, the projected average Village at Playa Vista flow, is an appropriate figure to use for this analysis because treatment plant capacity, and subsequent discharge to Santa Monica Bay, is tied to average day dry-weather flows rather than peak day dry-weather flows that occur diurnally.

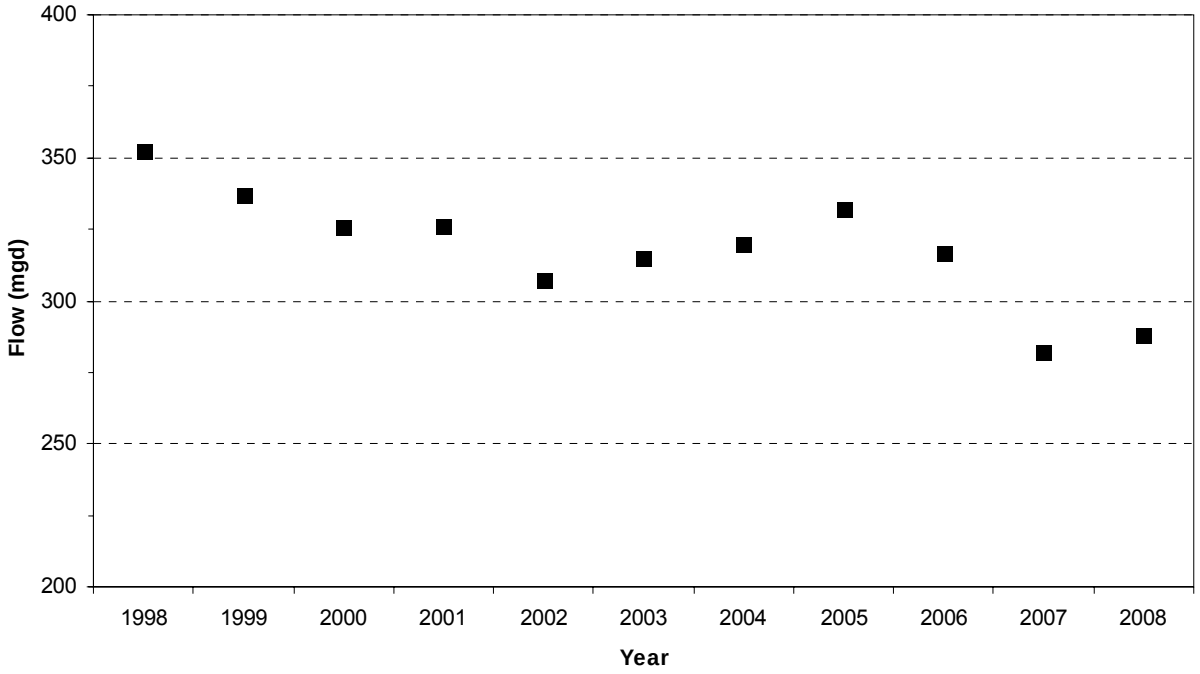

Figure 3. Average daily effluent discharge volumes (mgd) at the HTP by year, 1998-2008.
Note: 2008 data includes January through July.

Monthly minimum, average, and maximum flow rates (expressed as mgd) for the HTP were obtained from HTP staff for the period January 1998 through July 2008 (Figure 4; CLA-EMD 2008a). Note that the 'minimum' and 'maximum' do not represent instantaneous minima or maxima, but instead represent the lowest and highest daily flow rates during each month. Also included in Figure 4 is the monthly rainfall total recorded in Manhattan Beach from January 1998 through September 2006 (LACDPW 2008). Peak effluent flows from the HTP obviously correspond to periods of heavy rainfall. Based on the decline in average flows depicted in Figures 3 and 4, the incremental increase in wastewater discharge due to the Proposed Project will result in effluent flow volumes consistent with those recorded in the recent past.

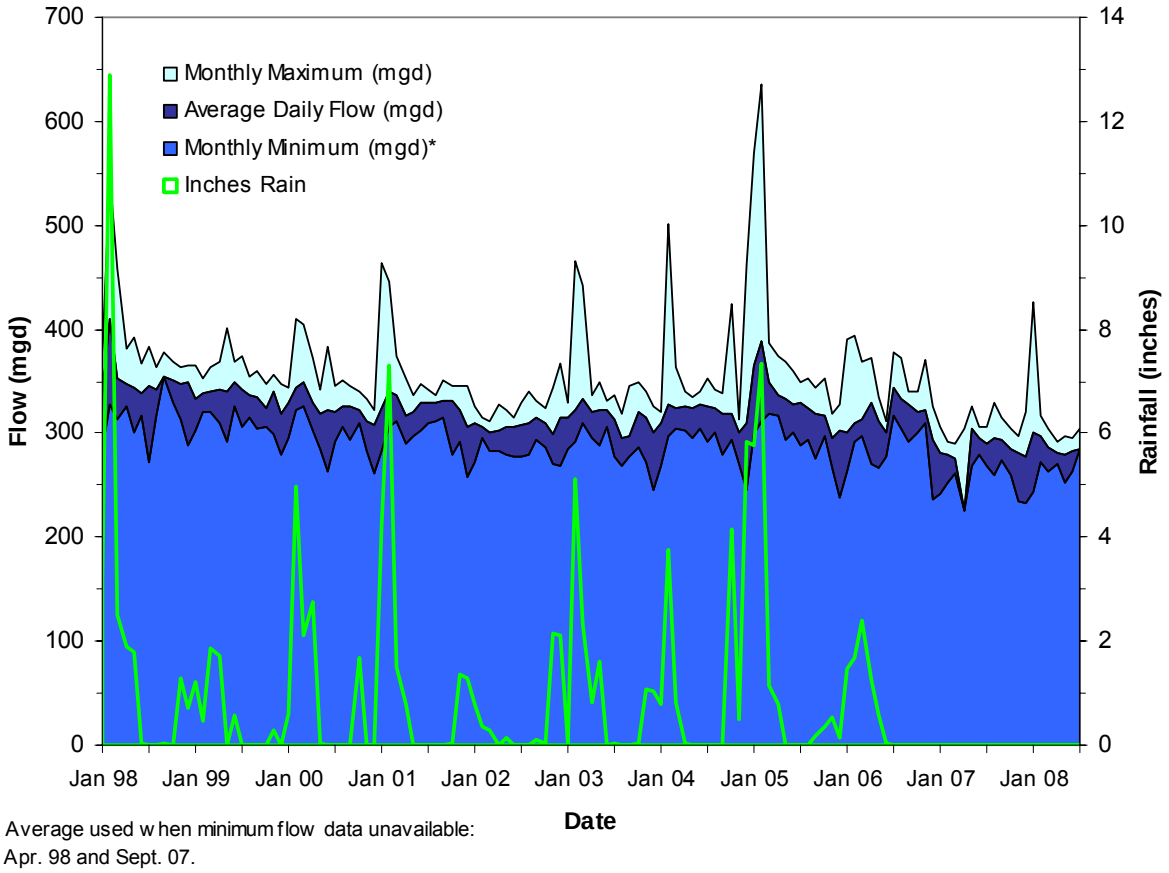

Figure 4. Minimum, average, and maximum daily effluent discharge volumes (mgd) at the HTP by month, January 1998-July 2008. Green line represents monthly rainfall recorded in Manhattan Beach, January 1998-September 2006.

4.5.1 Hyperion Five-Mile Outfall Dilution Analysis

As detailed below, Flow Science conducted an analysis of the dilution of effluent discharged from the HTP via the five-mile outfall, and of the change in dilution that would result from the addition of the project flow increment. Results confirm the diffuser achieves greater dilution than the 84:1 dilution ratio specified in the HTP NPDES permit.

Treated waste water from the HTP is typically discharged to the ocean through the five-mile outfall in Santa Monica Bay. There are two diffuser legs of the same size and port configuration at the end of the five-mile outfall pipe. The configuration of each diffuser leg is summarized in Table 7.

Table 7. HTP Five-mile outfall diffuser configurations

Length		4000 ft		
Internal diameter		6 to 8.5 ft		
Ports	**Number**	50	21	12
	Diameter (inch)	6.75	7.75	8.125
Port spacing		48 ft alternately on right and left sides		
Discharge depth		187 ft		

In this report, seven discharge scenarios summarized in Table 8 have been analyzed.

Table 8. Discharge scenarios.

Scenario Number	Scenario Name	Discharge Rate (mgd)
1	2005 actual average flows	332
2	2007 actual average flows	288
3	2010 projected average flows, without project increment	296.2
4	2010 projected average flows, with project increment	296.7
5	2020 projected average flows, without project increment	334.5
6	2020 projected average flows, with project increment	335.0
7	NPDES permitted flows	450

Source: CH2MHill (2008).

These scenarios were selected to illustrate the impact of the project on the HTP wastewater plume for various HTP flow scenarios. Scenario 1 represents the actual HTP discharge to Santa Monica Bay in 2005, which corresponds with the flows used to calibrate the Sewer Flow Estimating Model in CH2MHill (2008). Since 2005, discharge flow rates from HTP have decreased; for this reason, Scenario 2 was run to reflect the most current data available. Scenario 3 represents the projected average flows discharged from HTP in 2010 without the Proposed Project, and Scenario 4 includes the Proposed Project in the anticipated HTP 2010 flow rates. Scenario 5 represents the projected HTP flows in 2020, without the Proposed Project, and Scenario 6 represents the projected HTP flows in 2020, with the Proposed Project. Finally, Scenario 7 was modeled as a conservative scenario, illustrating maximum flow conditions under the existing HTP NPDES permit limit.

The modeled discharge rates from Table 8 were calculated by CH2MHill (2008). Each discharge scenario was analyzed for two seasonal conditions: cool weather (February) and warm weather (August). Temperature and Total Dissolved Solids (TDS) data for the effluent in February and August of 2005 and 2007 are listed in Table 9. Obviously, effluent temperature varies more with season than effluent TDS.

Table 9. Properties of the five-mile outfall effluent.

5-mile outfall effluent	2005		2007	
	February	August	February	August
Temperature (ºF)	73.8	84.4	73.9	84.9
TDS (mg/l)	840	830	902	906

4.5.2 Ambient sea water profiles

Sea water properties such as temperature and salinity are measured quarterly at a number of stations around the diffuser by the Environmental Monitoring Division (EMD) of the City of Los Angeles. These data can be downloaded from the website of Southern California Coastal Ocean Observing System (SCCOOS). These quarterly data show that in each year the weakest seawater stratification usually occurs in February, and the strongest stratification is in August. February and August sea water data in 2005-2007 from the station closest to the diffuser (station 3505) are listed in Tables 9 and 10. Data for August 2007 (i.e., 2007.08) were not available on the SCCOOS website, but were instead obtained from the EMD. Raw data from EMD have been averaged over relevant depth intervals to fill in the last column of Tables 10 and 11.

Table 10. Sea water temperature (ºC) profile near the diffuser.

Depth (m)	2005.02	2005.08	2006.02	2006.08	2007.02	2007.08
1	15.56	19.09	14.58	18.53	14.63	20.59
5	15.08	18.44	14.43	17.09	14.58	20.07
10	15.07	13.75	14.37	14.99	14.49	18.43
15	15.07	13.05	14.23	14.24	14.47	17.05
20	14.97	12.41	13.96	13.72	14.45	15.77
25	14.40	11.72	13.66	13.42	14.42	14.93
30	14.09	11.31	13.12	12.99	14.37	14.18
35	13.34	11.18	12.18	12.61	14.36	12.76
40	12.96	11.06	11.99	12.53	14.26	12.39
45	12.70	10.95	11.94	12.03	14.17	11.76
50	12.36	10.75	11.66	11.76	14.04	11.18
55	12.12	10.64	11.01	11.65	13.68	10.92

Table 11. Sea water salinity (parts per thousand [ppt]) profile near the diffuser.

Depth (m)	2005.02	2005.08	2006.02	2006.08	2007.02	2007.08
1	33.04	33.43	33.39	33.42	33.57	33.62
5	33.06	33.42	33.38	33.38	33.57	33.67
10	33.08	33.30	33.38	33.36	33.57	33.72
15	33.09	33.29	33.38	33.36	33.57	33.64
20	33.12	33.30	33.38	33.39	33.57	33.61
25	33.14	33.33	33.38	33.40	33.57	33.60
30	33.15	33.30	33.38	33.39	33.56	33.59
35	33.15	33.29	33.34	33.36	33.57	33.49
40	33.12	33.31	33.36	33.42	33.56	33.51
45	33.15	33.38	33.37	33.45	33.56	33.50
50	33.21	33.51	33.39	33.46	33.54	33.58
55	33.26	33.56	33.59	33.47	33.54	33.70

4.5.3 Analysis of effluent plumes

Two methods have been used to estimate the dilution of the effluent from the five-mile outfall diffuser: an analytic method, and EPA's Visual Plumes method. Both methods predict dilutions within the "Zone of Initial Dilution". The analytic method is based on dimensional analysis and empirical observations. Results from the analytic method give an approximate range of dilution obtainable under the discharge conditions. Visual Plumes is a widely accepted diffuser discharge model that can readily incorporate the effect of an ambient current, a nonlinear density profile, and requires less analysis time. The analytic method was only used to estimate the dilution of the 2005 and 2007 discharges. The Visual Plumes model was used to analyze the dilution of all discharge scenarios.

Seawater is usually density stratified, and the rising and dilution of an effluent plume are strongly affected by this stratification. Generally speaking, for a bottom discharged, positively buoyant effluent, such as the HTP discharge, stronger sea water stratification results in a lower height of rise and a lower effluent dilution, while weaker stratification allows the plume to rise higher and achieve greater dilution. In February, the weakest stratification is observed to occur; in August, stratification is strongest. Therefore, in this analysis, dilution of the discharged effluent was analyzed only for February and August.

The "Y"-shaped diffuser structure has two legs, and there may be interactions between the effluent plumes from the two legs, which would considerably complicate the dilution analysis, but this is unlikely except in the presence of an ocean current. For the purposes of this analysis, effluent from one diffuser leg was analyzed, and it was assumed there is no interaction between effluent plumes from the two legs.

4.5.3.1 Analytic method

The mixing and dilution of the discharged effluent is influenced by a number of factors such as the discharge flow rate, effluent density, ambient water density, ocean currents, and turbulence. Assumptions and simplifications have to be made to estimate the dilution of the effluent analytically. Since the density of the Hyperion outfall effluent is less than ambient sea water density, the effluent plume will rise due to buoyancy. Effluent from each individual diffuser port will form a small plume adjacent to that port. As these small plumes rise, they mix with ambient water, grow larger in size and usually merge with adjacent plumes. In analyzing this type of diffuser, it is usually assumed that the discharge can be represented as a uniform linear discharge. Ambient sea water is stratified and the stratification usually varies with depth and time. To simplify the analysis, the density stratification of ocean water is approximated as linear.

As the plume rises, it mixes with ambient water and becomes diluted. Assuming the plume always mixes with clean sea water along its rising path, the centerline dilution, S, can be estimated by equations (1) and (2) (equations 10.3 and 10.4 of Fischer et al. (1979), with coefficients adjusted for a horizontal discharge).

$$S = 0.36 g'^{1/3} y_{\max} / q^{2/3} \quad (1)$$

Where:

$g' = g\Delta\rho / \rho$ is the reduced gravity
g = gravitational acceleration
$\Delta\rho$ = density difference between the ambient fluid and the discharge
ρ = density of the discharge
q = discharge per unit diffuser length

$$y_{\max} = 2.5(g'q)^{1/3}\left(\frac{-g}{\rho}\frac{d\rho_a}{dy}\right)^{-1/2} \quad (2)$$

y_{max} is the maximum height of rise of the plume, and ρ_a is the ambient density.

The average dilution of the plume at the terminal height of rise is:

$$S_a = \sqrt{2}S \quad (3)$$

The plume rises to the height at which its average density becomes the same as ambient seawater. At this point, the plume stops rising and forms a layer of a certain thickness below the height of maximum rise. When the rising plume reaches the bottom of this layer, it starts mixing with the previously discharged diluted effluent in this layer and hence the dilution does not increase, although the plume may still be rising. Considering the more realistic effect of the diluted effluent layer on top of the rising plume, the dilution should be adjusted by equation (4) (equation 10.22 of Fischer et al. (1979)).

$$S_{aw} = S_a - A\sqrt{\frac{A^2}{4} + S_a} + \frac{A^2}{2} \quad (4)$$

where

$$A = \frac{S_a q^{1/2}}{0.8 y_{\max} \left(\frac{-g}{\rho} \frac{d\rho_a}{dy} \right)^{1/4}}$$

Using these equations and input data listed in the previous section, the 2005 and 2007 discharges were analyzed. The results for February and August ocean profiles are listed in Table 12.

Table 12. Results from the analytic method.

Discharge scenario	Discharge rate (mgd)	Season	Sea water profile	Currents (m/s)	Plume top (ft below sea surface)	Dilution
2005 discharge	332	cool	2005.02	0	113	133
2005 discharge	332	warm	2005.08	0	114	134
2007 discharge	228	cool	2007.02	0	36	290
2007 discharge	228	warm	2007.08	0	141	90

The analytic method is based on dimensional analysis and empirical observations, which generally serve as the bases for diffuser design in engineering projects. It is likely that the analytic method used in this analysis closely resembles the calculation methods that were used when the HTP outfall and diffuser were designed. While the analytic method is too cumbersome to allow us to evaluate a wide range of scenarios with this method, it confirms the initial dilution estimates made during diffuser design. Thus, the analysis shown here confirms that the diffuser achieves the dilution values for which it has been permitted.

4.5.3.2 Visual plumes

Visual Plumes is a diffuser mixing zone computer modeling package developed by a joint effort led by US EPA. Visual Plumes can simulate both single and merging submerged plumes under stratified ambient water profiles with ocean currents. The UM3 model—part of the EPA Visual Plumes diffuser modeling package—was used to simulate the discharge from one leg of the HTP five-mile outfall diffuser.

As discussed previously, in each year, the stratification of ambient sea water is usually the weakest in February and the strongest in August. For the seven discharge rates listed in Table 8, the effluent plumes were analyzed for February and August for each discharge (2007 data were used for 2010, 2020 and NPDES flows). Results from these two months in each year are considered as lower and upper bounds for that year. The measured sea water profiles in February 2007 show a much weaker stratification than those in February of 2005 and 2006. The February 2007 profiles may represent the sea water conditions after a winter storm, where the sea water tends to be well mixed. To understand the behavior of the effluent plume under a stronger stratification in February, discharge scenarios 2 through 7 were also analyzed with the February 2006 sea water profiles.

The ocean is not only stratified, but it is also dynamic with waves and currents that change over time. However, an exhaustive analysis of the effect of waves and currents on the effluent plume was not pursued, as the effect of the project was primarily evaluated for stagnant conditions, making this a conservative analysis. To assess the impact of an ambient current, effluent plumes were analyzed for a 0.1 m/s steady current in addition to the zero flow condition.

The sizes of the diffuser ports range from 6.75 to 8.125 inch. Ocean outfalls are usually designed to have more or less uniform effluent flow from all ports. So in this analysis, it was assumed that the discharge rates of all diffuser ports are the same. The model Visual Plumes can only simulate diffusers with a single port size. To analyze the effluent from the 5-mile outfall, two Visual Plumes runs were conducted for each discharge and sea water profile: one run was conducted for a section of the diffuser with ten 6.75-inch ports and the other for a section with ten 8.125-inch ports. The behaviors of the plumes should be bounded by the results from these two model runs.

Results from Visual Plumes simulations are listed in Table 13. The results of the model analysis show that the analytical method provides very conservative estimates of the dilution.

4.5.4 Modeling Results

Complete Visual Plumes model results are summarized in Table 13. Compared with the stagnant flow conditions, a steady current of 0.1 m/s significantly increases the effluent dilutions and reduces the rising height of effluent plumes. The results clearly show that the stagnant flow conditions lead to conservative dilution scenarios.

Model results generally show that effluent plumes rise higher and achieve higher dilutions in February than in August. An exception is for the year 2005, where the plumes rose higher and achieved higher dilutions in August. A closer examination of the sea water profiles reveals that in August 2005, the strong stratification layer was located about 15-30 feet below sea surface. Below this layer, the stratification was much weaker, which allowed the plume to rise up to the base of this strongly stratified layer. The model results indicated that the diffuser achieved a greater level of dilution than the dilution ratio of 84:1 under the permit in all cases, even under the conservative assumption of no ambient current. The presence of a current significantly increases the initial dilution experienced by the HTP discharge.

Table 13. Results from Visual Plumes.

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
1	2005	332	cool	2005.02	0	6.75	76	53	167:1
2	2005	332	cool	2005.02	0.1	6.75	116	130	456:1
3	2005	332	cool	2005.02	0	8.125	71	42	164:1
4	2005	332	cool	2005.02	0.1	8.125	110	118	446:1
5	2005	332	warm	2005.08	0	6.75	56	53	210:1
6	2005	332	warm	2005.08	0.1	6.75	111	142	501:1
7	2005	332	warm	2005.08	0	8.125	52	41	206:1
8	2005	332	warm	2005.08	0.1	8.125	102	148	549:1
9	2007	288	cool	2007.02	0	6.75	0.7	49	381:1
10	2007	288	cool	2007.02	0.1	6.75	64	184	977:1
11	2007	288	cool	2007.02	0	8.125	1.1	37	372:1
12	2007	288	cool	2007.02	0.1	8.125	59	167	954:1
13	2007	288	cool	2006.02	0	6.75	78	48	169:1
14	2007	288	cool	2006.02	0.1	6.75	115	150	551:1
15	2007	288	cool	2006.02	0	8.125	72	37	169:1
16	2007	288	cool	2006.02	0.1	8.125	109	127	538:1
17	2007	288	warm	2007.08	0	6.75	93	45	142:1
18	2007	288	warm	2007.08	0.1	6.75	130	98	356:1
19	2007	288	warm	2007.08	0	8.125	88	35	140:1
20	2007	288	warm	2007.08	0.1	8.125	125	94	365:1
21	2010 w/o project	296.2	cool	2007.02	0	6.75	1	50	374:1
22	2010 with project	296.7	cool	2007.02	0	6.75	1	50	374:1
23	2010 w/o project	296.2	cool	2007.02	0.1	6.75	64	181	939:1
24	2010 with project	296.7	cool	2007.02	0.1	6.75	64	181	939:1
25	2010 w/o project	296.2	cool	2007.02	0	8.125	0	39	373:1
26	2010 with project	296.7	cool	2007.02	0	8.125	0	39	373:1
27	2010 w/o project	296.2	cool	2007.02	0.1	8.125	60	164	918:1
28	2010 with project	296.7	cool	2007.02	0.1	8.125	59	164	918:1

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
29	2010 w/o project	296.2	cool	2006.02	0	6.75	78	49	167:1
30	2010 with project	296.7	cool	2006.02	0	6.75	78	49	167:1
31	2010 w/o project	296.2	cool	2006.02	0.1	6.75	114	151	543:1
32	2010 with project	296.7	cool	2006.02	0.1	6.75	114	151	542:1
33	2010 w/o project	296.2	cool	2006.02	0	8.125	72	38	168:1
34	2010 with project	296.7	cool	2006.02	0	8.125	72	38	167:1
35	2010 w/o project	296.2	cool	2006.02	0.1	8.125	109	127	524:1
36	2010 with project	296.7	cool	2006.02	0.1	8.125	109	127	523:1
37	2010 w/o project	296.2	warm	2007.08	0	6.75	93	46	141:1
38	2010 with project	296.7	warm	2007.08	0	6.75	93	46	141:1
39	2010 w/o project	296.2	warm	2007.08	0.1	6.75	129	99	352:1
40	2010 with project	296.7	warm	2007.08	0.1	6.75	129	99	352:1
41	2010 w/o project	296.2	warm	2007.08	0	8.125	88	36	139:1
42	2010 with project	296.7	warm	2007.08	0	8.125	88	36	138:1
43	2010 w/o project	296.2	warm	2007.08	0.1	8.125	125	95	361:1
44	2010 with project	296.7	warm	2007.08	0.1	8.125	125	95	361:1
45	2020 w/o project	334.5	cool	2007.02	0	6.75	0	55	355:1
46	2020 with project	335.0	cool	2007.02	0	6.75	0	56	355:1
47	2020 w/o project	334.5	cool	2007.02	0.1	6.75	62	180	851:1
48	2020 with project	335.0	cool	2007.02	0.1	6.75	61	180	851:1
49	2020 w/o project	334.5	cool	2007.02	0	8.125	0	43	347:1

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
50	2020 with project	335.0	cool	2007.02	0	8.125	0	43	347:1
51	2020 w/o project	334.5	cool	2007.02	0.1	8.125	56	163	833:1
52	2020 with project	335.0	cool	2007.02	0.1	8.125	56	163	833:1
53	2020 w/o project	334.5	cool	2006.02	0	6.75	77	55	162:1
54	2020 with project	335.0	cool	2006.02	0	6.75	77	55	162:1
55	2020 w/o project	334.5	cool	2006.02	0.1	6.75	113	150	502:1
56	2020 with project	335.0	cool	2006.02	0.1	6.75	113	150	502:1
57	2020 w/o project	334.5	cool	2006.02	0	8.125	70	43	162:1
58	2020 with project	335.0	cool	2006.02	0	8.125	70	43	162:1
59	2020 w/o project	334.5	cool	2006.02	0.1	8.125	107	126	472:1
60	2020 with project	335.0	cool	2006.02	0.1	8.125	107	126	472:1
61	2020 w/o project	334.5	warm	2007.08	0	6.75	92	51	138:1
62	2020 with project	335.0	warm	2007.08	0	6.75	92	51	138:1
63	2020 w/o project	334.5	warm	2007.08	0.1	6.75	128	104	335:1
64	2020 with project	335.0	warm	2007.08	0.1	6.75	128	104	334:1
65	2020 w/o project	334.5	warm	2007.08	0	8.125	87	40	134:1
66	2020 with project	335.0	warm	2007.08	0	8.125	87	40	134:1
67	2020 w/o project	334.5	warm	2007.08	0.1	8.125	122	99	343:1
68	2020 with project	335.0	warm	2007.08	0.1	8.125	122	99	343:1
69	NPDES permitted flow	450	cool	2007.02	0	6.75	0	71	308:1

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
70	NPDES permitted flow	450	cool	2007.02	0.1	6.75	56	182	671:1
71	NPDES permitted flow	450	cool	2007.02	0	8.125	2	55	294:1
72	NPDES permitted flow	450	cool	2007.02	0.1	8.125	50	167	645:1
73	NPDES permitted flow	450	cool	2006.02	0	6.75	77	71	150:1
74	NPDES permitted flow	450	cool	2006.02	0.1	6.75	110	154	406:1
75	NPDES permitted flow	450	cool	2006.02	0	8.125	67	56	149:1
76	NPDES permitted flow	450	cool	2006.02	0.1	8.125	104	130	375:1
77	NPDES permitted flow	450	warm	2007.08	0	6.75	92	65	130:1
78	NPDES permitted flow	450	warm	2007.08	0.1	6.75	124	117	295:1
79	NPDES permitted flow	450	warm	2007.08	0	8.125	85	52	125:1
80	NPDES permitted flow	450	warm	2007.08	0.1	8.125	117	111	300:1

Table 14 presents a subset of the Visual Plumes modeling results for selected runs along with differences between dilution results to facilitate comparisons between runs and to highlight the relative impact of the project on future discharge levels for each given discharge scenario.

Table 14. Differences between selected Visual Plumes runs.

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
21	2010 w/o project	296.2	cool	2007.02	0	6.75	1	50	374:1
22	2010 with project	296.7	cool	2007.02	0	6.75	1	50	374:1
								Project effect on 2010 dilution	0.0 %
23	2010 w/o project	296.2	cool	2007.02	0.1	6.75	64	181	939:1
24	2010 with project	296.7	cool	2007.02	0.1	6.75	64	181	939:1
								Project effect on 2010 dilution	0.0 %
25	2010 w/o project	296.2	cool	2007.02	0	8.125	0	39	373:1
26	2010 with project	296.7	cool	2007.02	0	8.125	0	39	373:1
								Project effect on 2010 dilution	0.0 %
27	2010 w/o project	296.2	cool	2007.02	0.1	8.125	60	164	918:1
28	2010 with project	296.7	cool	2007.02	0.1	8.125	59	164	918:1
								Project effect on 2010 dilution	0.0 %
29	2010 w/o project	296.2	cool	2006.02	0	6.75	78	49	167:1
30	2010 with project	296.7	cool	2006.02	0	6.75	78	49	167:1
								Project effect on 2010 dilution	0.0 %
31	2010 w/o project	296.2	cool	2006.02	0.1	6.75	114	151	543:1
32	2010 with project	296.7	cool	2006.02	0.1	6.75	114	151	542:1
								Project effect on 2010 dilution	0.2 %
33	2010 w/o project	296.2	cool	2006.02	0	8.125	72	38	168:1
34	2010 with project	296.7	cool	2006.02	0	8.125	72	38	167:1
								Project effect on 2010 dilution	0.6 %
35	2010 w/o project	296.2	cool	2006.02	0.1	8.125	109	127	524:1
36	2010 with project	296.7	cool	2006.02	0.1	8.125	109	127	523:1

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
								Project effect on 2010 dilution	0.2 %
37	2010 w/o project	296.2	warm	2007.08	0	6.75	93	46	141:1
38	2010 with project	296.7	warm	2007.08	0	6.75	93	46	141:1
								Project effect on 2010 dilution	0.0 %
39	2010 w/o project	296.2	warm	2007.08	0.1	6.75	129	99	352:1
40	2010 with project	296.7	warm	2007.08	0.1	6.75	129	99	352:1
								Project effect on 2010 dilution	0.0 %
41	2010 w/o project	296.2	warm	2007.08	0	8.125	88	36	139:1
42	2010 with project	296.7	warm	2007.08	0	8.125	88	36	138:1
								Project effect on 2010 dilution	0.7 %
43	2010 w/o project	296.2	warm	2007.08	0.1	8.125	125	95	361:1
44	2010 with project	296.7	warm	2007.08	0.1	8.125	125	95	361:1
								Project effect on 2010 dilution	0.0 %
45	2020 w/o project	334.5	cool	2007.02	0	6.75	0	55	355:1
46	2020 with project	335.0	cool	2007.02	0	6.75	0	56	355:1
								Project effect on 2020 dilution	0.0 %
47	2020 w/o project	334.5	cool	2007.02	0.1	6.75	62	180	851:1
48	2020 with project	335.0	cool	2007.02	0.1	6.75	61	180	851:1
								Project effect on 2020 dilution	0.0 %
49	2020 w/o project	334.5	cool	2007.02	0	8.125	0	43	347:1
50	2020 with project	335.0	cool	2007.02	0	8.125	0	43	347:1
								Project effect on 2020 dilution	0.0 %
51	2020 w/o project	334.5	cool	2007.02	0.1	8.125	56	163	833:1
52	2020 with project	335.0	cool	2007.02	0.1	8.125	56	163	833:1
								Project effect on 2020 dilution	0.0 %

Run No.	Discharge scenario	Discharge flow (mgd)	Season	Sea water profile	Currents (m/s)	Port diameter (inch)	Plume top (ft below sea surface)	Horizontal distance from diffuser at plume top (ft)	Dilution
53	2020 w/o project	334.5	cool	2006.02	0	6.75	77	55	162:1
54	2020 with project	335.0	cool	2006.02	0	6.75	77	55	162:1
Project effect on 2020 dilution									0.0 %
55	2020 w/o project	334.5	cool	2006.02	0.1	6.75	113	150	502:1
56	2020 with project	335.0	cool	2006.02	0.1	6.75	113	150	502:1
Project effect on 2020 dilution									0.0 %
57	2020 w/o project	334.5	cool	2006.02	0	8.125	70	43	162:1
58	2020 with project	335.0	cool	2006.02	0	8.125	70	43	162:1
Project effect on 2020 dilution									0.0 %
59	2020 w/o project	334.5	cool	2006.02	0.1	8.125	107	126	472:1
60	2020 with project	335.0	cool	2006.02	0.1	8.125	107	126	472:1
Project effect on 2020 dilution									0.0 %
61	2020 w/o project	334.5	warm	2007.08	0	6.75	92	51	138:1
62	2020 with project	335.0	warm	2007.08	0	6.75	92	51	138:1
Project effect on 2020 dilution									0.0 %
63	2020 w/o project	334.5	warm	2007.08	0.1	6.75	128	104	335:1
64	2020 with project	335.0	warm	2007.08	0.1	6.75	128	104	334:1
Project effect on 2020 dilution									0.3 %
65	2020 w/o project	334.5	warm	2007.08	0	8.125	87	40	134:1
66	2020 with project	335.0	warm	2007.08	0	8.125	87	40	134:1
Project effect on 2020 dilution									0.0 %
67	2020 w/o project	334.5	warm	2007.08	0.1	8.125	122	99	343:1
68	2020 with project	335.0	warm	2007.08	0.1	8.125	122	99	343:1
Project effect on 2020 dilution									0.0 %

As the project effect percentages in Table 14 suggest, model results show that there is almost no change in effluent plume behavior for discharges with and without the added project flow. The maximum change in effluent dilution between the project and no project cases is less than 0.7 percent, which is within the computational uncertainty of the model and within the high degree of dilution variability that occurs from year-to-year and season-to-season. In other words, the computed dilution values are essentially identical. Therefore, the impact on dilution due to the addition of flow increment from Proposed Project would be minimal. Moreover, taking into account future flows, all modeled scenarios resulted in dilutions at the edge of the Zone of Initial Dilution significantly greater than the 84:1 dilution specified in the HTP NPDES permit. The lowest modeled dilution was 125:1 (run number 79 in Table 13). Thus, according to each of the models, discharges from the HTP (with or without the Proposed Project) into the Bay achieve a dilution ratio greater than 84:1. Therefore, constituent concentrations at the edge of the zone of initial dilution should not exceed Ocean Plan water quality objectives (or NPDES permit limits).

5.0 ASSESSMENT OF PROJECT IMPACTS

The NPDES permit issued by the LARWQCB and USEPA for the HTP includes requirements and limitations that implement the objectives of the Basin Plan and the Ocean Plan, and thus that protect the beneficial uses of the Bay as well as public health. (Refer to Section 2.2 of this report.) The permit also incorporates other applicable federal and state laws and regulations aimed at protecting water quality, the marine environment, and public health. Effluent limitations in the NPDES permit are such that water quality objectives outside of the zone of initial dilution will be attained if the discharged wastewater from HTP's five-mile outfall achieves the dilution ratio of 84:1.

The HTP NPDES permit was augmented in calendar years 1999-2000 to mandate additional secondary treatment process, including the addition of multiple oxygen activated sludge modules and secondary clarifiers to achieve high quality effluent. These NPDES permit limits led to the installation of a number of improvements to the Hyperion facility. Data are now available that confirm that these facility upgrades to the Hyperion facility have led to actual improvement to the marine environment. Specifically, the abundance of observed benthic macrofaunal species, trawl-caught fish, and invertebrate communities has increased, and in 2005 the greatest number of species occurred in the Zone of Initial Dilution (CLA-EMD 2007a). Although effects on the distribution of organisms around the vicinity of Hyperion's five-mile outfall are still detectable, these effects are restricted to a much smaller area than historically recorded, suggesting the spatial footprint of impacts is diminishing. None of the seven endangered species residing in the Santa Monica Bay are impacted by the secondary treated HTP effluent.

Even with the addition of wastewater generated by the Proposed Project and other future flows, effluent from HTP is expected to be in compliance with the requirements of the NPDES permit. Almost no change in effluent plume behavior is expected for discharges with and without the added project flow. The maximum change in effluent dilution between the project and no project cases is less than 0.7 percent. Moreover, taking into account all future projected flows, the lowest modeled dilution was 125:1. Because this ratio is well above the 84:1 ratio specified in the NPDES permit, the additional discharges

from HTP associated with future wastewater flow will have a less than significant impact on water quality in the Bay.

The data also confirm that the treated wastewater discharged from the Hyperion facility does not affect the quality of the water nearest the shoreline, thereby not affecting the public's health or enjoyment of the ocean. Additionally, the physical and/or biological effects associated with the incremental increase in wastewater discharge due to the Proposed Project and other associated projects will be minimal. Thus, we conclude that recovery and improvements of the physical and biological characteristics of Santa Monica Bay will continue.

As the modeling results confirm, discharges from HTP are diluted rapidly upon discharge, so that concentrations of major constituents of concern are below water quality objectives at the edge of the Zone of Initial Dilution (i.e., near the diffuser, and far from the shoreline). Shoreline and nearshore/inshore water quality monitoring conducted by the City of Los Angeles since the 1940s indicates that effluent from the HTP five-mile outfall does not reach the shoreline (LARWQCB 2005, p. F-13). The additional increase in wastewater from the Proposed Project, in combination with future projected wastewater flows, will not change the quality of the HTP effluent, and the modeling indicates that the impacts of the Proposed Project, individually or cumulatively, to aquatic resources and public health in Santa Monica Bay (with or without the Proposed Project) will be less than significant.

The conclusions of this report are based on modeling of the future discharge of treated wastewater from HTP, which indicates that the dilution ratio specified in the HTP NPDES permit will continue to be met or exceeded. In addition, the limitations and requirements in the HTP NPDES permit were formulated to be protective of the public health, the marine environment and the beneficial uses of the Bay, and the facility upgrades implemented at the HTP have led to improvement of the marine environment in the Bay. Finally, no adverse effects at the shoreline can be attributed to the effluent plume associated with discharges from HTP's five-mile outfall. For these reasons, the Proposed Project would not cause a significant impact individually or cumulatively to the quality of the waters in the Bay.

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APPENDIX C.iv:
WASTE DISCHARGE REQUIREMENTS AND AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM FOR THE CITY OF LOS ANGELES (HYPERION TREATMENT PLANT), ORDER NO. R4-2005-0020, NPDES PERMIT NO. CA0109991, CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION AND U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX, REVISED APRIL 7, 2005

California Regional Water Quality Control Board
Los Angeles Region
and
U.S. Environmental Protection Agency
Region IX

ORDER NO. R4-2005-0020
NPDES PERMIT NO. CA0109991

Waste Discharge Requirements
and
Authorization to Discharge Under the
National Pollutant Discharge Elimination System

for the

City of Los Angeles
(Hyperion Treatment Plant)

September 21, 2004
Revised: April 7, 2005

TABLE OF CONTENTS

FINDINGS **PAGE**

Purpose of Order ---- 1
Consent Decree and other Legal Issues ---- 2
Hyperion Treatment System, Service Area, and Wastewater Collection System ---- 3
Description of The Hyperion Treatment Plant ---- 5
Description of Outfalls ---- 6
Discharge Quality Description ---- 7
Description of Receiving Water ---- 9
Applicable Laws, Plans, Policies and Regulations ---- 11
Basis for Effluent and Receiving Water Limits and Other Discharge Requirements - 13
Reasonable Potential Analysis (RPA) ---- 18
Performance Goals ---- 22
Petition and CEQA Requirements ---- 24

I. DISCHARGE REQUIREMENTS ---- 25
A. Effluent Limitations and Performance Goals ---- 25
B. Mass Emission Caps ---- 36
C. Receiving Water Limitations ---- 37

II. BIOSOLIDS REQUIREMENTS ---- 39

III. PRETREATMENT REQUIREMENTS ---- 40

IV. PROHIBITIONS ---- 41

V. PROVISIONS ---- 42

VI. REOPENERS AND MODIFICATION ---- 47

VII. EXPIRATION DATE ---- 48

VIII. RESCISSION ---- 48

FIGURES:

1. Location Map
2. Hyperion Service Area Map
3. A Schematic Presentation of the Hyperion Treatment Plant's Wastewater Flow

ATTACHMENTS:

A. Storm Water Pollution Prevention Plan
B. Biosolids/Sludge Management
C. TRE Requirements
F. Fact Sheet including:
- Tables R1-1 and R1-2 - Reasonable Potential Analysis Tables (Outfall 001)
- Tables R2-1 and R2-2 - Reasonable Potential Analysis Tables (Outfall 002)

P. Pretreatment Reporting Requirements
S. Standard Provisions
T. Monitoring and Reporting Program (CI-1492)

State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
AND
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IX

ORDER NO. R4-2005-0020
NPDES PERMIT NO. CA0109991

WASTE DISCHARGE REQUIREMENTS AND AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM FOR THE CITY OF LOS ANGELES (Hyperion Treatment Plant)

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) and the Regional Administrator, U.S. Environmental Protection Agency, Region IX (USEPA), find:

PURPOSE OF ORDER

1. The City of Los Angeles (City or Discharger) owns and operates the Hyperion Treatment Plant which discharges disinfected (outfall 001) /undisinfected (outfall 002) secondary treated municipal wastewater to the Pacific Ocean within Santa Monica Bay, a water of the United States. The discharge is regulated under waste discharge requirements (WDRs) contained in Order No. 94-021, adopted by the Regional Board on February 28, 1994. Order No. 94-021 also serves as the National Pollutant Discharge Elimination System (NPDES) permit (CA0109991) issued jointly by the Regional Board and USEPA on April 1, 1994. Order No. 94-021 has an expiration date of March 10, 1999.

2. Section 122.6, Title 40, Code of Federal Regulations (40 CFR) and section 2235.4, Title 23, California Code of Regulations (CCR), state that an expired permit continues in force until the effective date of a new permit, provided the permittee has timely submitted a complete application for a new permit. On March 8, 1999, the City filed a report of waste discharge (ROWD) and applied for renewal of its WDRs and NPDES permit. Therefore, the Discharger's permit has been administratively extended until the Regional Board and USEPA act on the new WDRs and permit.

3. This Order is the reissuance of WDRs and NPDES permit for the Hyperion Treatment Plant.

4. USEPA and the Regional Board have classified Hyperion Treatment Plant as a major discharger. It has a Threat to Water Quality and Complexity rating of 1-A pursuant to CCR, Title 23, section 2200.

CONSENT DECREE AND OTHER LEGAL ISSUES

5. The operations and discharges from the Hyperion Treatment Plant and Hyperion collection system are also regulated under the following enforcement actions:

   a. Amended Consent Decree entered on February 19, 1987, in United States and State of California v. City of Los Angeles, No. CV 77-3047-HP (C.D. Cal.);

   b. Settlement Agreement, Los Angeles Superior Court Case No. C 665238, dated January 29, 1990, in State of California v. City of Los Angeles; and

   c. Regional Board Cease and Desist Order 98-073 adopted on September 14, 1998, amended by Order No. 00-128 adopted on August 31, 2000.

6. In 1987, the City entered into an Amended Consent Decree (No. CV 77-3047-HP) with USEPA and the Regional Board. The Amended Consent Decree required the City under time schedules to undertake the following:

   a. Eliminate the discharge of sewage sludge into the Pacific Ocean from Hyperion Treatment Plant by December 31, 1987 (status: completed);

   b. Comply with interim effluent limits (status: interim limits are not applicable as of January 1, 1999);

   c. Complete construction and begin operation of the Hyperion Energy Recovery System by June 30, 1989 (status: completed, but determined to be a technological failure and abandoned);

   d. Achieve and thereafter maintain compliance with full secondary treatment at Hyperion Treatment Plant by December 31, 1998 (status: completed and achieved compliance before the deadline);

   e. Prepare a storm water pollution reduction study and implement the recommended measures thereof (status: completed).

7. On June 7, 1991, the United States and the State of California filed a supplemental complaint under the existing Consent Decree CV 77-3047-HP (C.D. Cal.) for alleged pretreatment violations against the City. Settlement of the complaint had been concluded and modification to the Consent Decree was entered into court records on August 7, 2000. The settlement requires the City to implement the Westside Water Recycling Extension Project and the Santa Monica Bay Storm Drain Low-Flow Diversion Project.

8. In October 1987, the California Attorney General, on behalf of the Regional Board, filed a complaint with the Los Angeles Superior Court (Case No. C 665238) for civil penalties regarding unpermitted discharges to Discharge Serial No. 001 and raw sewage overflows to surface waters from the Hyperion collection system. A settlement agreement was entered into on January 29, 1990. In lieu of civil penalties, the City was required to implement 23 projects to improve and enhance its collection system and benefit the waters in the Greater Los Angeles Area. Twenty two of the 23 Settlement Agreement projects were completed.

The remaining project deals with the Los Angeles Zoo Wastewater Treatment Facility. Two of the original three elements of the Zoo project (construction of the retention basin and pump station for collection of the Zoo's wastewater and diversion to the North Outfall Sewer force main) were completed in 1995. The City proposes to substitute Best Management Practices (BMPs) for the storm water peripheral drainage system, the third element of the original design concept. After reviewing the study, the Regional Board rejected the City's proposal because the proposed BMPs can not achieve the objectives of the original Settlement Agreement. Currently, the City is in the process of developing other options for the Regional Board's consideration.

9. Sanitary sewer overflows (SSO) have been a recurring problem in certain areas of the City; in particular, in the South Central area, where sewers do not have adequate capacity to absorb inflow and infiltration that occurs during wet weather. For the entire City, between the wet weather period of February 3, 1998, through May 14, 1998, there were 99 separate sanitary overflows resulting in 44 million gallons of raw sewage released. On September 14, 1998, the Regional Board issued Cease and Desist Order (CDO) No. 98-073 to the City, amended by CDO No. 00-128 adopted on August 31, 2000. The CDO requires the City to provide adequate capacity to its wastewater collection system by constructing additional sewer alignments and/or upgrading the existing sewer system over a seven-year period (1998 to 2005). Additionally, on August 5, 2004, the United States, the State of California, Santa Monica Baykeeper, a coalition of community groups and the City of Los Angeles lodged a settlement that would resolve the parties' Clean Water Act and Porter-Cologne Act litigation regarding the City of Los Angeles' SSOs and sewage odors. This settlement underwent public review and comment. The Settlement Agreement and Final Order was filed on October 28, 2004 and entered by the District Court on October 29, 2004, and is now being implemented. The Settlement Agreement and Final Order establishes a ten-year program designed to reduce SSOs and sewage odors to the maximum extent feasible.

HYPERION TREATMENT SYSTEM, SERVICE AREA, AND WASTEWATER COLLECTION SYSTEM

10. The Hyperion Treatment Plant is located at 12000 Vista del Mar Boulevard, Playa Del Rey, California (see Figure 1, Location Map). It is part of a joint outfall system commonly known as the Hyperion Treatment System which consists of the wastewater collection system, the Hyperion Treatment Plant, and three upstream wastewater treatment plants: Donald C. Tillman Water Reclamation Plant (Tillman WRP), Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and Burbank Water Reclamation Plant (Burbank WRP)(owned and operated by a contract city). The Hyperion Treatment System collects, treats, and disposes of sewage from the entire City (except the Wilmington - San Pedro Area, the strip north of San Pedro, and Watts) and from a number of cities and agencies (Contract Cities and Agencies, see below) under contractual agreements. Approximately 85% of the sewage and commercial/industrial wastewater comes from the City of Los Angeles. The remaining 15% comes from the Contract Cities and Agencies. There are approximately four million people in the Hyperion Treatment System Service Area (see Figure 2, Hyperion Service Area Map).

CONTRACT CITIES AND AGENCIES

a. Aneta Street Tax Zone
b. Army Reserve Center
c. Army Reserve Training
d. Barrington Post Office
e. City of Beverly Hills
f. City of Burbank
g. California National Guard (Federal Avenue Armory)
h. L.A. County Sanitation District #4 (W. Hollywood)
i. L.A. County Sanitation District #5 (Inglewood)
j. L.A. County Sanitation District #9 (Terminal Island)
k. L.A. County Sanitation District #16 (Alhambra, Pasadena, S. Pasadena)
l. L.A. County Sanitation District #27 (Sunset Mesa)
m. City of Culver City
n. City of El Segundo
o. Federal Office Building
p. City of Glendale
q. Karl Holton Camp
r. Las Virgenes Municipal Water District
s. Marina Del Rey
t. City of Long Beach
u. City of San Fernando
v. City of Santa Monica
w. Triunfo County Sanitation District
x. Universal City
y. Veterans Memorial Park
z. Veterans Administration – Sawtelle
aa. West Los Angeles Community College

11. Currently, the Hyperion Treatment Plant also accepts dry weather urban runoff that is diverted from storm drains into the City's collection system from April 1 to October 31. The City plans to extend this diversion operation from the dry summer months to year-round in order to conform to the six-year compliance schedule for bacteria concentration during winter dry weather, contained in the Santa Monica Bay Beach Dry-weather Bacteria TMDL regulation (Resolution No. 02-004 and Resolution No. 2002-022) adopted by the Regional Board.

12. The Hyperion Treatment System is an interconnected system and includes approximately 6,500 miles of sewer lines located within the City (including trunk sewers in contract cities and agencies) and additional sewer lines under the control of the contract cities and agencies. Sludge from the City's two upstream plants is returned to the wastewater collection system and flows to the Hyperion Treatment Plant for treatment. Discharges from Tillman WRP and LAGWRP are regulated by Order No. 98-046 (NPDES Permit No. CA0056227) and Order No. 98-047 (NPDES Permit No. CA0053953), respectively. In addition, sludge generated from the Burbank WRP is also returned to the City of Burbank sewer system for treatment at the Hyperion Treatment Plant. The influent to the Burbank WRP can be diverted/bypassed to the Hyperion Treatment Plant during periods of emergency. Discharges from the Burbank WRP are regulated under Order No. 98-052 (NPDES CA0055531).

13. The Contract Cities and Agencies operate their respective collection systems that are tributary to the City's main trunk lines. Some contract cities and agencies also operate their own nondomestic source control programs.

DESCRIPTION OF THE HYPERION TREATMENT PLANT

14. The Hyperion Treatment Plant has a dry weather average design treatment capacity of 450 million gallons per day (mgd) and a wet weather peak hydraulic capacity of approximately 850 mgd. In 2003, the Hyperion Treatment Plant received an average of 339 mgd of influent and discharged an average of 315 mgd of secondary effluent to the ocean. Approximately 24 mgd of secondary effluent was sent to West Basin Water Recycling Facility for advanced treatments.

15. The Hyperion Treatment Plant has provided full secondary treatment since December 1998. Preliminary and primary wastewater treatments consist of screening, grit removal, and primary sedimentation with coagulation and flocculation. In secondary treatment, the primary effluent is biologically treated in a high purity oxygen activated sludge process comprised of a cryogenic oxygen plant, 9 secondary reactor modules and 36 secondary clarifiers. Each secondary reactor module is designed to handle 50 mgd of flow which results in a total treatment capacity of 450 mgd of primary effluent. After clarification, undisinfected secondary effluent is discharged into Santa Monica Bay through a five mile submerged outfall pipe (see below for description). Discharge up to 325 mgd flows by gravity to the outfall, or is pumped at the Effluent Pumping Plant when flows exceed 325 mgd.

    Solid fractions recovered from wastewater treatment processes include grit, primary screenings, primary sludge and skimmings, thickened waste activated sludge, digested sludge screenings and digester cleaning solids. The fine solids (grit, primary screenings, digested sludge screenings, digester cleaning solids) that consist of primarily inorganic materials are hauled away to landfills. The remaining solid fractions (primary sludge and skimmings, thickened waste activated sludge) are anaerobically digested onsite. The digested solids are screened and dewatered using centrifuges. Starting on January 1, 2003, the Hyperion Treatment Plant implemented full thermophilic digestion to generate Class A "EQ" biosolids. The biosolids (treated sewage sludge) are beneficially reused offsite for land application and composting projects. The digester gas is cleaned and a major part of the gas is currently exported to the Los Angeles Department of Water and Power's Scattergood Steam Generating Plant, located immediately adjacent to the Hyperion Treatment Plant. The exported digester gas is used as fuel in the generation of electricity. In return, the generating plant provides steam for digester heating for the Hyperion Treatment Plant. During interruptions in the export of steam from the DWP Scattergood Steam Generation Plant, digester gas can be used as fuel for in-plant boilers that provide steam to heat the anaerobic digesters. Any remaining non-exported digester gas may be flared, if necessary, and is regulated under a flare operation permit from the South Coast Air Quality Management District (AQMD).

    A schematic of the Hyperion Treatment Plant's wastewater flow is presented in Figure 3.

16. ***Water Reclamation -*** The West Basin Municipal Water District (West Basin) operates the West Basin Water Recycling Facility (West Basin Facility) in El Segundo. West Basin is contractually entitled to receive up to 70 mgd of secondary effluent from Hyperion Treatment

Plant for advanced treatment. West Basin Facility provides tertiary treatment and/or advanced treatments such as microfiltration and reverse osmosis (RO) to the Hyperion secondary effluent to produce Title 22 and high purity recycled water. Title 22 recycled water is used for beneficial irrigation, industrial applications including cooling water and boiler feed water, and other purposes. The RO treated recycled water is primarily injected into the West Coast Basin Barrier Project to control seawater intrusion. In 2003, West Basin Facility received approximately an average of 24 mgd of secondary effluent from the Hyperion Treatment Plant.

The waste brine from West Basin Facility is discharged to the ocean through Hyperion's five-mile outfall (Discharge Serial No. 002) via a waste brine line from West Basin Facility. Although the waste brine is discharged through Hyperion's outfall, it is regulated under separate waste discharge requirements and NPDES permit.

17. The Hyperion Treatment Plant ceased the irrigation use of in-plant chlorinated secondary treated wastewater in July 1999. Instead, the plant started using tertiary recycled water from West Basin in August 1999.

DESCRIPTION OF OUTFALLS

18. The Hyperion Treatment Plant has three ocean outfalls. However, only two outfall discharge points (i.e., 001 and 002) are utilized to discharge treated wastes to the Pacific Ocean. The three ocean outfalls are described as follows:

Discharge Serial No. 001 - this is commonly referred to as the "one-mile outfall". It is a 12-foot diameter outfall terminating approximately 5,364 feet (1.6 kilometers [km]) west-southwest of the treatment plant at a depth of approximately 50 feet (15 meters [m]) below the ocean surface (Latitude: 33° 55.095; Longitude 118° 26.844). This outfall is permitted for emergency discharge of chlorinated secondary treated effluent during extremely high flows, power failures, and preventive maintenance, such as routine opening and closing the outfall gate valve(s) for exercising and lubrication. However, during intense storms or storms associated with plant power outages, direct discharge of undisinfected storm water overflow is also permitted at this outfall. This Order and permit require the City to notify the Regional Board and USEPA in advance of any planned preventive maintenance that results in discharges through Discharge Serial No. 001.

Discharge Serial No. 002 - this is commonly referred to as the "five-mile outfall". It is a 12-foot diameter outfall terminating approximately 26,525 feet (8.1 km) west-southwest of the treatment plant at a depth of approximately 187 feet (57 m) below the ocean surface. This outfall is located north of Discharge Serial No. 001 and ends in a "Y" shaped diffuser consisting of two 3,840-foot legs (Latitude: 33° 54.718; Longitude: 118° 31.287) (North terminus of wye structure – Latitude 33° 55.160 and Longitude 118° 31.709; South terminus of wye structure – Latitude 33° 54.039 and Longitude 118° 31.636). This is the only outfall permitted for the routine discharge of undisinfected secondary treated effluent.

Discharge Serial No. 003 – this is a 20-inch diameter outfall terminating approximately 35,572 feet (10.8 km) west of the treatment plant, at the head of a submarine canyon at a depth of approximately 300 feet (91 m) below the ocean surface (Latitude: 33° 55.622, Longitude: 118° 33.183). This outfall had been used to discharge sludge. Under the 1987

amended Consent Decree No. CV77-3047-HP, this outfall was deactivated in November 1987 when sludge discharge to the ocean was terminated. Near the head of this outfall, a spool piece was removed and the discharge pipe was blind-flanged to prevent any possible discharge of sewage or sludge into the Pacific Ocean. The outfall has not been maintained since it was taken out of service. Any discharge from this outfall is prohibited.

DISCHARGE QUALITY DESCRIPTION

19. The effluent characteristics, shown in the following Table 1, are based on data in the Discharger's 2003 annual summary report submitted to the Regional Board and USEPA. Only pollutants that were detected are shown below. Nondetected pollutants and the detection limits are given in the Fact Sheet.

Table 1. Effluent Characteristics for Year 2003

Constituent	Unit	Average or Median *	Maximum	Minimum
Flow	mgd	315	466	268
pH	pH units	6.8	7.3	6.4
Temperature	°F	79	85	--
BOD_5 20°C	mg/L	18	24**	--
Suspended solids	mg/L	19	27**	--
Total organic carbon	mg/L	46	20	--
Total phosphorus	mg/L	2.5	3.2	--
Turbidity	NTU	8	12	--
Oil and grease	mg/L	< 3	4	--
Dissolved oxygen	mg/L	5.6	7.3	--
Organic-N	mg/L	3.7	5.6	--
Nitrate-N	mg/L	0.020	0.076	--
Marine Aquatic Life Toxicants				
Arsenic	ug/L	2.6	5.0	1.1
Cadmium	ug/L	< 0.08	0.16	< 0.08
Chromium (VI)	ug/L	< 2	4	< 2
Copper	ug/L	14	19	10
Lead	ug/L	< 3	4.5	< 2
Mercury	ug/L	< 0.002	0.18	< 0.002
Nickel	ug/L	9.4	12	6.1
Selenium	ug/L	1.1	2	0.24
Silver	ug/L	0.8	1.8	0.6
Zinc	ug/L	18	24	12
Cyanide	ug/L	< 4	6	< 2
Ammonia-N	mg/L	35	37	32
Acute toxicity	TUa	0.6	1.1	0
Chronic toxicity	TUc	25	48	10
Phenolic compounds (non-chlorinated)	ug/L	< 4	1.9	< 4
Phenolic compounds (chlorinated)	ug/L	< 0.4	0.46	< 0.4

Constituent	Unit	Average or Median *	Maximum	Minimum
Endrin	ug/L	< 0.007	0.009	< 0.007
HCH (sum of the following)	ug/L	< DL	0.006	< DL
alpha-BHC	ug/L	< 0.0023	< 0.0023	< 0.0023
beta-BHC	ug/L	< 0.0019	< 0.0019	< 0.0019
gamma-BHC (Lindane)	ug/L	< 0.0020	0.006	< 0.0020
delta-BHC	ug/L	< 0.0007	< 0.0007	< 0.007
Human Health Toxicants – Noncarcinogens				
Antimony	ug/L	< 1.3	2	< 1.3
Di-n-butyl phthalate	ug/L	< 0.07	0.77	< 0.07
Dichlorobenzenes	ug/L	< 0.06	0.17	< 0.06
Fluoranthene	ug/L	< 0.06	0.18	< 0.06
Thallium	ug/L	< 0.3	0.68	< 0.3
Toluene	ug/L	0.23	0.78	< 0.08
Tributyltin	ug/L	< 3.2	10	< 2
Human Health Toxicants – Carcinogens				
Beryllium	ug/L	< 0.01	0.17	< 0.006
Bis(2-ethylhexyl)phthalate	ug/L	2.9	6.4	0.88
Chlorodibromomethane	ug/L	1.4	2.4	0.81
Chloroform	ug/L	5.8	7.1	3.7
1,4-Dichlorobenzene	ug/L	2.2	5.3	< 0.07
Dichlorobromomethane	ug/L	1.2	1.6	0.93
Methylene chloride	ug/L	3.3	5.4	1.7
Halomethanes (sum of the following)	ug/L	< DL	1.1	< DL
Methyl chloride (Chloromethane)	ug/L	< 0.14	< 0.18	< 0.14
Methyl bromide (Bromomethane)	ug/L	< 0.28	< 0.28	< 0.16
Bromoform	ug/L	< 0.19	1.1	< 0.08
Isophorone	ug/L	0.15	0.21	< 0.07
PAHs (sum of the following)	ug/L	< DL	1.6	< DL
Acenaphthylene	ug/L	< 0.06	< 0.06	< 0.06
Anthracene	ug/L	< 0.06	0.16	< 0.06
Benzo(a) anthracene	ug/L	< 0.09	0.28	< 0.09
Benzo(b) fluoranthene	ug/L	< 0.07	0.13	< 0.07
Benzo(k) fluoranthene	ug/L	< 0.19	0.21	< 0.19
1,12-Benzoperylene	ug/L	< 0.05	< 0.05	< 0.05
Benzo(a) pyrene	ug/L	< 0.06	< 0.06	< 0.06
Chrysene	ug/L	< 0.05	0.19	< 0.05
Dibenzo(a,h)anthracene	ug/L	< 0.05	< 0.05	< 0.05
Fluorene	ug/L	< 0.05	0.18	< 0.05
Indeno(1,2,3-cd) pyrene	ug/L	< 0.07	< 0.07	< 0.07
Phenanthrene	ug/L	< 0.08	0.23	< 0.08
Pyrene	ug/L	< 0.07	0.2	< 0.07
Tetrachloroethylene	ug/L	1.7	2.4	0.96

Footnotes

The "<" symbol indicates that the pollutant was not detected at that concentration level.
DL represents detection limit for a group of compounds.
* When a data set contains nondetected data, the median value of the data set is reported.
** Data are weekly average.

20. **Discharge Plume** – The City has collected and assessed extensive chemical and physical data from Santa Monica Bay, including (since 1987) over 6 years of weekly water quality assessments, approximately 4 years of monthly assessments, and approximately 4 years of quarterly assessments. Data collection has taken place at 36 sites (12 nearshore stations and 24 offshore stations) throughout Santa Monica Bay during all weather conditions, including El Niño, La Niña and winter storm conditions. The parameters collected in these assessments are used to locate and define the geometry of the wastewater plume and include transmissivity, dissolved oxygen, temperature and salinity.

    The movement of the plume is dictated by the depth of the thermocline or stratification and the direction and strength of highly variable Santa Monica Bay currents. Under typical conditions, the plume is detected within 2 km (6562 feet) of the outfall terminus, although it has been detected as far as 8 km (26247 feet) away from the outfall. Also, the plume has almost always been detected below the thermocline at a depth ranging from 10 m (33 feet) to 55 m (180 feet). Infrequently, during winter storm conditions, the plume has been detected at the surface in the vicinity of the outfall. On rare occasions, it has been impossible to detect the plume.

    As the waters of Santa Monica Bay approach the shore, the thermocline intersects the rising sea bottom. This point is typically 1000 m (3281 feet) or more offshore and is the theoretical limit of the approach of the plume to the shoreline. The plume has never been detected less than 2.5 km (8202 feet) from shore, at the 45 m (148 feet) depth contour.

21. The City has conducted shoreline and nearshore/inshore water quality monitoring in Santa Monica Bay since the late 1940s. The monitoring results indicated that effluent from Hyperion's five-mile outfall does not reach the shoreline and that elevated bacterial counts are associated with runoff from storm drains and discharges from piers. The direct impacts of the discharge from Hyperion's one-mile outfall on shoreline water quality have not been studied due to the lack of routine discharge. However, it is expected to be very minimal in that effluent discharged from the one-mile outfall is disinfected, and the volume of the discharge is usually much less than five million gallons occurring at most quarterly. This discharge is intended for conducting a functional test of equipment.

    Shoreline monitoring requirements have been transferred to the monitoring program of the municipal storm water for the City (Order No. 01-182, NPDES No. CAS004001) adopted by this Regional Board on December 13, 2001.

DESCRIPTION OF RECEIVING WATER

22. The receiving water into which the Hyperion Treatment Plant discharges is part of the Santa Monica Bay watershed. The watershed is home to unique wetland, sand dune, and open ocean ecosystems that support a rich diversity of wildlife and serve as migration stopovers for marine mammals and birds. The Bay and its beaches are invaluable recreational resources

and important sources of revenue for the region. The Bay is heavily used for fishing, swimming, surfing, diving, and other activities classified as water contact and noncontact recreation.

Over the years, the beneficial uses of the Bay have been impaired to various degrees due to pollution, resource over-exploitation, and habitat destruction. The primary problems of concern include acute health risk associated with swimming in runoff-contaminated surfzone waters, chronic (cancer) risk associated with consumption of certain sport fish species in areas impacted by DDT and PCB contamination, pollutant loading from point sources, urban runoff, and other nonpoint sources in light of projected population increases and their impacts on marine ecosystem, health of fishery resources, and degradation of natural habitats, and population decline of key species.

23. Section 403 of the Clean Water Act (CWA) requires dischargers to comply with specific Ocean Discharge Criteria established to address impacts on marine resources, including fisheries and endangered species. The City of Los Angeles submitted a report on May 29, 2003, to demonstrate compliance with the Section 403 Ocean Discharge Criteria. Based upon an evaluation of previous receiving water monitoring data and reports from other agencies, the City concluded that no unreasonable degradation of the marine environment is occuring with the current discharge receiving full secondary treatment.

24. **Atmospheric Deposition on Santa Monica Bay –** The Santa Monica Bay air deposition study was conducted with the overall support of the Santa Monica Bay Restoration Project (SMBRP) and the Los Angeles County Department of Public Works. Due to limited resources, the primary emphasis was deposition of trace metals.

Data collection and analysis were undertaken collaboratively by scientists from University of California at Los Angeles (UCLA) and the Southern California Coastal Water Research Project (SCCWRP). This study ran concurrently with a study of air toxics conducted by AQMD. During the study, scientists used air concentration data gathered from a site located on the UCLA campus, as well as data collected by AQMD from 24 locations throughout the airshed. This information was then entered into a computer model which calculated and plotted the distribution of deposition rates at different locations under varying weather conditions. Researchers also collected sea surface microlayer (the very thin upper surface layer) information from eight locations in the Bay and analyzed these samples for contaminant concentrations to study the spatial pattern of deposition. The observed distribution pattern for the sea surface samples indicates that farther away from the shore there is less zinc fallout and agrees well the modeling results.

The major conclusions of the final report (September 2001) are:

1) Aerial deposition is a significant contributor to the overall pollutant loading to Santa Monica Bay for trace metals, such as lead, chromium, and zinc.
2) On an annual basis, daily dry atmospheric deposition of metals on Santa Monica Bay and its watershed far exceeds the amount deposited during rain events. Chronic daily dry atmospheric deposition is also far greater than deposition during Santa Ana conditions when large volumes of polluted air are blown from inland areas to the ocean.
3) Most of the mass of metals deposited by dry atmospheric deposition on Santa Monica Bay and its watershed originates as relatively large (larger than 10 microns) aerosols

from area sources (e.g., off-road vehicles and small business) in the Santa Monica Bay watershed.

APPLICABLE LAWS, PLANS, POLICIES AND REGULATIONS

25. ***Federal Clean Water Act -*** Section 301(a) of the CWA requires that point source discharges of pollutants to a water of the United States must be in conformance with a National Pollutant Discharge Elimination System (NPDES) permit. NPDES permits establish effluent limitations that incorporate various CWA requirements designed to protect and enhance water quality. The CWA section 402 authorizes USEPA or States with an approved NPDES program to issue NPDES permits. The State of California has an approved NPDES program.

26. ***Basin Plan -*** The Board adopted and USEPA has approved under CWA section 303(c) a revised and amended *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) subsequently amended by Resolution Nos. 97-02, 01-018, 2002-011, 2002-022, 2003-001, and 2003-10, also approved by USEPA under section 303(c). This updated and consolidated plan represents the Board's master water quality control planning document and regulations. The Basin Plan: (i) designates beneficial uses for surface and groundwaters, (ii) sets narrative and numeric objectives that must be attained or maintained to protect the designated (existing and potential) beneficial uses and conform to State and federal antidegradation policies, and (iii) includes implementation provisions, programs, and policies to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) applicable State and Regional Board plans and policies and other State-pertinent water quality policies and regulations. This Order and permit implement the plans, policies and provisions of the Basin Plan.

27. ***Ocean Plan -*** On November 16, 2000, the State Water Resources Control Board (State Board) adopted a revised *Water Quality Control Plan for the Ocean Waters of California* (Ocean Plan*)*. The revised plan was approved by USEPA, on December 3, 2001, for the CWA purposes. This Order and permit include effluent and receiving water limitations, prohibitions, and provisions that implement the Ocean Plan.

28. ***Beneficial Uses -*** The receiving water, Dockweiler Beaches (Hydrologic Unit No. 405.12), is part of El Segundo/LAX Sub-Watershed of the Santa Monica Bay Watershed. The Basin Plan contains water quality objectives for and lists the following beneficial uses of waterbodies in the El Segundo/LAX Sub-Watershed area:

    <u>Dockweiler Beaches (Hydrologic Unit 405.12)</u>

    Existing: industrial service supply, navigation, water contact recreation, non-contact water recreation, commercial and sport fishing, marine habitat, and wildlife habitat.

    Potential: spawning, reproduction, and/or early development.

    <u>Nearshore Zone</u> (defined as the zone bounded by the shoreline and a line 1000 feet from the shoreline or the 30-foot depth contours, whichever is further from the shoreline)

Existing: industrial service supply, navigation, water contact recreation, non-contact water recreation, commercial and sport fishing, marine habitat, wildlife habitat, preservation of biological habitats, rare, threatened, or endangered species, migration of aquatic organisms, and spawning, reproduction, and/or early development.

Offshore Zone

Existing: industrial service supply, navigation, water contact recreation, non-contact water recreation, commercial and sport fishing, marine habitat, wildlife habitat, migration of aquatic organisms, and spawning, reproduction, and/or early development.

Chapter 1, section A, of the Ocean Plan contains the beneficial uses of the ocean waters of the State that shall be protected. These beneficial uses include: industrial water supply; water contact and non-contact recreation, including aesthetic enjoyment; navigation; commercial and sport fishing; mariculture; preservation and enhancement of designated Area of Special Biological Significance (ASBS); rare and endangered species; marine habitat; fish migration; fish spawning and shellfish harvesting.

29. ***Antidegradation Policy –*** On October 28, 1968, the State Board adopted Resolution No. 68-16*, Maintaining High Quality Water*, which established an antidegradation policy for State and Regional Boards. Similarly, CWA (section 304(d)(4)(B)) and USEPA regulations (40 CFR 131.12) require that all permitting actions be consistent with the federal antidegradation policy. Together, the State and federal policies are designed to ensure that a water body will not be degraded by a permitted discharge, except under the conditions established in the State Antidegradation Policy and the federal regulation. The provisions of this Order and permit are consistent with these antidegradation policies.

30. ***Watershed Management –*** This Regional Board has been implementing a Watershed Management Approach (WMA) to address water quality protection in Los Angeles and Ventura Counties. The approach is in accordance with USEPA guidance on *Watershed Protection: A Project Focus* (EPA841-R-95-003, August 1995). The objective is to provide a comprehensive and integrated strategy resulting in water resource protection, enhancement and restoration, while balancing economic and environmental impacts within a hydrologically defined drainage basin or watershed. The Management Approach emphasizes cooperative relationships between regulatory agencies, the regulated community, environmental groups, and other stakeholders in the watershed to achieve the greatest environmental improvements with the resources available. This Order and the accompanying *Monitoring and Reporting Program* fosters implementation of this approach. The *Monitoring and Reporting Program* requires the Discharger to participate in regional water quality and kelp bed monitoring programs in the Southern California Bight.

31. ***CWA 303(d) Listed Pollutants –*** On July 25, 2003, USEPA approved the State's 2002 list of impaired waterbodies prepared pursuant to CWA 303(d). The list (hereinafter referred to as the 303(d) list) identifies waterbodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations by point sources (water quality-limited waterbodies).

Santa Monica Bay (Offshore and Nearshore) is on the 303(d) list for the following pollutants/stressors, from point and non-point sources: chlordane (sediment), DDT (tissue & sediment), polycyclic aromatic hydrocarbons (sediment), PCBs (tissue & sediment), debris, sediment toxicity, and fish consumption advisory. This Order and permit prescribe Water Quality Based Effluent Limits (WQBELs) for chlordane, DDT, PAHs, and PCBs, as described in Finding 54.

32. ***Santa Monica Bay Beaches Bacteria Total Maximum Daily Loads (TMDLs)*** – The Board has adopted two TMDLs to reduce bacteria at Santa Monica Bay beaches during dry and wet weather. The Board adopted the Dry Weather and Wet Weather TMDLs on January 24, 2002 and December 12, 2002, respectively (Resolution Nos. 2002-004 and 2002-022). These TMDLs were approved by the State Board, State OAL and USEPA Region IX and became effective on July 15, 2003. In these TMDLs, waste load allocations (WLAs) are expressed as the number of sample days at a shoreline monitoring site that may exceed the single sample targets for total coliform, fecal coliform and enterococcus identified under "Numeric Target" in the TMDLs. Waste load allocations are expressed as allowable exceedance days because the bacterial density and frequency of single sample exceedances are the most relevant to public health protection at beaches. The final shoreline compliance point for the WLAs in the TMDLs is the wave wash where there is a freshwater outlet (i.e., publicly owned storm drain or natural creek) to the beach, or at ankle depth at beaches without a freshwater outlet. The City of Los Angeles, as the owner of Hyperion Treatment Plant, is identified as a responsible jurisdiction in these TMDLs. In these TMDLs, Hyperion Treatment Plant is assigned a WLA of zero days of exceedance of the single sample bacterial objectives during all three identified periods – summer dry weather, winter dry weather and wet weather. Hyperion's WLA of zero exceedance days requires that no discharge from Hyperion's outfall may cause or contribute to any exceedances of the single sample bacteria objectives at the shoreline compliance points identified in the TMDL and, subsequently, in the approved Coordinated Shoreline Monitoring Plan (dated April 7, 2004) submitted by responsible agencies and jurisdictions under the TMDLs. Because it has been demonstrated that the plume from the outfall does not come into contact with the shoreline and has never been detected less than 2.5 km from shore (see Finding 20), this Order and permit do not require shoreline monitoring. However, the shoreline monitoring data collected in LA County Stormwater Monitoring (MS4) Permit will be used to demonstrate compliance with the WLAs in these TMDLs.

BASIS FOR EFFLUENT AND RECEIVING WATER LIMITS AND OTHER DISCHARGE REQUIREMENTS

33. ***Water Quality Objectives and Effluent Limits -*** Water Quality Objectives (WQOs) and effluent limitations in this permit are based on:

- The plans, policies and water quality standards (beneficial uses + objectives + antidegradation policy) contained in the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*, as amended and approved by USEPA through the public notice date of this Order and permit (Basin Plan);
- *Water Quality Control Plan, Ocean Waters of California, California Ocean Plan,* State Water Resources Control Board, 2001 (Ocean Plan);

- *Region 9 & 10 Guidance for Implementing Whole Effluent Toxicity Programs, Final* , USEPA Regions IX & X, May 31, 1996;
- *Whole Effluent Toxicity (WET) Control Policy*, USEPA, July 1994;
- Applicable federal laws and regulations
  - Federal Clean Water Act, and
  - 40 CFR 122, 125, and 131, among others; and,
- Best professional judgment (pursuant to 40 CFR 122.44).

34. USEPA regulations, policy, and guidance documents upon which Best Professional Judgment (BPJ) was developed include, in part:

    - *Technical Support Document for Water Quality Based Toxics Control,* March 1991 (EPA-505/2-90-001);
    - *U.S. EPA NPDES Permit Writers' Manual,* December 1996 (EPA-833-B-96-003);
    - *Inspectors Guide for Evaluation of Municipal Wastewater Treatment Plants*, April 1979 (EPA/430/9-79-010); and,
    - *Fate of Priority Pollutants in Publicly Owned Treatment Works Pilot Study,* October 1979 (EPA-440/1-79-300).

35. Where numeric water quality objectives have not been established in the Basin Plan or Ocean Plan, 40 CFR 122.44(d) specifies that water quality based effluent limits may be set based on USEPA criteria and supplemented where necessary by other relevant information to attain and maintain narrative water quality criteria to fully protect designated beneficial uses.

36. ***Mass and Concentration Limits –*** 40 CFR 122.45(f)(1) requires that except under certain conditions, all permit limits, standards, or prohibitions be expressed in terms of mass units. 40 CFR 122.45(f)(2) allows the permit writer, at their discretion, to express limits in additional units (e.g., concentration units). The regulations mandate that, where limits are expressed in more than one unit, the permittee must comply with both.

    Generally, mass-based limits ensure that proper treatment, and not dilution, is employed to comply with the final effluent concentration limits. Concentration-based effluent limits, on the other hand, discourage the reduction in treatment efficiency during low-flow periods and require proper operation of the treatment units at all times. In the absence of concentration-based effluent limits, a permittee would be able to increase its effluent concentration (i.e., reduce its level of treatment) during low-flow periods and still meet its mass-based limits. To account for this, this permit includes mass and concentration limits for some constituents, except during wet weather storm events that cause flows to the treatment plant to exceed the plant's design capacity. Therefore, during storm events when flows exceed design capacity, only concentration-based limits are applicable.

37. ***Maximum Daily Effluent Limitations –*** Pursuant to 40 CFR 122.45(d)(2), for POTW continuous discharges, all permit effluent limitations, standards, and prohibitions, including those necessary to achieve water quality standards, shall, unless impracticable, be stated as average weekly and average monthly discharge limitations. It is impracticable to include only average weekly and average monthly effluent limitations in the permit, because a single daily discharge of certain pollutants, in excess amounts, can cause violations of water quality objectives. The effects of pollutants on aquatic organisms are

often rapid. For many pollutants, an average weekly or average monthly effluent limitation alone is not sufficiently protective of beneficial uses. As a result, maximum daily effluent limitations, as referenced in 40 CFR 122.45(d)(1), are included in the permit for certain constituents.

38. ***Pretreatment –*** In compliance with 40 CFR 403, the City developed a Pretreatment Program for POTWs owned and operated by the City. The City's Pretreatment Program was approved by USEPA on June 30, 1983. In 1989, USEPA delegated the authority to administer pretreatment programs in California to the State and Regional Boards. Thus, this Regional Board became the approval authority for pretreatment programs in Los Angeles and Ventura Counties.

    This Order and permit include the City's approved Pretreatment Program and require the City to continue implementation and control of the Program throughout the Hyperion Treatment Plant's service area, including contributing jurisdictions. The POTW, as Control Authority, may exercise its authority over the entire service area directly, as provided by state law, or may elect to enter into contracts or other multi-jurisdictional agreements with the contributing jurisdictions. In case the POTW elects to enter into inter-jurisdictional agreements, the POTW must ensure that discharges received from entities outside of its political boundaries are regulated to the same extent, as are the discharges from within its political boundaries.

    The City applies one set of local limits to all discharges from the Hyperion Treatment Plant, Tillman WRP, and LAGWRP to the Hyperion Treatment System. Burbank WRP is also part of the Hyperion Treatment System. To meet the effluent limitations of this Order and permit and General Pretreatment Regulations, this Order and permit require the City to reevaluate local limits for discharges to the Hyperion Treatment System.

39. ***Sludge Disposal –*** To implement CWA Section 405(d), on February 19, 1993, USEPA promulgated 40 CFR 503 to regulate the use and disposal of municipal sewage sludge. This regulation was amended on September 3, 1999. The regulation requires that producers of sewage sludge meet certain reporting, handling, and disposal requirements. It is the responsibility of the City to comply with said regulations that are enforceable by USEPA, because California has not been delegated the authority to implement this program. The City is also responsible for compliance with WDRs and NPDES permits for the generation, transport and application of biosolids issued by the State Board, other regional boards, or USEPA, to whose jurisdiction the Hyperion biosolids will be transported and applied.

40. ***Storm Water Management –*** CWA section 402(p), as amended by the Water Quality Act of 1987, requires NPDES permits for storm water discharges. Pursuant to this requirement, in 1990, USEPA promulgated 40 CFR 122.26 that established requirements for storm water discharges under an NPDES permit. To facilitate compliance with federal regulations, on November 1991, the State Board issued a statewide general permit, *General NPDES Permit No. CAS000001 and Waste Discharge Requirements for Discharges of Storm Water Associated with Industrial Activities.* This permit was amended in September 1992 and reissued on April 17, 1997 as State Board Order No. 97-03-DWQ. The Hyperion Treatment Plant is covered under this general permit.

41. ***Clean Water Act Effluent Limitations –*** Numeric and narrative effluent limitations are established pursuant to Section 301 (Effluent Limitations), Section 302 (Water Quality-Related Effluent Limitations), Section 303 (Water Quality Standards and Implementation Plans), Section 304 (Information and Guidelines [Effluent]), Section 305 (Water Quality Inventory), Section 307 (Toxic and Pretreatment Effluent Standards), and Section 402 (NPDES) of the CWA. The CWA and amendments thereto are applicable to the discharges regulated by this Order and permit.

42. ***Antibacksliding Policies –*** Antibacksliding provisions are contained in Sections 303(d)(4) and 402(o) of the CWA and in 40 CFR 122.44(l). These provisions require a reissued permit to be as stringent as the previous permit with some exceptions. Section 402(o)(2) outlines six exceptions where effluent limitations may be relaxed.

    The relaxation of effluent limitations for certain discharges covered by this Order and permit are excepted from antibacksliding pursuant to CWA sections 402(o)(2)(B)(I) and 303(d)(4) because new information is available about the likelihood of constituents to be present in concentrations with the reasonable potential to cause or contribute to excursions above water quality standards. This new information would have justified the application of less stringent effluent limitations at the time the NPDES permit was previously issued. Pursuant to the reasonable potential analysis, certain constituents that previously had water quality-based effluent limitations have been shown not to have reasonable potential and, as a result, no longer require effluent limitations to protect water quality standards. Consistent with antibacksliding statutes and regulations and antidegradation policies, the effluent limitations contained in this Order and permit are at least as stringent as existing effluent limitation and are fully protective of existing, intermittent, and potential designated beneficial uses. Reasonable Potential Analysis results are described in Finding 53.

43. ***Types of Pollutants –*** For CWA regulatory purposes, pollutants are grouped into three general categories under the NPDES program: conventional, toxic, and non-conventional. By definition, there are five conventional pollutants (listed in 40 CFR 401.16) – 5-day biochemical oxygen demand, total suspended solids, fecal coliform, pH, and oil and grease. Toxic or "priority" pollutants are those defined in Section 307(a)(1) of the CWA (and listed in 40 CFR 401.12 and 40 CFR 423, Appendix A) and include heavy metals and organic compounds. Non-conventional pollutants are those which do not fall under either of the two previously described categories and include such parameters as ammonia, phosphorous, chemical oxygen demand, whole effluent toxicity, etc.

44. ***Technology-Based Limits for Municipal Facilities (POTWs) –*** Technology-based effluent limits require a minimum level of treatment for industrial/municipal point sources based on currently available treatment technologies while allowing dischargers to use any available control techniques to meet the effluent limits. The 1972 CWA required POTWs to meet performance requirements based on available wastewater treatment technology. Section 301 of the CWA established a required performance level—referred to as "secondary treatment"—that all POTWs were required to meet by July 1, 1977. More specifically, section 301(b)(1)(B) of the CWA required that USEPA develop secondary treatment standards for POTWs as defined in section 304(d)(1). Based on this statutory requirement, USEPA developed national secondary treatment regulations which are specified in 40 CFR 133. These technology-based regulations apply to all POTWs and

identify the minimum level of effluent quality to be attained by secondary treatment in terms of five-day biochemical oxygen demand, total suspended solids, and pH.

45. ***Water Quality Based Effluent Limits (WQBELs) –*** WQBELs are designed to protect the quality of the receiving water by ensuring that water quality standards are met by discharges from an industrial/municipal point source. If, after technology-based effluent limits are applied, a point source discharge will cause, have the reasonable potential to cause, or contribute to an exceedance of an applicable water quality standard, then 40 CFR 122.44(d)(1) requires that the permit contain a WQBEL. Although the CWA establishes explicit technology-based requirements for POTWs, Congress did not exempt POTWs from additional regulation to protect water quality standards. As a result, POTWs are also subject to WQBELs. Applicable water quality standards for ocean waters of Santa Monica Bay are contained in the Ocean Plan and Basin Plan. Any pollutant for which reasonable potential exists, pursuant to 40 CFR 122.44(d)(1), to exceed an Ocean Plan or Basin Plan water quality standard has WQBELs. Under 40 CFR 122.44(d)(1)(vii)(B), WQBELs shall ensure that effluent limits are consistent with the assumptions and requirements of any available waste load allocation for the discharge prepared by the State and approved by USEPA pursuant to 40 CFR 130.7. The Santa Monica Bay Beaches TMDLs for bacteria include waste load allocations for the Hyperion Treatment Plant, as described in Finding 32.

46. ***Ocean Plan Limits and Objectives –*** Numerical effluent limitations for conventional, nonconventional, and toxic pollutants were calculated based on effluent limitations in *Table A*, and water quality objectives in *Table B* of the Ocean Plan. The minimum dilution ratio used to calculate effluent limitations for nonconventional and toxic pollutants based on water quality objectives in *Table B* of the Ocean Plan is 84:1 (i.e., 84 parts seawater to one part effluent) and 13:1 for Discharge Serial No. 002 and Discharge Serial No. 001, respectively. The ratios were calculated by the State Board.

47. ***401 Certification -*** The Regional Board has determined that its joint issuance of this NPDES permit with USEPA serves as its certification under CWA section 401 that any discharge pursuant to this permit will comply with the CWA provisions at 33 U.S.C. 1311, 1312, 1313, 1316, and 1317.

48. ***Magnuson-Stevens Fishery Conservation and Management Act (MSA) and Endangered Species Act (ESA) -*** USEPA's reissuance of NPDES permit No. CA0109991 to the City of Los Angeles for Hyperion Treatment Plant is subject to requirements of MSA and section 7 of ESA. On February 9, 2004, USEPA requested updated information related to: (1) essential fish habitat and managed and associated species, and (2) threatened and endangered species and their designated critical habitats, in the vicinity of the Hyperion outfalls from the National Marine Fisheries Service and the U.S. Fish and Wildlife Service (collectively, the Services). Based on this and other relevant information, USEPA is currently evaluating whether there are effects on essential fish habitat and managed and associated species protected under the MSA, or on threatened and endangered species and their designated critical habitats protected under the ESA. Based on the outcome of this analysis, USEPA may engage in consultation with the Services during, and subsequent to, this permit reissuance. USEPA may decide that changes to this permit are warranted based on the results of the completed consultation, and a reopener provision to this effect has been included in the permit.

49. ***Santa Monica Bay Restoration Plan -*** The Hyperion Treatment Plant discharges to Santa Monica Bay, which is one of the most heavily used recreational areas in California. Recognizing the importance of the Bay as a national resource, the State of California and USEPA nominated, and Congress included, Santa Monica Bay in the National Estuary Program. This led to the formation of the Santa Monica Bay Restoration Project that developed the Bay Restoration Plan (BRP) which serves as a blueprint for restoring and enhancing the Bay. The Regional Board plays a lead role in the implementation of the plan. Three of the proposed priorities of the plan are reduction of pollutants of concern at the source (including municipal wastewater treatment plants), attainment of full secondary treatment at the City of Los Angeles' Hyperion Treatment Plant and the County Sanitation Districts of Los Angeles County's Joint Water Pollution Control Plant, and implementation of the mass emission approach for discharges of pollutants to the Bay.

    The Hyperion Treatment Plant has operated with full secondary treatment since December 1998. The Mass Emission Approach's objective is to reduce mass emissions of pollutants that have detectable inputs to the Bay and can accumulate in the marine environment. It complements the existing concentration-based regulatory system while sediment quality objectives are being formulated. The BRP identified copper, lead, silver, and zinc to have interim mass emission performance caps. Similar to the concentration-based performance goals, the mass emission performance caps are not enforceable limitations. The interim mass emission caps for the four metals contained in this Order and permit are based on the average mass emission in 1995 when the mass emission approach was initiated.

REASONABLE POTENTIAL ANALYSIS (RPA)

50. 40 CFR 122.44(d)(1)(i and iii) provide that effluent limitations shall be prescribed in permits for all pollutants or pollutant parameters determined to (or that may) be discharged at a level that will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard. 40 CFR 122.44(d)(1)(ii) provides the factors, including variability of the pollutants in the effluent, to be considered in determining reasonable potential. The procedure for statistical determination of the reasonable potential for a discharged pollutant to exceed an objective is outlined in USEPA guidance, *Technical Support Document for Water Quality-based Toxics Control* (TSD; EPA/505/2-90-001, March 1991). This approach combines knowledge of effluent variability (in terms of a calculated coefficient of variation, CV) with uncertainty (as a function of the number of effluent data) to statistically estimate a maximum effluent value at a high level of confidence. The estimated maximum effluent value is calculated as the value associated with the upper 99 percent confidence level of the 99th percentile, based on a lognormal distribution of daily effluent values. The projected receiving water value (based on the statistically estimated maximum effluent value and dilution ratio) is then compared to the appropriate objective to determine the potential for exceedance of that objective and the need for an effluent limitation.

51. ***Reasonable Potential Determination –*** Regional Board and USEPA staff conducted RPAs for all toxic pollutants listed in *Table B* of the Ocean Plan. Effluent data provided in the Discharger's monitoring reports from January 1999 to June 2004 were used in the analyses. Dilution ratios of 84:1 and 13:1 for Discharge Serial Nos. 002 and 001, respectively, were considered in this evaluation.

52. For any pollutant that has at least one detected value, the maximum detected effluent concentration (MDEC) is identified and compared with the reported maximum MDL (method detection limit) during the reporting period. The larger of these two values (i.e., the MDEC or the reported maximum MDL) is selected as the maximum reported effluent concentration for that pollutant. If the pollutant is not detected in any of the effluent samples, the reported maximum MDL is selected as the maximum reported effluent concentration for that pollutant.

    Effluent data (one half of MDL used for nondetected data) are used to calculate a pollutant-specific CV that is then used to generate a pollutant-specific reasonable potential multiplier. When more than 80 percent of the effluent data are reported as not detected, a default CV of 0.6 is used. The statistically estimated maximum effluent concentration is determined by multiplying the maximum reported effluent concentration with its multiplier. The projected receiving water concentration for each pollutant is then calculated by factoring in the dilution ratio. Finally, the projected receiving water concentration is compared with the appropriate objective listed in the Ocean Plan. Tables R1-1, R1-2, R2-1, and R2-2 in the accompanying Fact Sheet contain effluent data and detailed steps in the determination of reasonable potential.

53. Using this statistical procedure, Regional Board and USEPA staff have determined that the following pollutants, when discharged through each outfall, have reasonable potential to exceed Ocean Plan objectives, and, therefore, require effluent limitations.

    Discharge Serial No. 001

    Copper, cyanide, chlorine residual, ammonia, chronic toxicity, chlorinated phenolic compounds, hexachlorocyclohexane (HCH), 2,4-dinitrophenol, tributyltin, acrylonitrile, aldrin, benzidine, beryllium, bis (2-chloroethyl) ether, bis (2-ethylhexyl) phthalate, chlordane, DDT, 3,3'-dichlorobenzidine, dieldrin, heptachlor, heptachlor epoxide, hexachlorobenzene, n-nitrosodi-n-propylamine, PAHs, PCBs, TCDD equivalents, tetrachloroethene, toxaphene, and 2,4,6-trichlorophenol.

    Discharge Serial No. 002

    Chlorine residual, chronic toxicity, tributyltin, aldrin, benzidine, chlordane, DDT, 3,3'-dichlorobenzidine, dieldrin, heptachlor, heptachlor epoxide, hexachlorobenzene, PAHs, PCBs, TCDD equivalents, and toxaphene.

    During the comment period, the City provided additional information on sediment and fish tissue for nine constituents that were 100% non-detected in the 1999-2004 effluent data set. USEPA and Regional Board staff have evaluated the additional information and determined that eight constituents (aldrin, benzidine, 3,3'-dichlorobenzidine, dieldrin, heptachlor, heptachlor epoxide, hexachlorobenzene, and toxaphene) have no reasonable potential to exceed Ocean Plan objectives. Therefore, effluent limits for these eight constituents are not required. The Fact Sheet contains a detailed analysis for this.

    In addition, based on further analyses of the information and monitoring data, USEPA and Regional Board staff have determined, using BPJ, that there is no RP for chlorine residual when the effluent is discharged through Outfall 002. However, the effluent limit for chlorine residual is retained for Outfall 001 since the effluent is required to be chlorinated

when it is discharged through Outfall 001. The Fact Sheet also contains a detailed analysis for this.

WQBELs for these pollutants discharged through each outfall were calculated using the procedure outlined in the Ocean Plan.

54. At various locations in Santa Monica Bay, DDT and chlordane, PCBs and PAHs are found in sediments at levels that can be harmful to marine organisms. In addition, DDT and PCBs are found in certain Bay-captured seafood species at levels posing potential health risks to humans. A brief description of these pollutants and their occurrence in Santa Monica Bay is given below.

In the U.S., DDT and chlordane, both organochlorine insecticides, were widely used in agricultural and urban settings until they were banned in 1973 and 1988, respectively. PCBs, a large group of industrial and commercial chemicals, were widely used as coolants and lubricants in transformers, capacitors and other electronic equipment until the late 1970s when their manufacture was banned. Because of their stable properties, DDT, chlordane and PCBs persist in the environment, the result of historical uses which no longer occur. They have low water solubility and are generally found in sediments and fish tissue. PAHs are trace organic contaminants that occur naturally in crude oil, coal and other hydrocarbons. Anthropogenic sources include the combustion of hydrocarbons and their presence in fossil fuel products, such as coal-tar pitch and asphalt. PAHs are slightly soluble in water. Binding to particulate matter, they tend to accumulate in sediments and concentrate in biota. When present in sufficient quantity, PAHs are toxic to aquatic life and carcinogenic to humans.

Bight '98 surveys included efforts to assess the spatial extent of anthropogenic contaminant accumulation in benthic sediments and their effects on marine biota in the Southern California Bight. These surveys showed that while elevated levels of DDT, chlordane and PCBs continue to be measured in sediments near Hyperion Treatment Plant's 5-mile outfall, much of this is reflective of historical deposition and not the levels of contaminants associated with recent discharges. These surveys also concluded that DDT and PCBs in sediments are a dominant source of contaminant exposure levels in bottom living fish. DDT continues to be found in fish tissue at levels of concern throughout the Bight, although these levels are declining over time. Elevated levels of PAHs continue to be measured in offshore sediments near Hyperion's 7-mile outfall (Discharge Serial No. 003), decommissioned in November 1987, and are primarily reflective of historical deposition associated with the discharge of sewage sludge. PAHs are also found in shallow water offshore sediments associated with urban storm water runoff from Ballona Creek. (Bay et al., 2003.) Monitoring data show that effluent levels of DDT, chlordane, PCBs and PAHs discharged from the 5-mile outfall (Discharge Serial No. 002) remain at non-detect concentrations.

As described in Finding 31, nearshore and offshore waters of Santa Monica Bay are on the California's 2002 CWA 303(d) list of water quality limited segments for DDT (sediment and tissue, centered on Palos Verdes Shelf); chlordane (sediment); PCBs (sediment and tissue); and PAHs (sediment). TMDLs for DDT, PCBs and PAHs have not been scheduled. A TMDL for chlordane is scheduled for 2006. As TMDLs for these four constituents have not been completed, the draft permit proposes to continue forward mass emission and concentration WQBELs contained in the 1994 permit. These limits are

based on Ocean Plan water quality objectives and permit limit calculation procedures, and, for Discharge Serial No. 002, the average design flow rate (420 mgd) of the Hyperion Treatment Plant in 1994. Current performance for DDT, chlordane, PCBs and PAHs in the Hyperion Treatment Plant effluent are generally at non-detect concentrations.

The Regional Board and USEPA note that non-detect levels reported for the Hyperion effluent are generally higher than permit limits and water quality objectives for DDT, chlordane, PCBs and PAHs. Therefore, in addition to Ocean Plan requirements specified in Monitoring and Reporting Program Sections III and IV of this permit, the Discharger shall strive for lower analytical detection levels to facilitate pollutant load quantification for future DDT, chlordane, PCBs and PAHs TMDLs.

55. In general, for constituents that have been determined to have no reasonable potential to cause, or contribute to, excursions of water quality objectives, no numerical limits are prescribed; instead a narrative statement to comply with all Ocean Plan requirements is provided and the Discharger is required to monitor for these constituents to gather data for use in RPAs for future permit renewals and/or updates.

56. The 1994 order and permit include technology based effluent limits for acute toxicity and freshwater acute toxicity testing requirements specified in the 1990 Ocean Plan. In 2001, the Ocean Plan was revised to include a new daily maximum acute toxicity water quality objective of 0.3 TUa, implementation procedures for developing water quality based effluent limits for acute toxicity, and acute toxicity testing protocols using marine species, rather than freshwater species. While the 2001 Ocean Plan specifies that discharges with dilution ratios below 100:1 must conduct chronic toxicity testing, it does not preclude permitting authorities implementing 40 CFR 122.44(d)(1) from establishing acute toxicity testing requirements, including effluent limits, to ensure protection of the new acute toxicity objective. Because ammonia and marine acute toxicity effluent quality data for POTW ocean discharges having dilution ratios greater than 84:1 periodically show acute toxicity related to effluent ammonia concentrations and the current operation of the Hyperion Treatment Plant does not effectively remove ammonia, the Regional Board and USEPA have determined that the Hyperion discharge has reasonable potential to exceed the current Ocean Plan objective for acute toxicity. Consequently, the Order and permit propose daily maximum acute toxicity effluent limits of 2.8 TUa and “Pass” (for Discharge Serial Nos. 002 and 001, respectively) and testing protocols consistent with the 2001 Ocean Plan.

57. This Order and permit are consistent with State and federal antidegradation policies in that it does not authorize a change in pollutant mass emission rates, nor does it authorize a relaxation in the manner of treatment of the discharge. Pollutant limit mass emission rates continue to be based on the design flow rate of the treatment plant under the 1994 permit of 420 mgd. Although the design flow rate of the treatment plant has increased to 450 mgd, this increase has been accompanied by a significant improvement in the level of effluent treatment necessary to achieve full secondary treatment. As a result, both the quantity of discharged pollutants and quality of the discharge are expected to remain relatively constant or improve during this permit term, consistent with antidegradation policies. In conformance with reasonable potential analysis procedures identified in State Board and USEPA documents, effluent limitations for some constituents are not carried forth in this Order and permit because there is not presently reasonable potential for the constituents to cause or contribute to an exceedance of water quality standards. Without

reasonable potential, there is no longer a need to maintain prior WQBELs under WQBEL regulations, antibacksliding provisions, or antidegradation policies. The accompanying monitoring and reporting program requires continued data collection and if monitoring data show reasonable potential for a constituent to cause or contribute to an exceedance of water quality standards, the permit will be reopened to incorporate appropriate WQBELs. Such an approach ensures that the discharge will adequately protect water quality standards for designated beneficial uses and conforms with antidegradation policies and antibacksliding provisions.

58. The effluent limitations and other requirements in this Order and permit are based upon the Basin Plan, Ocean Plan, other federal and State plans, policies, and guidelines, plant performance, and best engineering judgment; and, as they are met, will be in conformance with the goals of the aforementioned water control requirements. The specific methodology and example calculations for effluent limitations are documented in the Fact Sheet that accompanies this Order and permit.

PERFORMANCE GOALS

59. Chapter III, section F.2, of the Ocean Plan allows the Regional Board and USEPA to establish more restrictive water quality objectives and effluent limitations than those set forth in the Ocean Plan as necessary for the protection of the beneficial uses of ocean waters.

    Pursuant to this provision and to implement the recommendation of the Water Quality Advisory Task Force (*Working Together for an Affordable Clean Water Environment, A final report presented to the California Water Quality Control Board, Los Angeles Region by Water Quality Advisory Task force, September 30, 1993)* that was adopted by the Regional Board on November 1, 1993, performance goals that are more stringent than those based on Ocean Plan objectives are prescribed in this Order and permit. This approach is consistent with the antidegradation policy in that it requires the City to maintain its treatment level and effluent quality, recognizing normal variations in treatment efficiency and sampling and analytical techniques. However, this approach does not address substantial changes in treatment plant operations that could significantly affect the quality of the treated effluent.

60. While performance goals were previously placed in many POTW permits in the Region, they have not been continued for discharges that are to inland surface waters. For inland surface waters, the California Toxics Rule (40 CFR 131.38) has resulted in effluent limits as stringent as many performance goals. However, the Ocean Plan allows for significant dilution, and the continued use of performance goals serves to maintain existing treatment levels and effluent quality and supports State and federal antidegradation policies.

61. The performance goals are based upon the actual performance of the Hyperion Treatment Plant and are specified only as an indication of the treatment efficiency of the facility. Performance goals are intended to minimize pollutant loading (primarily for toxics) and, while maintaining the incentive for future voluntary improvement of water quality whenever feasible, without the imposition of more stringent limits based on improved performance. They are not considered as limitations or standards for the regulation of the discharge from the treatment facility. The Executive Officer and USEPA may modify any of the performance goals if the City requests and has demonstrated that the change is warranted. The

methodology for calculating the performance goals is described below. The results are documented in Tables R1-1, R1-2, R2-1, and R2-2 in the accompanying Fact Sheet.

- For constituents that have been routinely detected in the effluent (less than 80 percent nondetectable data), performance goals are statistically set at the 95th percentile of January 1999 through June 2004 performance data using the protocol described in Appendix E of *Technical Support Document for Water Quality-based Toxics Control*, EPA/505/2-90-001, March 1991. Effluent pollutant data are assumed lognormally distributed. One half of the detection limit is assigned to respective nondetect samples for conducting statistical analyses. However, if the maximum detected effluent concentration (from January 1999 to June 2004) is less than the calculated 95th percentile value, the maximum detected effluent concentration is used as the performance goal.

- For constituents where monitoring data has consistently shown nondetectable levels (at least 80 percent nondetectable data), performance goals are set at five times (for carcinogens and marine aquatic life toxicants) or ten times (for noncarcinogens) the maximum method detection limit (MDL) reported from January 2003 to June 2004. (In order to meet Minimum Level reporting requirement outlined in State Implementation Plan the City has completed new studies on method detection limits during this period.) However, if the maximum detected effluent concentration is less than the calculated value based on MDL, the maximum detected effluent concentration is used as the performance goal.

- For constituents with no RP, if the performance goal derived from the above steps exceeds the respective calculated Ocean Plan effluent limit, the calculated WQBEL is then prescribed as the performance goal for that constituent.

62. ***Mass Emission Benchmarks -*** To address the uncertainty due to potential increases in toxic pollutant loadings from the Hyperion Treatment Plant discharge to the marine environment during the five-year permit term, and to establish a framework for evaluating the need for an antidegradation analysis to determine compliance with State and federal antidegradation requirements at the time of permit reissuance, 12-month average mass emission benchmarks have been established for effluent discharged through the 5-mile outfall (Discharge Serial No. 002) (see MRP VI.D.). These mass emission benchmarks are not enforceable water quality based effluent limitations. They may be re-evaluated and revised during the five-year permit term. The mass emission benchmarks (in metric tons per year; MT/yr) for the Hyperion Treatment Plant discharge were determined using January 1999 through June 2004 effluent concentrations and the Discharger's projected end-of-permit flow of 400 MGD. If only one effluent data point was detected or if all effluent data points were nondetect, the pollutant concentration associated with the maximum method detection limit from January 2003 to June 2004 was used to calculate the mass emission benchmark. If two or more effluent data points were detected, the pollutant concentration associated with the 95th percentile (calculated in accordance with Regional Board procedures) was used to calculate the mass emission benchmark. Exceptions to this are mass emission benchmarks for copper, lead, silver and zinc which are based directly on Mass Emission Caps for these pollutants of concern in Santa Monica Bay, established by the Regional Board (see Section I.B.).

PETITION AND CEQA REQUIREMENTS

63. The Regional Board and USEPA have notified the Discharger and interested agencies and persons of their intent to renew waste discharge requirements and the NPDES permit for this discharge and have provided them with an opportunity to submit written views and recommendations.

64. The Regional Board and USEPA held a public comment period, including a public hearing to receive oral comments and have considered all written and oral comments pertaining to the discharge and to the tentative requirements.

65. This Order and permit shall first be adopted by the Regional Board and then issued by USEPA. USEPA's issuance consists of the service of notice of the Regional Administrator's decision. This permit will become effective 33 days following the date it is mailed to the Discharger by EPA, unless a request for review is filed.

66. Pursuant to the California Water Code (CWC) Section 13320, any aggrieved party may seek review of this Order by filing a petition with the State Board. A petition must be sent to the State Water Resources Control Board, P.O. Box 100, Sacramento CA 95812, within 30 days of adoption of this Order.

67. Pursuant to 40 CFR 124, a petition may be filed with the Environmental Appeals Board to review any condition of the permit decision. If a request for review of the permit is filed, only those permit conditions which are uncontested will go into effect pending disposition of the request for review. Requests for review must be filed within 33 days following the date the final permit is mailed and must meet the requirements of 40 CFR 124.19. All requests for review should be addressed to the Environmental Appeals Board (EAB) as follows. Requests sent through the U.S. Postal Service (except by Express Mail) must be addressed to the EAB's mailing address, which is: U.S. Environmental Protection Agency; Clerk of the Board; Environmental Appeals Board (MC 1103B); Ariel Rios Building; 1200 Pennsylvania Avenue, N.W.; Washington, D.C. 20460-0001. All filings delivered by hand or courier, including Federal Express, UPS, and U.S. Postal Express Mail, should be directed to the following address: Environmental Appeals Board; U.S. Environmental Protection Agency; Colorado Building; 1341 G Street, N.W., Suite 600; Washington, D.C. 20460. Those persons filing a request for review must have filed comments on the draft permit, or participated in the public hearing. Otherwise, any such request for review may be filed only to the extent of changes from the draft to the final permit decision.

68. The issuance of waste discharge requirements that serve as an NPDES permit for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 (California Environmental Quality Act) of the Public Resources Code in accordance with California Water Code Section 13389.

IT IS HEREBY ORDERED that the City of Los Angeles, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the federal Clean Water Act and regulations and guidelines adopted thereunder, and the provisions of the Ocean Plan and regulations and guidelines adopted thereunder, shall comply with the following:

I. DISCHARGE REQUIREMENTS

A. Effluent Limitations and Performance Goals
(For footnotes, please see pages 33 to 35)

1. Discharge Outfalls

a. Discharge Serial No. 001 (one-mile outfall)

Wastes discharged from Discharge Serial No. 001 shall be limited to chlorinated secondary treated effluent (domestic and industrial wastewater, diverted dry weather urban runoff, and storm water from Hyperion Treatment Plant). However, during intense storms or storms accompanied with plant power outages, undisinfected storm water overflow is also permitted at this outfall. Discharge from Discharge Serial No. 001 is only permitted for emergency cases such as extremely high flows and power failures, and for quarterly preventative maintenance to conduct outfall gate valve(s) exercising and lubrication.

b. Discharge Serial No. 002 (five-mile outfall)

Wastes discharged from Discharge Serial No. 002 shall be limited to secondary treated effluent (domestic and industrial wastewater, diverted dry weather urban runoff, and storm water from Hyperion Treatment Plant).

c. Discharge Serial No. 003

Any waste discharged from Discharge Serial No. 003 is prohibited.

2. The effluent limitations and performance goals for Discharge Serial No. 002, and the effluent limitations for Discharge Serial No. 001 are given below. The listed effluent performance goals are not enforceable effluent limitations or standards. The discharge of an effluent with constituents in excess of effluent limitations is prohibited.

The Discharger shall maintain, if not improve, its treatment efficiency. Any exceedance of the performance goals shall trigger an investigation into the cause of the exceedance. If the exceedance persists in **three** successive monitoring periods, the City shall submit a written report to the Regional Board and USEPA on the nature of the exceedance, the results of the investigation as to the cause of the exceedance, and the corrective actions taken or proposed corrective measures with timetable for implementation, if necessary.

a. **Discharge Serial Nos. 001 and 002**

(1) Major Wastewater Constituents

Discharge Serial Nos. 001 and 002

Constituent	Units	DISCHARGE LIMITATIONS [1]		
		Monthly Average	Weekly Average	Daily Maximum [2]
$BOD_5 20^0C$ [3]	mg/L	30	45	[4]
	lbs/day	113,000	169,000	---
Suspended solids [3]	mg/L	30	45	[4]
	lbs/day	113,000	169,000	---
Oil and grease [5]	mg/L	25	40	75
	lbs/day	93,800	150,000	---
Settleable solids [5]	ml/L	1.0	1.5	3.0
Turbidity [5]	NTU	75	100	225

b. **Discharge Serial No. 002**

(1) Toxic Materials - Marine Aquatic Life Toxicants

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]			PERFORMANCE GOALS [8]
		Monthly Average	Daily Maximum [2]	Instantaneous Maximum [7]	Monthly Average
Arsenic [29]	µg/L	[9]	[9]	[9]	3.5 [10]
Cadmium [29]	µg/L	[9]	[9]	[9]	0.63 [11]
Chromium (hexavalent) [13] [29]	µg/L	[9]	[9]	[9]	10 [12]
Copper [14] [29]	µg/L	[9]	[9]	[9]	23 [10]
Lead [14] [29]	µg/L	[9]	[9]	[9]	3.8 [10]
Mercury [29]	µg/L	[9]	[9]	[9]	0.3 [11]
Nickel [29]	µg/L	[9]	[9]	[9]	15 [10]

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]			PERFORMANCE GOALS [8]
		Monthly Average	Daily Maximum [2]	Instantaneous Maximum [7]	Monthly Average
Selenium [29]	µg/L	[9]	[9]	[9]	1.7 [10]
Silver [14] [29]	µg/L	[9]	[9]	[9]	2.2 [10]
Zinc [14] [29]	µg/L	[9]	[9]	[9]	39 [10]
Cyanide	µg/L	[9]	[9]	[9]	8.3 [10]
Ammonia as N	mg/L	[9]	[9]	[9]	36.3 [10]
Phenolic compounds (non-chlorinated) [31]	µg/L	[9]	[9]	[9]	1.9 [11]
Phenolic compounds (chlorinated) [32]	µg/L	[9]	[9]	[9]	0.46 [11]
Endosulfan [17]	µg/L	[9]	[9]	[9]	0.02 [12]
HCH [18]	µg/L	[9]	[9]	[9]	0.026 [10]
Endrin	µg/L	[9]	[9]	[9]	0.009 [11]
Acute toxicity [19]	TUa	N/A	2.8	N/A	N/A
Chronic toxicity [20]	TUc	N/A	84 [21]	N/A	N/A
Radioactivity					
Gross alpha	pCi/L	N/A	15 [30]	N/A	N/A
Gross beta	pCi/L	N/A	50 [30]	N/A	N/A
Combined radium-226 & radium-228	pCi/L	N/A	5.0 [30]	N/A	N/A
Tritium	pCi/L	N/A	20,000 [30]	N/A	N/A
Strontium-90	pCi/L	N/A	8.0 [30]	N/A	N/A
Uranium	pCi/L	N/A	20 [30]	N/A	N/A

(2) Human Health Toxicants – Non Carcinogens

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]	PERFORMANCE GOALS [8]
		Monthly Average	Monthly Average
Acrolein	µg/L	[9]	20 [12]
Antimony [29]	µg/L	[9]	5 [10]
Bis(2-chloroethoxy) methane	µg/L	[9]	0.5 [12]
Bis(2-chloroisopropyl) ether	µg/L	[9]	0.5 [12]
Chlorobenzene	µg/L	[9]	1.2 [12]
Chromium (III) [29]	µg/L	[9]	6.6 [10]
Di-n-butyl-phthalate	µg/L	[9]	0.77 [11]
Dichlorobenzenes [22]	µg/L	[9]	0.17 [11]
Diethyl phthalate	µg/L	[9]	0.1 [11]
Dimethyl phthalate	µg/L	[9]	2.7 [12]
2-Methyl-4,6-dinitrophenol	µg/L	[9]	4 [12]
2,4-Dinitrophenol	µg/L	[9]	2.1 [12]
Ethyl benzene	µg/L	[9]	0.17 [11]
Fluoranthene	µg/L	[9]	0.18 [11]
Hexachlorocyclopentadiene	µg/L	[9]	29 [12]
Nitrobenzene	µg/L	[9]	0.5 [12]
Thallium [29]	µg/L	[9]	5 [11]
Toluene	µg/L	[9]	0.46 [10]
Tributyltin	ng/L	120	7.2 [10]
	lbs/day	0.42	---

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]	PERFORMANCE GOALS [8]
		Monthly Average	Monthly Average
1,1,1-Trichloroethane	µg/L	[9]	1.8 [12]

(3) Human Health Toxicants – Carcinogens

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]	PERFORMANCE GOALS [8]
		Monthly Average	Monthly Average
Acrylonitrile	µg/L	[9]	1.6 [12]
Aldrin	µg/L	[9]	0.0019 [33]
Benzene	µg/L	[9]	0.36 [11]
Benzidine	µg/L	[9]	0.0059 [33]
Beryllium [29]	µg/L	[9]	0.05 [12]
Bis(2-chloroethyl) ether	µg/L	[9]	0.45 [12]
Bis(2-ethylhexyl) phthalate	µg/L	[9]	6.9 [10]
Carbon tetrachloride	µg/L	[9]	0.75 [12]
Chlordane [23]	µg/L	0.0019	[15]
	lbs/day	0.0067	---
Chlorodibromomethane	µg/L	[9]	3.9 [10]
Chloroform	µg/L	[9]	6.6 [10]
DDT [24]	µg/L	0.014	[15]
	lbs/day	0.049	---
1,4-Dichlorobenzene	µg/L	[9]	5.3 [11]
3,3-Dichlorobenzidine	µg/L	[9]	0.55 [12]
1,2-Dichloroethane	µg/L	[9]	0.25 [12]

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]	PERFORMANCE GOALS [8]
		Monthly Average	Monthly Average
1,1-Dichloroethylene	µg/L	[9]	0.65 [12]
Dichlorobromomethane	µg/L	[9]	1.5 [10]
Dichloromethane	µg/L	[9]	22 [10]
1,3-Dichloropropene	µg/L	[9]	0.9 [12]
Dieldrin	µg/L	[9]	0.0034 [33]
2,4-Dinitrotoluene	µg/L	[9]	0.4 [12]
1,2-Diphenylhydrazine	µg/L	[9]	0.18 [11]
Halomethanes [25]	µg/L	[9]	1.3 [10]
Heptachlor	µg/L	[9]	0.0043 [33]
Heptachlor epoxide	µg/L	[9]	0.0017 [33]
Hexachlorobenzene	µg/L	[9]	0.018 [33]
Hexachlorobutadiene	µg/L	[9]	0.35 [12]
Hexachloroethane	µg/L	[9]	0.35 [12]
Isophorone	µg/L	[9]	0.33 [11]
N-Nitrosodimethylamine	µg/L	[9]	0.85 [12]
N-Nitrosodi-N-propylamine	µg/L	[9]	0.65 [12]
N-Nitrosodiphenylamine	µg/L	[9]	0.45 [12]
PAHs [26]	µg/L	0.748	[15]
	lbs/day	2.62	---
PCBs [27]	µg/L	0.002	[15]
	lbs/day	0.007	---

Discharge Serial No. 002

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]	PERFORMANCE GOALS [8]
		Monthly Average	Monthly Average
TCDD equivalents [28]	pg/L	0.33	[15]
	lbs/day	$1.2x10^{-6}$	---
1,1,2,2-Tetrachloroethane	µg/L	[9]	1 [12]
Tetrachloroethylene	µg/L	[9]	5.8 [10]
Toxaphene	µg/L	[9]	0.018 [33]
Trichloroethylene	µg/L	[9]	0.53 [11]
1,1,2-Trichloroethane	µg/L	[9]	0.85 [12]
2,4,6-Trichlorophenol	µg/L	[9]	0.45 [12]
Vinyl chloride	µg/L	[9]	0.85 [12]

c. **Discharge Serial No. 001**

(1) Toxic Materials - Marine Aquatic Life Toxicants

Discharge Serial No. 001

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]		
		Monthly Average	Daily Maximum [2]	Instantaneous Maximum [7]
Copper [14] [29]	µg/L	16	140	160
Cyanide	µg/L	14	56	140
Total chlorine residual [16]	mg/L	0.028	0.092	0.84
Ammonia as N	mg/L	8.4	34	84
Phenolic compounds (chlorinated) [32]	µg/L	14	56	140
HCH [18]	µg/L	0.056	0.11	0.17

Discharge Serial No. 001

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]		
		Monthly Average	Daily Maximum [2]	Instantaneous Maximum [7]
Chronic toxicity [20]	TUc	N/A	13 [21]	N/A
Radioactivity				
Gross alpha	pCi/L	N/A	15 [30]	N/A
Gross beta	pCi/L	N/A	50 [30]	N/A
Combined radium-226 & radium-228	pCi/L	N/A	5.0 [30]	N/A
Tritium	pCi/L	N/A	20,000 [30]	N/A
Strontium-90	pCi/L	N/A	8.0 [30]	N/A
Uranium	pCi/L	N/A	20 [30]	N/A

(2) Human Health Toxicants – Non Carcinogens

Discharge Serial No. 001

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]
		Monthly Average
2,4-Dinitrophenol	µg/L	56
Tributyltin	ng/L	20

(3) Human Health Toxicants – Carcinogens

Discharge Serial No. 001

Constituent	Units	DISCHARGE LIMITATIONS [1, 6]
		Monthly Average
Acrylonitrile	µg/L	1.4
Beryllium [29]	µg/L	0.46
Bis(2-chloroethyl) ether	µg/L	0.63
Bis(2-ethylhexyl) phthalate	µg/L	49
Chlordane [23]	ng/L	0.3

Discharge Serial No. 001

Constituent	Units	DISCHARGE LIMITATIONS [1, 6] Monthly Average
DDT [24]	ng/L	2.4
N-Nitrosodi-N-propylamine	µg/L	5.3
PAHs [26]	ng/L	123
PCBs [27]	ng/L	0.3
TCDD equivalents [28]	pg/L	0.055
Tetrachloroethylene	µg/L	28
2,4,6-Trichlorophenol	µg/L	4.1

Footnotes for Effluent Limitations

[1] The mass emission rates for Discharge Serial No. 002 are based on the average design flow rate (420 mgd) of the Hyperion Treatment Plant in the 1994 permit.

During storm events when flow exceeds the design capacity, the mass emission rate limits shall not apply. Only the concentration limits shall apply.

[2] The daily maximum effluent concentration limit shall apply to flow-weighted 24-hour composite samples. It may apply to grab samples if the collection of composite samples for those constituents is not appropriate because of the instability of the constituents.

[3] Limits are based on secondary treatment standards, 40 CFR 133.102.

[4] Daily maximum limits are not specified for secondary treatment standards in 40 CFR 133.102.

[5] Limits are based on Ocean Plan effluent limitations, Table A.

[6] Effluent limitations for these constituents are based on Ocean Plan objectives using initial dilution ratios of 84 and 13 parts of seawater to 1 part effluent for Discharge Serial Nos. 002 and 001, respectively.

[7] The instantaneous maximum shall apply to grab sample results.

[8] The performance goals are based upon the actual performance data of Hyperion Treatment Plant and are specified only as an indication of the treatment efficiency of the plant. They are not considered as limitations or standards for the treatment plant. Hyperion Treatment Plant shall make best efforts to maintain, if not improve, the effluent quality at the level of these performance goals. The Executive Officer and USEPA may modify any of the performance goals if the City requests and has demonstrated that the change is warranted.

[9] These constituents did not show reasonable potential to exceed the Ocean Plan objectives, therefore, no numerical water quality based effluent limits are prescribed.

[10] Numerical effluent quality performance goals are derived statistically using data in the Discharger Monitoring Reports from January 1999 to June 2004 when Hyperion Treatment Plant was operating in full secondary treatment mode. Please refer to Finding 61 for calculation procedures.

On January 1, 2003, the Hyperion Treatment Plant started full thermophilic digestion for the generation of class A biosolids, which increased the ammonia concentration in the returned centrate (about 3 mgd) from approximately 800 mg/L to 1250 mg/L. Therefore, the performance goal for ammonia nitrogen is derived based on monthly monitoring data reported from January 2003 to June 2004, only.

[11] The maximum detected effluent concentration (MDEC) for the pollutant from January 1999 to June 2004 is prescribed as the performance goal because the value derived from Footnotes [10] or [12] is higher than the respective MDEC. Please refer to Finding 61 for procedures.

[12] These constituents were not detected. Performance goals are set at five times (for carcinogens and marine aquatic life toxicants) or ten times (for noncarcinogens) of the maximum reported method detection limit (between January 2003 and June 2004).

[13] The City has the option to meet the hexavalent chromium performance goal with a total chromium analysis. However, if the total chromium level exceeds the hexavalent chromium performance goal, it will be considered an exceedance unless an analysis has been made for hexavalent chromium in a replicate/split sample and the result has been shown to be in compliance with the hexavalent chromium performance goal.

[14] This constituent is a pollutant of concern. Mass emission goals in the form of Caps are established for maintaining the 1995 emission levels for pollutants of concern (see Section I.B.).

[15] These constituents were determined to have reasonable potential to exceed the respective water quality objective. Therefore, effluent limits are prescribed for these constituents. Since the calculated performance goal is higher than the respective effluent limit, no performance goal is prescribed.

[16] These total chlorine residual limits shall only apply to continuous discharge exceeding two hours.

For intermittent discharges not exceeding two hours, water quality objectives for total chlorine residual shall be determined through the use of the following equation:

$\log y = -0.43(\log x) + 1.8$

where: y = the water quality objective (in µg/L) to apply when chlorine is being discharged;
x = the duration of uninterrupted chlorine discharge in minutes.

For intermittent discharges not exceeding two hours, the applicable total chlorine residual limit (daily maximum) shall then be calculated using the above calculated water quality objective according to procedures outlined in Section III.C.3.a of the 2001 Ocean Plan. The minimum dilution ratios shall be 13:1 for Discharge Serial No. 001, and 84:1 for Discharge Serial No. 002.

[17] Endosulfan shall mean the sum of endosulfan-alpha and -beta and endosulfan sulfate.

[18] HCH means the sum of alpha, beta, gamma (lindane), and delta isomers of hexachlorocyclohexane.

[19] Expressed as Acute Toxicity Units (TUa)

<u>For Discharge Serial Nos. 001 and 002</u>:

$TUa = 100/LC50$

where: Lethal Concentration, 50 Percent (LC50) is expressed as the estimate of the percent effluent concentration that causes death in 50% of the test population, in the time period prescribed by the toxicity test, as required by this permit.

[20] Expressed as Chronic Toxicity Units (TUc)

$TUc = 100/NOEC$

where: NOEC (No Observed Effect Concentration) is expressed as the maximum percent effluent that causes no observable effect on test organisms as determined by the result of a critical life stage toxicity test, as required by this permit.

[21] Effluent limit is the same as that in Order No. 94-021 and is more stringent than the calculated limit based on 2001 Ocean Plan Objectives (Antibacksliding Policy)

[22] Dichlorobenzenes shall mean the sum of 1,2- and 1,3-dichlorobenzene.

[23] Chlordane means the sum of chlordane-alpha, chlordane-gamma, chlordene-alpha, chlordene-gamma, nonachlor-alpha, nonachlor-gamma and oxychlordane.

[24] DDT means the sum of 4,4'-DDT, 2,4'-DDT, 4,4'-DDE, 2,4'-DDE, 4,4'-DDD and 2,4'-DDD.

[25] Halomethanes shall mean the sum of bromoform, bromomethane (methyl bromide) and chloromethane (methyl chloride).

[26] PAHs (polynuclear aromatic hydrocarbons) mean the sum of acenaphthylene, anthracene, 1, 2-benzanthracene, 3, 4-benzofluoranthene, benzo[k]-fluoranthene, 1, 12-benzoperylene, benzo[a]pyrene, chrysene, dibenzo[ah]anthracene, fluorene, indeno[1, 2, 3-cd]pyrene, phenanthrene and pyrene.

[27] PCBs (polychlorinated biphenyls) mean the sum of chlorinated biphenyls whose analytical characteristics resemble those of Aroclor-1016, Aroclor-1221, Aroclor-l232, Aroclor-1242, Aroclor-l248, Aroclor-1254 and Aroclor-1260.

[28] TCDD equivalents mean the sum of the concentration of chlorinated dibenzodioxins (2,3,7,8-CDDs) and chlorinated dibenzofurans (2,3,7,8-CDFs) multiplied by their respective toxicity factors, as shown in the table below:

Isomer Group	Toxicity Equivalence Factor
2,3,7,8-tetra CDD	1.0
2,3,7,8-penta CDD	0.5
2,3,7,8-hexa CDDs	0.1
2,3,7,8-hepta CDD	0.01
octa CDD	0.001
2,3,7,8-tetra CDF	0.1
l,2,3,7,8-penta CDF	0.05
2,3,4,7,8-penta CDF	0.5
2,3,7,8-hexa CDFs	0.1
2,3,7,8-hepta CDFs	0.01
octa CDF	0.001

[29] Concentration expressed as total recoverable.

[30] Effluent limits for radioactivity are based on Maximum Contaminant Levels (MCLs) specified in Title 22, Chapter 15, Article 5, Section 64443, California Code of Regulations.

[31] Nonchlorinated phenolic compounds mean the sum of Phenol, 2,4-Dimethylphenol, 2-Nitrophenol, and 4-Nitrophenol, 2,4-Dinitrophenol and 4,6-Dinitro-2-Methylphenol.

[32] Chlorinated phenolic compounds mean the sum of 2-Chlorophenol, 2,4-Dichlorophenol, 4-Chloro-3-methylphenol, 2,4,6-Trichlorophenol, and Pentachlorophenol.

[33] These constituents were determined to have no reasonable potential to exceed the respective water quality objective. However, the calculated performance goal is greater than the respective calculated Ocean Plan effluent limit. Therefore, effluent limit is prescribed as the performance goal.

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3. The pH of wastes discharged shall at all times be within the range of 6.0 and 9.0. [3]

4. The temperature of wastes discharged shall not exceed 100°F.

5. The arithmetic mean values, by weight, for effluent samples collected in a period of 30 consecutive calendar days shall not exceed 15 percent of the arithmetic mean of values, of $BOD_5 20^0C$ and the suspended solids by weight, for influent samples collected at approximately the same time during the same period. [3]

6. Waste discharged to the ocean must be essentially free of:

   a. Material that is floatable or will become floatable upon discharge.

   b. Settleable material or substances that may form sediments which will degrade benthic communities or other aquatic life.

   c. Substances that will accumulate to toxic levels in marine waters, sediments or biota.

   d. Substances that significantly decrease the natural light to benthic communities and other marine life.

   e. Materials that result in aesthetically undesirable discoloration of the ocean surface.

7. The City shall ensure that bacterial concentrations in the effluent discharge do not result in an exceedance of the Hyperion Treatment Plant waste load allocation of zero (0) days exceedance of single sample numeric limits [based on Basin Plan bacteria objectives for marine waters designated REC-1, see I.C.(Receiving Water Limitations).1.a.(2) below] at shoreline compliance points, as specified in Regional Board Resolution Nos. 2002-004 and 2002-022.

B. Mass Emission Caps

Mass emission caps are applied to four pollutants of concern identified by the SMBRP (copper, lead, silver, and zinc) that are causing or could cause deterioration of designated beneficial uses in Santa Monica Bay. Caps are set at 1995 allowable emission rates. The City should make best efforts to discharge these pollutants of concern below cap values. The Executive Officer and USEPA may modify any of the mass emission cap values, if the City requests and demonstrates that the change is warranted.

The mass emission caps are based on an average flow rate of 347 mgd and the average concentration of the pollutant of concern in 1995. If performance data showed nondetectable levels, one half of the detection limit was used to calculate an average concentration. Mass emission caps calculations are shown in the accompanying Fact Sheet.

Parameter	Mass Emission Cap (Lbs/year)
Copper	41,100
Lead	2,700
Silver	5,500

Zinc	59,100

C. Receiving Water Limitations

1. Bacterial Characteristics

a. Water Contact Standards

In marine water designated for water contact recreation (REC-1), the waste discharged shall not cause the following bacterial standards to be exceeded in the receiving water outside the initial dilution zone.

(1) Geometric Mean Limits
   (a) Total coliform density shall not exceed 1,000/100 ml.
   (b) Fecal coliform density shall not exceed 200/100 ml.
   (c) Enterococcus density shall not exceed 35/100 ml.

(2) Single Sample Limits
   (a) Total coliform density shall not exceed 10,000/100 ml.
   (b) Fecal coliform density shall not exceed 400/100 ml.
   (c) Enterococcus density shall not exceed 104/100 ml.
   (d) Total coliform density shall not exceed 1,000/100 ml, if the ratio of fecal-total coliform exceeds 0.1.

In addition, total coliform density shall not exceed 1,000/100 ml for more than 20 percent of the samples at any sampling station in any 30-day period.

The geometric mean values should be calculated based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period).

If any of the single sample limits are exceeded, the Regional Board may require repeat sampling on a daily basis until the sample falls below the single sample limit in order to determine the persistence of the exceedance.

When repeat sampling is required because of an exceedance of any one single sample limit, values from all samples collected during that 30-day period will be used to calculate the geometric mean.

b. Shellfish Harvesting Standards

At all areas where shellfish may be harvested for human consumption, as determined by the Regional Board, the waste discharged shall not cause the following bacterial standards to be exceeded:

The median total coliform density for any 6-month period shall not exceed 70 per 100 ml, and not more than 10 percent of the samples during any 6-month period shall exceed 230 per 100 ml.

c. If a shore station consistently exceeds a total or fecal coliform objective or exceeds a geometric mean enterococcus density of 24 organisms per 100 ml for a 30-day period, or 12 organisms per 100 ml for a six-month period, the Discharger may be required to conduct a sanitary survey to determine if the discharge is the source of the contamination. The geometric mean shall be a moving average based on no less than five samples per month, spaced evenly over the time interval. When a sanitary survey identifies a controllable source of indicator organisms associated with the discharge of sewage, the Discharger shall take action to control the source.

2. Physical Characteristics

The waste discharged shall not:

a. Cause floating particulates and oil and grease to be visible;

b. Cause aesthetically undesirable discoloration of the ocean surface;

c. Significantly reduce the transmittance of natural light at any point outside the initial dilution zone; and,

d. Change the rate of deposition of inert solids and the characteristics of inert solids in ocean sediments such that benthic communities are degraded.

3. Chemical Characteristics

The waste discharged shall not:

a. Cause the dissolved oxygen concentration at any time to be depressed more than 10 percent from that which occurs naturally;

b. Change the pH of the receiving waters at any time more than 0.2 units from that which occurs naturally;

c. Cause the dissolved sulfide concentration of waters in and near sediments to be significantly increased above that present under natural conditions;

d. Contain individual pesticides or combinations of pesticides in concentrations that adversely affect beneficial uses;

e. Cause the concentration of substances set forth in Chapter II, Table B of the Ocean Plan, in marine sediments to increase to levels that would degrade indigenous biota;

f. Cause the concentration of organic materials in marine sediments to be increased to levels that would degrade marine life; and,

g. Contain nutrients at levels that will cause objectionable aquatic growths or degrade indigenous biota.

4. Biological Characteristics

The waste discharged shall not:

a. Degrade marine communities, including vertebrate, invertebrate, and plant species;

b. Alter the natural taste, odor, and color of fish, shellfish, or other marine resources used for human consumption; and,

c. Cause the concentration of organic materials in fish, shellfish or other marine resources used for human consumption to bioaccumulate to levels that are harmful to human health.

5. Radioactivity

a. Discharge of radioactive waste shall not degrade marine life.

6. The waste discharged shall not cause a violation of any applicable water quality standard for receiving waters. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the CWA, or amendments, thereto, USEPA and the Regional Board will revise and modify this Order and permit in accordance with such standards.

II. BIOSOLIDS REQUIREMENTS

A. The Discharger shall comply with the requirements of 40 CFR 503, in general, and in particular the requirements in Attachment B of this Order and permit, [*Biosolids/sludge Management*]. These requirements are enforceable by USEPA.

B. The Discharger shall ensure compliance with the requirements in SWRCB Order No. 2004-10-DWQ, "General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural and Land Reclamation Activities" for those sites receiving the Discharger's biosolids which a Regional Water Quality Control Board has placed under this general order, and with the requirements in individual Waste Discharge Requirements issued by a Regional Board for sites receiving the Discharger's biosolids.

C. The Discharger shall comply, if applicable, with WDRs issued by other Regional Boards to which jurisdiction the biosolids are transported and applied.

D. The Discharger shall furnish this Regional Board with a copy of any report submitted to USEPA, State Board or other Regional Board, with respect to municipal sludge or biosolids.

III. PRETREATMENT REQUIREMENTS

A. This Order and permit include the Discharger's approved Pretreatment Program as an enforceable condition. The Discharger is required to implement and enforce the pretreatment program in its entire service area, including the contributing jurisdictions.

B. The Discharger shall evaluate whether its pretreatment local limits are adequate to meet the requirements of this Order and permit. Hyperion Treatment Plant is part of the Hyperion Treatment System, including Tillman WRP, LAGWRP, and Burbank WRP. In the reevaluation of local limits, the Discharger shall consider the effluent limitations contained in this Order and permit, and other relevant factors due to the interconnectedness of the system and protection of the upstream plants. The Discharger shall submit by December 1, 2005 to the Regional Board and USEPA the results of the evaluation indicating whether changes to the Discharger's local limits are needed. Any revised local limits shall be submitted to the Regional Board and USEPA for approval under 40 CFR 403.18 by December 1, 2006. In addition, the Discharger shall consider collection system overflow protection from such constituents as oil and grease, etc. Lack of adequate local limits shall not be a defense against liability for violations of effluent limitations and overflow prevention requirements contained in this Order and permit.

C. Any substantial modifications to the approved Pretreatment Program, as defined in 40 CFR 403.18(b), shall be submitted in writing to the Regional Board and USEPA and shall not become effective until Regional Board and USEPA approval is obtained.

D. The Discharger shall enforce the requirements promulgated under Sections 307(b), 307(c), 307(d), and 402(b) of the CWA with timely, appropriate, and effective enforcement actions. The Discharger shall require all nondomestic users subject to the federal categorical standards to comply with those standards and shall take enforcement actions against those users who do not comply with the standards. Such enforcement actions shall be consistent with an enforcement response plan, developed pursuant to 40 CFR 403.8(f)(5). The Discharger shall ensure that all nondomestic users subject to the federal categorical standards achieve compliance no later than the date specified in those requirements or, in the case of a new nondomestic user, upon commencement of the discharge.

E. The Discharger shall perform the pretreatment functions as required in Federal Regulations 40 CFR 403 including, but not limited to:

1. Implement the necessary legal authorities as provided in 40 CFR 403.8(f)(1);
2. Enforce the pretreatment requirements under 40 CFR 403.5 and 403.6;
3. Implement the programmatic functions as provided in 40 CFR 403.8(f)(2); and
4. Provide the requisite funding and personnel to implement the Pretreatment Program as provided in 40 CFR 403.8(f)(3).

F. The Discharger shall submit semiannual and annual reports to the Regional Board, and USEPA describing the Discharger's pretreatment activities over the period. The annual and semiannual reports shall contain, but not be limited to, the information required in the attached *Pretreatment Reporting Requirements* (Attachment P), or an approved revised version thereof. The Semi-Annual Report covers the periods from January 1 to June 30 and is due by September 1 of each year. A copy of the newspaper notice required under 40 CFR §403.8(f)(2)(vii) should be included in the Semi-Annual Report. A full scan of the priority pollutants for the influent and effluent should be conducted at least annually in July. If the Discharger is not in compliance with any conditions or requirements of this Order and permit, the Discharger shall include the reasons for noncompliance and shall state how and when the Discharger will comply with such conditions and requirements.

G. The Discharger shall be responsible and liable for the performance of all control authority pretreatment requirements contained in 40 CFR 403, including subsequent regulatory revisions thereof. Where Part 403 or subsequent revision places mandatory actions upon the Discharger as Control Authority but does not specify a timetable for completion of the actions, the Discharger shall complete the required actions within six months from the effective date of this Order and permit or the effective date of Part 403 revisions, whichever comes later. For violations of pretreatment requirements, the Discharger shall be subject to enforcement actions, penalties, fines, and other remedies by the Regional Board, USEPA, or other appropriate parties, as provided in the CWA. The Regional Board or USEPA may initiate enforcement action against a nondomestic user for noncompliance with applicable standards and requirements, as provided in the CWA and/or the California Water Code.

IV. PROHIBITIONS

A. Any discharge of wastes at any point other than specifically described in this Order and permit is prohibited, and constitutes a violation thereof.

B. The bypassing of untreated or partially treated wastes to the ocean is prohibited.

C. The discharge of municipal and industrial waste sludge directly to the ocean, or into a waste stream that discharges to the ocean, is prohibited.

D. The discharge of sludge digester supernatant and centrate directly to the ocean, or into a waste stream that discharges to the ocean without further treatment is prohibited.

E. The discharge of any waste resulting from the combustion of toxic or hazardous wastes to any waste stream that ultimately discharges to waters of the United States is prohibited, unless specifically authorized elsewhere in this Order and permit.

F. The discharge of any radiological, chemical, or biological warfare agent or high-level radioactive waste into the ocean is prohibited.

V. PROVISIONS

A. This Order shall serve as an NPDES permit pursuant to section 402 of the CWA, or amendments thereto. This Order and permit shall become effective 33 days from the date of signature by the USEPA Director.

B. This Order and permit include the attached "Standard Provisions, General Monitoring and Reporting Requirements". ("Standard Provisions", Attachment S) and "Pretreatment Reporting Requirements" (Attachment P). If there is any conflict between provisions stated hereinbefore and said "Standard Provisions" or Attachment P, those provisions stated hereinbefore prevail.

C. This Order and permit includes the attached Monitoring and Reporting Program (CI-1492) (M&RP, Attachment T). If there is any conflict between provisions stated in the Standard Provisions or Attachment P and the Monitoring and Reporting Program, those provisions in the latter prevail.

D. The wastes discharged shall comply with all applicable Ocean Plan and applicable Basin Plan requirements.

E. The City shall comply with all applicable effluent limitations, national standards of performance, toxic effluent standards, and all federal regulations established pursuant to Sections 301, 302, 303(d), 304, 306, 307, 316, 403, and 405 of the CWA and amendments thereto.

F. For biosolids/sludge management, the City must comply with all applicable requirements of 40 CFR sections 257, 258, 501, and 503, including all monitoring, record keeping, and reporting requirements.

G. The Discharger must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the CWA and the CWC and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification, or denial of a permit renewal application. Subparagraphs (1), (2), and (3) of 40 CFR 122.41(a) are incorporated into this permit by reference.

H. To address the uncertainty due to potential increases in toxic pollutant loadings from the Hyperion Treatment Plant discharge to the marine environment during the five-year permit term, and to establish a framework for evaluating the need for an antidegradation analysis to determine compliance with State and federal antidegradation requirements at the time of permit reissuance, 12-month average mass emission benchmarks have been established for effluent discharged through the 5-mile outfall (Discharge Serial No. 002) (see MRP VI.D.). These mass emission benchmarks were calculated based on the Regional Board and USEPA's evaluation of current effluent quality, using January 1999 through June 2004 effluent data, and the Discharger's projected end-of-permit flow of 400 mgd. Exceptions to this are mass emission benchmarks for copper, lead, silver and zinc which are based directly on Mass Emission Caps for these pollutants of concern in Santa Monica Bay, established by the Regional Board. Mass emission benchmarks are not enforceable water quality based effluent limitations. They may be re-evaluated and revised during the five-year permit term.

I. Compliance Determination

1. Compliance with single constituent effluent limitations - If the concentration of the pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the reported Minimum Level (see Reporting Requirements IV. A. of M&RP), then the Discharger is out of compliance.

2. Compliance with monthly average limitations - In determining compliance with monthly average limitations, the following provisions shall apply to all constituents:

   a. If the analytical result of a single sample, monitored monthly, quarterly, semiannually, or annually, does not exceed the monthly average limit for that constituent, the Discharger will have demonstrated compliance with the monthly average limit for that month.

   b. If the analytical result of any single sample, monitored monthly, quarterly, semiannually, or annually, exceeds the monthly average limit for any constituent, the Discharger shall collect up to four additional weekly samples. All five analytical results shall be reported in the monitoring report for that month, or the subsequent month. The concentration of pollutant (a numerical average or a median) estimated from the following Section V.I.3. will be used for compliance determination.

   c. In the event of noncompliance with a monthly average effluent limitation, the sampling frequency for that constituent shall be increased to weekly and shall continue at this level until compliance with the monthly average effluent limitation has been demonstrated.

   d. If only one sample was obtained for the month or more than a monthly period and the result exceeds the monthly average, then the Discharger is in violation of the monthly average limit.

3. When all sample results are greater than or equal to the reported Minimum Level (see Reporting Requirements IV. A. of *MRP*), the numerical average of the analytical results of these samples will be used for compliance determination

   When one or more sample results are reported as “Not-Detected (ND)” or “Detected, but Not Quantified (DNQ)” (see Reporting Requirements IV. D. of *MRP*), the median value of these samples will be used for compliance determination. If, in a even number of samples, one or both of the middle values is ND or DNQ, the median will be the lower of the two middle values.

4. Compliance with effluent limitations expressed as a sum of several constituents – If the sum of the individual pollutant concentrations is greater than the effluent limitation and greater than or equal to the Reported Minimum Level, then the Discharger is out of compliance. In calculating the sum of the

concentrations of a group of individual pollutants, consider constituents reported as ND or DNQ to have concentrations equal to zero.

5. Compliance with effluent limitations expressed as a median – In determining compliance with a median limitation, the analytical results in a set of data will be arranged in order of magnitude (either increasing or decreasing order); and

   a. If the number of measurements (n) is odd, then the median will be calculated as = $X_{(n+1)/2}$, or

   b. If the number of measurements (n) is even, then the median will be calculated as = $[X_{n/2} + X_{(n/2)+1}]/2$, i.e. the midpoint between the n/2 and n/2+1 data points.

J. In calculating mass emission rates from the monthly average concentrations, for compliance purpose, consider constituents reported as ND or DNQ to have concentrations equal to zero for the calculation of the monthly average concentrations.

K. Pollutant Minimization Program (PMP)

1. The goal of the PMP is to reduce all potential sources of a pollutant through pollutant minimization (control) strategies, including pollution prevention measures, in order to maintain the effluent concentration at or below the effluent limitation.

   Pollution prevention measures may be particularly appropriate for persistent bioaccumulative priority pollutants where there is evidence that beneficial uses are being impacted. The completion and implementation of a Pollution Prevention Plan, required in accordance with California Water Code Section 13263.3 (d) will fulfill the PMP requirements in this section.

2. The Discharger shall develop and conduct a PMP if all of the following conditions are true, and shall submit the PMP to the Regional Board and USEPA within 90 days of determining the conditions are true:

   a. The calculated effluent limitation is less than the reported minimum level;

   b. The concentration of the pollutant is reported as “Detected, but Not Quantified”, DNQ;

   c. There is evidence showing that the pollutant is present in the effluent above the calculated effluent limitation.

3. The Discharger shall also develop and conduct a PMP if all of the following conditions are true, and shall submit the PMP to the Regional Board and USEPA within 90 days of determining the conditions are true:

   a. The calculated effluent limitation is less than the method detection limit;

b. The concentration of the pollutant is reported as “Not-Detected”, ND;

c. There is evidence showing that the pollutant is present in the effluent above the calculated effluent limitation.

4. The Discharger shall consider the following in determining whether the pollutant is present in the effluent at levels above the calculated effluent limitation:

a. health advisories for fish consumption;

b. presence of whole effluent toxicity;

c. results of benthic or aquatic organism tissue sampling;

d. sample results from analytical methods more sensitive than methods included in the permit;

e. the concentration of the pollutant is reported as DNQ and the effluent limitation is less than the method detection limit.

5. Elements of a PMP. The PMP shall include actions and submittals acceptable to the Regional Board and USEPA including, but not limited to, the following:

a. An annual review and semi-annual monitoring of potential sources of the reportable pollutant, which may include fish tissue monitoring and other bio-uptake sampling;

b. Quarterly monitoring for the reportable pollutant in the influent to the wastewater treatment system;

c. Submittal of a control strategy designed to proceed toward the goal of maintaining concentrations of the reportable pollutant in the effluent at or below the calculated effluent limitation;

d. Implementation of appropriate cost-effective control measures for the pollutant, consistent with the control strategy; and,

e. An annual status report that shall be sent to the Regional Board and USEPA including:

- All PMP monitoring results for the previous year;
- A list of potential sources of the reportable pollutant;
- A summary of all action taken in accordance with control strategy; and,
- A description of actions to be taken in the following year.

L. Waste management systems that discharge to the ocean must be designed and operated in a manner that will maintain the indigenous marine life and a healthy and diverse marine community.

M. Waste effluents shall be discharged in a manner that provides sufficient initial dilution to minimize the concentrations of substances not removed in the treatment.

N. Location of waste discharge must assure the following:

1. Pathogenic organisms and viruses are not present in areas where shellfish are harvested for human consumption or in areas used for swimming or other body-contact sports.

2. Natural water quality conditions are not altered in areas designed as being of special biological significance or areas that existing marine laboratories use as a source of seawater.

3. Maximum protection is provided to the marine environment.

O. Waste that contains pathogenic organisms or viruses should be discharged a sufficient distance from shellfishing and water-contact sports areas to maintain applicable bacterial standards without disinfection. Where conditions are such that an adequate distance cannot be attained, reliable disinfection in conjunction with a reasonable separation of the discharge point from the area of use must be provided. Disinfection procedures that do not increase effluent toxicity and that constitute the least environmental and human hazard should be used.

P. The Discharger shall notify the Regional Board and USEPA immediately by telephone or electronically, but not later than 24 hours, of the presence of adverse conditions in the receiving waters or on beaches and shores as a result of the waste discharge; written confirmation shall follow as soon as possible but not later than five working days after notification.

Q. The Discharger shall provide standby or emergency power facilities and/or storage capacity or other means so that in the event of plant upset or outage due to power failure or other causes, the discharge of raw or inadequately treated sewage does not occur.

R. The City shall update and thereafter implement its updated contingency plan (including timely scheduling of construction and/or maintenance) for the Hyperion Treatment System involving, but not limited to, Tillman WRP, LAGWRP, North Outfall Replacement Sewer, North Outfall Sewer, North Outfall Treatment Facility, and the Hyperion Treatment Plant.

S. The Discharger shall notify the Executive Officer and USEPA in writing no later than six months prior to planned discharge of any chemical, other than chlorine or other product previously reported to the Executive Officer and USEPA, which may be toxic to aquatic life. Such notification shall include:

1. Name and general composition of the chemical,

2. Frequency of use,
3. Quantities to be used,
4. Proposed discharge concentrations, and
5. USEPA registration number, if applicable.

No discharge of such chemical shall be made prior to obtaining approval from the Executive Officer and USEPA.

VI. REOPENERS AND MODIFICATION

A. This Order and permit may be reopened and modified, to incorporate new limits based on future reasonable potential analyses to be conducted based on on-going monitoring data collected by the Discharger and evaluated by the Regional Board and USEPA.

B. This Order and permit may be reopened and modified, to incorporate new mass emission rates based on the current Hyperion Treatment Plant's design capacity of 450 mgd provided that the Discharger requests and conducts an antidegradation analysis to demonstrate that the change is warranted.

C. This Order and permit may be reopened and modified, in accordance with the provisions set forth in 40 CFR 122 and 124, to incorporate requirements for the implementation of the watershed protection management approach.

D. This Order and permit may be modified, in accordance with the provisions set forth in 40 CFR 122 and 124, to include new MLs.

E. This Order and permit may be reopened and modified, to revise effluent limitations as a result of future Basin Plan Amendments or the adoption of a TMDL for Santa Monica Bay Watershed Management Areas.

F. The Board or USEPA may modify, or revoke and reissue this Order and permit if present or future investigations demonstrate that the discharge(s) governed by this Order and permit will cause, have the potential to cause, or will contribute to adverse impacts on water quality and/or beneficial uses of the receiving waters.

G. This Order and permit may be modified, revoked, and reissued or terminated in accordance with the provisions of 40 CFR 122.44, 122.62 to 122.64, 125.62, and 125.64. Causes for taking such actions include, but are not limited to, failure to comply with any condition of this Order and permit, endangerment to human health or the environment resulting from the permitted activity, or acquisition of newly obtained information which would have justified the application of different conditions if known at the time of Order and permit adoption and issuance. The filing of a request by the Discharger for an Order and permit modification, revocation, and issuance or termination, or a notification of planned changes or anticipated noncompliances does not stay any condition of this Order and permit.

H. This Order and permit may be modified, or revoked and reissued, based on the results of Magnuson-Stevens Fishery Conservation and Management Act and/or

Endangered Species Act section 7 consultation(s) with the National Marine Fisheries Service and/or the U.S. Fish and Wildlife Service.

VII. EXPIRATION DATE

A. This Order and permit expires on **May 14, 2010**.

B. The Discharger must file a Report of Waste Discharge and NPDES application in accordance with Title 23, CCR and 40 CFR 122.21(d), respectively, not later than 180 days in advance of the expiration date as application for issuance of new waste discharge requirements.

VIII. RESCISSION

Order No. 94-021 adopted by this Board on February 28, 1994, and NPDES permit No. CA0109991 issued by USEPA on April 1, 1994 are hereby rescinded upon the effective date of this Order and permit, except for purposes of enforcement.

The signatures below certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on April 7, 2005, and of a National Pollutant Discharge Elimination System permit issued by the United States Environmental Protection Agency, Region IX.

Jonathan Bishop,
Executive Officer
California Water Quality Control Board
Los Angeles Region

Date:_____

Alexis Strauss,
Director
Water Division
USEPA Region IX

Date: _____

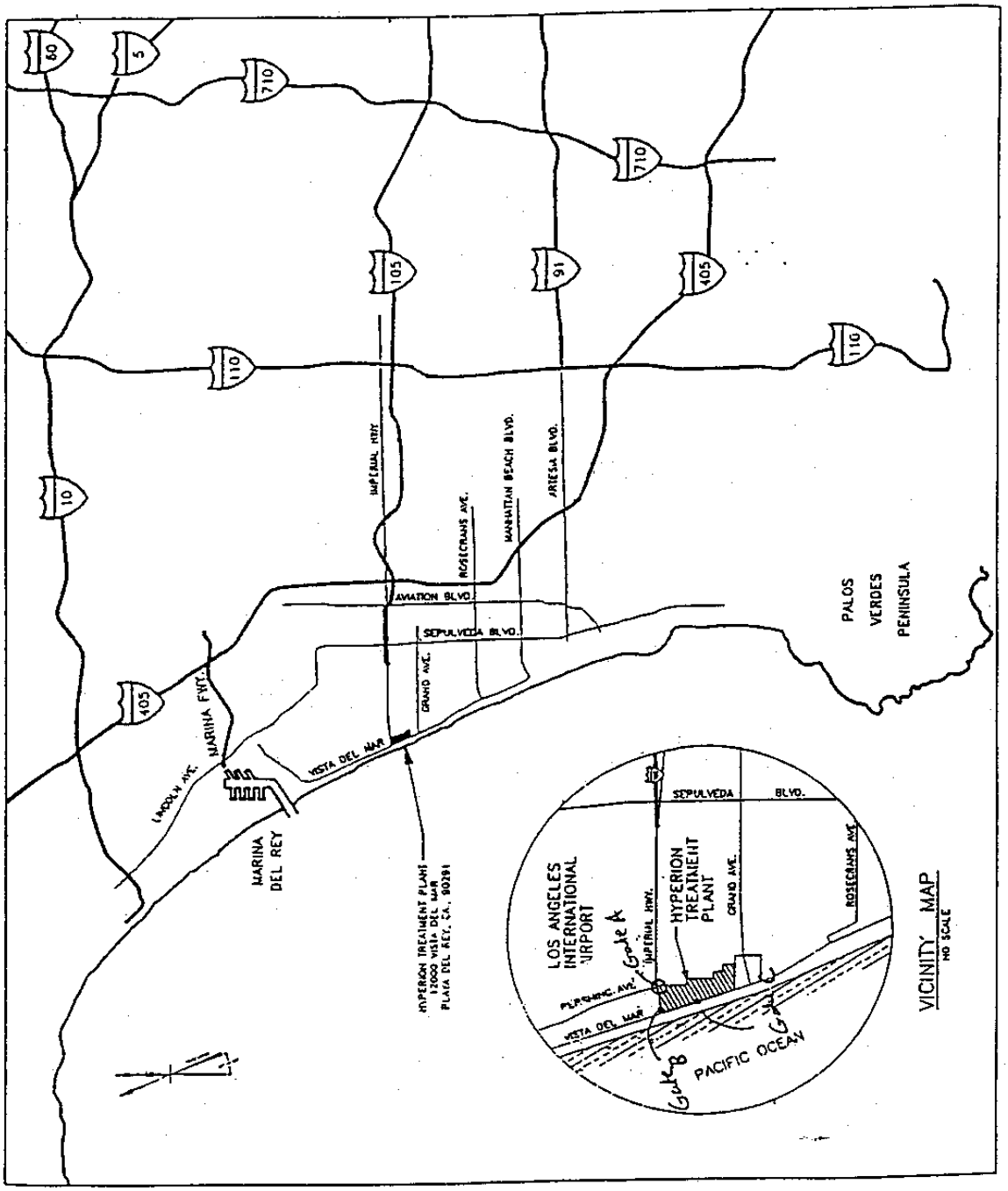


Figure 1
HYPERION TREATMENT PLANT LOCATION MAP

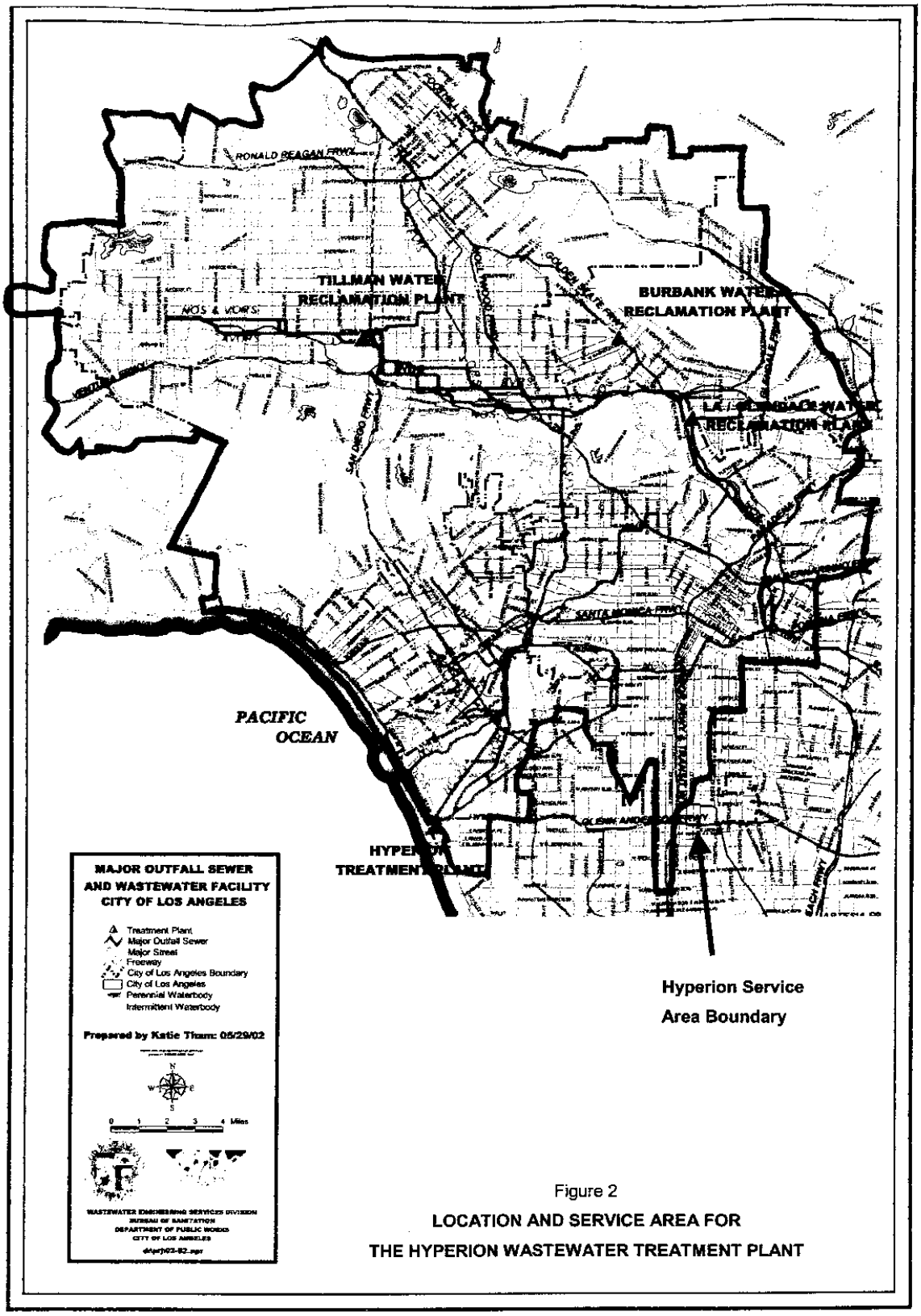


Figure 2
LOCATION AND SERVICE AREA FOR
THE HYPERION WASTEWATER TREATMENT PLANT

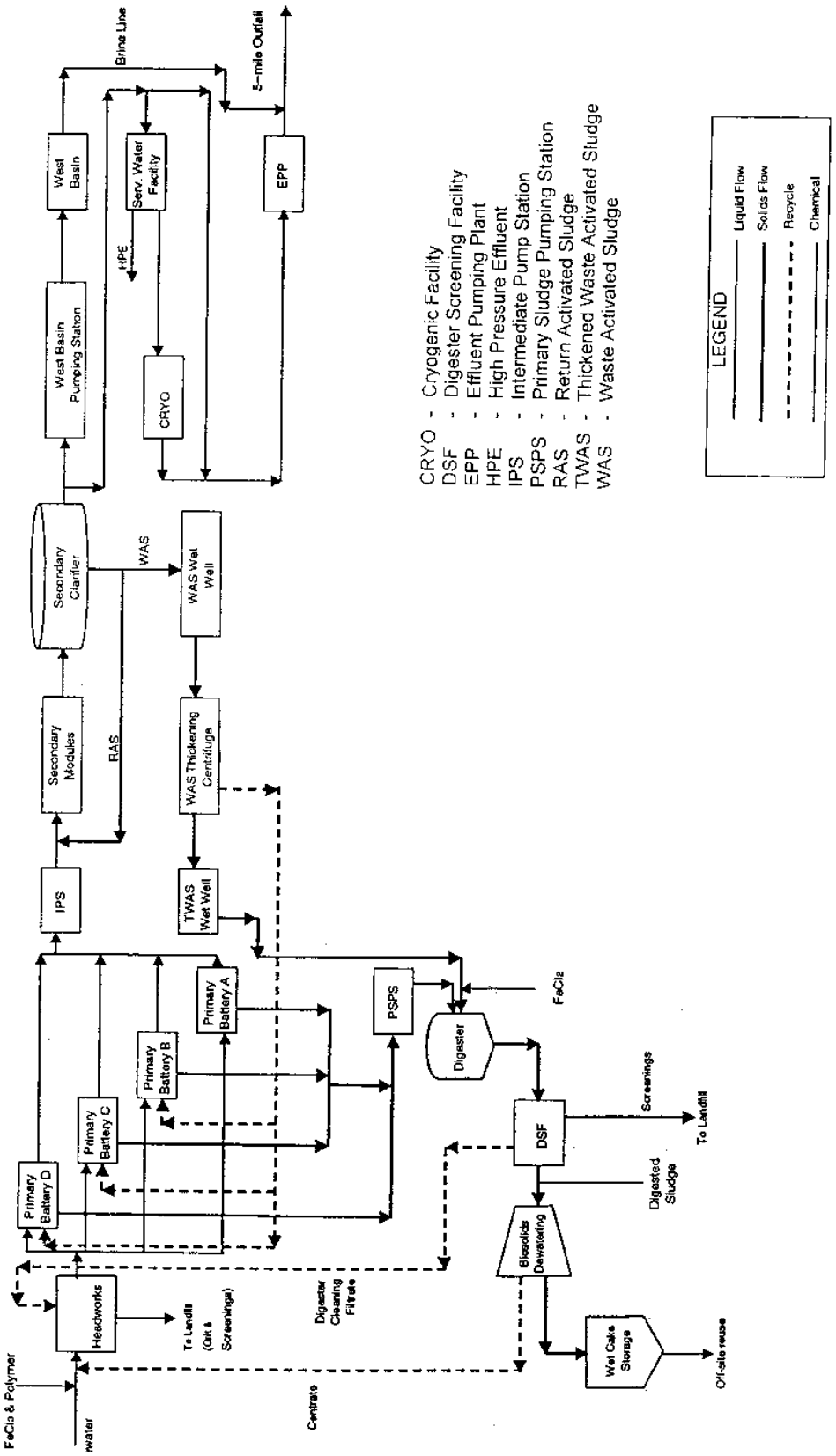


Figure 3
A SCHEMATIC PRESENTATION OF WASTEWATER FLOW AT HYPERION TREATMENT PLANT

APPENDIX D: CULTURAL RESOURCES: ARCHAEOLOGICAL RESOURCES

APPENDIX D.i:
ANALYSIS FOR ALIGNMENTS OF THE RIPARIAN CORRIDOR THROUGH THE VILLAGE AT PLAYA VISTA TO PRESERVE IN PLACE ARCHAEOLOGICAL RESOURCES, PSOMAS AND ASSOCIATES, APRIL 2008.

ANALYSIS FOR ALIGNMENTS OF THE RIPARIAN CORRIDOR THROUGH THE VILLAGE AT PLAYA VISTA TO PRESERVE IN PLACE ARCHAEOLOGICAL RESOURCES

For

PLAYA CAPITAL COMPANY, LLC

By

Michael J. Crehan, P.E.
PSOMAS
555 South Flower Street, Suite 4400
Los Angeles, CA 90071

April, 2008

Table of Contents

Section	Description	Page
I.	OBJECTIVE	1
II.	SITE CONDITIONS	1
	A. November 2002 Conditions – On-Site	1
	B. November 2002 Conditions – Off-Site	2
	C. Archaeological Areas	3
	D. November 2002 Drainage – Off-Site	3
	E. November 2002 Drainage – On-Site	4
	F. September 2004 Conditions	5
	G. Current Conditions	6
III.	METHODOLOGY	6
IV.	OPTIONS ANALYSIS	6
	A. Common Constraints / Assumptions of Design	6
	B. Common Design Solutions	7
	C. Option 1	7
	D. Option 2	9
	E. Option 3	11
	F. Option 4	12
	G. Other Options	13
V.	SUMMARY	14
VI.	EXHIBITS	
	A. Exhibit 1 – Vesting Tentative Tract Map 60110	
	B. Exhibit 2 – Existing Conditions and Constraints	
	C. Exhibit 3 – Existing Drainage	
	D. Exhibit 4 – Option 1	
	E. Exhibit 5 – Option 2	
	F. Exhibit 6 – Option 3	
	G. Exhibit 7 – Option 4	
	H. Exhibit 8 – Option 5	
	I. Exhibit 9 – Option 6	
VII.	APPENDICES	
	A. Permits	

I. OBJECTIVE

This analysis is prepared to evaluate realignment options related to drainage and infrastructure concerning a discussion of preserving in place two archaeological areas located within the proposed Village at Playa Vista project (the Proposed Project). This primarily involves evaluating options for the alignment and configuration of the Riparian Corridor.

The Riparian Corridor, which is now completely constructed, is an open channel with native riparian, willow scrub, freshwater marsh, and upland habitat along the southerly edge of the Proposed Project. The channel is a graded channel with relatively shallow side slopes of a 3:1 ratio with some areas widened to as much as 100 feet across. There are three areas of the channel that due to space constraints consist of vertical concrete walls on each side with a natural bottom. The Riparian Corridor is part of the 51 acre Freshwater Wetland System which includes the Freshwater Marsh (FWM) on the west side of Lincoln Boulevard. This system serves multiple purposes, including flood control, storm water conveyance, water quality enhancement, and habitat restoration. The Riparian Corridor within the Proposed Project is approximately 6.7 acres. The Riparian Corridor for both the Playa Vista First Phase Project and the Proposed Project is 25 acres.

This analysis also requires that the extension of Bluff Creek Drive, the most southerly roadway within the Proposed Project area, be relocated northerly to avoid the archaeological areas. (See Exhibit 1 – Vesting Tentative Tract Map 60110). All discussion of conditions refers to three time periods: the Notice of Preparation which was circulated for the Village at Playa Vista EIR in November 2002; as well as the date of the City of Los Angeles original certification of the EIR in September 2004; and the date of this report (March 14, 2008).

II. SITE CONDITIONS

A. November 2002 Conditions – On-Site

The Proposed Project area is shown on Exhibit 1. The area is bounded by Dawn Creek Street to the west, Jefferson Boulevard to the north, the Westchester Bluffs (the Bluffs) and Millennium Avenue to the south, and Campus Center Drive and Westlawn Avenue to the east. The topography of the majority of the Proposed Project site was relatively flat, ranging in elevation from approximately three feet at the flowline of the Centinela Ditch (a small dirt ditch that during the Helicopter Plant operation served as the only stormwater conveyor) to twenty-eight feet above mean sea level. Note that all elevations are relative to mean sea level. The Bluffs along the south edge rise to an elevation of approximately fifty to sixty feet at the boundary of the Proposed Project site, and continue to elevations over one-hundred feet.

In November 2002, the Proposed Project site was vacant except for former plant site buildings, with remnants of past manufacturing and airstrip uses. Two buildings remained from the former Hughes Aircraft Company/McDonald Douglas Helicopter plant. Building 22 was a warehouse used for storage and Building 45 was used occasionally for filming and other activities. In addition, small storage sheds in a Salvage Yard area existed at the base of the Bluffs on the archaeological areas. Minor storage structures and construction trailers associated with development of the adjacent Playa Vista First Phase Project also existed in the former Salvage Yard area of the Proposed Project site.

In November 2002, the Proposed Project site was used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, including stockpiling excavated soils, temporary stormwater detention, rock crushing and stockpiling, and equipment staging and parking. A roadway that bisects the Proposed Project site (Runway Road) was also under construction as part of the Playa Vista First Phase Project, to connect the east and west ends of the Playa Vista First Phase Project site. Stockpiles of soils excavated in the Playa Vista First Phase Project area were located throughout the Proposed Project site under permits issued by the City of Los Angeles Department of Building and Safety. Relevant permits issued by the City for these First Phase Project activities in the Proposed Project site are in the Appendix. One of the large stockpiles can be seen on Exhibit 2 toward the southwest portion of the Proposed Project. This stockpile varied from fifteen to twenty eight feet high. Between this stockpile and Runway Road was a large temporary detention basin used for control of flooding and siltation runoff during construction. This basin was constructed pursuant to a City of Los Angeles Building and Safety permit and Department of Public Works approval of the site-wide erosion control plan, and maintained per the site wide storm water pollution prevention plan (SWPPP). All of the permits issued were updated as required to ensure they provided for the current and ongoing construction and changing site conditions. Other erosion control measures included installation of sandbags, silt fencing, construction entrances, dewatering standpipes, and other storm detention basins. The erosion control permits were required in conjunction with development of the adjacent Playa Vista First Phase project to prevent either general or localized erosion of soils with the potential of undercutting a portion of the bluffs within the Proposed Project site, to prevent flooding in the low lying areas of the existing occupied buildings in the easterly First Phase area, and to prevent siltation in the existing FWM and existing public storm drains to the west. Some paved areas existed along the alignment of Teale Street (a private street) and along a portion of the area southerly of the existing buildings and sheds to the Bluffs. (See Exhibit 2)

B. November 2002 Conditions – Off-Site

Proposed and existing improvements for the adjacent Playa Vista First Phase Project include grading, public streets, utilities, and two portions of the Riparian Corridor consisting of approximately two thirds of its overall length. At the time of the circulation of the Notice of Preparation in November 2002, none of the Riparian Corridor within the

adjacent Playa Vista First Phase areas was constructed. However, in 2002, some of the other First Phase improvements were under construction. The majority of the FWM was constructed and functioning at that time, including two of its three major drainage inlets, its drainage outlet, and the planting of native plant material. A small portion at its southerly end was not completed to allow future installation of a storm drain by Caltrans under Lincoln Boulevard that was to connect the FWM and the Riparian Corridor. All of the portions of the Centinela Ditch within the First Phase Project areas had been filled.

C. Archaeological Areas

There are two archaeological areas within the Proposed Project site, known as LAN 211/H and LAN 62 Locus D. These areas are located primarily on and along the toe of the Bluffs. Approximately two thirds of the areas identified as archaeological areas north of the Bluffs were under existing buildings and parking lot areas, with the remainder under undeveloped and partially disturbed areas.

D. November 2002 Drainage – Off-Site

Stormwater drainage flows generated from areas outside the Proposed Project boundary were conveyed into the Proposed Project area. These off-site areas can be defined as coming from the south from the Bluffs and developed areas above the Bluffs, from the east in the area that ultimately would include the easterly portion of the Riparian Corridor, and from the east within storm drain pipes in Bluff Creek Drive and Millennium Avenue. This includes 118 acres within the easterly portion of the First Phase project and 65 acres of other off-site areas. The first three off-site flows noted above (from the Bluffs, the proposed easterly Riparian Corridor area, and the storm drain in Bluff Creek Drive) conveyed flows over the archaeological areas. The fourth off-site flow from Millennium Avenue drained into the temporary detention basin which filled during storm flows backing into the Centinela Ditch adjacent to the archaeological areas. The patterns and flow rates of these off-site flows, as well as for the on-site flow patterns, are indicated on Exhibit 3 – Existing Drainage.

Drainage from areas above the Bluffs was collected and conveyed onto the Proposed Project area via three drainage systems, two circular pipes of 15 inches and 21 inches diameter and a large irregularly shaped concrete structure. These conveyance structures are shown on Exhibits 2 and 3. Drainage from the Bluffs was separated into flows above and below Cabora Road. Cabora Road is a 20 foot wide paved trail approximately one-third the way up the Bluffs providing access to the City of Los Angeles North Outfall Sewer (NOS), a large existing brick and concrete arched sewer approximately twelve feet in diameter. The drainage from the portion of the Bluffs above the NOS collected along Cabora Road and was routed into one of the three drainage structures. These structures drained directly onto the flatter, low lying areas of the Proposed Project with only the larger central structure draining into a small pipe and open ditch that was only intended for nuisance flows. Any flows much more than dry-weather flows from this drain as well as the other two drains flowed across paved or dirt areas. The drainage from the portion

of the Bluffs below the NOS ran off the slopes in a "sheet" flow (a shallow semi-uniform flow over a large area) directly down to the flatter areas of the Proposed Project at the toe of the Bluffs.

From the east, off-site stormwater drainage flows were conveyed into the Proposed Project via the area where the easterly portion of the Riparian Corridor would ultimately be built, and through a storm drain pipe intended to tie into the Riparian Corridor in the Proposed Project. These flows are generated from approximately two-thirds of the First Phase portion of the project site east of Westlawn Avenue (118 acres), as well as an approximately 65 acre area outside the Playa Vista area from the Bluffs.

The off-site storm drainage flows generated from the remaining approximately one-third of the First Phase portion of the Playa Vista area east of Campus Center Drive were collected, routed, and discharged from a 72 inch pipe into the Proposed Project at the Millennium / Westlawn intersection. These flows did not flow across the archaeological areas and are not included in this analysis.

E. November 2002 Drainage – On-Site

Drainage within the Proposed Project was slow moving with ill defined flow patterns. The Proposed Project area was extremely flat with generally no local flow path directionality. However, overall flows traveled in an east to west direction due to the existing Centinela Ditch alongside Teale Street along the southerly portion of the Proposed Project (See Exhibits 2 and 3). All of the on-site and off-site storm drainage flows were ultimately conveyed to a temporary detention basin and discharged into an existing public storm drain in Runway Road just east of Dawn Creek Street. All drainage north of Millennium Avenue did not flow adjacent to or across the archaeological areas. During storm events, the drainage within and adjacent to the Centinela Ditch ponded on or flowed over the archaeological areas as discussed below. An understanding of these drainage conditions is required as a baseline condition to evaluate drainage and infrastructure options to discuss preservation in place of the archaeological areas.

Significant stormwater flows were conveyed to the Centinela Ditch. This included all of the flows from the Bluffs, the area where the easterly portion of the Riparian Corridor would be later constructed, as well as some drainage from the more southerly areas of the Proposed Project. The Centinela Ditch and a portion of the surrounding area were lower in elevation than the proposed portion of the Riparian Corridor into which these areas were to drain. The Centinela Ditch had a flow-line of less than three feet. The proposed Riparian Corridor flow-line at Dawn Creek Street was at an elevation of 4.8 feet (the elevation in November 2002 varies from 10 to 17 feet at this location). In addition, the outlet of the drain at Runway Road was at an elevation of 6.0 feet. This caused controlled ponding during storm events in all areas of the Proposed Project less than an elevation of 6.0 feet. This ponding was generally contained within the Centinela Ditch and an existing detention basin as shown on Exhibits 2 and 3. This detention basin served both a water quality and stormwater drainage function. The basin primarily

ensured that all stormwater during the construction phasing was controlled. This detention basin was approximately 11 acres in size and could flood up to six feet deep to an elevation of approximately nine feet. Without the detention basin, flooding could have occurred in both the easterly and westerly portions of the Playa Vista First Phase project. The design of the basin was such that it allowed containment and metered discharge of flows into the storm drain in Runway Road over a 72 hour period. This period was chosen to facilitate vector control and to allow settlement of siltation for water quality purposes.

A review of the drainage at or adjacent to the archaeological areas in November 2002 indicates that this drainage had various possible effects. First, without maintenance, flows in the Centinela Ditch could have caused erosion, resulting in exposure and damage to adjacent archaeological strata. Second, the three existing drainage structures from the Bluffs all drained onto the ground surface except for a small pipe and swale that conveyed nuisance flows for the central structure to the Centinela Ditch. The drainage from the two more easterly structures crossed both paved and unpaved areas. The westerly structure crossed only unpaved area. Without regular maintenance, over time these drains would have eroded the soil in the unpaved areas and degraded and eventually eroded the pavement and soil in the paved areas. This erosion could scour the soils, which can be described as concentrated erosion through rivulets, gulleys, and even channelization. Flows from the central structure in particular due to its high flow rate had the potential to significantly damage the surrounding areas, including the archaeological strata. Third, the existing ground elevation in the portion of the archaeological areas south of the proposed Bluff Creek Drive alignment and north of the toe of the Bluffs varied from an elevation of approximately nine to seventeen feet. This topography resulted in semi-permanent standing water with ponding in areas that had no outlet. This ponding would only dissipate through evaporation and soaking into the soils over time. The drainage from these areas could result in up to eight feet of ponded water that would have inundated any archaeological strata. As a part of the erosion control plan, ponded stormwater was periodically pumped to prevent such ponding.

F. September 2004 Conditions

Conditions in September 2004 differed from November 2002 in that the Riparian Corridor within the western portion of the area of the Playa Vista First Phase project was under construction, allowing some local drainage infrastructure to be installed. Within the Proposed Project, the erosion control measures were adjusted to meet differing site conditions. Relevant permits issued by the City for these First Phase Project activities in the Proposed Project site are in the Appendix. These adjustments included filling of a portion of the Centinela Ditch to reduce ponding in the southerly portion of the Proposed Project area and to drain that area to the temporary detention basin. From a drainage analysis standpoint for preservation of the archaeological areas, the conditions in 2004 are not materially different from 2002 conditions.

G. Current Conditions

Current conditions are significantly different in that essentially all the Playa Vista First Phase infrastructure has been constructed except for the south end of the FWM. The Riparian Storm Drain under Lincoln Boulevard was completed in April of 2008. Within both the Playa Vista First Phase and the Proposed Project, the Riparian Corridor and all storm drainage infrastructure has been installed and is functioning. From a drainage perspective this reduces the possibility of flooding to a level of insignificance, and meets all criteria of the approval agencies and best engineering practice.

III. METHODOLOGY

An analysis of the hydrology (amount of stormwater runoff) and hydraulics (physical effects of the stormwater) for the Proposed Project was prepared using the methodology of City of Los Angeles Hydrology Manual. For this analysis, off-site hydrology remains constant for all options. Any differences in on-site hydrology between the options are insignificant. Therefore, this analysis is a comparison of hydraulic conditions between the options, meaning a comparison of how the drainage is conveyed either on the ground surface or through a storm drain structure. The analysis uses the City of Los Angeles methodology and other design criteria.

IV. OPTIONS ANALYSIS

In analyzing the potential options to preserve in place archaeological areas, some common constraints, assumptions of design, and design solutions occur.

A. Common Constraints / Assumptions of Design:

1. Limits of the mapped archaeological areas are as provided by SRI.
2. This analysis assumes that no alteration of the Playa Vista First Phase will occur since these areas are outside the scope of the Proposed Project.
3. Topography from 2002 is used as the starting point.
4. Flow patterns and characteristics within the Proposed Project are from conditions in November 2002.
5. The analysis assumes that the portions of the Riparian Corridor within the Playa Vista First Phase development areas will be constructed as approved as these areas are outside the scope of the Proposed Project.
6. Consistent with regional transportation requirements, Bluff Creek Drive (which extends into the Playa Vista First Phase area) is built to modified secondary arterial roadway standards.
7. This analysis assumes that grading in the archaeological areas is eliminated or minimized to the greatest extent feasible.

8. This analysis assumes that no additional fill will be placed to cover the archaeological areas as remediation of contamination and removal of buildings, asphalt and substructures would be required prior to the placement of additional fill.
9. This analysis assumes that no drainage facilities can be placed into the archaeological areas if they would disturb the ground.
10. Grading and ground disturbance may occur outside and adjacent to the archaeological areas within the Proposed Project site.
11. Storm drain infrastructure may be routed or retrofitted within existing public rights-of-way outside the Proposed Project site.

B. Common Design Solutions:

1. At a minimum, a portion of Bluff Creek Drive must be realigned to the north to avoid a portion of the archaeological area from McConnell Avenue to Westlawn Avenue.
2. Retaining walls must be constructed along a portion of Bluff Creek Drive east of Dawn Creek Street to allow the connection of Bluff Creek Drive between the Playa Vista First Phase project and the Proposed Project to avoid the archaeological areas.
3. To maintain as much of the original design intent as possible, a portion of the Riparian Corridor (as a vegetated open channel) can be constructed easterly of the archaeological areas.

C. Option 1:

Option 1 is indicated on Exhibit 4. Under this option, Bluff Creek Drive would have been moved to the north, out of the archaeological areas. This option would have completely eliminated all construction activity within the archaeological areas. The option would have extended the Riparian Corridor from the east as a widened open channel to approximately ten feet from the archaeological area. The existing ground elevations at this easterly edge of the archaeological area varied from 13 to 16 feet. The flowline elevation of the Riparian Corridor just east of the archaeological area would have been approximately 11.1 feet. The Riparian Corridor flow-line elevation adjacent to Westlawn Avenue would have been approximately 11.6 feet. This would have resulted in permanent ponding of water in this portion of the easterly Riparian Corridor backing up to the east to the end of the Riparian Corridor.

On the westerly boundary of the Proposed Project opposite Dawn Creek Street, the Riparian Corridor would have needed significant erosion protection and a transition structure to the Riparian Corridor within the Playa Vista First Phase area. This could have been accomplished by construction of a concrete headwall to match existing elevations and accept flows from the undisturbed areas easterly of this point, and installation of either a large stone or concrete spillway. The

flow-line elevation of the Riparian Corridor at this point would have been approximately 4.8 feet while the existing ground elevation would have varied from approximately 11 to 15 feet.

The proposed elevations required for Bluff Creek Drive would have varied between approximately 18 and 27 feet. The existing ground elevations along the southerly edge of the alignment Bluff Creek Drive would have varied between less than 3 (at the flowline of the Centinela Ditch) and 14 feet. In some locations along the southerly edge of Bluff Creek Drive there would have been sufficient separation distance to allow transitional edge of road grading without the need for retaining walls which would have avoided the archaeological areas. This could have resulted in grades adjacent to Bluff Creek Drive varying from approximately 11 to 14 feet. These elevations would have undulated up and down along Bluff Creek Drive causing localized ponding. These ponding areas would have varied in size from a few square feet to thousands of square feet.

Drainage from the Bluffs and from areas to the east of the Proposed Project from even minor storm events would have flowed into the archaeological areas. This uncontrolled drainage would have caused significant erosion and ponding. In the dirt areas, this would have caused degradation of the surface and significant transport of soils. In the paved areas, the drainage would eventually have degraded the pavement ultimately washing it out. This would again have resulted in erosion of the underlying soils. It is anticipated that gullies would have formed as deep as six to eight feet before equilibrium for the flows would have been reached. Given the fact that the archaeological resources were close to the surface, the erosion could have significantly impacted the resources. The ponding would also have resulted in vector control problems. This uncontrolled flow would have been very inefficient hydraulically.

a) Advantages Compared to the Project:

1. This option would have required no grading in the archaeological areas.

b) Disadvantages Compared to the Project:

1. Due to flooding, ponding, and additional erosion, from a hydraulic standpoint this option would have been less efficient than the Proposed Project for dry weather flows and any storm event.
2. Flooding could have occurred in the First Phase areas of the Riparian Corridor easterly of Westlawn Avenue to an elevation of approximately 14 to 15 feet. This could have affected on-site drainage of developed areas possibly causing flooding within

existing historic buildings which have ground floor elevations as low as 15.7 feet.

3. Permanent ponding could have occurred in portions of the Riparian Corridor within the Proposed Project and the Playa Vista First Phase area to the east causing maintenance and vector control issues.
4. During storm events, drainage from the easterly portion of the Riparian Corridor conveyed into the undisturbed area could have caused significant and accelerated erosion along and through the archaeological areas, the toe of the Bluffs, and the toe of the proposed Bluff Creek Drive. Eventually, this could have undermined the roadway and the Bluffs, and exposed archaeological strata.
5. The existing drainage structures from the Bluffs could have eroded and damaged their outlet areas potentially undermining the Bluffs, the Bluff Creek Drive roadway, and archaeological strata.
6. Additional structural protection (i.e., concrete, rip-rap, etc.) would have been required at the portion of the Riparian Corridor west of Dawn Creek due to the difference in elevation of the existing ground and Riparian Corridor of approximately six to ten feet.
7. This option would have required retrofit of a portion of the Riparian Corridor in the Playa Vista First Phase area south of Dawn Creek to eliminate erosion as shown on Exhibit 4.
8. This option would not have met the City of Los Angeles design criteria of collecting and routing stormwater flows in a continuous system.
9. This option would not have followed generally accepted best engineering practices.

D. Option 2:

Option 2 is indicated on Exhibit 5. As in Option 1, Bluff Creek Drive would have been relocated to the north out of the archaeological areas. The Riparian Corridor again would have been extended from the east end up to the archaeological areas. In this option, drainage would have been addressed for the off-site stormwater through the archaeological areas. A large reinforced concrete box storm drain up to approximately 6 feet tall by 15 feet wide would have been installed within Bluff Creek Drive to route the flows from the Riparian Corridor on the east end to the Riparian Corridor on the west end. In addition, the storm drain structures discharging flows from the Bluffs would have been routed around or through the archaeological areas. The flows from the most easterly structure could have been routed around without impact to the archaeological areas by use of a graded swale outside the archaeological areas. The drainage from the two other drainage outlets could have been conveyed across the

archaeological areas via concrete swales or box structures placed on the ground. If concrete swales were not installed, significant erosion would have resulted in the archaeological areas as described in Option 1. However, with the installation of concrete swales, some impact would have occurred in order to create a suitable ground surface and supporting graded base underneath the structure. Some depth of soils removal (usually a minimum of two feet) would normally have been removed to meet the City of Los Angeles Departments of Public Works and Building & Safety requirements, and then would have been replaced with soils allowing acceptable compaction to create a stable surface to install the structure. Through a modification of City Code a less intrusive method could have been allowed; however, this could have resulted in cracking and warping of the structure, and possibly early replacement and failure of the structure. Once these swales would have passed through the archaeological areas, they could have connected to the concrete box in Bluff Creek Drive. Compaction of the soils and construction of the swales could have impacted the archaeological resources due to the shallow depth of the resources.

Drainage from the Bluffs outside the three drainage structures from storm events would have flowed into the archaeological areas. This uncontrolled drainage would have caused erosion and ponding. In the dirt areas, this would have caused degradation of the surface and transport of soils. In the paved areas, the drainage eventually would have degraded the pavement, ultimately washing it out. This would again have resulted in erosion of the underlying soils. It is anticipated that gullies would have formed before equilibrium for the flows would have been reached. This erosion could have impacted the archaeological resources due to their shallow depth. The ponding would also have resulted in vector control problems. This uncontrolled flow would have been inefficient hydraulically.

a) Advantages Compared to the Project:

1. This option would have required less grading and disturbance in the archaeological areas than the Proposed Project.

b) Disadvantages Compared to the Project:

1. Due to ponding and additional erosion, from a hydraulic standpoint this option would have been less efficient than the Proposed Project for dry weather flows and any storm event.
2. Semi-permanent ponding would have occurred in the undisturbed areas causing maintenance and vector control issues.
3. Additional structural protection (i.e. concrete, rip-rap, etc.) would have been required at the portion of the Riparian Corridor south of Dawn Creek Street due to the difference in elevation of the

existing ground and the Riparian Corridor of approximately six to ten feet.

4. Erosion still would have occurred inside and outside areas of archaeological strata from the drainage from the Bluffs outside the three drainage structures.

E. Option 3:

This option is indicated on Exhibit 6. In this option both Bluff Creek Drive and the Riparian Corridor would have been moved to the north such that to the maximum extent possible the Riparian Corridor as an open channel would have been maintained. To provide a continuous water course and eliminate flooding, a storm drain box structure toward the west end would have been constructed to connect to the Riparian Corridor within the western portion of the Playa Vista First Phase project. In addition, the storm drainage structures from the Bluffs would also have been connected to the Riparian Corridor in a similar manner as for Option 2.

Due to the realignment of the Riparian Corridor north, the length of the Corridor would have increased. This would have required the Riparian Corridor to have a shallower slope to meet the existing flowline elevations at each end. This would have required the Riparian Corridor to be widened or deepened (or both) in order to carry the same amount of flow. This would have been a less efficient design resulting in an increase in sediment deposition and ponding compared to the Proposed Project's Riparian Corridor, and increased frequency of maintenance to reestablish the flowline gradient to convey the drainage. Reestablishing the flowline could have entailed having construction equipment (such as bulldozers or backhoes) placed into the Riparian Corridor to dredge the bottom.

As in Option 2, drainage from the Bluffs outside the three drainage structures from storm events would have flowed into the archaeological areas. This uncontrolled drainage would have caused erosion and ponding. In the dirt areas, this would have caused degradation of the surface and transport of soils. In the paved areas, the drainage eventually would have degraded the pavement ultimately washing it out. This would again have resulted in erosion of the underlying soils. It is anticipated that gullies would have formed before equilibrium for the flows would have been reached. This erosion could have impacted the archaeological resources due to their shallow depth. The ponding would also have resulted in vector control problems. This uncontrolled flow would have been inefficient hydraulically.

a) Advantages Compared to the Project:

1. This option would have required less grading and disturbance in the archaeological areas than the Proposed Project.

b) Disadvantages Compared to the Project:

1. Due to ponding and additional erosion, from a hydraulic standpoint this option would have been less efficient than the Proposed Project for dry weather flows and any storm event.
2. Semi-permanent ponding would have occurred in the undisturbed areas causing maintenance and vector control issues.
3. Additional structural protection (i.e. concrete, rip-rap, etc.) would have been required at the portion of the Riparian Corridor south of Dawn Creek Street due to the difference in elevation of the existing ground and the Riparian Corridor of approximately six to ten feet.
4. Erosion still would have occurred inside and outside areas of archaeological strata from the drainage from the Bluffs outside the three drainage structures.
5. This option would have resulted in increased sediment deposition, ponding within the Riparian Corridor and increased frequency of maintenance to reestablish the flowline.

F. Option 4:

This option is indicated on Exhibit 7. The option would have kept the Bluff Creek Drive alignment in relatively the same location with a shift north to avoid the archaeological areas as in Options 1 and 2. The Riparian Corridor would then have been routed underneath the roadway alignments which would have been constructed as bridge sections. Drainage would have been routed to flow north of Bluff Creek Drive. A relatively short length of drainage box structure would have still been required at the west end under Dawn Creek Street.

Due to the realignment of the Riparian Corridor north, the length of the Riparian Corridor would have increased. As in Option 3, this lengthening would have required the Riparian Corridor to have a shallower slope to meet the existing flowline elevations at each end. This would have required the Riparian Corridor to be widened or deepened (or both) in order to carry the same amount of flow. This would have been a less efficient design resulting in an increase in sediment deposition and ponding compared to the Proposed Project's Riparian Corridor, and increased frequency of maintenance to reestablish the flowline gradient to convey the drainage. Reestablishing the flowline could have entailed having construction equipment (such as bulldozers or backhoes) placed into the Riparian Corridor to dredge the bottom.

As in Options 2 and 3, drainage from the Bluffs outside the three drainage structures from storm events would have flowed into the archaeological areas. This uncontrolled drainage would have caused erosion and ponding. In the dirt areas, this would have caused degradation of the surface and transport of soils. In the paved areas, the drainage

would eventually degrade the pavement ultimately washing it out. This would again have resulted in erosion of the underlying soils. It is anticipated that gullies would have formed before equilibrium for the flows would have been reached. This erosion could have impacted the archaeological resources due to their shallow depth. The ponding would also have resulted in vector control problems. This uncontrolled flow would have been inefficient hydraulically.

a) Advantages Compared to the Project:

1. This option would have required less grading and disturbance in the archaeological areas than the Proposed Project.

b) Disadvantages Compared to the Project:

1. Due to ponding and additional erosion, from a hydraulic standpoint this option would have been less efficient than the Proposed Project for dry weather flows and any storm event.
2. Semi-permanent ponding would have occurred in the undisturbed areas causing maintenance and vector control issues.
3. Additional structural protection (i.e. concrete, rip-rap, etc.) would have been required at the portion of the Riparian Corridor south of Dawn Creek Street due to the difference in elevation of the existing ground and the Riparian Corridor of approximately six to ten feet.
4. Erosion still would have occurred inside and outside areas of archaeological strata from the drainage from the Bluffs outside the three drainage structures.
5. This option would have resulted in increased sediment deposition, ponding within the Riparian Corridor and increased frequency of maintenance to reestablish the flowline.

G. Other Options

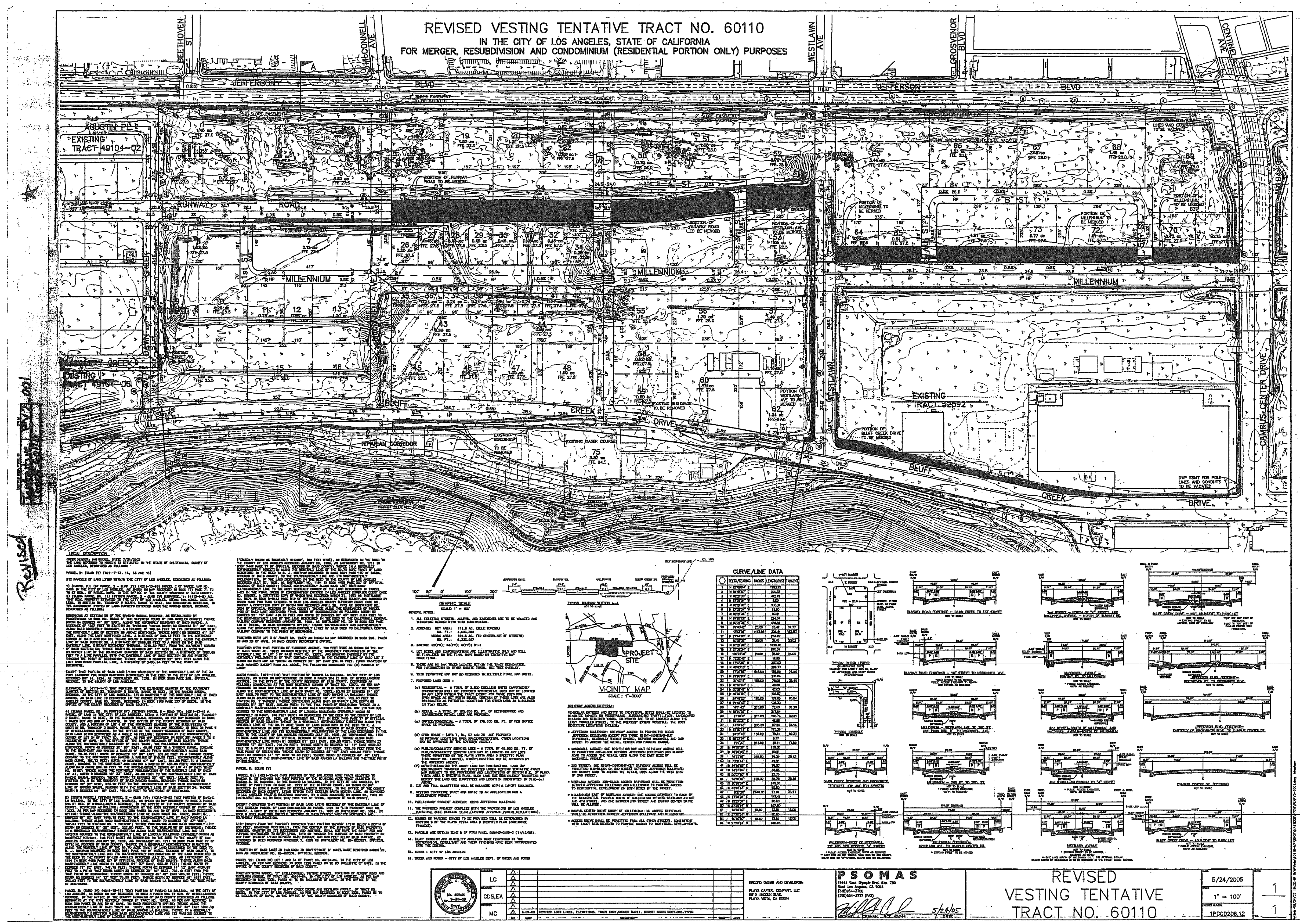
Other options were reviewed for viability and advantage to preserve in place the archaeological areas. Two examples are shown on Exhibits 8 and 9. Routing the Riparian Corridor to the south of the archaeological areas, as shown on Exhibit 8, would not have been feasible due to the steep terrain and the requirement to cross the property line. In addition, the NOS could not have been relocated without other potentially significant environmental and physical impacts, including excavation within archaeological areas. Exhibit 9 indicates an evaluation to raise the elevation of the Riparian Corridor above the archaeological strata. The Riparian Corridor could have been raised somewhat by starting with a shallower slope at the east end (the minimum slope to maintain flows within the cross-section of the Riparian Corridor). This would have resulted in a variable reduction in the amount of "cut" into the archaeological areas from approximately half a

foot to 3.8 feet. Since this would have still been from four to eight feet below the existing ground elevation throughout the archaeological areas, this option would not have had any advantage since archaeological strata are located in this soil depth.

V. SUMMARY

The Riparian Corridor as designed is the most efficient hydraulic system except for a concrete channel or pipe. Of all the options reviewed, Option 1 would not have been feasible from a hydraulic standpoint. Option 2, while viable from an engineering hydraulic standpoint, would have been less efficient in the hydraulic conveyance of storm flows at any level of runoff for the flows from the Bluffs, and would have been undesirable from a maintenance and vector control standpoint. Options 3 and 4, while viable from an engineering hydraulic standpoint, would have been less efficient in the hydraulic conveyance of flows at any level of runoff for the flows from the Bluffs, and would have been undesirable from a maintenance and vector control standpoint. In addition, Options 3 and 4 would have required more frequent periodic maintenance resulting in more frequent dredging and habitat disturbance. Options 2, 3, and 4 would have required some level of drainage work within the archaeological area, and under all four options, erosion likely could have impacted the archaeological areas.

EXHIBITS



PLAYA CAPITAL COMPANY, LLC

Exhibit 1
Riparian Corridor Study

PSOMAS

DATE: 11-14-2007 REVISED ON:
JOB No:1PCC0701.24

SHEET 1 OF 1

PV2-0093

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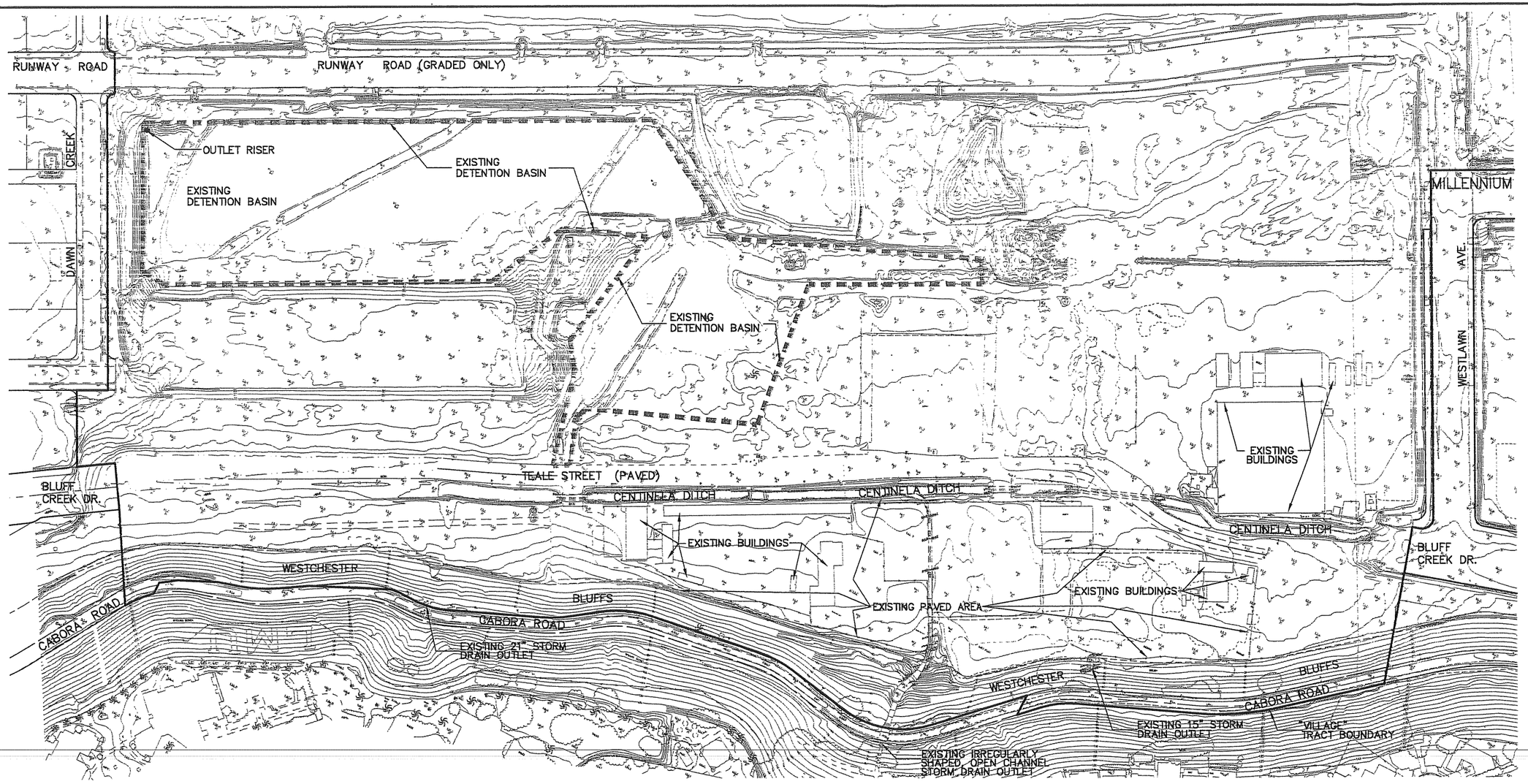

TOPO FLIGHT – 2002

Exhibit 2
Riparian Corridor Study
Existing Conditions and Constraints

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

PLAYA CAPITAL COMPANY, LLC

PSOMAS

DATE: 11-14-2007 REVISED ON:
JOB No:1PCC0701.24

SHEET 1 OF 1
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LEGEND

CFS FLOW RATE IN CUBIC FEET PER SECOND FOR 50-YEAR EVENT

STORM DRAIN STRUCTURE

TOPO FLIGHT – 2002

Exhibit 3
Riparian Corridor Study
Existing Drainage

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

PLAYA CAPITAL COMPANY, LLC

PSOMAS

DATE: 11-14-2007 REVISED ON:
JOB No:1PCC0701.24

SHEET 1 OF 1
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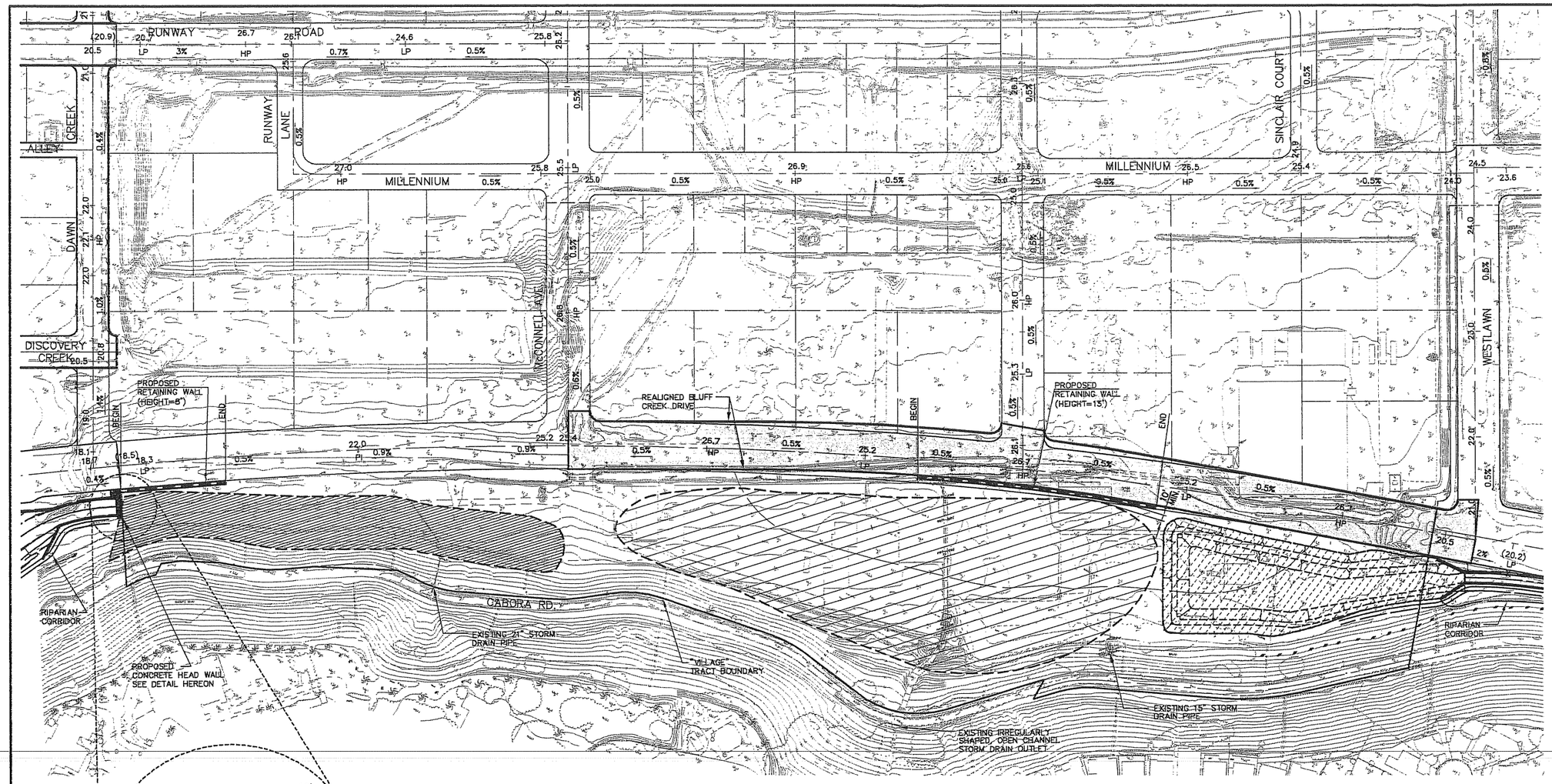

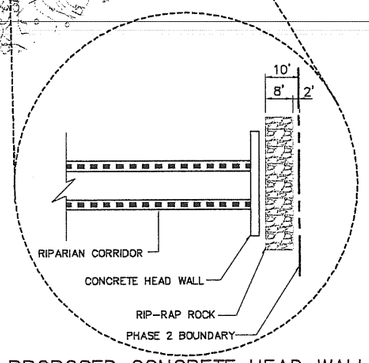

PROPOSED CONCRETE HEAD WALL

LEGEND

- ARCHEOLOGICAL ZONE LAN-62
- ARCHEOLOGICAL ZONE LAN-211-H (RECOVERY PLAN)
- PROPOSED REALIGNED BLUFF CREEK DRIVE
- DETENTION BASIN

NOTES:

1. No grading South of Bluff Creek Drive in Phase 2 boundary except detention construction East of archeological zone.

2. The Bluff storm drains overflow to the proposed grade on top of the archeological zones.

TOPO FLIGHT - 2002

Exhibit 4
Riparian Corridor Study
No Riparian Corridor
Option 1

PLAYA CAPITAL COMPANY, LLC

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

PSOMAS

DATE: 10-30-07 REVISED ON: 11-14-07
JOB No:1PCC0701.24

SHEET 1 OF 3
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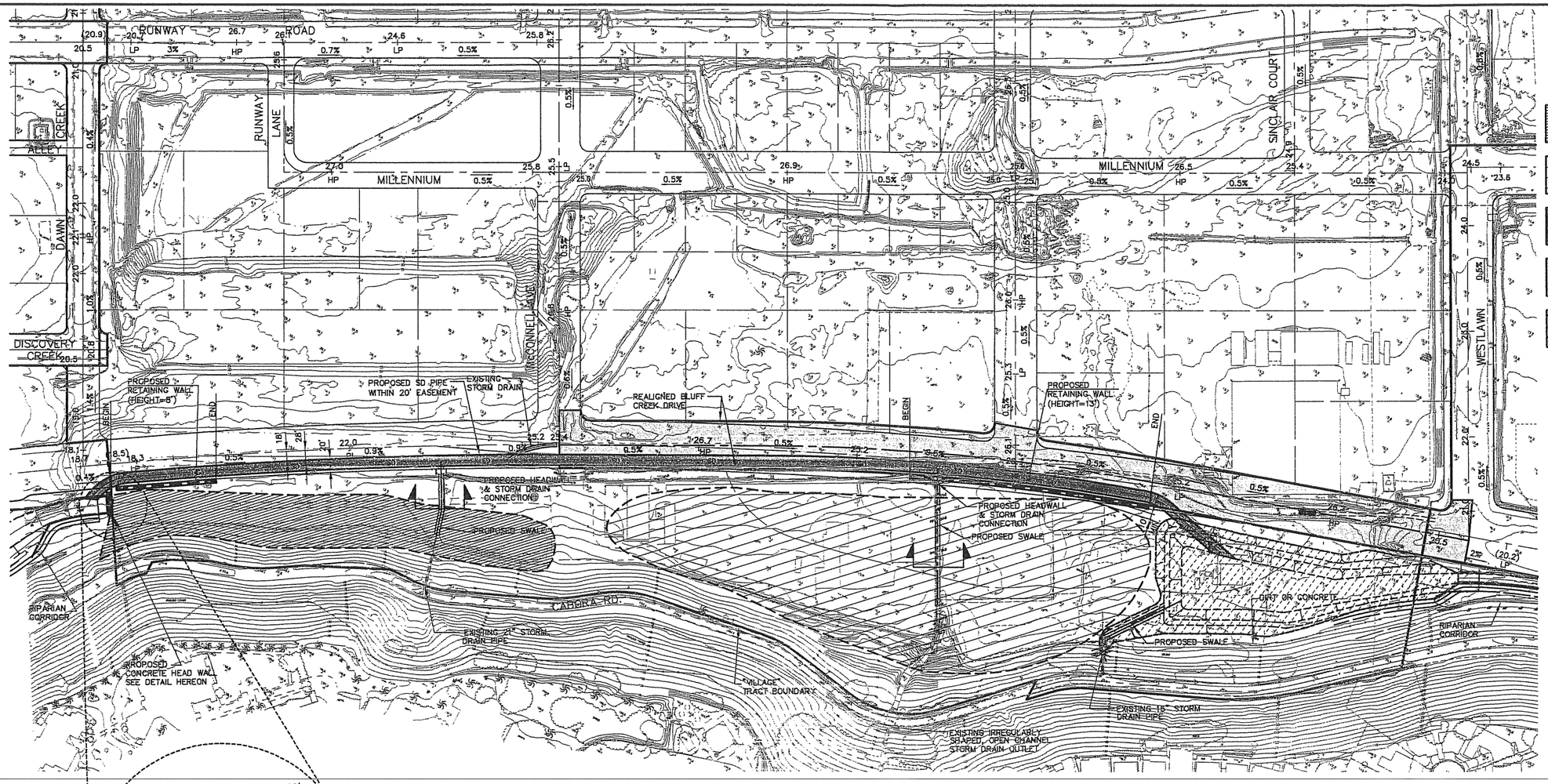
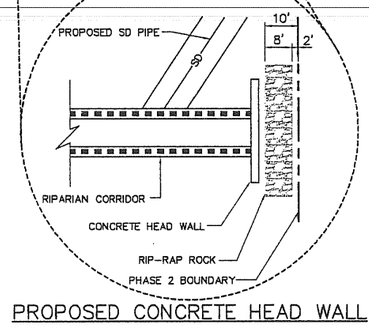
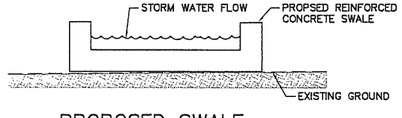


LEGEND

- ARCHEOLOGICAL ZONE LAN-62
- ARCHEOLOGICAL ZONE LAN-211-H (RECOVERY PLAN)
- PROPOSED REALIGNED RIPARIAN IN PIPE
- PROPOSED REALIGNED BLUFF CREEK DRIVE
- DETENTION BASIN



PROPOSED CONCRETE HEAD WALL
NTS



PROPOSED SWALE
NTS

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

NOTES:

1. No grading South of Bluff Creek Drive in Phase 2 boundary except detention construction East of archeological zone.

2. The Bluff storm drains shall have connections to the storm drain pipe along Bluff Creek Drive.

TOPO FLIGHT – 2002

Exhibit 5
Riparian Corridor Study
No Riparian Corridor with Storm Drain Pipe Option 2

PSOMAS

DATE: 10-30-07 REVISED ON: 11-14-07
JOB No: 1PCC0701.24

SHEET 1 OF 3
PV2-0085-01

PLAYA CAPITAL COMPANY, LLC

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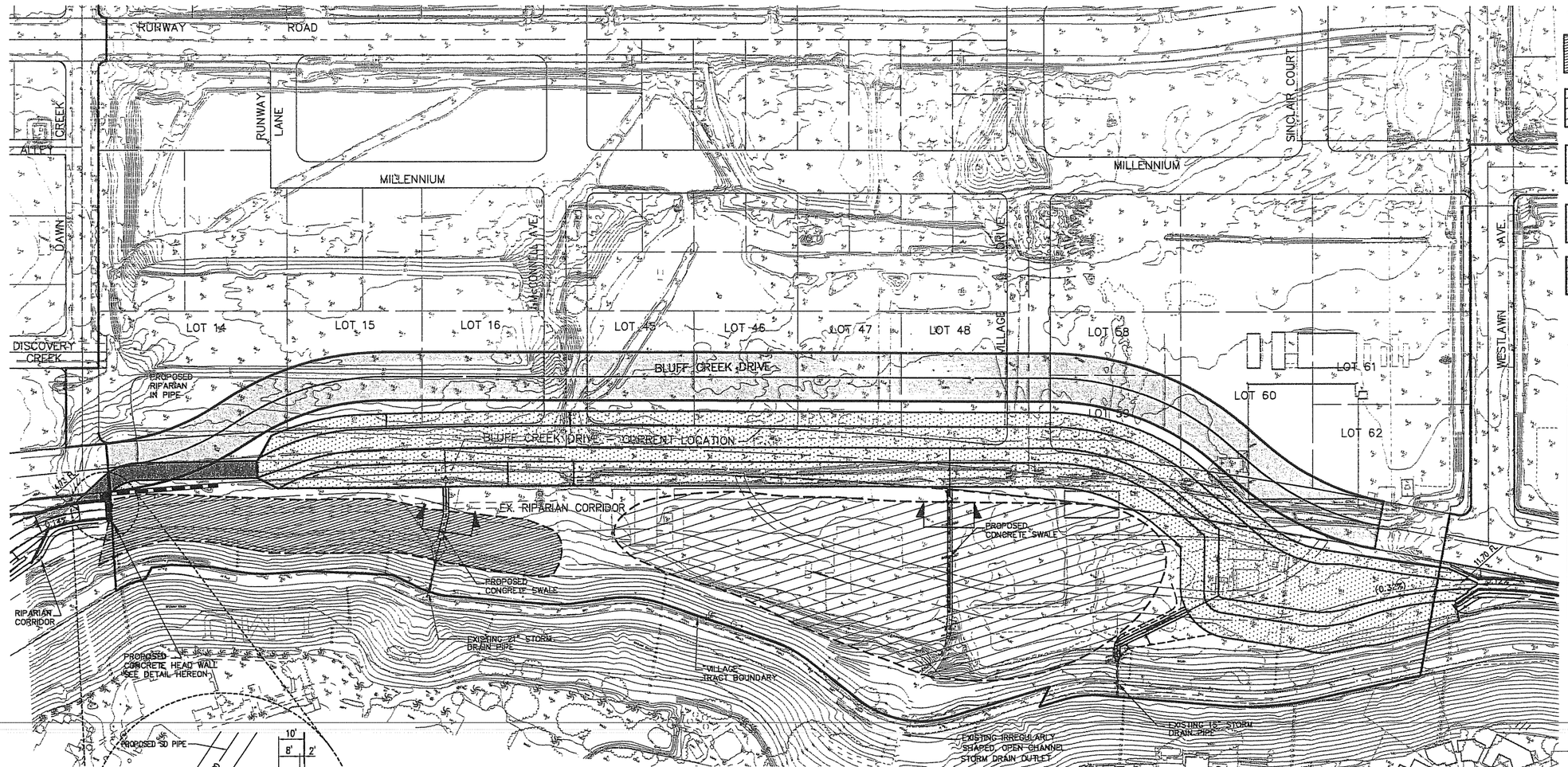
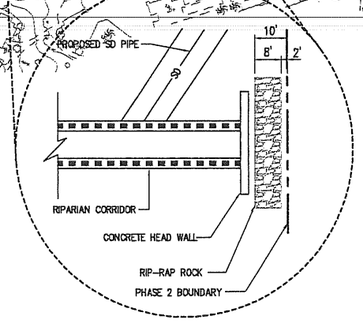


LEGEND

- ARCHEOLOGICAL ZONE LAN-62
- ARCHEOLOGICAL ZONE LAN-211-H (RECOVERY PLAN)
- REALIGNED RIPARIAN CORRIDOR
- REALIGNED BLUFF CREEK DRIVE
- PROPOSED REALIGNED RIPARIAN IN PIPE

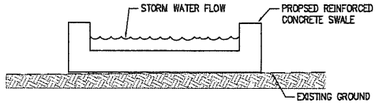
TABLE 1 – IMPACTED AREAS (SF)

LOT NO.	ORIGINAL	IMPACTED
14	81,817	15,117
15	54,600	33,444
16	47,856	30,457
45	41,794	26,581
46	41,673	26,878
47	43,472	28,637
48	47,584	32,243
58	28,386	551
59	36,977	36,754
60	75,668	22,493
62	53,920	960
TOTAL	553,747	254,115



PROPOSED CONCRETE HEAD WALL
NTS

RIPARIAN AREAS	DESIGN EXISTING (SF)	ALIGNMENT PROPOSED (SF)
RIPARIAN BOTTOM	109,600	109,900
RIPARIAN SLOPES	103,800	119,000
TOTALS	213,400	228,900



PROPOSED SWALE
NTS

NOTES:

1. Bluff Creek Drive and the Riparian corridor are realigned north of the existing alignment as shown in the exhibit.
2. The realignment impacts the lots 14,15,16,45,46,47,48,58,60 and 62.
3. Table 1 summarizes the impacted areas per lot number
4. The realigned corridor does not impact any of the archeological zones.
5. The discharge from existing bluff storm drains will be directed to the realigned corridor through concrete swales.

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

TOPO FLIGHT – 2002

Exhibit 6
Riparian Corridor Study
Realigned Riparian & Bluff Creek Dr to the North Option 3

PSOMAS

DATE: 10-30-07 REVISED ON:
JOB No:1PCC0701.24

SHEET 1 OF 3
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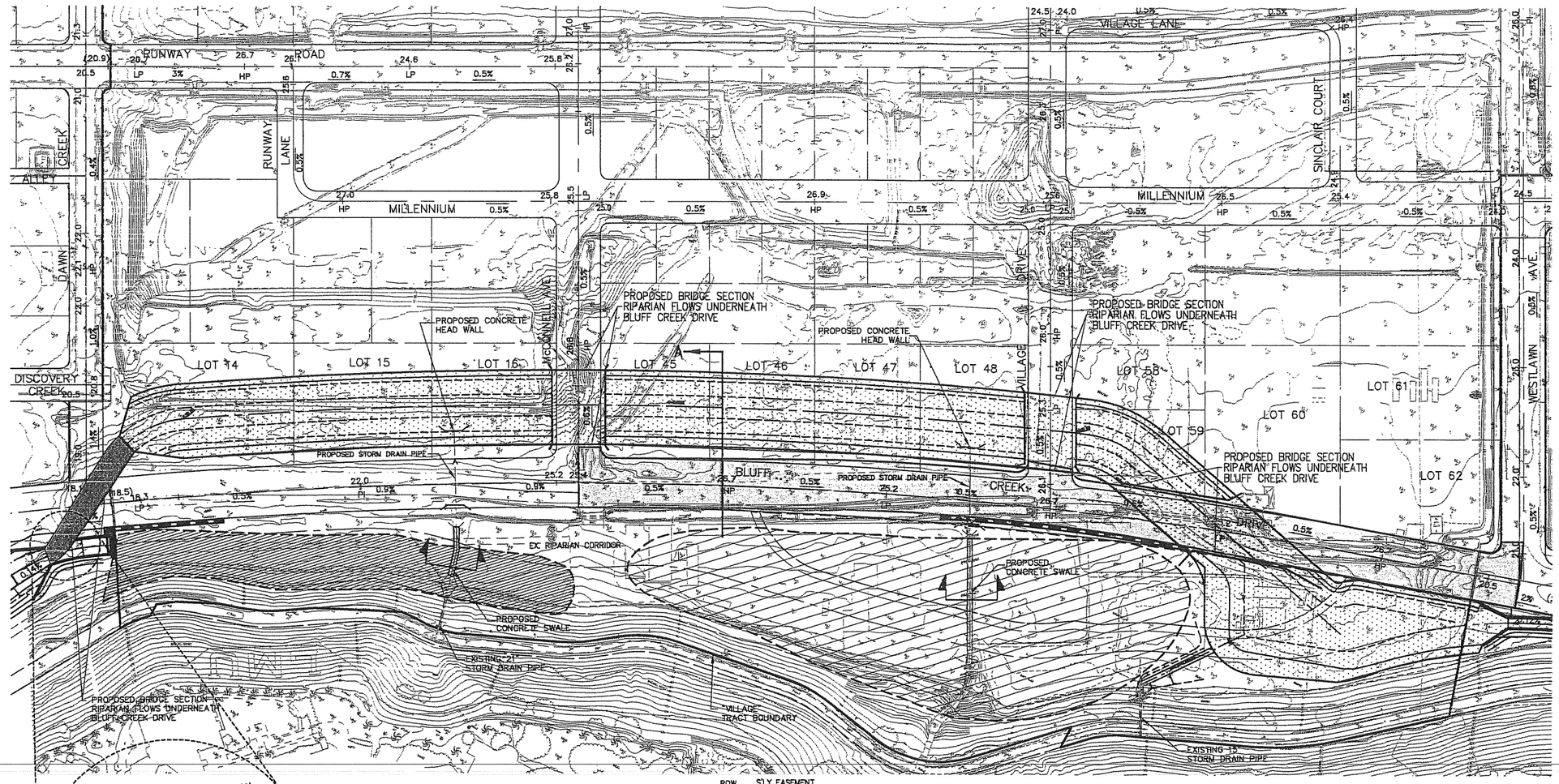

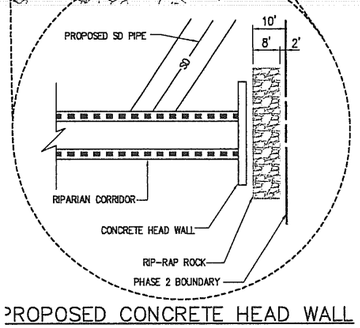

PROPOSED CONCRETE HEAD WALL
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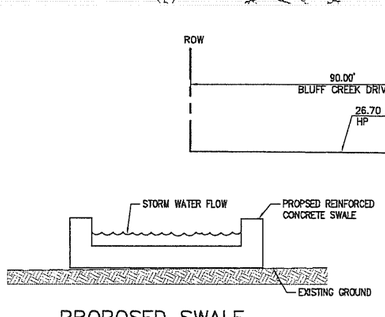
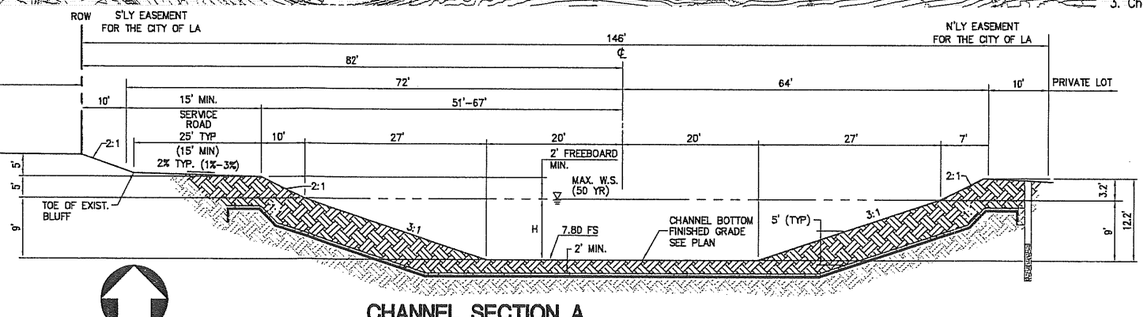


PROPOSED SWALE
NTS



CHANNEL SECTION A
NTS

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

LEGEND

- ARCHEOLOGICAL ZONE LAN-62
- ARCHEOLOGICAL ZONE LAN-211-H (RECOVERY PLAN)
- REALIGNED RIPARIAN CORRIDOR
- REALIGNED BLUFF CREEK DRIVE
- PROPOSED REALIGNED RIPARIAN IN PIPE

TABLE 1 - IMPACTED AREAS (SF)

LOT NO.	ORIGINAL	IMPACTED
14	81,817	56,534
15	54,600	40,517
16	47,856	36,534
45	41,794	31,822
46	41,673	30,957
47	43,472	30,994
48	47,584	31,908
58	28,386	1,889
59	36,977	22,702
60	75,814	2,653
TOTAL	629,561	286,510

REALIGNMENT NOTES:

1. Bluff Creek Drive remains in its current location.

2. The Riparian corridor is realigned north of the existing Bluff Creek Drive as shown in the exhibit.

REALIGNMENT IMPACTS:

1. The realigned corridor does not impact the archeogolical zones LAN-62 and LAN-211-H

2. The realignment impacts the lots 14, 15, 16, 45, 46, 47, 48, 58 and 59. Table 1 summarizes the impacted areas.

3. Changes to lot configuration are required.

TOPO FLIGHT - 2002

Exhibit 7
Riparian Corridor
Alignment Study
Option 4

PSOMAS

DATE: 10-30-2007 REVISED ON:
JOB No:1PCC070124

SHEET 1 OF 3
PV2-0088-01

PLAYA CAPITAL COMPANY, LLC

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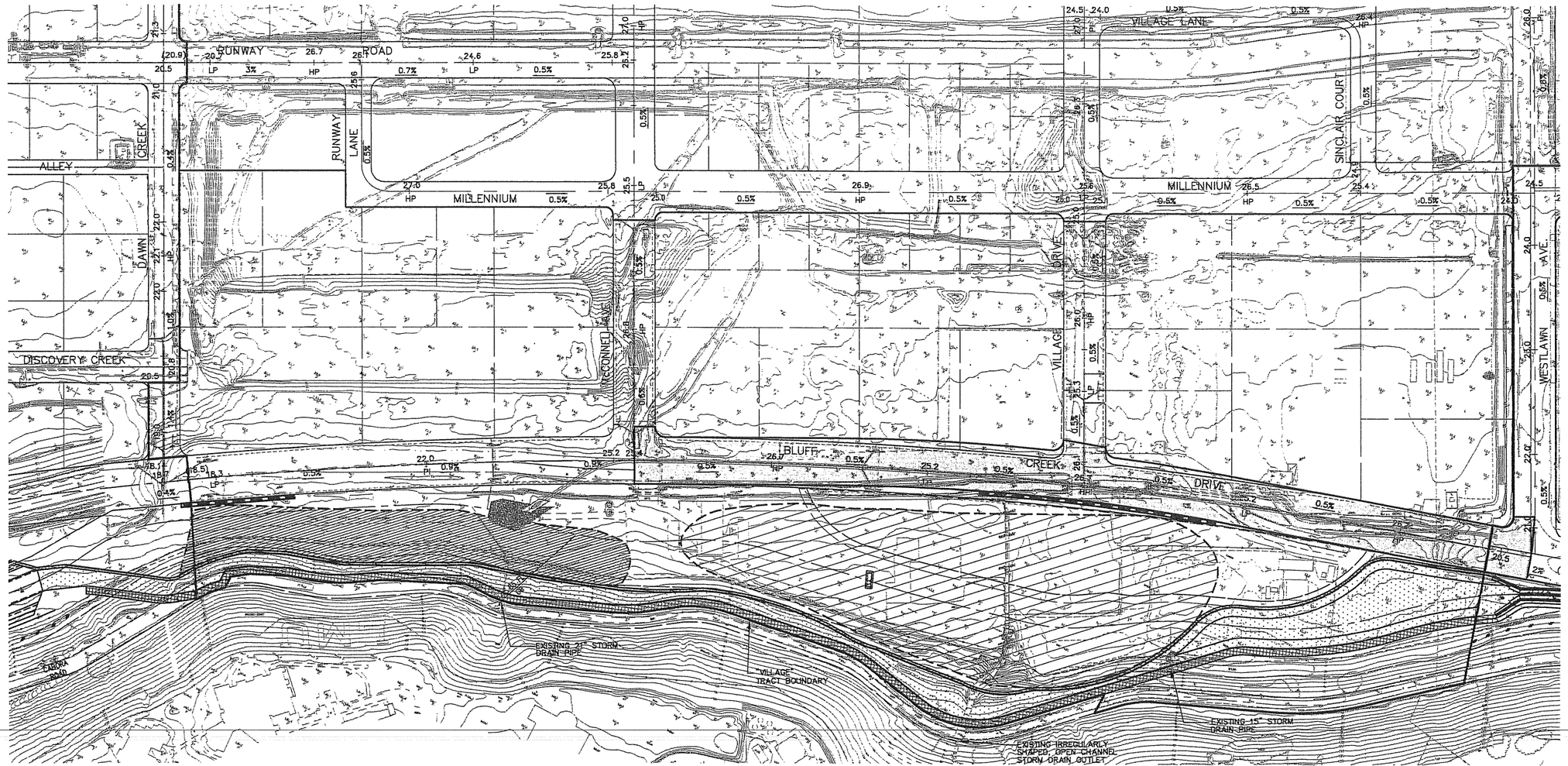

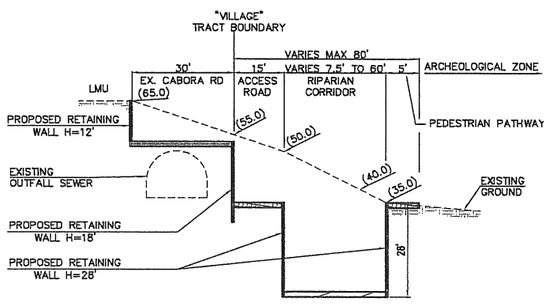

LEGEND

- ARCHEOLOGICAL ZONE LAN-62
- ARCHEOLOGICAL ZONE LAN-211-H (RECOVERY PLAN)
- RIPARIAN CORRIDOR
- ACCESS ROAD/TRAIL
- PROPOSED REALIGNED BLUFF CREEK DRIVE

ALIGNMENT NOTES:

1. Bluff Creek Drive remains in its current location.
2. The riparian corridor gets relocated south of the archeological zone, and it is forced only to happen within the plahse 2 boundary.

REALIGNMENT IMPACTS:

1. Requires large and tall retaining walls.

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

TOPO FLIGHT – 2002

Exhibit 8
Riparian Corridor
Realignment within Phase 2
Option 5

PSOMAS

DATE: 10-30-2007 REVISED ON: .
JOB No:.

SHEET 1 OF 3
PV2-0089-01

PLAYA CAPITAL COMPANY, LLC

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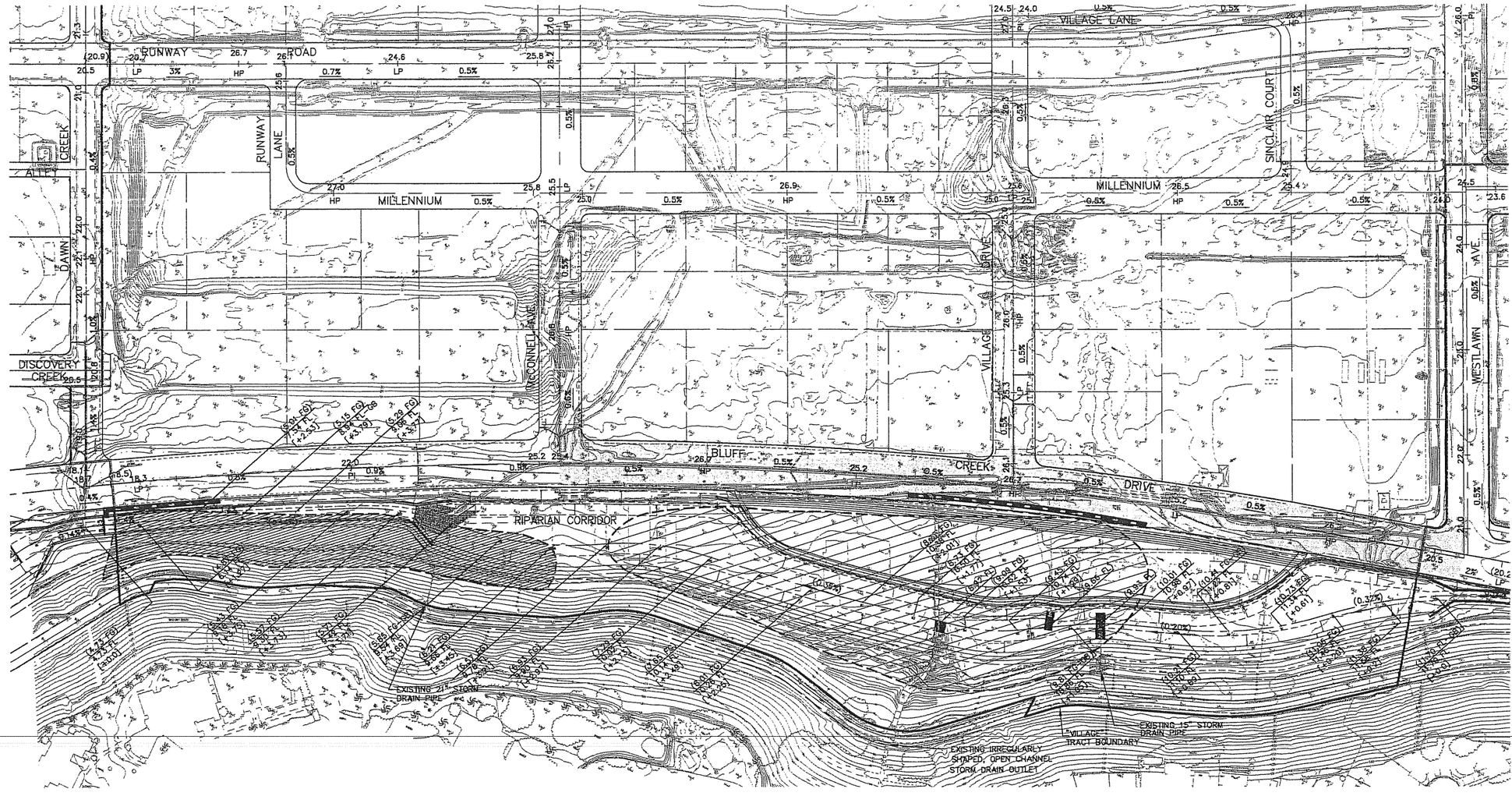
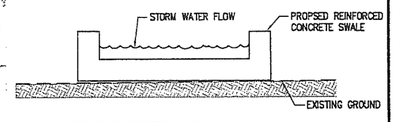


LEGEND

- ARCHEOLOGICAL ZONE LAN–62
- ARCHEOLOGICAL ZONE LAN–211–H (RECOVERY PLAN)
- PROPOSED REALIGNED BLUFF CREEK DRIVE



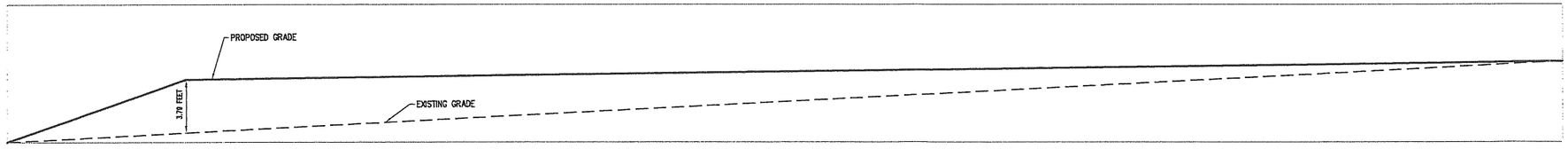
PROPOSED SWALE
NTS

ALIGNMENT NOTES:

1. Bluff Creek Drive and the Riparian corridor remain in their current location.
2. A shallow riparian corridor.

REALIGNMENT IMPACTS:

1. The proposed study still impacts the archeogolical zones LAN–62 and LAN–211.
2. It may discontinue wild life habitat.
3. It creates a wider corridor thus decreasing the park acreage.



SECTION ALONG CENTERLINE OF RIPARIAN CORRIDOR

TOPO FLIGHT – 2002

Exhibit 9
Riparian Corridor
Alignment Study
Option 6

PSOMAS

DATE: 10–30–07 REVISED ON: .
JOB No:1PCC070124

SHEET 1 OF 3
PV2–0090–01

PLAYA CAPITAL COMPANY, LLC

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

Plotted: 11/14/07 10:02:23 W:\PVista\60110-MP\ENGR\EXHIBIT\PV2-0090-01.dwg ebramanld

APPENDICES

Village at Playa Vista

Historic Permits

1. 500,000 cubic yard stockpile
2. 125,000 cubic yard stockpile
3. 1,000,000+ cubic yard stockpile
4. 9,500 cubic yard stockpile
5. 300,000 cubic yard stockpile
6. Erosion Control Basin C
7. Erosion Control Basin E
8. Erosion Control Plans

0303-10002-01227 (1) PVE14

City of Los Angeles - Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing

READ BY	FILE NO.

DISTRIBUTION

☐ Owner ☐ ..... Pl Ck.
☐ Petitioner ☐ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 12707 W. Teale Street

LOT(S) Lot 3 Rancho Medrano 3AB BLK

TRACT Rancho Ballona 4211-013-043

Owner Playa Capital LLC

Address 5670 Wilshire Blvd Suite #1100

Los Angeles CA Zip 90036

1 Daytime Phone (310) 822-9074

Petitioner Thomas Longyear

Address 11444 W. Olympic Blvd #750

Los Angeles CA Zip 90064

Daytime Phone (310) 584-3591 (Moe)

District Office W. L.A. Type
Plan Ck No. Stories
Zone C2-1(PV) M1(PV) Occ
Permit No 03030-10000 No. Units
Job Order No. 10227 F.D.
Bureau/Division B.S. / Zoning D.M. 162B161
Use of Bldg. C.D. 11
Job Status STOCK PILE

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Time Extentions For the Existing Stock Piles (500,000 + 2,500 C.Y.) With Original Permit 03030-10000-01227 C.Y.
See Exhibit "A" For total 500,000 C.Y. + 2,500 C.Y. and 03030-10000-01227

Dept. Comment Extension of time for Stockpile

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

The Existing Stock Piles will be Used For Current and Future Grading works Within Playa Vista Projects in Phase I and Phase II.

Petitioner's Signature ..... Position For Petitioner Date 1/19/05

Reviewed By CKumabe Date 3/1/05

DEPARTMENT ACTION: In accordance with ☐ Sec. 98.0403 L.A.M.C. ☐ Sec. 17951dH. & S.C. ☐ Sec. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter) ☐ Denied (See reverse for appeal information)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved. CKumabe

☐ Condition (DOES) (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION) ..... CKumabe 3/1/05

Department Action by Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

The time extension shall be given 1/27/05 thru 1/27/06

Supplemental permit shall be issued to reflect the time period.

Carry Over TO (Cashier Use Only)

LA Department of Building and Safety
LA 06 24 068592 03/01/05 04:34PM

BOARD APPLIC FEE	$100.00
Total Due:	$100.00
	$100.00

No. Of Items 1
Fee Due $100.00
Fee Verified ... CKumabe

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, Statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) - Bd. Res. 832

X ..... Position ..... Date .....

Print Name .....

LADBS-Req.Mod.37 (4/2003)

www.ladbs.org

12707 W Teale St

Permit #: 03030 - 10002 - 01227
Plan Check #: Printed: 03/01/05 04:23 PM
Event Code:

Grading
Commercial
'an Check at Counter
ɔ Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 03/01/2005

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevatio
Airport Hazard Area - 200' Height Limit Above Elevatio
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.01
District Map - 102B161
Environmentally Sensitive Area - YES
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES
Near Source Zone Distance - 6.9
Thomas Brothers Map Grid - 672-E7

ZONE(S): C2(PV) /M(PV) /

4. DOCUMENTS

ZI - ZI-1320
ZI - ZI-1874
ZA - ZA-2000-1242-YV
ZA - ZA-2000-5255-YV
SPA - Los Angeles Coastal Transportatic
SPA - Playa Vista (Area D)
PKLY - PKG-LAYOUT-161
ORD - ORD-160523
DTRM - DIR-2000-3257
DTRM - DIR-2000-5369
CPC - CPC-1985-272-PA
CPC - CPC-1991-522-GPA-ZC
CPC - CPC-1991-523-HD
CPC - CPC-1999-2507-PAD-PV
CPC - CPC-1999-3186-PAD-PV
CPC - CPC-1999-500-PAD-PV

5. CHECKLIST ITEMS

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Capital Llt 12555 Jefferson Blvd. 300 LOS ANGELES CA 90066

Tenant:
Applicant: (Relationship: Agent for Owner)
Moe Lahooti - Psomas 11444 W Olympic Blvd. 750 LOS ANGELES CA 90064 (310) 564-2500

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
EXTEND TIME FOR STOCKPILE OF 502,500 CUBIC YARDS APPROVED UNDER 03030-10000-01227 (500,000 CYDS.) AND 03030-10001-01227 (2,500 CYDS.) FROM 1/27/05 THRU 1/27/06. THE STORM WATER PLAN SHALL BE MAINTAINED IN AN APPROVED STATUS BY PUBLIC WORKS THRUOUT THIS PERIOD.

9. # Bldgs on Site & Use: STOCKPILE

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By: DAS PC By:
OK for Cashier: Colin Kumabe Coord. OK:
Signature: Date:

For Cashier's Use Only W/O #: 33001227

Project: PLAYA VISTA

LA Department of Building and Safety
LA 06 24 068593 03/01/05 04:38PM

MAJOR PROJECTS REVIEW	$174.
GRADING PERMIT	$0.
ONE STOP SURCH	$3.
SYSTEMS DEVT FEE	$10.
CITY PLANNING SURCH	$5.
MISCELLANEOUS	$5.
Subtotal:	$198
Carry Over FROM Tran# 068593	$100
Total Due:	$298
Check:	$298

05LA 71008

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period
Permit Valuation: 50 cu yd PC Valuation:

FINAL TOTAL Grading	198.14
Permit Fee Subtotal Grading	160.00
O.S. Surcharge	3.48
Sys. Surcharge	10.44
Planning Surcharge	5.22
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	14.00

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS
Plot Plan

*P030301000201227FY

13. STRUCTURE INVENTORY (Note: Numeric measurement data in the format "number / number" implies "change in numeric value / total resulting numeric value")

03030 - 10002 - 01227

14. APPLICATION COMMENTS

Request for a Modification, file no. 10632 was approved by Mr. David Hsu, dated 5/9/03 .Okay to issue grading permit.

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless, the information printed exceeds that required by Section 19825 of the Health and Safety Code of the State of California.

15. Building Relocated From:

16. CONTRACTOR, ARCHITECT, & ENGINEER NAME	ADDRESS	CLASS	LICENSE#	PHONE #
(O) , Owner-Builder	, ,		0	

PERMIT EXPIRATION

This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by the Dept. of Building & Safety (Sec. 22.12 & 22.13 LAMC).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code
Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):

(__) I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

OR

(__) I, as the owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractors License Law.)

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

(__) I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

(__) I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier:_____ Policy Number:_____

(__) I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS ($100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION / LEAD HAZARD WARNING

I certify that notification of asbestos removal is either not applicable or was sent to the AQMD or EPA as per section 19827.5 of the Health and Safety Code. Due to the possible presence of lead-based paint, lead safe work practices are required on all repairs in pre-1979 buildings that disturb paint. Failure to do so could create lead hazards that violate California Health and Safety Code Section 17920.10 and Section 105256 and may be subject to a $1000 fine or criminal prosecution. For more information call LA County's Department of Health Services at (800)524-5323. In order t locate a Lead Certified Professional and obtain additional information, call California DHS at (800)597-5323 or go to the DHS Website at http://www.dhs.ca.gov/childlead/html/GENclist.html.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably re with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC):

By signing below, I certify that:

(1) I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration / Lead Hazard Warning and Final Declaration; and

(2) This permit is being obtained with the consent of the legal owner of the property.

Print Name:_____ Sign:_____ Date:_____ ☐ Owner ☐ Authorized Agent

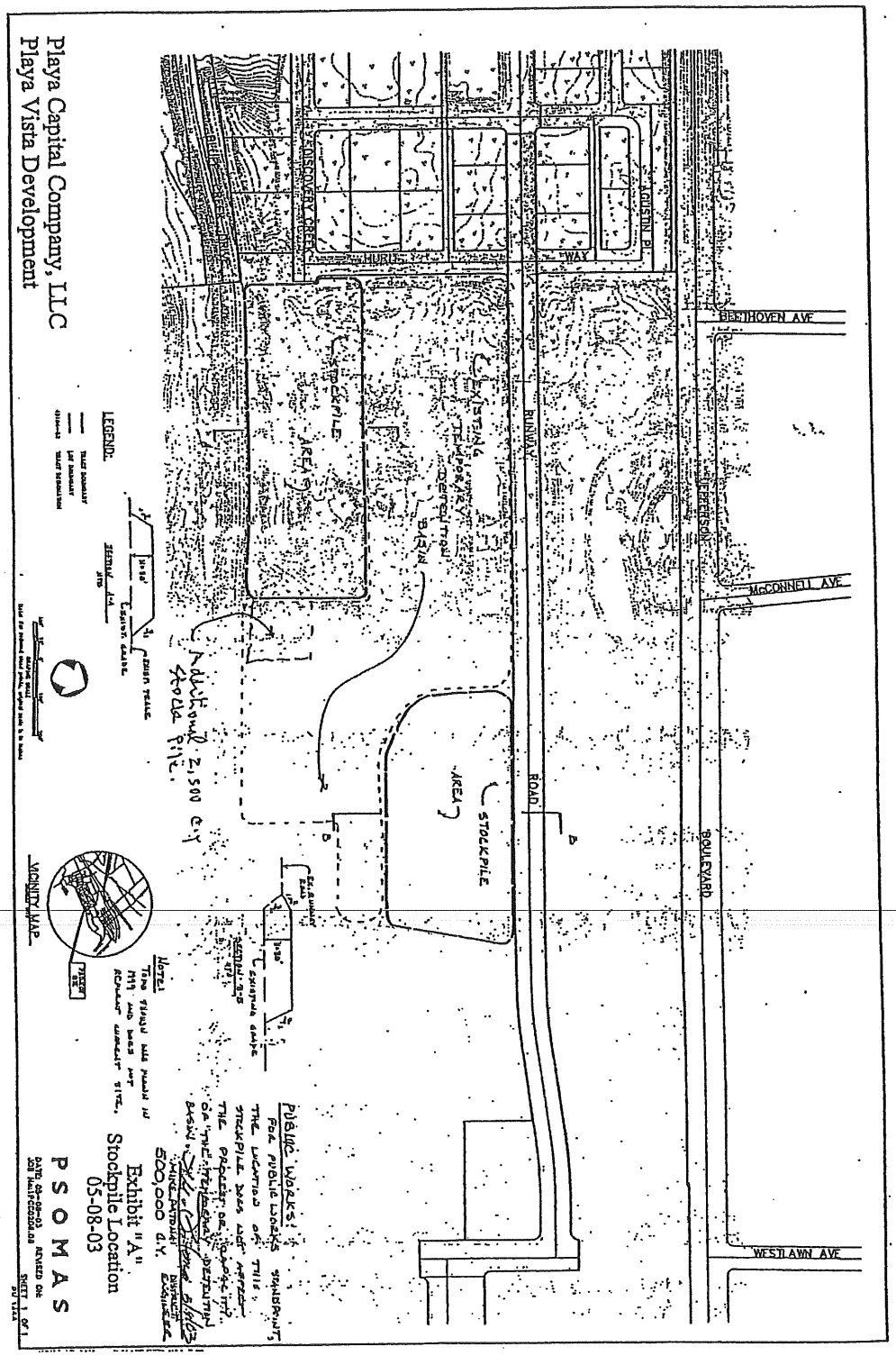
Grading
Commercial
No Plan Check

City of Los Angeles - Department of Building and Safety

PLOT PLAN ATTACHMENT

Plan Check #:
Initiating Office: METRO
Printed on: 03/01/05 16:02:31

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



12707 W Teale St

Permit #: 03030 - 10000 - 01227

Plan Check #:

Printed: 05/09/03 03:56 PM

Event Code:

Grading
mmercial
Check at Counter
bmit Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue

Status Date: 05/09/2003

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevatio
Airport Hazard Area - 200' Height Limit Above Elevatio
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.010
District Map - 102B161
Environmentally Sensitive Area - YES
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES
Near Source Zone Distance - 6.9
Thomas Brothers Map Grid - 672-E7

ZONE(S): C2(PV)/M(PV)/

4. DOCUMENTS

ZI - ZI-1320
ZI - ZI-1874
ZA - ZA-2000-1242-YV
ZA - ZA-2000-5255-YV
SPA - Los Angeles Coastal Transportatic
SPA - Playa Vista (Area D)
PKLY - PKG-LAYOUT-161
ORD - ORD-160523
DTRM - DIR-2000-3257
DTRM - DIR-2000-5369
CPC - CPC-1985-272-PA
CPC - CPC-1991-522-GPA-ZC
CPC - CPC-1991-523-HD
CPC - CPC-1999-2507-PAD-PV
CPC - CPC-1999-3186-PAD-PV
CPC - CPC-1999-500-PAD-PV

5. CHECKLIST ITEMS

LA Department of Buildins and Safety
LA 05 27 083406 05/09/03 04:48PM

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Capital Llt — 12555 Jefferson Blvd. 300 — LOS ANGELES CA 90066

Tenant:

Applicant: (Relationship: Agent for Owner)
Moe Lahooti - Psomas — 11444 W Olympic Blvd. 750 — LOS ANGELES CA 90064 — (310) 564-2500

PLAN & LAND USE	$150.0
ONE STOP SURCH	$347.5
SYSTEMS DEVT FEE	$1,042.5
CITY PLANNING SURCH	$521.2
MISCELLANEOUS	$5.0
Total Due:	$2,066.2
Check:	~~$1,899.7~~
Check:	$166.5

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
500,000 cubic yard stockpile with expanded ground area authorized. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510.

9. # Bldgs on Site & Use:

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Fred Wong
OK for Cashier: Fred Wong
DAS PC By:
Coord. OK:
Signature:
Date: 5/9/03

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 33001227

Project: PLAYA VISTA

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 500,000 cu yd
PC Valuation:

FINAL TOTAL Grading	19,291.25
Permit Fee Subtotal Grading	17,225.00
Additional Plan Check	150.00
O.S. Surcharge	347.50
Sys. Surcharge	1,042.50
Planning Surcharge	521.25
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID:
Total Bond(s) Due:

LA Department of Buildins and Safety
LA 05 27 083405 05/09/03 04:45PM

GRADING PERMIT	$17,225.0
Total Due:	$17,225.0
No Fee:	$17,225.0

NO FEE NO FEE NO FEE
Name: PLAYA VISTA CAPITAL
Addr: 12707 W TEALE ST
Auth: PLAYA VISTA WAIVER
Dept: PLAYA VISTA

03LA 42399

12. ATTACHMENTS

Plot Plan

13. STRUCTURE INVENTORY

03030 - 10000 - 01227

(P) Fill 500,000 cuyd

14. APPLICATION COMMENTS

Request for a Modification, file no. 10632 was approved by Mr. David Hsu, dated 5/9/03 .Okay to issue grading permit.

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless, the information printed exceeds that required by Section 19825 of the Health and Safety Code of the State of California.

15. Building Relocated From:

16. CONTRACTOR, ARCHITECT, & ENGINEER NAME	ADDRESS	CLASS	LICENSE#	PHONE #
(O) , Owner-Builder	, ,		0	

PERMIT EXPIRATION

This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by the Dept. of Building & Safety (Sec. 22.12 & 22.13 LAMC).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code: Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):

(_) I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

OR

(_) I, as the owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractors License Law.)

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

(_) I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

(_) I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier:_____ Policy Number:_____

(_) I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS ($100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION

I certify that notification of asbestos removal is either not applicable or was sent to the AQMD or EPA as per section 19827.5 of the Health and Safety Code.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

(1) I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration and Final Declaration; and

(2) This permit is being obtained with the consent of the legal owner of the property.

Print Name: R Moe Lahooti Ko-Playa Capital Sign: R [signature] Date: 5/9/03 ☐ Owner ☒ Authorized Agent

1207 W Teale St

Permit Application #: 03030 - 10000 - 01227

Grading
Commercial
No Submit Plan Check

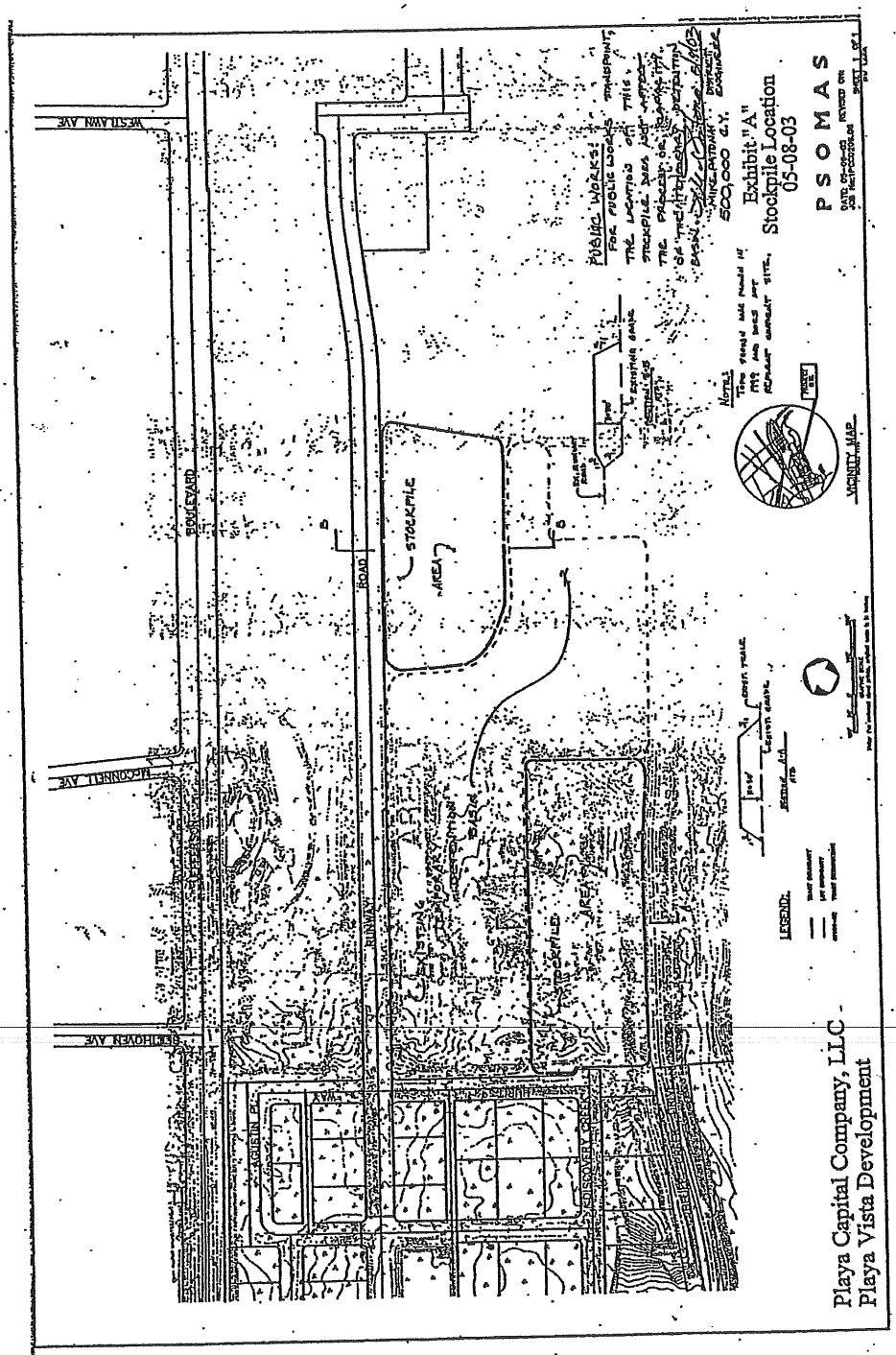
City of Los Angeles - Department of Building and Safety

Plan Check #:
Initiating Office: METRO

PLOT PLAN ATTACHMENT

Printed on: 05/09/03 10:18:00

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



COUNCIL DISTRICT: 11

PLOT PLAN ATTACHMENT

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

[illegible] above requests, complete sections 1, 2, & 3 in duplicate by printing [illegible]nk or typing.

READ BY

FILE NO. 10632

PAGE 1 OF 5

DISTRIBUTION

☐ Owner ☑ ..... Pl Ck.
☑ Petitioner ☑ W.LA ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 12707 W. Teale Street

LOT(S) SEE OVER BLK

TRACT

1

Owner Playa Capital Company, LLC
Address 12555 Jefferson Blvd #300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
Los Angeles, CA Zip 90064
Daytime Phone (310) 954-3745

District Office W.LA
Plan Ck No.
Zone C2(PV)/M(PV)
Permit No. 03030-10000-01227
Job Order No.
Bureau/Division B.S./Grading
Use of Bldg. Stockpile
Job Status

Type
Stories
Occ.
No. Units
F. D.
D. M.
C. D. 11

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

PER THE ATTACHED LETTER DATED MAY 6, 2003 AND THE ATTACHED EXHIBIT "A", IT IS REQUESTED TO MODIFY THE CONFIGURATION OF, AND ANTICIPATED USE OF, THE 500,000 CY TEMPORARY STOCKPILE PREVIOUSLY APPROVED PER MODIFICATION 8543, AND APPROVED EXTENTIONS OF TIME BY MODIFICATIONS 9446 AND 10416.

Dept. Comment TEMPORARY STOCK PILE

Code Sections: L.A.M.C.— 91.7011.3

Title 24—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

See attached Psomas letter dated May 6, 2003

Petitioner's Signature [signature] Position For Psomas Mrs. Lahorty Date 5/9/2003

Reviewed By [signature] Date 5/9/03

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] 5/9/03

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

SEE ATTACHED CONDITIONS OF APPROVAL, LETTER BY PSOMAS, AND EXHIBIT "A"

Date

LA Department of Building and Safety
LA 03 28 083668 05/09/03 11:36AM

MAJOR PROJECTS REVIEW	$100.00
Total Due:	$100.00
Carry Over TO Tran# 083669:	$100.00

(Cashier Use Only)

No. of Items 1
Fee due $100
Fee verified [illegible]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

1. This approval is only for a 500,000 CY stockpile located as shown on drawing titled "Exhibit A Stockpile Location 05/08/03" of the Psomas report dated May 6, 2003. This approval expires 05/10/2004.

2. A grading permit shall be obtained.

3. Obtain approval from the soils engineer for any import from hauling source to the site. The imported soils are free of contamination.

4. The stockpile shall not exceed 30 feet in height and be steeper that 2:1 (horizontal to vertical).

5. Adequate temporary erosion control devices acceptable to the Building Department, and to the Department of Public Works, shall be provided and maintained during the rainy season.

6. Prior to any site development a detailed soil report shall be provided to the Department for a review and approval.

PSOMAS

Information and Engineering Solutions

FILE # 1068C
PAGE 3 OF 5

May 6, 2003

Mr. David Hsu
Department of Building and Safety
Grading Division – 3rd Floor, Counter I
201 Figueroa Street
Los Angeles, CA 90012

Subject: Playa Vista – 500,000 Cubic Yard Stockpile Permit

Dear Mr. Hsu

At your direction, Playa Vista has prepared the enclosed application for a grading permit specifically for the temporary stockpile of up to 500,000 cubic yards approved by your department in Modification 8543, issued on January 16, 2001, and extended by Modifications 9446 and 10416. As we have discussed, Playa Vista believes it has all necessary grading permits for this stockpile as the material in this stockpile is from Tracts 49104-01, 49104-04, 49104-05, 49104-06, 49104 and 52092, which have their own grading permits. Nevertheless, as you have requested, Playa Vista encloses an application for a grading permit specifically for this stockpile. The material for this stockpile has been, and will continue to be, imported from off-site sources, and from permitted on-site Tract grading operations for Tracts 49104-01, 49104-04, 49104-05, 49104-06, 49104, and 52092. This stockpiled material will continue to be required for completion of portions of these tracts, and for other grading operations within the project. This material will continue to be placed in the D-2 area south of Runway Road as shown on Exhibit "A." Please see this exhibit for the project address.

Per your request, Playa Vista understands that these permits are for stockpile purposes only, and compaction reports will not be required. No separate grading operations will be conducted under the permit other than the stockpiling activities. And, Playa Vista is specifically restricted from grading below the groundwater elevation without a separate permit.

Per your request, this letter is sealed by both the Civil Engineer and Geotechnical Engineer. This indicates we understand your specific requirement that, while settlement may occur, it will not be monitored. Therefore, no settlement "credit" will be requested under this Modification.

11444 West Olympic Blvd.
Suite 750
West Los Angeles, CA 90064-1549

310.954.3700
310.954.3777 Fax
www.psomas.com

Per your request, Exhibit "A" with cross sections and notes has been prepared and is included with this submittal. This exhibit indicates the location of this temporary stockpile and its intended use.

If you have any questions please do not hesitate to call me.

Sincerely,

PSOMAS

Michael J. Crehan, P.E.
Vice President

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. CREHAN
No. C48944
Exp. 9-30-04
CIVIL
STATE OF CALIFORNIA

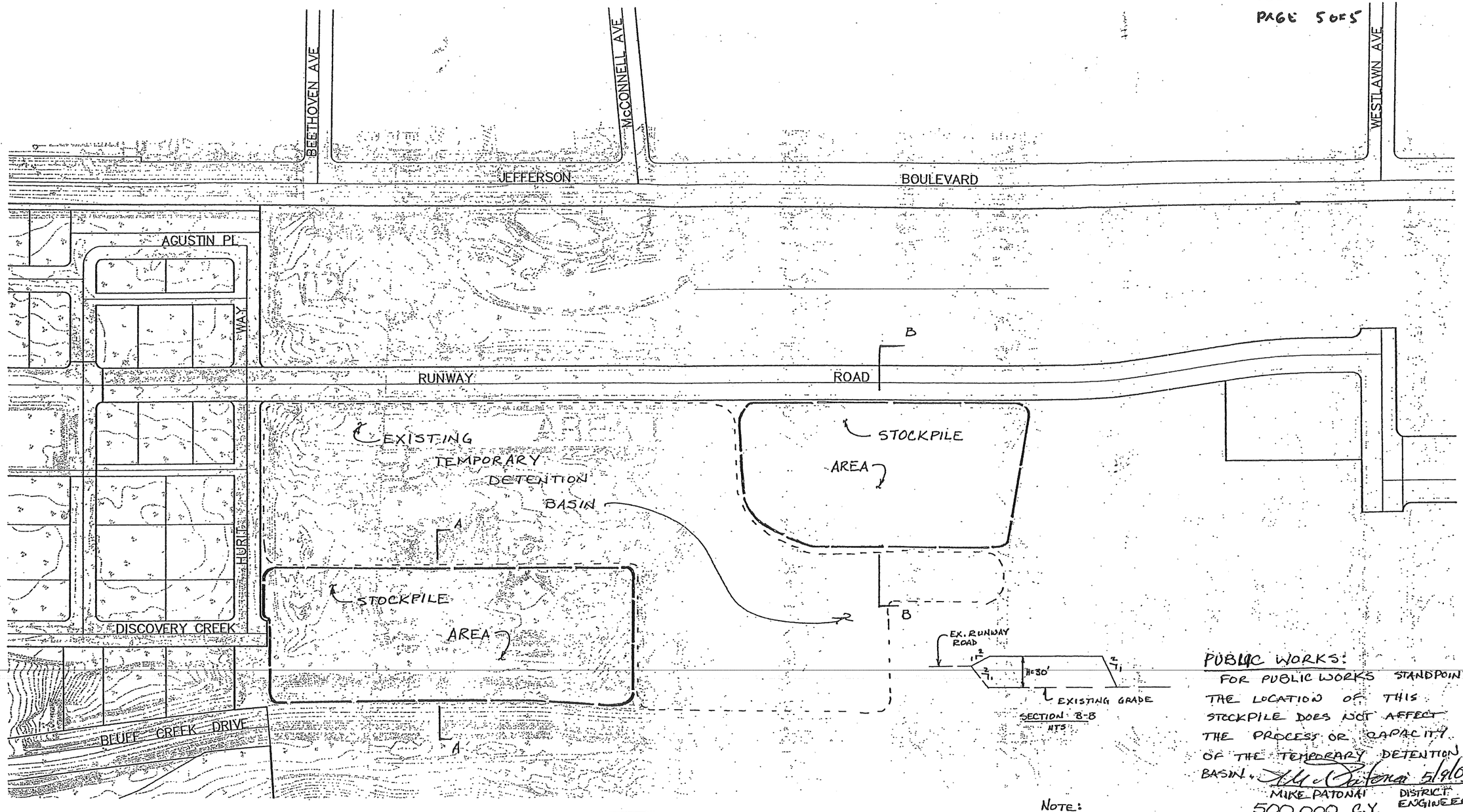
Group Delta Consultants has reviewed this letter for geotechnical conformance only.
For Group Delta Consultants

REGISTERED PROFESSIONAL ENGINEER
MICHAEL DAVID READER
No. GE 2259
Exp. 3-31-05
GEOTECHNICAL
STATE OF CALIFORNIA
5-6-03

Michael D. Reader, GE 2259
Vice President

cc: Bruce Harrigan, Cliff Ritz – Playa Vista
Mike Kremer, Leticia Cardoso - Psomas

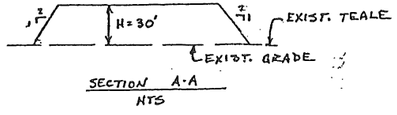
FILE # 10632
PAGE 5 OF 5



SECTION B-B
NTS

PUBLIC WORKS:
FOR PUBLIC WORKS STANDPOINT, THE LOCATION OF THIS STOCKPILE DOES NOT AFFECT THE PROCESS OR CAPACITY OF THE TEMPORARY DETENTION BASIN. 5/9/03
MIKE PATONAI DISTRICT ENGINEER

500,000 C.Y.

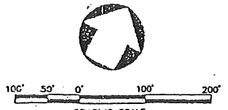


SECTION A-A
NTS

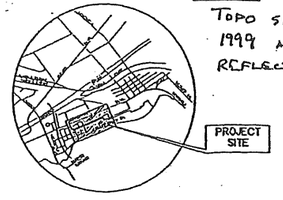
NOTE:
TOPO SHOWN WAS FLOWN IN 1999 AND DOES NOT REFLECT CURRENT SITE.

LEGEND:

———	TRACT BOUNDARY
———	LOT BOUNDARY
49104–02	TRACT DESIGNATION



GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches



VICINITY MAP
SCALE: NTS

Exhibit "A"
Stockpile Location
05-08-03

Playa Capital Company, LLC
Playa Vista Development

PSOMAS

DATE: 05-08-03 REVISED ON:
JOB No:1PCC0206.08

SHEET 1 OF 1
PV 1466

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 10416

DISTRIBUTION

☒ Owner ☒ ..... Pl Ck.
☒ Petitioner ☒ ..... Insp.
☐ Fire ☒ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 1250½ Teal Street

LOT(S) 2 & 3 BLK
TRACT 12672

Owner Playa Capital Company, LLC
Address 12555 Jefferson Blvd #300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

1

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
Los Angeles, CA Zip 90064
Daytime Phone (310) 954-3745 "Moe"

District Office W.L.A. Type .....
Plan Ck No. ..... Stories .....
Zone ..... Occ. .....
Permit No. ..... No. Units .....
Job Order No. ..... F.D. .....
Bureau/Division Grading D.M. .....
Use of Bldg. ..... C.D. 6
Job Status Under Construction - Stock Pile

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To Allow An Extension Of Time For the Existing Approved Modification # 9446 regarding 500,000 C.Y Temporary Stock Pile (Dirt) for Current & Future Grading Work, until 2,1,04

Dept. Comment Extension Of Time.

Code Sections: L.A.M.C.— 98.0602
Title 24— 98.0605

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading Work is in Progress and 500,000 CY Dirt is necessary to Provide the required Dirt for Grading work. For More Detail information See Psomas Letter dated 1,27,03. (Attached.)

Petitioner's Signature [signature] Position Psomas Date 1,28,03 For: Moe Lahooti

Reviewed By [signature] Date 2/4/03

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☐ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

2/4/03

Department Action By [signature] Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This approval is for 500,000 CY stockpile. Located as shown on Exhibit "A" attached. No Grading activities except stock piling are allowed.
2. Stock pile activities shall be restricted from areas subject to Current or future methane testing and/or mitigation on measures.
3. This approval expires 1,16,04

LA Department of Building and Safety
LA 03 26 076245 01/29/03 09:43AM
BOARD APPLIC FEE $100.00
Total Due: $100.00
No Fee: $100.00
(Cashier Use Only)
NO FEE NO FEE NO FEE
Name: PLAYA VISTA CAPITAL
Addr: 1330 1/2 TEAL
Auth: PLAYA VISTA
Dept: PLAYA VISTA
No. of Items 1
Fee due $100.00
Fee verified ..... ml

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

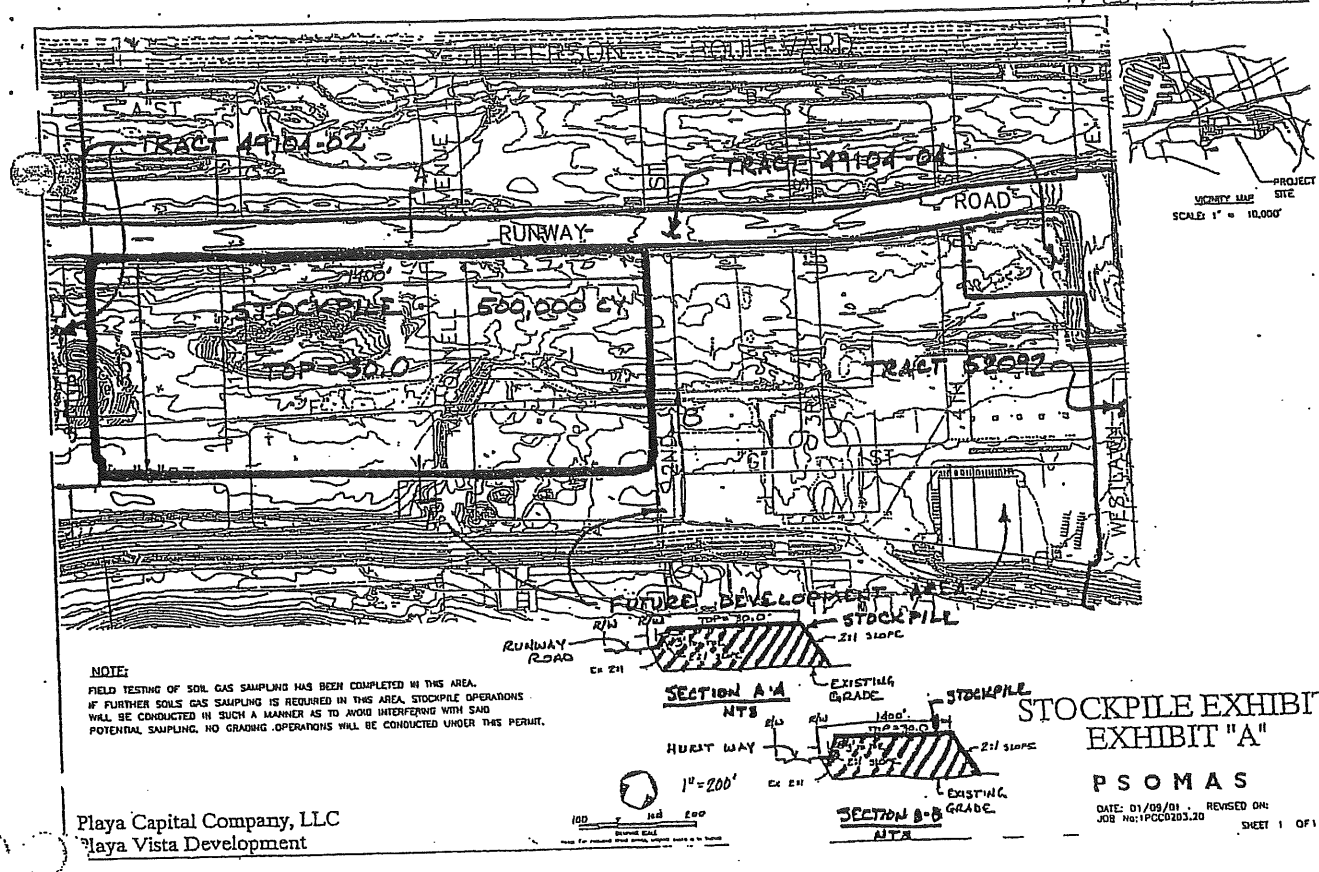
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

P1 E5, E14, E19



NOTE:
FIELD TESTING OF SOIL GAS SAMPLING HAS BEEN COMPLETED IN THIS AREA.
IF FURTHER SOILS GAS SAMPLING IS REQUIRED IN THIS AREA, STOCKPILE OPERATIONS WILL BE CONDUCTED IN SUCH A MANNER AS TO AVOID INTERFERING WITH SAID POTENTIAL SAMPLING. NO GRADING OPERATIONS WILL BE CONDUCTED UNDER THIS PERMIT.

Playa Capital Company, LLC
Playa Vista Development

STOCKPILE EXHIBIT
EXHIBIT "A"

PSOMAS

DATE: 01/09/01 REVISED ON:
JOB No:1PCC0203.20

SHEET 1 OF 1

PSOMAS

Information and Engineering Solutions

January 27, 2003

Mr. David Hsu
Department of Building and Safety
Grading Division – 3rd Floor, Counter I
201 Figueroa Street
Los Angeles, CA 90012

Subject: Playa Vista - Stockpile Permit Extension Request
1250 ½ Teale Street

Dear Mr. Hsu

We are requesting that a modification be issued to allow the extension of the temporary stockpile located as shown on the attached exhibit. The original stockpile request was for 500,000 c.y. located south of Runway Road, north of Teale Street, and east of the easterly boundaries of Tracts 49104-02 and 49104-06. The original request was presented because Playa Vista had the opportunity to obtain imported material from off-site sources for the future completion of the grading of Tracts 49104-01, 49104-02, 49104-04, 49104-05, 52092, and 49104-06 and 49104 (Split approximately a year ago from previous Tract 49104). Playa Vista still has this stockpile need as the grading of Tracts 49104-04, 49104-06, 49104, and 52092 are still not complete. The stockpile is currently in place and we are using it at this time for these permitted grading operations. Also attached for you reference are the original modification for the stockpile (#8543) and the modification for a previous time extension (#9446).

Per your request, Playa Vista understands that these permits are for stockpile purposes only. No grading operations will be conducted under the permits. Per your request, this specifically restricts grading below the groundwater elevation.

Per your request, Exhibit "A" with cross sections and notes has been prepared and is included with this submittal. This exhibit indicates the location of these temporary stockpiles and their intended use.

If you have any questions please do not hesitate to call me.

Sincerely,
Psomas

Michael J. Crehan, P.E.
Senior Project Manager

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. CREHAN
No. C48944
Exp. 9-30-04
CIVIL
STATE OF CALIFORNIA

Copy: Bruce Harrigan, Tim Connors, Cliff Ritz – Playa Vista
Leticia Cordoso - Psomas

11444 West Olympic Blvd.
Suite 750
West Los Angeles, CA 90064-1549

310.954.3700
310.954.3777 Fax
www.psomas.com

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 9446

DISTRIBUTION

☒ Owner	☒		Pl Ck.
☒ Petitioner	☒		Insp.
☐ Fire	☒		Bur.
☐ Health	☐		

JOB ADDRESS 12508 Teale Street

LOT(S) 2 and 3 BLK

TRACT 12672

Owner Playa Capital Company, LLC

Address 12555 Jefferson Blvd. #300

Los Angeles, CA Zip 90066

Daytime Phone (310) 822-0074

Petitioner Psomas

Address 11444 W. Olympic Blvd. #750

Los Angeles, CA Zip 90064

Daytime Phone (310) 954-5700 310 954 3777 Fax

District Office WLA Type

Plan Ck No. Stories

Zone Occ.

Permit No. No. Units

Job Order No. F.D.

Bureau/Division Grading D.M.

Use of Bldg. C.D. 6

Job Status Undir. Construction—Stockpile

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER

☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER

☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To grant an extension of existing Modification #8543 to allow 500,000 cy temporary stock pile (dirt) for future grading work as needed for grading preparations to complete Tracts 49104-02, 49104-02, 49104-04, and 52002, as well as Tracts 49104-05 and 49104. Extension of time is requested until 1/16/03.

Dept. Comment Extension of Time

Code Sections: L.A.M.C.— 98.0602

Title 24— 98.0605

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

The 500,000 cy dirt is necessary to provide the required dirt for future grading work.

Petitioner's Signature [signature] Position Psomas Date 1/24/02

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied~~ (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature]

Department of Building and Safety LA.03.16.055578.01/2[illegible]/02 04:26PM Date 2/1/2

BOARD APPLIC FEE $100.0

Total Due: $100.0

No Fee: $100.0

FEE NO FEE NO FEE

PLAYA VISTA

12508 TEALE STREET

WAIVED FEE LETTER (Cashier Use Only)

CITY PLANNING

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This approval is for 500,000 CY Stockpile located as shown on "Exhibit A" attached. No grading activities except stockpiling are allowed.
2. Stockpile activities shall be restricted from areas subject to current or future methane testing and/or mitigation measures.
3. This approval expires 1/16/03

Plan Check Fee Paid

Grading Fee Paid

Auth

Dept

No. of Items 1

Fee due 100

Fee verified [illegible]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 9446

DISTRIBUTION

☒ Owner ☒ ..... Pl Ck.
☒ Petitioner ☒ ..... Insp.
☐ Fire ☒ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 12508 Teale Street

LOT(S) 2 and 3 BLK

TRACT 12672

Owner Playa Capital Company, LLC
Address 12555 Jefferson Blvd. #300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

1

Petitioner Psomas
Address 11444 W. Olympic Blvd. #750
Los Angeles, CA Zip 90064
Daytime Phone (310) 954-3700
310 | 954 3777 fax

District Office WLA
Plan Ck No.
Zone
Permit No.
Job Order No.
Bureau/Division Grading
Use of Bldg.
Job Status Under Construction - Stockpile
Type
Stories
Occ.
No. Units
F. D.
D. M.
C. D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To grant an extension of existing Modification #8543 to allow 500,000 CY temporary stock pile (dirt) for future grading work as needed for grading operations to complete Tracts 49104-02, 49104-02, 4904-04, and 52092, as well as Tracts 49104-05 and 49104. Extension of time is requested until 1/16/03.

Dept. Comment Extension of Time

Code Sections: L.A.M.C.— 98.0602

Title 24— 98.0605

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

The 500,000 CY dirt is necessary to provide the required dirt for future grading work.

Petitioner's Signature [signature] Position Psomas Date 1/24/02

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~(NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... Edw. Cabrera
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

2/1/2

LA Department of Building and Safety
LA.03.16.055578.01/24/02 04:26PM
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This approval is for 500,000 CY Stockpile located as shown on "Exhibit A" attached. No grading activities except stockpiling are allowed.
2. Stockpile activities shall be restricted from areas subject to current or future methane testing and/or mitigation measures.
3. This approval expires 1/16/3

BOARD APPLIC FEE $100.0
Total Due: $100.0
No Fee: $100.0
FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 12508 TEALE STREET
Auth: WAIVED FEE LETTER PL
Dept: CITY PLANNING
(Cashier Use Only)

No. of Items 1
Fee due 100
Fee verified [illegible]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-81 (R 1/88)

City of Los Angeles — Department of Building and Safety

☑ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO.: 8543

DISTRIBUTION

☑ Owner	☒ 2	Pl Ck.
☑ Petitioner	☒ W.L.A.	Insp.
☐ Fire	☐	Bur.
☐ Health	☐	

JOB ADDRESS: 12502 Teal Street

LOT(S): 2 and 3 BLK

TRACT: 12672

Owner: Playa Capital Company, LLC

Address: 1255 Corporate Blvd. #200

Los Angeles, CA Zip: 90660

1 Daytime Phone (310) 822-9074

Petitioner: Psomas

Address: 11444 W. Olympic Blvd. #750

Los Angeles, CA Zip: 90064

Daytime Phone (310) 954-3745

District Office: W.L.A. Type:
Plan Ck No. Stories:
Zone Occ.:
Permit No. No. Units:
Job Order No. F. D.:
Bureau/Division: Engineering D. M.:
Use of Bldg. C. D.: 6
Job Status: Stock Pile

☐ YARD NOTICE (COM-754) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To Allow 500,000 C.Y Temporary Stock Pile (Dirt) for future Grading work. See Attached Psomas letter dated January 9, 2001 and Exhibits.

Dept. Comment: TEMPORARY STOCKPILE

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Importing 500,000 Cy Dirt to provide the required dirt for future Grading work. See attached CDM's letter dated Nov 1, 2000.

Petitioner's Signature: [signature] Position: For Psomas Date: 1/10/2001

Reviewed By: Date:

DEPARTMENT ACTION: In accordance with ☒ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☑ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By: [signature] 01-16-2001 Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. THIS APPROVAL IS ONLY FOR A 500,000 CY STOCKPILE LOCATED AS SHOWN ON "EXHIBIT A" ATTACHED. NO GRADING ACTIVITIES EXCEPT STOCKPILING IS ALLOWED.
2. STOCKPILE ACTIVITIES SHALL BE RESTRICTED FROM ANY AREAS SUBJECT TO CURRENT OR FUTURE METHANE TESTING AND/OR MITIGATION MEASURES.
3. THIS APPROVAL EXPIRES 01-16-2002.

LA Department of Building and Safety
LA 02 15 028459 01/10/01 04:12PM
BOARD APPLIC FEE $100.00
Total Due: $100.00
(Cashier Use Only) $100.00

No. of Items: 1
Fee due: 100.00
Fee verified: [signature]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-852) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/98)

JAN -16-01 (TUE) 23:03 DEV. SERVICES TEL:213 9776428 P.002

PSOMAS

Information and Engineering Solutions

January 8, 2001

Mr. David Hsu
Department of Building and Safety
Grading Division – 3rd Floor, Counter I
201 Figueroa Street
Los Angeles, CA 90012

Subject: Playa Vista - Stockpile Permit Request

Dear Mr. Hsu:

We are requesting that a Modification be issued for a temporary stockpile permit for 500,000 cubic yards of imported material. Playa Vista has the immediate opportunity to obtain this imported material from off-site sources. Import is scheduled to commence within the next two weeks. This imported material will be placed in the "D-2" Area of Playa Vista, which is immediately east of tract 49104-02, and immediately south of Runway Road as shown on Exhibit "A". This material will be used ultimately as needed for the grading operations to complete Tracts 49104-01, 49104-02, 49104-04, and 52092 (all of which have current Building & Safety Mass Grading Permits), and to commence grading operations in Tracts 49104-05 and 49104-06 when permits are obtained for these Tracts.

Per your request, we have obtained a letter from CDM addressed to Playa Vista stating that field testing soil gas sampling has been completed in this area.

Per your request, Playa Vista understands that if further soils gas sampling is required in this area, stockpile operations will be conducted in such a manner as to avoid interfering with said potential sampling.

Per your request, Playa Vista understands that this Modification is for stockpile purposes only. No grading operations will be conducted under this permit. Per your request, this specifically restricts grading below the groundwater elevation.

Per your request, this letter is sealed by both the Civil Engineer and Geotechnical Engineer. This indicates we understand your specific requirement that, while settlement may occur, it will not be monitored. Therefore, no settlement "credit" will be requested under this Modification.

11444 West Olympic Blvd.
Suite 750
West Los Angeles, CA 90064-154
310.954.3700
310.954.3777 Fax
www.psomas.com

PSOMAS

Per your request, a new Exhibit "A" with additional cross sections and notes has been prepared and is included with this submittal. This exhibit indicates the location of this temporary stockpile and its intended use.

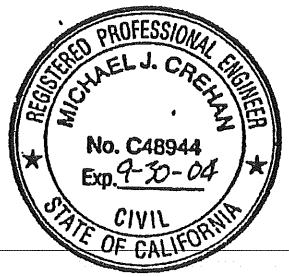
To summarize, this letter, the CDM letter, Exhibit "A", the Modification application, and the appropriate $100.00 fee are submitted at your request with the understanding that the Building & Safety requirements for this Modification issuance will now be satisfied. We ask that you please issue the Modification within a week to allow this importing operation to commence on schedule.

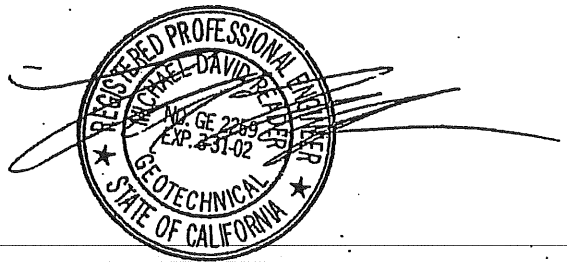
If you have any questions please do not hesitate to call me.

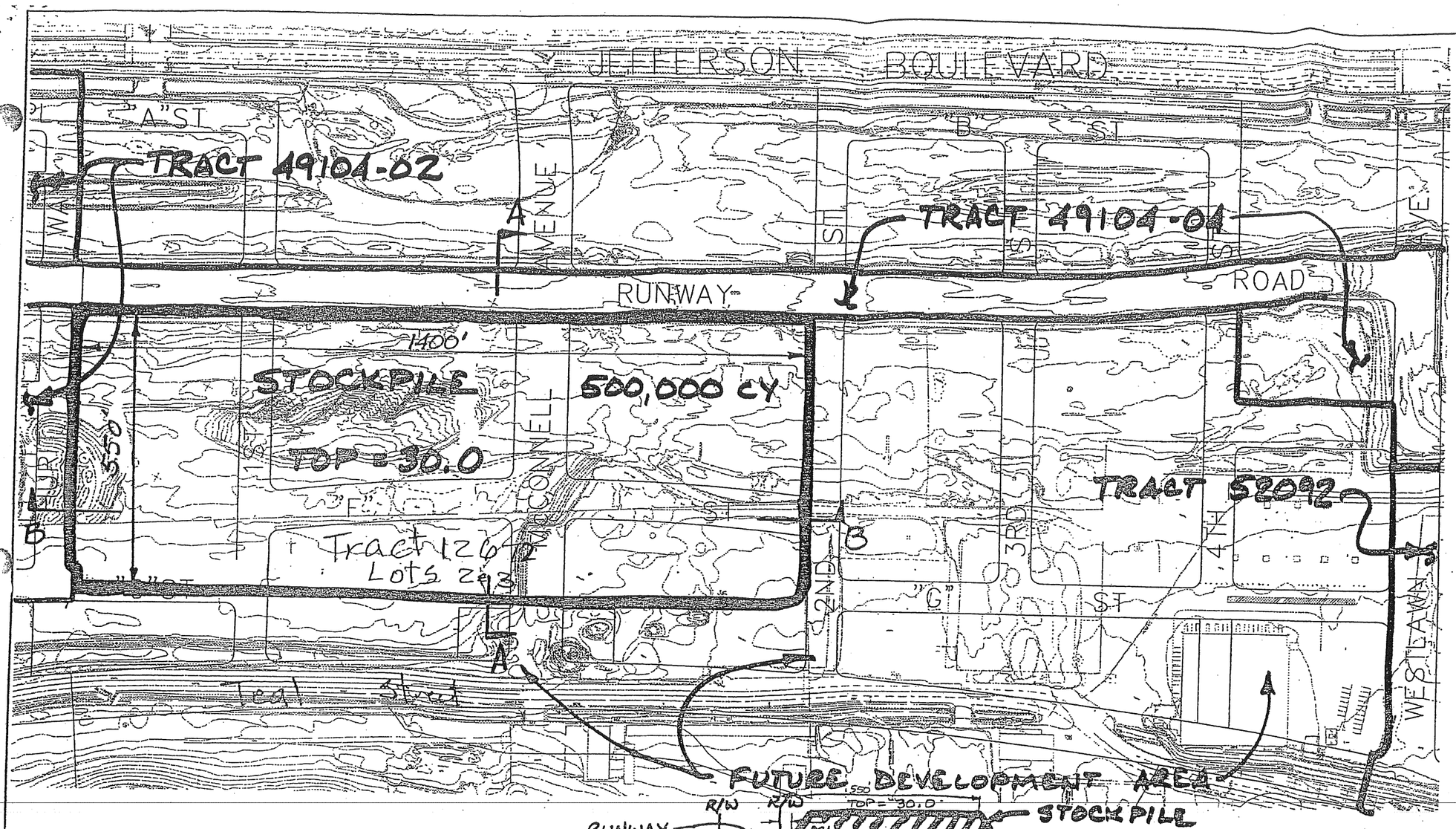
Sincerely,
Psomas

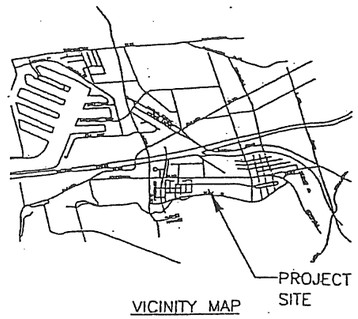
Michael J. Crehan, P.E.
Project Manager

Copy: Pat Larkin, Tim Connors, David Nelson – Playa Vista
Paul Pegg, James Slater, Jay Oldham – The Moote Group
Mike Kremer, Leticia Cordoso - Psomas







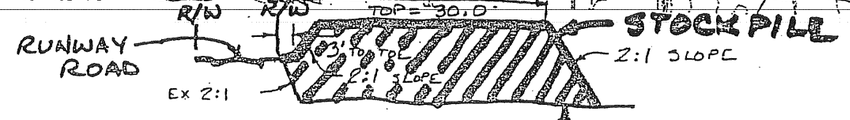


VICINITY MAP

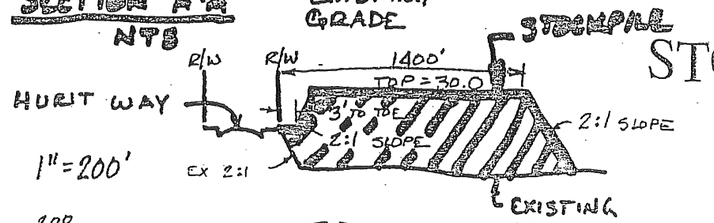
SCALE: 1" = 10,000'

NOTE:

FIELD TESTING OF SOIL GAS SAMPLING HAS BEEN COMPLETED IN THIS AREA. IF FURTHER SOILS GAS SAMPLING IS REQUIRED IN THIS AREA, STOCKPILE OPERATIONS WILL BE CONDUCTED IN SUCH A MANNER AS TO AVOID INTERFERING WITH SAID POTENTIAL SAMPLING. NO GRADING OPERATIONS WILL BE CONDUCTED UNDER THIS PERMIT.



SECTION A-A
NTS



SECTION B-B
NTS

1"=200'

100 0' 100 200

GRAPHIC SCALE

Note: For reduced sized prints, original scale is in inches

STOCKPILE EXHIBIT
EXHIBIT "A"

Playa Capital Company, LLC
Playa Vista Development

PSOMAS

DATE: 01/09/01 REVISED ON:
JOB No:1PCC0203.20

SHEET 1 OF 1

12200 W Jefferson Blvd
12100 W Jefferson Blvd

Permit #:
Plan Check #:
Event Code:

(A) 03030 - 10001 - 01224
Printed: 10/15/03 11:00 AM

ling
Commercial
Plan Check at Counter
No Submit Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 10/15/2003

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
TR 6265		96		M B 134-41/44	105B161 887	- -
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevation
Airport Hazard Area - 200' Height Limit Above Elevation
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Council District - OUTLA
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.010
District Map - 102B161
District Map - 105B161
Environmentally Sensitive Area - YES
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES

ZONE(S): C2(PV) /M(PV)./

4. DOCUMENTS

ZI - ZI-1320
ZI - ZI-1874
ZA - ZA-2000-1242-YV
ZA - ZA-2000-5255-YV
SPA - Los Angeles Coastal Transportatio
SPA - Playa Vista (Area D)
PKLY - PKG-LAYOUT-161
ORD - ORD-160523
DTRM - DIR-2000-3257
DTRM - DIR-2000-5369
CPC - CPC-1985-272-PA
CPC - CPC-1991-522-GPA-ZC
CPC - CPC-1991-523-HD
CPC - CPC-1999-2507-PAD-PV
CPC - CPC-1999-3186-PAD-PV
CPC - CPC-1999-500-PAD-PV

5. CHECKLIST ITEMS

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Capital Llt 12555 Jefferson Blvd. 300 LOS ANGELES, CA 90066

Tenant:
Applicant: (Relationship: Agent for Owner)
Moe Lahooti - Psomas 11444 W Olympic Blvd. 750 LOS ANGELES, CA 90064 (310) 564-2500

LA Department of Building and Safety
LA 01 20 070483 10/15/03 11:36AM
ONE STOP SURCH $588.05
SYSTEMS DEVT FEE $1,764.15
CITY PLANNING SURCH $882.08
MISCELLANEOUS $5.00
Total Due: $3,239.28
Cash: $3,239.28

7. EXISTING USE **PROPOSED USE**

(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

ADD.425,000 C. Y. TO PREVIOUSLY APPROVED STOCKPILE OF 125,000 C. Y. FOR A TOTAL OF 550,000 C. Y. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510.

9. # Bldgs on Site & Use:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Ricardo Tres DAS PC By:
OK for Cashier: Ricardo Tres Coord. OK:
Signature: Date:

For Cashier's Use Only W/O #: 33001224

LA Department of Building and Safety
LA 01 20 070483 10/15/03 11:34AM
Project: PLAYA VISTA
GRADING PERMIT $15,475.00
GRADING PLAN CHECK $13,927.50
Total Due: $29,402.50
No Fee: $29,402.50
NO FEE NO FEE NO FEE
Name: PLAYA VISTA CAPITAL LLC
Addr: 12200 W JEFFERSON BL
Auth: FEE WAIVER
Dept: PLAYA VISTA
03LA 49303

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 425,000 cu yd PC Valuation:

FINAL TOTAL Grading	32,641.78
Permit Fee Subtotal Grading	15,475.00
Plan Check Subtotal Grading	13,927.50
O.S. Surcharge	588.05
Sys. Surcharge	1,764.15
Planning Surcharge	882.08
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS

P030301000101224FY

11/18/03 07:49 FAX 310 954 3777 PSOMAS → VALENCIA 005

12200 W Jefferson Blvd

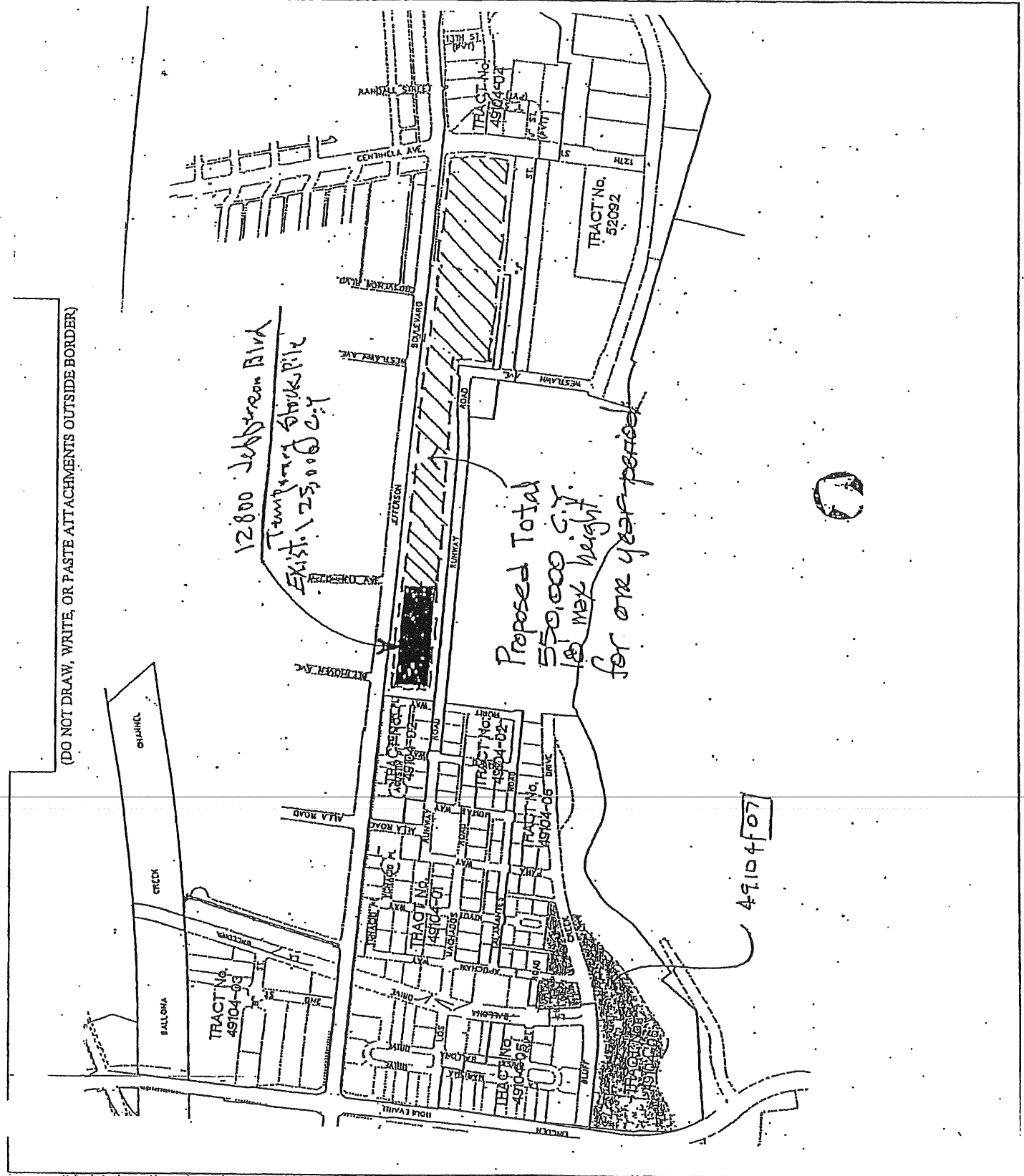
Permit Application #: 03030 - 10001 - 01224

Grading
Commercial
o Submit Plan Check

City of Los Angeles - Department of Building and Safety

PLOT PLAN ATTACHMENT

Plan Check #:
Initiating Office: METRO
Printed on: 10/08/03 11:58:17



COUNCIL DISTRICT: 11

PLOT PLAN ATTACHMENT

11/18/03 07:49 FAX 310 954 3777 PSOMAS → VALENCIA 006

City of Los Angeles - Department of Building and Safety

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951dh. & s.c.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 h. & S.C.)

For above requests, complete sections 1,2, & 3 in duplicate by printing in ink or typing.

READ

FILE NO.

DISTRIBUTION

- ☒ Owner ☒ LA ..... Pl Ck.
- ☒ Petitioner ☒ WLA ..... Insp.
- ☐ Fire ☐ ..... Bur.
- ☐ Health ☐ .....

JOB ADDRESS 12100 Jefferson Blvd

Owner Playa Capital, LLC.
Address 12555 W. Jefferson Blvd
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
Los Angeles CA zip 90064
Daytime Phone (310) 954-3700

LOT(S) 2 & 3 BLK
TRACT R. La Ballona

District Office W.LA Type —
Plan Ck No. CC Stories —
Zone CS (PV) / M (PV) Occ —
Permit No 05030 1000 / 01229 No. Units —
Job Order No. F.D. —
Bureau/Division Bldg / PC D.M. 105B 161
Use of Bldg. Temporary Stockpile C.D. 11
Job Status PC

- ☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
- ☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
- ☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To Allow the addition of Temporary Stock pile to the Existing 125,000 C.Y. Stockpile (Per Grading Permit # LA 05270834 07) for total of 550,000 C.Y see attached exhibit "A".

Dept. Comment Stockpile

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Playa Vista Project is still in need of imported Dirt. For detail Justification see attached Psomas letter dated Oct 8, 2003 and

Petitioner's Signature M. [signature] Position For Psomas Mike Lahoti Date 10/8/03

Reviewed By [signature] Date 10/08/03

DEPARTMENT ACTION: In accordance with ☒ Sec. 98.0403 L.A.M.C. ☐ Sec. 17951dH. & S.C. ☐ Sec. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information).

- ☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
- ☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
- ☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action by C. Kumake Date 10/14/03

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1.– This approval is for one year only
2.– Supplemental grading permit shall be obtained.
3.– Erosion control plans shall be approved by Public Works prior to permit issuance

LA Department of Building and Safety
01 10 090481 10/15/03 11:27AM
BOARD APPLIC FEE $100.00
Total Due $100.00
(Cashier Use Only) $100.00

No. Of Items
Fee Due $100.00
Fee Verified [signature]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, Statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) - Bd. Res. 832

..... Position ..... Date .....

Print Name .....

B & S COM-31 (R1/88)

11/18/03 07:48 FAX 310 954 3777 PSOMAS → VALENCIA 004

12100 W Jefferson Blvd
12200 W Jefferson Blvd

Permit #: 03030 - 10000 - 01224
Plan Check #:
Event Code:
Printed: 05/09/03 04:25 PM

Grading
mmercial
Check at Counter
bmit Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 05/09/2003

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
TR 6265		96		M B 134-41/44	105B161 887	- -
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevatio
Airport Hazard Area - 200' Height Limit Above Elevatio
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Council District - OUTLA
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.010
District Map - 102B161
District Map - 105B161
Environmentally Sensitive Area - YES
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES

ZONE(S): C2(PV) / M(PV) /

4. DOCUMENTS

ZI - ZI-1320
ZI - ZI-1874
ZA - ZA-2000-1242-YV
ZA - ZA-2000-5255-YV
SPA - Los Angeles Coastal Transportatic
SPA - Playa Vista (Area D)
PKLY - PKG-LAYOUT-161
ORD - ORD-160523
DTRM - DIR-2000-3257
DTRM - DIR-2000-5369
CPC - CPC-1985-272-PA
CPC - CPC-1991-522-GPA-ZC
CPC - CPC-1991-523-HD
CPC - CPC-1999-2507-PAD-PV
CPC - CPC-1999-3186-PAD-PV
CPC - CPC-1999-500-PAD-PV

5. CHECKLIST ITEMS

LA Department of Building and Safety
LA 05 27 083408 05/09/03 04:54PM

MAJOR PROJECTS REVIEW	$150.00
ONE STOP SURCH	$162.50
SYSTEMS DEVT FEE	$487.50
CITY PLANNING SURCH	$243.75
MISCELLANEOUS	$5.00
Total Due:	$1,048.75
Check:	$882.25
Check:	$166.50

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Capital Llt — 12555 Jefferson Blvd. 300 — LOS ANGELES CA 90066

Tenant:
Applicant: (Relationship: Agent for Owner)
Moe Lahooti - Psomas — 11444 W Olympic Blvd. 750 — LOS ANGELES CA 90064 — (310) 564-2500

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
125,000 cubic yard stockpile with expanded ground area authorized. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510.

9. # Bldgs on Site & Use:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By: Fred Wong
OK for Cashier: Fred Wong
DAS PC By:
Coord. OK:
Signature:
Date: 5/9/03

For Cashier's Use Only W/O #: 33001224
LA Department of Building and Safety
Project: PLAYA VISTA LA 05 27 083407 05/09/03 04:51PM

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period
Permit Valuation: 125,000 cu yd
PC Valuation:

FINAL TOTAL Grading	9,023.75
Permit Fee Subtotal Grading	7,975.00
Additional Plan Check	150.00
O.S. Surcharge	162.50
Sys. Surcharge	487.50
Planning Surcharge	243.75
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

GRADING PERMIT	$7,975.00
Total Due:	$7,975.00
No Fee:	$7,975.00

NO FEE NO FEE NO FEE
Name: PLAYA VISTA CAPITAL LLT
Addr: 12100 W JEFFERSON BL
Auth: PLAYA VISTA WAIVER
Dept: PLAYA VISTA

03LA 42400

Sewer Cap ID:
Total Bond(s) Due:

LA 05 27 083407 05/09/03 04:51PM

12. ATTACHMENTS
Plot Plan

13. STRUCTURE INVENTORY 03030 - 10000 - 01224

(P) Fill 125,000 cuyd

14. APPLICATION COMMENTS

Request for a Modification, file no. 10220 was approved by Mr. David Hsu, dated 11/05/02. Okay to issue grading permit.

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless, the information printed exceeds that required by Section 19825 of the Health and Safety Code of the State of California.

15. Building Relocated From:

16. CONTRACTOR, ARCHITECT, & ENGINEER NAME	ADDRESS	CLASS	LICENSE#	PHONE #
(O) , Owner-Builder			0	

PERMIT EXPIRATION

This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by the Dept. of Building & Safety (Sec. 22.12 & 22.13 LAMC).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code:
Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):

( ) I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

OR

(X) I, as the owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractors License Law.)

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

( ) I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

( ) I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier:_____ Policy Number:_____

(X) I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS ($100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION

I certify that notification of asbestos removal is either not applicable or was sent to the AQMD or EPA as per section 19827.5 of the Health and Safety Code.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the performance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed work will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere with such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

(1) I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration and Final Declaration; and

(2) This permit is being obtained with the consent of the legal owner of the property.

Print Name: Moe Lahoot For Planning Consultant Sign: [signature] Date: 5/9/03 ☐ Owner ☒ Authorized Agent

12100 W Jefferson Blvd. Permit Application #: 03030-10000-01224

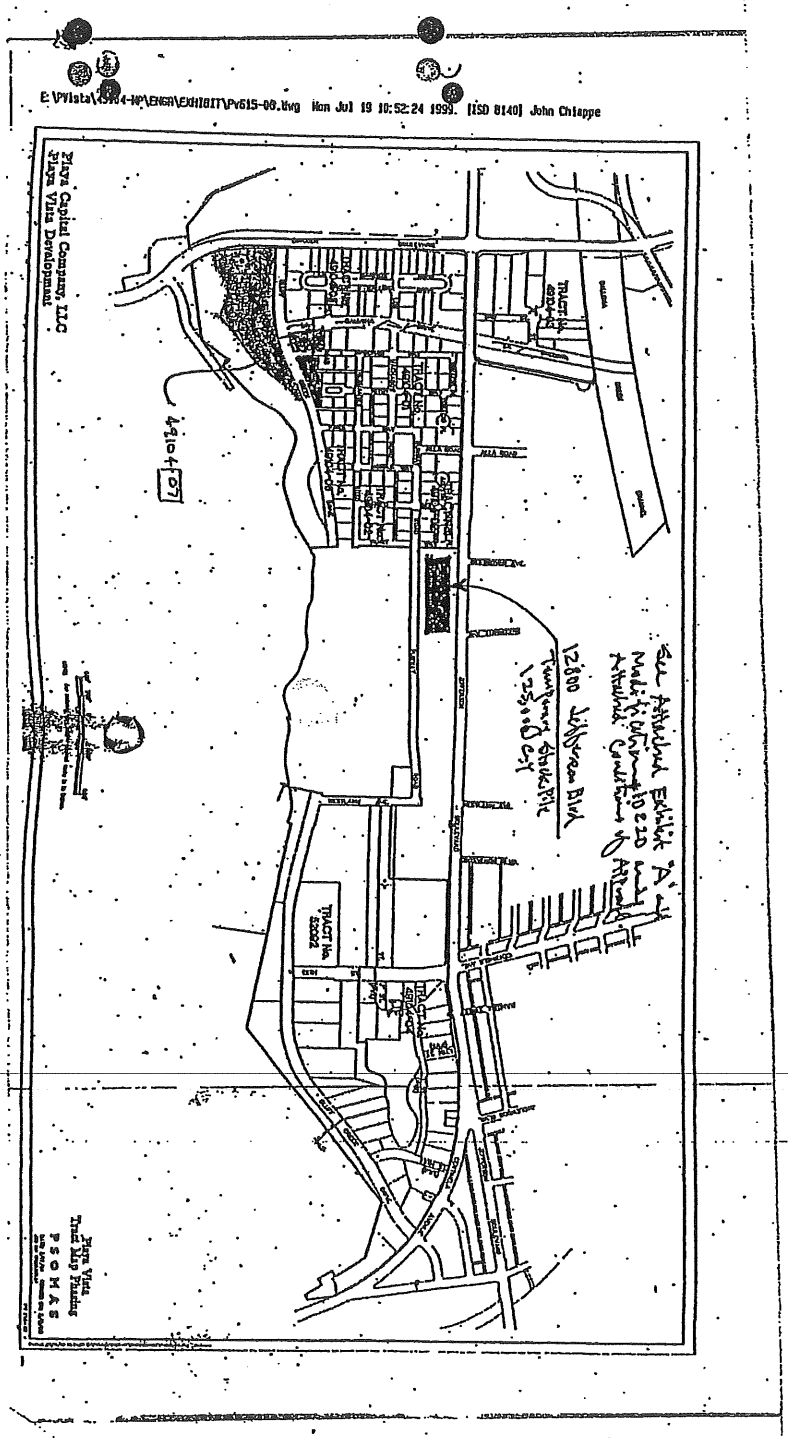
Grading
Commercial
No Submit Plan Check

City of Los Angeles - Department of Building and Safety

PLOT PLAN ATTACHMENT

Plan Check #:
Initiating Office: METRO
Printed on: 05/09/03 16:07:20

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



COUNCIL DISTRICT: 11

PLOT PLAN ATTACHMENT

12200 W Jefferson Blvd
12200 W Jefferson Blvd

Permit #: 03030 - 10000 - 01224
Plan Check #: (3)
Event Code:
Printed: 05/09/03 04:25 PM

Grading
Commercial
Plan Check at Counter
No Submit Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 05/09/2003

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
TR 6165		96		M B 134-41/44	105B161 887	- -
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030(	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevatio	Council District - OUTLA	District Map - 105B161
Airport Hazard Area - 200' Height Limit Above Elevatio	Certified Neighborhood Council - Westchester-Playa del	Environmentally Sensitive Area - YES
Area Planning Commission - West Los Angeles	Community Plan Area - Westchester - Playa del Rey	Energy Zone - 6
LADBS Branch Office - WLA	Census Tract - 2756.010	Fire District - 2
Council District - 11	District Map - 102B161	Earthquake-Induced Liquefaction Area - YES

ZONE(S): C2(PV)/M(PV)/

4. DOCUMENTS

ZI - ZI-1320	SPA - Los Angeles Coastal Transportatic	DTRM - DIR-2000-3257	CPC - CPC-1991-523-HD
ZI - ZI-1874	SPA - Playa Vista (Area D)	DTRM - DIR-2000-5369	CPC - CPC-1999-2507-PAD-PV
ZA - ZA-2000-1242-YV	PKLY - PKG-LAYOUT-161	CPC - CPC-1985-272-PA	CPC - CPC-1999-3186-PAD-PV
ZA - ZA-2000-5255-YV	ORD - ORD-160523	CPC - CPC-1991-522-GPA-ZC	CPC - CPC-1999-500-PAD-PV

5. CHECKLIST ITEMS

LA Department of Building and Safety
LA 05 27 083408 05/09/03 04:54PM

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Capital Llt — 12555 Jefferson Blvd. 300 — LOS ANGELES CA 90066

Tenant:

Applicant* (Relationship: Agent for Owner)
Moe Lahooti - Psomas — 11444 W Olympic Blvd. 750 — LOS ANGELES CA 90064 — (310) 564-1500

~~MAJOR PROJECTS REVIEW~~	~~$150.~~
ONE STOP SURCH	$162.
SYSTEMS DEVE FEE	$487.
CITY PLANNING SURCH	$243.
MISCELLANEOUS	$5.
Total Due:	$1,048.
Check:	$882.
~~Check:~~	~~$166.~~

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
125,000 cubic yard stockpile with expanded ground area authorized. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510.

9. # Bldgs on Site & Use:

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By: Fred Wong
DAS PC By:
OK for Cashier: Fred Wong
Coord. OK:
Signature:
Date: 5/9/03

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000, (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 33001224
LA Department of Building and Safety
Project: PLAYA VISTA 05/09/03 04:51PM

11. PROJECT VALUATION & FEE INFORMATION Fiscal Fee Period

Permit Valuation: 125,000 cu yd PC Valuation:

FINAL TOTAL Grading	9,023.75
Permit Fee Subtotal Grading	7,975.00
Additional Plan Check	150.00
O.S. Surcharge	162.50
Sys. Surcharge	487.50
Planning Surcharge	243.75
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

GRADING PERMIT	$7,975.1
Total Due:	$7,975.1
No Fee:	$7,975.1

NO FEE NO FEE NO FEE
Name: PLAYA VISTA CAPITAL LLT
Addr: 12100 W JEFFERSON BL
Auth: PLAYA VISTA WAIVER
Dept: PLAYA VISTA

03LA 42400

Sewer Cap ID: Total Bond(s) Due:

LA 05 27 083407 05/09/03 04:51PM

12. ATTACHMENTS
Plot Plan

12100 W Jefferson Blvd — Permit Application #: 03030-10000-01224

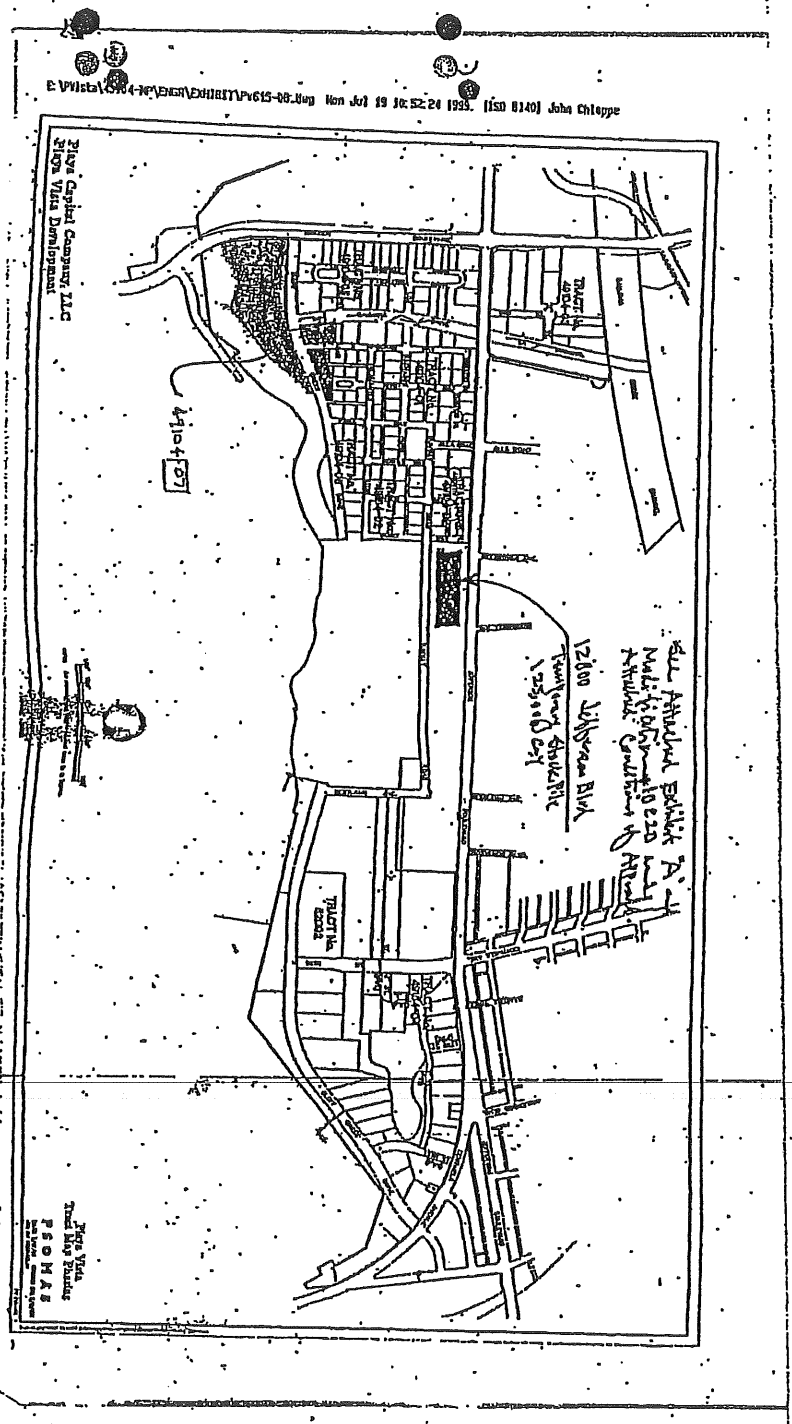
Grading
Commercial
No Submit Plan Check

City of Los Angeles - Department of Building and Safety

Plan Check #:
Initiating Office: METRO
Printed on: 05/09/03 16:07:20

PLOT PLAN ATTACHMENT

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



COUNCIL DISTRICT: 11

PLOT PLAN ATTACHMENT

City of Los Angeles - Department of Building and Safety

- ☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)
- ☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951dh. & s.c.)
- ☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 h. & S.C.)

For above requests, complete sections 1,2, & 3 in duplicate by printing in ink or typing.

READ

FILE NO.

DISTRIBUTION

- ☐ Owner ☐ ..... Pl Ck.
- ☐ Petitioner ☐ ..... Insp.
- ☐ Fire ☐ ..... Bur
- ☐ Health ☐ .....

JOB ADDRESS 12800 Jefferson Blvd.

LOT: Ramona S de Machado | 4211-013-043

TRACT: RANCHO LA BALLONA (D C C 2722 C F 64)

Owner.....Playa Vista Capital Llc....
Address....12555 Jefferson Blvd. Suite 300
Los Angeles CA Zip ..90066...
1 Daytime Phone (310).822-0074

Petitioner....Psomas (Mike Crehan)...
Address.....11444 W Olympic Blvd. Suite 750...
Los Angeles CA Zip ..90064.....
Daytime Phone (310) 954-3700....

District Office....WLA
Plan Ck No.....B01LA1068.
Zone.....C2(PV)
Permit No 01LA19539
Job Order No: ....
Bureau/Division ..Bldg. / PC
Use of Bldg. .....Park
Job Status ...Construction.

Type....
Stories...
Occ .....
No. Units .....
F.D. ...2..
D.M. ..99B157..
C.D. ....6..

- ☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
- ☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
- ☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

TO MODIFY CONDITION OF APPROVAL # 1 UNDER MODIFICATION # 10220 TO ALLOW 125,000 C. Y. TEMPORARY STOCKPILE PERMITTED UNDER PERMIT # 03LA42400 (03030-10000-01224) TO REMAIN UNTIL 5/9/04

Dept. Comment TEMPORARY STOCKPILE

Code Sections: L.A.M.C.– 91.0303 (D); 98.602

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24– 91.7011.3

STOCKPILE IS REQUIRED IN ORDER TO COMPLETE GRADING OPERATIONS THRU-OUT PLAYA VISTA SITE.

Petitioner's Signature [signature] Position Fr. Planner

Reviewed By [signature] Date 11-13-03

DEPARTMENT ACTION: In accordance with ☐ Sec. 98.0403 L.A.M.C. ☐ Sec. 17951dH. & S.C. ☐ Sec. 19957 H. & S.C.

The Request is ☐ Granted (See attached letter). ☐ Denied (See reverse for appeal information).

- ☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
- ☐ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.
- ☐ Condition (DOES) (DOES NOT) provide..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action by

Date

Conditions Of Approval: (Reasons For Appeal In Case of Denial)

1. THE PROPOSED WORK MUST CONFORM TO ALL PERTINENT LAWS, INCLUDING THOSE THAT HAVE BECOME OPERATIVE SINCE THE ISSUANCE OF THE ORIGINAL BUILDING PERMIT

(Cashier Use Only)

No. Of Items ONE
Fee Due $100 [signature]
Fee Verified .....

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, Statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) - Bd. Res. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R1/88)

11/14/03 08:46 FAX 310 954 3777 PSOMAS → VALENCIA 002

City of Los Angeles — Department of Building and Safety

- [X] REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)
- [ ] REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)
- [ ] REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sectipns 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 10220

DISTRIBUTION PAGE 1 OF 3

- [X] Owner [X] ..... Pl Ck.
- [X] Petitioner [X] L.A. ..... Insp.
- [ ] Fire [ ] ..... Bur.
- [ ] Health [ ] .....

JOB ADDRESS 12800 Jefferson Blvd

LOT(S) ARB 441 — BLK

TRACT Rancho La Ballona (MR3-204)

Owner ..... Playa Capital, LLC

Address 4255 W. Jefferson Blvd

Los Angeles CA Zip 90066

1 Daytime Phone (310) 822-2074

Petitioner ..... Psomas

Address 11444 W. Olympic Blvd #750

Los Angeles CA Zip 90064

Daytime Phone (310) 954-3700 — Moe

District Office W. LA. Type .....
Plan Ck No. — Stories .....
Zone ..... Occ. .....
Permit No. — No. Units .....
Job Order No. ..... F. D. .....
Bureau/Division ENG / PL CK D. M. .....
Use of Bldg. Temporary Stock Pile C. D. .....
Job Status Under Construction

- [ ] YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
- [ ] POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
- [ ] SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Allow 125,000 C.Y Temporary Stockpile to use for the Grading operations to Complete Proposed Grading on Tract 49104-04 & 52092 under existing Approved (Paid) Permits. See attached Psomas Letter & Exhibit A

Duration: Temporary Stock Pile For One Year.

Dept. Comment TEMPORARY STOCK PILE

Code Sections: L.A.M.C. — 91.7011.3

Title 24 —

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Playa Capital has the immediate opportunity to import 125,000 C.Y dirt from off site Sources to Complete Proposed Grading work under existing (Approved & Paid) Permits.

Petitioner's Signature ..... Position For Psomas Moe Lahsaei Date 11.05.02

Reviewed By ..... Date 11/5/02

DEPARTMENT ACTION: In accordance with [X] Sect. 98.0403 L.A.M.C. [ ] Sect. 17951d H. & S.C. [ ] Sect. 19957 H. & S.C.

The Request is [X] Granted (See attached letter). [ ] Denied (See reverse for appeal information.)

- [ ] Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
- [X] Request [IS] (IS NOT) in conformity with the spirit and purpose of Code Section involved.
- [ ] Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

11/5/02 Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

SEE PAGE 2 OF 3

(Cashier Use Only)

No. of Items 6 04 3 8 16

Fee due Waived per Lee

Fee verified A.D.

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

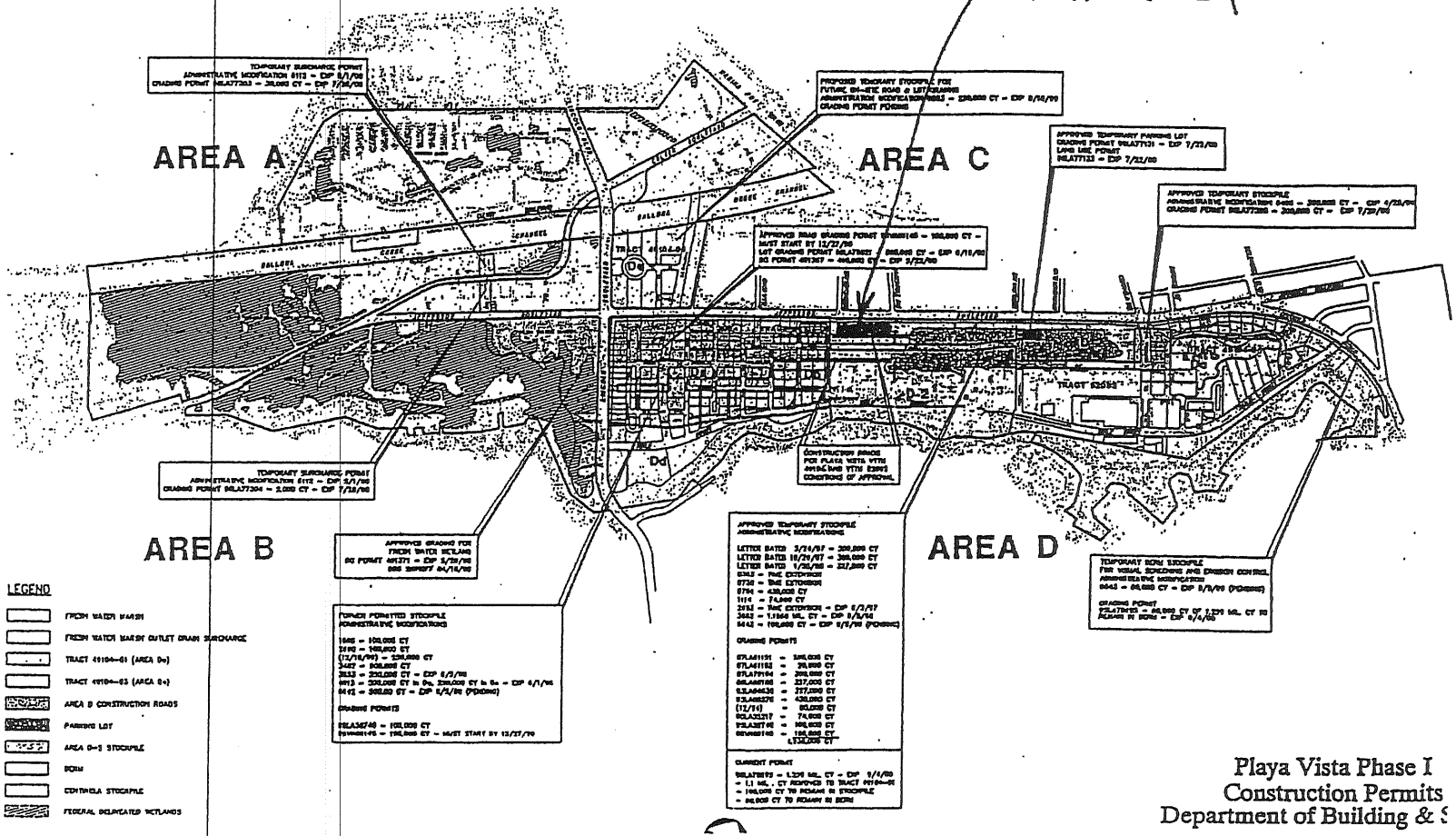
X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R1/88)

1. This approval is only for a 125,000 CY stockpile located as shown on drawing titled "Stock Pile Exhibit A" of the GDC/Psomas report dated 10/17/2002. This approval is for import only. This approval expires 11/06/2003.
2. Obtain approval from soils engineer for the soils to be imported to the site.
3. The soils engineer shall verify that the imported soils are free of contamination.
4. The stockpile shall not exceed 14 feet in height and the slope shall not be steeper that 2:1 (horizontal to vertical).
5. Adequate temporary erosion control devices acceptable to the Building Department, and to the Department of Public Works, shall be provided and maintained during the rainy season.
6. Prior to any site development a detailed soil report shall be provided to the Department for a review and approval.

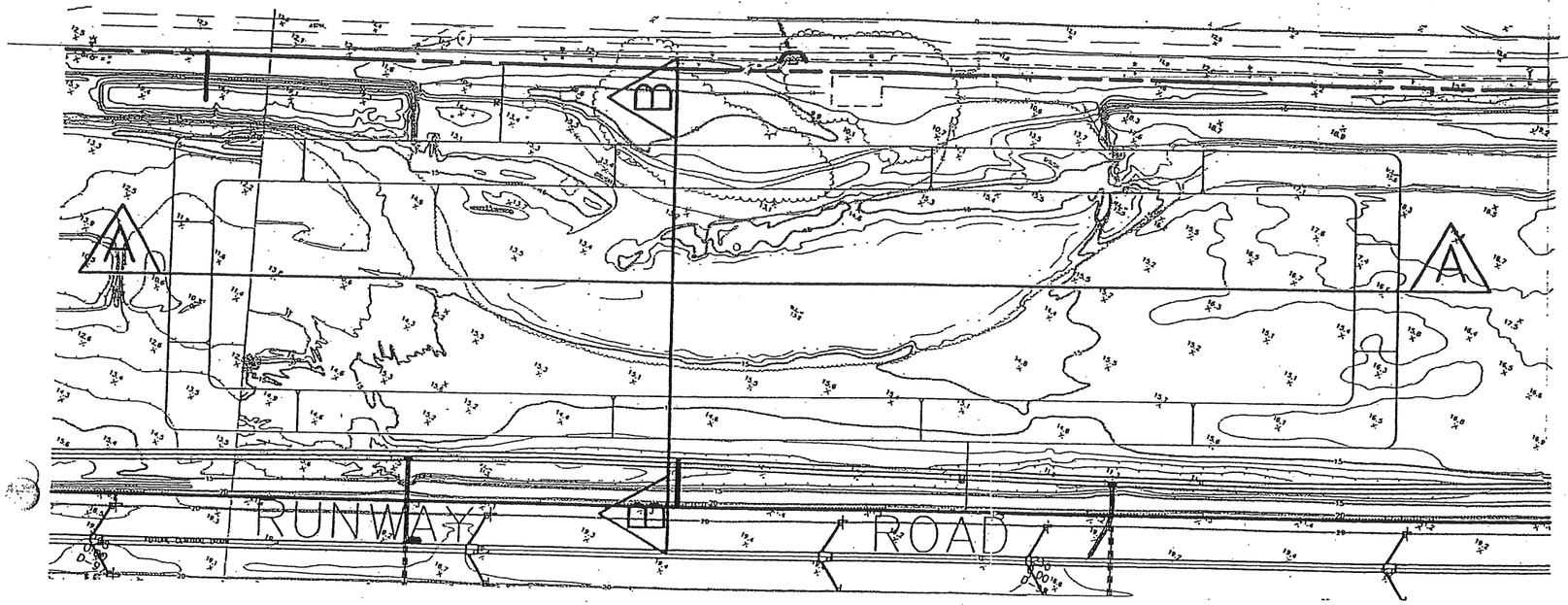
Stock Pile Location
125,000 C.Y



Playa Vista Phase I
Construction Permits
Department of Building & S

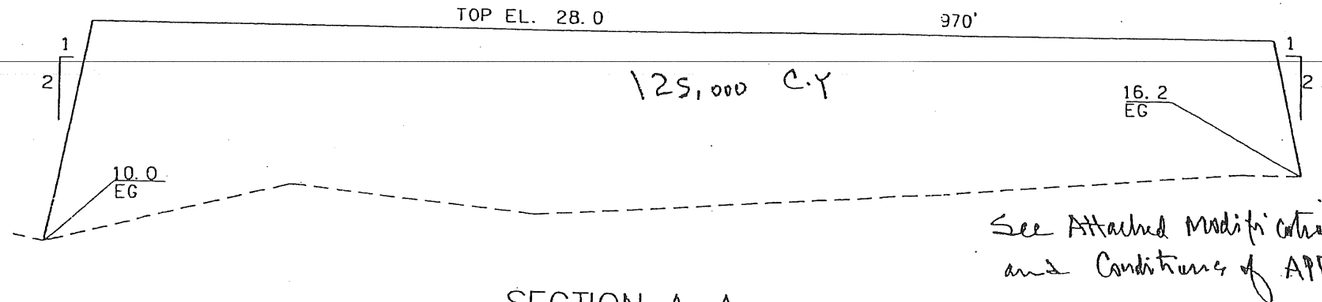
TRACT: RANCHO LA BALLONA
LOT: ARB 44
FILE # 10280

STOCKPILE PERMIT EXHIBIT "A" - 1280 Jefferson Blvd 10/28/02



100' 50' 0' 100' 200'

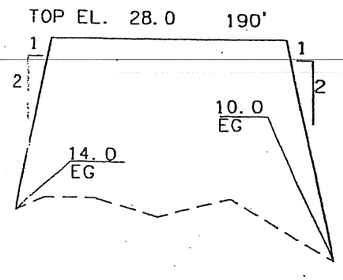
Note: For reduced size prints, original scale is in inches.



See Attached Modification #1022D and Conditions of Approval.

SECTION A-A

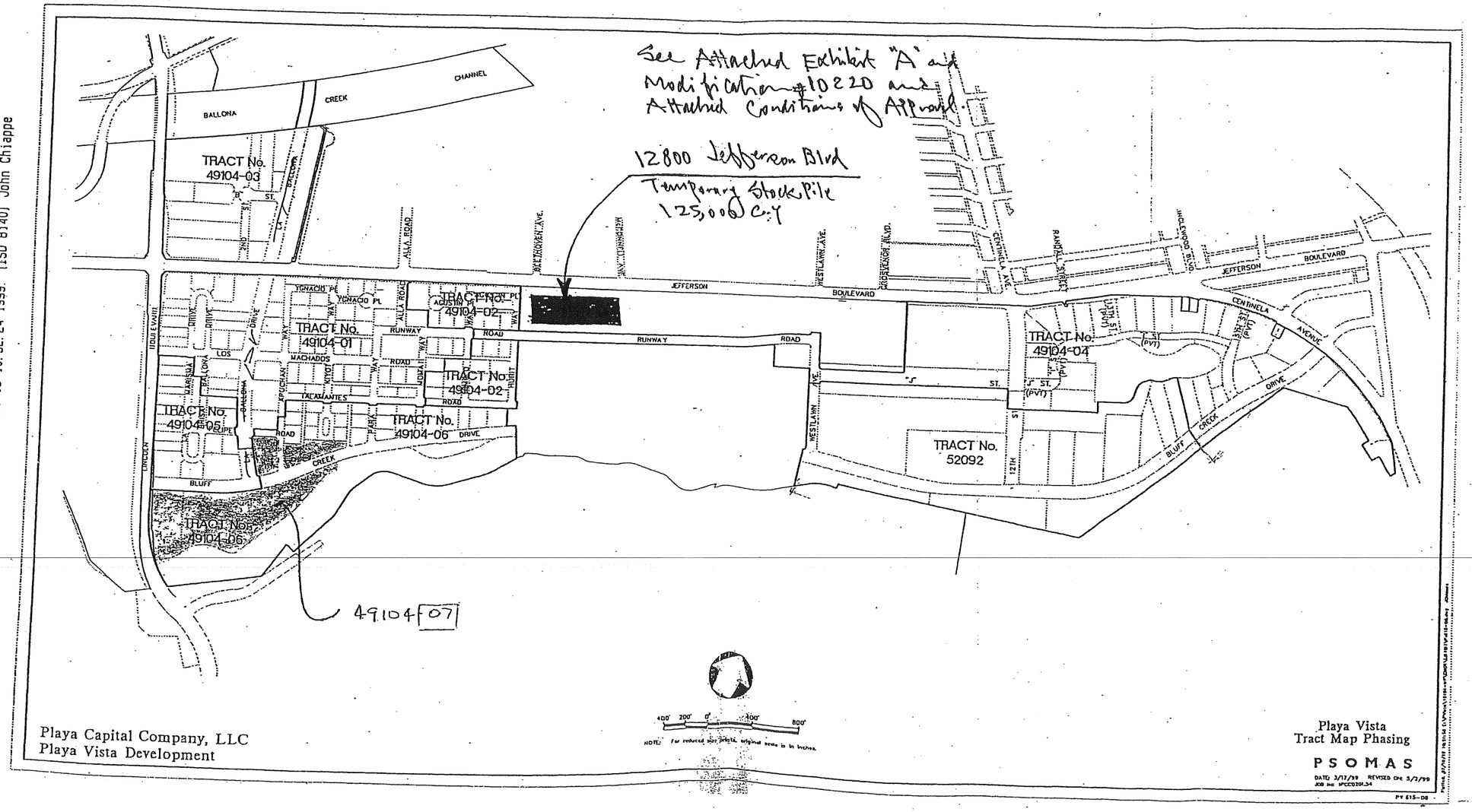
H: 1" =100'
V: 1" = 10'



SECTION B-B

H: 1"=100'
V: 1" = 10'

Dulen Lewis 331° 35'



E:\PVista\49104-MP\ENGR\EXHIBIT\Pv615-08.dwg Mon Jul 19 10:52:24 1999 [ISD 8140] John Chiappe

City of Los Angeles — Department of Building and Safety

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 6043
	DISTRIBUTION
	☒ Owner ☐ ..... Plck.
	☒ Petitioner ☒ ...WL... Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS: 6775 Centinela Avenue

LOT(S) 2 and 3 BLK

TRACT 12672

Owner .... PLAYA CAPITAL COMPANY, LLC,
Address ... 12555 W. Jefferson Blvd., Suite 300
... Los Angeles, CA ..... Zip 90066
Daytime Phone (310) 822-0074

1

Petitioner PSOMAS AND ASSOCIATES
Address ... 3420 Ocean Park Blvd., Suite 1040
... Santa Monica, CA Zip 90405
Daytime Phone (310) 450-1217

District Office W. L. A. Type .....
Plan Ck No. ..... Stories .....
Zone M Occ. .....
Permit No. 98LA78695 No. Units .....
Job Order No. ..... F. D. II .....
Bureau/Division EBG/PC D. M. 105 B165
Use of Bldg. Stockpile C. D. 6
Job Status .....

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stockpile of 1.259 million cy of dirt authorized by previous modifications, most recently 3852, which expires on 9/5/98. Petitioner requests that a time extension is issued to allow 100,000 cy of the stockpile to remain for one additional year, and 60,000 cy of stockpile to remain in visual screening and erosion control berm for period of one year (see attached exhibit for location).

Dept. Comment Extend time for stockpile

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Owner has removed 1.1 million cy of stockpile authorized by Mod. 3852 and Grading Permit 98LA78695. The dirt has been moved along approved construct. roads to Tract 49104-01, where it is being used as fill for grading under permits 95VN86145 and Mod. 4061 (time extension), 98LA76021 and BC#401367. Owner requests a time extension to allow the remaining dirt to stay in the screening/erosion control berm (60,000 cy) and stockpile (100,000 cy).

Petitioner's Signature Jonathan Psomas Position PSOMAS Date 9/3/98

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide .....
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Representative ..... Date 9-18-98

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

09/03/98 12:15:15PM LA05 T-6414C
BOARD APPLIC F 100.0
TOTAL 100.00
CHECK 100.00

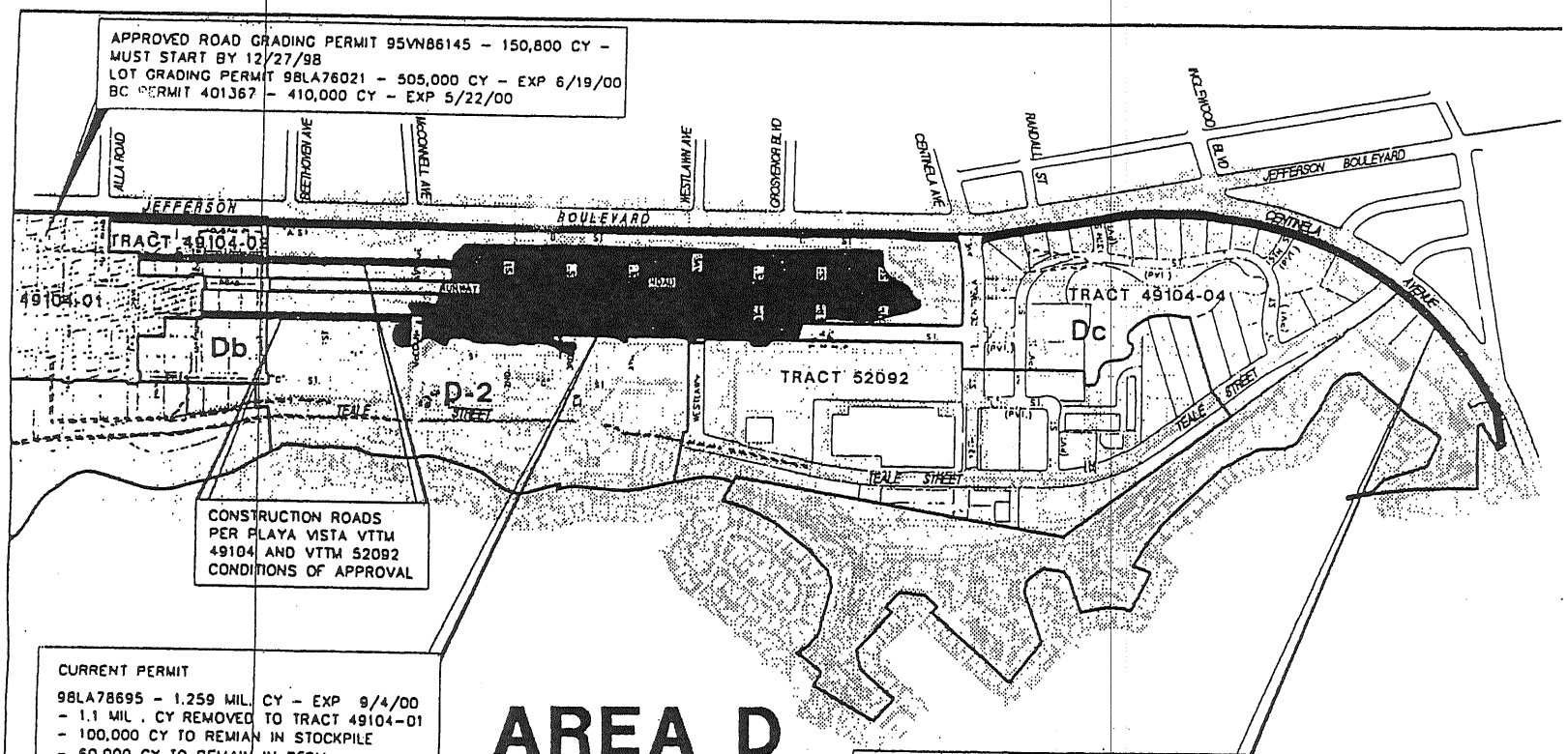
(Cashier Use Only)

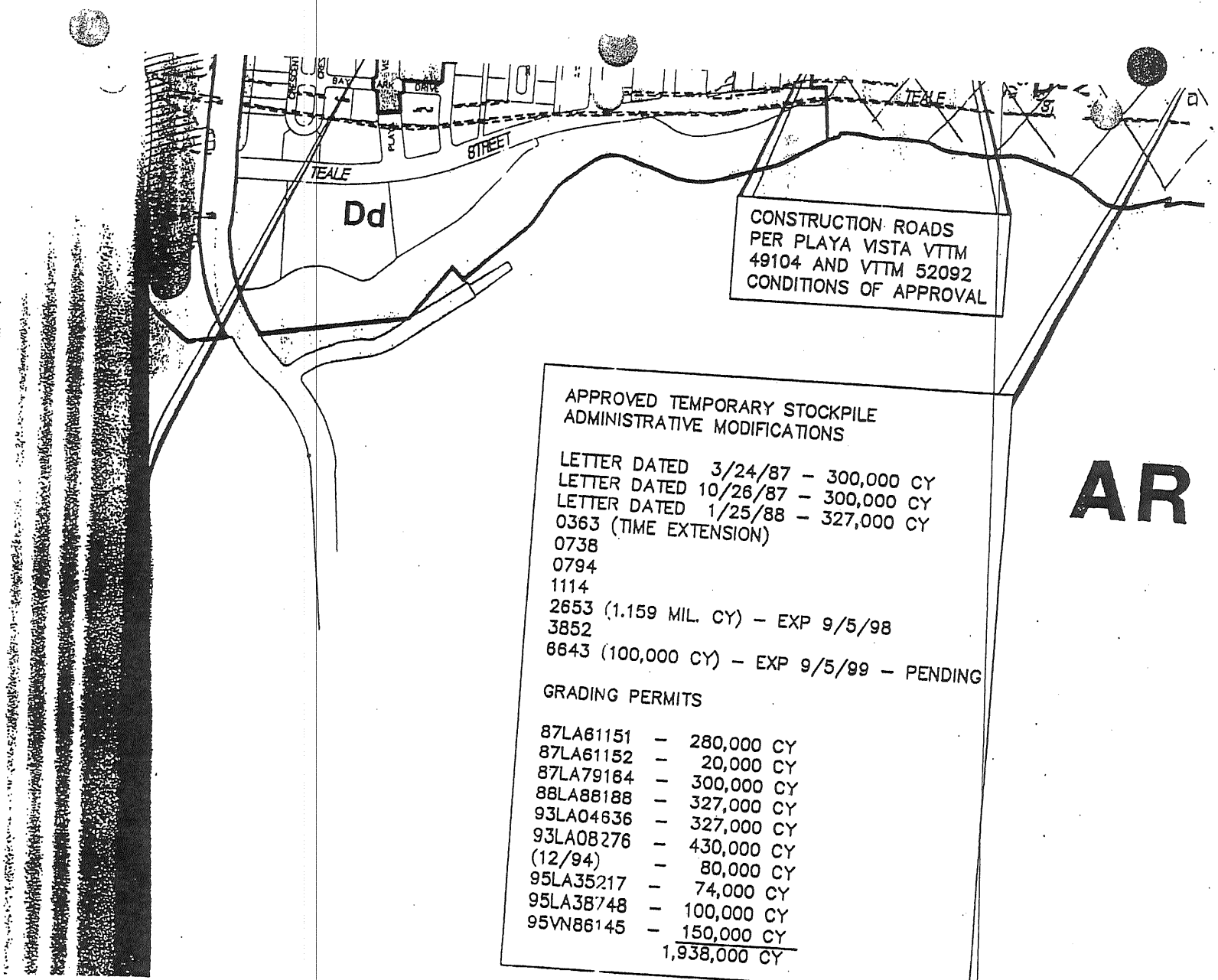
No. of Items .....1.....
Fee due ....$100.00.....
Fee verified ..L.K.....

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 532


APPROVED ROAD GRADING PERMIT 95VN86145 – 150,800 CY – MUST START BY 12/27/98
LOT GRADING PERMIT 98LA76021 – 505,000 CY – EXP 6/19/00
BC PERMIT 401367 – 410,000 CY – EXP 5/22/00
ALLA ROAD
BEETHOVEN AVE
MCCONNELL AVE
WESTLAWN AVE
OVERHILL BLVD
CENTINELA AVE
RANDALL ST
LINCOLN BLVD
JEFFERSON BOULEVARD
CENTINELA AVENUE
TRACT 49104-02
49104-01
TRACT 49104-04
Db
Dc
D-2
TRACT 52092
TEALE STREET
CONSTRUCTION ROADS PER PLAYA VISTA VTTM 49104 AND VTTM 52092 CONDITIONS OF APPROVAL
CURRENT PERMIT
98LA78695 – 1.259 MIL. CY – EXP 9/4/00
– 1.1 MIL. CY REMOVED TO TRACT 49104-01
– 100,000 CY TO REMIAN IN STOCKPILE
– 60,000 CY TO REMAIN IN BERM
APPROVED TEMPORARY STOCKPILE ADMINISTRATIVE MODIFICATIONS
LETTER DATED 3/24/87 – 300,000 CY
LETTER DATED 10/26/87 – 300,000 CY
LETTER DATED 1/25/88 – 327,000 CY
0363 – TIME EXTENSION
0738 – TIME EXTENSION
0794 – 430,000 CY
1114 – 74,500 CY
2653 – TIME EXTENSION – EXP 6/3/97
3852 – 1 MIL. CY – EXP 9/5/98
6643 – 100,000 CY – EXP 9/5/99 (PENDING)
AREA D
TEMPORARY BERM STOCKPILE FOR VISUAL SCREENING AND EROSION CONTROL ADMINISTRATIVE MODIFICATION
6643 – 60,000 CY – EXP 9/5/99 (PENDING)
GRADING PERMIT
98LA78695 – 60,000 CY OF 1.259 MIL. CY TO REMAIN IN BERM – EXP 9/4/00



APPROVED TEMPORARY STOCKPILE
ADMINISTRATIVE MODIFICATIONS

LETTER DATED 3/24/87 – 300,000 CY
LETTER DATED 10/26/87 – 300,000 CY
LETTER DATED 1/25/88 – 327,000 CY
0363 (TIME EXTENSION)
0738
0794
1114
2653 (1.159 MIL. CY) – EXP 9/5/98
3852
6643 (100,000 CY) – EXP 9/5/99 – PENDING

GRADING PERMITS

87LA61151	–	280,000 CY
87LA61152	–	20,000 CY
87LA79164	–	300,000 CY
88LA88188	–	327,000 CY
93LA04636	–	327,000 CY
93LA08276	–	430,000 CY
(12/94)	–	80,000 CY
95LA35217	–	74,000 CY
95LA38748	–	100,000 CY
95VN86145	–	150,000 CY
		1,938,000 CY

AR

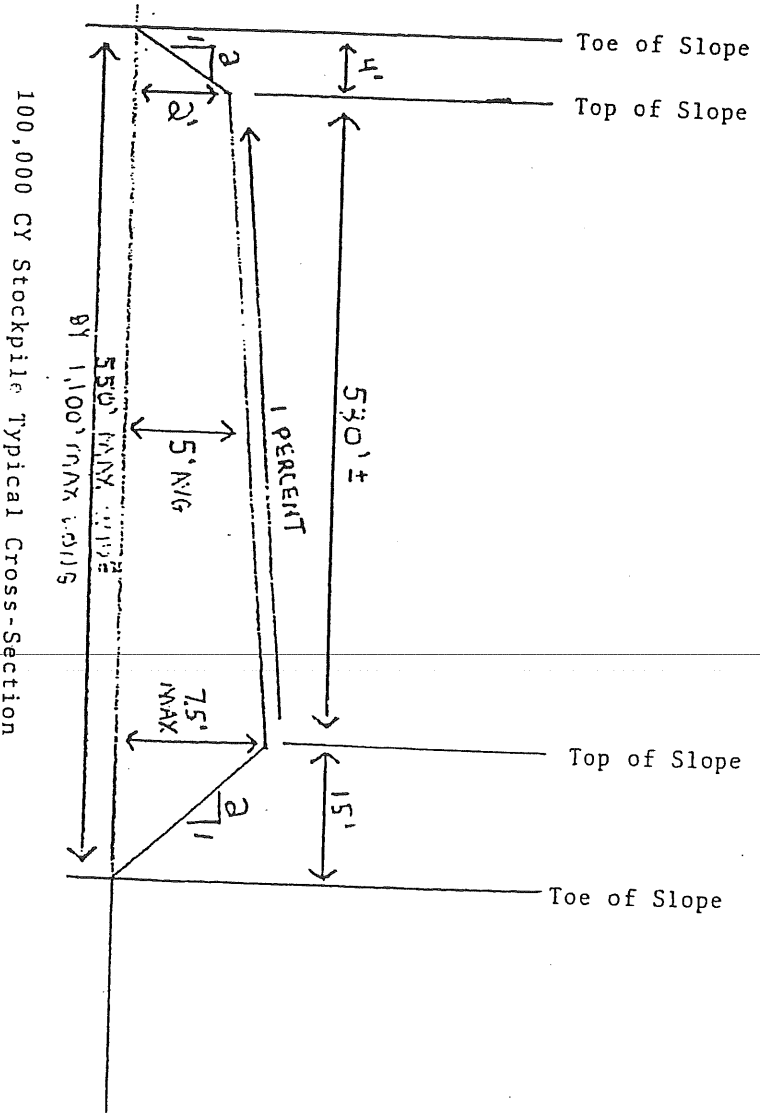
PSOMAS

☐ Santa Monica 310/450-1217
☐ Costa Mesa 714/751-7373
☐ Riverside 909/787-8421
☐ Sacramento 916/929-7100

Job No. _____ Sheet _____ of _____
Project Name _____
Prepared By _____ Date _____
Reviewed By _____ Date _____
Revised By _____ Date _____

* not to scale

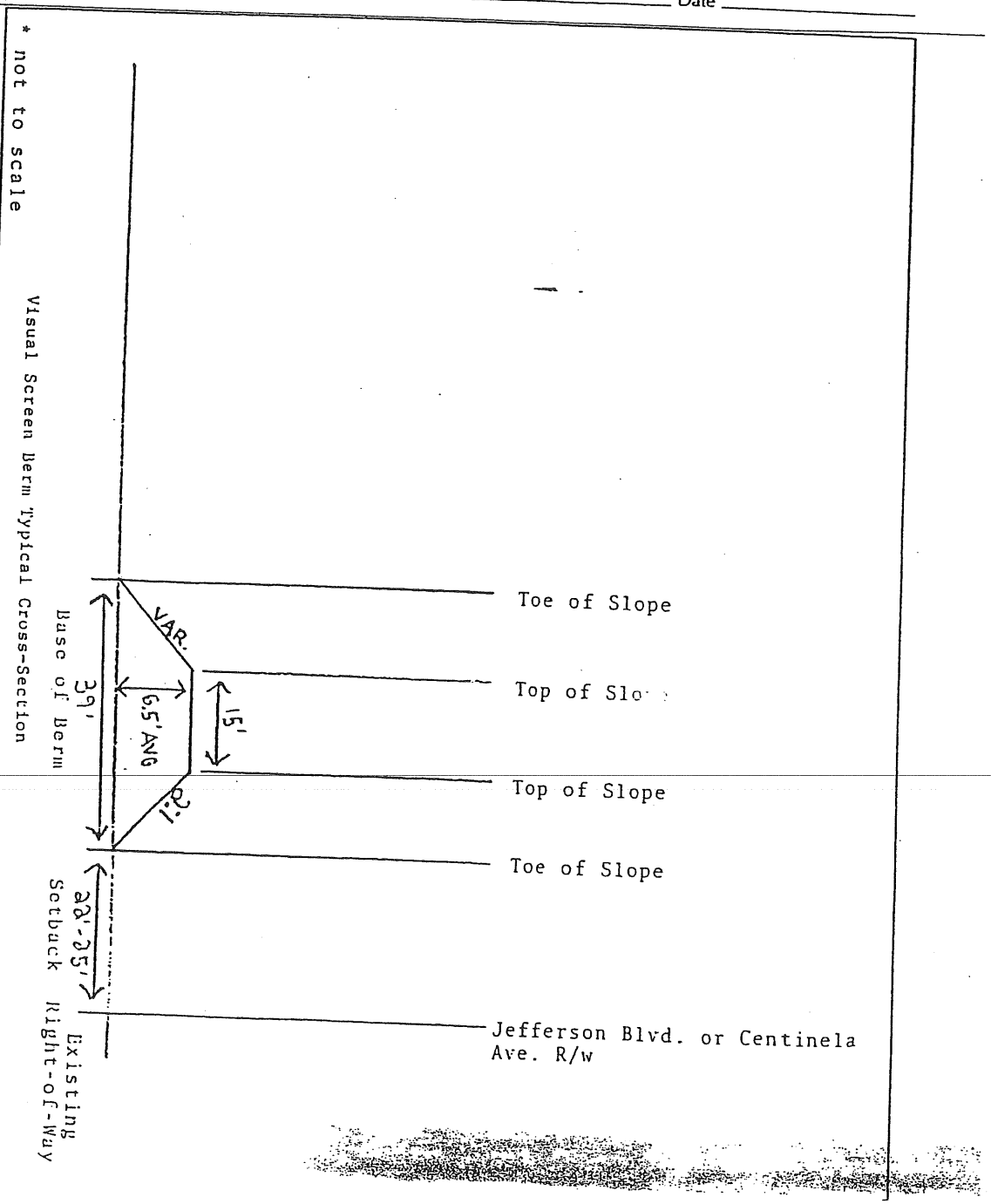
100,000 CY Stockpile Typical Cross-Section



PSOMAS

- [x] Santa Monica 310/450-1217
- [ ] Costa Mesa 714/751-7373
- [ ] Riverside 909/787-8421
- [ ] Sacramento 916/929-7100

Job No. 1PCC0201-35 Sheet 1 of 1
Project Name PLAYA VISTA
Prepared By _____ Date _____
Reviewed By _____ Date _____
Revised By _____ Date _____



City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 7455
	DISTRIBUTION
	☒ Owner ☐ ..... Pl Ck.
	☒ Petitioner ☒ ....W.L.A.... Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Avenue | LOT(S) 2 and 3 | BLK | TRACT 12672

Owner Playa Capital Company, L.L.C.
Address 12555 W. Jefferson Blvd., Suite 300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

1

Petitioner Psomas and Associates
Address 11444 W. Olympic Boulevard #750
W. Los Angeles CA Zip 900
Daytime Phone (310) 954-3745

District Office W.L.A.	Type
Plan Ck No.	Stories
Zone	Occ.
Permit No. 98LA18695	No. Units
Job Order No.	F. D.
Bureau/Division EBC/PC.	D. M. 105.B165.
Use of Bldg. Stockpile	C. D. 6
Job Status	

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stockpile (100,000 CY) and Existing Screening/erosion Control berm (60,000 CY). See Attached Plot Plan for Location). + Modification #6643

Dept. Comment Extension of time for stockpile and berm.

Code Sections: L.A.M.C.– 7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading work is in progress. Berm is crossing several different phases of the project.

Petitioner's Signature Moe Lahiati For: Psomas and Associates Position Consultant Date 9.15.99

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Dana Pirnat
Department Action By

9/23/99
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This extension will expire in one year from the date of approval.

(Cashier Use Only)

No. of Items one 1
Fee due $ 100.00
Fee verified JJ

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....

6775 W Centinela Ave

Permit Application #:

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

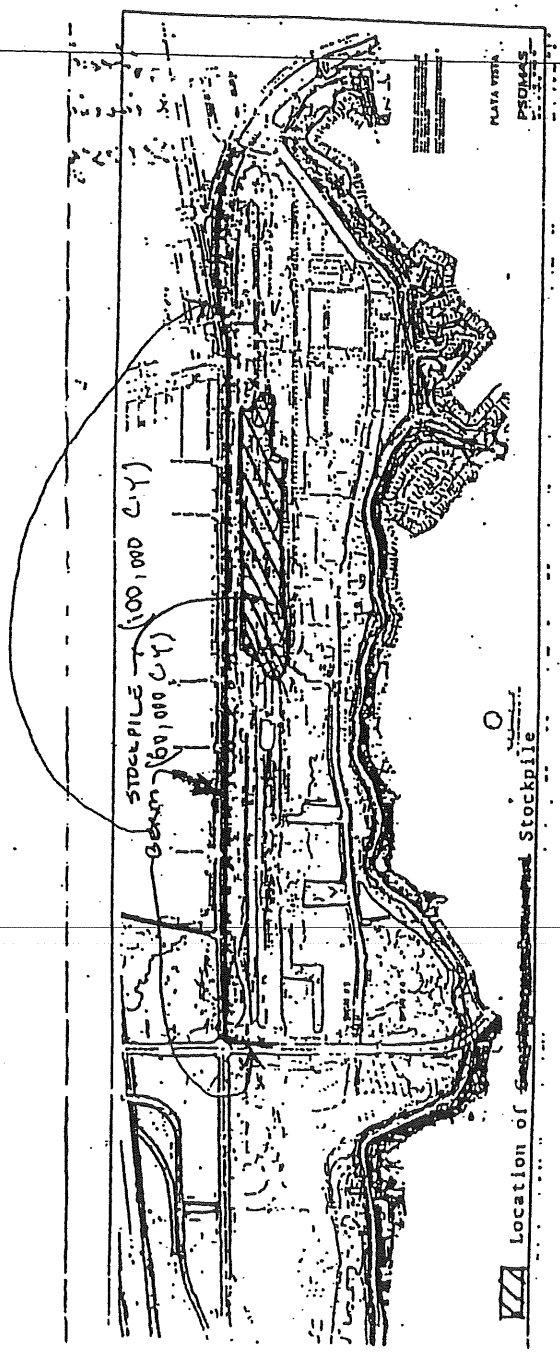
Over the Counter Permit

PLOT PLAN ATTACHMENT

Initiating Office: METRO

Printed on: 09/04/98 16:06:(

(DO NOT DRAW, WRITE OR PASTE ATTACHMENTS OUTSIDE BORDER)



City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

or above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 8247

DISTRIBUTION

☒ Owner ☐ ..... Pl Ck.
☒ Petitioner ☒ W.L.A. ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 BLK

TRACT 12672

Owner Playa Capital Company, LLC

Address 12555 W. Jefferson Blvd., Suite 300

Los Angeles CA Zip 90066

1 Daytime Phone (310) 822-0074

Petitioner P. Somas

Address 444 W. Olympic Blvd #750

W. Los Angeles CA Zip 90064

Daytime Phone (310) 954-3745

District Office W.L.A. Type .....
Plan Ck No. ..... Stories .....
Zone ..... Occ. .....
Permit No. 98LA7B695 No. Units .....
Job Order No. ..... F. D. .....
Bureau/Division Building & Safety D. M. 105 D165.
Use of Bldg. Stock Pile C. D. 6
Job Status "Berms"

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stock pile (100,000 CY) and existing screening / erosion control berm (60,000 CY).
(See attached Plot Plan for Location & Copy of Original Modification 6643 and Modification 7455).

Dept. Comment Extension of Time

Code Sections: L.A.M.C. – 91.7011.3

Title 24 –

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading work for all areas of project is not finished. Existing berm is crossing several different phases of the Project.

Petitioner's Signature Moe Kahati for Somas Position Consultant Date 9/06/2000

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide .....
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 9-25-00

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year.

LA Department of Building and Safety
LA 04 10 018228 09/06/00 04:40PM

BOARD APPLIC FEE $100.00

Total Due: $100.00
No Fee: $100.00
(Cashier Use Only)

NO FEE NO FEE NO FEE

Name: PLAYA VISTA
Addr: 6775 CENTINELA AV
Auth: FEE WAIVER 100.00
Dept: PLAYA VISTA MT

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....

6775 W Centinela Ave

Permit Application #: [illegible]

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

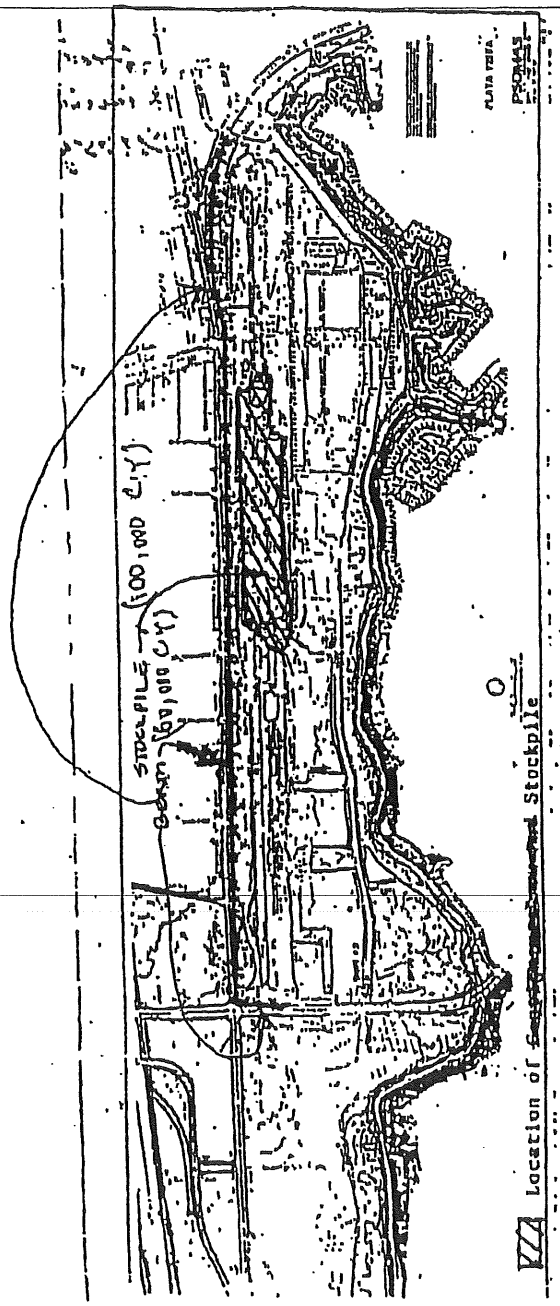
Initiating Office: METRO

Over the Counter Permit

PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



6775 W Centinela Ave JON

Permit #: 98030 - 10000 - 01912
Plan Check #: Reference #:
Event Code:

Grading

Over the Counter Permit

City of Los Angeles - Department of Building and Safety
APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Status: Ready to Issue
Status Date: 09/04/98
Printed on: 09/04/98 16:03:10

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
~~RANCHO SAUSAL RED~~		~~LT 38 T2S R14W~~	~~441~~	~~PAT 1-507/508~~	~~105B165 538~~	~~4211 - 011 - 023~~

3. PARCEL INFORMATION

No-Zone Permit -
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Census Tract - 2770.000
District Map - 105B165
Energy Zone - 6
Thomas Brothers Map Grid - 672

ZONE(S):

4. DOCUMENTS

5. CHECKLIST ITEMS

CEQA - CEQA Exempted09/04/98

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co Llc 12555 Jefferson Blvd STE 300 LOS ANGELES CA 90066

Tenant:

Applicant: (Relationship: Agent for Owner)
- Psomas & Assoc 3420 Ocean Park Blvd #1040 SANTA MONICA, CA 90405 (310) 450-1217

7. EXISTING USE

PROPOSED USE
60 Grading - Non-Hillside

8. DESCRIPTION OF WORK
1,100,000 cu yds removal from stockpile of 1,259,000 cu yds -Remaining Volume 160,000 cu yds [100,000 cu yds "stockpile" + "berm" 60,000 cu yds]

9. # Bldgs on Site & Use: VACANT

For information and/or inspection requests originating within LA County, call toll-free (888)-LA4BUILD; outside LA County, call (213)-977-6941.

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: DAS PC By:
OK for Cashier: Armando Flores Coord. OK: _____
Signature: Date:

For Cashier's Use Only W/O #: 83001912

09/04/98 04:17:00PM LA07 1-0556 C 29
GRADING PLAN C 20.00
INVOICE 4 [illegible] PP
[illegible] [illegible]
[illegible] [illegible]
[illegible] [illegible]
MISCELLANEOUS [illegible]
CITY PLAN SURC 5.40
TOTAL 204.80
CASH 220.00
CHANGE 15.20

98LA 78695

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 50 cu yd PC Valuation: 0 cu yd

FINAL TOTAL Grading	204.80
Permit Fee Subtotal Grading	160.00
Plan Check Subtotal Grading	0.00
O.S. Surcharge	3.60
Sys. Surcharge	10.80
Planning Surcharge	5.40
Planning Surcharge Misc Fee	5.00
[illegible]t Issuing Fee	20.00

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS
Misc. (See Comments)

DEPARTMENT OF BUILDING AND SAFETY

INSPECTION RECORD

CITY OF LOS ANGELES

Do Not Call for Framing Inspection Until Electrical, Plumbing & Heating Approvals have been Obtained.

Inspections	Date	Inspector
Rough Electrical		
Rough Plumbing		
Rough Heating & Refrig.		
Rough Disabled Access		
Rough Framing		
Rough Fire Sprinklers		
Insulation		
OK to Cover		
DO NOT COVER UNTIL ABOVE IS SIGNED		
Exterior Lathing		
Interior Lathing		
OK to Plaster		
DO NOT PLASTER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE BUILDING		
Sewer		
Gas		
Heating & Refrigeration		
Electrical Underground		
FINAL INSPECTIONS		
Final Electrical		
Final Gas		
Final Plumbing		
Final Heating & Refrigeration		
Final Fire Sprinklers		
Final L.A.F.D. OK Title 19 Jobs Only		
Final Disabled Access		
Final Grading		
Final		

ADDRESS OF JOB

NATURE OF WORK

BLDG. PERMIT NO. 98LA 78695
09/04/98 04:19:0
LA03 T-0586 C 29

OWNER

Inspections	Date	Inspector
GRADING INSPECTIONS		
Initial Grading		
Toe or Bottom		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Excavation		
Fill		
Drainage Devices		
Rough Grading		
BUILDING AND MECHANICAL INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
DO NOT PLACE CONCRETE UNTIL ABOVE IS SIGNED		
Heating & Refrig. Groundwork		
Electrical Groundwork		
Plumbing Groundwork		
Gas Piping Groundwork		
OK to Place Slab Floor		
DO NOT PLACE CONCRETE SLAB FLOOR UNTIL ABOVE IS SIGNED		

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

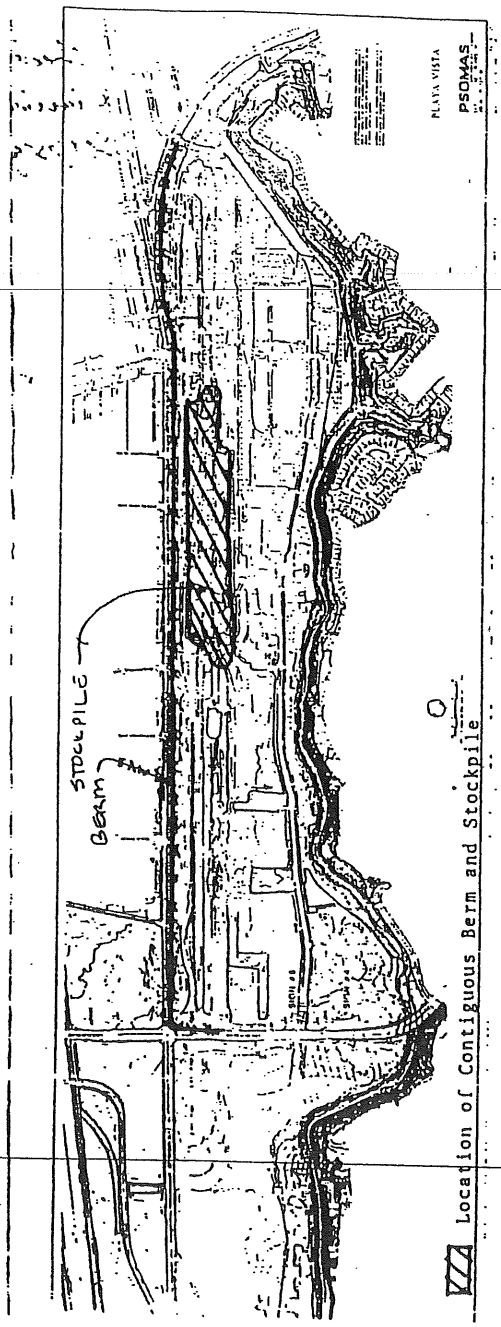
Initiating Office: METRO

Over the Counter Permit

PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:05

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



COUNCIL DISTRICT: 6

PLOT PLAN ATTACHMENT

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 9135
Mtg	DISTRIBUTION
	☑ Owner ☐ ..... Pl Ck.
	☑ Petitioner ☑ ..... Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Avenue | LOT(S) 2 and 3 | BLK | TRACT 12672

Owner Playa Capital Company, LLC

Address 12555 W. Jefferson Blvd #300

Los Angeles, CA Zip 90066

1 Daytime Phone (310) 8220074

Petitioner Psomas

Address 1444 W. Olympic Blvd #750

W. Los Angeles, CA Zip 90064

Daytime Phone (310) 954-3700 x MOE

District Office W. L.A. | Type | Plan Ck No. | Stories | Zone | Occ. | Permit No. 98LA78695 | No. Units | Job Order No. | F. D. | Bureau/Division Building | D. M. 105 B165 | Use of Bldg. Mfg | C. D. 60 | Job Status

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary Stockpile & Berm for Screen / Erosion Control, (100,000 + 60,000 = 160000 C.Y Per Grading Permit 98LA78695 and Modification # 8247).

Dept. Comment Extension of Time

Code Sections: L.A.M.C. – 91.7011.3

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24 –

Since Grading work for all area of Project is not finished, existing Stockpile Berm (Screen / erosion control berm) will be required to remain in place.

Petitioner's Signature [signature] Position For Psomas Date 9/24/2001

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ~~☐ Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request ~~(IS) (IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Steve Cabrera
Department Action By

9/26/01
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.

2. Extension of time for one year (Sept 30, 2002)

Board of Building and Safety
LA 28 041097 09/26/01 04:06PM
BOARD APPLIC FEE $100.00
Total Due $100.00
(Cashier Use Only)
NO FEE NO FEE NO FEE
No. of Items
Fee due $100.00
Fee verified

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (LA 6 COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Permit Application #: 98030 - 10000 - 0191

Grading

City of Los Angeles - Department of Building and Safety

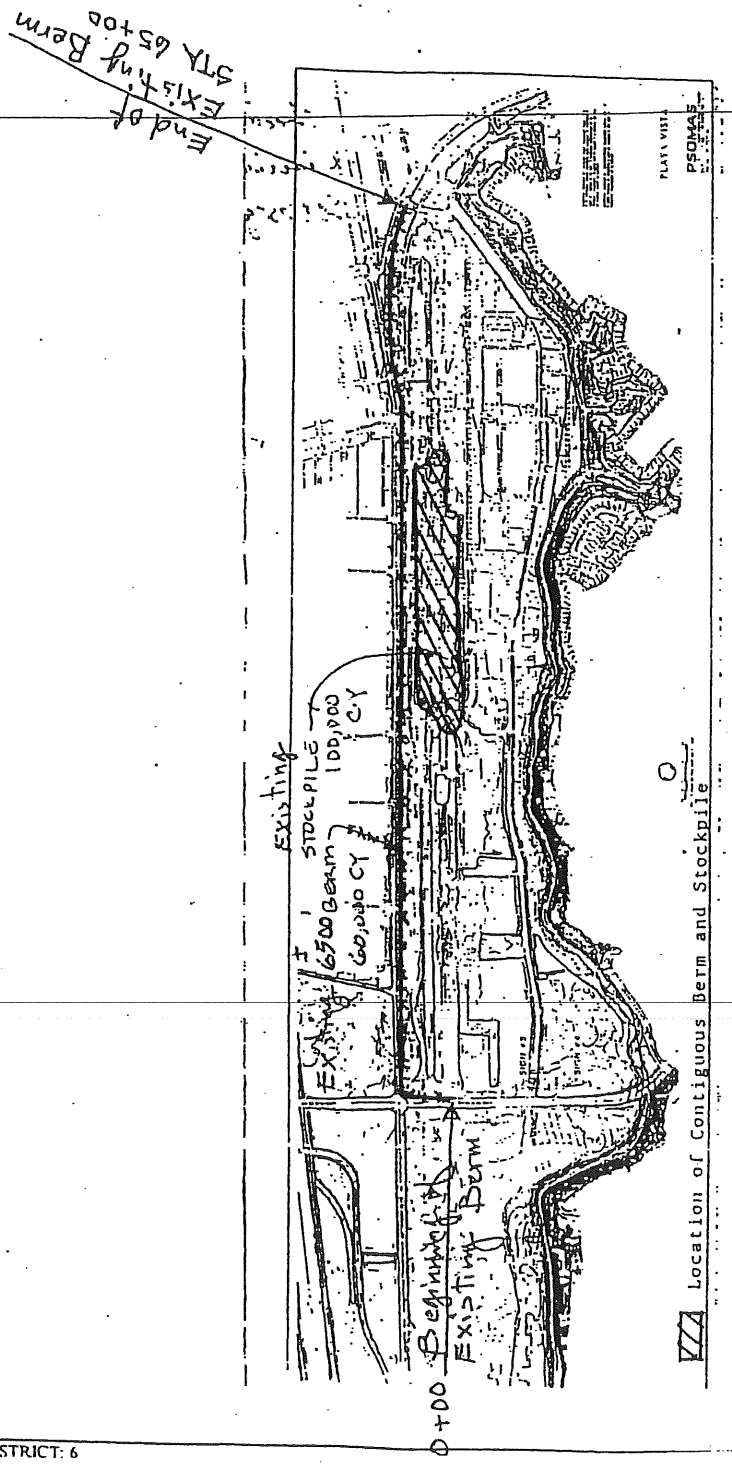
Plan Check #:

Initiating Office: METRO

Over the Counter Permit

PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:05



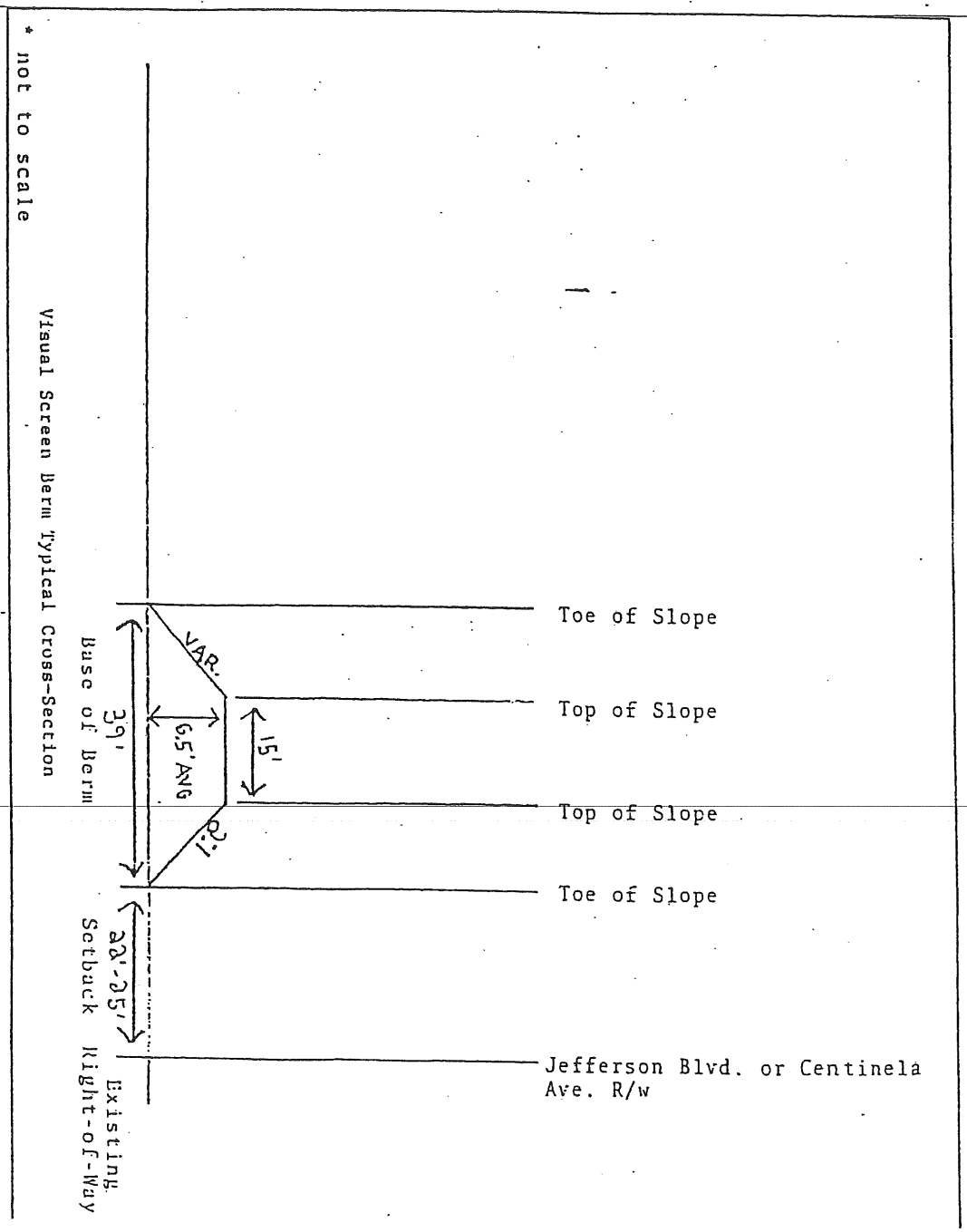
(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)

COUNCIL DISTRICT: 6

PSOMAS

☒ Santa Monica 310/450-1217
☐ Costa Mesa 714/751-7373
☐ Riverside 909/787-8421
☐ Sacramento 916/929-7100

Job No. IPCC0201-35 Sheet 1 of 1
Project Name PLAYA VISTA
Prepared By _____ Date _____
Reviewed By _____ Date _____
Revised By _____ Date _____



Area D

☑ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

(2)

FILE NO. 10090

DISTRIBUTION

☒ Owner ☐ ..... Pl Ck.
☒ Petitioner ☐ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2 & 3 BLK

TRACT 12672

1

Owner Playa Capital Company, LLC
Address 12555 W. Jefferson Blvd #300
Los Angeles CA Zip 90066
Daytime Phone (310) 822 0074

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
Los Angeles CA Zip 90064
Daytime Phone (310) 954 3700 Moe

District Office W. LA
Plan Ck No. 98LA78695
Zone
Permit No.
Job Order No.
Bureau/Division B.S.
Use of Bldg. Erosion Control
Job Status

Type
Stories
Occ.
No. Units
F.D.
D.M. 105 B165
C.D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of Time to allow Temporary Existing Stockpile & Berm for Screen / Erosion Control, 160,000 CY Per Grading Permit 98LA78695 and Approved modifications #8247 & #9135

Dept. Comment Extension of Time

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Since Grading work for all areas of Project is not finished. Existing Stockpiles & Berm will be required for Screen / Erosion Control Purposes.

Petitioner's Signature [signature] Position For Psomas Date 9.19.02

Reviewed By [signature] Date 9/29/02

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... [signature]
(EQUIVALENCY) (EQUIVALENT FACILITATION)

10/3/02

Department of Building and Safety

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No Grading work is included in this approval
2. Extension of time for one year (Sept 26, 2003)

BOARD APPLIC FEE $100.
Total Due: $100.
No Fee: $100.
NO FEE NO FEE NO FEE
Name: PLAYA CAPITAL CO.
Addr: 6775 CENTINELA AVE.
Auth: PM OF NO 9470A
Dept: PLAYA VISTA
Fee due 100.00
Fee verified [initials]

(Cashier Use Only)

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....

G

CITY OF LOS ANGELES - DEPARTMENT OF BUILDING AND SAFETY

APPLICATION FOR GRADING PERMIT AND FOR GRADING CERTIFICATE

** PLEASE TYPE OR PRINT IN INK CLEARLY **

YB 7-24-95

JOB ADDRESS: 13250 Jefferson Boulevard	SUITE/UNIT NO.	CROSS STREETS: Lincoln Boulevard & Jefferson Blvd	
TRACT: [illegible]	BLOCK	LOT(S): Rancho Sue Maguire	ARB. UNIT
PLOT: orner	ZONE: C2)PV)	ALLEY: —	BUILDING LINE: —
SEISMIC STUDY ZONE		ASSESSOR'S ID: 4211 012 005	COUNTY REF.: MR 3-204/209
acreage (inc legal)	FIRE DISTRICT: II	GRADING: —	HIGHWAY DED.
FLOOD ZONE		DIST. MAP: 102B157	CENSUS TRACT: 2753.12
AFFIDAVITS, EASEMENTS AND RESTRICTIONS: Z1 1874, Z1 1370, Z1 1222, Z1 1117 AHA CZCA (OK PER SEA FAN)		DIST. OFFICE: ☐ METRO ☐ VAN NUYS ☒ W.L.A. ☐ WILSHIRE ☐ SAN PEDRO ☐ W. VALLEY	COUNCIL DIST.: 6

B

BLDG. OWNER: Maguire Thomas Partners — PHONE: (310)622-0074	APPLICANT: Psomas & Associates — PHONE: (310)450-1217
ADDRESS: 13250 Jefferson Boulevard — SUITE/UNIT NO.	ADDRESS: 3420 Ocean Park Boulevard — SUITE/UNIT NO.
CITY/STATE/ZIP: Los Angeles, CA 90049	CITY/STATE/ZIP: Santa Monica, CA 90405
CIVIL ENGINEER NAME: Psomas & Associates — ADDRESS: 3420 Ocean Park Blvd. Santa Monica, CA 90405 — ACTIVE STATE LIC. NO. — CITY BUS. LIC NO. — PHONE NO.: (310)450-1217	
ENGR. GEOLOGIST: Law/Crandall, Inc.	(213)889-5300
SOIL ENGINEER: Law/Crandall, Inc.	(213)889-5300
GEN. CONTR.	( )
DESCRIPTION OF GRADING WORK	

C

PURPOSE OF GRADING: STOCKPILE / 90% Compaction required.

CUBIC YARDS: P.C. 51 — CUT: G.P. — FILL: 150,800 — EXPORT: — — IMPORT: — — MAX SLOPE: CUT — FILL — EXPORT — IMPORT

CAL. ENVIRONMENTAL QUALITY ACT: ☒ EXEMPT ☐ COMPLETE — RETAINING WALL REQ'D: ☐ YES ☐ NO — HEIGHT — BOND: ☐ CASH ☐ SURETY — AMOUNT — CAB — DATE POSTED

LIST ALL APPLICABLE REPORTS, DEPT. LETTERS AND RESPECTIVE DATES

2 IMPORT. THRU PUBLIC STREETS UNLESS Haul Route is obtained
STOCKPILE MODIFICATION GRANTED BY SEA FAN #1688
for above yardage.

PLAN CHECK NOTES/SUPERINTENDANT LETTER AND AFFIDAVITS

D

P.C. NO.: CC	EVENT CODE	SUPPLEMENT TO PERMIT NO.
HILLSIDE POSTING	ZONING VERIFIED BY: [illegible] — DATE: 7/27/95	BOARD FILE NO.
PRE-INSPECTION	GRADING PRE-INSPECTION BY — DATE	PLAN CHECKED BY — DATE
OAK TREE INSP.	APPLICATION [illegible]	BSID: 0604
PLAN CHECK: 93.50	PRINT: [illegible]	[illegible]
SUPP. PLAN CHECK	SIGN: [illegible]	DATE: 7/27/95
PLAN MAINT.	FOR DEPT. USE ONLY	
GRADING PERMIT: 5200.00		
SURCHARGES: 7.29		
CHARGES		
ADD'L INSPECTION		

PLOT PLAN ATTACHED ☒ YES ☐ NO

FOR CASHIER'S USE ONLY

07/27/95 04:04:35PM [illegible]
GRADING PLAN [illegible]
GRADING PERMIT [illegible]
INVOICE [illegible]
BYS DEV [illegible]
ONE STOP [illegible]
MISCELLANEOUS [illegible]
CITY PLAN SURC [illegible]
TOTAL [illegible]
CHECK [illegible]

95VN 88145

Unless a shorter period of time has been established by an official action, plan check approval expires one and a half years after the fee has been paid. This permit expires two years after the fee has been paid or 180 days after the fee has been paid and construction has not commenced; or if work is suspended, discontinued or abandoned for a continuous period of 180 days (Sec. 98.0603 L.A.M.C.). Claims for refund of fees paid on permits must be filed within one year from the date of expiration for building permits granted by the Department of Building and Safety (Sec. 22.12 & 22.13 L.A.M.C.).

B & S 03-B-G Rev. 1/95

DEPARTMENT OF BUILDING AND SAFETY

INSPECTION RECORD

CITY OF LOS ANGELES

Do Not Call for Framing Inspection Until Electrical, Plumbing & Heating Approvals have been Obtained.

Inspections	Date	Inspector
Rough Electrical		
Rough Plumbing		
Rough Heating & Refrig.		
Rough Disabled Access		
Rough Framing		
Rough Fire Sprinklers		
Insulation		
OK to Cover		
DO NOT COVER UNTIL ABOVE IS SIGNED		
Exterior Lathing		
Interior Lathing		
OK to Plaster		
DO NOT PLASTER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE BUILDING		
Sewer		
Gas		
Heating & Refrigeration		
[illegible]rical [illegible]rground		
FINAL INSPECTIONS		
Final Electrical		
Final Gas		
Final Plumbing		
Final Heating & Refrigeration		
Final Fire Sprinklers		
Final L.A.F.D. OK Title 19 Jobs Only		
Final Disabled Access		
Final Grading		
Final		

ADDRESS OF JOB

NATURE OF WORK

BLDG. PERMIT NO. 95VN 86145
07/27/95 04:04:3
VN01 T-3119 C 06

OWNER

Inspections	Date	Inspector
GRADING INSPECTIONS		
Initial Grading		
Toe or Bottom		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNEI		
Excavation		
Fill		
Drainage Devices		
Rough Grading		
BUILDING AND MECHANICAL INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
DO NOT PLACE CONCRETE UNTIL ABOVE IS SIGNED		
Heating & Refrig. Groundwork		
Electrical Groundwork		
Plumbing Groundwork		
Gas Piping Groundwork		
OK to Place Slab Floor		
DO NOT PLACE CONCRETE SLAB FLOOR UNTIL ABOVE IS SIGNED		

INSPECTION PHONE LIST

BUREAU OF COMMUNITY SAFETY

1 and 2 Family Dwellings; Complaints & Referrals on Existing Multi Residential, Commercial and Industrial.

See separate listing of satellite offices and telephone numbers available at Building & Safety offices.

BUILDING INSPECTION
3 or More Dwelling Units, Commercial, Industrial

	Inspection Request Lines (24 Hours)	Information (7:30 A.M. to 5:00 P.M.) and Inspectors (7:30 to 8:30 A.M. only)
Downtown Office	(213) 485-2022	(213) 485-2365
Van Nuys Office	(818) 989-8589	(818) 989-8207
West L.A. Office	(310) 575-8063	(310) 575-8200
San Pedro Office	(310) 548-7556	(310) 548-7557

Disabled Access Information ..... (213) 346-7724

Grading Inspections

Inspection request Lines

Downtown Office (8 A.M. to 5 P.M.) ..... (213) 485-3435
Van Nuys Office (8 A.M. to 5 P.M.) ..... (818) 989-8211
West L.A. Office (24 Hours) ..... (310) 575-8063
San Pedro Office (24 Hours) ..... (310) 548-7556

The 24-Hour answering service in the Downtown, Van Nuys, West L.A. and San Pedro Offices is a recording device. When requesting inspection, the following information is required: (1) Job Address (2) Type of Inspection (3) Use of Building and (4) Permit Number. Calls received before 2:00 p.m. will be made the following day. However, if inspection is not made, it will be necessary to recall for the inspection.

For **Mechanical Inspections** on Residential Buildings of over 3 units, and on Commercial and Industrial Buildings, call the Mechanical Division numbers in the appropriate office: (As Listed Below)

LA (213) 485-2071 VN (818) 989-8585
WLA (310) 575-8063 SP (310) 548-7556

INSPECTION SERVICES WILL NOT BE PROVIDED WHEN THERE IS AN UNLEASHED DOG ON THE PREMISES.

DEPARTMENT OF BUILDING AND SAFETY

INSPECTION RECORD

CITY OF LOS ANGELES

Do Not Call for Framing Inspection Until Electrical, Plumbing & Heating Approvals have been Obtained.

Inspections	Date	Inspector
Rough Electrical		
Rough Plumbing		
Rough Heating & Refrig.		
Rough Disabled Access		
Rough Framing		
Rough Fire Sprinklers		
Insulation		

ADDRESS OF JOB

NATURE OF WORK

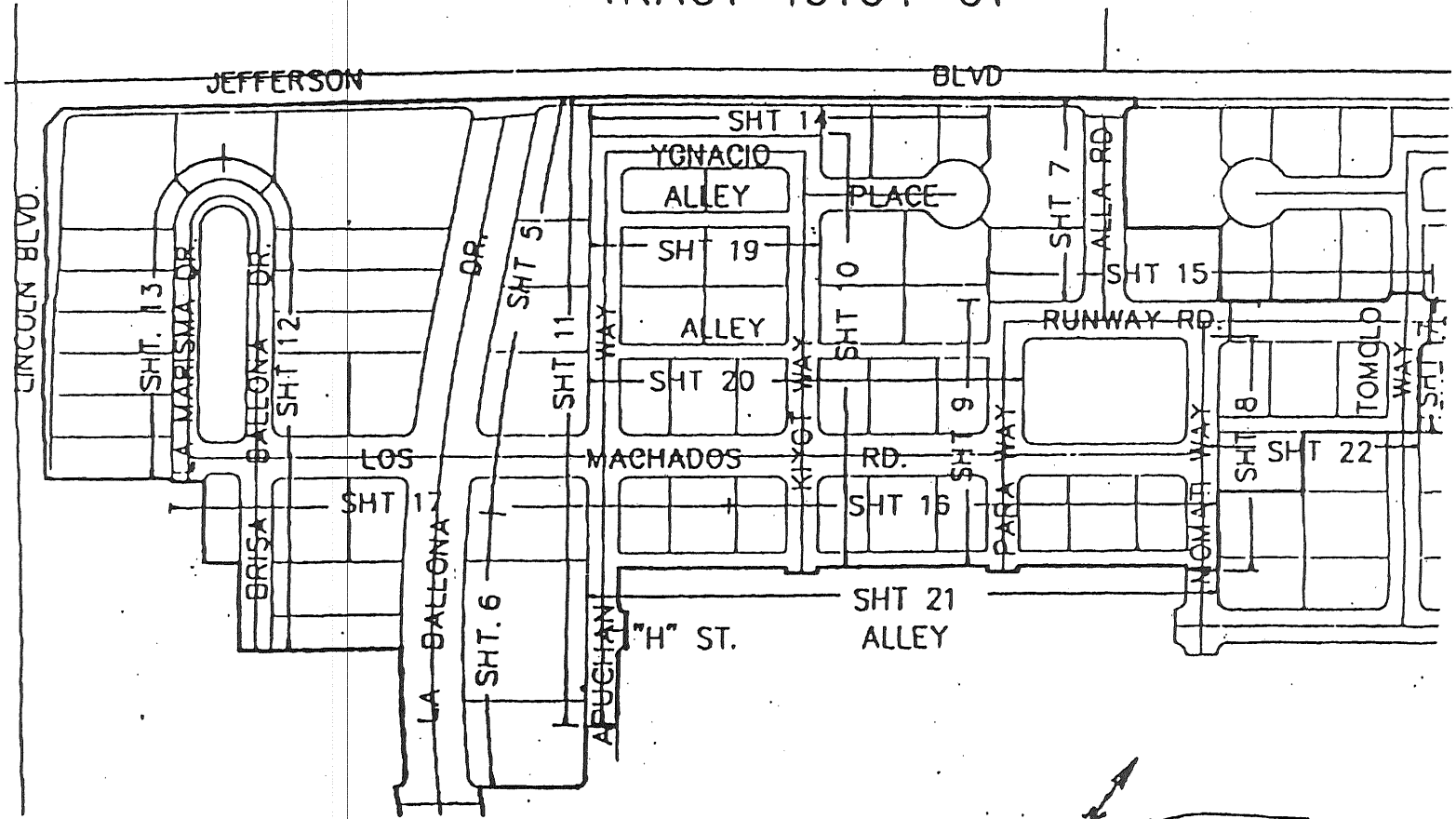
BLDG. PERMIT NO. 95VN 86145
07/27/95 04:04:3
VND1 T-3119 C 06

OWNER

Inspections	Date	Inspector

GRADING INSPECTIONS

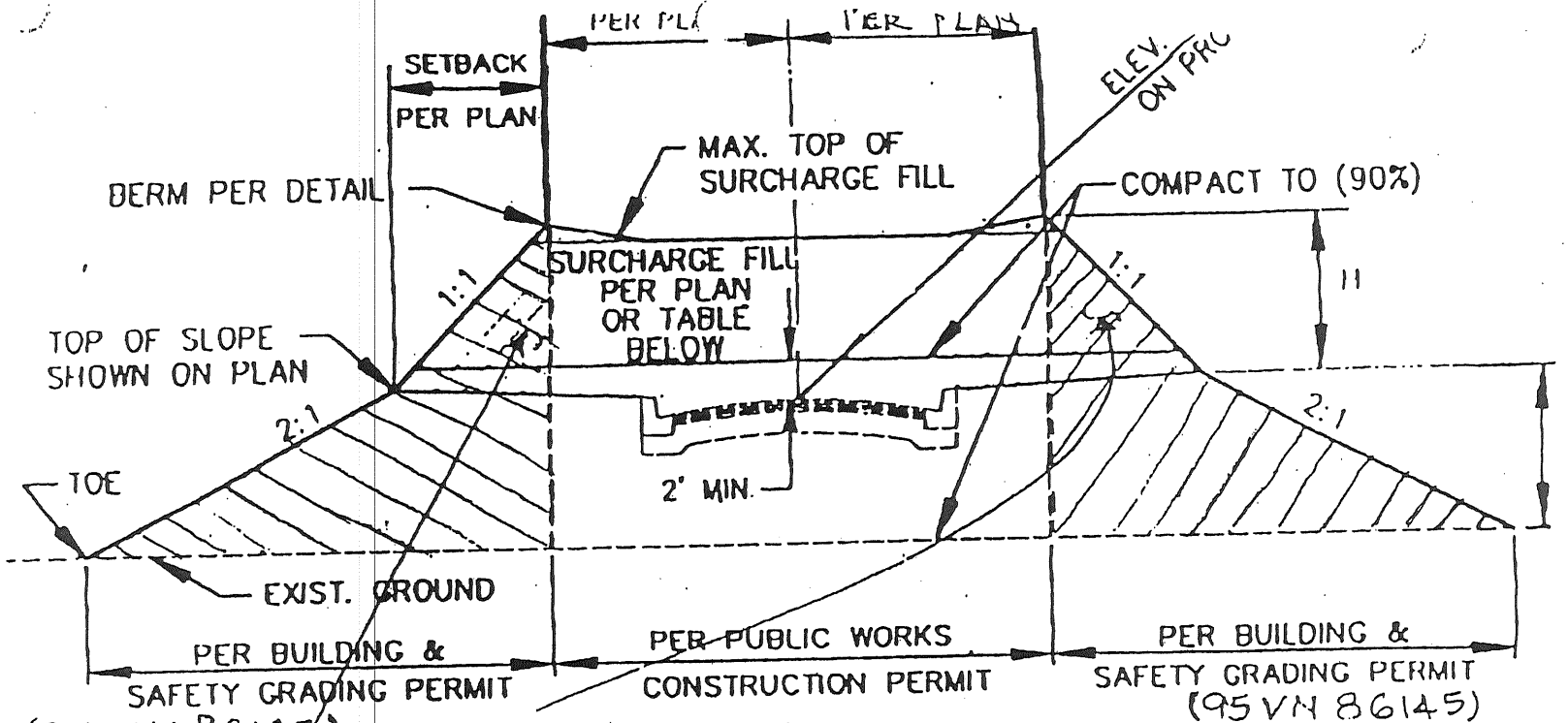
TRACT 49104-01



KEY MAP

SCALE: 1" = 300'

SK-2



TYPICAL STREET & SURCHARGE SECTION

NOT TO SCALE

stockpile for lapunet #2

SURCHARGE FILL TO BE PLACED PER THIS PLAN. SEE PLAN SHEETS FOR MAXIMUM HEIGHT OF SURCHARGE "H". MAXIMUM SURCHARGE FILL HEIGHT EQUALS DEPTH OF COMPACTED FILL AT FINISH SURFACE GRADE. ACTUAL SURCHARGE HEIGHT VARIES WITH THE LENGTH OF TIME THE SURCHARGE IS ALLOWED TO SETTLE. SEE TABLE BELOW.

SC-3

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 1588
	DISTRIBUTION
	☑ Owner ☐ ..... Pl Ck.
	☑ Petitioner ☑ WLA Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS 13250 Jefferson Blvd

LOT(S) PT OF RAMONA BLKS DEMACHO

TRACT Rancho LA BALLONA

Owner Maguire Thomas

Address 13250 Jefferson Blvd

Los Angeles CA Zip 90094

1 Daytime Phone (310) 822-0074

Petitioner P. Thomas & Associates

Address 5A20 Ocean Park Blvd

Santa Monica CA Zip 90405

Daytime Phone (310) 452-1247 Ext. 272

District Office W.L.A. Type .....
Plan Ck No. BB. 9789 Stories .....
Zone C2-(CPV) Occ. .....
Permit No. ..... No. Units .....
Job Order No. ..... F.D. II
Bureau/Division Grading D.M. 132B157
Use of Bldg. ..... C.D. 6
Job Status Proposed

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

1) To allow the temporary stockpile of 150,000 cu. yds. as shown on the attached sketch. (Top of 100,000 cu. yds. will be from Loyola Site)

2) To allow the temporary stockpile of additional soil to be used for future streets & settlement as shown on sketch SK-2 & SK-3

Dept. Comment No-Kiosk Permits

Code Sections: L.A.M.C.— Title 24—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Provide the required dirt for future roads & lots pending Grading Plans and Soils Engineer

Petitioner's Signature X ..... Position P.E. Date 6.15.95.

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ **Granted (See attached letter).** ☐ **Denied (See reverse for appeal information.)**

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

Date 6/15/95

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1) Comply with conditions stipulated on the attached sheet

6/15/95 02:
BOARD APPEAL
TOTAL
CHECK
(Cashier Use Only)

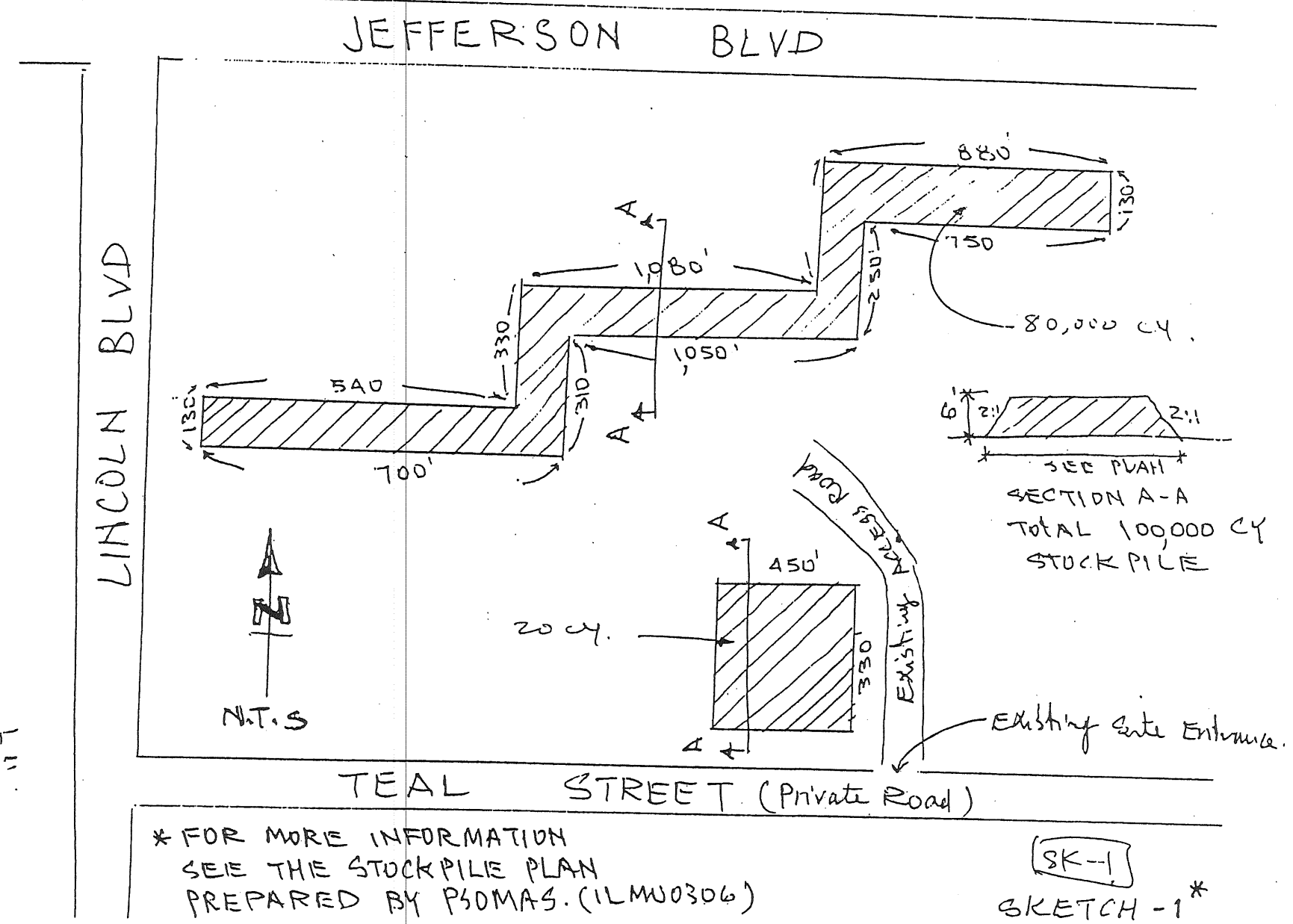
No. of Items .....
Fee due .....
Fee verified .....

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....



* FOR MORE INFORMATION
SEE THE STOCKPILE PLAN
PREPARED BY PSOMAS. (ILM00306)

SK-1

SKETCH - 1*

[redacted]WED
COSTS
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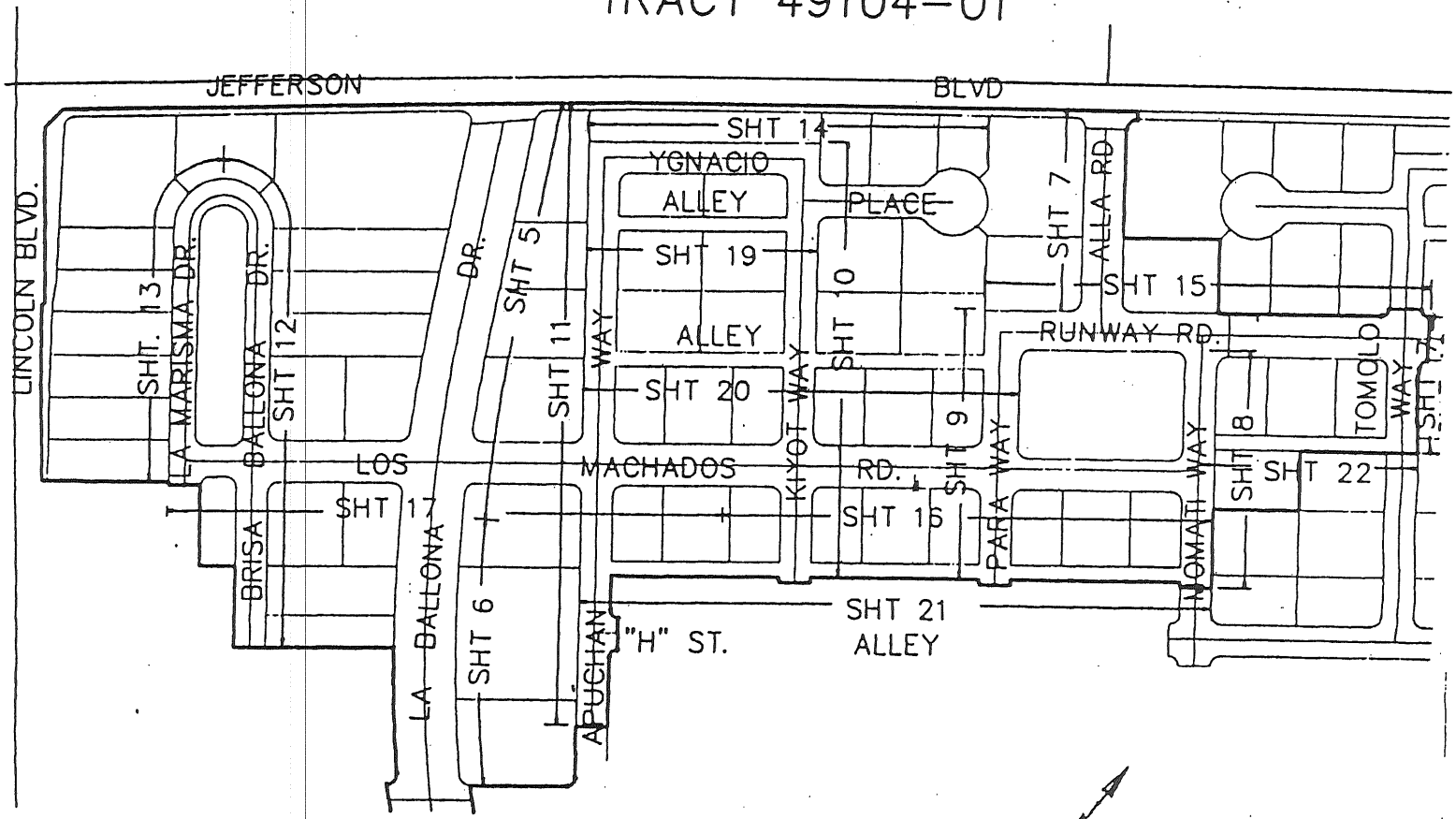
OR
NOT
NOTIFY THE

PLY.
ON OF ANY
WORKER
FAILURE BY

LEPHONE
PPP. THE
EVEN DAYS
RMWATER
TIVE
EPHONE
ABLE TO

TRACT 49104-01



KEY MAP

SCALE: 1" = 300'

SK-2

TE OF THE

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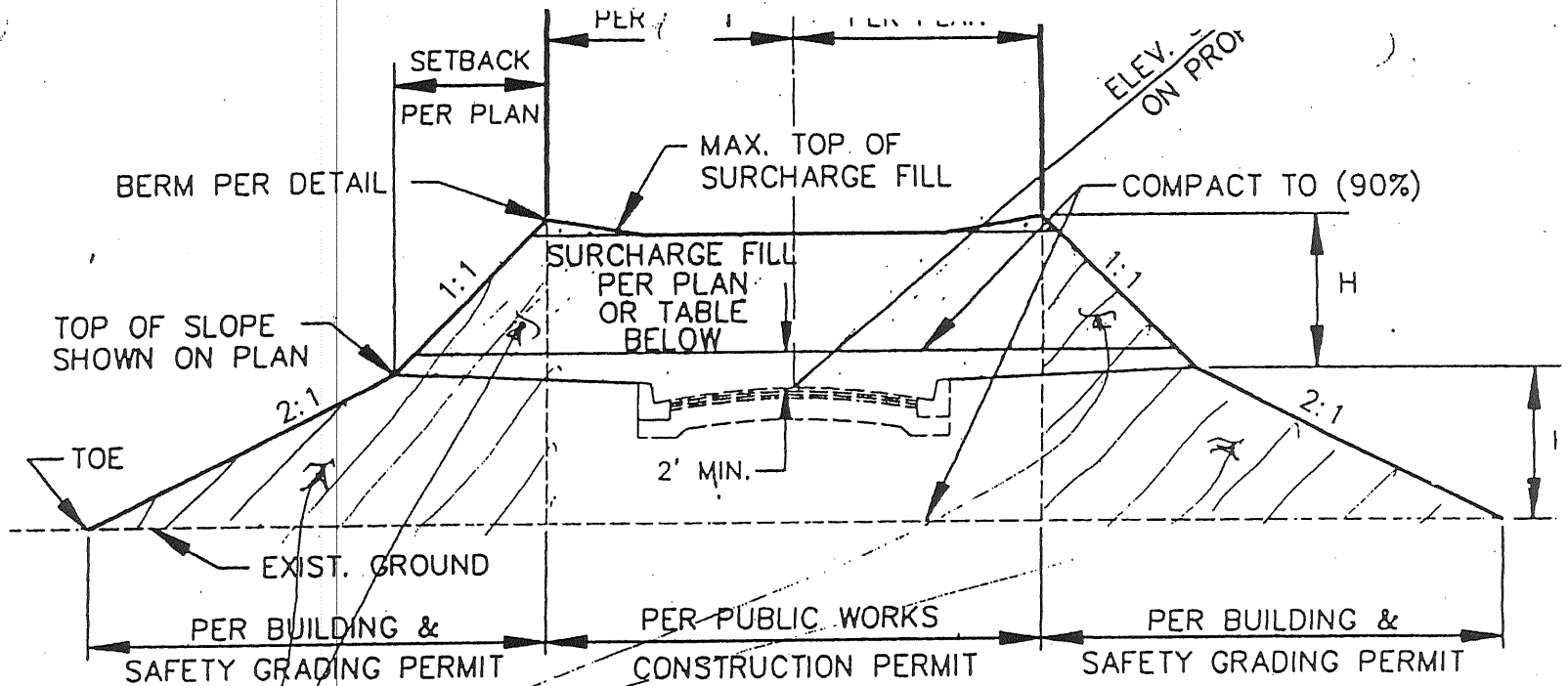
ITIES.

NDATIONS OF



TYPICAL SURCHARGE SECTION

NOT TO SCALE

DATE _____

stockpile for request #2

ENDATIONS OF

SURCHARGE FILL TO BE PLACED PER THIS PLAN. SEE PLAN SHEETS FOR MAXIMUM HEIGHT OF SURCHARGE "H". MAXIMUM SURCHARGE FILL HEIGHT EQUALS DEPTH OF COMPACTED FILL AT FINISH SURFACE GRADE. ACTUAL SURCHARGE HEIGHT VARIES WITH THE LENGTH OF TIME THE SURCHARGE IS ALLOWED TO SETTLE. SEE TABLE BELOW.

DATE _____

LINCOLN AND JEFFERSON BOULEVARD
LOS ANGELES, CALIFORNIA

SC-3

SURCHARGE FILLS (FILL THICKNESS IN ADDITION TO DESIGN HEIGHT

JCB ADDRESS: 13250 JEFFERSON BLVD MOD. NO.: 1688

CONDITIONS OF APPROVAL FOR TEMPORARY STOCKPILE

1. Two * temporary stockpile permits shall be obtained. * See below.
2. The fill surface shall be surface-rolled to control dust.
3. Erosion control measures shall be provided to the satisfaction of the district grading inspector and Public Works during the rainy season, and shall be constructed/placed to inhibit the transportation of any loose material into the public storm drain system.
4. The fill shall be located a minimum of 50 ft. from the property lines, shall not exceed 8 ft. in height, and shall have slopes no steeper than (two) ~~(three)~~ to one. for request #1 & 1=1 for request #
5. This approval shall be limited to (one year) ~~(six months)~~. All stockpile fill, loose fill, and debris shall be removed from the site at the end of the approved time period.
6. Plans for the temporary stockpile site shall be submitted to and approved by the Grading Division prior to obtaining a stockpile permit.
7. Public street shall not be utilized for the import of dirt onto this site.

* One stockpile permit shall be issued for 100,000 cu. yard of dirt as shown and located on the attached sketch SK-1 the other stockpile permit shall be taken out concurrently with the site grading permit; this stockpile permit is for placing dirt on both sides of future roads for the purpose of alleviating future road settlement. See SK-2.

City of Los Angeles — Department of Building and Safety

☒ **REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)**

☐ **REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)**

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. Z690

DISTRIBUTION

☒ Owner ☐ ..... Plck.
☒ Petitioner ☒ West L.A. Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 13250 Jefferson Blvd.

LOT(S) PT. OF RAMONA & S. DEMACH
TRACT Rancho La Ballona (MR3-204)

1

Owner Maguire Thomas Partners
Address 13250 Jefferson Blvd.,
Los Angeles CA Zip 90094
Daytime Phone (310) 822-0074

Petitioner Psomas and Associates
Address 3420 Ocean Park Blvd, #1040
Santa Monica, CA Zip 90405
Daytime Phone (310) 450-1217

District Office West L.A. Type .....
Plan Ck No. BB9789 Stories .....
Zone C2-(PV) Occ. .....
Permit No. 95LA38748 No. Units .....
Job Order No. 95VN86145 F.D. II
Bureau/Division Grading D.M. 102B157
Use of Bldg. STOCK PILE C.D. 6
Job Status Proposed

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 **REQUEST:** Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

1. Time extension until 6/15/97 to allow temporary stockpile of 100,000 CY of dirt onsite as shown on the attached sketch "SK-1" (20,000 of 100,000 CY will be from Loyola site) per G Permit No. 95LA38748 and Administrative Modification No. 1688 dated 6/15/95.
2. Time extension until 6/15/97 to allow the temporary stockpile of dirt on both sides of future onsite streets as shown on sketches "SK-2" & "SK-3", per G. Permit No. 95VN86145 and Administrative Modification No. 1688 dated 6/15/95.

Dept. Comment TEMPORARY STOCKPILE

3 **JUSTIFICATION/FINDINGS OF EQUIVALENCY:**

Code Sections: L.A.M.C.- 91.7006
Title 24—

On-site street improvement and grading plans for Tract 49104-01 of Playa Vista project are in review by City of Los Angeles (P.W. and G.D.).

Petitioner's Signature Consultant for Psomas & Associates Position P.E. Date 6-13-96

Reviewed By [illegible] Date 6-13-96

DEPARTMENT ACTION: In accordance with ☒ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter) ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 6-13-96

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1) All stockpiled dirt shall be removed offsite on or prior to 6/15/97.

06/13/96 09:15:45AM LA05 T-3971 C 29
BOARD APPLIC F 105.00
TOTAL 105.00
CHECK 105.00

(Cashier Use Only)

No. of Items 2
Fee due $75 + $30 = $105
Fee verified [signature]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

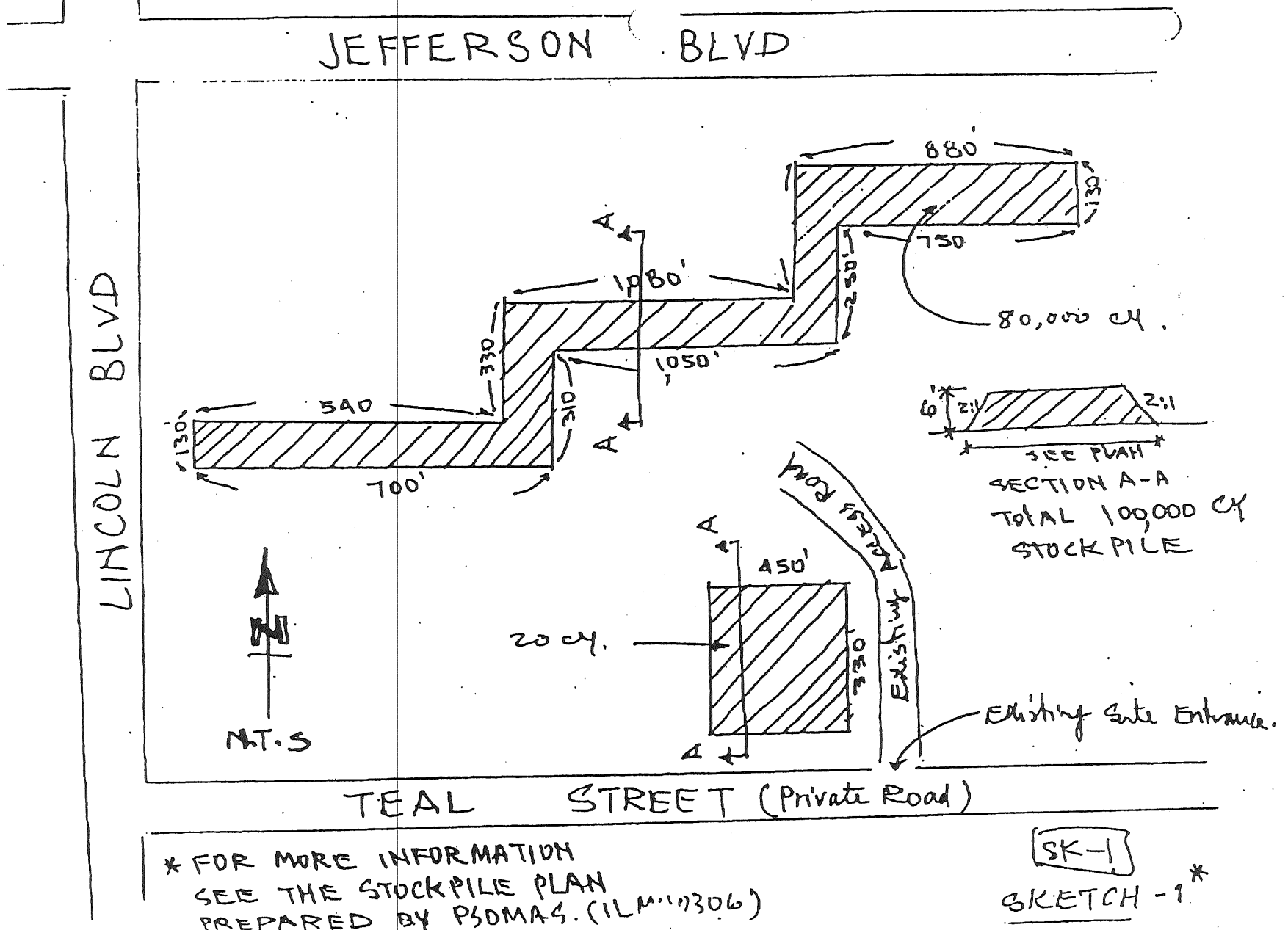
(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)



* FOR MORE INFORMATION SEE THE STOCKPILE PLAN PREPARED BY PSOMAS. (ILM-11306)

SK-1

SKETCH - 1*

(2) Time extension

City of Los Angeles — Department of Building and Safety

- ☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (96.0403 L.A.M.C.)
- ☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)
- ☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY | FILE NO. 2670

DISTRIBUTION: ☑ Owner ☐ ☒ Petitioner ☒ WLA ☐ Fire. ☐ ☐ Health ☐ — Pl Ck, Insp, Bur

JOB ADDRESS 13250 Jefferson Boulevard

LOT(S) Pt. of Ramona S Demacho | BLK

TRACT Rancho La Ballona

1

Owner ... Maguire Thomas Partners
Address .. 13250 Jefferson Blvd.,
.. Los Angeles, CA Zip 90094
Daytime Phone (310) 822-0074

Petitioner ... Psomas and Associates
Address ..... 3420 Ocean Park Blvd., $1040
..... Santa Monica, CA Zip 90405
Daytime Phone (310) 450-1217

District Office West LA — Type
Plan Ck No. — Stories
Zone — Occ.
Permit No. — No. Units
Job Order No. — F. D.
Bureau/Division Engrg/Pc — D. M.
Use of Bldg. — C. D.
Job Status Pending

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extend modification No. 1688 dated 6/15/95 until 6/15/97. The extension will be under the original modification conditions.

Dept. Comment Temporary Stockpile.

Code Sections: L.A.M.C. – 91.7006

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24 –

The allowed allocated dirt quantity of 100,000 CY has not been imported in full yet.

Petitioner's Signature ... Position Psomas V.P. Date 6/13/96

Reviewed By ... Date 6/13/9

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☑ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) ( ) Dept. is required.
☑ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By — Date 6/13/96

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1) All stockpiled dirt under mod. 1688 shall be removed offsite on or prior to 6/15/97

(Cashier Use Only)

No. of Items 1
Fee due $75
Fee verified SM

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ... Position ... Date ...

Print Name ...

08/25/98 TUE 17:04 FAX 310 306 2194 PLAYAVISTA 003

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 3853

DISTRIBUTION

☑ Owner ☒ WLA Pl Ck.
☑ Petitioner ☒ ~~WLA~~ Geo Insp.
☐ Fire ☑ INSP Bur.
☐ Health ☑ DAFS

JOB ADDRESS 13250 Jefferson Blvd

LOT(S) PT. OF RAMONA BLK S. DEMACHI
TRACT RANCHO LA BALLONA (MR3-2

1

Owner Maguire Thomas Partners
Address 13250 Jefferson Blvd
Los Angeles CA Zip 90094
Daytime Phone (310) 822-0074

Petitioner Psomas and Associates
Address 3420 Ocean Park Blvd #1040
Santa Monica CA Zip 90405
Daytime Phone (310) 450-1217

District Office WLA
Plan Ck No.
Zone C2 (PV)
Permit No. 95LA38748
Job Order No. 95VN86145
Bureau/Division
Use of Bldg. Stock Pile
Job Status in Progress

Type
Stories
Occ.
No. Units
F.D. ☒
D.M. 102B157
C.D. 6

☐ YARD NOTICE (COM-78) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

~~[illegible]~~ to allow temporary stock pile of 750,000 CY of dirt (in lieu of 100,000 CY) per "G" permit NO. 95LA38748 and "G" permit NO. 95VN86145 and administrative modification NO 1688 dated 6/15/95 and 2640 dated 6/13/96.

Dept. Comment TEMP STOCKPILE

Code Sections: L.A.M.C.— 91.7006

Title 24—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

On site street improvements and grading plans for Tract 49104 of Playa Vista project are in review by City of L.A.

Petitioner's Signature Moe Lahoch / Consultant for Psomas Position P.I.E. Date 9.5.97

Reviewed By [signature] Date 9/5/97

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☑ Sect. 19957 H. & S.C.

The Request is ☐ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) ( ) Dept. is required.
☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 9/5/97

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

A NEW PERMIT SHALL BE OBTAINED FOR THE TOTAL AMOUNT OF YARDAGE TO BE STOCKPILED

THIS APPROVAL IS VALID UNTIL 9/5/98

05/97 [illegible] WL01 1-6625 [illegible]
BOARD APPLIC F 100.0
TOTAL 100.00
CHECK 100.00

(Cashier Use Only)

No. of Items 1
Fee due 100—
Fee verified [initials]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing. REVISION 5/93

DISTRIBUTION
☒ Owner ☒ 4087
☒ Petitioner ☒ WLA. GRD
☐ Fire ☒ INSP
☐ Health ☒ DAFS

ADDRESS 13250 Jefferson Blvd

LOT(S)

TRACT Rancho La Ballona (MRS-2

BLKS. DEMA

Owner Playa Capital Company, LLC
Address 13250 Jefferson Blvd
Los Angeles CA Zip 90094
Daytime Phone (310) 822 0074

1

Petitioner Psomas & Associates
Address 3420 Ocean Park Blvd
Santa Monica, CA Zip 90405
Daytime Phone (310) 450 1217

District Office WLA
Plan Ck No. BB 9784
Zone C2 (BV)
Permit No. 95 LA 38768
Job Order No. 95VN86145
Bureau/Division Grading
Use of Bldg. Stock Pile - Stand
Job Status

Type
Stories
Occ.
No. Units
F.D. #
D.M. 102.B1
C.D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETIT
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLE BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

TO ALLOW AN EXTENSION OF TIME UNTIL 12/27/98 IN WHICH TO ~~[illegible]~~ START ~~BUILDING PERMIT FOR PLANS FILED FOR CHECKING ON~~ WORK UNDER PERMIT NO. 95 VN 8614, ISSUED ON 7-27-95.

Dept. Comment: EXTENSION OF TIME TO OBTAIN PERMIT

Code Sections: L.A.M.C. — 98.0603, 9

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24 —

WORK STOPPED PER OWNER'S REQUEST.
And we are not using Loyola University site for Dirt supply.

Petitioner's Signature [signature] Position M. Lahooti Consultant For Psomas And Associate P.E. Date 11-3-98

Reviewed By [signature] 1-13-9 Date

DEPARTMENT ACTION: In accordance with ☒ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) ~~XXXXXX~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES), (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION)

[signature] 1.13.98
Department Action By Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. THIS EXTENSION APPROVAL IS CONTINGENT UPON THE OWNER SUBMITTING ALL PLANS FOR THE PROPOSED WORK TO THE DEPARTMENT FOR RECHECKING TO VERIFY COMPLIANCE WITH CURRENT CODE REQUIREMENTS PRIOR TO THE OBTAINING OF A BUILDING PERMIT. THE DEPARTMENT MAY COLLECT A FEE TO RECOVER THE COSTS OF THE RECHECKING.
2. SITE NOT IN Grading Hillside area public streets may be used.

(SEE OVER)

(Cashier Use Only)

No. of Items ONE TWO
Fee due ~~$20~~ 100 ~~$15~~
Fee verified [signature]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name

GRADING NOTES:

1. GRADING SHALL CONFORM TO DEPARTMENT OF BUILDING AND SAFETY GENERAL SPECIFICATIONS FOR GRADING PLANS, FORM 8-164, WHICH SHALL BE CONSIDERED A PART OF THESE PLANS.
2. THE BUILDING AND SAFETY LETTER DATED December 19, 1994 AND REFERENCED REPORTS ARE A PART OF THESE PLANS.

   ALL RECOMMENDATIONS OF THE HEREIN MENTIONED SOILS REPORT AND ADDENDUMS SHALL BE MADE A PART OF THESE PLANS. SEE SHEET HEREON FOR SOIL REPORT REFERENCE.

   AS GRADING PLAN, WHEN APPROVED BY THE DISTRICT ENGINEER, AS WELL AS PERMITS FOR WORK WITHIN STATE OR COUNTY RIGHTS-OF-WAY, SHALL BE ON THE WORK SITE AT ALL TIMES.
5. MATERIAL IN, OR ADJACENT TO, AREAS UNDER THE JURISDICTION OF THE BOARD OF PUBLIC WORKS, WHICH, IN A NATURAL POSITION, IS UNSTABLE AND CONSTITUTES A POTENTIAL SLIDE, SHALL BE BROUGHT TO THE ATTENTION OF THE DISTRICT ENGINEER.
6. ALL STREETS SHALL BE GRADED PER TYPICAL SECTION
7. IF AT ANY TIME DURING GRADING OPERATIONS, ANY UNFAVORABLE GEOLOGICAL CONDITIONS ARE ENCOUNTERED, GRADING IN THAT AREA WILL STOP UNTIL APPROVED CORRECTIVE MEASURES ARE OBTAINED FROM THE SOILS/GEOLOGIC ENGINEER.
8. A STANDARD 12-INCH HIGH BERM IS REQUIRED AT THE TOP OF ALL GRADED SLOPES. SEE BERM DETAIL.
9. STRAIGHT GRADE SHALL BE MAINTAINED BETWEEN CONTOUR LINES AND SPOT ELEVATIONS UNLESS OTHERWISE SHOWN ON THE PLANS.
10. ALL DEBRIS AND FOREIGN MATERIAL SHALL BE REMOVED FROM THE WORK AREA AND DISPOSED OF AT APPROVED DISPOSAL SITES. THE CONTRACTOR SHALL OBTAIN NECESSARY PERMITS FOR THE TRANSPORTATION OF MATERIAL TO AND FROM THE SITE.
11. ALL FILL MATERIAL SHALL BE COMPACTED TO NOT LESS THAN 90% OF MAXIMUM DENSITY AS DETERMINED BY A.S.T.M. SOIL COMPACTION TEST D-1557-78.
12. ALL AREAS TO RECEIVE FILL SHALL BE INSPECTED BY THE SOILS ENGINEER PRIOR TO PLACING OF FILL MATERIALS.
13. THE PERMITTEE'S SOILS ENGINEER SHALL BE NOTIFIED PRIOR TO COMMENCING ANY WORK UNDER THIS PLAN. SEE SHEET 2 FOR CONTACT INFORMATION. NO WORK WHICH DEVIATES FROM THESE PLANS AND SPECIFICATIONS SHALL BE DONE UNTIL A RECOMMENDATION IS RECEIVED FROM THE SOILS ENGINEER AND APPROVED BY THE CITY ENGINEER BY A STANDARD ICA.

ESTIMATED EARTHWORK QUANTITIES

PUBLIC WORKS:

RAW CUT: 2,300 C.Y.

RAW FILL: 410,000 C.Y.

B. GRADING PERMIT:

RAW CUT: 0 C.Y.

RAW FILL: 150,000 C.Y.

THE ABOVE LISTED QUANTITIES REFLECT THE ENGINEER'S ESTIMATE OF THE EARTHWORK VOLUMES.

THESE QUANTITIES ARE FOR DESIGN AND BONDING PURPOSES ONLY, AND NOT FOR CONTRACT PURPOSES.

THE CONTRACTOR IS RESPONSIBLE FOR COMPUTING HIS OWN QUANTITIES.

THESE PLANS HAVE BEEN REVIEWED AND CONFORM TO RECOMMENDATIONS OF SOILS ENGINEERING REPORTS DATED

GENERAL NOTES

OWNER/DEVELOPER:

PLAYA CAPITAL COMPANY, LLC
13250 W. JEFFERSON BLVD.
LOS ANGELES, CA 90094
CONTACT PERSON: RANDY JOHNSON

TELEPHONE: (310) 822-0774

SOILS ENGINEER/GEOLOGISTS:

LAW/CRANDALL INC.
200 CITADEL DRIVE
LOS ANGELES, CA. 90040

TELEPHONE: (213) 888-5300

REFERENCES

REPORT OF GEOTECHNICAL INVESTIGATION PROPOSED WETLANDS RESTORATION AND PROPOSED DEVELOPMENT NORTH OF JEFFERSON BOULEVARD, PLAYA VISTA-PHASE I-PARCEL S, AUGUST 8, 1991;

REPORT OF RECOMMENDATIONS FOR GRADING AND STORM DRAIN SUPPORT PHASE 1A AND FRESHWATER WETLAND GRADING PLAYA VISTA PROJECT, NOVEMBER 4, 1991;

SUPPLEMENTAL RECOMMENDATIONS FRESHWATER WETLANDS BERM PLAYA VISTA PROJECT, NOVEMBER 18, 1994.

RESPONSE TO CITY OF LOS ANGELES REVIEW COMMENTS GRADING PLAN FOR THE FRESHWATER WETLANDS, PHASE ONE PLAYA VISTA PROJECT LAW/CRANDALL, INC., DATED JANUARY 31,1995

LEGAL DESCRIPTION:

BEING A SUBDIVISION OF A PORTION OF RANCHO LA BALLONA, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA AS SHOWN ON MAP RECORDED IN BOOK 1 PAGES 204 ET SEQ. OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

BENCH MARK

ELEV. 11.841 YR.85 (3.809) B.M.# 17-02492

CITY OF L.A. SURV PEN "STAMD 17-02492 1972"
2FT E OF E CURB LINE OF LINCOLN BLVD. 19. 4FT N OF BC CURB RETURN N OF JEFFERSON BLVD. N END CB

JOB ADDRESS

13250 JEFFERSON BLVD.
MARINA DEL REY, CA. 90292

SURCHARGE FILL TO BE PLACED PER THIS PLAN. SEE PLAN SHEETS FOR MAXIMUM HEIGHT OF SURCHARGE "H". MAXIMUM SURCHARGE FILL HEIGHT EQUALS DEPTH OF COMPACTED FILL AT FINISH SURFACE GRADE. ACTUAL SURCHARGE HEIGHT VARIES WITH THE LENGTH OF TIME THE SURCHARGE IS ALLOWED TO SETTLE. SEE TABLE BELOW. WHEN STREETS THAT HAVE DIFFERENT H VALUES INTERSECT, USE GREATER VALUE THROUGH INTERSECTION.

LINCOLN AND JEFFERSON BOULEVARD
LOS ANGELES, CALIFORNIA

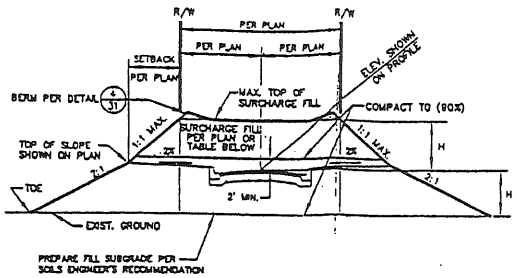
SURCHARGE FILLS (FILL THICKNESS IN ADDITION TO DESIGN HEIGHT OF EMBANKMENT) FOR TIME PERIODS OF 1, 3, 6, 9 AND 12 MONTHS ARE SUMMARIZED BELOW.

TIME AVAILABLE FOR SURCHARGING (MONTHS)	THICKNESS OF SURCHARGE FILL (% OF HEIGHT OF EMBANKMENT FILL)
1	100
3	85
6	35
9	30
12	25

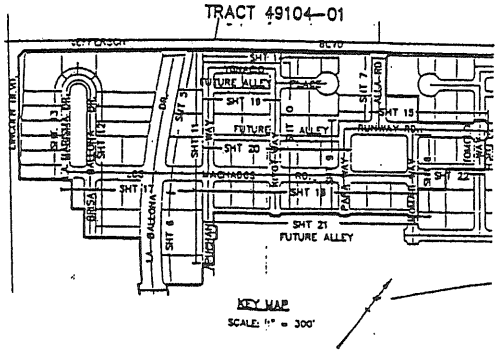
PER
"REPORT OF RECOMMENDATIONS FOR GRADING AND STORM DRAIN SUPPORT PHASE 1A AND FRESHWATER WETLAND GRADING PLAYA VISTA PROJECT"

NOTE:

SEE TRACT 49104-01 STREET PLANS FOR HORIZONTAL CONTROL ALIGNMENT DATA.

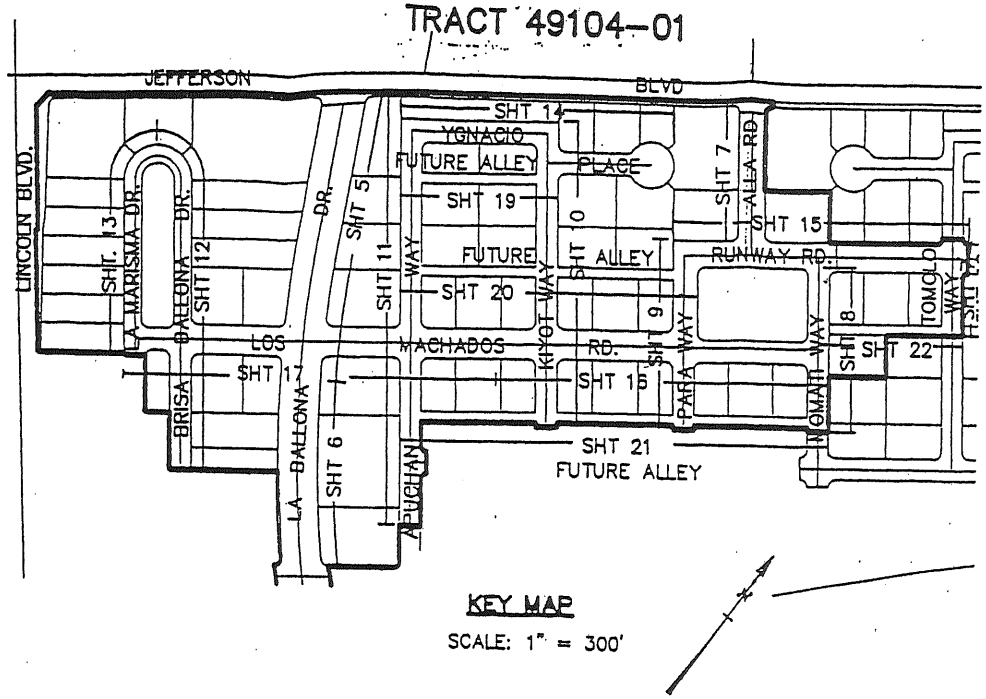


TYPICAL SURCHARGE SECTION
NOT TO SCALE



PLAYA VISTA DEVELOPMENT
TRACT 49104-01 STOCK PILE LOCATION

TRACT 49104-01



KEY MAP

SCALE: 1" = 300'

STRUCTURAL PLAN CHECK DIV./BUILDING BUREAU
DEPARTMENT OF BUILDING AND SAFETY - CITY OF LOS ANGELES

APPROVED

This set of [illegible] specifications MUST be at job site during construction. It is unlawful to alter or change same, or to deviate therefrom, without approval from the Dept. of Building & Safety. The [illegible] to permit or approve [illegible] and specifications SHALL NOT be held City [illegible] the violation of any provisions of any [illegible] This approval [illegible] ELECTRICAL, PLUMBING, HEATING or REFRIGERATION [illegible] shall be obtained from the respective [illegible]

BY D. Hou

DATE 1.13.98

PERMIT NO. 95VN86145

Extended
Mod. Log # 4087
1.13.98

3250 W Jefferson Blvd

Permit #: 98030 - 10000 - 00681
Plan Check BB9789 Reference #:
Event Code:

ading

Counter Permit

City of Los Angeles - Department of Building and Safety
APPLICATION FOR GRADING PERMIT
AND GRADING CERTIFICATE

Status: Ready to Issue
Status Date: 06/19/98
Printed on: 06/19/98 11:36:41

TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
ANCHO LA BALLONA		RAMONA S DE MACHADO 341.	441	D C C 2722 C F 64	099B157 3	4211 - 013 - ***

PARCEL INFORMATION
rport Hazard Area - YES
AS Branch Office - WLA
ouncil District - 6
ensus Tract - 2753.120
NE(S): C2(PV) /

Census Tract - 2765.000
Energy Zone - 6
Highway Dedication - YES
Lot Size - IRR ACREAGE

Lot Type - Corner
Thomas Brothers Map Grid - 702

4. DOCUMENTS
ZI - 1117
ZI - 1320
ZI - 1874
ORD - 160523
AFF - 57753
AFF - 61826
AFF - 61827
AFF - 62771

5. CHECKLIST ITEMS
Special Inspect - Grading:Area>60,000Sqft

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION
Owner(s):
Playa Capital Company Lls — 13250 Jefferson Blvd — LOS ANGELES, CA 90094
Tenant
Applicant (Relationship, Engineer)
- Psomas & Associates — 3420 Ocean Park Blvd — SANTA MONICA, CA 90405 — (310) 450-1217

7. EXISTING USE

PROPOSED USE
60 Grading - Non-Hillside

8. DESCRIPTION OF WORK
"This is the PCIS version of Plan Check No. BB9789" Lots Grading Site Preparation (Tentative Tract 49104) fill 505,000 cu yds

9. # Bldgs on Site & Use:

For information and/or inspection requests originating within LA County, call toll-free (888)-LA4BUILD; outside LA County, call (213)-977-6941.

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By:
OK for Cashier: Armando Flores
Signature:
DAS PC By:
Coord. OK:
Date:

For Cashier's Use Only W/O #: 83000681

PROJECT VALUATION & FEE INFORMATION Final Fee Period
Permit Valuation: 505.000 cu yd PC Valuation: 0 cu yd

IAL TOTAL Grading	19,424.45
mit Fee Subtotal Grading	17,475.00
n Check Subtotal Grading	0.00
. Surcharge	349.90
. Surcharge	1,049.70
nning Surcharge	524.85
nning Surcharge Misc Fee	5.00
mit Issuing Fee	20.00

06/19/98 11:47:20AM CASH T-05[illegible] C [illegible]
GRADING PERMIT 17,475.00
INVOICE # 0[illegible] PP
GRADING PLAN C 20.00
ONE STOP 349.90
SYS DEV 1,049.70
MISCELLANEOUS 5.00
CITY PLAN SURC 524.85
TOTAL 19,424.45
CHECK 19,424.45

ver Cap ID:

Total Bond(s) Due:

ATTACHMENTS
t Plan
-PCIS Application

98LA 75021

! INFORMATION NOTE !

A SEPARATE PERMIT FROM THE STATE OF CALIFORNIA DIVISION OF INDUSTRIAL SAFETY IS REQUIRED PRIOR TO STARTING CERTAIN WORK INVOLVING SUBSTANTIAL RISK TO WORKERS SUCH AS: CONSTRUCTION OR DEMOLITION EXCEEDING 3 STORIES OR 36 FEET IN HEIGHT; OR EXCAVATION OR TRENCHES OVER 5 FEET IN DEPTH INVOLVING ENTRY BY WORKERS. FOR INFORMATION, PHONE INDUSTRIAL SAFETY AT (818) 901-5403.

CITY OF LOS ANGELES

Department of Building and Safety

INSPECTION RECORD

PLEASE REVIEW THE CONTENTS OF THIS CARD PRIOR TO THE START OF ANY CONSTRUCTION

IMPORTANT NOTICE!!!

PRESERVE THIS RECORD OF YOUR BUILDING INSPECTIONS

This card must be posted on the job site. The approved plans and the card must always be available to this Department's Inspectors. There may be additional trip fees assessed for unnecessary calls.

No person shall perform any construction or repair work between the hours of 9:00 P.M. and 7:00 A.M. the following day which results in loud noises to the disturbance of persons occupying sleeping quarters in any dwelling, hotel, or apartment or other place of residence. (Sec. 41.40 L.A.M.C.)

No person, other than an individual homeowner engaged in the repair or construction of his/her single family dwelling shall perform any construction or repair work of any kind upon any building or structure located on land developed with residential buildings or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or at any time on any Sunday. (Sec. 41.40 L.A.M.C.)

Dust control measures to prevent dust from being blown or deposited over or upon any private property in any residential area must be implemented during any excavation or other earth moving phase of the construction.

Prior to the start of any construction work adjacent to any public way, pedestrian protection shall be provided as follows: (Sec. 91.4407 L.A.M.C.)

Height of construction	Distance from construction to the public way	Type of protection required
8 feet or Less	Less than 6 feet	railing
	6 feet or more	none
more than 8 feet	Less than 6 feet	fence and canopy
	6 feet or more but not more than one-fourth the height of construction	fence and canopy
	6 feet or more but not more one-fourth to one-half the height of construction	fence
	6 feet or more but exceeding one-half the height of construction	none

Building permits are valid for a period of two years or expire on the 180th day from the date of issuance if the work permitted thereunder has not been commenced or expire whenever the Department determines by inspection that the work on any building for which a permit has been issued and the work started thereon has been suspended for a period of 180 days or more.

INSPECTION PHONE LIST

COMMUNITY SAFETY BUREAU – 1 and 2 Dwelling Units Substandard Orders - Residential & Commercial		
	Inspection Request Lines (24 Hours)	Information (7:30 A.M. to 5:00 P.M.) and Inspectors (7 to 8 A.M.)
Downtown Office	(213) 485-7044	(213) 485-7091
Van Nuys Office		(818) 756-8201
West L.A. Office	(310) 575-8063	(310) 575-8200
San Pedro Office	(310) 548-7556	(310) 548-7557

BUILDING INSPECTION 3 or More Dwelling Units, Commercial, Industrial		
	Inspection Request Lines (24 Hours)	Information (7:30 A.M. to 5:00 P.M.) and Inspectors (7:30 to 8:30 A.M. only)
Downtown Office	(213) 485-2022	(213) 485-2365
Van Nuys Office	(818) 756-8589	(818) 756-8206
West L.A. Office	(310) 575-8063	(310) 575-8200
San Pedro Office	(310) 548-7556	(310) 548-7557

Disabled Access Information ..... (213) 485-5109

Grading Inspections	
Inspection request Lines	
Downtown Office (8 A.M. to 5 P.M.)	(213) 485-3435
Van Nuys Office (8 A.M to 5 P.M.)	(818) 756-8211
West L.A. Office (24 Hours)	(310) 575-8063
San Pedro Office (24 Hours)	(310) 548-7556

The 24-Hour answering service in the Downtown, Van Nuys, West L.A. and San Pedro Offices is a recording device. When requesting inspection, the following information is required: (1) Job Address (2) Type of Inspection (3) Use of Building and (4) Permit number. Calls received before 3:00 p.m. will be made the following day. However, if inspection is not made, it will be necessary to recall for inspection.

For Mechanical Inspections on Residential Buildings of over 3 units, and on Commercial and Industrial Buildings, call the Mechanical Division numbers in the appropriate office: (As Listed Below)

LA (213) 485-2071 VN (818) 756-8585
WLA (310) 575-8063 SP (310) 548-7556

INSPECTION SERVICES WILL NOT BE PROVIDED WHEN THERE IS AN UNLEASHED DOG ON THE PREMISES.

DEPARTMENT OF BUILDING AND SAFETY
INSPECTION RECORD
CITY OF LOS ANGELES

Do Not Call for Framing Inspection Until Electrical, Plumbing & Heating Approvals have been Obtained.

ADDRESS OF JOB

NATURE OF WORK

BLDG. PERMIT NO. 9811 75[illegible]
08/12/98 11:47:12
LADBS-0505 C 10

OWNER

Inspections	Date	Inspector
Rough Electrical		
Rough Plumbing		
Rough Heating & Refrig.		
Rough Disabled Access		
Rough Framing		
Rough Fire Sprinklers		
Insulation		
OK to Cover		
DO NOT COVER UNTIL ABOVE IS SIGNED		
Exterior Lathing		
Interior Lathing		
OK to Plaster		
DO NOT PLASTER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE BUILDING		
Sewer		
Gas		
Heating & Refrigeration		
Electrical Underground		
FINAL INSPECTIONS		
Final Electrical		
Final Gas		
Final Plumbing		
Final Heating & Refrigeration		
Final Fire Sprinklers		
Final L.A.F.D. OK Title 19 Jobs Only		
Final Disabled Access		
Final Grading		
Final		

Inspections	Date	Inspector
GRADING INSPECTIONS		
Initial Grading		
Toe or Bottom		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Excavation		
Fill		
Drainage Devices		
Rough Grading		
BUILDING AND MECHANICAL INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
DO NOT PLACE CONCRETE UNTIL ABOVE IS SIGNED		
Heating & Refrig. Groundwork		
Electrical Groundwork		
Plumbing Groundwork		
Gas Piping Groundwork		
OK to Place Slab Floor		
DO NOT PLACE CONCRETE SLAB FLOOR UNTIL ABOVE IS SIGNED		

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 8117

DISTRIBUTION

☒ Owner ☒ } WLA ..... Pl Ck.
☒ Petitioner ☒ } ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 13250 Jefferson Blvd

LOT(S) 1-56 BLK

TRACT Tract 49104-01

District Office W.LA
Plan Ck No. BB9789
Zone
Permit No. 98LA76021
Job Order No. ENG/PL/CK
Bureau/Division Grading
Use of Bldg.
Job Status

Type
Stories
Occ.
No. Units
F. D.
D. M.
C. D.

1

Owner Playa Capital Company, LLC
Address 1255 W. Jefferson Blvd #300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
W. Los Angeles, CA Zip 90064
Daytime Phone (310) 954-3745

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To exten the Grading Permit # 98LA-76021 (Lots Grading Site Preparation, Tract 49104-01) to Complete the work.

Dept. Comment Extend Grading Permit

Code Sections: L.A.M.C.— 98.0602
Title 24— 98.0605

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Not Completed due to court injuction. Awaiting court decision to Complete. Expect decision in 6 to 12 months.

Petitioner's Signature [signature] Position For Psomas. Moe Lahmoth Date 7/7/2000.

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☒ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 8-15-2000

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. THIS APPROVAL IS ONLY FOR THE EXISTING STOCK PILE TO REMAIN AND DOES NOT ALLOW ANY GRADING ACTIVITIES.
2. THIS APPROVAL EXPIRES ON 08-15-2001.

LA Department of Buildings and Safety
LA 05 17 011579 07/07/00 11:03AM

BOARD APPLIC FEE $100.00
PLAYA VISTA PROJ

Total Due: $100.00
(Cashier Use Only) $100.00

NO FEE NO FEE NO FEE
Name: PLAYA CAPITAL CO
Addr: 1255 W. JEFFERSON BLVD
Auth: PLAYA VISTA PROJ
Dept: PLAYA VISTA

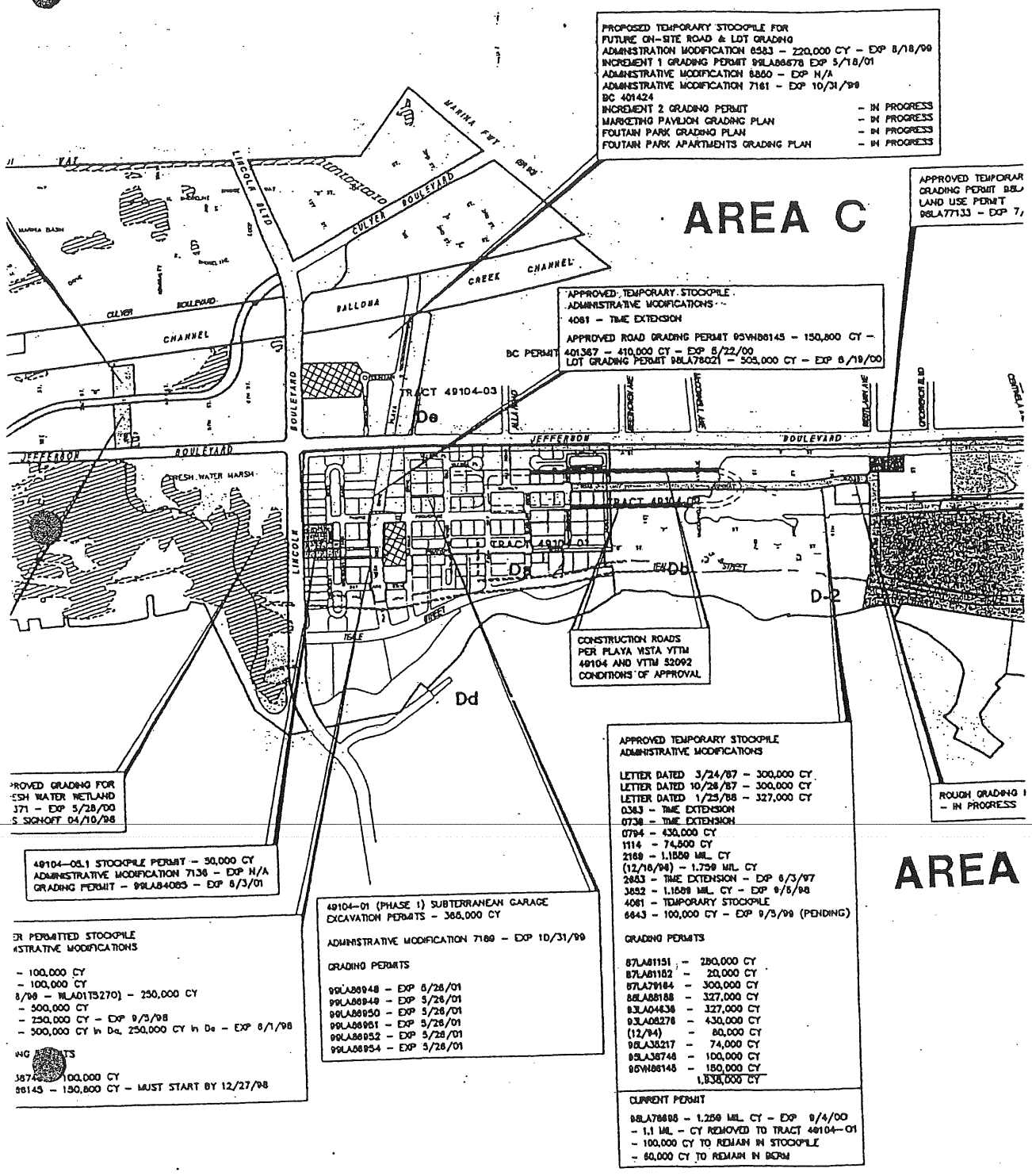
Fee Due
Fee Verified

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....


PROPOSED TEMPORARY STOCKPILE FOR
FUTURE ON-SITE ROAD & LOT GRADING
ADMINISTRATION MODIFICATION 6583 – 220,000 CY – EXP 8/18/99
INCREMENT 1 GRADING PERMIT 98LA86678 EXP 5/18/01
ADMINISTRATIVE MODIFICATION 8860 – EXP N/A
ADMINISTRATIVE MODIFICATION 7161 – EXP 10/31/98
BC 401424
INCREMENT 2 GRADING PERMIT – IN PROGRESS
MARKETING PAVILION GRADING PLAN – IN PROGRESS
FOUTAIN PARK GRADING PLAN – IN PROGRESS
FOUTAIN PARK APARTMENTS GRADING PLAN – IN PROGRESS
AREA C
APPROVED TEMPORARY STOCKPILE
ADMINISTRATIVE MODIFICATIONS
4081 – TIME EXTENSION
APPROVED ROAD GRADING PERMIT 95VN86145 – 150,800 CY –
BC PERMIT 401367 – 410,000 CY – EXP 8/22/00
LOT GRADING PERMIT 98LA78021 – 505,000 CY – EXP 8/19/00
MARINA FWY
LINCOLN BLVD
CULVER BOULEVARD
CREEK CHANNEL
BALLONA
CULVER BOULEVARD
CHANNEL
TRACT 49104-03
De
JEFFERSON BOULEVARD
FRESH WATER MARSH
LINCOLN BOULEVARD
TRACT 49104-01
Dc
Db
Dd
D-2
CONSTRUCTION ROADS
PER PLAYA VISTA VTTM
49104 AND VTTM 52092
CONDITIONS OF APPROVAL
APPROVED TEMPORARY STOCKPILE
ADMINISTRATIVE MODIFICATIONS
LETTER DATED 3/24/87 – 300,000 CY
LETTER DATED 10/26/87 – 300,000 CY
LETTER DATED 1/25/88 – 327,000 CY
0383 – TIME EXTENSION
0738 – TIME EXTENSION
0784 – 430,000 CY
1114 – 74,800 CY
2169 – 1.1559 MIL. CY
(12/16/94) – 1.759 MIL. CY
2653 – TIME EXTENSION – EXP 8/3/97
3652 – 1.1559 MIL. CY – EXP 9/5/98
4081 – TEMPORARY STOCKPILE
6643 – 100,000 CY – EXP 9/3/99 (PENDING)
GRADING PERMITS
87LA81151 – 250,000 CY
87LA81152 – 20,000 CY
87LA79164 – 300,000 CY
88LA88188 – 327,000 CY
93LA04836 – 327,000 CY
93LA08278 – 430,000 CY
(12/94) – 80,000 CY
95LA38217 – 74,000 CY
95LA38746 – 100,000 CY
95VN86145 – 150,000 CY
1,938,000 CY
CURRENT PERMIT
98LA78698 – 1.259 MIL. CY – EXP 9/4/00
– 1.1 MIL – CY REMOVED TO TRACT 49104-01
– 100,000 CY TO REMAIN IN STOCKPILE
– 60,000 CY TO REMAIN IN BERM
ROUGH GRADING
– IN PROGRESS
AREA
49104-08.1 STOCKPILE PERMIT – 30,000 CY
ADMINISTRATIVE MODIFICATION 7136 – EXP N/A
GRADING PERMIT – 98LA84085 – EXP 8/3/01
49104-01 (PHASE 1) SUBTERRANEAN GARAGE
EXCAVATION PERMITS – 365,000 CY
ADMINISTRATIVE MODIFICATION 7189 – EXP 10/31/99
GRADING PERMITS
98LA86948 – EXP 5/26/01
98LA86949 – EXP 5/26/01
98LA86950 – EXP 5/26/01
98LA86951 – EXP 5/26/01
98LA86952 – EXP 5/26/01
98LA86954 – EXP 5/26/01
100,000 CY
150,800 CY – MUST START BY 12/27/98

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 8544
	DISTRIBUTION
	☑ Owner ☑ ..W.L.A... Pl Ck.
	☑ Petitioner ☑ .....W.L.A... Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS 13250 Jefferson Blvd

LOT(S) 1-56 BLK

TRACT 49104-01

Owner ...Playa Capital Company, LLC...
Address ...12555 W. Jefferson Blvd #300...
...Los Angeles... CA Zip ...90066...
Daytime Phone (310) 822-0074

1

Petitioner ...Psomas...
Address ...11444 W. Olympic Blvd #750...
...W. Los Angeles... CA Zip ...90064...
Daytime Phone (310) 954-3745

District Office ...W.L.A.... Type.....
Plan Ck No. ...BB 97789... Stories.....
Zone ..... Occ. .....
Permit No. ...98LA76021... No. Units .....
Job Order No. ..... F. D. .....
Bureau/Division ...Grading... D. M. .....
Use of Bldg. ...Section... C. D. ...6...
Job Status ...Grading...

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To Allow Grading Activities, See Attached letter from Psomas dated January 8, 2001 for Tract 49104-01 Mass Grading and Modification #8117 dated 8,15, 2000 & Exhibits

Dept. Comment TO EXTEND GRADING PERMIT TO ALLOW CONTINUATION OF GRADING

Code Sections: L.A.M.C.– 91.106.4.4.

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Completion of Mass Grading of Tract 49104-01 Per Grading Permit #98LA-76021 and CDM's letter dated Nov 1, 2000 and Psomas letter dated January 8, 2001.

Petitioner's Signature ... "Moe Lahooti" Position For Psomas Date 1.10.2001

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☒ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~is not~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

01-16-2001
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. GRADING ACTIVITIES SHALL BE RESTRICTED FROM ANY AREAS SUBJECT TO CURRENT OF FUTURE METHANE TESTING AND/OR MITIGATION MEASURES.
2. THIS APPROVAL EXPIRES ON 01-16-2002.

LA Department of Building and Safety
LA 02 15 028460 01/10/01 04:15PM

BOARD APPLIC FEE $100.0

Total Due: $100.0
(Cashier Use Only) $100.0

No. of Items 1
Fee due 100.00
Fee verified MZ

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

November 1, 2000

Mr. Dave Chernik
Playa Capital Company
12555 West Jefferson Boulevard, Suite 300
Los Angeles, California 90066

Subject: Status of Methane Testing in Areas of Existing or Proposed Grading at Playa Vista

Dear Mr. Chernik:

Per your request, this letter provides a status of methane testing in areas of existing or proposed grading at Playa Vista. We understand this information will be provided to meet the request of David Hsu of the City of Los Angeles Department of Building and Safety regarding approval of new or modified grading permits. The following list of applicable permits was provided by Mike Crehan of Psomas in his memorandum to you on October 31, 2000. Discussions of methane testing results in these areas follow.

Permit #/Modification #	Location	Description
98LA76021/Mod 8117	Tract 49104-01	Mass grading of the Tract 49104-01 lots
98LA77388/Mod 8118	Area south of Jefferson and east of Centinela	Existing 300K cubic yard stockpile
New Mod	Area south of Runway Road and east of Tract 49104-02	New 300K cubic yard stockpile
New permit	Tract 49104-01 lots	Garage excavations in Tract 49104-01 lots

Tract 49104-01

Soil gas sampling was completed in this area in November 1999 as directed by Exploration Technologies, Inc (ETI). CDM followed with installation of groundwater monitoring wells in April 2000 at the request of ETI and the LADBS. CDM is in process of completing a number of protocols for further methane-related activities within the western portion of Tract 49104-01

(approximate area west of 4th Street) as directed by Playa Capital Company. These protocols are for soil gas and groundwater assessment as discussed with the LADBS, Victor Jones of ETI, Playa Vista, and Latham and Watkins. At this time, no other methane related activities are proposed for the remaining portion of Tract 49104-01 (east of 4th Street). .

Area South of Jefferson and East of Centinela (existing 300K cubic yard stockpile)

The area south of Jefferson and east of Centinela is currently occupied by a 300,000 cubic yard soil stockpile. As per sampling requirements of Victor Jones, CDM has neither collected nor plans to collect samples from areas of stockpile or recent surcharge. Thus, there are no methane-related activities planned for the existing 300,000 cubic yard stockpile within the referenced area.

Area South of Runway Road and East of Tract 49104-02

The shallow soil gas was recently sampled in this area as part of the October 2000 event for the Playa Vista Phase 2 portion of the property. The analytical results have been received and technical memorandum is in preparation for submittal to the LADBS. At this time, further sampling has not been proposed for this area.

Sincerely,

CAMP DRESSER & McKEE INC.

Michele Zych
Project Geologist

cc: Mike Crehan, Psomas

PSOMAS

Information and Engineering Solutions

January 8, 2001

Mr. David Hsu
Department of Building and Safety
Grading Division – 3rd Floor, Counter I
201 Figueroa Street
Los Angeles, CA 90012

Subject: Playa Vista – Tract 49104-01 Mass Grading Modification

Dear Mr. Hsu:

We are requesting that a Modification be issued to allow the completion of the mass grading of Tract 49104-01 in Playa Vista under the requirements of the original Mass Grading Permit. A copy of the original permit and all modifications issued for time extensions are included with this submittal. As you may recall, the latest Modification for time extension was issued with the restriction that no work was to be performed until it could be stated that gas soils sampling would not be affected by grading operations. The attached letter from CDM to Playa Vista indicates that this is the case. This requirement, and additional Building & Safety requirements, are satisfied as presented below:

Per your request, we have obtained a letter from CDM addressed to Playa Vista stating that field testing soil gas sampling has been completed in this area.

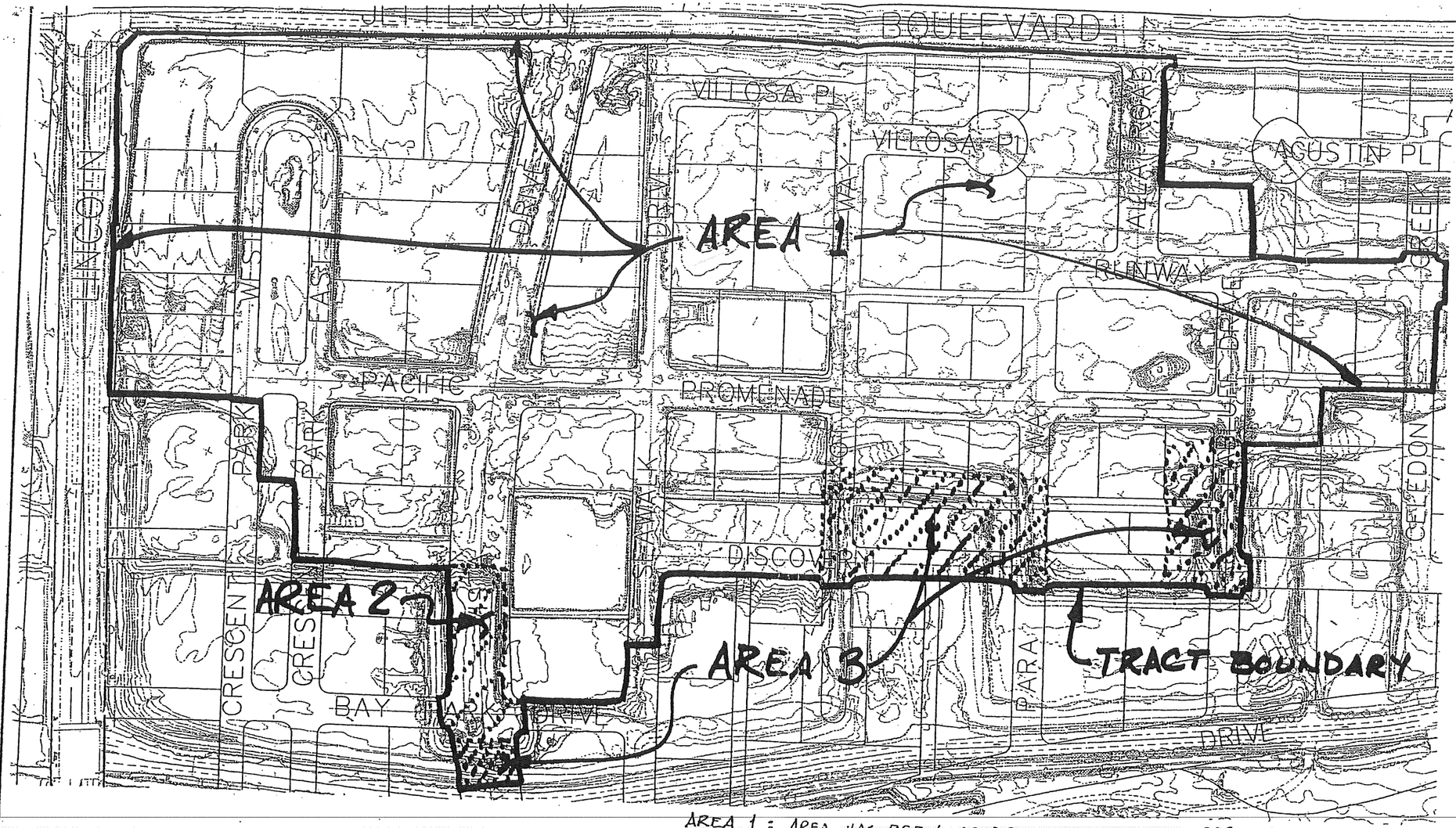
Per your request, Playa Vista understands that if further soils gas sampling is required in this area, grading operations will be conducted in such a manner as to avoid interfering with said potential sampling.

This Modification allows only those grading operations specifically called for in the original permit. Per your request, this specifically restricts grading below the groundwater elevation.

Per your request, a new Exhibit "A" with additional cross sections and notes has been prepared and is included with this submittal. This exhibit indicates the location of work previously conducted and the location of work remaining.

11444 West Olympic Blvd
Suite 750
West Los Angeles, CA 90064-154

310.954.3700
310.954.3777 Fax
www.psomas.com



VICINITY MAP
SCALE: 1" = 10,000'

PROJECT SITE

NOTE: AREAS INDICATED ARE APPROXIMATE. EXACT LIMITS TO BE DETERMINED IN FIELD BY CONTRACTOR AND APPROVED BY B&S INSPECTOR TO ADHERE TO ORIGINAL PERMIT REQUIREMENTS.

NOTE:

FIELD TESTING OF SOIL GAS SAMPLING HAS BEEN COMPLETED IN THIS AREA. IF FURTHER SOILS GAS SAMPLING IS REQUIRED IN THIS AREA; GRADING OPERATIONS WILL BE CONDUCTED IN SUCH A MANNER AS TO AVOID INTERFERING WITH SAID POTENTIAL SAMPLING. NO GRADING BELOW THE GROUNDWATER ELEVATION. NO SETTLEMENT "CREDIT" WILL BE REQUESTED UNDER THIS MODIFICATION.

AREA 1 : AREA HAS BEEN GRADED PER ORIGINAL PERMIT. WORK IS SUBSTANTIALLY COMPLETE, INCLUDING OVER-EX, FILL, SURCHARGE, AND SURCHARGE REMOVAL.

AREA 2 : AREA HAS BEEN OVER-EX'D, GRADED, AND SURCHARGED PER ORIGINAL PERMIT. SURCHARGE REMOVAL REQUIRED.

AREA 3 : GRADING PER ORIGINAL PERMIT REQUIRED. THIS AREA WAS NOT PREVIOUSLY GRADED DUE TO A LAWSUIT (NOW OVERTURNED) WHICH DELAYED FILLING IN WETLANDS.

200' 100' 0' 200' 400'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

Playa Capital Company, LLC
Playa Vista Development

TRACT 49104-01
GRADING EXHIBIT
EXHIBIT "A"

PSOMAS

DATE: 01/09/01 REVISED ON:
JOB No:1PCC0203.20

SHEET 1 OF 1

PSOMAS

To summarize, this letter, the CDM letter, Exhibit "A", the Modification application, and the appropriate $100.00 fee are submitted at your request with the understanding that the Building & Safety requirements for this Modification issuance will now be satisfied. We ask that you please issue the Modification within a week to allow the continuation of mass grading operations.

If you have any questions please do not hesitate to call me.

Sincerely,
Psomas

Michael J. Crehan, P.E.
Project Manager

Copy: Pat Larkin, Tim Connors, David Nelson – Playa Vista
Paul Pegg, James Slater, Jay Oldham – The Moote Group
Mike Kremer, Leticia Cordoso - Psomas

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 9021

DISTRIBUTION

☒ Owner ☒ ..... Pl Ck.
☒ Petitioner ☒ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 13250 Jefferson Blvd

LOT(S) 1-56 BLK

TRACT Tract 49104-01

1

Owner Playa Capital Company, LLC
Address 12555 W. Jefferson Suite #300
Los Angeles CA Zip 90066
Daytime Phone (310) 822-0074

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
Los Angeles CA Zip 90064
Daytime Phone (310) 954-3700 (MOE)

District Office 7
Plan Ck No. BB 9789
Zone
Permit No. 98LA76021
Job Order No. Eng/PL/CK
Bureau/Division
Use of Bldg. Grading
Job Status

Type
Stories
Occ.
No. Units
F.D.
D.M.
C.D.

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To extend the Grading Permit # 98 LA 76021 (Lot Grading for site Preparation, Tract 49104-01) & Modification # 8117 dated 8/15, 2000 extend until 8/15/02.

Dept. Comment Extension of Time

Code Sections: L.A.M.C.— 98.0602

Title 24— 98.0605

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading work not completed and it is in progress. Expect to complete in 12 months.

Petitioner's Signature [signature] Position For Psomas Date 8/2/2001

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... Eric Calvert
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

Date 8/14/01

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This approval is only for the ~~existing stockpile~~ products to remain as shown on the attached plot plan. ~~and does not allow any grading activities~~

2. This approval expires on 9/16/02. EC.

LA Department of Building and Safety
LA 04 10 040896 08/09/01 01:19PM
BOARD APPLIC FEE $100.00
Total Due: $100.00
No Fee: $100.00
NO FEE NO FEE NO FEE
(Cashier Use Only)
Name: PLAYA CAPITAL CO., LLC
Addr: 13250 JEFFERSON BL
Auth: FEE WAIVER
Dept: PLAYA VISTA
No. of Items $100.00
Fee due
Fee verified

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

(8)

B & S COM-31 (R 1/88)

PSOMAS

Information and Engineering Solutions

May 7, 2001

Mr. David Hsu
Department of Building and Safety
Grading Division – 3rd Floor, Counter I
201 Figueroa Street
Los Angeles, CA 90012

Subject: Pad Certification – Playa Vista, Tract 49104-01, Lots 13,14, and 15

Dear Mr. Hsu

Recently, Psomas has performed a topographic survey and site inspection to determine the pad grade elevations for Lots 13, 14, and 15 of Tract 49104-01. This letter is presented for your records to state that the graded lot elevations are in substantial conformance to the approved tract grading plans, B&S Permit Number 98LA76021.

If you have any questions please do not hesitate to call me.

Sincerely:

PSOMAS

Michael J. Crehan, P.E.
Project Manager

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. CREHAN
No. C48944
Exp. 9-30-04
CIVIL
STATE OF CALIFORNIA

Copy: Pat Larkin, Tim Connors, Mike Griffith – Playa Vista
Paul Pegg, Cliff Ritz – The Moote Group
Mike Kremer - Psomas

11444 West Olympic Blvd.
Suite 750
West Los Angeles, CA 90064-1549

310.954.3700
310.954.3777 Fax
www.psomas.com

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 9447

DISTRIBUTION

☒ Owner ☒ ..... Pl Ck.
☒ Petitioner ☒ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 13250 Jefferson Blvd

LOT(S) 1-56 BLK

TRACT 49104-01

Owner Playa Capital Company LLC
Address 12555 W. Jefferson Blvd #300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

1

Petitioner Psomas
Address 11444 W. Olympic Blvd. #750
Los Angeles, CA Zip 90064
Daytime Phone (310) 954-3100
310) 954-3777 fax

District Office WLA
Plan Ck No. EB9789
Zone
Permit No. 98LA76021
Job Order No.
Bureau/Division Grading
Use of Bldg.
Job Status Under Construction

Type
Stories
Occ.
No. Units
F. D.
D. M.
C. D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To grant an extension of existing Modification #544 to allow continued grading activities under permit # 98LA 76021. See attached letter & exhibits. Allow extension of time until July 29, 2002.

Dept. Comment Extension of Time

Code Sections: L.A.M.C.— 98.0602
Title 24— 98.0605

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

To complete grading activities of Tract 49104-01 per grading #98LA 76021

Petitioner's Signature [signature] Position Psomas Date 1/24/02

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☐ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... Eric [signature]
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

Date 2/1/02

LA Department of Building and Safety
LA 03 16 055577 01/24/02 04:24PM
BOARD APPLIC FEE $100.00

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This approval is only for the products to remain as shown on the attached plan plan.

2. This approval expires 7/29/02.

Total Due: $100.00
No Fee: $100.00

NO FEE NO FEE NO FEE
Name PLAYA VISTA
Addr 12555 W JEFFERSON
Auth WAIVED FEE LETTER PL
Dept CITY PLANNING
(Planner Use Only)

No. of Items 1
Fee due $100
Fee verified B.C.

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

CLASS "B" APPLICATION / PERMIT

ISSUED UNDER SECTIONS 62.105 TO 62.116 INCLUSIVE, LOS ANGELES MUNICIPAL CODE (SEE REVERSE HEREOF)

DISTRICT:	CHECKING NO	CONST. NO.
WEST LA	BD401335	BC401367

I HEREBY REQUEST PERMISSION TO CONSTRUCT THE IMPROVEMENTS DESCRIBED BELOW UNDER PRIVATE CONTRACT AND, IF PERMISSION IS GRANTED, I AGREE TO CONSTRUCT SAME IN ACCORDANCE WITH PLANS AND/OR SPECIFICATIONS APPROVED BY THE CITY ENGINEER. I ALSO ACKNOWLEDGE THAT I HAVE REVIEWED THE GENERAL INFORMATION PRESENTED ON THE REVERSE OF THIS APPLICATION, AND AGREE TO THE PROVISIONS STATED THEREON.

SHEET NO. 1 OF 2 SHEETS	DATE ISSUED: 12/31/2001	DATE EXPIRES: Until Closed

PROJECT: EBPERGEN	PROGRAM: 0400	ENGR DIST.: E6201850	REIMB FLG: YES	DIR/INDIR: D

STREET AND LIMITS TO BE IMPROVED
(SEE CONSTRUCTION TOTALS AT RIGHT)
JEFFERSON BLVD SLY FROM LINCOLN BLVD TO BEETHOVEN ST

ESTIMATED 2% SURCHARGE = $4,347.00
ESTIMATED 7% SURCHARGE = $15,213.00

INDICATE SCOPE ---
PAVING, CURB, GUTTER, WALK, SEWERS, DRAINS, CATCH BASIN LIGHTS, TREES, ETC.
GRADE VESTING TENTATIVE TRACT 49104-01

ENGR. PLAN CHECK DEPOSIT	NO. TREES	WELLS	TREE PLANTING FEE	DISTRICT MAP NO.	DIVISION INDEX	DRAINAGE MAP	COUNCIL DISTRICT
$72,444.00	0	0	$0.00	99B157		560	6

SANDBLASTING FEE	DOT SIGN DEPOSIT	TRAFFIC DEPOSIT	PROPOSED R/W NO.	SPECIAL REFERENCES
$0.00	$0.00	$0.00		

CONST. - INSPECTION DEPOSIT	TOTAL FEE DEPOSIT
$144,888.00	$236,892.00
TYPE OF PROJECT: Tract	TOTAL BOND DEPOSIT: $0.00
IMPROVEMENT BOND NO.: CA120124	BONDING PURPOSE: TR 49104-01
LIABILITY INSURANCE NO.: CA000599	LIAB. INSUR. EXPIR. DATE: 05/15/2003

PRIVATE ENGINEER: PSOMAS AND ASSOCIATES
STREET ADDRESS: 11444 W OLYMPIC BL SUITE 750

CITY	ZIP	PHONE NO.
LOS ANGELES	90064	310 954 3700

OWNER-APPLICANT (SEE REVERSE): PLAYA CAPITAL COMPANY LLC
STREET ADDRESS: 13250 JEFFERSON BL

CITY	STATE	ZIP
LOS ANGELES	CA	90094

(AREA CODE) PHONE NO.	DATE SIGNED BY APPLICANT
310 822-0074	12/19/01

SIGNATURE (SEE REVERSE BEFORE SIGNING): [signature]
APPLICANT'S NAME (ADD TITLE IF OFFICER): G. MICHAEL GRIFFITH

DISTRICT/DIVISION OFFICE	ISSUED BY: LUIS CRUZ
TIME	DATE

JOB ADDRESS:

DIST. ENGR. [signature] for Michael Patonal — DATE 1-4-02

CONSTRUCTION ITEMS	ESTIMATED COST
GRADING	$4,199,700.00
PAVING CURB / GUT. / SDWLK	$0.00
SEWER	$0.00
STORM DRAIN	$0.00
STREET LIGHTS	$0.00
TRAFFIC SIGNALS	$0.00
SUBTOTAL	$0.00
+ % PCF	$629,900.00
CONSTRUCTION ESTIMATE	$4,829,600.00
+ % CIF	$0.00
BOND ESTIMATE	$5,315,500.00

REGISTER RECEIPT VALIDATION

PERMIT TITLE (INCLUDE TRACT, PMLA, CPC, ZA, OR PVT. ST. NUMBER, OR R3)
TR49104-01
PLAYA VISTA DEVELOPMENT PHASE I (STREET GRADING IMPROVEMENTS)

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
Office of the City Engineer

West Los Angeles District Office
District/Division Office
Council District No. 6
Permit No. BC401367
Date Issued: May 2,2001

3SM91392100
Surety Bond No.

CA-120124
Attach to City Attorney No.

APPROVED FOR THE CITY ENGINEER BY
BOND CONTROL
DEVELOPMENT SERVICES DIV.

APPROVED
JAMES K. HAHN
CITY ATTORNEY
MAY 30 2001
BY J. HOARD
Deputy

GENERAL BOND RIDER

WHEREAS, under the date May 30,2000, I/we PLAYA CAPITAL COMPANY,LLC,A DELAWARE LIMITED LIABILITY COMPANY

as Principal and AMERICAN MOTORIST INSURANCE COMPANY as Surety, executed in favor of the City of Los Angeles, a certain bond in the sum of ONE MILLION SIXTY THREE THOUSAND & NO/100 Dollars ($1,063,000.00) guaranteeing construction of certain public improvements located at-in JEFFERON BL SLY.,FROM LINCOLN BL TO BEETHOVEN ST. (PLAYA VISTA DEVELOPMENT STREET GRADING IMPROVEMENTS TRACT49104-01)

to be completed on or before May 30, 2001, and

WHEREAS, the Principal ___ and Surety have agreed to amend said bond by extending the time within which to construct and complete said public improvements, and

WHEREAS, the Obligee is willing to accept said amendments, as agreed,

NOW THEREFORE, it is agreed by the undersigned Principal ___ and Surety on said bond that the time for performance shall hereby be extended to on or before May 30 ,2002

and the face amount of the bond to remain the same.

And it is hereby expressly agreed that the effective date of this Rider is the date of its acceptance by the City, and all other terms and conditions shall remain the same as originally written.

(SIGNATORIES AND ACKNOWLEDGMENTS ON REVERSE HEREOF)

IN WITNESS WHEREOF, this instrument has been duly executed by the above named PRINCIPAL and SURETY on May 22, 2001

PRINCIPAL SIGNATORIES

MG

PRINCIPAL SIGNATORIES

SURETY: American Motorists Insurance Company

BY: B.A. Matson (Attorney-in-Fact)

B.A. Matson

Surety's Address: 777 So. Figueroa St.
Los Angeles, CA 90017

SEE INSTRUCTIONS FOR SIGNATURES AND ACKNOWLEDGEMENTS ON "NOTICE TO CLASS B PERMIT AND BOND APPLICANTS" (FORM ENG. 3.6983-REVISED)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Los Angeles

On May 22, 2001 before me, Adriana Valenzuela, Notary Public

personally appeared B.A. Matson

☒ personally known to me - OR - ☐ proved to me on the basis of satisfactory evidence the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

ADRIANA VALENZUELA
Commission # 1206927
Notary Public - California
Los Angeles County
My Comm. Expires Jan 3, 2003

WITNESS my hand and official seal.

Notary Public Seal

SIGNATURE OF NOTARY

OPTIONAL

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

DESCRIPTION OF ATTACHED DOCUMENT:

TITLE OR TYPE OF DOCUMENT: _____

DOCUMENT DATE: _____

CAPACITY(IES) CLAIMED BY SIGNER(S)

Signer's Name: _____	**Signer's Name** _____
☐ INDIVIDUAL	☐ INDIVIDUAL
☐ CORPORATE OFFICER	☐ CORPORATE OFFICER
Title(s) _____	Title(s) _____
☐ PARTNER(S) ☐ LIMITED ☐ GENERAL	☐ PARTNER(S) ☐ LIMITED ☐ GENERAL
X ATTORNEY-IN-FACT	☐ ATTORNEY-IN-FACT
☐ TRUSTEE(S)	☐ TRUSTEE(S)
☐ GUARDIAN/CONSERVATOR	☐ GUARDIAN/CONSERVATOR
☐ OTHER: _____	☐ OTHER: _____
Signer is representing:	**Signer is representing:**
NAME OF PERSON(S) OR ENTITY(IES)	NAME OF PERSON(S) OR ENTITY(IES)
_____	_____

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Los Angeles } ss.

On May 22, 2001 (Date), before me, Judy Swank, Notary Public (Name and Title of Officer (e.g., "Jane Doe, Notary Public")),

personally appeared Bruce D. Harrigan and Randy Johnson (Name(s) of Signer(s)),

☒ personally known to me
☐ proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) ~~is~~/are subscribed to the within instrument and acknowledged to me that ~~he/she~~/they executed the same in ~~his/her~~/their authorized capacity(ies), and that by ~~his/her~~/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

J. SWANK
Commission # 1236194
Notary Public - California
Los Angeles County
My Comm. Expires Oct 2, 2003

Place Notary Seal Above

Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: General Bond Rider for Surety Bond No. 3SM91392100

Document Date: 5/22/01 Number of Pages: 1

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer

Signer's Name: _____

☐ Individual
☐ Corporate Officer — Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney in Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: _____

Signer Is Representing: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

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KEMPER.

Home Office: Long Grove, IL 60049

POWER OF ATTORNEY

Know All Men By These Presents:

That the Lumbermens Mutual Casualty Company, the American Motorists Insurance Company, and the American Manufacturers Mutual Insurance Company, corporations organized and existing under the laws of the State of Illinois, having their principal office in Long Grove, Illinois, (hereinafter collectively referred to as the "Company") do hereby appoint

Jeffrey Strassner, Marina Tapia, Christina Turman, Cesar F. Javier and B.A. Matson of Los Angeles, California (EACH) **********

their true and lawful agent(s) and attorney(s)-in-fact, to make, execute, seal, and deliver during the period beginning with the date of issuance of this power and ending on the date specified below, unless sooner revoked for and on its behalf as surety, and as their act and deed:

Any and all bonds and undertakings **********

EXCEPTION: NO AUTHORITY is granted to make, execute, seal and deliver any bond or undertaking which guarantees the payment or collection of any promissory note, check, draft or letter of credit.

This authority does not permit the same obligation to be split into two or more bonds in order to bring each such bond within the dollar limit of authority as set forth herein.

This appointment may be revoked at any time by the Company.

The execution of such bonds and undertakings in pursuance of these presents shall be as binding upon the said Company as fully and amply to all intents and purposes, as if the same had been duly executed and acknowledged by their regularly elected officers at their principal office in Long Grove, Illinois.

THIS APPOINTMENT SHALL CEASE AND TERMINATE WITHOUT NOTICE AS OF December 31, 2001

This Power of Attorney is executed by authority of resolutions adopted by the Executive Committees of the Boards of Directors of the Company February 23, 1988 at Chicago, Illinois, true and accurate copies of which are hereinafter set forth and are hereby certified to by the undersigned Secretary as being in full force and effect:

"VOTED, That the Chairman of the Board, the President, or any Vice President, or their appointees designated in writing and filed with the Secretary, or the Secretary shall have the power and authority to appoint agents and attorneys-in-fact, and to authorize them to execute on behalf of the Company, and attach the seal of the Company thereto, bonds and undertakings, recognizances, contracts of indemnity and other writings, obligatory in the nature thereof, and any such officers of the Company may appoint agents for acceptance of process."

This Power of Attorney is signed, sealed and certified by facsimile under and by authority of the following resolution adopted by the Executive Committee of the Boards of Directors of the Company at a meeting duly called and held on the 23rd day of February, 1988:

"VOTED, That the signature of the Chairman of the Board, the President, any Vice President, or their appointees designated in writing and filed with the Secretary, and the signature of the Secretary, the seal of the Company, and certifications by the Secretary, may be affixed by facsimile on any power of attorney or bond executed pursuant to resolution adopted by the Executive Committee of the Board of Directors on February 23, 1988 and any such power so executed, sealed and certified with respect to any bond or undertaking to which it is attached, shall continue to be valid and binding upon the Company."

In Testimony Whereof, the Company has caused this instrument to be signed and their corporate seals to be affixed by their authorized officers, this August 28, 2000.

Attested and Certified:

Lumbermens Mutual Casualty Company
American Motorists Insurance Company
American Manufacturers Mutual Insurance Company

Robert P. Hames

Robert P. Hames, Secretary

by

J. S. Kemper

J. S. Kemper, III, Exec. Vice President

STATE OF ILLINOIS
COUNTY OF LAKE SS

I, Irene Klewer, a Notary Public, do hereby certify that J. S. Kemper, III and Robert P. Hames personally known to me to be the same persons whose names are respectively as Exec. Vice President and Secretary of the Lumbermens Mutual Casualty Company, the American Motorists Insurance Company, and the American Manufacturers Mutual Insurance Company, Corporations organized and existing under the laws of the State of Illinois, subscribed to the foregoing instrument, appeared before me this day in person and severally acknowledged that they being thereunto duly authorized signed, sealed with the corporate seals and delivered the said instrument as the free and voluntary act of said corporations and as their own free and voluntary acts for the uses and purposes therein set forth.

"OFFICIAL SEAL"
Irene Klewer
Notary Public, State of Illinois
My Commission Expires Jan 28, 2002

My commission expires 1-28-02

Irene Klewer

Irene Klewer, Notary Public

CERTIFICATION

I, J.K. Conway, Corporate Secretary of the Lumbermens Mutual Casualty Company, the American Motorists Insurance Company, and the American Manufacturers Mutual Insurance Company, do hereby certify that the attached Power of Attorney dated August 28, 2000 on behalf of the person(s) as listed above is a true and correct copy and that the same has been in full force and effect since the date thereof and is in full force and effect on the date of this certificate; and I do further certify that the said J. S. Kemper, III and Robert P. Hames, who executed the Power of Attorney as Executive Vice President and Secretary respectively were on the date of the execution of the attached Power of Attorney the duly elected Executive Vice President and Secretary of the Lumbermens Mutual Casualty Company, the American Motorists Insurance Company, and the American Manufacturers Mutual Insurance Company.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed the corporate seal of the Lumbermens Mutual Casualty Company, the American Motorists Insurance Company, and the American Manufacturers Mutual Insurance Company on this

22nd day of May, 2001

Lumbermens Mutual Casualty Company — Long Grove, Illinois
American Manufacturers Mut. Ins. Co. — CORPORATE SEAL — 1927 — Illinois
American Motorists Insurance Company — AN ILLINOIS CORPORATION — Long Grove

J. K. Conway

J. K. Conway, Corporate Secretary

This Power of Attorney limits the acts of those named therein to the bonds and undertakings specifically named therein and they have no authority to bind the Company except in the manner and to the extent herein stated.

CLASS "B" APPLICATION/PERMIT — ISSUED UNDER SECTIONS 62.105 TO 62.116 INCLUSIVE, LOS ANGELES MUNICIPAL CODE **(SEE REVERSE HEREOF)**

DIST: ☐ CEN ☒ WLA ● HAR ☐ VAL

I HEREBY REQUEST PERMISSION TO CONSTRUCT THE IMPROVEMENTS DESCRIBED BELOW UNDER PRIVATE CONTRACT AND, IF PERMISSION IS GRANTED, I AGREE TO CONSTRUCT SAME IN ACCORDANCE WITH PLANS AND/OR SPECIFICATIONS APPROVED BY THE CITY ENGINEER. I ALSO ACKNOWLEDGE THAT I HAVE REVIEWED THE GENERAL INFORMATION PRESENTED ON THE REVERSE OF THIS APPLICATION, AND AGREE TO THE PROVISIONS STATED THEREON.

SHEET NO.	CHECKING NO.	CONSTRUCTION NO.
1 OF 1 SHEETS	BD- 401335	BC- 401367
	DATE ISSUED	DATE EXPIRES: 12-31-2001

PROJECT: EBPERGEN PROGRAM: 0400 ENGR DIST: REIMB FLG: Y OR ~~XX~~ DIR/INDR: D OR ~~XX~~

STREETS AND LIMITS TO BE IMPROVED
(SEE CONSTRUCTION TOTALS AT RIGHT)

Jefferson Boulevard S'LY from Lincoln Boulevard to Beethoven Street.

INDICATE SCOPE — PAVING, CURB, GUTTER, WALK, SEWERS, DRAINS, CATCH BASINS, LIGHTS, TREES, ETC.

Grade Vesting Tentative Tract 49104-01

2% 7%
Estimated Surcharge $4347 $15213

ENGR. PLAN CHECK DEPOSIT	NO. TREES	WELLS	TREE PLANTING FEE
$ 72,444			$

SANDBLASTING FEE	DOT SIGN DEPOSIT	TRAFFIC DEPOSIT
$	$	$

CONSTRUCTION-INSPECTION DEPOSIT	TOTAL FEE DEPOSIT
$ 144,888 Paid	$ 236,892 Paid

TYPE OF PROJECT	TOTAL BOND DEPOSIT*
Tract 49104-01	$5,315,500

IMPROVEMENT BOND NO.	BONDING PURPOSE
120124	Gen. Imp. Surety

LIABILITY INSURANCE NO.	LIAB. INSUR. EXPIR. DATE
000599	5-15-2003

PRIVATE ENGINEER
PSOMAS

STREET ADDRESS
11444 West Olympic Boulevard., Suite 750

CITY	ZIP CODE	TELEPHONE NO.
West Los Angeles	90064	310-954-3700

OWNER-APPLICANT (SEE REVERSE)
Playa Capital Company, LLC

STREET ADDRESS
12555 West Jefferson Bolevard., Suite 300

CITY	STATE	ZIP CODE
Los Angeles,	CA	90066

(AREA CODE) TELEPHONE NO.	DATE SIGNED BY APPLICANT
310- 822-0074	

SIGNATURE (SEE REVERSE SIDE BEFORE SIGNING)

APPLICANT'S NAME (TYPE OR PRINT, ADD TITLE IF OFFICER)

DISTRICT/DIVISION OFFICE	ISSUED BY:
WLA / ENGR.	
TIME	DATE

DISTRICT MAP NO.	DIVISION INDEX	DRAINAGE MAP	COUNCIL DIST.
99-B-157		560	6

PROPOSED R/W NO. | SPECIAL REFERENCES

CHECKING & CONSTRUCTION

CONSTRUCTION ITEMS	ESTIMATED COST
GRADING	$ 4,199,700
PAVING, CURB/ GUT./SDWLK.	$
SEWER	$
STORM DRAIN	$
STREET LIGHTS	$
TRAFFIC SIGNALS	$
Subtotal	$ 4,199,700
+ 15 % PCF	$ 6,629,900
CONSTRUCTION ESTIMATE	$ 4,829,600
+10 % CIF	$ 482,900
PLAN ESTIMATE*	$ 5,315,500
BOND ESTIMATE	$ 5,315,500

APPROVED-ENGINEER IN CHARGE

DATE 10/31/01

Mike Patonai For

DIST. ENGR.

REGISTER RECEIPT VALIDATION

PERMIT TITLE (INCLUDE TRACT, PMLA, CPC, ZA OR PVT. ST. NUMBER, OR R3)

TRACT 49104-01
PLAYA VISTA DEVELOPMENT PHASE I
(ST. Grading Improvements)

ENG. 3.659-A – (Rev. 7/87)
DEPARTMENT OF PUBLIC WORKS
City of Los Angeles

CLASS "B" APPLICATION/PERMIT — ISSUED UNDER SECTIONS 62.105 TO 62.116 INCLUSIVE, LOS ANGELES MUNICIPAL CODE (SEE REVERSE HEREOF)

DIST: ☐ CEN ☒ WLA ☐ HAR ☐ VAL

I HEREBY REQUEST PERMISSION TO CONSTRUCT THE IMPROVEMENTS DESCRIBED BELOW UNDER PRIVATE CONTRACT AND, IF PERMISSION IS GRANTED, I AGREE TO CONSTRUCT SAME IN ACCORDANCE WITH PLANS AND/OR SPECIFICATIONS APPROVED BY THE CITY ENGINEER. I ALSO ACKNOWLEDGE THAT I HAVE REVIEWED THE GENERAL INFORMATION PRESENTED ON THE REVERSE OF THIS APPLICATION, AND AGREE TO THE PROVISIONS STATED THEREON.

SHEET NO.	CHECKING NO.	CONSTRUCTION NO.
1 OF 1 SHEETS	BD-401335	BC- 401367
	DATE ISSUED 5-22-98	DATE EXPIRES 5-22-00

PROJECT: EBPERGEN PROGRAM: 0400 ENGR DIST: E620-1850 REIMB FLG: Y DIR/INDR: D

STREETS AND LIMITS TO BE IMPROVED
(SEE CONSTRUCTION TOTALS AT RIGHT)

Jefferson Boulevard S'LY from Lincoln Blvd.
to Beethoven Street

2% 7%
Estimated Surcharge $4347 $15213

INDICATE SCOPE — PAVING, CURB, GUTTER, WALK, SEWERS, DRAINS, CATCH BASINS, LIGHTS, TREES, ETC.

Grade Vesting Tentative Tract 49104-01

ENGR. PLAN CHECK DEPOSIT	NO. TREES	WELLS	TREE PLANTING FEE
$ 72,444			$
SANDBLASTING FEE	DOT SIGN DEPOSIT	TRAFFIC DEPOSIT	
$	$	$	
CONSTRUCTION-INSPECTION DEPOSIT		TOTAL FEE DEPOSIT	
$ 144,088		$ 236,892	
TYPE OF PROJECT		TOTAL BOND DEPOSIT*	
Tract 49104-01		$5,315,500	
IMPROVEMENT BOND NO.		BONDING PURPOSE	
120124		Gen. Imp. Surety	
LIABILITY INSURANCE NO.		LIAB. INSUR. EXPIR. DATE	
000599		10-16-98	

PRIVATE ENGINEER: Psomas & Associates

STREET ADDRESS: 3420 Ocean Park Boulevard

CITY: Santa Monica | ZIP CODE: 90405 | TELEPHONE NO.: (310)450-1217

OWNER-APPLICANT (SEE REVERSE): Playa Capital Co., LLC

STREET ADDRESS: 13250 Jefferson Boulevard

CITY: Los Angeles | STATE: CA | ZIP CODE: 90094

(AREA CODE) TELEPHONE NO.: (310)822-0074 | DATE SIGNED BY APPLICANT

SIGNATURE (SEE REVERSE SIDE BEFORE SIGNING)

APPLICANT'S NAME (TYPE OR PRINT, ADD TITLE OF OFFICER)

DISTRICT OFFICE: WLA R. | ISSUED BY: Phong Nguyen

DISTRICT MAP NO.	DIVISION INDEX	DRAINAGE MAP	COUNCIL DIST.
99-B-157		560	6
PROPOSED R/W NO.	SPECIAL REFERENCES		

CHECKING & CONSTRUCTION

CONSTRUCTION ITEMS	ESTIMATED COST
GRADING	$ 4,199,700
PAVING, CURB/ GUT./SDWLK.	$
SEWER	$
STORM DRAIN	$
STREET LIGHTS	$
TRAFFIC SIGNALS	$
Subtotal	$ 4,199,700
+ 15 % PCF	$ 6,629,900
CONSTRUCTION ESTIMATE	$ 4,829,600
+ 10 % MISC	$ 482,900
PLAN ESTIMATE	$ 5,315,500
BOND ESTIMATE	$ 5,315,500

0950B/50010 CHK 2360312 C

REGISTER RECEIPT VALIDATION

APPROVED-ENGINEER IN CHARGE

DATE: 5/26/98

PERMIT TITLE (INCLUDE TRACT, PMLA, CPC, ZA OR PVT. ST. NUMBER, OR RJ)

TRACT 49104-01
PLAYA VISTA DEVELOPMENT PHASE I
(ST. GRADING IMPROVEMENTS)

ENG 3593-A (Rev. 7-87)
DEPARTMENT OF PUBLIC WORKS
City of Los Angeles

Eng. 3.81. (Rev. 2/86)
O & W 3J/50

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
Office of the City Engineer

WEST LOS ANGELES
District/Division Design Office
Council District No. 6
Permit No. BC401367
Date Issued: April 14,2000

(For City Engineer's Stamp)

APPROVED FOR THE
CITY ENGINEER BY
BOND CONTROL
DEVELOPMENT SERVICES DIV

YOUR COPY

3SM91392100
Surety Bond No.

CA- 120124
Attach To City Attorney No.

(For City Attorney's Stamp)

APPROVED
JAMES K. HAHN
CITY ATTORNEY

MAY 30 2000

ATTACH TO 120124

GENERAL BOND RIDER

WHEREAS, under the date May 22,1998, I-we BY
PLAYA CAPITAL COMPANY,LLC, A DELAWARE LIMITED LIABILITY COMPANY
as Principal,
and AMERICAN MOTORISTS INSURANCE COMPANY as Surety,
executed in favor of the City of Los Angeles, a certain bond in the sum of
Five Million Three Hundred Fifteen Thousand Five Hundred & No/100
Dollars ($ 5,315,500.00) guaranteeing construction of
certain public improvements located at-in JEFFERSON BL SLY., FROM LINCOLN BL TO BEETHOVEN ST.
(PLAYA VISTA DEVELOPMENT STREET GRADING IMPROVEMENTS TRACT 49104-01)
to be completed on or before , 19, and

WHEREAS, the Prinicpal and Surety have agreed to amend said bond by extending the time within which to construct and complete said public improvements, and

WHEREAS, the Obligee is willing to accept said amendments, as agreed,

NOW THEREFORE, it is agreed by the undersigned Principal and Surety on said bond that the time for performance shall hereby be extended to on or before May 30,2001
and the face amount of the bond is hereby reduced to One Million Sixty Three Thousand
& No/100 ($ 1,063,000.00)

and it is hereby expressly agreed that the effective date of this Rider is the date of its acceptance by the City, and all other terms and conditions shall remain the same as originally written.

(SIGNATORIES AND ACKNOWLEDGMENTS ON REVERSE HEREOF)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of Los Angeles } ss.

On April 27, 2000 (Date), before me, Judy Swank (Name and Title of Officer (e.g., "Jane Doe, Notary Public")),
personally appeared Bruce D. Harrigan and Randy Johnson (Name(s) of Signer(s)),

☒ personally known to me
☐ proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) ~~is~~/are subscribed to the within instrument and acknowledged to me that ~~he/she~~/they executed the same in ~~his/her~~/their authorized capacity(ies), and that by ~~his/her~~/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

J. SWANK
Commission # 1236194
Notary Public - California
Los Angeles County
My Comm. Expires Oct 2, 2003

Place Notary Seal Above

Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer

Signer's Name: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

☐ Individual
☐ Corporate Officer — Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney in Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: _____

Signer Is Representing: _____

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CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Los Angeles

On May 12, 2000 before me, Marina Tapia, Notary Public

personally appeared Christina Turman

☒ personally known to me - OR - ☐ proved to me on the basis of satisfactory evidence the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

MARINA TAPIA
Commission # 1206435
Notary Public - California
Los Angeles County
My Comm. Expires Dec 31, 2002

Notary Public Seal

WITNESS my hand and official seal.

Marina Tapia
SIGNATURE OF NOTARY

OPTIONAL

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

DESCRIPTION OF ATTACHED DOCUMENT:

TITLE OR TYPE OF DOCUMENT: _____

DOCUMENT DATE: _____

CAPACITY(IES) CLAIMED BY SIGNER(S)

Signer's Name: _____	**Signer's Name** _____
☐ INDIVIDUAL	☐ INDIVIDUAL
☐ CORPORATE OFFICER	☐ CORPORATE OFFICER
Title(s) _____	Title(s) _____
☐ PARTNER(S) ☐ LIMITED ☐ GENERAL	☐ PARTNER(S) ☐ LIMITED ☐ GENERAL
X ATTORNEY-IN-FACT	☐ ATTORNEY-IN-FACT
☐ TRUSTEE(S)	☐ TRUSTEE(S)
☐ GUARDIAN/CONSERVATOR	☐ GUARDIAN/CONSERVATOR
☐ OTHER: _____	☐ OTHER: _____
Signer is representing:	**Signer is representing:**
NAME OF PERSON(S) OR ENTITY(IES)	NAME OF PERSON(S) OR ENTITY(IES)
_____	_____

KEMPER.

Insurance Companies
Commercial Lines Group

AMERICAN MOTORISTS INSURANCE COMPANY

Home Office: Long Grove, IL 60049

POWER OF ATTORNEY
Know All Men By These Presents:

That the American Motorists Insurance Company, a corporation organized and existing under the laws of the State of Illinois, and having its principal office in Long Grove, Illinois, does hereby appoint

Jeffrey Strassner Christina Turman

its true and lawful agent(s) and attorney(s)-in-fact, to make, execute, seal, and deliver during the period beginning with the date of issuance of this power and ending December 31, 2001, unless sooner revoked for and on its behalf as surety, and as its act and deed:

Name of Principal: Playa Capital Company, LLC, A Delaware Limited Liability Company

Bond No.: 3SM91392100 Penal Sum: $ 5,315,500.00

Name of Obligee: City of Los Angeles

Description: Subdivision Bond

EXCEPTION: NO AUTHORITY is granted to make, execute, seal and deliver any bond or undertaking which guarantees the payment or collection of any promissory note, check, draft or letter of credit.

This authority does not permit the same obligation to be split into two or more bonds in order to bring each such bond within the dollar limit of authority as set forth herein.

This appointment may be revoked at any time by the American Motorists Insurance Company.

The execution of such bonds and undertakings in pursuance of these presents shall be as binding upon the said American Motorists Insurance Company as fully and amply to all intents and purposes, as if the same had been duly executed and acknowledged by its regularly elected officers at its principal office in Long Grove, Illinois.

THIS APPOINTMENT SHALL CEASE AND TERMINATE WITHOUT NOTICE AS OF DECEMBER 31, 2001.

This Power of Attorney is executed by authority of a resolution adopted by the Executive Committee of the Board of Directors of said American Motorists Insurance Company on February 23, 1988 at Long Grove, Illinois, a true and accurate copy of which is hereinafter set forth and is hereby certified to by the undersigned Secretary as being in full force and effect:

"VOTED, That the Chairman of the Board, the President, or any Vice President, or their appointees designated in writing and filed with the Secretary, or the Secretary shall have the power and authority to appoint agents and attorneys-in-fact, and to authorize them to execute on behalf of the Company, and attach the seal of the Company thereto, bonds and undertakings, recognizances, contracts of indemnity and other writings, obligatory in the nature thereof, and any such officers of the Company may appoint agents for acceptance of process."

This Power of Attorney is signed, sealed and certified by facsimile under and by authority of the following resolution adopted by the Executive Committee of the Board of Directors of the Company at a meeting duly called and held on the 23rd day of February, 1988:

"VOTED, That the signature of the Chairman of the Board, the President, any Vice President, or their appointees designated in writing and filed with the Secretary, and the signature of the Secretary, the seal of the Company, and certifications by the Secretary, may be affixed by facsimile on any power of attorney or bond executed pursuant to resolution adopted by the Executive Committee of the Board of Directors on February 23, 1988 and any such power so executed, sealed and certified with respect to any bond or undertaking to which it is attached, shall continue to be valid and binding upon the Company."

In Testimony Whereof, the American Motorists Insurance Company has caused this instrument to be signed and its corporate seal to be affixed by its authorized officers, this 26th day of July , 19 93.

Attested and Certified:

AMERICAN MOTORISTS INSURANCE COMPANY

Robert P. Hames

Robert P. Hames, Secretary

J. S. Kemper III

J. S. Kemper, III, Exec, Vice President

NOTE: ANY ERASURES OR WHITE OUT WILL VOID THIS POWER OF ATTORNEY.

13250 W Jefferson Blvd

Permit #: (2) 05030 - 10000 - 01376
Plan Check #: G05LA0092 Printed: 05/18/05 02:01 PM
Event Code:

Grading
Commercial
Regular Plan Check
Plan Check Submittal

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 05/18/2005

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
TR 6265		96		M B 134-41/44	105B161 887	- -
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 341.850	441	D C C 2722 C F 64	099B157 3	4211 - 013 - ***
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 300' Height Limit Above Elevatio
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.01
Census Tract - 2770.00
Energy Zone - 6
Hillside Grading Area - YES
Earthquake-Induced Liquefaction Area - Yes
Methane Hazard Site - Methane Zone
Near Source Zone Distance - 5.2
Parcel Map Ex. - PMEX-3533
Thomas Brothers Map Grid - 672-G6

ZONE(S): M(PV) /

4. DOCUMENTS

ZI - ZI-1320 Playa Vista (Area D)
ZI - ZI-1802 Hillside Grading Ordinance
ZI - ZI-1874 LA Coastal Transportation
ZA - ZA-1990-497-PAD
ZA - ZA-2000-4565-CU
SPA - Los Angeles Coastal Transportatic
SPA - Playa Vista (Area D)
ORD - ORD-160523
CPC - CPC-1985-272-PA
AFF - AF-04-2062230
AFF - AF-90-646107-LT
AFF - AF-90-648107-LT
AFF - AF-91-1539660-MB
AFF - AF-91-751921-TT

5. CHECKLIST ITEMS

LA Department of Building and Safety
LA 01 26 134859 05/18/05 02:30PM

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Company, Llc 5510 Lincoln Blvd 100 PLAYA VISTA CA 90094

Tenant:
Applicant: (Relationship: Agent for Owner)
Moe Lahooti - (310) 564-3591

MAJOR PROJECTS REVIEW $2,275.
Total Due: $2,275.
No Fee: $2,275.
NO FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 13250 W. JEFFERSON BLVD
Auth: WAIVED FEE LETTER

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

ADD 6,500 C. Y. TO PREVIOUSLY APPROVED STOCKPILE OF 1,052,000 C. Y. FOR A TOTAL OF 1,058,500 C. Y. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510.

9. # Bldgs on Site & Use: VACANT

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000 (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Truong Huynh DAS PC By:
OK for Cashier: Truong Huynh Coord. OK:
Signature: Date:

For Cashier's Use Only W/O #: 53001376

Project: PLAYA VISTA

PLAN MAINTENANCE	$45.
SYSTEMS DEVT FEE	$139.
CITY PLANNING SURCH	$139.
MISCELLANEOUS	$5.
ONE STOP SURCH	$46.
Total Due:	$375.
Check:	$375.

CSLA 75016

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 6,500 cu yd PC Valuation:

FINAL TOTAL Grading	2,650.37
Permit Fee Subtotal Grading	2,275.00
Plan Check Subtotal Grading	0.00
Plan Maintenance	45.50
O.S. Surcharge	46.41
Sys. Surcharge	139.23
Planning Surcharge	139.23
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS

plot plan

P05030100000013 76FY

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashier only

05LA 75016
05/18/05 14:27:33
LA01 T-134858 C 26
05030-10000-01374

PERMIT # | | | | | | - | | | | | | - | | | | | |

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		
FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		
ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		
POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		
FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

AQMD Sign-Off Required ☐ YES ☐ NO

FOR INSPECTION REQUESTS, PLEASE CALL
1- (888) - LA-4-BUILD (524-2845)

City of Los Angeles — Department of Building and Safety

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY: [illegible]

FILE NO. 8817

DISTRIBUTION

- [x] Owner
- [x] Petitioner
- [ ] Fire
- [ ] Health
- [ ] ..... Pl Ck.
- [x] W.L.A. ..... Insp.
- [ ] ..... Bur.
- [ ] PV ES, E14, E19

JOB ADDRESS: 6775 Centiela Ave

LOT(S): 2, 3 | BLK: IPCC0201.68

TRACT: 12672

Owner: Playa Capital LLC

Address: 12555 W. Jefferson #300 LA, CA Zip: 90066

Daytime Phone (310) 822 0074

1

Petitioner: Pyomas

Address: 11444 W. Olympic Blvd #750 Los Angeles, CA Zip: 90064

Daytime Phone (310) 95

District Office: W.L.A.
Plan Ck No.:
Zone:
Permit No.: 98LA78695
Job Order No.:
Bureau/Division: Engr/Grading
Use of Bldg.: Stock Pile
Job Status:
Type:
Stories:
Occ.:
No. Units:
F.D.:
D.M.: 105B165
C.D.: 6

- [ ] YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
- [ ] POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
- [ ] SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Allow extra temporary stock pile (9,500 C.Y) addition to the existing stock pile (See attached modification # 8247, dated 9, 6, 2000).

Dept. Comment: Stockpile

Code Sections: L.A.M.C. – 91.7011.3

Title 24 –

JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Temporary stock pile for Landscaping Screen and Erosion Control devises. For Location of 9,500 CY stock pile see attached plot plan.

Petitioner's Signature: [signature] Position: For Pyomas, Moe Lahoot Date: 5.18.2001

Reviewed By: [signature] Date: 5/18/01

DEPARTMENT ACTION: In accordance with [ ] Sect. 98.0403 L.A.M.C. [ ] Sect. 17951d H. & S.C. [ ] Sect. 19957 H. & S.C.

The Request is [x] Granted (See attached letter). ~~[ ] Denied~~ (See reverse for appeal information.)

- [ ] Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
- [x] Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
- [ ] Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By: [signature] Date: 5/22/01

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval, only removing existing berm (1000 cu yds) and placing new stockpile per attached detail (9500 cy)
2. This permit and modification shall expire the same day log 8247 expires (Sept 25, 2001).

LA Department of Building and Safety
LA 01 17 028077 05/18/01 03:32PM

BOARD APPLIC FEE $100.00

Total Due: $100.00
Check: $100.00
(Cashier Use Only)

No. of Items: 1
Fee due: 100
Fee verified: B.C.

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

6775 W Centinela Ave

Permit Application #:

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

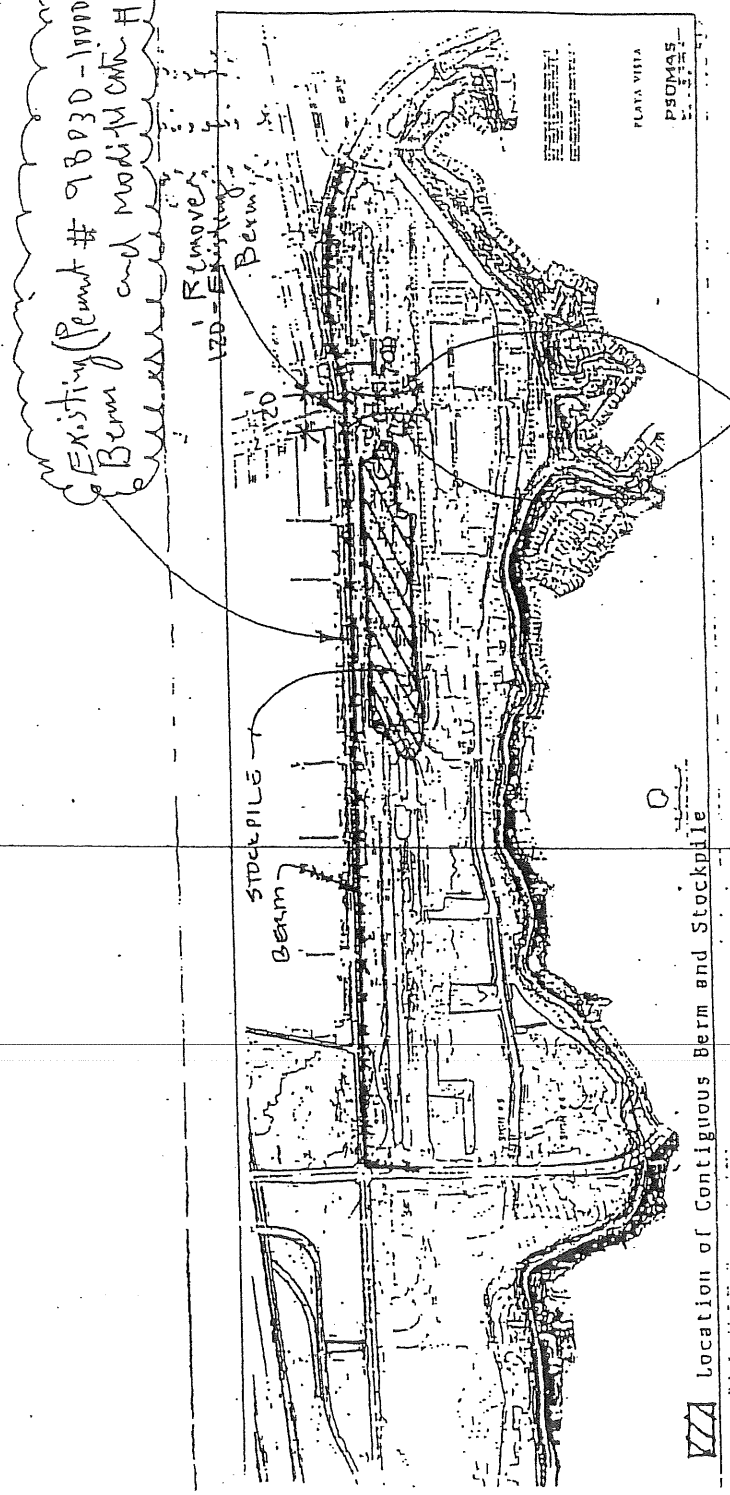
Initiating Office: METRO

Over the Counter Permit

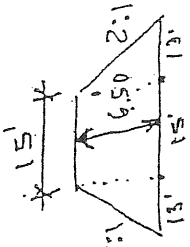
PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



$\left(\frac{41' + 15'}{2}\right) \times 6.50 \times 2 \times 700 = 9,198$ C.Y.



MOE Lahooti / Ron Psomas
(310) 564-3591

COUNCIL DISTRICT: 6

PLOT PL

City of Los Angeles — Department of Building and Safety

FILE NO. 9158 (6)

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

DISTRIBUTION

☒ Owner	☐		Pl Ck.
☒ Petitioner	☒		Insp.
☐ Fire	☐		Bur.
☐ Health	☐		

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2, 3 BLK

TRACT 12672

District Office W. L.A. Type

Plan Ck No. Stories

Zone Occ.

Permit No. 01 LA 13223 No. Units

Job Order No. F.D.

Bureau/Division Grading D.M. 105 B165

Use of Bldg. Berm C.D. 6

Job Status "Stock Pile"

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-S) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

1

Owner Playa Capital LLC

Address 12555 W. Jefferson #300

Los Angeles, CA Zip 90066

Daytime Phone (310) 822-0074

Petitioner Thomas

Address 11444 W. Olympic Blvd #750

W. Los Angeles, CA Zip 90064

Daytime Phone (310) 954-3700 x. 4404

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Time extension of Temporary Stock Pile "Berm" 9,500 C.Y. Permodify Case #8817 dated 5/22/01 and Grading Permit # 01 LA 13223.

Dept. Comment Extension of time

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

To extend the expiration date to match the expiration date of the original permit for "Berm" Per modify case # 9135 dated 9/26/01.

Petitioner's Signature [signature] Position Engineer Date 10/1/2001

Reviewed By Date

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ~~☐ Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) ( ) Dept. is required.

☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By Eric Caldera 9/26/01

LA Department of Building and Safety

LA 03 07 049562 10/03/01 03:11PM

BOARD APPLIC FEE $100.00

Total Due: $100.00

No Fee: $100.00

NO FEE NO FEE NO FEE

(Cashier Use Only)

Name: PLAYA VISTA

Addr: 6775 CENTINELA AV

No. of Items

Auth: PROCESSING FORM $100.00

Dept: Fee verified

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year (Sept 26, 2002)

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-882) – Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R1/88)

Area D

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 10089

DISTRIBUTION

☒ Owner ☐ ..... Pl Ck.
☒ Petitioner ☐ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2 & 3 BLK

TRACT 12672

1

Owner Playa Capital Company, LLC
Address 12555 W. Jefferson Blvd #300
Los Angeles, CA Zip 90066
Daytime Phone (310) 822-0074

Petitioner Pioneer
Address 11444 W. Olympic Blvd #300
W. Los Angeles, CA Zip 90064
Daytime Phone (310) 954-3700 Moe

District Office W.L. Type
Plan Ck No. 01LA13223 Stories
Zone Occ.
Permit No. 01LA13223 No. Units
Job Order No. F.D.
Bureau/Division D.S. D.M. 105 B165
Use of Bldg. Erosion Control C.D. CA
Job Status Existing

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of Time to allow temporary Existing Stockpile & Berm 9,500 CY per Grading Permit #01 LA 13223 and approved modifications #8817 & #9158.

Dept. Comment Extension of Time

Code Sections: L.A.M.C.— 91.7011.3

Title 24—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

To extent the expiration date of this Permit to match the expiration date of the original Permit for Stock Pile, Berm per modification #9135 dated 9/26/01

Petitioner's Signature [signature] Position For Pioneer Date 9/19/02

Reviewed By [signature] Date 9/20/02

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide [signature]
(EQUIVALENCY) (EQUIVALENT FACILITATION)

10/3/02

Department Action By Department of Building Dated Safety

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No Grading work is included in this approval
2. Extension of Time for One Year (Sep 26, 2003)

LA 05 27 083548 09/20/02 11:17AM
BOARD APPLIC FEE $100.00
Total Due: $100.00
No Fee: $100.00
NO FEE, NO FEE, NO FEE
Name: PLAYA CAPITAL (Cashier Use Only)
Addr: 6775 CENTINELA AVE
Auth: P No. of Items 1
Dept: P Fee due $100
Fee verified [signature]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (11/88)

6775 W Centinela Ave

Permit #: 98030 - 10001 - 01912
Plan Check #:
Printed: 05/24/01 03:20 PM
Event Code:

Grading

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 05/24/2001

Over the Counter Permit

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
RANCHO SAUSAL REDO		LT 38 T2S R14W	441	PAT 1-507/508	105B165 538	4211 - 011 - 023

3. PARCEL INFORMATION
No-Zone Permit -
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Census Tract - 2770.000
District Map - 105B165
Energy Zone - 6
Thomas Brothers Map Grid - 672

ZONE(S):

4. DOCUMENTS

5. CHECKLIST ITEMS
LA 03 02 039524 05/24/01 03:37PM
CEQA - CEQA Exempted09/04/98

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION
LA 03 02 039524 05/24/01 03:37PM
Owner(s):
Playa Capital Co Llc 12555 Jefferson Blvd STE 300 LOS ANGELES CA 90066

Tenant:

Applicant: (Relationship: Agent for Owner)
- Psomas & Assoc 3420 Ocean Park Blvd #1040 SANTA MONICA, CA 90405 (310) 450-1217

7. EXISTING USE	PROPOSED USE	8. DESCRIPTION OF WORK
	60 Grading - Non-Hillside	1,000 cu yds removal from berm 9500 cu yds for new stockpile per modification. supplemental to 98030 -10000-01912

9. # Bldgs on Site & Use: VACANT, STOCKPILE

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By: Eric Cabrera
OK for Cashier: Eric Cabrera
Signature:
DAS PC By:
Coord. OK:
Date:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

For Cashier's Use Only
LA Department of Building and Safety
LA 03 02 039524 05/24/01 03:37PM W/O # 8300912

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period
Permit Valuation: 9,500 cu yd PC Valuation: 300 cu yd

FINAL TOTAL Grading	3,459.32
Permit Fee Subtotal Grading	2,725.00
Plan Check Subtotal Grading	387.00
O.S. Surcharge	62.24
Sys. Surcharge	186.72
Planning Surcharge	93.36
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

GRADING PLAN CHECK	$387.0
GRADING PERMIT	$2,725.0
Total Due:	$3,112.0
No Fee:	$3,112.0

NO FEE NO FEE NO FEE
Name: PLAYA CAPITAL CO LLC
Addr: 6775 W CENTINELA AVE
Auth: PLAYA VISTA PROJECT
Dept: CP/PLAYA VISTA AGREE

01LA 13223
LA Department of Building and Safety
LA 03 02 039525 05/24/01 03:39PM

SYSTEMS DEVT FEE	$186.7
ONE STOP SURCH	$62.2
CITY PLANNING SURCH	$93.3
MISCELLANEOUS	$5.0
Total Due:	$347.3
CK	$347.3

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS
Misc. (See Comments)
Plot Plan

City of Los Angeles - Department of Building and Safety

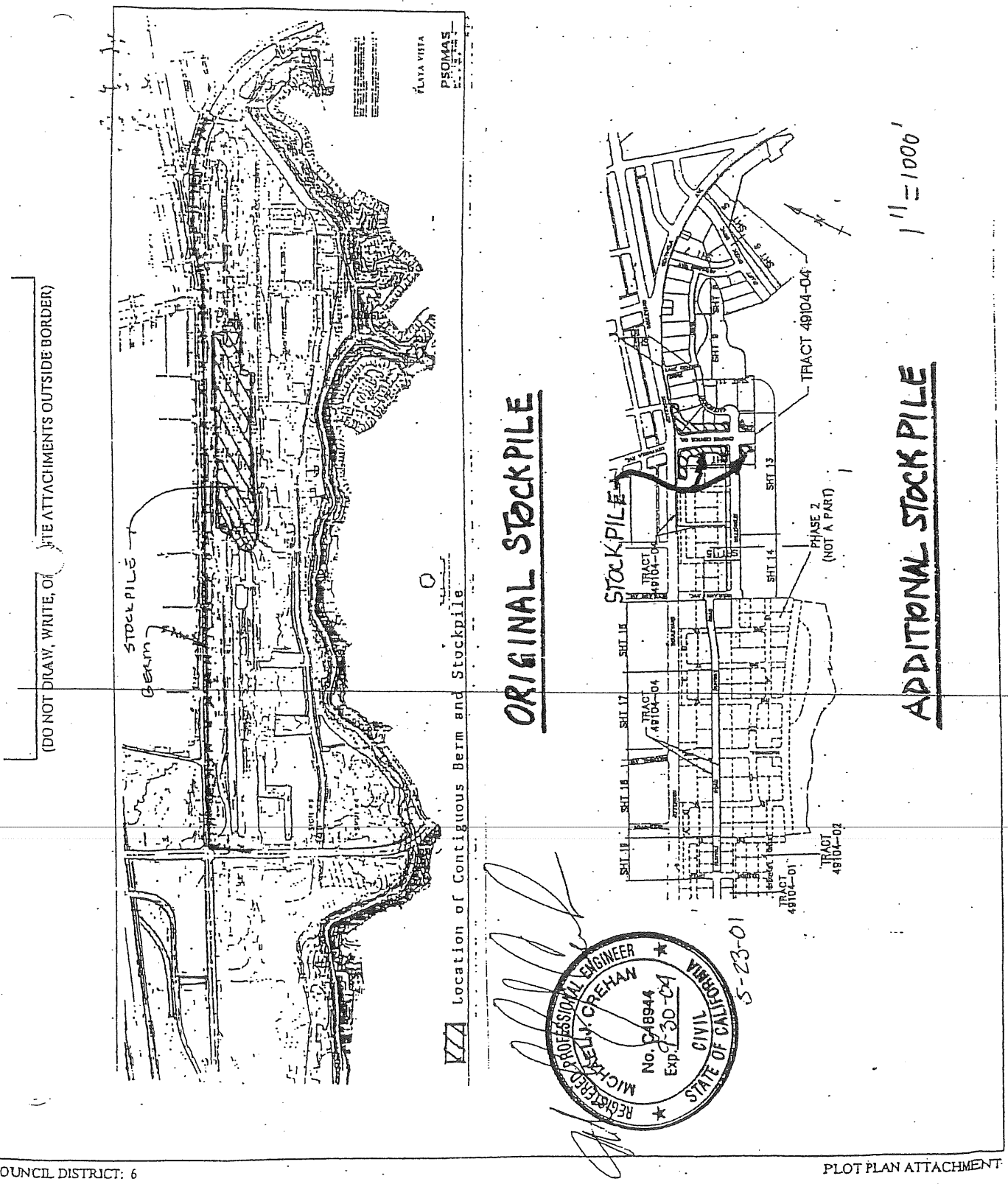
Initiating Office: METRO

Back Room Plan Check

PLOT PLAN ATTACHMENT

Printed on:

(DO NOT DRAW, WRITE, OR ATTACHMENTS OUTSIDE BORDER)



COUNCIL DISTRICT: 6

PLOT PLAN ATTACHMENT

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashiering only

01LA 13223
05/24/01 15:37:44
LA03 T-039524 C 02
98030-10001-01912

PERMIT # _____-_____-_____

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		

FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		

GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		

ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

FOR INSPECTION REQUESTS, PLEASE CALL
1- (888) - LA-4-BUILD (524-2845)

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		

POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		

FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

AQMD Sign-Off Required ☐ YES ☐ NO

DEPARTMENT OF BUILDING AND SAFETY - CITY OF LOS ANGELES

APPROVED

This set of plans and specifications MUST be at job site during construction. It is unlawful to alter or change same, or to deviate therefrom, without approval from the Dept. of Building & Safety.

The stamping of this plan and specifications SHALL NOT be held to permit or to be an approval of the violation of any provisions of any City Ordinance or State Law.

This approval does not cover ELECTRICAL, PLUMBING, HEATING, or REFRIGERATION work. Separate approvals must be obtained from the respective divisions.

BY Eric CABRERA

DATE 5/24/01

PERMIT NO. 01LA

98030-10001-01912

City of Los Angeles — Department of Building and Safety

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY: [illegible]

FILE NO. 8817

DISTRIBUTION

- [x] Owner
- [x] Petitioner
- [ ] Fire
- [ ] Health
- [ ] ..... Pl Ck.
- [x] W.L.A. ..... Insp.
- [ ] ..... Bur.
- [ ] .....

JOB ADDRESS: 6775 Centiela Ave

LOT(S): 2, 3 | BLK:

TRACT: 12672

1

Owner: Playa Capital LLC

Address: 12555 W. Jefferson #300 LA, CA Zip: 90066

Daytime Phone (310) 822 0074

Petitioner: Psomas

Address: 11444 W. Olympic Blvd #750 Los Angeles, CA Zip: 90064

Daytime Phone (310) 95

District Office: W.L.A.

Plan Ck No.:

Zone:

Permit No.: 98LA78695

Job Order No.:

Bureau/Division: Engr/Grading

Use of Bldg.: Stock Pile

Job Status:

Type:

Stories:

Occ.:

No. Units:

F.D.:

D.M.: 105B165

C.D.: 6

- [ ] YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
- [ ] POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
- [ ] SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Allow extra Temporary Stock Pile (9,500 C.Y) addition to the existing Stock Pile (See attached modification # 8247, dated 9, 6, 2000).

Dept. Comment: Stockpile

Code Sections: L.A.M.C. — 91.7011.3

Title 24 —

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Temporary Stock Pile for Landscaping Screen and Erosion Control devises. For Location of 9,500 CY Stock Pile see attached Plot plan.

Petitioner's Signature: M. [signature] Position: For Psomas, Mve Lahoot Date: 5.17.2001

Reviewed By: [signature] Date: 5/18/01

DEPARTMENT ACTION: In accordance with [ ] Sect. 98.0403 L.A.M.C. [ ] Sect. 17951d H. & S.C. [ ] Sect. 19957 H. & S.C.

The Request is [x] Granted (See attached letter). ~~[ ] Denied~~ (See reverse for appeal information.)

- [ ] Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
- [x] Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
- [ ] Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By: [signature] Date: 5/22/01

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval, only removing existing berm (1000 cu.yds) and placing new stock pile per attached detail (9500 cy)
2. This permit and modification shall expire the same day log 8247 expires (Sept 25, 2001).

LA Department of Building and Safety
LA 01 17 028077 05/18/01 03:32PM

BOARD APPLIC FEE $100.00

Total Due: $100.00

Check: $100.00
(Cashier Use Only)

No. of Items: 1

Fee due: 100

Fee verified: B.C.

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

6775 W Centinela Ave

Permit Application #: [illegible]

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

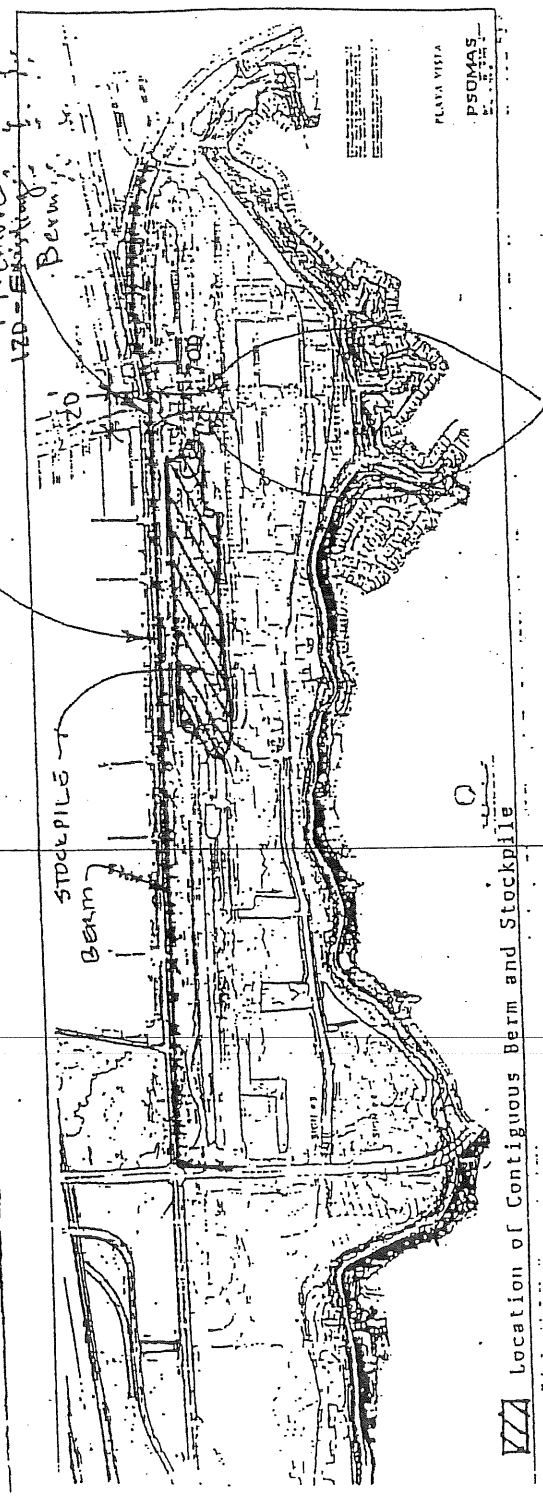
Initiating Office: METRO

Over the Counter Permit

PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:

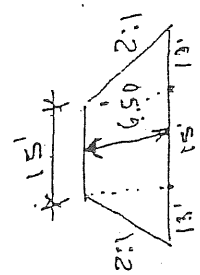
(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



Existing Permit # 98030-10000-01912 Berm and Modified Cat. # 8247

Remove 120' Existing Berm

Proposed Berm Additional Existing Per Detail (1) (9,000 cy) Berm



$\frac{(41'+15')}{2} \times 6.50' \times 2 \times 700' = 9,838$ CY

MOE Lahooti / For Psomas (310) 5643591

COUNCIL DISTRICT: 6

PLOT PLAN

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

DISTRIBUTION [redacted] 024

- [x] Owner
- [x] Petitioner
- [ ] Fire
- [ ] Health
- [ ] Pl Ck.
- [x] W. LA Insp.
- [ ] Bur.

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 BLK

TRACT 12472

Owner Playa Capital Company, LLC

Address 12555 W. Jefferson Blvd, Suite 300 Los Angeles, CA Zip 90066

Daytime Phone (310) 822 0074

1

Petitioner P. Somas

Address 11444 W. Olympic Blvd #750 W. Los Angeles, CA Zip 90064

Daytime Phone (310) 954 3745

District Office W. LA

Plan Ck No.

Zone

Permit No. 98LA78645

Job Order No.

Bureau/Division Building & Safety

Use of Bldg. Stock Pile "Berms"

Job Status

Type

Stories

Occ.

No. Units

F.D.

D.M. 105 B165

C.D. 6

- [ ] YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
- [ ] POSTCARD (COM-8) NAME/ADDRESS COMPLETED BY PETITIONER
- [ ] SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stock pile (100,000 CY) and existing screening / erosion control berm (60,000 CY). (See attached plot plan for location & copy of original modification 6643 and modification 7455).

Dept. Comment Extension of Time

Code Sections: L.A.M.C. – 91.7011.3

Title 24 –

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading work for all area of project is not finished. Existing berm is crossing several different phases of the project.

Petitioner's Signature Moe Lahooti for Psomas Position Consultant Date 9/06/2000

Reviewed By Date

DEPARTMENT ACTION: In accordance with [ ] Sect. 98.0403 L.A.M.C. [ ] Sect. 17951d H. & S.C. [ ] Sect. 19957 H. & S.C.

The Request is [x] Granted (See attached letter). [ ] Denied (See reverse for appeal information.)

- [ ] Written concurrence from the (Fire) (Transportation) (Health) ( ) Dept. is required.
- [x] Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
- [ ] Condition (DOES) (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 9-25-0

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year.

LA Department of Building and Safety
LA 04 10 018228 09/06/00 04:40PM

BOARD APPLIC FEE $100

Total Due: $100

No Fee: $100

(Cashier Use Only)

NO FEE NO FEE NO FEE

Name: PLAYA VISTA

Addr: 6775 CENTINELA AV

Auth: FEE WAIVER 100.00

Dept: PLAYA VISTA

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832). – Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/8

PSOMAS

Information and Engineering Solutions

May 18, 2001

Mr. David Hsu
Department of Building and Safety
Grading Division – 3rd Floor, Counter I
201 Figueroa Street
Los Angeles, CA 90012

Subject: Playa Vista – Jefferson Blvd. Screening Berm Stockpile

Dear Mr. Hsu:

We are requesting that a modification be issued to adjust the configuration and location of a portion of an existing stockpile along the south side of Jefferson Boulevard at Campus Center Drive within the Playa Vista development. This existing stockpile was permitted, and is in place, to serve two purposes. First, it provides a visual screen of the construction activity from the motoring public on Jefferson and Centinela, and from the residences and businesses on the opposite side of the street. Second, it acts to control erosion by limiting the amount of potential sediment runoff. With the Campus Center Drive improvements for Tract 49104-04 under construction, we are requesting that this stockpile berm be modified to serve the same functions for this street. A plot plan was provided indicating the requested configuration and indicating the additional quantity needed. No additional grading is being requested under this modification. It is understood that this request is for stockpiling purposes only. Over-excavation, compaction, removals, or any other grading related activities are specifically not requested with this application. If you have any questions please do not hesitate to call me.

Sincerely,

Psomas

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. CREHAN
No. C48944
Exp. 9-30-04
CIVIL
STATE OF CALIFORNIA
5/18/01

REGISTERED PROFESSIONAL ENGINEER
MICHAEL DAVID READER
NO. GE 2259
EXP. 6/30/02
GEOTECHNICAL
STATE OF CALIFORNIA
5-18-01

Michael J. Crehan, P.E.
Project Manager

Copy: Pat Larkin, Tim Connors – Playa Vista
Paul Pegg, Steve Murow – The Moote Group

11444 West Olympic Blvd.
Suite 750
West Los Angeles, CA 90064-1549

310.954.3700
310.954.3777 Fax
www.psomas.com

ADDRESS 6775 Central Ave.

City of Los Angeles - Department of Building and Safety
GRADING PRE-INSPECTION REPORT

Permit Application:			
Plan Tag No.	A7058		C.D.

TRACT 12672

BLOCK LOT(S) 2 & 23 COUNTY REF. NO.

Purpose: Stockpile Temporary

Property Posted Yes ☐ No ☑
Fees paid GPI Yes ☑ No ☐
Posting Yes ☐ No ☑

INSPECTORS REPORT OF FIELD CONDITIONS

Approved Graded Lot Yes ☐ No ☑ Bearing Value

Fill over 100 Feet Yes ☐ No ☑ Buttress Fill Yes ☐ No ☐

Slope of Surface Ascending . Descending

Cut	°	Height	
Fill	°	Height	
Natural	°	Height	

Natural Soil Classification Per Table 18.1.A
Silty Clay

Expansive Soil Yes ☑ No ☐
Slide Area Yes ☐ No ☑
Sewer Available Yes ☑ No ☐
PSDS Sized Per Code Yes ☑ No ☐
Site Above ☑ Below ☐ Street
Roof Gutters Yes ☐ No ☐
Condition of Street for Drainage Purposes
Recommended Termination of Drainage

Driveway Grade % Existing ☐ Proposed ☐ Maximum Rough Grade Allowed

GRADING APPROVAL TO ISSUE PERMT(S)

☒ OK TO ISSUE. SEE BELOW FOR COMMENTS

☐ DO NOT ISSUE UNTIL BELOW REQUIREMENTS HAVE BEEN SATISFIED

CONDITIONS & REQUIREMENTS PRECEDENT TO ISSUING PERMIT

1. ☒ A grading permit is required for Relocation & add of Stockpile S.U.O.
2. ☐ A retaining wall permit is required.
3. ☐ OSHA permit required for _____.
4. ☐ All footings shall be founded in undisturbed natural soil per Code.
5. ☐ Comply with provisions of Section 91.1804.4 for expansive soil condition.
6. ☐ In the event excavations reveal unfavorable conditions, the services of a soils engineer and/or geologist may be required.
7. ☐ Geological and/or soils reports are required. Submit two copies, with appropriate fees, to the Grading Section for review and approval. Owner notified by postcard on _____. Reports submitted with plans. Yes ☐ No ☐
8. ☐ Incorporate all recommendations of the approved geological and/or soils reports and Department letters dated _____ into the plans. Soils engineer and/or Geologist to sign plans.
9. ☐ Site is subject to mudflow. Comply with provisions of Section 91.7014.3.
10. ☐ Buildings shall be located clear of the toe of all slopes which exceed a gradient of 3 horizontal to 1 vertical as per Section 91.1806.4.2.
11. ☐ Foolings shall be set back from the descending slope surface exceeding 3 horizontal to 1 vertical as per Section 91.1806.4.3.
12. ☐ Swimming pools and spas shall be set back from descending and ascending slopes as per Section 91.1806.4.4.
13. ☐ Department approval is required for construction of _____ on or over slopes steeper than 2 horizontal to 1 vertical.
14. ☐ Provide complete details of engineered temporary shoring or slot cutting procedures on plans. Call for inspection before excavation begins.
15. ☐ All concentrated drainage, including roof water, shall be conducted, via gravity, to the street or an approved location at a 2% minimum.
16. ☐ A Registered Deputy Inspector is required for _____.
17. ☐ All fill or backfill shall be compacted by mechanical means to a minimum 90% relative compaction as determined by ASTM method D-1557. Subdrains shall be provided where required by Code.
18. ☐ Specify on plans: "The soils engineer is to approve the key or bottom and leave a certificate on the site for the grading inspector. The grading inspector is to be notified before any grading begins and, for bottom inspection, before fill is placed. Fill may not be placed without approval of the grading inspector."
19. ☐ Existing non-conforming slopes shall be cut back at 2:1 (26°) or retained.
20. ☐ All cut or fill slopes shall be no steeper than 2:1 (26°).
21. ☐ Grading General Requirements (B-164) shall be attached to and made a part of the plans.
22. ☐ Stake and flag the property lines in accordance with a licensed survey map.
23. ☐ Approval required by the Department of _____ for _____.

ADDITIONAL REQUIREMENTS:
See Modification — attached to GPI # 8247
9-25-00

See reverse for additional requirements and/or comments

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing or typing.

DISTRIBUTION 8247

☒ Owner ☐ Pl Ck.
☒ Petitioner ☒ W.LA Insp.
☐ Fire ☐ Bur.
☐ Health ☐

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 BLK

TRACT 12672

Owner Playa Capital Company LLC
Address 12555 W. Jefferson Blvd. Suite 300
Los Angeles CA Zip 90066
Daytime Phone (310) 822 0074

District Office W.LA Type
Plan Ck No. Stories
Zone Occ.
Permit No. 98LA78695 No. Units
Job Order No. F.D.
Bureau/Division Building & Safety D.M. 105 B165
Use of Bldg. Stock Pile C.D. 6
Job Status Berms

1

Petitioner P. Somas
Address 11444 W. Olympic Blvd #750
W. Los Angeles CA Zip 90064
Daytime Phone (310) 954 3745

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stock pile (100,000 CY) and existing screening w/ erosion control berm (60,000 CY) (See attached plot plan for location & copy of original Modification 6643 and Modification 7455)

Dept. Comment Extension of Time

Code Sections: L.A.M.C. 91.7011.3

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24

Grading work for all area of project is not finished. Existing berm is crossing several different phases of the project.

Petitioner's Signature Moe Lahooti for P. Somas Position Consultant Date 9/06/2011

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) ( ) Dept. is required.
☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide .....
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By Date 9-25-00

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year.

LA Department of Building and Safety
LA 04 10 018228 09/06/00 04:40PM

BOARD APPLIC FEE $100.

Total Due: $100.
No Fee: $100.
(Cashier Use Only)

NO FEE NO FEE NO FEE

Name: PLAYA VISTA
Addr: 6775 CENTINELA AV
Auth: FEE WAIVER 100.00
Dept: PLAYA VISTA

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832). — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R1/88)

REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)
REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)
REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in or typing.

DISTRIBUTION 8247
☒ Owner ☐ Pl Ck
☒ Petitioner ☒ W.LA Insp.
☐ Fire ☐ Bur.
☐ Health ☐

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 BLK
TRACT 12672

Owner Playa Capital Company LLC
Address 12555 W. Jefferson Blvd. Suite 300
Los Angeles CA Zip 90066
Daytime Phone (310) 822 0074

1

Petitioner P. Somas
Address 11444 W. Olympic Blvd #750
W. Los Angeles CA Zip 90064
Daytime Phone (310) 954 3745

District Office W.LA
Plan Ck No.
Zone
Permit No. 98LA78695
Job Order No.
Bureau/Division Building & Safety
Use of Bldg. Stock Pile
Job Status Berms
Type
Stories
Occ.
No. Units
F.D.
D.M. 105 B165
C.D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stock pile (100,000 CY) and existing screening w/ erosion control berm (60,000 CY) (See attached plot plan for location & copy of original Modification 6643 and Modification 7455)

Dept. Comment Extension of Time

Code Sections: L.A.M.C. 91.7011.3

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24

Grading work for all area of project is not finished. Existing berm is crossing several different phases of the project.

Petitioner's Signature Moe Lahooti for P. Somas Position Consultant Date 9/06/2000

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) ( ) Dept. is required.
☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 9-25-00

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year.

LA Department of Building and Safety
LA 04 10 018228 09/06/00 04:40PM

BOARD APPLIC FEE $100.
Total Due: $100.
No Fee: $100.
(Cashier Use Only)

NO FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 6775 CENTINELA AV
Auth: FEE WAIVER 100.00
Dept: PLAYA VISTA

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832). — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R1/88)

6775 W Centinela Ave JON

Permit #: 98030 - 10000 - 01912
Plan Check #: Reference #:
Event Code:

ading

City of Los Angeles - Department of Building and Safety
APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Status: Ready to Issue
Status Date: 09/04/98
Printed on: 09/04/98 16:03:10

Over the Counter Permit

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
RANCHO SAUSAL RED		LT 38 T2S R14W	441	PAT 1-507/508	105B165 538	4211 - 011 - 023

3. PARCEL INFORMATION

No-Zone Permit -
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Census Tract - 2770.000
District Map - 105B165
Energy Zone - 6
Thomas Brothers Map Grid - 672

ZONE(S):

4. DOCUMENTS

5. CHECKLIST ITEMS

CEQA - CEQA Exempted09/04/98

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co Llc 12555 Jefferson Blvd STE 300 LOS ANGELES CA 90066

Tenant:

Applicant: (Relationship: Agent for Owner)
- Psomas & Assoc 3420 Ocean Park Blvd #1040 SANTA MONICA, CA 90405 (310) 450-1217

7. EXISTING USE

PROPOSED USE
60 Grading - Non-Hillside

8. DESCRIPTION OF WORK
1,100,000 cu yds removal from stockpile of 1,259,000 cu yds -Remaining Volume 160,000 cu yds [100,000 cu yds "stockpile" + "berm" 60,000 cu yds]

9. # Bldgs on Site & Use: VACANT

For information and/or inspection requests originating within LA County, call toll-free (888)-LA4BUILD; outside LA County, call (213)-977-6941.

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
DAS PC By:
OK for Cashier: Armando Flores
Coord. OK:
Signature:
Date:

For Cashier's Use Only W/O #: 83001912

09/04/98 04:17:16PM LA01 1-0566 C 29
GRADING PLAN C 20.00
INVOICE # 1000[illegible] PP
[illegible] 160.00
CYS ADD 10.80
[illegible] 3.60
MISCELLANEOUS 5.00
CITY PLAN SURC 5.40
TOTAL 204.80
CASH 220.00
CHANGE 15.20

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 50 cu yd
PC Valuation: 0 cu yd

FINAL TOTAL Grading	204.80
Permit Fee Subtotal Grading	160.00
Plan Check Subtotal Grading	0.00
O.S. Surcharge	3.60
Sys. Surcharge	10.80
Planning Surcharge	5.40
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	20.00

PCLA 78695

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

Misc. (See Comments)
Plot Plan

DEPARTMENT OF BUILDING AND SAFETY

INSPECTION RECORD

CITY OF LOS ANGELES

Do Not Call for Framing Inspection Until Electrical, Plumbing & Heating Approvals have been Obtained.

Inspections	Date	Inspector
Rough Electrical		
Rough Plumbing		
Rough Heating & Refrig.		
Rough Disabled Access		
Rough Framing		
Rough Fire Sprinklers		
Insulation		
OK to Cover		
DO NOT COVER UNTIL ABOVE IS SIGNED		
Exterior Lathing		
Interior Lathing		
OK to Plaster		
DO NOT PLASTER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE BUILDING		
Sewer		
Gas		
Heating & Refrigeration		
Electrical Underground		
FINAL INSPECTIONS		
Final Electrical		
Final Gas		
Final Plumbing		
Final Heating & Refrigeration		
Final Fire Sprinklers		
Final L.A.F.D. OK Title 19 Jobs Only		
Final Disabled Access		
Final Grading		
Final		

ADDRESS OF JOB

NATURE OF WORK

BLDG. PERMIT NO. 98LA 78695
09/04/98 04:19:0
LA03 T-0584 C 29

OWNER

Inspections	Date	Inspector
GRADING INSPECTIONS		
Initial Grading		
Toe or Bottom		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Excavation		
Fill		
Drainage Devices		
Rough Grading		
BUILDING AND MECHANICAL INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
DO NOT PLACE CONCRETE UNTIL ABOVE IS SIGNED		
Heating & Refrig. Groundwork		
Electrical Groundwork		
Plumbing Groundwork		
Gas Piping Groundwork		
OK to Place Slab Floor		
DO NOT PLACE CONCRETE SLAB FLOOR UNTIL ABOVE IS SIGNED		

City of Los Angeles — Department of Building and Safety

6 REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 9135
Mgr	DISTRIBUTION
	☑ Owner ☐ ..... Pl Ck.
	☑ Petitioner ☑ ..... Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Avenue | LOT(S) 2 and 3 | TRACT 12672 | BLK

1

Owner ..Playa Capital Company, LLC.....
Address ..12555 W. Jefferson Blvd #300.
..Los Angeles.. CA.. Zip..90066.....
Daytime Phone (310) 8220074.....

Petitioner .Psomas.....
Address ...1444 W. Olympic Blvd #750....
..W. Los Angeles.., CA.. Zip...90064.....
Daytime Phone (310) 954-3700 ...x MDE...

District Office ..W.L.A.... Type .....
Plan Ck No..... Stories .....
Zone ..... Occ.....
Permit No. 98LA78695 No. Units .....
Job Order No..... F.D. .....
Bureau/Division Building.. D.M. 105.B1.65.
Use of Bldg.....Bldg.... C.D. ....6.....
Job Status .....

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary Stockpile & Berm for Screen / Erosion Control, (100,000 + 60,000 = 160000 CY Re-Grading Permit 98LA78695 and Modification# 8247).

Dept. Comment Extension of Time | Code Sections: L.A.M.C.– 91.7011.3 | Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Since Grading work for all area of Project is not finished, existing stockpile & berm (Screen / erosion control berm) will be required to remain in place.

Petitioner's Signature ..M. Lamb.. Position .For Psomas. Date 9/24/2001 | Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ~~☐ Denied (See reverse for appeal information)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Steve Cabrera
Department Action By

9/26/01
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year (Sept 10, 2002)

Department of Building and Safety
002 28 041097 09/26/01 04:06PM
BOARD APPLIC FEE $100.00
Total Due: $100.00
(Cashier Use Only)
NO FEE NO FEE
No. of Items
Fee due
Fee verified

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 8247

DISTRIBUTION

☒	Owner	☐	..... Pl Ck.
☒	Petitioner	☒	W. L.A. ..... Insp.
☐	Fire	☐	..... Bur.
☐	Health	☐	.....

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 BLK

TRACT 12672

1 Owner Playa Capital Company, LLC

Address 12555 W. Jefferson Blvd., Suite 300

Los Angeles, CA Zip 90066

Daytime Phone (310) 822-0074

Petitioner P. Somas

Address 11444 W. Olympic Blvd #750

W. Los Angeles, CA Zip 90064

Daytime Phone (310) 954-3745

District Office W. L.A. Type .....

Plan Ck No. ..... Stories .....

Zone ..... Occ. .....

Permit No. 98LA78695 No. Units .....

Job Order No. ..... F. D. .....

Bureau/Division Building & Safety D. M. 105 B165

Use of Bldg. Stock Pile C. D. 6

Job Status "Berms"

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER

☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER

☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stock pile (100,000 CY) and existing screening / Erosion Control berm (600,000 CY). (See attached Plot Plan for Location & Copy of Original Modification 6643 and Modification 7455).

Dept. Comment Extension of Time

Code Sections: L.A.M.C. – 91.7011.3

Title 24 –

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading work for all areas of Project is not finished. Existing berm is Crossing several different Phases of the Project.

Petitioner's Signature [signature] Position Consultant Date 9/06/2000

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide .....

(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By [signature] Date 9-25-00

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. No grading work is included in this approval.
2. Extension of time for one year.

LA Department of Building and Safety
LA 04 10 018228 09/06/00 04:40PM

BOARD APPLIC FEE	$100.00
Total Due:	$100.00
No Fee:	$100.00

(Cashier Use Only)

NO FEE NO FEE NO FEE

Name: PLAYA VISTA

Addr: 6775 CENTINELA AV

Auth: FEE WAIVER

Dept: PLANNING

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Rec. No. 832

received 10-2-00

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

6775 W.Centinela Ave

Permit Application #: 98030 - 10000 - 01912

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

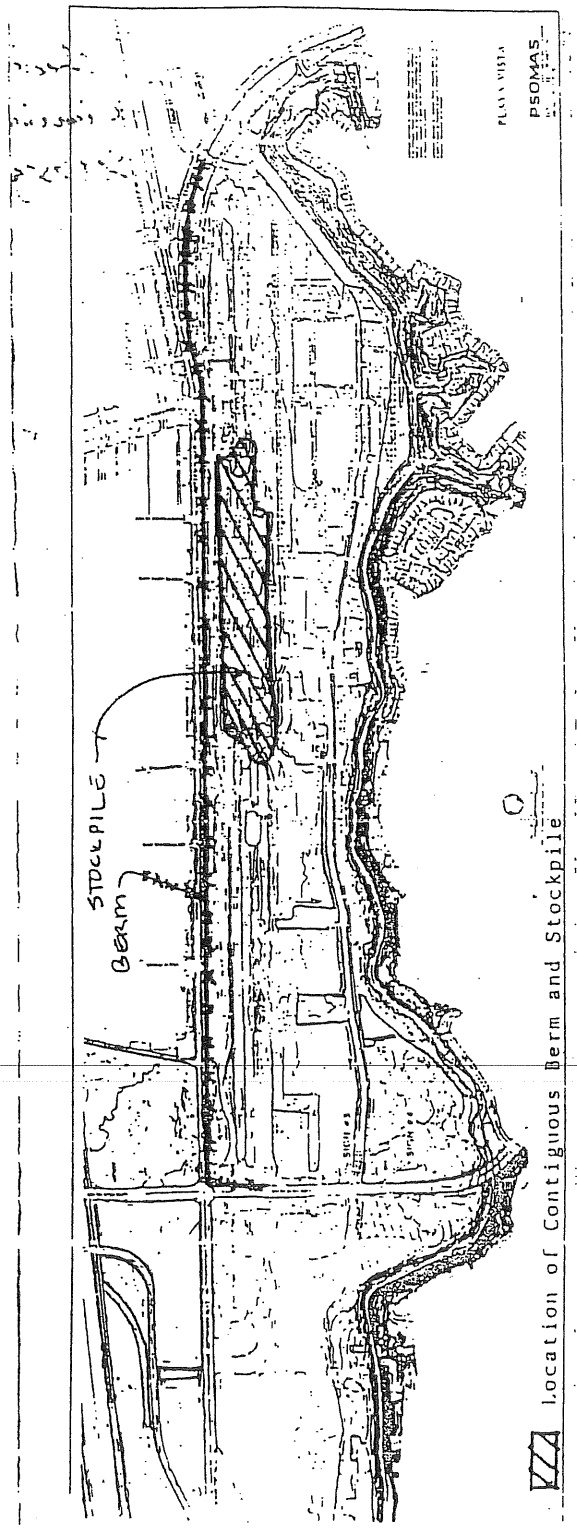
Initiating Office: METRO

Over the Counter Permit

PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:05

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



COUNCIL DISTRICT: 6

PLOT PLAN ATTACHMEN

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY	FILE NO. 6043
	DISTRIBUTION
	☒ Owner ☐ ..... Pl Ck.
	☑ Petitioner ☒ WL Insp.
	☐ Fire ☐ ..... Bur.
	☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 BLK

TRACT 12672

1

Owner .... PLAYA CAPITAL COMPANY, LLC,
Address ... 12555 W. Jefferson Blvd., Suite 300
... Los Angeles, CA ... Zip 90066
Daytime Phone (310) 822-0074

Petitioner PSOMAS AND ASSOCIATES
Address ... 3420 Ocean Park Blvd., Suite 1040
Santa Monica, CA ... Zip 90405
Daytime Phone (310) 450-1217

District Office W. L. A. ... Type ...
Plan Ck No. ... Stories ...
Zone M ... Occ. ...
Permit No. 98LA78695 ... No. Units ...
Job Order No. ... F. D. II ...
Bureau/Division EBG/PC ... D. M. 105B165 ...
Use of Bldg. Stockpile ... C. D. 6 ...
Job Status ...

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stockpile of 1.259 million cy of dirt authorized by previous modifications, most recently 3852, which expires on 9/5/98. Petitioner requests that a time extension is issued to allow 100,000 cy of the stockpile to remain for one additional year, and 60,000 cy of stockpile to remain in visual screening and erosion control berm for a period of one year (see attached exhibit for location).

ept. Comment Extend time for stockpile

Code Sections: L.A.M.C. – 91.7011.3

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24 –

Owner has removed 1.1 million cy of stockpile authorized by Mod. 3852 and Grading Permit 98LA78695. The dirt has been moved along approved construct. roads to Tract 49104-01, where it is being used as fill for grading under permits 95VN86145 and Mod. 4061 (time extension), 98LA76021 and BC#401367. Owner requests a time extension to allow the remaining dirt to stay in the screening/erosion control berm (60,000 cy) and stockpile (100,000 cy).

Petitioner's Signature Jonathan Psomas Position PSOMAS Date 9/2/98

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Representative ... Date 9-18-98

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

09/03/98 12:15:15PM LA05 T-6414C
BOARD APPLIC F 100.0
TOTAL 100.00
CHECK 100.00

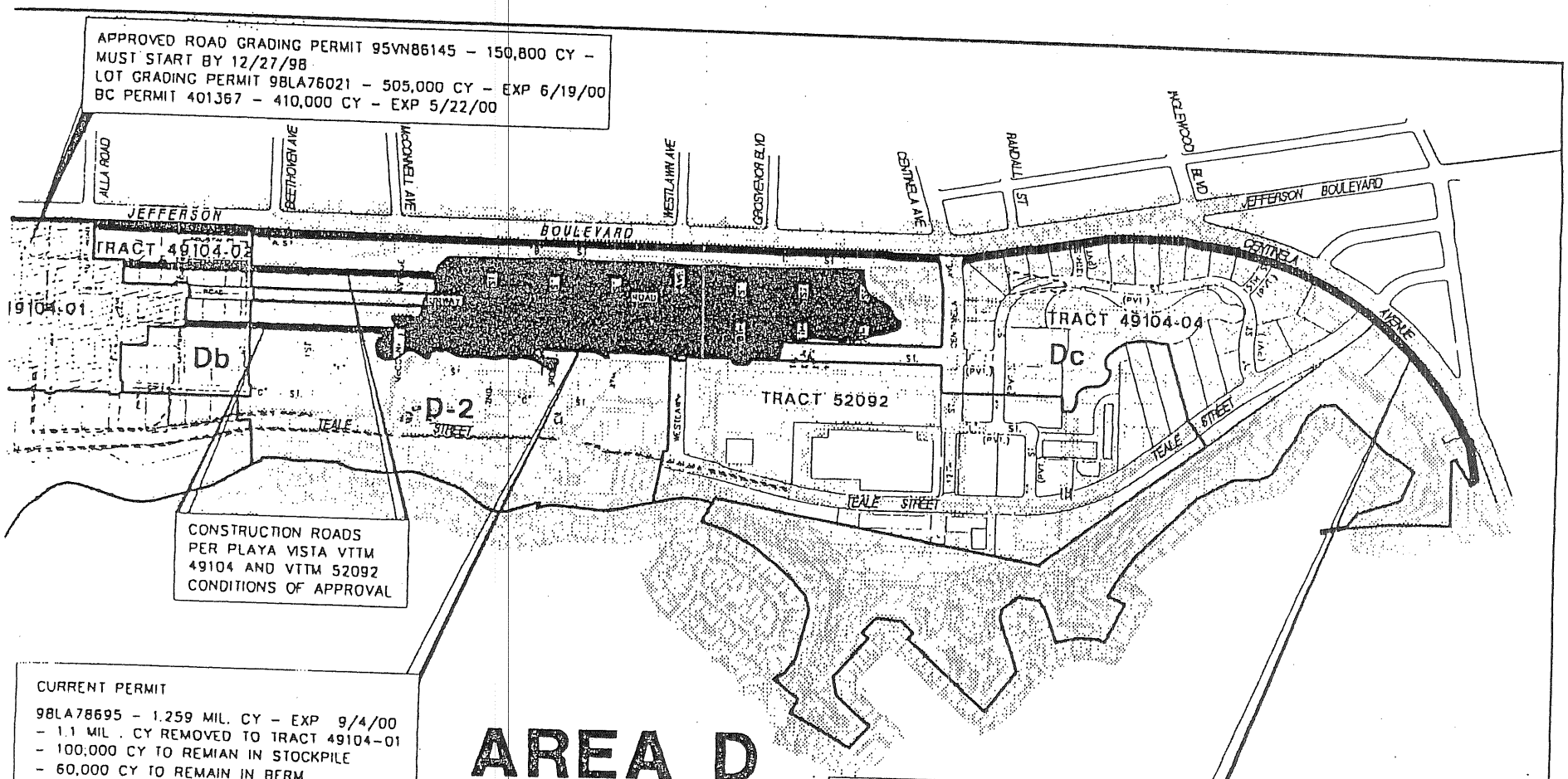
(Cashier Use Only)

No. of Items 1
Fee due $100.00
Fee verified L.K.

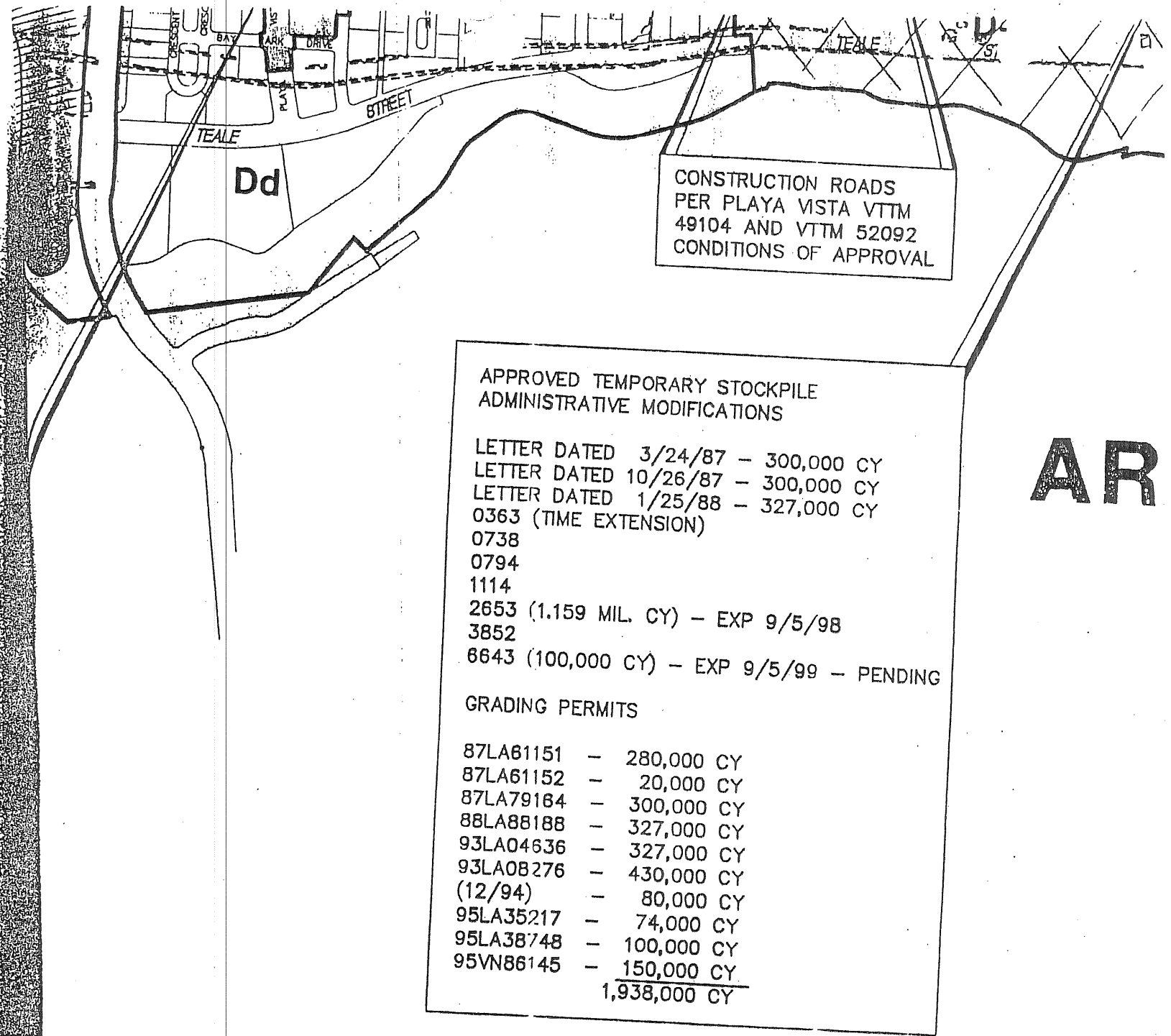
APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832


APPROVED ROAD GRADING PERMIT 95VN86145 – 150,800 CY – MUST START BY 12/27/98
LOT GRADING PERMIT 98LA76021 – 505,000 CY – EXP 6/19/00
BC PERMIT 401367 – 410,000 CY – EXP 5/22/00
ALLA ROAD
BEETHOVEN AVE
MCCONNELL AVE
WESTLAWN AVE
GROSVENOR BLVD
CENTINELA AVE
RANDALL ST
INGLEWOOD BLVD
JEFFERSON BOULEVARD
TRACT 49104-02
TRACT 49104-01
TRACT 49104-04
TRACT 52092
Db
D-2
Dc
TEALE STREET
CONSTRUCTION ROADS PER PLAYA VISTA VTTM 49104 AND VTTM 52092 CONDITIONS OF APPROVAL
AREA D
CURRENT PERMIT
98LA78695 – 1.259 MIL. CY – EXP 9/4/00
– 1.1 MIL. CY REMOVED TO TRACT 49104-01
– 100,000 CY TO REMIAN IN STOCKPILE
– 60,000 CY TO REMAIN IN BERM
APPROVED TEMPORARY STOCKPILE ADMINISTRATIVE MODIFICATIONS
LETTER DATED 3/24/87 – 300,000 CY
LETTER DATED 10/26/87 – 300,000 CY
LETTER DATED 1/25/88 – 327,000 CY
0363 – TIME EXTENSION
0738 – TIME EXTENSION
0794 – 430,000 CY
1114 – 74,500 CY
2653 – TIME EXTENSION – EXP 6/3/97
3852 – 1.1 MIL. CY – EXP 9/5/98
6643 – 100,000 CY – EXP 9/5/99 (PENDING)
TEMPORARY BERM STOCKPILE FOR VISUAL SCREENING AND EROSION CONTROL ADMINISTRATIVE MODIFICATION
6643 – 60,000 CY – EXP 9/5/99 (PENDING)
GRADING PERMIT
98LA78695 – 60,000 CY OF 1.259 MIL. CY TO REMAIN IN BERM – EXP 9/4/00

98030 10000 0192



CONSTRUCTION ROADS
PER PLAYA VISTA VTTM
49104 AND VTTM 52092
CONDITIONS OF APPROVAL

APPROVED TEMPORARY STOCKPILE
ADMINISTRATIVE MODIFICATIONS

LETTER DATED 3/24/87 – 300,000 CY
LETTER DATED 10/26/87 – 300,000 CY
LETTER DATED 1/25/88 – 327,000 CY
0363 (TIME EXTENSION)
0738
0794
1114
2653 (1.159 MIL. CY) – EXP 9/5/98
3852
6643 (100,000 CY) – EXP 9/5/99 – PENDING

GRADING PERMITS

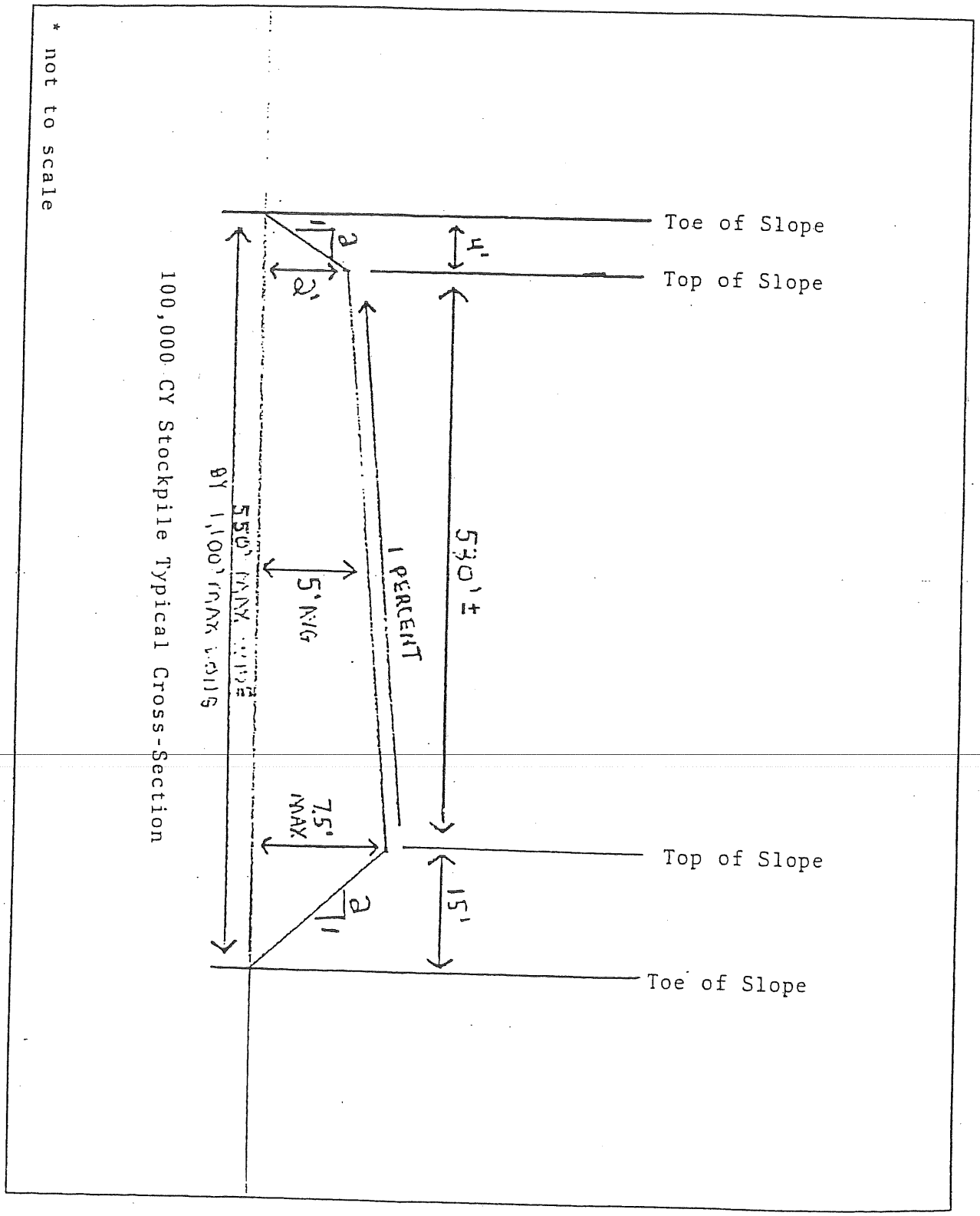
87LA61151	–	280,000 CY
87LA61152	–	20,000 CY
87LA79164	–	300,000 CY
88LA88188	–	327,000 CY
93LA04636	–	327,000 CY
93LA08276	–	430,000 CY
(12/94)	–	80,000 CY
95LA35217	–	74,000 CY
95LA38748	–	100,000 CY
95VN86145	–	150,000 CY
		1,938,000 CY

AR

PSOMAS

☐ Santa Monica 310/450-1217
☐ Costa Mesa 714/751-7373
☐ Riverside 909/787-8421
☐ Sacramento 916/929-7100

Job No. _____ Sheet _____ of _____
Project Name _____
Prepared By _____ Date _____
Reviewed By _____ Date _____
Revised By _____ Date _____



PSOMAS

Job No. 1PCC0201-35 Sheet 1 of 1

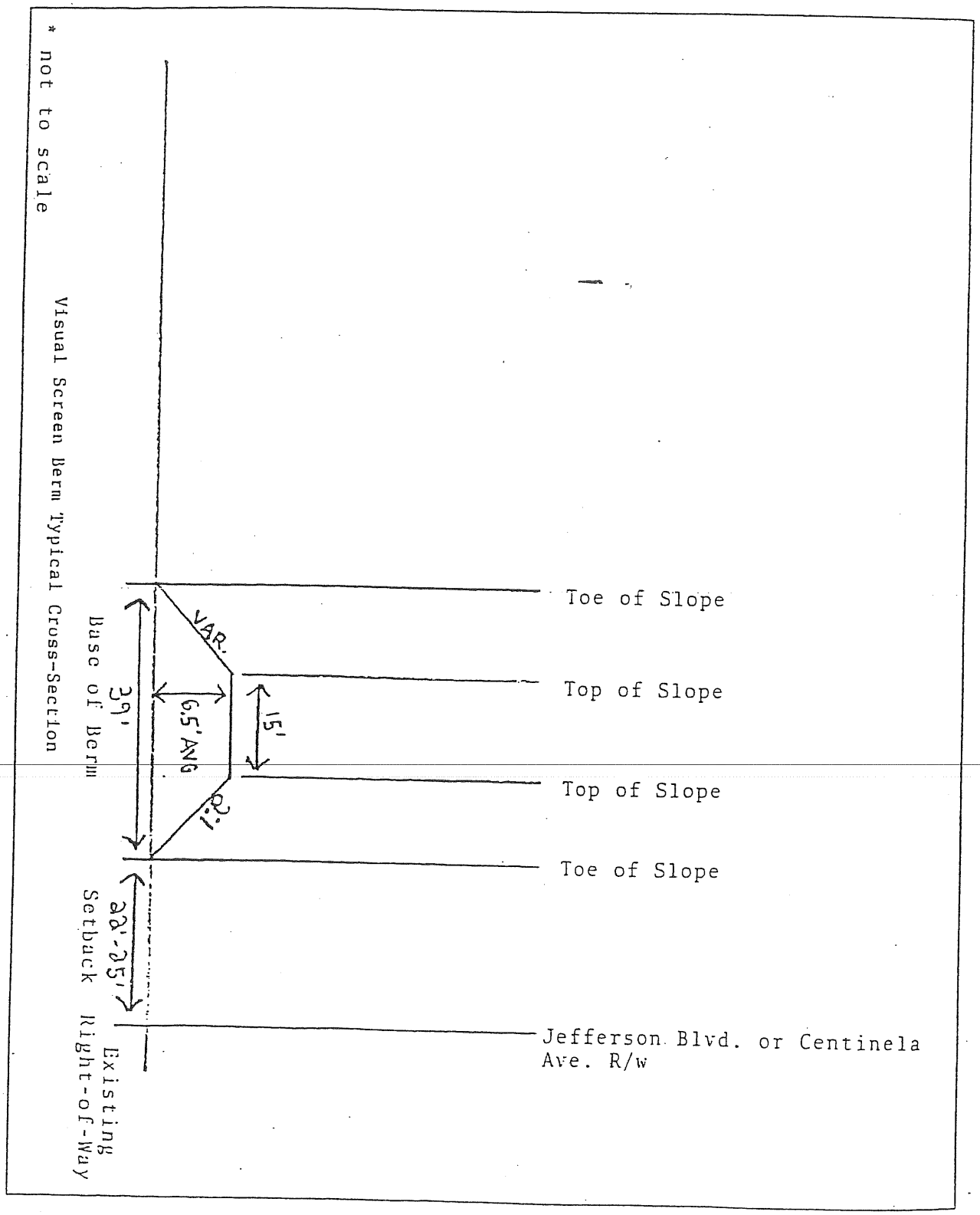
☒ Santa Monica 310/450-1217
☐ Costa Mesa 714/751-7373
☐ Riverside 909/787-8421
☐ Sacramento 916/929-7100

Project Name PLAYA VISTA

Prepared By _____ Date _____

Reviewed By _____ Date _____

Revised By _____ Date _____



City of Los Angeles — Department of Building and Safety

READ BY | FILE NO. 7455

DISTRIBUTION

☒ Owner	☐	.....	Pl Ck.
☒ Petitioner	☒	W.L.A.	Insp.
☐ Fire	☐	.....	Bur.
☐ Health	☐	.....	

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

JOB ADDRESS 6775 Centinela Avenue

LOT(S) 2 and 3 | BLK

TRACT 12672

Owner Playa Capital Company, L.L.C.

Address 12555 W. Jefferson Blvd., Suite 300

Los Angeles, CA Zip 90066

1 Daytime Phone (310) 822-0074

Petitioner Psomas and Associates

Address 11444 W. Olympic Boulevard #750

W. Los Angeles, CA Zip 900

Daytime Phone (310) 954-3745

District Office W.L.A. | Type

Plan Ck No. | Stories

Zone | Occ.

Permit No. 98LA78695 | No. Units

Job Order No. | F. D.

Bureau/Division E.B.C./P.C. | D. M. 105 B165

Use of Bldg. Stockpile | C. D. 6

Job Status

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER

☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER

☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension of time to allow temporary stockpile (100,000 CY) and Existing Screening/erosion Control berm (60,000 CY). See Attached Plot Plan for Location) + Modification to 6643

Dept. Comment Extension of time for stockpile and berm.

Code Sections: L.A.M.C. – 7011.3

Title 24 –

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading work is in progress. Berm is crossing several different phases of the project.

Petitioner's Signature Moe Lahsaie For: Psomas and Associates Position Consultant Date 9.15.99

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Dana Pidwat
Department Action By

9/23/99
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. This extension will expire in one year from the date of approval.

(Cashier Use Only)

No. of Items cash 1

Fee due $ 100.00

Fee verified DL

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1/88)

Grading

City of Los Angeles - Department of Building and Safety

Plan Check #:

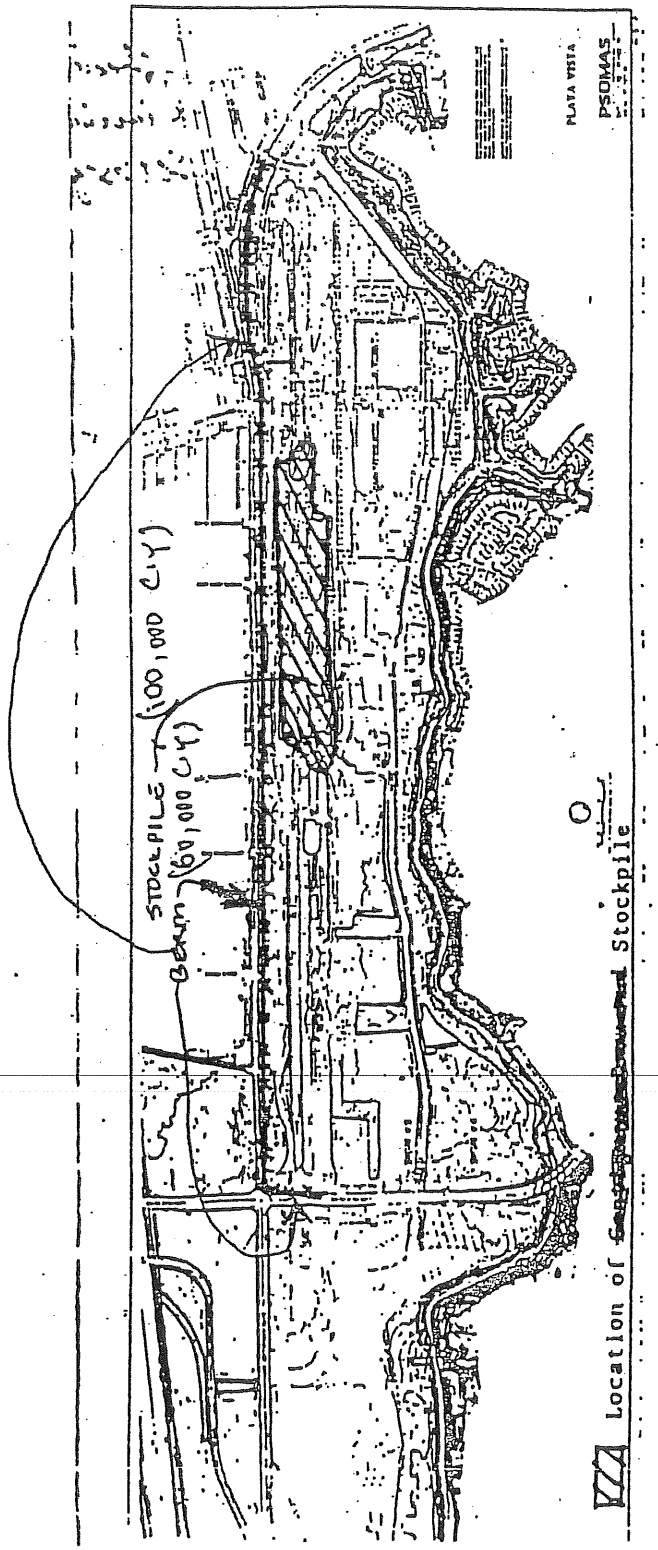
Initiating Office: METRO

Over the Counter Permit

PLOT PLAN ATTACHMENT

Printed on: 09/04/98 16:06:05

(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)



City of Los Angeles — Department of Building and Safety

REQUEST FOR MODIFICATION (BUILDING ORDINANCES (98.0403 L.A.M.C.)

REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

QUEST FOR HARDSHIP EXEMPTION OR UIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 6486

DISTRIBUTION

- ☒ Owner ☐ ..... Pl Ck.
- ☒ Petitioner ☒ WL Insp.
- ☐ Fire ☐ ..... Bur.
- ☐ Health ☐ .....

JOB ADDRESS 6775 CENTINELA AVE. LOT(S) 2+3 BLK TRACT 12672

Owner PLAYA CAPITAL COMPANY, LLC
Address 12555 JEFFERSON BLVD.
LOS ANGELES, CA Zip 90066
Daytime Phone (310) 822-0074

1

Petitioner PSOMAS + ASSOCIATES
Address 3420 OCEAN PARK BLVD, # 1040
SANTA MONICA, CA Zip 90405
Daytime Phone (310) 450-1217

District Office W LA
Plan Ck No. CC
Zone M
Permit No.
Job Order No.
Bureau/Division ~~EAK~~ / PC
Use of Bldg.
Job Status IN PROGRESS

Type
Stories
Occ.
No. Units
F. D. H
D. M.
C. D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

ALLOW TEMPORARY STOCKPILE (ADDITIONAL 300,000 C.Y. OF DIRT TO THE EXISTING STOCKPILE PERMIT # 93LA35217 AND ADMINISTRATIVE MODIFICATION DATED 5/31/96 FILE # 2653)

SEE ATTACHED SKETCH

Dept. Comment Temporary Stockpile for 1 year

Code Sections: L.A.M.C. – 91.7011.3

JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24 –

GRADING FOR PHASE I (TR. 49104-01) IS UNDERWAY AND PLANS ARE BEING PREPARED FOR EMTD AREA (ADJACENT TO THIS PROPOSED STOCKPILE) WHICH WILL REQUIRE THIS DIRT.

Petitioner's Signature Paul T. Maynard Position PROJECT MANAGER Date 7-11-98

Reviewed By L. KIBEL Date 7-14-98

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) ~~(IS NOT)~~ in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Approval — Date 7-24-98

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. A grading permit shall be obtained. The existing waterlines shall be relocated prior to the stockpile.
2. The approval is valid for 1 year only. (ti) 7-25-98

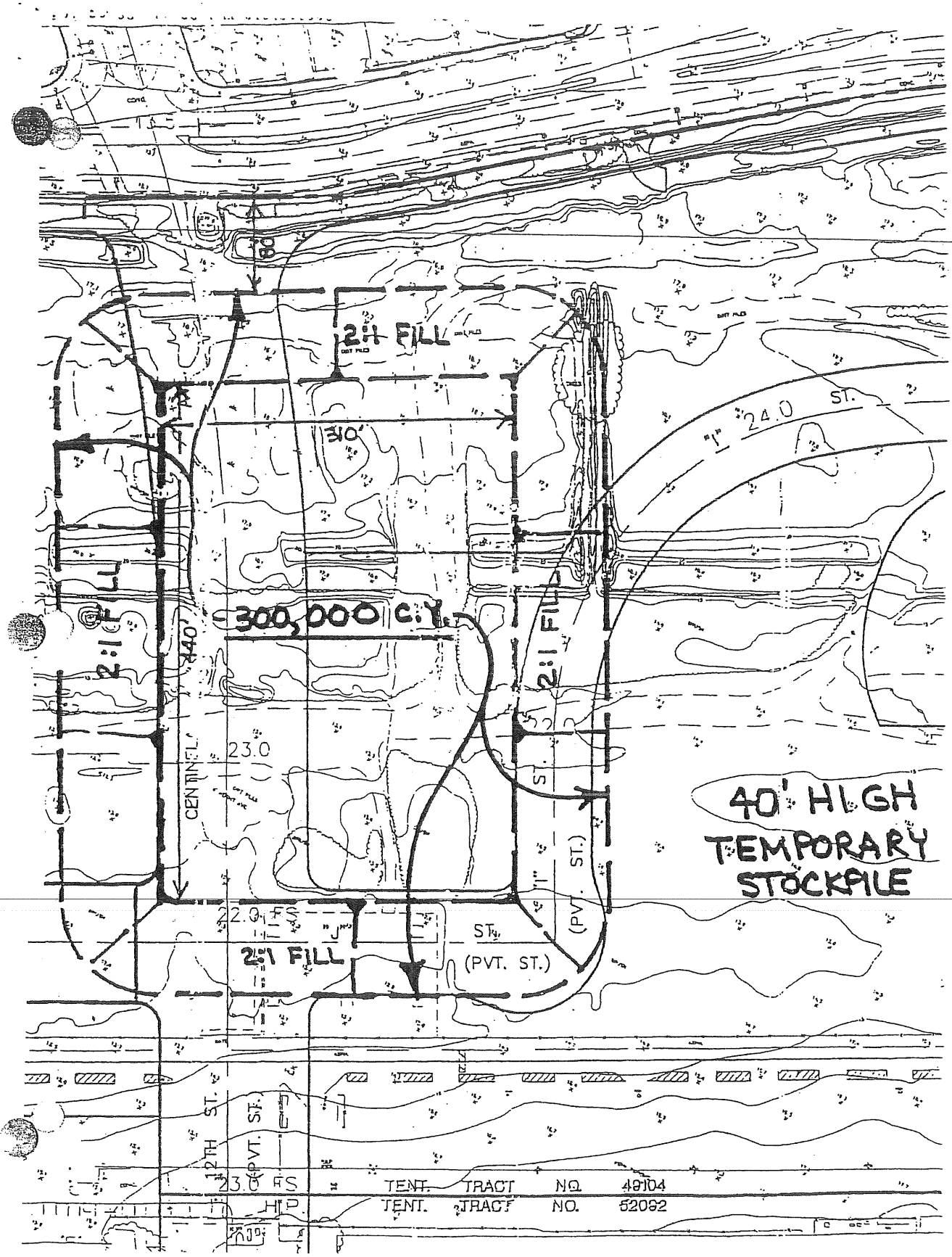
(Cashier Use Only)

No. of Items 1 + FIELD INSP
Fee due 165.00
Fee verified L.R.K.

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832



2:1 FILL
310'
24.0 ST.
"I"
300,000 C.Y.
2:1 FILL
440'
2:1 FILL
23.0
CENTINEL
ST.
(PVT. ST.)
40' HIGH
TEMPORARY
STOCKPILE
22.0 FS
"J"
ST.
2:1 FILL
(PVT. ST.)
12TH ST.
(PVT. ST.)
23.0 FS
TENT. TRACT NO. 49104
TENT. TRACT NO. 52092

irading

)ver the Counter Permit

City of L ngeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Status: Ready to Issue
Status Date: 07/29/98
Printed on: 07/29/98 15:11:25

	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
A[illegible]O SAUSAL RED		LT 38 T2S R14W	441	PAT 1-507/508	105B165 538	4211 - 011 - 023

PARCEL INFORMATION

No-Zone Permit -
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120

Census Tract - 2770.000
District Map - 105B165
Energy Zone - 6
Thomas Brothers Map Grid - 672

ONE(S):

4. DOCUMENTS

5. CHECKLIST ITEMS

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co Llc 1999 Ave Of The Stars 26 FLR LOS ANGELES CA 90067

Tenant:

Applicant (Relationship: Engineer)
- Psomas & Assoc 3420 Ocean Park Blvd #1040 SANTA MONICA, CA 90405 (310) 450-1217

EXISTING USE

PROPOSED USE
60 Grading - Non-Hillside

8. DESCRIPTION OF WORK
stockpile 300,000 cu yds additional to 93LA35217 Modification LOG#6486 dtd 7/24/98 (1 Year)

9. # Bldgs on Site & Use: VACANT

For information and/or inspection requests originating within LA County, call toll-free (888)-LA4BUILD; outside LA County, call (213)-977-6941.

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
OK for Cashier: Armando Flores
Signature:

DAS PC By:
Coord. OK: _____
Date:

For Cashier's Use Only W/O #: 83001614

[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
[illegible]
MISCELLANEOUS 5.00
CITY PLAN SURC 371.07
TOTAL 13,734.59
CHECK 13,734.59

92LA 77388

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 300,000 cu yd PC Valuation: 51 cu yd

FINAL TOTAL Grading	13,734.59
Permit Fee Subtotal Grading	12,225.00
Plan Check Subtotal Grading	144.00
O.S. Surcharge	247.38
Sys. Surcharge	742.14
Planning Surcharge	371.07
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

er Cap ID: Total Bond(s) Due:

17 CHMENTS
Pl an

CITY OF LOS ANGELES

Do Not Call for Building Inspection Until Electrical, Plumbing & Heating Approvals have been Obtained.

Inspections	Date	Inspector
Rough Electrical		
Rough Plumbing		
Rough Heating & Refrig.		
Rough Disabled Access		
Rough Framing		
Rough Fire Sprinklers		
Insulation		
OK to Cover		
DO NOT COVER UNTIL ABOVE IS SIGNED		
Exterior Lathing		
Interior Lathing		
OK to Plaster		
DO NOT PLASTER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE BUILDING		
Sewer		
Gas		
Heating & Refrigeration		
Electrical Underground		
FINAL INSPECTIONS		
Final Electrical		
Final Gas		
Final Plumbing		
Final Heating & Refrigeration		
Final Fire Sprinklers		
Final L.A.F.D. OK Title 19 Jobs Only		
Final Disabled Access		
Final Grading		
Final		

ADDRESS OF JOB

NATURE OF WORK

BLDG. PERMIT NO. 98LA 77388
07/29/98 03:14:55
LA05 T-3530 C 10

OWNER

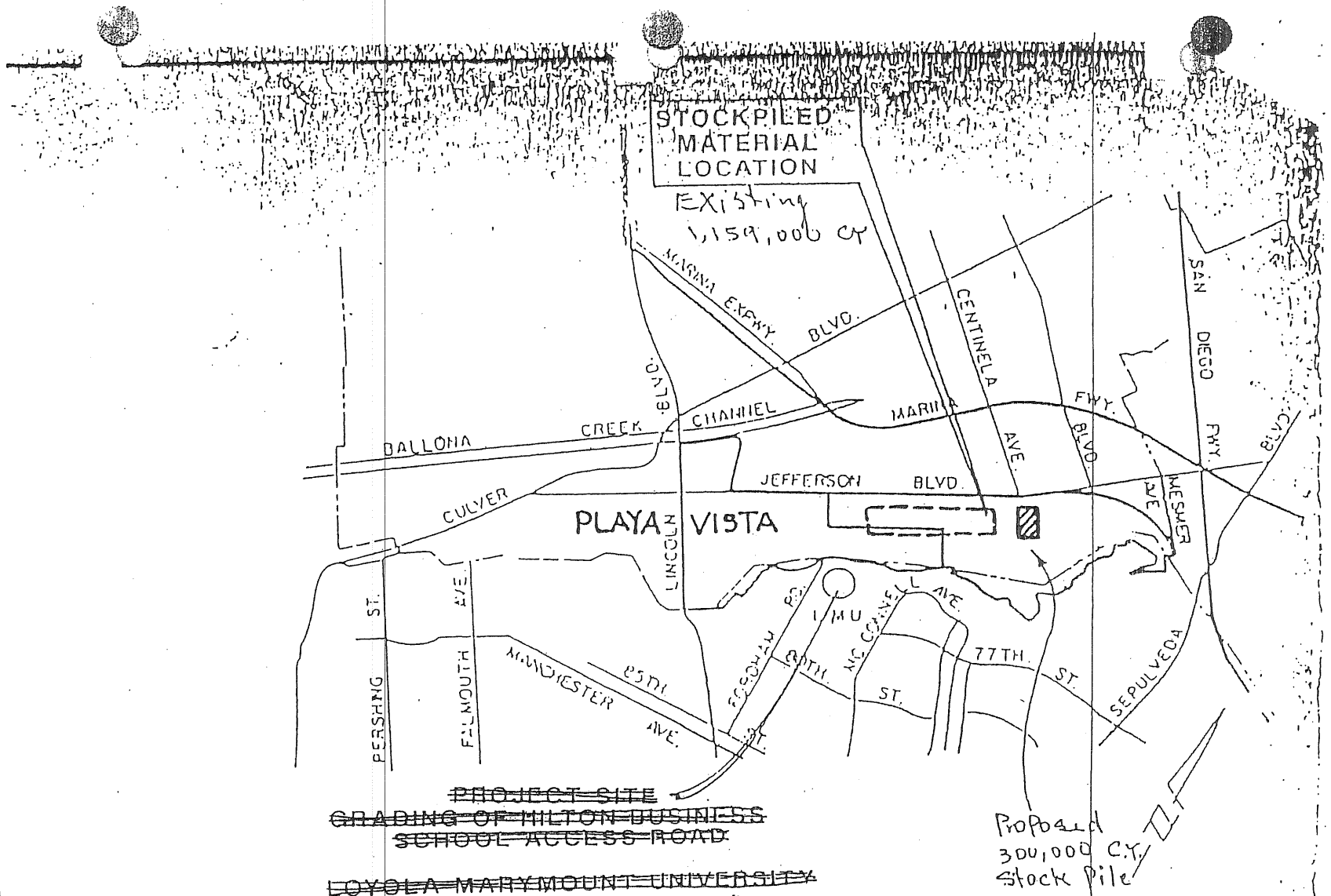
Inspections	Date	Inspector
GRADING INSPECTIONS		
Initial Grading		
Toe or Bottom		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Excavation		
Fill		
Drainage Devices		
Rough Grading		
BUILDING AND MECHANICAL INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
DO NOT PLACE CONCRETE UNTIL ABOVE IS SIGNED		
Heating & Refrig. Groundwork		
Electrical Groundwork		
Plumbing Groundwork		
Gas Piping Groundwork		
OK to Place Slab Floor		
DO NOT PLACE CONCRETE SLAB FLOOR UNTIL ABOVE IS SIGNED		

==========

DEPARTMENT OF BUILDING & SAFETY
L.A. MAIN OFFICE
07/29/98 03:14:55PM LA05 T-3530 C 10

GRADING PERMIT	12,225.00
INVOICE # 0000000 PP	
GRADING PLAN C	144.00
ONE STOP	247.38
SYS DEV	742.14
MISCELLANEOUS	5.00
CITY PLAN SURC	371.07
TOTAL	13,734.59
CHECK	13,734.59

98LA 77388

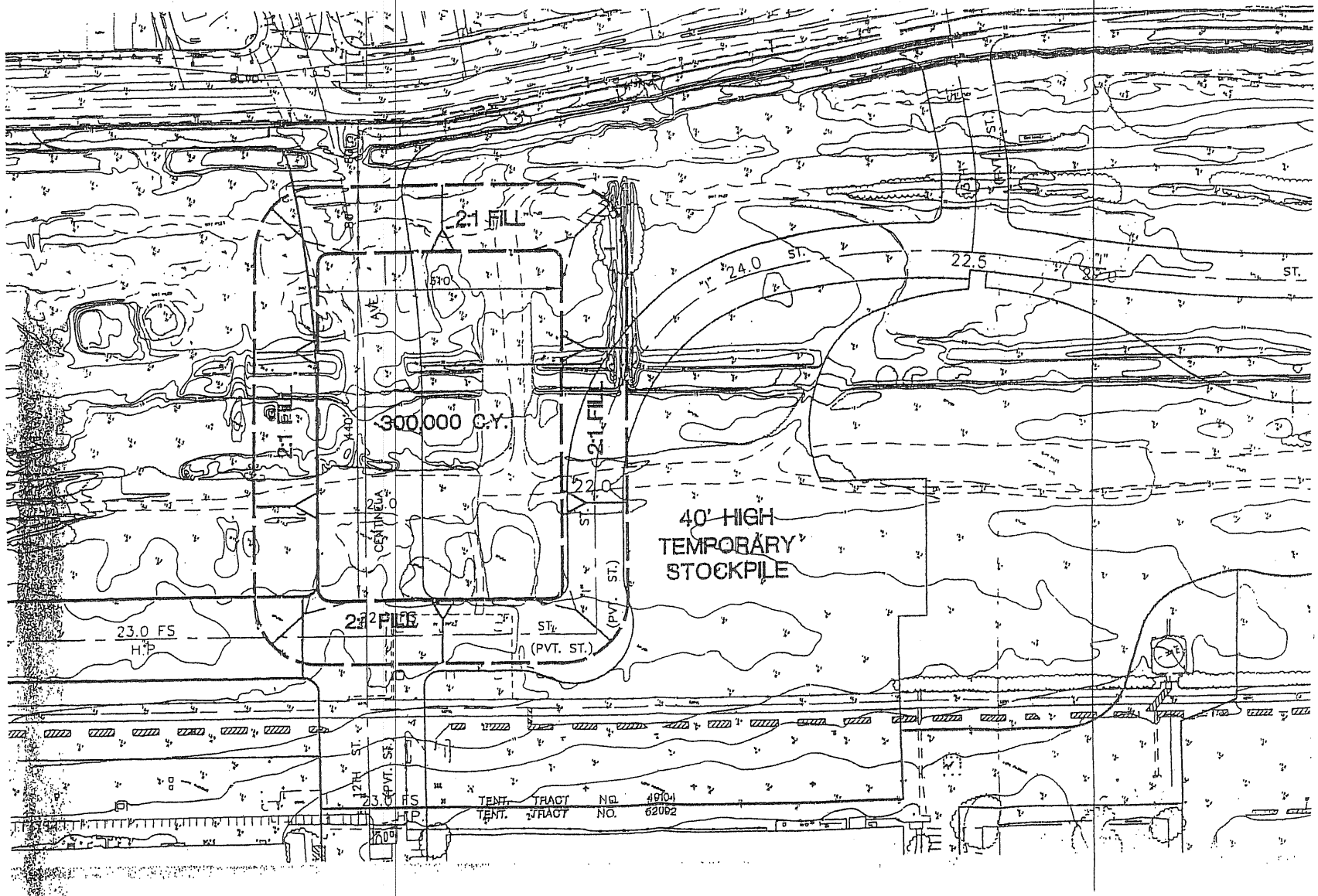


VICINITY MAP

(N.T.S.)

PSOMAS
Psomas and Associates
3420 Ocean Park Boulevard
Santa Monica, California 90405
310/449-1217
Engineers
Surveyors
Planners

7-10-98


2:1 FILL
300,000 C.Y.
2:1 FILL
2:1 FILL
2:1 FILL
40' HIGH
TEMPORARY
STOCKPILE
24.0
22.5
22.0
23.0 FS
H.P.
(PVT. ST.)
12TH ST.
(PVT. ST.)
TENT. TRACT NO. 49104
TENT. TRACT NO. 62092

City of Los Angeles — Department of Building and Safety

☒ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 8118

DISTRIBUTION

☒ Owner	☒ 2 LADBS	Plan Ck.
☒ Petitioner	☒ 3	Insp.
☐ Fire	☐	Bur.
☐ Health	☐	

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2+3 BLK

TRACT 12672

Owner Playa Capital Company, LLC

Address 1255 Jefferson Blvd. #300

Los Angeles CA Zip 90066

Daytime Phone (310) 822-0074

1

Petitioner P. Soumas

Address 11444 W. Olympic Blvd #750

W. Los Angeles CA Zip 90064

Daytime Phone (310) 954-3745

District Office	W. L.A.
Plan Ck No.	
Zone	
Permit No.	
Job Order No.	ENG. Check
Bureau/Division	Grading
Use of Bldg.	
Job Status	
Type	
Stories	
Occ.	
No. Units	
F. D.	
D. M.	
C. D.	

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER

☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER

☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To exten Grading Permit # 98 LA 77388 for temporary stockpile (300,000 CY) under approved modification # 04BC, dated 7.24.98. For Location of stock pile See attached exhibit.

Dept. Comment Extend Temporary Stockpile

Code Sections: L.A.M.C.– 91.7011.3

Title 24–

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Stockpile still required for dirt to fill Tracts 49104-01 and 02 when Court decision is made

Petitioner's Signature P. Soumas For P. Soumas Position Mgr. Latest Date 7.7.2000

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☒ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide .....

(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

08-15-2000

Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. THIS APPROVAL IS ONLY FOR THE EXISTING STOCK PILE TO REMAIN AND DOES NOT ALLOW ANY GRADING ACTIVITIES NOR RELOCATION OF THE STOCK PILE.
2. THIS APPROVAL EXPIRES ON 08-15-2001.
3. NO MORE NEW IMPORT OR EXPORT

LA Department of Building and Safety
LA 05 17 011581 07/07/00 11:09AM
BOARD APPLIC FEE $100.
PLAYA VISTA PROJ
Total Due: $100.
(Cashier Use Only) $100.
NO FEE NO FEE
Name: PLAYA CAPITAL COMPANY
Addr: 1255 JEFFERSON BLVD #300
Auth: PLAYA VISTA PROJ
Dept: PLAYA VISTA PRO

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name

City ... Building and Safety

☐ REQUES... MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 8118

DISTRIBUTION

☐ Owner ☐ ..... Pl Ck.
☐ Petitioner ☐ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2+3 BLK

TRACT 12672

1

Owner Playa Capital Company, LLC
Address 1255 Jefferson Blvd. #300
Los Angeles CA Zip 90066
Daytime Phone (310) 822-0074

Petitioner Psomas
Address 11444 W. Olympic Blvd #750
W. Los Angeles CA Zip 90064
Daytime Phone (310) 954-3745

District Office W-LA
Plan Ck No. .....
Zone .....
Permit No. .....
Job Order No. .....
Bureau/Division Grading
Use of Bldg. .....
Job Status .....

Type .....
Stories .....
Occ. .....
No. Units .....
F.D. .....
D.M. .....
C.D. .....

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To exten Grading Permit # 98 LA 77388 for temporary stockpile (300,000 CY) under approved modification # 6486, dated 7,24,98. For Location of stock pile see attached exhibit.

Dept. Comment

Code Sections: L.A.M.C.—

Title 24—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

stockpile still required for dirt to fill Tracts 49104-01 and 02 when Court decision is made

Petitioner's Signature [signature] Position For Psomas Moe Lahooti Date 7,7,2000

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☐ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.

☐ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.

☐ Condition (DOES) (DOES NOT) provide .....
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By

Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

LA Department of Building and Safet
LA 05 17 011581 07/07/00 11:09AM
BOARD APPLIC FEE $10
PLAYA VISTA PROJ
Total Due: $10
(Cashier Use Only) $10
NO FEE NO FEE NO FE
Name: PLAYA VISTA PROJ
Addr: 1255 JEFFERSON BLVD #300
Auth: PLAYA VISTA PROJ
Dept: PLAYA VISTA PROJ
Fee due: 8/10/00
Fee verified

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

☐ ~~REQUEST~~ FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

or above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY | FILE NO. 9022

DISTRIBUTION
☒ Owner ☒ ..... Plck.
☒ Petitioner ☒ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS	6775 Centinela Ave	LOT(S)	2 & 3	BLK
		TRACT	12672	

Owner ... Playa Capital Company, LLC
Address ... 2255 E. Imperial Hwy. #300
... Los Angeles ... CA Zip ... 90059
1 Daytime Phone (310) 822-0074
Petitioner ... Thomas ...
Address ... 11444 W. Olympic Blvd #750
... Los Angeles ... CA Zip ... 90064
Daytime Phone (310) 954-3700 (MOE)

District Office ... W. L.A. ... Type ...
Plan Ck No. ... Stories ...
Zone ... Occ. ...
Permit No. ... No. Units ...
Job Order No. ... Eng/Plck F. D. ...
Bureau/Division ... Grading D. M. ...
Use of Bldg. ... Stockpile C. D. ...
Job Status ...

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To extend Grading Permit # 98LA77388 for temporary Stockpile (300,000 CY) under approved modifications #6486 dated 7/24/98 and # 8118 dated 8/15/2000

Dept. Comment: Extension of Time

Code Sections: L.A.M.C. – 91.7011.3

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Title 24 –

Stockpile still required for dirt to complete Grading work on Project.

Petitioner's Signature ... Position ... For Thomas Date 8/17/01

Reviewed By ... Date ...

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By: Edna Latrell — LA Department of Building and Safety — 8/19/01

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. The approval is only for the existing stock pile to remain and does not allow any grading activities nor relocation of the stockpile.
2. This approval expires on 8/15/02.
3. Only removal of soil from existing Stockpile is allowed.

BOARD APPLIC FEE $100.0

Total Due: $100.0
No Fee: $100.0

NO FEE NO FEE NO FEE
Name: PLAYA CAPITAL CO., LLC
Addr: 6775 CENTINELA AV
Auth: FEE WAIVER
Dept: PLAYA VISTA

(Cashier Use Only)
No. of Items 1 #100.00
Fee due ...
Fee verified ...

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

☐ REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 10007

DISTRIBUTION

☒ Owner ☒ ..... Pl Ck.
☒ Petitioner ☒ ..... Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2+3 BLK

TRACT 12672

1

Owner Playa Capital Company, LLC
Address 12555 Jefferson Blvd #300
Los Angeles CA Zip 90066
Daytime Phone (310) 822-0274

Petitioner P. Somas
Address 11444 W. Olympic Blvd #750
Los Angeles CA Zip 90064
Daytime Phone (310) 954-3700 (MOE)

District Office W.LA
Plan Ck No.
Zone
Permit No.
Job Order No. ENG/PLCK
Bureau/Division Grading
Use of Bldg. Stock Pile
Job Status

Type
Stories
Occ.
No. Units
F.D.
D.M.
C.D.

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

To extend Grading Permit # 98LA77388 for temporary Stock Pile (300,000 CY) under approved modifications #6486 dated 7,24,98 and # 8118 dated 8,15,2000 and Modification # 9022 Dated 8,16,01.

Dept. Comment Extension of Time

Code Sections: L.A.M.C.— 91.7011.3

Title 24—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Stock Pile still required for dirt to complete Grading work on Project.

Petitioner's Signature [signature] Position For P. Somas Date 8,15,2002

Reviewed By ..... Date .....

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ ~~Denied (See reverse for appeal information.)~~

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) (~~IS NOT~~) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... [signature] 8/19/02
(EQUIVALENCY) (EQUIVALENT FACILITATION)

Department Action By ..... Date .....

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1. The approval is only for the existing stock pile to remain and does not allow any grading activities nor relocation of the stock pile.
2. This approval expires on 8/15/03
3. Only removal of soil from existing stockpile is allowed.

LA Department of Building and Safety
[illegible] 08/19/02 10:18AM
BOARD APPLIC FEE $100.00
Total Due: $100.00
Fee Paid $100.00
(Cashier Use Only)
NO FEE NO FEE NO FEE
Name: PLAYA CAPITAL COMPANY
Addr: 6775 CENTINELA
Fee due $100.00
FEE WAIVER
Dept: PLAYA VISTA
Reverified

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X .....

G

CITY OF LOS ANGELES - DEPARTMENT OF BUILDING AND SAFETY
APPLICATION FOR GRADING PERMIT AND FOR
GRADING CERTIFICATE

** PLEASE TYPE OR PRINT IN INK CLEARLY **

A JOB ADDRESS: 6775 Centinela Avenue
SUITE/UNIT NO:
CROSS STREETS: Centinela & Jefferson
TRACT: 12672
BLOCK:
LOT(S): 2 & 3
ARB:
UNIT:
ASSESSOR'S NO:
TYPE: Interior
ZONE: M
ALLEY:
BUILDING LINE:
SEISMIC STUDY ZONE:
COUNTY REF: MP250-28/29
SIZE: Acerage
FIRE DISTRICT: II
GRADING: yes
HIGHWAY DED:
FLOOD ZONE:
DIST MAP: 105B165
APPROVALS, EASEMENTS AND RESTRICTIONS: ZI 1312, 1320, 1802, AHA (see map)
DIST OFFICE: ☐ METRO ☐ VAN NUYS ☒ W LA ☐ WILSHIRE ☐ SAN PEDRO ☐ W VALLEY
CENSUS TRACT: 2753.12
COUNCIL DIST: 6

B BLDG. OWNER: Maguire Thomas Partners (310) 822-0084
ADDRESS: 13250 Jefferson Blvd
SUITE/UNIT NO:
CITY/STATE/ZIP: Marina Del Rey, CA 90295
CIVIL ENGINEER NAME: Psomas & Assoc
ADDRESS:
ENGR. GEOLOGIST: Law Crandall
SOIL ENGINEER: Law Crandall
GEN. CONTR: -N/S-
APPLICANT: Howard Hughes Realty (310) 4175030
ADDRESS: 6701 Center Drive West
SUITE/UNIT NO:
CITY/STATE/ZIP: Los Angeles, CA 90045
ACTIVE STATE LIC NO: 32799
CITY BUS LIC NO:
PHONE NO: (310) 450-1217
(213) 889-5300
(213) 889-5300
( )

DESCRIPTION OF GRADING WORK: To add 74,500 cubic yards to existing temporary stockpile. Import from tract #43415, 7300 Dumbarton Av, work THIS site under SEPARATE permit. PC #AA9511

C PURPOSE OF GRADING: (60) Stockpile (temporary)
CUBIC YARDS: CUT — FILL 74,500 (GP) — IMPORT 74,500
MAX SLOPE: CUT — FILL 2:1
CAL. ENVIRONMENTAL QUALITY ACT: ☐ EXEMPT ☐ COMPLETE
RETAINING WALL REQ'D: ☐ YES ☒ NO
HEIGHT:
BOND: ☐ CASH ☐ SURETY
AMOUNT: NO BOND REQ'D PER S. FAN
EXPORT:
CAP:
IMPORT:
DATE POSTED:

LIST ALL APPLICABLE REPORTS, DEPT LETTERS AND RESPECTIVE DATES: 1. No public streets will be used to import material unless Haul Route permit is obtained. 2) A conveyor system or any other method of dirt transportation over private property is subject to review, approval and acceptance by the owner

CHECK NOTES, SUPERINTENDANT AND AFFIDAVITS: Administrative modification issued on 12/8/94, for extension of time & additional yardage for existing temporary stock pile area. Total cubic yards of temporary stock pile area will be 1,159.00 c.y. Both additional & existing stock pile permitted to remain on site until 12/8/95.

D P.C. NO.: CC
EVENT CODE:
SUPPLEMENT TO PERMIT NO: 95LA04636
HILLSIDE POSTING:
ZONING VERIFIED BY: [signature] DATE: 5-9-95
BOARD FILE NO:
PRE-INSPECTION:
GRADING PRE-INSPECTION BY: DATE:
PLAN CHECKED BY: DATE:
OAK TREE WSP:
APPLICATION APPROVED BY: A. GONG
PRINT: RICARDO TRES
BSD: 94229
PLAN CHECK: 93.50
SIGN: [signature]
DATE: 5-9-95
SUPP PLAN CHECK:
FOR DEPT. USE ONLY
PLAN MAINT:
GRADING PERMIT: 5400.00
SURCHARGES: 609.29
SUPP SURCHARGES:
ADDL INSPECTION:

PLOT PLAN ATTACHED ☒ YES ☐ NO

Unless a shorter period of time has been established by an official action, plan check approval expires one and a half years after the fee has been paid. The permit expires two years after the fee has been paid or 180 days after the fee has been paid and construction has not commenced, or if work is suspended, discontinued or abandoned for a continuous period of 180 days (Sec 98.0603 L.A.M.C.). Claims for refund of fees paid on permits must be filed within one year from the date of expiration or building permits granted by the Department of Building and Safety (Sec. 22.18 & 22.13 L.A.M.C.)

B & S 08-8-95 Rev. 1/98

FOR CASHIER'S USE ONLY

95LA 35217

05/09/95 04:37:20PM LA05 T-7592 C 10

GRADING PLAN C	93.50
GRADING PERMIT	5,400.00
INVOICE # 0094229 BB	
SYS DEV	329.61
ONE STOP	109.87
MISCELLANEOUS	5.00
CITY PLAN SURC	164.81
TOTAL	6,102.79
CHECK	6,102.79

BUREAU OF ENGINEERING

SEWERS
AVAILABLE
NOT AVAILABLE
SEWER RESERVATION NO.
SEWER CERTIFICATE NO.

PLANNING WORKSHEET NO.
APPROVED UNDER CASE NO.
LANDSCAPE/FIRESCAPE
SITE PLAN REVIEW

ACCESS
DRIVEWAY
FLOOD
CURB RAMP
HIGHWAY DED.
REQUIRED
COMPLETED

FIRE DEPT.
APPROVED
HYDRANT
UNDERGROUND TANK REMOVAL
DRIVEWAY LOCATION
ORD. NO.

NO GRADING BOND REQUIRED FOR TEMPORARY STOCK PILE PER S. FAN ON 5-9-95. A GRADING BOND WILL BE SECURED FOR GRADING WORK @ BORROW SITE, TRACT 43415.

EASEMENT MAINTENANCE CERTIFICATION

X DOUGLAS J GARDNER X [signature] X 5/5/95 ☒ OWNER ☐ AUTHORIZED AGENT

LICENSED CONTRACTOR AND WORKERS' COMPENSATION DECLARATION

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL AND SHALL BE SUBJECT TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS ($100,000), IN ADDITION TO THE COST OF THE COMPENSATION DAMAGES AS PROVIDED FOR IN SECTION OF THE LABOR CODE, INTEREST AND ATTORNEY'S FEES.

3 CONSTRUCTION LENDING AGENCY

4 ASBESTOS REMOVAL

5 OWNER-BUILDER DECLARATION

X DOUGLAS J GARDNER X [signature] X 5/5/95 ☒ OWNER ☐ AUTHORIZED AGENT

6 FINAL DECLARATION

X DOUGLAS J GARDNER X [signature] X 5/5/95 ☒ OWNER ☐ AUTHORIZED AGENT ☐ CONTRACTOR

CITY OF LOS ANGELES - DEPARTMENT OF BUILDING AND SAFETY

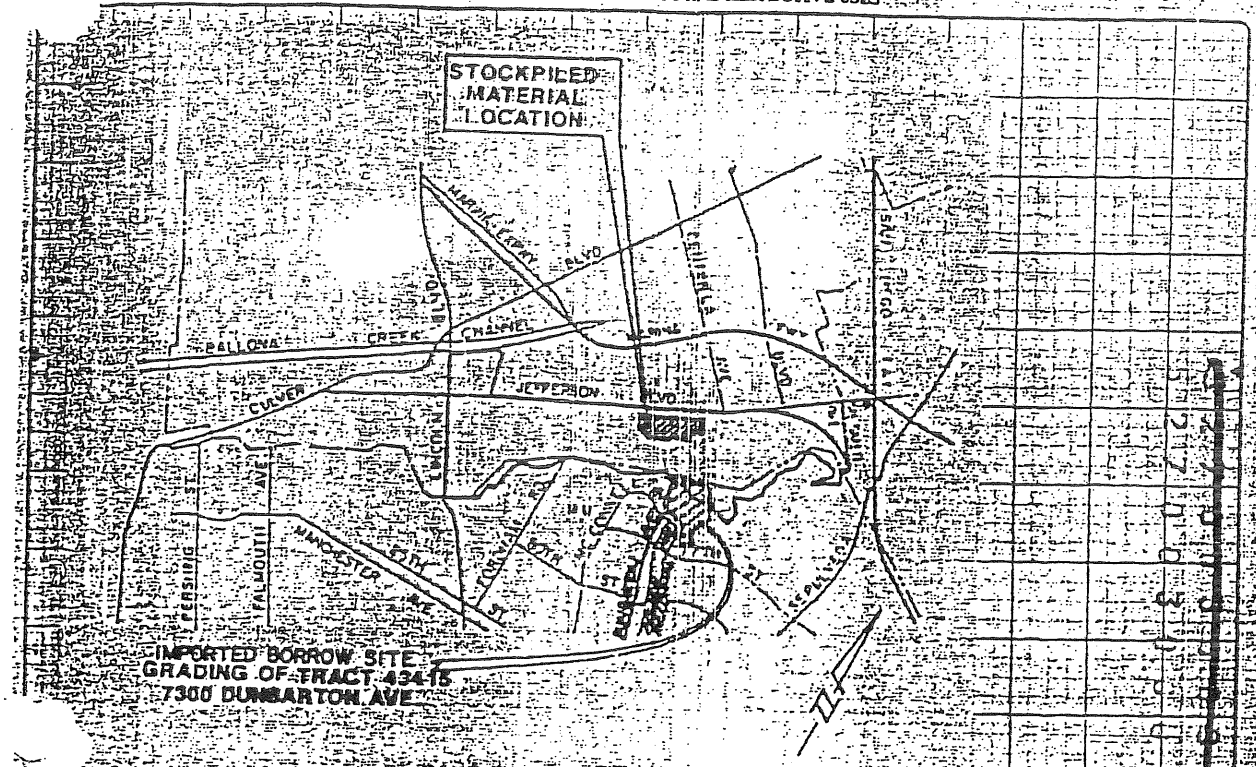
GRADING PERMIT AND GRADING CERTIFICATE - PLOT PLAN

PLEASE DRAW AND LABEL CLEARLY IN INK

LOT ADDRESS	STREET NO.	CROSS STREETS
6117 Centinela Avenue		Centinela & Jefferson

TRACT	BLOCK	LOT NO.	AREA	UNIT	ASSESSOR'S NO.
7267		2 & 7			

SHOW ALL BUILDINGS ON LOT AND RESPECTIVE USES



VICINITY MAP

NOT TO SCALE

DO NOT MARK IN THIS AREA

City of Los Angeles — Department of Building and Safety

☐ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY: [illegible]

FILE NO: 114

DISTRIBUTION

☒ Owner ☐ ..... Pl Ck.
☒ Petitioner ☒ W.LA ..... Insp.
☐ Fire ☐ Chalmers ..... Bur.
☐ Health ☐ .....

JOB ADDRESS: 6775 Centinela Ave

LOT(S): 2, 3 BLK

TRACT: 12672

Owner: Maguire Thomas Partner
Address: 13250 Jefferson Blvd
Marina Del Rey, CA Zip: 90295
Daytime Phone (310) 822-0084

1

Petitioner: Pronman & Associates
Address: 3420 Ocean Park Blvd
Santa Monica Zip: 90405
Daytime Phone (310) 4501217 — Ext 272

District Office: W.LA
Plan Ck No.:
Zone:
Permit No.:
Job Order No.:
Bureau/Division: Grading
Use of Bldg.:
Job Status: Stockpile

Type:
Stories:
Occ.:
No. Units:
F.D.:
D.M. 102-161
C.D. 4

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

1. Extension Time For Existing stock pile from 5/15/94 to 12/1/95
2. Import 74,500 C.Y during Grading activity on Tract 43415, 7300 Dunbarton Ave. and add it (Export 74,500 C.Y From Tract 43415) to exist stock pile under request #1

Dept. Comment: Increase yardage/Extend Existing

Code Sections: L.A.M.C.—

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY: Stockpile

Title 24— 91.7006

Total yardage of stockpile including existing & proposed addition will be 1,159,000 cy
Grading plan for Phase (1) of Playa Vista is under review by W.LA and will be submitted for your approval.

Petitioner's Signature: Moe Lahooti [signature] Position: P. Eng Date: 12/1/94

Reviewed By: [signature] Date: 12/1/94

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

[signature] Department Action By

12-8-94 Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1) A Grading permit G-3 shall be obtained for adding 74,500 CY to bring total stockpile to 1,159,000 cy. Said G-3 permit will allow both new & existing stockpile to stay on site until 12/8/95.
2) Comply with all conditions circled on the attached sheet.

(Cashier Use Only)

No. of Items: 1
Fee due: $30+30=60
Fee verified: [signature]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

X ..... Position ..... Date .....

Print Name .....

B & S COM-31 (R 1.88)

REQUEST FOR GRADING MODIFICATION
INSPECTORS WORKSHEET

DATE: 12-7-94

ADDRESS: 6775 CENTINELA AVE.

OWNER: MACGUIRE THOMAS PARTNERS

REQUEST: STOCKPILE

SITE CONDITIONS: LARGE STOCKPILE

INSPECTOR'S RECOMMENDATION:

☑ APPROVAL ☐ APPROVAL W/ CONDITIONS (EXPLAIN) ☐ DENIAL (EXPLAIN)

INSPECTOR'S COMMENTS: STOCKPILE LOOKS OK. NO EROSION PROBLEM. NATIVE PLANTS HAVE COLONIZED AREA.

PLOT PLAN

1114

CONDITIONS OF APPROVAL FOR TEMPORARY STOCKPILE

JOB ADDRESS 6775 Centinela Ave

1. A temporary stockpile permit shall be obtained.
2. The fill surface shall be surface rolled to control dust.
3. Erosion control measures shall be provided during the rainy season and shall be constructed to inhibit transportation of any loose fill material into the public storm system.
4. The fill shall be located a minimum of _____ feet from the property lines, shall not exceed _____ feet in depth, and shall have slopes no steeper than (2) (3) to one.
5. This approval shall be limited to (one year) (six months) maximum.
6. All loose fill and debris shall be removed from the temporary stockpile site at the end of the approved time period.
7. Plans for the temporary stockpile site shall be submitted and approved prior to obtaining stockpile permit.

JM:jar
TGR07029?TS/3GR

(2)

City of Los Angeles — Department of Building and Safety

☑ REQUEST FOR MODIFICATION OF BUILDING ORDINANCES (98.0403 L.A.M.C.)

☐ REQUEST FOR ALTERNATE MATERIAL OR METHOD OF CONSTRUCTION (17951d H. & S.C.)

REQUEST FOR HARDSHIP EXEMPTION OR EQUIVALENT FACILITATION (19957 H. & S.C.)

For above requests, complete sections 1, 2, & 3 in duplicate by printing in ink or typing.

READ BY

FILE NO. 21169

DISTRIBUTION

☑ Owner ☐ ..... Pl Ck.
☑ ~~Petitioner~~ GIVEN ☑ GRADING Insp.
☐ Fire ☐ ..... Bur.
☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2 & 3 BLK

TRACT 12672

Owner Maguire Tomas Partner
Address 13250 Jefferson Blvd
Marina Del Rey Zip 90295
Daytime Phone (310) 822-0074

1

Petitioner M. Lahooti For Psomas & Associates
Address 3420 Ocean Park Blvd
Santa Monica, CA Zip 90405
Daytime Phone (310) 4601217 - EXT 361

District Office W.L.A. Type
Plan Ck No. B 87-227 Stories
Zone M(PV) Occ.
Permit No. No. Units
Job Order No. F.D. F
Bureau/Division BLDG/GRA D.M. 105B165
Use of Bldg. VACANT LOT C.D. 6
Job Status PROP - SCD

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Time Extension for Existing stockpile and exporting dirt from Tract 43415 to this stockpile. Total cubic yards of existing stockpile and additional per G Print 95LA35217 will be 1,159,000 C.Y. (74,500 CY)

Dept. Comment EXTENSION OF TIME

Code Sections: L.A.M.C. - 98.0604

Title 24 -

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

1) Grading on Tract 43415 is in progress
2) Grading on Playa Vista Project has not started yet.

Petitioner's Signature [signature] Position P.E. Date 12/6/95

Reviewed By A. Gong Date 12-8-95

DEPARTMENT ACTION: In accordance with ☑ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (~~See attached letter~~). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

A. Gong FOR S. FAN
Department Action By

12-8-95
Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

THIS APPROVAL IS FOR AN EXTENSION OF TIME TO COMPLETE WORK STARTED UNDER PERMIT NO. 95LA35217. TEMPORARY STOCKPILE SHALL BE PERMITTED TO REMAIN ON SITE UNTIL 12-8-96. EXPORT OF EARTH FROM TRACT NO 43415 TO THE TEMPORARY STOCKPILE SITE MAY CONTINUE UNTIL 12-8-96 PROVIDED EARTH MATERIAL IS NOT TRANSPORTED VIA PUBLIC WAY - SEE NOTES ON PERMIT NO. 95LA35217

12/08/95 02:54:05PM LAUS T-7652 C 06
BOARD APPLIC F 75.00
TOTAL 75.00
CHECK 75.00
(Cashier Use Only)

No. of Items 1
Fee due $75
Fee verified [initials]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION

(Signature, statement of reasons for appeal and filing fees are required.)

Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) — Bd. Res. No. 832

Print Name ..... Position ..... Date .....

B & S COM-31 (R 1/88)

JUN 05 96 11:41AM BUILDING & SAFETY

To: Mr Jacob Lipa
FAX (310) 4527411
Psomas & Associates
~: MOC

Department of Building and Safety
ICATION OF BUILDING
3 L.A.M.C.)
NATE MATERIAL OR METHOD
17951d H. & S.C.)
SHIP EXEMPTION OR
TION (19957 H. & S.C.)
e sections 1, 2, & 3 in duplicate by printing
Extension For Stock Pile

READ BY

FILE NO. 2653 (P/ Rev)

DISTRIBUTION
- ☑ Owner ☐ ..... PI Ck
- ☑ Petitioner ☑ GRADING Insp
- ☐ Fire ☐ ..... Bur
- ☐ Health ☐ .....

JOB ADDRESS 6775 Centinela Ave

LOT(S) 2 & 3 BLK
TRACT 12672 (MP250-28/29)

1
Owner Maguire Thomas Partner
Address 13250 Jefferson Blvd
Marina Delray, CA Zip 90295
Daytime Phone (310) 822-0074

Petitioner Psomas & Associates
Address 3420 Ocean Park Blvd
Santa Monica, CA Zip 90405
Daytime Phone (310) 450-1217 Ext 203
(310) 452-7411 (FAX)

District Office W.LA
Plan Ck No. CC
Zone M
Permit No. 93LA35217
Job Order No.
Bureau/Division Grd/WLA
Use of Bldg.
Job Status IN PROGRESS

Type
Stories
Occ.
No. Units
F.D. II
D.M. 105B165
C.D. 6

☐ YARD NOTICE (COM-784) RECEIVED FROM PETITIONER
☐ POSTCARD (COM-3) NAME/ADDRESS COMPLETED BY PETITIONER
☐ SIGN NOTICE RECEIVED FROM PETITIONER

2 REQUEST: Submit plans if necessary to illustrate request. Additional sheets or data may be attached.

Extension Time (2 years) For Existing Stock Pile which Permitted to remain on site until 12.18.95. (stock pile is 1,159,000 C.Y.) PER PERMIT NO. 93LA35217 & ADMINISTRATIVE MODIFICATION, DATED 12-8-94 (MOD. FILE NO. 1114)

Dept. Comment TIME EXTENSION

Code Sections: L.A.M.C. –
Title 24 –

3 JUSTIFICATION/FINDINGS OF EQUIVALENCY:

Grading plan for phase ① of Playa Vista Project is under review and Grading plan for phase ② will be submitted to for review and approval.

Petitioner's Signature [signature] Position Consultant for P/A P.E. Date 5.31.96

Reviewed By [signature] Date 5-31-96

DEPARTMENT ACTION: In accordance with ☐ Sect. 98.0403 L.A.M.C. ☐ Sect. 17951d H. & S.C. ☐ Sect. 19957 H. & S.C.

The Request is ☒ Granted (See attached letter). ☐ Denied (See reverse for appeal information.)

☐ Written concurrence from the (Fire) (Transportation) (Health) (.....) Dept. is required.
☒ Request (IS) (IS NOT) in conformity with the spirit and purpose of Code Section involved.
☐ Condition (DOES) (DOES NOT) provide ..... (EQUIVALENCY) (EQUIVALENT FACILITATION)

[signature] Department Action By

6-3-96 Date

Conditions Of Approval: (Reasons For Appeal in Case of Denial)

1) This extension of the stockpile approval is for 1 yr. only. All stockpiled material shall be removed offsite on or prior to 6/3/97

05/31/96 12:31:05PM LA05 T 2800 C 06
BOARD APPLIC F 75.00
TOTAL 75.00
CHECK 75.00
(Cashier Use Only)

No. of Items 1
Fee due $75
Fee verified [initials]

APPEAL OF DEPARTMENT ACTION TO BOARD OF BUILDING AND SAFETY COMMISSIONERS/HANDICAPPED ACCESS APPEALS COMMISSION
(Signature, statement of reasons for appeal and filing fees are required.)
Signature of Owner or Applicant submitting notarized declaration (B & S COMM-832) – Bd. Res. No. 832

X ..... Position ..... Date .....
Print Name .....

B & S COM-31 (R 1/88)

Exhibit "C"

12670 Jefferson Blvd

Permit #: 01030 - 10000 - 02066
Plan Check #:
Event Code:
Printed: 09/06/01 01:12PM

Grading

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 09/06/2001

Over the Counter Permit

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
RANCHO LA BALLONA		RAMONA S DE MACHADO 341.8441		D C C 2722 C F 64 MAP	099B157 487	4211 - 013 - 035

3. PARCEL INFORMATION
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Energy Zone - 6
Lot Size - IRR
Lot Type - Interior
Thomas Brothers Map Grid - 672
ZONE(S): C2, PV /

4. DOCUMENTS

5. CHECKLIST ITEMS
Storm Water - State SWPPP

LA DEPARTMENT OF BUILDING AND SAFETY
LA 05 08 036041 09/06/01 03:53PM

SYSTEMS DEVT FEE	$236.85
CITY PLANNING SURCH	$118.43
MISCELLANEOUS	$5.00
ONE STOP SURCH	$78.95
Total Due:	$439.23
Check:	$439.23

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION
Owner(s):
Playa Vista Land Partnership L P 13250 Jefferson Blvd LOS ANGELES CA 90094
Tenant:

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
grading for temporary erosion control 9000 cy CUT AND EXPORT.
SEE APPROVAL LETTER LOG 34607

9. # Bldgs on Site & Use

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By:
OK for Cashier: Eric Cabrera
Signature:
DAS PC By:
Coord. OK:
Date:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 13002066

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period
Permit Valuation: 9,000 cu yd PC Valuation: 2,000 cu yd

FINAL TOTAL Grading	4,386.73
Permit Fee Subtotal Grading	2,575.00
Plan Check Subtotal Grading	1,372.50
O.S. Surcharge	78.95
Sys. Surcharge	236.85
Planning Surcharge	118.43
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

LA Department of Building and Safety
LA 05 08 036040 09/06/01 03:52PM

GRADING PERMIT	$2,575.00
GRADING PLAN CHECK	$1,372.50
Total Due:	$3,947.50
No Fee:	$3,947.50

NO FEE NO FEE NO FEE
Name: PLAYA VISTA PROJECT
Addr: 12670 JEFFERSON BLVD.
Auth: WAIVED FEE LETTER
Dept: CITY PLANNING

01LA 17739

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

Excuse by cashier only

01LA 17739
09/06/01 15:52:18
LA05 T-036040 C 08
01030.10000.02066

PERMIT # | | | | | | - | | | | | | - | | | | | |

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		
FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		
ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

FOR INSPECTION REQUESTS, PLEASE CALL

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		
POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		
FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

12670 Jefferson Blvd

mit #: 01030 - 10001 - 02066
Plan Check #:
Printed: 08/13/02 08:10 AM
Event Code:

Grading
mmercial
n Check at Counter
No Submit Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 07/24/2002

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
RANCHO LA BALLONA		RAMONA S DE MACHADO 341.8509441	D C C 2722	C F 64 MAP 58099B157	487	4211 - 013 - 035

3. PARCEL INFORMATION

BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Energy Zone - 6
Lot Size - IRR

Lot Type - Interior
Thomas Brothers Map Grid - 672

ZONE(S): C2, PV /

LA Department of Building and Safety
LA 06 26 01651 08.13.02 08:10AM

ONE STOP SURCH	[illegible]
SYSTEMS DEVT FEE	[illegible]
CITY PLANNING SURCH	[illegible]
MISCELLANEOUS	[illegible]
Total Due:	$907.00
Check:	$907.00

4. DOCUMENTS

5. CHECKLIST ITEMS

Storm Water - State SWPPP

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Land Partnership L P — 13250 Jefferson Blvd — LOS ANGELES CA 90094

Tenant:

Applicant: (Relationship: Owner-Bldr)
- Owner-Builder

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

expand existing temporary erosion control basin C , construct maintenance road and dirt swales. 125000 cy cut 4500 cy fill. SEE APPROVAL LETTER LOG 37190 . this permit will expire 9/7/03. NO EXCAVATION CAN EXTEND BELOW THE WATER TABLE. excavation goes from elevation 19' to elevation 7'.

9. # Bldgs on Site & Use:

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Eric Cabrera
OK for Cashier: Eric Cabrera
DAS PC By:
Coord. OK:
Signature:
Date:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 13002066
Project Name: PLAYA VISTA

Building and [illegible]
LA 06 26 01651 08.13.02 [illegible]

GRADING PERMIT	[illegible]
GRADING PLAN CHECK	[illegible]
Total Due:	[illegible]
Check:	[illegible]

NO FEE NO F.E. NO FEE
Name: PLAYA VISTA
Addr: 12670 JEFFERSON BLVD
Name: PLAYA VISTA
Dept: PLAYA VISTA

[illegible]

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 125,000 cu yd
PC Valuation:

FINAL TOTAL Grading	9,107.00
Permit Fee Subtotal Grading	7,975.00
Additional Plan Check	225.00
O.S. Surcharge	164.00
Sys. Surcharge	492.00
Planning Surcharge	246.00
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

Plot Plan

Basin "E"

12680 Jefferson Blvd

Permit #: 01030 - 10000 - 02065
Plan Check #:
Event Code:
Printed: 09/06/01 01:12 PM

Jing

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Over the Counter Permit

Last Status: Ready to Issue
Status Date: 09/06/2001

1. TRACT	BLOCK	LOT(S)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
RANCHO LA BALLONA		RAMONA S DE MACHADO 341.8141		D C C 2722 C F 64 MAP	099B157 487	4211 - 013 - 035

3. PARCEL INFORMATION

BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Energy Zone - 6
Lot Size - IRR
Lot Type - Interior
Thomas Brothers Map Grid - 672

ZONE(S): C2, PV /

4. DOCUMENTS

5. CHECKLIST ITEMS

Storm Water - State SWPPP.

LA Department of Building and Safety
LA 05 08 036039 09/06/01 02:48PM

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Vista Land Partnership L P 13250 Jefferson Blvd LOS ANGELES, CA 90094

Tenant:

CITY PLANNING SURCH $109.4
MISCELLANEOUS $5.0
ONE STOP SURCH $72.9
Total Due: $406.2
Check: $406.2

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
grading for temporary erosion control 6300 cy CUT AND EXPORT
SEE APPROVAL LETTER LOG 34607

9. # Bldgs on Site & Use:

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
OK for Cashier: Eric Cabrera
Signature:
DAS PC By:
Coord. OK:
Date:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 13002065

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 6,300 cu yd PC Valuation: 2,000 cu yd

FINAL TOTAL Grading	4,053.73
Permit Fee Subtotal Grading	2,275.00
Plan Check Subtotal Grading	1,372.50
O.S. Surcharge	72.95
Sys. Surcharge	218.85
Planning Surcharge	109.43
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

LA Department of Building and Safety
LA 05 08 036038 09/06/01 02:48PM

GRADING PERMIT $2,275.00
GRADING PLAN CHECK $1,372.50
Total Due: $3,647.50
No Fee: $3,647.50
NO FEE NO FEE NO FEE
Name: PLAYA VISTA PROJECT
Addr: 12680 JEFFERSON BLVD.
Auth: WAIVED FEE LETTER
Dept: CITY PLANNING

@LA 1757

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

Plot Plan

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashier only

01LA 17737
09/06/01 15:46:00
LA05 T-036038 C 08
01030-10000-02065

PERMIT # _____-_____-_____

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		
FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		
ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK ON SIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		
POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		
FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

FOR INSPECTION REQUESTS, PLEASE CALL
1-(888)-LA-4-BUILD (524-2845)

Basin "A"

7800 Lincoln Blvd

Permit #: **01030 - 10000 - 02069**
Plan Check #:
Event Code:
Printed: 09/06/01 01:15 PM

Grading

Over the Counter Permit

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 09/06/2001

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
rancho la ballona			441	mr 3-204	99B157	4211 - 011 - 026
rancho la ballona			441	mr 3-204	99B157	4211 - 011 - 026
rancho la ballona			441	mr 3-204	99B157	4211 - 011 - 026

3. PARCEL INFORMATION

Airport Hazard Area - YES
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Census Tract - 2765.000
Energy Zone - 6
Highway Dedication - YES
Lot Size - IRR ACREAGE
Lot Type - Corner
Thomas Brothers Map Grid - 702

ZONE(S): C2(PV) /

4. DOCUMENTS

5. CHECKLIST ITEMS

Storm Water - State SWPPP

LA Department of Building and Safety
LA 05 08 036037 09/06/01 03:36PM

SYSTEMS DEVT FEE	$455.8
CITY PLANNING SURCH	$227.9
MISCELLANEOUS	$5.0
ONE STOP SURCH	$151.9
Total Due:	$840.7
Checks:	$840.7

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):

Tenant:

Applicant: (Relationship: Owner-Bldr)
- Owner-Builder

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
GRADING FOR TEMPORARY EROSION CONTROL 77000 C.Y. CUT AND EXPORT
SEE APPPROVAL LETTER 34607

9. # Bldgs on Site & Use:

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
DAS PC By:
OK for Cashier: Eric Cabrera
Coord. OK: _____
Signature:
Date:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: **13002069**

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 77,000 cu yd PC Valuation: 2,000 cu yd

FINAL TOTAL Grading	8,438.23
Permit Fee Subtotal Grading	6,225.00
Plan Check Subtotal Grading	1,372.50
O.S. Surcharge	151.95
Sys. Surcharge	455.85
Planning Surcharge	227.93
Planning Surcharge Misc Fee	5.00
't Issuing Fee	0.00

Sewer Cap ID: Total Bond(s) Due:

LA Department of Building and Safety
LA 05 08 036036 09/06/01 03:36PM

GRADING PERMIT	$6,225.0
GRADING PLAN CHECK	$1,372.5
Total Due:	$7,597.5
Ha Fee:	$7,597.5

NO FEE NO FEE NO FEE
Name: PLAYA VISTA PROJECT
Addr: 7800 LINCOLN BLVD.
Auth: WAIVED FEE LETTER
Dept: CITY PLANNING

01LA 17735

12. ATTACHMENTS

Plot Plan

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashier only

01LA 17735
09/06/01 15:36:15
LA05 T-036036 C 08
01030-10000-02069

PERMIT # | | | | | | - | | | | | | - | | | | | |

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		

FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		

GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		

ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		

POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		

FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

FOR INSPECTION REQUESTS, PLEASE CALL
1- (888) - LA-4-BUILD (524-2845)

AQMD Sign-Off Required ☐ YES ☐ NO

7800 Lincoln Blvd

Permit #: 01030 - 10001 - 02069
Plan Check #:
Event Code:
Printed: 10/18/01 09:32 AM

(8)

Grading

Over the Counter Permit

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 10/18/2001

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
rancho la ballona			441	mr 3-204	99B157	4211 - 011 - 026
rancho la ballona			441	mr 3-204	99B157	4211 - 011 - 026
rancho la ballona			441	mr 3-204	99B157	4211 - 011 - 026

3. PARCEL INFORMATION

Airport Hazard Area - YES
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Census Tract - 2765.000
Energy Zone - 6
Highway Dedication - YES
Lot Size - IRR ACREAGE
Lot Type - Corner
Thomas Brothers Map Grid - 702

ZONE(S): C2(PV) /

4. DOCUMENTS

5. CHECKLIST ITEMS

Storm Water - State SWPPP

LA Department of Building and Safety
LA 02 28 042007 10/24/01 04:17PM

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):

Tenant:

Applicant: (Relationship: Owner-Bldr)
- Owner-Builder

ONE STOP SURCH	[illegible]
SYSTEMS DEVT FEE	[illegible]
CITY PLANNING SURCH	[illegible]
MISCELLANEOUS	[illegible]
Total Due:	[illegible]
Check:	[illegible]

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
GRADING FOR TEMPORARY EROSION CONTROL 23000 C.Y. CUT AND EXPORT
SEE modification 9182 and approval letter 34607

9. # Bldgs on Site & Use:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
OK for Cashier: Eric Cabrera
Signature:
DAS PC By:
Coord. OK:
Date:

For Cashier's Use Only W/O #: 13002069

LA Department of Building and Safety
LA 02 28 042006 10/24/01 04:14PM

GRADING PERMIT	[illegible]
GRADING PLAN CHECK	[illegible]
Total Due:	[illegible]
No Fee:	[illegible]

NO FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 7800 LINCOLN BL
Auth: WAIVER
Dept: PLAYA VISTA

01LA 19838

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 23,000 cu yd PC Valuation: 2,000 cu yd

FINAL TOTAL Grading	5,663.23
Permit Fee Subtotal Grading	3,725.00
Plan Check Subtotal Grading	1,372.50
O.S. Surcharge	101.95
Sys. Surcharge	305.85
Planning Surcharge	152.93
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

Plot Plan

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashier only

01LA 19838
10/24/01 16:14:52
402 T-042806 C 28
01030 -10001 -02069

PERMIT # _____-_____-_____

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

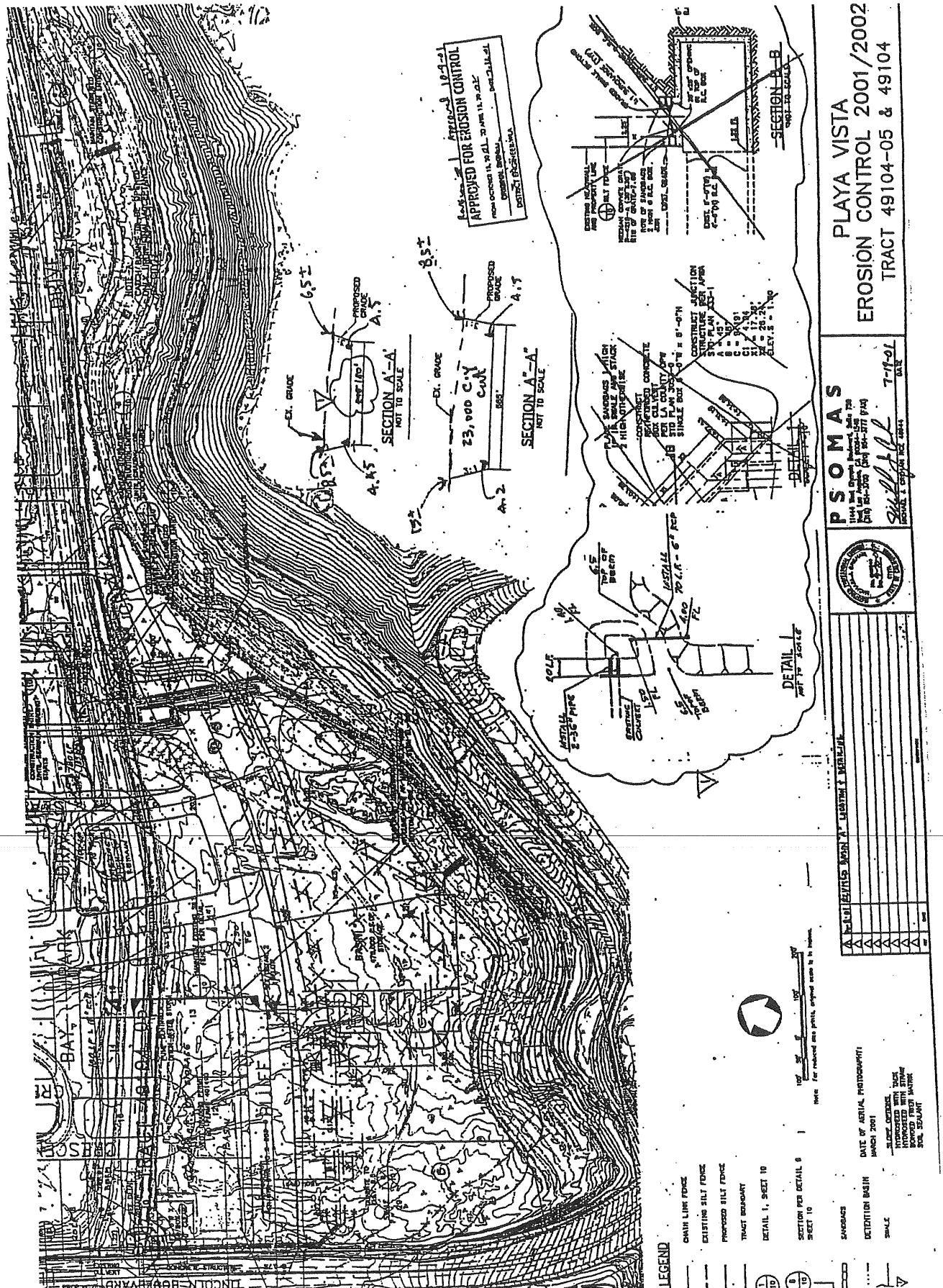
GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		
FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		
ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		
POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		
FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

FOR INSPECTION REQUESTS, PLEASE CALL
1- (888) - LA-4-BUILD (524-2845)

AQMD Sign-Off Required ☐ YES ☐ NO

PLOT PLAN ATTACHMENT



(DO NOT DRAW, WRITE, OR PASTE ATTACHMENTS OUTSIDE BORDER)

STORM WATER POLLUTION EROSION CONTROL PLAN NOTES:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN ON THE GRADING PLAN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED OR MODIFIED AS AND WHEN THE INSPECTOR SO DIRECTS AS THE WORK PROGRESSES.

2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED BY THE INSPECTOR.

3. WHEN THE INSPECTOR SO DIRECTS, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.

4. A.) VELOCITY CHECK DAMS SHALL BE PROVIDED ACROSS THE OUTLETS OF ALL LOTS DRAINING INTO THE STREET.
   B.) ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGE OF THE FILL.

5. STANDBY CREWS SHALL BE ALERTED BY THE PERMITEE OR CONTRACTOR FOR EMERGENCY WORK DURING RAINSTORMS.

6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING DOWNWARD, TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT SHALL NOT EXCEED THE FOLLOWING:

GRADE OF THE STREET	INTERVAL AS REQUIRED
LESS THAN 2%	100 FEET
2% TO 4%	50 FEET
4% TO 10%	25 FEET
OVER 10%	

7. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED STREET AREAS AT THE INTERVALS INDICATED ABOVE. VELOCITY CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS, TIMBER, OR OTHER EROSION-RESISTANT MATERIALS APPROVED BY THE INSPECTOR, AND SHALL EXTEND COMPLETELY ACROSS THE STREET OR CHANNEL AT RIGHT ANGLES TO THE CENTERLINE. EARTH DIKES MAY NOT BE USED AS VELOCITY CHECK DAMS.

8. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED GRADED CHANNELS AT THE INTERVALS INDICATED BELOW.

GRADE OF CHANNEL	INTERVALS BETWEEN CHECK DAMS
LESS THAN 3%	100 FEET
3% TO 6%	50 FEET
OVER 6%	25 FEET

9. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE MOUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHERE TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.

10. EXCEPT WHEN THE INSPECTOR DIRECTS OTHERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN RAIN IS FORECAST, AND SHALL BE MAINTAINED DURING THE RAINY SEASON (NOVEMBER 1 TO APRIL 15).

11. ALL BASINS AND CHECK DAMS SHALL HAVE THE DEBRIS AND SILT REMOVED AFTER EACH STORM TO RESTORE THEIR CAPACITY.

12. SANDBAGS SHALL BE STOCKPILED ON-SITE, READY TO BE PLACED IN POSITION WHEN RAIN IS FORECAST, OR WHEN THE INSPECTOR SO DIRECTS.

13. BRUSH AND GROUND COVER MAY NOT BE REMOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN NOVEMBER 1 AND APRIL 15.

14. IN CASE OF EMERGENCY, DURING BUSINESS HOURS, CALL PAT LARKIN, PLAYA CAPITAL CO. AT (310) 822-0074. DURING NON BUSINESS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ADDITIONAL STORM WATER POLLUTION EROSION CONTROL NOTES:

1. THE EROSION CONTROL MEASURES SHOWN HEREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT, BASED UPON CITY OF LOS ANGELES CRITERIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL OR MORE STRIGENT MEASURES ARE REQUIRED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS AVAILABLE IN THE CONSTRUCTION TRAILER.

2. ALL CUT AND FILL SLOPES ADJACENT TO PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT, UNLESS PLANTED, HYDROSEEDED, AND/OR STABILIZED THROUGH OTHER CONSTRUCTION MEATHODS APPROVED BY THE CONSTRUCTION MANAGER.

3. TOE OF ALL CONTRUCTION SLOPES SHALL BE PROTECTED WITH SILT FENCE, SANDBAGS OR OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

4. EROSION FROM BARE SOIL AREAS SHALL BE CONTROLLED WITH SOIL SEALANT, SANDBAGS AND/OR OTHER MEASURES AS APPROVED BY THE CONSTRUCTION MANAGER.

5. THE SOIL SEALANT MUST BE OF THE TYPE SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL (AS APPROVED BY THE CONSTRUCTION MANAGER).

REGISTERED PROFESSIONAL ENGINEER
MICHAEL DAVID READE
No. GE 2659
EXP. 6-31-02
GEOTECHNICAL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. CREHAN
No. C48944
Exp. 9-30-02
CIVIL
STATE OF CALIFORNIA

COMPLIANCE WITH THE GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES:

1. OWNER HAS FILED, WITH THE STATE WATER RESOURCES CONTROL BOARD, A NOTICE OF INTENT (NOI) TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES (GENERAL PERMIT). IN ACCORDANCE WITH THE REQUIREMENTS OF THE GENERAL PERMIT, OWNER HAS PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) FOR THE PROJECT.

2. OWNER RECOGNIZES THAT THE PHYSICAL CHARACTERISTICS OF THE PROJECT SITE, THE PLANNED SITE IMPROVEMENTS, AND THE MEANS, METHODS, AND SEQUENCE OF WORK SELECTED BY THE CONTRACTOR MAY AFFECT THE QUALITY OF STORM WATER DISCHARGES FROM THE SITE, BOTH DURING AND AFTER CONSTRUCTION ACTIVITY. ACCORDINGLY, THE SWPPP FOR THE PROJECT REQUIRES IMPLEMENTATION OF POLLUTANT CONTROL PRACTICES AT THREE LEVELS: 1) SPECIFIC MANDATORY PRACTICES THAT MUST BE IMPLEMENTED AS SPECIFIED; 2) ALTERNATIVE MANDATORY PRACTICES WHERE THE CONTRACTOR SELECTS FROM LISTED PRACTICES THE ALTERNATIVE THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK; AND 3) PRACTICES WHERE THE CONTRACTOR SELECTS THE CONTROL PRACTICES THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP; HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NON COMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.

2. EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.

OWNER

PLAYA CAPITAL COMPANY
12555 W. JEFFERSON BLVD.
LOS ANGELES, CA 90066
(310) 822-0074

PROJECT ADDRESS

MAJOR STOCKPILE- G.P. #98LA78695

300,000 CY STOCKPILE EAST OF MAJOR STOCKPILE
49104-04 ROADWAY GRADING #BC-401456
52092 ROADWAY GRADING #BC-401451

6775 W. CENTINELA AVE.
LOS ANGELES, CA 90056

TEMPORARY PARKING LOT #98LA77131 #98LA77133

1240D W. JEFFERSON BL.
LOS ANGELES, CA 90094

49104-01 STOCKPILE (FORMER) #95LA38748 #95VN86145 #98LA84085

49104-01 ROAD GRADING #95VN86145 BC#401367

49104-01 LOT GRADING #98LA76021
49104-02 STOCKPILE #00LA94539
49104-02 LOT GRADING #00LA95575 #00LA95576

13250 W. JEFFERSON BL.
LOS ANGELES, CA 90094

SURCHARGE W/ OF LINCOLN #98LA77303 #98LA77304

13462 W. JEFFERSON BL.
LOS ANGELES, CA 90094

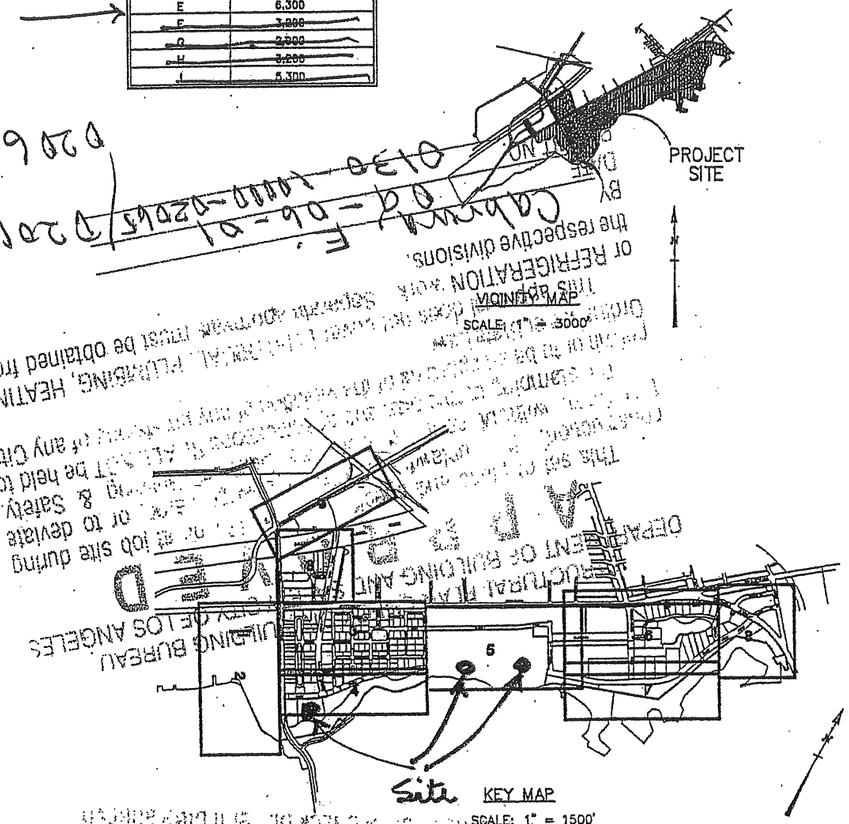
49104-03 INCREMENT 1 2, & 3 LOT GRADING #98LA86678 #99LA82049 #00LA91983

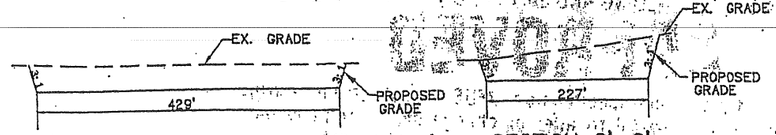
49104-03 ROAD GRADING BC#401424
13255 W. JEFFERSON BLVD
LOS ANGELES CA 90066

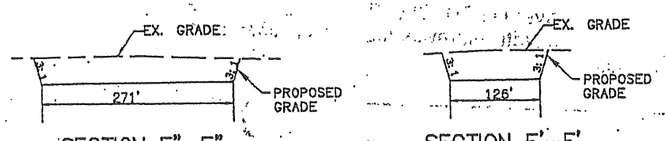
49104-05 STOCKPILE #99LA84085
5390 S. LINCOLN BLVD.
LOS ANGELES CA 90094

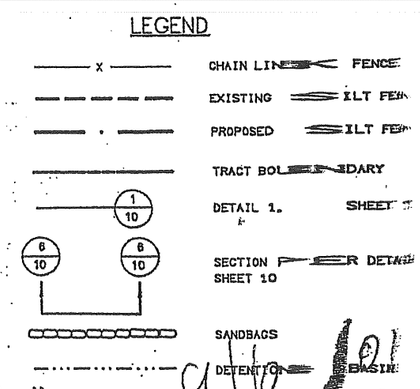
EARTHWORK QUANTITIES:

BASIN NAME	CUT (C.Y.)
A	77,000
B	23,500
C	9,000
D	2,600
E	6,300
F	3,200
G	2,900
H	3,200
I	5,300









Grading For Basins A, C & E"

NO.	DATE	BY	DESCRIPTION
1	4-10-01		CO20

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

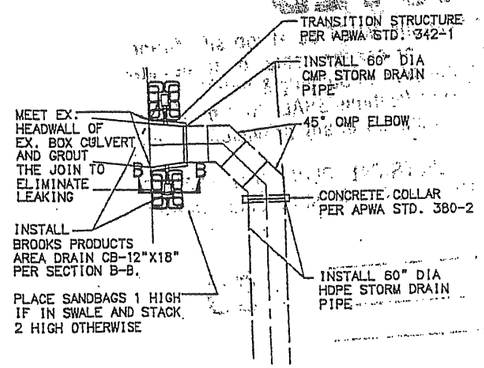
PLAYA VISTA AREA D
EROSION CONTROL 2001/2002

FRESHWATER MARSH
SEE SHEET 2

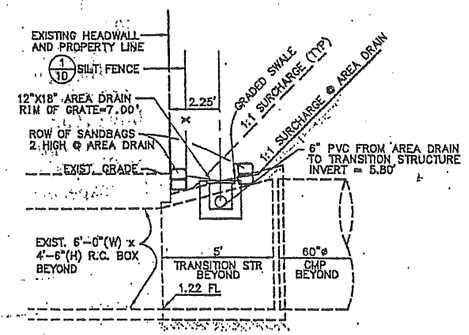
SEE SHEET 3

SECTION A'–A'
NOT TO SCALE

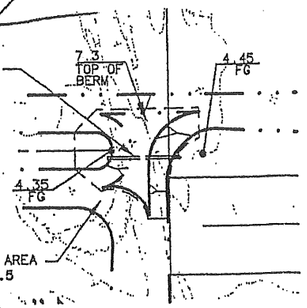
SECTION A"–A"
NOT TO SCALE



DETAIL 1
SCALE: 1"=10'



SECTION B–B
NOT TO SCALE



DETAIL 2
SCALE: 1"=40'

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL 6 SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE

DATE OF AERIAL PHOTOGRAPHY: MARCH 2001

SLOPE OPTIONS

100' 50' 0' 100' 200'

Note: For reduced size prints, original scale is in inches.

REGISTERED PROFESSIONAL ENGINEER MICHAEL DAVID READER No. RE 23567 EXP. 3-31-02 GEOTECHNICAL STATE OF CALIFORNIA 9-5-01

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. C48944 Exp. 9-30-04 CIVIL STATE OF CALIFORNIA 9-6-01

APPROVED
STRUCTURAL PLAN CHECK DIV./BUILDING BUREAU
DEPARTMENT OF BUILDING AND SAFETY-CITY OF LOS ANGELES
This set of plans and specifications must be at job site during construction. It is unlawful to alter the design or to deviate therefrom without approval from the Dept. of Building & Safety. ALL NOT be held to

Basin "A" Site

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

PLAYA VISTA
EROSION CONTROL 2001/2002

PROJECT NO. 1PCC020454
SHEET 2

MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 10

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE. INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE. INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE. INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 10

GRADED SWALE PER DETAIL S=0.092 FT/FT

OPTIONAL BASIN "D"

SILT FENCE OPTIONAL

TEMPORARY DETENTION AREA
VOLUME=1.1 AF MAX WS EL=14.7
BOTTOM EL=11.7 TOP OF BERM EL=13.7

RISER

18" - 2" CPC

74" RCP

EXISTING BERM GRADED UNDER PERMIT 98LA77388

CONSTRUCT SWALE PER DETAIL

INSTALL SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOP OF SLOPE AS REQUIRED BY INSPECTOR.

PROVIDE SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

PROVIDE SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

EXIST. 36" HDPE PIPE

EXIST. 36" HDPE PIPE

INSTALL SPILLWAYS DOWN FROM LOW SPOTS PER CONTRACTOR

EXIST. 36" HDPE PIPE

CONSTRUCT SWALE PER DETAIL

INSTALL SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOP OF SLOPE AS REQUIRED BY INSPECTOR

CONSTRUCT SWALE PER DETAIL

CONSTRUCT SWALE PER DETAIL

SILT FENCE OPTIONAL

RISER W/ ORIFICE 24"x3"

24" RCP

OPTIONAL BASIN "F"

TEMPORARY DETENTION AREA
VOLUME=1.7 AF MAX WS EL=16.6
BOTTOM EL=13.6 TOP OF BERM EL=16.6

INSTALL 36" HDPE

PROVIDE CMU BLOCK BULKHEAD TO SEAL PIPE. MAKE CONNECTION TO 36" OVERFLOW DRAIN. SEAL OPENING WITH GROUT. PUMP STORM DRAIN AFTER STORM

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5/10. SEE NOTE "A" BELOW. TYPICAL FOR ON-SITE CATCH BASINS.

WILLENHALL

SEE SHEET 13

OPTIONAL SWALE

POTENTIAL FUTURE STOCKPILE/AREA PER MODIFICATION NO. 8543

INSTALL SILT FENCE PER DETAIL

AREA D2

SEE SHEET FOR SECTION

PUMP DETENTION BASIN AFTER STORMS

SILT FENCE OPTIONAL

BASIN "C"

INSTALL TEMPORARY 10' WIDE BY 10' LONG EROSION GRAVEL BLANKET FOR OVERFLOW

OPTIONAL BASIN "B"

SILT FENCE OPTIONAL

GRADED SWALE PER DETAIL

MAINTAIN SILT FENCE PER DETAIL

EX. STORM DRAIN

CONSTRUCT SWALE PER DETAIL

TEMPORARY DETENTION AREA
VOLUME=5.1 AF MAX WS EL=11.5
BOTTOM EL=8.6 TOP OF BERM EL=N/A

SEE SHEET FOR SECTION

BASIN "E"

PUMP DETENTION BASIN AFTER STORMS

SILT FENCE OPTIONAL

MAINTAIN EXISTING SILT FENCE PER DETAIL

TEMPORARY DETENTION AREA
VOLUME=2.73 AF MAX WS EL=9.7
BOTTOM EL=6.2 TOP OF BERM EL=N/A
BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT

TEMPORARY DETENTION AREA
VOLUME=5.1 AF MAX WS EL=8.6
BOTTOM EL=5.6 TOP OF BERM EL=8.6
BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT

PROPOSED CONSTRUCTION TRAILER AREA

SEE SHEET

OPTIONAL BASIN "G"

EXTEND 48" PIPE BY 40'

2.5% PVC 10.40 INV

TEMPORARY DETENTION AREA
VOLUME=1.57 AF MAX WS EL=12.1
BOTTOM EL=10.4 TOP OF BERM EL=12.1

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5/10. SEE NOTE "A" BELOW. TYPICAL FOR ON-SITE CATCH BASINS.

TWO EXISTING 18" HDPE STORM DRAIN PIPES TO REMAIN

MAINTAIN EX. AREA DRAIN (TC=12.5) (FL=7.8 OUT) (FL=7.0 IN)

MAINTAIN EX. AREA DRAIN (TC=10.5) (FL=8.7 OUT) (FL=8.7 IN)

EXISTING 54" HDPE STORM DRAIN PIPE TO REMAIN

SLOPE VARIOUS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

Basin "C" Site

Basin "E" Site

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. OBERMAN No. C48944 Exp. 9-30-04 CIVIL STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER MICHAEL DAVIS No. 2258 EXPIRE 6-31-02 GEOTECHNICAL STATE OF CALIFORNIA

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL SHEET 10
- SANDBAGS
- DETENTION BASIN

NOTE:
EXACT DETENTION BASIN SHAPE AND LOCATION TO BE DETERMINED BY FIELD CONDITIONS. SWALES FOR DRAINAGE TO BE LOCATED PER FIELD CONDITIONS TO REDUCE/ELIMINATE PONDING EXCEPT IN DESIGNATED TEMPORARY DETENTION AREAS. BASINS TO BE INITALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT.

Note: For reduced size prints, original scale is in inches.

DATE OF AERIAL PHOTOGRAPHY: MARCH 2001

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

PLAYA VISTA
EROSION CONTROL 2001/2002
TRACT 49104-01 & 52002

PROJECT NO. 1PCC020454

SHEET 3 of 12

BOARD OF
BUILDING AND SAFETY
COMMISSIONERS

MABEL CHANG
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CALIFORNIA

JAMES K. HAHN
MAYOR

DEPARTMENT OF
BUILDING AND SAFETY
201 NORTH FIGUEROA STREET
LOS ANGELES, CA 90012

ANDREW A. ADELMAN
GENERAL MANAGER
TOM WHELAN
EXECUTIVE OFFICER

September 6, 2001

LOG # 34607
SOILS FILE - 2

Playa Capitol Company
1255 W. Jefferson Blvd., #300
Los Angeles, CA 90066

TRACT: Rancho La Ballona (MR3-204) / Rancho La Ballona (MR3-204/209
LOT: ARB 441 / Ramona 5 De Machado 246.03065 acres
LOCATION: 7800 Lincoln Blvd. / 12670 & 12680 W. Jefferson Blvd.

CURRENT REPORT/LETTER(S)	REPORT NO.	DATE(S) OF DOCUMENT	PREPARED BY
Soil Report	----	09/04/2001	Psomas/GDC

The referenced report providing recommendations for the proposed temporary erosion control detention basins has been reviewed by the Grading Section of the Department of Building and Safety.

According to the report the project consists of excavating three basins and construction of temporary swales. Basin "A" will be constructed at 7800 Lincoln Blvd., Basin "C" at 12670 W. Jefferson Blvd., and Basin "E" at 12680 W. Jefferson Blvd. The consultant recommends the depth of the basins of approximately 3 feet. The slope of the excavations will be not steeper than 3:1 (horizontal to vertical). The consultant stated, that the basins will be in operation for two years.

The proposed project is an exempt project for the purpose of the State of California Public Resources Code, Section 2690 et seq. (Seismic Hazard Mapping Act).

The report is acceptable, provided the following conditions are complied with during site development:

1. All recommendations of the report which are in addition to or more restrictive than the conditions contained herein shall also be incorporated into the plans for the project.

2. This approval is valid for two years, as requested. The approval expires on 09/07/2003.

3. The export from Basin "A" shall not exceed 77,000CY, Basin "C" 7,000CY and Basin "E" 6,300CY, as recommend.

4. All new fill slopes shall be no steeper than 2:1.

5. The soils engineer shall review and approve the detailed plans prior to issuance of any permit. This approval shall be by signature on the plans which clearly indicates that the soils engineer has reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in his report.

6. A grading permit shall be obtained for site grading.

7. The slope of the excavation shall not exceed 3:1 (horizontal to vertical), as recommended

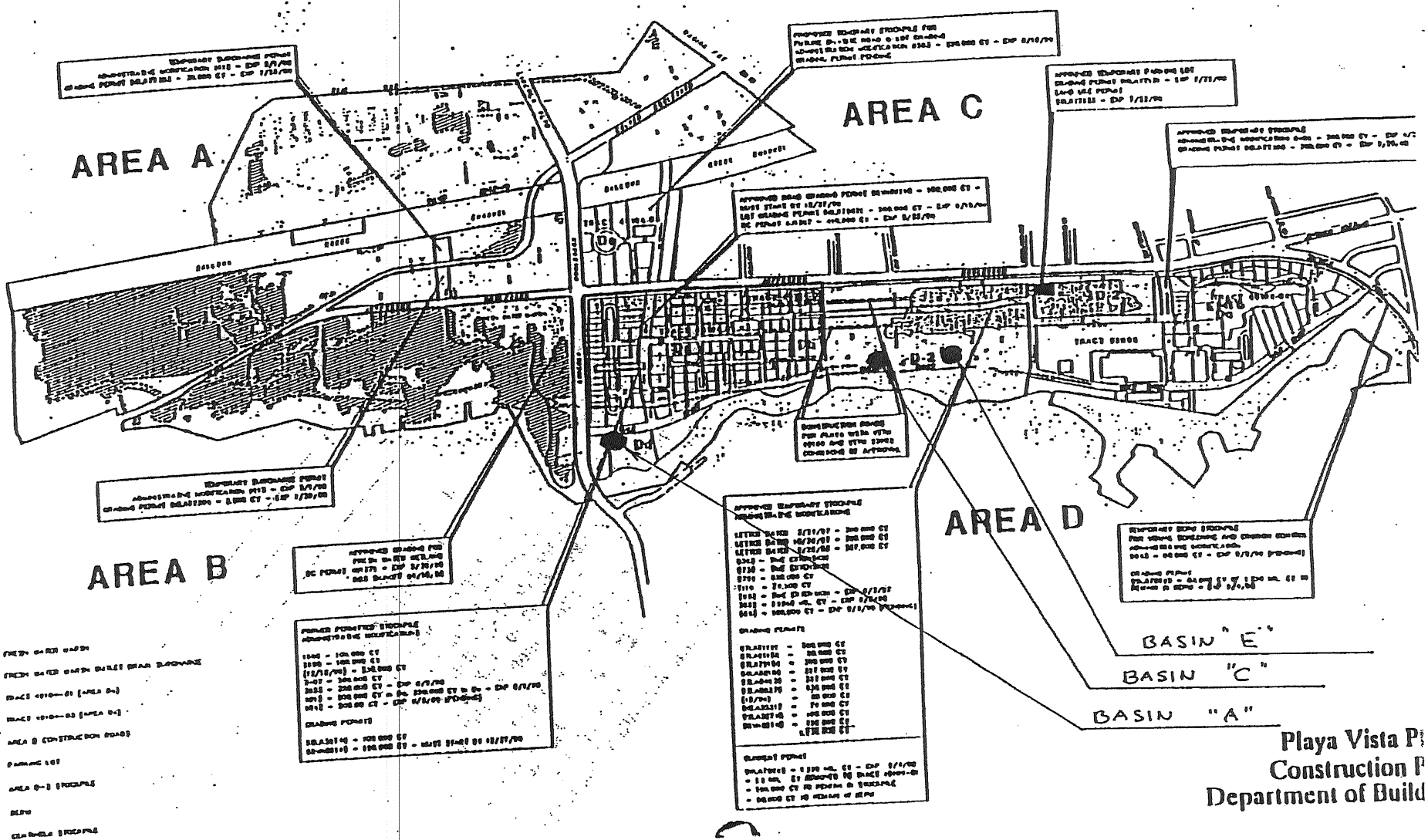
8. Adequate temporary erosion control devices acceptable to the Department, and if applicable the Department of Public Works, shall be provided and maintained during grading.

DAVID HSU
Chief of Grading Section

ANDRZEJ T. SZPIKOWSKI
Geotechnical Engineer I

ATS/ats
34607
(213) 977-6329

cc: Psomas/Group Delta Consultants
WLA District Office



Playa Vista P
Construction P
Department of Build

TRACT : RANCHO LA BALLONA
LOT : ARB 441 / RAMONA 5 DE MACHADO
LOG # 34607

ED SURFACE OF THE STREET. SANDBAGS ARE
ND STRETCHER COURSES. THE INTERVALS
SHALL DEPEND ON THE SLOPE OF THE GROUND
WING:

AL
QUIRED
FEET
FEET
FEET

) IN ALL UNPAVED STREET AREAS AT THE
CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS,
ATERIALS APPROVED BY THE INSPECTOR, AND
STREET OR CHANNEL AT RIGHT ANGLES TO THE
USED AS VELOCITY CHECK DAMS.

) IN ALL UNPAVED GRADED CHANNELS AT.

S BETWEEN CHECK DAMS
100 FEET
50 FEET
25 FEET

BACKFILLED AND COMPACTED, THE SURFACES
SLIGHTLY TO PREVENT CHANNELING OF WATER
EXERCISED TO PROVIDE FOR CROSS FLOW AT
E NOT ON THE CENTERLINE OF A CROWNED STREET.

HERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE
RAIN IS FORECAST, AND SHALL BE MAINTAINED
TO APRIL 15).

THE DEBRIS AND SILT REMOVED AFTER EACH

READY TO BE PLACED IN POSITION WHEN RAIN
D DIRECTS.

MOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN

S HOURS, CALL PAT LARKIN, PLAYA CAPITAL CO.
SS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ER
NTROL NOTES:

EREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT.
RIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL
ED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS
E.

PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT,
STABILIZED THROUGH OTHER CONSTRUCTION MEATHODS

BE PROTECTED WITH SILT FENCE, SANDBAGS OR OTHER
CONSTRUCTION MANAGER.

E CONTROLLED WITH SOIL SEALANT, SANDBAGS AND/OR
NSTRUCTION MANAGER.

-SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL
AGER)

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. CREHAN
No. C48944
Exp. 9-30-02
CIVIL
STATE OF CALIFORNIA

9-6-01

SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP; HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NON COMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.
2. EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.

OWNER

PLAYA CAPITAL COMPANY
12555 W. JEFFERSON BLVD.
LOS ANGELES, CA 90066
(310) 822-0074

PROJECT ADDRESS

MAJOR STOCKPILE- G.P. #98LA78695
300,000 CY STOCKPILE EAST OF MAJOR STOCKPILE
49104-04 ROADWAY GRADING #BC-401456
52092 ROADWAY GRADING #BC-401451

8775 W. CENTINELA AVE.
LOS ANGELES, CA 90066
TEMPORARY PARKING LOT #98LA77131 #98LA77133

12400 W. JEFFERSON BL.
LOS ANGELES, CA 90094

49104-01 STOCKPILE (FORMER) #95LA38748 #95VN86145 #99LA84085

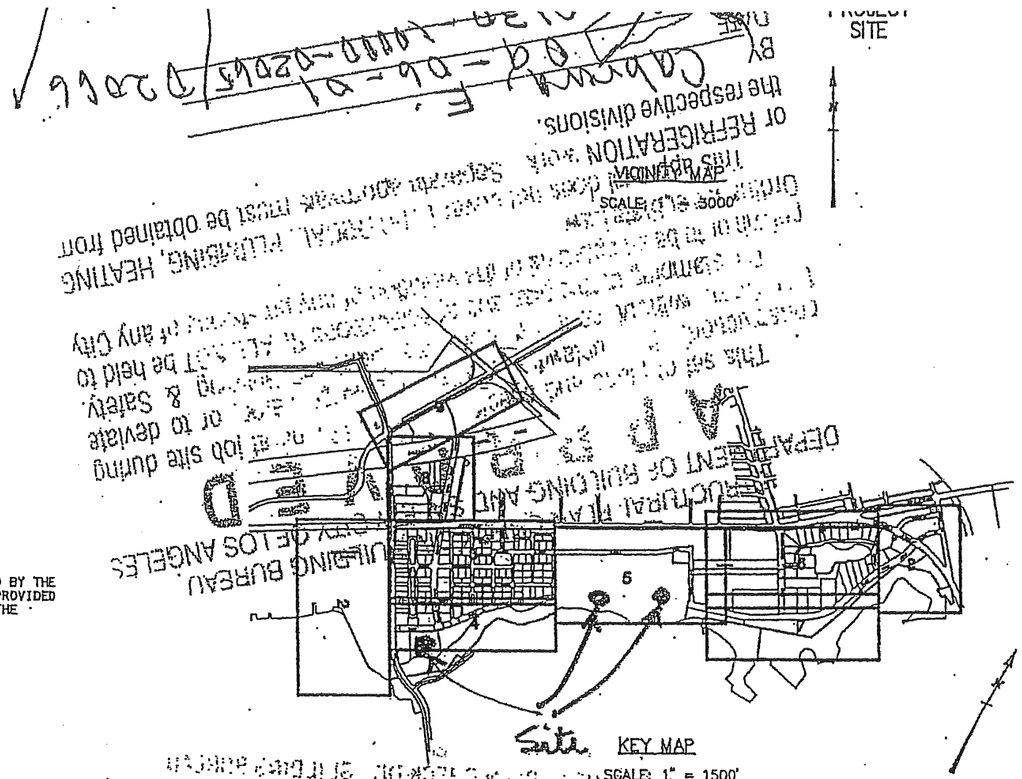
49104-01 ROAD GRADING #95VN86145 BC#401367
49104-01 LOT GRADING #98LA78021
49104-02 STOCKPILE #00LA94539
49104-02 LOT GRADING #00LA95575 #00LA95576

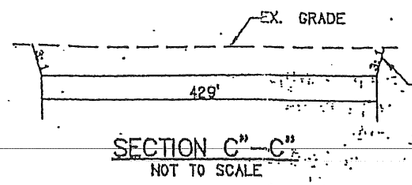
13250 W. JEFFERSON BL.
LOS ANGELES, CA 90094
SURCHARGE W/ OF LINCOLN #98LA77303 #98LA77304

13462 W. JEFFERSON BL.
LOS ANGELES, CA 90094
49104-03 INCREMENT 1 2, & 3 LOT GRADING #99LAB6878 #99LA92049 #00LAB1883

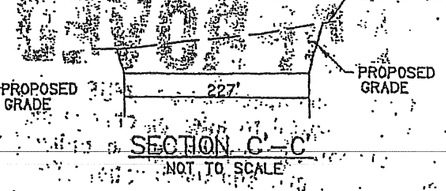
49104-03 ROAD GRADING BC#401424
13255 W. JEFFERSON BLVD
LOS ANGELES CA 90066

49104-05 STOCKPILE #99LAB4085
5390 S. LINCOLN BLVD.
LOS ANGELES CA 90094

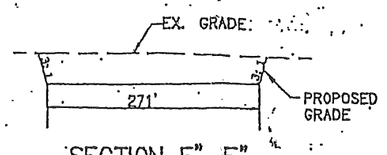




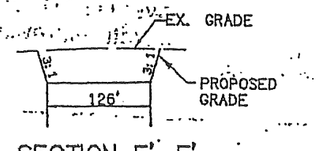
SECTION C"-C"
NOT TO SCALE



SECTION C'-C'
NOT TO SCALE



SECTION E"-E"
NOT TO SCALE



SECTION E'-E'
NOT TO SCALE

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE

Grading For Basins A, C & E

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

PLAYA VISTA AREA D
EROSION CONTROL 2001/2002

SHEET 1 OF 1 SHEETS

MAINTAIN EXISTING SWALE PER SECTION 'C', SHEET 10

MAINTAIN EXISTING SWALE & BERM PER DETAIL. IN AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.

MAINTAIN EXISTING SWALE & BERM PER DETAIL. IN AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

MAINTAIN EXISTING SWALE & BERM PER DETAIL. IN AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

MAINTAIN EXISTING SWALE PER SECTION 'C', SHEET 10

SEE SHEET 13

OPTIONAL SWALE

POTENTIAL FUTURE STOCKPILE/AREA PER MODIFICATION NO. 6543

OPTIONAL BASIN 'B'

OPTIONAL BASIN 'D'

OPTIONAL BASIN 'G'

BASIN 'C'

BASIN 'E'

AREA 'D2'

GRADED SWALE PER DETAIL 3/10, S=0.002 FT/FT

EXISTING BERM GRADED UNDER PERMIT 98A7398

CONSTRUCT SWALE PER DETAIL 3/10

INSTALL SILT FENCE PER DETAIL 1/10

SILT FENCE OPTIONAL

TEMPORARY DETENTION AREA
VOLUME=1.1 AF MAX WS EL=14.7
BOTTOM EL=11.7 TOP OF BERM EL=13.7

PROVIDE SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

INSTALL SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOP OF SLOPE AS REQUIRED BY INSPECTOR 1/10

INSTALL SPILLWAYS DOWN FROM LOW SPOTS PER CONTRACTOR

EXIST. 36" HDPE PIPE

18" - 2' RCP

24" RCP

PUMP DETENTION BASIN AFTER STORMS

SEE SHEET 1 FOR SECTION

TEMPORARY DETENTION AREA
VOLUME=2.73 AF MAX WS EL=9.7
BOTTOM EL=6.2 TOP OF BERM EL=N/A
BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT

MAINTAIN EXISTING SILT FENCE PER DETAIL 1/10

TEMPORARY DETENTION AREA
VOLUME=5.1 AF MAX WS EL=8.6
BOTTOM EL=5.6 TOP OF BERM EL=8.8
BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT

INSTALL TEMPORARY 10' WIDE BY 10' LONG EROSION GRAVEL BLANKET FOR OVERFLOW

TOP/BERM

GRADED SWALE PER DETAIL 3/10

EX. STORM DRAIN

CONSTRUCT SWALE PER DETAIL 3/10

TEMPORARY DETENTION AREA
VOLUME=0.1 AF MAX WS EL=10
BOTTOM EL=8.6 TOP OF BERM EL=N/A

PROVIDE SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

EXIST. 36" HDPE PIPE

INSTALL SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOP OF SLOPE AS REQUIRED BY INSPECTOR 1/10

CONSTRUCT SWALE PER DETAIL 3/10

SEE SHEET 1 FOR SECTION

PUMP DETENTION BASIN AFTER STORMS

MAINTAIN EXISTING SILT FENCE PER DETAIL 1/10

SILT FENCE OPTIONAL

PROPOSED CONSTRUCTION TRAILER AREA

CONSTRUCT SWALE PER DETAIL 3/10

RISER ORIFICE PLATE

24" RCP

PROVIDE SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

TEMPORARY DETENTION AREA
VOLUME=1.7 AF MAX WS EL=16.6
BOTTOM EL=15.6 TOP OF BERM EL=16.6

PROVIDE HOSE BIBB/KICKER TO SEAL PIPE. MAKE CONNECTION TO 36" OVERFLOW DRAIN. SEAL OPENING WITH GROUT. PUMP STORM DRAIN AFTER STORM

INSTALL 36" HDPE

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5/10

SEE NOTE 'A' BELOW TYPICAL FOR ON-SITE CATCH BASINS

EXTEND 48" HDPE BY 40'

TEMPORARY DETENTION AREA
VOLUME=1.67 AF MAX WS EL=12.1
BOTTOM EL=10.4 TOP OF BERM EL=12.1

MAINTAIN SILT FENCE PER DETAIL 1/10

CONSTRUCT SWALE PER DETAIL 3/10

TEMPORARY DETENTION AREA
VOLUME=0.1 AF MAX WS EL=10
BOTTOM EL=8.6 TOP OF BERM EL=N/A

MAINTAIN EX. AREA DRAIN

REMOVE EXISTING STORM DRAIN PIPE TO REMAIN

EXISTING 54" HDPE STORM DRAIN PIPE TO REMAIN

SEE SHEET 11

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL SHEET 10
- SANDBAGS
- DETENTION BASIN

NOTE:
EXACT DETENTION BASIN SHAPE AND LOCATION TO BE DETERMINED BY FIELD CONDITIONS. SWALES FOR DRAINAGE TO BE LOCATED PER FIELD CONDITIONS TO REDUCE/ELIMINATE PONDING EXCEPT IN DESIGNATED TEMPORARY DETENTION AREAS. BASINS TO BE INITALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT.

SLOPE STABILIZATIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

REGISTERED PROFESSIONAL ENGINEER
MICHAEL J. GRESHAM
No. C48944
Exp. 7-30-04
CIVIL
STATE OF CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
MICHAEL DAVIS
No. 2550
Exp. 8-31-02
GEOTECHNICAL
STATE OF CALIFORNIA

Basin 'E'
Site

Basin 'F'
Site

SEC. 22

100 50 0 100 200

Note: For reduced size prints, original scale is in inches.

DATE OF AERIAL PHOTOGRAPHY:
MARCH 2001

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

PLAYA VISTA
EROSION CONTROL 2001/2002
TRACT 49104-04 & 52002

PROJECT NO. 1PCC020454

SHT 3 OF 3

FRESHWATER MARSH

SEE SHEET 2

SEE SHEET 3

TRACT 49104

TRACT 49104-05

LINCOLN BOULEVARD

BAY PARK DRIVE

BAY PARK VISTA DRIVE

SEABLUFF DRIVE

BLUFF CREEK

BASIN "A"

TEMPORARY DETENTION AREA
VOLUME=16.9 AF MAX WS EL=8.5
BOTTOM EL=4.05 TOP OF BERM EL=7.5

MAINTAIN EXISTING SWALE

MAINTAIN STABILIZED CONSTRUCTION ENTRY UNTIL SEAWALK GRADING STARTS

INSTALL EXISTING SILT FENCE PER DETAIL

LOT GRADING PERMIT 01A09415
BD PERMIT 401867 22

LOT GRADING PERMIT
BD PERMIT 401458

MAINTAIN EXISTING SILT FENCE PER DETAIL

PUMP CENTINELA DITCH AFTER STORM

MAINTAIN STABILIZED CONSTRUCTION ENTRY UNTIL GRADING OR STOCKPILING OCCURS

CONSTRUCT SANDBAG BARRIER PER DETAIL

INSTALL STABILIZED CONSTRUCTION ENTRY

GRADE AREA FLAT FOR ACCESS

20' WIDE CHANNEL @ 0.1%

NOTE:
CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY

GRADE TO DRAIN

60 LF 18" RCP

2160 LF 18" PVC

GRADE DRT ACCESS ROAD AS NEEDED

EX. 8'W X 4'9"H RC BOX

16" CLEAR

2-45° COLLAR PER STD DWG NO S-333-0

SEE DETAIL 1 BELOW

SEE DETAIL 2 BELOW

40 LF 6" PVC @ 0.1

GUNNITE TO ELEV. 9.5

SWALE

637'

478'

100'

4.05 FG

4.35 FG

5.10 FG

5.20 FG

EX. GRADE

3:1

240'

PROPOSED GRADE

SECTION A'-A'
NOT TO SCALE

EX. GRADE

3:1

665'

PROPOSED GRADE

SECTION A"-A"
NOT TO SCALE

TRANSITION STRUCTURE PER APWA STD. 342-1

INSTALL 60" DIA CMP STORM DRAIN PIPE

45° CMP ELBOW

MEET EX. HEADWALL OF EX. BOX CULVERT AND GROUT THE JOIN TO ELIMINATE LEAKING

CONCRETE COLLAR PER APWA STD. 380-2

INSTALL BROOKS PRODUCTS AREA DRAIN CB-12"X18" PER SECTION B-B.

PLACE SANDBAGS 1 HIGH IF IN SWALE AND STACK 2 HIGH OTHERWISE

INSTALL 60" DIA HDPE STORM DRAIN PIPE

DETAIL 1
SCALE: 1"=10'

EXISTING HEADWALL AND PROPERTY LINE

SILT FENCE

12"X18" AREA DRAIN RIM OF GRATE=7.00

ROW OF SANDBAGS 2 HIGH @ AREA DRAIN

EXIST. GRADE

GRADED SWALE

1:1 SURCHARGE (TYP)

1:1 SURCHARGE @ AREA DRAIN

6" PVC FROM AREA DRAIN TO TRANSITION STRUCTURE INVERT = 5.80'

2.25'

EXIST. 6'-0"(W) x 4'-6"(H) R.C. BOX BEYOND

5' TRANSITION STR BEYOND

1.22 FL

60"ø CMP BEYOND

SECTION B-B
NOT TO SCALE

TOP OF BERM

7.5

4.45 FG

4.35 FG

PVC

6" GUNNITE AREA TO ELEV. 9.5

DETAIL 2
SCALE: 1"=40'

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL 6 SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE

DATE OF AERIAL PHOTOGRAPHY:
MARCH 2001

SLOPE OPTIONS

100' 50' 0' 100' 200'

Note: For reduced size prints, original scale is in inches.

REGISTERED PROFESSIONAL ENGINEER
MICHAEL DAVID READ
No. GE 2360
Exp. 3-31-02
GEOTECHNICAL
STATE OF CALIFORNIA
9-5-01

REGISTERED PROFESSIONAL ENGINEER
MICHAEL C. CRELAN
No. C48944
Exp. 7-30-04
CIVIL
STATE OF CALIFORNIA
9-6-01

APPROVED
DEPARTMENT OF BUILDING AND SAFETY-CITY OF LOS ANGELES
STRUCTURAL PLAN CHECK DIV./BUILDING BUREAU

This set of plans and specifications MUST be at job site during construction. It is unlawful to alter or change same or to deviate therefrom, without approval from the Dept. of Building & Safety. ALL NOT be held to any violation of any City ordinance.

PSOMAS
13444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

PLAYA VISTA
EROSION CONTROL 2001/2002

PROJECT NO.
1PCC020454

12670 Jefferson Blvd

mit #: **01030 - 10001 - 02066**
Plan Check #: Printed: 08/13/02 08:10 AM
Event Code:

Grading
mmercial
an Check at Counter
No Submit Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 07/24/2002

1. TRACT	BLOCK	LOT(s)	ARB	MAP REF #	PARCEL ID # (PIN)	2. BOOK/PAGE/PARCEL
RANCHO LA BALLONA		RAMONA S DE MACHADO	341.8509441	D C C 2722 C F 64 MAP 58099B157	487	4211 - 013 - 035

3. PARCEL INFORMATION
BAS Branch Office - WLA
Council District - 6
Census Tract - 2753.120
Energy Zone - 6
Lot Size - IRR

Lot Type - Interior
Thomas Brothers Map Grid - 672

ZONE(S): C2, PV /

LA Department of Building and Safety
LA 06 26 016562 08/13/02 08:43AM

ONE STOP SURCH	$164.0
SYSTEMS DEVT FEE	$492.0
CITY PLANNING SURCH	$246.0
MISCELLANEOUS	$5.0
Total Due:	$907.0
Check:	$907.0

4. DOCUMENTS

5. CHECKLIST ITEMS
Storm Water - State SWPPP

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION
Owner(s):
Playa Vista Land Partnership L P 13250 Jefferson Blvd LOS ANGELES CA 90094

Tenant:
Applicant: (Relationship: Owner-Bldr)
- Owner-Builder

7.EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK
expand existing temporary erosion control basin C , construct maintenance road and dirt swales. 125000 cy cut 4500 cy fill. SEE APPROVAL LETTER LOG 37190 . this permit will expire 9/7/03. NO EXCAVATION CAN EXTEND BELOW THE WATER TABLE. excavation goes from elevation 19' to elevation 7'.

9. # Bldgs on Site & Use:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213)-977-6941. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION
BLDG. PC By: Eric Cabrera DAS PC By:
OK for Cashier: Eric Cabrera Coord. OK:
Signature: Date:

For Cashier's Use Only W/0 #: **13002066**
Project Name: PLAYA VISTA

LA Department of Building and Safety
LA 06 26 016562 08/13/02 08:40AM

GRADING PERMIT	$7,975.0
GRADING PLAN CHECK	$225.0
Total Due:	$8,200.0
No Fee:	$8,200.0

NO FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 12670 JEFFERSON BLVD
Auth: PLAYA VISTA
Dept: PLAYA VISTA

02LA 31883

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period
Permit Valuation: 125,000 cu yd PC Valuation:

FINAL TOTAL Grading	9,107.00
Permit Fee Subtotal Grading	7,975.00
Additional Plan Check	225.00
O.S. Surcharge	164.00
Sys. Surcharge	492.00
Planning Surcharge	246.00
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS
Plot Plan

PV 1416
EROSION CONTROL 2002 / 2003
1 OF 10

STORM WATER POLLUTION EROSION CONTROL PLAN NOTES:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN ON THE GRADING PLAN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED OR MODIFIED AS AND WHEN THE INSPECTOR SO DIRECTS AS THE WORK PROGRESSES.

2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED BY THE INSPECTOR.

3. WHEN THE INSPECTOR SO DIRECTS, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.

4. A.) VELOCITY CHECK DAMS SHALL BE PROVIDED ACROSS THE OUTLETS OF ALL LOTS DRAINING INTO THE STREET.
B.) ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGE OF THE FILL.

5. STANDBY CREWS SHALL BE ALERTED BY THE PERMITEE OR CONTRACTOR FOR EMERGENCY WORK DURING RAINSTORMS.

6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING DOWNWARD, TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT SHALL NOT EXCEED THE FOLLOWING:

GRADE OF THE STREET	INTERVAL
LESS THAN 2%	AS REQUIRED
2% TO 4%	100 FEET
4% TO 10%	50 FEET
OVER 10%	25 FEET

7. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED STREET AREAS AT THE INTERVALS INDICATED ABOVE. VELOCITY CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS, TIMBER, OR OTHER EROSION-RESISTANT MATERIALS APPROVED BY THE INSPECTOR, AND SHALL EXTEND COMPLETELY ACROSS THE STREET OR CHANNEL AT RIGHT ANGLES TO THE CENTERLINE. EARTH DIKES MAY NOT BE USED AS VELOCITY CHECK DAMS.

8. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED GRADED CHANNELS AT THE INTERVALS INDICATED BELOW.

GRADE OF CHANNEL	INTERVALS BETWEEN CHECK DAMS
LESS THAN 3%	100 FEET
3% TO 6%	50 FEET
OVER 6%	25 FEET

9. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE MOUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHERE TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.

10. EXCEPT WHEN THE INSPECTOR DIRECTS OTHERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN RAIN IS FORECAST, AND SHALL BE MAINTAINED DURING THE RAINY SEASON (OCTOBER 1 TO APRIL 15).

11. ALL BASINS AND CHECK DAMS SHALL HAVE THE DEBRIS AND SILT REMOVED AFTER EACH STORM TO RESTORE THEIR CAPACITY.

12. SANDBAGS SHALL BE STOCKPILED ON-SITE, READY TO BE PLACED IN POSITION WHEN RAIN IS FORECAST, OR WHEN THE INSPECTOR SO DIRECTS.

13. BRUSH AND GROUND COVER MAY NOT BE REMOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN NOVEMBER 1 AND APRIL 15.

14. IN CASE OF EMERGENCY, DURING BUSINESS-HOURS, CALL PAT LARKIN, PLAYA CAPITAL CO. AT (310) 822-0074. DURING NON BUSINESS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ADDITIONAL STORM WATER POLLUTION EROSION CONTROL NOTES:

1. THE EROSION CONTROL MEASURES SHOWN HEREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT, BASED UPON CITY OF LOS ANGELES CRITERIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL OR MORE STRIGENT MEASURES ARE REQUIRED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS AVAILABLE FOR REVIEW IN THE CONSTRUCTION TRAILER.

2. ALL CUT AND FILL SLOPES ADJACENT TO PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT, UNLESS PLANTED, HYDROSEEDED, AND/OR STABILIZED THROUGH OTHER CONSTRUCTION MEATHODS APPROVED BY THE CONSTRUCTION MANAGER.

3. TOE OF ALL CONTRUCTION SLOPES SHALL BE PROTECTED WITH SILT FENCE, SANDBAGS OR OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

4. EROSION FROM BARE SOIL AREAS SHALL BE CONTROLLED WITH SOIL SEALANT, SANDBAGS AND/OR OTHER MEASURES AS APPROVED BY THE CONSTRUCTION MANAGER.

5. THE SOIL SEALANT MUST BE OF THE TYPE SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL (AS APPROVED BY THE CONSTRUCTION MANAGER).

COMPLIANCE WITH THE GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES:

1. OWNER HAS FILED, WITH THE STATE WATER RESOURCES CONTROL BOARD, A NOTICE OF INTENT (NOI) TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES (GENERAL PERMIT). IN ACCORDANCE WITH THE REQUIREMENTS OF THE GENERAL PERMIT, OWNER HAS PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) FOR THE PROJECT.

2. OWNER RECOGNIZES THAT THE PHYSICAL CHARACTERISTICS OF THE PROJECT SITE, THE PLANNED SITE IMPROVEMENTS, AND THE MEANS, METHODS, AND SEQUENCE OF WORK SELECTED BY THE CONTRACTOR MAY AFFECT THE QUALITY OF STORM WATER DISCHARGES FROM THE SITE, BOTH DURING AND AFTER CONSTRUCTION ACTIVITY. ACCORDINGLY, THE SWPPP FOR THE PROJECT REQUIRES IMPLEMENTATION OF POLLUTANT CONTROL PRACTICES AT THREE LEVELS: 1) SPECIFIC MANDATORY PRACTICES THAT MUST BE IMPLEMENTED AS SPECIFIED; 2) ALTERNATIVE MANDATORY PRACTICES WHERE THE CONTRACTOR SELECTS FROM LISTED PRACTICES THE ALTERNATIVE THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK; AND 3) PRACTICES WHERE THE CONTRACTOR SELECTS THE CONTROL PRACTICES THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP; HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NON COMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.
2. EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.
3. PONDING WATER IS NOT ALLOWED.

OWNER

PLAYA CAPITAL COMPANY
12555 W. JEFFERSON BLVD.
LOS ANGELES, CA 90066
(310) 822-0074

PROJECT ADDRESS

MAJOR STOCKPILE- G.P. #98LA78395

300,000 CY STOCKPILE EAST OF MAJOR STOCKPILE
49104-04 ROADWAY GRADING #BC-401456
52092 ROADWAY GRADING #BC-401451

6775 W. CENTINELA AVE.
LOS ANGELES, CA 90066
TEMPORARY PARKING LOT #98LA77131
#98LA77133

12400 W. JEFFERSON BL.
LOS ANGELES, CA 90094

49104-01 STOCKPILE (FORMER) #95LA38748
#95VN96145
#99LA84085

49104-01 ROAD GRADING #95VN96145
BC#401367

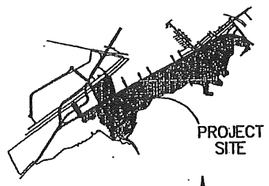
49104-01 LOT GRADING #98LA76021
49104-02 STOCKPILE #00LA94530
49104-02 LOT GRADING #00LA95575
#00LA95576

13250 W. JEFFERSON BL.
LOS ANGELES, CA 90094
SURCHARGE W/ OF LINCOLN #98LA77303
#98LA77304

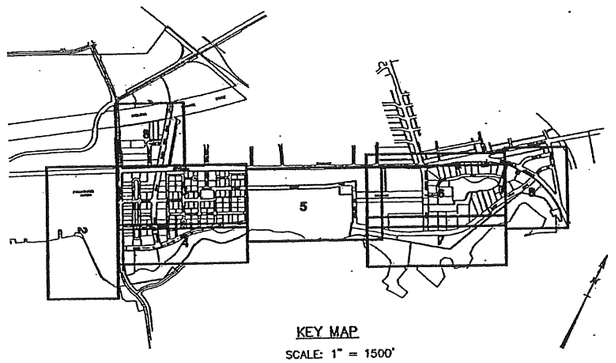
13462 W. JEFFERSON BL.
LOS ANGELES, CA 90094
49104-03 INCREMENT 1 2, & 3 LOT GRADING #99LAB6678
#99LA92049
#00LA91983

49104-03 ROAD GRADING BC#401424
13255 W. JEFFERSON BLVD
LOS ANGELES CA 90066

49104-05 STOCKPILE #99LA84085
5390 S. LINCOLN BLVD.
LOS ANGELES CA 90094



VICINITY MAP
SCALE: 1" = 3000'



KEY MAP
SCALE: 1" = 1500'

APPROVED FOR EROSION CONTROL
FROM OCTOBER 15, 2002 TO APRIL 15, 2003
ORIGINAL SIGNED BY [illegible] DATE 10-4-02
DISTRICT ENGINEER-WLA

DIV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. 48944 Exp. 6-30-04 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)
MICHAEL J. CREHAN RCE 48944 6-30-02 DATE

PLAYA VISTA AREA D EROSION CONTROL 2002/2003
TITLE SHEET

PROJECT NO. 1PCC020545
SHEET 1 OF 10
DV 1001-04

Plotted: 09/24/02 10:32:21 P:\PVA\PVA1001\DWG\PVA1001-04.DWG

PV 1416
EROSION CONTROL 2002 / 2003
5 OF 10

MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9

GRADED SWALE PER DETAIL 3, 10, S=0.002 FT/FT

OPTIONAL BASIN "D"

SILT FENCE OPTIONAL

TEMPORARY DETENTION AREA
VOLUME=1.1 AF MAX WS EL=14.7
BOTTOM EL=11.7 TOP OF BERM EL=15.2

MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

TEMP. ASPHALT CURB

EXIST. 48" CMP

HALF 48" CAP

INSTALL 18" PIPE WITH PERFORATED RISER INTAKE INV. 6.5

11.80 FG

11.80 FG

18" - 2" EVC

RISER

11.70 FG

13'±

24" RCP

EXISTING BERM GRADED UNDER PERMIT 98LA77388

MAINTAIN SWALE PER DETAIL 3, 10

MAINTAIN SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOP OF SLOPE AS REQUIRED BY INSPECTOR. 1, 10

MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

MAINTAIN SWALLWAYS DOWN FROM LOW SPOTS PER CONTRACTOR

(11.5) INV.

EXIST. 36" HDPE PIPE

EXIST. 36" HDPE PIPE

11.4 INV

11.25 INV

RUNWAY

MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

11.5 INV

14.00 INV

MAINTAIN SWALE PER DETAIL 3, 10

SILT FENCE BETWEEN RISER & ORIFICE 25'±

13.60 FG

13.9 FL

24" RCP

13.70 FG

OPTIONAL BASIN "H"

18.8 FG

13.60 FG

13.9 FL

60'±

TEMPORARY DETENTION AREA
VOLUME=1.7 AF MAX WS EL=16.8
BOTTOM EL=13.6 TOP OF BERM EL=16.8

MAINTAIN CMU BLOCK BULKHEAD TO SEAL PIPE. MAKE CORNECTION TO 36" OVERFLOW DRAIN. SEAL OPENING WITH GROUT.

PUMP STORM DRAIN AFTER STORM, IF REQUIRED

MAINTAIN 36" HDPE

10.08 FL

MILLENNIUM

USE BLOCK & GRAVEL BAG AROUND CATCH BASIN(S) PER DETAIL 5, 10

SEE NOTE "A" BELOW, TYPICAL FOR ON-SITE CATCH BASINS

INSTALL 18" PIPE WITH PERFORATED RISER INTAKE INV. 6.5

(11.2) INV

11.90 FG

BERM 1'

SLOPE RAMP UP TO EXISTING GRADE 7% MAX

GRADE AND EXPAND EXISTING BASIN "C"

AREA D2

MAINTENANCE ACCESS RD. 20' MIN. WIDTH

MAINTENANCE ACCESS RD.

9.30 TOP/BERM

9.15 FL

BASIN "E"

MAINTAIN SWALE PER DETAIL 3, 10

10.00 FG

10.25 FG

SILT FENCE OPTIONAL

MAINTAIN EXISTING SILT FENCE PER DETAIL 1, 10

7.00 FG

PUMP DETENTION BASINS AFTER STORMS

TEMPORARY DETENTION AREA
VOLUME=2.73 AF MAX WS EL=9.7
BOTTOM EL=6.2 TOP OF BERM EL=N/A
BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT

CONSTRUCT SWALE PER DETAIL 3, 10

SILT FENCE OPTIONAL

OPTIONAL BASIN "G"

10.50 FG

10.60 FG

12.10 FL

10.50 FG

EXISTING BASIN "C"

PROJECT WELLS IN PLACE (TYP.)

TEMPORARY DETENTION AREA
VOLUME=36.2 AF, MAX WS EL=8.5
BOTTOM EL=6.5, TOP OF BERM EL=9.5
BASIN TO BE DEWATERED BY GRAVITY

CONSTRUCTION TRAILER AREA

BLDG. 45

MAINTAIN SILT FENCE PER DETAIL 1, 10

7.00 FL/INV

POST-STORM DRAIN TO BE LEFT IN PLACE & DRAINAGE MAINTAINED

CONSTRUCT SWALE PER DETAIL 3, 10 TO REVERSE FLOW OF DITCH

6.50 FL

9.50 FL

ANY ADJOINING AREAS TO PROPOSED DRAINAGE SWALES SHALL BE FILLED TO MATCH AT 2% MIN. SLOPE

END OF SECTION C-E WITH 20' TRANSITION OF SLOPE 2:1 TO EXIST. GRADE INSTALL PLASTIC AND SANDBAGS TO PREVENT EROSION ALONG TRANSITION

MAINTAIN EX. AREA DRAIN (TYP.) (TC=12.3) (FL=7.8 OUT) (FL=7.9 IN)

MAINTAIN EX. AREA DRAIN (TC=15.5) (FL=8.4 OUT) (FL=8.9 IN)

TWO EXISTING 18" HDPE STORM DRAIN PIPES TO REMAIN

USE BLOCK & GRAVEL BAG AROUND CATCH BASINS PER DETAIL 5, 10 SEE NOTE "A" BELOW, TYPICAL FOR ON-SITE CATCH BASINS

BLDG. 21

TEMPORARY DETENTION AREA
VOLUME=1.67 AF MAX WS EL=12.1
BOTTOM EL=10.4 TOP OF BERM EL=12.1

12" EXISTING 54" HDPE STORM DRAIN PIPE TO REMAIN

WESTLAWN

SEE SHEET 4

SEE SHEET 6

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE OR DEVICE PER PLAN
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10 (1/10)
- SECTION PER DETAIL 6 SHEET 10 (6/10)
- SANDBAGS
- DETENTION BASIN
- SWALE
- DRW — WELL LOCATION AND NUMBER

NOTE:
EXACT DETENTION BASIN SHAPE AND LOCATION TO BE DETERMINED BY FIELD CONDITIONS. SWALES FOR DRAINAGE TO BE LOCATED PER FIELD CONDITIONS TO REDUCE/ELIMINATE PONDING EXCEPT IN DESIGNATED TEMPORARY DETENTION AREAS. BASINS TO BE INITIALLY DEWATERED BY GRAVITY, AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT.

SLOPE OPTIONS
- HYDROSEED WITH TACK
- HYDROSEED WITH STRAW BONDED FIBER MATRIX SOIL SEALANT

100' 50' 0' 100' 200'

Note: For reduced size prints, original scale is in inches.

DATE OF AERIAL PHOTOGRAPHY: APRIL 2001

REV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER — MICHAEL J. CREHAN — No. R48944 — Exp. 9-30-04 — CIVIL — STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

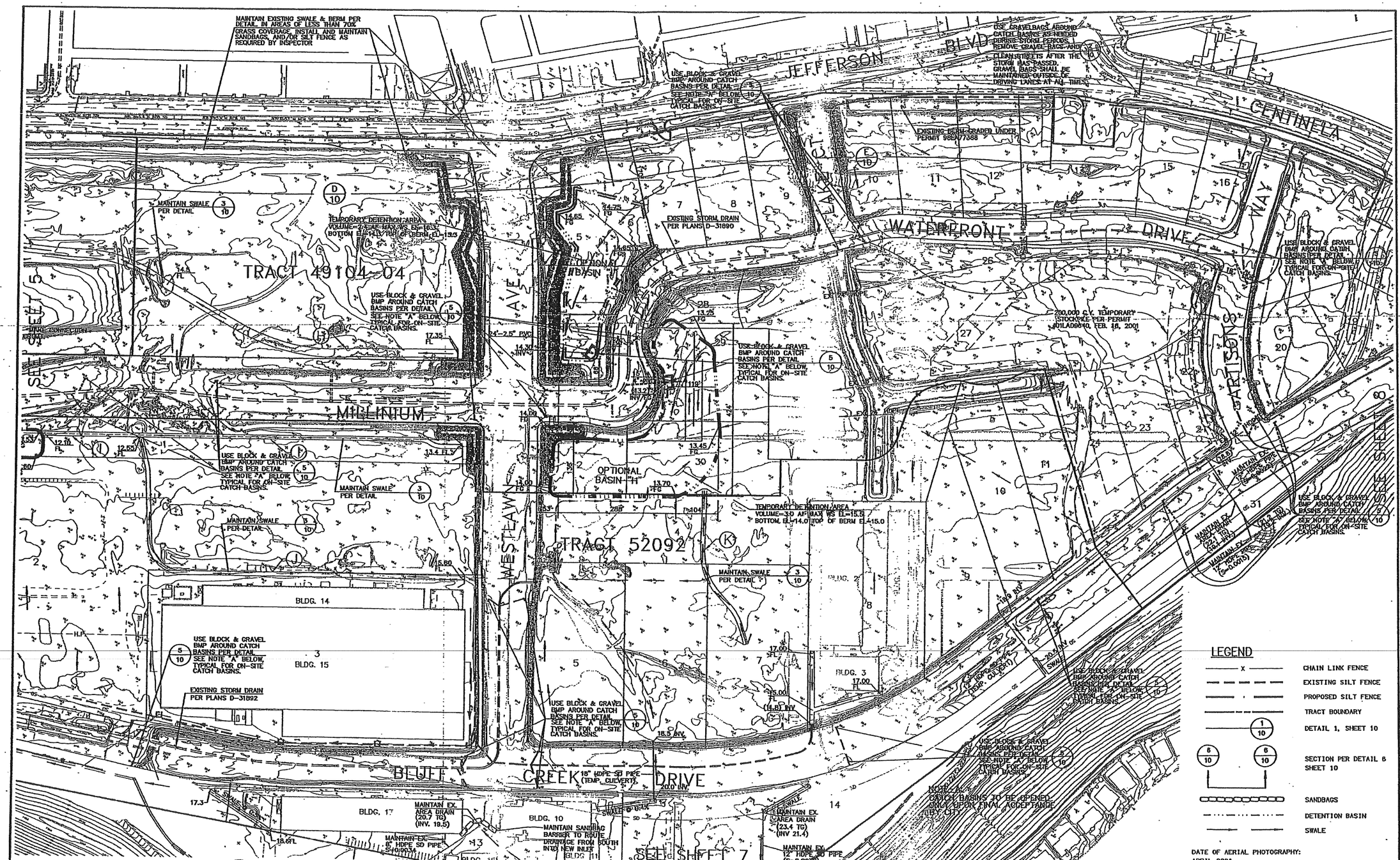
9-30-02
MICHAEL J. CREHAN RCE 48944 — DATE

PLAYA VISTA
EROSION CONTROL 2002/2003
TRACT 49104-04 & 52092

PROJECT NO. 1PCC020545
SHEET 5 OF 10

PV 1416

PV 1416
EROSION CONTROL 2002 / 2003
6 OF 10



REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CROHAN No. 48944 Exp. 6-30-04 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. CROHAN RCE 48944 — 9-30-02 DATE

PLAYA VISTA
EROSION CONTROL 2002/2003
TRACT 49104-04 & 52092

PROJECT NO. 1PCC020545
SHEET 6
OF 10

PV 1416

12707 W Teale St

Permit #: 03030 - 10000 - 02535
Plan Check #: B03LA2033 Printed: 09/16/03 11:26 AM
Event Code:

Grading
Commercial
Regular Plan Check
Plan Check Submittal

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 09/16/2003

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306441	D C C 2722	C F 64	102B161 12	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306	D C C 2722	C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306450	D C C 2722	C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306441	D C C 2722	C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevation
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.010
Census Tract - 2765.000
District Map - 102B161
Environmentally Sensitive Area - YES
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES
Near Source Zone Distance - 8.0
Thomas Brothers Map Grid - 702-D1

ZONE(S): C2(PV) /

4. DOCUMENTS

ZI - ZI-1320
ZI - ZI-1874
ZA - ZA-2000-5255-PA
SPA - Los Angeles Coastal Transportatio
SPA - Playa Vista (Area D)
ORD - ORD-160523
ORD - ORD-174995
DTRM - DIR-2003-3257
DTRM - DIR-2000-5369
DTRM - DIR-2003-835-SPP
DTRM - DIR-2003-836-SPP
CPC - CPC-1985-272-PA
CPC - CPC-1991-172-A
CPC - CPC-1999-96-PV
AFF - AF-95-1309268-FS
AFF - AF-95-1309269-PP

5. CHECKLIST ITEMS

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co Llc — 12555 Jefferson Blvd STE 300 — LOS ANGELES CA 90066
Playa Capital Company, Llc — 12555 Jefferson Blvd. 300 — LOS ANGELES, CA 90066 — 3108220074
Tenant:
Applicant: (Relationship: Agent for Owner)
Moe Psomas — 11444 West Olympic Blvd. 750 — WEST LOS ANGELES, CA 90064 — (818) 634-5003

7. EXISTING USE / PROPOSED USE

(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

DRAINAGE PLAN THRUOUT PLAYA VISTA SITE FOR 2003 TO 2004 EROSION CONTROL.

9. # Bldgs on Site & Use: PLAYA VISTA EROSION CONTROL

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: Ricardo Tres
DAS PC By:
OK for Cashier: Ricardo Tres
Coord. OK:
Signature: RTres
Date: 9/16/03

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 33002535

Project: PLAYA VISTA

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period:

Permit Valuation: 10,000 cu yd PC Valuation:

FINAL TOTAL Grading	3,090.25
Permit Fee Subtotal Grading	2,725.00
Plan Check Subtotal Grading	0.00
Plan Maintenance	54.50
O.S. Surcharge	55.59
Sys. Surcharge	166.77
Planning Surcharge	83.39
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Permit # 03LA48010

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS

11/14/03 08:48 FAX 310 954 3777 PSOMAS → VALENCIA 008

CAD FILE COPY IRVINE, CA

PV 1485 1/10 EROSION CONTROL AREA D

2003-2004

STORM WATER POLLUTION EROSION CONTROL PLAN NOTES:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN ON THE GRADING PLAN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED OR MODIFIED AS AND WHEN THE INSPECTOR SO DIRECTS AS THE WORK PROGRESSES.

2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED BY THE INSPECTOR.

3. WHEN THE INSPECTOR SO DIRECTS, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.

4. A.) VELOCITY CHECK DAMS SHALL BE PROVIDED ACROSS THE OUTLETS OF ALL LOTS DRAINING INTO THE STREET.
   B.) ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGE OF THE FILL.

5. STANDBY CREWS SHALL BE ALERTED BY THE PERMITEE OR CONTRACTOR FOR EMERGENCY WORK DURING RAINSTORMS.

6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING DOWNWARD, TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT SHALL NOT EXCEED THE FOLLOWING:

GRADE OF THE STREET	INTERVAL AS REQUIRED
LESS THAN 2%	100 FEET
2% TO 4%	50 FEET
4% TO 10%	25 FEET
OVER 10%	

7. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED STREET AREAS AT THE INTERVALS INDICATED ABOVE. VELOCITY CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS, TIMBER, OR OTHER EROSION-RESISTANT MATERIALS APPROVED BY THE INSPECTOR, AND SHALL EXTEND COMPLETELY ACROSS THE STREET OR CHANNEL AT RIGHT ANGLES TO THE CENTERLINE. EARTH DIKES MAY NOT BE USED AS VELOCITY CHECK DAMS.

8. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED GRADED CHANNELS AT THE INTERVALS INDICATED BELOW.

GRADE OF CHANNEL	INTERVALS BETWEEN CHECK DAMS
LESS THAN 3%	100 FEET
3% TO 6%	50 FEET
OVER 6%	25 FEET

9. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE MOUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHERE TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.

10. EXCEPT WHEN THE INSPECTOR DIRECTS OTHERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN RAIN IS FORECAST, AND SHALL BE MAINTAINED DURING THE RAINY SEASON (OCTOBER 1 TO APRIL 15).

11. ALL BASINS AND CHECK DAMS SHALL HAVE THE DEBRIS AND SILT REMOVED AFTER EACH STORM TO RESTORE THEIR CAPACITY.

12. SANDBAGS SHALL BE STOCKPILED ON-SITE, READY TO BE PLACED IN POSITION WHEN RAIN IS FORECAST, OR WHEN THE INSPECTOR SO DIRECTS.

13. BRUSH AND GROUND COVER MAY NOT BE REMOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN NOVEMBER 1 AND APRIL 15.

14. IN CASE OF EMERGENCY, DURING BUSINESS HOURS, CALL CLIFF RITZ, PLAYA CAPITAL CO. AT (310) 345-6941. DURING NON-BUSINESS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ADDITIONAL STORM WATER POLLUTION EROSION CONTROL NOTES:

1. THE EROSION CONTROL MEASURES SHOWN HEREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT, BASED UPON CITY OF LOS ANGELES CRITERIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL OR MORE STRIGENT MEASURES ARE REQUIRED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS AVAILABLE FOR REVIEW IN THE CONSTRUCTION TRAILER.

2. ALL CUT AND FILL SLOPES ADJACENT TO PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT, UNLESS PLANTED, HYDROSEEDED, AND/OR STABILIZED THROUGH OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

3. TOE OF ALL CONTRUCTION SLOPES SHALL BE PROTECTED WITH SILT FENCE, SANDBAGS OR OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

4. EROSION FROM BARE SOIL AREAS SHALL BE CONTROLLED WITH SOIL SEALANT, SANDBAGS AND/OR OTHER MEASURES AS APPROVED BY THE CONSTRUCTION MANAGER.

5. THE SOIL SEALANT MUST BE OF THE TYPE SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL (AS APPROVED BY THE CONSTRUCTION MANAGER).

COMPLIANCE WITH THE GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES:

1. OWNER HAS FILED WITH THE STATE WATER RESOURCES CONTROL BOARD A NOTICE OF INTENT (NOI) TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES (GENERAL PERMIT). IN ACCORDANCE WITH THE REQUIREMENTS OF THE GENERAL PERMIT, OWNER HAS PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) FOR THE PROJECT.

2. OWNER RECOGNIZES THAT THE PHYSICAL CHARACTERISTICS OF THE PROJECT SITE, THE PLANNED SITE IMPROVEMENTS, AND THE MEANS, METHODS, AND SEQUENCE OF WORK SELECTED BY THE CONTRACTOR MAY AFFECT THE QUALITY OF STORM WATER DISCHARGES FROM THE SITE, BOTH DURING AND AFTER CONSTRUCTION ACTIVITY. ACCORDINGLY, THE SWPPP FOR THE PROJECT REQUIRES IMPLEMENTATION OF POLLUTANT CONTROL PRACTICES AT THREE LEVELS: 1) SPECIFIC MANDATORY PRACTICES THAT MUST BE IMPLEMENTED AS SPECIFIED; 2) ALTERNATIVE MANDATORY PRACTICES WHERE THE CONTRACTOR SELECTS FROM LISTED PRACTICES THE ALTERNATIVE THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK; AND 3) PRACTICES WHERE THE CONTRACTOR SELECTS THE CONTROL PRACTICES THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP. HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NON-COMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.

2. FOR INDIVIDUAL DEVELOPMENT SITES, EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.

3. PONDING WATER IS NOT ALLOWED.

OWNER

PLAYA CAPITAL COMPANY
12555 W. JEFFERSON BLVD.
LOS ANGELES, CA 90066
(310) 822-0074

PROJECT ADDRESS

MAJOR STOCKPILE- G. P. #98LA78695

300,000 CY STOCKPILE EAST OF MAJOR STOCKPILE- G. P. #98LA77388
49104-04 ROADWAY GRADING #BC-401456
52092 ROADWAY GRADING #BC-401451

6775 W. CENTINELA AVE.
LOS ANGELES, CA 90066

500,000 CY STOCKPILE- G. P. #03LA42389

125,000 CY STOCKPILE- G. P. #03LA42400

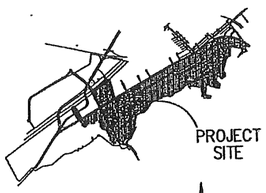
12555 JEFFERSON BLVD. 300
LOS ANGELES, CA 90066

DETENTION BASINS- G. P. #01LA17739
G. P. #02LA31883

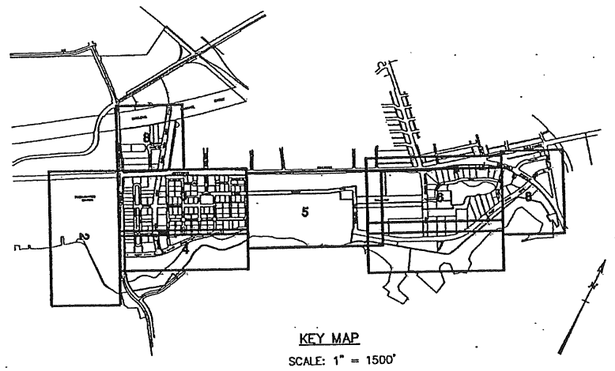
12670 JEFFERSON BLVD.
LOS ANGELES, CA 90094

DETENTION BASIN- G. P. #01LA17737

12680 JEFFERSON BLVD.
LOS ANGELES, CA 90094



VICINITY MAP
SCALE: 1" = 3000'



KEY MAP
SCALE: 1" = 1500'

APPROVED FOR EROSION CONTROL
FROM OCTOBER 15, 2003 TO APRIL 15, 2004
for Mike Patena
by Willie Cauz DATE 8-28-03
DISTRICT ENGINEER-WLA

REV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREAGAN No. C48944 Exp 9-30-04 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. CREAGAN RCE 48944 — DATE 8/27/03

PLAYA VISTA AREA D EROSION CONTROL 2003/2004
TITLE SHEET

PROJECT NO. 1PCC0205.93
SHEET 1 OF 10
PV 1485-01

Plotted: 08/29/03 17:52:38 by V:\Projects\0205-01\PLOTFILES\preMLV\PV1485-02.dwg Layout: 11x17

PV 14485
2003-2004 AREA "D" EROSION CONTROL

5/10

EXISTING BASIN C
AREA D2

STOCKPILE AREA

OPTIONAL BASIN

RUNWAY

MILLENNIUM

BLDG. 45

BLDG. 22

CONSTRUCTION TRAILER

SEE SHEET 4

SEE SHEET 6

MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9

MAINTAIN EXISTING SWALE & BERM PER DETAIL 1/N AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.

MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9

GRADE SWALE PER DETAIL

SILT FENCE PER DETAIL

TEMPORARY DETENTION AREA VOLUME=1.17 AF MAX WS EL=13.7 BOTTOM EL=13.1 TOP OF BERM EL=13.7

MAINTAIN SANDBAGS AROUND ALL 3"PE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

TEMP. 84" CMP RISER STR.

94LF 48" CMP

EXIST. 36" CMP

EXIST. 36" HDPE PIPE

MAINTAIN SPILLWAYS DOWN FROM LOW SPOTS PER CONTRACTOR

EXIST. 36" HDPE PIPE

MAINTAIN 12" PIPE WITH PERFORATED RISER INTAKE INV. 6.5

MAINTENANCE ACCESS RD EL. 9.5

ACCESS ROAD EL. 8.5

STOCKPILE AREA

PROTECT WELLS IN PLACE

PUMP DETENTION BASINS AFTER STORMS

MAINTAIN EXISTING SILT FENCE PER DETAIL

GRADE TO DRAIN

TEMPORARY DETENTION AREA VOLUME=58.2 AF, MAX WS EL=11.0 BOTTOM EL=8.5 (AVERAGED) TOP OF BERM EL=9.5± BASIN TO BE DEWATERED BY GRAVITY, PUMP AS NECESSARY

MAINTAIN SILT FENCE PER DETAIL

EXIST. STORM DRAIN TO BE LEFT IN PLACE & DRAINAGE MAINTAINED

MAINTAIN SWALE PER DETAIL TO REVERSE FLOW OF DITCH

END OF SECTION E-E WITH 20' TRANSITION OF SLOPE 2:1 TO EXIST. GRADE INSTALL PLASTIC AND SANDBAGS TO PREVENT EROSION ALONG TRANSITION

ANY AREAS ADJACENT TO PROPOSED DRAINAGE SWALES SHALL BE FILLED TO DAYLIGHT AT 2% MIN. SLOPE.

GRADE TO DRAIN

NOTE-ALL CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY.

EXISTING BERM GRADED UNDER PERMIT/BY OTHERS

GRADE TO DRAIN

MAINTAIN SWALE PER DETAIL

MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

MAINTAIN SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOP OF SLOPE AS REQUIRED BY INSPECTOR

MAINTAIN SANDBAGS OR OTHER EROSION CONTROL MEASURES AT TOE OF SLOPE AS REQUIRED BY INSPECTOR

GRADE SWALE PER DETAIL

CONSTRUCT SWALE PER DETAIL

12" CPVC PIPE

SILT FENCE OPTIONAL

TEMPORARY DETENTION AREA VOLUME=2.75 AF MAX WS EL=9.7 BOTTOM EL=8.2 TOP OF BERM EL=N/A BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT

SILT FENCE OPTIONAL

MAINTAIN SWALE PER DETAIL

RISER ORIFICE 2"x3"

28" RCP

MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)

MAINTAIN EXISTING SWALE & BERM PER DETAIL 1/N AREAS OF LESS THAN 70% GRASS COVERAGE, INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

OPTIONAL BASIN

TEMPORARY DETENTION AREA VOLUME=1.17 AF MAX WS EL=16.6 BOTTOM EL=13.6 TOP OF BERM EL=16.6

MAINTAIN CMU BLOCK BULKHEAD TO SEAL PIPE. MAKE CONNECTION TO 36" OVERFLOW DRAIN. SEAL OPENING WITH GROUT.

SUMP LOCATION

PUMP STORM DRAIN AFTER STORM, IF REQUIRED

MAINTAIN 36" HDPE

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5/10

SEE NOTE "A" BELOW TYPICAL FOR ON-SITE CATCH BASINS

SUMP LOCATION

OPTIONAL BASIN "G"

TEMPORARY DETENTION AREA VOLUME=1.57 AF MAX WS EL=12.1 BOTTOM EL=10.4 TOP OF BERM EL=12.1

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5/10 SEE NOTE "A" BELOW TYPICAL FOR ON-SITE CATCH BASINS

SUMP LOCATION

TWO EXISTING 36" HDPE STORM DRAIN PIPES TO REMAIN

MAINTAIN EX. AREA DRAIN (TC= 12.3) (FL= 7.8 OUT) (FL= 7.9 IN)

MAINTAIN EX. AREA DRAIN (TC= 16.8) (FL= 8.8 OUT) (FL= 8.9 IN)

12 EXISTING 54" HDPE STORM DRAIN PIPE TO REMAIN

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE OR DEVICE PER PLAN
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL 6 SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE
- DRW — WELL LOCATION AND NUMBER

NOTE:
EXACT DETENTION BASIN SHAPE AND LOCATION TO BE DETERMINED BY FIELD CONDITIONS. SWALES FOR DRAINAGE TO BE LOCATED PER FIELD CONDITIONS TO REDUCE/ELIMINATE PONDING EXCEPT IN DESIGNATED TEMPORARY DETENTION AREAS. BASINS TO BE INITALLY DEWATERED BY GRAVITY, AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT.

SLOPE OPTIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

100' 50' 0' 100' 200'

Note: For reduced size prints, original scale is in inches.

DATE OF AERIAL PHOTOGRAPHY: MAY 2003

REV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CHEHAN No. C48944 Exp. 6-30-04 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. CHEHAN RCE 48944 — 6/27/03 DATE

PLAYA VISTA
EROSION CONTROL 2003/2004
AREA D-2, TRACT 49104-04 & 52092

PROJECT NO. 1PCC0205.93

SHEET 5 OF 10

PV 14485-05

Plotted: 06/26/03 11:53:07 K:\PV\MAPS\AD-HOC\DRAWINGS\PV14485-05.dwg

EROSION PLAN

EXH FILE COPY, IRVINE, CA.

PV 14485
2003-2004

10/10

EROSION CONTROL PLAN
TRACT 49104-04 AREA "D"

MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE. INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR

USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL SEE NOTE "A" BELOW. TYPICAL FOR ON-SITE CATCH BASINS.

EXISTING BERM GRADED UNDER PERMIT 98SW7388

JEFFERSON BLVD

CENTINELA

WATERFRONT DRIVE

WAY

ARTISANS

SHORE

EXISTING STORM DRAIN PER PLANS D-31892

GRADE TO DRAIN

TEMPORARY DETENTION AREA VOLUME=2.0 AF/MAX WS EL=16.8 BOTTOM EL=14.5 TOP OF BERM EL=15.3

MAINTAIN SWALE PER DETAIL 3/10

TRACT 49104-04

OPTIONAL BASIN "J"

OPTIONAL BASIN "H"

TRACT 52092

MAINTAIN SWALE

MAINTAIN SWALE PER DETAIL 3/10

MAINT. CONNECTION

SHEET 5

MILLENIUM

CENTER DRIVE

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL SEE NOTE "A" BELOW. TYPICAL FOR ON-SITE CATCH BASINS.

24"-2.5% PVC

SUMP LOCATION

200,000 C.Y. TEMPORARY STOCKPILE PER PERMIT #01LA09810, FEB. 18, 2001

MAINTAIN EX. 12" HDPE SD PIPE (23' LONG) (INV 21.4)

MAINTAIN EX. 12" HDPE SD PIPE (S=0.0075)

MAINTAIN SWALE PER DETAIL 3/10

MAINTAIN SWALE PER DETAIL 5/10

BLDG. 14

BLDG. 15

BLDG. 2

BLDG. 3

BLDG. 17

BLDG. 10

BLDG. 11

H.P.

SUMP LOCATION

EXISTING STORM DRAIN PER PLANS D-31892

USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL SEE NOTE "A" BELOW. TYPICAL FOR ON-SITE CATCH BASINS.

BLUFF CREEK DRIVE

16" HDPE SD PIPE (TEMP. CULVERT)

MAINTAIN EX. AREA DRAIN (20.7 TO) (INV. 19.5)

MAINTAIN EX. 8" HDPE SD PIPE S10/003A

MAINTAIN SANDBAG BARRIER TO ROUTE DRAINAGE FROM SOUTH INTO NEW INLET

MAINTAIN EX. AREA DRAIN (23.4 TO) (INV 21.4)

MAINTAIN EX. 12" HDPE SD PIPE (S=0.0036)

NOTE "A": CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE

SEE SHEET 7

TEMPORARY DETENTION AREA VOLUME=3.0 AF/MAX WS EL=15.5 BOTTOM EL=14.0 TOP OF BERM EL=15.0

LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL 6 SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE

DATE OF AERIAL PHOTOGRAPHY: MAY 2003

SLOPE OPTIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

100' 50' 0' 100' 200'

Note: For reduced size prints, original scale is in inches.

REV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. C48944 Exp. 9-30-04 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. CREHAN RCE 48944 — 8/27/03 DATE

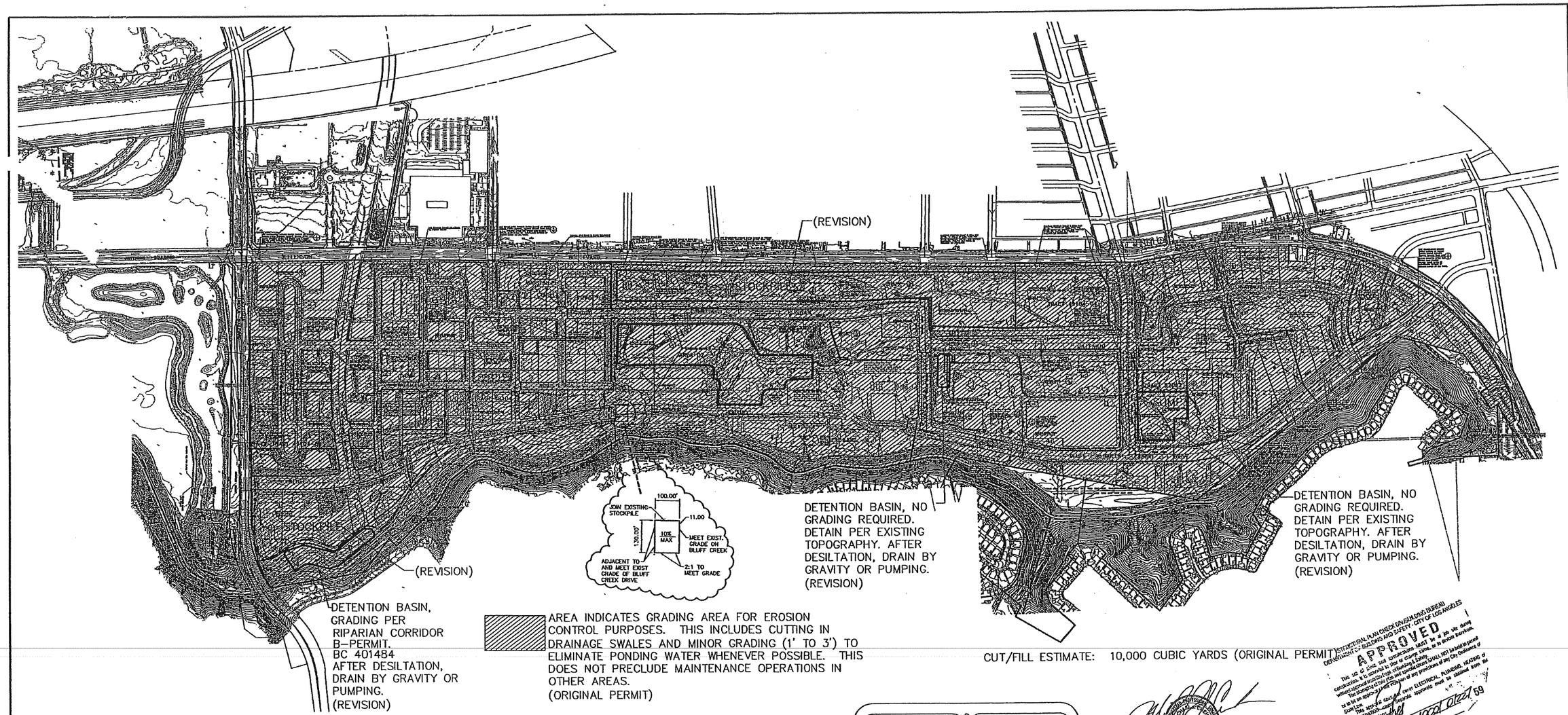
PLAYA VISTA
EROSION CONTROL 2003/2004
TRACT 49104-04 & 52092

PROJECT NO. 1PCC0205.93

SHEET 6 OF 10

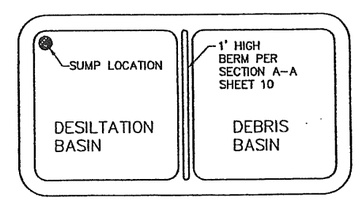
PV 1485-06

1, 5, 6, 11



AREA INDICATES GRADING AREA FOR EROSION CONTROL PURPOSES. THIS INCLUDES CUTTING IN DRAINAGE SWALES AND MINOR GRADING (1' TO 3') TO ELIMINATE PONDING WATER WHENEVER POSSIBLE. THIS DOES NOT PRECLUDE MAINTENANCE OPERATIONS IN OTHER AREAS. (ORIGINAL PERMIT)

CUT/FILL ESTIMATE: 10,000 CUBIC YARDS (ORIGINAL PERMIT)



TYPICAL DETENTION BASIN

NOTE: DEBRIS BASIN MINIMUM SIZE, 50' x 50'

1-14-04

STRUCTURAL PLAN CHECK DIVISION/DIVISION BUREAU
DEPARTMENT OF BUILDING AND SAFETY - CITY OF LOS ANGELES
APPROVED
This set of plans and specifications MUST be at job site during construction. It is unlawful to alter or change same, or to deviate therefrom without approval of the Department of Building & Safety. This approval shall not be held to permit or to be an approval of the violation of any provisions of any City Ordinance or State Law. Approval of Civil, Electrical, Plumbing, Heating or Refrigeration Engineering approvals must be obtained from the respective divisions.
BY
DATE 03/20/2004 10:01 01/27/59
PERMIT NO. 1/27/04

Revised Erosion Control Composite - 03/04

PSOMAS

DATE: 09-08-03 REVISED ON: 11-17-03
JOB No: 1PCC0206.18
SHEET 1 OF 11
PV1485-11

300' 150' 0' 300' 600'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

Playa Capital Company, LLC
Playa Vista Development

1FCC020/12

Area D

12707 W Teale St

Permit #: **04030 - 10000 - 03292**
Plan Check #: B04LA0156 Printed: 10/14/04 08:58 AM
Event Code:

Grading
ommercial
Plan Check at Counter
No Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 10/14/2004

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
RANCHO SAUSAL REDON		LT 38	57	PAT 1-507/508	102B161 64	4211 - 013 - 028
SUBDIVISION OF SECTION		4		M R 36-5	102B161 80	4211 - 013 - 028
RANCHO SAUSAL REDON		LT 38	62	PAT 1-507/508	102B161 36	4211 - 013 - 028
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.0306	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevation
Airport Hazard Area - 200' Height Limit Above Elevation
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.01
District Map - 102B161
Environmentally Sensitive Area - YES
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES
Methane Hazard Site - Methane Zone
Near Source Zone Distance - 6.9

ZONE(S): C2(PV) /M(PV) /

4. DOCUMENTS

ZI - ZI-1320 Playa Vista (Area D)
ZI - ZI-1874 LA Coastal Transportation
ZA - ZA-2000-1242-YV
ZA - ZA-2000-5255-YV
SPA - Los Angeles Coastal Transportatio
CSPA - Playa Vista (Area D)
PKLY - PKG-LAYOUT-161
ORD - ORD-160523
DTRM - DIR-2000-3257
DTRM - DIR-2000-5369
CPC - CPC-1985-272-PA
CPC - CPC-1991-522-GPA-ZC
CPC - CPC-1991-523-HD
CPC - CPC-1999-2507-PAD-PV
CPC - CPC-1999-3186-PAD-PV
CPC - CPC-1999-500-PAD-PV

5. CHECKLIST ITEMS

Storm Water - NOI/SWPPP-5 acres and greater

LA Department of Building and Safety
LA 05 28 126721 10/14/04 10:07AM

ONE STOP SURCH	$179.
CITY PLANNING SURCH	$269.
MISCELLANEOUS	$5.
SYSTEM FEE	$538.
Total Due:	$992.
Check:	$992.

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co Llc — 12555 Jefferson Blvd STE 300 — LOS ANGELES CA 90066

Tenant:

Applicant: (Relationship: Agent for Owner)
Moe Lahooti - (310) 564-3591

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

Erosion control plan for Playa Vista Area D for 2004 to 2005. Modify grade elevation to divert site drainage to existing detention basin. Include stockpile of 30,000 cy of earth and 15,000 cy of base material. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB)

9. # Bldgs on Site & Use: VACANT

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
DAS PC By:
OK for Cashier: Truong Huynh
Coord. OK:
Signature:
Date:

For Cashier's Use Only W/O #: 43003292

Project: PLAYA VISTA

LA Department of Building and Safety
LA 05 28 126720 10/14/04 09:59AM

GRADING PERMIT	$4,725.
GRADING PLAN CHECK	$4,252.
Total Due:	$8,977.
No Fee:	$8,977.

NO FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 12707 W TEALE ST
Auth: WAIVED FEE LETTER
Dept: PLAYA VISTA

04LA 654357

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 45,000 cu yd
PC Valuation:

FINAL TOTAL Grading	9,970.03
Permit Fee Subtotal Grading	4,725.00
Plan Check Subtotal Grading	4,252.50
O.S. Surcharge	179.55
Sys. Surcharge	538.65
Planning Surcharge	269.33
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	0.00

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

Plot Plan

P0403010000003292FY

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashier only

04LA 65437
10/14/04 09:59:45
LA05 T-126720 C 28
04030-10000-03292

PERMIT # _____-_____-_____

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		
FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		
ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

FOR INSPECTION REQUESTS, PLEASE CALL
1- (888) - LA-4-BUILD (524-2845)

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		
POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		
FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

AQMD Sign-Off Required ☐ YES ☐ NO

12200 W Jefferson Blvd
12100 W Jefferson Blvd

Area D (Playa Vista)

Permit #: 04030 - 10000 - 03171
Plan Check #: G04LA0156 Printed: 10/14/04 08:59 AM
Event Code:

Grading
mmercial
Plan Check at Counter
No Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 10/14/2004

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RANCHO LA BALLONA		RAMONA S DE MACHADO	246.0306441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
TR 6265		107		M B 134-41/44	105B165 528	4211 - 011 - 027
TR 6265		106		M B 134-41/44	105B165 530	4211 - 011 - 027
RANCHO LA BALLONA		RAMONA S DE MACHADO	246.0306	D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO	246.0306450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO	246.0306441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevation
Airport Hazard Area - 200' Height Limit Above Elevation
Airport Hazard Area - 250' Height Limit Above Elevation
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.01
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES
Methane Hazard Site - Methane Zone
Near Source Zone Distance - 6.3
Thomas Brothers Map Grid - 672-D7

ZONE(S): C2(PV)/M(PV)/

4. DOCUMENTS

ZI - ZI-0000 Grading Pre-Inspection Req
ZI - ZI-1320 Playa Vista (Area D)
ZI - ZI-1874 LA Coastal Transportation
ZA - ZA-2000-1242-YV
ZA - ZA-2000-5255-YV
SPA - Los Angeles Coastal Transportatio
CSPA - Playa Vista (Area D)
PKLY - PKG-LAYOUT-161
ORD - ORD-160523
ORD - ORD-170785
DTRM - DIR-2000-3257
DTRM - DIR-2000-5369
CPC - CPC-1985-272-PA
CPC - CPC-1991-522-GPA-ZC
CPC - CPC-1991-523-HD
CPC - CPC-1995-276-ZC-GPA

5. CHECKLIST ITEMS

Storm Water - NOI/SWPPP-5 acres and greater

LA Department of Building and Safety
LA 05 28 126733 10/14/04 10:04AM

ONE STOP SURCH	$39.
SYSTEMS DEVT FEE	$119
CITY PLANNING SURCH	$59.
MISCELLANEOUS	$5.
Total Due:	$224.
Check:	$224.

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co Llc — 12555 Jefferson Blvd STE 300 — LOS ANGELES CA 90066

Tenant:

Applicant: (Relationship: Agent for Owner)
Moe Lahooti - (310) 564-3591

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

Erosion control plan for Playa Vista Area D for 2004 to 2005. Modify grade elevation to divert site drainage to existing detention basin. Environmental impacts caused by the permitted activity, a component of the Phase I Project, were previously analyzed in the Phase I EIR, No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510.

9. # Bldgs on Site & Use: VACANT

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By:
DAS PC By:
OK for Cashier: Truong Huynh
Coord. OK:
Signature:
Date:

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

For Cashier's Use Only W/O #: 43003171

LA Department of Building and Safety
LA 05 28 126722 10/14/04 10:04AM

GRADING PERMIT	$1,975.
GRADING PLAN CHECK	$20.
Total Due:	$1,995.
No Fee:	$1,995.

NO FEE NO FEE NO FEE
Name: PLAYA CAPITAL
Addr: 12200 W JEFFERSON BLVD
Auth: WAIVED FEE LETTER
Dept: PLAYA VISTA

D4LA 65438

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 5,000 cu yd
PC Valuation:

FINAL TOTAL Grading	2,219.45
Permit Fee Subtotal Grading	1,975.00
O.S. Surcharge	39.90
Sys. Surcharge	119.70
Planning Surcharge	59.85
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	20.00

Sewer Cap ID:
Total Bond(s) Due:

12. ATTACHMENTS

Plot Plan

P04030100000031171FN

INSPECTION RECORD

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

For use by cashier only

04LA 65438
10/14/04 10:04:58
LA05 T-126722 C 28
04030-10000-03171

PERMIT # _____-_____-_____

ADDRESS

JOB DESCRIPTION

INSPECTION RECORDS AND PLANS MUST BE AVAILABLE WHEN REQUESTED

GRADING INSPECTIONS		
TYPE	DATE	INSPECTOR
Initial Grading		
Toe or Bottom		
Soils Report Approved		
DO NOT PLACE FILL UNTIL ABOVE IS SIGNED		
Backfill		
Fill		
Excavation		
Drainage Devices		
Rough Grading		
Approved Compaction Report		
FOOTING INSPECTIONS		
Footing Excavation		
Forms		
Reinforcing Steel		
OK to Place Footings		
GROUNDWORK INSPECTIONS		
Electrical		
Plumbing		
Gas Piping		
Heating & Refrigeration		
Disabled Access		
OK to Place Floor		
DO NOT PLACE FLOOR UNTIL ABOVE IS SIGNED		
ROUGH INSPECTIONS		
Electrical		
Electrical Life Safety		
Plumbing		
Fire Sprinkler		
Heating & Refrigeration		
Roof Sheathing		
Framing		
Insulation		
Disabled Access		
Elevator		
Suspended Ceiling		
OK to Cover		

FOR INSPECTION REQUESTS, PLEASE CALL
1- (888) - LA-4-BUILD (524-2845)

DO NOT COVER UNTIL PREVIOUS IS SIGNED		
Exterior Lathing		
Interior Lathing		
Drywall		
OK to Cover Walls		
DO NOT COVER UNTIL ABOVE IS SIGNED		
WORK OUTSIDE OF THE BUILDING		
Electrical Underground		
Gas		
Heating & Refrigeration		
Sewer		
Disabled Access		
POOL INSPECTIONS		
TYPE	DATE	INSPECTOR
Excavation		
Reinforcing Steel		
Bonding		
Piping		
Pre-Gunite		
Deck		
Enclosure/Fence		
Pool/Spa Cover		
OK to Fill Pool		
DO NOT FILL POOL UNTIL ABOVE IS SIGNED		
FINAL INSPECTIONS		
Grading		
Electrical		
Electrical Life Safety		
Plumbing		
Gas		
Gas Test		
Heating & Refrigeration		
Elevator		
Fire Sprinkler		
Disabled Access		
LAFD (Title 19 only)		
LAFD Fire Life Safety		
Pool Final		
AQMD sign-off provided		
PROJECT FINAL		

AQMD Sign-Off Required ☐ YES ☐ NO

STORM WATER POLLUTION EROSION CONTROL PLAN NOTES:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN ON THE GRADING PLAN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED OR MODIFIED AS AND WHEN THE INSPECTOR SO DIRECTS AS THE WORK PROGRESSES.

2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED BY THE INSPECTOR.

3. WHEN THE INSPECTOR SO DIRECTS, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.

4. A.) VELOCITY CHECK DAMS SHALL BE PROVIDED ACROSS THE OUTLETS OF ALL LOTS DRAINING INTO THE STREET.
   B.) ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGE OF THE FILL.

5. STANDBY CREWS SHALL BE ALERTED BY THE PERMITTEE OR CONTRACTOR FOR EMERGENCY WORK DURING RAINSTORMS.

6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING DOWNWARD, TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT SHALL NOT EXCEED THE FOLLOWING:

GRADE OF THE STREET	INTERVAL AS REQUIRED
LESS THAN 2%	100 FEET
2% TO 4%	50 FEET
4% TO 10%	25 FEET
OVER 10%	

7. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED STREET AREAS AT THE INTERVALS INDICATED ABOVE. VELOCITY CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS, TIMBER, OR OTHER EROSION-RESISTANT MATERIALS APPROVED BY THE INSPECTOR, AND SHALL EXTEND COMPLETELY ACROSS THE STREET OR CHANNEL AT RIGHT ANGLES TO THE CENTERLINE. EARTH DIKES MAY NOT BE USED AS VELOCITY CHECK DAMS.

8. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED GRADED CHANNELS AT THE INTERVALS INDICATED BELOW.

GRADE OF CHANNEL	INTERVALS BETWEEN CHECK DAMS
LESS THAN 3%	100 FEET
3% TO 6%	50 FEET
OVER 6%	25 FEET

9. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE ROUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHERE TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.

10. EXCEPT WHEN THE INSPECTOR DIRECTS OTHERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN RAIN IS FORECAST, AND SHALL BE MAINTAINED DURING THE RAINY SEASON (OCTOBER 1 TO APRIL 15).

11. ALL BASINS AND CHECK DAMS SHALL HAVE THE DEBRIS AND SILT REMOVED AFTER EACH STORM TO RESTORE THEIR CAPACITY.

12. SANDBAGS SHALL BE STOCKPILED ON-SITE, READY TO BE PLACED IN POSITION WHEN RAIN IS FORECAST, OR WHEN THE INSPECTOR SO DIRECTS.

13. BRUSH AND GROUND COVER MAY NOT BE REMOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN NOVEMBER 1 AND APRIL 15.

14. IN CASE OF EMERGENCY, DURING BUSINESS HOURS, CALL MR. CLIFF RITZ, PLAYA CAPITAL CO. AT (310) 345-6941. DURING NON-BUSINESS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ADDITIONAL STORM WATER POLLUTION EROSION CONTROL NOTES:

1. THE EROSION CONTROL MEASURES SHOWN HEREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT, BASED UPON CITY OF LOS ANGELES CRITERIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL OR MORE STRINGENT MEASURES ARE REQUIRED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS AVAILABLE FOR REVIEW IN THE CONSTRUCTION TRAILER.

2. ALL CUT AND FILL SLOPES ADJACENT TO PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT, UNLESS PLANTED, HYDROSEEDED, AND/OR STABILIZED THROUGH OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

3. TOE OF ALL CONSTRUCTION SLOPES SHALL BE PROTECTED WITH SILT FENCE. SANDBAGS OR OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

4. EROSION FROM BARE SOIL AREAS SHALL BE CONTROLLED WITH SOIL SEALANT. SANDBAGS AND/OR OTHER MEASURES AS APPROVED BY THE CONSTRUCTION MANAGER.

5. THE SOIL SEALANT MUST BE OF THE TYPE SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL (AS APPROVED BY THE CONSTRUCTION MANAGER).

COMPLIANCE WITH THE GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES:

1. OWNER HAS FILED WITH THE STATE WATER RESOURCES CONTROL BOARD A NOTICE OF INTENT (NOI) TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES (GENERAL PERMIT). IN ACCORDANCE WITH THE REQUIREMENTS OF THE GENERAL PERMIT, OWNER HAS PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) FOR THE PROJECT.

2. OWNER RECOGNIZES THAT THE PHYSICAL CHARACTERISTICS OF THE PROJECT SITE, THE PLANNED SITE IMPROVEMENTS, AND THE MEANS, METHODS, AND SEQUENCE OF WORK SELECTED BY THE CONTRACTOR MAY AFFECT THE QUALITY OF STORM WATER DISCHARGES FROM THE SITE, BOTH DURING AND AFTER CONSTRUCTION ACTIVITY. ACCORDINGLY, THE SWPPP FOR THE PROJECT REQUIRES IMPLEMENTATION OF POLLUTANT CONTROL PRACTICES AT THREE LEVELS: 1) SPECIFIC MANDATORY PRACTICES THAT MUST BE IMPLEMENTED AS SPECIFIED; 2) ALTERNATIVE MANDATORY PRACTICES WHERE THE CONTRACTOR SELECTS FROM LISTED PRACTICES THE ALTERNATIVE THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK; AND 3) PRACTICES WHERE THE CONTRACTOR SELECTS THE CONTROL PRACTICES THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP. HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NONCOMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.
2. FOR INDIVIDUAL DEVELOPMENT SITES, EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.
3. PONDING WATER IS NOT ALLOWED EXCEPT IN APPROVED DETENTION AREAS.

OWNER

PLAYA CAPITAL COMPANY
5510 LINCOLN BLVD., SUITE 100
LOS ANGELES, CA 90094
(310) 822-6074

PROJECT ADDRESS

350,000 CY STOCKPILE- G.P. #03LA44101
200,000 CY STOCKPILE- G.P. #01LA09040
12023.5 BLUFF CREEK DR.
LOS ANGELES, CA 90094

100,000 CY STOCKPILE- G.P. #03LA48084
13258 BLUFF CREEK DR.
LOS ANGELES, CA 90094

2,700 CY STOCKPILE- G.P. #01LA22354
12210 BLUFF CREEK DR.
LOS ANGELES, CA 90094

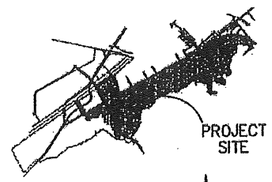
170 CY STOCKPILE- G.P. #01LA22356
12500 BLUFF CREEK DR.
LOS ANGELES, CA 90094

846,000 CY STOCKPILE- G.P. #01LA16030
13250 JEFFERSON BLVD.
LOS ANGELES, CA 90094

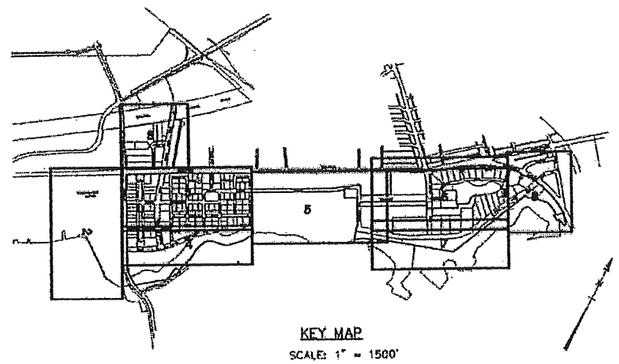
125,000 CY STOCKPILE- G.P. #03LA42400
12800 JEFFERSON BLVD.
LOS ANGELES, CA 90094

500,000 CY STOCKPILE- G.P. #03LA42399
12707 TEALE ST. (1250.5 TEAL ST.)
LOS ANGELES, CA 90094

TEMPORARY DRAINAGE & CONSTRUCTION ROAD RELOCATION - G.P. #99LA88182
1,100,000 CY STOCKPILE- G.P. #98LA78695
6775 CENTINELA AVE.
LOS ANGELES, CA 90066



VICINITY MAP
SCALE: 1" = 3000'



KEY MAP
SCALE: 1" = 1500'

APPROVED FOR EROSION CONTROL
FROM OCTOBER 15, 2004 TO APRIL 15, 2005
DISTRICT ENGINEER-WLA by LC DATE 9-30-04

GRADING REQUIRED FOR DRAINAGE: CUT= 5,000 CY
FILL= 25,000 CY
IMPORT (FROM APPROVED ON-SITE STOCKPILE)= 20,000 CY
*SEE SHEET 11 FOR LOCATIONS AND MATERIAL FROM EXISTING STOCKPILES.

Department of Building & Safety, City of Los Angeles
Preliminary Plan Check
APPROVED
DATE: 10-14-04
DISTRICT MAP NO. 64B30 - 10000 - 05121
64B30 - 10000 - 05122

REV	DATE	DESCRIPTION

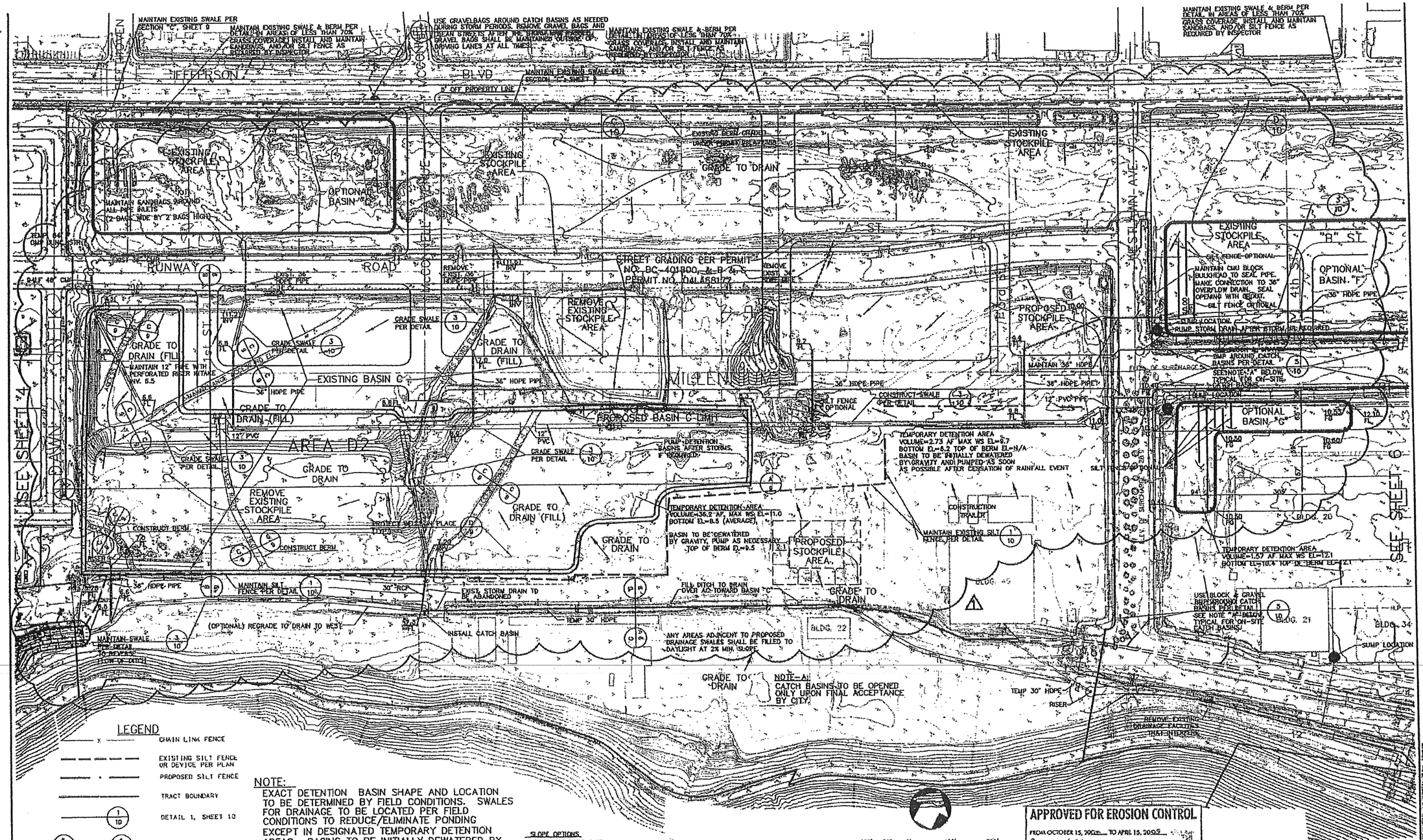
REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CAGLIANO No. C48944 Exp. 9-30-06 CIVIL STATE OF CALIFORNIA

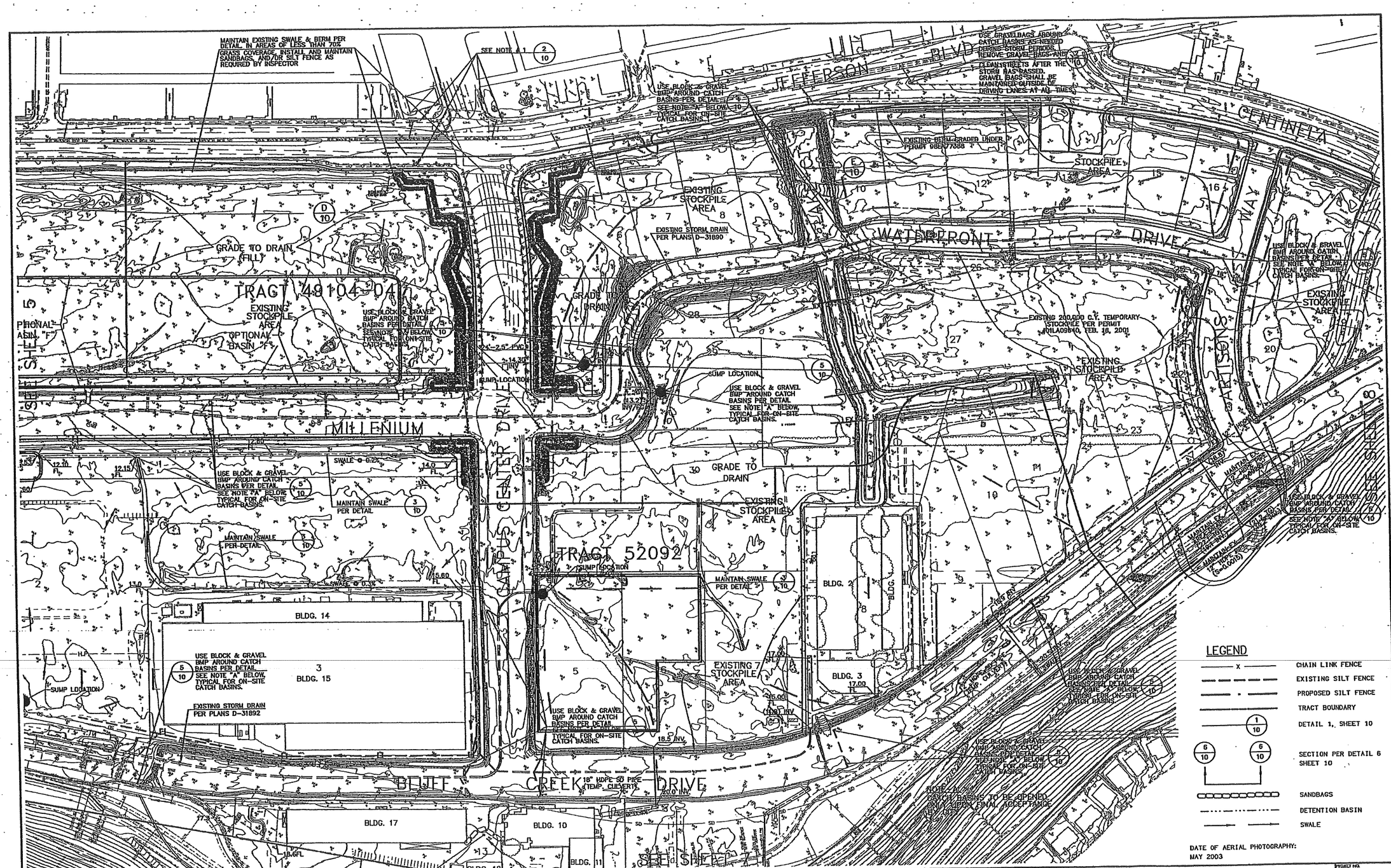
PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. CAGLIANO RCE 48944 — 9/29/04 DATE

PLAYA VISTA AREA D EROSION CONTROL 2004/2005
TITLE SHEET

PROJECT NO. 1PCC0207.12
SHEET 1 OF 11


JEFFERSON BLVD
RUNWAY
ROAD
MILLENNIUM
DAWN CREEK
WESTLAWN AVE
4th ST
"A" ST
"B" ST
EXISTING STOCKPILE AREA
OPTIONAL BASIN "E"
OPTIONAL BASIN "F"
OPTIONAL BASIN "G"
PROPOSED STOCKPILE AREA
REMOVE EXISTING STOCKPILE AREA
EXISTING BASIN C
AREA D2
PROPOSED BASIN C LIMIT
MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9
MAINTAIN EXISTING SWALE & BERM PER DETAIL IN AREAS OF LESS THAN 70% GRASS COVERAGE INSTALL AND MAINTAIN SANDBAGS, AND/OR SILT FENCE AS REQUIRED BY INSPECTOR
USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES
5' OFF PROPERTY LINE
STREET GRADING PER PERMIT NO. BC-401800 & B & S PERMIT NO. DAL#881177
GRADE TO DRAIN
GRADE TO DRAIN (FILL)
GRADE SWALE PER DETAIL
MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)
MAINTAIN 12" PIPE WITH PERFORATED RISER INTAKE INV. 6.5
36" HDPE PIPE
12" PVC
REMOVE EXISTING 36" HDPE PIPE
CONSTRUCT BERM
PROTECT WETLAND PLANTS TYP.
TEMPORARY DETENTION AREA VOLUME=36.2 AF, MAX WS EL=11.0 BOTTOM EL=8.5 (AVERAGE), BASIN TO BE DEWATERED BY GRAVITY, PUMP AS NECESSARY TOP OF BERM EL=9.5
PUMP DETENTION BASINS AFTER STORMS IF REQUIRED
TEMPORARY DETENTION AREA VOLUME=2.73 AF MAX WS EL=9.7 BOTTOM EL=8.2 TOP OF BERM EL=N/A BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT
TEMPORARY DETENTION AREA VOLUME=1.37 AF MAX WS EL=12.1 BOTTOM EL=10.4 TOP OF BERM EL=12.1
MAINTAIN SILT FENCE PER DETAIL
SILT FENCE OPTIONAL
CONSTRUCTION TRAILER
BLDG. 45
BLDG. 20
BLDG. 22
BLDG. 21
BLDG. 34
SUMP LOCATION
INSTALL CATCH BASIN
FILL DITCH TO DRAIN OVER AC TOWARD BASIN "C"
EXIST STORM DRAIN TO BE ABANDONED
30" RCP
TEMP 30" HDPE
RISER
(OPTIONAL) REGRADE TO DRAIN TO WEST
MAINTAIN SWALE PER DETAIL TO REMOVE FLOW OF DITCH
ANY AREAS ADJACENT TO PROPOSED DRAINAGE SWALES SHALL BE FILLED TO DAYLIGHT AT 2% MIN. SLOPE
NOTE: ALL CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY.
USE BLOCK & GRAVEL BREAKDOWN CATCH BASINS PER DETAIL SEE NOTE "A" BELOW, TYPICAL FOR ON-SITE CATCH BASINS
REMOVE EXISTING DRAINAGE FACILITIES
SEE NOTE "A" BELOW, TYPICAL FOR ON-SITE CATCH BASINS
SILT FENCE OPTIONAL
CONSTRUCT SWALE PER DETAIL
MAINTAIN 36" HDPE
12" PVC PIPE
SILT FENCE OPTIONAL
SILT FENCE OPTIONAL
SILT FENCE OPTIONAL



SLOPE OPTIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

NOTE
CONDUCT BRUSHING 1/MONTH TO CONTROL SEED CONVEYANCE TO FWM.

50' 0' 100' 100' 200'
Note: For reduced size prints, original scale is in inches.

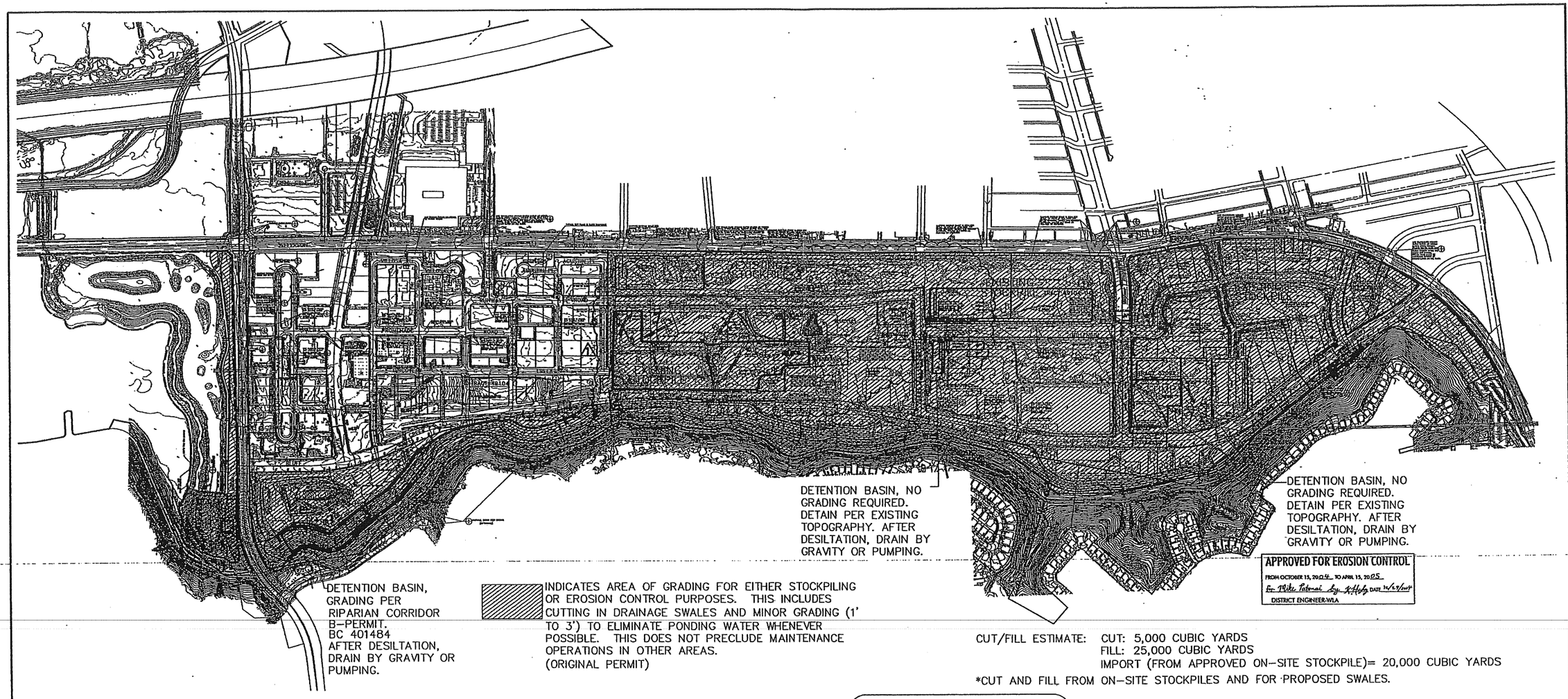
REV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. C48944 Exp. 9-30-06 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)
MICHAEL J. CREHAN RCE 48944 9/29/04 DATE

PLAYA VISTA
EROSION CONTROL 2004/2005
TRACT 49104-04 & 52092

PROJECT NO. 1PCC0207.12
SHEET 6 OF 11

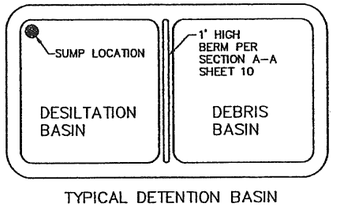


INDICATES AREA OF GRADING FOR EITHER STOCKPILING OR EROSION CONTROL PURPOSES. THIS INCLUDES CUTTING IN DRAINAGE SWALES AND MINOR GRADING (1' TO 3') TO ELIMINATE PONDING WATER WHENEVER POSSIBLE. THIS DOES NOT PRECLUDE MAINTENANCE OPERATIONS IN OTHER AREAS. (ORIGINAL PERMIT)

APPROVED FOR EROSION CONTROL
FROM OCTOBER 15, 2004 TO APRIL 15, 2005
for Mike Peterson by [signature] DATE 10/29/04
DISTRICT ENGINEER-WLA

CUT/FILL ESTIMATE: CUT: 5,000 CUBIC YARDS
FILL: 25,000 CUBIC YARDS
IMPORT (FROM APPROVED ON-SITE STOCKPILE)= 20,000 CUBIC YARDS

*CUT AND FILL FROM ON-SITE STOCKPILES AND FOR PROPOSED SWALES.



TYPICAL DETENTION BASIN

NOTE: DEBRIS BASIN MINIMUM SIZE, 50' x 50'

REGISTERED PROFESSIONAL ENGINEER — No. 48944 — CIVIL — STATE OF CALIFORNIA
12/28/04

Erosion Control Composite - 04/05

PSOMAS

DATE: 09-08-03 REVISED ON:
JOB No:1PCC0207.12

SHEET 11 OF 11
PV1564-11

Playa Capital Company, LLC
Playa Vista Development

REV	DATE	DESCRIPTION
7	12/27/04	REVISED TO INDICATE TRACT 60110-01 STREET GRADING.
6		REALIGNED SWALE FROM WESTLAWN TO DAWN CREEK.
5		REMOVED EXISTING STOCKPILE AREA IN BASIN C.
4		INSTALLED 30" HDPE DIRECTING FLOWS NORTH OF MILLENNIUM TO THE SOUTH.
3		CONSTRUCT BERM SOUTH OF MILLENNIUM & WEST OF BASIN C.
2		INSTALLED RISER TO HDPE FROM BASIN C TO RIPARIAN CORRIDOR.
1		

300' 150' 0' 300' 600'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

Printed: 12/28/04 09:06:33 P:\PVista\PV1564-MP\DRAWINGS\Grading\PV1564-11.dwg jhanson

12100 W Jefferson Blvd
12200 W Jefferson Blvd

Permit #: 05030 - 10000 - 01911
Plan Check #: X05LA00445 Printed: 06/30/05 10:13 AM
Event Code:

Grading
Commercial
Plan Check at Counter
No Plan Check

City of Los Angeles - Department of Building and Safety

APPLICATION FOR GRADING PERMIT AND GRADING CERTIFICATE

Last Status: Ready to Issue
Status Date: 06/30/2005

1. TRACT	BLOCK	LOT(s)	ARB	COUNTY MAP REF #	PARCEL ID # (PIN #)	2. ASSESSOR PARCEL #
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 12	4211 - 013 - 043
TR 6265		107		M B 134-41/44	105B165 528	4211 - 011 - 027
TR 6265		106		M B 134-41/44	105B165 530	4211 - 011 - 027
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030		D C C 2722 C F 64	102B161 1110	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	450	D C C 2722 C F 64	102B161 1115	4211 - 013 - 043
RANCHO LA BALLONA		RAMONA S DE MACHADO 246.030	441	D C C 2722 C F 64	102B161 1140	4211 - 013 - 043

3. PARCEL INFORMATION

Airport Hazard Area - 150' Height Limit Above Elevatio
Airport Hazard Area - 200' Height Limit Above Elevatio
Airport Hazard Area - 250' Height Limit Above Elevatio
Area Planning Commission - West Los Angeles
LADBS Branch Office - WLA
Council District - 11
Certified Neighborhood Council - Westchester-Playa del
Community Plan Area - Westchester - Playa del Rey
Census Tract - 2756.01
Energy Zone - 6
Fire District - 2
Earthquake-Induced Liquefaction Area - YES
Methane Hazard Site - Methane Zone
Near Source Zone Distance - 6.3
Thomas Brothers Map Grid - 672-D7

ZONE(S): C2(PV) /M(PV) /

4. DOCUMENTS

ZA - ZA-2000-1242-YV	ORD - ORD-160523	CPC - CPC-1985-272-PA	CPC - CPC-1999-2507-PAD-PV
SPA - Los Angeles Coastal Transportatic	ORD - ORD-170785	CPC - CPC-1991-522-GPA-ZC	CPC - CPC-1999-3186-PAD-PV
SPA - Playa Vista (Area D)	DTRM - DIR-2000-3257	CPC - CPC-1991-523-HD	CPC - CPC-1999-500-PAD-PV
PKLY - PKG-LAYOUT-161	DTRM - DIR-2000-5369	CPC - CPC-1995-276-ZC-GPA	CPC - CPC-2000-241-PAD-PV

5. CHECKLIST ITEMS

Storm Water - NOI/SWPPP-5 acres and greater

LA Department of Building and Safety
LA 03 28 141731 06/30/05 10:42AM

ONE STOP SURCH $84.
SYSTEMS DEVT FEE $254.
CITY PLANNING SURCH $254.
CITY PLANNING SURCH $5.0
Total Due: $599.
Check: $619.
Credit Slip 1: -$20.

6. PROPERTY OWNER, TENANT, APPLICANT INFORMATION

Owner(s):
Playa Capital Co 5510 Lincoln Blvd STE 100 LOS ANGELES CA 90094 310-822-0070

Tenant:
Applicant: (Relationship: Agent for Owner)
Moe Lahooti - (310) 564-3591

7. EXISTING USE

PROPOSED USE
(60) Grading - Non-Hillside

8. DESCRIPTION OF WORK

Erosion control plan for Playa Vista Area D for 2005 to 2006. Modify grade elevation to divert site drainage to existing detention basin..

9. # Bldgs on Site & Use: VACANT

For information and/or inspection requests originating within LA County,
Call toll-free (888) LA4BUILD
Outside LA County, call (213) 482-0000. (LA4BUILD = 524-2845)

10. APPLICATION PROCESSING INFORMATION

BLDG. PC By: DAS PC By:
OK for Cashier: Truong Huynh Coord. OK:
Signature: Date:

For Cashier's Use Only W/O #: 53001911

Project: PLAYA VISTA

LA Department of Building and Safety
LA 03 28 141730 06/30/05 10:40AM

GRADING PERMIT
GRADING PLAN CHECK

Total Due:
No Fee:
NO FEE NO FEE NO FEE
Name: PLAYA VISTA
Addr: 12100 W JEFFERSON BLVD
Auth: WAIVED FEE LETTER
Dept: PLAYA VISTA

05LA 77223

11. PROJECT VALUATION & FEE INFORMATION Final Fee Period

Permit Valuation: 40,000 cu yd PC Valuation:

FINAL TOTAL Grading	4,844.30
Permit Fee Subtotal Grading	4,225.00
O.S. Surcharge	84.90
Sys. Surcharge	254.70
Planning Surcharge	254.70
Planning Surcharge Misc Fee	5.00
Permit Issuing Fee	20.00

Sewer Cap ID: Total Bond(s) Due:

12. ATTACHMENTS

P050301000001911FY

13. STRUCTURE INVENTORY (Note: Numeric measurement data in the format "number / number" implies "change in numeric value / total resulting numeric value") 05030 - 10000 - 01911

(P) Cut: +5000 Cuyd /
Fill: +5000 Cuyd /
Max Slope for Fill: +2 Horiz / 1 Vert

14. APPLICATION COMMENTS

Request for modification dated 10/14/2004 approved.

In the event that any box (i.e. 1-16) is filled to capacity, it is possible that additional information has been captured electronically and could not be printed due to space restrictions. Nevertheless, the information printed exceeds that required by Section 19825 of the Health and Safety Code of the State of California.

15. Building Relocated From:

16. CONTRACTOR, ARCHITECT, & ENGINEER NAME ADDRESS CLASS LICENSE# PHONE #

(O) , Owner-Builder 0

PERMIT EXPIRATION/REFUNDS: This permit expires two years after the date of the permit issuance. This permit will also expire if no construction work is performed for a continuous period of 180 days (Sec. 98.0602 LAMC). Claims for refund of fees paid must be filed within one year from the date of expiration for permits granted by LADBS (Sec. 22.12 & 22.13 LAMC). The permittee may be entitled to reimbursement of permit fees if the Department fails to conduct an inspection within 60 days of receiving a request for final inspection (HS 17951).

17. OWNER-BUILDER DECLARATION

I hereby affirm under penalty of perjury that I am exempt from the Contractors' State License Law for the following reason (Section 7031.5, Business and Professions Code: Any city or county which requires a permit to construct, alter, improve, demolish, or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he or she is licensed pursuant to the provisions of the Contractors License Law (chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he or she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).):

( ) I, as the owner of the property, or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year from completion, the owner-builder will have the burden of proving that he or she did not build or improve for the purpose of sale).

OR

( ) I, as the owner of the property, am exclusively contracting with licensed contractors to construct the project (Sec. 7044, Business & Professions Code: The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractors License Law.)

18. WORKERS' COMPENSATION DECLARATION

I hereby affirm, under penalty of perjury, one of the following declarations:

( ) I have and will maintain a certificate of consent to self insure for workers' compensation, as provided for by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued.

( ) I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:

Carrier:_____ Policy Number:_____

( ) I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall forthwith comply with those provisions.

WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS ($100,000), IN ADDITION TO THE COST OF COMPENSATION, DAMAGES AS PROVIDED FOR IN SECTION 3706 OF THE LABOR CODE, INTEREST, AND ATTORNEY'S FEES.

19. ASBESTOS REMOVAL DECLARATION / LEAD HAZARD WARNING

I certify that notification of asbestos removal is either not applicable or was sent to the AQMD or EPA as per section 19827.5 of the Health and Safety Code. Due to the possible presence of lead-based paint, lead safe work practices are required on all repairs in pre-1979 buildings that disturb paint. Failure to do so could create lead hazards that violate California Health and Safety Code Section 17920.10 and Section 105256 and may be subject to a $1000 fine or criminal prosecution. For more information call LA County's Department of Health Services at (800)524-5323. In order to locate a Lead Certified Professional and obtain additional information, call California DHS at (800)597-5323 or go to the DHS Website at http://www.dhs.ca.gov/childlead/html/GENelist.html.

20. FINAL DECLARATION

I certify that I have read this application INCLUDING THE ABOVE DECLARATIONS and state that the above information INCLUDING THE ABOVE DECLARATIONS is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes. I realize that this permit is an application for inspection and that it does not approve or authorize the work specified herein, and it does not authorize or permit any violation or failure to comply with any applicable law. Furthermore, neither the City of Los Angeles nor any board, department officer, or employee thereof, make any warranty, nor shall be responsible for the formance or results of any work described herein, nor the condition of the property nor the soil upon which such work is performed. I further affirm under penalty of perjury, that the proposed k will not destroy or unreasonably interfere with any access or utility easement belonging to others and located on my property, but in the event such work does destroy or unreasonably interfere ...th such easement, a substitute easement(s) satisfactory to the holder(s) of the easement will be provided (Sec. 91.0106.4.3.4 LAMC).

By signing below, I certify that:

(1) I accept all the declarations above namely the Owner-Builder Declaration, Workers' Compensation Declaration, Asbestos Removal Declaration / Lead Hazard Warning and Final Declaration; and
(2) This permit is being obtained with the consent of the legal owner of the property.

Print Name:_____ Sign:_____ Date:_____ ☐ Owner ☐ Authorized Agent

STORM WATER POLLUTION EROSION CONTROL PLAN NOTES:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN ON THE GRADING PLAN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED OR MODIFIED AS AND WHEN THE INSPECTOR SO DIRECTS AS THE WORK PROGRESSES.

2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED BY THE INSPECTOR.

3. WHEN THE INSPECTOR SO DIRECTS, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.

4. A.) VELOCITY CHECK DAMS SHALL BE PROVIDED ACROSS THE OUTLETS OF ALL LOTS DRAINING INTO THE STREET.
   B.) ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGE OF THE FILL.

5. STANDBY CREWS SHALL BE ALERTED BY THE PERMITTEE OR CONTRACTOR FOR EMERGENCY WORK DURING RAINSTORMS.

6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING DOWNWARD, TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT SHALL NOT EXCEED THE FOLLOWING:

GRADE OF THE STREET	INTERVAL AS REQUIRED
LESS THAN 2%	100 FEET
2% TO 4%	50 FEET
4% TO 10%	25 FEET
OVER 10%	25 FEET

7. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED STREET AREAS AT THE INTERVALS INDICATED ABOVE. VELOCITY CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS, TIMBER, OR OTHER EROSION-RESISTANT MATERIALS APPROVED BY THE INSPECTOR, AND SHALL EXTEND COMPLETELY ACROSS THE STREET OR CHANNEL AT RIGHT ANGLES TO THE CENTERLINE. EARTH DIKES MAY NOT BE USED AS VELOCITY CHECK DAMS.

8. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED GRADED CHANNELS AT THE INTERVALS INDICATED BELOW.

GRADE OF CHANNEL	INTERVALS BETWEEN CHECK DAMS
LESS THAN 3%	100 FEET
3% TO 5%	50 FEET
OVER 6%	25 FEET

9. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE MOUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHERE TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.

10. EXCEPT WHEN THE INSPECTOR DIRECTS OTHERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN RAIN IS FORECAST, AND SHALL BE MAINTAINED DURING THE RAINY SEASON (OCTOBER 1 TO APRIL 15).

11. ALL BASINS AND CHECK DAMS SHALL HAVE THE DEBRIS AND SILT REMOVED AFTER EACH STORM TO RESTORE THEIR CAPACITY.

12. SANDBAGS SHALL BE STOCKPILED ON-SITE, READY TO BE PLACED IN POSITION WHEN RAIN IS FORECAST, OR WHEN THE INSPECTOR SO DIRECTS.

13. BRUSH AND GROUND COVER MAY NOT BE REMOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN NOVEMBER 1 AND APRIL 15.

14. IN CASE OF EMERGENCY, DURING BUSINESS HOURS, CALL MR. CLIFF RITZ, PLAYA CAPITAL CO. AT (310) 345-6941. DURING NON-BUSINESS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ADDITIONAL STORM WATER POLLUTION EROSION CONTROL NOTES:

1. THE EROSION CONTROL MEASURES SHOWN HEREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT, BASED UPON CITY OF LOS ANGELES CRITERIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL OR MORE STRINGENT MEASURES ARE REQUIRED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS AVAILABLE FOR REVIEW IN THE CONSTRUCTION TRAILER.

2. ALL CUT AND FILL SLOPES ADJACENT TO PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT, UNLESS PLANTED, HYDROSEEDED, AND/OR STABILIZED THROUGH OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

3. TOE OF ALL CONSTRUCTION SLOPES SHALL BE PROTECTED WITH SILT FENCE, SANDBAGS OR OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

4. EROSION FROM BARE SOIL AREAS SHALL BE CONTROLLED WITH SOIL SEALANT, SANDBAGS AND/OR OTHER MEASURES AS APPROVED BY THE CONSTRUCTION MANAGER.

5. THE SOIL SEALANT MUST BE OF THE TYPE SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL (AS APPROVED BY THE CONSTRUCTION MANAGER).

COMPLIANCE WITH THE GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES:

1. OWNER HAS FILED WITH THE STATE WATER RESOURCES CONTROL BOARD A NOTICE OF INTENT (NOI) TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES (GENERAL PERMIT). IN ACCORDANCE WITH THE REQUIREMENTS OF THE GENERAL PERMIT, OWNER HAS PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) FOR THE PROJECT.

2. OWNER RECOGNIZES THAT THE PHYSICAL CHARACTERISTICS OF THE PROJECT SITE, THE PLANNED SITE IMPROVEMENTS, AND THE MEANS, METHODS, AND SEQUENCE OF WORK SELECTED BY THE CONTRACTOR MAY AFFECT THE QUALITY OF STORM WATER DISCHARGES FROM THE SITE, BOTH DURING AND AFTER CONSTRUCTION ACTIVITY. ACCORDINGLY, THE SWPPP FOR THE PROJECT REQUIRES IMPLEMENTATION OF POLLUTANT CONTROL PRACTICES AT THREE LEVELS: 1) SPECIFIC MANDATORY PRACTICES THAT MUST BE IMPLEMENTED AS SPECIFIED; 2) ALTERNATIVE MANDATORY PRACTICES WHERE THE CONTRACTOR SELECTS FROM LISTED PRACTICES THE ALTERNATIVE THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK; AND 3) PRACTICES WHERE THE CONTRACTOR SELECTS THE CONTROL PRACTICES THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP. HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NONCOMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.
2. FOR INDIVIDUAL DEVELOPMENT SITES, EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.
3. PONDING WATER IS NOT ALLOWED EXCEPT IN APPROVED DETENTION AREAS.

OWNER

PLAYA CAPITAL COMPANY
5510 LINCOLN BLVD., SUITE 100
LOS ANGELES, CA 90094
(310) 822-0074

PROJECT ADDRESS

350,000 CY STOCKPILE- G.P. #03LA44101
200,000 CY STOCKPILE- G.P. #01LA09540

12023.5 BLUFF CREEK DR.
LOS ANGELES, CA 90094

100,000 CY STOCKPILE- G.P. #03LA48084

13258 BLUFF CREEK DR.
LOS ANGELES, CA 90094

2,700 CY STOCKPILE- G.P. #01LA22354

12210 BLUFF CREEK DR.
LOS ANGELES, CA 90094

170 CY STOCKPILE- G.P. #01LA22356

12500 BLUFF CREEK DR.
LOS ANGELES, CA 90094

846,000 CY STOCKPILE- G.P. #01LA16850

13250 JEFFERSON BLVD.
LOS ANGELES, CA 90094

125,000 CY STOCKPILE- G.P. #03LA42400

12800 JEFFERSON BLVD.
LOS ANGELES, CA 90094

500,000 CY STOCKPILE- G.P. #03LA42399

12707 TEALE ST. (1250.5 TEAL ST.)
LOS ANGELES, CA 90094

TEMPORARY DRAINAGE & CONSTRUCTION ROAD RELOCATION - G.P. #99LA88182
1,100,000 CY STOCKPILE- G.P. #98LA78695

6775 CENTINELA AVE.
LOS ANGELES, CA 90066

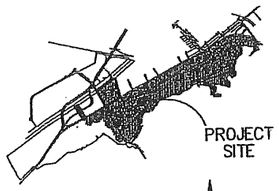
Department of Building & Safety, City of Los Angeles
Building Plan Check

APPROVED

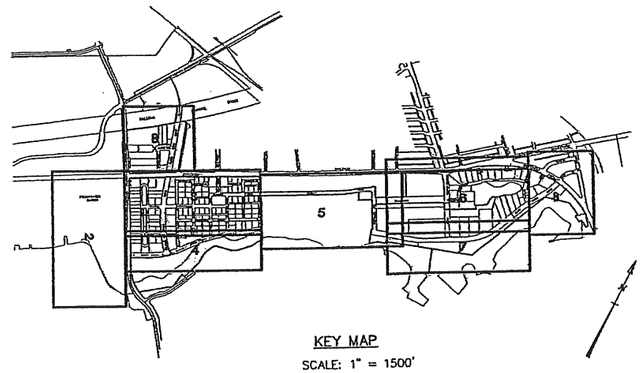
This set of plans MUST be at the job site during construction. It is unlawful to alter, change, or deviate from these plans, without approval from the Dept. of Building and Safety. The stamping of this plan SHALL NOT be held to permit or to be an approval of the violation of any provisions of any Ordinance or Law. This approval does not include any details or references made to any ELECTRICAL, PLUMBING, HEATING or REFRIGERATION work. SEPARATE permits are required for these trades, unless this permit was issued as a combination permit for a One or Two Family Dwelling pursuant to LAMC Section 91.0107.2.2. and this work by this trade does not require Plan Check.

BY: _____ DATE: 6/30/05

Building PERMIT NO.: 05LD3-10000-01911



VICINITY MAP
SCALE: 1" = 3000'



KEY MAP
SCALE: 1" = 1500'

APPROVED FOR EROSION CONTROL
FROM OCTOBER 15, 2005 TO APRIL 15, 2006
Linda Patora: DATE 6/24/05
DISTRICT ENGINEER-WLA

GRADING REQUIRED FOR DRAINAGE: CUT= 40,000 CY
FILL= 5,000 CY

*SEE SHEET 11 FOR LOCATIONS AND MATERIAL FROM EXISTING STOCKPILES.

These plans have been reviewed for conformance to Geotechnical recommendations only, made by Group Delta Consultants Inc., dated 6-29-05 (LOG-349). No Civil, Structural, or Architectural calculations, discussions or other details were reviewed in this review.
6-30-05
Geotechnical Engineer Date

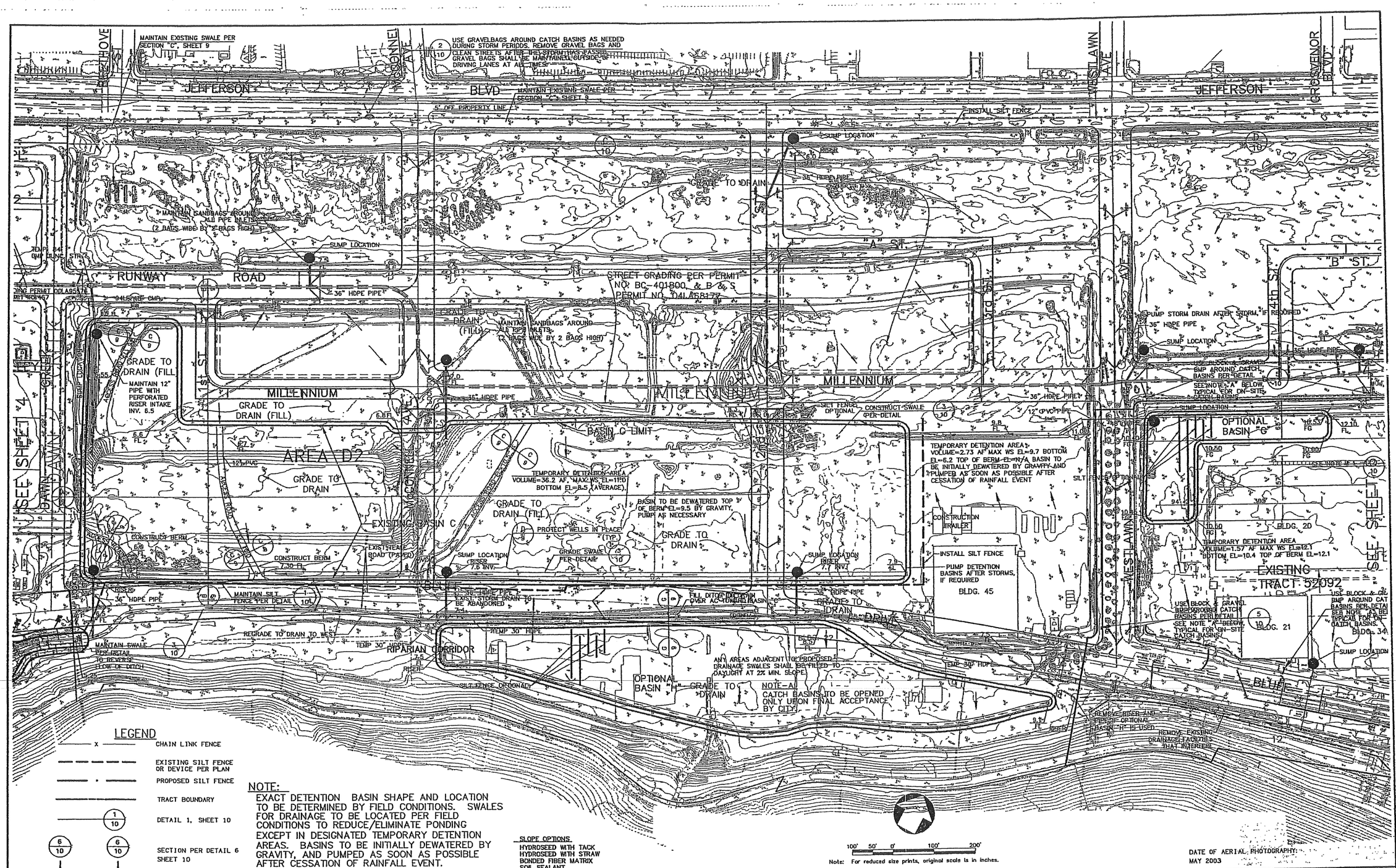
REV	DATE	DESCRIPTION
△		
△		
△		
△		
△		
△		
△		
△		

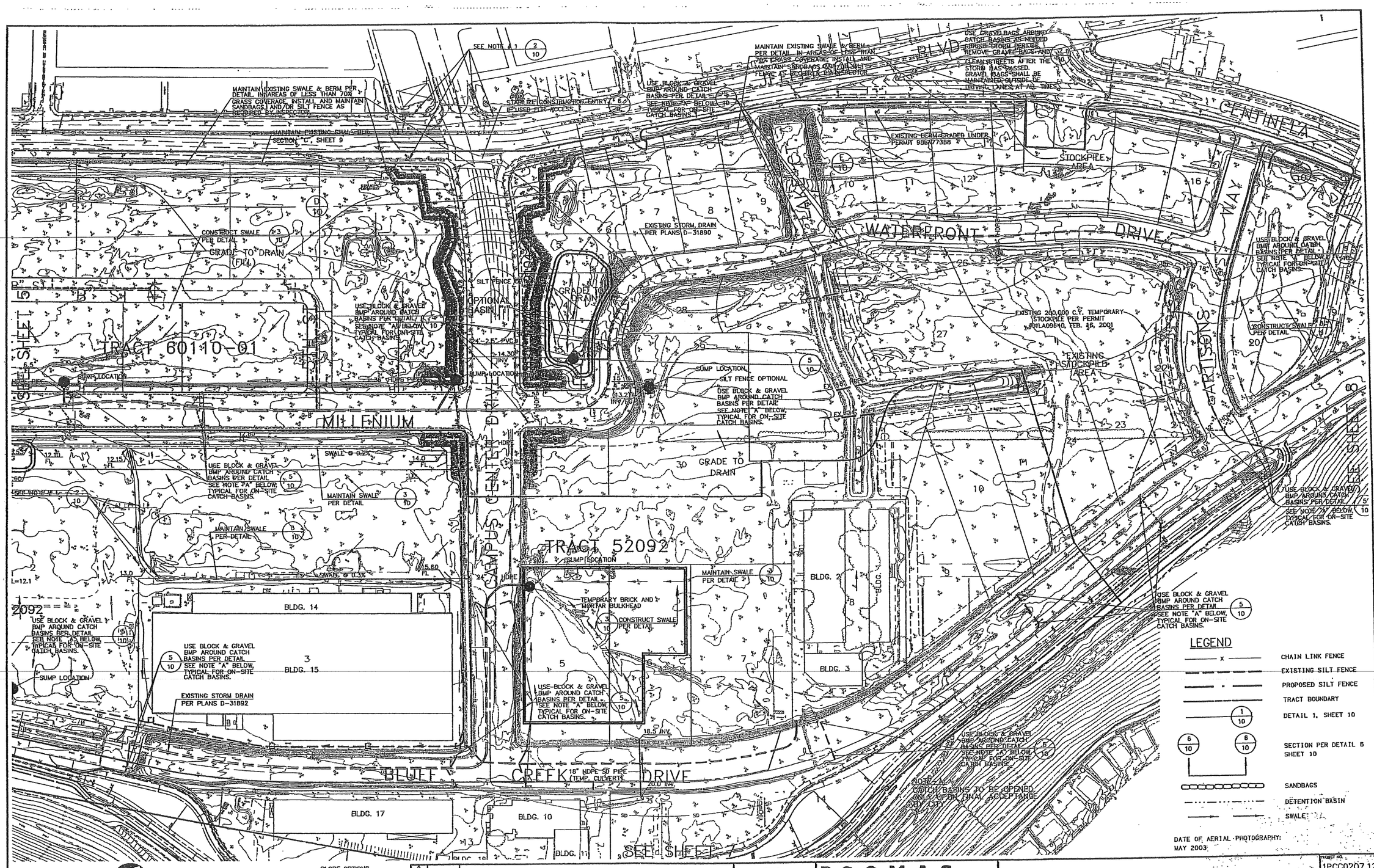
REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. 48944 Exp. 9-30-06 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)
MICHAEL J. CREHAN RCE 48944 6/9/05 DATE

PLAYA VISTA AREA D EROSION CONTROL 2005/2006
TITLE SHEET

PROJECT NO. 1PCC0207.12
SHEET 1 OF 11
PV 1619-01


MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9
USE GRAVELBAGS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS. REMOVE GRAVEL BAGS AND CLEAN STREETS AFTER THE STORM HAS PASSED. GRAVEL BAGS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES
JEFFERSON BLVD
MAINTAIN EXISTING SWALE PER SECTION "C", SHEET 9
5' OFF PROPERTY LINE
INSTALL SILT FENCE
SUMP LOCATION
RISER
36" HDPE PIPE
GRADE TO DRAIN
"A" ST.
"B" ST.
WESTLAWN AVE
GROSVENOR BLVD.
MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)
SUMP LOCATION
RUNWAY ROAD
36" HDPE PIPE
STREET GRADING PER PERMIT NO. BC-401800 & B & S PERMIT NO. 041 ARB177
PUMP STORM DRAIN AFTER STORM, IF REQUIRED
36" HDPE PIPE
SUMP LOCATION
GRADE TO DRAIN (FILL)
MAINTAIN SANDBAGS AROUND ALL PIPE INLETS (2 BAGS WIDE BY 2 BAGS HIGH)
USE BLOCK & GRAVEL SNP AROUND CATCH BASINS PER DETAIL SEE NOTE "A" BELOW, TYPICAL FOR ON-SITE CATCH BASINS
GRADE TO DRAIN (FILL)
MAINTAIN 12" PIPE WITH PERFORATED RISER INTAKE INV. 6.5
MILLENNIUM
GRADE TO DRAIN (FILL)
36" HDPE PIPE
SILT FENCE OPTIONAL
CONSTRUCT SWALE (PER DETAIL)
36" HDPE PIPE
12" PVC PIPE
SUMP LOCATION
BASIN C LIMIT
AREA D2
TEMPORARY DETENTION AREA VOLUME=36.2 AF, MAX WS EL=11.0 BOTTOM EL=8.5 (AVERAGE).
TEMPORARY DETENTION AREA VOLUME=2.73 AF MAX WS EL=9.7 BOTTOM EL=6.2 TOP OF BERM EL=N/A BASIN TO BE INITIALLY DEWATERED BY GRAVITY AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT
OPTIONAL BASIN "G"
GRADE TO DRAIN
GRADE TO DRAIN (FILL)
BASIN TO BE DEWATERED TOP OF BERM EL=9.5 BY GRAVITY, PUMP AS NECESSARY
PROTECT WELLS IN PLACE (TYP.)
GRADE TO DRAIN
CONSTRUCTION TRAILER
INSTALL SILT FENCE
PUMP DETENTION BASINS AFTER STORMS, IF REQUIRED
BLDG. 45
BLDG. 2D
TEMPORARY DETENTION AREA VOLUME=1.57 AF MAX WS EL=12.1 BOTTOM EL=10.4 TOP OF BERM EL=12.1
EXISTING TRACT 52092
USE BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL SEE NOTE "A" BELOW, TYPICAL FOR ON-SITE CATCH BASINS
BLDG. 21
BLDG. 34
SUMP LOCATION
CONSTRUCT BERM
EXISTING ROAD (PAVED)
SUMP LOCATION
GRADE SWALE PER DETAIL
EXIST. STORM DRAIN TO BE ABANDONED
FILL DITCH BOTTOM OVER AC TOWARD BASIN
MAINTAIN SILT FENCE PER DETAIL
REGRADE TO DRAIN TO WEST
TEMP 30" HDPE
RIPARIAN CORRIDOR
MAINTAIN SWALE PER DETAIL TO REVERSE FLOW OF DITCH
ANY AREAS ADJACENT TO PROPOSED DRAINAGE SWALES SHALL BE FILLED TO DAYLIGHT AT 2% MIN. SLOPE
OPTIONAL BASIN "H"
GRADE TO DRAIN
NOTE-A: CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY
REMOVE RISER AND PIPE IF OPTIONAL BASIN "H" IS USED
REMOVE EXISTING DRAINAGE FACILITIES THAT INTERFERE
SILT FENCE OPTIONAL
SEE SHEET 4
SEE SHEET 6
DRAWN
MCCONNELL AVE
SLOPE
BLUFF
DRW
DRW
DRW



SLOPE OPTIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

NOTE
CONDUCT BRUSHING 1/MONTH TO CONTROL SEED CONVEYANCE TO FWM.

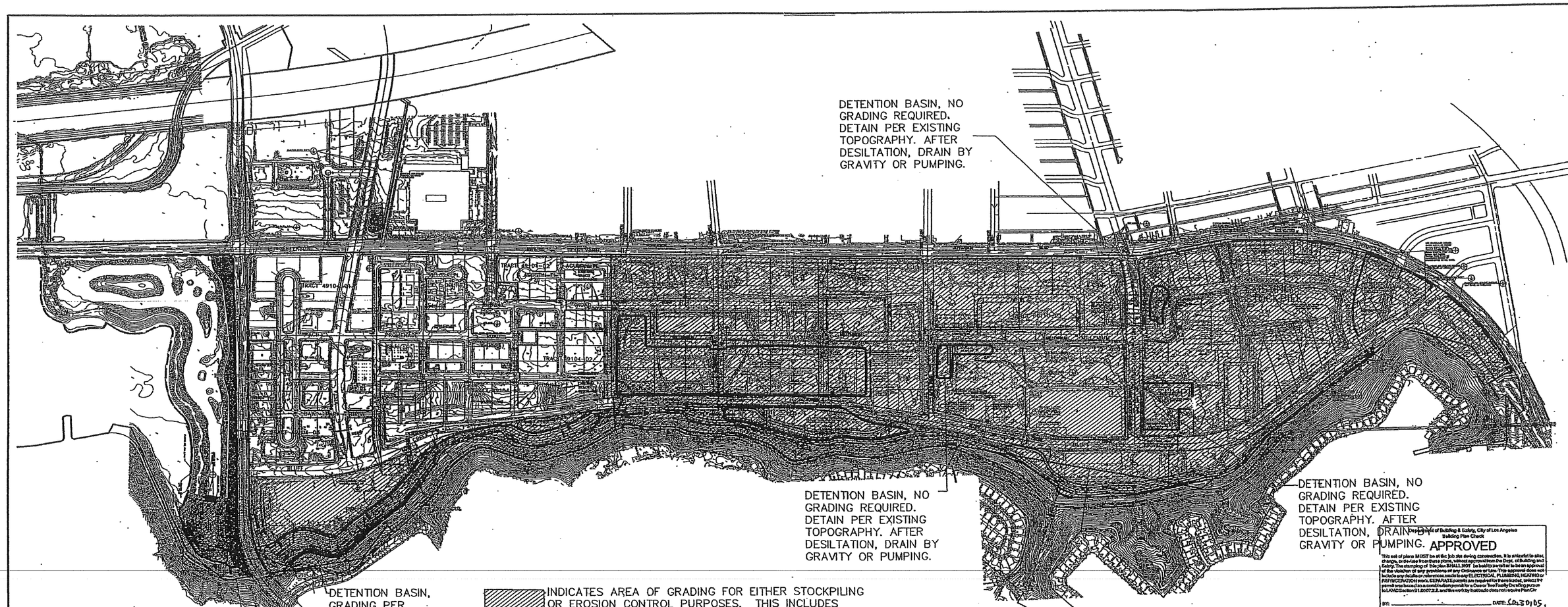
REV	DATE	DESCRIPTION

REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. 48944 Exp. 6-30-06 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)
MICHAEL J. CREHAN RCE 48944 — DATE 6/9/05

PLAYA VISTA
EROSION CONTROL 2005/2006
TRACT 49104-04 & 52092

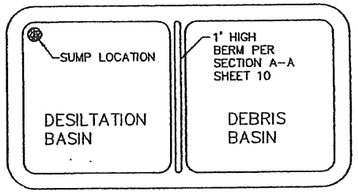
PROJECT NO. 1PCC0207.12
SHEET 6 OF 11
PV 1619-06



INDICATES AREA OF GRADING FOR EITHER STOCKPILING OR EROSION CONTROL PURPOSES. THIS INCLUDES CUTTING IN DRAINAGE SWALES AND MINOR GRADING (1' TO 3') TO ELIMINATE PONDING WATER WHENEVER POSSIBLE. THIS DOES NOT PRECLUDE MAINTENANCE OPERATIONS IN OTHER AREAS. (ORIGINAL PERMIT)

CUT/FILL ESTIMATE: CUT: 40,000 CUBIC YARDS
FILL: 5,000 CUBIC YARDS
EXPORT TO STREET OR LOT GRADING PER APPROVED GRADING PERMIT WITHIN THE 60110 AREA OF THE PROJECT= 35,000 CUBIC YARDS

*CUT AND FILL FROM ON-SITE STOCKPILES AND FOR PROPOSED SWALES.



TYPICAL DETENTION BASIN

NOTE: DEBRIS BASIN MINIMUM SIZE, 50' x 50'

Department of Building & Safety, City of Los Angeles
Building Plan Check
APPROVED
This set of plans MUST be at the job site during construction. It is unlawful to alter, change, or deviate from these plans, without approval from the Dept. of Building and Safety. The stamping of this plan SHALL NOT be held to permit or to be an approval of the violation of any provisions of any Ordinance or Law. This approval does not include any details or references made to any ELECTRICAL, PLUMBING, HEATING or REFRIGERATION work. SEPARATE permits are required for these trades, unless the permits were issued as a consolidation permit by a One or Two Family Dwelling person as LAMC Section 91.107.2.2 and the work by that trade does not require Plan Check.
BY: _____ DATE: 06/30/05
Building PERMIT NO.: 05 030 - 10000 - 01911

Erosion Control Composite - 05/06

Playa Capital Company, LLC
Playa Vista Development

PSOMAS

DATE: 09-08-03 REVISED ON:
JOB No: 1PCC0207.12

SHEET 11 OF 11
PV1619-11

300' 150' 0' 300' 600'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

STORM WATER POLLUTION EROSION CONTROL PLAN NOTES:

1. TEMPORARY EROSION CONTROL DEVICES SHOWN ON THE GRADING PLAN WHICH INTERFERE WITH THE WORK SHALL BE RELOCATED OR MODIFIED AS AND WHEN THE INSPECTOR SO DIRECTS AS THE WORK PROGRESSES.

2. ALL LOOSE SOIL AND DEBRIS SHALL BE REMOVED FROM THE STREET AREAS UPON STARTING OPERATIONS AND PERIODICALLY THEREAFTER AS DIRECTED BY THE INSPECTOR.

3. WHEN THE INSPECTOR SO DIRECTS, A 12-INCH BERM SHALL BE MAINTAINED ALONG THE TOP OF THE SLOPE OF THOSE FILLS ON WHICH GRADING IS NOT IN PROGRESS.

4. A.) VELOCITY CHECK DAMS SHALL BE PROVIDED ACROSS THE OUTLETS OF ALL LOTS DRAINING INTO THE STREET.
   B.) ALL FILLS SHALL BE GRADED TO PROMOTE DRAINAGE AWAY FROM THE EDGE OF THE FILL.

5. STANDBY CREWS SHALL BE ALERTED BY THE PERMITTEE OR CONTRACTOR FOR EMERGENCY WORK DURING RAINSTORMS.

6. ALL UTILITY TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS FROM BOTTOM TO TOP WITH A DOUBLE ROW OF SANDBAGS PRIOR TO BACKFILL. SEWER TRENCHES SHALL BE BLOCKED AT THE PRESCRIBED INTERVALS WITH A DOUBLE ROW OF SANDBAGS EXTENDING DOWNWARD, TWO SANDBAGS FROM THE GRADED SURFACE OF THE STREET. SANDBAGS ARE TO BE PLACED WITH ALTERNATE HEADER AND STRETCHER COURSES. THE INTERVALS PRESCRIBED BETWEEN SANDBAG BLOCKING SHALL DEPEND ON THE SLOPE OF THE GROUND SURFACE, BUT SHALL NOT EXCEED THE FOLLOWING:

GRADE OF THE STREET	INTERVAL
LESS THAN 2%	AS REQUIRED
2% TO 4%	100 FEET
4% TO 10%	50 FEET
OVER 10%	25 FEET

7. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED STREET AREAS AT THE INTERVALS INDICATED ABOVE. VELOCITY CHECK DAMS MAY BE CONSTRUCTED OF SANDBAGS, TIMBER, OR OTHER EROSION-RESISTANT MATERIALS APPROVED BY THE INSPECTOR, AND SHALL EXTEND COMPLETELY ACROSS THE STREET OR CHANNEL AT RIGHT ANGLES TO THE CENTERLINE. EARTH DIKES MAY NOT BE USED AS VELOCITY CHECK DAMS.

8. VELOCITY CHECK DAMS SHALL BE PROVIDED IN ALL UNPAVED GRADED CHANNELS AT THE INTERVALS INDICATED BELOW.

GRADE OF CHANNEL	INTERVALS BETWEEN CHECK DAMS
LESS THAN 3%	100 FEET
3% TO 6%	50 FEET
OVER 6%	25 FEET

9. AFTER SEWER AND UTILITY TRENCHES ARE BACKFILLED AND COMPACTED, THE SURFACES OVER SUCH TRENCHES SHALL BE MOUNDED SLIGHTLY TO PREVENT CHANNELING OF WATER IN THE TRENCH AREA. CARE SHOULD BE EXERCISED TO PROVIDE FOR CROSS FLOW AT FREQUENT INTERVALS WHERE TRENCHES ARE NOT ON THE CENTERLINE OF A CROWNED STREET.

10. EXCEPT WHEN THE INSPECTOR DIRECTS OTHERWISE, ALL DEVICES SHOWN SHALL BE IN PLACE AT THE END OF EACH WORKING DAY WHEN RAIN IS FORECAST, AND SHALL BE MAINTAINED DURING THE RAINY SEASON (OCTOBER 1 TO APRIL 15).

11. ALL BASINS AND CHECK DAMS SHALL HAVE THE DEBRIS AND SILT REMOVED AFTER EACH STORM TO RESTORE THEIR CAPACITY.

12. SANDBAGS SHALL BE STOCKPILED ON-SITE, READY TO BE PLACED IN POSITION WHEN RAIN IS FORECAST, OR WHEN THE INSPECTOR SO DIRECTS.

13. BRUSH AND GROUND COVER MAY NOT BE REMOVED MORE THAN 10 FEET ABOVE FILLS BETWEEN NOVEMBER 1 AND APRIL 15.

14. IN CASE OF EMERGENCY, DURING BUSINESS HOURS, CALL: MR. CLIFF RITZ, PLAYA CAPITAL CO. AT (310) 345-6941. DURING NON-BUSINESS HOURS CALL PROJECT SECURITY AT (310) 305-4000.

ADDITIONAL STORM WATER POLLUTION EROSION CONTROL NOTES:

1. THE EROSION CONTROL MEASURES SHOWN HEREON ARE THE MINIMUM REQUIREMENTS FOR THE PROJECT, BASED UPON CITY OF LOS ANGELES CRITERIA AND PLAYA VISTA PROJECT SWPPP. WHERE ADDITIONAL OR MORE STRINGENT MEASURES ARE REQUIRED BY THE SWPPP, THE SWPPP WILL GOVERN. THE SWPPP IS AVAILABLE FOR REVIEW IN THE CONSTRUCTION TRAILER.

2. ALL CUT AND FILL SLOPES ADJACENT TO PUBLIC STREETS SHALL BE COVERED WITH SOIL SEALANT, UNLESS PLANTED, HYDROSEEDED, AND/OR STABILIZED THROUGH OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

3. TOE OF ALL CONSTRUCTION SLOPES SHALL BE PROTECTED WITH SILT FENCE, SANDBAGS OR OTHER CONSTRUCTION METHODS APPROVED BY THE CONSTRUCTION MANAGER.

4. EROSION FROM BARE SOIL AREAS SHALL BE CONTROLLED WITH SOIL SEALANT, SANDBAGS AND/OR OTHER MEASURES AS APPROVED BY THE CONSTRUCTION MANAGER.

5. THE SOIL SEALANT MUST BE OF THE TYPE SPECIFIED IN THE APPROVED PROJECT SWPPP, OR EQUAL (AS APPROVED BY THE CONSTRUCTION MANAGER).

COMPLIANCE WITH THE GENERAL PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES:

1. OWNER HAS FILED WITH THE STATE WATER RESOURCES CONTROL BOARD A NOTICE OF INTENT (NOI) TO COMPLY WITH THE GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES (GENERAL PERMIT). IN ACCORDANCE WITH THE REQUIREMENTS OF THE GENERAL PERMIT, OWNER HAS PREPARED A STORM WATER POLLUTION PREVENTION PLAN (SWPPP) FOR THE PROJECT.

2. OWNER RECOGNIZES THAT THE PHYSICAL CHARACTERISTICS OF THE PROJECT SITE, THE PLANNED SITE IMPROVEMENTS, AND THE MEANS, METHODS, AND SEQUENCE OF WORK SELECTED BY THE CONTRACTOR MAY AFFECT THE QUALITY OF STORM WATER DISCHARGES FROM THE SITE, BOTH DURING AND AFTER CONSTRUCTION ACTIVITY. ACCORDINGLY, THE SWPPP FOR THE PROJECT REQUIRES IMPLEMENTATION OF POLLUTANT CONTROL PRACTICES AT THREE LEVELS: 1) SPECIFIC MANDATORY PRACTICES THAT MUST BE IMPLEMENTED AS SPECIFIED; 2) ALTERNATIVE MANDATORY PRACTICES WHERE THE CONTRACTOR SELECTS FROM LISTED PRACTICES THE ALTERNATIVE THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK; AND 3) PRACTICES WHERE THE CONTRACTOR SELECTS THE CONTROL PRACTICES THAT BEST FIT THE MEANS, METHODS, AND SEQUENCE OF WORK SO AS TO CONTROL POLLUTANTS IN A MANNER CONSISTENT WITH THE GENERAL PERMIT.

3. CONTRACTOR, IN ASSUMING SOLE, COMPLETE, AND CONTINUOUS RESPONSIBILITY FOR THE CONDITIONS AT THE JOB SITE DURING CONSTRUCTION, SHALL FULLY COMPLY WITH ALL REQUIREMENTS, TERMS, AND CONDITIONS IN THE NOI AND GENERAL PERMIT AND SHALL IMPLEMENT THE SWPPP. CONTRACTOR, IN SUBMITTING A BID FOR THE WORK, CERTIFIES THAT THE NOI, GENERAL PERMIT, AND SWPPP WERE REVIEWED PRIOR TO SUBMITTAL OF THE BID FOR THE PROJECT AND THAT THE COSTS OF COMPLIANCE AND IMPLEMENTATION OF THESE ITEMS ARE INCLUDED IN THE BID PRICE.

4. OWNER RETAINS THE RIGHTS AND POWERS TO EFFECT PROMPT CORRECTIVE ACTION UPON FAILURE BY THE CONTRACTOR TO COMPLY WITH ANY REQUIREMENTS, TERMS, OR CONDITIONS IN THE NOI, GENERAL PERMIT, OR SWPPP. HOWEVER, OWNER'S RETAINING OF THESE RIGHTS DOES NOT OBLIGATE THE OWNER TO EFFECT SAID CORRECTIVE ACTION OR TO NOTIFY CONTRACTOR THAT CORRECTIVE ACTION IS REQUIRED, NOR DOES IT RELIEVE THE CONTRACTOR FROM THE FULL RESPONSIBILITY TO COMPLY. CONDITIONS OF NONCOMPLIANCE DUE TO ANY ACTION OR INACTION OF ANY SUBCONTRACTOR, MATERIAL SUPPLIER, PROVIDER OF SERVICE, OR WORKER ON THE ACCOUNT OF THE CONTRACTOR SHALL BE CONSIDERED A FAILURE BY THE CONTRACTOR TO COMPLY.

5. CONTRACTOR SHALL DESIGNATE IN WRITING THE NAME AND TELEPHONE NUMBER OF THE PERSON RESPONSIBLE FOR IMPLEMENTING THE SWPPP. THE DESIGNATED PERSON SHALL BE AVAILABLE 24 HOURS PER DAY, SEVEN DAYS PER WEEK AND SHALL HAVE THE AUTHORITY TO RESPOND TO STORM WATER POLLUTION ISSUES AND TO IMPLEMENT CORRECTIVE AND PREVENTATIVE MEASURES AS REQUIRED. THE DESIGNATED PERSON AND THE TELEPHONE NUMBER SHALL BECOME PART OF THE SWPPP, A DOCUMENT AVAILABLE TO THE PUBLIC.

GENERAL NOTE

1. CONTRACTOR TO CONSTRUCT STABILIZED CONSTRUCTION ENTRANCES PER BEST MANAGEMENT PRACTICES ESC24.

2. FOR INDIVIDUAL DEVELOPMENT SITES, EVERY CONTRACTOR IS TO PREPARE A WORK SPECIFIC SWPPP TO BE APPROVED BY THE OWNER PRIOR TO COMMENCING WORK. THIS SITE SPECIFIC SWPPP SHALL BE PROVIDED TO THE CONSTRUCTION MANAGER TO MAKE AVAILABLE FOR THE DURATION OF THE CONTRACTOR'S WORK.

3. PONDING WATER IS NOT ALLOWED EXCEPT IN APPROVED DETENTION AREAS. WITHIN DETENTION TIME.

OWNER

PLAYA CAPITAL COMPANY
5510 LINCOLN BLVD., SUITE 100
LOS ANGELES, CA 90094
(310) 822-0074

PROJECT ADDRESS

350,000 CY STOCKPILE- G.P. #03LA44101
200,000 CY STOCKPILE- G.P. #01LA09640

12023.5 BLUFF CREEK DR.
LOS ANGELES, CA 90094

100,000 CY STOCKPILE- G.P. #03LA48084

13258 BLUFF CREEK DR.
LOS ANGELES, CA 90094

2,700 CY STOCKPILE- G.P. #01LA22354

12210 BLUFF CREEK DR.
LOS ANGELES, CA 90094

170 CY STOCKPILE- G.P. #01LA22356

12500 BLUFF CREEK DR.
LOS ANGELES, CA 90094

646,000 CY STOCKPILE- G.P. #01LA16850

13250 JEFFERSON BLVD.
LOS ANGELES, CA 90094

125,000 CY STOCKPILE- G.P. #03LA42400

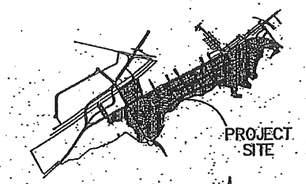
12800 JEFFERSON BLVD.
LOS ANGELES, CA 90094

500,000 CY STOCKPILE- G.P. #03LA42399

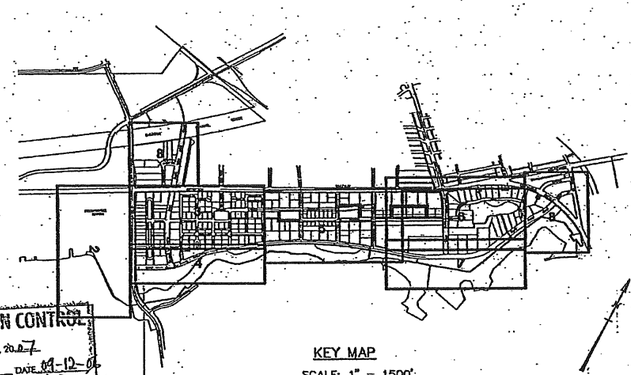
12707 TEALE ST. (1250.5 TEAL ST.)
LOS ANGELES, CA 90094

TEMPORARY DRAINAGE & CONSTRUCTION ROAD RELOCATION
- G.P. #99LA88182
1,100,000 CY STOCKPILE- G.P. #98LA78695

6775 CENTINELA AVE.
LOS ANGELES, CA 90066



VICINITY MAP
SCALE: 1" = 3000'



KEY MAP
SCALE: 1" = 1500'

APPROVED FOR EROSION CONTROL
FROM OCTOBER 15, 2006 TO APRIL 15, 2007
DISTRICT ENGINEER-WLA DATE 09-12-06

GRADING REQUIRED FOR DRAINAGE: CUT= 40,000 CY
FILL= 5,000 CY

*SEE SHEET 11 FOR LOCATIONS AND MATERIAL FROM EXISTING STOCKPILES.

REV	DATE	DESCRIPTION

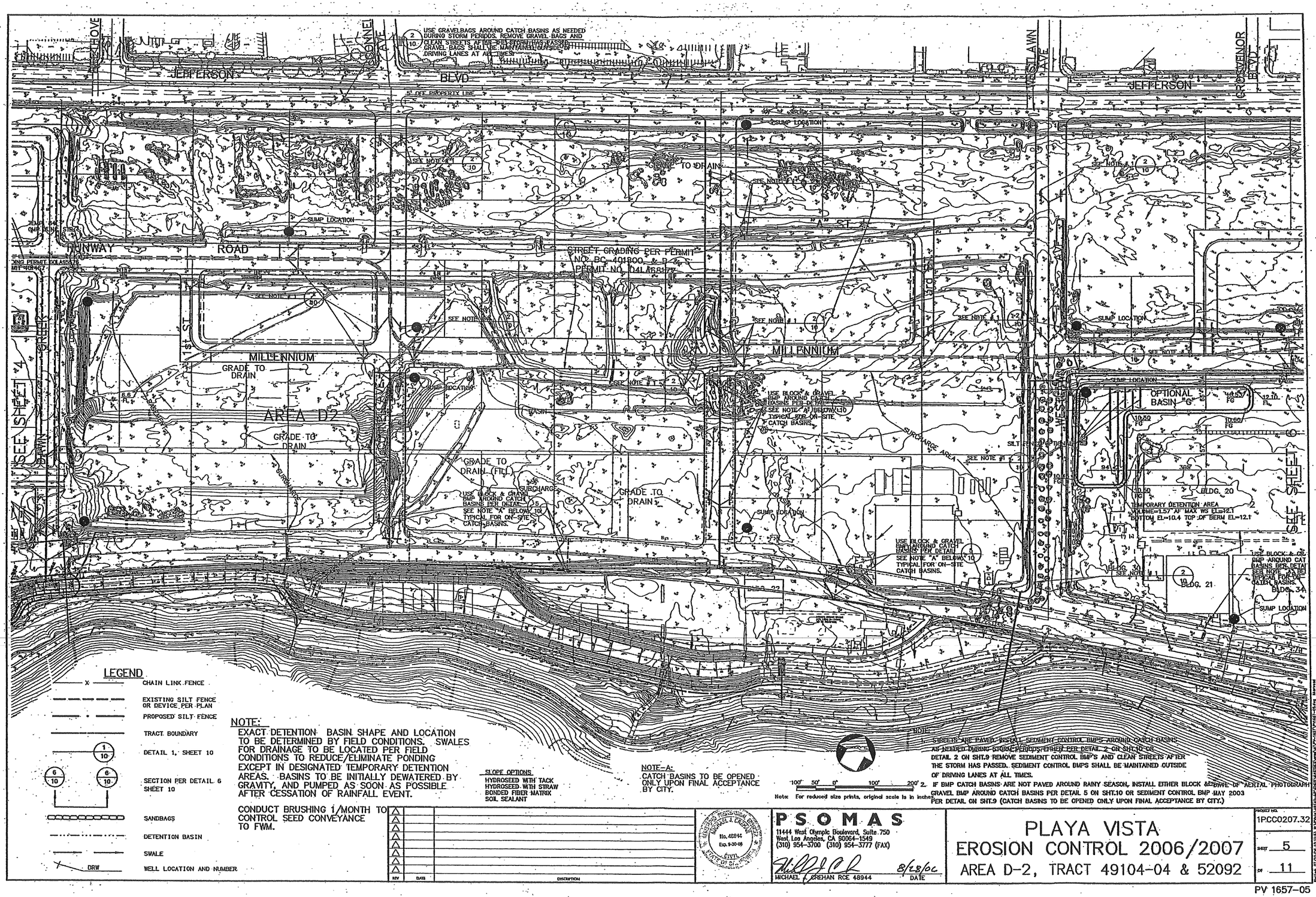
REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN No. 48944 Exp. 9-30-06 CIVIL STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. CREHAN RCE 48944 — DATE 8/28/06

PLAYA VISTA AREA D EROSION CONTROL 2006/2007
TITLE SHEET

PROJECT NO. 1PCC0207.32
SHEET 1
OF 11
FV 1657-01



LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE OR DEVICE PER PLAN
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL 6 SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE
- DRW WELL LOCATION AND NUMBER

NOTE:
EXACT DETENTION BASIN SHAPE AND LOCATION TO BE DETERMINED BY FIELD CONDITIONS. SWALES FOR DRAINAGE TO BE LOCATED PER FIELD CONDITIONS TO REDUCE/ELIMINATE PONDING EXCEPT IN DESIGNATED TEMPORARY DETENTION AREAS. BASINS TO BE INITIALLY DEWATERED BY GRAVITY, AND PUMPED AS SOON AS POSSIBLE AFTER CESSATION OF RAINFALL EVENT.

CONDUCT BRUSHING 1/MONTH TO CONTROL SEED CONVEYANCE TO FWM.

SLOPE OPTIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

NOTE-A:
CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY.

100' 50' 0' 100' 200'
Note: For reduced size prints, original scale is in inches

NOTE:
STREETS ARE PAVED. INSTALL SEDIMENT CONTROL BMPS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS EITHER PER DETAIL 2 ON SHT.9 OR SHT.10 OR DETAIL 2 ON SHT.9 REMOVE SEDIMENT CONTROL BMP'S AND CLEAN STREETS AFTER THE STORM HAS PASSED. SEDIMENT CONTROL BMPS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.
IF BMP CATCH BASINS ARE NOT PAVED AROUND RAINY SEASON, INSTALL EITHER BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5 ON SHT.10 OR SEDIMENT CONTROL BMP MAY 2003 PER DETAIL ON SHT.9 (CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY.)

REV	DATE	DESCRIPTION

No. 48944 Exp. 9-30-08 REGISTERED PROFESSIONAL ENGINEER MICHAEL J. CREHAN CIVIL STATE OF CALIFORNIA

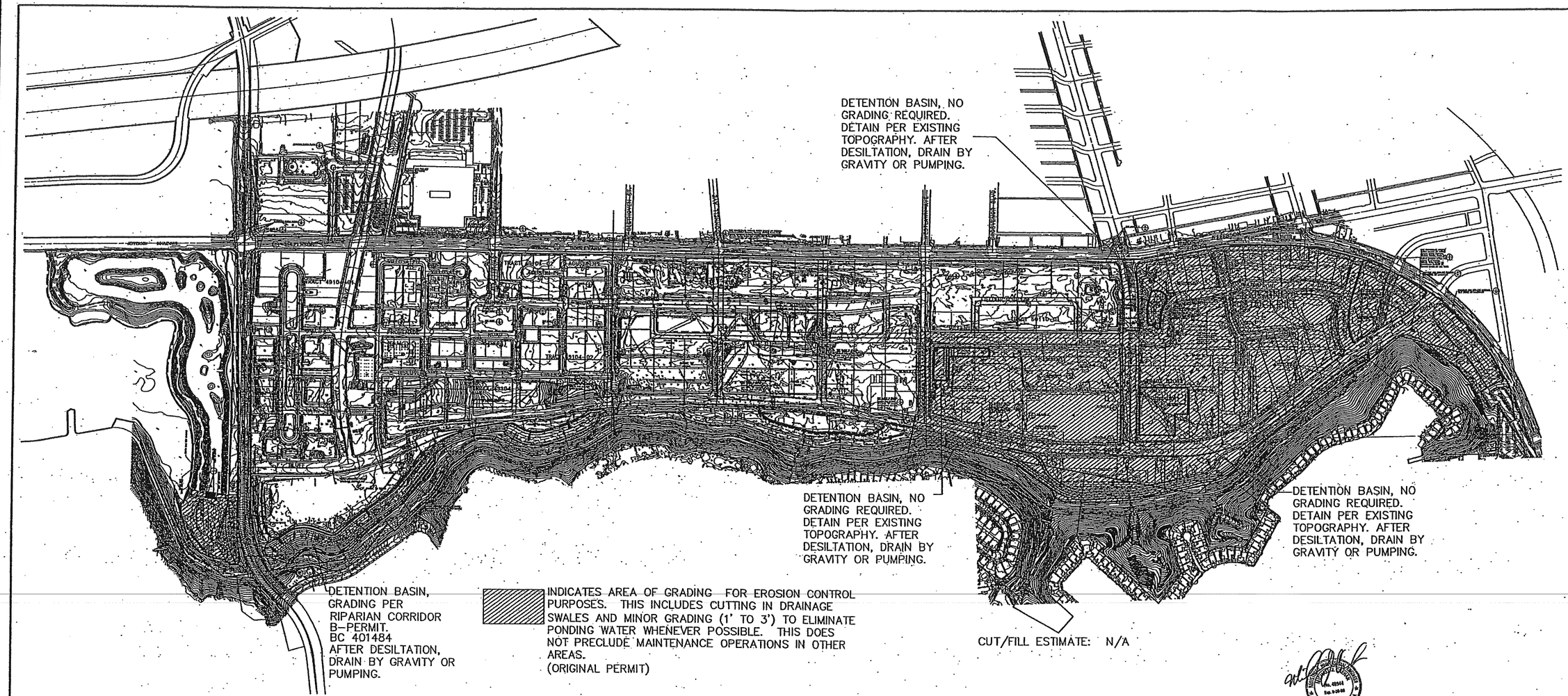
PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

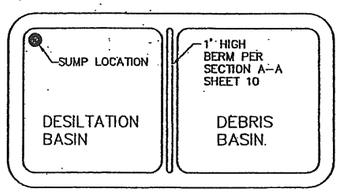
MICHAEL J. CREHAN RCE 48944 — DATE 8/28/06

PLAYA VISTA
EROSION CONTROL 2006/2007
AREA D-2, TRACT 49104-04 & 52092

PROJECT NO. 1PCC0207.32
SHEET 5 OF 11

PV 1657-05





TYPICAL DETENTION BASIN

NOTE: DEBRIS BASIN MINIMUM SIZE, 50' x 50'

Erosion Control 11/11 2006-2007

Playa Capital Company, LLC
Playa Vista Development

REV	DATE	DESCRIPTION

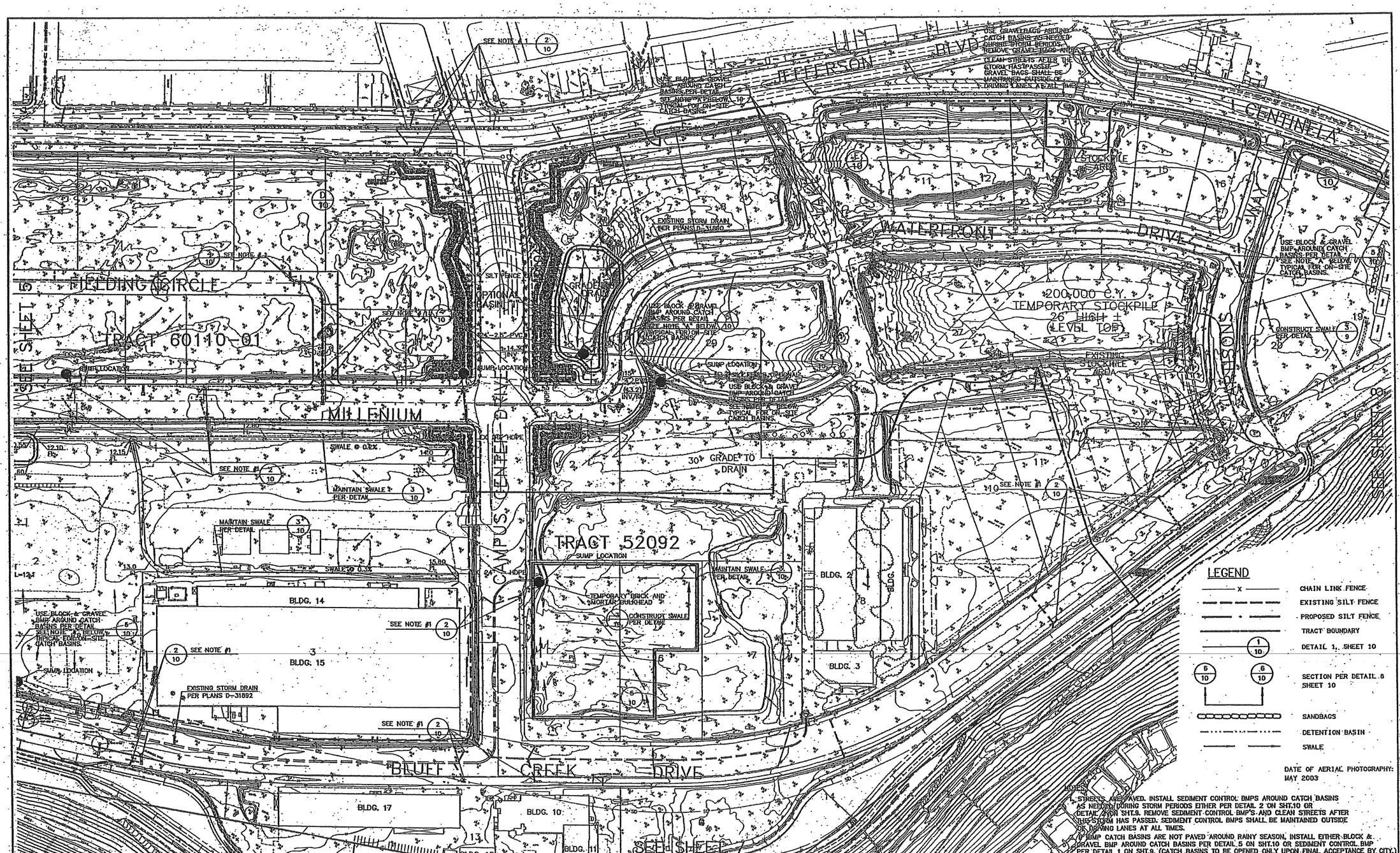
300' 150' 0' 300' 600'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

Erosion Control Composite - 06/07

PSOMAS

DATE: 09-08-03 REVISED ON:
JOB No:1PCC0207.32

SHEET 11 OF 11
PV1657-11



LEGEND

- CHAIN LINK FENCE
- EXISTING SILT FENCE
- PROPOSED SILT FENCE
- TRACT BOUNDARY
- DETAIL 1, SHEET 10
- SECTION PER DETAIL 6 SHEET 10
- SANDBAGS
- DETENTION BASIN
- SWALE

DATE OF AERIAL PHOTOGRAPHY: MAY 2003

NOTES:

1. STREETS ARE PAVED. INSTALL SEDIMENT CONTROL BMPS AROUND CATCH BASINS AS NEEDED DURING STORM PERIODS EITHER PER DETAIL 2 ON SHT.10 OR DETAIL 4 ON SHT.9. REMOVE SEDIMENT CONTROL BMP'S AND CLEAN STREETS AFTER THE STORM HAS PASSED. SEDIMENT CONTROL BMPS SHALL BE MAINTAINED OUTSIDE OF DRIVING LANES AT ALL TIMES.
2. IF BMP CATCH BASINS ARE NOT PAVED AROUND RAINY SEASON, INSTALL EITHER BLOCK & GRAVEL BMP AROUND CATCH BASINS PER DETAIL 5 ON SHT.10 OR SEDIMENT CONTROL BMP PER DETAIL 1 ON SHT.9. (CATCH BASINS TO BE OPENED ONLY UPON FINAL ACCEPTANCE BY CITY.)

SLOPE OPTIONS
HYDROSEED WITH TACK
HYDROSEED WITH STRAW
BONDED FIBER MATRIX
SOIL SEALANT

NOTE
CONDUCT BRUSHING 1/MONTH TO CONTROL SEED CONVEYANCE TO FWM.

50' 0' 100' 100' 200'
Note: For reduced size prints, original scale is in inches.

REV	DATE	DESCRIPTION
△		
△		
△		
△		
△		
△		
△		

REGISTERED PROFESSIONAL ENGINEER — No. 48944 — Exp. 6-30-06 — CIVIL — STATE OF CALIFORNIA

PSOMAS
11444 West Olympic Boulevard, Suite 750
West Los Angeles, CA 90064-1549
(310) 954-3700 (310) 954-3777 (FAX)

MICHAEL J. O'CHAN RCE 48944 — DATE 8/28/06

PLAYA VISTA
EROSION CONTROL 2006/2007
TRACT 49104-04 & 52092

PROJECT NO. 1PCC0207.32
SHEET 6 OF 11

PV 1657-06

APPENDIX D.ii:
ASSESSMENT OF PRESERVATION IN PLACE OF ARCHAEOLOGICAL RESOURCES (CA-LAN-62 LOCUS D AND CA-LAN-211) IN PROPOSED VILLAGE AT PLAYA VISTA PROJECT, STATISTICAL RESEARCH, INC., APRIL 2008

Assessment of Preservation in Place of Archaeological Resources (CA-LAN-62 Locus D and CA-LAN-211) in Proposed Village at Playa Vista Project

John G. Douglass, Donn R. Grenda, and Benjamin R. Vargas

Report prepared for
Playa Capital Company, LLC
5510 Lincoln Boulevard, Suite 100
Playa Vista, CA 90094

Technical Report 14
Statistical Research, Inc.
P.O. Box 390
Redlands, CA 92373

Assessment of Preservation in Place of Archaeological Resources (CA-LAN-62 Locus D and CA-LAN-211) in Proposed Village at Playa Vista Project

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Redlands, CA 92373

April 2008

CONTENTS

List of Figures v

Assessment of Preservation in Place of Archaeological Resources (CA-LAN-62 Locus D and CA-LAN-211) in Proposed Village at Playa Vista Project 1

Introduction 1
Site Conditions 1
Regulatory Framework Required Archaeological Analysis of LAN-62 Locus D and LAN-211 11
Archaeological Work at LAN-62 Locus D and LAN-211 12
Archaeological Boundaries Known in November 2002 and September 2004 15
Archaeological Boundaries Known in September 2007 15
Any Construction within the Boundaries of the Sites Would Likely Impact Archaeological Resources 16
Relocation of the Riparian Corridor 16
Filling of the Existing Riparian Corridor 16
Replacement of Artifacts at the Sites 17
Failure to Curate Artifacts 17
Removal of the Riparian Corridor 18
Removal of Standing Buildings at LAN-211 18
Ponding of Water Atop Archaeological Sites 18
Option 1 21
Implications for Archaeology as of November 2002 and September 2004 21
Implications for Archaeology as of September 2007 21
Option 2 21
Implications for Archaeology as of November 2002 and September 2004 21
Implications for Archaeology as of September 2007 22
Option 3 22
Implications for Archaeology as of November 2002 and September 2004 22
Implications for Archaeology as of September 2007 22
Option 4 25
Implications for Archaeology as of November 2002 and September 2004 25
Implications for Archaeology as of September 2007 25
Option 5 25
Implications for Archaeology as of November 2002 and September 2004 25
Implications for Archaeology as of September 2007 26
Option 6 26
Implications for Archaeology as of November 2002 and September 2004 26
Implications for Archaeology as of September 2007 26

Appendix. Preliminary Report on Data Recovery within the Phase 2 Project Area at CA-LAN-62 Locus D and CA-LAN-211/H, Playa Vista, California 31

References Cited 65

LIST OF FIGURES

Figure 1. Overview of proposed Village at Playa Vista Project (Proposed Project) area, illustrating the location of archaeological sites CA-LAN-62 Locus D and CA-LAN-211/H 3

Figure 2. Aerial photograph of the Hughes Aircraft Company Culver City Plant (now Playa Vista), dated 1954, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to historical-period and modern constructions 5

Figure 3. Aerial photograph of the Hughes Aircraft Company Culver City Plant (now Playa Vista), dated 1954, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to historical-period and modern constructions 6

Figure 4. Aerial plan-view photograph of the Hughes Aircraft Company Culver City Plant (now Playa Vista), dated 1978, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to historical-period and modern buildings 7

Figure 5. Aerial plan-view photograph of the Proposed Project area, dated 2002, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to Hughes Aircraft Company–era historical-period and modern buildings 8

Figure 6. Map of the Proposed Project area, dated 2003, showing existing structures and study areas located within the Proposed Project Site in relation to the locations of CA-LAN-62 Locus D and CA-LAN-211/H 9

Figure 7. Psomas map of the Proposed Project area, illustrating the cut and fill areas associated with the construction of the Riparian Corridor and Hughes Aircraft Company–era paved areas overlaid with the archaeological site boundaries of CA-LAN-62 Locus D and CA-LAN-211/H 13

Figure 8. Map of Option 1: No Riparian Corridor 19

Figure 9. Map of Option 2: No Riparian Corridor with Storm Drain Pipe 23

Figure 10. Map of Option 3: Realigned Riparian and Bluff Creek Dr. to the North 24

Figure 11. Map of Option 4: Alignment Study 27

Figure 12. Map of Option 5: Realignment within Phase 2 28

Figure 13. Map of Option 6: Shallower Realigned Riparian Corridor across Sites 29

Assessment of Preservation in Place of Archaeological Resources (CA-LAN-62 Locus D and CA-LAN-211) in Proposed Village at Playa Vista Project

John G. Douglass, Donn R. Grenda, and Benjamin R. Vargas

Introduction

Statistical Research, Inc. (SRI), was asked to consider the potential for preservation in place of two prehistoric archaeological sites, CA-LAN-62 Locus D and CA-LAN-211/H (hereafter, the CA- prefix and /H will be omitted), in the proposed Village at Playa Vista area (the Proposed Project).[1] Analysis of the preservation in place option requires an understanding of the LAN-62 Locus D and LAN-211 site conditions, the likely nature of the archaeological resources, the possible uses of the LAN-62 Locus D and LAN-211 sites even if one assumes that the resources would have been retained in place, and the possible relocation of the Riparian Corridor (which was constructed in 2005–2007).

This analysis looks at the period that LAN-62 Locus D and LAN-211 were used as part of the Hughes Aircraft plant site (from the early 1940s through the early 1990s), November 2002 (the date of the notice of preparation of the draft environmental impact report [DEIR]), September 2004 (when the environmental impact report [EIR] was certified by the City of Los Angeles), and 2007 (when the Court of Appeal issued its decision).

Site Conditions

Any discussion of preservation in place of the Native American archaeological resources as of any of the 2002, 2004, or 2007 timeframes is dependent on an understanding of the site conditions as they have existed, the now-existing site conditions, and the future "use" of the Proposed Project area containing the archaeological resources.

The site containing LAN-62 Locus D and LAN-211 is located in the southernmost area of the Proposed Project area, adjacent to the Westchester Bluff (referred to herein as the "Sites"), as identified in Figure 1. Figures 2 and 3 show the locations of LAN-211 and LAN-62 Locus D in relation to the Hughes Aircraft Company plant site in 1954. The Sites were extensively developed as part of the Hughes Aircraft plant site and were developed with numerous buildings and supporting infrastructure. Figure 4 shows LAN-211 and LAN-62 Locus D over a 1978 aerial photograph. As indicated, utilization of the Sites continued and intensified from the 1950s through the 1970s. Figure 5 shows the boundaries of the two Sites overlaid on a 2002 aerial

[1]This report analyzes preservation in place for LAN-62 Locus D and LAN-211 because they are the only two archaeological sites within the Proposed Project site eligible for listing in the National Register of Historic Places. Other areas on the Proposed Project site where artifacts were located, but which did not qualify for listing include LAN-2769 and LAN-1932/H. For more information on these sites, see *At the Base of the Bluff*, (Altschul et al. 2003). Please note that Table 1 on page 5 of *At the Base of the Bluff* incorrectly says that LAN-1932/H is eligible for listing; however, this was a typographical error. LAN-1932/H is not eligible for listing because the site was a secondary deposit and information from the site already has been gathered through testing.

photograph; although several of the buildings and paved areas had been removed by this point (discussed below), eight buildings remained, and the majority of the footprint of LAN-211 was still paved.

Each of the buildings that existed in the 2002/2004 timeframes within the site (Buildings 23, 910, 911–913, 915, 923, and the shed along the west side of the former Salvage Yard) were support facilities for the larger Hughes Aircraft Company complex (Figure 6). All of these buildings were initially used for storage purposes except for Building 23, a "test building." Eventually, Building 23 also was used as a storage facility.

Building 23, built between 1941 and 1943, was utilitarian in design, a one-story structure, capped with a flat roof covered and sheathed with stucco. Building 910 was completed prior to 1953 and was used for storage. Buildings 911, 912, and 913 were constructed in 1943. Building 911 was used for paint storage, Building 912 was used for plumbing and electrical storage, and Building 913 was used for janitorial storage. Building 915 (and the shed on the west side of the former Salvage Yard, which was originally part of the Building 915 structure) was used for lumber shelter. Building 923 was constructed in 1951, and was used for ammunition storage.

In addition to the former buildings that were located in the Sites, there were a number of underground utilities that served these buildings. Compressed-air and natural-gas lines ran from former Teale Street to the former Firing Range and Salvage Yard buildings. Buried electrical power lines connected these areas to underground power lines on the north side of former Teale Street. There also were underground pipes carrying steam, chilled water, domestic water, and water for fire protection into the area. Finally, sewer lines from the area connected to sewer lines in former Teale Street, which drained to a lift station to the north and then was pumped up the bluff to the North Outfall Sewer, at a location to the east of the Sites.

As of September 2007, all of these buildings had been demolished, and the utilities and pavement had been removed.

From a soil/groundwater remediation perspective, there are four study areas of potential environmental concern within the vicinity of the Sites (see Figure 6):

- Former Firing Range: The former Firing Range Area was located southwest of Building 22 and east of the former Salvage Yard. The area was used for armament test-firing operations. An initial firing range with two firing bays was extended from the south side of the former firing-range building. In 1966, an additional firing range was built. A firing-range shop was used for gun repair and firing-range offices. According to historical drawings, a spray booth and a solvent settling tank were located in this building. Other former buildings were used as chemical storage buildings. Explosives also were stored in this area. One 31-foot-deep seepage pit and three septic tanks also were located in the area. Buildings in the former Firing Range Area were demolished between 1988 and 1989.

- Former Temporary Drum Storage Area: The former Temporary Drum Storage Area consisted of an asphalt lot south of Building 29 and an unpaved area east of the building. Both areas were used for at least 25 years to store drums with various chemicals (i.e., kerosene, lubricating oils, hydraulic fluids, degreasers, solvents, and antifreeze). Drums of chemicals were stored on the asphalt over five gravel-covered spill traps and on a leakage collection tray that drained into an underground sump. This facility was taken out of service and demolished in 1986–1987.

- Former Salvage Yard: The former Salvage Yard, located southwest of Building 22, was used for storage of chemicals, fuels, and waste from manufacturing, as well as for salvaging used equipment and supplies. Facilities at the former Salvage Yard included three waste solvent sumps, one waste oil sump, chemical drum storage racks, a leakage collection tray and sump, and a surface drain and sump. Other records, such as drawings (plans), suggest that other potential sources of contamination (underground fuel tanks, acid/solvent storage, septic tanks, firing ranges, etc.) may have existed at or in the vicinity of the former Salvage Yard. Volatile organic

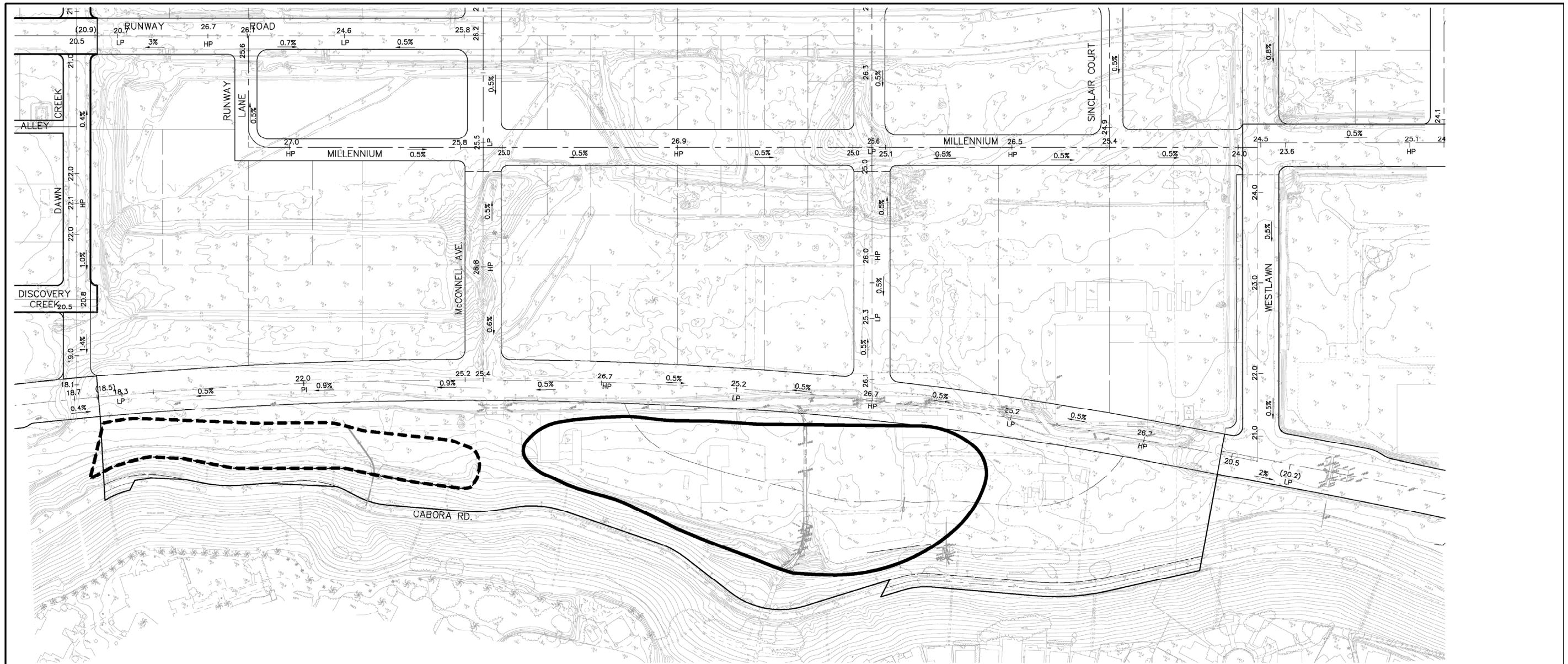


Figure 1. Overview of proposed Village at Playa Vista Project (Proposed Project) area, illustrating the location of archaeological sites CA-LAN-62 Locus D and CA-LAN-211/H.

Figure 2. Aerial photograph of the Hughes Aircraft Company Culver City Plant (now Playa Vista), dated 1954, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to historical-period and modern constructions. View from the northwest looking southeast.

Figure 3. Aerial photograph of the Hughes Aircraft Company Culver City Plant (now Playa Vista), dated 1954, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to historical-period and modern constructions. View from the west looking east.

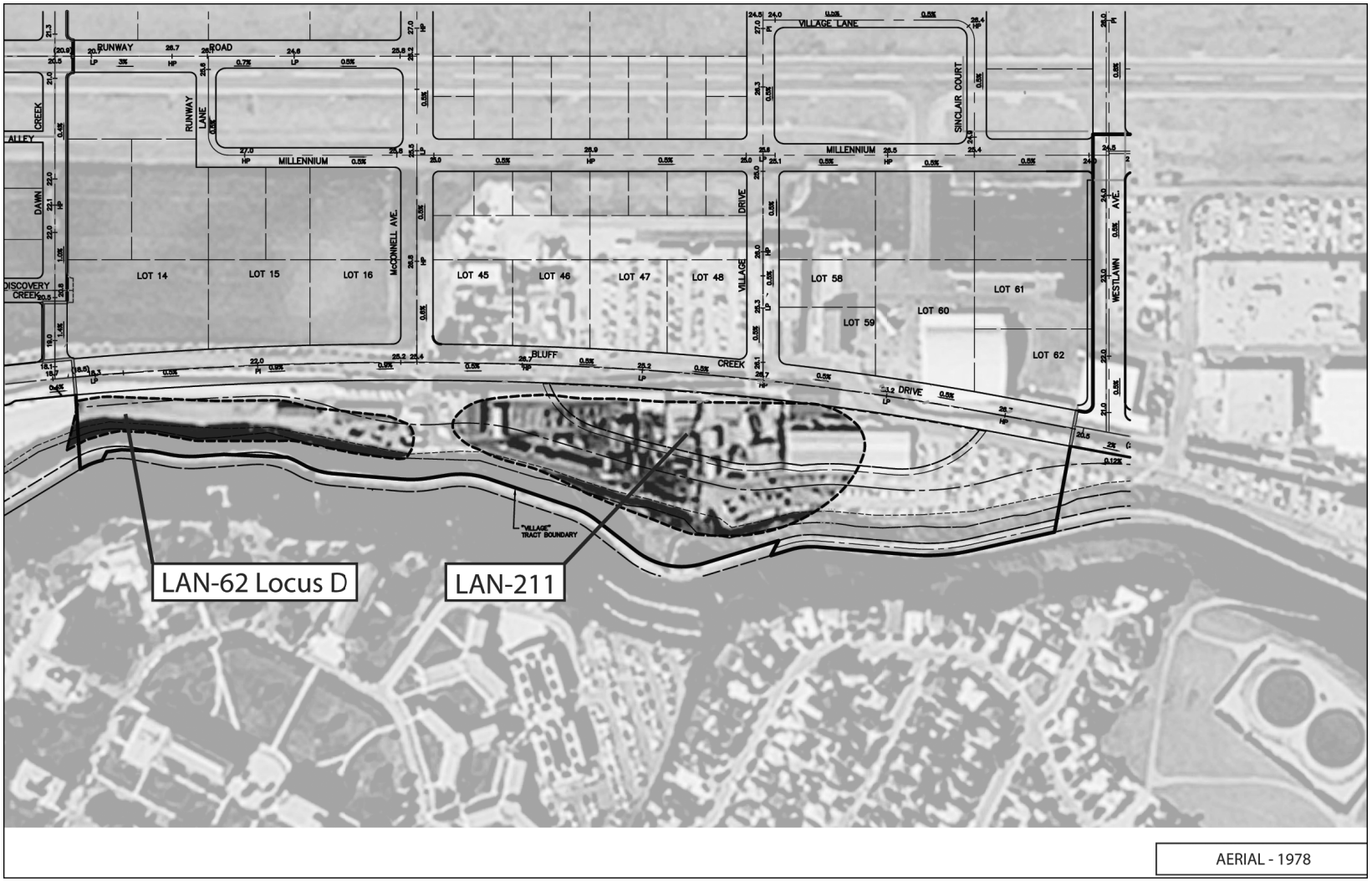


Figure 4. Aerial plan-view photograph of the Hughes Aircraft Company Culver City Plant (now Playa Vista), dated 1978, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to historical-period and modern buildings.

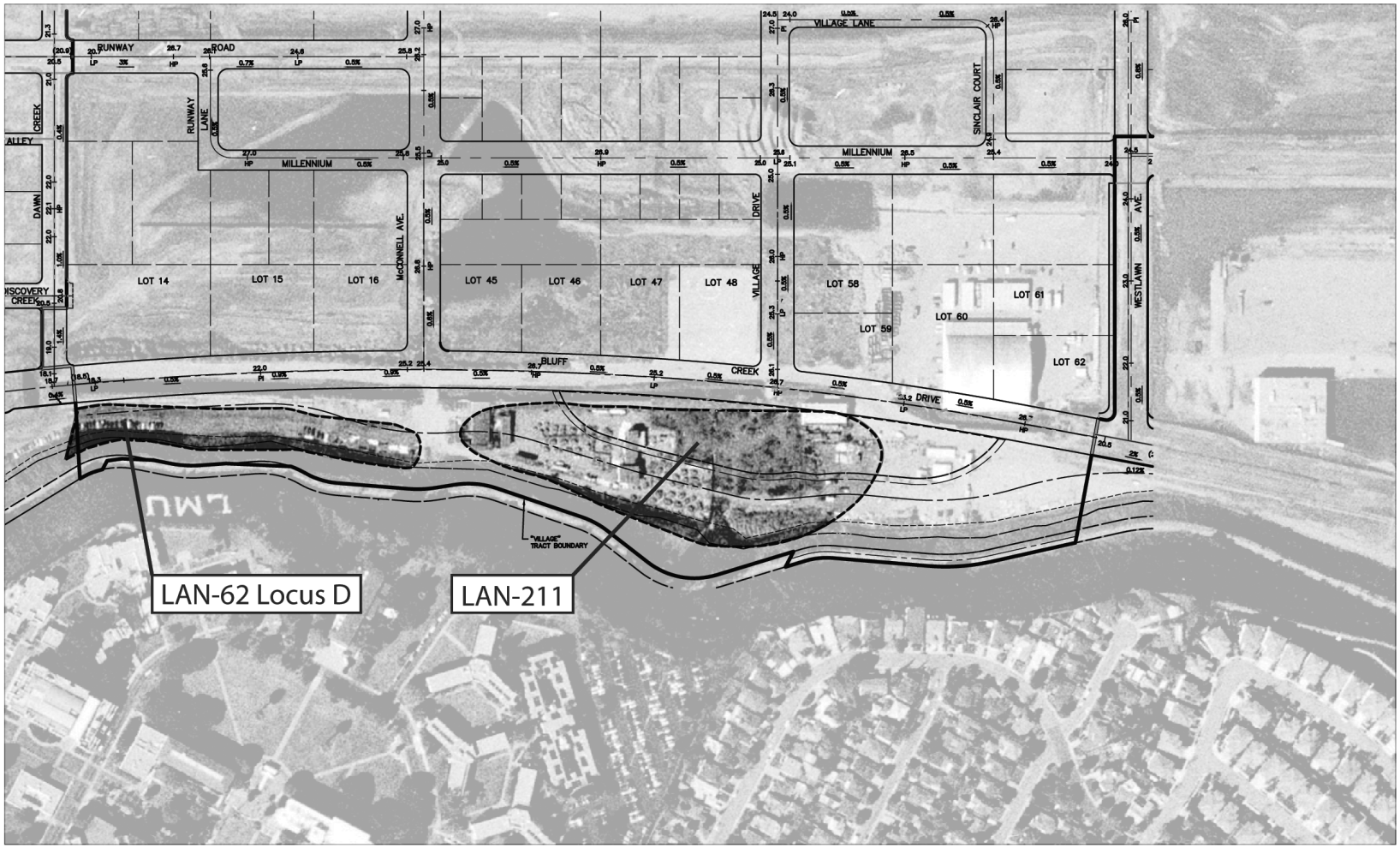


Figure 5. Aerial plan-view photograph of the Proposed Project area, dated 2002, showing the locations of CA-LAN-62 Locus D and CA-LAN-211/H in relation to Hughes Aircraft Company–era historical-period and modern buildings.

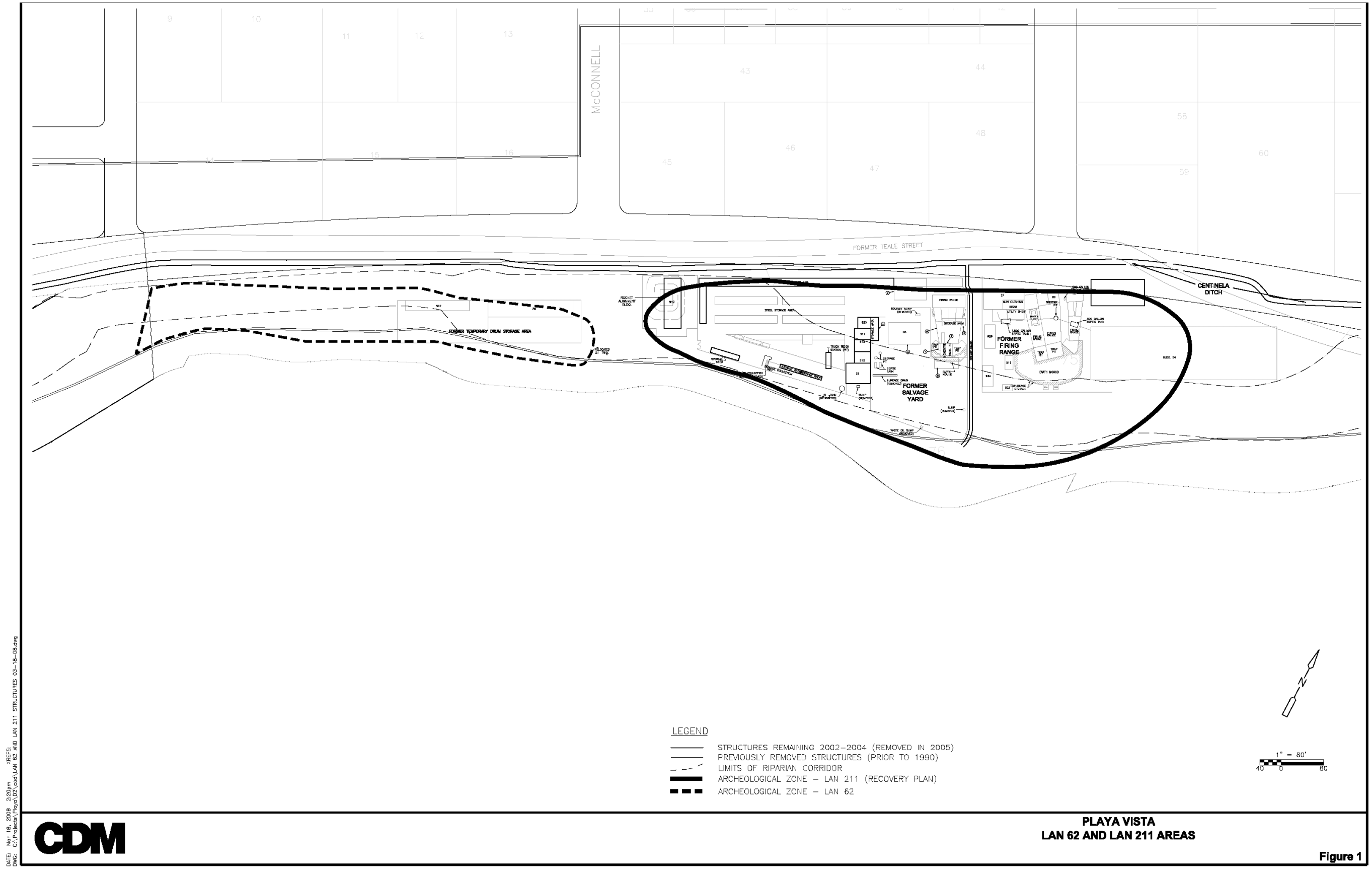


Figure 6. Map of the Proposed Project area, dated 2003, showing existing structures and study areas located within the Proposed Project Site in relation to the locations of CA-LAN-62 Locus D and CA-LAN-211/H.

compounds (VOCs), total petroleum hydrocarbons (TPH), and low levels of metals were found in soils in much of the area. Chemicals were found to extend from the surface down to the water table beneath the leakage collection tray and sump, with subsequent migration occurring laterally to the north of the leakage collection area.

- Centinela Ditch: The channelized Centinela Ditch was a drainage ditch constructed during the Hughes era for flood control. Between 1997 and 2001, a study of sediments from this ditch determined that cadmium, lead, and polychlorinated biphenyl were present.

The historical-period and more modern construction by Hughes impacted the Sites. Foundations of buildings, underground sumps and other subsurface collection systems, underground fuel tanks, grading for the construction of buildings and paved areas, paving of areas, and other construction all caused damage to the Sites. As shown in Figure 7, over 40 percent of the area within the boundaries of the Sites was paved, and almost 60 percent of LAN-211 was paved in 2002. An intact archaeological site was found directly underneath Hughes-era buildings on the west end of LAN-211, and there is no doubt that in these areas the upper portions of the site were damaged by these Hughes-era structures and activities. Archaeological testing at LAN-211 confirmed Hughes-era disturbance (Altschul et al. 2003:120). Within the boundaries of LAN-62 Locus D, mechanical trenching during archaeological testing confirmed that Hughes-era grading in this area removed portions of the site and then later reused the same site material as fill (Altschul et al. 2003:112).

Regulatory Framework Required Archaeological Analysis of LAN-62 Locus D and LAN-211

In connection with the development of the proposed Freshwater Wetland System at Playa Vista, which included the development of the Riparian Corridor, Playa Vista obtained a permit in 1992 from the U.S. Army Corps of Engineers (Corps) under Section 404 of the Clean Water Act. The 404 permit covered the fill of isolated and degraded wetlands across what is now the entirety of the Playa Vista property (Area D, which includes both the First Phase and Proposed Project), as well as other areas which have now been conveyed to the State of California for preservation as open space.

The 404 permit requires the Corps to comply with Section 106 of the National Historic Preservation Act (NHPA), as amended. Under Section 106, as implemented by federal regulations, the Corps is required to take into account the effect of the proposed undertaking as permitted by the 404 permit on archaeological resources included in or eligible for listing in the National Register of Historic Places (NRHP). Thus, the first step taken to comply with Section 106 is to identify those archaeological resources within the Playa Vista property. The second step is to evaluate the significance of the archaeological resources to determine whether they are historic properties—that is, NRHP eligible. To complete the required evaluation, the criteria for inclusion in the NRHP are specified, a plan of work outlining the necessary steps and research goals of the testing is implemented, and test excavations and analyses are carried out. The properties are then recommended as either eligible or not eligible for listing in the NRHP. The effects of the project on the significant resources—archaeological properties—are assessed and mitigation measures selected and implemented to resolve any adverse effects.

For the Playa Vista project, in 1991 a Programmatic Agreement (PA) was entered into by the Corps, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation. Two organizations representing the Gabrielino/Tongva Native American community and the applicant signed the PA as concurring parties. This PA was extended in 2001 to expire in 2011. The PA outlined a review process specific to Playa Vista to ensure that the requirements for Section 106 compliance are clear. Archaeological Treatment Plans (ATPs) for archaeological sites at Playa Vista have been prepared

and approved by the Corps, including ATPs for LAN-62 Locus D (Altschul 1991) and LAN-211 (Altschul et al. 2003).

For the specific cases of LAN-62 Locus D and LAN-211, the ATPs were created for the construction of the Riparian Corridor through the Sites at the base of the bluff. Even if the Riparian Corridor would have been designed to avoid the Sites, compliance under Section 106 requires identification and evaluation of historic resources on the property. To design the Riparian Corridor to avoid these Sites, archaeological testing and ATPs would have been required to evaluate the boundaries of the Sites, even if the purpose was to avoid them during construction. The removal of asphalt, buildings, and other constructions on the Proposed Project area would have undoubtedly had an effect on the Sites, also requiring evaluation of the historic resources.

Archaeological Work at LAN-62 Locus D and LAN-211

In November of 2002, the Proposed Project area was known to contain one archaeological site determined as eligible for listing in the NRHP: LAN-62 Locus D. The ATP for LAN-62 Locus D is the data recovery plan that recommended the site as eligible for listing in 1991 and was approved by the Corps and the other signatories to the PA (Altschul 1991). At the time it was approved, the site was determined as eligible for listing in the NRHP. In November of 2002, the Proposed Project area was also known to contain one archaeological site recommended as eligible for listing in the NRHP. The ATP for LAN-211, which recommended the archaeological site as eligible for listing in the NRHP, is included in *At the Base of the Bluff*. This ATP was approved by the Corps and the other signatories to the PA (Altschul et al. 2003).

SRI undertook archaeological data recovery work at LAN-62 Locus D and LAN-211 between September 9 and December 9, 2005. Prior to data recovery excavations, SRI monitored the removal of Hughes-era (and earlier) artificial fill at the Sites, and also monitored the removal of buildings overlying LAN-211. This fill was the result of both the construction of Cabora Road and its associated sewer in the early twentieth century by the City of Los Angeles, located on the bluff slope above the Sites, as well as grading on top of the Sites during the Hughes era. The construction of Cabora Road and the associated sewer deposited a large amount of fill on the bluff slope below the road, burying portions of the Sites beneath an artificial bluff slope. Field efforts were successful at both Sites in collecting a wide range of data relevant to the research questions detailed in the ATPs.

Data recovery methods varied at both Sites. SRI monitored demolition of buildings and removal of fill with heavy machinery. SRI also directed mechanical trenching, manual excavations, and mechanical stripping.

At LAN-211, archaeological deposits were identified directly underneath the footprints of Hughes Aircraft Company–era buildings and directly under asphalt in the western portion of the site. SRI's excavations at LAN-211 revealed a thick, mostly intact archaeological midden deposit, which consists of dark, organic soil containing a variety of artifacts related to everyday prehistoric life. This prehistoric midden deposit, consisting of prehistoric artifacts such as shell, animal bone, stone tools, and fire-affected rock, also contained a number of features (clusters of artifacts directly related to specific activities). These recovered artifacts are analytically helpful in addressing important research issues for both the prehistoric and historical-period occupations in the Ballona. At LAN-211, SRI identified a total of 51 features. Of the 51 features, there were 3 features containing isolated human burial features. In addition, SRI found 8 instances of isolated human bones (which may be related to the 3 isolated burial features). All of these finds, including features associated with everyday life, as well as isolated human burials, are commonly found at prehistoric sites across southern California.

At LAN-62 Locus D, the results of these efforts included the identification and documentation of three features. The archaeological deposit at LAN-62 Locus D was very sparse compared to LAN-211, showed significant signs of disturbance, and appeared to have much less potential for contributing significantly to

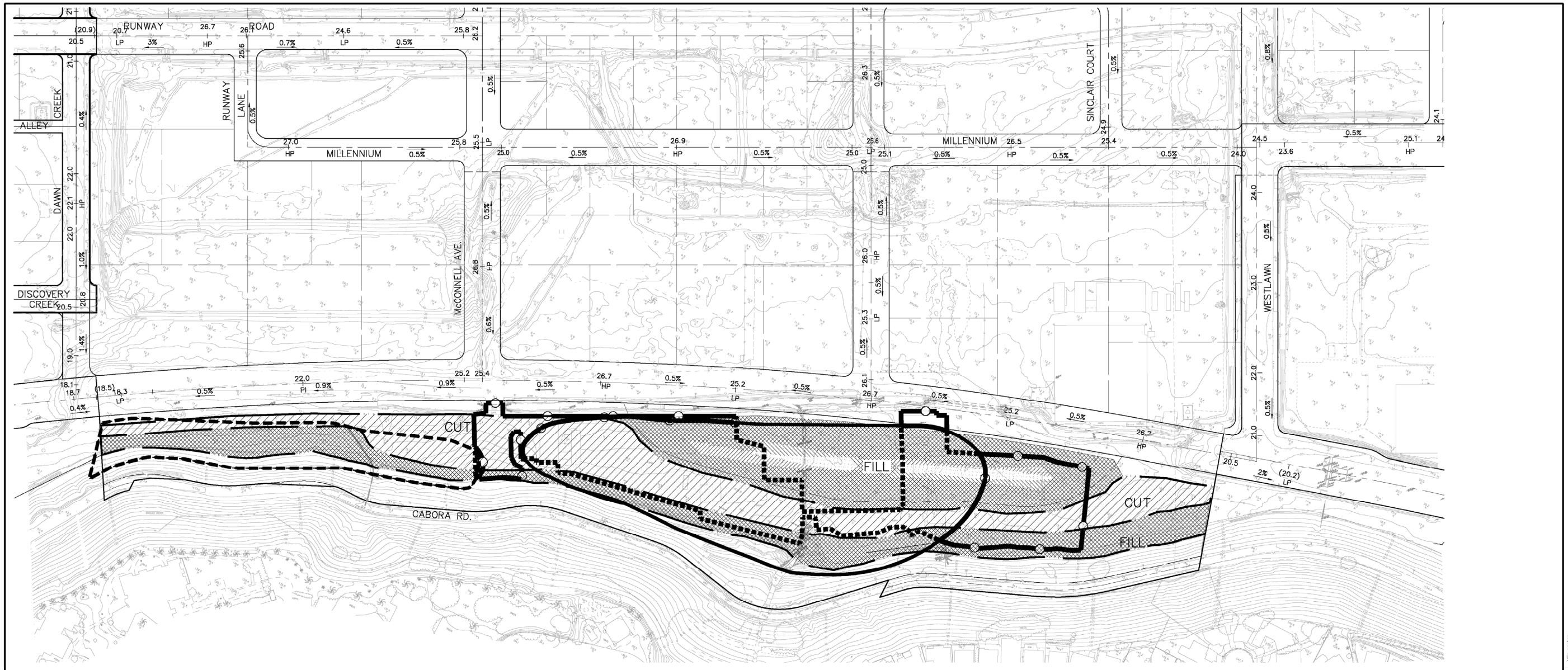


Table 1 – Cut/Fill Percentage Area

	Archeological Zone LAN 62	Archeological Zone LAN 211 (Recovery Plan)
Cut Area	28%	32%
Fill Area	46%	62%
Untouched Area	26%	6%
Total	100%	100%
Preserved in Place	**72%**	**68%**

Table 2 – Paved & Unpaved Surfaces within LAN62 & LAN211 (Recovery Plan)

	SF	%
Paved Area	140,610	43%
Unpaved Area	188,774	57%
Total	329,384	100%

Table 3 – Paved & Unpaved Surfaces within LAN211 (Recovery Plan)

	SF	%
Paved Area	140,320	57%
Unpaved Area	107,934	43%
Total	248,254	100%

LEGEND

- PAVED AREA OUTSIDE ARCHEOLOGICAL ZONE
- PAVED AREA WITHIN ARCHEOLOGICAL ZONE
- CUT AND FILL LIMIT
- ARCHEOLOGICAL ZONE – LAN 62
- ARCHEOLOGICAL ZONE – LAN 211 (RECOVERY PLAN)
- FILL
- CUT

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

PLAYA CAPITAL COMPANY, LLC

PSOMAS

DATE: 01/08/08 REVISED ON: 02/25/08
JOB No:1PCC0701.24
SHEET 2 OF 2

Figure 7. Psomas map of the Proposed Project area, illustrating the cut and fill areas associated with the construction of the Riparian Corridor and Hughes Aircraft Company–era paved areas overlaid with the archaeological site boundaries of CA-LAN-62 Locus D and CA-LAN-211/H.

an understanding of prehistory in the Ballona Lagoon area. As discussed above, much of LAN-62 Locus D appears to have been removed in the Hughes era during grading.

At the end of data-recovery excavations and the end of subsequent construction of the Riparian Corridor, based upon the archaeological site boundaries estimated in the ATPs for LAN-62 Locus D and LAN-211 (Altschul et al. 2003), approximately 46 percent of the aerial extant of LAN-62 Locus D and approximately 62 percent of the aerial extant of LAN-211 remained covered in fill, rather than removed during construction of the Riparian Corridor. In addition, approximately 26 percent of the aerial extant of LAN 62 and 6 percent of the aerial extant of LAN-211 were not graded at all. Given the likely depth of the Sites, the total volume of the Sites retained intact is probably significantly higher (that is, only the upper surface of the Sites was removed by construction). As a result, approximately 72 percent of LAN-62 and 68 percent of LAN-211 remain preserved in place under fill or left undisturbed (see Figure 7).

A preliminary report on findings from these excavations was presented and approved by the Corps (Van Galder et al. 2006) and is attached as Appendix A.

Archaeological Boundaries Known in November 2002 and September 2004

SRI's understanding of the archaeological boundaries of LAN-62 Locus D and LAN-211 in November 2002 was limited and was based upon archaeological boundary testing and evaluation conducted in 1999 and 2001 and prior archaeological monitoring. These data, including maps, were presented in *At the Base of the Bluff* (Altschul et al. 2003). SRI's understanding remained the same in September of 2004.

In November 2002 and September 2004, both LAN-62 Locus D and LAN-211 had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and sewer line in the bluff area. The eastern, southern, and northern boundaries of LAN-211 and the northern and southern boundaries of LAN-62 Locus D were not precisely known. Previous bucket auger data and mechanical trenching provided general boundaries for the Sites. In the case of LAN-211, the northern boundary of the site was unclear as testing had not been done underneath then-existing Teale Street. The eastern boundary of the site was unclear because of former Hughes plant site industrial usage. The southern boundary of the site was unclear because the site extends into the manufactured bluff slope for an unknown distance. In the case of LAN-62 Locus D, the northern boundary was unclear because testing had not been conducted underneath then-existing Teale Street. The southern boundary of the site was unclear because, like LAN-211, the site extends into the bluff slope for an unknown distance. The western boundary of LAN-62 Locus D is the border between the Proposed Project and the eastern boundary of the First Phase residential project. There was a small gap between the eastern boundary of LAN-62 Locus D and the western boundary of LAN-211, identified during trenching in 2001.

Archaeological Boundaries Known in September 2007

SRI's current understanding of the archaeological boundaries of LAN-62 Locus D and LAN-211 is based upon the data recovery excavations on the Sites in the fall of 2005, archaeological monitoring of building removal in the late summer of 2005, and prior archaeological monitoring in the area. These data, including maps, were presented in the preliminary report on data recovery on these Sites (Van Galder et al. 2006). During data recovery, portions of both Sites had been hand excavated and the rest of the site within the bottom of the corridor was removed through monitored mechanical stripping to the level of the water table. The water table was relatively close to the surface, and a portion of the archaeological site was located below the water table. Because natural water tables in the area have changed over thousands of years, portions of the site that originally were not below the water table currently are underwater.

At LAN-62 Locus D, archaeological site material was not identified in the bottom of the corridor, only on the bluff slope. It is possible that there may be archaeological site material below the base of the corridor,

or it may extend further to the north. As pointed out above, archaeological resources are generally very sparse at LAN-62 Locus D, in comparison to LAN-211.

In the case of LAN-211, site material within the bottom of the Riparian Corridor was only mechanically stripped to slightly above the water table. Below this point, the archaeological site is intact in places within the site boundaries. It is unclear how thick the archaeological deposit is below the current water table, but based on limited hand-auger samples, it may measure approximately 1 m thick.

Based upon this data recovery work in 2005, site boundaries at both Sites are clearer, especially within the existing Riparian Corridor. In the case of LAN-211, the eastern boundary was much better understood based upon monitoring of mechanical stripping of fill overlying the deposit in the Riparian Corridor. The northern boundary of LAN-62 Locus D became clearer, but the northern boundary of LAN-211 is not as clear. However, the southern boundaries of both LAN-62 Locus D and LAN-211 are still not well understood, as the southern margins of both Sites go into the bluff slope for an unknown distance.

Any Construction within the Boundaries of the Sites Would Likely Impact Archaeological Resources

As noted previously, the area encompassing LAN-62 Locus D and LAN-211 is and has been extensively developed over a number of decades as part of the Hughes plant site. As a result of the industrial use of the Sites, the Proposed Project area required demolition of the existing structures, removal of the cracking and deteriorating asphalt, and removal of building subsystems and other underground infrastructure (pipes, tanks, etc.).

In addition, the Proposed Project area was known to contain both soil and groundwater contamination that would require excavation of soil from the Sites.

As a result, demolition of the existing structures, removal of the asphalt, removal of substructures, and implementation of contamination remediation likely would have impacted the then-existing archaeological resources and would have required development and implementation of a data recovery plan to assess and analyze the archaeological resources known to be present in the Sites. As noted above, portions of both Sites were identified very close to the surface. As a result, any surface disturbance would have created an impact to the Sites.

Relocation of the Riparian Corridor

The relocation of the Riparian Corridor might create a number of new impacts that relate to all of the options proposed by Psomas. These possible new impacts relate to all of the options and are not repeated in the discussion of each option.

Filling of the Existing Riparian Corridor

In connection with the “preservation in place” of the then-existing archaeological resources (i.e., 2002 or 2004), it has been suggested that the archaeological resources that have been obtained through the data recovery program be returned to the Riparian Corridor site and the area refilled and the Riparian Corridor relocated outside of the boundaries of LAN-62 Locus D and LAN-211.

Setting aside the issues of the possible locations of a relocated Riparian Corridor, it is important to note that the "return" of archaeological resources to the Riparian Corridor would not eliminate the changes to the archaeological resource that have occurred by virtue of the construction of the Riparian Corridor.

Replacement of Artifacts at the Sites

If any of the options to relocate the Riparian Corridor were to be implemented, the Riparian Corridor in the area between and within LAN-211 and LAN-62 Locus D would be filled with new fill material to pre-construction grade. It is possible that in connection with the fill of new material that the archaeological material previously excavated in the fall of 2005 would be included in the fill. As discussed above, the archaeological material recovered at LAN-62 Locus D and LAN-211 consists of artifacts recovered from the prehistoric midden at both Sites, which includes artifact classes such as shell, animal bone, stone tools, fire-affected rock, and other materials associated with everyday life in prehistory, as well as the three isolated burial features and isolated bone fragments.

Returning the artifacts from the Sites to where they were found would not erase the fact that they were removed during the data recovery excavations in 2005. By definition, archaeological field techniques impact historic resources, as the artifacts are removed from the context in which they are found. However, these "impacts" by definition are mitigated by the archaeological process of recordation and analysis. By conducting archaeological data recovery excavations and recording in precise detail the location of objects both relative to other artifacts as well as within the resource as a whole, it is possible to answer research questions. These artifacts found in their prehistoric association tell a great deal about past behaviors. When artifacts are removed from the context in which they are found, it is impossible to replace them in such a way as to reconstruct the human behavior that formed the site (Schiffer 1987:16–21). Artifacts, human remains, and soil associated with human remains have been collected and retained in secure facilities at Playa Vista; all other soil and site sediment has been redeposited as fill elsewhere at Playa Vista.

Eligibility for listing in the NRHP is greatly affected by disturbance from excavation or other significant human activity. Both LAN-62 and LAN-211 were recommended as eligible for listing in the NRHP in part due to the context and integrity of association of the Sites. As is pointed out in *National Register Bulletin 36* (National Park Service [NPS] 2000:35), although the evaluation of integrity can be subjective, it is directly related to a site's significance: does the site have enough integrity to convey its significance? Integrity of association is based upon whether there are sufficient data to address research questions posed in a historic context or research design (NPS 1997:46, 2000:42). Replacing previously excavated remains alters a site's integrity of association, associated significance, and, consequently, its eligibility for listing in the NRHP. For example, the integrity of a site can be significantly altered by mechanical or other human disturbance. A site which has had several superimposed components mixed due to plowing, for example, cannot be eligible if the research design calls for study of artifacts from a specific component (NPS 1997:23). Furthermore, it is argued in *National Register Bulletin 15* that a "reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural material or context or both have been lost" (NPS 1997:23). In these examples, the position put forth in the National Register bulletins is that mixed or redeposited contexts do not have sufficient integrity of association and that those deposits would not be eligible for listing in the NRHP. Therefore, a logical conclusion is that replacement of archaeological material where it was once found is not adequate mitigation. Once artifacts are removed through archaeological techniques, mitigation under the PA and ATPs requires analysis, report writing, curation of certain artifacts, and reinterment of human remains and associated grave goods.

Failure to Curate Artifacts

The replacement and reburial of archaeological artifacts within respective site boundaries, rather than curating them at a facility meeting federal standards, would have implications for the PA and the ATPs approved by the Corps. The ATPs for both LAN-62 (Altschul 1991:7) and LAN-211 (Altschul et al.

2003:279) provide for curation of all materials and records at a repository meeting federal standards. Furthermore, Stipulation 3b of the PA provides in part that

> The Parties to this agreement accept the terms of the Phase 1 ATP, entitled *Data Recovery Plan for CA-LAn-62 and CA-LAn-211, Playa Vista Archaeological Project* (Attachment 1) as a means to take into account the effects of construction of that phase of the project on historic properties.

Stipulation 6 of the PA goes further and states clearly that

> The Corps shall ensure that all materials and records resulting from implementation of this agreement are curated in accordance with 36 CFR Part 79.

The replacement of previously excavated artifacts within the boundaries of the historic resource, rather than at a curation facility meeting federal standards, would not be in compliance with the PA or ATPs. Moreover, data recovery and curation are the essential mitigation that is required under the PA and ATPs for an impacted archaeological site. Without curation, the archaeological resource would be impacted without required federal mitigation.

Removal of the Riparian Corridor

If the Riparian Corridor were removed and filled, it is probable that altering the side walls or bottom of the Riparian Corridor would be necessary. If this is the case, it is possible that there would be impacts to both Sites along the southern wall of the Riparian Corridor, as the Sites are preserved going into the bluff slope for an unknown distance and along the northern side and bottom of the Riparian Corridor at LAN-211, where there is intact site. Therefore, by removing and filling the Riparian Corridor along the Sites, it is possible that there would be impacts to both Sites that would need to be mitigated.

Removal of Standing Buildings at LAN-211

As of 2002 and 2004, a number of buildings and structures existed in LAN-211. The foundations, footings, substructures, and surrounding asphalt overlying LAN-211 would have needed to be left in place in order to not impact LAN-211. It is unlikely that these facilities and structures could have been left in place due to their deteriorating conditions. Virtually any use of the Sites (including a park) would have required removal of the buildings, foundations, asphalt, and substructures. In addition, soil remediation of the Sites was required. The removal of asphalt and building foundations and remediation of the Sites due to the soil and groundwater contamination would likely have impacted LAN-211, as data collected in 2005 demonstrated that there were intact archaeological deposits directly below the modern Hughes-era constructions. Therefore, it is likely that all options would have been impacted and the data recovery plans implemented.

Ponding of Water Atop Archaeological Sites

Several of the options presented would have allowed ponding of water atop LAN-62 Locus D and LAN-211. Much of this water would originate from runoff from above Playa Vista at Loyola Marymount University (LMU), run down the bluff slope, and sit atop the two archaeological sites. Ponding would have had potential effects on the preservation of in situ artifacts. Any option that created ponding on the archaeological sites would have impacted them.

In addition, construction of systems to capture or convey water across the archaeological sites likely would have impacted them.

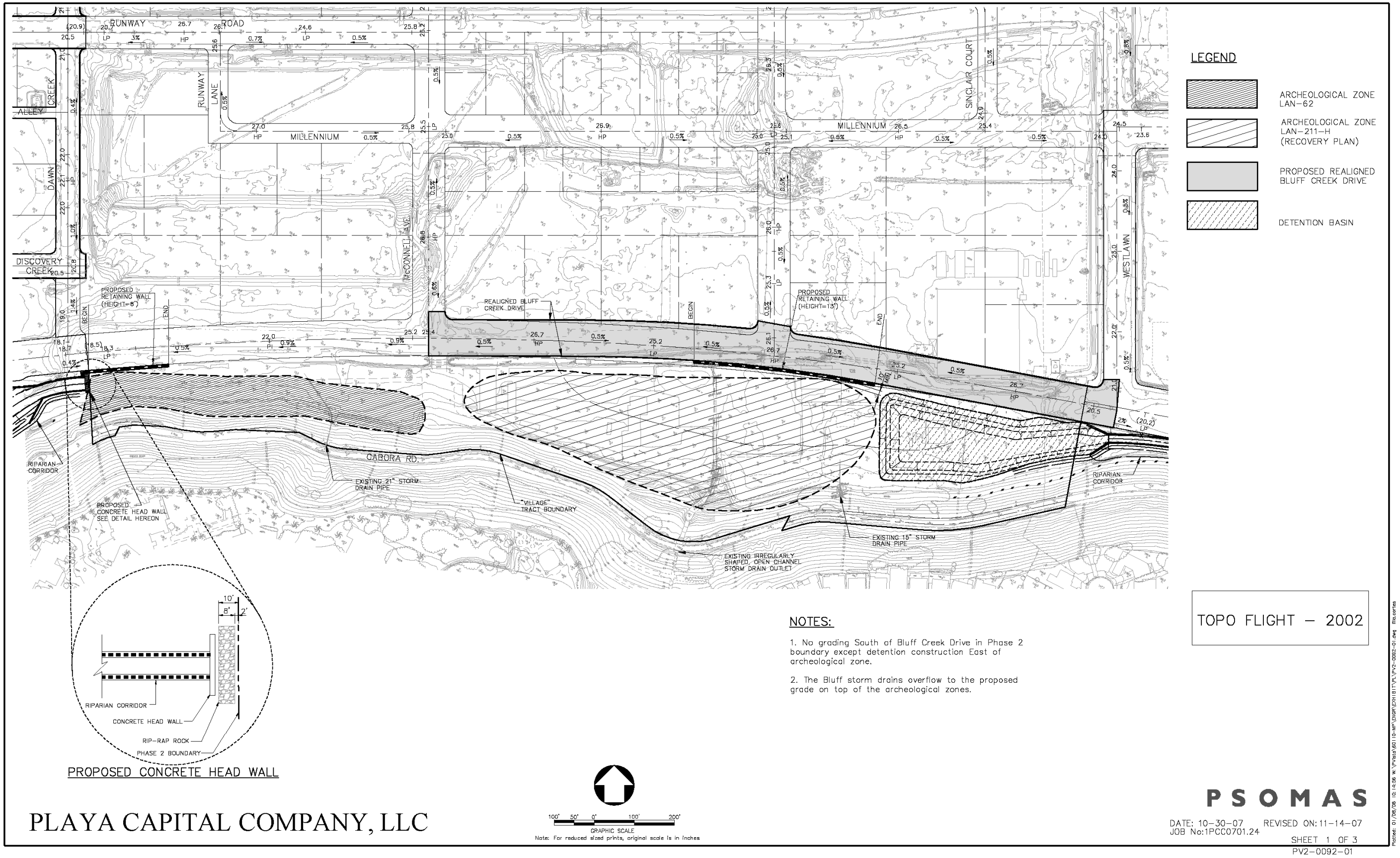


Figure 8. Map of Option 1: No Riparian Corridor.

Option 1

Implications for Archaeology as of November 2002 and September 2004

In November 2002 and September 2004, both Sites had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and a sewer line in the bluff area. The proposed Option 1 would have essentially allowed water from the eastern half of the Playa Vista First Phase riparian corridor to flow across the Sites to the western portion of the riparian corridor located in the First Phase (Figure 8). Bluff Creek Drive would have been realigned to the north. The flow of water over the Sites during storms or high water flow in the east end of the Riparian Corridor or from existingdrainage structures on the Bluffs above the Sites would have resulted in a strong potential for erosion of the Sites, which would have had negative impacts on the archaeological resources. In addition, ponding water might have impacted the Sites.

Given that the exact boundaries of LAN-211 were unknown during these time periods, archaeological boundary testing would have been required to determine if construction would occur within the site boundaries.

Finally, it is possible that the realignment of Bluff Creek Drive might have impacted the northeastern edge of LAN-211. Additional archaeological boundary testing might have been necessary to ensure that the site was not impacted by Bluff Creek Drive construction.

Implications for Archaeology as of September 2007

Portions of LAN-62 Locus D and LAN-211 are still intact. Water flow from the Riparian Corridor in the eastern portion of the First Phase Project or existing drainage structures on the Bluffs above the Sites might have eroded the remaining intact portions of the Sites (including the southern boundaries) and have had negative impacts on the resources. In addition, ponding water might have impacted the remaining portions of the Sites.

The now-existing Riparian Corridor in the Proposed Project area would be filled, and Bluff Creek Drive would be realigned to the north. It is possible that the realignment of Bluff Creek Drive might impact the northeastern edge of LAN-211. Additional archaeological boundary testing would be necessary to ensure that the site would not be impacted by Bluff Creek Drive construction.

Option 2

Implications for Archaeology as of November 2002 and September 2004

In November 2002 and September 2004, both Sites had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and a sewer line in the bluff area. Option 2 would have rerouted the water flow around the Sites by installing a large culvert box structure (up to approximately 6 feet tall by 15 feet wide) under portions of the existing Bluff Creek Drive to carry water from the eastern half of the Playa Vista First Phase riparian corridor to the western portion of the riparian corridor located in the First Phase (Figure 9). Bluff Creek Drive would have been realigned to the north. This option appears to avoid the Sites. However, it is possible that additional boundary testing along the northern edge of LAN-211 and the northwest edge of LAN-62 Locus D would have been necessary, due to the realignment of

Bluff Creek Drive and the unknown depth of the concrete box culvert. For there not to have been an impact, the culvert and its constructs must stay outside of the Sites.

Given that the exact boundaries of LAN-211 were unknown during these time periods, archaeological boundary testing would have been required to determine if construction would occur within the site boundaries.

If the above-ground swales required removal of the existing pavement or any ground-disturbing activities, it might have impacted the Sites. Ponding water from the Bluffs into the Sites, where water is currently captured by the existing Riparian Corridor, also might have impacted the Sites.

Implications for Archaeology as of September 2007

As of September 2007, portions of the Sites are still intact. This option appears to avoid the Sites. However, it is possible that additional boundary testing along the northern edge of LAN-211 and the northwest edge of LAN-62 Locus D might be necessary due to the realignment of Bluff Creek Drive and the unknown depth of the concrete box culvert. For there not to be an impact, the culvert and its constructs must stay outside of the archaeological Sites.

If the above-ground swales require ground-disturbing activities within the southern archaeological site boundaries along the bluffs (which are intact), these might impact the Sites. Ponding water also might impact the Sites.

Option 3

Implications for Archaeology as of November 2002 and September 2004

In November 2002 and September 2004, both Sites had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and a sewer line in the bluff area. Option 3 would have rerouted the water flow around the Sites by constructing a new corridor to the north. By doing so, this new corridor would have carried water from the eastern half of the Playa Vista First Phase riparian corridor to the western portion of the riparian corridor located in the First Phase (Figure 10). As part of this construction, the existing Bluff Creek Drive would have been rerouted further north, around the new corridor. The construction of the Riparian Corridor in this option would likely have had limited or no impact to the Sites. However, as the northern boundaries of both Sites and the eastern boundary of LAN-211 were not clearly understood, SRI would have recommended archaeological boundary testing in these areas to confirm the Sites would not have been impacted.

If the above-ground swales required removal of the existing pavement or any ground-disturbing activities, it might have impacted the Sites. Ponding water also might have impacted the Sites.

Implications for Archaeology as of September 2007

As of September 2007, portions of the Sites are still intact. The construction of the Riparian Corridor in this option would likely have had limited or no impact to the Sites. SRI would have recommended archaeological boundary testing along the northern boundaries of both Sites in these areas to confirm no archaeological site would be impacted.

If the above-ground swales required ground-disturbing activities within the southern archaeological site boundaries along the bluffs (which are intact), these might have impacted the Sites. Ponding water also might have impacted the Sites.

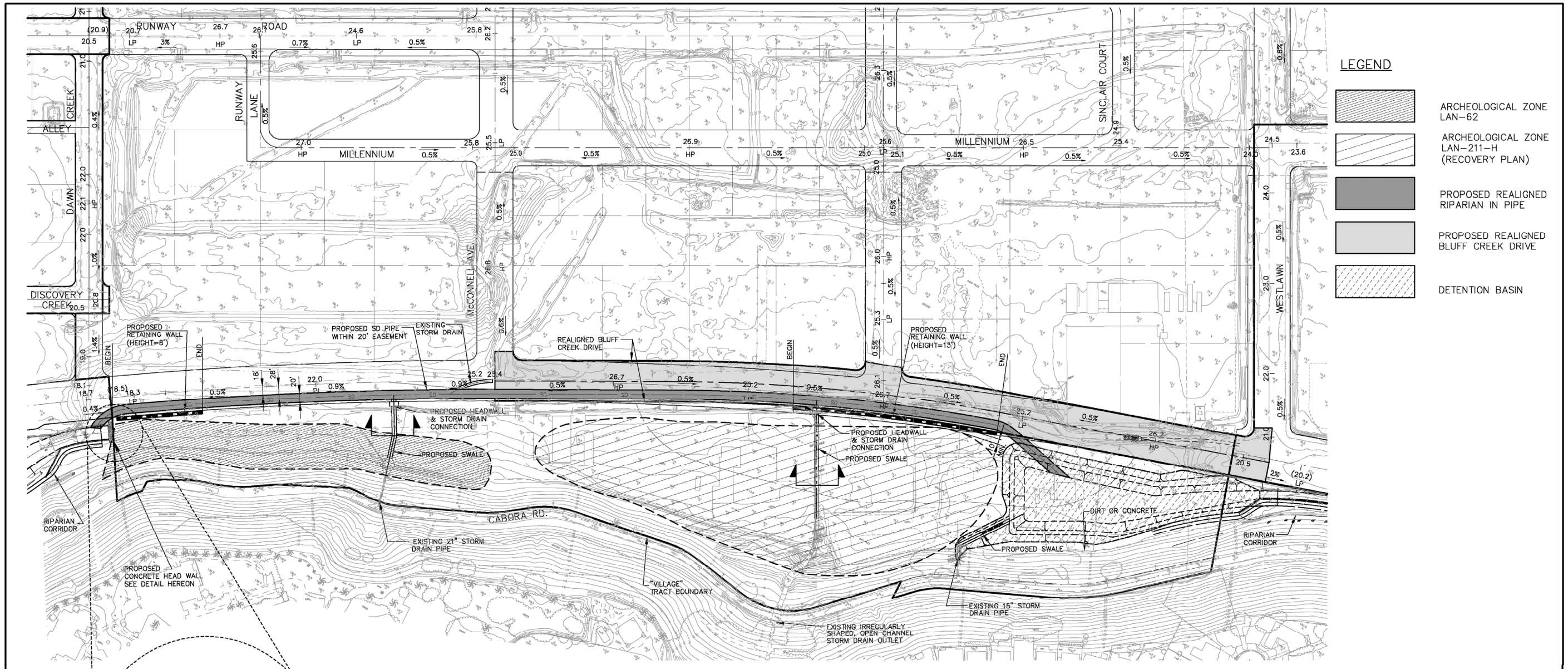
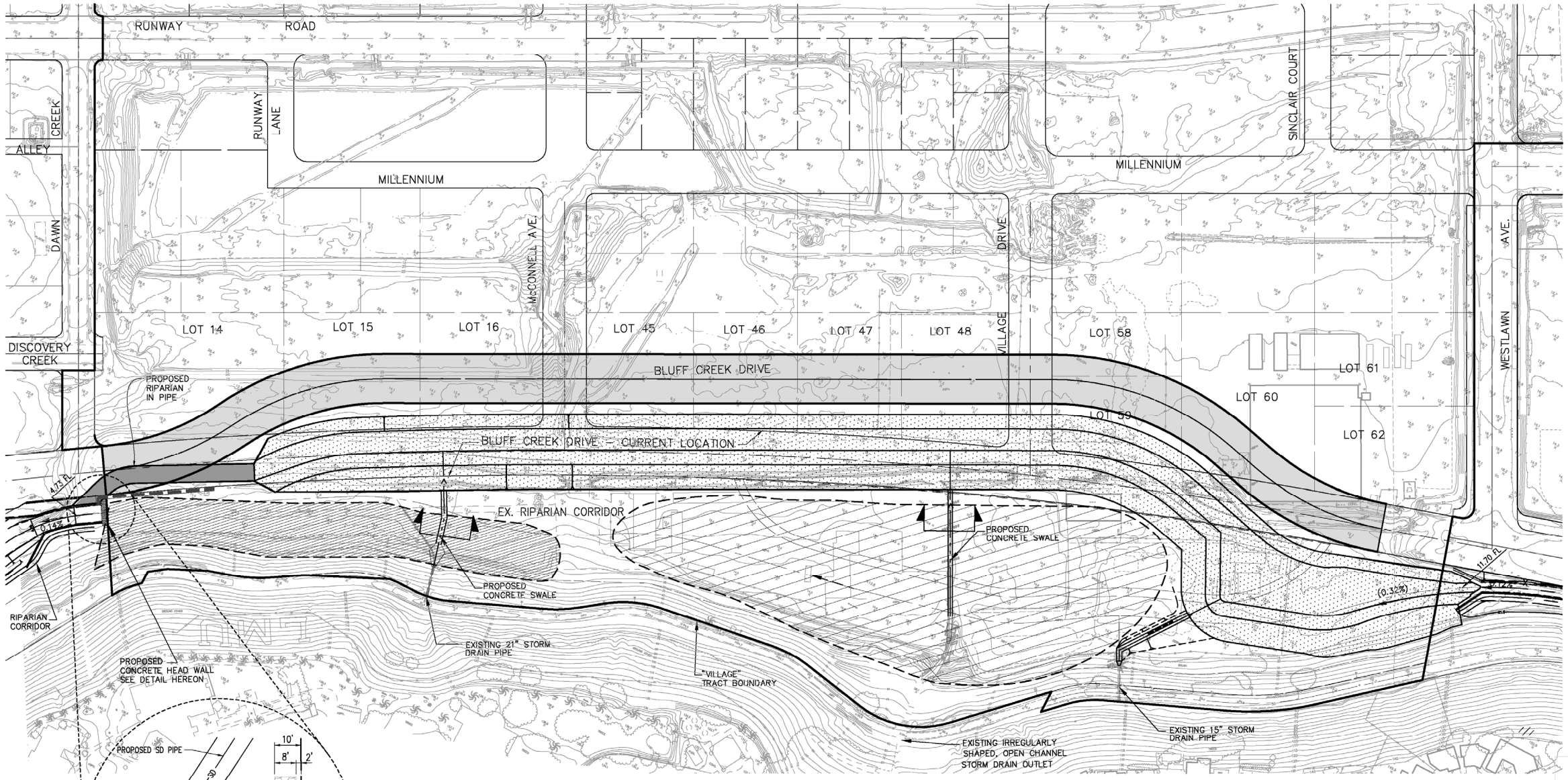


Figure 9. Map of Option 2: No Riparian Corridor with Storm Drain Pipe.



PROPOSED CONCRETE HEAD WALL
NTS

PROPOSED SWALE
NTS

Note: For reduced sized prints, original scale is in inches

LEGEND

- ARCHEOLOGICAL ZONE LAN–62
- ARCHEOLOGICAL ZONE LAN–211–H (RECOVERY PLAN)
- REALIGNED RIPARIAN CORRIDOR
- REALIGNED BLUFF CREEK DRIVE
- PROPOSED REALIGNED RIPARIAN IN PIPE

TABLE 1 – IMPACTED AREAS (SF)

LOT NO.	ORIGINAL	IMPACTED
14	81,817	15,117
15	54,600	33,444
16	47,856	30,457
45	41,794	26,581
46	41,673	26,878
47	43,472	28,637
48	47,584	32,243
58	28,386	551
59	36,977	36,754
60	75,668	22,493
62	53,920	960
TOTAL	553,747	254,115

RIPARIAN AREAS	DESIGN EXISTING (SF)	ALIGNMENT PROPOSED (SF)
RIPARIAN BOTTOM	109,600	109,900
RIPARIAN SLOPES	103,800	119,000
TOTALS	213,400	228,900

NOTES:

1. Bluff Creek Drive and the Riparian corridor are realigned north of the existing alignment as shown in the exhibit.
2. The realignment impacts the lots 14,15,16,45,46,47,48,58,60 and 62.
3. Table 1 summarizes the impacted areas per lot number
4. The realigned corridor does not impact any of the archeological zones.
5. The discharge from existing bluff storm drains will be directed to the realigned corridor through concrete swales.

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Figure 10. Map of Option 3: Realigned Riparian and Bluff Creek Dr. to the North.

Option 4

Implications for Archaeology as of November 2002 and September 2004

In November 2002 and September 2004, both Sites had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and a sewer line in the bluff area. Option 4 would have rerouted the water flow around the existing Sites by constructing a new corridor running north from the eastern end of LAN-211 and then running west along the northern side of Bluff Creek Drive. This construction would have carried water from the eastern half of the Playa Vista First Phase riparian corridor to the western portion of the riparian corridor located in the First Phase (Figure 11). Bluff Creek Drive would have been slightly realigned. The construction of the Riparian Corridor in this option likely would have had no impact on the Sites, as it would have stayed well north of the site boundaries. However, as the eastern boundary of LAN-211 was not clearly understood, SRI would have recommended archaeological boundary evaluation and testing in this area to confirm no archaeological site would have been impacted.

It is possible that the realignment of Bluff Creek Drive might have impacted the northeastern edge of LAN-211. Additional archaeological boundary testing might have been necessary to ensure that the site was not impacted by Bluff Creek Drive construction.

If the above-ground swales required removal of the existing pavement or any ground-disturbing activities, it might have impacted the Sites. Ponding water also might have impacted the Sites.

Implications for Archaeology as of September 2007

As of September 2007, portions of the Sites are still intact. The construction of the riparian corridor in this option appears to have no impact on the Sites, as it stays well north of the site boundaries.

It is possible that the realignment of Bluff Creek Drive might impact the northeastern edge of LAN-211. Additional archaeological boundary testing might have been necessary to ensure that the site would not have been impacted by Bluff Creek Drive construction.

If the above-ground swales required ground-disturbing activities within the southern archaeological site boundaries along the Bluffs (which are intact), these might have impacted the Sites. Ponding water also might have impacted the Sites.

Option 5

Implications for Archaeology as of November 2002 and September 2004

In November 2002 and September 2004, both Sites had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and a sewer line in the bluff area. Option 5 would have rerouted the water flow around the recorded boundaries of the Sites by constructing a new corridor to the south, cut into the bluff slope (Figure 12). This new corridor would have carried water from the eastern half of the Playa Vista First Phase riparian corridor to the western portion of the riparian corridor located in the First Phase. Both Sites are partially covered on their south sides by colluvium resulting from the construction of Cabora Road and the associated sewer. As a result, portions of these Sites extend into the bluff slope for an unknown distance. In the case of LAN-211, portions of the site also are actually on the bluff slope. As a result, SRI would have recommended archaeological boundary evaluation and testing

along the bluff slope in these areas to identify any archaeological site within the boundaries of the proposed corridor. The Sites would have been impacted by this option.

It is possible that the realignment of Bluff Creek Drive might have impacted the northeastern edge of LAN-211. Additional archaeological boundary testing might have been necessary to ensure that the site was not impacted by Bluff Creek Drive construction.

Implications for Archaeology as of September 2007

As of September 2007, portions of the Sites are still intact. The Sites are partially covered on their south sides by colluvium resulting from the construction of Cabora Road and the North Outfall Sewer. As a result, portions of these Sites extend into the bluff slope for an unknown distance. In the case of LAN-211, portions of the site also are actually on the bluff slope. As a result, SRI would recommend archaeological boundary evaluation and testing along the bluff slope in these areas to identify any archaeological site within the boundaries of the proposed corridor. Preserved archaeological site material would be impacted by this option.

It is possible that the realignment of Bluff Creek Drive might impact the northeastern edge of LAN-211. Additional archaeological boundary testing might be necessary to ensure that the site were not impacted by Bluff Creek Drive construction.

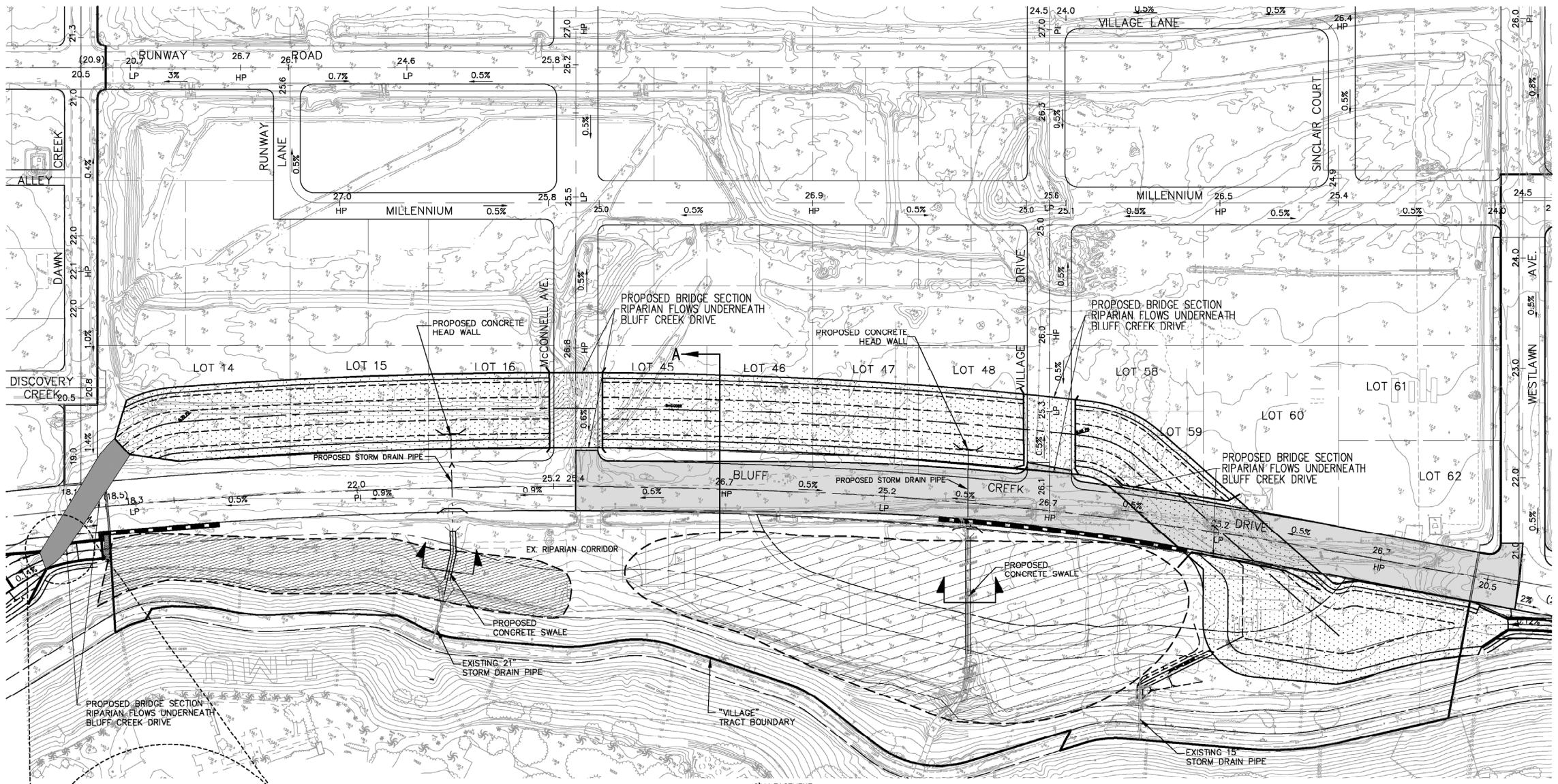
Option 6

Implications for Archaeology as of November 2002 and September 2004

In November 2002 and September 2004, both Sites had not been impacted by any of the Proposed Project development but had previously been impacted by earlier development from the Hughes plant construction and operations and construction of Cabora Road and a sewer line in the bluff area. Option 6 would have rerouted the water flow above the Sites in an attempt to avoid disturbing them. In this option, the corridor would have been constructed with a shallower slope from the east-to-west end of the corridor (Figure 13). This new, shallower corridor would have then carried water from the eastern half of the Playa Vista First Phase riparian corridor to the western half of the riparian corridor located in the First Phase. Even though this option would have created a shallower riparian corridor, archaeological deposits would still have been impacted because the Sites were at the ground surface. It appears that the corridor would have been widened to the north as compared to the Proposed Project's Riparian Corridor. This widening of the corridor likely would have impacted additional portions of LAN-211, as the northern side of the corridor would be further to the north. In addition, grading and other work in the corridor that might have extended deeper to meet City of Los Angeles construction requirements likely would have further damaged the Sites. Finally, the construction of the corridor directly on top of both the Sites, even if it cut less deeply into the Sites, would have resulted in a negative impact on them.

Implications for Archaeology as of September 2007

As of September 2007, portions of the Sites are still intact. The widening of the Riparian Corridor likely would have impacted the remaining northern portion of LAN-211, as the northern side of the corridor would have been further to the north than it is currently. As a result, SRI would have recommended archaeological boundary evaluation and testing along this area to identify the extent of the site boundary within the proposed corridor. Finally, the construction of the corridor directly on top of both the Sites, even if it did not cut into the Sites, would have been a negative impact on them.



LEGEND

- ARCHEOLOGICAL ZONE LAN–62
- ARCHEOLOGICAL ZONE LAN–211–H (RECOVERY PLAN)
- REALIGNED RIPARIAN CORRIDOR
- REALIGNED BLUFF CREEK DRIVE
- PROPOSED REALIGNED RIPARIAN IN PIPE

TABLE 1 – IMPACTED AREAS (SF)

LOT NO.	ORIGINAL	IMPACTED
14	81,817	56,534
15	54,600	40,517
16	47,856	36,534
45	41,794	31,822
46	41,673	30,957
47	43,472	30,994
48	47,584	31,908
58	28,386	1,889
59	36,977	22,702
60	75,814	2,653
TOTAL	629,561	286,510

REALIGNMENT NOTES:

1. Bluff Creek Drive remains in its current location.

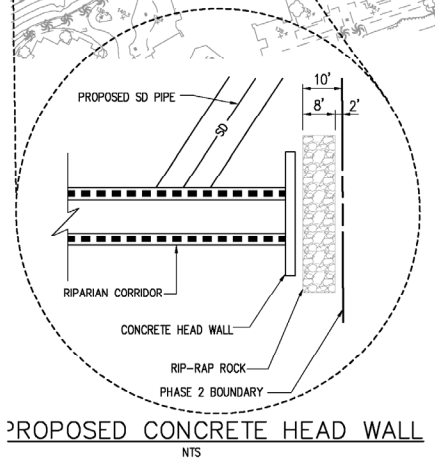
2. The Riparian corridor is realigned north of the existing Bluff Creek Drive as shown in the exhibit.

REALIGNMENT IMPACTS:

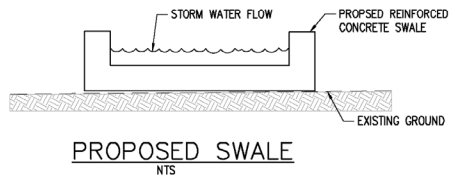
1. The realigned corridor does not impact the archeogalical zones LAN–62 and LAN–211–H

2. The realignment impacts the lots 14, 15, 16, 45, 46, 47, 48, 58 and 59. Table 1 summarizes the impacted areas.

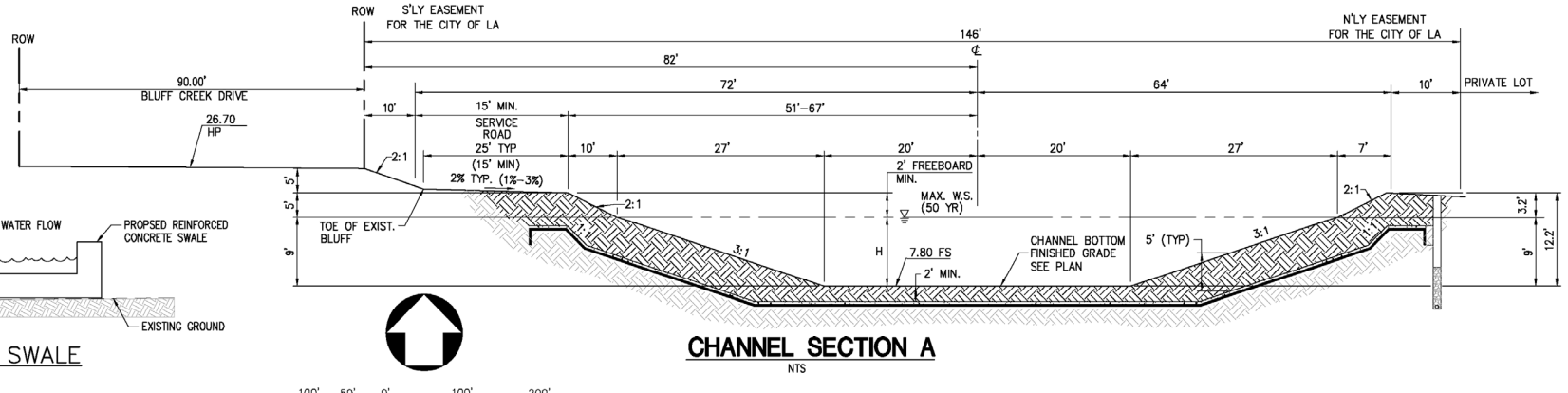
3. Changes to lot configuration are required.



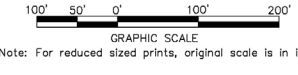
PROPOSED CONCRETE HEAD WALL
NTS



PROPOSED SWALE
NTS



CHANNEL SECTION A
NTS



Note: For reduced sized prints, original scale is in inches

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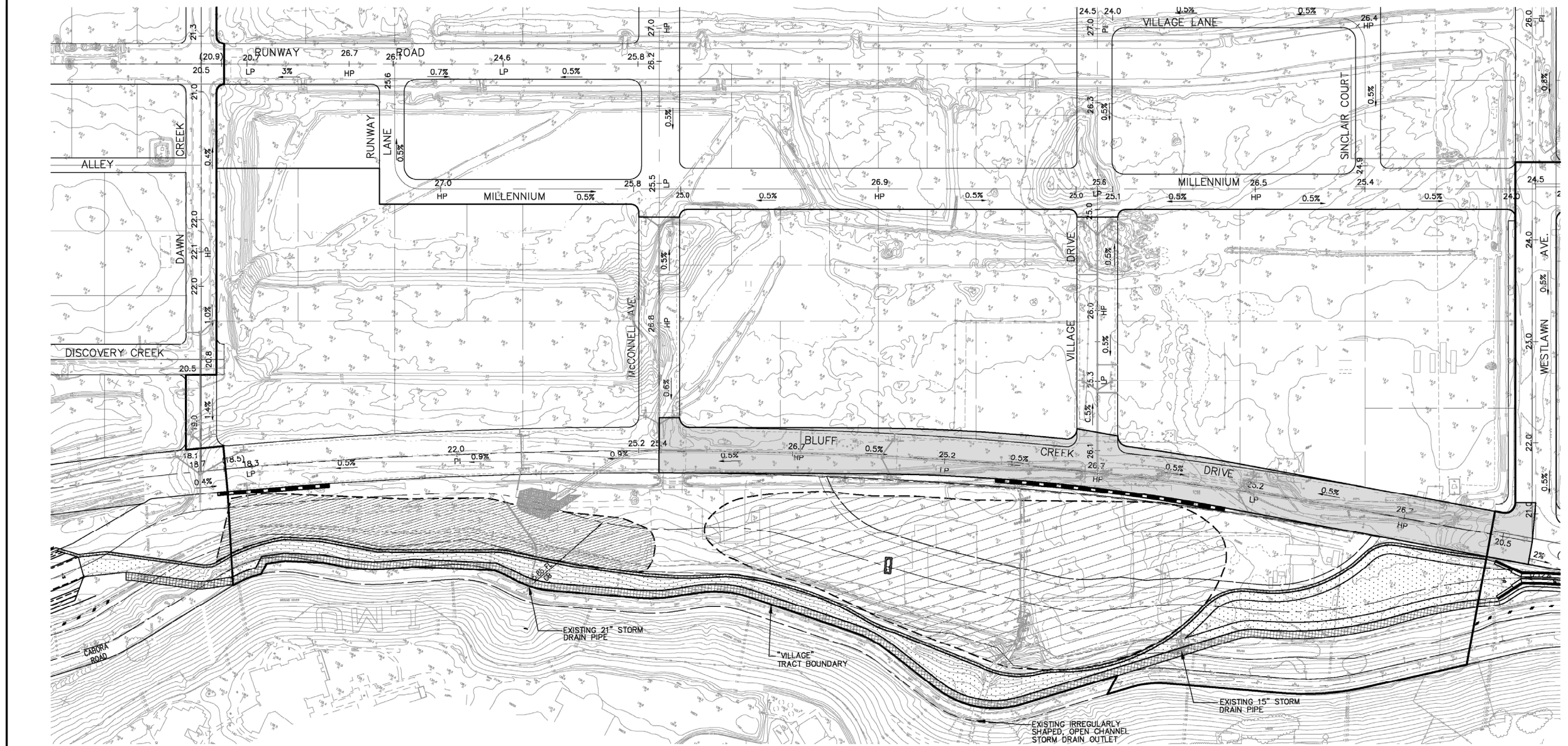
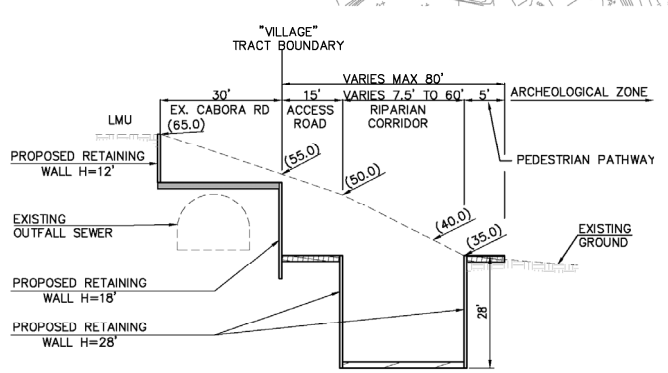
Figure 11. Map of Option 4: Alignment Study.





LEGEND

- ARCHEOLOGICAL ZONE LAN–62
- ARCHEOLOGICAL ZONE LAN–211–H (RECOVERY PLAN)
- RIPARIAN CORRIDOR
- ACCESS ROAD/TRAIL
- PROPOSED REALIGNED BLUFF CREEK DRIVE

ALIGNMENT NOTES:

1. Bluff Creek Drive remains in its current location.
2. The riparian corridor gets relocated south of the archeological zone, and it is forced only to happen within the plahse 2 boundary.

REALIGNMENT IMPACTS:

1. Requires large and tall retaining walls.

100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

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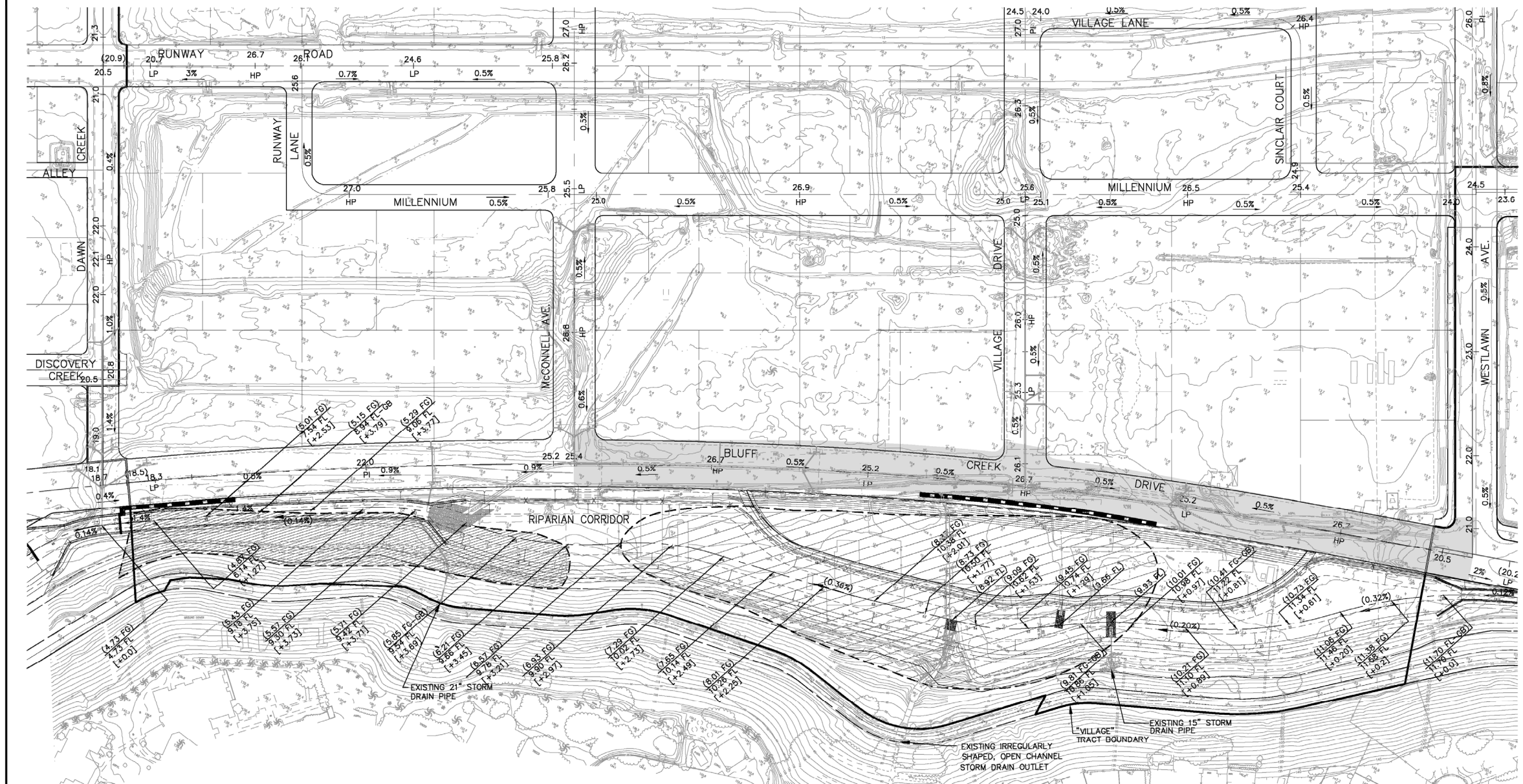
Figure 12. Map of Option 5: Realignment within Phase 2.



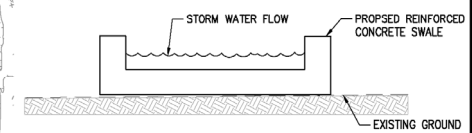
SECTION ALONG CENTERLINE OF RIPARIAN CORRIDOR

LEGEND

ARCHEOLOGICAL ZONE LAN–62

ARCHEOLOGICAL ZONE LAN–211–H (RECOVERY PLAN)

PROPOSED REALIGNED BLUFF CREEK DRIVE



PROPOSED SWALE
NTS

ALIGNMENT NOTES:

1. Bluff Creek Drive and the Riparian corridor remain in their current location.

2. A shallow riparian corridor.

REALIGNMENT IMPACTS:

1. The proposed study still impacts the archeogolical zones LAN–62 and LAN–211.

2. It may discontinue wild life habitat.

3. It creates a wider corridor thus decreasing the park acreage.

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100' 50' 0' 100' 200'
GRAPHIC SCALE
Note: For reduced sized prints, original scale is in inches

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Figure 13. Map of Option 6: Shallower Realigned Riparian Corridor across Sites.

Preliminary Report on Data Recovery within the Phase 2 Project Area at CA-LAN-62 Locus D and CA-LAN-211/H, Playa Vista, California

Preliminary Report on Data Recovery within the Phase 2 Project Area at CA-LAN-62, Locus D, and CA-LAN-211/H, Playa Vista, California

by
Sarah J. Van Galder, Benjamin R. Vargas, Jeffrey H. Altschul,
John G. Douglass, Richard Ciolek-Torrello, and Donn R. Grenda

Prepared for
Playa Capital Company, LLC
5510 Lincoln Boulevard, Suite 100
Playa Vista, CA 90094

Technical Report 13
Statistical Research, Inc.
P.O. Box 390
Redlands, CA 92373

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September 2006

CONTENTS

List of Figures iii
List of Tables iii

Regulatory History 4
Archaeological Background 5
Methods 5
Overburden Removal 6
Trenching 6
LAN-211/H 6
Manual Excavation 8
LAN-62, Locus D 8
LAN-211/H 11
Mechanical Stripping 14
Results 14
LAN-62, Locus D 14
LAN-211/H 16
Features 17
Conclusions and Recommendations 23
References Cited 25

LIST OF FIGURES

Figure 1. The Playa Vista project area showing the location of LAN-62, Locus D, and LAN-211/H 2
Figure 2. LAN-62, Locus D, and LAN-211/H within the riparian corridor 3
Figure 3. The location of trenches at LAN-62, Locus D 7
Figure 4. The location of trenches at LAN-211/H 9
Figure 5. Excavated test pits at LAN-62, Locus D 10
Figure 6. Proposed and excavated test pits at LAN-211/H 12
Figure 7. Details of excavation strategy at LAN-211/H (Blocks A–E) 13
Figure 8. Areas mechanically stripped at LAN-62, Locus D, and LAN-211/H 15
Figure 9. Features at LAN-62, Locus D 21
Figure 10. Features at LAN-211/H 22

LIST OF TABLES

Table 1. Features at LAN-62, Locus D, and LAN-211/H 18

This report summarizes archaeological data recovery work undertaken by Statistical Research, Inc. (SRI), at CA-LAN-62, Locus D, and CA-LAN-211/H (hereinafter referred to as LAN-62, Locus D, and LAN-211/H, respectively). Both are multicomponent sites that are considered contributing elements to the Ballona Lagoon Archaeological District (BLAD) (Altschul et al. 1991, 2003). As such, they were determined by the U.S. Army Corps of Engineers (Corps) to be eligible for listing in the National Register of Historic Places (NRHP). LAN-62 is divided into four loci (A–D), for management purposes. Loci A–C are located within Phase 1 of the Playa Vista development (Figures 1 and 2) and Locus D is located in Phase 2. All of LAN-211/H is located within Phase 2. Data recovery efforts at LAN-62, Locus D, and LAN-211/H were undertaken in advance of proposed impacts to the sites; these impacts are related to the construction of the riparian corridor—an important habitat and water-quality and flood-control feature of the Playa Vista Archaeological and Historical Project (see Figure 2). This report provides sufficient information to support our recommendation to allow construction activities in those portions of LAN-62, Locus D, and LAN-211/H located within the area of potential effect (APE) of the Phase 2 development of the Playa Vista project. This recommendation is based on the fieldwork as completed and is contingent on the completion of nonfield tasks to be described herein. Nonfield tasks are still in progress, and a complete technical report will follow at a later date.

The fieldwork for LAN-62, Loci A, B, and C, was conducted between September 11, 2003, and August 27, 2004 (Vargas et al. 2005). Fieldwork for LAN-62, Locus D, began on August 29, 2005, and was completed on September 16, 2005. Fieldwork at LAN-211/H was conducted between September 9, 2005, and December 9, 2005. Field efforts at these sites were successful at collecting a wide range of data relevant to the research questions detailed in the data recovery plans (Altschul 1991; Altschul et al. 1991, 2003). SRI's excavations at LAN-211/H revealed a thick, mostly intact, dark archaeological deposit that has the potential to help us address important research issues for both the prehistoric and historical-period occupations of the Ballona. The cultural deposit at LAN-62, Locus D, was much less dense, showed significant signs of disturbance, and appeared to have less potential for contributing significantly to our understanding of prehistory. This report presents the field methods employed at LAN-62, Locus D, and LAN-211/H together with a brief discussion of the preliminary results of our work.

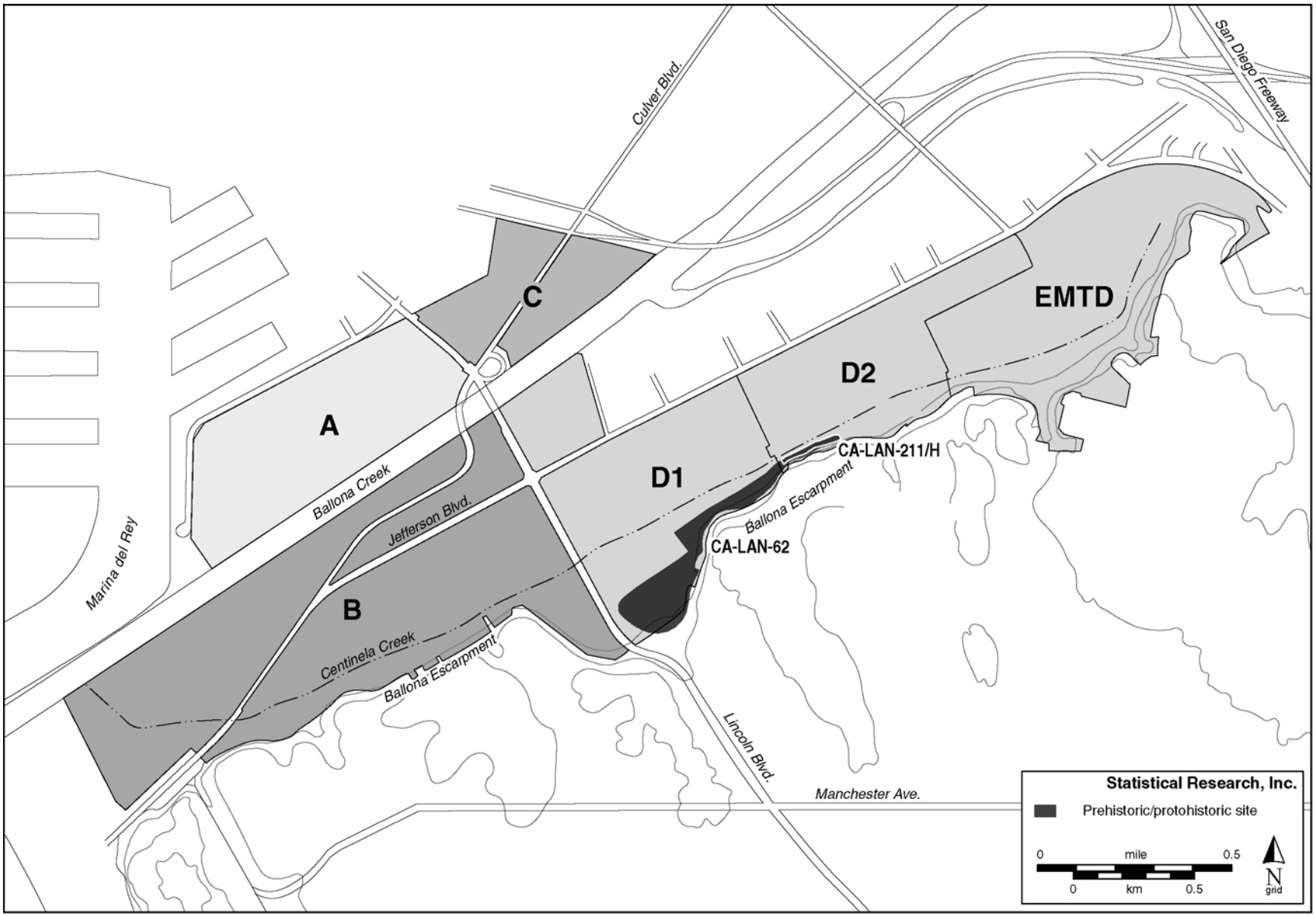

Figure 1. The Playa Vista project area showing the location of LAN-62, Locus D, and LAN-211/H.

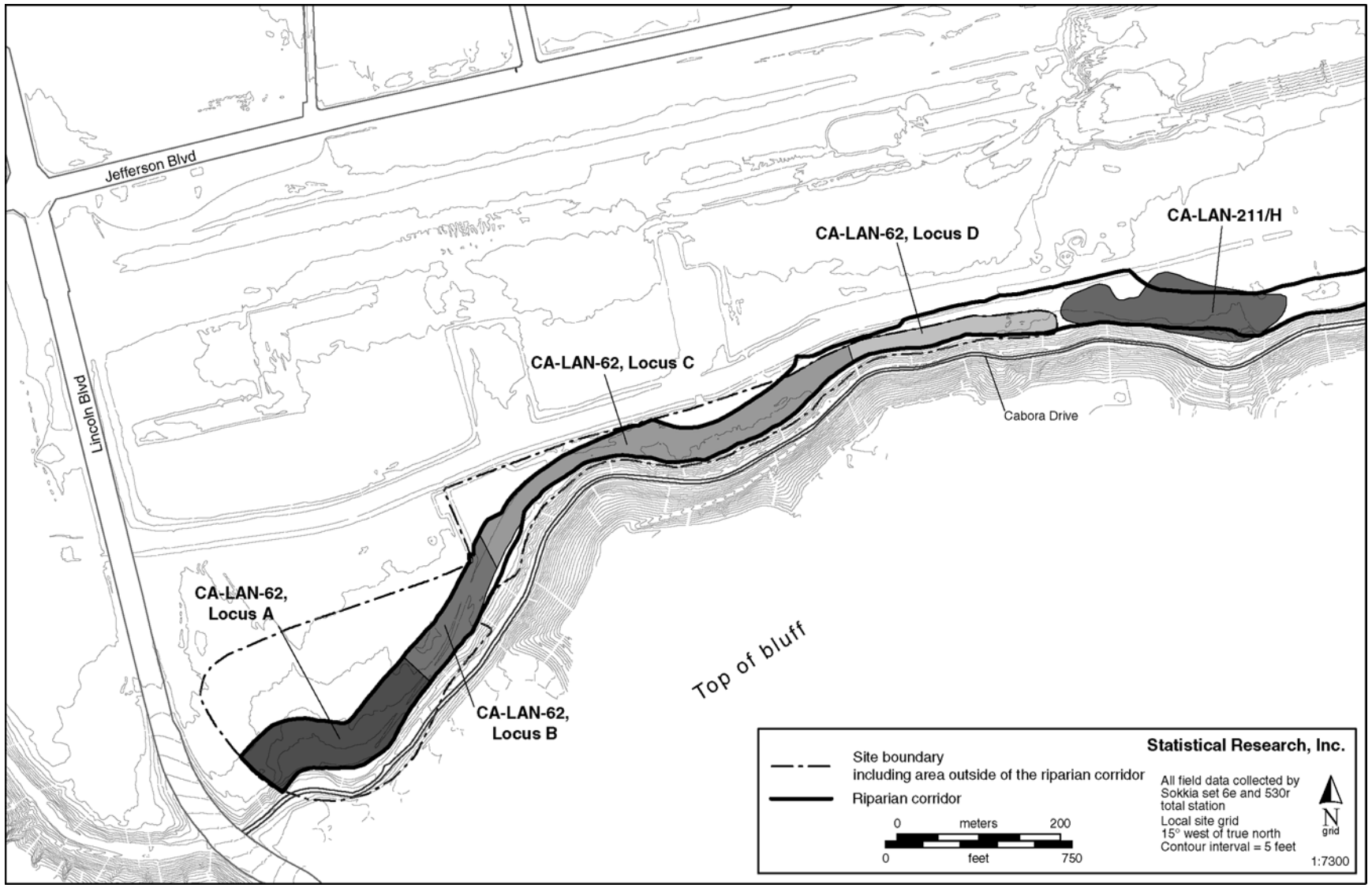

Figure 2. LAN-62, Locus D, and LAN-211/H within the riparian corridor.

Regulatory History

Development within Playa Vista is subject to a number of environmental regulations. Under the Clean Water Act, wetlands and projects that affect them fall under the jurisdiction of the Corps. Prior to the construction of the freshwater marsh and riparian corridor at Playa Vista, the Corps issued a permit under Section 404 of the Clean Water Act. The issuance of a permit is defined in the National Historic Preservation Act (NHPA) as an undertaking. It is also considered a major federal action as defined in the National Environmental Policy Act (NEPA). The Corps, therefore, must comply with Section 106 of the NHPA and prepare the documentation required under the NEPA. Additionally, the Playa Vista project required compliance with the California Environmental Quality Act (CEQA), and portions of the development (though not Phase 2) fall under the jurisdiction of the California Coastal Act. Accordingly, the applicant needed to comply with stipulations pertaining to archaeological and historical sites in those acts.

As part of implementing the regulatory regime over the course of the project, in 1991, the Corps, the California State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP) entered into a programmatic agreement (PA). Concurring parties who signed the document included the original Playa Vista development entity (Maguire Thomas Partners/Playa Vista [MTP]) and three Native American groups or individuals. The current master developer, Playa Capital Company, LLC, is the successor in interest to MTP. The PA governs the identification, evaluation, and treatment of significant archaeological and historical resources affected by Playa Vista. The PA was extended in 2001 and expires in 2011. The PA requires the Corps, in consultation with the SHPO, to develop archaeological treatment plans (ATP) for all sites listed in or eligible for listing in the NRHP within Playa Vista. The PA references a research design for Playa Vista (Altschul et al. 1991), determines that the sites that are now designated LAN-62, Locus D, and LAN-211/H are eligible for listing in the NRHP, and accepts an ATP, also referred to as a data recovery plan, for LAN-62 (Altschul 1991). Accordingly, the 1991 PA covers the area now known as LAN-62, Locus D, and LAN-211/H.

In 2003, an ATP was accepted by the signatories to the PA for LAN-211/H (Altschul et al. 2003). The LAN-211/H ATP consists of nine elements divided into field and nonfield tasks. Field tasks as outlined in the treatment plan require:

- mechanical removal of the overburden to be monitored by an archaeologist;
- backhoe trenching across the site to document soil stratigraphy, depth, and composition of the cultural deposit, as well as to define boundaries;
- characterization of the midden through hand excavation;
- mechanical stripping of site material to explore and investigate larger portions of the site; and
- manual recovery of all features located during this second phase of mechanical stripping.

The nonfield tasks as outlined in the treatment plan require:

- a mechanism for Native American participation in the project and treatment of human remains and associated grave goods;
- analysis of artifacts and samples recovered in the field;
- technical report documenting the results of excavation and analysis that meets professional standards;
- curation of project materials in a repository meeting federal standards.

These nine elements are consistent with the nine elements outlined in the 1991 ATP for LAN-62.

Archaeological Background

Excavations conducted in the Ballona area prior to ownership by MTP and Playa Capital, and prior to SRI's involvement, are discussed in detail in Altschul et al. (2003). SRI began work at Playa Vista in 1990 when Altschul and his colleagues (Altschul et al. 1991) surveyed the property below the Westchester Bluffs. During this survey, SRI identified several intact cultural deposits within the current boundaries of LAN-211/H. In 1999, SRI undertook fieldwork in the area of LAN-62, Locus D, and LAN-211/H in three phases. The first was a discovery phase devised to target areas of potential archaeological sensitivity as suggested by paleonenvironmental reconstruction. The second phase consisted of boundary testing at LAN-62, accomplished through two series of trenches. The third phase called for the testing and evaluation of two possible sites, then known as SR-12 and SR-13, now LAN-2769 and LAN-211/H, respectively (Grenda et al. 1999). Fieldwork in these phases included bucket augering and coring to find sites, mechanical trenching to define site boundaries, and manual excavation to assess site integrity and obtain controlled samples.

This strategy resulted in redefining the boundaries of three sites (LAN-62, LAN-211/H, and LAN-2769) and identifying and evaluating buried cultural deposits at the base of the bluffs. LAN-2769 was determined to be ineligible for listing in the NRHP as a contributing member of the BLAD (Altschul et al. 2003:248). The boundary of LAN-62 was substantially expanded: the site now covers the area previously recorded as LAN-211/H by Thiel (1953). The designation LAN-211/H was moved east to encompass a cultural deposit identified in 1990 as SR-13 (Altschul et al. 2003:51–52). Bucket augering throughout Locus D, revealed cultural remains scattered throughout the project area. Many of the cultural materials recovered were found in highly disturbed contexts; intact cultural deposits were found in other areas such as at LAN-211/H (Vargas and Feld 2003).

As with most areas at Playa Vista, the nature of historical-period disturbance is highly variable. Bucket augering helped to further delineate site boundaries at LAN-211/H and LAN-62, but also pointed to the need for more-focused excavations. As a result, test units were excavated at LAN-211/H and in portions of LAN-62 where a large alluvial fan creates a bench at the base of the bluff. These test excavations revealed a thick, intact deposit covering a relatively large area. Numerous artifacts and varying densities of vertebrate and invertebrate fauna were collected from these deposits. At LAN-211/H, more intensive testing, including manual and mechanical excavations, confirmed the findings of the bucket augering program. At LAN-62, Locus D, trenching revealed a discontinuous cultural deposit that had been subject to years of disturbance from farming, Hughes Aircraft Company–related construction activity, and other modern disturbances. Based on these excavations, Altschul developed work plans for data recovery at LAN-62, Locus D, and LAN-211/H.

Methods

As proposed in earlier treatment plans, data recovery at LAN-62, Locus D (Altschul 1991), and LAN-211/H (Altschul 1991; Altschul et al. 2003), was conducted as a series of phased activities beginning with exploratory trenching and concluding with the identification and recovery of all significant site features. The five phases of work included: (1) mechanical stripping of fill and overburden material, (2) mechanical excavation of trenches, (3) manual excavation of control units into the cultural deposit, (4) mechanical stripping and screening of soils to locate features, and, if discovered, (5) manual excavation of features.

Overburden Removal

The first phase of mechanical stripping removed modern fill materials to a depth just above intact cultural deposits at both LAN-62, Locus D, and LAN-211/H. Fill in these areas consisted of both natural colluvial deposits, redeposited soils, and imported soils placed over intact natural soil horizons. Fill was removed using an excavator fitted with a flat blade on its bucket and both paddle wheel and belly-loading scrapers. Stripping was conducted within the boundaries of the proposed riparian corridor and was directed and closely monitored by SRI staff archaeologists. When intact soil horizons were identified, excavations were halted and moved to new locations. A gravel parking area previously covered most of LAN-62, Locus D, and asphalt, pavement, and several buildings once covered the surface of LAN-211/H. Stripping within the LAN-211/H site boundaries required mechanical removal of buildings and associated basement structures, as well as other Hughes Aircraft Company–related infrastructure. The depth of fill varied greatly across this large area, from only a few centimeters to more than 2 m in some areas.

Trenching

In 2001, prior to the data recovery operations discussed in this report, 22 trenches and 7 mechanical test pits had been excavated along the base of the bluffs, beginning on the western edge of LAN-211/H and extending across LAN-62, Locus D, to the eastern edge of LAN-62, Locus A (Altschul et al. 2003). These trenches were used to document soil stratigraphy and the depth and composition of the cultural deposit, to collect samples, and to delineate the extent of the vertical and horizontal site boundaries. A challenge faced by this trenching program was the presence of thick fill deposits overlying prehistoric cultural materials. Because of the great depth of these trenches, investigators often could not safely enter trenches, making stratigraphic interpretations difficult and sometimes impossible. As noted above, in 2005, fill was mechanically removed at both LAN-62, Locus D, and LAN-211/H.

LAN-62, Locus D

After overburden was removed in 2005, a second series of 10 trenches was excavated within the LAN-62, Locus D, boundaries (Figure 3). These trenches were placed at roughly 30-m intervals and ran north from the southern boundary of the APE. These trenches were critical in refining site boundaries and defining the stratigraphic profile of the site. They revealed that intact cultural deposits were largely restricted to the southern portion of the APE and extended into the slope below the bluff. It is important to note that these trenches were used to identify locations for later manual excavations.

LAN-211/H

Testing conducted in 1999 at LAN-211/H revealed an intact and dense archaeological midden in a portion of the site (Altschul et al. 2003). The results of bucket augers helped define the site boundaries, although this information was inconclusive. In the northeastern portion of the site, where SRI was unable to open larger excavation areas, there remained some question as to the integrity of the cultural deposits. Once overburden was removed and buildings were demolished in these areas in 2005, it was possible to excavate another series of trenches to further delineate the site boundaries. Eight trenches were excavated

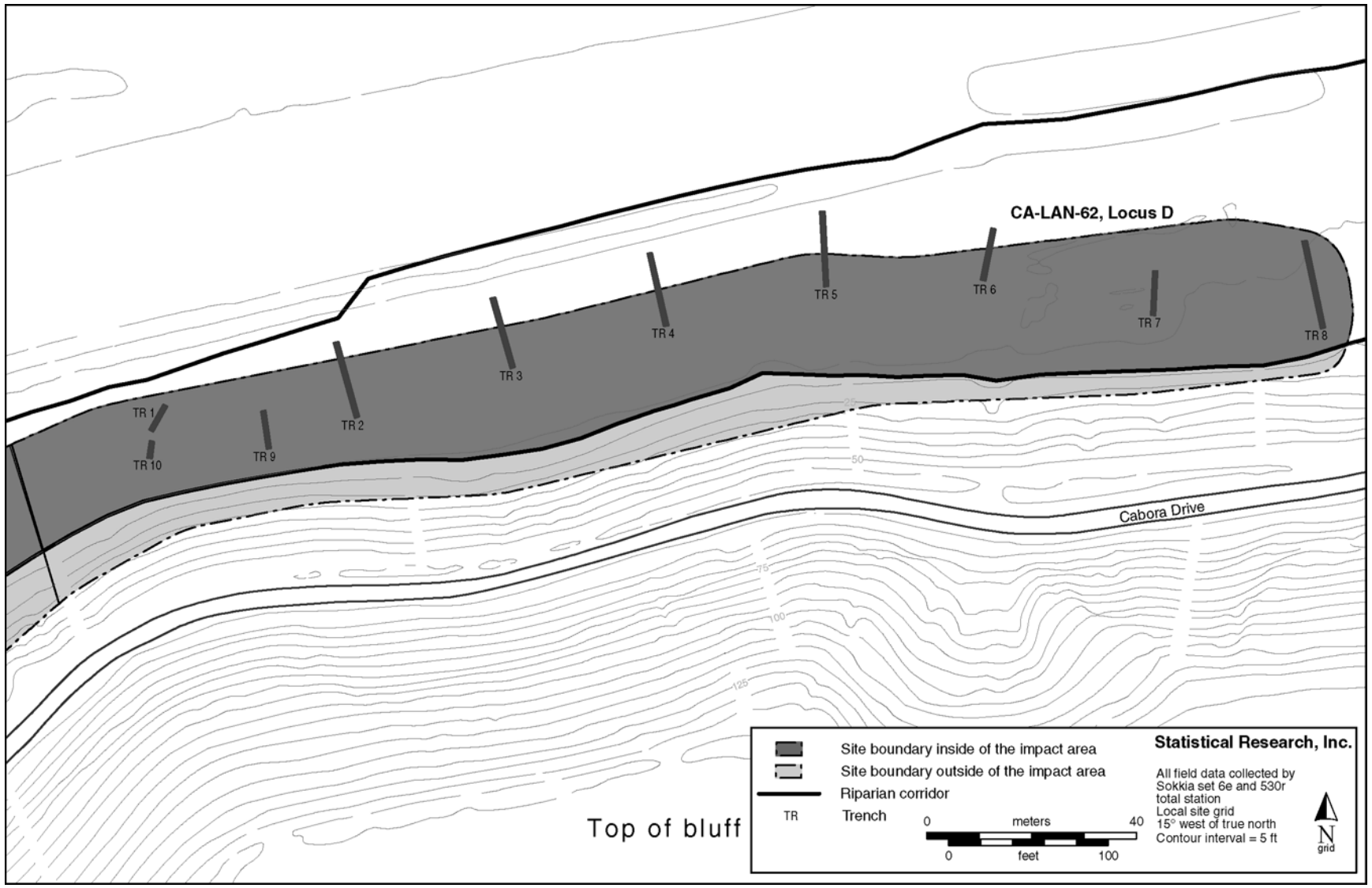

Figure 3. The location of trenches at LAN-62, Locus D.

prior to undertaking manual excavations at LAN-211/H (Figure 4). Similar to the additional trenches excavated at LAN-62, Locus D, this new set of trenches was critical in identifying the extent of intact cultural materials at LAN-211/H.

As stated in the work plan for LAN-211/H (Altschul 2005a), mechanical trenching performed before the 2005 hand excavations is sufficient for the completion of the second element of the ATP mentioned earlier in this report. Two additional trenches were excavated within the LAN-211/H site boundaries during the hand-excavation phase of data recovery operations. One of these trenches was excavated on the lower, northern portion of the APE; the other trench was excavated on the slope, in the southern portion of the site boundary. Both trenches were placed to investigate the depth of cultural deposits within the LAN-211/H boundaries, and both were successful at this task.

All trenches were excavated using either a backhoe or an excavator fit with a flat blade, usually 3 feet in width. Small lifts were excavated to reveal features or other anomalies, as well as to investigate soil changes. After mechanical excavation, both walls of each trench were cleaned with a shovel or a trowel to document soil stratigraphy and the presence, integrity, and composition of cultural deposits. Preparation of the trench sidewalls allowed for exposure of artifacts, stratigraphic boundaries, and features. After a trench sidewall was prepared, documentation, including photography and a measured drawing delineating identifiable soil characteristics, took place. Samples for pollen, phytolith, soil testing, and flotation were collected when deemed necessary by the archaeologist recording the feature.

Manual Excavation

The work plans for LAN-62, Locus D, and LAN-211/H (Altschul 2005a, 2005b) detailed the areas of intact site to be impacted by riparian-corridor construction grading. Based on testing in 1999 and trenching activity in 2005—and in accordance with work plans written for other sites within the Playa Vista project—SRI proposed to excavate a 1 percent sample of the total intact site area within the APE. The work focused on the area of direct impact from excavation of the riparian channel.

LAN-62, Locus D

At LAN-62, Locus D, we initially suggested that an area of approximately 3,600 m^2 existed within the APE, which resulted in an area of 36 m^2 proposed for excavation at LAN-62, Locus D (Altschul 2005b). We estimated that the cultural deposit averaged 2 m in depth across the site, and a total of approximately 72 m^3 would be hand excavated during data recovery.

Data recovery excavations undertaken in 2004 at Locus C of LAN-62 encountered a substantial cultural deposit of which approximately 64 m^3 was excavated. Because this work was conducted adjacent to the western edge of Locus D, it was proposed that a sufficient sample of cultural materials had been collected in this area. With agreement from the Corps, SRI proposed excavations in intact areas within the eastern portion of the site at LAN-62, Locus D. To meet the goals set forth in the work plan, we proposed to excavate several blocks of contiguous 1-by-1-m test pits (Figure 5). The manual excavation phase at LAN-62, Locus D, began on August 29 and was completed on September 16, 2005. Thirty-nine 1-by-1-m test pits were excavated by hand, and one feature was encountered in these excavations.

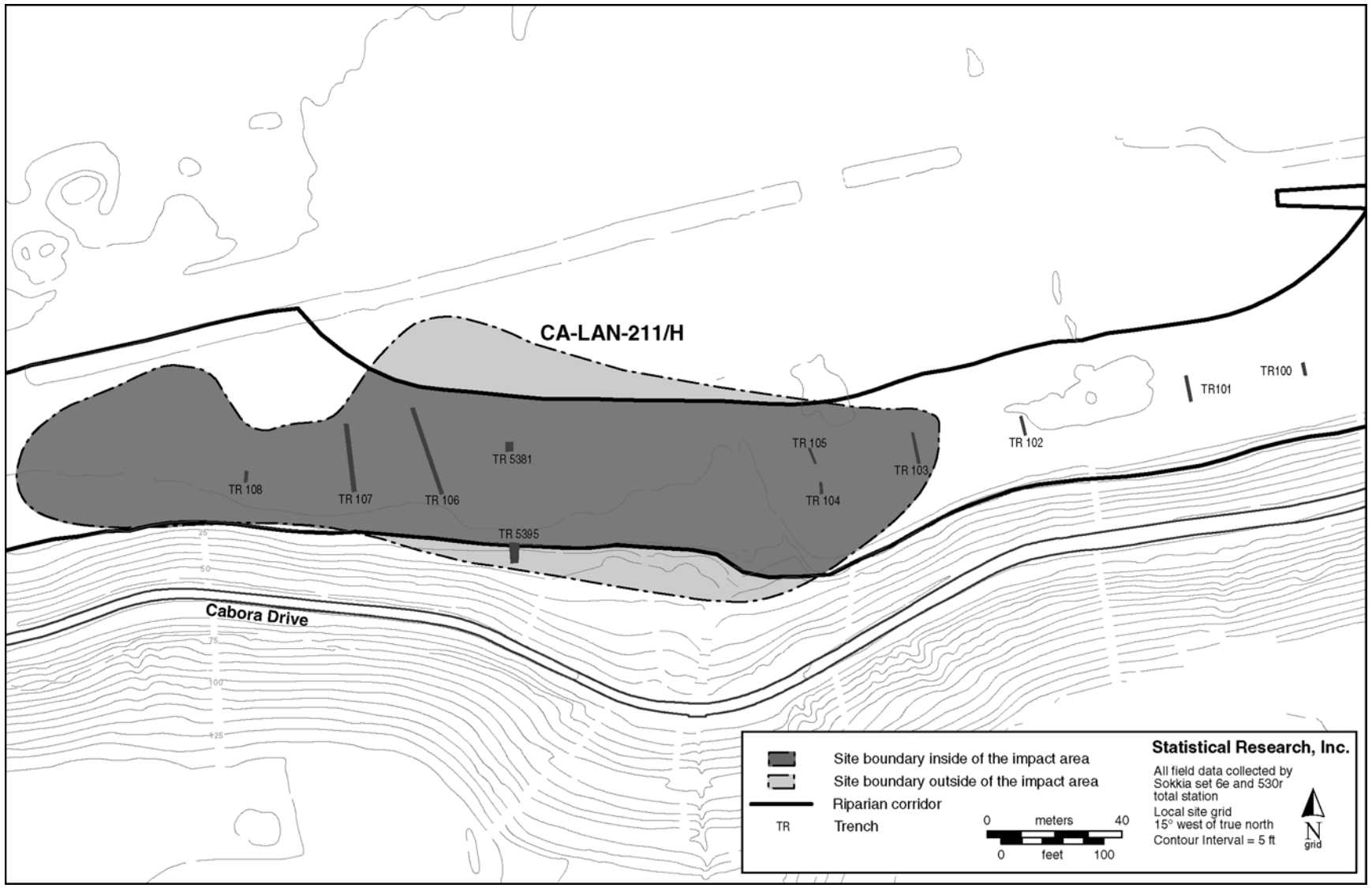

Figure 4. The location of trenches at LAN-211/H.

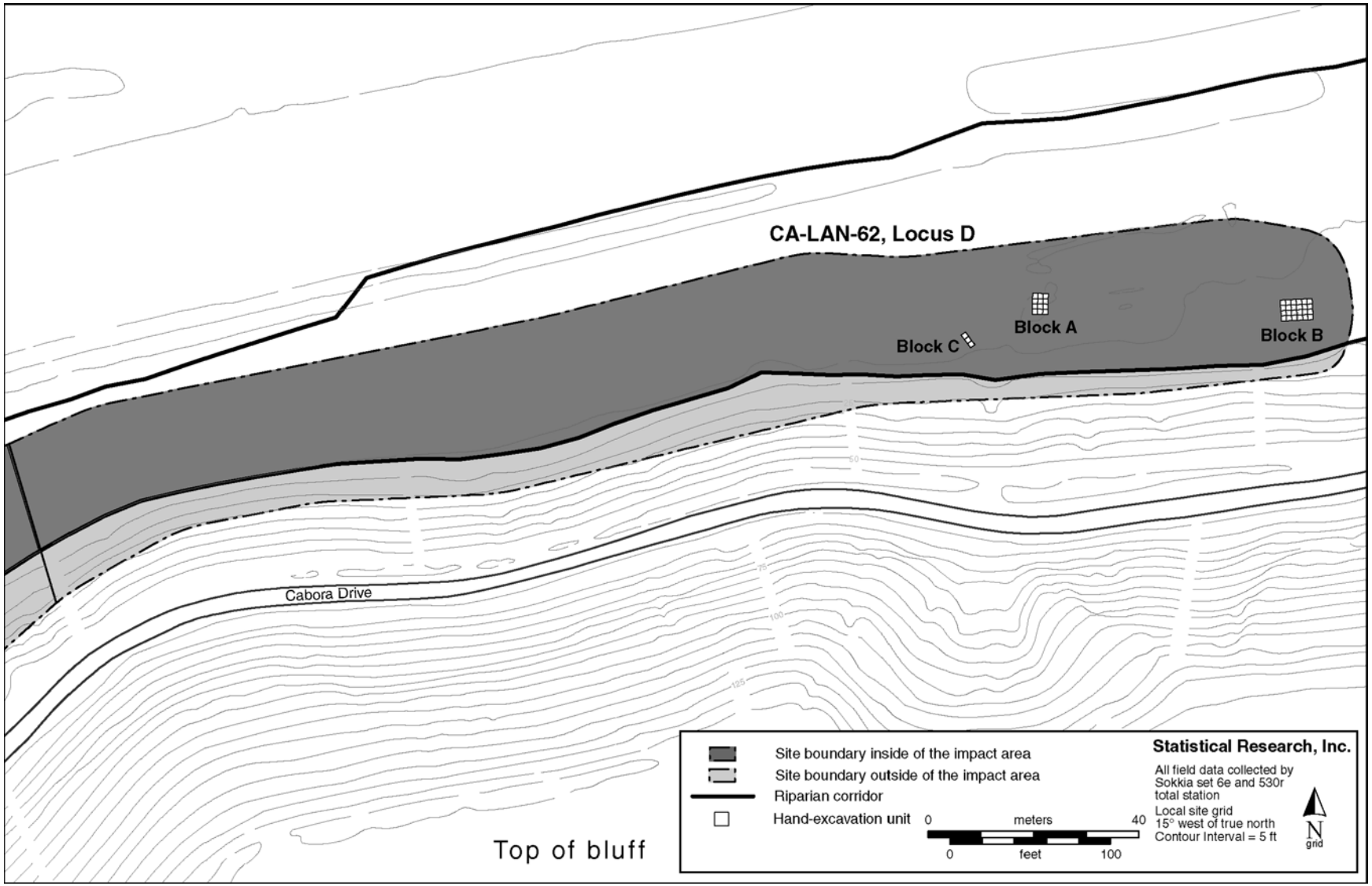

Figure 5. Excavated test pits at LAN-62, Locus D.

LAN-211/H

The original APE for LAN-211/H was considered to be the boundaries of the riparian corridor (Altschul et al. 2003:249–251). Although the site measured approximately 27,000 m^2, the impacts within the riparian corridor were calculated as 14,000 m^2. In the work plan (Altschul 2005a), the nature of impacts was altered to be inclusive of areas within the site boundaries that will have fill placed on them. This revision changed the APE to include the entire known boundaries of the site (27,000 m^2). Adhering to the procedures set forth at other projects at Playa Vista where a 1 percent sample of the total site area was excavated, we proposed a total of 270 m^2 for hand excavation. Using a combination of the data from testing in 1999 and additional trenches and overburden removal in 2005, we proposed excavations in two large blocks of contiguous 1-by-1-m units, with several other units to be placed at our discretion (Figure 6). Field conditions—namely, difficulties in excavating because of infiltration by groundwater—forced us to reconsider our strategy.

A single trench (No. 5381), placed in the northwestern portion of the site, indicated that intact, buried cultural deposits existed to depths of over 3 m below the ground surface. The presence of groundwater prevented safe excavations at certain depths; therefore, a strategy had to be devised to collect data from the range of appropriate archaeological contexts on the site. As presented in the original data recovery plan (Altschul 1991:4), it was necessary to recover samples of cultural material from all identifiable contexts within the APE. Because groundwater was encountered prior to reaching noncultural sediments, excavations had to be halted prior to reaching the lowest cultural deposits. SRI's geomorphologist determined that the lowest strata revealed in Trench 5381 were the same as strata recorded in the lower portion of the deposit higher on the slope during the 1999 testing program (Altschul et al. 2003).

A total of 101 total test pits was located in the northern part of Blocks A and B; these pits were hand excavated to below the uppermost cultural stratum, and stopped prior to hitting ground water. In southern units, where cultural deposits did not dip as deeply as in the north, we were able to dig 168 test pits through the entire column of cultural strata. To collect data from the deepest, and potentially oldest, deposits at LAN-211/H, a plan was devised to excavate on the slope an equal number of test pits to those that did not reach the lower strata in Blocks A and B below. This plan was accepted by the Corps and subsequently implemented.

Figure 7 details the results of this excavation strategy. A consequence of this strategy was that a substantially larger area (371 m^2) was excavated by hand than was outlined (270 m^2) in the original and revised work plans. At LAN-211/H, 370 1-by-1-m test pits were excavated by hand within five excavation blocks. Excavations began on September 9, 2005, and were completed December 9, 2005. A number of features, which will be detailed in the results section that follows, were encountered during these excavations.

Test pits at both sites were excavated in arbitrary 10-cm levels. All excavated materials from nonfeature contexts were placed in 5-gallon buckets labeled with the relevant provenience information for transport to the wet-screening facility. To process the large volume of excavated material efficiently, a mechanical wet-screening facility was employed. A Powerscreen Mark II screening plant, fitted with a double-deck $^1/_2$-over-$^1/_8$-inch-wire-mesh screen and spray nozzles, was used to wet-screen hand-excavated materials from nonfeature contexts.

Nonburial features were processed using a Dausman Flote-Tech Model A flotation machine. In keeping with the requests of the Native American Most Likely Descendant (MLD), matrix from burial features was processed by hand through $^1/_{16}$-inch-mesh wire screens. All matrix from individual burial features was collected separately with appropriate provenience information so that these materials could be reunited with the remains for later reburial.

Experience from previous excavations at Playa Vista showed that tracking the various excavations and the large quantities of materials required a sophisticated set of procedures. As part of this system, an

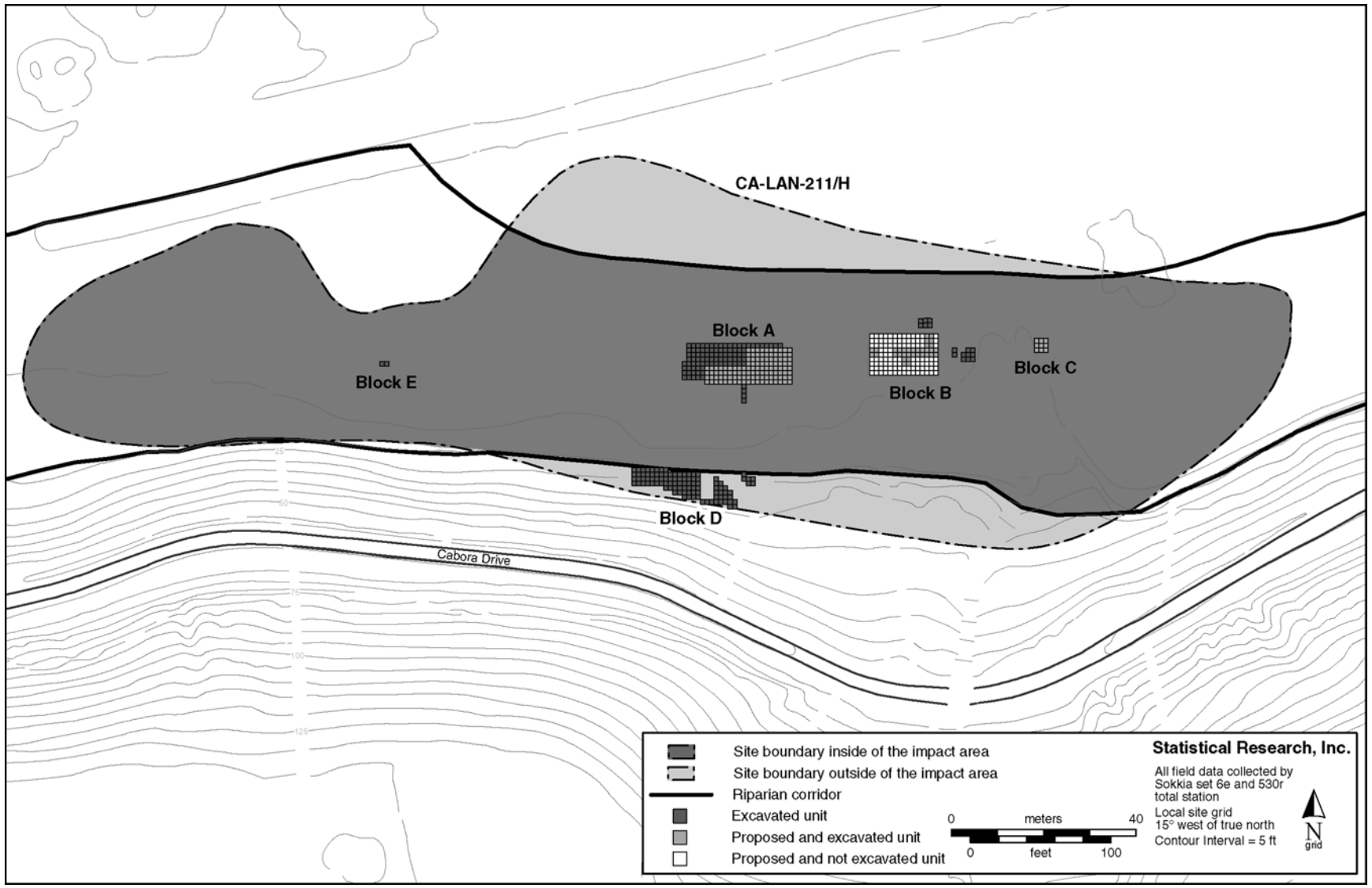

Figure 6. Proposed and excavated test pits at LAN-211/H.

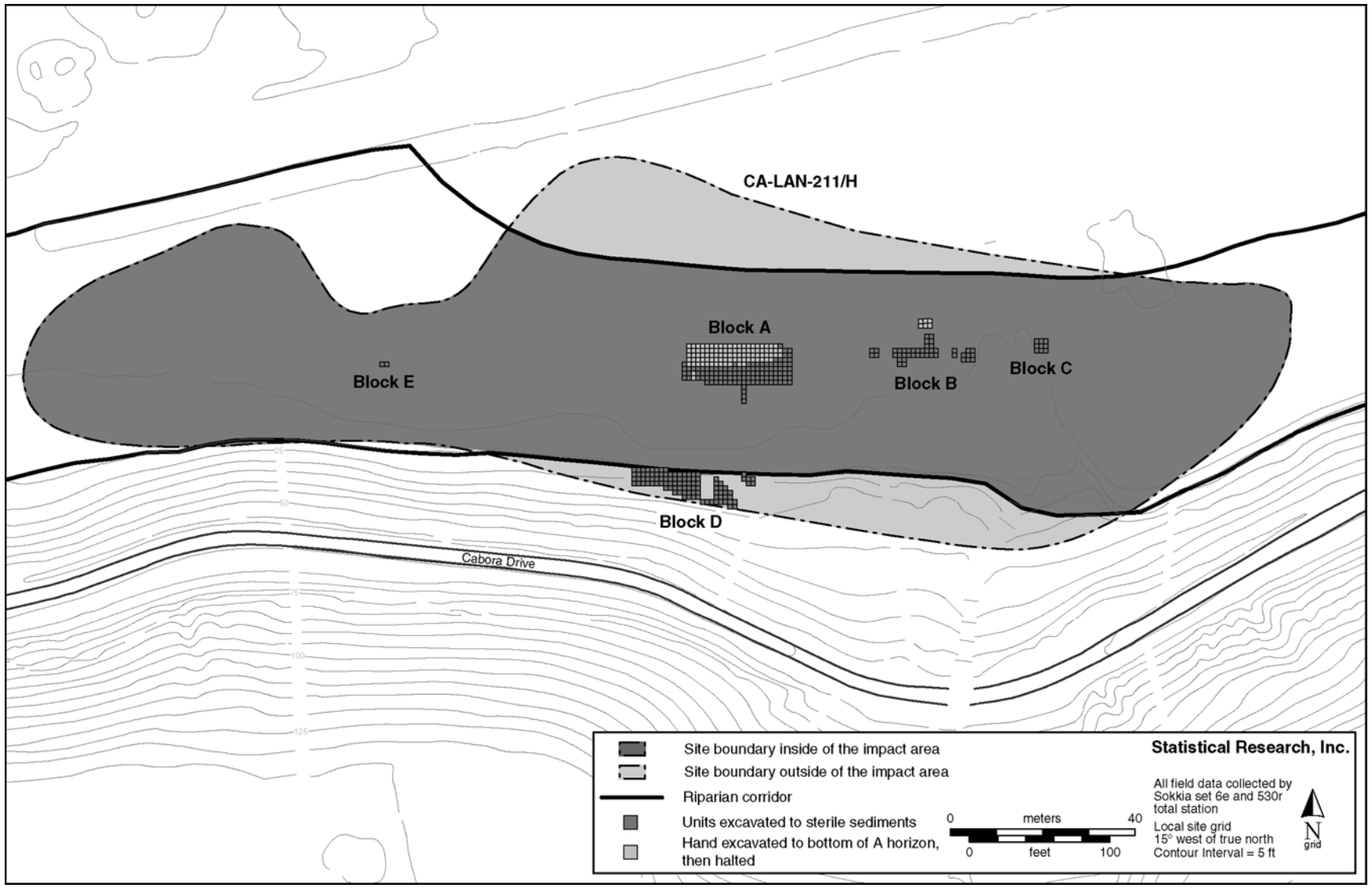

Figure 7. Details of excavation strategy at LAN-211/H (Blocks A–E).

in-field data-entry station was set up. Networked computers linked to a central database allowed all manual-excavation forms to be completed and printed in the field. In this manner, data-entry tasks were completed in the field. Before features were processed, data entries were checked for errors and corrected while the archaeologists responsible for completing field forms and performing the hand excavation were on-site.

A bar-coding system was used for labeling excavation lots and items collected from the fieldwork. Personnel responsible for screening used handheld personal digital assistants (PDAs), linked via a wireless network, to track buckets of excavated matrix prior to screening. Point-provenienced artifacts were also given bar-coded labels to speed the inventory process and to ensure that none was misplaced or separated from provenience information. The use of bar codes and in-field data entry worked to expedite the excavation, screening, and field inventory processes, and, most important, assisted with quality control.

Mechanical Stripping

Generally, mechanical stripping ran concurrently in portions of LAN-62, Locus D, and LAN-211/H while hand excavation was proceeding on other portions of both sites. Stripping began in the western portion of LAN-62, Locus D, and continued at different times through the end of fieldwork in LAN-62, Locus D, and LAN-211/H. Monitored mechanical stripping was conducted using an excavator fitted with a smooth bucket. In this process, a mechanical excavator was used to strip soils in small lifts approximately 3 feet wide; the excavator dug stratigraphically until culturally sterile strata or the bottom depth of the riparian corridor excavations were reached. This activity was closely monitored by a team of archaeologists, who continually checked for the presence of cultural features, diagnostic artifacts, and stratigraphic changes.

When prehistoric and historical-period nonburial features were encountered during stripping, they were mapped, photographed, and excavated by hand. Burial features were mapped and excavated by hand but not photographed. Isolates determined to be either culturally or temporally diagnostic were also mapped using a total station and collected for analysis. All areas impacted by excavations related to the construction of the riparian corridor were mechanically stripped under the direction of SRI personnel. Figure 8 details the locations of mechanically stripped areas at LAN-62, Locus D, and LAN-211/H.

Results

LAN-62, Locus D

Data recovery at LAN-62, Locus D, involved the excavation of 22 mechanical trenches and 39 1-by-1-m test pits within three larger excavation blocks, the recovery of three features, and the mechanical stripping of approximately 5,850 m^2. In general, LAN-62, Locus D, was characterized by a very low density of cultural materials, including small amounts of flaked and ground stone artifacts, faunal bone, shell, and historical-period artifacts. Three features were recovered at LAN-62, Locus D. One feature was found during hand excavation of Block B; two features were discovered during mechanical-stripping activities. All three of these features were late historical-period refuse dumps, one of which contained the remains of a horse.

The prehistoric archaeological deposits at LAN-62, Locus D, showed signs of significant disturbance, confirming the findings of our earlier testing programs. The nature of disturbance in this locus of LAN-62 is highly variable, quickly changing in locations only meters apart. It is likely that much of the upper

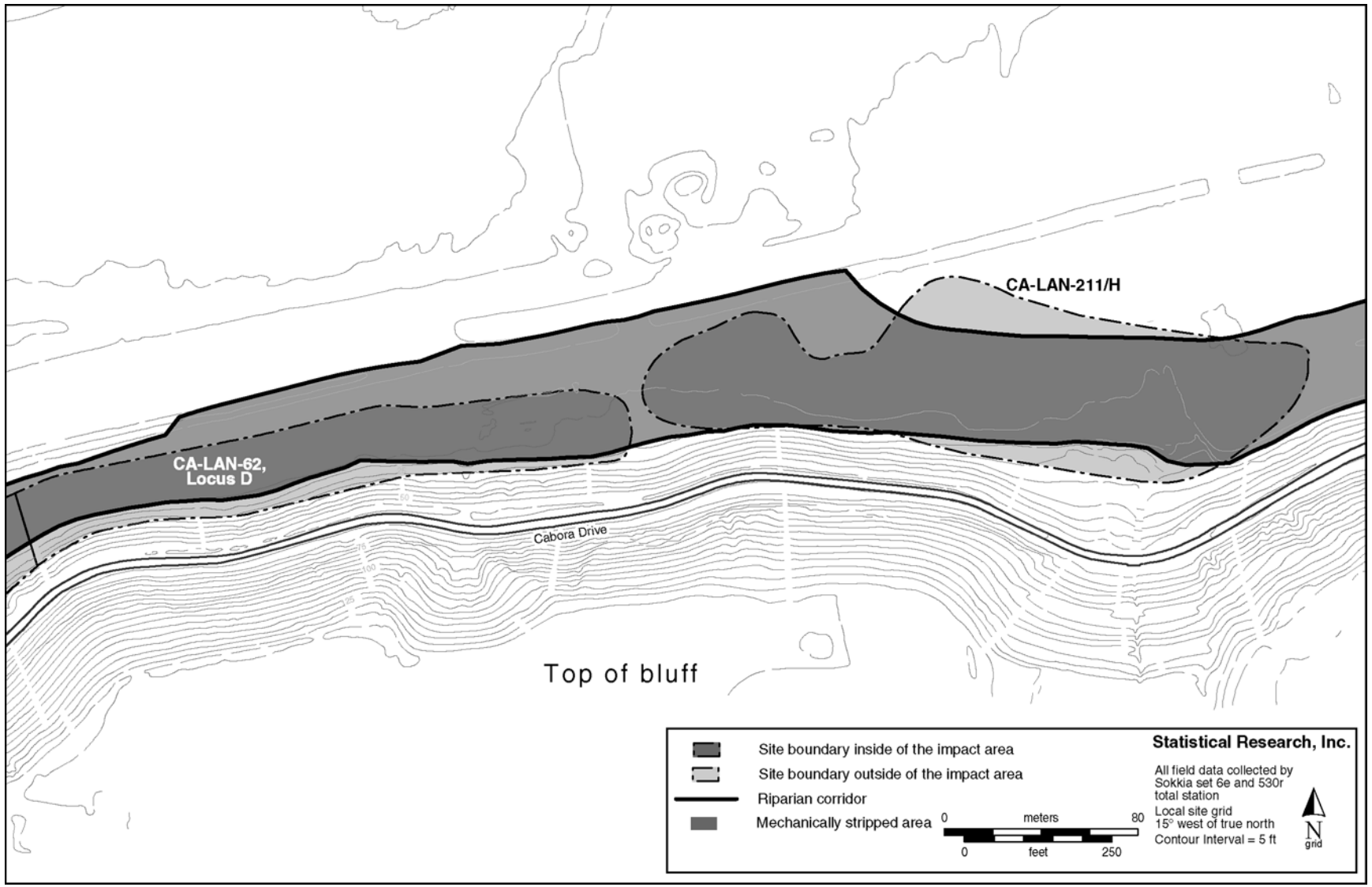

Figure 8. Areas mechanically stripped at LAN-62, Locus D, and LAN-211/H.

portion of the cultural deposits at Locus D have been truncated by either historical-period farming activities or more-recent Hughes Aircraft Company–related construction activities. From our preliminary glimpse at the prehistoric cultural deposits within Locus D, it appears that there will be little analytical value in the materials recovered. The lack of features in intact deposits dating to the prehistoric period seems to indicate very infrequent use of this area during that time. It is also clear that a large portion of the cultural materials has been removed, thus obscuring our view of the archaeological record in this area.

It is unlikely that materials recovered from LAN-62, Locus D, will be analyzed further as their informational value is very low. Data recovery also confirmed our earlier findings that pointed to a higher likelihood of intact archaeological materials near the base of the bluffs in this area. Trenches and test pits that were excavated into the slope did encounter intact deposits, so it appears that some portion of the site remains intact and undisturbed from activities associated with the construction of the riparian corridor.

LAN-211/H

Data recovery at LAN-211/H included the excavation of 10 mechanical trenches and 370 1-by-1-m hand-excavated test pits distributed in 5 blocks of different sizes, the investigation of 51 features, and mechanical stripping of an approximately 11,400-m^2 area. Fifty-one archaeological features were also investigated in this process. Our excavations revealed a highly variable cultural deposit that was intact and thick (over 3 m) in some areas, and truncated and disturbed in other areas. Intact deposits were found under the footprints of Hughes Aircraft Company-era buildings (especially Building 23) and directly under asphalt in some locations. The heaviest concentration of intact cultural materials was found in the central portion of site where most of our efforts were focused.

Four major stratigraphic breaks were identified during data recovery at LAN-211/H. These larger strata were broken into smaller units by SRI's on-site geomorphologists; for excavation purposes, the four major breaks were clearly identifiable and used to guide our work. The upper portion of the deposit at LAN-211/H contained a dense midden with a diverse collection of archaeological materials. Although this stratum was relatively thin (from 50 cm to just over 1 m), it contained large numbers of flaked and ground stone artifacts, faunal bone, worked bone, shell, ceramics, beads of stone and shell, and other botanical materials. Of importance in the collection from the upper stratum are materials introduced from contact with nonnative peoples. This category includes glass beads, flaked bottle glass, European and Chinese ceramics, metal, and the bones of domestic cattle. This portion of the deposit represents a protohistoric (ca. 1542–1769) or early-historical-period (ca. 1769–1834) occupation of the site and is of great importance to consider research questions posed in the ATP (Altschul et al. 2003:251–272).

Most of the features encountered at the site were also found in the upper stratum. Features will be discussed in more detail in a separate section below. The density of cultural materials dropped off significantly in lower strata and included small numbers of flaked and ground stone artifacts, sparse amounts of shell and faunal bone, and a few features. Our excavations were focused on lower-lying areas of the site but, as discussed in the methods section, included work on the upper slope in the southern portion of the site (Block D). In this area, the cultural deposit was much more sparse than below, but also displayed evidence of occupation of the site during the historical period. A few glass beads and bones of domestic cattle were noted during excavation of the upper strata in Block D. Overall, the density of cultural materials in Block D was very low in all strata, and only three features were recovered.

As mentioned above, disturbance to the site was highly variable. The presence of standing structures and paved areas overlying the site prior to our excavations pointed to heavy use of this area during the Hughes Aircraft Company era; research with aerial photographs indicated intensive use of the area even earlier for farming and ranching (Altschul et al. 2003:35–46). In some areas, this disturbance was significant and appeared to have resulted in the removal of much of the upper portion of the cultural deposit. Most of the upper stratum was completely removed in the southeastern portion of the site, for example,

whereas, in the northern half of the site, the upper stratum appeared to be almost completely intact. Although the site was completely removed during data recovery within the APE, there are large portions of the site that remain intact outside of the riparian corridor boundaries even after the completion of our investigations were completed. According to the current plans for development of this area, thick deposits to the north, in areas that will be under fill, and to the south, into the slope, will remain untouched.

Features

Fifty-three features were identified and excavated during data recovery operations at LAN-62, Locus D, and LAN-211/H. Three features were encountered at LAN-62, Locus D, and 50 were discovered and excavated during data recovery operations at LAN-211/H. Table 1 lists the various features and types recovered from our data recovery operations at LAN-62, Locus D, and LAN-211/H. Prior to undertaking data recovery at the two sites, a basic feature typology was created. This typology has been designed and modified over the past few years of work in the Ballona area. These feature types are preliminary, and, upon further analysis of individual features, may be adjusted in the future. Both burial and nonburial features were found at LAN-211/H, whereas only nonburial features were recovered from LAN-62, Locus D. At LAN-211/H, the features were found in all strata, although the majority were in the uppermost strata. At LAN-62, Locus D, the three features were all found at the contact between intact soils and historical-period fill materials. Each of the three features at LAN-62, Locus D, appear to date to the latter part of the historical period (Figure 9). Feature types encountered at LAN-62, Locus D, include one pit and two artifact concentrations.

The features at LAN-211/H consisted of 47 nonburial features and 3 human burial features. The nonburial features included activity areas, artifact concentrations, hearths, historical-period structural features, pits, and rock clusters. Figure 10 details the locations of all features at LAN-211/H. Hearths were the most dominant type of feature at LAN-211/H. Twenty-two of these features were found within the APE, in hand-excavation units and mechanically stripped areas. Hearths are generally described as locations where soils show signs of thermal alteration. At LAN-211/H, more than at any other site we have investigated in the Ballona, hearths were well preserved and clearly distinguishable from surrounding matrix. Generally, hearths consisted of small, roughly oval pits with heavily oxidized soils. In some cases these features appeared to have been filled with debris after their use; in other cases, they just appeared to have been abandoned. In several instances, there were ash deposits and fire-cracked rocks that appeared to have been “cleaned-out” from these pits.

When possible, archaeomagnetic samples were collected from hearth features in order to acquire additional chronometric data. These samples were collected and processed by SRI staff archaeologist William Deaver and processed through SRI’s archaeomagnetic program. Samples were collected from within seven different hearth features, but, unfortunately, soil conditions were not conducive to the procedure. Only one feature returned positive results, with a date range of A.D. 1760–1815. These initial results are currently being refined but appear to agree with other cultural materials, such as glass beads and domesticated cattle bones, pointing to an early-historical-period component at the site.

Second to hearths, rock-cluster features were found in some abundance at LAN-211/H. Our investigations found 14 features of this type. Rock-cluster features are the most common feature type found throughout our investigations in the Ballona, as well as at other sites in the southern California region. Rock clusters are described as discrete concentrations of modified and unmodified cobbles. At LAN-211/H we distinguished rock-cluster features from hearths or other thermal features based on a lack of obvious indications of thermal alteration to the surrounding matrix. The function of these features

Table 1. Features at LAN-62, Locus D, and LAN-211/H

Feature No. by Site	Feature Type	Description
LAN-62, Locus D		
675	pit	refuse pit with articulated bones from one horse
676	artifact concentration	a dense scatter of glass, metal, ceramics, plastic, and charcoal
677	artifact concentration	a scatter of small ceramic and porcelain sherds, glass, and faunal remains showing cutmarks made by a metal tool
LAN-211/H		
1	activity area	surface consisting of a variety of features and FAR, shell, flaked stone, ground stone, bone, and worked bone tools
2	artifact concentration	dense concentration of shell, FAR, flaked stone, ground stone, and bone
3	artifact concentration	oval concentration of greasy soil, FAR, charcoal, shell, ground stone, faunal bone, wood, and red ochre
4	hearth	irregularly shaped concentration of oxidized sediment, FAR, charcoal, ash, shell, flaked stone, and bone
5	rock cluster	oval concentration of FAR, charcoal, ash, and burnt bone
6	hearth	circular concentration of oxidized sediment, FAR, charcoal, ash, shell, flaked stone, and burnt bone
7	pit	circular pit containing a metal ring, two nails, and glass fragments
8	hearth	irregularly shaped concentration of oxidized sediment and charcoal
9		determined to be noncultural
10	rock cluster	irregularly shaped concentration of FAR and one flaked stone
11	pit	circular pit of darker sediments and ash containing some FAR and bone
12	hearth	oval concentration of oxidized sediment, FAR, charcoal, shell, and flaked stone
13	rock cluster	dense, circular concentration of FAR, charcoal, and faunal bone
14	hearth	irregularly shaped concentration of oxidized sediment, FAR, charcoal, shell, flaked and ground stone, and bone
15	rock cluster	concentration of FAR, shell, flaked stone, ground stone, and faunal bone
16	hearth	an oval concentration of oxidized sediment, FAR, charcoal, ash, and ground stone
17	hearth	an irregularly shaped concentration of oxidized sediment and charcoal
18	hearth	a circular concentration of oxidized sediment, FAR, charcoal, shell, flaked stone, and faunal bone
19	hearth	a discrete oval concentration of oxidized sediment, FAR, ash, shell, groundstone, and faunal bone

Feature No. by Site	Feature Type	Description
20		determined to be noncultural
21	hearth	concentration of oxidized sediment, FAR, charcoal, ash, shell, flaked stone, and faunal bone
22	hearth	concentration of oxidized sediment, charcoal, faunal bone, and shell
23	hearth	concentration of oxidized sediment, FAR, charcoal, ash, and faunal bone
24	rock cluster	concentration of FAR, charcoal, flaked stone, ground stone, and bone
25	rock cluster	concentration of FAR, charcoal, ground stone, bone, and worked bone
26	hearth	concentration of oxidized sediment, charcoal, FAR, shell, flaked stone, bone, and worked shell
27	human burial	incomplete remains of one infant, no associated grave goods
28	hearth	concentration of oxidized sediment, FAR, charcoal, shell, flaked stone, and bone
29	rock cluster	concentration of FAR, cobbles, and flaked stone
30	rock cluster	concentration of FAR and ground stone
31	hearth	concentration of oxidized sediment and FAR
32		determined to be noncultural
33	human burial	one adult male individual, no associated grave goods
34	rock cluster	concentration of FAR
35	hearth	concentration of black sediment and oxidized sediment, FAR, charcoal, shell, flaked stone, and burnt bone
36	hearth	no information
37	pit	soil anomaly, FAR, charcoal, flaked stone, ground stone, bone, and worked bone
38	pit	soil anomaly, charcoal, flaked stone, and bone
39	rock cluster	concentration of FAR, flaked stone, ground stone, and cobbles
40	activity area	area of FAR, shell, ground stone, and bone
41	hearth	concentration of oxidized sediment, FAR, charcoal, shell, and bone
42	hearth	concentration of oxidized sediment, FAR, charcoal, flaked stone, ground stone, and bone
43		determined to be noncultural
44	artifact concentration	concentration of FAR, charcoal, shell, flaked stone, ground stone, bone, and worked faunal bone

Feature No. by Site	Feature Type	Description
45	hearth	shallow area of oxidized sediment with large mammal bone nearby
46	rock cluster	concentration of cobbles, FAR, and charcoal, subfeature of Feature 40
47		determined to be noncultural
48	artifact concentration	concentration of large mammal bone, flaked stone
49	human burial	adult female, semiflexed, head to south, no associated grave goods
50	hearth	concentration of ground stone, flaked stone, faunal remains, FAR, and shell within an area of oxidized sediment
51	hearth	oxidized sediment with some FAR
52	rock cluster	dense concentration of ground stone, FAR, charcoal, ash, and oxidized sediments
53	rock cluster	concentration of FAR and small pieces of charcoal
54	structure	historical-period cistern
55		determined to be noncultural
56	rock cluster	concentration of ground stone, flaked stone, FAR, and a possible tarring pebble

Key: FAR = fire-affected rock

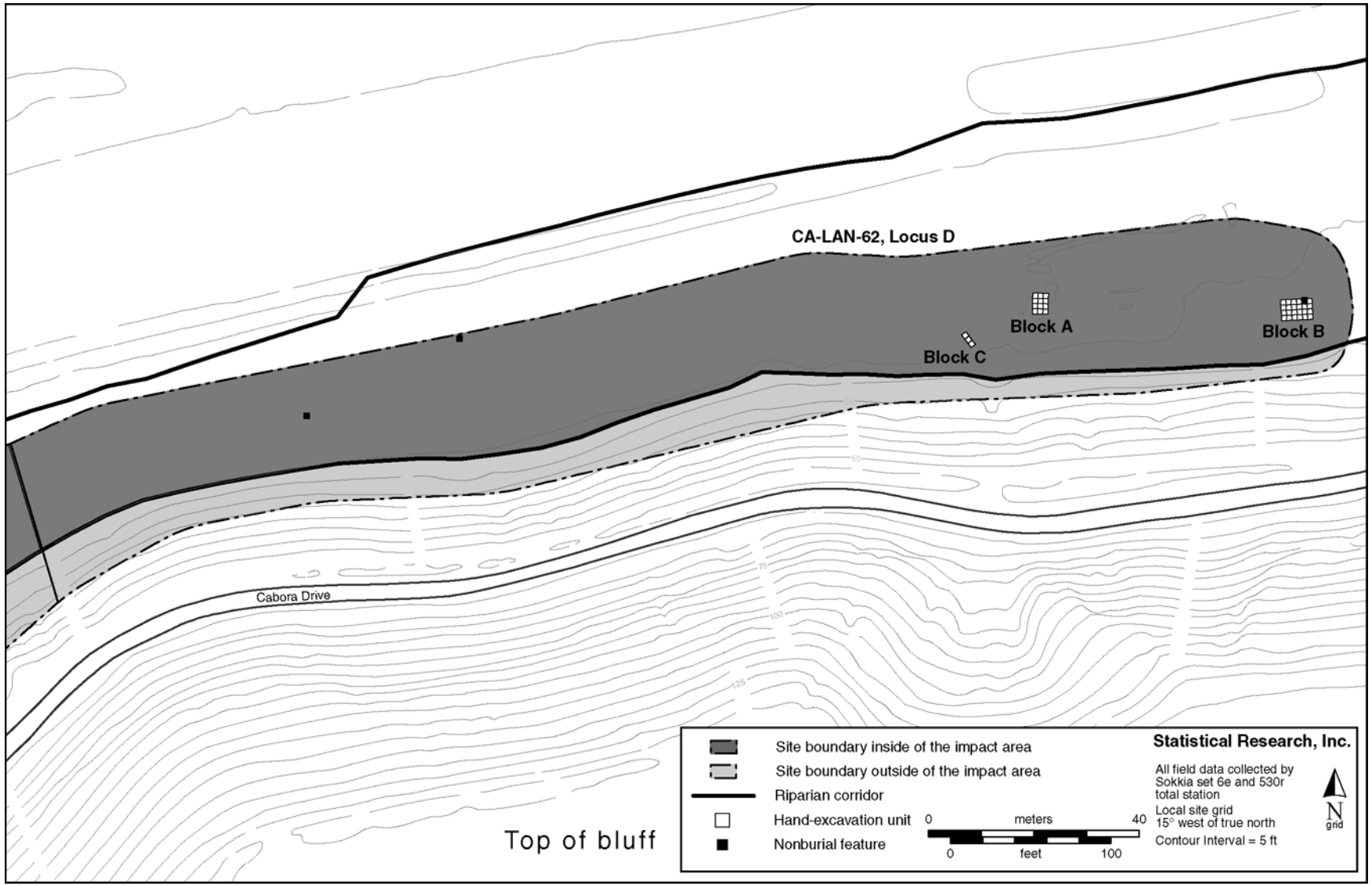

Figure 9. Features at LAN-62, Locus D.

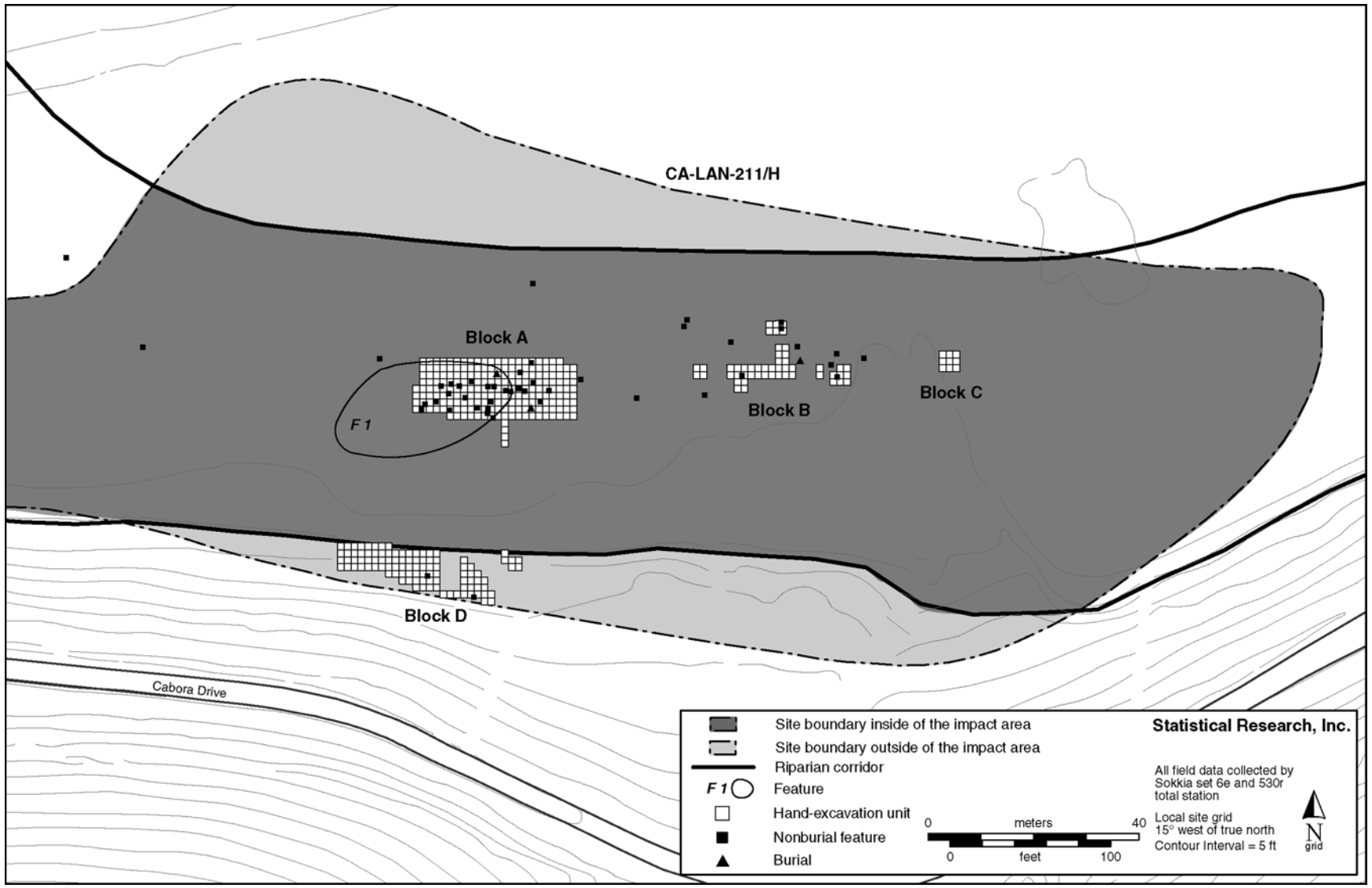

Figure 10. Features at LAN-211/H.

remains a mystery, although it is likely that these features represent a variety of activities. These features may have functioned as hearths, roasting pits, processing areas, structural elements, or may be indicative of hearth maintenance or "clean-out" activity.

Four artifact concentrations were identified during data recovery at LAN-211/H. Artifact concentrations consist of discrete clusters of artifacts that could not be clearly tied to other features. At LAN-211/H these features generally contained concentrations of animal bone, shell, charcoal, stone artifacts, or some combination of these materials. The function of these features remains a bit unclear, but, preliminarily, it appears that they may represent refuse dumping activity. The function of these features will become more apparent with further analysis of the materials that are contained in these concentrations.

Four features identified as pits were investigated at LAN-211/H. These features are characterized as intrusive soil anomalies that were filled with some type of distinguishing matrix and, occasionally, artifacts. A few of these features did not appear to contain any artifacts that were distinct from the surrounding midden but were identified mainly as distinct soil anomalies. It is possible that these features may represent storage or refuse disposal areas. Paleobotanical analysis may provide information as to their function.

Activity areas represent the identifiable loci of particular domestic or ritual activities. Often, these features consist of several of the various feature types described above within a bounded space. Two activity area features were identified and recovered during operations at LAN-211/H. Feature 1 is an example of this type of feature. It consisted of a large surface of butchered faunal material, hearths, pits, as well as tools made of stone, animal bone, and shell within the same archaeological stratum. When such relationships between features and artifacts are thought to exist, these discreet locations are defined as activity areas. It is likely that upon further analysis of other features and their relationships, more activity areas will be identified.

Three burial features were encountered during excavations at LAN-211/H. All three of the burial features showed significant signs of deterioration and consisted mostly of fragmentary remains. There were also a number of isolated fragments of human bone found in test pits but not directly associated with burial features. One burial feature consisted of the remains of an infant and was intrusive into the upper stratum. The other two burial features were intrusive into the lower strata. None of the burial features had any obvious grave goods associated with them, although analysis of the matrix surrounding these burial features has yet to be conducted.

Although the cultural deposit at LAN-211/H likely spans several millennia, the presence of a component of the site dating to the early historical period is of great significance. At earlier investigations of LAN-62, Locus A, SRI recovered a number of burials that dated to the early historical period. This conclusion was based on the presence of glass beads, metal artifacts, and other items of European manufacture (Vargas et al. 2005). Despite the large quantity of historical-period material found with the burials at LAN-62, Locus A, our excavations did not recover any evidence of domestic activity relating to this time period. At LAN-211/H we have much clearer evidence of early-historical-period domestic activity, and this site may be the best candidate for the residence of at least some of the early-historical-period people buried at LAN-62, Locus A. Further analysis of artifacts, features, and their associations will be key to understanding the nature of occupation of the Ballona during this poorly documented time period.

Conclusions and Recommendations

Although most of the archaeological materials collected from LAN-62, Locus D, and LAN-211/H have yet to be fully sorted and analyzed, some conclusions are evident from initial field observations. Sparse cultural deposits were found at LAN-62, Locus D. Most of the deposits at this location are highly

disturbed or have been altogether removed by earlier farming and Hughes Aircraft Company-related construction activities. Portions that were intact had very small amounts of cultural materials and no prehistoric features. At this point, it is unclear whether materials collected from the deposits at LAN-62, Locus D, will provide data that is useful to our pursuit of understanding the prehistoric occupation of the Ballona. Although it is apparent that people were in this area during prehistory, it does not appear that this was a major activity locus.

By contrast, LAN-211/H appears to be a multicomponent site, with an especially dense cultural deposit that dates to the early historical period. Artifacts such as glass beads, European ceramics, domesticated cattle bones, and shell beads with needle-drilled perforations were found in abundance in a portion of this deposit, clearly delineating a component that dates to the early historical period. This component has great potential for helping us address many of the research questions that we have presented previously relating to this period of time (Altschul et al. 1991, 2003; Vargas et al. 2003). In earlier documents, we have discussed the poorly documented nature of this time period in the Ballona and, more specifically, of the Tongva/ Gabrielino people of the region. The cultural deposit at LAN-211/H appears to represent a domestic component dating to the early historical period that we did not see at LAN-62, Locus A. Given the dearth of information about aboriginal life during the early historical period, LAN- 211/H represents an exciting opportunity for research with implications beyond the Ballona.

The field components of the archaeological treatment plan for LAN-62, Locus D, and LAN-211/H have been successfully completed and summarized in this document. Therefore, we recommend that the permit applicant, Playa Capital Company, be granted clearance by the regulatory agencies with respect to the effects of the Phase 2 construction on the archaeological sites LAN-62, Locus D, and LAN-211/H. Clearance is contingent, however, on completion of the remaining nonfield components of the treatment plan. The remaining components are as follows:

- appropriate analysis of the cultural materials;
- a technical report meeting professional standards;
- curation of project materials in a repository meeting federal standards; and
- repatriation of human remains and associated grave goods (if any) in accordance with procedures and requirements set forth in California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

The initial stages of laboratory processing and cataloging of archaeological materials recovered from LAN-62, Locus D, and LAN-211/H are currently underway. Following this task, a sampling strategy will be devised for analysis of these materials. Then, analysis of different artifact classes will be conducted by specialists and reports on their findings will be produced. Various cultural strata identified will be targeted for sampling for analytical purposes so that subsistence practices and technological information can be inferred from all components at the sites. Detailed analyses will be conducted on lithic artifacts, faunal materials, worked shell and bone, European-introduced materials such as glass beads and ceramics, aboriginal ceramics, and various soil samples. Any grave goods will be thoroughly analyzed and documented prior to repatriation.

All human remains will be inventoried and documented using only nondestructive methods. Where possible, determinations of sex, age, pathological conditions, genetic affiliation, health, and demography will be made prior to repatriation of the remains. The various analytical stages will be conducted as steps toward addressing research questions presented in the initial research design (Altschul et al. 1991) and in the ATPs for LAN-62 and LAN-211/H specifically (Altschul 1991; Altschul et al. 2003).

A report of publishable standards, detailing our work at LAN-62, Locus D, and LAN-211/H, will be part of an overarching statement on the archaeology of the Ballona Lagoon. Analysis of the cultural materials excavated at LAN-211/H, will provide vital data pertaining to our understanding of Native American lifeways in the Ballona specifically and in the region in general. The early-historical-period

component from LAN-211/H will be an important facet of our research and will provide data about the archaeology of the poorly understood southern California region; it will also provide data about an underrepresented part of the region's history.

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APPENDIX D.iii:
SUMMARY OF REMEDIAL ACTIVITIES IN AREA D2 OF PLAYA VISTA SITE, CDM, APRIL 28, 2008.

CDM

Memorandum

To: *Marc Huffman, Playa Vista*

From: *Michele Zych, P.G. 6741, CDM*

Date: *April 28, 2008*

Subject: *Summary of Remedial Activities in Area D2 of Playa Vista Site*

Per your request, the following is a summary of remedial activities performed at the former Firing Range, former Salvage Yard, and former Centinela ditch in Area D2 of the Playa Vista development.

Former Firing Range

The former Firing Range is located south of Bluff Creek Drive, within portions of Lots 75 and 76 of Proposed Vesting Tentative Tract Map No. 60110 (VTTM No. 60110). Groundwater and saturated soil concentrations currently exceed remediation criteria for volatile organic compounds on portions of these lots.

Lead contamination was found in unsaturated soil. In accordance with the Remediation Plan (RP) Addendum (CDM, 2005), soil containing lead above remediation levels was excavated in August 2005. Soil was initially excavated in the immediate vicinity of boring D-236 and the excavation extended laterally to borings D-330, D-331 and D-332 (Figure 1). Lead-impacted soil was detected at a depth of two to five feet below ground surface (bgs). Soil was excavated to approximately five to seven feet bgs. Excavation of lead-impacted soil continued until confirmation samples collected from the bottom and sidewalls of the excavated area were below the Site-specific background concentration for lead, in accordance with California Regional Water Quality Control Board, Los Angeles Region (RWQCB) guidelines (RWQCB, 1996) (i.e., 16 milligrams per Kilogram [mg/Kg]) (CDM, 2006).

Soil with lead contamination was also excavated at boring D-497 in August 2005. As with the excavation around D-236, soil removal continued in the vicinity of D-497 until lead concentrations in the confirmation samples from the bottom and sidewalls were below 16 mg/Kg, or until excavation could not continue due to physical obstruction (i.e., the presence of a concrete drainage channel located to the west). In total, 1,829 tons of soil were removed from the D-236 and D-497 excavations and transported in accordance with State regulations to Bradley Landfill, a licensed disposal facility, located in Sun Valley, California (CDM, 2006a).

Saturated-zone volatile organic compound (VOC) contamination in this area will be remediated using the dual-phase extraction (DPE) wells to be installed as part of implementing the groundwater RP and RP Addendum (CDM, 2004, 2005), once final RWQCB approval is received. The groundwater VOCs must be reduced to below remediation criteria in accordance with the RWQCB-issued Cleanup and Abatement Order (CAO) (RWQCB, 1998).

Former Salvage Yard

The former Salvage Yard is located south of Bluff Creek Drive, within portions of Lots 75 and 76 of Proposed VTTM No. 60110. Groundwater and unsaturated zone soil concentrations currently exceed remediation criteria on portions of these lots. These unsaturated zone soils fall within the anticipated zone of influence of the proposed remediation system and will be remediated using the DPE wells to be installed as part of implementing the RP and RP Addendum (CDM, 2004, 2005). The groundwater remediation is required to reduce contamination to below human health and resource remediation goals in accordance with the CAO.

Centinela Ditch

Between 1997 and 2001, Centinela ditch (Ditch) sediments were investigated. Based on the findings from these investigations, it was determined that cadmium, lead, and polychlorinated biphenyl (PCB)-1254 were present in the samples. Based on these results, it was recommended that sediments within the Ditch in areas where exceedances were reported should be removed prior to road construction activities (ENSR, 1997).

In August 2005, the section of the Ditch near former Building 22 where PCB-1254 and lead were previously reported at concentrations exceeding remediation criteria, was excavated (CDM, 2006b). Following excavation, four confirmation samples were collected and analyzed for metals and PCBs. Metals concentrations were below background concentrations and PCBs were not detected. Therefore, the removal activities were considered complete. In September 2005, the section of the Ditch near former Building 45 where cadmium was previously reported at concentrations exceeding remediation criteria, was excavated (CDM, 2006b). Five confirmation samples were collected after excavating and analyzed for metals, total petroleum hydrocarbons – carbon chain (TPH-cc), and VOCs. Except for lead, all confirmation sample results were below remediation criteria and background levels. Lead was detected in the westernmost confirmation sample at a concentration of 17 milligrams per Kilogram (mg/Kg), which was just slightly higher than the background concentration of 16 mg/Kg. As a result, additional excavation and confirmation sampling was performed in the area of the elevated lead detection. Removal activities were considered complete once confirmation sample results demonstrated that residual lead concentrations were less than background levels.

In total, 232.84 tons of sediments were excavated from the Ditch in the vicinity of former Building 22, and 309.24 tons of sediments were excavated from the Ditch in the vicinity of former Building 45. Excavated soil was transported under non-hazardous manifests for off-Site disposal at Bradley Landfill, located in Sun Valley, California (CDM, 2006b).

These sediments had to be removed for human health protection issues. Furthermore, they could not be buried in place due to the risk of contamination percolating to the relatively shallow groundwater below.

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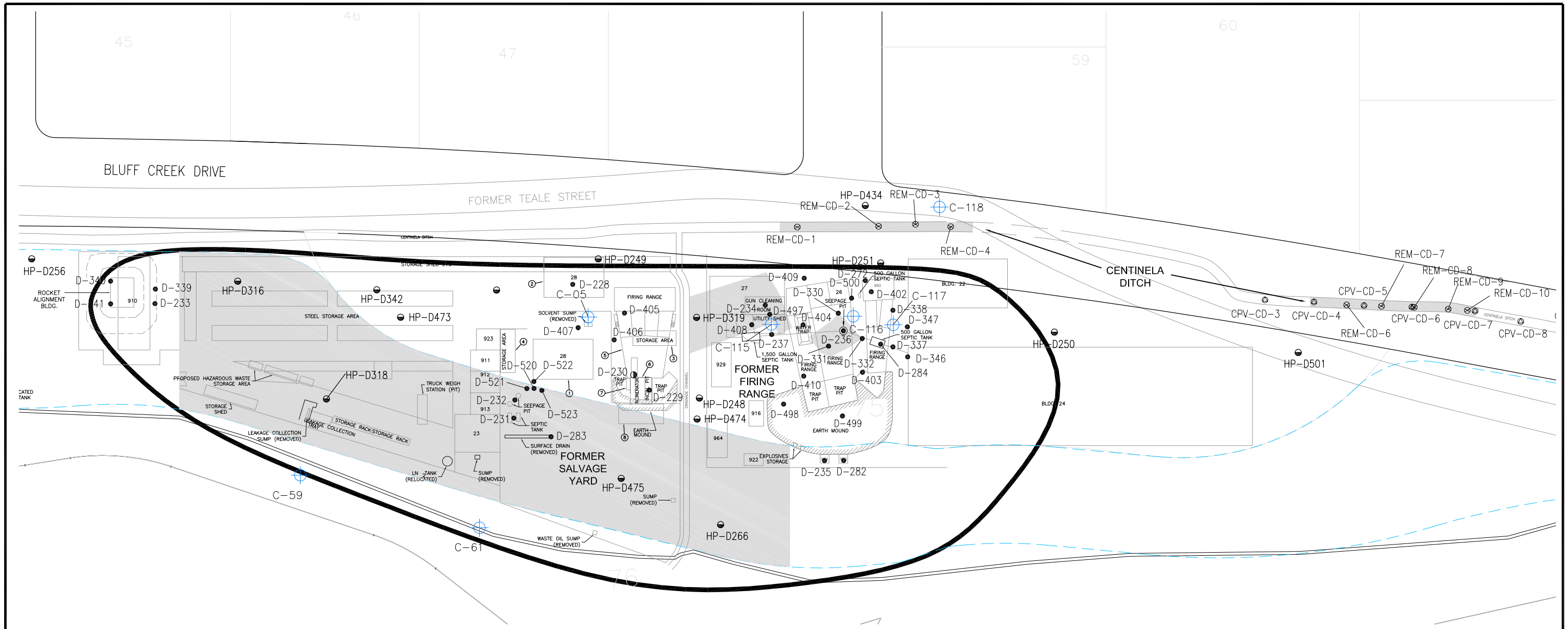
cc: Dave Chernik, Playa Vista



NOTES

1. ORIGINAL LOCATION OF BUILDING 28 (REMOVED)
2. RELOCATED BUILDING 28 (REMOVED)
3. ORIGINAL LOCATION OF STORAGE AREA (REMOVED)
4. RELOCATED LOCATION OF STORAGE AREA
5. FIRING RANGE (REMOVED)
6. INCINERATOR AND INCINERATOR PIT (REMOVED)
7. 1,000 GALLON UST
8. SHED (REMOVED)

LEGEND

- LIMITS OF FORMER EXCAVATION
- REMOVED STRUCTURES
- LIMITS OF RIPARIAN CORRIDOR
- ARCHEOLOGICAL ZONE – LAN 211 (RECOVERY PLAN)
- SOIL BORING LOCATION (CDM, 2002; 2003)
- HYDROPUNCH LOCATION (CDM, 2002; 2003)
- SOIL BORING AND HYDROPUNCH LOCATION (CDM, 2002; 2003)
- MONITORING WELL SCREENED IN THE BELLFLOWER AQUITARD
- CONFIRMATION SOIL SAMPLE LOCATION (CDM, 2006)
- SOIL SEDIMENT SAMPLE LOCATION (EEC, 2001)

1" = 50'
25 0 50

DATE: Feb 14, 2008 12:19pm XREFS:
DWG: N:\10610\Grading Oversight\PLAYA_Fig-01_EXCAVATION MAP 02-14-08.dwg

CDM

PLAYA VISTA
AREA D2
Recent Soil Remediation Excavations

Figure 1

APPENDIX D.iv:
THE VILLAGE AT PLAYA VISTA RIPARIAN CORRIDOR BIOLOGICAL RESOURCES REPORT, PSOMAS, APRIL 2008

THE VILLAGE AT PLAYA VISTA RIPARIAN CORRIDOR BIOLOGICAL RESOURCES REPORT

Prepared for:

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Project No. 2PCC010200

April 2008

TABLE OF CONTENTS

1.0 Introduction 1-1

2.0 Study Methods 2-1

2.1 Literature Review 2-1
2.2 2007 Field Survey Methods 2-1
2.2.1 Plant Survey Methods 2-1
2.2.2 Wildlife Survey Methods 2-2

3.0 Biological Resources of Riparian Corridor Area 3-1

3.1 November 2002 Conditions 3-1
3.2 September 2004 Conditions 3-2
3.3 Current (2008) Conditions 3-3
3.3.1 Riparian Corridor 3-3
3.3.2 Wildlife Usage 3-4
3.3.3 Bluff Restoration 3-6
3.3.4 Habitat Function and Value 3-6

4.0 Conclusions 4-1

5.0 References 5-1

TABLES

Table 3-1 Wildlife Species Observed in the Riparian Corridor 3-5
Table 3-2 Additional Bird Species Expected to Use the Riparian Corridor 3-8

FIGURES

Figure 1 Regional Location Map 1-2
Figure 2 The Village Location Map 1-3
Figure 3 The Village Map 1-4
Figure 4 The Village Riparian Corridor 1-5

LIST OF ABBREVIATIONS

BLM	Bureau of Land Management
CEQA	California Environmental Quality Act
CDFG	California Department of Fish and Game
CNPS	California Native Plant Society
CNDDB	California Natural Diversity Database
DEIR	Draft Environmental Impact Report
ESA	Endangered Species Act
GIS	Geographic Information System
GPS	Global Positioning System
HMMP	Habitat Mitigation and Monitoring Plan for Ballona Wetlands Freshwater Wetland System
MSL	mean sea level
OHWM	ordinary high water mark
USACOE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

1.0 Introduction

The proposed Village at Playa Vista Project (the Proposed Project) is located in the City of Los Angeles, Los Angeles County, California (Figure 1, *Regional Location Map*); west of the 405 freeway, and north of Los Angeles International Airport (Figure 2, *The Village Location Map*). The Proposed Project site can be found on the Venice, California U.S. Geological Survey (USGS) 7.5 minute Topographic Quadrangle Map (1964, photorevised 1981). The Proposed Project site consists of approximately 111 acres (Figure 3, *The Village Map*) bounded by Jefferson Boulevard to the north, Campus Center Drive and Westlawn Avenue to the east, the Westchester Bluffs (the Bluffs) and Millennium Avenue to the south, and Dawn Creek Street to the west.

A 6.7-acre riparian area (Riparian Corridor) and a 5-acre restoration of the Westchester Bluffs (Bluffs) contiguous to the Riparian Corridor were included as the Habitat Creation/Restoration Component of the Proposed Project. The Riparian Corridor is located south of the Urban Development Component of the Proposed Project, and completes a riparian corridor that was initiated to the east and west of the Proposed Project as part of the First Phase of the Playa Vista Project. The portion of the riparian corridor within the Proposed Project is approximately 2,600 feet long, approximately 1,850 feet of which are located within the boundaries of the archaeological zones, CA-LAN-62 and CA-LAN-211/H (Figure 4, *The Village Riparian Corridor*).

This biological resources report has been prepared in response to the opinion of the California Court of Appeal, Second Appellate District, in *City of Santa Monica v. City of Los Angeles [Playa Capital Co., LLP, Real Party in Interest]*, No. B189630 (Cal. Ct. App., opinion filed Sept. 13, 2007). In connection with the Court of Appeal's direction to discuss the "preservation in place" of archaeological resources, it has been suggested that the archaeological resources that were encountered in the Riparian Corridor site be returned, the area refilled, and the Riparian Corridor relocated outside of the boundaries of the archaeological sites. The purpose of this report is to assess the functions and values of the existing biological resources of the current Riparian Corridor within the Proposed Project and compare these to those functions and values if the Riparian Corridor within the Proposed Project were to be removed or relocated in response to the Court of Appeal decision. To ascertain what biological resource functions and values may have been like in the absence of the Proposed Project, Psomas biologists conducted a review of existing literature to determine what biological resources were observed and documented within the area of the Riparian Corridor in November 2002 and September 2004, and determined current existing conditions through direct observation in a series of field surveys occurring in November 2007 and March, and April 2008.

Legend

County Boundary

N

0 5 10 Miles

Regional Location Map

PSOMAS

Figure 1

COSTA MESA 2\Projects M:\2PCC010200\Riparian Alternatives Analysis\GIS\Tasks\Figures\apr-mxd\Fig 1_Regional_Map.mxd

The Village at Playa Vista
Riparian Corridor Biological Resources Report

Legend

The Village Project Boundary

N

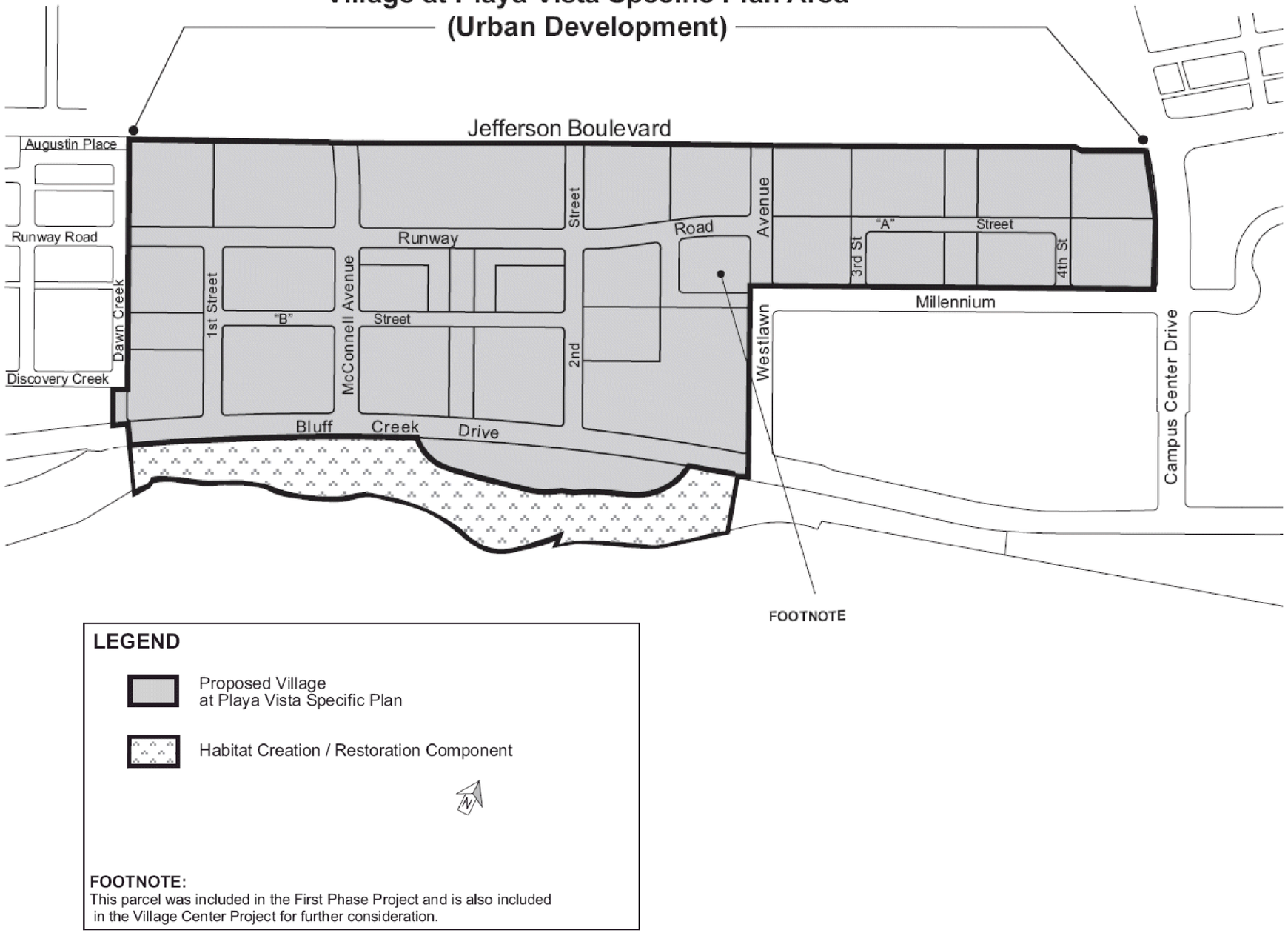
0 1,000 2,000 4,000
Feet

The Village Location Map

PSOMAS

Figure 2

(\COSTAMESA2\Projects\) M:\2PCC010200\Riparian Alternatives Analysis\GIS\Tasks\Figures\apr-mxd\Fig 2 Location Map.mxd



Source: The Village at Playa Vista DEIR
March 2003, Appendix G-2

COSTA MESA 2\Projects M:\2PCC010200\Riparian Alternatives Analysis\GIS\Tasks\Figures\apr-mxd\Fig 3 Village Map.mxd

The Village Map

PSOMAS

Figure 3

(\COSTAMESA2\Projects\) M:\2PCC010200\Riparian Alternatives Analysis\GIS\Tasks\Figures\apr-mxd\Fig 4 Riparian Corridor.mxd

The Village at Playa Vista
Riparian Corridor Biological Resources Report

Legend

The Village Project Boundary

Riparian Channel and Bluff Slopes

Phase 2 - Bluff Slopes

Phase 2 - Riparian Corridor

Source of aerial photography USGS 2006

N

0 200 400 800 Feet

The Village Riparian Corridor

PSOMAS

Figure 4

2.0 Study Methods

To prepare this report, Psomas reviewed published and unpublished literature related to the Proposed Project, prior field surveys, and current and historic aerial photos. In addition, field surveys were conducted to assess current existing conditions within the Riparian Corridor.

2.1 Literature Review

Psomas reviewed the following project-related documents:

- Biological Resources of the Proposed Village at Playa Vista Project (Psomas 2003)
- Village at Playa Vista DEIR, Section IV.D (City of Los Angeles 2003)
- Habitat Mitigation and Monitoring Plan for Ballona Wetlands Freshwater Wetland System (HMMP) (Psomas *et. al.* 1995)

Psomas also reviewed numerous environmental clearance memos prepared by Psomas for Playa Capital Company, LLC and several biological survey reports prepared prior to 2001 in support of the Playa Vista Project (Keane Biological Consulting 1996, 1998, Erikson 2000).

Psomas reviewed photographs of the Proposed Project site, including:

- historic aerial photos, current ortho-rectified,
- 1 inch = 200 feet aerial photos,
- oblique aerial photos,
- current site photos, and
- site photos from previous biological surveys.

2.2 2007 Field Survey Methods

Psomas undertook field surveys to determine the existing conditions and wildlife use within the Riparian Corridor and the adjoining habitat areas. Psomas biologist Amanda Weinberg surveyed the existing Riparian Corridor on November 8, 2007, March 27, and April 16, 2008 to perform a habitat assessment, vegetation survey, and wildlife surveys. Psomas biologist Gregg Miller surveyed the existing Riparian Corridor on November 27, 2007 January 3, March 19, and March 26, 2008 to perform a habitat assessment and wildlife surveys. In each instance, the entire Riparian Corridor from Dawn Creek Street to Westlawn Avenue was surveyed on foot. Additionally, the riparian areas east of Westlawn Avenue and west of Dawn Creek Street and the freshwater marsh west of Lincoln Avenue were surveyed.

2.2.1 Plant Survey Methods

All plant species encountered during the field survey were identified by visual characteristic and morphology and were recorded. Plant field guides and photographs were used to assist with identification of plant species during the field surveys. Unusual and less familiar plants were

later identified using taxonomical guides. Taxonomic nomenclature used in this report follows the California Native Plant Society and The Jepson Manual (Hickman 1993).

The plant communities within the study area were identified in the field. Generally, classifications of habitat types or vegetation communities were based on *A Manual of California Vegetation* (Sawyer and Keeler-Wolf 1995). Plant communities were also characterized in terms of the communities in the HMMP (Psomas *et. al.* 1995). Aerial photographs were used to assist in the delineation of plant community boundaries.

2.2.2 Wildlife Survey Methods

All wildlife species encountered during field surveys were identified and recorded. Wildlife were detected and identified using the following methods: sight, scat, tracks, burrows, nests, and vocalizations. Binoculars were used to aid in the identification of observed wildlife. In addition, field guides and photographs were used to assist in identifying wildlife species during the field surveys. Photographs were taken to document conditions observed within the existing Riparian Corridor.

3.0 Biological Resources of Riparian Corridor Area

3.1 November 2002 Conditions

In 2002, the Proposed Project site was vacant except for abandoned manufacturing plant buildings and some remnants of past manufacturing and airstrip uses of the former Hughes Aircraft Company/McDonnell Douglas Helicopter plant. Building 22 was a warehouse used for storage and Building 45 was used occasionally for filming and other activities. Other small buildings, such as shed, minor storage structures, and construction trailers associated with development of the adjacent Playa Vista First Phase Project also existed in the former Salvage Yard area of the Proposed Project site (Psomas 2003).

The Proposed Project site was used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, including stockpiling excavated soils, erosion control measures, temporary stormwater detention, rock crushing and stockpiling, and equipment staging and parking. A roadway that bisects the site (Runway Road) was also under construction as part of the adjacent Playa Vista First Phase Project, to connect the east and west ends of the Playa Vista First Phase Project site. Some paved areas existed along the alignment of Teale Street (a private street) and along a portion of the area southerly of the existing buildings and sheds to the Bluffs (Psomas 2003).

In November 2002, the area of the future 6.7-acre Riparian Corridor consisted of a flat portion of property located between Teale Street (and the future Bluff Creek Drive) and the base of the Bluffs. The Centinela Ditch was located south of Teale Street and north of the Riparian Corridor area (Psomas 2003). Approximately 6.5 acres of the future Riparian Corridor area consisted of abandoned buildings and deteriorating pavement with sparse ruderal vegetation. Ruderal vegetation in this section of the future Riparian Corridor area was growing primarily along edges of parking lots and in unmaintained sections of pavement (Psomas 2003). Common species within the ruderal community in the Proposed Project site generally included castor bean (*Ricinis communis*), pampas grass (*Cortaderia selloana*), garland chrysanthemum (*Chrysanthemum coronarium*), ripgut brome (*Bromus diandrus*), filaree (*Erodium* spp.), bristly ox-tongue (*Picris echioides*), Bermuda grass (*Cynodon dactylon*), Bermuda buttercup (also known as oxalis) (*Oxalis pes-caprae*), and tree tobacco (*Nicotiana glauca*) (Psomas 2003). This area provided very poor quality habitat due to its highly disturbed character, almost complete absence of vegetation, and dominance of exotic species. Also, in November 2002, the remaining 0.2 acres of the future Riparian Corridor area consisted of the Centinela Ditch which contained standing water during most months of the year. Banks of the ditch were dominated almost entirely by iceplant (*Carpobrotus edulis*), with castor bean and pampas grass occurring in a small clump near Building 22. The Centinela Ditch was a remnant of the historic Centinela Creek, which had become highly degraded over at least a century of human alterations and occupation (Psomas 2003). Due to the dominance of exotic species, small size, disturbed character, and lack of structural diversity, the Centinela Ditch provided poor quality habitat in November 2002.

No federal or state threatened or endangered plant or wildlife species were recorded in the Riparian Corridor area in 2002 or during surveys conducted prior to 2002. No special status plant species were observed in the Riparian Corridor area in 2002 or during surveys conducted

prior to 2002. One wildlife species, snowy egret (*Egretta thula*), whose nesting (rookery) sites are listed as sensitive by CDFG, was observed in the Riparian Corridor area in 2002 (Psomas 2003), however, no snowy egret rookeries were observed. Only common wildlife species were observed in the area. Wildlife species observed in 2002 foraging in ruderal vegetation in the Proposed Project site included feral pigeon (*Columba livia*), mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), house finch (*Carpodacus mexicanus*), house sparrow (*Passer domesticus*), and pocket gopher (*Thomomys bottae*). Killdeer (*Charadrius vociferous*) were recorded as having been observed in association with bare ground and sparsely vegetated areas within the disturbed areas of the Proposed Project site (Psomas 2003). Wildlife species recorded as having been observed in association with Centinela Ditch included Pacific treefrog (*Hyla regilla*), mallard (*Anas platyrynchos*), American coot (*Fulica americana*), common snipe (*Gallinago gallinago*), and snowy egret. Tracks of opossum (*Didelphis virginiana*) and raccoon (*Procyon lotor*) were observed in mud adjacent to the ditch (Psomas 2003).

Habitat recorded as having been observed in November 2002 could be categorized as very degraded and of virtually no value to wildlife. Due to the very degraded quality of the habitat available onsite, typical functions associated with habitat (including nesting, cover for security from predation, food sources, roosting sites, and connectivity to other habitat areas) would have been minimal. Based on these findings, it was concluded that the habitat-related functions and values of the Riparian Corridor were poor in November 2002.

3.2 September 2004 Conditions

In general, conditions in the Riparian Corridor area in September 2004 were the same as conditions in November 2002. The area contained paved areas, buildings, parking lots, and culverts. No buildings or pavement had been removed, and no grading or planting efforts had been initiated for the Riparian Corridor or the Bluffs in the Proposed Project area. However, in September 2004, the western portion of Centinela Ditch near the Playa Vista First Phase Project residential development had been filled, as part of an approved Erosion Control Plan.

The Proposed Project site was still vacant except for the former plant site buildings, with remnants of past manufacturing and airstrip uses including Building 22 and Building 45. The Proposed Project site continued to be used for the stockpiling of excavated soils, erosion control measures, temporary stormwater detention, rock crushing and stockpiling, and equipment staging and parking. The 6.5 acres of the future Riparian Corridor area still consisted of abandoned buildings and deteriorating pavement with sparse ruderal vegetation which was growing primarily along edges of parking lots and in unmaintained sections of pavement. In 2004, this area provided very poor quality wildlife habitat due to its highly disturbed character, almost complete absence of vegetation, and the dominance of exotic species. As in November 2002, the habitat in September 2004 could be categorized as very degraded and of virtually no value to wildlife. Due to the highly degraded quality of the habitat onsite, typical functions associated with habitat (including nesting, cover for security from predation, food sources, roosting sites, and connectivity to other habitat areas) would have been minimal. As with November 2002, the habitat-related functions and values of the Riparian Corridor were still poor in September 2004.

3.3 Current (2008) Conditions

By the spring of 2008, conditions at the Proposed Project site and in particular the Riparian Corridor had changed markedly from November 2002 and September 2004. Those differences are described below.

3.3.1 Riparian Corridor

By 2007, the 6.7-acre Riparian Corridor was constructed and many new native plant species had been introduced into the Riparian Corridor. The Riparian Corridor was planted with native vegetation in the spring of 2007 in accordance with the HMMP (Psomas *et. al*. 1995). These plantings represent three riparian plant communities: willow scrub woodlands, mixed riparian woodlands, and freshwater marsh. As the vegetation in the Riparian Corridor continues to mature, these communities will blend into one another. These plant communities are briefly described in Section 3.3.1.1, below. The construction and planting of the 6.7-acre Riparian Corridor in the Proposed Project area completes a continuous 25-acre riparian corridor along the base of the Bluffs. The 25-acre riparian corridor ultimately feeds into the freshwater marsh (west of Lincoln Boulevard and south of Jefferson Boulevard), thus establishing a 51-acre Freshwater Wetland System. The final component of this system is a box culvert connection underneath Lincoln Boulevard, which was completed in April of 2008.

The native riparian plants were planted in clusters along the slopes of the Riparian Corridor to mimic natural communities. The species planted include narrow-leaved willow (sandbar willow) (*Salix exigua*), black willow (Goodding's black willow) (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), and mulefat (*Baccharis salicifolia*). Along the upper slopes of the Riparian Corridor, individual California sycamore (*Platanus racemosa*) and Fremont cottonwood (*Populus fremontii*) trees were planted every 20 to 40 feet. There was bare ground with some exotic plant species between the clusters of native plants.

During field surveys in November 2007, and January, March, and April 2008, Psomas biologists observed the native riparian plants to be healthy and growing well. Within the 6.7 acre Riparian Corridor area analyzed, the percent coverage by native riparian plants and emergent vegetation was up to 65 percent. Some exotic plants also were observed to be scattered throughout the Riparian Corridor. Most areas of the bottom of the Riparian Corridor channel bed contained 100 percent canopy cover of cattails (*Typha* sp.) while some areas contained 100 percent canopy cover of exotic clovers. In some areas, cattails had been removed from the Riparian Corridor as part of vector control efforts.

3.3.1.1 Plant Communities

3.3.1.1.1 Willow Scrub

The willow species include narrow-leaved willow, black willow, red willow, and arroyo willow. Usually one species of willow is dominant within each cluster, with narrow-leaved willow dominating more frequently than the other willow species. Other riparian plants such as California wild rose (*Rosa californica*) and California blackberry (*Rubus ursinus*) were found within these clusters. The willow vegetation association found within Riparian Corridor fits the

narrowleaf willow series as described by *A Manual of California Vegetation* (Sawyer and Keeler-Wolf 1995) which describes the narrowleaf willow series as having narrowleaf willow as either the sole shrub in the canopy or the dominant shrub with Fremont cottonwood, white alder (*Alnus rhombifolia*), and/or other willows present. The canopy is continuous and the ground layer is variable. Narrowleaf willow series thickets typically naturally occur along the margins of streams and rivers that are continually disturbed by flooding and deposition.

3.3.1.1.2 Mixed Riparian Woodland

The Mixed Riparian community fits an ecotonal mix of three *Manual of California Vegetation* (Sawyer and Keeler-Wolf 1995) series: California sycamore, mule fat, and Fremont cottonwood. The California sycamore series is dominated by sycamore or sycamore is co-dominant with Fremont cottonwood, with willows and mulefat present. The mule fat series as having mule fat the sole or dominant shrub in the canopy and arroyo willow and/or narrowleaf willow may be present. Shrubs are usually less than 4 meters tall and the canopy is usually continuous. The ground layer is sparse. The Fremont cottonwood series is usually dominated by Fremont cottonwood or cottonwood may mix with other trees.

3.3.1.1.3 Freshwater Marsh

A Manual of California Vegetation (Sawyer and Keeler-Wolff 1995) classifies this species assemblage among their cattail series. *Preliminary Descriptions of the Terrestrial Communities of California* (Holland 1986) classifies this species assemblage as coast and valley freshwater marsh (52410). Narrow-leaved cattail (*Typha angustifolia*) is the dominant species found within this plant community within the biological survey area. Other species observed in the freshwater marsh habitat within the Riparian Corridor include bulrush (*Scirpus* sp.), southwestern spinyrush (*Juncus acutus*), willow (*Salix* sp.) and willow herb.

3.3.2 Wildlife Usage

Based on observations recorded during November 2007, and January, March, and April 2008 field surveys, numerous wildlife species already use the Riparian Corridor. These species are listed in Table 3-1, *Wildlife Species Observed in the Riparian Corridor*.

Table 3-1
Wildlife Species Observed in the Riparian Corridor

Scientific Name	Common Name
Invertebrates	
Armadillidium vulgare	common pill bug
Porcellio laevis	dooryard sow bug
Procambarus clarkii	red crayfish
Helix aspersa	brown garden snail
Apis mellifera	honeybee
Bombus sp.	bumblebee
Forficula auricularia	European earwig
Hippodamia convergens	convergent ladybeetle
Vanessa cardui	painted lady
Pieris rapae	cabbage white
Nymphalis antiopa	mourning cloak
Latrodectus hespersus	western black widow
Lumbricus terrestris	common earthworm
Amphibians	
Hyla regilla	Pacific tree frog
Reptiles	
Sceloporus occidentalis	Western fence lizard
Uta stansburiana	Common side blotched lizard
Birds	
Anas strepera	gadwall
Anas platyrhynchos	mallard
Anas cyanoptera	cinnamon teal
Anas clypeata	northern shoveler
Anas crecca	green-winged teal
Mergus serrator	red-breasted merganser
Oxyura jamaicensis	ruddy duck
Podilymbus podiceps	pied-billed grebe
Ardea herodias	great blue heron
Ardea alba	great egret
Egretta thula	snowy egret
Butorides virescens	green heron
Buteo lineatus	red-shouldered hawk
Buteo jamaicensis	red-tailed hawk
Falco sparverius	American kestrel
Charadrius vociferus	killdeer
Fulica americana	American coot
Himantopus mexicanus	black-necked stilt
Limnodromus griseus	short-billed dowitcher
Gallinago delicata	Wilson's snipe.
Columba livia	rock pigeon
Zenaida macroura	mourning dove
Calypte anna	Anna’s hummingbird
Selasphorus sasin	Allen’s hummingbird
Sayornis nigricans	black phoebe
Myiarchus cinerascens	ash-throated flycatcher

Scientific Name	Common Name
Tyrannus vociferans	Cassin's kingbird
Tyrannus verticalis	western kingbird
Corvus brachyrhynchos	American crow
Stelgidopteryx serripennis	northern rough-winged swallow
Petrochelidon pyrrhonota	cliff swallow
Hirundo rustica	barn swallow
Psaltriparus minimus	common bushtit
Thyromanes bewickii	Bewick's wren
Mimus polyglottos	northern mockingbird
Sturnus vulgaris	European starling
Dendroica coronata	yellow-rumped warbler
Geothlypis trichas	common yellowthroat
Anthus rubescens	American pipit
Pipilo crissalis	California towhee
Melospiza melodia	song sparrow
Zonotrichia leucophrys	white-crowned sparrow
Agelaius phoeniceus	red-winged blackbird
Carpodacus mexicanus	house finch
Carduelis psaltria	lesser goldfinch
Passer domesticus	house sparrow
Mammals	
Didelphis virginiana	Virginia opossum
Spermophilus beecheyi	California ground squirrel
Thomomys bottae	pocket gopher
Vulpes vulpes	Red fox
Procyon lotor	northern raccoon

3.3.3 Bluff Restoration

The Habitat Creation/Restoration Component of the HMMP also included the restoration of a 5-acre section of the Bluffs located immediately south and contiguous to the Riparian Corridor. This 5-acre area previously was populated with a high percentage of non-native vegetation, but was enhanced in 2007 through the introduction of native vegetation, consisting of coastal sage scrub community plant species that increases the Proposed Project area's habitat value. The bluff restoration has been completed. An additional 40.7 acres of the Bluffs has been previously restored with coastal sage scrub habitat to the west and east of the Proposed Project, contiguous to the Riparian Corridor within the First Phase Project.

3.3.4 Habitat Function and Value

Observations in November 2007 and January, March and April 2008 indicate the Riparian Corridor already provides beneficial native habitat. In particular, in those portions of the Riparian Corridor where growth of newly installed native plants has accelerated, habitat is of high quality and of high value to wildlife. As the new native plants continue to grow and propagate, habitat values within the Riparian Corridor will continue to improve. When considered as a part of the now-continuous, uninterrupted wildlife habitat area that extends from Centinela Avenue on the east to the 51-acre Freshwater Marsh on the west and includes the 5-acre Bluff habitat area to the south, the Riparian Corridor is an important component of this

wildlife corridor by increasing habitat size and reducing the ratio of habitat edge to habitat interior. As part of the larger wildlife habitat area, the existing Riparian Corridor is providing useful cover for wildlife species and is necessary to connect the entire vegetation and habitat corridor along the base of the Bluffs from near Centinela Avenue on the east to Lincoln Boulevard on the west.

As shown in Table 3-1, a total of 46 bird species were observed in the surveys using the Riparian Corridor. This includes all of the "primary candidates" for the Initial Performance Standards (1.5 years after planting) and the Interim or Short-Term Performance Standards (2.5 and 3.5 years after planting) as identified in the HMMP: mourning dove, Anna's hummingbird, Allen's hummingbird, common bushtit, common yellowthroat, California towhee, song sparrow, red-winged blackbird, house finch and lesser goldfinch. Two species, common yellowthroat and red-winged blackbird, have been observed breeding in the Riparian Corridor, which meets the HMMP Initial Performance Standards for 1.5 years after planting.

Based on observations made and data reviewed regarding the 26.1-acre Fresh Water Marsh, which has been monitored since February 2003, it is expected that a number of bird species locally present, but not observed in the Psomas surveys of the Riparian Corridor documented in this report, are already using the corridor. Over 190 bird species have been regularly recorded using the marsh (Ballona Wetlands Conservancy 2008). Approximately 43 species that now occur at the marsh, which were not observed in Psomas' survey of the Riparian Corridor, can reasonably be expected to use habitat present in the Riparian Corridor, with such usage increasing as the vegetation grows and the habitats mature. These species are shown in Table 3-2, *Additional Bird Species Expected to Use the Riparian Corridor*.

Table 3-2
Additional Bird Species Expected to Use the Riparian Corridor

Scientific Name	Common Name
Aix sponsa	wood duck
Anas americana	American wigeon
Anas discors	blue-winged teal
Anas acuta	northern pintail
Botaurus lentiginosus	American bittern
Ixobrychus exilis	least bittern
Nycticorax nycticorax	black-crowned night-heron
Elanus leucurus	white-tailed kite
Accipiter cooperii	Cooper's hawk
Rallus limicola	Virginia rail
Porzana carolina	sora
Gallinula chloropus	common moorhen
Actitis macularius	spotted sandpiper
Megaceryle alcyon	belted kingfisher
Picoides nuttallii	Nuttall's woodpecker
Colaptes auratus	northern flicker
Contopus sordidulus	western wood-pewee
Empidonax traillii	willow flycatcher
Empidonax hammondii	Hammond's flycatcher
Empidonax wrightii	gray flycatcher
Empidonax oberholseri	dusky flycatcher
Empidonax difficilis	pacific-slope flycatcher
Vireo gilvus	warbling vireo
Tachycineta bicolor	tree swallow
Tachycineta thalassina	violet-green swallow
Riparia riparia	bank swallow
Troglodytes aedon	house wren
Cistothorus palustris	marsh wren
Regulus calendula	ruby-crowned kinglet
Vermivora celata	orange-crowned warbler
Vermivora ruficapilla	Nashville warbler
Dendroica petechia	yellow warbler
Dendroica nigrescens	black-throated gray warbler
Dendroica townsendi	Townsend's warbler
Dendroica palmarum	palm warbler
Dendroica striata	blackpoll warbler
Wilsonia pusilla	Wilson's warbler
Pipilo maculatus	spotted towhee
Passerculus sandwichensis	savannah sparrow
Passerella iliaca	fox sparrow
Melospiza lincolnii	Lincoln's sparrow
Zonotrichia atricapilla	golden-crowned sparrow
Molothrus ater	brown-headed cowbird

The functions and values of any habitat (nesting habitat, cover for security from predation, food sources, roosting sites, and movement corridor and connectivity to other habitats) increase where habitat is continuous, complex, mature, and adjacent to other types of habitats. For example, riparian bird species use adjacent upland habitat including grass, shrub, and woodland habitats. These upland habitats are used for feeding, dispersal of juveniles and non-breeding adults, and as stopover sites during migration (RHJV 2004). Riparian areas are also used by bird species that primarily nest in upland areas. The riparian areas provide perch sites, nesting material, foraging areas, and water for birds from adjacent upland habitats (RHJV 2004). Amphibian species that breed in riparian areas often use underground burrows in adjacent upland areas during non-breeding and drought periods (RHJV 2004).

The riparian habitat also functions as an ecotonal area with the adjacent upland scrub habitat on the Bluff. This area provides additional habitat structure and complexity that would be lacking if the two habitats were separated. Because an ecotone brings together two different habitats and their respective faunas, it thus increases the diversity of the area. Ecotonal areas also increase animal abundance through the movement of materials or energy (in the form of food calories) between adjacent habitats and by providing access to spatially separated resources that are required for a species life history (Ries *et. al*. 2004). Ecotonal areas of native habitat types generally enhance diversity for wildlife (CalPIF 2004), and those that mimic natural ecotones usually enhance bird diversity (CalPIF 2004).

Many species utilize these ecotonal areas, and many scrub species of birds also use riparian habitat for roosting and perching when hunting for insect prey or for shade during hot days. Riparian bird species are often observed foraging in adjacent sage scrub habitats during spring months; this may be due to greater food resources in the adjacent sage scrub foliage (CalPIF 2004). Typical upland and scrub habitat birds such as American kestrel, mourning dove common bushtit, Cassin's kingbird, northern mockingbird, California towhee, and house finch will also use adjacent riparian habitat for foraging and nesting. The proximity and size of the upland scrub habitat, riparian habitat, and freshwater habitat increases the wildlife habitat value of each of the habitats by increasing the habitat diversity in the Proposed Project area.

The restoration of the Riparian Corridor and Bluff Area is consistent with the conservation goals, objectives, and restoration recommendations of *The Riparian Bird Conservation Plan* (RHJV 2004) which was developed by Partners in Flight in conjunction with the Point Reyes Bird Observatory, CDFG, USFWS, BLM, and the National Fish and Wildlife Foundation for California. Conservation goals and restoration recommendations of the *Riparian Bird Conservation Plan* include 1) protect and restore riparian areas with intact adjacent upland habitats, 2) ensure that patch size, configuration, and connectivity of restored riparian habitats adequately supports populations of riparian dependent species, 3) restore riparian corridor width, 4) plant a minimum of two or more species of native shrubs or trees in restoration areas, 5) increase shrub richness and shrub density by including plantings of understory species in restoration areas, and 6) plant vegetation in a mosaic with dense shrub patches interspersed with trees to achieve a semi-open canopy (RHJV 2004).

4.0 Conclusions

The Proposed Project's portion of the riparian corridor was constructed in 2005 and 2006, with planting completed in the spring of 2007. This represents the last 2,600 feet of planned riparian corridor along the base of the Westchester Bluffs that ends at the freshwater marsh. As the last phase of the 25-acre riparian corridor restoration, it fills in a 6.7 acre gap between the two previously planted and more mature portions of the riparian corridor, and hence provides a vital link in the form of continuously available habitat for wildlife species, increasing the habitat functions and values for the entire riparian corridor. The completion of the Riparian Corridor increases the overall wildlife habitat value of the riparian/bluff area by closing this habitat gap. The Riparian Corridor is part of a continuous, uninterrupted wildlife habitat area that extends from Centinela Avenue on the east to the 26.1-acre freshwater marsh on the west and includes the contiguous 45.7-acre Bluff habitat area to the south. As such, the Riparian Corridor adds to the wildlife habitat value of the area by providing a crucial contiguous wildlife corridor and increasing the habitat size while reducing the ratio of habitat edge to habitat interior.

In connection with the analysis of "preservation in place" of archaeological resources as of 2002 or 2004, it has been suggested that the archaeological resources that have been obtained through the data recovery program be returned to the Riparian Corridor site and the area refilled, and the Riparian Corridor relocated outside of the boundaries of the archaeological sites. If the existing Riparian Corridor was filled and removed, there would be a direct loss of the Riparian Corridor's existing 6.7 acres of riparian and wetland vegetation and its associated wildlife habitat value.

In addition, depending on how the east and west segments of the riparian corridor (in the First Phase project area) are connected through the Proposed Project area, a 2,600 feet gap in habitat between the two mature riparian strips would return, thus diminishing the function and value of the entire habitat area. For example, if the riparian corridor is reconnected using a underground box culvert in the Proposed Project segment, this would represent a permanent 2,600 foot discontinuity in the riparian corridor resulting in a fragmentation of the riparian corridor habitat, resulting in a substantial loss of habitat connectivity and potential for uninterrupted wildlife movement. This would reduce the size of the 25-acre riparian corridor by approximately 27 percent, resulting in a significant loss of biological and habitat diversity in the area.

Alternatively, if the riparian corridor is reconnected using a relocated Riparian Corridor in the Proposed Project area, relocation of the Riparian Corridor outside the boundaries of the archaeological sites and away from the Bluffs would isolate the Bluff Restoration area, fragment the overall habitat corridor, reduce habitat connectivity and wildlife movement, and diminish the value of that area to wildlife as well. The ecotonal benefits between the upland scrub and riparian habitats associated with the contiguity between the Riparian Corridor and the Bluffs would be eliminated. As a result, there would be a loss of biological and habitat diversity in the area. This loss, although still significant, would be somewhat reduced if the relocated Riparian Corridor were located adjacent to the preserved archaeological area rather than on the north side of Bluff Creek Drive.

In sum, maintaining the Riparian Corridor as designed and constructed is the superior biological option. All of the other options have less biological value.

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APPENDIX D.v:
SURFACE WATER QUALITY ASSESSMENT OF POTENTIAL ALIGNMENTS OF THE RIPARIAN CORRIDOR THROUGH THE VILLAGE AT PLAYA VISTA TO PRESERVE IN PLACE ARCHAEOLOGICAL RESOURCES, GEOSYNTEC, MAY 2008

SURFACE WATER QUALITY ASSESSMENT OF POTENTIAL ALIGNMENTS OF THE RIPARIAN CORRIDOR THROUGH THE VILLAGE AT PLAYA VISTA TO PRESERVE IN PLACE ARCHAEOLOGICAL RESOURCES

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Introduction

This analysis evaluates potential impacts to water quality of four options to realign or reconfigure the Riparian Corridor and Bluff Creek Drive as part of a discussion of preserving in place two archaeological areas located within the proposed Village at Playa Vista project (the Proposed Project). This analysis relies on information provided in more detail in: *"ANALYSIS FOR ALIGNMENTS OF THE RIPARIAN CORRIDOR THROUGH THE VILLAGE AT PLAYA VISTA TO PRESERVE IN PLACE ARCHAEOLOGICAL RESOURCES,"* PSOMAS, January 2008 (Psomas Report). Information on the four options assessed below is summarized in the Psomas Report.

The Riparian Corridor is a vegetated open channel located along the southern edge of the Proposed Project that is intended to provide flood control, improve water quality, and provide habitat for native species for the Proposed Project and the surrounding area. The Riparian Corridor includes a completely constructed channel with relatively shallow side slopes of a 3:1 ratio with some areas widened to as much as 100 feet across. There are three areas of the channel that due to space constraints consist of vertical concrete walls on each side with a natural vegetated bottom. Except for the few vertical concrete walls, the channel and the side slopes are fully landscaped with native willow scrub, mixed riparian, freshwater marsh, and upland species.

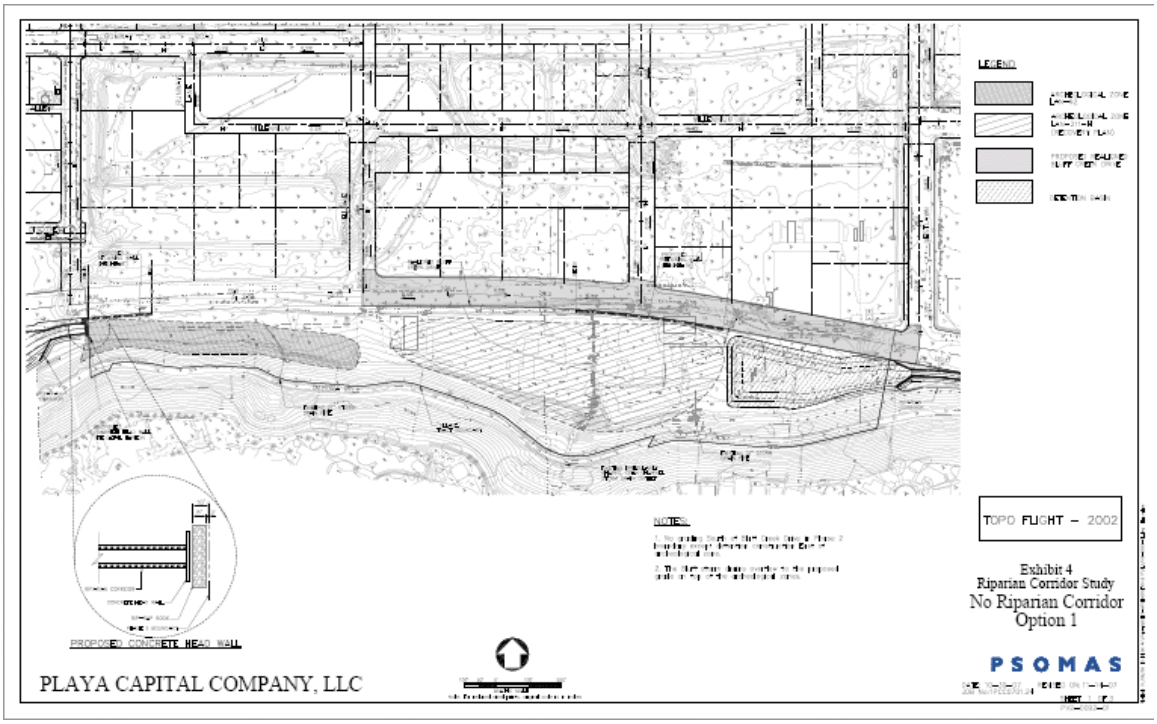
The Riparian Corridor is part of the 51.1 acre Freshwater Wetland System which includes the 26.1-acre Freshwater Marsh (FWM) on the west side of Lincoln Boulevard. This system serves multiple purposes, including flood control, storm water conveyance, water quality enhancement, aesthetic values, and habitat restoration. The Riparian Corridor within the Proposed Project is approximately 6.7 acres in area. The riparian corridor for both the Playa Vista First Phase Project and the Proposed Project is 25 acres in area, which includes the channel bottom, side slopes, and adjacent open areas. It is important to note that for water quality purposes, not all of this area serves a water quality enhancement function. An estimated 8.8 acres of the entire riparian corridor serves as a water quality enhancement/treatment area.

This analysis discusses the potential impacts on post-construction water quality of implementing the four options described in the Psomas Report through a qualitative analysis and discussion. Other options which were developed and determined to be not feasible in Section IV.G of the Psomas Report and therefore are not evaluated here.

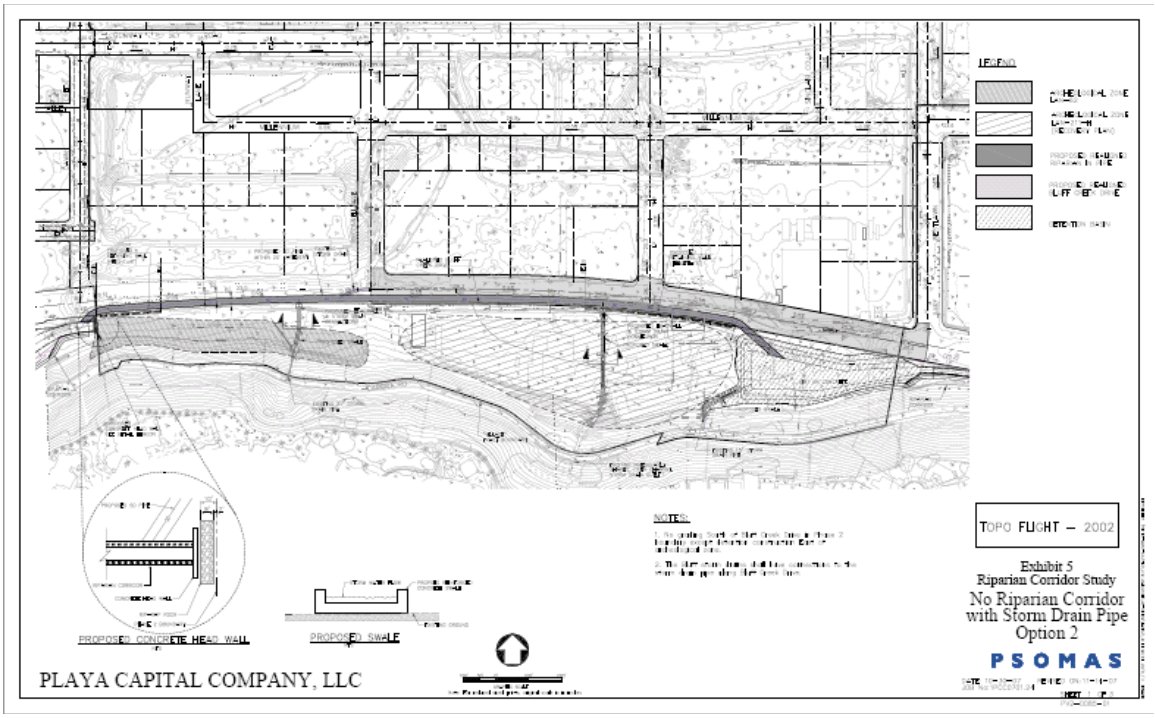
Options Evaluated for Water Quality

The four options which are described in more detail in Psomas Report include:

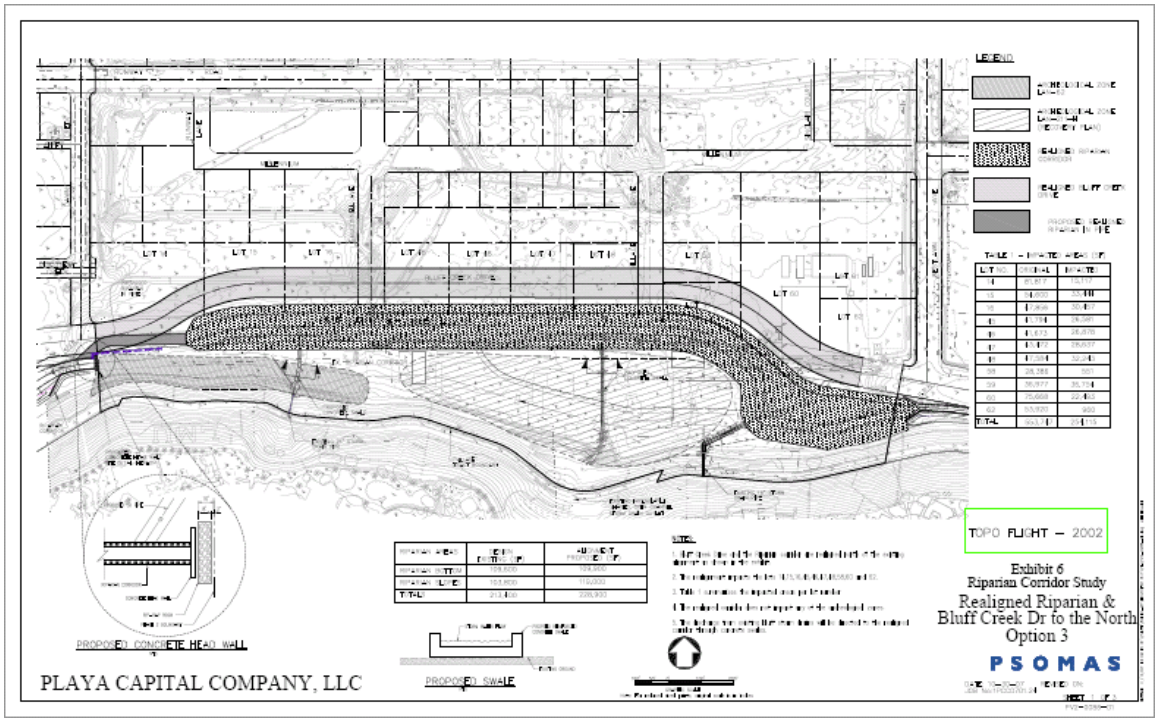
Option 1: Option 1 is indicated on Exhibit 4 of the Psomas Report and shown below. Under this option, Bluff Creek Drive would have been relocated slightly to the north out of the archaeological areas, and the Riparian Corridor would have been extended from the east as a widened open channel to approximately ten feet from the archaeological area. This option would, in essence, have waters flowing over the archaeological areas with the existing asphalt pavement left in place. In addition, existing subsurface contamination would remain in place as would subsurface structures (pipes, foundations, etc).



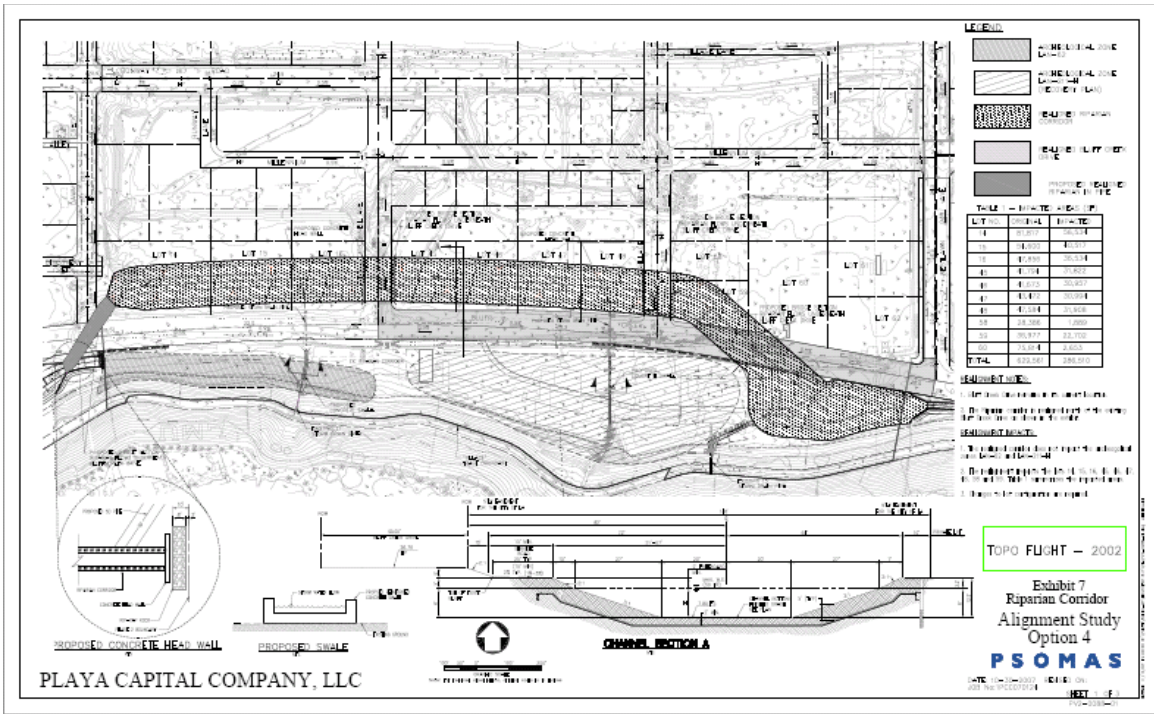
Option 2: Option 2 is indicated on Exhibit 5 of the Psomas Report and shown below. As in Option 1, Bluff Creek Drive would have been relocated slightly to the north out of the archaeological areas. The Riparian Corridor would have again been extended from the east end up to the archaeological areas. In this option a reinforced concrete box storm drain up to approximately 6 feet tall by 15 feet wide would have been installed within Bluff Creek Drive to route the flows from the Riparian Corridor on the east end to the Riparian Corridor on the west end. In addition, the storm drain structures discharging flows from the Westchester Bluffs south of the Riparian Corridor would have been routed around or through the archaeological areas. Therefore, in this case, most runoff flows would not pass over the archaeological areas; however, during storm events, drainage from the Bluffs outside the drainage structures would have flowed into the archaeological areas. This uncontrolled drainage could have caused erosion and ponding. The asphalt pavement would have been left in place. In addition, existing subsurface contamination would have remained in place as would subsurface structures (pipes, foundations, etc).



Option 3: This option is indicated on Exhibit 6 of the Psomas Report and shown below. In this option both Bluff Creek Drive and the Riparian Corridor would have been moved to the north in an effort to maintain the Riparian Corridor as an open channel to the maximum extent possible. To provide a continuous water course and eliminate flooding, a storm drain box structure toward the west end would be constructed to connect to the riparian corridor within the western portion of the First Phase project. In addition, the storm drainage structures from the Bluffs also would have been connected to the Riparian Corridor in a similar manner as for Option 2. Due to the realignment of the Riparian Corridor north, the length of the Riparian Corridor would have increased. This would require the Riparian Corridor to have a shallower slope to meet the existing flowline elevations at each end, and would have required that the Riparian Corridor be widened or deepened (or both) in order to carry the same amount of flow. As with Options 1 and 2, the existing pavement, contamination, and substructures would have been left in place.



Option 4: This option is indicated on Exhibit 7 of the Psomas Report and shown below. The option involves keeping the Bluff Creek Drive alignment in relatively the same location with a slight shift north to avoid the archaeological areas as in Options 1 and 2. The Riparian Corridor then would have been routed underneath the roadway alignments which would have been constructed as bridge sections. Drainage would have been routed to flow north of Bluff Creek Drive. A relatively short length of drainage box structure still would have been required at the west end under Dawn Creek Street. Due to the realignment of the Riparian Corridor to the north, the length of the Corridor increases. This would have required the Riparian Corridor to have a shallower slope to meet the existing flowline elevations at each end, and would have required that the Riparian Corridor be widened or deepened (or both) in order to carry the same amount of flow. As with Options 1, 2, and 3, the existing pavement, contamination, and substructures would have been left in place.



Water Quality Assessment

Each of these options potentially would have an effect on water quality. The major effects are the potential change in treatment area available for water quality enhancement of runoff flows from the Proposed Project area as well as off-site areas within the Playa Vista First Phase Project, as well as off-site areas from the south (drainages from Westchester Bluffs) and the asphalt left in place that would decompose over time. Table 1 below shows the potential changes in the water quality treatment areas comparing the existing as-built condition to each of the options evaluated. For assessment purposes on the overall change that would occur, the percentage of change within the Riparian Corridor in the Proposed Project area and the total riparian corridor area is shown. Treatment areas were assessed as the bottom area of the channel along with the side slopes up to a 1-foot elevation.

Table 1. Area of Water Quality Treatment Comparing Existing As-built Conditions to Options Evaluated.

Option	Acres of water quality treatment area within Proposed Project area	Acres of water quality area (entire riparian corridor)	Percent change in overall treatment area as compared to entire riparian corridor
Existing Riparian Corridor	2.8	8.8	NA
Option 1	0.7	6.7	-24%
Option 2	0.7	6.7	-24%
Option 3	3.1	9.1	3.4%
Option 4	2.8	8.8	0.0%

Source: Psomas

Options 1 and 2 would result in a significant reduction of almost 25 percent in the overall treatment area of the riparian corridor. Although it is difficult to predict the overall impact of this area reduction, it could be significant enough to be measured. The overall performance of the Freshwater Wetland System, including the riparian corridor, would not be expected to be significantly impacted, but more pollutants would reach the FWM due to the reduced treatment area, the left in place decaying pavement, and the potential for the soils underneath becoming exposed to stormwater.

Under Option 3, there is a slight increase in treatment area due to the longer channel length and width required to avoid the archaeological sites. However, a 3.4 percent increase in treatment area would not likely be significant enough to be measured. Under Option 4, the area of treatment would not increase and therefore treatment levels would not be affected. Options 3 and 4 also would likely increase pollution loading in storm water runoff due to the decaying pavement left in place and the potential exposure to underlying soils.

For all four options, the existing pavement over the archaeological areas would be left in place. If the pavement is left in place over the archaeological areas, the runoff from this area would be expected to have the same constituents and flows typical of runoff from impervious surfaces in urban areas. Additionally, this pavement would be old and would continue to deteriorate, assuming that it would not be re-paved. Therefore, additional pollutants from the decaying pavement (which could include Polycyclic Aromatic Hydrocarbons (PAHs) and heavy metals, depending on the composition of the asphalt) could flow into the Freshwater Wetland System. In addition, if decay were to occur such that underlying soils were exposed, there would the potential for the underlying soils to release pollutants to surface waters. In Option 1, with water in the riparian corridor flowing over the top of this pavement, further degradation of the pavement likely would occur over the other options and potentially increase the release of some pollutant types.

In summary, it is expected that all of the options would have a net detrimental effect or at best a neutral impact on water quality as compared to the riparian corridor as constructed. All options leave in place the existing pavement and contamination over the archaeological areas and therefore likely would increase the sources of pollutants that could be transported into the Freshwater Wetland System. Options 1 and 2 have a significant net reduction in water quality treatment area of 25 percent of the entire riparian corridor. Option 4 has approximately the same area, while Option 3 has a slight but insignificant (less then 4 percent) increase in treatment area. Any potential benefit of the insignificant gain in treatment area of Option 3 likely would be more than offset by the negative impacts of leaving the decaying pavement over the archaeological areas in place.

APPENDIX D.vi:
PROGRAMMATIC AGREEMENT

PROGRAMMATIC AGREEMENT
AMONG
THE U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND
THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER,
REGARDING IMPLEMENTATION OF THE PLAYA VISTA PROJECT

WHEREAS, the U.S. Army Corps of Engineers, Los Angeles District (Corps) is considering a permit application for the Playa Vista Development Project, near Marina Del Rey, Los Angeles County, California as authorized by Section 404 of the Clean Water Act; and

WHEREAS, the Corps has determined that the Playa Vista Project may have an effect on properties included in, or eligible for, the National Register of Historic Places and has consulted with the Advisory Council on Historic Preservation (Council) and the California State Historic Preservation Officer (SHPO) pursuant to Section 800.13 of the regulations (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f); and

WHEREAS, Maguire Thomas Partners-Playa Vista (MTP-PV), and the Local Native American Gabrielino Community participated in the consultation and have been invited to concur in this Programmatic Agreement;

Now, THEREFORE, the Corps, the Council, and the SHPO agree that the project shall be administered in accordance with the following stipulations in order to take into account the effects of the project on historic properties.

Stipulations

The Corps will ensure that the following measures are carried out:

1. The Playa Vista Project is divided into four quads, designated Areas A, B, C and D, which together make up the undertaking's Area of Potential Effect (APE) [see Figures 1 and 83 of Playa Vista Archaeological and Historical Project Research Design ("Research Design") by J.H. Altschul, R.S. Ciolek-Torrello, J.A. Homburg, and M.T. Swanson (Statistical Research 1991, Tucson, AZ)]. Areas A, B, C and D of the APE have been surveyed and inventoried and the results are available in Chapter 6 of the "Research Design." Official trinomials shall be obtained for all archeological sites within the APE prior to requesting consultation under Stipulation 2

a. The following historic properties are situated within each respective Area:

1. Area A: CA-LAn-1698. It has been determined by the Corps and the California SHPO that this site is not an historic property, but rather consists of dredged material.

2. Area B: CA-LAn-1970H/SR-2, SR-3, SR-8, SR-9, SR-10.

3. Area C: CA-LAn-54, SR-7, SR-11.

4. Area D: CA-LAn-60/SR-14, CA-Lan-62/SR-15, CA-LAn-193, CA-LAn-211/SR-16, SR-1, CA-LAn-1934H/SR-4, SR-5, CA-LAn-1932H/SR-6, SR-12, SR-13, and SR-17 (Howard Hughes Industrial Complex).

b. The Corps and the California SHPO have agreed that CA-LAn-62/SR-15 and CA-LAn-211/SR-16 are eligible for listing on the NRHP. The Corps and the California SHPO have also agreed that CA-LAn-1933H/SR-5 is ineligible for listing on the NRHP. The remaining sites listed above have not yet been, but will be, formally evaluated under 36 CFR 800.4(c). Prehistoric sites will be evaluated in terms of whether they are contributing members of the Ballona Lagoon Archaeological District.

c. CA-LAn-60/SR-14 and SR-1 are on lands that MTP-PV is entitled to acquire at a later date, but which are not currently owned by MTP-PV, and to which MTP-PV's present access rights are limited. MTP-PV will attempt to obtain permission from the current owners of the lands to undertake Section 106 compliance for these properties prior to when MTP-PV obtains ownership. If said permission cannot be obtained, MTP-PV will, subject to continuing legal restrictions and local ordinances and regulations, undertake Section 106 compliance when it acquires ownership.

2. The Corps shall determine the eligibility of unevaluated historic properties in consultation with the California SHPO and in accordance with 36 CFR 800.4(c). The project "Research Design," which has been developed in consultation with the Corps and the California SHPO, will guide the evaluation of said historic properties. The effects on eligible properties shall be then evaluated by the Corps in consultation with the SHPO. Treatment Plans shall be developed based on these evaluations.

3. The Corps shall ensure that Archeological Treatment Plans (ATPs) are developed in consultation with the SHPO for all historic properties within the undertaking's APE determined eligible to the National Register in accordance with Stipulations A and B. The Corps shall submit each ATP to all of the other parties to this agreement for review and comment. Each party shall have 30 days from receipt of the ATP to comment. Unless objections are raised within the allotted time, the Corps shall ensure that the ATP is implemented as designed. If objections are raised, the Corps shall consult with the objecting party(ies) to remove their concerns according to the provisions set forth in Stipulation 8. Following agreement on the terms of each ATP, the Corps shall ensure it is implemented prior to, or in conjunction with project construction as specified in that plan.

   a. The ATP shall be consistent with the Secretary of the Interior's Standards and Guidelines for Archeological Documentation (48 FR 44734-37), the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format (1989) and Guidelines for Archaeological Research Designs (1991), and take into account the Council's publication, Treatment of Archeological Properties-A Handbook. It shall also be consistent with the Department of the Interior's Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act (53 FR 4727-46).

      The ATP will include a specific plan for dealing with properties discovered during the implementation of the proposed undertaking [cf. 36 CFR 800.11(a)].

   b. Initial (Phase I) construction will begin in parts of Area D (see Figure 1 in Attachment 1). The Parties to this agreement accept the terms of the Phase 1 ATP, entitled Data Recovery Plan for CA-LAn-62 and CA-LAn-211, Playa Vista Archaeological Project (Attachment 1) as a means to take into account the effects of construction of that phase of the project on historic properties.

      Additional ATP's will be developed and implemented for Areas A, B, and C, and the remainder of Area D prior to development of those portions of the APE.

4. The Corps shall ensure that a Historic Resource Treatment Plan (HRTP) is developed in consultation with the SHPO for the Hughes Industrial Historic District. The Corps shall submit the HRTP to all of the other parties to this

agreement for review and comment. Each party shall have 30 days from receipt of the HRTP to comment. Unless objections are raised within the allotted time, the Corps shall ensure that the HRTP is implemented as designed. If objections are raised, the Corps shall consult with the objecting party(ies) to remove their concerns according to the provisions set forth in Stipulation 8. Following agreement on the terms of the HRTP, the Corps shall ensure it is implemented prior to, or in conjunction with project construction as specified in that plan.

5. If cultural deposits are discovered during the project's land-disturbing activities, MTP-PV will treat them in accordance with the provisions of the ATP for that phase of the project. If cultural deposits are discovered for which there is no treatment plan, MTP-PV will cause a temporary halt to these activities and immediately notify the Corps, the SHPO and the Council of the discoveries. The Corps shall ensure that a plan is developed for treating the unexpected discovery. The SHPO and the Council will be given 48 working hours (excluding weekends and holidays) to comment on the plan. The plan may be developed, communicated and approved by telephone and FAX. The Corps shall ensure that the plan is then implemented taking into account the ACHP's and SHPO's comments.

6. The Corps shall ensure that all materials and records resulting from implementation of this agreement are curated in accordance with 36 CFR Part 79.

7. All plans prepared under this agreement shall include a schedule for the submission and review by the Corps, and the SHPO of technical reports, progress reports, and the methods by which the consulting and interested parties, including interested Native Americans, will be kept informed of the work and afforded the opportunity to participate.

Administrative Provisions

8. Should any party to this agreement object within 30 days to any actions pursuant to this agreement, the Corps shall consult with the objecting party to resolve the objection. If the Corps determines that the objection cannot be resolved, the Corps shall forward all documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

   a. provide the Corps with recommendations, which the Corps will take into account in reaching a final decision regarding the dispute; or

   b. notify the Corps that it will comment pursuant to 36

CFR 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the Corps in accordance with 36 CFR 800.6(c)(2) with reference to the subject of the dispute.

c. Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute; the Corps's responsibility to carry out all actions under this agreement that are not the subject of the dispute will remain unchanged.

9. The parties to this Agreement shall consult annually, beginning one year from the date this Agreement is executed, to review implementation of the terms of the Agreement to determine whether revisions are needed. If revisions are needed, the parties to this agreement will consult in accordance with 36 CFR Part 800 to make such revisions.

a. To provide the basis for the annual review of the Agreement's terms, the Corps shall submit a report annually, beginning one year from the date of this agreement is executed, on implementation of the agreement. The Corps will provide the report to the SHPO, the Council, and other interested parties for review and comment and consultation as needed. The annual report shall include, at a minimum, discussions of:

1. Problems with and recommended revisions to the agreement; revisions to the Agreement shall be accomplished in accordance with Stipulation 8;

2. Results of on-going inventory, evaluation, and accomplishments;

3. Protection accomplishments; and

4. Dissemination of information.

10. The Corps shall ensure that all historic preservation work carried out pursuant to this PA is carried out by or under the direct supervision of a person or persons, meeting at a minimum the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-44739).

11. The Corps, the Council or the SHPO may request that the PA be amended, whereupon they will consult in accordance with 36 CFR 800.5(e)(5).

12. The Corps, the Council or the SHPO may terminate the agreement when it is not found to be effectuating the purpose of the Act and regulations, by providing thirty (30) days notice to the other parties, provided that the parties will consult during the period prior to termination to seek agreement on amendments, or actions that would avoid termination. In the event of termination, the Corps will comply with 36 CFR Sections 800.4 through 800.6 with regard to individual undertakings covered by this agreement.

13. This Programmatic Agreement expires ten (10) years from the date it is ratified. Immediately prior to its expiration, the parties to this Agreement shall reconsult to determine whether the terms of the agreement have been met, whether revisions are needed, and whether the Agreement should be extended for the Playa Vista Development Project.

14. In the Event the Corps does not carry out the terms of this Agreement, the Corps will comply with 36 CFR Sections 800.4 through 800.6 with regard to individual undertakings covered by this Agreement.

Execution and implementation of this Programmatic Agreement evidences that the Corps has satisfied its Section 106 responsibilities for all individual undertakings of the program.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: Robert D. Bush Date: 10/22/91

U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT

By: Charles S. Thomas Date: 30 Sept 91
Colonel Charles S. Thomas, District Engineer

CALIFORNIA STATE HISTORIC PRESERVATION OFFICER

By: Kathryn Gualtieri Date: 9-6-91
Name:
Title:

Concur:

MAGUIRE THOMAS PARTNERS-PLAYA VISTA, a California Limited Partnership (landowner/applicant)

By:_____ Date:_____
Name:
Title:

INTERESTED GABRIELINO

By: Vera Rocha Date: 9/4/91
Name: Vera Rocha
Title: Chief Yaanna

By: Manuel LaRocha Date: 9/4/91
Name:
Title: SPIRTUAL LEADER

Attachment 1: Phase I Data Recovery Plan.

Concur:

MAGUIRE THOMAS PARTNERS-PLAYA VISTA, a California Limited Partnership (landowner/applicant)

By:_____ Date:_____
Name:
Title:

INTERESTED GABRIELINO

By: Cindi M. Alvitre Date: Sept. 10, 1991
Name: CINDI M. ALVITRE
Title: CHAIRPERSON, Gabrieleno (Tongva) Tribal Council

BY:_____ Date:_____
Name:
Title:

Attachment 1: Phase I Data Recovery Plan.

Concur:

MAGUIRE THOMAS PARTNERS-PLAYA VISTA,
a California Limited Partnership

By: MAGUIRE THOMAS PARTNERS/JMB PLAYA VISTA ASSOCIATES, L.P.
a California Limited Partnership

By: MAGUIRE THOMAS PARTNERS-PLAYA VISTA ASSOCIATES

By: MAGUIRE/THOMAS PARTNERS, INC.
a California Corporation

By: _____ Date: 9/16/91

Its: Vice President

APPENDIX D.vii:
LETTER TO PLAYA VISTA REGARDING THE PROGRAMMATIC AGREEMENT EXTENSION, OCTOBER 30, 2001

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

October 30, 2001

REPLY TO
ATTENTION OF
Office of the Chief
Regulatory Branch

Mr. Marc Huffman
Playa Vista
12555 W. Jefferson Blvd., Suite 300
Los Angeles, California 90066

Dear Mr. Huffman:

This letter is in regards to the Playa Vista Archaeological and Historical Project in Los Angeles County, California. The Playa Vista Development Project requires a Section 404 Permit under the Clean Water Act (Permit No. 90-426-EV). A Programmatic Agreement (PA) was executed on October 22, 1991 (Enclosure). The PA expired on October 2001. Pursuant to Stipulation 13 of the PA, all parties participated in reconsultation. We have concluded the process and we are hereby notifying all parties in writing that the PA has been extended until October 22, 2011.

The California State Historic Preservation Officer, the Advisory Council on Historic Preservation, and several Gabrielino/Tongva Indian groups, including the concurring parties to the PA, have also been notified. If you have any questions, please direct them to Mr. Roderic McLean, Staff Archeologist at (213) 452-3879.

Sincerely,

Mark Durham

Mark F. Sudol, D.Env.
Chief, Regulatory Branch

Enclosure

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Reply to: 730 Simms Street, #401
Golden, Colorado 80401

October 29, 1991

Charles S. Thomas
District Engineer
Los Angeles District
Corps of Engineers
P.O. Box 2711
Los Angeles, CA 90053-2325

REF: Programmatic Agreement regarding the Playa Vista Development Project

Dear Colonel Thomas:

The enclosed Programmatic Agreement regarding the Playa Vista Development Project has been executed by the Council. This action constitutes the comments of the Council required by Section 106 of the National Historic Preservation Act and the Council's regulations. Please send copies of this Agreement to the California State Historic Preservation Officer and to the concurring parties to the agreement.

The Council appreciates your cooperation in reaching a satisfactory resolution of this matter and looks forward to review of the treatment plans called for in the agreement.

Sincerely,

for Claudia Nissley
Director, Western Office
of Project Review

Enclosure

ENCLOSURE( )

PROGRAMMATIC AGREEMENT
AMONG
THE U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND
THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER,
REGARDING IMPLEMENTATION OF THE PLAYA VISTA PROJECT

WHEREAS, the U.S. Army Corps of Engineers, Los Angeles District (Corps) is considering a permit application for the Playa Vista Development Project, near Marina Del Rey, Los Angeles County, California as authorized by Section 404 of the Clean Water Act; and

WHEREAS, the Corps has determined that the Playa Vista Project may have an effect on properties included in, or eligible for, the National Register of Historic Places and has consulted with the Advisory Council on Historic Preservation (Council) and the California State Historic Preservation Officer (SHPO) pursuant to Section 800.13 of the regulations (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f); and

WHEREAS, Maguire Thomas Partners-Playa Vista (MTP-PV), and the Local Native American Gabrielino Community participated in the consultation and have been invited to concur in this Programmatic Agreement;

Now, THEREFORE, the Corps, the Council, and the SHPO agree that the project shall be administered in accordance with the following stipulations in order to take into account the effects of the project on historic properties.

Stipulations

The Corps will ensure that the following measures are carried out:

1. The Playa Vista Project is divided into four quads, designated Areas A, B, C and D, which together make up the undertaking's Area of Potential Effect (APE) [see Figures 1 and 83 of Playa Vista Archaeological and Historical Project Research Design ("Research Design") by J.H. Altschul, R.S. Ciolek-Torrello, J.A. Homburg, and M.T. Swanson (Statistical Research 1991, Tucson, AZ)]. Areas A, B, C and D of the APE have been surveyed and inventoried and the results are available in Chapter 6 of the "Research Design." Official trinomials shall be obtained for all archeological sites within the APE prior to requesting consultation under Stipulation 2.

a. The following historic properties are situated within each respective Area:

1. Area A: CA-LAn-1698. It has been determined by the Corps and the California SHPO that this site is not an historic property, but rather consists of dredged material.

2. Area B: CA-LAn-1970H/SR-2, SR-3, SR-8, SR-9, SR-10.

3. Area C: CA-LAn-54, SR-7, SR-11.

4. Area D: CA-LAn-60/SR-14, CA-Lan-62/SR-15, CA-LAn-193, CA-LAn-211/SR-16, SR-1, CA-LAn-1934H/SR-4, SR-5, CA-LAn-1932H/SR-6, SR-12, SR-13, and SR-17 (Howard Hughes Industrial Complex).

b. The Corps and the California SHPO have agreed that CA-LAn-62/SR-15 and CA-LAn-211/SR-16 are eligible for listing on the NRHP. The Corps and the California SHPO have also agreed that CA-LAn-1933H/SR-5 is ineligible for listing on the NRHP. The remaining sites listed above have not yet been, but will be, formally evaluated under 36 CFR 800.4(c). Prehistoric sites will be evaluated in terms of whether they are contributing members of the Ballona Lagoon Archaeological District.

c. CA-LAn-60/SR-14 and SR-1 are on lands that MTP-PV is entitled to acquire at a later date, but which are not currently owned by MTP-PV, and to which MTP-PV's present access rights are limited. MTP-PV will attempt to obtain permission from the current owners of the lands to undertake Section 106 compliance for these properties prior to when MTP-PV obtains ownership. If said permission cannot be obtained, MTP-PV will, subject to continuing legal restrictions and local ordinances and regulations, undertake Section 106 compliance when it acquires ownership.

2. The Corps shall determine the eligibility of unevaluated historic properties in consultation with the California SHPO and in accordance with 36 CFR 800.4(c). The project "Research Design," which has been developed in consultation with the Corps and the California SHPO, will guide the evaluation of said historic properties. The effects on eligible properties shall be then evaluated by the Corps in consultation with the SHPO. Treatment Plans shall be developed based on these evaluations.

3. The Corps shall ensure that Archeological Treatment Plans (ATPs) are developed in consultation with the SHPO for all historic properties within the undertaking's APE determined eligible to the National Register in accordance with Stipulations A and B. The Corps shall submit each ATP to all of the other parties to this agreement for review and comment. Each party shall have 30 days from receipt of the ATP to comment. Unless objections are raised within the allotted time, the Corps shall ensure that the ATP is implemented as designed. If objections are raised, the Corps shall consult with the objecting party(ies) to remove their concerns according to the provisions set forth in Stipulation 8. Following agreement on the terms of each ATP, the Corps shall ensure it is implemented prior to, or in conjunction with project construction as specified in that plan.

   a. The ATP shall be consistent with the Secretary of the Interior's Standards and Guidelines for Archeological Documentation (48 FR 44734-37), the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format (1989) and Guidelines for Archaeological Research Designs (1991), and take into account the Council's publication, Treatment of Archeological Properties-A Handbook. It shall also be consistent with the Department of the Interior's Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act (53 FR 4727-46).

      The ATP will include a specific plan for dealing with properties discovered during the implementation of the proposed undertaking [cf. 36 CFR 800.11(a)].

   b. Initial (Phase I) construction will begin in parts of Area D (see Figure 1 in Attachment 1). The Parties to this agreement accept the terms of the Phase 1 ATP, entitled Data Recovery Plan for CA-LAn-62 and CA-LAn-211, Playa Vista Archaeological Project (Attachment 1) as a means to take into account the effects of construction of that phase of the project on historic properties.

      Additional ATP's will be developed and implemented for Areas A, B, and C, and the remainder of Area D prior to development of those portions of the APE.

4. The Corps shall ensure that a Historic Resource Treatment Plan (HRTP) is developed in consultation with the SHPO for the Hughes Industrial Historic District. The Corps shall submit the HRTP to all of the other parties to this

agreement for review and comment. Each party shall have 30 days from receipt of the HRTP to comment. Unless objections are raised within the allotted time, the Corps shall ensure that the HRTP is implemented as designed. If objections are raised, the Corps shall consult with the objecting party(ies) to remove their concerns according to the provisions set forth in Stipulation 8. Following agreement on the terms of the HRTP, the Corps shall ensure it is implemented prior to, or in conjunction with project construction as specified in that plan.

5. If cultural deposits are discovered during the project's land-disturbing activities, MTP-PV will treat them in accordance with the provisions of the ATP for that phase of the project. If cultural deposits are discovered for which there is no treatment plan, MTP-PV will cause a temporary halt to these activities and immediately notify the Corps, the SHPO and the Council of the discoveries. The Corps shall ensure that a plan is developed for treating the unexpected discovery. The SHPO and the Council will be given 48 working hours (excluding weekends and holidays) to comment on the plan. The plan may be developed, communicated and approved by telephone and FAX. The Corps shall ensure that the plan is then implemented taking into account the ACHP's and SHPO's comments.

6. The Corps shall ensure that all materials and records resulting from implementation of this agreement are curated in accordance with 36 CFR Part 79.

7. All plans prepared under this agreement shall include a schedule for the submission and review by the Corps, and the SHPO of technical reports, progress reports, and the methods by which the consulting and interested parties, including interested Native Americans, will be kept informed of the work and afforded the opportunity to participate.

Administrative Provisions

8. Should any party to this agreement object within 30 days to any actions pursuant to this agreement, the Corps shall consult with the objecting party to resolve the objection. If the Corps determines that the objection cannot be resolved, the Corps shall forward all documentation relevant to the dispute to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

   a. provide the Corps with recommendations, which the Corps will take into account in reaching a final decision regarding the dispute; or

   b. notify the Corps that it will comment pursuant to 36

CFR 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the Corps in accordance with 36 CFR 800.6(c)(2) with reference to the subject of the dispute.

c. Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute; the Corps's responsibility to carry out all actions under this agreement that are not the subject of the dispute will remain unchanged.

9. The parties to this Agreement shall consult annually, beginning one year from the date this Agreement is executed, to review implementation of the terms of the Agreement to determine whether revisions are needed. If revisions are needed, the parties to this agreement will consult in accordance with 36 CFR Part 800 to make such revisions.

a. To provide the basis for the annual review of the Agreement's terms, the Corps shall submit a report annually, beginning one year from the date of this agreement is executed, on implementation of the agreement. The Corps will provide the report to the SHPO, the Council, and other interested parties for review and comment and consultation as needed. The annual report shall include, at a minimum, discussions of:

1. Problems with and recommended revisions to the agreement; revisions to the Agreement shall be accomplished in accordance with Stipulation 8;

2. Results of on-going inventory, evaluation, and accomplishments;

3. Protection accomplishments; and

4. Dissemination of information.

10. The Corps shall ensure that all historic preservation work carried out pursuant to this PA is carried out by or under the direct supervision of a person or persons, meeting at a minimum the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-44739).

11. The Corps, the Council or the SHPO may request that the PA be amended, whereupon they will consult in accordance with 36 CFR 800.5(e)(5).

12. The Corps, the Council or the SHPO may terminate the agreement when it is not found to be effectuating the purpose of the Act and regulations, by providing thirty (30) days notice to the other parties, provided that the parties will consult during the period prior to termination to seek agreement on amendments, or actions that would avoid termination. In the event of termination, the Corps will comply with 36 CFR Sections 800.4 through 800.6 with regard to individual undertakings covered by this agreement.

13. This Programmatic Agreement expires ten (10) years from the date it is ratified. Immediately prior to its expiration, the parties to this Agreement shall reconsult to determine whether the terms of the agreement have been met, whether revisions are needed, and whether the Agreement should be extended for the Playa Vista Development Project.

14. In the Event the Corps does not carry out the terms of this Agreement, the Corps will comply with 36 CFR Sections 800.4 through 800.6 with regard to individual undertakings covered by this Agreement.

Execution and implementation of this Programmatic Agreement evidences that the Corps has satisfied its Section 106 responsibilities for all individual undertakings of the program.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: Robert D. Bush Date: 10/22/91

U.S. ARMY CORPS OF ENGINEERS, LOS ANGELES DISTRICT

By: Charles S. Thomas Date: 30 Sep 91
Colonel Charles S. Thomas, District Engineer

CALIFORNIA STATE HISTORIC PRESERVATION OFFICER

By: Kathryn Gualtieri Date: 9-6-91
Name:
Title:

Concur:

MAGUIRE THOMAS PARTNERS-PLAYA VISTA,
a California Limited Partnership

By: MAGUIRE THOMAS PARTNERS/JMB PLAYA VISTA ASSOCIATES, L.P.
a California Limited Partnership

By: MAGUIRE THOMAS PARTNERS-PLAYA VISTA ASSOCIATES

By: MAGUIRE/THOMAS PARTNERS, INC.
a California Corporation

By: _____ Date: 9/16/91

Its: Vice President

Concur:

MAGUIRE THOMAS PARTNERS-PLAYA VISTA, a California Limited Partnership (landowner/applicant)

By:_____ Date:_____
Name:
Title:

INTERESTED GABRIELINO

By: Vera Rocha Date: 9/4/91
Name: Vera Rocha
Title: Chief YAANNA

BY: Manuel G. Rocha Date: 9/4/91
Name:
Title: SPIRTUAL LEADER

Attachment 1: Phase I Data Recovery Plan.

Concur:

MAGUIRE THOMAS PARTNERS-PLAYA VISTA, a California Limited Partnership (landowner/applicant)

By:_____ Date:_____
Name:
Title:

INTERESTED GABRIELINO

By: Cindi M. Alvitre Date: Sept. 10, 1991
Name: CINDI M. ALVITRE
Title: CHAIRPERSON, Gabrieleno (Tongva) Tribal Council

BY:_____ Date:_____
Name:
Title:

Attachment 1: Phase I Data Recovery Plan.