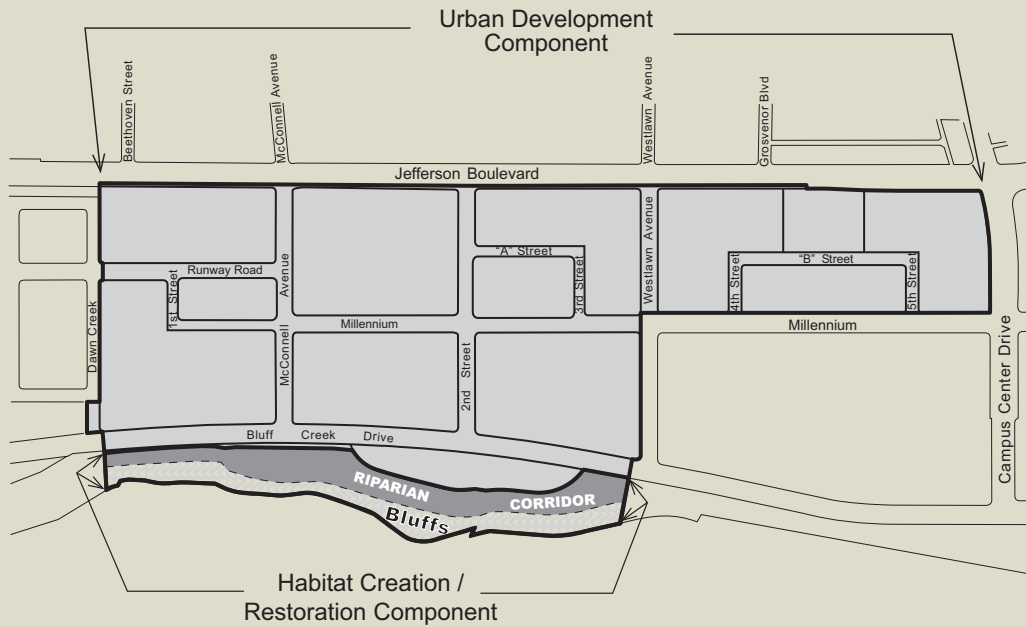


# FINAL ENVIRONMENTAL IMPACT REPORT (FEIR) VILLAGE AT PLAYA VISTA



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2004

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**LETTER NO. 35**

GRASSROOTS COALITION  
3749 Greenwood Ave.  
Los Angeles, CA 90066

FRIENDS of the CHILDREN  
966 Schumacher  
Los Angeles, CA 90048

**Comment 35-1****VOLUME 1 (BOOK 1)****1. Executive Summary; E. Areas of Controversy**

The Executive Summary is inaccurate and trivializes the characterization of the public's concerns. The DEIR as a whole relies upon the Phase 1 EIR which has since been found to have been incorrect, foremost as it has since been discovered, contrary to the EIR, that the area has oilfield gases migrating to the surface and is now classified by the Department of Conservation as being in a liquefaction zone. As a result of the discovery of the oilfield gas migration, the City prepared a Report known as the Chief Legislative Analyst's Report (CLA Report). The CLA Report is used by the Phase 2 EIR as its main source of purported scientific documentation of both Phase 1 and 2. The DEIR's use of the CLA Report is highly flawed and inadequate. The State Environmental Protection Agency—The Department of Toxic Substances Control, responded to the CLA Report stating that it was incomplete and that further studies needed to be done. The DEIR fails to include the DTSC response and later correspondence regarding the Playa Vista site. The CLA Report is highly piecemealed, excluding [*sic*] much of the available City data and information, information which contradicts conclusions rendered in the CLA Report. Attached to this response are CLA comment/response pages written by Grassroots Coalition. The comments made within the pages have opened two licensing board investigations regarding the geologic and engineering portions of the CLA Report. These investigations are ongoing.

The DEIR should, as CEQA compels, include and consider all the available City and Playa Capital held data and information regarding the Playa Vista site and region (as it pertains to the Playa Vista site and as the Playa Vista site impacts the region)

**Response 35-1**

The First Phase Project EIR has not been found "incorrect." There have been six lawsuits challenging the sufficiency of the First Phase Project EIR under CEQA since 1993. None of the challenges has succeeded. On February 10, 2004, the Honorable George Wu of the Los Angeles Superior Court denied a petition for writ of mandate brought by the commentator, among others,

which requested a Subsequent EIR for the First Phase Project based on the discovery of methane gas and the classification of the First Phase Project site as a liquifaction zone. See *Environmentalism Through Inspiration and Non-Violent Action, et al. v. City of Los Angeles, et al.*, Los Angeles Superior Court Case No. BS070757. Please see Topical Response TR-13, First Phase Project Litigation History, on page 482.

A detailed discussion regarding methane is provided in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 700. This issue is also addressed in Topical Response TR-12, Soil Gas, on page 477. As discussed in Subsection 2.2.4.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 710-713, between June 2000 and March 2001, the CLA conducted an independent and public review of issues of potential concern at Playa Vista. As part of the Chief Legislative Analyst (CLA) review process, the City's Department of Building and Safety asked its independent peer reviewer, Dr. Victor T. Jones III of Exploration Technology, Inc. ("ETI") to assist the Department with issues concerning the CLA process. In addition, the CLA retained Kleinfelder, Inc. as the CLA's consultant, and consulted with the City's Bureau of Engineering, the City's Department of Building and Safety, the City Attorney's office, the State's Division of Gas and Geothermal Resources ("DOGGR"), the California Department of Conservation Division of Geology and Mines, and the Regional Water Quality Control Board ("RWQCB"), all of whom independently reviewed technical issues associated with the Playa Vista site. As part of that review process, the Applicant also retained its own consultants, including Dr. Kul Bhusan, Mr. Nabih Youssef, Dr. Isaac Kaplan, Dr. Kerry Sieh, Dr. Thomas Davis, Dr. James Embree, and Mr. John Sepich, regarding the issues addressed during the CLA's review process.

In its comment to the Draft EIR, the DTSC attaches its comment on the CLA Report (see Comment 12-2). As a result, that letter has been incorporated into the Final EIR for the Proposed Project. The responses of the City's Chief Legislative Analyst and the Applicant to the DTSC's comments to the May 2001 CLA Report have been added to the Appendix to the Final EIR.

Relating to liquefaction hazards at the site, as discussed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256, there exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. Nonetheless, the City Department of Building and Safety requires site-specific geotechnical investigations for issuance of building permits for individual structures prior to construction. Further, application of engineered fill soils in building pads would address the potential for liquefaction directly under structures. As a result, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

## **Comment 35-2**

1. Issues addressed by Grassroots Coalition as part of the Notice of Preparation (NOP) and the Public Scoping Meeting have not been considered in the Draft Environmental Impact Report (DEIR). Please provide a response, including the data to back up the response, to the following issues and comments. The issues raised by Grassroots included:

a. the need for independent investigation with state and/or federal oversight of protocol and field studies of the source and geotechnical pathways of the newly discovered toxic and hazardous oilfield gases that are migrating into the Playa Vista site and region and

### **Response 35-2**

The Comments received at the public scoping hearing (see Appendix B of the Draft EIR) were considered in the preparation of the Draft EIR, as appropriate.

The Draft EIR analyses relative to earth resources in Section IV.A, Earth, and Safety/Risk of Upset in Section IV.I, Safety/Risk of Upset, are based on numerous comprehensive studies prepared by several highly qualified firms and individuals. Where appropriate, several of those studies were submitted directly to pertinent regulatory agencies for review. All of the studies used in the Draft EIR analyses were included in the technical appendices or made otherwise available for review by agencies and the public. The availability of this information enables all reviewing agencies, organizations, and the public to review and comment on the adequacy, accuracy, and appropriateness of the data used in the Draft EIR analyses.

As discussed in Subsection 2.2.2.2.4 of Section IV.A, Earth, of the Draft EIR, starting on page 227, and in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, starting on page 700, several extensive geotechnical and soil gas studies were performed at the Proposed Project site and adjacent First Phase Project to evaluate the potential sources and migration of soil gases, and on-site geologic conditions (including faulting, which was purported as being a possible soil gas migration pathway).

As stated in the September 16, 2003, letter from the California Environmental Protection Agency Secretary, Winston Hickox, to Grassroots Coalition (see the Appendix of the Final EIR), the RWQCB and the DTSC do not have regulatory authority or jurisdiction over naturally occurring methane or oil field gas issues. Secretary Hickox further noted that “the City of Los Angeles, Department of Building and Safety and the State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources have authority over the oilfield gas issues.” The Department of Building and Safety has authority over methane gas issues only. Methane assessments at building sites within the Proposed Project site will be performed pursuant to methodologies approved by the Department of Building and Safety. Therefore, no additional regulatory review is required.

### **Comment 35-3**

b. Issues regarding the need for further prudent soil gas studies that must be done in undisturbed soils for competent test results.

**Response 35-3**

As discussed in Section 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-716, the LADBS's independent peer reviewer, ETI, designed and completed a soil gas survey consisting of 812 sample locations placed on a 100 foot staggered grid over the adjacent Playa Vista First Phase Project Site and onto the Proposed Project Site. Subsequently, over 200 additional locations were sampled in the Proposed Project Site pursuant to a sampling protocol developed in consultation with and approved by LADBS and ETI. These studies provide a baseline of soil gas data. In addition to these baseline assessments, as described in Subsections 2.1.3.3, 3.4.4 and 4.0 of Section IV, Safety/Risk of Upset, of the Draft EIR, on pages 669-670, 732-33 and 738-739, respectively, and Appendix J-14, prior to issuance of building permits, prospective builders will complete additional soil gas assessments. See also Topical Response TR-12, Soil Gas, on page 477.

**Comment 35-4**

c. Investigation of ecological and human health risk impacts of the newly discovered oilfield gases.

**Response 35-4**

As described in Section IV.I, Safety/Risk of Upset, of the Draft EIR, and in various reports by Camp Dresser & McKee, Inc. (Appendices J-7, J-8, and J-9 of the Draft EIR), soil gas sampling throughout the Playa Vista area, including the Proposed Project site, has been extensive. Soil gases, including those associated with oilfields, have been well characterized.

Potential health risks associated with oil field gases were addressed in Subsections 2.2.4.1.2.1. and 2.2.4.1.2.2. of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 707 to 713. As described in Subsections 2.1.3.3 and 4 of the Draft EIR, and in Appendix J-14, LADBS has developed guidelines for the mitigation of potential oil field gas impacts to buildings at the Proposed Project site. See also Topical Response TR-12, Soil Gas, on page 477.

As discussed in Subsection 2.2.4.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, "potential health risks associated with BTEX and hydrogen sulfide soil gas emissions at the adjacent Playa Vista First Phase Project site, whether associated with methane or soil and groundwater contamination, were below the benchmarks established by U.S. EPA, DTSC, OEHHA, and other regulatory agencies to indicate significant risk, and no further investigation or remediation was warranted." In general, the levels of BTEX and hydrogen sulfide soil gas are lower at the Proposed Project site.

On October 25, 2003, the U.S. EPA issued an Expanded Site Inspection Report for the Playa Vista site (see the Appendix for the Final EIR). The report contains the results of an evaluation conducted by the USEPA under the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), commonly known as "Superfund." The purpose of the study

was to determine if the site qualifies for placement on the National Priorities List based on historical industrial contamination and ecological issues. The U.S. EPA determined that the Proposed Project site does not qualify for Superfund listing and no further assessment by U.S. EPA is warranted. As indicated in the Draft EIR in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, on page 668, and documents in the reference library for the Draft EIR, a cumulative, post-remediation human health risk assessment will be performed for the Proposed Project site by a qualified environmental engineering firm upon completion of all remediation activities within the Proposed Project and adjacent First Phase project sites, and submitted to the RWQCB (the lead agency under CAO 98-125). This assessment will also follow the applicable U.S. EPA and Cal-EPA guidance for conducting human health risk assessments and will evaluate all appropriate exposure scenarios, including below grade structures.

### **Comment 35-5**

d. Subsidence issues have not been addressed. Where is the data regarding a subsidence study of the area? The DEIR only provides a mathematically flawed transverse survey done for Playa Capital for the Chief Legislative Analyst's Report (CLA Report). This survey does not address the impacts of subsidence that pertain to well bore (including oil well bore), pilings integrity. The survey does not address the potential negative impacts of subsidence from the long term dewatering of the site that must occur for safety of the gas mitigation systems onsite.

### **Response 35-5**

The Draft EIR addresses subsidence. As discussed in Subsections 2.2.2.4 and 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on pages 237 and 253, respectively, subsidence over the past 50 years at the Proposed Project site has been minimal, and Group Delta Consultants' "Evaluation of Subsidence Due to Lowering of Groundwater, Village at Playa Vista, Playa Vista Development, Playa Vista Project," dated April 15, 2003 (Appendix D-6 of the Draft EIR), concluded that development of the Proposed Project (including operation of associated dewatering systems) would not result in subsidence at the site (Appendix D-6 of the Draft EIR on page 5). The Draft EIR identifies on page 237-238, that the area over the Playa del Rey production area, located to the west of the site, experienced only about 0.3 feet of subsidence over the last 45 years (as surveyed by the City of Los Angeles Department of Public Works and confirmed by Group Delta Consultants). Group Delta Consultants also found that areas closer to the site have experienced less than 2 inches of subsidence over the last 26 years (page 238 of the Draft EIR). The maximum depth to which permanent dewatering systems would lower the shallow water table is not expected to result in significant subsidence. The minor local change in water level is not expected to have a significant potential to impact gas migration in the subsurface or the performance of the mitigation systems.

There are no operating oil or gas wells within the Proposed Project site or in vicinity of the Proposed Project site. Further, because the geotechnical analysis of the subsidence potential concludes that no significant subsidence will result on site, no impact to support piles or oil well casings on the site is expected.

**Comment 35-6**

e. Please respond with scientific data to comments from the Phase 1 Playa Vista EIR, that we resubmit for the Phase 2 DEIR. Attached are comments numbers W-42, W-42.1; 42.2; 42.3 and W-43, W-43.1. Please address the comments that regard gas leakage from the the [sic] SOCALGAS reservoir AND as the comment describes “gas lost into the surrounding geologic structure”. Please address not just the gas pumped into the SOCALGAS reservoir but, also the native oilfield gases and the potential mixing of the native gases with the reservoir gases. The 1993-5 EIR for Playa Vista responded that there were no shallow zones or pockets of gas that could migrate to the surface. We now know that conclusion was wrong because the site is now known to be one of the largest oilfield gas seeps in the world according to the City’s peer review team. The DEIR does not consider the significant impacts of the oilfield gas seepage that is now known to exist in the Playa Vista site and region. The DEIR and the CLA Report do not consider the mixing of native oilfield gases with SOCALGAS reservoir gases in the isotopic fingerprinting interpretation of oilfield gases found surfacing on the Playa Vista site. Please address this critical scientific issue.

**Response 35-6**

The City responded to the attached comments from the First Phase EIR during the environmental review process for the First Phase Project. See Topical Response TR-13, First Phase Project Litigation History, on page 482 and Comment Letter 10 from the Division of Oil, Gas and Geothermal Resources.

The issue of “communication” between the Del Rey Storage Facility and the Playa Vista Project site has been investigated extensively. It was concluded that the methane at Playa Vista is not migrating from the Storage Facility. In his April 17, 2000, report (Appendix J-10 of the Draft EIR), the City’s peer reviewer, Dr. Victor Jones III of Exploration Technologies, Inc., stated that “[t]he soil gas and monitor well data from site 509 indicates there is no gas migration at this location from the adjacent Playa del Rey storage field.” See Dr. Victor Jones’ April 17, 2000, report. Furthermore, in 1993 and 1994, Dr. Isaac Kaplan analyzed gas samples from the Del Rey Storage Facility and gas samples from the Ballona Channel and Centinela Creek. In the study, Dr. Kaplan concluded that the gas located in the Ballona Channel and Centinela Creek was not emanating from the storage facility. See January 20, 1994, report by Dr. Isaac Kaplan, entitled “Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina Del Rey, California” (a copy is in the reference library for the Final EIR).

To further evidence that the gas detected at Playa Vista is not migrating from the reservoir, Playa Vista, The Gas Company, the City’s Department of Building and Safety, and Dr. Victor Jones compared analyses on various components of gas from injection wells and observation wells at the Del Rey Storage Facility and the aquifer and soil gas samples from Playa Vista and concluded “with a high degree of confidence, that there is no evidence for migration of the Southern California Gas Company stored gases into the Ballona Aquifer or into the surface soil at Playa Vista site.” See “Report on Comparison of Gas Analyses from Southern California Gas

Company Injection Wells with Soil Gas and Groundwater Gas from 50 ft. Gravel Aquifer” dated January 29, 2001 (a copy is in the reference library for the Final EIR). In January 2001, the Department of Building and Safety concurred that the methane gas observed at Playa Vista does not come from the Del Rey Storage Facility. See January 31, 2001, letter from Department of Building and Safety to the Applicant. Copies of these references are included in the reference library for the Final EIR.

Further, this issue was evaluated from 2000 to 2001 by the CLA, in consultation with the City’s Bureau of Engineering, the City’s Department of Building and Safety, Dr. Jones, Kleinfelder, Inc., the CLA’s peer reviewer, and California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. Kleinfelder concluded: “Methane detected in soil gas samples is not associated with the nearby natural gas reservoir.” See February 7, 2001, report by Kleinfelder, entitled “Methane Sampling Data Assessment Playa Vista Development Los Angeles, California,” p. 3. The CLA Report, Appendix J-6 to the Draft EIR, found: “The Southern California Gas Company Playa Del Rey Gas Storage facility is not the source of methane contamination found at the site. Furthermore, there is no evidence that suggests that the gas storage facility is leaking or improperly maintained. There is no evidence that the gas storage facility presents a danger to workers or future residents.”

As described in Section IV.I, Safety/Risk of Upset, of the Draft EIR, and in various reports by Camp Dresser & McKee, Inc. (Appendices J-7, J-8, and J-9 of the Draft EIR), soil gas sampling throughout the Playa Vista area, including the Proposed Project site, has been extensive. Soil gases, including those associated with oilfields, have been well characterized. These issues are also addressed in Topical Response TR-12, Soil Gas, on page 477.

### **Comment 35-7**

The DEIR and the CLA Report do not consider and address the helium and mercaptans found at Playa Vista in the oilfield gas. Please address this issue with detail and supporting data as it pertains to the source of the oilfield gases. The DEIR and the CLA Report do not address the available information regarding hydrogen sulfide (H<sub>2</sub>S), including the Playa Vista archaeology, and boring log data. Please address with detail and data the H<sub>2</sub>S at the site, including the medical risks with data and detail from a medical expertise.

### **Response 35-7**

In 2001, Zymax Forensics performed a comparison of gas characteristics from three injection wells, six observation wells, and a metering station at the Southern California Gas Company (“SCGC”) Storage Facility to the gas characteristics of 42 groundwater gas samples collected within the western portions of the adjacent Playa Vista First Phase Project (see the reference library of the Final EIR for a copy of the Zymax, January 29, 2001, report). The groundwater samples were collected by CDM and ETI, the City’s Peer Reviewer, in October/November 1999. Zymax compared the results of helium concentrations, and the isotopic ratios of helium, as well as numerous other chemical analyses, to discern whether gas collected from the Ballona aquifer was derived from the SCGC operations. As it pertains to helium, the gas stored in the SCGC

Storage Facility was shown to contain helium concentrations in the range of 100 to 500 parts per million by volume (ppmv), whereas the gas samples from the “50-foot Gravel” aquifer contained no helium above the analytical reporting limits, or helium at concentrations that were several orders of magnitude lower than the SCGC Storage Facility samples. Additionally, the SCGC stored gases were shown to have  $^3\text{He}/^4\text{He}$  isotope ratios of approximately 0.1, whereas this ratio in dissolved gas from the “50-foot Gravel” aquifer was approximately 1.0. Based on the available data, including the helium concentrations and  $^3\text{He}/^4\text{He}$  isotope ratios, Zymax concluded that no evidence exists for the migration of SCGC gas stored in the SCGC Storage Facility to surface soil or to the “50-foot Gravel” aquifer in the adjacent Playa Vista First Phase Project site.

As discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 705, and in the Topical Response TR-12, Soil Gas, on page 477, ETI concluded that there are two main areas of methane gas seepage within the survey area, both of which are thermogenic in nature (see Appendix J-10 of the Draft EIR). ETI’s evaluation of the available methane data suggests that the source of the thermogenic methane is most likely the sands within the Upper Pliocene Pico Formation at depths of approximately 500 to 3,400 feet below surface. In January 2001, ETI concluded the methane gas at the adjacent Playa Vista First Phase Project was not coming from the SCGC Storage Facility.

Information regarding the presence and sources of hydrogen sulfide are addressed in Topical Response TR-12, Soil Gas, on page 477. As discussed in Subsection 2.2.4.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, “potential health risks associated with BTEX and hydrogen sulfide soil gas emissions at the adjacent Playa Vista First Phase Project site, whether associated with methane or soil and groundwater contamination, were below the benchmarks established by EPA, DTSC, OEHHA, and other regulatory agencies to indicate significant risk, and no further investigation or remediation was warranted.” As described in detail in Subsection 2.2.4.1.2.1 and Subsection 2.2.4.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 703 and 714, respectively, in general, the levels of BTEX and hydrogen sulfide soil gas are lower at the Proposed Project site, as discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 714-715.

### **Comment 35-8**

PG. 9 Discusses 1. NO PROJECT. The DEIR is inaccurate and misleading because it discusses no change to the existing physical condition and use of the project site.

The DEIR fails to reveal that the Phase 2 site, since the approvals of Phase 1, been consistently and massively graded, surcharged and used as a stockpile area and catchbasin area for Phase 1 construction. Therefore, the DEIR is inaccurate as the site has already been altered and currently continues to be altered which continues to degenerate the site area, disallowing native species to restore and regenerate the area. We believe that the continued and past use of construction activities on Phase 2 is a violation of CEQA and certainly of any good faith action by Playa Capital.



Please provide a NO PROJECT consideration that is viable. An alternative to the Project that should be considered is keeping the Phase 2 area as an open space/habitat area that could also be utilized by the City of Los Angeles and its citizens as a dual purpose area of habitat/ wetland area that potentially could help cleanse the runoff of Ballona Creek. There is a need for careful review of this potential that would also benefit the City financially and create a greater good potential for the LA citizens that must meet stricter water run-off quality standards in the near future.

### **Response 35-8**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

CEQA Guidelines Section 15126.6(e)(3) sets forth two options for discussing a No Project Alternative. The two options are to define a No Project Alternative in terms of no changes to existing on-site conditions (“no build”), or development of the site without approval of the Proposed Project (i.e., development under existing land use regulations). As such, the site use recommended by the commentor would constitute an alternative to No Project, one in which specific activities are implemented to alter the development that might otherwise occur and enhance the site. A No Project Alternative as defined by CEQA Guidelines Section 15126.6(e)(3) is addressed in Subsection 4.1 of Section VII, Alternatives, on pages 1267 through 1277.

The selection of Alternatives was based on guidelines presented in Section 15126.6 of the State CEQA Guidelines. As indicated in Section 15126.6(a), “an EIR shall describe a range of reasonable alternatives to the project...an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation.” The Draft EIR analyzes a reasonable range of alternatives in Section VII, Alternatives.

The Draft EIR discusses the selection of alternatives and identifies alternatives considered but rejected, including a Regional Park, Habitat Restoration option alternative, in Subsection 3.2 of Section VII, Alternatives on page 1263. As indicated, such an alternative would fail to meet nearly all of the Proposed Project’s basic objectives, there is no indication that funding for such an alternative would be available, and implementation of this alternative is considered speculative. Therefore, this alternative was subsequently rejected from further analysis.

**Comment 35-9**

The DEIR PG. 9 is inaccurate when it states that the No Project Alternative would eliminate net beneficial effects that would occur with the proposed Project including bluff restoration and biotic resources, jobs/ housing...

TO THE CONTRARY, a no build would allow the beneficial effect of stopping the current construction/denigration [*sic*] of the site and thus allow the natural habitat to restore.

TO THE CONTRARY, the biotic resources would benefit and be restored by the withdrawal of the current abuse of construction activities and should require the restoration of the site by removal of the stockpiling/surcharging and excavation.

TO THE CONTRARY, a no build would allow the site to stabilize, thus ultimately allowing for competent gas studies to be performed in soils that have stabilized and thus be considered sufficiently undisturbed by DTSC standards and petroleum engineering and petroleum geologist and oilfield gas migration expert standards.

**Response 35-9**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

Please refer to Response No. 35-8, above, regarding the definition of the No Project alternative. It is clear that a No Project Alternative, as defined by CEQA, would not provide the bluff restoration, nor jobs/housing benefits associated with the Proposed Project. With regard to biotic resources, the analysis of the No Project Alternative states on page 1268 of the Draft EIR: “successional trends indicate that if left undisturbed, the site would not recover its historical biological state because of the severely altered hydrology that makes the site’s vegetation dependent on variable rainfall instead of steady stream flow. This alternative would allow the continued growth of non-native vegetation such as pampas grass and iceplant. This alternative would not benefit from the Proposed Project’s Riparian Corridor component that would result in an enhanced habitat.”

As discussed in Section 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-716, the LADBS’s independent peer reviewer, Exploration Technologies, Inc. (“ETI”), designed and completed a soil gas survey consisting of 812 sample locations placed on a 100-foot staggered grid over the adjacent Playa Vista First Phase Project Site and onto the Proposed Project Site. Subsequently, over 200 additional locations were sampled in the Proposed Project Site pursuant to a sampling protocol developed in consultation with and approved by LADBS and ETI. These studies provide a baseline of soil gas data. In addition to

these baseline assessments, as described in Subsections 2.1.3.3, 3.4.4 and 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 669-670, 732-33 and 738-739, respectively, and Appendix J-14, prior to issuance of building permits, prospective builders will complete additional soil gas assessments. See also Topical Response TR-12, Soil Gas, on page 477.

### **Comment 35-10**

Gas studies and ecological and human health risk studies need to be performed onsite (Still [*sic*] unfulfilled in Phase 1) in undisturbed, native soils which need to be done according to the Department of Toxic Substances Control (DTSC). The DEIR fails to include the DTSC responses to the CLA Report.

### **Response 35-10**

Regarding gas studies and ecological and human health risk studies, see Response 35-4. In its comment to the Draft EIR, the DTSC attaches its comment on the CLA Report (see Comment 12-2). As a result, that letter has been incorporated into the Final EIR for the Proposed Project. The responses of the City's Chief Legislative Analyst, the RWQCB and the Applicant to the DTSC's comments to the May 2001 CLA Report have been added as an Appendix to the Final EIR for the Proposed Project.

### **Comment 35-11**

Thus far Playa Capital cannot demonstrate and has no showing that it has "restored" any Habitat. TO THE CONTRARY, Phase I promises have still not been met. From i.e., Mitigation & Monitoring Requirements of culverts for safe wildlife crossings, to fulfillment of remediating the Howard Hughes toxic plume, have no showing of occurring. CONVERSELY, there is evidence to show that destruction of habitat continues and the toxic plume has nearly doubled in size and has migrated offsite. Therefore, please provide data backed evaluations and considerations in the EIR rather than further promises and rhetoric.

### **Response 35-11**

As indicated in Subsection 3.3.3 on page 544, monitoring data contained in the Ballona Freshwater Marsh Annual Report, December 2003, have demonstrated rapid colonization of the habitat by wildlife, with the number of breeding bird species significantly greater than expected for a newly constructed habitat. This information indicates that habitat is either already established (Freshwater Marsh) or scheduled for establishment (First Phase of the Riparian Corridor) prior to impacts of the Proposed Project. As also stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor component of the Freshwater Wetlands System is expected to have a beneficial effect of establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists. Recent monitoring data as reported in the Ballona Freshwater Wetlands Annual Report, December 2003 is included in the reference library of the Final EIR.

With regard to groundwater contamination, the commentor notes that the contaminant plume “...has nearly doubled in size and has migrated off-site.” Although it is not clear whether the commentor is referring to groundwater contamination within the Proposed Project site or beneath adjacent areas, there is no evidence to support a contention of doubling in size anywhere at Playa Vista.

A description of the ongoing remediation activities in the adjacent Playa Vista First Phase Project is discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR.

As described in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 666 and 667, all remediation-related work at Playa Vista is being completed in compliance with Cleanup and Abatement Order (CAO) 98-125, issued by the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) in December 1998. Some investigations and remediation of the Proposed Project site were completed prior to issuance of the CAO. Pursuant to the CAO, a work plan for a broad investigation of soil and groundwater within the Proposed Project site was submitted on November 20, 2001, and was formally approved by the RWQCB on February 20, 2002 (Appendix J-3 of the Draft EIR). In order to expedite the work, field activities for the investigation were initiated on January 21, 2002, and completed on March 8, 2002. The report (Appendix J-3 of the Draft EIR) presenting the results of these investigations was submitted to the RWQCB on May 15, 2002. Section 6 of the report included specific recommendations for additional characterization activities. In a meeting on January 24, 2003, the RWQCB approved these recommendations. The second phase of field activities was conducted from February 18 through May 1, 2003, culminating with the submittal of an addendum report on August 6, 2003 (Appendix J-15 of the Draft EIR). The August 6, 2003, report is currently under review by the RWQCB. The data presented in Appendices J-3 and J-15 of the Draft EIR are discussed in detail in Subsection 2.2.3.2.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 687 through 694.

Once the RWQCB completes its review of the August 6, 2003, report, a Remediation Plan will be submitted by the Applicant, which will specify the remedial approaches and technology(ies) to be implemented to reduce contaminant levels to acceptable levels as indicated in the Draft EIR. See also Topical Response TR-12, Soil Gas, on page 472. After approval of the Remediation Plan, soil and groundwater remediation will be ongoing for a number of years, under the CAO, as deemed appropriate and necessary by the RWQCB under authority of the Porter-Cologne Water Quality Act of 1970.

The Project Applicant is responsible for compliance with the conditions of the CAO. In the event the development of the Proposed Project were completed before a comprehensive closure is granted by the RWQCB, an economically viable entity would be identified to carry out any remaining environmental responsibilities until site closure is secured.

## **Comment 35-12**

### **METHANE/GAS MITIGATION**

1. There is insufficient information in the DEIR to adequately determine the true impacts of this project on the surrounding environment and future residents. There is insufficient information in the DEIR to adequately determine the true impacts of the 1st Phase of the Playa Vista Project on the surrounding environment and its current and potential residents.

### **Response 35-12**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The information regarding impacts of the Proposed Project is located in the Draft EIR. The First Phase Playa Vista Project was addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995.

### **Comment 35-13**

2. The 2nd Phase DEIR methane gas and mitigation comments are predicated by the true efficacy and impacts of the 1st Phase oilfield gas and mitigation measures (or lack of). Therefore, for comments to be made regarding Phase 2, there must be clear, detailed information as to the implementation and efficacy of the gas mitigation measures of the 1st Phase. The 1st Phase gas mitigation measures, approved by the City Council in order for development to proceed, included multiple experimental and immature technology that had to perform safely or the site was considered too dangerous to develop. At the time of approval, Andrew Adelman, the General Manager of the Los Angeles Building and Safety Department testified before the full City Council, that the mitigation measures were working to safely mitigate the site. The oilfield gas mitigation measures that were collectively approved by the City Council, are known as the Playa Vista Methane Prevention, Detection and Monitoring Program (PVMPDP). The City Council approved the PVMPDP based upon its attribution to a Civil Engineer that had methane gas mitigation specialty knowledge. The Civil Engineer is John Sepich. However, there is no data and detail provided in the DEIR to account for how and if the oilfield gas mitigation systems and their related systems are functioning and/ or are functioning in a manner that protects the environment and the public.

TO THE CONTRARY, there are City documents that attest to the failure and/or lack of implementation of numerous elements of the PVMPDP.

TO THE CONTRARY, there are City documents and State Agency documents that reveal the failure of the oilfield gas mitigation and related systems as well as reveal the City's and Playa Capital's failure to disclose the failures and lack of implementation.

TO THE CONTRARY, there are City documents that reveal the PVMPDP had no Civil Engineer to whom the gas mitigation measures could be attributed to and thus the PVMPDP had no accountability of a Civil Engineer to whom the City Council relied upon in its decision to approve the gas mitigation measures and allow continued development utilizing bond money.

The EIR must address all of the PVMPDP mitigation measures and provide the data and detail to account for the efficacy of the oilfield gas mitigation measures.

### **Response 35-13**

It is unclear to which City documents and State Agency documents the commentor refers. Neither the City nor the Applicant is aware of any failure of the methane mitigation measures used in the adjacent First Phase Project. As discussed in Appendix J-14 of the Draft EIR, individual building methane mitigation systems at the Proposed Project will be tested, maintained and serviced to the satisfaction of the Fire Department. Please see Topical Response TR-12, Soil Gas, on page 477.

### **Comment 35-14**

3. The EIR must address the related dewatering mitigation for the oilfield gas mitigation both as it relates to its efficacy for the gas mitigation systems AND discuss and consider with detail and data how the dewatering may cumulatively affect and/or potentially impact the environment. Please address the potential negative impacts of subsidence as this would relate to potential expansion of the toxic plumes and oilfield gas migration and well bore and piling integrity.

### **Response 35-14**

As described in Subsection 3.4.1.2 of Section IV.A, Earth, dewatering operations may be required for temporary construction or for permanent water control to maintain groundwater below subterranean parking structures and associated methane mitigation systems. Construction dewatering is common in areas where the ground water level is close to the surface. This is particularly true in Venice and parts of Playa del Rey. All construction dewatering and permanent building dewatering will occur within the upper portions of the Bellflower Aquitard. No deep dewatering will occur (Appendix F-1 of the Draft EIR). The precise quantities of dewatering during construction and long term operation of dewatering systems is dependent on local conditions around each building. Therefore, qualitative analyses were conducted in the Draft EIR (Appendix F-1 of the Draft EIR on page 2-34). Depending on specific local conditions there may be little or no water extracted and in other areas the amount of water extracted is not expected to exceed 10 gallons per minute. Following construction, depending on local groundwater levels, a permanent dewatering system may be implemented to maintain groundwater levels below the methane system.

The typical low permeability of the upper Bellflower Aquitard sediments will limit the distance to which changes in water level will propagate (Appendix F-1 of the Draft EIR on page 2-37). No significant changes to any contamination plumes are expected to occur as a result of dewatering. As stated in Subsections 3.4.1.2 and 3.4.2 of Section IV.A, Earth, and IV.I, Safety/Risk of Upset, of the Draft EIR on pages 252 and 726, respectively, significant adverse impacts are not anticipated relative to the rate or change in the direction or movement

(migration) of existing contaminants in groundwater from dewatering associated with operation of the construction or permanent dewatering systems. This is because the maximum flow of the dewatering pipes is very low and their radius of influence on the groundwater unit is expected to be limited. Therefore, the dewatering pipes are not anticipated to draw water across any substantial distance, and impacts would be less than significant.

There are no operating oil or gas wells within the Proposed Project site or in vicinity of the Proposed Project site. Further, because the geotechnical analysis of the subsidence potential concludes that no significant subsidence will result on site, no impact to support piles or oil well casings on the site is expected.

The Draft EIR addresses subsidence. As discussed in Subsections 2.2.2.4 and 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on pages 237 and 253, respectively, subsidence over the past 50 years at the Proposed Project site has been minimal, and Group Delta Consultants “Evaluation of Subsidence Due to Lowering of Groundwater, Village at Playa Vista, Playa Vista Development, Playa Vista Project,” dated April 15, 2003 (Appendix D-6 of the Draft EIR) (reviewed and accepted by the City of Los Angeles) concluded that development of the Proposed Project (including operation of associated dewatering systems) would not result in subsidence at the site (Appendix D-6 of the Draft EIR on page 5). The Draft EIR identifies on page 237-238, that the area over the Playa del Rey production area, located to the west of the site, experienced only about 0.3 feet of subsidence over the last 45 years. Areas closer to the site have experienced less than 2 inches of subsidence over the last 26 years due to regional factors (page 238 of the Draft EIR). The maximum depth to which permanent dewatering systems would lower the shallow water table is expected to not result in significant subsidence. The minor local change in water level is not expected to have a significant potential to impact gas migration in the subsurface or the performance of the mitigation systems.

Please see also Response 35-5.

#### **Comment 35-15**

4. The DEIR fails to address the potential of altered/exacerbated oilfield gas migration as a consequence of the pilings used to offset liquefaction as well as altered/ exacerbated oilfield gas migration as a consequence of capping the area with construction of both Phase 1 and 2. The DEIR fails to consider the need for new oilfield gas studies which would help determine any new or altered gas pathways for both the Phase 1 and 2 areas.

#### **Response 35-15**

As discussed in Section 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-716, the LADBS’s independent peer reviewer, Exploration Technologies, Inc. (“ETI”), designed and completed a soil gas survey consisting of 812 sample locations placed on a 100-foot staggered grid over the adjacent Playa Vista First Phase Project site and onto the Proposed Project site. Subsequently, over 200 additional locations were sampled in the Proposed Project site pursuant to a sampling protocol developed in consultation with and approved by

LADBS and ETI. These studies provide a baseline of soil gas data. In addition to these baseline assessments, as described in Subsections 2.1.3.3, 3.4.4 and 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 669-670, 732-33 and 738-739, respectively, and Appendix J-14, prior to issuance of building permits, prospective builders will complete additional soil gas assessments for individual developments. See also Topical Response TR-12, Soil Gas, on page 477. Please also see Response 35-7.

In 2001, Zymax Forensics studied the impact of pilings on soil gas in the First Phase residential area. The study found the driving of piles at the Fountain Park Apartments did not result in the long-term increase in gas migration to that location. See the January 19, 2001, report, entitled *Concentration of Hydrogen Sulfide, BTEX Aromatic Hydrocarbons and C<sub>1</sub>-C<sub>4</sub> Gaseous Hydrocarbons in Soil at Tract-03 Beneath Fountain Park Apartments Following Installation of Concrete Pilings*, by Isaac R. Kaplan, Zymax Forensics, Inc., located in the reference library for the Draft EIR.

### **Comment 35-16**

5. The DEIR fails to include the Department of Toxic Substances Control (DTSC) comments of the Chief Legislative Analyst's Report (CLA Report) and its later comments regarding the Playa Vista site. The DTSC comments addressed the CLA Report as being incomplete, and the need for BTEX and methane and hydrogen sulfide studies to be done on the Playa Vista site in native, undisturbed soils for competent analysis to be performed. DTSC requested further human health and ecological studies to be performed. The DTSC requests have been unfulfilled thus far. The EIR must address these issues.

### **Response 35-16**

In its comment to the Draft EIR, the DTSC attaches its late comment on the CLA Report (see Comment 12-2). As a result, that letter has been incorporated into the Final EIR for the Proposed Project. The commentor ignores DTSC's June 12, 2001, letter acknowledging the CLA's response to DTSC's comments (DTSC's June 12, 2001, letter is included in the Appendix of the Final EIR).

The Chief Legislative Analyst responded to all of the DTSC's comments on the CLA report. The responses of the City's Chief Legislative Analyst and the RWQCB to the DTSC's comments to the May 2001 CLA Report and DTSC's June 12, 2001, letter acknowledging the CLA's response are in the Appendix of the Final EIR. The responses of the Applicant to the DTSC's comments to the May 2001 CLA Report are contained in *Addendum to Phase 1 Residential Area Health-Based Remediation Goals, Playa Vista Development Project, Los Angeles, California Responses to Comments*, dated September 19, 2002, and *Attachment to Addendum to Phase 1 Commercial Area Health-Based Remediation Goals, Playa Vista Development Project, Los Angeles, California Response to Comments*, dated November 27, 2002, which are in the reference library for the Draft EIR and also have been added as an Appendix as part of the Final EIR for the Proposed Project.



As stated in the September 16, 2003, letter from the California Environmental Protection Agency Secretary, Winston Hickox, to Grassroots Coalition (see the Appendix of the Final EIR), the RWQCB and the DTSC do not have regulatory authority or jurisdiction over naturally occurring methane or oil field gas issues. Secretary Hickox further noted that “the City of Los Angeles, Department of Building and Safety and the State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources have authority over the oilfield gas issues.”

As indicated in the Draft EIR in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, on page 668, and documents in the reference library for the Draft EIR, a cumulative, post-remediation human health risk assessment will be performed by a qualified environmental engineering firm for the Proposed Project site, upon completion of all remediation activities within the Proposed Project and adjacent First Phase project sites, and submitted to the RWQCB (the lead agency under CAO 98-125). This assessment will also follow the applicable U.S. EPA and Cal-EPA guidance for conducting human health risk assessments and will evaluate all appropriate exposure scenarios, including below grade structures. Please see Topical Response TR-12, Soil Gas, on page 477 for additional discussion regarding sampling in native soils and health and ecological risks associated with oilfield gases.

### **Comment 35-17**

5.a. The DEIR has insufficient/inadequate information regarding BTEX and Hydrogen Sulfide (H<sub>2</sub>S) information, BTEX and H<sub>2</sub>S as part of the migrating oilfield gas migration onsite (the only BTEX addressed in the DEIR and the 1st Phase EIR is related to the Howard Hughes toxic plumes which include liquid gasoline contamination within the near surface aquifers).

The EIR must address in detail and with data the BTEX and H<sub>2</sub>S issues of both onsite, including open space areas and, potential offsite gas migration due to the capping effects of the construction and/or dewatering potentially altering gas migration pathways.

### **Response 35-17**

Subsections 2.2.4 and 3.4.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-715 and 727-728, respectively, contain an extensive discussion regarding soil gases, including hydrogen sulfide and BTEX. As discussed in Section 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, pages 700-716, LADBS’s peer reviewer, ETI, designed and completed a soil gas investigation consisting of 812 sample locations on a 100-foot staggered grid over Playa Vista site in which the soil gas composition was characterized, including 12 sample locations within the Proposed Project site. Subsequently 214 additional locations were sampled in the Proposed Project site. These soil gas studies included sampling and analyses for BTEX and hydrogen sulfide.

The construction and permanent dewatering will be limited to the upper portion of the Bellflower Aquitard, with no significant impact to underlying aquifers. This minor local change in water level is not expected to have a significant potential to impact gas migration in the subsurface or the performance of the mitigation systems.

Please see Topical Response TR-12, Soil Gas, on page 477 and Response 35-14, above.

### **Comment 35-18**

6. The DEIR includes as a reference for potential future methane gas mitigation, a DRAFT METHANE ORDINANCE (DRAFT) of the City of Los Angeles. The inclusion of the DRAFT is insufficient/inadequate information for use at the Playa Vista site EIR. The City has already stated in hearings that the LA City Methane Code is insufficient to deal with the methane gas at Playa Vista. The new LA City Methane Code is in a DRAFT form which the public has requested to be put on hold for adequate and prudent review by petroleum engineering experts and oilfield gas migration experts. No independent expert review has taken place regarding the DRAFT and there is no detail or data available to show that the DRAFT measures can work safely and/or effectively. We believe that under CEQA the proposed and future DRAFT methodology for mitigating methane alone is an unqualified document for use in an EIR. Please provide detail and data, including field testing in a similar geotechnical situation to the Playa Vista site, of methodology for oilfield gas mitigation.

### **Response 35-18**

On February 4, 2004, the City Council enacted an Ordinance No. 175790, revising Division 71, the Methane Seepage District Regulations, of the Los Angeles Municipal Code (effective 3/29/04). As discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR, that ordinance shall supersede the Village at Playa Vista Building Methane Mitigation Guidelines set forth in Appendix J-14, provided that the requirements in that new ordinance continue to reduce the potentially significant impact to a less-than-significant level. Under the revised Municipal Code, as discussed in Appendix J-14 of the Draft EIR, individual building methane mitigation systems at the Proposed Project will be tested, maintained and serviced to the satisfaction of the Fire Department.

### **Comment 35-19**

7. The DEIR provides no worst case scenario for safely and financially handling a potential disaster of explosion, fire and illness/death as a result of both the presence of the oilfield gases and problems with the gas mitigation systems. Please provide detail and data for response to dealing with a worst case scenario.

### **Response 35-19**

The evidence does not support the Commentor's statement that there are "problems with the gas mitigation systems" to be implemented at the Proposed Project. As indicated in Appendix J-14 to the Draft EIR and the City's recently enacted Ordinance 175790, which establishes citywide methane mitigation requirements: "In the event the concentration of methane gas in any building... reaches or exceeds 25 percent of the minimum concentration of gas that will form an

ignitable mixture with air at ambient temperature and pressure, the owner shall hire an engineer to investigate, recommend and implement mitigating measures. These measures shall be subject to approval of this Department and the Fire Department.”

Please also see Comment Letter No. 10 from the Division of Oil, Gas and Geothermal Resources.

The Commentor’s issues regarding financial liability are not environmental comments and are noted and will be incorporated into the Final EIR for the review and consideration of decision-makers.

### **Comment 35-20**

8. The DEIR provides no liability information should there be a disaster at the Playa Vista site due to explosion, fire and illness/death as well as potential lawsuits arising from the gas migration/storage at the site against the City of Los Angeles for allowing the development to occur. (City documents reveal that the Playa Vista site, subtending mineral rights area can be used by SOCALGAS to store gas. SOCALGAS owns the mineral rights throughout the Playa Vista site area and thus has ownership and thus liability under *Sprecher v. Adamson Co.* (Supreme Court 1981) 30 Cal 3rd 358. Please address the legal ramifications of the migrating oilfield gases that are surfacing at Playa Vista as they pertain to SOCALGAS mineral rights and ownership/responsibility and liabilities. It has already been established by the City’s peer reviewer, in City documents (that are also excluded from the DEIR), that SOCALGAS outside well casings have been acting as conduits for oilfield gases to migrate to the surface in the Playa Vista site and area. Please provide data and detail to address these taxpayer liability issues.

### **Response 35-20**

Please see Response 35-19. Expert review indicated the methane at the Proposed Project posed no health risk with the implementation of the Playa Vista Methane Prevention, Detection, and Mitigation Program. See City Investigation of Potential Issues of Concern for Community Facilities District No. 4 Playa Vista Development Project, prepared by the City of Los Angeles Office of the Chief Legislative Analyst (May 2001) (the “CLA Report”), attached as Appendix J-6 to the Draft EIR.

The residential and commercial portions of the entitled areas of Playa Vista are not located over the Southern California Gas Company’s Del Rey Gas Storage facility. Furthermore, the First Phase EIR for the adjacent Playa Vista First Phase Project and the Draft EIR for the Proposed Project considered the risk of gas migration from the Del Rey Storage Facility.

The Gas Company has operated the Del Rey Storage Facility for almost fifty years. The Del Rey Storage Facility is approximately one mile beneath the surface and is overlain by a thick, impermeable, concave layer of shale that is between 50 and 250 feet thick. This cap prevents stored gas from rising into any adjacent porous layer. The facility is constantly monitored for pressure. At the time of discovery, the reservoir held oil and gas at 2,700 pounds per square inch

(psi) of pressure, and had done so for millions of years. The Gas Company limits maximum reservoir pressure in the storage facility to less than 1,700 psi. The Gas Company records all gas injected and withdrawn in the storage facility. The facility is regulated by a number of state and local regulatory agencies.

The issue of “communication” or gas migration between the Del Rey Storage Facility and the Playa Vista Project site has been investigated extensively. It was concluded that the methane at Playa Vista is not migrating from the Storage Facility. In his April 17, 2000, report, the City’s peer reviewer, Dr. Victor Jones III of Exploration Technologies, Inc., stated that “[t]he soil gas and monitor well data from site 509 indicates there is no gas migration at this location from the adjacent Playa del Rey storage field.” See Dr. Victor Jones’ April 17, 2000, report. Furthermore, in 1993 and 1994, Dr. Isaac Kaplan analyzed gas samples from the Del Rey Storage Facility and gas samples from the Ballona Channel and Centinela Creek. In the study, Dr. Kaplan concluded that the gas located in the Ballona Channel and Centinela Creek was not emanating from the storage facility. See January 20, 1994, report by Dr. Isaac Kaplan, entitled “Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina Del Rey, California” (a copy is in the reference library for the Final EIR).

To further evidence that the gas detected at Playa Vista is not migrating from the reservoir, Playa Vista, The Gas Company, the City’s Department of Building and Safety, and Dr. Victor Jones compared analyses on various components of gas from injection wells and observation wells at the Del Rey Storage Facility and the aquifer and soil gas samples from Playa Vista and concluded “with a high degree of confidence, that there is no evidence for migration of the Southern California Gas Company stored gases into the Ballona Aquifer or into the surface soil at Playa Vista site.” See “Report on Comparison of Gas Analyses from Southern California Gas Company Injection Wells with Soil Gas and Groundwater Gas from 50 ft. Gravel Aquifer” dated January 29, 2001 (a copy is in the reference library for the Final EIR). In January 2001, the Department of Building and Safety concurred that the methane gas observed at Playa Vista does not come from the Del Rey Storage Facility. See January 31, 2001, letter from the Department of Building and Safety to the Applicant (a copy is in the reference library for the Final EIR).

Further, this issue was evaluated from 2000 to 2001 by the CLA, in consultation with the City’s Bureau of Engineering, the City’s Department of Building and Safety, Dr. Jones, Kleinfelder, Inc., the CLA’s peer reviewer, and California Department of Conservation, division of Oil, Gas, and Geothermal Resources. Kleinfelder concluded: “Methane detected in soil gas samples is not associated with the nearby natural gas reservoir.” See February 7, 2001, report by Kleinfelder, entitled “Methane Sampling Data Assessment Playa Vista Development Los Angeles, California,” p. 3. The CLA Report, Appendix J-6 to the Draft EIR, found: “The Southern California Gas Company Playa Del Rey Gas Storage facility is not the source of methane contamination found at the site. Furthermore, there is no evidence that suggests that the gas storage facility is leaking or improperly maintained. There is no evidence that the gas storage facility presents a danger to workers or future residents.”

**Comment 35-21**

9. The development of the Playa Vista site has been a costly and risky endeavor to both Playa Capital, and the taxpayers of California, utilizing experimental, immature technology that to date has no field testing data or detail revealed to the public in the DEIR that would account for effectiveness in safely mitigating methane. There is no mitigation onsite for the BTEX and H<sub>2</sub>S that is known to exist onsite in levels that area, including levels that are above OSHA regulations for a worksite, let alone a residential scenario. There is no medical data or detail included in the CLA Report or the DEIR that addresses the toxic components of the oilfield gases, including BTEX and H<sub>2</sub>S. These toxic issues must be considered and addressed with detail and data as a basic element of an EIR.

**Response 35-21**

The basis for the commentor's remarks on "experimental immature technology" is unclear. Details of the methane mitigation system design and operations are addressed in Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 738 and Topical Response TR-12, Soil Gas, on page 477. There is extensive data on BTEX and hydrogen sulfide at the Proposed Project site and potential health risks associated with BTEX and hydrogen sulfide were addressed in Subsections 2.2.4.1.2.1 and 2.2.4.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 707 to 713. Please also see Response 35-19.

**Comment 35-22****BIOTIC**

The 3-day biological survey used for the DEIR is insufficient and inadequate to determine the true impacts of the project upon the environment. We have attached comments regarding an Environmental Assessment (EA) done for the entire Playa Vista site. This fairly recent EA is thoroughly insufficient for use as an ecological assessment and thus inadequate for use in an EIR. Please respond to the comments attached as part of the EA response from Grassroots. The authors of the EA state that an ecological assessment of the Phase 2 area as well as other portions of the Playa Vista site was untenable due to the construction activities.

The early biological studies of the site area and region should be utilized, some of which are included in the 1st Phase EIR. Please respond to these issues.

**Response 35-22**

Section IV.D, Biotic Resources, of the Draft EIR did not rely upon a 3-day field survey. Instead, as stated at the beginning of Subsection 2.2 of Section IV.D, Biotic Resources, of the Draft EIR on page 526, the analysis also considered results from numerous previous surveys conducted over a period of about 30 years. These studies are listed in Table 2-1 of Appendix G-2 of the Draft EIR.

The Ecological Assessment of Areas B and D of Playa Vista was not used in the Draft EIR. It was performed at the request of the RWQCB and the U.S. EPA. As noted by the commentor, a full ecological risk assessment of Areas D and B at Playa Vista was premature given the changing conditions in these areas, including the recent construction of the Freshwater Marsh.

### **Comment 35-23**

When Notice of Preparation was issued the land should have been protected under CEQA by Playa Capital and the City in order to conduct the necessary biological review. When the Jan. 14, 2003 NOP was released, Grassroots was in contact with the State of California, Department of Fish & Game regarding the Playa Vista riparian corridor and the Phase 2 area. At this time, much of the areas just cited were ponding with seasonal rains and discoveries of fairy shrimp in Ballona were occurring. State Fish & Game had been asked by Grassroots and other groups to consider reevaluating the areas cited above for current biological value and for wetland/upland habitat value. Unfortunately, during this timeframe, Playa Capital instigated water pumping activities on Phase 2 and stockpiling/surcharging (without permits) activities on Phase 2. The ponded water quality issues were left unstudied as well as habitat destruction occurred, precluding further habitat and hydrology study. We believe that the construction activities on Phase 2 to be illegal under CEQA and would like the EIR for Phase 2 to address the legal ramifications of the Playa Capital construction activities on Phase 2 after the 2003 NOP was issued. By way of example, in Palos Verdes, very recently in 2003, the public stopped what was considered to be illegal mowing activities on property that had received a NOP and thus was undergoing environmental review for an EIR.

### **Response 35-23**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

As discussed in Subsection 2.1.2.2 of Section IV.D, Biotic Resources, of the Draft EIR on page 525-526, “[i]n 1991, the CDFG issued a Streambed Alteration Agreement to the Applicant’s predecessor, which allows for the fill of the 16.1 acres of isolated and degraded wetlands as identified in the Corps Section 404 Permit within the Proposed Project area and the adjacent Playa Vista First Phase Project. This permit has been extended through June 2008.” As a result, a new state delineation is not required. Furthermore, the Proposed Project site does not contain habitat for fairy shrimp. (See Appendix G of the Draft EIR, in particular the reference to 2000 Glen Lukos Associates Habitat Assessment.)

The remaining comments are noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

**Comment 35-24**

EXCAVATION/FILL Pg. 17 I Executive Summary G. Summary of Project Impacts

The DEIR states that during construction, physical impacts would be less than significant because grading activities would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructures or expose people to substantial risk of injury...

TO THE CONTRARY, substantial damage would be and has been ongoing through the construction activities that has capped through surcharging or stockpiling, areas of known yet unstudied gas migration and H<sub>2</sub>S areas. The effect of such capping places the public at great risk as these areas need to be studied, as stated by the City's peer reviewer—ETI. Excluding these areas from prudent study precludes understanding the gas and H<sub>2</sub>S pathways and thus any potential mitigation which puts the ecology and public at great risk directly as a result of the ongoing construction activities.

**Response 35-24**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

As discussed in Section 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-716, the LADBS's independent peer reviewer, ETI, designed and completed a soil gas survey consisting of 812 sample locations placed on a 100 foot staggered grid over the adjacent Playa Vista First Phase Project Site and onto the Proposed Project site. Subsequently, over 200 additional locations were sampled in the Proposed Project site pursuant to a sampling protocol developed in consultation with and approved by LADBS and ETI. These studies provide a baseline of soil gas data. In addition to these baseline assessments, as described in Subsections 2.1.3.3, 3.4.4 and 4.0 of Section IV, Safety/Risk of Upset, of the Draft EIR, on pages 669-670, 732-33 and 738-739, respectively, and Appendix J-14, prior to issuance of building permits, prospective builders will complete additional soil gas assessments. See also Topical Response TR-12, Soil Gas, on page 477.

**Comment 35-25**

WATER/ HYDROLOGY

The DEIR contains no consideration of hydrological pathways of oilfield gas migration. Please provide data and detail regarding how the hydrology of the area, including tidal action and

dewatering effect potentially significant negative effects upon the oilfield gas migration pathways. Please include onsite and offsite ramifications.

The DEIR provides insufficient/inadequate data and detail regarding dewatering of the Phase 2 site and the Phase 1 site, including cumulative effects of dewatering regarding subsidence, toxic plume expansion, well bore and piling integrity and gas mitigation system integrity. There is no data to support the conclusions rendered in the DEIR.

The DEIR states that the project will have less than a significant impact because the groundwater in the area is not pumped for potable water. This comment is inadequate and nonresponsive because there is no reference to water quality standards that must be met in the near future (TDLs) and because fundamentally, the groundwater is already classified as a Potential Drinking Water Source under the Basin Plan and as such cannot be further degraded in any way and instead must be remediated. The expected, perpetual dewatering necessary to keep the gas mitigation pipes (potentially including the 50' vent wells) has not been addressed in the DEIR as it relates to subsidence, toxic plume draw, impacts upon well bores and pilings and the legal export of the water that must be cleansed prior to release. Please address these issues with clear detailed information with data support.

### **Response 35-25**

Subsections 2.2.4 and 3.4.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-715 and 727-728, respectively, contain an extensive discussion regarding soil gases, including hydrogen sulfide and BTEX. Please see also Topical Response TR-12, Soil Gas, on page 477. See also Response 35-14, above.

The Draft EIR summarizes the proposed dewatering activities in Subsection 3.4.1.2 of Section IV.A., Earth, on page 252. The water table at the Proposed Project site occurs at an elevation that is above the base of some of the proposed excavations and permanent structures at the Proposed Project site. These facilities may require that the fine grained, typically low-permeability strata of the upper Bellflower Aquitard be dewatered. All construction and permanent building dewatering will occur within the upper portions of the Bellflower Aquitard. No deep dewatering wells will be utilized (see Appendix F-1 of the Draft EIR on pages 2-37).

In addition to construction and permanent building dewatering, if necessary, groundwater may be extracted within the Proposed Project site for remediation purposes. The need for ground water remediation within the Proposed Project site will be determined by the Regional Water Quality Control Board (RWQCB) in accordance with Cleanup and Abatement Order No. 98-125.

As discussed in Subsection 3.4.1.2 of Section IV.A, Earth, of the Draft EIR on page 252, any dewatering that becomes necessary for construction on-site will be done in accordance with a dewatering permit obtained from the RWQCB (for flows ultimately reaching the Ballona Channel) and/or an Industrial Waste Discharge Permit issued from the City of Los Angeles Bureau of Sanitation (for flows entering the sanitary sewer). The requirements of the dewatering permit include monitoring and reporting of the quantity and quality of dewatering discharge, as



appropriate and necessary. Please see Section II.3, Corrections and Additions, of the Final EIR, for a revision to the dewatering mitigation measure.

As stated in Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 737, prior to issuance of a grading permit or B-Permit for activities involving construction dewatering, evidence shall be provided to the LADBS or LADPW, as appropriate, that a valid NPDES or Industrial Waste Discharge permit is in place. The NPDES or Industrial Waste Discharge permit shall provide for evaluating the groundwater for potential contamination, and, if necessary, the need for treatment of dewatering discharges.

Currently, construction dewatering activities in the adjacent Playa Vista First Phase Project are regulated under NPDES Permit #CAG994004 and Industrial Waste Discharge Permit #W-502105. The existing NPDES permit #CAG994004 and the existing Industrial Waste Discharge Permit #W-502105 (or alternative future permits), may be used for Proposed Project dewatering.

In accordance with NPDES Permit #CAG994004, the Applicant is authorized to discharge groundwater from dewatering activities to the storm drain system at three onsite locations. Treated groundwater ultimately flows to Ballona Channel; therefore, the effluent discharge limitations imposed by NPDES #CAG994004 under “Other Waters” and “saltwater waterbodies” are applicable to the discharge. Testing of the treated water prior to discharge is performed by a California-certified environmental laboratory in accordance with the monitoring program specified in NPDES Permit #CAG994004. In accordance with Industrial Waste Discharge Permit #W-502105, the Applicant is authorized to discharge groundwater from dewatering activities to the sanitary sewer. The Industrial Waste Discharge permit specifies effluent discharge limitations that must be met prior to discharge. Under both the NPDES and Industrial Waste Discharge Permits, the Applicant maintains groundwater treatment facilities on-site to ensure dewatering discharge meets applicable regulatory criteria.

As discussed in Subsection 3.4.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 726, the permanent dewatering systems that may occur would be “contingent” systems that would operate only when groundwater elevations occur at the level of the dewatering pipes. Drainage pipes will be connected to a sump to maintain the groundwater level at the target elevation. The water from the sumps will also be subject to the water quality requirements included in the NPDES or Industrial Waste Discharge permits for the development, as applicable.

As stated in Subsection 2.2.3.2.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 683, future remediation plans within the Proposed Project site may include groundwater extraction for remediation purposes. The need for groundwater extraction within the Proposed Project site for remediation purposes, if necessary, will be determined by the RWQCB in accordance with CAO No. 98-125. As stated in Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 737, groundwater extracted for remediation shall be conducted in accordance with RWQCB and other agency requirements (i.e., LADBS, Los Angeles Department of Public Works, etc.), as appropriate.

As stated in Subsections 3.4.1.2 and 3.4.2 of Section IV.A, Earth, and IV.I, Safety/Risk of Upset, of the Draft EIR on pages 252 and 726, respectively, significant adverse impacts are not anticipated relative to the rate or change in the direction or movement (migration) of existing contaminants in groundwater from dewatering associated with operation of the construction or permanent dewatering systems. This is because the maximum flow of the dewatering pipes is very low and their radius of influence on the groundwater unit is expected to be limited. Therefore, the dewatering pipes are not anticipated to draw water across any substantial distance, and impacts would be less than significant.

Construction and permanent dewatering will be restricted to the upper portion of the Bellflower Aquitard, with no significant impact to underlying aquifers. The minor local change in water level is not expected to have a significant potential to impact gas migration in the subsurface or the performance of the mitigation systems.

Please see also Responses 35-5, 35-14 and 35-17 above.

### **Comment 35-26**

No data is provided to demonstrate effectiveness of clean-up of the toxic plumes. To the contrary, since the 1993/5 EIR, the toxic plumes have not been remediated and plans to remediate the plumes from the 1993/5 EIR have either not been implemented or the attempts to remediate have failed. Many of the 1993/5 EIR plans for pumped and remediated water have failed to occur as promised, including water source for the riparian corridor and freshwater marsh. There is no showing that the LARWQCB or Playa Capital have any intention of following through with measures of the 1993/5 EIR thus, there is no means for ensuring follow-through or accountability with plans listed in the DEIR.

### **Response 35-26**

Remediation of the groundwater plume is discussed in detail in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 666. Please also see Response 35-11.

### **Comment 35-27**

The DEIR cites dewatering will have the oversight [*sic*] of the LARWQCB. However, what the DEIR fails to reveal is that the LARWQCB only has jurisdiction over water quality and only some chemicals that pertain to water quality. For instance, the LARWQCB does not review/provide for human or ecological safety to hydrogen sulfide (H<sub>2</sub>S). The LARWQCB while citing H<sub>2</sub>S presence in virtually all of its quarterly groundwater monitoring reports, the LARWQCB has stated it does not deal with hydrogen sulfide and has not quantified the H<sub>2</sub>S it regularly notes in its groundwater monitoring reports. The LARWQCB, though it is considered the LEAD AGENCY at Playa Vista, does not handle or have jurisdiction over oilfield gases. Thus when the

LARWQCB has issued NO Further Action necessary (NFA) to Playa Capital regarding contaminants and mitigation at Playa Vista, the NFA is critically misleading to the public's health and safety as the LARWQCB does not disclose to the public (and neither does Playa Capital) that many contamination issues, including the oilfield gases, are beyond their jurisdiction and thus there is no independent State oversight for human health and safety regarding the oilfield gas migration hazards. The LARWQCB'S limited response to the CLA Report regarding the oilfield gas hazards was written by the subcontracting Office of Emergency Health Hazard Assessment (OEHHA) who has no oilfield expertise and who was only given limited data and not the available data to come up with its conclusions regarding the toxic elements of the gas. The Secretary of CAL EPA, Winston Hickox, wrote a recent letter to Grassroots stating that State EPA has no oversight of oilfield gas issues. The lack of independent State or Federal oversight for protocol of studies performed thus far, has created controversy within CAL EPA that is still unresolved and has allowed Playa Capital and its paid consultants, to purport conclusions that are highly questionable and are lacking in critical issues being addressed.

### **Response 35-27**

The Draft EIR summarizes the proposed dewatering activities in Subsection 3.4.1.2 of Section IV.A, Earth, on page 252. Dewatering may be required for temporary construction dewatering or for permanent water control to maintain groundwater below subterranean parking structures and associated methane mitigation systems. All dewatering discharges will be done in accordance with a permit obtained from the RWQCB or the City's Department of Public Works. Please see Section II.3, Corrections and Additions, of the Final EIR, for the revision of the dewatering mitigation measure contained in the Draft EIR.

As stated in Subsection 2.2.3.2.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 683, future remediation plans within the Proposed Project site may include groundwater extraction for remediation purposes. The need for groundwater extraction within the Proposed Project site for remediation purposes, if necessary, will be determined by the RWQCB in accordance with Cleanup and Abatement Order No. 98-125.

As stated in the September 16, 2003, letter from the California Environmental Protection Agency Secretary, Winston Hickox, to Grassroots Coalition (see the Appendix to the Final EIR), the RWQCB and the DTSC do not have regulatory authority or jurisdiction over naturally occurring methane or oil field gas issues. Secretary Hickox further noted that "the City of Los Angeles, Department of Building and Safety and the State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources have authority over the oilfield gas issues." The Department of Building and Safety has authority over methane gas issues only. Methane assessments at building sites within the Proposed Project site will be performed pursuant to methodologies approved by the Department of Building and Safety. See also Topical Response TR-12, Soil Gas, on page 477.

The remaining comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 35-28**

The EIR should reflect all the available information as it is a disclosure document to the public. Without full disclosure, there is no means that is available to the public, to make an informed decision.

**Response 35-28**

The Draft EIR is composed of 27 volumes including 16 Appendices and a reference library of over 300 documents. It discloses all relevant and available information and is legally adequate as a disclosure document.

**Comment 35-29**

Attachment for Playa Vista Phase 2 DEIR  
Attachment 1  
Regarding Insufficiency of Phase 2 Environmental/Biotic Assessment

August 15, 2003

TO: LARWQCB

Mr. Adnan Siddiqui, Project Manager  
Mr. Dennis Dickerson, Executive Officer  
320 W. 4th Street, Suite 200 LA CA 90013  
fax 213 576 6717

FROM: GRASSROOTS COALITION,  
Patricia McPherson, President  
3749 Greenwood Ave.  
LA CA 90066 310 397 5779

RE: ECOLOGICAL ASSESSMENT OF AREAS B AND D PLAYA VISTA, 6775  
CENTINELA AVENUE, LOS ANGELES, CALIFORNIA

Dear Mr. Siddiqui,

It is unclear what the LARWQCB wishes to accomplish through the Camp Dresser McKee (CDM) ecological assessment (EA) because of the multitude of issues that are not addressed within the assessment, including but not limited to the newly discovered oilfield gas migration issues and hazards. Specific conclusory statements made within the EA are, in the main, not backed up with any data support which is contrary to any scientific study. The LARWQCB has no expertise in the ecological aspects of the site and the LARWQCB has not shared the EA with state agencies such as CA. Fish & Game. The EA authors, Mr. Gendusa, Mr. LaVelle and Mr.

Coleman acknowledge in multiple locations within the EA that an ecological assessment is untenable because of 'transition' (pg ES-1) of the properties due to ongoing development and construction activities. The authors further cite that a 'solid data base' (pg. ES-1) will be developed in the future.

Doing any ecological assessment or oilfield gas study requires soils that have been undisturbed and habitat left in place for it to be evaluated. The LARWQCB provides for neither of these conditions at the Playa Vista site. It is disturbing that an area such as Phase 2, which is undergoing current environmental review, is, at the same time, allowed to be massively destroyed through construction activities. The '93 and '95 EIRs were done during drought years, conditions since then have changed and normal rain conditions have returned. However, the Phase 2 area, which could be reevaluated for its wetland aspects was instead, allowed to be destroyed this year through surcharging, excavation and fluid withdrawal/dredging. The fluids that were removed had no ostensible testing. Grassroots, State Fish & Game and DTSC have repeatedly asked for such test results and have never received any test results.

The LARWQCB, as a lead agency for oversight, does not provide any meaningful oversight for construction activities taking place. The LARWQCB, while it does request, at times, that certain piles of soil not be placed in areas undergoing environmental review, the LARWQCB contradicts itself because it does not follow up as to where those soils end up. While the LARWQCB appears to concern itself with some small piles of earth, it provides no requests or requirements to not allow massive construction ie. [*sic*] surcharging, stockpiling and excavation activities in areas undergoing Environmental Impact Review (EIR).

The LARWQCB has not provided, and does not have the expertise to provide, any oversight regarding the newly discovered oilfield gas migration hazards. The LARWQCB has not cooperated with requests made by its sister agency the Department of Toxic Substances Control (DTSC) to ensure that oilfield gases are sampled in native soils (soils that have been undisturbed).

Grassroots would like to be able to address every specific of the EA but would first like the LARWQCB to respond specifically to the issues already raised by Grassroots. These issues have not been responded to, in writing, by LARWQCB and Grassroots requests that LARWQCB respond specifically, in writing.

Thank you, Grassroots Coalition, Patricia McPherson

P.S.

The LARWQCB has put, in writing, that it would request of Playa Capital, studies regarding subsidence that could potentially result from any pump and treat on the site and that hydrogen sulfide found would be quantified. However, after a recent file review, it is clear that the LARWQCB has no subsidence studies or quantification of hydrogen sulfide (H<sub>2</sub>S) found onsite. It is also clear, from the file review that hydrogen sulfide continues to be found onsite and that certain remediation sites must utilize a pump and treat. Therefore, it appears that the LARWQCB has been disingenuous regarding any fulfillment of requesting such information.

**Response 35-29**

The attachment supports comments made in Comment 35-22. As such, this comment is addressed in Response 35-22.

**Comment 35-30**

Attachment for Playa Vista Phase 2 DEIR  
Attachment #2  
Regarding Inadequacies of CLA Report

POTENTIAL SEISMIC AND LIQUEFACTION & LANDSLIDE RELATED  
HAZARDS AND RISKS OF THE PLAYA VISTA SITE;  
ONSITE & OFFSITE RAMIFICATIONS

REQUEST: A Review to Demonstrate Adherence to the Seismic Safety Hazard Mapping Act and Guidelines of Special Publication 117

**PURPOSE of the Chief Legislative Analyst Report**

The Report came as a result of a City of Los Angeles City Council, Budget & Finance Committee Hearing, 6/7/00, with City Council members Michael Feurer (Attorney) & Cindy Misicowski (who has since been disallowed to vote on matters regarding the Playa Vista site due to potential conflict of interest because of her family's current development interests in the adjacent properties to Playa Vista). These two people, utilizing counsel from the City Attorney's Office came up with a Playa Vista study proposal that would resolve potential environmental issues that were not addressed in the '93-'95 EIR. The proposal was later approved by the full City Council, and was called a 'pseudo CEQA' process, an investigation of the Playa Vista site that would, "...get to the best possible extent real information that's extensive, that addresses the outstanding issues in a way that allows for meaningful public input and enables us as decision-makers to feel confident that we have the universe of relevant information from public, people from consultants, from the City staff and make a decision. That's what this is about-is do we have all those features in it and we're trying to do that in a way that's clear and understandable to members of the public and to City officials as well." Councilman Feurer 6/7/00 LA City Council Budget & Finance Committee Hearing transcript

Re: the CLA Office and handling the investigation:

"The charge is to get the data through whatever means the team feels is appropriate. I—many of our processes in the City including building permit processes rely in the first instance on what the project proponent submits and I think, while that information is relevant, it cannot be deemed as dispositive nor the only baseline set of data."

"it's not that the CLA possesses any specific expertise here but rather that that office is used to assimilating information from many sources,".....

Fuerer 6/7/00 LA City Budget & Finance Com. Hearing Transcript.

6/7/00 Cindy Miscowski Budget & Finance Hearing transcript, RE: SEIR vs pseudo-CEQA process,

“But I think that there is the intent at this point that this will be in essence more detailed and as equally public if not more so in terms of the kind of expertise and determinations will be made by our City staffs in reviewing any permit or allowing anything to go on there, how it will go on based on this informed, scientific, technical knowledge and then let everybody see it and choose what course they will take at that point.” Council person Miscowski

“And we sit down together with they each giving their input, bringing in expertise and it helps get to a point of conclusion that makes some sense in terms of being able to put them together and say ‘answer each other’s questions’ and that’s what I want in this arena—that process which will work well to get each other—each of you questioning each other or questioning the peer reviewer and/or the Playa Vista’s reports and/ or outside reports to say conclusively ‘here’s where our consensus is and we feel that we’ve really looked at all approaches.” Councilperson Miscikowski

#### RESULT of the CLA REPORT:

We believe that the resultant ‘CLA REPORT’ was deliberately unreasonable, poorly written, incomplete and biased, including conflict of interest. (Seven of the nine consultants listed on page iii CLA Report are Playa Capital consultants hired through the law firm of Lathim [*sic*] & Watkins. Lathim [*sic*] & Watkins also represents SOCALGAS. SOCALGAS continues to fail to produce requested data regarding their Playa del Rey/Venice operations, including well log data and native gas samples.

Kleinfelder, one of the City consultants, created its review from limited data provided through the City that was performed by ETI. The State EPA Dept. of Toxic Substances Control has stated that their health assessments of the BTEX and H2S of the site are incomplete and lacking in proper protocol for an adequate and prudent evaluation.

We believe that Exploration Technologies Inc. which has expertise in 4’ probe sampling, a preliminary gas evaluation technique, has been utilized by the City as expert beyond their realm of expertise, including gas mitigation review. ETI has stated in public that they are not gas mitigation specialists. The evaluation of an underground gas reservoir is also beyond the scope of expertise of ETI.

“A report that is incomplete or poorly written should be *not* approved. Dept. Conservation Special Publication 117.

“the working premise for the planning and execution of a site investigation within Seismic Hazard Zones is *the suitability of the site should be demonstrated.*” Pg. 10 Special Publication 117

We believe that there has been ***no demonstration that the site is suitable*** nor any mitigation measures that have demonstrated their ability to function as stated. We have continually asked for documentation to back up the viability of the mitigation systems and documentation to demonstrate that the systems will be able to withstand seismic activity in a liquefaction zone and none has been provided. Post-construction differential settlement is expected onsite yet, there is no accountability for how the settlement will effect [*sic*] the integrity of gas mitigation systems. No evaluation has been done of how the high water table or moisture will potentially effect [*sic*] the gas monitoring systems.

RULE 10b-5, 17 C.F.R.—240.10b-5, provides, “It shall be unlawful for any person.....to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made... not misleading....”

a. .... “fail to reveal material facts that were known or which, but for a deliberate refusal to become informed, should have been known.” Arthur Yound, 590 F.2d at 788-89.

b. We recognize that municipal issuers are not subject to the same filing requirements imposed on underwriters, dealers, and brokers of other securities. See 15 U.S.C.—78o-4(d) (1994), Pursuant to the Tower Amendment, an issuer of municipal securities is not required to file any application, report or document with the SEC or the MSRB in connection with the issuance of a security. 15U.S.C. – 78o-4(d)(1). HOWEVER, WHEN STATEMENTS ARE MADE IN connection with the offering of a municipal security, those statements must be true and cannot omit material facts. See *Sonnenfeld v City and County of Denver*, 100 F.3d 744, 748 (10th Cir. 1996) (“Congress also clearly intended that municipal securities would remain subject to the antifraud provisions.”), And, the duty to conduct a reasonable investigation remains.

The above information is from the *DAILY APPELLATE REPORT* June 27, 2001.

WE believe the true purpose of the CLA Report was to downplay the environmental hazards, mislead potential investors (because only what is in the Report is within the bond documents), the public and potential future occupants by misrepresenting the Playa Vista site environmental conditions and the technology being either designed or utilized at the site (that is deemed by the City and its consultants to render the site ‘safe’).

1. WE believe that the standard of care of conduct goes beyond industry practice and instead must include the more expansive standard of REASONABLE PRUDENCE for which the industry standard is but one factor to consider.
2. We believe there was a reckless failure to investigate.
3. WE believe that the CLA REPORT over-all and many of it key representations, misrepresents and fails to reveal material facts the consultants knew or which, but for a deliberate refusal to become informed, should have known.



In order to forward the Project, the bond moneys were needed. In order to secure the bond money, the CLA Report needed to grant the site's 'safety' in order for the LA City Council to allow the sale or disbursement of bond money for the Playa Vista site. This has all since taken place and we, having acted in good faith by warning the City about Playa Vista site hazards and risks and having provided voluminous documentation in the aforementioned process of warnings, are left with non-responsive City departments and LA CITY COUNCIL.

We are asking, for a full review of the CLA REPORT, including various integral evaluations within that report done by various licensed evaluators.

Letters of Complaint and Request for Investigation of Conclusions Rendered in the City of Los Angeles's – Chief Legislative Analyst's Report (CLA Report) Regarding Geotechnical Hazards of the Playa Vista Site, Los Angeles California.

PLAYA VISTA—The Dept. of Conservation Seismic Hazard Map displays the Playa Vista site as a Potential Liquefaction Area, and having potential landslide problems within the bluff area and that the Playa Vista area is seismically active.

Therefore, a geotechnical report review is needed for the fulfillment of the SEISMIC HAZARD MAPPING ACT and Public Resource Code 2690- 2699.6, the Seismic Hazard Mapping Act Chapter

#### Reviewing Reports

The reviewer performs four principal functions in the technical review:

- Identify any known potential hazards and impacts that are not addressed in the consultant's report. The reviewer should require investigation of the potential hazards and impacts;
- Determine that the report contains sufficient data to support and is consistent with the stated conclusions;
- Determine that the conclusions identify the potential impact of known and reasonable anticipated geologic processes and site conditions during the lifespan of the project; and,
- Determine that the recommendations are consistent with the conclusions and can reasonably be expected to mitigate those anticipated earthquake-related problems that could have a significant impact on the proposed development. The included recommendations also should address the need for additional geologic and engineering investigations (including any site inspections to be made as site remediation proceeds).
- SPECIAL PUBLICATION 117—Guidelines for Evaluating and Mitigating Seismic Hazards in California 1997 Department of Conservation Division of Mines & Geology

#### GEOLOGIST & GEOPHYSICIST ACT

Rules and regulations, 1999

3065. Professional Standards.

“To protect and safeguard the health, safety and welfare of the public, every person who holds a registration issued by the board shall comply with all applicable laws, codes, and regulations and shall comply with professional standards in this section. A violation of any of the following professional standards in the practice of geology or geophysics constitutes a ground for disciplinary action:....” Pgs. 41, 42, 43 exhibit B

After calling the Dept. of Conservation and discussing guideline issues , we were advised to address our concerns to the State Geologist as well as submit a complaint for review work done for the CLA Report. This presents a bit of confusion as some scientific conclusions rendered in the CLA Report appear to have no scientific basis nor any individual who has rendered the conclusion. The final CLA Report—May 31, 2001, in particular, is very vague, it is not clear who is speaking and rendering conclusions.

PLEASE ADVISE.

LADBS—David Hsu, head of grading division approved various reports used by the CLA Office (we are not aware of anyone within the CLA Office that has any scientific credentials) the City Geologist, Dana Prevost as part of the Grading Division.

Mr. HSU

Mr. PREVOST

Mr. Andrzej Szpikowski (Geotechnical Engineer)—’was not given key information for his reviews’ LA PUBLIC WORKS—We believe that Mike Michalski of Public Works, Engineering did the review work for the subsidence conclusions rendered.

MICHALSKI—

The Gas Mitigation System approval by LADBS—it is not clear who is responsible for the approval of the Sepich system [*sic*] It appears to be Hsu signing on behalf of the City. If it is necessary for us to create another complaint for J. Sepich himself, please notify us.

There does not appear to be anyone qualified to review the methane mitigation system.

DECEMBER 8, 1999—HEARING before the LA City Council, Housing and Community Redevelopment Committee, (exhibit is excerpt of LA City Tape of hearing—EXHIBIT 1)

LADBS, LA PUBLIC WORKS—ENGINEERING, LA FIRE DEPT., LA PLANNING DEPT., all expressed their lack of expertise with regard to the oil/ gas field problems of the Playa Vista site.

Having expressed their lack of expertise with the oil field gas situation, the City Depts. expressed their mutual need to defer to Exploration Technologies Inc.’s experience for a peer review process, the licensed professionals of the City create additional concerns for us. ETI is not a gas mitigation specialist Company. ETI was hired to perform 4’ soil probes for methane. The City then loosely utilizes ETI beyond the scope of their expertise to characterize the entire Playa Vista site for various issues. It becomes difficult to ascertain who has the adequate background to make the multiplicity of conclusions that are made in the CLA Report. Furthermore, due to the

available, voluminous data that LADBS and other city departments and subcontractors do not address or respond to, the report becomes bogged down in irrelevant or misleading issues and does not satisfy requirements of the Seismic Safety Hazard Guidelines, Special Publication 117. There also appear to be violations of the rules and regulations of the Geologist and Geophysicist Act (1999).

#### ATTEMPTS TO RECONCILE/ WORK WITH CITY:

We brought the oilfield gas issue to the attention Los Angeles Building & Safety Department—1998. We addressed concerns related to oil field gas migration problems in the ‘93-5 EIR for Playa Vista. Subsequently we discovered gas bubbling up in Centinela Creek, adjacent to the site and brought this to the City Council’s attention. After 5 years of asking for a SEIR to be performed on the Playa Vista site and being ignored by a non-responsive LA City Council, we took the same information as well as a report done by Playa Capital Consultants that we found (ENSR Report 1997) at the State EPA, California Regional Water Quality Control Board (CRWQCB) in 1998, to the LADBS who acted upon the data by promptly requiring Playa Capital to perform soil gas sampling. We requested a ‘peer review’ of all studies and were not able to achieve a full peer review panel. However, Exploration Technologies Inc. (ETI) was decided upon, by Playa Capital and the City, to act as a sort of single source ‘peer review’. They were hired by the City, paid for by Playa Capital to perform an initial 4’ soil sampling analysis for the presence of methane. ETI is not a methane mitigation expert, their expertise has been in doing preliminary 4’ probes. Now that it has been established that high levels (80-90% by volume) of oil field gas are migrating to the surface from super saturated underground areas, further analysis should include, as in the Fairfax area, deep probes that remain in place in order to determine gas migration pathways and flux over a long period of time.

We continued to provide the City with a “Library” of scientific literature to demonstrate how a prudent scientific assessment should take place in the active oil field setting, as well as scientific literature on products being utilized for the site. We also provided findings from various sources as we participated in the Playa del Rey/Venice-SOCALGAS investigation, which includes our instigation of the California Public Utilities Commission investigation into SOCALGAS-PLAYA DEL REY/VENICE ACTIVE OIL/GAS FIELD OPERATIONS. (EXHIBIT 2)

Recently, due to our knowledge of dangerous building practices taking place and our concerns for public health and safety issues that needed to be addressed, we called for a stop-work on the project until the issues were resolved. We were heard before the LA Building & Safety Commission—April 10, 2001, and were given written instructions that we would be able to examine Dept. witnesses regarding our findings and concerns. At the hearing, we were denied any right to examine Dept. witnesses and our findings and issues of concern were not addressed. We were simply dismissed with no explanations or disclosure. (EXHIBIT 3- B& S Comm. Documents)

The City has become totally non-responsive. Further, our Public Record Requests have been denied on an ever increasing level. The CLA Report has been approved by the City Council, despite our protestations in writing regarding issues contained in this request. We are ignored as

the City continues to be non-responsive. There is no accountability for the City's actions and no accountability from its licensed and registered professionals. Therefore, we are forced to ask for the CLA Report to be reviewed by the State, in our attempt to achieve response and accountability. The public health & safety concerns we are attempting to have addressed are gravely serious and have enormous consequences.

## BACKGROUND

The PLAYA VISTA site, currently under construction, is set in the coastal historic Ballona Wetlands valley, roughly a little over 1,000 acres. It is situated over and adjacent to the active Playa del Rey-Venice oil/gas field. SOCALGAS is the operator of the Playa del Rey/Venice oil field and part of that operation is the underground gas storage reservoir. The oil/gas field, as in previous oil field fluid production years, continues to produce fluids. 2500 barrels of fluid are withdrawn daily for gas storage operations. The California courts have ruled that this conduct is considered an ULTRAHAZARDOUS activity. See *Travelers Indemnity Co. v City of Redondo Beach* (1994) 28 Cal. App. 4th 1432, 34 Cal. Rptr. 2d 337. The area is classified by USGS as a subsidence prone area due to oil field fluid withdrawal. According to the Division of Oil & Gas 60th Annual Report—the Chart reveals nearly 2' of subsidence as having occurred due to oil field fluid withdrawal by 1970. The last subsidence study performed upon the area was in 1970. The DOG chart reveals the subsidence as continuing. (EXHIBIT 4)

SOCALGAS owns all of the mineral rights below 500'. The 80-90% by volume of oil field gases migrating to the surface in the Playa Vista site, are from below 500'. By law, SOCALGAS is responsible for the gas.

An expert, gas inventory review, performed for SOCALGAS by Racine Tek, PhD., determined that massive leakage occurs throughout the reservoir. Tek has stated that the reservoir leakage is approximately 1- 1 1/2% of its inventory, per year. Furthermore, Tek determined that discharge of benzene from the oilfield was also occurring. (EXHIBIT 5)

The California Public Utilities Commission is currently conducting an investigation regarding the PDR/Venice oil/gas field and underground gas storage operations of SOCALGAS. The investigation is the result of community complaints concerned with unsafe operations of the PDR/Venice oil/gas field. It is also a follow up of the investigation undertaken by the CPUC of similar problems that have existed at the Montebello-SOCALGAS gas storage operations, which had to be shut down due to gas leakage losses along the oil field well bores. Montebello gas leakage problem resulted in homes and city buildings being torn down in order to address the leakage. No redevelopment is to take place as SOCALGAS has established that wide buffer zones are necessary to allow for gas migrational losses. ATTACHMENT A

The Playa Vista site has been described by ETI as the largest oil field gas seep in the world.

Los Angeles is the only city in the U.S. attempting to place a massive new urban development over and adjacent to a highly pressurized underground gas reservoir within an oil field setting. There are over 300 gas reservoirs across the U.S. located in various geologic formations.

The Playa Vista development has been characterized by LA City Bond documents as the largest infill project in the United States.

The site cannot be remediated as it will perpetually outgas the underlying oil/gas field gases. There is no site that has been demonstrated to be comparable to the multiple geotechnical difficulties of the Playa Vista site. No comparable site has ever been mitigated to serve as a model for demonstrating and ensuring reasonable safety will be accomplished for the Playa Vista site.

The mitigation techniques offered for Playa Vista are untried and untested experiments as acknowledged by the LADBS General Manager, Andrew Adelman to Councilperson Nate Holden's query, asking if the mitigation techniques were experimental during the June 12, 2001 City Council meeting. At the hearing, LA Building & Safety's General Manager, Andrew Adelman answered, "yes" to Councilman Holden's question.

Adelman, in City documents in the CLA Report, describes the mitigation measures as being in a "progressive design stage". MEANWHILE, CONSTRUCTION IS TAKING PLACE.

No accountability for safe performance of any of the mitigation has been demonstrated or documented to the public.

None of the 'Library' of information we have provided to the City of LADBS and hence the CLA Office was included in the CLA Report. The 'Library' of information included California Public Utilities investigation documents of SOCALGAS-Playa del Rey/Venice field as well as SOCALGAS documents secured through ongoing litigation between SOCALGAS vs. L. Stadish.

#### GAS HISTORY:

During 1998-9 the City became aware, through volunteer citizen investigation, that Playa Capital, the developer's [*sic*] of the Playa Vista site, had not revealed knowledge of oil field gas migration contamination of the site that was, in part, demonstrated in one of Playa Capital's consultant reports, that we provided to the LABDS—the ENSR REPORT (Oct. 1997). Further evidence of oil field gas migrating into a near-by channel of water—Centinela Creek, that was also provided by the citizens, led the Los Angeles Dept. of Building & Safety to require Playa Capital to perform soil gas evaluations. The subsequent investigations confirmed the presence of extremely high levels of oil field gases migrating throughout much of the site.

Further, as the City Building & Safety Commissioners became aware, during hearings, that many of the permits already given by LABDS were granted utilizing misleading information supplied by Playa Capital,

Commissioner Chang, "There have been a lot of allegations and false and misleading information presented in order to obtain permits. And some of those statement are of grave

concern to us on the Board.” Bldg. & Safety Commission Hearing Aug. 1, 2000; and that the current LA City Methane Code was inadequate,

“It [methane code] is not adequate, as we heard from testimony today, and we need to review that and implement that. And I know the procedure is lengthy, but we need to act on it as a matter of urgency.” Commissioner Chang, Aug. 1, 2000 B&S Comm. All transcripts are available—request.

The LA City Council became involved to further a new evaluation of the site—The CLA Report. Despite, acknowledgement among City officials that the old EIR was flawed and inadequate, the City refused a public’s request for a SEIR and instead claimed a CEQA-LIKE PROCESS would be performed. The supposed CEQA-like process was never fulfilled. The CLA Office process, unlike the CEQA process, has provided no safeguards for accountability. The CLA Report process allows the City to be non-responsive to public inquiry and non-responsive to critical issues. Data to back-up conclusory statements is missing.

We believe that it is important to note, that due to a proposed elementary school site at Playa Vista, as well as concern for current surrounding school sites, Los Angeles Unified School District’s Safety Team asked for the immediate involvement of the State EPA’s Dept. of Toxic Substance Control (DTSC) to become a member of the CLA Task Force and its review of the Playa Vista site. The CLA Office did not allow for the participation of DTSC. (EXHIBIT 6)

“This task force should include, but not be limited to, the following agencies:

.....Other relevant City, County and State agencies”

DAVID HSU, GRADING ENGINEERING SECTION, ENGINEERING BUREAU; ANDREW ADELMAN—General Manager LADBS June 5, 2000 letter to the Budget & Finance Committee

A further conflict is the CLA Office’s lead person, Ron Deaton. Mr. Deaton’s signature is on LA City documents that acknowledge the old, improperly capped wells of the Playa del Rey/Venice oil field. The unresolved issues surrounding all these old improperly capped and currently leaking wells appears to be the driving force to not acknowledge the Playa del Rey/Venice oil field gas leakage and H<sub>2</sub>S contamination problems as they affect the Playa Vista site. To acknowledge the ongoing SOCALGAS oil/gas field contamination of the Playa Vista site would invite scrutiny of the surrounding areas that are currently in danger. The City officials and Deaton refuse to address current oil field gas leakage in the Marina peninsula area and they refuse to address the lack of adherence to current Fire and municipal codes regarding the wells in the Marina peninsula area. The Marina area is also subject to liquefaction and seismic disturbance and is thus shown to be an area accountable to the Seismic Safety Hazard Mapping Act. New homes are allowed to be built over wells with no mitigation whatsoever. The LA Fire Code and Municipal Code require a 50’ distance from the center of a well casing to be left open. (exhibit 7)

The documents which site oil field problems are a continuation of LA City Planning Documents—File 15808 (1967- ), which demonstrate the City’s knowledge of the interconnectedness of the Venice and Playa del Rey oil/gas field and safety problems associated

with the connected fields. File 15808 reveals the City's knowledge of the shallow gas sands that the City in the '93, '95 EIR, explicitly stated as not existing and therefore not a threat to the Playa Vista site. (EXHIBIT 8) 1993-5 EIR of Playa Vista, "unlike the Fairfax area, there are no shallow zones or pockets of gas that could seep to the surface at the Playa Vista site." (EXHIBIT 9) This is data that we also included in our 'Library' of Data at LADBS and asked The CLA TASK FORCE to include. None was included in the Report.

Currently, all bond money releases for use at the Playa Vista site are contingent upon the CLA Report stating that the site is safe to build and that the site has no H<sub>2</sub>S concerns or other toxic oil field gas concerns. The entire Project's continuance is dependent upon the use of that bond money.

- We find the CLA Report to be poorly written, incomplete and not sufficiently thorough.
- The findings regarding identified hazards are incomplete and in some cases invalid and/or misleading.
- The Report fails to evaluate the nature and severity of the interconnected risks both onsite and offsite that are the result being located over and adjacent to an active oil/gas field. Various conclusions are rendered with no documentation or verification as to who is making the conclusions.
- It appears that the CLA Office itself is assuming the role of professional, certified or registered status in order to render such scientific conclusions themselves:
- The CLA Report fails to include critical, available information.

According to Special Publication 117, these are all reasons for NOT approving the Report.

The State of California, Environmental Protection Agency—The Department of Toxic Substance Control (DTSC) has become involved in the regional gas migration issues through our efforts as well as local concerned citizens. The DTSC has reviewed the CLA Report and stated that, "From the information that has been given, the HHRA(Human Health Risk Assessment) and the HBRG (Health-Based Remediation Goals) for the Playa Vista Development site are incomplete, and DTSC is requesting additional information as outlined in the attached comments." (DTSC exhibit 10)

#### ISSUES:

Issues that the Division of Mines & Geology may feel are beyond their scope of review such as oil field gas, are still issues which are inherent to safe buildings [*sic*] practices in a seismically active area with liquefaction, subsidence, and landslides as part of the geotechnical setting. Construction techniques, such as the use of friction piles, used to alleviate one hazard should not then create yet another hazard, which at Playa Vista one example would be the pilings acting as moving parts that will likely rip and destroy the integrity of any delicate gas membrane. The

seismic activity upon the mitigation systems in total must be taken into account. Furthermore, the Dept. of Conservation should be active in making sure that its varying Divisions, ie. [*sic*] Division of Oil & Gas, must also be held accountable for their roles as they relate to the health and safety issues of the Playa Vista site. The Division of Oil & Gas recommendations and statements must also adhere to the Seismic Safety Hazard Mapping Act. In so doing, the Division of Oil & Gas should have the data to back up its statements as well as be available for securing ALL NECESSARY WELL RECORDS AND OTHER DOCUMENTATION FROM SOCALGAS. It has already been demonstrated that SOCALGAS has withheld documents that are necessary for the safe evaluation of this area.

#### CLA QUESTION #1

Is the adjacent Southern California Gas Company Playa del Rey Gas Storage Facility leaking and, therefore, the source of the methane contamination on the site and a risk to workers and future residents?

CLA ANSWER: The Southern California Gas Company Playa del Rey Gas Storage facility is not the source of methane contamination found at the site. Furthermore, there is no evidence which suggests that the gas storage facility is leaking or improperly maintained. There is no evidence that the gas storage facility presents a danger to workers or future residents.

The question itself is flawed. Not only must the storage facility be considered but also the Playa del Rey/Venice oil field and its native gases. All methane/oil field gas is of risk to workers and future residents. It is still important to determine the source, pathways, flux and mixing of the oil field gas, which to date, have not been determined by the CLA Office.

LABDS, David Hsu renders the conclusion, “The report concerning the Playa Del Rey Gas Storage Field and the Lincoln Boulevard fault has been reviewed by the Grading Section of the Department of Building and Safety. According to the report, the ‘combined geochemical and geophysical information proves beyond a reasonable doubt that the methane gas seepage observed on the Playa Vista site does not come from the Southern California Gas Storage Field.’ The Department of Building and Safety accepts this conclusion.” DAVID HSU, CHIEF OF GRADING SECTION Jan. 31, 2001 (exhibit) letter to David Nelson, included in the CLA Report as APPENDIX C, Attach. 4. (EXHIBIT 11)

Please note that Mr. Hsu has inserted the language that we emphasize in bold italic. ETI did not used [*sic*] the same language as shown in the following excerpt and exhibit.

Please see EXHIBIT F—Jan. 31, 2001, ETI letter to Hsu in the CLA Report. (EXHIBIT 12) The letter discusses **PRELIMINARY INTERPRETATION** of the geophysical data. Also, neither ETI nor any consultant cited in the CLA Report, has discussed the isotopic ‘mixing’ of reservoir gas and native oil field gas therefore, a fundamental element of evaluation of the characterization of the surfacing gas has been completely left out of any of the analysis.

“Preliminary interpretation of the geophysical data from seismic profiles supports the premise that the methane gas found east of Lincoln is moving upward within a vertical zone of disrupted



strata from beds of the Pico Formation.” ..... “The gas seepage on the Playa Vista site appears to be derived from the Pico Sands at depth and does not have the geochemical signatures, characteristic of storage gas.” .....

“This combined geochemical and geophysical information supports that the methane gas seepage observed on the Playa Vista site does not come from the Southern California Gas Storage Field.” ETI-Jones/ Robbins Jan. 31, 2001, letter to Hsu, EXHIBIT F—CLA Report.

The origination of the oilfield gas is still not resolved as all of the data we supplied to ETI as well as LADBS and the CLA office was not utilized nor addressed.

Even the Dept. of Conservation, Div. Of Oil, Gas and Geothermal Resources (Division) reviewed the CLA Report and states, “The Division has not determined that the shallower Pico Sands are the source of the methane gas seepage either.” April 6, 2001, Kenneth E. Trott, Environmental Coordinator to R. Deaton. (EXHIBIT 13)

The Division also states, “Determining the adequacy of the proposed methane mitigation measures for the project is beyond the Division’s authority.” The CLA Report misleads the public in its whole-sale inclusion of the DOG ‘s [*sic*] response to the Report as somehow advocating the Project’s approval of safety. This is not so.

The DOG letter (Final CLA Report Appendix A) from District Deputy. Richard Baker to Vitaly B. Troyan, LA City Dept. of Public Works—Oct. 10, 2000 Re: SOCALGAS Storage Project Operations [*sic*] This letter describes the DOG’s oversight of the gas-storage project which delivers a rather favorable report of the Playa del Rey Facility. The letter however, should be acknowledged in light of further information regarding SOCALGAS’S and the DOG’s inter-relationship and current findings.

1. Rasin Tek, Ph.D (Professor Emeritus of Chemical Engineering at the University of Michigan), a world authority on underground gas storage systems and gas storage inventory. analysis, recently completed a detailed analysis of the SOCALGAS, Playa del Rey storage site. He determined that the rate of loss due to migration and/or seepage into the atmosphere is approximately 100 million cubic feet of gas per year. This is approximately 1-11/2% of the total inventory. (Exhibit 5 )

2. The SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES (2000) Stadish v SOCALGAS, includes on pg. 3, the Appellate Decision from Stadish v SOCALGAS pg. 8,

“AS FAR AS WE CAN TELL, NEITHER THE PUC NOR THE DOG HAS CONSIDERED FOR THE PAST 55 YEARS WHETHER RECONDENT’S OPERATION IS RELEASING POLLUTANTS INTO THE AIR OR GROUNDWATER WHICH ARE HARMFUL TO THE HEALTH AND SAFETY OF THE RESIDENTS IN THE SURROUNDING NEIGHBORHOOD.” (Exhibit 14)

3. The ongoing California Public Utilities Commission investigation of the operations of the SOCALGAS-Playa del Rey facility has not reached any conclusions regarding the safety of the field. The City's professionals have not included or addressed the materials of this investigation that we have given over to LADBS nor do they address the ongoing investigation.(exhibit 2 )

4. From the Stadish v SOCALGAS litigation as well as the ongoing California Public Utilities Commission investigation of SOCALGAS-Playa del Rey, it appears that pertinent records of SOCALGAS have not been given over to the DOG.

SOCALGAS operates the Playa del Rey/Venice oil/gas field. The gas storage operations are part of their operations. SOCALGAS owns the mineral rights below 500' to the underlying area and accordingly is responsible for the gas of the Playa del Rey/Venice oil/gas field. The surfacing gas in Playa Vista is oil field gas migrating up from below 500'. Therefore, SOCALGAS is responsible for the oil field gas that is migrating to the surface. Gas samples taken by Grassroots Coalition, as part of their involvement in the extensive California Public Utilities Commission investigation of the SOCALGAS operations of the PDR/Venice oil/gas field, have been analyzed by the same gas analyst, Isotech Lab., the City is currently using for the Playa Vista site. The samples have been isotopically analyzed and demonstrate oil field gas migration to the surface in the Venice and Marina del Rey and Centinela Creek areas. The gas fingerprint of Marina samples match the gas fingerprints of samples that are from the Playa Vista site. (exhibits 15 )

These migrating gases present a danger that is immediate to local residents living over and adjacent to the migrating gases but also to future residents of the Playa Vista site.

Official documents of SOCALGAS, cite leaking well bores in the Playa del Rey/Venice oil/gas field. (EXHIBIT 2 Response Brief CPUC Investigation)

SOCALGAS documents reveal their knowledge that the gas leaking up into Playa Vista contains helium, which has been a signature for SOCALGAS gas. (exhibit 16-June letter helium)

SOCALGAS documents reveal multiple leakage problems and H2S control problems. (exhibit 17)

CPUC documents of SOCALGAS reveal SOCALGAS asking for financial compensation for gas lost through gas migrational losses, well leakage losses and surface leakage losses. (exhibit 18)

The SOCALGAS- Jacob's Engineering Report reveals problems with equipment failures etc.

#### CLA QUESTION #2

Is the extent of the methane contamination fully defined and can it be mitigated?

CLA RESPONSE: Methane is detected at varying concentrations in the soil gas samples collected throughout the Playa Vista Development Project site, with the highest concentrations located in the western portion of the site. The numerous studies of methane concentrations at the Playa Vista Development Project site has yielded a data set that is more than adequate for the

assessment of potential methane hazards and for the design of appropriate mitigation measures. Section 2 of the Report lists all mitigation requirements and methane concentration categories. These mitigations are summarized in the Report Conclusion section above. The recommended mitigation measures are adequate for the Playa Vista Development site.

The City cites Kleinfelder as indicating that methane mitigations: (1) consistent with specification provided by the LADBS in the Los Angeles Building Code and in Memorandum of General Distribution No. 92.

– The Code for Los Angeles MGD No. 92 is in a state of change due its lack of ability to adequately protect the public. It was based upon an incorrect ‘swamp gas’ theory after the 1985 Fairfax explosion and fires. The LA Building & Safety Commission has since asked for its update as a matter of urgency. For Kleinfelder to indicate this consistency—MGD No. 92 with Playa Capital’s adherence to this code, means compliance with something that is inappropriate for maintaining safety at the site.

One example of MGD No. 92 is its vent system which states the risers shall be made of cast iron. Due to high sulfides and H<sub>2</sub>S in the soils at Belmont the iron was rejected due to its inability to withstand the expected corrosion. Playa Vista has a high water table that is highly corrosive due to the high sulfide content as noted in the EIR but, also the Playa Vista site has H<sub>2</sub>S problems that have not been evaluated properly and H<sub>2</sub>S is highly corrosive. The City of Los Angeles has allowed the use of cast iron vent risers at Playa Vista. With such high corrosivity at the Playa Vista site, what are the seismic and liquefaction ramifications for concrete pilings that are reinforced with metal, considering both are subject to losing their integrity for structural support due to the corrosivity. (The H<sub>2</sub>S at the site has not been properly evaluated and the soils engineer for the City of Los Angeles was not shown any of the Archaeological or Boring Log data or LARWQCB data which demonstrates high levels of H<sub>2</sub>S as existing at the Playa Vista site. We provided this data for viewing by the soils engineer, A. Spikowski, during which time Mr. Spikowski stated he had been unaware of the documentation.)

Kleinfelder discusses several oil well abandonments within the Playa Vista surface boundaries, that are; 2) “consistent with the Division of Oil and Gas recommendations for oil well replugging and abandonment”

Kleinfelder completely leaves out the subject of the over 2-300 old wells throughout the region that have the ability to leak gas through the shallow sands and the 50’ Gravel, into the Playa Vista area. Meinfelder is only addressing several old wells that are currently undergoing reabandonment. The DOG also has stated (BAKER) that oil wells abandoned to current standards will eventually leak and that the DOG does not recommend building over abandoned wells. Kleinfelder does not broach the subject that the Playa del Rey/Venice oil field, and consequently all the hundreds of old well bores, are under extremely high pressures, ranging form 1400 to 2400 psi. due to the gas reservoir operations and reflooding, causing dangerous, documented oil field repressurization, that has been allowed to take place. The DOGGR has been non-responsive to this issue. The current standard for well abandonment was never designed to protect wells from the high pressures that are a part of the Playa del Rey/Venice

oil/gas field and they were not designed to withstand earthquakes, liquefaction or subsidence. The current well abandonment procedures were designed for truly depleted oil fields that were not being utilized for highly pressurized operations.

Kleinfelder indicates that the mitigation systems are; 3) consistent with the recommendations of Sepich and Associates 1999 report, would be considered adequate to protect the health and safety of the future residential and commercial occupants of the proposed Playa Vista Development Project. Kleinfelder further indicates that these mitigation measures have been effective in a variety of residential and commercial environments in Southern California, and are adequate for the Playa Vista Development site.

There is no evidence to support that Kleinfelder has technical knowledge with which to make the comment that Sepich's mitigation systems are adequate to protect health and safety. They do not address any seismic, liquefaction or subsidence related problems and those problem's effects upon a mitigation system. The Playa Vista site is a geotechnically unique site that has a multiplicity of problems. There is no model, that has the multiplicity of geotechnical problems that are part of the Playa Vista site, that can be looked to for comparison. Therefore, even though gas mitigation techniques have been used elsewhere, the sites are abundantly different and Kleinfelder cannot offer any substantiation that demonstrates the gas mitigation systems elsewhere are actually performing adequately to protect the public and the environment. We can cite multiple problems of gas mitigation failures; LAUSD school sites, Cedar-Sinai hospital parking areas, the Wilshire Courtyard Building, etc. Direct evidence, from companies attempting to correct such failures, is available. Geologists\* working with monitoring devices in the Long Beach area, have stated that the monitors aboard the oil derricks, often fail due to moisture contamination. Site conditions of moisture, the high water table inherent to the Playa Vista site, have not been considered as to how they will affect the function of the necessary gas monitoring systems. (Information regarding problem sites and persons knowledgeable regarding those sites are available upon request.)

The company, Sepich and Associates was rejected for its approach to gas mitigation at the Belmont Learning Complex—LAUSD. Sepich's techniques were considered inadequate and not able to demonstrate that they could perform safely throughout the lifetime of the Project. (exhibits from LAUSD 19)

Sepich has no oil field expertise. His methodology was designed to fulfill the old LA Methane Code which has now been deemed inadequate. Design materials that Sepich has utilized in the past are the design materials, ie. [*sic*] Liquid Boot etc. that have demonstrated their inability to seal off gas, even after repeated applications. Liquid Boot has a 2-year warranty. We do not believe that John Sepich has the qualifications nor expertise with which to be designing such critical safety measures for the public. The City has been advised by other consultants that Sepich's systems, which are experimental and untried or tested, will not be likely to work safely.

“As far as all the discussion regarding biogenic and thermogenic, that really is not very important when we design a mitigation system underneath the building regardless of what you might have

heard.” John Sepich—Methane Specialists 6/7/00 LA City Budget & Finance Com. Hearing Transcript.

“ Now let’s talk about the relative amount of gas at various locations. If you’ve ever been out to the Labrea [*sic*] tar pits, I can tell you that that is unquestionably the most methane seeps anyplace in the City.” John Sepich—Methane Specialists 6/7/00 LA City Budget & Finance Com. Hearing transcript.

These statements are in direct conflict with statements made by Exploration Tech. Inc and GeoScience Analytical, a City consultant and Methane Mitigation Installation company. The statement is also in conflict with statements made by petroleum engineers and gas migration experts.

“Seismic hazard assessment and mitigation is a rapidly evolving field and it is recognized that additional approaches and methods will be developed. If other methods are used, they should be Justified with appropriate data and documentation.” SP 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California 1997.

METHANE SPECIALISTS RE: PLAYA VISTA METHANE AND GROUNDWATER, March 25, 1999, Sepich includes on page I

1. ... 3rd Paragraph.....”;or if there is a basement the lowest slab must be twenty feet or more above groundwater for exemption by the city; or if less than 20 feet above groundwater the soils/geotechnical engineer or another qualified consultant must provide a report that the groundwater will not rise to the elevation of the methane control system under the slab.” Sepich

We asked for and have not received this report, we do not believe that it exists.

“On sites with methane soil gas potential, it is problematic to design a ‘boat’ or hydrostatic building because the methane vent piping under the building must be above groundwater. Otherwise it will not vent methane properly. The dewatering system is intended then not only for building structural protection and damp protection, but to prevent the methane vent system from being submerged.” Sepich

This is of concern to us. Through Public Record Request Act requests we have asked for reports or data on the dewatering systems of the site, especially because the EIR states that there should be no long term dewatering. We have not been given any data, other than seeing blueprints of the piping and trenches, to determine if adequate dewatering has been accomplished. Subsidence is also a concern. However, the inundation by water of any gas mitigation system, even short term periodic inundation would tend to clog the pipes with not only water but also dissolved solids that will build up and clog the system. A gas mitigation system failure, due to clogging, occurred at a Los Angeles Unified School located adjacent to a land fill. (Belmont Learning Complex Hearings). We have asked David Hsu of LABDS about the 20’ above groundwater caveat stated above, he has not responded. The dewatering is not a part of the Sepich methane system but appears to be noted here as a need for the performance of a gas mitigation system.

DISCUSSION OF L.A. METHANE REQUIREMENTS by Sepich is in the LABDS records of Mr. Hsu.

From what we have learned from various consultants, the dewatering plans for the Visitor Center (which has none) and the Fountain Park Apts. vary due to problems encountered with the high water table of the site and the added burden of the rainy season which can drastically alter the water table within hours. Therefore, there is nothing to show that the groundwater can be kept below, especially 20' below, the lowest slab.

Sepich's creation of the 3 tiered system approach for gas mitigation techniques, does not account for potential ebb and flux of the migrating gas during seasonal water table changes, or seismic activity which could alter gas pathways or volumes. We believe, as do other City consultants, to simply put down a probe on a given day and then decide how to mitigate is folly.

ETI-

"The deeper source (thermogenic) means there's more volume, more pressure, more potential and more danger as regard to safety, particularly when you're in a country where there're [*sic*] earthquakes. Because earthquakes can change the rate of gas flux. From what you map today, tomorrow could be an order of magnitude greater." Victor Jones-Exploration Technologies—transcript 6/7/00 LA City Budget & Finance Committee Hearing

"Shallow biogenic gas only exists where it's generated and that means there's no big reservoir with pressure. If, however, these seeps are related to the Pico sands, it means they have enough pressure to literally throw five million cubic feet a day into the air if they're opened up. So the potential is much greater." V. Jones-ETI 6/7/00 LA City Budget & Finance Com.

"Variations in soil gas concentration levels from site to site and over time are not uncommon given the many factors that influence methane dispersion (ie. Differences in location—specific soil characteristics, vegetation and ground cover characteristics, changes in groundwater levels and distribution, etc.)" Camp Dresser & McKee 1998 pg. 2-7 GAS4. WPD.

"It is the experience of the Department that methane gas can be highly migratory and transient. Therefore, limiting mitigation measures to the area of high gas concentrations observed during the field investigation does not appear acceptable at this time." Jan. 19, 1999-METHANE CTRL FILE—7 LA BUILDING & SAFETY DEPT.

The City acknowledges that gas can be highly migratory and transient, yet does not acknowledge this when it accepts the the [*sic*] 3-tiered approach which allows for a probe to be put down, on a given day, and then allows the mitigation approach to be decided upon based on that probe's findings.

Playa Vista is a liquefaction area with a high water table. It is the largest oil field gas seep in the world according to ETI subcontractors. The SOCALGAS storage operations and its high pressures being exerted upon hundreds of old leaky wells is not taken into consideration by Kleinfelder. Furthermore, the City of Los Angeles has ignored its own Codes and allowed

homes to be built over old wells with no mitigation whatsoever. In recent hearings, we brought a monitor to a City Council Hearing which displayed a currently leaking well bore. The City has done nothing to remedy the situation. We have reason to know, that the DOGGR also is aware of the well bore leakage and yet the DOGGR are non-responsive to the conditions. The well bore is adjacent to multimillion dollar homes and no one from the City is paying any attention to these dangers. The well bore noted above is leaking through water and is self-evident. How many near-by wells are similarly leaking through dry soil and are thus not self-evident. Neither the City nor DOGGR have been responsive to these concerns.

**THERE HAS BEEN A COMPLETE DISENGAGE WITH THE CITY OF LOS ANGELES AND THE CONCERNS OF ITS CITIZENS.**

Camp Dresser & McKee Inc. (CDM)

“CDM implemented a pilot program for the subsurface methane venting system. More than 70 temporary vent wells were installed at the site to detect the feasibility and effectiveness of venting subsurface accumulations of methane in Level 111 mitigation areas. The program illustrated that subsurface methane can be vented. A permanent subsurface venting system is currently in progressive design that will establish criteria for determining the exact number, appropriate location, and engineering design of the subsurface wells (LADBS, Feb. 28, 2001 (Appendix B)).” WE have made repeated Public Record Requests for information pertaining to these experimental vent wells for close to a year. Not only have we still not been allowed to see any data, but according to LADBS staff, the CLA Office hasn’t either. According to staff, when the CLA office asked for information on this, they were told by staff that there were no actual reports, only scattered pieces of information that were not available. We continue to Public Record Request data on the experimental vent wells.

To state that the program illustrates that the subsurface methane can be vented, says absolutely nothing. The ground currently demonstrates that it is venting the gases. Furthermore, according to consultants, including ETI, it has been corroborated that the Vent wells have clogged, at least 50% of the wells, with silt and that the outside casings of the wells are acting as gas conduits to the surface. Furthermore, according to City consultants, there has been a valve placed on the vent wells that will not allow gas to vent until pressures reach above 20 psi. Therefore, it appears the vent wells are functionless. In addition, no study has evaluated the gases that could come from a vent, no participation of the Air Quality Management District has been invited for participation. There are no scrubbers to decontaminate the gases that may off-gas.

Furthermore, the City documents reveal that both ETI and LADBS stated they felt it was unsafe to continue development until they had a FUNCTIONING mitigation system for the 50’ Aquifer. **THERE IS STILL NO FUNCTIONING SYSTEM, DEVELOPMENT CONTINUES UNABATED. THERE ARE NO 50’ GRAVEL VENT WELLS IN THE FOUNTAIN PARK, VISITOR CENTER AREA, WHICH IS CURRENTLY UNDER CONSTRUCTION. THE VISITOR CENTER IS COMPLETED AND IS ALLOWING VISITORS ONSITE.** (Page 13-14 of the City Investigation of Potential Issues of Concern For Community Facilities District No. 4 Playa Vista Development Project)

Prior to the participation of ETI's 4' probes for methane soil gas analysis, analysis performed by Camp Dresser & McKee was found to be flawed and unreliable by ETI.

"It needs to be done to a level of, a detection level that's lower than what had been used in the past because that wasn't adequate for seeing some of the heavier hydrocarbons that are very important to the interpretation." Jones 6/7/00 LA City Budget & Finance Committee.

The 4' probe method of detection is primarily used as a tool for preliminary study of an area for gas detection. Once gas has been detected through this preliminary method, further studies are needed. Deep, fixed probes, need to be utilized in order to establish gas migrational pathways and flux rates over a period of time that will account for seasonal environmental changes.

#### DENNIS COLEMAN PAPERS

No hydrological studies have been performed to analyze the tidal effects upon the gas movement.

The '93-5 EIR-Hargis & Assoc. report demonstrates that the entire Playa Vista site is influenced by the tidal action movement due, in part, to the Ballona Creek Channel which parallels the Projects. It is demonstrated in the Hargis & Assoc. Report that the Ballona Creek also acts as a drainage system for the entire site.

Considering there is no agreed upon source nor any evaluation to demonstrate the gas pathways it appears the current proposed methodology for mitigation is seriously flawed.

Permanent dewatering is necessary to keep any subsurface gas venting pipes out of the water. The methods for the dewatering vary under each building under construction because LADBS has realized some methods, already in place, may not be working as hoped and have since altered plans for the next building under construction. LABDS is non-responsive to our queries regarding this. The original EIR stated that no long term dewatering was to take place.

#### DEPT. OF CONSERVATION—MINES & GEOLOGY SPECIAL PUBLICATION 117—Pg. 4 SUBSURFACE WATER:

2. "Periodic or seasonal influx of surface water to subsurface water will not be detected unless subsurface water observations are conducted over extended time periods."

The seasonal ebb and flow of tidal influence over the entire Playa Vista site, according to the EIR, is generated to a great degree by the Ballona Channel which is a drainage basin for the entire site. None of this tidal action or influence has been characterized for its impact upon gas flux or pathway changes or movements.

#### DEPT. OF CONSERVATION- MINES & GEOLOGY SPECIAL PUBLICATION 117—Pg. 43 HAZARDS TO LIFELINES:



“...liquefaction also poses problems for streets and lifelines—problems that may, in turn, jeopardize lives and property. For example, liquefaction locally caused natural gas pipelines to break and catch fire during the Northridge earthquake, and liquefaction—caused water line breakage greatly.”

There has been no assessment to characterize the impacts of liquefaction or water withdrawal-subsidence, upon the numerous highly pressurized, toxic and potentially explosive gas pipelines of the Playa Vista site. There has been no assessment to characterize the impacts of liquefaction or subsidence upon toxic and highly corrosive oil field brine effluent pipelines at the Playa Vista site.

The LA Fire Dept. when asked what, if any, measures are in place to address human casualties, if the site were to have an explosion and subsequent fires with potential emissions of high levels of H<sub>2</sub>S; responded, ‘none.’ We asked the City, where will the high density populations of people be relocated if an emergency condition arises? The City had no answer.

Furthermore, no evaluation has been performed to determine what-liquefaction and subsidence impacts may occur upon the over 200 old leaky wells of the Playa del Rey/Venice oil/gas field that are even now acting as conduits for oil field gas migration. Currently known, leaking wells have not been addressed by the City. The effects of seismic activity and/or subsidence due to fluid withdrawal has not been addressed as part of a risk assessment. Over 200 wells of the PDR/Venice oil/gas field are an integral part of the Playa Vista site (LA City Planning Document 15808) and the ability of the highly permeable 50’ Gravel, the old LA Riverbed, to act as a ‘SUPERCARRIER’ of oil field gases has not been addressed in any risk assessment.

Prior to the past year and 6 months, Playa Capital stated that all the gas emanating from the site was simply low volumes of swamp gas that didn’t need to be mitigated. (Exhibit 20)

Since the involvement of ETI it has been established that the gas is oil field gas. The difference creates a more difficult situation to make safe.

“Shallow biogenic gas only exist where it’s generated and that means there’s no big reservoir with pressure. If, however, these seeps are related to the Pico sands, it means they have enough pressure to literally throw five million cubic feet a day into the air if they’re opened up. So the potential is much greater.” ETI, Jones 6/7/00 Budget & Finance Committee Hearing Transcript.

It has been established that the oil field gases are migrating up from depth, which includes the Pico sands. The Division of Oil & Gas does not state that the origin is- in the Pico sands and states so in the CLA Report. However, it is agreed the gas is oil field gas and it is coming from depth which does include the Pico sands. Scientific documentation supports the gas as originating from the oil formation itself, which is deeper.

The mitigation measures are experimental. Methods used should be justified with appropriate data and documentation. (Special Publication 117 Dept. Conservation)

WE have, through our Public Record Requests, been provided no information or supporting data to demonstrate that the mitigation systems will be able to perform safely over the lifetime of the Project.

“Seismic hazard assessment and mitigation is a rapidly evolving field and it is recognized that additional approaches and methods will be developed. If other methods are used, they should be justified with appropriate data and documentation.” Pg. 2 OBJECTIVES—Publication 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California.

ETI stated, “If the pump and treat or equivalent methane mitigation system is not effective or if Playa Capital does not install an appropriate mitigation system in the 50’- Gravel. ETI believes that the development of the area should not proceed. Without the. proper mitigation of the methane present, a dangerous situation exists at the site. No further development should be allowed on this site until these mitigation issues are resolved.” ETI letter May 31, 2000, to Hsu, LABDS (Exhibit 21)

LABDS concurred, “Further, LABDS agrees with ETI’s position the Building in Level III areas is contingent upon a functional subsurface venting system...” Jan 31, 2001, Hsu letter to Playa Capital—Nelson regarding the 50’ Gravel mitigation. (Exhibit 22)

General Manager of LABDS Andrew Adelman states in the CLA Report that the mitigation for the 50’ aquifer is in a “progressive design stage.” (Exhibit 23)

**MITIGATION OF THE 50’ GRAVEL HAS NOT BEEN DEMONSTRATED.** ETI staff corroborated the fact that at least 50% of the experimental test vent wells were clogging with silt. According to LABDS staff, even the CLA Office was not able to receive any written information on the testing of the experimental vent wells. The City has not, after months of repeated Public Record Requests for the Vent well information, released any information to the public.

There are no 50’ Gravel vent wells in the Fountain Park Apt. and Visitor Center area. The Visitor Center has been allowed by LABDS to receive the invited public. The City continues to allow development to proceed without fulfilling its own requirements for safety. The CLA Office had no data to comment on the critical mitigation of the 50’ Gravel. Jones of ETI stated in the public hearing that he had no faith in the gas membranes being able to work in a seismic environment and was therefore relying upon the mitigation of the 50’ Gravel. This area-wide mitigation idea has now been narrowed to mitigating the 50’ Gravel only underneath each building due to the inability to mitigate the Riverbed. It was decided that the migrating gases are continually and rapidly replenishing the area and that remediating the aquifer was not possible.

The City has already caused exacerbated gas migration up the thousands of pilings and gravel column being utilized to stabilize the liquefaction concerns. ETI conducted gas surveys both prior and after the installation of the pilings and column. It was discovered that gas was migrating up these new pathways in larger quantities. (Exhibits 24)

Prior to the second testing, a Playa Capital consultant, Kul Bhushan, President of Group Delta, determined that the pilings and column would not act as conduits. Apparently, he was wrong. Mr. Bhushan also states in the CLA Report (under subsidence) that the water table under the Fountain Park Apts. is lower than the gas mitigation system. Please view our videotape of the area, the water of the area is at the surface during the rainy season and floods the area as can be seen in the section of the video that shows gas bubbling to the surface in the Fountain Park Apt. area.

Another Playa Capital (Lathim [*sic*] & Watkins law firm) consultant Ian Kaplan later put forth a report stating that the exacerbated gas movement was only temporary. This conjecture on Kaplan's part we find highly questionable and dubious as we can find no data to support such a claim. Kaplan's earlier report on gas migration in Centinela Creek done for SOCALGAS, is included in the CLA Report. Kaplan's report establishes his view that the migrating gas in the Creek is primarily biogenic in nature. Yet, it has been established by the City's gas analyst expert, Coleman, that the gas is oil field gas generated. The gas samples gathered throughout the Playa Vista site have also been determined to be thermogenic/oil field generated. Coleman has also characterized a further gas sample in the Marina del Rey area, which matches Playa Vista gas, as being oil field generated and not biogenic or 'swamp gas.'

Mr. Kaplan was also involved with the 1985 Fairfax incident in Los Angeles where gas migrating to the surface was determined by the LA City Task Force—Majority Report, to be 'swamp gas.' The incorrect 'swamp gas' theory was what gave Los Angeles its poor Methane Mitigation Code. A past Ca. State Geologist was apart of the unpublished 'Minority Report' on the Fairfax incident and he found the gas that caused the explosion and subsequent fires, to be thermogenic, or oil field gas generated. Coleman, also was a part of the later determination that the Fairfax gas was oil field generated. Endres Ph.D, the lead investigator, for the injured people, revealed not only was the gas oil field generated but was actually oilfield gas migrating away from a deteriorated oil well casing, Metropolitan #5.

#### GAS MEMBRANES:

The Playa Vista site is designated by the State Dept. of Conservation as a potential liquefaction and landslide area and is portrayed as such on the State Seismic Hazard Map.

The potential for liquefaction and differential settlement to occur is a critical issue with regard to any oil field gas mitigation systems. Landfills, as we have been informed by GeoScience Analytical as well as scientists that work with geomembranes, are not placed in liquefaction settings. This is, in part, because the membranes cannot be relied upon to maintain their integrity in a liquefaction setting during seismic activity. Therefore, why would one expect the membranes to hold up in a liquefaction setting, as is the Playa Vista site, and maintain 100% safety over the lifetime of the Project. It appears to be a recipe for disaster.

“In the event of a severe earthquake on the San Andreas Fault Zone or a moderate earthquake on the nearby capable faults, settlements due to liquefaction in the range of one to two inches are expected in Area D.18 LeRoy Crandall and Associates, op. Cit., Jan. 3, 1991.” Even this expected settlement would be potentially devastating upon the integrity of any membrane.

HDPE—GeoScience Analytical, a methane mitigation company, has been utilized by LADBS for consulting purposes regarding the mitigation systems for Playa Vista and elsewhere. GeoScience Analytical has given documentation and warnings to LADBS of an 85% failure rate in HDPE membranes that have been tested in settings such as Playa Vista.

The City is currently utilizing a material called Para Seal, which according to GeoScience Analytical has never been used as a gas sealant. It functions as a water retainer. The clay backing, bentonite which helps to seal the material together in a water environment, had to be ground off at the Playa Vista site in the attempt to seal the material along seam areas. According to a LADBS site inspector, in a verbal communication with us, stated that approximately 60% of the seams were tested with a vacuum box. LADBS Code on the Project calls for all seams to be tested.

Furthermore, according to GeoScience Analytical, the vacuum box will only reveal large leaks, not smaller or pin hole size leaks that are all that is necessary to create gas seepage hazards.

Designing with GeoSynthetics 4th Edition by Koerner, is the world's foremost research institute, exclusively studying geosynthetics. Koerner describes the vacuum box, as a testing tool, to be virtually worthless. (Exhibit 25)

LIQUID BOOT—Has, according to its manufacturer, a 2 year warranty; it ruptures at 3-5 psi. The psi of the site is 20 psi according to GeoScience Analytical, a past employee of Playa Capital and a consultant to LADBS.

Liquid Boot was utilized by the LA City Dept. of Water & Power for vault boxes at Playa Vista. The Liquid Boot failed to seal out water and its use was discontinued. (EXHIBIT 26)

Liquid Boot was permitted for use by LADBS and is under the Visitor Center, there are no known documents to show that the Liquid Boot was tested, which would match its past use throughout Los Angeles where it has also never been field tested.

Today, Orange County is doing some of the first 'smoke tests' on the product, of which our video documentary is one location. The Liquid Boot manufacturer states that there has never been a documented failure. This is false, many sites across Los Angeles have failed that have used Liquid Boot. GeoScience Analytical has utilized the product and has found that it leaks.

Our video documentation of a smoke test of Liquid Boot's application at a housing site is available. (Exhibit 27—VIDEO) The video demonstrates that the spray on membrane leaks after repeated applications, all leaks are not seen and are consequently left unfixed. The process of laying a gauze material down prior to application of the membrane involves nailing it to the ground to prevent movement and consequently the nails create holes in the membrane from below, as also documented on the video.

DESIGNING WITH GEOSYNTHETICS, 4th Edition by Robert M. Koerner

“Dr. Robert M. Koerner is the H.L. Bowman Professor of Civil Engineering at Drexel University in Philadelphia, Pennsylvania USA. He founded the Geosynthetic Research Institute in 1986 and has led its growth and significance to the point where it is the foremost research and development institute in the world focusing completely on geosynthetics.”

Example:

“With so many potential problems, \* it is natural that emphasis on high-quality field seams and on subsequent seam inspection is commonly referred to in the literature. This need grows progressively more important depending upon the implications of the contained material (usually liquid) escaping.”....

“Of equal importance to the type of seam are seam testing methods. While destructive tests are invariably required, they are self-defeating at the outset. The worst-looking locations of a lined facility is at every location where a sample has been cutout for testing, patched, retested, and sometimes patched again. When samples must be taken by or distributed to the regulatory agency, the owner, the contractor, the designer, and the CQA organization, the situation can become ludicrous. It begs for a nondestructive test that assesses both quality and continuity. At this point in time, the vacuum box method is heavily relied upon. In the author’s [sic] opinion, such reliance is foolish. One hundred percent seam inspection by vacuum box testing simply cannot be done. Usually those locations where the vacuum box cannot be used are where problems arise, namely, on slopes, in corners, at sumps and at penetrations. In this light, ultrasonic methods-particularly the shadow method-show some potential. A major thrust to investigate its capabilities and limitations is warranted, yet such an investigation must be in addition to the constant search for test and seaming methods that are ever more accurate and efficient.”

John Sepich of Methane Specialists, the company hired to design the mitigation systems is a civil engineer not a structural engineer. There has been no assessment, qualified or otherwise of how the structures will act in concert with the fragile gas sealant membranes during settlement or seismic activity.

DEPT. OF CONSERVATION, MINES & GEOLOGY SPECIAL PUBLICATION 117: Pg. 48  
CONFLICT OF INTEREST

It appears that John Sepich is a paid lobbyist [sic] for Playa Capital as well as in the employ of Playa Capital for its methane mitigation. We are unable to find any qualified oversight of his methane mitigation techniques. Therefore, it would appear that he is responsible for his own critique which is, according to Special Publication 117, a conflict. (Exhibit 28)

Group Delta designed the structures for a liquefaction setting. Mitigation of the gas was left for others to figure out. (Exhibit 29 )

Bhushan, President of Group Delta and Playa Vista (Lathim [sic] & Watkins) consultant, has a brief paper in the CLA Report discussing liquefaction aspects upon the structures and their ability to keep standing however, once again the issue has been begged. The question is, how

will the membrane and the mitigation systems hold up to the shifting of the structure, not will the building be left standing. It has just recently come to our attention that the soils engineer of LABDS was not given any of the information that we either gave over to David Hsu or brought to his attention from his own files regarding H<sub>2</sub>S. This is quite disconcerting as the highly corrosive aspects of H<sub>2</sub>S were not included nor addressed for its effects upon long term structural integrity. It is well known that excavation will outgas and remove the immediate presence of H<sub>2</sub>S yet according to most, experts that we have contacted, the H<sub>2</sub>S given time will reformulate. The high water table of Playa Vista and the high sulfate content of its soils, along with its high concentrations of Methane create a H<sub>2</sub>S generation environment. For the LABDS soils engineer, a person who we have specifically asked if he believes he is adhering to the Seismic Safety Hazard Guidelines, to not be given this information is very disconcerting. (exhibits—include more information regarding H<sub>2</sub>S that was excluded from the CLA Report—Boring Logs, Army Corps of Engineers data, Archaeology data from the Phase 1 area)

#### FURTHER REASONS FOR CONCERN OF MEMBRANE FAILURE

SIMILAR CONSTRUCTION taking place in the Marina area, which is within the liquefaction hazards of the Seismic Hazard Map, as is the Playa Vista site, states:

“Because seismically induced liquefaction settlement of the ground surface will most likely result in settlement beneath the lowest basement level floor slab, we recommend that the lower basement level floor slab be structurally supported. In considering placement of structural reinforcing in the floor slab, it should be anticipated that hydrostatic pressures will result uplift forces; however liquefaction induced settlements will most likely result in gaps beneath the floor slab and subgrade. In addition, differential settlements between the pile-supported structure and the adjacent minor structures and utilities can be expected. Accordingly, we recommend that flexible connections be used where utilities enter the buildings to allow for differential movement and that proposed minor structures (planters, swimming pools, etc.) be structurally separate from the proposed buildings or structurally supported by the main structure.” DEIR for County Project No. 98-134 Manna del Rey Apartment Community, prepared by Impact Sciences Inc. May 2000.

CLA QUESTION #3: Is there significant subsidence on the site currently, or will future methane mitigation measures cause subsidence issues which may undermine the structural integrity of the future development?

CLA ANSWER: Design measures are adequate to address the minimal level of subsidence and uplift observed in the area. There is no evidence that proposed methane mitigation measures would result in increased potential for subsidence in the area.

The question and answer are both specious at best.

Significant subsidence has been demonstrated in the area. (Exhibit 4) The area has been determined by USGS to be a subsidence prone area. (Exhibit 4)

While dewatering for the mitigation systems and its possible subsidence effect is not to be ignored, the question is how will any subsidence effect the integrity of the gas membranes and the integrity of the over 200 old well casings throughout the region. Gas leakage is the issue.

Subsidence has been an unaddressed issue for the Playa Vista site. From approximately two years ago Playa Capital consultants utilized a telephone conversation with Art Kurimoto—LA Public Works (unbeknownst to Art) as documentation that no subsidence was taking place at Playa Vista. Mr. Kurimoto had been involved in a transverse survey of roadways. We let Art know that his phone conversation was being used as documentation by Playa Capital that no subsidence was taking place in the area. Mr. Kurimoto subsequently let it be verbally known to LADBS that he neither commented on or participated in a ‘subsidence study.’ A year later, Playa Capital, again used Art’s same old phone conversation, only this time they put it in writing inside a[n] SEIR for a proposed catch basin area in area D (Phase 1). (Exhibit 30) Again, we brought this to Art’s attention and this time he responded; in writing, to LADBS and refuted the use of his work and name. In the letter, Art expresses that the street bench marks indicate street movement (of those studied) and not ‘marsh’ movement. Playa Capital then took street benchmarks to do their own assessment that was construed by them to be a ‘Subsidence’ study. WE believe the street benchmark study done by Playa Capital is, not a Subsidence study of the AREA. However, Endres PhD. utilized the same benchmark figures from Public Works that were utilized by Playa Capital consultants and had a different evaluation of what the street benchmarks indicated. David Hsu of LABDS had asked Endres for his evaluation and stated he was having it reviewed. (exhibit 31)

There is no indication in the CLA Report that Endres’ Review was ever evaluated or utilized. There has been no response from anyone in the City regarding Endres’ review. The review still needs to be addressed. It was one of our questions before the LADBS Commission hearing that received no response.

#### **WE BELIEVE THE SUBSIDENCE ISSUE HAS NOT BEEN LEGITIMATELY ADDRESSED.**

Furthermore, a new subsidence issue has come to our attention that has never been addressed in any document, including the ‘93-5 EIR. There is a toxic plume that underlies much of the Phase 1 area of Playa Vista, a legacy of commercial activities of Howard Hughes and McDonald Douglas. The EIR states that this area will be remediated through a pump & treat method and that the water from the remediation will be the PRIMARY water source for a ‘freshwater marsh,’ an area that Playa Capital needs as a catch basin for its Project. Theoretically, it is supposed to be a viable habitat area which is why a year round source of clean water is necessary to help dilute or keep clean other run-off, seasonal or other. However, there has never been a subsidence study done by the City to account for all the pumping of water, which is supposed to last 10-20 years. No agency has done any subsidence study. Today, the pump & treat has been stopped as different methods of remediating the toxic plume are tested. However, there has been no study to show that the ‘marsh’ can be a viable habitat without its PRIMARY WATER SOURCE, the pump & treat. Yet, amidst this lack of evaluation, the ‘marsh’ area is being bull-dozed under construction. This is a critical unevaluated issue.

#### **CLA QUESTION #4**

Does the postulated Lincoln Boulevard fault exist, and if so does it present an unacceptable risk, either from seismic activity which cannot be accommodated under existing building codes or a rapid release of methane from the adjacent storage facility?

#### CLA ANSWER

The geologic and geophysical data do not support the existence of the postulated Lincoln Boulevard fault. In addition, as indicated above, methane gas at the Playa Vista Development Project site does not come from the Southern California Gas Company Playa del Rey Gas Storage Field. Therefore, the potential for large volumes of methane gas to escape from the Southern California Gas Company Playa del Rey Gas Storage Field in the event of an earthquake is unsupported by the evidence.

The postulated Lincoln Blvd. Fault has become a 'straw man' of Playa Capital and the City of Los Angeles. What is still at issue is the already extraordinary high volumes of oil field gas oozing to the surface at Playa Vista. The installation of pilings and gravel that have been shown to have increased the volume of surfacing gas is still an unresolved issue. The continued placement of more pilings is an unresolved issue. The experimental vents, which are sealed by a valve until pressures reach above 20 psi, are acting as conduits along the outside casing. This needs to be resolved.

Oct. 20, 2000, ETI letter to LABDS Hsu: "Dr. Kaplan's report does not include any maps and does not consider the actual spatial distribution of either the initial October/November 1999, nor the August 2000 data sets. A careful and considered evaluation of the two independent data sets clearly shows that the installation of the piles has increased the concentrations of the soil gas values at the four foot depth within an area that obviously conforms to the location of the piles."

Prior to any discussion of any faulting at the site, ETI stated in a July 23, 1999, letter to David Hsu (LABDS), "...the fact that the Playa Vista site in the City of Los Angeles will be subjected to significant earthquakes in the future that can alter both the subsurface methane concentrations migrating from subsurface sources and degrade any methane mitigation system. As you know, the problem is far from trivial."

This statement is demonstrative [*sic*] of our concerns regarding the Playa Vista site and its offsite ramifications. It appears that there is Playa Capital and LA City consensus [*sic*] that seismic activity can and probably will alter the gas migration pathways and volumes, perhaps significantly so, in the future. Regardless of any Lincoln Blvd. Fault there appears to be the same consensus [*sic*] that, as ETI states in a Jan. 31, 2001, letter to LABDS David Hsu,

"Preliminary interpretation of the geophysical data from seismic profiles supports the premise that the methane gas found east of Lincoln is moving upward within a vertical zone of disrupted strata from beds of the Pico Formation. Offsets in reflections of the seismic profile may be interpreted as zones of disrupted strata, which are likely permeable to gas.... Thus the near-surface gas anomalies appear to be issuing from fractures or other disruptions that directly underlie the methane anomalies as defined by the soil gas surveys."



The City geologist does not then proceed to investigate the potential for large volumes of gas to escape from the subsurface oil field from where the gases are emanating; via all the noted fractures and disrupted strata. Nor does anyone discuss the already supersaturated 50' Gravel, the old LA Riverbed, as a permeable pathway for the oil field gas to migrate in a further exacerbated fashion due to any of the fractures or disrupted strata or as the highway for leaking well bore gas.

ETI letter to LABDS, David Hsu- June 16, 2000:

“There is however, a possibility that the gas measured within Tract 49104 by ETI has migrated to the surface from shallow horizons around the well casings in the gas storage reservoir. On June 12, 2000 we submitted to B&S a workplan designed to evaluate this very real possibility. Attachment 2 of our workplan letter is an actual Southern California Gas Company document written by John Thompson to Jim Montgomery which proves that natural gases very similar to those found on the Playa Vista site are “venting” up the casings of some of their wells.... The DOGGER [*sic*], however, should take a different view. The purpose of well casings is to contain all fluids and gases, preventing cross-migration between different sands and protecting the fresh water aquifers. The admittance of this observation being common and observed over many years means that the interest of the public and the state of California is not being served.” (exhibit 32)

We believe the above stated situation was not only left out of the evaluation process as well as being a violation of Public Resource Codes to which the DOG is responsible but that also the City officials, licensed geologists and engineers have ignored the AMERICAN SOCIETY FOR STANDARD TESTING AND MATERIALS standards.

ASTM 1527-00 regarding Environmental Site Assessments states:

#### Material Threat

A threat which is physically observable or obvious and is reasonably likely to lead to a release that in the opinion of the E.P. which is threatening and might result in impact to public health or the environment.

**THIS ISSUE CONTINUES TO BE IGNORED AND WAS NOT FACTORED INTO THE CLA REPORT.**

ETI 6/7/2000 LA City Budget & Finance Committee Transcript of Hearing;

“We’ve also been concerned because this is earthquake country that if you get 5%—or if you get up to 5% gas, that’s explosive level. We think that since there’s 75% to 89% gas in some of these shallow sands, it’s possible to get nearly 100 % gas in the gravel pack. If you had a leak into an elevator shaft or a pump room or something in the basement of the building with a small volume and you actually had a 100 % methane underneath, I would be very concerned that an earthquake ore [*sic*] even just stress in the earth could cause buildings to shift, foundations to crack, don’t even need an earthquake to do that. And what would happen is you’d have a dangerous situation.”

THESE are issues raised by the City's own consultant that were not addressed in the CLA Report adequately or reasonably. There is no mitigation system as yet for the 50' Gravel area, ETI stated at the recent B & S Commission Hearing that he (Victor Jones) had no faith in the membranes during seismic activity. These are unresolved issues and yet the building continues unabated.

#### CHARNOCK FAULT:

Davis & Namson (Playa Capital/Lathim [*sic*] & Watkin [*sic*] consultants) have stated in the CLA Report the non-existence of the Charnock Fault. Yet, according to the Dept. of Conservation, Mines & Geology—Maps and personnel, the Charnock Fault exists. The direct conflict between Davis & Namson and the Dept. of Conservation is not pointed out in the CLA Report. We find this to be misleading to the public and of concern regarding the lack of intercommunications of a State Agency and the City Report.

#### LINCOLN BLVD. FAULT & ANOMALIES:

The fact that the Dept. of Conservation, Mines & Geology only addressed the "Lincoln Blvd. Fault" and the "2 off-shore anomalies," instead of addressing the Playa Vista site area is disconcerting because the Division of Mines & Geology becomes part of portraying only a portion of a story which is misleading to the public.

Active faults in the Santa Monica bay, noted on Mines & Geology Maps that are just off-shore from the Playa Vista site are not discussed.

According to John Davis, Coalition [*sic*] to Save the Marina, he has had conversations with Mines & Geology staff that state they do not dispute the paper done by a Professor Legg of the Univ. of Long Beach. Legg's paper states that the two anomalies are active faults that trend onshore. If Mines & Geology does not dispute this, then it appears the two fault areas should become part of the Alquist-Priolo Study. There is no mention of this in the Mines & Geology response regarding these 'anomalies.' Please respond to this issue.

Also, in the FINAL CLA REPORT, the 3.3 Quake that occurred in Sept. 2000, which had the Ballona Creek/Centinel Boulevard projected by Cal Tech as its epicenter, was virtually dismissed in the CLA Report regarding its significance. An explanation of where and how the quake occurred is written in the final report but there is no indication of authorship and there is no supportive data for the explanation.

We would like the Dept. of Conservation – Division of Mines & Geology to address the comments, apparently made by personnel of the CLA Office itself.

One last note regarding the Lincoln Fault issue and the City response—the Playa del Rey/Venice oil field area is releasing gases to the surface. While we have documentation that displays that gases are originally emanating from the SOCALGAS reservoir, through leaky well bores that have been feeding the underlying strata for many years; what we have attempted to make clear to

the City, is that the entire Playa del Rey/Venice oil gas field is at issue here, not just the immediate SOCALGAS reservoir portion of the active field. The City Report misleads and creates a diversion of reason in its language that ignores the over-all risks.

The CLA REPORT final statement of this issue, “Therefore, the potential for large volumes of methane gas to escape from the Southern California Gas Company Playa Del Rey Gas Storage Field in the event of an earthquake is unsupported by the evidence.”

This statement, we believe is deliberately misleading and demonstrates a deliberate refusal to become informed regarding data that could have been asked for from SOCALGAS and our own ‘Library’ of data, as well as deliberately excluding our testimony and oral queries regarding the entire oil field hazards. An oil field risk assessment has still not been prudently performed.

- (a) The mixing of native and reservoir gases has not been evaluated or acknowledged.
- (b) Data, showing isotopic fingerprints from the Marina area, that match the Playa Vista gas has not been included in any assessment for the region, in spite of the fact that this is a regional issue.
- (c) The current, ongoing involvement by DTSC is due to its concerns for the regional hazard issue of the oil field gases that are migrating to the surface. The CLA Report excluded DTSC from its study process and does not reasonably or prudently acknowledge the concerns of DTSC.
- (d) The CLA Report does not address or include available data from the ongoing California Public Utilities Commission investigations of the regional potential hazards of the SOCALGAS-PLAYA DEL REY OPERATIONS.
- (e) The CLA Report does not address or include any mention of the ongoing Federal Environmental Protection Agency investigations into the Playa Vista site.

The Report is incomplete and should not be approved.

#### CLA QUESTION #5

Is there BTEX and H<sub>2</sub>S contamination along with the methane which presents a health risk to workers and future residents?

#### CLA ANSWER

Potential health risks associated with BTEX and H<sub>2</sub>S soil gas emissions at the Playa Vista Development Project site, whether associated with methane or soil and groundwater contamination, are below the benchmarks established by the regulatory agencies to indicate insignificant risk, with no further investigation or remediation warranted.

LARWQCB, in coordination with OEHHA, has established a soil and groundwater remediation process which adequately protects human health and the environment, including addressing potential cumulative impacts. The health based remediation strategy established for the Playa

Vista Development Project site is comprehensive in nature and will consider BTEX soil gases in the cumulative assessment completed for the site as remediation activities are completed. The LADBS has established procedures to ensure close coordination between the City and the LARWQCB as site development progresses. Therefore, potential cumulative impacts associated soil and groundwater contamination, including BTEX, will be addressed in a manner that is protective of human health. CLA RESPONSE

We believe it is unlawful for any person(s) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made not misleading. Also, we believe it is unlawful to fail to reveal material facts that were known or which, but for a deliberate refusal to become informed, should have been known.

The ‘Interim Report of Sampling & Analysis of Soil Gas from Unit 49104-03,’ is an example of evaluation that we believe was improperly done. The site area had already undergone massive grading, excavation and surcharging. To sample gas levels in an area with so much disturbance would not provide a true read of gases in the area. It is common knowledge that excavation, grading will out gas BTEX and H<sub>2</sub>S quite effectively. The time of regeneration for the highly volatile chemicals is not established here. Mr. Kaplan and others had input into this analysis, it is highly disturbing that these ‘scientists’ performed evaluations upon soil that was obviously, heavily disturbed. “The importation of soil for surcharging was also a large part of this site.

Currently, there is no modern concrete that can withstand the corrosive effects of H<sub>2</sub>S.

Documents filed with LABDS that are unaccounted for include:

c. GROUP DELTA, Dec. 8, 1998, Project No. L-195 letter to Mr. D. Chernik  
Subject: H<sub>2</sub>S GAS VENTING FROM EXPLORATION BORING, Playa Vista-Marina del Rey  
Los Angeles California (see exhibit)

“The sample and well at that time began to vent off H<sub>2</sub>S and Methane gas. AT 65 ppm readings, and with the Lel readings being over the explosive limit, the boring was terminated and destroyed at 50 feet bgs.

As far as we know, Chris Neal, Driller, THF, Long Nguyen, Engineer, GDC, and David Ferraro, Archeologist, SRI complained of irritations following the exposure. Currently, Mr. Nguyen is still complaining of symptoms possibly related to the aforementioned exposures. Presently, GDC is allowing a physician to examine Mr. Nguyen. We will notify THF and suggest that Mr. Neal be similarly examined. We also suggest that Mr. Ferraro be examined.”

2) COLICH & SONS Feb. 19, 1999 letter to Mr. Pegg—The Moote Group  
RE: Methane & Hydrogen Sulfide Gas; Storm Drain, Tract 49104-01, Phase 01; The Playa Vista Project, Los Angeles, CA (see exhibit)

“As you are aware, Colich & Sons has encountered pockets of contaminated soil containing methane and hydrogen sulfide gas during our trenching for placement of the storm drain.... In

addressing this situation, our first and foremost concern is for the health and safety of our employees and other personnel who could be exposed to this hazard....”

3) DEPT. OF THE ARMY LETTER (Dec. 14, 1998) RE: PLAYA VISTA  
ARCHAEOLOGICAL AND HISTORICAL PROJECT & Settlement on the Lagoon Edge  
Report

Archaeological Monitoring Report, May 1998; Submitted to Playa Capital Company: LLC from  
Statistical Research, Inc. March 1999 (SEE EXHIBIT)

“One common attribute of a wetland is naturally occurring pockets of methane and hydrogen sulfide gases. In many areas of the proposed residential 49104-01 tract map and the freshwater marsh, these gases were found in levels exceeding concentrations developed by the Occupational Safety and Health Act (OSHA) for safe excavation. When concentrations of these gases were encountered that exceeded OSHA standards, core excavation stopped. Of the 38 cores planned for excavation, 4 were only partially dug, due to presence of concentrated methane and/or hydrogen sulfide gas.” Pg. 4

“The project was complicated by three factors... Second, a naturally occurring pocket of methane and hydrogen sulfide gas lies immediately below the cultural deposit at LAN- 2676.”

4) Gabrielino Indian Daily Field Logs (SEE EXHIBITS)

Exhibits display site locations for high gas and H<sub>2</sub>S exposure.

Example of one log—APR 20, 1998—site Playa Vista.

“Here, high levels of H<sub>2</sub>S and carbon monoxide are detected. Safety Officer O’ R advises entire crew to leave area and drilling is suspended in area....”

5) The Playa del Rey/ Venice oil field operated by SOCALGAS is of concern due its  
Connections with the Playa Vista site. SOCALGAS has had continuing problems due to H<sub>2</sub>S  
corrosion as attested to in the following documents not addressed in the CLA Report:  
SOCALGAS interoffice correspondence from D. Zuniga and E.S. Sinclair (EXHIBIT)

“SOCAL 4 has been shut-in since September, 1984, because of producing H<sub>2</sub>S concentration of  
above 2000 ppm in the gas stream.... Recently, all PDR employees who might be required to  
work around H<sub>2</sub>S producing wells and who might be exposed to H<sub>2</sub>S in other areas, were trained  
by Secorp to respond to H<sub>2</sub>S environments....”

6) COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY, March 1993—letter  
to Ms Laurie S. Fronczek from Charles W. Carry P. Martyn Industrial Waste Section RE:  
Approval of Use of UCARCIDE 142 or 114 as a Biocidal Agent

“The Districts have reviewed The GAS Company’s request to use Ucarcide 142 (U-142) or  
Ucarcide 114 (U-114) as a biocidal agent for the treatment of microbiologically influenced  
corrosion in the The [sic] Gas Company’s Playa Del Rey wastewater collection and treatment  
system.” (EXHIBIT)

7) NALCO CHEMICAL COMPANY Feb. 28, 1989 letter to Mr. Norton  
SOCALGAS RE: “Enclosed is information on the biocides that we plan to inject at Playa Del Rey.”

“The best place to inject either biocide will be the Troxel #1 well site located off of Speedway between Topsail and Union Jack (streets) in Marina Del Rey. Reasons for choosing this particular site are:

1. This injection location is the farthest point from the station. We will be able to treat more of the pipeline.... The bacteria is so sick that they cannot reproduce, produce H<sub>2</sub>S and slime.”  
(EXHIBIT)

8) PLAYA VISTA NEW WELLS 1/27/00-3/19/00 Well Installing

Examples below (see full exhibits) These are just some of the notes that appear to demonstrate that there is a serious H<sub>2</sub>S problem that needs to be adequately addressed at the site. The CLA Report does not include this data. We believe it is important to note here, that when we presented this information at a LABDS Commission Hearing, LABDS, Mr. Hsu, had these notes in his possession and that this is part of what Mr. A. Spikowski, the soils engineer for the City of L.A., stated in a recent meeting with him—July 2001—that he had not seen.

While we are concerned with the toxic aspects of H<sub>2</sub>S, the CORROSIVE aspects should be accounted for in LABDS REVIEW AND ARE NOT. Also, the time at which we presented this information to the LADBS Commissioners, was during the time frame that Playa Capital was still claiming that no ‘geyser’ activity had been occurring on their site. Also, Mr. Embree, the toxicologist for Playa Capital, stated at the Hearing, that the 500 ppm in one of the field log notes was a mistake. However, Mr. Embree did not have any data or information in order to back up this claim at the hearing nor did he account for all the other high level readings of H<sub>2</sub>S. Upon speaking to LADBS, after the hearing, we asked Mr. David Hsu if he had been told of the reading as being a false read. His response was no. Clearly, in any review, one must provide the data to show what one is claiming, especially when these are such critical issues. It is important to note, that this same hearing is where a Commissioner stated that many false and misleading statements had been made by Playa Capital in order to obtain permits. It was the same hearing that it was decided the Methane Code was inadequate and in need of immediate updating. (Video of hearing is available, also Playa Capital has the transcript)

9) 2/29/00—11:15 “..methane that is bubbling up through ground near #3 well site. H<sub>2</sub>S Reading 115 ppm—Moved drillers away from auger will wait 1/2 hour. 1530—Still bubbling will let well (augers) sit overnight.”

10) 3/6/00—MMW-803;

11:30 “Top of seal @ 44’ still smelly. 2:30 “Methane vapors visable [*sic*]. 2:45 “Hole is bubbling like a geyser. 2:50 “Standby until safe H<sub>2</sub>S reading 113 ppm

11) 3/1/00 MMW 21.1

9:12 “Problem: Well is off gas V. hard now. Enough force to blow water out of auger to vent top of Mast 40’ .....will let vent; stop work

9:50 Still off gassy LEL 6” above borehole augers 50% to 350% w/20.8% O2 a definite explosion hazard (Rig engine was turn off @ 9:12

10:40 Still off gassy  
H2S level 10 ppm 6’ above top of auger. (Breeze is becoming stiffer). Still an explosive hazard @ borehole  
Can smell methane gas in air around rig @ times

12:08 Have been looky [*sic*] @ other potential sites since 10:00 today.  
Still an explosive hazard @ top of casing  
From 9:10 to 9:13 well acted like a Geysers.  
From 9:13 to 9:40 the gas pressure would force water 1-2’ above top of auger.

9:40-11:00 gas presser [*sic*] enough to force water out of top of auger @ = of at least 2 GPM  
Currently no water flowing out of casing however can still hear gas bubbling through Water.  
Stuck my 4-gas inside auger @ report  
O2 @ 8.0%  
LEL off range  
500 ppm H2S .....

12) (This is an example of all the quarterly reports that we found for this section of the reports which appear to note H2S potential problems. The reports are from the Los Angeles Regional Water Quality Control Board. Mr. Mikowski, of Public Works, personally reviewed these documents as part of his assessment of the LARWQCB’s work at the site as noted in exhibit— He does not include this information, in fact, states that there were no odor reports by the LARWQCB Reports that he reviewed.): **FOURTH QUARTER 1999 GROUNDWATER MONITORING AND PROGRESS**

REPORT OCT.-DEC 1999 prepared for Playa Capital Company LLC ; Prepared by Camp Dresser & McKee

(SEE EXHIBITS)

12/2/99; 10610-27122 GW4 QTR ; depth to water 7.34 (feet)

Observations/Comments

ODOR strong

Strong Odor

Odor

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“

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11/29/99; 10610-27122 GW4 QTR; depth to water 16.76 (feet)

Rotten Egg Odor

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13) (1967- ) LOS CITY PLANNING DOCUMENT 15808: Revolves around the City of Los Angeles’ proposed ordinance repealing the exception ordinance authorizing oil wells in the Venice Peninsula area (circa 1930-31). The document reveals LA City knowledge of Playa del Rey/Venice oil field problems prior to the EIR approval for the Playa Vista Project. A recent document, 1998 Paragon Westwind Associates, L.P. development in the Marina area was also copied within the 15808 papers. The City Planning Dept. copied document 15808 for us. The 1998 Paragon Westwind Associates, L.P. papers, inside 15808, were signed by Garland Cheng on behalf of Con Howe, the Head of LA City Planning. As the 15808 document was at LA City Planning’s current offices, it apparently, has been kept close at hand for use in current Zoning and Code applications which makes it a currently applied and used, document.  
 (SEE EXHIBIT 8)

Example from 15808:

We believe these examples and those in the exhibits of 15808 demonstrate a potential H2S problem throughout the Playa del Rey/Venice oil field and SOCALGAS operations, which is underlying or adjacent to the Playa Vista site. Further, this exhibit demonstrates information that should have been accounted for not only in recent reports but the ‘93-5 EIR as well. The language clearly demonstrates that the City was aware of the Playa del Rey/Venice oil field as having problems and that the oil field was extensive and integrated throughout the region which includes the Playa Vista site.

Pg. 9 “...It is the only oil field in the Los Angeles Basin producing quite sour petroleum crude. The term “sour” means that there are sulfur compounds in the crude oil. When these are exposed to the atmosphere the odorous material evaporates and is quite noticeable at extremely low concentrations.”

Pg. 8 LADBS:

“The Department would object to adoption of any ordinance permitting structures other than those exempt in the ordinance to be constructed closer than 50 feet to any subterranean type of oil well in the Venice Peninsula area.... Area is needed around an oil well for the maneuvering of equipment and installation of guy wires, etc. Any structure within 50 feet would greatly increase complaints to this Department and hinder repair and maintenance of the wells.”

Pg. 14 “This field represents the worst example of petroleum housekeeping and the City is partly responsible.”



Pg. 17, “13. The Southern California Gas Company operates the 6 most southerly wells on the Peninsula. Such wells are not primarily for oil production, but rather are an integral part of the Company’s Playa Del Rey underground gas storage reservoir. This reservoir is of utmost importance to gas users in the Los Angeles Basin since it enables the Company to have gas available when the need is greatest. Continued maintenance of these 6 wells is absolutely necessary in order to control the build-up of pressure in the area.”

**STATEMENT OF THE SOUTHERN CALIFORNIA GAS COMPANY 15808:**

“The Southern California Gas Company operates six wells on the Venice Peninsula.... The wells are an integral part of the company’s Playa del Rey underground gas storage reservoir.... All six of our wells on the Venice Peninsula are completed in the same zone as the main storage reservoir. Five of them (*names...*) are pressure-connected to the main reservoir. North of these wells is a barrier which exists between them and the balance of the wells in the Venice Peninsula which produce from the same zone. Since there are a number of abandoned wells in the same area as our five wells whose abandonment work is of unknown or doubtful quality, it is absolutely necessary that we continue to operate these wells in order to control the build-up of pressure in the area. Also, since the character of the barrier is unknown, the control of pressure build-up in the area lowers the possibility of a break-through to the area north of the barrier where there are also a number of abandoned wells of questionable abandonment work. The sixth well (Troxel No. 1) is located north of the barrier. It was acquired so that we would have a well to monitor any breakthrough and take appropriate remedial action.”

SOCALGAS is currently involved with our CPUC investigation which is precluding them from selling off the properties attached to all the above wells. There has been no study, certainly not to any public or CPUC knowledge, to determine how the repressurization of the area is affecting the wells in the area. Keep in mind that all well abandonments eventually leak, according to the Division of Oil & Gas—Belmont Learning Complex Hearings. Also, keep in mind that current well abandonment standards do not provide for the enormous pressures that are in the Marina and Playa del Rey area.

**CITY PLANNING DEPARTMENT STAFF REPORT TO THE DIRECTOR’ OF PLANNING PG. 1.** “It must be noted that six of the wells on the Peninsula are now an integral portion of the Southern California Gas Company’s natural gas storage facility which extends far beyond the geographical boundaries of the Venice Peninsula.”

14) Historical ‘93-5 EIR Playa Vista documents were apparently not utilized in the CLA Report as there is no accounting for many citations of oil field information and other potentially toxic or hazardous information. The unused information includes, but its not limited to, the following:

**KNOWLEDGE OF VARIOUS ZONES OF GAS UNDERLYING THE REGION AS DEMONSTRATED BY:**

1. 1984 Leroy Crandal [*sic*] Report for Summa Corp.—Playa Vista site pg. 8 Appendix E-17 (EIR “93-5) describes the Playa del Rey/Venice oil field as essentially depleted and producing

from 2 zones; an upper zone at approximately 4,000 feet and a lower zone at 6,000'. SOCALGAS currently uses the lower zone for gas storage.

15) 1998—LeRoy Crandall and Associates PARCEL A

The Report describes Pg. 9, an easement of SOCALGAS to store gas at 500' - 7,000'. Gas is stored generally at 6,200' (DOG '74) although easement allows 500'-7,000'.

Pg. 14 notes the Playa del Rey oil field as a subsidence area in the Urban Geology Master Plan. (CA. Division of Mines & Geology 1973)

16) 1991 LAW/ CRANDALL Parcel A;

Aug. 7, 1991—H<sub>2</sub>S found in the Boring Logs ( attributed to decomposing organic matter)—findings of sulfides, benzene and toluene.

Benzene and toluene are oil field gas constituents. Area A was not utilized as a commercial area as was Area D, for the Howard Hughes and McDonald Douglas industrial sites, therefore it seems remiss to ignore the benzene and toluene found in Area A for the possibility of it being oil field generated.

Important to note, is the gas zone information, because the City of Los Angeles (15808) was already aware that the Venice oil field area was connected to, and an integral part of, the much larger area of the Playa del Rey oil/gas field area. Knowledge of the two zones was known by SOCALGAS, THE CITY OF LOS ANGELES AND LEROY CRANDALL AND THUS THE DEVELOPERS OF THE PLAYA VISTA SITE. THEREFORE, FOR THE '93, '95 EIR TO STATE THAT, UNLIKE THE FAIRFAX AREA, THE PLAYA VISTA SITE HAS NO SHALLOW ZONES OR POCKETS OF GAS THAT CAN SEEP TO THE SURFACE, WE BELIEVE, DEMONSTRATES THAT THE CITY, SOCALGAS AND THE DEVELOPERS WERE DISINGENUOUS AND ACTUALLY KNEW OTHERWISE, THAT THE SHALLOWER ZONE OF GAS WAS EXISTANT [*sic*] AS A POTENTIAL SOURCE OF SEEPAGE FOR HAZARDOUS OIL FIELD GAS.

17) 1990—LEROY CRANDAL [*sic*] & ASSOCIATES, June 20, 1990 (pg.3)

– reviewed photos, maps and WELL RECORDS—Of the well records cited as being reviewed was UNIVERSITY CITY SYNDICATE—the well record for sites the fact the well blew gas and flowed millions of cubic feet of gas before it was reabandoned. The encounter of gas was in the shallower zone.

Thus, this information establishes, once again, the foreknowledge, prior to the completion of the '93,5 EIR, that this zone of gas was existent and a potential threat due to seepage to the surface.

The CLA REPORT, we believe, continues in the attempt to downplay and mislead the public with regard to the hazards at the site. Playa Capital and its consultants, who are the majority source, for the Report, have a history of non-disclosure of site problems. A further example, is the ENSR Report, .a report done for Playa Capital that was to characterize site environmental problems that would cost more than 1 million dollars to remediate or mitigate.

The ENSR Report established in 1997, that the Playa Vista site has oil field gas migration problems and yet, Playa Capital did not disclose this information to the City. We members of the public, found the report and took it to LA Building & Safety, who then required soil gas sampling to occur on the site in '98-9. Playa Capital continued, until approximately 1 1/2 year [sic] ago, to claim in their FACT SHEET to the public, that there was so little gas, that they did not have to mitigate the site but that because they were Playa Capital, they would. Playa Capital, until approximately 1 1/2 years ago continued to claim that any gas seeping to the surface, was SWAMP GAS. (Exhibit 20)

From the information already contained in the City Planning Document 15808; the City was aware of sour-H<sub>2</sub>S concerns of the Playa del Rey/Venice oil/gas field. For Law/Crandal [sic] to not explore the possibility of the H<sub>2</sub>S as being generated by oil field activity appears to be a lack of due diligence. However, this historical information of H<sub>2</sub>S being found across the Playa Vista site as well as the newer '97-8 Archaeological H<sub>2</sub>S information and the '99 Boring Log data that reflects high levels of H<sub>2</sub>S as well as the LARWQB data demonstrating the apparent 'rotten egg' odor of H<sub>2</sub>S, is critical information. It is incomprehensible that this data was not accounted for in the CHIEF LEGISLATIVE ANALYST'S REPORT. Currently, the CLA Report describes H<sub>2</sub>S on the site as virtually non-existent. Without having done an actual H<sub>2</sub>S investigative study and without having utilized the old historical data and the newer data, the CLA Report improperly assesses the site. Furthermore, the improper assessment appears to be willful and deliberate.

RE: CLA RESPONSE—"LARWQCB, in coordination with OEHHA..."

"The health based remediation strategy established for the Playa Vista Development Project site is comprehensive in nature and will consider BTEX soil gases in the cumulative assessment completed for the site as remediation activities are completed."

Work and data demonstrate this statement to be false and/or misleading. Our communications with LARWQCB regarding the oil field gases and H<sub>2</sub>S at the site demonstrate that the LARWQCB has had nothing to do with these issues nor, will they.

April 18, 2001, LARWQCB letter to Ms. McPherson:

"During you [sic] phone calls you expressed concern over the presence of methane gas; hydrogen sulfide gas; and benzene, toluene, ethylbenzene and xylene (BTEX) gases at the Playa Vista site; and the Regional Water Quality Control Board's responsibility in evaluating the presence of these gases. Your letter of March 20, 2001, reiterated your concerns. The following are responses to the questions presented in your letter:

Question 1

'WAS AN EVALUATION OF THE OIL FIELD GASES MIGRATING UP FROM THE PLAYA DEL REY OIL FIELD AT THE PLAYA VISTA SITE OR SURROUNDING REGIONAL AREA (PLAYA DEL REY BLUFFS OR MARINA DEL REY) DONE BY THE LARWQCB?'

The RWQCB is aware that the Los Angeles City Department of Building and Safety (LACDBS), through an independent consultant (Exploration Technologies, Incorporated (ETI) is conducting its own evaluation regarding the source, migration, and presence of these gases. The RWQCB is

also aware that LACDBS will be reviewing the results of these evaluations, developing mitigation requirements (as deemed necessary by the LACDBS) and will be approving all grading and building permits and conducting all related inspections. The RWQCB is also aware that the City of Los Angeles, Office of the Chief Legislative Analyst (CLA) has completed its own independent review of existing information regarding your concerns and prepared a report titled "City Investigation of Potential Issues of Concern for Community Facilities District No. 4 Playa Vista Development Project" (CLA REPORT) dated March 2001 presenting their evaluation. In addition, CLA contracted with an environmental consultant to evaluate potential health effects of BTEX and H<sub>2</sub>S and the results of this additional evaluation are presented in the report titled 'Human Health Risk Assessment, Playa Vista Development, Los Angeles California; (Risk Assessment) dated February 6, 2001, by Kleinfelder Incorporated. Regional Board staff reviewed and commented on the CLA Report and Regional Board staff requested the Office of Environmental Health Hazard Assessment review the Risk Assessment. A copy of our letter dated April 9, 2001, addressed to CLA presenting our comments is attached for your review.

The California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGER) [*sic*] is the state agency charged with regulating the exploration and development of oil and gas resources and responsible for approving the construction, operation and closure of wells used to tap these energy resources. Copies of any documents or letters, or questions or concerns regarding the presence use or potential problems with these activities should be sent to DOGGER [*sic*], with a copy sent to LACDBS."

#### QUESTION 2

"WAS AN EVALUATION OF THE H<sub>2</sub>S OR TOXICS ELEMENTS OF THE PLAYA DEL REY OIL FIELD GASES THAT ARE MIGRATING TO THE SURFACE AT PLAYA VISTA OR SURROUNDING REGION (PLAYA DEL REY BLUFFS OR MARINA DEL REY) DONE BY LARWQCB?"

#### ANSWER TO QUESTION 2

"Please See Answer to Question 1, above."

#### QUESTION 3

"WAS THERE AN EVALUATION PROVIDED TO THE CITY OF LOS ANGELES CHIEF LEGISLATIVE OFFICE (CLA PLAYA, VISTA REPORT) PERFORMED BY LARWQCB FOR THE CLA REPORT OF THE PLAYA VISTA SITE, IN PARTICULAR REGARDING THE PLAYA DEL REY OIL FIELD GASES THAT ARE MIGRATING TO THE SURFACE AT THE PLAYA VISTA SITE?"

#### ANSWER TO QUESTION 3

"Please See Answer to Question 1, above."

#### QUESTION 4

"How will the LARWQCB participate or respond to conditions of migrating oil field gases moving up SOCALGAS well bores (as shown in the Inter-Office Correspondence of SOCALGAS 11/20/91)?"

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**ANSWER TO QUESTION 4**

“Please See Answer to Question 1, above.”

Through this correspondence and multiple previous correspondence and phone conversations that have been documented, it makes clear that the LARWQCB is not and does not involve itself with the BTEX or H2S conditions at the Playa Vista site (attachments). This letter was also forwarded, cc'd to Barbara Garret, Chief Legislative Audit City of LA as well as David Hsu, LA Building & Safety Department therefore, the response in the CLA Report to the public and LA City Council, in our opinion, portrays a false and/or very misleading statement of the truth. This misleading portrayal of the truth gives both the public and the City Council, a false sense of security regarding these very critical and potentially hazardous issues. LARWQCB & OEHHA both merely reviewed information that was incomplete as well as misleading.

**CLA QUESTION #5 ANSWER, CONTINUED -**

“The LADBS has established procedures to ensure close coordination between the City and the LARWQCB as site development progresses. Therefore, potential cumulative impacts associated soil and groundwater contamination, including BTEX, will be addressed in a manner that is protective of human health.”

**CLA ANSWER**

This is, in our opinion, an intentionally false and misleading statement that has been designed to give the public and the LA City Council a false sense of security regarding the oil field BTEX and H2S issues. The LADBS does not involve itself with the health impacts of any chemical. Mr. David Hsu has consistently, through the past several years made it very clear that LABDS does not involve itself in health related matters and because of that relies upon other departments or agencies to fulfill that obligation.

“...LADBS) emphasized that it does not have expertise on the environmental issues and therefore relies on approvals from other department and entities on such topics.” Dec. 3, 1999, Andrew Adelman General Manager to Honorable Nick Pacheco, Chairman, Housing and Community Redevelopment Committee.

Also, to our knowledge, which is well documented, LADBS does not labor itself with coordination with the LARWQCB. Indeed, it has been Grassroots Coalition & Spirit of the Sage Council that has caused the interfacing of these entities due to our queries to both parties and the City of LA regarding these issues. It has been our experience, that is well documented, that LA City Planning, the lead agency and coordinator for the Project. has helped forward the disengagement of departments and agencies working in concert regarding this Project.

**FURTHERMORE,**

Grassroots Coalition and Spirit of the Sage Council have remained constant in our requests to have the STATE EPA Dept. of Toxic Substance Control (DTSC) become an agency for oversight of the oil field gas issues.

Recently, through our oil field gas investigation and involvement with DTSC and with the concerned communities surrounding the Playa Vista site, namely the Playa del Rey bluffs and the Marina area we are now pleased to have the involvement of the DTSC for this regional oil field gas issue. The Coalition to Save the Marina, John Davis and Dan Cohen have been instrumental in helping bring together the DTSC with their community due to H<sub>2</sub>S outbursts and leaking oil/gas wells in the Marina area. The DTSC are now also including Playa Vista in that regional review. Already, Grassroots Coalition and Spirit of the Sage Council have brought the Federal EPA into the contamination issues of the Playa Vista site for their oversight. **NO INFORMATION FROM THESE AGENCIES WAS INCLUDED IN THE CLA REPORT. THEIR INVOLVEMENT IN THE SITE WAS NOT INCLUDED IN THE CLA REPORT.**

The CLA OFFICE was not responsive to the Los Angeles Unified School District's request made by Angelo Bellomo, head of the LAUSD Safety Team, to have the IMMEDIATE INVOLVEMENT of the STATE EPA—Dept. of Toxic Substances Control as a participatory member of the CLA Task Force that was given the task of compiling, reviewing and requesting information from what was supposed to be a wide variety of expert sources, in the investigation of the geotechnical issues of the Playa Vista site. LAUSD has been aware of improper site studies, done for sites like Playa Vista. The Belmont Learning Center was a prime example. Due to the fact that there was a proposed school site at Playa Vista and the fact that several surrounding LAUSD school sites have had some preliminary testing for oil field gases and found low levels of gas, LAUSD's Safety Team asked to have the immediate involvement of DTSC for the investigation of the Playa Vista site. Earlier, the Safety Board member, Julie Korenstein had also advised, in writing, that the City please consider doing a SEIR for the Maya Vista site due to concerns of oil field gas hazards. The City refused to perform a SEIR. The City CLA Task Force also did not allow the involvement of DTSC.

Other volunteer oil/gas field and gas migration experts that the City had earlier asked for help from regarding concerns elsewhere in the City were denied access to the Task Force. Resumes of various experts were given to David Hsu of the LADBS Grading Div., who, then personally forwarded the resumes and requests to the CLA OFFICE. Later, when asked why these experts were not utilized, the CLA OFFICE claimed they did not receive the resumes. When further queried about the expert participation, the CLA OFFICE was simply nonresponsive.

DEPT. OF CONSERVATION—MINES & GEOLOGY SPECIAL PUBLICATION 117:  
Pg. 48 “Reviewers must recognize their limitations. They should be willing to ask for the opinions of others more qualified in specialty fields.”

STATE EPA, THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL:

DTSC reviewed the CLA Report documents:

- City Investigation of Potential Issues of Concern for Community Facilities district No. 4 (CIPIC), March 2001;
- Human Health Risk Assessment (HHRA), Kleinfelder Inc., February 6, 2001;

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– Health-Based Remediation Goals (HBRG), Integrated Environmental Services Inc., February 2000.

“These documents evaluate potential risk factors associated with the site. It is DTSC’s understanding that the purpose of the HHRA is to specifically address the indoor air inhalation exposure pathway associated with benzene, toluene, ethyl benzene, xylene (collectively BTEX), and hydrogen sulfide, while the purpose of the HBRG is to conservatively calculate health based remediation goals for all potentially hazardous constituents in soil and groundwater. With regard to these documents, DTSC has the following general comments:

– From the information DTSC has been given, it appears that an ecological risk assessment [w]as not performed for the site. DTSC recommends that an ecological risk assessment be performed as a matter of policy, particularly due to the sensitive ecosystem in and surrounding the project.

– The documents state that future land use of the site includes residential use, yet a residential exposure scenario was not provided in the HBRG’s [sic].

From the information that has been given, the HHRA and the HBRG for the Playa Vista Development site are incomplete, and DTSC is requesting additional information as outlined in the attached comments.” (EXHIBIT 10)

The DTSC ENGINEERING SERVICES UNIT commented on the CLA REPORT re: PLAYA VISTA DEVELOPMENT PROJECT METHANE MITIGATION, LOS ANGELES, CALIFORNIA

#### Summary of Review:

1. Table 2-1, footnote 4, -Level 11 and Level 111 include a mechanical ventilation system that will be triggered when the methane concentration reaches 37,500 ppmv under the impermeable membrane. Although the document indicates that the City of Los Angeles, Department of Building and Safety (LABDS) concluded that the proposed methane mitigation measures would adequately protect public safety, ESU recommends the trigger level be set at 12,500 ppmv which is 25% of the lower explosive limit (LEL) of 50,000 ppmv.

2. ESU recommends considering subsurface mechanical ventilation in Level 111 area where the methane concentrations exceed 12,500 ppmv.

– ESU recommends to review the venting system design which is in progress when it becomes available.

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The STATE EPA, Dept. of Toxic Substances Control has stated the CLA REPORT to be incomplete. The engineering division of DTSC expresses that changes should be made and

elements need to be reviewed. The DTSC commented on the CLA REPORT. It is important to note that the excluded historical and updated information of the Playa Vista site was not a part of the DTSC's written evaluation of the site.

What we believe can be nothing other than a deliberate refusal to include critical and pertinent data.

#### ISSUES NOT ADDRESSED OR LACKING IN AUTHORSHIP OR SUPPORTING DATA:

The 'final' CLA REPORT was released following response to several community comments and questions. Grassroots Coalition, ETINA, SPIRIT OF THE SAGE COUNCIL

Questions and comments did not receive a complete response. The majority of information, of which we requested to be a part of the review process, was not included. Multiple query letters and comments regarding most of what is included in this package, had no response. Multiple attempts on our part to meet with the CLA TASK FORCE regarding critical issues, had no response or we were refused.

– Of concern to us also, is another possible violation of the CA. PRC Code 2690-99.6, the chapter regarding the Seismic Hazard Mapping Act requirements, and that would be, it appears that the Dept. of Conservation, Mines & Geology has only reviewed a few sections of the CLA REPORT. The sections reviewed, including the proposed Lincoln Blvd. Fault, are very narrow in their scope of review of the environs and the Playa Vista site. Since the area has already been deemed to be dangerous due to the extremely high concentrations of emanating oil field gases, the narrowness of the review by the Div., we believe, skews and misleads the reader as to the actual critical issues of the entire site's geotechnical problems. It would appear that the City of Los Angeles has deliberately abused the Div.'s involvement in these serious matters, by making it appear that all the critical issues of the Playa Vista site have been adequately dealt with that fall within seismic and liquefaction, landslide potential hazards. This is far from true. It concerns us that the Div., on its own volition, has not considered nor commented upon this, due to the site's known liquefaction etc. hazards. One can only assume that the Div. has the ability to also recognize that the comments with which the Div. applied itself, are very narrow and do not reflect the scope or range of geotechnical issues that must be adequately investigated and resolved as per the Seismic Hazard Guidelines and Special Publication 117.

The City of Los Angeles, the Dept. of Building & Safety; Dept. of Public Works—Engineering, the LA Fire Dept., and LA City Planning are all on record as stating they do not have the expertise to deal with the gas mitigation problems of the Playa Vista site. (exhibit 1—DEC. 8, 1999 Housing & Redevelopment Comm. Hearing)

#### CHAPTER 7 PG.47 SP 117

“THE REQUIRED TECHNICAL REVIEW is a critical part of the evaluation process of approving a project. The reviewer ensures compliance with existing laws, regulations, ordinances, codes, policies, standards, and good practice, helping to assure that significant



geologic factors (hazards and geologic processes) are properly considered, and potential problems are mitigated prior to project development.”

At the Playa Vista site the mitigation is in an ongoing design phase with ongoing development concurrent with that changing design formula. We believe this is dangerous and the City has not demonstrated any functioning system. The LA Building & Safety General Manager, Andrew Adelman describes the gas mitigation systems as being in a “progressive design phase.” (attachment letter).

The Dept. of Conservation cites in Special Publication 117 (1997) Guidelines For Evaluating and Mitigating Seismic Hazards, that, “A report that is incomplete or poorly written should be not approved.” Pg. 48.

Please respond as soon as possible. Please call if you have any questions or comments regarding this request.

THANK YOU,

ETINA—Environmentalism Through Inspiration and Nonviolent Action  
 Andrew Beath Board Member  
 Patricia McPherson, Board Member  
 3749 Greenwood Ave. LA CA 90066 310 397 5779  
 Grassroots Coalition, Patricia McPherson

### **Response 35-30**

The attachment is a compilation of issues from the commentor regarding the commentor’s opinion that the CLA Report, attached as Appendix J-6 of the Draft EIR, was inadequate. As discussed in Subsection 2.2.4.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 710-713, between June 2000 and May 2001, the City of Los Angeles Office of the Chief Legislative Analyst (CLA) supervised the completion of a study evaluating soil gas and other safety issues related to development at the adjacent Playa Vista First Phase Project so that the City could decide whether to provide Mello-Roos financing for some of the infrastructure related to the adjacent Playa Vista First Phase Project. As part of the CLA review process, the City’s Department of Building and Safety retained an independent peer reviewer, Dr. Victor T. Jones III of Exploration Technology, Inc. In addition, the CLA retained Kleinfelder, Inc. as the CLA’s consultant, and consulted with the City’s Bureau of Engineering, the City’s Department of Building and Safety, the City Attorney’s office, the State’s Division of Gas and Geothermal Resources, the California Department of Conservation Division of Geology and Mines, and the Regional Water Quality Control Board, all of whom independently reviewed technical issues regarding the Playa Vista site. As part of that review process, the Applicant also retained its own consultants, including Dr. Kul Bhusan, Mr. Nabih Youssef, Dr. Isaac Kaplan, Dr. Kerry Sieh, Dr. Thomas Davis, Dr. James Embree, and Mr. John Sepich, regarding the myriad of issues addressed during the CLA’s review process.

Furthermore, these issues were addressed in appeals brought by the commentator, among others, to various grading and building permits issued by the Department of Building and Safety to the Applicant for construction of the First Phase Playa Vista Project. In July, 2000 and June, 2001, the City Board of Building and Safety Commissioners denied these appeals. Please see Board File nos. 00130, 00146-00153, 00161-00162, 00170-00180 and 010041-010042, which are included in the reference library for the Final EIR.

Please also see Topical Response TR-12, Soil Gas, on page 477 and Responses 35-1 to 35-28. Section IV.A, Earth, and Section IV.I, Safety/Risk of Upset, of the Draft EIR for a discussion of issues regarding methane and other soil gas, subsidence, liquefaction, earthquakes, and the Southern California Gas Company storage facility.

In addition, many of these issues were raised in a lawsuit filed by the commentator, among others, entitled *ETINA, et al. v. the City of Los Angeles, et al.*, Los Angeles Superior Court Case No. BS070757. The lawsuit requested a Subsequent EIR for the First Phase Project. On February 10, 2004, the court denied the petition and found in favor of the City and the Applicant.

### **Comment 35-31**

From: Kathy Knight

Attached please find comments by John Robertson & Michael Glueck to be attached to Grassroots Coalition Playa Vista Phase 2 comments.

Thank you.

[Note: The following pages are from Playa Vista First Phase and Master Plan Drafts and Final EIR, Final EIR, May 26, 1993 (Clearinghouse No. 90010510), pp. W-42 - 1 through 6 and pp. W-43 - 1 through 18]

COMMENT No. W-42

John O. Robertson, Jr., Ph.D., Earth Engineering Inc.

#### COMMENT W-42.1

The following information should be available to you as you decide the requirements for the EIR report. I am troubled by the fact that these details, widely known, were not included in the report. If I can be of any help, please feel free to write me and I or my firm would be glad to help you.

Overview Review of Gas Explosion Hazards:

The Playa Vista project is planned to be constructed both over and adjoining the Playa del Rey underground gas storage project that is operated by Southern California Gas Company. The Draft Program Environmental Impact Report for Playa Vista [#EIR No. 90-0200-SUB(C)(CUZ) (CUB)] has inadequately addressed the serious known explosion and health hazards that are associated with the underground migration of gas for this project in the Earth and Air Quality Sections.

Several reports published by the State of California, Division of Oil and Gas (D.O.G.), see attached, identify a serious gas migration problem, underlying this project in which massive quantities of natural gas (see Table I at rear of report) have migrated from the storage project into the surrounding geologic structure. A high percentage of this gas has migrated from AREA B (as identified on Fig. V 1-3 of the impact report) to AREA A. Where the remainder of the migrating gas has gone is unknown (see Fig. 1 below).

This gas, lost into the formation, will continue to migrate into the sub-strata using fault planes and old wellbores as paths of migration until the gas reaches the surface. Several likely paths for the gas to migrate will be to the surface in AREAS A and B. A reasonable expectation at Playa Vista, is for this gas to gather in “pockets” in relatively shallow zones underlying the project. This same phenomenology [*sic*] was responsible for the Ross-Dress-For-Less Department store explosion in the Fairfax area of Los Angeles in March 1985. Here the gas collected under a clay cap at a depth of approximately 40 feet, until the pressure built-up sufficiently for gas to migrate the additional 40 feet under the Department store, under local sidewalks, and large paved areas. Following the gas explosion, set off by a woman punching a time card in the basement of the Ross store, the department store caught fire. The fire also burned for several days through cracks in pavement and sidewalks. Twenty-three people were seriously injured.

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Fig. 1—migration of gas

See following page.

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[from Playa Vista First Phase and Master Plan Drafts and Final EIR, Final EIR, May 26, 1993 (Clearinghouse No. 90010510), p. W-42 - 2]

The city of Los Angeles Building Code was modified, especially for new construction in the area of the above explosion. This has included the requirement to install an impervious (plastic type) barrier under the foundation slab in order to prevent the migration of gas into the structure. Unfortunately, at least several of these barriers under structures to satisfy this Building Code have exhibited leakage of gas through the so-called imperious [*sic*] barrier. It is our opinion that part of the problem is that the barrier is easily damaged during construction. Gas monitoring devices have also been required by the City of Los Angeles in some commercial structures in the Fairfax area in order to deal with the hazards of underground gas migration. Unfortunately,

2/26/44

VII. Comments from Persons and Organizations Consulted

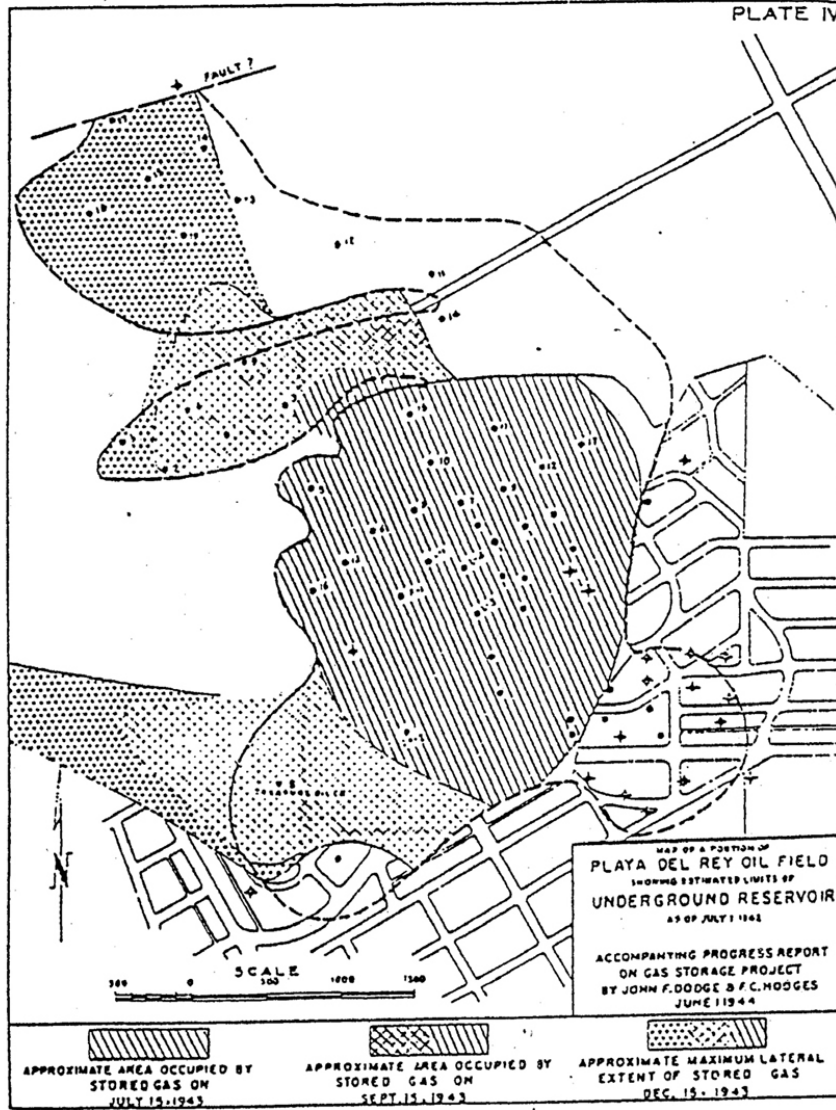


Fig. 1 - migration of gas

similar systems have not always been successful in other parts of the country in a timely manner to warn of problems.

Because of the presence of large quantities of natural gas leaking from the Playa del Rey gas storage project, a detailed near-surface soil gas monitoring and review is essential to help identify existing migrations paths of gas migration and help establish special building precautions and locations which are necessary for any Playa Vista development.

#### RESPONSE W-42.1

According to Messrs. Michael Middleton and R. E. Corbaley of The Gas Company and the Department of Conservation/ Division of Oil, Gas, and Geothermal Resources, respectively, there is no vertical migration problem at Playa del Rey and the conjectured presence of large “quantities of natural gas leaking from the Playa del Rey gas storage project is nonexistent.”<sup>1,2</sup> There is one attached report referred to in the comment, “Gas Storage in the Playa del Rey Oil Field,” by John Riegle, published in 1953. This report describes unexpected migration of gas to the north and west. According to The Gas Company, the gas migration was unexpected because the reservoir boundaries were originally thought to encompass an initial areal extent described in the report. Subsequent events in the period from 1942 to 1953 proved the areal extent of the reservoir to be larger than initially projected. Gas migrated laterally and pressured up the oil-depleted outlying areas of the same continuous reservoir. Realization of this lateral gas migration in the reservoir resulted in an operating strategy to recover the gas from the fringes of the reservoir. No gas was ever truly lost. No vertical gas migration to the surface has occurred.<sup>3</sup>

Footnote 1 Middleton, Op Cit.

Footnote 2 Mr. R. E. Corbaley, Environmental Supervisor, State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, letter dated February 3, 1993.

Footnote 3 Ibid.

The report referenced in the comment also states on page 31 that, “Both sets of graphs demonstrate that the reservoir behaves like a closed container.” According to The Gas Company, the table in the report that is referred to in the comment, Table I, does not support the contention that “massive quantities of natural gas have migrated from the storage project.” In fact, it shows most of the injected gas as being recovered by wells within the storage reservoir. The remainder of the migrating gas is explained on page 31 of the cited report as losses attributable to “cushion, fluid replacement, and entrapped gas,” which are normal occurrences in any gas storage project and have no relationship to gas migration out of the storage reservoir.<sup>4</sup>

Footnote 4 Ibid.

With regard to the comparison in the comment to the Fairfax area and the need for special construction techniques, please refer to Response to Comment Nos. W-24A.6 and W-24A.7. With regard to gas monitoring, please refer to Response to Comment No. W-18.18.

COMMENT W-42.2

A second potential problem not properly addressed is that some of the figures in the environmental report show only a few of the wells that we have noted on the D.O.G. maps for this area (see Fig.2). As a general policy, no structures should ever be built over abandoned wells. If future problems develop with these wells, such as leaks, there is no way to properly re-abandon the well if a structure is over it. At the very minimum, an area of a 50' radius about the well and access to that area with heavy equipment, should be kept open at all times so that work can be done without removing structures.

RESPONSE W-42.2

No buildings will be constructed within fifty feet of abandoned wells. Figure V.I.3 in the First Phase Draft EIR provided the best available verified information from The Gas Company and as such indicates the location of all known active and abandoned wells on the project site. Please refer to Response to Comment Nos. W-24.6, and W-18.18 regarding building over abandoned wells.

—  
 Fig. 2—Plot showing wells for area of interest

See following page.

[from Playa Vista First Phase and Master Plan Drafts and Final EIR, Final EIR, May 26, 1993 (Clearinghouse No. 90010510), p. W-42 - 5]

COMMENT W-42.3

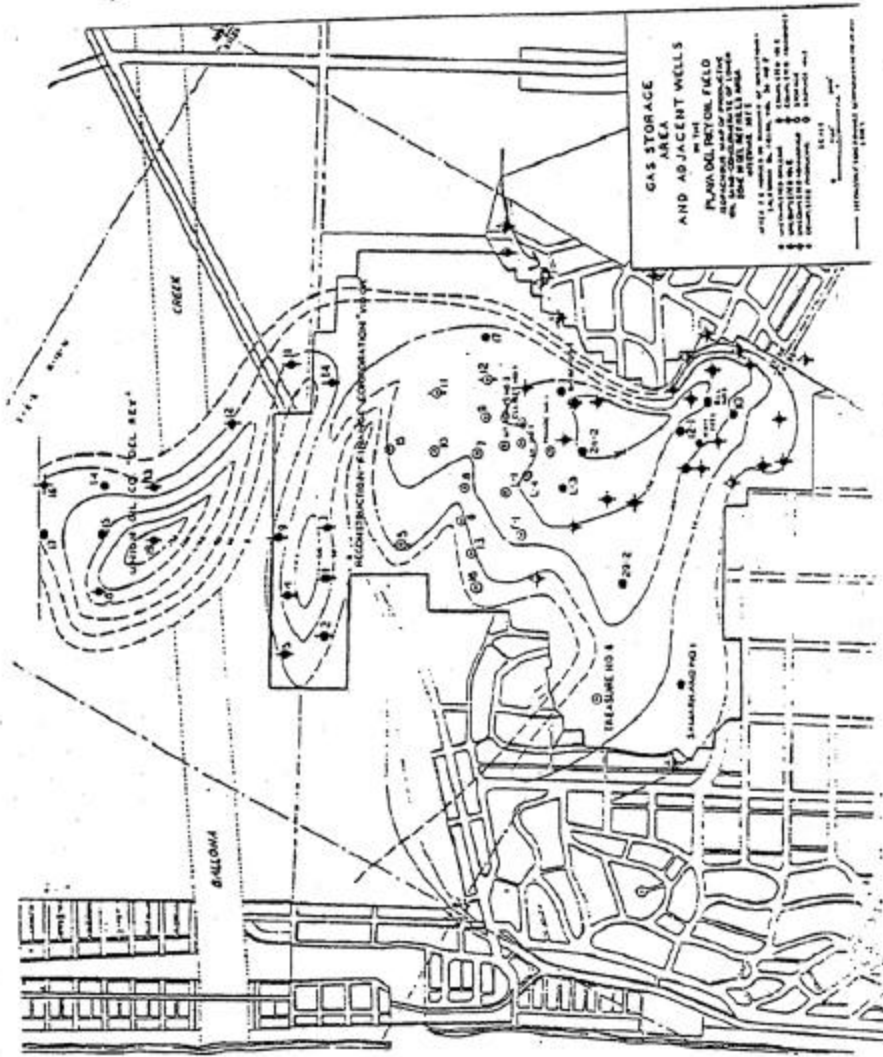
## Health Hazards:

In view of the documented evidence that large quantities of natural gas are migrating underground beyond the immediate confines of the Playa del Rey underground gas storage project, and in recognition of the acknowledgment by Southern California Gas Company that this natural gas contains benzene and toluene—both carcinogenic chemicals—it is essential that the health hazards of these chemicals be evaluated before the Playa Vista project is allowed to proceed. To properly test for these chemicals, one must first determine where the surface traces of the migrating gas are, and then carefully examine those soils for these chemicals.

This project is located downwind from the underground gas storage project area. The Southern California Gas Company has acknowledged that much of the odor in the area is coming from leaks in the surface equipment. Since the carcinogenic materials are also present in this leaking gas, the health hazard from this source should also be carefully reviewed.

VII. Comments from Persons and Organizations Consulted

6/20 KK



**FIGURE 2**  
Plot showing wells for area of interest

City of Los Angeles  
State Clearinghouse No. 90010510

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First Phase and Master Plan Drafts and Final EIR  
Final EIR - May 26, 1993

The vapors of toluene and benzene are both heavier than air, causing these chemicals to concentrate near the surface (ground level) in the areas of the gas migration paths. This is in contrast to methane which when reaching the surface will rise into the air once it reaches the surface as it is lighter than air. Accordingly, this will result in larger concentrations of benzene and toluene in the soil near the surface exposure of the gas migration paths as the chemicals accumulate with time. The concern would be the potential of the benzene and toluene as a hazard, if a structure were built over a zone that has these contaminants, they could then migrate into structures built within the areas of AREAS A & B of the Playa Vista project. In order to evaluate the presence of benzene, a detailed study should be conducted.

### RESPONSE W-42.3

With regard to benzene and toluene concentrations, the potential affect [*sic*] on health, and monitoring programs, please refer to Response to Comment No. W-18.18. Also, please refer to Response to Comment No. W-42.1 referencing correspondence items from The Gas Company and the Department of Conservation, Division of Oil, Gas, and Geothermal Resources regarding benzene and toluene concentrations.

[from Playa Vista First Phase and Master Plan Drafts and Final EIR, Final EIR, May 26, 1993 (Clearinghouse No. 90010510), pp. W - 43 - 1 through 18]

### COMMENT No. W-43

Michael A. Glueck, M.D., V.P. Environmental Science & Technology, Inc.

### COMMENT W-43.1

Environmental Science & Technology, Inc. was retained by Ms. Pat McPhearson to evaluate the contents of the Draft EIR No. 90-0200 SUB(C)(CUZ)(CUB). In response, the following was prepared.

Attached you will find a copy of the comments submitted to your office concerning the Draft EIR No. 90-0200 SUB(C)(CUZ)(CUB). After reviewing the documents provided to our offices, it has been concluded that a lot of important questions have been left unanswered more importantly certain important factors not even considered. It is our belief that unless such basic issues as those mentioned in the attached documents are answered, the project be delayed.

The Draft EIR seems to lack the basic elements of an EIR generally prepared for such a project. The contents often include what is required to get a permit and not an impact analysis. The purpose of an EIR is to identify the impacts, which might positively or negatively affect the environment surrounding the project, develop an analysis of the impacts to identify the overall benefits or negative impacts and make a conclusion based on the impact analysis. Unfortunately, this has not been done during the preparation of this EIR.



There is insufficient/inadequate information in the Draft EIR, at its present condition, to adequately determine the true impacts of this project on the surrounding environment. Therefore, a more comprehensive and more precise EIR needs to be prepared to adequately address the overall impacts.

If you have any question concerning the information/comments in this document, please do not hesitate to contact me at (714) 833-3728 or fax your response to (714) 833-2737.

### Attachment

It's rather disturbing to review the draft EIR No. 90-0200 with State Clearing House No. 9001051 dated Sept. 1992. As a general rule, an EIR is intended to identify positive and negative impacts on the environment based on actual data, and analyze such information in a manner that is consistent with sound engineering principles, not a collection of generic statements as presented in this report. The report is a collection of a set of inconsistent statements which lack partial or full technical support.

This document in most cases states extremely generic statements and does not present sufficient site-specific data/facts. Furthermore, it lacks sufficient relevant and applicable mitigation measures.

### RESPONSE W-43.1

The reviewer's opinion that the information presented in the Draft EIR is not sufficient to identify the impacts of the project is acknowledged. However, it is believed that a careful reading of either or both the Draft EIR and the Draft Program EIR reveals that they together present some 2,175 pages of documentation which carefully, comprehensively and explicitly detail relevant site specific data, facts and impacts associated with or attributable to the First Phase and Master Plan projects. The analysis and judgments presented in the Draft EIR reflect the best judgment of the City of Los Angeles as to the potential impacts of the First Phase project, using accepted methodologies and scientific and factual data (State CEQA Guidelines Section 15151). In addition, where significant impacts are identified, the document presents extensive and comprehensive mitigation programs to reduce or eliminate the identified impacts. A consistent format is used throughout the document which presents data and analysis regarding the Environmental Setting, Environmental Impacts, Mitigation Measures, Adverse Effects and Cumulative Impacts for 27 separate environmental topics in which the proposed project has the potential to have a significant effect on the environment. For additional information regarding these issues please refer to Response to Comment No. W-37.2.

### COMMENT W-43.2

1. From the health risk point of view, this EIR lacks the following:
  - a) as required by AB-3205, no adverse health risks have been addressed to satisfy the requirements of such a Bill, nor have any of the mitigation measures been adequately discussed.

RESPONSE W-43.2

The main focus of Section V.I of the Draft EIR, Safety/Risk of Upset, is a discussion of potential health and safety risks associated with the proposed project to project residents and to residents adjacent to the site. These potential impacts have been addressed at great length in that section and appropriate mitigation measures have been provided on page V.I-25 of the First Phase Draft EIR. The comment refers to AB 3205, which is legislation passed in 1989 requiring that businesses with risk management and prevention programs (RMPPs) for handling hazardous materials give explicit consideration in their RMPP to the proximity to any schools and health care facilities. This is an administrative requirement having to do with the issuance of building permits for facilities dealing with acutely hazardous materials or emitting air contaminants. As discussed in Section V.I, page V.I-9, the City Fire Department is the administering agency for the RMPP program and would be requesting an RMPP to be developed for the on-site Water Reclamation Facility (WRF) if the Fire Department deems it necessary. The potential safety risks of handling chlorine and sulfur dioxide at the WRF are described on pages V.I-20 and V.I-21 of the First Phase Draft EIR. With adherence to the applicable regulations for transporting; storing, and handling these materials, as discussed on page V.I-21, risks to surrounding areas and facility employees would be reduced to acceptable levels.

COMMENT W-43.3

b) no catastrophic risk analysis has been performed to identify the risk of explosion associated with the gas (methane) migration from Southern California Gas Company's underground storage of gases as evidenced by division of Oil & Gas. (D.O.G.). Serious catastrophic effects are associated with such gas migrations. This problem has not been technically addressed in this report.

RESPONSE W-43.3

The potential risk for explosion due to gas leaks is discussed on pages V.I-17 and V.I-18, and was determined to be insignificant. According to The Gas Company, there would be no risk of catastrophic effects associated with underground gas storage. For additional discussion of any risks associated with gas migration and a comparison with other areas where catastrophic effects have occurred (i.e., Fairfax area), please refer to Response to Comment Nos. W-42.1 and W-24.7.

COMMENT W-43.4

c) significant levels of benzene and toluene have been associated with migration of underground stored gases within this region, as evidenced by Southern California Gas Company. No risk analysis for this problem has been addressed.

RESPONSE W-43.4

The Draft EIR concluded that there are no significant risks to project occupants associated with gas storage. For a discussion of the detection of trace concentrations of benzene and toluene which are associated with natural gas, please refer to Response to Comment No. W-18.18.

COMMENT W-43.5

Table II-2, page 45

a) Incorrect statements have been made under both Recommended or Code Required of Mitigation Measures and Net Unavoidable Adverse Impacts:

- Under grading and excavation—mitigation measures identified here are a group of generic statements. No data or analysis of data is presented to support “No Adverse Impact”.
- Excavation throughout the life of this project needs some hard core data calculations and dispersion modeling before it can be considered to have no adverse impact.

RESPONSE W-43.5

The potential impacts of grading and excavation activities, including estimated quantities of excavated soils, are discussed on pages V.A-14 through V.A-18 of the First Phase Draft EIR. These discussions also refer to other sections of the Draft EIR in which impacts from these activities are further discussed, including V.B.1, Air Quality and V.D, Biotic Resources. Fugitive dust analysis and fugitive dust mitigation measures related to grading and excavation are specifically analyzed and discussed on pages V.B.1-24 through 25, and V.B.1-52 of the First Phase Draft EIR. The analyses and data presented in the respective sections cited above support a conclusion of “no adverse impact” from grading and excavation activities. Several mitigation measures require more detailed geologic/soil studies be done and approved by the City in conjunction with individual buildings.

COMMENT W-43.6

b) Geologic Hazards—gas migration through the soil formations within this region cannot be considered “None” when significant quantities of gases migrate through the formation every day. [Table II-2, pg 47, (c)] .

RESPONSE W-43.6

With regard to the lack of potential for vertical gas migration through the formations beneath the site used for underground natural gas storage, please refer to Response to Comment No. W-42.1. The conclusion in the Draft EIR that there are no significant impacts associated with the underground storage of natural gas is supported by the information from The Gas Company that is expanded upon in Response to Comment No. W-42.1. Also, a Response to Comment

No. W-42.1 refers to correspondence from the Department of Conservation, Division of Oil, Gas, and Geothermal Resources regarding vertical gas migration through the underground natural gas storage site.

COMMENT W-43.7

c) Section “d.” entitled Seismic Hazard has not been addressed under Catastrophic or any of the conditions, nor has it been addressed properly. This problem needs special consideration, especially when subsurface gas migration is significant with this region. [Table II-2, pg 47, (d)]

RESPONSE W-43.7

The potential risk to project occupants from seismic events is analyzed on pages V.A-5 through V.A-12, pages V.A-18 through V.A-20, with recommended Mitigation Measures on page V.A-25. Subsurface gas migration is not considered to be a significant problem for the site for the reasons discussed in Response to Comment Nos. W-18.18, W-24.6, and W-42.1.

COMMENT W-43.8

d) Section “e” entitled Liquefaction Potential—mitigation measures identified in this report do not make economic sense. This section identifies some generic methods and does not mention how it suggests to perform these tasks. Impacts have to be addressed here not methods.

RESPONSE W-43.8

The impacts associated with liquefaction potential are described in Section V.A of the Draft EIR. The applicant has always been aware of this potential, as detailed geotechnical studies of the site have been available for over a decade (please refer to Appendix E, Volumes III through VI). The recommended mitigation measures, which are generally accepted engineering practices for the soil conditions described, are considered both economically feasible and effective in reducing any risks associated with liquefaction potential. Specific procedures would be determined on a building by building basis, in conjunction with the Department of Building and Safety, depending on the specific soil conditions and structure design.

COMMENT W-43.9

Table II-2, page 49

a) No actual calculations have been made to address the following:

i) Quantity of emissions from added traffic, construction equipment and mobile equipment on-site during the development process do not have site-specific information therefore improper mitigation measures have been addressed.

RESPONSE W43.9

The reviewer is offering a specific detailed comment while referencing information presented within the Draft EIR's Summary Chart. The purpose of the Summary Chart is to provide readers with an overview of the environmental impacts associated with the proposed development and not to provide all of the details associated with a particular analysis. A full range of emission control and mitigation strategies specifically focusing on pollutant emissions attributable to development of the project site are set forth on pages V.B.1-51 through V.B.1-54 of the First Phase Draft EIR. Since it is possible that construction could occur anywhere within the project site boundaries, the emission control strategies were specifically developed to mitigate on-site construction air quality impacts regardless of the portion of the project site which is under construction at any given time. For additional information please refer to Response to Comment No. W-21.1.

COMMENT W-43.10

ii) No practical quantification methods have been identified here for the overall emissions. When the emissions could have been reasonably estimated using emission factors, engineering estimates or other accepted methodologies, it was simply stated that "emissions could not be estimated because they are highly speculative." [page V.B. 1-25]

RESPONSE W43.10

The passage cited on page V.B.1-25 pertains to the quantification of volatile organic compound (VOC) emissions attributable to building materials and the application of architectural coatings. As stated on page V.B. 1-24-25,

"The quantification of VOC emissions from these two sources [building materials and architectural coatings] is based on the physical design of proposed buildings. Since no building design for structures located within the First Phase for Playa Vista has been identified as of this date, quantification of VOC emissions from building materials and the application of architectural coatings would therefore be highly speculative and as such is not presented within this analysis."

Although it has been concluded that quantifying VOC emissions would be highly speculative, all materials used in project construction which would generate VOC emissions shall be manufactured in accordance with South Coast Air Quality Management District (SCAQMD) rules and regulations which would reduce potential VOC emissions to an acceptable level. Pollutant emissions from all other sources are fully quantified in Section V.B. of both the First Phase and Master Plan Draft EIRs as well as in Appendices F-1 and F-2, Volume VII of the Draft EIR.

COMMENT W-43.11

iii) Page 51 clearly indicates significant problems with levels of various pollutants with this site, yet indicates no net unavoidable adverse impacts. This whole section has to be, fully re-evaluated for accuracy and consistency. In addition, it offers no reasonably actual mitigation measures. Simply stating project meets 1991 AQMP is technically nonsense.

RESPONSE W-43.11

The reviewer is in error in stating that the air quality section of the summary chart, Draft EIR pages II-49 through II-65, concludes that development of the proposed project would result in no net unavoidable adverse impacts. As stated under the Net Unavoidable Adverse Impacts column on page II-50 of the Draft EIR, development of the First Phase project would result in a regionally significant air quality impact. A greater level of detail regarding the significance of the project's regional air quality impacts is provided within Section V.B. 1 of the Draft EIR. As stated on pages V.B.1-47 of the Draft EIR, "construction, activity and post-construction occupation and use of the First Phase site would produce stationary and mobile-source pollutant quantities... resulting in significantly adverse Regional air quality impacts." The Playa Vista project has been proposed with an extensive and comprehensive set of mitigation measures which implement emission control strategies based on currently available and cost-effective technology, and provide the means by which future technological advances can be incorporated into the development of the First Phase for Playa Vista. The mitigation program for Playa Vista is set forth in the Air Quality Management Plan for Playa Vista, see Technical Appendix F-3, Volume VII for complete text. For additional information regarding project mitigation refer to pages H-49 through II-65, or pages V.B. 1-49 through V.B.1-57, or the Playa Vista AQMP.

COMMENT W-43.12

iv) Information provided in Table II-2, pg II-51, simply is analogous to stating "Since we do not know or have not been told that there is a problem, then there is no problem."

RESPONSE W-43.12

The reviewer has not provided sufficient information to definitively determine the nature of the specific question which is being raised. Based on a review of the reference to page II-51, it appears as though the reviewer is addressing the conclusion regarding local area air quality impacts presented under the Net Unavoidable Adverse Impacts column. The future ambient CO conditions upon which the conclusion that no adverse local area air quality impacts are based would be achieved under actions implemented by the SCAQMD or by the U.S. EPA should the SCAQMD fail to achieve the stated ambient CO conditions. Please refer to Response to Comment No. W-1.24 for additional information.

COMMENT W-43.13

v) Mitigation measures identified on page II-53 are irrelevant to the environmental impacts identified.

RESPONSE W-43.13

The mitigation measures presented on page II-53 address the impacts associated with fugitive dust and construction deliveries/off-site hauling which could occur during the construction phase of the First Phase project, as discussed on pages [sic] V.B.1-24 through V.B.1-26 of the First Phase Draft EIR.

The Summary Chart is structured such that discussions under each of the three column headings are continuous within each column and therefore the information presented in parallel columns may not line up exactly. Therefore, the mitigation measures identified on page II-53 would not necessarily be associated with the discussion of environmental impacts presented on this page.

COMMENT W-43.14

vi) Page II-53 and Table V.B.1-16 & 17 identify that some of the pollutant levels exceed ambient air quality standards by as much as a factor of 100 yet no relevant mitigation measures are offered nor indicate net adverse impacts.

RESPONSE W-43.14

The information presented in Tables V. B.1-16 and 17 relate to the post-construction cumulative regional air quality impacts of the Playa Vista project in conjunction with all related projects. The analysis omitted a conclusion regarding the significance of these cumulative regional air quality impacts, however, the information upon which this conclusion is based is presented in Table V.B.1-17. Correcting this omission, cumulative regional air quality impacts for all evaluated criteria pollutants are concluded to be significant since forecasted emission levels exceed the stated SCAQMD significance thresholds. Regarding this information, please see Section I of the Final EIR, Corrections and Additions to the Draft EIR, No. 5.m. Please see Section II, Corrections and Additions to the Draft Program EIR, No. 5.m.

The First Phase project constitutes approximately 10% of the total cumulative impacts identified in Table V.B.1-17. As described in Response to Comment No. W-43.11, the First Phase project is proposed inclusive of a comprehensive mitigation package to address the project's post-construction regional air quality impacts. For additional information regarding the First Phase project's mitigation package refer to pages II-49 through II-65, or pages V.B.1-49 through V.B.1-57, or the Playa Vista Air Quality Management Plan presented in Technical Appendix F-3, Volume VII.

COMMENT W-43.15

vii) Information provided on pages II-53 through II-56 does not offer any mitigation measures nor include any substance.

RESPONSE W-43.15

The reviewer suggests that pages II-53 to II-56 in the Draft EIR do not include any mitigation measures or any substance. Please refer to the above listed pages. The center column on each cited page lists specific recommended or code required mitigation measures to adequately mitigate environmental impacts described in the first column. For additional information please refer to Response to Comment No. W-43.13.

COMMENT W-43.16

viii) Page II-57 indicates inappropriate information.

RESPONSE W-43.16

The reviewer suggests that information provided on page II-57 of the Draft EIR is inappropriate, but does not state why this information might be inappropriate. The information provided on page II-57 describes post-construction air emission control measures for the Materials Recycling Facility (MRF). On the following pages, post-construction emission control measures for the Water Reclamation Facility (WRF) and Organic Recycling Facility (ORE) are described. All three facilities are elements of the First Phase project; and their impacts and mitigations were appropriately included in the Summary Chart.

COMMENT W-43.17

ix) Page II-66, some air quality issues are addressed, none of them have properly been quantified and none have adequate mitigation measures.

RESPONSE W-43.17

The page reference provided by the reviewer does not clearly correspond to either the First Phase or Master Plan EIRs. Page II-66 in the First Phase EIR does not address the air quality issue, while in the Master Plan EIR this references cites a page on which only air quality mitigation is provided. Given the comment offered it is not possible to logically respond.

COMMENT W-43.18

x) Noise issues have been generically identified. No actual project data is provided; furthermore, mitigation measures are irrelevant.



RESPONSE W-43.18

Section V.E. Noise of the First Phase and Master Plan EIRs and Technical Appendix K, Volume XI provide a substantial degree of quantification of potential project noise impacts during construction as well as following post-construction occupancy of the proposed project. In accordance with State CEQA Guidelines Section 15126, mitigation measures addressing potential significant project noise impacts have been identified. The reviewer's opinion that the proposed noise mitigation measures are irrelevant is acknowledged for the record.

COMMENT W-43.19

xi) Page II-78, this section should be done now not in the future as identified.

RESPONSE W-43.19

This comment refers to the section of the summary chart which discusses a local connector road to be provided between Hughes Way (Teale Street) and Hughes Terrace. The First Phase Draft EIR states that the applicant must either build the designated roadway or amend the District Plan to remove the requirement for the roadway. The reviewer is suggesting that this decision be made now, rather than in the future.

The reviewer's concerns are acknowledged and will be forwarded to the decision-makers. As noted on the Draft EIR (page V.G. 1-25), the applicant does not propose to build this road due to the impacts of its construction on the bluffs and the proposed riparian corridor. The determination regarding which of these two options will be implemented is one which will be made by the decision-makers in conjunction with project approval.

COMMENT W-43.20

The author of this EIR has misunderstood what an EIR is supposed to be. An EIR is not to be a collection of generic information, rather an analysis of the actual impacts a project has or may have on the environment, (both positive and negative impact analysis). All data analysis of adverse impacts have to be identified before a project proceeds, not afterwards.

RESPONSE W-43.20

It is unclear whether this comment refers to the Draft EIR for the First Phase project, the Draft Program EIR for the Master Plan project, or both. Dr. Glueck's comments on the adequacy and focus of the Draft EIR(s) are acknowledged and will be forwarded to decision-makers for consideration. However, as stated in Response to Comment No. W-43.1 above, these documents can hardly be fairly characterized as, "...a collection of generic information..." but are rather a comprehensive site specific compilation of existing and projected environmental conditions and impacts. The analysis and judgments presented in both documents reflect the best judgment of the City of Los Angeles specific to the First Phase and Master Plan projects, using accepted methodologies, and scientific and factual data. Consistent with the requirements of CEQA and

the State and City CEQA Guidelines, the Draft EIRs do present analyses of the actual impacts which the proposed project may have on the environment. Where significant impacts are identified, the document presents extensive and comprehensive mitigation programs to reduce or eliminate the identified impacts. A consistent format is used throughout the document which presents data and analysis regarding the Environmental Setting, Environmental Impacts, Mitigation Measures, Adverse Effects and Cumulative Impacts for 27 separate environmental topics in which the proposed project has the potential to have a significant effect on the environment.

COMMENT W-43.21

xii) Page II-85 Transportation and Circulation: Traffic section is totally inadequate since it does not even address the traffic problems, much less the mitigation measures.

RESPONSE W-43.21

As noted on page V.L.1-105, the cumulative regional effects of ambient growth in traffic and new traffic from development proposed in the project study area were incorporated into the transportation analysis. The analysis of cumulative regional traffic is described on pages V.L.1-20 to 28 of the Draft EIR. The cumulative analysis has been conducted on the basis of LADOT Policies and Procedures and meets the requirements of CEQA for adequacy. The First Phase project is shown to mitigate either directly or through system improvements all but one intersection impact in the City of Los Angeles.

COMMENT W-43.22

Page V.A-6, paragraph 4, states potential for an earthquake with a magnitude of 7.0 to 8.25 is possible yet the information in Table II-2 pg II-47, Sec.(d) states structures built here will withstand only effects of the earthquakes with a magnitude of 7.

RESPONSE W-43.22

The anticipated effects of earthquake shaking on structures is based on several factors including ground accelerations and duration of shaking. Maximum expected ground accelerations at the site are dependent on the Maximum Credible Earthquake (MCE) and distance between the site and the causative fault. The maximum credible earthquake constitutes the maximum earthquake that appears to be reasonably capable of occurring under the conditions of the presently known geological framework.

With respect to the site, as described in Section V.A of the Draft EIR, the most critical ground accelerations are associated with a possible magnitude 7.0 earthquake on the nearby active Newport-Inglewood fault zone and/or a magnitude 6.2 or 6.6 on the nearby potentially active Overland or Charnock faults, respectively; expected ground accelerations at the site associated with these possible earthquakes are greater than the expected ground acceleration associated with a magnitude 8.25 earthquake on the active and more distant San Andreas fault zone. Based on

the known tectonic regime, nothing greater than a magnitude 7.0 earthquake is expected to occur on the local faults in the area (Newport-Inglewood, Charnock, Overland, and Malibu Coast faults).

Therefore, the estimated site ground acceleration has been based on the most critical earthquake anticipated to affect the site.

#### COMMENT W-43.23

Page V.A.20 (3) Liquefaction Potential—all codes (UBC and Building and Safety) are based on magnitude of 7 not 8.2, therefore it should address proposed problems associated with 8.2 levels of earthquake rather than 7. Liquefaction can occur at lower levels of earthquake than what UBC and Building and Safety Codes allow. Building codes do not necessarily take into account catastrophic risk conditions. When preparing an EIR, one should consider such conditions.

#### RESPONSE W-43.23

The Uniform Building Code (UBC) and associated regulations provide minimum standards for use in building design to maintain public safety. As indicated in the UBC, structures should be designed to:

- Resist a minor level of earthquake ground motion without damage;
- Resist a moderate level of earthquake ground motion without structural damage, but possibly experience some nonstructural damage;
- Resist a major level of earthquake ground motion having an intensity equal to the strongest either experienced or forecast for the building site, without collapse, but possibly with some structural as well as nonstructural damage.

The UBC and related codes are based on the maximum expected ground accelerations at a site not a particular earthquake magnitude. The maximum ground accelerations anticipated at a site are dependent on the distance between the causative fault and the site, and the Maximum Credible Earthquake (MCE) for the causative fault. The MCE constitutes the maximum magnitude earthquake that appears capable of occurring under the conditions of the presently known geologic framework.

With respect to the site, the maximum anticipated ground accelerations are associated with magnitude 6.0 to magnitude 7.0 earthquakes on nearby faults (such as the Newport-Inglewood fault zone, the Charnock fault, the Overland fault or the Malibu Coast fault zone). Earthquakes of larger magnitude on more distant faults, such as the San Andreas fault zone, would produce lower associated ground accelerations at the site and are not as critical when designing structures.

The potential for liquefaction at the site depends on several factors including the soil type, particle size and gradation, water level, relative density, confining pressure, intensity of shaking and duration of shaking. Intensity of shaking and duration of shaking are functions of the maximum anticipated ground accelerations at the site. A state-of-the-art evaluation of liquefaction potential at the site was performed. The evaluation considers the maximum ground accelerations anticipated at the site.

Therefore, the most critical ground accelerations have been considered for building design with respect to liquefaction potential and ground shaking at the site.

COMMENT W-43.24

Page V.A.24 (3)—Mitigation Measures

This section does not address any of the following:

- a) schools affected by AB-3205.

RESPONSE W-43.24

Please refer to Response to Comment Nos. W-43.2, W-43.22 and W-43.23 regarding larger magnitude earthquakes.

COMMENT W-43.25

- b) Liquefaction problems beyond magnitude of 7 earthquakes.

RESPONSE W-43.25

Please refer to Response to Comment Nos. W-43.22 and W-43.23 regarding larger magnitude earthquakes.

COMMENT W-43.26

Page V.A.27 (5)—Cumulative Impacts

This section is contradictory in what it is saying. Just because the impacts were not quantifiable by the consultant, does not mean it is not significant.

RESPONSE W-43.26

As discussed on pages V.A-14, on-site grading and filling would be a balanced operation which would not entail the need for excavated materials to be removed from the site. Using standard industry practices for new construction, First Phase construction activities are estimated to produce approximately 23,000 cubic yards of construction debris over a five-year period, or

4,600 cubic yards per year. Types of debris would include: plaster, drywall, lumber, cardboard boxes, concrete spoil, paper, paint containers, insulation, fireproofing, and reinforcing steel. Densities of these wastes vary dramatically. Materials composed primarily of rubble can approach densities of 2,000 lbs/yd<sup>3</sup>. Conversely, materials containing large amounts of insulation or drywall can have densities as low as 250 lbs/yd<sup>3</sup>. Typical mixed solid wastes from construction and demolition activities have densities around 1,000 lbs/yd<sup>3</sup>.<sup>2</sup> Using a mixed material density factor of 1,000 lbs/yd<sup>3</sup> and the estimated landfill capacity data presented on page V.0.6-2 of the Draft EIR, the estimated 23,000 yd<sup>3</sup> of total First Phase construction and demolition debris (approximately 11,500 tons) could occupy approximately 0.0084% of the remaining landfill space in major Los Angeles County, landfills. Off-site hauling is projected to occur on weekdays and would be relatively constant during the course of construction. The cumulative impact referred to in the comment, disposal of construction soils and debris on regional landfills, is not considered to be significant due to the relatively small volume of construction material as compared to landfill capacity, and due to the relatively temporary nature of construction. In addition, in order to further reduce project solid waste impacts, the following recycling practices are recommended as mitigation measures:

Footnote 1 Mr. Robert Miller, Construction Manager, Maguire Thomas Partners, Memo, May 6, 1993, based upon estimates provided by construction contractors.

Footnote 2 Kathleen Ann Springer, Engineer, Camp Dresser & McKee, May 12, 1993 correspondence.

1. Implement a recycling program for demolition and construction debris. Waste materials to be collected and recycled include asphalt, concrete, roofing materials, porcelain plumbing, fixtures, ferrous and non-ferrous metals, wood, glass, brick, cardboard and other packaging materials.
2. Incorporate recycled materials into building design and construction where economically feasible and where compatible with design objectives. Recyclable materials would include drywall, steel, aluminum, ceramic tile, cellulose insulation and composite engineered wood products.

Please see Section I of the Final EIR, Corrections and Additions to the Draft EIR, Nos. 4.e, 4.f, 22.f, and 22.h. for further information. Please see Section II, Corrections and Additions to the Draft Program EIR, Nos. 4.e, 4.f, and 22.1 for further information. Please see Section III of the Final EIR, Corrections and Additions to the Draft EIR, No. 1.22.

#### COMMENT W-43.27

Page V.B.I—Table 4, most likely all allowable limits of emissions are exceeded significantly.

#### RESPONSE W-43.27

Table V.B.1-4 of the First Phase Draft EIR presents forecasts of construction vehicle exhaust emissions during periods of average and peak construction activity. This table and the text on

pages V.B.1-23 and 24 clearly indicate the circumstances under which the significance thresholds for each pollutant evaluated are exceeded. The reviewer's comment that most likely all allowable limits of emissions are exceeded significantly is acknowledged and will be forwarded to the decision-makers.

#### COMMENT W-43.28

In accordance with Table V.B.1-4, page V.B.1-21, practically all emission quantities generated exceed the significance threshold values. The statements made to the effect that these impacts are adverse but not significant is not a true statement because not only the threshold values are exceeded significantly, they also pose a significant adverse effect on the surrounding environment. [Reference: page V.B.1-32 last paragraph]

#### RESPONSE W-43.28

The reviewer is in error when stating that the emission quantities set forth in Table V.B.\_\_\_\_ [original damaged here] concluded to be adverse but not significant. Pages V.B.1-23 and 24 clearly indicate [original damaged here] circumstances under which the significance thresholds for each pollutant evaluated are exceeded. The reference cited to page V.B.1-32, last paragraph, firstly, reflects post-construction rather than the construction emissions identified within this comment and described within Table V.B.1-4, and secondly, the cited paragraph on page V.B. 1-32 concludes that post-construction regional emissions of sulfur oxides are adverse, but not significant because project emissions for this particular pollutant are below the SCAQMD's significance thresholds.

#### COMMENT W-43.29

Page V.C.2.A-16, and page V.D-16—These sections do not address mitigation measures nor the impacts of the project. It states if the project follows the L.A. County permit guidelines, it will have no adverse effects. This section does not identify any adverse effects and certainly no mitigation measures. This whole section has to be re-written to reflect the effects of the project not what it should do to get its permit(s). The major objective is lost as to how to determine environmental impacts.

#### RESPONSE W-43.29

The impacts of the project and associated mitigation measures with respect to groundwater and biotic resources are fully analyzed in Sections V.C.2.A and V.D, respectively. Mitigation Measure 3.c on page V.C.2.A-17 specifically refers to the potential impact on ground water of the proposed riparian corridor and freshwater marsh. The monitoring program recommended in conjunction with this freshwater system is described in an added Appendix to this document, Appendix \_\_\_\_\_. While adverse effects on ground water are not anticipated (see pages V.C.2.A-13 through V.C.2.A-14 of the First Phase Draft EIR), the "corrective measures" referred to in Mitigation Measure 3.c on page V.C.2.A-17 would consist of sediment removal in the freshwater

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marsh system performed in accordance with the findings of the monitoring program and in coordination with the permitting agencies listed in that Mitigation Measure 3.c.

COMMENT W-43.30

Page V.C.2.A-17—Section 5 entitled Cumulative Effects is totally irrational. The conclusion reached as to the positive cumulative impact has poor logical and scientific reasoning.

RESPONSE W-43.30

The indicated positive cumulative impact is a result of performing the groundwater remediation. If the remediation was not performed, the contaminant plume would eventually migrate to off-site areas, exacerbating existing groundwater contamination that has occurred at other off-site locations.

**Response 35-31**

This attachment provides comments and responses from the Final EIR for the First Phase Project. Six of the 17 lawsuits filed against the First Phase Project concern CEQA compliance. None of these challenges has succeeded. Most recently, on February 10, 2004, the Honorable George Wu denied a petition for writ of mandate brought by the commentor, among others, which requested a Subsequent EIR for the First Phase Project based on the discovery of methane gas and the classification of the First Phase Project site as a liquefaction zone, among other things. See *Environmentalism Through Inspiration and Non-violent Action, et al. v. the City of Los Angeles, et al.*, Los Angeles Superior Court Case No. BS070757.

**LETTER NO. 36**

Heal the Bay  
3220 Nebraska Avenue  
Santa Monica, CA 90404

December 22, 2003

**Comment 36-1**

Heal the Bay is a nonprofit environmental organization with over 10,000 members dedicated to making the waters of Southern California clean and healthy for marine life and people. Heal the Bay has actively worked to improve water quality in Ballona Creek and Ballona Estuary for over 15 years. We commented extensively on natural resources and water quality impacts as well as mitigation activities of the Phase I Playa Vista Development. To date, some Phase I mitigation measures have yet to be implemented; most notably the water reclamation requirement for Playa Vista. Currently, Heal the Bay is the sole environmental group on the Los Angeles Contaminated Sediments Task Force that is working to develop solutions to the contaminated sediment problem located at the terminus of the Ballona Creek. We are currently working with the City and County of Los Angeles on a State-funded project to develop a comprehensive structural BMP implementation blueprint for the Ballona Creek Watershed.

Additionally, Heal the Bay has played an influential role in the development of local and regional stormwater regulations. We were party to legal action that resulted in the TMDL consent decree that schedules completion of the TMDLs for Los Angeles and Ventura Counties. Heal the Bay was one of the key stakeholders in the development and negotiations of the Los Angeles County NPDES Municipal Stormwater permit and we played an instrumental role in the development and adoption of the SUSMP requirements of the permit.

**Response 36-1**

The comment provides background information about the commentor. Specific comments regarding the review of the Draft EIR and responses follow.

**Comment 36-2**

Based on our review of the EIR, the biotic resources and water quality impact analyses are incomplete and inadequate in several key areas. It is not clear what the true nature of the riparian corridor will be. The EIR lists the riparian corridor as a replacement for lost open space, yet proceeds to state measures how maintenance activities will keep the area clear for flood control. The EIR places a great deal of emphasis on the “enhanced” habitat value of the riparian corridor. However, very little detail is provided to the ecological nature of the riparian corridor making it impossible to assess the impact or benefit of the project.



**Response 36-2**

One purpose of the Riparian Corridor is to enhance habitat values over existing conditions, as it will be constructed in an area where existing uses include 6.5 acres of paved areas, buildings, parking lots and culverts, and 0.2 acres of the Centinela Ditch. Subsection 3.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 545 states: “construction of the Project’s Riparian Corridor would replace 6.7 acres of pavement, structures, and storm drain (0.2 acre of Centinela Ditch) with native riparian habitat and native grassland.” As stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor is expected to have a beneficial effect by establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists. A second purpose of the Riparian Corridor, indicated by Subsection 3.4.1.2.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 385, is to “provide an appropriate level of on-site flood protection, detention and drainage.” A third purpose, indicated by Subsection 2.1.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 410, is to “improve the quality of urban runoff entering the Ballona Wetlands and Santa Monica Bay, reducing existing water quality impacts to the area and aiding in the national program for improvement of water quality from urban runoff.”

The ecological nature of the Riparian Corridor is specified in great detail in the three volume Habitat Mitigation and Monitoring Plan (HMMP), which is available in the reference library for the Draft EIR, and was discussed in Subsection 2.1.1.4 on page 410 of Section IV.C.(2), Water Quality, of the Draft EIR. The HMMP was developed to describe the landscaping requirements, design features, and habitat goals necessary to establish and maintain the Freshwater Wetlands System (including the Riparian Corridor). The HMMP was approved by the Army Corps of Engineers and the California Department of Fish and Game, and contains Performance Criteria that the Riparian Corridor must meet including criteria related to number and variety of bird species as well as types of vegetation.

In addition, the comment appears to raise concerns about the original permit decisions, construction goals and objectives of the Freshwater Wetlands System (inclusive of the Riparian Corridor and the Freshwater Marsh). The development of the Freshwater Wetlands System was required as the result of a court-approved settlement reached between the Applicant’s predecessor-in-interest, the Friends of Ballona Wetlands, and the City, among others, in 1994. (*Friends of Ballona Wetlands v. California Coastal Commission, et al.*, No. C 525 826 (Los Angeles Sup. Ct., stipulation filed June 9, 1994).) A state court upheld the propriety of using that settlement as a basis for design of the Freshwater Wetlands System. (*Save Ballona Wetlands v. City of Los Angeles, et al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994).) The parties agreed to a reduced Playa Vista project plan (including the Proposed Project), as well as construction of the 52-acre Freshwater Wetlands System to accommodate the storm water drainage of areas tributary to it. The parties to the settlement agreed that one of the key purposes of the Freshwater Wetlands System was to cleanse storm water from Area D of the Playa Vista Project (the Proposed Project and the First Phase Project) as well as off-site tributary areas (i.e., along Jefferson Boulevard and on the top of the Westchester Bluffs) before it emptied into adjacent waters.

The entire Freshwater Wetlands System, including the Freshwater Marsh and the entire Riparian Corridor, was studied as part of the Draft EIR for the First Phase Project (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510 (certified by the City of Los Angeles in Sept. 1993). (See Section IV.C.(1), Hydrology, and Section IV.C.(2), Surface Water, of the Draft EIR for the First Phase Project on pages IV.C.1-7 to 1-12 and IV.C.2.B-19 to B-30, respectively.) In addition, the Draft Program EIR for the Master Plan Project, which included development of Areas A, B, C, and D of the Playa Vista Planning Area, was circulated by the City in 1992 as an informational document to disclose cumulative impacts (along with the Draft EIR for the First Phase Project). The Draft Program EIR for the Master Plan Project also discussed the entire Freshwater Wetlands System. (See Section IV.C.(1), Hydrology, and Section IV.C.(2).B, Surface Water, of the Draft Program EIR for the Master Plan Project on pages IV.C.1-17 to 1-23 and IV.C.2.B-27 to B-31, respectively.)

The City's decision to plan for a subsequent phase of Playa Vista in addition to the construction of the First Phase Project has been upheld by the courts. (See *Save Ballona Wetlands v. City of Los Angeles, et al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994) (1994 SBW Decision).) Although the City's approval for the construction of the middle segment of the Riparian Corridor adjacent to the Village area is requested as part of the current review process, the Army Corps of Engineers, the California Department of Fish and Game, and the Regional Water Quality Control Board, Los Angeles Region (RWQCB), have approved the entire Freshwater Wetlands System, including the Riparian Corridor. The California Coastal Commission has approved and issued permits for those portions of the Freshwater Wetlands System within the coastal zone. Further, these approvals have been upheld by the courts. (See *Wetlands Action Network v. United States Army Corps of Engineers, et al.*, 222 F.3d 1105 (9th Cir. 2000) (2000 WAN Decision), cert. denied, 534 U.S. 815 (2001) (challenge to the Army Corps of Engineers Section 404 permit); *Save Ballona Wetlands v. City of Los Angeles, et al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994) (challenge to the City's EIR for the First Phase Project); *Earth Trust Foundation, et. al v. City of Los Angeles, et al.*, No. SS006405 (Los Angeles Sup. Ct., decision filed August 18, 1996), affd. No. B106408 (Ct. App. 2nd App. Dist., decision filed May 15, 1997) (challenge to the City's Addendum to the EIR for the First Phase Project).)

Since issuance of the 404 Permit in 1992, the overall development, including the Proposed Project, has been scaled down significantly. In light of the lesser development currently planned with the sale of Area A and part of Area B to the State in December 2003, the Army Corps determined in 2003 that the Riparian Corridor and the pre-treatment areas of the Freshwater Marsh were not necessary for mitigation. Further, the Corps clarified there was "no need for the 51.1-acre freshwater wetland system to be subject to numerical water quality standards as waters of the United States." (July 18, 2003, Letter from U.S. Army Corps of Engineers, Note 111, Section 3, Subsection 3.2.3.1, page 3-30, of Appendix F-1, included as an Appendix to the Final EIR.)

Also, resulting from the sale of portions of Area B to the State of California in December 2003, as well as the increase in parks in the area of the Proposed Project as compared with that

originally envisioned for the Playa Vista Second Phase Project in the original Playa Vista Master Plan, the expected total loads of pollutants entering the Freshwater Wetlands System will be reduced. The expected and analyzed loads as set forth in the previously approved First Phase EIR from the area of the Proposed Project would be lower than those estimated and approved previously by federal, state, and local agencies.

### **Comment 36-3**

A great deal of emphasis is given to the existing water quality in the Freshwater Marsh and the ability of the marsh to effectively treat wet and dry runoff. However, actual monitoring has not been established (or if it has, the results were not presented), so assessing the proposed projects impacts on the Marsh and its ability to provide treatment to the project's runoff is not possible.

### **Response 36-3**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The Freshwater Wetlands System is under construction. A portion of the Freshwater Marsh has been constructed and an additional 8 acres is still pending construction. In addition, construction commenced in 2003 on the western third of the Riparian Corridor portion of the Freshwater Wetlands System. To the extent vegetation has been planted in the Freshwater Marsh, that vegetation is still in the process of growth and maturation, both of which are part of the Freshwater Wetlands System design to improve water quality performance. Accordingly, the Freshwater Wetlands System is not yet fully operational.

Actual water quality monitoring data from within the constructed portion of the Freshwater Marsh was presented in the Draft EIR. See Subsection 2.2.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 430; Table 38 and text in Subsection 3.4.1.2.3 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 431 and 472, respectively. Table 38 of the Draft EIR on page 431, as well as Table 3-15 of Appendix F-1 of the Draft EIR on page 3-152, provides a summary of monitoring data in the Freshwater Marsh from three sampling events. The Freshwater Wetlands System water quality monitoring program is set forth in the Freshwater Wetlands System: Operations, Maintenance and Monitoring Manual (Appendix F-2 of the Draft EIR), and monitoring was commenced in March 2003. As per the requirements of that manual (discussed on pages 503 through 505 of Subsection 3.4.1.2.8 of Section IV.C.(2), Water Quality, of the Draft EIR), monitoring is conducted and reports provided to the relevant public agencies, including the U.S. Army Corps of Engineers, the California Coastal Commission, the California Department of Fish and Game, RWQCB, and the City of Los Angeles.

Section IV.C.(2), Water Quality, of the Draft EIR assesses the potential impacts of the Proposed Project on the Freshwater Marsh and the ability of the Freshwater Marsh to provide treatment for

runoff from the Proposed Project. Future conditions in the Freshwater Marsh during dry weather were assessed based on the monitoring data discussed in the preceding paragraph. As stated in Subsection 3.4.1.2.3 on page 473: “While [available dry weather data] are not completely representative of the dry-weather runoff from the First Phase and Proposed Project areas, they do represent at least a portion of the ambient, perennial flows that will be supplying the Freshwater Marsh with a continual source of fresh water....”

Wet weather conditions in the Freshwater Marsh after completion of the Proposed Project were assessed using a computer model, as well as qualitative assessments. Modeling to assess pre-development and post-development pollutant loads as well as BMP performance is a standard and accepted approach for assessing potential impacts from stormwater. (See [www.epa.gov/waterscience/wqm](http://www.epa.gov/waterscience/wqm)). This item is located in the reference library for the Final EIR. The model used in this case uses standard approaches that produce reliable results. (See Subsection 3.2.4.3.1, on page 3-55 of Section 3, Water Quality of the Water Resources Technical Report (Appendix F-1 of the Draft EIR.)) The model utilizes empirical information about pollutant loads that can be anticipated from the land uses planned for the Proposed Project, and the ability of BMPs to remove pollution from stormwater. The pollutant loading data were derived from the County of Los Angeles’ 1994-2000 stormwater monitoring data (Section IV.C.(2), Subsection 3.2.4.3.1 of the Draft EIR), and the BMP-performance data were derived from the peer-reviewed National Stormwater BMP Database for BMPs most relevant to those planned for the Proposed Project. (Data are provided in Table F-6 of SubAppendix F of Appendix F-1 of the Draft EIR.) These two data sets are among the most extensive stormwater quality and BMP performance data sets available. A complete description of the model methodology is described in Section 3 of the Water Resources Technical Report (Appendix F-1 of the Draft EIR).

The modeling analysis is one of several assessment methods used in the Draft EIR. The Draft EIR also includes a qualitative assessment of impacts, including the evaluation of construction impacts, dry-weather flows, and compliance with narrative standards in the Regional Board’s Basin Plan and relevant permits. (Section IV.C.(2), Subsection 3.4.1.1 (Construction Impacts), Subsection 3.4.1.2.1 (Municipal Stormwater NPDES Permit), Subsection 3.4.1.2.2 (Basin Plan Water Quality Objectives), and Subsection 3.4.1.2.3 (Assessment of Dry-Weather Flows) of the Draft EIR.) This qualitative assessment includes narrative discussion supported by information from the literature, addressing both modeled and unmodeled potential constituents of concern (See Section IV.C.(2), Subsection 3.4.1.2 of the Draft EIR).

Through the qualitative and quantitative assessment provided in the Draft EIR (which includes assessments of the ability to treat runoff from the Proposed Project), the potential impacts from the Proposed Project were assessed and were concluded to be less than significant (Subsection 3.4.1.2.9 of Section IV.C.(2), Water Quality, of the Draft EIR).

#### **Comment 36-4**

Additionally, analysis of impacts from the stormwater runoff from the proposed project is incomplete, particularly because loadings of several pollutants that accumulate in sediment, including PAHs and pesticides were not estimated and impacts were not adequately analyzed.

These pollutants are of particular concern because Ballona Creek Estuary is already impaired due to excessive levels of these pollutants in the sediment as well as for sediment toxicity. Any additional loading from the proposed project beyond the First Phase development will exacerbate already degraded conditions, may be illegal and should not occur. Related to this concern, we believe the stormwater modeling may have significantly underestimated loadings of lead and zinc because the model apparently did not account for the substantial increase in traffic that will occur on existing roads because of the proposed project.

#### **Response 36-4**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The Ballona Creek Estuary is impaired with chlordane and DDT, pesticides that were banned from use several decades ago and which will not be used at the Proposed Project. The Proposed Project will not be a source of chlordane and/or DDT and will not exacerbate already-degraded conditions in the Ballona Estuary with respect to these compounds.

The Ballona Creek Estuary is impaired with respect to PAHs, a family of compounds commonly associated with hydrocarbons and their use, such as in internal combustion machines. Los Angeles County sampling for PAHs does not indicate that residential development, which is the predominant land use with the Proposed Project, is a significant source of PAHs ([http://ladpw.org/wmd/NPDES/wq\\_data.cfm](http://ladpw.org/wmd/NPDES/wq_data.cfm)). This item is located in the reference library for the Final EIR. Out of 75 analyses for PAHs conducted for runoff from residential property, 61 of the analyses did not detect anything, with a method detection limit of 0.1 parts per billion, or lower. Of the four PAHs detected, all mean values were below one part per billion and all detects, alone or in combination, were well below 300 parts per billion, the lowest observable effect level (LOEL) for PAHs reported in the National Oceanic and Atmospheric Administration (NOAA) Screening Quick Reference Tables (<http://response.restoration.noaa.gov/cpr/sediment/squirt/squirt.pdf>). Moreover, the BMPs included in the Proposed Project should effectively preclude PAHs from reaching the Ballona Creek Estuary. PAHs tend to associate with particles, and the BMPs at the Proposed Project will be effective at removing suspended particles in runoff. In addition, the extensive underground parking planned for the Proposed Project will help to reduce the potential for runoff to intercept any PAHs that may occur at the Proposed Project. Other BMPs that will reduce potential impacts from PAHs include: public education (regarding proper disposal of petroleum products), street sweeping, and the clean fuel internal transit system. (See Subsection 3.4.1.2.2, page 467 of Section IV.C.(2), Water Quality of the Draft EIR, and Subsection 3.2.4.6.2.4, page 3-96 of Section 3 of the Water Resources Technical Report (Appendix F-1).)

To the extent that any PAHs escape in runoff from the Proposed Project to the Ballona Creek Estuary, such releases will be minimal. Any insignificant levels of PAHs from the Proposed Project are not expected to cause or contribute to existing impairment, or otherwise exacerbate

already-degraded conditions. The issue of the “legality” of any PAHs is not an environmental issue. However, it should be noted that the State Water Board recognizes that even new loads of impairing pollutants to impaired water bodies are not illegal *per se*, and that it cannot be assumed, as the commentor assumes, that a water body has no capacity to assimilate even insignificant new loadings. (See e.g., *In the Matter of the Review on its Own Motion of Waste Discharge Requirements for the Avon Refinery*, Order WQ 2001-06, located in the reference library for the Final EIR, (finding that even if a waterbody is impaired a Regional Water Board cannot assume there is no remaining capacity to assimilate more of the impairing pollutant, overturning a permit limit of zero for a new discharge of the impairing pollutant).)

The Proposed Project will not be a new source of PCBs—another long-banned compound. PCBs were detected slightly above guideline levels in a sample collected from the Centinela Ditch in 2001. Under the Proposed Project, however, historical sediments in the Centinela Ditch would be removed under the oversight of the RWQCB, and the Centinela Ditch would be replaced by the Riparian Corridor. (Subsection 2.2.3.2.3 on page 699 of Section IV.I, Safety/Risk of Upset of the Draft EIR and Subsection 3.2.4.6.2.4, page 3-95 to 3-96, of Section 3 in the Water Resources Technical Report (Appendix F-1 of the Draft EIR).)

Discharge of the pollutants deemed by the regulatory agencies to be causing sediment toxicity in the Ballona Creek Estuary (e.g., PCBs, and historical pesticides (DDT, chlordane, Chema, and dieldrin)) are not expected at levels of concern from the Proposed Project because they are no longer in use. The Proposed Project will not be a source of any non-negligible amounts, and even if they might be used in contravention of current requirements, the BMPs employed as part of the First Phase Project and Proposed Project will remove such constituents. (Subsection 3.2.4.6.2.4, page 3-101, of Section 3 in the Water Resources Technical Report (Appendix F-1 of the Draft EIR).)

The model used in Section IV.C.(2), Water Quality, of the Draft EIR did not “significantly underestimate loadings of lead and zinc,” as the commentor suggests. It was assumed for purposes of modeling that lead and zinc loads will be within the range of lead and zinc concentrations and loads detected in the regional sampling and analysis conducted by Los Angeles County, which monitoring reflects the range of traffic conditions within the Los Angeles region. Traffic at the Proposed Project is anticipated to be within this range and may even be at the lower end of the range given the various traffic improvements that are planned for the Proposed Project. Such traffic improvements will facilitate the movement of vehicles through the Proposed Project area, reducing the opportunity for vehicles to release lead and zinc within this area. In addition, the significant BMPs at the Proposed Project, including below ground parking, will reduce the discharge of auto-related pollutants.

Major roads in proximity to the Freshwater Marsh consist of Lincoln Boulevard, Jefferson Boulevard, and Culver Boulevard. Based on the traffic volumes projected in the traffic study for the Draft EIR for these roadways in the area surrounding the Marsh, the Proposed Project is anticipated to result in increased average daily trips (ADT) of 1.5 percent. As a result, the Proposed Project is not anticipated to substantially contribute to automobile-related pollutant loadings in the area. See also Response 36-29 and Response 36-30, below.

**Comment 36-5**

Finally, the project's impact on bacteria densities in the Ballona Creek Estuary and nearby Santa Monica Bay beaches was not adequately assessed even though Ballona Creek Estuary and the beaches are already impaired by excessive levels of bacteria.

Our comments, questions, and concerns are summarized below by EIR topic.

**Response 36-5**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The Proposed Project includes numerous BMPs for controlling bacteria, which collectively will reduce the potential impact of bacteria from the Proposed Project to a level of insignificance. These BMPs include source controls such as public education (including education on pet waste control), street sweeping, covered trash receptacles, and new sewer systems (reducing human sources of bacteria to essentially zero), which reduce the amount of bacteria present at the Proposed Project available to come into contact with runoff. In addition, bacteria in runoff at the Proposed Project will be subject to various treatment controls. Bacteria attached to particulates and solids suspended in runoff will be reduced through filtration controls such as catch basin inserts, and the Freshwater Wetlands System itself. Solar degradation of bacteria within the Freshwater Wetlands System, including most importantly its shallower areas, also will reduce bacteria in runoff.

Qualitative assessment of bacteria in runoff from the Proposed Project is discussed in the Draft EIR in Subsection 3.4.1.2.3, Subsection 3.4.1.2.4, Subsection 3.4.1.2.5, and Subsection 3.4.1.2.6 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 472, 476, 478, and 484, respectively and Subsection 3.2.4.6.2.4 page 3-97 through 3-98, of Section 3 of the Water Resources Technical Report (Appendix F-1 of the Draft EIR).

Available dry weather data was utilized to assess the potential impacts of bacteria during dry weather. As shown in Table 3-15, the maximum most probable number of bacteria per 100 milliliters of water (MPN/100 ml) was 42 MPN/100 ml and 23 MPN/100 ml respectively for fecal and total coliforms (common indicator bacteria). These concentrations are well below the Basin Plan requirements for fecal coliforms and total coliforms, which are 200 MPN/100 ml and 10,000 MPN/100 ml respectively. These results are consistent with the ability of solar radiation to destroy bacteria. Long residence times and significant open water areas of the Freshwater Wetland System provide opportunity for sunlight to destroy bacteria during dry weather. (See T.S. Schueler, "Microbes and Urban Watersheds: Ways to Kill 'Em," in The Practice of

Watershed Protection (T.R. Schueler, et al. eds., 2000).) This item is located in the reference library for the Final EIR.

A system larger but similar to the Freshwater Wetlands System can be used to illustrate the destruction of bacteria by sunlight during dry weather. The San Joaquin Marsh in Orange County is operated actively via the creation and maintenance of mud flat areas to attract shore-birds, a potential source of bacteria. In contrast, the Freshwater Marsh does not have active management to maximize shore-bird habitat. Data from the last two years show that bacteria levels in the San Joaquin Marsh are reduced by about 50 percent during dry weather. These data presented in Table 36-5, indicate that the average effluent from the San Joaquin Marsh is below the 200 MPN/100 ml 30-day average and below the 400 MPN/100 ml instantaneous maximum.

**Table 36-5**

**DRY WEATHER FECAL COLIFORM CONCENTRATIONS AT THE  
SAN JOAQUIN CONSTRUCTED WETLANDS**

	<b>Influent Set 1</b>	<b>Effluent Set 1</b>	<b>Avg. Log Order Removal Set 1</b>	<b>Influent Set 2</b>	<b>Effluent Set 2</b>	<b>Avg. Log Order Removal Set 2</b>
Date of First Sample	01/04/99	01/04/99		08/05/02	08/15/02	
Date of Last Sample	06/01/99	06/01/99		10/19/03	10/29/03	
Number of Samples	22	22		25	25	
Number of Samples > MDL	22	17		25	25	
Average concentration* (MPN/100 mL)	4,592	56	1.6	328	179	0.3

*\*Used MDL for values reported below MDL.*

There is no scientific evidence to support the assertion that bacteria from the Proposed Project during dry weather will cause or contribute to existing impairment in the Ballona Channel Estuary or Santa Monica Bay. In fact, as indicated in the Draft EIR on page 472, Subsection 3.4.1.2.3 of Section IV.C.(2), Water Quality, the scientific evidence is to the contrary.

Available wet-weather data indicate that wet ponds can be effective at removing bacteria from storm water. Please see Response 36-28, below, regarding the removal in wet ponds of approximately 90 percent of bacteria during storm events.

New loads of bacteria from the Proposed Project, if any, are expected to be minimal due to the implementation of the bacteria-related BMPs as discussed in the Draft EIR at Subsections 3.4.1.2.3, 3.4.1.2.4, 3.4.1.2.5, and 3.4.1.2.6, of Section IV.C.(2), Water Quality. Any insignificant levels of bacteria from the Proposed Project are not expected to cause or contribute to existing impairment, or otherwise exacerbate already-degraded conditions.



**Comment 36-6**

## General

1. Heal the Bay is extremely concerned about the lack of dates associated with mitigation commitments.

There were [*sic*] a number of mitigation requirements in Phase I that have yet to be completed, even though the project is nearing completion and the EIR was approved over a decade ago. For example, there is still no reclaimed water use at Playa Vista. Although the West Basin Municipal Water District has yet to complete construction of their reclaimed water distribution system in the region, PV should still be held accountable for implementing a reclaimed water program on-site as soon as the water is available. Currently, PV is using only potable water for toilet flushing and irrigation and they are contributing to the pollutant loads from [t]he Hyperion Treatment Plant to the Santa Monica Bay. These impacts have yet to be mitigated for Phase I, let alone an assessment for Phase II. Please include an implementation schedule for the mitigation measure and an assessment of the beneficial impacts of water reuse on project impacts.

**Response 36-6**

Mitigation measures for the First Phase Project are being implemented in accordance with the Playa Vista First Phase Project Mitigation Monitoring and Reporting Program adopted in connection with the certification of the First Phase EIR.

Reclaimed water is not yet available at the Playa Vista property. However, the entire First Phase Project, as well as the Proposed Project, have been constructed to use reclaimed water when available. As discussed in Subsection 2.2.2 on page 1082, of Section IV.N.(1), Water Consumption of the Draft EIR, the Los Angeles Department of Water and Power (LADWP) has committed to supplying the Proposed Project and adjacent Playa Vista First Phase Project with reclaimed water, which would be delivered through an agreement with the West Basin Municipal Water District (WBMWD) from its West Basin Water Recycling Plant (WBWRP). Before WBWRP can supply reclaimed water to the Playa Vista site (including the existing Playa Vista First Phase Project, and ultimately the Proposed Project), an extension of the WBWRP service line that currently serves the Westchester Golf Course to the WBWRP service lines must be constructed, as part of LADWP's Westside Water Recycling Project. In order to reduce traffic impacts, construction of the pipeline extension is scheduled to occur concurrent with the widening of Lincoln Boulevard by CalTrans which is expected to commence by the fall of 2004. Upon completion of the construction, the reclaimed water lines along Lincoln Boulevard would be connected to the Proposed Project's (and adjacent Playa Vista First Phase Project's) reclaimed water distribution system to supply landscaping irrigation and office uses. The timing of the construction of the reclaimed water service line and Lincoln Boulevard widening project is anticipated to be completed well before the Proposed Project buildout.

In response to the commentor's request that the Applicant be held accountable for implementing a reclaimed water program as soon as the water is available, Section IV.N.(1), Water

Consumption, of the Draft EIR identifies on page 1096 a mitigation measure to that effect. As far as the benefits of water reuse, the substitution of reclaimed water for potable in landscaping irrigation and office uses would reduce the consumption of approximately 0.064 million gallons per day of potable water, thereby proportionately reducing the overall demand on LADWP's potable water supplies.

The commentator is correct that the Proposed Project will discharge into a sanitary sewer system that delivers wastewater into the City of Los Angeles' Hyperion Treatment Plant for treatment prior to lawful discharge to Santa Monica Bay through an underwater submerged diffuser. The flows from the Proposed Project to be routed to the Hyperion Treatment Plant consist of routine wastewater for which the Hyperion Plant has the appropriate wastewater technology and adequate capacity. Section IV.N(2) of the Draft EIR provides that the Proposed Project may have a significant impact on wastewater treatment facilities, however, under the City's Sewer Allocation Ordinance, the City will not issue a sewer connection permit unless the City determines that there is adequate capacity. This ordinance was adopted in 1990 and is in place to allocate sewer permits consistent with sewer capacity. As a result, no permits for sewer connections will be issued unless the capacity exists.

### **Comment 36-7**

We strongly urge that the EIR include a list of mitigation requirements for Phase II with a timeframe for completion of the mitigation measures. In addition, please provide a similar table for the outstanding mitigation measures (water reuse, household hazardous waste drop-off facility, other solid waste handling and recycling requirements, etc) included in the Phase I EIR.

### **Response 36-7**

The mitigation monitoring and reporting program (MMRP) for the Proposed Project is included in the Draft EIR as Appendix C. Mitigation measures for the Proposed Project will be completed in compliance with the MMRP. This MMRP lists the mitigation measures for the Proposed Project along with the enforcing agencies, monitoring agency, monitoring frequency, and other mitigation measure specifics. In general, the mitigation measures are identified as falling into the following phases of development: pre-construction, construction, and post-construction. Directly related to these phases are implementation mechanisms that will provide a timeframe in which the mitigation measures will be completed. For example, incorporation of mitigation measures into subdivision conditions, Project design, construction contracts, and administrative actions. Please Refer to Subsection 1.3 of Appendix C of the Draft EIR on page 3, for further details on the monitoring procedures.

Mitigation measures for the First Phase Project are being implemented in accordance with the MMRP for the First Phase Project. The First Phase Project has implemented hazardous waste drop off, solid waste recycling and other measures, as required by the MMRP. These mitigation measures are being monitored under the Playa Vista First Phase MMRP.

**Comment 36-8**

One example that we must point out is the impacts of SB 666 on traffic mitigation in the area. Heal the Bay worked closely with PV and Senator Debra Bowen on SB 666 because we were concerned about the impacts of an extension of PV Drive on potential habitat restoration of Area C. As such, SB 666 was written and signed into law. The problem with the law was that it did not require PV to make up for the lost Phase I traffic mitigation elsewhere in the project. PV has explained away the required Phase I mitigation by stating that the mitigation is no longer needed because the project has been downsized. Heal the Bay believes that this explanation is disingenuous and goes against the spirit of cooperation that allowed the controversial SB 666 to be signed into law. PV needs to keep their end of the SB 666 bargain by providing additional traffic mitigation equivalent to that required under Phase I with the PV Drive road extension. PV received \$139 million for the sale of Area A and part of Area B, so they have the resources to provide the additional traffic mitigation they committed to as part of the SB 666 process. As part of this commitment, PV agreed to adequately address the issue as part of the Phase II EIR and they have failed to do so.

**Response 36-8**

As a result of the State's acquisition of Area A and portions of Area B and the passage of SB 666, the Playa Vista Drive bridge and road extension to Culver Boulevard will not be constructed and is no longer a part of the baseline conditions for the year 2010. As discussed in Subsections 3.1 and 5.1.5 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 828 and 931, respectively, the Traffic Report included an analysis of the Proposed Project's impacts under the no Playa Vista Drive bridge and road baseline. Under either baseline scenario (i.e., with or without Playa Vista Drive bridge and road), the analysis of traffic intersection impacts is the same.

In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

**Comment 36-9****Biological Resources**

2. It is incompatible for the riparian corridor to function as a high quality habitat area and serve as flood control for the Urban Development Component of Phase II.

The Biotic Resources section of the EIR states that the riparian corridor, in addition to the freshwater marsh, was used as mitigation for the filling of wetlands on the project site. The EIR states that the habitat created by the construction of the riparian corridor would establish “higher quality, more diverse breeding and foraging habitat than presently occurs on-site” (page 542). According to the EIR, unavoidable adverse impacts inclusive of the substantial loss of undeveloped area associated with this project (60.9 acres), impacts to raptor foraging area, and short-term loss of marginal nesting habitat for common migrant birds would be unlikely to affect the long-term survival of the species due to the restoration components of the Project. The EIR concludes that the impacts to biological resources would be less than significant due in part to the creation of the riparian corridor (10.2 acres) which would supply “better quality, more diverse native habitat than presently occurs” (page 552).

### **Response 36-9**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The prior approvals for the Freshwater Wetlands System, including the Riparian Corridor, recognize the multi-purpose functions of the Freshwater Wetlands System—namely, habitat, flood control, and water quality. (See Subsection 2.1.1.4 on page 410 of Section IV.C.(2), Water Quality, of the Draft EIR.) The approving agencies (including the Army Corps of Engineers, California Department of Fish and Game, and the Regional Water Quality Control Board) have determined that the Riparian Corridor can function simultaneously as a high quality habitat area and as a flood control facility. While the commentor asserts the incompatibility of these two functions, the commentor offers no evidence of such incompatibility. In fact, it is important that the Riparian Corridor serve both of these functions. For example, if the Riparian Corridor did not have enough capacity to manage flood water volumes, such flood waters could damage the habitat to be established there. The Regional Water Quality Control Board recognizes the importance of both of these functions, stating that local governments are to minimize damage in emergency situations, such as flooding, and are to ensure control of post-development stormwater peak flows to protect habitat. (See Los Angeles Public Storm Drain Permit Sections D.1 and F.9 ([www.swrcb.ca.gov/~rwqcb4/html/programs/stormwater/la\\_ms4\\_final/FinalPermit.pdf](http://www.swrcb.ca.gov/~rwqcb4/html/programs/stormwater/la_ms4_final/FinalPermit.pdf)) located in the reference library for the Final EIR.)

The Riparian Corridor and the Freshwater Marsh were designed to be used as mitigation for the fill of wetlands in the original Playa Vista Master Plan development area (Areas A, B, and C as well as Area D). In the 404 Permit issued in 1992 for the Freshwater Wetlands System including the Riparian Corridor, the Army Corps of Engineers recognized that the Freshwater Wetlands System provided more than enough mitigation for the fill of wetlands at the Playa Vista Development that was contemplated at that time. (404 Permit, Special Condition 1.) This item is located in the reference library for the Final EIR. However, since issuance of the 404 Permit, the overall development including the Proposed Project has been scaled down significantly. In light of the lesser

development currently planned, in 2003, the Army Corps determined that the Riparian Corridor and the pre-treatment areas of the Freshwater Marsh were not necessary for mitigation. Further, the Army Corps clarified that there was “no need for the 51.1-acre freshwater wetland system to be subject to numerical water quality standards as waters of the United States.” (July 18, 2003, Letter from U.S. Army Corps of Engineers, Note 111, Section 3, Subsection 3.2.3.1, page 3-30, of Appendix F-1 of the Draft EIR, which has been included as an Appendix to the Final EIR.)

### **Comment 36-10**

Contrasting the above stated uses of the riparian corridor is the stated use of the riparian corridor in the Hydrology section of the EIR to serve as flood control for the Urban Development Component of the Proposed Project. As stated in the Hydrology section of the EIR, the “Riparian Corridor has been designed to serve the Proposed Project by conveying increases in peak runoff rates or volumes caused by construction of the Urban Development Component and provide an appropriate level of on-site flood protection, detention, and drainage” (page 385). Flood control requirements dictate that the riparian corridor will be designed, managed and maintained as a flood control channel, rather than the high quality biological habitat described in the Biotic Resources of the EIR. This is supported by the statement in the EIR that the “riparian corridor has been designed to provide sufficient hydraulic capacity to accommodate the runoff from the adjacent First Phase Project and the Proposed Project” (page 372). Very little detail is provided to describe the biotic nature of the riparian corridor save the brief mention that, “Cattails or other suitable vegetation will be established in the bottom of the channel and willow shrub will be planted on the side slopes” (page 372). The nature of this vegetation is extremely vague and the EIR states that, “a program will be implemented in order to maintain the required hydraulic capacity of the channel (e.g., limit large trees from establishing within the channel and removing vegetation selectively)” (page 372).

### **Response 36-10**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The Riparian Corridor will not be designed, managed and maintained primarily as a flood control channel to the exclusion of biological issues, as the commentor suggests, nor will its flood control purpose “dictate” its design and management. The Riparian Corridor must meet numerous performance standards for the habitat to be established there. The U.S. Army Corps of Engineers required a Habitat Mitigation and Monitoring Plan (HMMP) to be developed for the Freshwater Wetlands System, in which the habitat and ecological goals, and water-related functions necessary to establish and maintain the ecological health of the Freshwater Wetlands System were specified. (See Subsection 2.1.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 410). The Army Corps of Engineers and the California Department of Fish and Game approved the HMMP, which is available in the reference library for the Draft EIR.

Compliance with the HMMP is required under the permits and approvals issued by the above federal, state and local agencies for the construction and operation of the Freshwater Wetlands System. The HMMP describes the performance standards for the habitat of the Freshwater Wetlands System, including parameters such as tree height, extent of emergent vegetation (cattails), and number of breeding bird species. The planting plan for the Riparian Corridor anticipates that large trees will not be allowed to grow along the base of channel to avoid impeding flood flows. However, the slopes of the corridor will support such vegetation and provide habitat for the majority of bird species. Compatibility of maintaining both habitat and hydraulic capacity was incorporated into the design of the system.

### **Comment 36-11**

Heal the Bay feels that it is not possible for a single parcel to serve as both a flood control channel and a riparian corridor of high habitat value. There is no mention in the EIR of a specific maintenance plan to sustain the habitat value of the riparian corridor so it must be assumed that the flood control activities will be the dominant management actions in the riparian corridor/flood control channel. We have received conflicting information pertaining to the level of mitigation credit given to Playa Vista for the riparian corridor. The EIR states that mitigation credit was given for habitat created in both the riparian corridor and the freshwater marsh. Personal communication with Playa Vista representatives, however, indicated that mitigation credit was not received for the riparian corridor. This area should not have been designated as a primary flood control structure if mitigation credit was received for the riparian corridor. Flood control maintenance activities would significantly impact the riparian community intended for the channel and would not be consistent with the ecological requirements of the corridor.

### **Response 36-11**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System. The particular issue of whether or not flood control activities will be a dominant or otherwise management action in the Riparian Corridor has been litigated in state and federal approvals.

The Riparian Corridor was never deemed to have a “primary” or “dominant” flood control role. Rather, it has always been the case that the Riparian Corridor would provide three important functions—flood control, habitat and water quality. (See, e.g., Subsection 2.1.1.4, page 410, and Subsection 3.3.1.1, on pages 453-455 of Section IV.C.(2), Water Quality, of the Draft EIR.) As discussed in Subsection 3.4.1.2.8, Section IV.C.(2), Water Quality, of the Draft EIR, compliance with the Performance Criteria established in the HMMP and O&M Manual will ensure compatibility of the flood control, habitat and water quality functions of the Riparian Corridor. Implementation of the water quality and flood control (including peak flow control and channel stability) components of the Riparian Corridor will help ensure maintenance of the habitat established there by ensuring adequate water quality for ecological purposes and habitat stability

during storms that otherwise could damage habitat. (See Subsection 3.4.1.2.1 of Section IV.C.(2), of the Draft EIR (discussing the Los Angeles County public storm drain permit (including the Standard Urban Stormwater Mitigation Plan requirements).)

The Applicant originally received mitigation credit for the Riparian Corridor from the Army Corps of Engineers, indicating that its multi-purpose role did not foreclose the potential to receive such mitigation credit, despite the commentor's suggestion to the contrary. However, because the Applicant conveyed a large portion of the Playa Vista Property (Area A and portions of Area B) to the State of California in December 2003 to be used for open space, the Army Corps of Engineers in 2003 concluded the construction of the Riparian Corridor would not be required to mitigate for the fill of wetlands in the First Phase Project and the Proposed Project. In the July 18, 2003, letter, provided as an Appendix to the Final EIR, the Army Corps stated in pertinent part: "With the proposed land transaction [then pending and since completed between Playa Capital Company and the State of California] and the elimination of the above authorized and future impacts to waters of the United States,... the Corps feels that the 23.6-acre main body of the freshwater marsh (which incidentally would benefit from any water quality functions provided by the riparian corridor) would represent adequate mitigation for the loss of physical and biological functions associated with the filling of 4.0 acres of freshwater and mixed wetlands for the construction of the freshwater marsh in Area B and the permanent loss of 3.5 acres of freshwater and mixed wetlands in Area D. Based on the intent of the approved mitigation plan, the Corps would not require the upstream 25-acre Riparian Corridor and the 2.5-acre pre-treatment area within the freshwater marsh, to exhibit an ordinary high water mark or support a three-parameter wetland area."

Therefore, no mitigation credit will be used from the creation of the Riparian Corridor.

### **Comment 36-12**

We would also like to point out an inconsistency between the Master Plan and Phase II of the Proposed project with respect to the capacity of the riparian corridor to act as a BMP to remove pollutants from source waters. The EIR for the Master Plan indicates the riparian corridor was to be used as part of the passive pollutant removal process in conjunction with the freshwater marsh.<sup>1</sup> The Phase II EIR, however, makes no mention of any pollutant removal capacity of the riparian corridor. If the riparian corridor is intended to be used as a treatment system, then it would have to be designed specific for that purpose. Based on our experience with these systems, the design and maintenance of a treatment riparian area would not provide the optimal habitat as indicated by the Biotic Resources of the Phase II EIR. In addition, a treatment riparian area would not be amenable to the maintenance required to satisfy flood control requirements.

Footnote 1 City of Los Angeles (1992) Draft Program Environmental Impact Report. Master Plan Project for Playa Vista. No. 90-0200-SUB(C)(CUZ)(CUB). p. V.C.2.B-27.

**Response 36-12**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System. As described above in Response 36-10 and Response 36-11, the Riparian Corridor is designed to serve multiple functions, with performance standards established to maintain habitat quality, ensure flood control capacity, and treat urban runoff.

The Draft EIR specifically acknowledges the water quality treatment functions of the Riparian Corridor. Subsection 3.3.1 and Subsection 3.3.1.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 453, discuss the pollutant removal function of the Freshwater Wetlands System (which includes the Riparian Corridor) and other water quality management features associated with the adjacent Playa Vista First Phase Project and the Proposed Project. Subsection 3.4.1.2.7.2 of Section IV.C.(2), Water Quality, of the Draft EIR on page 500-502, addresses in detail the impacts of proposed discharges to the Riparian Corridor and specifically discusses the treatment occurring within the Riparian Corridor and the fact that the Riparian Corridor was designed to treat urban runoff. The ability of the Riparian Corridor to remove pollutants from urban runoff was based upon information contained in the National BMP Database for vegetated swales. (See Appendix F of the Water Resources Technical Report (Appendix F-1 of the Draft EIR).)

With regard to the flood control capacity of the Riparian Corridor, please refer Subsection 3.3.1 beginning on page 372 and Subsection 3.4.1.2 starting on page 385 of Section IV.C.(1), Hydrology, of the Draft EIR. Maintenance of the Riparian Corridor to ensure it retains flood control capacity is discussed on page 372 of Subsection 3.3.1 and page 395 of Subsection 4.0 of Section IV.C.(1), Hydrology, of the Draft EIR.

The impact analysis in Subsection 3.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 545, describes the net increase in native habitat that would result from the Habitat Creation/Restoration component of the Proposed Project (including creation of the Riparian Corridor), as a comparison to existing conditions rather than as a comparison to an idealized habitat type.

**Comment 36-13**

3. The EIR does not provide an adequate description of the Riparian Corridor.

- The EIR states the Riparian Corridor will increase the amount of native habitat area in the region, with related increases in diversity and abundance of wildlife (page 546). Besides the brief mention of cattails and willow scrub referenced above in the Hydrology section, the EIR does not provide any information pertaining to the nature of the riparian corridor. In addition, the EIR does not provide sufficient detail as to the type of habitat the riparian corridor will comprise. Will the habitat in the riparian corridor be soft bottom or cobble, will the corridor



contain pools? Is there a specific type of benthic macroinvertebrate assemblage that the habitat will be optimized for? Without a detailed description of the proposed configuration and accompanying vegetation map, it is not possible for responsible agencies and members of the public to determine the impacts or benefits of this aspect of the Proposed Project. In addition, a detailed maintenance and monitoring plan should be provided in the EIR to ensure the riparian corridor is functioning as intended whether as a wildlife enhancement corridor, water treatment area, or flood control structure. The riparian corridor is part of the Phase II project. Therefore a full description of this project component is required under CEQA.

### **Response 36-13**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The landscaping and design for the Riparian Corridor is found in the three-volume Habitat Mitigation and Monitoring Plan (HMMP), which is available in the reference library for the Draft EIR. Chapter 2, page 1 of the HMMP states that the Freshwater Wetlands System (inclusive of the Riparian Corridor) will contain 4 habitat types—open water, Freshwater Marsh, willow scrub woodland, and a mixed riparian community. Plans contained in the HMMP describe a vegetated, soft-bottomed channel. While it can be expected that pools might form in the Riparian Corridor during winter rains, no permanent pools are planned or designed at specific locations. The Freshwater Marsh component of the Freshwater Wetlands system provides open water habitat with potential to support amphibians and aquatic invertebrates. The Freshwater Wetlands system as a whole, including the Riparian Corridor component, was not designed for optimizing a particular assemblage of macroinvertebrates. Instead, performance criteria focus on vegetation criteria and diversity of bird species, with the assumption that many other organisms in the ecosystem (including invertebrates) will establish on their own as part of natural growth and function of the wetland system. The HMMP was developed to describe the habitat goals and water-related issues necessary to establishing and maintaining the habitat in the Freshwater Wetlands System. It was approved by the Army Corps of Engineers and the California Department of Fish and Game.

The Operations, Maintenance and Monitoring Manual for the Ballona Freshwater Wetlands System, dated October 2001 (the “O&M Manual”), is attached as Appendix F-2 of the Draft EIR. Subsection 3.4.1.2.8 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 502-505 discusses the O&M Manual. As indicated in that Subsection, “[t]he O&M Manual describes the Freshwater Wetlands System goals, administration, operations and maintenance requirements (including timelines, task lists, and checklists), and monitoring and reporting procedures. Through implementation of the O&M Manual, Performance Criteria are being met. Verification of Performance Criteria related to particular water quality thresholds is documented through examination of the annual reports required by the Performance Criteria to be submitted to the Army Corps of Engineers, the California Coastal Commission, the California Department of Fish

and Game, the Regional Water Quality Control Board, the City of Los Angeles, and the Los Angeles County West Vector Control District.” As discussed in Subsection 2.1.1.4 on page 410, “[t]he 404 Permit, the 401 Certification, the CCC Certification, the CDP, and the HMMP established performance criteria that are designed to take into account the specific conditions of the adjacent Playa Vista First Phase Project and the Proposed Project and allow the Freshwater Wetlands System to function in its water quality, flood control, and habitat enhancement capacities (Performance Criteria).” The O&M Manual is the primary document discussing compliance with Performance Criteria (see Subsection 3.4.1.2.8 on page 503).

One purpose of the 25.1-acre Riparian Corridor is to enhance habitat values over existing conditions, as it will be constructed in an area where existing uses include 6.5 acres of paved areas, buildings, parking lots and culverts, and 0.2 acres of the Centinela Ditch. Subsection 3.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 545 states: “construction of the Project’s Riparian Corridor would replace 6.7 acres of pavement, structures, and storm drain (0.2 acre of Centinela Ditch) with native riparian habitat and native grassland.” As stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor is expected to have a beneficial effect by establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists. A second purpose of the Riparian Corridor, indicated by Subsection 3.4.1.2.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 385, is to “provide an appropriate level of on-site flood protection, detention and drainage.” A third purpose, indicated by Subsection 2.1.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 410, is to “improve the quality of urban runoff entering the Ballona Wetlands and Santa Monica Bay, reducing existing water quality impacts to the area and aiding in the national program for improvement of water quality from urban runoff.”

As indicated in Subsection 3.3.3 on page 544, monitoring data contained in Ballona Freshwater Marsh Annual Report, December 2003, have demonstrated rapid colonization of the habitat by wildlife, with the number of breeding bird species significantly greater than expected for a newly constructed habitat. Because the Freshwater Marsh and the first segment of the Riparian Corridor will be completed prior to short term impacts from construction at the Proposed Project site, birds will be able to utilize these habitat areas. Ultimately at build out of the Proposed Project enhanced habitat for birds will be provided in the Riparian Corridor and Bluff Restoration areas as well. As also stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor component of the Freshwater Wetlands System is expected to have a beneficial effect of establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists.

#### **Comment 36-14**

- Another omission in the EIR is the source of water for the riparian corridor. Water is perhaps the most critical component of the riparian corridor. There is no mention in the EIR of what sources will supply the water for the riparian corridor and how the water quality of these sources will affect the intended uses of the riparian corridor and the downstream freshwater marsh. Personal communication with representatives from Playa Vista indicated that West Basin Reclaimed Water was a potential source of water for the riparian corridor. This is inconsistent

with the EIR of the Master Plan Project for Playa Vista which states that the source of water for the riparian corridor would be the discharge of tertiary treated groundwater as well as surface inflows from local drainages.<sup>2</sup> Heal the Bay feels that several issues need to be addressed specific to the nature of the source water to effectively determine the level of impact to both the riparian corridor and the freshwater marsh. For example, the use of West Basin Reclaimed Water presents the problem of elevated nutrient concentrations. Without denitrification, water supplied to the riparian corridor and subsequently to the freshwater marsh would contribute to significant eutrophication problems. Groundwater is currently treated for VOCs through a process that would not adequately remove metals, such as copper, that are highly toxic to aquatic life. Data is not provided on the quality of the treated groundwater or other potential sourcewater from dewatering operations.

Footnote 2 *Id.* at p. V.D-31.

### **Response 36-14**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The source of water and the quality thereof for the Freshwater Wetlands System, including the Riparian Corridor, was addressed in the First Phase EIR. As stated in Subsection 2.2.1.5 of Section IV.C.(2), Water Quality, of the Draft EIR on page 434, urban runoff and treated groundwater are potential sources. Quality of any treated groundwater flowing to the Freshwater Wetlands System will be required to meet applicable standards as determined by the Regional Water Board, as discussed further in Section IV.I, Safety/Risk of Upset of the Draft EIR, as well as other applicable regulatory requirements set forth in the permits for the Freshwater Wetland System (i.e., Corps Permit No. 90-426-EV, California Department of Fish and Game 1603 Streambed Alteration Agreement No. 5-639-93, etc.). Meeting these requirements will ensure protection of downstream aquatic life. Please see also Response 36-37, below.

### **Comment 36-15**

- The volume and/or flow of water needed to maintain the riparian corridor during dry weather periods is not addressed. A minimum base flow must be maintained in the riparian corridor for the habitat to function as a riparian community. It is impossible to determine the impact of the riparian corridor to receiving waters when it is not stated in the EIR what flows are expected to be diverted through the riparian corridor as well as the anticipated water quality of such flows.

**Response 36-15**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The source of water for the Freshwater Wetlands System, including dry weather flows to the Riparian Corridor, was addressed in the First Phase EIR. In addition, as stated in Subsection 2.2.1.5 of Section IV.C.(2), Water Quality, of the Proposed Project's Draft EIR on page 434, urban runoff and treated groundwater are potential sources. Quality of any treated groundwater flowing to the Freshwater Wetlands System will be required to meet applicable standards as determined by the Regional Water Board in conjunction with the Cleanup and Abatement Order (CAO) No. 98-125 and related NPDES Permit, as discussed further in Section IV.I, Safety/Risk of Upset, of the Draft EIR, as well as other applicable regulatory requirements set forth in the permits for the Freshwater Wetland System. Based on the current design, the groundwater treatment facility is anticipated to provide approximately 0.37 cubic feet per second (cfs) to the Riparian Corridor (and, ultimately, the Freshwater Marsh), although it is being designed with the capacity to produce up to 0.44 cfs, if required. Additional flows may be provided from permanent building dewatering systems, as discussed in Response 36-37, below. This volume of water would be adequate to maintain the habitat within the freshwater marsh and riparian corridor during dry weather. With regard to urban runoff flows reaching the Freshwater Wetlands System, page 475 of Subsection 3.4.1.2.3 of Section IV.C.(2), Water Quality of the Draft EIR, states that estimated dry weather runoff to the Freshwater Marsh would be approximately 0.5 to 1 cfs. Based upon the acreages of the tributary watersheds of the Riparian Corridor and Freshwater Marsh (shown in Table 42 on page 445 of Section IV.C.(2), Water Quality of the Draft EIR) it is estimated that approximately 50 percent of the urban runoff dry weather flows to the Freshwater Marsh would flow through the Riparian Corridor.

Moreover, Table 29 of Section IV.C.(1), Hydrology, of the Draft EIR on page 384 provides a breakdown of sources of runoff volumes expected to flow into the Riparian Corridor. The Riparian Corridor and the Freshwater Marsh were designed as an integrated system, with the Freshwater Marsh having the capacity to receive and treat flows from the Riparian Corridor and other sources. Additional details of this system and impacts of the discharge of water from the Riparian Corridor to the Freshwater Marsh and other downstream features can be found in Subsection 3.4.1 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 459-510. Water quality within the Riparian Corridor itself is discussed on pages 500-502 of Subsection 3.4.1.2.7.2, Section IV.C.(2), Water Quality, of the Draft EIR. With specific regard to the stormwater flows entering the Riparian Corridor, the quality of such flows was incorporated into the qualitative and quantitative assessment of surface water quality and, for modeling purposes, water quality of flows entering the Riparian Corridor was derived from land-use specific monitoring data collected by the Los Angeles County Department of Public Works. (See Subsection 3.2.4.3.1.3 on page 3-56 of Section 3 of the Water Resources Technical Report (Appendix F-1 of the Draft EIR).)

**Comment 36-16**

The EIR does not mention when the riparian corridor will be completed. Heal the Bay has several concerns regarding the timing of the completion of the riparian corridor. The EIR states that there may be potentially significant short-term adverse impacts to migrant birds due to loss of nesting habitat until the Habitat Creation/Restoration component of the Project becomes established (PAGE 546). In addition, the EIR does not provide an adequate description of runoff conditions during construction activities prior to the completion of the riparian corridor. We feel that it is extremely important that the riparian corridor be completed prior to the initiation of construction of the urban development component. To reduce the “short-term” loss of nesting habitat for migrant birds, construction permits should not be issued until the riparian corridor is completed.

**Response 36-16**

As stated in Section II.B, Project Characteristics, of the Draft EIR on page 154, the Riparian Corridor component of the Proposed Project is the last segment of a 25-acre Riparian Corridor that will feed into the Freshwater Marsh. As stated in Subsection 2.3 of Section IV.D, Biotic Resources, of the Draft EIR on page 539, construction of the west segment of the Riparian Corridor is expected to be completed by late 2005. Construction of the western third of the Riparian Corridor commenced in 2003. Subsection 4.0, on pages 394-395 of Subsection 4.0, Section IV.C.(1), Hydrology, of the Draft EIR indicates that the Applicant, prior to the issuance of any building permits for the Proposed Project, is required to “complete or otherwise guarantee completion” of the Riparian Corridor along with other structural BMPs.

The Draft EIR identifies that potentially significant short-term impacts on migrant birds may occur if construction occurs during nesting season. A mitigation measure is proposed to minimize this potential impact, however, as described in subsection 5.0, Section IV.D, Biotic Resources, on page 551 of the Draft EIR, the short-term loss of marginal nesting habitat for common migrant birds is considered a significant unavoidable adverse impact of the Proposed Project. However, as indicated in Subsection 3.3.3 of Section IV.D, Biotic Resources, of the Draft EIR on page 544, monitoring data for the Freshwater Marsh have demonstrated rapid colonization of the habitat by wildlife, with the number of breeding bird species significantly greater than expected for a newly constructed habitat. Because the Freshwater Marsh and the first segment of the Riparian Corridor will be completed prior to short term impacts from construction at the Proposed Project site, birds will be able to utilize these habitat areas. Ultimately at build out of the Proposed Project enhanced habitat for birds will be provided in the Riparian Corridor and Bluff Restoration areas as well.

The Riparian Corridor has been designed as a permanent BMP serving the Proposed Project. Temporary BMPs are well-recognized as the primary method of addressing temporary potential impacts during the construction process. (See General Stormwater Construction Permit, State Board Order No. 99-08-DWQ, located in the reference library for the Final EIR.) To address potential water quality impacts during the construction phase, Subsection 4.0, page 519 of

Section IV.C.(2), Water Quality, of the Draft EIR indicates that a proposed mitigation measure is implementation of BMPs under the Stormwater Pollution Prevention Plan (SWPPP), which will incorporate the Proposed Project. Under the SWPPP, and the General Construction Stormwater Permit program under which the SWPPP is prepared, the BMPs must meet technology standards (Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology) to reduce or eliminate pollution from stormwater and any dry weather flows from the construction site (State Board Order No. 99-08-DWQ, ¶ 1). In addition, the Performance Criteria applicable to the Proposed Project (Subsection 3.4.1.2.8, page 503 of Section IV.C.(2), Water Quality, of the Draft EIR) include requirements from a water quality certification issued by RWQCB for the Playa Vista development, specifying requirements that must be addressed in the SWPPP including: procedures for stabilizing denuded areas (including uses of mulches, seeding, planting or sodding), procedures for identification and protection of sensitive areas (including use of vegetative buffers, sediment barriers, filters, dikes or mulching), procedures for reducing gully and rill erosion (including the use of trenches and berms as appropriate), procedures for construction entrances (including the use of gravel, crushed rock or other appropriate materials), and procedures for periodic street cleaning to remove soil and sediment deposits. (401 Certification, Appendix I (included in the reference library for the Draft EIR).)

Additionally, Subsection 4.0 of Section IV.C.(2), Water Quality, of the Draft EIR on page 519, lists typical erosion and sediment control BMPs to be required at the Proposed Project. As stated in Subsection 3.4.1.1 on page 462, the construction impacts for the Proposed Project will be addressed through implementation of the existing SWPPP. As the Proposed Project land uses and topography are similar to the adjacent First Phase Project, construction activities at the Proposed Project will be similar, and the SWPPP as amended for the Proposed Project would address adequately potential water quality impacts associated with such construction. Through employment of these BMPs through the SWPPP the Draft EIR concluded that water quality impacts from construction activities would be less than significant. (Subsection 3.4.1.1., page 463 of Section IV.C.(2), Water Quality, of the Draft EIR.)

#### **Comment 36-17**

4. The data provided by the current biological survey is inadequate.

According to the EIR, recent field surveys were limited to three days, December 18, 2002, and February 13 & 18, 2003. Although there have been numerous biological surveys performed in the project area over the past 20 years, these previous surveys as listed in Appendix G do not characterize the site in its existing condition. CEQA requires that all impacts are compared to existing conditions of the project. Any biological surveys performed prior to the initiation of construction of Phase I would not document the Proposed Project site in its existing condition. The significant loss of adjacent open space and wetland habitat pursuant to the construction of Phase I may have significantly altered the biotic uses of the site. Three days of samples clustered in a 3 month period during the winter season does not provide sufficient information to establish existing conditions. These surveys cannot accurately account for the temporally variable use of the project site, especially by migratory birds, during existing conditions (i.e., post Phase I construction). At a minimum, surveys should include several days of observations during

periods of peak bird migration. In addition, a summary of the results of surveys performed prior to the construction of Phase I would enable the assessment of how construction activities have changed the biotic nature of the project site.

### **Response 36-17**

Section IV.D, Biotic Resources, of the Draft EIR did not rely upon a 3-day field survey. Instead, as stated at the beginning of Subsection 2.2 of Section IV.D, Biotic Resources, of the Draft EIR on page 526, the analysis also considered results from numerous previous surveys conducted over a period of about 30 years. These studies are listed in Table 2-1 of Appendix G-2 of the Draft EIR. These studies encompassed the full range of seasonal variability in migratory birds.

Please see Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

### **Comment 36-18**

5. The size of a “suitable buffer” must be explicitly defined.

The EIR states that field surveys will be conducted by a qualified biologist within 3 days of grading activities to determine if birds protected under the Migratory Bird Treaty Act or California Fish and Game Code are found to be nesting on site. If protected species are found nesting on the site, than [*sic*] they will be protected according to the biologists recommendations including but not limited to a suitable buffer area around the nest which shall not be disturbed until the young have fledged. Heal the Bay feels that a buffer should be required for ALL protected nesting birds and that the buffer should be specified in the EIR and be consistent with US Fish and Wildlife guidelines to protect nesting sites from surrounding construction activities.

### **Response 36-18**

The terms “appropriate buffer” and “suitable buffer” are used in Subsection 4.0 of Section IV.D, Biotic Resources, of the Draft EIR on page 550 to refer to undisturbed open space that helps minimize impacts of construction activities on bird species during the nesting season. The size of the buffer would depend on the species potentially affected, and site-specific circumstances; therefore, the mitigation measure requires a qualified biologist to conduct the pre-construction survey. As indicated in Subsection 4.0 of Section IV.D, Biotic Resources, of the Draft EIR on page 550, all nesting birds protected by the Migratory Bird Treaty Act or the California Fish and Game Code would be protected by the referenced construction mitigation measure.

### **Comment 36-19**

6. Heal the Bay disagrees with the EIR assessment that the Proposed Project will not interfere with wildlife movement/migration corridors.

The Proposed Project is located in the highly urbanized environment of Coastal Southern California. There is very little open space left in this region. Consequently, any decrease in the amount of open-space in this environment has the potential to have a significant negative impact on wildlife movement/migration corridors. This is especially pertinent for migratory birds or non-migratory raptors that have been previously found to utilize the site as nesting and foraging habitat.

### **Response 36-19**

Because there is no evidence that bird flight paths have become established at any consistent location or direction over the site of the Proposed Project, it is not anticipated that the Proposed Project would adversely affect their movement. As stated in Subsection 2.2.1.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 535, certain bird species have been observed flying or foraging over the site. However, these observations do not mean that the site is a wildlife movement corridor, which is defined as a linkage between areas of core habitat and which is applied typically applied to mammalian wildlife rather than birds (see Appendix G-2 of the Draft EIR, page 35).

As stated in Section II.B, Project Characteristics, of the Draft EIR on page 154, the Riparian Corridor component of the Proposed Project is the last segment of a 25-acre Riparian Corridor that will feed into the Freshwater Marsh. Construction of the west segment of the Riparian Corridor commenced in 2003 and is expected to be completed by late 2005 (Subsection 2.3 on page 539). As indicated in Subsection 3.3.3 on page 544, monitoring data for the Freshwater Marsh have demonstrated rapid colonization of the habitat by wildlife, with the number of breeding bird species significantly greater than expected for a newly constructed habitat. Because the Freshwater Marsh and the first segment of the Riparian Corridor will be completed prior to short term impacts from construction at the Proposed Project site, birds will be able to utilize these habitat areas. Ultimately at build out of the Proposed Project enhanced habitat for birds will be provided in the Riparian Corridor and Bluff Restoration areas as well. As also stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor component of the Freshwater Wetlands System is expected to have a beneficial effect of establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists.

### **Comment 36-20**

#### **Water Quality**

7. Analysis of water quality impacts to Ballona Creek Estuary and Ballona Wetlands from the proposed project is inadequate because treatment efficiencies of the Freshwater Marsh for discharge from the existing First Phase development have not been verified with monitoring data.

The efficacy of the marsh as a BMP for runoff from the proposed project cannot be ascertained without establishing the current functionality of the marsh to treat the discharge from the First



Phase Development. No estimates of treatment efficacy based on actual field data were provided in the EIR. Instead, the EIR analysis relies on engineering estimates based on the design of the marsh. These estimates are insufficient because actual monitoring results can be collected to verify predicted removal efficiencies.

The freshwater marsh should be monitored and the results used to determine pollutant removal efficiencies for all 303(d) listed pollutants (particularly lead, zinc, copper, PAHs, bacteria, pesticides, pH, and trash) from both the dry and wet-weather discharge from the First Phase development. Based on this, analysis of impacts from the proposed project's urban runoff discharges can then be adequately assessed.

### **Response 36-20**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The discussion of pollutant removal approximations within Subsection 3.2.4.3 of the Water Resources Technical Report (Appendix F-1) states that the performance of the Freshwater Wetlands System during storms was modeled on the National Stormwater BMP database, which database contains extensive information regarding the performance during storms of various kinds of BMPs at numerous places throughout the country. Pollutant removal approximations for the Freshwater Marsh and Riparian Corridor during storm conditions were specified based on BMP performance data in the National BMP Database, and used a quantitative (modeling) stormwater assessment (Subsection 3.4.1.2.5, Subsection 3.4.1.2.6, Subsection 3.4.1.2.7, Section IV.C.(2), Water Quality, of the Draft EIR). A complete description of the model methodology is described in Subsection 3.2.4.3 of Section 3 of the Water Resources Technical Report (Appendix F-1) of the Draft EIR. Pollutant removal approximations from the National BMP Database were not used to characterize pollutant removal from dry-weather flows. Rather, the potential impacts of dry weather flows were assessed qualitatively (Subsection 3.4.1.2.3, Section IV.C.(2), Water Quality, of the Draft EIR). A quantitative assessment of dry-weather water quality was not conducted because land use-based data were unavailable for estimating dry-weather runoff volumes, loads, or concentrations from the Proposed Project. Existing dry-weather data were analyzed to assess potential impacts, but as stated in Subsection 3.2.4.6.2.6, Section IV.C.(2), Water Quality, on page 472, “[l]imited dry-weather monitoring data are available for assessing ambient dry-weather concentrations and loads to receiving waters after build-out of the Proposed Project.” Please also see Response 36-3, above, which describes the current and future monitoring efforts for the Freshwater Marsh, and which describes that available Freshwater Marsh dry weather data discussed in the Draft EIR was used to assist in predicting the performance of the Freshwater Marsh.

While the water quality assessment uses the available data at the Playa Vista project area (Table 38, on page 431, Section IV.C.(2), Water Quality, of the Draft EIR) to the extent possible

(especially in the context of assessing dry weather conditions), use of these data to assess future water quality potential impacts (especially conditions during storm events) is not appropriate.

For wet weather, the engineering estimates used in the Draft EIR water quality analysis are superior to any “actual monitoring results” which commentor would use to analyze the Proposed Project. It is well known that stormwater quality can vary greatly during and between storms. Therefore, the utilization of actual monitoring results for a few storms at the Playa Vista development is unlikely to provide an analysis that is representative of long-term conditions. In contrast, the regional stormwater quality data utilized to define potential pollutant load from various land uses at the Proposed Project were collected from an aggregate of 278 storms in the greater L.A. area over 6 years, representing a total of 15,641 sample analyses. The BMP performance information obtained from the National BMP Database enables the performance of numerous BMPs similar to the ones included in the Proposed Project to be utilized. For example, data from 18 of 33 wet ponds in the National BMP Database were utilized to define the ability of the Freshwater Marsh to remove pollutants in urban runoff (selected ponds had sufficient data for analysis and tributary land uses similar to those at the Proposed Project). The National BMP Database contained information on wet ponds (retention ponds) from 378 storms during which 14,293 analyses were conducted. The robustness of the National BMP Database compared with on-site monitoring of a few storms collected from a partially built Freshwater Wetlands System is obvious from the following summary information in Table 36-20.

**Table 36-20**

**SUMMARY OF DATA IN NATIONAL STORMWATER BMP DATABASE**

<b>BMP Type</b>	<b>Number of BMPs in Category</b>	<b>Number of Storm Events Monitored<sup>a</sup></b>	<b>Number of Water Quality Analyses<sup>a,b</sup></b>
Detention Basin	24	129	4,209
Grass Filter Strip	32	227	6,251
Media Filter	30	187	6,144
Porous Pavement	5	5	55
Retention Pond	33	378	14,293
Percolation Trench and Dry Well	1	3	21
Wetland Channel And Swale	14	53	1,241
Wetland Basin	15	221	7,320
Hydrodynamic Devices	17	171	6,190
<b>Total</b>	<b>171</b>	<b>1,374</b>	<b>45,724</b>

<sup>a</sup> Only events that included the collection of event mean concentrations (EMCs) have been included in the summary statistics presented in this table.

<sup>b</sup> Includes all pollutants analyzed for all storm events monitored.

The approach taken in the Draft EIR to assess the effectiveness of the Freshwater Marsh as a BMP established with reasonable accuracy the functionality of the Freshwater Marsh and enabled a fully adequate assessment of potential water quality impacts to the Ballona Creek Estuary and Ballona Wetlands.

**Comment 36-21**

8. Analysis of impacts to the Freshwater Marsh from the proposed project is inadequate:

a) Existing water quality conditions in the marsh have not been adequately established, thus evaluation of impacts from additional loading to the marsh cannot be completed. The EIR includes the results from only three dry-weather sample events of the marsh which were conducted during its construction. No data were presented on water quality conditions in the marsh after it became fully functional as a BMP receiving discharge from the fully completed First Phase development. No wet weather data was provided. Thus, the existing water quality in the marsh has not been established. Adequate impact analysis of the proposed project can be completed without establishing current conditions in the Marsh.

We recommend that additional water quality sampling of the Freshwater Marsh be completed and the EIR revised.

**Response 36-21**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

As discussed more fully in Response 36-3, above, the Freshwater Wetlands System water quality program, as set forth in the O&M Manual (Appendix F-2 of the Draft EIR), commenced in March 2003. Existing water quality data for the Freshwater Marsh is presented in Subsection 2.2.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR. The Ballona Freshwater Wetland System Annual Report, December 2003, summarizes the monitoring data for the first year of operation, and is included in the reference library for the Final EIR. No wet weather data were available at the time of publication of the Draft EIR or preparation of these responses.

Construction in the adjacent First Phase Project and Freshwater Wetlands System is ongoing. With regard to the Freshwater Marsh, as indicated in Section IV.C.(2), Water Quality, of the Draft EIR on page 474, 8 acres of the Freshwater Marsh are yet to be constructed, the Riparian Corridor is currently under construction, and the vegetation in the Freshwater Marsh has not yet fully matured. The Freshwater Marsh is a constructed marsh that will require time to fully establish wetland biota. Because of the ongoing construction in the tributary watershed served by the Freshwater Marsh as well as the completion of the Freshwater Marsh construction and ongoing development of the vegetation within the Marsh, the existing condition of the Marsh is in a transitional state.

As described further in Response 36-3 and Response 36-20, above, the dry weather water quality data collected from the Freshwater Marsh along with the data utilized in the National Stormwater

BMP database presented a reasonable characterization of the predicted water quality within the Freshwater Marsh and an adequate impact analysis in the qualitative and quantitative assessments presented in the Draft EIR. The Draft EIR provides extensive analysis of the pre-First Phase, post-First Phase, and post-Proposed Project conditions, together with data from intermediate steps in the construction of the entire Freshwater Wetlands System, including the Riparian Corridor. Furthermore, loadings of pollutants entering the Freshwater Marsh (whether increases or decreases relative to the pre-First Phase condition, post-First Phase condition, or condition at build out of the Proposed Project) were specifically contemplated within the design of the Freshwater Marsh, and any increases in loadings were determined to be insignificant based upon the anticipated benefits of the Freshwater Wetlands System. (Subsection 3.4.1.2.7.1, page 499 of Section IV.C.(2), Water Quality, of the Draft EIR.)

Additional monitoring data beyond what has been provided already in the Draft EIR (Subsection 2.2 of Section IV.C.(2), Water Quality) will be obtained and reported as scheduled in the O&M Manual.

### **Comment 36-22**

b) The freshwater marsh is a water of the U.S. because mitigation credits were received for marsh construction.

Evaluation of the proposed project's compliance with applicable water quality standards and regulations is not possible until it is clear where the point of regulatory compliance is located. Heal the Bay believes the freshwater marsh is considered a water of the U.S., so water quality regulations and standards must be complied within the marsh. Heal the Bay strongly believes since mitigation credits were received for the marsh, then water quality standards and regulations must apply in the marsh itself to ensure a healthy marsh ecosystem exists.

The existing data and analysis in the EIR is not sufficient to determine whether compliance with water quality standards will be met in the marsh. In fact, as discussed above, there is not enough data in the EIR to even ascertain the existing water quality in the marsh.

### **Response 36-22**

The Freshwater Marsh is not part of the Proposed Project. The Freshwater Wetlands System was previously analyzed in the First Phase Draft EIR and upheld in numerous legal challenges. (See *Wetlands Action Network v. United States Army Corps of Engineers, et al.*, 222 F.3d 1105 (9th Cir. 2000) (2000 WAN Decision), cert. denied, 534 U.S. 815 (2001) (challenge to the Army Corps of Engineers Section 404 permit); *Save Ballona Wetlands v. City of Los Angeles, et al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994) (challenge to the City's EIR for the First Phase Project); *Earth Trust Foundation, et al. v. City of Los Angeles, et al.*, No. SS006405 (Los Angeles Sup. Ct., decision filed August 18, 1996), affd. No. B106408 (Ct. App. 2nd App. Dist., decision filed May 15, 1997) (challenge to the City's Addendum to the EIR for the First Phase Project).) With respect to the Riparian Corridor, no mitigation credit is being sought as discussed in Response 36-2, above.

As determined by the Army Corps of Engineers, there is “no need for the 51.1-acre freshwater wetland system to be subject to numerical water quality standards as waters of the United States.” (July 18, 2003, letter, attached as an Appendix of the Final EIR.) The Corps required the construction of the Freshwater Marsh to cleanse sediments and contaminants before they entered waters of the United States. (See United States Army Corps of Engineers, Permit No. 90-326-EV [“Corps Permit”], on page 42 [Environmental Assessment]). (This item is located in the reference library for the Final EIR.) The Permit’s Environmental Assessment acknowledged that while ordinarily, the Corps required a 1:1 mitigation ratio, but in the case where the Freshwater Marsh would fulfill several roles, including that as a detention basin, flood control facility, and regulator of freshwater flowing to the Ballona Wetlands, the Corps accepted the much larger 51-acre “wetland complex” as a “package” unit. (Corps Permit, Environmental Assessment on pages 42 and 52-53.)

In its Environmental Assessment of the Freshwater Wetland System, the Corps accepted the water quality standards imposed by the Coastal Commission upon the Freshwater Marsh. (Environmental Assessment, p. 41). The issue of water quality requirements within the Freshwater Marsh was addressed in the Coastal Commission’s adopted findings for the Freshwater Marsh (California Coastal Commission, Adopted Findings, July 17, 1991, App. No. 5-91-463, pp. 25-26), (included in the reference library for the Final EIR). As stated therein, the Coastal Commission observed:

The freshwater wetlands system will trap and remove pollutants in stormwater runoff as the water moves slowly through the system.... Even though the project will reduce pollutants from surface runoff into Santa Monica Bay and Ballona Channel, it raises concerns over the input of pollutants into the freshwater marsh.... According to calculations made based upon U.S. Environmental Protection Agency methodology, rainfall and stormwater runoff upon entry in to the riparian corridor and freshwater marsh will meet water quality criteria suggested by the U.S. Fish and Wildlife Service for crop irrigation and livestock....

The Coastal Commission found that water quality within the freshwater wetlands system was required to be “suitable to support vegetation and wildlife” (California Coastal Commission, Staff Report: Permit Amendment, March 27, 1992, App. 5-91-463-A2, p. 10) or, as indicated in the quote above, crop irrigation and livestock standards as utilized by U. S. EPA. (This item is located in the reference library for the Final EIR.) (See, e.g., Ronald Eisler, Lead Hazards to Fish, Wildlife & Invertebrates: A Synoptic Review (Biological report 85 (1.15) (This item is located in the reference library for the Final EIR) and Contaminant Hazard Reviews Report No. 14) (referenced in the Administrative Record for the First Phase EIR and included in the reference library for the Draft EIR).)

In May 1992, the Applicant’s predecessor proposed to the Corps a plan to monitor nutrients, organics, and heavy metals within the freshwater marsh. (Sharon Lockhart to John Gill (Regulatory Branch), May 11, 1992). (This item is located in the reference library for the Final EIR.) As part of the Environmental Assessment for the Freshwater Wetlands System, the Corps accepted the plan. (Environmental Assessment, p. 41.)

Because the Freshwater Marsh is part of a “package” to be constructed to help restore the much-larger Ballona Wetlands, the fact that mitigation credits were received does not mean that the Freshwater Marsh is a “waters of the United States.” The Army Corps of Engineers in its reasonable discretion determined that a multi-functional Freshwater Wetlands System, upstream of the Ballona Wetlands, was a necessary component of efforts to restore the Ballona Wetlands. Since such restoration of the Ballona Wetlands necessarily entailed the treatment of urban runoff before it entered the Ballona Wetlands, the Army Corps of Engineers reasonably could and did dedicate the Freshwater Wetland System, including the Freshwater Marsh to water quality treatment, as well as to habitat and flood control. This dedication removed the Freshwater Wetland System from the ambit of “waters of the United States.” Moreover, the July 18, 2003, letter from the Army Corps of Engineers indicated that the Corps no longer considered the pretreatment areas of the Freshwater Marsh (as well as the Riparian Corridor) to be subject to any mitigation credit, given the scaled down plan of development for Playa Vista. Notwithstanding, for purposes of assessing the functioning of the Freshwater Marsh as habitat, the water quality of the Freshwater Marsh itself was assessed in Subsection 3.4.1.2.7.1 of Section IV.C.(2), Water Quality, of the Draft EIR. This assessment demonstrated that water quality within the main body of the Freshwater Marsh (exclusive of the pre-treatment areas), after build out of the Proposed Project, is expected to meet all water quality benchmarks utilized in the Draft EIR, including water quality standards such as the California Toxics Rule. (See Draft EIR, Section IV.C.(2), Subsection 3.4.1.2.7.1.)

### **Comment 36-23**

It also does not appear that the project will comply with the current trash TMDL for Ballona Creek in the marsh. Applying the tributary rule, the trash TMDL limits would have to be met in the marsh if it is considered a water of the U.S. and therefore a tributary to Ballona Creek. Additionally, the EIR contains no discussion on if and how the project proponents plan to meet the future bacteria and metals TMDLs. Since the project proponent is depending on the marsh as the primary treatment for the polluted urban runoff discharged from the site, compliance with these future TMDLs within the marsh will require additional mitigation upstream of the marsh. How will the project proponents ensure compliance with these TMDLs?

### **Response 36-23**

The Freshwater Marsh is not a part of the Proposed Project. Moreover, the “tributary rule” of Regional Water Board’s Basin Plan does not operate such that “the trash TMDL [total maximum daily load] limits would have to be met in the” Freshwater Marsh. The “tributary rule” states that “waters not specifically listed (generally smaller tributaries) are designated with the same beneficial uses as the streams, lakes, or reservoirs to which they are tributary.” (Regional Water Board, Basin Plan on page 2-4.) The “tributary rule” applies only to “waters of the United States,” and therefore it does not apply to the Freshwater Marsh or Riparian Corridor and would not extend downstream beneficial uses to the Freshwater Marsh or the Riparian Corridor. The waters to which the Freshwater Marsh releases (i.e., the waters to which it is tributary, the Ballona Channel and Ballona Wetlands) are not “streams, lakes or reservoirs.” Finally, the beneficial uses designated for the Ballona Channel and the Ballona Wetlands do not apply to the

Freshwater Marsh, as the designated uses for the Ballona Channel and Ballona Wetlands include navigation, estuarine habitat, and shellfish harvesting, none of which are potential or actual uses of the Freshwater Marsh.

The foregoing notwithstanding, as indicated in Subsection 3.4.1.2.5 and Subsection 3.4.1.2.6 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 478 and 484, respectively, the Proposed Project incorporates BMPs that will comply with the trash TMDL. As stated in Subsection 3.3.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 453, source controls that will be implemented to reduce trash loads include covered trash and recycling facilities, a street and catch basin cleaning program, and a tenant/resident education program. These source controls work by reducing the amount of trash, litter and debris that is available to come into contact with stormwater. The Proposed Project also incorporates structural BMPs such as catch basin inserts at numerous catch basins where stormwater first enters the storm drain system and trash racks at the inlets to the Riparian Corridor. Furthermore, the Freshwater Marsh includes “full capture” trash screens at all of its inlets. As indicated in Subsection 3.3.1.2 on page 457, the trash screens will be designed to meet the RWQCB’s definition of “full-capture devices,” as that term is used in the TMDL for the Ballona Creek watershed. Full-capture devices must be designed to remove particles as small as 5 millimeters without clogging and are deemed by the RWQCB to satisfy the zero-discharge TMDL. (Los Angeles Regional Water Board, Ballona Creek and Wetlands Trash TMDLs, at 2, [www.swrcb.ca.gov/~rwqcb4/html/meetings/tmdl/ballona\\_creek/01\\_0919\\_bc\\_Ballona%20Creek%20Trash%20TMDL.pdf](http://www.swrcb.ca.gov/~rwqcb4/html/meetings/tmdl/ballona_creek/01_0919_bc_Ballona%20Creek%20Trash%20TMDL.pdf).) This item is located in the reference library for the Final EIR. Structural BMPs such as the above work by intercepting trash before it enters downstream receiving waters.

The Freshwater Marsh is designed to capture the 1-year storm event and route these flows to the Ballona Channel. For many storms, and indeed probably for entire years during drought periods, there will be no discharges from the Proposed Project to the Ballona Wetlands, further protecting this receiving water from potential discharges of trash. As described in Subsection 3.4.1.2.5 on page 483, the Proposed Project includes stormwater BMPs that would be expected to result in a near zero release of any trash through the storm drain system. Signage and other education programs will inform residents and visitors about proper trash disposal. Frequent street sweeping would effectively remove trash from street surfaces. Trash racks at the inlets to the Riparian Corridor and managed indoor trash collection and storage areas for residents and managed trash collection areas for commercial businesses would also reduce trash from the Proposed Project. Separate from the Proposed Project, the Freshwater Marsh will include full capture trash screens that meet TMDL requirements at all of its inlets.

The Draft EIR discusses how the Proposed Project will meet the “future bacteria” TMDL. The Draft EIR discusses bacteria as a constituent of concern and assesses potential impacts in Subsection 3.4.1.2.3, Subsection 3.4.1.2.4, Subsection 3.4.1.2.5, and Subsection 3.4.1.2.6 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 472, 476, 478, and 484, respectively. Moreover, Subsection 3.2.4.6.2.4 page 3-90 through 3-93 and page 3-97 through 3-98, of Section 3 of the Water Resources Technical Report (Appendix F-1 of the Draft EIR) contains a detailed discussion of impairing pollutants, including bacteria. Discharges of bacteria from the Proposed Project are not expected to be significant, or cause or contribute to existing bacteria

impairment in the receiving waters. See further Response 36-5 for a discussion of the bacteria assessment in the Draft EIR and BMPs to address bacteria. Thus, the Proposed Project will comply with the future bacteria TMDL. Further, since neither the Freshwater Marsh nor the Riparian Corridor is required to meet numerical water quality standards applicable to “waters of the United States,” the future TMDL will not require “additional mitigation upstream of” the Freshwater Marsh or within the Riparian Corridor.

The Draft EIR at page 406, Table 31, Section IV.C.(2), Water Quality, lists a number of metals for which receiving waters downstream of the Proposed Project are impaired, but indicates that the State Water Board had recommended de-listing of most of these impairments, reflecting agency determinations that these receiving waters are no longer impaired for these metals. (State Water Board Staff Report, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments (Feb. 2003) ([www.swrcb.ca.gov/tmdl/docs/staff\\_report\\_303d\\_vol2\\_021903.pdf](http://www.swrcb.ca.gov/tmdl/docs/staff_report_303d_vol2_021903.pdf).) This item is located in the reference library for the Final EIR. The final list of impaired waters currently available on the State Water Board website indicates that the only impairments from metals in the downstream receiving waters are in the Ballona Channel for lead and zinc ([www.swrcb.ca.gov/tmdl/docs/2002reg4303dlist.pdf](http://www.swrcb.ca.gov/tmdl/docs/2002reg4303dlist.pdf)). This item is located in the reference library for the Final EIR. The analysis presented in the Draft EIR indicates that potential discharges of lead and zinc from the Proposed Project will not violate water quality standards for the Ballona Channel, and therefore will not cause or contribute to existing impairment by lead and zinc in the Ballona Channel. Thus, discharges from the Proposed Project will comply with any future TMDL for lead and zinc in the Ballona Channel. Since neither the Freshwater Marsh nor the Riparian Corridor is a “waters of the United States” for which beneficial uses have been designated or numerical water quality standards apply, any such TMDL will not “require additional mitigation upstream” of the Freshwater Marsh or within the Riparian Corridor. See further Response 36-22 and Response 36-25.

### **Comment 36-24**

Under any compliance assessment scenario, water quality standards must be met in discharges to the salt marsh and Ballona Creek. In addition, because of the water quality standards compliance issues and requirements under the Clean Water Act, discharges may require WDRs or other types of permits to enable the treatment marsh to discharge to the salt marsh and Ballona Creek. This issue must be adequately addressed in the EIR.

### **Response 36-24**

The Draft EIR, Section IV.C.(2), Water Quality, acknowledges that water quality standards apply within the downstream waterbodies—the Ballona Channel and Ballona Wetlands. However, it is not correct that “water quality standards must be met in discharges to” the Ballona Channel and Ballona Wetlands. Rather, in accordance with the applicable stormwater permits, these discharges must not cause or contribute to exceedances of water quality standards in these receiving waters. This distinction is important because the water quality standards themselves, including their numeric values, do not apply directly to the stormwater discharges.



Waste Discharge Requirements (WDRs) are not required for the Freshwater Marsh or the Riparian Corridor, as the Freshwater Marsh and the Riparian Corridor are both BMPs for urban runoff. As a BMP, neither the Freshwater Marsh nor the Riparian Corridor is a “point source” for permitting purposes.

Even if one were to assume that discharges from the Freshwater Marsh (or discharges from the Riparian Corridor to the Freshwater Marsh) “may require WDRs or other types of permits,” (which assumption would be incorrect), no new WDRs would be necessary. As discussed in Subsection 2.1.1.2 and Subsection 3.4.1.1 of Section IV.C.(2), Water Quality, of the Draft EIR on pages 402 and 461, respectively, the Statewide General Construction Stormwater Permit will provide WDRs for runoff from the Proposed Project during construction. “It is anticipated that the Proposed Project will be covered under the statewide NPDES General Construction Permit” (Subsection 2.1.1.2 on page 404) and that implementation of the existing SWPPP, as amended to incorporate the Proposed Project, “will adequately address potential water quality impacts” during construction (Subsection 3.4.1.1 on page 463).

Discharges of urban runoff in the Los Angeles area, including future urban runoff from the Proposed Project, are covered by a regional permit for urban runoff issued by the Regional Water Quality Control Board, and constituting WDRs for those discharges. A primary focus of the Regional Water Quality Control Board’s urban runoff permit is controlling discharges from new development and redevelopment projects, such as the Proposed Project. This permit is a jurisdiction-wide permit covering all storm drain pipes conveying urban runoff in Los Angeles County and encompassing the Proposed Project area. Subsection 3.4.1.2.1 on page 464 of Section IV.C.(2), Water Quality, of the Draft EIR, describes in detail how the Proposed Project will meet the elements of this permit.

As stated in a letter dated January 16, 2003, from the Regional Water Quality Control Board, attached as an Appendix to the Final EIR and referenced in Note 111 in Appendix F-1 of the Draft EIR, no new permits are required to govern urban runoff from the Playa Vista development area, including the Proposed Project. In pertinent part, the Regional Water Quality Control Board stated: “If Playa Vista were required to obtain its own storm water permit for discharges comprised solely of urban runoff, the Regional Board’s municipal storm water function would require multiple, overlapping municipal storm water permits.... [I]t is not clear how such an approach would enhance water quality, because the permits would simply duplicate requirements in the overlying MS4 Permit.” (Regional Water Quality Control Board letter, at 2-3.)

The Draft EIR undertook a conservative analysis regarding water quality standards and examined whether the discharges from the Freshwater Marsh would meet the water quality standards of the downstream receiving waters. This analysis was based on the fact that if the discharges themselves met the standards, then those discharges could not cause or contribute to exceedances in the receiving water. As presented in the Draft EIR, these predicted average concentrations in flows were well below the water quality standards for all compounds analyzed. (Subsection 3.4.1.2.7 on pages 495-500 of Section IV.C.(2), Water Quality, of the Draft EIR.)

**Comment 36-25**

Also, the EIR must address the issue of whether or not compliance with water quality standards is necessary for discharges (runoff and other sources) to the marsh. With all of the discharge and water quality compliance issues brought up by this project, thorough analyses of these issues and corresponding mitigation requirements need to be in the EIR.

**Response 36-25**

The discharge standards to the Freshwater Marsh were approved when local, state and federal permits were issued for the Freshwater Marsh. As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System. As determined by the U.S. Army Corps of Engineers, there is “no need for the 51.1-acre freshwater wetland system to be subject to numerical water quality standards as waters of the United States.” (July 18, 2003, Letter from U.S. Army Corps of Engineers, Note 111, Section 3, Subsection 3.2.3.1, page 3-30, of Appendix F-1, included as an Appendix to the Final EIR.) Furthermore, the Army Corps confirmed that the Riparian Corridor and the pre-treatment areas of the Freshwater Marsh were not necessary for mitigation and are not subject to numeric water quality standards as “waters of the United States.” (July 18 Letter, included as an Appendix to the Final EIR.) Notwithstanding the Army Corps of Engineers statements regarding the primary management areas (pre-treatment areas), an analysis of water quality within the primary management areas indicated that water quality standards are satisfied at the boundaries between the primary management areas and the main body of the Freshwater Marsh, and possibly at locations even closer to the actual inlet points. (Subsection 3.4.1.2.7.1, page 497 to 499 of Section IV.C.(2), Water Quality of the Draft EIR.)

**Comment 36-26**

This comment should not be construed as an organizational opposition to treatment wetlands. Heal the Bay has a history of supporting the construction and maintenance of treatment wetlands that were specifically built for water quality improvements. Heal the Bay strongly believes that treatment wetlands can be a very effective method to help alleviate water quality problems. However, Heal the Bay believes that no mitigation credit should have been given for treatment wetlands associated with this project. If no mitigation credit was received, than [*sic*] many of our concerns regarding water quality in the treatment wetland and riparian corridor would have been alleviated.

**Response 36-26**

Mitigation credits are limited to the main body of the Freshwater Marsh which was previously analyzed in the First Phase Draft EIR and upheld in numerous legal challenges; see further

Response 36-2. (See Army Corps of Engineers (USACE) letter dated July 18, 2003, attached as an Appendix of the Final EIR and referenced in Note 111 of Appendix F-1 of the Draft EIR.) The Freshwater Marsh is a multi-functional facility providing habitat and flood control services, as well as treatment, and therefore is not a “treatment wetland.” No mitigation credit is being received for the Riparian Corridor or the pre-treatment areas of the Freshwater Marsh. With regard to the commentor’s statements regarding its position generally on treatment wetlands, the comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 36-27**

9. Impacts from the project on the sediments in the freshwater marsh including the long-term management of these sediments were not adequately addressed.

The EIR briefly refers to an operation and maintenance plan for the freshwater marsh, but does not include any analysis on how the increased pollutant loadings from the proposed project will impact sediment management in the marsh. The EIR states that pollutants will be removed in the marsh through sedimentation. How will the quality of the sediments in the marsh be impacted by the project? How will the ecology of the marsh be affected by these sediments? How much sediment will be routinely dredged from the marsh and the three management areas, and how much is attributable to the proposed project? How will this dredging affect the ecology of the marsh? Where will the sediment dredged from the three management areas and the marsh be disposed of?

### **Response 36-27**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The management and maintenance of the Freshwater Marsh was established during the permitting process of the adjacent First Phase Project. As stated in the Subsection 2.1.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 409: “The 404 Permit, the 401 Certification, the CCC Certification, the CDP, and the HMMP established performance criteria that are designed to take into account the specific conditions of the adjacent Playa Vista First Phase Project and the Proposed Project and allow the Freshwater Wetlands System to function in its water quality, flood control, and habitat enhancement capacities (Performance Criteria).” All of the Performance Criteria were compiled in the O&M Manual (Appendix F-2 of the Draft EIR), which includes sediment monitoring and maintenance activities, including removal and disposal.

As addressed in Subsection 3.3.2 on page 458 of Section IV.C.(2), Water Quality of the Draft EIR, the monitoring and maintenance (e.g., vegetation and sediment removal) would be

performed as prescribed in the O&M Manual (see Appendix F-2 of the Draft EIR for details) to ensure that quality of the sediment accumulated remains below levels of concerns associated with metals, pesticides, and other toxic chemical as they relate to potential bioaccumulatory and toxicity impacts.

Also stated in Subsection 3.4.1.2.2 on page 469 of Section IV.C.(2), Water Quality of the Draft EIR: “The Freshwater Wetlands System O&M Manual specifies bioaccumulation/toxicity analysis and monitoring on vegetation and sediment removed during maintenance operations, which will occur as needed, at least every 10 to 20 years in the Freshwater Marsh and Riparian Corridor and possibly annually in the primary management areas. The pollutant loading model indicates that less than half of the total suspended solids (TSS) entering the Freshwater Marsh will originate from the Playa Vista First Phase Project and Proposed Project areas (approximately 41 percent), with remaining solids originating from off-site sources. Calculations based upon estimated TSS removals indicate that the frequency of maintenance might be as low as once every 100 years in the primary management areas; however, a 10- to 20-year frequency was conservatively estimated to account for unanticipated sediment loadings caused by infrequently large storm events or other unpredictable causes. Vegetation and sediment removal frequencies and amounts will depend on sediment accumulation rates and results of annual sediment quality analyses conducted as part of the HMMP and the State Water Board’s Water Quality Certification Program. Samples of sediment and plant materials for bioaccumulation analysis will be submitted to a state certified laboratory for soluble Threshold Limit Concentration and Total Threshold Limit Concentration analyses. Results of the bioaccumulation tests, as well as the other sediment quality monitoring results, will be used to determine proper disposal methods of the removed materials and any further measures required in the Freshwater Wetlands System to retain habitat quality objectives.”

As outlined in Subsection 3.3.1 and Figure 33 on pages 453 and 454 of Section IV.C.(2), Water Quality of the Draft EIR, respectively, the Proposed Project includes a treatment train of BMP controls, including stormwater planter boxes, swales, inlet cleaning, street cleaning, underground parking and trash areas, education and other source controls to reduce the amount of sediments that reach the Freshwater Marsh as well as any contaminants from the Proposed Project area.

### **Comment 36-28**

10. Analysis of the impact the project will have on bacteria densities within the Ballona Creek Estuary and on nearby Santa Monica Bay beaches is inadequate. Ballona Creek Estuary is listed on the 303(d) list as impaired for bacteria and a TMDL will be adopted. Data were not included in the EIR to show whether the Marsh will act as a source or sink of bacteria.

A comprehensive analysis of this potential impact of the project is warranted because Ballona Creek Estuary and nearby Santa Monica Bay beaches are currently impaired in wet and dry weather due to levels of fecal bacteria indicators that are unsafe for recreational use. Land use data collected by SCCWRP for the RWQCB and by LA County Stormwater monitoring have shown that bacteria loading from residential and commercial land use, such as those included in the proposed project, can be significant.

Analysis of impacts on bacteria densities in the receiving waters from stormwater discharge is largely qualitative and inadequate. The stormwater modeling should be expanded to include bacteria. Data to complete this modeling is available. Recent bacteria TMDLs for several waterbodies within Region IV have been completed that included stormwater modeling, and local land use data on bacteria loading is available. Analysis of dry weather discharge impacts on bacteria densities to Ballona Creek Estuary is also incomplete. Again, analysis is largely qualitative, relying solely on data from three sampling events completed during the construction of the marsh.

The stormwater BMPs proposed for the development are not specifically designed to remove fecal bacteria indicators, although removal through particle collection may occur. The freshwater marsh, the main BMP for the development, may act as a sink for bacteria because the residence time may allow for more bacteria die-off and removal due to UV exposure and sedimentation. On the other hand, the marsh may act as a source if it attracts a large population of birds and if conditions in the marsh are conducive to bacteria regrowth in the organic debris and sediment within the marsh. A recent Southern California study on coastal saltwater wetlands suggested these wetlands may act as a source of bacteria, not a sink.<sup>3</sup> Years of coastal monitoring by local health departments at the outlets of wetlands and estuaries have shown high densities of fecal bacteria discharging from these systems (see Heal the Bay's Annual Beach Report Card Reports at [www.healthebay.org](http://www.healthebay.org)). How is the freshwater marsh different from these wetlands?

The impact of the marsh, either to act as a source or a sink for bacteria, must be established before the impacts of the project on bacteria densities in the Ballona Creek estuary can be fully assessed in the EIR. Monitoring of the Freshwater Marsh both in wet and dry weather must be completed to ascertain the effect of the marsh on bacteria densities. Depending on the result of an adequate assessment of this impact, treatment of the discharge may be necessary.

Footnote 3 Grant, S.B., et al., 2001, Generation of Enterococci Bacteria in a Coastal Saltwater marsh [*sic*] and It's [*sic*] Impact on Surf Zone Water Quality, Environ. Sci. Technol., Vol. 35, No. 12.

## Response 36-28

See Response 36-3, above, regarding past, current, and future monitoring of water quality within the Freshwater Marsh. Also see Response 36-5, above regarding the analysis of bacteria in the Draft EIR and BMPs selected to address bacteria.

It is expected that levels of bacteria will decrease in the Freshwater Marsh, not increase. In other words, the Freshwater Marsh will be a sink for bacteria, not a source. This expectation is based upon information contained in the National Stormwater BMP Database, upon which the performance of the Freshwater Marsh was based, and also upon information available from a similar but larger freshwater marsh located near the coast in Orange County. Information contained in the National Stormwater BMP Database indicates that wet ponds provide a sink for

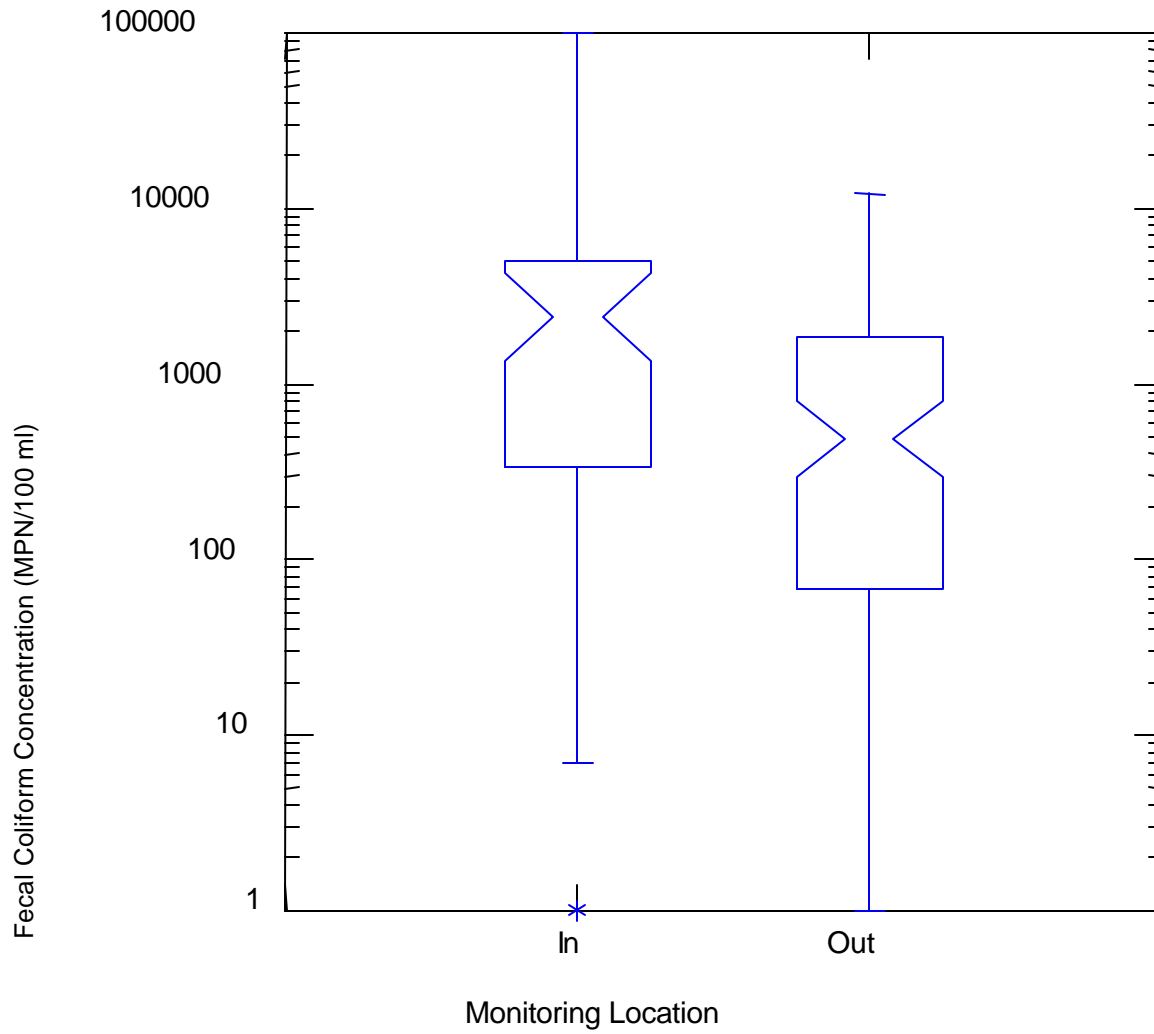
bacteria, rather than a source. The City's consultants analyzed information on bacteria levels coming into wet ponds and leaving wet ponds available in the National Database for four wet ponds. The average levels of bacteria entering the wet ponds was 11,000 colonies per 100 ml, which levels were reduced by about 90 percent to a value of about 1,100 colonies per 100 ml at the downstream end of the wet ponds. These results are shown in the following figure, which was based upon the same methodology as in Eric Strecker, et al., "A Reassessment of the Expanded EPA/ASCE National BMP Database," Proceedings of the World Water and Environmental Congress 2003 (June 23-26, 2003, Philadelphia, PA). This item is located in the reference library for the Final EIR.

Information on bacteria levels in the San Joaquin Marsh in Central Orange County, near Upper Newport Bay likewise shows that freshwater wetlands can be a sink for bacteria entering into these wetlands during dry weather flows, even if significant habitat is being managed for shore birds. See further discussion in Response 36-5, above, regarding the reductions of bacteria occurring in the San Joaquin Marsh during dry weather and the overall low levels of bacteria in that marsh. The results reported by Strecker, et al. based on their analysis of the BMP Database and for the San Joaquin Marsh are consistent with other literature. Such literature indicates that bacteria is associated strongly with sediment and has been shown to be removed significantly through sedimentation processes occurring in wetlands and wet ponds, like the Freshwater Marsh. (See, e.g., C. Davies and H. Bavor, "The fate of stormwater-associated bacteria in constructed wetland and water pollution control pond systems" (89 *J. Appl. Microbiol.* 349-360, Aug. 2000); T. Wong, et al., "Ponds vs. Wetlands—Performance Considerations in Stormwater Quality Management," *Proc. of the Comprehensive Stormwater and Aquatic Ecosystems Management First South Pacific Conference*, at 223-231 (Feb. 22-26, 1999, Auckland, New Zealand). This item is located in the reference library for the Final EIR. Reduction of bacteria in pilot and full-scale wetland systems has been summarized by Kadlec and Knight. In general, reported reduction was in the range of 85 to 99.9 percent and depicted as a first-order function against detention time (R.H. Kadlec and R.L. Knight, *Treatment Wetlands*, CRC Press, 1996). This item is located in the reference library for the Final EIR.

The studies referred to by commentor are distinguishable from the instant case. The study by Stanley Grant was for a saltwater wetland near Huntington Beach, not a Freshwater Marsh like the one at Playa Vista. For example, saltwater marshes, such as the one from the Grant study, are influenced by tidal flushing—which shortens residence time for water in the marsh and prevents some solar degradation of bacteria as a consequence. Assessment of the commentor's annual Beach Report Cards does not yield the conclusion suggested by the commentor, as linkage to discharges from wetlands and estuaries is not provided within the Report Cards.

As discussed in Subsections 3.4.1.2.3, 3.4.1.2.4, 3.4.1.2.5, and 3.4.1.2.6 of Section IV.C.(2), Water Quality, of the Draft EIR, bacteria in dry weather and stormwater flows exiting the Freshwater Marsh are not expected to be significant due to a combination of source controls (including pet waste control programs and new wastewater systems), structural solar destruction of bacteria within the Freshwater Wetlands System. Under dry weather conditions, existing monitoring data have not shown bacteria within the Marsh to be elevated (with the highest observed concentration of fecal coliforms as 42 MPN/100ML—well below the Basin Plan

**Figure 36-28. Wet Weather Fecal Coliform Analysis  
For Retention Ponds (4 RPs) from National BMP Database**



requirement of 200 MPN/100ml). During dry weather, bacteria in the Freshwater Marsh will be reduced by exposure to sunlight, during the extended residence times in the open water areas of the Marsh.

The presence of birds within the Freshwater Marsh does not mean that the Freshwater Marsh will be a source of human pathogenic bacteria. Rather, as indicated by the data from the San Joaquin Marsh (see further Response 36-5), where the wetlands managers actively and successfully attract birds to the area, bacteria levels exiting the Freshwater Marsh are expected to be within applicable water quality standards. Due in part to its greater distance from the shoreline than the saltwater marsh studied by Dr. Stanley Grant (as referred to by the Commentor), the Freshwater Marsh is expected to be more like the San Joaquin Marsh, and less like the saltwater marsh studied by Dr. Grant, where Dr. Grant reported elevated levels of bacteria associated with bird droppings. (S.B. Grant et al., 2001 Progress Report: Identification and Control of Non-Point Sources of Microbial Pollution in a Coastal Watershed (available on U.S. EPA's website at [http://cfpub.epa.gov/ncer\\_abstracts/index.cfm/fuseaction/display.abstractDetail/abstract/575/report/2001](http://cfpub.epa.gov/ncer_abstracts/index.cfm/fuseaction/display.abstractDetail/abstract/575/report/2001)). This item is located in the reference library for the Final EIR.

Finally, the available monitoring data for bacteria are not suitable for computer modeling because the monitoring primarily consists of collecting grab samples which typically are not considered representative of bacteria levels over an entire storm and the monitoring methods and units of measurement of existing data are not sufficiently consistent. The modeling conducted as part of the Draft EIR relied on annual average storm-event concentrations rather than grab samples. Attempting to model bacteria based on the available monitoring data for bacteria would entail speculation; therefore, bacteria was qualitatively assessed in both the Draft EIR and the Water Resources Technical Report. (See, e.g., Subsection 3.4.1.2.3 on page 472, Subsection 3.4.1.2.4 on page 477, Subsection 3.4.1.2.5 on page 483 of Section IV.C.(2), Water Quality of the Draft EIR, and Subsection 3.2.4.6.2.4 on pages 3-97 to 3-98 of Section 3, Water Quality of the Water Resources Technical Report (Appendix F-1 of the Draft EIR).) The TMDLs referenced by the commentor did not incorporate wet weather modeling for bacteria. In the wet-weather bacteria TMDL for Santa Monica Bay, the RWQCB specifically rejected modeling of bacteria since the available land-use based grab sample data (from the Los Angeles County database) do not permit evaluation of bacteria density changes during storm events and the data are limited in terms of the types of "critical sources" of bacteria sampled. (Los Angeles Regional Water Board, Santa Monica Bay Wet-Weather Bacteria TMDL, page 34 (available at [www.swrcb.ca.gov/rwqcb4/html/meetings/tmdl/santa\\_monica/02/1025/02\\_1107\\_wet%20weather%20vers4.1\\_no%20strikeout.pdf](http://www.swrcb.ca.gov/rwqcb4/html/meetings/tmdl/santa_monica/02/1025/02_1107_wet%20weather%20vers4.1_no%20strikeout.pdf).) This item is located in the reference library for the Final EIR.

### **Comment 36-29**

11. The analysis of impacts on water quality due to stormwater is inadequate because the stormwater modeling apparently did not account for the increase in pollutant loading caused by the substantial increase in traffic that will occur on existing roads due to the proposed project. The increase in traffic is critical to the water quality impact analysis because vehicles are a



primary source of lead, zinc, and PAHs to urban runoff, and because the Ballona Creek Estuary is already impaired because of these pollutants.

The stormwater modeling was based on land use and associated event mean concentrations of pollutants. Thus, it appears the only way the model accounted for traffic is by increasing the amount of land used for transportation. Clearly, the project will significantly increase traffic on existing roads. Increased vehicles on the road will increase concentrations and loadings of several pollutants in the stormwater runoff that enters the Freshwater Marsh including PAHs, metals, and oil and grease. In fact, Heal the Bay believes the increase in traffic will be the most significant new source of pollutants from the project to the receiving waters. Was the increase in traffic on existing roads accounted for in some other way in the modeling exercise?

If not, then the stormwater analysis should be revised to include evaluation of increased pollutant concentrations from the increase volume of traffic in the areas that drain to the Freshwater Marsh. Impacts to the marsh, the effectiveness of the marsh to treat these pollutants, and the impacts to Ballona Creek Estuary and Wetlands should be evaluated.

In addition, analyses of impacts to water quality were focused on pre-[P]hase I conditions. CEQA requires that all impacts be evaluated in relation to existing conditions. Therefore, all water quality analyses for Phase II should be performed with existing conditions of Phase I rather than to pre-[P]hase I conditions.

### **Response 36-29**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

It was assumed for purposes of modeling that lead, zinc, and PAH loads would be within the representative concentrations and loads detected in the regional sampling and analysis conducted by Los Angeles County, which monitoring reflects the full range of traffic conditions within the Los Angeles region. Traffic at the Proposed Project is anticipated to be within this range and may even be at the low end of the range given the various traffic improvements that are planned for the Proposed Project. Major roads in proximity to the Freshwater Marsh consist of Lincoln Boulevard, Jefferson Boulevard, and Culver Boulevard. Based on the traffic volumes projected in the traffic study for the Draft EIR for these roadways in the area surrounding the Marsh, the Proposed Project is anticipated to result in increased average daily trips (ADT) of 1.5 percent. As a result, the Proposed Project is not anticipated to substantially contribute to increased loadings of automobile-related pollutants in the area.

Additionally, the model utilized in the Draft EIR is based on land use—not traffic density. The information used to estimate pollutant concentrations in roadway runoff are based on the Dominguez Channel Monitoring Station (S23), which has a watershed consisting predominantly

of transportation land uses, including areas of LAX and Interstate 105. Considering the significant amount of traffic these two areas receive, the estimates used to model the roadways near the Proposed Project are likely conservative even for built-out conditions. The Federal Highway Administration studies (Driscoll, et al., 1990) found that highway site runoff water quality was not very well correlated with average traffic volumes, only finding that highways/freeways of greater than 30,000 vehicles per day were different (more pollutants in runoff), than those with less than 30,000 vehicles per day. (This item is located in the reference library for the Final EIR.) Dominquez Channel Monitoring Station captured traffic loads in excess of 30,000 vehicles per day. The model, therefore, accounts for any increased traffic loads from the Proposed Project.

Lead is primarily a legacy pollutant that is less of a concern from new traffic sources than from previously contaminated sediments, due to the elimination of the use of lead in gasoline. Data regarding PAHs (which can be associated with exhaust from vehicles) is limited because land use-based data is rarely observed above detection limits (i.e., the L.A. County monitoring efforts rarely observed concentrations above analytical detection limits); see further Response 36-4. Nonetheless, PAHs are qualitatively discussed in detail in Subsection 3.2.4.6.2.4 of Appendix F-1 of the Draft EIR on page 3-96.

The Draft EIR evaluates three different conditions—pre-First Phase, post-First Phase, and post-Proposed Project—and provides data on intermediate steps in the construction process of the entire Freshwater Wetlands System. Subsection 3.1.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 441 explains: “In order to provide a more complete and meaningful analysis of water quality impacts associated with the Proposed Project and to evaluate the adequacy of the Freshwater Wetlands System to accommodate both adjacent Playa Vista First Phase Project and Proposed Project flows, the pollutant loads from the pre-First Phase conditions have been compared to the pollutant loads estimated to occur at the completion of the adjacent Playa Vista First Phase Project and at the completion of the Proposed Project (buildout) through the use of a pollutant loading model.”

The conditions that existed prior to construction of the Freshwater Wetlands System (pre-First Phase conditions) are analyzed because the Freshwater Wetlands System was designed as a regional system to treat storm water runoff from the First Phase Project and off-site areas, in addition to runoff from the Proposed Project. The rationale for originally analyzing the entire Freshwater Wetlands System, including the entire Riparian Corridor, in the Draft EIR for the First Phase Project was precisely because it is a single, unified system.

Using the pre-First Phase Project as a basis for analysis is consistent with, and supported by, the watershed-based approach to management of urban runoff encouraged by regulatory officials. (See State Water Board Order No. 2000-11 (finding regional stormwater treatment a “more technically effective” alternative to Best Management Practices that serve only a particular development); Los Angeles Public Storm Drain Permit, Findings 18 & 20 ([www.swrcb.ca.gov/rwqcb4/html/programs/stormwater/la\\_ms4\\_final/FinalPermit.pdf](http://www.swrcb.ca.gov/rwqcb4/html/programs/stormwater/la_ms4_final/FinalPermit.pdf)) (finding watershed management provides a means to comprehensive and integrated water resources protection); and State Water Board, Nonpoint Source Program Strategy and Implementation Plan, 1998-2013 (PROSIP) at 1, 7, 39 (2000) (finding runoff management on a watershed scale can provide

unique solutions for each watershed that consider local conditions and pollutant sources).) (These items are located in the reference library for the Final EIR.)

Moreover, as discussed in Subsection 3.1.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 367, in addition to evaluating the changes between pre-First Phase conditions and the Proposed Project, the Draft EIR “also indicates the incremental changes between the adjacent Playa Vista First Phase Project condition and Proposed Project conditions.” The loading and concentration changes were shown in the tables in Section IV.C.(2), Water Quality, of the Draft EIR, as well as in the Water Resources Technical Appendix. See e.g., Section IV.C.(2), Subsection 3.4.1.2.2 on page 471, Subsection 3.4.1.2.4 on page 476, Subsection 3.4.1.2.5 on pages 478 and 482, Subsection 3.4.1.2.6 on page 484 and 485, Subsection 3.4.1.2.7 on page 489, Subsection 3.4.1.2.7.1 on pages 490 through 493 and on page 498, Subsection 3.4.1.2.7.2 on page 500, Subsection 3.4.1.2.9 on page 506, and Subsection 6.0 on pages 520 and 521 of the Draft EIR; and Table 44 on page 479, Table 48 on page 486, Table 52 on page 491, Table 53 on page 492, Table 54 on page 493, Table 55 on page 494, Table 60 on page 501 and Table 61 on page 502 of the Draft EIR. This comparison is exactly what the comment requests.

The conclusions regarding the potential of surface water quality impacts were predicated upon a comparison between post-First Phase and post-Proposed Project water quality, as well as a comparison between pre-First Phase and post-Proposed Project water quality, and are true for both scenarios.

As the commentor notes, as of November 2002 (when the Notice of Preparation was issued), the Freshwater Wetlands System was not fully constructed and was not functioning as it will be at completion of the First Phase Project. In November 2002, construction of the Freshwater Marsh was incomplete and construction of the Riparian Corridor had not yet begun. To the extent vegetation had been planted in the Freshwater Marsh, that vegetation was still in the process of growth and maturation, both of which are part of the Freshwater Wetlands System design to improve water quality performance. (See Subsection 3.4.1.2.3, page 472 of Section IV.C.(2), Water Quality, of the Draft EIR.) The Freshwater Marsh had just begun receiving water from the Jefferson storm drain (as of November 4, 2002). Although the Central Storm Drain was connected to the Freshwater Marsh, because the majority of the First Phase Project residential area was under construction, very few of the catch basins were draining to the Freshwater Marsh. In fact, most of the First Phase Project site undergoing site preparation had been graded to drain to the east, into a temporary detention basin, which had been installed in the Proposed Project area to allow stormwater to settle before being pumped to the Central Storm Drain. In addition, a connection from Centinela ditch under Lincoln Boulevard to the Freshwater Marsh was still active; this connection was serving only a small portion of the First Phase Project site as the Centinela Ditch within the First Phase Project residential area had been filled to prepare for construction of Bluff Creek Drive.

Due to the transitory nature of the First Phase Project site and the incomplete status of construction of the Freshwater Marsh as of November 2002, modeling of the water quality conditions existing at that time would not be informative. The Draft EIR provides information that brackets the construction of the Freshwater Wetlands System by assessing site conditions

pre-First Phase—when none of the First Phase Project had been constructed—and by assessing site conditions assuming full build-out of the First Phase Project, when the Freshwater Marsh and the eastern and western portions of the Riparian Corridor would be constructed. Moreover, to the extent feasible, incremental data as requested by the commentor also was provided.

### **Comment 36-30**

12. The proposed project will increase loads of lead and zinc discharged into the Ballona Creek Estuary. The Estuary is listed as impaired due to the accumulation of lead and zinc in the sediment and for sediment toxicity. Any additional loading will contribute to this impairment, may be illegal, and must be eliminated or mitigated.

Stormwater modeling results estimate an increase in lead and zinc loads from the First Phase project loads (Table 44). We believe the model significantly underestimated the increase in these loads because the model did not include the additional traffic that will occur on the existing roads that contribute runoff to the marsh and ultimately to Ballona Creek Estuary (see comment #5).

Any increase in the loadings of pollutants that accumulate in tissue and sediment in a waterbody that is already impaired due to excessive accumulation will exacerbate a serious water quality problem. Ballona Creek Estuary is impaired due to accumulation of lead and zinc in the sediment, and for sediment toxicity. Sediment impairment is of particular ecological concern because the sediment houses key food sources in the Estuary. Thus, any increase in loadings of bioaccumulating pollutants, including lead and zinc, is a significant impact because of existing impairments, may be illegal, and should be eliminated or mitigated. Under the Clean Water Act, new sources of impairing constituents to 303(d) listed waters must provide no additional loadings. If new loadings of impairing constituents are present, then the loadings must be mitigated off-site in the drainage of the impaired water.

### **Response 36-30**

Please see Response 36-29 for a discussion of incremental changes between First Phase and Proposed Project conditions as well as for a discussion regarding the modeling conducted as part of the Draft EIR's accounting for the increased traffic from the Proposed Project.

Please see Response 36-4 for a discussion regarding why loadings of lead and zinc were not substantially underestimated in the pollutant modeling.

While the model predicts slight increases in loads of lead and zinc between build out of the adjacent First Phase and build out of the Proposed Project, substantial decreases are predicted when comparing to pre-First Phase conditions; concentrations of lead and zinc will remain unchanged or decrease when compared to First Phase concentrations, decrease substantially when comparing to pre-First Phase conditions, and at buildout will be well below CTR criteria values. (Tables 44, Table 46, Table 48, and Table 50 of Section IV.C.(2), Water Quality, of the Draft EIR, as revised and presented in Section II.6, Corrections and Additions, of this Final EIR.)

To the extent that lead and zinc are contained in flows from the Proposed Project and enter the Ballona Creek Estuary, such releases will be less than significant. First, the runoff from the Proposed Project area is not a “new source” of pollutants. Prior to construction of the Freshwater Marsh (which remains in progress), runoff from this area had flowed untreated for decades. In part to address the problems posed by these untreated flows, the Applicant self-imposed a goal of “no net increases” of pollutant loads or concentrations as compared to pre-First Phase conditions; this goal is met with the Proposed Project. (Subsection 3.1.1, Subsection 3.4.1.2.4, Subsection 3.4.1.2.5, Subsection 3.4.1.2.6 of Section IV.C.(2), Water Quality, of the Draft EIR.)

Second, the new loads of lead and zinc from the Proposed Project, if any, are expected to be less than significant due to the implementation of the metals-related BMPs. Any insignificant levels of lead and zinc from the Proposed Project are not expected to cause or contribute to existing impairment, or otherwise exacerbate already-degraded conditions. Although not an environmental issue, the State Water Board recognizes that even new loads of impairing pollutants to impaired water bodies are not illegal *per se*, and that it cannot be assumed that a water body has no capacity to assimilate even insignificant new loadings. (See, e.g., In the Matter of the Review on its Own Motion of Waste Discharge Requirements for the Avon Refinery, Order WQ 2001-06 (finding that even if a waterbody is impaired a Regional Water Board cannot assume there is no remaining capacity to assimilate more of the impairing pollutant, overturning a permit limit of zero for a new discharge of the impairing pollutant).) This item is located in the reference library for the Final EIR.

With specific regard to bioaccumulative pollutants and sediment toxicity, such issues were discussed in Subsection 3.4.1.2.2 on pages 467–69, where it was concluded that through extensive source and treatment control BMPs, as well as frequent monitoring and maintenance planned for the Freshwater Wetlands System, the potential bioaccumulatory and toxicity impacts associated with metals, pesticides, and other potentially toxicity chemicals are not expected to create pollution, contamination, or nuisance. Predictions for bioaccumulative metals represented in the Draft EIR for flows into receiving waters do not account for the assimilative capacity of the receiving waters, and therefore, likely overestimate the pollutants detectable in the receiving waters. For example, with reference to the Ballona Channel, Subsection 3.4.1.2.5 on page 480, states that the “predicted influent concentration do not take into account the ambient water quality of the Ballona Channel or the substantial amount of stormwater runoff that occurs upstream of the channel segment adjacent to Playa Vista.” In light of this fact, in light of the assimilative capacity of the receiving water, in light of the substantial reductions in loads and concentration of lead and zinc at project build out (in comparison to pre-First Phase conditions) (Table 44 on page 479 of Section IV.C.(2), Water Quality, of the Draft EIR), and in light of the fact that concentration of lead and zinc under post-Proposed Project conditions are predicted to be well-below water quality standards meant to protect aquatic life and human health, changes in the receiving waters would not represent a significant environmental impact or exacerbate sediment toxicity issues within the Ballona Channel.

**Comment 36-31**

13. The potential impacts due to an increase in loadings of PAHs to Ballona Creek Estuary and Santa Monica Bay have not been adequately analyzed.

The increase in PAH loading to the Estuary and Santa Monica Bay was virtually ignored in the EIR (page 467). Clearly, PAH loading is already a significant problem in the Ballona Creek watershed. Both the Ballona Creek Estuary and Santa Monica Bay are impaired due to excessive accumulation of PAHs in the sediment. It is likely that the elevated PAH concentrations in the sediment contribute to the sediment toxicity impairment in Ballona Creek Estuary. Existing data on stormwater PAH concentrations do not adequately capture the problem of PAHs because concentrations are often below detection limits and will not provide data to estimate loads.

Vehicles are a significant source of PAHs. Major intersections in the area of the project drain to the Freshwater Marsh. The project, which include 2600 housing units and over 150,000 square feet of commercial/retail space, will significantly increase traffic and exacerbate the PAH loading problem from the proposed project.

The EIR should be revised to quantitatively estimate the increase in PAH loads that will occur with development of the project as proposed. This increase should be eliminated or mitigated since any amount of additional loading of PAHs to the Estuary or Bay is a significant impact because of the existing impairments.

**Response 36-31**

Please see Response 36-4 for a discussion regarding assessment of PAHs and any any flows from the Proposed Project containing PAHs that may reach impaired water bodies. Further, as the commentor notes, existing data on PAHs, as shown in Tables 32, 33, 35, 37 and 38 of the Draft EIR, all show concentrations below detection limits, with one exception (Table 32, page 416, shows observed concentrations of naphthalene from ND (non-detect) to 3.1 µg/l).

**Comment 36-32**

14. The potential impacts to sediment toxicity in the Ballona Creek Estuary from increased loadings of pesticides, PAHs, and metals have not been adequately analyzed.

Increases in loadings of pesticides, PAHs, and metals (other than lead, zinc, and copper) and the impacts associated with these increases were cursorily discussed and dismissed in the EIR (page 467-469). It is clear from the stormwater modeling of lead, zinc, and copper that some increase in the loadings of these pollutants will likely occur. The EIR contains no analysis of the impacts to sediment toxicity from the increase of all these pollutants collectively.

We believe any increase in loadings of pollutants that accumulate in sediment will result in significant impacts because Ballona Estuary is listed as impaired due to sediment toxicity. The

analysis in the EIR of water quality impacts should be revised to include estimates of loadings of pollutants that accumulate in sediment that will occur due to the proposed project and the project should be modified to eliminate these increases.

### **Response 36-32**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System. See also Response 36-4, Response 36-30, and Response 36-31 for discussions of sediment toxicity, pesticides, PAHs, and metals (including lead and zinc). Also, please see Response 36-4 for a discussions regarding flows entering impaired waters.

### **Comment 36-33**

15. Since the Ballona Creek Estuary and Santa Monica Bay is impaired due to elevated levels of chlordane in the sediment, any increased loading of this pesticide must be mitigated or eliminated. We strongly recommend that the project proponent commit to a ban on the use of pesticides in public landscaped areas, particularly chlordane, on the proposed development to ensure no additional loading of these pesticides occurs.

The analysis of potential impacts from chlordane discharged in the urban runoff from the proposed project was not adequate in the EIR. The potential increase in chlordane loads to the Estuary and Santa Monica Bay was not quantitatively evaluated. Instead the EIR dismissed impacts from pesticides, in part because “monitoring of Los Angeles County’s stormwater has resulted in the determination that most pesticides are at undetectable levels and, when they are detectable, the concentrations minimally exceed the detection limits.” There are two potential problems with this reasoning. First, for some pesticides, the analytical detection limits are often above concentrations of concern (CTR standards). In addition, for pollutants that accumulate in sediment, loadings not concentrations, are the concern.

Chlordane use is obviously a problem in Ballona Creek watershed since it is accumulating in the Estuary sediments. Diazinon, another pesticide commonly used in urban areas, is becoming more of a concern over time throughout urbanized areas. The EIR states “The Proposed Project has committed to minimizing the use of pesticides and herbicides through the use of both source and structural controls. Pesticides would only be applied when needed in public landscaped areas by qualified landscape professionals...” (page 468). We believe this commitment does not go far enough, considering the serious sediment quality problem that exists in Ballona Creek Estuary. Heal the Bay fails to see the need for any pesticide use since the project proponents are committed to planting primarily native vegetation. The project proponents should commit to banning the use of all pesticides in the public landscaped areas since any increase in loading of chlordane or other pesticides to Ballona Creek Estuary will exacerbate an existing impairment. At an absolute minimum, Playa Vista needs to agree to implement an Integrated Pest

Management approach that is comparable to the approach adopted by the LA Unified School District.

### **Response 36-33**

Chlordane has been banned from use for several decades and will not be used at the Proposed Project. (Subsection 3.2.4.6.2.4, page 3-94 of the Water Resources Technical Report (Appendix F-1 of the Draft EIR.) Chlordane is not typically detected in urban runoff from residential, retail, commercial, and light industrial properties as found in the L.A. County monitoring data. As discussed further in Section IV.I, Safety/Risk of Upset, of the Draft EIR, pesticides, including chlordane were not detected in sediments at the Proposed Project site above guideline levels used to determine significance. Notwithstanding, BMPs have been incorporated into the Proposed Project to address chlordane and other historical pesticides, including paving and landscaping to contain any historical sources, and sediment and erosion controls utilized during the construction phase. (Subsection 3.2.4.6.2.4, page 3-94 of the Water Resources Technical Report (Appendix F-1 of the Draft EIR.) Based on the above factors, the Draft EIR appropriately concluded that potential impacts from chlordane and other pesticides are not significant. (Subsection 3.4.1.2.2, page 469 of Section IV.C.(2), Water Quality of the Draft EIR.)

Regarding diazinon, in January 2001, U.S. EPA began phasing out most diazinon uses; under the program, all indoor uses were terminated in 2002, and sales for all outdoor non-agricultural were terminated in 2003 ([www.epa.gov/pesticides/op/diazinon/agreement.pdf](http://www.epa.gov/pesticides/op/diazinon/agreement.pdf)). This item is located in the reference library for the Final EIR. With no agricultural uses planned for the Proposed Project and given the recent EPA actions, diazinon will not be used at the Proposed Project site, and for reasons similar to the reasons above related to chlordane, impacts from diazinon were concluded not to be significant in the Draft EIR. (Subsection 3.4.1.2.2, page 469 of Section IV.C.(2), Water Quality, of the Draft EIR.)

Because it has been concluded that the Proposed Project would not result in any significant impacts from chlordane, diazinon, or other pesticides, as discussed above, a ban of all pesticide use in public landscaped areas or implementation of an Integrated Pest Management approach similar to the L.A. School District is not required as mitigation. However, it should be noted that an Integrated Pest Management Plan similar to one developed and implemented by the Applicant for the Culver Boulevard Loop/Widening project (part of the previously approved First Phase Project's traffic mitigation program) is anticipated to be implemented for the Proposed Project.

### **Comment 36-34**

16. The discharge of any dry weather runoff from the project to Ballona Creek Estuary is illegal under the Los Angeles County Municipal Stormwater permit. The project proponent must eliminate all dry weather discharge from the freshwater marsh to Ballona Creek Estuary.

Dry weather discharge of urban runoff violates the Los Angeles Municipal Stormwater permit (with limited exceptions as noted in Appendix F of the EIR). There are two areas of concern



regarding dry weather flow: flow from the project area itself and flows from offsite. With regard to the former, the EIR states “the quantity of runoff associated with dry-weather flows from the Proposed Project areas is expected to be negligible....” (page 472). The EIR also states repeatedly that all the requirements of the municipal Stormwater permit will be met. To ensure this compliance, the EIR should contain a commitment by the project proponents that no dry weather flow will be discharged from the project.

Additionally, the EIR states “Dry-weather flows will also enter the Proposed Project areas from off-site land uses, including the Westchester Bluffs.” This is problematic for the project proponent because this dry-weather flow may be discharged from the Freshwater Marsh. Estimated dry-weather flows to the marsh are approximately 0.5 to 1 cfs (page 475), however the EIR fails to provide an estimate of dry-weather flows to Ballona Creek Estuary.<sup>4</sup> Clearly, some discharge to the estuary is anticipated because the EIR contains a brief analysis of potential impacts from dry-weather flow. This discharge is prohibited by the municipal stormwater permit. The project should be changed to ensure no dry-weather discharge occurs.

Footnote 4 If the Freshwater Marsh is considered a water of the U.S., as Heal the Bay believes it should since mitigation credits were received, then dry-weather discharges would be prohibited into the marsh itself. See our comment #7b.

### **Response 36-34**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

The legality of the dry-weather flows is not an environmental issue. Notwithstanding, the Los Angeles County public storm drain permit discusses 20 categories of dry weather flows allowed to enter the storm drain system and area waterbodies (Part 1 of the Los Angeles County public storm drain permit, page 16-17). Most notably, these categories of flows include flows from riparian areas and wetlands, and several flows incidental to urban activities. The public storm drain permit tracks U.S. EPA regulations in this regard (40 C.F.R. § 122.26(d)(2)(iv)(B)(1)). (This item is located in the reference library for the Final EIR.) Thus, dry weather flows are not prohibited by the applicable regulations and need not be prohibited by the Applicant. Even though such dry weather flows are allowed by the MS4 Permit, BMPs incorporated into the Proposed Project will minimize any such flows, meaning that dry weather flows of the type allowed by the public storm drain permit are not expected from the Proposed Project at significant levels. (See Subsection 3.4.1.2.3 of Section IV.C.(2), Water Quality, of the Draft EIR on page 472, for a discussion of source control BMPs such as public education, use of vegetation with low water requirements, and irrigation programs emphasizing no excess irrigation.)

Furthermore, to the extent that the commentor is suggesting that the Proposed Project would require a permit for dry weather flows, such a suggestion is inconsistent with statements made by

the RWQCB (Letter to Playa Capital dated January 16, 2003, on page 2-3, attached as an Appendix of the Final EIR and referenced in Note 111 of Appendix F-1 of the Draft EIR.) that requiring separate permits from developments such as the Playa Vista development would “create a permitting morass that is not supported by the Clean Water Act;” and such permitting “for discharges comprised solely of urban runoff” would overlap with the municipal storm water permits without any clear benefit to water quality. Anticipated dry weather flows from the Playa Vista development areas need not be separately permitted.

Dry weather flows from the Westchester Bluffs development are anticipated to be the same type of flows “incidental to urban activities” specifically allowed by the MS4 Permit, and to the extent that they are, they need not be prohibited from entering the Freshwater Marsh or passing through the Freshwater Marsh to the Ballona Channel or Wetlands. To the extent that any dry weather flows from the Westchester Bluffs would require a permit other than the MS4 Permit or would require prohibition under the MS4 Permit, such regulatory authority lies with the jurisdiction of the RWQCB and the City of Los Angeles separate and apart from regulation of the adjacent Playa Vista First Phase Project and Proposed Project.

### **Comment 36-35**

17. It is unclear if the detection limits of available analytical data on existing water quality conditions in the receiving waters were considered in the analysis for the EIR. The EIR should be revised to include discussion on detection limits, and the tables in the water quality section should be revised to include detection limits for any reported sampling results that are compared to regulatory standards such as CTR.

Detection limits can be higher than concentrations of concerns. Detection limits are particularly significant when comparing urban runoff sampling results for organic pollutants to CTR standards. It is unclear whether detection limits were considered when existing water quality conditions were analyzed for the EIR. This analysis is important because the results were used to target pollutants of concern for the impact analysis of the EIR. We believe the EIR did not adequately address organic pollutants such as PAHs and pesticides (see our comments 12, 13, and 14.). This may be in part because the existing water quality data was not adequately evaluated.

### **Response 36-35**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. Further, numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

As noted by the commentor, detection limits of the existing data were not listed in the summary tables in the Draft EIR. Detection limits often varied between the sources researched for the existing data, and some of the sources did not report the detection limits used during their

sampling events. To minimize confusion on the summary tables, the detection limits that were available were not reported on the summary tables. Data compiled for the existing data include sampling data collected from 1990 through 2003. It should be noted that during this time period regulatory criteria and laboratory analytical testing capabilities have changed. The source reports generally provided a review of detection limits appropriate for the date that the original source report was released.

In any case, for constituents where concentrations were detected above the detection limits, the detection limits, while informative, are not crucial for the analysis. However, for constituents where concentrations were not detected above detection limits, the detection limits would indicate whether the detection limit would capture results relative to appropriate regulatory criteria. In the existing data tables in Section IV.C.(2), Water Quality, of the Draft EIR, the constituents not detected above laboratory detection limits included pesticides, selected metals, and all PAHs (with one exception). These constituents were not selected as constituents of potential concern in urban runoff for reasons unrelated to their detection limits. See further Response 36-4, above.

In the context of the Draft EIR, the detection limits for the existing data would not change the level of significance of the impact of the Proposed Project or change the mitigation measures for the Proposed Project. The Proposed Project is required to control stormwater runoff to meet current regulatory water quality criteria and other relevant stormwater controls, such as the SWPPP and the NPDES Stormwater Permit requirements. The Proposed Project has incorporated BMPs and other appropriate mitigation measures to achieve this goal. Please refer to Subsection 3.3 on page 453, for a discussion of the Project design features with respect to water quality, Subsection 3.4 on page 459, for a discussion of the Project impacts, and Subsection 4.0 on page 517, for a description of the water quality mitigation measures.

### **Comment 36-36**

18. BMP measures for trash loading to Ballona Creek Estuary and Ballona Wetlands may be inadequate. The trash TMDL for Ballona Creek sets a limit on the amount of trash that can be discharges [*sic*] to the Estuary and Wetlands. The EIR does not estimate the trash loading from the project or explicitly commit to meeting the requirements of this TMDL.

Although the proposed project contains numerous BMPs to control trash, the EIR did not include any estimates on the trash load that will be discharged to the Freshwater Marsh or from the marsh to the Estuary or Wetlands. Trash is a significant problem in the Ballona Creek watershed--both the Estuary and Wetlands are impaired due to excessive levels of trash. The EIR should be revised to include a more comprehensive analysis of trash removal including estimated removal efficiencies of the various BMPs. The EIR should show that the BMPs will achieve the TMDL trash limit.

**Response 36-36**

Please see Response 36-23, above for a discussion of trash and BMPs implemented to control the trash in runoff from the Proposed Project. As stated therein, while TMDLs do not apply to the Freshwater Marsh, the Proposed Project incorporates BMPs that will comply with the trash TMDL.

**Comment 36-37**

19. Impacts from the discharge of construction dewatering, permanent dewatering to protect subsurface structures, and groundwater remediation activities was completely inadequate in the EIR.

The quality, estimated volumes, and location of discharge of groundwater were not provided in the EIR. The EIR does state that perennial flow in the riparian corridor may be derived, in part, from groundwater discharges. Groundwater discharge to the Freshwater Marsh, Ballona Creek Estuary and Ballona Wetlands is a concern. If the volumes are high, discharges from the riparian corridor may lead to more frequent discharges to the salt marsh and/or Ballona Creek. The impacts of the discharge volume need to be addressed. As discussed in the EIR, near surface groundwater in the vicinity of the project is contaminated primarily by VOCs from historical industrial sources, however, we understand that groundwater treatment units have and will be used to treat the groundwater for these constituents. Heal the Bay is particularly concerned about the naturally-occurring dissolved metals concentrations and TDS levels in the groundwater. Often, naturally-occurring levels of metals in groundwater can exceed CTR limits and TDS levels can be very high. Thus, discharge of groundwater to the freshwater riparian corridor or the freshwater marsh could contribute to poor water quality.

The EIR state NPDES permits have or will be obtained for dewatering discharges to receiving waters. However, merely stating compliance with existing or future permits does not indicate impacts will not occur. The EIR should be revised to clearly provide estimates of volume, quality and discharge locations of all dewatering activities. Impacts to receiving waters should be clearly discussed based on estimated pollutant concentrations. Loadings of pollutants that accumulate in sediment, particularly metals, should be estimated and impacts assessed.

**Response 36-37**

As discussed in Response 36-2, above, the construction of the Freshwater Wetlands System, including the Riparian Corridor, was analyzed in the previously certified First Phase EIR. As such, the source of water for the Freshwater Wetlands System, including the Riparian Corridor, was addressed in the First Phase EIR. As stated in Subsection 2.2.1.5 of Section IV.C.(2), Water Quality, of the Draft EIR on page 434, urban runoff and treated groundwater are potential sources. Numerous governmental agencies including the Army Corps of Engineers, the California Department of Fish and Game, and RWQCB previously analyzed and approved the design of the entire Freshwater Wetlands System.

Anticipated dewatering activities associated with the Proposed Project include temporary construction dewatering and permanent dewatering. As stated in Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 737, prior to issuance of a grading permit or B-Permit for activities involving construction dewatering, evidence shall be provided to the LADBS or LADPW, as appropriate, that a valid NPDES or Industrial Waste Discharge permit is in place. The NPDES or Industrial Waste Discharge permit shall include provisions for evaluating the dewatering discharge for potential contamination, and, if necessary, the need for treatment prior to discharge. Similarly, evidence shall be provided to the LADBS or LADPW, as appropriate, that a valid permit is in place prior to construction and operation of a permanent dewatering system.

Currently, construction dewatering activities in the adjacent Playa Vista First Phase Project are regulated under NPDES Permit #CAG994004, (this item is located in the reference library for the Final EIR) which allows discharges to the storm drain system at three onsite locations, and Industrial Waste Discharge Permit #W-502105, which allows discharges to the sanitary sewer. Either or both of these discharge permits may be used for Proposed Project dewatering. Both permits define the allowable numeric water quality-based effluent limitations for the construction dewatering discharge without consideration of dilution credits. Compliance with Industrial Waste Discharge permit #W-502105 (or future alternative Industrial Waste Discharge permit) ensures that there is no significant impact to the sanitary sewer system. Compliance with NPDES Permit # CAG994004 (or future alternative NPDES permit), the General Storm Water Construction Permit and the related Stormwater Pollution Prevention Plan, the county-wide municipal storm drain permit (each of which incorporate Basin Plan objectives and CTR criteria into the water quality effluent limitations), as well as conformance to the performance standards identified in the mitigation measures discussed above provide mitigation of potential impacts associated with construction dewatering at the Proposed Project.

Permanent dewatering systems to protect subsurface structures (i.e., subsurface parking garages, etc.) that may occur would be “contingent” systems that would operate only as groundwater elevations occur at the level of the dewatering pipes. Drainage pipes will be connected to a sump to maintain the groundwater level at the target elevation. Discharges from these systems are anticipated to be sporadic; however, a conservative analysis, assuming every structure in the Proposed Project would include a dewatering system, suggests that a daily flow of up to 1.8 to 2.4 acre-feet could be discharged from these systems. During summer dry weather, when the Freshwater Marsh is at a 4-foot elevation with a volume of 52.4 acre-feet, these flows would correspond to an exchange time in the Freshwater Marsh of 28 and 21 days respectively without considering other dry weather flows.

In the event the water is discharged to the storm drainage system, it would be subject to the water quality standards included in the NPDES permits for the development, which would be protective of downstream receiving waters. As such, the discharge could not contribute to any impacts on water quality in downstream receiving waters, such as the Ballona Channel. Additionally, the volume of water would help to improve water circulation and maintain good “residence time” within the Freshwater Marsh (i.e., the amount of time water remained in the

marsh prior to being discharged to Ballona Channel). Further, this discharge would not alter the stormwater capacity of the Freshwater Marsh; therefore, it would not result in increased frequency of discharges to the Ballona Wetlands from the Freshwater Marsh. As such, no significant adverse impacts would occur in the event this discharge was routed to the storm drainage system.

In the event the water is discharged to the sanitary sewer system, it would be subject to the provisions of an Industrial Waste Discharge Permit, issued by the City's Department of Public Works. Table 172 of the Draft EIR (Section IV.N.(2), Wastewater, page 1111) demonstrates there is more than adequate capacity in the wastewater conveyance system serving the Proposed Project to carry this discharge to the Hyperion Treatment System (HTS). Additionally, as stated on pages 1111 to 1112 of the Draft EIR, the HTS is anticipated to have sufficient capacity for these discharges, except during peak months, where a deficit capacity of 20 mgd is currently projected to occur within the HTS by 2010, if planned improvements are not implemented. However, similar to the protection ensured by the City's Sewer Permit Allocation Ordinance, the Department of Public Works would not issue an Industrial Waste Discharge Permit without demonstration of sufficient capacity in the HTS to accommodate the discharge. Therefore, because the Proposed Project could not connect to the local wastewater conveyance and treatment system without demonstration of sufficient capacity to accommodate the discharge, no significant impacts to the local wastewater conveyance and treatment system would occur.

Quality of any treated groundwater flowing to the Freshwater Wetlands System will be required to meet applicable standards as determined by the Regional Water Board, as discussed further in Section IV.I, Safety/Risk of Upset, of the Draft EIR, as well as other applicable regulatory requirements set forth in the permits for the Freshwater Wetland System. Meeting these requirements will ensure protection of downstream water quality and aquatic life. Based on the current design, the groundwater treatment facility is anticipated to provide approximately 0.37 cubic feet per second (cfs) to the Riparian Corridor (and, ultimately, the Freshwater Marsh), although it is being designed with the capacity to produce up to 0.44 cfs, if required. As discussed above, the use of this groundwater as a source for the Freshwater Wetland System was addressed in the First Phase EIR.

The Freshwater Marsh is designed to capture the 1-year storm event and route these flows to the Ballona Channel. The dry weather flows, including dry weather runoff and groundwater discharges discussed above, are included within the design volume of the Freshwater Marsh; as such, these discharges will not lead to more frequent discharges to the Ballona Wetlands and/or Ballona Creek.

### **Comment 36-38**

20. Impacts from construction of the project on stormwater were not adequately addressed. Stormwater monitoring and inspection results for construction of First Phase Development should be analyzed as part of this EIR.

The EIR states the existing SWPPP, used for the First Phase Project, will be modified to address the proposed project's construction and that the "existing SWPPP has served effectively in addressing potential short-term water impacts." (page 463). Merely stating that the SWPPP will be adequate is insufficient, particularly given the sensitive nature of Ballona Creek Estuary and Wetlands, the ultimate receiving waters for the project's runoff. Instead, the EIR should include the data the project proponent used to conclude the current SWPPP has been adequate such as any stormwater monitoring data, inspection reports, and other reports generated during the lifetime of the SWPPP.

### **Response 36-38**

As stated in Subsection 3.4.1.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 462, the construction impacts for the Proposed Project will be addressed through administration of the existing SWPPP formulated to provide comprehensive water quality control program for the adjacent Playa Vista First Phase Project construction activities to comply with the General Construction Permit as modified and updated to address Proposed Project construction. The purpose of the SWPPP is to identify the plan for comprehensive water quality control; enforcement, monitoring of effectiveness, and compliance with the mitigation measures is achieved through the Mitigation Monitoring and Reporting Program (MMRP). Please refer to Response 36-7 above regarding the MMRP for the Proposed Project. For a description of technology standards and control measures to be utilized within the SWPPP, please see Response 36-16, above. As the Proposed Project land uses and topography are similar to the adjacent First Phase Project, its construction activities also would be similar to the adjacent First Phase Project. As concluded in the Draft EIR, based upon the implementation of BMPs through the revised SWPPP for the Proposed Project, potential impacts from construction activities will be less than significant. (Subsection 3.4.1.1 on page 463 of Section IV.C.(2), Water Quality, of the Draft EIR.) All reports related to the First Phase Project SWPPP are kept on site, per the General Stormwater Permit requirements, with the SWPPP.

### **Comment 36-39**

In conclusion, Heal the Bay feels that the EIR does not adequately address many critical issues related to biotic resources and water quality. Based on our evaluation of this EIR, we feel that subsequent studies must be performed or additional data analyzed to answer many of the questions raised by our review. In addition, we seek additional clarification with regard to what specific areas received mitigation credit and how the project applicant intends to maintain these habitat areas despite the numerous conflicting uses stated in the EIR. Finally, we request that more detailed information be provided to those issues raised in this letter to enable the accurate determination of impacts related to the Proposed Project.

Given the proximity of the Proposed Project to the Ballona Wetlands, the size of the Proposed Project, and the fact that the Project will develop the last substantial area of open space in the coastal region of Los Angeles County, we feel that the EIR must thoroughly evaluate all potential impacts caused by the Proposed Project. As currently written, the EIR does not achieve this goal.

Please feel free to contact us if you have any questions about our comments.

**Response 36-39**

This comment represents a summary statement and is addressed in Responses 36-1 through 36-38. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 37**

Sherry Marks  
KOREH L.A.  
6505 Wilshire Boulevard, #900  
Los Angeles, CA 90048

**Comment 37-1**

The City of Los Angeles should approve The Village at Playa Vista. Here is why:

- The Village will transform an abandoned airplane landing strip and improve the surrounding area.
- The Village will provide critically-needed housing, at a range of prices.
- The Village will provide retail that serves the neighborhood, not the region.
- The Village will improve roads that have not been touched since World War II.
- The Village will add open space and habitat. Support The Village at Playa Vista!

**Response 37-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 38**

Los Angeles County Bicycle Coalition  
634 South Spring Street, Suite 821  
Los Angeles, CA 90014  
213-629-2142  
213-629-2259 fax  
www.labikecoalition.org

December 22, 2003

**Comment 38-1**

The following comments and recommendations find fault with the above EIR for its lack of analysis of the role that bicycle transportation can play in mitigating environmental impacts created by the Project and the lack of meaningful bicycle facility improvements as a component of the Project's proposed mitigation measures. In determining the significance of the role that bicycle transportation can play, one only has to look at the EIR's findings that a majority of Project-related trips are to destinations within easy cycling distance. However, adequate accommodations must be planned and implemented to facilitate this. We offer recommendations below.

**Response 38-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. This introductory statement is elaborated upon in the following comments, and thus is further addressed in the following responses.

**Comment 38-2****1. COMMENTS ON MITIGATION MEASURES**

(IV. Environmental Impact Analysis, K. Transportation, [1] Traffic and Circulation, 4.0 Mitigation Measures)

**1.1 Mitigation plan must exploit all travel modes**

Automobile congestion reduction measures in the Project vicinity have been largely exhausted. As table 130 (IV. Environmental Impact Analysis, K. Transportation, [1] Traffic and Circulation 5.1.2 Summary of Intersection Impacts) in the EIR shows, the majority of intersections in the vicinity of the project will be at or near their capacity even when proposed mitigations are

completed. It is therefore essential to exploit alternative transportation modes (public transit, cycling and walking) to the fullest extent possible in order to reduce environmental impacts.

### 1.2 Bicycle transportation not included as a mitigation measure

The Project's proposed mitigation measures do not include any significant off site improvements to on-road or off-road bicycle facilities as a means for reducing the Project's environmental impacts. The EIR describes the Project's on-site bicycle facilities and how they might augment regional bike routes (for regional cyclists who are able to access the Project). But there is scant attempt to enhance bicycle connectivity between the project and the surrounding roads and destinations. The EIR is therefore deficient because it has not adequately explored and disclosed the role that bicycle transportation can play in mitigating Project-generated automobile trips.

The EIR only analyzes bicycling in terms of whether the Project will have adverse impacts on existing or planned bicycle facilities (IV. Environmental Impact Analysis, K. Transportation, [3] Bicycle Plan 3.4 Impact Analysis). This limited analysis ignores the potential that additional enhancements to bicycle transportation can have for reducing environmental impacts.

### **Response 38-2**

The commentator states that alternative modes of transportation (public transit, cycling and walking) should be exploited to reduce environmental impacts. As discussed in Subsection 3.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 837 and Subsection 4.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 887, the Proposed Project's design as well as the development of its mitigation program includes the use of alternative modes of transportation.

The development of the design of the Proposed Project and its mitigation measures has been context-sensitive. The improvement program for the Proposed Project includes a balanced set of transportation system enhancements. This mitigation program includes regional bus transit, local intelligent shuttle, signal system enhancements targeted towards both automobiles and transit vehicles, highway/roadway corridor and intersection improvements, and bicycle system improvements. The project design features in addition to the above set of multi-modal system-wide improvements provides a well-connected on-site pedestrian network.

### **Comment 38-3**

Further, the EIR does not examine the adverse impacts that proposed automobile-specific mitigations could have on future bicycle transportation improvements. While it is obviously difficult to analyze impacts on improvements not yet planned, it must be recognized that there is a need to improve bicycle accommodation on most roads in the project vicinity, and mitigation measures that optimize roadway and intersection design for automobiles can compromise opportunities for these bicycle improvements.

**Response 38-3**

Roadway improvements that are required to mitigate impacts of the Proposed Project are summarized and described in Subsection 5.8 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 937. The impacts of implementing those roadway improvements on bikeways is identified in Subsection 3.4.3 of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 963. As indicated, potential impacts would occur at two locations along the Class I Trail on Culver Boulevard: Culver Boulevard at Centinela Avenue and Inglewood Boulevard. At these off-site locations, short-term adverse impacts on the existing bikeway may occur during construction. Mitigation measures are included in Subsection 4.0, Section IV.K(1), Traffic and Circulation, of the Draft EIR, on page 904, to address this potential impact. The long-term integrity of the bicycle trail at these locations would not be disrupted. With the implementation of appropriate mitigation measures during construction, impacts would be less than significant.

**Comment 38-4**

## 1.3 Viability of bicycles as a mitigation measure

According to the EIR, 45-50% of project trips have destinations within three to four miles and as much as 70% of project trips are within five miles.[Ftnt 1] These distances are easily within the comfort range of even novice cyclists. This trip distribution represents a very important opportunity for accommodating many of these trips by bicycling or walking, thereby reducing automobile trips. Indeed, roadways internal to the Project provide many accommodations for cyclists and walkers. A core Project design philosophy is to create a community where bicycling and walking can meet many of the local travel needs of the residents and workers.

[Ftnt 1] IV. Environmental Impact Analysis, K. Transportation, [I] Traffic and Circulation 3.4.4 states: “Approximately 45 to 50 percent of the Project trips have their final destinations within three to four miles of the Proposed Project site. A total of 65 to 70 percent of the trips are completed within five miles. While the study area covers 100 square miles, the majority of the Proposed Project traffic effects occur close to the project site, and the effect drops away quickly farther away from the Project.”

Unfortunately, this philosophy has not been applied in a significant manner as a means to mitigate automobile trips affecting adjacent roads and communities. If bicycle and pedestrian connections to the surrounding roads and destinations are not safe, convenient and inviting, this valuable mitigation cannot be fully realized.

**Response 38-4**

The Proposed Project, as the commentor points out, employs a context-sensitive design philosophy that provides many bicycle and pedestrian network accommodations to serve local travel needs of its residents and workers. By providing this network of facilities and connecting them with the neighboring Playa Vista First Phase Project bicycle and pedestrian

accommodations, the Proposed Project will offer connectivity with the planned Lincoln Boulevard bike path and bike lanes to and from the Westchester Community to the south. For destinations that are in the immediate vicinity of the Proposed Project (including the Fox Hills Mall, The Bridge & Howard Hughes Office and Entertainment Center, Loyola Marymount University, the beach and other uses at Playa del Rey and the commercial uses in Marina del Rey), the Playa Vista intelligent shuttle will provide demand-responsive service to its residents and workers.

### **Comment 38-5**

#### 1.4 Mitigation plan inconsistent with City's Bicycle Plan

The City of Los Angeles' Bicycle Plan Element includes the following objectives:

- To make bicycling, for both transportation and recreation, a safer activity.
- To encourage and facilitate bicycle riding as an important mode of personal transportation as well as a pleasant source of outdoor exercise.
- To identify route locations appropriate for known and potential bicycle trip demand.

This project's transportation planning (which has been assisted by City staff) represents an opportunity for realizing these objectives.

Because the Project's mitigation measures virtually ignore off-site enhancements of bicycle accommodations, it is inconsistent with the City of Los Angeles' Bicycle Plan Element.

### **Response 38-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Pursuant to State CEQA Guidelines, the Draft EIR analyzes the impacts of the Proposed Project and where necessary proposes mitigation measures to address the Proposed Project's impacts. As indicated in Subsection 3.4.1, Proposed Project Impacts, of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 961, the Project's Class II lanes would link with other bikeways, would be compatible with adjacent Playa Vista First Phase Project bikeways and provide enhanced service for the Proposed Project's population, Playa Vista First Phase Project's population and regional travelers passing through the site on their longer journeys. The new bikeways would improve the quality of bikeway service. Thus, the Proposed Project would not interfere with the implementation of any planned bikeways, but would expand upon and complement existing Bike Plans. Therefore, the Proposed Project is consistent with the objectives of the City of Los Angeles Bike Plan.

The proposed transportation mitigation program employs a balanced set of transportation system enhancements as discussed in Response 38-2, above.

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**Comment 38-6****1.5 Meeting the needs of cyclists**

In general, there is a severe shortage of bicycle transportation connectivity to surrounding streets, roads and nearby destinations from the Project. The needs of transportation cyclists are the same as motorists: direct access to destinations by the fastest and most convenient routes possible. Relegating cyclists to a limited subset of roads that require circuitous routing, extra time and effort to reach destinations diminishes the viability of cycling as a transportation mode. Below is a summary of the bicycle accommodation deficiencies of the adjacent roads and destinations and recommendations for improving these routes to take full advantage of this valuable mitigation measure.

**1.6 Bicycle accommodation deficiencies and recommendations****1.6.1 Lincoln Blvd.**

This is the only north-south arterial available at the western end of the project. As such, it is an essential link for connecting the project to the numerous communities and destinations that lie along the Lincoln corridor both north and south, including Westchester, Marina del Rey and Venice (all of which are within the nearby trip destination range of 5 miles or less as noted above).

Inadequacies of Lincoln Blvd. for bicycle transportation include:

1.6.1.1. Bluff Creek Drive is the only route with planned bicycle facilities for accessing Lincoln Blvd. from the project. Significant points of origin within the Project lie sufficiently north of Bluff Creek Dr. to make this an inconvenient route for accessing Lincoln.

Recommendation: Provide additional bicycle access routes to Lincoln Blvd. to serve the various Playa Vista neighborhoods.

1.6.1.2. There is a gap of bicycle facilities on Lincoln Blvd. from Jefferson to Fiji which impairs bicycle access to Marina del Rey, points north and the Ballona Creek trail.

Recommendation: Add bicycle lanes to Lincoln Blvd. between Jefferson and Fiji.

1.6.1.3. Related to the above, the uncontrolled ramps connecting Culver Blvd. to Lincoln create a distinct hazard for northbound cyclists on Lincoln Blvd. who must cross the high-speed merging traffic these ramps create.

Recommendation: Provide a safe means for cyclists to cross the Culver Blvd. ramps. A bicycle/pedestrian bridge should be considered as this would be the safest means possible.

1.6.1.4. There is a gap of bicycle facilities on Lincoln Blvd. between LMU Drive and 83rd St. in Westchester. This is the final leg for cyclists wishing to reach Westchester communities. Destinations include the popular commercial stretch of Lincoln Blvd. between 83rd and Manchester, Otis College, the Furama Hotel and adjacent neighborhoods. Routing cyclists circuitously through the private LMU campus is not a viable strategy.

Recommendation: Provide bicycle accommodation on Lincoln Blvd between LMU Drive and 83rd St., either class II bike lanes or wide curb lanes of sufficient width to permit safe parallel travel of bicycles and cars. Assure that signal detector loops are sensitive to bicycles. Design intersections so as to provide cyclists safe and convenient on-road passage through them.

#### 1.6.2 Jefferson Blvd.

This is the primary existing East West arterial close to the Project. Besides having numerous employment, retail and residential destinations on or just off of it, it serves as the primary road connecting the project to destinations to the east and west. While some of the Project's internal roads planned to incorporate bicycle facilities are roughly parallel to Jefferson, they do not provide convenient direct access to destinations on Jefferson.

Recommendation: Provide bicycle accommodations on Jefferson Blvd between Vista del Mar and Sepulveda Blvd., either class II bike lanes and/or wide curb lanes of sufficient width to permit safe parallel travel of bicycles and cars. Assure that signal detector loops are sensitive to bicycles. Design intersections so as to provide cyclists safe and convenient on-road passage through them.

#### 1.6.3 Centinela Avenue and Inglewood Boulevards.

These are two important secondary north-south arterials that terminate near the Playa Vista project. In addition to having commercial and residential destinations along them, they provide well-spaced connectivity from the Project to points north, including to the existing Class II bike lanes on Venice Blvd. Despite the important role they are able to play, both presently have sections that are challenging for cyclists.

Recommendation: Provide bicycle accommodations on Centinela Avenue and Inglewood Blvd. between the Project boundary and Venice Blvd., either Class II bike lanes or wide curb lanes of sufficient width to permit safe parallel travel of bicycles and cars. Assure that signal detector loops are sensitive to bicycles. Design intersections so as to provide cyclists safe and convenient on-road passage through them.

#### 1.6.4 Ballona Creek Trail (Trail)

This is the only east-west Class I bike path near the Project. It is widely utilized by both transportation and recreational riders. It provides access to the southern area of Marina del Rey on the west and the Baldwin Hills Recreation Area on the east (it does NOT however, eliminate the need for on-road bicycle access to destinations in these areas). When the Exposition Light

Rail Line Phase One is completed, the Trail will provide direct access to the station planned near La Cienega. Despite the close proximity of the trail to the Project, under current planning, access to it from the Project is very limited.

Recommendation: In concert with the above recommendations for Lincoln, Centinela and Inglewood boulevards, preserve and enhance access ramps from these streets to the Trail.

Recommendation: Utilize the maintenance/fire road on the southern bank of the Ballona Creek as a bicycle pedestrian trail that can connect to the Ballona Creek Trail via Centinela Ave. and other streets as necessary.

### 1.6.5 Westchester and LMU

The neighborhoods of Westchester and Loyola Marymount University lie immediately south of the Project, yet are severely isolated by a lack of convenient bicycle and pedestrian connections. Presently, cyclists and walkers must travel to either Lincoln or Sepulveda Boulevards (at the extreme ends of the Project) in order travel between Westchester and the Project.

Recommendation: Develop Cabora Road, which parallels the project along the base of the Westchester Bluffs, as a bicycle/pedestrian trail that can connect to the existing and possible future trails up the bluff. Two such trails now exist: one that descends from the northern terminus of Dunbarton Street and another, currently inactive, that descends from near LMU's new student housing. Such a Cabora Road trail should have convenient access points to it from the Project.

### Response 38-6

These comments describe a number of recommended improvements to the regional bicycle bikeway system. These improvements do not serve to mitigate any significant impacts identified in the Draft EIR, and are not required to mitigate any significant Proposed Project impacts to the bikeway system. The Draft EIR does provide information on the regional system, as illustrated in Section IV.K.(3), Bicycle Plan, of the Draft EIR in Figure 82 on page 957, and new linkages being provided between LMU Drive and Jefferson Boulevard.

The comment stating that Bluff Creek Drive is the only route for accessing Lincoln Boulevard from the Project and that significant points of origin within the Project lie sufficiently north of Bluff Creek Drive to make this an inconvenient route for accessing Lincoln Boulevard raises a number of issues. First, the request of additional bicycle access routes to Lincoln Boulevard to serve the various Playa Vista neighborhoods would require the reconfiguration of the roadway network within the previously approved Playa Vista First Phase Project. The First Phase Playa Vista Project was addressed in a separate EIR (EIR No. 90-0200 SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995, and is not under consideration at this time. Second, as shown in Section IV.K.(3), Bicycle Plan, of the Draft EIR in Figure 84 on page 962 of the Draft EIR, several



north-south bicycle connections to Bluff Creek Drive are included within the Proposed Project, providing convenient access to Bluff Creek Drive from all locations within the Proposed Project. In addition to Bluff Creek Drive, the Proposed Project would have on-site access from areas that lie to the north of the site to Lincoln Boulevard via Class II Bicycle Lanes on Runway Road and Millennium parallel to Bluff Creek Drive. To access Runway Road and Bluff Creek Drive within the Project site, on-site bike lanes are being provided along McConnell Avenue, 2nd Street and Westlawn Avenue, thereby making them convenient routes to Lincoln Boulevard.

The other comments relate to recommendations for bicycle accommodations along Lincoln Boulevard, Jefferson Boulevard, Ballona Creek Trail, Cabora Road as a bicycle and pedestrian trail, Westchester & LMU areas. These improvements do not serve to mitigate any significant impacts identified in the Draft EIR, and are not required to mitigate any significant Proposed Project impacts to the bikeway system. The Draft EIR does provide information on the regional system, as illustrated in Section IV.K.(3), Bicycle Plan, of the Draft EIR in Figure 82 on page 957.

### **Comment 38-7**

## **2. COMMENTS ON PUBLIC TRANSPORTATION**

The Project Planners are to be commended for proposing numerous significant mitigation measures involving public transit. Through proposed investments of significant levels and creative approaches they could bring numerous needed enhancements to this underdeveloped transportation mode and significantly improve services to transit users. Despite these welcome efforts, the Playa Vista development as a whole still remains what some have characterized as transit-oriented development without the transit. It will be a compact, walkable, mixed-use community with many desirable amenities but with limited and circuitous access to regional transit. While the implementation of an internal shuttle is a creative and impressive travel option, there will still be no public transit lines coming into the project area. Accessing public transit will always require at least one transfer or a trip by another mode. One of the highest value destinations, LAX, is actually quite close by. But a trip there by transit will require a minimum of two transfers to get to the terminals. For these reasons it is all but assured that public transit use will play a very minor role in meeting the travel needs of Playa Vista residents and workers. This is extremely unfortunate because projects of this scale should offer solutions for providing viable, inviting travel options that can help prepare our region for a future where growing pollution, congestion and diminishing energy resources will be critical issues.

### **Recommendations:**

2.1. Contribute funds to an account reserved for future high-capacity transit in the project vicinity.

2.2. Provide regular or on-demand direct-to-terminal transportation to LAX.

2.3. Provide inviting, sheltered transit stops with secure bicycle parking at the western end of the project for travelers accessing transit on Lincoln Blvd.

2.4. Provide funds for enhancing the Fox Hills Transit Center so that it provides better shelter, kiosks, amenities, secure bicycle parking, etc.

### **Response 38-7**

The commentator states that the Proposed Project has limited and circuitous access to regional transit. In fact, two of the three lines proposed for improvement under the Project's mitigation program (Culver City Lines 2 and 4) would travel adjacent to the Proposed Project and would be accessible by walk. They would not necessitate a transfer.

The proposed improvements would include a limited stop service that could be used to access LAWA administrative offices, downtown Westchester, and offices and LAX ancillary uses along Century Boulevard with no need to transfer. For trips where a transfer is necessary, the proposed intelligent shuttle system, a demand-responsive system with Next-Bus technology allows for coordinated and timed transfers.

Please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455 for a discussion on the transit planning process and the considerations taken into account in the development of this Plan. Also, please Refer to Appendix K-2, pages V-4, V-5, V-6 and V-7, of the Draft EIR, for information on the Proposed Project's contributions or provisions relative to mass transit improvements.

The commentator's suggestions relative to providing sheltered transit stops with secure bike parking on the western end of the Playa Vista site relates to the Playa Vista First Phase Project area and will be forwarded to the decision makers for further consideration. Improvements to the Fox Hills Transit Center are not required to mitigate Project impacts.

### **Comment 38-8**

### **3. COMMENTS ON SECONDARY IIMPACTS OF AUTOMOBILE-RELATED MITIGATIONS TO THE VITALITY OF SURROUNDING COMMUNITIES.**

Automobile trips anticipated to be created as a result of the Project carry direct environmental impacts. Of course these impacts should be mitigated if possible, but the negative impact of the mitigations themselves and the extent of their long-term benefits must be weighed against any near-term advantages to be gained by enhancing automobile capacity.

Examples exist of mitigations underway for Playa Vista Phase One that disregarded secondary impacts at the time they were approved and which now will seriously compromise goals for community revitalization. It is instructive to look at one example in particular: the planned widening of Lincoln Blvd. between LMU Drive and La Tijera Blvd. This extraordinary attempt to add one additional northbound lane will require reducing sidewalks widths to nearly the legal

minimum and lane widths to the very minimum Caltrans' standards. This widening to enhance automobile through-put will take place in an area of numerous popular restaurants, shops, significant pedestrian activity, and well-used transit stops. It is an area targeted by the community for revitalization to enhance its role as a close-by shopping and dining destination. The resulting mitigation will compromise the pedestrian environment, diminish opportunities for streetscape beautification and negatively impact business vitality. Bicycle access to destinations on this stretch of Lincoln will be far more difficult after the widening is completed. Clearly, the goals for this community center will be compromised in order to mitigate traffic impacts. This is a mistake that should not be repeated.

#### Recommendations:

3.1 Automobile related mitigation measures should be carefully evaluated and designed taking into account the context of the place in which they are proposed. This is often called "Context Sensitive Design" and it is a practice promoted by the Federal Highway Administration. An analysis should be done on the secondary impacts that automobile-related mitigations will have on community goals related to enhancing adjacent land uses, walking, bicycling, public transit, impacts on local businesses and nearby residents. Again, this is about the impact of the mitigations.

3.2 Traffic mitigation measures that affect the vitality of the community must substantially involve stakeholders in their planning BEFORE they are included in an approved mitigation plan. Impacts on surrounding communities must be thoroughly disclosed for examination by the community and altered accordingly before they get "lock in" as conditions for project approval as part of the EIR.

#### **Response 38-8**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The impacts of the mitigation measures, particularly those referred to by the commentor, have been addressed in detail throughout the environmental issue areas analyzed in the Draft EIR under the Subsection heading "Impacts of Off-site Improvements." The Draft EIR addresses the impacts of specific individual mitigation measures and impacts associated with transit, signal system and construction. The Draft EIR, inclusive of the impacts of off-site improvements, was circulated for a 120 day public review period during which the public could review and comment on the Project and Draft EIR. Comments received are incorporated into this Final EIR for review and consideration of decision makers. Additional opportunities for comment and discussion will occur during the public hearings and entitlement process for the Project.

The commentor's reference to automobile-related mitigation measures designed to be context-sensitive has been applied in the development of the design of the Proposed Project as well as the mitigation program for the Proposed Project. The mitigation program is a balanced improvement

program with regional transit, local shuttle, signalization, highway/roadway intersection and bicycle improvements.

**LETTER NO. 39**

National Resources Defense Council  
Joel Reynolds  
1314 Second Street  
Santa Monica, CA 90401

December 22, 2003

**Comment 39-1**

On behalf of the Natural Resources Defense Council (“NRDC”) and its members, we submit these brief comments on two related aspects of the Draft Environmental Impact Report (“DEIR”) for Phase II of the Playa Vista project—the Village at Playa Vista—located on Parcel D south of Jefferson Boulevard east of Lincoln Boulevard.<sup>1</sup> Founded in 1970, NRDC is a national environmental advocacy organization with offices in Santa Monica, New York, Washington, D.C., and San Francisco and a membership of over 600,000 nationally, including over 120,000 members in California. NRDC has previously submitted comments with regard to the Playa Vista project and strongly advocated for public acquisition of portions of the Ballona Wetlands and surrounding property, which was successfully completed last week.

Footnote 1      Regarding the full range of potential impacts, we wish to incorporate by reference the comments submitted by other commenters, including, but not limited to, Heal the Bay and the Ballona Wetlands Land Trust.

**Response 39-1**

The comment provides background information on the letter submittal. More specific comments with responses follow.

**Comment 39-2**

Specifically, we write to register our particular concern regarding the impacts of the proposed project on air quality and traffic circulation, both in the region as a whole and the immediately adjacent communities. There is no dispute that, in the operation phase, weekday air emissions will exceed SCAQMD significance thresholds for CO, NO<sub>x</sub>, PM<sub>10</sub>, and ROC and will have a significant impact in the basin notwithstanding planned mitigation. Nor is there any reasonable dispute that the project will aggravate congestion at scores of already significantly congested intersections in virtually all directions from the project site. Fundamental to the project response to these concerns is the expectation that an appropriate jobs-housing balance will emerge during the operation of the proposed project, reducing over the long term the adverse impacts that the proposed project will have.

We do not believe that the DEIR adequately addresses these issues or presents a persuasive and credible analysis of the extent of the likely impacts. Given the significance of the air quality burden on already deteriorated air quality in the basin and the overburdened capacity of the transportation arteries in the region of the project even without the proposed project, we believe that further analysis is required, both in order to understand the actual impacts of the project and to provide a basis for confidence in the objectivity of the document's conclusions.

### **Response 39-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As noted by the commentor, the Proposed Project has the potential to impact a number of already-congested intersections. Please note, however, that the analysis methodology and evaluation criteria used to assess air quality impacts in the Draft EIR related to the construction and ongoing operations of the Proposed Project is consistent with the methodologies identified in the SCAQMD's CEQA Air Quality Handbook, which is advocated for use by the SCAQMD. In addition, the SCAQMD reviewed the air quality analysis performed for the Proposed Project and expressed no material concerns regarding the modeling assumptions, analysis methodology or analytic conclusions.

In particular, the SCAQMD comment letter (Comment Letter No. 18) states: "Review of the DEIR indicates that, with a few minor exceptions identified below, the methodologies used to analyze construction and operational air quality impacts are consistent with the methodologies identified in the SCAQMD's CEQA Air Quality Handbook or advocated for use by the SCAQMD. In addition, the SCAQMD commends the lead agency for voluntarily including a localized air quality analysis consistent with the localized significance threshold methodology adopted by the SCAQMD's Governing Board at its October 3, 2003 public hearing."

The comment speaks to the issue of jobs/housing balance, which will reduce over the long term the adverse impacts of the Proposed Project. The Draft EIR addresses the potential effects of the jobs/housing benefits of placing more residential units in an area already rich with jobs (i.e., the Los Angeles west side). Page IV-7 of Appendix K-2 of the Draft EIR calculates the average trip length of project trips. The information shows that the overall average trip length for the Proposed Project is 5.52 miles. This number should be compared to 8.77 miles, which is the average overall trip length for all trips in the SCAG region.<sup>4</sup> Based on the fact that jobs in the area are closer to the proposed housing in the Proposed Project, average trip lengths to/from the Proposed Project are estimated to be reduced by almost three miles per trip (a reduction of 33 percent) when compared to the average trip length in the remainder of the region.

It should be pointed out that the air quality analysis summarized in the Draft EIR did not base its conclusions on the reduced trip lengths discussed above, but rather took the conservative

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<sup>4</sup> *1997 Model Validation and Summary, Regional Transportation Model, Southern California Association of Governments, 1997.*

approach of using the regional default values included in the air quality models. Thus, the air quality analysis in the Draft EIR does not reflect the lower average trip length of project trips and, therefore, presents a conservative analysis of the air quality impacts of the Proposed Project.

In terms of the Project's design and the reduction of air emissions, jobs/housing balance is but one of many means by which Project design features and/or mitigation measures translates to a reduction in emissions. For example, Subsection 3.3 of Section IV.B., Air Quality, of the Draft EIR on page 294, outlines several additional ways in which project design features of the Project would reduce air emissions. These features include: mixed use development, retail uses scaled to serve the community, location of office uses, commercial retail uses near office uses, inclusion of civic uses, transit system improvements, bicycle use promotion, pedestrian facilities and recreation and open space. Complementing these Project design features are a number of air quality and traffic mitigation measures that also serve to reduce air emissions. The air quality and traffic mitigation measures are set forth in Subsection 4.0 of Section IV.B., Air Quality, and IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 332 and 887, respectively. In terms of innovative air quality mitigation measures, as an example, the commentor is directed to the Project's Tier II measures. These measures create the framework wherein future advances in emission reductions, beyond what is known today, would be incorporated into the Project. In essence, the Applicant has accepted a requirement to impose air emission reduction strategies on future development that would be developed through buildout of the Project. In addition to this commitment, the evaluation of the Project's air quality emissions needs to be considered in a broader context.

SCAG is forecasting that the City of Los Angeles is going to grow by nearly 350,000 people and over 130,000 households between 2000 and 2010. Based on these forecasts, a tremendous amount of new housing needs to be constructed over just a 10-year period. With the need for approximately 13,000 housing units a year, the issue shifts from one which focuses upon whether development should occur to one which focuses upon what is the best type of development in terms of minimizing air emissions. Generally speaking, a specified amount of growth can occur in the form of a series of small individual projects or in larger consolidated projects such as the Proposed Project. On the one hand, while the development of small projects taken individually may not result in exceedances of the SCAQMD's air emission significance thresholds, they also lack the size, or critical mass, to effectively implement innovative emission control strategies which would ultimately contribute to the attainment of federal criteria pollutant standards at the earliest practicable date. On the other hand, a project such as the Proposed Project, because of its size results in significant regional air emission impacts (i.e., the significance thresholds are based on absolute total emissions rather emissions per dwelling unit), and provides opportunities, such as those described above, to advance the need to reduce pollutant emissions from a broader perspective. It is also important to note that the SCAMD forecasts compliance with criteria pollutant standards with the magnitude of growth identified above. As such, developments such as the Proposed Project contribute to accelerating the achievement of the air quality standards at an earlier date and in so doing realize a number of secondary and tertiary benefits that are recognized as being desirable to the community at large.

The Draft EIR provides a detailed analysis of employment and the jobs/housing balance, per CEQA Section 15126.2, in Subsection 3.0 of Section IV.J, Population, Housing and Employment, on pages 771 and 774, respectively. Page 774 of the Draft EIR indicates that the “jobs/housing balance issue relates to the availability and location of employment and housing opportunities for residents of the Southern California region. The availability of jobs and housing within proximity to one another provides people an opportunity to live closer to their places of work, and thus benefit from reduced travel time. The community benefits from reduced traffic and congestion, which in turn leads to reduced levels of noise, air pollution and fuel consumption.”

The Draft EIR concludes in Subsection 3.4.5 of Section IV.J, Population, Housing and Employment, on page 774 that “the Proposed Project would be consistent with the SCAG RCPG policies relating to jobs/housing balance by supporting housing growth in housing-poor, jobs-rich subregions (such as the City of Los Angeles). The ratios of jobs/housing in the Local Area, City of Los Angeles subregion, and Regional Area are projected by SCAG to be 2.76, 1.30 and 1.38 in the year 2010, respectively. As the number of jobs exceeds the number of housing units, these areas would be considered to be jobs-rich. By comparison, the Proposed Project provides a greater proportion of housing, with a relative housing-rich ratio of 0.45 jobs per housing unit. Overall the jobs/housing ratio in the six-county SCAG region is projected to be 1.36 in the year 2010. The Project would have a beneficial and, thus, a less-than-significant impact on the jobs/housing balance by reducing the jobs-rich ratios of the Local Area, City of Los Angeles Subregion and Regional Area.”

### **Comment 39-3**

For example, given the widely recognized under capacity of Lincoln Boulevard, leading already to extensive delays virtually every week day for extended periods of time, the EIR should analyze project impacts at each major intersection along that critical artery, from Jefferson to the Santa Monica Freeway. In the communities immediately surrounding the site, each intersection should be analyzed, including, for example, Fiji, Mindanao, and Maxella, through and beyond Venice Boulevard. This analysis should conservatively assess the potential increased number of vehicle trips, as well as consider the full range of mitigation needed to address the existing and anticipated circulation problems in these communities.

### **Response 39-3**

See Topical Responses TR-1, Playa Vista Transportation Model, and TR-7, Study Intersections, on pages 445 and 463, respectively, for a detailed discussion of the transportation model, intersection selections and study area geographic scope.

Figures 4-5 and 4-6 on pages IV-7a through IV-7j of Appendix K-2 show the flow of project trips. This traffic flow was used to select project intersections and verify that the key intersections were indeed selected for study.



It should be noted that the intersections of Lincoln Boulevard with Fiji Way, Mindanao Way, and Maxella Avenue are study intersections evaluated in the Draft EIR (See Figure 65 in Subsection 2.2.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 809). In addition, a total of seven intersections along Lincoln Boulevard north of Washington Boulevard were analyzed as part of the traffic impact analysis for the Village at Playa Vista project: Lincoln Boulevard/Venice Boulevard, Lincoln Boulevard/Rose Avenue, Lincoln Boulevard/Ocean Park Boulevard, Lincoln Boulevard/Pico Boulevard, Lincoln Boulevard/I-10 eastbound ramps, Lincoln Boulevard/I-10 westbound ramps, and Lincoln Boulevard/Wilshire Boulevard. The Draft EIR determined that the Proposed Project would have a significant impact at Lincoln Boulevard/Venice Boulevard before mitigation, but would not have significant impacts at the intersections north of Venice Boulevard.

The analysis did conservatively assess the potentially increased number of vehicle trips as described in pages IV-2 through IV-5 of Appendix K-2 and as verified on page 2 of the LADOT Assessment Letter (Appendix K-1).

#### **Comment 39-4**

The basis for the assumptions regarding the direction of vehicle trips originating from the site—including the assumption that only a quarter of the vehicle trips will follow Lincoln Boulevard north—should be fully explained using, to the maximum extent possible, up to date empirical data rather than standard industry models.

#### **Response 39-4**

The transportation model used in the Draft EIR traffic analysis was based on the SCAG Regional Model and was focused to provide additional detail for the project study area. The actual calibration of the model to verify the distribution of trips and assignment of traffic to the street system was based on hundreds of new traffic counts conducted within the study area from 1999 to 2003. Thus, the model was calibrated on actual empirical data from on-the-ground counts, as requested in the comment.

See Topical Responses TR-1, Playa Vista Transportation Model , and TR-2, The Village at Playa Vista Trip Distribution on pages 445 and 451, respectively, for further information on the development of the transportation model and the distribution of project trips.

#### **Comment 39-5**

Similarly, impacts on the 405 Freeway should be updated with current vehicle trip estimates. The freeway operation conditions set forth in Table 116 do not appear to reflect the current reality of freeway gridlock. For example, for the southbound direction on the 405, the DEIR indicates that capacity north of Venice Boulevard is not reached in either the AM or PM, while in fact bumper-to-bumper traffic is a given during those periods every weekday.

**Response 39-5**

The Draft EIR uses freeway conditions based on data obtained from Caltrans that was adjusted using growth factors from the Los Angeles County 2002 Congestion Management Plan (CMP). The 2003 baseline conditions were forecast using Caltrans data from 2001 (the latest data available at the time of the analysis). The 2003 baseline conditions reflect a higher daily volume than the recently published 2002 Caltrans highway volume data. The data in Table 116 on page 822 of the Draft EIR indicates that the northbound I-405 north of Venice Boulevard operates at level of service F in both the A.M. and P.M. peak hours. The southbound segment operates at LOS D and E in the A.M. and P.M. peak hour, respectively. Recently obtained data from Caltrans for 2002 (as shown in the attached table) confirms the Draft EIR data is consistent with most recent counts.

**Comment 39-6**

Along the 10 Freeway, the DEIR fails to reflect the full extent of the daily reverse directional flow—east in the PM and west in the AM—leading to traffic jams virtually every day. Again, the bases for the DEIR's assumptions on these and other trip estimates should be spelled out clearly and grounded in up-to-date empirical data rather than standard industry models.

**Response 39-6**

The volumes for the I-10 freeway are presented on Table 116 on page 822 of the Draft EIR. These volumes are based on empirical ground counts obtained from Caltrans from these freeway segments and were adjusted using growth factors from the Los Angeles County 2002 Congestion Management Plan (CMP). As such, the actual ground conditions for these freeway segments are accounted for in the data presented in Table 116. Also, see Response 39-5.

**COMPARISON OF FREEWAY DAILY TRAFFIC VOLUMES**

<b><u>Freeway Route</u></b>	<b><u>Location</u></b>	<b><u>2000 Daily Volumes<sup>1</sup></u></b>	<b><u>2001 Daily Volumes<sup>2</sup></u></b>	<b><u>2002 Daily Volumes<sup>3</sup></u></b>	<b><u>2003 Daily Volumes<sup>4</sup></u></b>
I-405	s/o I-110 Fwy	261,000	263,000	265,000	265,900
I-405	at Redondo Beach Bl.	239,000	245,000	243,000	247,700
I-405	n/o La Tijera Bl.	275,000	293,000	294,000	298,000
I-405	n/o Venice Bl.	304,000	304,000	301,000	309,200
I-405	s/o Mulholland Dr.	270,000	270,000	276,000	274,600
SR 90	w/o I-405 Fwy	76,000	77,000	74,000	78,300
I-10	Lincoln Bl.	170,000	147,000	153,000	149,500
I-10	e/o Overland Av.	265,000	257,000	258,000	261,400
I-10	e/o La Brea Av.	276,000	290,000	293,000	294,900
I-105	e/o Sepulveda Bl.	90,000	82,000	82,000	83,400
I-105	e/o Crenshaw Bl.	242,000	242,000	243,000	246,100

Source:

<sup>1</sup> 2000 Volumes on State Highways, Caltrans, 2001.

<sup>2</sup> 2001 Volumes on State Highways, Caltrans, 2002.

<sup>3</sup> 2002 Volumes on State Highways, Caltrans, 2003.

<sup>4</sup> Village at Playa Vista Draft EIR, 2003 projected volumes, based on application of growth factors applied to 2001 Caltrans volumes, used to determine peak hour volumes shown in Table 116, on page 822 of the Draft EIR.

### **Comment 39-7**

Independent analysis of, and proposals to address, the problems associated with Lincoln Boulevard traffic should be considered and discussed. For example, the Lincoln Corridor Task Force has for some time been studying options to reduce congestion along this important artery and may have developed potential solutions that could be incorporated into the mitigation program for the proposed project. Although there should also be other contributors to any implementation program recommended by the task force, the significant impact of this project—both Phases I and II—clearly dictates that all feasible mitigation be required as a condition of approval, including mitigation contemplated as part of broader efforts to address congestion on Lincoln Boulevard.

### **Response 39-7**

With implementation of the mitigation program discussed in the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR on page 216, the Proposed Project would not have any significant traffic impacts. Nevertheless, as discussed on page 7 of Appendix K-1 of the Draft EIR, in the event the Lincoln Corridor Task Force adopts a set of regionally superior traffic

improvements that are equivalent or superior in mitigating the project-related traffic impacts of the Proposed Project, prior to implementation of the Proposed Project or its mitigation measures, the City may require the Proposed Project to contribute toward the implementation of the Task Force's improvements in an amount not greater than the Project improvements being superceded.

### **Comment 39-8**

Air quality monitoring data from the West LA monitoring station for CO, NO<sub>x</sub>, and ROC and the Hawthorne station for PM and SO<sub>x</sub> are questionable, although perhaps consistent with SCAQMD practice. Because the climatic conditions in those areas may differ significantly from the project site, where air quality is consistently influenced by increased moisture from fog and low clouds, the EIR should augment its analysis with monitoring data from more comparable locations, including, for example, LAX. Because, according to the SCAQMD, air quality in the basin has begun to worsen, the air quality analysis must be updated to reflect the most current data available and the latest projections for air quality during the operation of the project.

### **Response 39-8**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The air quality analysis presented in the Draft EIR reflects the most current data available and the latest projections for air quality during Project operations. As stated in Subsection 2.2.2.2 of Section IV.B, Air Quality, of the Draft EIR on page 283 "based on consultation with SCAQMD staff, the monitoring station most representative of existing air quality conditions in the area of Playa Vista is the West Los Angeles Monitoring Station..." Since PM and SO<sub>x</sub> are not monitored at the West L.A. Monitoring Station, data from the nearest monitoring station (Hawthorne) were also used. In addition, the background carbon monoxide (CO) concentration levels used to conduct build-out year analyses are in fact the latest projections as provided by the SCAQMD. Finally, as noted above in Response 39-2, the SCAQMD reviewed the air quality analysis performed for the Village at Playa Vista and expressed no material concerns regarding the modeling assumptions, analysis methodology or analytic conclusions.

The commentator's suggestion that ongoing criteria pollutant monitoring is conducted at LAX is not accurate. Ongoing data collected at LAX is limited to meteorological data such as temperature, barometric pressure, humidity, wind speed/direction, etc. During a brief time period (from August 1997 through March 1998), Los Angeles World Airports (LAWA) conducted on-site monitoring for criteria pollutants CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>10</sub> as part of their LAX Master Plan baseline analysis. However, there has not been any collection of criteria pollutant data at LAX at this time.

**Comment 39-9**

While we agree that the project's impacts on air quality and traffic may be reduced by an effective jobs-housing balance, it is not clear from the DEIR that such a balance can be achieved without additional analysis, planning, and outreach. The DEIR does not present an adequate analysis, for example, of how this goal will be reached, where the needed jobs are likely to come from, why it can be assumed that future residents will work near to the site rather than continuing to work in locations elsewhere in the basin, or what measures will be undertaken to ensure that the workforce residing at the project will match appropriately with employment opportunities on site or in adjacent communities. Particularly in light of current economic conditions, it is entirely unclear where and when the anticipated job opportunities will materialize in and around the project site.

**Response 39-9**

The analysis of the Project's environmental impacts in the Draft EIR do not incorporate the environmental benefits attributable to the Project's positive impacts with regard to jobs/housing balance. The Draft EIR provides a detailed analysis of employment and the jobs/housing balance issue in Subsection 3.0 of Section IV.J, Population, Housing and Employment on pages 771 and 774, respectively. The jobs/housing ratio issue is addressed in Response 39-2, above. The positive environmental benefits of jobs/housing balance are acknowledged by SCAG and incorporated into their regional plans, the most recent of which is the 2004 Draft Regional Transportation Plan (RTP). This plan achieves its objectives through the implementation of key strategies such as concentrating employment in mixed-use centers, a regional jobs-housing balance and inter-county transit. It also maximizes mobility and accessibility within the anticipated 2030 transportation systems and improves air quality by encouraging mixed-use growth patterns that complement and enhance our current and planned transportation investments.<sup>5</sup>

SCAG has shown through their research that segregating land uses and building in outlying areas degrades our quality of life. Specifically, SCAG states "by relegating the bulk of the Region's new housing to outlying bedroom communities, the ratio of subregional jobs to housing has worsened, lengthening commutes, taking commuters' time away from communities and families, and degrading mobility and air quality."<sup>6</sup>

Compared to baseline conditions, the 2004 RTP would increase mobility, decrease congestion and increase auto and transit accessibility while increasing population and employment opportunities.<sup>7</sup> For example, while population would grow to 22,890,100 and employment would increase by 368,800 jobs with the implementation of the 2004 RTP, vehicle miles traveled (VMT) would decrease by 18 million. Based on this data it can be reasonably concluded that the

<sup>5</sup> SCAG, *Destination 2030, Draft 2004 Regional Transportation Plan*, page 81.

<sup>6</sup> SCAG, *Destination 2030, Draft 2004 Regional Transportation Plan*, page 21.

<sup>7</sup> SCAG, *Destination 2030, Draft 2004 Regional Transportation Plan*, pages 120-127.

Proposed Project, with its stated objectives of in-fill and providing housing in a jobs-rich location, would have similar benefits as 2004 RTP implementation. Therefore, the Proposed Project can be expected to increase mobility, decrease congestion and increase auto and transit accessibility while increasing population and employment opportunities.

Furthermore, the Draft EIR addresses livable communities in Section II.C, Project Objectives, on page 171. Consistent with the RTP, the design of the Proposed Project has integrated the policies and ideas of “smart growth” or creating livable communities by addressing the relationships between land use, transportation and air quality.

### **Comment 39-10**

Because of the importance of air quality and traffic impacts to the quality of life in and around the project site as well as in the broader surrounding region, we urge that further analysis be undertaken both to assess the impacts of the project and to identify and implement additional mitigation measures. Thank you for your consideration of these comments.

### **Response 39-10**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 40**

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**Comment 40-1**

Southern California Gas Co. (SCG) appreciates the opportunity to review and respond to the Village at Playa Vista Draft EIR. We respectfully request that the following comments be incorporated in the second draft of the EIR.

SCG recommends including a discussion of activities associated with the extension of new service. At present the draft EIR only briefly mentions the existence of nearby transmission lines as well as a 6-inch service line, which extends into the proposed project site. This discussion should include:

- The presence and condition of existing infrastructure, including right-of-ways and/or easements,
- The number and description of any new equipment that will have to be constructed/installed, in order to provide service,
- Identification and description of any temporary areas required for construction and/or staging,
- Identification of actions that would require permitting or acquisition of new right-of-ways.

A detailed discussion of these issues, including specific environmental impact analyses related to these activities, may help to reduce the time and cost associated with the extension of new service.

We appreciate the opportunity to comment on this document. If you have any questions, please feel free to contact me at (213) 244-5817 or Jaeyi@semprautilities.com.

**Response 40-1**

The extension of new service to the Proposed Project will occur in a manner similar to that which has occurred with, and continues to proceed in, the adjacent Playa Vista First Phase

Project. As indicated in Section IV.M, Energy, of the Draft EIR, existing Southern California Gas Company (SCGC) facilities are located at and near the Project site, including the 6-inch service line that extends into the site. The condition of the existing facilities can be categorized as either newly installed in conjunction with the adjacent First Phase Project and, therefore, only a few years old, or facilities existing prior to the First Phase Project and, therefore, of various ages and conditions as maintained by (SCGC). Similar to what has occurred in the development of the adjacent Playa Vista First Phase Project, the development of the Proposed Project will include the installation of new gas service lines that connect to existing service lines, such as the 6-inch service line, that will be located within new public right-of-ways. These right-of-ways will occur in conjunction with new public streets to be developed within the Project site. Similar to the adjacent Playa Vista First Phase Project, only the extension of service lines is anticipated to be required for the Proposed Project. No other notable types of new equipment related to natural gas service are expected.

As a large undeveloped property, development of the 111-acre Project site will include several construction staging areas, which should be suitable for use by (SCGC) relative to the installation of new service lines.

Based on the nature of (SCGC) facilities anticipated to be required for the Project (i.e., extension/installation of service lines) and the open undeveloped nature of the Project site, it is not anticipated that actions requiring permitting or acquisition of new right-of-ways would occur. In the event that such actions are necessary in the future, they would occur in accordance with applicable legal requirements.



**LETTER NO. 41**

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December 22, 2003

**Comment 41-1**

Sierra Club submits the following comments re: the draft EIR for Phase II for Playa Vista, “The Village.”

**Response 41-1**

The comment provides an introduction to the letter submittal. Comments on the Draft EIR and responses follow.

**Comment 41-2**

Changed Circumstances/New Ownership:

Now that the State of California owns a significant amount of the land that was previously owned by the “Proposed Project Applicant” as stated in the Executive Summary, and more land will transfer to the State of California in January, the City needs to prepare a Supplemental EIR for Phase 2 and a Subsequent EIR for Phase 1 that outlines the impacts of this land ownership change and the impacts of the proposed development to a significantly larger restoration site of the Ballona Wetlands.

**Response 41-2**

None of the land sold to the State of California was part of the Proposed Project or the First Phase Project. Moreover, the Draft EIR discloses the potential sale of Area A and portions of Area B to the State. The Draft EIR in Section I.D., Project Background, on page 7, acknowledges the agreement between the Applicant and the Trust for Public Land (TPL) for the State of California to acquire all of Area A and portions of Area B for long-term open

space/recreation uses as well as the exclusion of Area C from the Playa Vista planning area. Consistent with the TPL Agreement, the State acquired this property in December 2003. At this time, the State has not determined the actual use of or proposed a specific project for these areas. The Draft EIR analyzes impacts of the Proposed Project, if any, on these areas as they currently exist. These areas are geographically separated from the Proposed Project by the First Phase Project Area as well as other urban development. The sale of Area A and a portion of Area B to the State does not alter the previously approved First Phase Project; therefore, the impacts of the First Phase Project as evaluated in the 1993 EIR and 1995 Mitigated Negative Declaration/Addendum remain unchanged. Further, the sale does not alter any component of the Proposed Project; therefore, the impacts discussed in this Draft EIR for the Proposed Project remain unchanged. As discussed in Subsection 3.3.3 of Section IV.D, Biotic Resources, of the Draft EIR on pages 543-545, the Proposed Project is expected to have a less than significant impact on downstream wetland habitats in Area B.

### **Comment 41-3**

#### **Unfair and Inaccurate Characterization of Site:**

Prior to the approval for Phase I of Playa Vista, no major land alteration was undertaken by the developers on the site. The same can not be said for Phase 2. During the Phase 1 development, significant land alteration and vegetation removal was allowed by the City of Los Angeles, sometimes without proper permits issued (and therefore illegally), yet the City Attorney (now the Mayor) turned a blind eye to this activity. This vegetation removal and land alteration has continued to this day, so that now a huge portion of the land proposed as Phase 2 is currently covered with various stockpile operations, parked on by construction and worker vehicles and otherwise scarred so that characterization of the site, particularly from a biological standpoint (geotechnical processes would also be impacted), is not only inaccurate, but unfair. Playa Vista's proposed Phase 2 area should have been reviewed for environmental impacts prior to any such land alteration and vegetation removal. Sierra Club asserts that this draft EIR is thus not only violating the spirit of the California Environmental Quality Act (CEQA), but also its essence.

### **Response 41-3**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase Construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474. As discussed in the referenced Topical Response, since at least 1987, the City has issued dozens of permits to allow over 2,000,000 cubic yards of stockpiling of construction dirt in the Proposed Project site to support construction activities for the First Phase Project. As indicated in historical photographs of Area D contained in Board of Building and Safety File No. 030128, which is included in the reference library, by 1994, a large stockpile, in part composed of dirt from construction excavations at Loyola Marymount University, covered the northern half of the Proposed Project site.

**Comment 41-4**

Need for Additional Alternative to be Studied—“Ballona Centinela Creek Park”:

While Seven Alternatives have been selected for study by this Draft EIR, Sierra Club requests that an eighth alternative be considered seriously, especially in light of the fact that no tenant has been found for the previously approved DreamWorks site to the east of the proposed Phase 2 development and the State of California’s clear interest in acquiring and restoring land in the Ballona Valley floodplain.

This eighth alternative would consider the proposed Phase 2 land to be similar to Alternative 1, which includes no development, but would instead of producing “no change to the existing physical condition and use of the Project site,” Alternative 8 would propose a larger riparian corridor, restored prairie grasslands and a combined passive and active open space park. The same uses would be considered for the previously approved commercial space for the previously planned DreamWorks’ campus, so that both parcels of land—the proposed Phase 2 and the former DreamWorks’ campus would be combined to create the “Ballona Centinela Creek Park.”

If this alternative were considered, net beneficial effects would be significantly better than those included in Alternative 1. This alternative would no doubt become the environmentally superior alternative.

**Response 41-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The selection of Alternatives was based on guidelines presented in Section 15126.6 of the State CEQA Guidelines. As indicated in Section 15126.6(a), “an EIR shall describe a range of reasonable alternatives to the project...an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” The Draft EIR analyzes a reasonable range of alternatives in Section VII, Alternatives.

As further described in CEQA Guidelines Section 15126.6(c), the reasons for rejecting alternatives from detailed consideration include the following: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.” The Draft EIR discusses the selection of alternatives and identifies alternatives considered but rejected, including a Regional Park, Habitat Restoration option alternative, in Subsection 3.2 of Section VII, Alternatives, on page 1263. As indicated, such an alternative would fail to meet nearly all of the Proposed Project’s basic objectives, there is no indication that funding for such an alternative would be available, and implementation of this alternative is considered speculative. Therefore, this alternative was subsequently rejected from further analysis.

**Comment 41-5**

Need for Additional Alternative Sites to be Studied:

Why was only one alternative site selected for study of a possible preferred location for the proposed Phase 2 Playa Vista development? An alternative site needs to be considered that would be more of an infill site—that is, not one that needs infrastructure brought in and one where development and paving of the land has already occurred. This would be preferable for a realistic alternative site that would achieve far less environmental impacts to the region.

It is inaccurate to state, as the Executive Summary does, that an alternative site analysis is “most appropriate” where the decision-maker is also the developer (as in a government or quasi-government project.) A speculative developer could purchase other land or development rights somewhere else for development that would have far fewer environmental impacts than a high-risk liquefaction, highly contaminated former aircraft facility, large quantity methane seep-ridden site in a floodplain such as the one selected for the proposed Phase 2 Playa Vista project.

**Response 41-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR describes the process used to select the Alternative site in Subsection 4.7.2 of Section VII, Alternatives, of the Draft EIR on page 1391. As indicated, a specific methodology was applied to identify alternative sites. Per the discussion, “potential alternative sites were extremely difficult to identify as the region is substantially developed, with few remaining sites that are greater than 100 acres in size and that are available for development. As such sites are rare, they are typically the focus of other development interests, with varying commitments for future use and development. Furthermore, the ability to acquire any such sites is extremely speculative.” Based on the methodology and limitations described above, an alternative site was selected as a relatively more feasible site and analyzed in Subsection 4.7.2, in Section VII, Alternatives, of the Draft EIR on page 1391.

This Project site is an infill site with regional infrastructure in place, and has previously been used for industrial purposes including a former aircraft facility and related runway. The site would provide internal infrastructure as would be required at any site.

The Draft EIR analyzes impacts regarding liquefaction, soil and groundwater contamination, methane seepage and the floodplain in Section IV.A, Earth, Section IV.I, Safety/Risk of Upset, and Section IV.C.(1), Hydrology. As indicated, after mitigation the Proposed Project would have no significant impacts related to liquefaction, soil and groundwater contamination, methane seepage, or flooding.

**Comment 41-6**

## 1. EARTH:

**Fill material—**

At least some of the fill material placed on the proposed Phase 2 Playa Vista development site was brought to the site from Malibu cliff erosion areas between Big Rock and Topanga (one of our members followed trucks that traveled between these sites and observed this activity.) Staff from the Coastal Commission informed one of our Sierra Club staff members that this soil in Malibu included high levels of cadmium and other contaminants and would not be allowed to be used for fill on land in the coastal zone without being cleaned up. What methods of analysis have been used to test fill soil that has been imported from various sites like this and what is the guarantee that unacceptable levels of contamination are not in additional fill being brought to the project site from other locations?

**Response 41-6**

In response to the comment, the City asked the Applicant to research its soil import monitoring files for any record of the soil import described in this comment. The Applicant's response to the City's Request is included in the Reference Library for the Final EIR. The soil monitoring files, dating back to 1987, indicate that there is no record of fill soils from Malibu being imported to the Proposed Project site or the adjacent First Phase Project; the nearest locations from which soils were imported to the site are Brentwood and Santa Monica. Relative to testing procedures for imported fill materials, the Applicant has an established Soil Import Procedure which follows DTSC guidelines for sampling and testing of potential fill material. More specifically, the soil impact procedures require that any site with a history of industrial activities be eliminated as a potential source of fill material.

Fill materials used during cut and fill operations for the Proposed Project may come from two on-site sources—native soils or fill imported to the site by prior landowners. These soils (whether native or imported) are subject to past and continuing investigation and remediation, if applicable, as described in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 666. Historical records of operations at the Hughes Aircraft Company and its successors, past field investigations of contamination at the site, and more recent sampling of soil at the site have been used to identify soils that could pose a threat to human health if left in place at grade. These soils will be remediated to achieve protection of workers, residents and people recreating in the Proposed Project site from unacceptable cancer risk or non-cancer health risks. In the event on-site soils from contaminated areas are proposed to be used for fill material, the actual use of such soils for fill would only occur after the necessary and appropriate remediation of contamination has been completed. Other native soils are expected to meet criteria for protection of human health and may also be used for purposes of achieving final grade.

Additionally, fill materials for the Proposed Project may be imported from off-site areas. The Applicant implemented a soil import procedure for the Playa Vista site to evaluate imported soils. This soil screening procedure was recently re-evaluated and found to be protective for

people that might grow their own vegetables within the Project area (see Camp Dresser & McKee, Inc., Evaluation of Fill Screening Methods for Materials Imported to the Playa Vista Phase 1 Residential Area, Letter from J. LaVelle (CDM) to A. Siddiqui (RWQCB), February 28, 2003, which has been added as an Appendix for the Final EIR). Accordingly, fill materials used at the site to achieve final grade will meet quality criteria for the protection of human health. It is anticipated that the same import procedures used for the adjacent Playa Vista First Phase Project, as applicable, would be applied to the Proposed Project. Please see Section II.13, Corrections and Additions, of the Final EIR for a revision to the Draft EIR regarding the above comments.

### **Comment 41-7**

#### **Faults—**

Please explain the discrepancies between the well-established existence (and accepted in the geologic literature) of the Charnock fault and the current dismissal of the existence of this fault by Playa Vista's consultants. A peer review of these issues seems in order if the City is not to have to go through expensive future reviews after certification of an EIR, like was necessary in Phase 1.

In consideration of the Earth's obvious uplift of the Baldwin Hills, please explain how any and all faults connected with this geologic feature in close proximity to the proposed Phase 2 Playa Vista site would impact structures and people residing or working at Playa Vista Phase 2 should these faults be the subject of earth movement.

### **Response 41-7**

As discussed in Subsection 2.2.2.2.4 of Section IV.A, Earth, of the Draft EIR on page 227, the Charnock Fault's existence is not dismissed, but the geotechnical studies referenced in the analysis (as supported by Appendices D-4 and D-5 of the Draft EIR) conclude that the fault is not present beneath the Proposed Project site. Although the fault is known to exist in the vicinity of the Proposed Project site, there is no evidence to suggest that the fault is present within the geologic formations that underlie the Proposed Project site. As pertains to seismic faults and tectonic processes in the Proposed Project vicinity, as discussed in Subsection 3.3 of Section IV.A, Earth, of the Draft EIR on page 245, all construction at the Proposed Project site would conform to all applicable building and safety codes related to seismic safety. As such, impacts to people or structures resulting from seismic activity, irrespective of the origin of a seismic event, would not be significant.

### **Comment 41-8**

#### **Tar-like materials—**

Please explain whether or not the Tar-like materials and former drilling mud found in the fresh water marsh—area B, as described by Camp Dresser McKee—has been completely removed,

and if so, to where. If the removal has not yet been completed, please explain why and when the removal is planned to be completed.

### **Response 41-8**

The presence of tar-like materials and drilling mud in the Freshwater Marsh area of the adjacent Playa Vista First Phase Project is not addressed in the Draft EIR, since this area is not part of the Proposed Project. As described under Subsection 2.2.1.2.1 of Section IV.A, Earth, of the Draft EIR on page 214, during Camp Dresser & McKee's May 15, 2002 soil and groundwater investigation (Appendix J-3 of the Draft EIR), tar sands were not observed in any of the soil samples collected at the Proposed Project site.

### **Comment 41-9**

Please also explain whether or not drilling mud or tar seeps had anything to do with the fire that transpired on Memorial Day, 1999. If not, please detail, according to City & County Fire Department records what was the cause of this fire and why large planes filled with fire retardants were used to put out the fire, as opposed to regular fire trucks.

### **Response 41-9**

As discussed in Response 41-8, above, the presence and/or status of tar-like materials or drilling mud in former planning Area B is not related to the Proposed Project. Further, the 1999 Memorial Day fire in Area B has no bearing on the Proposed Project or the Draft EIR analysis. The Draft EIR focuses on issues related to the implementation of the Proposed Project, and the cause and nature of the fire, as well as means employed to extinguish it, are not related to Proposed Project activities.

### **Comment 41-10**

#### **Toxic plumes—**

Please explain why there still is evidence of toxic plumes in the groundwater aquifers and aquitards when Maguire Thomas represented to the City of Los Angeles in the early 1990s that remediation would begin and be completed within a specific amount of time. The depictions of the contamination on the maps in Appendix D, Volume III show a much larger contaminated plume than the one previously depicted in Phase 1. Please explain why the plume would be larger than it was in the 1990s.

### **Response 41-10**

A description of the ongoing remediation activities in the adjacent First Phase Project is discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR. As described in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 666 and 667,

all remediation-related work at Playa Vista (for both the adjacent Playa Vista First Phase Project and Proposed Project sites) is being completed in compliance with Cleanup and Abatement Order (CAO) 98-125, issued by the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) in December 1998.

As described in detail for each study area in Subsection 2.2.3.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 683, some investigations and remediation of the Proposed Project site were completed prior to issuance of the CAO (as described in McLaren's 1987 and 1990 reports, Appendices J-12 and J-13, respectively, of the Draft EIR). Pursuant to the CAO, a work plan for a broad investigation of the Proposed Project site was submitted on November 20, 2001, and was formally approved by the RWQCB on February 20, 2002 (this approval is included in Appendix J-3 of the Draft EIR). In order to expedite the work, field activities for the investigation at the Proposed Project site were initiated on January 21, 2002, and completed on March 8, 2002. The report (Appendix J-3 of the Draft EIR) presenting the results of these investigations was submitted to the RWQCB on May 15, 2002. Section 6 of the report included specific recommendations for additional characterization activities. In a meeting on January 24, 2003, the RWQCB approved these recommendations.

The second phase of field activities at the Proposed Project site was conducted from February 18 through May 1, 2003, culminating with the submittal of an addendum report on August 6, 2003 (Appendix J-15 of the Draft EIR). The August 6, 2003, report is currently under review by the RWQCB. The data presented in Appendices J-3 and J-15 of the Draft EIR are discussed in detail in Subsection 2.2.3.2.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 687 through 694. Once the RWQCB completes its review of the August 6, 2003, report, a Remediation Plan will be submitted by the Applicant, which will specify the remedial approaches and technology(ies) to be implemented to reduce contaminant levels to acceptable levels as indicated in the Draft EIR. Completion of remediation cannot be accurately predicted, as it is dependent on a number of factors, including the review periods for remedial planning, design, and operation documents submitted to the RWQCB and, more importantly, subsurface conditions. The fact that completion of remediation cannot be accurately predicted at this time does not mean that there is insufficient information relative to the EIR analyses or that conclusions cannot be drawn regarding the suitability of the Proposed Project site for the development proposed. The nature and extent of contamination within and near the Proposed Project site is well documented and there is sufficient information to conclude that there are proven methods and options for remediating such contamination. Under the CAO, soil and groundwater remediation will be ongoing for a number of years, as deemed appropriate and necessary by the RWQCB under authority of the Porter-Cologne Water Quality Act of 1970.

The Playa Vista First Phase Project EIR provided a depiction of the estimated extent of contamination based on all data available at that time. Since that time, as discussed on pages 683 through 694 in Section IV.I, Safety/Risk of Upset, of the Draft EIR, an extensive amount of additional data has been collected as a logical component of ongoing remedial planning and remediation activities. These additional data are reflected in the recent depictions of the groundwater plume.



**Comment 41-11****2. AIR QUALITY:**

In terms of the “development unit scenario” that was developed for both residential and commercial development to calculate the air quality emissions, is this “development unit scenario” an accurate portrayal of what Playa Vista will be required to comply with in their construction subphase development or is this “scenario” simply a possible scheme that might be complied with?

**Response 41-11**

The “development unit scenarios” were developed for providing a set of conservative planning assumptions related to air quality and are not commitments for a specific construction subphasing as the Project will be developed in response to market conditions. Development unit scenarios were developed by professionals in the field of building construction and are the most qualified in developing construction schedules. A development unit scenario was used to best represent logical construction profiles using the forecasted construction schedule and calculating the forecasted emissions to evaluate potential impacts of the Proposed Project. Based on these analyses, the Draft EIR proposes feasible mitigation measures. However, even with implementation of these mitigation measures, the Proposed Project would still have a significant and unavoidable impact on regional air quality (see Subsection 5.0 of Section IV.B, Air Quality, of the Draft EIR, on page 340).

**Comment 41-12**

Please explain how air emission monitoring of Phase 1 compares with estimates made originally in Phase 1 Final Environmental Impact Report, supplements and addendums, and whether or not monitoring of these results were factored in to the Phase 2 calculations for air quality.

**Response 41-12**

The Air Quality Monitoring Program for the First Phase Project was approved for the City in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995, and is not part of the Proposed Project. Calculations of emissions for the Proposed Project were consistent with the methodologies identified in the SCAQMD’s *CEQA Air Quality Handbook* or advocated for use by the SCAQMD. The commentor is referred to the SCAQMD comment letter on the Draft EIR (Comment Letter No. 18) for additional support of the adequacy of the Project-related calculation of emission.

**Comment 41-13****3. WATER RESOURCES—HYDROLOGY:**

Since the fresh water marsh is apparently only sufficient to cleanse dry weather flows, how can the increase (due to increased impervious surfaces) of stormwater runoff flowing into adjacent water bodies be deemed to be insignificant?

**Response 41-13**

The construction of the Freshwater Wetlands System, including the Freshwater Marsh and the Riparian Corridor was analyzed in the previously certified First Phase EIR. As noted in Subsection 2.2.1.3.2 of Section IV.C.(1), Hydrology, of the Draft EIR on page 358, the Freshwater Marsh is one of two major components of the overall Freshwater Wetlands System that was designed and subsequently permitted by the relevant governing agencies as a comprehensive system to enable the adjacent First Phase Project and the Proposed Project, at buildout, to: (1) control the amount of freshwater flowing to the Ballona Wetlands and Ballona Channel; (2) substantially reduce the amount of surface water pollutant loads to the Ballona Wetlands; and (3) achieve a no net increase in pollutant loads to the Ballona Channel, Ballona Wetlands and Santa Monica Bay. The Freshwater Marsh has been designed to receive stormwater and dry weather runoff from the Jefferson Boulevard Storm Drain, the Central Storm Drain, the Riparian Corridor, and the Lincoln Drain South. These drains outlet into the Freshwater Marsh at primary management (pre-treatment) areas. The Freshwater Marsh has been designed to contain stormwater flows up to the 1-year design storm which constitutes 92 percent of the estimated annual storm flows (see Subsection 3.4.1.1.2 of Section IV.C.(1), Hydrology of the Draft EIR on page 381. The pollutant loading model discussed in Subsection 3.4.1.2.7.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 490, predicts average annual stormwater loads, concentrations, and flow volumes to each of the Freshwater Marsh primary management areas and the main body of the Freshwater Marsh. As such, the model results are not limited to dry weather flows as suggested by the commentor. The specifics of the modeling results in this subsection are summarized in Subsection 3.4.1.2.7.1 of Section IV.C.(2), Water Quality, of the Draft EIR, starting on page 490. The predicted concentrations in the main body of the Freshwater Marsh, as well as the primary management areas (including those receiving the majority of runoff from off-site areas), do not exceed CTR criteria, and do not cause regulatory standards to be violated as defined or referenced in the applicable NPDES Permit (MS4 Permit) or Basin Plan (see Subsection 3.4.1.2.7.1 of Section IV.C.(2), Water Quality, of the Draft EIR).

**Comment 41-14**

Why is only the projection of a 50-year storm event considered in the adverse impacts analysis, and not a 100-year storm event, which is usually the standard for consideration by the United States Army Corps of Engineers in determining potential flood damage impacts?

**Response 41-14**

As addressed in Subsection 2.2.1.3.2 of Section IV.C.(1), Hydrology, of the Draft EIR on page 354, both the Army Corps of Engineers' 100-year flood (56,000 cfs) and Standard Project flood (68,000 cfs) are less than the County of Los Angeles' 50-year design flood of 69,800 cfs. Therefore, the County's 50-year design flood was used to be conservative.

**Comment 41-15****4. WATER RESOURCES—WATER QUALITY:**

In light of scarce water sources for all of Southern California and in consideration of State Senator Sheila Kuehl's bill (now law) to designate specific water sources for developments of a size consistent with this project, why is there no mention of the specificity of the water source(s) for this project?

**Response 41-15**

The bill referenced by the commentor is most likely SB 221, which requires that the approval of a development agreement or subdivision be conditioned on a written verification that sufficient water supplies exist for the Project. The Water Supply Assessment (WSA) performed for the Draft EIR was completed in accordance with the requirements of California Water Code Section 10910 et. seq., as amended by another bill enacted on the same day as SB 221, SB 610 (Costa). SB 610 requires that a water supply assessment be completed during the EIR process. The requirements associated with implementation of SB 221 allow for the use of a water supply assessment prepared pursuant to the requirements of SB 610 (see Government Section 66473.7(c)(2)). The WSA prepared by LADWP includes the descriptions of water sources required by SB 610 and the Water Code, which, in effect, also respond to the purpose and intent of Senator Kuehl's bill (SB 221 as integrated into the state Government Code).

**Comment 41-16**

Also, in light of the above-mentioned factors, why is only 50% of the community landscaped areas determined to use native or drought-resistant vegetation? Why not 100%? Also—if it was a requirement to us [sic] only noninvasive vegetation for landscaping in Phase 1, as Phase 2 requirements state in this draft EIR, what is the penalty for doing otherwise and how are citizens expected to receive assistance from City employees to enforce these rules? This is important because Playa Vista has been out of compliance with these requirements on a regular basis in Phase 1.

For example, directly across the street from now State-owned land that is protected wetlands habitat slated for restoration is a huge swath of Fountain Grass surrounding the Water's Edge development. This Fountain Grass, a native of Africa, is highly invasive and could cost the State

of California significant financial resources to remove plants if a breeze blows the seeds from these plants across the street, which is highly probable.

### **Response 41-16**

The mitigation measure requiring that no less than 50 percent of the community landscaped areas use native or drought-resistant vegetation is designed to minimize irrigation runoff. As stated in Subsection 5.0, Section IV.C.(2), Water Quality, of the Draft EIR on page 520, with implementation of this measure along with the balance of the mitigation measures proposed in the Draft EIR, impacts to surface water quality would be less than significant. Therefore, there is no need to require 100% of the community landscaped areas to use native or drought-resistant vegetation, as suggested by the commentor.

Implementation of adopted mitigation measures are enforced by the City of Los Angeles through a Mitigation Monitoring and Reporting Program (MMRP), which will be adopted with the certified Final EIR. The Draft EIR includes a Draft MMRP in Volume II, Technical Appendix C.

The impacts and mitigation measures associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995.

### **Comment 41-17**

#### **5. BIOTIC RESOURCES:**

Why has the City allowed stockpiling of huge amounts of earth, rock and other materials being moved from the Catellus development to be placed on top of this site while there is still an environmental review being completed?

### **Response 41-17**

The soils recently imported to Area D from the Catellus West Bluffs development have been stockpiled in portions of Area D that are part of the First Phase Project site and not part of the Proposed Project site. As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

**Comment 41-18**

In addition, why has the City allowed Playa Vista to significantly alter the land and remove vegetation before an EIR is certified and before any construction or grading permits have been granted for Phase 2?

**Response 41-18**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase Construction activities. All activities have been conducted in compliance with local, state and federal permits.

The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

**Comment 41-19**

How can the conclusion be made that there would be no impact to wildlife movement corridors without taking into consideration bird flight paths?

**Response 41-19**

Because there is no evidence that bird flight paths have become established at any consistent location or direction over the site of the Proposed Project, it is not anticipated that the Proposed Project would adversely affect their movement. As stated in Subsection 2.2.1.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 535, certain bird species have been observed flying or foraging over the site. However, these observations do not mean that the site is a wildlife movement corridor, which is defined as a linkage between areas of core habitat and which is applied typically to mammalian wildlife rather than birds (see Appendix G-2 of the Draft EIR, page 35).

As stated in Section II.B, Project Characteristics, of the Draft EIR on page 154, the Riparian Corridor component of the Proposed Project is the last segment of a 25-acre riparian corridor that will feed into the Freshwater Marsh. Construction of the west segment of the Riparian Corridor is expected to be completed by late 2005 (Subsection 2.3 on page 539). As indicated in Subsection 3.3.3 on page 544, monitoring data contained in the Ballona Freshwater Marsh Annual Report, December 2003 (included in the Reference Library for the Final EIR), have demonstrated rapid colonization of the habitat by wildlife, with the number of breeding bird species significantly greater than expected for a newly constructed habitat. This information indicates the habitat is either already established (Freshwater Marsh) or scheduled for establishment (First Phase of the Riparian Corridor) prior to impacts of the Proposed Project. As also stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor component of the Freshwater Wetlands System is expected to have a

beneficial effect of establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists.

### **Comment 41-20**

How can a conclusion that loss of foraging area for the Cooper's Hawk and other raptors will be "unlikely to affect long-term survival of species" when near-by nesting sites might have been selected by these hawks due to the amount of foraging habitat available in the project site area?

### **Response 41-20**

It is assumed that the commentor paraphrases parts of sentences in Section IV.D, Biotic Resources, of the Draft EIR on pages 547 and 552. The commentor also claims presence of raptor nest sites near the Proposed Project and speculates that Cooper's hawk and other raptors chose these nest sites due to their location near the site of the Proposed Project. The commentor's claim that Cooper's hawk and other raptors are nesting near the site of the Proposed Project will be incorporated into the Final EIR for review and consideration by decision-makers.

Subsection 3.5 on pages 547 and 552 states that "the Urban Development Component of the Proposed Project would result in a net loss of foraging area for raptors such as Cooper's hawk, but is unlikely to affect long-term survival of the species *due to the restoration components of the Project and presence of more diverse foraging opportunities off-site in the nearby Ballona Wetlands*" (emphasis added). In considering potential impacts of loss of raptor foraging area, the probable size of the prey base and its capacity to support predators must be evaluated in addition to total acreage of land. The conclusion in the Draft EIR, quoted above, is based on an assumption that the increase in diversity of cover and native vegetation resulting from the Habitat Creation/Restoration components of the Proposed Project will increase the abundance of rodents, snakes, lizards, and small birds that form the food base for raptors, including Cooper's hawk.

### **Comment 41-21**

Riparian habitat will not provide suitable foraging habitat for hawks, so please explain how the "restoration components of the project" assist in providing "long-term beneficial impacts" to... "raptors."

### **Response 41-21**

It is assumed that the commentor paraphrases a statement made in Section IV.D, Biotic Resources, of the Draft EIR on page 547. Contrary to what the commentor implies, this statement does not assert that the riparian habitat creation component of the Proposed Project will provide suitable foraging habitat for hawks. The Draft EIR's conclusion regarding potential for long-term beneficial impacts on raptors is based on the expectation that the Habitat

Creation/Restoration Component of the Proposed Project will provide both breeding habitat (riparian) and foraging habitat (restored coastal sage scrub, grassland) for raptors, which will add to the existing foraging and breeding habitat provided by the Ballona Wetlands.

**Comment 41-22**

I have personally observed nesting Cooper's Hawk in the Phase 2 lands this last spring. Please inform Playa Vista that this information is to only be used to analyze the impacts of the development on this nesting species, and not to be used to remove trees that the Hawk has been using. If Playa Vista removes these trees, even during non-nesting season, as they did for the nesting Red-tailed Hawks, there will be legal ramifications for the City and for Playa Vista. Please analyze the impacts of Phase 2 development on this nesting species.

**Response 41-22**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Please also see Responses 41-20 and 41-21, above.

**Comment 41-23****11. SAFETY/RISK OF UPSET:**

While a CDM report for Phase 2 states that "perchlorate [*sic*] and NDMA were... not detected in any soil sample above laboratory reporting limits" in the former rocket alignment building of the Hughes Aircraft facility, please specify for the record the exact amounts that were found and what health risks might be associated with those amounts if vegetable gardens were grown in this area. Please also describe any other human health risks that might result from these contaminants being present in the soil or groundwater.

**Response 41-23**

Six soil samples were collected on May 1, 2003, in the vicinity of the former Rocket Alignment building and analyzed for perchlorate and semi-volatile organic compounds, including n-nitrosodimethylamine (NDMA). Residual levels of perchlorate and NDMA were not detected in any of these six soil samples (see Appendix J-15 of the Draft EIR). Lack of any detections at these low detection limits suggests that no source of either perchlorate or NDMA is present at the former Rocket Alignment building. Without a source, or any detectable amounts of these chemicals, human health risks can reasonably be assumed to be negligible.

**Comment 41-24**

Please explain how the conclusion was reached by Camp Dresser McKee in Appendix J that there is “no significant or continued source of groundwater contamination... in Area D2,” and whether this conclusion also applies to the soil contamination.

**Response 41-24**

There are no longer industrial activities ongoing within the Proposed Project site. Therefore, there is no evidence that additional contamination to the soil is occurring. Furthermore, in each of the areas of concern where historical industrial activities have taken place, extensive characterization has been performed to identify potential sources and areas of impacted soil that could affect groundwater quality. Through the characterization activities, areas where soils containing contaminants above applicable cleanup criteria were identified. Remedial activities were performed to mitigate impacted soils and remove potential sources of contamination. Additional remediation will occur as necessary following RWQCB approval of the Soil and Groundwater Investigation Report – Phase II Addendum, Phase 2 Portion of Area D Project Area, Playa Vista Site (CDM, August 6, 2003). Results presented in this Addendum show that there are no chemicals in the unsaturated soils that are causing a significant or continuing contamination of groundwater (see Appendix J-15 of the Draft EIR). Therefore, no continued or significant source of groundwater contamination was identified and only residual soil and groundwater contamination remains within the Proposed Project site.

**Comment 41-25**

Please explain how the huge amount of stockpiling being done in the proposed Playa Vista Phase 2 area impacts the soil and groundwater testing for contaminants, as well as methane testing.

**Response 41-25**

It is unclear the “huge amount of stockpiling” to which the commentor refers. It is assumed the commentor refers to the stockpiling of approximately 100,000 cubic yards of soil south of Runway Road on the Proposed Project site under a permit from the City Department of Building and Safety that allows the stockpiling of 500,000 cubic yards of soil in this location. Stockpiling of this soil was initiated in 2001; however, most of the stockpiling in this location occurred in 2002 and 2003. The presence of the above referenced soil stockpile, or any other future soil stockpile, is not anticipated to have any significant impact on soil, groundwater, and soil gas testing within the Proposed Project site or adjacent First Phase Project area.

Any future soil sampling that may be required to investigate potential residual contamination beneath a soil stockpile would be collected in relation to surveyed surface elevations, thereby allowing for the collection of soil samples from the native soil under the stockpile. Drilling equipment used to collect the soil samples would be sized appropriately to allow the collection of



soil samples at depth. Furthermore, because there are no groundwater monitoring wells under the stockpile, the stockpiling will not impact the ability to monitor groundwater.

As described in Subsection 2.2.4 of Section IV, Safety/Risk of Upset, of the Draft EIR, and reported in Appendices J-4 to J-10 and J-15, the methane studies completed within the Proposed Project Site provide a baseline of methane and other soil gas data. These investigations were performed between December 1998 and January 2001 and were completed prior to the soil stockpile placement south of Runway Road in the Proposed Project site. Also, as described in Subsections 2.1.3.3 and 4.0 on pages 669-670 and 738-739, respectively, and Appendix J-14, prior to issuance of building permits, prospective builders will complete additional soil gas assessments that include methane testing. Data from these investigations will be used to define appropriate mitigation measures for a particular building. It is anticipated that the majority of the stockpile will be removed prior to initiating construction activities within the Proposed Project site. Portions of the stockpile, or any future stockpile, that may remain as fill for development of the Proposed Project are not anticipated to adversely affect the quality or applicability of the soil gas investigation results since measured soil gas concentrations would represent the current site conditions prior to development activities.

#### **Comment 41-26**

#### **12. POPULATION, HOUSING AND EMPLOYMENT:**

Sierra Club objects to the use of SCAG assumptions for human population growth and asks the City of Los Angeles to consider whether or not the natural resources of this region are not already overtaxed and whether or not we have limits to the amount of human population growth this region can accommodate.

#### **Response 41-26**

SCAG regional projections provide advisory information to various jurisdictions and public agencies (e.g. technical staff and decision-makers) to be used for land use planning and the provision of various community services. Under CEQA Guidelines, Section 15126.2, “[i]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” Physical changes to the environment that occur as a result of growth may be significant or less than significant. All of the Proposed Projects impacts have been analyzed with regard to their impacts on the physical environment, both individually and cumulatively.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

#### **Comment 41-27**

#### **13. TRAFFIC AND CIRCULATION:**

Given the 24,220 daily trip ends contemplated in the draft EIR, what is the anticipated number of those daily trip ends that are anticipated to have some part of the trip travel adjacent to one or more of the now fully protected Ballona Wetlands edges? It is important to know this in order to properly calculate the potential impacts to wildlife in these areas.

**Response 41-27**

Roadways adjacent to the Ballona Wetlands and the properties recently acquired by the State of California include the following roadway segments—Lincoln Boulevard between Bluff Creek Drive and Fiji Way, Jefferson Boulevard between Culver Boulevard and Lincoln Boulevard, and Culver Boulevard between Pershing Drive/Nicholson Street and the SR 90 freeway. The traffic volumes during the peak hours along these roadway segments can be obtained from Appendix K-2 of the Draft EIR, Figures 4-5 through 4-8 for A.M. and P.M. peak hours, respectively.

Based on the traffic volumes projected in the traffic study for the Draft EIR for these roadways in the area adjacent to the Ballona Wetlands, the Proposed Project is anticipated to result in increased average daily trips (ADT) of 1.5 percent along these roadways.

**Comment 41-28****16. FIRE PROTECTION:**

The draft EIR suggests that the Fire Station required under the Phase 1 development will be funded by Phase 2 tax revenues. Please explain if the City is indeed counting on Phase 2 to be built in order to fund Phase 1 mitigation requirements.

**Response 41-28**

The Draft EIR describes Playa Vista Fire Station in Subsection 2.2 and Subsection 3.4.1 of Section IV.L.(1), Fire Protection. As indicated, in Subsection 3.4.1, on page 974, the station is a Condition of Approval for the First Phase Project and is required to be completed independently of the Proposed Project. Construction is expected to begin in the fall of 2004. The Draft EIR does not state that construction of the Fire Station would be funded from revenue generated by the Proposed Project; rather, it states that staffing of fire stations generally and the Fire Station required as a First Phase Condition of Approval could be funded from Project revenues. Page 975 of the Draft EIR states: “The Proposed Project would generate revenues to the City that could be applied toward the provision of staffing for existing and anticipated facilities. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socioeconomic issue that may be addressed further by the decision-makers. If such funds are not applied to sufficient staffing of the anticipated new fire station, a potentially significant impact could occur.” An estimate of Project revenues to the City is provided in Appendix P of the Draft EIR.

**Comment 41-29**

## 18. SCHOOLS:

Please explain if the methods used for calculating the number of potential students by Playa Vista have been used elsewhere in Los Angeles County or Southern California, and explain why these calculations were preferable to the calculation method employed by the Los Angeles Unified School District (LAUSD.)

**Response 41-29**

The methodology used to calculate the number of public school children generated by the Proposed Project was developed based on the specific location and housing characteristics of the Proposed Project. The Draft EIR sets forth the basis for utilizing the Proposed Project's student generation methodology in Subsection 3.1 of Section IV.L.(3), Schools, on page 1007 and is supported by Appendix L of the Draft EIR.

The methodology used in the forecasting of public school children generated by the Proposed Project was developed in consultation with the LAUSD [see Comment No. 17-5 and Inter-Office Correspondence from Rena Perez (LAUSD) to Joan Friedman (LAUSD), September 16, 1999 (refer to the new appendices to the Final EIR)]. The LAUSD, in their comment letter on the Draft EIR, requested additional clarification regarding the Draft EIR's methodology for calculating the Project's student generation. This clarification did not alter the methodology used in the Draft EIR's forecast of the Proposed Project's student generation.

**Comment 41-30**

## 19. PARKS AND RECREATION:

How does the 11.4 acres of people park space for the anticipated 5,720 residents change the ratio of park space per capita in the City of Los Angeles, and likewise in the County of Los Angeles. Both the County and the City have been out of compliance with their own stated standards for park space per capita. Does this development improve that ratio or make it less adequate?

**Response 41-30**

The Draft EIR provides an analysis of Proposed Project's impacts on park ratios in Section IV.L.(4), Parks and Recreation. Table 152 on page 1036 provides a summary of the analysis. As indicated the Proposed Project's 11.4 acres would provide park space that would be open to the public at a ratio of 2.0 acres per 1,000 population. This contrasts with 0.7 acre of parks per 1,000 population in the Westchester-Playa del Rey Plan area, 0.7 acre per 1,000 population in the City of Los Angeles, and 0.5 acre per 1,000 population for the portion of Los Angeles that lies within a 2-mile radius of the Proposed Project. Therefore, as indicated in the analysis, the park service ratios in these areas would be improved. The Proposed Project's

mitigation measure that requires an increase in the amount of park space to 17.6 acres would further improve the ratios. As the service ratio in the County is approximately 0.8 acre per 1,000 population, the County ratio would also be improved.

### **Comment 41-31**

Despite the clever analysis and explanation of alleged compliance with the State's Quimby Act, and the conclusion that ongoing maintenance and improvement needs would need to be taken on by the City if the Act were to be met in its entirety, please explain why the developer is not being required to indeed satisfy the requirement of providing 17.65 acres of parkland dedication in order to comply fully with the Quimby Act.

### **Response 41-31**

This comment misstates the information presented in the Draft EIR. Subsection 4.0 of Section IV.L.(4), Parks and Recreation, states the following on page 1039:

“The proposed Project shall provide park space in an amount equivalent to not less than a total of 17.16 acres (3 acres per thousand residents). A minimum of 11.4 acres shall be provided (2 acres per thousand residents) within the Proposed Project; the remaining park space may be satisfied through provisions of additional park space within the adjacent Playa Vista First Phase Project or on land controlled or improved by the applicant and its affiliates (i.e., nearby off-site locations).”

### **Comment 41-32**

Given that there is an obvious need for bicycle jump open space areas for teenage boys that Playa Vista has allowed in sensitive salicornia areas of Area A for at least several years, combined with the fact that the State of California intends to now restore Area A as wetlands ecosystem habitat, explain why an area in Phase 2 would not be considered by the City as necessary to accommodate the bicycle jump recreation area.

### **Response 41-32**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

While specific programming of the activities and amenities for the parks within the Proposed Project has not occurred at the present time, Subsection 3.3.1 of Section IV.L.(4), Parks and Recreation, of the Draft EIR on page 1033 states:

“In addition to providing this parkland, the Proposed Project would include the improvement of these parks with landscaping, hardscaping, walking, jogging and bicycle trails, children's play areas, recreational fields and other recreational facilities, (i.e.

basketball courts, skating rings, etc.) with an emphasis on active activities, as appropriate.”

**Comment 41-33**

Also, given that Playa Vista has for many years sponsored the Playa Vista Little League and now the State of California will transfer to the California Department of Fish & Game as of January 1, 2004, the land where the Little League has played, please explain why the City of Los Angeles would not require Playa Vista to include active sports fields in the proposed Playa Vista Phase 2 area.

**Response 41-33**

This comment is noted and will be incorporated into the Final EIR for review and consideration by decision-makers. Please also refer to Response 41-32.

**Comment 41-34**

While some mention of “active activities” is mentioned, no specificity is included, and this specificity would be helpful in assisting the State of California and interested restoration stakeholders in insuring that young people who have utilized areas of the Ballona Wetlands will still be able to participate in their active sports, while the wetlands restoration efforts are also not unnecessarily compromised.

**Response 41-34**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Please refer to Response 41-32.

**Comment 41-35****27. ARCHAEOLOGICAL RESOURCES:**

Sierra Club has learned that there may have been recent grave excavations at the Playa Vista site that are significant. Please explain these findings in detail in the final EIR so it can be determined if all proper procedures for such archaeological excavations have been followed and if further mitigation is necessary.

**Response 41-35**

Potential impacts to archaeological resources, including impacts on Native American burials, associated with the Proposed Project are addressed in Section IV.P.(2), Archaeological Resources, of the Draft EIR, beginning on page 1199. The Draft EIR identifies and discusses the

potential impacts on CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769 and concludes, on page 1224, that implementation of the Programmatic Agreement (Appendix O-1 of the Draft EIR) and mitigation measures listed in the Draft EIR would reduce impacts on archaeological resources to a less-than-significant level. The details regarding the cultural resources encountered within the Proposed Project site and treatment plans to address those resources are presented in Appendix O-3 of the Draft EIR, as well as the 1991 Research Design and Data Recovery Plan for CA-Lan-62 and CA-Lan-211, which have been included in the Appendices of the Final EIR.

As reported in the 1991 Playa Vista Archaeological and Historical Project Research Design, archaeological excavations of the western portion of Area D in the 1940s and 1950s, uncovered numerous Native American burials. The current archaeological activities in the western portion of Area D, which have uncovered Native American burials, are part of the Playa Vista First Phase Project. These activities were approved by the City as part of the First Phase Project in a separate EIR (EIR No. 90-0200-SUB(C) (CUZ) (CUB), State Clearinghouse No. 90010510, certified by the City in September 1993. These activities are in compliance with the Programmatic Agreement and the requirements of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

The 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. As identified in the mitigation measures included in Subsection 4.0 of Section IV.P(2), Archaeological Resources, of the Draft EIR on pages 1222-1223, efforts will be made to avoid human remains and other archaeological resources. In cases where human remains are encountered, the Applicant shall comply with the Programmatic Agreement and the requirements of the California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. The Most Likely Descendant designated by the Native American Heritage Commission for Playa Vista has provided guidelines for the handling of human remains. The guidelines would be considered in connection with the handling of Native American remains discovered during construction of the Proposed Project.

#### **Comment 41-36**

Please specify who has been monitoring these archaeological excavations from the Gabrielino Indians.

#### **Response 41-36**

As explained in Response 41-35, the current archaeological activities in the western portion of Area D are part of the First Phase Project.

During the current construction of the riparian corridor for the First Phase Project, representatives from several Gabrielino groups have monitored the archaeological excavations. As indicated in Subsection 4.0 of Section IV.P(2), Archaeological Resources, of the Draft EIR

on page 1223, the Proposed Project will continue this practice, but the Native American representatives acting as monitors may change.

**Comment 41-37**

Please include the Sierra Club at: PO Box 5332, Playa del Rey, CA 90296, regarding all notifications and information about the archaeological excavations at the Playa Vista site.

**Response 41-37**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 41-38**

ADDITIONAL COMMENTS:

The draft EIR states that numerous nonnative trees will be planted in Phase 2, much like those planted in Phase 1. Sierra Club urges the City to not allow more nonnative trees to be planted in Phase 2, which will only encourage more crow populations, which in turn decimate endangered bird nests, like those of the California Least Tern.

A very beautiful landscape design can be completed with native bushes and shrubs that do not harbor crows. For example, native trees such as the Coast Live Oak and Laurel Sumac would be appropriate and attractive, as would numerous other bushes and shrubs. Please suggest something along this line and explain why this can not work, if the developer insists it can not.

**Response 41-38**

As set forth in the O&M Manual for the Freshwater Wetland System and the HMMP, monitoring and maintenance requirements have been established for the Freshwater Marsh and Riparian Corridor to prevent non-native plant species from becoming established within the system. Further, a mitigation measure has been added to restrict invasive plant species from being planted along Bluff Creek Drive within the Proposed Project.

Please see Section II.7, Corrections and Additions, of the Final EIR for a revision to the Draft EIR regarding the above comments.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 41-39**

Finally, the City needs to demonstrate vision as the City of New York did when it created Central Park. The Ballona Centinela Creek Park could provide a respite of a natural park space adjacent to very intensive urban land uses, including a massive development that rises immediately adjacent to the 405 freeway, the Hughes Center. Softening the impact of the already unbearable Playa Vista development, in its not even half-completed Phase 1 situation, by opting for a natural, passive and active park space would be much preferable to building more of the same in Phase 2.

**Response 41-39**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 41-40**

Please allow for an extension of time for comment on this draft EIR to the specific entities that will be involved with management and restoration for the newly acquired public Ballona Wetlands areas. Given that most of the land was just conveyed to the public last Friday (with additional land transferring in January), these agencies have not been notified nor have they had adequate time to comment. The following entities should be notified and encouraged to comment, as new stakeholders in the process: California Department of Fish & Game (management, not regulatory division), United States Army Corps of Engineers Coastal Studies Group, Trust for Public Land, Ballona Watershed Council & Conservancy, Ballona Watershed Task Force and California State Coastal Conservancy.

**Response 41-40**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. All entities required to be notified pursuant to CEQA, including local, state, and federal agencies, as well as interested parties requesting notification, were notified of the availability of the Draft EIR.

**Comment 41-41**

[Handwritten Attachment]

12/22/03

To: Sue Chang  
Addendum to comments

EIR—



Please also include in the final EIR Edith Read's historical survey results of plants in Area D.

Thank you.

Robert Roy van de Hoek  
Chair, Sierra Club Ballona Wetlands Task Force  
818-222-7456

**Response 41-41**

The commentor does not specify to which document he refers. However, a review of historical survey results, in the context of evaluating potential for sensitive plant species to occur on the Proposed Project site, is provided in Appendix G-2 of the Draft EIR.

**LETTER NO. 42**

Spirit of the Sage Council  
30 North Raymond Avenue  
Pasadena, California 91103

December 22, 2003

**Comment 42-1**

This letter represents initial comments of Spirit of the Sage Council regarding the Playa Vista Phase 2 EIR. We also support the comments of Grassroots Coalition and the Ballona Wetlands Land Trust regarding this site, and urge you to answer their excellent questions fully.

**Response 42-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The letters from Ballona Wetlands Land Trust and Grassroots Coalition have been included and responded to the Final EIR. Please refer to Comment Letters 30 and 35.

**Comment 42-2****BIOTIC RESOURCES:**

It appears that CEQA has been violated on the Ballona wetlands Phase 2 site. According to CEQA the state of the land is that at the time of the NOP which was December 2002. However, after that date, the City of Los Angeles allowed the developer Playa Capital to bulldoze and otherwise destroy the biological habitat of the site.

Question: Why did the City of Los Angeles allow Playa Capital to do this, before the public even had a chance to comment on its wildlife habitat value? Isn't this a "slap in the face" to the public's interest in saving this habitat, as well as a violation of CEQA?

Comment: The Sage Council, Grassroots Coalition and the Ballona Wetlands Land Trust spent many volunteer hours doing research to show the City of LA that Playa Capital (Gary Winnick, Morgan Stanley, Goldman Sachs and ULLICO) was bulldozing Phase 2 without permits. Finally, the City admitted we were right, but then they went and issued "retroactive permits" to Playa Capital - continuing to allow them to destroy wildlife habitat right in the middle of this EIR process.

The result is that this DEIR process has been made into a sham. We are very disappointed in this lack of consideration for the value of our last 5% of wetland habitat in LA County.

LA County has already destroyed 95% of its wetland/upland systems. California has destroyed 95% of its coastal wetland/upland areas. Therefore, every square inch of open space at the Ballona wetlands is like gold for migratory birds, ocean animals, and the now very rare wildlife of Los Angeles. The Phase 2 area is more important to sustain these ecosystems, than it is for more commercial space/housing. The Ballona wetlands ARE NOT urban infill, they are much-needed restorable habitat.

In the Phase 1 EIR, Frank Hovore stated that all of Area D had value as an important functioning ecosystem and wildlife habitat.

### **Response 42-2**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity In The Project Area, on page 474, above. This issue was thoroughly considered by the City Board of Building and Safety Commissioners in July 2003 and rejected.

As discussed in Subsection 3.3.3 of Section IV.D., Biotic Resources, of the Draft EIR on page 543, the Ballona Wetlands Significant Ecological Area (SEA) is located outside the Project site west of Lincoln Boulevard.

The commentor is mischaracterizing statements made by Frank Hovore in the Draft EIR for the First Phase Project. In Appendix J-9, Ballona Wetlands/Playa Vista Biota – Amphibians, Reptiles and Mammals, to the Draft EIR for the First Phase Project, on page I-10, Frank Hovore characterizes Area D as follows: “Most of Area D is severely degraded, and a significant portion of the area is under older fill and graded materials, existing factories, storage facilities, access roads and parking lots, evaporation ponds, and other remnants of former factory operations. Centinela Creek is confined to a narrow, steep-sided runoff channel, carrying flows from street drainage, adjacent plant operations, and wastewater dumping. . . . Opportunistic riparian elements, primarily willows (*Salix* spp.) and cattails (*Typha* sp.) have colonized channel margins and bottom, but overall the area is dominated by ruderal herbaceous vegetation.”

The remaining comments are noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

### **Comment 42-3**

#### **SAFETY/RISK OF UPSET**

We are still very concerned at the continued cover-up of the gas dangers at Playa Vista. Our concerns include the following:

1) Comments made by the State Department of Toxic Substances Control on the CLA Report have still not been addressed 2 years later. When do you plan to address these concerns? Now appears to be a good time to address them, in this DEIR.

### **Response 42-3**

Gas and soil gas issues were extensively addressed in Section IV.I., Safety/Risk of Upset, of the Draft EIR. The City's Chief Legislative Analyst (CLA), as well as the Regional Water Quality Control Board (RWQCB) and the Applicant, responded to all DTSC comments on the referenced CLA report. The responses of the CLA, RWQCB, and the Applicant to the DTSC's comments to the May 2001 CLA Report have been added to the Appendix as part of the Final EIR for the Proposed Project. Soil gas is also addressed in Topical Response TR-12, Soil Gas, on page 477.

See also Response 12-2.

### **Comment 42-4**

2) Now that the City of LA knows that SOCALGAS has the right to store gas under Phase 1 of Playa Vista (Fountain Park Apts. Background documents), please check if they are allowed to store it under Phase 2 and other parts of Phase 1.

### **Response 42-4**

As discussed in Subsection 2.2.1.1.1 of Section IV.I., Safety/Risk of Upset, of the Draft EIR on page 670, the Playa del Rey oil field, located along the Ballona Escarpment northward to Venice, originally consisted of three reservoirs: the Del Rey Hills area, the Venice area, and the Kidson area. The Southern California Gas Company owns the Del Rey Hills area, the only reservoir used for natural gas storage, which is situated approximately 1.25 miles west of the Proposed Project site, on the north and south sides of the Ballona Channel at a depth of more than 1 mile (approximately 6,200 feet) below the surface. The Southern California Gas Company Del Rey Storage Facility is not under the Proposed Project site or the residential and commercial portions of First Phase Project.

### **Comment 42-5**

Also, please check what impact this has on gas migration on the site. Thus far, the City has refused to hire a petroleum engineer expert for this site to fully assess the gas migration patterns. We think one should be hired, as a minimum step to protect the public's health and safety.

### **Response 42-5**

The issue of gas migration between the Del Rey Storage Facility and the Playa Vista project site has been investigated extensively. It was concluded that the methane at Playa Vista is not

migrating from the Del Rey Storage Facility. In his April 17, 2000 report, the City's peer reviewer, Dr. Victor Jones III of Exploration Technologies, Inc., stated that "[t]he soil gas and monitor well data from site 509 indicates there is no gas migration at this location from the adjacent Playa del Rey storage field." See Dr. Victor Jones' April 17, 2000 report. Furthermore, in 1993 and 1994, Dr. Isaac Kaplan analyzed gas samples from the Del Rey Storage Facility and gas samples from the Ballona Channel and Centinela Creek. In the study, Dr. Kaplan concluded that the gas located in the Ballona Channel and Centinela Creek was not emanating from the storage facility. See January 20, 1994 report by Dr. Isaac Kaplan, entitled "Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina Del Rey, California." (This item is located in the reference library for the Final EIR.)

To further evidence that the gas detected at Playa Vista is not migrating from the reservoir, the Applicant, The Gas Company, the City's Department of Building and Safety, and Dr. Victor Jones compared analyses on various components of gas from injection wells and observation wells at the Del Rey Storage Facility and the aquifer and soil gas samples from Playa Vista and concluded "with a high degree of confidence, that there is no evidence for migration of the Southern California Gas Company stored gases into the Ballona Aquifer or into the surface soil at Playa Vista Development site." See "Report on Comparison of Gas Analyses from Southern California Gas Company Injection Wells with Soil Gas and Groundwater Gas from 50 ft. Gravel Aquifer" dated January 29, 2001, a copy of which is in the reference library for the Final EIR. In January 2001, the Department of Building and Safety concurred that the methane gas observed at Playa Vista does not come from the Del Rey Storage Facility. See January 31, 2001 letter from DOGGR to the Applicant.

Further, this issue was evaluated from 2000 to 2001 by the CLA, in consultation with the City's Bureau of Engineering, the City's Department of Building and Safety, Dr. Jones, Kleinfelder, Inc., the CLA's peer reviewer, and California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. Kleinfelder concluded: "Methane detected in soil gas samples is not associated with the nearby natural gas reservoir." See February 7, 2001 report by Kleinfelder, entitled "Methane Sampling Data Assessment Playa Vista Development Los Angeles, California," p. 3. The CLA Report, Appendix J-6 to the Draft EIR, found: "The Southern California Gas Company Playa Del Rey Gas Storage facility is not the source of methane contamination found at the site. Furthermore, there is no evidence that suggests that the gas storage facility is leaking or improperly maintained. There is no evidence that the gas storage facility presents a danger to workers or future residents."

As discussed, above, numerous gas experts have analyzed the data and determined the Del Rey Storage Facility is not the source of methane at the Proposed Project site. Further study on this issue is not required.

#### **Comment 42-6**

3) Allowing Playa Capital to change the natural landscape of Phase 2 may have compromised the ability to correctly study the gas migration patterns.

**Response 42-6**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474, above.

See also Response 42-2, above.

As discussed in Subsection 2.2.4.2 of Section IV.I., Safety/Risk of Upset, of the Draft EIR on pages 714-715, several soil gas investigations, including methane sampling, were completed for the Proposed Project site. Only approximately 30% of the locations sampled for methane exhibited concentrations greater than 100 ppmv, and only 19 sampled locations exhibited methane concentrations greater than 12,500 ppmv. Also, as discussed in Subsection 4.0 of Section IV.I., Safety/Risk of Upset, of the Draft EIR on page 738, a methane safety plan, including further methane sampling, as necessary, will be developed prior to the issuance of any grading and/or building permit for the development of the Proposed Project.

Please see Topical Response TR-12, Soil Gas, on page 477, for a discussion of gas investigations at the Proposed Project site.

**Comment 42-7**

4) In the CLA Report, it was our understanding that once again Playa Capital was allowed to hire their own consultants on the gas issue. We have also been told that even worse, this time the consultants were hired through their law firm, Latham and Watkins, and asked to sign some type of “non-disclosure” agreements on the data. Is this true? We have been told that any data that Playa Capital did not want released could have been protected by attorney-client privilege, or in some manner by the attorney. Is this true?

The reason this process needs to be fully disclosed in this DEIR is that once again the City of LA is relying on the CLA Report to address the safety of building at Playa Vista.

**Response 42-7**

As discussed in Subsection 2.2.4.1.2.2 of Section IV.I., Safety/Risk of Upset, of the Draft EIR on pages 710-713, between June 2000 and May 2001, the City of Los Angeles Office of the Chief Legislative Analyst (CLA) supervised the completion of a study evaluating soil gas and other safety issues related to development at the adjacent Playa Vista First Phase Project so that the City could decide whether to provide Mello-Roos financing for some of the infrastructure related to the adjacent Playa Vista First Phase Project. A copy of the final CLA report is provided in

Appendix J-6 of the Draft EIR. The City's Department of Building and Safety asked its independent peer reviewer, Dr. Victor T. Jones III of Exploration Technology, Inc. to assist the Department with issues concerning the CLA review process. In addition, the CLA retained Kleinfelder, Inc. as the CLA's consultant, and consulted with the City's Bureau of Engineering, the City's Department of Building and Safety, the City Attorney's office, the State's Division of Gas and Geothermal Resources, the California Department of Conservation Division of Geology and Mines, and the Regional Water Quality Control Board, all of whom independently reviewed technical issues regarding the Playa Vista site. As part of that review process, the Applicant also retained its own consultants, including Dr. Kul Bhusan, Mr. Nabih Youssef, Dr. Isaac Kaplan, Dr. Kerry Sieh, Dr. Thomas Davis, Dr. James Embree, and Mr. John Sepich, regarding the myriad of issues addressed during the CLA's review process. All data and information collected as part of the CLA Report are located in the files of the City.

All soil gas data used in Section IV.I., Safety/Risk of Upset, of the Draft EIR, are provided in Appendix J of the Draft EIR.

#### **Comment 42-8**

5) If the above information is NOT TRUE, then where is the raw data that the consultants collected for the CLA Report to back up their conclusions? May we correspond with the consultants regarding the data? Our understanding is that under CEQA, the public can ask to See the raw data being used to justify the EIR conclusions.

#### **Response 42-8**

All data and information collected as part of the CLA Report are located in the files of the City. All soil gas data used in Section IV.I., Safety/Risk of Upset, of the Draft EIR are located in Appendix J to the Draft EIR.

#### **Comment 42-9**

6) In our opinion, no further construction should proceed on Phase 1, nor approval on Phase 2, until there has been an independent PEER REVIEW OF THE CLA REPORT. We have talked to several experts who say the document would never survive a peer review. And yet the City of LA is using it to put thousands of people on this site. If the CLA Report is so solid, an independent PEER REVIEW would show that. The Sage Council and Grassroots Coalition would want to be involved in the selection of the PEER REVIEWER to assure that they are truly independent.

#### **Response 42-9**

As discussed in Response 42-7, the CLA conducted an independent and public review of issues of potential concern at Playa Vista.

The remaining comments are noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

### **Comment 42-10**

7) The issues raised in the current lawsuit ETINA vs. City of LA filed in December 2001 should be fully addressed. Now is the time with a DEIR underway. The LA City Attorney can give you a list of those issues.

### **Response 42-10**

The comment refers to *Environmentalism Through Inspiration and Non-Violent Action* (“ETINA”), *et al. v. The City of Los Angeles, et al.*, Los Angeles Superior Court Case No. BS073182. The case concerned the adjacent Playa Vista First Phase Project and involves the City’s decision to “note and file” the “City Investigation of Potential Issues of Concern for Community Facilities District No. 4 Playa Vista Development Project,” prepared by the City of Los Angeles Office of the Chief Legislative Analyst (May 2001) (the “CLA Report”), which is attached as Technical Appendix J-6 to the Draft EIR. The case alleged the decision to “note and file” the CLA Report was a discretionary approval under CEQA that proposed substantial changes to the EIR for the Playa Vista First Phase Project and therefore required the circulation of a subsequent environmental impact report for the First Phase Project. On February 10, 2004, the court denied the petition and on February 24, 2004, the court entered judgment in favor of the City and the Applicant. Nonetheless, the issues raised in the case, including the existence of methane gas and postulated earthquake faults as well as soil and groundwater contamination, are discussed in Section IV.I, Safety/Risk of Upset, of the Draft EIR.

### **Comment 42-11**

#### **CULTURAL RESOURCES:**

The Ballona wetlands/Playa Vista Phase 2 site is part of the Gabrielino Indian village of Sa’angna. There are sacred burial sites that have been found at both Playa Vista and the Ballona West Bluff. This area should be saved as part of the cultural heritage of the Gabrielino’s that dates back approximately 10,000 years, as well as the history for all Angelenos. We need to save these last remaining sites for both their heritage and ours. They are important to all future generations, and it would be a tragedy to destroy them. Thank you for the opportunity to comment on the Phase 2 DEIR.

We look forward to your responses.



**Response 42-11**

Potential impacts to archaeological resources, including impacts on Native American burials, associated with the Proposed Project are addressed in Section IV.P.(2), Archaeological Resources, of the Draft EIR, beginning on page 1199. Section IV.P.(2), Archaeological Resources, of the Draft EIR identifies and discusses the potential impacts on CA LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769, and concludes, on page 1224, that implementation of the Programmatic Agreement and mitigation measures listed therein would reduce impacts on archaeological resources to a less-than-significant level.

The exact location of burials and other archaeological resources is not easily predicted, and on occasion human remains and artifacts are found during construction. As identified in the mitigation measures included in Subsection 4.0 of Section IV.P.(2), Archaeological Resources, of the Draft EIR on pages 1222-1223, efforts will be made to avoid human remains and other archaeological resources. In cases where human remains are encountered, the Applicant shall comply with the Programmatic Agreement and the requirements of the California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. The Most Likely Descendant designated by the Native American Heritage Commission for Playa Vista has provided guidelines for the handling of human remains. The guidelines would be considered in connection with the handling of Native American remains discovered during construction of the Proposed Project.

Section IV.P.(2), Archaeological Resources, of the Draft EIR on pages 1224-1225 concludes that the loss of Project-study area archaeological resources may constitute a significant cumulative impact.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 43**

Wetlands Action Network  
Post Office Box 1145  
Malibu, CA 90265

December 22, 2003

**Comment 43-1**

Wetlands Action Network, an environmental public interest organization whose mission is to protect and restore wetlands along the Pacific migratory pathways, submits the following comments with regard to the Draft Environmental Impact Report for Phase 2 of the proposed Playa Vista project, sited in the midst of the historical floodplain and estuary created by the confluence of the Los Angeles River, Centinela Creek, Walnut (Sepulveda) Creek and the Pacific Ocean at Santa Monica Bay, known commonly as the Ballona Wetlands.

One of our biggest concerns about the draft of this Environmental Impact Report is that it relies primarily on consultants who are not only paid by the developer and therefore have an inherent conflict of interest in reaching conclusions they have reached, but that several of these same consultants were relied on for information and conclusions presented to the City of Los Angeles during the Phase I review of environmental impacts and were found to have been wrong about their conclusions related to the geotechnical characterizations of the site. We ask that the City of Los Angeles hire peer reviewers to review the work of all of the consultants relied upon in this DEIR. If it is necessary in this financially challenging fiscal time for the city for Playa Vista to pay for such peer reviewers, Playa Vista should provide the funds to the City, and the City should supervise and manage all work without any oversight whatsoever from Playa Vista. It is the only way that the public's interest will be served.

Playa Vista consultants were adamant in their conclusions that the gases that citizens had detected at the site were "biogenic swamp gas" when, in fact, it has now been determined that significant amounts of thermogenic gases are present on the site, and one of the larger seeps of this gas lies directly beneath the proposed Playa Vista Phase 2 site.

**Response 43-1**

The EIR has been prepared in accordance with the requirements of CEQA, including CEQA Guidelines Section 15084. Further, the EIR has been subject to the City's review and analysis and represents the lead agency's independent judgment, in accordance with Guidelines Section 15084. Thus, no peer review is necessary.

Case law also confirms that using consultants paid by a developer is permitted under CEQA and does not inherently create the conflict of interest as suggested in the comment. See *Friends of*

*La Vina v. County of Los Angeles*, 232 Cal. App. 3d 1446 (1991). The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The comment also provides background information on the letter submitted. Comments on the Draft EIR and responses follow.

### **Comment 43-2**

#### **Changed Circumstances/New Information:**

Given that the State of California has now become the landowner of a significant amount of acreage nearby the proposed Playa Vista Phase 2 development, it is important that impacts to that land and to the planned restoration be addressed. Wetlands Action Network requests that a supplemental EIR be completed for Phase 2 and a subsequent EIR for Phase 1 be completed, since impacts to a proposed restoration of more than 600 acres of adjacent wetlands ecosystem lands was not contemplated during the completion of either of these two phases of environmental reviews.

### **Response 43-2**

None of the land sold to the State of California was part of the Proposed Project or the First Phase Project. Moreover, the Draft EIR discloses the potential sale of Area A and portions of Area B to the State. The Draft EIR in Section I.D., Project Background, on page 7, acknowledges the agreement between the Applicant and the Trust for Public Land (TPL) for the State of California to acquire all of Area A and portions of Area B for long-term open space/recreation uses as well as the exclusion of Area C from the Playa Vista planning area. Consistent with the TPL Agreement, the State acquired this property in December 2003. At this time, the State has not determined the actual use of or proposed a specific project for these areas. The sale of Area A and a portion of Area B to the State does not alter the previously approved First Phase Project; therefore, the impacts of the First Phase Project as evaluated in the 1993 EIR and 1995 Mitigated Negative Declaration/Addendum remain unchanged. Further, the sale does not alter any component of the Proposed Project; therefore, the impacts discussed in this Draft EIR for the Proposed Project remain unchanged. The DEIR analyzes impacts of the Proposed Project, if any, on these areas as they currently exist. These areas are geographically separated from the Proposed Project by the First Phase Project Area as well as other urban development. As discussed in Subsection 3.3.3 of Section IV.D, Biotic Resources, of the Draft EIR on pages 543-545, the Proposed Project is expected to have a less than significant impact on downstream wetland habitats in Area B. CEQA does not require preparation of either a Supplemental or a Subsequent EIR unless changes in a Proposed Project or the affected environment might alter impacts discussed in the Final EIR certified for the Proposed Project. In this case, a Final EIR has not been certified for the Proposed Project, and no changes in the Proposed Project or the affected environment have occurred. Accordingly, neither a supplemental EIR for the Proposed Project nor a subsequent EIR for the First Phase Project are required.

**Comment 43-3**

Please make changes that reflect new ownership that is now inaccurate in the Executive Summary and elsewhere in the draft EIR.

**Response 43-3**

The sale of Area A and a portion of Area B to the State of California occurred after the circulation of the Draft EIR. The Executive Summary will be revised to reflect the sale of Area A and portions of Area B to the State of California and the exclusion of Area C from the Playa Vista Planning Area.

Please Refer to Section II.1, Corrections and Additions, of the Final EIR for a revision to the Draft EIR regarding the above comments.

**Comment 43-4****Cumulative Impacts:**

Due to the planned expansion and revitalization efforts being undertaken at the Marina by the County of Los Angeles, as well as expansion planned at Los Angeles International Airport (LAX), a thorough review is in order of all of the cumulative impacts of these developments combined with Phase 1 and Phase 2 of the proposed Playa Vista development. Please explain why this has not yet been accomplished and how the public and decision-makers are to adequately understand the changes and impacts they will endure if such cumulative impacts are not fully analyzed and considered. A list of “related projects”—no matter how exhaustive—does not detail the cumulative impacts that are required to be fully analyzed according to the California Environmental Quality Act (CEQA.)

**Response 43-4**

Each of the Environmental Topics in Sections IV.A through IV.P.(3) of the Draft EIR includes a Cumulative Impacts analysis that has been prepared according to guidance established in Section 15130 of the State CEQA Guidelines. The use of Related Projects lists is an acceptable methodology pursuant to Section 15130(b)(1)(A). The Draft EIR includes a related projects list that is presented in Table 5 on page 195, with the location of the related projects illustrated in Figure 11 on page 194. The list includes anticipated Marina del Rey development, Related Projects 37.a. through 37.s., the LAX Master Plan, Related Project 34, and the Playa Vista First Phase Project, Related Project 40. The application of the related projects list, and, where appropriate the use of additional data such as modeling or regional projections, is described within each section of the Draft EIR.

**Comment 43-5****Size and Scope of Project:**

Please explain why there is commercial (office & retail) space included in this part of the Playa Vista development when approximately 4 million sq. ft. of commercial space was approved at Playa Vista and to date no tenant has been found for most of the commercial space approved in 1995.

Please explain in detail what is contemplated in the proposal for 200 assisted living units to be included in Phase 2.

Please explain why the developer could not design the development so it can comply with current General Plan and Specific Plan mandates, and instead will require amendments to these plans.

**Response 43-5**

The Proposed Project reflects the current realities of a severe housing shortage and would improve the jobs-housing balance. The proposed commercial space would provide small professional offices, and neighborhood-serving retail uses, uses not included in the First Phase Project. The Draft EIR has evaluated the potential impacts of the Proposed Project across 34 environmental topics and sub-topics. In particular, the Draft EIR evaluates the proposed amendments to the existing Community/District Plan and Area D Specific Plan provisions in Subsection 3.4.1.1.4.2 of Section IV.G, Land Use, on page 636. In addition, the Draft EIR analyzes the environmental impacts that would occur from a project that complies with the existing Specific Plan and compares those impacts with those of the Proposed Project in Section VII, Alternatives, of the Draft EIR. Within the analysis of Alternative 2, No-Project – Development Permitted by Existing Specific Plan and Zoning, pages 1278 through 1299 address a scenario under which no amendments to the Specific Plan would occur. Alternative 3, Existing Specific Plan – Buildout, on pages 1300 through 1323 addresses a scenario in which an amendment to adjust zone boundaries would occur, but the existing amounts of development permitted would be built.

As described in Table 185, on page 1261 of the Draft EIR, development under Alternative 3 would consist of 1,758,050 sq.ft. of office uses, 615,000 sq.ft. of retail uses, and 600 hotel rooms. This represents over 900 percent more office space and 310 percent more retail uses than the Proposed Project; in addition, the Proposed Project would eliminate the 600 hotel rooms allowed under the existing Plans. The Applicant could design a development consistent with this alternative; in contrast, the Proposed Project has been designed to create a mixed-use, predominantly residential community that would represent a substantial reduction in intensity when compared with the remaining land uses permitted under the existing General Plan and Specific Plan.

“Assisted Living Units” generally refers to a living arrangement in which personal care services (e.g. transportation, meals and housekeeping) are available as needed to people who still live on their own in a residential facility.

Please note that the amount of commercial space cited in the above comment is incorrect. The previously approved First Phase Project includes 3,280,000 sq.ft. of office/studio related uses and 35,000 sq.ft. of retail space.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 43-6**

#### **Need for Additional Alternative to be Studied—“Ballona Centinela Creek Park”:**

While Seven Alternatives have been selected for study by this Draft EIR, Wetlands Action Network requests that an eighth alternative be considered seriously, especially in light of the fact that no tenant has been found for the previously approved DreamWorks site to the east of the proposed Phase 2 development and the State of California’s clear interest in acquiring and restoring land in the Ballona Valley floodplain.

This eighth alternative would consider the proposed Phase 2 land to be similar to Alternative 1, which includes no development, but would [*sic*] instead of producing “no change to the existing physical condition and use of the Project site,” Alternative 8 would propose a larger riparian corridor, restored prairie grasslands and a combined passive and active open space park. The same uses would be considered for the previously approved commercial space for the previously planned DreamWorks’ campus, so that both parcels of land—the proposed Phase 2 and the former DreamWorks’ campus would be combined to create the “Ballona Centinela Creek Park.”

If this alternative were considered, net beneficial effects would be significantly better than those included in Alternative 1. This alternative would no doubt become the environmentally superior alternative.

### **Response 43-6**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The selection of Alternatives was based on guidelines presented in Section 15126.6 of the State CEQA Guidelines. As indicated in Section 15126.6(a), “an EIR shall describe a range of reasonable alternatives to the project...an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” The Draft EIR analyzes a reasonable range of alternatives in Section VII, Alternatives.

As further described in CEQA Guidelines Section 15126.6(c), the reasons for rejecting alternatives from detailed consideration include the following: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.” The Draft EIR discusses the selection of alternatives and identifies alternatives considered but rejected, including a Regional Park, Habitat Restoration option alternative, in Subsection 3.2 of Section VII, Alternatives, on page 1263. As indicated, such an alternative would fail to meet nearly all of the Proposed Project’s basic objectives, there is no indication that funding for such an alternative would be available, and implementation of this alternative is considered speculative. Therefore, this alternative was subsequently rejected from further analysis.

### **Comment 43-7**

#### **Alternative Site Analysis Inadequate:**

Not only should there be additional alternative site analyses completed (one poorly chosen site is not adequate), but the conclusions reached in analyzing the one site selected is based on faulty information. It is not true that there would be a “loss of investment” as the current developers of Playa Vista were able to obtain the entire Playa Vista parcel on a short-sale due to Maguire Partners’ serious financial problems prior to the purchase in 1997. The entire parcel was purchased for a little more than \$100 million. In addition, the developers are receiving a huge windfall of funding (\$139 million) from the recent purchase of 193 acres of land previously planned for development. Some of this money could easily be invested in a better location for a solid redevelopment project near a transportation hub with far fewer risks, hazards and negative environmental impacts.

### **Response 43-7**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR describes the process used to select the Alternative site in Subsection 4.7.2 of Section VII, Alternatives, of the Draft EIR on page 1391. As indicated, a specific methodology was applied to identify alternative sites. Based on the methodology described in Subsection 4.7.2, an alternative site was selected and analyzed in Subsection 4.7.2, in Section VII, Alternatives, of the Draft EIR on page 1391.

This Project site is an infill site with regional infrastructure in place, and has previously been used for industrial purposes including a former aircraft facility and related runway.

### **Comment 43-8**

#### **Additional Comments on Specific Sections of Draft EIR:**

## 1. EARTH

### Dewatering

It is unclear what the impacts of dewatering in Phase 1 of Playa Vista have been to date and whether or not increased dewatering in a high-water table area will cumulatively cause impacts unanticipated in this draft EIR. Please explain the results of any monitoring of these impacts, and if there has not been monitoring, please institute a study of these impacts so the results can be analyzed and forecast for Phase 2 and for Phases 1 and 2 cumulatively.

### Response 43-8

As stated in Subsection 3.4.1.2 of Section IV.A., Earth, of the Draft EIR 252, construction dewatering in the Playa Vista First Phase Project has been successfully completed in accordance with RWQCB requirements for a number of years. Permanent dewatering systems to protect subsurface structures (i.e., subsurface parking garages, etc.) that may occur would be “contingent” systems that would operate only as groundwater elevations occur at the level of the dewatering pipes. Drainage pipes will be connected to a sump to maintain the groundwater level at the target elevation. Discharges from these systems are anticipated to be sporadic; however, a conservative analysis, assuming every structure in the Proposed Project would include a dewatering system, suggests that a daily flow of up to 1.8 to 2.4 acre-feet could be discharged from these systems. Furthermore, as stated in Subsection 2.2.2.4 of Section IV.A., Earth, of the Draft EIR, groundwater extraction currently occurring as part of remediation activities within the Proposed Project site and the adjacent Playa Vista First Phase Project site is not substantial and is not anticipated to result in ground subsidence on- or off-site. There is no evidence from the Playa Vista First Phase Project that the construction and permanent dewatering has resulted in any subsidence.

### Comment 43-9

### Flood Hazard Zone

Please explain how the proposed Playa Vista phase 2 site was curiously left out of flood hazard maps, especially given the fact that this entire site is in a known historical floodplain and is considered to be “high-risk liquefaction” area by the State of California. Given the proximity to the coast, the sea-level-like elevation and the extremely high water table, this area seems to be begging to be considered as a flood hazard zone, especially as more and more impervious surface is being added to the Ballona Valley region.

### Response 43-9

As addressed in Subsection 2.1.1.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 345, according to the Flood Insurance Rate Map (FIRM) from the Federal Emergency Management Agency (FEMA), the Project site falls into two different flood zones. The bluff portion of the Habitat Creation/Restoration Component is classified as Zone C – areas of minimal flooding, not



requiring flood insurance. The remaining portions of the Proposed Project (Urban Development Component and the Riparian Corridor portion of the Habitat Creation/Restoration Component) are in Zone B – areas between the limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with an average depth of less than one foot; or where the contributing drainage area is less than one square mile; or areas protected by levees from the base flood. No areas of the Proposed Project site are located within Zone A (100-year flood zone) as determined by FEMA. The FIRM flood zones for the Proposed Project are shown on Figure 25 of Section IV.C.(1), Hydrology, of the Draft EIR on page 347. It should be noted that within the immediate vicinity of the Proposed Project, only the area within the Ballona Channel has been classified on the FIRM map as Zone A.

FEMA engineers and cartographers conduct engineering studies referred to as Flood Insurance Studies (FISs) to delineate Special Flood Hazard Areas (SFHAs), which are those areas subject to inundation by a flood that has a 1-percent or greater chance of being equaled or exceeded during any given year, otherwise known as a base flood. This information and other flood risk information regarding historic, meteorologic, hydrologic, and hydraulic data, as well as open-space conditions, flood control works, and development are used to develop FIRMs.

Relating to liquefaction hazards at the site, as discussed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256, there exists moderate liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. Geotechnical studies (such as Appendix D-11 of the Draft EIR) have indicated that because of the scattered nature and relatively small size of the lenses found at the Playa Vista site, there would be a limit in the extent of liquefaction. Nonetheless, the City Department of Building and Safety (LADBS) requires site-specific geotechnical investigations, including liquefaction risk assessments, for issuance of building permits for individual structures. Further, the application of engineered fill soils in building pads would address the potential for liquefaction directly under structures. Hence, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

#### **Comment 43-10**

##### **High-risk Liquefaction Area**

It is disingenuous and erroneous to state conclusions that “the potential for adverse effects from liquefaction is minimal” since the State of California released new maps subsequent to the certification of the Phase 1 EIR that shows the entire Playa Vista Area D landmass is located in a “high-risk liquefaction zone.” Please correct the information and the conclusions in this draft EIR to reflect this designation.

#### **Response 43-10**

The commentator overstates the potential liquefaction hazard at the Proposed Project site by using the term “high-risk liquefaction zone,” as there is no such zone designation. The City of Los Angeles’ Safety Element does show the Proposed Project site in an area susceptible to

liquefaction, and the State of California, Seismic Hazard Map Program identifies the Proposed Project site in an area where there has been historic occurrences of liquefaction that requires investigation. As addressed in Subsection 2.2.2.5 of Section IV.A, Earth, per the City of Los Angeles Department of Building and Safety, site-specific liquefaction investigations must be carried out for individual projects. From these investigations, the appropriate safety standards and measures that would adequately address liquefaction potential would be incorporated in project plans.

### **Comment 43-11**

#### **Geotechnical Information**

Please explain why the City of Los Angeles is still relying on geotechnical reports by Law Crandall from earlier than 2001 in light of the following:

Law Crandall is the firm that:

1) inaccurately characterized the geotechnical features of the proposed Belmont High School area wherein more recent studies showed a serious geologic fault running directly underneath the school site;

2) was listed by LAUSD audit officials as one of the companies who might be liable for serious wrong-doing based on geotechnical studies that did not properly characterize the geotechnical conditions at the Belmont site, nor the resulting potential hazards to the community;

and perhaps most importantly

3) inaccurately characterized the geotechnical conditions of Area D of the proposed Playa Vista site as having only biogenic gas conditions and not thermogenic gas conditions, as were subsequently found to be inaccurate by a peer reviewer hired by the City of Los Angeles, Dr. Victor Jones. (Dr. Jones found significant amounts of thermogenic gases—a charge made during Phase I EIR comments by Tom Hayden and others, but dismissed by the City at the time, relying on reports by Law Crandall and other Playa Vista consultants.)

Given the obvious flaws and inaccuracies now known from the reports relied on in Phase 1, why are these same reports being relied on for Phase 2, and what additional information that is being relied on might now be also called into question and deemed unreliable by decision-makers (including the Los Angeles City Council) based on the history of inaccurate geotechnical findings of Playa Vista's consultants?

### **Response 43-11**

The Draft EIR analyses of geotechnical (earth) and safety/risk of upset are based on numerous studies prepared by several different firms. The more recent studies, including the studies performed by Exploration Technologies, Inc. (ETI), Group Delta Consultants (GDC), and Camp

Dresser & McKee (CDM), included as Appendices to the Draft EIR, incorporated various technologies and methods to study the geotechnical/geochemical characteristics of the Project site. The geotechnical reports completed by Law/Crandall (and Leroy Crandall and Associates) were not the only geotechnical studies used, but were used in addition to recent studies to characterize the physical conditions at the Proposed Project site.

### **Comment 43-12**

Please explain why the City of Los Angeles is still relying on geotechnical reports by, Group Delta Consultants or Camp Dresser & McKee, Inc. in light of the fact that conclusions drawn by both of these firms related to the characterization of the geotechnical conditions at the proposed Playa Vista Phase 2 site were proven to be inaccurate based on the reports by the peer reviewer hired by the City of Los Angeles, Dr. Victor Jones.

### **Response 43-12**

As indicated in the CLA Report, Appendix J-6 of the Draft EIR, reports by Group Delta Consultants and Camp, Dresser & McKee, Inc. were included in the data bases and analyses for the CLA Report. The conclusions of these firms were not proven to be “inaccurate.”

There have been six lawsuits challenging the sufficiency of the First Phase Project EIR under CEQA since 1993. None of the challenges has succeeded. On February 10, 2004, the Honorable George Wu of the Los Angeles Superior Court denied a petition for writ of mandate which requested a Subsequent EIR for the First Phase Project based on the discovery of methane gas and the classification of the First Phase Project site as a liquefaction zone. See *Environmentalism Through Inspiration and Non Violent Action et al. v. the City of Los Angeles, et al.*, Los Angeles Superior Court case No. BS070757. Please see Topical Response TR-13, First Phase Project Litigation History, on page 482.

A detailed discussion regarding methane is provided in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 700. This issue is also addressed in Topical Response TR-12, Soil Gas, on page 477. As discussed in Subsection 2.2.4.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 710-713, between June 2000 and March 2001, the CLA conducted an independent and public review of issues of potential concern at Playa Vista. As part of the Chief Legislative Analyst (CLA) review process, the City’s Department of Building and Safety asked its independent peer reviewer, Dr. Victor T. Jones III of Exploration Technology, Inc. (“ETI”) to assist the Department with issues concerning the CLA process. In addition, the CLA retained Kleinfelder, Inc. as the CLA’s consultant, and consulted with the City’s Bureau of Engineering, the City’s Department of Building and Safety, the City Attorney’s office, the State’s Division of Gas and Geothermal Resources (“DOGGR”), the California Department of Conservation Division of Geology and Mines, and the Regional Water Quality Control Board (“RWQCB”), all of whom independently reviewed technical issues associated with the Playa Vista site. As part of that review process, the Applicant also retained its own consultants, including Dr. Kul Bhusan, Mr. Nabih Youssef, Dr. Isaac Kaplan, Dr. Kerry

Sieh, Dr. Thomas Davis, Dr. James Embree, and Mr. John Sepich, regarding the issues addressed during the CLA's review process.

### **Comment 43-13**

#### **Toxic mold**

Please explain what will be done to prevent toxic mold from appearing during construction of Phase 2, when during construction of Phase 1 already such mold has been observed and reported to OSHA by contractors working at the site. Given the nature of the geography in the Ballona Valley (Area D is an area that regularly "holds" marine fog layers), the fact that construction work is planned to continue during the rainy season and the presumably similar construction methods planned for Phase 2 as Phase 1, please explain what will prevent the mold from being a hazard to workers and future residents and workers.

### **Response 43-13**

The presence of mold is a common occurrence at construction projects throughout southern California. The Proposed Project would be no different. Industry standard construction practice, which the project will incorporate, includes measures to prevent the development of mold, such as pre and post construction treatment of framing lumber, and measures to remediate any damage caused by mold should it occur as a result of unintended water intrusion or plumbing discharge. Removal of affected areas, dehumidifying, bleaching and accelerated heat drying are a few of the available mitigation techniques commonly employed to remediate and mitigate the risk of further mold growth.

### **Comment 43-14**

#### **High-risk Liquefaction Zone**

The conclusion reached in the EARTH section that the proposed project would not result in any significant impacts is not accurate, as it is based on inaccurate information. Exposure of people to substantial risk of injury is inevitable in a high-risk liquefaction zone in "earthquake country," and this entire proposed project site lies in the midst of what the State of California has deemed to be a "high-risk liquefaction zone."

### **Response 43-14**

This comment is addressed in Response 43-9, above, regarding liquefaction hazards at the Proposed Project site and associated measures to reduce potential liquefaction risks to on-site people and structures.

**Comment 43-15****2. AIR QUALITY**

Please explain why it is “unavoidable” to have adverse impacts in this category when there is a possibility for avoiding these impacts by selecting either Alternative 1 or Alternative 8, as discussed above.

**Response 43-15**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Section VII, Alternatives, of the Draft EIR, Alternative 1 does not meet the Project’s basic objectives, whereas an alternative similar to the proposed “Alternative 8,” the development of a regional park, was considered and deemed infeasible. Furthermore, pursuant to CEQA Guidelines Section 15126.6(a), the Draft EIR analyzes a reasonable range of alternatives. Please refer to Response 43-6 for a detailed discussion regarding the alternatives referenced in this comment.

**Comment 43-16****3. WATER RESOURCES—HYDROLOGY:**

Please explain how the increase in pavement of floodplain lands atop a very high water table leads to a conclusion that the development will not adversely impact the groundwater hydrology or potential flood damage to surrounding homes and businesses.

**Response 43-16**

Project impacts to groundwater hydrology are addressed in Subsection 3.4.2 of Section IV.C.(1), Hydrology, of the Draft EIR on page 388. As discussed in that subsection, implementation of the Project’s Urban Development Component would include the addition of impervious surfaces. The conversion of surfaces from pervious to impervious due to development of the Proposed Project has the potential to reduce groundwater recharge by approximately 12 acre-feet per year. The introduction of additional landscape irrigation is estimated to produce approximately 18 acre-feet per year; therefore, there would be a net increase of 6 acre-feet per year of groundwater recharge. If high groundwater is determined to be present, temporary and permanent dewatering systems would be constructed. The Project was found to not have a significant impact relating to groundwater hydrology.

Potential flooding issues are addressed in Subsection 3.4.1.1.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 374. As discussed in this subsection, although the development of the

Project's Urban Development Component would result in increased amounts of impervious surface that consequently would increase stormwater runoff flowing into adjacent waterbodies, the increase is not significant because the runoff would be detained in the Freshwater Wetlands System, which was designed partially for stormwater management. Also, the proposed drainage system for the Proposed Project and the adjacent Playa Vista First Phase Project has been designed to convey increases in stormwater runoff and provide an appropriate level of on-site flood protection, detention and drainage, such that no significant impact is anticipated.

#### **Comment 43-17**

#### **4. WATER RESOURCES—WATER QUALITY:**

Please explain how the proposed Phase 2 Playa Vista development will meet current Regional Water Quality Control Board standards and requirements to treat all runoff on-site before being allowed to flow into a "Waters of the United States," which the fresh water marsh now clearly is due to its status as restoration mitigation for destruction of wetlands in Area D.

#### **Response 43-17**

The issue raised in this comment relates to the original permit decisions, construction goals and objectives of the Freshwater Wetlands System (inclusive of the Riparian Corridor and the Freshwater Marsh). The development of the Freshwater Wetlands System was required as the result of a court-approved settlement reached between the Applicant's predecessor-in-interest, the Friends of Ballona Wetlands, and the City, among others, in 1994. (*Friends of Ballona Wetlands v. California Coastal Commission, et al.*, No. C 525 826 (Los Angeles Sup. Ct., stipulation filed June 9, 1994).) A state court upheld the propriety of using that settlement as a basis for design of the Freshwater Wetlands System. (*Save Ballona Wetlands v. City of Los Angeles, et al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994).) The parties agreed to a reduced Playa Vista project plan (including the Proposed Project), as well as construction of the 52-acre Freshwater Wetlands System to accommodate the storm water drainage of areas tributary to it. The parties to the settlement agreed that one of the key purposes of the Freshwater Wetlands System was to cleanse storm water from Area D of the Playa Vista Project (the Proposed Project and the First Phase Project) as well as certain off-site tributary areas before it emptied into adjacent waters.

The entire Freshwater Wetlands System, including the Freshwater Marsh and the entire Riparian Corridor, was studied as part of the Draft EIR for the First Phase Project (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510 (certified by the City of Los Angeles in Sept. 1993). (See Section V.C.1, Hydrology, and Section V.C.2.B, Surface Water, of the Draft EIR for the First Phase Project on pages V.C.1-7 to 1-12 and V.C.2.B-19 to B-30, respectively.) In addition, the Draft Program EIR for the Master Plan Project, which included development of Areas A, B, C, and D of the former Playa Vista Planning Area, was circulated by the City in 1992 as an informational document to disclose cumulative impacts (along with the Draft EIR for the First Phase Project). The Draft Program EIR for the Master Plan Project also discussed the entire

Freshwater Wetlands System. (See Section V.C.1, Hydrology, and Section V.C.2.B, Surface Water, of the Draft Program EIR for the Master Plan Project on pages V.C.1-17 to 1-23 and V.C.2.B-27 to B-31, respectively.)

The City's decision to plan for a subsequent phase of Playa Vista in addition to the construction of the First Phase Project has been upheld by the courts. (See *Save Ballona Wetlands v. City of Los Angeles, et. al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994).)

Although the City's approval for the construction of the middle segment of the Riparian Corridor adjacent to the Village area is requested as part of the current review process, the Army Corps of Engineers, the California Department of Fish and Game, and the Regional Water Quality Control Board, Los Angeles Region (RWQCB), have approved the entire Freshwater Wetlands System, including the Riparian Corridor. The California Coastal Commission has approved and issued permits for those portions of the Freshwater Wetlands System within the coastal zone. Further, these approvals have been upheld by the courts. (See *Wetlands Action Network v. United States Army Corps of Engineers, et. al.*, 222 F.3d 1105 (9th Cir. 2000), cert. denied, 534 U.S. 815 (2001) (challenge to the Army Corps of Engineers Section 404 permit); *Save Ballona Wetlands v. City of Los Angeles, et. al.*, No. SS009077 (Los Angeles Sup. Ct., decision filed Aug. 23, 1994) (challenge to the City's EIR for the First Phase Project); *Earth Trust Foundation, et. al v. City of Los Angeles, et. al.*, No. SS006405 (Los Angeles Sup. Ct., decision filed August 18, 1996), affd. No. B106408 (Ct. App. 2nd App. Dist., decision filed May 15, 1997) (challenge to the City's Addendum to the EIR for the First Phase Project).)

Since issuance of the 404 Permit in 1992, the overall development, including the Proposed Project, has been scaled down significantly. In light of the lesser development currently planned with the sale of Area A and part of Area B to the State in December 2003, the Army Corps determined in 2003 that the Riparian Corridor and the pre-treatment areas of the Freshwater Marsh were not necessary for mitigation. Further, the Corps clarified there was "no need for the 51.1-acre freshwater wetland system to be subject to numerical water quality standards as waters of the United States." (July 18, 2003, Letter from U.S. Army Corps of Engineers, Note 111, Section 3, Subsection 3.2.3.1, page 3-30, of Appendix F-1, included in the Appendices to the Final EIR.) Use of the Freshwater Wetlands System as a treatment control within the Standard Urban Stormwater Management Program outlined by the county-wide municipal stormwater NPDES permit is discussed in Subsection 3.4.1.2.1 on page 464 of Section IV.C.(2), Water Quality, of the Draft EIR.

### **Comment 43-18**

In addition, please explain why an alternative cleansing detention basin has not been identified and determined to be required to be located within the boundaries of the proposed Phase 2 development, given the requirements now not only required by the Los Angeles Regional Water Quality Control Board, but determined by the State Water Resources Control Board to be required even after an appeal was raised by Playa Vista and Latham & Watkins on Playa Vista's behalf.

**Response 43-18**

As described fully in Subsection 3.4.1.2.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 466, and in Table 3-22 of Appendix F-1 of the Draft EIR, the Proposed Project is fully compliant with requirements established by the RWQCB through the Municipal Storm Drain permit and through the City of Los Angeles in its regulations implementing that permit without the need to construct an alternative cleansing detention basin within the boundaries of the Proposed Project, as suggested by the commentor. Furthermore, the RWQCB issued a letter to Playa Capital dated January 16, 2003 (a copy can be found in the Appendix to the Final EIR) clarifying the manner in which the Municipal Storm Drain permit applied to the Proposed Project that lead to Playa Capital's dismissal of its petition challenging that permit. (Please see Note 111 of Section 3 of Volume I of Appendix F-1 of the Draft EIR). In that letter, the RWQCB stated that the treatment methodology (including the Freshwater Wetlands System) were compliant with the applicable provisions of the federal Clean Water Act and that the RWQCB had preliminarily concluded that the treatment program met either the individual project requirements of the Municipal Storm Drain permit or qualified for an individual Project-substitute regional solution, as allowed by the that permit. Lastly, the Municipal Storm Drain permit and its provisions related to BMPs at new development focus on practicable approaches to controlling pollution (See letter from Francine Diamond, RWQCB, to General Public, January 30, 2002, in the reference library of the Final EIR; and Note 44 of Section 3 of Volume I of Appendix F-1 of the Draft EIR). The Freshwater Wetlands System and other water quality treatment BMPs incorporated into the adjacent Playa Vista First Phase Project and Proposed Project comply with the requirements of the Municipal Storm Drain permit and its implementing programs including the practicality standard applied to such requirements.

**Comment 43-19****5. BIOTIC RESOURCES:**

Please explain why the Playa Vista developers were allowed to remove trees in the proposed Playa Vista Phase 2 area where it had been established for several years that Red-tailed Hawks had been nesting, well-known to Playa Vista developers and documented by a television news broadcast? How was this allowed when a final Environmental Impact Report had not yet been properly reviewed nor certified?

**Response 43-19**

It is unclear to which tree removal the commentor refers. If the commentor refers to the removal of eucalyptus trees next to Jefferson Boulevard in February 2002, the removal of eucalyptus trees does not require the preparation of an environmental impact report. At the time of the removal, an arborist determined several of the eucalyptus trees were diseased and threatened the safety of Jefferson Boulevard. One of the trees had fallen and posed a traffic safety hazard to drivers along Jefferson Boulevard. Based upon numerous site visits, biologists determined there were no nesting birds at the time of the removal.



As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase Construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

**Comment 43-20**

Please explain also why the Playa Vista developers were allowed to rip out and destroy wetland vegetation (Willow thickets and pocket wetlands) in significant amounts prior to analysis and certification of an Environmental Impact Report? Why was this allowed in Phase 2, but not what was done for Phase 1?

**Response 43-20**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase Construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

**Comment 43-21**

Why has significant illegal grading and degradation of land been allowed by the City of Los Angeles on Phase 2 lands before an EIR is certified, before grading permits have been granted? Wildlife has been chased out of the area, in large part, due to these activities.

**Response 43-21**

Please see Response 43-20, above.

**Comment 43-22**

Playa Vista should be required to restore the area of Phase 2 to the condition it was in when Phase 1 of Playa Vista was approved before the EIR is certified.

**Response 43-22**

The First Phase Project was addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 900010510), certified by the City of Los

Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. There is no legal requirement under CEQA or any other law that requires restoration of the Proposed Project site to its condition in 1993.

### **Comment 43-23**

Please explain how “Habitat creation” works (when undertaken by a developer, as opposed to Mother Nature).

### **Response 43-23**

Subsection 3.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 545 states: “construction of the Project’s Riparian Corridor would replace 6.7 acres of pavement, structures, and storm drain (0.2 acre of Centinela Ditch) with native riparian habitat and native grassland.” As this statement indicates, one purpose of the Riparian Corridor is to enhance habitat values over existing conditions. A second purpose, indicated by Subsection 3.4.1.2.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 385 is to “provide an appropriate level of on-site flood protection, detention, and drainage.” A third purpose, indicated by Subsection 2.1.1.4 of Section IV.C.(2), Water Quality, of the Draft EIR on page 410 is to “improve the quality of urban runoff entering the Ballona Wetlands and Santa Monica Bay, reducing existing water quality impacts to the area and aiding in the national program for improvement of water quality from urban runoff.”

The landscaping and design for the Riparian Corridor is found in the three volume Habitat Mitigation and Monitoring Plan (HMMP), which is available in the reference library for the Draft EIR. Chapter 2, page 1 of the HMMP states that the Freshwater Wetlands System (inclusive of the Riparian Corridor) will contain 4 habitat types—open water, Freshwater Marsh, willow scrub woodland, and a mixed riparian community. In addition, under the HMMP, the performance of the habitat of the Riparian Corridor is analyzed based on the number and diversity of bird species as well as the health of the vegetation within the four habitat types, described above. The HMMP was developed to describe the habitat goals and water-related issues necessary to establishing and maintaining the habitat in the Freshwater Wetlands System. It was approved by the Army Corps of Engineers, and the California Department of Fish and Game.

As indicated in Subsection 3.3.3 on page 544, monitoring data contained in the Ballona Freshwater Marsh Annual Report, December 2003, have demonstrated rapid colonization of the habitat by wildlife, with the number of breeding bird species significantly greater than expected for a newly constructed habitat. This information indicates that the habitat is either already established (Freshwater Marsh) or scheduled for establishment (First Phase of the Riparian Corridor) prior to impacts of the Proposed Project. As also stated in Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 547, the Riparian Corridor component of the Freshwater Wetlands System is expected to have a beneficial effect of establishing a native wildlife habitat corridor in place of the fragmented, largely non-native vegetation that currently exists.

**Comment 43-24**

Please explain, in light of last year's release of a report by the National Academy of Sciences on the dismal failure of wetland restoration nationwide, how a "wetland restoration program" will be guaranteed to be successful.

**Response 43-24**

For the purpose of this response it is assumed that the commentor is referring to a National Academy of Sciences report, entitled "Compensating for Wetland Losses under the Clean Water Act," published by the National Academy Press in 2001. Contrary to the commentor's statement, this report did not characterize wetland restoration nationwide as a "dismal failure." Rather, the report critically reviewed case studies of wetland mitigation and provided recommendations for improving success of wetland creation projects. The Ballona Freshwater Wetlands System, of which the Riparian Corridor will be a part, is anticipated to be successful based on the recent Ballona Freshwater Wetlands Annual Report, December 2003 (a copy is included in the reference library of the Final EIR) and the fact that design of the Freshwater Wetlands System has incorporated many elements consistent with the Academy's recommendations. These elements include: a watershed approach to understanding wetland function; an understanding of biological dynamics of the area; incorporation of hydrological variability; proper placement of vegetation with respect to planting elevation, depth, soil type, and seasonal timing; early monitoring as part of adaptive management. See Academy report, pages 3 to 5.

**Comment 43-25**

What ever became of the Burrowing Owls that were once observed on the project site?

**Response 43-25**

A burrowing owl was reported to occur in areas adjacent to Area D in surveys by Ken Corey in 1990 and 1991. This study is cited in Table 2-1 in Appendix G-2 of the Draft EIR. On page 28 of his 1991 report, Mr. Corey states that the burrowing owl was observed in association with iceplant vegetation below the LMU sign in April of 1990. This location is above Cabora road and outside the Proposed Project site. No burrowing owls have been observed on the Proposed Project site in subsequent surveys.

**Comment 43-26**

It is absolutely un-true that "sensitive species that utilize the Ballona Wetlands do so in the presence of busy streets and lighting." For many, many years there has been no street lighting surrounding the 1,087+ acre Ballona Wetlands ecosystem. It is only with the advent of Phase I of Playa Vista that some limited street lighting has entered the picture, and the streets are becoming

busier, yet what is the point of no return of impacts that will harm these species? Please correct this inaccurate assumption that may have colored the conclusions in this section. Street lighting and nearby automobile traffic cause significant harm to wildlife, as evidenced by numerous scientific studies.

**Response 43-26**

For years, Jefferson Boulevard, Lincoln Boulevard and Culver Boulevard have carried traffic through and adjacent to the Ballona Wetlands. Further, the surrounding area is urbanized and Southern California Gas Company maintains a facility in Area B with lighting. Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on page 548 concludes that there may be indirect impacts on sensitive species in the Habitat Creation/Restoration component from lighting, noise, and pets. These sensitive species would be anticipated to utilize habitat established as part of the Habitat Creation/Restoration component of the Proposed Project. As a result, the Draft EIR on page 551 proposes mitigation measures to address these impacts, including fencing along the north side of the Riparian Corridor, native landscaping to reduce headlight glare and noise, directing night lighting away from the restored areas, and signage to inform people of the sensitive habitat.

**Comment 43-27**

It is also un-true to state that human and pet intrusion “would not be expected to diminish long-term chances for survival of... species.” It is exactly that impact—the impact of intrusion natural habitats by humans and our domestic animals—that has displaced and caused the extinction of numerous species on the planet.

**Response 43-27**

Please see Response 43-26, above.

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 43-28**

The only reason that this report can conclude that there will be no unavoidable impacts on biological resources, with the exception of raptor foraging habitat and nesting habitat for migrating birds (which we would not characterize as the draft EIR has as “marginal”), is because the developers were allowed to destroy much of the habitat without any permits for vegetation removal or grading. This is a travesty and should be addressed in the final EIR.

**Response 43-28**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase Construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474. As discussed in the referenced Topical Response, since at least 1987, the City has issued dozens of permits to allow over 2,000,000 cubic yards of stockpiling of construction dirt in the Proposed Project site to support construction activities for the First Phase Project. As indicated in historical photographs of Area D contained in Building and Safety Commissioner File No. 030128 (included in the reference library for the Final EIR) by 1994, a large stockpile, in part composed of dirt from construction excavations at Loyola Marymount University, covered the northern half of the Proposed Project site.

**Comment 43-29**

When was the last time Cooper's Hawk was surveyed for in trees along the bluff slope? Our biologist documented nesting by this bird in Phase 2 areas last spring. Please do not allow Playa Vista to destroy trees in this area where the Cooper's Hawk has been nesting even if it is not nesting season.

**Response 43-29**

Trees along the bluff slope are located at the top of the bluff near Loyola Marymount University and outside the Proposed Project site. The commentor's claim that Cooper's hawk nests near the site of the Proposed Project will be incorporated into the Final EIR for review and consideration by decision-makers.

**Comment 43-30**

Please include records for breeding birds in this area from the Breeding Bird Atlas.

**Response 43-30**

Breeding Bird Atlases generally cover large regions such as counties or states. Currently, there is no published Breeding Bird Atlas for Los Angeles County in general or the region of the Proposed Project site in particular. However, while not comprising an "atlas" as such, all available occurrence data regarding bird species in the Ballona region was reviewed and considered in the Draft EIR. A list of those studies can be found in Table 2-1 of Appendix G-2 of the Draft EIR. As discussed in Subsection 5.0, Section IV.D, Biotic Resources, on page 551 of the Draft EIR, with the exception of impacts on raptor foraging areas and short-term loss of

marginal nesting habitat for common migrant birds, the Proposed Project would not result in unavoidable adverse impacts on Biological Resources, including birds.

### **Comment 43-31**

There appear to be no adequate insect or invertebrates surveys for Phase 2 lands. While much of the area has been covered with rubble piles, important species may be surviving in Phase 2.

### **Response 43-31**

The wildlife surveys conducted on the Proposed Project site included surveys for insects and invertebrates, as can be seen from the species list provided in Table 3-3 in Appendix G-2 of the Draft EIR. In addition, results from previous surveys also were reviewed. These previous studies, which focused on insects and invertebrates, are included in the list of studies cited in Table 2-1 of Appendix G-2 of the Draft EIR. As discussed in Subsection 5.0, Section IV.D, Biotic Resources, on page 551 of the Draft EIR, with the exception of impacts on raptor foraging areas and short-term loss of marginal nesting habitat for common migrant birds, the Proposed Project would not result in unavoidable adverse impacts on Biological Resources, including insects and invertebrates. No significant impacts on biological resources would occur, after mitigation.

### **Comment 43-32**

Please explain and analyze what the impacts will be to the White-tailed Kite, one of California's most protected species. This bird just last year began nesting again at the Ballona Wetlands for the first time in more than 100 years since this species was nearly hunted to extinction in this bioregion. The Kite needs large amounts of foraging area, and no doubt the loss of foraging area in Phase 2 will impact this species. Please analyze to what extent this loss will be, combined with the loss of foraging area in Phase 1/DreamWorks campus site which has not yet been built on and the potential loss of upland grasslands for wetland restoration in lands now acquired by the State of California.

### **Response 43-32**

White-tailed Kite is a species of raptor. Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR on pages 547 and 552 states that the Urban Development Component of the Proposed Project would result in a net loss of foraging area for raptors, but is unlikely to affect their long-term survival *due to the restoration components of the Project and presence of more diverse foraging opportunities off-site in the nearby Ballona Wetlands*" (emphasis added). In considering potential impacts of loss of raptor foraging area, the probable size of the prey base and its capacity to support predators must be evaluated in addition to total acreage of land. The conclusion in the Draft EIR, quoted above, is based on an assumption that the increase in diversity of cover and native vegetation resulting from the Habitat Creation/Restoration

components of the Proposed Project will increase the abundance of rodents, snakes, lizards, and small birds that form the food base for raptors, including White-tailed Kite. In addition, the Habitat Creation/Restoration Component of the Proposed Project will provide both breeding habitat (riparian) and foraging habitat (restored coastal sage scrub, grassland) for raptors, which will add to the existing foraging and breeding habitat provided by the Ballona Wetlands.

### **Comment 43-33**

Island biogeography theory states that the larger the habitat preserved, the more species that inhabit that area. If this Phase 2 area were to be preserved as a natural park area, and Centinela Creek be allowed to be fully restored, not only to a small confined channel area, but to the largest extent possible, including adjacent prairie upland habitat area, where species like the Southwestern Willow Flycatcher and Least Bell's Vireo would forage (they catch insects in areas adjacent to the Willow thickets), then the habitat area would be greatly enhanced, as opposed to greatly diminished, as this draft EIR contemplates. Please explain which would be the environmentally superior alternative.

### **Response 43-33**

The theory of island biogeography, to which the commentor refers, was formally proposed by Robert MacArthur and E.O. Wilson in their 1967 book, "The Theory of Island Biogeography," published by Princeton University Press. This monograph was based largely on data from oceanic islands, and the authors cautioned that their hypotheses needed testing through further field study. However, their general correlation between size of geographic area and species diversity has become generally accepted in the scientific community. Contrary to the commentor's assertion that the Proposed Project would greatly diminish habitat area, implementation of the Habitat Creation/Restoration Component is estimated to result in a net increase in amount and quality of native habitat in comparison to existing conditions. This conclusion and its rationale are discussed on in Subsection 3.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 546. Section VII, Alternatives, of the Draft EIR evaluates impacts of alternatives that would reduce the size and density of the Urban Development Component. The alternatives analysis concludes that any of the alternatives which reduce the size and density of the Urban Development Component would be better than the Proposed Project, at least with respect to Biotic Resources.

### **Comment 43-34**

#### **6. NOISE:**

There is no mention in this section of the impacts of noise from the proposed project on the wildlife of the Ballona Wetlands or the riparian corridor. Please correct this deficiency.

**Response 43-34**

Potential noise impacts to wildlife of the Ballona Wetlands and the riparian corridor that may result due to buildout of the Proposed Project are discussed in Section IV.D, Biotic Resources, of the Draft EIR, starting on page 523. With the inclusion of mitigation measures, including planting native landscaping along Bluff Creek Drive to buffer traffic noise, potential Project noise impacts to wildlife would be reduced to less than significant levels.

**Comment 43-35****8. ARTIFICIAL LIGHT & GLARE:**

This section of the draft EIR ignores the fact that this area for many, many years was completely devoid of artificial lights. The addition of yet more lights to the adjacent protected wetlands in Areas C, B and A are not discussed adequately and need to be.

**Response 43-35**

The Draft EIR describes the setting conditions as they occurred at the time of the distribution of the NOP. The Proposed Project is located within Playa Vista Area D, and would not add new lighting in Areas C, B, or A. These areas are located approximately 0.5 mile, 0.75 mile, and 1.1 miles from the Proposed Project, respectively. Major roads adjacent to the Ballona Wetlands consist of Lincoln Boulevard, Jefferson Boulevard, and Culver Boulevard. Based on the traffic volumes projected in the traffic study for the Draft EIR for these roadways in the area adjacent to the Ballona Wetlands, the Proposed Project is anticipated to result in increased average daily trips (ADT) of 1.5 percent. Therefore, it is not anticipated that there would be significant light and glare impacts on those areas. Further, portions of the Project Site were previously used a part of the Hughes Aircraft plant and as a related runway.

**Comment 43-36**

It is not true that the entire area is surrounded by urban development. In fact, the cumulative impacts of lighting in Phase 1 development, immediately adjacent to and across the street from the wetlands, needs to be calculated and analyzed.

**Response 43-36**

As noted in Response 43-35, above, the Proposed Project is located within Area D. In addition to the distances between the Project and the areas cited in Response 43-35, above, it may be noted that the intervening lands include urban development, with the First Phase Project to the west and the east and a mix of land uses along Jefferson Boulevard on the north. Therefore, the Proposed Project would not contribute direct lighting to those areas. Any Project addition to cumulative lighting would only occur as a very small added increment to the ambient urban lighting that



already occurs and, therefore, is not significant. The impacts of the Proposed Project on habitat are addressed in Subsection 3.3.5 of Section IV.D, Biotic Resources, on page 545, and mitigation measures to reduce impacts are included in Subsection 4.0 on page 551.

### **Comment 43-37**

#### **9. LAND-USE:**

Please refer to the Island Biogeography theory, as outlined under “5. BIOTIC RESOURCES” above, and please apply this theory to the fragmentation of land-use designations. In other words, the larger the area preserved and dedicated to open space/natural park areas, the less the fragmentation of these land-use areas would occur.

### **Response 43-37**

Please refer to Response 43-33, above. Rather than consolidating numerous recreation activities into one large park space, the park system under development in the First Phase Project and proposed within the Proposed Project would distribute a network of smaller parks throughout the community. As such, the parks act as both physical organizing elements for the neighborhoods and provide a sense of place and identity for the residents living in the various neighborhoods. Consistent with the principle of encouraging pedestrian activity, the parks are distributed such that every residence is within a 5 minute walk of at least one park. The park system would accommodate a broad spectrum of recreation activities.

### **Comment 43-38**

#### **11. SAFETY/RISK OF UPSET:**

Please explain why an “annual update report of plant-site remediation” from March, 1990 (McLaren) is relevant to this draft environmental impact report and why a more recent “annual update report” is not available for analysis.

### **Response 43-38**

Between 1986 and 1990, McLaren Environmental Engineering conducted multiple investigation and remediation activities, some of which were performed in the Proposed Project site. Although only a small portion of the report is directly relevant, the March 1990 Annual Update Report on Plant Site Remediation (McLaren) was included in this Draft EIR because it provided an illustration of groundwater conditions in the Proposed Project area in late 1989 as well as in adjacent areas. Annual update reports for Site-wide (including the adjacent Playa Vista First Phase Project and Proposed Project sites) remediation activities were not published after 1990. As described in detail in Subsection 2.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR

starting on page 682, pursuant to Cleanup and Abatement Order (CAO) No. 98-125, subsequent assessment activities have been performed in phases and results from each phase of investigation are presented in the Draft EIR, and are included in Appendices J-3 and J-5 of the Draft EIR. Quarterly status reports are included in the Quarterly Groundwater Monitoring and Progress Reports in accordance with the CAO. A copy of the CAO is included the Regional Water Quality Control Board's Comment Letter on the Draft EIR (Comment No. 15), which is included in the Final EIR.

### **Comment 43-39**

Please explain how elevated levels of arsenic and lead in excess of the site-specific HBRDs [*sic*] for residential soil will be remediated and how it will be determined whether or not potential residents of the proposed Playa Vista Phase 2 development will be able to grow vegetable gardens or allow their children to play in yards where such a contaminant has been found. Please also explain further how the absence of lead in certain soil samples indicates that the presence in other samples

### **Response 43-39**

Metals contamination from past industrial operations that occurred at the Proposed Project site will be remediated using technologies, such as excavation and off-site disposal, described in Appendix J-2.

Surface soil at final grade at the Proposed Project site will be fill material. The fill materials for the Proposed Project may come from two on-site sources—native soils or fill imported to the site by prior land owners. These soils (whether native or imported) are subject to past and continuing investigation and remediation, if applicable, as described in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 666. Historical records of operations at the Hughes Aircraft Company and its successors, past field investigations of contamination at the site, and more recent sampling of soil at the site have been used to identify soils that could pose a threat to human health if left in place at grade. These soils will be remediated to achieve protection of worker, residents and people recreating in the Proposed Project site from unacceptable cancer risks or non-cancer health risks. In the event on-site soils from contaminated areas are proposed to be used for fill material, the actual use of such soils for fill would only occur after the necessary and appropriate remediation of contamination has been completed. Other native soils are expected to meet criteria for protection of human health and may also be used for purposes of achieving final grade.

Additionally, fill materials for the Proposed Project may be imported from off-site areas. The Applicant has implemented a soil import procedure for the Playa Vista site to evaluate imported soils.

This soil screening procedure was recently re-evaluated and found to also be protective for people that might grow their own vegetables within the Project area (see Camp Dresser &

McKee, Inc., Evaluation of Fill Screening Methods for Materials Imported to the Playa Vista Phase 1 Residential Area, Letter from J. LaVelle (CDM) to A. Siddiqui (RWQCB), February 28, 2003, which is provided in the Appendix of the Final EIR). Accordingly, fill materials used at the site to achieve final grade will meet quality criteria for the protection of human health. It is anticipated that the same import procedures used for the adjacent Playa Vista First Phase Project, as applicable, would be applied to the Proposed Project. Please see Section II.13, Corrections and Additions, of the Final EIR for a revision to the Draft EIR regarding the above comments.

#### **Comment 43-40**

### **12. POPULATION, HOUSING AND EMPLOYMENT:**

Wetlands Action Network objects to the use of SCAG assumptions for human population growth and asks the City of Los Angeles to consider whether or not the natural resources of this region are not already overtaxed and whether or not we have limits to the amount of human population growth this region can accommodate.

#### **Response 43-40**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. SCAG regional projections provide advisory information to various jurisdictions and public agencies (e.g. technical staff and decision-makers) to be used for land use planning and the provision of various community services. Under CEQA Guidelines, Section 15126.2, “[i]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” Physical changes to the environment that occur as a result of growth may be significant or less than significant. All of the Proposed Projects impacts have been analyzed with regard to their impacts on the physical environment, both individually and cumulatively.

#### **Comment 43-41**

The final EIR needs to include adequate cumulative impacts analyzed from population density and growth for Phase 2 combined with the nearby communities of Westchester, Marina del Rey, Playa del Rey, Mar Vista, Santa Monica, Culver City and Venice.

#### **Response 43-41**

The geographic areas identified in the comment are incorporated into the study area for assessing cumulative impacts as set forth in Subsection 6.0 of Section IV.J., Population, Housing and Employment, of the Draft EIR. The quantitative analysis requested in the comment is provided in Tables 111 and 112 on pages 794 and 795 of the Draft EIR and the text that supports these two tables.

**Comment 43-42****13. TRAFFIC AND CIRCULATION:**

Given the 24,220 daily trip ends contemplated in the draft EIR, what is the anticipated roadkill estimates for those trips that cause travel adjacent to the Ballona Wetlands?

**Response 43-42**

There are no statistics for estimated numbers of road kills under existing conditions, and no information that would enable estimation of road kill numbers with implementation of the Proposed Project. Major roads adjacent to the Ballona Wetlands consist of Lincoln Boulevard, Jefferson Boulevard, and Culver Boulevard. Based on the traffic volumes projected in the traffic study for the Draft EIR for these roadways in the area adjacent to the Ballona Wetlands, the Proposed Project is anticipated to result in increased average daily trips (ADT) of 1.5 percent. As a result, the Proposed Project is not anticipated to substantially contribute to “roadkill” adjacent to the Ballona Wetlands.

**Comment 43-43****22. WATER CONSUMPTION:**

Please explain how this project is in compliance with the law that was passed by the California legislature that requires a development of this size to specify exactly where the water supply for the project will originate. (Senator Sheila Kuehl was the author of the legislation.) There is no mention in the draft EIR of the specific source of the water supply that will provide water to this development, as required by law.

**Response 43-43**

The commentator mistakenly states that the Draft EIR fails to mention the specific water sources for the Proposed Project “in consideration of State Senator Sheila Kuehl’s bill.” The Water Supply Assessment (WSA) performed for the Draft EIR was completed in accordance with the requirements of California Water Code Section 10910 et. seq., as amended by SB 610 (Costa). SB 610 was enacted on the same day as SB 221, the bill authored by State Senator Sheila Kuehl, which is assumed to be referred to by the commentator. SB 221 does not impose any requirements during the EIR process, but rather requires that the approval of a development agreement or subdivision be conditioned on a written verification that sufficient water supplies exist for the Project. SB 221 provides that a water supply assessment, such as the one prepared for the Proposed Project by LADWP and contained in Appendix N-1b of the Draft EIR, may satisfy the written verification requirement. Government Code section 66473.7(c)(2). The WSA prepared by LADWP includes the descriptions of water sources required by SB 610 and the Water Code.

**Comment 43-44****25. VISUAL QUALITIES (Aesthetics and views):**

Probably the most frequent comment we hear from people who talk with us about the Playa Vista Phase 1 development is how unsightly it is, how it “looks like a prison,” how the person had “no idea it would end up looking so bad”—in essence that it is not aesthetically pleasing. Please indicate how the developers might have learned from this unfortunate experience and how improvements might be made in Phase 2.

**Response 43-44**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 43-45**

Please also explain how views from Lincoln Blvd., Centinela, or other streets originating in Santa Monica, while one is traveling toward the airport will be significantly impacted, as the last view of the Loyola bluff will no longer be visible.

**Response 43-45**

Views for travelers to LAX from the City of Santa Monica could be affected, but such effects would be limited. The Proposed Project would not place development in front of Centinela Avenue, or towards the eastern side of Centinela Avenue. As travelers approach the Proposed Project site on Centinela Avenue, views of the Bluffs would remain along a view corridor toward the bluffs. Development would limit some sights toward the west of Centinela Avenue from limited locations depending on elevation and viewing opportunities. The Proposed Project site is located approximately .75 miles east of Lincoln Boulevard, out of the direct line of view for Lincoln Boulevard travelers, and mostly hidden from that route by existing development. Only brief intermittent glimpses of the portion of the bluffs lying behind the Proposed Project are apparent. The view along Lincoln Boulevard in the Project vicinity includes First Phase development east of Lincoln Boulevard and the Playa del Rey bluffs with adjacent open space on the west side. The views of the bluffs west of Lincoln Boulevard (bluffs which lie straight ahead of the viewer due to a jag in the road) would not be affected by the Proposed Project. Views of the bluffs in the Proposed Project area are not available from other major north-south routes. Views from some limited, more distant routes at higher elevations at crest locations would be able to see Project development along the lower portion of the bluffs with the upper portions still apparent. To the extent that travelers might use Jefferson Boulevard to cross from one north-south roadway to another, the impacts of travel along Jefferson Boulevard, in the vicinity of the Proposed Project site, are addressed in Subsection 3.4.2.4 of Section IV.O, Visual Qualities (Aesthetics and Views), of the Draft EIR on page 1179. As indicated, impacts along Jefferson

Boulevard in the vicinity of the Proposed Project, would be significant. The cumulative impacts of the Proposed Project and the First Phase Project are discussed in Subsection 6.0 of Section IV.O, Visual Qualities (Aesthetics and Views). As noted on page 1185: “The most notable view impact from the Playa Vista First Phase Project is a reduction in views of the bluffs for travelers along Jefferson Boulevard and Lincoln Boulevard. This impact would contribute to the obstruction of a view resource, which was considered significant for the Proposed Project alone, and would be cumulatively significant as well.”

#### **Comment 43-46**

#### **ADDITIONAL COMMENTS:**

Finally, please explain why the proposed Phase 2 development is being considered prior to the Phase 1 development even being half-way completed or filled. What is the need for this development, given the glut of “for lease,” “for rent” and “for sale” signs on residential developments in the region, as well as the obvious and well-documented overabundance of commercial space in the airport/marina area? Would it not be better for the westside quality of life, as well as for the adjacent wetlands ecosystem, to work toward making the developer a financial offer (there are plenty of state park bond moneys still available) that would encourage the emergence of a willing seller, not only of Phase 2 lands, but also of all undeveloped land remaining in Area D?

#### **Response 43-46**

There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project. This comment raises issues that are not environmental issues pertaining impacts of the Proposed Project.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

#### **Comment 43-47**

State halts development where water is inadequate

The Arizona Republic  
Dec. 20, 2003 12:00 AM

Laura Dobbins

For the first time in Arizona, state laws designed to ensure water supplies and stop land fraud are bringing development to a halt.

State officials recently notified three private water providers in Fountain Hills, Apache Junction and northeast Pinal County that they do not appear to have a required 100-year assured water supply to serve new housing and other construction. Four municipal water departments in rural Arizona also are on notice.

The notices from the Arizona Department of Water Resources prevent the sale of new homes or commercial developments on subdivisions not yet recorded with a county.

In Fountain Hills, the notification has halted nearly a dozen developments.

Fountain Hills resident and land preservation advocate Jim Hamblin isn't surprised.

"We suffer from drought denial in the Valley of the Sun. For years, water has been 'apparently' plentiful and definitely cheap," Hamblin said. "Fountain Hills' water issues remind us that we may need to change our thinking ... and our habits."

And the same could happen in the other areas that received the notices. One of the largest areas that may be affected is the proposed Johnson Ranch, a master-planned community of 67,000 homes in northeast Pinal County.

In addition, four municipal water providers serving Prescott, Nogales, Florence and Eloy were notified this month, though infractions in Prescott and Nogales may be fixed with updated paperwork. Florence and Eloy are still under scrutiny, state water officials said.

"In the past, companies have gotten close to their allotted levels but seldom have gone over their assured supply," said Doug Dunham, manager of the state Department of Water Resources' Office of Assured and Adequate Water Supply.

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(In accordance with Title 17 U.S.C. Section 107, this material is distributed without profit to those who have expressed a prior interest in receiving the included information for research and educational purposes.)

~~~~~

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 Executive Director  
 Wetlands Action Network  
 protecting & restoring wetlands  
 along the Pacific Migratory Pathways  
 PO Box 1145  
 Malibu, CA 90265  
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### **Response 43-47**

The comment provides background information on the letter submittal. Specific comments regarding these concerns are addressed in Response 43-43, above.

### **Comment 43-48**

Sierra Club Ballona Wetlands Task Force

A subcommittee of the Conservation Committee of the Angeles Chapter of the Sierra Club

Agenda

December 22, 2003

Ken Edwards Center, Santa Monica

Chair, Robert Roy van de Hoek

1. Self-introductions
  2. Announcements
  3. Treasurer's Report—Susan Suntime, Treasurer
  4. Report by Legal & Strategy Officer, Marcia Hanscom
- Phase 2 Environmental Impact Report &  
Land Conveyance Progress
5. Guest Speaker, Joan Hartmann, Southern California Wetlands Recovery Project
  6. Questions & Answers for Guest Speaker
  7. Member Comments about Restoration efforts they would like to see at Ballona
  8. Report on Mediation & Elections by Robert van de Hoek, Chair
  9. Brief presentation on history of Ballona—Rex Frankel
  10. Adjourn

**HAPPY HOLIDAYS!!!**



**Response 43-48**

The attachment provides a December 22, 2003, meeting agenda. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 44**

Ade Adeniji  
13445 Beach Avenue  
Marina del Rey, CA 90292

**Comment 44-1**

I am writing to express my support for the approval of the Village at Playa Vista. Our city desperately needs to foster communities in which residents can live and access retail and services within the same area. Playa Vista has proven that it is committed to providing its residents with beautiful, efficient and environmentally friendly living spaces, and will continue to pursue the same policy in its next phase--the Village.

One of the attractive elements of becoming part of the Playa Vista community was the expectation that restaurants, retail shopping and grocery and other service outlets would be available within a short distance. It is my hope that the City will approve the Village, and complete this model project.

**Response 44-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 45**

Tina Aldatz  
President  
Foot Petals LLC  
6133 Bristol Parkway, #250  
Culver City, CA 90230  
866.TIP.TOES  
www.footpetals.com

Tenant at  
13163 Fountain Park Drive, #B326  
Playa Vista , CA 90094  
(310) 745-0515  
(310) 338-9780 office

**Comment 45-1**

Short of extending the city's costly lightrail system to the Westside, adding new public transit options on the Westside is the best way to get people out of their cars. Public transit works extraordinarily well in other parts of the country and can work well here too with the approval of The Village at Playa Vista.

The shuttle system at Playa Vista will take hundreds of cars off the road and will likely inspire other developers to include public transit as a meaningful option in future projects throughout the city.

Unique to the Playa Vista system is a GPS locator that will be placed on each shuttle, allowing Playa Vista residents to monitor the location of each shuttle on the community's intranet. That will reduce waiting times and provide for an incredibly efficient system that will meet demand in the best way possible.

We must provide residents with alternatives to traditional automobile transportation, and the Village at Playa Vista will do just that.

**Response 45-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 46**

Juan Alvarado  
948 S. Inglewood Avenue, #18  
Inglewood, CA 90301

**Comment 46-1**

I recommend that any person who wants to state an opinion about Playa Vista first take a walk through the community. It's nothing like the opponents say, and it's actually a wonderful and smart design that promotes "community" and instills a sense of safety, security and common sense.

There are parks, a library, a variety of home styles and a community center. There is abundant open space, and a clear sensitivity to the needs of nature. The freshwater marsh is in full bloom and is attracting all types of birds. And the riparian corridor, which is now a jumble of weeds, concrete and an ugly ditch, will become an extension of the marsh.

I'm also impressed that Playa Vista sees itself as a neighbor. I've been invited to free concerts, grand opening events and tours of model homes. The parks are available to everyone, and I know non-Playa residents who take their dogs to the off-leash park that has become quite a popular spot in the community.

In this time of New Year, I propose a toast to what Playa Vista has become, and what it can be in years ahead. The Village is an important piece of that puzzle, and I support it. And I support it having walked the streets, parks and freshwater marsh trails in the first phase of the property. You can only understand this place by walking it and experiencing what it has to offer.

**Response 46-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 47**

Tammy Andrews  
Resident of Playa del Rey  
8102 ½ Pershing Drive  
Playa del Rey, CA 90293

**Comment 47-1**

I am writing to demand a thorough study of all street effected [*sic*] by the Playa Vista project.

**Response 47-1**

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15 of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

**Comment 47-2**

Playa Vista and Councilwoman Ruth Galanter promised Phase 1 would be finished before any request for approval of Phase 2. What's the rush?

**Response 47-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project.

**Comment 47-3**

Do any of you people live around here? If you do, are you blind to the negative impacts already evident in our community?

In addition to the negative impact on the environment, the beauty of this area (the Playa Vista construction has absolutely “no curb appeal) and the lack of respect demonstrated towards the Indians who are indigenous to this area,

**Response 47-3**

Potential impacts to archaeological resources, including impacts on Native American burials, associated with the Proposed Project are addressed in Section IV.P.(2), Archaeological Resources, of the Draft EIR, beginning on page 1199. The Draft EIR identifies and discusses the potential impacts on CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769 and concludes, on page 1224, that implementation of the Programmatic Agreement and mitigation measures listed therein would reduce impacts on archaeological resources to a less-than-significant level. The impacts on archaeological resources have been further commented on and responded to in a letter from the Native American Heritage Commission. Please refer to Letter 14.

The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, and a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 47-4**

I am extremely concerned about traffic impacts of the buildout of Phase 1 of Playa Vista, and am especially wary of Phase 2.

Please don't let Playa Vista compromise our neighborhoods any more than is [*sic*] already has!

**Response 47-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 48**

Mike Arias  
8313 Chase Avenue  
Los Angeles, CA 90045

**Comment 48-1**

Playa Vista incorporates smart-growth principles, conservation and a commitment to sustainable development. Its master plan has been completely rethought and redesigned, significantly reducing the size, scope and impacts to the surrounding community and the environment.

The smaller, greener plan for Playa Vista sets aside more than 70% of its acreage for parks and open space, committing all land west of Lincoln Boulevard and north of the Ballona Channel to be preserved as open space. This is simply incredible.

Importantly, The Village builds on Playa Vista's commitment to protect plants and wildlife, air and water. We've already seen the results of much of their environmental work in Phase I, and the standards they use are the best. In the Village, Playa Vista will add 23 acres of new parks and habitat to an area in desperate need of these resources, and will help complete the innovative freshwater marsh system by completing the final acres of a riparian corridor.

What's not to like? The Village is the logical extension of a sustainable development that was recently dubbed "LA's Urban Model" by the Los Angeles Times. It is deserving of the City's prompt approval.

**Response 48-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 49**

Gayle Avant  
948 South Inglewood Avenue, #19  
Inglewood, CA 90301

**Comment 49-1**

A lot has been said, often inaccurately, about methane at Playa Vista. The fact is, Playa Vista has instituted one of the most rigorous methane monitoring and prevention programs in the history of the City of Los Angeles. L.A. homeowners in areas with methane deposits do not have such protections.

The methane issue is just a distraction tactic used by fringe activists who are trying to impede Los Angeles' progress. Do not let their unfounded noise derail The Village at Playa Vista. It is a smart, safe project.

**Response 49-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 50**

Terry Ballentine  
3008 Ocean Avenue  
Venice, CA 90291

**Comment 50-1**

I am writing to you because I am concerned with the increased traffic caused by Playa Vista Phase 1. Before Phase 2 is approved, I urge you to take a close look at the effectsd [sic] of this huge development has on the quality of life in the area. Traffic mitigations are dubious at best and non-existent for many of the “spill over” residential streets. Even now, before we feel the full effects of Phase 1, people are avoiding existing gridlock by driving through residential areas. This will get much worse, if we support additional construction in our Ballona Wetlands.

**Response 50-1**

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.

The Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed therein, a total of four neighborhoods were identified as having potential significant neighborhood traffic impacts as a result of the Proposed Project, and would be eligible to participate in the neighborhood traffic mitigation program identified in the mitigation program.

It should be noted that the Proposed Project does not propose any construction in the Ballona Wetlands.

**Comment 50-2**

58% of the places where Phase 2 traffic will cause a significant impact, Playa Vista has said it can remove the impact by increasing bus seats. Considering the socio-economic level of people paying \$800,000 and above for these homes, we don't think so! These people will NOT be riding busses. They will be driving their 2 cars per household in and out of the area.

For 38% of the significant impacts, Playa Vista is only required to (contribute to the design and implementation of...). There is no time certain requirement for this mitigation. It could be years from now or never.

**Response 50-2**

The proposed transit enhancement mitigation measures are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of other transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the proposed mitigation would be effective to reduce potentially significant impacts to less than significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections. Please refer to Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, for a more detailed discussion.

At locations where the mitigation program calls for the Proposed Project to contribute to the design and implementation of the measure, the contribution is expected to ensure that these improvements will be implemented. All of the proposed signal system improvements are currently scheduled to be implemented.

**LETTER NO. 51**

Diane Barretti  
4160 Admiralty Way, Suite 3F  
Marina del Rey, CA 90292

**Comment 51-1**

By supporting The Village at Playa Vista, the City of Los Angeles can signal to developers around the country that urban infill is the smartest way to deal with the intense demand for housing.

The Village will help complete a community that needs services and amenities to achieve its innovative vision for new urban living. Mixing housing, retail, commercial and open space it optimizes the land at Playa Vista. It turns an eyesore into a productive neighborhood.

Years from now, when Playa Vista has matured, we will see how truly visionary Los Angeles was in approving it. Don't let this opportunity slip away.

**Response 51-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 52**

Robert E. Bates  
13075 Pacific Promenade, #106  
Playa Vista, CA 90094

**Comment 52-1**

I feel like a pioneer. As one of the first residents of Playa Vista, I am helping to shape a community that I know will one day be held up as a model for urban living. The homes are beautiful, spacious, and hi-tech. The parks are great places to play and meet neighbors. In short, Playa Vista is the community I have never been able to find in all my years of living in Southern California.

The critics of Playa Vista say this new community is making Westside traffic a nightmare, but as a homeowner at Playa Vista, let me tell you different. Like a lot of my neighbors, I have been living on the Westside for a long time. I didn't come from someplace else. Living at Playa Vista now, my commute is shorter and I can avoid the 405 freeway. This has been a great change in my life, and I know I am not the only one at Playa Vista who is making the region's traffic situation better, not worse.

The transportation plan for The Village continues to improve roads that have been neglected for too long. From automating signals to plugging potholes and expanding bus service, Playa Vista's traffic measures are effective and welcome.

Those of us who live at Playa Vista are very excited about The Village and hope the City of Los Angeles approves the project.

**Response 52-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 53**

Michael R. Bauer  
10676 Esterina Way  
Culver City, CA 90230

**Comment 53-1**

It is vital to this entire project that the Village move forward as quickly as possible. This means new jobs, which we all know is vital these days, more housing on the housing-poor Westside and new parks as part of a plan that is much smaller than what was previously proposed.

It seems that this project is being thwarted by those that put barricades in any development for no other reason than they don't want anything built anywhere at any time.

The second phase of Playa Vista is being built on the old Hughes Aircraft site and will be a benefit to everyone who lives in the area. I hope you will help move this project forward as quickly and smoothly as possible.

Thank you very much for your Response to this request.

**Response 53-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 54**

Carol V. Beck  
1053 Elkgrove Avenue, #1  
Venice, CA 90291-5721

**Comment 54-1**

I am writing to notify your department of my considered objections to the Playa Vista Phase II Draft Eir as follows:

- 1) traffic is already at gridlock
- 2) inadequate, unproven methane “mitigation” measures,
- 3) vile and vulgar desecration of Native American “Sacred Sites”; burial grounds thousands of years old laid waste, with human remains put in buckets!
- 4) inadequate provision for liquifaction zone, gas seeps, toxic fumes
- 5) rapaciously inadequate provision for the safety and well-being of the citizens of Los Angeles, CA., as well as liability therefor [*sic*].
- 6) destruction of the coastal bluffs in an illegal manner
- 7) rampant destruction of wildlife habitat

**Response 54-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of methane in Section IV.I, Safety/Risk of Upset on page 660, a detailed analysis of archaeological resources in Section IV.P.(2), Archaeological Resources on page 1199, and a detailed analysis of biological resources in Section IV.D, Biotic Resources on page 523. As indicated in the various analyses net impacts after mitigation would be less than significant for Safety/Risk of Upset, Archaeological Resources and Biotic Resources. See also Section II.13, II.29, and II.7, Corrections and Additions, respectively, of the Final EIR. A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis

is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

**LETTER NO. 55**

Dr. Suzanne De Benedittis  
5800A Hannum Avenue, Suite 219  
Culver City, CA 90230

**Comment 55-1**

As a Mar Vista property owner, and resident of Culver City, I am writing to request that as City Planner, you will make the recommendation to the Los Angeles City Council not to accept this proposal until:

- (1) Los Angeles has light rail in place to effectively mitigate traffic as their proposal even with its mitigations will still have major thoroughfares and freeways in the area gridlocked.
- (2) There are a sufficient number of hybrid and hydrogen fuel cell cars in use to allow their air quality to reach acceptable standards. For even with their use of efficient vehicles and with computerized traffic signals to allow buses quicker passage, Playa Vista as proposed will put over 2 million pounds of toxins a year into our already polluted air.
- (3) Or Playa Capital can scale this project down further than what it has done from its original conception so that it respects these needs.

For I am sure you realize that Los Angeles streets and freeways cannot sustain both the expansion of LAX and such a high density development so close by. And if you travel in the area in the mornings or from 3:30 to 7:00 pm, you can see for yourself that even with the mitigations in place for Phase 1, the gridlock persists and keeps growing!

When I met you at a hearing a while back, I was impressed by your integrity and honesty. I trust your report will reflect your character.

Thank you in advance for all you are doing in planning for the City to meet the needs of all of us. I am sure the regional housing needs can be better met elsewhere, especially since only about 10 to 15% of Playa Vista will be "affordable." (How many of the working class will be able to afford homes in the upper \$200,000.00 range?) And so we will still have all the commuting to and from Playa Vista of those in the service sector.

Thus, the very concept on which Playa Capital is selling its project, from my reading of the EIR, cannot be met and becomes the source of adverse impacts for all of us to suffer.

Thank you for respecting the fact that our lives, our lungs, respiratory and nervous systems will be irreparably damaged if we accept this project as it is currently proposed. Thank you for your integrity in presenting to the City Council and to Playa Capital that they have to do better, and



that even though they are seeking to provide housing, they still have to meet all of the air quality standards, not just one of the five. (See Table 15 on page 306 of the EIR.)

Playa Capital is not above the law. Or are they? They need to obey the environmental laws just as any other business or development needs to, especially since their project is of such a magnitude and will have such long range, lasting detrimental effects on all of us. Or else why do we have laws?

Do you believe there is such a shortage of housing that most of our citizens would be willing to compromise their lungs, nerves and respiratory system in order to accommodate those living at Playa Vista--to accommodate those who will have the ocean breezes to clear their air as it blows over the rest of us, taxing us with over five thousand pounds of poison a day? Is this democracy? Would it not best serve the public, all those who pay taxes to Los Angeles, to have a referendum asking if they desire such housing?

For if my calculations are correct, in just one year we would have over 2 million pounds of poison to breathe even with all of the proposed mitigations from Phases 1 and 2. How many pounds of these inhaled poisons do you think it takes to incapacitate your respiratory system? Or mine?

Thank you for respecting these facts and understanding that it is the environmental impact we are assessing at this time--not other conditions or developers' vested interests that too often muddle the focus which is the impacts on our overly taxed environment and its effects for all of us citizens and stakeholders in Los Angeles.

### **Response 55-1**

Please note that Section IV.B, Air Quality, of the Draft EIR analyzed the impacts related to regional mobile source emissions and Table 15 on page 306 of Section IV.B, Air Quality, of the Draft EIR has an estimate of emissions resulting from the Proposed Project. Section IV.J, Population, Housing and Employment, of the Draft EIR analyzed the impacts of the Proposed Project on housing. Section IV.K.(1), Traffic and Circulation, of the Draft EIR analyzed the impacts of the Proposed Project on traffic.

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 56**

William E. A. Berger  
12052 Braddock Drive  
Culver City, CA 90230

**Comment 56-1**

I'm very concern about the lack of a bicycle path connection between Playa Vista and Ballona Creek bike path. The limited area for biking in Playa Vista could be greatly extended for those living there if there were a connection to Ballona bike path so that one could get to the ocean/beach or other parts of Los Angeles. Also there is no safe way for me or anyone to get to the Library at Playa Vista from the Ballona bike path. The bridge on Lincoln Blvd would be suicide unless it could be widened for bikes and perhaps for pedestrians.

It would be a such a waste of facilities not to make these connections which would mean healthier lives for those using bikes and less pollution [sic] and less car congestion.

Hopefully this idea/suggestion will be considered seriously.

**Response 56-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

Pursuant to State CEQA Guidelines, the Draft EIR analyzes the impacts of the Proposed Project and where necessary proposes mitigation measures to address the Project's impacts. As indicated in Subsection 3.4.1, Proposed Project Impacts, of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 961, the Project's Class II lanes would link with other bikeways, would be compatible with adjacent Playa Vista First Phase Project bikeways and provide enhanced service for the Proposed Project's population, Playa Vista First Phase Project's population and regional travelers passing through the site on their longer journeys. The new bikeways would improve the quality of bikeway service. Thus, the Proposed Project would not interfere with the implementation of any planned bikeways, but would expand upon and complement existing Bike Plans. Other bikeway improvements would not be required to mitigate significant impact identified in the Draft EIR. The Draft EIR does provide information on the regional system, as illustrated in Section IV.K.(3), Bicycle Plan, of the Draft EIR in Figure 82 on page 957.

**LETTER NO. 57**

Karen & Mark Binder  
5801 South Kiyot Way, #11  
Playa Vista, CA 90094-2139

**Comment 57-1**

Please don't take away our chance to have new stores and restaurants and, best of all, a local market at Playa Vista.

The Village will provide all of these things to our neighborhood, and we desperately want these things so that we can walk to the market or grab a cup of coffee without getting into our cars.

I think of the wonderful city neighborhoods in other parts of the country where people walk to work, walk to get their morning newspaper and pass each other on the sidewalks instead of on the freeway. Playa Vista has the chance to be one of those neighborhoods. Please support The Village and make our neighborhood the best it can be.

**Response 57-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 58**

Juliet Bobak  
7751 Henefer Avenue  
Westchester, CA 90045

**Comment 58-1**

My name is Juliet Bobak, and I am a resident of Westchester. I strongly support the Village at Playa Vista. Our City will continue to grow in population, and this new, carefully designed development is crucial to the Westside.

In the past, the City of Los Angeles has done a very poor job in planning park space for its new communities, which makes this city inexcusably short on open space. We have very few parks on the Westside and even fewer that are properly maintained. It is extremely important that each new community develop as much park space as possible.

Simply building a large grassy area does not always meet a community's needs. This is another reason why I am happy to support The Village at Playa Vista. Playa Vista has proven that by giving each of its parks a special identity, the needs and desires of everyone in the community can be addressed.

Playa Vista already has parks especially designed for dogs off-leash, for people to play Frisbee and other games that require large open areas, and for outdoor concerts. Plans include additional space for soccer fields and other recreational activities.

The Village plan will include five additional parks, and I am excited to see what ideas are in store for these. Parks for handicapped children or even fitness parks for senior citizens could be created. Areas that can be used as outdoor classrooms or meeting spaces would benefit neighboring communities as well.

I am impressed by the success and planning that has gone into Playa Vista's current park space, and I know that the Village will have even more innovative ideas for park space which my family and I look forward to seeing.

**Response 58-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 59**

Scott Bouton  
2806 Emerson Avenue  
Los Angeles, CA 90045

**Comment 59-1**

At a recent community presentation, Doug Moreland of Playa Vista said that one of the goals of The Village is to bring in neighborhood-serving stores that principally serve the people who live and work at Playa Vista and the neighborhoods directly adjacent. The Playa Vista people expect those stores to include local restaurants, a bank branch, a shoe repair shop, a grocery store, a pharmacy and other kinds of retail stores that provide neighborhood services.

This is exactly the right approach. As a local homeowner, I don't want Playa Vista residents coming up the hill in their cars and crowding the roadways on their way to the dry cleaners or to the local Starbucks. Those services should be made available inside the community within walking distance to their homes.

On the other hand, our area could use some more restaurants. I look forward to going to The Village for a meal, and taking a stroll along the riparian corridor after dinner. I might even ride my bike along one of the new bike trails envisioned for The Village and live the Playa Vista lifestyle even if I'm not a homeowner there.

**Response 59-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 60**

Terry Braverman  
Terry Braverman & Company  
Post Office Box 11571  
Marina del Rey, CA 90295-7571

**Comment 60-1**

Before we have even absorbed the full effects of phase one of the Playa Vista project, it appears that narrow self-interests are attempting to steamroll phase two through political channels.

As a local resident, I request that a thorough environmental study be made, including the impact of increased traffic and the potential of a methane gas explosion from underground. I feel this project seriously compromises the quality of life for the overwhelming majority of residents, to the benefit of a few powerful money interests, and must be curtailed.

**Response 60-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, and a detailed analysis of methane in Section IV.I, Safety/Risk of Upset on page 660.

**LETTER NO. 61**

Jane Bright  
13151 Fountain Park Drive, #C134  
Playa Vista, CA 90094

**Comment 61-1**

I was watching CNN recently and saw a teaser for a story about the home of the future. Having recently bought a new home at Playa Vista, I stayed tuned and was surprised when the story was about my neighborhood!

From energy efficient appliances to high-tech security and convenience features, the CNN story talked about all the things that are available at Playa Vista, and I realized that I am now truly living in the home of the future.

This is the kind of forward-looking project that Los Angeles should embrace with open arms. I mean, this is a place where pizzas will be delivered by electric vehicles!

We need more Playa Vistas if we hope to handle the population growth that is heading toward us like a runaway train, and I hope that The Village will be approved. Encouraging developers to build high-quality projects that incorporate energy efficiency and sustainable design is vital, and we should start right here with Playa Vista.

**Response 61-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 62**

Clara Broderick  
116 Sunridge Street  
Playa del Rey, CA 90293

12.21.2003

**Comment 62-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 62-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.



**LETTER NO. 63**

Dennis M. Bryan  
Ines R. Bryan  
6757 Altamor Drive  
Los Angeles, CA 90045

**Comment 63-1**

We are residents of the Westchester Bluffs. After a review of the EIR, we consider the following items to be insufficiently addressed in the EIR draft:

- Noise Pollution
- Air Pollution
- Ecological Changes
- Crime

**Response 63-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Specific comments regarding the review of the Draft EIR and responses follow.

**Comment 63-2**

Noise Pollution, Air Pollution

The construction of Bluff Creek Drive, as planned, will result in a significant increase of noise and air pollution for Westchester Bluff residents. While the draft calls for the construction of a four lane secondary highway (two lanes each way), Playa Vista's "The Village" publication calls for a four to six lane road. Bluff Creek Drive would thus attract high speed traffic with noise and air pollution to follow. Playa Vista does not have any proposals, as for example, trees lining the street and surrounding areas, sound barrier construction and planting shrubbery and/or foliage to hide the barrier. We believe Playa Vista should address how to mitigate pollution and how to beautify a large road as planned.

**Response 63-2**

With regard to air quality, an in depth analysis of potential localized construction and operational impacts related to the Proposed Project is provided in Subsection 3.4.1.2 (Local Construction Impacts) and Subsection 3.4.2.3 (Operational Local Impacts) of Section IV.B, Air Quality, in the Draft EIR. These analyses evaluated conditions atop the Westchester Bluffs as well as a number of other locations in the areas surrounding the Project site. As concluded in these subsections of

the Draft EIR, no localized significant impacts (e.g., no exceedance of any health based standard) would occur as a result of the Proposed Project.

Operational impacts attributable to travel along Bluff Creek Drive (i.e., the proposed 6 lane road referenced in the Comment), are analyzed in terms of carbon monoxide (CO) concentrations per SCAQMD procedures and practices. The SCAQMD recommends analyzing CO in cases such as the Proposed Project as CO is the largest single constituent and is considered to be the best indicator to assess changes in pollutant concentrations attributable to mobile-source emissions. Furthermore, it is the only pollutant from mobile sources for which standardized modeling methodologies for estimating localized concentrations have been developed and approved by the SCAQMD.

The intersection of Bluff Creek Drive and Lincoln Boulevard was analyzed as it is the location with the highest potential to yield a CO hotspot along Bluff Creek Drive since it is the location with the highest Project traffic and level of traffic congestion. All other locations along Bluff Creek Drive are anticipated to yield CO concentrations that are lower than the Bluff Creek Drive and Lincoln Boulevard intersection due to relatively reduced traffic volumes and traffic congestion. CO concentrations at this, as well as all other analysis locations were analyzed relative to national and state ambient air quality standards.

Consistent with SCAQMD's CO modeling protocol, all four corners of the intersection were modeled using a receptor distance of three meters for the one-hour analysis and seven meters for the eight-hour analysis. As shown in Tables 17 through 20 of Section IV.B, Air Quality, of the Draft EIR, no significant impacts would occur at the intersection with the highest traffic volumes and worst level of service along Bluff Creek Drive (i.e., the intersection of Bluff Creek Drive and Lincoln Boulevard). As CO concentrations are lower when traffic volumes and congestion are reduced, no significant impacts would be anticipated to occur at any other locations along Bluff Creek Drive as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersection. Consequently, the residents living along the Bluffs overlooking Bluff Creek Drive would not be significantly affected by CO emissions generated by the net increase in traffic which would occur under the Proposed Project. As the Proposed Project or cumulative traffic does not cause localized air quality impacts related to mobile sources, emissions were therefore concluded to be less than significant for the Proposed Project.

With regard to noise levels, composite roadway noise impacts for locations atop the Westchester Bluffs was analyzed in the Draft EIR. Specifically, Section IV.E, Noise, of the Draft EIR in Table 77 on page 577 and Appendix H (Noise) of the Draft EIR provide the analysis of potential Project impacts. As detailed therein, worst-case roadway noise impacts attributable to the Proposed Project (that includes traffic volumes along Bluff Creek Drive) would be 0.3 up to 1.9 dBA, CNEL. As stated in Section IV.E, Noise, of the Draft EIR on page 553, "changes in a community noise level of less than 3 dba are not typically noticed by the human ear."

Therefore, as discussed in Subsection 3.4.2.1.2 of Section IV.E, Noise, of the Draft EIR, the increases in traffic noise would not exceed the thresholds of significance and are not considered significant.

Subsection 2.1.1.2.2.4 of Section II.B, Project Characteristics, on page 162, describes the landscaping plan for the Project including tree-planting guidelines for the Project roadways and a landscaping transition between the native landscaping of the riparian corridor adjacent to Bluff Creek Drive and the plant species in the urban neighborhoods north of Bluff Creek Drive. Subsection 2.2 on page 167 describes the Project's Habitat Creation/Restoration Component that lies adjacent to Bluff Creek Drive, contributing to the aesthetic quality of the roadway. Subsection 4.0, Mitigation Measures, of Section IV.D, Biotic Resources, on page 551, includes the following mitigation measure: "Landscaping along Bluff Creek Drive shall incorporate native plant materials that will buffer traffic noise and help reduce noise levels within the Riparian Corridor."

### **Comment 63-3**

#### **Ecological Changes**

The construction of Playa Vista's "Village" would invade the Westchester Bluffs ecosystem. Currently, we witness foxes, hawks, and an abundance of small birds, wild geese, and other wildlife from our back yard. The construction would push out these native habitats.

### **Response 63-3**

The Draft EIR addresses potential impacts on Biotic Resources, including wildlife, in Section IV.D, Biotic Resources, beginning on page 523. As discussed in Subsection 5.0 of Section IV.D, Biotic Resources on page 551 of the Draft EIR, with the exception of impacts on raptor foraging area and short-term loss of marginal nesting habitat for common migrant birds, the Proposed Project, with implementation of the proposed mitigation measures, would not result in unavoidable adverse impacts on biological resources. The Habitat Creation/Restoration Component of the Project would result in a net gain of 10.2 acres of native habitat, a beneficial impact.

Additionally, a mitigation measure is included in Section IV.A, Earth, on page 267 of the Draft EIR, to require a rodent control program to prevent the migration of rodents or pests to neighboring properties.

### **Comment 63-4**

#### **Crime**

With the increase in traffic and population, the Los Angeles Police Department, which at this point only has one patrol car in the Westchester region, will be stretched beyond their resources. Considering the city of Los Angeles' tenuous financial situation, we feel that additional housing and commercial sites will not be adequately patrolled. Furthermore, our Westchester community will experience even less police presence. Playa Vista has not addressed the patrolling of the area.

**Response 63-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

The Draft EIR analyzes impacts on Police services in Section IV.L.(2), Police Protection, beginning on page 985. As stated on page 990 of this section, the population would generate the need for eight new officers. Also stated on page 990 of the Draft EIR, “[t]he Proposed Project would generate revenues to the City which could be applied toward the provision of new police facilities, with related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the decision-makers. Since it cannot be guaranteed that the Proposed Project’s revenue contributions would be applied to police services, it is conservatively concluded on page 994 of the Draft EIR that the Proposed Project’s demand may result in a substantial reduction in the service ratio, and impacts prior to and after mitigation could potentially be significant.”

**Comment 63-5**

We strongly feel that Playa Vista needs to have positive and specific plans available on how to deal with the points stated above before construction is approved and permitted. Please review our concerns and forward the City of Los Angeles’ response to us. We are truly concerned for our neighborhood and community.

**Response 63-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 64**

Bruce and Barbara Burns  
7314 Kentwood Avenue  
Westchester, CA 90045-1224

**Comment 64-1**

Please vote against this continuing development of Playa Vista.

**Response 64-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 64-2**

The city could face huge liability if there should be explosions from the underground gases. The developers have cleverly passed on their responsibility to the home builders and the home owners, and, ultimately, to the City of Los Angeles.

**Response 64-2**

Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 660, addresses in detail safety at Playa Vista. The commentor's concern regarding the City's liability is not an environmental issue.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 64-3**

Instead of the village with open space which the developers promised, they have desecrated the community with a monstrosity that will be an eyesore for years to come.

The streets and freeways in the community are at gridlock stage already. More development will bring in more traffic.

To permit the development to continue would not be in the best interests of anyone except the absentee bankers who own Playa Vista.

We beg you to oppose Playa Vista Phase II.

**Response 64-3**

The Draft EIR addresses the Project's impacts on Visual Qualities and Traffic and Circulation in Sections IV.O and IV.K.(1), respectively. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 64-4**

In addition to the city's liability if the underground gases explode, and the other negative consequences from this development mentioned in that e-mail, there is an additional point.

In a large percent of the places where Phase II build-out would adversely impact traffic, Playa Vista has no responsibility for mitigation. They are under a vague obligation to make a contribution to the design and mitigation of traffic problems, but there is no fixed time-certain by which Playa Vista must accomplish mitigation. They could do it years from now—or never.

**Response 64-4**

The Draft EIR includes a Draft Mitigation Monitoring and Reporting Program (MMRP) in Volume II, Technical Appendix C. The MMRP includes an introductory section that explains the various monitoring and enforcement procedures. The introduction is followed by a listing of all proposed mitigation measures with information regarding the following for each item: enforcement agency, monitoring agency, monitoring phase (i.e. at what time), monitoring frequency, and action indicating compliance with mitigation measures.

At locations where the mitigation program calls for the Proposed Project to contribute to the design and implementation of the measure, the contribution is expected to ensure that these improvements will be implemented. All of the proposed signal system improvements are currently scheduled to be implemented.

**Comment 64-5**

When Playa Vista Phase I was approved, the backers promised to complete Phase I development before requesting approval of Phase II. Expediting Phase II is [a] dangerous move, likely to result in a [*sic*] unacceptable high cost to the city. What's the rush?

**Response 64-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

There is no requirement that consideration of the Proposed Project be delayed until completion of the Playa Vista First Phase Project. The First Phase Project was included as a related project, as identified in Section III.B, Identification of Related Project, on page 193 of the Draft EIR, and included in the Cumulative Impacts analyses of the environmental topics, as applicable.

**Comment 64-6**

The attached e-mail dated December 15, 2003 has been sent to our councilmember, Cindy Miscikowski. Please make this e-mail part of the public record.

Also, please count this e-mail as a response in opposition to City Council approval of captioned project.

**Response 64-6**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 65**

Bruce Campbell  
614 Gretna Green Way  
Los Angeles, CA 90049

**Comment 65-1**

The following are my comments on the Village at Playa Vista proposal which has a host of problems and which is quite premature considering the fact that much of Playa Vista Phase I has not been built, and there are still a sizable number of already constructed units which are not sold or rented.

In this comment, I will use these abbreviations: PP = Proposed Project; PV = Playa Vista; DEIR = Draft Environmental Impact Report; , SM Bay = Santa Monica Bay; N-IFZ = Newport-Inglewood Fault Zone; N-IZOD = Newport-Inglewood Zone of Deformation. (N-IFZ and N-IZOD are two terms for this major seismic feature in the area).

**Response 65-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 65-2**

ALTERNATIVE 1--the NO PROJECT ALTERNATIVE must be chosen because the PP will further decrease habitat for wetland and other creatures in the area of this historic and seasonal wetland, the PP is between 2 faults parallel to and related to the major N-IFZ, the Compton--Los Alamitos Fault may run beneath the site, the City of LA General Plan Safety Element says the area is prone to liquefaction and that the PP site of within an official liquefaction zone, there are toxic and potentially explosive gases in the area (which must be examined related to seismic setting and gas storage in the Ballona area), there are unmitigated traffic problems and associated threat to people with asthma and other ailments which are worsened by air pollutants, the area is prone to tsunami, the area is prone to subsidence, and the PP would [sic] reduce wetland habitat, raptor-foraging opportunities, kill rodents which are an integral part of the food chain of the wetlands and escarpment area, and would eliminate a migratory bird nest. (It should be noted that native willows were removed by PV contractors at the PP and in other areas both west and east of Lincoln Blvd., plus other vegetation as well as wetland habitat was bulldozed/scraped/destroyed in the PV Village area--so the claim that restoring a slope and restoring and slightly moving the riparian area is not an overall benefit for habitat of the area.



**Response 65-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The No Project Alternative does not meet any of the basic Project objectives. See Section VII, Alternatives, of the Draft EIR on page 1274.

Section IV.D., Biotic Resources, of the Draft EIR provides a detailed environmental impact analysis for the Proposed Project regarding Biotic Resources. As indicated therein, with the exception of impacts on rapter foraging area and short-term loss of marginal nesting habitat for common migrant birds, the Proposed Project, with implementation of mitigation measures, would not result in unavoidable adverse impacts on biological resources.

The Draft EIR provides a detailed environmental impact analysis for the Proposed Project regarding Earth and Safety/Risk of Upset in Sections IV.A and IV.I, respectively. As indicated therein, the Proposed Project, with implementation of mitigation measures, would not result in significant earth or safety/risk of upset impacts. The Draft EIR provides a summary of comparative impacts between the Proposed Project and Alternative 1: No Project in Subsection 4.1.3 in Section VII, Alternatives, on page 1273.

Relating to liquefaction hazards at the site, as discussed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256, there exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. Nonetheless, the City of Los Angeles Department of Building and Safety (LADBS) requires site-specific geotechnical investigations for issuance of building permits for individual structures. Given that LADBS requires site-specific investigations (including liquefaction risk assessment) prior to construction, and further, that application of engineered fill soils in building pads would address the potential for liquefaction directly under structures; hence, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

**Comment 65-3****TRAFFIC**

A. [T]he formula predicting traffic at various intersections in the future is skewed to overinflate the number so that even if only a few less vehicles (compared to the ridiculous future projection) use an intersection due to Playa Vista Phase II mitigation measures, they conclude that it will be sufficient mitigation for this huge project despite many intersections receiving E or F grades.

**Response 65-3**

The commentator suggests that the methodology overinflates future background traffic to skew the analysis so that Project trips would have less impact on the study intersections. Actually, just the opposite is true. The same number of Project trips would have a greater chance of creating a significant impact on a more congested intersection than on one where the growth in background traffic was underestimated. This occurs because the City of Los Angeles' criteria for significant impact (as shown in Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 833 allows fewer new Project trips to be added to an intersection as the background congestion level of the intersection increases.

For a discussion of traffic model methodology, See Topical Responses TR-1 and TR-3, Playa Vista Transportation Model and Related Projects, respectively, on pages 445 and 453, above.

**Comment 65-4**

B. [S]ince PV's public outreach emphasizes that PV is trendy and upscale (and emphasizes its proximity to the Marina del Rey and Santa Monica 3rd Street Promenade areas), where is the proof that a mere 24% will travel to the "north" from PV--to the combined destinations of Marina del Rey, Venice, Santa Monica, Pacific Palisades, Malibu, Mar Vista, West L.A., Brentwood, and perhaps Westwood (the latter to the northeast)? This alleged percentage should be much higher, whether one is referring to working or dining in daylight hours, or playing or dining in evening hours. (By the way, both Marina del Rey to the west-northwest and Venice to the northwest are considered "north" in these PV-related traffic calculations.)

**Response 65-4**

Please See Topical Response TR-2, the Village at Playa Vista Trip Distribution, on page 451 above, for a discussion of the trip distribution.

The generalized trip distribution figures summarized on page IV-7 of Appendix K-2 of the Draft EIR show project trip distribution for the morning and afternoon peak commute hours. Therefore, the trip patterns primarily represent home-to-work trips since most of the peak hour trips to/from the Proposed Project are commute trips (since the predominant land use is residential). The commentator's discussion of shopping/dining trips to the Marina del Rey and the Third Street Promenade areas describe trips that generally would not occur during the peak commute hours. There are relatively few jobs in the Pacific Palisades, Malibu, Brentwood, or Mar Vista areas to attract home-to-work trips as compared to the Los Angeles International Airport, Century Boulevard Corridor, and El Segundo areas to the south. Thus, the model predicts that most of the home-to-work trips will be destined to the east and south.

**Comment 65-5**

C. [W]here is the proof that people of the socioeconomic categories who can afford to purchase condominiums at PV will use municipal transit or even shuttles from the PV vicinity to their destinations?

**Response 65-5**

The proposed transit enhancement mitigation measures are designed for use by Playa Vista residents and employees and to meet the existing and future demand of other transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the mitigation would be effective to reduce potentially significant impacts to less-than-significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections. For a more detailed discussion of the effectiveness of the transit mitigation measures, please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455.

The Metropolitan Transportation Agency launched a very successful Rapid Bus program along the Wilshire Boulevard corridor and generated a 23 percent increase in bus ridership along a corridor that already had one of the highest ridership profiles in the region. The demographics of the Wilshire Boulevard patrons are not that different from the expected Playa Vista residents and employees. The Rapid Bus deployment proves that quality bus service can attract ridership among all demographic levels in Southern California.

**Comment 65-6**

D. [A]s far as destinations of shuttles from PV, there is an emphasis on shuttles to Howard Hughes Center, Marina del Rey, and Fox Hills Mall (besides to other parts of PV). However (sorry overweight Americans), but I consider all 4 of these destinations to be quite walkable from PV, and it makes sense to have shuttles to Santa Monica, Venice, perhaps to Mar Vista/West L.A., and to the commercial areas of Westchester (on Lincoln Blvd. and on Sepulveda between Manchester and LAX).

**Response 65-6**

Destinations as far away as Santa Monica, Westchester, and West LA are not appropriate for a shuttle service because headways are more difficult to maintain at these distances. This leads to either an increased number of vehicles to maintain acceptable headway (frequency between arrival of buses) or an increase in the size of the transit vehicle to accommodate the passenger demand. The former makes the shuttle service too costly to operate and the latter results in inappropriately sized vehicles operating on local streets within the Proposed Project.

The outlying destinations cited in the comments are proposed to be served by the increased transit buses purchased for the Santa Monica Big Blue Bus (by the previously approved Playa Vista First Phase Project) or for the Culver City Bus Company by the Proposed Project.

### **Comment 65-7**

E. [I]t is ridiculous to claim that the Jefferson and Centinela intersection is the only unmitigatable [*sic*] intersection in the greater PV vicinity. Centinela (and Bundy further north) has increasingly horrendous traffic especially in the last year (and PV Phase I is nowhere near full and nowhere near complete). Certainly one of the traffic mitigations should be to pay for a few more buses for the #14 Santa Monica Blue Bus Line (to increase their frequency) to at least try to have an alternative to gridlock on Centinela/Bundy.

### **Response 65-7**

Figures 4-5 and 4-6 on pages IV-7a and IV-7h in Appendix K-2 of the Draft EIR show the amount of Project traffic that is expected to utilize the Centinela and Bundy corridor north of the Proposed Project. The heaviest Centinela Boulevard traffic flow by project trips is felt between Jefferson Boulevard and Culver Boulevard. Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 887 describes the proposed corridor improvement to Centinela Boulevard that is included in the project mitigation program.

As the commentor suggests, the addition of transit service in the Centinela corridor is also included in the mitigation program. Figure 5-1 on page V-1a of Appendix K-2 of the Draft EIR shows that additional bus service will be added between Washington Place and Jefferson along Centinela through the addition of a bus to the Culver City Bus Line 2.

North of Washington Place to I-10, Figures 4-5 and 4-6 on pages IV.7a and IV.7h in Appendix K-2 of the Draft EIR show approximately 20 project vehicles per hour per direction in the morning peak hour and 20-29 project vehicles per hour per direction in the afternoon peak hour. North of I-10, the project trip levels fall to less than 10 trips per hour per direction during both the morning and afternoon peak hours. These levels of Project traffic are not high enough to cause a significant impact or to require mitigation.

### **Comment 65-8**

F. [D]ue to the Phase II approval process coming ahead of much of the construction (and even planning for some areas) of Phase I, the City of Los Angeles will lose its clout to enforce a traffic cap on total output of vehicle journeys relating to the office portion of PV. If capacity is exceeded relating to Phase I predictions, then PV was to reduce their development master plan in order to not exceed predicted vehicle journeys relating to the PV site. Sadly, due to the moving up of the Phase II process as compared with construction and habitation of Phase I, the City will lose this clout to scale back the master plan and thus there would be substantial gridlock (and yes, even greedlock) on many streets in the PV region.

**Response 65-8**

Please see Topical Response TR-9, Traffic: First Phase Project (VTTM 49104) Condition No. 116, on page 470.

**Comment 65-9**

G. [D]ue to the discrepancy in timing (as mentioned in “F” above), I do not believe that footnote “f” below Table 1 on page 85 of Book 1 of the DEIR would necessarily apply--that is, that all required improvements to help mitigate increased traffic would need to be “funded, completed, or resolved to the satisfaction of LADOT.”

**Response 65-9**

Please see Topical Response TR-9, Traffic: First Phase Project (VTTM 49104) Condition No. 116, on page 470.

**Comment 65-10**

H. [P]redicted traffic patterns should relate to reality (as well as can be predicted) rather than reach convenient conclusions that traffic will travel in directions where there is some excess room for it. Certainly an FEIR must do surveys of destinations of workers and residents, and look into more realistic destinations for vehicle journeys at various hours of the day and evening.

**Response 65-10**

The trip generation for the Proposed Project was developed using the rates and equations from the nationally-accepted Informational Report *Trip Generation, VI Edition, 1997*, published by the Institute of Transportation Engineers (“ITE”). The ITE document uses a statistically valid number of data points (i.e., residential driveway counts) in developing residential trip information. ITE uses a similar methodology for office and commercial uses. The Proposed Project size, consisting of residential, office, and other commercial uses, would all fall within the size range of survey data used in the development of ITE Trip Generation Rates and Equations for the respective land uses.

The ITE document is a reliable source of information that provides statistically valid data (regression equations and weighted average rates) on trip-making for the project uses based on actual surveys performed around the Country. This is the state-of-the-art industry standard document for Trip Generation utilized around the Country and in the City and County of Los Angeles.

This report is used by transportation agencies throughout the nation, including the City and County of Los Angeles and numerous other cities throughout Southern California to estimate trip generation for projects.

Please see Topical Responses TR-1, Playa Vista Transportation Model, and TR-2, The Village at Playa Vista Trip Distribution, on pages 445 and 451, respectively, for discussion on trip distribution, path choice and model validation.

### **Comment 65-11**

I. I urge that the FEIR contain hard data on current levels at many intersections (including data on weekends and in summer) as well as consider coast-related traffic, realistic projected levels considering PV and all other proposals in the region and the approximate scale for which these may be approved, plus determine which residential streets would likely see a notable increase due to drivers seeking to avoid traffic jams on major streets in the vicinity.

### **Response 65-11**

The weekday A.M. and P.M. peak hour was used in evaluating the Proposed Project's impacts based on the Proposed Project's trip generation and the traffic volume on the street system. Traffic counts generally in the Los Angeles area are higher during the weekday period due to the high number of work related trips. The Proposed Project's trip generation is highest during the weekday morning and afternoon commute period than during any other hours of the week. This is, in part, due to the Proposed Project's office uses which generate significantly greater trips during the week than on weekends. Therefore the highest Project impacts would be felt during the hours analyzed in the Draft EIR.

Data at intersections was based on traffic counts as discussed in Subsection 2.2.3.1 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR. Further, the traffic analysis factors in 96 related projects (listed on page 194 of the Draft EIR). This issue is discussed further in Topical Response TR-3, Related Projects, on page 453. Finally, the potential impact on residential traffic is discussed further in Subsection 3.4.7 of Section IV.K.(1) of the Draft EIR, beginning on page 872 and in Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, above.

### **Comment 65-12**

J. [P]redicted traffic increases in intersections such as residential cut-through areas such as Washington Blvd. and East, Washington Blvd. and Berryman, Washington Place and Berryman, Washington Place and East, Washington Place and McLaughlin, and Venice and McLaughlin need to be surveyed for and carefully evaluated (besides many other intersections) in regards to how PV Phases I and II impact them.

**Response 65-12**

The Draft EIR measured the impact of Proposed Project traffic on the street system in the area. Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presented an analysis of potential neighborhood impacts that could be caused by project traffic, and the intersections listed in this comment were not found to be among the areas of potential impact. In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means. See Topical Response TR-5, Neighborhood Traffic Impacts, on page 458 above.

**Comment 65-13****LIQUEFACTION**

It is disingenuous to claim in Book 1 of the DEIR on page 19 that "a significant impact related to liquefaction is not expected, as the Proposed Project would not cause or accelerate liquefaction hazards which would result in substantial damage to structures or infrastructures, or expose people to substantial risk of injury." I also note that page 239 of Book 1 of the DEIR says, "Liquefaction and subsidence potential has generally been found to be greatest where the groundwater level is shallow and loose fine sands occur within a depth of 50 feet or less." Due to the combination of seismic setting and the thousands of years of alluvial soil deposited on the floodplain of the Los Angeles River and Ballona Creek, there is already a serious liquefaction hazard. Just because PV Phase II construction may not accelerate the hazard in any given location does not mean 1.) that the liquefaction hazard is not real; or 2.) that there will be a huge increase in buildings which are inhabited by people. Thus, putting buildings (beyond the current sheds, warehouses, maintenance buildings) in liquefaction hazard zones and packing them with people (whether one is talking office, retail, or residential) certainly substantially increases risk of injuries to people while wreaking substantial damage to structures and infrastructures of the area. (A related example could be a cliff. One could get killed or seriously injured falling over a cliff. Putting thousands of times more people in the vicinity of a cliff will likely lead to more deaths and injuries, even though the cliff is of the same slope and steepness.)

Page 183 of Book 1 of the DEIR for the Village at PV says that, "The City of Los Angeles General Plan Safety Element indicates that the PV area is subject to potential liquefaction and the Proposed Project site is within an official Liquefaction Zone."

**Response 65-13**

Relating to liquefaction hazards at the site, as discussed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256, there exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. Nonetheless, the City of Los Angeles Department of Building and Safety (LADBS) requires site-specific geotechnical investigations for issuance of building permits for individual structures. Given that LADBS requires site-specific investigations (including liquefaction risk assessment) prior to construction, and application of engineered fill soils in building pads would address the potential for liquefaction directly under structures, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

**Comment 65-14****SUBSIDENCE**

I want to point out two questions which indicate concern about possible subsidence in the Ballona Gap/Baldwin Hills vicinity. An article by 2 geologists with Woodward-Clyde Consultants in California Geology, July 1981, says on page 2, “The Baldwin Hills area has several well developed fault scarps; surface faulting has been documented on subsidiary faults, which experienced slip leading to the 1963 Baldwin Hills Reservoir failure (Kresse, 1965). (This is Attachment #A). Unfortunately, the surface faulting in the Baldwin Hills is clearly associated with surface subsidence effects making assessment of the tectonic effects very difficult.”

I note that page 183 of Book 1 of the DEIR says that, “The Proposed Project site is not located within a City of Los Angeles Fault Rupture Zone of an Alquist-Priolo Special Studies Zone.” I contend that such non-designation is due to political pressure rather than geophysical reality since footnote “b” in Table 6 says that, “Recent academic studies indicate that the Compton-Los Alamitos blind thrust fault could pass beneath the Proposed Project site at considerable depth. (Considerable depth means that there is no fault rupture at the surface; yet the Compton-Los Alamitos fault is still considered active because it meets the requirements as set forth in the Alquist-Priolo Act of 1972.)” Thus, the area qualifies for the Alquist-Priolo Special Studies Zone, but there is too much political pressure by developers to bring reason and very careful analysis into the process.

**Response 65-14**

As discussed in Subsection 2.2.2.2.1, of Section IV.A, Earth, of the Draft EIR on page 224, the Compton-Los Alamitos Fault may pass beneath the Proposed Project site at a depth of 3 to 6 miles below the ground surface. Given the depth of the fault, the potential for surface fault rupture hazards to structures or people at the Proposed Project site is considered extremely low. The potential for groundshaking impacts to the Proposed Project in the event of an earthquake along this fault would be no greater than groundshaking impacts from any other local fault, since seismic waves propagate from earthquake epicenters radially to all surrounding areas. Therefore,



the potential for groundshaking at the Proposed Project site could, depending on the magnitude of the earthquake event, be greater if the earthquake were generated along the Newport-Inglewood Fault than along the Compton-Los Alamitos Fault, even though the Newport-Inglewood Fault is located 2 miles from the Proposed Project site. The Draft EIR analysis takes into account the numerous faults located throughout the Los Angeles region, and not simply those immediate to the Proposed Project site.

The remaining comment is noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

### **Comment 65-15**

Though the following quotes refers to the aquifer which goes west to the Charnock Fault, yet it should be pointed out that it helps make the case for the existence of the Charnock Fault (which is being denied by PV personnel to help the approval likelihood especially for a development they hope to construct at the east end of PV), while one should realize that the aquifer referred to here is more or less linked to aquifers further west (though the ones further west can see even more of the saltwater intrusion which the water company shows concern about below). Here are quotes from a November 21 article by Carolanne Sudderth of the Ocean Park Gazette: “The Charnock field is bounded by the Santa Monica Mountains on the north, the Overland Avenue Fault on the east, the Ballona Escarpment and Baldwin Hills on the south, and the Charnock fault on the west.” Three little paragraphs (all in a row) near the middle of the article say, “Now, the City and the SCWC” (which is the Southern California Water Company) “claim that their combined extractions may exceed the basin’s 11,000 acre-foot capacity--when and if drinkable conditions are restored. A subsidiary of American States Water, one of the largest publicly traded utilities on the New York Stock Exchange, SCWC is asking for the establishment of a water management plan that would determine the safe operating yield of the Basin, and the appointment of a water master or equivalent managing entity. They state that without a basin management plan, continued extractions may result in lowering the water levels, and the SUBSIDENCE of the land beneath it. The intrusion of sea water (nature does abhor a vacuum) would further diminish both the quantity and the quality of the available water.” (This article is ATTACHMENT [*sic*] # B).

Thus, the FEIR must examine in detail possible subsidence relating to aquifer water mining as well as PV’s on-site dewatering preceding construction and otherwise, as well as possible subsidence relating to faults which parallel the not-far-away Newport-Inglewood Fault Zone/Newport-Inglewood Zone of Deformation.

### **Response 65-15**

As discussed in Subsection 2.2.2.4 of Section IV.A, Earth, of the Draft EIR on page 237, the Charnock Fault’s existence is not dismissed, but the geotechnical studies referenced in the analysis (Appendices D-4 and D-5 of the Draft EIR) conclude that the fault is not present beneath the Proposed Project site. Although the fault is known to exist in the vicinity of the Proposed Project site, there is no evidence to suggest that the fault is present within the geologic

formations that underlie the Proposed Project site or the adjacent First Phase Project site. As pertains to seismic faults and tectonic processes in the Proposed Project vicinity, as discussed in Subsection 3.3, of Section IV.A, Earth, of the Draft EIR on page 245, all construction at the Proposed Project site would conform to all applicable building and safety codes related to seismic safety. As such, impacts to people or structures resulting from seismic activity, irrespective of the origin of a seismic event, would not be significant.

As described in Subsection 3.4.1.2 of Section IV.A., Earth, dewatering operations may be required for temporary construction or for permanent water control to maintain groundwater below subterranean parking structures and associated methane mitigation systems. All construction dewatering and permanent building dewatering would occur within the upper portions of the Bellflower Aquitard. No deep dewatering wells will be utilized (Appendix F-1 of the Draft EIR). The precise quantities of dewatering during construction and long term operation of dewatering systems is dependent on local conditions around each building. Therefore, qualitative analyses were conducted in the Draft EIR (Appendix F-1 of the Draft EIR on page 2-34).

In addition to construction and permanent building dewatering, if necessary, groundwater may be extracted within the Proposed Project site for remediation purposes. The need for groundwater remediation within the Proposed Project site will be determined by the Regional Water Quality Control Board in accordance with Cleanup and Abatement Order No. 98-125.

The typical low permeability of the upper Bellflower Aquitard sediments will limit the distance to which changes in water level will propagate (Appendix F-1 of the Draft EIR on page 2-37). There will be no significant impact on freshwater-saltwater interface resulting from construction and long-term operation of dewatering systems.

As stated in Subsection 2.2.2.4 of Section IV.A, Earth, of the Draft EIR, the potential for subsidence due to permanent dewatering systems was specifically evaluated by Group Delta Consultants (See Appendix D-6). Based on the evaluation, Group Delta Consultants concluded that the combined effect of the dewatering systems and the excavation of garages would result in a low net heave of only 0.5 inch.

As such, as stated in Subsection 3.4.1.2, dewatering activities during construction and operation of the Urban Development uses are anticipated to result in a less than significant impact.

### **Comment 65-16**

#### **TSUNAMIS (and SEICHES)**

Page 241 of Book 1 of the DEIR admits under “2.2.2.7 Tsunami and Seiche” that, “The Proposed Project site is located in a very low-lying coastal area and could be subject to inundation by earthquake-generated sea waves known as tsunamis.” I disagree [*sic*] with the claim that locally-generated tsunamis only have the potential for run-up of an additional two feet

(resulting in a maximum run-up of 9.9 feet AMSL). While it may be true that there is no clear data to assist one in estimating potential hazards from tsunamis to the PP, but certainly:

1. THERE MUST BE A LOT MORE THOROUGH EXAMINATION OF A RANGE OF OFF-SHORE FAULTS IN THE SANTA MONICA BAY, SANTA BARBARA CHANNEL, AND PACIFIC OCEAN, AND HOW THESE COULD TRIGGER TSUNAMIS AND SEICHES.

### **Response 65-16**

Earthquake and fault data, including data pertaining to off-shore faults, are considered by the State Geologist in the assessment of earthquake hazards, as offshore faults have comparable potential for onshore effects as do onshore faults. As shown in Tables 6 and 7 on pages 221 and 222, respectively, and in Figure 17 on page 223, of Section IV.A, Earth, the Draft EIR includes data for, and addresses impacts from, offshore seismic faults. The information and data provided at the websites indicated by the commentor, while supportive of the existence of seismic hazards in the region, do not present any substantive new information relative to the impacts of the Proposed Project. These websites outline current ongoing efforts to characterize and study tsunami events and associated hazards, but do not disclose any conclusions suggesting that the analysis of tsunami hazards, as presented in the Draft EIR, is in any way inadequate. Although there exists the potential that submarine faults could cause tsunami events, both from seafloor motion and from submarine canyon slumping (undersea landslides), the impacts to coastal areas have been addressed in the Los Angeles County Interim Emergency Response Plan for Tsunami Operations. Irrespective of the cause, this plan sets forth procedures to minimize potential adverse impacts to life and property in the event of a tsunami. As discussed in Subsection 2.1.2 of Section IV.A, Earth, of the Draft EIR on page 206, although portions of the Proposed Project site may lie within the maximum predicted run-up elevation of tsunami-related floodwaters (although unlikely), implementation of the provisions and procedures in the County's tsunami emergency operations plan would address the potential of significant adverse impacts to people or structures in the event of a tsunami. Accordingly, as indicated in the Draft EIR, the Proposed Project would not cause or accelerate hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

### **Comment 65-17**

2. [H]ow the Santa Monica Submarine Canyon aimed at the general Ballona area, combined with a thorough examination about the "BATHTUB EFFECT" of the Marina/Ballona area being situated (where the Bay meets the shoreline) at the latitudinal center of Santa Monica Bay, can lead to especially intense tsunamism and seiches.

### **Response 65-17**

The potential for tsunami impacts are not necessarily dependent upon the orientation of off-shore canyons, since tsunami waves propagate radially from the undersea event (e.g., earthquake, landslide). The fact that the Santa Monica submarine canyon is "aimed" at the Ballona Gap has

no effect on the probability or intensity of tsunamis in the Santa Monica Bay. As pertains to the location of the Proposed Project site in the Ballona Gap, the intensity of tsunamis is dependent upon the location of the source event, which determines the direction in which the waves' energy is concentrated. Even if tsunamis were to be headed directly on-shore at the Ballona Gap (that being a floodplain, the lowest land elevation in the Santa Monica Bay vicinity), such circumstances were considered in the assessment of predicted run-up elevations. The predicted run-up elevation referenced in the Draft EIR is the maximum predicted run-up elevation. This incorporates the factors of tsunami size, direction, and point of impact, which in this case, was the Ballona Gap. Given that such conservative assumptions were employed to predict the maximum (or worst-case) probable event, the assessment of tsunami impacts is considered representative of actual conditions. As relates to seiches resulting from seismic events, the only bodies of water with the potential for seiching in the Proposed Project vicinity are Marina del Rey and the Freshwater Marsh. Neither of these water bodies would have the potential to adversely affect the Proposed Project if seiching were to occur. Also, please See Response 65-16, above.

### **Comment 65-18**

3. [E]xamine how an offshore or even onshore quake could lead to SLUMPING of the Santa Monica Submarine Canyon which could result in tsunami and seiches.

### **Response 65-18**

Also, please See Response 65-16, above.

Seiching is not related to slumping or even tsunami events; rather, seiching occurs in a contained water body (e.g., lake, reservoir, swimming pool) during an earthquake, when the water sloshes over the edge(s) of the basin in which the water is contained. As such, offshore slumping could not lead to seiching in local water bodies near the Proposed Project site.

### **Comment 65-19**

4. [E]xamine info available about the very serious tsunami which struck Santa Barbara in 1812 which was caused by a Mw~7.1 quake in the Santa Barbara Channel, which in turn seemed to have been triggered by the Mw~7.5 Wrightwood quake on the San Andreas Fault 13 days earlier.

### **Response 65-19**

Please see Response 65-18, above. Tsunamis can have substantial adverse impacts on coastal areas; however, the County's emergency response plan is intended to minimize such adverse effects to people and structures, and furthermore, such tsunamis may occur irrespective of the implementation of the Proposed Project. The potential impacts of tsunamis on the Proposed Project are discussed in Subsection 3.4.1.3, of Section IV.A, Earth, of the Draft EIR on page 255, and were determined to be less than significant.

**Comment 65-20**

5. [E]xamine the report referred to by the U.S. Geological Survey press release of Dec. 8th, 2003, about whether local active earthquake faults can trigger one another--which some refer to as cascading events--See [http://www.usgs.gov/public/press/public\\_affairs/press\\_releases/pr1823m.html](http://www.usgs.gov/public/press/public_affairs/press_releases/pr1823m.html).

(Thanks to Sir John Davis for pointing out this press release/report.) Also, note the attachment of an article by Shinji Toda and Ross S. Stein about earthquakes triggering one another on the Antarctica plate in 1998 (and related this to the Wrightwood and Santa Barbara Channel quakes of 1812 as well as to the mass of sympathetic quakes all the way up to Idaho and Wyoming) which were likely triggered by the Landers 1992 quake. The very last sentence of this Toda/Stein posting (before Acknowledgements) which is at <http://quake.wr.usgs.gov/research/deformation/modeling/papers/antarctic.html> has implications for the Ballona / SM Bay / Santa Barbara Channel area since it says, “The implications of such large and distant aftershocks for great San Andreas ruptures are provocative: A great earthquake on the southern San Andreas fault might, for example, trigger a large aftershock on the urban Newport-Inglewood fault, causing more damage than the mainshock.” (This article is ATTACHMENT #C). And consider how a San Andreas area quake could trigger a fault in the SM Bay/SB Channel/Pacific Ocean and/or the N-IFZ and how this may lead to a tsunami damaging the Village at PV and involving runup of ocean waters higher than predicted in the DEIR.

**Response 65-20**

The relationship between local active faults and potential for “cascading” earthquake events has been accounted for in the analysis of seismic hazards. The extent to which historical earthquake and fault data illustrate seismic “connections” resulting in cascading events is not known; therefore, seismic risks developed by the State Geologist and/or the United States Geological Survey (USGS) focus on the maximum credible earthquakes potentially generated by faults, as well as the surface fault rupture potential along these faults. Regardless of whether earthquake events along particular faults were the result of another earthquake along a “connected” fault or fault system, or an independent event on that particular fault plane, the potential for groundshaking and/or fault rupture remains the same. The assessment of seismic risks by the State Geologist is adequate to predict the potential for adverse physical impacts to structures and infrastructure, since the cause of seismic events does not predict the associated damage, but rather the events themselves. Additionally, all buildings would be constructed to meet all the requirements of the Uniform Building Code and the Los Angeles Department of Building and Safety, as appropriate. As such, the Proposed Project would not cause or accelerate hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

The remaining comment is addressed in Response 65-16 above, regarding seismicity and tsunamis and associated impacts to the Proposed Project.

**Comment 65-21**

SEISMICITY (but, of course, Seismicity and Liquefaction and Subsidence and Tsunami/Seiche overlap)

If one examines data for the years 2000 through 2003, one notices that the highest concentration for quakes in Los Angeles County were in the general Ballona Gap and Newport-Inglewood Fault Zone areas--with quite a concentration of small plus what could qualify as a moderate quake in the Baldwin Hills, Culver City, Beverly Hills, Ballona, El Segundo, and LAX area, as well as a couple in Santa Monica Bay. If the Lincoln Boulevard Fault and the Charnock Fault do not exist, on what faults did the quakes of 4-22-03 near LA Airport, of 9-16-00 3 miles SSW of Culver City, and of 8-1-00 2 miles NNW of Hawthorne occur on?

**Response 65-21**

The seismic events noted by the commentor were considered minor earthquakes by the Caltech Seismology Lab. The magnitude of the event on 4-22-03 was 2.5, on 9-16-00 it was 3.3 (this event was extensively discussed in Section IV.A, Earth, of the Draft EIR on page 226), and the 8-1-00 event was recorded at magnitude 3.0. Seismic events occur frequently, particularly in the Southern California region, although the vast majority are too small to be noteworthy or traceable (See the Southern California Earthquake Data Center website for more information: [http://www.data.scec.org/about/data\\_faqs.html](http://www.data.scec.org/about/data_faqs.html)). Most of these minor events occur on unmapped faults, which have not been identified or studied and no detailed information is known. Consequently, the concentration of small, or possibly moderate, earthquakes in the Proposed Project vicinity could have occurred on any number of unnamed minor subsurface faults. Simply because these events occurred in the Proposed Project vicinity does not mean that they occurred on the postulated Lincoln Boulevard Fault or Charnock Fault. There is no evidence to suggest that any such events occurred on any identified fault, since such events are not studied in detail, given their relatively minor impacts. The alleged existence of the postulated Lincoln Boulevard Fault and the existence of the Charnock Fault beneath the Proposed Project site were evaluated in detail through the course of several technical investigations and are discussed in Subsection 2.2.2.2.4, of Section IV.A, Earth, of the Draft EIR on page 227, and supported by Appendices D-4 and D-5 of the Draft EIR.

**Comment 65-22**

I want to comment on certain of the faults mentioned in Table 6 on page 221 and on Table 7 of page 222. Under Table 6 which are called "Active Faults," the Anacapa-Dume Fault is said to be 17 miles west and it is believed that a 7.3 Richter Scale quake on this fault is the maximum credible. Is this fault a key component of the submarine canyon for Santa Monica Bay? Because the the [sic] Marina del Rey / Ballona area is basically where the middle of Santa Monica Bay reaches the shoreline, there could be a bathtub effect anyway due to earthquake and tsunami activity, and it is likely that this effect would be accentuated seeing that the Anacapa-Dume Fault likely underlays the submarine canyon in the area.

It also appears that the Elysian Park Fold & Thrust Belt (which shook in 1987, is considered capable of a 6.7 quake, and is 6.8 miles NE of the PP) is aimed at the PP area but from the east/northeast. Many things are related, and I want to give two California seismic examples about how faults which may not seem to fit exactly together are certainly linked. There is the approximately 2000 kilometer Murray Fracture Zone which meets the North American continent around Point Concepcion/Point Arguello in Santa Barbara County. If one goes inland from there to the San Andreas Fault, one notices that the San Andreas moves noticeably [*sic*] east at that point around the Garlock Fault (some call this the “Big Bend”)--and it seems quite likely that the Murray Fracture Zone is at least somewhat linked to the Garlock Fault and thus the significant bend toward the east in the San Andreas Fault in that area. The other example is on the greater central California coast north of where the Murray Fracture Zone meets the North American continent. The Hosgri Fault zone goes from the area about west/northwest of Lompoc up to northern San Luis Obispo County. There is a slight offset, but then the San Simeon Fault continues north through about the Monterey Bay area. There is another little offset, and then the San Gregorio Fault goes up and goes into the San Andreas Fault off of Marin County. These 3 faults are essentially linked, are the obvious main coastal fault in the greater central California coastal area, and are considered the largest subsidiary to the San Andreas Fault.

So to tie these two central California examples to the seismic setting in the general area of the PP, where the major Anacapa-Dume offshore fault (likely related to the path of the submarine canyon) is basically aimed at the central shoreline of SM Bay, and with the Elysian Park Fold & Thrust Belt essentially aimed at the PP (plus with other substantial faulting in the PP vicinity), it is very likely that the Anacapa-Dume and Elysian Park Faults are linked which could mean significant problems for structural stability at the PP partly due to potential for liquefaction at the site as well as intensive shaking in the region.

### **Response 65-22**

This comment is addressed in Response 65-17, above, regarding tsunamis/seiches relative to the location of the Ballona Gap and effects of orientation of seismic faults (on- and off-shore), Response 65-20 above, regarding interrelationships of seismic faults and “cascading” seismic events, and Response 65-13 above, regarding liquefaction hazards at the Proposed Project site and associated measures to reduce potential liquefaction risks to on-site people and structures.

### **Comment 65-23**

On to the Compton-Los Alamitos Thrust which, it is admitted, may run even beneath the PP at a considerable depth. It is believed to be able to deliver a 6.8 quake. Note footnote “b” in Table 6 which says that, “Recent academic studies indicate that the Compton-Los Alamitos blind thrust fault could pass beneath the Proposed Project site at considerable depth. (Considerable depth means that there is no fault rupture at the surface; yet the Compton-Los Alamitos fault is still considered active because it meets the requirements as set forth in the Alquist-Priolo Act of 1972.)” Not only is this notable because the PP area is not considered an Alquist-Priolo Act area due to political pressure, but the Compton-Los Alamitos Thrust Fault runs in the general

direction of both the Lincoln Boulevard Fault and the Charnock Fault. These faults were known, but then their surface ruptures were covered up by the developers' bulldozers, and well-paid so-called "researchers" delivered the conclusions which Playa Capital wanted to hear that these faults do not exist after all. However, look at ATTACHMENT #D where not only is there a Southern California Seismic Network (operated by Caltech and USGS) printout in regard to the 3.0 August 1st, 2000, earthquake 2 miles NNW of Hawthorne (and 1 mile SW of the Newport-Inglewood Fault Zone) likely in the LAX / El Segundo-type area, but especially note the 3.3 quake on September 16, 2000, one mile ENE of Marina del Rey (3 miles WSW of the Newport-Inglewood Fault Zone) probably in the general vicinity of the 90 Freeway and the Washington Blvd. area. If the quite reputable Caltech and USGS-related readings and printouts tell of quakes within one to three miles of the PP within a matter of 47 days in the summer of 2000, surely these epicenters and likely related faults must be displayed on maps and tables about active faults in the PP vicinity. Clearly, the Charnock Fault is the closest at least postulated fault to these seismic incidents on August 1st and September 16th, 2000. I also want to point out that various considered small and alleged to be inactive faults by document preparers were pointed out toward the top of page 227 where it says, "Four of the faults occur northwest of the Proposed Project site, near the Venice portion of the Playa del Rey Oil Field, and two of the faults occur west of the Proposed Project site, near the Del Rey Hills portion of the Field."

### **Response 65-23**

This comment is addressed in Response 65-14, above, regarding the Compton-Los Alamitos Fault, Response 65-15, above, regarding the Charnock Fault, and Response 65-21, above, regarding small local seismic events and the existence of the Charnock and postulated Lincoln Boulevard Faults.

The remaining comment is noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

### **Comment 65-24**

Since I have already broached the major Newport-Inglewood Fault Zone matter (due to their being mentioned in the ATTACHMENT D printouts), let us further address that fault zone which is often considered the major coastal fault zone in southern California. East of Long Beach, this fault runs offshore and generally runs a few miles from the coast down to the area west of San Diego. I was surprised to see the estimate that 6.9 is the maximum credible quake to be expected from this powerful fault zone. Even back in the early-mid 1980s, renowned seismologist Dr. James Brune of the Scripps Institute in La Jolla/San Diego concluded that a 7.5 quake is possible in the Newport-Inglewood Fault Zone. Other research I have encountered in the last two days about the N-IFZ also indicates that it can deliver greater than a 6.9 magnitude quake. I have heard over the years that the northern extent of the Newport-Inglewood Fault Zone was around the Mormon Temple area at Santa Monica Blvd. and Overland Ave. in West Los Angeles. I was surprised to see the map showing an eastern bend toward the northern part of the N-IFZ. However, the Overland Fault seems to be the one which I heard about which goes to the Mormon Temple area, and certainly appears to be linked to the N-IFZ. Other documents indicate that the



N-I Fault goes in the La Cienega vicinity in Baldwin Hills and then goes beneath the 10 Freeway between La Cienega and Robertson (in area of freeway collapse on 1-17-94), and another document says goes to the Century City/Beverly Hills border which is a couple miles west of the 4.2 quake of 9-9-01. I recall another couple more quakes in the upper 3s or lower 4s in the couple months following that as well with one of them considered to have its epicenter somewhat west in Beverly Hills. Thus, even with the few quakes (all of which happened to be in summer 2000 and 2001) which appeared after I searched on my computer for Newport-Inglewood Fault, it is clear that either the Newport-Inglewood Fault should be extended further north, or else the as yet unidentified faults which caused the aforementioned quakes in Attachment # D must be identified on maps, tables, and in analyses relating to the Proposed Project. Some attachments which will be submitted with my comments include different maximum credible magnitude levels for the N-IFZ as well as other faults in the greater SM Bay/Santa Barbara Channel/Ballona Gap/LA Basin/ and N-IFZ vicinity.

### **Response 65-24**

As discussed in Response 65-15, above, assessment of seismic faults and predicted earthquake magnitudes is the responsibility of the State Geologist and/or the USGS. As such, mapping and characterization of seismic faults in the Proposed Project vicinity is independent of the Proposed Project, and existing seismic classifications provide data appropriate for the Draft EIR analysis, per the applicable state and federal agencies. As relates to small and moderate earthquakes in the Proposed Project vicinity, this comment is addressed in Response 65-21, above. It should be noted that the Draft EIR's conclusions regarding the potential for significant impacts related to seismic events, and the Project Design Features that would serve to address such impacts, are not tied to any particular fault discussed in Subsection 2.2, of Section IV.A, Earth, of the Draft EIR on page 207; rather, these conclusions reflect the fact that numerous faults occur throughout the region, and the requirements of the City Department of Building and Safety and the Uniform Building Code provide an overall acceptable level of seismic safety appropriate for the Proposed Project.

### **Comment 65-25**

I am running out of time to examine other faults mentioned on pages 221 and 222, but will say that Elysian Park Foild [*sic*] & Thrust Fault appears major and is aimed directly at Ballona, the Oakridge zone is quite active, there is discussion about Malibu-Dume and Santa Monica Faults in examination of offshore quake and tsunami potential, the Charnock is estimated to be capable of a 6.5 quake and is less than a mile from the PP site, the Overland is capable of a 6.0 quake, and Santa Cruz Island fault is capable of a 6.8 quake. A lot more study needs to be done on offshore quakes and possible related tsunamis. Also the FEIR should examine the probability of part of a Hawaiian Island collapsing and bringing a major tsunami to the SM Bay area.

**Response 65-25**

This comment is addressed in Response 65-16, above, regarding on and off-shore seismic faults and associated earthquake and tsunami impacts and Response 65-17, above, regarding orientation of seismic faults and resultant tsunami impacts. As pertains to a tsunami event generated from the collapse of part of an Hawaiian Island, the ability to estimate the likelihood and consequences of such an event would be speculative, at best. Pursuant to Section 15145 of the CEQA Guidelines, such speculation is not appropriate in an environmental evaluation. Nonetheless, regardless of the source of a tsunami, adherence to the County of Los Angeles' Emergency Response Plan for tsunami operations would minimize, if not avoid, adverse impacts to people or structures at and around the Proposed Project, as discussed in Response 65-19, above.

**Comment 65-26**

I further note on page 227 says, "ETI speculated that the fault, which it refers to as the 'Lincoln Boulevard Fault,' trends north-northwesterly, dips to the west with a normal sense of slip (the west side of the structure has moved down relative to the east side of the structure), and allows methane gas that originates at depths of 500 to 3,400 feet to reach the surface."

**Response 65-26**

The comment is noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

**Comment 65-27**

ATTACHMENT #E shows the amount of reports that the US Geological Survey and Caltech received for the 5.7 quake 27 miles SSE of Calexico, CA. The zip codes reporting the quake indicate that except for some areas with skyscrapers in the downtown LA and mid-Wilshire areas, as well as a zip code near the LA River SSE of downtown LA, the areas of high reports in California were largely in the general vicinity of the N-IFZ (and its two parallel faults to the west--the Overland Fault and the Charnock Fault) in the El Segundo, Westchester, Beverly Hills, Culver City, and Marina del Rey areas. Thus even distant quakes shake more in the fault zone of the Newport-Inglewood, while shaking from a more localized event could be catastrophic and result in liquefaction.

**Response 65-27**

The suggested earthquake reporting data is not necessarily related to the physical impacts of a seismic event. Simply because a particular area had more instances of individuals reporting feeling a seismic event does not demonstrate that the intensity of the event was greater at that location than at areas closer to the event's epicenter. This may be due to a number of factors,

including population distribution, proximity to seismically-related faults, and/or the physical geologic conditions beneath populated areas (which vary over the Southern California region). This reporting data does not illustrate that groundshaking from distant events is more intense near the Newport-Inglewood Fault Zone (NIFZ), nor that people or structures in the vicinity of the NIFZ are at any greater risk from seismic events than in any other part of Southern California. As pertains to liquefaction hazards during a seismic event, this comment is addressed in Response 65-13, above, regarding liquefaction hazards at the Proposed Project site and associated measures to reduce potential liquefaction risks to on-site people and structures.

### **Comment 65-28**

#### **WILDLIFE and so-called HABITAT CREATION**

It has been said that only the Creator creates habitat--humans may rehabilitate [*sic*] damaged areas to allow natural forces to restore the area. There has been massive bulldozing and scraping of wetlands and soils both west and east of Lincoln Blvd. in the Ballona Wetlands area, and this clearly damaged [*sic*] and destroyed habitat including native willow and other habitat for migratory and other birds as well as more wetland and riparian-related habitat. While planting coastal sage scrub in place of the current iceplant on the slope below Cabora Road is a fine idea, I do not agree that habitat is increased when there has been such widespread destruction by heavy equipment, and where a riparian area has been virtually wiped out--and we are expected to believe that this needed to be done in order to slightly relocate and restore riparian habitat. It should also be pointed out that the concentration of native burials found recently at PV below Loyola-Marymount University was in the general riparian area--I generally know where I used to see a stream east of Lincoln, though PV has tried hard to bulldoze, scrape, dig, and erase any trace of the riparian area (as well as get permission to fill in some wetland areas. Unless you are seeking to use every foot available for the Urban Development Zone part of the Village at PV (and for urban development at Phase I too), why go to the trouble of destroying habitat and disturbing many native remains and artifacts when the general area will become a riparian area once again (while featuring runoff from the heavily developed PV area).

### **Response 65-28**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474, above.

The impacts to biotic resources associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995.

As described in Subsection 2.2.1.1 of Section IV.D, Biotic Resources, of the Draft EIR on page 527, “[t]he site of the proposed Urban Development Component is occupied primarily by non-native weedy species.” Furthermore, as stated in Subsection 3.4 of Section IV.D, Biotic Resources, of the Draft EIR on page 546, “[t]he Habitat Creation/Restoration Component has potential to result in an increase in the overall diversity and abundance of wildlife species due to the increased diversity of habitats compared to existing conditions.”

Potential impacts to archaeological resources, including impacts on Native American burials, associated with the Proposed Project are addressed in Section IV.P.(2), Archaeological Resources, of the Draft EIR, beginning on page 1199. Section IV.P.(2) identifies and discusses the potential impacts on CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769, and concludes, on page 1224, that implementation of the Programmatic Agreement and mitigation measures listed therein would reduce impacts on archaeological resources to a less-than-significant level.

The exact location of burials and other archaeological resources is not easily predicted, and on occasion human remains and artifacts are found during construction. As identified in the mitigation measures included in Subsection 4.0 of Section IV.P.(2), Archaeological Resources, of the Draft EIR on pages 1222-1223, efforts will be made to avoid human remains and other archaeological resources, and unavoidable disturbance would be mitigated through data recovery, documentation, analysis and curation. The details regarding the cultural resources encountered within the Proposed Project site and treatment plans to address those resources are presented in Appendix O-3 of the Draft EIR, as well as the 1991 Research Design and Data Recovery Plan for CA-Lan-62 and CA-Lan-211, which have been included in the Appendices of the Final EIR. In cases where human remains are encountered, the Applicant shall comply with the Programmatic Agreement and the requirements of the California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. The Most Likely Descendant designated by the Native American Heritage Commission for Playa Vista has provided guidelines for the handling of human remains. The guidelines would be considered in connection with the handling of Native American remains discovered during construction of the Proposed Project.

The remaining comments are noted and will be incorporated into the Final EIR for review and consideration by decision-makers.

### **Comment 65-29**

PV Phase II proposes to remove / “take” a nest of a migratory bird--violating the Migratory Bird Act.

### **Response 65-29**

The Proposed Project does not propose the removal of an active migratory bird nest. Subsection 4.0 of Section IV.D, Biotic Resources, of the Draft EIR on page 550 proposes the

implementation of construction mitigation measures to protect nesting birds protected under the Migratory Bird Treaty Act or the California Fish and Game Code.

**Comment 65-30**

I also oppose the reduction in raptor habitat which would take place under the PP.

**Response 65-30**

Section IV.D, Biotic Resources, of the Draft EIR on pages 547 and 552 states that “[t]he Urban Development Component of the Proposed Project would result in a net loss of foraging area for raptors such as Cooper’s hawk, but this loss is unlikely to affect long-term survival of the species *due to the restoration components of the Project and presence of more diverse foraging opportunities off-site in the nearby Ballona Wetlands.*” (Emphasis added). In considering potential impacts of loss of raptor foraging area, the probable size of the prey base and its capacity to support predators must be evaluated in addition to total acreage of land. The conclusion in the Draft EIR, quoted above, is based on an assumption that the increase in diversity of cover and native vegetation resulting from the Habitat Creation/Restoration components of the Proposed Project will increase the abundance of rodents, snakes, lizards, and small birds that form the food base for raptors, including Cooper’s hawk.

**Comment 65-31**

What substances would be used for “rodent control?” Will this add toxic contamination to the area? I have seen signs of significant herbicide use in a formerly unpaved parking area north of Jefferson in the block east of Lincoln not too far from the PV Visitors Center. From what I could see through binoculars from Cabora Road on 12-21-03, it appeared that there may have been significant spraying toward the north part of the PV Village area south of where McConnell meets Jefferson.

**Response 65-31**

Subsection 4.0, Section IV.A, Earth, page 267 of the Draft EIR, includes a mitigation measure requiring rodent control during grading of the Proposed Project. As required in that mitigation measure, the rodent control program shall comply with all applicable local, state, and federal regulations, including those which serve to protect natural resources that could be affected through urban run-off.

Furthermore, the Operations, Maintenance, and Monitoring Manual for the Ballona Freshwater Wetland System, Appendix F-2 of the Draft EIR, requires implementation of a public education program for all of Playa Vista regarding storm water runoff and the use of pesticides. This program, along with an Integrated Pest Management Program (IPM), is currently being developed with the objectives of providing alternatives to use of environmentally toxic chemicals

and avoiding pesticide contamination. The IPM Program will meet all local, state and federal regulatory requirements pertaining to the protection of natural resources.

### **Comment 65-32**

It is mentioned that non-native plants on the slope to be restored will be “hand-pulled.” I approve of hand-pulling, but does that wording indicate that herbicides will not be used--or can herbicides be used as long as the dead plants are hand-pulled at a later time. The FEIR must clarify exactly what the herbicide/pesticide/rodenticide policy is for the proposed PV Village area--and how this will impact wildlife in the riparian, freshwater marsh, and other areas which will get urban and landscape-management-related runoff from PV.

### **Response 65-32**

Please refer to Response 65-31, above. The use of herbicides, if any, in the removal of non-native plants within the Bluff Restoration area will meet all local, state and federal regulatory requirements.

### **Comment 65-33**

Also, when I went to Loyola/Marymount on 12-21-03 and walked down the hill to Cabora Road, there was at least a few acre lake/wetland with considerable standing water which I noted was south of where McConnell meets Jefferson--but closer to the southern slope/Ballona Escarpment from where I noticed what appeared to be a heavily herbicided area to the north. Though I'm not much of an artist, and preliminarily drew a figure from not quite straight on, but I will include just before I sign this comment letter a rendering of this lake/wetland currently on the PV Village site. What will happen to this lake/wetland under this proposal? Was this water diverted from the Centinela Ditch riparian area in order to allow more bulldozing, scraping, and messing with native burials and artifacts in the former riparian area which is supposed to become a future riparian area (not far away from old riparian area) under the PV Village proposal? To help clarify its location, besides being closer to the southern end opposite where McConnell meets Jefferson at the northern end of the proposed PV Village area, there are 4 or 5 palm trees toward the west and somewhat northwest part of this body of water, and there is one sizable palm tree at the east/south central/ east part of that lake/wetland as well. If this lake/wetland is destroyed under this PP, is the related habitat loss accounted for in the EIR?

### **Response 65-33**

The “lake/wetland” referenced by the commentator is not a jurisdictional wetland, but the temporary erosion control basin constructed as part of the annual erosion control plans approved by the City Department of Public Works to support construction of the First Phase Playa Vista Project. The temporary erosion control basin will not remain as part of the Proposed Project.

The erosion control basin is discussed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474, above. Please also refer to Response 65-28.

**Comment 65-34**

P.S. In the FEIR, please thoroughly study the way structures react in earthquakes, including the studying of vertical as well as horizontal ground acceleration [sic].

**Response 65-34**

The effects of seismic ground motion on structures has been extensively studied, and the conclusions of such research have been incorporated into the seismic design standards of the Uniform Building Code (UBC), California Building Code (CBC), and the City of Los Angeles Department of Building and Safety.

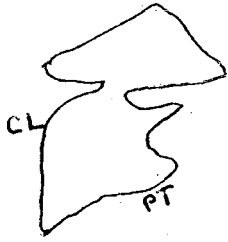
Such building codes and standards, particularly in California, were developed, and are intended, to establish minimum requirements for structures to provide safety of a building's occupants during, and immediately following, a major seismic event. It is not intended to provide for post-earthquake operability of the structure itself. As such, the requirements of the UBC, CBC, and the City Department of Building and Safety incorporate the collective study of horizontal and vertical seismic-related ground motion, and the associated effects on structures, in order to preclude adverse impacts to such structures or their inhabitants.

**Comment 65-35**

Attachments not mentioned within the text of the comment include: F. Huntington Beach Emergency Services about N-IFZ and Liquefaction; G. KFWB report on N-IFZ; H. UCSB seismologists discussing SM Bay / Santa Barbara Channel seismicity; I. USGS on Seismic Hazard Mapping; J. Hauksson on seismic setting; K. Summary of 3D Fault Meeting; L. USGS 12-8-03 Press Release; M-1 first page of Borrero et al on Tsunamis in SB Channel; M-2 Synolakis et al on Evaluating Tsunami Risk in CA; N. SM Mirror [sic] on PV Problems; and O. ETI 4-17-00 report on Subsurface Methane. (Unfortunately, I currently cannot locate Attachment #D about local quakes I mentioned within the comments).

**Response 65-35**

These attachments are included as Comment Nos. 65-43 through 65-52, below.

**Comment 65-36**

This is a drawing of the body of water/ lake/ wetland that I viewed on 12-21-03 from Cabora Road. "CL" means a clump of 4 or 5 palm trees, while PT indicates the location of a solo yet sizable palm tree.

If one went from this lake further south (scale-wise to the bottom of the sheet of paper, it is that area that had a large blue dumpster and an upside-down small white boat). This body of water and the habitat it provides and can provide upon restoration must be addressed in the Final EIR.

**Response 65-36**

Please refer to Response 65-33, above.

**Comment 65-37**

Attachment #A

<http://www.johnmartin.com/earthquakes/egpapers/00000049.htm>

from California Geology, July 1981, Vol. 34, No. 7.

**SURFACE FAULTING ALONG THE NEWPORT-INGLEWOOD ZONE OF DEFORMATION**

By

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**INTRODUCTION**

Faults of the Newport-Inglewood zone of deformation are predominately defined in the subsurface from oil-well data and ground-water data. Very little geologic evidence of surface faulting has been found within the zone and very few instances of documentation of surface faulting exist. Even following the 1933 Long Beach earthquake (ML 6.3), no evidence of surface faulting was found or reported. The authors have recently discovered evidence of surface faulting along the North Branch of the Newport-Inglewood zone at west Newport Mesa. There, the age



relationships of faulted geologic units and man-made fill indicate that the surface faulting occurred very recently, probably during the 1933 earthquake.

## REGIONAL GEOLOGY

The Newport-Inglewood zone of deformation is one of several, large predominately right-lateral strike-slip fault zones that parallel the San Andreas fault in southern California. The Newport-Inglewood zone of deformation has been intensely investigated in the subsurface since the early 1920s by the petroleum industry, which referred to it as the “Newport-Inglewood Uplift.” Barrows (1974) refers to it as the Newport-Inglewood “structural zone.” We have chosen to refer to it as the Newport-Inglewood zone of deformation in agreement with Hill (1971).

The zone is most popularly characterized as a classic wrench fault as defined by Wilcox and others (1973) and Harding (1973). The wrench-fault model includes a deep-seated strike-slip fault in the basement rocks that deforms overlying sedimentary basin deposits. Slip on the deep-seated fault causes a series of en echelon folds and faults in the sedimentary cover. Such a structural configuration is seen at the surface and in the subsurface along the Newport-Inglewood zone of deformation (Figure 1).

### SEE FIGURE 1

Figure 1. Newport-Inglewood zone of deformation.

From north to south, the style of faulting in the sediments along the Newport-Inglewood zone of deformation varies from right-slip, with a moderate component of normal dip-slip associated with folding in the Baldwin Hills, to cross-trending short reverse faults in the Rosecrans and Dominguez Hills, and to several en echelon strike-slip fault segments in the Long Beach to Newport Beach area (figure 1). The left step from the Seal Beach fault to the Cherry Hill fault at Signal Hill is an area of compression between two en echelon right-lateral strike-slip fault segments, demonstrated by Segall and Pollard (1980).

The June 1920 Inglewood earthquake (ML 4.9, Richter, 1970) and the 1933 Long Beach earthquake (ML 6.3) are clear examples of the destructive potential of the Newport-Inglewood zone of deformation. The Long Beach earthquake resulted in 115 deaths and about \$40 million of damage in 1933 (Sherburne, 1981). Since 1933, the population density has increased dramatically along the fault zone and the death toll could be significantly higher in the event of a repeat earthquake of a similar magnitude to the 1933 event.

The Federal Emergency Management Agency (1981) recently published results of their assessment of potential earthquake hazards in California. The results of their study show that the Los Angeles area could suffer greater property damage, injury, and loss of life from an earthquake on the Newport-Inglewood zone of deformation than from the “big quake” on the San Andreas fault system. This condition stems from the fact that the Newport-Inglewood zone passes through the heavily developed western edge of the Los Angeles Basin, whereas the San Andreas passes 35 miles northeast of Los Angeles. Thus, the Newport-Inglewood zone of

deformation should be a high priority for city planners, and state and federal agencies in anticipating earthquake hazards.

## FAULTING POTENTIAL

A recent study of the Newport-Inglewood zone of deformation (Woodward-Clyde Consultants, 1979) has helped in defining the earthquake hazard potential. The results of this work demonstrate that the geologic rate of strike-slip has been relatively constant at approximately 0.5 mm/yr since late Miocene and early Pliocene in Long Beach, Seal Beach, and the Baldwin Hills. The ratio of horizontal slip to vertical slip is on the order of 20 to 1, where folding is not a major contributor to the vertical component. First motion studies of the 1933 earthquake records, collected worldwide, indicate essentially pure right slip on a northwest trending slip surface. From the seismic moment calculations of the 1933 earthquake, the average slip on the fault is estimated to have been approximately 31 to 46 cm in the subsurface (Woodward-Clyde Consultants, 1979).

These data are valuable for characterizing future earthquakes, possible recurrence intervals, and the earthquake potential of the zone. However, more near-surface faulting data are still needed to fully define the prehistoric earthquake activity.

Limited data regarding surface faulting have been developed during studies of the Baldwin Hills Reservoir failure and during investigations within the Alquist-Priolo Special Studies Zones. Presently, several sections of the Newport-Inglewood zone of deformation are included in the Special Studies Zones. However, from Huntington Beach Mesa southward, the Newport-Inglewood zone has not been designated as part of the Special Studies ones mainly because of the lack of evidence for faulting in young sediments, (Hart, 1980).

## SEE FIGURE 2

Figure 2. The study area at Newport Mesa showing the locations of observed faulting and sites of detailed studies (sites 1 and 2)

The Baldwin Hills area has several well developed fault scarps; surface faulting has been documented on subsidiary faults, which experienced slip leading to the 1963 Baldwin Hills Reservoir failure (Kresse, 1966). Unfortunately the surface faulting in the Baldwin Hills is closely associated with surface subsidence effects making assessment of the tectonic effects very difficult.

It is our understanding that a study under the Alquist-Priolo Act was recently completed and was successful in locating evidence of faulting at Landing Hill in Seal Beach. The discovery of near surface faulting at Seal Beach demonstrates that surface faulting along the Newport-Inglewood zone does exist and that other sites could yield valuable information.

## NEWPORT MESA FAULTING

The authors have recently completed studies of the Newport-Inglewood zone of deformation where the North Branch crosses west Newport Mesa (figure 2) where offset terrace deposits and surface soils can be observed in several outcrops. The most obvious and best-known exposure of offset terrace deposits is at the intersection of Pacific Coast Highway and Superior Avenue (photo 1), where the terrace deposits are faulted down on the west against shales of the Monterey Formation. Unfortunately, at this location most of the terrace deposits and all of the soils have been removed by grading and excavation. Offsets of the terrace deposits were observed in at least seven localities along the previously mapped subsurface trace (figure 2). Two of those exposures (sites 1 and 2) were cleaned by hand and documented in detail. The strikes of individual breaks observed are about 10 to 15 degrees west of north, slightly off trend from the 40 degrees west of north for the trend of the North Branch fault. This relationship is suggestive of a series of en echelon surface breaks overlying the relatively continuous lateral fault in the near surface determined from oil-well data of Hunter and Allen (1956).

SEE PHOTO 1

Photo 1. View of south-facing road cut at the intersection of Pacific Coast Highway and Superior Avenue in Newport Beach. Terrace deposits (Qt) on left are faulted against Monterey shale (Tm) on right. Arrows indicate that fault trace, location 3.

## NEWPORT MESA GEOLOGY

Newport Mesa is a Pleistocene wave-cut bench in Miocene and Pliocene marine shale overlain by Pleistocene marine terrace deposits and fluvial deposits. An assemblage of Pleistocene megafossils is usually observed at the base of the marine terrace sediments, and assigned to the substage 5a (Shakelton and Opdyke, 1975) high stand of sea level, approximately 120,000 years B. P. (Wehmiller and others, 1977). The terrace is traceable from south of San Onofre northward almost continuously to Dana point. From Dana Point to Newport Beach the terrace is traceable but is less continuous.

The terrace bench and associated fossil assemblage is present in the study area at west Newport Mesa. Near Superior Avenue a wave-cut bench on Monterey shale can be observed but farther to the west the bench plunges beneath the cliff exposures. Several beds of Pleistocene megafossils are interbedded with marine terrace deposits and possible fluvial deposits but these fossils are several feet above the wave-cut bench. A series of cross-bedded fluvial deposits and a buried soil horizon conformably overlie the marine deposits in most places. Our interpretation of the west Newport Mesa area is that at the time of deposition, the area was at the interface where fluvial deposits were alternately being interbedded with marine sediments following erosion of the substage 5e platform. The subsequent drop in sea level, and coastal uplift along the Newport-Inglewood zone of deformation formed Newport Mesa, where the authors have now documented surface evidence that these young sediments have been off-set along the North Branch fault of the Newport-Inglewood zone of deformation.

The terrace deposits at west Newport Mesa are well exposed due to heavy grading for a once-proposed extension of Balboa Boulevard, a borrow area, and road construction for oil drilling.

Two locations (figure 2, sites 1 and 2) along the North Branch fault at Newport Mesa were exposed by hand with pick and shovel to study the effects of faulting on surface soils. Site 1 is at a small gully eroded into a roadcut leading to Mobil's Banning well No. 320. Site 2 is on a cut slope east of the oil well pad.

SEE PHOTO 2

Photo 2. Site 1, exposure of faulted fluvial terrace deposits that are presented on figure 3. The 1.5 meter-high triangular wedge at the base of exposure is an apparent horst resulting from lateral slip.

SEE FIGURE 3

Figure 3. Site 1, log of faulted terrace deposits and solum on the north wall of a small gully across the fault trace.

A detailed log of the faulting exposed at site 1 is shown in figure 3. The undisturbed solum (A and B horizons of modern soil) adjacent to the site is on the order of 1.8 to 2.4 meters thick and has formed on fluvial terrace deposits. However, where the exposed fault intersects the ground surface, the top 1.2 to 1.8 meters has been eroded away and only the basal portion of the solum remains. The log illustrates a complex pattern of faulting with many splays reaching the present ground surface. The base of the solum is vertically offset down to the west a total of about 51 centimeters across the entire zone of the shears. At the base of the gully a horst block in terrace deposits is uplifted about 60 centimeters between two shears, although the net apparent vertical offset is only 15 centimeters on either side of the horst. The offset is measurable on two markers, one a buried argillic soil horizon (unit 2) and the second a gravel bed within unit 1 overlying cross-bedded sands (figure 3 and photo 2). The gravel bed, although a distinct horizon, is represented across one of the shears by slightly different facies varying from coarse gravel within the horst to coarse-grained sand in the block to the northeast. The presence of the horst, the fact that facies are different across one of the shears, and the fact that thicknesses of units vary across the zone all indicate that lateral slip has also occurred along this shear zone. However, the sense and total amount of lateral slip is indeterminate from the data gathered in this exposure.

#### TABLE 1 SITE ONE - NEWPORT MESA SOIL AND LITHOLOGIC DESCRIPTIONS

SEE PHOTO 3

Photo 3. Site 2. the fault trace (indicated by arrows) is visible on a southeast-facing slope of marine terrace deposits. The top arrow shows where evidence for the 1933 rupture was found.

Site 2 is located on a 7.5 meter high east-facing cut slope (photo 3). Although the majority of the terrace surface in the area of this exposure has been excavated, the surficial soils at this location have been spared from heavy grading because it is the site of an oil-well pump pad. However, at least two different ages of artificial fill from surficial grading are present where the fault intersects the ground surface. The fault break can be traced from the base of the slope to the top

where it vertically displaces the solum and older fill by 30 centimeters down to the west (photo 4). Bedding in the terrace deposits at the base of the slope is offset approximately 45 centimeters in the same sense, down to the west.

The offset solum at site 2, shown in photo 4 and 5 is documented in figure 4. Figure 4 illustrates numerous shears disrupting the solum and in particular a distinctive laminated, very fine-grained silty sand. The sand is offset 30 centimeters down to the west. The sand is distorted near the offset and a fragment of it clings to the upthrown hanging wall of the shear surface. The sand appears to have been deposited on a nearly flat surface, probably in an ephemeral puddle in a swale, during the rainy season or following a heavy rain storm. Thus the laminated sand represents the ground surface at one time prior to faulting.

Results from a palynology analysis of the sand tend to confirm the environment of deposition. The analysis indicates spores from fungi and algal debris such as would be found in a short-lived puddle in a prairie environment (Anderson, Warren and Associates, 1981 personal communication). The pollen type in the sample tested include thistle, oak and grass. Modern fill was found to rest directly on the laminated sand across the fault break. On the down-thrown side, debris consisting of wood fragments, tarred roofing material, newspaper fragments, and a brick were contained within the fill. The location of the brick and other debris with respect to the fault is shown in photo 6. The brick is embossed with the brick makers symbol "Fireback". With help from the Masonry Institute, we found that Fireback bricks were first manufactured in the area during the late 1920s. Thus, the brick could pre-date the Long Beach earthquake.

This possible age of the fill combined with the field relationships indicate that the ground surface was involved in faulting probably after the man-made debris was dumped on the ground surface. We believe that these data document historical surface faulting on Newport Mesa. The only historical earthquake large enough to have caused that surface faulting is the 1933 Long Beach earthquake with an epicentral location offshore from Newport Beach.

SEE PHOTO 4

Photo 4. Site 2 as it appeared before exploratory excavation. The base of the soil horizon (indication by arrows) is offset across the fault down to the west (left).

## CONCLUSIONS

Realizing the possibility that the Newport-Inglewood zone poses a threat to the Los Angeles and Orange County areas, geologists should devote more effort to evaluation of the surface and near-surface evidence of prehistoric earthquakes. This type of investigation would clarify the locations of fault traces along the Newport-Inglewood zone and it would help define the surface faulting potential. Although the zone is virtually in many geologists' backyards, few investigations of its surface-faulting history have been attempted in contrast to the many sophisticated investigations made along the San Andreas fault. In general, geologists have been deterred from surface investigations of the Newport-Inglewood zone because of the striking lack

of evidence for surface faulting and the heavy urbanization along its traces, making the zone particularly difficult to analyze.

#### TABLE 2 SITE TWO - NEWPORT MESA SOIL AND LITHOLOGIC DESCRIPTIONS

This study at Newport Mesa demonstrates that surface faulting has occurred and is recognizable along the Newport-Inglewood fault zone. However, the evidence of youthful faulting and surface faulting is subtle along the zone; discovery of such evidence requires particularly careful, detailed investigations.

#### SEE PHOTO 5

Photo 5. Site 2, exposure showing faulted terrace deposits and solum. Arrows indicate the main fault break.

#### SEE PHOTO 6

Photo 6. Site 2, close-up view of the brick found at the base of fill resting on laminated sand (indicated by arrows).

#### SEE FIGURE 4

Figure 4. Site 2, log of exposure showing relationship of fill and modern debris (D) to faulted solum. Arrows indicate main fault break.

#### REFERENCES

Barrows, A. G., 1974, A review of the geology and earthquake history of the Newport-Inglewood structural zone, southern California: California Division of Mines and Geology Special Report 114, p. 115.

Federal Emergency Management Agency, 1981, An assessment of the consequences and preparations for a catastrophic California earthquake: Findings and actions taken, Washington, D. C., 59 p.

Harding, T. P., 1973, Newport-Inglewood trend, California an example of wrench style deformation: American Association of Petroleum Geologists Bulletin, v. 57, no. 1, p. 97-116.

Hart, E. W., 1980, Fault hazard zones in California: California Division of Mines and Geology Special Publication 42 Revised Edition, 37 p.

Hill, M. L., 1971, Newport-Inglewood zone and Mesozoic subduction, California: Geological Society of America Bulletin, v. 81, p. 2957, 1962.

- Hunter, A. L., and Allen, D. R., 1956, Recent developments in west Newport oil field: Summary of Operations, California Oil Fields: California Division of Oil and Gas, v. 42, no. 2, p. 11-18.
- Kresse, F. C., 1966, Baldwin Hills Reservoir failure of 1963, in Engineering Geology in Southern California, edited by R. Lung and R. Proctor: Association of Engineering Geologists Special Publication, p. 93-103.
- Lang, H. R., and Dreesen, R. W., 1975, Subsurface structure of the northwestern Los Angeles basin, in California Division of Oil and Gas Technical Papers, Report No. TP01, 33 p.
- Morton, P. K., Miller, R. V., and Evans, J. R., 1976, Environmental geology of Orange County, California: California Division of Mines and Geology Open File Report 79-8.
- Morton, P. K., Miller, R. V., 1973, Geologic Map of Orange County, California, in Geo-environmental Maps of Orange County. California: California Division of Mines and Geology Preliminary Report 15.
- Richter, C. F., 1970, Magnitude of the Inglewood, California earthquake of June 21, 1920: Seismological Society of America Bulletin, v. 60, p. 647-649.
- Segall, P., and Pollard, D. D., 1980, Mechanics of discontinuous faults: Journal of geophysical research, v. 85, no. B8, p. 4337-4350.
- Shakelton, N. J. and Opdyke, N. D., 1975, Oxygen-isotope and paleomagnetic stratigraphy of Pacific core v-28-239, late Pliocene to latest Pleistocene: Geological Society of America Memoir 145, p. 449-464.
- Sherburne, R. W., 1981, Seismology program: CALIFORNIA GEOLOGY: v. 34, no. 1, p. 3-6.
- U. S. Geological Survey, 1981, Scenarios of possible earthquake affecting major California population centers, with estimates of intensity and ground shaking: Open File Report 81-115, p. 36.
- Wehmiller, J. F., Lajoie, K. R., Kvenvolden, K. A., Peterson, E., Belknap, D. F., Kennedy, G. L., Addicott, W. O., Vedder, J. G., and Wright, R. W., 1977, Correlation and chronology of Pacific coast marine terrace deposits of continental United States by fossil amino acid stereochemistry-technique evaluation, relative ages, kinetic model ages and geologic implications: U. S. Geological Survey Open File Report 77-680, 106 p.
- Wilcox, R. E., Harding, T. P., and Seely, D. R., 1973, Basic wrench tectonics: American Association of Petroleum Geologists Bulletin. v. 57, no. 1, p. 97-116.
- Woodward-Clyde Consultants, 1979, Report of the evaluation of maximum earthquake and site ground motion parameters associated with the offshore zone of deformation, San Onofre Nuclear

Generating Station: Report prepared for Southern California Edison, Rosemead, California, on file at Mission Viejo Library.

Yeates, R. S., 1973, Newport-Inglewood fault zone, Los Angeles Basin, California: American Association of Petroleum Geologists Bulletin, v. 57, no. 1, p. 117-135.

### **Response 65-37**

This attachment was submitted in support of comments stated in Comment 65-14. As such, comments related to this attachment are addressed in Response 65-14.

### **Comment 65-38**

Attachment #B

[http://www.oceanparkgazette.org/2001/01nov/water\\_nov21.htm](http://www.oceanparkgazette.org/2001/01nov/water_nov21.htm)

-- Ocean Park Gazette --

Water, water everywhere and not a drop to ...  
City sued over Charnock water rights

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By Carolanne Sudderth  
Ocean Park Gazette

Nov. 21 - Like a specter out of “Chinatown” or the great Owens River Wars of the 19-aughts and -teens, water warriors are at it again. With cubic miles of Pacific Ocean a scant hundreds of feet from its shores, the City of Santa Monica is battling over water rights.

Southern California Water Company filed suit against Santa Monica in January, claiming that the city was helping itself to more than its fair share of the waters in the Charnock Basin.

The Charnock field is bounded by the Santa Monica Mountains on the north, the Overland Avenue Fault on the east, the Ballona Escarpment and Baldwin Hills on the south, and the Charnock fault on the west.

According to the court documents, Charnock aquifer has supplied water to both parties since the 1920s, both entities sinking wells, into the aquifer that acted like taps in a vast underground water keg.

Santa Monica began drawing water from the Charnock wells in 1924. SCWC began selling it to Culver City and other municipalities in 1929.



The two entities co-existed amicably and for over three-quarters of a century have never come close to depleting some 11,000 acre-feet of water.

In 1995, it was discovered contaminants alleged to have sourced from certain oil companies had made their way into the aquifer and the wells were abandoned.

Now, the City and the SCWC claim that their combined extractions may exceed the basin's 11,000 acre-foot capacity -- when and if drinkable conditions are restored.

A subsidiary of American States Water, one of the largest publicly traded utilities on the New York Stock Exchange, SCWC is asking for the establishment of a water management plan that would determine the safe operating yield of the Basin, and the appointment of a water master or equivalent managing entity.

They state that without a basin management plan, continued extractions may result in lowering the water levels, and the subsidence of the land beneath it. The intrusion of sea water (nature does abhor a vacuum) would further diminish both the quantity and the quality of the available water.

Santa Monica is asserting the right to take increased amounts of water to meet future demands as necessary.

The city claims that the SCWC forfeited rights to anything but the city's leftovers. It alleges that not only has the SCWC's use of the water "greatly declined" over the past 50 years, but that SCWC neglected to file the Cessation Notice that would have enabled it to preserve its claims when both companies turned to alternate water sources five years ago. In addition, the city claims that SCWC has not done its fair share in the clean up department while the city was initiating environmental clean-ups, legal and legislative remedies.

SCWC Attorney Rob Saperstein told the Gazette that the city had never approached SCWC about sharing costs. Nevertheless, he said, the SCWC believes that it has responded appropriately and aggressively to protect its rights.

"In the context of filing lawsuits, people are sometimes prone to make overstatements on involvement or lack of involvement. We have been all along on the same efforts the city has been involved in - to get regulatory agencies that have oversight over cleanup to take responsibility."

"Neither of us will be shut out of the basin," he said.

The suit, he said, has more to do with quantifying claims on a larger canvas - the one painted with "oils."

“Oil companies say that because they will be responsible for remuneration, they should have some say in valuing the resource,” Saperstein said.

Both companies have suits pending against a consortium of oil companies, including Shell and Exxon, regarding the contamination of the aquifer.

“Their interest is in keeping as much money in their pockets as possible, and they will argue anything to the extreme to make sure that they limit their financial responsibility for the pollution of this basin.”

City Attorney Joe Lawrence said little in response to the Gazette’s requests for comment, other than that the lawsuit would be settled within a few week

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**Response 65-38**

This attachment was submitted in support of comments stated in Comment 65-15. As such, comments related to this attachment are addressed in Response 65-15.

**Comment 65-39**

Attachment #C

<http://quake.wr.usgs.gov/research/deformation/modeling/papers/antarctic.html>

Did stress triggering cause the large off-fault aftershocks of the

25 March 1998 Mw=8.1 Antarctic plate earthquake?

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Abstract. The 1998 Antarctic plate earthquake produced clusters of aftershocks (Mw<sub>6.4</sub>) up to 80 km from the fault rupture and up to 100 km beyond the end of the rupture. Because the

mainshock occurred far from the nearest plate boundary and the nearest recorded earthquake, it is unusually isolated from the stress perturbations caused by other earthquakes, making it a good candidate for stress transfer analysis despite the absence of near-field observations. We thus tested five proposed source models for the main rupture. We find that for 4 of the 5 models, 64-93% of the off-fault aftershocks lie in regions brought closer to Coulomb failure by the main rupture, typically by 1-2 bars (0.1-0.2 MPa). The Antarctic plate event, together with the 1992 Mw=7.3 Landers and its Mw=6.5 Big Bear aftershock 40 km from the main fault, supply evidence that small stress changes can indeed trigger large earthquakes far from the main fault rupture.

## Introduction

The 25 March 1998 Mw=8.1 Antarctic plate earthquake is one of the largest oceanic strike-slip events ever recorded. In addition to its spectacular size, the earthquake has two unique characteristics that motivate our study. The first is that the mainshock occurred about 250 km from the nearest plate boundary (Fig. 1), and 100 km from the nearest earthquake (a Mw=5.6 event in 1981) recorded by the Harvard CMT and ISC catalogs since their inception in 1966 and 1976, respectively. The presumed left-lateral fault is also at a high angle to the left-lateral transform boundary (Fig. 1), suggesting that the stress driving the Antarctic plate fault is not a product of plate boundary motion. For these reasons, the site of the 1998 shock is likely to be unusually isolated from the stress transfer from large nearby earthquakes.

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Figures 1 and 2 .(View larger GIF of this figure, ~108 Kb) Figure 1: Map of the 1998 Antarctic plate mainshock and largest relocated aftershocks (mb>3.7). The rift-transform boundary of the Antarctic and Australian plates is visible in the northeast corner of the map. The rupture planes for the five tested models, in the positions given by their authors, are depicted by the bold lines. Figure 2: Slip functions for the rupture planes shown in Fig. 1, with the dip and rake indicated for each model. The width for all but the Antolik et al. model is set to 30 km.

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The other remarkable attribute of the Antarctic plate event is that its aftershocks are distributed over an extent of 350 km, with the largest Mw=6.4 event striking 100 km from of the mainshock and 80 km south of the inferred fault rupture (Fig. 1). Such large distant aftershocks or coupled mainshocks are not unknown. The 1812 Mw~7.5 Wrightwood, California, earthquake on the San Andreas fault was followed 13 days later by the Mw~7.1 Santa Barbara shock 200 km away; Deng and Sykes [1996] argued that the second shock was brought closer to Coulomb failure by the first. Most recently, the 1992 Mw =7.3 Landers earthquake was followed 3.5 hrs later by the Mw=6.5 Big Bear shock 40 km away. King et al. [1994] argued that the Big Bear shock was promoted by the stress changes associated with the Landers rupture. In many respects, the Antarctic plate event appears to be a larger version of the Landers-Big Bear sequence.

The absence of near-field observations of the Antarctic plate earthquake, however, adds uncertainty to any conclusions one can draw about the stress transfer. Although the earthquake is well studied using teleseismic waveforms, yielding source parameters, slip functions, and aftershock locations, there are 15-25 km uncertainties in the location of the fault rupture, and 5 km uncertainties in the location of the aftershocks with respect to the mainshock [Nettles et al., 1999; Antolik et al., 1998]. Thus, given its unique attributes tempered by its limitations, we seek to use the Antarctic plate event to learn whether distant large aftershocks can be triggered or promoted by the stress transferred from the main rupture. Here we find that the presence of the remote southern and western aftershocks can be explained by the calculated Coulomb failure stress increases.

### Methods and Assumptions

We calculate the static Coulomb failure stress change, which is expressed as  $D_{sf} = D_t - \mu D_n$ , where  $D_t$  is the shear stress change resolved on a given failure plane (reckoned positive in the direction of fault slip),  $D_n$  is the normal stress change (positive in compression) and  $\mu$  is the coefficient of friction. Positive values of the Coulomb stress change are interpreted to promote failure, negative values to inhibit failure. We compute stress changes in an elastic halfspace [Okada, 1992] with a shear modulus of  $3.2 \cdot 10^{10} \text{ Nm}^{-2}$  and a Poisson's ratio of 0.25. See King et al. [1994], Harris et al. [1995], and Harris [1998] for discussion about the method.

For the Antarctic plate earthquake, we consider source models of McGuire et al. [1998], Nettles et al. [1999], Henry and Das [1999], and Antolik et al. [1999]. The faults are shown in Fig. 1, and slip functions in Fig. 2. All models have been constrained by their authors to pass through the NEIC epicenter, which has a ~15-km location uncertainty, and all show a concentration of slip near the CMT epicenter (Figure 2). Nettles et al. [1999] found two main subevents separated by 125 km, the first subevent having twice the moment of the second, so we also consider the possibility that the second subevent was triggered by static stress transfer from the first, 60 sec later.

While the rupture length is determined in each source model by waveform inversion, the fault width (its down-dip dimension) is poorly constrained. The width is crucial to our study, however, because the fault length-to-width ratio controls the intensity of the stress-change lobes off the slipped fault. A long rupture relative to its width, such as the Great 1906 San Francisco earthquake, profoundly drops the stress athwart or off the fault, whereas a short fault produces intense off-fault lobes in which failure is promoted [King et al., 1994]. Here we set the fault width of all but the Antolik et al. [1999] model to 30 km, for the following reasons. The oceanic crust is 35-55 my old at the site of the Antarctic plate earthquake, [Müller et al., 1997]. Such an age yields a 27-38 km depth of the 700-800° isotherm [Parsons and Sclater, 1977], which Wiens and Stein [1983, 1984] found corresponds to the thickness of the seismogenic lithosphere. If, on the other hand, the fault width were less than 15-20 km, the slip would be unrealistically high for its moment. Wells and Coppersmith [1994], for example, report 11 m as the peak observed slip in  $M_w=8$  continental strike-slip events, whereas a width of 15 km would yield a mean slip of 25 m for the Antarctic event. We calculate the stress changes at a depth of 15 km, half the fault

width, although our sensitivity tests indicate that the stress patterns are largely unchanged at depths of 5-25 km.

To assess the spatial association between aftershocks and the calculated static stress changes, we use the locations of the five largest aftershocks from the Harvard CMT catalog, as well as the locations of 17  $m_b > 3.7$  aftershocks from Nettles et al. [1999] using JHD relocations with residuals less than 3.5 sec; and 31  $m_b > 3.9$  events from Antolik et al. [1999] using a 3D harmonic earth model. Since we are focused on the stress transfer to the site of off-fault shocks, we resolve the Coulomb stress changes on vertical, left-lateral faults striking  $275^\circ$ , the average strike of the left-lateral nodal plane of the mainshock and the five largest aftershocks (Fig. 1).

## Results

Calculated Coulomb stress changes are sensitive to the assumed friction coefficient. Friction controls the distribution of the Coulomb stress change off the fault. As  $m$  increases, the off-fault lobes grow in size and shift into the dilatant quadrants, where faults are unclamped. We have set  $m = 0.8$  because a high value of friction fits the aftershocks distribution best. Friction of 0.8 is consistent with laboratory experiments for dry rock samples [Byerlee, 1978]. In a stress-transfer study, Parsons et al. [1999] found that  $m \approx 0.8$  for faults that lacked significant cumulative slip, which is likely true for the Antarctic plate fault. In the presence of high fluid pressures or extensive fault gouge, however,  $m$  could be as low as 0.0-0.2, in which case the southern aftershocks could not be explained as a consequence of static stress transfer.

Simple models of the Antarctic plate earthquake are consistent with the off-fault shocks being brought closer to failure. McGuire et al. [1998] inverted for the first and second central moments of the moment-rate distribution in space and time, constrained by the Harvard CMT solution. We explored a range of locations for the source fault consistent with the 25 km uncertainty relative to the NEIC epicenter given by McGuire et al. When the fault is shifted 25 km to the east, 93% of the Nettles et al. aftershocks and 79% of the Antolik et al. aftershocks located  $\approx 20$  km from the rupture lie in regions brought closer to failure (Fig. 3a). Some 87-94% of the aftershocks lie in regions brought closer to failure by the first subevent of Nettles et al. [1999] (Fig. 3b). In addition, the rupture surface of the second subevent in Nettles et al. is brought 0.5-2.0 bars (0.05-0.20 MPa) closer to failure by rupture of the first subevent, (for this calculation, we resolved the stress changes on the  $270^\circ$  strike of the second subevent).

More detailed slip functions yield more diverse results, in which two models fit the aftershock distribution well, and one does not. When we consider both subevents of Nettles et al. [1999], 55-64% of the aftershocks lie in regions where stress is calculated to have increased (Fig. 3c). The 360-km-long variable slip model of Henry and Das [1999] produces the broadest stress shadow, although it displays western and southern off-fault zones similar to that of McGuire et al. [1998]. Some 53-67% of aftershocks lie in regions brought closer to failure; if the Henry and Das source is shifted 18 km to the east, within the 25-km location uncertainty, 76-85% of the aftershocks lie in regions brought closer to failure (Fig. 3d). Because of its more heterogeneous slip distribution (Fig. 2), the Antolik et al. [1999] model produces numerous off-fault lobes (Fig. 3e). In this model, faulting extends through the western aftershock cluster, and the southern

cluster lies in the stress shadow. Thus, none of the off-fault aftershocks lie in regions brought closer to failure, regardless of the nodal plane used to resolve the stress changes.

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Figure 3. (View larger GIF of this figure, ~265 Kb) Calculated static stress change for the five source models. The percentage of CMT and either Nettles et al. or Antolik et al. relocated aftershocks falling in regions of Coulomb stress increase is also shown. Only aftershocks more than 20 km from the model fault plane (outside of the white box) are counted; thus the total number of shocks differs for each model. The McGuire et al and Henry and Das models are shown shifted east by the amounts indicated.

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## Discussion and Conclusions

For all but the Antolik et al. model, 60-94% of the off-fault aftershocks lie in regions calculated to have been brought closer to failure. This percentage rises to 85-93% when two models are shifted 18-25 km eastward. Such a displacement is within the relative location error of the source models (Fig. 1). The aftershock-stress association is, however, predicated on the assignment of a 30-km fault width and the assumption of a high coefficient of friction, which we can not independently verify. We therefore evaluated the significance of the aftershock-stress correlations with the equal-tails test of the null hypothesis that the association is random, taking into account the degrees of freedom inherent in our modeling (setting the friction coefficient, width, and for some correlations, shifting the location of the source). In seven cases, the correlations are significant at the >99% confidence level; these include the McGuire et al. model when shifted 25 km east (Fig. 3a); the Nettles et al. first subevent (Fig. 3b), the Nettles et al. two-subevent model when shifted 18 km west; and the Henry and Das model when shifted 18 km east (Fig. 3d). All but one of these correlations is significant when using either the Nettles et al. or Antolik et al. aftershocks. Three correlations are significant at the >95% level [McGuire et al., unshifted; both subevents of Nettles et al., unshifted (Fig. 3c); Henry and Das, unshifted], and five are not significant (<95%). Thus, most of the tested Antarctic plate source models are consistent with off-fault and fault-end shocks being triggered by stress increases of more than 1-2-bars (0.1-0.2 MPa).

In contrast to the off-fault shocks, aftershocks along the source faults, or within 20 km of the model faults, are generally inconsistent with the areas of calculated Coulomb stress increase. This may be because the detailed pattern of slip is poorly resolved, and thus the stress changes close to the fault are unknown. Further, we calculated the stress changes on vertical, left-lateral planes striking 275°. If some of the aftershocks near the fault occur on secondary faults with different orientations, the calculated stress change would be different. Another feature common to all the models is that there are few aftershocks in the northern off-fault lobe or the eastern fault-end lobe (Fig. 3). We speculate that the secular stresses buildup at the transform plate boundary (Fig. 1) may inhibit failure to the northeast of the Antarctic plate shock.

In summary, the extraordinary distribution of aftershocks of the Antarctic plate event may indeed be a product of static stress transfer. The Antarctic plate and Landers-Big Bear sequences together suggest that the seismic hazard posed by large aftershocks off the main fault can be assessed by stress-transfer calculations. In both the California and Antarctic events, aftershocks struck in regions brought 1-2 bars (0.1-0.2 MPa), and the time lags between mainshock and the largest aftershocks are short, 9.0 and 3.5 hours, respectively. The implications of such large and distant aftershocks for great San Andreas ruptures are provocative: A great earthquake on the southern San Andreas fault might, for example, trigger a large aftershock on the urban Newport-Inglewood fault, potentially causing more damage than the mainshock.

**Acknowledgements.** We thank Meredith Nettles for encouraging us to undertake this study; M. Antolik, S. Das, G. Ekström, C. Henry, J. McGuire, M. Nettles, and T. Wallace, for generously allowing us to use their unpublished preliminary source models; and R. Harris and T. Parsons for thoughtful and incisive reviews of the manuscript. We are also grateful to Pacific Gas & Electric Co. for funding this research.

#### References

Antolik M., A. Kaverina, D. Dreger, and G. Ekström, Finite fault rupture models of the 25 March, 1998 (Mw=8.2) Balleny Sea earthquake, *EOS Trans., AGU, 1998 Fall Mtg.*, 79 (45), suppl., F662, 1998. [to be replaced by a ms. submitted to *Geophys. Res. Lett.*, 1999]. Byerlee, J.D., Friction of rocks, *Pure Applied Geophys.*, 116, 615-626, 1978.

Deng J., and L. R. Sykes, Triggering of 1812 Santa Barbara earthquake by a great San Andreas shock: Implications for future seismic hazards in southern California, *Geophys. Res. Lett.*, 23, 115-1158, 1996.

Harris, R. A., Introduction to special section: Stress triggers, shadows, and implications for seismic hazard, *J. Geophys. Res.*, 103, 24,347-24,358, 1998.

Harris, R. A., R. W. Simpson, and P. A. Reasenber, Influence of static stress changes on earthquake locations in southern California, *Nature*, 375, 221-224, 1995.

Henry C., and S. Das, Rupture history of the 25th March, 1998, Balleny Islands earthquake, *EOS Trans., AGU, 1998 Fall Mtg.*, 79 (45), suppl., F662, 1998 [to be replaced by a ms. submitted to *Geophys. Res. Lett.*, 1999].

King G. C. P., R. S. Stein, and J. Lin, Static stress changes and the triggering of earthquakes, *Bull. Seismol. Soc. Am.*, 84, 935-953, 1994.

Nettles M., T. C. Wallace, and S. Beck, The March 25, 1998 Antarctic plate earthquake, in press, *Geophys. Res. Lett.*, 1999.

Okada, Y., Internal deformation due to shear and tensile faults in a half space, *Bull. Seismol. Soc. Am.*, 82, 1018-1040, 1992.

McGuire, J. J., L. Zhao, and T. H. Jordan, GSDF inversion for higher moments of the stress glut rate tensor, EOS Trans., AGU, 1998 Fall Mtg., 79 (45), suppl., F658, 1998. [to be replaced by a ms. submitted to Geophys. Res. Lett., 1999].

Müller, R. D., W. R. Roest, J.-Y. Royer, L. M. Gagagan, and J. G. Sclater, Digital isochrons of the world's ocean floor, J. Geophys. Res., 102, 3211-3214, 1997.

Parsons, B., and J. G., An analysis of the variation of ocean floor bathymetry and heat flow with age, J. Geophys. Res., 82, 803-827, 1977.

Parsons, T., R. S. Stein, R. W. Simpson, and P. A. Reasenber, Stress sensitivity of fault seismicity: A comparison between limited-offset oblique and major strike-slip faults, J. Geophys. Res., in press, 1999.

Stein R. S., G. C. P. King, and J. Lin, Stress triggering of the 1994 M=6.7 Northridge, California, earthquake by its predecessors, Science, 265, 1432-1435, 1994.

Wells, D. L., and K. J. Coppersmith, New empirical relationships among magnitude, rupture length, rupture width, rupture area, and surface displacement, Bull. Seismol. Soc. Am., 84, 974-1002, 1994.

Wiens, D. A., and S. Stein, Age dependence of oceanic intraplate seismicity and implications for lithospheric evolution, J. Geophys. Res., 88, 6455-6468, 1983

Wiens, D. A., and S. Stein, Intraplate seismicity and stresses in young oceanic lithosphere, J. Geophys. Res., 89, 11,442-11,464, 1984.

### **Response 65-39**

This attachment was submitted in support of comments stated in Comment 65-20. As such, comments related to this attachment are addressed in Response 65-20.

### **Comment 65-40**

Attachment #D

(MI 3.0) CALTECH/USGS EARTHQUAKE MESSAGE

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To: quake-ail@jet.gps.caltech.edu  
 Subject: (MI 3.0) CALTECH/USGS EARTHQUAKE MESSAGE  
 From: Caltech/USGS TriNet <rtem@et.gps.caltech.edu>



Date: Tue, 1 Aug 2000 12:56:11 -0700 (PDT)  
Delivered-To: mailing list quake-all@eginfo.wr.usgs.gov  
Mailing-List: contact quake-all-help@eginfo.wr.usgs.gov, run by ezmlm

-----  
== PRELIMINARY EVENT REPORT ==

Southern California Seismic Network (TdNet) operated by Caltech and USGS

Version 1: This report supersedes any earlier reports about this event.  
This is a computer generated solution and has not yet been reviewed by a human.

Magnitude : 3.0 MI  
Time : 1 Aug 2400 12:53:18 PM PDT  
: 1 Aug 2000 19:53:18 UTC  
Coordinates: 33 deg. 56.82 min. N, 118 deg. 21.81 min. W  
Depth : 9.7 miles (15.5 km),  
Quality :Excellent  
Event ID : 9556921  
Location: 2 mi. NNW of Hawthorne, CA  
: 11 mi. SW of Los Angeles Civic Center, CA  
: 33 mi. S \_ of SOLEDAD (quarry)  
: 1 mi. SW of the Newport-Inglewood Fault Zone

More information is available on the Worldwide Web at: <http://www.trinet.org/scsn/scsn.html>

(Mi 3.3) CAL TECWUSGS EARTHQUAKE MESSAGE

-----  
To: quake-all@jet.gps.caltech.edu  
Subject: (MI 3.3) CALTECWUSGS EARTHQUAKE MESSAGE  
From: Caltech/USGS TriNet <rtem@jet.gps.caltech.edu>  
Date: Sat, 16 Sep 2000 06:27:52 -0700 (PDT)  
Delivered-To: mailing list quake-all a@eginfo.wr.usgs.gov>  
List-Help: <mailto:quake-all-help@eginfo.wr.usgs.gov>  
List-Subscribe: <mailto:quakeall-subscdbe@eginfio.wr.usgs.gov>  
List-Unsubscribe: <mailto:quake,Wf-unsubscribe@eginfo.wr.usgs.gov>  
Mailing-List: contact quake-all-help@eginfo.wr.usgs.gov, run by ezmlm  
Reply To: quake-all-owner@eginfb.gps.caltech.edu

== PRELIMINARY EVENT REPORT ==

Southern California Seismic Network (TdNet) operated by Caltech and USGS

Version 1: This report supersedes any earlier reports about this event.  
This is a computer generated solution and has not yet been reviewed by a human.

Magnitude : 3.3 MI  
 Time : 16 Sep 2000 06:24:41 AM PDT  
 : 16 Sep 2000 13:24:41 UTC  
 Coordinates :33 deg. 58.90 min. N, 118 deg. 25.00 min. W  
 Depth : 7.0 miles (11.2 km)  
 Quality : Excellent  
 Event ID : 9564425  
 Location: 1 mi. ENE of Marina del Rey, CA  
 : 12 mi. WSW of Los Angeles Civic Center, CA  
 : 31 mi. S of SOLEDAD (quarry)  
 : 3 mi. WSW of the Newport-Inglewood Fault Zone

More information is available on the Worldwide Web at: <http://twww.trinet.org/lscsn/scen.html>

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 Magnitude 4.2 near West Hollywood, CA  
 Sunday, September 9, 2001 at 4:59:17 PM (PDT)  
 Special Earthquake Report  
 Egill Hauksson and Kate Hutton, Caltech, Lucy Jones, USGS. See also TriNet.

A M4.2 ,earthquake occurred in West Hollywood California at 4:59 pm (local time) September 9, 2001. This earthquake was widely felt throughout the Los Angeles Basin and in parts of San Fernando Valley and was well recorded-by the CaltechUSGS TriNet. The focal depth of this earthquake was about 4 km, making the shaking most severe in the Hollywood basin. No significant damage has been reported. This is the largest earthquake to occur in the Los Angeles basin since the 1994 Mw6.7 Northridge earthquake and its aftershocks.

During the last two weeks a north-northwest trending cluster of seismicity preceded the M4.2 earthquake. This cluster crossed the epicentral area of the M4.2 extended from Inglewood in the south, to Northridge in the north. These quakes had magnitudes in the range from M1.3 to M2.0. This earthquake is located near the intersection of the Newport-Inglewood and Hollywood faults. The focal mechanism showed horizontal strike-slip motion on a north-northwest striking plane, suggesting that this event may be associated with the north end of the Newport4nglewood fault. The Los Angles basin has north-northwest trending strike-slip faults at shallow depth and east-vest trending thrust faults at depths greater than 6 to 8 miles. This earthquake differs from of the deep thrust faulting earthquake sequences recorded over the last two decades in the Los Angeles area such as 1987 M5.9 Whittier Narrows and 1994 M6,7 Northridge. The occurrence of this earthquake cluster suggest activation of the more shallow strike-slip regime of fault s in the Los Angeles basin, which has mostly remained dormant over the last decade.

The M4.2 has so far been followed by the following aftershocks:

MAG DATE

ylmld LOCAL-TIME

h:m:s LAT LON

deg deg

DEPTH

km LOCATION

1.8	2001/09/09 17:25:27	34.047N	118.391W	11.5	3 km (2 mi) ESE of Century City, CA
2.0	2001/09/09 17:06:22	34.084N	118.390W	6.3	1 km (1 mi) E of West Hollywood, CA
2.8	2001/09/09 17:01:01	34.078N	118.396W	3.1	1 km (1 mi) SSE of West Hollywood, CA
4.2	2001/09/09 16:59:17	34.075N	118.379W	3.7	2 km (1 mi) ESE of West Hollywood

Information about the earthquake and its location

Map showing location of the earthquake and nearby earthquakes

Updated hourly for six days after the earthquake. Includes this event and (up to) the first 6 days of aftershocks, if any

Shake Map

Preliminary map of shaking intensity based on measurements by seismic networks. Usually available within 5 minutes after the earthquake.

Did You Feel It?

Report shaking and damage at your location. You can also view a map displaying accumulated data from your report and others.

Waveforms

Waveform for this Event

Topographic Map for this Area

There will be a red X at the earthquake epicenter.

(Note: Takes you off this site.)

California Office of Emergency Services

(Note: Takes you off this site.)

As additional information becomes available, it will be posted here.

Version #1: This report supersedes any earlier reports of this event.

Southern California Seismic Network: a cooperative project of U.S. Geological Survey,  
Pasadena California  
Caltech Seismological Laboratory, Pasadena, California

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U.S. Department of the Interior  
Earthquake Hazards Program - Southern California  
URL <http://pasadena.wr.usgs.gov/eqinthenews/ci09703873/index.html>  
Maintained by: Lisa Wald  
Last modification: Thursday, 6-sep-01 12:14  
Contact: Webmaster  
[USGS Privacy Statement](#) | [Disclaimer](#)

**Response 65-40**

This attachment was submitted in support of comments stated in Comments 65-23 and 65-24. As such, comments related to this attachment are addressed in Responses 65-23 and 65-24.

**Comment 65-41**

Attachment #E

[http://pasadena.wr.usgs.gov/shake/ca/STORE/X12456384/ciim\\_stats\\_1.html](http://pasadena.wr.usgs.gov/shake/ca/STORE/X12456384/ciim_stats_1.html)

The screenshot shows the USGS Earthquake Hazards Program website. At the top is the USGS logo and the text "Earthquake Hazards Program" with a red seismic wave graphic. Below this is a navigation bar with tabs for different regions: California, Alaska, Hawaii, W. Mountain, Pacific NW, Northeast, Central US, Puerto Rico, and Outside US. Underneath are links for "View map", "Archives", "Unlisted quake", "Scientific background", "Disclaimer", "FAQ", "Comments", and "Region home". The main content area displays "Event 12456384" with links for "ZIP Map", "Additional Maps and Data", and "Did you feel it? Tell us!". Below this is a "Statistics" section with the following data:

<b>Statistics for event 12456384</b>	Total reports:	3521
27 miles SSE of Calexico, California	Number of zip codes:	304
Mag: 5.7	Maximum intensity:	V

At the bottom of the statistics section, there is a "Page:" label followed by a series of numbered links: 1, 2, 3, 4, 5, 6, 7.

<b>Community name</b>	<b>Zip code</b>	<b>Ave. dist. (km)</b>	<b>Ave. intensity</b>	<b>Reports</b>
PHOENIX (AZ)	85003	328.45	III	1
PHOENIX (AZ)	85004	329.20	II	1
PHOENIX (AZ)	85008	336.87	II	1
PHOENIX (AZ)	85012	331.62	II	1
PHOENIX (AZ)	85034	332.94	III	1
CIBOLA (AZ)	85328	159.96	III	2
PARKER (AZ)	85344	203.61	II	1
SOMERTON (AZ)	85350	63.20	III	2
YUMA (AZ)	85364	74.07	III	48
YUMA (AZ)	85365	83.67	III	31
YUMA (AZ)	85367	95.76	III	6
HEREFORD (AZ)	85615	491.74	II	1
LAS VEGAS (NV)	89101	427.88	II	1
LOS ANGELES (CA)	90007	335.16	I	1
LOS ANGELES (CA)	90010	339.48	II	1
LOS ANGELES (CA)	90012	333.98	II	7
LOS ANGELES (CA)	90013	332.87	III	1
LOS ANGELES (CA)	90021	331.72	I	1
LOS ANGELES (CA)	90025	348.73	II	1
LOS ANGELES (CA)	90032	330.37	II	2
LOS ANGELES (CA)	90034	344.19	II	1
LOS ANGELES (CA)	90036	342.79	III	5
LOS ANGELES (CA)	90040	322.58	II	4
LOS ANGELES (CA)	90041	336.19	I	1
LOS ANGELES (CA)	90045	339.79	II	4
LOS ANGELES (CA)	90047	332.54	II	1
LOS ANGELES (CA)	90048	344.68	II	1
LOS ANGELES (CA)	90056	339.94	II	1
LOS ANGELES (CA)	90064	346.49	I	1
LOS ANGELES (CA)	90066	344.70	III	1
LOS ANGELES (CA)	90067	346.95	III	2
WEST HOLLYWOOD (CA)	90069	346.67	I	1
LOS ANGELES (CA)	90071	334.43	II	4

LOS ANGELES (CA)	90089	334.90	I	1
BEVERLY HILLS (CA)	90211	344.99	II	1
CULVER CITY (CA)	90230	342.04	II	2
EL SEGUNDO (CA)	90245	337.76	II	7
MANHATTAN BEACH (CA)	90266	335.82	III	1
REDONDO BEACH (CA)	90278	332.77	II	3
MARINA DEL REY (CA)	90292	345.77	II	3
INGLEWOOD (CA)	90301	336.60	I	1
SANTA MONICA (CA)	90401	350.59	II	1
SANTA MONICA (CA)	90404	349.76	III	3
TORRANCE (CA)	90502	324.45	II	1
WHITTIER (CA)	90603	307.66	II	1
LA PALMA (CA)	90623	305.49	III	1
CYPRESS (CA)	90630	303.33	III	7
LA HABRA (CA)	90631	304.31	I	1
CERRITOS (CA)	90703	308.70	III	4
BELLFLOWER (CA)	90706	314.45	II	1

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[U.S. Department of the Interior, U.S. Geological Survey](#)

Community Internet Intensity Maps

<<http://pasadena.wr.usgs.gov/shake>>

Maintained by: CIIM working group

Last modified 9.19.2002

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### Response 65-41

This attachment was submitted in support of comments stated in Comment 65-27. As such, comments related to this attachment are addressed in Response 65-27.

### Comment 65-42

Attachment #F

[http://www.hbpd.org/nl\\_5-98.htm](http://www.hbpd.org/nl_5-98.htm)

### THE EARTHQUAKE THREAT TO HUNTINGTON BEACH

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By GLORRIA MORRISON

EMERGENCY SERVICES COORDINATOR

Picture this...It rained all winter long and throughout the spring, the ground is saturated, the water table is extremely high...and an EARTHQUAKE HITS. What do you have? Liquefaction! The City is located on an alluvial flood plain and, for the most part, has a high potential for shaking intensity and ground failure (liquefaction) damage. What exactly is the earthquake threat to Huntington Beach?

The San Andreas Fault

The San Andreas Fault is located approximately 70 miles east of the City. This fault is capable of producing earthquakes in the magnitude 8+ range. It has been scientifically determined that a major earthquake on this fault has occurred approximately every 145 years. The last major earthquake on the Southern San Andreas fault occurred in 1857 (141 years ago). The San Andreas is considered one of the most active faults in the world today.

The Newport-Inglewood Fault

The Newport-Inglewood fault is considered the second most active fault in California. It runs from the City of Inglewood through Huntington Beach and out into the Pacific Ocean in the Newport Beach area. This fault is capable of producing earthquakes in the range of 6.3 to 7.5 magnitude.

The 6.3 1933 Long Beach earthquake occurred on the Newport-Inglewood fault causing 120 deaths and severe damage. Unreinforced masonry buildings collapsed leaving people trapped beneath the rubble. Many schools collapsed.

A 1997 study by Lisa Grant, Assistant Professor of Environmental Science and Geology at Chapman University stated the earthquake epicenter was in the Huntington Beach area close to where the Orange County Sanitation District is currently located. Buildings were damaged in Huntington Beach, including Central School which was located on the site where Dwyer Middle School and Smith Elementary School are now located (Palm and 17th Streets). Central School had to be torn down and rebuilt. The only reason there wasn't more damage in the Huntington Beach area was its low population, much of the area was undeveloped.

I interviewed Professor Grant of Chapman University who stated the 1933 Long Beach earthquake is important to California because it motivated some of the first seismic safety legislation requiring buildings to be more earthquake resistant. Because of Central School and Compton Junior High School collapsing, the Field Act was passed requiring schools to be built to more stringent building codes. Professor Grant further stated that the Newport-Inglewood Fault Zone is one of the most active and potentially dangerous faults in California.

**Response 65-42**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-43**

Attachment #G

<http://www.gps.caltech.edu/~sieh/activities/kfwb-03.html>

Newport-Inglewood and Las Cienegas Faults

I'm Dr. Kerry Sieh, at Caltech and the Southern California Earthquake Center.

There are two big faults running beneath the Santa Monica freeway. But you can't see them from the freeway, even going 10 miles an hour in rush hour. That's because the Los Angeles River, through ages gone by, has buried them with sand and gravel as fast as they have uplifted the landscape.

The better-known of these faults is the Newport-Inglewood. It crosses the freeway between Robertson and La Cienega Blvds. To the south, the fault hits the Baldwin Hills right where La Cienega does. Toward the north, it runs toward Beverly Hills, just east of the two large triangular towers of Century City. They sit just west of a tall fault escarpment or cliff, buried by sediment.

The Newport-Inglewood fault moved in 1933, but only farther south, along the stretch between Newport Beach and Compton. That magnitude 6.3 earthquake -- the Long Beach earthquake -- led to stricter laws about the construction of new buildings, including schools -- laws that have already saved thousands of lives and billions and billions of dollars of property.

I'm Dr. Kerry Sieh with LA underground on KFWB news 98.

**Response 65-43**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-44**

Attachment #H

<http://erp-web.er.usgs.gov/reports/annsum/vol44/sc/02HQGR0013.htm>



## Non Technical Summary

We constructed digital 3D maps of faults beneath northern Santa Monica Bay. Mapped faults include the E-W Dume fault, a large buried fault beneath it, the Malibu Coast fault above it, and the young NW-SE surface San Pedro Basin fault. The Dume fault is probably directly connected to the Santa Monica fault and the combined system has predominantly left-horizontal slip in its ENE coastal segment. We model between 4 and 7 km of left slip in the last ~4 million years. The area of the Santa Monica-Dume fault suggests it is capable of an earthquake between 7.25 and 7.35 Magnitude.

Structure and kinematics along the thrust front of the Transverse Ranges: 3D digital mapping of active faults in Santa Monica Bay using reflection, well, and earthquake data: Collaborative research with University of California, Santa Barbara and Columbia University

USDI/USGS 02HQGR0013 (UCSB)

USDI/USGS 02HQGR0007 (Columbia)

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NEHRP Element: I Keywords: Regional Modeling, Reflection Seismology; Tectonic Structures, Fault Segmentation

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## INVESTIGATIONS UNDERTAKEN

We used industry seismic reflection and well data to construct digital structure-contour maps of faults and a deformed horizon beneath northern Santa Monica Bay. These maps include a principal strand of the Dume fault, a blind fault beneath it, and a deformed horizon within the Pliocene Repetto Formation. Mapped NW-SE surface faults include the San Pedro basin fault and the Malibu Coast fault. Graduate student Kris Broderick has been involved in the fault mapping and stratigraphic interpretation, and this work will comprise his UCSB Master's thesis.

## INTRODUCTION

Space geodesy shows about 8-12 mm/yr of N-S contraction across the western Transverse Ranges orogen, between the San Gabriel Mountains and Long Beach, or between the mountains north of Ventura basin and the average motion of several of the Channel Islands (Fig. 1 in Argus et al., 1999). Large reverse-slip earthquakes occurred both north and south of the Santa Monica Mountains (Fig. 1; e.g., USGS and SCEC, 1994; Gutenberg et al., 1932; Stierman and Ellsworth, 1973; Hauksson and Saldivar, 1986; Hauksson, 1990). There have also been large right-lateral earthquakes on NW-SE faults adjacent to Santa Monica Bay (Fig. 1; Wood, 1933; USGS and SCEC, 1994).

### Surface Faults

The Santa Monica Mountains are separated from Los Angeles and Santa Monica Basins by a system of surface faults. From east-to-west, the Raymond, Hollywood, and Santa Monica fault show evidence for post-Miocene and Holocene left-lateral slip (Wright, 1991; Dolan et al., 2000, Tsutsumi et al., 2001). The Santa Monica fault continues offshore at Potrero Canyon, where it has ~0.5 mm/yr north-side-up post-~120 ka reverse separation and an unknown left-lateral component (McGill, 1989; Dolan et al., 2000). Long-term left-lateral slip is constrained by the 15 km left offset of the N-S-orientated 8 Ma Tarzana Fan system (Wright, 1991; Redin, 1991). The Santa Monica fault splits into the coastal Malibu Coast fault and offshore Dume fault (Figs. 2, 3; Vedder et al., 1974; Nardin and Henyey, 1978; Junger and Wagner, 1977).

Figure 1: Faults, earthquakes, and locations. Lower hemisphere earthquake focal mechanisms from USGS and SCEC (1994). Mapping in onshore Ventura basin is from Hopps et al., 1995, and is on several subsurface horizons. Mapping in Los Angeles basin is from Wright (1991) and is on the base Repetto Formation. Offshore mapping is by Sorlien and others (2000), and is on Miocene horizons, except south and east of the Northern Channel Islands faults are mapped at the seafloor. Mapping in northern Santa Barbara Channel is by us and is projected upwards to near the sea floor. Mapping in Santa Monica Bay is from this project. Other mapping from Jennings (1994). Profiles A, B, C, and D are shown in Sorlien et al., manuscript in preparation for BSSA. CIT=zone of faults at tip of Channel Islands thrust, EPA=Elysian Park anticlinorium, NIF=Newport-Inglewood fault, PV=Palos Verdes, PVF=Palos Verdes fault, PD=Point Dume, SMF=Santa Monica fault. Dashed faults are blind.

The southern front of the E-W Transverse Range orogen interacts with NW-SE right-lateral faults that cut the Peninsular Ranges and California Continental Borderland. E-W segmentation along this front is expected to relate to this intersection. The Palos Verdes fault projects from Palos Verdes Peninsula into Santa Monica Bay (Fig. 1). A shallow paleoseismologic study of this fault on the south side of Palos Verdes Peninsula, at Long Beach Harbor, indicates 2.7-3.0

mm/yr of post-7.8-8 ka right-lateral slip (McNeilan et al, 1996); geomorphic analysis in the same general area indicates 2.5-3.8 mm/yr of post 120-80 ka right slip (Stephenson et al., 1995). A second NW-SE system of faults and folds, the San Pedro Basin fault zone, is mapped along the NE margin of deep Santa Monica bathymetric basin (Fig. 2; Junger and Wagner, 1977; Dartnell and Gardner, 1999; Fisher et al., 2001 and in revision for BSSA).

### The Shelf Projection and Santa Monica Mountains blind fault

The ranges, islands, and offshore banks of the wTR and Borderland have been interpreted as anticlinoria, and most of these anticlinoria are ascribed to thrust slip on blind faults (Davis and Namson, 1994; Davis et al., 1989; Shaw and Suppe, 1994, 1996; Seeber and Sorlien, 2000). The Santa Monica Mountains and the Shelf Projection are the two main anticlinoria in and adjacent to northern Santa Monica Bay (Fig. 2). The Shelf Projection anticlinorium, located immediately west of Manhattan Beach, is expressed by a prominent 15x10 km bathymetric high (Fig. 2, Nardin and Henyey, 1978). A blind fault that accounts for this structure would have similar dimensions and thus could generate an earthquake similar in size to the M6.7 Northridge quake. Although Nardin and Henyey (1978) suggested the fold was most active before 1 Ma, our preliminary interpretation suggests that post-60 ka strata cored at ODP site 1015 (Shipboard Scientific Party, 1997) are at least locally folded along its south edge.

Figure 2: Vertical view of structure, bathymetry, and topography in and around Santa Monica Bay. This image was captured from our 3D model in GOCAD. USGS multibeam bathymetry is shown east of Pt. Dume, and the lower Repetto horizon is shown as semi-transparent west of Pt. Dume. The Dume segment of the Santa Monica fault and the underlying Tuscan Red-Shelf Projection blind fault are shown as opaque in rainbow color scheme (0-6 km). Profiles B, C, D are shown in Sorlien et al. manuscript in preparation. Not all faults are shown. Earthquakes are seen dimly through semi-transparent layers as spheres and small dots; the small dots are selected preferred slip planes. The inset shows our representation of earthquake slip planes in 3D-view is straight down. The long straight edge is horizontal and the point is downdip. Thin lines with arrowheads give slip of the hanging-wall. The bottom slip plane is reverse and the other two are oblique-reverse left-lateral.

### Methods

We used three different overlapping grids of industry multichannel seismic reflection data, and a few profiles from two other data sets, and an additional 800 m x 2500 m grid of single channel sparker data to map structure and correlate stratigraphy through northern Santa Monica Bay. Stratigraphic control was provided by logs from several wells drilled in the hanging-wall of the Dume fault, including 2 with sonic logs, and by other wells in the footwall farther east. The well information was converted to travel time and then correlated through the grids of reflection data, and around the east and west plunge of the Dume fault into the footwall basin to the south. This correlation was supplemented by published information on seafloor outcrop (Vedder, 1990; Nardin and Henyey, 1978), and by stratigraphic and velocity information from coastal and offshore oil fields at Playa del Rey and Venice Beach (Cal Div. Oil and Gas, 1992).

Figure 3: Oblique view of Dume segment of Santa Monica fault, inclined 45 deg. down to the north. In the west the fault dips a little less than 45 deg, in the east it is close to 45 deg. Blue spheres are aftershocks to the 1973 Point Mugu earthquake from Stierman and Ellsworth (1976). Although the Dume segment projects near the aftershocks, so do the steeper Malibu Coast fault to the north, and the flatter Tuscan Red fault to the south.

## RESULTS

### Mapping and Map Restoration

We mapped a horizon within the lower part of the Repetto Formation (Fig. 2). The unconformable base of Repetto Siltstone is between 4.42 +/- 0.57 m.y. and 3.4 +/- 0.3 m.y. (Blake, 1991), with the lower part missing where it onlaps growing folds. Because this horizon locally onlaps structure beneath, its age probably falls within the range for the base Repetto unconformity, or about 4 Ma. Reflections just below this horizon are parallel to it in both the hanging-wall and footwall of the Dume segment, indicating little seafloor relief at the time of deposition.

We used unfolding and map restoration to quantify strain due to faulting and folding of the ~4 Ma horizon. UNFOLD organizes grid points of the digital maps into adjoining triangles, lays each triangle flat, and then minimizes gaps and overlaps between triangles in an iterative process (Gratier et al, 1991, 1999). The flattened maps of each fault block are then manually fit together using a graphics software. Comparison between the restored and present state defines the finite displacement field with respect to a fixed reference line (Fig. 4). The details of the computer program UNFOLD and the technique of map restoration have been published (Gratier et al., 1991, 1999).

### Interpretations

The overall strike of the offshore Santa Monica-Dume fault system is east-west, but it is arcuate, being north-concave between Pt. Mugu and Pt. Dume, and being north-convex west of Point Mugu. It can be divided into three segments based on strike: 1) the ENE-striking Santa Monica segment between Pt. Dume and its onshore intersection with the Newport-Inglewood trend; 2) the WNW-striking Dume segment; and 3) the partially blind set of NE-SW faults beneath the Hueneme submarine fan (Fig. 5). The Dume segment may link westward to the Malibu Coast fault via distributed high-angle strands with small vertical separation (tens of meters or less). We extended the structure contour map of the Dume segment an additional 10 km east as a fault trace map (Figs. 2, 5). The mapped Dume segment steps right about 1 km, not left, to the Santa Monica segment in the area southeast of Pt Dume (Fig. 2). The dominant N-dipping strand at C-C' (located on Fig. 2) aligns with the onshore Santa Monica fault at Potrero Canyon (also Vedder et al., 1974; and Nardin and Henyey, 1978). It cuts across an E-W elongate anticline that extends between Pt. Dume and Venice Beach.

Figure 4: Preferred map restoration. The labeled dashed gray line is the coastline in its present position. The arrows connect the restored positions of corners of blocks to their present positions

and represent finite displacement with respect to the reference line. Overlap of restored blocks at “X” suggests we overestimated contraction there, and gaps at “Y” suggest we underestimated contraction there. The deformed state of this map is shown in Figure 2, and faults are labeled there. Displacement across the Santa Monica-Dume fault (through X and Y) is 7 km in the east and 4 km in the west; the variation is related to clockwise rotation in the east and counterclockwise rotation in the west.

The Dume segment dips moderately (40-50 deg) north in its upper 4-6 km (Fig. 3). The Malibu Coast fault strikes WSW in the offshore area south and west of Point Mugu, cutting the hanging-wall of the Dume fault. It is vertical above the Miocene volcanics (or equivalent) reflection. Within a few kilometers of A-A’ (located in Fig. 2) the Miocene volcanics reflector has about 400 m N-side-up separation across the Malibu Coast fault, and the lower Repetto Formation map horizon has about 200 m vertical separation across that fault. We trace the Malibu Coast fault directly to the Santa Cruz Island fault (Fig. 1).

South of and beneath the Dume fault, we interpret a blind, gently N-dipping fault that may be linked with or continuous with a NNE-dipping blind fault along the southern edge of the Shelf Projection anticlinorium (Fig. 2). Here, it is informally called the “Tuscan Red fault” after the color pencil we used to interpret it. The N-dipping segment of the fault preserves normal-separation in Miocene strata, and is interpreted as a Miocene low-angle normal fault. The Shelf Projection segment of the Tuscan Red fault has been thrust-reactivated and is responsible for the post-Miocene folding.

Like Fisher et al. (2001), we interpret that the Palos Verdes fault does not intersect the Santa Monica-Dume fault, at least in Pliocene or younger strata. We map it to either bend to the west-northwest as a minor fault or to terminate against minor WNW faults (Fig. 2). In contrast, two strands of the San Pedro basin fault zone do intersect the Santa Monica-Dume fault. We interpret the 10x15 km Shelf Projection anticlinorium, located in eastern Santa Monica Bay, to be a blind thrust-fold structure forming a restraining stepover between the Palos Verdes and San Pedro Basin faults. Co-located active thrust faulting is manifested by M5 earthquakes (1979, 1989; Fig. 1).

Figure 5: Simplified block model for Santa Monica Bay and vicinity. “A” shows the mapped fault pattern, dashed faults being blind, and the simplified block boundaries derived from that. “B” shows restored positions, roughly similar to the 4 Ma restoration in Figure 4. Positive numbers are amount of clockwise rotation and negative numbers are amount of counterclockwise rotation. Gaps represent shortening, and arrows represent displacement with respect to the fixed block. Variations of the simplified block model from the actual geometry, internal deformation of blocks, and the fact that thrust overlaps across faults are not included and unfolding was not done, all change the modeled contraction and displacements. But, large-scale patterns such as the relation of left slip on the Santa Monica-Dume fault to rotation of the Santa Monica Mountains are revealed.

## Deformation Models

Contraction across the Santa Monica-Dume fault varies depending on its strike: it is large across the WNW-striking segment and low across the eastern, ENE striking segment. These variations can be accounted for by uniform slip on the fault, provided the slip is nearly parallel to the eastern segment. Thus, predominantly left-lateral slip along the ENE-striking segment is responsible for transpression in its WNW-striking section. Thus, the WNW-striking Dume segment is a restraining segment in the Santa Monica fault. Similarly, there is little structural relief across the subvertical ENE-striking part of the Malibu Coast fault across Hueneme Fan, while its E-W segment along the Malibu Coast of the Santa Monica Mountains displays a north dip and subvertical and overturned Monterey Formation (Dibblee and Ehrenspeck, 1993).

These qualitative kinematic interpretations were tested and quantified using a map restoration technique. Maps of fault-bounded pieces of the Pliocene horizon were restored to a horizontal state with UNFOLD. The flattened pieces were then assembled with respect to a southern reference line. Vertical-axis rotation is allowed along with limited internal deformation of blocks. The trace of the Santa Monica-Dume fault (map view) is concave-north along ~40 km (Figs. 4, 5). If slip was pure left-lateral along this entire length, the Santa Monica Mountains block to the north would rotate clockwise relative to the Borderlands block to its south. In support of this model, paleomagnetic data indicate at least 75 deg of clockwise rotation of the Santa Monica Mountains since eruption of the middle Miocene Conejo Volcanics there (Kamerling and Luyendyk, 1979). GPS data indicate current clockwise rotation of the Santa Monica Mountains block at 7 +/-1 deg/m.y. (Donnellan et al., 1993). We thus restore deformation assuming a clockwise rotation in the hanging-wall block of the Santa Monica-Dume fault.

The Santa Monica-Dume fault has a greater left-lateral slip component adjacent to clockwise rotating blocks than adjacent to counter-clockwise rotating blocks. The restoration in Figure 4 shows about 7 km of left-lateral slip in the east and about 4 km in the west. About 0.5 km of the slip is absorbed in the west plunge of the Sycamore Knoll anticline and does not reach the Hueneme Fan area. Right-lateral slip on two strands of the San Pedro Basin fault is 1.9 km in this fitting, as opposed to zero in a fitting with no rotations (not shown).

#### Slip partitioning between right-lateral Borderlands faults and vertical axis block rotation

We constructed a simplified block model in order to examine the kinematics of block rotations and fault terminations beyond the area of our lower Repetto Formation mapping (Fig. 5). This block model incorporates our fault mapping as well as published fault mapping, but blocks are simplified to polygons. We qualitatively retrodeform this block model to investigate regional patterns of deformation (Fig. 5). Right-lateral slip is transferred between the Palos Verdes fault and the northern San Pedro Basin fault by contraction in the Shelf Projection restraining step. The block model includes clockwise rotation of Shelf Projection block and of the basin blocks between it and the Santa Monica Mountains. Part of the right-lateral slip on the Palos Verdes fault is dissipated into clockwise rotation and part is transferred to the northern San Pedro Basin fault.

#### Hazard from distributed faulting in rotating system

If the ~3 mm/yr of post-~8 ka right-lateral slip on the Palos Verdes fault (McNeilan et al., 1996) were absorbed by contraction across the Shelf Projection anticlinorium with no block rotation, the blind fault(s) beneath it would accumulate about 1 m of contraction (1.15 m of slip on 30 deg dipping fault) every ~330 years. The pattern of thrust loading would be different if blocks rotate. Our simplified block model includes 5 deg clockwise rotation of the Shelf Projection and of blocks to its north. A system of clockwise rotating elongate blocks includes left-lateral oblique slip between the blocks, and can include both extension and contraction where space problems manifest (Luyendyk, 1991). In such a system, you may have many faults active at lower slip rates. The hazard from such a system for damaging earthquakes is large because earthquakes will be common (as has been observed historically), but they will also be spatially distributed and the maximum Magnitude not as large. On the other hand, if right-lateral slip is transformed into clockwise rotation or distributed shear, the right-lateral system can end or become blind, and need not segment the Santa Monica-Dume fault. In this case, a large onshore-offshore rupture on the Santa Monica-Dume fault, although rare (e.g., Dolan et al., 2000), is probable.

#### Fault area and Maximum Magnitude

The only major segment boundary of the Santa Monica-Dume fault is 55 km west of Potrero Canyon, where the Dume fault segment becomes blind near the Hueneme segment. We suggest that intersections with the San Pedro Basin fault system near Point Dume and a <1 km right step in the shallow Santa Monica-Dume fault in that area need not stop a rupture. Thus, the Santa Monica-Dume fault is 65 km-long between the Hueneme segment and the left step at the West Beverly Hills lineament (aligned with Newport-Inglewood fault, Dolan et al., 2000). One caution is that we do not now have data that cross the fault in the 14 km west of the coast, and rely there on earlier mapping (Dolan et al., 2000; Nardin and Henyey, 1978, Osborne et al., 1980). We use a dip of 45 deg and a depth of 20 km to project Santa Monica fault beneath the Northridge hypocenter (as was done by Tsutsumi et al., 2001). The fault downdip width is 28 km and its area is 1840 sq km. Using the rupture area-Magnitude relation for California earthquakes of Dolan et al. (1995), the maximum Magnitude for the Santa Monica-Dume fault is 7.35. Using the rupture area-Magnitude relation of Wells and Coppersmith (1994) for global earthquakes results in a maximum Magnitude of 7.25.

We cannot model a late Quaternary blind thrust component of slip without more information on late Quaternary folding of the Santa Monica Mountains. We also choose not to calculate a maximum magnitude for the Tuscan Red fault because we do not know how much of it has been reactivated and remains active, and have only been able to map its uppermost part along the Shelf Projection anticlinorium. We did calculate above that if 3 mm/yr of Palos Verdes fault-right slip were absorbed by thrusting without block rotation, a Northridge-sized earthquake would occur every 330 years. Alternatively, smaller, much more frequent earthquakes are associated with distributed deformation.

#### Data efforts, sound levels, and siting USGS reflection profiles

We also have been working on three related projects. The first is working with Chevron-Texaco and with SCEC to find a way to preserve and make public their offshore west coast seismic reflection data. The second is working with Mike Fisher and Bill Normark of USGS to carefully site profiles for their June 2002 field program. The third was investigating sound levels and permitting to acquire seismic reflection data and multibeam bathymetry in a cruise of opportunity. This was time-consuming for one of us (C.C.S.), and data acquisition in that area will not occur because of equipment problems (the cruise was always intended as a test of equipment). However, the investigations on sound levels and permitting are not wasted as we have submitted proposals to use acoustic sources in the California Borderland.

## Conclusions

The Santa Monica and Dume faults are part of the same fault system, and are probably directly connected. The interval between the mapped Pliocene horizon and the top Miocene volcanics is thicker on the upthrown hanging-wall side of both onshore and offshore segments of the fault, which is consistent with basin inversion. The folding along the Dume segment initiated during the Pliocene Repettian Stage and accelerated towards the end of this stage. Left-lateral slip on the ENE-striking Santa Monica segment resulting in contraction across the offshore Dume restraining segment. Incorporating reasonable rates of clockwise rotation of the Santa Monica Mountains, in a map restoration results in an estimate of 4-7 km of left slip on the Santa Monica-Dume fault system and 1.8 km of right slip on the San Pedro Basin fault zone in the last ~4 m.y.. Alternatively, but less probably, a restoration with no vertical axis rotation and no distortion of fault blocks produces an estimate of 3 km of left slip, and no right slip on the San Pedro Basin fault zone. The Palos Verdes fault does not have any obvious affect on the continuity of the Santa Monica Dume fault, and the two systems do not intersect at or above the Pliocene map horizon. Strands of the San Pedro Basin fault zone do intersect the Dume fault, but do not appear to offset it. There is, however, a <1 km right step and a small increase to the west in vertical separation across the Santa Monica-Dume fault in the general area of this intersection. Maximum magnitude for an earthquake on the Santa Monica-Dume fault is 7.35 based on a rupture area-Magnitude relationship for California. A blind fault that dips north beneath the Shelf Projection anticlinorium extends at least 50 km beneath Santa Monica Bay, and is a Miocene low-angle normal fault partially reactivated as a thrust fault.

## Acknowledgements

Jean-Pierre Gratier provided his software and assistance in its use. Drew Mayerson and others at the U.S. Minerals Management Service provided access to the Digicon data, Tom Wright's and David Okaya's efforts made the Exxon data available to SCEC researchers, other industry sources provided additional data. John Armbruster did the earthquake relocations. Work by Mike Fisher, Bill Normark, and others at USGS first noted the possibility that the northern Palos Verdes fault was inactive or not present, and the extreme youth of folding along the San Pedro Basin fault. Bruce Luyendyk is supervising Kris Broderick's thesis. Kris Broderick is assisting in all aspects of this project. Information on petroleum wells along the Los Angeles area coast was found in the repository at Long Beach State operated by Dan Francis. Funded by USGS-NEHRP contract 02HQ GR0013. Mapping in northwest Santa Monica Bay has been supported by SCEC.



**Response 65-44**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-45**

Attachment #I

<http://pubs.usgs.gov/of/1996/ofr-96-0263/hazmap1.htm>

USGS Response to an Urban Earthquake -- Northridge '94

Earthquake Hazards Assessment--  
Seismic-Hazards Maps for the Los Angeles Region

The preliminary map for the Los Angeles region illustrates that seismic hazards are manifestations of (1) strike-slip motion along the San Andreas, San Jacinto, and other faults; and (2) broad, north-south compression caused by the "Big Bend" in the San Andreas fault east and north of the Los Angeles area. This map shows high seismic hazards throughout most of southern California where probabilistic ground motions during a 50-year period generally exceed 30%g. Many heavily developed areas near Los Angeles have mapped ground motions that exceed 40%g, primarily due to the presence of the Newport-Inglewood and Palos Verdes faults. There are also substantial hazards associated with the confluence of the Sierra Madre and Raymond faults, which accommodate north-south compression (See p.18).

Higher values of hazards (greater than 60%g) occur along the San Andreas, San Jacinto, and Elsinore faults. These strike-slip faults have relatively high slip rates and recurrence times as short as 150 years for certain segments. High hazards occur where faults intersect or are adjacent to each other, because these locations are more likely to experience large ground motions from both of the adjacent faults. The area of highest seismic hazards (with a 10% probability of exceeding 100%g in a 50-year period) is near San Bernardino, which is adjacent to both the San Andreas and San Jacinto faults.

A prominent zone of higher hazards extends from south of Santa Barbara to the northern part of the San Fernando Valley and the bordering mountains. This is caused by a group of thrust faults with relatively high slip rates, exemplified by the Oak Ridge and San Cayetano faults. The new hazards map emphasizes the importance of blind thrust faults (similar to the fault that produced the Northridge earthquake) to the seismic hazards of the Los Angeles region.

How the Northridge Earthquake Affects Seismic Hazards Maps

The Northridge earthquake had two primary effects on seismic-hazards maps for California. First, it emphasized the importance of blind thrust faults to seismic hazards. Second, the high accelerations during the quake reinforced previous observations that earthquakes on thrust faults produce higher ground accelerations than those on strike-slip faults.

To evaluate the effects of blind thrust faults, USGS scientists produced two hazards maps for situations with and without four recently identified blind thrust faults. The blind thrusts considered were the Elysian Park thrust, the Compton-Alamitos thrust, the Santa Monica Mountains thrust, and the Santa Barbara Channel thrust (See p. 18). For these faults, they used two recurrence models that are weighted equally in the hazards calculation: (1) a characteristic fault-rupture model where the entire fault ruptures at some average recurrence rate, and (2) another model where there is a range of earthquake magnitudes occurring on each fault, with  $M = 6.5$  events being more frequent than larger events that rupture the entire fault. Each recurrence model was given a weight of 0.5 because of uncertainties about the seismic potential of the thrust faults, and the inferred dips of the thrusts were included when calculating site-source distances.

Including the blind thrust faults raises the probabilistic ground motions (a 10% probability of being exceeded in 50 years) by as much as 15%g for areas near the faults. There are also significant changes in the 40%g contour in the vicinity of the blind thrusts. For example, differences between the maps are seen for the area of central Los Angeles where probabilistic accelerations increase from 38%g to 45%g with inclusion of the blind thrust faults. There were similar increases in the area southwest of Northridge, and for Santa Cruz Island and parts of the Santa Barbara Channel.

The large ground motions recorded for the Northridge earthquake confirm that thrust faults can generate ground motions larger than those of strike-slip faults for earthquakes of similar magnitudes and site-source distances. USGS scientists have found that thrust-fault earthquakes produce peak accelerations near the source that are about 20%g-30%g higher than those of strike-slip earthquakes. These differences are directly reflected in the maps of probabilistic ground motions. As new ground-motion relations that include the Northridge data are developed, the effects of thrust faulting probably will become even more prominent on the maps.

#### Lessons Learned

Blind thrust faults, such as the one that produced the Northridge earthquake, increase the seismic hazards for the Los Angeles region. The very presence of these additional faults adds to the hazards, and thrust faults also tend to produce stronger ground motions than strike-slip faults.

#### Lessons Learned

Identifying and trenching secondary ground-deformation features potentially provides information on earthquake recurrence intervals. This new approach, in conjunction with additional studies on other surface faults, may be widely applicable in the Los Angeles basin as a basis for estimating the recurrence of damaging ground motion from earthquakes on blind thrust faults.

**Response 65-45**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-46**

Attachment #J

<http://erp-web.er.usgs.gov/reports/annsum/vol37/sc/g2440.htm>

Analysis of Earthquake Data from the Greater Los Angeles Basin and Adjacent Offshore Area, Southern California

#1434-94-G-2440

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The study area includes the Los Angeles basin, the central Transverse Ranges and the eastern Ventura basin (Figure 1). At shallow depth the graded inversion VP velocity model images the shape of the Los Angeles and eastern Ventura basins. The Los Angeles basin extends to a depth of 8 km and is bracketed by the Newport-Inglewood fault on the west and by the Whittier fault on the east. The east Ventura basin, elongated in an east-west direction narrows with depth to 12 km. The much smaller San Fernando and San Gabriel basins are imaged to depths of 2 km. The north edge of the Peninsular Ranges, the Santa Monica, and the San Gabriel mountains, form high velocity ridges. In detail the Santa Monica mountains form two high velocity ridges, in the depth range from 0 to 10 km, separated by a zone of intermediate velocities, located north and west of the northern terminus of the Newport-Inglewood fault. Similarly, the velocity structure of the San Gabriel mountains exhibits complex geometrical relationships with the nearby lower velocity basins. At seismogenic depths of 16 km the hypocenters of moderate-sized and large earthquakes are located within or adjacent to high velocity bodies. The VP/VS model shows high VP/VS ratios beneath the east Ventura and the Los Angeles basins, extending to depths of 16 and 12 km, respectively. The high VP/VS beneath the basin sediments may indicate the presence of pore fluids or mafic intrusions. Such mafic bodies may be remnants of ophiolitic assemblages or mid Miocene volcanics.

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**Response 65-46**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-47**

Attachment #K

[http://www.relm.org/meetings\\_info/ms100600.html](http://www.relm.org/meetings_info/ms100600.html)

**SUMMARY OF 3D FAULT MEETING**

Written by Bill Foxall

USC, Oct. 6, 2000

**Meeting Participants**

Jim Dolan, USC  
Tom Rockwell, SDSU  
Ned Field, USGS  
John Shaw, Harvard  
Bill Foxall, LLNL  
Chris Sorlien, UCSB  
Marc Kamerling, UCSB  
Tom Wright  
Craig Nicholson, UCSB  
Bob Yeats, OSU

**Purpose**

The purpose of the meeting was plan and begin the process of characterizing 3D geometries of southern California faults and their uncertainties to meet the needs of the RELM project (<http://www.scec.org/research/RELM>) and the SCEC 2 proposal, and to form a basis for prioritizing future SCEC 2 research. Specific elements of this process addressed at the meeting were: (1) Critically evaluating proposed alternative 3D fault interpretations and their uncertainties, based on available observational data; (2) selecting an appropriate 3D visualization methodology for displaying and manipulating the 3D fault geometries; and (3) defining the form of a 3D fault data base.

I have marked action items as \*\* below and have suggested the people that should be responsible for carrying out each task. If you disagree with any of the assignments I've suggested for you, or

if you feel you would like to be included in other tasks, please let me know. You'll appreciate that these working sub-groups are vital to moving the process along.

A draft of this summary was sent to the meeting participants listed above for comment and correction. I received detailed comments from Chris Sorlien, Bob Yeats and Eldon Gath. A discussion of issues relating to the 3D fault data base by Craig Nicholson was also provided.

### 3D Fault Geometry Visualization and Data Base

John Shaw and Marc Kamerling showed impressive 3D views of fault surfaces under the northern Los Angeles Basin (LAB) and Ventura Basin (VB)/eastern Santa Barbara Channel (SBC), respectively, demonstrating that an adequate 3D visualization capability is already in place at UCSB and Harvard. Both groups use GOCAD software. Modeled fault surfaces include both data picks - such as mapped surface traces, well and reflection picks - and extrapolated and interpolated (x,y,z) points. Choice of interpolation and extrapolation methods needs to be carefully considered in the modeling approach. The data base must contain sufficient information to characterize the quality of the constraint, and hence the uncertainty, on each modeled fault surfaces. John briefly summarized how these attributes might be represented in 3D displays. Complete fault characterization includes uncertainty in the activity of the fault or, in the case of blind faults, whether it even exists, as well as uncertainty in geometry and slip rate. The hierarchy of constraints on fault definition can be ordered as follows:

1. Direct observations of mainshock/aftershock sequences (e.g., surface offsets, seismicity, source inversions) -> existence, activity, slip style and distribution, slip per event, 3D geometry.
2. Direct surface observations (e.g. trace mapping and trenching) -> existence, activity, slip style and rate, slip per event, trace length and geometry, near-surface dip.
3. Subsurface observations, including well picks, reflection picks and seismicity -> existence, activity, slip style, (slip rate), down-dip geometry.
4. Modeling results, such as balanced cross-sections and map restoration -> (existence, activity), slip style and rate, (geometry).

It was decided as a first cut to divide faults into two categories: (1) faults for which there is direct evidence for activity (i.e. from constraints 1-3); and (2) more speculative sources (based largely on constraints 3 and 4).

#### Category 1 LAB faults

Cucamonga  
San Jose  
Sierra Madre  
Raymond  
Santa Susana

Verdugo  
Northridge  
Hollywood  
Elsinore  
Santa Monica  
Whittier  
Chino  
Palos Verdes  
Puente Hills –Sa. Fe Springs seg./Carmenita(1)  
Newport-Inglewood San Gabriel  
Malibu Coast(3)

Category 2 LAB (+Borderland) faults

Compton-Los Alamitos  
Elysian Park thrust (Davis et al., Shaw & Suppe)  
Elysian Park fault (Oskin & Sieh)  
Las Cienagas  
Coyote thrust  
San Vicente  
Dume(2)  
Listric LAB/SM Mtns thrust  
Oceanside thrust  
San Joaquin Hills thrust  
(Fuis detachment)

Category 1 VB/SBC faults

San Cayetano  
Sisar-Lion Mtn.  
Padre Juan  
Oak Ridge – onshore  
Simi  
Red Mtn  
N. channel  
Santa Cruz Is(3)  
Santa Rosa Is.  
Holser

Category 2 VB/SBC (not complete):

Sulphur Mtn.  
Del Valle  
Channel Is. thrust  
Pitas point

Offshore Oak Ridge – Mid Channel  
(Novoa?)

Notes:

(1) Bob Yeats suggests that the western and eastern segments of the Shaw and Shearer Puente Hills thrust should be considered Category 2 sources, since only the central Santa Fe Springs segment is imaged directly.

(2) Bob suggests (10/24 email) that the Dume fault be considered Category 2, since he and Chris Goldfinger do not see a fault at the base of the continental slope in the seismic. I think Chris Sorlien does not dispute this. In Chris' view the Dume fault is very ill defined; west of Pt. Dume it is associated with a large fold scarp but its surface expression further west is subdued, and it is not clear whether east of Pt. Dume it can be connected with the Santa Monica fault at the coast. In Chris' new mapping the Dume and Anacapa are not the same fault; Chris has the Anacapa as a segment of the Malibu Coast-Santa Cruz Island fault (See Note (3)).

(3) It is unclear whether the Santa Cruz Island and Malibu Coast faults are continuous, or whether there is a left stepover between them (Bob Yeats). Based on seismic, Chris Sorlien favors the former (10/26 Sorlien email), while Bob Yeats favors the latter, based on a somewhat more restricted data set. Eldon Gath has solid evidence for the activity of the Malibu Coast fault, but suggests that the fault is complex and that mapping of the currently active fault is incorrect (10/26 Gath email).

Most of the LAB and VB/SBC faults (and additional faults) are already in the Harvard and UCSB 3D fault models/data bases, respectively.

\*\* Shaw has contacted Tom Jordan to discuss 3D fault modeling figures and text needed for the SCEC 2 proposal, and will work on these with Kamerling. The plan is to show 3D views of the LAB and VB/SBC Category 1 faults and then to show specific examples of alternative interpretations that include Category 2 faults. Optionally, fault models for all of southern California can be shown in map form. John has circulated a draft section for the SCEC 2 proposal.

A previous (Sep. 29) meeting had discussed coordination of the development of a USGS/SCEC fault data base for southern California (summary of that meeting). Ideally, the 3D fault characterizations discussed here should be integrated with that effort to create a single, unified data base. However, even though GOCAD can apparently interface with a rather broad range of data base formats, some concern was expressed that it might not be practicable to include all the information needed for 3D fault modeling within the format of the USGS/SCEC data base. For example, we would like to model the faults in the context of other 3D data sets, such as density and seismic velocity.

\*\* Field, Nicholson and Foxall will evaluate the feasibility of integrating the two data base efforts.

### Evaluation of 3D Fault Geometries

The meeting focused primarily on the LAB but also considered some VB/SBC faults.

#### Los Angeles Basin:

Much of the discussion of faulting within the LAB was facilitated by reference to a large-scale N-S seismic transect through the Basin constructed by John Shaw, together with 3D views of interpreted blind thrust/reverse faults under the northern Basin. John supplied notes on the transect, which also provide a good summary of the current state of knowledge regarding LAB faulting discussed at the meeting. The main points are highlighted here.

There is general agreement among the groups working in the northern LAB that active folding there formerly attributed by Davis et al. (JGR, 1989) and Shaw and Suppe (JGR, 1996) to the regional-scale, NW-striking Elysian Park thrust ramp is actually driven by a series of shallower, W-striking blind thrust/reverse faults, some of which are considered to be sources of significant earthquake hazard. Therefore, there is little or no evidence to support present slip on the Elysian Park thrust ramp. Geomorphic evidence also suggests that the ramp (and the Santa Monica Mountains thrust to the west) is either inactive or slipping at a very slow rate.

In the integrated interpretation of Shaw and Suppe, the Elysian Park ramp is connected to the NE-dipping Compton-Los Alamitos thrust ramp (CLAT) to the SW by a décollement under the central Basin. Karl Mueller and others have suggested that the CLAT has been inactive since at least ~18ka (at least at its SE end) based on cone penetrometer data. This, according to the décollement model, would also imply that the Elysian Park ramp is inactive. The reverse argument - that lack of evidence in the northern Basin for activity on the Elysian Park ramp implies that the CLAT is inactive - can also be made. However, Shaw and Suppe also proposed an alternative, equally viable interpretation for the CLAT in which the CLAT is the upper ramp of a northward-propagating thrust wedge, with no linkage to the Elysian Park ramp. In this interpretation, the question of the inactivity of the CLAT rest solely on the cone penetrometer data, which John suggests are not entirely conclusive. In addition, the activity of the northwestern end of the CLAT has not been addressed.

\*\* Mueller, Shaw, Rockwell evaluate the constraint on CLAT activity provided by the cone penetrometer and seismic data, and summarize conclusions.

If, based on the above, there remains some likelihood (even relatively low) that the CLAT can be considered active, then the implications of it cross-cutting the Newport-Inglewood fault within the seismogenic crust need to be addressed, and specifically the mechanical viability of a vertically segmented fault capable of generating an earthquake at least as large as the 1933 M6.3



event. A preliminary sensitivity study in 1997 suggested that the hazard in the LA area is particularly sensitive to segmentation of the Newport-Inglewood fault.

\*\* Shaw define alternative fault cross-cutting geometries as part of the 3D fault modeling effort. Foxall investigate rupture mechanics implications and viability.

We did not deal with Borderland faults. In addition to being potentially significant sources, the 3D geometry of some of these faults (San Joaquin, Oceanside thrusts) have important implications for the offshore Newport-Inglewood and Palos Verdes faults.

\*\* Legg, Shaw compile and integrate interpretations for the inner Borderland, with input from Mueller, Rockwell, Sorlien. Shaw define alternative fault cross-cutting geometries as part of the 3D fault modeling effort. Foxall can coordinate this effort.

Major differences remain in interpretation of the geometry and style of the Palos Verdes fault at depth. John Shaw favors a vertical near-surface fault shallowing to about 45° dip at depth, with oblique slip on the deeper plane partitioned to essentially pure strike-slip on the shallow Palos Verdes and dip-slip on separate reverse/thrust faults. Tom Rockwell favors a ~vertical Palos Verdes fault through the seismogenic thickness, and admits the possibility of separate thrust faults. We need to evaluate the relative viability of these alternative interpretations and their implications for faulting under San Pedro Bay and in the inner Borderland to the SW (See above).

\*\* Interpretation of the southern end of the LAB transect and other marine seismic data is part of Shaw's ongoing research. Input from Rockwell, Mueller, Legg, Sorlien.

A very preliminary interpretation by Bob Yeats and Chris Goldfinger of results from the mid-Oct., 2000 OSU cruise suggests that the Palos Verdes fault horsetails northwards under Santa Monica Bay into two thrusts near Redondo and Santa Monica Canyons, respectively, and does not continue to the north to intersect the Dume-Anacapa fault. They tentatively suggest the 3 mm/y slip rate can be consumed by thrusting.

Based on apparent progressive tilting of Quaternary strata above the Quaternary-Pliocene fold along the Compton-Los Alamitos trend, Chris Sorlien put forward his listric model for active blind thrusting under the LAB. This listric fault is the eastern end of the mega-fault proposed by Seeber and Sorlien (GSA Bull., 2000) to underlay the entire length of the Santa Monica Mtns.-Channel Islands anticlinorium. The activity of this listric fault under the LAB would not be precluded by Mueller et al.'s cone penetrometer results. Chris also showed preliminary results of Nano Seeber's analysis of seismicity (LA Seismic Zone), which Nano tentatively interprets as defining a shallow-dipping fault surface under the LAB. Chris suggests that the surface defined by the seismicity may be continuous with a fault plane reflection from the Santa Monica Mtns. section of the mega-thrust interpreted on a seismic line SW of Pt. Dume.

\*\* Sorlien and Seeber construct a listric thrust model for the LAB (and Santa Monica Mtns?) that integrates the onshore and offshore seismic with seismicity data. Chris, working with Marc

Kamerling, is ready to interpret seismic lines east of Pt. Dume and contour the thrust surface. John Shaw should be able to provide input to this model, including bedding dips along the CLAT and possibly additional seismic data under Santa Monica Bay.

One important item we did not address during the meeting was how the above models relate to Fuis and Ryberg's interpretation of the LARSE 1 line (Tectonophysics, 1998; Geology, submitted, 2000), particularly with respect to their interpretation of a mid-crustal detachment under the northern margin of the Basin. They propose that this detachment terminates as Shaw and Shearer's Puente Hills fault, which has implications for the down-dip geometry of the Sierra Madre and Whittier faults.

\*\* Foxall will discuss the LARSE model with Gary Fuis, and integrate it with alternative LAB fault models. Tom Wright could provide a regional perspective to guide this effort, together with Yeats, Dolan and Rockwell .

Ventura Basin and Santa Barbara Channel:

There appears to be more or less agreement on the existence of a N-dipping Channel Islands thrust under the SBC, although Shaw and Suppe (JGR, 1994) and Seeber and Sorlien (GSA Bull., 2000) proposed this structure based on markedly different data interpretations. Bob Yeats does not subscribe to this, however (See Yeats' 10/24 email). The slip rates estimated for the two models are similar, in the range 1.3-2.6 mm/yr. Shaw and Suppe's average rate is since ~3Ma. The Seeber and Sorlien rate is a tentative estimate since ~400ka for central-west Santa Cruz Island; the rate seems to die off rapidly to the east.

\*\* Sorlien produce schematic contoured surface (or map and cross-sections) of the Seeber and Sorlien listric thrust under the SBC and extend the interpretation east to link with the interpretation under Santa Monica Bay and LAB. Compare this interpretation with Shaw and Suppe (1994).

It is not clear how the south-vergent Channel Islands thrust relates to the north-vergent offshore Oak Ridge fault of Huftile and Yeats (1996) and the UCSB group (e.g., Sorlien et al., GSA Bull., 2000; Sorlien and Kamerling, NEHRP reports, 1998, 2000). It seems that some convergence between the Shaw and Suppe (and Novoa?) and UCSB interpretations of the offshore Oak Ridge-Mid Channel/Blue Bottle structures is possible. Characterization of the onshore Oak Ridge fault by Bob Yeats' group (e.g. Yeats et al., 1988) appears to be generally accepted. However, there are significant differences between their interpretation and that of Sorlien et al (2000) and Sorlien and Kamerling, 19998, 2000) regarding the left-lateral rate on the NE-striking segment of the fault near the coast, in the mechanism and amount of slip transfer offshore, and in the activity of the shallow portion of the offshore fault.

\*\* Kamerling, Sorlien, Nicholson and Yeats define and evaluate differences between onshore-offshore Oak Ridge fault interpretations, and work on a unified interpretation. Shaw work with this group to define areas of agreement and remaining disagreement in interpretations of

structures along the offshore Oak Ridge-Mid Channel/Blue Bottle trend, and examine relationship of these structures to the Channel Islands thrust.

### **Response 65-47**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

### **Comment 65-48**

Attachment #L

[http://www.usgs.gov/public/press/public\\_affairs/press\\_releases/pr1823m.html](http://www.usgs.gov/public/press/public_affairs/press_releases/pr1823m.html)

News Release

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**Capturing the ‘Big One’: Computer Modeling of Interacting Faults Near Los Angeles**  
The San Andreas and neighboring faults near Los Angeles interact in surprising, and, in some cases, potentially dangerous ways, according to an article by U.S. Geological Survey scientists to be published in the Dec. 12, 2003, issue of the journal Science. The researchers reviewed lessons from past earthquakes and combined that with powerful computer modeling to reach their conclusions.

Previous research has shown that faults like those in southern California interact over a variety of time scales, from sequences of large earthquakes over many years to cascading ruptures during a single big event.

Greg Anderson, the USGS scientist who is the lead author on the paper, noted that the 2002 magnitude 7.9 Denali Fault, Alaska, earthquake was just such a cascading rupture. As described in an earlier Science paper by Donna Eberhart-Phillips and colleagues, it began with a magnitude 7.2 earthquake on the Susitna Glacier fault, a previously unknown thrust fault, which immediately triggered magnitude 7.3 and 7.6 events on the strike-slip Denali fault. In turn, these set off smaller slip on the strike-slip Totschunda fault.

The densely populated Los Angeles metropolitan region is bounded by a large network of thrust and strike-slip faults similar to the Denali complex. The similarity between the Los Angeles faults and those involved in the 2002 Denali Fault event raises two questions that the authors addressed, said Anderson: Could large, complex earthquakes like the Denali Fault event happen on the edge of the Los Angeles metropolitan area? Or could these faults trigger each other more slowly, in a sequence of smaller, but still dangerous events?

In the current study, USGS authors Greg Anderson, Brad Aagaard, and Ken Hudnut addressed these questions by examining possible interactions between the San Andreas, San Jacinto, and Sierra Madre-Cucamonga fault systems. The Sierra Madre-Cucamonga thrust fault system lies along the base of the San Gabriel Mountains and may produce magnitude 7.5 earthquakes. To the east and north lie the large San Andreas and San Jacinto strike-slip fault systems, each capable of producing earthquakes larger than magnitude 7. In about 1685 and again in 1857, the San Andreas ruptured in magnitude 7.8 events.

The scientists created sophisticated three-dimensional computer models of the Los Angeles region, including the geometry of the faults in the area and the physics of earthquake slip. By combining these models with data from previous earthquakes, the authors were able to model realistic earthquakes on each fault and compute the immediate and long-term impacts those earthquakes may have on the other faults.

“We found that earthquakes on the Sierra Madre-Cucamonga thrust fault system are unlikely to immediately trigger earthquakes on either the San Andreas or San Jacinto faults, due to the geometry of the faults and the orientation of the stresses involved,” said Aagaard. “In other words, events like the Denali Fault earthquake, which started with a significant but relatively modest thrust fault earthquake and immediately grew into a much larger event on a strike-slip fault, are unlikely in the Los Angeles area.”

Anderson cautioned, however, that over the long term, slip on the Sierra Madre and Cucamonga faults may encourage slip on the San Andreas northeast of Los Angeles, by reducing the pressure squeezing the two sides of those faults together.

The authors also flipped the problem around, modeling the effects of large earthquakes on the San Jacinto and San Andreas faults, and found an unexpected result. Under certain very rare

circumstances, a large earthquake on the northern San Jacinto fault near Riverside and San Bernardino could trigger a cascading rupture of the Sierra Madre-Cucamonga fault system, potentially causing a magnitude 7.5-7.8 earthquake on the edge of the Los Angeles metropolitan region. The faults involved are close to the densely populated Los Angeles, Riverside, and San Bernardino areas, and the shaking and damage from such an event could possibly exceed even those of the ``Big One'' on the San Andreas fault.

While such an event is less likely than a similar sized event on the San Andreas, said Anderson, it is among the worst-case scenario earthquakes for southern California, and one that is not currently addressed in seismic hazard planning scenarios.

The goal of USGS earthquake research and monitoring is to save lives and ensure public safety. A total of 75 million Americans in 39 states are at risk from damaging earthquakes.

EDITORS: Animations highlighting some of the potential fault interactions are available from Science. They will also be available upon release of the embargo at:

<http://pasadena.wr.usgs.gov/office/baagaard/research/cucamonga/animations.html>

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 Contact: [catherine\\_puckett@usgs.gov](mailto:catherine_puckett@usgs.gov)  
 Last Modification: 12-9-2003@3:14pm(HF)

## **Response 65-48**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-49**

Attachment #M1

<http://www.agu.org/GRL/articles/2000GL011980/GL11141W01.html>  
<http://www.agu.org/GRL/articles/2000GL011980/GL11141W01.pdf>

[Only page 1 of this article is included as Attachment #M1.]

Tsunamis Within the Eastern Santa Barbara Channel  
 Jose C. Borrero, James F. Dolan, and Costas Emmanuel Synolakis  
 University of Southern California, Los Angeles CA, 90089-2531

**Abstract:**

Several locally generated tsunamis have been reported in Southern California during the past 200 years, yet the hazard from locally generated tsunamis has received considerably little attention. We consider here tsunamis generated by coseismic displacements on the Channel Islands Thrust (CIT) system, as well as waves generated by slope failures along the walls of the Santa Barbara Channel. We find that purely tectonic sources could generate regional tsunamis with ~ 2m runup, whereas combinations of tectonic sources and submarine mass movements could generate local runup as large as ~ 15m.

**Introduction**

Until the identification of the Cascadia subduction zone, the mitigation of locally generated tsunami hazards had received little attention, even for densely populated coastlines in the continental United States. Although historically tsunamis have caused enormous losses farfield, their long travel times allow for early warning. In contrast, locally generated tsunamis may have travel times as short as a few minutes. Furthermore, nearshore tsunamis may be enhanced by coseismic submarine mass failures. For example, the tsunami generated by the  $M^w \sim 8$  Manzanillo, Mexico earthquake of 1995, hit the coast within 15min of the earthquake [Borrero et al., 1995]; photos can be found at <http://www.usc.edu/dept/tsunamis>. Typical maximum runup values ranged from 2-4m--roughly as expected for the induced seafloor deformation. In contrast, the tsunami generated after the 1998  $M^w \sim 7.0$  Papua New Guinea earthquake produced runup in excess of 12m and caused major loss of life. [Kawata et al., 1999]. The cause of the extreme runup has been attributed to a large ( $4 \text{ km}^3$ ) slump along the continental margin of Papua New Guinea [Synolakis, in review].

These two and another ten tsunamis in the past decade struck nearby coastlines, but had little impact farfield, leading us to reassess the paradigm for tsunami hazards in southern California. McCulloch (1985) had earlier described the local hazard as 'moderate' with the potential for 2-4m runup heights. Following the 1992 Cape Mendocino earthquake, McCarthy et al. (1993) reassessed the risk to southern California from locally generated tsunamis as moderate to high. As Synolakis et al. (1997a) noted, these investigations were obtained without hydrodynamic modeling, using only earthquake magnitude-to-tsunami height relationships developed for Japan, which may not be appropriate for other tectonic settings. The region offshore Southern California

has numerous possible tsunamigenic hazards, including submarine faults and mass failures on unstable basin slopes [McCulloch, 1985, Vedder et al., 1986, McCulloch et al., 1989]. Computational tools now exist [Synolakis et al., 1997b] to allow quantitative modeling of the inundation potential from locally generated events. We present here results from modeling tsunamis that could be triggered from faulting and submarine mass movements within the Santa Barbara Channel.

### Regional Geologic Setting

Southern California lies astride a major transition between two tectonic provinces. The region to the south is dominated by northwest-trending, right-lateral strike-slip faults. The area to the north is characterized by west-trending mountain ranges--the Transverse Ranges--that have developed above west-trending reverse faults. Understanding of the thrust faults of the Transverse Ranges has increased dramatically over the past several decades, revealing the presence of several major reverse fault systems e.g. [Davis et al., 1989, Shaw and Suppe, 1994, Dolan et al., 1995].

The E-W Santa Barbara Channel forms the submerged western end of the Ventura basin [Vedder, et al., 1969]. It is ~ 130km long, extending from Point Conception in the west to the eastern end of Anacapa Island. The SB channel reaches a maximum depth of over 600m (fig. 1).

Several major active thrust fault systems, including the Channel Islands Thrust (CIT) of Shaw and Suppe (1994) lie offshore, beneath the Santa Barbara Channel. Potential coseismic deformation associated with this fault system represent a significant potential source for tsunami generation. Furthermore, the walls of the basin forming the channel are susceptible to submarine slope failures. At least two slope failures have been mapped in the central Santa Barbara Channel, one believed to have been seismically induced [Vedder et al., 1986, McCulloch et al., 1989, Edwards et al., 1993]. Recent studies reveal details of these two slope failures, additional failures along the northern wall of the channel, and several other possibly unstable regions [Greene and Maher, 2000].

### Historical Tsunamis and Earthquakes offshore Southern California

December 21, 1812 Santa Barbara. This one of the first reported large earthquakes in California appears to have generated a moderate-sized tsunami. The wave reportedly affected over 60km of the Santa Barbara coast [Topozada et al., 1981, Lander et al., 1993]. This  $M^w \sim 7.2$  earthquake caused extensive damage to the Spanish missions in the area. Historical sources report unusual ocean activity and high waves following the 12/21/1812 tremor [McCulloch, 1985]. Runup from this event is believed to have been as much as 4m at El Refugio, 40km west of Santa Barbara, and ~ 2m in Santa Barbara and Ventura. Contemporary eyewitness accounts report that “the sea receded and rose like a high mountain”, and “...it has been necessary for us to withdraw for now, more than half a league inland” [Topozada et al., 1981]. Other accounts from survivors describe

### Response 65-49

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-50**

Attachment #M2

[Only page 1 of this article is included as Attachment #M2.]

Reprinted from California and the World Ocean '97  
Proceedings of the Conference  
American Society of Civil Engineers  
Held March 24,-27,1997, San Diego, California

**EVALUATING THE TSUNAMI RISK IN CALIFORNIA**

Costas Emmanuel Synolakis<sup>1</sup>, Dick McCarthy<sup>2</sup>, Vasily V. Titov<sup>3</sup>, and Jose Borrero<sup>4</sup>

**Abstract**

We present existing pre-1985 predictions on the tsunami risk in California, and we evaluate them given the more recent field results and advances in computational methods. We find that the existing predictions quantitatively only account for farfield events, they don't consider the possibility of a CSZ event, they do not consider tsunami generation from nearshore strike-slip faults, and they use threshold computations which have been shown to substantially underpredict inundation. Using a field validated state-of-the-art methodology, we present preliminary results on current tsunami simulations in California, suggesting a method for addressing the problem of estimating the tsunami risk in the State.

**1. Introduction**

Tidal waves or tsunamis are long water waves generated by impulsive geophysical events such as submarine earthquakes, coseismic coastal or submarine landslides, and volcanoes. In the deep ocean, tidal waves may travel at speeds up to 500mph, and they can propagate rapidly across the world oceans and strike distant shorelines.

Up until 1992, the tsunami hazard in California was primarily attributed to teletsunamis, i.e., to tidal waves generated farfield; pre-1985 hazard predictions had only identified an overall small risk, subject to disclaimers. As a result, most of the tsunami risk reduction in the US concentrated to mitigating the hazard in Hawaii and Alaska. The Cape Mendocino tsunami triggered more comprehensive analyses of historic events in California, and now the risk from locally generated (nearshore) tsunamis is believed to be high along the coast from Crescent City to Cape Mendocino moderate, south of the Cape to north of Monterey, high, south of Monterey to Palos Verdes, and moderate south of PV to San Diego (McCarthy et al, 1993).

In the period 1992-1996 and immediately following the Cape Mendocino event, eight large earthquakes, generated tsunamis with runup heights ranging from five to thirty meters around the Pacific; before these events, the last major tsunami of similar magnitude occurred in 1983. These events caused extensive inundation and claimed the lives of at least 2000 people. The post-event



surveys produced field data, at exactly the time when inundation codes had started breaking the computational barriers of the notoriously difficult shoreline calculation, and as seismological interface models started producing seafloor deformation contours instead of average deformations. Also, the surveys identified previously unrecognized generic land and seafloor features which greatly increase the inundation potential, as well as unidentified generation

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<sup>2</sup> Executive Director, Seismic Safety Commission, 1900 K Street, Sacramento, Calif. 95814.

<sup>3</sup> Research Scientist, NOAA-PMEL, Seattle, Washington.

<sup>4</sup> Research Assistant, University of Southern California, Los Angeles, California 90089-2531.

### **Response 65-50**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

### **Comment 65-51**

Attachment #N

[www.smmirror.com/Volume1/issue48/review\\_of\\_playa.html](http://www.smmirror.com/Volume1/issue48/review_of_playa.html)

Santa Monica Mirror: Review of Playa Vista Shows New Problems

... In a third party review prepared for the City of Los Angeles, Exploration Technologies (ETI) asserts that both the new fault and the Charnock fault that runs ...

[www.smmirror.com/Volume1/issue48/review\\_of\\_playa.html](http://www.smmirror.com/Volume1/issue48/review_of_playa.html) - 24k - Cached

Review of Playa Vista Shows New Problems

Carolanne Sudderth

Mirror staff writer

New research indicates that Playa Vista, south of Marina del Rey, straddles a heretofore undetected fault line which runs just east of Lincoln Blvd.

In a third party review prepared for the City of Los Angeles, Exploration Technologies (ETI) asserts that both the new fault and the Charnock fault that runs on the east side of the property

provide vertical conduits for thermogenic methane and its companions: butane, propane et al, and several other combustible and, often, toxic gases.

According to the report, “It is well known and accepted that hydrocarbon gases are expelled from the earth along active fault and fracture traces.”

Both the Lincoln and Charnock faults should be classified as “potentially active, low potential fault,” meaning neither of them has slipped in the recent past, however, the report states, “a future earthquake with an epicenter close to the site could potentially cause a rapid flux of very large volumes of thermogenic methane gas to the surface along the Lincoln Boulevard Fault plane.”

After the Sylmar quake, the incidence of methane in the Fairfax area dramatically increased, along with potentials for combustion and conflagration. The report cites another instance in which a well that was thought to be depleted began producing 20 barrels of oil per day as well as thousands of cubic feet of natural gas as a result of an earthquake.

Further confirmation of the presence of significant gas potential from this large anomaly was demonstrated by minor blowouts of gas that occurred during the drilling of the monitor wells.

When drilling on monitor well 211 reached the aquifer, water blew over 40 feet into the air, halting work for 24 hours while the well discharged. It subsequently collapsed on itself and had to be re-located and redrilled. Nearby, monitor well 207 and four other wells in the large elongated methane anomaly required venting “before safe handling could be assured.”

When finally sampled, the concentration of gas in 211 was 60%. The gas “anomalies” lie directly over faults and fissures.

The largest of these is roughly 1700’ long and from 200’ to 400’ wide. It runs under the site of the proposed Marina del Rey Middle School, parallels the Lincoln fault and probably finds its source in that same fissure. At its zenith, it produces methane at a concentration of 99.7%

The second largest gas “puddle” lies over the Charnock fissure. ETI recommended that these sites not be built on.

“The best approach is to leave these seepage areas open,” it wrote. “If they have to be used for construction, then one should build non-residential buildings within such areas.”

In the past, Playa Vista principals argued that the on-site methane was biogenic in origin. A 1993 study found that the site contained no active faults and, according to a press release, “documented prior research identified only one active fault under the site.”

In previous studies, the largest methane concentration found by CDM was 970 PPM. ETI’s soil gas maps show methane anomalies ranging upwards of 75% pure methane, and in one case, the methane was over 99% pure.

ETI tested 812 sites, drilling to a depth of four feet. Its report asserts that the presence of such methane homologs as ethane, propane, and normal-abutane) over the exact same distribution as the methane proves that a major portion of the methane is thermogenic; that is, generated by heat and pressure at depth . It is generally believed that biogenic processes do not generate these methane homologs.

The report discounts the local rumor that the seepage is coming from the Southern California Gas Company's Playa del Rey storage facility. Nevertheless, the amount of naturally pressurized gas waiting to swoop into any artificial vacuum may be limitless.

“It is not possible to calculate or even estimate the volumes of shallow natural gas beneath the site.”

It recommends vigilant and constant monitoring “ to predict the onset of significant gas seepage from depth that could from depth that could cause a loss of life or limb.”

Gas can be seen bubbling up in the Ballona Creek channel as well as in the underlying aquifer and ETI found greater than 70% concentrations of thermogenic gas.

ETI recommends a pump and treat methane stripper system wherein water is withdrawn, treated and re-injected, and that a monitoring well system be required to continuously measure methane gas concentrations on the 50 foot gravel aquifer.

ETI also suggests that the City of Los Angeles Methane Gas Code should be revised to provide conditions for mitigations based upon whether the methane gas is of a biogenic or thermogenic origin as thermogenic gas is often accompanied by additional combustible and/or toxic components.

Playa Vista declined to talk to the Mirror directly, but in a press release, vice-president David Herbst said, “This confirms what we have been saying all along Playa Vista is safe to build.”

The press release also cites Playa Vista's intent to review ETI's recommendations with the Los Angeles Department of Building and Safety and other city agencies, as well as the appropriate state agencies to determine the most prudent mitigation measures.

“As to this possible fault, near Lincoln Boulevard, previous EIR studies of the Playa Vista property certified by the City of Los Angeles have found that the potential for ground rupture is considered very low.

“In any case, the ETI report acknowledges that even if such a Lincoln Boulevard fault does exist, Playa Vista can still be safely built.”

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**Response 65-51**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**Comment 65-52**

Attachment #O

[Only beginning of report (through 1.1 Location) included as Attachment #O.]

<http://www.eti-geochemistry.com/Report-04-2000/#3.0> SITE CHARACTERIZATION

SUBSURFACE GEOCHEMICAL ASSESSMENT OF METHANE GAS OCCURRENCES

PLAYA VISTA DEVELOPMENT

First Phase Project

Los Angeles, California

Prepared for:

CITY OF LOS ANGELES

DEPARTMENT OF BUILDING AND SAFETY

April 17, 2000

Report Prepared by:

Exploration Technologies, Inc

3698 Westchase

Houston, Texas 77042

**EXECUTIVE SUMMARY**

Exploration Technologies, Inc. (ETI) was retained in May 1999 by the City of Los Angeles, Department of Building and Safety (LADBS), and Playa Capital to serve as Peer Reviewer regarding subsurface methane gas issues in the proposed Playa Vista Development in Los Angeles, California. In order to provide adequate methane data for evaluation, ETI designed and supervised the collection and analysis of two shallow soil vapor surveys consisting of 812 sites placed on a 100 foot staggered grid over the First Phase of the Playa Vista Development. The soil gas samples were collected by Scientific Geochemical Services in Casper, Wyoming and analyzed by Microseeps in Pittsburgh, Pennsylvania. Using the soil gas data as a guide, 32 monitor wells were installed by Camp, Dresser and McKee and sampled for their free and dissolved gases. Gas analysis for these samples were also conducted by Microseeps. Stable

carbon isotopes for the free gases in the ground water were analyzed by Isotech Labs in Champaign, Illinois.

This soil gas and ground water data have defined two main areas of methane gas seepage, one very large thermogenic gas anomaly (the soil gas expression is over 1700 feet in length and 200 feet wide) in Tract 01 and another, slightly smaller thermogenic gas anomaly (slightly smaller in size, but not in concentrations) in the southern part of Tract 02. Anomalous levels of ethane, propane and butanes are coincident with methane in both anomalies, inferring that the methane is related to deeper thermogenic sources. The free gases and the dissolved gas anomalies in the ground water within the 50-foot gravel aquifer are also directly related to the soil gas anomalies indicating a vertical migration pathway from deeper sources. Methane isotopes completes this investigation, confirming a common, thermogenic source for the gases measured within these two anomalous areas.

The source of the thermogenic gas observed at the Site is most likely derived from shallow natural gas sands within the Upper Pliocene Pico Formation, probably sourced from the gross interval from 510 feet to 3434 feet, encountered in the non-commercial wells surrounding the Site. There is a north-south linear trend (1700 feet long and 200 feet wide) of very large to intermediate methane concentrations defined by soil gas, dissolved gas, free gas and isotopes measured in the aquifer, which lies to the east and parallel to Lincoln Boulevard. This anomaly has been interpreted as migration of thermogenic gases from depth from a proposed subsurface fault, herein named the Lincoln Boulevard Fault.

The position and attitude of the proposed Lincoln Boulevard Fault is based upon a combination of subsurface geologic data, surface topographic lineations, and a north-south trend of anomalous geochemical data. With respect to seismicity, this fault should be considered as a potentially active low potential fault. Geochemically, this fault is an active pathway for vertical natural gas migration. The proposed Lincoln Boulevard Fault provides a permeable vertical pathway for the natural gases at depth to migrate to the near-surface and have the observed distribution and concentrations.

A future earthquake with an epicenter close to the site could potentially cause a rapid flux of very large volumes of thermogenic methane gas to the surface along the Lincoln Boulevard Fault plane. Because the geologic data from the surrounding wells is only of a general nature and of an early vintage, it is not possible to calculate, or even estimate, the volumes of shallow natural gas beneath the Site. Adequate well logs or other testing data is not available.

Present data indicate that the anomalous methane gas concentrations could extend to the north into Area C. Data from this assessment do not show any evidence that the source of thermogenic gas is from the gas storage facility.

Methane mitigation systems should be required for all buildings in the First Phase of the Playa Vista Development. The design of the methane mitigation systems should follow the same specifications as previously modified and approved for the Fountain Park Apartments in Tract 03.

Because of the very high methane concentrations in soil vapor in the Tract 01 and Tract 02 anomalies, and the future potential for an earthquake-induced flux of additional very large volumes of methane gas in these same anomalous areas, it is recommended that there be mitigation of the 50-foot gravel aquifer in these two areas. A monitor well system should be required to continuously measure methane gas concentrations in the 50-foot gravel aquifer.

A similar subsurface methane assessment should be conducted in the Tract 49104-04 and Tract 52092 areas of the remainder of the First Phase Playa Vista Development. Although the available data is too limited in scope for adequate evaluation, there is no question that a similar methane issue exists in these areas.

Although only leaking minor amounts of thermogenic gas, the Universal City Syndicate Vidor #1 well and the Cooperative Development Co. Community #1 well should be re-abandoned.

## 1.0 INTRODUCTION

Exploration Technologies, Inc. (ETI) was retained in May 1999 by the City of Los Angeles, Department of Building and Safety (LADBS), and Playa Capital to serve as Peer Reviewer of the previous attempts to characterize subsurface methane gas occurrences in the proposed Playa Vista Development in Los Angeles, California.

### 1.1 Location

The proposed Playa Vista Development (Site) is comprised of approximately 1,087 acres located approximately 15 miles west of downtown Los Angeles (Figure 1). Regionally, the site is four miles south of the City of Santa Monica, 0.5 miles west of the City of Culver City, and approximately 1.5 miles north of Los Angeles International Airport. The Playa Vista Development is bounded by Marina del Rey on the north, Culver City on the east, Playa del Rey and Weschester Bluffs on the south, and Vista del Mar and Playa del Rey on the west. Playa Vista will be an integrated, mixed-use, master-planned community composed of residential, commercial, recreational, and civic structures. Lincoln and Jefferson Boulevards are the major north-south and east-west traffic arteries, respectively, in the area.

### **Response 65-52**

This attachment was cited in Comment 65-35 as a non-mentioned, additional attachment. As such, the comment provides general support to Comments 65-1 through 65-34. As such, comments related to this attachment are addressed in Responses 65-1 through 65-34.

**LETTER NO. 66**

Cathy Carey  
5389 Playa Vista Drive, #434D  
Playa Vista, CA 90295

**Comment 66-1**

TO WHOM It may concern

I am a resident of the fountain park apartments and have resided on Jefferson Blvd. for over 13 years in the playa vista area. After experiencing the lack of integrity from these developers and the impact it has had on my health and the environment, I beg you to strongly oppose the phase II development.

Thank you and happy holidays

**Response 66- 1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 67**

David Chiappetta  
6202 Vista del Mar, #258  
Playa del Rey, CA 90293

12.19.2003

**Comment 67-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 67-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.



**LETTER NO. 68**

Uncle Darrow's, Inc.  
2560 South Lincoln Blvd., Suite 102  
Marina del Rey, California 90292

December 15, 2003

**Comment 68-1**

I have never written a letter like this before, but I think it is important for people to see Playa Vista firsthand and understand how incredible this project really is. Once people visit this new community, they will be hard pressed to oppose Playa Vista's second phase.

Forget the environmental improvements Playa Vista has made and disregard the energy conscious way in which the project was planned, this is simply is the kind of place everyone would like to live. It should be a model for new communities throughout Los Angeles and the nation.

While some developers skimp on landscaping, planting saplings and sod, Playa Vista has invested in mature trees, lush landscaping and broad roadways that have a real small-town charm.

Playa Vista might be just a bunch of documents and maps to many people in the city, but for those who have seen it firsthand, it is a tangible example of how every new community should be built. The Village is an extension of this plan, providing cafes and small shops to serve the neighborhood.

I encourage you to visit Playa Vista and I am sure you will have no doubt that The Village should move forward.

**Response 68- 1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 69**

Mike and Debbie Clint  
7555 W. 83rd Street  
Playa del Rey, CA 90293

December 17, 2003

**Comment 69-1**

I have reviewed the EIR for The Village at Playa Vista, and believe that the benefits far outweigh the minor unmitigated impacts this project will have on the area. Of particular interest to me are the street improvements and public transit additions that Playa Vista will make to the area.

Already, the Phase I improvements have helped create smoother traffic flow in an area whose roadways were neglected for decades. Also, as a long-term resident of the area, I am impressed with the positive impact Playa Vista is having.

The freshwater marsh, newly paved roads, transformation of an industrial property to a beautiful residential area with parks are just a few of the improvements that are helping my property value increase. It doesn't hurt to have Electronic Arts and its 1,000 well-paid employees move to the area either.

I support The Village and hope the City will too.

**Response 69- 1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 70**

Jonathan Coffin  
436 W. Regent Street  
Inglewood, CA 90301

**Comment 70-1**

What can possibly be the reason for going forward with plans for Playa Vista phase 2 mega-development right-plop-down in the middle of our last remaining and degraded open spaces like a bomb sending waves of negative pressure already affecting the quality of life to the surrounding communities. As a resident of the surrounding community in Inglewood I can tell you we already have more traffic than we can bare and I do not look forward to the extra pollution such a mega development will surely deliver. Lets look ahead instead by acquiring Area D from the private developers and returning them to the public trust where we can demonstrate the proper role as stewards of our natural habitats with a vision of ecological sanity. Lets preserve the Ballona Valley for all the future generations and not leave it for the private views of a few. I look forward to your timely response.

**Response 70-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 71**

Karen Comegys  
1725 Cedar Street  
Santa Monica, CA 90405

12/14/04

**Comment 71-1**

We would like to express my strong opposition to the Playa Vista Phase 2 Project.

**Response 71-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 71-2**

Los Angeles says that there will be no traffic impact on Santa Monica. In reality, the impact will primarily be on Santa Monica and that traffic will not impact Los Angeles!

Every day, Sunset Park is negatively affected by traffic going north and south to and from the 10 freeway to reach the encircling areas of Los Angeles.

**Response 71-2**

The traffic analysis presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, and Technical Appendix Volume 3 (Part 3 of 5) of Technical Appendix K of the Draft EIR determined that the Proposed Project would not have significant impacts at any of the 23 study intersections located within the City of Santa Monica under either the City of Los Angeles intersection analysis method and significance criteria or the City of Santa Monica intersection analysis method and significance criteria.

Further, as a result of the State's acquisition of Area A and portions of Area B and the passage of SB 666, the Playa Vista Drive bridge and road extension to Culver Boulevard will not be constructed and is no longer a part of the baseline conditions for the year 2010. As discussed in Subsections 3.1 and 5.1.5 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 828 and 931, respectively, the Traffic Report included an analysis of the Proposed Project's impacts under the no Playa Vista Drive bridge and road baseline. Under either baseline scenario (i.e., with or without the Playa Vista Drive bridge and road), the analysis of traffic

impacts within Santa Monica intersections is the same, and the Proposed Project would not result in any significant impacts at any intersections in Santa Monica. Please see Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472 for a further discussion.

Potential impacts from the Proposed Project on residential streets are addressed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 872. The Draft EIR concludes that the Proposed Project will not have a significant impact on the neighborhood streets in the Sunset Park area referenced in the comment. Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, which provides a more detailed discussion of the neighborhood traffic impact analysis.

### **Comment 71-3**

We must not allow our city to fall victim to Los Angeles' greed for land and development..

We should look to protecting these lands for wildlife and our children.

Santa Monica is a very special city and we look to you, as our Council members, to protect our quality of life.

Please do not support this project.

### **Response 71-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 72**

Terry Conner  
13210 Mindanao Way  
Marina del Rey, CA 90292

December 03 [2003]

**Comment 72-1**

The road system in the Playa Vista area has been severely degraded over the past five decades. As the area has continued to grow, the roads have become more and more worn down, causing safety problems and increased traffic congestion.

Playa Vista's improvements to the streets are already making a big impact. The Jefferson corridor is safer, smoother and has a beautiful median with birds of paradise plants. The Culver Loop and Widening project has made the area safer as well.

The transportation projects in The Village will complete an important system of transportation begun several years ago by Playa Vista. Without Playa Vista, these improvements would never have been made. As a local resident, I support these improvements, believe they are well thought-out, and I only wish the City would move more quickly to approve The Village so Playa Vista could get on with the business of finishing the roadway improvements.

**Response 72-1**

A number of improvements to the road system in the area surrounding the Proposed Project have been recently completed, are currently under construction, or are planned for construction in the future. Some of these improvements have been implemented by the adjacent First Phase Project at Playa Vista, such as widening of Jefferson Boulevard adjacent to the First Phase Project, widening of the Jefferson Boulevard/Lincoln Boulevard intersection, and improvements to the intersection of Jefferson Blvd. and Culver Blvd. In addition, a number of improvements are planned to be completed by Caltrans. These include a significant upgrade to Lincoln Boulevard and improvements to the Marina Freeway at Culver. These traffic improvements, including those associated with the Playa Vista First Phase Project, are incorporated in the 2010 baseline conditions presented on pg. 842 of the Draft EIR. Future anticipated traffic growth is projected by the model and presented as "2010 Base w/o Project" in Table 119 beginning on page 847 of the Draft EIR.

These comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 73**

Danna Cope  
8219 Reading Avenue  
Westchester, CA 90045

**Comment 73-1**

The EIR for the proposed Village at Playa Vista is incomplete and inadequate for the following reasons:

Traffic and air pollution that would be generated by the proposal are underestimated.

Current traffic and LOS of intersections are not adequately addressed.

The total area that would be impacted (North, South, and East of the project site) by the additional traffic is not included.

The mitigation measures for both traffic and air pollution are inadequate for the total impact the proposal would generate.

The existing infrastructure is not able to handle the real traffic and air pollution that would be generated.

Police and fire services would not be adequate to service a project of the proposed magnitude.

There must be full disclosure of all oilfield gases and all toxic issues at the site.

I look forward to your response to all the comments being made.

**Response 73-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation, on page 798; a detailed analysis of air pollution in Section IV.B, Air Quality, on page 270; a detailed analysis of police services in Section IV.L.(2), Police Protection, on page 985; a detailed analysis of fire services in Section IV.L.(1), Fire Protection, on page 965; and oilfield and toxic issues in Section IV.I, Safety/Risk of Upset, on page 660. The traffic analysis evaluates Project impacts on an approximately 100-square mile traffic study area that

extends to Santa Monica on the north, Hermosa Beach on the south, and Crenshaw Boulevard to the east. The Draft EIR includes mitigation measures to reduce Project impacts on traffic and air quality, to the extent feasible, pursuant to CEQA guidelines. With the new traffic mitigation measure identified in Section II.15, Corrections and Additions of the Final EIR, the Proposed Project would not have any significant traffic impacts. The Draft EIR also identifies significant impacts on regional air emissions and police and fire services (if Project-generated City revenue were not used for service provision). As described fully in Section IV.I, impacts regarding Safety/Risk of Impact would be less than significant.



**LETTER NO. 74**

Mary Lou Crockett  
7298 W. Manchester Avenue  
Los Angeles, California 90045

[12/22/03]

**Comment 74-1**

Please register my support [*sic*] for Phase 2 “The Village” at Playa Vista to move forward. This housing is critical to anykind [*sic*] of a ballanced [*sic*] life on the Westside.

The traffic issues need to be monitored carefully and promises of a live work environment [*sic*] to minimize car trips in and out,

**Response 74-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 75**

Karen Cross  
Pacesetter Printing  
8626 South Sepulveda Blvd.  
Los Angeles, CA 90045

December 15, 2003

**Comment 75-1**

For those of us who have lived in the area surrounding Playa Vista, we know what The Village property used to be--Howard Hughes' airport. Playa Vista is transforming this old industrial site into a thriving community.

Importantly, part of the transformation includes the development of the riparian corridor. This area, which is currently a collection of weeds and concrete, will have walking trails and native habitat. The corridor is also part of a new stormwater treatment program that will clean water before it enters Santa Monica Bay.

Playa Vista is taking an eyesore and turning it into something that will serve an important environmental purpose and be available for all to enjoy. The riparian corridor cannot be completed without the City's approval of The Village plan.

The Village is good for the environment, good for Santa Monica Bay, and provides some critically needed housing in the process. The project has our support, and deserves to be approved by the City.

**Response 75-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 76**

Mrs. Shawn Crum  
Westchester Resident  
SCrum@coxcastle.com

**Comment 76-1**

I am a resident of Westchester and I have two children. I do not want to loose [sic] the peace and tranquility of my street with excess traffic and speeding cars, and I do not want more traffic on 83rd Street, Regis Way or any other quiet street in Westchester.

I do not want to loose [sic] the view.

It makes no sense to approve Phase II when the impacts of Phase I are only beginning to be felt. Why rush to approve Phase II before completion of Phase I?

**Response 76-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation, on page 798, (with a discussion of impacts on neighborhood streets in Subsection 3.4.7 on page 872 and neighborhood traffic mitigation measures on page 903) a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views), on page 1148, and a detailed analysis of noise in Section IV.E, Noise on page 553. Also see Sections II.8, II.15 and II.27, Corrections and Additions, for the Final EIR. As indicated in the Visual Qualities analysis, on page 1174 of the Draft EIR, the Project's building heights would be well below the height of the bluffs and impacts on view from Westchester locations, south of the Project site would be less than significant. There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project.

**LETTER NO. 77**

Marcelo Cruz, President  
Co-Voice  
6006 West 75th St.  
Westchester, CA 90045

December 12, 2003

**Comment 77-1**

The Village at Playa Vista is significantly smaller than was envisioned years ago, and is designed as a community-friendly place respecting the environment, expanding a wonderful parks system, and increasing open space, all while providing critically-needed housing.

This proposal will result in less than half the number of residential units, a third less office space and nearly 70 percent less retail area as compared to the original master plan for Playa Vista. Along with these reductions is a significant increase in the amount of parks and open space, from 50 percent to 70 percent, of the 1,087 acres encompassing the Playa Vista community.

The Village provides critically-needed housing to help Southern California meet pent-up demand. The developer is planning to build 2,600 residential housing units, ranging from town homes to apartments and condominiums.

Designs for the Village include comprehensive transportation management systems to help with the flow of cars at Playa and throughout region. This builds upon the transportation systems Playa Vista began developing several years ago, including an investment of more than \$100 million to improve and expand intersections and roadways throughout the region.

The Village is a smart plan. It reflects a tremendous amount of thought and community input, and is deserving of the City's support.

**Response 77-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 78**

Christina Davis  
PO Box 5282  
Playa del Rey, CA 90296  
(310) 529-7331  
christinadavis@ymcala.org

December 17, 2003

**Comment 78-1**

Population estimates continue to grow for Los Angeles at a pace that far exceeds the amount of new housing. Where are all these new residents going to live?

The City of Los Angeles should be thrilled that Playa Vista has come along to provide critically needed housing at a time when demand far exceeds supply. We can either continue moving people out to suburbia, or provide opportunities for them to live in the city, closer to where they work.

The Village plan only provides for 2,600 new housing units, but that's a lot more than any other development I know of. Also, there will be a variety of housing at moderate prices, which is exactly what people are looking for. I only wish Playa Vista would build even more housing to meet the demand.

If you haven't come out to Playa Vista, I encourage you to do so. If the second phase is anything like what's being built now, it will be a wonderful addition to the City.

**Response 78-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 79**

Mary Davis  
Ballona Wetlands Land Trust  
Board Member  
7848 Kenyon Avenue  
Los Angeles, California 90045

October 30, 2003

Letter Addressed to:  
Ms. Florence Gharibian  
c/o California EPA  
Department of Toxic Substances Control  
1011 N. Grandview Avenue  
Glendale, CA 91201  
cc: Sue Chang, LA City Department of Planning

**Comment 79-1**

As you know, the Draft Environmental Impact Report (E.I.R.) for Phase II of the Playa Vista Development is currently undergoing public review. As a long-term volunteer who has been working for about six years to preserve and restore the Ballona Wetlands, I urge the Department of Toxic Substances Control to comment on the Draft E.I.R. At this critical juncture, as further development is being planned, and some of the scientific data involved has given rise to questions, the input of the Department would be invaluable. Comments are due by December 22.

I have attached the City's notice and two CD's containing the entire E.I.R. for your convenience.

Please let me know if D.T.S.C. plans to submit comments.

Thank you for your consideration of this matter.

**Response 79-1**

The Lead Agency submitted the Draft EIR to the State Clearinghouse for distribution to State Agencies pursuant to Section 15087 of the CEQA Guidelines, and also submitted, concurrently, copies directly to the Department of Toxic Substances Control (DTSC) in Sacramento and in Glendale. The DTSC has provided comments on the Draft EIR. Those comments, with responses are included as Letter 12.

**LETTER NO. 80**

Don Dearborn  
3020 3rd St.  
Santa Monica, CA 90405

**Comment 80-1**

Please do not agree to Phase 2 of Playa Vista. I live on the border of Venice and Santa Monica and can already see the impact on traffic on Lincoln and Phase one isn't even fully occupied yet.

**Response 80-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The traffic impacts associated with the Proposed Project at intersections along Lincoln Blvd. are discussed in Section IV.K.(1), Traffic and Circulation of the Draft EIR, and Section II.15, Corrections and Additions, in the Final EIR. As indicated, all significant impacts along Lincoln Blvd. would be mitigated to a less than significant level.

**LETTER NO. 81**

Steve Donell  
5801 South Kiyot Way, #1  
Playa Vista, CA 90094

December 12, 2003

**Comment 81-1**

Each month, housing prices in southern California continue to increase at accelerated rates. Anyone with even the most basic understanding of economics knows that a shortage of supply plus insatiable demand, as well as extremely low interest rates, is causing this unprecedented situation. So what is the solution? Build more homes, for one. Not just any homes, though. Los Angeles should be encouraging smart planning.

Playa Vista, where I recently moved, is part of this solution. Sure, I live closer to my neighbors than I would in other parts of Southern California, but that is a small price to pay for the convenience of living on L.A.'s Westside. If we want to live in this city, we must all get used to denser living. I recently moved from Manhattan Beach, where I lived in very close quarters to my neighbors; however, my commute time has been cut in half, which gives me an extra hour each day to tend to my personal life, not to mention the shorter time I find myself in the car. Those of us who live at Playa Vista want The Village to become a reality. It puts close to our homes so many of the services and amenities that we need to live full lives. One day, I look forward to the opportunity of purchasing services, running errands and socializing during the weekend, but without the need to ever get in my car! Approving this project will put the City of Los Angeles at the forefront of urban planning.

I am extremely excited about the prospect of the Village. It was one of the reasons I decided to be one of the very first people to buy a home in Playa Vista. I fully support the Village development and urge you to do the same.

Thank you for your consideration.

**Response 81-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 82**

Donna Downing  
110 Rees Street  
Playa Del Rey, CA 90293

12.21.2003

**Comment 82-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 82-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 83**

Richard W. Eames  
3738 Mountain View Ave.  
Los Angeles, CA 90066

12/22/03

**Comment 83-1**

I am writing to express my feeling that Phase II of the Playa Vista project should be greatly scaled back, or even eliminated. Why the great rush to build Phase II, when Phase I is not complete, and there are so many unresolved questions?

**Response 83-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the Project's impacts and has recommended mitigation measures to reduce potential impacts, pursuant to CEQA guidelines. There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project.

**Comment 83-2**

T[h]e traffic situation on the westside just gets worse and worse. Lincoln Boulevard is virtually unpassable in the afternoon. Where are the mitigations we were promised?

**Response 83-2**

The comment references the existing traffic conditions on the westside in general, and Lincoln Boulevard in particular, and requests the status of mitigation measures. Mitigation measures associated with the adjacent First Phase Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. Completion of mitigation measures adopted in the certification of these documents is proceeding according to the Mitigation Monitoring and Reporting Programs adopted in conjunction with them, and is not under consideration at this time. The Proposed Project will be required to comply with the terms and

mitigation measures set forth in the Draft EIR as well as any other conditions or approvals imposed on the Proposed Project.

**Comment 83-3**

And it seems to me that the city is glossing over the serious problems involving methane under the site. Why build more and increase the city's potential liability?

**Response 83-3**

Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 660, addresses in detail safety at Playa Vista. The commentor's concern regarding the City's liability is not an environmental issue.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 83-4**

I say slow the project down, make the big money interests wait. Do something for the average people, who will not be reaping quick millions on this project, but will have to live with the results.

**Response 83-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 84**

Kenneth Egan  
6553 Firebrand Street  
Los Angeles, CA 90045

December 12, 2003

**Comment 84-1**

The Village at Playa Vista will transform an old industrial area to a smart development that will have far-reaching positive effects on the greater West Los Angeles community and the economy.

For starters, The Village provides housing in a white hot real estate market where demand far exceeds supply. The housing mix proposed by Playa Vista provides opportunities for people to purchase or rent moderately-priced residences. Other developers might have attempted to stack the place with million-dollar homes like at the Venice canals.

At best, The Village will enable people to live and work in the same community. At worst, The Village will enable people to live much closer to where they work in West Los Angeles. Estimates are that there are three jobs for every residence in this part of town. Such an imbalance needs to be fixed, and The Village is doing its share to improve the situation.

Often overlooked are the economic impacts of a development like The Village. It is estimated to create up to 8,000 jobs and infuse \$4 million a year to the city's coffers. The retail center at The Village will also attract businesses that will need to employ people, and will provide work space for entrepreneurs living in the Playa Vista development.

The Village is a smart plan that makes sense for West Los Angeles.

**Response 84-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 85**

barbara eisenberg <barbeebv@yaho.com>

**Comment 85-1**

Playa Vista should not be allowed to progress with any further building over one of the most dangerous gas seeps in the country. There is tremendous potential taxpayer liability if Phase 2 of this project is approved.

**Response 85-1**

Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 660, addresses in detail safety at Playa Vista. The commentor's concern regarding the City's liability is not an environmental issue.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 85-2**

In addition, the enormity of the effect of huge amounts of automobiles put onto the already strained thoroughfares in the area is not sensible nor practical.

**Response 85-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela

Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

**LETTER NO. 86**

Chris Ellison  
527 East Ellis Avenue  
Inglewood, CA 90302

December 17, 2003

**Comment 86-1**

The Village proposal puts valuable services and amenities where people live today, and where many more will live in the near future. New housing and the retail center are the most important components of the plan.

West Los Angeles is known as a jobs-rich, housing poor area. With 2,600 new residential units. The Village will help to correct that imbalance. Also, The Village will create a neighborhood shopping area that will enable residents to shop in their own community without the need to get in their car and drive long distances for cup of coffee or a carton of milk.

The Village is an example of mixed-use planning that is in too short a supply in the City of Los Angeles. Housing, habitat, shopping, public services, parks and smart transportation programs all in one community—that's something that should be celebrated and approved by the City Council.

I join many of my friends and neighbors in supporting this innovative plan.

**Response 86-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 87**

Helfried Fahrenholz  
119 Culver Blvd.  
Playa del Rey, CA 90293

December 2003

**Comment 87-1**

As a member of the community surrounding Playa Vista, I recently attended a presentation on The Village. This project is a perfect example of smart growth and should be a model in the City of Los Angeles for urban planning.

First, I cannot think of a better use for an old former airplane facility than for more housing—which is so badly needed on the Westside. Many of the developers these days are looking to expand housing outside the cities, crowding our streets and highways. Instead Playa Vista is taking an existing unused site and transforming it into a beautiful new community with housing.

Second, the idea that The Village will also have small business to service this new community is the principle at the very core of smart growth. The small business will not only stimulate revenues for the City, but also keep people close by to where they live and off the streets, relieving much of the traffic in the neighborhoods.

Third, The Village will help to complete this new community by providing additional street and intersection improvements, the beautification of public streets, and additional parks for the community—all badly needed, especially with state and local budget concerns.

**Response 87-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 88**

Diane Fecho  
4351 Redwood Ave. #3  
Marina del Rey, CA 90202

December 17, 2003

**Comment 88-1**

The water quality section of the draft EIR for The Village is one of the most important parts of this comprehensive study of the proposed development.

It appears that Playa Vista is willing to take extraordinary measures to ensure the collection and treatment of water runoff before it enters Santa Monica Bay.

First, The village provides for the completion of the riparian corridor which connects to the freshwater marsh. With the system completed, Los Angeles will have an innovative natural stormwater management plan that will improve water quality in Santa Monica Bay. Secondly, the landscaping plan calls for native vegetation that will reduce the need for irrigation water. Furthermore, Playa Vista is implementing state-of-the-art programs to manage the use of pesticides.

Finally, the buildings in The Village will have rooftop drains that will feed water into filters before it enters stormdrains. Can you imagine how better water quality would be in Los Angeles if the everyone in the city implemented measures like those proposed for The Village.

I encourage the City to adopt this draft EIR and applaud Playa Vista in the process.

**Response 88-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 89**

William R. Fecho  
4338 Redwood Avenue, #203B  
Marina del Rey, CA 90292

December 2003

**Comment 89-1**

The development of The Village will add to the visual landscape in the Playa del Rey/Westchester area.

Creating The Village—with its variety of architectural styles, town center design and attractive landscaping—would remove unsightly construction activity, dirt piles, power lines, weeds and remnants of the property's past as a manufacturing site.

Further, residents of the Westchester Bluffs will maintain their panoramic views over the project. Even The Village's highest buildings will be restricted to well below the 120 f t.-high bluffs.

Along Jefferson Boulevard a planted slope, along with a public sidewalk, will run parallel to the street. Canary Island pine trees will line the sidewalk with shrubs and groundcover adorning the slope.

This is on top of all of the wonderful visual improvements Playa-Vista has made in the first phase of the project. The freshwater marsh is a legacy project that has transformed a blighted parcel to a thriving space for plant life and birds. The parks already built—Concert Park, Longwood Park, Crescent Park, Fountain Park—are beautifully landscaped and a plus to the area.

I support The Village for many reasons, but the visual improvements are at the top of my list.

**Response 89-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 90**

James L. Ferro  
2029 Century Park East, 34th Floor  
Los Angeles, California 90067

December 2003

**Comment 90-1**

You don't have a community unless you have parks and open space for people to enjoy. An estimated 70 percent of Playa Vista will be dedicated to parks and open space.

The Village will provide more than 11 acres of parks. The project is being designed to expand the park system already underway in other parts of the Playa Vista community. The parks will vary in size and offer a broad range of recreational experiences, social interaction and cultural opportunities.

These parks will be easily accessible throughout the property and will be connected by a network of paths, sidewalks and nature trails. The overall park system is being designed by noted New York landscape designer Ed Schlossberg.

The Village will also have nearly an acre of bike lanes, and will add 12 acres of new habitat for plants and wildlife in passive open space that will be enjoyed by the community.

For its plan for parks and open space, Playa Vista gets an "A" grade.

**Response 90-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 91**

George Festa  
7323 Kentwood Avenue  
Los Angeles, CA 90045

**Comment 91-1**

Referring to section 3.4.2.1.1.2 Helicopter and Aircraft Noise, I was amazed to see the proposed use of multiple Heliport/Helistop pads. I was also surprised that they could have up to 60 operations per day.

1. What is the purpose of these flights?
2. Why are they needed as we are just minutes away from LAX?
3. Why do they want more helicopter flights than LAX currently has?
4. Is there any other project with such requirements?

**Response 91-1**

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Section 15002 of the State CEQA Guidelines states that the basic purpose of CEQA is to inform governmental decision-makers and the public about the potential, significant environmental effects of a proposed project. No changes to heliport operations are proposed with implementation of the Village at Playa Vista, with the exception of the elimination of one heliport within the boundaries of the Proposed Project. Therefore, there would not be any impacts from heliport operations as a result of the Proposed Project.

Subsection 2.2.5 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 715-717 identifies two heliports currently permitted within the adjacent Campus portion of the previously approved Playa Vista First Phase Project. The Campus is envisioned to provide corporate headquarters-type facilities; as such, one or both of these heliports could become operational in the future to serve corporate executives. The impacts associated with opening one or more of the heliports at Playa Vista were addressed in the 1995 approvals of the Campus at Playa Vista, and are not an issue under consideration at this time. The study performed at that time, "Helistop Noise Study for Playa Vista," has been included in the Appendices of the Final EIR.

**LETTER NO. 92**

<Fiteco@aol.com>

**Comment 92-1**

Playa Vista and Councilwoman Ruth Galanter promised Phase 1 would be finished before any request for approval of Phase 2. What's the rush?

IF YOU ARE CONCERNED ABOUT TRAFFIC IMPACTS OF THE BUILDOUT OF PHASE 1 of PLAYA VISTA, BE ESPECIALLY WARY OF PHASE 2.

**Response 92-1**

There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project. Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 798 analyzes the Proposed Project's traffic impacts. The traffic model for this analysis was developed using a state-of-the art traffic demand model. The traffic impact analysis discussed in the Draft EIR incorporates traffic from the First Phase Playa Vista project as well as other future traffic and ambient growth. Please see Topical Response TR-1, Playa Vista Transportation Model, on page 445, for a discussion of the traffic model and methodology.

**Comment 92-2**

Traffic mitigations are dubious at best and non-existent for many of the "spill over" residential streets. Even now, before we feel the full effects of Phase 1, people are avoiding existing gridlock by driving through residential areas. This will get much worse, if we support additional construction in our Ballona Wetlands. Write your council person.

**Response 92-2**

With mitigation, the Proposed Project would not result in any significant traffic impacts. A new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. In order to protect neighborhood streets, an analysis was done to address neighborhood and cut-through traffic. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458.

**Comment 92-3**

[Fifty-eight]% of the places where Phase 2 traffic will cause a significant impact, Playa Vista has said it can remove the impact by increasing bus seats. Considering the socio-economic level of people paying \$800,000 and above for these homes, we don't think so!

**Response 92-3**

See Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, regarding the issue of potential usage of transit improvements. The proposed transit enhancement mitigation measures are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the mitigation would be effective to reduce potentially significant impacts to less than significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections.

**Comment 92-4**

For 38% of the significant impacts, Playa Vista is only required to (contribute to the design and implementation of...). There is no time certain requirement for this mitigation. It could be years from now or never.

**Response 92-4**

The Proposed Project's contribution to the signal and transit improvements is expected to ensure that these improvements will be implemented. All of the proposed signal system improvements are currently scheduled to be implemented within the overall ATCS/ATSAC Improvement Program being implemented by Los Angeles Department of Transportation.

At locations where the mitigation program calls for the Proposed Project to contribute to the design and implementation of the measure, the contribution is expected to ensure that these improvements will be implemented. All of the proposed signal system improvements are currently scheduled to be implemented.

**Comment 92-5**

Don't let Playa Vista compromise the safety of our neighborhoods. Demand a thorough study of all streets effected by the Playa Vista project.

**Response 92-5**

Please see Response 92-2.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 93**

Annette L. Fletcher  
7506 McConnell Avenue  
Westchester, CA 90045

**Comment 93-1**

[Hand note added to the City of Los Angeles notice dated September 18, 2003, regarding time extension of the Village at Playa Vista Draft EIR public review period]

Note: And, you're going to do what to help the traffic on Lincoln between 83rd St. and Jefferson. Please!

**Response 93-1**

The segment of Lincoln Boulevard between 83rd Street and Jefferson Boulevard includes the intersections of Lincoln Boulevard at 83rd Street, LMU Drive, Bluff Creek Drive and Jefferson Boulevard. A roadway improvement is being currently implemented to widen Lincoln Boulevard between Loyola and Jefferson Boulevard to provide a fourth northbound travel lane along Lincoln Boulevard. As part of the mitigation program for the previously approved Playa Vista First Phase Project, an additional four buses (plus one spare bus) for the Santa Monica Big Blue Bus Line 3 will be provided along Lincoln Boulevard.

As shown in Figure 76, contained in subsection 4.0, Section IV.K.(1), Traffic and Circulation, on page 888 of the Draft EIR, the segment of Lincoln Boulevard between 83rd Street and Jefferson is proposed to be mitigated by the Proposed Project through implementation of transit enhancements, including Transit Priority System signal improvements, the extension of a regional bus line along Jefferson Boulevard, and an expanded shuttle system. In addition, as described on page 896 of the Draft EIR, the intersection of Lincoln/83rd Street would be improved with additional signal equipment and implementation of the Adaptive Traffic Control System (ATCS). The Draft EIR concludes that impacts at these locations would be mitigated to a less than significant level.



**LETTER NO. 94**

D. Forrest  
P.O. Box 5764  
Santa Monica, CA 90409

**Comment 94-1**

Please stop further development of Playa Vista. Preserve the last remaining open areas. Stop the increased grid lock in the Culver City/Santa Monica/Westchester areas. Preserve the quality of life on the Westside! Hear our voices, please!

**Response 94-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 95**

Lisa and Randy Freeman  
3705 Wasatch Avenue  
Mar Vista, CA 90066-3633

**Comment 95-1**

As 12-year residents of Mar Vista, my husband and I are extremely alarmed at the msuhrooming [*sic*] traffic, pollution and noise as development in the area continues unabated. We opposed the Playa Vista development from the beginning, yet no one listened to the community's concerns. Now, as Playa Vista begins to rent out and sell its Phase I properties, we are already beginning to see the impact in traffic flow and noise on Centinela and Beethoven [*sic*] and Lincoln Blvds. This, we know, is the tip of the iceberg. As more of PV is completed, our living conditions will worsen. We strongly request that you oppose PV's Phase II development and seriously consider the concerns of the 55,000 residents of Mar Vista, as outlined in the below document from the Mar Vista Community Council.

**Response 95-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The Proposed Project's potential impacts to traffic, air quality and noise are addressed in Sections IV.K.(1), IV.B, and IV.E of the Draft EIR, respectively. Corrections and Additions to these sections are contained in Sections II.15, II.4 and II.8, respectively, of the Final EIR.

**Comment 95-2**

[Copy of Mar Vista Community Council's letter to Sue Chang dated December 19, 2003, attached.]

**Response 95-2**

The attachment is a duplicate of letter submittal 7. As such, the comments are addressed in Responses 7-1 through 7-28.

**LETTER NO. 96**

Sandra Garber  
2405 S. Holt Avenue  
Los Angeles, CA 90034-2126

**Comment 96-1**

I hope that you will oppose any further development at Playa Vista. Some of the reasons are the already existing state of gridlock along Lincoln Bl. in that area, the danger posed to residents by underground methane gas and the uncertainty of the mitigation measures proposed to contain it, and the extreme liability for the city if those measures do fail to protect people.

The development built so far is UGLY—it looks like a fancy correctional facility. It will be a blight on what otherwise could be a wonderful, nature-oriented urban park, providing desperately needed open space in a natural setting, convenient for all residents of Los Angeles.

The Ballona Valley has been an important ecosystem and much needed stop on the Pacific Flyway for migrating birds. The opportunities it offers for nature preservation and public recreation and education should not be undervalued.

**Response 96-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of potential methane impacts in Section IV.I, Safety/Risk of Upset on page 660, a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148, a detailed analysis of biological resources in Section IV.D, Biotic Resources on page 523, and a detailed analysis of parks in Section IV.L.(4), Parks and Recreation on page 1022.

**LETTER NO. 97**

Dorothy Garven  
3630 Inglewood Boulevard  
Los Angeles, CA 90066

**Comment 97-1**

Now is the time for you to be mindful of your mission as a Los Angeles City Planner. One of those missions among others, I am sure, is to approve development that promotes an improved quality of life for the residents—certainly not to allow degradation of quality of life.

It is not right to impose the development of Playa Vista on us. We already are asked to take care of an exploding population causing stress on schools, police, fire and other city services, as well as directly affecting existing residents in the form of taxes and poorer quality of life.

**Response 97-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 97-2**

Already, Inglewood Blvd. (the street on which I live) is backed up for 2 blocks every night and morning with mostly cut through traffic from Centinela which can no longer carry the existing traffic. Additional building at Playa Vista will only exacerbate this problem.

**Response 97-2**

The commentor raises specific comments relating to the existing traffic conditions on Inglewood Boulevard and suggests commuter cut-through traffic is a substantial portion of that existing traffic. Such traffic would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812.

The Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed in Subsection 3.4.7, the Proposed Project would not result in any significant impacts on neighborhood traffic in the Mar Vista area.

**Comment 97-3**

I have already moved once from a closer proximity to Santa Monica Airport (in 1997) when the noise and fumes from jets got to be intolerable. The entertainment types who will be the ones buying at Playa Vista will only increase this air traffic with their private jets.

**Response 97-3**

The Proposed Project does not propose any additional corporate, “entertainment industry” office space, but rather includes space for professional offices (i.e., doctors, dentists, banks, real estate offices, etc.). The Proposed Project is not anticipated to affect the operations of private/chartered jets at Santa Monica airport or LAX.

Santa Monica Airport has no commercial service, so a general increase in population at the Proposed Project will not necessarily lead to any increase in use at the airport. To the extent that a general increase in population at the Proposed Project will lead to increased private general aviation traffic at the airport, there is no reasonable way of measuring the prospect of private use of civil aviation. The airport imposes flight and noise restrictions which would apply to any resident at the Proposed Project, such as the Single Event Noise Exposure Level (SENEL) restriction contained in Section 10.04.04.060 of the Santa Monica Municipal Code. There are also curfew and other restrictions described in Chapter 10.04 of the Municipal Code. Uses and limitations upon traffic at the airport are within the jurisdiction of the Federal Aviation Administration and, to some extent, the City of Santa Monica.

**Comment 97-4**

Furthermore, Playa Vista will have heliport pads which will bring the helicopters lower over our homes and at all hours of the night. The necessary police helicopters are all that we should be asked to put up with.

**Response 97-4**

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Section 15002 of the State CEQA Guidelines states that the basic purpose of CEQA is to inform governmental decision-makers and the public about the potential, significant environmental effects of a proposed project. No changes to heliport operations are proposed with implementation of the Village at Playa Vista, with the exception of the elimination of one heliport within the boundaries of the Proposed Project. Therefore, there would not be any impacts from heliport operations as a result of the Proposed Project.

Subsection 2.2.5 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 715-717 identifies two heliports currently permitted within the adjacent Campus portion of the previously

approved Playa Vista First Phase Project. The Campus is envisioned to provide corporate headquarters-type facilities; as such, one or both of these heliports could become operational in the future to serve corporate executives. The impacts associated with opening one or more of the heliports at Playa Vista were addressed in the 1995 approvals of the Campus at Playa Vista, and are not an issue under consideration at this time. The study performed at that time, "Helistop Noise Study for Playa Vista," has been included in the Appendices of the Final EIR.

**Comment 97-5**

Why is it so necessary to blindly BUILD, BUILD, BUILD and inflict this misery on the residents of the Westside?

**Response 97-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 98**

Aimee Gates  
510 S. Burnside Avenue, #11A  
Los Angeles, CA 90036

**Comment 98-1**

I'm writing to voice my opinion on the development of "The Village" within Playa Vista. I recently put a deposit down on a condo in the Crescent Walk development of Playa Vista and I am shocked and upset to find out that there may be further opposition to the development of "The Village." A major reason for my interest in Playa Vista was the idea of having retail, commercial, and residential properties all within one community. This is my first home and I was excited to finally find a community that would provide not only a place to live, but also social activities and nearby shopping. I think it would be a huge mistake to prohibit the building of the retail and commercial spaces. The more shops available within walking distance means less time driving and polluting the environment. Clearly "The Village" will save on traffic, congestion, and pollution, and will make Playa Vista more livable and keep the surrounding environment cleaner.

I strongly support the development of "The Village," as presented in the draft environmental impact report, and I hope you will consider the homeowners of Playa Vista properties when making your decision.

**Response 98-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 99**

Dorraine Gilbert  
241 Rees Street  
Playa del Rey, CA 90293

**Comment 99-1**

Living in Playa del Rey for the last nine years had me worried about Playa Vista... until it opened and we were invited to see what they were doing. I had felt the development would be too big for the area with buildings that seemed far too dense. Now that I have visited the site, it is easier to see the vision projected for Playa Vista. The management has held several meetings and we appreciate the traffic signal improvements and roadway widening started and on-going.

I was afraid that so many new residents would make traffic congestion, already bad, unbearable. This brings me to the solution proposed by the Playa Vista planners, the Village which will enable residents to meet many of their retail needs conveniently within walking distance.

Construction of the Village is needed to complete the vision. I think it is very important to have places to shop as well as places to live in a planned community. My recent visit to Israel made it even clearer to me. My son and his family live in a planned community outside of Jerusalem. As their community has grown so has their shopping area. In years past they had to go into Jerusalem for almost everything. What a pleasure it is in their town to be able to drive no more than a few minutes to shop.

I believe the Village will accomplish the same thing for Playa Vista. A community needs parks, open space, a library and shopping to make a community. I feel that as a local resident I will probably want to avail myself of the stores and restaurants in the community. It looks charming in the plans and execution of plans has been good so far.

I have no doubt that The Village will fit into the vision of Playa Vista, and I encourage the City to support this second phase of the project.

**Response 99-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 100**

Barry Gribbon  
6975 Trolleyway  
Playa del Rey, CA 90293

12.19.2003

**Comment 100-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

Thank you for your consideration.

**Response 100-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 101**

Jennifer Gribbon  
6975 Trolleyway  
Playa del Rey, CA 90293

12.19.2003

**Comment 101-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

Thank you for your consideration.

**Response 101-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 102**

Howard Hackett  
5208 Etheldo Avenue  
Culver City, CA 90230

**Comment 102-1**

First of all, I want to compliment the drafters of the EIR. A lot of thought and effort went into its planning and preparation. I have spent numerous hours with the document at the public library and now have the two CD's at home to review.

I wish to comment on three areas. I consider these major omissions, or not following Best Management Practices BMP's, and making poor mitigation choices.

The three areas are questionable:

1. Fourteen Parks within the two mile radius. You have omitted the Baldwin Hills Regional Park. This is a major omission because part of the PR on Playa Vista Village was the closeness to the new regional park, that will soon be larger than Central Park in New York. The PR toted [*sic*] that it would be possible to take a short bicycle ride and play in this new park. Further, there are no plans created to access any of these 14 locations except by automobile. The EIR omitted walking and biking access to all of them. Please add this important omission.

**Response 102-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Baldwin Hills Regional Park appears to refer to the Baldwin Hills Park Master Plan, which is a proposed facility subject to planning and funding activities. As such, it was not identified as an existing park facility in the analysis of Proposed Project impacts on Parks. Pursuant to CEQA Guidelines, the Draft EIR analyzes impacts on parks and bikeways in Sections IV.L.(4) and IV.K.(3) of the Draft EIR, respectively. To the extent that the park provides new recreation opportunities in the region, it would relieve demand for service at other park locations and reduce their potential impacts from future regional growth. The availability of such a regional park would not alter the conclusions regarding impacts on parks that were presented in Section IV.K.(3), Bicycle Plan, of the Draft EIR. With mitigation, impacts on parks would be less than significant.

The analysis of impacts on bikeways in Section IV.K.(3), Bicycle Plan, analyzes the impacts of the Proposed Project and, where necessary, mitigation measures to address the Project's impacts. As indicated in Subsection 3.4.1 of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 961,

the Project's Class II lanes would link with other bikeways, would be compatible with adjacent Playa Vista First Phase Project bikeways and provide enhanced service for the Proposed Project's population, Playa Vista First Phase Project's population and regional travelers passing through the site on their longer journeys. The new bikeways would improve the quality of bikeway service. Thus, the Proposed Project would not interfere with the implementation of any planned bikeways, but would expand upon and complement existing Bike Plans. No mitigation measures are required. The comments regarding walking and biking between the Project and the site of the Baldwin Hills Regional Park are noted.

### **Comment 102-2**

2. Traffic and Circulation. The analysis of the 218 intersections within an approximate 110-square mile traffic study area show most rated as D, E, F levels of service. Please note. You cannot improve these intersections significantly by installing "turn pockets." Engineer them properly or leave them alone. How about adding means for "traffic calming." It works for the city of Santa Monica. Cut speed through intersections, not increase them. It is your duty, and the development criteria regulations to keep non resident traffic off our local neighborhood streets. You miss the point completely by "improving" intersections. Think Traffic Calming instead. Beautify our neighborhood streets, not turn them into speedways. You cannot covert [sic] D, E, and F intersections into A's anyway. Therefore your so called traffic mitigation planning is for naught.

### **Response 102-2**

The 218 intersections analyzed are part of the regional arterial network, with the primary focus on moving vehicular traffic. The City has a required methodology for assessing impacts to this system, and requires mitigation to address significant impacts thus identified. Effective mitigation measures include physical improvements, signal system improvements, alternative transportation (e.g., transit), and transportation demand management. Traffic calming on arterials would not work because it would worsen congestion on the arterial system and push traffic to other streets (i.e., neighborhoods).

It should be noted that improvement of arterial street intersections enhances mobility on the arterial roadway system and therefore reduces the potential for non-resident traffic intrusion on local streets.

The Draft EIR contains a discussion of potential project traffic impacts on neighborhood streets and mitigation for same; See Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872 and Subsection 4.0 on page 903 of the Draft EIR. The neighborhood traffic impact analysis concludes that the Proposed Project may have significant impacts on the residential neighborhood bounded by Inglewood Boulevard, Ballona Creek, Sawtelle Boulevard, and Bray Street/Port Road, and includes a mitigation measure to address these impacts (page 903). In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the

affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means. See Topical Response TR-5, Neighborhood Traffic Impacts, on page 458 above.

### **Comment 102-3**

I live in the del Rey neighborhood. Friends and colleagues have already moved in to Playa Vista so I see that as part of my community. As it grows in size, more of us will become neighbors and friends and share the same joys and concerns.

One of my joys is riding the bicycle for pleasure and commuting. I would like to bring to your attention the [sic]

3. Non planning for bicycle trails to connect the Village to surrounding Bicycle Trails and communities.

We now have major traffic concerns on the west side. This project will significantly add to this problem. We in the bicycle community firmly believe that part of the solution will be to get folks out of their autos and in to walking and bicycling modes of transportation. A recent California study points out that most trips are 2 miles or less. This plan if adopted as proposed will isolate residents to the confined walls within the Village. If one dares to ride on streets such as Lincoln Blvd., Jefferson Blvd., Centinela Ave., and Inglewood Blvd. they do so with great risk. The plan has specific Class I and Class II trails within the complex. This is good planning internally for the Village. (You even gave them "park credits" for this feature." I do not comprehend this thinking when nothing has been recommended for community connections. I do give you credit for showing Class II trails on Runway Road, McConnel Avenue, 2nd [S]treet, Millennium, and Bluff Creek Drive. Good work.

You even point out in the EIR that Class I and Class II bicycle lanes will be provided on Lincoln Blvd. south, from Jefferson, to Manchester in Westchester. Your departments MAY have had some input on these trails, but the LACBC and bicycle community, Playa Vista, Caltrans, LADOT, the Coastal Commission and others did a lot of negotiation to make it happen. Without this pressure, Lincoln Blvd. south from Jefferson to Manchester would have been additional solid auto/truck lanes.

### **Response 102-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The analysis of Proposed Project impacts on Parks in Section IV.L.(4), Parks and Recreation, of the Draft EIR does not include the area allocated to bikeways, approximately 1.0 acres, in the

Project's provision of park space, approximately 11.4 acres. The discussion in the Parks analysis identifies the bikeways as an additional Project feature.

#### **Comment 102-4**

You further make a special effort to define Bike trails in the area. The South Bay 22 mile Class I trail, the 8 mile Ballona Creek Class I Trail and the Culver Blvd. Class I Trail. This is good information, but unless means are provide [sic] for connections to these important trails, this a waste of time, paper and effort. How about adding bike lanes from surrounding communities that connect to these wonderful Class I Bicycle Trails.

#### **Response 102-4**

Please refer to Response 102-1, above.

#### **Comment 102-5**

(ALSO TAKEN FROM THE EIR) "In addition, the Bicycle Plan points out design issues which should be considered, such as traffic control, safety, and convenience. At this time the City uses standards in Chapter 11, "Bikeway Planning and Design," of the Caltrans Highway Design Manual.<sup>377</sup> These standards address design criteria relating to lane widths, striping, signing, intersection design, surface materials, and other related topics."

<sup>377</sup> Anthony Nyivih, Civil Engineer, Program Development Division, Los Angeles County Department of Public Works, February 25, 2003."

Further quotes: "The following objectives are included in the Bicycle Plan:"

- To make bicycling, for both transportation and recreation, a safer activity.
- To encourage and facilitate bicycle riding as an important mode of personal won as well as a pleasant source of outdoor exercise.
- To establish policies, guidelines, standards and criteria to facilitate the development of a comprehensive bicycle transportation and recreation system for the City.
- To identify route locations appropriate for known and potential bicycle trip demand.
- To assure that the routes chosen are compatible with the routes of neighboring municipalities.
- To establish criteria for implementation.
- To qualify the City for various funding sources.

The criteria address both the desired location of bikeways and the design standards under which they would be developed. Some of the locational criteria are related to the costs and

Bikeway systems have been grouped into three classes:

- Class I Bikeway—Bicycle Path or Trail
- Class II Bikeway—Bicycle Lane
- Class III Bikeway—Bicycle Route

There are approximately 300 miles of bike routes throughout the City which provide basic continuity and which can be expanded as needed.”

This is interesting news to the uninformed in the community. However the traffic planners completely ignored the City of Los Angeles, the County of Los Angeles, and Caltrans rules concerning the provision of bicycle trails from any new construction projects. Traffic mitigation to city planners ONLY focuses on means to move autos and trucks to the freeways where motorists can sit in gridlock during most hours of the day. Further, planning consists of turning existing residential streets, into new highways to connect to these freeways. This is inappropriate planning.

Our neighborhood streets are to be widened, re-striped with freeway type signage, left and right turn pockets, without one thought given on how a bicyclist can even safely ride the ¼ mile from the Village at Playa Vista to the Ballona Creek Bicycle Class I trail. The Ballona Creek trail is the only Class I east west trail on the west side of the city.

How about considering a “bicycle rider” factor, to mitigate some of the projected traffic increases?

As you can see, I have included some of the EIR writing in my comments to you. This has been done to impress upon you the great verbiage. However, if you look farther in the details, you will not find even one comment about including additional bike trails in the plan. Not even a comment about one sign that might say “CAUTION BICYCLE AHEAD”

### **Response 102-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As cited in Subsection 2.1.2.1 of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 955 at the beginning of this comment: “At this time the City uses standards in Chapter 11, “Bikeway Planning and Design,” of the Caltrans Highway Design Manual. These standards address design criteria relating to lane widths, striping, signing, intersection design, surface materials, and other related topics.” As such, these standards would be applicable to construction of the Proposed Project. As noted in Response 102-1, the Draft EIR focuses on impacts of the Proposed Project and its required mitigation measures, pursuant to CEQA.

**Comment 102-6**

In summary, please consider the following:

1. Parks

Add the Baldwin Hills Regional Park to this section. At least one entrance will fall within your 2 mile radius criteria. Also include means for Village residents to hike/walk and bicycle to all these other recreational sites.

**Response 102-6**

Please refer to Response 102-1, above.

**Comment 102-7**

2. Traffic and Circulation

You cannot improve any of 210 intersections significantly by installing “turn pockets.” There are examples in our neighborhoods where traffic is delayed, possibly by poor design, or other factors that planners must know about. A bicycle commuter also has a perilous problem getting safely through some of these intersections. How about adding means for “traffic calming.” It works for the city of Santa Monica. Incidentally, Santa Monica has reached out to the bicycle community and has added numerous routes throughout the city. An example of good design, is the case where a right turn pocket has a bicycle lane for through traffic marked on the left hand side of the turn lane. Cut speed through intersections, not increase speed. It is your duty, and the development criteria’s regulations to keep non resident traffic off our local neighborhood streets. You miss the point completely by “improving” intersections. Think Traffic calming instead.

**Response 102-7**

Please see Response 102-2, above.

**Comment 102-8**

3. Non planning for bicycle trails to connect the Village to surrounding Bicycle Trails and the local communities. We now have major traffic concerns on the west side. Help us get people out of their autos for those short trips. Implement my recommendations as listed above. Rethink the whole Traffic Plan. Include bicycle routes. My recommendations for improvements are as follows:

Add Bicycle Trails on both sides of streets/highways on

1. All Streets in and out of the Village



2. Jefferson Blvd. from the Pacific Ocean to Sepulveda Blvd. on the east. Sepulveda is a designated north south trail connecting the west side to the San Fernando [V]alley.
3. Centinela Blvd. from Jefferson Blvd. to Venice Blvd. Venice Blvd. is the only Class II trail, connecting the west side of the city, to downtown Los Angeles.
4. Inglewood Blvd. from Jefferson Blvd. to Venice Blvd.
5. Lincoln Blvd. North to Fiji. from Jefferson Blvd. The present plan is to re-stripe the existing 4 lanes to 6 lanes, eliminating any chance of even safely reaching the Ballona Creek Trail, let alone making it to a Marina destination.
6. Jefferson Blvd. from Sepulveda Blvd. to the Fox Hills Mall Transit Center. All city busses are equipped with bicycle racks. Make it possible to ride to and from the Village to the Transit Center, Sepulveda Slauson, load the bike on the bus and commute to most anywhere in LA County, and beyond.

**Response 102-8**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 102-9**

Overall the EIR is well thought out. A lot of great work has been done to insure that the Village project will succeed. Playa Vista is, and will be an asset, for the west side for decades to come. Thank you for this chance to comment on the EIR.

Lastly, please focus on these important changes to the EIR that I have brought to your attention. To create a great EIR for a new community, and completely ignore existing nearby neighborhoods is just not appropriate.

**Response 102-9**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 103**

Susana Halpine  
239 Sunridge Street  
Playa del Rey, CA 90293

December 21, 2003

**Comment 103-1**

I urge you to stop Playa Vista's Phase 2. The New York business interests have recreated a monstrous version of an overcrowded Eastern city—the corner of Lincoln and Jefferson should be renamed Newark West.

- Eye-sore on Lincoln: The rat-maze architecture is four stories high and much denser than other multi-dwelling housing in the Playa del Rey-Westchester area. At the very least, they should have decided on a single architectural styles [sic] instead of the present hog-pog [sic], and moved the housing back from the street to conform with comparable local multi-housing.
- Negative impact on local housing market: As a recent homeowner in the area, I am concerned that the high housing density already existing in Playa Vista will have a negative impact on the local housing market.
- Smarter use of housing tax incentives: The needed housing should be built using existing infrastructure and in parts of the city that need revitalization dollars.
- Traffic Gridlock: Phase 2 will place additional vehicles in the unbearable Lincoln corridor traffic.
- Increase Air Pollution: Cute golf-carts showcased by Playa Vista developers will not alleviate the additional air pollution caused by increased car-trips.

Stopping further expansion of Playa Vista is FAIRNESS, NOT NIMBY'ism. The Playa del Rey-Westchester residents already contend with:

- Ballona Creek runoff fouling our beaches
- LAX airport—the biggest source of traffic, air and noise pollution
- Hyperion Water Treatment Facility and its foul odor discharges
- Scattergood Power Plant air pollution
- Sempra natural gas plant toxic discharge and odors

- Chevron oil refinery air pollution

The wetlands and the open space are minimal mitigation for the effects these public facilities. Please STOP Playa Vista's Phase 2 expansion.

**Response 103-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148, a detailed analysis of housing in Section IV.J, Population, Housing and Employment on page 742, a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of air pollution in Section IV.B, Air Quality on page 270, a detailed analysis of runoff in Section IV.C.(2), Water Quality on page 400, a detailed analysis of noise in Section IV.E, Noise on page 553, and a detailed analysis of wastewater in Section IV.N.(2), Wastewater on page 1100. Corrections and Additions to these sections of the Draft EIR are contained in Section II.27, II.14, II.15, II.4, II.6, II.8 and II.25, respectively, of this Final EIR.

**LETTER NO. 104**

Ann Henrichs  
8700 Pershing Drive, #5222  
Playa del Rey, CA 90293

**Comment 104-1**

I recently had the opportunity to visit Playa Vista for the first time; and I was very impressed.

There were many beautiful parks built for the community, and I was amazed by the restoration of the freshwater marsh. The architecture was interesting with quite a range of different kinds of homes.

What impressed me most was how much of a community Playa Vista is. People walking down the street said “hello,” and neighbors knew each other. Unfortunately, few communities in Los Angeles can say that.

I am writing to support The Village, which will provide new shops, restaurants and parks to the Playa Vista neighborhood. These new amenities will only enhance the community feel and make Playa Vista an even better place to live. I am also pleased that all of Playa Vista’s amenities—parks, the library, etc.—will be also be open for us in the surrounding communities.

Playa Vista appears to be a wonderful place to live. It is a nice place to visit, and approval of the Village will make it even better.

**Response 104-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 105**

David A. Herbst  
Westchester, CA 90045

**Comment 105-1**

The Village at Playa Vista will be the culmination of the visionary concept conceived by Nelson Rising, Doug Gardner and set into motion by Peter Denniston and others who dreamed of a place that not only addressed Los Angeles' vital need for more housing, but also took into consideration the important issues of environmental preservation and coexistence with a surrounding community built in the post-World War II era.

Over the years, Playa Vista has continually changed and adapted to the needs and desires of the community, ultimately resulting in a model for urban development. The sale of land west of Lincoln Boulevard as open space addresses the concerns for the environment expressed by Ruth Lansford, the Friends of the Ballona Wetlands and others. In addition, the fact that the project now has 70 percent open space and a fully functioning freshwater marsh that is attracting scores of new bird species, should make true environmentalists ecstatic.

The extensive mix of new housing, including affordable housing products, addresses the need for the city to provide more and more affordable places for people to live near their jobs on the Westside. This has been the chief housing goal of numerous members of the City Council and our Mayor. At Playa Vista, a significant amount of the new housing (both in the first phase and in The Village) will be reserved for very low, low and moderate-income families. I am extremely proud that during my tenure with Playa Vista I was able to work on securing the funding and approvals for the first affordable homes on site.

Of course, Playa Vista is replete with examples of sustainable design, energy efficiency and other initiatives designed to reduce traffic and pollution.

The Village is the missing piece to this complex puzzle. By providing retail establishments next to the already approved residential area, more residents will be encouraged to leave their cars at home when going grocery shopping, out to eat or to the doctor's office. Furthermore, The Village completes the vital riparian corridor that stretches along the base of the Bluffs and provides an important first stage for the water entering the freshwater marsh. In addition, The Village will complete the roadway improvements along Jefferson Boulevard and complete construction of Bluff Creek Drive—a new east-west alternative that will make it easier to reach the 405. All these infrastructure improvements will not only benefit Playa Vista, but those of us who live in the surrounding community.

More than two decades have gone into the planning and design of Playa Vista and The Village, and its completion will be a shining accomplishment for everyone who has ever worked at Playa Vista, for the people who will eventually call The Village "home," and for the City of Los

Angeles, which can point to it forever as a model of how urban development can be responsible and successful.

**Response 105-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 106**

Lloyd G. Hild  
7429 McConnell Avenue  
Los Angeles, CA 90045-1036

**Comment 106-1**

As a resident with beautiful views from atop the Westchester Bluffs, I have been quite concerned about Playa Vista's plans for The Village. Specifically, I wanted to make sure that the development would not in any way negatively impact the views from my backyard.

I heard a presentation by Playa Vista representatives and understand that all buildings in the Village will be restricted to well below the height of the bluffs. The first phase of Playa Vista has had a positive impact on the view. Instead of looking at an old industrial site, I will look out at a property that includes the freshwater marsh, some parks and buildings of varied architecture.

My sight lines are important to me, and I am confident that they will only get better with the Village—as long as the City of Los Angeles forces Playa Vista to live up to the building height restrictions.

In summary, I'd like to say that Playa Vista has had a positive impact in our community, and with the Village, the views should only get better. What was once an industrial site (and a deteriorating one at that), is turning into a very nice mixed use community.

**Response 106-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Impacts of the Proposed Project on Visual Qualities (Aesthetics and Views) are addressed in Section IV.O of the Draft EIR, beginning on page 1148. The proposed height limits are shown in Figure 103, page 1166 of the Draft EIR. As stated on page 1177, panoramic views would still be present from all locations along the Westchester Bluffs.

**LETTER NO. 107**

James Hill  
James Hill and Associates  
8324 Chase Street  
Los Angeles, CA 90045

**Comment 107-1**

I've lived in the Westchester community long enough to see the different development plans people have had for the former Hughes site. In the 80s, plans called for high rise condominiums, a regional mall, a hotel and a golf course through the wetlands. Then Maguire Thomas came along and proposed a master plan that would have had 13,000 residential units, a large mall, a hotel and a little marina.

Now we're down to the final proposal—The Village. Under this plan, the entire Playa Vista development will have less than 6,000 homes. Seventy percent of the property will be open space, thanks in part to the sale of the land west of Lincoln to the State of California. The hotel is gone. 7,000 proposed homes are gone. The regional shopping center is gone. The little marina is gone.

What's in the Village proposal are parks, open space, a neighborhood-serving, retail center and loads of regional transportation improvements. It looks like Playa Vista has finally got it right. This proposal deserves prompt approval from the City Council.

**Response 107-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 108**

Ellie Holm  
7417 Henefer Avenue  
Westchester, CA 90045

Jacqueline M. Dewar  
6511 Firebrand Street  
Los Angeles, CA 90045

Adelle Vodovoz Wexler  
6529 Hedding Street  
Westchester, CA 90045

December 22, 2003

**Comment 108-1**

According to the Specific plan Procedures Amended by Ordinance No. 170,785 Effective January 13, 1996, Section 6—Height of Building Structures (copy attached). pp. 12 & 13.

B. “Within the entire Specific Plan Area, Buildings or structures on a limited number of lots may exceed the height of the nearest bluff.”

C. “Within the entire Specific Plan Area, buildings or structures on a limited number of lots may exceed two-hundred forty (240) feet above the grade.”

Since the situation has changed and the owner of the parcel (Dreamworks) withdrew their offer to buy the parcel, the 240 ft height request should be taken out of the Playa Vista Area D Specific Plan. The Westchester Bluff residents were promised protection of their views and that no building would extend beyond the height of the bluff line. 75 feet.

The height of 240 ft. is unacceptable and must be reconsidered by the City of Los Angeles. No building should exceed the height of the bluff in the Playa Vista Project Plan. (75 ft.)

Please include in the Village EIR.

**Response 108-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

This comment refers to an adjacent parcel within the First Phase Project at Playa Vista (The Campus at Playa Vista), which was previously approved by the City and is not under consideration in this EIR.

Impacts of the Proposed Project on Visual Qualities (Aesthetics and Views) are addressed in Section IV.O of the Draft EIR, beginning on page 1148. The proposed height limits are shown in Figure 103, page 1166 of the Draft EIR. These height limits restrict heights within the Village to two height zones, 95 feet AMSL and 112 feet AMSL, both of which are lower than the height of the Westchester Bluffs (average height of 140 feet AMSL). As stated on page 1177, panoramic views would still be present from all locations along the Westchester Bluffs with implementation of the Proposed Project.

## **Comment 108-2**

### 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

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#### A Part of the General Plan - City of Los Angeles

<http://cityplanning.lacity.org> (General Plan - Specific Plan)

## 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.

**Response 108-2**

The attachment supports statements in Comment 108-1. As such, the attachment is addressed in Response 108-1.

**LETTER NO. 109**

Eleanor Holm  
7417 Henefer Avenue  
Westchester, CA 90045

**Comment 109-1**

Regarding Bluff Creek Drive:

Because the highway is in close proximity to the Westchester Bluffs and the homes located above the project, the following mitigation measures should be considered to reduce noise and pollution impacts from Bluff Creek Road.

- Limit the size and weight of trucks allowed to use Bluff Creek Dr. There is concerned [*sic*] about the stability of the sloping portion of the bluffs from heavy truck vibration, and, also, reduce the noise which impacts the homes above the project. The larger trucks have the option of using Jefferson Blvd.

**Response 109-1**

The portion of this comment referring to pollution is addressed in Response 109-2. The composite roadway noise impacts shown in Table 77 on page 577 of the Draft EIR are detailed by roadway segment in the Noise Technical Appendix (Appendix H). As detailed therein, worst-case roadway noise impacts attributable to development of the Proposed Project (that includes truck traffic volumes along Bluff Creek Drive) would be 0.3 dBA, in terms of the peak  $L_{eq}$  and CNEL noise descriptors. The uses that would be served by Bluff Creek Drive (e.g., residential, local-serving retail, office, etc.) typically do not generate large volumes of heavy-duty truck trips. As noise and vibration impacts would not be significant, no mitigation measures are required.

**Comment 109-2**

- Prohibit diesel trucks and buses from using Bluff Creek Dr. (Studies at UCLA have shown that diesel fuel is highly toxic.) Jefferson Blvd. is an option for these vehicles.

**Response 109-2**

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The commentor correctly identifies that studies have shown that mobile source diesel exhaust contains air toxics. However, Bluff Creek Drive would not be a significant source of mobile-source toxic air emissions as Bluff Creek Drive is a non-contiguous roadway that would serve uses within the Playa Vista project area (e.g., residential, local-serving retail, office, etc.) that typically do not generate large volumes of heavy-duty truck and bus trips. In addition, it is more likely that truck and bus traffic that approaches/departs the project site from the north and east would use Jefferson Boulevard, due to Jefferson Boulevard's direct access from/to the 405 Freeway and Sepulveda Boulevard. Furthermore, the transit bus fleet is increasingly powered by alternative fuels such as compressed natural gas (CNG) and liquified petroleum gas (LPG) rather than diesel fuel. Since air toxic impacts from mobile sources would not be significant, no mitigation measures would be required.

### **Comment 109-3**

- Prohibit trucks carrying combustible materials from using Bluff Creek Dr.

### **Response 109-3**

The Proposed Project will comply with all applicable regulations and requirements regarding truck traffic. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 109-4**

- Who is responsible for the protection of the Westchester Bluffs? (The City of Los Angeles or Playa Vista?)

### **Response 109-4**

The Westchester Bluffs extend along the southern boundary of the Proposed Project and adjacent First Phase Project from Lincoln Boulevard on the west to Centinela Avenue on the east. Several separate property owners hold portions of the bluffs, including Loyola Marymount University, the Applicant, and various residential property owners on top of the bluff. In addition, the City has an easement for the North Outfall Sewer (NOS), which runs beneath Cabora Road (a maintenance road running midway up the bluffs). In the area adjacent to the Proposed Project, the Applicant owns and is responsible for the portion of the bluff to the north of Cabora Road.

Individual property owners, including the Applicant, are responsible for the maintenance and protection of the portions of the bluffs under their ownership. The City is responsible for maintenance related to their easement for the NOS.

**Comment 109-5**

The attached letter sent to Ruth Galanter by the National Audubon Society, November 30, 1987 should be included in the Village EIR. The letter “brings to your attention the ecological importance of the Westchester Bluffs to the Ballona Wetland.”

As a protective measure for the environmentally sensitive bluffs, a fence should be erected along the South side of Cobora Road to preclude casual walkers and their dogs.

**Response 109-5**

These comments are noted and will be incorporated into the Final EIR for review and consideration by decision-makers.

**Comment 109-6**

[ATTACHMENT: November 30, 1987 letter.]

National Audubon Society  
Western Regional Office  
555 Audubon Place  
Sacramento, CA 95825  
(916) 481-5332

30 November 1987

The Honorable Ruth Galanter  
Los Angeles City Council  
200 N. Spring Street, Room 333  
Los Angeles, CA 90012

Dear Councilwoman Galanter:

We would like to bring to your attention the ecological importance of the Westchester bluffs to the Ballona Wetland. As you know, we will be restoring the wetland after the Coastal Commission certifies the city’s Local Coastal Program. This restoration project is proposed in our Habitat Management Plan, which we submitted to the Los Angeles City Council on November 19, 1986.

We are aware that portions of the bluffs west of Lincoln Boulevard are currently being developed for single family residences. In addition there is a substantial amount of additional development proposed for the top and face of the bluffs west of Lincoln. The bluffs provide important habitat for wildlife which we will discuss further below. Due to their adjacency to the



wetland, we feel strongly that the bluffs should be preserved in their natural state as much as possible.

Complicating the preservation of the bluffs as a significant natural feature is the fact that the California Coastal Commission's jurisdiction includes only a limited portion of the bluffs. Therefore, it is necessary for the city to regulate the adjacent bluff lands outside of the coastal zone in order to protect the resource. Political boundaries do not comport with ecological relationships in the natural world.

The bluffs are environmentally significant both in their own right and because they are biologically related to the wetlands. According to Zedler (1984), "Restoration efforts must take into consideration the qualities of adjacent and upstream uses." For the restored Ballona Wetland coastal ecosystem to be self-sustaining, it must contain a diversity of habitat types, especially upland habitat areas which will be in short supply.

Dr. Ralph Schreiber, Curator or [*sic*] ornithology, Los Angeles County Natural History Museum and principal author of *The Biota of the Ballona Region, Los Angeles County* (1981), believes the bluffs are extremely important as habitat. According to Dr. Schreiber, the bluffs provide critical support habitat for the wetlands, especially for the birds of prey. The bluffs provide an elevational [*sic*] habitat gradient of upland vegetation. It is necessary not only to protect but enhance the native plant communities on the bluffs in order to build as much diversity into the coastal wetland ecosystem as possible. This diversity will in turn provide the basis for an ecosystem which can respond to environmental changes and still survive and in fact thrive.

Dr. Howard Towner, Professor of Biology, Loyola Marymont [*sic*] University, based upon fifteen years of experience teaching and collecting in the area of the Westchester bluffs, can corroborate Dr. Schreiber's observations about the ecological importance of the bluffs. Some of the animal-species Dr. Towner has personally observed include birds such as the Great Horned Owl, Barn Owl, Black-crowned Night Heron, California Quail, Red-tailed Hawk, and American Kestrel. In addition, he has observed reptiles such as the California Legless Lizard, Western Skink, and Black Bellied Slender Salamander. Common mammals include mice and ground squirrels. Towner points out that the bluffs represent a unique type of environment for the flight of larger birds such as ravens, hawks, and vultures by providing an updraft of wind for soaring. The bluffs also provide an important corridor for the east/west movement of animals. Our own observations are that the bluffs are not only a critical component of the Ballona coastal wetland ecosystem, but their preservation and enhancement have great environmental education value due to their rarity.

To summarize, the bluffs should be preserved, enhanced, and managed as a native community. They add to the habitat diversity and as such are linked to the adjacent wetlands biologically. The City should coordinate with the Coastal Commission, Audubon, local knowledgeable experts, and affected landowners as well as other interested members of the public and pass an effective bluff protection ordinance.

We would be happy to provide any additional information or assistance which you deem appropriate.

Thank you.

**Response 109-6**

This attachment was submitted in support of comments stated in Comment 109-5. As such, comments related to this attachment are addressed in Response 109-5.

**LETTER NO. 110**

Gunnar J. Holm  
7417 Henefer Avenue  
Los Angeles, CA 90045

**Comment 110-1**

I am writing to voice my concern regarding the establishment of 3 heliports in the Playa Vista development. Based on written summaries and conversations with Playa Vista representatives I have found that 3 permits have been issued to allow as many as 60 flights a day between the hours of 7 AM and 10 PM. This level of operation and their proximity to the Westchester Community will negatively impact the quality of life I have enjoyed. The noise associated with helicopter operations is well established and certainly diminishes the communities exposed to it.

I request mitigation to eliminate this threat to our community and its quality of life.

**Response 110-1**

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Section 15002 of the State CEQA Guidelines states that the basic purpose of CEQA is to inform governmental decision-makers and the public about the potential, significant environmental effects of a proposed project. No changes to heliport operations are proposed with implementation of the Village at Playa Vista, with the exception of the elimination of one heliport within the boundaries of the Proposed Project. Therefore, there would not be any impacts from heliport operations as a result of the Proposed Project.

Subsection 2.2.5 of Section IV.I., Safety/Risk of Upset, of the Draft EIR on pages 715-717 identifies two heliports currently permitted within the adjacent Campus portion of the previously approved Playa Vista First Phase Project. The Campus is envisioned to provide corporate headquarters-type facilities; as such, one or both of these heliports could become operational in the future to serve corporate executives. The impacts associated with opening one or more of the heliports at Playa Vista were addressed in the 1995 approvals of the Campus at Playa Vista, and are not an issue under consideration at this time. The study performed at that time, "Helistop Noise Study for Playa Vista," has been included in the Appendices of the Final EIR.

**LETTER NO. 111**

Carole Hossan  
7725 Hindry Avenue  
Westchester, CA 90045-3225

**Comment 111-1**

1. How would the proposed 6 lane road running along the bottom of the West Bluffs impact residents living above the Bluffs in terms of noise and air pollution?

**Response 111-1**

The commentator appears to be referring to Bluff Creek Drive, which would run at the base of the Westchester Bluffs through the previously approved First Phase Project and the Proposed Project.

An in depth analysis of potential localized construction and operational impacts related to the Proposed Project is provided in Subsection 3.4.1.2 (Local Construction Impacts) and Subsection 3.4.2.3 (Operational Local Impacts) of Section IV.B, Air Quality, in the Draft EIR. These analyses evaluated conditions atop the Westchester Bluffs as well as a number of other locations in the areas surrounding the Project site. As concluded in these subsections of the Draft EIR, no localized significant impacts (e.g., no exceedance of any health based standard) would occur as a result of the Proposed Project.

Operational impacts attributable to travel along Bluff Creek Drive (i.e., the proposed 6 lane road referenced in the Comment), are analyzed in terms of carbon monoxide (CO) concentrations per SCAQMD procedures and practices. The SCAQMD recommends analyzing CO in cases such as the Proposed Project as CO is the largest single constituent and is considered to be the best indicator to assess changes in pollutant concentrations attributable to mobile-source emissions. Furthermore, it is the only pollutant from mobile sources for which standardized modeling methodologies for estimating localized concentrations have been developed and approved by the SCAQMD.

The intersection of Bluff Creek Drive and Lincoln Boulevard was analyzed as it is the location with the highest potential to yield a CO hotspot along Bluff Creek Drive since it is the location with the highest Project traffic and level of traffic congestion. All other locations along Bluff Creek Drive are anticipated to yield CO concentrations that are lower than the Bluff Creek Drive and Lincoln Boulevard intersection due to relatively reduced traffic volumes and traffic congestion. CO concentrations at this, as well as all other analysis locations were analyzed relative to national and state ambient air quality standards.

Consistent with SCAQMD's CO modeling protocol, all four corners of the intersection were modeled using a receptor distance of three meters for the one-hour analysis and seven meters for the eight-hour analysis. As shown in Tables 17 through 20 of Section IV.B, Air Quality, of the Draft EIR, no significant impacts would occur at the intersection with the highest traffic volumes and worst level of service along Bluff Creek Drive (i.e., the intersection of Bluff Creek Drive and Lincoln Boulevard). As CO concentrations are lower when traffic volumes and congestion are reduced, no significant impacts would be anticipated to occur at any other locations along Bluff Creek Drive as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersection. Consequently, the residents living along the Bluffs overlooking Bluff Creek Drive would not be significantly affected by CO emissions generated by the net increase in traffic which would occur under the Proposed Project. As the Proposed Project or cumulative traffic does not cause localized air quality impacts related to mobile sources, emissions were therefore concluded to be less than significant for the Proposed Project.

With regard to noise levels, composite roadway noise impacts for locations atop the Westchester Bluffs was analyzed in the Draft EIR. Specifically, Section IV.E, Noise, of the Draft EIR in Table 77 on page 577 and Appendix H (Noise) of the Draft EIR provide the analysis of potential Project impacts. As detailed therein, worst-case roadway noise impacts attributable to the Proposed Project (that includes traffic volumes along Bluff Creek Drive) would be 0.3 up to 1.9 dBA, CNEL. As stated in Section IV.E, Noise, of the Draft EIR on page 553, "changes in a community noise level of less than 3 dBA are not typically noticed by the human ear."

Therefore, as discussed in Subsection 3.4.2.1.2 of Section IV.E, Noise, of the Draft EIR, the increases in traffic noise would not exceed the thresholds of significance and are not considered significant.

#### **Comment 111-2**

How would this road impact the wildlife of the area? How close would it be to areas that are supposed to be sanctuaries for animals?

#### **Response 111-2**

As demonstrated in Figure 4 of Section II.B, Project Characteristics, of the Draft EIR on page 155, the distance between the roadway and the proposed habitat areas within the Habitat Creation/Restoration Component of the Proposed Project would vary from 14 feet to 180 feet. The potential impacts of this road on the Habitat Creation/Restoration Component are evaluated in Section IV.D, Biotic Resources, of the Draft EIR, and mitigation measures are included in Subsection 4.0 of Section IV.D, Biotic Resources, of the Draft EIR, on page 551, to address those impacts.

**Comment 111-3**

2. As LAUSD has declined the site that Playa Vista proposed for a school to be built, what schools will the children who reside in Playa Vista attend? What impact will this cause in terms of traffic generated trips and classroom size at the affected schools? How will this impact be mitigated?

**Response 111-3**

As of this date, the LAUSD has not declined a school site at Playa Vista. As stated in their letter dated March 20, 2002 (included in the Final EIR Appendices), the Los Angeles Unified School District “has taken no action regarding the school site” at Playa Vista, discussions between the school district and Playa Vista “are ongoing,” and the district expects “a successful solution to meeting the school needs for the Playa Vista development will be reached in a timely and cooperative manner.”

As stated in Section IV.L.(3), Schools, of the Draft EIR, it is projected that the Proposed Project would generate 304 students within the attendance boundaries of Playa del Rey Elementary School, 145 students within the attendance boundaries of Marina del Rey Middle School, and 167 students within the attendance boundaries of Venice High School. The school-related vehicle trips that would be generated by the Proposed Project are part of the project trip generation presented in Subsection 3.4.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 859. The trip distribution component of the travel demand model used in the traffic study matched the project-generated school trips to the school locations in the vicinity of the project. Therefore, off-site traffic impacts associated with the project-generated school trips are encompassed within the traffic impact analysis conducted in Section IV.K.(1), Traffic and Circulation, of the Draft EIR.

With regard to the question raised regarding school facilities, Section IV.L.(3), Schools, of the Draft EIR on page 997 of the Draft EIR analyzes the Project’s potential impacts on public schools. The Los Angeles Unified School District (LAUSD) has established attendance boundaries for each of its schools. Based on information provided by the LAUSD, the Project site is currently located within the attendance boundaries of Playa del Rey Elementary School, Marina del Rey Middle School and Venice High School. These are the schools that would accommodate the Project’s school age children, notwithstanding inter-District transfers. While inter-District transfers are possible, they account for a very small percentage of the students attending any particular school. As such, schools other than the three noted above are not anticipated to be needed to accommodate the public school students generated by the Proposed Project.

**Comment 111-4**

3. Westchester will lose more of its neighborhood identity as sidewalks are reduced /trees removed by the widening of roads to accommodate the traffic generated by Playa Vista Phase 1 and 2. How can this loss of community quality of life be mitigated?

**Response 111-4**

None of the proposed roadway widening improvements would occur within the Westchester community. All of the roadway widening projects that are recommended as traffic mitigation measures for the Proposed Project are described in Subsection 5.8 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 937. The impacts of these off-site improvements are analyzed at the end of the Subsection 3.0 Impact Analysis within each Environmental Topic in Sections IV.A through IV.P.(3). As indicated in Subsection 3.4.5 of Section IV.G, Land Use, on page 650, these improvements would not cause the loss of any sidewalks and would improve the connectivity of sidewalks along Centinela Avenue. As indicated in Subsection 3.4.5 of Section IV.O, Visual Qualities, of the Draft EIR on pages 1181 and 1183, the amounts of landscaping affected would be less than significant and two mitigation measures are proposed for these impacts. One measure requires tree replacement on a one-to-one basis. The other requires landscaping plans to address affected landscaping.

**Comment 111-5**

4. If Mayor Hahn's Alternative D to the LAX Master Plan is implemented, how will it impact traffic flow to and from Playa Vista? What additional streets in Westchester/Playa del Rey will be impacted? What will the impact be? How will it be mitigated?

**Response 111-5**

Traffic impacts of and mitigation measures for LAX Master Plan Alternative D are the subject of separate environmental documentation prepared for the LAX Master Plan.

Nevertheless, the traffic study prepared as part of the Draft EIR analyzed potential impacts of the Proposed Project both with and without LAX Alternative D. Since LAX Alternative D is not an approved plan, the cumulative base traffic forecasts in the Draft EIR against which the Proposed Project's traffic impacts were assessed assuming growth of LAX to 78 million annual passengers (MAP) by 2010. A second analysis was conducted for an alternative cumulative baseline scenario with LAX Alternative D. This analysis is shown in Chapter IX of Appendix K to the Draft EIR, beginning on page IX-1, and concluded that the Proposed Project would have similar traffic impacts with LAX Alternative D as those identified in the body of the Draft EIR without LAX Alternative D. As indicated in Appendix K, the Proposed Project would not have any additional impacts under the LAX Alternative D scenario.

**Comment 111-6**

5. If there is a methane explosion at Playa Vista, the City of Los Angeles would be sued. What kind of insurance and how much will it cost to protect the City of LA in case such an unfortunate incident should occur. Would this cost be passed on to LA City residents? If so, approximately how much per person and/or household?

**Response 111-6**

The City is statutorily immune from tort liability under the California Government Claims Act, California Government Code Sections 810-996.6. Furthermore, expert review indicated the methane at the Proposed Project posed no health risk with the implementation of mitigation measures. See CLA report, Appendix J-6 of the Draft EIR.

**Comment 111-7**

6. Will the City be evaluating a No Project (or in this case, no Phase II) alternative? If not, why not?

**Response 111-7**

The Draft EIR provides a detailed analysis of the No Project Alternative in Subsection 4.1 of Section VII, Alternatives on page 1267.

**Comment 111-8**

7. What is the comparison between costs of impacts of Phase 2 development (air pollution/noise/utilization of water/electricity/development subsidies) vs. leaving the land as open space?

**Response 111-8**

A comparison of Alternative 1 (No Project/No Development) to the Proposed Project is provided in Subsection 4.1 (Alternative 1) of Section VII, Alternatives, of the Draft EIR on pages 1419 through 1422. Air quality, noise, water consumption, and energy impacts related to the Proposed Project are analyzed in Sections IV.B, Air Quality; IV.E, Noise, IV.M, Energy; and IV.N.(1), Water Consumption, of the Draft EIR, respectively.



**Comment 111-9**

8. What Phase 1 mitigations have not been completed yet? Can Phase 2 begin if mitigations for Phase 1 have not been completed? If so, how? Who oversees/enforces that mitigations are completed?

**Response 111-9**

Mitigation measures associated with the adjacent First Phase Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995. Completion of mitigation measures adopted in the certification of these documents is proceeding according to the Mitigation Monitoring and Reporting Programs adopted in conjunction with them, and is not under consideration in this EIR. Nonetheless, implementation of First Phase Project mitigation measures continues to comply with the requirements of the First Phase Project. The Proposed Project may be approved and construction may commence prior to completion of all mitigation measures required for the First Phase Project. However, the Proposed Project is required to comply with the terms and mitigation measures set forth in this EIR as well as any other conditions or approvals imposed on the Proposed Project.

**Comment 111-10**

9. How will Sepulveda Boulevard (Manchester/Lincoln) be affected? What impacts/mitigations will Phase 1 bring? Phase 2? What happens if these mitigations are in conflict with the Westchester/Playa del Rey Community Plan?

**Response 111-10**

The Draft EIR determined that the Proposed Project would have significant impacts during the P.M. peak hour at the intersections of Sepulveda Boulevard/Manchester Avenue, Sepulveda Boulevard/La Tijera Boulevard, and Sepulveda Boulevard/Westchester Parkway (see Figure 74 on page 867 in Subsection 3.4.5.1 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR). The mitigation measures proposed to address these impacts consist of providing funding for a new bus to provide additional service along Culver City Bus Line 6, providing funding for new buses to implement limited bus service between Fox Hills Transit Center and the Century Boulevard office corridor along the Sepulveda Boulevard corridor, and contributing to the design and implementation of the City of Los Angeles' Adaptive Traffic Control System (ATCS) at Sepulveda Boulevard/Manchester Avenue (see Subsection 4.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 893, 894, 896, 897, and 898). With these improvements, the impacts of the Proposed Project along Sepulveda Boulevard would be reduced to a less-than-significant level. Further, the Proposed Project's mitigation measures do not conflict with the Westchester-Playa del Rey Community Plan.

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995. The Draft EIR analyzed the traffic impacts of the Proposed Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area. Please see Topical Response TR-3, Related Projects, on page 453 above, for additional information.

### **Comment 111-11**

10. The community of Westchester/Playa del Rey was here before the Playa Vista project was proposed. It has suffered quality of life deterioration for years due to the encroachment of LAX. In the City of Los Angeles, Megaprojects are proposed without thought for the cumulative impact that they will have. Westchester/Playa del Rey is in a rather unique position in terms of being impacted by LAX, an economic engine for the City but not beneficial to the property values/quality of life of nearby residents, many of whom have lived in the community for decades. Phase 2 of Playa Vista will add an increasing burden. What can be done to mitigate the degradation of Westchester/Playa del Rey's quality of life due to the synergistic effects of growth at LAX/Playa Vista impacts? And if it can't be mitigated, why should it be allowed to proceed?

I appreciate the opportunity to present my concerns.

### **Response 111-11**

Subsection 6.0 of each environmental topic, Sections IV.A through IV.P(3) of the Draft EIR analyzes the Proposed Project's cumulative impacts inclusive of a list of 96 related projects. The related projects are listed in Table 5 on page 195, and their locations are illustrated on Figure 11 on page 194 of the Draft EIR. The LAX Master Plan Project has been included in the list and has been considered in all of the cumulative impacts analyses in the Draft EIR. (Please also refer to the relationship between the related projects and the Traffic analysis in Topical Response TR-3, Related Projects on page 453.) Pursuant to CEQA guidelines, mitigation measures are proposed in Subsection 4.0 of each environmental topic that mitigates the Proposed Project's impacts to the extent feasible. The LAX Master Plan Project is currently undergoing environmental impacts review. A Draft EIR was circulated in January 2001 and a Supplement to the Draft was circulated in July 2003. Review of that project is pending. The environmental analyses of the LAX project have included the Proposed Project as a related project in its cumulative impacts analyses. That project will be required to mitigate its impacts, to the extent feasible. Any residual significant impacts for either project would require a Statement of Overriding Considerations by the decision-makers, pursuant to CEQA.

It may also be noted that the Proposed Project would contribute several benefits to the Westchester Community. These include: (1) the redevelopment of a blighted, former industrial site; (2) traffic mitigation measures, particularly public transit improvements that would serve the community; (3) increased support for local businesses; (4) new on-site shops, restaurants and

parks that would serve neighbors; (5) bluff and riparian corridor improvements; and (6) water quality improvements that would serve Westchester areas as well as on-site areas.

**LETTER NO. 112**

Agnes Huff  
Ágnes Huff Communications Group, LLC  
Howard Hughes Center  
6601 Center Drive West, Suite 100  
Los Angeles, CA 90045

**Comment 112-1**

I am one of the lucky people in Los Angeles who lives close to where I work. Most people don't have that opportunity because home prices are too high and there are not enough residences to meet the demand.

The Village helps address that issue by providing up to 2,600 new homes. I understand that there will be a mix of apartments, condos and single family homes. In this part of Los Angeles--less than a mile from the beach--most developers would want to build the Valencia-style home (4-8 to an acre) and charge top dollar that most people could not afford. I think it is far more equitable to do what Playa Vista is planning--a mixed-use community with a wide selection at moderate price levels.

The City should approve The Village. It's a great project that meets many community needs.

**Response 112-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 113**

Sarah Hughes  
114 Montreal Street  
Playa del Rey, CA 90293

**Comment 113-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 113-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 114**

Michel Ingham  
123 Sunridge Street  
Playa del Rey, CA 90293

12.21.2003

**Comment 114-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 114-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 115**

Julie Inouye  
Michael W. Rubottom, M.D.  
6508 Vista del Mar  
Playa del Rey, CA 90293

**Comment 115-1**

(1) RE: VOTE NO ON PLAYA VISTA—Phase II

Dear Councilmembers and Planning Department of Los Angeles,

In 1992, I was appointed to Chair a committee that would look into the environmental and planning impacts of Playa Vista Phase I, by then Councilmember Ruth Galanter. As an ad hoc team of community and planning professionals we attempted in a short period of time to study the impacts on the environment and for the larger impact on the City of Los Angeles for environmental issues, traffic mitigations and infrastructure demands of a mixed use development, the largest of it's [*sic*] kind in the United States.

For eight years from 1987 through 1995, I was also an appointed member of the Westchester/Playa del Rey CPAC—Community Planning Advisory Committee.

Since I have intimate knowledge of this project and having been one of the last community leaders to oversee the entire project transition from the 1980's when Summa Corporation, David O'Malley was the President through Nelson Rising of Maguire Thomas Partners, then the Playa Capital investors of Morgan Stanley, Goldman Sachs, the infamous Gary Winick of Global Crossing and then president, Peter Dennison. Steve Soberoff, now sits in the leadership position acting as the current and most recent President, CEO of Playa Vista. To this date I have never been contacted by Mr. Soberoff personally.

With this intimate knowledge of how this development evolved for over two decades, I felt a responsibility to contact you and share this information.

Anticipating the loss of leadership and a development vision after Nelson Rising and Doug Gardner left the project, it became obvious that what the community thought we were collectively planning in the numerous charettes [*sic*] we participated in was not going to be.

Here is a letter to the editor that I wrote to the Argonaut newspaper June 4, 1998, publicly announcing a message to Playa Capital investors.

II—Playa Vista project built on communication

To the Editor,

Can you believe we are finally seeing some movement with the Playa Vista Project?

Thirteen years ago, (1985) in our living room, was the first presentation to us of the proposed Playa Vista project.

Unfortunately, that earlier group planning to develop Playa Vista did not have a pulse on our community, and with a lack of communication and a lack of agreeable concepts that relationship ended.

In 1989, the Vista del Mar Neighbors Association received the first phone call from representatives of Maguire-Thomas Partners, who had assumed the Playa Vista project.

With cool apprehension, we began a dialogue that in eight years would grow to become a mutual relationship based on trust and a shared vision of what we all wanted for this new city called Playa Vista.

The only way for a mixed-used project like Playa Vista to work with its many complexities—both its environmental responsibilities as well as speaking to the diversity of community needs—is by listening and learning from the people who live and breathe in the surrounding areas and who are raising their children here.

We have the pulse of the land and we are the people with the vested interests.

The developers may come and go but the community will always be here.

At the end of the day, it is the relationships that have been developed that will show the outcome of this unique city.

The day-to-day communications, like any marriage, will make Playa Vista a success or a failure.

The Vista del Mar Neighbors Association looks forward to building new relationships with the Playa Capital Investment Group and to see that the vision of this city will be one that we can all be proud of to leave as al [*sic*] legacy for many generations to come.

We all have a major responsibility to make sure that happens.

Julie Inouye  
Co-Founder of the Vista del Mar Neighbors Association  
Playa del Rey

A. Adjacent to the Wetlands

I am sorry to report that this letter was a prophecy of how this project would begin to unravel.



Now, twenty years later from our initial communication from the Summa Corporation, heirs of Howard Hughes family, this project is tragically doomed.

It became obvious to the entire community that when the first building, Playa Vista's Visitors Center went up we were in trouble.

The vision of great architecture and responsible mix use planning became a faint memory from almost a decade of sharing a similar vision in how this community could be.

With regret, we send you this letter to lend our support in voting NO on Playa Vista, Phase II.

**Response 115-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 116**

Nancee Inouye

**Comment 116-1**

This is in response to the above referenced Phase II development. I live between Alla Road and Centinela, north of the bike path in the Del Rey neighborhood. We held a homeowner association meeting with a couple of Playa Vista representatives on Tuesday, December 16.

After listening to the street developments that the Playa Vista group is planning to start doing on Alla Road and Centinela, I am asking that you please hold off on continuing with the Phase II development until our Del Rey neighborhood sees what the traffic impact it will have on our residential streets. As of right now, we are having difficulty getting onto Centinela during rush hour traffic. Furthermore, the two representatives during the meeting did not provide us with any answers on what the traffic impact will be on our residential streets in our neighborhood.

I would like to see another meeting on the above referenced issues before we go forward with the planned development.

**Response 116-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

In addition to the analysis described above, the transportation analysis included an evaluation of the locations where the addition of Project traffic might cause an impact on neighborhood streets. This analysis is discussed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 872-877. One of the four neighborhoods identified as a potential neighborhood impact area lies within the Del Rey Homeowners and Neighbors Association boundaries and therefore is eligible to participate in the neighborhood traffic mitigation program identified in the mitigation program. Participation is outlined on page 6 of the LADOT Assessment Letter in Appendix K-1, of the Draft EIR.

In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

**LETTER NO. 117**

Philip Jantaas  
3225 Malcolm Avenue  
Los Angeles, CA 90034

**Comment 117-1**

I hope you can help stop any more Playa Vista expansion, as the Westside is already overbuilt, and traffic has already overloaded both the freeways and the side streets. It's way past time for the building to stop. Please, let's save this last little speck of open space.

**Response 117-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Potential impacts associated with the Proposed Project on Land Use are addressed in Section IV.G of the Draft EIR, beginning on page 613. As discussed therein, the Proposed Project would be compatible with the land use/density designation in the Community Plan and Specific Plan, and the adopted environmental goals and policies of the community (page 647). The Proposed Project would integrate with and provide continuity with the adjacent portions of the Playa Vista First Phase Project lying to the east and west of the Proposed Project site, and would not adversely affect other surrounding land uses (page 648).

Potential traffic impacts associated with the Proposed Project are addressed in Section IV.K.(1), Traffic and Circulation, beginning on page 798 of the Draft EIR and Section II.15, Corrections and Additions, of the Final EIR. All significant traffic impacts associated with the Proposed Project can be mitigated to a less than significant level with the proposed traffic mitigation program.

In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

As discussed in Section III.A, Overview of Environmental Setting, of the Draft EIR, beginning on page 182, the Proposed Project site is not vacant, unused open space. In contrast, the site is currently used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, and since the 1940s has been part of an industrial

complex which housed the Hughes Aircraft operations. Because of historic and existing disturbances, only small stands of native plants remain on-site, and even these have a high proportion of non-native species. Due to the presence of a high percentage of non-native species and long history of disturbance, habitat within the site is highly fragmented and of marginal quality. No threatened or endangered species occur within the site.

**LETTER NO. 118**

Ryan Jamrog  
Corporate Relations Manager  
LMU Athletics  
One LMU Drive, MS 8235  
Los Angeles, CA 90045-2659

**Comment 118-1**

As I drive around Los Angeles' fringes, I see cookie-cutter neighborhoods; they have no style or character. At Playa Vista, however, I see diverse architecture, New Urbanist design and an innovative system of parks and open space. The City of Los Angeles should encourage this kind of project, and one way to do that is to approve The Village.

Like Playa Vista's first phase, The Village will be aesthetically appealing. Rather than looking like a monolithic mini-city, its varying styles will connote multiple neighborhoods.

Above the project, on the Westchester Bluffs, the homeowners will maintain their panoramic views, because there will be restrictions on the height of The Village's buildings.

Let's send Los Angeles in a smarter planning direction by approving The Village and more architecturally interesting projects.

**Response 118-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 119**

Carol Kapp  
127 Rees Street  
Playa Del Rey, CA 90293

**Comment 119-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 119-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 120**

Kevin Katz  
vinkman@earthlink.net

**Comment 120-1**

My name is Kevin Katz and I live in Venice California.

I just want to quickly state that I am opposed to any further development in Playa Vista.

I believe that the impact to surrounding communities has not been thoroughly investigated.

Already the traffic through the Lincoln corridor is in a state of gridlock. What will happen once the community of Playa Vista is fully inhabited?

I hear that there are also potential liabilities associated with the natural gas reserve that is below the Playa Vista Development.

This is one of the last open spaces on the West Side of Los Angeles as well as a rare and endangered wetlands habitat.

I urge you once again to re-think the consequences of the irreversible development decisions that you are making.

**Response 120-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 121**

Yates A. Keir  
108 Montreal Street  
Playa del Rey, CA 90293

**Comment 121-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 121-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 122**

Dr. Robert Kilroy  
2519 Cloverfield  
Santa Monica, CA 90405

**Comment 122-1**

The streets that run between Ocean Park and Pico, namely Cloverfield and 23rd continue to carry large amounts of traffic.

These speed bumps were installed to help provide safety for the region. However, since the installation of the speed bumps, I have not seen one traffic officer (other than parking) or any speed monitor on these streets. Cars, trucks and SUVs continue to fly up these [sic] freeways [sic] to the Freeway at speeds that well exceed the 25mph speed limit. Come sit and watch. You would be amazed at the speeds that cars truck and SUVs can develop between these bumps or fly over them at.

Given the speeds and volume of the vehicles on these streets and high density of families with young children on these streets and the presence of an elementary school less than a block away, you are flirting with tragedy if you do not work to continue to limit or at least slow down the traffic through this area. Should Playa Vista increase the traffic through this region it is even more incumbent on you to act to keep our neighborhood safe from this ever present and potentially disastrous traffic hazard.

I look forward to seeing you [sic] efforts in handling this matter

**Response 122-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. The commentor raises specific comments relating to the existing traffic conditions on Cloverfield and 23rd, between Ocean Park and Pico. Such traffic would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812.

The streets mentioned by the commentor appear to be within the boundaries of the City of Santa Monica. The traffic analysis presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, and Technical Appendix Volume 3 (Part 3 of 5) of Technical Appendix K of the Draft EIR determined that the Proposed Project would not have significant impacts at any of the 23 study intersections located within the City of Santa Monica under either the City of Los Angeles

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intersection analysis method and significance criteria or the City of Santa Monica intersection analysis method and significance criteria.

As a result of the State's acquisition of Area A and portions of Area B and the passage of SB 666, the Playa Vista Drive bridge and road extension to Culver Boulevard will not be constructed and is no longer a part of the baseline conditions for the year 2010. As discussed in Subsections 3.1 and 5.1.5 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 828 and 931, respectively, the Traffic Report included an analysis of the Proposed Project's impacts under the no Playa Vista Drive bridge and road baseline. Under either baseline scenario (i.e., with or without the Playa Vista Drive bridge and road construction), the analysis of traffic impacts within Santa Monica intersections is the same, and the Proposed Project would not result in any significant impacts at any intersections in Santa Monica. Please see Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472 for a further discussion.

In addition to the analysis described above, the transportation analysis included an evaluation of the locations where the addition of Project traffic might cause an impact on neighborhood streets. This analysis is discussed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 872-877. The analysis concluded that there would be no significant impacts due to the proposed project on neighborhood streets referred to in this comment.

**LETTER NO. 123**

Bev Klocki

**Comment 123-1**

As a longtime resident of Westchester and a former resident of Playa del Rey, I am so pleased that Playa Vista is finally being built. The homes are beautiful and the intelligent way in which the project has been planned will mean additional traffic improvements in the surrounding community as well as numerous new parks for my family to enjoy.

I am writing today to support the second phase of the project, The Village. Like phase one, I am certain that it will be well-planned and will offer a variety of amenities both to the residents who ultimately move there and those of us who live near Playa Vista in Westchester.

The Village is a great addition to what has already been approved and built, and I hope the City of Los Angeles will move forward to approve it quickly.

**Response 123-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 124**

Celia Knight  
1040 Victoria Avenue  
Venice, CA 90291

**Comment 124-1**

I am involved in two community organizations, Del Rey Homeowners and Neighbors and the Del Rey Neighborhood Council, and I have been following the progress on Playa Vista since I voted for Ruth Galanter shortly after Howard Hughes died.

I love the concept of The Village at Playa Vista! I haven't forgotten that the site was an industrial complex with 2 shifts of workers. I love the entire idea of the development having commercial and residential instead of just a mega-housing complex or a mega-commercial area where everyone would have to travel elsewhere.

The Village being a type of old-style European residential/retail/commercial mix will be a great buffer between Phase I and the commercial east end, and I appreciate that all the amenities there will be available to local residents also.

I'm not sure if the Freshwater Marsh is part of Phase I or Phase II, but it is delightful. I appreciate that there is a place in Playa Vista for the descendants of the very earliest residents of the area--even if most of them are transients.

**Response 124-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 125**

Stephen Knight  
12820 Short Avenue  
Los Angeles, CA 90066

**Comment 125-1**

I find the neighborhood protection plan in the E.I.R. to be lacking. The problems that will result from phase II and phase I will greatly affect the neighborhood [*sic*] immediately to the north of Playa Vista. When I say problems, I mean traffic in that neighborhood and loss of parking along Jefferson, Inglewood and Centinela.

**Response 125-1**

A neighborhood traffic impact analysis was conducted as part of the analysis of potential traffic impacts for the Proposed Project; the findings of this analysis can be found in Subsection 3.4.7. of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 872. The neighborhood traffic impact analysis concludes that the Proposed Project may have significant impacts on the residential neighborhood bounded by Inglewood Boulevard, Ballona Creek, Sawtelle Boulevard, and Bray Street/Port Road, and includes a mitigation measure to address these impacts (page 903). Please also See Topical Response TR-5, Neighborhood Traffic Impact, on page 458.

As discussed in Section IV.K.(2), Parking, of the Draft EIR beginning on page 943, the transportation improvement plan for the Proposed Project will not result in any loss of parking along Jefferson Boulevard, Inglewood Boulevard, or Centinela Avenue. Approximately 27 parking spaces along the east side of Centinela Avenue between the Ballona Channel and Culver Boulevard would be subject to peak hour parking restrictions, in order to increase capacity during peak hours along this roadway segment. Because other parking is available off of Centinela Avenue (i.e., on Milton Street, Havelock Street, Allin Street, Braddock Drive, Verdi Street, Wagner Street, and Culver Boulevard), the Draft EIR concludes that impacts on parking at this location are adverse but less than significant.

The comments is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 125-2**

Loss of parking along Jefferson will affect many business people to the extent that they may go out of business.

This loss of parking, and the delay in the project should require Playa Vista (Playa Capital) to renegotiate condition 125.

**Response 125-2**

Please refer to Response 125-1, above. Condition 125 is a condition of approval for the adjacent Playa Vista First Phase Project which requires funding of a Parking Replacement Trust Fund to address the loss of parking spaces resulting from First Phase Project traffic mitigations along Centinela Avenue, Inglewood Avenue, and Jefferson Boulevard, and is not part of the Proposed Project. As noted above, the transportation improvement plan for the Proposed Project will not result in any loss of parking along Jefferson Boulevard, Inglewood Boulevard, or Centinela Avenue.

**LETTER NO. 126**

Robert A. Krauch  
6633 Esplanade  
Playa del Rey, CA 90293

**Comment 126-1**

After including The Village plan in Playa Vista, nearly 70 percent of the total project will be devoted to parks and open space. That's an astounding number.

I served on the parks and open space sub-committee as part of the Westchester-Playa del Rey Community Plan Update—approved by LA City Council late this fall—after more than two years in the revision process. Most of the 30-member Plan Update Committee were very impressed with Playa Vista's coordinated, multi-use planning. Playa Vista's parks will vary in size and use, but its clear to me these many new parks and open space areas will offer a broad range of recreational experiences, social interaction and cultural opportunities.

These parks will be connected by a network of paths, sidewalks and nature trails. And, according to a recent Los Angeles Times article, the overall park system at Playa Vista is being designed by noted New York landscape designer Ed Schlossberg.

The Village alone will have more than 11 acres of recreational parks. There will also be bike lanes that connect to a larger system of bike trails and, even more acres of open space in the final segment of the riparian corridor.

The best benefit of all is that these parks will be open to residents beyond those actually living in the Playa Vista community.

I strongly urge support of the Phase II portion of Playa Vista as an attractive and practical "infill." The Village should encourage Playa Vista residents to walk more, use their autos less, and trade & recreate locally.

**Response 126-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 127**

Myra Kriwanek  
Neighborhood Council  
Westchester/Playa del Rey  
Public Safety Chair & Res. Dist. #7 (North Kentwood)  
6340 Riggs Place  
Westchester, CA 90045

**Comment 127-1**

I have lived in Westchester for over 20 years and own a home in North Kentwood. I have been an active community leader and have been a Board member of the Neighborhood Council of Westchester/Playa del Rey for the last year. I am responding to the Playa Vista Village EIR as an individual resident on my own behalf.

The following is a list of concerns which I would like to go on record should I need to refer to them in the future regarding the impacts of the Playa Vista project:

- 1/ PUBLIC SAFETY
- 2/ HEALTH
- 3/ TRAFFIC
- 4/ COMPATIBILITY and ELEVATIONS

**Response 127-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. This comment lists issues that are discussed and responded to below.

**Comment 127-2****1/ PUBLIC SAFETY**

As the Public Safety Committee Chair on the Neighborhood Council, I am aware of the need for providing more police officers in this area as Playa Vista adds to the increase in population and density. I am concern [*sic*] with the City of L.A. requiring adequate police protection and its ability to effectively protect and serve this vast area as well as the surrounding community. The law enforcement agencies are already strained and under staffed to handle the current increase in crime and security threat, especially located near LAX. The same comments extend to requesting more resources necessary to support the fire stations, emergency medical services, paramedics, ambulances, hospitals and trauma centers. Let me address the need for Playa Vista to compensate for increased police and fire services to maintain public safety. How can I be assured that Playa Vista's commitment to this need will be put into place before construction is permitted?

**Response 127-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR analyzes the impacts of the Proposed Project on Fire and Police services in Sections IV.L.(1) and IV.L.(2), respectively. As stated in Section IV.L.(2), Police Protection, of the Draft EIR on page 990. “The Proposed Project would generate revenues to the City which could be applied toward the provision of new police facilities, with related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the decision-makers. Since it cannot be guaranteed that the Proposed Project’s revenue contributions would be applied to police services, it is conservatively concluded that the Proposed Project’s demand may result in a substantial reduction in the service ratio, and impacts prior to mitigation would be significant.” A similar finding is made regarding Fire Services on page 975. As stated in Section IV.L.(1), Fire Protection, of the Draft EIR on page 976: “It is anticipated that the Proposed Project would be served by the new Fire Station located at Playa Vista Drive and Fountain Park Drive. No additional facilities would be required, and there would not be a significant impact. If this facility is not constructed or sufficiently staffed, a significant impact could occur.” Appendix The Draft EIR includes a contingency mitigation measure on page 980 that would be applicable if the new fire station were not built prior to the issuance of the first building permit for the Proposed Project.

**Comment 127-3****2/ HEALTH**

There are reports in the EIR referring to unhealthy, toxins which exist and must be monitored for environmental safety. There is large concern for full disclosure of any health risks and to hold Playa Vista responsible and accountable to control and mitigate any unhealthy conditions to protect the public. Likewise, any air and noise pollution arising from the Playa Vista project would be of concern to the community. What state department or city agency will investigate and review the health standards and what party will be held responsible for any liability due to unhealthy measures. Who will be upholding the laws to protect property owners, employees and the public should environmental hazards exist?

**Response 127-3**

The Draft EIR addresses in detail in Section IV.I, Safety/Risk of Upset, the potential impacts of the Proposed Project that relate to public health and safety. As indicated in Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 664, the RWQCB is the lead agency responsible for oversight of contamination issues, and corresponding health issues that are associated with man-made contamination at the Proposed Project site. With RWQCB oversight, residual chemical contamination from past industrial operations that occurred at the Proposed Project site

will be remediated to achieve protection of people that may live, work or recreate in the Proposed Project site from unacceptable cancer risks or non-cancer health hazards. As addressed in Section IV.I, Safety/Risk of Upset, worker safety is regulated by the federal occupational safety and health regulations implemented by the Occupational Safety and Health Administration (OSHA). A major component of the regulations is designed to promote worker safety and training. In California, Cal/OSHA is the agency that administers the safety and health regulations.

While regional air quality construction emissions would exceed SCAQMD regional significance thresholds, an in depth analysis of potential localized construction and operational air quality impacts related to the Proposed Project was provided in Subsection 3.4.1.2 and Subsection 3.4.2.3 of Section IV.B, Air Quality, of the Draft EIR. As concluded in these subsections of the Draft EIR, no localized significant air quality impacts (e.g., exceedance of any health based standards) would occur as a result of the Proposed Project.

As discussed in Subsection 4.0 of Section IV.B., Air Quality, of the Draft EIR, a comprehensive and strategic program of air emission control strategies is set forth in the Air Quality Management Plan for the Village at Playa Vista (Village AQMP). The Village AQMP is included as Appendix E of the Draft EIR. The SCAQMD has primary oversight of air quality issues in the Southern California area.

Noise impacts related to the long-term operations of the Village at Playa Vista are fully analyzed in Subsection 3.4 of Section IV.E, Noise, of the Draft EIR, starting on page 569. Based on the analyses contained therein, Proposed Project operations would result in a less than significant impact and as such, no adverse health affects from Proposed Project operational noise sources are anticipated. Noise issues will generally be regulated by the City of Los Angeles Noise Ordinance.

#### **Comment 127-4**

With the growing senior population of the elderly, the demand for more rest homes, senior centers, rehabilitation centers, parks and recreation and open space is advisable and most desirable.

#### **Response 127-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As described in Section II, Project Description, of the Draft EIR on page 166, the Proposed Project includes an option that would allow development of up to 200 assisted living units in-lieu of a portion of the proposed 175,000 square feet of office development. The impacts of such an exchange of uses are discussed within each environmental analysis in Sections IV.A through IV.P.(3).

**Comment 127-5****3/ TRAFFIC**

Traffic congestion, from accumulative surrounding effects, which Playa Vista, when built out will become a major contributor, is one of the worst problems to solve in this area around LAX and the 405 Freeway. There are too many problems to list here that will negatively impact the traffic conditions in this area. Further traffic studies will be necessary to address mobility at specific intersections and locations. Serious mass transit alternatives will become a must with future growth. I refer to additional studies and comments made by residential community groups to address the traffic impacts. I encourage community input and coordinating with the existing Westchester Streetscape Improvement Association.

**Response 127-5**

The project mitigation program is based on a comprehensive traffic analysis that studied the Proposed Project's impacts at over 200 intersections within a large study area. The study utilized the latest state-of-the-art transportation modeling techniques to identify and isolate the impacts of the Proposed Project on the transportation system. The project mitigation program mitigates the incremental impacts of project traffic through a program of physical improvements, traffic signal system enhancements, and mass transit improvements as called for in the comment. The Draft EIR traffic model is discussed further in Topical Response TR-1, Playa Vista Transportation Model, on page 445 above. The model and traffic analysis provided in the Draft EIR includes traffic projections for growth in the surrounding area, as discussed further in Topical Response TR-3, Related Projects, on page 453, above.

The comment is noted and will be incorporated into the Final EIR for review and consideration by the decision-makers.

**Comment 127-6****4/ COMPATIBILITY & ELEVATIONS**

The importance of keeping within the scope of compatibility among the surrounding neighborhoods will go a long way to create a successful and desirable project. Building heights below the view shed of the 100-foot bluffs are more acceptable from an aesthetic, protective and good-neighbor point of view of Playa Vista. A standard measurement from sea level should be established to determine the heights of the buildings to the buildable base.

**Response 127-6**

The Proposed Project's height limits are discussed throughout the Draft EIR, and are described as a measurement from sea level. See for example, Subsection 2.1.1.2.2.1 of Section II. B, Project Characteristics, of the Draft EIR on page 160 and Figure 6 on page 161. As indicated on Figure 6, the average height of the bluffs is approximately 140 feet above mean sea level (AMSL), and the highest buildings that would be permitted on the Project site would be

approximately 112 feet AMSL, approximately 28 feet below the average height of the bluffs. The view impacts associated with these height limits are analyzed in Subsection 3.4.2 of Section IV.O, Visual Qualities, of the Draft EIR, on page 1174.

### **Comment 127-7**

Any means to preserve and maintain the bluffs and bluffside, as well as protect the toe of the slope is essential to providing the essential buffer between Playa Vista and the Westchester community.

### **Response 127-7**

As indicated in Subsection 4.0 of Section IV.A, Earth, of the Draft EIR on page 266 and Appendix D-2 of the Draft EIR, the slope stability mitigation measures, as recommended by Group Delta Consultants, require the repair and maintenance of the bluff slope. As such, the requirement (as part of the approval of the Final EIR) to adhere to such slope stability mitigation measures would serve to preserve the bluff and maintain an effective buffer between Playa Vista and the Westchester community.

As described in Subsection 2.2 of Section II.B, Project Characteristics, of the Draft EIR on page 167 and illustrated on Figure 6 on page 161, the bluffs fall within the Project's Habitat Creation/Restoration Component. As indicated: "The Project's Habitat Creation/Restoration Component includes the construction of a 6.7-acre Riparian Corridor and the restoration and maintenance of a 5-acre portion of the Westchester Bluffs, located to the south of the Riparian Corridor. This component would be restricted from future development."

### **Comment 127-8**

I recommend the LA City Planning Department carefully consider the Westchester-Playa del Rey Community Plan as a guideline for enforcing appropriate zoning which protects the balance of land uses in the area. I request being informed in a timely manner of any zone change and/or plan amendment [*sic*] changes that are proposed on any of the Phases of Playa Vista which the Planning Department must decide on. I would like to be given the opportunity for public input in this process.

I support more neighborhood supported retail proposed in the Playa Vista Village. Not only for the convenience of close proximity and access for its own Playa Vista residents, but I would like to especially see more choice restaurants, coffee shops and bakeries, boutique stores and specialty food stores, as well as banks, savings and loans, pharmacies, card shops, beauty salons, barbers, cleaners, florists, travel agencies, etc.

In conclusion, the four areas of concern: public safety, health, traffic and compatibility/elevations are being addressed in my comments on the Playa Vista Village EIR. In consideration of a mega-development that will progress forward through the City's process of

building and planning, and will impact my neighborhood, I respectfully submit this letter for the record.

I would appreciate being kept up-to-date on public hearings about this project.

**Response 127-8**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Proposed Plan amendments are identified and analyzed in Subsection 3.4.1.1.4.2 of Section IV.G, Land Use, of the Draft EIR. Descriptive information regarding proposed plan amendments is provided in Section IV.G, Land Use, of the Draft EIR in Figures 53 and 54 and Table 88 on pages 637 through 639. Table 89 on page 640 compares land use features under the existing plans to those for the Proposed Project. As indicated in Subsection 3.4.1.1.4.2, the Proposed Project's regulatory impacts with regard to the Community and Specific Plans would be less than significant.

**LETTER NO. 128**

Jim Lamm  
10916 Braddock Drive  
Culver City, CA 90230-4211

**Comment 128-1**

Although I am president of Ballona Creek Renaissance, a Culver City-based 501(c)(3) nonprofit organization, I am providing you with a few comments as an individual. Also, by way of identification, I am a licensed architect (although not currently practicing). I'll start with some general remarks followed by some more specific ones.

Based on a review of a small portion of the extensive documentation at the local library and Online, I would like to make the following comments and suggestions. I realize that it [sic] possible these are addressed somewhere in the material and that I might have missed them. My hope is that Playa Vista can continue to evolve as much as possible into a part of our urban landscape that provides substantive environmental and social benefits and clearly and directly addresses and mitigates the significant and serious lingering concerns of many people in the surrounding communities and the environmental arena. If more of the proposed development can become open space, great. However, if the development occurs, it should be as sustainable and positive as possible.

Aside from the big picture question about whether or not development should occur in this particular location, I recognize and appreciate various environmentally good features, such as energy efficiency and use of recycled water and the provision of housing and jobs in close proximity to each other. However, I continue to hear concerns from many friends and associates, with much of their focus relating to the presence of methane and other gasses and to the impact of increased traffic on surrounding freeways, streets, and neighborhoods.

**Response 128-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The concerns raised in this comment are described in further detail, and responded to below.

**Comment 128-2**

Relative to Soil/Gas (Vol. 1, Book 2, Section I, Para. 2.2.4, page 700 and elsewhere), the document seems to cover the bases, but serious concerns by the Grassroots Coalition, Sierra Club and others linger. In order to provide solid assurance to all parties that the development is safe, I would encourage you to address these concerns as specifically as possible. If there are unaddressed problems or reasons to change course, it's best to learn that early. Based on my

direct professional experience with successful projects in gassy areas, I realize that gas usually can be dealt with, but each situation is different.

**Response 128-2**

Soil gas concerns are addressed in Topical Response TR-12, Soil Gas, on page 477.

**Comment 128-3**

As for traffic (Vol.1, Book 2, Section K-1, 2, & 3 and elsewhere), I would encourage you to strengthen your description of and proposals for alternative transportation. In addition to or in lieu of certain street intersection modifications and the like, consider bicycle and other linkages as mitigations and consider related commitments to active participation in efforts to provide rail options on the Westside, including connections to LAX, the proposed east-west Exposition Light Rail and Bikeway, and a possible north-south rail/bike/bus route in the vicinity of the Lincoln Boulevard Corridor. For bicycle commuting and recreation options, possible Playa Vista participation in connections to and improvements along the Ballona Creek Bike Path could provide significant benefit to the project and the surrounding communities. Figure 83 (page 959) illustrates a much more limited scope.

**Response 128-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, above, for information on the proposed transit plan, its components and its effectiveness. The Proposed Project will also include parks, sidewalks, bicycle lanes and other amenities including a substantial investment in transit infrastructure consisting of regional transit buses, transit priority systems, adaptive traffic control systems and an intelligent Playa Vista local shuttle system. The transit improvement program includes connections to regional rail, including the Metro Green Line Station to the south and the planned Exposition Light Rail Line to the north. Additionally, the transit improvements and enhancements provide connections to transit centers to facilitate coordinated transfers to bus lines operated by other providers.

**Comment 128-4**

The above limited comments and concerns notwithstanding, past and ongoing efforts by Playa Vista (and the City of Los Angeles) regarding Ballona Creek and its watershed are much appreciated. While much could be said about the various alternative scales of development, I am not in a position to address those and other important issues. I hope these comments are constructive and I'll look forward to reviewing the resultant documentation. And with the just completed transfer of significant lands to the State, I also look forward to participating in a small way in the renewal of the wetlands and open space resources.



**Response 128-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 129**

Angela Lee  
4046 Tivoli Avenue  
Los Angeles, CA 90066

**Comment 129-1**

I feel that allowing the Playa Vista Phase II project to go forward is a very poor idea. I live in the Del Rey area and already have to contend with the terrible traffic on Lincoln Blvd. I am concerned that a development the size of Playa Vista Phase II will cause more gridlock on Lincoln and Centinela and will result in cars detouring through residential streets. Please demand a thorough assessment of the traffic impact of Playa Vista.

**Response 129-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1) of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15 of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response No. TR-1, Playa Vista Transportation Model, on page 445, above.

In addition to the analysis described above, the transportation analysis included an evaluation of the locations where the addition of Project traffic might cause an impact on neighborhood streets. This analysis is discussed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on pages 872-877. One of the four neighborhoods identified as a potential neighborhood impact area lies within the Del Rey Homeowners and Neighbors Association boundaries and therefore is eligible to participate in the neighborhood traffic mitigation program

identified in the mitigation program. Participation is outlined on page 6 of the LADOT Assessment Letter in Appendix K-1, of the Draft EIR.

In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

**LETTER NO. 130**

Hyun Gwon Lee  
Lee & Co.  
3660 Wilshire Boulevard, #936  
Los Angeles, CA 90010

**Comment 130-1**

Despite arguments to the contrary, people will use public transit as long as it is clean, well-maintained and goes somewhere they want to go--regardless of their socio-economic status. Just because you have a car doesn't mean you will use it for every trip, especially if there is a convenient alternative. I think of the public transit that serves Laguna Beach, especially during the annual Festival of Arts, and I know that those shuttles are packed.

It is possible for the City to approve a project that would use such a shuttle every day of the year. The Village at Playa Vista would provide a shuttle to deliver residents, like me, from our homes to the office buildings at The Campus portion of the project and to important destinations outside the project, including Howard Hughes Center, Fox Hills Mall and Marina del Rey.

I think I speak for everyone at Playa Vista when I say that it would be refreshing to leave our cars behind and ride the shuttle to work or to do our shopping. The shuttle system at Playa Vista could be a model for other such systems throughout the City, and I urge the City to support this cutting-edge project.

**Response 130-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 131**

Sue Levitt  
12580 Rosy Circle  
Los Angeles, CA 90066

**Comment 131-1**

Demographers predict a huge increase in population in Southern California over the next 20 years. Some have estimated the increase to be as large as “two Chicagos.” Where are we going to house all these people?

I believe it is important to create new housing in urban areas, rather than continuing down the path of urban sprawl. Urban sprawl takes people farther away from their places of employment and creates undo strains on the regional transportation system.

The Village at Playa Vista is an example of smart planning and smart growth. It provides for 2,600 new residential units, neighborhood retail stores within walking or shuttle distance to residents, and the opportunity for people to live and work in the same community.

Unfortunately, this is a novel concept for Los Angeles, and one that should be replicated as much as possible to accommodate the population growth that is coming. The Village is a smart concept, well-reasoned and a model. It is deserving of the City’s support and approval.

**Response 131-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 132**

Lance Lipscomb  
Westchester Resident

**Comment 132-1**

Conversations about the sprawl of a city, Los Angeles is general the first example cited. The concept of building communities from within our city borders rather than continuing to consume the out laying landscape seems to be beyond the grasp of most city planners and developers. However, Playa Vista is an example of a community that has been masterfully designed to thrive within the metropolis of Los Angeles.

The developers have learned their lessons well from other less desirable projects. They have taken an abandoned airstrip and manufacturing facility and turned it into a viable community. The new homes are artistically crated and wired for the latest in technology. Instead of expansive garages, cars are parked underground. There are people who oppose any change. Their issue is not whether a project is beneficial only that it involves change. Playa Vista is a great place and a model for cities short on housing.

The Village is a critical feature of the immerging community. With its mix of housing, retail, office and open space, it will allow Playa Vista to become a true mixed-use community. Without The Village Playa Vista will be just another housing project. Compromises area part of living in this city. There are realities of city life in the 21 Century that we may not like; however, they are realities to which we have to identity new solutions. We need to be willing to live closer together. We need to use public transportation. We need to be content with parks, rather than a personal year. Playa Vista vision has been to address these issues and create a visionary neighborhood that is attractive, with open spaces and self contained.

The Village only builds on what is already a great place. I urge the City of Los Angeles to approve the plans.

**Response 132-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 133**

Jocelyn and David Lutzky  
5801 Kiyot Way #10  
Playa Vista, California 90094

**Comment 133-1**

Would you build a school without a playground or a house without a bathroom? Then why on earth would you consider building a housing development without a retail center?

The two go hand in hand. The businesses in the retail center will feed off the residents; and the residents will find the convenience of the retail center irresistible. Better still is the fact that while the residents are doing their shopping and the businesses are making money, the people in the surrounding community remain unburdened by the traffic that would otherwise be seeking out these services elsewhere.

We moved to Playa Vista for a new sense of urban living. Part of that was the promise of the shops and restaurants that will be part of The Village and the prospect of being able to walk to the corner restaurant on a Saturday morning and read the paper, drink a cup of coffee and watch the world go by.

The Village is a wonderful concept that should be replicated elsewhere. It provides a town center that will be the heart of our community.

**Response 133- 1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 134**

N. Challis Macpherson  
738 Howard Street  
Venice, CA 90292-5515

**Comment 134-1**

The Village at Playa Vista will create not only thousands of new construction jobs, but it will very likely create hundreds of new careers as well.

As you may be aware, the construction industry can be difficult to break into, especially if you are faced with obstacles such as prior drug use or incarceration that make it difficult to get past the job interview stage. Playa Vista, however, has set the bar high by agreeing to reserve a significant percentage of its construction jobs for at-risk youth and adults through the Playa Vista Job Opportunity and Business Services (PVJOBS) program.

This commitment is nothing short of spectacular because it means that at-risk adults who might otherwise turn back to their gang or drug lifestyles have a light at the end of the tunnel. The Village will create new jobs for them, but once the project is completed, these people will have learned a trade, been accepted into the union and have outstanding prospects for future work.

In this way, The Village and Playa Vista are about more than building new homes; they are about building new lives. I am writing to support The Village because it will make a difference in the lives of hundreds of people and their families long after it is built.

I am one of the original community activists that negotiated a jobs training program with Playa Vista some ten years ago. This company has never ceased working with us toward a viable program that guaranteed no less than 10% of the construction jobs at Playa Vista went to multi-barriered local people. Our success rate is amazing. Please contact me for details. I am always happy to talk about PVJOBS.

**Response 134-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 135**

Jayne Major  
Breakthrough Parenting Services  
12405 Venice Boulevard, #172  
Los Angeles, CA 90066

**Comment 135-1**

I live near Playa Vista and the traffic is getting worse and worse.

Please do what you can to minimize the impact to traffic; we are approaching gridlock.

**Response 135-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1) of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15 of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

**LETTER NO. 136**

Glenn Marzano  
Glenn Marzano Photography  
Post Office Box 12407  
Marina del Rey, CA 90295

**Comment 136-1**

I am proud to say that I am a resident of Playa Vista.

I am one of the few people in Los Angeles who actually doesn't mind their commute. I work just a few minutes from my new home at Playa Vista, so unlike most people, I don't even have to get on the freeway to get to and from work.

While a commute like that is an anomaly in LA., Playa Vista is helping to make it more common for people to live close to where they work. I work with many people who live in places like Santa Clarita and Long Beach because there is no new housing for them on the Westside.

The Village plan, however, would add additional housing to Playa Vista and encourage people to move closer. The Village will also include neighborhood stores and cafes that we can all walk to. I am hopeful that The Village will be like neighborhoods back East and in the Midwest, where neighbors meet for coffee in the morning and bump into each other in the local market while getting their groceries.

I hope you will support this project and recommend to the City Council that it be approved.

**Response 136-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 137**

Sylvester Matthews  
425 West Regent Street, #12  
Inglewood, CA 90301

**Comment 137-1**

The Playa Vista community has been a wonderful addition to the area. The developers' attention to creating open spaces, preserving wildlife and providing residents with beautiful, environmentally friendly homes has set an example that I hope will become a standard for the future in our city.

I therefore look forward with great anticipation to the beginning of the next step-the Village. This phase promises to continue what was started by the residential project. The Village will provide area residents with a grocery store and other service related businesses, retail shopping, restaurants and more, reducing traffic and pollution, as the need for car trips to other neighborhoods is eliminated.

I strongly urge the City to approve the Village and complete what is becoming a model community for Los Angeles.

**Response 137-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 138**

Jeffrey McLean  
4400 Westlawn Avenue  
Los Angeles, CA 90066-6140

**Comment 138-1**

My wife and I live in the neighborhood west of Centinela just south of Washington. We have many concerns about the additional traffic that the Playa Vista projects are contributing through our street. When we bought our house 2 years ago we thought it would be a good place to begin raising a family, now we are not so sure. With a baby on the way I am saddened every time I see a car race down our street, an occurrence that is happening more and more frequently.

With all of the remaining land intended to be developed, there is a great potential impact on both my family's way of life and on the value of my property. I feel that there is nothing I can do to stop the inevitable save for letting my voice be heard.

**Response 138-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 138-2**

1) Please require traffic impact studies to the surrounding neighborhoods prior to any additional development.

**Response 138-2**

A neighborhood traffic impact analysis was conducted as part of the analysis of potential traffic impacts for the Proposed Project. The findings of this analysis can be found in Subsection 3.4.7 of Section IV.K(1), Traffic and Circulation, of the Draft EIR, beginning on page 872. The neighborhood traffic impact analysis concludes that the Proposed Project may have significant impacts on four residential neighborhoods, including the neighborhood bounded by Inglewood Boulevard, Ballona Creek, Sawtelle Boulevard, and Bray Street/Port Road, and includes a mitigation measure to address these impacts (page 903). Please also see Topical Response TR-5, Neighborhood Traffic Impacts on page 458, above.

**Comment 138-3**

2) Please install speed bumps on our street, Westlawn Ave. between Short Ave. and Louise Ave. See the map below:

**Response 138-3**

The Draft EIR measured the impact of Proposed Project traffic on the street system in the area. Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presented an analysis of potential neighborhood impacts that could be caused by project traffic, and the intersections listed in this comment were not found to be among the areas of potential impact. In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means. See Topical Response TR-5, Neighborhood Traffic Impacts, on page 458 above.

The request for speed humps on Westlawn Avenue will be forwarded to LADOT for consideration.

**Comment 138-4**

ATTACHMENT

See following page.

[http://maps.yahoo.com/maps\\_result?ed=PaHeZ.p\\_0TptY7.8Cd34wVAkShBRbA--&csz=90066&country=us&resize=s](http://maps.yahoo.com/maps_result?ed=PaHeZ.p_0TptY7.8Cd34wVAkShBRbA--&csz=90066&country=us&resize=s)

**Response 138-4**

This attachment was submitted in support of comments stated in Comment 138-3. As such, comments related to this attachment are addressed in Response 138-3, above.

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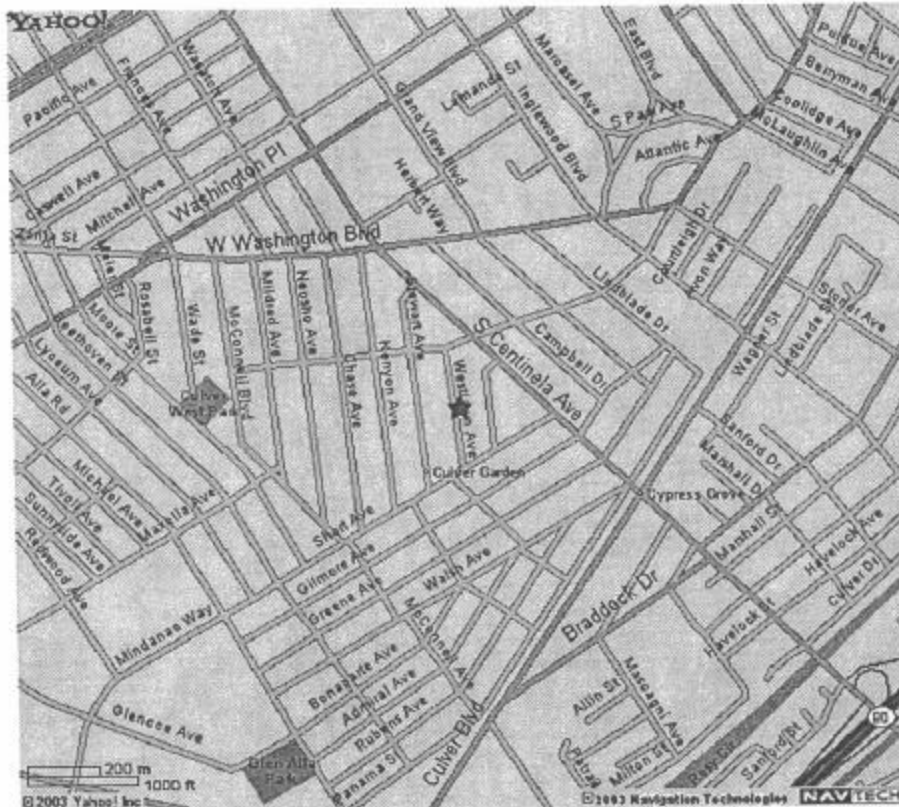
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★ 4400 Westlawn Ave  
Los Angeles, CA 90066-6140



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h h c c g e e

**LETTER NO. 139**

Sandy Medrano  
13163 Fountain Park Drive, #B-130  
Playa Vista, CA 90094

**Comment 139-1**

As a resident of Playa Vista, I am enthusiastically looking forward to the beginning of Phase Two—The Village. Smaller than originally planned, the Village promises to provide us with restaurants, cafes, a market and retail that will enable us to shop without a commute! The office space and the residential areas of Playa Vista will be mutually beneficial, each creating a draw to the other—the residential apartments and homes will be attractive to people coming to work in the office park, while demand for the available office space will surely increase as a result of people moving in to live!

The Village at Playa Vista will complement the residential community perfectly, creating a model for what Los Angeles of the future can be at its best! I encourage the City to join me in supporting this wonderful project by approving its next phase.

**Response 139-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 140**

Irene Meltzer  
12547 Mitchell Avenue  
Los Angeles, CA 90066

**Comment 140-1**

As 15 year resident in both Venice and Mar Vista, I have become increasingly distressed by the poor public planning in the surrounding neighborhoods. As examples:

Culver City shoved Cost Co on Washington Blvd (off Lincoln) with no perceptable [*sic*] traffic mitigation causing weekly traffic accidents and crawling traffic. Rampant over-building of the Marina area, has caused some of the worst traffic in LA off Lincoln Blvd. I live off Centinela which has now become the defacto highway to Playa Vista and is a traffic nightmare. My commute has increased by 20 minutes due to the traffic on Centinela. The quality of life in the Marina area is steadily decreasing.

The worst is yet to come with phase two of Playa Vista. There is no way you can mitigate the effect of thousands of more people in this small area. We're already seeing an increase of cars using our street to avoid the Washington/Venice intersection, creating dangerous situations for kids in our neighborhoods.

It is the responsibility of the city council to look after the best interest of the tax-paying citizens, not just deep-pocketed, well-connected developers. I urge you to do a comprehensive and thorough study of the traffic impact Playa Vista will have on our neighborhood streets. This area is becoming unbearable.

**Response 140-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. The commentor raises specific comments relating to the existing traffic conditions. Such traffic would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812. A new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With mitigation, the Proposed Project would not result in any significant traffic impacts.



The Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed therein, a total of four neighborhoods were identified as having potential significant neighborhood traffic impacts as a result of the Proposed Project, and would be eligible to participate in the neighborhood traffic mitigation program identified in the mitigation program.

**LETTER NO. 141**

Cheryl Mitchell  
714 East 92nd Street  
Los Angeles, CA 90002

**Comment 141-1**

Los Angeles has been described as “parks poor.” Playa Vista’s plan for The Village helps improve the situation. The Village will contain over 11 acres of recreational parks and bike lanes. Twelve more acres of open space will provide improved habitat for plants and wildlife.

Having The Village will not suddenly make Los Angeles “parks rich,” but it will be a significant contribution to the city. Please support Playa Vista’s plans.

**Response 141-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 142**

Ross Moen  
4707 La Villa Marina, #D  
Marina del Rey, CA 90292-7011

**Comment 142-1**

The current master plan for Playa Vista is significantly smaller in size and scope than the original plan envisioned more than a decade ago, so the construction's impacts on air quality will be proportionately smaller. To minimize these impacts, Playa Vista says it will use equipment and technology to control emissions, water construction sites to help control dust and hire an air quality monitor to oversee the project.

The comprehensive transit program will further reduce pollutant emissions and create opportunities for increased bus ridership, bicycling and walking. Design features of The Village, similar to Playa Vista's first phase, will promote energy-efficient appliances and lighting in all residences.

These are outstanding and progressive measures that will minimize impacts to air quality. I love living by the beach and enjoying the fresh sea breeze. It's nice to know that Playa Vista values clean air as much as I do, and is taking extraordinary measures to keep it that way.

**Response 142-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 143**

John Monaghan  
121 Sunridge Street  
Playa del Rey, CA 90293

**Comment 143-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

Thank you for your consideration.

**Response 143-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 144**

Faridah Monghate  
13000 Washington Boulevard  
Los Angeles, CA 90066

**Comment 144-1**

I am writing to urge the City of Los Angeles to approve the Environmental Impact Report for The Village at Playa Vista. In particular, I support Playa Vista's plans to protect local and regional water quality.

Playa Vista has designed an innovative system that collects water runoff from the development and its neighbors, to protect the wetlands in the area and the Santa Monica Bay. An attractive habitat for wildlife, the freshwater marsh system doubles as a natural water filter.

The Village design contains several features to complete the system. Acreage within The Village will fully connect the Riparian Corridor, linking it to the marsh. Rooftop drains and other upstream measures will filter the water before it enters storm drains. Underground parking will minimize pollutants. Native landscaping will reduce the need for irrigation. These are smart measures, and there are many more in the Village EIR.

**Response 144-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 145**

Jeanne Moody  
7023 Trolley Way  
Playa del Rey, CA 90293

**Comment 145-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 145-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 146**

Christopher Moore  
205 Rosecrans Place  
Manhattan Beach, CA 90266

**Comment 146-1**

I am writing to submit my comments regarding the Draft EIR for Playa Vista Phase II (EIR No. ENV 2002-6129 EIR).

As a resident of the South Bay, it appears that our communities will be spared direct impact of both the proposed project and of many of the mitigation efforts. However, my daily routine takes me through the very heart of the project and as such I imagine that I will experience quite a bit of disruption and delay if this project is to be approved. I am sure that many, many other area residents will be similarly affected.

I would encourage the City Planning Department to pursue “Alternative 1: No Project - No Development”. Los Angeles County is highly stressed in its infrastructure already. A glance at Book 2, Table 116 “Freeway Operating Conditions - 2003 Base” shows that, today, a large part of our freeway system is already operating at low levels of service, many segments rating a grade of D or worse. At this time, the majority of Playa Vista Phase I is still unoccupied; once those thousands of individuals join the many current, surrounding-area residents, how much of the nearly exhausted capacity of our roads will be left for those that will live in Phase II?

I ask that the City Planning Department use some common sense when looking at this project proposal. Los Angeles cannot accommodate the people that are already living here—we are in already overloaded lifeboats. Rather than laboring to make the Westside more attractive to prospective residents, why not do something to improve the quality of lives of those that are here now? Please say no to the second phase of Playa Vista and the disruption, dust, traffic, people, and pollution it will bring. We have enough of that here already.

Give us a little bit of freedom here on the Westside and say to Playa Vista, “No Project - No Development.” We shall be all the better for it.

**Response 146-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The topics of dust and pollution are addressed in Section IV.B, Air Quality, of the Draft EIR beginning on page 270. The topic of traffic is addressed in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798.

**LETTER NO. 147**

Dana Morgan  
8500 Belford Avenue  
Los Angeles, CA 90045

**Comment 147-1**

As a 20 year resident of Westchester I would like you to consider less housing and road building at Playa Vista and more public acquisition of land. Clearly, the approval of Phase II will add to the already crowded roadways on the west side and will encourage even more traffic to migrate onto our local residential streets. We have suffered from the building of the Hughes Center, from the increase in LAX airport traffic. Many of our local streets are becoming unsafe because of cars cutting through the residential [*sic*] neighborhoods of Westchester. The bottom line is that the Playa Vista Project will increase traffic to unacceptable, and illegal levels at many intersections. Please review the facts about traffic mitigation very carefully. My research into the traffic [*sic*] issue shows that spokepeople [*sic*] for Playa Vista have not been totally truthful when analyzing the effect of the increase of car trips that might be the result of Phase I and II. The false belief that Playa Vista residents will use public transportation instead of their private cars must be addressed.

**Response 147-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1) of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.



The proposed transit enhancement mitigation measures are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of other transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the proposed mitigation would be effective to reduce potentially significant impacts to less-than-significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections.

**Comment 147-2**

Instead of approving Phase II, even at the smaller, cleaner levels suggested by Playa Vista, why not make a positive and courageous step toward conservation and restoration. The environmentally wise decision would be one that serves the needs of all affected constituents: humans and non-humans alike. A decision to bring more public parks and green space for residents on the west side would be a decision for health of the entire 100 mile radius which has been researched as part of the EIR. The ocean, the wetlands, the uplands, and all the people would benefit from 250-300+ acres [sic] in Area D - including Phase 2 lands put into the Public Trust. Please consider this alternative. Review the environmental [sic] impact of parkland and greenspace in contrast to more housing, more car trips, more pollution.

My children and grandchildren's grandchildren will forever thank you for taking a step in the right direction, a step to block Phase II. We need to restore the wetlands area to its previous beauty. It can be done with your help.

**Response 147-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

Section VII, Alternatives, of the Draft EIR, starting on page 1258, analyzes a range of alternatives to the Proposed Project, and identifies alternatives considered but rejected in Subsection 3.2 on page 1262. As described, therein, a regional park/habitat restoration alternative was discussed, but not pursued further as analysis of such an alternative is not appropriate per Section 15126.6(c) of the CEQA Guidelines. As described in Section 15126.6(c), the reasons for rejecting alternatives from detailed consideration include the following: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts.

**LETTER NO. 148**

Ingrid Mueller  
1027 Elkgrove Avenue  
Venice, CA 90291

**Comment 148-1**

It is difficult to hold back disagreements and anger after soooo many years of opposition to PV.

Although we were promised that the DEIR for Phase II would not be published before Phase I was completed...yet here are 1,500 pages of detailed jungle to stumble through at year's end—indeed, what's the big hurry????!

All obvious protests, like traffic congestion and air pollution, will arrive on your desk in piles, and no mitigation will change our resolve.

Here in Venice, we know that thousands of newcomers would enjoy the beach areas, if only there were shuttles provided by the 'owners', for instance, and no taxes were spent on additional 'public' transport.

Here in Venice, we already smell the crawling traffic on Lincoln Blvd...and this is supposed to be the West Coast's last, all inclusive, beach city with public access! Already a shifting dream... If more mega-boxes and homes were to rise in our Ballona Wetlands, plenty of 'dreams' would be doused, killed, and that goes for the spirit of our neighborhoods as well. Why continue to live here?

Whatever you can do, dear Councilwoman, please DO DO IT! Our Grassroots Venice Neighborhood Council's LUPC will join other surrounding NCs in your district in their PV opposition.

Please DO voice the deeply felt and researched concerns of your constituents!

Please DON'T allow that falsely calculated population increase over the next couple of decades for you to succumb to pressure and burning greed and a dozen LA neighborhoods's [*sic*] seriously impaired quality of life!

Your serious and honest consideration is truly appreciated.

**Response 148-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project. A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts. The Draft EIR identifies residual significant impacts on regional air quality emissions from both Project construction and Project operations. The Playa Vista First Phase Project will include the provision of a beach shuttle service on summer weekends. This service will be available to Project residents and visitors and will serve to reduce the impact on beach and coastal resource parking demand. The shuttle system would be expanded under mitigation measures identified in the Draft EIR for the Proposed Project. The Proposed Project includes no development in the Ballona wetlands.

**LETTER NO. 149**

Laura Munsterteiger  
2302 Aviation Boulevard, #A  
Redondo Beach, CA 90278

**Comment 149-1**

I am routinely baffled by how many hoops a good development must jump through before being approved. Los Angeles has gone out of its way, it seems, to discourage good developers from building the housing we desperately need.

At Playa Vista, for example, the developer has crafted a wonderful vision for how new housing can address environmental concerns, incorporate an enormous amount of open space and make a dent in the jobs/housing imbalance. Yet, Playa Vista is routinely attacked by those who would prefer that nothing be built on the eyesore that is the old Hughes Aircraft site.

I believe, as do many of my friends and neighbors, that it is high time that Playa Vista is built. Please look at the many regional and local benefits this project will provide. Thank you.

**Response 149-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 150**

Richard S. Musella  
6383 West 80th Street  
Westchester, CA 90045

**Comment 150-1**

The Village will continue Playa Vista's commitment to the environment and balancing the critical need for housing with the protection of the environment. This commitment is an extension of important environmental work already underway, including the creation of the Freshwater Wetland System that is creating and protecting habitat and treating stormwater before it enters Santa Monica Bay.

The Freshwater Marsh (FWM), constructed as part of the Playa Vista's First Phase, is designed to both establish new wetlands habitat and to function as a buffer to protect the salt marsh from impacts from upstream urbanization. Previously contemplated development, which was greater than The Village project is today, was taken into account in the design of the FWM.

Resources in the area will benefit from the fact that The Village proposes no development west of Lincoln Boulevard or north of the Ballona Channel. In connection with The Village, Playa Vista will complete the Riparian Corridor of the Freshwater Wetland System and restore the Westchester Bluffs east of Lincoln. Approximately 12 acres of the 111 acres in the Village will be habitat creation or restoration. Overall, I believe the Project will be an improvement to habitat and benefit the local wetlands system compared to what exists today.

I am a forty year resident of Westchester and strongly support The Village.

**Response 150-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 151**

Richard Nickey  
110 Rees Street  
Playa del Rey, CA 90293

**Comment 151-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 151-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 152**

Guy Nicolet  
13075 Pacific Promenade, #112  
Playa Vista, CA 90094

**Comment 152-1**

As a homeowner at Playa Vista, I wanted to stress the importance of The Village to the community. The Village is not only an asset to the residents of Playa Vista, but also to the surrounding communities of Venice, Playa del Rey, Marina del Rey and Westchester.

The Village will provide the community with a town center - filled with restaurants and stores and open areas for people in the community to gather. The Village will provide the residents of Playa Vista and surrounding neighborhoods with a special place close by to eat and shop which will unburden our local roads with additional traffic.

Public transportation will also be available to and throughout The Village via the addition of new bus lines and a shuttle system connecting The Village with key local destinations such as Fox Hills Mall, Howard Hughes Center, Marina del Rey, UCLA and Century City.

The Village is a much-needed addition to the community and I urge the City of Los Angeles to support the project to its fullest extent.

**Response 152-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 153**

John W. Nugent  
7335 Vista del Mar Lane  
Playa del Rey, CA 90293

**Comment 153-1**

As part of The Village project, five acres of the Westchester Bluffs will be restored, with native coastal sage replacing non-native grasses and iceplant. This improvement will make the bluffs more stable, and will be far more attractive than what exists today.

At the base of the bluffs in The Village area will be a riparian corridor that will include more native habitat and walking trails. I understand that this area will be accessible to people living outside Playa Vista. What a nice improvement to the area and one that will be enjoyed by residents like me.

My wife and I have had the opportunity to stroll along the freshwater marsh, and look forward to expanding that walk to include the riparian area. We look forward to looking up, and seeing the bluffs greatly improved. Better yet, we look forward to strolling over to a coffeehouse in the Village for a cup of coffee before resuming our walk.

The Village is a win-win proposal in that it provides important environmental improvements to the bluff and riparian corridor while providing walking and exercise trails to local residents like us.

**Response 153-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 154**

Patrick O'Neill  
3868 East Boulevard  
Los Angeles, CA 90066

**Comment 154-1**

The Village at Playa Vista is an important continuation of a much-needed project in our city. While building on Playa Vista's commitment to protect plants and wildlife, air and water, it will provide area residents with a grocery store, retail shops, restaurants and other amenities that will complete this model community.

The current Village plan is smaller and greener than what was originally proposed, and will honor the environment by greatly reducing the need to drive to access goods and services.

I strongly urge the City to approve this phase of the Playa Vista project.

**Response 154-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 155**

Mark A. Ozzello  
8109 Sinaloa Road  
Playa del Rey, CA 90293

**Comment 155-1**

Population estimates continue to grow for Los Angeles at a pace that far exceeds the amount of new housing. Where are all these new residents going to live?

The City of Los Angeles should be thrilled that Playa Vista has come along to provide critically needed housing at a time when demand far exceeds supply.

We can either continue moving people out to suburbia, or provide opportunities for them to live in the city, closer to where they work.

The Village plan only provides for 2,600 new housing units, but that is a lot more than any other development I know. Also, there will be a variety of housing at moderate prices, which is exactly what people are looking for. I only wish Playa Vista would build even more housing to meet the demand.

If you haven't come to Playa Vista, I encourage you to do so. If the second phase is anything like what is being built now, it will be a wonderful addition to the City.

**Response 155-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 156**

Phil Parlett  
13115 Washington Boulevard  
Los Angeles, CA 90066

**Comment 156-1**

For too long, the residents of our city have been victims of urban sprawl. The housing crisis has made it nearly impossible for most of us to live and work without intolerable commutes. Playa Vista is offering an opportunity to reverse this trend as it embarks on its next step.

With the approval of The Village, Playa Vista will provide area residents with retail, grocery, restaurant, and office facilities, among other amenities, that will result in a greatly reduced need to travel more than a short, convenient distance for work, shopping and recreation.

When you combine the residential area, the diverse parks and wildlife areas and the proposed Village, Playa Vista is a complete community that is efficient, environmentally sensitive and beautiful.

I strongly support the Village, and hope that the City will too.

**Response 156-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 157**

Richard S. Payne  
5701 Kiyot Way, #8  
Playa Vista, CA 90094

**Comment 157-1**

I just moved to Playa Vista from Huntington Beach and am thrilled to now be living close to my job at Sony Pictures Studios in Culver City. My particular office is located in the Corporate Pointe Business Center near the Fox Hills Mall, just few blocks east of where Playa Vista ends at Centinella [*sic*].

Like many people who live in the Los Angeles area, I was spending countless hours trapped in my car fighting traffic. For over 25 years, I commuted to jobs in the Los Angeles area from Orange County. Not only was it frustrating, I now want to eliminate fighting traffic on my off time as well. If the city approves The Village at Playa Vista, many people like myself will be able to walk instead of drive to take care of our daily necessities like shopping, entertainment, and dining.

Factor into that the many people like myself who will be able to ride a shuttle, ride their bikes or even walk to work, and it is clear that Playa Vista is everything that it was intended to be when it was billed as the community of the future.

**Response 157-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 158**

Terence Pearce  
Tweedlbach@aol.com

**Comment 158-1**

I am writing this letter to voice my deep concern & frustration at the continuing push to implement the Phase 2 development of the Ballona Wetlands area. Not only my deep concern, but that of so many of the residents that speak to me or are overheard by me on the subject of Ballona. It's already more than enough that we local residents have had the specter of the Playa Vista urban-blight monstrosity rammed down our throats in the face of obvious dissent & disapproval by the great majority. It is much more than enough that my small son, a toddler, is already breathing the heightened toxicity of the air caused by the increased traffic flow from this development and, like all the other young innocents in the area, must suffer for the overwhelming greed of those who have pushed Playa Vista through, and suffer yet more if the building continues. It is more than enough that the opportunity for a park for public use, in a city notorious for its lack of green spaces, has been tossed away so negligently, gutted at the altar of corporate greed, so that a few may increase their bank accounts at the expense of the many. It is more than enough that this development has been bulldozed through the courts and governmental bodies of this state by the power of vested interests and corporate wealth in direct contravention of a whole slew of laws. It is more than enough that the unfortunate and misled residents of this eyesore are to be put at serious risk to lives and health from a long list of dangers including earthquake liquefaction, cancer clusters from gas seepage, and the distinct likelihood of enormous gas explosions. But now we are to understand that, to top it all, after all this has been heaped upon us time after time, we the taxpayers of this city, and not the rapacious developers of Playa Vista, are to be held financially liable in the future for the untold millions it would cost to pay for the damage and loss of life that would occur should the gas mitigation systems at Playa Vista fail and a massive explosion ensue. It is nothing short of a direct slap in the face of the hard-working public of this area, already spat upon by those who are supposed to represent and protect us in collusion with those who just don't care for anything but an extra buck, and it is much too much to bear. Eventually this betrayal of the electorate's trust will come back to haunt politically, and I like to think perhaps, for some, even in terms of conscience, whoever backs this superannuated madness. To those in positions of authority who are attempting to stop this we give our thanks and best wishes. To those who would bring further threat and suffering upon us and especially upon our children we ask, "When will enough be enough?" Will you look back on this watershed issue & say to your children "Yes, I was there, I had the power & I did nothing to stop it!". Do the right thing, or if not the right thing then just the smart thing if you value the public's perception of you & hence your political future, and let this destructive development go no further! In all seriousness, will you ever be able to look your children or family members in the eyes if you do not make a personal stand now against the poisonous creed of greed that is pushing us all towards a degraded society in a destroyed environment, at the very time when we now possess the technology to make just as much or more money and still advance the welfare of the citizens at the same time? And yes, I am angry! It seems to be somehow very unfashionable

to be angry in the present political climate, as if anger somehow equalled [*sic*] delusion or disloyalty. Tell me then! What right-thinking sane person would not be angry at what is being perpetrated here and at least have the tiny bravery to let one's voice be heard?

### **Response 158-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. Section IV.B, Air Quality, on page 270 provides a detailed analysis of the Proposed Project's impacts on air quality. As indicated, the Proposed Project would have a significant impact on regional air quality emissions. Subsection 3.4.2.3 on page 307 provides an analysis of local impacts associated with CO hotspots that could occur from additional Project traffic. As indicated, such impacts would be less than significant.

Relating to liquefaction hazards at the site, as discussed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256, there exists moderate liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. Geotechnical studies (such as Appendix D-11 of the Draft EIR) have indicated that because of the scattered nature and relatively small size of the lenses found at the Playa Vista site, there would be a limit in the extent of liquefaction. Nonetheless, the City of Los Angeles Department of Building and Safety (LADBS) requires site-specific geotechnical investigations for issuance of building permits for individual structures. Given that LADBS requires site-specific investigations (including liquefaction risk assessment) prior to construction, and further, that application of engineered fill soils in building pads would address the potential for liquefaction directly under structures; hence, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

The commentor's remark on "cancer clusters from gas seepage" is unclear. However, Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 705, discusses the soil gas issues adjacent to the Proposed Project site. Regarding the potential for a gas explosion, Subsection 3.4.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 727, addresses the potential risk of release or explosion of soil gas during construction and operation associated with the Proposed Project.

Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 660, addresses in detail safety at Playa Vista. The commentor's concern regarding the City's liability is not an environmental issue. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 159**

Alicia M. Perez  
5399 Playa Vista Drive, #E202  
Playa Vista, CA 90094

**Comment 159-1**

Sometimes when I drive around Los Angeles or walk around my neighborhood I wonder, where are all these people driving? I can only imagine that many of them are making their trips because whatever it is they need is not available to them near their home or office.

The Village at Playa Vista will help cut down on these short, wasteful, polluting trips by putting services and amenities close to the community's residents and workers. Imagine being able to walk from your home to a nice restaurant or being able to take an electric car to the grocery store. This is the future!

The planning commissioners and City Council should approve The Village:

**Response 159-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 160**

Perryman

**Comment 160-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 160-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.



**LETTER NO. 161**

Shannon C. Phillips  
6218 West 77th Street  
Westchester, CA 90045

**Comment 161-1**

As a Westchester homeowner, I am always concerned about property values in our community. When people down the street remodel and improve their homes, it helps the entire area. When people let their homes fall into disrepair, home values plummet.

The addition of Playa Vista's new Village and the thousands of new homes will have an enormous positive impact on the home values in our community. Certainly the amenities provided by the project will enhance home values as well.

Our area is one of the most desirable places to live, not only in Los Angeles but in the entire country. People will continue to be attracted to the Westside because of the plethora of available and high-paying jobs, the climate and the beach. Now, of course, they have an additional incentive to move here--Playa Vista.

**Response 161-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 162**

Linda Piera-Avila  
1424 12th Street, #E  
Santa Monica, CA 90401

**Comment 162-1**

I am opposed to the approval of Playa Vista II. The impacts of Playa Vista I are only now beginning to be felt and it is irresponsible to approve the next phase so soon. The traffic impacts need to be fully studied by objective consultants. Gas seeps from storage fields below the development pose serious hazards to existing and potential residents. The desecration of indigenous graves to build the development is morally reprehensible.

Please stop Playa Vista II and Catellus on the West Bluff as well.

**Response 162-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of methane in Section IV.I, Safety/Risk of Upset on page 660, and a detailed analysis of archaeological resources in Section IV.P.(2), Archaeological Resources on page 1199. Corrections and Additions to these Sections are contained in Sections II.15, II.13 and II.29 of the Final EIR, respectively. Also please refer to comments of the California Native American Heritage Commission and responses in Letter 14. The “West Bluff” Project is a separate project from the Proposed Project.

**LETTER NO. 163**

Elizabeth A. Pollock  
11923 Bray Street  
Culver City, CA 90230-6009

**Comment 163-1**

I live just east of Inglewood Blvd. and about six blocks north of what will be Playa Vista Phase II. The traffic and parking problems on Jefferson Blvd. between the 405 and Culver Blvd. have worsened noticeably during the past five years, and no “remediation” effort can compensate for the fact that more people will mean more traffic.

**Response 163-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The commentator raises specific comments relating to the existing traffic and parking conditions. Such conditions would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812.

A detailed analysis of the Proposed Project’s traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1) of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project’s impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

Impacts on parking are addressed in Section IV.K.(2), Parking, beginning on page 943 of the Draft EIR. The Proposed Project will have no impact on parking on Jefferson Boulevard between the I-405 and Culver Boulevard.

**Comment 163-2**

DO NOT approve this development. It is going to be on one of the last big pieces of open land in this city, and the land should be set aside as parkland and connected with the Baldwin Hills (Kenneth Hahn) Recreation Area to create an open space corridor. Once the open land is gone, it cannot be retrieved. Further, the ugliness of Phase I does not bode well for the aesthetic value of Phase II if it is built.

**Response 163-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The Draft EIR provides a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148.

**Comment 163-3**

The City of Los Angeles had no business approving the bonds to help finance any part of Playa Vista. I cannot believe that people have forgotten the explosion in the basement of the Ross Dress For Less on Fairfax, and the oil seepages that have occurred on Carthage Circle in Beverly Hills. This development will be putting an unknown amount of weight onto an area that is being used to store natural gas underground. There are going to be leaks and other problems, and the developers' limited liability companies will sneak off into the night, leaving the City to pay for the damages. Also, the City of Los Angeles will be paying for damages to people who shop in Culver City, not Westchester.

**Response 163-3**

The Proposed Project is not located over the Southern California Gas Company's Del Rey Gas Storage Facility. Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 660, addresses in detail safety at Playa Vista. The commentator's concern regarding the City's liability is not an environmental issue.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 163-4**

In short, you can put this constituent in the "NO" column.

**Response 163-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 163-5**

P.S. In light of this morning's earthquake, you should be advised that there is no emergency earthquake shutoff valve on the huge gas pipeline that runs underneath Inglewood Blvd. If that line were to crack, Playa Vista II would be one of the neighborhoods affected.

**Response 163-5**

The gas pipeline in Inglewood Boulevard is over one-quarter of a mile from the closest portion of the Proposed Project and is therefore generally removed from the Project site. The ability to estimate the likelihood and consequences of an earthquake on that proposed pipeline and, specifically, its possible impact on the Proposed Project, which is over one-quarter of a mile away, would be speculative. Should there be an incident, the City and County of Los Angeles' Fire Departments will use incident response units as applicable (i.e., Hazardous Materials Response Unit) and guidelines (which are incident specific) already in place in order to stop, contain and correct the incident.

The comment is noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

**LETTER NO. 164**

Bill Pope

**Comment 164-1**

Phase 2 DEIR grossly underestimates its 2010 Baseline traffic on at least Inglewood Boulevard between National and Venice Boulevards.

Correct existing 2003 traffic volumes are needed street-segment-by-street-segment to start the City's required traffic modeling process.

Playa Vista produced their 2003 starting traffic volumes not by actual count but by extrapolating from actual counts taken as far back as 1998 or earlier. The annual extrapolation factor used was 1.63% and 0.91% per year for AM and PM peak hours respectively.

(This is only one-third the annual increases being experienced by the Mar Vista Hill area. LADOT has measured the increase on Inglewood Boulevard between National and Venice Boulevards 4.5% per year between 1994 and 1998, the last year for which traffic counts exist.)

As a result of the above mentioned extrapolations, the Phase 2 DEIR gives the following projected 2010 PM peak hour traffic volumes for Inglewood Boulevard:

Between National Boulevard and Palms Boulevard:

Northbound	384 and 378
Southbound	114 and 114
Total of highest projected volumes =	498 [Average Daily Volume* ~ 4,980]

Between Palms Boulevard and Venice Boulevard:

Northbound	415 and 391
Southbound	216 and 242
Total of highest projected volumes =	657 [Average Daily Volume* ~ 6,570]

\* Using the rule of thumb that the PM Peak Hours is approximately 10% the Total Average Daily Volume.

In 1998 residents of Inglewood Boulevard concerned over growing cut-through traffic privately funded a private traffic survey by LADOT. This LADOT Traffic Survey stated that Average Daily Traffic on Inglewood Boulevard five years ago was:

Between National Boulevard and Palms Boulevard: 3,992

Between Palms Boulevard and Venice Boulevard: 9,214 (2644 more trips than the DEIR projects for 2010.)

Cut-through commuter traffic has increases [sic] substantially since 1998.

Therefore we find it impossible to believe the Playa Vista Phase 2 2010 Baseline traffic model with such glaring inaccuracies as this example that states that 2010 PM Peak Hour traffic on Inglewood Boulevard after Playa Vista Phase 1 and 95 other Related Projects will be almost 30% less than it was 12 years prior to 2010.

### **Response 164-1**

The commentor raises questions about the validity of the 2003 existing conditions traffic count data and the 2010 Baseline Conditions data presented in the Draft EIR. As stated in Subsection 2.2.3.1, Section IV.K.(1), Traffic and Circulation, on page 808 of the Draft EIR, manual A.M. and P.M. peak-hour turning movement counts were conducted at 97 locations in the year 2001 and at 53 locations in the year 2002. Over 70 percent of the studied intersections had traffic counts in either 2001 or 2002. At City of Santa Monica locations, traffic count data was obtained from the Citywide Traffix model prepared by the City of Santa Monica. The counts for the remaining intersections (15 percent of the studied intersections) were updated from counts conducted in earlier years. The growth factor of 1.63 percent and 0.91 percent during the A.M. and P.M. peak hours was calculated based on comparing the year 2001 and 2002 counts to year 1998 traffic counts and reflect a statistically valid sample within the study area.

The commentor does not present the 1994 and 1998 LADOT traffic counts referenced in this comment, nor does he present the privately funded 1998 traffic survey he suggested was performed by LADOT. According to a November 12, 2002, LADOT presentation to the Mar Vista Community, total traffic growth in the Mar Vista area between 1994 and 2002 was 6 percent, or less than 0.75 percent per year. Most of this growth occurred between 1994 and 1998, when traffic was estimated to have grown an average of 4.5 percent, or 1.125 percent per year. These rates of growth are consistent with the growth factor used in the Draft EIR, discussed above. Further, LADOT has no record of performing the 1998 privately funded traffic survey of the Mar Vista area, and has not received a copy of this survey.

The data cited in this comment for Inglewood Boulevard appear to be from Figure 3-5 of Appendix K-2. However, this data represents the raw output of the traffic model; as described in Appendix 1B of the Traffic Study, contained in Appendix K-3 of the Draft EIR, this data was subject to a series of post-processing procedures to produce the final traffic volumes and turning movements used to analyze the potential significant impacts of the proposed project. The final post-processed traffic volumes and turning movements are presented in Appendix 2 of the Traffic Study, contained in Appendix K-4 of the Draft EIR.

The traffic volumes predicted by the model for the segments of Inglewood Boulevard in question are greater than the data presented in this comment.

**Comment 164-2**

Phase 2 DEIR may grossly underestimate any currently remaining capacity of Centinela Boulevard Between National and Venice Boulevards if the City of Los Angeles lives up to Goal 14 of the Palms-Mar Vista-Del Rey Community Plan and effectively “discourages non-residential commuter traffic on residential streets” of Inglewood Boulevard between National Boulevard and Venice Boulevard.

Based on LADOT’s guidelines for “Excessive Through Traffic on Collector Streets and the privately-funded 1998 LADOT Traffic Survey, non-residential commuter cut-through traffic on Inglewood Boulevard between National and Venice Boulevards had already grown to approximately half of the total daily traffic on this street segment as far back as 5 years ago. And the volume of non-residential commuter cut-through traffic has increased substantially since then as a result of the steady deterioration in the level of service of the arterial street Centinela Boulevard.

The residents of Inglewood Boulevard between National and Venice Boulevards are currently prepare [*sic*] a petition to the City to stop all non-residential commuter cut-through traffic on Inglewood Boulevard between National and Venice Boulevards. If the City lives up to the claims its makes in Community Plans to be working “for a more livable Los Angeles” and specifically to Goal 14 of the Community Plans which states that the City should “Discourage non-residential traffic flow on residential streets and encourage community involvement in determining neighborhood traffic controls”, then a majority of the traffic currently using the residential collector portion of Inglewood Boulevard will be diverted back to the commuter arterial street of Centinela where it belongs.

This will increase traffic on Centinela and will result in less capacity remaining for new development-generated traffic.

Therefore, the City should:

1. Meet with Inglewood Boulevard residents, per Goal 14, to determine requirements to effectively discourage cut-through traffic, then
2. Implement effective cut-through commuter traffic barriers on the residential portion of Inglewood Boulevard, then
3. Re-measure any excess capacity remaining on Centinela Boulevard after cut-through traffic on Inglewood Boulevard has been directed back to its intended arterial street, then
4. Re-evaluate Playa Vista Phase 2 and Related Projects based on the actual measured remaining capacity,
5. Require developers to implement any infrastructure expansion measure determined via modeling as required to accommodate the developer’s proposed traffic,



6. Measure the resulting new expanded excess capacity after those expansion measures are in place, and then

7. Give Playa Vista Phase 2 permission to generate new traffic up to that expanded excess capacity limit.

I am sure you will laugh at the above suggestions as being totally out to the question. However before you do, please answer the following questions.

If the City of Los Angeles does as it claims and requires every developer and every neighboring city to identify, via the City's modeling tools, the impacts of their traffic against worst-case scenarios and to mitigate the impacts of their generated traffic, and if every developer claims, as Playa Vista does, to fully mitigate those impacts, then:

Why has the level of service of our streets and freeways continually declined over the years?

Why do almost all of our arterial intersections and freeways now provide less than satisfactory (LOS "D") service during peak traffic hour?

Why are many intersections at LOS "F" (Failure) and subject to actual gridlock at any time?

Why do vehicle [*sic*] sit on Centinela, with idling engines polluting the air, through 3 signal changes before clearing the [*sic*] at Venice intersection?

Why does it take an hour to go 5 miles from Westwood to Culver City?

Why does the 405 move at 6 miles per hour in between 4:00 and 6:30 PM?

Considering the City's track record of managing traffic growth, does the City agree that something is wrong with the current traffic modeling and mitigation implementation process?

What is causing the continual deterioration of our transportation infrastructure's level of service?

How is the City planning to fix these problems and when?

### **Response 164-2**

The current existing capacity of Centinela Avenue between National and Venice Boulevards is constrained by the intersections of Centinela Avenue/Venice Boulevard and Bundy Drive/Ocean Park Boulevard. As presented in Table 115 of the Draft EIR, on page 812, the Centinela Avenue/Venice Boulevard intersection operates at LOS F in both the A.M. and P.M. peak hour; the Bundy Drive/Ocean Park Boulevard intersection operates at LOS E and F in the A.M. and P.M. peak hours, respectively.

The commentor raises specific comments relating to the existing traffic conditions on Inglewood Boulevard and suggests commuter cut-through traffic is a substantial portion of that existing traffic. Such traffic would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812.

The commentor suggests that a Neighborhood Traffic Assessment and Management Study be conducted specifically for Inglewood Boulevard within portions of the Mar Vista community, and then the potential impacts of the Proposed Project be re-analyzed. The Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed in Subsection 3.4.7, the Proposed Project would not result in any significant impacts on neighborhood traffic in the Mar Vista area. As such, no further study would be required. However, in the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458 for a discussion on the methodology, criteria for evaluation and the results of the evaluation associated with neighborhood traffic impacts. See Topical Response TR-6, Relationship with Community Plan Policies, on page 460 for an accurate description of Community Plan Policies and the actions that the City of Los Angeles has taken in recognition of the same.

The remainder of the comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 164-3**

Phase 2 should be required to fund measures necessary for protecting the Mar Vista Hill neighborhood, specifically the residential street of Inglewood Boulevard between National Boulevard and Victoria Avenue, and the residential street of Grand View Boulevard between National Boulevard and Venice Boulevard, from intrusion by Phase 1 and Phase 2 generated traffic.

Our rationale for this request is as follows:

Although the area studied for both Phase 1 and Phase 2 traffic impacts covered a 100 square mile area, only residents within a 500 foot radius of the Phase 1 project were notified by the City of Los Angeles of the opportunity to review and comment on the potential traffic impacts to their neighborhoods from Phase 1 traffic before it was approved by the City.

Playa Vista Phase 1 is projected to generate 2.5 times the estimated traffic of Phase 2, therefore comments on Phase 1 should have been solicited from an even larger area than was done for Phase 2, but the City failed to do this.

According to data and information provided by Playa Vista and its traffic consultant Kaku Associates (hardcopy available on request), to both the Mar Vista Community Council the Mar Vista Neighborhood Association and the Mar Vista Hilltop Neighbors Association on September 22, 2003, Phase 1 can be expected to be the source of approximately 75% of the traffic increases listed on the Phase 1 DEIR on Centinela and Inglewood Boulevards.

According to the data provided by Playa Vista and Kaku Associates, Playa Vista Phase 1 is expected to increase southbound AM Peak Hour traffic on Centinela Boulevard by:

690 vehicles between Ocean Park and National Boulevard

910 vehicles between National and Venice Boulevards (220 vehicles entering from National Boulevard)

440 vehicles between Venice and Washington Boulevards (470 vehicles leaving the southbound Centinela flow.)

Inglewood Boulevard by:

?? vehicle between National Boulevard and Venice (no data was provided )

620 between Venice and Washington Boulevard

We have the following questions:

To where do the 470 vehicles that leave the southbound Centinela flow between Venice and Washington Boulevards go?

- Examination of Phase 2 generated increases East/West on Venice would indicate that Phase 2 will cause little increase in Venice. Therefore it seems unlikely that Phase 1 would result in much east/west destination traffic on Venice either especially considering that their destination is likely to be the Commercial section of Phase 1 at the southern end of Centinela.
- It is likely that this traffic will continue south to the Phase 1 commercial section.

From where do the 620 vehicles that joins the southbound Inglewood Boulevard between Venice and Washington Boulevards come?

- It seems illogical to assume this is Venice westbound traffic turning southbound across Venice.

- It seems illogical to assume Venice eastbound traffic waiting until Inglewood before turning south to Playa Vista.
- Considering that the Centinela intersections at Ocean Park, Venice, Washington Place and Washington Boulevard are projected to be at Level of Service of E or F even after mitigation, and considering that commuters begin taking alternate routes at LOS D or worse, it can be assumed that this traffic will actually start using Inglewood Boulevard at National and Grand View Boulevard to avoid Centinela. If traffic is attempting to avoid Centinela between Venice and Washington Boulevard, then it can also be assumed that it will avoid Centinela between National and Venice by taking Grand View to Inglewood and Inglewood Boulevard residential streets.

Therefore it would be logical to assume that a major portion of the 620 vehicles being added to the southbound Inglewood Boulevard flow (probably at Venice) are the 470 vehicles that leave the southbound Centinela flow at Venice.

This increase appears to us to be quantification by the model of the additional cut-through traffic to be anticipated on Inglewood and/or Grand View resulting from Playa Vista Phase 1. (Data and Maps supporting these arguments were left with Joe Wang LADOT on 9/29/03, and are available on request to the return Email address.)

### **Response 164-3**

The commentor suggests that the Proposed Project be required to fund measures necessary for protecting the Mar Vista Hill neighborhood from traffic intrusion impacts. As discussed in Response 164-2, above, the Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic, and concludes that the Proposed Project would not result in any significant impacts on neighborhood traffic in the Mar Vista area. As such, no mitigation measures would be required. However, as stated in the Draft EIR, Technical Appendix K-1, Volume XX, pages 6 and 7 in the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means. Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458 for a discussion on the methodology, criteria for evaluation and the results of the evaluation associated with neighborhood traffic impacts.

The First Phase Playa Vista Project was addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995. The Draft EIR analyzed the traffic impacts of the

Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area. Please see Topical Response TR-3, Related Projects, on page 453, for additional information on related projects and methodology.

The commentator incorrectly attributes the traffic increases referenced in this comment to the previously approved First Phase Project. These traffic increases are a result of the growth associated with other related projects throughout the area, including the 96 related projects analyzed as part of the Draft EIR, as well as other ambient growth occurring within the study area. The First Phase Project is one of the 96 related project analyzed in the Draft EIR (Related Project No. 40) and, as such, contributes to these traffic increases, but is not the primary contributor.

Other questions raised in this comment appear to relate to the traffic growth between 2003 existing conditions and the 2010 baseline conditions referenced above, and are unrelated to the Proposed Project. As such, the interpretations of this data offered by the commentator are associated with the ambient growth and growth occurring due to other related projects, and not of any impacts of the Proposed Project.

#### **Comment 164-4**

According to page 7 of 8 of LADOT's August 11, 2003, Inter-Departmental Correspondence from Jay W. Kim to Gordon Hamilton, Deputy Director Department of City Planning, titled Initial Traffic Impact Assessment of the Proposed Village at Playa Vista Project (EIR No. ENV-2002-6129-EIR) Phase 2 will be required to fund measures needed to protect four identified neighborhoods from Phase 2 generated traffic. The Mar Vista Hill neighborhood was not one of the identified neighborhoods. We are requesting that the Mar Vista Hill neighborhood be added to that list and that Playa Vista Phase 2, as the final phase of the Playa Vista Master Plan be required to fund cut-through traffic prevention measures determined by the residents of the Mar Vista Hill neighborhood in conjunction with LADOT as necessary prevent intrusion of all Playa Vista traffic.

#### **Response 164-4**

As discussed in Response 164-3, the analysis of potential neighborhood impacts contained in the Draft EIR indicates that there would be no significant neighborhood traffic intrusion impacts to the Mar Vista Community. Further, as stated above, in the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

**Comment 164-5**

Please explain the “Gravity Model” used to predict the direction of Playa Vista traffic trip distribution.

**Response 164-5**

The “Gravity Model” is a type of mathematical formulation which was utilized for trip distribution. The Gravity Model formulation is based on the Newton’s Laws of Gravity, and can be stated in the following simplified manner: “Trips from an origin to a destination are directly proportional to the magnitude of attractions in the destination traffic analysis zone (which is based on the number of employees or total employment available) and inversely proportional to the travel impedance between the origin and destination zones.” Please see Topical Response TR-1, Playa Vista Transportation Model, on page 445 and Topical Response TR-2, The Village at Playa Vista Trip Distribution, on page 451 for a further discussion of the Gravity Model, additional details on the Trip distribution model, and its role in the overall process.

**Comment 164-6**

Please explain the “Mode Split and Auto Occupancy Assumptions (GPF)” used in producing the Phase 2 traffic model.

**Response 164-6**

Please see Topical Response TR-1, Playa Vista Transportation Model, on page 445, for details on the overall process including the Mode Split component. Mode split refers to the method of travel (car, bus, train). The mode-split models used by SCAG are logit mode-split models. These models estimate the proportions of travelers that will use various modes of transportation (autos, transit, walk, bike). These proportions, in turn, are dependent upon the relative levels of service (such as costs, in-vehicle travel times, stop times, parking costs, access and egress times and dwell times) offered by each mode and the socio-economic characteristics of the trip-makers. The logit functions used by SCAG are complex mathematical formulations that state that the probability of choosing a particular mode for a given trip is based on the relative values of the costs and levels of service on the competing modes for the trip interchange under consideration. The SCAG mode split models also reflect the economic status of the traveler through a measure of vehicle ownership and income. The Playa Vista focused model uses the same SCAG model data set for mode splits, and uses SCAG assumptions for auto occupancy. The Mode Split Model component details are provided in the Draft EIR, Technical Appendix K-3, Volume XX, Appendix Volume 1B. Additional details regarding the mode split models are available in the respective documentation for the SCAG and General Plan Framework Travel Demand Forecasting Models.

**LETTER NO. 165**

Praad Geotechnical, Inc.  
Daniel Pradel  
President & Chief Engineer  
5465 South Centinela Avenue  
Los Angeles, CA 90066-6942

**Comment 165-1**

December 22, 2003

Following our telephone conversation with Ms. Charlotte DeMeo, of the Del Rey Association, we are enclosing a copy of our December 19, 2003, letter for your review. Please note that we object to having City of Los Angeles signs and parking restrictions on our property, which is located in Los Angeles County territory. We kindly request that the City of Los Angeles restore the curb and street signs to their prior condition.

If you have any questions, please do not hesitate to call me.

**Response 165-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

This issue is not related specifically to the Proposed Project or any impact of the Proposed Project. The comment will be referred to LADOT for their consideration.

**Comment 165-2**

[Attachment: December 19, 2003, letter to Los Angeles County Department of Public Works]

Our business is located in County of Los Angeles territory. During our telephone conversation of November 26, 2003, I informed you that the City of Los Angeles, without previous warning, did the following:

- Painted red the curb in front of our business.
- Placed signs restricting parking in front of our business.

You indicated at the time that one of your engineers would look into it and call us back. We look forward to your engineers [*sic*] phone call and feedback. In addition, this morning the City of Los Angeles installed a large sign on our front yard. The sign is approximately 7-feet wide by 13 ½-feet high. Once again, the sign was placed without previous warning and right in front of the main entrance to our office.

We object to the above unilateral actions by the City of Los Angeles, since they are intrusive and detrimental to the use of our property and business. Furthermore, we object to having City of Los Angeles signs on our property which is located in the County territory. I kindly request that you take action and stop the City of Los Angeles from trespassing onto County property and have them remove the recently placed sign and restore the curb and street signs to their prior condition.

If you have any questions, please do not hesitate to call me at (310) 313-3111.

**Response 165-2**

The attachment supports statements in Comment 165-1. As such, the attachment is addressed in Response 165-1.



**LETTER NO. 166**

Leslie Purcell  
11924 W. Washington Blvd.  
Los Angeles, CA 90066

**Comment 166-1**

In regard to the Playa Vista Phase 2 DEIR:

I find that there are significant discrepancies in this document, as well as in the assumptions underlying the methodologies employed in its creation and conclusions. At the NOP public hearing in December of 2002, I, as well as others, stated our concerns that the land in the Phase 2 area remain as it was then (as is required by CEQA, I believe) during the EIR process. This did not happen, as was well documented in photographs and video by myself and others, including Kathy Knight and Patricia McPherson.

Documentary evidence shows Playa Capital's destruction of habitat (including pumping, grading and filling of a marshy ponded area used by many kinds of birds, including ducks, coots, and snowy egrets), massive stockpiling of soils and debris, as well as the ongoing use of large pieces of heavy equipment, which permanently changed the areas undergoing the EIR process. I believe that this activity and disturbance was done (illegally) without any CEQA review. When evidence of this ongoing activity was brought to the attention of the City of Los Angeles Building and Safety Department in the spring of 2003, and questions were raised as to the permitting of this activity, the City responded by issuing retroactive permits for the work that had been occurring for several months. This action is a subversion of the CEQA process, and calls into question the validity of the entire DEIR that the City has put forth for comment.

**Response 166-1**

It is unclear to which "marshy ponded area" the commentor refers. However, it appears the reference is to the erosion control basin constructed as part of the annual erosion control plans approved by the City Department of Public Works to support construction of the First Phase Playa Vista Project.

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state, and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

**Comment 166-2**

The draining and filling of a wetland area (such as the marshy pond) requires a Federal 404 permit. It appears that wetland delineations used for the DEIR were not current, and should have been reevaluated, as was done for the Ballona areas under consideration for the recent State acquisition. 1 acre of wetland was cited in some places in the DEIR, while in others it was cited as .7 acres.

**Response 166-2**

As discussed in Subsection 2.1.1.1 of Section IV.D, Biotic Resources, of the Draft EIR on pages 523-524, in 1992, the Corps issued Permit No. 90-426-EV under Section 404 of the Clean Water Act for the “fill of a total of 16.1 acres of disturbed wetlands in various portions of the former Playa Vista Planning Area, including the Proposed Project site, for construction of the Freshwater Wetland System and a mixed-use development.... No further permit from the Corps is required for the Proposed Project.” This item is located in the reference library for the Final EIR. Within the Proposed Project Site, the Corps permitted the fill of 0.7 acre delineated as wetland, consisting of the Centinela Ditch and other isolated and degraded wetlands. As discussed in Subsection 2.1.2.2 of Section IV.D, Biotic Resources, of the Draft EIR on pages 525-526, “[i]n 1991, the CDFG issued a Streambed Alteration Agreement to the Applicant’s predecessor, which allows for the fill of the 16.1 acres of isolated and degraded wetlands as identified in the Corps Section 404 Permit within the Proposed Project area and the adjacent Playa Vista First Phase Project. This permit has been extended through June 2008.” Corp Permit No. 90-426-EV and CDFG Streambed Alteration Agreement No. 5-639-93 are contained in the Draft EIR Appendix G-1. As a result, a new wetland delineation is not required.

**Comment 166-3**

1. Cumulative impacts from other area developments, including the proposed Catellus “West Bluffs” development. Massive amounts of soil from the bluff is being hauled to the Playa Vista site, mainly to the east end of Phase 1, and is transported by many diesel trucks through the Phase 2 area, again as it is undergoing the EIR process. Was there any CEQA review of this construction/hauling activity, especially in regard to air pollution from so many diesel trucks? (Diesel is responsible for 70% of cancer-causing emissions according to this DEIR.)

**Response 166-3**

The activities described in this comment are not a component of the Proposed Project. The City of Los Angeles certified an EIR for the West Bluffs project on February 24, 1999. The project was later modified as described in an October 1999 Addendum. The project’s environmental documents, as modified, described the project’s impacts from soil export. The EIR was successfully defended against a litigation challenge in *Coalition for Concerned Communities, Inc., et al. v. City of Los Angeles*, Case No. BC 207782 (Los Angeles Sup. Ct.).

**Comment 166-4**

Also, the proposed Catellus “West Bluffs” development is incorrectly listed in this document as 120 houses.

**Response 166-4**

The number of houses described for this related project, Related Project 24, represents an earlier version of the Project that has since been slightly reduced to 114 single family homes. The reduction in the size of the Project would slightly reduce the cumulative impact analyses in the Draft EIR. The variation in the number of units would not alter any of the conclusions in the Draft EIR.

**Comment 166-5**

2. Where is the documented evidence for certain assumptions stating the need for more housing in this area of Los Angeles? In fact, there is an excess of housing on the Westside now, and much of it goes unleased and uninhabited, even as more is being built. What we need is more affordable housing, which is not primarily what Playa Capital intends to build.

**Response 166-5**

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Table 101 on page 762 of Section IV.J., Population, Housing and Employment, of the Draft EIR, provides SCAG’s population forecast for several geographic areas that include the Project site. As shown in this table, SCAG is projecting that the population within the Westchester-Playa del Rey Community Plan Area is going to increase by over 9,200 people (16.8 percent growth) between the 2002 and 2010 timeframe. Looking at this issue from a broader regional context, Table 111 on page 794 of the Draft EIR indicates that the population within the Westside of Los Angeles and the South Bay is going to grow by over 56,000 people (8.2 percent growth) between 2002 and 2010. In contrast, the SCAG projected housing increase for the Community Plan area is 2,969 units (a 12.7 percent growth rate). (Please note that Table 111 portrays the increase in housing units as 2,696. A correction has been made to Table 111 to reflect the accurate number.) Table 98 on page 758 of the Draft EIR identifies the housing vacancy rate in 2000 for several geographic areas that include the Project site. As shown in this table, vacancy rates range from 3.6 percent to 5.7 percent with an average of 4.5 percent, and a Westchester-Playa del Rey Community vacancy rate of 3.6 percent. Housing markets functioning with vacancy rates in the 2 to 3 percent range are described as being very constricted; i.e., there is very little housing supply to meet the corresponding housing demand. As these vacancy rates show, there is going to be a considerable shortfall in the housing market if additional units are not constructed to accommodate the forecasted population growth.

Another indicator of the need for housing on the Westside can be found in the issue of jobs/housing balance. As described in Subsection 3.4.5 of Section IV.J., Population, Housing and Employment, of the Draft EIR, the Westside area is heavily jobs rich (the ratio of jobs to housing in the local Area is expected to be 2.76 in 2010), which means that there is a disproportionately high number of jobs relative to the number of housing units. This translates to the need for large numbers of people to commute to the Westside, which in turn creates traffic congestion and resultant air quality and noise pollution. Thus, increasing the housing supply on the Westside would contribute to reducing the jobs/housing imbalance and create a number of individual and community benefits.

Please refer to Section II.14, Corrections and Additions, of the Final EIR for the following revision located in Volume I, Book 2, Section IV.J, Population, Housing and Employment, p. 794. On Table 111, revise the 2002-2010 Increase in Housing Units for the Westchester-Playa del Rey Community Plan Area to reflect an increase of 2,969 units.

### **Comment 166-6**

3. The net loss of 60.9 undeveloped acres is a significant impact, both in habitat and open space for area residents and visitors. In the past several years, I have seen many hawks, kestrels, and a golden eagle hunting in the area that this proposed project would permanently destroy. Re-creation of a “riparian corridor” habitat and planting native vegetation on the bluff-side, after destroying the larger open space, is not a good trade environmentally. The DEIR admits that “this highly disturbed area still provides foraging opportunities for raptors and some marginal nesting habitat for common migrant birds”.

### **Response 166-6**

Section IV.D, Biotic Resources, of the Draft EIR on pages 547 and 552 state that “[t]he Urban Development Component of the Proposed Project would result in a net loss of foraging area for raptors such as Cooper’s hawk, but this loss is unlikely to affect long-term survival of the species *due to the restoration components of the Project and presence of more diverse foraging opportunities off-site in the nearby Ballona Wetlands*” (emphasis added). In considering potential impacts of loss of raptor foraging area, the probable size of the prey base and its capacity to support predators must be evaluated in addition to total acreage of land. The conclusion in the Draft EIR, quoted above, is based on an assumption that the increase in diversity of cover and native vegetation resulting from the Habitat Creation/Restoration components of the Proposed Project will increase the abundance of rodents, snakes, lizards, and small birds that form the food base for raptors, including Cooper’s hawk.

The remaining comment is noted and will be incorporated into the Final EIR for review and consideration by decision-makers.

**Comment 166-7**

4. The habitat value of the “riparian” corridor is questionable, as it lies between the steep side of the bluff and the proposed 4-lane roadway (up to 20,000 car trips a day cited in a Playa Vista presentation). The proposed building height next to the road is up to 112 feet, creating an artificial canyon-like setting that would hold the pollution from car exhaust, in addition to creating water quality, noise and light effects on habitat, plants and animals (not adequately addressed in the DEIR).

**Response 166-7**

The impact analysis in Section IV.D, Biotic Resources, of the Draft EIR evaluated the potential impacts of human activity, noise, glare (light) on wildlife that might occupy the Habitat Creation/Restoration component of the Proposed Project. As discussed in Subsection 3.3.5 of Section IV.D., on page 545, the Riparian Corridor and Bluff Restoration elements of the Project have the potential to provide habitat for special status species. Lighting and landscape buffers adjacent to the habitat areas would be addressed with design measures to protect the potential habitat values of these areas with respect to light, glare, and traffic noise. In addition, intrusion by humans and pets would be restricted. Without such measures, use of the Habitat Creation/Restoration Component of the Project by sensitive species could be limited. The mitigation measures described in Section IV.D, Biotic Resources, of the Draft EIR on page 551 are designed to minimize these impacts.

Section IV.C.(2), Water Quality, of the Draft EIR discusses the potential water quality impacts of the Proposed Project. As discussed in Subsection 3.4.1.2.8 of Section IV.C.(2), on page 505 of the Draft EIR, “With respect to water quality performance, the analysis presented above demonstrates that: (1) the water quality within the Freshwater Wetlands System will support the habitat required to be created and maintained therein; and (2) the Proposed Project will not materially affect the attainment of the specified habitat values. Further, the Proposed Project, on its own as well as in combination with the adjacent Playa Vista First Phase Project, will not significantly adversely impact water quality in Santa Monica Bay, the Ballona Wetlands, or the Ballona Creek Estuary, which conclusion is consistent with the goals for which the agencies issued their approvals for the Freshwater Wetlands System and established the Performance Criteria.”

Operational impacts attributable to travel along Bluff Creek Drive (i.e., the proposed 6-lane road referenced in the Comment), are analyzed in terms of carbon monoxide (CO) concentrations per SCAQMD procedures and practices. The SCAQMD recommends analyzing CO in cases such as the Proposed Project as CO is the largest single constituent and is considered to be the best indicator to assess changes in pollutant concentrations attributable to mobile-source emissions. Furthermore, it is the only pollutant from mobile sources for which standardized modeling methodologies for estimating localized concentrations have been developed and approved by the SCAQMD.

The intersection of Bluff Creek Drive and Lincoln Boulevard was analyzed as it is the location with the highest potential to yield a CO hotspot along Bluff Creek Drive since it is the location with the highest Project traffic and level of traffic congestion. All other locations along Bluff Creek Drive are anticipated to yield CO concentrations that are lower than the Bluff Creek Drive and Lincoln Boulevard intersection due to relatively reduced traffic volumes and traffic congestion. CO concentrations at this, as well as all other analysis locations were analyzed relative to national and state ambient air quality standards.

Consistent with SCAQMD's CO modeling protocol, all four corners of the intersection were modeled using a receptor distance of three meters for the one-hour analysis and seven meters for the eight-hour analysis. In addition, a low wind speed of 0.5 meter per second and a very stable stability class of G (i.e., stagnate conditions) were used in the analysis. These conditions are indicative of the conditions discussed in the comment (i.e., holding the pollution from car exhaust). All of this supports the notion that an artificial canyon-like setting that would hold the pollution would not occur.

As shown in Tables 17 through 20 of Section IV.B, Air Quality, in the Draft EIR, no significant impacts would occur at the intersection with the highest traffic volumes and worst level of service along Bluff Creek Drive (i.e., the intersection of Bluff Creek Drive and Lincoln Boulevard). As CO concentrations are lower when traffic volumes and congestion are reduced, no significant impacts would be anticipated to occur at any other locations along Bluff Creek Drive as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersection. Consequently, the conditions along Bluff Creek Drive would not be significantly affected by CO emissions generated by the net increase in traffic which would occur under the Proposed Project. As the Proposed Project or cumulative traffic does not cause localized air quality impacts related to mobile sources, emissions were therefore concluded to be less than significant for the Proposed Project.

#### **Comment 166-8**

5. 55 trees are listed as on-site in an Appendix document, and would be cut down for the proposed project, which would create more loss of habitat and nesting sites for many birds.

#### **Response 166-8**

As discussed in Subsection 3.3.1 of Section IV.D, Biotic Resources, of the Draft EIR on page 542: "The Urban Development Component area is utilized by a number of common wildlife species for foraging and, in the case of birds, nesting during the breeding season. This habitat would be lost as a result of the Project, but replaced by the Habitat Creation/Restoration Component of the proposed Project, which is expected to establish higher quality, more diverse breeding and foraging habitat than presently occurs on-site." The rationale for this conclusion is provided in Subsection 3.4 of Section IV.D, Biotic Resources, on the Draft EIR on pages 546-547. As stated therein, the Habitat Creation/Restoration Component has potential to result in an increase in the overall diversity and abundance of wildlife species due to the increased diversity of habitats compared to existing conditions. Subtracting the existing 1.5 acres of native coyote

brush area that would be lost due to direct impacts of the Urban Development Component from the proposed 11.7-acre Habitat Creation/Restoration Area, the Proposed Project as a whole would result in a net gain of 10.2 acres of native habitat consisting of emergent marsh, willow scrub woodland, mixed riparian woodland, native grassland, and coastal sage scrub. The existing 1.5 acres of coyote brush, while dominated by the native coyote brush, is somewhat degraded by its small size and presence of invasive non-native species such as pampas grass. Abundance and diversity of native resident and migrant wildlife that currently forage and/or breed on the Project site would be expected to increase as a result of the increased acreage and structural diversity of the habitat. Furthermore, as envisioned by the design and landscaping concepts presented in Subsection 3.3.1.2.5 of Section IV.O, Visual Qualities (Aesthetics and Views), of the Draft EIR on pages 1167-1168, approximately 800 trees would be planted in the parkways and parks within the Proposed Project site.

### **Comment 166-9**

6. Ballona Creek is cited as an impaired water body requiring special consideration according to the Clean Water Act. The proposed project would have impacts from urban run-off, including that of a potential rodent control program, on the Ballona Creek watershed.

### **Response 166-9**

The Draft EIR provides a detailed analysis of potential impacts of the Proposed Project to the Ballona Creek (known as Ballona Channel or Ballona Estuary at the point where runoff from the Proposed Project enters that waterbody) in Subsection 3.4.1.2.5 of Section IV.C.(2)., Water Quality, on page 478.

Subsection 4.0, Section IV.A, Earth, page 267 of the Draft EIR, includes a mitigation measure requiring rodent control during grading of the Proposed Project. As required in that mitigation measure, the rodent control program shall comply with all applicable local, state, and federal regulations, including those which serve to protect natural resources that could be affected through urban run-off.

### **Comment 166-10**

7. Native American cultural resources have not been properly addressed by the current Playa Vista Phase 1 development, where a burial ground is currently being excavated, despite the wishes of tribal descendants that the burials be left in situ. An old agreement is being used for the Phase 2 DEIR, which is not appropriate. This whole Indian village site and burial grounds extended through the Ballona valley and up onto the bluffs, and should have been given a comprehensive assessment, as would be done with the EIS process.

**Response 166-10**

Section IV.P.(2), Archaeological Resources, of the Draft EIR addresses the impacts of the Proposed Project on archaeological resources and proposes mitigation measures, which when implemented would reduce impacts to a less-than-significant level. For additional information regarding these issues, please refer to Response to Letter No. 14.

The comprehensive consultation process leading up to execution of the Programmatic Agreement by the Army Corps of Engineers (ACOE), the California State Historic Preservation Office, and the Advisory Council on Historic Preservation, with the concurrence of Vera and Manuel Rocha, interested Gabrielinos, and the Gabrielino/Tongva Tribal Council, is described in Subsection 2.1.1 of Section IV.P.(2), Archaeological Resources, of the Draft EIR on pages 1199-1202.

The National Historic Preservation Act requires the ACOE to consult with federally recognized Indian tribes. The ACOE went above and beyond the requirements of Section 106 of the National Historic Preservation Act in consulting with Native Americans prior to extending the Programmatic Agreement. In October 2001, as part of its consultation responsibilities under the Programmatic Agreement, the ACOE made a concerted effort to identify all Gabrielino organizations that may have had an interest in the Playa Vista project. On June 7, 2001, a letter regarding the proposed extension of the Programmatic Agreement was sent to five Gabrielino groups: the Gabrielino People (Vera Rocha, Chief), the Gabrielino/Tongva Tribal Council (Anthony Morales, Chief), the Gabrielino/Tongva Indians of California (Martin Alcalá, Chief), the Coastal Gabrielino/Digueno Indian Band (Jim Velasquez, Chief), and the Gabrielino/Tongva Indians of California (Robert Dorame, Chief). Vera Rocha (Chief, Gabrielino People) and the Gabrielino/Tongva Tribal Council were signatories to the Programmatic Agreement in 1991. No objections to the extension of the Programmatic Agreement were received. The California State Historic Preservation Office concurred with the extension of the Programmatic Agreement on September 24, 2001. The ACOE formally extended the Programmatic Agreement on October 11, 2001, to October 22, 2011.

**Comment 166-11**

8. The use of pile-drivers in the proposed construction could result in the destruction of Indian burial sites and artifacts.

**Response 166-11**

Potential impacts to archaeological resources, including impacts on Native American burials, associated with the Proposed Project are addressed in Section IV.P.(2), Archaeological Resources, of the Draft EIR, beginning on page 1199. Section IV.P.(2), Archaeological Resources, of the Draft EIR identifies and discusses the potential impacts on CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769, and concludes, on page 1224, that



implementation of the Programmatic Agreement and mitigation measures listed therein would reduce impacts on archaeological resources to a less-than-significant level.

The exact location of burials and other archaeological resources is not easily predicted, and on occasion human remains and artifacts are found during construction. As identified in the mitigation measures included in Subsection 4.0 of Section IV.P.(2), Archaeological Resources, of the Draft EIR on pages 1222-1223, efforts will be made to avoid human remains and other archaeological resources. In cases where human remains are encountered, the Applicant shall comply with the Programmatic Agreement and the requirements of the California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. The Most Likely Descendant designated by the Native American Heritage Commission for Playa Vista has provided guidelines for the handling of human remains. The guidelines would be considered in connection with the handling of Native American remains discovered during construction of the Proposed Project.

As discussed in Subsection 2.2.3 of Section IV.P.(2), Archaeological Resources, of the Draft EIR on page 1212, “[u]nder the research program implemented by SRI, for the area subject to the Programmatic Agreement, 22 loci of cultural materials have been identified. Of these 22 loci, four are fully or partially located within the Proposed Project site.” Of these, only CA-LAN-62 and CA-LAN-211/H have been recommended to be eligible for the National Register. Given the location of these areas and the proposed uses of these areas under the Proposed Project, it is not expected that pile driving will take place in these areas.

### **Comment 166-12**

9. Developments over a certain size are now required to specify adequate sources of drinking water, particularly as the California allotment of Colorado River water is being more limited. Has water supply been adequately addressed, especially as it may affect other areas?

### **Response 166-12**

Section IV.N.(1), Water Consumption, of the Draft EIR addresses water supply and is supported by Appendix N-1b, which contains the Water Supply Assessment (WSA) prepared by LADWP for the Proposed Project pursuant to the Water Code, as amended by SB 610. SB 610 requires LADWP to prepare a comprehensive water supply assessment for every new development “project” (as defined by Section 10912 of the Water Code) within its service area. The water supply assessment evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and how they would be secured if needed. The requirements of SB 610 provide the means to ensure that the water supply needs have been carefully considered, relative to LADWP’s ability to adequately meet future needs. The WSA, approved by the LADWP on August 1, 2003 (Resolution #004030), and the Draft EIR conclude that sufficient water supplies for the Proposed Project will be available. The WSA prepared by LADWP includes the descriptions of water sources required by SB 610. SB 610 does not require LADWP to assess water supply availability outside of its service area. The WSA is included in

Appendix N-1b of the Draft EIR. The WSA with the final resolution attached has also been included in the Appendices of the Final EIR.

### **Comment 166-13**

10. Toxic issues and the toxic plume, in relation to the underlying aquifers, seismic hazard and liquefaction zones, and the greater Ballona watershed have not been adequately addressed in the DEIR.

### **Response 166-13**

The nature and extent of soil and ground water contamination at the Proposed Project site is discussed in detail in Subsection 2.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 682. As it relates to the construction and operation of the Proposed Project, impacts associated with soil and groundwater contamination (including the plume) is addressed in Subsection 3.4.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 723. In Subsection 2.2.2 of Section IV.A, Earth, of the Draft EIR on page 218, you will find an extensive discussion of seismic faults and other geological hazards (such as liquefaction) that could potentially impact the Proposed Project. Impacts associated with seismic hazards, including liquefaction, are addressed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 254. The Draft EIR addresses impacts to the Ballona watershed in Section IV.C.(1), Hydrology, and Section IV.C.(2), Water Quality. Subsection 2.2.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 348, identified the regional (e.g., Santa Monica Bay and Ballona Creek Watershed) and local (off-site tributary) watershed areas associated with the Proposed Project. How the Proposed Project would affect those watershed areas, such as increase in flooding or change in pattern or amount of surface water, is discussed in Subsection 3.4.1 of Section IV.C.(1), Hydrology, of the Draft EIR on page 373. Subsection 2.2.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 412, identifies the main waterbodies (including those associated with the Ballona watershed) that directly or indirectly receive surface water from the Proposed Project site. The impacts to these waterbodies, as it relates to regulatory standards, from construction and the loads and concentrations from Proposed Project operation, are analyzed in Subsection 3.4.1 of Section IV.C.(2), Water Quality, of the Draft EIR on page 459.

### **Comment 166-14**

11. Adequate alternatives were not seriously considered (including the creation of a park and open space alternative), and assumptions were given about housing and job creation that bear little resemblance to reality.

### **Response 166-14**

The selection of Alternatives was based on guidelines presented in Section 15126.6 of the State CEQA Guidelines. As indicated in Section 15126.6(a), “an EIR shall describe a range of

reasonable alternatives to the project... an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.” The Draft EIR analyzes a reasonable range of alternatives in Section VII, Alternatives.

As further described in CEQA Guidelines Section 15126.6(c), the reasons for rejecting alternatives from detailed consideration include the following: (i) failure to meet most of the basic project objectives; (ii) infeasibility; or (iii) inability to avoid significant environmental impacts. The Draft EIR discusses the selection of alternatives and identifies alternatives considered but rejected, including a Regional Park option alternative, in Subsection 3.2 of Section VII, Alternatives on page 1263. As indicated, such an alternative would fail to meet nearly all of the Proposed Project’s basic objectives, there is no indication that funding for such an alternative would be available, and implementation of this alternative is considered speculative. Therefore, this alternative was subsequently rejected from further analysis.

It is not clear which housing and job creation assumption is being called into question by the commentor. The Draft EIR provides the methodologies used to calculate the jobs/housing balance in Section IV.J, Population, Housing and Employment on page 742.

#### **Comment 166-15**

For the above reasons, and in consideration of how little habitat and open space is left in the Los Angeles area, as well as the sensitivity of the Ballona watershed and Gabrielino-Tongva village and burial areas, it is incumbent upon the City of Los Angeles to engage in the Federal EIS process before allowing the Playa Vista Phase 2 development to go forward.

#### **Response 166-15**

Section IV.D., Biotic Resources, of the Draft EIR addresses impacts of the Proposed Project on biotic resources, including the Ballona Wetlands. Section IV.P.(2), Archaeological Resources, addresses the impacts of the Proposed Project on archaeological resources and proposes mitigation measures, which when implemented would reduce impacts to a less-than-significant level.

As discussed in Subsection 2.1.1.1 of Section IV.D, Biotic Resources, of the Draft EIR on page 523-524, in 1992, the Corps issued Permit No. 90-426-EV under Section 404 of the Clean Water Act for the “fill of a total of 16.1 acres of disturbed wetlands in various portions of the former Playa Vista Planning Area, including the Proposed Project site, for construction of the Freshwater Wetland System and a mixed-use development.” No further federal permit is required to implement the Proposed Project. As a result, a “Federal EIS” process is not necessary.

**Comment 166-16**

The City has allowed illegal activities to occur during the CEQA process, and has then sanctioned those activities by issuing permits to cover them. The current DEIR is defective and the State CEQA process is not being properly followed. I therefore object to the unproven conclusions of the Playa Vista Phase 2 Draft EIR, and urge that a Federal EIS process begin, that would address these important issues that remain unanswered, and restore public confidence in the environmental review process.

**Response 166-16**

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase construction activities. All activities have been conducted in compliance with local, state, and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

As discussed in Subsection 2.1.1.1 of Section IV.D, Biotic Resources, of the Draft EIR on page 523-524, in 1992, the Corps issued Permit No. 90-426-EV under Section 404 of the Clean Water Act for the “fill of a total of 16.1 acres of disturbed wetlands in various portions of the former Playa Vista Planning Area, including the Proposed Project site, for construction of the Freshwater Wetland System and a mixed-use development.” No further federal permit is required to implement the Proposed Project. As a result, a “Federal EIS” process is not necessary.

**LETTER NO. 167**

Joe Ravetz  
600 Harbor Street, #7  
Venice, CA 90291

**Comment 167-1**

I'm a longtime resident of Los Angeles, now living in Venice, and I can see that the Playa Vista project is not only a huge mistake environmentally, but it is also putting a terrible burden on the local area. Our streets are often grid locked, and more cars are on their way if Playa Vista Phase II is approved.

I'm against the approval of Phase II of Playa Vista. It makes no sense to approve Phase II before we know the full impact of Phase I. I hope you and the L.A. Planning Dept. will consider my deeply felt antagonism to Playa Vista and vote against it if given the opportunity.

Thank you for considering residents needs over that of the developers in this crucial battle to save our coastline.

**Response 167-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project. A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

**LETTER NO. 168**

Mollie Reeves  
13856 Bora Bora Way, #105C  
Marina del Rey, CA 90292

**Comment 168-1**

I don't know much about development in Los Angeles, but I have to guess that few developers are doing as much as Playa Vista to improve situations outside their development's borders.

The Environmental Impact Report for The Village examines more than 200 intersections, plus freeways, to determine the project's impact on 100 square miles of the local and regional transportation systems. That is a huge area! Furthermore, Playa Vista is paying for new buses to encourage public transportation.

To improve our education system, the developers have adopted schools in the area, providing students with scholarships and top-notch arts programs. Within the development, four acres in the first phase have been set aside for a new public school. Between the first phases and The Village, Playa Vista will be contributing approximately \$28 million in fees to the Los Angeles Unified School District.

The parks that are already in place at Playa Vista are gorgeous, and I know The Village's parks will be just as attractive. These are also public benefits, as they will be open to everyone, not just the development's residents.

Playa Vista is doing more than its share to make the Westside a better place. Approve The Village!

**Response 168-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 169**

Michael A. Reifel  
happyjoyousfreeindian@yahoo.com

**Comment 169-1**

As a resident of Los Angeles, who values and enjoys the natural beauty of our area. [sic] I implore you and your fellows to take a long and hard look at what is being attempted on the West Bluffs which directly affects the wetlands.

**Response 169-1**

This comment does not address the Proposed Project; rather, it is in reference to a separate project, which is considered in the Draft EIR as a related project (Related Project 24). The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 170**

John Reynolds  
3217 17th Street  
Santa Monica, CA 90405

**Comment 170-1**

I am a resident of Santa Monica living in Sunset Park which is located in the southwestern sector of Santa Monica. I read part of the EIR for Phase II of the Playa Vista project and found that it was irresponsibly lacking in detail regarding the impact the project would have on street traffic on Lincoln Blvd. north of Washington Blvd. and completely ignored Santa Monica Airport operations. Where [*sic*] any traffic cut through traffic studies conducted for Sunset Park? If yes, what were the findings whether reported or not? If no study was conducted, why not?

**Response 170-1**

The commentator states that the Draft EIR was “lacking in detail regarding the impact the project would have” on Lincoln Boulevard north of Washington Boulevard. In fact, the traffic study analyzed all signalized intersections along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard, and all arterial intersections north of Venice Boulevard to the I-10 Freeway. A total of seven intersections along Lincoln Boulevard north of Washington Boulevard were analyzed: Lincoln Boulevard/Venice Boulevard, Lincoln Boulevard/Rose Avenue, Lincoln Boulevard/Ocean Park Boulevard, Lincoln Boulevard/Pico Boulevard, Lincoln Boulevard/I-10 eastbound ramps, Lincoln Boulevard/I-10 westbound ramps, and Lincoln Boulevard/Wilshire Boulevard. The Draft EIR determined that the Proposed Project would have a significant impact at Lincoln Boulevard/Venice Boulevard before mitigation, but would not have significant impacts at the intersections north of Venice Boulevard. With implementation of the proposed mitigation measures, all significant impacts along Lincoln Boulevard would be mitigated to a less-than-significant level. See Figure 65 on page 809 of the Draft EIR for a map illustrating all of the study intersections. Please see Topical Response TR-7, Study Intersections, for more detail.

Potential impacts from the Proposed Project on residential streets are addressed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 872. The Draft EIR concludes that the Proposed Project will not have a significant impact on the neighborhood streets in the Sunset Park area referenced in the comment. Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, which provides a more detailed discussion of the neighborhood traffic impact analysis.



**Comment 170-2**

I am concerned that Santa Monica Airport traffic will increase as a result of the build out of this project. I didn't see any evidence of SMO airport operations mentioned in the report. What is the estimated increased airport traffic from Playa Vista I and II?

**Response 170-2**

Santa Monica Airport has no commercial service, so a general increase in population at the Proposed Project will not necessarily lead to any increase in use at the airport. To the extent that a general increase in population at the Proposed Project will lead to increased private general aviation traffic at the airport, there is no reasonable way of measuring the prospect of private use of civil aviation. The airport imposes flight and noise restrictions which would apply to any resident at the Proposed Project, such as the Single Event Noise Exposure Level (SENEL) restriction contained in Section 10.04.04.060 of the Santa Monica Municipal Code. There are also curfew and other restrictions described in Chapter 10.04 of the Municipal Code. Uses and limitations upon traffic at the airport are within the jurisdiction of the Federal Aviation Administration and, to some extent, the City of Santa Monica.

**Comment 170-3**

I urge you to have the developers do a more thorough job of assessing the impact their construction will have on Sunset Park and Santa Monica Airport and report these finding [*sic*] to the City of Santa Monica and the neighborhood associations that work so closely with the city to protect our quality of life.

**Response 170-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Please refer to Responses 170-1 and 170-2.

**LETTER NO. 171**

Mary Ballou Richert  
2200 Vanderbilt Lane, #22  
Redondo Beach, CA 90278

**Comment 171-1**

I apologize for the last minute support letter for The Village at Playa Vista. However, I believe that this deveopment [*sic*] will be a great asset to the community. I also believe that this development has been very well planned to work with the surrounding area, especially considering the environmental issues which encompass the entire Playa Vista project.

If you need any additional comments, please feel free to contact me at 310-664-7920. Thank you.

**Response 171-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 172**

Riggs Place Neighbors  
Mark S. Ludwig  
Mary Jane Ludwig  
6373 Riggs Place  
Westchester, CA 90045

Back B. Weinger  
Alyce Weinger  
6367 Riggs Place  
Westchester, CA 90045

Herman Eisen  
Marge Eisen  
6376 Riggs Place  
Westchester, CA 90045

**Comment 172-1**

We are writing as long-time residents of Westchester to express our concerns and opposition to the approval of the Playa Vista Phase II Development as proposed. Our concerns are as follows:

1) With the increase in traffic that this proposed project will undoubtedly generate, we believe that traffic mobility in the entire area surrounding the project will be greatly compromised. In fact, intersections within a 3-5 mile radius of Playa Vista will become completely gridlocked. “Traffic mobility” has already become an oxymoron when used to describe many of the area’s streets, intersections and freeways.

**Response 172-1**

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study areas described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This

new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 172-2**

2) Helicopter flights to and from the project should be limited to only [e]mergency situations. Should this project go forward as proposed, and street traffic becomes the nightmare we believe it will, the temptation to utilize alternative means of travel will be quite appealing to busy executives and others with the financial wherewithal to do so. Air traffic noise generated by existing helicopter flights is already a nuisance.

With any increased air traffic by helicopters, ambient noise levels will rise substantially. This is unacceptable. We could also expect a result to be further degradation of our air quality, and will have a profound impact on our quiet enjoyment of our homes.

### **Response 172-2**

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

Section 15002 of the State CEQA Guidelines states that the basic purpose of CEQA is to inform governmental decision-makers and the public about the potential, significant environmental effects of a proposed project. No changes to heliport operations are proposed with implementation of the Village at Playa Vista, with the exception of the elimination of one heliport within the boundaries of the Proposed Project. Therefore, there would not be any impacts from heliport operations as a result of the Proposed Project.

Subsection 2.2.5 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 715-717 identifies two heliports currently permitted within the adjacent Campus portion of the previously approved Playa Vista First Phase Project. The Campus is envisioned to provide corporate headquarters-type facilities; as such, one or both of these heliports could become operational in the future to serve corporate executives. The impacts associated with opening one or more of the heliports at Playa Vista were addressed in the 1995 approvals of the Campus at Playa Vista, and are not an issue under consideration at this time. The study performed at that time, "Helistop Noise Study for Playa Vista, has been included in the Appendices of the Final EIR.

There is no evidence (i.e., facts, reasonable assumptions predicated upon facts, or expert opinion supported by facts) to support a claim that buildout of the Proposed Project would result in an

increase in helicopter use. Any attempt to analyze such a relationship would be speculative. Pursuant to CEQA Guidelines Section 15145, “[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.” Given the speculative nature of this particular issue and its potential impacts, no further discussion of this issue is required.

**Comment 172-3**

3) We anticipate significant drains on our area’s infrastructure, despite Playa Vista’s proposed mitigations.

**Response 172-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers prior to any approval action on the Project.

The Draft EIR provides a detailed analysis of the potential impacts of the Proposed Project on infrastructure in Section IV.C.(1), Hydrology, Section IV.M, Energy Consumption, and Section IV.N, Utilities. As indicated therein, with mitigation, impacts would be less than significant.

**Comment 172-4**

4) As we understand the proposed project, many views will be greatly compromised, and if not obstructed entirely by the buildings themselves, prime city and ocean views could be reduced to front-row views of rooftop support equipment such as A/C units, generators, helicopter pads, etc. Blufftop views should be preserved in their entirety, at any and all costs.

**Response 172-4**

The impact on views from bluff top locations is analyzed in Subsection 3.4.2.2 of Section IV.O, Visual Qualities (Aesthetics and Views), of the Draft EIR on page 1174. As indicated, maximum building heights would be approximately 28 feet below the top of the bluffs, and there would be no impacts on mid to far-range views (city and ocean views). Impacts would be less than significant.

**Comment 172-5**

While there are numerous other issues troubling us, lack of time is precluding us from commenting on those in this communication. However, we hereby request that Playa Vista Phase II not be approved as currently drafted.

Thank you for your time and your consideration of our concerns.

**Response 172-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 173**

Ernest Roberts  
1944 Virginia Road  
Los Angeles, CA 90016

**Comment 173-1**

I am writing to express my support for the approval of the Village at Playa Vista. Our city desperately needs to foster communities in which residents can live and access retail and services within the same area. Playa Vista has proven that it is committed to providing its residents with beautiful, efficient and environmentally friendly living spaces, and will continue to pursue the same policy in its next phase--the Village.

One of the attractive elements of becoming part of the Playa Vista community is the expectation that restaurants, retail shopping and grocery and other service outlets would be available within a short distance. It is my hope that the City will approve the Village, and complete this model project.

**Response 173-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 174**

Eva Roberts  
4050 Marcasel Avenue  
Mar Vista, CA 90066

**Comment 174-1**

I am horrified at the prospect of all the new cars on the west side that Playa Vista will generate. Please don't ruin our lives with so much pollution, noise, and overcrowded streets.

**Response 174-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Pursuant to State CEQA Guidelines, the Draft EIR analyzes the impacts of the Proposed Project and where necessary proposes mitigation measures to address the Project's impacts. Potential impacts on air quality associated with the Proposed Project are addressed in Section IV.B of the Draft EIR, beginning on page 270. Potential noise impacts associated with the Proposed Project are addressed in Section IV.E, Noise, of the Draft EIR, beginning on page 553. Potential traffic impacts associated with the Proposed Project are addressed in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 798.



**LETTER NO. 175**

Phil Roberts  
891 Washington Street  
El Segundo, CA 90245

**Comment 175-1**

When planning and city officials evaluate the Village at Playa Vista, I hope they will consider what the site looks like now. Yes, it is open space, but it is far from pristine and scenic. The land has been home over the years to ranching, oil and aerospace operations. In recent years it has become an eyesore in the community, a vast expanse of cracked asphalt, weeds and abandoned buildings.

Building the Village will make good use of the land. Playa Vista has plans for an attractive, architecturally diverse, balanced community that respects the environment and the surrounding area. Approve the Village!

**Response 175-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 176**

Walter Roessner  
3651 Barry Avenue  
Los Angeles, CA 90066

**Comment 176-1**

I am a resident of Mar Vista, living near Venice and Inglewood Blvds. My concern about traffic mitigation in the present situation of Phase 1 is that traffic in this area, especially along Inglewood Blvd, a narrow artery that comes north from Jefferson Blvd, is already showing signs of increased traffic from Venice to Palms Blvd. And Phase 1 is not yet finished nor fully occupied.

I think that the Playa Vista builder's claims for Phase 2 that traffic in residential areas such as this will be negligible are bogus.

Please make them re-evaluate their traffic mitigation plans, or do away with Phase 2 altogether.

**Response 176-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts.

The commentator raises comments relating to the existing traffic conditions on Inglewood Boulevard. Such traffic would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812.

The Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed in Subsection 3.4.7, the Proposed Project would not result in any significant impacts on neighborhood traffic in the Mar Vista area.

**LETTER NO. 177**

Michael & Kathleen Rogers  
3624 Inglewood Boulevard  
Los Angeles, CA 90066

**Comment 177-1**

We respectfully submit the following comments regarding the proposed Phase 2 of the Playa Vista development. The focus of our comments is on traffic.

1. Phased Development—Phase 2 of Playa Vista should not be approved before Phase 1 is constructed and occupied and its true traffic implications are known. It is not uncommon for large developments to be required to develop in phases, so that their impacts can be monitored and assessed post-occupancy, and unsuspected consequences, such as more traffic than anticipated, can be addressed through either new mitigation, revised mitigation or reduced development among future phases. One nearby development that has their ability to develop future phases linked with the proven success of traffic mitigation is the Howard Hughes Center. This should also be the case here.

**Response 177-1**

The Draft EIR takes into account development of the Playa Vista First Phase Project as part of the 2010 baseline condition. The Draft EIR's traffic analysis uses a nationally recognized transportation model to assess potential traffic impacts. This model was calibrated taking into account SCAG regional projections and a list of related projects provided by jurisdictions within the study area, including the Playa Vista First Phase Project. Please see Topical Responses TR-1, Playa Vista Transportation Model, and TR-9, Traffic: First Phase Project (VTTM 49104) Condition No. 116, on pages 451 and 470, above, for a more detailed discussion of these issues.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 177-2**

Ongoing Monitoring—As a condition of Phase 2 development, both Phases 1 and 2 should be required to conduct and submit to the LADOT traffic monitoring reports at least twice per year, on an ongoing basis. The monitoring should be based on established vehicle trip limits at the driveways. This will enable:

2.a. Assessment as to whether project vehicle trips are at their projected, post-mitigation level, or if new remedies are needed, including reduced development.

2.a.1. People are skeptical, for example, of the ability of new bus seats to address significant traffic impacts. This skepticism has merit given the lack of well-connected transit service in the project area. It is of even greater concern if this mitigation is based on the changed behavior of others outside of the project to leave their cars behind and ride public transit. The project should only be able to claim credit for transit usage among project occupants, the success of which could be determined through broader monitoring efforts of vehicle trip limits and driveway counts.

Vehicle trip limits should be established for the AM peak hour, PM peak hour, and daily total. Again, this is not an uncommon requirement for new developments, and we believe UCLA and Fox Studios are two such examples.

### **Response 177-2**

The analysis in the Draft EIR used methodologies consistent with City of Los Angeles procedures to estimate the effectiveness of the mitigation measures. In accordance with CEQA, the Draft EIR analyzes the potential significant impacts of the Proposed Project and identifies feasible mitigation measures to mitigate those significant impacts. The ongoing monitoring suggested by the Commentor is not necessary to mitigate any significant impact identified in the Draft EIR. The ITE trip generation rates used in the Draft EIR are the industry standard rates used by transportation agencies throughout the nation, including the City and County of Los Angeles, the City of Culver City, and numerous other cities throughout Southern California to estimate trip generation for projects. The City of Los Angeles does not normally require subsequent investigations or verification studies. Rather, the goal is to use reliable information to assess the Proposed Project's impacts prior to consideration of the Proposed Project by decision-makers.

The proposed transit enhancement mitigation measures are designed both for use by Playa Vista residents and employees, and to meet the existing and future demand of transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the proposed mitigation would be effective to reduce potentially significant impacts to less than significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections. For a more detailed discussion of the effectiveness of the transit mitigation measures, please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, above.

### **Comment 177-3**

3. Residential Street Analysis—The impact of Phase 2 development on residential streets to the north of the project should be carefully analyzed. A similar analysis should also be conducted of the completed and occupied Phase 1 development, based on actual project trip generation and distributions before Phase 2 is approved (Refer to comment 1). Of particular concern to us and our neighbors is the impact to the residential portion of Inglewood Boulevard. Although Inglewood Boulevard is a designated secondary highway northward from Playa Vista to Venice

Boulevard, it is a residential street north of Venice Boulevard. The residential portion of Inglewood Boulevard is already known to experience spill over traffic among motorists attempting to bypass congestion on Centinela and on the I-405 freeway. How is it expected that residents and visitors of Playa Vista will behave any differently, especially with driveways that open out onto Centinela and at Inglewood Boulevard? In approving both Phase 1 and 2 of Playa Vista, the City and applicant have a responsibility to protect residential streets such as Inglewood Boulevard from significant traffic impacts, and to conduct ongoing monitoring counts to this end (e.g., project driveway and distribution counts in conjunction with residential street counts that are compared to pre-development baseline volumes).

### **Response 177-3**

Potential impacts from the Proposed Project on residential streets are addressed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872. The Draft EIR concludes that the Proposed Project will not have a significant impact on cut-through neighborhood traffic in the area referenced in the comment. Please See Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, above.

With respect to the comments concerning the Playa Vista First Phase Project, it should be noted that the traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/ Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area. Please see Topical Response TR-3, Related Projects, on page 453 above, for additional information.

### **Comment 177-4**

4. Neighborhood Traffic Protection Fund—The applicant should be required to establish a neighborhood protection fund for purposes of financing mitigation measures to protect residential streets from expected or later identified traffic spill over caused by Phase 1 and Phase 2 of the project.

Thank you for your attention to this matter and your consideration of our concerns.

### **Response 177-4**

A neighborhood traffic impact analysis was conducted as part of the analysis of potential traffic impacts for the Proposed Project; the findings of this analysis and proposed mitigation can be found in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872 and on page 903. Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, above.

The LADOT Assessment Letter (Appendix K-1, page 7) states that funds would be deposited by the project into a LADOT-managed account for implementation of neighborhood traffic management measures. In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

**LETTER NO. 178**

Sara D. Roos  
3748 Mountain View Avenue  
Los Angeles, CA 90066

**Comment 178-1**

The impact of the Play Vista proposal will be enormous on the residents of Mar Vista, where I live with my family. Our streets are currently overloaded beyond the point of safety—noise, congestion, [and] pollution impacts are currently nearly unbearable. Adding thousands and thousands more trips will impose a worsening in the quality of life here that is hard to contemplate.

Ignoring the impacts of this proposal on our community is unconscionable. In fact, the proposal itself is unconscionable. I don't know how to put a nicer face on this—it's just a stinker of a plan put forth by similarly handicapped individuals; it's hard to know what to object to first.

But for starters, the traffic will be an enormous problem. Building such a behemoth [*sic*] city with no way in or out is the stuff that strange fiction is made of. Until Los Angeles' infrastructure can properly support this colossus, approval for its existence \*must\* be denied!

**Response 178-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of noise in Section IV.E, Noise on page 553, and a detailed analysis of air pollution in Section IV.B, Air Quality on page 270. Also, see Sections II.15, II.8, and II.4, respectively, of the Final EIR for corrections and additions to these sections.

**LETTER NO. 179**

Lee & Marie Roozen and family  
7420 Danfield Avenue  
Los Angeles, CA 90045

**Comment 179-1**

Please stop the notorious Phase 2 development in Playa Vista. Even before Phase 1 in Playa Vista, the traffic and air pollution was horrific, choking our freeways, Lincoln Blvd., noise and air pollution with 100,000 LAX car trips per day without even considering all the other traffic. Can you imagine Phase 1 and 2 adding 70,000 more car trips per day? This will render yours [*sic*] and my communities a much less desirable place to live and will affect traffic for many miles around Playa Vista and LAX. The comment period ends soon so please help our communities as soon as possible and add your voice to opposing Phase 2. Traffic from Phase 1 is just starting the pain right now because it's [*sic*] occupancy is low and getting started. Also, there is danger from explosion, earthquake and fire due to failure of gas mitigation systems. You and we L.A. City taxpayers could be held legally liable for millions of dollars in damages to persons and property. Please stop this environmental disaster in the name of quick and large profits to developers who can greatly influence people in government who are supposed to represent all interests of society. Please reply to Lee and Marie Roozen at [www.Marie.roozen@ngc.com](mailto:www.Marie.roozen@ngc.com) [*sic*].

**Response 179-1**

A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of noise in Section IV.E, Noise on page 553, and a detailed analysis of air pollution in Section IV.B, Air Quality on page 270.

Section IV.E, Noise, identifies a short-term significant impact that would occur during Project construction. Noise impacts from Project operations would be less than significant.



Section IV.B identifies short-term significant construction impacts as well significant impact from Project operations on regional air quality emissions.

A detailed discussion regarding methane is provided in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 700.

It is speculative to assume that “...there is danger from explosion, earthquake and fire due to failure of gas mitigation systems.” Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 711 and 712, discusses the conclusions reached by the CLA Report regarding the adequacy of the methane mitigation system being used at the adjacent Playa Vista First Phase Project. Page 738 of the Draft EIR also addresses in detail the methane safety system for the long-term operation of the Proposed Project. All individual components of the methane mitigation systems currently under consideration for the Proposed Project site are recognized as approved means of methane mitigation by City of Los Angeles Department of Building and Safety (LADBS) and the City of Los Angeles Fire Department (LAFD). Nearly all components have also been used at other sites throughout Southern California. The specific design elements of the methane requirements shall be subject to the review and approval of LADBS in consultation with the LAFD. As described in Appendix J-14 of the Draft EIR, the building mitigation systems are to be maintained and serviced in accordance with LAFD approved protocols. The testing and servicing of the systems is to be performed by a person approved by the LAFD. The approved protocols require that testing and annual maintenance reports are filed with the LAFD. As described under Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 738, prior to issuance of a building permit for individual projects within the Proposed Project site, a methane safety plan shall be submitted to LADBS. The methane mitigation systems in the adjacent Playa Vista First Phase Project site have been monitored and maintained pursuant to the protocols set by LADBS and the LAFD. Reports of such monitoring and maintenance are submitted to LADBS and the LAFD.

See also Sections II.4, II.8, and II.13, Corrections and Additions, of the Final EIR.

The remaining comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 180**

Nancy Ruben  
NancyRuben@adelphia.net

**Comment 180-1**

I am writing to protest the Playa Vista development. I believe that this development will seriously compromise quality of life for all of those living in West L.A. The traffic issues and quality of air problems that will result from this development will be disastrous.

**Response 180-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. Potential impacts on air quality associated with the Proposed Project are addressed in Section IV.B, Air Quality, of the Draft EIR, beginning on page 270. Potential traffic impacts associated with the Proposed Project are addressed in Section IV.K.(1) of the Draft EIR, beginning on page 798. Also, see Sections II.4 and II.15, Corrections and Additions, of the Final EIR.

**LETTER NO. 181**

Bonnie Sachs, ASID • CID  
Certified Interior Designer  
311 Bora Bora Way, Suite 305  
Marina del Rey, CA 90292

**Comment 181-1**

The Draft EIR for The Village identifies plants and wildlife on the property and examines the project's potential impact on them. The report concludes that, with proper measures, The Village will have no significant impacts on plants and wildlife. That is excellent news, but not surprising given the property is an old industrial area that included an airplane runway.

In fact, the overall impact of the Village project on habitat will be beneficial. Currently, the site is a jumble of weeds, cracked pavement, dirt and gravel. The Village plan is expected to add 10 acres of improved habitat for plants and wildlife, and connect habitat areas that are currently fragmented.

On the Westchester Bluffs, rising from the site, the project will be responsible for replacing 5 acres of non-native grasses and ice-plant within the project boundaries with native coastal sage scrub habitat.

Completing the final segment of the riparian corridor will also benefit the excellent natural stormwater treatment program at Playa Vista. This community is a model for others to learn from, but the vision cannot be achieved with The Village.

I look forward to participating in the public hearing process and encouraging the City to approve this important development.

**Response 181-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 182**

Caroline R. Salter  
5625 Crescent Park West, #220  
Playa Vista, CA 90094

**Comment 182-1**

I know very little about the public process and how new housing developments are approved in Los Angeles; however, I know what a good neighborhood is. You can feel it. You can sense it. Walking through the community, you just know it is a good neighborhood

That is how I feel when I walk through Playa Vista. People actually talk to each other here. The parks are all within walking distance. And there is a real feeling of camaraderie among those of us who live here.

The Village at Playa Vista will do even more to solidify our place as one of Los Angeles' great neighborhoods. We are all waiting for the day when we can walk to the dry cleaner or stroll to the barber without fighting traffic.

I am hopeful that The Village will move quickly through the city approval process so that we can continue our evolution and growth as a great neighborhood.

**Response 182-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 183**

Alex Schub  
3670 Mountain View Avenue  
Los Angeles, CA 90066-3129

**Comment 183-1**

I am writing today to urge you to support Playa Vista as a model of urban development in our city.

Unlike many developers, Playa Vista did not develop its 1,087-acre site piecemeal. Left to the devices of lesser developers, we would have been saddled with apartment complexes here and strip malls there, none of which would have been built in concert with each other. This piecemeal development is what has created the disjointed and hodgepodge development we see in many areas of Los Angeles.

To its credit, Playa Vista has weathered the storm of attacks that you might expect would be drawn to a project so large. Through it all, Playa Vista has continued to focus on its mission--to create a comprehensive development that is well thought out and fits seamlessly together. They have spent untold years making sure each kind of housing works well next to another and making certain that each park, library and other amenity fits into the community well.

Furthermore, Playa Vista has already demonstrated through various charitable activities and sponsorships that it is a good neighbor and both a generous and active participant in our community.

Finally, Playa Vista has maximized its open space. With the construction of The Village, 70 percent of the project will be open space and The Village alone includes five new parks.

Perhaps it is the quixotic nature of the Luddites opposed to Playa Vista that causes them maintain their opposition. But theirs is not a reasonable nor reasoned battle. Playa Vista represents exactly the kind of development the City of Los Angeles should support and encourage. It is a precedent that everyone should follow. Thank you.

**Response 183-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 184**

Roberta Sergant  
4313 Mentone  
Culver City, CA 90232-3444

**Comment 184-1**

I am trying to register my opposition to the continuation of the Playa Vista Project. My home and work is in Culver City and I already feel very threatened by the existing development. Our main thoroughfares are now backing up at every signal. Overland and Braddock, near where I live are overflowing. Local citizens are trying to protect their residential areas by having more speed bumps installed, thus pushing more traffic to the main roads.

I teach in CC and have been very concerned about the absence of a school for the kids of Playa Vista. Our school is at full capacity and we have a waiting list of over 100 in September. I have read about how the P.V. kids will attend 5 local schools, but these will NOT be in walking distance, so that means more traffic from parents or buses or both.

**Response 184-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1) of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response No. TR-1, Playa Vista Transportation Model, on page 445, above.

Section IV.L.(3) on page 997 of the Draft EIR analyzes the Project's potential impacts on public schools. The Los Angeles Unified School District (LAUSD) has established attendance boundaries for each of its schools. Based on information provided by the LAUSD, the Project site is currently located within the attendance boundaries of Playa del Rey Elementary School, Marina del Rey Middle School and Venice High School. These are the schools that would accommodate the Project's school age children, notwithstanding inter-District transfers. While inter-District transfers are possible, they account for a very small percentage of the students attending any particular school. As such, schools other than the three noted above are not anticipated to be needed to accommodate the public school students generated by the Proposed Project.

### **Comment 184-2**

The design of the existing bldgs may be lovely inside, but it is horrendous [sic] for those of us who live outside the fortress. Indeed, the first development is a nightmare... it looks like a high security [sic] prison or future "project." It is dreary, no more than a yard or so of "yard" standing formidably over Jefferson and Lincoln Blvd like an ominous threat, more than a neighbor.

I urge the powers who be to stop further development of Playa Vista. Let's create some more parks for kids to play in, perhaps one school, and that is that. NO MORE DEVELOPMENT. My students and I already inhale enough soot and black deposits to have several of my asthmatics out for extended absences and/or stays in the hospital.

### **Response 184-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR includes a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148, and a detailed analysis of air pollution impacts in Section IV.B, Air Quality on page 270.

**LETTER NO. 185**

Linda Shafritz  
6128 West 75th Place  
Los Angeles, CA 90045

**Comment 185-1**

After seeing how much the Playa Vista Project has changed for the better over the years, I cannot imagine anyone who is not in favor of this project continuing forward.

It was not that long ago that there were office buildings and hotels planned for the wetlands and a whole new finger to the marina that would have destroyed some of the last remaining open space on the Westside. It would have been a giant business area, like Century City.

Today's Playa Vista is a smaller and more responsible development that addresses everything the community has asked for: protecting the area west of Lincoln Boulevard as open space, new parks throughout the residential area, scaling down the commercial portion of the project, and providing some cute shopping and dining places.

The Village at Playa Vista will have opportunities for all the area's residents to enjoy, and benefit from. I urge the City of Los Angeles to approve The Village at Playa Vista and its environmental impact report. My husband and I have lived one half mile up the hill, in Westchester, for 22 years and raised two children there. If I am in support of this project, who wouldn't be?

**Response 185-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 186**

Diane Shapiro  
5701 South Kiyot Way, #3  
Playa Vista, CA 90094

**Comment 186-1**

I am sure that you are receiving many letters about Playa Vista and The Village, but let me be very blunt about the importance of approving the shops and restaurants that make up The Village. The Village is why many of us moved to Playa Vista in the first place.

We were promised a lifestyle where we could walk to work, walk to a marsh teeming with birds and wildlife and walk to the local market. So far, we know that at least two of those things will be a reality. The third is up to you and the City of Los Angeles.

Walking to the local market and to other neighborhood shops is important to every resident of Playa Vista and should be important to the City Council as well. Getting us off the streets benefits everyone who drives in the surrounding community, and being able to walk to the market is tremendously appealing to those of us who will be able to it.

We waited a long time to live at Playa and we hope you will support our community. We are not asking for much.

The Village is a win-win proposition for everyone.

**Response 186-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 187**

Stephen E. Shepherd  
Richard Moon & Associates  
5959 West Century Boulevard, Suite 950  
Los Angeles, CA 90045-6517

**Comment 187-1**

I am writing regarding the developments at Playa Vista in West Los Angeles. I strongly support their current development plans. Not only will The Village at Playa Vista greatly enhance the difficult housing shortage issues in West Los Angeles, but also it considerably enhances the contribution and beauty of the Playa Vista community to Westchester. In addition, it will continue enhancing the local business community, which has greatly suffered in the aftermath of September 11th.

With residential occupancy, The Village at Playa Vista will be a unique community where people can live where they work. They can take electric shuttles or walk to cafes, markets and bookstores without ever venturing onto the surrounding city streets. What is more, approval of The Village will mean that the natural habitat restoration along the base of the Westchester Bluffs will be completed as well. The balancing of the development on the environment, meeting the needs of the community, and revitalizing the dead ecological area of Balloon Creek and the Bluffs add immeasurable value to the community. No other private developer or government agency was willing to take on this major perpetual restoration of the environment damage from prior owners of the properties.

The Village is clearly the missing link that will unite the residential area already under construction near Lincoln and Jefferson with the commercial area at the far east end of the project.

I support The Village and so do my friends and neighbors. We look forward to seeing it built as soon as possible. I appreciate your agency diligence in community input to your evaluation of the outstanding enhancement to West Los Angeles.

**Response 187- 1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 188**

John Sheppard

**Comment 188-1**

Our office has followed the project from its early stages. We have met with developers, local community activists, environmentalists and impacted staff. Because the project has been down-sized and there has been adequate notice of issues and changes as well as participation from all interested parties, there are no major concerns that I would make comment on.

The EIR seems to reflect the said inputs.

We do however, stress that the developer continues to support recommendations made by the City's Sanitation Bureau and the Department of Transportation.

Recommendations like the development and maintenance of the fresh water marsh, associated streams and the use of best management practices as each phase is developed should be observed and delivered as agreed upon.

Maintenance of the existing and planned transportation infrastructure and the developers willingness and ability to address and mitigate unforeseen [*sic*] traffic patterns/problems that result from or are associated with the projects development and or use must be observed and delivered.

**Response 188-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 189**

Mickey Shockley  
12460 Lucile St.  
Los Angeles, CA 90066

**Comment 189-1**

I have lived in the immediate area of Centinela and Jefferson Blvds. since 1954. I have seen the area change from quiet and and [sic] peaceful to noisy [sic], smelly, and hectic these past 50 years. The major reason TRAFFIC ..... and its [sic] just the beginning!!!!

I do not accept the statement from Playa Vista that “the people that will live here will work here in Playa Vista, and will not be driving to and from their jobs ... Wrong! ... If they work in Santa Monica, Beverly Hills, Westwood or where ever, they will drive and contribute to the traffic. Californian’s [sic] drive, no matter where they live!

**Response 189-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As shown on Figure 71 on page 861 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, the majority of the project trips have been assigned to the external roadway network, their impacts analyzed and mitigation measures proposed and evaluated as part of the Draft EIR analysis. The internal trips were assigned to the internal roadway system being constructed as part of the Proposed Project. Approximately 3.9 percent and 2.7 percent of the total A.M. and P.M. peak-hour trips, respectively, would be internal trips within the Village at Playa Vista site.

**Comment 189-2**

Howard Hughes would have saved the hanger [sic] of the Spruce Goose for a museum and developed a park beyond all others in Southern California. It would have been world renowned. His name would be praised for saving this huge parcel of prestine [sic] land for all to enjoy, had he lived. A park instead of Playa Vista: Open land!

It can still be a tremendous park if Playa Vista will forfeit some of their Village, and Business Section. Playing fields and even build an Olympic size swimming pool, where children and adults can learn to swim, and swimming competitions can be held. Water safety is a must for all, especially Californians. I request that a swimming facility be available for the public.

**Response 189-2**

For clarification, the Spruce Goose building (Building No. 15) is part of the Campus at Playa Vista, which is part of the First Phase Project. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 189-3**

With a park there would not be as much traffic daily, as there will be with additional office buildings and the Village. The entrance to Playa Vista at Jefferson and Centinela with wide lanes and plenty of room is acceptable, however Centinela cannot handle the tremendous overload of traffic. There must be other streets constructed to handle all the traffic that will be coming and going into the Playa Vista area. Until they are established and constructed, the building of additional facilities in Playa Vista should be discontinued.

**Response 189-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As shown in Figure 4 of Section II.B., Project Characteristics, of the Draft EIR on page 155, the Village at Playa Vista will include a grid network of internal streets including Bluff Creek Drive (a secondary arterial), Millennium, Westlawn Avenue, McConell Avenue, and Second Street within the site.

**Comment 189-4**

RELATED TO PLAYA VISTA AND THE INCREASE OF TRAFFIC TRAFFIC [*sic*]  
PROBLEMS IN THE IMMEDIATE AREA OF CENTINELA, JEFFERSON, AND  
GROSVERNOR BLVDS. SUGGESTIONS TO BE CONSIDERED.

PROBLEMS; SPEEDING-CUTTING THROUGH SIDE STREETS & ALLEYS  
TO AVOID THE CORNER OF CENTINELA AND JEFFERSON BLVDS.

**CENTINELA:**

Speed limit signs of 35 mph Southbound on Centinela. The one sign that is posted is behind a telephone pole. Needs to be moved south for better observation. Needs enforcement. Speed limit sign 35 mph going North. The speed limit sign 25 mph school zone is ignored. Cars, trucks and semi trucks race thru to beat the signal at Lucile St. This signal needs to be longer for people to cross the street, it is very dangerous for school children and seniors.

**JUNIETTE:**

West side of Juniette at Centinela needs street painted stating "keep clear" so cars can exit Juniette going North or South. Vehicles getting gas at the corner use the alley to exit. Note: We

had a sign posted at the alley and Juniette “Do Not Enter One Way” which has helped stop the speeding through out the alleyways parallel to Centinela (West side), and has discouraged cut-threw [*sic*] cars and trucks.

**GROSVENOR BLVD:**

Needed, a Blvd. [s]top sign ON Grosvenor at Beatrice St. Speeding cars on Grosvenor--Posted 35 mph North bound prior to the residential homes, and Southbound to slow speeding cars to Jefferson.

**WESTLAWN:**

Needs to be widened and have two left turning lanes on to Jefferson to move employee traffic out of industrial area.

**ALLA ROAD:**

There must be other streets to unload traffic coming and going into the Playa Vista area other than Centinela and Lincoln Blvd. Playa Vista has known this for years and has ignored it. In dire emergencies the streets are not developed to handle a major problem. A bridge over the Ballona Creek is the only access available at Alla Road. Beethoven and McConnell are the only other streets if a bridge could be constructed in those areas.

**Response 189-4**

All of the suggestions stated in this comment are current operational issues that are handled by the LADOT’s District Operations office. The comment is noted and will be forwarded to the LADOT’s District Operations office in West Los Angeles for their review and consideration.

**Comment 189-5**

**SHORTCUTS AND ALLEYWAYS--ARE BEING USED TO AVOID THE CORNER OF CENTINELA AND JEFFERSON BLVDS.**

In Los Angeles County -The alleyway that runs parallel to Centinela North and South is a cut thru for many vehicles. There have been numerous accidents at the alley and Lucile St. which is a signal street. Homeowners need Blvd. Stops at the alleyways and their streets to make a safe crossing to Centinela. Blvd. Stop signs on both the North and South sides of the alley on Beatrice, Lucile, Aneta, and Hammack Sts. in order to stop the speedway and shortcut drivers.

Knowing what the future plan of the area was going to become, the homeowners in this section of Los Angeles County, paid to have their streets all Cul-de-saced [*sic*] in 1985, completed in 1988. Therefore we have no through traffic. But we do have people that do not pay attention to the signs, speed down our streets thinking they can get through, then speed back out. There are truck drivers that ignore signs even load limit signs. Lucile Street is traveled more because it is a signal street. Our request is: On the overhanging sign that states its [*sic*] Lucile St we want an additional sign that says NO EXIT OR NO OUTLET on both sides so that drivers see it BEFORE they turn left or right into out [*sic*] street, and adding an arrow might help too. These

cars, trucks, and semi trucks, cement trucks, etc. are all trying to avoid the hectic corner of Centinela and Jefferson. More traffic into Playa Vista is effecting [sic] our lives, and it is only going to get worse. So correct it now! Signs are also needed on the street name signs for all four street [sic] , which does include Juniette St. I am enclosing a drawing of what our area needs.

Juniette street West bound, is used, then over the entry to the church, over the parking lot and down to the alleyway in the back of the apartments on Jefferson. Cars and trucks speed up and down this alley to gain access [sic] to the industrial area to the West, and turn on Grosvenor. All this to avoid the corner of Centinela and Jefferson, and the entrance to Playa Vista in the near future.

Many years ago when Playa Vista first began, I attended a meeting that was to inform the local residents of what the plan for the area was going to look like. I looked at the plan and asked “What about the traffic?” The answer I received “Thats [sic] not our problem, its up to the Los Angeles County Road Dept.”

Well, NOW IT IS YOUR PROBLEM AND OURS TOO! So you had better solve it before you build The Village, or anything more!!!!

#### **Response 189-5**

The suggestions stated in this comment are current operational issues that are handled by the LADOT's Operations office or the County Department of Public Works. The comment is noted and will be forwarded to the respective jurisdictions for their review and consideration.

#### **Comment 189-6**

Mr. Shockley's street sign proposals are provided on the following page.

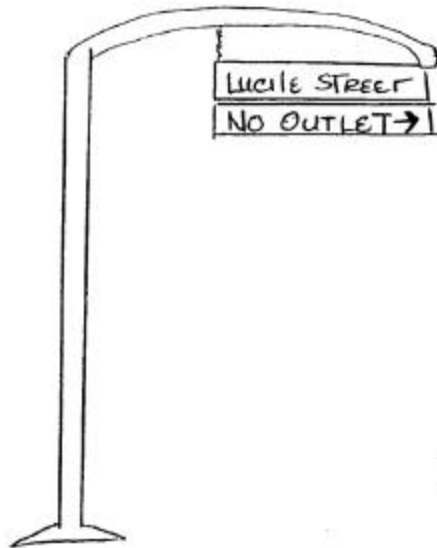
#### **Response 189-6**

This attachment was submitted in support of comments stated in Comments 189-4 and 189-5. As such comments related to this attachment are addressed in Responses 189-4 and 189-5.

To Playa Vista EIR  
from Shockley, Mickey

- 4 -

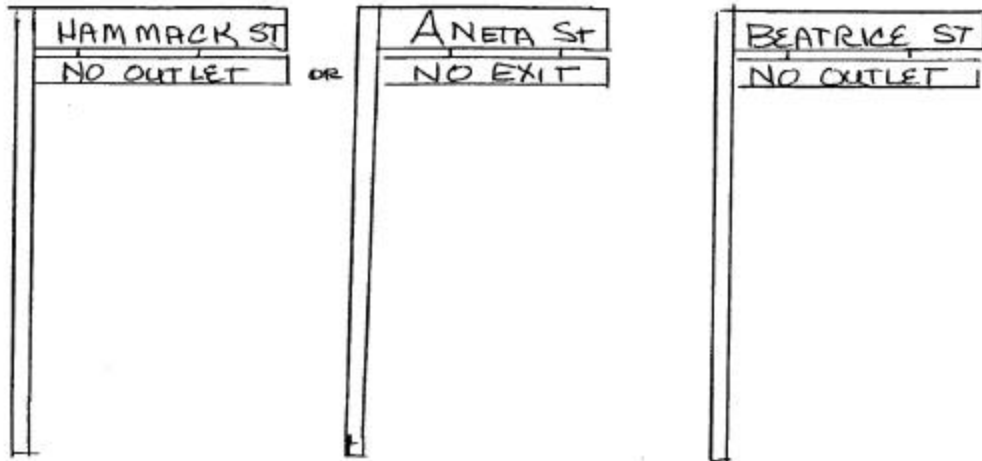
PROPOSAL #1 ON LUCILE ST.



SIGN STATING EITHER  
NO OUTLET → GOING SOUTH  
OR ON CENTINELA  
NO EXIT →  
AND  
← NO OUTLET GOING NORTH  
← NO EXIT ON CENTINELA

2 SIGNS- ON EACH SIDE  
OF SIGN

PROPOSAL #2 ON HAMMACK ANETA BEATRICE & JUNIETTE.



POSTED ON EACH SIDE OF SIGN



**LETTER NO. 190**

James R. Smith  
Post Office Box 644  
Venice, CA 90294

**Comment 190-1**

Perhaps no location could be worse suited for the Playa Vista Phase II development than the Ballona Gap, “an ancient floodplain.” Lurking directly beneath the surface, scientists conjecture, may be the Compton-Los Alamitos Fault.

**Response 190-1**

As discussed in Subsection 2.2.2.2.1 of Section IV.A, Earth, of the Draft EIR on page 224, the Compton-Los Alamitos Fault may pass beneath the Proposed Project site at a depth of 3 to 6 miles below the ground surface. As discussed in Subsection 2.2.2.2.1, recent geotechnical studies (2000 and 2001) performed by Earth Consultants International and Davis and Namson Consulting Geologists concluded that there is no evidence of surface or shallow subsurface faulting at the Proposed Project site, and, therefore, the potential for surface rupture is considered extremely low (See Appendices D-4 and D-5 of the Draft EIR). Given the depth of the fault, the potential for surface fault rupture hazards to structures or people at the Proposed Project site is considered extremely low. The potential for groundshaking impacts to the Proposed Project in the event of an earthquake along this fault would be no greater than groundshaking impacts from any other local fault, since seismic waves propagate from earthquake epicenters radially to all surrounding areas.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 190-2**

In addition, according to the Report, “The City of Los Angeles General Plan Safety Element indicates that the Playa Vista area is subject to potential liquefaction and the Proposed Project site is within an official Liquefaction Zone” (Page 183, Village at Playa Vista Draft EIR, August 2003).

**Response 190-2**

Liquefaction hazards at the Project site are addressed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256. As indicted in the Draft EIR, there exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project

site. As part of the issuance of building permits by the City's Department of Building and Safety for individual structures, site-specific geotechnical investigations are required. Given that the City's Department of Building and Safety requires site-specific investigations (including liquefaction risk assessment) prior to construction, and the application of engineered fill soils in building pads would address the potential for liquefaction directly under structures, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

### **Comment 190-3**

The Report also acknowledges that the proposed project is in an area of poor air quality, with elevated air pollution levels, but draws no negative conclusions about adding a development that will dump additional large amounts of pollutants into our air.

### **Response 190-3**

The Draft EIR provides a detailed discussion of unavoidable adverse impacts before and after the imposition of mitigation measures in Subsections 4.0 and 5.0 of Section IV.B., Air Quality, of the Draft EIR. Specifically, the Draft EIR concludes that after implementation of all feasible mitigation measures, Project construction, inclusive of the Equivalency Program and the proposed off-site improvements, would generate CO, NO<sub>x</sub>, and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities. Therefore, regional emissions from both on- and off-site (e.g., delivery trucks) construction sources would have a temporary but significant and unavoidable adverse impact on regional air quality. During the Project's operational phase, the Project, inclusive of the Equivalency Program, would result in emission levels that exceed SCAQMD significance thresholds for CO, NO<sub>x</sub>, PM<sub>10</sub>, and ROC. Mitigation measures would reduce the potential air quality impacts of the Project, inclusive of the Equivalency Program, to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, Project operations, inclusive of the Equivalency Program, would have a significant and unavoidable adverse impact on regional air quality. Accordingly, a statement of overriding considerations would be required for Project approval.

### **Comment 190-4**

The Report also glosses over the amount of water pollution that the project will produce and that will detrimentally affect the Santa Monica Bay as well as the Bellflower Aquitard, Ballona Aquifer, and the Silverado Aquifer which lie beneath the project site. The state of California has already given an "impaired" rating to the Bay, Ballona Creek Estuary, and Ballona Wetlands.

### **Response 190-4**

A comprehensive analysis of the potential impact of the Proposed Project on waterbodies that directly or indirectly receive runoff from the Proposed Project site, such as Santa Monica Bay and the aquitard/aquifers, is found in Section IV.C.(2), Water Quality, of the Draft EIR. Section IV.I, Safety/Risk of Upset, of the Draft EIR also addresses the potential impacts of the Proposed

Project on public health and safety as it relates to existing soil and groundwater contamination at, and adjacent to, the Proposed Project site.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 190-5**

#### **TRAFFIC**

The most immediate visible impact of the project, should it go forward, will be to traffic congestion. The Report acknowledges what residents of the area already know, that many of the intersections are at present near gridlock. Lincoln Blvd. is a prime example of a street that is already over capacity for much of the day. Even streets that have better ratings, such as Abbot Kinney Blvd., are chocked with commuter traffic. An honest appraisal of the traffic impact of Playa Vista II will show that the project would have a devastating impact on westside streets and freeways. Such an independent study should be conducted without delay, in order to allow a realistic evaluation of this project.

### **Response 190-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A comprehensive analysis of the Proposed Project's traffic impacts is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. Please See Topical Response TR-1, Playa Vista Transportation Model, on page 445, for a discussion of the transportation model and analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

### **Comment 190-6**

Playa Vista lies close to California's fragile coastline. Even without this project, the coast is besieged by irresponsible developers who neglect any thought of the impact of their developments on the precious environmental resources that are our legacy to future generations. It is important that the coast be protected from such irresponsible projects such as Playa Vista, not just for those who live nearby, but for all Californians. In the past, the coast has served as a relatively pollution-free area to which residents of the inner city could escape. Playa Vista, and similar if smaller developments, is changing that dynamic. The coast is becoming clogged with

traffic, mini-malls and cookie-cutter development projects who's [sic] sole purpose is making profits for their developers.

### **Response 190-6**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 190-7**

## **SUSTAINABLE DEVELOPMENT**

It is time that the state of California and local governments approve only sustainable developments and say no to irresponsible developments that destroy our future. We should also adopt a holistic approach to development that demands that regional solutions to problems such as traffic and pollution be addressed as part of the approval-or disapproval-process, in addition to more local concerns such as zoning. This is the essence of "planning," which the EIR attempts to downplay or ignore.

If reducing traffic and pollution along the coast are not part of the discussion about Playa Vista Phase II, there cannot be a claim that there really is a planning process. Instead, we are simply allowing random development. We should say as much.

In sum, the coastal area should be a mixture of human activity and nature. Public space should be at least as important as private development. Green space, in the form of large and small parks, wetlands, undeveloped bluffs and nature preserves should be given consideration in all development decisions. Playa Vista I, with its closely packed buildings, indicates that the developers do not understand this concept, regardless of their public relations campaign.

### **Response 190-7**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Playa Vista Project has been the subject of a long and complex planning process. The scale of the Project has been reduced substantially, with over 70 percent of the former Master Plan now preserved as open space.

A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the

analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

The Proposed Project has incorporated numerous sustainability concepts. For example, the Project provides a balance of residential, commercial, and retail uses that are all located within walking distance of at least one of a dozen parks. In addition, the freshwater marsh within the Playa Vista First Phase Project and riparian corridor was designed for natural storm water planning. The Proposed Project will incorporate the same features that were used in the Playa Vista First Phase Project that has been recognized as a model project for sustainable urban development. The overall Playa Vista project has also been recognized as one of five P.A.T.H. (Partnership for Advancing Technology in Housing, established by former President Clinton) communities in the United States and has also received the Ahwahnee Award from the California Local Government Commission's Center for Livable Communities.

#### **Comment 190-8**

#### HOUSING

At the same time, the coast should not be a playground just for the wealthy. Affordable housing and strong rent control should be a part of any environmental analysis. The level and percentage of affordability requirements at Playa Vista and other coastal developments should be in proportion to income levels in the metropolitan area. Anything less will continue the trend toward the coast becoming an enclave for the well-to-do. In this regard, Playa Vista Phase II is part of this problem. Real affordable housing, as well as cooperative housing ownership, should be considerations that are incorporated into Playa Vista Phase II and other development projects.

#### **Response 190-8**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. As a point of reference, the Project site is located approximately 2 miles inland from the coast, outside of the Coastal Development Permit area.

#### **Comment 190-9**

The first step to sustainable development along our coast should be a moratorium on all new construction that worsens the current traffic and pollution problems. Rail transit along major coastal corridors, such as Lincoln and Sepulveda Blvds., and to and from the coast from inland areas are the kinds of development projects we should be considering. When mass transit is in place that is capable of handling the majority of trips, increased density will be possible,

particularly along these transit corridors. Meanwhile, a moratorium would ensure that mass transit rail lines are built sooner, rather than later. In addition, bike and pedestrian-only zones in some of our coastal cities, including Venice, are the kind of “zoning” possibilities we should be considering.

### **Response 190-9**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 190-10**

#### THE SOCIAL COSTS OF PLAYA VISTA II

The only aspect of the Playa Vista project that is private is the massive profit that will be reaped by the developers. Meanwhile, the social costs of the project will be left to the taxpayers, beginning with millions of dollars in roadway “improvements” required to accommodate Playa Vista traffic.

Other social costs include public health expenses due to increased incidents of emphysema, other heart and lung diseases and cancer engendered by increased pollution, as well as mental health problems worsened by road rage and frustration with overcrowded streets. Pedestrian and bicyclist casualties are sure to increase because of increased auto usage. And in the long run, the public will be saddled with massive repair of ecological damage caused by constructing this project in the delicate Ballona Gap.

While the developers of Playa Vista may claim that their property rights allow them to go forward with this project, they are wrong. In crowded urban areas, individual property rights must be used in socially productive ways, and with the agreement of the community. To advocate unrestricted, or barely restricted, property rights is like advocating the free speech right to yell “fire” in a crowded theater. We all live in crowded [*sic*] theaters, called the Los Angeles basin and the California coast. The Playa Vista Phase II project will cause irreparable harm to our crowded theaters, and must be denied if we are to have a sustainable legacy to hand down to our children and grandchildren.

### **Response 190-10**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 191**

Mary Smith  
mary.smith.lfny@statefarm.com

**Comment 191-1**

I am writing to voice my concern regarding Phase II of the Playa Vista development. I have lived in Los Angeles for 32 years and have worked hard to purchase a home [i]n a safe neighborhood within driving distance to my work. As the city of Los Angeles seems to be growing at a phenomenal rate I have noticed that a drive to Brentwood which use [sic] to take me 10 minutes now takes 30 minutes from Westchester. I have noticed that since the opening of Phase I in Playa Vista has been opened and people [h]ave begun to move in that traffic from Jefferson Blvd on has become chaotic. I can only imagine when there are several thousand more people all converging on the 405 freeway in another year or so that my commute will easily take an hour.

I'm not sure what the city was thinking when they approved the development but it was grossly incompetent to approve the building of Playa Vista. Anyone that knows the area, knows that all of the south bay converges onto either the 405 or Lincoln not to mention every city south Culver City. If you have ever tried to drive down Lincoln anytime after 3:00 in the afternoon from Santa Monica, you would know that it will take you over an hour to get to the Marina. These are the only two options for people that live in either Westchester or the South Bay. I feel sorry for those that have no other option but to sit in gridlock on the 405.

I don't know how much more clear I can be but between LAX and this new development you guys have succeeded to create complete gridlock on the only freeway available going North & South. There is not enough money that the city could have gotten to approve this plan that would justify disturbing and destroying peoples lives.

There are people like several of my neighbors that work full time and have children. There [sic] children are in day care and have to be picked up by a certain time in order to be able to continue to take their children to a facility they feel confident in. Many of them have told me that the traffic has become so much worse that they are not able to make it in time and are charged by their daycare for being late. You may say well just leave a little earlier and you will be fine. I do not know many employers in corporate America that will just let their employee leave an extra 20 minutes early because traffic is bad.

I am pleading with you that you please STOP Phase II before it can not be corrected. We do not need an entire city within an already congested city. There has to be an alternative. There are endless cons to this development and only a handful of pros. The most serious cons would be health conditions, traffic congestion, & Noise. I do not know of one pro that would out way the con.

PLEASE STOP PHASE II !!!!! The people of this city should have a voice and have spoken. They do not want this to go through!!!!

**Response 191-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798. The analysis includes the identification of mitigation measures to reduce potential Project impacts. The mitigation measures would help to mitigate some impacts from regional growth as well as impacts from the Proposed Project. The Draft EIR also provides detailed analyses of air pollution impacts in Section IV.B, Air Quality on page 270, and noise impact in Section IV.E, Noise on page 553.



**LETTER NO. 192**

Richard Stall, Jr.  
10507 West Pico Boulevard, #200  
Los Angeles, CA 90064

**Comment 192-1**

Transit improvements in the first phase of Playa Vista are already reaping positive dividends for the local community. Jefferson Boulevard is greatly improved, and the Culver Loop and Widening project has made driving in the area far safer and more convenient. Improvements on Lincoln Boulevard between LMU and Jefferson are set to start soon, making that thoroughfare safer and less congested.

The Village will continue the improvements Playa Vista is making to the region's transportation system. Public transit will be greatly improved through extended service to employment centers in West Los Angeles.

I think the most important improvement in The Village plan is the completion of Bluff Creek. This new street will be a new arterial that will take traffic generated within Playa Vista and connect it to the 405 to the east and Lincoln to the west. There is no doubt that this improvement will also be enjoyed by commuters from as far south as the South Bay and as far north as Venice. Bluff Creek will run parallel to Jefferson, and will add capacity to accommodate growth.

I also believe that the improvement to the loop ramp at Lincoln and Culver will make it easier to transition to the Marina Freeway.

All of these improvements are made possible by Playa Vista, and make up for decades of deferred maintenance on our local streets and roadways. These improvements are meaningful, part of a regional solution and were conceived based on detailed analyses.

**Response 192-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 193**

Richard Standke  
22108 Gresham Street  
West Hills, CA 91304

**Comment 193-1**

The Village is an innovative development plan, especially as it relates to water quality issues. The Village will include rooftop drains that will filter the water and clean it before entering storm drains. Also, most of the parking in The Village is underground, enabling runoff from cars to be captured and cleaned unlike what we experience in surface parking lots all over the city.

On top of those improvements, Playa Vista is planning to finish the riparian corridor. This important corridor is part of a natural stormwater management program that filters water before it enters the wetlands and the Santa Monica Bay. The system is incomplete without The Village portion.

The Village has model programs for water quality. The rest of the city should read this section of the draft EIR and apply the programs that Playa Vista is implementing throughout the city.

**Response 193-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 194**

Shelly Stelzer  
11912 Weir Street  
Culver City, CA 90230

**Comment 194-1**

I'm writing in regards to the traffic problems existing on Inglewood Blvd. between Braddock Dr. and Jefferson. In my opinion and those of my neighbors, there is a very dangerous situation existing due to the fact that there is an absence of stop signs on that stretch of roadway. The cars speed down Inglewood non stop and behave as if it's a freeway!! We would like to have stop signs installed as you did on Mesmer, to help slow down the cars, as well as create intermittent breaks in the traffic flow. The proposed stop light at Inglewood and Allin will not alleviate the current or future "speedway" conditions.

Your attention to this matter is greatly appreciated. I can be reached at the above address or at (310) 391-4175 if you have any questions.

**Response 194-1**

The comment points out traffic safety and operational issues associated with existing traffic conditions on Inglewood Blvd. between Braddock Drive and Jefferson Blvd. The issues are not related to the Proposed Project or Project impacts. The requested improvements are not needed to address the impacts of Project traffic. These comments and suggestions will be forwarded to the Los Angeles Department of Transportation for review.

**LETTER NO. 195**

Richard and Pat Sterner  
118 Fowling Street  
Playa del Rey, CA 90293

**Comment 195-1**

We are residents of Playa Del Rey, a family with two small children. We have watched the Playa Vista project closely over the past few years. We are glad to see the attempt to make the project has [sic] minimal impacts on the surrounding environment and communities.

We hope to see this continuing attempt so that our community can maintain a high quality of life.

At this time, we would like to suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site into a park. We think that the park will be something that everyone in the neighborhood can enjoy. It will keep the area maintain the residential environment. Also, families with children would have more places to spend quality time together.

We would like to thank you for your consideration of this matter.

**Response 195-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 196**

Russell Stone  
7713 Emerson Ave  
Westchester, CA 90045

**Comment 196-1**

The Fresh Water Marsh has been a great success in providing habitat for birds. Phase II can be another boon to birds if done right. Based on my extensive birding along the bluff, I have found that the Playa Vista area has tremendous potential for attracting migrating songbirds. All that is needed is good habitat. If the riparian area, the bluff side, and the bluff canyons are landscaped properly, they can attract large numbers of birds.

**Response 196-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 196-2**

With the arrival of West Nile virus in southern California, I am concerned about its effect here. Construction site drainage ditches are prime breeding grounds for the kind of mosquitos [sic] that can carry the virus. The developers will need to find a way to prevent West Nile virus without poisoning the birds in the Fresh Water Marsh.

**Response 196-2**

The Ballona Freshwater Wetland System Operating, Maintenance and Monitoring Manual (contained in Appendix F-2 of the Draft EIR) requires monitoring for presence of mosquitos in the Freshwater Marsh and the Riparian Corridor. Recent monitoring of the Freshwater Marsh demonstrates that mosquito fish are effective at controlling any mosquito-related problems.

**Comment 196-3**

Playa Vista will bring a tremendous traffic increase to our streets. Because of the bluffs and the airport, north-south traffic through Westchester is confined to Sepulveda Blvd, Lincoln Blvd, and the 405 Freeway. These streets are already clogged. Cars traveling north on Sepulveda turning left on Centinela in morning rush hour already have to wait five minutes to make the turn. I'm afraid it will be ten minutes after Playa Vista is complete.

**Response 196-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

**Comment 196-4**

Unlike the above, there is another bottleneck area that has a simple solution. Overland Avenue, between Playa St and Culver Blvd is a major thoroughfare, yet it has two intersections with 4-way stops. In Friday night rush hour, traffic is backed up from Sawtelle to Culver. The obvious solution is for traffic signals to be installed here.

**Response 196-4**

The comment points out traffic operational issues associated with existing traffic conditions on Overland Avenue between Playa Street and Culver Boulevard, within the City of Culver City. The issues are not related to the Proposed Project or Project impacts. The requested improvements are not needed to address the impacts of Project traffic. These comments and suggestions will be forwarded to the City of Culver City for review.

**LETTER NO. 197**

Isabel Storey  
Isastor@aol.com

**Comment 197-1**

I would like to express my strong opposition to the Playa Vista Project, phase 2. I have been opposed to this development from the beginning, as it removes one of the last remaining wetlands on the West Coast and one of the last open spaces in the area near where my family lives.

As an approximately 20-year resident of Sunset Park, I urge you to come out strongly against further development of this site. The increased traffic will affect us directly, every day. And I believe the additional development is detrimental to our quality of life. What use is more development, no matter how well done, when it removes one of the last natural places left anywhere near us?

Both my children have taken school field trips to the wetlands and learned a great deal about the natural world. They have enjoyed seeing the many kinds of birds that use this as a stopping point on their migrations. There are so few wetlands left. Where will these birds stop if more of the wetlands are removed? I have seen studies that say that if the wetland area becomes too small at this site, it will not be large enough for the birds to stop. This affects not just the wildlife itself--but also the people, adults and children--whose quality of life is enhanced by their presence.

Keep in mind that once these lands are lost, they are most likely lost forever.

**Response 197-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Section III.A, Overview of Environmental Setting, of the Draft EIR, beginning on page 182, the Proposed Project site is not vacant, unused open space. In contrast, the Project site is currently used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, and since the 1940's has been part of an industrial complex which housed the Hughes Aircraft operations. Because of historic and existing disturbances, only small stands of native plants remain on-site, and even these have a high proportion of non-native species. Due to the presence of a high percentage of non-native species and long history of disturbance, habitat within the site is highly fragmented and of marginal quality. No threatened or endangered species occur within the site. Tours of wetland areas west of Lincoln Boulevard, approximately 1.1 miles west of the Proposed Project site, would not be

affected by the Proposed Project. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, and a detailed analysis of biological resources in Section IV.D, Biotic Resources on page 523. See also Sections II.15 and II.7, respectively, of the Final EIR, for corrections and additions to these sections.



**LETTER NO. 198**

Glenn Stronks  
7815 Yorktown Place  
Los Angeles, CA 90045

**Comment 198-1**

Now that Playa Vista is well along with its first phase, it's dear to me that you need The Village to complete the Playa Vista community. As a local resident, I think it is important to provide the residents of Playa Vista a place to shop for groceries and get their dry cleaning taken care of.

It will also help traffic in the area if Playa Vista residents can do that type of shopping within the community without having to drive to Westchester, Playa dal Rey or the marina.

The Village is a common-sense proposal that completes the idea of what Playa Vista is all about. It deserves to move ahead.

**Response 198-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 199**

Nancy Swaim  
1846 Walgrove Avenue  
Los Angeles, CA 90066

**Comment 199-1**

I am a longtime Mar Vista resident, homeowner and community activist.

My group, WAAG (Walgrove Avenue Action Group) works for the betterment of our community. Our mission is to work for the control of speed, reduction of overweight/oversize vehicles and reinstatement of Walgrove as a safe street on which to live and travel.

We are practical in our approach. While we do not deny that the tremendous influx of vehicles on our street has increased exponentially with Westside development, the main problem, and the main cause of accidents, is speed and overweight/oversize vehicles.

A few years ago, my group approached Playa Vista for help and we got it. Through their efforts, we have gained direct approach access to City agencies. Playa Vista offered and completed a costly speed study of Walgrove Avenue, the results of which contributed to DOT creating a punchlist for improvements, some of which the City has implemented, the others which have every possibility of being realized.

The Playa Vista Phase II DEIR is currently on the boards and has received much criticism from individuals and groups, some of which are overseen by outside interests.

I make my home and have my business in Mar Vista and Marina del Rey. I am a member of a neighborhood group that has received recognition and support from Playa Vista, whereas, it is rare for a developer to offer to mitigate their environmental impact. I believe the P.V. DEIR is basically sound in its approach. There remain questions of detailed plans to be answered, such as exactly what traffic mitigation Playa Vista will implement, and where. WAAG will reserve judgment on the overall plan until such time as that information is provided.

A version of Phase II must be realized as an integral part of the overall concept of a planned community.

I encourage the City to look beyond the biases of those who are opposed to the project because they refuse to acknowledge the reality of life on the Westside. The crucial housing shortage will inevitably result in development, period.

Managing that growth requires working closely with developers and interfacing the developers with the community, something the City should have done more of long ago.

Playa Vista has made good on the initiative to do that on its own.

By doing so, they have earned a place in the community.

**Response 199-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts, including analysis of traffic on Walgrove Avenue, has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts.

**LETTER NO. 200**

Greg Sweel  
1920 Sixth Street, #343  
Santa Monica, CA 90405

**Comment 200-1**

I am writing [*sic*] to comment on the Phase II EIR for Playa Vista.

I am opposed to increased traffic this development will create. Increased traffic must be mitigated or the project should not be allowed to continue.

**Response 200-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

**Comment 200-2**

I am opposed to increased air pollution this development will create. Increased air pollution must be mitigated or the project should not be allowed to continue.

**Response 200-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Subsection 5.0 of Section IV.B., Air Quality of the Draft EIR, all feasible air quality mitigation measures have been identified. This Draft EIR section concludes that even after the implementation of all feasible mitigation measures, both construction and operational regional emissions would exceed SCAQMD regional significance thresholds, resulting in a significant unavoidable impact which would require a finding of overriding consideration by the Lead Agency. However, please note that an in depth analysis of potential localized construction and operational impacts related to the Project was provided in Subsection 3.4.1.2 and Subsection 3.4.2.3 of Section IV.B. Air Quality of the Draft EIR. As concluded in these subsections of the Draft EIR, no localized significant impacts (e.g., exceedance of any health based standards) would occur as a result of the Proposed Project.

**Comment 200-3**

The EIR must address the indoor air inhalation exposure route due to chlorinated solvents in groundwater and soil beneath this project. The Johnson-Ettinger Model must be used to evaluate this risk and must use California specific input parameters required by the Department of Toxic Substances Control.

**Response 200-3**

As addressed in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, starting on page 666, existing contamination in the Proposed Project site that represents a risk to human health will be addressed through the use of health-based remediation goals (HBRGs). HBRGs for the First Phase Project were calculated taking into account vapor intrusion (indoor air inhalation) of chlorinated solvents and other volatile chemicals by using models developed by USEPA (2003) and modified to include California-specific input parameters. The Johnson-Ettinger model, with California specific input parameters, was one of the protocols followed to evaluate the risk of volatile chemicals in indoor air and to develop HBRGs for the First Phase Project. In accordance with Cleanup and Abatement Order No. 98-125, HBRGs will be developed for the Proposed Project site and will, at a minimum, be the same as the HBRGs for the First Phase Project site. The Johnson-Ettinger model, with California-specific input parameters, will also be followed to evaluate the risk of volatile chemicals in indoor air in the development of HBRGs for the Proposed Project site.

**Comment 200-4**

The EIR must address the explosive hazards presented by underground methane and the health risks posed by hydrogen sulfide in the subsurface.

**Response 200-4**

The Draft EIR provides a detailed discussion of soil gas issues in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, starting on page 700. Also see Topical Response TR-12, Soil Gas, on page 477.

**Comment 200-5**

The EIR must address the ecological impacts on the newly acquired State property wetlands. An ecological risk assessment [*sic*] must be performed to evaluate these potential risks.

**Response 200-5**

None of the land sold to the State of California was part of the Proposed Project or the First Phase Project. Moreover, the Draft EIR discloses the potential sale of Area A and portions of Area B to the State. The Draft EIR in Section I.D., Project Background, on page 7, acknowledges the agreement between the Applicant and the Trust for Public Land (TPL) for the State of California to acquire all of Area A and portions of Area B for long-term open space/recreation uses as well as the exclusion of Area C from the Playa Vista Planning Area. Consistent with the TPL Agreement, the State acquired this property in December 2003. At this time, the State has not determined the actual use of or proposed a specific project for these areas. The sale of Area A and a portion of Area B to the State does not alter the previously approved First Phase Project; therefore, the impacts of the First Phase Project as evaluated in the 1993 EIR and 1995 Mitigated Negative Declaration/Addendum remain unchanged. Further, the sale does not alter any component of the Proposed Project; therefore, the impacts discussed in this Draft EIR for the Proposed Project remain unchanged. The DEIR analyzes impacts of the Proposed Project, if any, on these areas as they currently exist. These areas are geographically separated from the Proposed Project by the First Phase Project as well as other urban development. As discussed in Subsection 3.3.3 of Section IV.D, Biotic Resources, of the Draft EIR on pages 543-545, the Proposed Project is expected to have a less than significant impact on downstream wetland habitats in Area B.

CEQA does not require preparation of either a Supplemental or a Subsequent EIR unless changes in a Proposed Project or the affected environment might alter impacts discussed in the Final EIR certified for the Proposed Project. In this case, a Final EIR has not been certified for the Proposed Project, and no changes in the Proposed Project or the affected environment have occurred. Accordingly, neither a supplemental EIR for the Proposed Project nor a subsequent EIR for the First Phase Project are required.

**LETTER NO. 201**

Marcy Szarama  
Project Manager  
PinnacleOne Los Angeles

**Comment 201-1**

I got an email from “Stop Playa Vista” now. They keep emailing me. I just want to let you know, I don’t agree with them. I support the project.

**Response 201-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 202**

Wei Shoong Teh  
5359 South Centinela Avenue  
Mar Vista, CA 90066

**Comment 202-1**

This concern stems from the recent change to a 6 lane roadway along South Centinela Avenue section from Jefferson to the 90 freeway for the Playa Vista Village Development.

Since conversion to 6 lane roadway, as a resident of this section, the noise level has increase [sic] significantly due to (1) vehicles such as noisy busses using the newly created rightmost lane closest to the residential houses and (2) increase [sic] traffic as more drivers discover the increase [sic] lanes.

Just as significantly, residents have lost the ability to park our cars in front of our houses during peak hours as new signs were erected recently after the conversion to 3 lanes either way.

This letter is a request to find out what Playa Vista and the City is considering to minimize the above issues and regain support for the proposed Village such as

- (1) Installing and maintaining sound absorbing shrubs beside the curb. (Less effective sound control but aesthetically pleasing)
- (2) Installing and maintaining sound walls. (More effective sound control, can be made aesthetically pleasing)
- (3) Helping residents locate alternate parking areas or suggest alternate parking solutions.
- (4) Re-drafting the fence and height limits for taller resident fences and walls facing Centinela Ave.

I look forward to a favorable reply and any additional steps residents will need to take, any meetings we need to attend to address the above issues.

**Response 202-1**

The comment raises traffic, parking and noise issues associated with existing traffic conditions on Centinela Avenue between the Marina Freeway (SR-90) and Jefferson Boulevard, and suggests these issues result from implementation of a mitigation measure associated with the previously approved First Phase Project.



The impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, and implementation of the mitigation measures required within the EIRs discussed above, as well as all other known projects expected to be completed in the study area.

A condition of approval was included for the previously approved Playa Vista First Phase Project, which requires funding of a Parking Replacement Trust Fund to address the loss of parking spaces resulting from First Phase Project traffic mitigations along Centinela Avenue, Inglewood Avenue, and Jefferson Boulevard, and is not part of the Proposed Project. As noted in subsection 4.0, Section IV.K.(2), Parking, on page 951 of the Draft EIR, the Proposed Project would not have significant impacts on parking.

As shown in Table 77, in subsection 3.4.2.1.2, Section IV.E, Noise, on page 577 of the Draft EIR, the Proposed Project would not result in any significant traffic impacts related to increased roadway traffic noise along Centinela Avenue or any other roadway. In addition, implementation of the Project's off-site improvements would also result in less than significant noise impacts along Centinela Avenue (See Subsection 3.4.4 of Section IV.E, of Volume 1 of the Draft EIR). No mitigation is required.

**LETTER NO. 203**

Arnold Tena  
7728 Hindry Avenue  
Los Angeles, CA 90045

**Comment 203-1**

I have been a resident of Westchester for over thirty-five (35) years and I have not seen more of a desecration of our area than I have in the past five years. I can understand that more and more people are moving into this area and that these people need a place to live. I don't believe this project meets the needs of the people that want to come into our area, as the building that I see going up is strictly for up-scale clientele. Where is the affordable housing that is so much needed?

**Response 203-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Section IV.J, Population, Housing and Employment, of the Draft EIR, the Proposed Project is anticipated to provide a range of housing types and sizes at corresponding cost levels. The Proposed Project does not result in the removal of any affordable housing units, or the relocation of any households residing in affordable housing units. As such, development of the Proposed Project would have a less than significant impact on affordable housing.

**Comment 203-2**

I am also very concerned about the added congestion all of this building will bring in to the area. Lincoln Boulevard is already over used,

**Response 203-2**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

### **Comment 203-3**

contrary to the studies that I have seen the developers put forth. I am also concerned about the impact all this is having on the ecological make-up of [sic] the area. The time will come when we will look down from LMU and see nothing but roofs of housing units with no open space.

### **Response 203-3**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 203-4**

Lastly, I have read, this day, as a matter of fact, that there is a really serious drought in the high Sierras and that there is much concern throughout the west, that water will be in short supply. This expected to affect all of us here. Where is all the water coming to satisfy all the people purportedly coming into the Play [sic] Vista area? Have all of these matters really been given thorough thought by the developers and the city powers that be? I think not.

### **Response 203-4**

LADWP is the “public water system” for the Proposed Project, as defined in Water Code section 10912(c). As required by SB 610 (now codified in the Water Code), LADWP prepared and certified a Water Supply Assessment (WSA) for the Proposed Project. According to the WSA, the Proposed Project is estimated to use 746 acre-feet of water annually. The WSA further states that the projected increase falls within the available and projected water supplies for normal, single-dry, and multiple-dry years through the year 2020 and within the 20-year water demand growth projected in LADWP's 2000 UWMP. As required, the WSA is included in the Draft EIR (Appendix N-1b).

**LETTER NO. 204**

Boise E. Thomas  
119 Fowling Street  
Playa del Rey, CA 90293

**Comment 204-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

We are optimistic this new, smaller version will have fewer impacts on the surrounding communities so we all can maintain our quality of life. I am very glad to see that the housing plans incorporate parks and open space sites.

I would like to take this opportunity to request Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 204-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 205**

Mona and Kenneth Tilden  
5625 Crescent Park West  
Playa Vista, CA 90094

**Comment 205-1**

Please don't take away our chance to have new stores and restaurants and, best of all, a local market at Playa Vista.

The Village will provide all of these things to our neighborhood, and we desperately want these things so that we can walk to the market or grab a cup of coffee without getting into our cars.

I think of the wonderful city neighborhoods in other parts of the country where people walk to work, walk to get their morning newspaper and pass each other on the sidewalks instead of on the freeway. Playa Vista has the chance to be one of those neighborhoods. Please support The Village and make our neighborhood the best it can be.

**Response 205-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 206**

Jack Topal  
8200 Calabar Avenue  
Playa del Rey, CA 90293

**Comment 206-1**

Water quality in Santa Monica Bay is very important to me. After major storms, we hear reports that the sewers are spewing contaminated water into the Bay, and reporters often warn viewers not to swim in the water in fear that they might contract waterborne illnesses.

I personally go sailing in the Santa Monica Bay every Friday and I have seen sheets of sewage and debris floating on the water, which is very disturbing. I am sure that this has an adverse effect on the fish and seals.

I understand that storm water from the property that is now owned by Playa Capital has gone untreated for years and flows directly into the wetlands and Ballona Creek. I am also a member of Friends of Ballona wetlands and am concerned about protecting these valuable wetlands. I also understand that Playa Capital constructed a freshwater marsh that is part of a natural storm water management system that helps to remove contaminants before they enter the Bay.

With The Village, this natural storm water management system will be completed with the development of the riparian corridor. After decades of mismanagement of water runoff, we finally see the light at the end of the tunnel. Playa Vista is not just building a responsible storm water management project. It is a model for others to follow.

Playa Vista should be commended for this precedent setting program, and the City should find it necessary to grant the approvals that will enable this system to be completed.

**Response 206-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 207**

Lawrence and Margaret Toy  
3701 Inglewood Boulevard  
Los Angeles, CA 90066-3211

**Comment 207-1**

Please be aware that the traffic on the intersection of Inglewood Blvd and Venice Blvd. is backed up in front of my house for at least two signal cycles at peak AM and PM traffic time. I live north of Venice Blvd. on Inglewood Blvd. and can't get out of my driveway at PM peak traffic time. With the new Fire Station on the south east corner, this would create a lot of problems for them. The idling motors in front of my house is not helping the air quality.

**Response 207-1**

The comment points out traffic operational issues associated with existing traffic conditions at the intersection of Inglewood Boulevard and Venice Boulevard. The comment also raises traffic operational issues with the placement of a new Fire Station on the southeast corner of that intersection. These issues are not related to the Proposed Project or Project impacts. These comments are noted and will be incorporated into the Final EIR for review and consideration of decision makers.

Air Quality impacts attributable to idling vehicles are addressed in the Draft EIR via analyses of carbon monoxide (CO) levels. An in depth analysis at selected intersections to determine the potential for the presence or the creation of CO hot spots attributable to the Proposed Project was provided in Subsection 3.4.2.3 of Section IV.B, Air Quality, of the Draft EIR. Intersection with the greatest potential for impacts were selected based on their Level of Service (LOS), the Project's traffic contribution to the intersection, the proximity of Project traffic to sensitive receptors, and intersection traffic volumes. This analysis evaluated conditions at intersections along Inglewood Boulevard as well as a number of other locations in the areas surrounding the Project site. As shown in Tables 17 through 20 of Section IV.B, Air Quality, of the Draft EIR, no significant impacts would occur at the intersection with the highest traffic volumes and worst level of service. Since significant impacts would not occur at the intersections with the highest traffic volumes that are located adjacent to sensitive receptors, no significant impacts are anticipated to occur at any other locations in the study area (e.g., Inglewood Boulevard and Venice Boulevard) as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersections. Consequently, the sensitive receptors that are included in this analysis would not be significantly affected by CO emissions generated by the net increase in traffic which would occur under the Proposed Project. As the proposed Project does not cause or localize air quality impacts related to mobile sources, emissions would therefore be less than significant for the Proposed Project.

**LETTER NO. 208**

Joseph Treves  
jntreves@earthlink.net

**Comment 208-1**

As a realtor living and working in the Mar Vista community I have gotten to know many of the residents in my neighborhood. We are all very concerned by the over crowding and traffic the Playa Vista project is causing to our community and we are distressed as to how this will impact our community and our property values. This development isn't even complete and traffic is already distressingly thick and difficult to navigate.

**Response 208-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798.

**Comment 208-2**

Traffic mitigations are dubious at best and non-existent for many of the “spill over” residential streets. Even now, before we feel the full effects of Phase 1, people are avoiding existing gridlock by driving through residential areas. This will get much worse, if we support additional construction in our Ballona Wetlands.

**Response 208-2**

With mitigation, the Proposed Project would not result in any significant traffic impacts. A new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. In order to protect neighborhood streets, an analysis was done to address neighborhood and cut-through traffic. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458.

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510),



certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.

It should be noted that the Proposed Project does not propose any construction in the Ballona Wetlands.

### **Comment 208-3**

58% of the places where Phase 2 traffic will cause a significant impact, Playa Vista has said it can remove the impact by increasing bus seats. Considering the socio-economic level of people paying \$800,000 and above for these homes, we don't think so!

### **Response 208-3**

The proposed transit enhancement mitigation measures are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of other transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the proposed mitigation would be effective to reduce potentially significant impacts to less than significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections. Please refer to Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, for a more detailed discussion.

### **Comment 208-4**

For 38% of the significant impacts, Playa Vista is only required to (contribute to the design and implementation of...). There is no time certain requirement for this mitigation. It could be years from now or never.

### **Response 208-4**

At locations where the mitigation program calls for the Proposed Project to contribute to the design and implementation of the measure, the contribution is expected to ensure that these improvements will be implemented. All of the proposed signal system improvements are currently scheduled to be implemented.

**Comment 208-5**

Playa Vista and Councilwoman Ruth Galanter promised Phase 1 would be finished before any request for approval of Phase 2. What's the rush?

Let's not proceed without first finishing phase one as promised, continue the necessary environmental impact studies to find how best to mitigate the traffic consequences of this development, and not unduly damage our precious Westside community.

**Response 208-5**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. There is no requirement that consideration of the Proposed Project be delayed until completion of the Playa Vista First Phase Project.

**LETTER NO. 209**

Roberta Trousdale  
321 Fowling Street  
Playa Del Rey, CA 90293

**Comment 209-1**

I am opposed to the approval of Phase 2 for Playa Vista. At the time Phase 2 was to be approved, the vacant land at Pacific and Vista Del Mar was supposed to be developed, for the benefit of the neighbors. I have not seen any plans for this, and it continues to be an eyesore in our neighborhood.

The amount of dirt and debris left by Playa Vista has made our neighborhood a construction site for many years, and they have not improved the area as they indicated they would. The traffic impact is just starting to be felt and will continue to erode our quality of life as the residents move in and traffic comes to a standstill with the present development.

Along with the Catellus development, this has made our lives intolerable with our neighborhoods being destroyed and the heavy equipment dislodging Indian burial grounds.

Please do not allow the Phase 2 to go forward.

**Response 209-1**

It is not clear what vacant land is being referred to. The site appears to be outside of the area of the Proposed Project. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, and a detailed analysis of archaeological resources in Section IV.P.(2), Archaeological Resources on page 1199. See also Sections II.15 and II.29, respectively, of the Final EIR for corrections and additions to these sections. The “Catellus development” is not part of the Proposed Project, rather, it is a separate project, which is considered in the Draft EIR as a related project (Related Project No. 24), and considered in the evaluation of cumulative impacts.

**LETTER NO. 210**

John & Shirley Tweten  
11947 Juniette Street  
Culver City, CA 90230

**Comment 210-1**

1. We are totally shocked, disappointed, frustrated & concerned; with the notification that Alla Road is not planned to proceed North over Ballona Creek! It is very obvious to us; this will result in serious traffic bottlenecks & potentially contribute negatively to public safety!
2. We are also shocked, disappointed, frustrated & concerned with the notification that the planned traffic improvement at the Lincoln Boulevard/Culver Boulevard location will not proceed as we were told and expected. But, instead, will result in very serious traffic bottlenecks & potentially contribute negatively to the public safety!

The alternatives remaining for the Playa Vista traffic engineers are extremely limited as a result of these rulings by the California Coastal Commission.

**Response 210-1**

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR. The extension of Alla Road north over Ballona Creek is not required for implementation of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR.

The comment regarding the planned traffic improvement at the Lincoln Boulevard/Culver Boulevard intersection appears to Refer to a CalTrans improvement known as "Lincoln North," which was denied by the California Coastal Commission in January 2003. As with the Alla Road extension discussed above, the Lincoln North improvement is not required for implementation of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR.

These comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 210-2**

The extremely NARROW twin Bridges existing at [Lincoln Boulevard/Culver Boulevard] will not provide sufficient room for our expected BIKE PATH WE HAVE BEEN promised, and looking forward to. [*sic*]

Instead six (6) lanes of motorized vehicle traffic will result! And our sorely needed bike path NORTH, APPRENTLY [*sic*] VANISHES?

PLEASE EXPLAIN THE LOGIC OF ELIMINATING THE EXPECTED BIKE PATH FROM PLAYA VISTA.

Numerous Playa Vista UPDATES have touted noticeably EXTENSIVE BIKE PATHS within. But, how do bicyclists exit the Playa Vista area, without resorting to hauling their bike by AUTO?

The final approval failure for these essential elements of traffic improvements & public safety, by the California Coastal Commission is unconscionable!

### **Response 210-2**

This comment refers to bikeways that are located beyond the boundaries of the Proposed Project. The additional bikeways are not required for implementing of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR. The comment regarding the decisions of the California Coastal Commission is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 210-3**

3. At the Inglewood Boulevard/Jefferson Boulevard intersection, Southbound traffic on Inglewood Boulevard is limited to two (2) lanes. A Right Hand turning pocket is sorely needed for westbound motorists, due to the extended wait for traffic light changes.

### **Response 210-3**

The comment requests that a westbound right turn pocket be added to the intersection of Jefferson Boulevard/Inglewood Boulevard to accommodate existing traffic levels. The Project impacts at this location are mitigated through the implementation of the transit system improvements. Therefore, the requested right turn pocket is not required to mitigate Project impacts. The request will be forwarded to the Los Angeles Department of Transportation for review.

**LETTER NO. 211**

John Jay Ulloth  
Director-at-Large  
Southern California Transit Advocates  
3010 Wilshire Boulevard, #362  
Los Angeles, CA 90010  
818-380-1252

**Comment 211-1**

I am writing in opposition to allowing the “developers” of La Ballona build any more phases of Playa Vista. Even if building is not stopped, certain minimum standards-some in the law, some common sense, must be met first before allowing any of Phase 2 or anything else to be built. Of all the places in L.A. county to take natural land and permanently convert it for exclusive human use, you could scarcely pick a worse place to allow development:

**Response 211-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 211-2**

1.) Building should not take place in any wetland or wetland-adjacent land presently containing surviving natural values. Studied together, with a baseline extending back 100 years, the losses of wetlands, adjacent uplands (once totaling 3,000 acres) & vernal pools due to development of Venice-of-America. Marina del Ray [sic], Playa del Rey, the 90 freeway have not been mitigated. Even though 600 acres may now be in state hands, Ballona’s usefulness as natural, open, floodplain, and wildlife refuge have been greatly reduced. The needs of fish, wildlife, and migrating wildlife that need large contiguous areas with wide buffers has not-and can not-be met by thin strips of land or any further development at Playa Vista! The placement of Playa Vista’s 1st phase that has been allowed was deliberately placed to maximize the damage to these natural values (right in the middle-to divide & conquer), and have not been replaced anywhere-particularly in the toxic runoff sump on the southwest side of Lincoln and Jefferson, formerly willow grove habitat. Pursuing the highest and best use at La Ballona means no more development there.

**Response 211-2**

Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR, on page 548, concludes that “no on-site wetlands beyond those previously permitted for fill would be impacted by the

Project.” The remaining wetlands in the Project Site, which have been permitted to be filled pursuant to previously approved Federal, State, and local permits, are less than 0.7 acre.

As contemplated by the First Phase Playa Vista EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized to support First Phase Construction activities. All activities have been conducted in compliance with local, state and federal permits. The biological baseline for the Proposed Project is addressed in Topical Response TR-11, Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area, on page 474.

The remaining comment is noted and will be incorporated into the Final EIR for review and consideration of the decision-makers.

### **Comment 211-3**

2.) Your past preference shown to the “rights” of developers to make money and steal subsidies from taxpayers has been granted at the expense of unacceptable life-safety risks (like brain damage in children) posed on residents: Massive quantities of toxic natural gas the Gas company stores under the site, joined by deep and unpredictable belchings of migrating gasses that have not been extracted (such as H<sub>2</sub>S) make any residential or commercial use of these lands unconscionable. Underground gas storage facilities in California near development have been closed because of health risks, but in Playa Vista’s case, the facility is on top of them! Faults in multiple directions with 100-foot displacements cross under Playa Vista, former wetlands over a fan of alluvial soil make Ballona a prime candidate for liquefaction. The large number of capped gas and oil well heads puncturing Playa Vista’s underlying sediments, that access was supposed to be preserved to, (but were recklessly bulldozed by the developers), provide many channels for both sources of gas to escape-particularly during an earthquake or tsunami when escape routes for Phase 1 residents (and incoming rescue equipment) are most likely to be blocked. Gas leaking through water was demonstrated during construction of Phase 1 with no apparent comprehension on your part. A number of us believe increased coverage of the site, and untested liners beneath new buildings are likely to trap gas, then fail, and cannot be replaced without complete demolition... and residential buildings in existing Playa Vista Phase 1 will ultimately be abandoned & demolished (hopefully before a class action wrongful death suit from these toxics bankrupt the city).

### **Response 211-3**

As discussed in Subsection 2.2.1.1.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 672, the Southern California Gas Company owns the reservoir used for natural gas storage, which is situated approximately 1.25 miles west of the Proposed Project site, on the north and south sides of the Ballona Channel at a depth of more than 1 mile (approximately 6,200 feet) below the surface. The Proposed Project is not “on top” of this facility.

The issue of “communication” between the Del Rey Storage Facility and the Playa Vista project site has been investigated extensively. It was concluded that the methane at Playa Vista is not migrating from the Storage Facility. In his April 17, 2000, report, the City’s Department of Building and Safety peer reviewer, Dr. Victor Jones III of Exploration Technologies, Inc., stated that “[t]he soil gas and monitor well data from site 509 indicates there is no gas migration at this location from the adjacent Playa del Rey storage field.” See Dr. Victor Jones’ April 17, 2000, report. Furthermore, in 1993 and 1994, Dr. Isaac Kaplan analyzed gas samples from the Del Rey Storage Facility and gas samples from the Ballona Channel and Centinela Creek. In the study, Dr. Kaplan concluded that the gas located in the Ballona Channel and Centinela Creek was not emanating from the storage facility. See January 20, 1994, report by Dr. Isaac Kaplan, entitled “Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina Del Rey, California.” (This item is located in the reference library for the Final EIR.)

To further evidence that the gas detected at Playa Vista is not migrating from the reservoir, Playa Vista, The Gas Company, the Department and Dr. Victor Jones compared analyses on various components of gas from injection wells and observation wells at the Del Rey Storage Facility and the aquifer and soil gas samples from Playa Vista and concluded “with a high degree of confidence, that there is no evidence for migration of the Southern California Gas Company stored gases into the Ballona Aquifer or into the surface soil at Playa Vista Development site.” See “Report on Comparison of Gas Analyses from Southern California Gas Company Injection Wells with Soil Gas and Groundwater Gas from 50 ft. Gravel Aquifer” dated January 29, 2001 (this item is located in the reference library for the Final EIR). In January 2001, the Department of Building and Safety concurred that the methane gas observed at Playa Vista does not come from the Del Rey Storage Facility. See January 31, 2001, letter from the Department to Playa Capital.

Further, this issue was evaluated from 2000 to 2001 by the CLA, in consultation with the City’s Bureau of Engineering, the City’s Department of Building and Safety, Dr. Jones, Kleinfelder, Inc., the CLA’s peer reviewer, and the Division of Oil, Gas and Geothermal Resources. Kleinfelder concluded: “Methane detected in soil gas samples is not associated with the nearby natural gas reservoir.” See February 7, 2001, report by Kleinfelder, entitled “Methane Sampling Data Assessment Playa Vista Development Los Angeles, California,” p. 3. The CLA Report, Technical Appendix J-6 to the Draft EIR found: “the Southern California Gas Company Playa Del Rey Gas Storage facility is not the source of methane contamination found at the site. Furthermore, there is no evidence that suggests that the gas storage facility is leaking or improperly maintained. There is no evidence that the gas storage facility presents a danger to workers or future residents.”

There are no oil or gas wells within the Proposed Project site.

Soil gas issues are addressed in Subsections 2.2, 3.3, 3.4 and 4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR. This issue is also addressed in Topical Response TR-12, Soil Gas, on page 477.



Impacts from seismic hazards, including liquefaction, are addressed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 254. As discussed in Subsection 3.4.1.3, seismic hazards include groundshaking and rupture, tsunami/seiche, liquefaction, lurching, and slope stability. No evidence of surface or shallow subsurface faulting has been found at the Playa Vista site; therefore, the potential for surface rupture is considered extremely low. There have been no historic tsunamis generated from local offshore earthquakes. The maximum expected run up from a tsunami wave in the Project site is 7.9 feet above mean sea level in a 100-year interval, which is approximately 0.9 foot higher to 16.1 feet lower than the existing elevations throughout the Project site. There are no waterbodies near the Project site that would cause a seiches hazard. There exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. As part of the issuance of building permits by the City's Department of Building and Safety for individual structures, site-specific geotechnical investigations are required. Given that the City's Department of Building and Safety requires site-specific investigations (including liquefaction risk assessment) prior to construction, and the application of engineered fill soils in building pads would address the potential for liquefaction directly under structures, impacts to the Proposed Project from on-site liquefaction are considered less than significant. No evidence of potential lurching hazards was found at the Project site. If lurching were to occur, it would only occur at the surface at the Bluffs; therefore, no substantial damage to structures is anticipated. Slope stability would only be an issue at the Bluffs, and these areas will not be developed with structures. All these seismic related hazards were found to be less than significant.

#### **Comment 211-4**

3) There has never been an effective transit plans to eliminate the car traffic Playa Vista generates. The best cure for this is not to ever build in greenfields like La Ballona, not to build near L.A.X. where air & water quality is worst, not to build where traffic congestion is already the worst on the westside, not to build where air traffic may increase and the airport may be reshaped to expand to attract even more ground traffic! But if development must take place here, as we discussed in Sierra Club Angeles Chapter Transportation Committee, no development of this magnitude should ever be permitted without high-capacity mass transit service going through the middle of it - as a precondition. Long before the State's current fiscal meltdown, transit agencies-even the giant L.A. County M.T.A., have been scrambling for funding; 100% Playa Vista's lines need to be completely paid for (construction, equipment, plus a transit trust, whose dividends would fund operations) by the developer-before any construction starts. What Playa Vista offers is an internal fixed route circulator that goes nowhere but in circles-a time-tested "solution" that never works, (scripted by those who would never be caught dead riding it themselves) that takes huge subsidies to run.

On Southern California Transit Advocates' latest study tour, we rode similar lifeline bus service in Riverside county whose route map between trailer parks and a transit center at a large mall looked like a plate of spaghetti, that picked up exactly one passenger (the driver greeted by name). Had there not been 11 of us on the study tour, farebox recovery for this run (the weekday after thanksgiving-busiest shopping day of the Christmas season) would have been a disaster... The waste of labor to open this kind of circulator is intolerable when S.C.A.G. tells us only 4% of

trips in all of L.A. County are taken on any form of transit! Circulators' main weaknesses are: they force unnecessary waits and transfers to the outside world (a rule of thumb is a 50% loss of potential passengers with each transfer!), they do not reflect the travel realities of southern Californians (long distance, cross-county trips), they do not coordinate their headways or span of service with largo agencies, munis, or other circulators they connect to, and additional fare is often required.

#### **Response 211-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, to obtain additional details on the elements of the transit improvement program that Playa Vista is proposing and the potential market that exists and will exist after the Playa Vista site is developed.

#### **Comment 211-5**

Minimally, the developer should be required to bear the full cost of extending M.T.A., Santa Monica Municipal, and Culver City bus lines inside and through its development as a precondition of approval.

#### **Response 211-5**

The Proposed Project would provide six buses plus operating and maintenance costs over a 10-year period, and expanded intelligent shuttle system, transit priority systems and associated signal system improvements to ensure a high degree of success in the utility of this alternative mode of transportation. All the elements of this transit improvement plan have been coordinated working closely with the City of Culver City, Culver City Bus, and the City of Los Angeles Department of Transportation.

#### **Comment 211-6**

Ideally, the developers should be required to pay for construction and a rail trust fund to operate rail lines through their development. 2 rail lines originally crossed La Ballona—S.P. along Alla, and the Pacific Electric at Culver Boulevard should be pwt [sic] back—probably somewhere near their original locations—Alla to reach Venice (and downtown Santa Monica), and Culver to downtown Culver City, L.A., and south bay beaches. Some of us on Friends of Green Line want a direct line between L.A.X. and Lincoln in Santa Monica. Mixed-use Transit Oriented Development should be located around a Playa Vista station/transit center for built-in ridership.

**Response 211-6**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A comprehensive transit mitigation plan has been developed working closely with the Cities of Los Angeles and Culver City and the Culver City Bus. Please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, to obtain additional information on the transit improvement elements and their effectiveness.

The Lincoln Corridor Task Force recently completed its First Phase of a long term improvement study of Lincoln Boulevard corridor between LAX and Santa Monica. The Light Rail Transit alternative, among several other alternatives has been evaluated in this study. With implementation of the mitigation program discussed in the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR on page 216, the Proposed Project would not have any significant traffic impacts. Nevertheless, as discussed on page 7 of Appendix K-1 of the Draft EIR, in the event the Lincoln Corridor Task Force adopts a set of regionally superior traffic improvements that are equivalent or superior in mitigating the project-related traffic impacts of the Proposed Project, prior to implementation of the Proposed Project or its mitigation measures the City may require the Proposed Project to contribute towards the implementation of the Task Force's improvements in an amount not greater than the Project improvements being superseded.

**Comment 211-7**

4) Some high percentage of occupancy of Playa Vista Phase 1 should be required before any work is permitted on Phase 2! Because Phase 1 is nowhere near full, we have little idea of the actual traffic gridlock and pollution that awaits us when they are. Without hundreds of millions in state, county, and local government subsidies, none of Playa Vista would ever have been built. But Playa Vista is filling very slowly. It is time to prove whether Playa Vista can stand on its own as a worthwhile use of resources and investment of our tax dollars, and prove its value without one more dollar of subsidy.

**Response 211-7**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The First Phase Playa Vista Project is included in the Draft EIR as Related Project No. 40 for purposes of cumulative impact analysis. A complete description of the traffic impact analysis methodology, including identification of the baseline, is contained in Subsection 3.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

**LETTER NO. 212**

J. Michael Uszler, M.D.  
5732 Kiyot Way  
Playa Vista, CA 90094  
(310)745-4779

**Comment 212-1**

As a resident of Playa Vista I speak for approving The Village at Playa Vista! Shops, restaurants, dry cleaning, and yes, coffee shops are a big part of what makes a group of homes and parks a real community.

Their being closely available to us will minimize a lot of extra driving around that we are presently doing. I know because I have lived in Playa Vista for a year, and I have to drive off the premises for every service! Think about the shops and restaurants close to your home and how important those are to you.

All of us at Playa Vista need The Village.

I request its approval. If you have any questions regarding this matter, please call me.

**Response 212-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 213**

Marshall E. Uzzle

**Comment 213-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 213-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 214**

Dan and Nancy Valenzuela  
746 Milwood Avenue  
Venice, CA 90291

**Comment 214-1**

I write today to express my support for The Village at Playa Vista.

For years, we have heard about the jobs/housing imbalance on the Westside. There are three jobs here for every home, so people commute from all over Los Angeles County and beyond to get to their jobs in Santa Monica, Westchester and El Segundo.

When I first learned about the Playa Vista project, I was disappointed that it was to include large office buildings and a hotel that would create more jobs without providing enough housing. I am very happy to hear that the latest proposal (The Village at Playa Vista) includes very little office or commercial and focuses on our desperate need for more housing.

It seems counterintuitive to reduce traffic by constructing more places for people to live, but it is true. If quality and affordable housing is available near where the jobs are, workers will chose to live there and shorten their commutes, thereby taking people off the freeways.

Playa Vista won't solve all of the jobs/housing issues we face, but if the city encourages this and more residential development on the Westside, we will continue to address what many believe is our biggest challenge in Los Angeles.

**Response 214-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 215**

Tim Vargas  
7845 Flight Avenue  
Los Angeles, CA. 90045

**Comment 215-1**

I do not want to lose the beautiful view from the bluffs! We used to watch the fireworks from up there, and I would stop up there when I was riding my bike.

I have also noticed the great rock formations of the cliffs. The native [A]mericans deserve more respect than that! [A]nd what about the animals they were there first! I am against anymore building in that natural area. [P.S.] And [t]he traffic goes without saying!... your friend tim vargas

No More Buildings!

See following page for photo.

The ballona wetlands: Keep it alive!

**Response 215-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148, a detailed analysis of archaeological resources in Section IV.P.(2), Archaeological Resources on page 1199, a detailed analysis of biological resources in Section IV.D, Biotic Resources on page 523, and a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798. See also Sections II.27, II.29, II.7, and II.15, respectively, of the Final EIR, for corrections and additions to these sections.





**LETTER NO. 216**

Martha Villalobos  
13163 Fountain Park, #B-231  
Playa Vista, CA 90094

**Comment 216-1**

I am writing in support of Playa Vista's plans for The Village.

Having lived in the Fountain Park Apartments at Playa Vista for over a year, my husband and I are excited about the prospects of moving into a new home in The Village.

The homes in the first phase were snapped up so quickly that we have very little chance of purchasing a home at Playa Vista unless The Village is built. Like many other people who are familiar with Playa Vista, we were attracted by its Westside location, proximity to a variety of parks and other amenities and, of course, the fact that all the homes are brand new.

If demand for the homes at Playa Vista is any indication, The Village will be wildly successful. Please approve The Village so that we can become homeowners in a neighborhood we already enjoy!

**Response 216-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 217**

Leila Visram  
13163 Fountain Park Drive, #B115  
Playa Vista, CA 90094

**Comment 217-1**

As a current resident of Playa Vista living in the Fountain Park Apartments, I strongly encourage the City of Los Angeles to approve the Environmental Impact Report for The Village at Playa Vista.

Since the EIR was released, Playa Vista and the State of California came to agreement on the sale of land west of Lincoln and north of the Ballona Channel for preservation as open space. The Village will complete the “smaller and greener” development that its executives promised when the NOP was released last year.

The Village also reflects a strong commitment by the developer to creating a development with numerous community benefits. The current Playa Vista residents need the shopping outlets, grocery store, coffee houses and restaurants so that we won’t need to drive outside the community to complete daily errands and trips. We could walk or take the shuttle in to the Village to shop or have dinner. The Village will also bring more new parks that can be enjoyed by people throughout the area.

**Response 217-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 218**

Seema Visram  
7301 West Manchester Avenue, #115  
Los Angeles, CA 90045

**Comment 218-1**

I live in Westchester, and I strongly encourage the City of Los Angeles to approve the Environmental Impact Report for The Village at Playa Vista. The Village is necessary to complete the Riparian Habitat Corridor portion of the Freshwater Wetland System and restore the Westchester Bluffs on the southern part of the property. In total, approximately 23 acres will be dedicated to habitat protection and open space within the development. All of this will provide critically needed open space for the community.

The Village will also be a welcome addition to our community by providing the shopping outlets, grocery store, coffee houses and restaurants for Playa Vista's residents and the surrounding community. The town center will provide valuable services within close proximity to the people who need them, so that Playa Vista residents, visitors and employees won't need to drive outside the community to complete daily errands and trips.

**Response 218-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 219**

Jeanette Vosburg  
4124 East Boulevard  
Los Angeles, CA 90066

**Comment 219-1**

Please register my opposition to Phase II of the Playa Vista Development. I expressed my opposition to Phase I. After reviewing the Report prepared by Exploration Technologies, Inc (Victor Jones) for the City of Los Angeles Department of Building and Safety updated August 10, 2001 all of my worst fears as a nearby resident were confirmed.

I believe that the City withheld from the Chief Legislative Analyst Report facts so damaging it was at a minimum, a dereliction of duty and possibly a criminal act on the part the Chief Legislative Analyst, the Planning Department, the City Council and the Mayor. I believe if there is an explosion or exposure to toxic oil field gas at Playa Vista, the City of Los Angeles will end up having to tens of millions of dollars in lawsuit settlements to the injured parties.

Playa Capital has publicly claimed that there is no liability to the taxpayers of Los Angeles. If this is their legal position, then the City should as part of this new approval process demand that Playa Capital formally indemnify the City from any future claims associated with explosion or exposure to toxic oil field gas at Playa Vista.

**Response 219-1**

A detailed discussion regarding methane is provided in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 700. This issue is also addressed in Topical Response TR-12, Soil Gas, on page 477.

As discussed in Subsection 2.2.4.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 710-713, between June 2000 and March 2001, the CLA conducted an independent and public review of issues of potential concern at Playa Vista. As part of the Chief Legislative Analyst (CLA) review process, the City's Department of Building and Safety retained an independent peer reviewer, Dr. Victor T. Jones III of Exploration Technology, Inc. ("ETI"). In addition, the CLA retained Kleinfelder, Inc. as the CLA's consultant, and consulted with the City's Bureau of Engineering, Geotechnical Division, the City's Department of Building and Safety, the City Attorney's office, the State's Department of Conservation, Division of Oil, Gas and Geothermal Resources ("DOGGR"), the California Department of Conservation Division of Geology and Mines, and the Regional Water Quality Control Board, all of whom independently reviewed technical issues regarding the Playa Vista site. As part of that review process, the Applicant also retained its own consultants, including Dr. Kul Bhusan, Mr. Nabih Youssef, Dr. Isaac Kaplan, Dr. Kerry Sieh, Dr. Thomas Davis, Dr. James Embree, and Mr. John Sepich,

regarding the issues addressed during the CLA's review process. The CLA Report (Appendix J-6 of the Draft EIR) concluded that methane at Playa Vista appears to be related primarily to a deep thermogenic source and is not associated with the Del Rey Hills gas storage field.

This comment will be noted and incorporated into the Final EIR for review and consideration of decision-makers.

### **Comment 219-2**

As another aspect of this development, I would like to point out that traffic mitigations are dubious at best and non-existent for many of the "spill over" residential streets. Even now, before we feel the full effects of Phase 1, people are avoiding existing gridlock by driving through residential areas. This will get much worse if we support additional construction at Playa Vista.

### **Response 219-2**

With mitigation, the Proposed Project would not result in any significant traffic impacts. A new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. In order to protect neighborhood streets, an analysis was done to address neighborhood and cut-through traffic. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458.

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.

### **Comment 219-3**

It makes no sense to approve Phase II when the impacts of Phase I are only beginning to be felt. Why rush to approve Phase II before completion of Phase I?

**Response 219-3**

The Draft EIR provides a comprehensive analysis and discussion of the Proposed Project's environmental impacts. The First Phase Playa Vista Project is included in the Draft EIR as Related Project No. 40 for purposes of cumulative impact analysis. A complete description of the traffic impact analysis methodology is contained in Subsection 3.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 828. Please see Topical Response TR-1, Playa Vista Transportation Model, on page 445 for a discussion of the traffic model methodology.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**Comment 219-4**

## ATTACHMENT

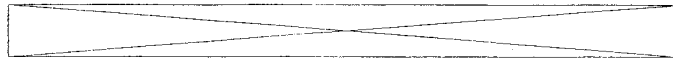
Executive Summary, Report Prepared By Exploration Technologies, Inc. See following pages.

[Regional Geochemical Assessment of Methane, BTEX, CO<sub>2</sub> and H<sub>2</sub>S Gas Occurrences  
Playa Vista Development  
First and Second Phases  
Los Angeles, California

Prepared for: City of Los Angeles Department of Building and Safety  
July 10, 2001]

**Response 219-4**

The attachment provides a July 10, 2001 report, entitled Regional Geochemical Assessment of Methane, BTEX, CO<sub>2</sub> and H<sub>2</sub>S Gas Occurrences, prepared by Exploration Technologies, Inc., and supports comments in the preceding sections of this letter. As such, this comment is addressed in Response 219-1.



**Last Updated 08/10/2001**

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**REGIONAL GEOCHEMICAL ASSESSMENT OF  
METHANE, BTEX, CO2 and H2S GAS OCCURRENCES**

**PLAYA VISTA DEVELOPMENT  
First and Second Phases  
Los Angeles, California**

**Prepared for:**

**CITY OF LOS ANGELES  
DEPARTMENT OF BUILDING AND SAFETY**

**July 10, 2001**

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### EXECUTIVE SUMMARY

Near surface soil gas surveys conducted at Playa Vista have revealed anomalous concentrations of hydrocarbon gases, at a depth of 4 ft, within significant portions of Tracts 49104-01 and 49104-02. The largest magnitude anomalies (> 12,500 ppmv) make up a very small part, only 1.5%, of the 1087 acres in the Playa Vista project. Nearly two thousand samples of soil gas from these tracts have been collected and analyzed. Methane occurs in concentrations as high as 100%, and all of the larger magnitude seeps also contain associated ethane, propane, and butanes, definitive indicators of a thermogenic source.

Dramatic evidence of the magnitude of the gas flows has been evidenced by intense bubble activity in a large flooded area of Tract 01 following the heavy rains in January 2001. Bubbles were observed erupting from the water surface directly over the region where the soil gas survey contained the highest methane concentrations. At one location, the flow was intense enough to raise the surface of the water a few inches above its surroundings in the form of a low frothy fountain. An observation well (FW-09) installed at this location was found to have a natural flow rate of 9 liters/minute, and in spite of construction related changes, remained active until destroyed in late June of 2001.

The result of this investigation indicates that natural gas steadily migrates upward through the sediments to the surface at Playa Vista. This is the result of an advective pressure, upwards of 20 psig in the gravel aquifer, driving the methane gas to the surface. Another independent indication of the steady migration was obtained from investigations of bubbling seeps in the streams at the confluence of the Centinela and Ballona Creeks and in the riparian wetlands corridor that trends westerly along the base of the bluffs. Samples of gas bubbles collected more than seven years earlier from Centinela Creek were found to have essentially the same composition as that of the methane gases collected in these surveys. Thus, bubbling seeps in streams are present on both the north and south sides of the Playa Vista soil gas anomalies. The results from Centinela and Ballona Creeks confirm that this has been going on for many years and are an indication that effective paths of migration have been established in the subsurface.

An extensive program of drilling and testing of vent wells and monitor wells was carried out within the upper 50 feet of sedimentary cover underlying these gas-charged areas in an effort to characterize the nature and source of these thermogenic gases. One of the most important layers investigated is the Ballona Gravel Aquifer, located at a depth of about 50 ft. This gravel bed contains accumulations of the same thermogenic gases, under essentially the same area as defined by the soil gas survey. In an attempt to measure flow rates and deplete these shallow gas accumulations, over 120 vent wells were installed (mostly in Tract 01) on the largest soil gas anomaly. This effort was essentially a failure because of the weakness and fluidity of these former Los Angeles River sediments, which were too easily disturbed by the drilling operations and the flow of gas, water and sediments towards the well screens, plugging the well screens and preventing the

installation of effective vent wells, even when free gas was encountered. The gas pockets were also found to be too erratic to be predictable (for example, three vent wells were drilled within 10 ft of the actively venting macroseep at FW-09, with none of them able to produce gas). Other examples are cited in the text.

The origin of this natural gas is very likely from the Pico sands, that have been found to have gas shows in the interval from 500 ft to 3,000 ft in each of five exploratory wells drilled on Playa Vista property in the 1930's. One of these wells, the Universal City Syndicate Inc. LTD #1, had a blowout in 1930 while drilling at 1831 ft in the Pico Formation, and produced gas at an estimated rate of 5,000 MCF per day. This well was subsequently drilled to 5,960 ft and plugged as a dry hole in 1931. During re-abandonment operations, completed in June 2001, four gas samples were collected at depths ranging from 668 ft to 760 ft near the base of the fresh water zone. The composition of this gas was found to be very similar to that of the methane gas collected by the soil gas survey and from the monitor and vent wells. No significant gas shows were found below the base of the fresh water in this well during the final plugging and abandonment of this well, indicating that the Syndicate well is not the source of the gas.

It is significant that natural gas was discovered at depths of 1,500 ft to 4,700 ft, in the Pico and Repetto sands of the El Segundo field, which is on a similar structural trend only 4.5 miles southwest of Playa Vista. The analyses of two Pico gas samples from this field show that they are very similar to the thermogenic gases at Playa Vista. This field has produced about 23 billion cubic feet of gas, giving an indication of the possible magnitude of the gas accumulations that could, or may have existed beneath Playa Vista.

An independent assessment has been made of the geological and geophysical characteristics of the formations at Playa Vista in an effort to understand the nature of the structure and stratigraphy of the subsurface gas sources and the gas migration pathways. A high-resolution 2D seismic line, located along Jefferson Boulevard provides an image of the shallow subsurface down to a depth of about 2,000 ft. A 3D seismic survey was also carried out to image the deeper section, extending to about 8,000 ft.

A specific problem that required attention was the proposed existence of the Lincoln Boulevard Fault that was postulated to dip in a westerly direction down toward the gas storage reservoir (operated by Southern California Gas Company). A very careful review of the information from the 2D and 3D seismic surveys does not show any evidence that such a west-dipping fault exists. Corroborative evidence has also been obtained from an investigation of the composition of the gas in the storage reservoir, which proves that the Playa Vista gases are unrelated to the gases from the storage field. Thus it can be concluded that there is no postulated fault migration pathway for storage gases to migration from the storage reservoir located at a depth of about 6,200 ft and the Playa Vista site. Thus two independent methods provide collaborative evidence that the Lincoln Blvd. Fault, as postulated does not exist.

Unfortunately, the seismic data were not acquired in a manner and over a sufficient area to allow a definite conclusion to be drawn as to the exact nature of the subsurface

structures beneath Playa Vista. As a result, there are essentially two interpretations of the subsurface geologic structure and the nature of the paths of gas migration, as outlined in Assessment of Geological and Geophysical Characteristics of the Playa Vista Development Site and Integration with the Geochemical Observations by Anderson, Becker and Witherspoon, 2001. One involves a slump model in which 800 to 1,000 feet of strata have been disrupted during slumping of the valley wall that defines the southern boundary of the Ballona Creek floodplain. The surface along which slumping occurred cuts into the uppermost Pico sands. As a result of this truncation, the seal in the sand/shale sequences of this shallow section was breached, and a path for gas to migrate to the surface was provided. An alternative model involves interpreting the seismic data as reflecting a structure with a near-surface system of faulting/jointing that provides a mechanism for migration of gas from the middle and upper Pico sands. Drainage of gas from these sands would explain the very significant migration of gas at the surface of Playa Vista. Lineations observed in the surface gas anomalies may indicate fractures bounding major slump blocks that formed during gravity driven collapse of the valley wall into the deep valley. The main question to be answered is the depth, extent and origin of the fractures, however, neither model leads to a deep-seated "earthquake fault" that would cause structural damage.

Anomalous methane concentrations in the shallow sediments at Playa Vista, and the difficulties experienced in attempting to characterize the magnitude and nature of these gas accumulations present a significant and challenging problem. The presence of gas seeps requires building methane mitigation systems for any building constructed directly over the areas where anomalous concentrations of soil gas have been measured. In the interest of safety, no variances in these methane mitigation requirements should be allowed. Not only do these mitigation systems require extensive field-testing to determine their effectiveness in handling the gases venting naturally at Playa Vista before initial occupancy, in view of future seismic activity in the Los Angeles Basin, this effectiveness must be periodically reevaluated. The installation of real-time monitoring systems installed in the vent risers in the Playa Vista buildings could provide significant protection, provided that they are properly calibrated and demonstrated to be responding to the actual gas levels, which accumulate under the buildings foundations. This testing has not been done, and must be completed as part of the due diligence before occupancy.

Utility conduits, utility vaults and sewers contained within the streets and public right-of-ways are also subject to explosive gas concentrations. The building mitigation systems offer no protection, nor mitigation for this area of concern. The design of these features should be such that risk of explosion is minimized. ETI has never received any information from Playa Vista regarding the handling of methane problems associated with the utilities and suggest that this area be given due consideration.

## 1.0 INTRODUCTION

### 1.1 Location

The proposed Playa Vista Development (Site) encompasses about 1,087 acres approximately 15 miles west of downtown Los Angeles (McLaren Environmental

Engineering, May 8, 1987, ENSR, October 1997). The site is four miles south of the City of Santa Monica, 0.5 miles west of the City of Culver City, and approximately 1.5 miles north of Los Angeles International Airport. As shown by Figure 1, the Playa Vista Development is bounded by Marina del Rey on the north, Culver City on the east, Playa del Rey and Westchester Bluffs on the south, and Vista del Mar and Playa del Rey on the west. Playa Vista will be developed as an integrated, mixed-use, master-planned community composed of residential, commercial, recreational, and civic structures. Lincoln and Jefferson Boulevards are the major north-south and east-west traffic arteries, respectively, in the area.

The site has been subdivided into four planning areas, A, B, C, and D based upon the quadrants formed by the intersection of Ballona Channel and Lincoln Boulevard. These planning areas are shown in Figure 2. The proposed development of Playa Vista includes two major phases, as shown in Figure 2. Initially, only the western portion (Tracts 01, 02, 03, 05, and 06) of the Phase 1 area was surveyed. Lot and product numbers used to refer to specific building construction areas for these Phase 1 tracts are shown in Figure 3 for reference. The eastern portion of Phase 1 (Tract 04) was only recently surveyed along with the Phase 2 areas as part of this regional soil gas survey.

## 1.2 Previous Work

Exploration Technologies, Inc. (ETI) of Houston, Texas was originally retained in May 1999 by the Los Angeles Department of Building and Safety (LADBS) and Playa Capital to serve as "Peer Reviewer" regarding subsurface methane gas issues in the proposed Playa Vista Development in Los Angeles, California. The initial scope of work was to review and comment on previous studies/reports concerning methane at the Playa Vista Development (PVD). Following a review of the available data, and a meeting with the Playa Vista consulting experts on September 15, 1999, it was readily apparent that previous studies were not adequate, nor thorough enough to fully assess the occurrence of methane gas at the PVD due to limited sampling and analyses. Methane gas concentrations in groundwater from three zones had been measured in five monitor wells that had been installed in Tract 03 by Sepich and Associates (Sepich Associates Inc., April 2, 1999). The data from this assessment was included in the report by Integrated Environmental Services, Inc. (IES, May 28, 1999). These wells confirmed the presence of large methane concentrations in the 50-foot gravel aquifer. However, the results did not provide definitive methane content, nor adequate information about the source of methane in the aquifer.

Based on ETI recommendations, a preliminary subsurface methane assessment (ETI letter report, November 29, 1999) was conducted during October and November, 1999 over Tract 03 in the proposed Playa Vista Development. The location of this first soil gas data set collected by ETI is shown in blue on Plate 1 for reference to the other ETI soil gas data sets. Measurable concentrations of ethane, propane, and butanes were confirmed for the first time from Playa Vista soil gas and ground water samples following protocols set by ETI. Concentrations for all of these light gas components were noted to increase in

a southwest direction towards the University City Syndicate Inc. LTD #1 well, which at that time was considered as a possible source of thermogenic gas.

Geochemical results from the soil gas and monitor wells (dissolved gas in ground water, and free gas bubbles liberated from the ground water) indicated that the methane and other associated light hydrocarbon gases likely had a common, deep petrogenic source. Ethane, propane, iso-butane and normal-butane are never found associated with 100% biogenic methane gas (Coleman et al., 1977, Coleman, 1979, Coleman et al., 1981, 1988, Jones and Drozd, 1983, Jones et al., 2000, Jones and Agostino, 1998, Thompson, 1966). Thus, the presence of these four independent light gases indicated a definite thermogenic gas contribution, which clearly shifted toward the thermogenic end member to the southwest near the University City Syndicate Inc. LTD #1 well. Methane stable carbon isotopes analyses performed on free gas samples collected from each of the five monitor wells in Tract 03 also showed an increased thermogenic contribution of methane gas towards the southwest.

In contrast to earlier results reported by Playa Vista contractors, the light gas compositions of the free and dissolved gases obtained from the water wells were found to be nearly identical to those measured at four feet in the soil gas samples. Two previous soil gas data sets collected by CDM on September 21 and again on October 7, 1999 failed to report any ethane or propane, yet did report small quantities of butanes and pentanes (ETI letter report, November 29, 1999, CDM October 12, 1999 fax report). This compositional disagreement with the free gas in the 50-foot aquifer was the reason that ETI changed the soil gas protocol and collected an independent soil gas data set for evaluation of the 49104-03 area.

This initial ETI methane assessment conducted within Tract 03, involved sample collection of soil gas from the shallow subsurface and the collection of groundwater and free gas samples from a group of newly installed monitor wells screened in the 50-foot gravel aquifer. Following a review of this initial survey data, it was readily apparent that previous studies were inadequate for assessing the methane gas issue at the Playa Vista site due to limited and poorly done sampling and analyses.

Based on the results of this first survey within Tract 03, ETI designed and recommended a more regional assessment of the Phase 1 development area. This second, more thorough assessment was conducted between October 1999 to April 2000, and included the collection of 812 four-foot deep soil gas samples placed on a 100-foot grid spacing and 41 monitor wells, installed and sampled in the 50-foot deep Ballona gravel aquifer. Delays by Playa Vista and wet weather caused the monitor well portion of this second investigation to extend into early April of 2000. This second, more thorough assessment, directed and supervised by ETI, was successful in determining the nature, magnitude and distribution of methane gas in near surface soils, as well as in the 50-foot gravel aquifer located beneath the site in the Phase 1 area. This second ETI soil gas data set is highlighted in green on Plate 1.

ETI's second assessment report (Subsurface Geochemical Assessment of Methane Gas

Occurrences, Playa Vista Development, First Phase Project, Los Angeles, California) for the City of Los Angeles, Department of Building and Safety (LADBS) was issued on April 17, 2000, immediately following the collection and analysis of the monitor well data. Soil gas samples for both of these two surveys were collected by Scientific Geochemical Services in Casper, Wyoming and the analytical laboratory work was done by Microseeps Laboratory in Pittsburgh, Pennsylvania. Sampling and analytical protocols are given in the appendices to these first two reports. All stable carbon isotopes analyses were done by Isotech Laboratories in Champaign, Illinois.

Geochemical results from the April 17, 2000 assessment show two main areas of high methane concentrations (above 70% methane) in the west half of Tract 01 and the south half of Tract 02. Anomalous levels of ethane, propane, and butanes are also coincident with these main two methane seepage areas, indicating the methane is related to deeper thermogenic sources. Areas of anomalous methane concentrations dissolved in groundwater and methane from free gas in the groundwater from the 50-foot gravel aquifer are nearly coincident with the anomalous areas where ethane, propane and butanes was found in the soil gases. The coincidence of anomalous soil gas and ground water data further confirms that the methane is from a thermogenic source, which must lie beneath the gravel aquifer.

Evaluation of available Pico gas well data reported in the April 17, 2000 report, indicated that the source of the anomalous thermogenic methane was most likely from shallow natural gas within the Upper Pliocene Pico Formation. The presence of gas in these shallow natural gas sands was established from available driller's logs, and by the fact that the University City Syndicate Inc. LTD #1 well blew out and produced 5 million cubic feet of gas per day while drilling at approximately 1830 feet. In addition, the El Segundo field, which lies on the same geologic trend as Playa del Rey, produced over 23 billion cubic feet of dry gas from the Pico sands (Cordova, 1963; Wright, 1991). The chemical and isotopic composition of the El Segundo dry gases lie very close to those observed in the Playa Vista gravel monitor wells (Dennis Coleman, 2000, private communication). Coleman's isotope data from these El Segundo samples are listed in Table 5 for comparison with the soil gas and monitor well data.

The Playa del Rey Oil Field, and now Southern California Gas Storage Field lies immediately to the west of Lincoln Blvd. (Barton, 1931, Hodges, 1944 and Riegler, 1953). In order to determine whether or not this gas storage field had contributed as a source, ETI had suggested that additional studies needed to be conducted (ETI 1st and 2nd Progress Reports, 1999). The most important study required was to sample and analyze several of the gas storage wells from the field for comparison with the Playa Vista seepage anomalies, and the second most important study was to conduct a soil gas survey over the storage field. Nine of the gas storage and observation wells were sampled on September 5, 2000 by CDM (observed and assisted by ETI) and analyzed by Isotech Laboratory. A comparison of this chemical and isotopic data with the surface macroseeps and with the gas data from the Ballona gravel monitor wells has demonstrated that the gas storage wells are isotopically and chemically different, and cannot be the source of



the gases found in the surface macroseeps and in the Ballona gravel monitor wells.

### 1.3 Scope of Work

A regional soil gas survey was recommended in the first progress report issued on June 18, 1999, and was repeated in every subsequent report, including the April 17, 2000 report. This important objective was finally completed in January 2001. Including all of the data from the first two soil gas surveys completed in 1999-2000, a total of 1621 sites were used to construct a set of regional soil gas maps over the entire Phase 1 and Phase 2 areas of the planned 1087 acre Playa Vista Development. Soil gas samples for the regional data set were again collected at four-foot depths by Scientific Geochemical Services from Casper, Wyoming and analyzed by Microseeps Laboratory in Pittsburgh, Pennsylvania. Soil gas collection and laboratory analysis procedures are contained in Appendix A (see also ETI April, 17, 2000) for reference. Hydrogen sulfide (H<sub>2</sub>S) was again measured in the field on soil gas samples using a Jerome 631-X instrument, manufactured by Arizona Instruments. Laboratory analyses of the light hydrocarbons, permanent gases, BTEX and H<sub>2</sub>S are included in Tables 1, 2, 3 and 4 and individual component contour maps are shown in Plates 2 through 10. Concentrations of methane, ethane, propane, and butanes with detection limits of approximately 10 ppbv and BTEX at 70 ppbv are reported.

The additional regional soil gas sites collected by ETI are plotted in black on Plate 1, along with the soil gas data from the first two surveys. All soil gas sample sites for all three data sets were surveyed by Psomas & Associates. Although a 100-foot grid spacing was recommended by ETI, only the Phase 1 areas were sampled on this spacing, except in areas of recent surcharge or existing buildings. At the insistence of Playa Vista, the Phase 2 areas were sampled on a 300-foot grid spacing within Areas A, B, C, and D that had been sited for construction, and on a 500-foot grid spacing in the wetland portion of Area B. These variations in sample spacing are clearly shown on Plate 1. A high water table in the western part of the marshy area precluded sampling a large portion of this area. Additional detail on a 100-foot grid was later added between November 2000 and January 2001 around the sites in the Phase 2 areas where methane concentrations exceeded 1000 ppmv, and around some of the storage/observation wells of the Playa del Rey Gas Storage Field.

In addition to soil gases, free gas samples were collected from bubbling seeps located along Centinela Creek near the confluence with Ballona Channel and from the riparian wetlands corridor that lies just north of the south bluffs. These bubbling macroseeps are also plotted on Plate 1 with the soil gas data. Three individual seep samples, denoted as A, B and C, were collected from Centinela Creek by Walt Mersch (SGS) and Paul Witherspoon (LADBS Consultant) using an inverted funnel on October 20, 2000.

Another area of strong seepage where gas bubbles through water lies within the riparian wetlands corridor that runs east-west along Teal Street just north of the bluffs. A macroseep gas sample (denoted as seep 1, see Plate 1) was collected on March 16, 2001 just south of soil gas site 817 from this riparian wetlands corridor. Within the wetland

corridor several additional macroseeps were observed. This wetland area was not sampled during the earlier Phase 1 soil gas surveys because the area was off-limits for surface access. Additional survey data should be gathered throughout this wetland corridor in order to properly complete this regional assessment.

Data from these bubbling macroseeps was analyzed by Isotech Labs and has been compared with the previous isotope data collected and analyzed in 1993 by Global Geochemistry Labs. Seeps analyzed by Global Geochemistry were reported to have been collected near the confluence of the Centinela and Ballona channels, although no site location map exists for these samples collected by Global. Comparison of these two independent data sets shows that they are nearly identical in composition and suggests that the A, B, C seeps are probably the same seeps previously collected by Global.

Several additional bubbling seeps that have not been sampled were also noted along Centinela Creek during the October 20, 2000 reconnaissance. The locations of all of the seeps observed are shown on Plate 1. Because of accessibility, these other seeps were not sampled during this reconnaissance survey. Chemical and isotopic data should be collected from these additional seeps.

Advective gas flows were observed by means of visual observations made after flooding rains in the vicinity of most of the large magnitude soil gas anomalies. A series of shallow trenches and very shallow (5 to 10 foot deep) 24-inch diameter monitor wells were constructed in these areas for observation of the gas flux from these observation stations. More than 120 geoprobe Cone Penetrameter Tests (CPT boreholes) were installed in the vicinity of these active gas seeps by CDM working with LADBS consultant Dr. Gary Robbins in an attempt to vent the gas pockets contained within the upper 50 feet of sediments, and in particular near the top of the Ballona gravels. Summary data from these boreholes are listed in Table 7. The methodology developed for this testing is given in Appendix C.

In an attempt to improve the placement of these vent and monitor wells, additional infill soil gas samples were collected within the main seepage area located in area 49104-01. The data was collected using the exact same soil gas collection methods using ETI's four foot soil gas probe, however, in order to expedite turnaround and decision making the data was run in the field using a MTI field-portable gas chromatograph. This instrument has the ability to detect only methane, ethane and carbon dioxide, with detection limits of 10 ppmv for methane and ethane and 0.01% for CO<sub>2</sub>. This data was used only for defining the variation of gas seepage anomalies within the 01 area where the largest macroseeps exist. All data within the calibration range of this instrument (i.e. 10 PPMV to 100%) are essentially of the same quality as the laboratory data. However, below the detection limit of 10 PPMV the field-screening data is bottom truncated. A few of these samples were analyzed in a laboratory GC with lower-level detection limits to verify the quality of this data. None of the infill samples were field screened for H<sub>2</sub>S because no H<sub>2</sub>S was found to be associated with the deeper methane sources. H<sub>2</sub>S is clearly derived from surficial sources, and although it is a nuisance, it is not a deep source gas. A total of 303 infill soil gas samples were collected. This data is listed in Table 8 and site locations

are plotted in Plate 12. Contour maps for methane, ethane and carbon dioxide are plotted on Plates 13, 14 and 15.

## 2.0 RESULTS AND INTERPRETATIONS

### 2.1 Soil Gas Methane

The concentration of methane in soil gas (Table 1, Plate 2) is highly variable over the survey area. Values fall within the interval from background (<2 ppmv) to over 900,000 ppmv. The highest contour values shown on the methane map (Plate 2) are the upper explosive limit 150,000 ppmv (15%) and 25% of the lower explosive limit 12,500 ppmv (1.25%). These contour values distinguish areas where the concentration is above these two thresholds. These two thresholds are commonly used to define areas of greater concern, and were selected for this reason. However, it should be noted that these values are significantly below the highest values that lie between 25 to 98%. The lower values for contours on Plate 2 delineate the edges of the largest magnitude seeps. Such large contour cuts for methane emphasizes the large contrast with background areas, where no macroseeps even close to these thresholds have been found.

Large areas of seeps with anomalous methane concentrations (greater than 12,500 ppmv) are clustered in two main areas (Plate 2). One of these extends about 900 feet in the western part of Tract 49104-01. The second methane anomaly, which is more than 1000 feet long, is in the southern part of Tract 49104-02. The total area of anomalous methane concentrations (greater than 12,500 ppmv) covers only about 1.5% of the entire 1087 acre Playa Vista site. Smaller methane anomalies occur in the vicinity of, and north of these two large methane anomaly areas. Contoured anomalies appear to be controlled by some sort of subsurface geological influence that defines three principal directions, with azimuths of N 65 E, N 7 W, and N 62 W, suggesting some sort of subsurface geological control.

As shown by Plate 2, much lower methane concentrations were found in the Phase 2 (A, B and C) areas. Soil gas values within these three areas are more typical of normal soil gas concentrations, (Jones et al. 2000). Slightly lower threshold contour values on the second methane contour map (see Plate 2a) outline the much lower level soil gas anomalies observed within these three areas. On Plate 2a the areas of highest methane concentrations are truncated to only 10,000 ppmv (1%), which only slightly enlarges the most anomalous areas, again emphasizing the contrast between the background areas and these very large magnitudes associated with the areas containing the macroseeps. In order to show contrast within the background areas typical of areas A, B and C the contour values used were reduced to values ranging from 10 to only 2 ppmv. The lower contours used were 10, 8, 6, 4 and 2 ppmv. Both Plates 2 and 2a show the enormous contrast in magnitudes of normal soil gas concentrations measured in the background areas with those of the two main macroseep areas.

Soil gas concentrations within the 25% to 90% range at a depth of only four feet generally cannot be sustained without advective gas flow from depth. Methane is too

volatile to be sustained at these levels without a source. Advective gas flow has been confirmed within the vicinity of most of the large magnitude seeps by means of visual observations made after flooding rains, or in areas which are permanently water covered, or in water saturated areas that overlap the largest soil gas seeps.

Attention on the Product 700 area (see Figure 4) was initially focused by the observation of many bubbling macroseeps noted after heavy rains (Mike Reader personal communication, January, 2000). In order to evaluate this area of potential macroseeps under dry conditions, which prevailed when this work started, a series of shallow trenches (Figure 5) and very shallow (5 to 10 foot deep) 24-inch diameter monitor wells (Figure 6, 7) were constructed. Figure 4 shows the location of this construction area, along with the trench, flux and deep venting wells. The symbol T was used to denote a shallow trench and FW (flux well) was used to denote a 24-inch monitor well. Coarse gravel was placed within the 24-inch FW wells and a 24-inch PVC casing was used to cap these locations, which were installed in order to observe gas flux from some of the most anomalous soil gas areas. The trenches were dug only 36 inches deep using a backhoe and were then filled with water for gas bubble observations, since they did not penetrate the ground water table which was about 5 to 7 feet below surface in this area. The 24-inch FW wells did penetrate the ground water table adequately to allow observation for gas bubbles. Initial observations made before they were cased showed that the gases entered these flux wells more from the sides than from their bottoms, indicating that they did not intersect natural, vertical migration pathways, and would, in all likelihood stop venting when the shallow sands were depleted. They did, however, amply illustrate the tremendous gas charging of the shallow subsurface within the areas containing the larger methane concentrations.

Data from the analyses of gas samples collected by volume displacement on November 30, 2000 from the first two trench wells, T-1 and T-2 are listed in Table 5. As shown, methane ranges from 62.90% to 76.16%. These concentrations are in the same general range as the soil gases collected from four foot soil gas probes from this area. These trench samples were collected by volume displacement, with the venting gases displacing the water in the inverted bottles within seconds. Thus the bottles must contain 100% gas from the shallow sands, and could not have picked up any significant volume of air from the atmosphere during the sample collection. The presence of 23 to 36% air in these samples requires that the air had to be contained in the soil gas with the methane discharging from the shallow sands. The presence of air within such shallow gas filled sands would provide ideal conditions for oxidation of the hydrocarbon gases in-situ. The methane isotopes for these two samples are nearly identical at -59.30 and -59.28 parts per mil with respect to the PDB standard, and fit right in with the isotope values noted within the 50-foot Ballona gravel monitor wells. Thus, the methane contained in the gravel aquifer does not appear to have been further oxidized within this very shallow sand.

The ethane isotopes, on the other hand, are the heaviest values found on the site, out of over 80 individual analyses. The ethane from these two trenches have the very heaviest ethane isotope values found to date, of -17.94 to -13.62 parts per mil with respect to the PDB standard, suggesting very degraded (oxidized) ethane. In contrast, the ethane in the

50-foot deep Ballona gravel monitor wells is much lighter, although it is still fairly heavy when compared to typical reservoir values, which normally range from about -29 to -32 parts per mil. The monitor well gas has ethane isotopes ranging from about -18 to -21 parts per mil, and is also unusual. Such heavy ethane isotope values in the trench samples would suggest severe degradation, either very near the surface, or somewhere along the migration pathway taken by these gas seeps. Because of the large free gas discharge rates (liters per minute) from these two shallow trenches it would be impossible for the air to be a sampling artifact. This air must have naturally diffused into the shallow sediments where it mixed with the methane gas from depth, and was then discharged with the seepage gases when the surface cover was removed by digging and installing the trenches.

In October/November of 1999 very large magnitude soil gas anomalies were initially found at sites S77 and S78 within area 49104-03. The methane and ethane concentrations and stable carbon isotopes of these gases were as follows:

Site	Methane %	Ethane ppmv	Methane Delta C12/13 parts per mil	Ethane Delta C 12/13 parts per mil
S77	70.66	2400	-58.74	-20.57
S78	56.32	2900	-52.46	-19.92

**These concentrations and isotope values are fairly close to those observed in the gravel monitor well MMW77 that underlies these soil gas anomalies (see Plate 11 from the ETI April 17, 2000 report). The reported values in this well were:**

Site	Methane %	Ethane ppmv	Methane Delta C12/13 parts per mil	Ethane Delta C 12/13 parts per mil
MMW77	89.02	3400	-59.95	-20.49

**Both compositional and isotopically the larger soil gas sample (S77) is very similar to the dissolved gases in the gravel aquifer 50 feet below the surface. The CO2 soil gas values for these two samples are 5.56 and 16.65%, indicating an increased level of degradation for S78 over S77. This degradation appears in both the methane and ethane isotopes, but is clearly greater for S78.**

In August 2000 a second survey was conducted over this same area following the installation of the concrete pilings for construction of the foundation of the Fountain Park Apartments (Concentration Of C1-C4 Gaseous Hydrocarbons, BTEX Aromatic Hydrocarbons, Carbon Dioxide And Hydrogen Sulfide In Soil Gas At Tract-03 Beneath Fountain Park Apartments Following Installation Of Concrete Pilings, March 14, 2001). The anomaly defined by these two sites (S77 and S78) was used as a test control area, during the August 2000 survey because it is located outside of the apartments, and therefore outside of the influence of the concrete piles. On resurvey, the 75% magnitudes had changed, values that had been as high as 75% now ranged only to 25%. Two of the largest magnitude sites found within this anomaly on the second survey were 5011 and 5018. The measured concentrations for these sites on resurvey were:

Site	Methane	Ethane	Methane Delta C12/13	Ethane Delta C 12/13
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	%	ppmv	parts per mil	parts per mil
5011	25.33	1100	-51.63	-16.83
5018	10.16	400	-45.09	-14.37

**Because of somewhat drier conditions, this reduction in magnitude was suggested to be related to the reduction in moisture content increasing permeability of the near-surface vadose zone. In spite of this reduction in relative magnitude, the presence of advective flow at this location was later confirmed using the EPA flux chamber technology on March 16, 2001. Measured gas flux ranging as high as 9313 mg/cubic meter was reported (Sepich Associates, Soil Gas Investigation for 5457 S. Brisa St., March 29, 2001).**

As with the trench samples, it is apparent that the gases at depth in the gravel aquifer are being altered by oxidation effects that occur whenever these gases migrate to the near-surface. These examples demonstrate that both the methane and ethane isotopes can be altered by biological degradation. It is possible that changes in these isotopes, which are related to exposure to oxygen sources, might be useful for separating gases that migrate directly from the gravel aquifer from those that have an appreciable residence time in the very near-surface where the degradation changes mainly occur. This would require very discrete and controlled samples collection from various depths.

In January of 2001 a very large rain occurred which flooded the surface, allowing the visual observation of numerous additional macroseeps, which could be located from their bubble trains. Over 140 stakes were placed in the southern portion of the Product 700 pit in an attempt to mark all of the individual bubble trains before the staking crew ran out of stakes. The largest magnitude natural macroseep (Figure 8, 9 and 10) found by this method within the Product 700 pit was gauged to vent about 9 liters/minute of free gas. Observation well FW-09 was installed at this location by digging a 24-inch 10-foot deep hole, which was cased with 24-inch PVC pipe and used as an additional flux observation station. Two free gas samples were collected from this well on January 24, 2000 and sent to Isotech Labs for chemical and isotopic analysis (see Table 5). In sharp contrast to the two trench samples, these free gas samples were found to contain nearly 100% methane, 97.68% and 97.66%. The carbon dioxide levels are 0.72% and 0.67%, respectively, providing nearly 99% of the total gas when added to the methane. Ethane and propane are 0.34% and approximately 0.0046% (3400 and 46 ppmv). Ethane isotopes are -20.08 and -20.01 parts per mil with respect to the PDB standard. Comparison with the 50-foot Ballona gravel monitor wells shows that these gases are nearly identical to the gases contained within the aquifer at depth. Clearly these samples must represent direct vertical discharge from the Ballona gravel aquifer without any additional degradation related to residence within the upper 50 feet of sediments. This certainly suggests that the trench gas samples are likely degraded very near the surface.

Numerous geoprobe Cone Penetrameter Tests (CPT boreholes) were installed by CDM working with LADBS consultant Dr. Gary Robbins in an attempt to install vent wells in the 50-foot Ballona gravel aquifer. Figures 11, 12, 13, 14 and 15 illustrate the process which is described in detail in Appendix C. The first test performed was very successful. A CPT borehole was pushed to 66 feet below surface at TV-1 near soil gas site 207. When the probe rods were pulled up to 60 feet subsurface, the well discharged about one

gallon of water and then flowed free gas at the rate of 10 liter/minute for 69 hours, until destroyed in an unsuccessful attempt to replace the CPT probe rods with a monitor well. Most of these attempts to install gas vent wells failed because the shallow silts at the top of the 50-foot gravels were too unconsolidated to remain open. The wells were clogged by unconsolidated clastic sediment and were invaded by water, which shut off the gas flow. Many unsuccessful attempts were made by CDM to solve the mechanical production problems, with 10 monitor wells installed and 122 CPT borehole attempts. Gas production was too sporadic and unpredictable to be effective. Free gas is generally present somewhere in the upper 50 feet of sediments within the areas having the largest methane soil gases. However, this free gas is not easily found, nor vented from these unconsolidated sediments. Gas could not even be successfully vented from the vicinity of some of the largest macroseep areas. For example, three of these potential vent wells were drilled within 10 feet of FW-09, on three sides, none of which were capable of venting gas from the gravel aquifer.

A backhoe accident during February knocked over the casing of flux well FW-09 and filled the hole with gravel. An attempt was made to dig out the gravel, which resulted in reducing the gas flow to about 2 liters/minute (Figure 16). As of May 16, 2000 this FW-09 observation well has continued to flow gas, unabated by the attempts to vent the gases from the 50-foot Ballona gravel aquifer (see Figure 17). This observation well, and many other tests (over 120 attempts were made to install vent wells in the gravel aquifer) have yielded similar results. These tests suggest that the gas contained within the 50-foot Ballona gravel aquifer provides a vertical pathway for the gas, but is not an intermediate source for the macroseep vents, at least not for the largest soil gas anomalies. The gravel serves as a transmission zone, but unfortunately does not appear to provide a significant intermediate reservoir that serves as a source for the four-foot deep near-surface soil gases. These observations suggest that the main gas source must lie below the Ballona gravels.

Numerous surface flux tests (Figures 18, 19, 20 and 21) were also conducted using an EPA flux chamber over portions of the methane anomaly in Tract 49104-01 by CDM (assisted by Dr. C. E. Schmidt) during the first quarter of 2001 (March 6, 2001 CDM letter report to David Nelson entitled "Methane Surface Flux Emissions for Product 700 Area, Lots 58 and 59 in Tract 49104-01"). Methane gas flux rates as high as 23,000 CFG/D were conservatively estimated to be present over a 44,000 square foot area within the Product 700 area, where the very largest magnitude seeps have been found. These observations, together with the observed elevated methane soil gas concentrations shown by Plates 2 and 2a clearly classify the largest, and most anomalous methane contours as surface methane gas macroseeps.

## 2.2 Soil Gas Ethane, Propane, and Butanes

The presence of detectable concentrations of methane homologs (ethane, propane, iso-butane, and normal-butane) illustrated on Plates 3, 4, 5, and 6, respectively, have similar distributions as methane, proving that a major portion of the methane is from a thermogenic origin. Distinctive compositional ratios for ethane/propane and iso-

butane/normal-butane confirm that the four foot deep soil gases are directly related to deeper gases measured in the 50-foot Ballona gravel aquifer monitor wells. An iso/normal butane ratio greater than one generally indicates an immature source (such as the Pico sands), however this ratio has also been shown to increase during oxidation of these hydrocarbons (Coleman et al. 1981, James, 1983, 1984 and 1990). Additional deeper gas source information from the abandoned wells are required to determine the controls on these ratios.

As with methane, contour intervals were chosen in order to emphasize the larger macroseeps in Plates 3 to 6. Lower values were selected for ethane and propane so that the much lower concentrations within these background areas are defined. This is required to properly illustrate the gas concentrations typical of areas A, B and C. (Plates, 3a and 4a, are contoured in ppbv). Soil gas data measured at four feet provides a very cost-effective method for finding macroseeps over such a large regional area, however, soil gas cannot be used exclusively for evaluation. As shown (ETI April 17, 2000 report), the four foot soil gas data does aid significantly in defining appropriate locations for the deeper monitor wells, however, monitor wells are also essential for proper due diligence in order to evaluate the Ballona gravels for their gas content. If no significant gas is found in either the soil gas or the monitor wells, then the area can be declared as completely safe from charging by deeper gas sources. The requirement for monitor wells is particularly important in this case because of the wide regional soil gas spacing used to survey these three areas. With this spacing anomalies can be missed, and will at best be poorly defined. When monitor wells are used with soil gas, then these two independent data sets can provide a reasonably good compromise for properly defining subsurface gas anomalies, and even for suggesting their potential migration pathways.

Anomalies from these lower contour intervals shown on Plates 2a, 3a and 4a were used to pick locations for the 50-foot deep Ballona gravel monitor wells that are recommended for due diligence in completing this regional assessment. At a minimum, five monitor well locations have been selected for area A, B and C at soil gas sites 6002, 6041, 7058, 8008 and 8022. These five sites were selected because they have low grade soil gas anomalies in methane, ethane and propane. A very important distinction is to note that the methane, ethane, and propane magnitudes, and the methane/ethane and ethane/propane ratios for these selected sites all exhibit oil-type rather than gas-type signatures, in sharp contrast with the much larger methane anomalies located east of Lincoln. These are (in ppbv):

Site	Methane	Ethane	Propane	C1/C2	C2/C3
6002	4000	570	230	7.02	2.48
6041	4100	520	230	7.89	2.26
7058	7000	2140	1700	3.27	1.26
8008	5300	400	170	13.25	2.35
8022	5400	590	270	9.15	2.19

**Methane/ethane and ethane/propane ratios for the macroseeps in area 49104-01 are significantly gassier, typically ranging upwards of 250 for C1/C2 and 65 for C2/C3. Two of the largest magnitude seeps from sites 207 and 211 (both of which had blowouts during**



the installation of the monitor wells) are listed below in (ppmv): Methane/ethane and ethane/propane ratios for the macroseeps in area 49104-01 are significantly gassier, typically ranging upwards of 250 for C1/C2 and 65 for C2/C3. Two of the largest magnitude seeps from sites 207 and 211 (both of which had blowouts during the installation of the monitor wells) are listed below in (ppmv):

Site	Methane	Ethane	Propane	C1/C2	C2/C3
207	798800	3234	49	247	66
211	891543	3188	43	280	74

Although magnitudes can change rapidly, the compositions of soil gas and monitor well data are much more stable, allowing the definition of groups of data having common compositions that can then be related to a specific source.

Empirical compositional classifications derived from previous soil gas surveys conducted over producing fields have been established (Jones & Drozd, 1983). Typical ratios for soil gas or produced gases for different types of hydrocarbon deposits are:

Methane/Ethane Ratio	Ethane/Propane Ratio	Composition
> 100	> 5.0	Dry Gas
20 - 100	3.5 - 5.0	Gas
10 - 20	2.5 - 3.5	Oil and Gas/Intermediate
5 - 10	2.0 - 2.5	Oil
< 5	< 2.0	Heavy Oil/Degraded

Comparison of the above low-grade soil gas anomalies with these general empirical classifications clearly shows that the low level microseeps typical of these three areas are related to oilier sources, as might be expected for soil gas data collected directly over an oil field.

If the proposed monitor wells agree with the soil gas samples and show that there is no appreciable gas contained in the gravel aquifer in the A, B and C Phase 2 areas, then there would be no need for methane mitigation for buildings constructed within these areas. However, regardless of the lack of subsurface gas sources within these areas, no building should be constructed over any of the active or abandoned gas storage wells or the gas storage field. DOGGR regulations should be followed in these areas.

### 2.3 Soil Gas Hydrogen Sulfide

Hydrogen sulfide in detectable concentrations (Table 3, Plate 7) in the near-surface soils are very localized in areal extent with respect to the entire Playa Vista Development. Concentrations ranged from non-detect to 41 ppmv. Anomalous areas of hydrogen sulfide, with the greatest areal extent, are generally coincident with the western methane anomaly in Tract 49104-01 described above. Only 12 samples exceed 1 ppmv in concentration, and all but one of these samples lie within area 49104-01 where the largest macroseeps occur. The second largest anomaly of 27 ppmv does occur in association with a methane level of 5.33 % at site 9349 in area 49104-04. Ethane and propane anomalies are also present in the vicinity of this site, but are not coincident with the methane and

hydrogen sulfide at this location. A tighter grid spacing of soil gas should be applied in order to better define this hydrogen sulfide anomaly, followed by installing at least one monitor well for sampling of the Ballona aquifer. Two existing monitor wells, C-23 and C-28 should also be sampled from this general area for background control.

Although hydrogen sulfide has often been observed within archeological trenches, an evaluation of the many boring logs drilled and sampled on this site have shown that hydrogen sulfide does not occur systematically in the boreholes, and almost always within natural or shallow fill, such as La Brea sediments. The main source of the hydrogen sulfide appears to be from shallow recent swamp deposits and perhaps from the fill brought to the site from the La Brea area during the Hughes operations. It is very significant to note that the observations of H<sub>2</sub>S in the soil gas collected near the surface always occurs with significant methane anomalies. The H<sub>2</sub>S that was observed during the blowouts from installing boreholes or monitor wells was from isolated subsurface pockets of gas that was effectively trapped in the shallow subsurface. When the borehole or monitor well opened this isolated pocket the gases discharged quickly. Long term venting from the same monitor wells that recorded blowouts did not continue to discharge additional H<sub>2</sub>S. Apparently the H<sub>2</sub>S was then diluted by additional gas from deeper depths, which did continue to flow.

During the installation and monitoring of the methane vent wells, CDM and ETI/LADBS consultants inspected every vent well for H<sub>2</sub>S odors. In no cases were H<sub>2</sub>S odors detected in any long term vent wells, in spite of the fact that significant levels of methane gas was being vented from these same wells. The most important observation made with respect to hydrogen sulfide, is that it has not been detected in near-surface soils, except in the areas of advective methane seeps. Thus, outside of high-volume methane discharge areas, no hydrogen sulfide anomalies have been found in the near-surface soil gas.

Within the current density of sampling, it appears that all of the major methane and H<sub>2</sub>S discharge areas have been reasonably well defined. Closer-detailed sampling within the main methane anomaly areas has demonstrated that there are some very localized gas vents that can range from inches to 10's of feet in dimension, however, such vents are not usually isolated, with no other vents nearby. To improve due diligence ETI has requested that 50-foot centers be used to resurvey underneath planned building footprints before the foundation is laid. This is very important within areas having numerous advective vents, because this higher density soil gas data can aid in defining the areas requiring additional vent risers. However, in background areas this is probably not necessary. A combination of soil gas and monitor well data can determine the likelihood of finding any advective vents. If neither is anomalous, then it is reasonably safe to conclude that the assessment surveys are adequate.

Another safeguard for insuring that the current soil gas grids have effectively found most of the dangerous vents is to measure all of the biogenic gases that are generated by subsurface contamination. As described, below, carbon dioxide provides another potential safety factor for helping to define areas containing significant subsurface

contamination.

#### 2.4 Soil Gas Carbon Dioxide

Although carbon dioxide is generated by the biodegradation of all types of organic materials and must be used with caution in soil gas investigations, the presence of a concentrated petroleum source such as gasoline, diesel, kerosene, or even methane can cause a concentrated buildup of carbon dioxide in the subsurface. The average concentration of carbon dioxide in ambient air is only 0.03 percent. Biodegradation of typical soil organic matter generally yields carbon dioxide concentrations between 0.2 to 3-5 percent. Higher concentrations of carbon dioxide measured in various soil vapor samples collected in the vicinity of subsurface petroleum contamination often yields values as high as 5 to 30 percent, an indication that biodegradation is significantly enhanced. Such an enhancement of CO<sub>2</sub> is almost always found within an area containing a significant contaminant plume.

Bacteria consume hydrocarbons and generate carbon dioxide under aerobic conditions and methane under anaerobic conditions. Carbon dioxide and methane generated by this process are commonly the largest magnitude components in the soil gas mixture. In general, the longer the hydrocarbon source is present in the subsurface environment, the larger are the concentrations of these biogenically produced gases. Carbon dioxide also has the advantage that it is generated near the edges of the contamination because that is where the proper mixture of oxygen and organic contamination can be found. Within the heart of the contamination, the generation of carbon dioxide can be significantly reduced because of a lack of available oxygen. Thus an area containing high methane and low CO<sub>2</sub> is likely at the heart of a macroseep and an area containing moderate methane with large CO<sub>2</sub> is probably near the edge of a contaminate plume. In contrast, areas containing neither methane nor CO<sub>2</sub> is a true background area. Given this relationship, it can be very useful to measure these two biogenic gases (methane and carbon dioxide) and to use their contrasting behavior to help define the location of the more significant contaminant plumes.

Carbon dioxide (CO<sub>2</sub>) concentrations at PVD (Table 4, Plate 8) range from background levels of less than 3% to greater than 30%. These results indicate that significant aerobic degradation is occurring at specific locations on this site. The generation of CO<sub>2</sub> by this process is very rapid and can occur only where there is sufficient oxygen to support the consumption of the hydrocarbon contaminant source. Generally, as noted above, the areas of anomalous CO<sub>2</sub> occur as halos around the areas of advective methane seeps (methane anomalies) where oxidation consumes the available oxygen. Within an advective seep the hydrocarbon source may use up the available oxygen, causing the generation of CO<sub>2</sub> to cease. Thus areas of low CO<sub>2</sub> concentrations that are coincident with anomalous methane concentrations can define the seepage areas containing the most rapid rates of advection, and conversely areas where the methane and CO<sub>2</sub> are both anomalous may indicate more moderate vertical migration rates where the methane flux is in balance with the diffusion influx of oxygen from the air. Areas where both methane and CO<sub>2</sub> are near background

would confirm areas where there is no hydrocarbon seepage (i.e., true background).

The map of CO<sub>2</sub> values shown by Plate 8 was generated in order to use these relationships for due diligence in interpreting this regional soil gas data. In order to avoid mapping background variations the CO<sub>2</sub> contour values were set at 5, 7.5 and 10%. With these contour values, areas A, B and C have almost no CO<sub>2</sub> anomalies. Most high values, greater than 15 to 20%, particularly those that occupy more than one adjacent site, occur mainly within the main methane seepage areas in Tract 49104-01. The highest value of 32.43% occurs at site 9774 and is confirmed by low magnitude, more oily light hydrocarbons. At this site the C<sub>2</sub>/C<sub>3</sub> ratio is less than one (0.95) and the C<sub>1</sub>/C<sub>2</sub> ratio is nearly 10,000 (9286), suggestive of some minor oily contamination. The majority of the largest magnitude CO<sub>2</sub> sites (those greater than 15 to 25%) appear to occur near the edges of the main advective seeps. For example, sites 275, 267, 253, 242 and 233 coincide with the southwestern edge of the highest methane anomaly centered on Product 700. Sites 203, 267, 253, 242 and 233 define the western extent of this big methane anomaly. Sites 188 and 193 contain an anomaly that sits right in a low area (hole) on the eastern edge of the methane anomaly.

Sites 207 and 211, which lie right in the heart of the Tract 49104-01 methane anomaly are typical of the largest soil gas seeps. A comparison with the monitor well data from these same two sites shows that the concentrations at four feet are comparable to those measured at 50 feet below surface, suggesting the presence of advective flow from the sources in the Ballona gravel aquifer at depth to the surface. Bubbling seeps, as discussed above in Section 2.1 under Soil Gas Methane provide visible evidence of this active migration. Methane values near 100% (80 and 89%) and CO<sub>2</sub> values ranging from 0.5 to 1% (0.82 and 0.66%) for gas at these two sites support the interpretation of gas moving through the upper 50 feet of sediments without dilution or alteration.

In contrast to the very largest flux sites, there are many places where a moderate methane anomaly exists that is coincident with a CO<sub>2</sub> anomaly. These sites, such as, (734, 735) and (802, 803, 804, 805) and (811, 812, 813, 814), just to point out three specific cases, show locations where it is likely that the CO<sub>2</sub> is generated directly from the center of the methane seep (which is the food source). This would indicate that the flux of methane in these areas is slow enough to allow oxygen from the air to diffuse into the upper meter of soil and be used to generate these coincident methane/CO<sub>2</sub> anomalies. Examination of Plates 2 and 8 show that there are many such coincident anomalies.

No close detail sampling has been done on the eastern methane anomaly that occurs in Tract 49104-02 (Plate 2) of Phase 1. This large anomaly has a definite east-west orientation, and extends from the Phase 1, Tract 49104-02 area into area D of Phase 2. This Phase 2 area must be evaluated simultaneously with the western portion of the anomaly that lies within the Phase 1 area. Both the soil gas and the monitor wells from this anomaly exhibit a slightly oilier signature than the main 01 anomaly. This change in composition as compared to the monitor wells in area 49104-01 is very minor, much like the changes shown by the Centinela Creek macroseep bubbles. In both cases these changes are probably reflecting separate Pico reservoirs at depth. Low CO<sub>2</sub> with high

methane on the western portion of this anomaly suggests some advective flow, whereas the eastern portion (in area D) has large CO<sub>2</sub>, accompanied by moderately large methane, suggesting a lower methane flux rate, with considerably more oxidation occurring near the surface.

Where both methane (and its homologs, ethane, propane and butanes) are absent and there is no CO<sub>2</sub>, one may be fairly confident that there is no organic contamination in the soil at that location. CO<sub>2</sub> is always generated by shallow diagenesis because the bacterial filter is everywhere and oxygen is always present in shallow vadose zone soils and ground water near the edges of any subsurface contaminant plume. Large CO<sub>2</sub> magnitudes always signify the presence of shallow oxidation of an organic contaminant. The tendency for CO<sub>2</sub> to occur in larger concentrations near the edge of the oxidizing organic matter provides an advantage when coupled with direct detection of the organic contaminant, such as methane in this case. Adding CO<sub>2</sub> analyses increases the likelihood of finding the subsurface contaminant plume. Thus the CO<sub>2</sub> is very valuable, particularly when the soil gas grid has been undersampled as much as it has by using 300 foot centers within areas A, C and portions of area D of Phase 2. Area B is so under sampled that no assurances regarding the detection of gas anomalies can be made. However, a nearly complete lack of large CO<sub>2</sub> or methane anomalies within areas A and C suggests that no major contaminated areas have been missed in those portions that have been surveyed, in spite of the wide spacing used for the soil gas survey.

#### 2.5 Soil Gas BTEX (benzene, toluene, ethylbenzene and xylenes)

Concentrations of benzene, toluene and total xylenes (Table 2) are illustrated in Plates 9 and 10, respectively. There is, effectively, no benzene present in the vadose zone soil gases. Toluene concentrations range from non-detect to 6.4 ppmv while total xylenes concentrations range from non-detect to 6.7 ppmv. Toluene and total xylenes in detectable concentrations in the near-surface soils are very localized in areal extent with respect to the entire Playa Vista Development. As with hydrogen sulfide, anomalous areas of toluene and total xylenes, with the greatest areal extent, are generally coincident with methane anomalies in Tract 01 and Tract 02 described above. Toluene and total xylenes are generally not detected in near-surface soils except in the areas of advective methane seeps. The probable source of the toluene and total xylenes is from volatilization of the fill brought to the site from the La Brea area during the Hughes operations. The anomalous areas of toluene and total xylenes coincide with areas in which zones of the La Brea fill were described in borings. Water samples from the 50-foot gravel aquifer (MW 1 through MW 5) were collected by CDM from the monitor wells in Tract 03 and analyzed for BTEX. As shown by Table 6, the BTEX levels were below detection limits. Toluene and total xylenes are not detected at the surface, however, except in areas of advective methane flow.

It is interesting to note that the largest toluene and xylene anomalies appear to be associated with the eastern methane anomaly (sites 921 to 914) and with the more central methane anomalies (sites centered near 735, 813 and 803). These groups of methane anomalies are the oiliest (they have the largest ethanes, propanes and butanes). Additional

sampling and testing of the existing monitor wells needs to be done, plus the installation of several additional new monitor wells. Proposed locations for the new wells are at soil gas sites 970, 9006, 9726, 9845, 9848, 9830, 9787, 9050 and 9739.

Formal requests for the installation, sampling and analysis of these additional monitor wells was made to Playa Vista through LADBS on January 24, 2000 when these regional maps were formally presented during a joint technical meeting of the Playa Vista and ETI/LADBS consultants. Final interpretation of this soil gas data and this new monitor well data needs to be completed and this report rewritten whenever data from these new, additional monitor wells is available. Due diligence on this regional assessment report will not be done until this final task is completed.

## 2.6 Centinela Creek Bubbling Seep Isotope Results

Gas seeps containing ethane collected and analyzed in 1993 from the general area of the confluence of the Ballona and Centinela Creeks (Global Geochemistry, 1994, ETI, June 18, 1999 1st Progress Report). This data established the presence of advective flow macroseeps, which contained some ethane. These seeps have methane isotopic values that are very similar to those found and reported in the surface soil gases, and 50-foot Ballona gravel monitor wells by ETI in the April 17, 2000 report. A second reconnaissance along Centinela Creek, conducted on October 20, 2000 by Paul Witherspoon and Walt Merschat from SGS identified several bubbling seeps. These were noted and are mapped on Plate 1.

Three, free gas macroseeps were sampled from Centinela Creek at the area where the Global seeps were reported to have been collected. These three samples, denoted as A, B and C are plotted on Plate 12 along with the original Global macroseep samples and with the Ballona gravel monitor well data. Nine samples from the Southern California gas storage field (CDM, Sept. 5, 2000) and two gas samples from the El Segundo nonassociated, dry gas field are also plotted on Plate 12 for comparison with the Centinela Creek and Ballona gravel well samples. The two sets of Centinela Creek samples are similar. This Centinela Creek data establishes the compositional stability of this set of macroseeps and also confirms the presence of a significant pressure drive and volume required to keep these seeps active over at least seven years. The slightly different isotopic compositions of these samples from the Ballona gravel monitor wells supports the interpretation of deep "Pico" sources, which would be similar to one another, but would differ slightly from sand to sand because of source and migration dependent variations within the various Pico reservoirs.

The presence of these seeps also extends the area of known thermogenic seepage north, from the regional area surveyed to at least the confluence between Centinela and Ballona Creeks.

## 2.7 Riparian Wetlands Corridor Bubbling Seep Isotope Results

Another specific area of intense seepage has been found within the Riparian wetlands

corridor just south of soil gas site 817 near Teal Street (Figure 22, 23). A free gas sample was collected by volume displacement directly from one of these bubbling macroseeps on March 16, 2001 and sent to Isotech Labs for analysis. This data is listed in Table 5 and plotted on Plate 11. The methane concentration was 94.93%, the CO<sub>2</sub> was 1.90%, typical of the CO<sub>2</sub> values measured in the Ballona gravel aquifer in monitor wells 803 and 813, which were 1.97 and 1.54%. The ethane and propane were 3800 and 130 ppmv. The methane isotope of -56.91 parts per thousand fits right in with the main group of monitor wells from this area. Monitor well 803 and 813 are more than 200 feet away from the important group of seeps. Interpretation of the gravel aquifer gases suggests that the gap between the eastern and western methane anomalies in this area was caused by under-sampling related to the fact that access to this area was restricted. A new monitor well should be installed at this location to check for ventable gas and to allow proper interpretation of both the soil gas and the associated Ballona gravel aquifer anomaly.

Visual observations made on March 16, 2000 along this wetland corridor also reveal several macroseep areas that have never been sampled. In fact, as noted above, this wetland area was not sampled during the earlier Phase 1 soil gas surveys because the area was off-limits for surface access. Additional survey data must be gathered throughout this wetland corridor in order to properly complete this regional assessment. There is no question that this under-sampled wetland corridor does contain significant subsurface methane potential, which has not been properly assessed.

Gases from these bubbling macroseeps have nearly the same composition as the soil gases and the gases from the Ballona gravel monitor wells. This strong similarity suggests a common origin for these thermogenic gases. The presence of bubbling macroseeps associated with the largest soil gas and monitor well anomalies also confirms the presence of advective, pressure driven gas seepage over both land and water covered areas. The chemical and isotopic compositions of these gases collected from soil, bubbling macroseeps, and gas-charged aquifers clearly belong to a family of dry nonassociated gases, which are not connected to the deep Playa del Rey oil field, or to the Southern California Gas Storage Field. Direct comparison with the nonassociated dry gas produced from the Pico Formation on strike to the south from the El Segundo Oil field strongly suggests that these gases have probably been derived from similar deep sources, such as the Pico sands at depth. The seepage gases would have migrated from these Pico reservoirs that lie beneath the Playa Vista site. Gas shows from the driller's logs from the abandoned exploration wells suggests that these gases likely originate from between 500 to 3000 feet below surface.

## 2.8 Infill Detail Soil Gas in Tract 49104-01

As noted above in section 2.1 under Soil Gas Methane, the attempts to find and vent gas pockets within the top of the Ballona gravels was not successful. The observations regarding the numerous advective gas seeps demonstrated the very high spatial variability of the gas vents. In order to improve the placement of vent and monitor wells additional infill soil gas samples were collected within the main seepage area located in area 49104-

01. Data collection used ETI's four foot soil gas probe, and followed the same procedure as the regional data. However, in order to expedite turnaround and decision making most of the data was analyzed in the field using a MTI field-portable gas chromatograph. This instrument has the ability to detect only methane, ethane and carbon dioxide, with detection limits of 10 ppmv for methane and ethane and 0.01% for CO<sub>2</sub>. This data was used for better defining the local variation of gas seepage anomalies within the 01 area, where the largest macroseeps exist. All data within the calibration range of this instrument (i.e. 10 PPMV to 100%) are of the same quality as the laboratory data. However, below the detection limit of 10 PPMV the field-screening data is bottom truncated. A few of these samples were analyzed in a laboratory GC with lower-level detection limits to verify the quality of this data. None of these samples were field screened for H<sub>2</sub>S.

Contour maps for these three components are very similar to the regional maps, with two very important distinctions, one is that higher density sampling always reduces the areal size of the contoured anomalies because soil gas macro-vents are usually very limited in size. The second major distinction is the fact that this smaller estimate in the size of soil gas anomalies is usually accompanied by the presence of more individual (smaller sized) anomalies, resulting in increasing spatial variance. This is a very important concept because soil gas anomalies don't have to occupy a large aerial extent in order to provide a significant gas source under a building.

The best method for measuring the actual flux into the atmosphere would be to construct a large flux chamber that would cover the entire area of interest. This, of course is not practical, although the foundations of the buildings will become large flux chambers. The best alternative is to recognize that the earth also serves as a large flux chamber. When advective flow exists (driven by pressure), gas migrates toward the surface, enters the vadose zone and fills the permeable pathways with gas. A breakthrough into the atmosphere provides a pressure relief that acts to reduce lateral flow. Finding these breakthrough points is nearly impossible using EPA flux chambers because of the very small size of both the seeps and the chambers. The soil gas, on the other hand, offers a practical approach for finding these natural flux sites. This is because a natural equilibrium will be formed in which the gas flux from depth and the gas flux into the atmosphere must eventually balance. During this process a soil gas anomaly will form, taking its shape from the permeability of the adjacent sediments. Thus the sediments act as a choke, allowing leakage whenever the pressure is large enough, but also providing a near-surface reservoir in the soil pore space that will always retain some of the migrating gas. When in balance with the atmosphere, the soil gas will have a concentration that must be the same as the gas that leaked into the atmosphere at the exit point of the seep. If the pressure is reduced below atmospheric then the soil gas can, and will become diluted with air if the earth gases are not recharged from depth. Thus sites having large atmospheric flux have to be associated with soil gas sites which also have large, essentially equivalent concentrations at the exit point of the seep into the atmosphere. Lateral migration, both by advection and diffusion, will always occur within the near vicinity of the vertical pathway, building a soil gas anomaly. This lateral gas migration creates a soil gas anomaly with a stable "flux footprint" and concentration which can be



contoured in order to vector the direction from background toward the largest soil gas concentrations where the "flux pipes" must be located. By definition, then, these large magnitude soil gas sites must be the sources that control any advective seepage.

The application of a limited number of EPA flux chamber measurements without any guidance from the soil gas is a serious concern. Data from such a survey would have no value for predicting dangerous building sites, but could be misconstrued if used inadequately and incorrectly. The regional survey was conducted using 100 foot centers, which works very well for defining the main areas of concern. This spacing is, however, inadequate for placement of flux chambers. The reduction to 50 foot centers, with occasional infill, appears to provide a much better estimate of the actual size and shape of the individual soil gas anomalies, or "flux footprints". The success of this approach for locating "flux pipes" is demonstrated by the following two examples where an infill grid of 50 feet, coupled with a few additional offsets directed by the soil gas results has established the presence of two new active flux areas.

One significant new "flux pipe" was found in the Product 600 area. An expanded detail, contour map for methane is shown in Figure 24, where methane concentrations greater than 80% were found approximately 10 feet apart. Sites 9943A and 9943B had measured concentrations of 80.8 and 82.4%. In contrast, the largest values surrounding these two big macroseep sites have concentrations, which are generally less than 2000 ppmv (0.2%), and just 10 feet to the east of this large anomaly lies site 153, where only 80.9 ppmv (0.0081%) was measured. During the placement of an infill grid, site 9943 was placed halfway between sites 153 (80.9 ppmv) and 154 (612.5 ppmv). The value of 2040 ppmv measured at site 9943 was larger than either of the two original sites, but clearly did not find the macroseep in this area; however, previous observations by Walter Merschatt (ETI's field party chief) had noted free gas bubbling up to the surface in this general area. The extra infill sample (9943A) added halfway between sites 9943 and site 153 found a concentration of 807,870 ppmv, confirming the existence of a large magnitude soil gas anomaly, or "flux footprint" in this area.

A second offset sample at site 9943B provided additional confirmation, and indicated that the soil gas anomaly associated with this macroseep occupies an area at least 10 feet in width. Sites 9943C and 9943D were added to further define the northern and western edges. When placed into the regional map (as shown by Figure 24 and Plate 13) it is evident that additional samples should have been placed to the northeast, toward sites 9952C and 9940. A potential northeast - southwest alignment is suggested by this soil gas data.

The presence of two large magnitude soil gas anomalies located only 10 feet apart, when taken in context with the other anomalous samples shown on Plate 13 indicates a very high potential for significant seepage under this Product 600 construction area. It is important to note that these sites would probably never have been collected close enough for this confirmation without the visual observation of bubbles that had been noted earlier (Walt Merschatt, personal communication). Of even more significance, however, is the fact that this "flux footprint" confirms the presence of adequate conditions for vertical

migration directly from the underlying gravel aquifer, also confirming the existence of the previously observed "flux pipe". This large macroseep also confirms that the gravel aquifer is a potential source, and must be given serious consideration when evaluating any building sites that are located above the gas-charged portions of the aquifer.

Another excellent example of a very well-defined macroseep was found by adding a grid of samples near MMW-04. This monitor well had blown out for over an hour when it was first drilled and had also contained very anomalous free and dissolved gas concentrations in the water samples initially collected (ETI April 17, 2000 report). As shown by Plate 11 in the ETI April 17, 2000 report, contouring the data from the monitor wells appeared to define a possible area where deep gas might be entering the gravel aquifer from below. It was puzzling then that the initial soil gas contour maps (see Plate 2) did not show a large soil gas anomaly vertically over this very anomalous area of the gravel aquifer, as the data from this well would suggest. Only site 201 had noted the possible presence of an anomaly in this general area. In order to evaluate the potential for this gravel aquifer anomaly to be a gas source, an infill grid was placed between site 201 and monitor well MMW-04. Initially sites 004A through 004I were collected within the boundaries defined by sites 180, 181, 200 and 201, and only sites 004C and 004F showed appreciable values of 75.7% and 98.6%. Based on these initial infill results the remaining grid sites were added, up to 004Z.

In order to properly display this anomaly, an expanded view of this infill grid using a scale of 20 feet to the inch has been included in Figures 25, 26 and 27 for the methane, ethane and carbon dioxide. This infill grid provides one of the most important and well defined anomalies mapped by these soil gas surveys. Sites 004P, 004K and 004Z found very large concentrations of 75.8%, 97.8% and 100%, respectively, the largest soil gas concentrations measured anywhere on the site. The importance of these sites cannot be overemphasized. These anomalies showed that there is vertical seepage very close to MMW-04. Previous discussion and interpretations had suggested that the offset to the east of the very largest soil gas anomalies (shown by Plates 2 and 11 from the ETI April 17, 2000 report) might represent lateral migration from the gravel aquifer (near MMW-04), eastward towards sites soil gas 207 and possibly even to site 211. This anomaly shows that vertical migration does occur at this location (site 004Z), and also at site 9943A and B (discussed above). Both of these new macroseep areas defined by close-detail sampling have demonstrated that vertical soil gas anomalies are associated with the free and dissolved gas anomalies in the gravel aquifer, which had been previously defined by the monitor wells (such as, MMW-04 and MMW-153, which directly underlie these two macroseeps).

This 004Z anomaly was also found in an area that was too high in relative elevation to flood, significantly reducing the chances of visually seeing bubbling macroseeps in this area. Once defined by the soil gases, further examination of the area around this site did, however, result in the location of several very small macroseeps located between 004Z and 004Q, near the eastern edge of the anomaly where surface conditions allowed visual observation of the gas bubbles (Figures 28, 29). These small macroseeps were photographed and viewed over several days when conditions were just wet enough to

allow favorable detection.

Although, no visible seepage could be observed at site 004F, a small 4 foot by 4 foot plastic tent was placed over this site and sealed on it's edges by burial in the soil (see Figure 30). The soil conditions appeared to be too damp and tight to allow free gas bubbles to appear at the surface at site 004F, however this site did have a soil gas concentration of 98.6% methane at four feet below surface. Ambient air samples were taken under the tent over the next two days in order to establish whether or not there was any positive flux at this site. Within 24 hours the tent had ballooned up, and a concentration of 4.73% methane had developed under the tent (see Figure 31). Thus even though the venting was not visible, these measurements indicated that it was occurring and would have been overlooked if the detection of visible bubbles was the only method of detection used to find the "flux pipes".

This macroseep anomaly has also provided an opportunity to illustrate the range of concentrations within the anomaly and the enormous contrast between the anomaly and the adjacent background samples. The very largest methane magnitudes within the anomaly were contoured using intervals ranging from 90% (red) to 70% (yellow). The transition to background is shown using intervals from 10% (green) to only 1% (blue). General observations made over the site where other macroseeps had been noted had suggested that whenever soil gas concentrations exceeded the 1 to 25% range (10,000 to 250,000 ppmv) that visible macroseeps were likely to be found. Ethane also shows just how rapidly the magnitudes change at the edges of the macroseep area (see Figure 26).

Subsequent testing for ventable gas from the underlying gravel aquifer was unsuccessful at this site. Five TVW CPT vent boreholes were attempted at this location, three found no gas (TVW-35, TVW-75 and TVW-94), and two found only a small amount. TVW-93 was tested all the way from the top of gravel at 54.5 feet bgs (below ground surface) to the surface and found a minor gas pocket at 24.2 feet bgs. TVW-104 never found a point of refusal and was pushed to 82 feet bgs. As shown in Table 9, trace gas was recorded as present from 62 to 82 feet bgs. Clearly there is no gas pocket in the 50-foot deep gravel aquifer at this location, yet gas is venting at the surface. Five test wells, sampled from the gravel to the surface for free gas pockets within this soil gas anomaly provides conclusive evidence that deeper gas is venting straight through the Ballona gravels, and through the upper 50 feet of sedimentary cover at this location.

These two examples demonstrated that, while the presence of free gas bubbles could help in finding macroseeps, there could be no assurance that this method would be sufficient for insuring that all of the macroseep areas had been found and mapped. Tight clayey soils could also be the source of advective gas vents that were essentially invisible to this useful, but crude method of detection. Thus while mapping the presence of bubbles is conclusive evidence of advective flow, a lack of bubbles cannot be used to assume that advective flow is not occurring. Soil gas and monitor well data is essential for mapping the "flux footprints". Due diligence cannot be achieved by any other approach.

As noted earlier, numerous surface flux tests were conducted using an EPA flux chamber

over portions of the methane anomaly in Tract 49104-01 by CDM during the first quarter of 2001 (March 6, 2001 CDM letter report to David Nelson entitled "Methane Surface Flux Emissions for Product 700 Area, Lots 58 and 59 in Tract 49104-01"). Plate 16 shows the EPA chamber locations and the calculated flux values posted on top of the infill detailed methane map (Plate 13). A derivation of the flux equation and the flux data is given in Appendix D. The calculated flux values, which range from 0.000182 to 2.367 are in cubic feet of gas per square foot per day. As expected, the higher flux values do correlate regionally with the underlying soil gas data. For example, the larger values of 2 cubic feet/square foot/day occur over macroseeps (see Figure 20) located in the Product 700 area where the largest and most extensive soil gas anomalies also occur, and only background flux values occur over areas where the soil gas is uniformly low. However, because the flux chamber covers such a restricted surface area, it is possible for a single flux chamber measurement to fail at finding an advective seep, where the surface exit point may be very restrictive in size and is not marked by visible bubbles. Soil gas has the capability to approximately locate a gas venting site without actually sampling right in the vent hole. A flux chamber, on the other hand, has to exactly locate the vent hole in order to make an accurate flux measurement associated with an advective seep.

These examples demonstrates the ability of soil gas sampling to approximately locate areas which must be searched for active vents before accurate and real flux measurements can be made. The flux chamber was designed to measure diffusive flux and does not accurately measure, nor easily locate advective flux sites. In order to achieve useable flux results without having a very large number of individual flux stations, it is imperative that the flux chamber measurements be guided by a soil gas survey to vector in the potential location for the flux measurements.

## 2.9 Ballona Gravel Structural Maps

As noted above, the point of refusal, or so-called depth to the "Top of Gravel" was recorded during the many attempts to find subsurface gas pockets using the CPT method. Detailed testing procedures are given in Appendix C, and information on specific TVW boreholes are listed in Table 9. Over 120 CPT boreholes were pushed to refusal in the Ballona gravels using a Cone truck by CDM and 53 additional attempts were made by ECI. It was hoped that the finer sediments capping the 50-foot gravels would provide a seal, allowing free gas pockets to accumulate just below this interface. Both hand contoured and computer contoured maps were generated from this data in order to determine the potential correlations with the soil gas anomalies and any ventable gas pockets defined by these extensive CPT push-probe projects.

An initial set of field work maps were generated by Walter Merschat during several work sessions that were held at Playa Vista during January/February 2001 between the Playa Vista Consultants and the LADBS/ETI Consultants. These maps have been reproduced as scanned pdf files and have not been digitized (Walter Merschat "Top of Gravel" work products, February 2001). CDM provided a color scheme for their CPT borehole venting attempts, with blue used for TVW wells that would vent gas and green for wells that did

not vent any gas. As shown, by Figure 33, most of the TVW wells were not capable of venting gas. Only two main areas were responsible for most of the vented gas. Wells TVW-23 (Figure 32) and TVW-24 are the principal CPT holes that define these two main areas. An examination of the depth to the "top of gravel" shows that the areas where wells could be vented occurred mainly within an intermediate depth, which was not at the top of the gravel. Merschat's maps were generated with some slight geological/ geochemical bias related to the strong east-west lineations expressed by the geochemical soil gas maps.

A second attempt to correlate this data was made by Dr. David Becker, who prepared a set of computer-generated maps for this report. Three maps were generated, one with the ECI data, one with the CDM data and a third using both data sets. The CPT trucks used by these two separate efforts were slightly different in that the ECI data used an instrumented cone capable of creating an electric log of the sediment type as the probe was pushed and the CDM probe did not use the instrumented probe. Without the instrumented cone, the CDM probe could be pushed slightly deeper before refusal, so there is some bias between the two data sets. Plates 17, 18 and 19 are the CDM, ECI and ECI/CDM data sets, respectively. All of these very important data sets have been produced so that the reader of this report can view the available information. In the opinion of the authors, there is no correlation between the "top of gravel" and the locations of ventable gas.

### 3.0 SUMMARY AND CONCLUSIONS

A regional soil gas survey, consisting of 1621 sites sampled at four-foot depths, was constructed by compiling data from all of the previous three soil gas surveys that were conducted from October 1999 to January 2001. As shown by Plate 1, this includes both the Phase 1 and Phase 2 areas of the planned 1087 acre Playa Vista Development in Los Angeles, California. The purpose of the soil gas survey is to provide baseline data that reveals the areal distribution and concentration of methane gas in the near subsurface directly underlying the areas of planned construction. The survey also reveals the presence of methane homologs (ethane, propane, or butanes) derived from deep thermogenic source(s). Concern about the possible presence of toxic gases prompted additional analyses to determine the concentrations of BTEX and H<sub>2</sub>S in the soil gases.

Methane concentrations over the survey area are highly variable and range from background (<2 ppmv) to over 900,000 ppmv (90%). Anomalous methane concentrations (greater than 12,500 ppmv) are clustered within two main areas that were identified during a previous survey conducted in 1999 and reported in the ETI April 17, 2000 report. The most significant area of anomalous methane concentrations is more than 900 feet long and occurs in the western part of Tract 49104-01. The second highest methane anomaly, more than 1000 feet long, occurs in the southern part of Tract 49104-02. Based on the regional soil gas data, the total area of anomalous methane concentrations (greater than 12,500 ppmv) underlies only about 1.5% of the 1087 acre Playa Vista site. Other methane anomalies, of smaller areal extent, occur both between and north of the two largest methane anomaly areas. The anomalous methane seeps also appear to define elongate linear anomalies that trend N 65 E, N 7 W, and N 62 W, suggesting subsurface

structural or fracture control. Ethane, propane and butanes occur within each of the major methane anomalies, establishing the presence of a thermogenic source.

During rainy periods, or within wet areas, bubbling macroseeps have been observed within most of the areas containing the largest methane soil gas concentrations. Seepage also occurs east of Lincoln within the riparian wetlands corridor that runs east-west just north of the bluffs. Visual observations along this wetland corridor have revealed the presence of several macroseeps that were not sampled by the soil gas survey because of restricted access. One bubbling macroseep collected from this area was found to have nearly the same compositions as the soil gases and the dissolved gases in the 50-foot gravel monitor wells, indicating a common origin for these thermogenic gases. This macroseep fills a gap in the soil gas data, and strongly suggests the need for collecting additional geochemical data within this wetland corridor in order to properly complete the assessment of seepage throughout the planned development site.

Bubbling macroseeps near soil gas and monitor well anomalies indicates advective, pressure driven methane seepage. Chemical and isotopic compositions of soil gas, bubbling macroseeps, and gas-charged aquifers clearly define a family of dry nonassociated gases that are definitely not connected to the deeper Playa del Rey oil field, or to the Southern California Gas Storage Field. Comparison of Playa Vista site gas compositions, with the nonassociated dry gases produced from the Pico Formation in the El Segundo Gas Field, on strike southeast of Playa Vista, shows strong similarity. It is probable that the Playa Vista gas is also derived from the Pico Formation.

Free gas collected from macroseeps in Centinela Creek extends the area of thermogenic gas seepage north from the surveyed area to at least the confluence between Centinela and Ballona Creeks. Samples collected more than seven years earlier from this same area show strong similarity to those collected recently. The fact that these same seeps are still active demonstrates the long-term stability of the advective methane gas flow in this area. It is also significant that these Centinela Creek seeps are very similar, but slightly different from the main seepage area located within 49104-01. Small localized, but systematic changes in the chemical and isotopic compositions of close-spaced, but different Pico reservoirs at depth would be created by the source and/or migration factors that control the trapping and formation of specific gas reservoirs. Biogenic changes would generally be more random and less stable. Such systematic and stable changes, strongly supports the interpretation that the source of the seeps are close, but distinctly different traps formed in the Pico sands at depth.

This soil gas data shows that no large areas of methane leakage have been found within areas A and B, which are located over and adjacent to the Southern California Gas Storage Field. Closer spaced infill detail samples placed within the areas containing the gas storage wells also did not find any large magnitude soil gas anomalies. In addition, the chemical and isotopic compositions of the soil gases in these two areas have an oilier composition than either the soil gases or the deeper gases from the 50-foot gravel aquifer mapped east of Lincoln. These latter gases are similar to the known Pico production gases, and are very different from the original oil field gases, or from the gases currently

stored within the gas storage field. A direct comparison of the storage gas samples (nine new samples were provided for this comparison) with those from the soil gases and monitor well gases on the Playa Vista site demonstrate that the gas storage field is not the source of any of the gas seepage reported on the Playa Vista Development site.

Area C was also found to be devoid of large methane anomalies, and contains only background level soil gas concentrations. This area contains two abandoned wells (Del Rey #1 and #2) that must be properly reabandoned. Provided that no significant gas is found in the 50-foot gravel aquifer within any these three areas, and the Del Rey wells are properly reabandoned, then there should be no objection to development of all three of these areas. No construction is recommended directly over the gas storage field, and if the dissolved methane concentrations are low enough in the 50-foot gravel aquifer within these three areas, then it may be worthwhile to consider waiving the installation of methane mitigation and monitoring systems for all the portions of these three areas that are far removed from any existing wells.

The areal distribution of the toxic gases, hydrogen sulfide and BTEX, have been shown to be restricted to areas where advective methane seepage occurs. The sources for these gases appears to be from shallow, organic rich soils, which may have been supplemented by La Brea fill brought in by Howard Hughes operations during early construction activities on the site. The mechanism for these gases to migrate to the surface appears to be aided by the advective methane seepage. Even with methane as a carrier gas, the levels are low, and should be readily diluted to below concentrations of concern by the methane mitigation systems required within the areas of advective gas flow. These toxic gases do not appear to migrate to the surface without a methane gas carrier and do not require consideration outside the areas of high methane seepages.

Some portions of the Playa Vista site should be considered as a high potential methane zone due to the documented areas of high-volume surface macroseeps of methane gas. These results provide the basis (methane concentrations) for establishing a matrix table (designed by a methane engineer) with three levels of methane mitigation for prevention, detection, and monitoring of methane gas. These methane system requirements are to be implemented in areas of planned construction at Playa Vista. Results from this subsurface geochemical assessment may contribute important guidelines for improving the Los Angeles Methane Gas Code.

The presence of significant gas seepage requires building methane mitigation systems for any building constructed directly over the areas where anomalous concentrations of soil gas have been measured. In the interest of safety, no variances in these methane mitigation requirements should be allowed. These mitigation systems require extensive field-testing to determine their effectiveness in handling the gases venting naturally at Playa Vista before initial occupancy. The effectiveness of these mitigation systems must be periodically reevaluated in view of future seismic activity in the Los Angeles Basin. It should be noted that a small earthquake (magnitude 3.3) did occur on September 16, 2001 on the north edge of the site, on-strike with the Charnock Fault (Preliminary Earthquake Report). A larger magnitude earthquake at this location could easily cause the gas flux on

the site to increase significantly.

The installation of real-time monitoring systems installed in the vent risers in the Playa Vista buildings could provide significant protection, provided that they are properly calibrated and demonstrated to be responding to the actual gas levels, which accumulate under the buildings foundations. This testing has not been done, and must be completed as part of the due diligence before occupancy

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#### 4.0 RECOMMENDATIONS

- 1) As with the April 17, 2000 report, this additional regional soil gas data set collected within areas A, B and C in the Phase 2 area should be supplemented and confirmed by collection and analysis of the associated dissolved gases contained in the Ballona gravel aquifer. Using the soil gas anomalies as a guide, a minimum of 18 additional monitor well locations have been selected to supplement the original 42 already installed. Installation of these wells should follow the same procedures used in the ETI April 17, 2000 report, with both free gases and dissolved gases collected and analyzed as described in Appendix B of the ETI April 17, 2000 report. All monitor wells (both the original 41 and the 18 proposed new wells) should be sampled at one time in order to generate a uniform aquifer data base for evaluation of the free and dissolved gas content in the Ballona gravel aquifer.
- 2) As agreed to by Playa Vista and LADBS, 100 foot grid spacing soil gas surveys shall be conducted over all Phase 1 or Phase 2 sites before construction may proceed.
- 3) If soil gas concentrations exceed 12,500 ppmv, then an additional soil gas survey shall be conducted over the planned building foundation using no less than 50 foot centers. Flux chamber measurements should not be used without adequate guidance by gridded soil gas surveys.
- 4) Buildings should not be constructed over the Playa del Rey Gas Storage Facility in Areas A and B. For maximum safety the areas directly over the gas storage field should be reconfigured as open space.
- 5) The Del Rey 1 and Del Rey 2 abandoned wells in Area C should be reabandoned to current DOGGR standards if this area is to be developed.
- 6) Based upon the results of the regional soil gas survey under current grid spacing, and favorable results from the additional proposed wells discussed in (1) above, it does not appear that methane concentrations are high enough to warrant methane mitigation and monitoring for planned construction in Areas A, B, and C of Phase 2 provided that the above recommendations are adhered to.
- 7) The methane mitigation systems proposed for these buildings must be thoroughly tested to insure that their performance meets the specifications. Gas samples must be collected from the sampling ports located both above and below the membrane and analyzed in a laboratory for their methane through butane contents. Simultaneous sample collection must be performed in the vent risers in order to determine how closely the vent monitoring system meets the requirements of monitoring the gas concentrations under the slab and in reducing the methane gas concentrations below the membrane to below 3.75%. If these testing and reporting procedures are not followed, then a hazardous



condition could result.

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#### 5.0 REFERENCES

Anderson, T. H., Becker, D. F., and Witherspoon, P. A., 2001, Assessment of Geological and Geophysical Characteristics of the Playa Vista Development Site and Integration with Geochemical Observations, July 2, prepared for LADBS.

Barton, C.L., 1931, A Report on the Playa Del Rey Oil Field, in Summary of Operations, California Oil Fields, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 17, n. 2, p. 5-15.

Biddle, K.T., 1991, The Los Angeles Basin: An Overview, in Active Margins Basins; ed., Kevin T. Biddle, AAPG Memoir 52, p. 5-24.

Camp Dresser & McKee, April 30, 1999, Safety/Risk of Upset Technical Report for Playa Vista - Second Phase Project, 108 p.

Camp Dresser & McKee, October 12, 1999, Preliminary Area D Soil Gas Lab Results faxed to Playa Vista Distribution - from Tony Skidmore.

Camp Dresser & McKee, September 5, 2000, Sampling and Analysis of Gas from the Southern California Gas Company Playa del Rey Gas Storage Field, 5 p., tables, figures, plates.

Camp Dresser & McKee, March 6, 2001 letter report to David Nelson entitled "Methane Surface Flux Emissions for Product 700 Area, Lots 58 and 59 in Tract 49104-01"

Coleman, D.D., Meents, W.F., Liu, C. and Keogh, R.A., 1977. Isotopic Identification of Leakage Gas from Underground Storage Reservoirs, Illinois State Geol. Survey, Illinois

Petroleum, 111.

Coleman, D.D., 1979. The Origin of Drift-gas Deposits as Determined by Radiocarbon Dating of Methane. In: R. Berger and H.E. Seuss (Editors), Radiocarbon Dating, Proceedings of the Ninth International Radiocarbon Dating Conference, 1976. University of California Press, Berkeley, pp. 365-387.

Coleman, D.D., J.B. Risatti, and M. Schoell (1981), "Fractionation of Carbon and Hydrogen Isotopes by Methane-oxidizing Bacteria." *Geochimica et Cosmochimica Acta*, v. 45, p. 1033-1037.

Coleman, D.D., C.L. Liu, and K.M. Riley (1988) "Microbial Methane in the Glacial Deposits and Shallow Paleozoic Rocks of Illinois." In: *Origins of Methane in the Earth*, M. Schoell (Editor), *Chemical Geology*, v. 71, p. 23-40.

Coleman, D.D., 2000, Private communication, isotopic analyses of two gas samples from Pico gas sands at El Segundo Field, Los Angeles, CA.

Cordova, Simon, 1963, El Segundo Oil Field, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 49, n. 2, p. 45-52, plates, tables.

Davis and Namson, November 1999, Playa del Rey Field Open File Report, 1 Location Map, 3 Structure Contour Maps, 3 Cross Sections, No Text, Prepared for Playa Capital.

Davis and Namson, November 16, 2000, An Evaluation of the Subsurface Structure of the Playa Vista Project Site and Adjacent Area, Los Angeles, California, 56 p., figures, plates.

ENSR Consulting and Engineering, October 1997, Data Review and Limited Phase 2 Subsurface Site Assessment at Playa Vista Property, 64 p.

Exploration Technologies, Inc., November 29, 1999, Preliminary Comments Regarding Methane Gas Concerns for the Playa Vista Project Tract 49104-03 and Conditions to be Met for Issuance of a Building Permit, 4 p., 3 plates, appendices.

Exploration Technologies, Inc., April 17, 2000, Subsurface Geochemical Assessment of Methane Gas Occurrences, Playa Vista Development, First Phase Project, Los Angeles, California, 29 p., 7 figures, 6 tables, 12 plates, appendices.

Exploration Technologies, Inc., March 14, 2001, Concentration Of C1-C4 Gaseous Hydrocarbons, BTEX Aromatic Hydrocarbons, Carbon Dioxide And Hydrogen Sulfide In Soil Gas At Tract-03 Beneath Fountain Park Apartments Following Installation Of Concrete Pilings.

Global Geochemistry Corp., January 20, 1994, Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina del

Rey, California, 4 p., tables, graph.

Group Delta Consultants, Inc. February 5, 1999, Geotechnical Recommendations Increment 1, Area De, Playa Vista Development, 13255 Jefferson Boulevard, Los Angeles, CA, 24 p.

Hodges, F.C., 1944, Gas Storage and Recent Developments in the Playa Del Rey Oil Field, in Summary of Operations, California Oil Fields, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 30, n. 2, p. 3-10.

Integrated Environmental Services, Inc., May 28, 1999, Responses to Methane Gas Concerns - Playa Vista 61 p.

James, A.T., 1983, Correlation of natural gas by use of carbon isotopic distribution between hydrocarbon components. AAPG Bulletin, 67-1176-1191.

James, A.T., 1990, Correlation of reservoired gases using the carbon isotopic composition of wet gas component. AAPG Bulletin, 74-1441-1448.

James, A.T., and B.J. Burns, 1984, Microbial alteration of subsurface natural gas accumulations. AAPG Bulletin, 68, 957-960.

Jones, V.T., and Drozd, R.J., 1983, Predictions of Oil and Gas Potential by Near-Surface Geochemistry: A.A.P.G., Bull., Vol. 67, No. 6, p. 932-952.

Jones, V. T. and Burtell S. G., 1996. Hydrocarbon flux variations in natural and anthropogenic seeps, in D. Schumacher & M.A. Abrams, eds., Hydrocarbon migration and its near-surface expression: AAPG Memoir 66, p. 203-221.

Jones, V.T. and Agostino, P. N., 1998, Case Studies of Anaerobic Methane Generation at a Variety of Hydrocarbon Fuel Contaminated Sites, Presented at the National Ground Water Association, 1998, Houston, Texas

Jones, V.T., Matthews, M.D., and Richers, D., 2000, Light Hydrocarbons in Petroleum and Natural Gas Exploration. Handbook of Exploration Geochemistry: Gas Geochemistry. Vol. 7., Chapter 5, Elsevier Science Publishers.

Merschhat, Walter, 2001, Top of Gravel work products, February, pdf format only.

Map 1

Map 2

Map 3

Map 4

Map 5

Map 6

Map 7

Map 8

Map 9

Map 10

Map 11

Map 12

Map 13

McLaren Environmental Engineering, May 8, 1987, Site Investigation and Evaluation of Remedial Measures Report, Howard Hughes Property Plant Site, Los Angeles, California, 398 p.

Preliminary Earthquake Report, September 16, 2001, event ID # ci09564425, reviewed by a USGS seismologist, Southern Ca. Seismic Network, Caltech Seismological Laboratory.

Riegle, J.R., 1953, Gas Storage in the Playa Del Rey Oil Field, in Summary of Operations, California Oil Fields, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 39, n. 2, p. 17-33.

Sepich Associates, Inc., April 2, 1999, Methane Recommendations Relating to Issuance of Mass Grading Permit at Proposed Playa Vista Project, Los Angeles, CA, 7 p.

Sepich Associates, Inc., January 30, 2001, Playa Vista Methane Prevention, Detection, and Monitoring Program, 6 p. 1 table, 1 plate.

Slossen, James E., 1971, Engineering Geology Review of the February 9, 1971 Earthquake-San Fernando - Sylmar Area, Journal of Petroleum Engineers of AIME, SPE paper number 3457.

Thompson, K.F.M., 1966. Postulated Generation of Bacterial Methane from Seepage Petroleum in Sea Floor Sediments of the Gulf of Mexico, in D. Schumacher and M.A. Abrams, eds., Hydrocarbon migration and its near surface expression: AAPG Memoir 66, pl. 331-334.

Wright, T.L., 1991, Structural Geology and Tectonic Evolution of the Los Angeles Basin, California, in Active Margins Basins; ed., Kevin T. Biddle, AAPG Memoir 52, p. 35-134

**LETTER NO. 220**

David C. Voss, Jr.  
Voss & Associates  
Marina Towers  
4640 Admiralty Way, Suite 800  
Marina del Rey, CA 90292-6602

**Comment 220-1**

It is high time that Los Angeles addresses urban sprawl. By continuing to build further and farther away from city centers, our city creates problems that are becoming increasingly difficult to solve.

Not only does it mean that everyone who lives in the Valley, for instance, and commutes to the Westside loses two hours of their lives sitting in gridlock every day, but it means that our city has to pay for more infrastructure to service the communities that are being built further and further away from existing roads, libraries, and police and fire stations.

While sprawl will always be a problem for our city, there is an opportunity to reverse the trend. Approving urban developments like Playa Vista will put people where the jobs are, reducing commuting time, utilizing existing infrastructure and concentrating our population where it can be more easily serviced by public transportation and protective services.

Opponents of the project look at NIMBY [Not In My Back Yard] issues, but it is high time that we look at the big picture of where our city is headed. Projects like Playa Vista need to move forward on the Westside and in other parts of the city because they simply make sense.

**Response 220-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 221**

Gwen Vuchsas  
SECO Investigative Services  
4553 Glencoe Avenue, Suite 370  
Marina del Rey, CA 90292

**Comment 221-1**

Playa Vista received a vote of confidence by having the Westchester Neighborhood Council endorse the next phase of development--The Village.

Playa Vista is bringing life and vitality to the Westchester area after years of neglect. Roads had not been fixed until Playa Vista came around. The area at the southwest corner of Lincoln and Jefferson, which was once a dumping ground for old tires and other trash, is now a thriving freshwater marsh thanks to Playa Vista.

The Village is being planned for the old runway area once used by Howard Hughes. If The Village is built and designed to the same standards exhibited by Playa Vista to date on the other parts of the property, this proposal should win a lop-sided vote of support from the City Council.

**Response 221-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 222**

Daniel Walker  
7416 West 82nd Street  
Los Angeles, CA 90045

**Comment 222-1**

We support Playa Vista phase 2 in concept but recommend that the City of Los Angeles insist on additional traffic mitigation. We are eager to visit the new Village shops, restaurants, etc., which will be conveniently close to our house on 82nd Street in Westchester. However, the proposed mitigations by Playa Vista to help reduce traffic congestion are very minimal.

We support the minor phase II improvements to Jefferson and Centinela roads near Playa Vista. We also support the proposed clean air shuttle and Rapid bus service, which Playa Vista will help pay for several years. This will be helpful to many Village workers, students, and seniors. However, how many of the upscale Playa Vista residents will take the bus, especially for trips outside Playa Vista? To get from Playa Vista to key destinations like LAX, Santa Monica, Marina Del Rey, downtown LA would require waiting for at two buses. We can do better.

**Response 222-1**

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15 of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

The transit enhancement mitigation measures proposed in the Draft EIR are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of other transit riders in the area. In addition, the transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the mitigation would be effective to

reduce potentially significant impacts to less than significant levels with as little as 1 to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. Please refer to Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455 for a more detailed discussion.

**Comment 222-2**

Restoring the Ballona fresh water wetlands and salt water marshes for birds, animals, and people to enjoy must continue to be a priority for Playa Vista phase II.

**Response 222-2**

The Proposed Project would complete the final portion of the Riparian Corridor, an essential link in the Freshwater Wetland System (which includes the Freshwater Marsh and Riparian Corridor). The completion of this habitat is a priority for the Proposed Project.

In December 2003, the Applicant completed the transfer of all parcels west of Lincoln Boulevard, other than the Freshwater Marsh, to the State of California. With completion of this transaction, the future restoration of the salt marsh will be undertaken by other entities.

**Comment 222-3**

We strongly believe that existing conditions along Lincoln Blvd. the 405 freeway near Playa Vista are already unacceptable today before phase I has even been partially implemented. The proposed road improvements to Lincoln south of Jefferson from phase I mitigations were a step in the right direction, and we especially support the proposed bike lanes and bike paths along Lincoln (south of Jefferson to LMU Drive). The additional turn lane from Lincoln Blvd. north to Culver Blvd and extra lane along Culver to the Marina 90 freeway will help traffic somewhat. The planned Marina Freeway bridge over Culver Blvd. will also help somewhat considering the simultaneous high density development coming to the Marina area and Playa Vista. However, [P]hase II offers no similar traffic mitigations. We were disappointed that the Coastal Commission has yet to approve any improvement to Lincoln Blvd. north of Jefferson, especially over Ballona Creek.

**Response 222-3**

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/ Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.



The comment appears to refer to a Caltrans improvement known as “Lincoln North,” which was denied by the California Coastal Commission in January 2003. The Lincoln North improvement is not required for implementation of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR.

These comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

#### **Comment 222-4**

The [P]hase II proposed bike paths are also a nice improvement. We like the proposed bike lanes proposed within Playa Vista and hope that adequate, well lit, safe bike parking will be available for the visitors and employees at The Village. However, at a minimum, we recommend that you insist that the developer provide a safe bike connection to/from Playa Vista to both the Ballona Creek bikeway and to the beach bike path through Marina Del Rey on Admiralty Way. Widening Lincoln over Ballona Creek and/or adding a 2nd bridge to safely accommodate both bikes and cars along Lincoln is essential.

#### **Response 222-4**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Pursuant to State CEQA Guidelines, the Draft EIR analyzes the impacts of the Proposed Project and where necessary proposes mitigation measures to address the Project’s impacts. As indicated in Subsection 3.4.1, Proposed Project Impacts, of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 961, the Project’s Class II lanes would link with other bikeways, would be compatible with adjacent Playa Vista First Phase Project bikeways and provide enhanced service for the Proposed Project’s population, Playa Vista First Phase Project’s population and regional travelers passing through the site on their longer journeys. The new bikeways would improve the quality of bikeway service. The regional bike trails mentioned in the comment are identified in Subsection 2.2.2 of Section IV.K.(3) on page 956. Further connectivity with Class I Trails would not serve to mitigate any significant impacts identified in the Draft EIR.

As described in the Draft EIR on page 297, “The Project’s proposed bikeway routes have been designed to link major activity centers within the Project site (e.g., Village Center retail uses and proposed residential uses) and as such, provide an alternative means of transportation to the automobile. The Project’s proposed network of interconnected bicycle routes provides access throughout the Project site and connects to, and expands on, the bicycle network within the adjacent Playa Vista First Phase Project. The bicycle facilities are being designed to meet all applicable safety standards. In addition, bicycle racks would be provided in public areas (e.g., parks, community facilities, etc.) and in the Village retail area, and bicycle storage areas would be provided within the residential buildings.”

**Comment 222-5**

In addition, we would like to see a Light Rail connection from the existing Green Line in El Segundo to LAX, Westchester, Playa Vista, Marina Del Rey, Venice, to Santa Monica, and connect to the planned Expo Light Rail, north/south along Lincoln Blvd. corridor and/or along 405 freeway/Sepulveda corridor. In the future, the fast rail connection should be extended further north to UCLA, Westwood, and to San Fernando Valley. Playa Vista should be connected to the growing Southern California rail network, which now has over 100 Metrolink and Metrorail stations.

I have traveled daily along Lincoln corridor for about 20 years. Unfortunately, traffic and development have continued to grow along many sections of this corridor. This busy corridor needs to be improved for all forms of mobility: car, bike, and mass transit. Improving flow along Lincoln Blvd. will reduce air pollution and improve quality of life for employees on the Westside and my neighbors who live in Playa Vista, Westchester, Venice, El Segundo, and Santa Monica.

**Response 222-5**

These comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers. As discussed in Response 222-1, with mitigation the Proposed Project would not result in any significant traffic impacts.

There are no current plans for light rail from the Green Line to any of the destinations identified in this comment. The Lincoln Corridor Task Force is currently studying alternatives to improve traffic conditions on Lincoln Blvd., including a Light Rail alternative. With implementation of the mitigation program discussed in the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR on page 216, the Proposed Project would not have any significant traffic impacts. Nevertheless, as discussed on page 7 of Appendix K-1 of the Draft EIR, in the event the Lincoln Corridor Task Force adopts a set of regionally superior traffic improvements that are equivalent or superior in mitigating the project-related traffic impacts of the Proposed Project, prior to implementation of the Proposed Project or its mitigation measures the City may require the Proposed Project to contribute towards the implementation of the Task Force's improvements in an amount not greater than the Project improvements being superceded.

**LETTER NO. 223**

Robert Welder  
8832 Villanova Avenue  
Los Angeles, CA 90045

**Comment 223-1**

I strongly support The Village project because it is the essential component to completing Playa Vista and making it successful as an inclusive, diverse mixed-use community. The Village will provide critically needed housing near local employers, as well as create new jobs for this community.

Additionally, I support the current proposal which will provide needed open space and park land--through the preservation of land west of Lincoln and north of the Ballona Channel as open space, as well as the creation of 23 acres for new parks and open space within the development.

This is an important project that should be approved by the City. I strongly encourage the City of Los Angeles to approve The Village at Playa Vista.

**Response 223-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 224**

Dawn Wendl  
2864 Pinckard Avenue  
Redondo Beach, CA 90278

**Comment 224-1**

Many roads around Playa Vista have been neglected for decades and have been a contributing factor to the area's traffic problems for years. Playa Vista committed more than \$100 million in its first phase to improving transportation in the immediate area and in approximately 100 square miles of the region. Those improvements have already helped traffic flow.

The Village will build on Playa Vista's commitment to improve flow in the surrounding area and encourage mass transit. Developing The Village will allow many of its residents to live closer to where they work, thus shortening the time they spend on roads and freeways. Also, the installation of state-of-the-art, computerized traffic control systems will further improve flow.

What's unique and impressive about the traffic mitigation measures for The Village is the reach and diversity of programming. For example, the transportation plan also calls for extended bus and shuttle service from Playa Vista to major employment and entertainment centers, such as Fox Hills Mall, Howard Hughes Center, Marina del Rey, UCLA and Century City.

The Village is a solid proposal with an excellent transportation component. I support adoption of the EIR by the City Council, and look forward to seeing the improvements go from concept to implementation.

**Response 224-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 225**

Greg Wenger  
Greg Wenger Photography  
Post Office Box 9550  
Marina del Rey, CA 90295

**Comment 225-1**

The transportation infrastructure in our part of West Los Angeles is outdated, in need of modernization and reliant on Playa Vista for capacity building. The Village plan does just that. It includes the completion of the Jefferson widening adjacent to Playa Vista (from Lincoln all the way to Centinela), as well as completion of a new four- to six-lane road within Playa Vista called Bluff Creek Drive, allowing traffic a new east-west alternative running parallel to Jefferson.

Major enhancements to the local and regional transit system are also proposed, including adding buses to two lines to improve frequencies and ease overcrowding, establishing a new bus route serving the area from the Fox Hills Transit Center to the Green Lane, and extension of a bus line running from the Fox Hills Transit Center to the Village and Playa del Rey.

Furthermore, installing the latest in computerized traffic control systems will improve flow, and there will be measures during construction to minimize traffic disruptions.

These improvements will have a positive impact throughout the region, and are significant in that they promote public transit and a live/work balance that is a rarity in Los Angeles.

**Response 225-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 226**

Marvin West  
11990 Art Street  
Sun Valley, CA 91352

**Comment 226-1**

The Los Angeles Times never seems to say a kind word about development, but recently, the paper changed its tone. On the first page of the paper, the Times called Playa Vista a “new urban model.”

Such praise doesn’t come lightly, but it’s deserved. I’ve lived in the area a long time, and seen concepts for Playa Vista come and go. I’m impressed with the development, especially the number of parks and the diversity of architecture.

What I don’t understand is why the middle area where The Village is supposed to go isn’t approved already. A growing community like Playa Vista needs retail to serve the homeowners’ needs. And it won’t hurt to add more housing to an area hungry for new homes.

The City should move The Village forward without delay.

**Response 226-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 227**

William West  
H. B. Drollinger Co.  
8929 South Sepulveda Boulevard, Suite #130  
Los Angeles, CA 90045

**Comment 227-1**

After reviewing the draft environmental impact report for The Village at Playa Vista, the numbers tell a compelling story and list many reasons this project should be approved. They include:

- The Village at Playa Vista will further assist in alleviating the housing crisis in this region and the City of Los Angeles by providing 2,600 new housing units at varying prices
- Developing The Village will create nearly 8,000 construction jobs for our local workforce.
- There will be an additional 1,000+ retail, commercial and related jobs in The Village.
- The Village will result in new City of Los Angeles tax revenues of \$4 million annually, plus additional revenue to Los Angeles County and the region.

This adds up to one clear conclusion: The Village is good for Los Angeles and should be approved by the City Council, and therefore, we urge the Planning Commission and City Council to approve this much-needed development.

**Response 227-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 228**

Denis Will  
12770 Pacific Avenue, #8  
Venice, CA 90291

**Comment 228-1**

With its Village proposal, Playa Vista is going to add 2,600 new single family homes, condos and apartments to a house-starved west Los Angeles real estate market. The project is going to add thousands of construction jobs during a time when the economy could use a shot in the arm. I also understand that the Village will generate \$4 million a year to the City of Los Angeles' general fund.

What's not to like? This is a smart project that is far smaller and far smarter than what was originally planned for the site. It provides for long overdue transportation improvements, the addition of new parks and public transit enhancements that extend throughout the west L.A. region.

I support the Village. It's good for the City and good for the local area. I encourage the City to approve it in its current form.

**Response 228-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.



**LETTER NO. 229**

Cindy Williams  
C. W. Business Center  
8939 South Sepulveda Boulevard, #102  
Los Angeles, CA 90045-3605

**Comment 229-1**

Playa Vista's developers continue to live up to their promises to make this a place where people can live, work and play. Their plans for the Village are respectful of the environment and contribute well more than Playa Vista's share to improve the traffic situation on the Westside.

The Village at Playa Vista will be a great addition to this community and the area, and I hope city leaders will ignore Playa Vista's critics and green-light this project.

**Response 229-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 230**

William J. Wolitarsky  
Community Bible Church  
6133 Bristol Parkway, #270  
Culver City, CA 90230

**Comment 230-1**

I have lived at Playa Vista since April of this year; and I love every day I have been here. All of my expectations have been met and more to date.

However, the only thing that would make this neighborhood significantly better is the addition of the restaurants and stores planned for The Village.

Every community needs the local restaurant hangout and the corner barbershop. Ours is no exception. The Village must be approved to round out the experience that is Playa Vista.

**Response 230-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 231**

Danny Wong  
126 Rees Street  
Playa del Rey, CA 90293

**Comment 231-1**

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

**Response 231-1**

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

**LETTER NO. 232**

K. Wong  
5801 South Kiyot Way, #12  
Playa Vista, CA 90094

**Comment 232-1**

I read in the Los Angeles Times that Playa Vista has become a model for urban planning. The development received that distinction, in part, because of the higher densities for housing.

Those densities make good sense because it helps to create more open space. But more importantly, higher densities create opportunities for people to use public transit.

I understand that The Village will have a public transit hub for buses that will take people to employment centers in the region as well as to local shopping districts. What a great idea!

It's about time that the City implement sound land use and transit planning. I support what Playa Vista is trying to do, and wish others would do the same.

**Response 232-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 233**

Lew Wright, Sr.  
FASTFRAME of Westchester  
8925 South Sepulveda Boulevard  
Westchester, CA 90045-3603

**Comment 233-1**

As a small business owner In Westchester, I understand that the new plans for Playa Vista's scaled down second phase do not include the major retail component originally envisioned.

By reducing the size and scope of the commercial development at The Village, Playa Vista has assured that major retailers will not impact area small businesses like mine. In fact, the new residents who move into The Village will likely patronize and improve my business, as well as, other local merchants.

I support The Village and look forward to its completion. Thank you.

**Response 233-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

**LETTER NO. 234**

Nicole Xanten  
9018 Villanova Avenue  
Los Angeles, CA 90045

**Comment 234-1**

The Village plan is projected to create 8,000 construction jobs and generate \$4 million a year in tax revenues to the city. At the same time, The Village is providing desperately needed new housing to the area and enabling the development of a neighborhood retail center for Playa Vista residents.

Right now, this property is abandoned, has no environmental value and is an eyesore. Also, it sits on abandoned land directly adjacent to the first phase of development at Playa Vista.

The Village is a natural next step for Playa Vista. It is a sensible and reasonable development plan that will improve the local community and generate millions of dollars in revenue for our cash-strapped city government.

The Village deserves prompt city approval.

**Response 234-1**

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.