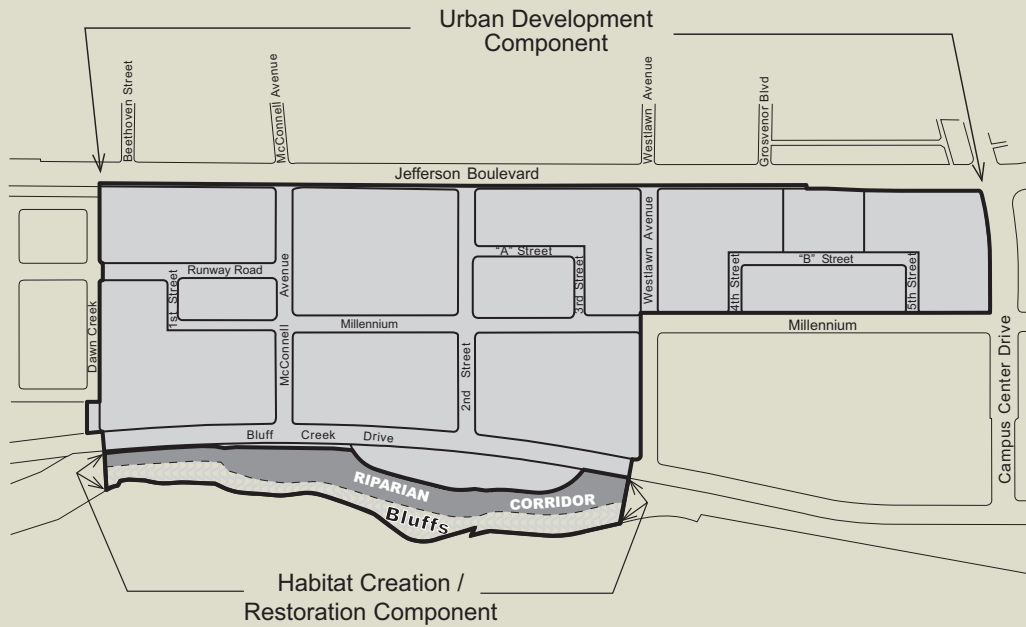


# FINAL ENVIRONMENTAL IMPACT REPORT (FEIR) VILLAGE AT PLAYA VISTA



## VOLUME I

2004

# FINAL ENVIRONMENTAL IMPACT REPORT

## VILLAGE AT PLAYA VISTA

City of Los Angeles/EIR No. ENV-2002-6129-EIR  
(PA-ZC-GPA-SUB)  
State Clearinghouse No. 2002111065  
Westchester-Playa del Rey Planning District  
Council District 11

### **FINAL ENVIRONMENTAL IMPACT REPORT**

This document comprises the second and final part of the Environmental Impact Report (EIR) for the project. The Draft EIR, previously circulated for public review and comment, comprises the first part. The Draft EIR is available for review in City Hall Room 720, and at the following libraries: Culver City Library, UCLA Library, Marina del Rey Library, Central Library, Westchester/Loyola Village Library, Venice Library, and Mar Vista Library

- Project:* Village at Playa Vista: The Project's Urban Development Component, containing 111.0 acres, would consist of an integrated, mixed-use, master planned community comprised of residential, commercial, recreational, and community-serving uses with 2,600 dwelling units, 175,000 sq.ft. of office space, 150,000 sq.ft. of retail space, and 40,000 sq.ft. of community-serving uses. An Equivalency Program would allow a limited exchange of office uses for additional retail uses and/or assisted living uses. 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.
- Required City Actions:* Amendments to the Westchester / Playa del Rey Community Plan and the existing Playa Vista Area D Specific Plan with appropriate zone changes, a Development Agreement, a Conditional Use, a Vesting Tentative Tract Map, and various other discretionary approvals as the City may find necessary to implement the project.
- Applicant:* Playa Capital Company, LLC  
5510 Lincoln Blvd., Suite 100  
Playa Vista, CA 90094

**Los Angeles City Planning Department  
Room 720 City Hall, 200 North Spring St., Los Angeles, CA 90012**

April 2004

EIR No. ENV-2002-6129-EIR  
(PA-ZC-GPA-SUB)

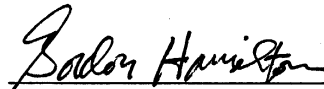
SCH No. 2002111065

Project Name: Village at Playa Vista

RECOMMENDATION FOR EIR CERTIFICATION

Pursuant to California Code of Regulations, Title 14, Section 15090, this EIR has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and based on the information available may be accepted and considered prior to making a final decision on the project. The decision-making body must certify that it has reviewed and considered the information contained in this Environmental Impact Report prior to making such decision.

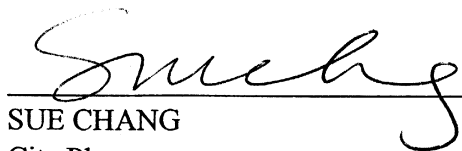
Approved by:



\_\_\_\_\_  
GORDON HAMILTON

Deputy Director

Submitted by:



\_\_\_\_\_  
SUE CHANG

City Planner

---

**TABLE OF CONTENTS**

---

**VOLUME I**

	<u>Page</u>
<b>I. EXECUTIVE SUMMARY .....</b>	<b>1</b>
A. Introduction.....	1
B. The Proposed Project .....	3
C. Project Location .....	7
D. Project Background .....	12
E. Areas of Controversy .....	15
F. Alternatives .....	17
G. Summary of Project Impacts.....	30
<b>II. CORRECTIONS AND ADDITIONS .....</b>	<b>166</b>
1. Project Description.....	166
2. General Description of Environmental Setting .....	171
3. Earth.....	172
4. Air Quality.....	176
5. Hydrology.....	178
6. Water Quality .....	179
7. Biotic Resources.....	185
8. Noise.....	186
9. Natural Light-Shading.....	193
10. Artificial Light and Glare .....	199
11. Land Use .....	200
12. Mineral Resources .....	207
13. Safety/Risk of Upset.....	208
14. Population, Housing and Employment.....	215
15. Traffic and Circulation.....	216
16. Parking .....	231
17. Bicycle Plan.....	233
18. Fire Protection.....	235
19. Police Protection .....	239
20. Schools .....	240
21. Parks and Recreation.....	241
22. Libraries .....	243
23. Energy .....	244

**TABLE OF CONTENTS (CONTINUED)**

**VOLUME I (Continued)**

	<u>Page</u>
24. Water Consumption.....	245
25. Wastewater.....	246
26. Solid Waste .....	247
27. Visual Qualities (Aesthetics and Views).....	248
28. Paleontological Resources.....	258
29. Archaeological Resources.....	259
30. Historic Resources.....	260
31. Growth-Inducing Impacts .....	262
32. Significant Irreversible Impacts .....	263
33. Alternatives .....	264
34. Organizations and Persons Contacted .....	266
35. List of Acronyms.....	267
36. References .....	268
37. Appendices.....	269
<b>III. MITIGATION MONITORING AND REPORTING PROGRAM .....</b>	<b>298</b>
1.0 Introduction.....	298
2.0 Mitigation by Environmental Topic .....	304
3.0 Attachments.....	386
<b>IV. LIST OF NEW REFERENCES TO THE FINAL EIR.....</b>	<b>433</b>
<b>V. LIST OF NEW APPENDICES TO THE FINAL EIR .....</b>	<b>440</b>
<b>VI. TOPICAL RESPONSES TO COMMENTS .....</b>	<b>444</b>
TR-1:..... Playa Vista Transportation Model	445
TR-2:..... The Village at Playa Vista Trip Distribution	451
TR-3:..... Related Projects	453
TR-4:..... The Village at Playa Vista Transit Plan Effectiveness	455
TR-5:..... Neighborhood Traffic Impacts	458
TR-6:..... Relationship with Community Plan Policies	460
TR-7:..... Study Intersections	463
TR-8:..... Significant Impacts May Remain	468
TR-9:..... Traffic: First Phase Project (VTTM 49104) Condition No. 116	470
TR-10:..... Alternative 2010 Baseline Scenario – Additional Mitigation Measure	472

---

**TABLE OF CONTENTS (CONTINUED)**

---

**VOLUME I (Continued)**

	<u>Page</u>
TR-11: Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area.....	474
TR-12:.....	Soil Gas 477
TR-13:.....	First Phase Project Litigation History 482

**VOLUMES I, II AND III**

**VII. RESPONSES TO WRITTEN COMMENTS .....486**

**VOLUME IV**

- APPENDIX A: Earth**
- APPENDIX B: Air Quality**
- APPENDIX C: Water Resources**
- APPENDIX D: Biotic Resources**
- APPENDIX E: Noise**
- APPENDIX F: Safety/Risk of Upset**

**VOLUME V**

- APPENDIX F: Safety/Risk of Upset (Continued)**

**VOLUME VI**

- APPENDIX F: Safety/Risk of Upset (Continued)**
- APPENDIX G: Traffic**
- APPENDIX H: Schools**
- APPENDIX I: Utilities**

---

**TABLE OF CONTENTS (CONTINUED)**

---

**VOLUME VI (Continued)**

**APPENDIX J: Cultural Resources**

**APPENDIX K: Draft EIR Comment Letter Submittals**

**VOLUME VII**

**APPENDIX K: Draft EIR Comment Letter Submittals (Continued)**

---

**LIST OF FIGURES**

---

<b><u>Figure</u></b>	<b><u>Page</u></b>
1 Proposed Project Components .....	4
2 Regional Location Map .....	8
3 Community Location Map.....	9
4 Aerial Photograph of the Site Location.....	10
5 Former Playa Vista Master Plan Area .....	13



---

**LIST OF TABLES**

---

<b><u>Table</u></b>	<b><u>Page</u></b>
1 Comparison of Impacts of Alternatives to the Proposed Project.....	25
2 Quantitative Comparison of the Alternatives to the Proposed Project .....	29
3 Village at Playa Vista Draft Mitigation Subphasing Plan.....	99
4 Written Comments Summary .....	508

---

## INDEX OF DRAFT EIR COMMENTORS

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
		<b>City of Los Angeles</b>
2	1	City of Los Angeles, Department of Public Works, Bureau of Engineering
2	2	City of Los Angeles, Department of Public Works, Bureau of Sanitation, Watershed Protection Division
2	3	City of Los Angeles, Department of Recreation and Parks
2	4	City of Los Angeles, Department of Water and Power
2		<b>City of Los Angeles Neighborhood Councils</b>
2	5	Del Rey Neighborhood Council and Del Rey Homeowners and Neighbors Association
2	6	Grassroots Venice Neighborhood Council
2	7	Mar Vista Community Council
		<b>Federal</b>
2	8	Department of the Army, Los Angeles District, Corps of Engineers
		<b>State</b>
2	9	California Coastal Commission, South Coast Area Office
2	10	California Department of Conservation, Division of Oil, Gas & Geothermal Resources
2	11	California Department of Fish and Game
2	12	California Department of Toxic Substances Control
2	13	California Department of Transportation, District 7, Regional Planning, IGR/CEQA Branch
2	14	California Native American Heritage Commission
2	15	California Regional Water Quality Control Board, Los Angeles Region
2	16	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
		<b>Regional</b>
2	17	Los Angeles Unified School District, Office of Environmental Health and Safety
2	18	South Coast Air Quality Management District, CEQA Section
2	19	Southern California Association of Governments
		<b>Jurisdictional</b>
2	20	City of Culver City
2	21	City of Manhattan Beach

---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
2	22	City of Santa Monica
2	23	County of Orange Planning & Development Services Department
2	24	Los Angeles County Department of Public Works
2	25	Los Angeles County Department of Regional Planning
2	26	Los Angeles County Fire Department
2	27	Los Angeles County Public Library
2	28	Los Angeles County Sheriff's Department
		<b>Organizations</b>
2	29	Airport Marina Counseling Service
2	30	Ballona Wetlands Trust
2	31	Del Rey Homeowners and Neighbors Association
2	32	Friends of Ballona Wetlands
2	33	Friends of the South Bay Bicycle Path
2	34	Friends of Sunset Park
3	35	Grassroots Coalition/Friends of the Children
3	36	Heal the Bay
3	37	KOREH L.A.
3	38	Los Angeles County Bicycle Coalition
3	39	National Resources Defense Council
3	40	Sempre Energy Utilities
3	41	Sierra Club
3	42	Spirit of the Sage Council
3	43	Wetlands Action Network
		<b>Individuals</b>
3	44	Ade Adeniji
3	45	Tina Aldatz
3	46	Juan Alvarado
3	47	Tammy Andrews
3	48	Mike Arias
3	49	Gayle Avant
3	50	Terry Ballentine
3	51	Diane Barretti
3	52	Robert E. Bates
3	53	Michael R. Bauer

---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
3	54	Carol V. Beck
3	55	Dr. Suzanne De Benedittis
3	56	William E. A. Berger
3	57	Karen & Mark Binder
3	58	Juliet Bobak
3	59	Scott Bouton
3	60	Terry Braverman
3	61	Jane Bright
3	62	Ciara Broderick
3	63	Dennis M. Bryan
3	64	Bruce and Barbara Burns
3	65	Bruce Campbell
3	66	Cathy Carey
3	67	David Chiappetta
3	68	Uncle Darrow's, Inc.
3	69	Mike and Debbie Clint
3	70	Jonathan Coffin
3	71	Karen Comegys
3	72	Terry Conner
3	73	Danna Cope
3	74	Mary Lou Crockett
3	75	Karen Cross
3	76	Mrs. Shawn Crum
3	77	Marcelo Cruz, President
3	78	Christina Davis
3	79	Mary Davis
3	80	Don Dearborn
3	81	Steve Donell
3	82	Donna Downing
3	83	Richard W. Eames
3	84	Kenneth Egan
3	85	Barbara Eisenberg
3	86	Chris Ellison
3	87	Helfried Fahrenholz

---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
3	88	Diane Fecho
3	89	William R. Fecho
3	90	James L. Ferro
3	91	George Festa
3	92	fiteco@aol.com
3	93	Annette L. Fletcher
3	94	D. Forrest
3	95	Lisa and Randy Freeman
3	96	Sandra Garber
3	97	Dorothy Garven
3	98	Aimee Gates
3	99	Dorraine Gilbert
3	100	Barry Gribbon
3	101	Jennifer Gribbon
3	102	Howard Hackett
3	103	Susana Halpine
3	104	Ann Henrichs
3	105	David A. Herbst
3	106	Lloyd G. Hild
3	107	James Hill
3	108	Ellie Holm
3	109	Eleanor Holm
3	110	Gunnar J. Holm
3	111	Carole Hossan
3	112	Agnes Huff
3	113	Sarah Hughes
3	114	Michel Ingham
3	115	Julie Inouye
3	116	Nancee Inouye
3	117	Philip Jamtaas
3	118	Ryan Jamrog
3	119	Carol Kapp
3	120	Kevin Katz
3	121	Yates A. Keir

---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
3	122	Dr. Robert Kilroy
3	123	Bev Klocki
3	124	Celia Knight
3	125	Stephen Knight
3	126	Robert A. Krauch
3	127	Myra Kriwanek
3	128	Jim Lamm
3	129	Angela Lee
3	130	Hyun Gwon Lee
3	131	Sue Levitt
3	132	Lance Lipscomb
3	133	Jocelyn and David Lutzky
3	134	N. Challis Macpherson
3	135	Jayne Major
3	136	Glenn Marzano
3	137	Sylvester Matthews
3	138	Jeffrey McLean
3	139	Sandy Medrano
3	140	Irene Meltzer
3	141	Cheryl Mitchell
3	142	Ross Moen
3	143	John Monaghan
3	144	Faridah Monghate
3	145	Jeanne Moody
3	146	Christopher Moore
3	147	Dana Morgan
3	148	Ingrid Mueller
3	149	Laura Munsterteiger
3	150	Richard S. Musella
3	151	Richard Nickey
3	152	Guy Nicolet
3	153	John W. Nugent
3	154	Patrick O'Neill
3	155	Mark A. Ozzello

---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
3	156	Phil Parlett
3	157	Richard S. Payne
3	158	Terence Pearce
3	159	Alicia M. Perez
3	160	Perryman
3	161	Shannon C. Phillips
3	162	Linda Piera-Avila
3	163	Elizabeth A. Pollock
3	164	Bill Pope
3	165	Praad Geotechnical, Inc.
3	166	Leslie Purcell
3	167	Joe Ravetz
3	168	Mollie Reeves
3	169	Michael A. Reifel
3	170	John Reynolds
3	171	Mary Ballou Richert
3	172	Riggs Place Neighbors
3	173	Ernest Roberts
3	174	Eva Roberts
3	175	Phil Roberts
3	176	Walter Roessner
3	177	Michael & Kathleen Rogers
3	178	Sara D. Roos
3	179	Lee & Marie Roozen and family
3	180	Nancy Ruben
3	181	Bonnie Sachs, ASID • CID
3	182	Caroline R. Salter
3	183	Alex Schub
3	184	Roberta Sergant
3	185	Linda Shafritz
3	186	Diane Shapiro
3	187	Stephen E. Shepherd
3	188	John Sheppard
3	189	Mickey Shockley

---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
3	190	James R. Smith
3	191	Mary Smith
3	192	Richard Stall, Jr.
3	193	Richard Standke
3	194	Shelly Stelzer
3	195	Richard and Pat Sterner
3	196	Russell Stone
3	197	Isabel Storey
3	198	Glenn Stronks
3	199	Nancy Swaim
3	200	Greg Sweel
3	201	Marcy Szarama
3	202	Wei Shoong Teh
3	203	Arnold Tena
3	204	Boise E. Thomas
3	205	Mona and Kenneth Tilden
3	206	Jack Topal
3	207	Lawrence and Margaret Toy
3	208	Joseph Treves
3	209	Roberta Trousdale
3	210	John & Shirley Tweten
3	211	John Jay Ulloth
3	212	J. Michael Uszler, M.D.
3	213	Marshall E. Uzzle
3	214	Dan and Nancy Valenzuela
3	215	Tim Vargas
3	216	Martha Villalobos
3	217	Leila Visram
3	218	Seema Visram
3	219	Jeanette Vosburg
3	220	David C. Voss, Jr.
3	221	Gwen Vuchsas
3	222	Daniel Walker
3	223	Robert Weldon



---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

<b>Volume</b>	<b>Letter</b>	<b>Commentor</b>
3	224	Dawn Wendl
3	225	Greg Wenger
3	226	Marvin West
3	227	William West
3	228	Denis Will
3	229	Cindy Williams
3	230	William J. Wolitarsky
3	231	Danny Wong
3	232	K. Wong
3	233	Lew Wright, Sr.
3	234	Nicole Xanten



---

**INDEX OF DRAFT EIR COMMENTORS (CONTINUED)**

---

---

## **I. EXECUTIVE SUMMARY**

### **A. INTRODUCTION**

---

This Final EIR has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA) for the proposed Village at Playa Vista Project (“the Proposed Project” or “The Project”).

The City of Los Angeles, which has the principal responsibility for approving the Proposed Project, is the Lead Agency pursuant to CEQA, Public Resources Code Section 21067. As the Lead Agency, the City is responsible for the preparation and distribution of this Final EIR. This Final EIR identifies possible significant effects that the Proposed Project may have on the environment. It also indicates the manner in which the Project's significant effects can be reduced or avoided through the implementation of mitigation measures. Impacts that cannot be mitigated to a level below significance are considered significant unavoidable adverse impacts. For projects that result in any unmitigated or under-mitigated significant environmental effects, the City may, after making a series of findings, certify the EIR upon adoption of a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

The Draft EIR was circulated for a 60-day public review period beginning on August 21, 2003 and ending on October 21, 2003. On September 18, 2003, the Los Angeles Department of City Planning extended the review period an additional 60 days, ending on December 22, 2003. During the 120-day review period for the Draft EIR, 234 written comment letters were submitted from interested parties.

As described in Section 15089 and 15132 of the CEQA Guidelines, the lead agency must prepare a final EIR before approving the project. The purpose of a final EIR is to provide an opportunity for the lead agency to respond to the public and commenting agencies. Therefore, this Final EIR focuses on responses of the Lead Agency to significant environmental points raised in the review and consultation process pursuant to CEQA Guidelines Section 15132. Pursuant to CEQA, this Final EIR includes a revised executive summary, corrections to the Draft EIR by environmental topic, a list of persons, organizations and public agencies commenting on the Draft EIR, responses to comments, a Mitigation Monitoring and Reporting Program, additional appendices, and references.

This Final EIR is organized into seven sections that provide a summary of the EIR and add new materials that have been added to the Draft EIR. The seven sections and their contents are as follows:

- I. Executive Summary.** This section provides an overview of the Project and its impacts. The section provides background regarding the EIR and the Proposed Project (including location, history, and development characteristics) as well as a comprehensive summary of the Proposed Project impacts prior to mitigation, proposed mitigation measures and net impacts after mitigation. It also provides a summary of the cumulative impacts (impacts of the Proposed Project in combination with other development), and the analysis of alternatives to the Proposed Project.
- II. Corrections and Additions.** This section provides a list of edits that were made to the Draft EIR, based on comments received from the public, and other items requiring updating and/or corrections. This section is subdivided into subsections that correspond to the section heading in the Draft EIR and address the following: Project Description, Environmental Impact Analysis (including each environmental topic discussed in the Draft EIR), Growth-Inducing Impacts, Significant Irreversible Impacts, Alternatives, Organizations and Persons Contacted, List of Acronyms, References, and Appendices.
- III. Mitigation Monitoring and Reporting Program (MMRP).** This section provides the full MMRP for the Proposed Project. The MMRP is the document that is used by the enforcement and monitoring agencies responsible for the implementation of the Proposed Project's mitigation measures. The MMRP lists all of the Proposed Project's mitigation measures, by environmental topic, and identifies for each of the measures, the enforcement agency, the monitoring agency, the monitoring phase, the monitoring frequency, and the action indicating compliance with the mitigation measures.
- IV. References.** This section lists items added to the Reference List, which is available for review at the City of Los Angeles Planning Department, 200 North Spring Street, Room 720, Los Angeles, CA 90012.
- V. Appendices.** This section lists additional appendices that have been incorporated into the Final EIR.
- VI. Topical Responses to Comments.** This section provides responses that were provided to comments received during the public review period that lend themselves to general response.
- VII. Responses to Written Comments.** This section presents a table that lists all of the parties that commented on the Draft EIR during the 120-day public review period, and the issues that were addressed in their letters. The table is followed by the comments presented in each of the letters, with the City of Los Angeles' responses to each comment.

---

**I. EXECUTIVE SUMMARY**  
**B. THE PROPOSED PROJECT**

---

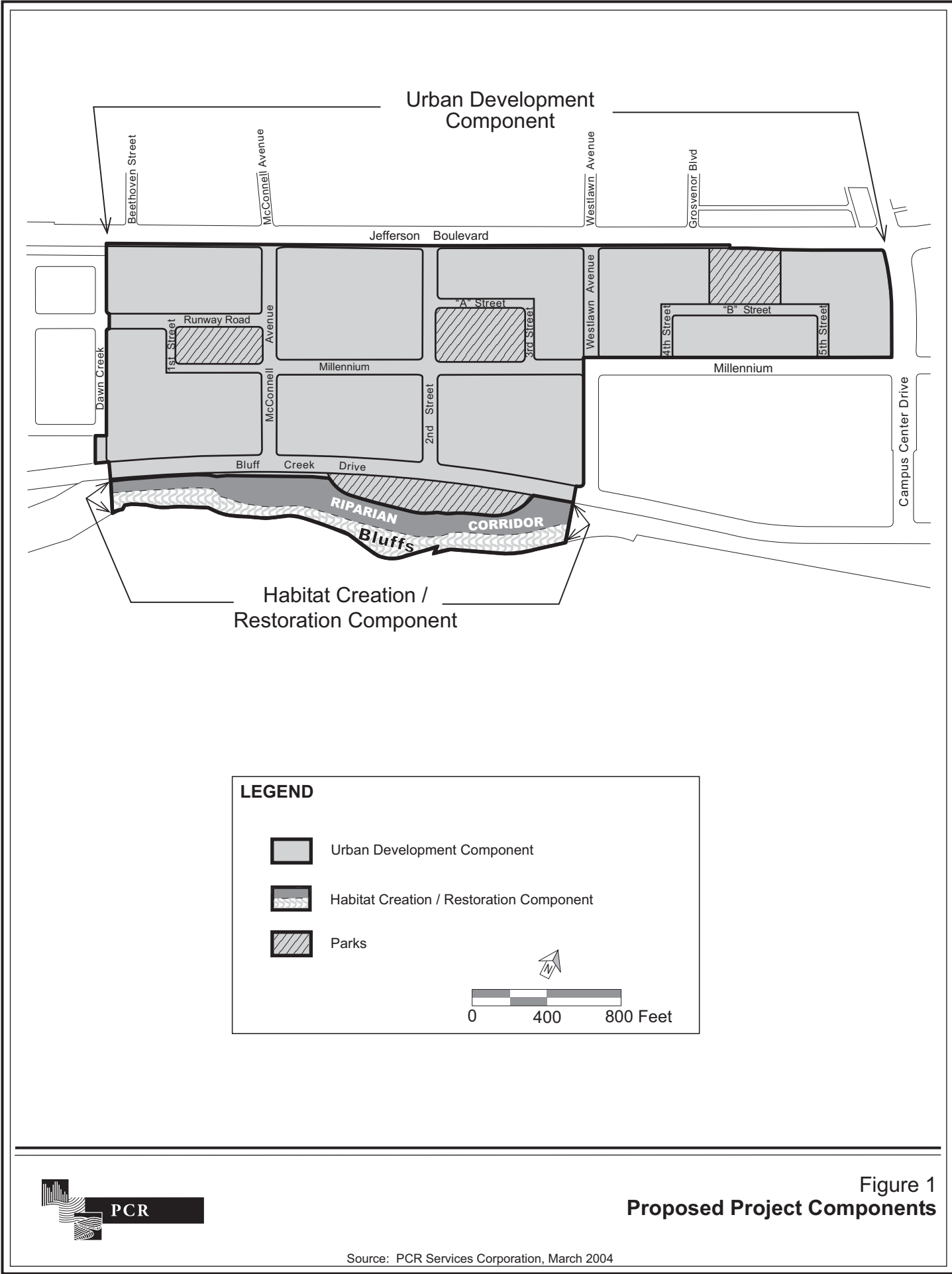
**1.0 PROJECT CHARACTERISTICS**

The Village at Playa Vista is located on a 111.0-acre site in the Playa Vista area of West Los Angeles and consists of the following two components: (1) a mixed-use community (“the Urban Development Component”); and (2) a Riparian Corridor and restoration and maintenance of a portion of the Westchester Bluffs adjacent to the Riparian Corridor (the “Habitat Creation/Restoration Component”). See Figure 1 on page 4. As described more fully in Section I.D., the Proposed Project greatly reduces the scale of development in comparison to previous proposals within the larger area known as Playa Vista.

The primary component of the Project, the Urban Development Component would enable the development of a master planned community composed of residential, commercial, recreational, and community-serving uses. This development would occur on an approximately 99.3-acre site consisting of 87.5 acres of development, 11.4 acres of parks, and 0.4 acre of other passive open space. The proposed development includes 2,600 dwelling units, 175,000 square feet (sq.ft.) of office space, 150,000 sq.ft. of retail space, and 40,000 sq.ft. of community-serving uses. The Urban Development Component also would provide a comprehensive program of parks and open space areas that would contribute to the aesthetic character of the area and complement the land use program described above.

This development program may be amended under the provisions of an Equivalency Program. The Equivalency Program allows a limited exchange of office uses for retail and/or assisted living uses in order to meet future needs, within the framework of a balanced Project consistent with the Project’s mixed-use concept. Under the proposed Equivalency Program, a maximum of 125,000 sq.ft. of office development may be exchanged for up to 56,832 sq.ft. of retail uses or up to 200 assisted living units, or a combination thereof (e.g., an increase of both retail and assisted living development). Land uses may be exchanged based on specific equivalency factors and subject to the limits set forth above.




The Habitat Creation/Restoration Component includes a total of 11.7 acres, of which the Riparian Corridor involves approximately 6.7 acres, with the restoration of the adjoining portion of the Westchester Bluffs occurring over the remaining 5 acres. Implementation of the Riparian Corridor would include excavation of the corridor, planting with native vegetation, monitoring and maintenance to meet performance standards, and corrective action as necessary. The construction of the Riparian Corridor would complete a 25-acre riparian corridor that also



Urban Development Component

Habitat Creation / Restoration Component

LEGEND

-  Urban Development Component
-  Habitat Creation / Restoration Component
-  Parks

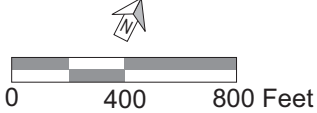


Figure 1  
Proposed Project Components

Source: PCR Services Corporation, March 2004

includes sections east and west of the Riparian Corridor, ultimately feeding into the Playa Vista First Phase Freshwater Marsh. The proposed Bluffs restoration program would enhance the bluffs adjacent to the Riparian Corridor as a coastal sage scrub community with increased habitat value. Once the Bluffs have been restored, the Proposed Project would be responsible for, an ongoing maintenance program that would include the removal of non-native plant species and the replacement of dead native plant specimens with new native plants.

## **2.0 DISCRETIONARY ACTIONS REQUESTED AND PERMITS REQUIRED**

Development of the Project site is governed by the Playa Vista Area D Specific Plan (City of Los Angeles Ordinance No. 160,523) and the Westchester-Playa Del Rey Community Plan.

Implementation of the Project as proposed requires a General Plan amendment to amend the Westchester/Playa del Rey Community Plan. In addition, the Applicant is requesting amendments to the existing Area D Specific Plan which would modify the land uses and densities currently allowed by this Plan. Amendments to the Plans and other actions to permit the proposed development would include, but may not be limited to, the following:

- Amendment of the General Plan to amend the Westchester/Playa del Rey Community Plan, to revise the General Plan Land Use designations and corresponding map designations within the portion of the Area D Specific Plan within which the Project is located from Light/Limited Industry and High/Medium Density Residential to Community Commercial and High/Medium Density Residential.
- Amendments to the Playa Vista Area D Specific Plan to adjust the zone boundaries and designations within the Proposed Project site, adjust the land use entitlement allowed in the Area D Specific Plan, consistent with the Proposed Project and previous Playa Vista First Phase Project approvals (VTTM 49104 and TTM 52092), and other procedures necessary to implement the Proposed Project.

In addition, the following actions and approvals may be requested to implement the proposed development:

- Approval of a Tract Map for the Village at Playa Vista by the City;
- In conjunction with the approval of the Village Tract Map, adoption of Conditions of Approval, including the Project's proposed design guidelines;
- Inclusion within the Village Tract Map of a resubdivision of Lot 113 of VTTM 49104 (a portion of the previously approved Playa Vista First Phase Project). The City's



---

Deputy Advisory Agency would be requested to make a determination in conjunction with its approval of the subdivision that Lot 113 of VTTM 49104 is not needed to meet the open space requirements of VTTM 49104;

- Approval of a Development Agreement with the City of Los Angeles;
- Approval of CUPs for alcohol sales (on- and off-site), community-serving uses, and other uses that require conditional use permits by the City;
- Approval by the City of grading permits, building permits, and other permits issued by the Department of Building and Safety associated with the development of the Proposed Project; any necessary public works permits for infrastructure improvements for development associated with the Project; Project mitigation measures; and other permits reasonably necessary for the implementation of the Project;
- Plot plan/site plan approvals by the City for development within the Proposed Project area;
- Approval of a National Pollutant Discharge Elimination System (NPDES) construction permit for development in the Proposed Project area by the RWQCB;
- Other actions from local, regional, state, and federal agencies, as may be required to implement the Proposed Project and its mitigation measures. These may include, but are not limited to the following: creation of service or special districts (e.g., Mello-Roos), financing actions, off-site infrastructure improvements and implementation agreements, and/or approvals, permits, and licenses from regulatory agencies associated with Project construction and post-construction operations, including, but not limited to, soil and groundwater remediation, stationary source air emissions, and repair, replacement and maintenance of on- and off-site infrastructure. Agencies may include the California Department of Fish and Game, Caltrans, the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, California Department of Toxic Substances Control, SCAQMD, SWQCB/RWQCB, ARB, the Cultural Affairs Commission, the Cultural Heritage Commission, the Native American Heritage Commission, and other local, regional, state, or federal agencies having jurisdiction over the Proposed Project or its mitigation measures.

---

## **I. EXECUTIVE SUMMARY**

### **C. PROJECT LOCATION**

---

The Village at Playa Vista is comprised of 111.0 acres located within the Westside area of the City of Los Angeles, approximately two miles inland from Santa Monica Bay (see Figure 2 on page 8, Figure 3 on page 9, and Figure 4 on page 10). The Proposed Project site is generally bounded by the adjacent Playa Vista First Phase Project to the east and west, Jefferson Boulevard to the north, and the Westchester Bluffs to the south.

In a larger context, the Proposed Project is surrounded by the existing City of Los Angeles communities of Westchester on the south, Del Rey to the northeast, Venice/Mar Vista further to the north and Playa del Rey further to the west. The Los Angeles County community of Marina del Rey lies further to the northwest, and the City of Culver City further to the east.

The topography of the Proposed Project site is basically flat and low-lying, ranging from approximately 7-24 feet above mean sea level. The southern portion of the site is bordered by the Westchester Bluffs that rise approximately 120 feet above the Project Site.

The flat-lying area that is slated for mixed-use development, is vacant except for two former Hughes Aircraft Company/McConnell Douglas Helicopter plant site buildings, with remnants of past manufacturing and airstrip uses. Building 22 is a warehouse used for storage and Building 45 is used occasionally for filming and other activities. Other small buildings, such as shed, minor storage structures, and construction trailers associated with development of the adjacent Playa Vista First Phase Project also exist in the former Salvage Yard area of the Proposed Project site.

The Proposed Project site is currently used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, including stockpiling excavated soils, temporary stormwater detention, rock crushing and stockpiling, and equipment staging and parking. A roadway that bisects the Proposed Project site (Runway Road) is also under construction as part of the adjacent Playa Vista First Phase Project, to connect the east and west ends of the Playa Vista First Phase Project site.

Land immediately to the west and east of the Proposed Project site is approved for development as part of the Playa Vista First Phase Project, with construction already underway approximately ¼ mile to the west of the Proposed Project site and extending to Lincoln Boulevard. The vacant land adjacent to the Proposed Project site contains support activities for the current First Phase development and preparation for future development. When construction

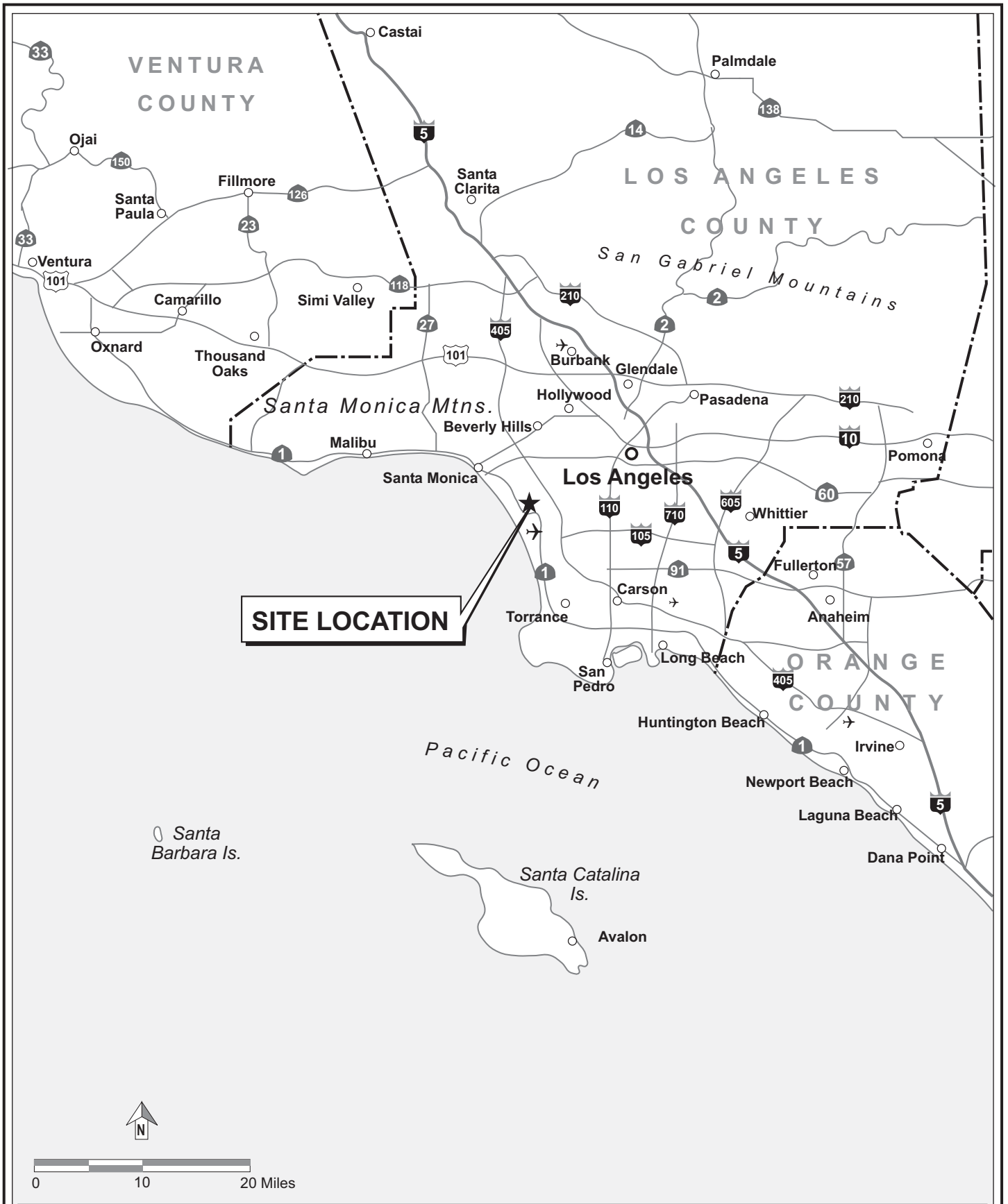


Figure 2  
Regional Location Map

Source: PCR Services Corporation, July 2003



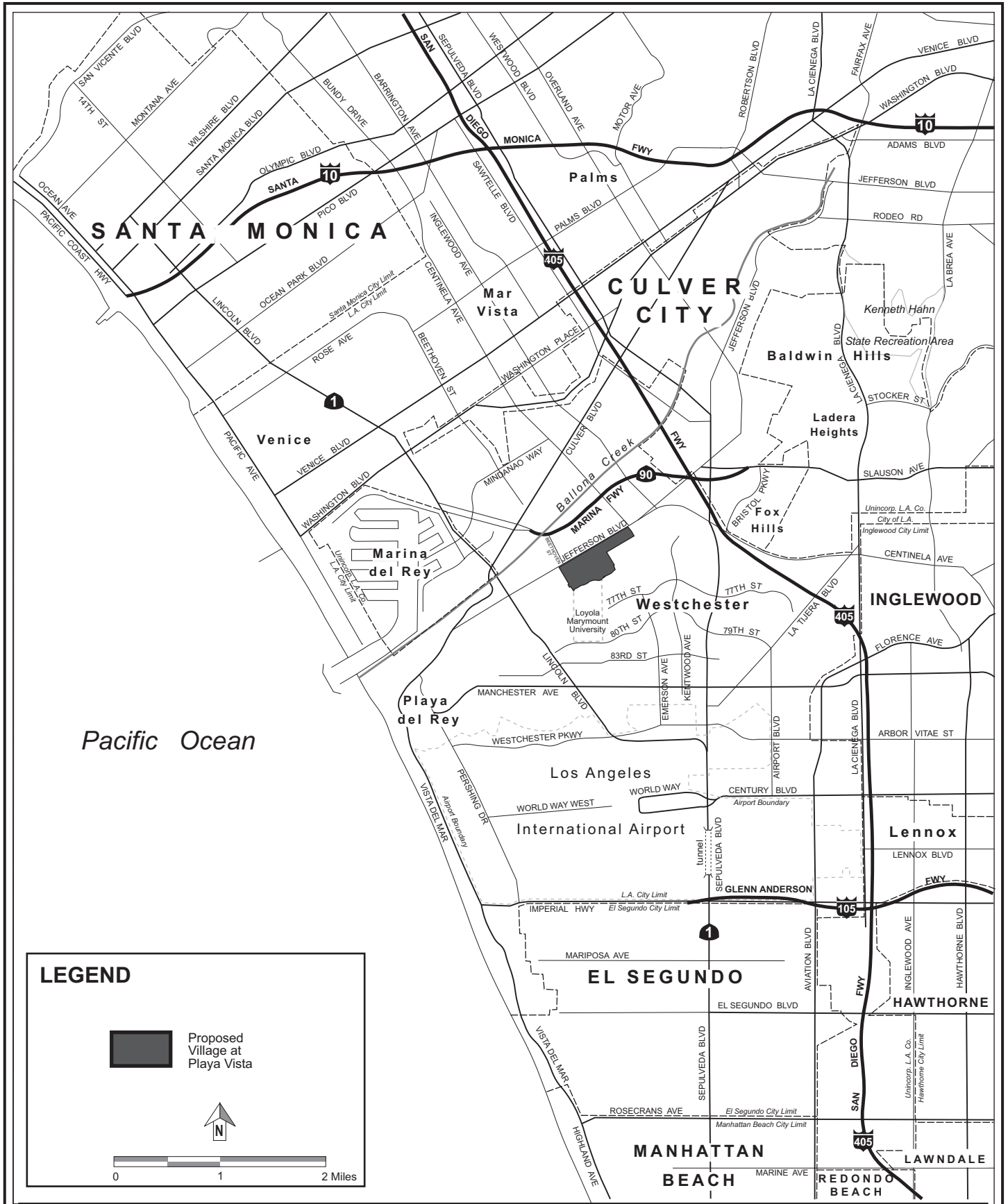


Figure 3  
Community Location Map

Source: PCR Services Corporation, July 2003





Proposed Village at Playa Vista →

Source: Playa Capital Company, July 2003

Figure 4  
Aerial Photograph  
of the Site Location

is completed, the land adjacent to the west of the Proposed Project site will include predominantly residential uses, with some mixed uses, in mid-rise buildings. Buildings will range from two to six stories.

Land immediately to the east of the Proposed Project site is approved for office and commercial uses, including entertainment, media and technology uses. The land is currently vacant in some locations, and developed with former plant site buildings in other locations. Eleven former plant site buildings remain within the Playa Vista First Phase Project site, which are to be preserved as components of the Hughes Industrial Historic District.

Land uses along the northern boundary of the Proposed Project site include mixed office/commercial/apartment uses across the street from the site. Land atop the Westchester Bluffs to the south of the Project Site includes Loyola Marymount University and the Westchester community.

The Proposed Project site is located within the boundaries of the Westchester-Playa del Rey Community Plan and the Playa Vista Area D Specific Plan. The Plan designations are for Light/Limited Industrial (M (PV) zone) and High Medium Density Residential (R4(PV) zone) uses. Portions of the Bluffs along the southern edge of the site are for Public/Quasi-Public ([Q] R4-1 zone) and Low Density Residential (R-1- zone) uses.

---

**I. EXECUTIVE SUMMARY**  
**D. PROJECT BACKGROUND**

---

**1.0 HISTORY**

The Proposed Project reflects an approach to development that has evolved over the past two decades. The Project site is part of a larger area known as Playa Vista. Historically, the Playa Vista property has included land on both sides of Lincoln Boulevard and north and south of the Ballona Channel. The site was divided into four quadrants known as Area A, Area B, Area C, and Area D (see Figure 5 on page 13). The Proposed Project is located in Area D, which was annexed into the City of Los Angeles in 1986, concurrent with the adoption of the Area D Specific Plan.

During 1991 to 1993, the City of Los Angeles and the California Coastal Commission approved the development of the adjacent Playa Vista First Phase Project over a portion of Area D and Area B. The United States Army Corps of Engineers (USACE), also during this period, issued a permit (USACE Permit No. 90-426-EV), pursuant to Section 404 of the Federal Clean Water Act, to allow, among other things, the filling of isolated wetlands in areas that included parts of Area B and Area D, including the Project site.

In 1995, the City approved a revision to the First Phase Playa Vista Project to permit the development of an Entertainment, Media and Technology District at the east end of the Area D property, and approved the redevelopment of the former McDonnell Douglas and Howard Hughes plant site located at the eastern end of Area D.

Also in 1995, the City circulated a Notice of Preparation (NOP) for a Project EIR that included the remainder of the former Playa Vista property, exclusive of the First Phase Project (EIS/EIR 95-0086, State Clearinghouse No. 1995051011) and the Army Corp of Engineers issued a Notice of Intent to prepare an Environmental Impact Statement (EIS). The Notice of Preparation included Area A, Area C and portions of Area B and Area D not included in the First Phase Project. This joint EIS/EIR, which was never circulated, was intended to address the development of the former Playa Vista Planning Areas, exclusive of the First Phase Project.

On December 19, 2003, the California Wildlife Conservation Board acquired all of Area A and portions of Area B for long-term open space/recreation uses. Also, the Applicant, while retaining rights to complete certain roadway improvements to Area C, is no longer under any obligation to plan and entitle Area C for the benefit of the State of California and Area C has been excluded from the Playa Vista Planning Area.

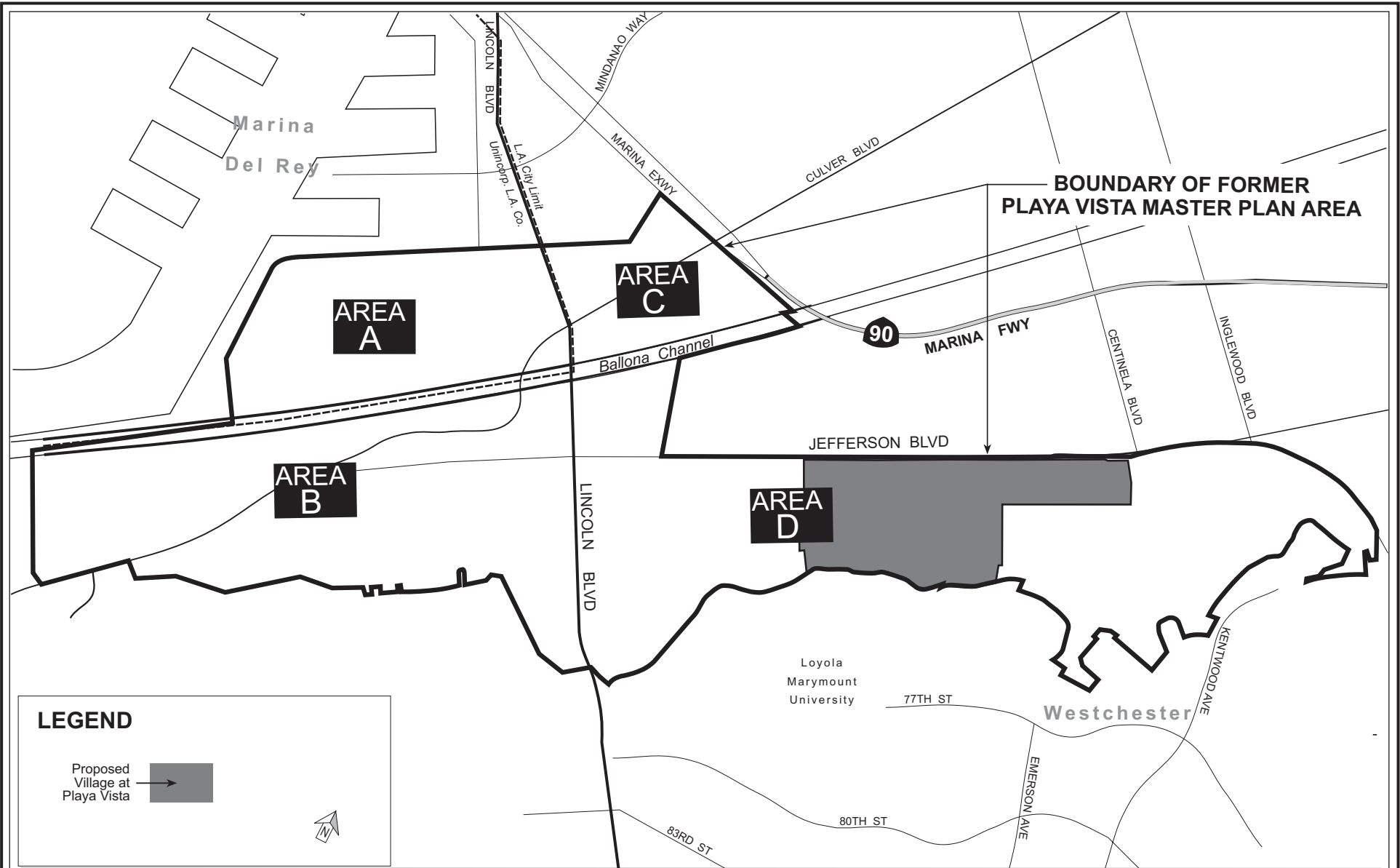


Figure 5  
Former Playa Vista Master Plan Area



Source: PCR Services Corporation, March 2004



On November 14, 2002, an NOP was circulated by the City for the currently proposed Village at Playa Vista Project, located within the central portion of Area D, between the western and eastern portions of the adjacent Playa Vista First Phase Project.

Since issuance of the NOP in November 2002, and in response to NOP comments, the Proposed Project was reduced in size to exclude a portion of the Westchester Bluffs adjoining the eastern portion of the First Phase Playa Vista Project, located southeast of the currently defined Project.

## **2.0 DETERMINATION FOR THE EIR AND NOP**

The Applicant submitted an Environmental Assessment Form (EAF) for the Proposed Project in October 2002. After review of the information provided, the City Planning Department determined that the Proposed Project could have a significant impact on the environment. On October 30, 2002 the Planning Department issued a determination that an Environmental Impact Report should be prepared. The City identified the following topics to be included: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology/Soils, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use/Planning, Noise, Population/Housing, Public Services, Recreation, Transportation/Traffic, Utilities/Service Systems and Mandatory Findings of Significance.

On November 14, 2002, a Notice of Preparation (NOP) and a Notice of Public Scoping Meeting was circulated for a 60-day review period starting on November 14, 2003, and ending on January 14, 2003. The public scoping meeting was held on December 12, 2002. Written and oral comments were taken at the scoping meeting and letters were submitted from interested parties. The NOP is contained in Appendix A of the Draft EIR; written and oral comments received are contained in Draft EIR Appendix B.

On August 21, 2003, the Draft EIR was circulated for a 60-day review period, initially ending on October 21, 2003. On September 18, 2003, the Los Angeles Department of City Planning extended the review period an additional 60 days, ending on December 22, 2003. During the 120-day review period for the Draft EIR, 234 written comment letters were submitted from interested parties. Where appropriate, the following summary has been revised to reflect specific comments received which required correction and additions to the Draft EIR.

---

**I. EXECUTIVE SUMMARY**  
**E. AREAS OF CONTROVERSY**

---

Concerns raised in response to the project's NOP suggested that the EIR should include analyses in the EIR of issues in the same general categories as determined by the City Planning Department. The more notable concerns raised included soil gas and seismic safety, traffic, and issues pertaining to impacts on the Freshwater Wetland System, the Ballona Wetlands, and the Ballona Channel. A number of comments addressed concerns regarding Project impacts on biological resources from development effects on habitat, and visual quality of the environment, as to how the Project would affect the visual character of the area and views to and from the Westchester Bluffs. Other concerns were raised pertaining to impacts for grading; potential geologic hazards and risks related to future habitation of the site; increased air emission and noise associated with Project-generated traffic and construction activities; effects from changes in land use and compliance with all relevant local and regional plans, and regulation; potential presence of vectors on the Project site, jobs-housing balance; provision of adequate public transit service and bikeways; project impacts on energy and water conservation; potential effect on the provision of services and utilities that would arise from new population growth. Many concerns were raised regarding cumulative effects of development that would occur with the Proposed Project and other development in the area. Many comments addressed the need to identify appropriate mitigation measures for the Proposed Project.

Concerns raised in comments submitted in review of the Draft EIR suggested that the Final EIR should include additional or expanded analyses of issues in the same general categories presented in the Draft EIR. As with the NOP, the more notable concerns raised included soil gas issues and seismic safety, traffic, and issues pertaining to impacts on the Freshwater Wetland System, the Ballona Wetlands, the Ballona Channel, and Santa Monica Bay. Several concerns were raised regarding impacts related to the previously approved Playa Vista First Phase Project. Other comments received addressed concerns regarding Project impacts on biological resources, and visual quality of the environment, as to how the Project would affect the visual character of the area and views to and from the Westchester Bluffs. Other concerns were raised pertaining to impacts related to potential geologic hazards and risks related to future habitation of the site; increased air emission and noise associated with Project-generated traffic and construction activities; effects from changes in land use and compliance with all relevant local and regional plans, and regulation; potential presence of vectors on the Project site; jobs-housing balance; provision of adequate public transit service and bikeways; project impacts on energy and water conservation; potential effect on the provision of services and utilities that would arise from new population growth. Many concerns were raised regarding cumulative effects of development that would occur with the Proposed Project and other development in the

area. Many comments addressed the need to identify appropriate mitigation measures for the Proposed Project.

---

## **I. EXECUTIVE SUMMARY**

### **F. ALTERNATIVES**

---

Seven alternative project scenarios have been developed and analyzed to compare the relative impacts of a range of alternatives to the Proposed Project. The analysis of alternatives starts with the “No Project” Alternative. CEQA Guidelines Section 15126.6(e)(3) sets forth two options for discussing the No Project Alternative. The two options are to define the No Project Alternative in terms of no changes to existing on-site conditions (“no build”), or development of the site under existing land use regulations without approval of the Proposed Project. In order to fully address all applicable CEQA requirements, the first two alternatives analyzed in this Draft EIR are both No Project Alternatives that reflect these two options. Specifically, the first alternative analyzed is one in which no development would occur. The second alternative analyzed is one in which development would occur pursuant to existing land use regulations and without amendments to the Area D Specific Plan, or existing zoning. Based on comparative evaluations, estimations were made as to the environmental impacts of each alternative in contrast with those of the Proposed Project and whether each alternative could attain the Applicant’s Project objectives. The seven alternatives and the conclusions reached regarding their comparative impacts after mitigation (except for traffic impacts, which are prior to mitigation) follow.

#### **Alternative 1: No Project – No Development**

This alternative would produce no change to the existing physical condition and use of the Project site. Existing uses would continue.

#### **Summary of Comparative Impacts**

The No Project Alternative would eliminate significant impacts that would occur with the Proposed Project, including: regional air quality, construction noise, traffic, visual qualities, police services, and solid waste disposal. The No Project Alternative would also result in the avoidance of all adverse, non-significant impacts anticipated to occur with the development of the Proposed Project, including: operational, noise, earth (seismic hazards), local air pollution, and other services.

Conversely, the No Project Alternative eliminates net beneficial effects that would occur with the Proposed Project, including: bluff restoration and biotic resources, jobs/housing balance, housing, job creation, bicycle circulation, and parks and recreation facilities.

Since the Proposed Project is not a government project (which, by nature, responds to a public health or safety need), the No Project Alternative would produce no adverse environmental impacts, except by omission of improvements associated with the Proposed Project. In other words, the Proposed Project's design would result in implementation and completion of privately funded remediation of existing public safety concerns in the area (i.e., localized flooding, bluff stability, and surface and ground water pollution), which would not be implemented under the No Project Alternative.

### **Relationship of this Alternative to Project Objectives**

The No Project – No Development Alternative would not attain any of the Applicant's basic Project objectives for the Proposed Project. It would not provide a mixed-use community that promotes internally supportive uses that decrease dependency on the automobile with resultant traffic, air quality and noise benefits, nor create greater efficiencies in the utilization of infrastructure. This alternative would also not generate jobs, housing, and recreational activities of a substantial scale and magnitude. Furthermore, this alternative would not contribute to the supply of market housing at a wide range of prices and help fulfill the City's need for housing Citywide and in the Westside, in particular. This alternative would not implement the proposed programs for resource protection, enhancement, conservation, and reuse.

### **Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning**

This alternative would allow development that could occur without any amendments to the existing specific plan. Under this alternative, development would be limited to approximately 108,050 square feet of office space (approximately 38% less than that included in the Proposed Project), but no residential, retail, or community-serving uses.

### **Summary of Comparative Impacts**

The No Project – Development Permitted by the Existing Specific Plan and Zoning Alternative would eliminate the Proposed Project's significant adverse impacts on Aesthetics and Views. The alternative would continue to generate significant impacts on traffic, regional air quality, construction noise, and solid waste disposal, although at reduced levels compared to the Proposed Project. Alternative 2 would also reduce the Proposed Project's non-significant impacts on local air quality and noise from operations, public services, biotic resources, safety/risk of upset, energy, and utilities. As with the Proposed Project, there would be no impacts on mineral or historic resources. There would be a 100% reduction in total housing capacity and an 82% reduction in employment. Therefore, this alternative would not provide housing and employment opportunities anticipated in the Specific Plan, and would exacerbate the imbalance in the jobs/housing ratio in the local and sub-regional areas.

---

### **Relationship of this Alternative to Project Objectives**

The No Project – Development Permitted by the Existing Specific Plan and Zoning Alternative would not attain any of the Applicant’s basic Project objectives for the Proposed Project. It would not provide a mixed-use community that promotes internally supportive uses that decrease dependency on the automobile with resultant traffic, air quality and noise benefits, nor create greater efficiencies in the utilization of infrastructure. This alternative would also not generate jobs, housing and recreational activities of a substantial scale and magnitude. Furthermore, this alternative would not contribute to the supply of market housing at a wide range of prices and help fulfill the City’s need for housing Citywide and in the Westside, in particular. This alternative would not implement the proposed programs for resource protection, enhancement, conservation, and reuse.

### **Alternative 3: Existing Specific Plan – Buildout**

This alternative would allow development of the Proposed Project site to the maximum land use entitlements permitted under the existing Area D Specific Plan. The development program for this alternative is based on the remaining uses which could occur beyond those that have been approved for development in the adjacent Playa Vista First Phase Project (VTTM 49104 and TTM 52092). However, to implement this alternative, changes and/or adjustments to the existing Specific Plan zoning boundaries would be required. In comparison to the Proposed Project, the existing plan allows for 905% more office space and 310% more retail uses; it includes a 600-room hotel component and no residential component.

### **Summary of Comparative Impacts**

The alternative would increase the degree of significant air quality, solid waste disposal, and traffic adverse impacts, as well as significant impacts associated with the obstruction of views, over that which would result from development of the Proposed Project. The alternative would also increase the Project’s adverse, but non-significant impacts, on grading, groundwater hydrology, surface water quality, electricity consumption, reclaimed water consumption, and wastewater generation. These increased impacts would still be less than significant. Beneficial impacts of the Proposed Project that would be diminished or that would not be realized include impacts to housing, jobs/housing balance, flood control, and bikeway improvements. It would reduce the Project’s non-significant impact on schools, libraries, energy and water consumption, and plants and animals from indirect sources. It would create more job opportunities. Overall, development of this alternative would produce a greater degree of environmental impacts than the Proposed Project.

---

### **Relationship of this Alternative to Project Objectives**

Without a housing component, this alternative would not meet the Project objectives of providing a mixed-use community promoting mutually supportive uses such as employment, housing and recreation. The lack of housing along with the greater amount of commercial activity and off-site orientation would result in a less internally oriented community, exacerbating jobs/housing imbalance. This would work against the intended decrease in dependency on the automobile with resultant traffic, air quality, and noise benefits. Furthermore, this alternative would not contribute to the supply of market housing at a wide range of prices and help fulfill the City's need for housing Citywide and in the Westside, in particular. The Applicant's resource protection, enhancement and conservation goal could be met with this alternative.

### **Alternative 4: Reduced Intensity – 25% Reduction**

This alternative would reduce the intensity of the Proposed Project development by reducing the amount of each of the developed uses, including office, retail, housing, community-serving and park space by 25%. It is assumed that development within the various use categories would occupy the same area of the Project site as the Proposed Project, only with reduced intensity.

### **Summary of Comparative Impacts**

The reduced intensity alternative would reduce but not eliminate the Proposed Project's significant adverse impacts on traffic, regional air quality, construction noise, police, and solid waste disposal. It would not eliminate the significant view impact along the short segment of Jefferson Boulevard adjacent to the Project site. Alternative 4 would also reduce the Proposed Project's non-significant impact levels on operational air quality and noise from operations, other public services (with less revenue generation), safety/risk of upset, earth resources (seismic hazards), energy, and utilities. There would be reductions in total housing capacity and employment. This alternative would be beneficial for the jobs/housing balance, but not to the same extent as the Proposed Project.

### **Relationship of this Alternative to Project Objectives**

This alternative would partially meet the objectives of the Proposed Project. It would be consistent with the objective of providing a mixed-use community that provides internally supportive uses, decreasing dependency on the automobile, and increasing efficiency in the utilization of infrastructure. The objective of generating jobs, housing, and recreational opportunities would be somewhat achieved, although this alternative would provide a less substantial contribution to this objective than the Proposed Project due to the lower density of the

alternative. This alternative would contribute to the supply of market housing and help fulfill the City's need for housing Citywide and in the Westside, in particular, but would do so at a level that is not as substantial in nature as with the Proposed Project. In addition, the reduction in units would inhibit the objective of providing housing within a wide price range. The Applicant's resource, protection and conservation goal could be met with this Alternative.

#### **Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office**

This alternative would reduce both the overall intensity of the Proposed Project and the types of uses permitted. Housing, park space and community-serving uses would still occur, but would be reduced by 25%. Retail and office uses would be eliminated. It is assumed that the development reductions would occur at specified locations, rather than across the board, allowing for additional open space within the Project site.

#### **Summary of Comparative Impacts**

This alternative would reduce but not eliminate the Proposed Project's significant adverse impacts on traffic, regional air quality, construction noise, police services and solid waste disposal. It would not eliminate the significant aesthetics/view impact along the segment of Jefferson Boulevard adjacent to the Project site. Alternative 5 would also reduce the Proposed Project non-significant impact levels on local air quality and noise, other public services, safety/risk of upset, earth resources (grading, dewatering/subsidence, and seismic hazards), energy, and utilities. There would be reductions in total housing capacity and employment. This alternative would be beneficial for the jobs/housing balance in the local area and region, but not to the same extent as the Proposed Project even though the on-site ratio would be better.

#### **Relationship of This Alternative to Project Objectives**

This alternative would partially address some of the basic objectives of the Proposed Project. This alternative would help to meet the supply of market housing and the City's need for housing Citywide and in the Westside, in particular, but would do so at a level that is not as substantial in nature as with the Proposed Project. In addition, the reduction in units would inhibit the objective of providing housing within a wide price range. Also, the Applicant's resource, protection and conservation goal would be met with this Alternative. The objective of generating housing would be somewhat achieved, although this alternative would provide a less substantial contribution to this objective than the Proposed Project due to the lower density of the alternative. The objective of generating a substantial number of jobs would not be addressed. This alternative would not be consistent with the objective of providing a mixed-use community that provides internally supportive uses, decreasing dependency on the automobile with resultant traffic, air quality, and noise benefits, and that creates greater efficiencies in the utilization of infrastructure.



---

### **Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office, or Community-Serving Uses**

This alternative would limit development to low-density, low-rise residential housing. The number of residential units would be reduced by 75%. It is assumed that development would occupy the same area as the Proposed Project, only varied by the type of housing provided.

#### **Summary of Comparative Impacts**

This alternative would reduce but not eliminate the Proposed Project's significant impacts on traffic, regional air quality, construction noise, police service and solid waste disposal. It would not eliminate the significant aesthetic/view impact along Jefferson Boulevard adjacent to the Project site. Alternative 6 would also reduce the Proposed Project's non-significant impact levels on local air quality and noise from operations, other public services (with less revenue generation), safety/risk of upset, earth resources (grading, dewatering/subsidence, and seismic hazards), energy, and utilities. There would be reductions in total housing capacity, and employment.

#### **Relationship of this Alternative to Project Objectives**

This alternative would not meet most of the Proposed Project's basic objectives. It would not provide a mixed-use community that promotes internally supportive uses that decrease dependency on the automobile with resultant traffic, air quality, and noise benefits, nor create greater efficiencies in the utilization of infrastructure. This alternative would also not generate jobs, housing, and recreational activities of a substantial scale and magnitude. Furthermore, this alternative while helping to meet the supply of market housing and City's need for housing Citywide and in the Westside, in particular, would do so at a level that is not substantial in nature as identified in the Project's basic objectives. In addition, the substantial reduction in units would preclude the objective of providing housing within a wide price range. Notwithstanding, the alternative would meet the Project's basic objective pertaining to resource protection and conservation.

### **Alternative 7: Designated Alternative Site**

Various sites were surveyed and considered as an alternative location for Proposed Project development to address the relative impacts that would occur if the development were located somewhere other than at the Proposed Project site. Of the candidate sites, one was selected for a comparative analysis of potential impacts. The site chosen for analysis was the Cal Compact site in the City of Carson.

---

### **Summary of Comparative Impacts**

Implementation of the Proposed Project at the Cal Compact site would result in a varied impact profile from the Playa Vista site with impacts better, similar or worse than those of the Proposed Project, depending upon the environmental topic. Implementation of the Cal Compact site would generally not avoid impacts that would be encountered at the Playa Vista site. A few conditions would be better and impacts would be avoided that are associated with unique features of the Playa Vista site (i.e., views of the bluffs); however, the alternative site would also not provide the view benefit related to those features that would occur due to the Project's design features at Playa Vista (i.e., the riparian corridor and bluff restoration). This alternative would also result in worse impacts to air quality and earth resources (grading) and less of a beneficial impact to the local jobs/housing balance.

### **Relationship of this Alternative to Project Objectives**

Selection of an alternate site by the decision maker is most appropriate where the decision maker is also the developer, as in a government or quasi-government project such as a fire station or power generation plant wherein the power of eminent domain is available and economic feasibility is not necessarily the predominant factor. The "selection" of an alternate site by a governmental agency decision maker for a private development, however, would seem inappropriate because the decision maker lacks commensurate power to make such alternate site available for a private project and to approve or guarantee approval of the entitlements that would be needed to support such a selection. This is particularly true when the alternate site lies within a different governmental jurisdiction.

The provision of development at an alternative site could meet the Project's basic objective related to the provision of a mixed-use community that provides internally supportive uses, decreasing dependency on the automobile, and increasing efficiency in the utilization of infrastructure. Such development would also meet the basic objective to provide a new community that would generate jobs, housing, and employment of a substantial scale and magnitude. Development at an alternative site would not be consistent with the Project's basic objective to provide housing to meet market demand in the Westside of Los Angeles, nor the objective to address housing needs within the City of Los Angeles, the Westside in particular, pursuant to regional and local plans. This alternative would not meet objectives regarding implementation of a comprehensive program of resource protection, enhancement, and conservation specifically designed for the Playa Vista site, as the alternative site does not have similar natural features. This alternative would not contribute to the Project's objective of providing a development that would be consistent with, and form linkages to, development, transportation, and conservation linkages with the adjacent Playa Vista First Phase Project.

Selection of an alternative site would entail acquisition, engineering, environmental, permit application and other start-up costs for the Applicant with no assurance that entitlements needed would be approved. There would be consequent loss of investment already made for like purpose relative to the Playa Vista site. As discussed above, selection of an alternative site does not lend itself to the type of private development proposed for the Playa Vista site; would be difficult, if not impossible, to implement for the Applicant, and would not meet the Applicant's basic objectives.

In addition to these alternatives analyzed, numerous other alternatives were considered for inclusion in the analysis, but were rejected pursuant to Section 15126.6(c) of the CEQA Guidelines, which states: "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." Alternatives considered but rejected include regional park (active use and habitat restoration variations), public entertainment uses and resort hotel, light industrial/institutional uses, transit uses/multi-mode transit center and school.

Table 1 and Table 2 on pages 25 and 29 summarize the impacts of the alternatives analyzed relative to those of the Proposed Project.

Table 1

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

Issue Area	Alternative 1: No Project	Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning	Alternative 3: Existing Specific Plan- Buildout	Alternative 4: Reduced Intensity – 25% Reduction	Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office	Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses	Alternative 7: Designated Alternative Site
<b>Earth</b>							
Grading	Better/Worse	Better/Worse	Worse	Similar	Similar/Better	Similar/Better	Worse
Dewatering/Subsidence	Similar	Better/Similar	Similar	Similar	Similar	Similar/Better	Better
Seismic Hazards	Better	Better	Similar	Similar/Better	Similar/Better	Similar/Better	Better
Slope Stability	Worse/Similar	Worse/Similar	Similar	Similar	Similar	Similar	Better
<b>Air Quality</b>							
Construction/Regional Emissions	Better	Better	Similar	Better	Better	Better	Worse
Construction/Local Emissions	Better	Better	Similar	Better	Better	Better	Similar
Operations/Regional Emissions	Better	Better	Worse	Better	Better	Better	Similar
Operations/Local Emissions	Better	Better	Worse	Better	Better	Better	Similar
<b>Water Resources/Hydrology</b>							
Surface Water	Similar	Similar	Similar	Similar	Better/Similar	Similar	Similar
Groundwater	Similar	Similar	Worse	Similar	Better/Similar	Similar	Similar
<b>Water Resources/Water Quality</b>							
Surface Water	Similar	Similar	Worse	Similar	Similar	Similar	Similar
Groundwater	Similar	Better	Similar	Similar	Similar	Similar	Similar
<b>Biotic Resources</b>							
Plant Life	Worse	Worse	Better	Better	Better	Better	Better
Animal Life	Worse	Worse	Better	Better	Better	Better	Better

Table 1 (Continued)

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

<b>Issue Area</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning</b>	<b>Alternative 3: Existing Specific Plan- Buildout</b>	<b>Alternative 4: Reduced Intensity – 25% Reduction</b>	<b>Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office</b>	<b>Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses</b>	<b>Alternative 7: Designated Alternative Site</b>
<b>Noise</b>							
Construction	Better	Better	Similar	Better	Better	Better	Similar
Stationary	Better	Better	Similar	Better	Better	Better	Similar
Mobile	Better	Better	Similar	Better	Better	Better	Worse
<b>Light and Glare</b>							
Natural Light – Shading	Better	Better	Worse	Similar	Similar	Better	Worse
Artificial Light and Glare	Better	Better	Worse	Similar	Similar	Similar	Worse
<b>Land Use</b>							
Regulatory	Better/Worse	Better/Worse	Similar	Similar	Similar	Similar	Similar
Land Use Patterns	Better	Better	Worse	Similar	Worse	Worse	Worse
<b>Mineral Resources</b>							
Mineral Resources	Better	Similar	Similar	Better	Similar	Similar	Similar
<b>Safety/Risk of Upset</b>							
Safety/Risk of Upset	Better	Better	Similar	Better	Similar/Better	Similar/Better	Similar

Table 1 (Continued)

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

<b>Issue Area</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning</b>	<b>Alternative 3: Existing Specific Plan- Buildout</b>	<b>Alternative 4: Reduced Intensity – 25% Reduction</b>	<b>Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office</b>	<b>Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses</b>	<b>Alternative 7: Designated Alternative Site</b>
<b>Population, Housing and Employment</b>							
Population	Worse	Worse	Worse	Similar	Similar	Similar	Similar
Housing	Worse	Worse	Worse	Worse	Worse	Worse	Similar
Employment	Worse	Worse	Better	Worse	Worse	Worse	Similar
Jobs/Housing Balance	Worse	Worse	Worse	Similar	Better/Worse	Worse	Worse
<b>Transportation</b>							
Traffic and Circulation <sup>a</sup>	Better	Better	Worse	Better	Better	Better	Similar
Parking	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Bicycle Plan	Worse	Worse	Worse	Similar	Similar	Similar	Worse
<b>Public Services</b>							
Fire Protection	Better	Better	Similar	Better	Better	Better	Similar
Police Protection	Better	Better	Similar	Better	Better	Better	Similar
Schools	Better	Better	Better	Better	Better	Better	Similar
Parks and Recreation	Worse	Worse	Better/Worse	Worse	Worse	Worse	Similar
Libraries	Better	Better	Better	Better	Better	Better	Similar
<b>Energy Consumption</b>							
Energy Consumption	Better	Better	Worse	Better	Better	Better	Similar

Table 1 (Continued)

## COMPARISON OF IMPACTS OF ALTERNATIVES TO THE PROPOSED PROJECT

<b>Issue Area</b>	<b>Alternative 1: No Project</b>	<b>Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning</b>	<b>Alternative 3: Existing Specific Plan- Buildout</b>	<b>Alternative 4: Reduced Intensity – 25% Reduction</b>	<b>Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office</b>	<b>Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses</b>	<b>Alternative 7: Designated Alternative Site</b>
<b>Utilities</b>							
Water Consumption	Better	Better	Better	Better	Better	Better	Similar
Wastewater	Better	Better	Worse	Better	Better	Better	Similar
Solid Waste	Better	Better	Better	Better	Better	Better	Similar
<b>Visual Qualities (Aesthetics and Views)</b>							
Aesthetics	Better/Worse	Better/Worse	Worse	Similar	Similar	Better	Similar
Views	Better	Better	Worse	Better	Better	Better	Better/Worse
<b>Cultural Resources</b>							
Paleontological Resources	Better/Worse	Better/Worse	Similar	Similar	Similar	Similar	Better/Worse
Archaeological Resources	Better/Worse	Better/Worse	Similar	Similar	Similar	Similar	Better/Worse
Historical Resources	Similar	Similar	Similar	Similar	Similar	Similar	Similar

Source: PCR Services Corporation, 2003.

Table 2

## QUANTITATIVE COMPARISON OF THE ALTERNATIVES TO THE PROPOSED PROJECT

Environmental Impact	Proposed Project	Alternative 1: No Project	Alternative 2: No Project – Development Permitted by Existing Specific Plan and Zoning	Alternative 3: Existing Specific Plan – Buildout	Alternative 4: Reduced Intensity – 25% Reduction	Alternative 5: Reduced Uses – 25% Residential Reduction, No Retail or Office	Alternative 6: Reduced Uses – 75% Residential Reduction, No Retail, Office or Community- Serving Uses
<b>Traffic Circulation</b>							
Daily Trips	24,220	0 (-)	1,568	38,696 (+)	18,785 (-)	11,817 (-)	3,809 (-)
Locations at LOS E or F (A.M./P.M.), prior to mitigation	90/108 <sup>d</sup>	84/104	83/104 (-)	97/113 (+)	89/106 (-)	87/105 (-)	83/104 (-)
<b>Active Open Space (Parks)</b>	12.4 acres <sup>c</sup>	0 acres (-)	0 acres (-)	0 acres (-)	9.6 acres (-)	9.6 acres (-)	9.6 acres (-)
<b>School (students)</b>	675	0 (-)	9 (-)	413 (-)	505 (-)	469 (-)	155 (-)
<b>Population/Housing/Employment</b>							
Population	5,720	0 (-)	0 (-)	0 (-)	4,290 (-)	4,290 (-)	1,430 (-)
Housing (units)	2,600	0 (-)	0 (-)	0 (-)	1,950 (-)	1,950 (-)	650 (-)
Employment	1,180	0 (-)	216 (-)	9,252 (+)	885 (-)	60 (-)	0 (-)
Jobs/Housing Ratio <sup>a</sup>	0.45	N/A	(-) <sup>b</sup>	(-) <sup>b</sup>	0.45 (=)	0.03 (+)	0 (-)
Jobs/housing ratio in Local Area with Project <sup>a</sup>	2.43	2.66 (-)	2.67 (-) <sup>b</sup>	3.06 (-) <sup>b</sup>	2.49 (-)	2.46 (-)	2.59 (-)

Note: This table includes only the Proposed Project and the alternatives that have development components that are different than those of the Proposed Project. As such, Alternative 7, Alternate site, is not included. Further, the environmental impact areas are a sampling of representative and quantifiable topics.

(+) = greater/more than the Proposed Project

(=) = same/equivalent than the Proposed Project

(-) = fewer/less than the Proposed Project

<sup>a</sup> The comparison for this topic (+, -, or =), is based on whether the ratio is more favorable with regard to the regional goal, rather than absolutely greater or less than the Proposed Project.

<sup>b</sup> These alternatives would add jobs, and no housing to a jobs rich area.

<sup>c</sup> 11.4 acres of parks and 1.0 acre of bike lanes.

<sup>d</sup> Under the No Playa Vista Drive Bridge 2010 Baseline Scenario, the Proposed Project would result in 92 and 108 locations at LOS E or F in the A.M. and P.M. peak hours, respectively, prior to mitigation.

Source: PCR Services Corporation, 2003.



---

**I. EXECUTIVE SUMMARY**  
**G. SUMMARY OF PROJECT IMPACTS**

---

**1. EARTH**

**a. Environmental Impacts**

**Grading**

**Excavation and Fill**

Fill and excavation activities during the grading phase of construction would result in a less-than-significant impact because the proposed grading activities would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury, and one or more distinct and prominent geologic or topographic features would not be destroyed, permanently covered or materially and adversely modified.

**Erosion and Sedimentation**

Grading activities have the potential to result in erosion and sedimentation; however, implementation of BMPs and other erosion and sedimentation control measures would enable Proposed Project-related grading, excavation and other earth-moving activities to avoid a significant impact. As such, construction of Proposed Project components (i.e., the Urban Development and Habitat Creation/Restoration Components) would result in a less-than-significant impact by not constituting a geologic hazard to other properties by causing or accelerating instability from erosion; or accelerating natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

Operation of Proposed Project components would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion, and would not accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Therefore, operations-related impacts would be less than significant.

## **Dewatering**

Dewatering would be required for the construction and operation of the Urban Development Component. However, dewatering activities during construction and operation of Urban Development uses are anticipated to result in a less-than-significant impact since they would not: cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury; constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

## **Subsidence**

Because subsidence is minimal in and around the Proposed Project site, and no significant subsidence is anticipated in the area (i.e., from dewatering activities during construction and operation of proposed uses), development of the Proposed Project components would not cause or accelerate geological hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. As such, subsidence impacts to or from the Proposed Project would be less than significant.

## **Seismic Hazards**

### **Groundshaking and Rupture**

Although the Proposed Project site is located within a region subject to seismic events, development of the Proposed Project is not expected to expose people or structures associated with the Urban Development Component to a higher level of risk from groundshaking or surface rupture than would otherwise occur in other parts of the region. As such, the groundshaking and fault rupture hazard associated with the Urban Development Component is a less-than-significant impact, as the Proposed Project would not cause or accelerate groundshaking and fault rupture hazards.

### **Tsunami and Seiche**

The Proposed Project site is not expected to be affected by seiching, and the site is not located in a flood hazard zone on the applicable flood hazard map (such as would be subject to tsunami-related flooding). Consequently, impacts would be less than significant, as the Proposed Project would not cause or accelerate tsunami or seiche hazards, which would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

### **Liquefaction Potential**

Although the Proposed Project site is located in a potentially liquefiable area, on-site geotechnical investigations have concluded that the potential for adverse effects from liquefaction is minimal, given the thickness and distribution of liquefiable soils on-site. As such, given compliance with the provisions required by City building and safety codes and by the Uniform Building Code (UBC), 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.

### **Lurching**

The Bluffs are sufficiently remote from the Urban Development Component, and bluff restoration under the Habitat Creation/Restoration Component would only be at the surface such that lurching, if it ever did occur, would not result in substantial damage to structures or infrastructures, or expose people to substantial risk of injury; therefore, no significant impact is anticipated.

### **Slope Stability**

The Urban Development Component would not have the potential to affect slope stability, or be affected by slope failure. However, the Habitat Creation/Restoration Component could have the potential to affect, or be affected by, unstable slopes. Therefore, the Habitat Creation/Restoration Component would result in a potentially significant impact, since the Proposed Project could cause or accelerate a geologic hazard which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury, and slope failure could destroy, permanently cover, or materially and adversely modify a distinct and prominent geologic or topographic feature (i.e., the Riparian Corridor).

Impacts to earth resources from implementation of the Project's Equivalency Program would be similar to those of the Proposed Project and would be less than significant. Likewise, impacts resulting from implementation of the Project's off-site improvements, though they would occur at various locations within the Project vicinity, would be comparable to those of the Proposed Project and would be less than significant.

## b. Recommended Mitigation Measures

### Mitigation Measures for the Proposed Project and the Equivalency Program

#### Slope Stability

- Prior to completion of the Riparian Corridor, slope stability remedial measures shall be implemented as appropriate for the areas of potential instability below Cabora Road in accordance with the Group Delta Consultants (GDC) bluff stabilization final assessment report dated December 3, 2001 (revised January 31, 2002) and approved by the City of Los Angeles Department of Public Works on February 19, 2002. Identification of areas having the potential for slope stability problems is shown in the GDC report and completion of the appropriate mitigation (slope stability remedial) measures shall be subject to approval of the Department of Public Works. Completion of the slope repair shall be monitored by a qualified engineer subject to approval of the City of Los Angeles Department of Public Works.

In accordance with the recommendations of the GDC report, the following slope repair methods would be employed as appropriate to minimize the potential for slope failures in areas of potential instability. The applicable locations of each repair type is shown within the GDC report, and that same information is also shown on a Figure that has been attached to the MMRP of the Proposed Project.

*Type 1: Full Slope Height Fill* – The affected portions of the slope would be cut back in benches, a minimum of one equipment width into dense native soil with a 2-foot deep key at the toe. The removed material would be replaced with material having a minimum cohesion of 200 pounds per square foot (psf) and effective angle of internal friction of 30°, with a slope grade of 1.5:1 (horizontal to vertical distance, or H:V).

*Type 2: Partial Slope Height Fill* – A portion of the slope height would be cut back into dense native soil and filled with material having a minimum cohesion of 200 psf and effective angle of internal friction of 30°, in lifts of 8-inches or less in thickness. The slope grade would match the surrounding grade of 1.5:1 (H:V) or flatter.

- A soil erosion resistant matting shall be used in the Proposed Project site for the portion of the slope below Cabora Road to reduce the accumulation of soil debris.
- Permanent erosion control features (i.e., rip-rap, concrete steps, stones) shall be installed at all stormwater discharge points within the southern portion of the Proposed Project site in a manner satisfactory to the City of Los Angeles' Department of Building and Safety and/or Department of Public Works, as appropriate.

---

**Other**

- All dewatering shall be conducted in accordance with the requirements of permits obtained from the appropriate permitting agency(ies) (i.e., NPDES permits obtained from the Regional Water Quality Control Board and/or Industrial Waste Discharge Permits obtained from the City of Los Angeles Department of Public Works). Prior to initiating any dewatering activities that are not included within the scope of permit provisions, the Applicant/Contractor must update the plans and provisions related to the permit and must notify the Regional Water Quality Control Board and/or City Department of Public Works, as applicable, of any such plan/provision modifications.
- Prior to the issuance of grading permits or “B” permits for initial site preparation, a pest control firm shall be retained to conduct and implement a rodent control program to prevent the migration of rodents or pest to neighboring properties. The rodent control program shall comply with all applicable local, state, and federal regulations. Evidence shall be provided to the advisory agency prior to the issuance of any permit that this provision has been satisfied.

**c. Unavoidable Adverse Impacts**

Implementation of the Proposed Project would not result in any significant impacts due to the implementation of mitigation measures and Project Design Features, as discussed previously. Specifically, the Urban Development Component would not cause or accelerate geologic hazards which would result in substantial damage to structures, or infrastructure, or expose people to substantial risk of injury. Although the Habitat Creation/Restoration Component has the potential for significant impacts relative to slope stability, with implementation of slope repair mitigation measures, the Habitat Creation/Restoration Component would not cause or accelerate geologic hazards which would result in substantial damage to structures, or infrastructure, or expose people to substantial risk of injury. Therefore, slope stability impacts as pertains to geologic hazards would be less than significant. With adherence to the provisions of the Playa Vista SWPPP and applicable BMPs, construction and operation of the Urban Development and Habitat Creation/Restoration Components would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion or accelerate the natural processes of wind and water erosion sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Erosion and sedimentation impacts would be less than significant. Additionally, the Urban Development Component would not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. The Habitat Creation/Restoration Component, however, has the potential to affect, or be affected by, slope stability impacts, including slope failure. Such impacts could have the potential to destroy, permanently cover, or materially and adversely modify a distinct and

prominent geologic or topographic feature (e.g., the Bluffs or off-site Riparian Corridor). Implementation of applicable mitigation measures relative to slope stability would minimize the potential for slope failure, and would thus reduce slope stability impacts associated with the Habitat Creation/Restoration Component to a level less than significant. In summary, with implementation of applicable mitigation measures, no unavoidable adverse impacts with respect to earth resources are anticipated to occur. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

#### **d. Cumulative Impacts**

For the most part, the earth resources impacts of the Proposed Project would be unique to the Proposed Project site, not leading to cumulative effects in conjunction with related projects. The only other development of note in close proximity to the Proposed Project would be the previously approved Playa Vista First Phase Project, which is adjacent to the east and west of the Proposed Project site. Because the Proposed Project site and the adjacent Playa Vista First Phase Project site are adjacent, the two projects' combined earth impacts may be evaluated relative to cumulative effects. The adjacent Playa Vista First Phase Project, currently under construction, is not anticipated to result in significant earth resources impacts, and BMPs and Project Design Features are being employed to minimize the potential for impacts from geologic hazards, erosion and sedimentation, and landform alteration. Such BMPs and design features would also be applied during implementation of the Proposed Project. As such, the Proposed Project and the adjacent Playa Vista First Phase Project, considered cumulatively, would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury; constitute a geologic hazard to other properties by causing or accelerating instability from erosion; accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site; or destroy, permanently cover, or materially and adversely modify one or more distinct and prominent geologic or topographic features. Therefore, cumulative earth resources impacts of the Proposed Project and the adjacent Playa Vista First Phase Project would be less than significant. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## **2. AIR QUALITY**

### **a. Environmental Impacts**

This air quality analysis evaluates air emissions attributable to the Project's construction and post-construction (e.g., operational) activities for criteria air pollutants, air toxics, and odors. In addition, the Project's compatibility with applicable air quality policies as set forth in the City

of Los Angeles General Plan and regional plans prepared by SCAG and the SCAQMD is also assessed.

Construction of the Proposed Project would generate pollutant emissions from the following activities: (1) site preparation operations (grading/dredging/filling); (2) travel by construction workers to and from the Project site; (3) delivery and hauling of construction materials and supplies to and from the Project site; (4) fuel combustion by on-site construction equipment; and (5) the application of architectural coatings and other building materials that release reactive organic compounds (ROC). Construction related daily regional emissions from both direct and indirect sources exceed the significance thresholds for CO, NO<sub>x</sub>, and ROC. Thus, emissions of these pollutants would result in a significant regional air quality impact during the Project's construction phase. Regional construction emissions from both direct and indirect sources would not exceed the daily significance thresholds for PM<sub>10</sub> and SO<sub>x</sub>. During construction, a major source of air emissions occurs during the grading/site preparation phase where large numbers of diesel powered construction equipment are involved with soil disturbance. During this phase of construction operations, not only are there combustion emissions from construction equipment, but it is during this phase that fugitive PM<sub>10</sub> emissions are at their greatest magnitude. An analysis of local air quality impacts from construction operations focused on PM<sub>10</sub> emissions and their impact on nearby sensitive receptors (e.g., residences, schools, etc.). The maximum construction-related PM<sub>10</sub> impacts near the Project site occurred at the multi-family residential area across from the Project site north of Jefferson Boulevard with a concentration of 5.6 µg/m<sup>3</sup>. As the Project would not cause an incremental increase in localized PM<sub>10</sub> concentrations of 10.4 µg/m<sup>3</sup>, a less-than-significant air quality impact would occur during the Project's construction phase. In addition, the highest potential for construction-related PM<sub>10</sub> concentration impacts associated with the Project's proposed off-site roadway improvements occurs southeast of the Inglewood Boulevard and Culver Boulevard intersection would be below the 10.4 µg/m<sup>3</sup> threshold. This same conclusion applies to St. Gerard Majella School, which is located northwest of this intersection. In addition, construction-related localized emissions of NO<sub>2</sub> and CO would not exceed the relevant ambient air quality standards and as a result, a less-than-significant impact would occur.

Construction of the Proposed Project would generate toxic air pollutant emissions primarily from diesel-powered construction equipment, haul trucks, architectural coatings and solvents and limited amounts during the remediation of potentially contaminated on-site soils. The analysis of localized air toxics impacts resulted in a maximum off-site individual cancer risk of 5.7 in a million. As the Project would not emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million, air toxic emissions during construction would be less than significant.

No construction activities are proposed which would create objectionable odors and, therefore, no significant impacts would occur.

Air pollutant emissions associated with occupancy and operation of the Proposed Project would be generated by the consumption of electricity and natural gas, by the operation of on-road vehicles and by miscellaneous area sources (among other things, landscaping equipment, consumer/commercial solvent usage, architectural and automotive coatings, restaurant charbroilers, and emergency generators). In its operational phase, the Project would result in a net increase in weekday emissions of 2,522 pounds per day of CO, 362 pounds per day of NO<sub>x</sub>, 366 pounds per day of PM<sub>10</sub>, 582 pounds per day of ROC, and 27 pounds per day of SO<sub>x</sub>. These levels exceed SCAQMD significance thresholds for CO, NO<sub>x</sub>, PM<sub>10</sub>, and ROC. While these emissions are those that would occur during the Project's operational phase, the Project's maximum emissions occur during the latter stages of Project construction when Project operational emissions also occur concurrently with construction emissions. During this period, a maximum increase in weekday emissions of 3,215 pounds per day of CO, 847 pounds per day of NO<sub>x</sub>, 389 pounds per day of PM<sub>10</sub>, 907 pounds per day of ROC, and 27 pounds per day of SO<sub>x</sub> would occur. These levels exceed SCAQMD significance thresholds for CO, NO<sub>x</sub>, PM<sub>10</sub>, and ROC.

Project traffic during the operational phase of the Project would have the potential to create local area impacts. An analysis at selected intersections was performed to determine the potential for the presence or the creation of CO hot spots attributable to the Proposed Project. As a result of this analysis, it was determined that the Project does not cause an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively, and no significant impacts to local CO concentrations would occur.

Potential sources of air toxic emissions associated with Project development include, but may not be limited to, diesel particulates from loading docks, delivery trucks, and buses as well as small amounts of toxics from consumer household products. These sources are typical within the urban environment and would contribute small amounts of toxic air pollutants to the Project vicinity, and would be well below any levels that would result in a significant impact on human health. Also, potential localized air toxic impacts from Project-related mobile source emissions would be minimal since the Proposed Project does not include any facilities (e.g., warehouse distribution and truck terminals) that would substantially change the number of heavy-duty trucks on the surrounding roadway network resulting in an increase of diesel particulate emissions. As such, a less-than-significant impact on human health would occur.

No operational activities are proposed which would create objectionable odors; therefore, no significant impacts would occur.



Development of the Proposed Project would be compatible with the air quality policies set forth in the SCAQMD's AQMP, SCAG's RCPG, and the City of Los Angeles General Plan.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The mitigation program for the Proposed Project is set forth in the Air Quality Management Plan for Playa Vista (Playa Vista AQMP or Plan). The Playa Vista AQMP serves the same purpose for the Proposed Project as the SCAQMD's AQMP serves the entire Basin. The Playa Vista AQMP sets forth a comprehensive and strategic program of air emission control strategies, as documented in the mitigation measures set forth below. Emission control strategies of the Playa Vista AQMP address construction and post-construction operational emissions in a two-tier approach. Tier 1 measures include known and currently implemented emissions reduction strategies. It also includes additional mitigation measures, which allow for the identification and implementation of applicable emission reduction strategies which may emerge in the future and for updating the Playa Vista AQMP (refer to the Tier II mitigation measures outlined below). The Playa Vista AQMP is included as Appendix E-8 of the EIR.

#### **a. Playa Vista Air Quality Management Plan**

- Prior to the issuance of any grading or building permits, the Playa Vista AQMP shall be prepared satisfactory to the Planning Department. The Playa Vista AQMP shall identify specific emission reduction/mitigation measures addressing the air quality impacts associated with construction and operations of the Proposed Project, such as construction mitigation measures addressing emissions from heavy-duty construction equipment, fugitive dust, construction deliveries, construction worker travel and the application of architectural coatings; as well as operational mitigation measures addressing emissions from utility consumption, building maintenance, and service and support facilities. The Plan shall implement proactively the strategies called for in the regional Air Quality Management Plan as prepared by the SCAQMD through:
  - Implementation of emission control strategies based on currently available and cost-effective technology, and
  - Providing the means by which future technological advances can be incorporated in the development of the Playa Vista Project.

**b. Monitoring the Playa Vista AQMP**

- Prior to the issuance of any grading/building permit, an Air Quality Monitor, satisfactory to the Director of Planning shall be retained by the Applicant to document compliance with the Playa Vista AQMP. During the Project's construction phase and operational phase, until the Project's buildout, the Monitor shall review all activities occurring on the Project site on a periodic basis and maintain current records on compliance with the Playa Vista AQMP. The Monitor shall submit monthly reports during Project construction, and annual reports during Project operations, until the Project's buildout, documenting compliance with all air emission control measures contained in the Playa Vista AQMP. The records and reports shall be maintained as public documents. The Monitor's identification, qualifications, address and phone number shall be listed in all construction and construction-related contracts and shall be placed in the pertinent files of the Planning Department.

**c. Remedial Action**

- The Applicant shall require in all construction and construction-related contracts, provisions requiring compliance with all applicable environmental conditions included in all relevant entitlement approval actions of the City.
- Upon identification of any instance of non-compliance with the Playa Vista AQMP, the Monitor shall within 48 hours notify the Applicant and the designated representative of the Planning Department, or other appropriate enforcement and monitoring agency. All of the Applicant's applicable contracts shall require corrective actions within 48 hours to attain compliance. Once notified of a condition of non-compliance, the Applicant shall promptly act to attempt to attain compliance. In the event that a contractor, subcontractor, or operator fails to correct the noticed noncompliance, the Applicant, its representative or prime contractor shall retain the contractual right to effect prompt corrective action. Should remedial action not occur, the Director of Planning, or other City enforcement and monitoring agencies, are empowered to issue cease and desist orders.

---

## **d. Emission Control Strategies**

### **(1) Tier 1 Mitigation Measures**

#### **(a) Construction Emissions**

Emission control measures are specified for the following five sources of construction emissions: (1) combustion exhaust of heavy-duty construction equipment, delivery of construction supplies and the off-site hauling of debris; (2) fugitive dust; (3) construction workers traveling to and from the Project site; and (4) application of building materials and architectural coatings.

#### **(i) Construction Equipment/Operation**

- Control Technologies: Apply NO<sub>x</sub> control technologies, such as fuel injection timing retard for diesel engines and air-to-air after cooling, as feasible.
- Low Emission Equipment and Technologies: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.
- Configure construction parking to minimize traffic interference.
- Develop a construction traffic management plan that includes, but is not limited to:
  - Providing temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).
  - Scheduling of construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
  - Rerouting construction trucks off congested streets.
  - Consolidating truck deliveries.
  - Providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
  - Prohibit truck idling in excess of two minutes, whenever practical.
- Where possible use electricity from power lines rather than temporary generators.

- **Construction Practices:** Use only well maintained equipment, utilize proper planning to reduce rework and multiple handling of earth materials, select equipment that is properly sized to minimize trips/use, consolidate deliveries, and maximize off-site construction (i.e., prefabricating and prepainting).
- **Record Keeping:** Log fuel use, hours of operation and periodic maintenance of all construction equipment to ensure proper maintenance.
- Use ultra low-emission vehicles (ULEVs), zero emission vehicles (ZEVs), or other low emission support vehicles and equipment, including fleet vehicles if any, to the extent cost effective and feasible.

### **(ii) Fugitive Dust**

- For disturbed dirt areas which remain inactive over an extended period of time, soil stabilization measures shall be undertaken such as application of moisture retaining binders which pull moisture out of the air to form a cohesive soil binder.
- Replace ground cover in disturbed areas as quickly as possible.
- During dry weather, enclose, cover, water twice daily or apply non-toxic soil binders according to manufacturers' specifications, to exposed piles (i.e., gravel, sand, dirt) with 5 percent or greater silt content.
- Water active grading/construction sites at least twice daily, or as needed during wet weather.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible, or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Section 23114.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads. Water sweepers shall use reclaimed water, where available.
- Apply water up to three times daily or as necessary, to all unpaved parking or staging areas or unpaved road surfaces, during dry weather.
- Limit traffic speeds on all unpaved roads to 25 mph or less.

- Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extending for a centerline distance of at least 100 feet and a width of at least 20 feet.
- Other Dust Controls: Any intensive dust generating activity, such as abrasive blasting, drilling, and grinding must be controlled to the maximum extent feasible. Such control would necessarily be specific to the activity, but could include the use of screens or enclosures, water sprays or collection devices.
- Comply with the requirements of AQMD Rule 403 to the extent not provided above.

### **(iii) Construction Worker Travel**

- All contractors shall be required to participate in a common carpool registry which provides a list of construction workers willing to carpool during all periods of contract performance. This registry shall be maintained by the Applicant and reviewed by the Monitor.

### **(iv) Building Materials and Architectural Coatings**

- Building materials, architectural coatings and cleaning solvents used must comply with all applicable SCAQMD rules and regulations. Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.

## **(b) Post-Construction Operations Emissions**

Tier I emission control measures are specified for three sources of post-construction emissions: (1) service and support facilities; (2) natural gas consumption and electricity production; and (3) building materials, architectural coatings, and cleaning solvents.

### **(i) Service and Support Facilities (point sources)**

- All point source facilities shall obtain all required permits from the SCAQMD. The issuance of these permits by the SCAQMD will require the operators of these facilities to implement Best Available Control Technology and other required measures that reduce emissions of criteria air pollutants.

---

**(ii) Natural Gas Consumption and Electricity Production**

Adherence to the following energy consumption measures shall be made an element of the Playa Vista AQMP if deemed acceptable to the Department of Building and Safety.

- All residential buildings shall be equipped with Energy-Star rated appliances, to the extent feasible.
- All residential and non-residential buildings shall exceed the California Title 24 Energy Efficiency standards for water heating, space heating and cooling, to the extent feasible.
- Energy efficient lighting fixtures, which exceed the California Title 24 Energy Efficiency standards to the extent feasible, shall be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are not needed shall also be used to regulate lighting for interior office common spaces, such as conference rooms and bathrooms.
- All fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed. Exterior lighting fixtures as might be specified by the Department of Water and Power as energy efficient shall be used to the extent such lighting is available and architecturally acceptable.
- All residential and commercial buildings shall be equipped with electric vehicle charging stations to the extent required by the California ARB at the time of construction of the given building.
- Shade producing trees shall be planted at the Proposed Project site to the extent feasible to provide localized as well as overall community cooling.
- All buildings shall employ passive heating and cooling design strategies to the extent feasible.
- All buildings shall be designed to accommodate renewable energy sources, to the extent feasible.

---

**(iii) Building Materials and Architectural Coatings**

- Building materials, architectural coatings and cleaning solvents shall comply with all applicable SCAQMD rules and regulations. Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.

**(iv) Public Information Program**

The Applicant or successor shall circulate or cause to be circulated a semi-annual or more frequent newsletter to all on-site residents, businesses and employees to provide information on carpool incentives, internal shuttle system routes and schedules, on-site housing and job opportunities for on-site employees and residents, and mandatory or voluntary new technologies for air pollution reduction in businesses and homes.

**(2) Tier II Post-Construction Mitigation Measures****(a) Implementation of New Technology**

The following Tier II mitigation measures apply to both Project construction and operations, until Project buildout.

The Applicant or its successors shall, on a yearly basis until Project buildout, identify emerging technologies which may yield emission reductions. Such consideration shall include analysis of the feasibility of new emission reduction measures recommended in updates of the SCAQMD's CEQA Air Quality Handbook.

The Applicant or its successors shall assess the feasibility of implementing such measures based on the following:

- The ability of the measure to reduce air pollutant emissions which result from Project construction operations.
- The new measure or product is equivalent in cost to the standard strategies, measures or products.
- The availability of the new measure or product prior to the time required for implementation.
- The reasonable reliability and reasonably equivalent durability of the new measure or product to standard measures and products.

- The absence of significant adverse impacts to other areas of the environment (e.g., noise, water, aesthetics).
- The consistency of the new measure with the Project's design concepts and objectives.

The Air Quality Monitor shall determine the feasibility of all new recommended measures, technologies or products identified by the Applicant.

Recommendations which are determined to be feasible and appropriate pursuant to the standards set forth above shall be incorporated by the Applicant into all future contracts for construction and development at the Proposed Project.

The Monitor shall also be responsible for providing the Director of Planning with documentation regarding compliance with this provision.

All associated reports and documentation (including feasibility assessment of new emission reduction measures, the Air Quality Monitor's feasibility determination and the Applicant's compliance with the feasible new emission reduction measures and technologies) shall be included in an annual monitoring report to the enforcement and monitoring agencies and kept open for public inspection. Said reports, documentations and monitor's identification, qualifications, address and telephone number shall be placed in the pertinent files of the City Planning Department.

Implementation of new mitigation measures or products would not affect contracts and commitments entered into prior to the date the new mitigation measures/products and strategies meet the above standards. However, contractors shall be informed/advised of the available new emission reduction measures and technologies.

#### **Additional Mitigation Measures for the Off-Site Improvements**

- For each of the road widenings, the Air Quality Monitor shall monitor construction activity and insure implementation of the mitigation measures listed below. The monitor shall check construction procedures. In addition, the Applicant shall identify and the Monitor shall assess the feasibility and recommend implementation of new technological advancements that will help minimize emissions.
- The following procedures to control air emissions shall be applied wherever applicable:



---

## Construction Equipment/Operation

- Control Technologies: Apply NO<sub>x</sub> control technologies, such as fuel injection timing retard for diesel engines and air-to-air after cooling, as feasible.
- Low Emission Equipment and Technologies: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.
- Prohibit truck idling in excess of two minutes, whenever practical.
- Where possible use electricity from power lines rather than temporary generators.
- Construction Practices: Use only well maintained equipment, utilize proper planning to reduce rework and multiple handling of earth materials, select equipment that is properly sized to minimize trips/use, consolidate deliveries, and maximize off-site construction (i.e., prefabricating and prepainting).

## Fugitive Dust

- Replace ground cover in disturbed areas as quickly as possible.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Section 23114.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads. Water sweepers shall use reclaimed water, where available.
- Apply water up to three times daily or as necessary, to all unpaved parking or staging areas or unpaved road surfaces, during dry weather.
- Other Dust Controls: Any intensive dust generating activity, such as abrasive blasting, drilling, and grinding must be controlled to the greatest extent feasible. Such control would necessarily be specific to the activity, but could include the use of screens or enclosures, water sprays or collection devices.

---

## Building Materials and Architectural Coatings

- Building materials, architectural coatings and cleaning solvents used must comply with all applicable South Coast Air Quality Management District (SCAQMD) rules and regulations. Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.

### c. Unavoidable Adverse Impacts

After implementation of all feasible mitigation measures as described above, 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-site and off-site (e.g., delivery trucks) construction sources would have a significant and unavoidable adverse impact on regional air quality. As the Project, inclusive of the Equivalency Program and the Project's proposed off-site improvements, does not cause an incremental increase in localized PM<sub>10</sub> concentrations of 10.4 µg/m<sup>3</sup>, localized impacts to sensitive receptors during construction would be less than significant.

As the Project, inclusive of the Equivalency Program and the Project's proposed off-site improvements, would not emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million, air toxic emissions from construction activities would be less than significant.

No construction activities or materials are proposed which would create objectionable odors and, therefore, no significant impacts would occur.

In the operational phase, the Project, inclusive of the Equivalency Program, would result in a net increase in weekday emissions of 2,522 pounds per day of CO, 362 pounds per day of NO<sub>x</sub>, 366 pounds per day of PM<sub>10</sub>, 582 pounds per day of ROC and 28 pounds per day of SO<sub>x</sub>. While these emissions are those that would occur during the Project's operational phase, the Project's maximum emissions occur during the latter stages of Project construction when Project operational emissions also occur concurrently with construction emissions. During this period, inclusive of the Equivalency Program and the Project's proposed off-site improvements, a maximum increase in weekday emissions of 3,215 pounds per day of CO, 847 pounds per day of NO<sub>x</sub>, 389 pounds per day of PM<sub>10</sub>, 907 pounds per day of ROC, and 27 pounds per day of SO<sub>x</sub> would occur. These levels exceed SCAQMD significance thresholds for CO, NO<sub>x</sub>, PM<sub>10</sub>, and ROC. Mitigation measures identified above would reduce the potential air quality impacts of the Project, inclusive of the Equivalency Program and the proposed off-site improvements, to the degree technically feasible, but emissions would remain above SCAQMD significance

thresholds. Therefore, operation of the Project, inclusive of the Equivalency Program, would have a significant and unavoidable adverse impact on regional air quality. As the Project, inclusive of the Equivalency Program, does not cause an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively, no significant impacts to local CO concentrations would occur.

Operation of the Project, inclusive of the Equivalency Program, is not anticipated to emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million. As such, a less-than-significant impact on human health would occur. Furthermore, on-site sensitive receptors would not be developed within a quarter mile of existing off-site sources of toxic air contaminants.

The Project's proposed residential, office and community serving land uses, inclusive of the Equivalency Program, would not create adverse odors. However, there is a potential that on-site retail and restaurant uses have the potential to create odors. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less-than-significant level.

Development of the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would be compatible with the air quality policies set forth in the SCAQMD's AQMP, SCAG's RCPG, and the City of Los Angeles General Plan.

#### **d. Cumulative Impacts**

Buildout of year 2010 related projects within a similar time frame as the Proposed Project would increase short-term emissions for concurrent activities during any day of the Project's construction period. Since the worst-case construction day for the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, was identified to be significant, any additional construction activities occurring during this time and in the vicinity of the Proposed Project site would be adding an additional air pollutant emission burden to these significant levels. As emission levels associated with the Proposed Project already are projected to have a significant impact, a significant and unavoidable cumulative impact with respect to construction emissions would occur.

The SCAQMD has set forth both a methodological framework as well as significance thresholds for the assessment of a project's cumulative air quality impacts. Based on the SCAQMD's methodology (presented in Chapter 9 of the *CEQA Air Quality Handbook*), the Project, inclusive of the Equivalency Program, would have a significant cumulative impact on air quality. In addition, implementation of the Project would also result in an increase in emissions

which would contribute to region-wide emissions on a cumulative basis and as such, the Project's cumulative air quality impacts are also concluded to be significant. In such cases, the SCAQMD recommends that all projects, to the extent possible, employ feasible mitigation measures which has been done with regard to the Proposed Project, inclusive of the Equivalency Program.

### **3. WATER RESOURCES – HYDROLOGY**

#### **a. Environmental Impacts**

##### **Surface Water Hydrology Impacts**

No development portion of the Proposed Project site (i.e., the Urban Development Component) is within the Federal Emergency Management Agency (FEMA) 100-Year Floodplain. The proposed drainage system for the Proposed Project (inclusive of the Urban Development drainage system, and the Riparian Corridor as part of the Habitat Creation/Restoration Component) has been designed to convey increases in total peak runoff rates and volumes and provide an appropriate level of on-site flood protection, detention and drainage. Therefore, the Project would not cause flooding of the existing local storm drains during the projected 50-year developed storm event, which would have the potential to harm people or damage property.

During construction of the Proposed Project, a Stormwater Pollution Prevention Plan and Erosion Control Plan would be implemented to provide for temporary stormwater management. These plans would prevent construction from adversely affecting the amount of surface water in a waterbody. Additionally, these stormwater management measures would be temporary; hence, the construction of the Proposed Project would not result in a permanent adverse change to the movement of surface water.

Although the development of the Urban Development area 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 (the Riparian Corridor, a portion of which would be constructed as part of the Habitat Creation/Restoration Component and the Freshwater Marsh), which would be designed specifically for stormwater management. Therefore, the Proposed Project (inclusive of both Components) would not significantly reduce or increase the amount of surface water in a waterbody.

As a Project Design Feature, the Proposed Project would result in grading of the Project area, which would, by design, modify the surface runoff patterns during Proposed Project construction and operation. Stormwater runoff during Proposed Project operation would also be redirected from the Jefferson Storm Drain into the Central Storm Drain and Riparian Corridor (a portion of which would be constructed as part of the Habitat Creation/Restoration Component). This redirection of runoff from the Jefferson Storm Drain is considered beneficial since it would result in a decrease of runoff in the Jefferson Storm Drain, which does not meet City design standards for hydraulic capacity. Because the Proposed Project would result in a beneficial impact on the constrained Jefferson Storm Drain, and would not adversely impact any other stormwater drainage facilities, operation of the Proposed Project would not result in a permanent adverse change in the movement of surface water.

### **Groundwater Hydrology Impacts**

Because construction and operation of the Project's Habitat Creation/Restoration Component is expected to allow that portion of the Project site to remain as pervious surfaces, it is not expected to change potable water level sufficiently or result in demonstrable and sustained reductions of groundwater recharge capacity. As such, a less-than-significant impact would occur. Construction of the Project's Urban Development Component includes construction of temporary and permanent dewatering systems. Furthermore, groundwater in the area of the Proposed Project site is not pumped for potable water. Although dewatering may cause local changes in the flow direction of shallow groundwater, this change in flow would be localized and, therefore, considered negligible from a regional basin perspective. Therefore, the Proposed Project is not anticipated to change potable water level to sufficiently reduce the ability of the water utility to use groundwater for public water supplies, conjunctive uses purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought, reduce yield of adjacent wells/well fields, or adversely change the rate or direction of flow of groundwater. Accordingly, a less-than-significant impact would occur. 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/year. The introduction of additional landscape irrigation is estimated to produce approximately 18 acre-feet/year of groundwater recharge. Therefore, the net increase of approximately 6 acre-feet/year of increased recharge due the Proposed Project is considered positive, but negligible from a regional basin perspective; hence, the Project would not result in a demonstrable and sustained reduction of groundwater recharge capacity, and no significant impact would occur.

Surface water and groundwater hydrology impacts resulting from implementation of the Project's Equivalency Program would be similar to those of the Proposed Project and would be less than significant, due to the similarity in construction activities, proposed land uses, and site

characteristics. Additionally, hydrology impacts resulting from construction of the Project's off-site improvements, though the improvements would occur at various locations within the Project vicinity, would be similar to those of the Proposed Project. Operation of off-site improvements would not notably affect surface water or groundwater hydrology in the Project vicinity, and therefore, impacts would be less than significant.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of any building permit, the Applicant shall be required to complete or otherwise guarantee completion of the Freshwater Marsh, Riparian Corridor and other structural/treatment control BMPs (e.g., Best Management Practice catchbasins, etc.), satisfactory to the City's Department of Public Works and/or other responsible agencies (e.g., U.S. Army Corps of Engineers in conformance with Permit No. 90-426-EV).
- Prior to recordation of the first final map, a covenant and agreement shall be prepared and recorded satisfactory to the Department of Public Works, Bureau of Sanitation, Stormwater Management Division and the City Attorney, as appropriate, which shall include the following:
  - Properties within the Proposed Project shall be encumbered with an obligation to perpetually fund the operation and maintenance of the appropriate structural/treatment control BMPs, such as the Freshwater Marsh and Riparian Corridor and Best Management Practice catchbasins, satisfactory to the Department of Public Works. Properties dedicated to a public entity or owned by the property owners' association (i.e., parks, community-serving parcels, etc.) shall not be subject to this funding obligation.
  - The Proposed Project shall implement and perform the requirements set forth in the Operations, Maintenance and Monitoring Manual for the Freshwater Wetland System, in accordance with all permit requirements to monitor and evaluate the hydrologic and water quality performance of the Freshwater Marsh and Riparian Corridor. Information obtained from the monitoring program shall be translated into corrective action and system modifications if necessary, in accordance with the U.S. Army Corps of Engineers (USACE) requirements and satisfactory to the City of Los Angeles Department of Public Works.
  - A monitoring report shall be prepared as required by applicable permits which addresses water sampling locations, frequency of sampling, pollutants of concern to be tested, testing methods, corrective measures, if necessary, etc. for the Freshwater Marsh and Riparian Corridor. The report shall be submitted to the

---

USACE, Regional Water Quality Control Board, and the City of Los Angeles Department of Public Works, Bureau of Sanitation.

- Maintenance records for the structural/treatment control BMPs shall be maintained and submitted to the City of Los Angeles Department of Public Works, Bureau of Sanitation.
  
- Prior to issuance of any building permit, the Applicant shall encumber the parcel for which the permit is sought with a covenant to fund the Playa Vista Community Service Organization or other funding mechanism, satisfactory to the Advisory Agency and the City Engineer, for the purpose of funding the operation and maintenance of the Freshwater Marsh and Riparian Corridor and other structural/treatment control BMPs. The covenant shall obligate future owners within the parcel to fund the Community Service Organization or other funding mechanism, and shall contain provisions detailing the timing and mechanism for such funding, satisfactory to the Department of Public Works. Properties dedicated to a public entity or owned by the property owners' association (i.e., parks community-serving parcels, etc.) shall not be subject to this funding obligation.
  
- Prior to issuance of any building permit, the Applicant or the Playa Vista Community Service Organization shall establish and enter into an agreement with the Ballona Wetlands Conservancy or other responsible entity, which shall address the responsibility for funding, coordination, and oversight of all operations and maintenance procedures for the Freshwater Marsh and Riparian Corridor. Maintenance shall be conducted, and maintenance reports submitted periodically and after each storm event to prevent trash, debris, and sediments from clogging the system, in accordance with the U.S. Army Corps of Engineers (USACE) requirements and satisfactory to the City of Los Angeles Department of Public Works.

### **c. Unavoidable Adverse Impacts**

Impacts to surface water hydrology would be less than significant, as the Proposed Project is not anticipated to cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property; substantially reduce or increase the amount of surface water in a waterbody; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Impacts to groundwater hydrology would be less than significant, as the Proposed Project is not anticipated to change potable water level sufficiently to reduce the ability of the water

utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; reduce yields of adjacent wells or well fields (public or private); or adversely change the rate or direction of flow of groundwater; or result in demonstrable and sustained reductions of groundwater recharge capacity.

These impacts are inclusive of the Proposed Project, the Equivalency Program and the Project's off-site improvements.

#### **d. Cumulative Impacts**

The majority of the off-site areas tributary to the adjacent Playa Vista First Phase Project and the Proposed Project consist of highly urbanized development. As a result, substantial additional changes in off-site hydrologic factors affecting runoff rates (i.e., increases in impervious surface area, changes in drainage routes, etc.) are unlikely to occur. Changes in topography and developed acreage should be minimal within the entire developed watershed. While land uses may change, the total impervious area, and therefore runoff rates, should remain relatively constant. For instance the West Bluff project (Tentative Tract 51122), a 38-acre residential development, located south of the Freshwater Marsh has been approved since the adjacent Playa Vista First Phase Project was approved. The hydrology for Tentative Tract 51122 includes the diversion of 27 acres of area currently draining south to Manchester Boulevard and eventually to the Freshwater Marsh. Based upon the hydrology prepared by Robert Bein, William Frost and Associates, the total 50-year peak runoff generated by the 38 acres of residential tributary area (on-site and off-site to Tract 51122) is 124 cubic feet per second (cfs) with a total storm volume of 49 acre-feet, and the total 50-year peak flow rate generated by the 27 acres of diverted area is 88 cfs with a total storm volume of 35 acre-feet. Per City of Los Angeles requirements, the analysis of future conditions with the addition of the Proposed Project assumes that all off-site areas within the local watershed have been built out to the current zoning designations. Therefore, the potential for cumulative impacts, including Tentative Tract 51122, has already been accounted for in the Project Design Features for the Proposed Project. As such, cumulative impacts to surface water hydrology from implementation of the Proposed Project, related projects, and other background growth would be less than significant, as the Proposed Project and related growth is not anticipated to cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property; substantially reduce or increase the amount of surface water in a waterbody; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Cumulative groundwater hydrology impacts could result from the overall utilization of respective groundwater basins located in proximity to the Proposed Project and related project



sites. To the extent that it is possible that public supply wells are located within or near the related project sites, and the related projects could extract water from local basins, such cumulative utilization of groundwater in the region could adversely affect local and regional groundwater hydrology. However, the extent to which the related projects would extract or otherwise directly utilize groundwater is not possible to assess. However, the potential for impacts to groundwater hydrology from the related projects in conjunction with the Proposed Project is not anticipated to be adverse inasmuch as the related projects would be expected to utilize water supplies from the respective public water suppliers (e.g., Los Angeles Department of Water and Power), including possible use of groundwater as a supply source. Such groundwater consumption would be regulated by the respective public water supply agencies, for which groundwater utilization is limited by entitlements to maintain the integrity and productivity of groundwater basins. Consequently, no significant cumulative impacts to groundwater hydrology are expected, as the Proposed Project and related growth is not anticipated to change potable water level sufficiently to reduce the ability of the water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; reduce yields of adjacent wells or wellfields (public or private); or adversely change the rate or direction of flow of groundwater; or result in demonstrable and sustained reductions of groundwater recharge capacity. As such, no significant cumulative impacts are anticipated.

These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

#### **4. WATER RESOURCES – WATER QUALITY**

##### **a. Environmental Impacts**

##### **Surface Water Quality Impacts**

Potential significant impacts of the Proposed Project were assessed both numerically and narratively. In the numerical assessment, a pollutant loadings and concentrations model, developed specifically for the planned development, was used to evaluate potential changes in concentrations in stormwater runoff from pre-First Phase, with Playa Vista First Phase, and with Playa Vista First Phase and Proposed Project areas. The model was also used to compare numerical water quality benchmarks to the model-predicted pollutants (i.e., total suspended solids, total phosphorus, total Kjeldahl nitrogen, oil and grease, and dissolved and total copper, lead, and zinc). The numerical impact assessment found less-than-significant increases in pollutant loadings and concentrations and no exceedances of numerical water quality

---

benchmarks in waterbodies with designated beneficial uses, as defined in the Water Quality Control Plan (Basin Plan).

In addition to using the pollutant loadings model for assessing numerical significance impacts, narrative significance impacts were also assessed by qualitatively discussing the Project Design Features with respect to the following:

1. Potential impacts to the Santa Monica Bay,
2. Requirements in the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP),
3. Characteristics and potential sources of the 303(d) listed parameters,
4. Narrative water quality objectives of the Basin Plan,
5. Stability of channels receiving stormwater runoff from the Proposed Project site,
6. Potential impacts of dry-weather (nuisance) flows from the Proposed Project site, and
7. Potential deviation from the Performance Criteria.

Considering all of the inputs to Santa Monica Bay, the quantity of stormwater runoff from the Proposed Project site is less than significant in comparison. In fact the adjacent Playa Vista First Phase Project together with the Proposed Project results in net benefits to receiving waters listed in the Basin Plan, including the Ballona Wetlands, Ballona Estuary, and Santa Monica Bay. Consequently, the potential water quality impacts to Santa Monica Bay have been qualitatively discussed and determined to be less than significant, via comparisons of Project runoff quality to pre-First Phase loads and concentrations and numerical water quality benchmarks, as well as discussions of 303(d) listed pollutants.

The stormwater treatment system and source control measures for both the adjacent Playa Vista First Phase Project and the Proposed Project were designed specifically with consideration of the local design and treatment requirements and, therefore, are consistent with requirements for stormwater management. The Project Design Features were designed to specifically exceed the requirements of the Los Angeles County SUSMP. This exceedance is not only based upon the size of the treatment system, but also the treatment of significant off-site areas (more than half of the total tributary area of the Freshwater Marsh is from off-site areas) and the high effectiveness of wetland treatment systems over other less effective Best Management Practice (BMP) types that are allowed under the SUSMP program.

In addition to the Freshwater Wetlands System, the treatment control BMPs that were included in the model consist of:

1. Roof downspout planter boxes for all buildings planned for the Proposed Project in the Central Drain catchment,
2. A vegetated swale for all low-flow runoff entering the Riparian Corridor from the Proposed Project area,
3. Catch basin inserts for 100 percent of the runoff entering the Central Drain from the Proposed Project area and additional catch basin inserts for 25 percent of the runoff from other adjacent Playa Vista First Phase and Proposed Project areas,
4. A vegetated swale treating Lincoln Boulevard runoff prior to discharging to the Central Drain, and
5. A hydrodynamic solids separation device treating Lincoln Boulevard runoff prior to discharging to the Freshwater Marsh.

Some of the planned BMPs that are expected to reduce pollutant loads and concentrations in the runoff of the Proposed Project but were not included in the model include street sweeping, public education, catch basin cleaning, trash racks, underground parking, an internal transit system, and a pesticide and fertilizer management program. Street sweeping, public education, catch basin cleaning, and trash racks are anticipated to reduce trash and sediment loadings, as well as contaminants associated with these bulk pollutants. Underground parking and the internal transit system are anticipated to reduce vehicular pollutants including metals. The pesticide and fertilizer management program is anticipated to reduce the amount of nutrients and toxic pollutants generated from landscaping activities.

Peak stormwater runoff discharge rates and channel stability are not considered to be a significant issue with the development of the Proposed Project. The increased runoff due to increased impervious areas would be completely contained within the stormwater treatment system, which includes energy dissipaters (e.g., water quality inserts/catch basin inserts and riprap at outlets) and extended detention in the Freshwater Wetlands System. No detrimental increases in channel velocities are expected and the Proposed Project is not expected to cause regulatory standards to be violated, as defined in the applicable National Pollutant Discharge Elimination System (NPDES) Permit (municipal separate storm sewer system [MS4] Permit; per SUSMP Standards) or the Basin Plan. By not causing a condition of nuisance as defined in the Basin Plan, a nuisance is also not anticipated to be created as defined in Section 13050 of the California Water Code (CWC). The Ballona Wetlands will receive reduced erosive flows because of the routing of flows away from the salt marsh from all but large storm events and the

flow retardation in the Freshwater Marsh. The Ballona Channel is a grouted riprap sided channel that would not be impacted by the small increase in flows caused by this Project. The small increase in flows relative to those originating upstream is not expected to create pollution, contamination or nuisance as defined in Section 13050 of the CWC.

Potential dry-weather flows from the developed areas and off-site areas would be detained longer than wet-weather flows, resulting in even greater treatment. They are being employed to help sustain the Freshwater Wetlands System (Freshwater Marsh and Riparian Corridor) and, in fact, are considered a benefit to the system. Also, conservative irrigation practices and newer sewer systems are expected to minimize dry-weather flows from the Proposed Project areas.

Compliance with the Performance Criteria is an ongoing process as construction of the Freshwater Wetlands System is completed, and as habitat is established and maintained. The Freshwater Marsh System's Operations, Maintenance and Monitoring Manual (O&M Manual) serves as the primary vehicle, in accordance with which compliance with the Performance Criteria is taking place. The analyses presented herein above demonstrate that water quality of the Proposed Project will support the required habitat of the Freshwater Wetlands System and protect downstream receiving waters, thus satisfying the water quality aspects of the Performance Criteria and the associated permits and approvals. Verification of the water quality-related Performance Criteria will be documented through the annual reports submitted to the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), California Coastal Commission (CCC), and other agencies responsible for enforcement of the Performance Criteria.

Based on the numerical and narrative impact assessment, the Proposed Project is not expected to create pollution, contamination, or nuisance, as defined in Section 13050 of the CWC, or cause regulatory standards to be violated, as defined in the applicable NPDES Permit (MS4 Permit) or the Basin Plan, for the receiving waterbodies, and is expected to comply with the project-specific Performance Criteria resulting from the USACE 404 Permit and related agency actions. Mitigation measures are proposed below to require implementation of the Project Design Features which serve to eliminate potential significant impacts discussed above. Therefore, the impacts to surface waters are anticipated to be less than significant with the implementation of the Proposed Project.

### **Groundwater Quality Impacts**

The potential for the Proposed Project to result in groundwater contamination, modification of existing contaminant movement, or expansion of the contaminated area is analyzed in Section IV.I, Safety/Risk of Upset.

The Habitat Creation/Restoration Component does not involve the construction of any industrial development that would contribute to groundwater contamination within the Proposed Project site. The Riparian Corridor portion of the Habitat Creation/Restoration Component would collect stormwater runoff from the Proposed Project and off-site tributaries, which could contain pollutants typical of urban development. The Riparian Corridor could detain the stormwater resulting in percolation of the stormwater runoff into the groundwater. However, the upper portion of the Riparian Corridor would have a clay liner limiting percolation of surface runoff to the groundwater. In addition, the depth to Silverado Aquifer, which is the only aquifer at the site with beneficial uses, is 100 to 200 feet below ground surface. Therefore, development of the Habitat Creation/Restoration Component is not expected to result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion).

Given the relatively shallow depth to groundwater in the area of the Proposed Project, below-grade construction activities for the Urban Development Component could potentially encounter groundwater, thereby requiring dewatering during construction. In addition, long-term dewatering during operation of the Urban Development Component may be required for structures that would be constructed below the groundwater table surface, such as subterranean (underground) parking garages. The proposed permanent dewatering systems, which include dewatering for the methane safety system and dewatering of two-level subterranean parking garages (it would not be necessary for one-level subterranean garages), is a “contingent” system that would operate only if/as groundwater elevations occur at the level of the dewatering pipes. In case groundwater is present or in the future rises to an elevation above the elevation of the groundwater pipes, the water is conveyed to a sump where it is removed by automatic pumps. The dewatering system does not include dewatering by pumping from deep wells or any specific well points. Adverse impacts are not anticipated relative to the rate or change in the direction or movement of existing contaminants in groundwater from dewatering associated with operation of the 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 limited. Therefore, the dewatering pipes are not anticipated to draw water across any substantial distance, and impacts would be less than significant. To date, no effect on plume movement has been observed in relation to the operation of permanent dewatering systems anywhere within the adjacent Playa Vista First Phase Project site, and similar results are anticipated for such systems installed within the Proposed Project. See Section IV.A, Earth and Section IV.I, Safety/Risk of Upset, for further discussion of the potential impacts of dewatering on subsidence and groundwater contamination, respectively.

In addition, remediation would be conducted under the direction of the RWQCB, and the RWQCB would require that construction dewatering be conducted in a manner that does not negatively impact ongoing remediation nor exacerbate the extent of contamination. Remediation

at the nearby areas of Test Site 2 and the former industrial areas east of the Proposed Project site and within the adjacent Playa Vista First Phase Project would create an inward hydraulic gradient toward the treatment zone (i.e., away from the Proposed Project) and would also be conducted under the direction of the RWQCB. Due to the short-term nature of construction and dewatering activities, dewatering for the Habitat Creation/Restoration Component is not expected to significantly affect the rate or change the direction of movement of existing contaminants or expand the area affected by contaminants for the known contaminant areas beneath the Proposed Project Site, the former Test Site 2, and the former industrial sites east of the Project Site and within the adjacent Playa Vista First Phase Project.

The existing Stormwater Pollution Prevention Plan (SWPPP) enforced by the RWQCB would be updated and amended as appropriate to include Proposed Project construction activities and would be implemented throughout the duration of construction activities on the Proposed Project site. The RWQCB also has the authority to review the SWPPP at the site, declare the SWPPP and/or BMPs to be inadequate, to require an individual NPDES permit for the activity, and to initiate enforcement actions, if necessary. While the BMPs that would be included in the SWPPP are primarily aimed at minimizing the discharge of pollutants to surface receiving waters, the BMPs would also serve to minimize any short-term impacts on groundwater quality from construction activities. Any discharge of groundwater in conjunction with construction dewatering or operational dewatering for structures placed below grade for the Proposed Project would require compliance with the Project's General Construction Permit, an individual NPDES permit, or an appropriate industrial users discharge permit issued by the City of Los Angeles Department of Public Works, Bureau of Sanitation. Although construction of the Urban Development Component would reduce open space and increase the impervious areas of the site, resulting in reduced infiltration (see Section IV.C.(1), Hydrology), additional irrigation of added landscaped areas would offset the decrease, resulting in a net increase of approximately 6 acre-feet/year. This increase is considered positive, but negligible from a regional basin perspective, and is not expected to result in any measurable increase in local groundwater levels. Due to the short-term nature of construction and dewatering activities, implementation of applicable construction BMPs, compliance with NPDES requirements for dewatering discharges, and compliance with State Title 22 standards for recycled water quality, development of the Urban Development Component would not result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion). Therefore, a less-than-significant impact to groundwater quality would occur.

The Proposed Project would utilize recycled (reclaimed) water for irrigation and office toilet/cooling tower use, which may percolate to local groundwater units. However, such irrigation water must meet or exceed the State Title 22 standards for water quality. Any recycled water that would percolate into local groundwater units would be filtered through varying layers of earth, further enhancing its quality. In addition, the depth to the Silverado Aquifer, which is

the only aquifer at the site with beneficial uses, is 100 to 200 feet below ground surface, requiring the recycled irrigation water to percolate through earth and rock in order to reach an aquifer that is pumped for beneficial uses. The upper portion of the Riparian Corridor will have a clay liner further limiting percolation of surface runoff to the groundwater. Therefore, no impacts to groundwater quality from the use of recycled water are expected to occur.

With respect to other operational (long-term) groundwater quality impacts, no land uses (e.g., industrial development) would be permitted or are presently planned that could legally contribute to groundwater contamination within the Proposed Project site. Current state law would regulate the design, construction and operation of any land uses that might include storage of fuel in underground tanks.

Groundwater in the area of the Urban Development Component of the Proposed Project is not currently pumped for beneficial uses (i.e., drinking water, industrial or agricultural supply). Due to the distance of the Proposed Project from the nearest beneficial use wells, the fact that drinking water, industrial or agricultural supply wells would not be constructed as part of the Urban Development Component, and compliance with State Title 22 standards for recycled water quality, construction and operation of the Urban Development Component are not expected to cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Hence, a less-than-significant impact to groundwater quality would occur.

The nearest public water supply is 2 miles northwest of the Proposed Project, and the nearest irrigation well is located approximately 2 miles southeast of the Proposed Project. Due to the distance to these wells, the fact that no wells would be constructed as part of the Habitat Creation/Restoration Component, and the compliance with State Title 22 standards for recycled water quality, construction and operation of the Habitat Creation/Restoration Component are not expected to cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Surface water and groundwater water quality impacts resulting from implementation of the Project's Equivalency Program would be similar to those of the Proposed Project and would be less than significant, due to the similarity in construction activities, proposed land uses, and site characteristics. Additionally, water quality impacts resulting from construction of the Project's off-site improvements would be similar to those of the Proposed Project and would be temporary and less than significant. Operation of off-site improvements would result in negligible contributions of pollutants to surface waterbodies and/or groundwater basin(s), and impacts would be less than significant.

---

**b. Recommended Mitigation Measures****Mitigation Measures for the Proposed Project and the Equivalency Program**

Mitigation measures implemented for Hydrology will also reduce or avoid water quality impacts. (See Section IV.C.(1), of the EIR, for associated mitigation measures.)

- The Proposed Project shall incorporate the following features to reduce pollutant loadings, to the extent permissible by applicable codes:
  - Roof drain biofiltration systems to receive and filter runoff from all buildings within the Proposed Project;
  - Water quality catch basin inserts for all catch basins within the Proposed Project site where water is flowing to the Central Storm Drain;
  - A vegetated swale within a park adjacent to the Riparian Corridor to receive and filter low-flow runoff from the Proposed Project prior to entering the Riparian Corridor.
- Prior to issuance of a B-Permit or building permit for construction of the additional BMPs discussed above, as applicable, drawings and specifications of the proposed BMPs shall be submitted to the City of Los Angeles for review and comments. Such information shall include, but is not limited to, a site map showing locations of the proposed BMPs, product manufacturer, model number, and manufacturer's recommended maintenance schedule.
- The Proposed Project shall include on-site operation and maintenance programs designed to minimize environmental impacts including:
  - Only slow-release fertilizers that are applied directly to the soil shall be used to establish vegetation. No fertilizer shall be applied during or within 72 hours of a forecasted rain event. Erosion and sediment control measures shall be implemented during landscaping of the project to minimize the export of nutrients from the Proposed Project site.
  - The Proposed Project shall include the use of native or drought-resistant vegetation in no less than 50 percent of the community landscaped areas and an irrigation program that emphasizes no excess irrigation. Any non-native vegetation selected for landscaping shall be noninvasive.
  - The Proposed Project shall install trash racks at inlets to the Riparian Corridor.



- All multi-family buildings within the Proposed Project shall include trash collection and storage areas for residents, and managed trash collection areas for commercial businesses.
- The Master Homeowner’s Association shall provide tenants/residents with information to encourage compliance with good housekeeping practices, such as proper disposal of household and office hazardous waste; encourage tenants/residents not to plant exotic grasses or other plants whose seeds may potentially migrate off their properties via wind, rain, or animals; and to inform residents of the potential receiving waters impacts of excessive dry-weather runoff.
- Prior to issuance of any grading, building or B-Permit, the existing Playa Vista Stormwater Pollution Prevention Plan (SWPPP) shall be amended to include the Proposed Project. The SWPPP shall identify temporary Best Management Practices (BMPs) to be implemented in accordance with the General Construction Permit issued by the Regional Water Quality Control Board (RWQCB). BMP categories deployed during construction shall include contractor activities practices, waste management practices, soil stabilization (erosion control) practices, sediment control practices, roadway cleaning/tracking control practices, vehicles and equipment cleaning, concrete truck washout and fueling practices.

#### **Additional Mitigation Measures for the Off-Site Improvements**

- Construction contractor(s) selected for the proposed improvements shall be required, through contract specifications, to use grading and excavation techniques that control runoff from the off-site traffic improvements, as well as Best Management Practices (BMPs) to avoid/control erosion and sedimentation. The contractor(s) shall also be required to implement other BMPs appropriate for the nature, location, timing (relative to rainy season), and duration of proposed construction activities. Typical BMPs related to construction activities include the following:
  - Erosion and sediment controls, including soil stabilization, silt fence installation, and/or sandbag installation;
  - Wind erosion controls, such as using only the minimum amount of water to control dust without adding to runoff;
  - Tracking controls, such as construction vehicle egress management for sedimentation carried on vehicles leaving the site;
  - Spill prevention and control measures, such as regular inspections of vehicles for leaks, and prevention measures, such as oil pans under parked vehicles; and

- Concrete and construction materials management, such as the avoidance of fresh concrete washing unless runoff can be drained to a bermed or level area away from drain outlets or channels.
- Permanent BMPs shall be integrated into the design and operation of off-site improvements, as appropriate. Examples of such BMPs include street sweeping, catch basins, directing surface runoff into landscaped medians/strip, and other water quality treatment measures as feasible and appropriate.

### **c. Unavoidable Adverse Impacts**

With implementation of the mitigation measures, impacts to surface water quality would be less than significant, as the Proposed Project is not anticipated to create pollution, contamination or nuisance as defined in Section 13050 of the CWC or cause any applicable regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan (Basin Plan) for the receiving waterbodies, and as reflected in the Performance Criteria.

Impacts to groundwater quality would be less than significant, as the Proposed Project is not anticipated to affect the rate or movement direction of existing contaminants; expand the areas affected by contaminants; increase the level of groundwater contamination (including that from direct percolation, injection or saltwater intrusion); or cause regulatory water quality standards of existing production wells to be violated as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

### **d. Cumulative Impacts**

The majority of the off-site tributary area is already highly urbanized. The off-site tributary area includes the Proposed Project and the subset of related projects within the tributary area, which includes the adjacent Playa Vista First Phase Project, West Bluff project (Tentative Tract 51122), and the Loyola Marymount University expansion. Since these areas are already highly urbanized, other changes or development are not likely to cause substantial changes in regional surface water or groundwater quality. Predicted loads and concentrations in this analysis were based on the total tributary drainage area generating runoff using designated zoning/land uses. In fact, with redevelopment projects (with application of the SUSMP requirements as appropriate) and increases in system-wide controls associated with other elements of the MS4 Permit, it is anticipated over time, regional water quality may improve.

Additionally, related projects are unlikely to cause or increase groundwater contamination because existing statutes prohibit contamination of groundwater by existing and future land uses and also require remediation of existing contamination. The Proposed Project occupies less than 1 percent of the coastal plain hydrologic groundwater basin. As such and in light of the limited contribution from other projects and Proposed Project's control measures, the Proposed Project's contribution to surface water or groundwater quality impacts is not cumulatively considerable and, therefore, less than significant.

Cumulative impacts to surface water quality would be less than significant, as the Proposed Project is not anticipated to create pollution, contamination or nuisance as defined in Section 13050 of the CWC or cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan (Basin Plan) for the receiving waterbodies.

Cumulative impacts to groundwater quality would be less than significant, as the Proposed Project is not anticipated to affect the rate or direction of movement of existing contaminants; expand the areas affected by contaminants; increase the level of groundwater contamination (including that from direct percolation, injection or saltwater intrusion); or cause regulatory water quality standards of existing production wells to be violated as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## **5. BIOTIC RESOURCES**

### **a. Environmental Impacts**

The Proposed Project's Urban Development Component would introduce a developed community on 99.3 acres of the Proposed Project site, and a Habitat Creation/Restoration Component on the remaining 11.7 acres. The Project's Urban Development Component would result in a net loss of 60.9 acres of existing undeveloped area on the site. This undeveloped area has a long history of disturbance; in the past, the area has been developed with buildings, roads, parking areas, and a runway associated with the Hughes Industrial Complex. The Project's Habitat Creation/Restoration Component of the Project would result in a net gain of 10.2 acres of native habitat, a beneficial impact. Impacts of the Project relative to the six significance thresholds evaluated are as follows:

- **Federal and State Listed Threatened and Endangered Species.** No adverse impact would occur. No federal or state listed threatened or endangered species reside on the Project site or are dependent on the site's resources for survival. Restoration components of the Project have potential to attract listed species (e.g., least Bell's vireo, coastal California gnatcatcher) and therefore have the potential for a beneficial impact on such species.
- **Non-Listed Sensitive Species.** If construction occurs during nesting season, potentially significant short-term impacts on migrant birds may occur. 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 unlikely to affect long-term survival of species due to the restoration components of the Project and presence of more diverse foraging opportunities off-site in the nearby Ballona Wetlands. There is potential for long-term beneficial impacts on migrant birds and raptors due to the restoration components of the Project, which will increase the amount and diversity of native habitat on site in comparison to current conditions.
- **Locally Designated Species, Habitat, or Plant Community.** No impact on locally designated species would occur. Such species are absent from the Project site. Less-than-significant impact on off-site locally designated habitats/plant communities (Ballona Wetlands) would occur due to design features (including habitat restoration) of the Proposed Project.
- **Interference with Wildlife Movement/Migration Corridors.** No impact would occur to a wildlife movement corridor – the Project is surrounded by urban development and does not serve as a link between areas of core habitat for wildlife. However, the Habitat Creation/Restoration component has potential for a beneficial impact by expanding and linking existing habitats that are currently fragmented and degraded. The Riparian Corridor will link two segments of the riparian corridor that will be established as part of the adjacent Playa Vista First Phase Project. This linkage will result in an extended movement corridor for wildlife through the Project site. Similarly, the proposed Bluff Restoration element will link existing stands of revegetated coastal sage scrub along the bluffs so as to provide a continuous expanse of native upland habitat from Lincoln Boulevard east to Centinela Avenue.
- **Alteration of Existing Wetland Habitat.** Project impacts would be less than significant. There are no on-site wetlands beyond those previously permitted for fill that would be impacted by the Project. Potential impacts to off-site wetlands from pollutants in stormwater runoff and irrigation runoff would be less than significant due to treatment measures built into the Project design, the Riparian Corridor and the Freshwater Marsh.

- **Interference with Habitat/Species Behavior (Indirect Impacts).** Project impacts would be less than significant. The Project site is already located within an urban environment, and sensitive species that utilize the Ballona Wetlands do so in the presence of busy streets and lighting. In the future, sensitive species may also be attracted to the Habitat Creation/Restoration Component of the Project. Lighting, noise, and intrusion by humans and pets from the adjacent mixed-use development may limit use of the restored habitats by sensitive species although such factors would not be expected to diminish long-term chances for survival of the species.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The following measures shall be implemented to avoid or minimize potential impacts on biological resources:

#### **Construction Measures**

- Prior to any earthmoving activities during the breeding and nesting season, the Applicant shall have a field survey conducted by a qualified biologist to determine if active nests of breeding birds are present within the area of potential influence of the activity. This area of influence shall include the nest site as well as an appropriate buffer determined by the biologist based on field observations and the biology of the species. This survey shall be conducted within three (3) days before the clearing/grubbing. If nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code are found, the breeding/nesting area(s) shall be protected according to the biologist's recommendations that include, but are not limited to, a suitable buffer area around the nest, which shall not be disturbed until the young have fledged.

#### **Increased Non-Native Plant Species**

- Prior to issuance of any building permit, landscape guidelines shall be prepared by a licensed landscape architect in consultation with a qualified biologist for review and approval by the City Planning or Public Works department, if applicable. The plan shall identify non-native plants that are potentially invasive and that shall be prohibited.

These planting guidelines shall be provided to all new business owners and residents in the Project site prior to the close of escrow and executed lease agreements. Planting guidelines shall be monitored by a licensed landscape architect.

Disposal of cuttings of any ornamental plants during Project operation in on-site or off-site open space areas shall be strictly prohibited.

- Plants that might be invasive or that might interbreed with native plants in nearby restoration areas shall be avoided in the parkway landscaping along the Bluff Creek Drive.

### **Bluff Restoration**

- Concurrent with the construction of the adjacent Riparian Corridor, the bluff area within the Habitat Creation/Restoration Component shall be restored as coastal sage scrub habitat, in accordance with the Bluff Restoration Plan and specific success criteria, maintenance provisions and monitoring requirements contained in Attachment B of the MMRP.

### **Light and Glare/Noise**

- Night lighting within 100 feet of restored habitat areas (riparian areas and bluffs) shall be directed onto the property and away from the habitat area. Such lighting shall be downcast luminaries with light patterns directed away from natural areas, and shall be coordinated with the lighting engineer and the environmental and biological resource monitor.
- Landscaping along the south side of Bluff Creek Drive adjacent to the habitat area shall incorporate non-invasive plant materials that will reduce the potential for intrusion of vehicle headlight glare and buffer traffic noise into the Riparian Corridor.

### **Intrusions into Habitat Areas by Humans and Pets**

- The riparian corridor shall be fenced along the northern side and at strategic locations to discourage access into the habitat area.
- Signs shall be placed along recreational trails in proximity to the Habitat Creation/Restoration Component to inform users of the proximity of the trail to sensitive habitat areas. Signs shall list rules and regulations for trail use designed to protect sensitive biological resources. Rules shall include, but not be limited to, the following: no access to off-trail areas; no excessively loud voices or other noise disturbances; no harassment of wildlife; no domestic pets; no “taking” of plants and animals; and strict adherence to trail boundaries.

### **c. Unavoidable Adverse Impacts**

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. Development of the Urban Development Component for both the Proposed Project and the Equivalency Program would result in a net loss of 60.9 acres of existing undeveloped area on the site. This undeveloped area has a long history of disturbance; in the past, the area has been developed with buildings, roads, parking areas, and a runway associated with the Hughes Industrial Complex. Currently this area is used on an ongoing basis to stockpile soil and crushed rock; provide a recycling site for construction materials; stage construction equipment, materials and personnel; and provide for temporary stormwater detention. However, this highly disturbed area still provides foraging opportunities for raptors and some marginal nesting habitat for common migrant birds. Loss of undeveloped area due to the Urban Development Component would be an unavoidable impact of the Project, but unlikely to affect long-term survival of species due to the restoration components of the Project and presence of more diverse foraging opportunities off site in the nearby Ballona Wetlands. It is concluded that while unavoidable adverse impacts on foraging raptors and nesting common migrant birds may occur due to loss of undeveloped area, these impacts will be less than significant. These conclusions are inclusive of the Project's Equivalency Program, and the construction of the Project's off-site improvements.

### **d. Cumulative Impacts**

The Urban Development Component of the Proposed Project would incrementally reduce the total amount of undeveloped area in the region by about 60.9 acres. Without the Habitat Creation/Restoration Component of the Project, the loss of 60.9 acres of undeveloped area, in combination with the loss of undeveloped area resulting other related projects, would constitute a substantial loss of undeveloped area in the Project region. However, the Habitat Creation/Restoration Component of the Proposed Project (inclusive of the Equivalency Program) would increase the total amount of native habitat in the region by about 10.2 acres, in addition to the 44.4 acres of habitat restoration (Freshwater Marsh and First Phase Riparian Corridor) that are under construction as part of the Playa Vista First Phase Project. Evaluated as a whole in combination with other known development projects in the area, with consideration of design components that will reduce pollutant levels in comparison to existing conditions, and with consideration that the Habitat Creation/Restoration Component of the Project will establish better quality, more diverse native habitat than presently occurs, it is anticipated that cumulative impacts of the Proposed Project, inclusive of the Equivalency Program and construction of the Project's off-site improvements, on biological resources will be less than significant.

## 6. NOISE

### a. Environmental Impacts

Development of the Proposed Project would require site preparation (i.e., grading and infrastructure construction) within both the Urban Development and Habitat Creation/Restoration Components and the construction of proposed structures within the Project's Urban Development Component. These activities typically involve the use of heavy equipment, such as tractors, loaders, concrete mixers, cranes, etc. Pile drivers would be used in the construction of several Project structures within the Project's Urban Development Component. Grading and infrastructure noise levels would be greater than 5 dB(A) at locations along the edge of the Westchester Bluffs (e.g., LMU and adjoining residences), the apartment buildings located on the north side of Jefferson Boulevard, west of Centinela Avenue, and at Playa del Rey Elementary School. As Project construction activities would exceed ambient exterior noise levels by 5 dBA or more at a noise sensitive use, Project construction impacts are concluded to be significant.

Project operations would generate potential noise impacts to off-site locations. The most meaningful assessment of the Project's operational noise impacts is one that considers the combined effect of the Project's traffic and stationary (e.g., heating, ventilating and cooling equipment) noise sources. The Proposed Project's combined noise sources would increase noise levels at the analyzed off-site locations by up to 1.9 db(A) CNEL. This level of noise increase would not exceed the operational thresholds of significance and are not considered significant. With regard to future on-site uses, the on-site residential land uses located south of Jefferson Boulevard, and north of Bluff Creek Drive would be exposed to noise levels that exceed the 65 dB(A) CNEL "normally acceptable" Land Use Compatibility Guideline for multi-family residential noise utilized by the City. This would be a significant impact without mitigation. As part of the adjacent Playa Vista First Phase Project, up to two small helistops may be located east of the Project site. No on-site uses would be exposed to noise levels that exceed the 65 dB(A) CNEL "normally acceptable" Land Use Compatibility Guideline for multi-family residential uses nor the 70 dB(A) CNEL "normally acceptable" Land Use Compatibility Guideline for office and commercial uses under either operations scenario. Therefore, helicopter noise would not cause a significant impact to on-site uses.



---

**b. Recommended Mitigation Measures****Construction Noise****Mitigation Measure for the Proposed Project and the Equivalency Program**

- Prior to the issuance of any grading, excavation, foundation, or building permits, the Applicant shall provide proof satisfactory to the Advisory Agency that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7 A.M. and 6 P.M., Monday through Friday, and 8 A.M. and 6 P.M. on Saturday, and that a noise management plan for compliance and verification has been prepared by a monitor retained by the Applicant. At a minimum, the plan shall include the following requirements:
  - Pile drivers used in proximity to sensitive receptors shall be equipped with noise control having a minimum quieting factor of 10 dB(A);
  - Loading and staging areas must be located on site and away from the most noise-sensitive uses surrounding the site as determined by the Advisory Agency;
  - Program to maintain all sound-reducing devices and restrictions throughout the construction phases;
  - An approved haul route authorization that avoids noise-sensitive land uses to the maximum extent feasible; and
  - Identification of the noise statutes compliance/verification monitor, including his/her qualifications and telephone number(s).
- Prior to the issuance of the first grading permit, the Applicant shall submit to the City of Los Angeles Planning Department a construction noise management plan relative to Playa del Rey School. The plan shall set forth the process for the notification to the Playa del Rey School of any construction activities which may affect the school, and noise management measures to be undertaken when construction noise levels are projected to be or are greater than 5 dBA over ambient exterior conditions, or by more than 3 dBA in the event the ambient noise level at Playa del Rey School exceeds 67 dBA. Noise management measures may include one or more of the following: temporary sound barriers (e.g., plywood fences, sound blankets, earthen berms), pile driver acoustical shields, residential grade mufflers, construction activity limitation during noise-sensitive time periods, and reduced heavy equipment operation within close proximity of the Playa del Rey School.

---

### **Additional Construction Mitigation Measures for the Off-Site Improvements**

- All construction and demolition activity located within 500 feet of a residence shall occur between 7 A.M. and 6 P.M., Monday through Friday, and 8 A.M. and 6 P.M. on Saturday.
- Contractors shall ensure that construction equipment is fitted with modern sound-reduction equipment.
- When construction operations occur adjacent to occupied residential areas, the contractor shall implement all technically feasible mitigation measures, pursuant to the LAMC, that include, but are not limited to, changing the location of stationary construction equipment, shutting off idling equipment, notifying adjacent residences in advance of construction work, and installing temporary acoustic barriers around stationary construction noise sources.
- Haul routes that avoid noise-sensitive land uses shall be utilized to the maximum extent feasible.

### **Operational Noise**

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Construct all exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Jefferson Boulevard and Bluff Creek with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the American Standard Task Methods E90 and E413. The subdivider, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the Advisory Agency which achieves a maximum interior noise of CNEL 45 (Residential).
- All HVAC and related roof-top mechanical equipment shall be installed in accordance with the City of Los Angeles Noise Ordinance, as applicable. Prior to issuance of temporary or permanent certificates of occupancy for each building, an acoustical inspection shall be performed for each building to ensure building compliance with applicable interior and exterior noise criteria as specified by the City of Los Angeles Noise Ordinance.

### **c. Unavoidable Adverse Impacts**

The mitigation measures recommended in this section would reduce the noise levels associated with grading and construction activities attributable to the Project, Equivalency Program, and the identified off-site improvements to some extent. However, these activities would continue to substantially increase the daytime noise levels at nearby noise-sensitive uses by more than 5.0 dB(A)  $L_{eq}$ . This would be considered a significant and unavoidable short-term impact when grading and construction activities associated with the Project, Equivalency Program or the off-site improvements occur near noise sensitive uses.

The mitigation measures recommended in this section would ensure that roadway and HVAC noise at the Project site would meet adopted City standards. No significant impacts associated with helicopter noise, and off-site traffic noise and composite noise levels would occur. This conclusion applies to the Project, Equivalency Program and the construction of the Project's off-site improvements.

### **d. Cumulative Impacts**

Cumulative construction noise impacts occur when one or more related projects or the Project's off-site traffic improvements, are located in close proximity to the Project site. Construction activities occurring at related projects and off-site improvements that do not meet this criterion would be located sufficiently distant to the Project site so as to not contribute to a cumulative effect. The only related project that meets the criterion for potential cumulative impacts is the adjacent Playa Vista First Phase Project, assuming that construction of this related project is not completed before start of Proposed Project construction. In the event that construction of the Proposed Project, inclusive of the Equivalency Program, is occurring concurrently with construction of the adjacent Playa Vista First Phase Project, cumulative impacts would be significant because Proposed Project impacts are significant unto themselves and Playa Vista First Phase Project construction would generate construction noise levels that are comparable to those generated by the Proposed Project.

Cumulative noise impacts would also occur as a result of increased traffic on local roadways due to the Proposed Project, inclusive of the Equivalency Program, and other developments in the Project study area. The implementation of the Project's off-site improvements would not affect traffic volumes or travel speeds and thus would not contribute to any cumulative impact during Project operations.

The increase in noise levels at the study-area receptors would range from 0.3 to 5.3 dB(A) CNEL. Noticeable increases of 3.0 dB(A) or more would occur on the portions of the LMU campus located along the top edge of the Westchester Bluffs. The noise level increases at

all other locations would be less than 3.0 dB(A) and would not exceed the operational thresholds of significance. Therefore, the Proposed Project, inclusive of the Equivalency Program, and the development of the related projects would result in a significant cumulative mobile source noise impact.

As the Proposed Project does not involve any helicopter facilities, other than those required by the Los Angeles Municipal Code for emergency purposes, cumulative noise impacts from helicopter operations would not occur. With regard to stationary noise sources (e.g., HVAC equipment), each related project would be required to comply with the provisions of the Los Angeles Municipal Code. Given the stringent noise limitations set forth in the Los Angeles Municipal Code, cumulative stationary source noise impacts would be less than significant as cumulative noise levels from this particular noise source would be below ambient noise levels and therefore would not be discernible in the context of the community noise environment. Cumulative composite noise impacts would be the same, and thus significant, as those generated by cumulative mobile sources, as described above, since this would be the dominant noise source in the area. Based on these analyses, development of the Proposed Project, inclusive of the Equivalency Program and the identified off-site improvements, in conjunction with the development of the identified related projects would result in significant cumulative noise impacts.

## **7. NATURAL LIGHT – SHADING**

### **a. Environmental Impacts**

The Proposed Project would introduce new buildings on the Project site that could cause off-site shading. The only sensitive use that could be affected would be the apartment buildings on Jefferson Boulevard, across the street from the Project site. Shading at other off-site sensitive uses would be limited due to their elevation or distance. There would be no shading of the existing residential buildings during the equinox or summer seasons, and a maximum of 1.5 hours of shading on during the winter mornings. This level of the shading would be less than that allowed under the significance thresholds: 4 hours of shading between 9 A.M. and 5 P.M. between early April to late October, 3 hours of shading between the hours of 9 A.M. to 3 P.M. between late October and early April, and no shading at the equinox.

### **b. Recommended Mitigation Measures**

The Proposed Project would not result in a significant impact; therefore, mitigation measures are not required or recommended for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

### **c. Unavoidable Adverse Impacts**

Proposed Project shading on off-site shadow sensitive uses would be limited. There would be no shading of existing residential buildings during the equinox or summer seasons, and a maximum of 1.5 hours of shading on two specific apartment complexes across Jefferson Boulevard during the winter mornings. This level of the shading would be less than that allowed under the significance thresholds. No other existing shadow sensitive areas which rely on sun for their activities would be impacted.

### **d. Cumulative Impacts**

Shading impacts are extremely localized in nature. Unless two Projects stand sufficiently near to each other, they cannot cause shadows to fall on the same sensitive use. Thus, possibilities for impacts which are singularly non-significant, but cumulatively significant, are limited.

New related projects in the areas surrounding the Proposed Project site could potentially generate their own significant shading impacts on their nearby uses. The adjacent Playa Vista First Phase Project, would increase the amount of shading on off-site uses. The main effect of this shading would be on thoroughfares through the area. The portions of Jefferson Boulevard subject to shading would be cumulatively greater than with either project alone. However, this road is not considered a shadow sensitive use. There are no shadow sensitive uses which would be subject to cumulative impacts, and therefore no significant cumulative shading affects are anticipated to occur.

## **8. ARTIFICIAL LIGHT AND GLARE**

### **a. Environmental Impacts**

#### **Impacts from Artificial Lighting**

The Proposed Project would add night-time lighting to the Proposed Project site, infilling a currently vacant area that is surrounded with urban/suburban development containing typical nighttime lighting. The Proposed Project would not alter the general ambient lighting characteristics of off-site neighborhoods. The night-time appearance of the Project site would be altered with additional lighting that would be similar in nature to or less than some commercial uses in the Project vicinity.

The Proposed Project would may have some directed on-site lighting. Directed lighting to off-site sensitive uses would be an adverse impact. The City has, for many years, routinely required shielding of outdoor lighting to preclude glare impact to off-site properties. The City has also adopted specific lighting requirements in its Municipal Code to limit adverse impacts from artificial lighting. Notwithstanding, further mitigation measures are proposed to limit the effects of directed-lighting.

Effects of lighting on habitat areas (e.g., the riparian corridor and bluffs) is discussed further in the Biological Resource Sections of the EIR, which also includes a pertinent related mitigation measure.

### **Impacts from Glare**

Development associated with the Project is anticipated to use building materials which are typical of those used throughout the area and which are low-reflective in nature. Further, the view from the area most prone to glare effects, Jefferson Boulevard would be located at lower elevations than the Proposed Project buildings and would offer views of landscaped areas and slopes. Therefore, adverse impacts are not expected. However, since there are no binding requirements on the Proposed Project to preclude potential impacts from glare, impacts are considered potentially significant, and mitigation measures are recommended below to preclude the generation of such impacts.

### **b. Recommended Mitigation Measures**

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The following mitigation measures protect human population and activity. An additional measure to protect habitat areas is included in Section IV.D, Biotic Resources.

With regard to artificial lighting:

- All outdoor lighting for individual buildings, other than signs, shall be limited to those required for safety, security, low level exterior architectural illumination, and landscaping, except for temporary special events.
- Animated building identification signs shall be prohibited. Illuminated residential building signs shall not be permitted above the first level.

With regard to glare:

- The Applicant shall use exterior building materials and facades which eliminate or minimize highly reflective materials. At the time of plan check review for specific development projects, building materials shall be reviewed to assure that they do not exceed the reflectivity of standard building materials. If the Applicant should desire to use more reflective materials in locations isolated from major thoroughfares, adequate analysis must be presented to the Department of City Planning to determine that the building, due to location, would not cause glare impacts on motorists or nearby population.

### **c. Unavoidable Adverse Impacts**

The Proposed Project and its Equivalency Program would add lighting to the Project site that would be noticeable from off-site locations. Such lighting would be similar to lighting in adjoining areas. It would not substantially alter the lighting character of off-site areas surrounding the Project site, and would not be directed off-site in a manner which would interfere with the performance of off-site activity. Furthermore, the Proposed Project, inclusive of the Equivalency Program and off-site improvements, would not be expected to generate off-site reflective glare, so as to interfere with the performance of an off-site activity. Therefore, no significant impacts are expected after mitigation.

### **d. Cumulative Impacts**

Lighting from the Proposed Project, in conjunction with lighting associated with related projects, would contribute to the general level of ambient lighting surrounding the Project site. However, existing lighting already establishes a suburban-to-urban level of lighting condition baseline, and new sources would not significantly alter the nighttime appearance of the surrounding area. The Proposed Project would not create nighttime glare that would interfere with off-site activities, and there are no related projects that would contribute with the Proposed Project to an off-site interference of an activity. Cumulative impacts regarding nighttime illumination, inclusive of the Proposed Project, its Equivalency Program, and its off-site improvements, would be less than significant.

Glare impacts occur on a project-by-project basis. The Proposed Project is not expected to create daytime glare that would interfere with the performance of off-site activities and there are no related projects the would contribute with the Proposed Project to such an effect. Therefore, no significant cumulative impacts are anticipated from glare, inclusive of the Proposed Project, its Equivalency Program, and its off-site improvements.

## 9. LAND USE

### a. Environmental Impacts

Land Use impacts of the Proposed Project were considered in relationship to regulatory framework under which the Proposed Project would be developed and in relationship to the surrounding uses.

The Proposed Project would be implemented via amendments to the existing Specific Plan and its zoning designations, establishing new boundaries for R4(PV) and C2(PV) zone areas in place of existing R4(PV) and M(PV) zone areas. The Specific Plan amendment and zone changes would enable the Project's proposed development of housing uses in place of office, retail, and hotel uses allowed under the existing Specific Plan. The exchange is offered in the context of the overall planning concept for the Proposed Project. Implementation of the Urban Development Component 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, and impacts regarding the regulatory framework would be less than significant. Development of the Proposed Project would support policies for mixed-use, clustered development, enhancement of jobs/housing balance, efficient provision of infrastructure, and emphasis of public transit and non-motorized transportation. Further, the Proposed Project would support such activity at a location identified for such uses in existing plans.

Implementation of the Urban Development Component would not disrupt, divide, or isolate any existing neighborhoods, communities or land uses, and impacts regarding the relationship to existing uses would be less than significant. The Proposed Project would integrate with and provide continuity with development between the portions of the Playa Vista First Phase Project lying to the east and west of the Proposed Project site. Existing development to the south of the Project site, is located atop the bluffs, and would not have its physical arrangement affected by the Proposed Project. Project height limits restrict development to a level well below the average height of the bluffs creating a distinct separation between neighborhoods. The Project would not alter the character or distribution of uses to the north of the Proposed Project. Further, the Proposed Project would support a clustered development allowing for growth outside of existing localized neighborhoods.

Implementation of the Habitat Creation/Restoration Component would provide an environmental enhancement and neighborhood amenity. This Project Component is compatible with existing land use regulations and would not have a significant impact on the regulatory framework. The Habitat Creation/Restoration Component would enhance an existing buffer area and would not disrupt, divide, or isolate any existing neighborhoods, communities, or land uses. Impacts regarding the relationship to surrounding uses would be less than significant.



**b. Recommended Mitigation Measures****Mitigation Measure for the Proposed Project and the Equivalency Program****Land Use:**

- Prior to recordation of the tract map, the Proposed Project development standards and guidelines shall be incorporated as tract map conditions including, but not limited to, building height, setbacks, lot coverage, density, and land uses, as analyzed in ENV-2002-6129-EIR. Any changes shall be subject to additional environmental review and implementation of proper mitigation measures if additional impacts associated with such changes are identified.
- Lot 113 of VTTM 49104 shall remain as open space unless the Advisory Agency determines that this lot is not needed to meet the open space requirements of VTTM 49104.

**Additional Mitigation Measure for the Off-Site Improvements**

- Any private property that is affected during the construction of off-site improvements shall be restored to be consistent with conditions prior to construction, to the extent feasible.

**c. Unavoidable Adverse Impacts**

The Proposed Project, inclusive of the Equivalency Program, would be implemented via amendments to the existing Specific Plan and its zoning designations, establishing new boundaries for R4(PV) and C2(PV) zone areas in place of existing R4(PV) and M(PV) zone areas. The Specific Plan amendment and zone changes would enable the Project's proposed development of housing uses in place of office, retail, and hotel uses allowed under the existing Specific Plan. The exchange is offered in the context of the overall planning concept for the Proposed Project. The Proposed Project would provide development that is compatible with the land use/density designation in the Community Plan and Specific Plan, and the policies, goals and objectives of applicable plans and would therefore be compatible with the regulatory framework. The Proposed Project (inclusive of the Equivalency Program and the Project's off-site improvements) would not disrupt, divide or isolate any existing neighborhoods, communities, or land uses. Land Use Impacts would be less than significant.

## **d. Cumulative Impacts**

### **Regulatory Framework**

The Westchester-Playa del Rey Plan, the community plan in which the Proposed Project is located, is currently being updated under the City's Community Plan Update (CPU) Program. It is anticipated that the plan update will address growth in the area and address land use issues. The only known related project which would likely require an amendment to this plan is the proposed expansion of LAX. The City of Los Angeles is currently considering various alternatives for extensive improvements at LAX, as envisioned to occur within the context of a proposed LAX Master Plan. Other future Plan amendments would not preclude, nor be precluded by the Proposed Project's Plan amendments. The Proposed Project, inclusive of the Equivalency Program and the Project's off-site improvements, would be compatible with the regulatory framework and therefore would not contribute to a significant cumulative impact regarding regulations. It is anticipated that other development would be consistent with applicable regulations and the updated Community Plan, or would amend the plan through appropriate review and CEQA analysis as required by law. Cumulative impacts regarding the regulatory framework would be less than significant.

### **Relationship to Existing Uses**

Other development from related projects, in conjunction with the Proposed Project, would contribute to the general development character of the West Los Angeles region. In a general sense, the West Los Angeles region, including the immediate vicinity of the Project site, is predominantly developed. While some intensification of activity is occurring due to infill on the remaining undeveloped land parcels, and conversion to more intense uses on a parcel by parcel basis, the basic land use character, and major distribution patterns of the region have been established, and would not be altered by cumulative development. Intensification of development will have cumulative impacts on particular environmental issues such as traffic, noise, and air pollution. Such impacts are the focus of other sections of the EIR that address cumulative impacts associated with the Proposed Project.

One related project, the Playa Vista First Phase Project, is currently under construction. Future Playa Vista First Phase development will be consistent with the previously approved plan, and the existing/under development uses on the First Phase site. The Playa Vista First Phase Project and Proposed Project would form a unified development pattern with a continuity of uses – a cluster of development within the area bounded by the bluffs on the south, Lincoln Boulevard on the west, Jefferson Boulevard on the north, and Centinela Avenue on the east. The Proposed Project (inclusive of the Equivalency Program and the Project's off-site improvements) in conjunction with related projects would not disrupt, divide or isolate existing neighborhoods,

communities, or land uses. Cumulative impacts on land use compatibility would be less than significant.

## **10. MINERAL RESOURCES**

### **a. Environmental Impacts**

The Proposed Project is not located in a MRZ-2 area or other known or potential mineral resource area, including those noted in the Conservation Element as being of local importance, and would not result in loss of access to any such mineral resource area. As such, a less than significant impact would occur with implementation of the Proposed Project.

### **b. Recommended Mitigation Measures**

No significant impacts are expected relative to mineral resources; hence, no mitigation measures are required for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

### **c. Unavoidable Adverse Impacts**

Implementation of the Proposed Project would not result in any significant impacts relative to mineral resources. The Proposed Project would not result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 area, or other known or potential mineral resource area, including those noted in the Conservation Element as being of local importance. Therefore, no mitigation measures are required. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

### **d. Cumulative Impacts**

Based on the fact that there are no MRZ-2 areas, or other known or potential mineral resource areas, including those noted in the Conservation Element as being of local importance in or near the Proposed Project site, implementation of the Proposed Project in conjunction with all related projects would not result in a permanent loss of, or loss of access to, mineral resources within such areas.

With respect to off-site mineral resources (e.g., sand and gravel, and petroleum), the consumption of such resources for the construction of other projects in the local vicinity is expected to be typical of new development, as provided for by the building materials and

transportation fuels industries. The consumption of natural resources associated with the Proposed Project is relatively small, compared to the overall amount of resources that the market provides.

Overall, the Proposed Project in conjunction with the related projects is not anticipated to have a significant cumulative impact to a mineral resource that is located in a MRZ-2 area, or other known or potential mineral resource area and there are no mineral resources at or near the Proposed Project site that are noted in the Conservation Element as being of local importance. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## 11. SAFETY/RISK OF UPSET

### a. Environmental Impacts

#### **Hazardous Materials Management**

**Construction:** The demolition and removal of Buildings 22 and 45, and the various other sheds and storage buildings in the former Salvage Yard Area, would include the removal and disposal of asbestos-containing materials and/or lead-based paint. Abatement activities would be preceded by the completion of a work plan, and would be conducted in accordance with all applicable federal, state, and local regulations. As such, the construction of the Proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, and impacts would be less than significant.

**Operations:** The operation of certain uses allowed within the Proposed Project site and vicinity may involve hazardous materials and wastes. However, compliance with applicable federal, state, and local requirements would serve to minimize the health and safety risks to people or structures associated with such uses and materials/wastes within the Proposed Project site. Therefore, the Proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, and impacts would be less than significant.

#### **Soil/Groundwater Contamination**

**Construction:** The demolition and removal of Buildings 22 and 45, and the other various sheds and small storage buildings in the former Salvage Yard Area, would expose

underlying soils that were previously inaccessible for evaluation. There is the potential for site grading to encounter contaminated soil; however, compliance with the requirements of the Occupational Safety and Health Administration (OSHA) Safety and Health Regulations for Construction (29 CFR Part 1926) would serve to avoid exposure of workers or the public to hazards in excess of regulatory standards. Consequently, construction of the Proposed Project would not expose people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, resulting in a less-than-significant impact.

Construction-related dewatering could encounter contaminated groundwater, particularly along the southern portion of the Proposed Project site. Compliance with the requirements of the OSHA Safety and Health Regulations for Construction (29 CFR Part 1926) would serve to avoid exposure of workers or the public to hazards in excess of regulatory standards. Therefore, the Proposed Project would not expose people to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, and impacts would be less than significant.

Areas of known contamination have been identified and evaluated, and remediation options will be proposed in accordance with the Regional Water Quality Control Board's (RWQCB) Cleanup and Abatement Order (CAO) No. 98-125; however, it is possible that previously unknown areas of contamination may be encountered during project grading activities. Any such hazardous materials/wastes uncovered by construction activities are required by existing statutes to be removed or otherwise managed, such that impacts relating to human exposure would be reduced to levels acceptable to federal, state, and local regulatory agencies. Therefore, the Proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards, and impacts would be less than significant.

**Operations:** The potential for safety/risk of upset impacts that may occur in conjunction with implementing various remediation options at the majority, if not all, of the areas of concern would have no significant aboveground impacts and only beneficial subsurface impacts. The release of the treated by-products is regulated by, and is subject to the permitting authority of, the South Coast Air Quality Management District (SCAQMD Rules 1401 [New Source Review of Carcinogenic Air Contaminants] and 1402 [Control of Toxic Air Contaminants from Existing Sources]). The design and operation of remediation systems will include safety provisions in accordance with accepted professional practices, and inspection of the system is within the purview of Cal/OSHA. The option of soil excavation, retrieval, and off-site disposal may result in temporary on-site impacts such as dust, equipment noise, and truck travel. Impacts associated with truck travel would extend off-site as well. Potential human health impacts associated with the soil vapors from exposed soils and from dust during excavation and loading would be

minimized through compliance with Rule 1166 of the SCAQMD Rules and Regulations (potential impacts associated with dust generation are discussed in Section IV.B, Air Quality). It is anticipated that remediation of contaminated areas within the Proposed Project site can be successfully accomplished using options other than soil excavation and off-site disposal (e.g., in-situ remediation technologies). However, if excavation is the preferred remedial option, it would be carried out in accordance with Rule 1166. As such, remediated areas would pose no health risk to residents and employees on-site during Project operation. Impacts would be less than significant, because the Proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

### **Soil Gas**

**Construction:** Soil gas surveys conducted in 1999 and 2000 found some sampling locations with elevated methane concentrations, and only very low, if any, concentrations of hydrogen sulfide and BTEX at the Proposed Project site. As such, grading or construction activities occurring within confined spaces on-site could pose a potential for soil gas build-up, resulting in a possible safety/risk of upset impact. Adherence to the construction safety measures, as well as compliance with Cal/OSHA safety requirements would serve to avoid substantial risk in the event that elevated levels of these soil gases are encountered during grading and construction. Based on such monitoring and safety provisions, grading and construction activities associated with development on-site are not expected to substantially expose workers or nearby residents to elevated levels of methane or other soil gases. Therefore, impacts would be less than significant, since the Proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards.

**Operations:** Future uses proposed in the subject area generally include Community Serving, Open Space, Residential, and Mixed-Use, as well as new roadways. Development in such areas poses the potential to expose Project occupants to elevated levels of methane or other soil gases; however, the City of Los Angeles Department of Building and Safety (LADBS) would require a methane safety program, which would provide appropriate safety measures in the design, construction, and long-term operation of such development. A soil gas report will be required for each development project to address the methane characteristics specific to the development site and identify the appropriate applicable methane safety requirements. As such, implementation of a methane safety program would provide a substantial level of safety for Project occupants throughout the operation of the Proposed Project. As such, with implementation of appropriate mitigation measures, the Proposed Project would not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, and impacts would be less than significant.

In addition to the potential impacts described above related to new buildings, the installation of subsurface utility improvements, such as underground utility vaults and underground utility line corridors that have gravel beds, could pose potential safety/risk of upset impacts. These potential impacts can be reduced to a level less than significant through measures similar to those described above for buildings and, for utility corridors, through the use of bentonite plugs.

With respect to hydrogen sulfide and BTEX, only very low, if any, concentrations were found to occur on-site and are not considered to pose a significant safety/risk of upset hazard for long-term operation of uses within the Proposed Project.

### **Aviation Hazards**

Based on proposed flight paths for subject heliports and proposed building heights on-site, impacts relative to aviation hazards from operation of the subject heliports would be less than significant, as the Proposed Project would be designed not to interfere with, or expose people or structures to substantial risk from, heliport flight operations.

Safety/Risk of Upset impacts resulting from implementation of the Project's Equivalency Program would be similar to those of the Proposed Project and would be less than significant, due to the similarity in construction activities, proposed land uses, and site characteristics. Additionally, impacts resulting from implementation of the Project's off-site improvements, though the improvements would occur at various locations within the Project vicinity, would be reduced relative to those of the Proposed Project and would be less than significant.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

#### **Hazardous Materials Management**

- Prior to issuance of demolition permits for Buildings 22, 45, and other sheds and small storage buildings, evidence shall be provided to the City of Los Angeles Department of Building and Safety that the demolition contract provides for a qualified asbestos and lead based paint removal contractor/specialist to remove or otherwise abate asbestos and lead based paint prior to or during demolition activities in accordance with federal, state, and local regulations.
- Prior to issuance of demolition permits for Buildings 22, 45, and other sheds and small storage buildings, evidence shall be provided to the City of Los Angeles

Department of Building and Safety that the demolition contract provides continuous compliance with all applicable government regulations and conditions related to hazardous materials and wastes management.

### **Soil/Groundwater Contamination**

- Any contaminated soil, groundwater and/or toxic materials removed during remediation activities or discovered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ (in-place), or otherwise managed in accordance with the RWQCB requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented so as to render the area suitable for grading activities to resume.
- To address the potential that VOC-contaminated soils, groundwater, and/or other materials may be encountered during excavation and grading, the applicant contractor(s) selected for excavation and grading work shall maintain a valid South Coast Air Quality Management District (SCAQMD) Rule 1166 permit plan (i.e., approval of a Contaminated Soil Mitigation Plan) for areas of known or suspected contamination, and be prepared to control nuisance odors per SCAQMD Rules and Regulations.
- Any contaminated soils stockpiled at the site shall be stored in such a manner that underlying soils are not cross-contaminated. This could be accomplished by the use of heavy-duty plastic sheeting placed under and on top of the stockpiled materials, or other suitable methods. The management, treatment, or disposal of such material shall comply with all federal, state, and local regulations related to hazardous waste.
- All stockpiled contaminated materials shall be protected in order to prevent material from being washed into storm drains. This could be accomplished by the use of sand bags around the material, heavy-duty plastic sheeting placed on top of smaller stockpiles of materials, or other suitable methods.
- Grading and demolition contractors shall be required by construction specifications to secure approval of haul routes to export or otherwise transport off-site excavated materials prior to commencement of such activity, pursuant to LAMC Section 91.7006.
- Prior to issuance of a grading permit or B-Permit for activities involving construction dewatering, evidence shall be provided to the LADBS or City of Los Angeles Department of Public Works (LADPW), as appropriate, that a valid National



Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge permit is in place. The NPDES or Industrial Waste Discharge permit shall include provisions for evaluating the groundwater for potential contamination, and, if necessary, the need for treatment of dewatering discharge.

- Groundwater extracted in accordance with remedial activities and construction dewatering that may be required during project development shall be conducted in accordance with RWQCB and other agency requirements (i.e., LADPW, LADBS, etc.), as appropriate. In the event that contaminated groundwater is encountered during excavation, grading or construction, the activities that potentially lead to the discharge of such groundwater shall be halted until the dewatering discharge options are evaluated and managed pursuant to RWQCB or other agency requirements, as appropriate. RWQCB or other agency reporting requirements shall be implemented, as appropriate.
- Extraction of contaminated soil vapors shall be conducted in accordance with RWQCB and SCAQMD established handling, treatment, and disposal requirements in conjunction with the implementation of remedial activities requiring such extraction.
- The Applicant shall implement a soil import procedure to evaluate imported soils, satisfactory to the Regional Water Quality Control Board. The procedure shall include investigation of historical uses at the borrow site, soil sampling and analysis of soil prior to excavation and hauling to the site, and comparison of detected concentrations of any chemicals found in soil with appropriate health-based screening levels. Only soils that pass the screening shall be imported to the site and used as fill.

### **Methane Safety System for Long-Term Project Operations**

- Prior to issuance of a building permit for individual development projects within the Proposed Project site, the permit applicant shall submit to the LADBS a methane safety plan prepared by a licensed engineer. The methane safety plan shall conform to the Village at Playa Vista Building Methane Mitigation Guidelines and Methane Mitigation Standard, or the City's Methane Ordinance No. 175,790, provided that the requirements in that new ordinance continue to reduce the potentially significant impact to a less than significant level. The methane safety plan or site investigation/construction plan shall report the following: methane concentration levels that exist at the area of the proposed construction/improvement and shall specify the appropriate methane safety measures that are incorporated into the design, construction, and operation of the subject improvement.

Based on the levels of methane identified at specific sites, a gas detection system, pressure sensors, ventilation, monitoring, and emergency procedures, and other measures as provided for in the Village at Playa Vista Building Methane Mitigation Guidelines or the City's Methane Ordinance No. 175,790 shall be required, as appropriate. Mitigation systems for each building shall be based on a site investigation in combination with the Village at Playa Vista Building Methane Mitigation Guidelines or the City Methane Ordinance. Any variations to the Village at Playa Vista Building Methane Guidelines and Table XX or the City Methane Ordinance are subject to the joint approval of the LADBS and the Los Angeles Fire Department (LAFD) when engineering and other data and analysis demonstrates an equivalent level of building safety. The specific design elements of the methane requirements shall be subject to the review and approval of the LADBS in consultation with the LAFD.

- Prior to issuance of a B-Permit for public works projects or a building permit for subsurface utility improvements with the Proposed Project site, the permit applicant shall submit to the LADPW, a methane safety plan or site investigation/construction plan prepared by a licensed engineer who is acceptable to LADPW. The methane safety plan or site investigation/construction plan shall indicate the methane concentration levels that exist at the area of the proposed construction/improvement and shall specify the appropriate methane safety measures that are incorporated into the design, construction, and operation of the subject facility. The specific contents of the methane safety plan or site investigation/construction plan and the nature and extent of safety provisions described therein shall be subject to the discretion, review, and approval of the LADPW in consultation with the LAFD.

### **Other**

- Should any unrecorded oil well be found during excavation and grading, it shall be abandoned in accordance with the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) under Title 124, Chapter 4 of the California Administration Code or recorded per DOGGR regulations. Prior to issuance of any building permit within a lot affected by discovery of an unrecorded oil well, the Applicant shall submit a final clearance letter issued by DOGGR regarding the proper abandonment of the well(s) to the Department of Building and Safety and the Fire Department.
- Prior to issuance of any building permit on a lot where oil or gas wells are found, an engineering plan that includes proper safety measures and timing of the implementation of those measures shall be submitted and approved by LADBS.

---

### **Additional Mitigation Measures for the Off-Site Improvements**

- Construction contracts shall include provisions requiring continuous compliance with all applicable federal, state, and local government regulations and conditions related to hazardous materials and wastes management.
- Any known or discovered soils with contamination above applicable regulatory limits shall be excavated/disposed of, treated in-situ, or otherwise managed in accordance with the requirements of the affected regulatory agencies.
- To address the potential that VOC-contaminated soils, groundwater and/or other materials may be encountered during excavation and grading, the contractor(s) selected for excavation and grading work shall maintain a valid SCAQMD Rule 1166 permit plan (i.e., approval of a Contaminated Soil Mitigation Plan) for areas of known or suspected contamination, and be prepared to control nuisance odors per SCAQMD Rules and Regulations.
- In the event that contaminated groundwater is encountered during excavation, grading, or construction, the dewater discharge shall be evaluated and managed pursuant to RWQCB requirements.
- Cal/OSHA worker safety requirements provide for air monitoring during subsurface excavation activities, including borings, trenching, and grading, to check for unsafe levels of methane, hydrogen sulfide, oxygen, and carbon monoxide. Should unsafe levels occur, appropriate safety measures shall be implemented as required.

#### **c. Unavoidable Adverse Impacts**

Significant adverse impacts would be avoided through implementation of applicable regulatory requirements and the above mitigation measures. As discussed above, the Proposed Project would not expose people or structures to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards; and would not interfere with, or expose people or structures to substantial risk from, heliport flight operations. As such, impacts would be less than significant. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

#### **d. Cumulative Impacts**

For the most part, the safety/risk of upset impacts of the Proposed Project would be unique to the site, not lending to cumulative effect in conjunction with related projects. The only other development of note in close proximity to the Proposed Project would be the adjacent Playa Vista First Phase Project. No significant cumulative impacts are expected to occur because the safety evaluation and resultant design, engineering, and construction recommendations related to the two development projects already anticipate the potential impacts of the total adjacent Playa Vista First Phase Project and Proposed Project buildout. With respect to soil gas, the methane management system provided for individual development proposals within the adjacent Playa Vista First Phase Project and Proposed Project sites would be designed to protect buildings and other occupiable structures from methane intrusion even in areas with high concentrations of methane. A key component of such methane management systems is the venting of soil gases. Such venting would occur in several ways including passive or active ventilation systems. The venting systems would be designed to handle methane at any concentration and are not expected to affect, or be affected by, adjacent development. As such, the combined development of the adjacent Playa Vista First Phase Project and Proposed Project is not expected to have a significant cumulative impact relative to the safety and effectiveness of methane management systems installed in conjunction with either project, or relative to the ability of methane to continue to safely vent into the atmosphere. As such, the adjacent Playa Vista First Phase Project and Proposed Project would not expose people or structures to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards; and neither project would interfere with, or expose people or structures to substantial risk from, heliport flight operations. As such, no significant cumulative safety/risk of upset impacts are anticipated. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## **12. POPULATION, HOUSING AND EMPLOYMENT**

### **a. Environmental Impacts**

The development of 2,600 dwelling units would increase the local population by 5,720 persons. The proposed office, retail, and community serving uses would generate a total of 1,180 permanent jobs. Based on these characteristics, the Project would have a jobs/housing ratio of 0.45. The Project is consistent with SCAG subregional growth projections and compatible with the applicable policies set forth in SCAG's Regional Comprehensive Plan & Guide. The Project is also compatible with City General Plan Housing Element policies, as well as other relevant General Plan policies. As a result, Project development results in less-than-significant impacts. Furthermore, the Project would have a beneficial and, thus, a less-than-

significant impact on the jobs/housing balance in the study area by reducing the existing jobs/housing ratio of 1.30 for the SCAG subregion (City of Los Angeles) within which the Project is located.

#### **b. Recommended Mitigation Measures**

Population, housing, and employment increases, anticipated under the Proposed Project, do not exceed SCAG 2010 projections for the three analysis areas and Project impacts, thus are concluded to be less than significant. In addition, the Project would be compatible with adopted housing policies, and as such, Project impacts are less than significant. As the Project does not result in any significant impacts, mitigation measures are not required for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

#### **c. Unavoidable Adverse Impacts**

No unavoidable adverse impacts on population, housing, and employment would occur with the development of the Proposed Project. Specifically, the Proposed Project would not exceed SCAG's 2010 population, employment and housing forecasts for the Local, Subregional and Regional Areas. Thus, Project development results in less-than-significant impacts. The Proposed Project is also concluded to result in a less-than-significant impact with regard to local and regional housing policies since the Project would be compatible with applicable housing policies. These conclusions are also applicable to the proposed Equivalency Program, as well as the proposed off-site improvements.

#### **d. Cumulative Impacts**

The Project, in combination with the related projects, and background growth (25 percent of known residential projects, and 10 percent of known commercial projects), would generate 14,240 new residential units in 2010. Compared with the SCAG-projected increase of 9,256 housing units in the Related Projects Study Area, the cumulative projects represent approximately 168.7 percent of the SCAG-projected housing unit growth. The cumulative population increase of the Project, related projects and background growth, would be 30,736. Compared with the SCAG-projected population increase of 56,693 in the study area, the cumulative projects represent 54.6 percent of the SCAG-projected growth in the Related Projects Study Area.

The cumulative increase in employment represented by the Project, related projects and background growth is expected to be 94,434 permanent jobs in the year 2010. Compared with the SCAG-projected growth in employment of 45,401 jobs in the study area, the cumulative projects represent a doubling of the SCAG-projected employment forecast. With the exception of

the jobs-rich LAX Master Plan (Related Project #34), related projects would be generally consistent with the commercial and residential development designated in the local Community and District Plans, and with the housing goals of the City of Los Angeles General Plan and SCAG's RCPG. Notwithstanding, related project growth would have an adverse impact on the jobs/housing balance ratio as the cumulative projects would have a more jobs-rich ratio than is forecasted for the area by SCAG. This impact is concluded to be significant since the total number of cumulative jobs is much greater than SCAG's forecasted employment growth.

The anticipated cumulative housing and employment growth would exceed the SCAG RTP housing and employment forecasts for 2010 in the Related Projects Study Area. Thus, the Project's cumulative impacts on housing and employment are significant. As the anticipated cumulative population growth would not exceed SCAG's forecast, cumulative population impacts are less than significant.

### **13. TRAFFIC AND CIRCULATION**

#### **a. Environmental Impacts**

Population and activities associated with the Proposed Project would potentially generate 24,220 daily trip ends. Of these, 1,626 trip ends would occur in the A.M. peak hour, and 2,302 trip ends would occur in the P.M. peak hour. Of the 1,626 A.M. peak hour trips ends and the 2,302 P.M. peak hour trip ends, 1,502 and 2,182 trips, respectively, are Project-generated external trips. The Proposed Project's Equivalency Program has been designed to generate equivalent or lesser traffic than the Proposed Project, and, as such, the following summary of Project impacts is inclusive of the Equivalency Program.

The potential impact that these trips might generate was evaluated for six impact categories: impacts on intersections, freeways, neighborhood streets, access, and public transit, and impacts from construction activities.

#### **Impacts on Intersections**

As discussed in Section 3.1 of the Draft EIR, the Traffic Study includes an analysis of the Proposed Project's impacts under two scenarios. One scenario assumes the Playa Vista Drive bridge and road extension to Culver Boulevard is part of the 2010 baseline conditions. The Traffic Study set forth detailed model runs showing this 2010 baseline condition, as shown in Appendices K-2, K-4, and K-5. A second scenario assumed that the Playa Vista Drive bridge and roadway extension to Culver Boulevard was not part of the transportation system in the 2010 conditions. The Traffic Study set forth detailed model runs showing the 2010 "No Playa Vista

Drive Bridge and Road” scenario, as shown in Appendices K-2, K-4, and K-5. The proposed land use definition and trip generation does not change under either baseline scenario.

Under the 2010 Baseline Scenario with Playa Vista Drive Bridge, of the 218 intersections included in the traffic analysis, the Proposed Project prior to mitigation would result in a significant impact to a total of 8 intersections operating at LOS C or LOS D, 8 intersections operating at LOS E and 15 intersections operating at LOS F during the A.M. peak hour. During the P.M. peak hour, the Proposed Project would, prior to mitigation, result in a significant impact to 8 intersections operating at LOS C or LOS D, 14 intersections operating at LOS E, and 25 intersections operating at LOS F. The Proposed Project would not result in a significant impact to the remaining study intersections (187 intersections in the A.M. peak hour and 171 intersections in the P.M. peak hour). This evaluation of Project traffic impacts could be moderated by traffic mitigation measures associated with other related projects for which mitigation measures have been identified but not yet funded as well as mitigation measures or other projects that have not yet been established and therefore not taken into account.

With the completion of the sale to the State of California and the relinquishment of the rights to construct the Playa Vista Drive Bridge and road, the baseline conditions as reflected in the Traffic Study exclude the bridge and road from the street system analyzed in the transportation model. Appendix K-2, beginning on page IX-3 shows 2010 Baseline Conditions under this scenario, 2010 Baseline Conditions with the Project added, and 2010 Baseline Conditions with the Project and proposed mitigation measures.

Under the No Playa Vista Drive Bridge and Road 2010 Baseline Scenario, the Proposed Project, prior to mitigation, would result in a significant impact to a total of five intersections operating at LOS C or LOS D, 10 intersections operating at LOS E and 16 intersections operating at LOS F during the A.M. peak hour. During the P.M. peak hour, the Proposed Project would, prior to mitigation, result in a significant impact to eight intersections operating at LOS C and D, 15 intersections operating at LOS E and 25 intersections operating at LOS F. The Proposed Project would not result in a significant impact to the remaining study intersections (185 intersections in the A.M. peak hour and 168 intersections in the P.M. peak hour out of 216 analyzed intersections would not have a significant impact.)

Compared to the 2010 Baseline with the Playa Vista Drive bridge and road, the same number of intersections are impacted in the A.M. peak hour but one additional intersection (Centinela Avenue at Culver Boulevard) is impacted in the P.M. peak hour (note – this intersection is impacted during the A.M. peak hour under both scenarios). This intersection would be mitigated to a less than significant level under either baseline scenario with implementation of the mitigation program discussed in Subsection 4.0.

The impacts identified in this analysis are based on the total buildout of the Proposed Project. However, the Proposed Project would be built over several years with new site population, and related traffic impacts occurring incrementally over time. Therefore, the mitigation measures for the Proposed Project have been placed into a sequence of improvements that would occur roughly commensurate with the increase in Project impact. This sequence has been incorporated into a subphasing plan that has been included in the mitigation measures.

### **Impacts on Freeways**

The future background traffic growth combined with the Project traffic would contribute to LOS E or LOS F conditions on certain segments of the I-405, I-10, and I-105 during the A.M. and P.M. peak hours; however, some of these freeway segments are currently operating at LOS E and LOS F during the peak hours. The SR-90 is projected to continue operating at acceptable levels of service (LOS B and LOS C) during the A.M. and P.M. peak hours, even with the addition of Project traffic. Motorists using the SR-90 would not experience much change in average travel speeds even as compared to current conditions.

Under the future “With Project” conditions before mitigation, approximately 35 percent of all freeway miles located within the traffic study area would operate at LOS D or better during the A.M. peak hour. Approximately 11 percent and 54 percent would operate at LOS E and LOS F, respectively. During the P.M. peak hour, approximately 24 percent of all freeway miles within the traffic study area would operate at LOS D or better and 12 percent and 64 percent would operate at LOS E and LOS F, respectively.

The Proposed Project adds a maximum of approximately 85 trips or less in any direction along the analyzed freeway segments of the I-405 during the A.M. peak hour. This translates to a maximum increase in demand to capacity (D/C) ratio of 0.008 or 0.8 percent of the overall freeway capacity. Using the Los Angeles County Congestion Management Program criteria for significant impact (0.02 increase in D/C at Level of Service F), this estimated increase would not result in any significant impact. Similarly, the Proposed Project’s maximum increase in D/C ratio of 0.015 along the SR 90 freeway segment west of the I-405, would also not result in any significant impact. During the P.M. peak hour, the Proposed Project results in a maximum increase in traffic along the I-405 of 97 trips or less which would increase the D/C ratio by 0.009 or 0.9 percent. Again, this increase would not result in any significant impact per CMP significance criteria. Along the SR 90 freeway, the Proposed Project would increase the D/C ratio by a maximum of 0.007 or 0.6 percent of its capacity, which would also not result in any significant impact in the P.M. peak hour.

There would be no difference in Project impacts on the freeway system under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).



---

### **Impacts on Neighborhood Streets**

The analysis on neighborhood streets identified neighborhoods where impacts might occur from travelers leaving the main arteries, to cut through neighborhoods and avoid traffic. Four neighborhood were identified that may be subject to significant neighborhood intrusion impacts. They include the areas bounded by the following:

- Inglewood Boulevard, Ballona Creek, Sawtelle Boulevard, Bray Street/Port Road
- Kentwood Avenue, 77th Street, Sepulveda Boulevard, Manchester Avenue
- Sepulveda Boulevard, 74th Street, La Tijera Boulevard, Manchester Avenue
- Rayford Drive, 83rd Street, Lincoln Boulevard, La Tijera Boulevard

The City of Los Angeles Department of Transportation has a neighborhood traffic management process in place to address such impacts in consultation with all affected parties. Accordingly, a mitigation measure is recommended which provides mechanisms for the development of neighborhood traffic management plan(s) in the potentially impacted neighborhoods. There would be no difference in Project impacts on neighborhood streets under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).

### **Impacts on Project Access**

With implementation of the Proposed Project and its Project Design Features/mitigation measures, there will be seven intersections that provide access to the Proposed Project site. Year 2010 operating conditions with the Proposed Project would be at LOS A during both the A.M. and P.M. peak hours at two of the seven intersections. Two more would operate at LOS B in both the A.M. and P.M. peak. Of the remaining intersections, one would operate at LOS A in the A.M. and LOS B in the P.M., one would operate at LOS C in the A.M. and LOS A in the P.M., and the final intersection, Jefferson Boulevard and Centinela Avenue, would operate at LOS D during the A.M. and P.M. peak hour. Since none of the intersections providing access into the Proposed Project site would be operating at LOS E or F during the A.M. or P.M. peak hours, Project impacts with regard to operational accessibility would be less than significant. Project roadways would be required to meet all current roadway standards and protocols for safety, no project design features would create any other safety hazards for pedestrians, bicyclists, and vehicles. There would be no difference in significant impacts on Project access under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).

## **Impacts on Public Transit**

Currently, there are six MTA bus lines, six Culver City lines, three Santa Monica bus lines, and three LADOT lines that operate within the Project Study Area. There is currently overcrowding on some of the lines serving the Project area, primarily along the north-south travel corridors, including Lincoln Boulevard, Sepulveda Boulevard, and Centinela Avenue-Inglewood Boulevard. At the same time, the overall transit system within the 100-square mile study area operates satisfactorily.

The Proposed Project would be expected to generate 1,187 daily transit trips, 80 A.M. peak hour trips and 113 P.M. peak hour trips. The addition of Project transit trips to the lines that are currently overcrowded may cause the capacity of some individual transit lines to be exceeded, and impacts to these specific lines are considered potentially significant prior to mitigation. Although impacts on these individual lines may be considered potentially significant, the bus transit system within the study area as a whole will continue to have excess capacity and operate satisfactorily.

Mitigation measures are recommended to enhance public transit services. In addition to meeting the additional demand generated by the Proposed Project, the enhancements would address deficiencies that currently exist on Culver City Line 6 and Line 2 that are projected to worsen in the future without service improvements. There would be no difference in Project impacts on public transit under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).

## **Construction-Related Impacts**

Traffic impacts from construction activities would be expected to occur as a result of the increased in truck traffic, increases in automobile traffic and reductions in existing street capacity. Estimates of average daily truck travel range from 114 trips per day during the average month to 376 trips per day during the peak month. On an average hourly basis, assuming a uniform distribution of trips over the workday, these daily trip totals would translate to 11 trips per hour in the average month and 36 trips per hour in the peak month.

Construction worker traffic would depend on not only the level of effort during various construction phases, but also on the mode and time of travel used by the workers. The hours of construction typically require workers to be on-site prior to the A.M. commute peak and allow them to leave prior to the evening peak. Many workers carpool to the job site and others stage off-site at contractors' yards and are transported to the job site in groups. There would be about 325 worker trips per day during the average month of construction, which would rise to about 578 trips per day during the peak month.

Impacts from construction traffic would primarily affect the following roadways in and around the Proposed Project site:

- Dawn Creek Drive, Runway Road, Bluff Creek Drive, Discovery Creek, Playa Vista Drive, Pacific Promenade, Seabluff Drive, Celedon Road, Alla Road, Millennium Drive, Westlawn Avenue, Centinela Avenue, Campus Center Drive, and Jefferson Boulevard.

Potential impacts associated with physical construction of the Proposed Project; e.g., lane closures, would be limited to those locations immediately adjacent to the Proposed Project site. The most notable impact would occur with the road widening along the south side of Jefferson Boulevard, adjacent to the Proposed Project site. Widening of the roadway from its current three eastbound lanes to four eastbound lanes would require a temporary reduction in service to two eastbound lanes, and could cause delays for eastbound travelers. Otherwise, the physical effects of construction would be limited. There would be no parking utilization within the construction zones and there would be no impact on parking.

In addition to these construction impacts, there would be impacts associated with implementation of the Proposed Project's off-site mitigation measures. Roadway widening at six locations would cause noticeable traffic delays, in a manner typical of such roadway improvements. Impacts on traffic conditions associated with construction of projects are typically considered temporary, short-term adverse impacts, but not significant. Nonetheless, there is a potential that motorists would be substantially inconvenienced by the implementation of anticipated roadway improvements. In particular, the construction activities along the Centinela Avenue Corridor, and the widening along Centinela Avenue at the intersection of La Tijera Boulevard could cause impacts that may be considered substantial by the travelers.

There would be no difference in construction-related impacts under either baseline scenario (i.e., with and without the Playa Vista Drive bridge).

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

#### **Introduction**

The traffic mitigation measures, referred to collectively as the Village at Playa Vista Transportation Improvement Program, include several mechanisms for reducing potential traffic impacts. These mechanisms consist of: (a) public transit improvements which support and encourage the use of public transit systems; (b) improvements to major and secondary arterial

roadways and intersections in the vicinity of the Project site; (c) improvements to the signalized intersections in the study area to upgrade locations to include the latest generation of computerized traffic signal system controls; (d) neighborhood traffic management plans; and (e) measures to reduce potential impacts from construction activity. All of the mitigation measures have been organized in a subphasing plan that addresses the timing and sequencing of the mitigation measures.

All traffic mitigation measures within the City shall be completed to the satisfaction of LADOT. If any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible, or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain.

All traffic mitigation measure improvements within the responsibility and jurisdiction of the public agencies other than the City shall be monitored through LADOT at the time of tract recordation and implemented to the extent feasible. If improvements within the responsibility and jurisdiction of public agencies other than the City of Los Angeles (i.e., County of Los Angeles, City of Culver City, City of Inglewood, Caltrans, Coastal Commission, etc.) cannot be implemented, significant traffic impacts may remain at such locations.<sup>1</sup>

The Applicant shall implement or provide funding for traffic mitigation measures as required below. Funding for measures may be provided by various sources. Measures that require funding may be guaranteed with the applicable agency or by a commitment from a funding source that may be allocated to that improvement, including, but not limited to, funds from: Mello-Roos, homeowner/property owner associations, as well as any other method of guaranteeing the measure that is acceptable to the City. In the event funding is provided for an agency to implement a measure but the measure is not implemented, there is a potential that a significant impact may remain.

If any of the traffic mitigation measures are determined to be infeasible or if superior mitigation measures are identified in the future, the Applicant may provide substitute mitigation, subject to the approval of LADOT. Any such substitute mitigation measure must be approved by the agency with jurisdiction over the location of the measure, upon demonstration that the substitute measure is equivalent to, or superior to the original mitigation measure.

---

<sup>1</sup> Under CEQA Section 15091(a)(2), a Lead Agency may approve a project with significant impacts, if there is a finding that “. . . changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding . . . [and that] such changes have been adopted by such other agency or can and should be adopted by such other agency.”

---

### **Transportation Improvement Program/Phasing**

- The Transportation Improvement Program shall be implemented according to the traffic mitigation measure subphasing plan presented in Table 3 on page 99, as may be modified and approved by LADOT in accordance with this measure. The subphasing plan may be revised, where appropriate and as determined by LADOT: (1) upon demonstration that measures for each subphase in the revised subphasing plan are equivalent or superior to the original mitigation measures; and/or (2) upon demonstration that approval or implementation of measures has been delayed by other governmental entities, provided that the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.
- Prior to the issuance of any building permit for each subphase, all on- and off-site traffic mitigation measures required for that subphase shall be completed or suitably guaranteed satisfactory to LADOT.
- Prior to the issuance of the final Certificate of Occupancy in the final subphase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT.

### **Public Transit System Improvements**

- The Proposed Project shall provide four additional buses (to be operated by the City of Culver City) to supplement regional bus transit service along key travel corridors. The Proposed Project shall provide one bus each to supplement peak-hour operations for Lines 2 and 6, and two buses to supplement peak-hour operations and to extend Line 4 to provide all-day bus service from Fox Hills Transit Center along Jefferson Boulevard to the west. The Proposed Project shall also fully fund operations and maintenance costs for each new bus for a period of three years and compensate for the unsubsidized portion of the operations and maintenance costs for an additional seven years to ensure continued operations. Farebox revenues shall be credited against operating costs. The City shall be provided a copy of the agreement between the applicant and Culver City regarding implementation of the measure prior to tract recordation.
- The Proposed Project shall provide design and implementation costs for implementation of the Transit Priority System (TPS) associated with the Metro Rapid Expansion Project at twenty-five (25) intersections along the Lincoln Boulevard Rapid Bus Route corridor. The TPS hardware includes updated traffic signal controllers at signalized intersections and other associated bus vehicle identification system components that contribute to a system of real-time signalization control.

Table 3

**VILLAGE AT PLAYA VISTA  
DRAFT MITIGATION SUBPHASING PLAN <sup>a</sup>**

Subphase <sup>b</sup>	P.M. Peak-Hour Trips per Subphase <sup>b</sup>	Transportation System Improvements <sup>c, d, e, f</sup>	Jurisdiction
Village Subphase 1	575	1. Provide funding for 1 bus for Culver City Bus Line 6 (CC6)	Culver City
		2. Provide funding for 1 bus for Culver City Bus Line 2 (CC2)	Culver City
		3. Provide funding for Airport System ATCS	City of Los Angeles
		4. Provide funding for Transit Priority System (TPS) on Lincoln Corridor	City of LA/Caltrans
		5. Signal improvement (phasing) at Lincoln Bl/83rd St	City of LA/Caltrans
		6. Provide funding for neighborhood traffic management	City of Los Angeles
Village Subphase 2	575 (1,150 cumulative)	1. Provide funding for 2 buses for CC4 (includes extension to Playa Del Rey)	Culver City
		2. Physical and/or operational improvements at:	
		2a. Centinela Av/Venice Bl	City of LA/Caltrans
		2b. Green Valley Circle/Centinela Avenue	Culver City
		2c. La Tijera Bl/Centinela Av	City of Los Angeles
		2d. Overland Av/Culver Bl	Culver City
		2e. Sawtelle Bl/Culver Bl	Culver City
		3. Provide funding for signal improvement at Aviation Bl/Florence Av/Manchester Av	City of Inglewood
		4. Project component – Jefferson Boulevard corridor improvement (between Beethoven Av to Centinela Av) <sup>g</sup>	City of Los Angeles
		5. Project component – complete Bluff Creek Dr corridor improvement (Dawn Creek to Westlawn) <sup>g</sup>	City of Los Angeles
6. Campus Center Drive between Millennium and Bluff Creek Drive – Public Access	City of Los Angeles		
Village Subphase 3	575 (1,725 cumulative)	1. Provide funding for Smart Corridor System ATCS	City of Los Angeles
		2. Extension of internal shuttle to off-site locations	LA/Culver City/LA County
		3. Physical and/or operational improvements at:	
		3a. Centinela Av/Culver Bl	City of Los Angeles
		3b. Centinela Av/Washington Pl	Culver City
		3c. La Brea Av/Centinela Av	City of Inglewood
		3d. Palawan Way/Admiralty Way	Los Angeles County

Table 3 (Continued)

**VILLAGE AT PLAYA VISTA  
DRAFT MITIGATION SUBPHASING PLAN**

Subphase <sup>b</sup>	P.M. Peak-Hour Trips per Subphase <sup>b</sup>	Transportation System Improvements <sup>c, d, e, f</sup>	Jurisdiction
Village Subphase 4	575 (2,300 cumulative)	1. Provide funding for 2 buses for CC6 Limited 2. Operational improvement at I-405 NB Ramps/Jefferson Bl 3. Centinela Avenue corridor improvement (Culver to SR-90)	Culver City Culver City/Caltrans City of Los Angeles

<sup>a</sup> The subphasing plan may be revised, where appropriate and as determined by LADOT: (1) upon demonstration that measures for each subphase in the revised subphasing plan are equivalent or superior to the original mitigation measures; and/or (2) upon demonstration that approval or implementation of measures has been delayed, provided that the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<sup>b</sup> P.M. peak-hour trip generation for each subphase would determine the specific traffic improvements shown. P.M. peak-hour trip generation to be estimated as subphases develop using the following factors:

Dwelling Units – 0.54 trip per unit

Office – 1.74 trips per 1,000 sf

Retail – 3.83 trips per 1,000 sf (includes pass-by reduction)

Community Serving Uses – 0.45 trip per 1,000 sf (includes internal capture reduction)

<sup>c</sup> Prior to the issuance of any building permit for each subphase, all on- and off-site mitigation measures for the subphase shall be complete or suitably guaranteed satisfactory to LADOT.

<sup>d</sup> Temporary Certificates of Occupancy may be granted in the event of any delay through no fault of the Applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<sup>e</sup> Substitute mitigation measures may be provided subject to approval by the agency with jurisdiction over the location of the measure, upon demonstration that the substitute measure is equivalent or superior to the original mitigation measure.

<sup>f</sup> Prior to the issuance of the final Certificate of Occupancy in the final subphase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT.

<sup>g</sup> The Jefferson Boulevard and Bluff Creek Drive corridors are components of the Proposed Project. Neither improvement serves to mitigate any Project impact; they are included in this table to establish timing for completion.

- The Proposed Project shall extend and expand the Internal Shuttle System, creating an intelligent demand-responsive Expanded Shuttle System which provides enhanced transit service for Project residents, visitors, employees, and the surrounding community, focusing on providing connections to key destinations such as Marina del Rey, Howard Hughes Center, the adjacent Playa Vista First Phase Project, and the Fox Hills Mall. Connections to regional transit service shall be provided at Lincoln Boulevard/Jefferson Boulevard and Fox Hills Mall Transit Center. This shuttle shall consist of the following key features:
  - Core Service Area – The central portion of the service area includes the area within the Proposed Project and Playa Vista First Phase Project sites. This core service area shall be continuously served by a core route along Runway Road from Crescent Park on the west side of the development to the Campus on the east. Minimum 15-minute headways shall be provided during the morning and evening peak hours along this core route. Key neighboring destinations, including Marina Del Rey, Fox Hills Mall, and Howard Hughes Center, shall be included as part of the demand-responsive component within the service area.
  - Specially Equipped Buses – Buses shall be low-emission or zero-emission buses sized appropriate to their role within the project (approximately 20 to 25 passenger vehicles). The buses shall be equipped with GPS (global positioning system) or other vehicle tracking system devices and communications systems in order to be able to provide the “Next Bus” locational and status information and to respond to calls from the extended service areas on a real-time basis.
  - “Next Bus” Real Time Information – Information on bus location and status shall be available over the internet and at bus shelters
  - Bus Call Ability – Patrons at bus stops outside of the central system core shall have the ability to call for the shuttle bus at the bus stop; whereby the shuttle operator would proceed to the requested location. Information on the status of the bus and the anticipated wait time would then be given to the patron.
- The Proposed Project shall provide two additional buses for the implementation of a Limited Service Bus Stop (to be operated by the Culver City Bus) during peak hours. Service frequency shall be approximately 30 minutes during the peak hours. This Limited Bus shall originate from the Fox Hills Mall Transit Center and shall serve the areas along the Sepulveda, Jefferson, and Centinela corridors, including the office, studio, and residential uses within the Proposed Project and adjacent First Phase Playa Vista project; the retail and office complex at Howard Hughes Center; downtown Westchester; and the Century Boulevard Office Corridor. The Limited Bus Service would offer connections and potentially coordinated transfers with other regional bus service and the Playa Vista intelligent shuttle. The Proposed Project



shall also fully fund operations and maintenance costs for each new bus during peak hours for a period of three years and compensate for the unsubsidized portion of the operations and maintenance costs for an additional seven years to ensure continued operations. Farebox revenues shall be credited against operating costs. The City shall be provided a copy of the agreement between the applicant and Culver City regarding implementation of the measure prior to tract recordation.

## **Roadway and Intersection Improvements**

### **City of Los Angeles**

Widening, restriping, signal system improvements such as Adaptive Traffic Control Systems (ATCS)<sup>2</sup> and/or public transit enhancements at the following intersections shall be required in a manner satisfactory to LADOT.

- *Centinela Avenue Corridor.* This corridor is proposed to be improved between Culver Boulevard and the SR-90 Freeway. This improvement consists of provision of an additional northbound lane along Centinela Avenue within the corridor along with a central turn lane where feasible. This improvement would result in three lanes northbound and two lanes southbound and effectively extend the three-lane-per-direction improvement provisions of the adjacent Playa Vista First Phase Project between Jefferson Boulevard and SR-90 to the north to Culver Boulevard. All the intersections along this corridor would also be improved with the additional travel lane in the northbound direction. The implementation of this corridor improvement would occur in two phases. The first phase of this improvement involves widening the Centinela Avenue roadway to provide two lanes in each direction plus a central two-way left turn lane and parking on both sides of the street. In the second phase, on-street parking would be restricted on the east side of the roadway during peak commute hours to facilitate provision of a third northbound lane between SR 90 and Culver Boulevard. This second phase improvement would not be considered until traffic demands reveal the need for added roadway capacity.

<sup>2</sup> *This system includes provisions of ATCS-associated signal equipment, additional loop detectors, communications set-up, and the associated controller hardware/software, if required. The ATCS is a PC-based traffic signal control program that provides full-response signal control based on real-time traffic operating conditions. ATCS automatically adjusts and optimizes traffic signal timing in response to current traffic demands on the entire signal subsystem such that the number of stops and the amount of delay are minimized along with improved traffic signal coordination throughout the subsystem. Currently, the Mar Vista subsystem within the City of Los Angeles is under ATCS control. LADOT estimates that the ATCS improves intersection capacity by an additional 3 percent over that operating under ATCS only.*

- *La Tijera Boulevard/Centinela Avenue.* Add a westbound through lane along Centinela Avenue so that the westbound approach would provide two through lanes, a shared through-right-turn lane, and dual left-turn lanes.
- *Culver Boulevard/Nicholson Street.* Implement the Regional Bus enhancements providing additional service along Culver City Bus Line 4 extending its service to Playa del Rey along Jefferson Boulevard and Culver Boulevard.
- *Sepulveda Boulevard/Howard Hughes Parkway.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6 and the design and implementation of the expanded internal shuttle system serving the Howard Hughes Center. Additionally, contribute to the design and implementation of a Limited Bus Service along Sepulveda Boulevard between the Proposed Project and Howard Hughes Center and the Century Boulevard Office Corridor.
- *Sepulveda Boulevard/Imperial Highway.* Contribute to the design and implementation of Airport System ATCS or a similar signal system enhancement program.
- *I-405 NB Ramps/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Lines 2 and 4 and its extension, and the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall. Additionally, restripe the intersection's westbound approach to provide a separate right, through-right, and two through lanes.
- *I-405 SB Ramps/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along Culver City Bus Lines 2 and 4 and its extension, and the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall.
- *Lincoln Boulevard/83rd Street.* Contribute to the provision of additional signal equipment, if required, to obtain the following overlapping right-turn arrow signal indications: Westbound 83rd Street right turns overlapping with the Lincoln Boulevard north-south left-turn phase. Contribute to the design and implementation of Airport System ATCS.
- *Lincoln Boulevard/Manchester Avenue.* Contribute to the design and implementation of Airport System ATCS.
- *Lincoln Boulevard/Venice Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 2. Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.

- *Sepulveda Boulevard/Manchester Avenue.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6. Contribute to the design and implementation of a Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor. Contribute to the design and implementation of Airport System ATCS.
- *Sepulveda Boulevard/I-105 WB Off-Ramp.* Contribute to the design and implementation of Airport System ATCS.
- *Sepulveda Boulevard/76th and 77th Streets.* Contribute to the design and implementation of a Limited Bus Service between the Proposed Project, Howard Hughes Center, and the Century Boulevard Office Corridor.
- *Bundy Drive/Ocean Park Boulevard.* Contribute to the design and implementation of Smart Corridor System ATCS.
- *Bluff Creek Drive/Centinela Avenue.* Restripe northbound Bluff Creek Drive to have a left-turn lane, two through lanes, and two right-turn lanes.
- *Lincoln Boulevard/La Tijera Boulevard.* Contribute to the design and implementation of Airport System ATCS.
- *Sepulveda Boulevard/79th and 80th Streets.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6. Contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Sepulveda Boulevard/Westchester Parkway.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6.
- *Centinela Avenue/Venice Boulevard.* Restripe to provide a separate southbound right-turn lane so that this Centinela Avenue approach would have a separate right-turn lane, two through lanes, and a single left-turn lane. Contribute to the design and implementation of Smart Corridor System ATCS.
- *Centinela Avenue/Culver Boulevard.* Provide a westbound right-turn lane so that the Culver Boulevard westbound approach would have a separate right-turn lane, two through lanes, and a single left-turn lane.
- *Inglewood Boulevard/Culver Boulevard.* Provide left-turn lanes along eastbound and westbound Culver Boulevard, such that the eastbound and westbound approaches would each have a separate left-turn lane, a through lane, and a shared through-right-turn lane.

- *Centinela Avenue/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard. Also, contribute to the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall and its environs. Contribute to the design and implementation of the Limited Bus Service serving the Proposed Project, Howard Hughes Center, and the Century Boulevard Office Corridor.
- *Culver Boulevard/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard.
- *Lincoln Boulevard/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard. Contribute to the design and implementation of the expanded internal shuttle system serving the Marina del Rey area. Also, contribute to the design and early implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *La Cienega Boulevard/Centinela Avenue.* Contribute to the design and implementation of Airport System ATCS.
- *Sepulveda Boulevard/La Tijera Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6. Contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Lincoln Boulevard/Marina Expressway (SR 90).* Contribute to the design and implementation of Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Maxella Avenue.* Contribute to the design and implementation of Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Washington Boulevard.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Bluff Creek Drive.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Loyola Marymount (LMU) Drive.* Contribute to design and implementation of Transit Priority System (signal system components) along Lincoln

Boulevard. Also, contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor, and provide for the expansion of the internal shuttle system.

- *Inglewood Boulevard/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard, and toward additional service along the Culver City Bus Line 2. Also, contribute to the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall and its environs. Contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Campus Center Drive.* Provide for full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium Road, through a public access easement, irrevocable offer to dedicate, or other mechanism acceptable to LADOT and the Department of Public Works.

### **County of Los Angeles**

The Proposed Project shall provide the following intersection improvements to the satisfaction of the Los Angeles County Department of Public Works (LACDPW).

- *Admiralty Way/Mindanao Way.* Contribute to the design and implementation of an expanded internal shuttle system serving the Marina del Rey area.
- *Palawan Way/Admiralty Way.* Contribute a fair share towards the intersection improvement consistent with the Los Angeles County Department of Public Works proposed Admiralty Way Corridor Improvements. The improvement required by the Proposed Project consists of providing dual southbound left-turn lanes which is consistent with the County planned improvements at this location. The southbound approach would have dual southbound left-turn lanes, a through lane and a separate right-turn lane.
- *Sherbourne Drive/Centinela Avenue.* Contribute to the design and implementation of ATCS or any other signal system enhancement similar to it.
- *Lincoln Boulevard/Marina Freeway.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Bali Way.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.

- *Lincoln Boulevard/Fiji Way.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard. Contribute to the design and implementation of an expanded internal shuttle system serving the Marina del Rey area.
- *Lincoln Boulevard/Mindanao Way.* Contribute to the design and early implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.

### **City of Culver City**

The following intersection improvements shall be provided in a manner satisfactory to the City of Culver City:

- *Sepulveda Boulevard/Centinela Avenue.* Contribute to the design and implementation of ATCS. Implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 6 and the design and implementation of the expanded internal shuttle system serving Howard Hughes Center. Contribute to the design and implementation of Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Inglewood Boulevard/Washington Boulevard.* Implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 2.
- *Jefferson Boulevard/Overland Avenue.* Implement the Regional Bus enhancements providing additional service (two buses) along the Culver City Bus Line 4 and its extension.
- *Sepulveda Boulevard/Jefferson Boulevard and Playa Street.* Implement the Regional Bus enhancements providing additional service (two buses) along the Culver City Bus Line 4 and its extension. Also, contribute to the design and implementation of additional service (one bus) along the Culver City Bus Line 6.
- *Sepulveda Boulevard/Slauson Avenue.* Implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 6.
- *Green Valley Circle/Centinela Avenue.* Restripe in order to provide a separate westbound right-turn lane on Centinela Avenue. The westbound approach would have a separate right lane and two through lanes.

- *Centinela Avenue/Washington Place.* Add a second left-turn lane to both eastbound and westbound approaches on Washington Place. The eastbound approach would have dual lefts, a shared through-right lane, and a separate through lane. The westbound approach would have dual lefts, two through lanes, and a separate right-turn lane.
- *Overland Avenue/Culver Boulevard.* Add a right-turn lane along the westbound approach on Culver Boulevard. This approach would have a separate right-turn lane, a left-turn lane, and two through lanes. In addition, provide a southbound right-turn-only lane on Overland Avenue at this location, resulting in a separate right-turn lane, two through lanes, and dual left-turn lanes.
- *Sepulveda Boulevard/Culver Boulevard.* Implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 6.
- *Sawtelle Boulevard/Culver Boulevard.* Contribute toward provision of separate northbound and southbound right-turn lanes along Sawtelle Boulevard consistent with the Caltrans-proposed improvement at this location. Both northbound and southbound Sawtelle Boulevard approaches would have a separate right-turn lane, two through lanes, and a left-turn lane.
- *Hannum Avenue/Playa Street.* Implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 2.
- *Jefferson Boulevard/Duquesne Avenue.* Implement the Regional Bus enhancements providing additional service (two buses) along the Culver City Bus Line 4 and its extension.
- *Centinela Avenue/Washington Boulevard.* Implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 2.
- *Jefferson Boulevard/Sepulveda Boulevard (N).* Implement the Regional Bus enhancements providing additional service (two buses) along the Culver City Bus Line 4 and its extension.
- *Sepulveda Boulevard/Sawtelle Boulevard.* Implement the Regional Bus enhancements providing additional service (two buses) along the Culver City Bus Line 4 and its extension. Also, implement the Regional Bus enhancements providing additional service (one bus) along the Culver City Bus Line 6.

### **City of Inglewood**

The following intersection improvements shall be provided in a manner satisfactory to the City of Inglewood Department of Public Works.

- *Aviation Boulevard/Manchester Boulevard.* Contribute to the design and implementation of ATCS or any other similar computerized signal system enhancement.
- *La Brea Avenue/Centinela Avenue.* Restripe in order to add a westbound right-turn lane on Centinela Avenue. The westbound approach would have a right-turn lane, a left-turn lane, and two through lanes.

### **City of El Segundo**

Proposed improvements to the following intersection (which lies on the boundary of the City of El Segundo and the City of Los Angeles) shall be required in a manner satisfactory to the respective City Departments of Transportation/Public Works.

- *Sepulveda Boulevard/Imperial Highway (El Segundo).* Contribute to the design and implementation of ATCS at this location or a similar signal system enhancement program.

### **Caltrans**

The following improvements, which are described above, are located on State Roadways and shall be implemented to the satisfaction of Caltrans working closely with the jurisdictions in which the cross-streets are located. The proposed improvements at each of these intersection locations are described in more detail under the discussion of the mitigation measures for the various other jurisdictions, above. These improvements shall be coordinated with the City of Los Angeles, the County of Los Angeles, and the City of El Segundo, as applicable. They include the following locations:

1. Lincoln Boulevard (SR 1)/Marina Freeway (SR 90) intersection (Contribution to Transit Priority System (signal system components) (City of Los Angeles)
2. Lincoln Boulevard/Maxella Avenue (City of Los Angeles)
3. Lincoln Boulevard/Venice Boulevard (City of Los Angeles)
4. Lincoln Boulevard/Washington Boulevard (City of Los Angeles)



5. Lincoln Boulevard/83rd Street (City of Los Angeles)
6. Venice Boulevard/Centinela Avenue (City of Los Angeles)
7. Sepulveda Boulevard/I-105 WB Off-Ramp (City of Los Angeles)
8. Sepulveda Boulevard/Imperial Highway (City of Los Angeles/El Segundo)
9. I-405 NB Ramps/Jefferson Boulevard (City of Los Angeles)
10. I-405 SB Ramps/Jefferson Boulevard (City of Los Angeles)
11. Lincoln Boulevard/Jefferson Boulevard (City of Los Angeles)
12. Lincoln Boulevard/Bluff Creek Drive (City of Los Angeles)
13. Lincoln Boulevard/Loyola Marymount University (LMU) Drive (City of Los Angeles)
14. Lincoln Boulevard/Fiji Way (Los Angeles County)
15. Lincoln Boulevard/Mindanao Way (Los Angeles County)
16. Lincoln Boulevard/Bali Way (Los Angeles County)
17. Lincoln Boulevard/Manchester Boulevard (City of Los Angeles)
18. Lincoln Boulevard/La Tijera Boulevard (City of Los Angeles)

### **Neighborhood Traffic Management**

- Pursuant to the schedule established in the final adopted subphasing program, the Project Applicant shall provide a funding mechanism acceptable to LADOT for necessary City staff support for development of neighborhood traffic management plan(s) and for subsequent implementation of traffic calming measures contained in the plan(s). Development of a plan for any particular community would be initiated at the request of the residents in the community. Eligible communities would consist of the residential neighborhoods within the boundaries listed below:
  - Inglewood Boulevard, Ballona Creek, Sawtelle Boulevard, Bray Street/Port Road
  - Kentwood Avenue, 77th Street, Sepulveda Boulevard, Manchester Avenue
  - Sepulveda Boulevard, 74th Street, La Tijera Boulevard, Manchester Avenue

- Rayford Drive, 83rd Street, Lincoln Boulevard, La Tijera Boulevard

### **Construction Impact Measures for the Proposed Project**

- Prior to the issuance of any building or grading permit for the Project, construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans shall be prepared, satisfactory to LADOT. All construction contracts shall include provisions requiring compliance with the approved construction traffic management plans. Construction traffic management plans shall include, but are not limited to, the following:
  - Notify residents and business owners ahead of construction activity which may affect traffic through signage, advertisements, or other means, as appropriate.
  - Configure construction parking to minimize traffic interference to the extent feasible.
  - Provide temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).
  - Schedule construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
  - Reroute construction trucks off congested streets.
  - Consolidate truck deliveries.
  - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, to the extent feasible.
  - Construction-related vehicles shall not park on any residential street, with the exception of active construction sites within the Project.
  - No construction activity shall block access to any residence or place of business, without prior notice.
  - Safety precautions shall be provided for pedestrians and bicyclists through such measures as alternate routing and protection barriers.
  - All contractors shall be required to participate in a common carpool registry during all periods of contract performance monitored and maintained by the Applicant's Monitor.
  - All construction-related deliveries, other than concrete and earthwork-related deliveries, shall be restricted to non-peak travel periods to the extent feasible.

- 
- The construction manager or designee for each construction project shall notify the LAUSD's Transportation Branch and the local school administrator regarding the expected start and ending dates for Project construction that may affect existing pedestrian and vehicular routes serving Playa del Rey School.
  - No staging or parking of construction vehicles, including vehicles to transport workers, shall occur on streets adjacent to Playa del Rey School.
  - The Pedestrian Routes Map (Attachment F to the MMRP) shall be reviewed, and potential safety issues identified in the preparation of the Traffic Management Plan.
- Construction vehicle travel through neighboring jurisdictions other than the City of Los Angeles shall be conducted in accordance with the standard rules and regulations established by the respective jurisdictions where such jurisdictions would be subject to construction impacts. These include allowable operating times for construction activities, truck haul routes, clearance requirements, etc.
  - Prior to the issuance of any grading permit for the Project, required permits for the truck haul routes shall be obtained from LADOT, Caltrans, and other affected jurisdictions.

#### **Additional Construction Mitigation Measures for the Off-Site Improvements**

- Notify residents and business owners ahead of construction activity which may affect traffic through signage, advertisements, or other means as appropriate.
- Provide temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).
- Schedule construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
- Reroute construction trucks off congested streets.
- Consolidate truck deliveries.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, to the extent feasible.
- Construction-related vehicles shall not park on any residential street, with the exception of active construction sites within the Project.

- No construction activity shall block access to any residence or place of business, without prior notice.
- Safety precautions shall be provided for pedestrians and bicyclists through such measures as alternate routing, and protection barriers.
- The construction manager or designee for each construction project shall notify the LAUSD's Transportation Branch and the local school administrator regarding the expected start and ending dates for Project construction that may affect existing pedestrian and vehicular routes serving Playa del Rey School.
- The Pedestrian Routes Map (Attachment F to the MMRP) shall be reviewed, and potential safety issues identified in the preparation of the Traffic Management Plan.
- There shall be coordination with applicable transit agencies for temporary alternative pick-up/drop-off points if bus stops are affected by construction of the off-site improvements.

### **c. Unavoidable Adverse Impacts**

Six separate analyses were performed addressing the Proposed Project's adverse impact. Those sections and the conclusions reached for each analysis are as follows:

- **Intersection Analysis:** Under the 2010 Baseline Scenario with Playa Vista Drive Bridge, the Proposed Project's mitigation program would eliminate the significant impacts at all intersections except Jefferson Boulevard and Centinela Avenue. Operating conditions at this intersection, located within the City of Los Angeles, would be LOS C (good service) during the A.M. peak hour and LOS D (fair service) during the P.M. peak hour. No significant impacts would remain in any of the other jurisdictions included in the Traffic Study. The number of intersections operating at LOS E or F would increase during the A.M. peak hour from 84 intersections (2010 base) to 85 intersections with the Proposed Project and mitigation. During the P.M. peak hour the number would decrease from 104 intersections to 102 intersections. These impacts would be the same under the Proposed Project's Equivalency Program, which would generate no greater number of trips during the A.M. and P.M. peak hours than the Proposed Project. Implementation of the Project's off-site improvements would not generate additional traffic, but would implement the mitigation program.

As a result of the relinquishment of the rights to build the Playa Vista Drive bridge and road and the passage of SB 666, the Playa Vista Drive bridge and road extension

to Culver Boulevard will not be part of the transportation system and is no longer part of the baseline conditions for the year 2010. Under the No Playa Vista Drive Bridge and Road 2010 Baseline Scenario, as under the 2010 Baseline with the Playa Vista Drive Bridge and Road Scenario, the same number of intersections are impacted in the A.M. peak hour but one additional intersection (Centinela Avenue and Culver Boulevard) is impacted in the P.M. peak hour. This intersection is mitigated to a less than significant level under either 2010 Baseline Scenarios with implementation of the mitigation program identified in Section 4.0. As discussed above, one remaining significant impact was identified at the intersection of Centinela Avenue and Jefferson Boulevard. An additional mitigation measure (provision of full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium within the adjacent First Phase Project) has been identified that would reduce the remaining significant impact at Centinela and Jefferson to a less than significant level.

In summary, under the No Playa Vista Drive Bridge and Road Scenario, with the Proposed Project, 92 intersections would operate at LOS E or F in the A.M. peak hour and 108 intersections would operate at this level of service in the P.M. peak hour. With mitigation, including the new mitigation measure at Campus Center Drive, 84 intersections would operate at LOS E or F in the A.M. peak hour and 102 intersections would operate at this level of service in the P.M. peak hour. Further, no significant traffic impacts would remain.

- **Freeway Analysis:** The Proposed Project would not have a significant impact on the CMP freeway system, prior to mitigation, during either the A.M. or P.M. peak hours. The Project's net impacts would be the same after mitigation as prior to mitigation, and would be less than significant. These impacts would be the same for the Proposed Project and the Equivalency Program. There would be no difference in significant impacts on the freeway system under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).
- **Impacts on Neighborhood Streets:** Four neighborhoods were identified as being subject to potentially significant impacts on neighborhood streets. Project mitigation measures provide mechanisms for the development of neighborhood traffic management plan(s) in the potentially impacted neighborhoods, should such plans be requested by the residents in the community. Implementation of mitigation measure would reduce potential impacts to less-than-significant levels. These impacts would be the same under the Proposed Project's Equivalency Program, which would generate no greater number of trips during the A.M. and P.M. peak hours than the Proposed Project. Implementation of the Project's off-site improvements would reduce the pressure for drivers to use neighborhood streets. There would be no

difference in significant impacts on neighborhood streets under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).

- **Impacts on Project Access:** Impacts at all intersections providing access to the Project site would operate at services levels rates as having excellent to acceptable levels of service. Access to the Project site through these intersections would be less than significant. Project design would avoid hazardous conditions at points of site access, and access impacts with regard to safety of Project accessibility would be less than significant. Impacts would be the same under the Project's Equivalency Program. The implementation of the off-site improvements would have no long term impacts on accessibility to adjacent areas. Potential construction impacts on accessibility at off-site locations would be short term, mitigated, and less than significant. There would be no difference in significant impacts on Project access under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).
- **Impact on Public Transit:** Per the Project's mitigation measures, the Proposed Project would provide improved bus service. The available seating capacity on a system-wide bases would be increased by approximately 189 seats, with 80 seats for Project population in the A.M. peak hour and 113 in the P.M. peak hour. The balance would be available to serve other regional population. Frequency of service would be improved on Culver City Line 6 from 12-minute intervals to 10-minute intervals. On Culver City Bus Lines 2 and 4, the frequency would be improved from one-hour intervals to 30-minute intervals. These are net beneficial impacts. The Project's off-site improvements would support implementation of the public transit programs. There would be no difference in significant impacts on public transit under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).
- **Construction-Related Impacts:** Overall, the construction impacts on the transportation system would be temporary in nature and would cause an intermittent reduction in street and intersection operating capacity and efficiency. A potentially significant, short-term impact was identified from construction traffic occurring during the time one lane would be temporarily closed on the south side of Jefferson Boulevard for construction activities. Otherwise, the impacts were identified above as adverse, but not significant. In addition to the Project's direct and indirect impacts on traffic, secondary traffic impacts would occur at off-site locations that would be improved to implement the mitigation measures described in the preceding sections. Potentially significant secondary impacts could occur along the Centinela Corridor improvement, between Culver Boulevard and the SR-90 Freeway, and at the intersection of La Tijera Boulevard and Centinela Avenue. Mitigation measures have been developed to address traffic operations and safety during construction of the Proposed Project, and at the off-site locations. However, even with the implementation of the mitigation measures, delays in traffic at these locations could

still be considered substantial by the affected parties, and thus result in short-term, temporary significant impacts after mitigation. There would be no difference in significant impacts on construction-related traffic under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).

#### **d. Cumulative Impacts**

The Proposed Project's year 2010 Baseline conditions include the effects of land use growth and the resulting transportation growth within the entire study area. The travel forecasts, as well as the intersection capacity calculations, the freeway impact analyses, and the neighborhood impact analysis, include the cumulative impacts resulting from Project traffic, as well as regional land use growth. The conclusions discussed below are the same under both 2010 Baseline Scenarios discussed on page 92 (i.e., with and without the Playa Vista Drive bridge).

The cumulative traffic increases associated with the Proposed Project and Related Projects could lead to increased congestion along major travel corridors and increased levels of neighborhood intrusion, with the potential for Project traffic to exceed LADOT neighborhood impact significance threshold identified on local residential streets within four residential neighborhoods, as stated earlier in the Neighborhood Traffic Intrusion Analysis section. Also, the Proposed Project is not expected to have a significant impact on the public transit system since there would be available seating capacity on the transit lines serving the project site during peak periods after the addition of project-generated transit trips.

The Proposed Project has the potential to contribute to cumulative impacts at locations that are operating poorly under cumulative conditions even though the Project's addition of trips does not exceed LADOT or CMP threshold criteria. The Proposed Project is located within the west side of the City of Los Angeles. Traffic congestion is experienced on many freeways and surface streets throughout the greater Los Angeles area, in general, and in the west side, in particular, during peak periods.

The 2002 Congestion Management Program notes that the Los Angeles County freeway system is highly congested, with nearly half of the system operating at the two most congested levels (LOS E and F) during both the morning and afternoon peak hours. In the vicinity of the Proposed Project, data from the 2002 Congestion Management Program shows that the I-405 currently operates at LOS E and F during the morning and afternoon peak hours throughout the west side of Los Angeles and beyond, while the I-10 currently operates at LOS F during peak hours east of the I-405, and segments of the I-105 currently operate at LOS E and F during peak hours. The I-405 segments on the west side of Los Angeles are planned to be improved by Caltrans with the addition of high occupancy vehicle (HOV) lanes between the I-105 and the

I-10. This would enhance capacity on these freeways and facilitate bus travel and carpools/vanpools by completing the gap in the HOV lanes between the I-105 and the I-10. Plans to complete the gap in the HOV system between the I-10 and U.S. 101 are beyond the timeframe of this project.

The intersection analysis shows that 42 and 49 of the 218 study intersections operate at LOS E or F under 2003 baseline conditions during the A.M. and P.M. peak hours, respectively, and that these figures are projected to increase to 90 and 108 intersections operating at LOS E or F under future 2010 cumulative with Project conditions during the A.M. and P.M. peak hours, respectively. The intersection analysis presented in Table 9-2 beginning on page IX-3 of Appendix K-2 and Table 9-3 of Section II.37, Corrections and Additions to the Final EIR, shows that under the No Playa Vista Drive bridge and road 2010 future baseline with the Proposed Project, 92 intersections are projected to operate at LOS E or F in the A.M. peak hour and 108 would operate at LOS E or F in the P.M. peak hours.

The Proposed Project is projected to add traffic to locations that are either currently experiencing congestion or would experience congestion under cumulative future conditions. The incremental addition of even a small amount of Project-generated traffic to poorly-performing locations, even locations where a significant impact would not be triggered under LADOT or Los Angeles County CMP significant impact threshold criteria, would constitute a contribution to significant cumulative impacts at these locations. This could include intersection or freeway locations projected to operate at LOS E or F under cumulative conditions, local residential streets already experiencing intrusion traffic under cumulative conditions, or public transit lines experiencing overcrowding under cumulative conditions.

Mitigation measures for the Proposed Project would improve cumulative conditions and would alleviate the Project's contribution to cumulative impacts at the mitigated locations. Mitigation measures consisting of improvements to the public transit system would also help to alleviate cumulative conditions not only at locations impacted by the Proposed Project but also at additional locations along the transit corridors to be improved. Funding and implementation of neighborhood traffic management plan(s) for eligible communities as mitigation for potential Project neighborhood intrusion impacts would also help to relieve other cumulative cut-through traffic through the same neighborhoods.

With implementation of the proposed improvement measures, the impact of the Proposed Project on cumulative impacts would be reduced, with the number of intersections projected to operate at LOS E or F reduced to 85 and 102 during the A.M. and P.M. peak hours, respectively, under cumulative conditions with the Proposed Project and mitigation measures. On a system-wide basis, the average performance of the transportation system measured by intersection V/C ratios would be better during both peak hours under future cumulative conditions with the Proposed Project and mitigation measures than that under the future 2010 baseline conditions



without the project. The Project's transportation system improvements consisting of roadway corridor and intersection enhancements, signal system improvements, and transit system improvements would improve cumulative intersection operations at 51 and 61 congested LOS E/F locations in the A.M. and P.M. peak hours, respectively. This mitigation effectiveness is much greater in number and magnitude than the impact caused by the Proposed Project's traffic at these locations. Therefore, the Proposed Project improvements would not only mitigate the Project's direct impacts, but would also mitigate some of the cumulative growth forecasted to occur. Furthermore, implementation of the Proposed Project's transit system improvements would add a substantial number of seats to the capacity of the public transit system serving not only the project site but also surrounding areas of the Los Angeles west side. These conclusions are the same under either baseline scenario. However, an additional mitigation measure has been added that would require full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium, as described in Section II.15, Corrections and Additions to the Final EIR. Under the 2010 No Playa Vista Drive bridge and road scenario, with implementation of the proposed improvement measures the number of intersections operating at LOS E or F would be reduced to 84 and 102 during the A.M. and P.M. peak hours, respectively.

Cumulative impacts regarding Proposed Project access would be cumulatively less than significant, since the operating conditions at the Project Project's access points are projected to be better than LOS E during both the A.M. and P.M. peak hours inclusive of anticipated cumulative traffic growth and there are no related projects in the immediate vicinity that would contribute to an obstruction of visual conditions for travelers or pedestrians accessing the Proposed Project site. Cumulative impacts from construction may occur on roadways when multiple projects require lane closures in proximity to one another at the same time. Both the Proposed Project and related projects would be expected to implement standard procedures for mitigating construction traffic impacts on roadways and insuring safety. Nonetheless, since the Proposed Project's impacts from construction, inclusive of the Equivalency Program and the off-site improvements, have been identified as potentially significant short-term impacts, cumulative impacts from construction are considered to be potentially significant temporary, short-term significant impacts. There would be no difference in Project impacts on construction-related traffic under either baseline scenario (i.e., with and without the Playa Vista Drive Bridge).

## 14. PARKING

### a. Environmental Impacts

#### Off-Street Parking

The Proposed Project intends to provide off-street parking as required by the Playa Vista Area D Specific Plan. The parking would be provided under Section 9A that specifies parking amounts based on standard by use or under Section 9B that allows parking in accordance with a demand study. The number of parking spaces that would be required under Section 9A and 9B were estimated for the Proposed Project's uses. Section 9A of the Specific Plan would require 6,337 parking spaces, of which 5,424 spaces would be for residential use and 913 spaces would be for non-residential uses without application of the mixed-use considerations. However, the Project's mixed uses would offer shared parking efficiencies as different non-residential uses vary in terms of the times of day when their respective parking demands would be expected to peak. For example, office uses peak in the late morning hours, while retail uses peak in the mid-afternoon, and restaurants peak in the evening. The number of non-residential parking spaces required with shared parking would be 762 spaces. The total number of spaces required would be 6,186 spaces.

The amount of parking required based on a demand analysis for the types and mix of uses expected at the Project site is 4,568 spaces, of which 3,718 spaces would be for residential uses and 850 spaces would be for non-residential uses. With shared parking, the demand for non-residential uses is estimated to be 751 spaces, and the total for all uses would be 4,469. Since, the demand for parking is less than the requirements under Section 9A, the demand for parking would be met through the mechanisms established in the Area D Specific Plan. Since the demand for parking would be met, impacts would be less than significant.

The demand for parking under the Equivalency Program would be less than that for the Proposed Project, and would be also be met through the requirements of the Area D Specific Plan.

#### Street Parking

The Proposed Project would also provide street parking throughout the Project site in a manner that is consistent with the City of Los Angeles local and collector street design standards. This parking would be in addition to the off-street parking that is estimated to meet Project demand. As a result, the on-street Project's street parking spaces would supplement the off-street parking supply to provide additional convenience for the on-site population, and make short-term street parking available to the Proposed Project's neighborhood retail and community serving uses.

The Proposed Project is not expected to affect any existing street parking in the Project vicinity. However, one of the Project's off-site mitigation measures would require the implementation of restricted parking during the A.M. and P.M. peak periods and full-time unavailability of some space during construction. Impacts on parking would be less than significant.

#### **b. Recommended Mitigation Measures**

The Proposed Project would not result in a significant impact; therefore, mitigation measures are not required or recommended for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

#### **c. Unavoidable Adverse Impacts**

There would be no adverse impacts to existing street parking bordering the Proposed Project site or to the street parking that would be created by the Proposed Project. Specific Plan requirements and the demand for off-street parking would be met with on-site parking facilities. Such parking would be provided for the Proposed Project and the Equivalency Program.

The Proposed Project includes mitigation measures to reduce traffic impacts which would require off-site roadway improvements. These improvements would generate indirect, secondary impacts which would result in the implementation of parking restrictions during the A.M. and P.M. peak hour periods along the Centinela Corridor, between Ballona Channel and Culver Boulevard, as well as full-time unavailability of some spaces during construction, an adverse impact. Parking impacts of the Proposed Project, inclusive of the Equivalency Program and off-site improvements would be less than significant.

#### **d. Cumulative Impacts**

It is expected that all development in related projects would include mitigation measures requiring conformance with the applicable regulations, and other projects would not utilize the same parking facilities as the Proposed Project. The only related project in the immediate vicinity of the Proposed Project site is the adjacent Playa Vista First Phase Project. Both the Proposed Project and the Playa Vista First Phase Project are expected to provide sufficient parking space to meet the demand for parking. Cumulative impacts, inclusive of the Proposed Project, the Equivalency Program, and the off-site improvements, would be less than significant.

---

## **15. BICYCLE PLAN**

### **a. Environmental Impacts**

The Proposed Project would include development of a new system of bikeways that would serve the Proposed Project and off-site needs for bicycle travel. The implementation of new bikeways would be beneficial, as they would provide for additional ridership capacity, and connections to the existing bikeway network. The Proposed Project would be consistent with existing Bicycle Plans, goals, and policies, and would not adversely interfere with the existing bikeways in the area. A short-term impact may occur to the bike trail at Centinela Avenue and Culver Boulevard and/or Inglewood Boulevard and Culver Boulevard during construction of the Project's intersection mitigation measures to improve traffic flow at these locations. Any such impact would be reduced through standard practices for rerouting during construction. Mitigation measures that address construction impact on bicycle trails are included in the Traffic section of the EIR. Project impacts on bikeways and bike plans inclusive of the Equivalency Program and off-site improvements would be less than significant.

### **b. Recommended Mitigation Measures**

The Proposed Project would not result in a significant impact; therefore, mitigation measures are not required or recommended for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

### **c. Unavoidable Adverse Impacts**

The Proposed Project would include development of a new system of bikeways that would serve the Proposed Project and be a beneficial impact of the Project. A short-term impact may occur to the bike trail at Centinela Avenue and Culver Boulevard and/or Inglewood Boulevard and Culver Boulevard during construction of the Project's intersection mitigation at that location. Any such impact would be mitigated. Project impacts on bikeways and bike plans, inclusive of the Equivalency Program and off-site improvements, would be less than significant.

### **d. Cumulative Impacts**

The proposed linkages between the various projects are compatible with one-another and would implement or enhance existing Bike Plans. No known related projects would compromise existing bikeways. Cumulative development with the Proposed Project, its Equivalency Program, and the off-site improvements, would be consistent with Bike Plans and less than significant.

## 16. FIRE PROTECTION

### a. Environmental Impacts

The Proposed Project site is currently within the service areas of Los Angeles Fire Department Stations No. 5, 95, 63, and 62. The service district for these stations currently includes 160,787 residents and 53,981 employees, for a total population of 214,768 persons, and has 11,388 emergency incidents per year. This equates to a rate of 53 emergency incidents per 1,000 residents and employees. Applying this rate to the anticipated 5,720 residents and 1,180 employees estimated to reside and work in the Proposed Project results in an estimated 366 emergency incidents per year. This would be equivalent to about a 3 percent increase over the 11,388 emergency incidents. The Proposed Project will generate revenues which may be applied toward the provision of required manpower and equipment. Issues pertaining to funding are primarily socioeconomic in nature and may be considered further by the decision-makers in their review of the Proposed Project, who may apply such funds to the provision of fire services.

Stations 5 and 63 are the closest to the Proposed Project site. The distance to these stations is further than the service radius established by the City. However, one of the Conditions of Approval for the First Phase Project is the provision of a Task Force Fire Station, consisting of both Engine and Truck Companies. Such a station has been designated for a parcel at Playa Vista Drive and Fountain Park Drive. Its provision would allow service to the Proposed Project site in accordance with City Fire Department standards, thereby precluding a need for an additional new station or expansion or consolidation of existing facilities.

Emergency access to the Proposed Project would be provided by the existing and proposed street systems. City review of street widths, street lighting, and street signage will be based on an evaluation of requirements for the provision of emergency access. Emergency access from the proposed Playa Vista Fire Station would be along a route that operates at LOS levels of D or better, considered conducive to the flow of emergency vehicles.

As such, impacts would be less than significant. However, if the new Playa Vista station were not provided nor properly staffed, a significant impact could occur.

### b. Recommended Mitigation Measures

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The Proposed Project would be required to meet the requirements of all Municipal Codes for Fire Protection. In addition, the following measures have been added to address: (1) the contingency of the planned Fire Station not being implemented; (2) to address additional design

considerations; and (3) to provide appropriate review procedures for Fire Department review of the Proposed Project.

- If the proposed fire station required for the adjacent First Phase Project is not built prior to the issuance of the first building permit, an agreement shall be reached between the Applicant and the Fire Department which provides for adequate fire services/facilities by the Department.
- Prior to the issuance of any building permit, a plot plan shall be submitted to the City Fire Department for approval.
- Prior to the issuance of any building permit, definitive plot plan and specifications, including fire prevention features, for the Project shall be submitted to and approved by the City Fire Department. Sprinklers may be required after review of the plot plans.
- Adequate off-site public and on-site private fire hydrants shall be required. The exact number and location of the hydrants shall be determined after the City Fire Department reviews the plot plan. The Project Developer shall be required to pay for any hydrant installations required by the Fire Department.
- Adequate vehicular accessways around all multi-story buildings shall be required by the Fire Department where buildings exceed 28 feet in height.
- Where fire apparatus will be driven onto the road level surface of a subterranean parking structure, the structural foundation of the subterranean parking structures shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.
- To mitigate potential significant impacts on access, the Applicant shall covenant that all current public and private streets shall remain open to free travel of emergency vehicles.
- The Applicant shall provide for all infrastructure improvement, including water main improvements, and/or expansion necessary to meet City Fire Department fire flow standards, in accordance with a phasing schedule to the satisfaction of the City Fire Department.

### **c. Unavoidable Adverse Impacts**

Implementation of the Proposed Project would result in the need for increased staffing for existing fire protection facilities and the City's fire protection services load. In addition to the new tax revenues from development of the Proposed Project that could be used for funding of the

expansion of fire services and facilities and the City Fire Station required for the Playa Vista First Phase Project, the Applicant will provide resources and improvements as required by all statutory regulations. Further, the Proposed Project would implement its mitigation measures. It is expected that the new fire station in the Playa Vista First Phase Project, with sufficient staffing, will avoid a need for further fire station additions, expansions, or consolidations, and no significant impacts would occur. Nonetheless, a contingency mitigation measure has been included to assure that adequate fire services and facilities are available to meet the needs of the Proposed Project, if the new station is not built. After mitigation, no significant impacts would occur. This conclusion applies the Proposed Project, the Equivalency Program, and the construction of the Project's off-site improvements.

#### **d. Cumulative Impacts**

Development of the related projects, as well as the Proposed Project, is subject to review for adequacy of water flow to the respective project sites, and the projects cannot be developed until such flows are available. Off-site facilities to serve the larger area are under the jurisdiction of the Department of Water and Power, which anticipates future water needs on the basis of regional forecasts and familiarity with the related development projects in the vicinity of the Proposed Project.

In addition to the existing fire stations, the cumulative development would be served by three new fire stations, including an Engine and a Truck Company that is required as a Conditions of Approval for the Playa Vista First Phase Project and two new station relocations and expansions that are funded and expected to be completed in 2006: Station 5 and Station 62.<sup>3</sup> Fire Station 62 will be located at 11970 W. Venice Boulevard. Fire Station 5 will be located at 8900 Emerson Avenue. Currently, both stations are 25 percent complete.<sup>4</sup>

New development would, in most cases, fall within recommended distances of one of the five anticipated fire stations. If a development should fall beyond the recommended distances, the fire department can require sprinkler systems as mitigation measures under the Municipal Code (LAMC 57.09.07). Developers of the individual related projects, as well as the Proposed Project, would provide for all statutory and Fire Department-required improvements to facilitate the provision of fire services.

The Proposed Project and the other related projects would add an additional 22,580 residents to the service areas of the City Fire Station Nos. 5, 95, 63, and 62. The

---

<sup>3</sup> Los Angeles City Department of Public Works, Bureau of Engineering Proposition F website, [http://eng.lacity.org/projects/fire\\_bond/project\\_window.htm](http://eng.lacity.org/projects/fire_bond/project_window.htm).

<sup>4</sup> Los Angeles 2000 Prop F Fire Facilities Bond Progress Report, December 2003.

Proposed Project and related projects would also generate 48,961 employees, for a total population of 71,541 (including a growth factor of 25 percent for residential population and a growth factor of 10 percent for employees). This population could generate an additional 3,792 emergency incidents annually. This would be equivalent to a 33 percent increase over the existing 11,388 incidents within the primary response area of Stations No. 5, 95, 63, and 62. Therefore, the Proposed Project and the identified related projects would increase the workload of Stations No. 5, 95, 63, and 62 with a potential reduction in the level of service to the existing community if there is no corresponding increase in manpower and equipment. With development of the anticipated new facilities, cumulative impacts would be less than significant. If anticipated new facilities are not built and sufficiently staffed, a potentially significant cumulative impact could occur. This conclusion applies the Proposed Project, the Equivalency Program and the construction of the Project's off-site improvements.

## **17. POLICE PROTECTION**

### **a. Environmental Impacts**

Based on the existing service ratios for the Pacific Division in which the Proposed Project is located, the Project's site population of approximately 5,720 residents and 1,180 employees would generate a need for eight new officers to serve the increased population. Under the Project's Equivalency Program, the population could be increased by 234, requiring an additional 0.3 officer. If the new officers were not provided, the ratio would fall from 1.17 officers per 1,000 population to 1.14 officers per 1,000 population. The Project's off-site improvements would not have an adverse effect on police services.

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.

Emergency access to the Project site would be provided by the existing and proposed street systems. City review of street widths, street lighting, and street signage will be based on an evaluation of requirements for the provision of emergency access. Because of the Proposed Project's size, the Los Angeles Police Department has expressed its concern on accessibility to parking areas for patrol vehicles, lighting issues for nighttime use, and provisions for private security throughout the Project site. Mitigation measures have been included to assure that the



Proposed Project has addressed these issues in a manner that is satisfactory to the Police Department.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

The following mitigation measures will address impacts on police service level and facilities as well as the issues pertaining to crime prevention:

- Prior to the issuance of the first building permit, the Applicant shall consult with the Los Angeles Police Department, Pacific Division, regarding site-wide crime prevention features, which may include: provision of call boxes in parks and/or other strategic locations for police and medical emergencies; payphones restricted to outgoing calls only; and “graffiti” cameras in strategic locations to discourage problem graffiti areas from arising.
- Prior to the issuance of each temporary or permanent Certificate of Occupancy, a diagram of the Proposed Project shall be provided to the Pacific Area Commanding Officer, which will include access routes, unit numbers (as available), and any additional information that would facilitate police response.
- Prior to the issuance of each building permit, the Applicant shall incorporate crime prevention features, pursuant to the Los Angeles Police Department (LAPD), Pacific Division, and the LAPD Crime Prevention Unit, appropriate to the design of the property involved in the Proposed Project. Those may include the following elements:
  - The incorporation of access for emergency service personnel and vehicles including provision of security access codes for police personnel;
  - Standard security measures for residential and employee access to buildings;
  - Use of video cameras and private security guards to monitor and patrol the project site during project construction and operation;
  - Entryways, elevators, lobbies, and parking areas with lighting that eliminates areas of concealment; and
  - Solid core doors with deadbolt locks to all offices, shops, and hotel units.

### **c. Unavoidable Adverse Impacts**

The Proposed Project impacts may result in the need for increased staffing for existing police protection facilities and to maintain the City's police protection services load. In addition to the new tax revenues from development of the Proposed Project (inclusive of the Equivalency Program) that could be used for the funding of expansion of the police services and facilities, the Applicant will provide resources and improvements required by all statutory regulations. 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 after mitigation would be potentially significant.

### **d. Cumulative Impacts**

The cumulative increase for police officers, from the Proposed Project and other related projects in the Pacific Division service area would create a cumulative demand for 79 new officers within the service district. If the new officers were not provided, the police service ratio would fall from 1.17 officers per 1,000 population to 0.96 officer per 1,000 population. These conclusions are inclusive of the Proposed Project and the Equivalency Program. Construction of the Project's off-site mitigation measures would not contribute to cumulative impacts on police services.

Each related project will contribute additional tax revenue not accounted for herein from which allocations can be made for commensurate expansion of police services. If such allocations are made by the City Council from such revenues, significant cumulative adverse effect upon police service would be avoided. Since it cannot be guaranteed that the revenue contributions from future development would be applied to police services, it is conservatively concluded that cumulative demand may result in a substantial reduction in the service ratio, and impacts after mitigation would be potentially significant.

## **18. SCHOOLS**

### **a. Environmental Impacts**

Development of the Proposed Project would generate a total of 616 students, distributed as follows: 304 elementary school students, 145 junior high school students, and 167 high school students.

Elementary school enrollment attributable to the Proposed Project would exceed the forecasted unused capacity at Playa del Rey Elementary School. This constitutes a significant impact on school capacity. However, with the addition of new classroom capacity, sufficient capacity would be available to accommodate the elementary school students generated by the Project. Under this scenario, development of the Proposed Project would have a less-than-significant impact on elementary school capacity. With the additional capacity provided by the Playa Vista Elementary School, the significant impacts on the available capacity at Playa del Rey Elementary School would be lessened, but not eliminated. As the addition of new classroom capacity at Playa del Rey Elementary School and the availability of the Playa Vista Elementary School cannot be assured, it is conservatively concluded that development of the Proposed Project would have a significant impact on elementary school capacity. However, with the payment of one-time school fees by the developer, Proposed Project impacts, pursuant to the provisions of SB 50, would be fully mitigated.

The Proposed Project is located within the attendance boundaries of Marina del Rey Middle School and Venice High School. Middle and high school enrollment attributable to Project development would be within the forecasted unused capacity of these two schools. This constitutes a less-than-significant impact on school capacity, as sufficient capacity would be available to accommodate Project-generated students without the construction of new school facilities and/or modifications to the existing operational characteristics of Marina del Rey Middle School or Venice High School.

#### **b. Recommended Mitigation Measures**

Under the provisions of SB 50, a project's impacts on school facilities are fully mitigated via the payment of the requisite new school construction fees established pursuant to Government Code Section 65995. Since the Applicant is required to pay these fees at the time of building permit issuance, impacts of the Project, inclusive of the Equivalency Program, would be fully mitigated. Therefore, no mitigation measures are required for the Proposed Project, inclusive of the Equivalency Program and off-site improvements. Implementation of the off-site measures would have no impact on schools.

#### **c. Unavoidable Adverse Impacts**

As future development will comply with the provisions of Government Code Section 65995, development of the Proposed Project, inclusive of the Equivalency Program and the identified off-site improvements, would not result in any adverse impact.

#### **d. Cumulative Impacts**

The Proposed Project and the relevant related projects would generate a total of 3,690 students: 1,157 elementary school (K-5) students, 1,145 middle school (6-8) students, and 1,388 high school (9-12) students. These levels of student generation exceed the capacities of the local schools to accommodate the cumulative demand generated by all of the related projects. As such, a significant cumulative impact on school facilities would occur. Under the provisions of State law, mitigation is limited to the imposition of new development fees per Government Code Section 65995. The payment of these fees, which is required of all cumulative development, would reduce the significant impact to a less-than-significant level.

### **19. PARKS AND RECREATION**

#### **a. Environmental Impacts**

The Proposed Project's 2,600 dwelling units are estimated to generate 5,720 residents which would create a demand for park space. At the same time, the Proposed Project would provide new parks and open space to meet increased demand. The Proposed Project would provide 11.4 acres of parks and 1.0 acre of bike lanes, exclusive of private, open space, such as courtyards and plazas, that would help to meet the Project's demand. In addition, if the assisted living component of the Proposed Project's Equivalency Program was implemented, an additional 0.12 acre of park space would be provided for each 50 assisted living units.

Besides 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. Further, maintenance of the parks within the Proposed Project would be provided in perpetuity by a property owners' association. The Proposed Project also includes 1.0 acre of bicycle lanes within several of the Project's right of ways. In addition, the Proposed Project proposes to provide 5.76 acres of 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).

The provision of 11.4 acres of active open space within the Proposed Project is equivalent to 2.0 acres of active open space per 1,000 residents and would increase the service ratio in the District Plan area from 0.7 acre per 1,000 population to 0.8 acre per 1,000 population. The 11.4 acres would meet the PRP's short- and intermediate-range standards for community and neighborhood parks of 2.0 acres per 1,000 residents.

The State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of 3.0 acres per 1,000 population in land dedication or fees, unless it is already exceeding that ratio. Municipal Code Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or in-lieu fees. Based on this formula, the Proposed Project would be required to dedicate approximately 17.65 acres of park and recreation space, pay in-lieu fees totaling \$8,057,400, improve park and recreational facilities serving residents of the subdivision, or provide a combination of all three. If the Proposed Project were to satisfy this requirement exclusively through 17.65 acres of parkland dedication, the City would be responsible for the cost of both improvements and ongoing maintenance.

The parks and recreational space provided by the Proposed Project would exceed the requirements established in LAMC Section 17.12 by providing 11.4 acres of parks, as well as improving those parks with landscaping; hardscaping; walking, jogging, and bicycle trails; children's play areas; recreational fields; and other recreational facilities, as appropriate. Further, maintenance of the parks within the Proposed Project would be provided in perpetuity by a property owner's association. The value of these improvements is conservatively estimated to be in excess of the \$8.1 million of in-lieu fees established in LAMC 17.12. Therefore, the Proposed Project is providing: (1) parkland at a ratio in excess of 2.0 acres per 1,000 population; (2) improvements valued in excess of the fees established within the City's parkland dedication ordinance (which is equivalent to 3.0 acres per 1,000 population); and (3) ongoing maintenance in perpetuity.

Thus, under any of these measures of demand, the demand for park or recreational facilities generated by the Proposed Project would be adequately accommodated by existing or planned facilities and service, and no significant impacts on parks and recreation would occur. Mitigation measures are proposed below to require implementation of the Project Design Features which serve to eliminate the Project's potentially significant impacts

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- 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)

- Prior to the issuance of the temporary or permanent Certificate of Occupancy for each 455 residential units, two acres of parks shall be provided and improved within the Project site; and an additional acre of off-site parks shall be provided concurrently (i.e., three acres in total), per the provisions outlined in the preceding mitigation measure.
- Prior to the recordation of any phase of the tract map for the Proposed Project, the required on-site and off-site parks shall be identified, including improvement and maintenance responsibilities, satisfactory to the local Council Office.
- In addition to the provision of park space identified above, the Proposed Project shall be responsible for providing improvements for the parks within the Project 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. The cost of the park improvements shall not be less than and is not limited by the amount of fees that the Project would be required to pay under LAMC Section 17.12D as though the Proposed Project was not dedicating any land for parks.
- Prior to recordation of any phase of the tract map for the Proposed Project, the applicant shall submit to the Advisory Agency for approval, in consultation with the Department of Recreation and Parks and the local Council office, a plan for the improvement of the parks to be provided by the Proposed Project.
- Prior to recordation of any phase of the tract maps, all parks within the Proposed Project in such tract map shall either be designated as active open space on such final tract maps or committed to open space through recorded deed restrictions and covenants, subject to the approval of the Advisory Agency.
- Prior to recordation of tract maps, lots designated for parks in tentative maps shall be offered for dedication to the Department of Recreation and Parks. If the Department of Recreation and Parks does not accept dedication of the park areas, a property owners' association shall be formed to maintain the park and recreational facilities in a manner satisfactory to the City of Los Angeles, together with provision for public access to the parks and the appropriate trails and easements guaranteed to the City. The property owners' maintenance responsibility for the park/recreational facilities shall be recorded in a Conditions, Covenants and deed Restrictions (CC & R) and a Covenant and Agreement. Any Covenant and Agreement to maintain park, open space and recreational fields/facilities shall be reviewed by the City Attorney prior to its acceptance by the Advisory Agency. Said covenant and agreement shall be recorded at tract map recordation. The property owner's association shall enter into a usage agreement with the Department of Recreation and Parks if requested.

---

### **Additional Mitigation Measure for the Equivalency Program**

- Additional park space shall be provided at the rate of 0.12 acres for every 50 assisted living units developed.

#### **c. Unavoidable Adverse Impacts**

The Proposed Project would provide an increase in the level of park and open space in the existing area, increasing the per capita ratio service level set forth in LAMC Section 17.12. The Proposed Project would also meet the short- and intermediate-range goal of 2.0 acres per 1,000 population for community and neighborhood parks set forth in the PRP, would exceed the requirements of LAMC Section 17.12 and would meet the demand for park services. No significant impacts are anticipated. This conclusion applies to the Proposed Project, inclusive of the Equivalency Program and the construction of the Project's off-site improvements.

#### **d. Cumulative Impacts**

The 5,720 residents for the Proposed Project, plus the 18,104 residents for all of the other related projects in the City of Los Angeles within a two-mile radius of the Project perimeter and other related background growth of 4,526 residents, are expected to generate a cumulative population increase of approximately 28,350 residents. Under the Project's Equivalency Program, this number could increase by 240 to 28,790 residents. The park space requirement to meet the various standards for the additional population would be as follows: 57.6 acres to meet the PRP's short- and intermediate-range standards for community and neighborhood parks of 2.0 acres per 1,000 residents; 86.4 acres to meet a 3.0-acre-per-1,000-resident standard per Quimby requirements, and 115.2 acres to meet the PRP's long-range goal of 4.0 acres per 1,000 residents, or in-lieu payments as applicable.

New park space to help meet future demand is included in four of the related projects used in the cumulative analysis of the EIR. These related projects would add approximately 40 acres of park space to the area. The provisions of the new park space will contribute to attainment of the required needs and will improve the existing community service ratio.

Future related projects within the City would be subject to LAMC requirements for the provision of open space. However, it can not be assured that all related projects within the City of Los Angeles would provide parks in accordance with the City's parks standards. As such, other related project development could have significant impacts. However, contributions of the Proposed Project to the availability of park space after the proposed mitigation measures would meet the demand for park provision and, therefore, would not contribute to a significant adverse effect with regard to cumulative impacts. This conclusion is inclusive of the Proposed Project, the Equivalency Program, and the construction of the Project's off-site improvements.

---

## **20. LIBRARIES**

### **a. Environmental Impacts**

The proposed urban development program would include up to 2,600 residential units that would generate new site population and related impacts on library services. The estimated population in these units is 5,720. The Proposed Project would be primarily served by the Playa Vista Library, located within the adjacent Playa Vista First Phase Project. The 10,500-sq.ft. Playa Vista Library will have the capacity to serve a population of 35,001 to 50,000. The estimated population increase associated with the Proposed Project and the 19,603 residents who would find the Playa Vista library closer than other libraries in the area would not exceed the capacity of the library (35,001 to 50,000).

Population from the Proposed Project would combine with the existing service population in the service area analyzed and, to the extent that crossover between library service occurs, be a consideration in the adequacy of library services in a larger district context. The capacity of libraries in the area (not including the Loyola Marymount University Library, a private facility), after completion of the new facilities, per the 1998 Los Angeles Public Libraries Branch Facility Plan and funding under the Proposition DD Library Construction Bond Program adopted in November 1998, is anticipated to be 85,002 to 150,000. The service population, inclusive of the Proposed Project, would be 70,806, less than the capacity.

Under the Project's Equivalency Program there could be an additional 240 residents within the Project site. This would still be within the available capacity. Impacts would be less than significant.

### **b. Recommended Mitigation Measures**

The Proposed Project would not result in a significant impact on library services. Existing, recently completed, and under-construction libraries, including the new Playa Vista Library, would be sufficient to meet future library needs associated with the Proposed Project. Mitigation measures are not required or recommended for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

### **c. Unavoidable Adverse Impacts**

New Project population would increase the demand for library services, but would not cause the capacity of any libraries within 2 miles of the Proposed Project site to be exceeded. Impacts would be less than significant. This conclusion is inclusive of the Project's Equivalency Program and construction of the off-site improvements.



#### **d. Cumulative Impacts**

The cumulative population increase within the Westchester/Loyola Village Library Service area would be 3,915. The total cumulative population increase from the related projects would be 11,086. In addition, a residential “background” growth of 25 percent is added to the total related residential projects since it is assumed that additional residential development within each library’s service area, particularly projects involving less than 35 units, would not require discretionary approval and, thus, would not appear on the related projects list. All residential development within the cumulative impact study area, including the Proposed Project, would result in a population increase of 19,578. Under the Proposed Project’s Equivalency Program, the cumulative population would increase to 19,818.

The City public library capacity within the local service area would be 85,002 to 150,000. This capacity includes the Westchester/Loyola Village and Playa Vista Libraries. The current service population is 65,086. The cumulative increase would not exceed the anticipated capacity of the Los Angeles Public Branch Libraries in the local service area (85,002 to 150,000). Under the Proposed Project’s Equivalency Program, the population could increase to 84,904, still below the capacity. The only related Project within the boundaries of the Playa Vista Branch Library is the First Phase Project. With its population of 7,171, plus a 25 percent growth factor, the Proposed Project and the existing service population would be 34,287. This population would not exceed the capacity of the Playa Vista Branch Library and would, in fact, be less than the lower range capacity of the Playa Vista Library of 35,001. Under the Equivalency Program, the population could increase to 34,527, still below the capacity.

The cumulative development would not exceed the capacity of the Los Angeles public libraries within a 2-mile radius of the Proposed Project site and, therefore, would not significantly impact City of Los Angeles Public Library facilities or services. Further, the cumulative population within the service area of the Playa Vista library would not exceed its capacity, and no significant cumulative impacts on the Playa Vista Branch Library would occur. This conclusion is inclusive of the Project’s Equivalency Program and construction of off-site improvements.

---

## **21. ENERGY CONSUMPTION**

### **a. Environmental Impacts**

#### **Construction Impacts**

Because the construction of the Proposed Project would only consume minimal quantities of electricity (i.e., temporary use for lighting, construction trailer office equipment, small power tools, etc.) and is not anticipated to consume natural gas, construction impacts to energy resources would not result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities. As such, construction impacts would be less than significant.

As pertains to the Project's Equivalency Program and off-site improvements, construction activities associated with implementation of the Equivalency Program and off-site improvements, similar to the Proposed Project, would have less-than-significant energy impacts.

#### **Operational Impacts**

Operation of proposed uses would consume an estimated total of 53.01 megawatt hours (MWh) of electricity per day and 484.73 thousand cubic feet (kcf) of natural gas per day. The electricity and natural gas consumption demands estimated for the Proposed Project at buildout are not expected to exceed available supplies or distribution infrastructure capabilities. Additionally, numerous energy conservation measures that go beyond the City's requirements would be incorporated into the design and operation of the Project. Mitigation measures are proposed to require implementation of the Project Design Features, which serve to eliminate potential significant impacts. As such, the Proposed Project would not result in significant impacts related to energy.

Operation of land uses under the Project's Equivalency Program would result in similar energy impacts relative to the Proposed Project, though electricity and natural gas consumption would increase by a maximum of 3082.2 kWh per day (7.7 percent increase) and 33.51 kcf per day (6.9 percent increase), respectively. Operation of the Project's off-site improvements would not require notable quantities of electricity or natural gas. Energy impacts of the Project's Equivalency Program and off-site improvements would be similar to those of the Proposed Project and would be less than significant.

### **b. Recommended Mitigation Measures**

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- The Applicant and builders shall consult with the Los Angeles Department of Water and Power (LADWP) and Southern California Gas Company (SCGC) to maximize gains in building design efficiency & reduce building energy requirements to the extent feasible. Technologies and site design features to be considered include high performance glass (low-e and heat mirror), increased R value insulation, natural ventilation strategies, solar building orientation, daylighting strategies and shade tree planting, which shall be incorporated into the final building plans to the extent feasible.
- All buildings shall employ passive heating and cooling design strategies to the extent feasible. Strategies to be considered include orientation; natural ventilation, including cross-ventilation in residential units; high insulation values; energy efficient windows, including high performance glass; daylighting (in commercial buildings); light-colored or high-albedo (reflective) roofing and exterior walls; window shading; and landscaping that provides shading during the appropriate seasons, especially of the south and west exposures.
- All buildings shall utilize energy efficient mechanical and electrical systems to the extent feasible. Strategies to be considered in commercial buildings include efficient heating, ventilation, and air conditioning (HVAC) equipment; variable air volume systems; air economizer cycles that utilize 100 percent outside air when appropriate; under floor air distribution; and building control systems for lighting, HVAC, and other systems. Strategies to be considered in residential buildings include fans to assist natural ventilation, centralized water and space conditioning systems, high-efficiency individual heating and cooling units, and automatic setback thermostats.
- Solar systems shall be installed to supplement the heating of all swimming pools, as well as hot tubs when provided together with swimming pools, to the extent feasible.
- All residential buildings shall be equipped with Energy Star-rated appliances, where applicable.
- Energy efficient lighting, which exceeds the California Title 24 Energy Efficiency standards to the extent feasible, shall be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are not needed shall also be used to regulate interior lighting for office common spaces, such as conference rooms and bathrooms.
- All fixtures used for exterior lighting of common areas shall be regulated by automatic devices to turn off lights when they are not needed. Energy efficient exterior lighting fixtures, as might be specified by the LADWP, shall be used to the extent such lighting is available and feasible.

- All residential and commercial buildings shall be equipped with electric vehicle charging stations to the extent required by the California Air Resources Board at the time of construction of the given building.
- Shade-producing trees shall be planted at the Proposed Project site to the extent feasible to provide localized, as well as overall, community cooling.
- All buildings shall employ passive heating and cooling design strategies to the extent feasible.
- All buildings shall be designed to accommodate renewable energy sources, to the extent feasible.

### **c. Unavoidable Adverse Impacts**

The Proposed Project would result in a net incremental increase in the amount of non-renewable resources consumed through the use of electricity and natural gas. LADWP, as a public utility, has not experienced electricity supply shortfalls as were experienced during the recent statewide energy shortage, and is anticipated to have ample supplies to meet future demands. No current shortage of natural gas exists, and future shortages are not expected. Energy conservation measures incorporated as Project Design Features would reduce energy consumption from levels that would otherwise occur. The Proposed Project would not result in an increase in demand that exceeds available supply or distribution infrastructure capabilities. Additionally, numerous energy conservation measures that go beyond the City's requirements are proposed to be incorporated into the design and operation of the Project. Therefore, no significant impacts with respect to energy consumption are anticipated to occur. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

### **d. Cumulative Impacts**

The projected electricity and natural gas consumption for the Proposed Project, in conjunction with that of cumulative projects and other background growth, would be approximately 352,004 MWh/yr and 156.1 million cubic feet per month, respectively. Based on existing information from the California Energy Commission relative to projected energy consumption for 2010 (those projections from which affected utilities determine future demand and associated supply requirements), the projected demands on electricity and natural gas consumption from operation of uses within the Proposed Project site, in conjunction with those of the related projects, are anticipated to be within the service capabilities of LADWP and SCGC.

Overall, the Proposed Project, in conjunction with related projects, is not anticipated to result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities; hence, cumulative energy consumption would be a less-than-significant impact.

The cumulative increase in local energy consumption will constitute an incremental increase in the depletion of non-renewable resources. It is anticipated that all projects would, at a minimum, meet state Title 24 energy conservation standards. Based on the requirements for energy efficient design in new development projects (e.g., Title 24 efficiency standards) and the Project Design Features to be implemented as part of the Proposed Project, it is expected that the design of the Proposed Project and related projects would incorporate energy conservation measures that, at a minimum, meet City requirements. Consequently, cumulative impacts relative to energy efficiency would be less than significant. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## **22. WATER CONSUMPTION**

### **a. Environmental Impacts**

#### **Construction Impacts**

During construction within the Urban Development Component, water would be used for dust suppression, the mixing and pouring of concrete, and other construction-related activities. In addition to development construction, the Proposed Project's Habitat Creation/Restoration component would require water for temporary irrigation during plant establishment. This temporary irrigation system would be designed to avoid over-irrigation of the slope areas included within the Proposed Project's bluff restoration program. It is not possible to quantify the water usage attributable to development construction and plant establishment activities with any level of certainty. Water usage for such purposes would, however, be temporary in nature and would not exceed that of the completed development.

Reclaimed water may be used for dust suppression, temporary irrigation, and various construction-related activities, reducing the use of potable water. It is unlikely that such water use would exceed the available supply, given the current and planned utilization of recycled "product" water serving the Proposed Project site and vicinity (i.e., recycled water customers currently consume only about 60 percent of the water treated at WBWRP, and planned expansions will meet, if not exceed projected demands). No significant impact is anticipated to occur due to project construction activities because the water demands associated with such activities are not anticipated to exceed available supplies or distribution infrastructure.

As pertains to the Project's Equivalency Program and off-site improvements, construction activities associated with implementation of the Equivalency Program and off-site improvements, similar to the Proposed Project, would not require notable quantities of potable or reclaimed water and would, therefore, have less-than-significant water consumption impacts.

### **Operational Impacts**

With respect to the operation of uses proposed for the Proposed Project site, an estimated total of 0.50 mgd of potable water and 63,589 gpd of reclaimed water would be consumed on an average day, 0.86 mgd of potable water and 135,275 gpd of reclaimed water on a maximum day, and 1,048 gpm of potable water and 189 gpm of reclaimed water during the peak hour. Based on LADWP's average water demand of 640 mgd projected for the year 2010, for which adequate water supplies are planned, the water consumption associated with the Proposed Project at buildout would represent approximately 0.08 percent of LADWP's future water demand. As indicated by the LADWP in the Water Supply Assessment for the Proposed Project, it is not anticipated that the total estimated water demand of the Project at buildout would exceed available supplies; hence, a less-than-significant impact on water supplies is anticipated.

Implementation of the Proposed Project would not result in significant impacts related to water consumption. The total estimated potable water demand for the Proposed Project at buildout is not anticipated to exceed available supplies planned by LADWP. With implementation of water distribution system improvements currently planned by LADWP, the water service needs for the Proposed Project would not exceed distribution infrastructure capabilities. Development of the Proposed Project would not exceed the growth projections of the Westchester-Playa del Rey Community Plan, as such projections were used in the planning for future water supplies to meet regional needs. Additionally, the Proposed Project includes a number of water conservation design features that reduce or offset water service impacts. Such features include, but are not limited to, requirements for the use of water-efficient appliances and flow control devices, as well as the use of reclaimed water for irrigation and for certain aspects of non-residential building operations.

Operation of land uses under the Project's Equivalency Program would result in similar water consumption impacts relative to the Proposed Project, though water consumption would increase by a maximum of 0.024 mgd on an average day and 0.040 on a maximum day (4.7 percent increase). Operation of the Project's off-site improvements would consume negligible quantities, if any, reclaimed water. As such, water consumption impacts of the Project's Equivalency Program and off-site improvements would be similar to those of the Proposed Project and would be less than significant.

---

**b. Recommended Mitigation Measures****Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of any building permit, on- and off-site water infrastructure for potable and recycled water necessary for the development approved under such permit shall be constructed or suitably guaranteed, satisfactory to the City of Los Angeles' Department of Water and Power, Department of Public Works, and Department of Transportation; California Department of Health Service and Department of Transportation (Caltrans); and the West Basin Municipal Water District, as applicable. Off-site water infrastructure shall consist of construction of a regulator station south of the Jefferson Boulevard/Mesmer Street intersection and provision of design and construction fees to provide a back-up source of emergency water supply to serve the project area.
- The Project shall install low-flow toilets, low-flow showerheads, low-flow fixtures, and Energy Star-rated appliances (dishwashers and washing machines, if built in), where applicable.
- In office, retail, and other public buildings, water faucet fixtures with activators shall be installed that automatically shut off the flow of water when not in use.
- If available, reclaimed water shall be used for irrigation, office building toilet flushing, and office building cooling towers.
- Compliance with all applicable water conservation ordinances (No. 170,978 and subsequent ordinances) shall be required.
- Automatic sprinkler systems shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

**c. Unavoidable Adverse Impacts**

The total estimated water demand for the Project at buildout is not anticipated to exceed available supplies or distribution infrastructure capabilities (i.e., water infrastructure), or exceed the projected employment, housing, or population growth projections of the applicable Community Plan, as assumed in the planning for future water infrastructure needs. Therefore, no significant unavoidable adverse impacts relative to water consumption are expected to occur.

These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

#### **d. Cumulative Impacts**

The projected potable water consumption for the Proposed Project in conjunction with that of cumulative projects within the LADWP service area and other background growth would be 4.81 mgd on an average day, 8.17 mgd on a maximum day, and 10,015 gpm during a peak hour. This would represent an increase of approximately 0.8 percent in LADWP's average daily water demand of 640 mgd (daily average consumption, normal year) projected for the year 2010. Major improvements necessary to provide adequate service to the Proposed Project have been previously identified by LADWP; as such, off-site water system infrastructure is anticipated to be adequate to meet the water demands of the Proposed Project by 2010. It is uncertain, however, if such improvements have also been identified for the cumulative projects and other background growth addressed herein, since many of the related projects are located outside of the LADWP service area. As such, development of the cumulative projects and other background growth would have a potentially significant impact on the local infrastructure. However, this impact would be mitigated by the City requirement that, prior to issuance of a building permit, all projects must demonstrate that adequate distribution infrastructure exists to serve projected demand. If such adequacy cannot be demonstrated by the project applicant, the project cannot connect to the LADWP water distribution system, thereby avoiding a significant impact. As discussed previously, the planning for future water supplies to meet regional needs is based primarily on growth assumptions reflected in local general plans. The level of development associated with the cumulative projects is within SCAG regional growth projections for the area. As such, the potable water demand associated with such development has been accounted for in existing regional water supply planning programs, and no significant cumulative impact to regional water supply is considered to occur. However, at the local level, the population, housing, and employment growth projections reflected in the applicable Community Plan (i.e., the Westchester-Playa del Rey Community Plan) would be exceeded in 2010 by 77.4 percent, 149.9 percent, and 73.0 percent, respectively, based on the growth associated with the Proposed Project and other related projects within the Community Plan area. (see Section IV.J, Population, Housing and Employment, for a detailed discussion of growth projections). Therefore, although no significant cumulative impact to regional water supply would occur, the cumulative impacts of the Proposed Project, including the Equivalency Program, relative to local population growth would be considered significant. The Project's off-site improvements would not create additional population or induce population growth directly or indirectly, and would therefore not result in any impacts on water consumption.

LADWP, as a public water service provider, is required to prepare and periodically update a Urban Water Management Plan (UWMP) to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing



development within the City as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of Senate Bill (SB) 610 (Costa) and SB 221 (Keuhl), LADWP is required 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 types of projects subject to the requirements of SB 610 and SB 221 tend to be larger projects (i.e., residential projects with more than 500 dwelling units, shopping centers employing more than 1,000 persons or having more than 500,000 sq.ft. of floor space, commercial office building employing more than 1,000 persons or having more than 250,000 sq.ft. of floor space, etc.) that may or may not have been included within the growth projections of the UWMP. The water supply assessment for such projects, in conformance with the UWMP, 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. Given that the UWMP plans and provides for water supplies to serve existing and projected needs and that the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects have been carefully considered, relative to LADWP’s ability to adequately meet future needs, it is anticipated that LADWP will be able to supply the demands of the Proposed Project and related projects through 2010 and beyond. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project’s off-site improvements.

## **23. WASTEWATER**

### **a. Environmental Impacts**

#### **Construction Impacts**

During construction of the Proposed Project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer’s capacity is already constrained or that would cause a sewer’s capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Therefore, no significant impact is expected to occur. As such, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

As pertains to the Project’s Equivalency Program and off-site improvements, construction activities associated with implementation of the Equivalency Program and off-site

improvements, similar to the Proposed Project, would not generate notable quantities of wastewater and would, therefore, have less-than-significant wastewater impacts.

### **Operational Impacts**

With respect to the operation of uses proposed for the Proposed Project site, an estimated average total of 0.47 million gallons per day (mgd) and a peak flow of 1.12 mgd of wastewater would be generated. These projected wastewater flows would be conveyed to the existing facilities operated by the City of Los Angeles Department of Public Works (LADPW) Bureau of Sanitation, which has indicated that it will serve the Proposed Project's wastewater collection and treatment needs. Sewers to convey wastewater to LADPW facilities would be constructed on-site to serve the proposed development and would be sized according to projected flows, including peak day flows. The on-site and other local sewers would convey wastewater via the Ballona Creek Pump Station to the North Central Outfall Sewer (NCOS), which is projected to have substantial surplus capacity during peak months in 2010 (i.e., 144 mgd). The estimated 1.12 mgd peak wastewater generation for the Proposed Project, therefore, would use only about 0.8 percent of the projected available peak flow capacity (144 mgd) within the NCOS. Operation of the Proposed Project would contribute an average of 0.47 mgd of wastewater to local conveyance, treatment, and disposal facilities, which would not constitute a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained, or substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements; therefore, impacts would be less than significant. During peak months, the current available treatment capacity to serve the Proposed Project is projected to be exceeded by 20 mgd; however, the Proposed Project would not be allowed to contribute wastewater flows to the local wastewater collection and treatment system unless adequate collection and treatment capacity demonstrably exists to handle such flows, as required by the City's Sewer Allocation Ordinance. The Proposed Project, therefore, could not substantially or incrementally exceed the future scheduled capacity of any one treatment plant (e.g., Hyperion Treatment Plant - HTP) by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As such, the Proposed Project's additional wastewater flows would result in a less-than-significant impact, even during peak months, because Proposed Project-generated wastewater could not enter the Hyperion Treatment System - HTS (i.e., exceed the existing capacity of a treatment plant).

Operation of land uses under the Project's Equivalency Program would result in similar wastewater impacts relative to the Proposed Project, though wastewater generation would increase by a maximum of 0.020 mgd on an average day and 0.048 on a maximum day (4.3 percent increase). Operation of the Project's off-site improvements would not generate wastewater. As such, wastewater impacts of the Project's Equivalency Program and off-site

improvements would be similar to those of the Proposed Project and would be less than significant.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of any building permit, construction of on-site infrastructure improvements necessary for the conveyance of project wastewater to the 42" Marina Interceptor Sewer in Jefferson Boulevard shall be completed, or suitably guaranteed, to the satisfaction of the City Department of Public Works and other applicable responsible agencies.

## **c. Unavoidable Adverse Impacts**

Impacts to the local and regional sewer system would be less than significant, as the Proposed Project is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. The Proposed Project would create an incremental increase in wastewater generation in the City of Los Angeles. The incremental amount of average wastewater generated by the Proposed Project would not be substantial; however, during peak months, even without the development of the Proposed Project, a wastewater treatment deficit of approximately 20 mgd is expected to occur by 2010. The additional wastewater flows from the Proposed Project during peak months could potentially contribute to the exceedance of the future scheduled capacity of the HTP; however, the wastewater flows from the Proposed Project would not be allowed to enter the HTS unless adequate treatment capacity at HTP is demonstrated to LADPW, pursuant to the City's Sewer Allocation Ordinance. Given that the Proposed Project could not contribute to an exceedance of wastewater collection or treatment capacity, impacts would be less than significant. With implementation of mitigation, as well as Project Design Features discussed in Section IV.N(1), Water Consumption, no significant adverse impacts with respect to wastewater are anticipated to occur. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## **d. Cumulative Impacts**

All the related projects are either within the City of Los Angeles or one of its contract agencies (i.e., non-City of Los Angeles jurisdictions that have contracts for discharge of their wastewater into the City of Los Angeles' system for conveyance and/or treatment and are under a contract with the Bureau of Sanitation for wastewater services); as such, it is assumed for the purposes of the cumulative analysis that all the related projects and the Proposed Project would

be serviced by the HTS. The daily average and peak-month wastewater generation for the Proposed Project in conjunction with cumulative projects and other background growth would be 6.97 mgd and 16.72 mgd, respectively, all of which would be treated at HTP.

Cumulative impacts to the local and regional sewer system from implementation of the Proposed Project, related projects, and other background growth would be less than significant, as the Proposed Project and related growth is not anticipated to cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. As discussed previously, the HTS is anticipated to have sufficient capacity to treat projected wastewater flows from the Proposed Project, related projects, and other background growth through 2010, with the exception of peak months, with a projected annual average excess capacity of 14 mgd. The additional wastewater flows from the Proposed Project, related projects, and other background growth during peak months would incrementally exceed the future scheduled capacity of the HTP by generating flows greater than those anticipated in the City's Wastewater Facilities Plan. In addition to the fact that wastewater generated by the operation of the Proposed Project could result in a potentially significant impact, the projected additional deficit anticipated by local and regional jurisdictions for wastewater treatment capacity indicates that there could be a significant cumulative impact. Regardless of whether the Proposed Project is developed, the HTS will experience a projected capacity deficit of approximately 20 mgd during peak flow months. The City of Los Angeles is currently evaluating various means and options for providing additional treatment capacity to meet future needs. The provision of additional treatment capacity in the future would eliminate the potentially significant impact for both Project-related and cumulative wastewater generation. In the meantime, adherence to the City's Sewer Allocation Ordinance would limit the amount of cumulative development that could proceed within the City of Los Angeles prior to such additional treatment capacity being secured. As pertains to those related projects located in jurisdictions other than the City of Los Angeles (which are not necessarily subject to the Sewer Allocation Ordinance), inasmuch as those respective jurisdictions are under service contracts with the Bureau of Sanitation for conveyance and/or treatment of wastewater, it is assumed that the Bureau of Sanitation would consider such flows from these jurisdictions when evaluating the availability of treatment capacity for projects located within the City of Los Angeles. It is anticipated that all contributions to the HTS from the City of Los Angeles and other "member" jurisdictions would be quantified or otherwise included as part of the Bureau of Sanitation's assessment of the availability of sewer and treatment capacity for projects subject to the Sewer Allocation Ordinance. As such, no significant cumulative impacts are expected to occur. These impacts are inclusive of the Proposed Project, the Equivalency Program and the Project's off-site improvements.

---

## **24. SOLID WASTE**

### **a. Environmental Impacts**

#### **Construction Impacts**

In summary, construction activities would generate a total of 10,343 tons of inert waste; however, the Proposed Project would not create a need for additional inert solid waste disposal facilities to adequately handle project-generated inert waste. Thus, construction-related waste would result in a less-than-significant impact.

As pertains to the Project's Equivalency Program and off-site improvements, construction activities associated with implementation of the Equivalency Program and off-site improvements, similar to the Proposed Project, would not generate notable quantities of solid waste aside from temporary generation of minor quantities of inert waste and would, therefore, have less-than-significant water consumption impacts.

#### **Operational Impacts**

Operation of the Proposed Project would generate Class III solid waste (i.e., 9.6 tons per day (tpd) after diversion, or a 0.07 percent increase in overall disposal at the four City-serving landfills) that would require disposal at regional landfills, although diversion and recycling programs would reduce the amount requiring disposal. It is anticipated that the existing landfill disposal capacity available at the four landfills that currently serve the City of Los Angeles may be fully consumed at project buildout in late 2010. The Sanitation Districts of Los Angeles County are, in cooperation with affected jurisdictions, currently pursuing such options to increase future landfill disposal capacity, including expansion of existing landfills, permitting of new landfills, and the use of rail haul. However, there is presently no guarantee that new or expanded disposal facilities will be permitted to operate prior to 2010. Consequently, the Proposed Project would create a need for additional solid waste disposal facilities to adequately handle project-generated Class III waste. Impacts to Class III solid waste disposal facilities would, therefore, be considered potentially significant. Because the Proposed Project could create a need for additional solid waste collection routes to adequately handle project-generated waste, impacts to solid waste collection routes would be considered potentially significant. With implementation of on-site diversion and recycling programs during construction and operation, the Proposed Project would not conflict with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, City of Los Angeles Solid Waste Management Policy Plan, Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Impacts relative to adopted solid waste diversion programs and policies would be less than significant.

Operation of land uses under the Project's Equivalency Program would result in similar solid waste generation impacts relative to the Proposed Project, though solid waste generation would increase by a maximum of 1.091 tpd (5.8 percent increase). Operation of the Project's off-site improvements would generate negligible quantities, if any, of solid waste. As such, solid waste generation impacts of the Project's Equivalency Program would be similar to those of the Proposed Project and would be potentially significant, due to the projected landfill capacity shortfall. Solid waste generation impacts of the Project's off-site improvements would be reduced relative to the Proposed Project and would be less than significant.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- All buildings constructed or uses established within any part of the site shall be designed to be permanently equipped with clearly marked, durable, commingled recyclables bins at all times to facilitate the separation and deposit of recyclable materials therein by tenants and groundskeepers; and the placement of, and approaches to, such bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to off-site recycling facilities, in a manner satisfactory to the City Department of Public Works, prior to issuance of building permits.
- The Applicant shall execute a covenant satisfactory to the City Planning Department which shall obligate the owner, lessee, heirs, assigns, or successors to: continuously maintain in good order for the convenience of tenants, clearly marked, durable and separate bins on the same lot or parcel to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.
- The Applicant and its successors, including future buyers or lessees of the property, heirs, and assigns, shall comply with applicable existing and future regulations and procedures for the collection and disposal of household hazardous waste, providing such future compliance does not conflict with existing tract map requirements.
- The Applicant and its successors, including future buyers or lessees of the property, heirs, and assigns, shall be required to implement a recycling program for demolition and construction debris, where economically feasible, to the satisfaction of the City

Departments of Public Works, Building and Safety, and/or City Planning, as applicable.

- Recycled materials, including drywall, steel, aluminum, ceramic tile, cellulose insulation, and composite engineered wood products, shall be incorporated into building design and construction where economically feasible and where compatible with design objectives.
- Determination of new solid waste collection routes shall be coordinated with existing collection routes in the project area, depending on the waste haulers serving the Proposed Project site.

### **c. Unavoidable Adverse Impacts**

The Proposed Project would create an incremental increase in solid waste disposal in the City of Los Angeles. Construction of the Proposed Project would not result in an increase in inert solid waste generation that would create a need for additional inert solid waste disposal facilities to adequately handle project-generated inert waste. Thus, construction-related waste would result in a less-than-significant impact. Operation of the Proposed Project would generate an estimated 9.6 tons per day of Class III solid waste (3,504 tons per year), which would require landfill disposal. This additional refuse will add to the demand for a comprehensive, long-term solution for solid waste disposal. It is anticipated that the existing landfill disposal capacity available at the four landfills that currently serve the City of Los Angeles may be fully consumed by late 2010. Despite efforts to site and permit solid waste disposal facilities, there is presently no guarantee that new or expanded disposal facilities will be permitted prior to 2010. Consequently, the Proposed Project would result in an increase in solid waste generation (i.e., a 0.09 percent increase in overall disposal at the four City-serving landfills) that would create a need for additional Class III solid waste disposal facilities to adequately handle project-generated waste. Therefore, impacts to Class III solid waste disposal facilities would be considered a significant unavoidable adverse impact.

Additionally, the Proposed Project could create a need for additional collection routes to adequately handle project-generated waste; however, the mitigation measure identified above would reduce the impact to a level less than significant.

The Proposed Project would not conflict with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, City of Los Angeles Solid Waste Management Plan (CiSWMPP), Framework Element, or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE. Consequently, impacts relative to adopted solid waste diversion programs and policies would be less than significant.

These impacts are inclusive of the Proposed Project, the Equivalency Program and the Project's off-site improvements.

#### **d. Cumulative Impacts**

The projected inert waste from construction of the Proposed Project, in conjunction with that from construction of related projects throughout the Los Angeles region and other background growth, would be approximately 155,500 tons. This amount of inert solid waste would be generated over a number of years, as in the case of the Proposed Project, whereas the daily increase in inert waste disposal at inert waste landfills in the Los Angeles region would be a small percentage of the total amount, the specific amount of which is dependent upon the respective construction schedules of the related projects. Nonetheless, given the inert waste disposal capacity (1995) within Los Angeles County of 53.1 million tons, the total cumulative construction-related inert waste (155,500 tons) would represent 0.3 percent of the total inert disposal capacity in the region. The Proposed Project in conjunction with related projects and other background growth would not create a need for additional inert waste disposal facilities to adequately handle project-generated inert waste.

The projected Class III solid waste generation for the Proposed Project in conjunction with that of related projects located within the City of Los Angeles (i.e., projects within the City of Los Angeles that would utilize the four City-serving landfills discussed above) and other background growth would be 611.9 tpd. The volume of Class III solid waste generated by the Proposed Project, related projects, and other background growth would adversely impact regional landfill capacity. The potential impacts will be partially offset by ongoing efforts and programs involving waste diversion and recycling. It is anticipated that such diversion and recycling as related to cumulative development and other background growth will occur primarily through local jurisdictional requirements for new development. Assuming a similar level of waste diversion is applied to the waste streams of the related projects (49.3 percent diversion), which is generally consistent with the requirements of Assembly Bill (AB) 939 that all cities and counties achieve a 50 percent diversion rate by 2000, approximately 310.2 tpd would require landfill disposal. These impacts are inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

## **25. VISUAL QUALITIES (AESTHETICS AND VIEWS)**

### **a. Environmental Impacts**

The analysis of impacts on visual qualities addressed two visual qualities of the environment: Aesthetics and views.



## **Aesthetics**

The analysis of the Proposed Project's impact on aesthetics addressed three aesthetic topics: impacts on valued resources, impacts on the visual character of the surrounding area, and impacts regarding the regulatory setting in which the Project's impacts would occur.

### **Impacts on Valued Resources**

The Proposed Project's Urban Development Component includes 99.3 acres of mostly undeveloped area in a somewhat degraded/unnatural state within an area of urban development. This undeveloped land has resource value as it provides relief from urban development for local residents and travelers along Jefferson Boulevard and offers a view of the Westchester Bluffs from certain vantage points.

Development of the Proposed Project would place urban development within large portions of the Proposed Project site. It would alter the current undeveloped appearance of the site to one of urban development. This would be a substantial alteration of the visual character of the Proposed Project site, and cause a loss of views of the Westchester Bluffs. These impacts are considered significant.

### **Impacts on Visual Character of the Surrounding Area**

The Proposed Project would alter the character of the Project site, converting its undeveloped appearance to that of a mixed-use community. The Proposed Project site currently has an altered and somewhat degraded appearance. The site is currently used as a staging area for construction equipment, soil storage, and as temporary detention basin used in developing the Playa Vista First Phase Project. Much of the Project site lacks vegetation or other aesthetic treatments and is currently in a visually degraded state.

The resulting appearance of the Project for local residents and travelers north of the area would be shaped by the Project features facing Jefferson Boulevard. These include the predominantly residential, although in some cases mixed, uses which could be up to 95 feet AMSL (approximately 68 to 72 feet above finished grade). The appearance of the Project site from Jefferson Boulevard would be shaped by the vegetated parkway and adjacent slopes with intermittent retaining walls lying beyond the parkway and the landscaped edge of development and setbacks atop the slopes. Development along Jefferson Boulevard could be taller than some of the existing uses on that corridor, but would still be mid-rise in nature, and would have impacts which are softened by the landscape buffering of buildings. The Project would replace the existing, degraded vegetation and disturbed appearance of the Project site with new landscaping and development. Therefore, the Proposed Project would result in a less than

significant impact, as it would not contrast substantially with neighboring development along Jefferson Boulevard nor cause a degradation of the developed character of the area.

The Project height limits designated for the southern edge of the Proposed Project site are restricted to a level well below the edge of the bluffs (with heights up to 112 feet AMSL versus the 140 foot (AMSL) heights along the top of the bluffs) and would not alter the character of the residential or University uses atop the bluffs. Areas adjacent to the Proposed Project site on the east and west include lands approved for development and partially developed, with residential development under construction further west, and the existing light industrial uses to the east of the Proposed Project site. These areas are being developed with Playa Vista First Phase mixed use development to the west and the Campus at Playa Vista to the east. Residents atop the bluffs would see an in-fill development, punctuated by open space, blending with surrounding uses.

The aesthetic impacts of the proposed development would be lessened by the following: (1) the height limits and lot coverage restrictions; (2) landscaping throughout the public and private open space areas; (3) the park areas distributed throughout the Project site; (4) restored bluff faces; and (5) an open space area at the foot of the bluffs, which would be improved and integrated visually with the adjacent, First Phase Riparian Corridor. The Bluffs and Riparian Corridor within the Proposed Project's Habitat Creation/Restoration component would add an important aesthetic amenity to the area which would be visible from portions of the bluff edge and to travelers along Bluff Creek Drive (formerly known as Teale Street).

The various Project Design Features described above would result in a less-than-significant impact, as they would address existing degraded conditions on the site and would not contrast with the visual character of the surrounding development so as to cause a degradation of the environment.

Development of the Proposed Project would also cause changes in the aesthetic conditions of the Project site during the time of construction. Construction would occur over several years. Activities would include grading of the site, provision of infrastructure/streets, the sequential addition of buildings, and, finally, the provision of landscaping and other aesthetic treatments. During Proposed Project development, the site's current construction-like appearance would be expanded. Construction impacts would be of a temporary and unavoidable nature and would be typical of aesthetic impacts caused by construction of other projects. Potential impacts would be reduced limited viewing conditions. Impact from construction activities would be less than significant.

---

## **Impacts Regarding the Regulatory Setting**

The Proposed Project includes design standards that would be implemented through amendments to the Area D Specific Plan and as Conditions of Approval to the Project's Tract Map. The Applicant proposes to establish design criteria that are comparable to the existing standards.

Additional standards are proposed to address such items as building materials, screening of mechanical equipment, etc., within the Proposed Project areas. The design requirements of the Area D Specific Plan pertain to design characteristics which are applicable to the design of individual building projects and which can be implemented during the plan check stage in the development review process. Specific plan requirements would be implemented during plot plan review. Therefore, implementation of the Project would result in a less-than-significant impact with regard to the regulatory framework as it would not preclude the attainment of existing aesthetic regulations.

## **Impacts of Off-Site Improvements**

Proposed Project development could result in secondary impacts arising from implementation of the Project's mitigation measures, as well as the direct impacts described above. Impacts could occur due to the reductions in landscaping at some location where road widening would be required to implement the Project's recommended mitigation measures.

These impacts are limited as the off-site improvements are located in urban developed areas, and the areas affected would be small. The most notable impacts would occur along the Centinela Corridor that is proposed for roadway. Improvements at the intersections of Culver Boulevard and Inglewood Boulevard and Culver Boulevard and Centinela Avenue would result in small reductions in the landscaped median between North and South Culver Boulevards.

The design of the roadway improvements includes re-landscaping of affected parkway and median areas and the planting of new trees. Mitigation measures are proposed that would reduce potential impacts. The implementation of the off-site improvements would not substantially alter the visual character of their surrounding areas, and their impacts would be less than significant.

## **Views**

The analysis of impacts on specific views identified view impacts which would occur with implementation of the Proposed Project and which are unavoidable effects of the Project. The Project's off-site improvements would have no effects on views nor would they contribute to

a cumulative impact on views. The impacts from the various view locations would be as follows:

- **Westchester Bluffs:** The Proposed Project site's undeveloped character would take on a developed appearance, moving the edge of the cityscape closer to the foot of the bluffs. However, the Proposed Project would not interfere with the panoramic views along the Westchester bluffs. Buildings would vary in height but would not exceed 112 feet AMSL, which is approximately 28 feet below the approximate average height of the bluffs at 140 feet AMSL. For the most part, building tops would blend with surrounding development and would not substantially alter existing views. Viewers at the easternmost end of the Bluffs could have their long-range view slightly foreshortened but would still see the ocean and marina entryway. These impacts are considered less than significant, as Project development would not substantially obstruct an existing view of a valued view resource from a prominent view location.
- **Mixed-Use Areas North of the Project Site:** Views over the Proposed Project site, toward the bluffs, would be altered for some offices and residential units along Jefferson Boulevard. Lesser view impacts would occur from more distant public and private locations. As the loss of bluff views is substantial from some locations, e.g. along Jefferson Boulevard, the impact on views of the bluffs has been identified as a significant impact.
- **Jefferson Boulevard Thoroughfare:** Views of the Westchester Bluffs would be altered for travelers along Jefferson Boulevard and replaced with new development. Impacts would be somewhat off-set by Project design features (e.g., landscaped slope along Jefferson Boulevard and new views for travelers along Bluff Creek Drive). Nonetheless, there would be a substantial obstruction of a prominent view resource from a prominent (i.e., public roadway) location, and impacts on views along Jefferson Boulevard would be significant.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to recordation of tract maps, parks/open space and major open space areas, such as the riparian corridor and bluffs, shall either be designated as open space on final tract maps or committed to open space through recorded deed restrictions and covenants, subject to the approval of the Advisory Agency.

- All rooftop structures (including mechanical equipment), garbage dumpsters, and other unsightly equipment, shall not be visible from the adjoining street.
- Open areas not used for streets, walkways, plazas, and other hardscape areas or driveways shall be landscaped. Structures which face onto public thoroughways shall be attractively landscaped with a landscape plan prepared by a licensed landscape architect, and shall be subject to review and approval from the Planning Department and Bureau of Street Maintenance, Street Tree Division.

### **Other Mitigation Measures for the Off-Site Improvements**

- Existing trees affected by construction at off-site locations shall be relocated in proximity to their current locations if sufficient space is available. If trees cannot be located in immediate proximity, then trees shall be replaced at alternate locations in a public parkway location with similar specimens at a ratio of not less than one-to-one.
- Landscaping plans shall be prepared for each of the off-site road improvements that impact landscaping and shall be submitted to the appropriate regulatory agencies for approval.

### **c. Unavoidable Adverse Impacts**

#### **Aesthetics**

Proposed development, inclusive of the Equivalency Program, would alter the existing character of the site from predominantly undeveloped, vacant land to a developed appearance. This would result in a loss of visual relief amidst the urban environment, a valued resource. Although the site has a disturbed appearance, with remnants of past use, the loss of the visual relief, including views of the Westchester Bluffs, is considered a substantial alteration of the site and a significant impact. The proposed development would replace the existing degraded site conditions (construction activities, power lines, ruderal vegetation, and remnants of past use) with a development offering a planned arrangement of buildings surrounded by newly landscaped slopes, buffers, and open space areas. The Proposed Project would provide a continuity of design between the eastern and western portions of the Playa Vista First Phase Project. The bluffs separate the proposed development from the communities to the south. Proposed development would have massing characteristics that are compatible with existing, adjacent development to the north. Therefore, the change in the aesthetic character of the site would be less than significant, as the Proposed Project would not contrast with the visual character of the surrounding development so as to cause a degradation of the environment. During construction, short-term, non-significant impacts would occur to the aesthetic character of the site. These impacts would be experienced by a few private viewers along the edge of the

bluffs, a few private locations north of the Project site, and along Jefferson Boulevard, a public thoroughfare. These conditions would cease as new development projects are completed.

In addition to these impacts, implementation of the Project's off-site mitigation improvements would result in small reductions in the amount of landscaping at some roadway widening locations. Also, construction activities at these locations would have short-term impacts on the aesthetic character of those locations. These impacts associated with the off-site improvements would be less than significant.

### **Views**

The analysis of impacts on specific views identified view impacts which would occur with implementation of the Proposed Project and which are unavoidable effects of the Project. The Project's off-site improvements would have no effect on views nor would they contribute to a cumulative impact on views. The impacts from the various view locations would, for the most part, be limited. Viewers atop the Westchester Bluffs would continue to have panoramic views over the Project site. The Proposed Project site's undeveloped character would take on a developed appearance, moving the edge of the cityscape closer to the foot of the bluffs.

Views over the Proposed Project site, toward the bluffs, from development to the north, would be limited due to constrained viewing conditions. However, views of the Westchester Bluffs would be directly altered for travelers and some private locations along Jefferson Boulevard and replaced with new development. Impacts would be somewhat off-set by Project design features (e.g., landscaped slope along Jefferson Boulevard and new views for travelers along Bluff Creek Drive). In addition, bluff views would be altered to a lesser extent at some more distant private and public road locations. The loss of bluff views from some locations would be substantial and considered a significant impact.

#### **d. Cumulative Impacts**

Except as described below, new development from related projects is essentially outside of the Proposed Project's visual setting in which cumulative impacts could occur. Related projects would contribute further to the loss of visual relief in the urban setting, an impact that is designated as significant for the Proposed Project alone and would, hence, be cumulatively significant, as well.

With regard to the general appearance of new development, Related Project 40, the Playa Vista First Phase Project, would increase the developed appearance of lands adjacent to the east and west of the Proposed Project site. Implementation of the Playa Vista First Phase Project would lessen the marginal impact of the Proposed Project; and the two Projects together would

cause a greater alteration to the aesthetic character of the area than either would alone. The First Phase Project, like the Proposed Project, would include landscaping and other design features to maintain a continuity of design and avoid a degradation of the aesthetic character of the area. Therefore, cumulative impacts on aesthetic character from the related projects, in combination with the Proposed Project, would be less than significant. This conclusion is inclusive of the Proposed Project, the Equivalency Program, and the Project's off-site improvements.

With regard to cumulative effects arising from regulations controlling the implementation of related projects, there are no known planned amendments that would alter the conclusions regarding the cumulative effects described above for views and aesthetics. Individual related projects noted above have been or would be subject to environmental review under CEQA and have been or would be reviewed for compliance with their applicable regulatory guidelines.

With regard to view impacts, the Playa Vista First Phase Project would contribute to the Proposed Project's view impacts that would reduce views of the Westchester Bluffs for travelers along Jefferson 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.

With regard to the views from the top of the Westchester Bluffs, the First Phase Project would contribute with the Proposed Project to an alteration of the near-view site appearance, but would not substantially obstruct the panoramic views available from the top of the bluffs. The Project's off-site improvements would have no effect on views, nor would they contribute to a cumulative impact on views.

## **26. PALEONTOLOGICAL RESOURCES**

### **a. Environmental Impacts**

This Proposed Project would include the placement of new buildings throughout the Project site and require grading to accommodate the development proposed. Potential impacts to paleontological resources could occur if there is excavation or covering of sites which contain the Holocene alluvium that underlies the Project site or the Palos Verdes Sand rock units south of the proposed development area in the Project's Habitat Creation/Restoration Component.

The Project would include restoration activities in the areas of the Palos Verdes Sand, but not building placement. Buildings would occur over areas underlain with Holocene alluvium. This soil unit is considered to have a high impact potential at depths below the water table. As the Proposed Project would involve excavation into this soil, any resources that may be encountered and not made available for recovery and evaluation could be destroyed. The

Proposed Project could also expose or facilitate access to fresh exposures of fossiliferous rock units and create a potential for unauthorized fossil collecting. Therefore, the project could result in the permanent loss of paleontological resources and a significant impact could occur.

Beyond, these potential resource impacts resulting from construction activities, the placement of buildings within the Project site would cover substantial portions of the Project site and could, thereby, limit future access to excavations within the Holocene alluvium lying below the water table at some locations. Such ground coverage is not likely to have an actual effect on resources, due to a number of mitigating factors: (1) any potential resources would remain undisturbed, in situ; (2) large areas of the Project site would remain accessible for future excavation/boring into this soil unit (e.g., habitat creation/restoration areas, parks and private open space); (3) there are no known resources lying below the Project buildings; and (4) there is currently no desire or impetus from the scientific community to perform research at the Proposed Project site, and Proposed Project excavations provide an opportunity to discover resources, should they be present.

However, the placement of the buildings at some locations could limit future access to the Holocene alluvium lying below the water table, which has been identified as having high resource potential. Therefore, a potentially significant impact could occur as there could be a potential loss of access to a paleontological resource. However, access to potential resources underlying the Project site would continue to be available within large portions of the Project site, including the park and landscaped areas throughout the Urban Development Component area, as well as the Project's Habitat/Restoration Component area, allowing continued access at these locations. Mitigation measures are proposed to reduce potential impacts.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to issuance of grading/excavation permits, a qualified paleontologist shall be retained to develop an acceptable monitoring and treatment plan and to monitor construction activities at the Project site that might adversely impact potential paleontological resources in the Proposed Project area. The qualifications of the paleontologist and its designee shall be evaluated, and the development of the monitoring and treatment plan shall be made in consultation with the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles County to ensure Project compliance with Society of Vertebrate Paleontology standard guidelines as appropriate.
- A monitoring and treatment plan for paleontological resources shall include the following measures:



- A qualified paleontologist or qualified designee shall monitor ground-disturbing activities at the Project site on a full-time basis along the lower part of the bluff where the Palos Verdes Sand would be disturbed. Monitoring shall consist of visually inspecting fresh exposures of rock for fossil remains large enough to be seen and, where appropriate, collecting and processing rock samples or excavated spoils to allow for the recovery of smaller fossil remains that are too small to be seen in the field.
- If auguring or excavation is implemented in the alluvium of the Project site north of the bluff and extends to a depth below the water table, a qualified paleontologist or qualified designee shall monitor these activities on a full-time basis. Excavation or auguring in the alluvium at a depth above the water table shall be monitored on a half-time basis. Monitoring shall not be implemented until these activities have penetrated 5 feet of previously undisturbed strata under any artificial fill
- If fossil remains large enough to be seen are uncovered by earth-moving activities, a qualified paleontologist or qualified designee shall divert these activities temporarily around the fossil site until the remains have been recovered, a rock sample has then been collected to process to allow for the recovery of smaller fossil remains, if warranted, and construction has been allowed to proceed through the site by a qualified paleontologist or qualified designee. If potentially significant resources are encountered, a letter of notification shall be provided in a timely manner to the Department of City Planning, in addition to the report (described below) that is filed at the completion of grading.
- A qualified paleontologist or qualified designee shall collect all identifiable vertebrate fossil remains and samples of megainvertebrate fossil remains. All fossil sites shall be plotted on a topographic map of the Project site.
- If a qualified paleontologist or qualified designee is not present when fossil remains are uncovered by earth-moving activities, these activities shall be stopped, and a qualified paleontologist or qualified designee shall be called to the site immediately to recover the remains.
- At a qualified paleontologist or qualified designee's discretion and to reduce any construction delay, a construction worker shall assist in removing fossiliferous rock samples to an adjacent location for temporary stockpiling pending eventual transport to a laboratory facility for processing.
- A qualified paleontologist or qualified designee shall conduct the processing (wet and/or dry screening and heavy-liquid flotation) of the rock samples to allow for the recovery of smaller fossil remains. Additional rock samples shall be collected from a fossil site considered sufficiently productive to warrant processing. However, no more than 6,000 pounds each from either the Palos Verdes Sand or the alluvium will be processed (12,000 pounds total).

- All fossil remains recovered in the field as a result of monitoring or by processing rock samples shall be prepared, identified, catalogued, curated, and accessioned into the fossil collections of the Natural History Museum of Los Angeles County or another museum repository complying with the Society of Vertebrate Paleontology standard guidelines. Accompanying specimen and site data, notes, maps, and photographs also shall be archived at the repository.
- Within 6 months following completion of the above tasks, a qualified paleontologist or qualified designee shall prepare a final report summarizing the results of the mitigation program and presenting an inventory and describing the scientific significance of any fossil remains accessioned into the museum repository. Moreover, any site or geologic data indicating the possible presence and locations of additional fossil sites underlying the Project site will be discussed in the report so that future access to these sites will be maintained in the event of any future demolition, alteration, or removal of buildings built in connection with the Project. The report shall be submitted to the City of Los Angeles Planning Department and the museum repository. The report shall comply with the Society of Vertebrate Paleontology standard guidelines for assessing and mitigating impacts on paleontological resources.

### **c. Unavoidable Adverse Impacts**

The recommended mitigation measures and associated potential to provide paleontologic benefits, as well as the possibility that potential paleontologic resources within the open space portions of the Proposed Project area would remain undisturbed and accessible to scientific investigation, lessens potential impacts. The Proposed Project's potential adverse impacts to paleontologic resources from construction activities, inclusive of the Equivalency Program and the off-site improvements, is expected to be reduced to a less-than-significant level since there would not be a permanent loss of a paleontological resource by allowing for the recovery of some remains and data, thereby ensuring their preservation in a museum and their availability for future study by qualified investigators.

As paleontological resources may occur below the Project site in soils having a high paleontologic impact potential, the long-term placement of buildings on the Project site, under both the Proposed Project and the Equivalency Program, would limit but not ultimately preclude future access. Further, the paleontological treatment plan requires the archiving of any data regarding the extent and location of any potential resources. The Project's off-site improvements would not limit future access to any potential paleontological sites. Therefore, the Project's impact on paleontological resources after mitigation is not considered to be significant.

#### **d. Cumulative Impacts**

The Proposed Project, in combination with other projects in the region where a project site is underlain by the Palos Verdes Sand or alluvium, might lead to cumulative impacts on paleontologic resources. These impacts could include the loss of paleontologic resources as a result of earth-moving activities and unauthorized fossil collecting, as well as the loss of access to these resources where they are covered by the construction of new buildings.

However, the Proposed Project would not result in a loss of access to the Palos Verdes Sand at the foot of the Westchester Bluffs, and therefore there would be no cumulative impact on the paleontologic resources of the Palos Verdes Sand. Moreover, lands in the Project vicinity, including some areas within the Proposed Project site, the Playa Vista First Phase Project site, and in the areas west and north of the First Phase Project would remain undeveloped. These areas underlain by alluvium remain accessible. Continued access to these areas would substantially reduce the cumulative impact of the Proposed Project on paleontologic resources.

It is expected that the City of Los Angeles policies for the protection of paleontological resources, and mitigation for related projects via CEQA review would be implemented. In addition, the Project's mitigation measures would reduce potential cumulative impacts. By allowing for the recovery of some fossil remains that would not have been exposed without the Proposed Project site and continued access to some areas underlain by the alluvium, as well as the implementation of mitigation measures, cumulative impacts inclusive of the Proposed Project would be less than significant. This conclusion applies to the Proposed Project, the Equivalency Program, and construction of off-site improvements.

## **27. ARCHAEOLOGICAL RESOURCES**

### **a. Environmental Impacts**

Both the Urban Development and Habitat Creation/Restoration components of the Proposed Project include activities that would cause earth disturbance in areas that may contain cultural resources. Construction-related activities, including grading and excavation for underground parking, open space, and other development, could disturb or destroy archaeological sites and artifacts or encourage unauthorized collection. Impacts would be significant if any archaeological or historical resources were disturbed or removed without an analysis of their cultural significance or without documentation of their context in relation to the surrounding environment.

The Project site, based on past investigations, is known to contain archaeological and/or historical resources of note. As such, development of the Proposed Project is subject to the provisions of a Programmatic Agreement developed for the Playa Vista Project among the U.S.

---

Army Corps of Engineers, the California State Historic Preservation Office (SHPO), and the Federal Advisory Council of Historic Preservation.

Some of the archaeological sites on the Proposed Project site, as well as throughout the Ballona region, have been evaluated as eligible for listing in the National Register of Historic Places as a historic district. This district has been named the Ballona Lagoon Archaeological District. Sites formally recorded within the proposed district that are included in, or overlap a portion of, the Proposed Project site include CA-LAN-62, CA-LAN-211/H, CA-LAN-1932H, and CA-LAN-2769. Of these cultural loci, only CA-LAN-211/H and CA-LAN-62 have been determined to be eligible for listing in the National Register. Based on the completed archaeological evaluations, beyond the sites within the District, no other potential archaeological site within the Project site is eligible for the California Register as a historical archaeological resource.

Project impacts on potential on-site archaeological resources would occur during excavation and grading activities. Disturbance of burial remains or associated artifacts could result in significant impacts to these cultural resources for Native Americans. Other aspects of Project construction and/or Project operations would not have an adverse impact on potential on-site resources. As part of the Project, the Applicant is proposing that encountered resources would be evaluated and treated per the protocols established in the Programmatic Agreement and Archaeological Treatment Plans for CA-LAN-62 and CA-LAN-211/H. Such evaluation and treatment would allow for scientific discovery and contributions to the body of knowledge regarding California and American prehistory and history. The evaluation and treatment undertaken pursuant to these requirements would preclude, through approved and required mitigation techniques, significant impacts from the disturbance, damage, or degradation of unique archaeological resources or archaeological historic resources that may be encountered. Furthermore, the riparian corridor has been designed to ensure that sections of the significant archaeological sites along the bluffs are preserved. These will be protected within the open space designated as part of the riparian corridor. The corridor itself, however, cannot be placed in such a way as to avoid all portions of these archaeological sites and still function as a hydraulic feature. With the implementation of the Project Design Features impacts would be reduced to a less-than-significant level.

As of this date, five Archaeological Treatment Plans (ATPs) have been approved by the USACE, the State Historic Preservation Officer, and the Federal Advisory Council on Historic Preservation. These five ATPs have been implemented. Of these, one is for a site located within the Proposed Project area, and the remaining four are for off-site locations in the vicinity of the Proposed Project. The ATP within the Proposed Project site was prepared in 1991 and involved CA-LAN-62 and CA-LAN-211. Subsequently, it was found that, as previously defined, CA-LAN-62 and CA-LAN-211 were one large site. This combined site is now referred to as CA-LAN-62. The designation CA-LAN-211 was reused for another archaeological site in the Proposed Project site. A new ATP has been prepared for the newly designated site,

CA-LAN-211/H, and is currently under review by the USACE, the State Historic Preservation Officer, the Advisory Council on Historic Preservation, and two groups representing the Gabrielino Indians.

## **b. Recommended Mitigation Measures**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- Prior to the issuance of any grading/excavation or building permits (except for grading/excavation permits associated with archaeological investigations) which may affect the properties designated as LAN-211/H and LAN-62, the measures required within the approved Archaeological Treatment Plans for these properties, which have been determined eligible for listing in the National Register of Historic Places and accepted by the U.S. Army Corps of Engineers, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation shall be implemented. The archaeological treatment plans shall be consistent with the following: the Secretary of Interior Guidelines for Archaeological Documentation; the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format, and Guidelines for Archaeological Research Designs; the Department of the Interior's Guidelines for Federal Agency Responsibilities under Sections 106 and 110 of the National Historic Preservation Act; and take into account the Council's publication, Treatment of Archaeological Properties – A Handbook.
- Prior to issuance of grading/excavation or building permits, a professional archaeologist who meets the Secretary of Interior's guidelines and is listed in the Register of Professional Archaeologists shall be retained to implement the Research Design and comply with the Programmatic Agreement.
- Historic resources eligible for listing in the National Register of Historic Places shall be avoided or unavoidable disturbance be mitigated through data recovery, documentation, analysis, and curation. Archeological treatment plans required by the Programmatic Agreement shall be developed and implemented, as applicable. All materials and records resulting from implementation of the Programmatic Agreement shall be curated in accordance with 36 Code of Federal Regulations part 79.
- In addition to a qualified archaeologist, a representative of the Gabrielino Indians shall be retained to monitor subsurface archaeological excavations. Prior to issuance of grading or building permits, evidence shall be provided for placement in the subject file with the City Planning Department that a Native American monitor has been retained.

- In the event that previously unknown archaeological and historical resources are discovered during construction, grading/excavation/construction shall temporarily be halted. The U.S. Army Corps of Engineers and the State Historic Preservation Officer shall immediately be notified to provide these agencies with the opportunity to assess the resources and offer recommendations for treatment required by the Programmatic Agreement.
- The Project archaeologist shall monitor ground disturbing activities in areas where significant archaeological or historical materials are discovered or detected. If cultural resources are discovered during grading/excavation/construction monitoring, such resources shall be evaluated for their eligibility for listing in the National Register of Historic Places. If potentially significant resources are encountered, a letter of notification shall be provided in a timely manner to the Department of City Planning, in addition to the report (described below) that is filed at the completion of grading. If eligible, an archaeological treatment plan shall be developed and implemented in accordance with the Programmatic Agreement.
- Following completion of grading activities, a qualified archaeologist who meets the Secretary of Interior Guidelines and is listed in the Register of Professional Archaeologists shall prepare a report of the results of archaeological investigations to the City of Los Angeles Department of City Planning, other appropriate public agencies, and concurring parties as specified in the Programmatic Agreement. The report shall be submitted to the above parties according to the schedules established in the respective ATPs.
- If a commemorative display center for items of cultural significance should be provided in the Playa Vista First Phase Project, representative artifacts from the Proposed Project site, should they be discovered, or accurate replicas shall be made available for the display at the display center.

### **c. Unavoidable Adverse Impacts**

The impact analysis identified several potential direct and indirect adverse impacts on archaeological or historical resources associated with excavation and incidental unauthorized collecting. These impacts would be similar under both the Proposed Project and the Equivalency Program. Encountered resources would be evaluated and treated per the protocols established the Programmatic Agreement and related Archaeological Research Design. Such evaluation and treatment would allow for scientific discovery and contributions to the body of knowledge regarding California and/or American prehistory and history. The evaluation and treatment undertaken pursuant to these requirements would preclude, through approved and required mitigation techniques, significant impacts from the disturbance, damage, or degradation of

unique archaeological resources or archaeological historic resources that may be encountered. With the implementation of the Programmatic Agreement and mitigation measures, impacts for the Proposed Project and Equivalency Program would be reduced to a less-than-significant level. No adverse impacts on archaeological resources are expected from the construction of the Project's off-site improvements.

#### **d. Cumulative Impacts**

Development of the Proposed Project, inclusive of the Equivalency Program and the construction of the off-site improvements, in combination with the related projects, could contribute to the cumulative loss of cultural (archaeological and historical) resources within the region, city, and state as a whole. All potential sites are required to be evaluated prior to construction activities. Depending on the outcome of these evaluations, there could be possible effects on cultural (archaeological and historical) resources.

One of related projects in the vicinity of the Proposed Project, the Catellus project on the West Bluffs, is developing an area where several archaeological sites are located. These sites have been known since the 1930s, and previous data recovery has mitigated the loss of information associated with these two sites. Recent monitoring during grading activities has uncovered a variety of cultural resources, including human remains, which are being dealt with in accordance with the mitigation measures adopted for that project and applicable federal and state regulations.

At the same time, construction activity conducted under regulations often provides a vehicle for preservation of historic structures and discovery of new archaeological resources that would otherwise remain unknown. To the extent individual related projects would be required to comply with applicable laws, the potential disturbance, damage, or degradation of unique archaeological resources or archaeological historic resources could be mitigated. The cumulative total of all related project development creates the potential for additional impacts upon archaeological resources. Although each project must develop adequate mitigation measures to substantially lessen or avoid impacts on an individual basis, the incidental loss of all project-study area archaeological resources may constitute a significant cumulative impact.

## **28. HISTORICAL RESOURCES**

### **a. Environmental Impacts**

Historic resources in proximity to the Project site consist of the Hughes Industrial Historic District (District), located east of the Project site, within the adjacent Playa Vista First Phase Project site. The existing on-site structures, while a part of the Hughes Aircraft Company complex, are all located outside of the identified Hughes Industrial Historic District and an

adjacent transition zone and, as such, are considered to be non-contributors to the District. All on-site structures were evaluated and determined to not meet the regulatory standards for classification as a historic resource. As such, the Proposed Project would not demolish, destroy, relocate, or alter a historical resource such that the significance of a historical resource would be materially impaired. Furthermore, Project development would have no effects regarding the implementation of the Historic Resource Treatment Plan for the Hughes Industrial Historic District, nor its criteria to maintain the integrity of the District. Therefore, the Proposed Project would not reduce the integrity or significance of important resources on the site or in the vicinity. As such, Project impacts are less than significant.

#### **b. Recommended Mitigation Measures**

The Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would have no impacts on historic resources. Therefore, no mitigation measures are recommended or required for the Proposed Project, inclusive of the Equivalency Program and off-site improvements.

#### **c. Unavoidable Adverse Impacts**

The Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would have no impacts on any historic resources.

#### **d. Cumulative Impacts**

As the Proposed Project, inclusive of the Equivalency Program and the proposed off-site improvements, would have no impact on historic resources, there would also be no contribution to cumulative impacts on historic resources. Except as noted below, the related projects are somewhat distantly located from the Proposed Project, inclusive of the Equivalency Program, and, for the purposes of resulting in a cumulative historic resources impact, do not bear a close physical relationship to it or the proposed off-site improvements. Further, based on available information, none of these related projects are known to contain historic resources. To the extent that historic resources within these related projects are identified at a later date, adverse impacts may occur. However, it is anticipated that should this occur, any activities that did occur involving these related projects would be subject to review under CEQA and would be mitigated to avoid or limit potential impacts. In addition, the Proposed Project, inclusive of the Equivalency Program, and the proposed off-site improvements are located sufficiently far from the Hughes Industrial Historic District to avoid impacts on the integrity of the District. The Proposed Project, inclusive of the Equivalency Program, and the proposed off-site improvements would not contribute incrementally to the demolition, destruction, relocation, or alteration of any historical resources nor the reduction in the integrity of important resources. Therefore, cumulative impacts on historical resources would be less than significant.



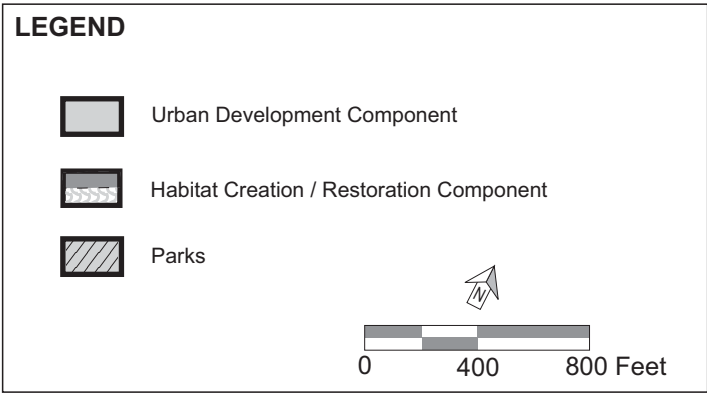
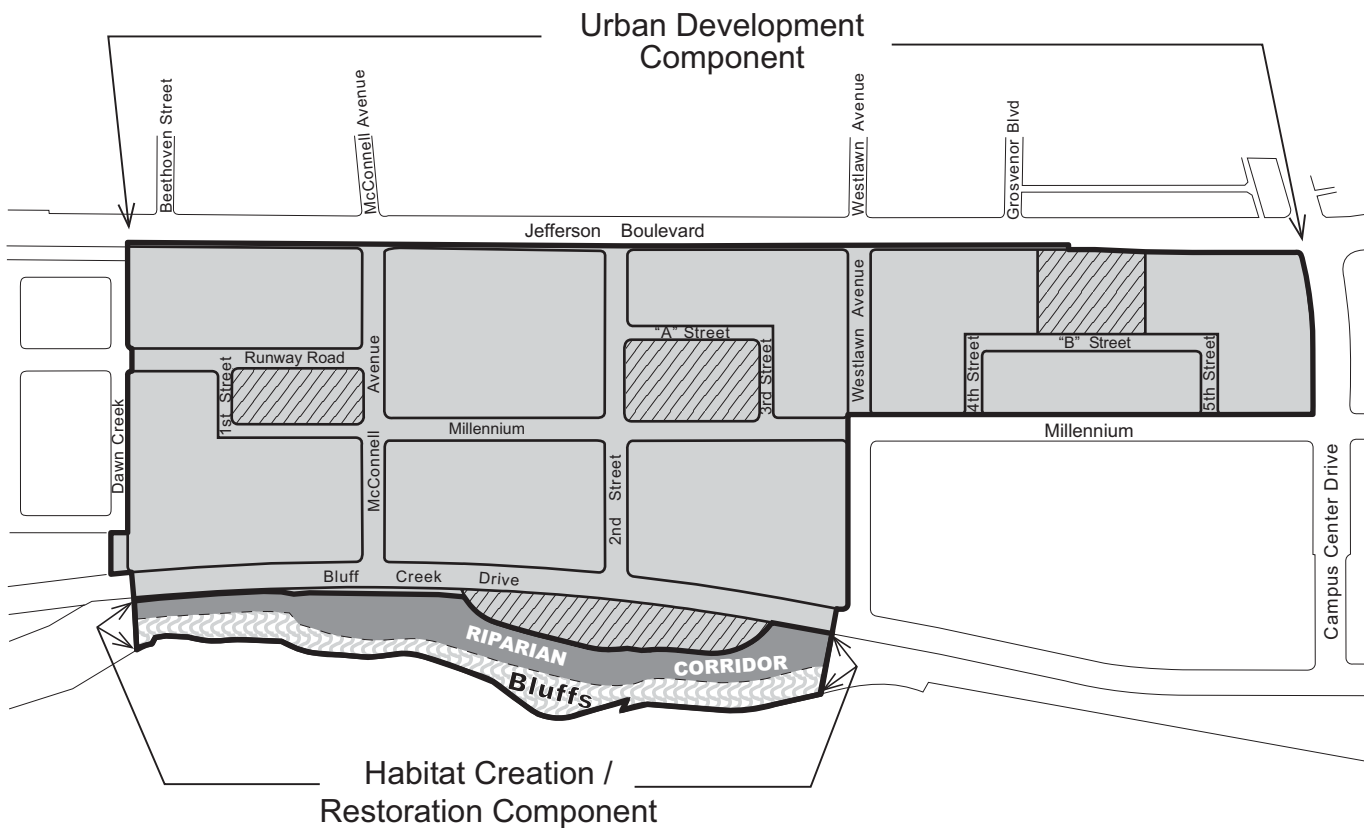
---

## II. CORRECTIONS AND ADDITIONS

### 1. PROJECT DESCRIPTION

---

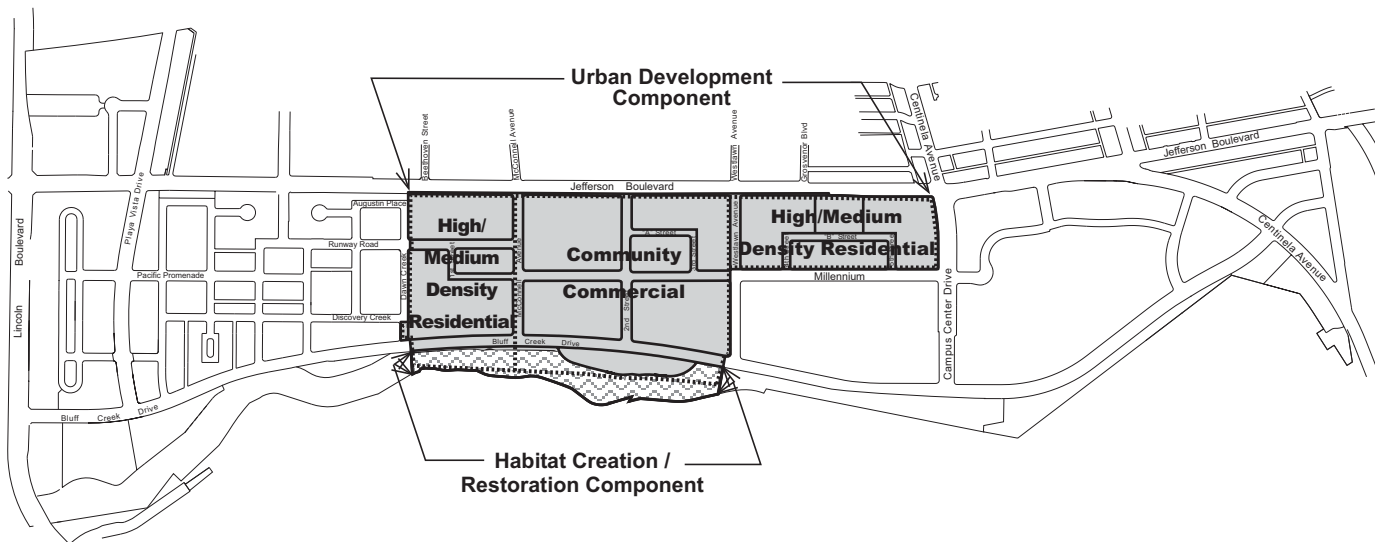
- 1.a** Volume I, Book 1, Section II.B, Project Characteristics, Figure 4, page 155. Replace the figure with the revised Figure 4 as shown on page 167.
- 1.b** Volume I, Book 1, Section II.B, Project Characteristics, Figure 5, page 158. Replace the figure with the revised Figure 5 as shown on page 168.
- 1.c** Volume I, Book 1, Section II.B, Project Characteristics, page 160, second paragraph, second and third bullets. Replace second and third bullets with the following:
- Commercial and Mixed-Use Lots: The maximum lot coverage would be 70%; and
  - Park Sites: The maximum lot coverage would be 15% (for recreational and park support structures).
- 1.d** Volume I, Book 1, Section II.B, Project Characteristics, Figure 6, page 161. Replace the figure with the revised Figure 6 as shown on page 169.
- 1.e** Volume I, Book 1, Section II.B, Project Characteristics, Table 3, page 163. Replace the table with the revised Table 3 as shown on page 170.
- 1.f** Volume I, Book 1, Section II.B, Project Characteristics, page 165, first paragraph, third sentence. Replace with the following:
- “The bicycle lanes would be located along Bluff Creek Drive and Runway Road, and portions of McConnell Avenue, 2nd Street and Millennium.”
- 1.g** Volume I, Book 1, Section II.D, History and Evolution of the Proposed Project, page 179. Replace the third paragraph with the following:
- “In 1997, the Applicant acquired the Playa Vista Project and continued to explore options for further Playa Vista development. On December 19, 2003, the California Wildlife Conservation Board acquired all of Area A and portions of Area B for long-term open space/recreation uses. Also, the Applicant, while retaining rights to complete certain roadway improvements in Area C, is no longer under any obligation to plan and entitle Area C for the benefit of the State of California. As a consequence, Area C has been excluded from the Playa Vista Planning Area.”



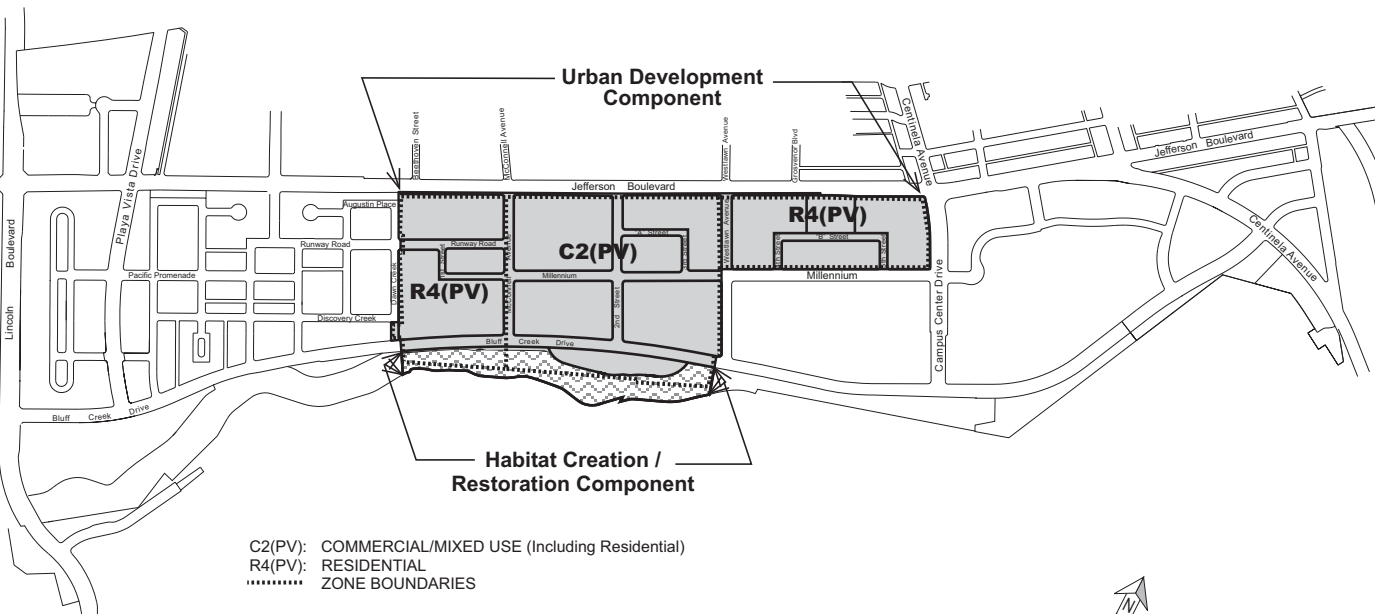
Revised Draft EIR Figure 4,  
**Proposed Project Components**

Source: PCR Services Corporation, March 2004

## Proposed General Plan Designations



## Proposed Specific Plan/Zoning Designations

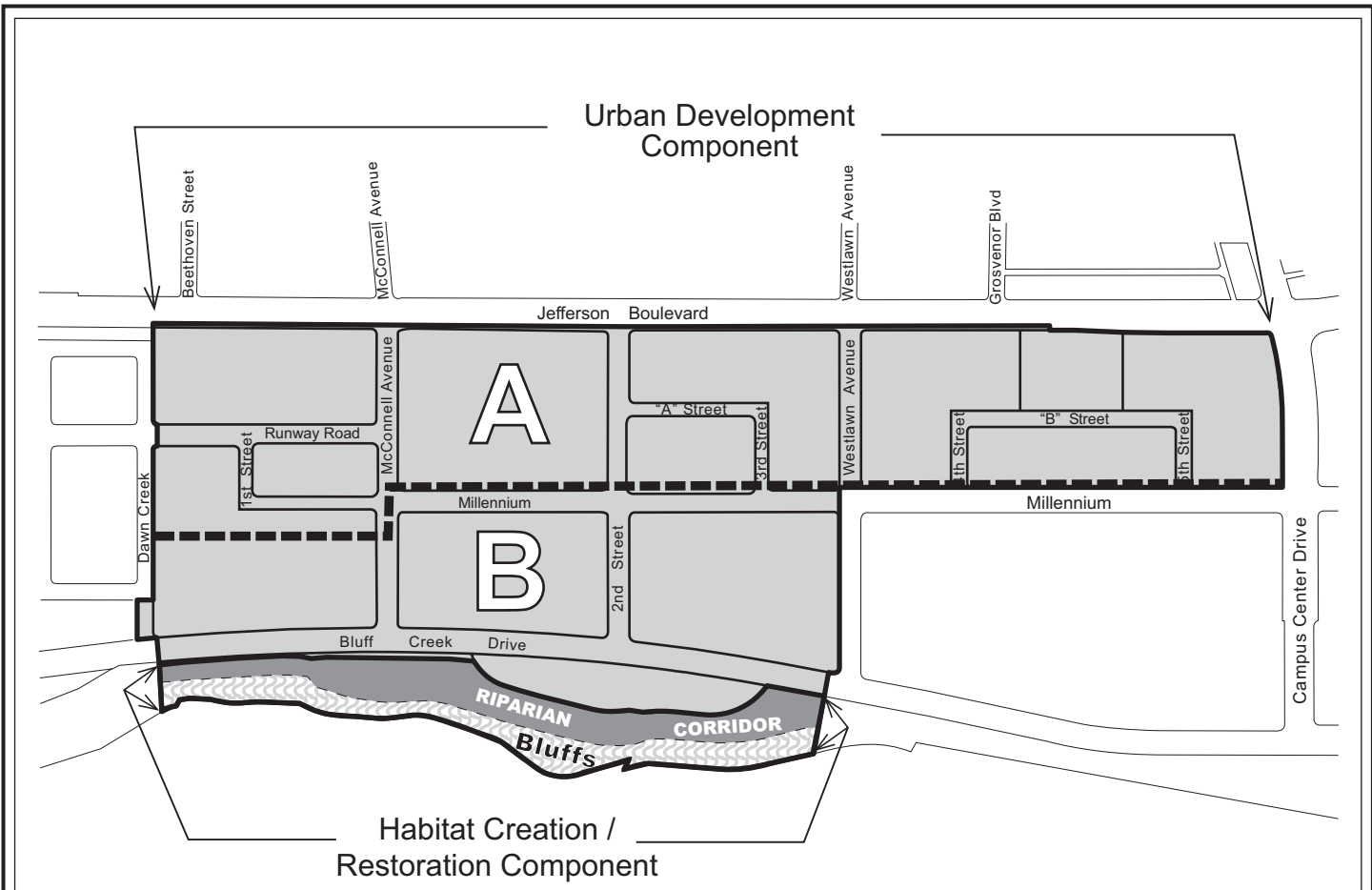


**NOTE:**  
 Locations of roadways and land use boundaries are approximate.  
 Precise placement will be determined as part of subdivision process.



Revised Draft EIR Figure 5,  
**Proposed Plan Amendments**



Source: Playa Capital Company, March 2004





**LEGEND**

Height District	Above Mean Sea Level (AMSL)	Above Finished Grade <sup>a</sup>	Above Existing Grade <sup>a</sup>
A	95'	68' - 72'	71' - 88'
B	112'	85'-89'	88'-105'

<sup>a</sup> Height above finished grade and above existing grade are approximate. Finished grades will be approximately 23' to 27' AMSL. Existing grades vary from approximately 7' to 24' AMSL. Westchester Bluffs: Approximately 140' AMSL

 Urban Development Component  
 Habitat Creation / Restoration Component

  
  
 0      400      800 Feet

Revised Draft EIR Figure 6,  
Proposed Height Limits



Source: PCR Services Corporation, March 2004

**Table 3**

**REVISED DRAFT EIR TABLE 3, PROPOSED SETBACK REQUIREMENTS**

<u>Location</u>	<u>Required Setback</u>	
<u>Thoroughfares</u>		
Jefferson Boulevard	15 Feet	(From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet	
Runway Road (Dawn Creek to McConnell)	15 Feet	(Residential Development will characterize this block.)
Millennium Road between 1st Street and McConnell	10 Feet	
Millennium Road (McConnell to 2nd Street)	0-5 Feet	(Street front retail/live-work residential will characterize this block.)
Millennium Road (Between 2nd Street and Campus Center Drive)	15 Feet	
McConnell Avenue	10 Feet	
McConnell Avenue (400 feet north of Millennium along the east side of the block)	0-5 Feet	(Street front retail will characterize this block.)
Westlawn Avenue	10 Feet	
Campus Center Drive	15 Feet	
1st, 2nd, 3rd, 4th, and 5th Street	10 Feet	
2nd Street (400 feet north of Millennium along the west side of the block)	0-5 Feet	(Street front retail will characterize this block.)
A and B Streets	10 Feet	
Dawn Creek	10 Feet	
<u>Setbacks from Adjacent Lots</u> <sup>a</sup>		
Adjacent to a Residential or Commercial Lot	10 Feet	
Adjacent to a Park or Open Space Lot	5 Feet	

<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

Source: Playa Capital Company, 2004.

---

**II. CORRECTIONS AND ADDITIONS**  
**2. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING**

---

There are no corrections or additions to this section of the Draft EIR.

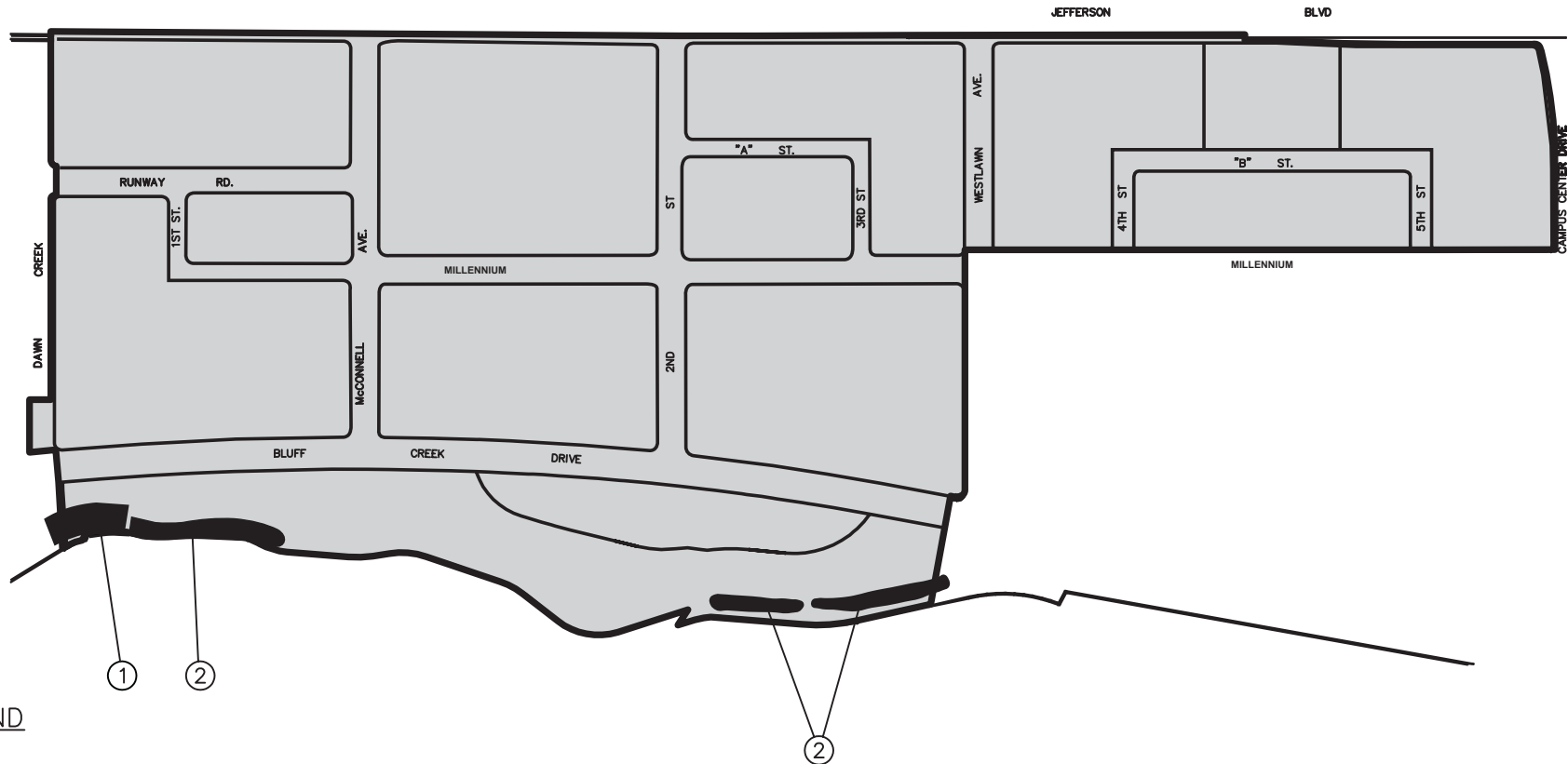
---

## II. CORRECTIONS AND ADDITIONS

### 3. EARTH

---

- 3.a** Volume I, Book 1, Section IV.A, Earth, on page 226. Replace the word “northwest” in the first sentence in the first full paragraph with the word “northeast.”
- 3.b** Volume I, Book 1, Section IV.A, Earth, on page 234. Replace the first sentence of the first paragraph with the following: “A bluff stability investigation was undertaken by Law/Crandall and Associates in 1991, and a supplemental investigation was completed by Group Delta Consultants (GDC) in 2002 (described below on page 235).
- 3.c** Volume I, Book 1, Section IV.A, Earth, Subsection 2.2.2.3, Slope Stability, page 235. Replace the first sentence of the first paragraph with the following:
- “As indicated above, an additional geotechnical investigation regarding slope stability on the Ballona Escarpment, as it relates to potential impacts to the NOS, including areas adjacent to the Proposed Project site, was completed by GDC in December 2001 and revised in January 2002, the conclusions of which were accepted, with conditions, by the City of Los Angeles, Department of Public Works, Bureau of Engineering, Geotechnical Engineering Division, on February 19, 2002.”
- 3.d** Volume I, Book 1, Section IV.A, Earth, Figure 20, page 236. Replace the figure with the revised Figure 20 as shown on page 173.
- 3.e** Volume I, Book 1, Section IV.A, Earth, Subsection 2.2.2.3, Slope Stability, page 237. After the heading *Type 2: Partial Slope Height Fill*, replace with the following:
- “A portion of the slope height would be cut back into dense native soil and filled with material having a minimum cohesion of 200 psf and effective angle of internal friction of 30°, in lifts of 8-inches or less in thickness. The slope grade would match the surrounding grade of 1.5:1 (H:V) or flatter.”
- 3.f** Volume I, Book 1, Section IV.A, Earth, Figure 22, page 248. Replace the figure with the revised Figure 22 as shown on page 174.
- 3.g** Volume I, Book 1, Section IV.A, Earth, Subsection 4.0, Mitigation Measures, page 266. Replace the first sentence of the first bullet under Slope Stability with the following:



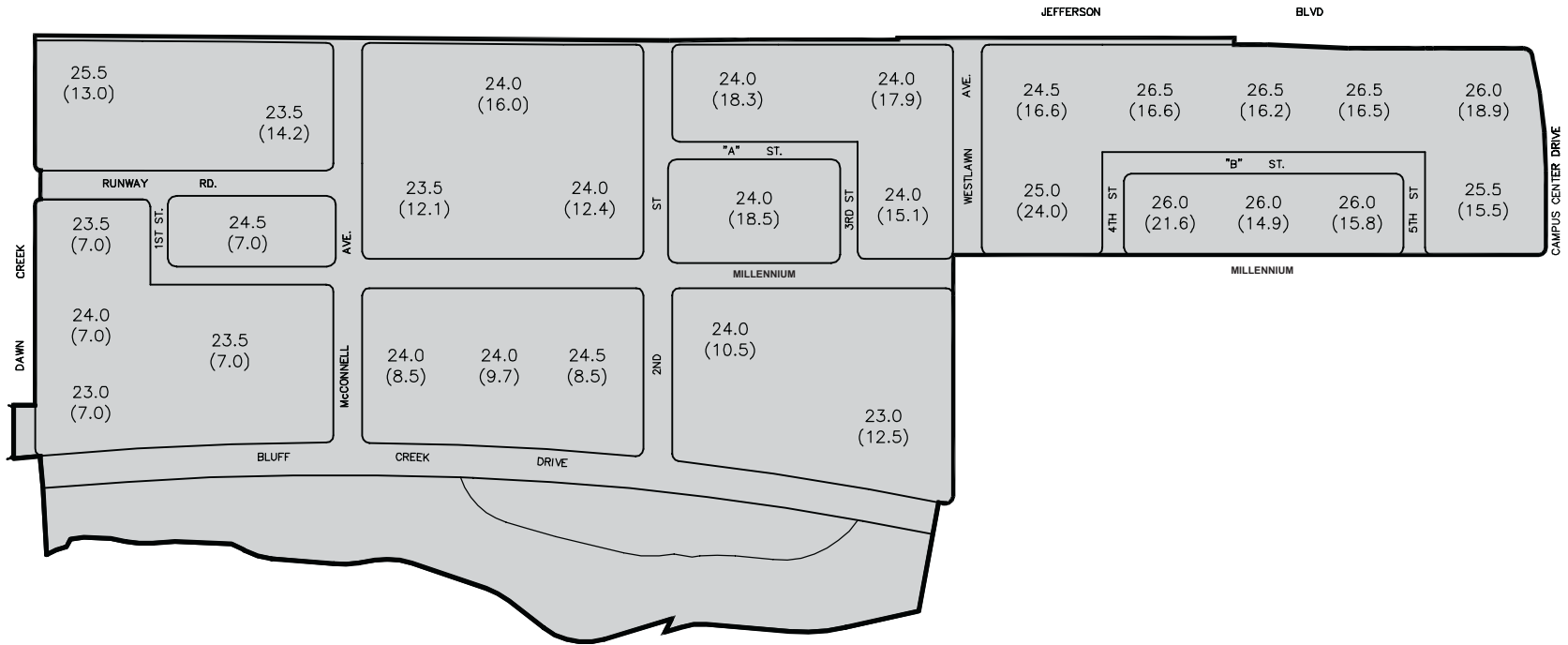
**LEGEND**

- PROJECT BOUNDARY
- AREAS OF POTENTIAL SLOPE STABILITY PROBLEMS.
- ① SLOPE REMEDIATION = REPAIR/FILL ENTIRE SLOPE.
- ② SLOPE REMEDIATION = REPAIR/FILL A PORTION OF SLOPE.

NOTE: BASE MAP AS SHOWN HEREON WAS PREPARED BY PSOMAS. SLOPE STABILITY INFORMATION SHOWN HEREON WAS DERIVED FROM GROUP DELTA CONSULTANTS SLOPE STABILITY INVESTIGATION OF 2001-2002.

Revised Draft EIR Figure 20,  
**Areas of Potential Slope Stability Problems  
 at the Proposed Project Site**

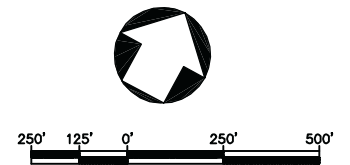




**LEGEND**

- 24.0 – PROPOSED ELEVATION (IN FEET AMSL)
- (7.0) – EXISTING ELEVATION (IN FEET AMSL)

NOTE: BASE MAP AS SHOWN HEREON WAS PREPARED BY PSOMAS. ALL OTHER INFORMATION SHOWN HEREON WAS SUPPLIED BY PLAYA CAPITAL COMPANY.



Revised Draft EIR Figure 22,  
Existing and Proposed Ground Elevations

“Prior to completion of the Riparian Corridor, slope stability remedial measures shall be implemented as appropriate for the areas of potential instability below Cabora Road in accordance with the Group Delta Consultants (GDC) bluff stabilization final assessment report dated December 3, 2001 (revised January 31, 2002), and approved by the City of Los Angeles Department of Public Works on February 19, 2002.”

- 3.h** Volume I, Book 1, Section IV.A, Earth, Subsection 4.0, Mitigation Measures, page 267. After the heading Type 2: Partial Slope Height Fill, replace with the following:

“A portion of the slope height would be cut back into dense native soil and filled with material having a minimum cohesion of 200 psf and effective angle of internal friction of 30°, in lifts of 8-inches or less in thickness. The slope grade would match the surrounding grade of 1.5:1 (H:V) or flatter.”

- 3.i** Volume 1, Book 1, Section IV.A, Earth, under Subsection 4.0, Mitigation Measures, on page 267, replace the first bullet under “Other” with the following bullet:

- All dewatering shall be conducted in accordance with the requirements of permits obtained from the appropriate permitting agency(ies) (i.e., NPDES permits obtained from the Regional Water Quality Control Board and/or Industrial Waste Discharge Permits obtained from the City of Los Angeles Department of Public Works). Prior to initiating any dewatering activities that are not included within the scope of permit provisions, the Applicant/Contractor must update the plans and provisions related to the permit and must notify the Regional Water Quality Control Board and/or City Department of Public Works, as applicable, of any such plan/provision modifications.

- 3.j** Volume I, Book 1, Section IV.A, Earth, Subsection 4.0, Mitigation Measures, page 267. Replace the first sentence of last bullet on the page with the following:

“Prior to the issuance of grading permits or “B” permits for initial site preparation, a pest control firm shall be retained to conduct and implement a rodent control program to prevent the migration of rodents or pest to neighboring properties.”

---

## II. CORRECTIONS AND ADDITIONS

### 4. AIR QUALITY

---

- 4.a** Volume I, Book 1, Section IV.B, Air Quality, page 331. Add the following new Subsection at the bottom of the page:

**“3.5 2010 Baseline, No Playa Vista Drive and Bridge, and New Mitigation Measures**

Subsection 3.0, above, analyzes air emissions during Project construction and operations. The only air quality analysis that is potentially modified by implementation of the 2010 Baseline Scenario (no Playa Vista Drive bridge and road) and the new traffic mitigation measure identified in the Final EIR is the analysis of localized carbon monoxide (CO) during Project operations. Traffic volumes under this scenario were analyzed and those locations where traffic volumes changed were re-analyzed to quantitatively determine the potential change in CO levels at those locations analyzed in Subsection 3.0. The additional analysis is included as an Appendix to the Final EIR. It is concluded, based on the results of this analysis, development under this Baseline Scenario would result in a less than significant air quality impact, the same conclusion reached with regard to the Baseline Scenario with the Playa Vista Drive bridge and road in Subsection 3.4.2.3, above.”

- 4.b** Volume I, Book 1, Section IV.B, Air Quality, page 334, second bullet. Replace with the following:

“Low Emission Equipment and Technologies: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.”

- 4.c** Volume I, Book 1, Section IV.B, Air Quality, page 335, sixth bullet. Replace with the following:

“All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible, or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Sections 23114.”

- 4.d** Volume I, Book 1, Section IV.B, Air Quality, page 336, first bullet under subheading (iv) Building Materials and Architectural Coatings. Add the following after the first sentence:

“Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.”

- 4.e** Volume I, Book 1, Section IV.B, Air Quality, page 337, first bullet under subheading (iii), Building Materials and Architectural Coatings. Add the following after the first sentence:

“Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.”

- 4.f** Volume I, Book 1, Section IV.B, Air Quality, page 339, second bullet under subheading Construction Equipment/Operation. Replace with the following:

“Low Emission Equipment and Technologies: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.”

- 4.g** Volume 1, Book 1, Section IV.B, Air Quality, page 340. Replace the first dashed item at the top of the page with the following:

“All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible, or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Sections 23114.”

- 4.h** Volume I, Book 1, Section IV. B, Air Quality, page 340, first bullet under subheading Building Materials and Architectural Coatings. Add the following after the first sentence:

“Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.”

---

## II. CORRECTIONS AND ADDITIONS

### 5. HYDROLOGY

---

**5.a** Volume I, Book 1, Section IV.C.(1), Subsection 4.0, Mitigation Measures, page 395.  
Replace the first bullet on the page with the following:

- “Prior to recordation of the first final map, a covenant and agreement shall be prepared and recorded satisfactory to the Department of Public Works, Bureau of Sanitation, Stormwater Management Division and the City Attorney, as appropriate, which shall include the following:”

---

## II. CORRECTIONS AND ADDITIONS

### 6. WATER QUALITY

---

- 6.a** Volume I, Book 1, Section IV.C.(2), Water Quality, Subsection 3.4.1.2.5, Ballona Channel, page 479, Table 44. Replace the table with Table 44 as shown on page 180 to correct typographical errors.
- 6.b** Volume I, Book 1, Section IV.C.(2), Water Quality, Subsection 3.4.1.2.5, Ballona Channel, page 483, Table 47. Replace the table with Table 47 as shown on page 181 to correct typographical errors.
- 6.c** Volume I, Book 1, Section IV.C.(2), Water Quality, Subsection 3.4.1.2.6, Ballona Wetlands, page 486, Table 48. Replace the table with Table 48 as shown on page 182 to correct typographical errors.
- 6.d** Volume I, Book 1, Section IV.C.(2), Water Quality, Subsection 3.4.1.2.7, Freshwater Wetlands System, page 494, Table 55. Replace the table with Table 55 as shown on page 183 to correct typographical errors.
- 6.e** Volume I, Book 1, Section IV.C.(2), Water Quality, Subsection 3.4.1.2.7, Freshwater Wetlands System, page 495, Table 56. Replace the table with Table 56 as shown on page 184 to correct typographical errors.
- 6.f** Volume I, Book 1, Section IV.C.(2), Water Quality, Subsection 4.0, Mitigation Measures, page 495. Replace the bullet at top of the page with the following:
- The Proposed Project shall incorporate the following features to reduce pollutant loadings, to the extent permissible by applicable codes.

**Table 44**

**REVISED DRAFT EIR TABLE 44, REPRESENTATIVE STORMWATER LOADS AND CONCENTRATIONS TO THE BALLONA CHANNEL FROM THE FRESHWATER MARSH AND BALLONA WETLANDS**

	Predicted Average Loads <sup>a</sup>										Volume (10 <sup>3</sup> ft <sup>3</sup> /year)
	(lbs/yr)				(lbs/yr)						
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn	
Pre-First Phase <sup>b</sup>	67,887	395	2,321	2,592	25.5	10.6	15.4	7.0	63.3	26.1	27,497
With Playa Vista First Phase Project	36,920	287	1,885	1,794	14.4	9.6	8.8	4.9	49.3	18.8	31,447
With Proposed Project <sup>c</sup>	38,413	302	1,977	1,893	15.1	10.1	9.3	5.2	51.8	19.7	33,211
Percent Change from Pre-First Phase to Proposed Project	-43%	-24%	-15%	-27%	-41%	-4%	-40%	-26%	-18%	-25%	+21%
	Predicted Average Concentrations <sup>a</sup>										Volume (10 <sup>3</sup> ft <sup>3</sup> /year)
	(mg/L)				(mg/L)						
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn	
Pre-First Phase <sup>b</sup>	39.5	0.23	1.4	1.5	14.8	6.5	9.0	4.1	36.9	15.2	27,497
With Playa Vista First Phase Project	18.8	0.15	1.0	0.9	7.3	4.9	4.5	2.5	25.1	9.6	31,447
With Proposed Project <sup>c</sup>	18.5	0.15	1.0	0.9	7.3	4.9	4.5	2.5	25.0	9.5	33,211
Percent Change from Pre-First Phase to Proposed Project	-53%	-37%	-29%	-40%	-51%	-21%	-50%	-39%	-32%	-38%	+21%

*lbs/yr = pounds per year*

*mg/L = micrograms per liter*

*TKN = Total Kjeldahl Nitrogen*

*DCu = Dissolved Copper*

*TZn = Total Zinc*

*10<sup>3</sup> ft<sup>3</sup>/yr = one thousand cubic feet per year*

*TSS = Total Suspended Solids*

*O&G = Oil and Grease*

*TPb = Total Lead*

*DZn = Dissolved Zinc*

*mg/L = milligrams per liter*

*TP = Total Phosphorus*

*TCu = Total Copper*

*DPb = Dissolved Lead*

<sup>a</sup> Subtotals and totals were calculated prior to rounding.

<sup>b</sup> Total pollutant loads for pre-First Phase conditions are included in table, to provide a basis for comparison of project impacts. Breakdown of existing pollutant loading for each area is provided in Volume I, Section 3, of the Water Resources Technical Report (Appendix F-1).

<sup>c</sup> Proposed Project at buildout which would also include the adjacent Playa Vista First Phase Project.

Source: Camp Dresser and McKee Inc. and GeoSyntec Consultants.

**Table 47**

**REVISED DRAFT EIR TABLE 47, REPRESENTATIVE STORMWATER CONCENTRATIONS TO THE BALLONA CHANNEL FROM THE FRESHWATER MARSH COMPARED TO WATER QUALITY BENCHMARKS \***

<b>Parameter</b>	<b>Water Quality Benchmark</b>	<b>Predicted Concentration</b>
Total Phosphorus (TP), (mg/L) <sup>a</sup>	0.20	0.13
Total Kjeldahl Nitrogen (TKN), (mg/L) <sup>a</sup>	1.5	0.84
Total Suspended Solids (TSS), (mg/L) <sup>b</sup>	60	11.3
Oil and Grease (O&G), (mg/L) <sup>b</sup>	25	0.9

*mg/L = milligrams per liter*

\* *The Water Quality benchmarks apply to receiving waters – not directly to discharges to those receiving waters. Thus the water quality benchmarks are not directly applicable to the Channel. A comparison of the water quality benchmarks is conservative because it does not account for assimilation that may occur once the influent actually enters the receiving waters.*

<sup>a</sup> *U.S. EPA, 2000. Ambient Water Quality Criteria Recommendations: Information Supporting the Development of State and Tribal Nutrient Criteria for Rivers and Streams in Nutrient Ecoregion III. EPA 822-B-00-016.*

<sup>b</sup> *SWRCB, 2001. California Ocean Plan: Water Quality Control Plan Ocean Waters of California.*

*Source: GeoSyntec Consultants*



Table 48

**REVISED DRAFT EIR TABLE 48, REPRESENTATIVE STORMWATER LOADS AND CONCENTRATIONS TO THE BALLONA WETLANDS FROM THE FRESHWATER MARSH\***

	Predicted Average Loads <sup>a</sup>										Volume (10 <sup>3</sup> ft <sup>3</sup> /year)
	(lbs/yr)				(lbs/yr)						
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn	
Pre-First Phase <sup>b</sup>	71,883	241	1,459	1,671	15.9	8.6	9.7	4.4	124.9	44.7	13,329
With Playa Vista First Phase Project	1,417	17	105	113	0.8	0.6	0.6	0.3	2.6	0.9	2,008
With Proposed Project <sup>c</sup>	1,516	18	112	121	0.8	0.6	0.6	0.4	2.8	1.0	2,149
Percent Change from Pre-First Phase to Proposed Project	-98%	-93%	-92%	-93%	-95%	-93%	-94%	-92%	-98%	-98%	-84%
	Predicted Average Concentrations <sup>a</sup>										Volume (10 <sup>3</sup> ft <sup>3</sup> /year)
	(mg/L)				(mg/L)						
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn	
Pre-First Phase <sup>b</sup>	86.4	0.29	1.75	2.01	19.1	10.3	11.6	5.3	150.1	53.7	13,329
With Playa Vista First Phase Project	11.3	0.13	0.84	0.90	6.0	4.7	4.6	2.7	20.9	7.5	2,008
With Proposed Project <sup>c</sup>	11.3	0.13	0.84	0.90	6.0	4.7	4.6	2.7	20.9	7.5	2,149
Percent Change from Pre-First Phase to Proposed Project	-87%	-54%	-52%	-55%	-69%	-55%	-60%	-50%	-87%	-86%	-84%

lbs/yr = pounds per year

mg/L = micrograms per liter

TKN = Total Kjeldahl Nitrogen

DCu = Dissolved Copper

TZn = Total Zinc

10<sup>3</sup> ft<sup>3</sup>/yr = one thousand cubic feet per year

TSS = Total Suspended Solids

O&G = Oil and Grease

TPb = Total Lead

DZn = Dissolved Zinc

mg/L = milligrams per liter

TP = Total Phosphorus

TCu = Total Copper

DPb = Dissolved Lead

<sup>a</sup> Subtotals and totals were calculated prior to rounding.

<sup>b</sup> Total pollutant loads for pre-First Phase conditions are included in table, to provide a basis for comparison of project impacts. Breakdown of existing pollutant loading for each area is provided in Volume I, Section 3, of the Water Resources Technical Report (Appendix F-1).

<sup>c</sup> Proposed Project at buildout which would also include the adjacent Playa Vista First Phase Project.

Source: Camp Dresser and McKee Inc. and GeoSyntec Consultants

Table 55

**REVISED DRAFT EIR TABLE 55, REPRESENTATIVE STORMWATER LOADS AND CONCENTRATIONS TO THE MAIN BODY OF THE FRESHWATER MARSH NEAR THE PRIMARY MANAGEMENT AREAS**

	Predicted Average Loads <sup>a</sup>										Volume (10 <sup>3</sup> ft <sup>3</sup> /year)
	(lbs/yr)				(lbs/yr)						
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn	
Pre-First Phase (sum of future contributing drainages) <sup>b</sup>	131,283	358	2,253	2,377	25.5	13.1	13.7	6.3	204.2	91.8	20,829
With Playa Vista First Phase Project	49,240	317	2,000	1,939	17.3	11.0	10.6	5.3	134.1	58.8	25,100
With Proposed Project <sup>c</sup>	49,251	338	2,158	2,069	18.2	11.6	11.1	5.6	139.7	61.8	26,863
	Predicted Average Concentrations <sup>a</sup>										Volume (10 <sup>3</sup> ft <sup>3</sup> /year)
	(mg/L)				(mg/L)						
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn	
Pre-First Phase (sum of future contributing drainages) <sup>b</sup>	101.0	0.28	1.73	1.83	19.6	10.1	10.6	4.8	157.0	70.6	20,829
With Playa Vista First Phase Project	31.4	0.20	1.28	1.24	11.0	7.0	6.8	3.4	85.6	37.5	25,100
With Proposed Project <sup>c</sup>	29.4	0.20	1.29	1.23	10.9	6.9	6.6	3.3	83.3	36.9	26,863

lbs/yr = pounds per year

mg/L = micrograms per liter

TKN = Total Kjeldahl Nitrogen

DCu = Dissolved Copper

TZn = Total Zinc

10<sup>3</sup> ft<sup>3</sup>/yr = one thousand cubic feet per year

TSS = Total Suspended Solids

O&G = Oil and Grease

TPb = Total Lead

DZn = Dissolved Zinc

mg/L = milligrams per liter

TP = Total Phosphorus

TCu = Total Copper

DPb = Dissolved Lead

<sup>a</sup> Subtotals and totals were calculated prior to rounding

<sup>b</sup> Total pollutant loads for pre-First Phase conditions are included in table, to provide a basis for comparison of project impacts. Breakdown of existing pollutant loading for each area is provided in Volume I, Section 3 of the Water Resources Technical Report (Appendix F-1). Sum of future contributing drainages includes Jefferson Storm Drain, Centinela Ditch, Lincoln Storm Drain and off-site tributary areas.

<sup>c</sup> Which also includes the adjacent Playa Vista First Phase Project (i.e., Playa Vista Project Buildout).

Source: Camp Dresser and McKee Inc. and GeoSyntec Consultants

**Table 56**

**REVISED DRAFT EIR TABLE 56, REPRESENTATIVE STORMWATER CONCENTRATIONS  
TO THE FRESHWATER WETLANDS SYSTEM  
WITH PLAYA VISTA FIRST PHASE AND PROPOSED PROJECT**

	Predicted Average Concentrations									
	(mg/L)				(mg/L)					
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn
Riparian Corridor at Lincoln <sup>a</sup>	24.9	0.27	1.5	1.3	11.4	9.9	9.6	4.4	137.9	35.2
Central Storm Drain <sup>a</sup>	42.7	0.27	2.1	1.7	15.8	7.3	7.4	3.4	112.1	66.7
Jefferson Storm Drain <sup>a</sup>	87.2	0.29	2.0	2.0	23.9	11.1	10.3	4.7	204.7	121.8
Lincoln Storm Drain – South	42.4	0.26	1.8	1.7	15.5	7.2	4.6	2.1	115.9	69.0
Direct runoff to Freshwater Marsh	88.9	0.05	0.4	0.1	4.1	1.9	1.3	0.6	11.9	7.1
<b>Main Body of the Freshwater Marsh</b>	<b>29.4</b>	<b>0.20</b>	<b>1.3</b>	<b>1.2</b>	<b>10.9</b>	<b>6.9</b>	<b>6.6</b>	<b>3.3</b>	<b>83.3</b>	<b>36.9</b>
<b>Freshwater Marsh Effluent</b>	<b>11.3</b>	<b>0.13</b>	<b>0.8</b>	<b>0.9</b>	<b>6.0</b>	<b>4.7</b>	<b>4.6</b>	<b>2.7</b>	<b>20.9</b>	<b>7.5</b>

WQ = Water Quality

mg/L = milligrams per liter

TP = Total Phosphorus

TCu = Total Copper

DPb = Dissolved Lead

mg/L = micrograms per liter

TKN = Total Kjeldahl Nitrogen

DCu = Dissolved Copper

TZn = Total Zinc

TSS = Total Suspended Solids

O&G = Oil and Grease

TPb = Total Lead

DZn = Dissolved Zinc

<sup>a</sup> These concentrations assume treatment from the on-site treatment controls (catch basin inserts, vegetated swales, and roof-drain planter boxes).

Source: GeoSyntec Consultants

---

## II. CORRECTIONS AND ADDITIONS

### 7. BIOTIC RESOURCES

---

- 7.a** Volume I, Book 2, Section IV.D, Biotic Resources, page 551. Add as first new bullet on the page:

“Plants that might be invasive or that might interbreed with native plants in nearby restoration areas shall be avoided in the parkway landscaping along Bluff Creek Drive.”

- 7.b** Volume I, Book 2, Section IV.D, Biotic Resources, page 551. Replace the first Bluff Restoration mitigation measure with the following measure:

“Concurrent with the construction of the adjacent Riparian Corridor, the bluff area within the Habitat Creation/Restoration Component shall be restored as coastal sage scrub habitat, in accordance with the Bluff Restoration Plan and specific success criteria, maintenance provisions, and monitoring requirements contained in Attachment B of the MMRP.”

- 7.c** Volume I, Book 2, Section IV.D, Biotic Resources, page 551, third and fourth bullets. Replace with the following:

“Landscaping along the south side of Bluff Creek Drive adjacent to the habitat areas shall incorporate non-invasive plant materials that will reduce the potential for intrusion of vehicle headlight glare and buffer traffic noise into the Riparian Corridor.”

---

## II. CORRECTIONS AND ADDITIONS

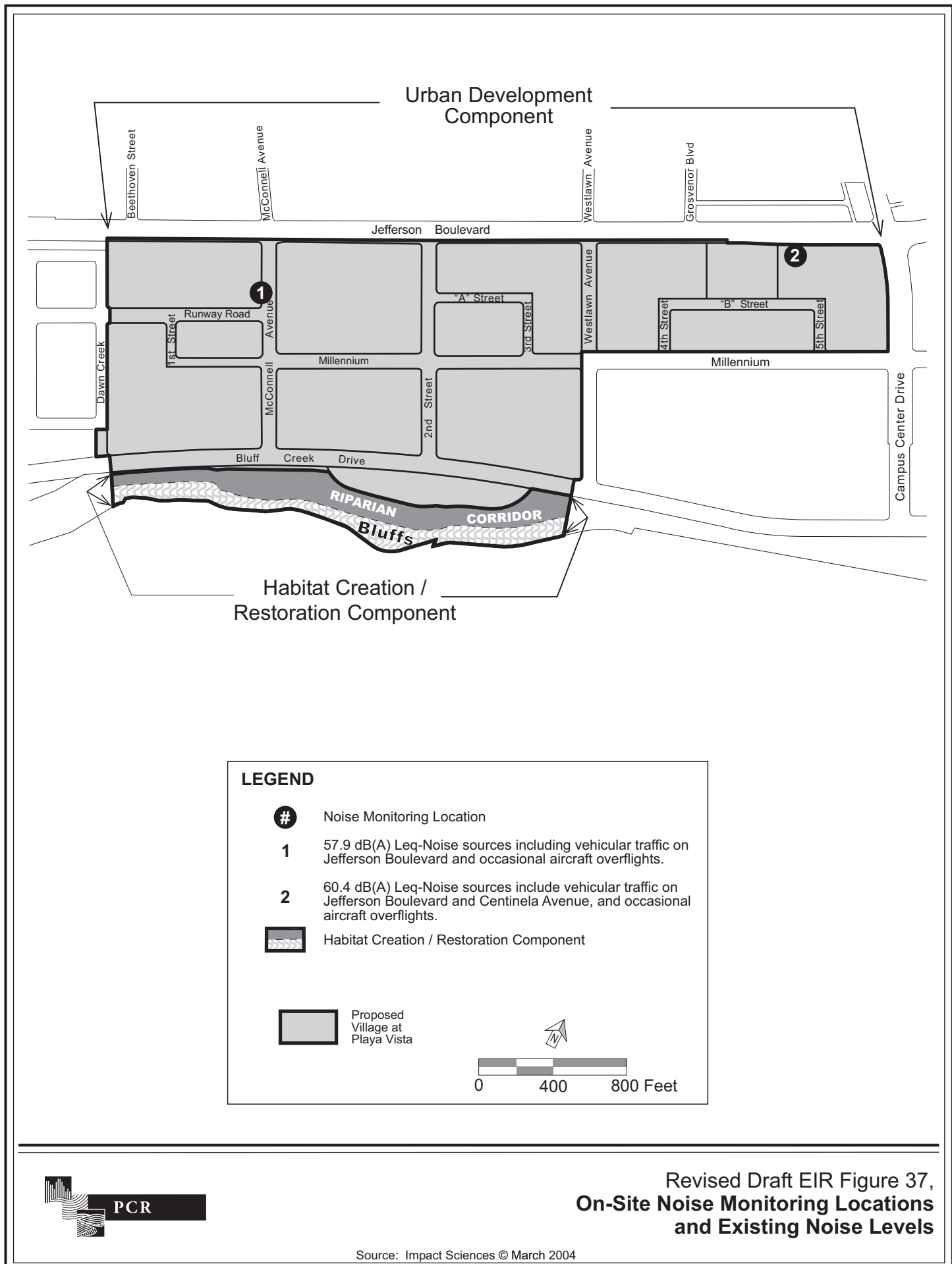
### 8. NOISE

---

- 8.a** Volume I, Book 2, Section IV.E, Noise, Figure 37, page 562. Replace the figure with the revised Figure 37 as shown on page 187.
- 8.b** Volume I, Book 2, Section IV.E, Noise, Table 74, page 569. Replace the table with the revised Table 74 as shown on page 188.
- 8.c** Volume I, Book 2, Section IV.E, Noise, Figure 39, page 574. Replace the figure with the revised Figure 39 as shown on page 189.
- 8.d** Volume I, Book 2, Section IV.E, Noise, Figure 40, page 575. Replace the figure with the revised Figure 40 as shown on page 190.
- 8.e** Volume I, Book 1, Section IV.E, Noise, page 582. Add the following new Subsection at the bottom of the page:

#### **3.5 2010 Baseline, No Playa Vista Drive and Bridge, and New Mitigation Measures**

“Subsection 3.0, above, analyzes potential noise impacts attributable to Project construction and operations air emissions during Project construction and operations. The noise analyses that are potentially modified by implementation of the No Playa Vista Drive bridge and road 2010 Baseline Scenario and the new traffic mitigation measure identified in the Final EIR are as follows: (1) Predicted 2010 With Project Roadway Noise Levels Within The Vicinity Of The Project Site (Table 76); (2) Roadway Traffic Noise Impacts At Representative Noise Sensitive Locations (Table 77); (3) Peak Traffic Hour Roadway Noise Impacts At Public Elementary Schools (Table 78); (4) Composite Noise Impacts At Representative Noise Sensitive Locations (Table 80); (5) Cumulative Operational Noise Impacts At Noise Sensitive Locations With Project: and (6) Cumulative Peak Traffic Hour Roadway Noise Impacts At Public Elementary Schools. Traffic volumes under the alternative 2010 Baseline Scenario were analyzed and those locations where traffic volumes increased, were re-analyzed to quantitatively determine the potential change in noise levels at those locations analyzed in Subsection 3.0. The additional analyses are included as an Appendix to the



**LEGEND**

- Noise Monitoring Location
- 1** 57.9 dB(A) Leq-Noise sources including vehicular traffic on Jefferson Boulevard and occasional aircraft overflights.
- 2** 60.4 dB(A) Leq-Noise sources include vehicular traffic on Jefferson Boulevard and Centinela Avenue, and occasional aircraft overflights.
- Habitat Creation / Restoration Component
- Proposed Village at Playa Vista

0 400 800 Feet



Revised Draft EIR Figure 37,  
**On-Site Noise Monitoring Locations  
 and Existing Noise Levels**

Source: Impact Sciences © March 2004

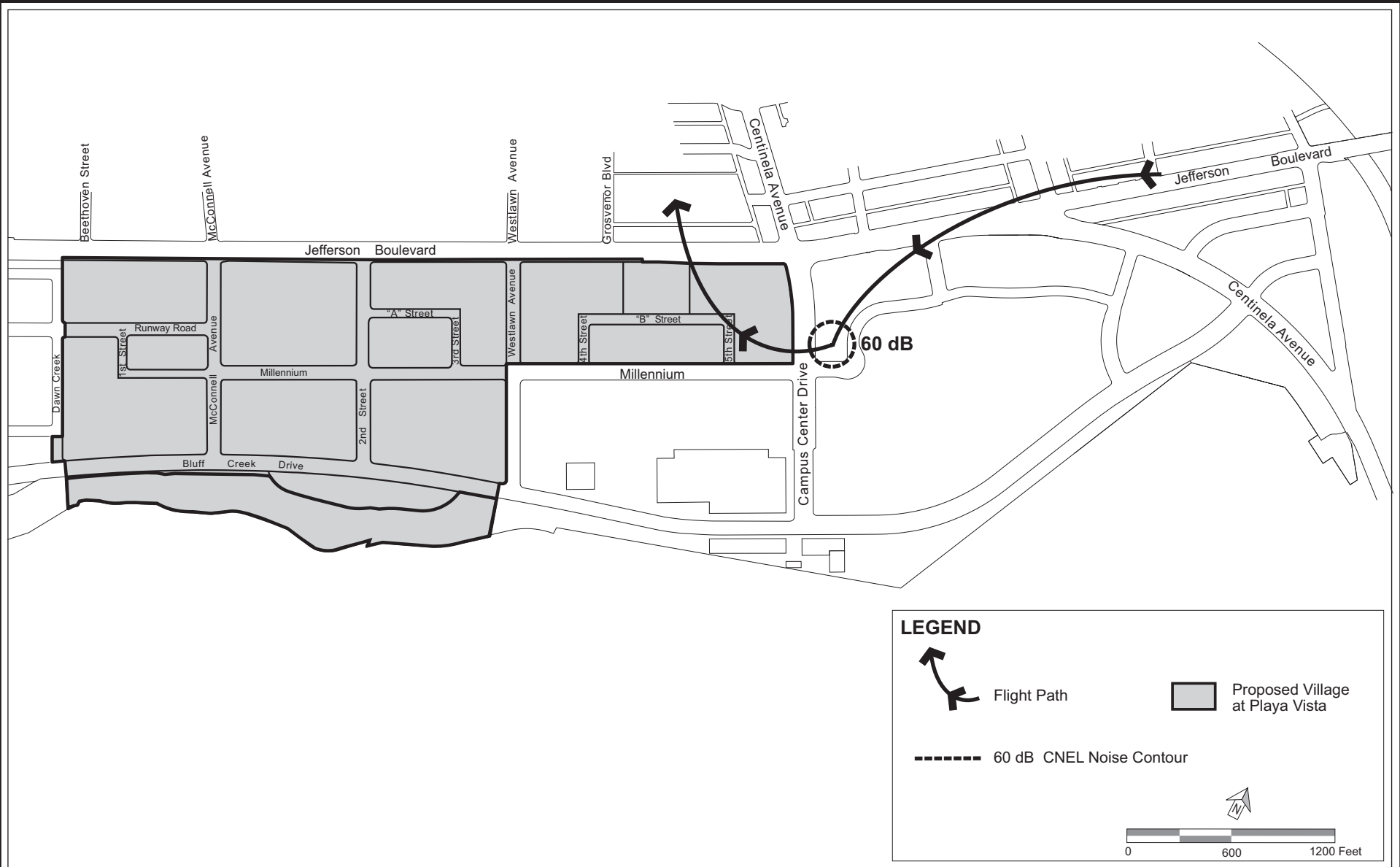
**Table 74**

**REVISED DRAFT EIR TABLE 74, PROPOSED SETBACK REQUIREMENTS**

<b>Location</b>	<b>Required Setback</b>	
<b>Thoroughfares</b>		
Jefferson Boulevard	15 Feet	(From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet	
Runway Road (Dawn Creek to McConnell)	15 Feet	(Residential Development will characterize this block)
Millennium Road between 1st Street and McConnell	10 Feet	
Millennium Road (McConnell to 2nd Street)	0-5 Feet	(Street front retail/live-work residential will characterize this block.)
Millennium Road (Between 2nd Street and Campus Center Drive)	15 Feet	
McConnell Avenue	10 Feet	
McConnell Avenue (400 feet north of Millennium along the east side of the block)	0-5 Feet	(Street front retail will characterize this block.)
Westlawn Avenue	10 Feet	
Campus Center Drive	15 Feet	
1st, 2nd, 3rd, 4th, and 5th Street	10 Feet	
2nd Street (400 feet north of Millennium along the west side of the block)	0-5 Feet	(Street front retail will characterize this block.)
A and B Streets	10 Feet	
Dawn Creek	10 Feet	
<b>Setbacks from Adjacent Lots <sup>a</sup></b>		
Adjacent to a Residential or Commercial Lot	10 Feet	
Adjacent to a Park or Open Space Lot	5 Feet	

<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

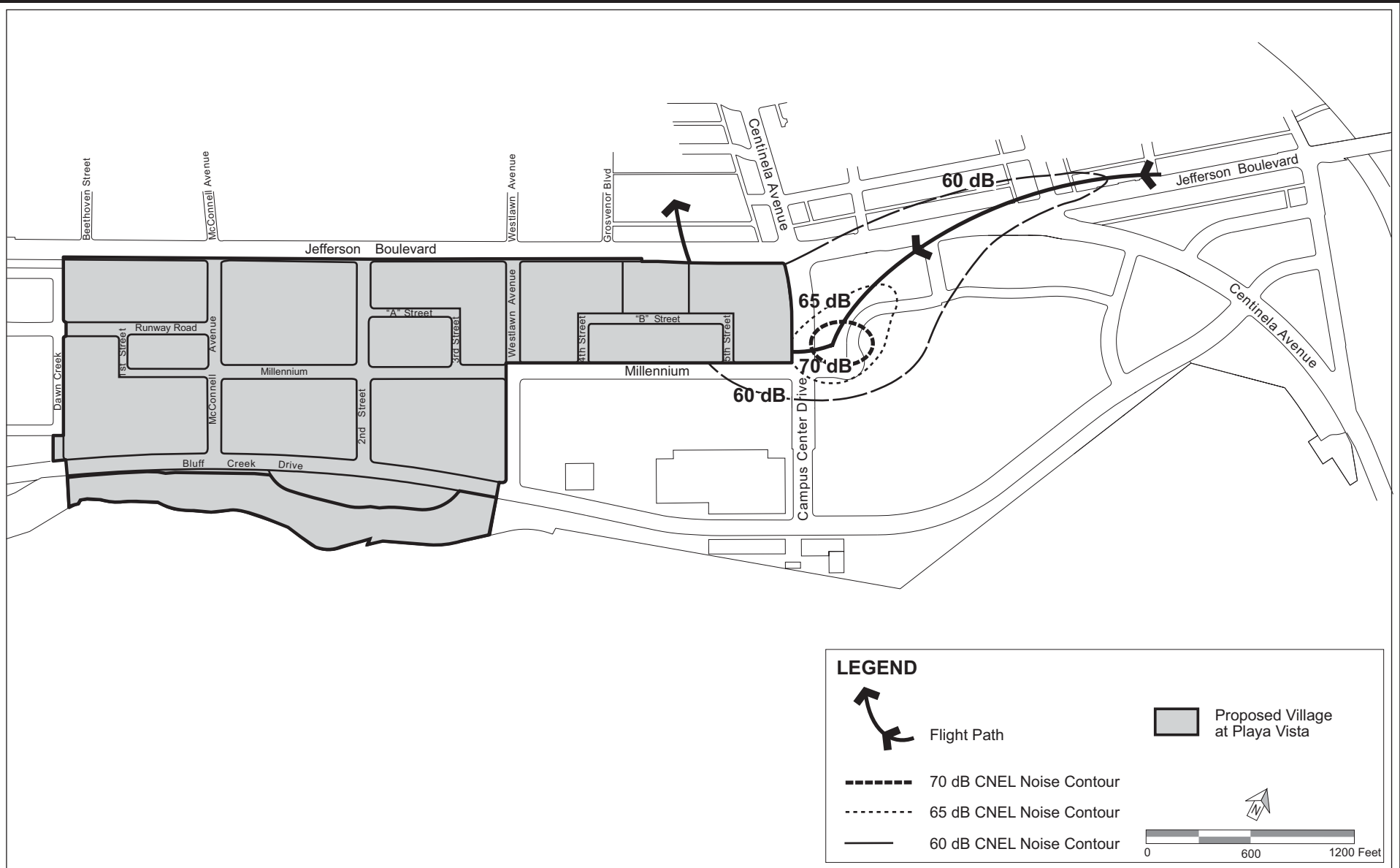
Source: Playa Capital Company, 2004.



Revised Draft EIR Figure 39,  
 Future 2010 Normal Day Helicopter Noise Levels

Source: Impact Sciences © 2004 and Heliport Consultats





Revised Draft EIR Figure 40,  
**Future 2010 Peak Day Helicopter Noise Levels**

Source: Impact Sciences © 2004 and Heliport Consultats

Final EIR. It is concluded, based on the results of this analysis, development under this Baseline Scenario would result in a less than significant noise impact, the same conclusion reached with regard to the Baseline Scenario with the Playa Vista Drive Bridge and road.”

- 8.f** Volume I, Book 2, Section IV.E, Noise, Subsection 4.1, Mitigation Measures, Construction Noise, page 583. Under the heading “Mitigation Measure for the Proposed Project and the Equivalency Program”, add the following mitigation measure:

“Prior to the issuance of the first grading permit, the Applicant shall submit to the City of Los Angeles Planning Department a construction noise management plan relative to Playa del Rey School. The plan shall set forth the process for the notification to the Playa del Rey School of any construction activities which may affect the school, and noise management measures to be undertaken when construction noise levels are projected to be or are greater than 5 dBA over ambient exterior conditions, or by more than 3 dBA in the event the ambient noise level at Playa del Rey School exceeds 67 dBA. Noise management measures may include one or more of the following: temporary sound barriers (e.g., plywood fences, sound blankets, earthen berms), pile driver acoustical shields, residential grade mufflers, construction activity limitation during noise-sensitive time periods, and reduced heavy equipment operation within close proximity of the Playa del Rey School.”

- 8.g** Volume I, Book 2, Section IV.E, Noise, Subsection 4.2, Mitigation Measures, Operational Noise, page 584. Replace first sentence of the second bullet with the following:

“Construct all exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Jefferson Boulevard and Bluff Creek with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the American Standard Test Methods E90 and E413.

- 8.h** Volume I, Book 2, Section IV.E, Noise, Subsection 4.2, Mitigation Measures, Operational Noise, page 584. Replace the third bullet on the page with the following:

“All HVAC and related roof-top mechanical equipment shall be installed in accordance with the City of Los Angeles Noise Ordinance, as applicable. Prior to issuance of temporary or permanent certificates of occupancy for each

building, an acoustical inspection shall be performed for each building to ensure building compliance with applicable interior and exterior noise criteria as specified by the City of Los Angeles Noise Ordinance.”

---

## II. CORRECTIONS AND ADDITIONS

### 9. NATURAL LIGHT-SHADING

---

**9.a** Volume I, Book 2, Section IV.F.(1), Natural Light-Shading, page 594, fourth paragraph, last sentence. Replace the sentence with the following:

“Second, the Project includes lot coverage restrictions that limit the coverage for residential lots to 55 percent, for commercial and mixed-use to 70 percent and for park sites (e.g. recreational facilities) to 15 percent.”

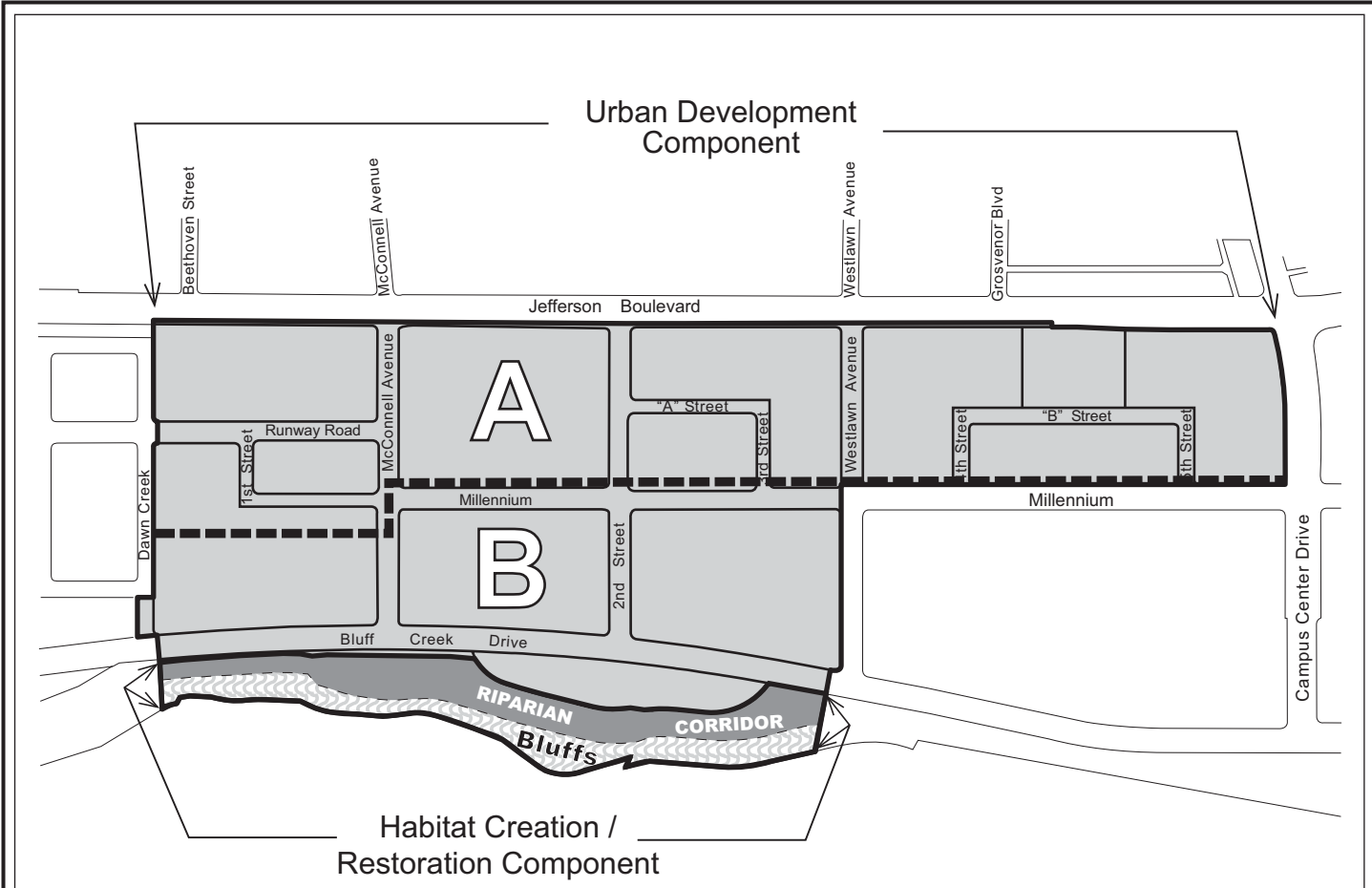
**9.b** Volume I, Book 2, Section IV.F.(1), Natural Light-Shading, Figure 43, page 595. Replace the figure with the revised Figure 43 as shown on page 194.

**9.c** Volume I, Book 2, Section IV.F.(1), Natural Light-Shading, Table 83, page 596. Replace the table with the revised Table 83 as shown on page 195:

**9.d** Volume I, Book 2, Section IV.F.(1), Natural Light-Shading, Figure 44, page 598. Replace the figure with the revised Figure 44 as shown on page 196 .

**9.e** Volume I, Book 2, Section IV.F.(1), Natural Light-Shading, Figure 45, page 599. Replace the figure with the revised Figure 45 as shown on page 197.



**9.f** Volume I, Book 2, Section IV.F.(1), Natural Light-Shading, Figure 46, page 600. Replace the figure with the revised Figure 46 as shown on page 198.



**LEGEND**

Height District	Above Mean Sea Level (AMSL)	Above Finished Grade <sup>a</sup>	Above Existing Grade <sup>a</sup>
A	95'	68' - 72'	71' - 88'
B	112'	85'-89'	88'-105'

<sup>a</sup> Height above finished grade and above existing grade are approximate. Finished grades will be approximately 23' to 27' AMSL. Existing grades vary from approximately 7' to 24' AMSL. Westchester Bluffs: Approximately 140' AMSL

 Urban Development Component  
 Habitat Creation / Restoration Component

0 400 800 Feet



Revised Draft EIR Figure 43, Proposed Height Limits

Source: PCR Services Corporation, March 2004

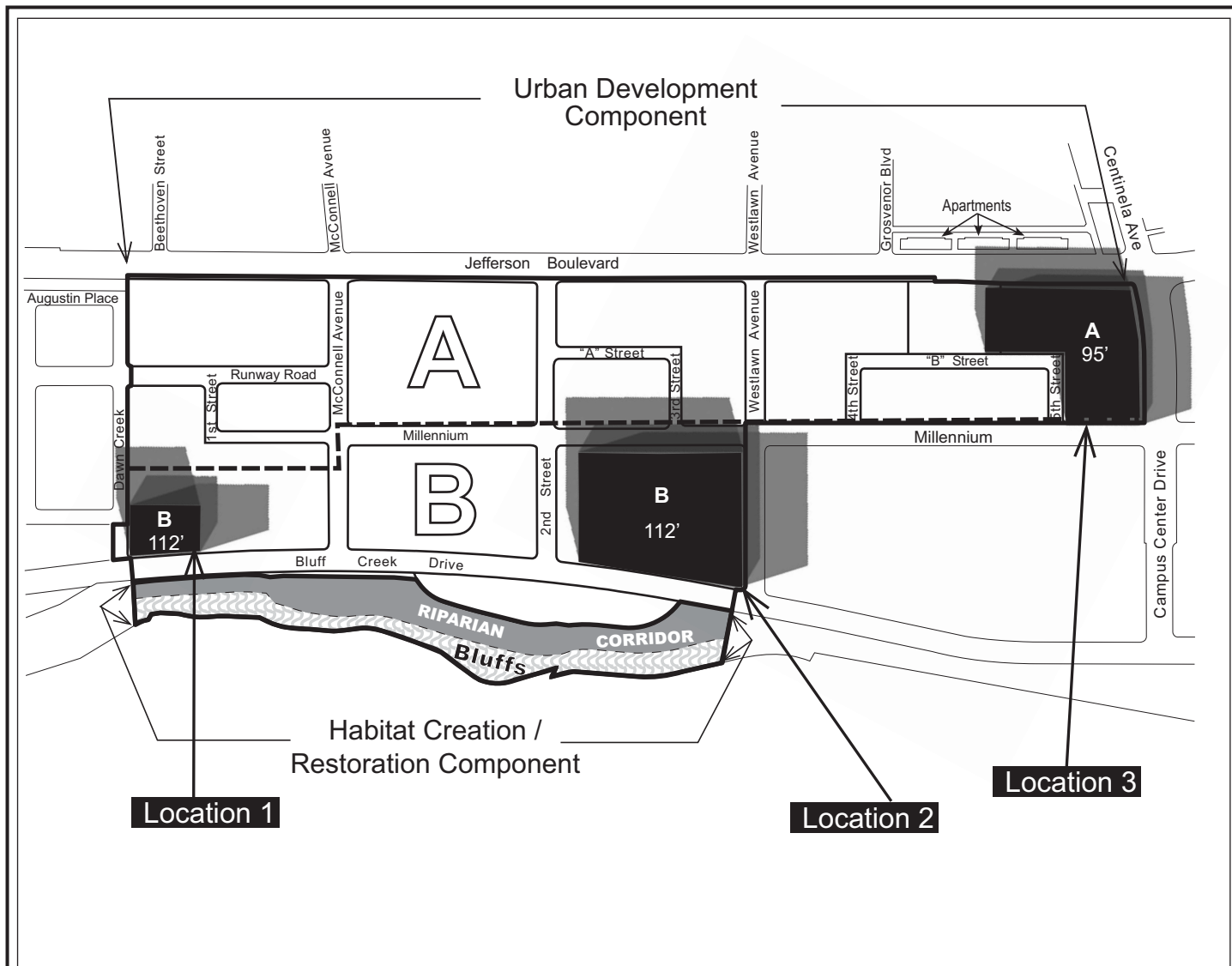
**Table 83**

**REVISED DRAFT EIR TABLE 83, PROPOSED SETBACK REQUIREMENTS**

<b>Location</b>	<b>Required Setback</b>	
<u>Thoroughfares</u>		
Jefferson Boulevard	15 Feet	(From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet	
Runway Road (Dawn Creek to McConnell)	15 Feet	(Residential Development will characterize this block.)
Millennium Road between 1st Street and McConnell	10 Feet	
Millennium Road (McConnell to 2nd Street)	0-5 Feet	(Street front retail/live-work residential will characterize this block.)
Millennium Road (Between 2nd Street and Campus Center Drive)	15 Feet	
McConnell Avenue	10 Feet	
McConnell Avenue (400 feet north of Millennium along the east side of the block)	0-5 Feet	(Street front retail will characterize this block.)
Westlawn Avenue	10 Feet	
Campus Center Drive	15 Feet	
1st, 2nd, 3rd, 4th, and 5th Street	10 Feet	
2nd Street (400 feet north of Millennium along the west side of the block)	0-5 Feet	(Street front retail will characterize this block.)
A and B Streets	10 Feet	
Dawn Creek	10 Feet	
<u>Setbacks from Adjacent Lots</u> <sup>a</sup>		
Adjacent to a Residential or Commercial Lot	10 Feet	
Adjacent to a Park or Open Space Lot	5 Feet	

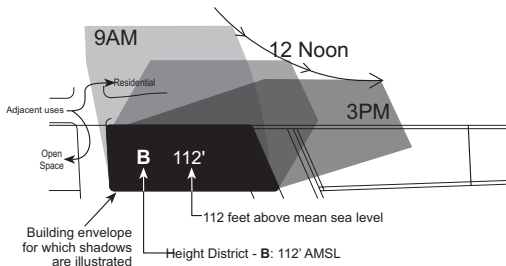
<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

Source: Playa Capital Company, 2004.



**LEGEND**

**Shading Diagram**



**Height Districts**

Height Districts (in feet above sea level)

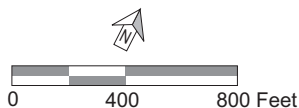
- A** 95' AMSL
- B** 112' AMSL



Urban Development Component

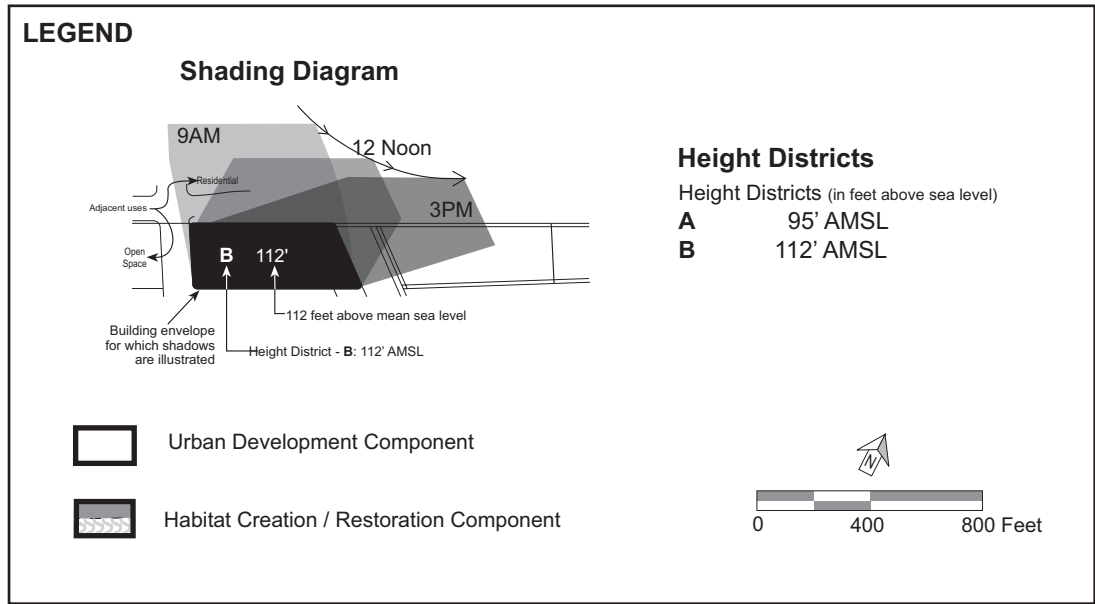
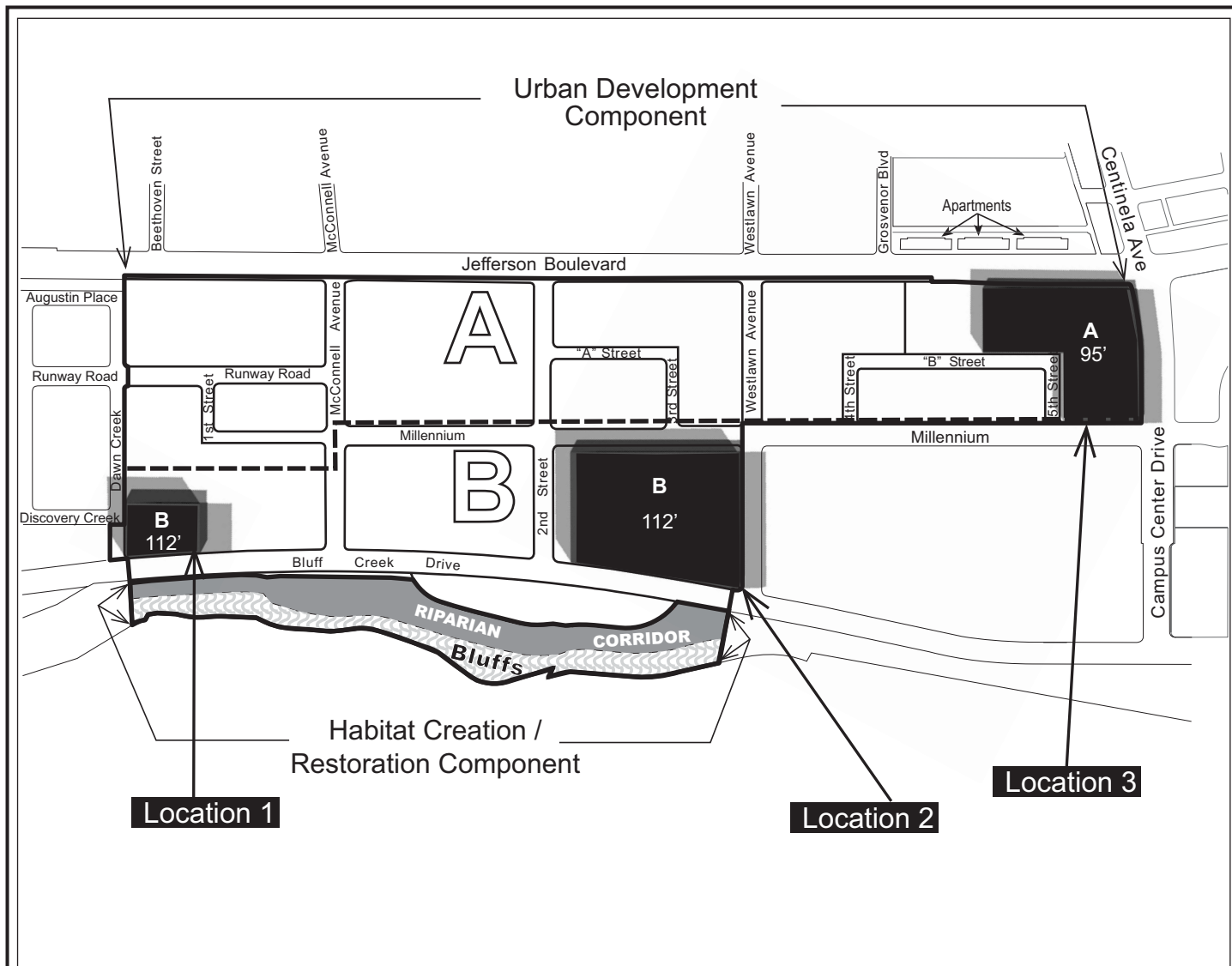


Habitat Creation / Restoration Component



Revised Draft EIR Figure 44,  
Shading Diagram for Winter Solstice

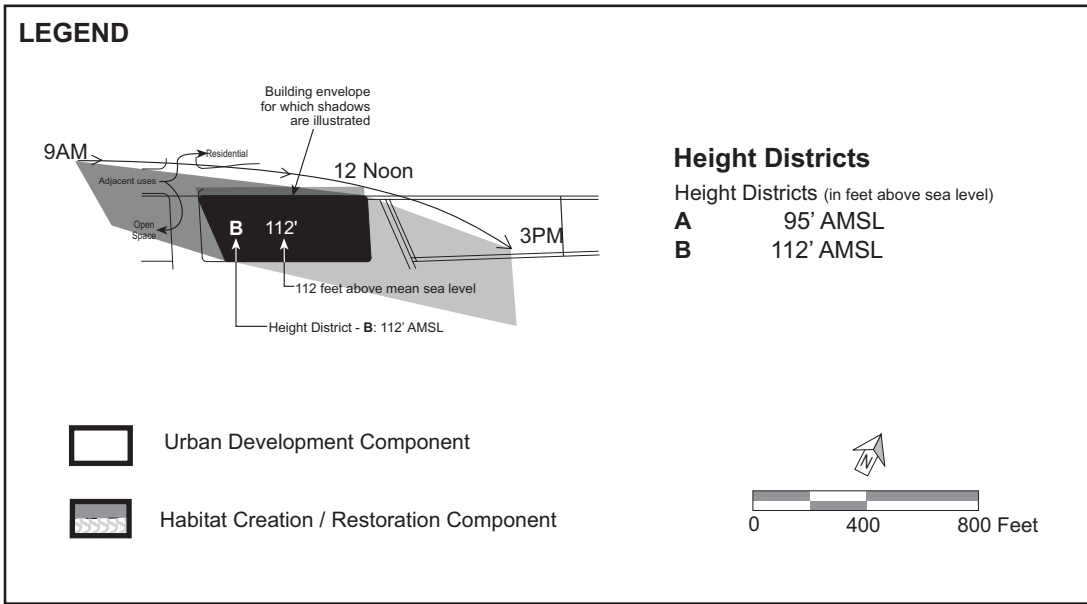
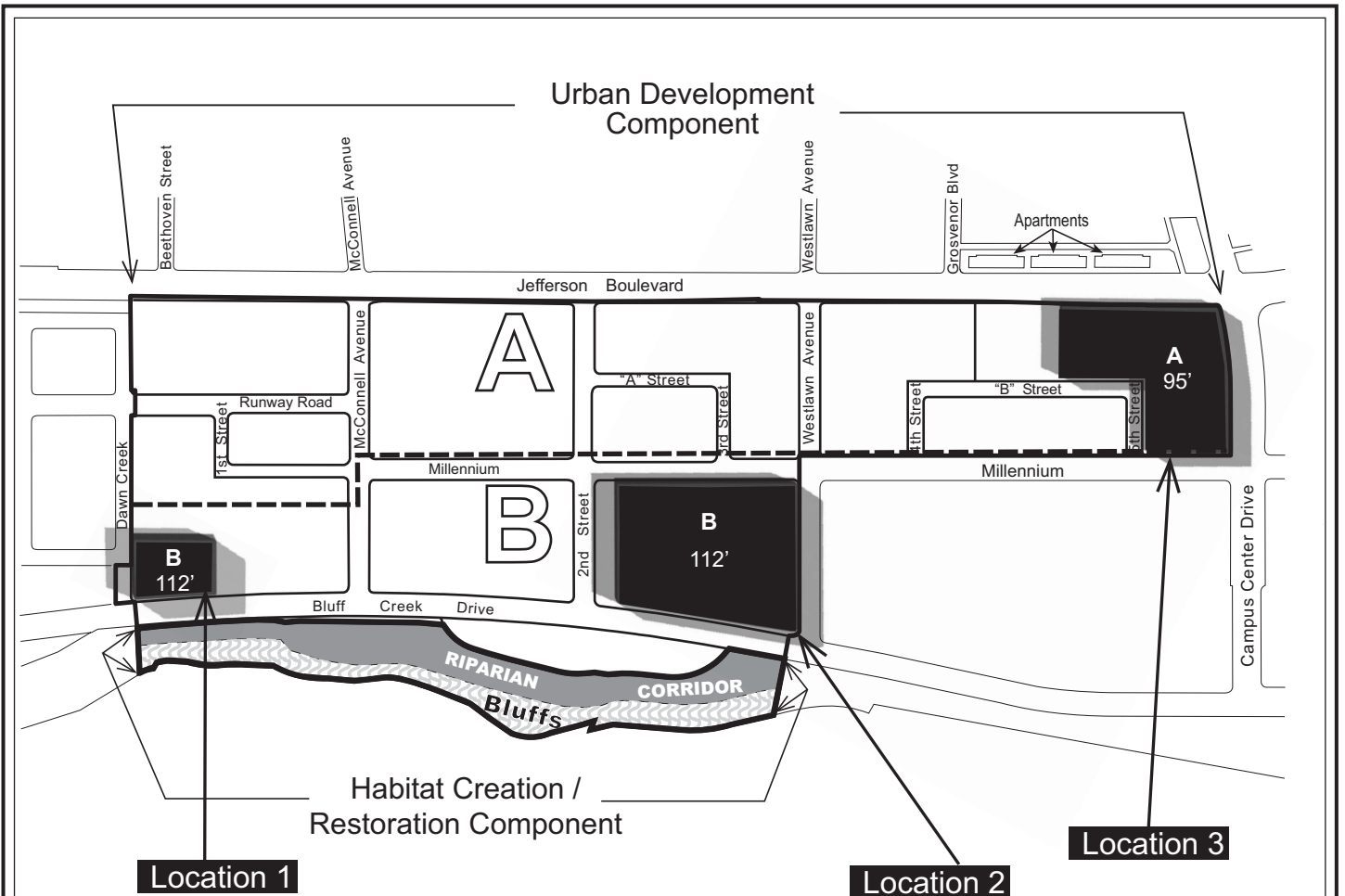
Source: PCR Services Corporation, March 2004



Revised Draft EIR Figure 45,  
Shading Diagram for Fall/Spring Equinox

Source: PCR Services Corporation, March 2004





Revised Draft EIR Figure 46,  
Shading Diagram for Summer Solstice

Source: PCR Services Corporation, March 2004

---

## II. CORRECTIONS AND ADDITIONS

### 10. ARTIFICIAL LIGHT AND GLARE

---

**10.a** Volume I, Book 2, Section IV.F.(2), Artificial Light and Glare, Subsection 4.0, Mitigation Measures, page 610. Replace the first mitigation bullet with the following:

- “All outdoor lighting for individual buildings, other than signs, shall be limited to those required for safety, security, low level exterior architectural illumination, and landscaping, except for temporary special events.”

**10.b** Volume I, Book 2, Section IV.F.(2), Artificial Light and Glare, page 610. Replace the last bullet on the page with the following:

- “The Applicant shall use exterior building materials and facades which eliminate or minimize highly reflective materials. At the time of plot plan review for specific development projects, building materials shall be reviewed to assure that they do not exceed the reflectivity of standard building materials. If the Applicant should desire to use more reflective materials in locations isolated from major thoroughfares, adequate analysis must be presented to the Department of City Planning to determine that the building, due to location, would not cause glare impacts on motorists or nearby population.”

**10.c** Volume I, Book 2, Section IV.F.(2), Artificial Light and Glare, page 611. Delete the bullet at the top of the page.

---

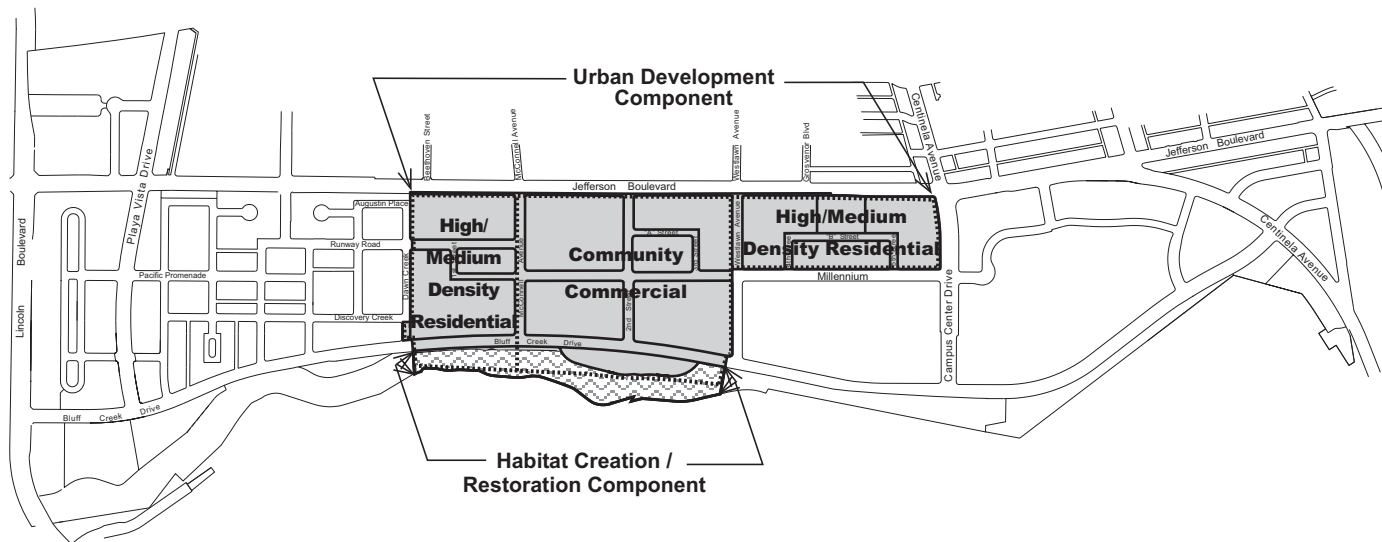
## II. CORRECTIONS AND ADDITIONS

### 11. LAND USE

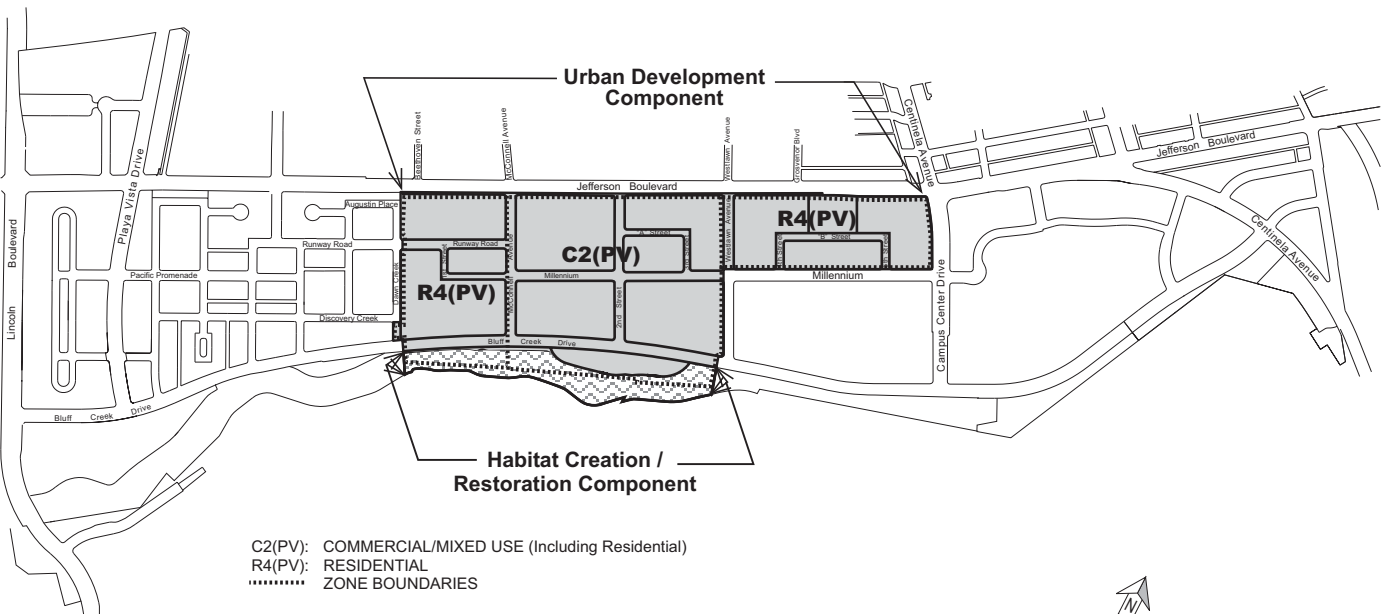
---

- 11.a** Volume I, Book 2, Section IV.G, Land Use, Figure 51, page 629. Replace the figure with the revised Figure 51 as shown on page 201.
- 11.b** Volume I, Book 2, Section IV.G, Land Use, Figure 52, page 631. Replace the figure with the revised Figure 52 as shown on page 202.
- 11.c** Volume I, Book 2, Section IV.G, Land Use, page 632, second and third bullets on top of the page. Replace the second and third bullets with the following:
- Commercial and Mixed Use Lots: The maximum lot coverage would be 70%; and
  - Park Sites: The maximum lot coverage would be 15% (for recreational and park support structures).
- 11.d** Volume I, Book 2, Section IV.G, Land Use, Table 87, page 633. Replace the table with the revised Table 87 as shown on page 203.
- 11.e** Volume I, Book 2, Section IV.G, Land Use, Figure 53, page 637. Replace the figure with the revised Figure 53 as shown on page 204.
- 11.f** Volume I, Book 2, Section IV.G, Land Use, Figure 54, page 638. Replace the figure with the revised Figure 54 as shown on page 205.

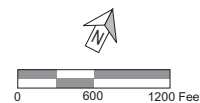
## Proposed General Plan Designations



## Proposed Specific Plan/Zoning Designations

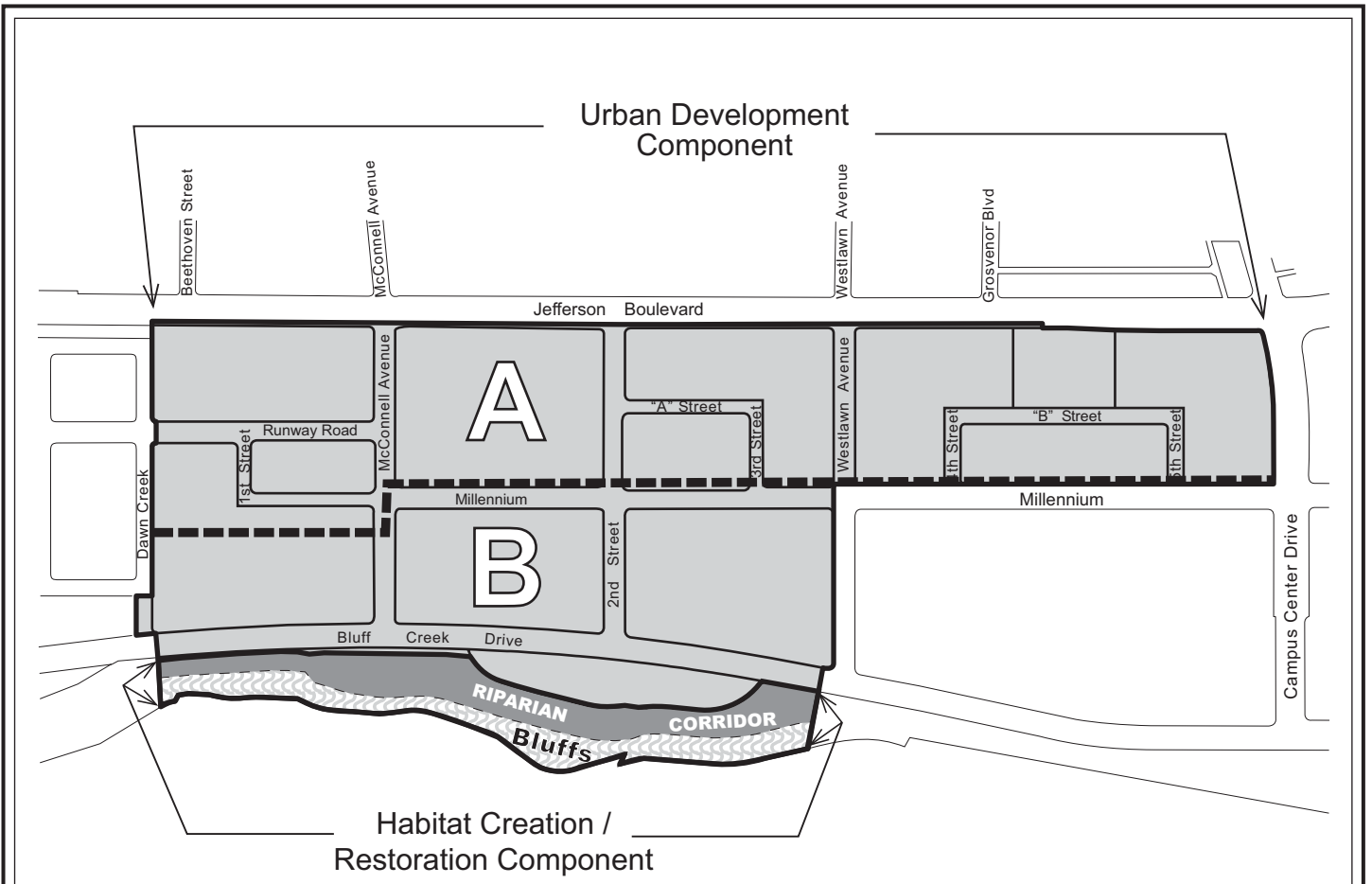


**NOTE:**  
 Locations of roadways and land use boundaries are approximate.  
 Precise placement will be determined as part of subdivision process.



**Revised Draft EIR Figure 51,  
 Proposed Plan Designations**



Source: Playa Capital Company, March 2004


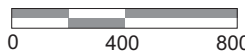


**LEGEND**

Height District	Above Mean Sea Level (AMSL)	Above Finished Grade <sup>a</sup>	Above Existing Grade <sup>a</sup>
<b>A</b>	95'	68' - 72'	71' - 88'
<b>B</b>	112'	85'-89'	88'-105'

<sup>a</sup> Height above finished grade and above existing grade are approximate. Finished grades will be approximately 23' to 27' AMSL. Existing grades vary from approximately 7' to 24' AMSL.  
Westchester Bluffs: Approximately 140' AMSL

 Urban Development Component  
 Habitat Creation / Restoration Component



**Revised Draft EIR Figure 52,  
Proposed Height Limits**

Source: PCR Services Corporation, March 2004

**Table 87**

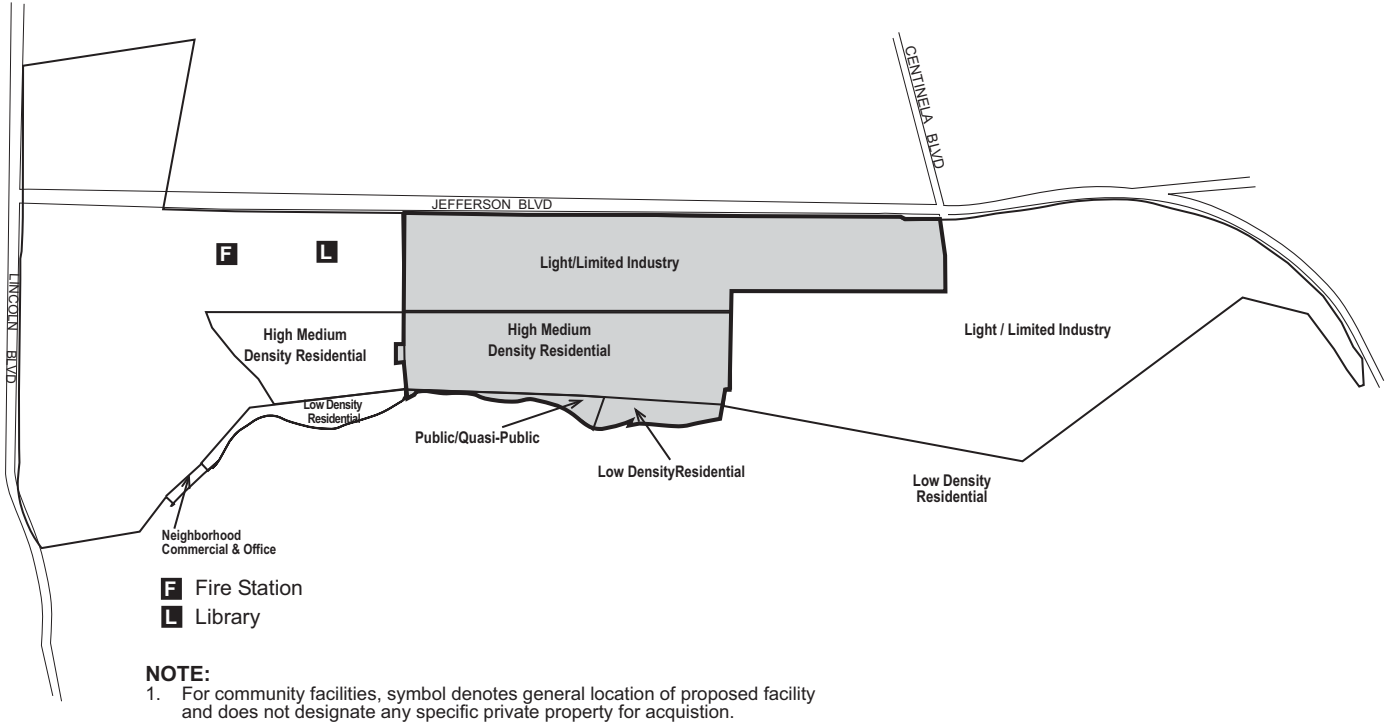
**REVISED DRAFT EIR TABLE 87, PROPOSED SETBACK REQUIREMENTS**

<u>Location</u>	<u>Required Setback</u>	
<u>Thoroughfares</u>		
Jefferson Boulevard	15 Feet	(From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet	
Millennium Road (Dawn Creek to McConnell)	15 Feet	(Residential Development will characterize this block)
Millennium Road between 1st Street and McConnell	10 Feet	
Runway Road (McConnell to 2nd Street)	0-5 Feet	(Street front retail/live-work residential will characterize this block.)
Millennium Road (Between 2nd Street and Campus Center Drive)	15 Feet	
McConnell Avenue	10 Feet	
McConnell Avenue (400 feet north of Millennium along the east side of the block)	0-5 Feet	(Street front retail will characterize this block.)
Westlawn Avenue	10 Feet	
Campus Center Drive	15 Feet	
1st, 2nd, 3rd, 4th, and 5th Street	10 Feet	
2nd Street (400 feet north of Millennium along the west side of the block)	0-5 Feet	(Street front retail will characterize this block.)
A and B Streets	10 Feet	
Dawn Creek	10 Feet	
<u>Setbacks from Adjacent Lots</u> <sup>a</sup>		
Adjacent to a Residential or Commercial Lot	10 Feet	
Adjacent to a Park or Open Space Lot	5 Feet	

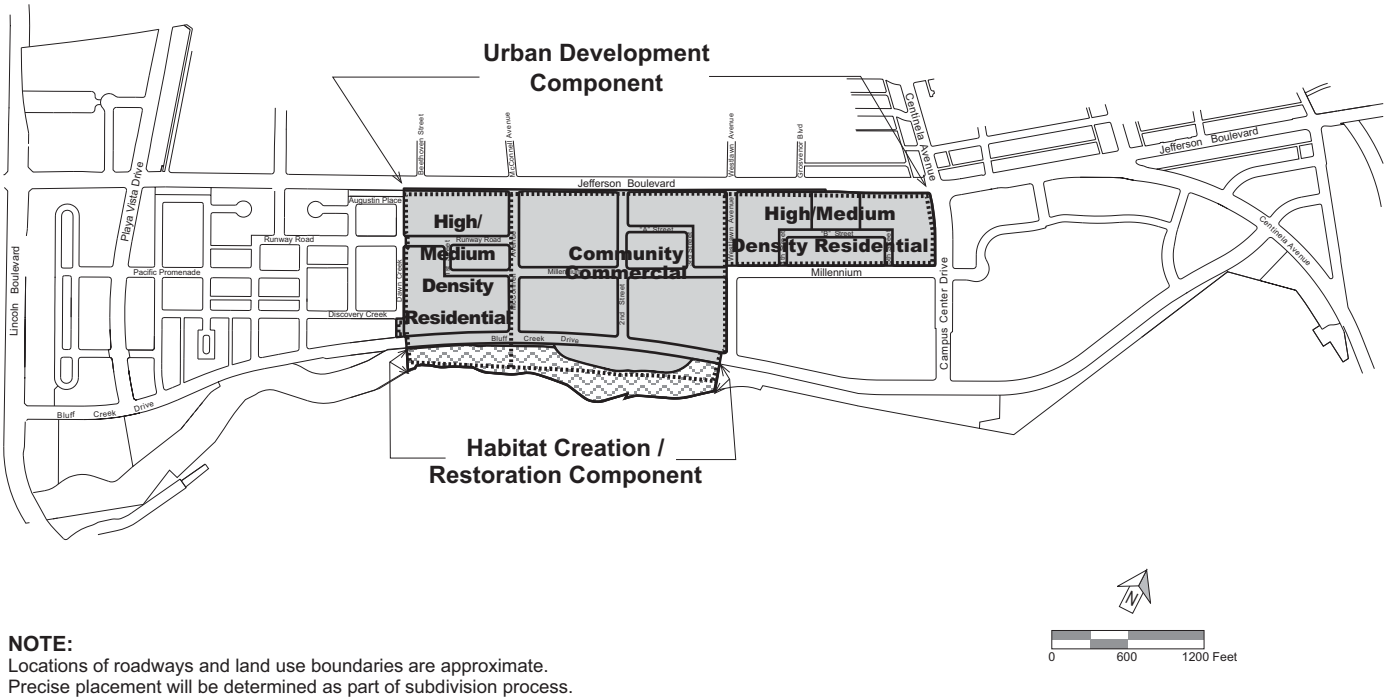
<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

Source: Playa Capital Company, 2004.

## Existing General/Community Designations Plan



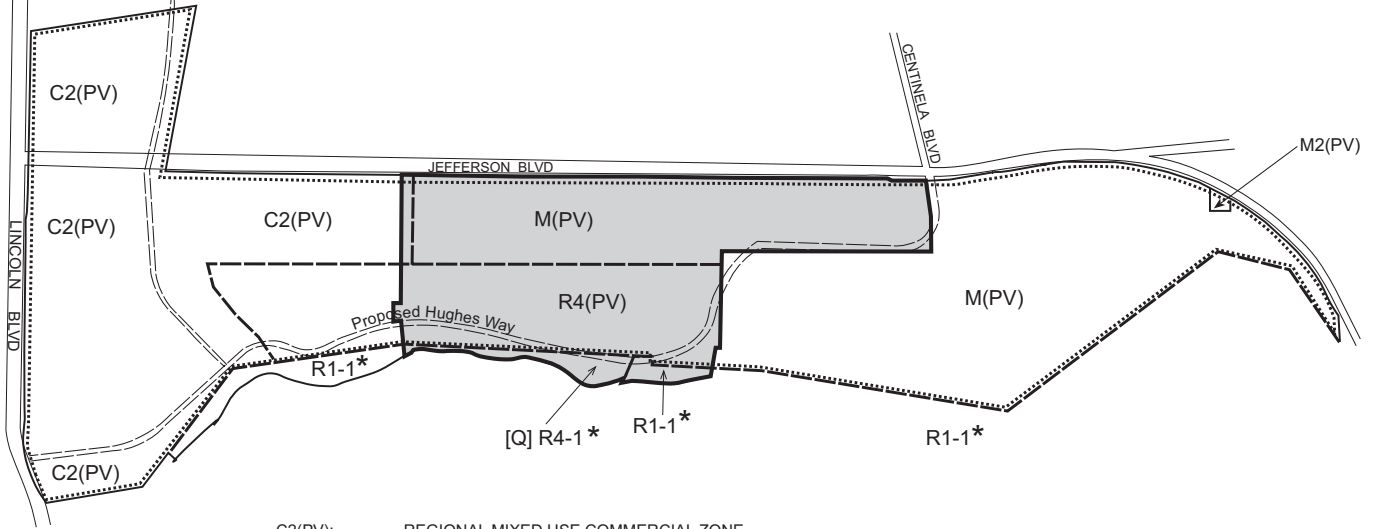
## Proposed General/Community Plan



Revised Draft EIR Figure 53,  
**Comparison of the Existing Community Plan  
 and the Proposed Designations**

Source: Playa Capital Company, March 2004

## Existing Specific Plan



C2(PV): REGIONAL MIXED USE COMMERCIAL ZONE  
 M(PV); M2(PV): INDUSTRIAL ZONE  
 R1-1; R4-1; R4(PV): RESIDENTIAL

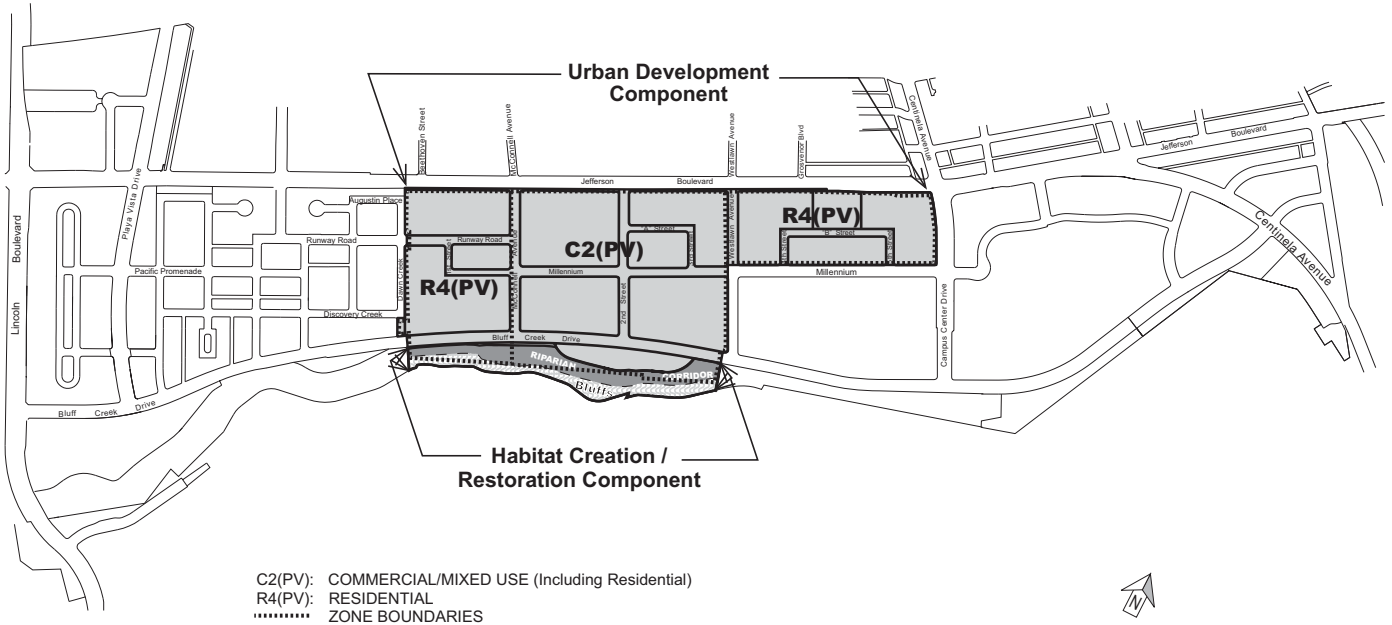
— Zone Boundary  
 ..... Specific Plan Boundary

**NOTE:**

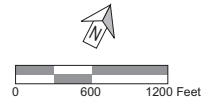
All conditions placed upon Specific Plan at the time of adoption by the City are also applicable. Existing Area D Specific Plan adopted November 21, 1985, amended 1996.

\* These zones lie outside of the Area D Specific Plan boundaries

## Proposed Specific Plan/Zoning Designations



C2(PV): COMMERCIAL/MIXED USE (Including Residential)  
 R4(PV): RESIDENTIAL  
 ..... ZONE BOUNDARIES



**NOTE:**

Locations of roadways and land use boundaries are approximate.  
 Precise placement will be determined as part of subdivision process.



Revised Draft EIR Figure 54,  
**Comparison of the Existing Specific Plan  
 and the Proposed Designations**

Source: Playa Capital Company, March 2004



- 11.g** Volume I, Book 2, Section IV.G, Land Use, Table 89, page 640. Replace the text in the cell showing Setbacks/Lot Coverage in the column for the Proposed Project with the following:

“Jefferson Boulevard, Bluff Creek Drive, Runway Road (part-way), Millennium Road (part-way), Campus Center Drive: 15 feet

Millennium Road (part-way), McConnell Avenue, Westlawn Avenue, 1st Street, 2nd Street, 3rd Street, 4th Street, 5th Street, A Street, B Street, and Dawn Creek: 10 Feet.

Limited Locations (Short segments of Millennium Road, McConnell Avenue and 2nd Street): 0 – 5 feet per character of street front retail.

Adjacent Lot – adjacent to residential or commercial lot: 10 feet (multifamily structures in two separately developed Projects separated by no less than 20 feet). Adjacent to park/open space lot: 5 feet.

Lot Coverage: Residential – 55%; Commercial and Mixed-Use – 70%; Parks – 15% (Recreation/park facilities)”

- 11.h** Volume I, Book 2, Section IV.G, Land Use, page 651. Replace the first bullet at the top of the page with the following:

“Lot 113 of VTTM 49104 shall remain as open space unless the Advisory Agency determines that this lot is not needed to meet the open space requirements of VTTM 49104.”

---

**II. CORRECTIONS AND ADDITIONS**  
**12. MINERAL RESOURCES**

---

There are no corrections and additions to this section of the Draft EIR.

---

## II. CORRECTIONS AND ADDITIONS

### 13. SAFETY/RISK OF UPSET

---

- 13.a** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 2.1.2., State Level, page 663. Add the following to the second to the last sentence of the first paragraph:

“Testing and inspection of safety devices for the gas storage field are regulated under Title 14, Division 2, Chapter 4, CCR, Section 1724.4.”

- 13.b** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, page 668. Add to Subsection 2.1.2.3 the following:

“California Health & Safety Code §§25220, et seq., provide for notification requirements with regard to certain contaminated properties. To the extent applicable, the Proposed Project will comply with requirements of these sections.”

- 13.c** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 2.2.1.1.1, Natural Gas Storage Reservoir, page 672. Replace the last sentence with the following:

“SCGC is regulated by DOGGR, which requires monthly reports on injection and extraction, and downhole monitoring of wells.”

- 13.d** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, page 685. Replace the first sentence in last paragraph with the following:

“Groundwater samples were collected under the site during the First Quarter 1999 through the First Quarter 2003. Supplemental groundwater samples were taken down-gradient of previously remediated areas in early 2002.<sup>296, 297,</sup>”

- 13.e** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, page 685. Replace footnote number 297 with the following:

“Camp Dresser & McKee, Inc., *Addendum to Soil and Groundwater Investigation Report, Phase 2 Portion of the Area D Project Area, Playa Vista Site*. August 6, 2003.”

- 13.f** Volume I, Book 2, Section IV.I, Safety/Risk of Upset. Replace the last sentence of the fourth paragraph with the following:

“With respect to BTEX, the vast majority (approximately 70 percent) of the samples taken throughout the Proposed Project site found none of the four BTEX constituents, based on a detection limit of 0.07 ppmv.”

- 13.g** Volume I, Book 2, Section IV.I, Safety/Risk of Upset. In footnote 382, replace the reference to “less than .03 ppmv” with “...less than 0.003 ppmv...”

- 13.h** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, page 715. In footnote 332, replace the reference to “an error” with “anomalous or a very temporary, localized condition.”

- 13.i** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Figure 60, page 718. Replace the figure with the revised Figure 60 as shown on page 210.

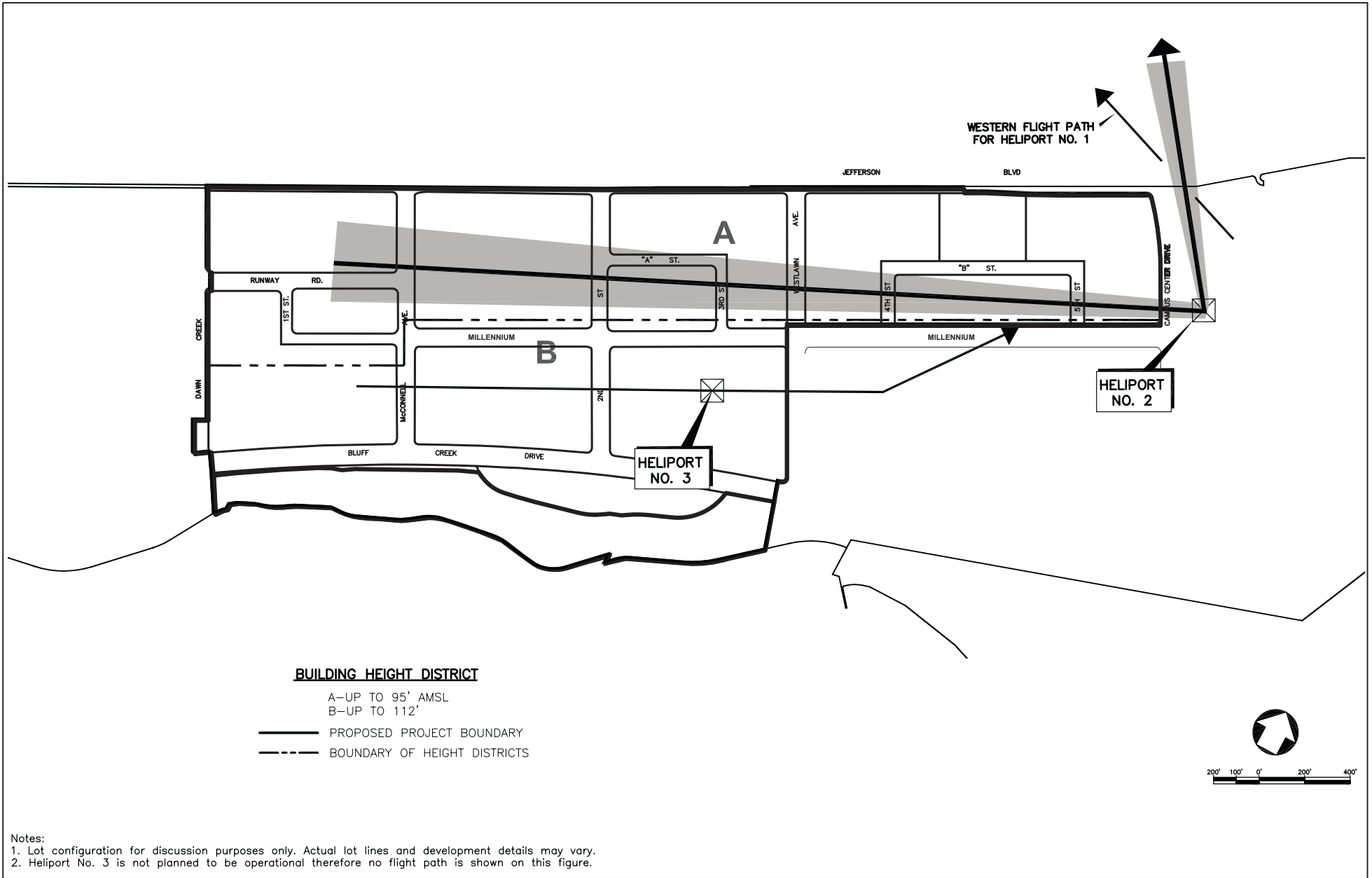
- 13.j** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, page 736. Replace the two mitigation measures for Hazardous Material Management with the following:

“Prior to issuance of demolition permits for Buildings 22, 45 and other sheds and small storage buildings, evidence shall be provided to the City of Los Angeles Department of Building and Safety that the demolition contract provides for a qualified asbestos and lead based paint removal contractor/specialist to remove or otherwise abate asbestos and lead based paint prior to or during demolition activities in accordance with federal state, and local regulations.”

“Prior to issuance of demolition permits for Buildings 22, 45, and other sheds and small storage buildings, evidence shall be provided to the City of Los Angeles Department of Building and Safety that the demolition contract provides continuous compliance with all applicable government regulations and conditions related to hazardous materials and wastes management.”

- 13.k** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Figure 61, page 729. Replace the figure with the revised Figure 61 as shown on page 211.

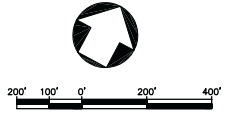
- 13.l** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 737. Replace the first full bullet with the following:



WESTERN FLIGHT PATH FOR HELIPORT NO. 1

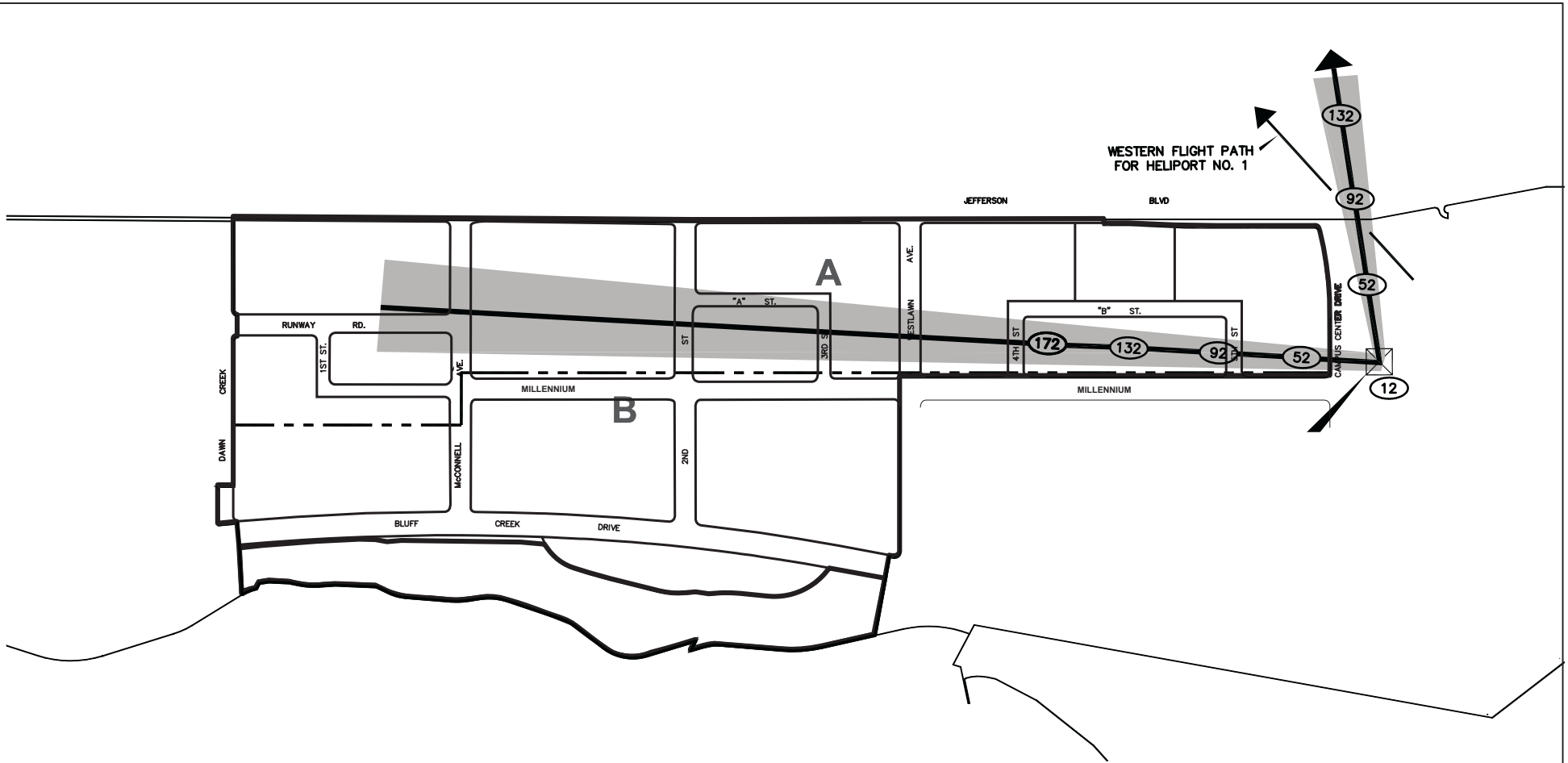
HELIPORT NO. 2

HELIPORT NO. 3



Revised Draft EIR Figure 60, Heliport Locations and Flight Paths



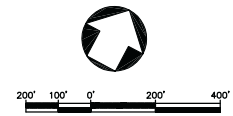


**BUILDING HEIGHT DISTRICT**

A—UP TO 95' AMSL  
 B—UP TO 112'

**AIR SPACE CLEARANCE HEIGHT**

- ELEVATION, IN FEET ABOVE MSL, ALONG FLIGHT PATH AT 8:1 SLOPE EXTENDING FROM PRIMARY LANDING AREA. BUILDING HEIGHTS IN EXCESS OF "XX" VALUE WOULD ENCROACH IN TO HELIPORT AIR SPACE.
- PROPOSED PROJECT BOUNDARY
- BOUNDARY OF HEIGHT DISTRICTS



Note: Lot configuration for discussion purposes only. Actual lot lines and development details may vary.

Revised Draft EIR Figure 61,  
**Relationship of Proposed Building Heights  
 to Heliport Flight Paths**

- “To address the potential that VOC-contaminated soils, groundwater, and/or other materials may be encountered during excavation and grading, the applicant contractor(s) selected for excavation and grading work shall maintain a valid South Coast Air Quality Management District (SCAQMD) Rule 1166 permit plan (i.e., approval of a Contaminated Soil Mitigation Plan) for areas of known or suspected contamination, and be prepared to control nuisance odors per SCAQMD Rules and Regulations.”

**13.m** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 737. Replace the fourth bullet with the following:

- “Grading and demolition contractors shall be required by construction specifications to secure approval of haul routes to export or otherwise transport off-site excavated materials prior to commencement of such activity, pursuant to LAMC Section 91.7006.”

**13.n** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 737. Replace the fifth bullet on the page with the following:

- “Prior to issuance of a grading permit or B-Permit for activities involving construction dewatering, evidence shall be provided to the LADBS or City of Los Angeles Department of Public Works (LADPW), as appropriate, that a valid National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge permit is in place. The NPDES or Industrial Waste Discharge permit shall include provisions for evaluating the groundwater for potential contamination, and, if necessary, the need for treatment of dewatering discharge.”

**13.o** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 738. Add the following bullet under the last bullet under “Soil/ Groundwater Contamination:

- “The Applicant shall implement a soil import procedure to evaluate imported soils, satisfactory to the Regional Water Quality Control Board. The procedure shall include investigation of historical uses at the borrow site, soil sampling and analysis of soil prior to excavation and hauling to the site, and comparison of detected concentrations of any chemicals found in soil with appropriate health-based screening levels. Only soils that pass the screening shall be imported to the site and used as fill.”

**13.p** Volume I, Book 1, Section IV.I, page 738. Replace the first bullet mitigation measure under Methane Safety System for Long-Term Project Operations with the following:

- “Prior to issuance of a building permit for individual development projects within the Proposed Project site, the permit applicant shall submit to the LADBS a methane safety plan prepared by a licensed engineer. The methane safety plan shall conform to the Village at Playa Vista Building Methane Mitigation Guidelines and Methane Mitigation Standard, or the City’s Methane Ordinance No. 175,790, provided that the requirements in that new ordinance continue to reduce the potentially significant impact to a less than significant level. The methane safety plan or site investigation/construction plan shall report the following: methane concentration levels that exist at the area of the proposed construction/improvement and shall specify the appropriate methane safety measures that are incorporated into the design, construction, and operation of the subject improvement. Based on the levels of methane identified at specific sites, a gas detection system, pressure sensors, ventilation, monitoring, and emergency procedures, and other measures as provided for in the Village at Playa Vista Building Methane Mitigation Guidelines or the City’s Methane Ordinance No. 175,790 shall be required, as appropriate. Mitigation systems for each building shall be based on a site investigation in combination with the Village at Playa Vista Building Methane Mitigation Guidelines or the City Methane Ordinance. Any variations to the Village at Playa Vista Building Methane Guidelines and Table XX or the City Methane Ordinance are subject to the joint approval of the LADBS and the Los Angeles Fire Department (LAFD) when engineering and other data and analysis demonstrates an equivalent level of building safety. The specific design elements of the methane requirements shall be subject to the review and approval of the LADBS in consultation with the LAFD.”

**13.q** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 738. Replace the third bullet with the following:

- “Prior to issuance of a B-Permit for public works projects or a building permit for subsurface utility improvements with the Proposed Project site, the permit applicant shall submit to the City of Los Angeles Department of Public Works (LADPW), a methane safety plan or site investigation/construction plan prepared by a licensed engineer who is acceptable to LADPW. The methane safety plan or site investigation/construction plan shall indicate the methane concentration levels that exist at the area of the proposed construction/improvement and shall specify the appropriate methane safety measures that are incorporated into the design, construction, and operation of the subject facility. The specific contents of the methane safety plan or site investigation/construction plan and the nature and extent of safety provisions described therein shall be subject to the discretion, review, and approval of the LADPW in consultation with the LAFD.”

**13.r** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 739. Replace second sentence of the first bullet with the following:



- “Prior to issuance of any building permit within a lot affected by discovery of an unrecorded oil well, the Applicant shall submit a final clearance letter issued by DOGGR regarding the proper abandonment of the well(s) to the Department of Building and Safety and the Fire Department.”

**13.s** Volume I, Book 2, Section IV.I, Safety/Risk of Upset, Subsection 4.0, Mitigation Measures, page 739. Replace the fifth bullet with the following:

- “To address the potential that VOC-contaminated soils, soil groundwater, and/or other materials may be encountered during excavation and grading, the contractor(s) selected for excavation and grading work shall maintain a valid SCAQMD Rule 1166 permit plan (i.e., approval of a Contaminated Soil Mitigation Plan) for areas of known or suspected contamination, and be prepared to control nuisance odors per SCAQMD Rules and Regulations.”

---

**II. CORRECTIONS AND ADDITIONS**  
**14. POPULATION, HOUSING AND EMPLOYMENT**

---

- 14.a** Volume I, Book 2, Section IV.J, Population, Housing, and Employment, page 745, fourth paragraph, third sentence. Replace with the following:

“The 2001 RTP uses 1997 as the base year with projections for the years 2005, 2010, 2015, 2020, and 2025.”

- 14.b** Volume I, Book 2, Section IV.J, Population, Housing, and Employment, page 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.

---

## II. CORRECTIONS AND ADDITIONS

### 15. TRAFFIC AND CIRCULATION

---

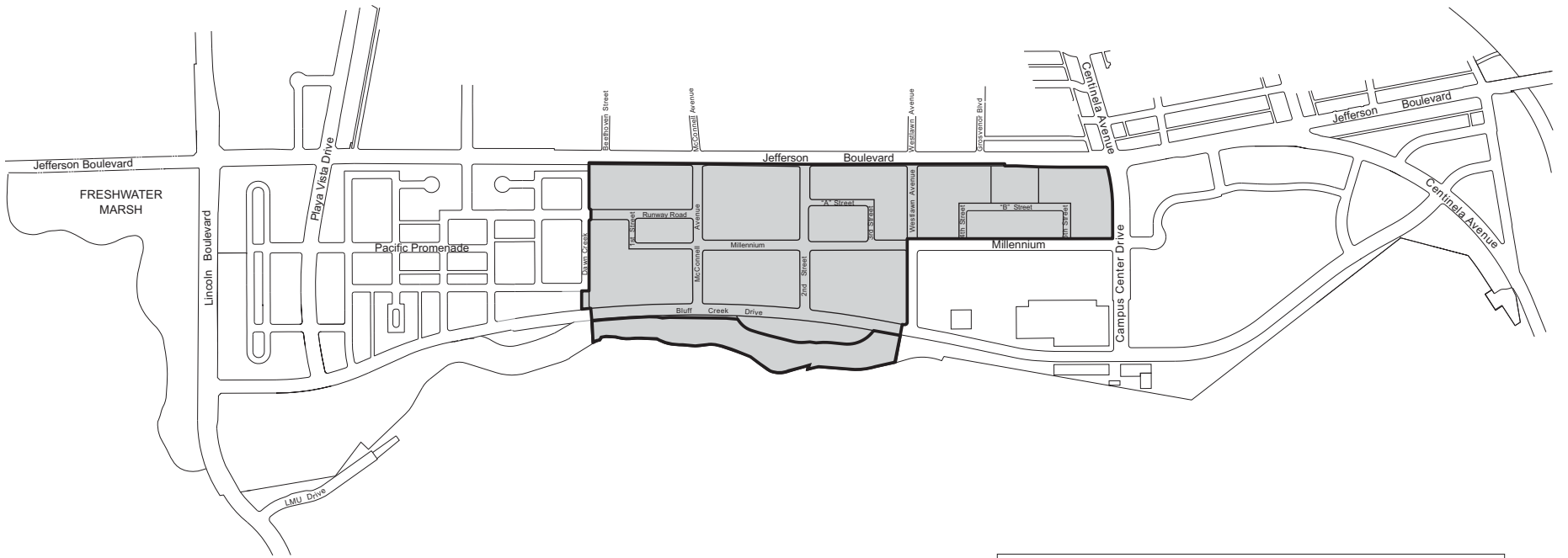
- 15.a** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, pages 832-833, change all “=” signs to “≥” to correct a typographical error.
- 15.b** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 833, first bullet under first paragraph in Subsection 3.2.3. Replace with the following:
- “ADT increase  $\geq$  120 trips if final ADT\* <1,000”
- 15.c** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Figure 69, page 838. Replace the figure with the revised Figure 69 as shown on page 217.
- 15.d** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 859. Add the following new Subsections immediately before Subsection 3.4.3.

#### **“3.4.2.1 SB 666 and the Playa Vista Drive Bridge and Road**

As discussed in Section II.D on page 179, Area A and a portion of Area B was the subject of an Option Agreement between Trust for Public Land and the Applicant for sale to the State of California. The State of California completed the acquisition of these areas in December 2003. In addition, the Applicant is no longer required to plan and entitle Area C, which is owned by U.S. Trust Company for the benefit of the State of California, and Area C is no longer included with the Planning Area for Playa Vista. Area C is currently scheduled for transfer to the State of California.

Pursuant to agreements with the State, the State required that an extension of Playa Vista Drive across the Ballona Channel and across Area C to intersect with Culver Boulevard not be constructed, in order to maintain the integrity of Area C for open space. The Applicant relinquished its rights to construct the Playa Vista Drive bridge and road in connection with the sale to the State.

Further, in connection with the acquisition of Areas A and B and the relinquishment of rights over Area C, the State Legislature passed SB 666. SB 666 provides that construction of the Playa Vista Drive bridge and road is inconsistent with the State's interest in the preservation of the Area C property and therefore future construction of the Bridge is not permitted. As a result of the relinquishment of the rights to build the Playa



Revised Draft EIR Figure 69,  
Proposed Roadway System

Source: Psomas and Associates & PCR Services Corporation, March 2004

Vista Drive bridge and road and the passage of SB 666, the Playa Vista Drive bridge and road extension to Culver Boulevard will not be part of the transportation system and is no longer part of the baseline conditions for the year 2010.

### **3.4.2.2 No Playa Vista Drive Bridge and Road 2010 Baseline Scenario**

As discussed in Section 3.1, the Traffic Study includes an analysis of the Proposed Project's impacts under two scenarios. One scenario assumes the Playa Vista Drive bridge and road extension to Culver Boulevard is part of the 2010 baseline conditions. The Traffic Study set forth detailed model runs showing this 2010 baseline condition, as shown in Appendices K-2, K-4, and K-5. A second scenario assumed that the Playa Vista Drive bridge and roadway extension to Culver Boulevard was not part of the transportation system in the 2010 conditions. The Traffic Study set forth detailed model runs showing the 2010 "No Playa Vista Drive Bridge and Road" scenario, as shown in Appendices K-2, K-4, and K-5. The proposed land use definition and trip generation does not change under either baseline scenario.

With the completion of the sale to the State of California and the relinquishment of the rights to construct the Playa Vista Drive Bridge and road, the baseline conditions as reflected in the Traffic Study exclude the bridge and road from the street system analyzed in the transportation model. Appendix K-2, beginning on page IX-3 shows 2010 Baseline Conditions under this scenario, 2010 Baseline Conditions with the Project added, and 2010 Baseline Conditions with the Project and proposed mitigation measures.

The forecasted 2010 roadway conditions, prior to the implementation of the Proposed Project, is shown in Table 9-2 of Appendix K-2. In summary, under the 2010 Baseline Conditions, 86 intersections would operate at LOS E or F in the A.M. peak hour, and 103 would operate at LOS E or F in the P.M. peak hour out of a total of 216 intersections. In comparison, for the 2003 base period, 42 intersections operate at LOS E or F during the A.M. peak hour and 49 intersections operate at this level of service during the P.M. peak hour. The increase in levels of service from 2003 to 2010 is reflective of the growth in regional traffic."

- 15.e** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 868. Add the following new Subsection at the end of Subsection 3.4.5.1, and renumber Subsection 3.4.5.2 to 3.4.5.3:

### **“3.4.5.2 No Playa Vista Drive Bridge and Road 2010 Baseline Scenario - Prior to Mitigation**

As discussed in Section 3.4.1.2, the Traffic Study includes model simulations representing transportation network conditions without the Playa Vista Drive bridge and road connection to Culver Boulevard.

Simulations were performed both with and without the Proposed Project and intersection traffic forecasts for each of these scenarios was developed. Both A.M. and P.M. peak hour simulations were evaluated. The summaries of projected traffic operating conditions for both the 2010 No Project and 2010 With Project scenarios are provided in Appendix K-2, beginning on page IX-3(a). The capacity calculation worksheets also are included in Appendix K-5.

Under the “No Playa Vista Drive Bridge and Road” scenario, during the A.M. peak hour, the Proposed Project prior to mitigation would result in a significant impact to a total of 5 intersections operating at LOS C or LOS D, 10 intersections operating at LOS E and 16 intersections operating at LOS F. During the P.M. peak hour, the Proposed Project would, prior to mitigation, result in a significant impact to 8 intersections operating at LOS C or LOS D, 15 intersections operating at LOS E, and 25 intersections operating at LOS F. The Proposed Project would not result in a significant impact to the remaining study intersections (185 intersections in the A.M. peak hour and 168 intersections in the P.M. peak hour out of 216 analyzed intersections would not have a significant impact).<sup>1</sup>

Thus, prior to mitigation, the Proposed Project would have a significant impact on 31 intersections in the A.M. peak hour and 48 intersections in the P.M. peak hour. Compared to the 2010 Baseline with the Playa Vista Drive bridge and road, the same number of intersections are impacted in the A.M. peak hour but one additional intersection (Centinela Avenue at Culver Boulevard) is impacted in the P.M. peak hour (note – this intersection is impacted during the A.M. peak hour under both scenarios). This intersection would be mitigated to a less than significant level under either baseline scenario with implementation of the mitigation program discussed in Subsection 4.0.”

- 15.f** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 868. Add the following to the end of renumbered Subsection 3.4.5.3:

<sup>1</sup> *Under the No Playa Vista Drive bridge and road 2010 Baseline Scenario, 2 of the 218 analyzed intersections within the Study Area (Playa Vista Drive/Culver Blvd., and Playa Vista Drive/”B” Street) would not be constructed.*

“Under the alternative 2010 no Playa Vista Drive bridge and road scenario with the proposed project, the project impacts at the arterial monitoring locations (CMP intersections) analyzed in this study would remain the same as shown in Table 121 on page 869. The shifts in traffic due to the elimination of the Playa Vista Drive bridge from the future roadway network are limited. Because of the distance of the CMP locations from the Proposed Project, these traffic shifts do not change traffic volume capacity ratios at any of the CMP intersections. Therefore, there would be no difference in project impacts at any of the arterial monitoring locations.”

- 15.g.** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 884. Replace the second paragraph under Section 3.4.11 with the following two paragraphs:







“The trip generation for the equivalency program scenarios would be the same as those of the Proposed Project during the P.M. peak hour and less than that of the Proposed Project during the A.M. peak hour, both with and without the Playa Vista Drive bridge and road. Impacts on intersections, freeways, neighborhood streets and public transit resulting from the amount of vehicle trips generated also would not change. Trip generation of the equivalency program scenarios does not exceed that of the Proposed Project with or without the Playa Vista Drive bridge and road. Impacts associated with implementation of the Equivalency Program under the “No Playa Vista Drive bridge and road” baseline conditions would not exceed those of the Proposed Project under the Playa Vista Drive bridge and road baseline scenario. Additionally, since the site’s entry points under the Equivalency Program would be the same as with the Proposed Project, and the levels of service at the entry intersections would all be better than or equal to the acceptable LOS D, under both with and without Playa Vista Drive bridge and road baseline conditions, impacts regarding Project access would also be the same. Likewise, with the similar construction requirements for the development of on-site roadways and building pads under both the with and without the Playa Vista Drive bridge and road baseline conditions, construction impacts would also be similar.


All Project Design Features (as discussed in Subsection 3.3, above) and/or recommended mitigation measures (discussed in Subsection 4.0, Mitigation Measures, and Section II.15, Correction and Additions, of the Final EIR) would be implemented under the Equivalency Program scenarios. Consequently, with implementation of applicable mitigation measures, traffic impacts attributable to the Equivalency Program would not exceed those with the Proposed Project under either baseline scenario (i.e., with or without Playa Vista Drive bridge and road).”

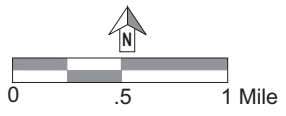
- 15.h** Volume I, Book 3, Section IV.L.(1), Traffic and Circulation, Figure 77, page 889. Replace the figure with the revised Figure 77 as shown on page 221.



**LEGEND**

-  Additional Mitigation Measure
-  Improvement Corridor
-  Intersection Widening / Restriping
-  Restriping
-  Signal/ATCS
-  City/County Boundary

 Proposed Village at Playa Vista



Revised Draft EIR Figure 77,  
Roadway Improvement Mitigation Measures

Source: PCR Services Corporation, March 2004



**15.i** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 898. Add the following new mitigation measure after the last bullet (immediately preceding the County of Los Angeles Mitigation Measures):

- *Campus Center Drive.* Provide for full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium, through a public access agreement, irrevocable offer to dedicate, or other mechanism acceptable to LADOT and the Department of Public Works.”

**15.j** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 903. In the Construction Impact Measures for the Proposed Project at the bottom of the page, add the following as the first item in the list of items to be included in the construction management plan:

“Notify residents and business owners ahead of construction activity which may affect traffic through signage, advertisements, or other means as appropriate.”

**15.k** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 904. After the sixth dashed item at the top of the page, add the following three items:

- “The construction manager or designee for each construction project shall notify the LAUSD’s Transportation Branch and the local school administrator regarding the expected start and ending dates for Project construction that may affect existing pedestrian and vehicular routes serving Playa del Rey School.”
- “No staging or parking of construction vehicles, including vehicles to transport workers, shall occur on streets adjacent to Playa del Rey School.”
- “The Pedestrian Routes Map (Attachment F to the MMRP) shall be reviewed, and potential safety issues identified in the preparation of the Construction Traffic Management Plan.”

**15.l** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 904. Replace the second bullet on the page with the following:

“Prior to the issuance of any grading permit for the Project, required permits for the truck haul routes shall be obtained from Los Angeles Department of Transportation (LADOT), Caltrans, and other affected jurisdictions.”

**15.m** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 904. In the Construction Impact Measures for Off-Site improvements at the bottom of the page, add the following as the first mitigation measure:

“Notify residents and business owners ahead of construction activity which may affect traffic through signage, advertisements, or other means as appropriate.”

**15.n** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 905. After the third bulleted item at the top of the page, add the following two items:

- “The construction manager or designee for each construction project shall notify the LAUSD’s Transportation Branch and the local school administrator regarding the expected start and ending dates for Project construction that may affect existing pedestrian and vehicular routes serving Playa del Rey School.”
- “The Pedestrian Routes Map (Attachment F to the MMRP) shall be reviewed, and potential safety issues identified in the preparation of the Construction Traffic Management Plan.”

**15.o** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Table 130, page 908. Make the following revisions in the “2010 with Project and Mitigation Program” column to correct typographical errors:

“88th Street/La Tijera Boulevard/Sepulveda intersection, page 908, replace the PM V/C, LOS and V/C increase, respectively, with the following: “0.905,” “E,” “-0.008.”

**15.p** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 931. Replace the current Subsection 5.1.5 with the following revised version:

**“5.1.5 No Playa Vista Drive Bridge and Road 2010 Baseline Scenario - After Mitigation**

As discussed in Section 3.4.5.2, compared to the 2010 Baseline with the Playa Vista Drive bridge and road, the same number of intersections are impacted in the A.M. peak hour but one additional intersection (Centinela Avenue at Culver Boulevard) is impacted in the P.M. peak hour. This intersection is mitigated to a less than significant level under either 2010 baseline scenarios with implementation of the mitigation program identified in Section 4.0. As discussed in Section 5.1.2, the traffic analysis identified one remaining significant impact at the intersection of Centinela Avenue and Jefferson Boulevard. An additional mitigation measure (provision of full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium Road within the adjacent Playa Vista First Phase Project) has been identified that would reduce the remaining significant impact at Centinela Avenue and Jefferson Boulevard to a less than significant level.

An analysis of the Proposed Project's impacts after mitigation was performed for all of the intersections studied as shown in Table 9-2 of Appendix K-2. Prior to mitigation, significant impacts occur at 31 intersections in the A.M. peak hour and 48 intersections in the P.M. peak hour. As shown in Table 9-3 of Appendix K-2, with implementation of the mitigation measures, including the additional measure identified above, there would be no significant impacts during either the A.M. or P.M. peak hours.

In summary, Table 9-3 in Appendix K-2 shows that with the Proposed Project, 92 intersections would operate at LOS E or F in the A.M. peak hour and 108 intersections would operate at this level of service in the P.M. peak hour. With mitigation, including the new mitigation measure at Campus Center Drive, 84 intersections would operate at LOS E or F and in the A.M. peak hour and 102 intersections would operate at this level of service in the P.M. peak hour. Further, no significant traffic impacts would remain.

Thus, under the 2010 no Playa Vista Drive bridge and road scenario, implementation of the additional proposed mitigation measure would eliminate the sole significant impact at Jefferson Boulevard and Centinela Avenue. Therefore, the Proposed Project will not have any significant impacts after mitigation.

The additional mitigation measure in the 2010 no Playa Vista Drive bridge and road baseline would affect the volume to capacity ratio at five intersections. The new mitigation measure will improve the intersection of Jefferson Boulevard and Centinela Avenue to LOS D (fair service) in both the A.M. and P.M. peak hours. At two other intersections, the level of service would not change, but the volume to capacity ratio would increase. However, these intersections would operate at an excellent level of service (Mesmer Street/Centinela Avenue would operate at LOS A in both peak hours and Bluff Creek Drive/Centinela would operate at LOS A and B in the A.M. and P.M. peak respectively). At Bluff Creek Drive/Campus Center Drive intersection, the level of service would decrease from LOS A to LOS B, however the intersection would continue to operate at an acceptable level of service. Finally, at Inglewood Boulevard/Centinela Avenue, the volume to capacity ratio would improve in the A.M. peak and remain the same in the P.M. peak hour. There are no significant impacts resulting from the additional mitigation measure and, as discussed above, this mitigation measure would eliminate the one remaining significant impact discussed in Subsection 5.1.2, above.

The level of service and volume to capacity ratio would not change for any other intersections as a result of the new mitigation measure. In summary, the mitigation measure provides an improved balance of traffic distribution by allowing Bluff Creek Drive, which has excess capacity, to relieve some of the excess traffic on the parallel Jefferson Boulevard. With addition of this mitigation measure to the mitigation program, the Proposed Project will not have any significant impacts after mitigation.”

- 15.q** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 931. Add the following discussion to the end of Subsection 5.2, Impacts on Freeway Capacity – After Mitigation:

“Under the alternative no Playa Vista Drive bridge and road 2010 Baseline Scenario, the project impacts on the freeway system would be the same as shown in Tables 122 and 123 on pages 870 and 871. While there would be some change in traffic at roadway intersections as a result of the deletion of the Playa Vista Drive bridge and road compared to the with Playa Vista Drive bridge and road scenario, as shown in Table 9-4 of Appendix K-2 of the Draft EIR, the number of project trips assigned to the freeway system does not change under either scenario, and freeway operating conditions would be the same. Further, the additional mitigation measure at Campus Center Drive does not affect this conclusion. Therefore there would be no difference in project impacts on the freeway system under either baseline scenario.”

- 15.r** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 932. Add the following discussion to the end of Subsection 5.3, Impacts on Neighborhood Streets – After Mitigation:

“The assignment of project trips is the same under either the 2010 Playa Vista Drive bridge and road scenario or the 2010 No Playa Vista Drive bridge and road scenario. Under the no Playa Vista Drive bridge and road scenario, with the additional mitigation measure at Campus Center Drive, no new or different intersections would operate at Level of Service F. The corridors with more than 120 trips and intersections operating at LOS F would be the same as shown in Figure 75 (page 874) as a result of the elimination of the Playa Vista Drive bridge. Thus, there would be no additional diversion of trips through local residential streets.”

- 15.s** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 932. Add the following discussion to the end of Subsection 5.4, Impacts on Project Access – After Mitigation:

“All of the project access points would operate at acceptable Levels of Service under the No Playa Vista Drive bridge and road scenario. Under the no Playa Vista Drive bridge and road scenario, intersection operations would be as follows: Jefferson Boulevard/Centinel Avenue would operate at LOS D (fair service) in both the A.M. and P.M. peak. Jefferson Boulevard/Alla Road would operate at LOS C (good service) in the A.M. and LOS A in the P.M. peak. Bluff Creek Drive/Campus Center Drive and Jefferson Boulevard/Westlawn Avenue would operate at LOS B (excellent service) in both the A.M. and P.M. peak. Bluff Creek Drive/Playa Vista Drive would operate at LOS A (excellent service) in the A.M. and LOS B in the P.M. peak. Jefferson Boulevard/

---

McConnell Avenue and Bluff Creek Drive/McConnell Avenue would operate at LOS A in both the A.M. and P.M. peak hour. No project access point would operate at Level of Service E or F (poor/failure service). Therefore, under either baseline scenario (with or without Playa Vista Drive Bridge), the Proposed Project would not have a significant impact on access after mitigation.”

- 15.t** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 934. Add the following discussion to the end of Subsection 5.5, Impacts on Public Transit – After Mitigation:

“Under the No Playa Vista Drive bridge and road 2010 Baseline Scenario, the project impacts on the public transit system would be the same as shown in Table 126 on page 881. The number of project trips assigned to the transit system does not change under the Alternative 2010 Baseline Scenario and therefore there would be no difference in project impacts on the transit system.”

- 15.u** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, page 935. Add the following discussion to the end of Subsection 5.6, Construction-Related Impacts – After Mitigation:

“The construction-related conclusions would be the same under the No Playa Vista Drive bridge and road 2010 Baseline Scenario with the new mitigation measure. While there is a limited amount of shifting at intersections adjacent to the Proposed Project site, the same roadways would be affected by construction impacts under either baseline scenario. Further, any intersections operating at LOS E or F under the Playa Vista Drive Bridge 2010 Baseline would operate at the same or better level of service under the No Playa Vista Drive bridge and road scenario with the new mitigation measure.”

- 15.v** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, pages 891-892, Table 129. Replace table with the following:

**Table 129**

**VILLAGE AT PLAYA VISTA  
DRAFT MITIGATION SUBPHASING PLAN <sup>a</sup>**

<b>Subphase <sup>b</sup></b>	<b>P.M. Peak-Hour Trips per Subphase <sup>b</sup></b>	<b>Transportation System Improvements <sup>c, d, e, f</sup></b>	<b>Jurisdiction</b>
Village Subphase 1	575	1. Provide funding for 1 bus for Culver City Bus Line 6 (CC6)	Culver City
		2. Provide funding for 1 bus for Culver City Bus Line 2 (CC2)	Culver City
		3. Provide funding for Airport System ATCS	City of Los Angeles
		4. Provide funding for Transit Priority System (TPS) on Lincoln Corridor	City of LA/Caltrans
		5. Signal improvement (phasing) at Lincoln Bl/83rd St	City of LA/Caltrans
		6. Provide funding for neighborhood traffic management	City of Los Angeles
Village Subphase 2	575 (1,150 cumulative)	1. Provide funding for 2 buses for CC4 (includes extension to Playa Del Rey)	Culver City
		2. Physical and/or operational improvements at:	
		2a. Centinela Av/Venice Bl	City of LA/Caltrans
		2b. Green Valley Circle/Centinela Avenue	Culver City
		2c. La Tijera Bl/Centinela Av	City of Los Angeles
		2d. Overland Av/Culver Bl	Culver City
		2e. Sawtelle Bl/Culver Bl	Culver City
		3. Provide funding for signal improvement at Aviation Bl/Florence Av/Manchester Av	City of Inglewood
		4. Project component – Jefferson Boulevard corridor improvement (between Beethoven Av to Centinela Av) <sup>g</sup>	City of Los Angeles
		5. Project component – complete Bluff Creek Dr corridor improvement (Dawn Creek to Westlawn) <sup>g</sup>	City of Los Angeles
6. Campus Center Drive between Millennium and Bluff Creek Drive – Public Access	City of Los Angeles		
Village Subphase 3	575 (1,725 cumulative)	1. Provide funding for Smart Corridor System ATCS	City of Los Angeles
		2. Extension of internal shuttle to off-site locations	LA/Culver City/LA County
		3. Physical and/or operational improvements at:	
		3a. Centinela Av/Culver Bl	City of Los Angeles
		3b. Centinela Av/Washington Pl	Culver City
		3c. La Brea Av/Centinela Av	City of Inglewood
		3d. Palawan Way/Admiralty Way	Los Angeles County

**Table 129 (Continued)**

**VILLAGE AT PLAYA VISTA  
DRAFT MITIGATION SUBPHASING PLAN**

<b>Subphase<sup>b</sup></b>	<b>P.M. Peak-Hour Trips per Subphase<sup>b</sup></b>	<b>Transportation System Improvements<sup>c, d, e, f</sup></b>	<b>Jurisdiction</b>
Village Subphase 4	575 (2,300 cumulative)	1. Provide funding for 2 buses for CC6 Limited 2. Operational improvement at I-405 NB Ramps/Jefferson Bl 3. Centinela Avenue corridor improvement (Culver to SR-90)	Culver City Culver City/Caltrans City of Los Angeles

<sup>a</sup> The subphasing plan may be revised, where appropriate and as determined by LADOT: (1) upon demonstration that measures for each subphase in the revised subphasing plan are equivalent or superior to the original mitigation measures; and/or (2) upon demonstration that approval or implementation of measures has been delayed, provided that the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<sup>b</sup> P.M. peak-hour trip generation for each subphase would determine the specific traffic improvements shown. P.M. peak-hour trip generation to be estimated as subphases develop using the following factors:

Dwelling Units – 0.54 trip per unit

Office – 1.74 trips per 1,000 sf

Retail – 3.83 trips per 1,000 sf (includes pass-by reduction)

Community Serving Uses – 0.45 trip per 1,000 sf (includes internal capture reduction)

<sup>c</sup> Prior to the issuance of any building permit for each subphase, all on- and off-site mitigation measures for the subphase shall be complete or suitably guaranteed satisfactory to LADOT.

<sup>d</sup> Temporary Certificates of Occupancy may be granted in the event of any delay through no fault of the Applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<sup>e</sup> Substitute mitigation measures may be provided subject to approval by the agency with jurisdiction over the location of the measure, upon demonstration that the substitute measure is equivalent or superior to the original mitigation measure.

<sup>f</sup> Prior to the issuance of the final Certificate of Occupancy in the final subphase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT.

<sup>g</sup> The Jefferson Boulevard and Bluff Creek Drive corridors are components of the Proposed Project. Neither improvement serves to mitigate any Project impact; they are included in this table to establish timing for completion.

- 15.w** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 939. Insert the following at end of the first paragraph of the Subsection:

“Table 9-3 in Section II.37, Corrections and Additions to the Final EIR presents the same information for the 2010 Baseline Scenario without Playa Vista Drive bridge and road. The trip generation under either baseline scenario is the same. The conclusions discussed below are the same under both baseline scenarios with and without Playa Vista Drive bridge and road for the Proposed Project or Equivalency Program.”

- 15.x** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 939. Insert the following after the second paragraph of the Subsection:

“Under the 2010 Baseline without the Playa Vista Drive bridge and road, direct Proposed Project or Equivalency Program impacts exceeding the LADOT threshold have been projected at the same intersection. However, one additional P.M. peak hour exceedance is projected prior to mitigation. There would be no impacts at CMP freeway monitoring locations under either baseline scenario.

- 15.y** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 940. Insert the following at the end of the third full paragraph:

“The intersection analysis presented in Table 9-2 beginning on page IX-3 of Appendix K-2 and Table 9-3 of Section II.37, Corrections and Additions to the Final EIR, shows that under the No Playa Vista Drive bridge and road 2010 future baseline with the Proposed Project, 92 intersections are projected to operate at LOS E or F in the A.M. peak hour and 108 would operate at LOS E or F in the P.M. peak hours.”

- 15.z** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 941. Insert the following at the end of the second full paragraph:

“These conclusions are the same under either baseline scenario. However, an additional mitigation measure has been added that would require full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium, as described in Section II.15, Corrections and Additions to the Final EIR. Under the 2010 No Playa Vista Drive bridge and road scenario, with implementation of the proposed improvement measures the number of intersections operating at LOS E or F would be reduced to 84 and 102 during the A.M. and P.M. peak hours, respectively.”



- 15.aa** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 941. Replace the first sentence of the third paragraph with the following:

“In conclusion, Proposed Project impacts at locations where the magnitude of the impacts exceed the LADOT or L.A. County CMP significance criteria are alleviated by the Project’s mitigation program, resulting in system-wide performance that is estimated to be better with the Proposed Project and its mitigation measures under both future baseline conditions (with and without the Playa Vista Drive bridge and road) than under cumulative conditions without the Project.”

- 15.bb** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 941. Replace the last sentence of the third paragraph with the following:

“This conclusion applies to the Proposed Project inclusive of the Equivalency Program and the construction of the Project’s off-site improvements under the future baseline conditions, with and without the Playa Vista Drive bridge and road.”

- 15.cc** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 942. Replace the last sentence of the first paragraph with the following:

“Nonetheless, since the Proposed Project’s impacts from construction, inclusive of the Equivalency Program and the off-site improvements, have been identified as potentially significant and short-term impacts, cumulative impacts from construction are considered to be temporary, short-term, potentially significant impacts.”

- 15.dd** Volume I, Book 2, Section IV.K.(1), Traffic and Circulation, Subsection 6.0, Cumulative Impacts, page 942. Add the following after the last sentence on the page:

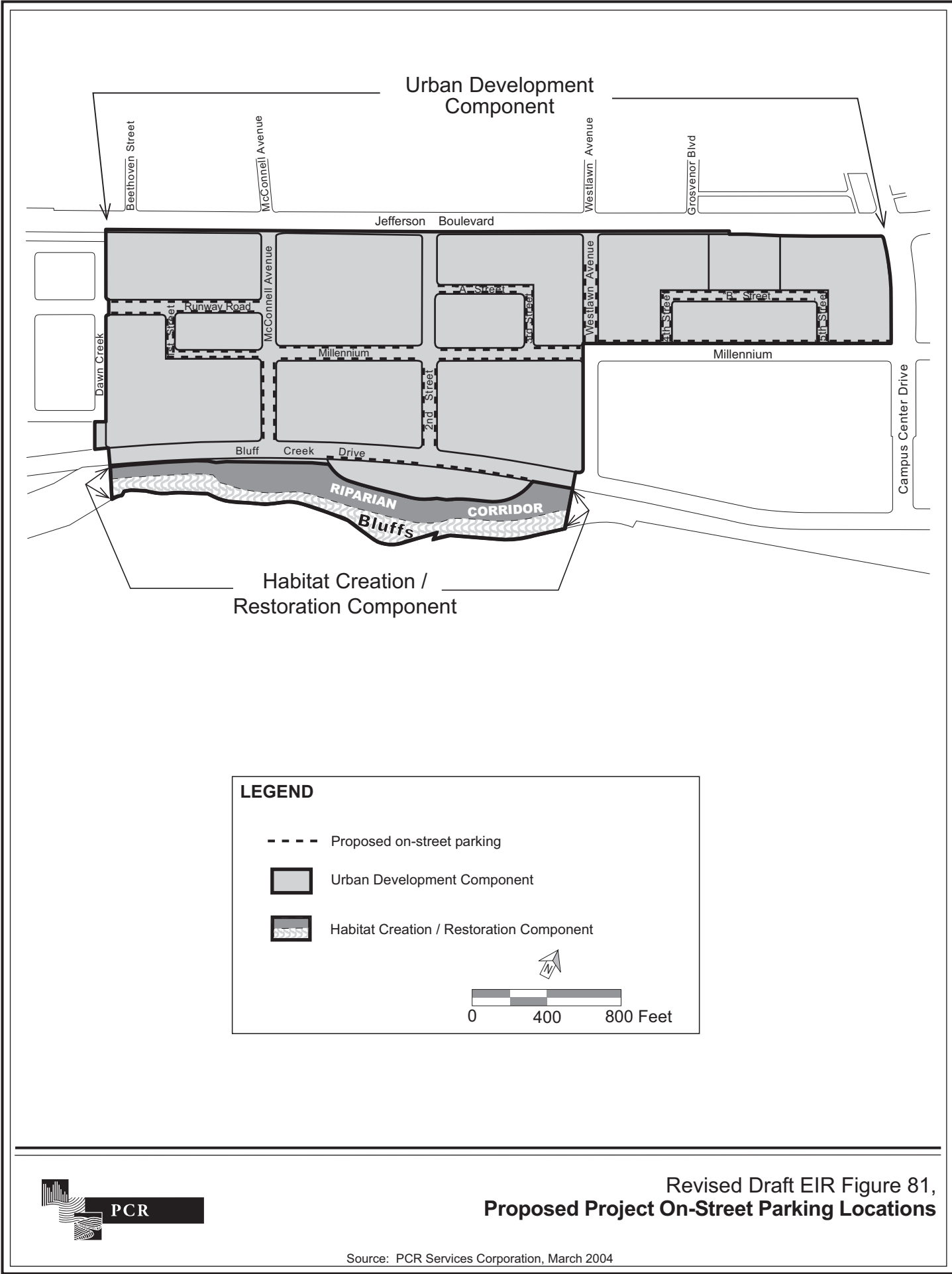
“These conclusions relative to access impacts being not significant, and construction impacts being temporary short-term potentially significant, are applicable to the baseline conditions without the Playa Vista Drive bridge and road Proposed Project or Equivalency Program scenario, as well.”

---

**II. CORRECTIONS AND ADDITIONS**  
**16. PARKING**

---

- 16.a** Volume I, Book 2, Section IV.K.(2), Parking, Figure 81, page 946. Replace the figure with the revised Figure 81 as shown on page 232.



Revised Draft EIR Figure 81,  
Proposed Project On-Street Parking Locations

Source: PCR Services Corporation, March 2004

---

## II. CORRECTIONS AND ADDITIONS

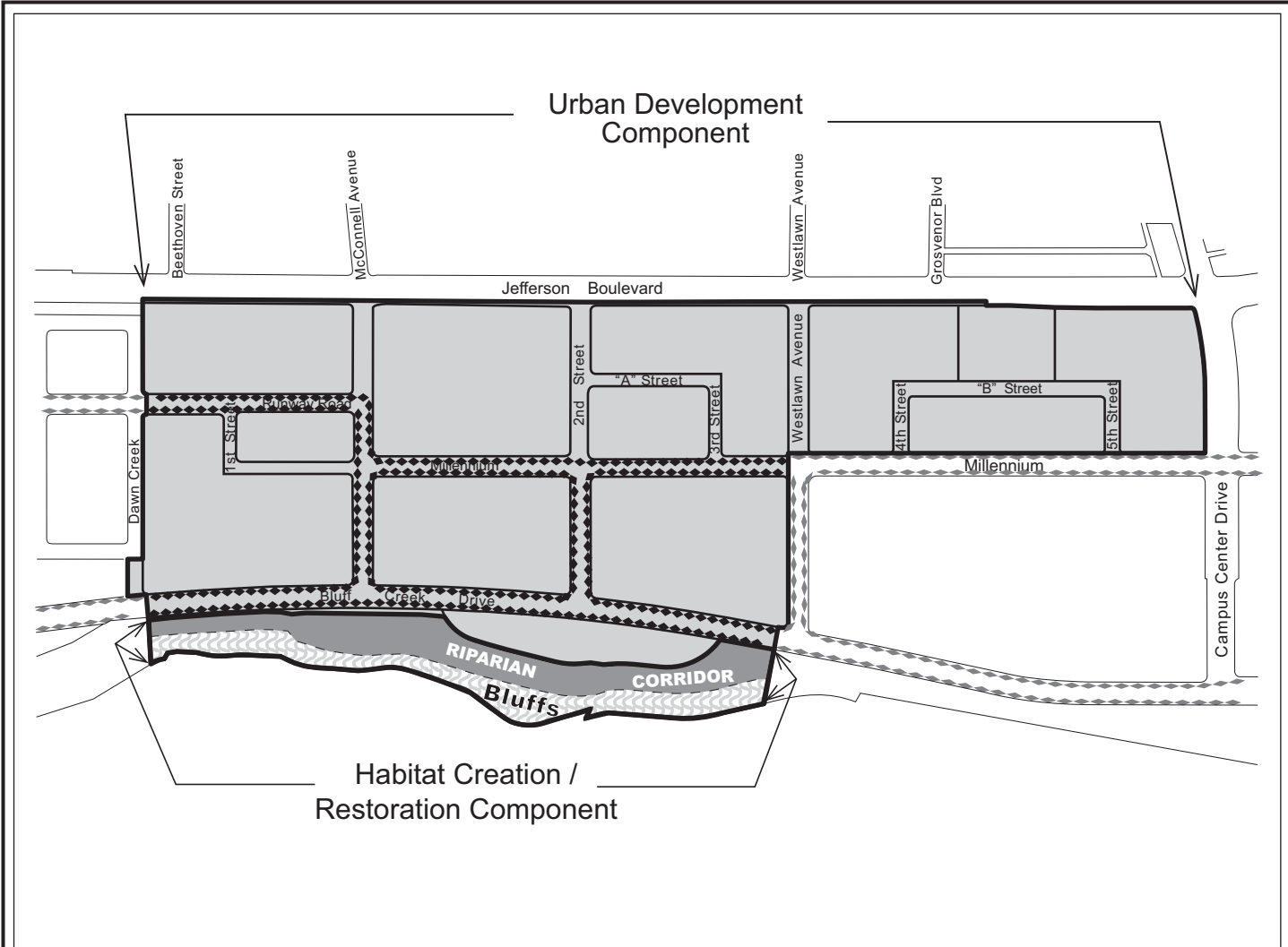
### 17. BICYCLE PLAN

---

- 17.a** Volume I, Book 2, Section IV.K.(3), Bicycle Plan, Subsection 3.3, Project Design Features, page 960, second paragraph, second sentence. Replace with the following:

“The bicycle lanes would be located along Bluff Creek Drive and Runway Road, and portions of McConnell Avenue, 2nd Street, and Millennium.”

- 17.b** Volume I, Book 2, Section IV.K.(3), Bicycle Plan, Figure 84, page 962. Replace the figure with the revised Figure 84 as shown on page 234.



**LEGEND**

- ◆◆◆◆◆◆◆◆◆◆ Proposed Project  
Class II Bikeway Bicycle Lane-(Active Open Space) (1.0 acres)
- Playas Vista First Phase Project  
Class II Bikeway Bicycle Lane
- Urban Development Component
- ▨ Habitat Creation / Restoration Component

0 400 800 Feet



Revised Draft EIR Figure 84,  
Proposed Bikeways Locations

Source: PCR Services Corporation, March 2004

---

## II. CORRECTIONS AND ADDITIONS

### 18. FIRE PROTECTION

---

**18.a** Volume I, Book 3, Section IV.L.(1), Fire Protection, Figure 85, page 968, and Figure 87, page 977. Replace the figures with the revised Figure 85 as shown on page 236 and the revised Figure 87 as shown on page 237, which reflect the new locations for Fire Station 62 and Fire Station 5. The revised Figure 87 also includes corrections to the locations of the intersections operating at LOS E and F.

**18.b** Volume I, Book 3, Section IV.L.(1), page 972, Fire Protection, third paragraph, second sentence. Replace with the following:

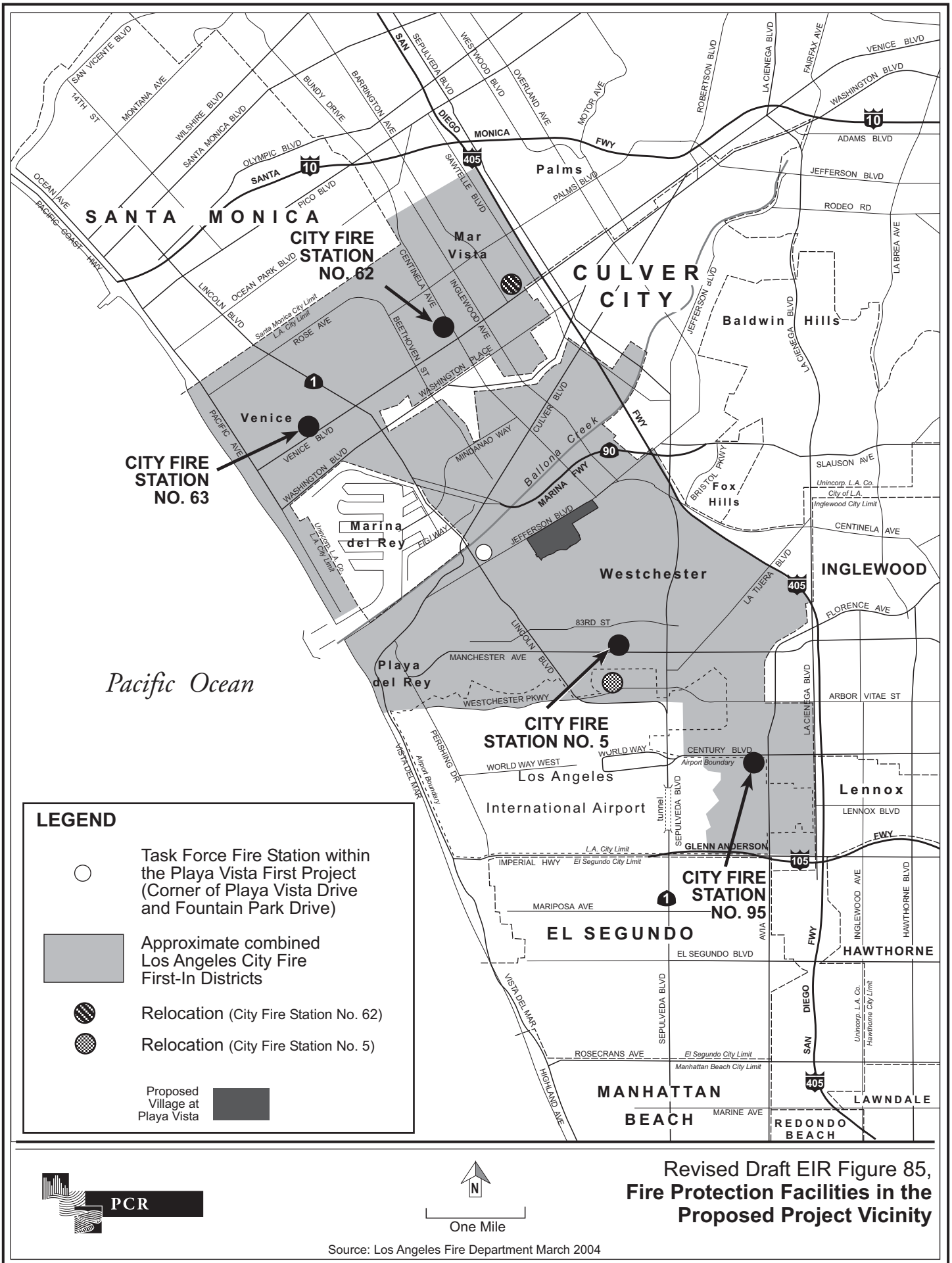
“Fire Station 62 will be located at 11970 W. Venice Boulevard. Fire Station 5 will be located at 8900 Emerson Avenue. Currently, both stations are 25 percent complete. (Los Angeles 2000 Prop F Fire Facilities Bond Progress Report, December 2003.) The expected completion dates are 2006. (Los Angeles City Department of Public Works, Bureau of Engineering Proposition F website, [http://eng.lacity.org/projects/fire\\_bond/project\\_window.htm](http://eng.lacity.org/projects/fire_bond/project_window.htm).)”

**18.c** Volume I, Book 3, Section IV.L.(1), page 976, top paragraph. Replace the second sentence with the following:

As indicated in Figure 87, with implementation of the Proposed Project and its traffic mitigation measures, in 2010 there will be 1 intersection within the service area that is operating at LOS E or F in the A.M. peak hour, 13 intersections that will be operating at LOS E or F in the P.M. peak hour, and 17 intersections that will be operating at LOS E or F in both the A.M. and P.M. peak hours. The number is the same under either baseline scenario (i.e., with or without Playa Vista Drive bridge and road), and additional mitigation measure.

**87.d** Volume I, Book 3, Section IV.L.(1), page 983, paragraph on Emergency Access. Add the following after the fourth sentence:

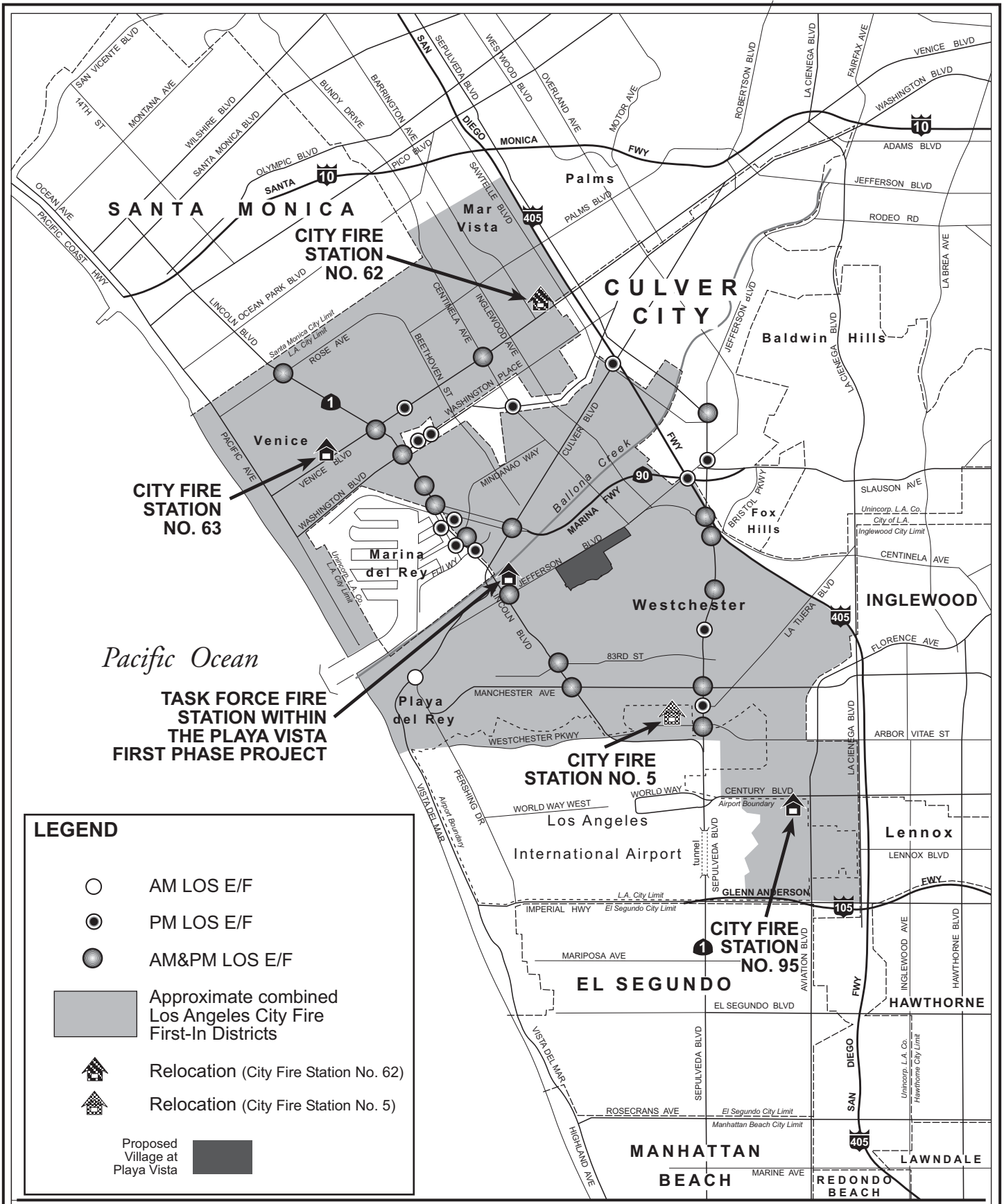
“Under the 2010 Scenario with no Playa Vista Drive bridge and road, and the additional mitigation measure, the number of intersections in the service district operating at LOS E or F under the 2010 Baseline Conditions is 86 intersections during the A.M. peak hour and 103 intersections during the P.M.



Revised Draft EIR Figure 85,  
**Fire Protection Facilities in the  
 Proposed Project Vicinity**



Source: Los Angeles Fire Department March 2004



Revised Draft EIR Figure 87,  
**LOS E and F Intersections in the  
 Service Area - 2010 with  
 Project and Mitigation Measures**

Source: Los Angeles Fire Department, March 2004



peak hour. With the Proposed Project and Mitigation the numbers are 84 (less 2) and 102 (less 1) for the A.M. and P.M. peak hours, respectively.

- 18.e** Volume I, Book 3, Section IV.L.(1), page 984, Fire Protection, top of page, last sentence of paragraph. Replace with the following:

“Fire Station 62 will be located at 11970 W. Venice Boulevard. Fire Station 5 will be located at 8900 Emerson Avenue. (Los Angeles 2000 Prop F Fire Facilities Bond Progress Report, December 2003.)”

---

**II. CORRECTIONS AND ADDITIONS**  
**19. POLICE PROTECTION**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**20. SCHOOLS**

---

**20.a** Volume I, Book 3, Section IV.L.(3), Schools, Subsection 2.2.2.2, Classroom Size, page 999. Add at the end of this one paragraph discussion:

“With regard to classroom size as it relates to State funding, the LAUSD has a long-range facilities goal for a return to smaller class sizes in grades 4-12.”

---

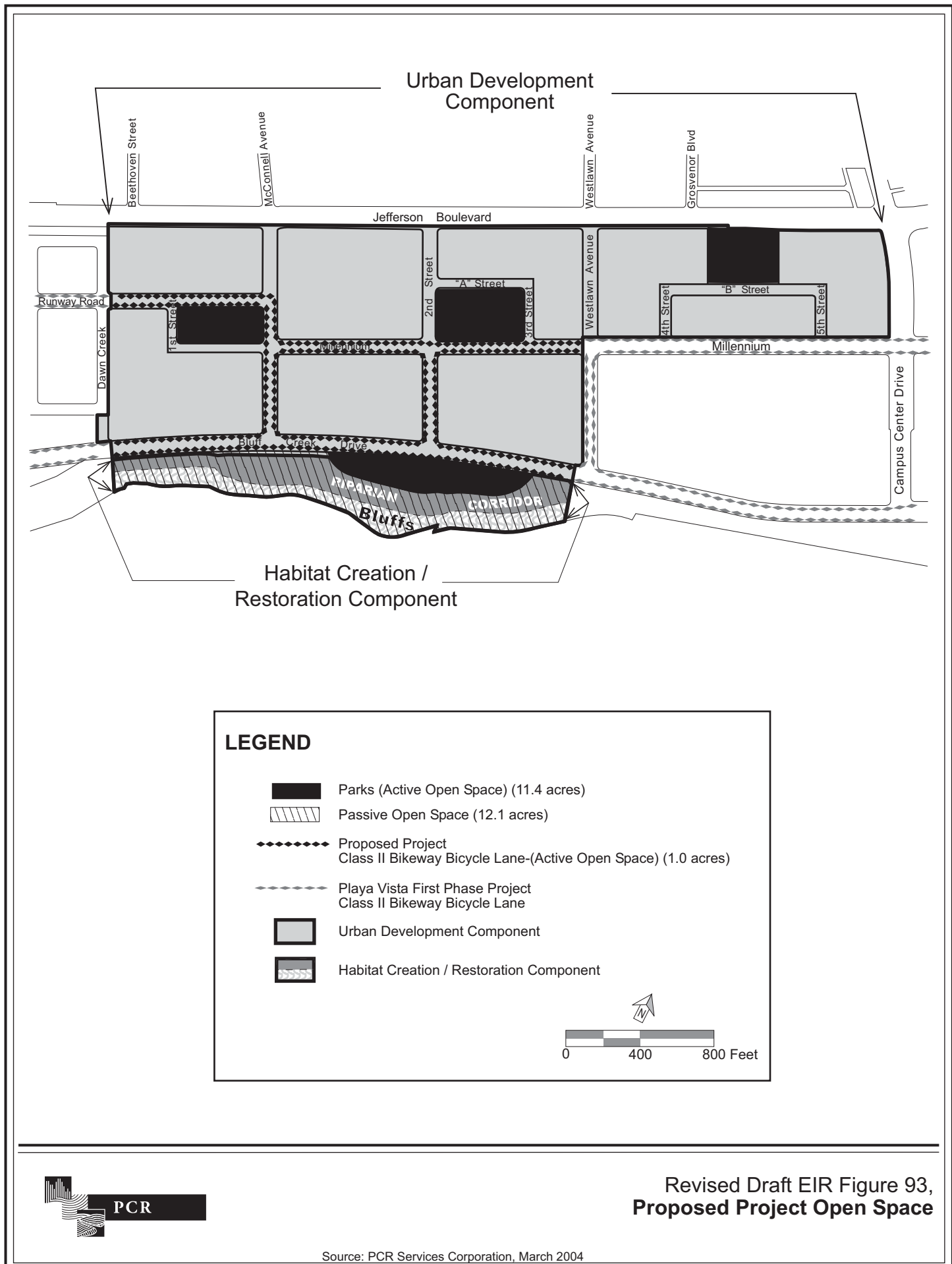
**II. CORRECTIONS AND ADDITIONS**  
**21. PARKS AND RECREATION**

---

**21.a** Volume I, Book 3, Section IV.L.(4), Parks and Recreation, Figure 93, page 1032, Replace the figure with the revised Figure 93 as shown on on page 242.

**21.b** Volume I, Book 2, Section IV.L.(4), Parks and Recreation, page 1040. In the second full bullet, revise the second sentence to read:

“If the Department of Recreation and Parks does not accept dedication of the park areas, a property owners’ association shall be formed to maintain the park and recreational facilities in a manner satisfactory to the City of Los Angeles, together with provision for public access to the parks, and the appropriate trails and easements guaranteed to the City.”



Source: PCR Services Corporation, March 2004

---

**II. CORRECTIONS AND ADDITIONS**  
**22. LIBRARIES**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**23. ENERGY**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**24. WATER CONSUMPTION**

---

There are no corrections and additions to this section of the Draft EIR.



---

**II. CORRECTIONS AND ADDITIONS**  
**25. WASTEWATER**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**26. SOLID WASTE**

---

- 26.a** Volume I, Book 3, Section IV.N.(3), Solid Waste, page 1143. Replace the parenthetical in the third line of the page to read: “(i.e., a 0.07 percent increase in overall disposal at the four City-serving landfills).”

---

## II. CORRECTIONS AND ADDITIONS

### 27. VISUAL QUALITIES (AESTHETICS AND VIEWS)

---

**27.a** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 98, page 1151. Replace the figure with the revised Figure 98 as shown on page 249.

**27.b** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 99, page 1152. Replace the figure with the revised Figure 99 as shown on page 250.

**27.c** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 100, page 1153. Replace the figure with the revised Figure 100 as shown on page 251.

**27.d** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 101, page 1158. Replace the figure with the revised Figure 101 as shown on page 252.

**27.e** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), page 1159, last paragraph in Subsection 2.2.4.2. Add to the paragraph:

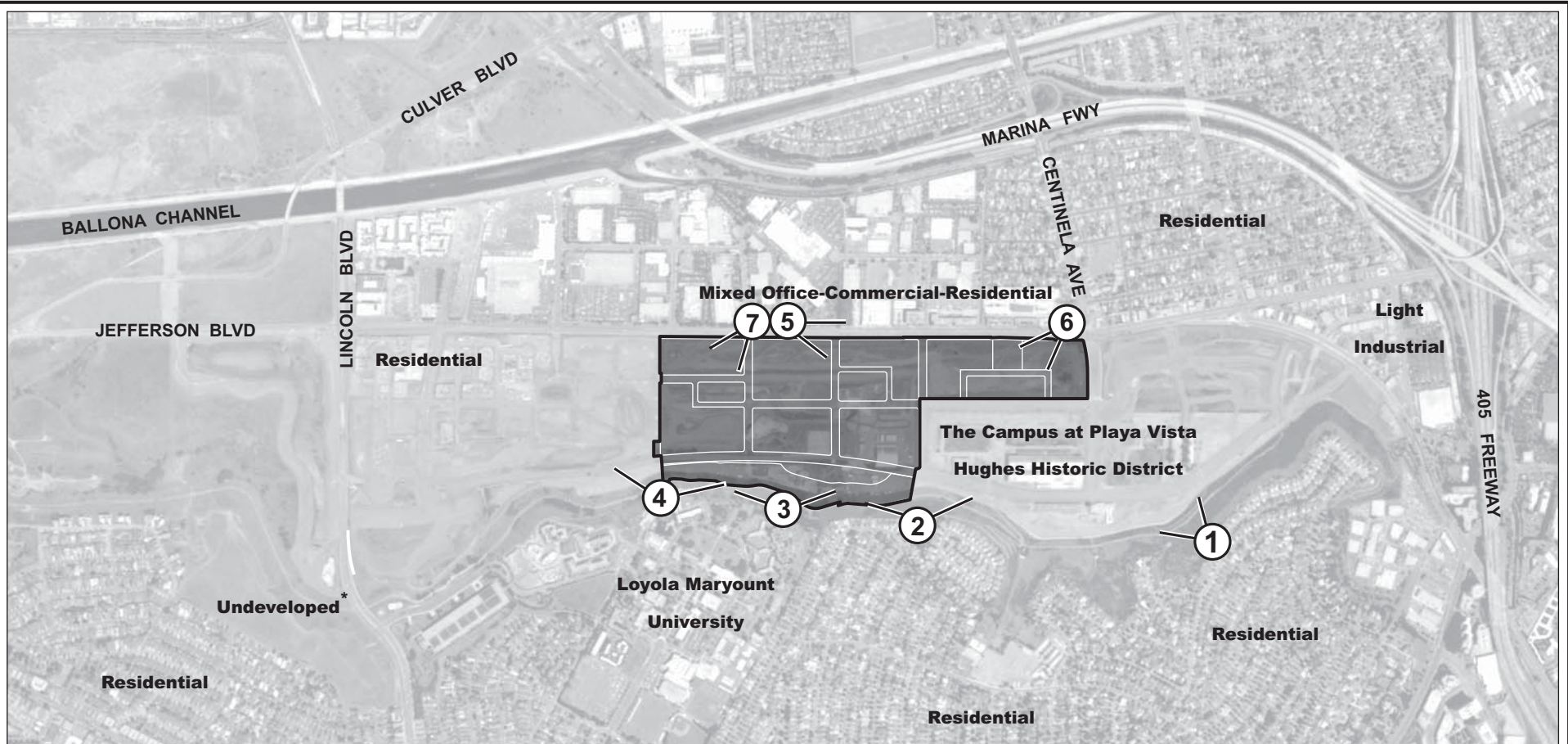
“Notwithstanding, there are some development locations at further distance from the Project site, and higher elevations that have larger views of the bluffs.”

**27.f** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), page 1159, last paragraph on the page. Add to the last paragraph:

“In addition to views from these roadways, there is a potential for views of/over the Project site to be present from spot locations in the larger basin; e.g., the view from Grandview Boulevard, just south of Palms Boulevard as one example.”

**27.g** Volume I, Book 3, IV.O, Visual Qualities (Aesthetics and Views), page 1165, second and third bullets. Replace the second and third bullets with the following:

- Commercial and Mixed Use Lots: The maximum lot coverage would be 70%; and
- Park Sites: The maximum lot coverage would be 15% (for recreational and park support structures).



\* Related Project No. 24 - Proposed 120 Residential Units

**LEGEND**

Photo View Area



Photo Number

(Photo Locations for figure 99 & 100)

Proposed Village at Playa Vista



Revised Draft EIR Figure 98,  
Surrounding Land Uses  
and View Locations

Photo 1

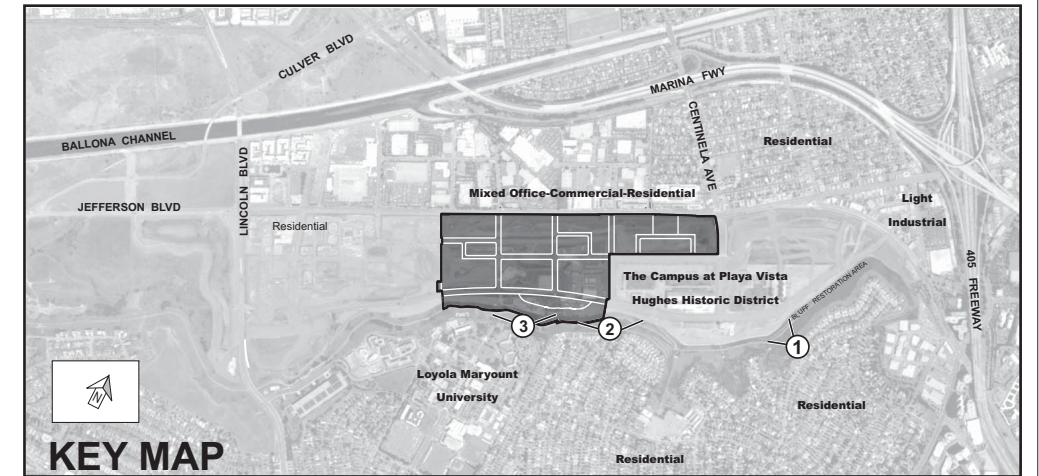


Photo 2

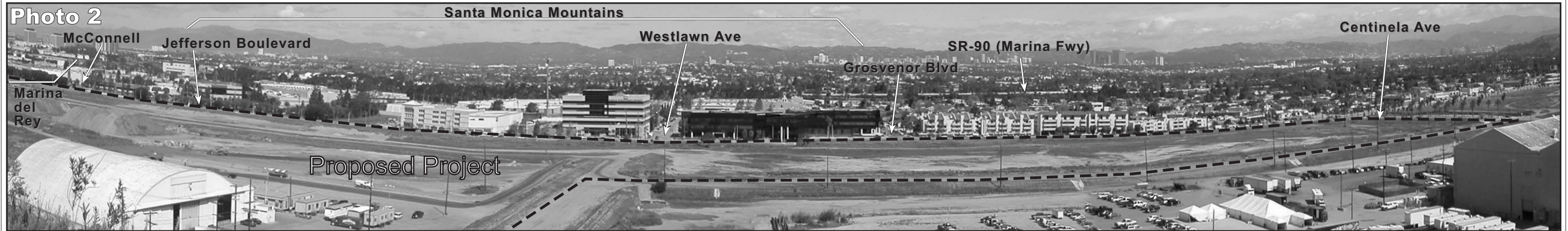


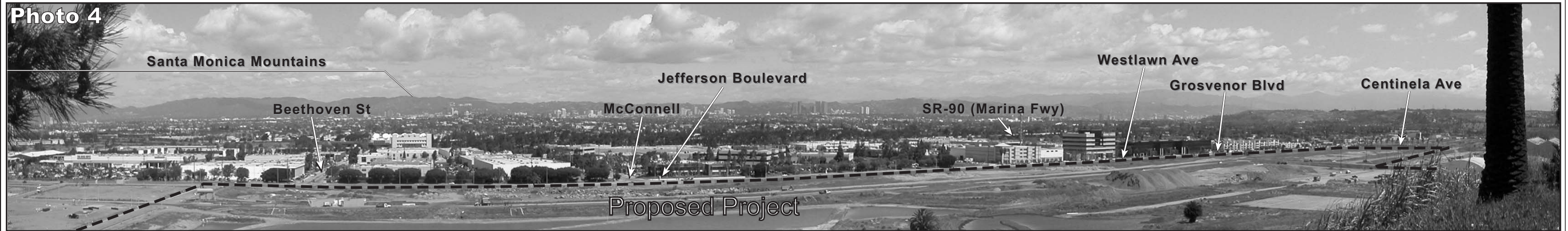
Photo 3



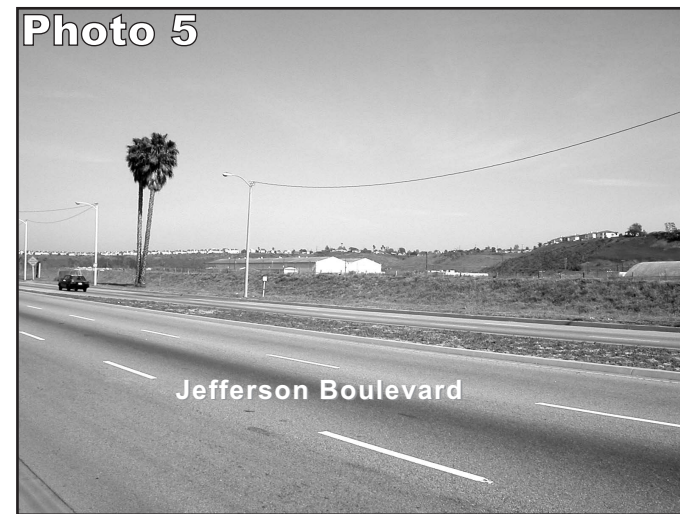
Revised Draft EIR Figure 99,  
 Photographs: Existing Views From the  
 Westchester Bluffs

SOURCE: PCR Services Corporation, March 2004

**Photo 4**



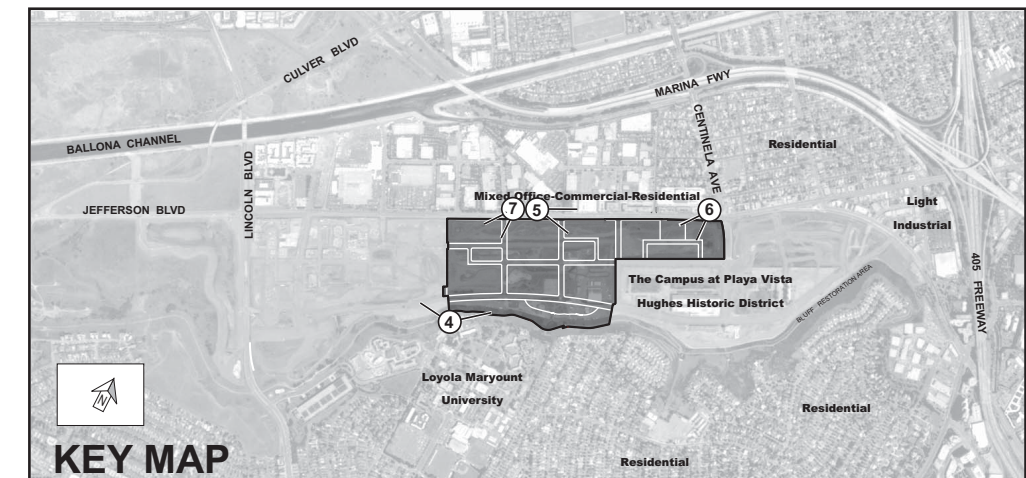
**Photo 5**

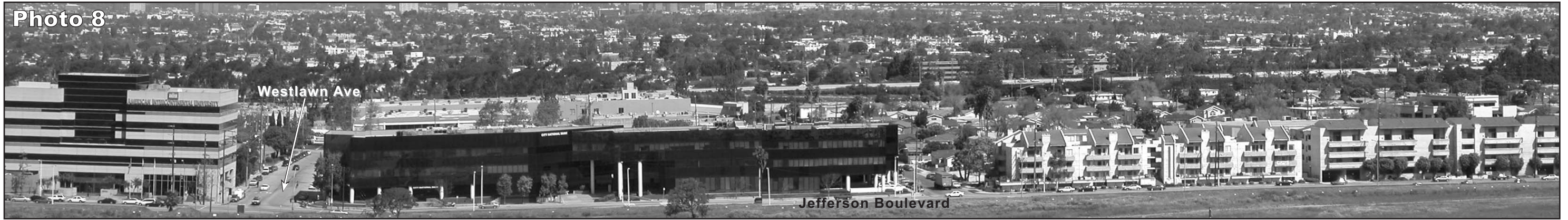


**Photo 6**



**Photo 7**

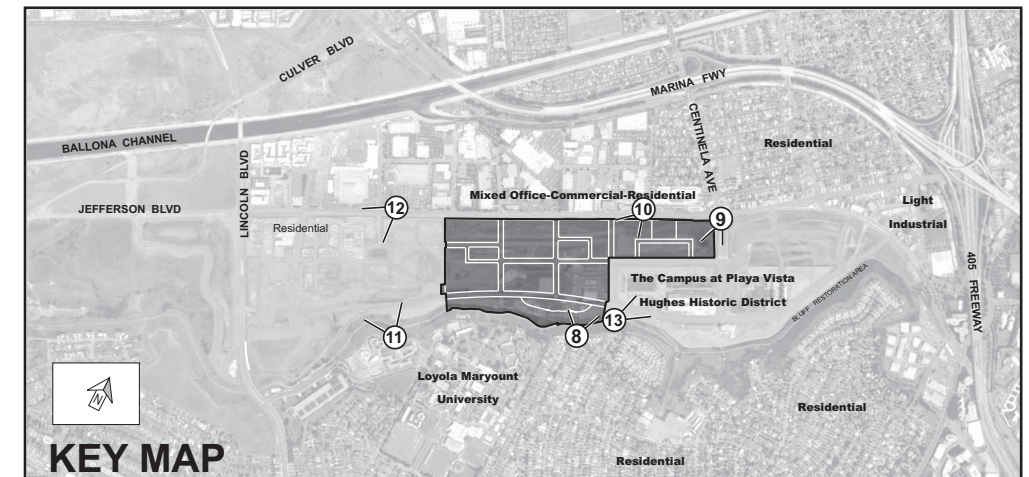
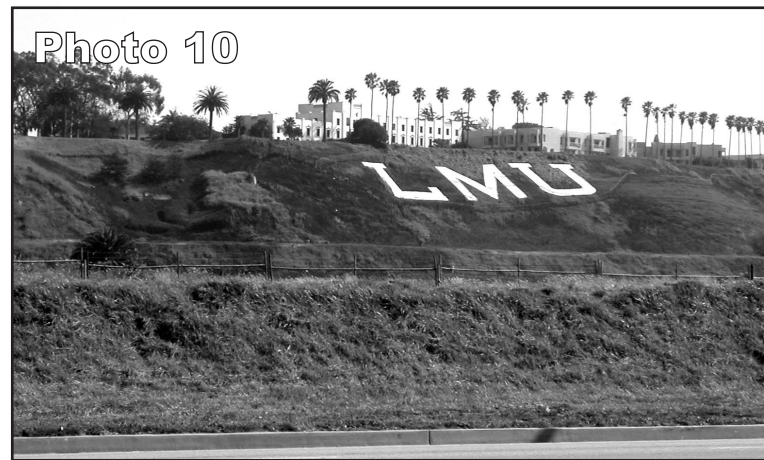




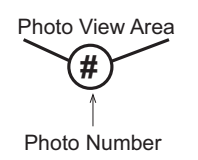
**NORTH:** Jefferson Boulevard - Mixed Use



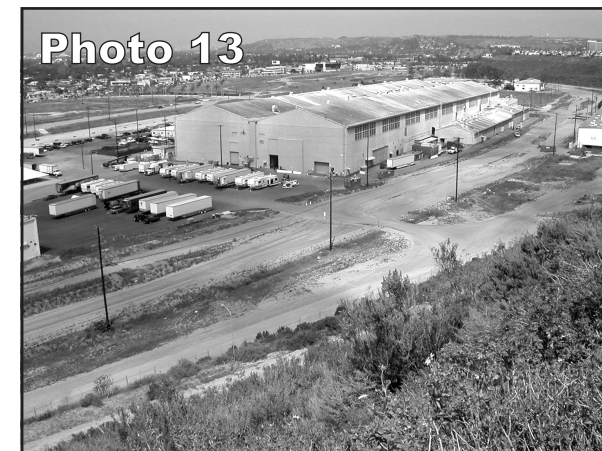
**SOUTH:** Top of Bluff - Residential; LMU



**KEY MAP**



**WEST:** Adjacent Playa Vista First Phase: Mixed Use



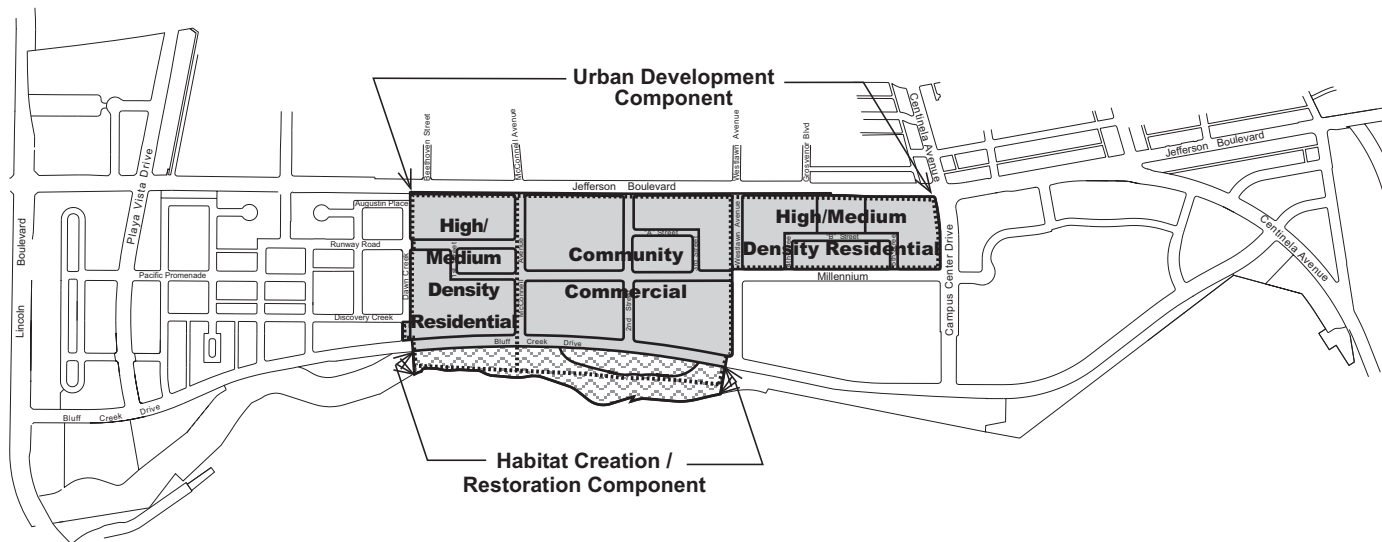
**EAST:** Adjacent Playa Vista First Phase: Former Plant Site.



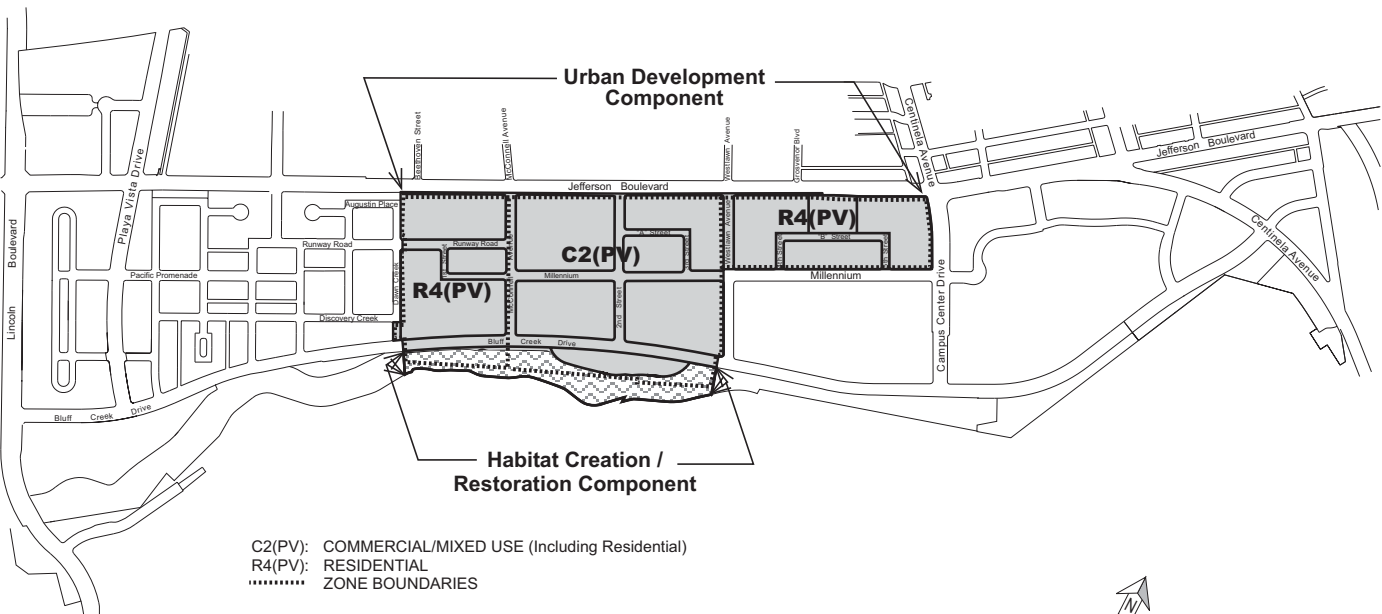
- 27.h** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 102, page 1166. Replace the figure with the revised Figure 102 as shown on page 254.
- 27.i** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 103, page 1168. Replace the figure with the revised Figure 103 as shown on page 255.
- 27.j** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Table 182, page 1170. Replace the table with the revised Table 182 as shown on page 256.
- 27.k** Volume I, Book 3, Section IV.O, Visual Qualities (Aesthetics and Views), Figure 104, 1173. Replace the figure with the revised Figure 104 as shown on page 257.
- 27.l** Volume I, Book 3, Section IV.O, Visual Qualities, Subsection 4.0, Mitigation Measures, page 1182. Replace the second mitigation measure bullet with the following:
- “All rooftop structures (including mechanical equipment), garbage dumpsters, and other unsightly equipment, shall not be visible from the adjoining street.”



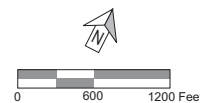
## Proposed General Plan Designations



## Proposed Specific Plan/Zoning Designations

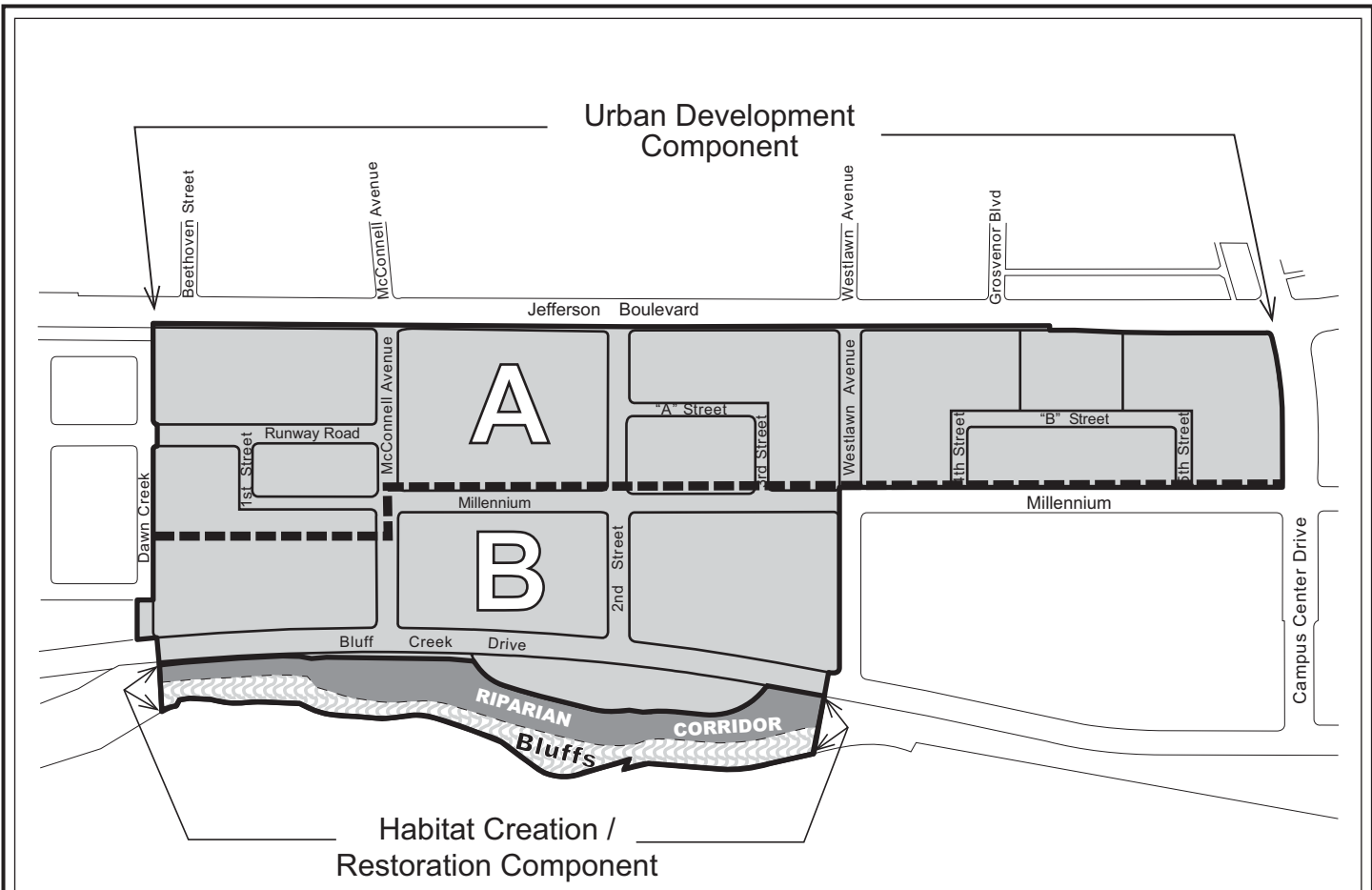


**NOTE:**  
 Locations of roadways and land use boundaries are approximate.  
 Precise placement will be determined as part of subdivision process.



Revised Draft EIR Figure 102,  
**Proposed Plan Amendments**



Source: Playa Capital Company, March 2004





**LEGEND**

Height District	Above Mean Sea Level (AMSL)	Above Finished Grade <sup>a</sup>	Above Existing Grade <sup>a</sup>
<b>A</b>	95'	68' - 72'	71' - 88'
<b>B</b>	112'	85'-89'	88'-105'

<sup>a</sup> Height above finished grade and above existing grade are approximate. Finished grades will be approximately 23' to 27' AMSL. Existing grades vary from approximately 7' to 24' AMSL. Westchester Bluffs: Approximately 140' AMSL

 Urban Development Component  
 Habitat Creation / Restoration Component

  
  
 0      400      800 Feet

Revised Draft EIR Figure 103,  
**Proposed Height Limits**



Source: PCR Services Corporation, March 2004

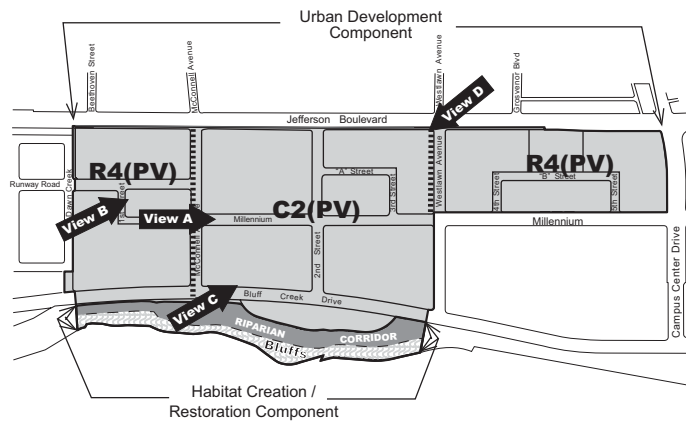
**Table 182**

**REVISED DRAFT EIR TABLE 182, PROPOSED SETBACK REQUIREMENTS**

<u>Location</u>	<u>Required Setback</u>	
<u>Thoroughfares</u>		
Jefferson Boulevard	15 Feet	(From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet	
Runway Road (Dawn Creek to McConnell)	15 Feet	(Residential Development will characterize this block)
Millennium Road between 1st Street and McConnell	10 Feet	
Millennium Road (McConnell to 2nd Street)	0-5 Feet	(Street front retail/live-work residential will characterize this block.)
Millennium Road (Between 2nd Street and Campus Center Drive)	15 Feet	
McConnell Avenue	10 Feet	
McConnell Avenue (400 feet north of Millennium along the east side of the block)	0-5 Feet	(Street front retail will characterize this block.)
Westlawn Avenue	10 Feet	
Campus Center Drive	15 Feet	
1st, 2nd, 3rd, 4th, and 5th Street	10 Feet	
2nd Street (400 feet north of Millennium along the west side of the block)	0-5 Feet	(Street front retail will characterize this block.)
A and B Streets	10 Feet	
Dawn Creek	10 Feet	
<u>Setbacks from Adjacent Lots</u> <sup>a</sup>		
Adjacent to a Residential or Commercial Lot	10 Feet	
Adjacent to a Park or Open Space Lot	5 Feet	

<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

Source: Playa Capital Company, 2004.

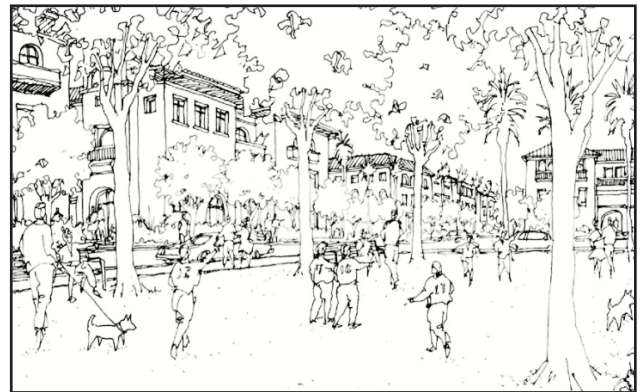


**LEGEND**

**C2 (PV)** Commercial/Mixed Use  
**R4 (PV)** Residential  
 Zone Boundaries



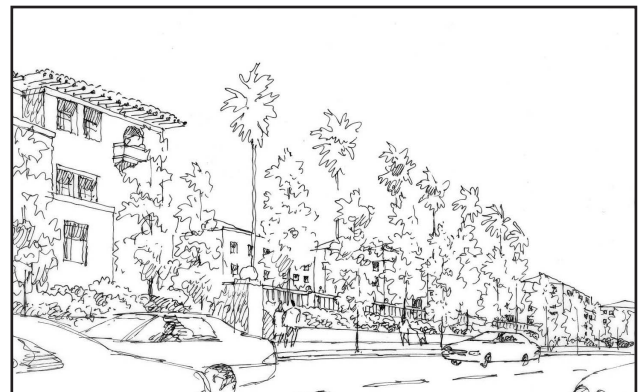
**View A: Millennium**



**View B: Park**



**View C: Bluff Creek Drive**



**View D: Jefferson Boulevard**



**Revised Draft EIR Figure 104,  
 Representative Illustrations  
 of Project Appearance**

Source: PCR Services Corporation, March 2004

---

**II. CORRECTIONS AND ADDITIONS**  
**28. PALEONTOLOGICAL RESOURCES**

---

There are no corrections and additions to this section of the Draft EIR.

---

## II. CORRECTIONS AND ADDITIONS

### 29. ARCHAEOLOGICAL RESOURCES

---

**29.a** Volume I, Book 3, Section IV.P.(2), Archaeological Resources, Subsection 4.0, Mitigation Measures. Replace the first sentence of the first mitigation bullet with the following:

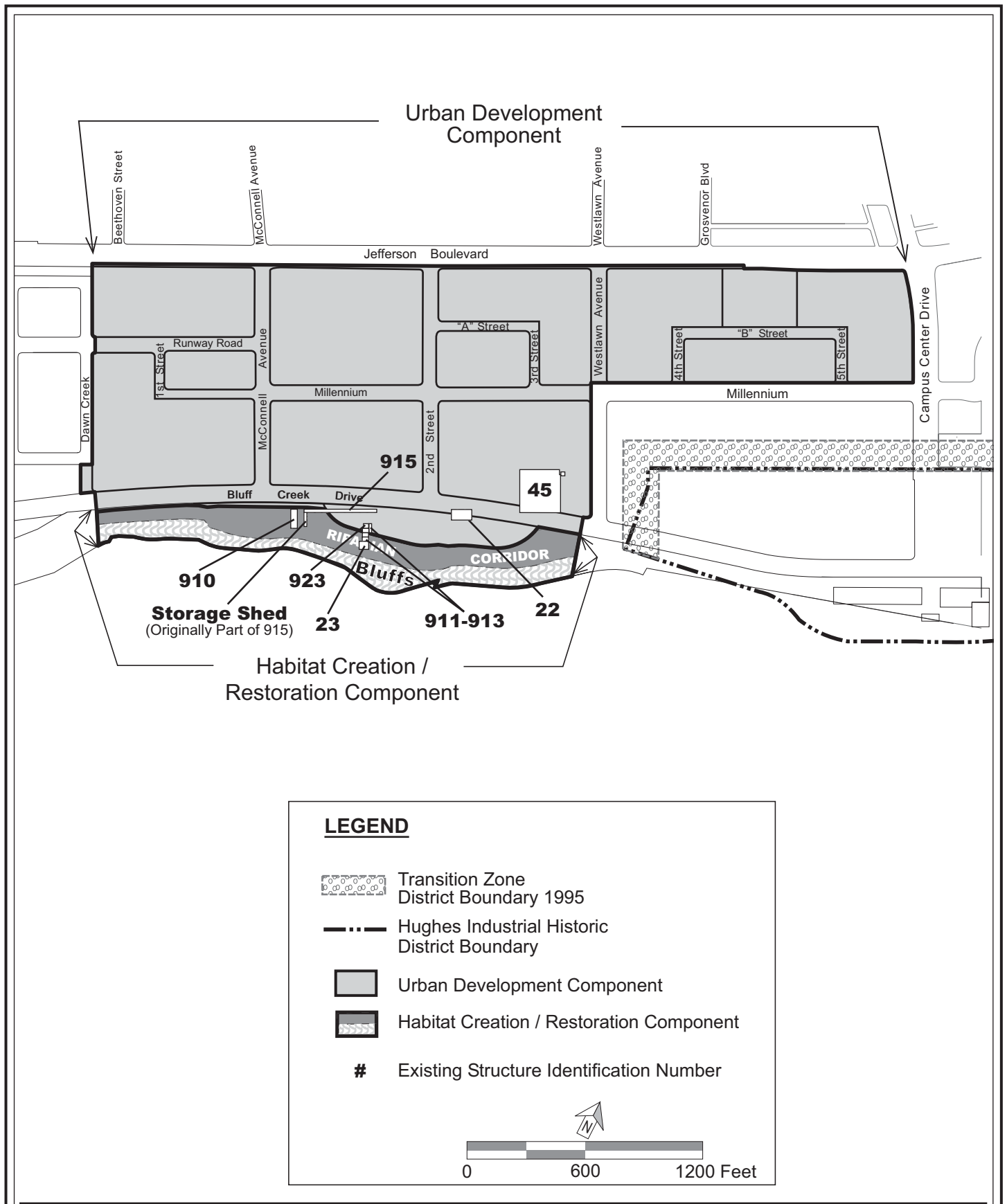
- Prior to the issuance of any grading/excavation or building permits (except for grading/excavation permits associated with archaeological investigations) which may affect the properties designated as LAN-211/H and LAN-62, the measures required within the approved Archaeological Treatment Plans for these properties, which have been determined eligible for listing in the National Register of Historic Places and accepted by the U.S. Army Corps of Engineers, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation shall be implemented.

---

**II. CORRECTIONS AND ADDITIONS**  
**30. HISTORIC RESOURCES**

---

- 30.a** Volume I, Book 3, Section IV.P.(3), Historic Resources, Figure 109, page 1238. Replace the figure with the revised Figure 109 as shown on page 261.



Revised Draft EIR Figure 109,  
**Existing Structures Located  
 Within the Proposed Project Site**

Source: PCR Services Corporation and Historic Resources Group, March 2004





---

**II. CORRECTIONS AND ADDITIONS**  
**31. GROWTH-INDUCING IMPACTS**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**31. GROWTH-INDUCING IMPACTS**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**32. SIGNIFICANT IRREVERSIBLE IMPACTS**

---

There are no corrections and additions to this section of the Draft EIR.

---

## II. CORRECTIONS AND ADDITIONS

### 33. ALTERNATIVES

---

- 33.a** Volume I, Book 3, Section VII, Alternatives, page 1263, first bullet point. Replace the third sentence with the following:

“They would produce no housing. The Habitat Restoration Alternative may produce a limited number of maintenance jobs. The Regional Park Alternative could produce jobs such as maintenance staff, caretakers, etc., although the number of jobs would be substantially less when compared to the Proposed Project.”

- 33.b** Volume I, Book 3, Section VII, Alternatives, page 1266. Insert the following between the second and third paragraphs.

“The following alternatives analysis reflects the baseline 2010 conditions with Playa Vista Drive road and bridge. The analysis is also applicable to the alternative 2010 baseline scenario (i.e., the “No Playa Vista Drive road and bridge” scenario) for the reasons outlined below.

The total number of trips generated by the Proposed Project or any of the Alternatives under either scenario would be the same. Therefore, the trip generation comparisons of the proposed project and each of the alternatives in Appendix K remain the same. Variations between the two scenarios would be limited to a redistribution of trips among a limited number of intersections in the proximity of the Proposed Project. Further, the variation in trip distribution that would occur would be similar for all the alternatives, and would in large part be due to a change in travel patterns by non-Project (or non-Alternative) vehicles whose travel behavior would be affected by the elimination of Playa Vista Drive road and bridge from the 2010 baseline conditions. The resulting redistribution of vehicle trips would be limited to specific intersections, and would be subject to the same proportional redistribution under the Proposed Project as with each of the Alternatives. The conclusions for each alternative relative to the Proposed Project would be the same for both 2010 baseline scenarios (i.e., with and without Playa Vista Drive bridge and road).”

- 33.c** Volume I, Book 3, Section VII, Alternatives, Table 230, page 1428, second row of the table. In the Alternative 1: No Project column, replace the number of LOS E or F

intersections to reflect 84 intersections in the A.M. peak hour and 104 in the P.M. peak hour. In the Proposed Project column, add a footnote <sup>d</sup> to the number of LOS E or F intersections that states the following:

“Under the No Playa Vista Bridge 2010 Baseline Scenario, the Proposed Project would result in 92 and 108 locations at LOS E or F in the A.M. and P.M. peak hours, respectively, prior to mitigation.”

---

**II. CORRECTIONS AND ADDITIONS**  
**34. ORGANIZATIONS AND PERSONS CONTACTED**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**35. LIST OF ACRONYMS**

---

There are no corrections and additions to this section of the Draft EIR.

---

**II. CORRECTIONS AND ADDITIONS**  
**36. REFERENCES**

---

There are no corrections and additions to this section of the Draft EIR.



---

## II. CORRECTIONS AND ADDITIONS

### 37. APPENDICES

---

- 37.a** Volume III, Appendix D, Table of Contents, revise Appendix D-2 heading to read as follows: “Group Delta Consultants. Final Assessment, Slopes Below Cabora Road Riparian Corridor, Playa Vista Development, Los Angeles, CA GDC Project No. L-194B” December 3, 2001, revised January 31, 2002, and approved on February 19, 2002.” (Volume III, Appendix D, Appendix D-2: The revised Appendix has been added to the Final EIR as an Appendix.)
- 37.b** Volume VII, Appendix E-8, Air Quality Management Plan, page 5, fourth bullet. Replace with the following:
- “Low Emission Equipment and Technologies: Use Low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.”
- 37.c** Volume VII, Appendix E-8, Air Quality Management Plan, page 7. Replace the first bullet with the following:
- “All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible, or shall maintain at least two feet of freeboard (ie., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Sections 23114.”
- 37.d** Volume VII, Appendix E-8, Air Quality Management Plan, page 7, ninth bullet under Building Materials and Architectural Coatings. Add the following after the first sentence:
- “Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.”
- 37.e** Volume VII, Appendix E-8, Air Quality Management Plan, page 10, Subheading 4.3.2.3, Building Materials and Architectural Coatings. Add the following after the first sentence:
- “Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.”

- 37.f** Volume VIII, Appendix F-1, Water Resources Technical Report, Volume 1, Section 3, Table 3-19. Replace the table with Table 3-19 as shown on page 271 to correct typographical errors.
- 37.g** Volume VIII, Appendix F-1, Water Resources Technical Report, Volume 1, Section 3, Table 3-44. Replace the table with Table 3-44 as shown on page 272 to correct typographical errors.
- 37.h** Volume VIII, Appendix F-1, Water Resources Technical Report, Volume 1, Section 3, Table 3-54B. Replace the table with Table 3-54B as shown on page 273 to correct typographical errors.
- 37.i** Volume XX, Appendix K-2, page I-4, revise the thresholds of significance to correct typographical errors to read as follows:

Final V/C	Change in V/C
0.701-0.800	0.040 or greater
0.801-0.900	0.020 or greater
0.901 or greater	0.010 or greater

- 37.j** Volume XX, Technical Appendix K-2, Table 9-2. Make the following revisions in the “2010 with Project with Mitigation Program” column to correct typographical errors:

Lincoln Boulevard/Hughes Terrace, page IX-3c, replace the AM V/C and V/C increase, respectively, with the following: “0.598” and “0.013.”

Jefferson Boulevard/Sepulveda Boulevard. (N), page IX-3i and Sepulveda Boulevard/Sawtelle Boulevard, page IX-3j, replace the AM V/C and V/C increase and the PM V/C and V/C increase, respectively, with the following: “1.058,” “-0.021,” “0.964,” and “-0.022.”

Walgrove Avenue/Washington Boulevard., page IX-3j, replace the AM V/C and V/C increase, respectively, with the following: “0.792” and “0.000.”

- 37.k** Volume XX, Appendix K-2, Page IX-4. Add to the end of the Appendix, Table 9-3, Intersection Operating Conditions – Future 2010 with Project and Updated Mitigation – No Playa Vista Drive Bridge Baseline. The new Table 9-3 is shown on page 274.
- 37.l** Volume XX, Appendix K-2, Page IX-4. Add to the end of the Appendix, and after the new Table 9-3, a new Table 9-4, Summary of the Playa Vista Drive Bridge and No Playa Vista Drive Bridge Baseline. The new Table 9-4 is shown on page 295.

Table 3-19

**REVISED DRAFT EIR TABLE 3-19, EFFLUENT QUALITY APPROXIMATIONS  
FOR RIPARIAN CORRIDOR AND CENTINELA DITCH USED IN POLLUTANT  
LOADING MODEL**

<b>Parameter</b>	<b>No. of Studies</b>	<b>Riparian Corridor</b>	<b>Centinela Ditch</b>	<b>Units</b>
Total Suspended Solids <sup>a</sup>	5	24.9	89.2	mg/L
Total Phosphorus	21	0.3	0.3	mg/L
Total Kjeldahl Nitrogen	11	1.5	1.8	mg/L
Oil and Grease <sup>b</sup>	see below	1.3	2.7	mg/L
Total Copper	11	11.4	20.3	ug/L
Dissolved Copper	8	9.9	14.5	ug/L
Total Lead	15	9.6	14.1	ug/L
Dissolved Lead	5	4.4	10.7	ug/L
Total Zinc <sup>a</sup>	11	140.6	208.8	ug/L
Dissolved Zinc <sup>a</sup>	5	35.2	52.5	ug/L

*Calculated from the National Stormwater Best Management Practices Database bioswales, wetland channel, and wet pond outflow concentration data. Unless noted, median outflow concentrations are used for the Riparian Corridor and 75th percentiles are used for the Centinela Ditch. Only studies with average EMC influent concentrations within 70 percent of the predicted influent concentrations were used. Studies with less than 3 events or with effluent concentrations larger than influent concentrations were omitted.*

<sup>a</sup> *The 75th and 90th percentiles were used instead of the median and the 75th percentiles, respectively, to account for the relatively high influent concentrations expected for these parameters in comparison to the effluent data.*

<sup>b</sup> *The oil and grease estimate for the Riparian Corridor is taken from only one study (NW Wetland Channel) contained in the database that was chosen based on the order of magnitude of influent oil and grease predicted. The oil and grease estimate for the Centinela Ditch is taken as the median of two studies contained in the database, a biofilter and a bioretention area.*

**Table 3-44**

**REVISED DRAFT EIR TABLE 3-44, REPRESENTATIVE STORMWATER  
CONCENTRATIONS IN THE PRIMARY MANAGEMENT AREAS  
AND THE MAIN BODY OF THE FRESHWATER MARSH  
COMPARED TO NUTRIENT WATER QUALITY BENCHMARKS  
AFTER PROPOSED PROJECT**

*Jefferson Storm Drain Primary Management Area*

<b>Parameter</b>	<b>Water Quality Benchmark<sup>a</sup></b>	<b>Predicted Concentration</b>
Total Phosphorus, TP (mg/L)	2.8	0.22
Total Kjeldahl Nitrogen, TKN (mg/L)	3.3	1.8

*Central Storm Drain Primary Management Area*

<b>Parameter</b>	<b>Water Quality Benchmark<sup>a</sup></b>	<b>Predicted Concentration</b>
Total Phosphorus, TP (mg/L)	2.8	0.25
Total Kjeldahl Nitrogen, TKN (mg/L)	3.3	1.9

*Riparian Corridor/Lincoln Storm Drain South Primary Management Area*

<b>Parameter</b>	<b>Water Quality Benchmark<sup>a</sup></b>	<b>Predicted Concentration</b>
Total Phosphorus (mg/L)	2.8	0.25
Total Kjeldahl Nitrogen, TKN (mg/L)	3.3	1.4

*Main Body of Marsh*

<b>Parameter</b>	<b>Water Quality Benchmark<sup>a</sup></b>	<b>Predicted Concentration</b>
Total Phosphorus, TP (mg/L)	2.8	0.20
Total Kjeldahl Nitrogen, TKN (mg/L)	3.3	1.3

*mg/L = milligrams per liter*

<sup>a</sup> U.S. EPA, 2000. *Ambient Water Quality Criteria Recommendations: Information Supporting the Development of State and Tribal Nutrient Criteria for Rivers and Streams in Nutrient Ecoregion III. EPA 822-B-00-016*

*Source: GeoSyntec Consultants*

**Table 3-54B**

**REVISED DRAFT EIR TABLE 3-54B, REPRESENTATIVE STORMWATER CONCENTRATIONS TO THE BALLONA CHANNEL WITH PLAYA VISTA FIRST PHASE AND PROPOSED PROJECT**

	Summary Concentrations <sup>a</sup>									
	(mg/L)				(µg/L)					
	TSS	TP	TKN	O&G	TCu	DCu	TPb	DPb	TZn	DZn
Freshwater Marsh Effluent (92% of FWM Influent) <sup>b</sup>	11.3	0.13	0.84	0.90	6.0	2.9	4.6	2.7	20.9	6.9
Ballona Wetlands Effluent	39.5	0.18	1.30	0.95	10.9	5.5	4.2	2.1	36.9	15.2
<b>Total Ballona Channel Influent</b>	<b>18.5</b>	<b>0.15</b>	<b>0.95</b>	<b>0.91</b>	<b>7.3</b>	<b>4.9</b>	<b>4.5</b>	<b>2.5</b>	<b>25.0</b>	<b>9.5</b>

<sup>a</sup> Totals calculated prior to rounding.

<sup>b</sup> Effective influent dissolved metals values were used to account for observed dissolved and particulate metals fractionation in estuarine waters. For a more detailed explanation, see Volume III, Appendix G, of the Water Resources Technical Report (Appendix F 1).

*mg/L = milligrams per liter      µg/L = micrograms per liter      ft<sup>3</sup>/yr = cubic feet per year      TSS = Total Suspended Solids*  
*TP = Total Phosphorus      TKN = Total Kjeldahl Nitrogen      O&G = Oil and Grease      TCu = Total Copper*  
*DCu = Dissolved Copper      TPb = Total Lead      DPb = Dissolved Lead      TZn = Total Zinc*  
*DZn = Dissolved Zinc*

Source: GeoSyntec Consultants

Table 9-3

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program					
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact		
<b>City of Los Angeles</b>														
111 <sup>th</sup> Street	@	La Cienega Boulevard	192	A.M.	0.273	A	0.273	A	0.000	N	0.273	A	0.000	N
				P.M.	0.531	A	0.532	A	0.001	N	0.532	A	0.001	N
12th Street	@	Teale Street/Bluff Creek Drive	220	A.M.	0.336	A	0.401	A	0.065	N	0.651	B	0.315	N
				P.M.	0.421	A	0.529	A	0.108	N	0.675	B	0.254	N
77th Street/76th Street	@	Sepulveda Boulevard	64	A.M.	1.048	F	1.056	F	0.008	N	1.029	F	-0.019	N
				P.M.	1.000	E	1.034	F	0.034	Y	1.007	F	0.007	N
80th Street/79th Street	@	Sepulveda Boulevard	91	A.M.	0.761	C	0.767	C	0.006	N	0.741	C	-0.020	N
				P.M.	1.005	F	1.022	F	0.017	Y	0.997	E	-0.008	N
83rd Street	@	Lincoln Boulevard	45	A.M.	1.339	F	1.366	F	0.027	Y	1.265	F	-0.074	N
				P.M.	1.021	F	1.083	F	0.062	Y	1.011	F	-0.010	N
83rd Street	@	Sepulveda Boulevard	92	A.M.	0.738	C	0.742	C	0.004	N	0.742	C	0.004	N
				P.M.	0.859	D	0.873	D	0.014	N	0.873	D	0.014	N
88th Street/La Tijera Blvd.	@	Sepulveda Boulevard	44	A.M.	0.843	D	0.847	D	0.004	N	0.819	D	-0.024	N
				P.M.	0.913	E	0.932	E	0.019	Y	0.905	E	-0.008	N
96th Street	@	Airport Boulevard	68	A.M.	0.419	A	0.427	A	0.008	N	0.427	A	0.008	N
				P.M.	0.672	B	0.688	B	0.016	N	0.688	B	0.016	N
Abbott Kinney Boulevard	@	Venice Boulevard	171	A.M.	0.707	C	0.710	C	0.003	N	0.710	C	0.003	N
				P.M.	0.764	C	0.771	C	0.007	N	0.771	C	0.007	N
Airport Boulevard	@	Century Boulevard	2	A.M.	0.626	B	0.631	B	0.005	N	0.631	B	0.005	N
				P.M.	0.652	B	0.659	B	0.007	N	0.659	B	0.007	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Airport Boulevard @ La Tijera Boulevard	3	A.M.	0.742	C	0.743	C	0.001	N	0.743	C	0.001	N
		P.M.	0.715	C	0.715	C	0.000	N	0.715	C	0.000	N
Airport Boulevard @ Manchester Avenue	172	A.M.	0.752	C	0.757	C	0.005	N	0.757	C	0.005	N
		P.M.	0.870	D	0.878	D	0.008	N	0.878	D	0.008	N
Airport Boulevard @ Westchester Parkway/Arbor Vitae Street	1	A.M.	0.707	C	0.707	C	0.000	N	0.707	C	0.000	N
		P.M.	0.819	D	0.825	D	0.006	N	0.825	D	0.006	N
Alla Road @ Jefferson Boulevard	69	A.M.	0.722	C	0.755	C	0.033	N	0.755	C	0.033	N
		P.M.	0.525	A	0.563	A	0.038	N	0.563	A	0.038	N
Arbor Vitae Street @ Aviation Boulevard	4	A.M.	0.667	B	0.670	B	0.003	N	0.670	B	0.003	N
		P.M.	0.802	D	0.807	D	0.005	N	0.807	D	0.005	N
Aviation Boulevard @ Century Boulevard	6	A.M.	0.886	D	0.888	D	0.002	N	0.888	D	0.002	N
		P.M.	0.972	E	0.981	E	0.009	N	0.981	E	0.009	N
Aviation Boulevard @ Imperial Highway	7	A.M.	0.865	D	0.865	D	0.000	N	0.865	D	0.000	N
		P.M.	0.908	E	0.908	E	0.000	N	0.908	E	0.000	N
Playa Vista Drive @ B Street	216	A.M.	N/A	–	N/A	–	N/A	–	N/A	–	N/A	N
		P.M.	N/A	–	N/A	–	N/A	–	N/A	–	N/A	N
Beethoven Street @ Jefferson Boulevard	70	A.M.	0.520	A	0.552	A	0.032	N	0.552	A	0.032	N
		P.M.	0.495	A	0.530	A	0.035	N	0.530	A	0.035	N
Sawtelle Boulevard @ Braddock Drive	152	A.M.	0.699	B	0.703	C	0.004	N	0.703	C	0.004	N
		P.M.	0.753	C	0.758	C	0.005	N	0.758	C	0.005	N
Main Street @ Brooks Avenue/Abbot Kinney Boulevard	71	A.M.	0.610	B	0.611	B	0.001	N	0.611	B	0.001	N
		P.M.	0.858	D	0.860	D	0.002	N	0.860	D	0.002	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Bundy Drive @ I-10 EB On-Ramp	173	A.M.	1.297	F	1.297	F	0.000	N	1.297	F	0.000	N
		P.M.	1.169	F	1.169	F	0.000	N	1.169	F	0.000	N
Bundy Drive @ Ocean Park Boulevard	72	A.M.	1.086	F	1.098	F	0.012	Y	1.068	F	-0.018	N
		P.M.	1.332	F	1.348	F	0.016	Y	1.318	F	-0.014	N
Centinela Avenue @ Culver Boulevard	11	A.M.	0.916	E	0.931	E	0.015	Y	0.889	D	-0.027	N
		P.M.	0.857	D	0.878	D	0.021	Y	0.867	D	0.010	N
Centinela Avenue @ Jefferson Boulevard	12	A.M.	1.070	F	1.160	F	0.090	Y	0.863	D	-0.207	N
		P.M.	0.883	D	0.986	E	0.103	Y	0.840	D	-0.043	N
La Cienega Boulevard @ Centinela Avenue	13	A.M.	1.201	F	1.211	F	0.010	Y	1.181	F	-0.020	N
		P.M.	1.253	F	1.262	F	0.009	N	1.232	F	-0.021	N
La Tijera Boulevard @ Centinela Avenue	14	A.M.	1.048	F	1.089	F	0.041	Y	0.914	E	-0.134	N
		P.M.	0.872	D	0.902	E	0.030	Y	0.798	C	-0.074	N
Centinela Avenue @ Marina Freeway EB Ramps	73	A.M.	0.450	A	0.506	A	0.056	N	0.506	A	0.056	N
		P.M.	0.671	B	0.707	C	0.036	N	0.707	C	0.036	N
Centinela Avenue @ Marina Freeway WB Ramps	74	A.M.	0.592	A	0.611	B	0.019	N	0.611	B	0.019	N
		P.M.	0.534	A	0.565	A	0.031	N	0.565	A	0.031	N
Mesmer Avenue @ Centinela Avenue	75	A.M.	0.444	A	0.462	A	0.018	N	0.462	A	0.018	N
		P.M.	0.413	A	0.453	A	0.040	N	0.453	A	0.040	N
Centinela Avenue @ Short Avenue	123	A.M.	0.680	B	0.693	B	0.013	N	0.693	B	0.013	N
		P.M.	0.634	B	0.653	B	0.019	N	0.653	B	0.019	N
Bluff Creek Drive @ Centinela Avenue	76	A.M.	0.484	A	0.522	A	0.038	N	0.557	A	0.073	N
		P.M.	0.609	B	0.744	C	0.135	Y	0.653	B	0.044	N



**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Centinela Avenue @ Venice Boulevard	209	A.M.	1.228	F	1.248	F	0.020	Y	1.199	F	-0.029	N
		P.M.	1.332	F	1.350	F	0.018	Y	1.251	F	-0.081	N
Sepulveda Boulevard @ Century Boulevard	17	A.M.	0.691	B	0.698	B	0.007	N	0.698	B	0.007	N
		P.M.	0.887	D	0.895	D	0.008	N	0.895	D	0.008	N
Crenshaw Boulevard @ Florence Avenue	180	A.M.	0.815	D	0.817	D	0.002	N	0.817	D	0.002	N
		P.M.	0.873	D	0.875	D	0.002	N	0.875	D	0.002	N
Crenshaw Boulevard @ Slauson Avenue	178	A.M.	1.057	F	1.059	F	0.002	N	1.059	F	0.002	N
		P.M.	1.289	F	1.292	F	0.003	N	1.292	F	0.003	N
Crenshaw Boulevard @ Stocker Street	174	A.M.	0.793	C	0.799	C	0.006	N	0.799	C	0.006	N
		P.M.	0.794	C	0.799	C	0.005	N	0.799	C	0.005	N
Inglewood Boulevard @ Culver Boulevard	77	A.M.	0.828	D	0.867	D	0.039	Y	0.681	B	-0.147	N
		P.M.	0.966	E	1.040	F	0.074	Y	0.821	D	-0.145	N
Culver Boulevard @ Jefferson Boulevard	18	A.M.	0.802	D	0.821	D	0.019	N	0.793	C	-0.009	N
		P.M.	0.806	D	0.827	D	0.021	Y	0.799	C	-0.007	N
Culver Boulevard @ Marina Expressway EB Ramps	19	A.M.	0.715	C	0.715	C	0.000	N	0.715	C	0.000	N
		P.M.	0.618	B	0.625	B	0.007	N	0.625	B	0.007	N
Culver Boulevard @ Marina Expressway WB Ramps	20	A.M.	0.832	D	0.833	D	0.001	N	0.833	D	0.001	N
		P.M.	0.864	D	0.873	D	0.009	N	0.873	D	0.009	N
Culver Boulevard @ Nicholson Street	78	A.M.	0.917	E	0.933	E	0.016	Y	0.907	E	-0.010	N
		P.M.	0.739	C	0.765	C	0.026	N	0.739	C	0.000	N
Playa Vista Drive @ Culver Boulevard	215	A.M.	N/A	-	N/A	-	N/A	-	N/A	-	N/A	N
		P.M.	N/A	-	N/A	-	N/A	-	N/A	-	N/A	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int. #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Culver Boulevard @ Venice Boulevard	161	A.M.	1.035	F	1.039	F	0.004	N	1.039	F	0.004	N
		P.M.	0.994	E	0.997	E	0.003	N	0.997	E	0.003	N
Culver Boulevard @ Vista del Mar	22	A.M.	0.883	D	0.896	D	0.013	N	0.896	D	0.013	N
		P.M.	0.599	A	0.618	B	0.019	N	0.618	B	0.019	N
Lincoln Boulevard Ramp @ Culver Boulevard (Southeast)	142	A.M.	0.513	A	0.513	A	0.000	N	0.513	A	0.000	N
		P.M.	0.227	A	0.227	A	0.000	N	0.227	A	0.000	N
La Cienega Boulevard @ Fairfax Avenue	67	A.M.	1.113	F	1.121	F	0.008	N	1.121	F	0.008	N
		P.M.	0.929	E	0.938	E	0.009	N	0.938	E	0.009	N
Fairfax Avenue @ Washington Boulevard	179	A.M.	1.225	F	1.233	F	0.008	N	1.233	F	0.008	N
		P.M.	0.693	B	0.700	B	0.007	N	0.700	B	0.007	N
Falmouth Avenue @ Manchester Avenue	79	A.M.	0.455	A	0.463	A	0.008	N	0.463	A	0.008	N
		P.M.	0.594	A	0.597	A	0.003	N	0.597	A	0.003	N
Glencoe Avenue @ Maxella Avenue	80	A.M.	0.323	A	0.323	A	0.000	N	0.323	A	0.000	N
		P.M.	0.571	A	0.572	A	0.001	N	0.572	A	0.001	N
Vista del Mar @ Grand Avenue	177	A.M.	0.803	D	0.809	D	0.006	N	0.809	D	0.006	N
		P.M.	0.540	A	0.548	A	0.008	N	0.548	A	0.008	N
Sepulveda Boulevard @ Howard Hughes Parkway	26	A.M.	0.968	E	0.990	E	0.022	Y	0.944	E	-0.024	N
		P.M.	0.969	E	1.018	F	0.049	Y	0.973	E	0.004	N
Lincoln Boulevard @ Hughes Terrace	81	A.M.	0.585	A	0.605	B	0.020	N	0.598	A	0.013	N
		P.M.	0.780	C	0.824	D	0.044	Y	0.798	C	0.018	N
La Brea Avenue @ I-10 EB Off-Ramp	186	A.M.	0.585	A	0.586	A	0.001	N	0.586	A	0.001	N
		P.M.	0.689	B	0.691	B	0.002	N	0.691	B	0.002	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
La Cienega Boulevard @ I-10 EB Off-Ramp	191	A.M.	0.814	D	0.815	D	0.001	N	0.815	D	0.001	N
		P.M.	0.785	C	0.786	C	0.001	N	0.786	C	0.001	N
Washington Boulevard @ I-10 EB On-Ramp	210	A.M.	0.551	A	0.563	A	0.012	N	0.563	A	0.012	N
		P.M.	0.661	B	0.667	B	0.006	N	0.667	B	0.006	N
La Brea Avenue @ I-10 WB Off-Ramp	187	A.M.	0.639	B	0.639	B	0.000	N	0.639	B	0.000	N
		P.M.	0.639	B	0.639	B	0.000	N	0.639	B	0.000	N
Washington Boulevard @ I-10 WB Off-Ramp/Apple Street	211	A.M.	0.531	A	0.536	A	0.005	N	0.536	A	0.005	N
		P.M.	0.577	A	0.583	A	0.006	N	0.583	A	0.006	N
Sepulveda Boulevard @ I-105 WB Off-Ramp	63	A.M.	1.237	F	1.246	F	0.009	N	1.216	F	-0.021	N
		P.M.	1.237	F	1.256	F	0.019	Y	1.226	F	-0.011	N
I-405 NB Ramps @ Jefferson Boulevard	30	A.M.	0.908	E	0.948	E	0.040	Y	0.877	D	-0.031	N
		P.M.	1.362	F	1.372	F	0.010	Y	1.163	F	-0.199	N
I-405 NB Ramps @ La Tijera Boulevard	40	A.M.	0.693	B	0.693	B	0.000	N	0.693	B	0.000	N
		P.M.	0.763	C	0.763	C	0.000	N	0.763	C	0.000	N
I-405 SB Ramps @ Jefferson Boulevard	31	A.M.	0.769	C	0.824	D	0.055	Y	0.768	C	-0.001	N
		P.M.	0.811	D	0.833	D	0.022	Y	0.830	D	0.019	N
I-405 SB Ramps @ La Tijera Boulevard	41	A.M.	0.668	B	0.668	B	0.000	N	0.668	B	0.000	N
		P.M.	0.703	C	0.703	C	0.000	N	0.703	C	0.000	N
La Cienega Boulevard @ I-405 SB Ramps N/O Century Boulevard	201	A.M.	0.633	B	0.634	B	0.001	N	0.634	B	0.001	N
		P.M.	0.620	B	0.623	B	0.003	N	0.623	B	0.003	N
La Cienega Boulevard @ I-405 SB Ramps N/O Imperial Highway	194	A.M.	0.453	A	0.454	A	0.001	N	0.454	A	0.001	N
		P.M.	0.306	A	0.307	A	0.001	N	0.307	A	0.001	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
La Cienega Boulevard @ I-405 SB Ramps S/O Century Boulevard	193	A.M.	0.541	A	0.543	A	0.002	N	0.543	A	0.002	N
		P.M.	0.506	A	0.508	A	0.002	N	0.508	A	0.002	N
La Cienega Boulevard @ Imperial Highway	185	A.M.	0.645	B	0.645	B	0.000	N	0.645	B	0.000	N
		P.M.	0.464	A	0.464	A	0.000	N	0.464	A	0.000	N
Pershing Drive @ Imperial Highway	27	A.M.	0.955	E	0.957	E	0.002	N	0.957	E	0.002	N
		P.M.	0.521	A	0.525	A	0.004	N	0.525	A	0.004	N
Sepulveda Boulevard @ Imperial Highway	28	A.M.	0.969	E	0.974	E	0.005	N	0.944	E	-0.025	N
		P.M.	1.230	F	1.255	F	0.025	Y	1.225	F	-0.005	N
Vista del Mar @ Imperial Highway	184	A.M.	1.092	F	1.100	F	0.008	N	1.100	F	0.008	N
		P.M.	0.483	A	0.490	A	0.007	N	0.490	A	0.007	N
Inglewood Blvd./Centinela Ave. @ Jefferson Boulevard	82	A.M.	0.884	D	0.913	E	0.029	Y	0.859	D	-0.025	N
		P.M.	0.826	D	0.868	D	0.042	Y	0.845	D	0.019	N
La Cienega Boulevard @ Jefferson Boulevard	32	A.M.	1.308	F	1.316	F	0.008	N	1.316	F	0.008	N
		P.M.	1.178	F	1.185	F	0.007	N	1.185	F	0.007	N
Lincoln Boulevard @ Jefferson Boulevard	33	A.M.	0.997	E	1.031	F	0.034	Y	0.995	E	-0.002	N
		P.M.	1.053	F	1.098	F	0.045	Y	1.062	F	0.009	N
McConnell Avenue @ Jefferson Boulevard	83	A.M.	304.5 <sup>a</sup>	F	0.591	A	N/A	N	0.591	A	N/A	N
		P.M.	800 <sup>a</sup>	F	0.513	A	N/A	N	0.513	A	N/A	N
Mesmer Avenue @ Jefferson Boulevard	84	A.M.	0.468	A	0.494	A	0.026	N	0.471	A	0.003	N
		P.M.	0.501	A	0.551	A	0.050	N	0.551	A	0.050	N
Jefferson Boulevard @ National Boulevard	163	A.M.	0.466	A	0.469	A	0.003	N	0.469	A	0.003	N
		P.M.	0.635	B	0.646	B	0.011	N	0.646	B	0.011	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Playa Vista Drive @ Jefferson Boulevard	217	A.M.	0.619	B	0.649	B	0.030	N	0.649	B	0.030	N
		P.M.	0.581	A	0.614	B	0.033	N	0.596	A	0.015	N
Jefferson Boulevard @ Rodeo Road	164	A.M.	0.806	D	0.818	D	0.012	N	0.818	D	0.012	N
		P.M.	0.878	D	0.886	D	0.008	N	0.886	D	0.008	N
Westlawn Avenue @ Jefferson Boulevard	85	A.M.	0.583	A	0.635	B	0.052	N	0.635	B	0.052	N
		P.M.	0.594	A	0.674	B	0.080	N	0.674	B	0.080	N
La Cienega Boulevard @ La Tijera Boulevard	36	A.M.	0.898	D	0.904	E	0.006	N	0.904	E	0.006	N
		P.M.	0.789	C	0.799	C	0.010	N	0.799	C	0.010	N
La Cienega Boulevard @ Rodeo Road	37	A.M.	1.161	F	1.170	F	0.009	N	1.170	F	0.009	N
		P.M.	1.253	F	1.262	F	0.009	N	1.262	F	0.009	N
La Cienega Boulevard @ Venice Boulevard	198	A.M.	1.176	F	1.178	F	0.002	N	1.178	F	0.002	N
		P.M.	1.064	F	1.065	F	0.001	N	1.065	F	0.001	N
Lincoln Boulevard @ La Tijera Boulevard	42	A.M.	0.799	C	0.818	D	0.019	N	0.788	C	-0.011	N
		P.M.	0.868	D	0.894	D	0.026	Y	0.864	D	-0.004	N
La Tijera Boulevard @ Manchester Avenue	43	A.M.	0.747	C	0.752	C	0.005	N	0.752	C	0.005	N
		P.M.	0.769	C	0.777	C	0.008	N	0.777	C	0.008	N
Lincoln Boulevard @ Loyola Boulevard	86	A.M.	0.723	C	0.744	C	0.021	N	0.744	C	0.021	N
		P.M.	0.699	B	0.728	C	0.029	N	0.728	C	0.029	N
Lincoln Boulevard @ Manchester Avenue	46	A.M.	1.264	F	1.291	F	0.027	Y	1.261	F	-0.003	N
		P.M.	1.203	F	1.237	F	0.034	Y	1.207	F	0.004	N
Lincoln Boulevard @ Marina Expressway	47	A.M.	1.039	F	1.056	F	0.017	Y	1.048	F	0.009	N
		P.M.	1.096	F	1.113	F	0.017	Y	1.105	F	0.009	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Lincoln Boulevard @ Maxella Avenue	48	A.M.	0.897	D	0.909	E	0.012	Y	0.901	E	0.004	N
		P.M.	0.952	E	0.963	E	0.011	Y	0.955	E	0.003	N
Lincoln Boulevard @ Rose Avenue	50	A.M.	0.929	E	0.938	E	0.009	N	0.938	E	0.009	N
		P.M.	0.894	D	0.902	E	0.008	N	0.902	E	0.008	N
Sepulveda Boulevard @ Lincoln Boulevard	51	A.M.	0.595	A	0.603	B	0.008	N	0.603	B	0.008	N
		P.M.	0.819	D	0.836	D	0.017	N	0.836	D	0.017	N
Lincoln Boulevard @ Bluff Creek Drive (Hughes Way)	52	A.M.	0.710	C	0.737	C	0.027	N	0.730	C	0.020	N
		P.M.	0.874	D	0.927	E	0.053	Y	0.893	D	0.019	N
Lincoln Boulevard @ Venice Boulevard	53	A.M.	1.087	F	1.100	F	0.013	Y	1.086	F	-0.001	N
		P.M.	1.060	F	1.071	F	0.011	Y	1.065	F	0.005	N
Lincoln Boulevard @ Washington Boulevard	54	A.M.	1.153	F	1.163	F	0.010	Y	1.151	F	-0.002	N
		P.M.	1.241	F	1.254	F	0.013	Y	1.242	F	0.001	N
Main Street @ Rose Avenue	55	A.M.	0.510	A	0.511	A	0.001	N	0.511	A	0.001	N
		P.M.	0.900	D	0.903	E	0.003	N	0.903	E	0.003	N
Pershing Drive @ Manchester Avenue	56	A.M.	0.443	A	0.445	A	0.002	N	0.445	A	0.002	N
		P.M.	0.411	A	0.419	A	0.008	N	0.419	A	0.008	N
Sepulveda Boulevard @ Manchester Avenue	57	A.M.	1.001	F	1.008	F	0.007	N	0.950	E	-0.051	N
		P.M.	1.178	F	1.235	F	0.057	Y	1.184	F	0.006	N
Mindanao Way @ Marina Expressway EB Ramps	87	A.M.	0.804	D	0.804	D	0.000	N	0.804	D	0.000	N
		P.M.	0.889	D	0.893	D	0.004	N	0.893	D	0.004	N
Mindanao Way @ Marina Expressway WB Ramps	88	A.M.	0.560	A	0.562	A	0.002	N	0.562	A	0.002	N
		P.M.	0.635	B	0.635	B	0.000	N	0.635	B	0.000	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
McConnell Avenue @ Bluff Creek Drive	219	A.M.	N/A	N/A	0.315	A	N/A	N	0.315	A	N/A	N
		P.M.	N/A	N/A	0.485	A	N/A	N	0.485	A	N/A	N
Motor Avenue @ Venice Boulevard	160	A.M.	0.991	E	0.993	E	0.002	N	0.993	E	0.002	N
		P.M.	1.019	F	1.028	F	0.009	N	1.028	F	0.009	N
Ocean Avenue/Via Marina @ Washington Boulevard	94	A.M.	1.233	F	1.236	F	0.003	N	1.236	F	0.003	N
		P.M.	1.311	F	1.314	F	0.003	N	1.314	F	0.003	N
Overland Avenue @ Palms Boulevard	212	A.M.	0.913	E	0.915	E	0.002	N	0.915	E	0.002	N
		P.M.	1.106	F	1.111	F	0.005	N	1.111	F	0.005	N
Overland Avenue @ Venice Boulevard	157	A.M.	1.124	F	1.126	F	0.002	N	1.126	F	0.002	N
		P.M.	1.145	F	1.151	F	0.006	N	1.151	F	0.006	N
Pacific Avenue @ Washington Boulevard	89	A.M.	0.673	B	0.674	B	0.001	N	0.674	B	0.001	N
		P.M.	0.697	B	0.699	B	0.002	N	0.699	B	0.002	N
Palawan Way @ Washington Boulevard	90	A.M.	1.009	F	1.009	F	0.000	N	1.009	F	0.000	N
		P.M.	0.948	E	0.948	E	0.000	N	0.948	E	0.000	N
Pershing Drive @ Westchester Parkway	59	A.M.	0.432	A	0.434	A	0.002	N	0.434	A	0.002	N
		P.M.	0.388	A	0.392	A	0.004	N	0.392	A	0.004	N
Playa Vista Drive @ Bluff Creek Drive	218	A.M.	0.439	A	0.473	A	0.034	N	0.473	A	0.034	N
		P.M.	0.563	A	0.613	B	0.050	N	0.613	B	0.050	N
Sepulveda Boulevard @ Westchester Parkway	200	A.M.	1.056	F	1.062	F	0.006	N	1.009	F	-0.047	N
		P.M.	1.200	F	1.239	F	0.039	Y	1.185	F	-0.015	N
Walgrove Avenue @ Venice Boulevard	93	A.M.	0.864	D	0.866	D	0.002	N	0.866	D	0.002	N
		P.M.	1.079	F	1.082	F	0.003	N	1.082	F	0.003	N

Table 9-3

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program				
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact	
<b>County of Los Angeles</b>													
Admiralty Way	@ Bali Way	112	A.M.	0.771	C	0.775	C	0.004	N	0.775	C	0.004	N
			P.M.	1.069	F	1.078	F	0.009	N	1.078	F	0.009	N
Admiralty Way	@ Fiji Way	113	A.M.	0.473	A	0.477	A	0.004	N	0.477	A	0.004	N
			P.M.	0.647	B	0.659	B	0.012	N	0.659	B	0.012	N
Admiralty Way	@ Mindanao Way	114	A.M.	0.903	E	0.906	E	0.003	N	0.898	D	-0.005	N
			P.M.	1.132	F	1.145	F	0.013	Y	1.138	F	0.006	N
Palawan Way	@ Admiralty Way	115	A.M.	0.865	D	0.871	D	0.006	N	0.793	C	-0.072	N
			P.M.	1.132	F	1.145	F	0.013	Y	1.019	F	-0.113	N
Via Marina	@ Admiralty Way	116	A.M.	0.912	E	0.918	E	0.006	N	0.918	E	0.006	N
			P.M.	1.119	F	1.127	F	0.008	N	1.127	F	0.008	N
Alvern Street	@ Centinela Avenue	140	A.M.	0.741	C	0.762	C	0.021	N	0.762	C	0.021	N
			P.M.	0.752	C	0.781	C	0.029	N	0.781	C	0.029	N
Lincoln Boulevard	@ Bali Way	10	A.M.	0.833	D	0.844	D	0.011	N	0.834	D	0.001	N
			P.M.	1.018	F	1.034	F	0.016	Y	1.024	F	0.006	N
Sherbourne Drive	@ Centinela Avenue	141	A.M.	0.785	C	0.807	D	0.022	Y	0.777	C	-0.008	N
			P.M.	0.700	B	0.724	C	0.024	N	0.694	B	-0.006	N
I-405 NB Off-Ramp	@ Century Boulevard	202	A.M.	1.114	F	1.115	F	0.001	N	1.115	F	0.001	N
			P.M.	0.600	A	0.601	B	0.001	N	0.601	B	0.001	N
Corning Avenue	@ Slauson Avenue	144	A.M.	0.859	D	0.864	D	0.005	N	0.864	D	0.005	N
			P.M.	0.691	B	0.696	B	0.005	N	0.696	B	0.005	N



**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int. #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Fairfax Avenue @ Slauson Avenue	147	A.M.	1.091	F	1.092	F	0.001	N	1.092	F	0.001	N
		P.M.	1.008	F	1.015	F	0.007	N	1.015	F	0.007	N
Lincoln Boulevard @ Fiji Way	24	A.M.	0.779	C	0.792	C	0.013	N	0.774	C	-0.005	N
		P.M.	0.903	E	0.927	E	0.024	Y	0.910	E	0.007	N
Hawthorne Boulevard @ I-105 EB Off-Ramp	203	A.M.	0.519	A	0.519	A	0.000	N	0.519	A	0.000	N
		P.M.	0.600	A	0.600	A	0.000	N	0.600	A	0.000	N
Hawthorne Boulevard @ Lennox Boulevard	204	A.M.	0.662	B	0.662	B	0.000	N	0.662	B	0.000	N
		P.M.	0.840	D	0.841	D	0.001	N	0.841	D	0.001	N
Inglewood Avenue @ Lennox Boulevard	205	A.M.	0.825	D	0.827	D	0.002	N	0.827	D	0.002	N
		P.M.	0.920	E	0.921	E	0.001	N	0.921	E	0.001	N
Kings Road @ Slauson Avenue	145	A.M.	0.558	A	0.559	A	0.001	N	0.559	A	0.001	N
		P.M.	0.575	A	0.586	A	0.011	N	0.586	A	0.011	N
La Brea Avenue @ Slauson Avenue	189	A.M.	1.132	F	1.139	F	0.007	N	1.139	F	0.007	N
		P.M.	1.081	F	1.090	F	0.009	N	1.090	F	0.009	N
La Brea Ave./Overhill Drive @ Stocker Street	190	A.M.	0.953	E	0.956	E	0.003	N	0.956	E	0.003	N
		P.M.	1.168	F	1.174	F	0.006	N	1.174	F	0.006	N
La Cienega Boulevard @ Lennox Boulevard	195	A.M.	0.402	A	0.405	A	0.003	N	0.405	A	0.003	N
		P.M.	0.516	A	0.519	A	0.003	N	0.519	A	0.003	N
La Cienega Boulevard @ Stocker Street	197	A.M.	1.335	F	1.341	F	0.006	N	1.341	F	0.006	N
		P.M.	1.218	F	1.225	F	0.007	N	1.225	F	0.007	N
La Cienega Blvd. Ramps N @ Slauson Avenue	38	A.M.	0.926	E	0.926	E	0.000	N	0.926	E	0.000	N
		P.M.	0.625	B	0.629	B	0.004	N	0.629	B	0.004	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
La Cienega Blvd. Ramps S @ Slauson Avenue	39	A.M.	0.795	C	0.804	D	0.009	N	0.804	D	0.009	N
		P.M.	0.758	C	0.773	C	0.015	N	0.773	C	0.015	N
La Tijera Boulevard @ Slauson Avenue	146	A.M.	0.616	B	0.617	B	0.001	N	0.617	B	0.001	N
		P.M.	0.734	C	0.743	C	0.009	N	0.743	C	0.009	N
Lincoln Boulevard @ Mindanao Way	49	A.M.	0.996	E	1.013	F	0.017	Y	1.001	F	0.005	N
		P.M.	1.152	F	1.171	F	0.019	Y	1.159	F	0.007	N
Shenandoah Avenue @ Slauson Avenue	143	A.M.	0.753	C	0.759	C	0.006	N	0.759	C	0.006	N
		P.M.	0.641	B	0.648	B	0.007	N	0.648	B	0.007	N
<b><u>City of Culver City</u></b>												
Overland Avenue @ Braddock Drive	159	A.M.	0.881	D	0.897	D	0.016	N	0.897	D	0.016	N
		P.M.	0.965	E	0.974	E	0.009	N	0.974	E	0.009	N
Sepulveda Boulevard @ Braddock Drive	153	A.M.	0.847	D	0.849	D	0.002	N	0.849	D	0.002	N
		P.M.	0.968	E	0.974	E	0.006	N	0.974	E	0.006	N
Bristol Parkway @ Centinela Avenue	96	A.M.	0.603	B	0.625	B	0.022	N	0.625	B	0.022	N
		P.M.	0.571	A	0.620	B	0.049	N	0.620	B	0.049	N
Bristol Parkway @ Slauson Avenue	95	A.M.	0.725	C	0.730	C	0.005	N	0.730	C	0.005	N
		P.M.	0.675	B	0.684	B	0.009	N	0.684	B	0.009	N
Buckingham Parkway @ Slauson Avenue	97	A.M.	0.792	C	0.796	C	0.004	N	0.796	C	0.004	N
		P.M.	0.792	C	0.801	D	0.009	N	0.801	D	0.009	N
Green Valley Circle @ Centinela Avenue	98	A.M.	0.895	D	0.916	E	0.021	Y	0.735	C	-0.160	N
		P.M.	0.670	B	0.699	B	0.029	N	0.681	B	0.011	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Sepulveda Boulevard @ Centinela Avenue	15	A.M.	1.240	F	1.270	F	0.030	Y	1.169	F	-0.071	N
		P.M.	1.201	F	1.271	F	0.070	Y	1.208	F	0.007	N
Centinela Avenue @ Washington Boulevard	16	A.M.	0.882	D	0.901	E	0.019	Y	0.889	D	0.007	N
		P.M.	0.973	E	0.991	E	0.018	Y	0.978	E	0.005	N
Centinela Avenue @ Washington Place	99	A.M.	0.918	E	0.929	E	0.011	Y	0.861	D	-0.057	N
		P.M.	0.941	E	0.955	E	0.014	Y	0.879	D	-0.062	N
Culver Boulevard @ Main Street/Washington Boulevard	21	A.M.	1.084	F	1.091	F	0.007	N	1.091	F	0.007	N
		P.M.	0.881	D	0.885	D	0.004	N	0.885	D	0.004	N
Overland Avenue @ Culver Boulevard	100	A.M.	0.971	E	0.990	E	0.019	Y	0.901	E	-0.070	N
		P.M.	0.945	E	0.966	E	0.021	Y	0.913	E	-0.032	N
Sawtelle Boulevard @ Culver Boulevard	102	A.M.	0.889	D	0.897	D	0.008	N	0.825	D	-0.064	N
		P.M.	1.006	F	1.025	F	0.019	Y	0.932	E	-0.074	N
Sepulveda Boulevard @ Culver Boulevard	101	A.M.	0.993	E	1.003	F	0.010	Y	0.990	E	-0.003	N
		P.M.	0.926	E	0.937	E	0.011	Y	0.923	E	-0.003	N
Jefferson Boulevard @ Duquesne Avenue	165	A.M.	0.964	E	0.971	E	0.007	N	0.917	E	-0.047	N
		P.M.	0.976	E	0.987	E	0.011	Y	0.934	E	-0.042	N
Glencoe Ave./Costco Dr. @ Washington Boulevard	103	A.M.	0.678	B	0.679	B	0.001	N	0.679	B	0.001	N
		P.M.	0.968	E	0.969	E	0.001	N	0.969	E	0.001	N
Sepulveda Boulevard @ Green Valley Circle	166	A.M.	0.679	B	0.679	B	0.000	N	0.679	B	0.000	N
		P.M.	0.740	C	0.741	C	0.001	N	0.741	C	0.001	N
Hannum Avenue @ Playa Street	104	A.M.	0.869	D	0.897	D	0.028	Y	0.884	D	0.015	N
		P.M.	0.788	C	0.799	C	0.011	N	0.786	C	-0.002	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Hannum Avenue @ Slauson Avenue	105	A.M.	0.551	A	0.551	A	0.000	N	0.551	A	0.000	N
		P.M.	0.536	A	0.541	A	0.005	N	0.541	A	0.005	N
Sepulveda Boulevard @ I-405 NB Ramps S/O Venice Boulevard	156	A.M.	1.002	F	1.007	F	0.005	N	1.007	F	0.005	N
		P.M.	0.977	E	0.985	E	0.008	N	0.985	E	0.008	N
Sawtelle Boulevard @ I-405 SB Off-Ramp N/O Culver Boulevard	151	A.M.	0.495	A	0.499	A	0.004	N	0.499	A	0.004	N
		P.M.	0.481	A	0.485	A	0.004	N	0.485	A	0.004	N
Inglewood Boulevard @ Washington Boulevard	29	A.M.	0.808	D	0.818	D	0.010	N	0.781	C	-0.027	N
		P.M.	0.993	E	1.014	F	0.021	Y	0.974	E	-0.019	N
Jefferson Boulevard @ Overland Avenue	34	A.M.	1.006	F	1.035	F	0.029	Y	1.007	F	0.001	N
		P.M.	0.874	D	0.897	D	0.023	Y	0.870	D	-0.004	N
Jefferson Boulevard @ Sepulveda Boulevard (N)	35	A.M.	1.079	F	1.086	F	0.007	N	1.058	F	-0.021	N
		P.M.	0.986	E	0.996	E	0.010	Y	0.964	E	-0.022	N
Jefferson Boulevard @ Slauson Avenue	106	A.M.	0.577	A	0.591	A	0.014	N	0.591	A	0.014	N
		P.M.	0.654	B	0.691	B	0.037	N	0.691	B	0.037	N
La Cienega Boulevard @ Washington Boulevard	199	A.M.	1.032	F	1.034	F	0.002	N	1.034	F	0.002	N
		P.M.	0.816	D	0.817	D	0.001	N	0.817	D	0.001	N
Marina Freeway @ Slauson Avenue	107	A.M.	0.672	B	0.692	B	0.020	N	0.692	B	0.020	N
		P.M.	0.747	C	0.760	C	0.013	N	0.760	C	0.013	N
Sawtelle Boulevard @ Matteson Avenue/I-405 SB Ramps	148	A.M.	1.126	F	1.129	F	0.003	N	1.129	F	0.003	N
		P.M.	1.081	F	1.087	F	0.006	N	1.087	F	0.006	N
Motor Avenue @ Washington Boulevard	162	A.M.	1.004	F	1.006	F	0.002	N	1.006	F	0.002	N
		P.M.	0.922	E	0.931	E	0.009	N	0.931	E	0.009	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Overland Avenue @ Washington Boulevard	158	A.M.	1.011	F	1.020	F	0.009	N	1.020	F	0.009	N
		P.M.	1.213	F	1.221	F	0.008	N	1.221	F	0.008	N
Sepulveda Boulevard @ Playa Street/Jefferson Boulevard	60	A.M.	0.865	D	0.898	D	0.033	Y	0.877	D	0.012	N
		P.M.	0.925	E	0.953	E	0.028	Y	0.925	E	0.000	N
Redwood Avenue @ Washington Boulevard	108	A.M.	0.657	B	0.657	B	0.000	N	0.657	B	0.000	N
		P.M.	0.713	C	0.714	C	0.001	N	0.714	C	0.001	N
Sepulveda Boulevard @ Sawtelle Boulevard	170	A.M.	1.079	F	1.086	F	0.007	N	1.058	F	-0.021	N
		P.M.	0.986	E	0.996	E	0.010	Y	0.964	E	-0.022	N
Sawtelle Boulevard @ Venice Boulevard	62	A.M.	1.161	F	1.164	F	0.003	N	1.164	F	0.003	N
		P.M.	1.238	F	1.242	F	0.004	N	1.242	F	0.004	N
Sawtelle Boulevard @ Washington Boulevard	150	A.M.	0.771	C	0.775	C	0.004	N	0.775	C	0.004	N
		P.M.	0.981	E	0.987	E	0.006	N	0.987	E	0.006	N
Sawtelle Boulevard @ Washington Place	149	A.M.	0.906	E	0.907	E	0.001	N	0.907	E	0.001	N
		P.M.	1.072	F	1.075	F	0.003	N	1.075	F	0.003	N
Sepulveda Boulevard @ Slauson Avenue	65	A.M.	1.068	F	1.073	F	0.005	N	1.032	F	-0.036	N
		P.M.	1.029	F	1.042	F	0.013	Y	1.001	F	-0.028	N
Sepulveda Boulevard @ Venice Boulevard	66	A.M.	1.152	F	1.155	F	0.003	N	1.155	F	0.003	N
		P.M.	1.124	F	1.127	F	0.003	N	1.127	F	0.003	N
Sepulveda Boulevard @ Washington Boulevard	155	A.M.	0.891	D	0.898	D	0.007	N	0.898	D	0.007	N
		P.M.	1.026	F	1.035	F	0.009	N	1.035	F	0.009	N
Sepulveda Boulevard @ Washington Place	154	A.M.	1.027	F	1.029	F	0.002	N	1.029	F	0.002	N
		P.M.	1.107	F	1.113	F	0.006	N	1.113	F	0.006	N

Table 9-3

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Walgrove Avenue @ Washington Boulevard	167	A.M.	0.791	C	0.791	C	0.000	N	0.791	C	0.000	N
		P.M.	0.955	E	0.957	E	0.002	N	0.957	E	0.002	N
<b>City of Santa Monica</b>												
23rd Street @ Ocean Park Boulevard	133	A.M.	1.095	F	1.097	F	0.002	N	1.097	F	0.002	N
		P.M.	1.308	F	1.311	F	0.003	N	1.311	F	0.003	N
23rd Street @ Pico Boulevard	132	A.M.	0.730	C	0.732	C	0.002	N	0.732	C	0.002	N
		P.M.	0.988	E	0.990	E	0.002	N	0.990	E	0.002	N
26th Street @ Wilshire Boulevard	136	A.M.	0.952	E	0.953	E	0.001	N	0.953	E	0.001	N
		P.M.	0.970	E	0.970	E	0.000	N	0.970	E	0.000	N
4th Street @ Colorado Avenue	137	A.M.	0.692	B	0.692	B	0.000	N	0.692	B	0.000	N
		P.M.	0.902	E	0.903	E	0.001	N	0.903	E	0.001	N
4th Street @ Ocean Park Boulevard N	129	A.M.	0.471	A	0.473	A	0.002	N	0.473	A	0.002	N
		P.M.	0.551	A	0.552	A	0.001	N	0.552	A	0.001	N
4th Street @ Ocean Park Boulevard S	130	A.M.	0.454	A	0.455	A	0.001	N	0.455	A	0.001	N
		P.M.	0.493	A	0.495	A	0.002	N	0.495	A	0.002	N
4th Street @ Pico Boulevard	128	A.M.	1.031	F	1.035	F	0.004	N	1.035	F	0.004	N
		P.M.	1.021	F	1.023	F	0.002	N	1.023	F	0.002	N
4th Street @ Wilshire Boulevard	127	A.M.	0.659	B	0.660	B	0.001	N	0.660	B	0.001	N
		P.M.	0.726	C	0.726	C	0.000	N	0.726	C	0.000	N
Cloverfield Boulevard @ I-10 EB On-Ramp	138	A.M.	0.888	D	0.888	D	0.000	N	0.888	D	0.000	N
		P.M.	1.116	F	1.116	F	0.000	N	1.116	F	0.000	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Cloverfield Boulevard @ I-10 WB Off-Ramp	139	A.M.	0.951	E	0.953	E	0.002	N	0.953	E	0.002	N
		P.M.	0.919	E	0.920	E	0.001	N	0.920	E	0.001	N
Cloverfield Boulevard @ Ocean Park Boulevard	135	A.M.	0.727	C	0.729	C	0.002	N	0.729	C	0.002	N
		P.M.	0.819	D	0.823	D	0.004	N	0.823	D	0.004	N
Cloverfield Boulevard @ Pico Boulevard	134	A.M.	0.931	E	0.933	E	0.002	N	0.933	E	0.002	N
		P.M.	0.916	E	0.917	E	0.001	N	0.917	E	0.001	N
Lincoln Boulevard @ I-10 EB On-Ramp	168	A.M.	1.208	F	1.212	F	0.004	N	1.212	F	0.004	N
		P.M.	1.039	F	1.041	F	0.002	N	1.041	F	0.002	N
Lincoln Boulevard @ I-10 WB Off-Ramp	169	A.M.	0.971	E	0.971	E	0.000	N	0.971	E	0.000	N
		P.M.	1.138	F	1.141	F	0.003	N	1.141	F	0.003	N
Lincoln Boulevard @ Ocean Park Boulevard	109	A.M.	1.248	F	1.252	F	0.004	N	1.252	F	0.004	N
		P.M.	1.369	F	1.372	F	0.003	N	1.372	F	0.003	N
Lincoln Boulevard @ Pico Boulevard	124	A.M.	1.240	F	1.243	F	0.003	N	1.243	F	0.003	N
		P.M.	1.228	F	1.232	F	0.004	N	1.232	F	0.004	N
Lincoln Boulevard @ Wilshire Boulevard	131	A.M.	0.897	D	0.899	D	0.002	N	0.899	D	0.002	N
		P.M.	0.910	E	0.912	E	0.002	N	0.912	E	0.002	N
Main Street @ Ocean Park Boulevard	110	A.M.	0.958	E	0.958	E	0.000	N	0.958	E	0.000	N
		P.M.	1.022	F	1.023	F	0.001	N	1.023	F	0.001	N
Main Street @ Pico Boulevard	117	A.M.	0.775	C	0.775	C	0.000	N	0.775	C	0.000	N
		P.M.	0.945	E	0.945	E	0.000	N	0.945	E	0.000	N
Neilson Way @ Ocean Park Boulevard	111	A.M.	0.726	C	0.727	C	0.001	N	0.727	C	0.001	N
		P.M.	0.775	C	0.776	C	0.001	N	0.776	C	0.001	N

Table 9-3

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int. #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program				
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact	
Ocean Avenue @ Palisades Beach Road Ramps	126	A.M.	0.621	B	0.622	B	0.001	N	0.622	B	0.001	N	
		P.M.	0.958	E	0.959	E	0.001	N	0.959	E	0.001	N	
Ocean Avenue @ Wilshire Boulevard	125	A.M.	0.717	C	0.717	C	0.000	N	0.717	C	0.000	N	
		P.M.	0.684	B	0.684	B	0.000	N	0.684	B	0.000	N	
Ocean Avenue/Neilson Way @ Pico Boulevard	118	A.M.	0.729	C	0.730	C	0.001	N	0.730	C	0.001	N	
		P.M.	0.888	D	0.889	D	0.001	N	0.889	D	0.001	N	
<b>City of Inglewood</b>													
La Cienega Boulevard @ Arbor Vitae Street	5	A.M.	0.678	B	0.679	B	0.001	N	0.679	B	0.001	N	
		P.M.	0.731	C	0.734	C	0.003	N	0.734	C	0.003	N	
Centinela Avenue @ Florence Avenue	206	A.M.	0.613	B	0.622	B	0.009	N	0.622	B	0.009	N	
		P.M.	0.825	D	0.832	D	0.007	N	0.832	D	0.007	N	
La Brea Avenue @ Centinela Avenue	175	A.M.	1.395	F	1.412	F	0.017	Y	1.304	F	-0.091	N	
		P.M.	1.192	F	1.201	F	0.009	N	1.132	F	-0.060	N	
Florence Ave./Aviation Blvd. @ Manchester Boulevard	8	A.M.	1.143	F	1.147	F	0.004	N	1.117	F	-0.026	N	
		P.M.	0.887	D	0.921	E	0.034	Y	0.891	D	0.004	N	
La Brea Avenue @ Manchester Boulevard	188	A.M.	1.070	F	1.071	F	0.001	N	1.071	F	0.001	N	
		P.M.	1.123	F	1.124	F	0.001	N	1.124	F	0.001	N	
La Cienega Boulevard @ Manchester Boulevard	196	A.M.	0.899	D	0.902	E	0.003	N	0.902	E	0.003	N	
		P.M.	0.940	E	0.942	E	0.002	N	0.942	E	0.002	N	
<b>South Bay Cities<sup>b</sup></b>													
Sepulveda Boulevard/PCH @ Artesia Boulevard	208	A.M.	0.869	D	0.873	D	0.004	N	0.873	D	0.004	N	
		P.M.	1.220	F	1.222	F	0.002	N	1.222	F	0.002	N	



**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int. #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Aviation Boulevard @ Rosecrans Avenue	9	A.M.	1.001	F	1.003	F	0.002	N	1.003	F	0.002	N
		P.M.	1.064	F	1.064	F	0.000	N	1.064	F	0.000	N
Douglas Street @ Imperial Highway	176	A.M.	0.770	C	0.771	C	0.001	N	0.771	C	0.001	N
		P.M.	0.590	A	0.593	A	0.003	N	0.593	A	0.003	N
Sepulveda Boulevard @ El Segundo Boulevard	23	A.M.	1.074	F	1.076	F	0.002	N	1.076	F	0.002	N
		P.M.	1.297	F	1.303	F	0.006	N	1.303	F	0.006	N
Sepulveda Boulevard @ Grand Avenue	120	A.M.	1.026	F	1.034	F	0.008	N	1.034	F	0.008	N
		P.M.	1.305	F	1.310	F	0.005	N	1.310	F	0.005	N
Highland Avenue @ Manhattan Beach Boulevard	207	A.M.	0.787	C	0.790	C	0.003	N	0.790	C	0.003	N
		P.M.	0.620	B	0.621	B	0.001	N	0.621	B	0.001	N
I-405 NB Ramps @ Imperial Highway	181	A.M.	0.415	A	0.416	A	0.001	N	0.416	A	0.001	N
		P.M.	0.497	A	0.498	A	0.001	N	0.498	A	0.001	N
I-105 WB Off-Ramp/Nash St. @ Imperial Highway	183	A.M.	0.796	C	0.799	C	0.003	N	0.799	C	0.003	N
		P.M.	0.425	A	0.427	A	0.002	N	0.427	A	0.002	N
Main Street @ Imperial Highway	182	A.M.	1.007	F	1.011	F	0.004	N	1.011	F	0.004	N
		P.M.	0.904	E	0.906	E	0.002	N	0.906	E	0.002	N
Sepulveda Boulevard @ Manhattan Beach Boulevard	122	A.M.	1.189	F	1.193	F	0.004	N	1.193	F	0.004	N
		P.M.	1.335	F	1.337	F	0.002	N	1.337	F	0.002	N
Sepulveda Boulevard @ Maple Avenue	119	A.M.	0.827	D	0.831	D	0.004	N	0.831	D	0.004	N
		P.M.	1.075	F	1.078	F	0.003	N	1.078	F	0.003	N
Sepulveda Boulevard @ Marine Avenue	121	A.M.	1.103	F	1.105	F	0.002	N	1.105	F	0.002	N
		P.M.	1.330	F	1.332	F	0.002	N	1.332	F	0.002	N

**Table 9-3**

**THE VILLAGE AT PLAYA VISTA PROJECT  
INTERSECTION OPERATING CONDITIONS—FUTURE 2010 WITH PROJECT &  
UPDATED MITIGATIONS—NO PLAYA VISTA DRIVE BRIDGE BASELINE**

Intersection	Int . #	Peak Hour	2010 Base		2010 with Project				2010 with Project and Mitigation Program			
			V/C	LOS	V/C	LOS	V/C Increase	Signif. Impact	V/C	LOS	V/C Increase	Residual Impact
Sepulveda Boulevard @ Mariposa Avenue	58	A.M.	0.898	D	0.901	E	0.003	N	0.901	E	0.003	N
		P.M.	1.074	F	1.077	F	0.003	N	1.077	F	0.003	N
Sepulveda Boulevard @ Rosecrans Avenue	61	A.M.	1.020	F	1.023	F	0.003	N	1.023	F	0.003	N
		P.M.	1.397	F	1.400	F	0.003	N	1.400	F	0.003	N
Vista del Mar/Highland Ave. @ Rosecrans Avenue	25	A.M.	1.278	F	1.281	F	0.003	N	1.281	F	0.003	N
		P.M.	0.893	D	0.897	D	0.004	N	0.897	D	0.004	N
Total Number of Intersections at LOS E or F		A.M.		86		92				84		
		P.M.		103		108				102		
Number of Intersections with Significant Impacts		A.M.						31				0
		P.M.						48				0

<sup>a</sup> Intersection controlled by Stop signs along the minor street approaches.

<sup>b</sup> South Bay cities include El Segundo, Manhattan Beach, Hawthorne, and Hermosa Beach.

Source: Kaku Associates and Raju Associates, March 2004.

Table 9-4

SUMMARY OF THE PLAYA VISTA DRIVE BRIDGE AND NO PLAYA VISTA DRIVE BRIDGE SCENARIOS

Intersection	Peak Hour	DEIR 2010 with PV Bridge No Project <sup>a</sup>	Appendix to DEIR 2010 No PV Bridge No Project <sup>b</sup>	DEIR with Bridge Project & Mitigation <sup>c</sup>	2010 No PV Bridge with Project with Mitigation (No New Mitigation Measure) <sup>d</sup>	2010 No PV Bridge with Project with Mitigation with New Mitigation Measure <sup>e</sup>					
12th St. (Campus Center Dr @ Teale Street/Bluff Creek Dr	A.M.	.327	A	.336	A	.393	A	.401	A	.651	B
	P.M.	.415	A	.421	A	.525	A	.529	A	.675	B
Alla Rd. @ Jefferson Bl	A.M.	.550	A	.722	C	.584	A	.755	C	.755	C
	P.M.	.468	A	.525	A	.512	A	.563	A	.563	A
Playa Vista Drive @ B Street	A.M.	.382	A	N/A	N/A	.388	A	N/A	N/A	N/A	N/A
	P.M.	.337	A	N/A	N/A	.344	A	N/A	N/A	N/A	N/A
Beethoven @ Jefferson	A.M.	.370	A	.520	A	.402	A	.552	A	.552	A
	P.M.	.367	A	.495	A	.402	A	.530	A	.530	A
Centinela @ Culver	A.M.	.892	D	.916	E	.839	D	.889	D	.889	D
	P.M.	.850	D	.857	D	.845	D	.867	D	.867	D
Centinela @ Jefferson	A.M.	.656	B	1.070	F	.728	C	1.141	F	.863	D
	P.M.	.747	C	.883	D	.837	D	.968	E	.840	D
Centinela @ Marina Fwy EB Ramps	A.M.	.398	A	.450	A	.462	A	.506	A	.506	A
	P.M.	.566	A	.671	B	.615	B	.707	C	.707	C
Centinela @ Marina Fwy WB Ramps	A.M.	.478	A	.592	A	.497	A	.611	B	.611	B
	P.M.	.449	A	.534	A	.470	A	.565	A	.565	A
Mesmer Av. @ Centinela Av	A.M.	.438	A	.444	A	.457	A	.462	A	.462	A
	P.M.	.406	A	.413	A	.447	A	.453	A	.453	A
Centinela Av @ Short Av	A.M.	.643	B	.680	B	.655	B	.693	B	.693	B
	P.M.	.634	B	.634	B	.653	B	.653	B	.653	B
Bluff Creek Dr @ Centinela Av	A.M.	.474	A	.484	A	.512	A	.522	A	.557	A
	P.M.	.591	A	.609	B	.698	B	.674	B	.653	B
Inglewood Bl @ Culver Bl	A.M.	.798	C	.828	D	.661	B	.681	B	.681	B
	P.M.	.979	E	.966	E	.824	D	.821	D	.821	D
Culver Bl @ Jefferson Bl	A.M.	.817	D	.802	D	.807	D	.793	C	.793	C
	P.M.	.807	D	.806	D	.801	D	.799	C	.799	C

Table 9-4

SUMMARY OF THE PLAYA VISTA DRIVE BRIDGE AND NO PLAYA VISTA DRIVE BRIDGE SCENARIOS

Intersection	Peak Hour	DEIR 2010 with PV Bridge No Project <sup>a</sup>	Appendix to DEIR 2010 No PV Bridge No Project <sup>b</sup>	DEIR with Bridge Project & Mitigation <sup>c</sup>	2010 No PV Bridge with Project with Mitigation (No New Mitigation Measure) <sup>d</sup>	2010 No PV Bridge with Project with Mitigation with New Mitigation Measure <sup>e</sup>			
Culver Bl @ Marina Exwy EB Ramps	A.M.	.785	C	.715	C	.715	C	.715	C
	P.M.	.621	B	.618	B	.623	B	.625	B
Culver Bl @ Marina Exwy WB Ramps	A.M.	1.082	F	.832	D	1.084	F	.833	D
	P.M.	1.033	F	.864	D	1.042	F	.873	D
Playa Vista Dr @ Culver Bl	A.M.	.678	B	N/A	N/A	.678	B	N/A	N/A
	P.M.	.474	A	N/A	N/A	.478	A	N/A	N/A
Lincoln Bl Ramp @ Culver Bl (Southeast)	A.M.	.521	A	.513	A	.521	A	.513	A
	P.M.	.228	A	.227	A	.228	A	.227	A
Sepulveda Bl @ Howard Hughes Pkwy	A.M.	.962	E	.968	E	.938	E	.944	E
	P.M.	.953	E	.969	E	.957	E	.973	E
I-405 NB Ramps @ Jefferson Bl	A.M.	.835	D	.908	E	.783	C	.877	D
	P.M.	1.313	F	1.362	F	1.114	F	1.163	F
I-405 SB Ramps @ Jefferson Bl	A.M.	.678	B	.769	C	.677	B	.768	C
	P.M.	.761	C	.811	D	.763	C	.830	D
Inglewood Bl /Centinela Av @ Jefferson Bl	A.M.	.833	D	.884	D	.831	D	.882	D
	P.M.	.789	C	.826	D	.805	D	.845	D
Lincoln Bl @ Jefferson Bl	A.M.	.991	E	.997	E	.988	E	.995	E
	P.M.	1.051	F	1.053	F	1.060	F	1.062	F
McConnell Av @ Jefferson Bl (Stop Sign Intersection)	A.M.	95.4	F	304.5	F	.451	A	.591	A
	P.M.	696.2	F	800	F	.385	A	.513	A
Mesmer Av @ Jefferson Bl	A.M.	.416	A	.468	A	.442	A	.494	A
	P.M.	.464	A	.501	A	.517	A	.551	A
Playa Vista Dr @ Jefferson Bl	A.M.	.661	B	.619	B	.687	B	.649	B
	P.M.	.715	C	.581	A	.744	C	.596	A
Westlawn Av @ Jefferson Bl	A.M.	.447	A	.583	A	.499	A	.635	B
	P.M.	.473	A	.594	A	.572	A	.674	B

**Table 9-4**

**SUMMARY OF THE PLAYA VISTA DRIVE BRIDGE AND NO PLAYA VISTA DRIVE BRIDGE SCENARIOS**

<b>Intersection</b>	<b>Peak Hour</b>	<b>DEIR 2010 with PV Bridge No Project<sup>a</sup></b>		<b>Appendix to DEIR 2010 No PV Bridge No Project<sup>b</sup></b>		<b>DEIR with Bridge Project &amp; Mitigation<sup>c</sup></b>		<b>2010 No PV Bridge with Project with Mitigation (No New Mitigation Measure)<sup>d</sup></b>		<b>2010 No PV Bridge with Project with Mitigation with New Mitigation Measure<sup>e</sup></b>	
Lincoln Bl @ Bluff Creek Dr	A.M.	.710	C	.710	C	.730	C	.730	C	.730	C
	P.M.	.868	D	.874	D	.884	D	.893	D	.893	D
McConnell Av @ Bluff Creek Dr	A.M.	N/A	N/A	N/A	N/A	.310	A	.315	A	.315	A
	P.M.	N/A	N/A	N/A	N/A	.455	A	.485	A	.485	A
Playa Vista Dr @ Bluff Creek Dr	A.M.	.439	A	.439	A	.473	A	.473	A	.473	A
	P.M.	.549	A	.563	A	.599	A	.613	B	.613	B
Sepulveda Bl @ Centinela Av	A.M.	1.230	F	1.240	F	1.159	F	1.169	F	1.169	F
	P.M.	1.185	F	1.201	F	1.192	F	1.208	F	1.208	F
Sawtelle Bl @ Culver Bl	A.M.	.889	D	.889	D	.825	D	.825	D	.825	D
	P.M.	1.027	F	1.006	F	.932	E	.932	E	.932	E
Sawtelle Bl @ I-405 SB Off Ramp n/o Culver Bl	A.M.	.495	A	.495	A	.499	A	.499	A	.499	A
	P.M.	.494	A	.481	A	.499	A	.485	A	.485	A

<sup>a</sup> Draft EIR Appendix K-2.

<sup>b</sup> Draft EIR Appendix K-2.

<sup>c</sup> Draft EIR Appendix K-2.

<sup>d</sup> Draft EIR Appendix K-2.

<sup>e</sup> Final EIR Appendix G-1.

---

### **III. MITIGATION MONITORING AND REPORTING PROGRAM**

#### **1.0 INTRODUCTION**

---

As of January 1, 1989, the California Environmental Quality Act (CEQA) requires a Mitigation Monitoring and Reporting Program (MMRP) for projects where mitigation measures are a condition of their approval and development. This program has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6. The Environmental Impact Report (EIR) for the Village at Playa Vista Project as described in the project description identifies the significant environmental impacts associated with the Project and specifies a series of measures designed to mitigate adverse impacts to the environment. The MMRP describes the procedures the Applicant will use to implement the mitigation measures adopted in connection with the approval of the project and the methods of monitoring and reporting on such actions. Monitoring refers to the observation of mitigation activities at the Project site, in the design of plans or in the operation of designated agencies. A Monitoring/Reporting Program is necessary only for impacts which would be significant if not mitigated.

The Project Applicant shall be obligated to provide documentation to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.

#### **1.1 PURPOSE**

As stated above, this MMRP has been prepared in conformance with CEQA, Public Resources Code Section 21081.6. The intent of this program is to:

1. Verify satisfaction of the required mitigation measures of the EIR;
2. Provide a methodology to document implementation of the required mitigation;
3. Provide a record of the Monitoring and Reporting Program;
4. Identify monitoring and enforcement agencies;
5. Establish administrative procedures for the clearance of mitigation measures;
6. Establish the frequency and duration of monitoring and reporting; and

7. Utilize the City's existing review processes wherever feasible.

## 1.2 ADMINISTRATIVE PROCEDURES

Mitigation monitoring reports shall be submitted to the City of Los Angeles on an annual basis. Annual monitoring reports shall be submitted on or before March 31 of each calendar year following certification of the EIR, and continuing until the mitigation program is complete. Reports required more frequently than annually shall be submitted as required and included in the annual reports. Records and documentation of compliance shall be maintained by the Project Applicant and submitted to the City as appendices to the annual monitoring reports. All associated reports and documentation shall be open for inspection by the Project Applicant, the public, responsible agencies, and other interested parties.

The City's existing planning, engineering, review and inspection processes shall be used as the basic foundation for MMRP procedures, and shall also serve to provide the documentation for the reporting program. Since these processes address many complex issues, the Project Mitigation Monitor shall distill and separate this information into an annual summary report with technical appendices which shall be delivered to the City.

Reporting consists of establishing a record that a mitigation measure is being implemented. This will involve the following steps:

1. All monitoring reports shall be issued to the City of Los Angeles Department of City Planning.
2. Reports shall be issued annually on or before March 31 to cover the prior calendar year following EIR certification in a form and format approved by the City Planning Director.
3. Evidence such as verification forms, letters, signatures, and initials, shall be maintained as an appendix to annual reports.
4. Annual reports and appendices shall be on file in the City Planning Department.
5. All reporting forms indicating non-compliance with any required mitigation measure of the EIR shall be issued by the Mitigation Monitor within five working days of discovery to the designated City Enforcement and Monitoring Agencies and the City Planning Department with a copy to the property owner/Project Applicant or authorized representative.

6. Remedial actions to correct non-compliance shall extend monitoring and reporting as necessary to demonstrate compliance. Remedial action reports shall be issued to the applicable Enforcement and Monitoring Agencies and the City Planning Department within 10 days of completion of such remedial action.
7. The mitigation monitor shall afford the City Planning Department with the opportunity to meet on a periodic basis, no less frequently than monthly, to be informally apprised of the status of the Project's compliance with the MMRP and any material information on reporting forms generated since the last previous such meeting as the Director of Planning may request.

### **1.3 MONITORING PROCEDURES**

The Proposed Project development process generally falls into the following phases relevant to the MMRP:

1. Pre-construction;
2. Construction; and
3. Post-construction.

Directly related to these phases of development are the following implementation mechanisms:

1. The incorporation of mitigation measures into subdivision conditions;
2. The incorporation of mitigation measures into project design;
3. The incorporation of mitigation measures into construction contracts; and
4. The incorporation of mitigation measures into administrative action.

Mitigation measures such as building setback restrictions and landscaping requirements are made conditions of tentative map approval and must be cleared before a final map can be recorded. Mitigation measures such as highway design, plumbing specifications and sewer programs provide requirements for the design of the project. This type of mitigation measure is generally implemented through the incorporation of the mitigation measure into the project design.



Mitigation measures such as truck hauling route restrictions, dust control methodology and work hour restrictions provide guidance for the construction phase of the project. This type of mitigation measure is generally implemented through the incorporation of the mitigation requirement into the language of the construction contract documents.

Recommendations for ongoing traffic management, landscape irrigation and recycling programs are examples of mitigation measures that require administrative action to implement during the life of the Project. This type of mitigation measure is often implemented through administrative action in operation contracts, leases, creation of associations and covenants and agreements. These types of mitigation measures often require continuous implementation.

Generally, the monitoring of the implementation of mitigation measures occurs during and at the completion of the implementation phase, prior to the commencement of the next phase of the development process. For example, those mitigation measures implemented in the design phase of the project shall be monitored during and at the end of the design phase, prior to commencement of the construction phase of development. Those measures implemented in the construction phase through the incorporation of mitigation measures into construction contract documents are monitored prior to the start of construction activities and during the construction activities. Prior to the start of construction activities, a monitoring check shall be completed to assure that the contract documents include all necessary mitigation provisions. The on-site monitoring of mitigation measures shall also occur during the construction activities. Construction phase project monitoring checklists and signature sheets shall be utilized by construction managers and foremen to assure that appropriate implementation, as well as timely monitoring, have taken place.

The timing of monitoring for mitigation measures to be implemented through administrative action will vary depending on the nature of the measure.

Actions indicating compliance with mitigation measures are identified for each measure; however, compliance may be demonstrated through alternative means, subject to the approval of the monitoring and enforcement agencies. Where multiple actions indicating compliance are identified, compliance with any one of the actions shall be deemed satisfactory.

#### **1.4 MONITOR/MONITORING TEAM**

Monitoring reports shall be prepared by a designated Monitor retained by the Applicant in consultation with professionals corresponding to the mitigation measure being monitored. The designated Monitor would be a specific individual or a firm. Individual technicians or Monitors shall not submit reports to the City directly. They shall be collected by the designated Project

Mitigation Monitor and submitted to the City as part of a complete Annual Mitigation Monitoring Report or monthly if applicable.

## **1.5 ENFORCEMENT**

Under CEQA, the ultimate discretion and responsibility for making determinations with respect to potential environmental effects rests with the lead agency rather than the Monitor or preparer of the EIR.

These MMRP provisions under CEQA do not grant monitors or agencies any additional police powers to enforce compliance with mitigation measures. The MMRP is an informational document upon which the City of Los Angeles, its departments, and Agencies may act to enforce compliance. The Project Mitigation Monitor shall act as a reporter of information on compliance based on the terms set forth in this MMRP.

If a failure to mitigate or comply with mitigation measures is reported by the Project Mitigation Monitor, the City in its respective jurisdiction, may act to require correction of such failure, but in no case shall the Project Mitigation Monitor have the authority nor obligation to enforce the mitigation set forth herein.

The City and other Enforcement Agencies may not require the use of alternative means to mitigate adverse effects of the Project unless such requirements are provided for in the EIR or the conditions of Project approval.

## **1.6 IMPLEMENTATION OF MITIGATION MEASURES FOR OFF-SITE IMPROVEMENTS**

The impact analysis of the Environmental Topics in the EIR include an analysis of the secondary impacts of implementation of off-site infrastructure improvements identified in the mitigation sections of the EIR. These analyses identify mitigation measures that would reduce environmental effects arising from construction and operation of those improvements.

The traffic mitigation measures include an identification of the jurisdiction in which each traffic mitigation measure is located. All traffic mitigation measures within the City of Los Angeles shall be completed to the satisfaction of the LADOT. All traffic mitigation measures in jurisdictions other than the City of Los Angeles shall be coordinated and monitored through LADOT and implemented to the extent feasible.

Therefore, this MMRP also includes mitigation measures to advise agencies outside of the City of Los Angeles of the anticipated secondary effects, and recommended mitigation measures to reduce impacts from their implementation.<sup>6</sup>

## 1.7 ATTACHMENTS

In order to provide supplemental information and to facilitate an easier read, where the mitigation measures reference portions of the Village at Playa Vista EIR, these references are included as attachments in this MMRP.

## 1.8 PROGRAM MODIFICATION

After review and approval by the lead agency, minor changes to the Mitigation Monitoring and Reporting Program are permitted but can be only made by the Applicant with the approval of the City Director of Planning. This flexibility is necessary in light of the prototypical nature of the MMRP and the need to protect the environment with a workable program. No changes shall be permitted unless the MMRP continues to satisfy the requirements of Section 21081.6 of CEQA as determined by the City Planning Director.

---

<sup>6</sup> Under CEQA Section 15091(a)(2), a Lead Agency may approve a project with significant impacts, if there is a finding that "...changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding...[and that] such changes have been adopted by such other agency or can and should be adopted by such other agency."

---

### III. MITIGATION MONITORING AND REPORTING PROGRAM

#### 2.0 MITIGATION BY ENVIRONMENTAL TOPIC

---

#### A. EARTH

#### Mitigation Measures for the Proposed Project and the Equivalency Program

#### Slope Stability

- A-1** Prior to completion of the Riparian Corridor, slope stability remedial measures shall be implemented as appropriate for the areas of potential instability below Cabora Road in accordance with the Group Delta Consultants (GDC) bluff stabilization final assessment report dated December 3, 2001 (revised January 31, 2002) and approved by the City of Los Angeles Department of Public Works on February 19, 2002. Identification of areas having the potential for slope stability problems is shown in the GDC report and completion of the appropriate mitigation (slope stability remedial) measures shall be subject to approval of the Department of Public Works. Completion of the slope repair shall be monitored by a qualified engineer subject to approval of the Department of Public Works.

In accordance with the recommendations of the GDC report, the following slope repair methods would be employed as appropriate to minimize the potential for slope failures in areas of potential instability. The applicable locations of each repair type is shown within the GDC report, and that same information is also shown on Attachment A of this MMRP.

- *Type 1: Full Slope Height Fill* – The affected portions of the slope would be cut back in benches, a minimum of one equipment width into dense native soil with a 2-foot deep key at the toe. The removed material would be replaced with material having a minimum cohesion of 200 pounds per square foot (psf) and effective angle of internal friction of 30°, with a slope grade of 1.5:1 (H:V).
- *Type 2: Partial Slope Height Fill* – A portion of the slope height would be cut back into dense native soil and filled with material having a minimum cohesion of 200 psf and effective angle of internal friction of 30°, in lifts of 8-inches or less in thickness. The slope grade would match the surrounding grade of 1.5:1 (H:V) or flatter.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of “B” or grading permit; once during construction below Cabora Road

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of “B” or grading permits; execution of grading contract with mitigation measure provisions

**A-2** A soil erosion resistant matting shall be used in the Proposed Project site for the portion of the slope below Cabora Road to reduce the accumulation of soil debris.

**Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once during construction adjacent to Carbora Road.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of “B” permit or Grading Permit for Bluff Restoration.

**A-3** Permanent erosion control features (i.e., rip-rap, concrete steps, stones) shall be installed at all stormwater discharge points within the southern portion of the Proposed Project site in a manner satisfactory to the City of Los Angeles’ Department of Building and Safety and/or Department of Public Works, as appropriate.

**Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of “B” or grading permit; once at final inspection

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of “B” or building permit; acceptance of improvements.

## Other

**A-4** All dewatering shall be conducted in accordance with the requirements of permits obtained from the appropriate permitting agency(ies) (i.e., NPDES permits obtained from the Regional Water Quality Control Board and/or Industrial Waste Discharge Permits obtained from the City of Los Angeles Department of Public Works). Prior to initiating any dewatering activities that are not included within the scope of permit provisions, the Applicant/Contractor must update the plans and provisions related to the permit and must notify the Regional Water Quality Control Board and/or City Department of Public Works, as applicable, of any such plan/provision modifications.

**Enforcement Agency:** Regional Water Quality Control Board, Los Angeles City, Department of Public Works, as Applicable

**Monitoring Agency:** Regional Water Quality Control Board, Los Angeles City, Department of Public Works, as Applicable

**Monitoring Phase:** Construction

**Monitoring Frequency:** As necessary if dewatering is required

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of National Pollution Discharge Elimination System or Industrial Waste Discharge permits.

**A-5** Prior to the issuance of grading permits or “B” permits for initial site preparation, a pest control firm shall be retained to conduct and implement a rodent control program to prevent the migration of rodents or pest to neighboring properties. The rodent control program shall comply with all applicable local, state and federal regulations. Evidence shall be provided to the advisory agency prior to the issuance of any permit that this provision has been satisfied.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of “B” or grading permit

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of demolition and grading permits; contract or retainer with pest control firm; rodent control program prepared by a pest control firm.

## B. AIR QUALITY

### Mitigation Measures for the Proposed Project and the Equivalency Program

#### a. Playa Vista Air Quality Management Plan (Playa Vista AQMP)

**B-1** Prior to the issuance of any grading or building permits, the Playa Vista AQMP shall be prepared satisfactory to the Planning Department. The Playa Vista AQMP shall identify specific emission reduction/mitigation measures addressing the air quality impacts associated with construction and operations of the Proposed Project, such as construction mitigation measures addressing emissions from heavy-duty construction equipment, fugitive dust, construction deliveries, construction worker travel and the application of architectural coatings; as well as operational mitigation measures addressing emissions from utility consumption, building maintenance, and service and support facilities. The Plan shall implement proactively the strategies called for in the regional Air Quality Management Plan as prepared by the SCAQMD through:

- Implementation of emission control strategies based on currently available and cost-effective technology, and
- Providing the means by which future technological advances can be incorporated in the development of the Playa Vista Project.

**Enforcement Agency:** Los Angeles City, Department of City Planning.

**Monitoring Agency:** Los Angeles City, Department of City Planning.

**Monitoring Phase:** Pre-Construction.

**Monitoring Frequency:** Prior to issuance of any grading or building permits.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or building permits; approval of Playa Vista AQMP with applicable emission reduction mitigation measures.

#### b. Monitoring the Playa Vista AQMP

**B-2** Prior to the issuance of any grading/building permit, an Air Quality Monitor, satisfactory to the Director of Planning shall be retained by the Applicant to document compliance with the Playa Vista AQMP. During the Project's construction phase and operational phase, until the Project's buildout, the Monitor shall review all activities occurring on the Project site on a periodic basis and maintain current records on compliance with the Playa Vista AQMP. The Monitor shall submit monthly reports during Project construction, and annual reports during Project operations, until the Project's buildout, documenting compliance with all air emission control measures contained in the Playa

Vista AQMP. The records and reports shall be maintained as public documents. The Monitor's identification, qualifications, address and phone number shall be listed in all construction and construction-related contracts and shall be placed in the pertinent files of the Planning Department.

**Enforcement Agency:** Los Angeles City, Department of City Planning.

**Monitoring Agency:** Los Angeles City, Department of City Planning.

**Monitoring Phase:** Pre-Construction, Construction, and Post-Construction.

**Monitoring Frequency:** Air Quality Monitor: Prior to issuance of any grading or building permits, Construction Monitoring: Monthly during construction activities. Operations Monitoring: Annually during Project operations, until the Project's buildout.

**Action Indicating Compliance with Mitigation Measure(s):** Air Quality Monitor: Contract with Monitor; submission of Monitor's appointment to Planning Department. Construction Monitoring: Monthly monitoring reports. Operations Monitoring: Annual monitoring reports, until the Project's buildout.

### c. Remedial Action

- B-3** The Applicant shall require in all construction and construction-related contracts, provisions requiring compliance with all applicable environmental conditions included in all relevant entitlement approval actions of the City.

**Enforcement Agency:** Los Angeles City, Department of City Planning.

**Monitoring Agency:** Los Angeles City, Department of City Planning.

**Monitoring Phase:** Pre-Construction.

**Monitoring Frequency:** Execution of grading or construction contract.

**Action Indicating Compliance with Mitigation Measure(s):** Execution of grading or construction contracts with mitigation measure provisions.

- B-4** Upon identification of any instance of non-compliance with the Playa Vista AQMP, the Monitor shall within 48 hours notify the Applicant and the designated representative of the Planning Department, or other appropriate enforcement and monitoring agency. All of the Applicant's applicable contracts shall require corrective actions within 48 hours to attain compliance. Once notified of a condition of non-compliance, the Applicant shall promptly act to attempt to attain compliance. In the event that a contractor, subcontractor or operator fails to correct the noticed noncompliance, the Applicant, its representative or prime contractor shall retain the contractual right to effect prompt corrective action. Should remedial action not occur, the Director of Planning, or other



City enforcement and monitoring agencies, are empowered to issue cease and desist orders.

**Enforcement Agency:** Los Angeles City, Department of City Planning.

**Monitoring Agency:** Los Angeles City, Department of City Planning.

**Monitoring Phase:** Construction.

**Monitoring Frequency:** Ongoing during construction.

**Action Indicating Compliance with Mitigation Measure(s):** Execution of grading or construction contracts with mitigation measure provisions.

#### **d. Emission Control Strategies**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

#### **(1) Tier 1 Mitigation Measures**

#### **B-5 (a) Construction Emissions**

##### **(i) Construction Equipment/Operation**

- a. Control Technologies: Apply NO<sub>x</sub> control technologies, such as fuel injection timing retard for diesel engines and air-to-air after cooling, as feasible.
- b. Low Emission Equipment and Technologies: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.
- c. Configure construction parking to minimize traffic interference.
- d. Develop a construction traffic management plan that includes, but is not limited to:
  - Providing temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).
  - Scheduling of construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
  - Rerouting construction trucks off congested streets.
  - Consolidating truck deliveries.

- Providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
  - Prohibit truck idling in excess of two minutes, whenever practical.
- e. Where possible use electricity from power lines rather than temporary generators.
- f. Construction Practices: Use only well maintained equipment, utilize proper planning to reduce rework and multiple handling of earth materials, select equipment that is properly sized to minimize trips/use, consolidate deliveries, and maximize off-site construction (i.e. prefabricating and prepainting).
- g. Record Keeping: Log fuel use, hours of operation and periodic maintenance of all construction equipment to ensure proper maintenance.
- h. Use ultra low-emission vehicles (ULEVs), zero emission vehicles (ZEVs), or other low emission support vehicles and equipment, including fleet vehicles if any, to the extent cost effective and feasible.

**(ii) Fugitive Dust**

- i. For disturbed dirt areas which remain inactive over an extended period of time, soil stabilization measures shall be undertaken such as application of moisture retaining binders which pull moisture out of the air to form a cohesive soil binder.
- j. Replace ground cover in disturbed areas as quickly as possible.
- k. During dry weather, enclose, cover, water twice daily or apply non-toxic soil binders according to manufacturers' specifications, to exposed piles (i.e., gravel, sand, dirt) with 5% or greater silt content.
- l. Water active grading/construction sites at least twice daily, or as needed during wet weather.
- m. Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- n. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Section 23114.

- o. Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads. Water sweepers shall use reclaimed water, where available.
- p. Apply water up to three times daily or as necessary, to all unpaved parking or staging areas or unpaved road surfaces, during dry weather.
- q. Limit traffic speeds on all unpaved roads to 25 mph or less.
- r. Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extending for a centerline distance of at least 100 feet and a width of at least 20 feet.
- s. Other Dust Controls: Any intensive dust generating activity, such as abrasive blasting, drilling, and grinding must be controlled to the greatest extent feasible. Such control would necessarily be specific to the activity, but could include the use of screens or enclosures, water sprays or collection devices.
- t. Comply with the requirements of Air Quality Management District (AQMD) Rule 403 to the extent not provided above.

**(iii) Construction Worker Travel**

- u. All contractors shall be required to participate in a common carpool registry which provides a list of construction workers willing to carpool during all periods of contract performance. This registry shall be maintained by the Applicant and reviewed by the Monitor.

**(iv) Building Materials and Architectural Coatings**

- v. Building materials, architectural coatings and cleaning solvents used must comply with all applicable SCAQMD rules and regulations. Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.

**Enforcement Agency:** Los Angeles City, Department of City Planning, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of City Planning, Department of Building and Safety

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at first final map recordation.

**Action Indicating Compliance with Mitigation Measure(s):** Air quality plan approval; map recordation.

**(b) Post-Construction Operations Emissions**

**(i) Service and Support Facilities (point sources)**

**B-6** All point source facilities shall obtain all required permits from the SCAQMD. The issuance of these permits by the SCAQMD will require the operators of these facilities to implement Best Available Control Technology and other required measures that reduce emissions of criteria air pollutants.

**Enforcement Agency:** South Coast Air Quality Management District

**Monitoring Agency:** South Coast Air Quality Management District

**Monitoring Phase:** Pre-Construction, Post-Construction

**Monitoring Frequency:** Once at issuance of Southern California Air Quality Management District (SCAQMD) permit.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of SCAQMD permits.

**(ii) Natural Gas Consumption and Electricity Production**

**B-7** Adherence to the following energy consumption measures shall be made an element of the Playa Vista AQMP if deemed acceptable to the Department of Building and Safety.

- a. All residential buildings shall be equipped with Energy-Star rated appliances, to the extent feasible.
- b. All residential and non-residential buildings shall exceed the California Title 24 Energy Efficiency standards for water heating, space heating and cooling, to the extent feasible.
- c. Energy efficient lighting fixtures, which exceed the California Title 24 Energy Efficiency standards to the extent feasible, shall be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are not needed shall also be used to regulate lighting for interior office common spaces, such as conference rooms and bathrooms.
- d. All fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed. Exterior lighting fixtures as might be specified by the Department of Water and Power as energy

efficient shall be used to the extent such lighting is available and architecturally acceptable.

- e. All residential and commercial buildings shall be equipped with electric vehicle charging stations to the extent required by the California Air Resources Board (ARB) at the time of construction of the given building.
- f. Shade producing trees shall be planted at the Proposed Project site to the extent feasible to provide localized as well as overall community cooling.
- g. All buildings shall employ passive heating and cooling design strategies to the extent feasible.
- h. All buildings shall be designed to accommodate renewable energy sources, to the extent feasible.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Planning Department

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Planning Department

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of building permit; once at issuance of a temporary or permanent Certificate of Occupancy.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permit; issuance of temporary or permanent Certificate of Occupancy.

### (iii) Building Materials and Architectural Coatings

- B-8** Building materials, architectural coatings and cleaning solvents shall comply with all applicable SCAQMD rules and regulations. Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at issuance of building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permit.

**(iv) Public Information Program**

**B-9** The Applicant or successor shall circulate or cause to be circulated a semi-annual or more frequent newsletter to all on-site residents, businesses and employees to provide information on carpool incentives, internal shuttle system routes and schedules, on-site housing and job opportunities for on-site employees and residents, and mandatory or voluntary new technologies for air pollution reduction in businesses and homes.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Post-Construction

**Monitoring Frequency:** Semi-annually

**Action Indicating Compliance with Mitigation Measure(s):** Semi-annual newsletter.

**(2) Tier II Post-Construction Mitigation Measures****(a) Implementation of New Technology**

The following Tier II mitigation measures apply to both Project construction and operations, until Project buildout.

**B-10** The Applicant or its successors shall, on a yearly basis until Project buildout, identify emerging technologies which may yield emission reductions. Such consideration shall include analysis of the feasibility of new emission reduction measures recommended in updates of the SCAQMD's *CEQA Air Quality Handbook*.

The Applicant or its successors shall assess the feasibility of implementing such measures based on the following:

- The ability of the measure to reduce air pollutant emissions which result from Project construction operations.
- The new measure or product is equivalent in cost to the standard strategies, measures or products.
- The availability of the new measure or product prior to the time required for implementation.
- The reasonable reliability and reasonably equivalent durability of the new measure or product to standard measures and products.

- The absence of significant adverse impacts to other areas of the environment (e.g. noise, water, aesthetics).
- The consistency of the new measure with the Project's design concepts and objectives.

The Air Quality Monitor shall determine the feasibility of all new recommended measures, technologies or products identified by the Applicant.

Recommendations which are determined to be feasible and appropriate pursuant to the standards set forth above shall be incorporated by the Applicant into all future contracts for construction and development at the Proposed Project.

The Monitor shall also be responsible for providing the Director of Planning with documentation regarding compliance with this provision.

All associated reports and documentation (including feasibility assessment of new emission reduction measures, the Air Quality Monitor's feasibility determination and the Applicant's compliance with the feasible new emission reduction measures and technologies) shall be included in an annual monitoring report to the enforcement and monitoring agencies and kept open for public inspection. Said reports, documentations and monitor's identification, qualifications, address and telephone number shall be placed in the pertinent files of the City Planning Department.

Implementation of new mitigation measures or products would not affect contracts and commitments entered into prior to the date the new mitigation measures/products and strategies meet the above standards. However, contractors shall be informed/advised of the available new emission reduction measures and technologies.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Construction

**Monitoring Frequency:** On an annual basis until project buildout.

**Action Indicating Compliance with Mitigation Measure(s):** Annual contact with Southern California Air Quality Management District (SCAQMD); retention of an Air Quality Monitor; documentation that the Applicant has properly determined the feasibility of all new recommended technologies; contracts shall include these mitigation measures.

## Additional Mitigation Measures for the Off-site Improvements

**B-11** For each of the road widenings, the Air Quality Monitor shall monitor construction activity and insure implementation of the mitigation measures listed below. The Monitor shall check construction procedures. In addition, the Applicant shall identify and the Monitor shall assess the feasibility and recommend implementation of new technological advancements that will help minimize emissions.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Construction

**Monitoring Frequency:** Monthly

**Action Indicating Compliance with Mitigation Measure(s):** Monthly Report during construction activities.

**B-12** The following procedures to control air emissions shall be applied wherever applicable:

### Construction Equipment/Operation

- a. Control Technologies: Apply NO<sub>x</sub> control technologies, such as fuel injection timing retard for diesel engines and air-to-air after cooling, as feasible.
- b. Low Emission Equipment and Technologies: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology (e.g., diesel particulate filters, oxidation catalysts, etc.) or at a minimum, low sulfur fuel, as feasible, as required by SCAQMD Rule 431.2.
- c. Prohibit truck idling in excess of two minutes, whenever practical.
- d. Where possible use electricity from power lines rather than temporary generators.
- e. Construction Practices: Use only well-maintained equipment, utilize proper planning to reduce rework and multiple handling of earth materials, select equipment that is properly sized to minimize trips/use, consolidate deliveries, and maximize off-site construction (i.e. prefabricating and prepainting).

### Fugitive Dust

- f. Replace ground cover in disturbed areas as quickly as possible.



- g. Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- h. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered to the maximum extent feasible or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Section 23114.
- i. Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads. Water sweepers shall use reclaimed water, where available.
- j. Apply water up to three times daily or as necessary, to all unpaved parking or staging areas or unpaved road surfaces, during dry weather.
- k. Other Dust Controls: Any intensive dust generating activity, such as abrasive blasting, drilling, and grinding must be controlled to the maximum extent feasible. Such control would necessarily be specific to the activity, but could include the use of screens or enclosures, water sprays or collection devices.

**Building Materials and Architectural Coatings**

- l. Building materials, architectural coatings and cleaning solvents used must comply with all applicable South Coast Air Quality Management District (SCAQMD) rules and regulations. Paints with VOC levels less than those set forth in SCAQMD Rule 1113 shall be used, as feasible.

**Enforcement Agency:** City of Los Angeles, Department of City Planning

**Monitoring Agency:** City of Los Angeles, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Monthly.

**Action Indicating Compliance with Mitigation Measure(s):** Monthly Report during construction activities.

## C. WATER RESOURCES

### Mitigation Measures for the Proposed Project and the Equivalency Program

#### C.(1) Hydrology

**C.(1)-1** Prior to issuance of any building permit, the Applicant shall be required to complete or otherwise guarantee completion of the Freshwater Marsh, Riparian Corridor and other structural/treatment control BMPs (e.g., Best Management Practice catchbasins, etc.), satisfactory to the City of Los Angeles Department of Public Works and/or other responsible agencies (e.g., U.S. Army Corps of Engineers in conformance with Permit No. 90-426-EV), as applicable.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once prior to issuance of any building permit

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any “B,” building, or grading permit.

**C.(1)-2** Prior to recordation of the first final map, a covenant and agreement shall be prepared and recorded satisfactory to the Department of Public Works, Bureau of Sanitation, Stormwater Management Division and the City Attorney, as appropriate, which shall include the following:

- Properties within the Proposed Project shall be encumbered with an obligation to perpetually fund the operation and maintenance of the appropriate structural/treatment control BMPs, such as the Freshwater Marsh and Riparian Corridor, and Best Management Practices catchbasins, satisfactory to the City of Los Angeles Department of Public Works. Properties dedicated to a public entity or owned by the property owners’ association (i.e., parks, community-serving parcels, etc.) shall not be subject to this funding obligation.
- The Proposed Project shall implement and perform the requirements set forth in the Operations, Maintenance and Monitoring Manual for the Freshwater Wetlands System, in accordance with all permit requirements to monitor and evaluate the hydrologic and water quality performance of the Freshwater Marsh and Riparian Corridor. Information obtained from the monitoring program shall be translated into corrective action and system modifications, if necessary, in accordance with the U.S. Army Corps of Engineers requirements and satisfactory to the City of Los Angeles Department of Public Works.

- A monitoring report shall be prepared as required by applicable permits which addresses water sampling locations, frequency of sampling, pollutants of concern to be tested, testing methods, corrective measures if necessary, etc., for the Freshwater Marsh and Riparian Corridor. The report shall be submitted satisfactory to the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and the City of Los Angeles Department of Public Works, Bureau of Sanitation.
- Maintenance records for the structural/treatment control Best Management Practices shall be maintained and submitted to the City of Los Angeles Department of Public Works, Bureau of Sanitation.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works; Los Angeles City Attorney

**Monitoring Phase:** Pre-Construction; Post-Construction

**Monitoring Frequency:** Once at recordation of first final map; once at issuance of any building permits; annually

**Action Indicating Compliance with Mitigation Measure(s):** Recordation of covenant and agreement; issuance of any building permits; submittal of annual report

**C.(1)-3** Prior to issuance of any building permit, the Applicant shall encumber the parcel for which the permit is sought with a covenant to fund the Playa Vista Community Service Organization or other funding mechanism, satisfactory to the Advisory Agency and the City Engineer, for the purpose of funding the operation and maintenance of the Freshwater Marsh and Riparian Corridor and other structural/treatment control BMPs. The covenant shall obligate future owners within the parcel to fund the Community Service Organization or other funding mechanism, and shall contain provisions detailing the timing and mechanism for such funding, satisfactory to the Department of Public Works. Properties dedicated to a public entity or owned by the property owners' association (i.e., parks community-serving parcels, etc.) shall not be subject to this funding obligation.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at recordation of first final map; once at issuance of any building permit

**Action Indicating Compliance with Mitigation Measure(s):** Approval of a covenant and agreement; issuance of any building permit

**C.(1)-4** Prior to issuance of any building permit, the Applicant or the Playa Vista Community Service Organization shall establish and enter into an agreement with the Ballona Wetlands Conservancy or other responsible entity, which shall address the responsibility for funding, coordination, and oversight of all operations and maintenance procedures for the Freshwater Marsh and Riparian Corridor. Maintenance shall be conducted, and maintenance reports submitted periodically and after each storm event to prevent trash, debris, and sediments from clogging the system, in accordance with the U.S. Army Corps of Engineers requirements and satisfactory to the City of Los Angeles Department of Public Works.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Prior to issuance of any building permit, periodic submittal of maintenance reports

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any building permit; approval of monitoring and maintenance program(s)

## **C.(2) Water Quality**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

**C.(2)-1** The Proposed Project shall incorporate the following features to reduce pollutant loadings, to the extent permissible by applicable codes:

- Roof drain biofiltration systems to receive and filter runoff from all buildings within the Proposed Project;
- Water quality catch basin inserts for all catch basins within the Proposed Project site where water is flowing to the Central Storm Drain;
- A vegetated swale within a park adjacent to the Riparian Corridor to receive and filter low-flow runoff from the Proposed Project prior to entering the Riparian Corridor.

**Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property); County of Los Angeles, Department of Public Works.

**Monitoring Phase:** Pre-Construction

- Monitoring Frequency:** Once at issuance of “B” or grading permit.
- Action Indicating Compliance with Mitigation Measure(s):** Issuance of “B” or grading permit; approval of a Standard Urban Stormwater Mitigation Plan.
- C.(2)-2** Prior to issuance of a B-Permit or building permit for construction of the additional BMPs discussed above, as applicable, drawings and specifications of the proposed BMP shall be submitted to the City of Los Angeles for review and comments. Such information shall include, but is not limited to, a site map showing locations of the proposed BMPs, product manufacturer, model number, and manufacturer’s recommended maintenance schedule.
- Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)
- Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property); County of Los Angeles, Department of Public Works
- Monitoring Phase:** Construction
- Monitoring Frequency:** Once at execution of construction contracts.
- Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contract with mitigation measure provisions.
- C.(2)-3** The Proposed Project shall include on-site operation and maintenance programs designed to minimize environmental impacts including:
- Only slow-release fertilizers that are applied directly to the soil shall be used to establish vegetation. No fertilizer shall be applied during or within 72 hours of a forecasted rain event. Erosion and sediment control measures shall be implemented during landscaping of the project to minimize the export of nutrients from the Proposed Project site.
  - The Proposed Project shall include the use of native or drought-resistant vegetation in no less than 50% of the community landscaped areas, and an irrigation program that emphasizes no excess irrigation. Any non-native vegetation selected for landscaping shall be noninvasive.
  - The Proposed Project shall install trash racks at inlets to the Riparian Corridor.
  - All multi-family buildings within the Proposed Project shall include trash collection and storage areas for residents, and managed trash collection areas for commercial businesses.

- The Master Homeowner’s Association shall provide tenants/residents with information to encourage compliance with good housekeeping practices, such as proper disposal of household and office hazardous waste; encourage tenants/residents not to plant exotic grasses or other plants whose seeds may potentially migrate off their properties via wind, rain, or animals; and to inform residents of the potential receiving waters impacts of excessive dry-weather runoff.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Construction; Post-Construction

**Monitoring Frequency:** Once at execution of construction contracts; once at issuance of first certificate of occupancy.

**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contracts with mitigation measure provisions; copy of tenant/resident information package with mitigation measure provisions.

- C.(2)-4** Prior to issuance of any grading, building or B-Permit, the existing Playa Vista Stormwater Pollution Prevention Plan (SWPPP) shall be amended to include the Proposed Project. The Stormwater Pollution Prevention Plan (SWPPP) shall identify temporary Best Management Practices (BMPs) to be implemented in accordance with the General Construction Permit issued by the Regional Water Quality Control Board (RWQCB). Best Management Practice (BMP) categories deployed during construction shall include contractor activities practices, waste management practices, soil stabilization (erosion control) practices, sediment control practices, roadway cleaning/tracking control practices, vehicles and equipment cleaning, concrete truck washout and fueling practices.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works; Regional Water Quality Control Board

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at execution of construction contracts.

**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contracts with mitigation measure provisions; approval of a Stormwater Pollution Prevention Plan.

## Mitigation Measures for the Off-Site Improvements

**C.(2)-5** Construction contractor(s) selected for the proposed improvements shall be required, through contract specifications, to use grading and excavation techniques that control runoff from the off-site traffic improvements, as well as Best Management Practices (BMPs) to avoid/control erosion and sedimentation. The contractor(s) shall also be required to implement other Best Management Practices (BMPs) appropriate for the nature, location, timing (relative to rainy season) and duration of proposed construction activities. Typical Best Management Practices (BMPs) related to construction activities include the following:

- Erosion and sediment controls including soil stabilization, silt fence installation and/or sandbag installation;
- Wind erosion controls such as using only the minimum amount of water to control dust without adding to runoff;
- Tracking controls such as construction vehicle egress management for sedimentation carried on vehicles leaving the site;
- Spill prevention and control measures such as regular inspections of vehicles for leaks, and prevention measures such as oil pans under parked vehicles; and
- Concrete and construction materials management such as the avoidance of fresh concrete washing unless runoff can be drained to a bermed or level area away from drain outlets or channels.

Permanent Best Management Practices (BMPs) shall be integrated into the design and operation of off-site improvements, as appropriate. Examples of such Best Management Practices (BMPs) include street sweeping, catch basins, directing surface runoff into landscaped medians/strip, and other water quality treatment measures as feasible and appropriate.

**Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at execution of construction contract for tract grading

**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contract with mitigation measure provisions.

## D. BIOTIC RESOURCES

### Mitigation Measures for the Proposed Project and the Equivalency Program

#### Construction Measures

- D-1** Prior to any earthmoving activities during the breeding and nesting season, the Applicant shall have a field survey conducted by a qualified biologist to determine if active nests of breeding birds are present within the area of potential influence of the activity. This area of influence shall include the nest site as well as an appropriate buffer determined by the biologist based on field observations and the biology of the species. This survey shall be conducted within three (3) days before the clearing/grubbing. If nesting birds protected under the Migratory Bird Treaty Act or California Fish and Game Code are found, the breeding/nesting area(s) shall be protected according to the biologist's recommendations that include, but are not limited to, a suitable buffer area around the nest, which shall not be disturbed until the young have fledged.

**Enforcement Agency:** Los Angeles City, Department of Planning

**Monitoring Agency:** Los Angeles City, Department of Planning

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once prior to issuance of grading permits; monthly

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading permits; submittal of monthly reports

#### Increased Non-Native Plant Species

- D-2** Prior to issuance of any building permit, landscape guidelines shall be prepared by a licensed landscape architect in consultation with a qualified biologist for review and approval by the City Planning or Public Works department, if applicable. The plan shall identify non-native plants that are potentially invasive and that shall be prohibited.

These planting guidelines shall be provided to all new business owners and residents in the Project site prior to the close of escrow and executed lease agreements. Planting guidelines shall be monitored by a licensed landscape architect.

Disposal of cuttings of any ornamental plants during Project operation in on-site or off-site open space areas shall be strictly prohibited.



**Enforcement Agency:** Los Angeles City, Department of Public Works or Planning Department

**Monitoring Agency:** Los Angeles City, Department of Public Works or Planning Department

**Monitoring Phase:** Pre-Construction, Post-Construction

**Monitoring Frequency:** Once at plot plan review.

**Action Indicating Compliance with Mitigation Measure(s):** Approval of landscape design plan; evidence of provision of planting guidelines to new business owners/residents.

**D-3** Plants that might be invasive or that might interbreed with native plants in nearby restoration areas shall be avoided in the parkway landscaping along Bluff Creek Drive.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at plot plan review.

**Action Indicating Compliance with Mitigation Measure(s):** Approval of “B” permit for Bluff Creek Drive.

### **Bluff Restoration**

**D-4** Concurrent with the construction of the adjacent Riparian Corridor, the bluff area within the Habitat Creation/Restoration Component shall be restored as coastal sage scrub habitat, in accordance with the Bluff Restoration Plan and specific success criteria, maintenance provisions, and monitoring requirements contained in Attachment B of the MMRP.

**Enforcement Agency:** Los Angeles City, Department of Public Works.

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of “B” permit for the restored habitat area; monthly during restoration of the bluff restoration area.

**Action Indicating Compliance with Mitigation Measure(s):** Approval of “B” permit for the restoration area; monthly during restoration of the bluff restoration area.

## Light and Glare/Noise

**D-5** Night lighting within 100 feet of restored habitat areas (riparian areas and bluffs) shall be directed onto the property and away from the habitat area. Such lighting shall be downcast luminaries with light patterns directed away from natural areas, and shall be coordinated with the lighting engineer and the environmental and biological resource monitor.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City Department of Public Works, as applicable

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City Department of Public Works, as applicable

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at plot plan review; once at issuance of Certificate of Occupancy, if applicable

**Action Indicating Compliance with Mitigation Measure(s):** Approval of plot plan; issuance of a temporary or final Certificate of Occupancy, if applicable

**D-6** Landscaping along the south side of Bluff Creek Drive adjacent to the habitat area shall incorporate non-invasive plant materials that will reduce the potential for intrusion of vehicle headlight glare and buffer traffic noise into the Riparian Corridor.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at issuance of "B" permit for Bluff Creek Drive.

**Action Indicating Compliance with Mitigation Measure(s):** Approval of "B" permit for Bluff Creek Drive.

## Intrusions into Habitat Areas by Humans and Pets

**D-7** The riparian corridor shall be fenced along the northern side and at strategic locations to discourage access into the habitat area.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at construction of the riparian corridor

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of “B” permit for riparian corridor

**D-8** Signs shall be placed along recreational trails in proximity to the Habitat Creation/Restoration Component to inform users of the proximity of the trail to sensitive habitat areas. Signs shall list rules and regulations for trail use designed to protect sensitive biological resources. Rules shall include, but not be limited to, the following: no access to off-trail areas; no excessively loud voices or other noise disturbances; no harassment of wildlife; no domestic pets; no “taking” of plants and animals; and strict adherence to trail boundaries.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Construction; Post-Construction

**Monitoring Frequency:** Once at issuance of “B” permits for riparian corridor and bluff restoration; annually

**Action Indicating Compliance with Mitigation Measure(s):** Approval of plot plan; issuance of “B” permit for riparian corridor with provisions of this measure; submittal of annual monitoring reports

## **E. NOISE**

### **Construction Noise**

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

**E-1** Prior to the issuance of any grading, excavation, foundation, or building permits, the Applicant shall provide proof satisfactory to the Advisory Agency that all construction documents require contractors to comply with Los Angeles Municipal Code Section 41.40 which requires all construction and demolition activity located within 500 feet of a residence to occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday, and that a noise management plan for compliance and verification has been prepared by a monitor retained by the Applicant. At a minimum, the plan shall include the following requirements:

- Pile drivers used in proximity to sensitive receptors shall be equipped with noise control having a minimum quieting factor of 10 dB(A);
- Loading and staging areas must be located on site and away from the most noise-sensitive uses surrounding the site as determined by the Advisory Agency;

- Program to maintain all sound-reducing devices and restrictions throughout the construction phases;
- An approved haul route authorization that avoids noise-sensitive land uses to the maximum extent feasible; and
- Identification of the noise statutes compliance/verification monitor, including his/her qualifications and telephone number(s).

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at execution of grading or construction contract; once at issuance of grading or building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of noise plan; execution of grading or constructions contract with mitigation measure provisions; issuance of grading or building permits.

**E-2**

Prior to the issuance of the first grading permit, the Applicant shall submit to the City of Los Angeles Planning Department a construction noise management plan relative to Playa del Rey School. The plan shall set forth the process for the notification to the Playa del Rey School of any construction activities which may affect the school, and noise management measures to be undertaken when construction noise levels are projected to be or are greater than 5 dBA over ambient exterior conditions, or by more than 3 dBA in the event the ambient noise level at Playa del Rey School exceeds 67 dBA. Noise management measures may include one or more of the following: temporary sound barriers (e.g., plywood fences, sound blankets, earthen berms), pile driver acoustical shields, residential grade mufflers, construction activity limitation during noise-sensitive time periods, and reduced heavy equipment operation within close proximity of the Playa del Rey School

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at execution of grading or construction contract; once at issuance of grading or building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of noise plan; execution of grading or constructions contract with mitigation measure provisions; issuance of grading or building permits.

### **Additional Construction Mitigation for the Off-Site Improvements**

- All construction and demolition activity located within 500 feet of a residence shall occur between 7:00 A.M. and 6:00 P.M. Monday through Friday and 8:00 A.M. and 6:00 P.M. on Saturday.
- Contractors shall ensure that construction equipment is fitted with modern sound-reduction equipment.
- When construction operations occur adjacent to occupied residential areas, the contractor shall implement all technically feasible mitigation measures, pursuant to the Los Angeles Municipal Code, that include, but are not limited to, changing the location of stationary construction equipment, shutting off idling equipment, notifying adjacent residences in advance of construction work, and installing temporary acoustic barriers around stationary construction noise sources.
- Haul routes that avoid noise-sensitive land uses shall be utilized to the maximum extent feasible.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at execution of grading or construction contract; once at issuance of grading or building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of noise plan; execution of grading or constructions contract with mitigation measure provisions; issuance of grading or building permits.

### **Operational Noise**

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

- E-3** Construct all exterior walls, floor-ceiling assemblies (unless within a unit) and windows having a line of sight (30 degrees measured from the horizontal plane) of Jefferson Boulevard and Bluff Creek with double-paned glass or an equivalent and in a manner to provide an airborne sound insulation system achieving a Sound Transmission Class of 50 (45 if field tested) as defined in the American Standard Test Methods E90 and E413. The subdivider, as an alternative, may retain an engineer registered in the State of California with expertise in acoustical engineering, who shall submit a signed report for an alternative means of sound insulation satisfactory to the Advisory Agency which achieves a maximum interior noise of CNEL 45 (Residential).

**Enforcement Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at issuance of building permit; Building and Safety Inspection during/after Construction

**Action Indicating Compliance with Mitigation Measure(s):** Acoustical analysis; issuance of building permit.

**E-4** All HVAC and related roof-top mechanical equipment shall be installed in accordance with the City of Los Angeles Noise Ordinance, as applicable. Prior to issuance of temporary or permanent certificates of occupancy for each building, an acoustical inspection shall be performed for each building to ensure building compliance with applicable interior and exterior noise criteria as specified by the City of Los Angeles Noise Ordinance.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once during building permit plan check review; once at issuance of Certificate of Occupancy.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permits; issuance of Certificate of Occupancy.

## **F. LIGHT AND GLARE**

### **F.(1) Natural Light and Shading**

None proposed.

## F.(2) Artificial Light and Glare

### Mitigation Measures for the Proposed Project and the Equivalency Program

#### Artificial Lighting

- F.(2)-1** All outdoor lighting for individual buildings, other than signs, shall be limited to those required for safety, security, low level exterior architectural illumination, and landscaping, except for temporary special events..

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City, Department of City Planning.

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City, Department of City Planning.

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at plot plan review; once at issuance of a temporary or permanent Certificate of Occupancy

**Action Indicating Compliance with Mitigation Measure(s):** Approval of plot plan; issuance of temporary or permanent Certificate of Occupancy

- F.(2)-2** Animated building identification signs shall be prohibited. Illuminated residential building signs shall not be permitted above the first level.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City, Department of City Planning.

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City, Department of City Planning.

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at plot plan review; once at issuance of temporary or permanent Certificate of Occupancy

**Action Indicating Compliance with Mitigation Measure(s):** Approval of plot plan; issuance of temporary or permanent Certificate of Occupancy

#### Glare

- F.(2)-3** The Applicant shall use exterior building materials and façades which eliminate or minimize highly reflective materials. At the time of plot plan review for specific development projects, building materials shall be reviewed to assure that they do not exceed the reflectivity of standard building materials. If the Applicant should desire to

use more reflective materials in locations isolated from major thoroughfares, adequate analysis must be presented to the Department of City Planning to determine that the building, due to location, would not cause glare impacts on motorists or nearby population.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of plot plan approval and building permit; once at issuance of Certificate of Occupancy

**Action Indicating Compliance with Mitigation Measure(s):** Approval of plot plan; issuance of temporary or permanent Certificate of Occupancy

## G. LAND USE

### Mitigation Measures for the Proposed Project and the Equivalency Program

**G-1** Prior to recordation of the tract map, the Proposed Project development standards and guidelines shall be incorporated as tract map conditions including, but not limited to, building height, setbacks, lot coverage, density, and land uses, as analyzed in ENV-2002-6129-EIR. (See Attachment C) Any changes shall be subject to additional environmental review and implementation of proper mitigation measures if additional impacts associated with such changes are identified.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at tract map approval.

**Action Indicating Compliance with Mitigation Measure(s):** Tract map approval.

**G-2** Lot 113 of VTTM 49104 shall remain as open space unless the Advisory Agency determines that this lot is not needed to meet the open space requirements of VTTM 49104.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning



**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at tract map approval.

**Action Indicating Compliance with Mitigation Measure(s):** Advisory Agency Determination.

### **Additional Mitigation Measure for the Off-site Improvements**

**G-3** Any private property that is affected during the construction of off-site improvements shall be restored to be consistent with conditions prior to construction, to the extent feasible.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Post-Construction

**Monitoring Frequency:** Once at completion of site work.

**Action Indicating Compliance with Mitigation Measure(s):** Report at the completion of site work with inclusion in the Annual Monitoring Report.

## **H. MINERAL RESOURCES**

None proposed.

## **I. SAFETY/RISK OF UPSET**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

#### **Hazardous Materials Management**

**I-1** Prior to issuance of demolition permits for Buildings 22, 45, and other sheds and small storage buildings, evidence shall be provided to the City of Los Angeles Department of Building and Safety that the demolition contract provides for a qualified asbestos and lead based paint removal contractor/specialist to remove or otherwise abate asbestos and lead based paint prior to or during demolition activities in accordance with federal, state, and local regulations.

**Enforcement Agency:** South Coast Air Quality Management District, Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department Building and Safety

- Monitoring Phase:** Pre-Construction, Construction
- Monitoring Frequency:** Once at issuance of demolition permits for Buildings 22, 45, and other sheds
- Action Indicating Compliance with Mitigation Measure(s):** Issuance of demolition permits for Buildings 22, 45, and other sheds; demolition contract with mitigation provisions; applicable permit from SCAQMD
- I-2** Prior to issuance of demolition permits for Buildings 22, 45, and other sheds and small storage buildings, evidence shall be provided to the City of Los Angeles Department of Building and Safety that the demolition contract provides for continuous compliance with all applicable government regulations and conditions related to hazardous materials and wastes management.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Pre-Construction, Construction
- Monitoring Frequency:** Once at issuance of demolition permits for Buildings 22, 45, and other sheds
- Action Indicating Compliance with Mitigation Measure(s):** Issuance of demolition permits for Buildings 22, 45, and other sheds

### Soil/Groundwater Contamination

- I-3** Any contaminated soil, groundwater and/or toxic materials removed during remediation activities or discovered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ (in-place), or otherwise managed in accordance with the Regional Water Quality Control Board (RWQCB) requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented so as to render the area suitable for grading activities to resume.
- Enforcement Agency:** Regional Water Quality Control Board, Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)
- Monitoring Agency:** Regional Water Quality Control Board, Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)
- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Once at issuance of grading permit; monthly

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading permit, Monthly Statements of Compliance, Annual Monitoring Report

- I-4** To address the potential that VOC-contaminated soils, groundwater, and/or other materials may be encountered during excavation and grading, the applicant contractor(s) selected for excavation and grading work shall maintain a valid South Coast Air Quality Management District (SCAQMD) Rule 1166 permit plan (i.e., approval of a Contaminated Soil Mitigation Plan) for areas of known or suspected contamination, and be prepared to control nuisance odors per SCAQMD Rules and Regulations.

**Enforcement Agency:** South Coast Air Quality Management District, Department of Building and Safety

**Monitoring Agency:** South Coast Air Quality Management District, Department of Building and Safety

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Monthly during construction

**Action Indicating Compliance with Mitigation Measure(s):** Maintenance of a valid South Coast Air Quality Management District Rule 1166 permit; Monthly Statements of Compliance

- I-5** Any contaminated soils stockpiled at the site shall be stored in such a manner that underlying soils are not cross-contaminated. This could be accomplished by the use of heavy-duty plastic sheeting placed under and on top of the stockpiled materials, or other suitable methods. The management, treatment, or disposal of such material shall comply with all federal, state, and local regulations related to hazardous waste.

**Enforcement Agency:** Los Angeles City, Department of Public Works (Public Right of Way), Department of Building and Safety (Private Property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (Public Right of Way), Department of Building and Safety (Private Property)

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at execution of construction contracts; monthly during construction

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading permit, execution of construction contracts with mitigation measure provisions; Monthly Statements of Compliance

- I-6** All stockpiled contaminated materials shall be protected in order to prevent material from being washed into storm drains. This could be accomplished by the use of sand bags around the material, heavy-duty plastic sheeting placed on top of smaller stockpiles of materials, or other suitable methods.

**Enforcement Agency:** Los Angeles City, Department of Public Works (Public Right of Way), Department of Building and Safety (Private Property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (Public Right of Way), Department of Building and Safety (Private Property)

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at execution of grading contract; monthly

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading permit, execution of grading contract with mitigation measure provisions; Monthly Statements of Compliance

**I-7** Grading and demolition contractors shall be required by construction specifications to secure approval of haul routes to export or otherwise transport off-site excavated materials prior to commencement of such activity, pursuant to LAMC Section 91.7006.

**Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at execution of grading or demolition contract; once at haul route approval; monthly

**Action Indicating Compliance with Mitigation Measure(s):** Execution of grading or demolition contracts with mitigation measure provisions; haul route approval; monthly Statements of Compliance

**I-8** Prior to issuance of a grading permit or B-Permit for activities involving construction dewatering, evidence shall be provided to the Los Angeles Department of Building and Safety (LADBS) or the Los Angeles Department of Public Works (LADPW), as appropriate, that a valid National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge permit is in place. The National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge permit shall include provisions for evaluating the groundwater for potential contamination and, if necessary, the need for treatment of dewatering discharge.

**Enforcement Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property)

- Monitoring Agency:** Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property); Regional Water Quality Control Board
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at issuance of grading or “B” permit
- Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading or “B” permit; evidence of valid NPDES or Industrial Waste Discharge permit(s)
- I-9** Groundwater extracted in accordance with remedial activities and construction dewatering that may be required during project development shall be conducted in accordance with RWQCB and other agency requirements (i.e., Los Angeles Department of Public Works (LADPW), Los Angeles Department of Building and Safety (LADBS), etc.), as appropriate. In the event that contaminated groundwater is encountered during excavation, grading or construction, the activities that potentially lead to the discharge of such groundwater shall be halted until the dewatering discharge options are evaluated and managed pursuant to RWQCB or other agency requirements, as appropriate. The Regional Water Quality Control Board (RWQCB) or other agency reporting requirements shall be implemented, as appropriate.
- Enforcement Agency:** Regional Water Quality Control Board, Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property).
- Monitoring Agency:** Regional Water Quality Control Board, Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property); Regional Water Quality Control Board
- Monitoring Phase:** Construction
- Monitoring Frequency:** Once at execution of grading or construction contract.
- Action Indicating Compliance with Mitigation Measure(s):** Execution of grading or construction contract
- I-10** Extraction of contaminated soil vapors shall be conducted in accordance with RWQCB and SCAQMD established handling, treatment and disposal requirements in conjunction with the implementation of remedial activities requiring such extraction.
- Enforcement Agency:** Regional Water Quality Control Board, South Coast Air Quality Management District, Los Angeles City, Department of Public Works (public right-of-way); Los Angeles City, Department of Building and Safety (private property).
- Monitoring Agency:** Regional Water Quality Control Board, South Coast Air Quality Management District, Los Angeles City, Department of Public Works (public

right-of-way); Los Angeles City, Department of Building and Safety (private property); Regional Water Quality Control Board

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at execution of grading or construction contract.

**Action Indicating Compliance with Mitigation Measure(s):** Execution of grading or construction contract with the provisions of this measure

- I-11** The Applicant shall implement a soil import procedure to evaluate imported soils, satisfactory to the Regional Water Quality Control Board. The procedure shall include investigation of historical uses at the borrow site, soil sampling and analysis of soil prior to excavation and hauling to the site, and comparison of detected concentrations of any chemicals found in soil with appropriate health-based screening levels. Only soils that pass the screening shall be imported to the site and used as fill.

**Enforcement Agency:** Los Angeles City, Department of Public Works, Regional Water Quality Control Board

**Monitoring Agency:** Los Angeles City, Department of Public Works, Regional Water Quality Control Board

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at issuance of grading permit; monthly

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of grading permit, Monthly Statements of Compliance

### **Methane Safety System for Long-Term Project Operations**

- I-12** Prior to issuance of a building permit for individual development projects within the Proposed Project site, the permit applicant shall submit to the LADBS a methane safety plan prepared by a licensed engineer. The methane safety plan shall conform to the Village at Playa Vista Building Methane Mitigation Guidelines and Methane Mitigation Standard, or the City's Methane Ordinance No. 175,790 provided that the requirements in that new ordinance continue to reduce the potentially significant impact to a less than significant level. The methane safety plan or site investigation/construction plan shall report the following: methane concentration levels that exist at the area of the proposed construction/improvement and shall specify the appropriate methane safety measures that are incorporated into the design, construction, and operation of the subject improvement. Based on the levels of methane identified at specific sites, a gas detection system, pressure sensors, ventilation, monitoring, and emergency procedures, and other measures as provided for in the Village at Playa Vista Building Methane Mitigation Guidelines or the City's Methane Ordinance No. 175,790 shall be required, as appropriate. Mitigation systems for each building shall be based on a site investigation in combination with the Village at Playa Vista Building Methane Mitigation Guidelines

or the City Methane Ordinance. Any variations to the Village at Playa Vista Building Methane Guidelines and Table XX or the City Methane Ordinance are subject to the joint approval of the LADBS and the Los Angeles Fire Department (LAFD) when engineering and other data and analysis demonstrates an equivalent level of building safety. The specific design elements of the methane requirements shall be subject to the review and approval of the LADBS in consultation with the LAFD.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once prior to issuance of Building Permit

**Action Indicating Compliance with Mitigation Measure(s):** Methane safety plan approval or site investigation/construction plan approval

- I-13** Prior to issuance of a B-Permit for public works projects or subsurface utility improvements with the Proposed Project site, the permit applicant shall submit to the City of Los Angeles Department of Public Works (LADPW), a methane safety plan or site investigation/construction plan prepared by a licensed engineer who is acceptable to LADPW. The methane safety plan or site investigation/construction plan shall indicate the methane concentration levels that exist at the area of the proposed construction/improvement and shall specify the appropriate methane safety measures that are incorporated into the design, construction, and operation of the subject facility. The specific contents of the methane safety plan or site investigation/construction plan and the nature and extent of safety provisions described therein shall be subject to the discretion, review, and approval of the LADPW in consultation with the Los Angeles Fire Department.

**Enforcement Agency:** City of Los Angeles, Department of Public Works

**Monitoring Agency:** City of Los Angeles, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Prior to issuance of a “B” Permit

**Action Indicating Compliance with Mitigation Measure(s):** Methane safety plan approval

## Other

- I-14** Should any unrecorded oil well be found during excavation and grading, it shall be abandoned in accordance with the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) under Title 124, Chapter 4 of the California Administration Code or recorded per DOGGR regulations. Prior to issuance

of any building permit within a lot affected by discovery of an unrecorded oil well, the Applicant shall submit a final clearance letter issued by DOGGR regarding the proper abandonment of the well(s) to the Department of Building and Safety and the Fire Department.

**Enforcement Agency:** Los Angeles Fire Department, California Department of Conservation, Division of Oil, Gas, and Geothermal Resources

**Monitoring Agency:** Los Angeles Fire Department, California Department of Conservation, Division of Oil, Gas, and Geothermal Resources

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Throughout project excavation and grading

**Action Indicating Compliance with Mitigation Measure(s):** Final clearance letter from DOGGR

- I-15** Prior to issuance of any building permit on a lot where oil or gas wells are found, an engineering plan that includes proper safety measures and timing of the implementation of those measures shall be submitted to and approved by LADBS.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Prior to the issuance of a building permit

**Action Indicating Compliance with Mitigation Measure(s):** Engineering plan approval

#### **Additional Mitigation Measures for the Off-Site Improvements**

- I-16** Construction contracts shall include provisions requiring continuous compliance with all applicable federal, state, and local government regulations and conditions related to hazardous materials and wastes management.

**Enforcement Agency:** Regional Water Quality Control Board, City of Los Angeles, Department of Public Works

**Monitoring Agency:** City of Los Angeles, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once prior to Construction Contracts

**Action Indicating Compliance with Mitigation Measure(s):** Compliant Construction Contracts



- I-17** Any known or discovered soils with contamination above applicable regulatory limits shall be excavated/disposed of, treated in-situ, or otherwise managed in accordance with the requirements of the affected regulatory agencies.
- Enforcement Agency:** City of Los Angeles, Department of Public Works, Regional Water Quality Control Board
- Monitoring Agency:** City of Los Angeles, Department of Public Works, Regional Water Quality Control Board
- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Throughout construction
- Action Indicating Compliance with Mitigation Measure(s):** No Further Action or Closure Letter, as applicable; Compliant construction contracts
- I-18** To address the potential that VOC-contaminated soils, groundwater, and/or other materials may be encountered during excavation and grading, the contractor(s) selected for excavation and grading work shall maintain a valid SCAQMD Rule 1166 permit plan (i.e., approval of a Contaminated Soil Mitigation Plan) for areas of known or suspected contamination, and be prepared to control nuisance odors per SCAQMD Rules and Regulations.
- Enforcement Agency:** South Coast Air Quality Management District, Department of Building and Safety
- Monitoring Agency:** South Coast Air Quality Management District, Department of Building and Safety
- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Monthly during construction
- Action Indicating Compliance with Mitigation Measure(s):** Maintenance of a valid South Coast Air Quality Management District Rule 1166 permit; Monthly Statements of Compliance
- I-19** In the event that contaminated groundwater is encountered during excavation, grading or construction, the dewatering discharge shall be evaluated and managed pursuant to RWQCB requirements.
- Enforcement Agency:** Regional Water Quality Control Board, City of Los Angeles Department of Public Works
- Monitoring Agency:** Regional Water Quality Control Board, City of Los Angeles Department of Public Works
- Monitoring Phase:** Construction
- Monitoring Frequency:** Throughout construction

**Action Indicating Compliance with Mitigation Measure(s):** RWQCB Approval

- I-20** Cal/OSHA worker safety requirements provide for air monitoring during subsurface excavation activities including borings, trenching and grading, to check for unsafe levels of methane, hydrogen sulfide, oxygen and carbon monoxide. Should unsafe levels occur, appropriate safety measures shall be implemented, as required.

**Enforcement Agency:** City of Los Angeles, Department of Public Works

**Monitoring Agency:** City of Los Angeles, Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Prior to issuance of Building Permit

**Action Indicating Compliance with Mitigation Measure(s):** Approval of contractor health and safety plan

**J. POPULATION, HOUSING AND EMPLOYMENT**

None proposed.

**K. TRANSPORTATION**

**K.(1) Traffic and Circulation**

**Mitigation Measures for the Proposed Project and the Equivalency Program**

**Transportation Improvement Program/Phasing**

- K.(1)-1** The Transportation Improvement Program shall be implemented according to the traffic mitigation measure subphasing plan presented in Attachment E, as may be modified and approved by the Los Angeles Department of Transportation in accordance with this measure. The subphasing plan may be revised, where appropriate and as determined by the Los Angeles Department of Transportation: (1) upon demonstration that measures for each subphase in the revised subphasing plan are equivalent or superior to the original mitigation measures, and/or (2) upon demonstration that a approval or implementation of measures has been delayed by other governmental entities, provided that the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of the Los Angeles Department of Transportation (LADOT).

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles City Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles City Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Approval of subphasing plan and subphasing plan revisions

**K.(1)-2** Prior to the issuance of any building permit for each subphase, all on- and off-site traffic mitigation measures required for that subphase shall be completed or suitably guaranteed satisfactory to the Los Angeles Department of Transportation (LADOT).

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles City Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction (for each subphase)

**Monitoring Frequency:** Once at issuance of building permit for each subphase.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any building permit for each subphase; compliance statement issued from LADOT.

**K.(1)-3** Prior to the issuance of the final Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT.

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles City Department of Public Works, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles City, Department of Public Works, Department of Building and Safety

**Monitoring Phase:** Pre-Construction (for final subphase)

**Monitoring Frequency:** Once at issuance of building permit for each subphase.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of final certificate of occupancy for final subphase; compliance statement issued from LADOT.

---

## Public Transit System Improvements

**K.(1)4** The Proposed Project shall provide four additional buses (to be operated by the City of Culver City) to supplement regional bus transit service along key travel corridors. The Proposed Project shall provide one bus each to supplement peak-hour operations for Lines 2 and 6, and two buses to supplement peak-hour operations and to extend Line 4 to provide all-day bus service from Fox Hills Transit Center along Jefferson Boulevard to the west. The Proposed Project shall also fully fund operations and maintenance costs for each new bus for a period of three years and compensate for the unsubsidized portion of the operations and maintenance costs for an additional seven years to ensure continued operations. Farebox revenues shall be credited against operating costs. The City shall be provided a copy of the agreement between the applicant and Culver City regarding implementation of the measure prior to tract recordation.

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E).

**Action Indicating Compliance with Mitigation Measure(s):** Funding or other financial guarantee, set forth in an agreement between the applicant and the City of Culver City, provided in accordance with the subphasing plan in Attachment E.

**K.(1)5** The Proposed Project shall provide design and implementation costs for implementation of the Transit Priority System (TPS) associated with the Metro Rapid Expansion Project at twenty-five (25) intersections along the Lincoln Boulevard Rapid Bus Route corridor. The Transit Priority System (TPS) hardware includes updated traffic signal controllers at signalized intersections and other associated bus vehicle identification system components that contribute to a system of real-time signalization control.

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or other financial guarantee, set forth in an agreement between the applicant and LADOT, provided in accordance with the subphasing plan in Attachment E

**K.(1)-6** The Proposed Project shall extend and expand the Internal Shuttle System, creating an intelligent demand-responsive Expanded Shuttle System which provides enhanced transit service for Project residents, visitors, employees, and the surrounding community, focusing on providing connections to key destinations such as Marina del Rey, Howard Hughes Center, the adjacent Playa Vista First Phase Project, and the Fox Hills Mall. Connections to regional transit service shall be provided at Lincoln Boulevard/Jefferson Boulevard and Fox Hills Mall Transit Center. This shuttle shall consist of the following key features:

- Core Service Area – The central portion of the service area includes the area within the Proposed Project and Playa Vista First Phase Project sites. This core service area shall be continuously served by a core route along Runway Road from Crescent Park on the west side of the development to the Campus on the east. Minimum 15 minute-headways shall be provided during the morning and evening peak hours along this core route. Key neighboring destinations, including Marina Del Rey, Fox Hills Mall, and Howard Hughes Center, shall be included as part of the demand-responsive component within the service area.
- Specially Equipped Buses – Buses shall be low emission or zero emission buses sized appropriate to their role within the project (approximately 20-25 passenger vehicles). The buses shall be equipped with global positioning system (GPS) or other vehicle tracking system devices and communications systems in order to be able to provide the “Next Bus” locational and status information and to respond to calls from the extended service areas on a real-time basis.
- “Next Bus” Real Time Information – Information on bus location and status shall be available over the internet and at bus shelters
- Bus Call Ability – Patrons at bus stops outside of the central system core shall have the ability to call for the shuttle bus at the bus stop; whereby the shuttle operator would proceed to the requested location. Information on the status of the bus and the anticipated wait time would then be given to the patron.

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of temporary or permanent Certificate of Occupancy; evidence of shuttle operation satisfactory to LADOT

**K.(1)-7** The Proposed Project shall provide two additional buses for the implementation of a Limited Stop Bus Service (to be operated by the Culver City Bus) during peak hours. Service frequency shall be approximately 30 minutes during the peak hours. This Limited Bus shall originate from the Fox Hills Mall Transit Center and shall serve the areas along the Sepulveda, Jefferson, and Centinela corridors, including the office, studio, and residential uses within the Proposed Project and adjacent First Phase Playa Vista project; the retail and office complex at Howard Hughes Center; downtown Westchester; and the Century Boulevard Office Corridor. The Limited Bus Service would offer connections and potentially coordinated transfers with other regional bus service and the Playa Vista intelligent shuttle. The Proposed Project shall also fully fund operations and maintenance costs for each new bus during peak hours for a period of three years and compensate for the unsubsidized portion of the operations and maintenance costs for an additional seven years to ensure continued operations. Farebox revenues shall be credited against operating costs. The City shall be provided a copy of the agreement between the applicant and Culver City regarding implementation of the measure prior to tract recordation.

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or other financial guarantee, set forth in an agreement between the applicant and the City of Culver City, provided in accordance with the subphasing plan in Attachment E

## Roadway and Intersection Improvements

### City of Los Angeles

**K.(1)-8** Widening, restriping, signal system improvements such as Adaptive Traffic Control Systems (ATCS) and/or public transit enhancements at the following intersections shall be required in a manner satisfactory to the Los Angeles Department of Transportation (LADOT).

- *Centinela Avenue Corridor.* This corridor is proposed to be improved between Culver Boulevard and the SR-90 Freeway. This improvement consists of provision of an additional northbound lane along Centinela Avenue within the corridor along with a central turn lane where feasible. This improvement would result in three lanes northbound and two lanes southbound; and effectively extend the three-lane per direction improvement provisions of the adjacent Playa Vista

First Phase Project between Jefferson Boulevard and SR-90 to the north to Culver Boulevard. All the intersections along this corridor would also be improved with the additional travel lane in the northbound direction. The implementation of this corridor improvement would occur in two phases. The first phase of this improvement involves widening the Centinela Avenue roadway to provide two lanes in each direction plus a central two-way left turn lane and parking on both sides of the street. In the second phase, on-street parking would be restricted on the east side of the roadway during peak commute hours to facilitate provision of a third northbound lane between SR 90 and Culver Boulevard. This second phase improvement would not be considered until traffic demands reveal the need for added roadway capacity.

- *La Tijera Boulevard/Centinela Avenue.* Add a westbound through lane to along Centinela Avenue so that the westbound approach provide two through lanes, a shared through-right turn lane and dual left turn lanes.
- *Culver Boulevard/Nicholson Street.* Implement the Regional Bus enhancements providing additional service along Culver City Bus Line 4 extending its service to Playa del Rey along Jefferson Boulevard and Culver Boulevard.
- *Sepulveda Boulevard/Howard Hughes Parkway.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6 and the design and implementation of the expanded internal shuttle system serving the Howard Hughes Center. Additionally, contribute to the design and implementation of a Limited Bus Service along Sepulveda Boulevard between the Proposed Project and Howard Hughes Center and the Century Boulevard Office Corridor.
- *Sepulveda Boulevard/Imperial Highway.* Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS) or a similar signal system enhancement program.
- *I-405 NB Ramps/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Lines 2 and 4 and its extension, and the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall. Additionally, restripe the intersection's westbound approach to provide a separate right, through-right and two through lanes.
- *I-405 SB Ramps/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along Culver City Bus Lines 2 and 4 and its

extension, and the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall.

- *Lincoln Boulevard/83rd Street.* Contribute to the provision of additional signal equipment, if required, to obtain the following overlapping right-turn arrow signal indications: Westbound 83rd Street right turns overlapping with the Lincoln Boulevard north-south left turn phase. Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS).
- *Lincoln Boulevard/Manchester Avenue.* Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS).
- *Lincoln Boulevard/Venice Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 2. Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Sepulveda Boulevard/Manchester Avenue.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6. Contribute to the design and implementation of a Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor. Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS).
- *Sepulveda Boulevard/I-105 WB Off-Ramp.* Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS).
- *Sepulveda Boulevard/76th and 77th Streets.* Contribute to the design and implementation of a Limited Bus Service between the Proposed Project, Howard Hughes Center and the Century Boulevard Office Corridor.
- *Bundy Drive/Ocean Park Boulevard.* Contribute to the design and implementation of Smart Corridor System Adaptive Traffic Control Systems (ATCS).
- *Bluff Creek Drive/Centinela Avenue.* Restripe northbound Bluff Creek Drive to have a left-turn lane, two through lanes and two right-turn lanes.
- *Lincoln Boulevard/La Tijera Boulevard.* Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS).



- *Sepulveda Boulevard/79th and 80th Streets.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6. Contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Sepulveda Boulevard/Westchester Parkway.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6.
- *Centinela Avenue/Venice Boulevard.* Restripe to provide a separate southbound right turn lane so that this Centinela Avenue approach would have a separate right turn lane, two through lanes and a single left turn lane. Contribute to the design and implementation of Smart Corridor System Adaptive Traffic Control Systems (ATCS).
- *Centinela Avenue/Culver Boulevard.* Provide a westbound right turn lane so that the Culver Boulevard westbound approach would have a separate right turn lane, two through lanes and a single left turn lane.
- *Inglewood Boulevard/Culver Boulevard.* Provide left-turn lanes along eastbound and westbound Culver Boulevard, such that the eastbound and westbound approaches would each have a separate left-turn lane, a through lane and a shared through-right turn lane.
- *Centinela Avenue/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard. Also, contribute to the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall and its environs. Contribute to the design and implementation of the Limited Bus Service serving the Proposed Project, Howard Hughes Center and the Century Boulevard Office Corridor.
- *Culver Boulevard/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard.
- *Lincoln Boulevard/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard. Contribute to the design and implementation of the expanded internal shuttle system serving the Marina del Rey area. Also, contribute to the design and

early implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.

- *La Cienega Boulevard/Centinela Avenue.* Contribute to the design and implementation of Airport System Adaptive Traffic Control Systems (ATCS).
- *Sepulveda Boulevard/La Tijera Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 6. Contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Lincoln Boulevard/Marina Expressway (SR 90).* Contribute to the design and implementation of Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Maxella Avenue.* Contribute to the design and implementation of Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Washington Boulevard.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Bluff Creek Drive.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Loyola Marymount (LMU) Drive.* Contribute to design and implementation of Transit Priority System (signal system components) along Lincoln Boulevard. Also, contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor, and provide for the expansion of the internal shuttle system.
- *Inglewood Boulevard/Jefferson Boulevard.* Implement the Regional Bus enhancements providing additional service along the Culver City Bus Line 4 and its extension between Fox Hills Mall and Playa del Rey along Jefferson Boulevard, and towards additional service along the Culver City Bus Line 2. Also, contribute to the design and implementation of the expanded internal shuttle system serving the Fox Hills Mall and its environs. Contribute to the design and implementation of the Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.

- *Campus Center Drive.* Provide for full public vehicular access on Campus Center Drive between Bluff Creek Drive and Millennium, through a public access agreement, irrevocable offer to dedicate, or other mechanism acceptable to LADOT and the Department of Public Works.

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles City Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles City Department of Public Works

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** At the implementation of each subphase described in the Subphasing Plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or guarantee provided in accordance with the Subphasing Plan, or issuance of a “B” Permit (see Subphasing Plan, Attachment E)

### County of Los Angeles

- K.(1)-9** The Proposed Project shall provide the following intersection improvements to the satisfaction of the Los Angeles County Department of Public Works (LACDPW).
- *Admiralty Way/Mindanao Way.* Contribute to the design and implementation of an expanded internal shuttle system serving the Marina del Rey area.
  - *Palawan Way/Admiralty Way.* Contribute a fair share towards the intersection improvement consistent with the Los Angeles County Department of Public Works proposed Admiralty Way Corridor Improvements. The improvement required by the Proposed Project consists of providing dual southbound left turn lanes which is consistent with the County planned improvements at this location. The southbound approach would have dual southbound left-turn lanes, a through lane and a separate right-turn lane.
  - *Sherbourne Drive/Centinela Avenue.* Contribute to the design and implementation of ATCS or any other signal system enhancement similar to it.
  - *Lincoln Boulevard/Marina Freeway.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.

- *Lincoln Boulevard/Bali Way.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.
- *Lincoln Boulevard/Fiji Way.* Contribute to the design and implementation of a Transit Priority System (signal system components) along Lincoln Boulevard. Contribute to the design and implementation of an expanded internal shuttle system serving the Marina del Rey area.
- *Lincoln Boulevard/Mindanao Way.* Contribute to the design and early implementation of a Transit Priority System (signal system components) along Lincoln Boulevard.

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles County Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles County Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or guarantee provided in accordance with the Subphasing Plan (see Subphasing Plan, Attachment E)

### City of Culver City

**K.(1)-10** The following intersection improvements shall be provided in a manner satisfactory to the City of Culver City:

- *Sepulveda Boulevard/Centinela Avenue.* Contribute to the design and implementation of ATCS. Implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 6; and the design and implementation of the expanded internal shuttle system serving Howard Hughes Center. Contribute to the design and implementation of Limited Bus Service serving Howard Hughes Center and the Century Boulevard Office Corridor.
- *Inglewood Boulevard/Washington Boulevard.* Implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 2.

- *Jefferson Boulevard/Overland Avenue.* Implement the Regional Bus enhancements providing additional service (2 buses) along the Culver City Bus Line 4 and its extension.
- *Sepulveda Boulevard/Jefferson Boulevard and Playa Street.* Implement the Regional Bus enhancements providing additional service (two buses) along the Culver City Bus Line 4 and its extension. Also, contribute to the design and implementation of additional service (1 bus) along the Culver City Bus Line 6.
- *Sepulveda Boulevard/Slauson Avenue.* Implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 6.
- *Green Valley Circle/Centinela Avenue* – Restripe in order to provide a separate westbound right turn lane on Centinela Avenue. The westbound approach would have a separate right lane, and two through lanes.
- *Centinela Avenue/Washington Place* – Add a second left turn lane to both eastbound and westbound approaches on Washington Place. The eastbound approach would have dual lefts, a shared through-right and separate through lane. The westbound approach would have dual lefts, two through lanes and a separate right turn lane.
- *Overland Avenue/Culver Boulevard.* Add a right turn lane along the westbound approach on Culver Boulevard. This approach would have a separate right-turn lane, a left-turn lane and two through lanes. In addition, provide a southbound right-turn only lane on Overland Avenue at this location resulting in a separate right-turn lane, two through lanes and dual left-turn lanes.
- *Sepulveda Boulevard/Culver Boulevard.* Implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 6.
- *Sawtelle Boulevard/Culver Boulevard.* Contribute towards provision of separate northbound and southbound right-turn lanes along Sawtelle Boulevard consistent with the Caltrans' proposed improvement at this location. Both north- and southbound Sawtelle Boulevard approaches would have a separate right-turn lane, two through lanes and a left-turn lane.
- *Hannum Avenue/Playa Street.* Implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 2.

- *Jefferson Boulevard/Duquesne Avenue.* Implement the Regional Bus enhancements providing additional service (2 buses) along the Culver City Bus Line 4 and its extension.
- *Centinela Avenue/Washington Boulevard.* Implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 2.
- *Jefferson Boulevard/Sepulveda Boulevard (N).* Implement the Regional Bus enhancements providing additional service (2 buses) along the Culver City Bus Line 4 and its extension.
- *Sepulveda Boulevard/Sawtelle Boulevard.* Implement the Regional Bus enhancements providing additional service (2 buses) along the Culver City Bus Line 4 and its extension. Also, implement the Regional Bus enhancements providing additional service (1 bus) along the Culver City Bus Line 6.

**Enforcement Agency:** Los Angeles City, Department of Transportation; City of Culver City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; Culver City, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or guarantee provided in accordance with the Subphasing Plan (see Subphasing Plan, Attachment E)

### City of Inglewood

**K.(1)-11** The following intersection improvements shall be provided in a manner satisfactory to the City of Inglewood Department of Public Works.

- *Aviation Boulevard/Manchester Boulevard.* Contribute to the design and implementation of ATCS or any other similar computerized signal system enhancement.

- *La Brea Avenue/Centinela Avenue*. Restripe in order to add a westbound right-turn lane on Centinela Avenue. The westbound approach would have a right, a left and two through lanes.

**Enforcement Agency:** Los Angeles City, Department of Transportation; City of Inglewood, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; City of Inglewood, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or guarantee provided in accordance with the Subphasing Plan (see Subphasing Plan, Attachment E)

### City of El Segundo

**K.(1)-12** Proposed improvements to the following intersection (which lies on the boundary of the City of El Segundo and the City of Los Angeles) shall be required in a manner satisfactory to the respective City Departments of Transportation/Public Works.

- *Sepulveda Boulevard/Imperial Highway (El Segundo)*. Contribute to the design and implementation of ATCS at this location or a similar signal system enhancement program.

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles County Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles County Department of Public Works; City of El Segundo, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or guarantee provided in accordance with the Subphasing Plan (see Subphasing Plan, Attachment E)

---

**Caltrans**

**K.(3)-13** The following improvements, which are described above, are located on State Roadways and shall be implemented to the satisfaction of Caltrans working closely with the jurisdictions in which the cross-streets are located. The proposed improvements at each of these intersection locations are described in more detail under the discussion of the mitigation measures for the various other jurisdictions, above. These improvements shall be coordinated with the City of Los Angeles, the County of Los Angeles, and El Segundo as applicable. They include the following locations:

1. Lincoln Boulevard (SR 1)/Marina Freeway (SR 90) intersection (Contribution to Transit Priority System (signal system components) (City of Los Angeles)
2. Lincoln Boulevard/Maxella Avenue (City of Los Angeles)
3. Lincoln Boulevard/Venice Boulevard (City of Los Angeles)
4. Lincoln Boulevard/Washington Boulevard (City of Los Angeles)
5. Lincoln Boulevard/83rd Street (City of Los Angeles)
6. Venice Boulevard/Centinela Avenue (City of Los Angeles)
7. Sepulveda Boulevard/I-105 WB off-ramp (City of Los Angeles)
8. Sepulveda Boulevard/Imperial Highway (City of Los Angeles/El Segundo)
9. I-405 NB ramps/Jefferson Boulevard (City of Los Angeles)
10. I-405 SB ramps/Jefferson Boulevard (City of Los Angeles)
11. Lincoln Boulevard/Jefferson Boulevard (City of Los Angeles)
12. Lincoln Boulevard/Bluff Creek Drive (City of Los Angeles)
13. Lincoln Boulevard/Loyola Marymount University (LMU) Drive (City of Los Angeles)
14. Lincoln Boulevard/Fiji Way (Los Angeles County)
15. Lincoln Boulevard/ Mindanao Way (Los Angeles County)
16. Lincoln Boulevard/ Bali Way (Los Angeles County)
17. Lincoln Boulevard/Manchester Boulevard (City of Los Angeles)



## 18. Lincoln Boulevard/La Tijera Boulevard (City of Los Angeles)

**Enforcement Agency:** Los Angeles City, Department of Transportation; Los Angeles County Department of Public Works; Caltrans

**Monitoring Agency:** Los Angeles City, Department of Transportation; Los Angeles County Department of Public Works; Caltrans

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or guarantee provided in accordance with the Subphasing Plan (see Subphasing Plan, Attachment E)

### Neighborhood Traffic Management

**K.(1)-14** Pursuant to the schedule established in the final adopted subphasing program, the project applicant shall provide a funding mechanism acceptable to the Los Angeles Department of Transportation (LADOT) for necessary City staff support for development of neighborhood traffic management plan(s) and for subsequent implementation of traffic calming measures contained in the plan(s). Development of a plan for any particular community would be initiated at the request of the residents in the community. Eligible communities would consist of the residential neighborhoods within the boundaries listed below:

- Inglewood Boulevard, Ballona Creek, Sawtelle Boulevard, Bray Street/Port Road
- Kentwood Avenue, 77th Street, Sepulveda Boulevard, Manchester Avenue
- Sepulveda Boulevard, 74th Street, La Tijera Boulevard, Manchester Avenue
- Rayford Drive, 83rd Street, Lincoln Boulevard, La Tijera Boulevard

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation

**Monitoring Phase:** Pre-Construction; Post-Construction

**Monitoring Frequency:** At the implementation of each subphase described in the subphasing plan (see Attachment E)

**Action Indicating Compliance with Mitigation Measure(s):** Funding or other financial guarantee provided in accordance with the Subphasing Plan (see Subphasing Plan, Attachment E)

---

## Construction Impact Measures

### Mitigation Measures for the Proposed Project and the Equivalency Program

- K.(1)-15** Prior to the issuance of any building or grading permit for the Project, construction traffic management plans, including street closure information, detour plans, haul routes, and staging plans shall be prepared, satisfactory to the Los Angeles Department of Transportation (LADOT). All construction contracts shall include provisions requiring compliance with the approved construction traffic management plans. Construction traffic management plans shall include, but are not limited to, the following:
- Notify residents and business owners ahead of construction activity which may affect traffic through signage, advertisements, or other means, as appropriate
  - Configure construction parking to minimize traffic interference to the extent feasible.
  - Provide temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).
  - Schedule construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
  - Reroute construction trucks off congested streets.
  - Consolidate truck deliveries.
  - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, to the extent feasible.
  - Construction-related vehicles shall not park on any residential street, with the exception of active construction sites within the Project.
  - No construction activity shall block access to any residence or place of business, without prior notice.
  - Safety precautions shall be provided for pedestrians and bicyclists through such measures as alternate routing, and protection barriers.
  - All contractors shall be required to participate in a common carpool registry during all periods of contract performance monitored and maintained by the Applicant's Monitor.
  - All construction-related deliveries, other than concrete and earthwork-related deliveries, shall be restricted to non-peak travel periods to the extent feasible.

- The construction manager or designee for each construction project shall notify the LAUSD's Transportation Branch and the local school administrator regarding the expected start and ending dates for Project construction that may affect existing pedestrian and vehicular routes serving Playa del Rey School.
- No staging or parking of construction vehicles, including vehicles to transport workers, shall occur on streets adjacent to Playa del Rey School.
- The Pedestrian Routes Map (Attachment F to the MMRP) shall be reviewed, and potential safety issues identified in the preparation of the Construction Traffic Management Plan.

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation, Department of Building and Safety

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at execution of construction contract; monthly during construction.

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any permit for the project; Evidence these provisions are included in construction contracts; Monthly Statements of Compliance.

- K.(1)-16** Construction vehicle travel through neighboring jurisdictions other than the City of Los Angeles shall be conducted in accordance with the standard rules and regulations established by the respective jurisdictions where such jurisdictions would be subject to construction impacts. These include allowable operating times for construction activities, truck haul routes, clearance requirements, etc.

**Enforcement Agency:** Los Angeles City, Department of Transportation

**Monitoring Agency:** Los Angeles City, Department of Transportation

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at execution of construction contract; monthly during construction.

**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contract with mitigation measure provisions; Monthly Statements of Compliance.

- K.(1)-17** Prior to the issuance of any grading permit for the Project, required permits for the truck haul routes shall be obtained from Los Angeles Department of Transportation (LADOT), Caltrans, and other affected jurisdictions.

**Enforcement Agency:** Los Angeles City, Department of Transportation; Caltrans; other affected jurisdictions, as applicable

**Monitoring Agency:** Los Angeles City, Department of Transportation; Caltrans; other affected jurisdictions, as applicable

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of haul route permits

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of haul route permits

### **Additional Construction Mitigation for the Off-Site Improvements**

**K.(1)-18** The following off-site measures shall apply:

- Notify residents and business owners ahead of construction activity which may affect traffic through signage, advertisements, or other means, as appropriate
- Provide temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).
- Schedule construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
- Reroute construction trucks off congested streets.
- Consolidate truck deliveries.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site, to the extent feasible.
- Construction-related vehicles shall not park on any residential street, with the exception of active construction sites within the Project.
- No construction activity shall block access to any residence or place of business, without prior notice.
- Safety precautions shall be provided for pedestrians and bicyclists through such measures as alternate routing, and protection barriers.
- The construction manager or designee for each construction project shall notify the LAUSD's Transportation Branch and the local school administrator regarding the expected start and ending dates for Project construction that may affect existing pedestrian and vehicular routes serving Playa del Rey School.

- The Pedestrian Routes Map (Attachment F to the MMRP) shall be reviewed, and potential safety issues identified in the preparation of the Construction Traffic Management Plan.
- There shall be coordination with applicable transit agencies for temporary alternative pick-up/drop-off points if bus stops are affected by construction of the off-site improvements.

**Enforcement Agency:** Los Angeles City, Department of Transportation; other local, county or state jurisdictions, as applicable

**Monitoring Agency:** Los Angeles City, Department of Transportation; other local, county or state jurisdictions, as applicable

**Monitoring Phase:** Pre-Construction, Construction

**Monitoring Frequency:** Once at issuance of applicable permits.

**Action Indicating Compliance with Mitigation Measure(s):** Evidence provided that construction contracts include these measures.

- K.(1)-19** There shall be coordination with applicable transit agencies for temporary alternative pick-up/drop-off points if bus stops are affected by construction of the off-site improvements.

**Enforcement Agency:** Los Angeles City, Department of Transportation; other local, county or state jurisdictions, as applicable

**Monitoring Agency:** Los Angeles City, Department of Transportation; other local, county or state jurisdictions, as applicable

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at issuance of applicable permits

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permits; statement of compliance

## **L. PUBLIC SERVICES**

### **L.(1) Fire Protection**

- L.(1)-1** If the proposed fire station required for the adjacent First Phase Project is not built prior to the issuance of the first building permit, an agreement shall be reached between the Applicant and the Fire Department which provides for adequate fire services/facilities by the Department.

**Enforcement Agency:** Los Angeles City, Fire Department

**Monitoring Agency:** Los Angeles City, Fire Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once prior to issuance of building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Compliance statement issued by Fire Department.

- L.(1)-2** Prior to the issuance of any building permit, a plot plan shall be submitted to the City Fire Department for approval.

**Enforcement Agency:** Los Angeles City, Fire Department

**Monitoring Agency:** Los Angeles City, Fire Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of a building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Plot plan approval by Fire Department.

- L.(1)-3** Prior to the issuance of any building permit, definitive plot plan and specifications including fire prevention features for the Project shall be submitted to and approved by the City Fire Department. Sprinklers may be required after review of the plot plans.

**Enforcement Agency:** Los Angeles City, Fire Department

**Monitoring Agency:** Los Angeles City, Fire Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of a building permit.

**Action Indicating Compliance with Mitigation Measure(s):** Plot plan approval by Fire Department

- L.(1)-4** Adequate off-site public and on-site private fire hydrants shall be required. The exact number and location of the hydrants shall be determined after the City Fire Department reviews the plot plan. The Project Developer shall be required to pay for any hydrant installations required by the Fire Department.

**Enforcement Agency:** Los Angeles City, Fire Department

**Monitoring Agency:** Los Angeles City, Fire Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at plot plan review

- Action Indicating Compliance with Mitigation Measure(s):** Plot plan approval by Fire Department
- L.(1)-5** Adequate vehicular accessways around all multi-story buildings shall be required by the Fire Department where buildings exceed 28 feet in height.
- Enforcement Agency:** Los Angeles City, Fire Department
- Monitoring Agency:** Los Angeles City, Fire Department
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at issuance of building permit
- Action Indicating Compliance with Mitigation Measure(s):** Plot plan approval by Fire Department
- L.(1)-6** Where fire apparatus will be driven onto the road level surface of a subterranean parking structure, the structural foundation of the subterranean parking structures shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot.
- Enforcement Agency:** Los Angeles City, Fire Department
- Monitoring Agency:** Los Angeles City, Fire Department
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at issuance of building permit
- Action Indicating Compliance with Mitigation Measure(s):** Plot plan approval by Fire Department
- L.(1)-7** To mitigate potential significant impacts on access, the Applicant shall covenant that all current public and private streets shall remain open to free travel of emergency vehicles.
- Enforcement Agency:** Los Angeles City, Fire Department
- Monitoring Agency:** Los Angeles City, Fire Department
- Monitoring Phase:** Pre-Construction; Post-Construction
- Monitoring Frequency:** Once at map recordation
- Action Indicating Compliance with Mitigation Measure(s):** Recordation of covenant and agreement
- L.(1)-8** The Applicant shall provide for all infrastructure improvement, including water main improvements, and/or expansion necessary to meet City Fire Department fire flow standards, in accordance with a phasing schedule to the satisfaction of the City Fire Department.

**Enforcement Agency:** Los Angeles City, Fire Department

**Monitoring Agency:** Los Angeles City, Fire Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at first final map recordation

**Action Indicating Compliance with Mitigation Measure(s):** Recordation of covenant and agreement

**L.(2) Police Protection**

**L.(2)-1** Prior to the issuance of the first building permit, the Applicant shall consult with the Los Angeles Police Department, Pacific Division, regarding site-wide crime prevention features, which may include: provision of call boxes in parks and/or other strategic locations for police and medical emergencies; payphones restricted to outgoing calls only; and “graffiti” cameras in strategic locations to discourage problem graffiti areas from arising.

**Enforcement Agency:** Los Angeles City, Police Department

**Monitoring Agency:** Los Angeles City, Police Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once issuance of first building permit

**Action Indicating Compliance with Mitigation Measure(s):** Compliance statement from Police Department

**L.(2)-2** Prior to the issuance of each temporary or permanent Certificate of Occupancy, a diagram of the Proposed Project shall be provided to the Pacific Area Commanding Officer which will include access routes, unit numbers (as available), and any additional information that would facilitate police response.

**Enforcement Agency:** Los Angeles City, Police Department

**Monitoring Agency:** Los Angeles City, Police Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of each temporary or permanent certificate of occupancy

**Action Indicating Compliance with Mitigation Measure(s):** Compliance statement from Police Department

**L.(2)-3** Prior to the issuance of each building permit, the Applicant shall incorporate crime prevention features pursuant to the Los Angeles Police Department (LAPD) Pacific



Division and the LAPD Crime Prevention Unit appropriate to the design of the property involved in the Proposed Project. Those may include the following elements:

- The incorporation of access for emergency service personnel and vehicles including provision of security access codes for police personnel;
- Standard security measures for residential and employee access to buildings;
- Use of video cameras and private security guards to monitor and patrol the project site during project construction and operation;
- Entryways, elevators, lobbies and parking areas with lighting that eliminates areas of concealment; and
- Solid core doors with deadbolt locks to all offices, shops, and hotel units.

**Enforcement Agency:** Los Angeles City, Police Department

**Monitoring Agency:** Los Angeles City, Police Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of each building permit

**Action Indicating Compliance with Mitigation Measure(s):** Compliance statement from Police Department

### L.(3) Schools

None proposed.

### L.(4) Parks and Recreation

#### Mitigation Measures for the Proposed Project and the Equivalency Program

- L.(4)-1** 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)

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at Tentative Subdivision Map approval for on-site parks; once at Final Tract Map Recordation for off-site parks

**Action Indicating Compliance with Mitigation Measure(s):** Approval of Tentative Tract Map showing on-site park space; identification of off-site park locations and acceptable guarantee to provide off-site parks

- L.(4)-2** Prior to the issuance of the temporary or permanent Certificate of Occupancy for each 455 residential units, two acres of parks shall be provided and improved within the Project site; and an additional acre of off-site parks shall be provided concurrently (i.e., three acres in total), per the provisions outlined in the preceding mitigation measure.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once prior to the issuance of the temporary or permanent Certificate of Occupancy for each 455 dwelling units

**Action Indicating Compliance with Mitigation Measure(s):** Identification of parks on recorded final map; recordation of covenants and agreements; funding or other acceptable guarantee of park improvements

- L.(4)-3** Prior to the recordation of any phase of the tract map for the Proposed Project, the required on-site and off-site parks shall be identified, including improvement and maintenance responsibilities, satisfactory to the local Council Office.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at recordation of any final map.

**Action Indicating Compliance with Mitigation Measure(s):** Approval of Tentative Tract Map showing on-site park space; identification of off-site park locations and acceptable guarantee to provide off-site parks

- L.(4)-4** In addition to the provision of park space identified above, the Proposed Project shall be responsible for providing improvements for the parks within the Project 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. The cost of the park improvements shall not be less than and is not limited by the amount of fees that the Project would be required to pay under LAMC Section 17.12D as though the Proposed Project was not dedicating any land for parks.

- Enforcement Agency:** Los Angeles City, Department of City Planning  
**Monitoring Agency:** Los Angeles City, Department of City Planning  
**Monitoring Phase:** Pre-Construction  
**Monitoring Frequency:** Once at final map recordation  
**Action Indicating Compliance with Mitigation Measure(s):** Recordation of final map; Recordation of covenant and agreement
- L.(4)-5** Prior to recordation of any phase of the tract map for the Proposed Project, the applicant shall submit to the Advisory Agency for approval, in consultation with the Department of Recreation and Parks and the local Council office, a plan for the improvement of the parks to be provided by the Proposed Project.
- Enforcement Agency:** Los Angeles City, Department of City Planning  
**Monitoring Agency:** Los Angeles City, Department of City Planning  
**Monitoring Phase:** Pre-Construction  
**Monitoring Frequency:** Once at recordation of any final map.  
**Action Indicating Compliance with Mitigation Measure(s):** Advisory agency approval of park improvement plan
- L.(4)-6** Prior to recordation of any phase of the tract maps, all parks within the Proposed Project in such tract map shall either be designated as active open space on such final tract maps or committed to open space through recorded deed restrictions and covenants, subject to the approval of the Advisory Agency.
- Enforcement Agency:** Los Angeles City, Department of City Planning  
**Monitoring Agency:** Los Angeles City, Department of City Planning  
**Monitoring Phase:** Pre-Construction  
**Monitoring Frequency:** Once at recordation of first final map.  
**Action Indicating Compliance with Mitigation Measure(s):** Recordation of first final map
- L.(4)-7** Prior to recordation of tract maps, lots designated for parks in tentative maps shall be offered for dedication to the Department of Recreation and Parks. If the Department of Recreation and Parks does not accept dedication of the park areas, a property owners' association shall be formed to maintain the park and recreational facilities in a manner satisfactory to the City of Los Angeles, together with provision for public access to the parks and the appropriate trails and easements guaranteed to the City. The property owners' maintenance responsibility for the park/recreational facilities shall be recorded in a Conditions, Covenants and Deed Restrictions (CC & R) and a Covenant and

Agreement. Any Covenant and Agreement to maintain park, open space and recreational fields/facilities shall be reviewed by the City Attorney prior to its acceptance by the Advisory Agency. Said covenant and agreement shall be recorded at tract map recordation. The property owner's association shall enter into a usage agreement with the Department of Recreation and Parks if requested.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at final map recordation

**Action Indicating Compliance with Mitigation Measure(s):** Recordation of final map, covenant and agreement, and Covenants, Conditions and Restrictions.

### **Additional Mitigation Measure for the Equivalency Program**

**L.(4)-8** Additional park space shall be provided at the rate of 0.12 acre for every 50 assisted living units developed.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at building permit for any assisted living units

**Action Indicating Compliance with Mitigation Measure(s):** Identification of park location and acceptable guarantee to provide parks

### **L.(5) Libraries**

None proposed.

## **M. ENERGY CONSUMPTION**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

**M-1** The Applicant and builders shall consult with the Los Angeles Department of Water and Power (LADWP) and the Southern California Gas Company (SCGC) to maximize gains in building design efficiency & reduce building energy requirements to the extent feasible. Technologies and site design features to be considered include high performance glass (low-e & heat mirror), increased R value insulation, natural

ventilation strategies, solar building orientation, daylighting strategies & shade tree planting, which shall be incorporated into the final building plans to the extent feasible.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City; Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City; Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance from LADWP and SCGC, as applicable

**M-2** All buildings shall employ passive heating and cooling design strategies to the extent feasible. Strategies to be considered include orientation; natural ventilation, including cross-ventilation in residential units; high insulation values, energy efficient windows including high performance glass; daylighting (in commercial buildings); light-colored or high-albedo (reflective) roofing and exterior walls; window shading; and landscaping that provides shading during the appropriate seasons, especially of the south and west exposures.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City; Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of Building and Safety; Los Angeles City; Department of City Planning

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of building permit and plot plan review

**Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable

**M-3** All buildings shall utilize energy efficient mechanical and electrical systems to the extent feasible. Strategies to be considered in commercial buildings include efficient heating, ventilation and air conditioning (HVAC) equipment; variable air volume systems; air economizer cycles that utilize 100% outside air when appropriate; under floor air distribution; and building control systems for lighting, HVAC and other systems. Strategies to be considered in residential buildings include fans to assist natural ventilation; centralized water and space conditioning systems; high efficiency individual heating and cooling units; and automatic setback thermostats.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Building and Safety

- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Once at issuance of building permit; once at issuance of temporary or permanent Certificate of Occupancy.
- Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable
- M-4** Solar systems shall be installed to supplement the heating of all swimming pools as well as hot tubs when provided together with swimming pools, to the extent feasible.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Construction
- Monitoring Frequency:** Once at issuance of temporary or permanent Certificate of Occupancy
- Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable
- M-5** All residential buildings shall be equipped with Energy-Star rated appliances, where applicable.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Once at issuance of building permit; once at issuance of temporary or permanent Certificate of Occupancy
- Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable
- M-6** Energy efficient lighting, which exceeds the California Title 24 Energy Efficiency standards to the extent feasible, shall be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are not needed shall also be used to regulate interior lighting for office common spaces, such as conference rooms and bathrooms.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Pre-Construction; Construction

- Monitoring Frequency:** Once at issuance of building permit; once at issuance of temporary or permanent Certificate of Occupancy
- Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable
- M-7** All fixtures used for exterior lighting of common areas shall be regulated by automatic devices to turn off lights when they are not needed. Energy efficient exterior lighting fixtures, as might be specified by the LADWP, shall be used to the extent such lighting is available and feasible.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Once at issuance of building permit; once at issuance of Certificate of Occupancy
- Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable
- M-8** All residential and commercial buildings shall be equipped with electric vehicle charging stations to the extent required by the California Air Resources Board at the time of construction of the given building.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Pre-Construction; Construction
- Monitoring Frequency:** Once at issuance of building permit; once at issuance of temporary or permanent Certificate of Occupancy
- Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable
- M-9** Shade producing trees shall be planted at the Proposed Project site to the extent feasible to provide localized as well as overall community cooling.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety, Planning Department
- Monitoring Agency:** Los Angeles City, Department of Building and Safety, Planning Department
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at plot plan review

**Action Indicating Compliance with Mitigation Measure(s):** Approval of plot plan

**M-10** All buildings shall employ passive heating and cooling design strategies to the extent feasible.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable

**M-11** All buildings shall be designed to accommodate renewable energy sources, to the extent feasible.

**Enforcement Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance with LADWP and SCGC, as applicable

## **N. UTILITIES**

### **Mitigation Measures for the Proposed Project and the Equivalency Program**

#### **N.(1) Water Consumption**

**N.(1)-1** Prior to issuance of any building permit, on and off-site water infrastructure for potable and recycled water necessary for the development approved under such permit shall be constructed or suitably guaranteed, satisfactory to the City of Los Angeles' Department of Water and Power, Department of Public Works and Department of Transportation, California Department of Health Services and Department of Transportation (Caltrans), and the West Basin Municipal Water District, as applicable. Off -site water infrastructure shall consist of construction of a regulator station south of the Jefferson Boulevard/Mesmer Street intersection and provision of design and construction fees to provide a back-up source of emergency water supply to serve the project area.



**Enforcement Agency:** City of Los Angeles, Department of Water and Power

**Monitoring Agency:** City of Los Angeles, Department of Water and Power,  
Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any building permit

- N.(1)-2** The Project shall install low-flow toilets, low-flow showerheads, low-flow fixtures, and Energy Star rated appliances (dishwashers and washing machines, if built in), where applicable.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of Building Permit

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of building plans incorporating these measures

- N.(1)-3** In office, retail, and other public buildings, water faucet fixtures with activators shall be installed that automatically shut off the flow of water when not in use.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of Building Permit

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of building plans incorporating these measures

- N.(1)-4** If available, reclaimed water shall be used for irrigation, office building toilet flushing, and office building cooling towers.

**Enforcement Agency:** City of Los Angeles, Department of Water and Power,  
Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Water and Power

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of building plans incorporating these measures

**N.(1)-5** Compliance with all applicable water conservation ordinances (No. 170,978 and subsequent ordinances) shall be required.

**Enforcement Agency:** City of Los Angeles, Department of Water and Power, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Water and Power, Planning Department

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any building permit; landscape approval with water conservation ordinance provisions

**N.(1)-6** Automatic sprinkler systems shall be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. Sprinklers shall be reset to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

**Enforcement Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Agency:** City of Los Angeles, Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of Building Permit

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of any Building Permit; landscape/plot plan approval with the provisions of this measure

## **N.(2) Wastewater**

**N.(2)-1** Prior to issuance of any building permit, construction of on-site infrastructure improvements necessary for the conveyance of project wastewater to the 42" Marina Interceptor Sewer in Jefferson Boulevard shall be completed, or suitably guaranteed, to the satisfaction of the City Department of Public Works and other applicable responsible agencies.

**Enforcement Agency:** Los Angeles City, Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of any building permit

**Action Indicating Compliance with Mitigation Measure(s):** Compliance statement from Department of Public Works

**N.(3) Solid Waste**

**N.(3)-1** All buildings constructed or uses established within any part of the site shall be designed to be permanently equipped with clearly marked, durable, commingled recyclables bins at all times to facilitate the separation and deposit of recyclable materials therein by tenants and grounds keepers; and the placement of, and approaches to, such bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities, in a manner satisfactory to the City Department of Public Works, prior to issuance of building permits.

**Enforcement Agency:** Los Angeles City, Department of Public Works (Bureau of Sanitation), Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of Public Works (Bureau of Sanitation), Department of Building and Safety

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of building permit

**Action Indicating Compliance with Mitigation Measure(s):** Building plans incorporating these measures

**N.(3)-2** The Applicant shall execute a covenant satisfactory to the City Planning Department which shall obligate the owner, lessee, heirs, assigns, or successors to: continuously maintain in good order for the convenience of tenants, clearly marked, durable and separate bins on the same lot, or parcel to facilitate the commingled recyclables and deposit of recyclable or commingled waste metal, cardboard, paper, glass, and plastic therein; maintain accessibility to such bins at all times, for collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities as feasible and appropriate.

**Enforcement Agency:** Los Angeles City, Department of Planning

**Monitoring Agency:** Los Angeles City, Department of Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at map recordation

**Action Indicating Compliance with Mitigation Measure(s):** Execution of covenant and agreement

- N.(3)-3** The Applicant and its successors, including future buyers or lessees of the property, heirs, and assigns, shall comply with applicable existing and future regulations and procedures for the collection and disposal of household hazardous waste, providing such future compliance does not conflict with existing tract map requirements.
- Enforcement Agency:** Los Angeles City, Department of City Planning
- Monitoring Agency:** Los Angeles City, Department of City Planning
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at map recordation
- Action Indicating Compliance with Mitigation Measure(s):** Execution of covenant and agreement
- N.(3)-4** The Applicant and its successors, including future buyers or lessees of the property, heirs, and assigns, shall be required to implement a recycling program for demolition and construction debris, where economically feasible, to the satisfaction of the City Departments of Public Works, Building and Safety, and/or City Planning, as applicable.
- Enforcement Agency:** Los Angeles City, Department of Public Works; Los Angeles City, Department of City Planning; Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Public Works; Los Angeles City, Department of City Planning; Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Construction
- Monitoring Frequency:** Once at approval of recycling program; once at execution of grading or construction contract; submittal of monthly report during construction
- Action Indicating Compliance with Mitigation Measure(s):** Approval of recycling program; issuance of construction contracts with mitigation measure provisions ; submittal of monthly report during construction
- N.(3)-5** Recycled materials, including drywall, steel, aluminum, ceramic tile, cellulose insulation and composite engineered wood products, shall be incorporated into building design and construction where economically feasible and where compatible with design objectives.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety; Planning Department
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at issuance of any building permit

- Action Indicating Compliance with Mitigation Measure(s):** Building plans incorporating these measures; plot plan approval with these measures
- N.(3)-6** Determination of new solid waste collection routes shall be coordinated with existing collection routes in the project area, depending on the waste haulers serving the Proposed Project site.
- Enforcement Agency:** Los Angeles City, Department of Public Works
- Monitoring Agency:** Los Angeles City, Department of Public Works, Planning Department
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at issuance of building permit
- Action Indicating Compliance with Mitigation Measure(s):** Issuance of building permits; statement of compliance from waste hauler

**O. VISUAL QUALITIES**

**Mitigation Measures for the Proposed Project and the Equivalency Program**

- O-1** Prior to recordation of tract maps, parks/open space, and major open space areas, such as the riparian corridor, and bluffs, shall either be designated as open space on final tract maps or committed to open space through recorded deed restrictions and covenants, subject to the approval of the Advisory Agency.
- Enforcement Agency:** Los Angeles City, Department of City Planning
- Monitoring Agency:** Los Angeles City, Department of City Planning
- Monitoring Phase:** Pre-Construction
- Monitoring Frequency:** Once at recordation of the first final tract map
- Action Indicating Compliance with Mitigation Measure(s):** Recordation of tract map
- O-2** All rooftop structures (including mechanical equipment), garbage dumpsters, and other unsightly equipment, shall not be visible from the adjoining street.
- Enforcement Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Agency:** Los Angeles City, Department of Building and Safety
- Monitoring Phase:** Pre-Construction; Construction and Post-Construction

**Monitoring Frequency:** Once at plan check; temporary or permanent certificate of occupancy

**Action Indicating Compliance with Mitigation Measure(s):** Temporary or permanent certificate of occupancy

**O-3** Open areas not used for streets, walkways, plazas, and other hardscape areas or driveways shall be landscaped. Structures which face onto public thoroughways shall be attractively landscaped with a landscape plan prepared by a licensed landscape architect, and shall be subject to review and approval from the Planning Department and Bureau of Street Maintenance, Street Tree Division.

**Enforcement Agency:** Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

**Monitoring Agency:** Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of “B” permit; once at plot plan review

**Action Indicating Compliance with Mitigation Measure(s):** Issuance of “B” permits; approval of plot plans

#### **Additional Mitigation Measures for the Off-Site Improvements**

**O-4** Existing trees affected by construction at off-site locations shall be relocated in proximity to their current locations if sufficient space is available. If trees cannot be located in immediate proximity, then trees shall be replaced at alternate locations in a public parkway location with similar specimens at a ratio of not less than one-to-one.

**Enforcement Agency:** Los Angeles City, Bureau of Street Maintenance, Street Tree Division; City of Culver City, Department of Public Works; Los Angeles County Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division; City of Culver City, Department of Public Works; Los Angeles County Department of Public Works

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at issuance of applicable permit for off-site improvements

**Action Indicating Compliance with Mitigation Measure(s):** Approval of applicable permits for off-site improvements incorporating the provisions of this measure

**O-5** Landscaping plans shall be prepared for each of the off-site road improvements that impact landscaping and shall be submitted to the appropriate regulatory agencies for approval

**Enforcement Agency:** Los Angeles City, Bureau of Street Maintenance, Street Tree Division; City of Culver City, Department of Public Works; Los Angeles County Department of Public Works

**Monitoring Agency:** Los Angeles City, Department of City Planning; Bureau of Street Maintenance, Street Tree Division; City of Culver City, Department of Public Works; Los Angeles County Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of applicable permit for off-site improvements

**Action Indicating Compliance with Mitigation Measure(s):** Approval of applicable permits for off-site improvements incorporating the provisions of this measure

## **P. CULTURAL RESOURCES**

### **P.(1) Paleontological Resources**

#### **Mitigation Measures for the Proposed Project and the Equivalency Program**

**P.(1)-1** Prior to issuance of grading/excavation permits, a qualified paleontologist shall be retained to develop an acceptable monitoring and treatment plan and to monitor construction activities at the Project site that might adversely impact potential paleontological resources in the Proposed Project area. The qualifications of the paleontologist and its designee shall be evaluated, and the development of the monitoring and treatment plan shall be made in consultation with the Vertebrate Paleontology Department of the Natural History Museum of Los Angeles County to ensure Project compliance with Society of Vertebrate Paleontology standard guidelines as appropriate.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of "B" or grading permit

**Action Indicating Compliance with Mitigation Measure(s):** Retention of a paleontologist; approval of monitoring and treatment plan; issuance of "B" or grading permits

- P.(1)-2** A monitoring and treatment plan for paleontological resources shall include the following measures:
- A qualified paleontologist or qualified designee shall monitor ground-disturbing activities at the Project site on a full-time basis along the lower part of the bluff where the Palos Verdes Sand would be disturbed. Monitoring shall consist of visually inspecting fresh exposures of rock for fossil remains large enough to be seen and, where appropriate, collecting and processing rock samples or excavated spoils to allow for the recovery of smaller fossil remains that are too small to be seen in the field.
  - If auguring or excavation is implemented in the alluvium of the Project site north of the bluff and extends to a depth below the water table, a qualified paleontologist or qualified designee shall monitor these activities on a full-time basis. Excavation or auguring in the alluvium at a depth above the water table shall be monitored on a half-time basis. Monitoring shall not be implemented until these activities have penetrated 5 feet of previously undisturbed strata under any artificial fill
  - If fossil remains large enough to be seen are uncovered by earth-moving activities, a qualified paleontologist or qualified designee shall divert these activities temporarily around the fossil site until the remains have been recovered, a rock sample has then been collected to process to allow for the recovery of smaller fossil remains, if warranted, and construction has been allowed to proceed through the site by a qualified paleontologist or qualified designee. If potentially significant resources are encountered, a letter of notification shall be provided in a timely manner to the Department of City Planning, in addition to the report (described below) that is filed at the completion of grading.
  - A qualified paleontologist or qualified designee shall collect all identifiable vertebrate fossil remains and samples of megainvertebrate fossil remains. All fossil sites shall be plotted on a topographic map of the Project site.
  - If a qualified paleontologist or qualified designee is not present when fossil remains are uncovered by earth-moving activities, these activities shall be stopped, and a qualified paleontologist or qualified designee shall be called to the site immediately to recover the remains.
  - At a qualified paleontologist or qualified designee's discretion and to reduce any construction delay, a construction worker shall assist in removing fossiliferous rock samples to an adjacent location for temporary stockpiling pending eventual transport to a laboratory facility for processing.
  - A qualified paleontologist or qualified designee shall conduct the processing (wet and/or dry screening and heavy-liquid flotation) of the rock samples to allow for the recovery of smaller fossil remains. Additional rock samples shall be collected



from a fossil site considered sufficiently productive to warrant processing. However, no more than 6,000 pounds each of rock from either the Palos Verdes Sand or the alluvium will be processed (12,000 pounds total).

- All fossil remains recovered in the field as a result of monitoring or by processing rock samples shall be prepared, identified, catalogued, curated, and accessioned into the fossil collections of the Natural History Museum of Los Angeles County or another museum repository complying with the Society of Vertebrate Paleontology standard guidelines. Accompanying specimen and site data, notes, maps, and photographs also shall be archived at the repository.
- Within 6 months following completion of the above tasks, a qualified paleontologist or qualified designee shall prepare a report summarizing the results of the mitigation program and presenting an inventory and describing the scientific significance of any fossil remains accessioned into the museum repository. Moreover, any site or geologic data indicating the possible presence and locations of additional fossil sites underlying the Project site will be discussed in the report so that future access to these sites will be maintained in the event of any future demolition, alteration, or removal of buildings built in connection with the Project. The report shall be submitted to the City of Los Angeles Planning Department and the museum repository. The report shall comply with the Society of Vertebrate Paleontology standard guidelines for assessing and mitigating impacts on paleontological resources.

**Enforcement Agency:** Los Angeles City, Department of City Planning, Department of Building and Safety

**Monitoring Agency:** Los Angeles City, Department of City Planning, Department of Building and Safety

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at monitoring and treatment plan approval; once at retention of a paleontologist; once at execution of grading or construction contract; once at submission of reports; once at issuance of Certificates of Occupancy

**Action Indicating Compliance with Mitigation Measure(s):** Approval of monitoring and treatment plan; retention of a paleontologist; execution of grading or construction contracts with mitigation measure provisions; once at submission of report; issuance of a temporary or permanent Certificates of Occupancy

## P.(2) Archaeological Resources

### Mitigation Measures for the Proposed Project and the Equivalency Program

**P.(2)-1** Prior to the issuance of any grading/excavation or building permits (except for grading/excavation permits associated with archaeological investigations) which may affect the properties designated as LAN-211/H and LAN-62, the measures required within the approved Archaeological Treatment Plans for these properties, which have been determined eligible for listing in the National Register of Historic Places and accepted by the U.S. Army Corps of Engineers, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation shall be implemented. The archaeological treatment plans shall be consistent with the following: the Secretary of Interior Guidelines for Archaeological Documentation; the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format, and Guidelines for Archaeological Research Designs; the Department of the Interior's Guidelines for Federal Agency Responsibilities under Sections 106 and 110 of the National Historic Preservation Act; and take into account the Council's publication, Treatment of Archaeological Properties – A Handbook.

**Enforcement Agency:** U.S. Army Corps of Engineers

**Monitoring Agency:** U.S. Army Corps of Engineers; Los Angeles City, Department of Public Works

**Monitoring Phase:** Pre-Construction

**Monitoring Frequency:** Once at issuance of grading/excavation or building permits

**Action Indicating Compliance with Mitigation Measure(s):** Statement of compliance from U.S. Army Corps of Engineers

**P.(2)-2** Prior to issuance of grading/excavation or building permits, a professional archaeologist shall be retained that meets the Secretary of Interior's guidelines and is listed in the Register of Professional Archaeologists to implement the Research Design and comply with the Programmatic Agreement.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once prior to construction

**Action Indicating Compliance with Mitigation Measure(s):** Retention of professional archaeologist; execution of construction contract

**P.(2)-3** Historic resources eligible for listing in the National Register of Historic Places shall be avoided or unavoidable disturbance be mitigated through data recovery, documentation, analysis, and curation. Archeological treatment plans required by the Programmatic Agreement shall be developed and implemented, as applicable. All materials and records resulting from implementation of the Programmatic Agreement shall be curated in accordance with 36 Code of Federal Regulations part 79.

- Enforcement Agency:** U.S. Army Corps of Engineers  
**Monitoring Agency:** U.S. Army Corps of Engineers  
**Monitoring Phase:** Pre-Construction; Construction  
**Monitoring Frequency:** Once at issuance of grading or building permits  
**Action Indicating Compliance with Mitigation Measure(s):** Implementation of archaeological treatment plans; issuance of grading or building permits; Statement of compliance from the U.S. Army Corps of Engineers
- P.(2)-4** In addition to a qualified archaeologist, a representative of the Gabrielino Indians shall be retained to monitor subsurface archaeological excavations. Prior to issuance of grading or building permits, evidence shall be provided for placement in the subject file with the City Planning Department that a Native American monitor has been retained.
- Enforcement Agency:** Los Angeles City, Department of City Planning  
**Monitoring Agency:** Los Angeles City, Department of City Planning  
**Monitoring Phase:** Pre-Construction; Construction  
**Monitoring Frequency:** Once prior to construction  
**Action Indicating Compliance with Mitigation Measure(s):** Retention of a Native American Gabrielino; execution of construction contract, during construction
- P.(2)-5** In the event that previously unknown archaeological and historical resources are discovered during construction, grading/excavation/construction shall temporarily be halted. The U.S. Army Corps of Engineers and the State Historic Preservation Office shall immediately be notified to provide these agencies with the opportunity to assess the resources and offer recommendations for treatment required by the Programmatic Agreement.
- Enforcement Agency:** U.S. Army Corps of Engineers  
**Monitoring Agency:** U.S. Army Corps of Engineers  
**Monitoring Phase:** Construction  
**Monitoring Frequency:** Annually until buildout  
**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contracts with mitigation measure provisions
- P.(2)-6** The Project archaeologist shall monitor ground disturbing activities in areas where significant archaeological or historical materials are discovered or detected. If cultural resources are discovered during grading/excavation/ construction monitoring, such resources shall be evaluated for their eligibility for listing in the National Register of Historic Places. If potentially significant resources are encountered, a letter of

notification shall be provided in a timely manner to the Department of City Planning, in addition to the report (described below) that is filed at the completion of grading. If eligible, an archaeological treatment plan shall be developed and implemented in accordance with the Programmatic Agreement.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Construction

**Monitoring Frequency:** As needed during construction operations

**Action Indicating Compliance with Mitigation Measure(s):** Execution of construction contracts with mitigation measure provisions

- P.(2)-7** Following completion of grading activities, a qualified archaeologist, who meets the Secretary of Interior Guidelines and is listed in the Register of Professional Archaeologists, shall prepare a report of the results of archaeological investigations to the City of Los Angeles Department of City Planning, other appropriate public agencies, and concurring parties as specified in the Programmatic Agreement. The report shall be submitted to the above parties according to the schedules established in the respective Archaeological Treatment Plans (ATPs).

**Enforcement Agency:** U.S. Army Corps of Engineers

**Monitoring Agency:** U.S. Army Corps of Engineers

**Monitoring Phase:** Construction

**Monitoring Frequency:** Once at completion of all grading

**Action Indicating Compliance with Mitigation Measure(s):** Submittal of archaeological investigation report

- P.(2)-8** If a commemorative display center for items of cultural significance should be provided in the Playa Vista First Phase Project, representative artifacts from the Proposed Project site, should they be discovered, or accurate replicas shall be made available for the display at the display center.

**Enforcement Agency:** Los Angeles City, Department of City Planning

**Monitoring Agency:** Los Angeles City, Department of City Planning

**Monitoring Phase:** Pre-Construction; Construction

**Monitoring Frequency:** Once at completion of archaeological investigation

**Action Indicating Compliance with Mitigation Measure(s):** Provision of artifacts/replicas to commemorative center; or curation at Fowler Museum at UCLA

**P.(3) Historical Resources**

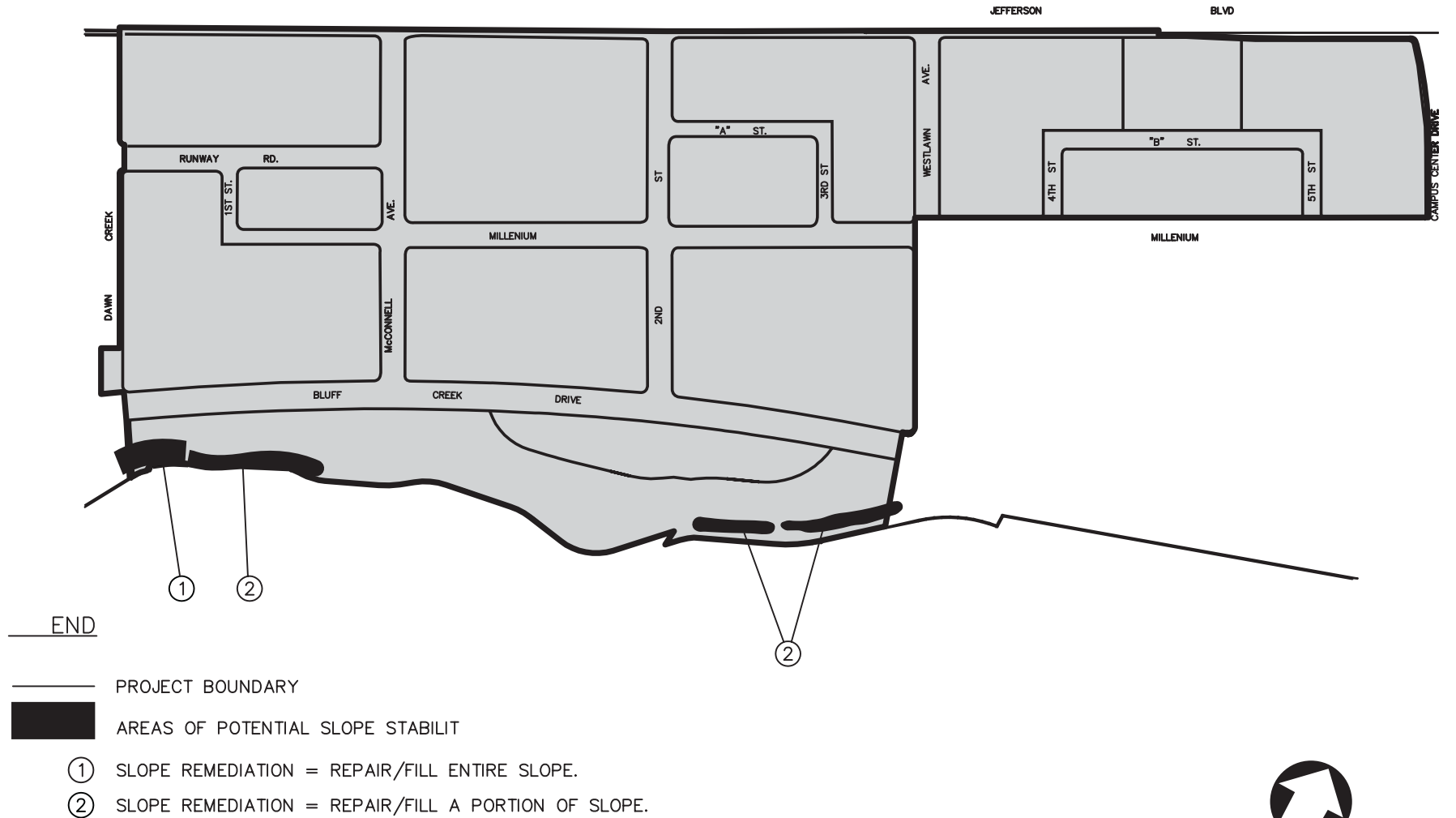
None proposed.

# 3.0 ATTACHMENTS

---

**ATTACHMENT A**  
**AREAS OF POTENTIAL SLOPE STABILITY PROBLEMS**

---



NOTE: BASE MAP AS SHOWN HEREON WAS PREPARED BY PSOMAS. SLOPE STABILITY INFORMATION SHOWN HEREON WAS DERIVED FROM GROUP DELTA CONSULTANTS SLOPE STABILITY INVESTIGATION OF 2001-2002.

MMRP Attachment A  
 Revised Draft EIR Figure 20,  
 Areas of Potential Slope Stability Problems  
 at the Proposed Project Site



---

**ATTACHMENT B  
BLUFF RESTORATION PLAN**

---

**PLAYA VISTA BLUFF RESTORATION  
PLANTING MATERIALS, PERFORMANCE STANDARDS, AND  
MAINTENANCE AND MONITORING PROGRAM**

**March 15, 2004**

**Prepared For:**

**Playa Capital Company, LLC  
5510 Lincoln Boulevard, Suite 100  
Los Angeles, California 90066**

**Prepared By:**

**Edith Read, Ph.D.  
6775 Centinela Avenue, Trailer A  
Culver City, CA 90230**

**and**

**John P. Rieger  
John Rieger & Associates  
3802 Rosecrans St. #373  
San Diego, CA 92110**

**PLAYA VISTA BLUFF RESTORATION  
PLANTING MATERIALS, PERFORMANCE STANDARDS, AND MAINTENANCE  
AND MONITORING PROGRAM**

**I. PLANTING MATERIALS**

Seed Mixes

Note: species and quantities will be subject to availability at time of application. If one or more species is unavailable, quantities of other species will be increased proportionately. If substitutions are necessary, they will be made only in consultation with a restoration specialist who is familiar with plant species native to coastal Los Angeles County.

**Hydroseed Mix #1**

<u>Species</u>	<u>Lbs/ac.</u>
<i>Artemisia californica</i>	4
<i>Baccharis pilularis</i>	2
<i>Camissonia cheiranthifolia</i> spp. suff.	2
<i>Lessingia filaginifolia</i>	1
<i>Croton californica</i>	0.5
<i>Datura wrightii</i>	0.25
<i>Encelia californica</i>	1
<i>Eriogonum gracile</i>	4
<i>Eriogonum fasciculatum</i> ssp. <i>fasciculatum</i>	3
<i>Eriogonum parvifolium</i>	4
<i>Eschscholzia californica</i>	2
<i>Gnaphalium bicolor</i>	0.25
<i>G. canescens</i> ssp. <i>microcephalum</i>	0.25
<i>Hazardia squarrosa</i>	0.25
<i>Ericameria ericoides</i>	0.25
<i>Isocoma menziesii</i>	0.25
<i>Heterotheca grandiflora</i>	0.05
<i>Isomeris arborea</i>	1.5
<i>Lasthenia californica</i>	3
<i>Lotus scoparius</i>	6
<i>Lotus strigosus</i>	4
<i>Lupinus bicolor</i>	3
<i>Lupinus longifolius</i>	1
<i>L. succulentus</i>	3
<i>Malacothamnus fasciculatus</i>	0.25
<i>Mirabilis californica</i>	0.5
<i>Castilleja exserta</i>	2
<i>Phacelia ramosissima</i>	0.5
<i>Salvia mellifera</i>	0.75
<i>Stipa (Nassella) pulchra / cernua</i>	1

## Hydroseed Mix #2

<i>Curcubita foetidissima</i>	50 seeds/ac
<i>Marah macrocarpus</i>	20 seeds/ac

## Container Plants

<i>Baccharis pilularis</i>	75 one-gallon size/ac
<i>Rhus integrifolia</i>	5 one-gallon size/ac
<i>Isomeria arborea</i>	10 one-gallon size/ac
<i>Salvia apiana</i>	10 one-gallon size/ac
<i>Prunus ilicifolia ssp. ilicifolia</i>	5 one-gallon size/ac
<i>Malosma laurina</i>	5 one-gallon size/ac
<i>Heteromeles arbutifolia</i>	10 one-gallon size/ac

## II. PERFORMANCE STANDARDS

The restored bluff areas will be considered successful if the following performance criteria are achieved at or before the end of the fifth growing season after planting:

At least 60 percent cover by native shrubs, forbs, and grasses.

At least 75 percent of the initially planted species diversity.

Signs of reproduction.

Less than 10 percent cover non-native weedy species.

Signs of usage by wildlife.

## III. MAINTENANCE & MONITORING

Three phases of monitoring are proposed: installation monitoring, horticultural monitoring and biological monitoring.

Installation monitoring will take place during the implementation phase to ensure that the project is being implemented as proposed. A report documenting the “as-built” conditions will be prepared.

Horticultural monitoring will take place in years 1 and 2 following project implementation. This monitoring will evaluate plant health and identify and correct problems. At least monthly visits will be made to assess the growth and vigor of the newly-planted vegetation, evaluate the effectiveness of weed control measures, and monitor bluff stability. As necessary, specific recommendations will be made to correct identified problems. An annual monitoring status report will be compiled. These will be incorporated in an annual report on project status. At the end of year 2, the need for continued horticultural monitoring will be reviewed and recommendations made. Annual horticultural monitoring reports shall be provided to the City of Los Angeles.

Biological monitoring will occur in years 3 and 5. The purpose of the biological monitoring is to measure the development of the habitat in comparison to performance standards, and to evaluate potential for long-term success as functioning habitat for wildlife. . Biological monitoring in year 3 will include information necessary to evaluate performance and assess environmental factors that might affect performance. Biological monitoring in year 3 will include information on slope, aspect, species composition, percent cover, presence/absence of seedlings, reproductive status (flowers, fruits), , percent bare ground, and percent litter. These data will be used to evaluate whether or not the habitat is exhibiting a positive trend toward achievement of the year 5 performance standards. Remedial actions will be recommended as appropriate. The data, analysis, and recommendations will be provided in a monitoring report submitted to the City of Los Angeles no later than December 31 of year 3. Biological monitoring in year 5 will include all of the parameters measured in year 3, as well as a spring survey for avian species that are utilizing the habitat for foraging and/or nesting. The avian data will be used in a qualitative analysis to assess habitat function and long-term values as wildlife habitat. A report will be provided to the City of Los Angeles no later than December 31 of year 5. This final monitoring report will include the data, analysis of vegetation in comparison to performance standards, and an evaluation of the potential long-terms values of the site as wildlife habitat.

---

**ATTACHMENT C**  
**PROPOSED PROJECT DEVELOPMENT STANDARDS**

---

---

**The following is Subsection 3.3 Project Design Feature of Section IV.G, Land Use, of the Village at Playa Vista Draft EIR as revised for the Final EIR.**

### **3.3 Project Design Features**

#### **3.3.1 Urban Development Component**

The Proposed Project's Urban Development Component would create a planned, mixed-use community, containing a diverse range of commercial, residential, recreational, public and open space uses. The Project design includes a specified land use arrangement of streets, blocks, and lots, as well as development standards which limit the amount and type of development which can occur. The Proposed Project would be implemented via amendments to the Westchester-Playa del Rey Community Plan and the Playa Vista Area D Specific Plan. The proposed land use arrangement and plan designations are presented in the Revised Draft EIR Figure 51 which is included below within this attachment (Attachment C, Exhibit 1).

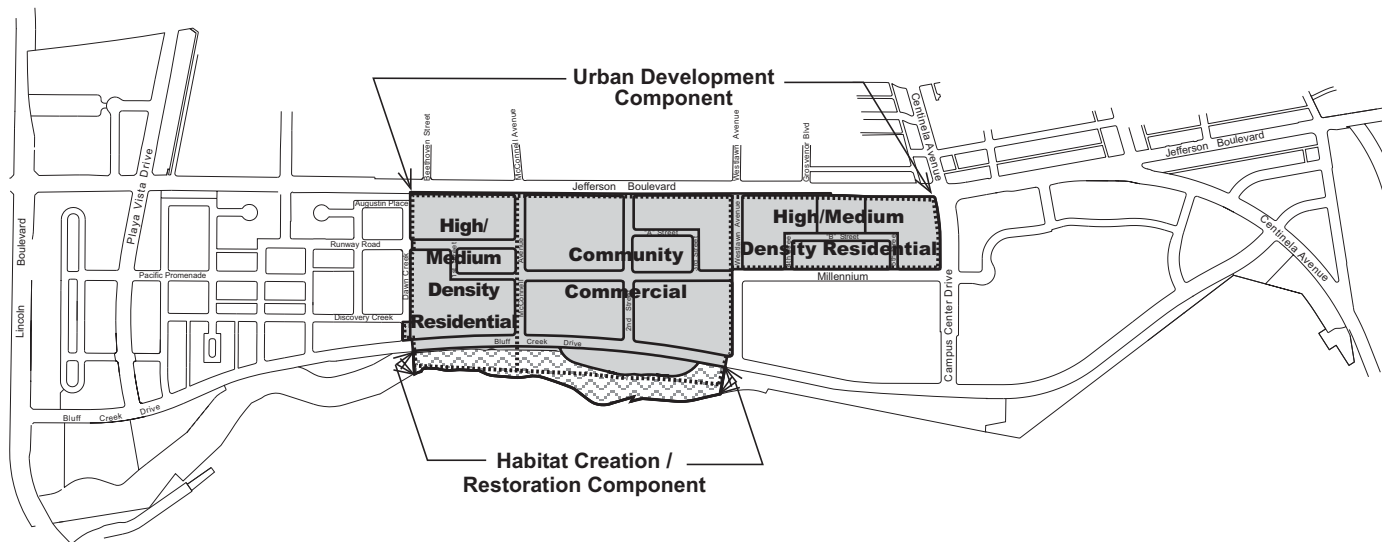
The Urban Development Component includes a series of residential neighborhoods organized around a Village Center. The Village Center is envisioned as an area defined by mixed-use development centered on a public plaza that may include ground floor retail uses with additional retail, office and/or residential uses located above. The development program for the Proposed Project is presented in Table 86 of the Draft EIR and shown in Table 1.

The shapes and locations of the building envelopes in which development could occur would be limited by restrictions on building heights, on developable floor area as a percentage of lot area, and minimum setbacks. The proposed height limit designations for the site are shown in the Revised Draft EIR Figure 52, which is included below within this Attachment (Attachment C, Exhibit 2). The height limits are expressed in feet AMSL. By expressing the height limits in terms of elevation rather than height above ground, direct comparisons can be made to the elevations associated with the various visual vantage points outside of the Project site, such as the Westchester Bluffs. For descriptive purposes, building heights, as expressed in feet above mean sea level, are correlated to building heights above ground level in the legend for Exhibit 2.

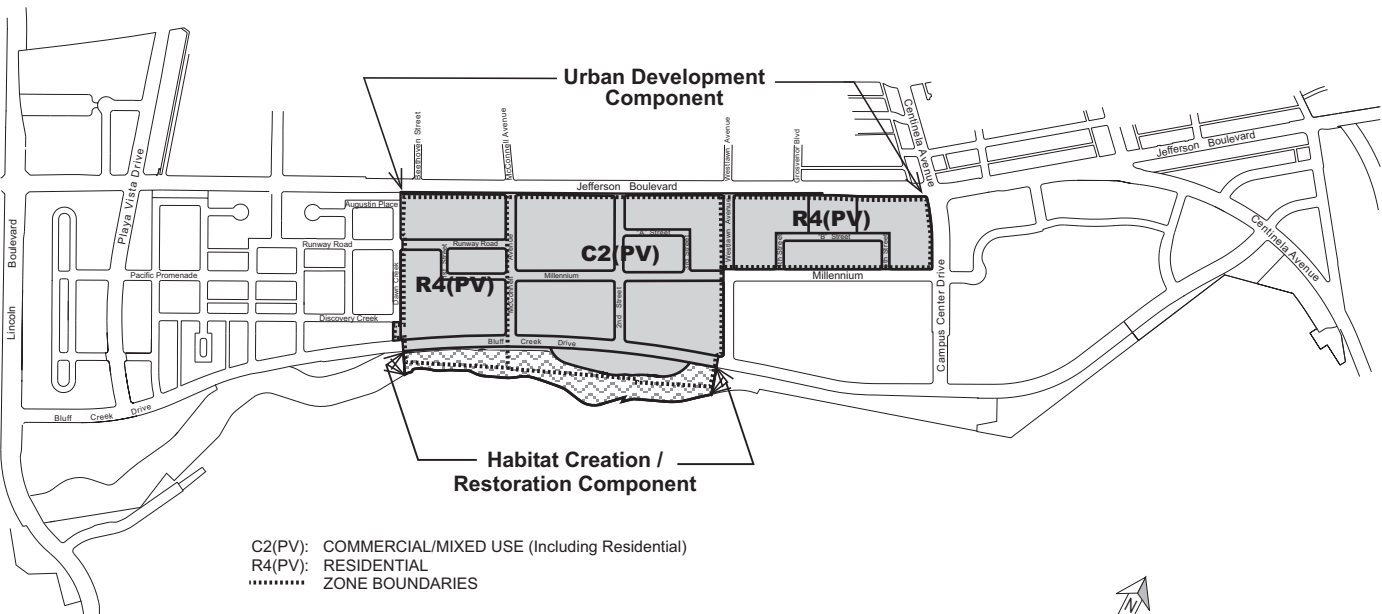
The Proposed Project further restricts the mass of development by placing limits on the percentage of total lot area which may be developed through the Project's Development Criteria and Guidelines. The limitations on floor area varies according to land uses, as follows:

- Residential Lots: The maximum lot coverage would be 55 percent
- Commercial and Mixed Use Lots: The maximum lot coverage would be 70 percent

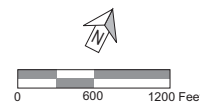
## Proposed General Plan Designations



## Proposed Specific Plan/Zoning Designations



**NOTE:**  
 Locations of roadways and land use boundaries are approximate.  
 Precise placement will be determined as part of subdivision process.



**MMRP Attachment C-Exhibit 1  
 Revised Draft EIR Figure 51,  
 Proposed Plan Designations**

Source: Playa Capital Company, March 2004



Table 1

## Draft EIR Table 86 - PROPOSED PROJECT DEVELOPMENT COMPONENTS

<u>Land Areas</u>	<u>Size (acres)</u>	<u>Totals</u>
<b>Urban Development Component</b>		
Urban Development	87.5 <sup>a</sup>	
Parks	11.4 <sup>b</sup>	
Passive Open Space	0.4 <sup>c</sup>	
<b>Subtotal</b>		99.3
<b>Habitat Creation/Restoration Component</b>		
Riparian Corridor	6.7	
Bluffs	5.0	
<b>Subtotal</b>		<u>11.7</u>
<b>Total Area</b>		111.0
<b>Urban Development Program<sup>d</sup></b>		
<u>Land Uses</u>	<u>Size</u>	
Office	175,000 sq.ft.	
Residential Units	2,600 du	
Retail	150,000 sq.ft.	
Community-Serving	40,000 sq.ft.	

<sup>a</sup> Includes 1.0 acres of bicycle lanes

<sup>b</sup> Park acreage is approximate. Actual park acreage will be provided in accordance with the Project's adopted conditions of approval, based on the number of dwelling units ultimately constructed.

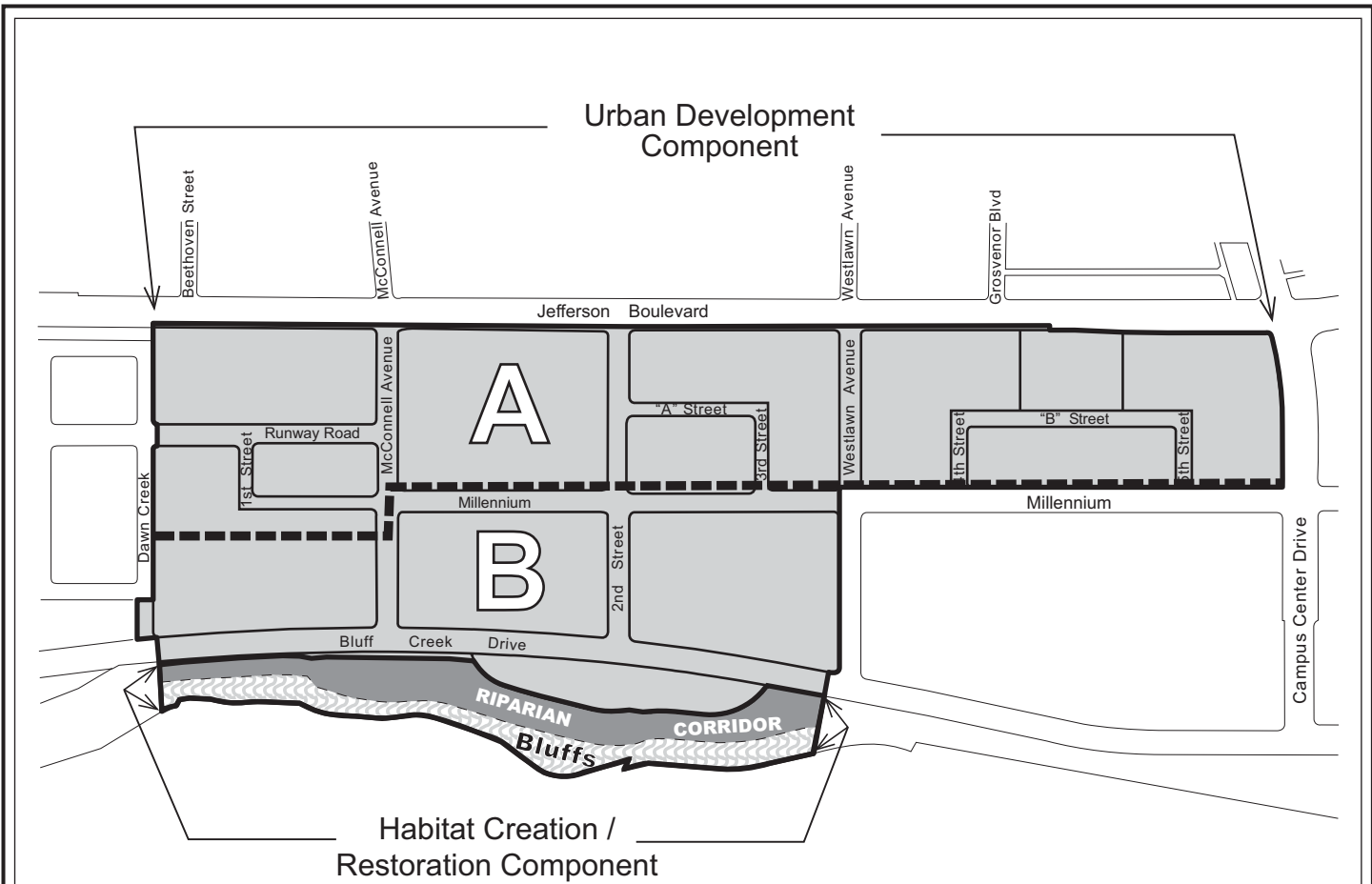
<sup>c</sup> Located along the south side of Bluff Creek Drive, just to the north of the Proposed Project's Habitat Creation/Restoration Component.

<sup>d</sup> The Proposed Project would also include an Equivalency Program to allow a limited exchange of office uses for additional retail uses and/or assisted living uses.

Source: Playa Capital Company, 2003.

- Park Sites: The maximum lot coverage would be 15 percent (for recreational and park structures).



The design and development criteria set forth in the tract condition would establish further regulations pertaining to the portions of individual developments sites within which development can occur. This is accomplished by establishing minimum front, side and rear lot setback areas. The proposed setback requirements are presented in Table 87 of the Draft EIR and shown in Table 2.


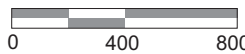


**LEGEND**

Height District	Above Mean Sea Level (AMSL)	Above Finished Grade <sup>a</sup>	Above Existing Grade <sup>a</sup>
<b>A</b>	95'	68' - 72'	71' - 88'
<b>B</b>	112'	85'-89'	88'-105'

<sup>a</sup> Height above finished grade and above existing grade are approximate. Finished grades will be approximately 23' to 27' AMSL. Existing grades vary from approximately 7' to 24' AMSL. Westchester Bluffs: Approximately 140' AMSL

 Urban Development Component  
 Habitat Creation / Restoration Component



**MMRP Attachment C-Exhibit 2  
Revised Draft EIR Figure 52,  
Proposed Height Limits**

Source: PCR Services Corporation, March 2004

Table 2

## Draft EIR Table 87 - PROPOSED SETBACK REQUIREMENTS

Location	Required Setback
<u>Thoroughfares</u>	
Jefferson Boulevard	15 Feet (From the right-of-way/property line, regardless of which way the building orients on the lot. This setback excludes retaining walls.)
Bluff Creek Drive	15 Feet
Runway Road (Dawn Creek to McConnell)	15 Feet Residential Development will characterize this block
Millennium Road (Between 1st Street and McConnell Avenue)	10 Feet
Millennium Road (McConnell to 2nd Street)	0-5 Feet (Street front retail/live-work residential will characterize this block.)
Millennium Road (Between 2nd Street and Campus Center Drive)	15 Feet
McConnell Avenue	10 Feet
McConnell Avenue (400 feet north of Millennium Road along the east side of the block)	0-5 Feet (Street front retail will characterize this block.)
Westlawn Avenue	10 Feet
Campus Center Drive	15 Feet
1st, 2nd, 3rd, 4 <sup>th</sup> , and 5th Street	10 Feet
2nd Street (400 feet north of Millennium Road along the west side of the block)	0-5 Feet (Street front retail will characterize this block.)
A and B Streets	10 Feet
Dawn Creek	10 Feet
<u>Setbacks from Adjacent Lots</u> <sup>a</sup>	
Adjacent to a Residential or Commercial Lot	10 Feet
Adjacent to a Park or Open Space Lot	5 Feet

<sup>a</sup> Multi-family structures in two separately developed Projects shall be separated by no less than 20 feet.

Source: Playa Capital Company, 2004.

### 3.3.2 Habitat Creation/Restoration Component

The Project's Habitat Creation/Restoration Component includes the construction of a 6.7-acre Riparian Corridor and the restoration and maintenance of a five-acre portion of the Westchester Bluffs, located to the south of the Riparian Corridor.

The proposed Riparian Corridor would include habitat such as emergent, willow scrub woodlands and mixed riparian woodlands, as well as native grasslands. The construction of this Project component would complete a 25-acre riparian corridor that also includes sections east and west of the proposed Riparian Corridor, ultimately feeding into the Playa Vista First Phase

Freshwater Marsh (west of Lincoln Boulevard and south of Jefferson Boulevard), thus establishing a 51-acre Freshwater Wetland System. The proposed bluff restoration program would enhance the bluffs as a coastal sage scrub community with increased habitat value.

---

**ATTACHMENT D  
VILLAGE AT PLAYA VISTA  
BUILDING METHANE MITIGATION GUIDELINES AND  
CITY OF LOS ANGELES ORDINANCE NO. 175790,  
METHANE SEEPAGE REGULATIONS**

---

# Village at Playa Vista Building Methane Mitigation Guidelines, August 12, 2003.

## VILLAGE AT PLAYA VISTA BUILDING METHANE MITIGATION GUIDELINES

### I. PURPOSE.

These guidelines set forth the minimum requirements for the control of methane intrusion emanating from geologic formations. The guidelines do not regulate flammable vapor that may originate in and propagate from other sources which include, but are not limited to, ruptured hazardous material transmission lines, underground atmospheric tanks, or similar installations.

### II. DEFINITIONS.

For purposes of these guidelines, certain words and phrases are defined as follows:

**ALARM SYSTEM** is a system consisting of components and circuits arranged to monitor and annunciate the status of gas alarm or supervisory signal-initiating devices and to initiate the appropriate response to those signals.

**CABLE SEAL FITTING** is an approved fitting provided in a cable system to prevent the passage of gases, vapors, or flames through electrical cable.

**CONDUIT SEAL FITTING** is an approved fitting provided in a conduit system to prevent the passage of gases, vapors, or flames through electrical conduit.

**DESIGN METHANE CONCENTRATION** is the highest concentration of methane gas found during site testing.

**DESIGN METHANE PRESSURE** is the highest pressure of methane gas found during site testing.

**DE-WATERING SYSTEM** is a permanent water removal system, consisting of perforated pipes, gravel, sump pumps and pits, designed to permanently maintain the ground water level one foot below the sub-slab vent system.

**GAS DETECTION SYSTEM** is one or more electrical devices that measure the methane gas concentration and communicate the information to the occupants or building management with audible or visual signals.

**GRAVEL BLANKET** is a layer of gravel, sand, or approved material designed to transmit gas to the vent riser without obstructing the venting system.

**HISTORIC HIGH GROUND WATER TABLE ELEVATION** is the highest recorded elevation of ground water table based on historic records and field investigations as determined by the engineer

for the methane mitigation system.

**IMPERVIOUS MEMBRANE** is a continuous gas barrier made of material approved by the department and installed beneath a building for the purpose of impeding methane migration to the interior of the building.

**MECHANICAL EXTRACTION SYSTEM** is a mechanical system designed for removal of methane gas from below the impervious membrane through the use of fans, blowers, or other powered devices.

**MECHANICAL VENTILATION** is a fan, blower or other similar mechanical system within the building which introduce and/or remove air from an enclosed space.

**OIL WELL** is any well drilled for the exploration of oil or gas; any well on lands producing or reasonably presumed to contain commercially viable quantities of oil or gas; any well drilled for the purpose of injecting fluids or gas for stimulating oil recovery, re-pressurizing or pressure maintenance of oil or gas, or disposing of waste fluids from an oil or gas field.

**PERFORATED HORIZONTAL PIPE** is a perforated pipe placed horizontally beneath the foundation of a building for the purpose of venting any accumulated methane gas and preventing the development of elevated gas pressures.

**PPMV** is an abbreviation for Parts per Million by Volume.

**PRESSURE SENSOR** is a device that measures and communicates surrounding gas pressure to an alarm or control system.

**SINGLE STATION GAS DETECTOR** is a device consisting of electrical components capable of measuring methane gas concentration and transmitting methane concentration data to a control panel or other components of alarm systems.

**TRENCH DAM** is an approved subsurface barrier installed within a trench adjacent to the foundation of a building, for the purpose of preventing the migration of methane gas beneath that foundation.

**UNENCLOSED BUILDING** is a building having exterior walls of the lowest level with unobstructed openings equal to at least 25 percent of the total perimeter wall area and evenly distributed and located within the upper portion of at least two opposite sides.

**UNOBSTRUCTED OPENING** is a permanent opening in the walls, floors or roof-ceiling assemblies without windows, doors, skylights or other solid barriers that may restrict the flow of air.

**VENT RISER** is a solid vertical vent piping with joints and fittings connected to Perforated Horizontal Pipes to safely convey and discharge the gas to the atmosphere.



**VILLAGE AT PLAYA VISTA** is the area bounded by the Playa Vista First Phase Project to the east and the west, Jefferson Boulevard to the north and the Westchester Bluffs to the south and is more particularly described in the Village at Playa Vista Environmental Impact Report.

### **III. GENERAL METHANE MITIGATION REQUIREMENTS**

All new buildings located in the Village at Playa Vista shall comply with these guidelines and any standards or rules of general application officially adopted by the Department of Building and Safety or may as otherwise be applicable to the Village at Playa Vista.

**A. Methane Mitigation Requirements.** All buildings shall provide a Methane Mitigation System, as required by Table XX, except as provided below. The Methane Mitigation System requirements of Table XX are based upon the level of the Site Design Level. The Site Design Level is determined by the Design Methane Concentration and the Design Methane Pressure as determined by site testing.

The site testing shall be conducted under the supervision of a registered Civil Engineer, Soil Engineer or Geologist to locate and measure methane gas in subsurface geological formations. The registered Civil Engineer, Soil Engineer or Geologist, shall indicate in a report to the Department, the testing procedure and testing instruments used to determine the Design Methane Concentration and the Design Methane Pressure and an effective location for the deep vent wells, if required. The report shall be submitted with the plans for construction of the building and shall be signed and stamped by the responsible person.

**B. Exceptions to Table XX.** The provisions of this section are exceptions to the construction requirements of Table XX.

**1. Narrow Buildings.** When Pressure Sensors below Impervious Membrane are not required per Table XX, Pressure Sensors below Impervious Membrane may be installed in lieu of Gas Detection System and Mechanical Ventilation for Narrow Buildings. Narrow Building are buildings of width less than 50 feet, footprint of less than 50,000 square feet and having a minimum 2-foot wide landscaped area immediately adjacent to the exterior wall for at least 50 percent of the perimeter of the building.

**2. Buildings with Raised Floor Construction.** A building with raised floor construction shall have adequate under-floor ventilation by providing the following:

- a. An approved mechanical ventilation system; or
- b. An under-floor system with a clear height above grade of at least 12 inches to girder and 18 inches to floor joist; and
- c. Openings for under-floor area or crawl space ventilation shall be located less than 6 inches below the bottom of the floor joists. The openings shall be located to provide cross

ventilation and shall be the larger of:

1. Openings of not less than 1.5 square feet for each 25 linear feet of exterior wall; or
  2. Openings shall be 1% of under-floor area.
- d. The required area of such openings shall be approximately equally distributed along the length of at least two opposite sides of the building. They shall be covered with corrosion-resistant wire mesh with mesh openings of greater than ¼ inch and less than ½ inch in dimension.

A building with raised floor construction shall be constructed with the following mitigation components, in lieu of the requirements of Table XX:

- a. The utilities shall be installed with Trench Dams and either Conduit Seal Fittings or Cable Seals Fittings.
- b. Four inch thick gravel blanket is installed under and around the elevator pits.

**3. Buildings with Natural Ventilation.** Buildings with Natural Ventilation, such as, bathrooms, gazebos, barns, attendant stations, and other similar accessory buildings located in parks or buildings with lowest levels closest to grade having Group S, Division 2, 3 or 4 occupancy, or detached buildings of Group U, Division 1 occupancy, and Unenclosed Buildings shall be constructed with utilities installed with Trench Dams and either Conduit Seal Fittings or Cable Seals Fittings, in lieu of the requirements of Table XX.

Buildings with Natural Ventilation are buildings with Unobstructed Openings in exterior walls. The total area of the Unobstructed Openings in the exterior wall shall be at least 25 percent of the floor area and shall be evenly spaced to prevent the accumulation of methane gases.

**4. Single Family Dwelling.** Single Family Dwelling and buildings accessory to single family dwelling shall comply with all the Methane Mitigation requirements of Table XX, except the following may be substituted:

- a. Pressure Sensors below Impervious Membrane may be installed in lieu of Gas Detection System when Pressure Sensors below Impervious Membrane is not required, or
- b. Single Station Gas Detectors with battery back-up may be installed in lieu of Alarm System and Gas Detection System, or
- c. 6 mil thick Visquene may be used in lieu of Impervious Membrane, with Site Design Levels I or II, or
- d. Deep Vent Well or Mechanical Ventilation may be omitted for buildings with width less than 50 feet or footprints less than 6,000 square feet in area, or
- e. Vent Risers maybe provided in lieu of Mechanical Extraction System.

#### **IV. EXISTING BUILDINGS.**

Additions, alterations, repairs, change of use or change of occupancy to existing buildings shall comply with the methane mitigation requirements of these guidelines using the thresholds of Chapter 34 or Chapter 81 of the Building Code.

Approved gas detection and mechanical ventilation systems in existing buildings shall be tested, maintained and serviced in accordance with Section V.

#### **V. TESTING, MAINTENANCE AND SERVICE OF GAS-DETECTION AND MECHANICAL VENTILATION SYSTEMS.**

All gas detection and mechanical ventilation systems shall be maintained and serviced in proper working condition and meet all requirements of the Electrical and Mechanical Code. The testing, maintenance and service procedure for gas detection and mechanical ventilation systems shall be performed in accordance with the manufacturer's current written instructions and the following:

1. **Fire Department.** The manufacturer's instructions shall be approved and filed with the Fire Department. Testing and servicing of each system shall be performed by a person approved by the Fire Department.
2. **Notification Placard.** A permanent notification placard shall be posted and maintained at the front entrance of the building except in residential buildings. The placard shall indicate the presence of the methane Impervious Membrane barrier and ventilation system. The location of the placard, size and specification of the placard shall be approved by the Fire Department.

#### **VI. EMERGENCY PROCEDURES.**

Emergency procedures shall be established for all buildings with gas-detection systems, except buildings of Group R, Division 3 or U Occupancies. The procedures shall include the following:

1. Assignment of a responsible person to work with the Fire Department in the establishment, implementation and maintenance of an emergency plan.
2. Conspicuous posting of the Fire Department's telephone number in areas designated by the Fire Department.
3. Conspicuous posting of emergency plan procedures approved by the Fire Department.

## **VII. ADDITIONAL REMEDIAL MEASURES.**

**A. General Remedial Measures.** 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 a qualified engineer to investigate, recommend and implement additional mitigating measures. Such measures shall be subject to approval by the Building and Safety Department and Fire Department.

**B. Abandoned Oil Well.** Any abandoned oil well encountered during construction shall be evaluated by the Fire Department and may be required to be re-abandoned in accordance with applicable rules and regulations of the Division of Oil and Gas of the State of California. Buildings shall comply with these provisions and the requirements of Section 6105 of the Building Code, whichever is more restrictive.

C:\ATEM\Phase Two EIR C114 Regulation 08-06-03 EIR text 2bb.wpd

**Table XX — MITIGATION REQUIREMENTS FOR VILLAGE AT PLAYA VISTA**

Site Design Level		LEVEL I		LEVEL II		LEVEL III		LEVEL IV		LEVEL V
Design Methane Concentration (ppmv)		0-100		101-1,000		1,001-5,000		5,001-12,500		>12,500
Design Soil Gas Pressure (inches of water pressure)		≤2"	>2"	≤2"	>2"	≤2"	>2"	≤2"	>2"	All Pressures
De-watering System <sup>1</sup>		X	X	X	X	X	X	X	X	X
Sub-Slab Vent System	Perforated Horizontal Pipes	X	X	X	X	X	X	X	X	X
	Gravel Blanket Thickness Under Impervious Membrane	2"	2"	2"	3"	2"	3"	2"	4"	4"
	Gravel Thickness Surrounding Perforated Horizontal Pipes	2"	2"	2"	3"	2"	3"	2"	4"	4"
	Vent Risers	X	X	X	X	X	X	X	X	X
Impervious Membrane		X	X	X	X	X	X	X	X	X
Sub-Slab Vent System	Pressure Sensors Below Impervious Membrane								X	X
	Mechanical Extraction System								X	X
Lowest Occupied Space System	Gas Detection System <sup>2</sup>		X		X	X	X	X	X	X
	Mechanical Ventilation <sup>2,3</sup>		X		X	X	X	X	X	X
	Alarm System		X		X	X	X	X	X	X
Control Panel			X		X	X	X	X	X	X
Trench Dam		X	X	X	X	X	X	X	X	X
Conduit or Cable Seal Fitting		X	X	X	X	X	X	X	X	X
Deep Vent Well <sup>4</sup>										X

= Indicates a Required Mitigation Component

De-watering not required when the maximum Historical High Ground Water Table Elevation, or projected post-construction ground water level, is more than 12 inches below the bottom of the Perforated Horizontal Pipes.

See exception for Narrow Buildings.

Natural ventilation, may be used in lieu of mechanical ventilation.

Deep Vent Well is not required when Vent Risers are installed at twice the design Vent Riser requirements.

City of Los Angeles Ordinance No. 175790, Methane  
Seepage Regulations, Adopted February 2, 2004

ORDINANCE NO. 175790

An ordinance amending Section 91.106.4.1 and Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code to establish citywide methane mitigation requirements and include more current construction standards to control methane intrusion into buildings.

**WHEREAS**, there was a fire in the Fairfax Area of the City of Los Angeles in 1985, due to high volume of methane gas seepage through cracks in the concrete floor of a building;

**WHEREAS**, the City of Los Angeles adopted an Ordinance, (Ord. No. 161,552, Eff. 8-31-86) which required mitigation for methane gas intrusion into buildings located in the Fairfax area of Los Angeles;

**WHEREAS**, methane gas which percolates from subsurface geological formations to the atmosphere is a natural phenomenon;

**WHEREAS**, in 1999, large pockets of methane gas in subsurface geological formations were discovered at the Playa Vista project area of West Los Angeles;

**WHEREAS**, in 2001, new methane mitigating systems were developed and used in the Playa Vista Project;

**WHEREAS**, in Council File No. 01-1305, the City Council directed the City's Departments of Building and Safety, Engineering, and Planning, as well as, the Chief Legislative Analyst and Office of Administrative and Research Services, to form a work group and recommend uniform safety requirements regarding methane, for all future development throughout the City;

**WHEREAS**, a study by the work group was conducted regarding areas throughout the City of Los Angeles to identify areas where subsurface methane gas may be found;

**WHEREAS**, from the information and data provided by the Division of Oil, Gas and Geothermal Resources, Department of Conservation, State of California, City of Los Angeles Department of Environmental Affairs, Department of Building and Safety and the Fire Department a map was plotted by the Department of Public Works to show other areas within the City of Los Angeles, where there exists a possible potential hazard of methane gas;

**WHEREAS**, modern construction standards were successfully used as methane mitigation systems for many projects in Playa Vista;

**WHEREAS**, the work group utilized the research and knowledge gained through the development of the Playa Vista methane mitigation systems;

**WHEREAS**, many of the modern construction standards to mitigate potential hazard of methane gas intrusion into building were incorporated into the Los Angeles Municipal Code as more restrictive provisions than found in the 2001 edition of the California Building Code based on local geological conditions;

**NOW, THEREFORE,**

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

Section 1. Exception 6 of Section 91.106.4.1 of the Los Angeles Municipal Code is amended to read:

6. The Department shall have the authority to withhold permits on projects located within a Methane Zone or Methane Buffer Zone established under Sections 91.7101 *et seq.* of this Code. Permits may be issued upon submittal of detailed plans that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation systems.

Sec. 2. Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code is amended to read:

**DIVISION 71  
METHANE SEEPAGE REGULATIONS**

**SEC. 91.7101. PURPOSE.**

This division sets forth the minimum requirements of the City of Los Angeles for control of methane intrusion emanating from geologic formations. The requirements do not regulate flammable vapor that may originate in and propagate from other sources, which include, but are not limited to, ruptured hazardous material transmission lines, underground atmospheric tanks, or similar installations.



## SEC. 91.7102. DEFINITIONS.

For the purpose of this division, certain words and phrases are defined as follows:

**Alarm System** shall mean a group of interacting elements consisting of components and circuits arranged to monitor and annunciate the status of gas concentration levels or supervisory signal-initiating devices and to initiate the appropriate response to those signals.

**Buildings with Raised Floor Construction** shall mean a building with the bottom of the floor system raised above grade where the clearance for each of the following items shall be at least: 12 inches for the girder, 18 inches for the floor joist and 24 inches for the structural floors.

**Cable or Conduit Seal Fitting** shall mean an approved fitting provided in a cable or conduit system to prevent the passage of gases, vapors, or flames through electrical cable or conduit.

**Design Methane Concentration** shall mean the highest concentration of methane gas found during site testing.

**Design Methane Pressure** shall mean the highest pressure of methane gas found during site testing.

**De-watering System** shall mean a permanent water removal system, consisting of perforated pipes, gravel, sump pumps and pits, designed to permanently maintain the ground water level one foot below the sub-slab vent system.

**Gas Detection System** shall mean one or more electrical devices that measure the methane gas concentration and communicate the information to the occupants, building management, central station or alarm company with audible or visual signals.

**Gravel Blanket** shall mean a layer of gravel, sand, or approved material designed to transmit gas to the vent riser without obstructing the venting system.

**Impervious Membrane** shall mean a continuous gas barrier made of material approved by the Department and installed beneath a building for the purpose of impeding methane migration to the interior of the building.

**Mechanical Extraction System** shall mean a system operated by a machine which is designed to remove methane gas from below the impervious membrane through the use of fans, blowers, or other powered devices.

**Mechanical Ventilation** shall mean a fan, blower or other similar group of interacting elements operated by a machine within the building, which introduce and/or remove air from an enclosed space.

**Narrow Building** shall mean a building that has a width less than 50 feet, a footprint of less than 50,000 square feet and having a minimum 2-foot wide landscaped area immediately adjacent to the exterior wall for at least 50 percent of the perimeter of the building.

**Oil Well** shall mean a deep hole or shaft sunk into the earth for the exploration of oil or gas; or which is on lands producing or reasonably presumed to contain oil or gas; or which is drilled for the purpose of injecting fluids or gas for stimulating oil recovery, re-pressurizing or pressure maintenance of oil or gas, or disposing of waste fluids from an oil or gas field.

**Perforated Horizontal Pipe** shall mean an approved pipe which contains a series of small holes or narrow openings placed equidistant along the length of the approved pipe, which is placed horizontally beneath the foundation of a building, for the purpose of venting accumulated methane gas and preventing the development of elevated gas pressures, or for drainage of ground water to an approved location.

**PPMV** shall mean Parts per Million by Volume.

**Pressure Sensor** shall mean a device that measures and communicates surrounding gas pressure to an alarm or control system.

**Single Station Gas Detector** shall mean a device consisting of electrical components capable of measuring methane gas concentration and initiating an alarm.

**Trench Dam** shall mean an approved subsurface barrier installed within a furrow or ditch adjacent to the foundation of a building, for the purpose of preventing the migration of methane gas beneath that foundation.

**Unobstructed Opening** shall mean a permanent clearing or gap in the walls, floors or roof-ceiling assemblies without windows, doors, skylights or other solid barriers that may restrict the flow of air.

**Vent Riser** shall mean an approved pipe which is placed vertically with joints and fittings connected to Perforated Horizontal Pipes to convey and discharge the gas to the atmosphere.

**SEC. 91.7103. GENERAL METHANE MITIGATION REQUIREMENTS.**

All new buildings and paved areas located in a Methane Zone or Methane Buffer Zone shall comply with these requirements and the Methane Mitigation Standards established by the Superintendent of Building. The Methane Mitigation Standards provide information describing the installation procedures, design parameters and test protocols for the methane gas mitigation system, which are not set forth in the provisions of this division.

Boundaries of the Methane Zones and Methane Buffer Zones are shown on the "Methane and Methane Buffer Zones Map" designated as Map number A-20960, dated September 21, 2003, which is attached to Council File No. 01-1305.

**SEC. 91.7104. GENERAL METHANE REQUIREMENTS.**

**91.7104.1. Site Testing.** Site testing of subsurface geological formations shall be conducted in accordance with the Methane Mitigation Standards. The site testing shall be conducted under the supervision of a licensed Architect or registered Engineer or Geologist and shall be performed by a testing agency approved by the Department.

The licensed Architect, registered Engineer or Geologist shall indicate in a report to the Department, the testing procedure, the testing instruments used to measure the concentration and pressure of the methane gas. The measurements of the concentration and pressure of the methane gas shall be used to determine the Design Methane Concentration and the Design Methane Pressure. The Design Methane Concentration and the Design Methane Pressure shall determine the Site Design Level of Table 71.

**EXCEPTION:** Site testing is not required for buildings designed to the requirements of Site Design Level V as described in Table 71, or for buildings designed using the exceptions set forth in Sections 91.7104.3.2 or 91.7104.3.3.

**91.7104.2. Methane Mitigation Systems.** All buildings located in the Methane Zone and Methane Buffer Zone shall provide a methane mitigation system as required by Table 71 based on the appropriate Site Design Level. The Superintendent of Building may approve an equivalent methane mitigation system designed by an Architect, Engineer or Geologist.

Table 71 prescribes the minimum methane mitigation systems, such as, the passive; active and miscellaneous systems, depending on the concentration and pressure of the methane present at the site. Each component of the passive, active and miscellaneous systems shall be constructed of an approved material and shall be installed in accordance with the Methane Mitigation Standards.

**91.7104.2.1. Passive System.** The passive system is a methane mitigation system installed beneath or near the building. The components of the passive system may consist of a de-watering system, the sub-slab vent system, and impervious membrane. The sub-slab vent system shall consist of Perforated Horizontal Pipes, Vent Risers, and Gravel Blankets for the purpose of collecting and conveying methane from the soil underneath the building to the atmosphere.

**91.7104.2.1.1. De-watering System.** The de-watering system is used to lower the ground water table to a level more than 12 inches below the bottom of the Perforated Horizontal Pipes. The de-watering system shall conduct ground water to an approved location.

**91.7104.2.2. Active System.** The components of the active system shall consist of one or more of the following, sub-slab system, gas detection system, mechanical ventilation, alarm system and control panel. All components shall be constructed of an approved material, installed in accordance with the Methane Mitigation Standards.

**91.7104.2.3. Miscellaneous System.** The components of the miscellaneous system may consist of Trench Dam, Cable or Conduit Seal Fitting, or Additional Vent Risers. The component of the miscellaneous system shall be a material approved by the Department and shall be installed in accordance with the Methane Mitigation Standards.

**91.7104.3. Exceptions to Table 71.** The provisions of this section are exceptions to the construction requirements of Table 71.

**91.7104.3.1. Narrow Buildings.** Narrow Buildings may substitute Pressure Sensors below the Impervious Membrane in lieu of the Gas Detection System and Mechanical Ventilation, if the installation of the Pressure Sensors below the Impervious Membrane is not required per Table 71 and the Narrow Building is constructed with a minimum two feet wide landscaped area covering at least 50 percent of the ground immediately adjacent to the exterior building walls.

**91.7104.3.2. Buildings with Raised Floor Construction.** If a Building with Raised Floor Construction has underfloor ventilation construction in accordance with the standards below, then the utilities shall be installed with Trench Dams and Cable or Conduit Seal Fittings and a four inch thick gravel blanket shall be installed under and

around the elevator pits.

Underfloor ventilation shall be provided by an approved mechanical ventilation system capable of exhausting underfloor air an equivalent of every 20 minutes, or by openings in the underfloor area complying with the following:

A. The top of the openings shall be located not more than 12 inches below the bottom of the floor joists.

B. The openings shall be distributed approximately equally and located to provide cross ventilation, for example, by locating the opening along the length of at least two opposite sides of the building.

C. The openings shall be the larger of:

1. Openings of not less than 1.5 square feet for each 25 linear feet or fraction of exterior wall; or

2. Openings shall be equal to 1 percent of underfloor area.

D. The openings may be covered with corrosion-resistant wire mesh with mesh openings of greater than ¼ inch and less than ½ inch in dimension.

**91.7104.3.3. Buildings with Natural Ventilation.** A building with natural ventilation is a building constructed with the following:

A. The Unobstructed Openings shall exchange outside air.

B. The size of the Unobstructed Opening shall be the larger of:

1. Opening equal to at least 25 percent of the total perimeter wall area of the lowest level of the building, or

2. Opening equal to at least 25 percent of the floor area of the lowest level of the building.

C. The Unobstructed Openings shall be evenly distributed and located within the upper portion of at least two opposite exterior walls of the lowest level of the building.

Buildings with natural ventilation that are constructed as described above, shall have the utilities constructed with Trench Dams and Cable or Conduit Seal Fittings. If there is an enclosed room or space less than 150 square feet within

the building, then the enclosed room or space shall be constructed with vent openings that comply with the requirements of Section 91.7104.3.4.

**91.7104.3.4. Enclosed Room or Space within Building.** Individual enclosed rooms or enclosed spaces with floor area less than 2,000 square feet may be exempt from providing the Active System as required by Table 71, provided the vent openings comply with all of the following:

1. Vent openings are Unobstructed Openings, except screens made with at least ¼ inch mesh or wind driven turbines on the roof shall be permitted.
2. The aggregate size of vent openings shall be the larger of either five percent of the total floor area of the room or the area of enclosed space, or ten percent of the area of walls on the perimeter of the room or enclosed space.
3. The vent openings shall be located to prevent the accumulation of methane gases within the room or enclosed space.
4. The top of the vent opening shall be located not more than 12 inches below roof joists or ceiling joists if located in a wall of a building.
5. The vent openings shall be located on either two opposite walls or two adjacent walls of the room or enclosed space if located in a wall of a building.
6. The vent openings shall be located no more than 50 feet from any point within the room or enclosed space.
7. When using wind driven turbine, the area of the vent opening shall be calculated by the area of the opening at the attachment of the wind driven turbine at the roof.
8. When the vent opening is located in a wall of an adjoining room, then the adjoining room shall be constructed of either an Active System, or have Natural Ventilation as described in Section 91.7104.3.3.

**91.7104.3.5. Single Family Dwelling.** Single Family Dwellings and buildings accessory to single family dwellings shall comply with all the Methane Mitigation requirements of Table 71, except that the following mitigation system may be substituted:

A. Pressure Sensors below Impervious Membrane may be installed in lieu of Gas Detection System when Pressure Sensors below Impervious Membrane is not required; or

B. Single Station Gas Detectors with battery back-up may be installed in lieu of Alarm System and Gas Detection System; or

C. 6 mil thick Visquene may be used in lieu of Impervious Membrane, when the Site Design Levels are I or II; or

D. Additional Vent Risers or Mechanical Ventilation may be omitted for buildings with width less than 50 feet and footprint less than 6,000 square feet in area; or

E. Vent Risers may be substituted in lieu of Mechanical Extraction System, provided the Vent Risers are designed at a rate twice that established by the Methane Mitigation Standards.

**91.7104.3.6. Buildings Located in the Methane Buffer Zone.** A building, located entirely or partially in the Methane Buffer Zone, shall be designed to the requirements of the Methane Buffer Zone. Buildings located in the Methane Buffer Zone shall not be required to provide any methane mitigation system, if the Design Methane Pressure is less than or equal to two inches of water pressure and is either of the following:

A. Areas which qualify as Site Design Level I or II; or

B. Areas which qualify as Site Design Level III and the utilities are installed with Trench Dams and Cable or Conduit Seal Fitting.

**91.7104.3.7. De-watering System.** A De-watering system is not required for either of the following:

A. If during the site testing, the groundwater level is deeper than 10 feet below the Perforated Horizontal Pipes, or

B. If the soil investigation or analysis, as approved by the Department, reveals the groundwater level is more than 12 inches below the bottom of the Perforated Horizontal Pipes.

**91.7104.3.8. Buildings Located in the First Phase Playa Vista Project.** The First Phase Playa Vista project, as approved by the City on September 21, 1993 and December 8, 1995, shall comply with the methane mitigation program as required by the Department pursuant to the Methane Prevention, Detection and Monitoring

Program approved by the Department on January 31, 2001, in lieu of the requirements of this division.

**91.7104.4. Paved Areas.** Paved areas that are over 5,000 square feet in area and within 15 feet of the exterior wall of a commercial, industrial, institutional or residential building, shall be vented in accordance with the Methane Mitigation Standards.

**EXCEPTION:** Paved areas located in the Methane Buffer Zone and which qualify for Site Design Levels I, II or III.

#### **SEC. 91.7105. EXISTING BUILDINGS.**

Additions, alterations, repairs, changes of use or changes of occupancy to existing buildings shall comply with the methane mitigation requirements of Sections 91.7104.1 and 91.7104.2, when required by Divisions 34, 81 or 82 of this Code.

Approved methane mitigation systems in existing buildings shall be maintained in accordance with Section 91.7106.

#### **SEC. 91.7106. TESTING, MAINTENANCE AND SERVICE OF GAS- DETECTION AND MECHANICAL VENTILATION SYSTEMS.**

All gas detection and mechanical ventilation systems shall be maintained and serviced in proper working condition and meet all requirements of the Electrical and Mechanical Code. The testing, maintenance and service procedure for each gas-detection and mechanical ventilation systems shall be performed in accordance with the manufacturer's current written instructions and the following:

**A. Fire Department.** The manufacturer's instructions shall be approved by the Fire Department. Testing and servicing of each system shall be performed by a person certified by the Fire Department.

**B. Notification Placard.** A permanent notification placard shall be posted and maintained at the front entrance of a building that is constructed with Impervious Membrane, except in residential buildings. The placard shall indicate the presence of the Impervious Membrane.

#### **SEC. 91.7107. EMERGENCY PROCEDURES.**

With the exception of single-family dwellings, all buildings required by this division to have a gas-detection system or sub-slab vent system shall, subject to Fire Department approval, have established emergency procedures that include, but are not limited to, the following:



A. Assignment of a responsible person as safety director to work with the Fire Department in the establishment, implementation and maintenance of an emergency plan.

B. Conspicuous posting of the Fire Department's telephone number in areas designated by the Fire Department.

C. Conspicuous posting of emergency plan procedures approved by the Fire Department.

**SEC. 91.7108. APPLICATION OF METHANE SEEPAGE REGULATIONS TO LOCATIONS OR AREAS OUTSIDE THE METHANE ZONE AND METHANE BUFFER ZONE BOUNDARIES.**

Upon a determination by the Department of Building and Safety that a hazard may exist from methane intrusion at a geographical location or in an area outside the boundaries established in Section 91.7103 of this Code, the Department of Building and Safety and the Fire Department may enforce any or all of the requirements of Division 71 of this Code as required to preclude potential fire or explosion from methane concentration.

**SEC. 91.7109. ADDITIONAL REMEDIAL MEASURES.**

**91.7109.1. General Remedial Measures.** In the event the concentration of methane gas in any building located in a Methane Zone or Methane Buffer Zone 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.

**91.7109.2. Abandoned Oil Well.** Any abandoned oil well encountered during construction shall be evaluated by the Fire Department and may be required to be re-abandoned in accordance with applicable rules and regulations of the Division of Oil, Gas and Geothermal Resources of the State of California. Buildings shall comply with these provisions and the requirements of Section 91.6105 of this Code, whichever is more restrictive.

**TABLE 71. MINIMUM METHANE MITIGATION REQUIREMENTS.**

Site Design Level		LEVEL I		LEVEL II		LEVEL III		LEVEL IV		LEVEL V	
Design Methane Concentration (ppmv)		0-100		101-1,000		1,001-5,000		5,001-12,500		>12,500	
Design Methane Pressure (inches of water pressure)		≤2	>2	≤2	>2	≤2	>2	≤2	>2	All Pressures	
PASSIVE SYSTEM	De-watering System <sup>1</sup>		X	X	X	X	X	X	X	X	
	Sub-Slab Vent System	Perforated Horizontal Pipes	X	X	X	X	X	X	X	X	X
		Gravel Blanket Thickness Under Impervious Membrane	2"	2"	2"	3"	2"	3"	2"	4"	4"
		Gravel Thickness Surrounding Perforated Horizontal Pipes	2"	2"	2"	3"	2"	3"	2"	4"	4"
		Vent Risers	X	X	X	X	X	X	X	X	X
Impervious Membrane		X	X	X	X	X	X	X	X	X	
ACTIVE SYSTEM	Sub-Slab System	Pressure Sensors Below Impervious Membrane							X	X	
		Mechanical Extraction System <sup>2</sup>							X	X	
	Lowest Occupied Space System	Gas Detection System <sup>3</sup>		X		X	X	X	X	X	X
		Mechanical Ventilation <sup>3, 4, 5</sup>		X		X	X	X	X	X	X
		Alarm System		X		X	X	X	X	X	X
Control Panel			X		X	X	X	X	X	X	
MISC. SYSTEM	Trench Dam		X	X	X	X	X	X	X	X	
	Conduit or Cable Seal Fitting		X	X	X	X	X	X	X	X	
	Additional Vent Risers <sup>6</sup>									X	

X = Indicates a Required Mitigation Component

1. See Section 91.7104.3.7 for exception.
2. The Mechanical Extraction System shall be capable of providing an equivalent of a complete change of air every 20 minutes of the total volume of the Gravel Blanket.
3. See Section 91.7104.3.1 for Narrow Buildings.
4. The Mechanical Ventilation systems shall be capable of providing an equivalent of one complete change of the lowest

occupied space air every 15 minutes.

- 5. Vent opening complying with Section 91.7104.3.4 may be used in lieu of mechanical ventilation.
- 6. The total quantity of installed Vent Risers shall be increased to double the rate for the Passive System.

(95647)

Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located in the Main Street lobby to the City Hall; one copy on the bulletin board located at the ground level at the Los Angeles Street entrance to the Los Angeles Police Department; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

I hereby certify that this ordinance was passed by the Council of the City of Los Angeles, at its meeting of FEB 04 2004.

J. MICHAEL CAREY, City Clerk

By Maria R. Mendez  
Deputy

Approved FEB 12 2004

James Hahn  
Mayor

Approved as to Form and Legality

Rockard J. Delgadillo, City Attorney

By Sharon Siedorf Cardenas  
SHARON SIEDORF CARDENAS  
Assistant City Attorney

Date JAN 08 2004

File No. CF 01-1305

COUNCIL VOTE

Feb 4, 2004 11:07:59 AM, #6

ITEM NO. (5)

Voting on Item(s): 5

Roll Call *Later Reconsidered*

CARDENAS	Absent
GARCETTI	Absent
*GREUEL	Yes
HAHN	Yes
LABONGE	Yes
LUDLOW	Yes
MISCIKOWSKI	Yes
PARKS	Yes
PERRY	Yes
REYES	Yes
SMITH	Yes
VILLARAIGOSA	Absent
WEISS	Yes
ZINE	Yes
PADILLA	Absent

Present: 11, Yes: 11 No: 0

COUNCIL VOTE

Feb 4, 2004 11:31:51 AM, #9

ITEM NO. (5)

Voting on Item(s): 5

Roll Call *Reconsideration*

CARDENAS	Absent
GARCETTI	Absent
*GREUEL	Yes
HAHN	Yes
LABONGE	Yes
LUDLOW	Yes
MISCIKOWSKI	Yes
PARKS	Yes
PERRY	Yes
REYES	Yes
SMITH	Yes
VILLARAIGOSA	Absent
WEISS	Yes
ZINE	Yes
PADILLA	Yes

Present: 12, Yes: 12 No: 0

COUNCIL VOTE

Feb 4, 2004 11:32:05 AM, #10

ITEM NO. (5)  
Adopt as Amended

CARDENAS	Absent
GARCETTI	Absent
*GREUEL	Yes
HAHN	Yes
LABONGE	Yes
LUDLOW	Yes
MISCIKOWSKI	Yes
PARKS	Yes
PERRY	Yes
REYES	Yes
SMITH	Yes
VILLARAIGOSA	Absent
WEISS	Yes
ZINE	Yes
PADILLA	Yes
Present: 12, Yes: 12 No: 0	

---

**ATTACHMENT E**  
**TRAFFIC SUBPHASING PLAN**

---



**Table 5**

**VILLAGE AT PLAYA VISTA  
DRAFT MITIGATION SUBPHASING PLAN <sup>a</sup>**

<b>Subphase <sup>b</sup></b>	<b>P.M. Peak-Hour Trips per Subphase <sup>b</sup></b>	<b>Transportation System Improvements <sup>c, d, e, f</sup></b>	<b>Jurisdiction</b>
Village Subphase 1	575	1. Provide funding for 1 bus for Culver City Bus Line 6 (CC6)	Culver City
		2. Provide funding for 1 bus for Culver City Bus Line 2 (CC2)	Culver City
		3. Provide funding for Airport System ATCS	City of Los Angeles
		4. Provide funding for Transit Priority System (TPS) on Lincoln Corridor	City of LA/Caltrans
		5. Signal improvement (phasing) at Lincoln Bl/83rd St	City of LA/Caltrans
		6. Provide funding for neighborhood traffic management	City of Los Angeles
Village Subphase 2	575 (1,150 cumulative)	1. Provide funding for 2 buses for CC4 (includes extension to Playa Del Rey)	Culver City
		2. Physical and/or operational improvements at:	
		2a. Centinela Av/Venice Bl	City of LA/Caltrans
		2b. Green Valley Circle/Centinela Avenue	Culver City
		2c. La Tijera Bl/Centinela Av	City of Los Angeles
		2d. Overland Av/Culver Bl	Culver City
		2e. Sawtelle Bl/Culver Bl	Culver City
		3. Provide funding for signal improvement at Aviation Bl/Florence Av/Manchester Av	City of Inglewood
		4. Project component – Jefferson Boulevard corridor improvement (between Beethoven Av to Centinela Av) <sup>g</sup>	City of Los Angeles
		5. Project component – complete Bluff Creek Dr corridor improvement (Dawn Creek to Westlawn) <sup>g</sup>	City of Los Angeles
6. Campus Center Drive between Millennium and Bluff Creek Drive – Public Access	City of Los Angeles		
Village Subphase 3	575 (1,725 cumulative)	1. Provide funding for Smart Corridor System ATCS	City of Los Angeles
		2. Extension of internal shuttle to off-site locations	LA/Culver City/LA County
		3. Physical and/or operational improvements at:	
		3a. Centinela Av/Culver Bl	City of Los Angeles
		3b. Centinela Av/Washington Pl	Culver City
		3c. La Brea Av/Centinela Av	City of Inglewood
		3d. Palawan Way/Admiralty Way	Los Angeles County

Subphase <sup>b</sup>	P.M. Peak-Hour Trips per Subphase <sup>b</sup>	Transportation System Improvements <sup>c, d, e, f</sup>	Jurisdiction
Village Subphase 4	575 (2,300 cumulative)	<ol style="list-style-type: none"> <li>1. Provide funding for 2 buses for CC6 Limited</li> <li>2. Operational improvement at I-405 NB Ramps/Jefferson Bl</li> <li>3. Centinela Avenue corridor improvement (Culver to SR-90)</li> </ol>	<p>Culver City</p> <p>Culver City/Caltrans</p> <p>City of Los Angeles</p>

<sup>a</sup> The subphasing plan may be revised, where appropriate and as determined by LADOT: (1) upon demonstration that measures for each subphase in the revised subphasing plan are equivalent or superior to the original mitigation measures; and/or (2) upon demonstration that approval or implementation of measures has been delayed, provided that the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<sup>b</sup> P.M. peak-hour trip generation for each subphase would determine the specific traffic improvements shown. P.M. peak-hour trip generation to be estimated as subphases develop using the following factors:  
 Dwelling Units – 0.54 trip per unit  
 Office – 1.74 trips per 1,000 sf  
 Retail – 3.83 trips per 1,000 sf (includes pass-by reduction)  
 Community Serving Uses – 0.45 trip per 1,000 sf (includes internal capture reduction)

<sup>c</sup> Prior to the issuance of any building permit for each subphase, all on- and off-site mitigation measures for the subphase shall be complete or suitably guaranteed satisfactory to LADOT.

<sup>d</sup> Temporary Certificates of Occupancy may be granted in the event of any delay through no fault of the Applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT.

<sup>e</sup> Substitute mitigation measures may be provided subject to approval by the agency with jurisdiction over the location of the measure, upon demonstration that the substitute measure is equivalent or superior to the original mitigation measure.

<sup>f</sup> Prior to the issuance of the final Certificate of Occupancy in the final subphase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT.

<sup>g</sup> The Jefferson Boulevard and Bluff Creek Drive corridors are components of the Proposed Project. Neither improvement serves to mitigate any Project impact; they are included in this table to establish timing for completion.

---

**ATTACHMENT F**  
**PEDESTRIAN ROUTES MAP**

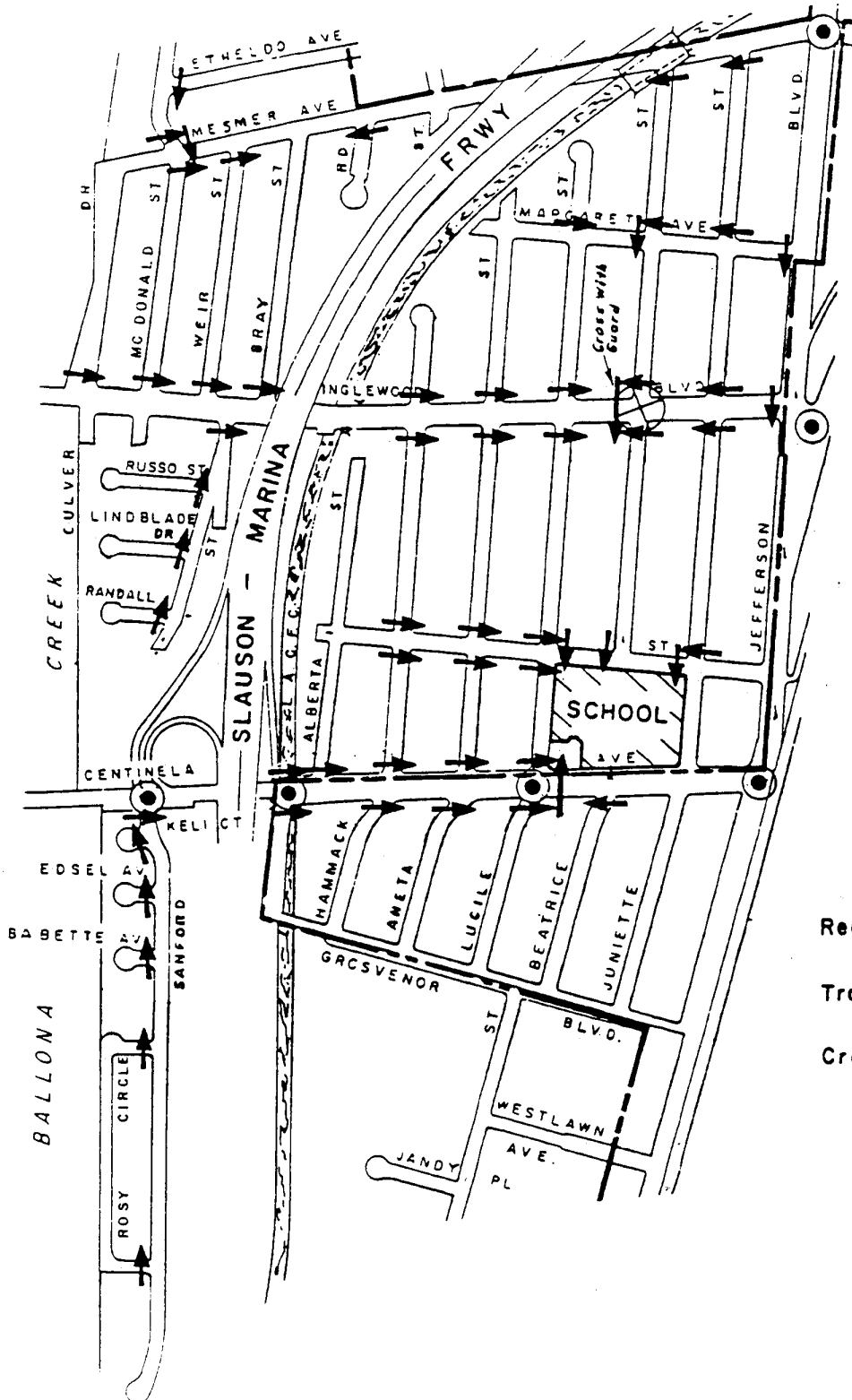
---

# PEDESTRIAN ROUTES

To

# PLAYA DEL REY SCHOOL

112



**Parents:**

This map shows the recommended crossings to be used from each block in your school service area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take.

Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Observe marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may sometimes be necessary.

**Legend**

- Recommended Crossing
- Traffic Signal
- Crossing Guard



City of Los Angeles  
DEPARTMENT OF TRANSPORTATION  
S. Edwin Rowe, Gen. Mgr.  
COUNCIL DISTRICT NO. 6  
Rev. 7/93

---

## IV. LIST OF NEW REFERENCES TO THE FINAL EIR

---

The following list is a compilation of reference documents that have been added to the Final EIR. These references are organized according to topics in which they either occur or are most substantially connected. The references are on file with the City of Los Angeles Planning Department: 200 North Spring Street, Room 720, Los Angeles, CA 90012.

### A. WATER RESOURCES

- A-1. Reclaimed Water Agreement between West Basin Municipal Water District and City of Los Angeles, June 13, 1991.
- A-2. Los Angeles Regional Water Quality Control Board, open letter regarding the Public Storm Drain Permit (with attachment), January 30, 2002.
- A-3. Kadlec, Robert and Robert Knight. Treatment Wetlands. 1996. Lewis Publishers: Boca Raton and New York. (excerpts).
- A-4. State Water Resources Control Board, map regarding the 303(d) listing of the Ballona Wetlands.
- A-5. Read, Edith, Ph.D, Center for Natural Lands Management and Eric Strecker, Ph.D, GeoSyntec Consultants, Ballona Freshwater Marsh at Playa Vista, Annual Report of Monitoring, Operation and Maintenance. December 2003.
- A-6. U.S. Environmental Protection Agency, Water Quality Models, online at: <http://www.epa.gov/waterscience/wqm/>
- A-7. In the Matter of the Review on its Own Motion of Waste Discharge Requirements for the Avon Refinery, State Water Resources Control Board Order WQ 2001-06
- A-8. Los Angeles County Department of Public Works, Stormwater Quality Summary Data, online at: [http://ladpw.org/wmd/NPDES/wq\\_data.cfm](http://ladpw.org/wmd/NPDES/wq_data.cfm)
- A-9. T.S. Schueler, "Microbes and Urban Watersheds: Ways to Kill 'Em." in *The Practice of Watershed Protection* (T.R. Schueler, et al. eds.) (2000)

- A-10.** State Water Board Staff Report, Revision of the Clean Water Act Section 303(d) List of Water Quality Limited Segments (Feb. 2003) online at:  
[http://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)
- A-11.** Los Angeles Regional Water Board, Ballona Creek and Wetlands Trash TMDLs, September 19, 2001. Online at: [http://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)
- A-12.** State Water Resources Control Board, Nonpoint Source Program Strategy and Implementation Plan, 1998-2013 (PROSIP) (2000)
- A-13.** 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)
- A-14.** 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, (Feb. 22-26, 1999 Auckland, New Zealand)
- A-15.** S.B. Grant et al., 2001 Progress Report: Identification and Control of Non-Point Sources of Microbial Pollution in a Coastal Watershed , online 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)
- A-16.** California Regional Water Quality Control Board, Los Angeles Region, Resolution No. 2002-022, December 12, 2002.
- A-17.** Los Angeles Regional Water Board, Santa Monica Bay Wet-Weather Bacteria TMDL, Draft November 11, 2002, online at:  
[http://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)
- A-18.** Environmental Protection Agency, Diazinon Revised Risk Assessment and Agreement with Registrants. Revised January 2001. online at:  
<http://www.epa.gov/pesticides/op/diazinon/agreement.pdf>
- A-19.** 40 C.F.R. § 122.26(d)(2)(iv)(B)(1), Permit Application and Special NPDES Program Requirements.

- A-20.** 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)
- A-21.** State Water Resources Control Board, Order No. 99-08-DWQ. Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activity (NPDES General Permit No. CAS000002).
- A-22.** Los Angeles County 2002 Stormwater/Urban Runoff Public Education Program Model Program, online at: [http://ladpw.org/epd/ea/stormwater/5yredu\\_tc02.cfm](http://ladpw.org/epd/ea/stormwater/5yredu_tc02.cfm)
- A-23.** State Water Resources Control Board, letter to Robert Miller, Maguire Thomas Partners, regarding Conditional Water Quality Certification Under Clear Water Act Section 401, July 3, 1995.
- A-24.** T.R. Reinertsen, “Quality of Stormwater Runoff from Streets,” 2nd International Conference on Urban Storm Drainage, Proceedings (1981)
- A-25.** Los Angeles Regional Water Quality Control Board, Order No. R4-2003-0111, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project in Coastal Watersheds of Los Angeles and Ventura Counties. (General NPDES Permit No. CAG 994004)
- A-26.** Los Angeles Regional Water Quality Control Board, 2002 CWA Section 303(d) List of Water Quality Limited Segments (Approved by the USEPA, July 2003).
- A-27.** California Coastal Commission, Application #5-91-463-A2, California Coastal Commission Staff Report: Permit Amendment, Item W17a (March 27, 1992).
- A-28.** Fax from Sharon H. Lockhart to John Gill regarding the Playa Vista Freshwater Systems Monitoring Plan.
- A-29.** California Coastal Commission, Adopted Findings, Application Number 5-91-463, (Filed July 17, 1991).
- A-30.** Los Angeles Regional Water Quality Control Board, Order No. 01-182, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities Therein, Except the City of Long Beach, December 13, 2001.

- 
- A-31.** In the Matter of the Review of the Petitions of the Cities of Bellflower, et al., The City of Arcadia, and Western States Petroleum Association. State Water Resources Control Board Order: WQ 2000-11
- A-32.** U.S. Environmental Protection Agency, Sewer Sediment Control, Overview of an EPA Wet Weather Flow Research Program, EPA Document EPA/600/J-03/188.
- A-33.** Urban Stormwater BMP Performance Monitoring: A Guidance Manual for Meeting the National Stormwater BMP Database Requirements, online at: [www.bmpdatabase.org](http://www.bmpdatabase.org)
- A-34.** City of Austin, Texas, The First Flush of Runoff and Its Effects on Control Structure Design (1990)
- A-35.** County of Los Angeles, Department of Public Works, Stormwater Monitoring Reports, [http://www.ladpw.com/WMD/npdes/report\\_directory.cfm](http://www.ladpw.com/WMD/npdes/report_directory.cfm)
- A-36.** U.S. Federal Highway Administration, Pollutant Loadings and Impacts from Highway Stormwater Runoff, Vol. III: Analytical Investigation and Research Report (FHWA Publications No.: FHWA RD-88-008)

**B. SAFETY/RISK OF UPSET**

- B-1.** Preliminary Endangerment Assessment, Tentative Tract Map No. 49104-07 Lots 5 (Western Portion) & 6 (Eastern Portion) Playa Vista Property, December 5, 2003.
- B-2.** Letter Report to Mr. Adnan Siddiqui, RWQCB, Former Fire Safety Training Area – Phase 1 Project Area, Additional Soil. Characterization Activities for Dioxins and Furans, Playa Vista Site, Los Angeles, October 16, 2002.
- B-3.** Kaplan, Dr. Isaac, Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina Del Rey, California, January 20, 1994.
- B-4.** Playa Capital Company, LLC, Playa Vista's Response to Appeals to the Board of Building and Safety Commissioners seeking revocation of Playa Vista's Grading and Building Permits. July 26, 2000.



- 
- B-5.** Playa Capital Company, LLC, Submission in response to the Board of Building and Safety Commissioners seeking revocation of certain of Playa Vista's building permits. April 15, 2001.
- B-6.** Playa Vista Disclosure Statement, Updated as of February 19, 2004.
- B-7.** Master Declaration of Covenants, Conditions, Restrictions and Reservation of Easements for Playa Vista, A Master Planned Community.
- B-8.** City of Los Angeles Board of Building and Safety Commissioners, File Nos.: 010041-010042, June 12, 2001.
- B-9.** City of Los Angeles Board of Building and Safety Commissioners, File Nos.: 003130, 00146-000153, 000161-000162, and 000170-000180.
- B-10.** The City of Los Angeles Board of Building and Safety Commissioners File No. 030128.
- B-11.** Kaplan, Isaac, R., Zymax Forensics, Inc, 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, January 19, 2001.
- B-12.** Kaplan, Isaac, R., Zymax Forensics, Inc. and Robert Poreda, Department of Earth and Environmental Sciences, University of Rochester. Report to the City of Los Angeles, Department of Building and Safety on the Playa Vista Development, Playa Vista, California. Comparison of Gas Analyses from Southern California Gas Company Injection and Observation Wells with Soil Gas and Groundwater Gas from 50ft Gravel Aquifer. January 29, 2001.
- B-13.** DTSC (Department of Toxic Substances Control). 1999. Preliminary Endangerment Assessment Guidance Manual. January
- B-14.** 1992. Supplemental Guidance for Human Health Multimedia Risk Assessment of Hazardous Waste Sites and Permitted Facilities. July
- B-15.** OEHHA (Office of Environmental Health Hazard Assessment). 2003. A Guide to Public Health Goals for Chemical in Drinking Water. October.

- B-16.** 2004. Guidance for School Site Risk Assessment Pursuant to Health and Safety Code Section 901f: Guidance for Assessing Exposures and Health Risks at Existing and Proposed School Sites. February.
- B-17.** U.S. EPA (United States Environmental Protection Agency). 1991. Role of the Baseline Risk Assessment in Superfund Remedy Selection and Decisions. OSWER Directive 9355.0-30.
- B-18.** 1989. Risk Assessment Guidance for Superfund. Volume 1. Human Health Evaluation Manual (Part A). EPA/540/1-89/002
- B-19.** 1997. California Environmental Protection Agency (Cal/EPA), Selecting Inorganic Constituents as Chemicals of Potential Concern at Risk Assessments at Hazardous Waste Sites and Permitted Facilities, HERD, DTSC, February.
- B-20.** 2001a. California Environmental Protection Agency (Cal/EPA), Office of Environmental Health Hazard Assessment (OEHHA), Cancer Potency Values, electronic databases, online at: <http://www.oehha.ca.gov/risk/ChemicalDB/index.asp>.
- B-21.** 2001b. California Environmental Protection Agency (Cal/EPA), Office of Environmental Health Hazard Assessment (OEHHA), Chronic Reference Exposure Levels, electronic databases, online at: <http://www.oehha.ca.gov/risk/ChemicalDB/index.asp>.
- B-22.** 1985. Cowherd et al., Rapid Assessment of Exposure to Particulate Emissions from Surface Contaminated Sites, Midwest Research Institute, Kansas City, MO, Pub. PB85-192219.
- B-23.** 1991a. U.S. Environmental Protection Agency (EPA), Risk Assessment Guidance for Superfund (RAGS), Vol. 1, Human Health Evaluation Manual, Part B, Development of Risk-Based Preliminary Remediation Goals, Office of Emergency and Remedial Response.
- B-24.** 1991b. U.S. Environmental Protection Agency (EPA), Risk Assessment Guidance for Superfund (RAGS), Vol. 1, Human Health Evaluation Manual, Part C, Risk Evaluation of Remedial Alternatives, Interim Final, Office of Emergency and Remedial Response, EPA 9285, 7-01C.
- B-25.** 1992a. U.S. Environmental Protection Agency (EPA), Dermal Exposure Assessment, Applications, Office of Research and Development, EPA 600/8-91/011B.

- B-26.** 1996b. U.S. Environmental Protection Agency (EPA), Soil Screening Guidance: Technical Background Document, Office of Solid Waste and Emergency Response, Wash. D.C., PB96-963502, EPA/540/R-95/128.
- B-27.** 1996c. U.S. Environmental Protection Agency (EPA), Soil Screening Guidance, User's Guide, Office of Emergency and Remedial Response, Wash. D.C., PB96-963505, EPA/540/R-96/018.
- B-28.** 1997b. U.S. Environmental Protection Agency (EPA), Exposure Factors Handbook, Volume I, General Factors, August.
- B-29.** 2000b. U.S. Environmental Protection Agency (EPA), User's Guide for the Johnson and Ettinger (1991) Model for Subsurface Vapor Intrusion into Buildings (Revised), Wash. D.C., Office of Emergency and Remedial Response, December.
- B-30.** 2001a. U.S. Environmental Protection Agency (EPA), Integrated Risk Information System (IRIS) database, online at: <http://www.epa.gov/iris/subst/index.html>.
- B-31.** 1998. U.S. Environmental Protection Agency (EPA), Health Effects Assessment Summary Tables (HEAST), Annual Update FY 1998 (latest available), Office of Emergency Remedial Response, Wash. D.C., OERR9200, 6303 (92-1).
- B-32.** 2000a. U.S. Environmental Protection Agency (EPA), EPA Region 9 Preliminary Remediation Goals, San Francisco, CA, November 22.
- B-33.** 1993. California Environmental Protection Agency (Cal/EPA), Health Effects of Benzo(a)pyrene, Air Toxicology and Epidemiology Section, Berkeley, CA.
- B-34.** 1988c. U.S. Environmental Protection Agency (EPA), Superfund Exposure Assessment Manual (SEAM), Office of Solid Waste Emergency Response (OSWER) Directive 9285, 5-1, Office of Remedial Response, EPA/540/1-88/001.
- B-35.** Letter from David Chernik, Environmental Project Manager, Playa Vista, to Ms. Sue Chang, Department of City Planning, regarding Verification That No Soil Was Imported From Malibu (March, 26, 2004).

---

## V. LIST OF NEW APPENDICES TO THE FINAL EIR

---

### A. EARTH

- A.1** Group Delta Consultants. Final Assessment, Slopes Below Cabora Road Riparian Corridor, Playa Vista Development, Los Angeles, CA. GDC Project No. L-194B, December 3, 2001, revised January 31, 2002, and approved on February 19, 2002.

### B. AIR QUALITY

- B.1** Local Carbon Monoxide Model Output Under Traffic Baseline Scenario.
- B.2** Local Carbon Monoxide Modeling Sensitivity Analysis.
- B.3** Updated Construction Air Quality Dispersion Calculations and Concentrations.

### C. WATER RESOURCES

- C.1.** Letter from David J. Castanon, Acting Chief, Regulator Branch, United States Army Corps of Engineers, to the Applicant regarding the Freshwater Wetlands System, July 18, 2003.
- C.2** Letter from Dennis Dickerson, Executive Officer, Los Angeles Regional Water Quality Control Board, to Paul N. Singarella, Esq., Latham & Watkins, (January 16, 2003).
- C.3** Psomas, Ballona Wetlands Freshwater Wetland System, Habitat Mitigation and Monitoring Plan, November 1995. (Volume 1).

### D. BIOTIC RESOURCES

- D.1** Read, Edith, Ph.D., Playa Vista Bluff Restoration Planting Materials, Performance Standards, and Maintenance and Monitoring Program, March 15, 2004.

---

**E. NOISE**

- E.1** Updated Noise Modeling Output, Alternative Noise Analysis (No Playa Vista Drive Scenario).

**F. SAFETY/RISK OF UPSET**

- F.1** Addendum to Phase 1 Residential Area Health-Based Remediation Goals, Playa Vista Development Project, Los Angeles, California Responses to Comments, dated September 19, 2002.
- F.2** 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.
- F.3** Integrated Environmental Services, Inc., Health Based Remediation Goals, February 2000.
- F.4** Integrated Environmental Services, Inc., Addendum to Phase 1 Commercial Health-Based Remediation Goals, Playa Vista Development, September 25, 2001.
- F.5** Integrated Environmental Services, Inc., Phase 1 Residential Health-Based Remediation Goals, Playa Vista Development Project, Los Angeles, California, November 9, 2001.
- F.6** California Environmental Protection Agency Secretary, Winston Hickox, letter to Grassroots Coalition September 16, 2003.
- F.7** California Regional Water Quality Control Board, Los Angeles Region. Letter to Department of Toxic Substances Control entitled: Memorandum Dated May 29, 2001, City Investigation of Potential Issues of Concern and Human Health Risk Assessment – Playa Vista Development Project, 6775 Centinela Avenue, Los Angeles, California (CAO No. 98-125, File No. 98-192, SLIC No. 0773, Site ID No. 2043W-00). August 9, 2002.
- F.8** 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.

- F.9** City of Los Angeles, Office of the Chief Legislative Analyst, letter to the Department of Toxic Substances Control regarding the CLA Report, June 5, 2001.
- F.10** Department of Toxic Substances Control, letter to the City's Chief Legislative Analyst regarding the CLA Report, June 12, 2001.
- F.11** Heliport Consultants. Letter regarding Helistop Noise Study for Playa Vista. December 7, 1995.
- F.12** U.S. Environmental Protection Agency, letter to David Nelson, Playa Vista from USEPA, Region IX, Regarding the Attached "Expanded Site Investigation Report of the Hughes Helicopter Site" (report dated May 2003), October 25, 2003.

## **G. TRAFFIC**

- G.1** Table for the Response to the City of Culver City. The Village at Playa Vista Project – Assessment of Culver City Modifications to Improvements, Intersection Operating Conditions – Future 2010 with Project Mitigations & Updated Culver City Mitigations – No Playa Vista Drive Bridge Baseline.
- G.2** Amendment to the Initial Traffic Assessment for the Proposed Village at Playa Vista Project (EIR No. ENV-6129-EIR), City of Los Angeles Department of Transportation, March 25, 2004.
- G.3** Technical Memorandum, The Village at Playa Vista, No Playa Vista Drive Bridge Scenario and Updated Mitigations, Raju Associates Inc., March 22, 2004.

## **H. SCHOOLS**

- H.1** Los Angeles Unified School District, Information Technology Division. Comments on Student Generation Study for the Playa Vista Development. Inter-Office Correspondence from Rena Perez to Joan Friedman, September 16, 1999.
- H.2** Los Angeles Unified School District, Facilities Services Division. Letter regarding Playa Vista School Site by Kathi Littmann, Deputy Chief Executive, School Building Planning, March 20, 2002.

**I. UTILITIES**

- I.1** Los Angeles Department of Water and Power, Water Supply Assessment for the Village at Playa Vista Project, July 28, 2003.

**J. CULTURAL RESOURCES**

- J.1** Altschul, Jeffrey H., et.al., Playa Vista Archaeological and Historical Project, Data Recovery Plan for CA-Lan-62 and CA-Lan-211. Statistical Research. 1991.
- J.2** Altschul, Jeffrey H., et.al., Playa Vista Archaeological and Historical Project, Research Design, Statistical Research Technical Series No. 29, Part 1.
- J.3** Dorame, Robert. The Gabrielino Tongva Indians of California Tribal Council, Procedures for the Treatment and Disposition of Human Remains, Associated Grave Goods and Patrimonial Items at Gabrielino Tongva Ancestral Sites.
- J.4** Dorame, Robert. Gabrielino/Tongva Indian Nation, Consulting and Monitoring Guidelines.

**K. DRAFT EIR COMMENT LETTER SUBMITTALS**

---

## VI. TOPICAL RESPONSES TO COMMENTS

---

The following Topical Responses have been written to provide a broad overview of issues that could be responded to in a general fashion. They provide responses to comments that were raised in numerous letters, and thus can be more efficiently addressed with a single response. The Topical Responses are cross-referenced in the responses to individual letter comments where they are applicable. The list of Topical Responses includes the following:

Traffic:

- TR-1: Playa Vista Transportation Model
- TR-2: The Village at Playa Vista Trip Distribution
- TR-3: Related Projects
- TR-4: The Village at Playa Vista Transit Plan Effectiveness
- TR-5: Neighborhood Traffic Impacts
- TR-6: Relationship with Community Plan Policies
- TR-7: Study Intersections
- TR-8: Significant Impacts May Remain
- TR-9: Traffic: First Phase Project (VTTM 49104), Condition No. 116
- TR-10: Alternative 2010 Baseline Scenario – Additional Mitigation Measure

Earth/Site Activities:

- TR-11: Grading, Erosion Control and Vegetation Maintenance Activity in the Project Area

Safety/Risk of Upset:

- TR-12: Soil-Gas

General:

- TR-13: First Phase Project Litigation History



---

**TOPICAL RESPONSE**  
**TR-1: PLAYA VISTA TRANSPORTATION MODEL**

---

The Playa Vista Transportation Model was developed using a state-of-the-art traffic demand forecasting computer modeling package. This computer software package known as the EMME/2 Transportation Modeling Software is widely used by Metropolitan Transportation Organizations and other transportation planners around the world, including numerous transportation agencies within cities and counties throughout the United States, such as the cities of Los Angeles, Long Beach, Burbank, and Pasadena in California; Portland, Oregon; Chicago, Illinois; and Seattle, Washington.

The Playa Vista Transportation Model using this EMME/2 package forecasts traffic on a defined streets and highway network all built into the model. The model is used to project traffic on the street and highway network including existing traffic, future traffic growth and traffic from new projects. The model is calibrated to real world traffic conditions so that it accurately reflects what is happening in the existing traffic environment as described more specifically below. The process used in the development and application of the Playa Vista Model is described in detail in the Technical Appendix K-3 of Volume XX of the Draft EIR under the section titled “Appendix Volume 1B – Model Development Process.”

The overall process used in the traffic study for the Proposed Project consisted of three key modules: (1) a travel demand forecasting process computer module; (2) a post-processing computer module; and (3) a data analysis and evaluation computer module. A module is a segregable part of the overall computer model. Detailed descriptions of each of these computer modules and sub-processes are provided in the above referenced Technical Appendix of the Draft EIR. A brief summary of this overall process including key information relevant to providing clarification in response to comments is provided below.

## **MODEL DEVELOPMENT**

The Model process is based on the Southern California Association of Governments (SCAG) model and the City of Los Angeles model, known as the General Plan Framework model (GPF). The Southern California Association of Governments is a governmental agency which provides coordination for regional planning issues for a five-county area, including Los Angeles. As part of its mission, SCAG has developed a complex computer model which forecasts traffic for the Southern California region. This model also is used in part by the City of Los Angeles in developing its long range transportation model.

As stated in the referenced Technical Appendix K-3, Volume XX of the Draft EIR, the travel demand forecasting model used for the Village Project at Playa Vista is a “focused” model, as described below. The model consists of the actual street and highway networks and trip tables. The model breaks the region into traffic analysis zones (TAZs). The trip tables store trips between specific areas (TAZs) included in the model. These TAZs are designed to include land uses (homes, jobs, and businesses) from which trips are generated. The traffic analysis zones are also represented in the street and highway network as special nodes or centroids. The trips between these traffic analysis zones are assigned on the model network to produce traffic forecasts. These traffic flows are then calibrated to actual traffic counts taken from the streets and highways.

As part of focusing a model, such as was done for the Draft EIR, greater degrees of detail are provided in the definition of traffic analysis zones and supporting highway and street network in the study area. This allows the model to more closely track and simulate all the traffic between the zones in a defined traffic study area. As the model areas become more distant from the project, the traffic analysis zones are more aggregated. For example, the SCAG and City model TAZs that were census tracts or combinations of census tracts were split or disaggregated to sub-census tract level of detail in the study area within this Playa Vista focused model. The “focusing” of the model is concentrated adjacent to the project where finer zones and greater network detail are provided in the model. Additionally, greater street network detail was added within the study area to support the finer land use zone system. This detailed highway network in the model included all freeways, major arterials, secondary arterials, most collectors and key local streets to help in the preparation of accurate travel forecasts as depicted in Figure 4-7 of Appendix K-2, Volume XX, Technical Appendix K of the Village at Playa Vista Draft EIR. The model provides the most reliable way to simulate traffic with a large area.

The model development task involved the following sub-tasks:

- Highway Network Development
- Trip Table Development
- Traffic Assignment Process
- Model Calibration & Validation

## **Highway Network Development**

The highway network development task involved representing the transportation system supply characteristics in a base highway simulation network synthesized in the model. Key operational and functional attributes are included on each roadway link in the model. Some of these attributes include number of lanes, speed, capacity, length, and functional classification of

the facility. These attributes were all extensively checked and verified in the field to accurately represent actual prevailing conditions on the facilities. As a result, the model not only included a very fine level of detail in network representation, but also accurately reflected base year prevailing highway network conditions by providing field-verified link speeds, number of lanes, capacity and functional class. Again, additional details of this task are provided in the Technical Appendix K-3 Volume XX of the Draft EIR, as referenced above. The modeled network included scenarios both with and without Playa Vista Drive bridge and road.

### **Trip Table Development**

The Trip Table development task involved preparation of trip tables representing transportation system demand between traffic analysis zones for each of the peak hours (A.M. and P.M.) in the model. These trip tables were synthesized utilizing a basic, three-step mathematical process – Trip Generation, Trip Distribution, and Mode-Split/Time-of-Day characterization. The Trip Generation model predicts the level of trip-making based on land-use and socio-economic data and this was based on the SCAG’s data set. The trip distribution model utilized for the Playa Vista Transportation Model was the same as that used by SCAG for trip distribution. The “Gravity Model” type of mathematical formulation 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.” Travel impedance is a function or measure of travel times and travel costs; in other words, it represents traffic congestion. The functional form and details of the Gravity Model are provided in the Technical Appendix referenced above. The mode-split/time-of-day characterization in the Playa Vista model utilized the same data set as that used by SCAG.

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.

Time-of-day characterization refers to the effects of time of day activities and involves the conversion of daily trips to peak-period trips. The time-of-day conversion factors used in the Playa Vista Transportation Model were those developed by SCAG based on detailed surveys performed in the Southern California region.

### **Traffic Assignment Process**

The traffic assignment model is the process utilized to assign the peak-hour travel demand (from the trip tables) on the highway network (transportation system supply). This model results in estimation of peak-hour traffic flows on each of the roadway links in the transportation system. The type of traffic assignment process utilized by the Playa Vista model is the iterative capacity-constrained equilibrium assignment technique.

The equilibrium assignment technique is based on accepted transportation model technique called Wardrop's user optimal principle. At equilibrium, all possible paths considered (including "short-cuts") between any origin and destination zone will have equal travel times. Thus, the capacity-constrained equilibrium traffic assignment technique takes into consideration available capacity (or, in other words, degree of congestion) in the network while balancing all possible paths to and from an origin and its destination.

This equilibrium traffic assignment technique is sensitive to, and reacts to, congestion on the transportation system such that all possible paths are tested and utilized in the assignment of trips between (to and from) all traffic analysis zones. The result is a traffic assignment that reflects congested traffic flows on the network. This technique is most frequently used by Metropolitan Planning Organizations (MPOs) and other transportation planners, including the jurisdictions mentioned above. This assignment methodology provides consistent, reasonable and realistic traffic flows in a simulation model. Details of this methodology are provided in the Draft EIR's Technical Appendix referenced above.

### **Model Calibration and Validation**

The process by which the model is adjusted to produce traffic volume assignments that closely resemble actual ground counts on streets and intersections is called the Model Calibration/Validation Process. The Playa Vista Model was validated to a greater degree of precision and agreement than the "acceptable standards" guidelines offered by the nationally accepted National Cooperative Highway Research Program Report 255 (NCHRP 255), "Highway Traffic Data for Urbanized Area Project Planning and Design," published by the Transportation Research Board. The model was validated on an overall basis to within a 1 to 2 percent variance between model-generated traffic and actual counts, making it one of the most precise models in Southern California. Tables 1B-1 and 1B-2 in the Draft EIR's

above-referenced Technical Appendix provides details of individual screen-line and cut-line comparisons and the overall validation results for A.M. and P.M. peak hours, respectively. Actual counts at more than 1,000 data points, including intersection and link counts, were utilized in the model validation effort. The Technical Appendix K-3, Volume XX of the Draft EIR for the Village at Playa Vista provides details of the model development and validation/calibration results under the subsection Technical Volume 1B.

## **MODEL APPLICATION**

The calibrated/validated travel demand model was utilized along with future land use/socio-economic data and future funded roadway improvement data to produce future travel forecasts. Future land use/socio-economic growth projections by SCAG were included in the model, and only those transportation projects which are actually funded were added to the model network, based on their projected year of completion. Using these future travel forecasts for the various roadway links from the model, specific intersection traffic volume forecasts were developed for the year 2010 conditions. This was accomplished utilizing state-of-the-art methodologies proposed by “Furness and Mekky” as well as the “growth-factor” methodologies. Details of the data-processing and data-flow methodologies are provided in the Technical Appendix K-3, Volume XX, referenced above.

## **DATA ANALYSES**

The intersection capacity analyses were performed using a method that assesses the cumulative operating conditions at each study intersection, as stated in the Technical Appendix K-3, Volume XX of the Draft EIR. The Critical Movement Analysis (CMA) methodology was utilized to analyze signalized intersections in this study. This methodology is recognized as a preferred and acceptable methodology by LADOT per its Traffic Study Policies and Guidelines. The methodology also ensures consistency with analyses performed for the Coastal Transportation Corridor Specific Plan (CTCSP) and the Los Angeles County Congestion Management Program (CMP).

Un-signalized intersections were analyzed using the Highway Capacity Manual (HCM) Methodology. For the City of Santa Monica intersection locations, Traffix software was utilized to determine the levels of service, as requested by the City of Santa Monica.

In summary, the Village at Playa Vista Transportation Model utilized a widely accepted transportation model called EMME/2, focused it on the project area, calibrated/validated it with real data, and analyzed the results using standardized methodologies. The use of regional data, a focused model with state-of-the-art procedures, validated to within a 1 to 2 percent variance, the

extensive use of a large database and consistent nationally- and locally- acceptable methodologies for evaluating intersection and roadway operations allowed the project impacts to be identified and assessed in a realistic and precise manner.

---

**TOPICAL RESPONSE**  
**TR-2: THE VILLAGE AT PLAYA VISTA TRIP DISTRIBUTION**

---

The Playa Vista Trip Distribution Model uses the “Gravity Model” formulation, as stated and detailed in the Technical Appendix K-3 of the Village at Playa Vista Draft EIR under a section titled “Appendix Volume 1B – Model Development Process”. As discussed below, the Gravity Model formulation is nationally-accepted and the most commonly used trip distribution model formulation.

An Informational Report of the Institute of Transportation Engineers, titled “*Travel Demand Forecasting Processes Used by Ten Large Metropolitan Planning Organizations (MPOs)*”, was examined to ascertain and compare the processes used in the MPOs with those used in the Playa Vista Transportation Model. The MPOs, all of them with a population over 2 million, included Atlanta, Baltimore, Boston, Dallas-Fort Worth, Denver, Detroit, Philadelphia, Pittsburgh, St. Louis and Washington D.C. This report consisted of summaries of travel forecasting processes written by modeling experts from the respective metropolitan areas. The report states that all these areas are currently using the Gravity Model formulation for the Trip Distribution Process in their respective models, making it the most commonly used and widely accepted formulation for trip distribution. Certain potential technical enhancements to the implementation of this Gravity Model formulation were discussed in the Information Report of the Institute of Transportation Engineers report. All these enhancements were a part of the Trip Distribution Model structure of the Playa Vista Travel Forecasting Model.

The Proposed Project is an integrated mixed-use, master planned community comprised of residential, commercial, recreational, and community-serving uses. However, the majority of the external A.M. and P.M. peak hour trips assigned to the roadway network are home-to-work trips originating from the residential uses within the Proposed Project. To verify the model’s distribution of trips, the distribution of land-use and socioeconomic data and their growth projected to the future year 2010 were examined from the Southern California Association of Government’s (SCAG’s) travel demand forecasting model database, to identify projected employment growth for the following areas – City of Santa Monica, Marina del Rey, Westwood and Century City growth areas to the north; and LAX, Century Boulevard office corridor, El Segundo and other South Bay Cities growth areas to the south of the Village at Playa Vista site. The area to the east of the Village at Playa Vista Project along the Slauson Avenue to Manchester Boulevard corridor all the way to approximately a mile east of the I-110 freeway was also examined for growth. The northern areas showed a growth of approximately 14,000 employees while the growth to the south showed an increase of approximately 30,500 employees. The eastern areas showed a modest growth of approximately 6,000 employees. The

model's distribution of trips, as discussed in Subsection 3.4.4, Section IV.K.(1), Traffic and Circulation, beginning on page 862 of the Draft EIR, are such that the Proposed Project's work-related trips are assigned consistent with these overall growth projections for employment in the area.

Specific assignment of project trips to various travel corridors to the north and south were based on the balancing of trips through these available travel corridors, their residual capacities and travel times associated within these corridors to reach their respective destinations. A technique known as "Wardrup's user optimal principle" that was used in the assignment of trips in the calibrated/validated model ensured that the most reasonable and realistic assignment of trips to various travel corridors occurred in the development of forecasts. The Wardrup's user optimal principle essentially provides that at equilibrium, all possible paths considered (including those "short cuts") between any origin and destination zone will have equal travel times. The result is that the capacity-constrained equilibrium traffic assignment technique takes into account available capacity (or in other words, degree of congestion) in the network while balancing all possible paths to and from an origin and its destination.

Travel corridors available to the north included Lincoln Boulevard, Admiralty Way and Centinela Avenue to the City of Santa Monica and Marina del Rey growth areas; Centinela Avenue, the I-405, Sepulveda Boulevard and Jefferson Boulevard to Overland Avenue and La Cienega Boulevard to Westwood and Century City growth areas. Similarly, travel corridors to the south included Lincoln Boulevard, Culver Boulevard to Pershing Drive/Vista del Mar, Sepulveda Boulevard and the I-405 to the LAX, Century Boulevard, El Segundo and other South Bay Cities growth areas. Again, the assignment of trips to these travel corridors to the north and south were consistent with the key variables that affect path choice as noted above, and their magnitudes were consistent with the land-use/socio-economic growth projections provided by SCAG for the area.



---

## **TOPICAL RESPONSE**

### **TR-3: RELATED PROJECTS**

---

The Village at Playa Vista traffic impact analysis was conducted using a focused transportation model based on the Southern California Association of Governments (SCAG) regional model. Thus, the model included all of the socioeconomic and land use growth anticipated by SCAG in the entire region – not just within the study area. Interpolation between 2000 and 2015 socioeconomic datasets produced land use and traffic growth patterns for the Year 2010 to be used as the Future Cumulative Base projections.

To check the validity of the SCAG projections, each of the cities within the study area was asked to supply a list of their related background projects; i.e., the projects in development or anticipated to be developed by 2010. This resulted in a list of 96 projects, listed and illustrated in Section III.B, Figure 11 on page 194 of the Draft EIR.

Traffic projections were prepared for all 96 of the related projects and the location of every related project was identified with respect to the system of traffic analysis zones within the transportation model. The 2000 to 2010 traffic growth in every traffic analysis zone was compared to the location of the related projects to make sure that sufficient traffic growth was assumed in the each traffic analysis zone of the model to account for recently opened projects as well as every individual related project. For those few zones where sufficient traffic growth did not appear to be included in the SCAG model, traffic from the known related project was added to the model's trip table.

A comparison of traffic counts at intersections within the study area showed an average annual growth of slightly less than one percent per year for the seven year time period between 1995 and 2002. This traffic growth accounted for all of the new projects that opened in the study area and for the growth in traffic volumes caused by land use growth outside of the study area. Based on this historical growth over the last seven year period, traffic growth between the 2003 existing conditions and 2010 Future Base conditions would be expected to be in the range of 6 to 7 percent. Notwithstanding this historical growth rate of approximately 1 percent a year, the model predicts an average traffic growth of 20 to 25 percent for most corridors within the study area for the ten-year period from Year 2000 traffic levels to Year 2010 Future Base conditions based on the SCAG projections and the related projects. The model clearly represents a conservative projection of the possible growth in background traffic. For the purposes of the Draft EIR, the high projection for future background traffic makes it more likely that the project traffic will cause a significant impact since, according to Los Angeles Department of Transportation criteria, it takes a smaller amount of project traffic to create a significant impact

as the background traffic congestion increases. In other words, the more congested the intersection, the lower the threshold to result in a significant impact.

Thus, the model assumptions include not only the known related projects, but projected background traffic growth for projects that might be developed but were not known or identified by the cities at the time of the Draft EIR preparation.

---

**TOPICAL RESPONSE**  
**TR-4: THE VILLAGE AT PLAYA VISTA TRANSIT PLAN EFFECTIVENESS**

---

The transit improvements proposed by the Village at Playa Vista Project consists of providing additional buses to Culver City Bus along heavily traveled north-south corridors including costs to operate and maintain the same. These routes also facilitate coordinated transfers to regional rail lines and other regional bus lines (from other operators including the Los Angeles County Metropolitan Transportation Authority (MTA) and Santa Monica Big Blue Bus Lines) at the Fox Hills Mall Transit Center (located within the Fox Hills Mall along Sepulveda Boulevard) and the West Los Angeles Transit Center (located adjacent to the intersection of Washington Boulevard and Fairfax Avenue). From a planning perspective, these additional buses would supplement the four buses (plus one spare bus) being provided by the Playa Vista First Phase Project to the Santa Monica Big Blue Bus Lines to improve service frequencies along the Lincoln Boulevard bus line between the City of Santa Monica and the transit center at Airport Lot C near LAX.

In order to improve the travel speeds and facilitate on-time performance on the Lincoln Boulevard bus route, transit priority system implementation is being provided along the Lincoln Boulevard corridor. The Transit Priority System (TPS) is the traffic signal component of the MTA's Metro Rapid Program. The TPS system improves bus route travel times and schedule performance by adjusting traffic signalization to provide signal priority for buses along a corridor, based on the real time location of a bus. This means that these buses will experience more green lights and fewer red light delays. The TPS component consists of upgraded signal controllers at signalized intersections, transponder equipment, and other associated bus vehicle identification system components that contribute to a system of real-time signalization control. Therefore, on an overall basis, bus transit along Lincoln Boulevard, Sepulveda Boulevard, Centinela Avenue/Inglewood Boulevard, Washington Boulevard, and Jefferson Boulevard would be enhanced by the Village at Playa Vista Project.

In addition, an intelligent demand responsive Shuttle System to carry Playa Vista residents, workers and area residents to and from nearby key activity centers such as the Village Center, office, studios and residential areas located on-site, Howard Hughes Entertainment Center, Fox Hills Mall Transit Center/Corporate Pointe, the beach and other uses at Marina del Rey and Loyola Marymount University is also being provided. This shuttle would be free of charge for everyone during the peak hours on weekdays and at all times for Playa Vista residents and workers. This shuttle would operate on a fixed route within the project site and adjacent Playa Vista First Phase Project but would respond to specific requests for pick ups and deliveries of individual passengers at selected locations in the adjacent community.

The overall transit and associated improvements proposed would serve the Playa Vista First Phase users, the Village at Playa Vista users and other users in adjacent communities. Residents and employees of the overall Playa Vista site would be able to utilize these improvements.

As detailed in the Technical Appendix K-3 of the Draft EIR, section titled “Appendix Volume 1F – Transit Mitigation Program,” a comprehensive analysis of transit market potential and travel corridor identification was performed. The assessment of transit market potential consisted of estimating the magnitude of person travel along specific congested travel corridors during the peak commute hours of the day. Based on the need for additional or new transit service indicated in the transit market potential analysis, specific transit corridors were identified for improvement. The corridors chosen for improvement were coordinated with the transit provider (Culver City Bus) and included additional buses to various existing bus lines, a new regional bus line from the Playa Vista site along Sepulveda Boulevard to the south, and extension of a bus line along the project frontage to connect with the Fox Hills Mall Transit Center and the West Los Angeles Transit Center.

The Culver City Bus Line 6 (Aviation Boulevard Green Line Station to UCLA Transit Center) ridership data currently shows significant overloading or crowding all along the route north of the site. This route would be greatly enhanced by the provision of the proposed improvements (consisting of additional buses and signal system improvements). The average increase in ridership along this route anticipated in the assessment of mitigation effectiveness for the project translated to a conservative 1 to 1.5 percent transit mode split for the origins and destinations served by this route, compared to the observed regional average of 3.5 percent recommended and used by the Los Angeles County Congestion Management Program (CMP). In other words, this mitigation would be effective with an additional 1.5 percent of the people traveling between the areas served by this route projected to use the bus, which is less than half the regional average of 3.5 percent identified in the CMP. It is also worth noting that an increase of approximately 10,000 employees is anticipated in the Westwood and Century City growth areas by the year 2010, per SCAG’s socio-economic data forecasts, and this line would provide an alternative mode of transportation for these trips as well.

The Regional Bus Line to the south would serve the office corridors along Century Boulevard and the South Bay Cities while providing direct and coordinated transfers and connections to the Metro Green Line. The average increase in ridership anticipated in the assessment of mitigation effectiveness by the provision of this service translated to a conservative 1.3 to 1.7 percent transit mode split for the origins and destinations served by this route, compared to the Los Angeles County CMP average of 3.5 percent. SCAG’s socio-economic forecasts indicate that an increase of approximately 25,000 employees is anticipated by the year 2010 in El Segundo, LAX and Century Boulevard growth areas. This line would offer a direct connection between those growth areas and the Playa Vista site.

Similarly, the Culver City Bus Line 4 benefits used as mitigation by the Village at Playa Vista Draft EIR were less than 1.7 percent. This line will offer connections to and from the Transit Centers at Fox Hills Mall and West Los Angeles. This line serves the Century City and Culver City growth areas and offers an alternative mode of transportation between Playa Vista, Playa del Rey and the Transit Centers.

As an example of how successful transit enhancement project can be, the MTA has instituted a very successful Rapid Bus Program and is planning to implement the Sepulveda Boulevard and Lincoln Boulevard Rapid Bus Lines by the year 2008. The Wilshire Boulevard and Ventura Boulevard lines were utilized as demonstration lines for the Program. Recently, four additional lines including the Vermont Avenue, Florence Avenue, Broadway and Van Nuys Boulevard lines have been put into service. Recent information from the MTA indicates that an average increase in ridership of approximately 20 percent along the Vermont Avenue line has been observed. The Sepulveda Boulevard and Lincoln Boulevard lines, when implemented, would also have similar potential for success.

In summary, 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 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.

---

**TOPICAL RESPONSE**  
**TR-5: NEIGHBORHOOD TRAFFIC IMPACTS**

---

A number of comments raise questions regarding the possibility of neighborhood traffic impacts and the adequacy of the analysis of this issue in the Draft EIR. The commentors raise questions about specific neighborhoods and streets beyond those identified as potentially impacted by the Proposed Project in the Draft EIR, particularly in residential areas of Del Rey, Mar Vista, Venice, and Santa Monica. The comments also question the validity of certain of the assumptions and significance criteria used in the Draft EIR to evaluate neighborhood traffic impacts and request additional analyses, findings of significance, and provision of mitigation in these neighborhoods.

Standard travel demand models such as the focused model used to conduct the traffic analysis in the Draft EIR are calibrated at the major and secondary arterial and collector street level. The Draft EIR undertook a separate analysis to determine the possibility of neighborhood impacts. This neighborhood impact analysis examined criteria under which there could be a significant impact on local streets (see Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872). The criteria used to evaluate potential impacts on neighborhoods were:

- Sufficient congestion, under cumulative conditions including related projects, exists on arterial corridors such that motorists traveling along the arterial corridor may desire to divert to a parallel route through a residential neighborhood: and
- Sufficient additional traffic is projected to be added to the arterial corridor by the Proposed Project such that the volume that may shift to an alternative route could exceed the City's significance threshold level. The City uses a significance level of 120 or more daily trips to determine a significant impact on a local street (see Subsection 3.2.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 833); and
- Availability of local neighborhood street(s) providing a parallel route of travel.

This analysis was undertaken for residential areas within the study area to determine if there was a significant impact on residential areas. See Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872.

The determination of significance in the Draft EIR was predicated on the City's significance criteria for neighborhood street impacts (see Subsection 3.2.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 833). Based on application of these criteria, the Draft EIR concluded that the Proposed Project may have significant neighborhood traffic impacts requiring mitigation on residential streets in four neighborhoods described in the Draft EIR (see Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 876). Mitigation is proposed in the Draft EIR for these direct Proposed Project impacts.

The Draft EIR does acknowledge (see Subsection 6.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 939) that the Proposed Project also has the potential to contribute incrementally to cumulative impacts at local residential streets already experiencing intrusion traffic under cumulative conditions even though the addition of trips caused by the Proposed Project does not exceed LADOT threshold criteria for significance.

In this regard, while the Draft EIR analyzes traffic impacts to residential areas, the Draft EIR establishes a process to address any unforeseen impacts to residential areas. In the event any unforeseen neighborhood traffic intrusion problems are reported to LADOT 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 areas of concern. The Neighborhood Traffic Management Measures would be funded through a DOT-managed account established by the Proposed Project, as discussed further in the LADOT Assessment Letter in Volume XX, Technical Appendix K-1 of the Draft EIR. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Management Plan funded through other means.

---

**TOPICAL RESPONSE**  
**TR-6: RELATIONSHIP WITH COMMUNITY PLAN POLICIES**

---

Questions have been raised regarding the relationship of the transportation impact analysis in the Draft EIR with various policies set forth in the Venice Community Plan and the Palms-Mar Vista-Del Rey Community Plan. The comments make the assertion that the implementation of the Proposed Project may violate various policies as articulated in the specific Community Plans.

First, it should be noted that the Proposed Project is located in the Westchester-Playa del Rey Community Plan area and as such is not within the boundaries of the Palms-Mar Vista-Del Rey Community Plan or the Venice Community Plan. Since the Proposed Project is not in the Palms-Mar Vista-Del Rey Community Plan area or the Venice Community Plan area, it is not subject to the provisions of those plans.

Notwithstanding the fact that the Proposed Project is not part of the Venice or the Palms-Mar Vista-Del Rey Community Plan areas, the following describes the policies of the Venice and Palms-Mar Vista-Del Rey Community Plans and their application to the Proposed Project if they were applicable. As noted above, they are not applicable to the Proposed Project since the Proposed Project is not within either the Venice or Palms-Mar Vista-Del Rey Community Plan area. As worded in the text of the Venice and Palms-Mar Vista-Del Rey Community Plans, the goals and policies referenced in the comments are:

- Goal 14 – “Discourage non-residential traffic flow on residential streets and encourage community involvement in determining neighborhood traffic controls.”
- Goal 16 – “A system of highways, freeways and streets that provide a circulation system which supports existing and planned land uses while maintaining a desired level of service at all intersections.”
- Policy 16-1.1 – “Maintain a satisfactory LOS for streets and highways that should not exceed LOS ‘D’ for Major Highways, Secondary Highways and Collector Streets. If existing levels of service are LOS ‘E’ or LOS ‘F’ on a portion of a highway or collector street, then the level of service for future growth should be maintained at LOS ‘E’ if possible.”
- Policy 16-2.1 – “No increase in density shall be effected by zone change, Plan amendment, subdivision or other discretionary action unless it is determined that the



transportation infrastructure serving the property can accommodate the traffic generated.”<sup>7</sup>

First, with respect to Goal 14, the transportation plan set forth in the Draft EIR mitigates all significant impacts of the Proposed Project on the highway and arterial network. The traffic study analyzes all the residential areas to determine if there is a possibility of any significant project impacts in residential areas. Based on the analysis of the residential areas, four residential areas were identified as having potential significant impacts and a mitigation measure was proposed to provide funding for neighborhood protection measures (see Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872). In addition, while the Draft EIR analyzes traffic impacts to residential areas, a process is also in place to address any unforeseen impacts to residential areas. In the event any unforeseen neighborhood traffic intrusion problems are reported to LADOT 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 areas of concern. The Neighborhood Traffic Management Measures would be funded through a DOT-managed account established by the Proposed Project, as discussed further in the LADOT Assessment Letter in Volume XX, Technical Appendix K-1 of the Draft EIR. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Management Plan funded through other means. The Neighborhood Traffic Management Plan will reduce the impact to a less-than-significant level.

With respect to Goal 16, the highway and street system described in the Draft EIR has a number of significant improvements designed to accommodate existing and planned uses. The Draft EIR describes in detail the planned improvements to the circulation system by the year 2010. See Subsection 3.4.2 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 842 and Section II.15, Corrections and Additions of the Final EIR for a discussion of roadway improvements expected by the year 2010. In addition, the Proposed Project will make significant additions to the circulation system. See Subsection 4.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 887 and Section II.15, Corrections and Additions of the Final EIR for a discussion of the Proposed Project’s mitigation measures. Following completion of the Proposed Project and implementation of the Proposed Project’s mitigation measures, all significant impacts of the Proposed Project will be mitigated to levels of insignificance.

---

<sup>7</sup> *Policy 16-2.1 as worded in the Venice Community Plan. The wording of Policy 16-2.1 in the Palms-Mar Vista-Del Rey Community Plan is slightly different, as follows: “No increase in density shall be effected by zone change or subdivision unless it is determined that the transportation infrastructure serving the property can accommodate the traffic generated.”*

With respect to Policy 16-1.1, it is important to note that projected increases in levels of service are primarily caused by the increase in ambient conditions (existing conditions plus projected growth in population, employment and housing unrelated to the Proposed Project), rather than by the Proposed Project. The Proposed Project would not cause any intersections operating at LOS E to operate at LOS F. Further, after mitigation, the Proposed Project would not add sufficient traffic on any intersections operating at LOS D to result in an LOS E in the City of Los Angeles, with the exception of three intersections that would be operating at the border of LOS D/E. These intersections are La Cienega Boulevard/La Tijera Boulevard (V/C of .898 in 2010 base and .904 after mitigation), Lincoln Boulevard/Maxella (V/C of .897 in 2010 base and .901 after mitigation) and Main Street/Rose Avenue (V/C of .900 in 2010 base and .903 after mitigation). As noted above, the implementation of the proposed mitigation measures mitigates all of the Proposed Project's traffic impacts to a level of insignificance.

Finally, with regard to Policy 16-2.1, the Proposed Project will provide significant enhancements to the transportation system. These include roadway corridor and intersection improvements, signal system improvements, external transit system improvements, internal and expanded intelligent shuttle system improvements, and bicycle system improvements. As noted, the implementation of the proposed mitigation measures will mitigate all significant impacts of the Proposed Project.

---

**TOPICAL RESPONSE**  
**TR-7: STUDY INTERSECTIONS**

---

A number of comments suggested analysis of additional intersections not expressly noted in the discussion of the Draft EIR.

**Method of Selection of Intersections Studied in Draft EIR**

The Traffic Study included in the Draft EIR Technical Appendix K-2, Volume XX used a systematic process in selecting intersections for evaluation. This process is described in detail in the Draft EIR, Section IV.K.(1), Traffic and Circulation, beginning on page 828 as well as in the Technical Appendix referenced above. As described therein, the approximately 100-square mile study area was established by reviewing the travel patterns and the potential traffic impacts of Proposed Project traffic. Within the study area, 218 intersections were selected for detailed study in the following three steps:

1. The 105 intersections from the Playa Vista First Phase Project EIR were included.
2. Adjacent and nearby cities and jurisdictions were given the opportunity to add additional intersections to the study list. These included the Cities of Santa Monica, Culver City, Inglewood, El Segundo, Manhattan Beach, Hawthorne, Hermosa Beach, and the County of Los Angeles.
3. Additional intersections were added after the results of the modeled traffic assignments were investigated so that all locations where Project traffic might have a significant impact were included.

**Suggested Intersections Along Lincoln Boulevard Corridor**

Some commentors suggested analysis of additional intersections along the Lincoln Boulevard corridor in Venice and Santa Monica. Specific suggestions were made for analysis of the intersections of Lincoln Boulevard with California Avenue, Sunset Avenue, Marine Street, and Ashland Avenue, and more general suggestions were made for analysis of all signaled or major intersections along Lincoln Boulevard between Jefferson Boulevard and I-10.

The Draft EIR specifically evaluated all signalized intersections along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard (Lincoln Boulevard at Jefferson Boulevard, Fiji Way, Mindanao Way, SR 90, Maxella Avenue, Washington Boulevard, and Venice

Boulevard). In addition, the Draft EIR evaluated all intersections of Lincoln Boulevard with arterial cross-streets north of Venice Boulevard to I-10 (Lincoln Boulevard at Rose Avenue, Ocean Park Boulevard, Pico Boulevard, I-10 eastbound ramps, and I-10 westbound ramps) plus the intersection of Lincoln Boulevard with Wilshire Boulevard further to the north (see Figure 65 in Subsection 2.2.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 809). The other intersections suggested by commentors along Lincoln Boulevard between Venice Boulevard and I-10 would be with collector or local cross-streets.

The Draft EIR determined that the project may have significant traffic impacts before mitigation at the intersections of Lincoln Boulevard with Jefferson Boulevard, Fiji Way, Mindanao Way, SR 90, Maxella Avenue, Washington Boulevard, and Venice Boulevard, but did not find any potential significant impacts before mitigation at any of the analyzed intersections north of Venice Boulevard (see Figure 74 in Subsection 3.4.5 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 867).

Review of the incremental project impacts at the study intersections along Lincoln Boulevard (from Table 119 in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 847) indicates that V/C increases of 0.013 and 0.011 are projected at Lincoln Boulevard/Venice Boulevard during the A.M. and P.M. peak hours, respectively, just above the LADOT threshold criteria for significance of 0.010 at LOS E or F. At Lincoln Boulevard/Rose Avenue, the project V/C increases are 0.009 and 0.008, respectively, below the LADOT criteria for significance at LOS E or F. The project V/C increases decrease even further north, to no greater than 0.004 at Lincoln Boulevard/Ocean Park Boulevard and the other analyzed intersections in Santa Monica. These levels are below the threshold of significance. Review of the incremental project-added trips along Lincoln Boulevard (see Figures 4-5 and 4-6 in Technical Appendix K-2 of the Draft EIR beginning on page IV-7a) indicates that the project trips decrease the further from the project site as trips disperse to other corridors and to land uses within the study area. For example, south of Venice Boulevard, the project is projected to add 88 and 102 trips to Lincoln Boulevard south of Venice Boulevard during the A.M. and P.M. peak hours, respectively, but this would decrease to only 50 and 64 trips north of Venice Boulevard and less than 50 trips north of Rose Avenue. More importantly, the incremental impact of project traffic on an intersection is determined by the maximum project traffic added in the peak direction of travel. In order for a project to create a significant impact at a minor cross-street intersection (i.e., at local and collector streets) that is operating at level of service E or F, the project must add more than 17 trips per lane in total to the peak directions of travel at the intersection. If a project adds less than 17 trips per lane, it will not increase the intersection volume/capacity ratio enough to create a significant impact. If the intersection is operating at a better level of service, the amount of traffic that can be added to the intersection before it creates a significant impact is increased. In the case of the Proposed Project, as shown in Figures 4-5 and 4-6 (on pages IV-7a and IV-7f of Technical Appendix K-2), the project trip incremental additions north of Venice Boulevard are all less than 34 vehicles (i.e., less than 17 vehicles per

lane) in the peak directions. Therefore, the project traffic levels added to the Lincoln Boulevard corridor north of Venice Boulevard do not create a significant impact.

Given the decrease in project trips north of Venice Boulevard, the small incremental level of project impact at Lincoln Boulevard/Rose Avenue and other arterial study intersections along the corridor north of Venice Boulevard, and the lower level of cross-street traffic on collectors and locals than on arterials, the Proposed Project would not have significant impacts at intersections with collector or local streets along the corridor north of Venice Boulevard. The signalized intersections described in the comments are all collector or local streets with lower traffic levels on the streets intersecting Lincoln Boulevard. Again, the arterial/arterial intersections control the operation of the corridor and these are the most critical locations.

### **Additional Suggested Intersections in Santa Monica**

Numerous commentors suggested analysis of additional intersections in the City of Santa Monica (in addition to those discussed above along the Lincoln Boulevard corridor in Santa Monica). Specific suggestions were made for analysis of the following intersections:

- Main Street & Olympic Drive
- 4th Street & I-10 eastbound on-ramp
- 4th Street & I-10 westbound off-ramp
- 7th Street & San Vicente Boulevard
- 7th Street & Wilshire Boulevard
- 14th Street & Wilshire Boulevard
- 20th Street & Wilshire Boulevard

The Draft EIR evaluated numerous intersections within Santa Monica that are closer to the project site than the suggested intersections, including Main Street/Ocean Park Boulevard, Main Street/Pico Boulevard, 4th Street/Ocean Park Boulevard, 4th Street/Pico Boulevard, Lincoln Boulevard/Ocean Park Boulevard, Lincoln Boulevard/Pico Boulevard, Lincoln Boulevard/I-10 eastbound ramps, Lincoln Boulevard/I-10 westbound ramps, Lincoln Boulevard/Wilshire Boulevard, Cloverfield Boulevard/Ocean Park Boulevard, 23rd Street/Walgrove Avenue/Ocean Park Boulevard, 23rd Street/Pico Boulevard, Cloverfield Boulevard/Pico Boulevard, Cloverfield Boulevard/I-10 eastbound ramp, Cloverfield Boulevard/I-10

westbound ramp, 26th Street/Wilshire Boulevard (see Figure 65 in Subsection 2.2.3 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 809).

The Draft EIR determined that the project would not have significant traffic impacts at any of these intersections (see Figure 74 in Subsection 3.4.5 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 867).

Review of the incremental project impacts at the study intersections in Santa Monica (from Table 119 in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 847, and from Table 9-3 in Section II.37, Corrections and Additions, of the Final EIR) indicates that V/C increases of no greater than 0.004 are projected at any of these intersections during the A.M. and P.M. peak hours, which is below the LADOT threshold criteria for significance of 0.010 at LOS E or F and the City of Santa Monica threshold criteria for significance of 0.005 at LOS E or F. Because intersections farther away from the studied intersections would experience the same or less project traffic, it is clear that these intersections would not be significantly impacted.

### **Additional Intersections Suggested for Study**

Other comments suggested additional intersections for study along the Abbott Kinney Boulevard, Walgrove Avenue, and Beethoven Street corridors, plus the intersections of Inglewood Boulevard/Venice Boulevard, Sawtelle Boulevard/National Boulevard, Palms Boulevard/Kelton Avenue, and Gateway Boulevard/Pico Boulevard. An analysis of these locations showed much the same conclusions as the Lincoln Boulevard discussion above.

Referring to Figures 4-5 and 4-6 (pages IV-7a to IV-7j in Technical Appendix K-2), the project is projected to add much less than 17 vehicles per hour per direction in the Abbott Kinney corridor (maximum of 8 A.M. peak-hour trips and 11 P.M. peak-hour trips). Therefore, with added volumes below the impact threshold, no significant impacts would occur at the intervening intersections.

The project would add much less than 17 vehicles per hour per direction in the Walgrove and Beethoven corridors (maximum of 7 A.M. peak-hour trips and 6 P.M. peak-hour trips in the Walgrove corridor and maximum of 2 A.M. peak-hour trips and 4 P.M. peak-hour trips in the Beethoven corridor) (see Figures 4-5 and 4-6, on pages IV-7a to IV-7j, in Technical Appendix K-2). Therefore, with added volumes below the impact threshold, the project would not create a significant at intersections along these corridors.

Similarly, in the case of requests for the Inglewood Boulevard/Venice Boulevard, Sawtelle Boulevard /National Boulevard, Palms Boulevard /Kelton Avenue, and Gateway

Boulevard /Pico Boulevard intersections, the project traffic volumes are far below the levels that would generate a significant impact (17 vehicles per lane per hour in the peak direction) as shown in Figures 4-5 and 4-6 of Technical Appendix K-2. The Project would, therefore, not create a significant impact at these locations. These conclusions are unchanged under both baseline scenarios (i.e., with and without Playa Vista Drive bridge and road).

---

**TOPICAL RESPONSE**  
**TR-8: SIGNIFICANT IMPACTS MAY REMAIN**

---

The Draft EIR proposes transportation mitigation measures in Section IV.K.(1), Traffic and Circulation. Some commentors expressed concern that the Draft EIR states that if certain transportation mitigation measures are determined to be infeasible or if the necessary approvals cannot be obtained, then a significant impact may remain. The Draft EIR states the following in Section IV.K.(1), Traffic and Circulation on page 887:

“All traffic mitigation measures within the City shall be completed to the satisfaction of LADOT. If any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible, or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain.

All traffic mitigation measure improvements within the responsibility and jurisdiction of the public agencies other than the City of Los Angeles shall be monitored through LADOT and implemented to the extent feasible. If improvements within the responsibility and jurisdiction of public agencies other than the City of Los Angeles (i.e. County of Los Angeles, City of Culver City, City of Inglewood, Caltrans, Coastal Commission, etc.) cannot be implemented, significant traffic impacts may remain at such locations.”

While none of the proposed measures are anticipated to be infeasible, it is possible that there may be occasions where mitigation measures may later become infeasible. In the event a mitigation measure is infeasible, a significant impact may remain. The purpose of the quoted statements above is to inform the reader and the decision-makers of this possibility. In certifying the EIR, the decision maker may chose to override, based on other considerations for public benefit, such as jobs, housing and employment, the potential significant impact that could occur in the event a measure is determined to be infeasible in the future. The foregoing notwithstanding, all mitigation measures will be required of the Proposed Project.

Further, some of the transportation mitigation measures proposed in the Draft EIR are located outside of the lead agency’s jurisdiction. These mitigation measures and the jurisdiction(s) where they are located are discussed in Section IV.K.(1), Traffic and Circulation and summarized in Table 129, beginning on page 891 and Section II.15, Corrections and Additions, of the Final EIR. The lead agency (i.e., the City of Los Angeles) does not have the ultimate authority to impose the mitigation measure(s) on another entity that has jurisdiction over the location where the applicable mitigation measure is proposed. Thus, there is a possibility



that a significant impact would remain in the event a mitigation measure was not implemented in another jurisdiction. Nonetheless, all of the proposed mitigation measures have been analyzed and determined to provide effective mitigation if implemented. Where mitigation measures are located outside of the lead agency's jurisdiction, the lead agency is recommending that the proposed mitigation measure be implemented by the agency with jurisdiction.

As discussed on page 890 of the Draft EIR, substitute mitigation measures may be proposed in the event any traffic mitigation measure is determined to be infeasible provided the substitute measure is equivalent to, or superior to the original mitigation measure. As with an original mitigation measure, the lead agency would not have the authority to impose a substitute mitigation measure in another jurisdiction. The Draft EIR states on page 890 that if any such substitute measure is located in an outside jurisdiction, the substitute measure "must be approved by the agency with jurisdiction over the location of the measure." Section IV.K.(1), Traffic and Circulation, of the Draft EIR, further informs the reader and the decision-makers that if such a substitute measure is not approved by the entity with jurisdiction, a significant impact may remain.

The inclusion of the quoted sections above does not indicate that any of the proposed mitigation measures are not believed to be feasible or have not been evaluated. On the contrary, the Draft EIR provides a detailed analysis of these mitigation measures in Section IV.K(1), Traffic and Circulation, and in Appendix K to the Draft EIR. The technical feasibility of all physical mitigation measures have been established through a detailed process including field visits and conceptual engineering evaluation. Conceptual design drawings for the proposed mitigation measures are included in the Draft EIR, Appendix K-1, Attachment G, and in Appendix K-6. These exhibits have been reviewed and conceptually approved by the City of Los Angeles Department of Transportation. Further, the Draft EIR has been provided to all of the entities with jurisdiction over these proposed mitigation measures. As noted above, none of the proposed measures are anticipated to be infeasible; however, the City of Culver City has requested that alternative mitigation measures be considered for several proposed improvements within their jurisdiction.

---

**TOPICAL RESPONSE**  
**TR-9: TRAFFIC: FIRST PHASE PROJECT (VTTM 49104) CONDITION NO. 116**

---

Some commentors state that the Proposed Project should not be approved until the Playa Vista First Phase Project is completed so that traffic impacts from the First Phase Project are known. Consideration of the Proposed Project is not required to be delayed until the First Phase Playa Vista Project is completed and occupied. The Draft EIR takes into account development of the Playa Vista First Phase Project as part of the 2010 baseline condition. Thus, the Proposed Project's impacts incorporate traffic growth resulting from the Playa Vista First Phase Project, as well as anticipated growth in the area.

The transportation model used in the Draft EIR to assess potential traffic impacts was developed based on a nationally recognized model, as discussed further in Topical Response TR-1, Playa Vista Transportation Model, on page 447. The model was calibrated taking into account SCAG regional projections and a list of 96 related projects provided by jurisdictions within the study area.

In addition, some commentors have suggested that the conditions of approval for the Playa Vista First Phase Project, as approved by the City, include a condition that requires the City to deny the Proposed Project until the existing approved Playa Vista First Phase Project is built out or, alternatively prohibits the City from approving the Proposed Project until the Playa Vista First Phase Project is fully built out. The conditions of approval for the Playa Vista First Phase Project do not contain such a condition.

Condition No. 116 of the City approved Vesting Tentative Tract Map no. 49104 for the adjacent Playa Vista First Phase Project provides that "The maximum average number of P.M. peak hour off-site automobile trips generated by the cumulative total of First Phase office space shall be limited to 1,493." In addition, this condition states that "The failure to achieve the [Playa Vista First Phase Project] trip reduction goal will result in a corresponding decrease in total office entitlement for the Playa Vista Master Plan Project as a whole." The effect of Condition No. 116 is that the amount of office permitted in the Playa Vista Master Plan *as a whole* would be reduced if the off-site trips from the First Phase Project exceed 1,493 trips in the P.M. peak.

First, the Playa Vista First Phase Project has not exceeded the maximum average number of P.M. peak-hour off-site automobile trips in office space, particularly since the office component of the First Phase has not yet been built out. More importantly, a reduction in the amount of office space within the Playa Vista Master Plan as a whole has, in effect, already been

achieved with the sale by Playa Vista of Areas A, B, and C to the State of California. With respect to office entitlements, which are the only entitlements limited in the previously approved Condition No. 116, the Playa Vista Master Plan Draft Program EIR envisioned 5,280,000 sq.ft. of office entitlements. The First Phase Project (3,206,950 sq.ft. of office space) and the Proposed Project (175,000 sq.ft. of office space) total 3,381,950 sq.ft. of office entitlements. This represents a 36 percent reduction of the total office entitlements envisioned in the Playa Vista Master Plan Draft Program EIR. This reduction was achieved when a significant portion of the office component was eliminated at the time Areas A, B, and C were removed from the overall Playa Vista Master Plan in connection with the sale/transfer to the state.

Nothing in Condition No. 116 prohibits proceeding with future entitlements until the entire First Phase office project is completed. The office entitlements within the Playa Vista Master Plan, as a whole, have already been reduced by 36 percent (equivalent to a reduction of approximately 2200 off-site P.M. peak-hour trips) from what was envisioned in the Master Project as a whole. Given this reduction from the Master Plan, the First Phase Project office uses would need to generate trips that more than double its trip cap, or 3,700 off-site P.M. peak-hour trips, before any reduction in the proposed Village at Playa Vista office uses would be required. Based on the Institute of Transportation Engineers (ITE) office trip generation rates accepted and used by transportation planning agencies and organizations, including the City of Los Angeles, such an increase is not anticipated to occur.

---

**TOPICAL RESPONSE**  
**TR-10: ALTERNATIVE 2010 BASELINE SCENARIO – ADDITIONAL MITIGATION MEASURE**

---

As discussed in Section II.D on page 179 of the DEIR, Area A and a portion of Area B was the subject of an Option Agreement between Trust for Public Land and the Applicant for sale to the State of California. The State of California completed the acquisition of these areas in December 2003. In addition, the Applicant is no longer under an obligation to plan and entitle Area C, which is owned by U.S. Trust Company for the benefit of the State of California, and Area C is no longer included with the Planning Area for Playa Vista. Area C is currently scheduled for transfer to the State of California.

Pursuant to agreements with the State, the State required that an extension of Playa Vista Drive across the Ballona Channel and across Area C to intersect with Culver Boulevard not be constructed. The State required the deletion of the Playa Vista Drive bridge and road in order to maintain the integrity of Area C for open space. The Applicant relinquished its rights to construct the Playa Vista Drive bridge and road in connection with the sale to the State.

In connection with the acquisition of Areas A and B and the relinquishment of rights over Area C, the State Legislature passed SB 666. SB 666 provides, among other things, that construction of the Playa Vista Drive bridge and road is inconsistent with the State's interest in the preservation of the Area C property and therefore future construction of the Bridge is not required. As a result of the relinquishment of the rights to build the Playa Vista Drive bridge and road and the passage of SB 666, the Playa Vista Drive Bridge and road extension to Culver Boulevard will not be a part of the transportation system and is no longer part of the baseline conditions for the year 2010.

An analysis of a “No Playa Vista Drive road and bridge over the Ballona Channel” was included within the Draft EIR. As discussed in the Draft EIR, the Proposed Project’s potential impacts as well as the effectiveness of the proposed mitigation measures were evaluated under two possible scenarios: first, that the Playa Vista road and bridge was constructed, and a second scenario where the road and bridge was not constructed.

As discussed in Subsections 5.1.2 and 5.1.5, Section IV.K.(1), Traffic and Circulation, on pages 907 and 931, respectively, the Draft EIR identified one remaining significant impact at the intersection of Centinela and Jefferson, which would exist after mitigation under either of the two baseline scenarios discussed above. However, LADOT has identified an additional mitigation measure that would reduce this significant impact at Centinela and Jefferson to a less

than significant level. The additional measure would require the Applicant to provide full public vehicular access through Campus Center Drive (between Bluff Creek Drive and Millennium) which is currently planned to be a restricted access street and would not require public access. The Applicant has agreed to implement this additional measure.

An updated analysis was prepared in order to analyze the new proposed mitigation measure described above. As discussed in Section II.15, Corrections and Additions, of the Final EIR on page 208, with the new mitigation measure, the impact at Jefferson and Centinela would be mitigated to a less than significant level. As such, with the implementation of the mitigation program identified in the Draft EIR and the new additional mitigation measure described above, the Proposed Project will not result in any significant traffic impacts at any location.

Further, implementation of this additional mitigation measure will not create any new significant impacts. Development of the Proposed Project, based on the 2010 “No Playa Vista Drive Bridge and Road” Baseline Scenario and the new traffic mitigation measure identified in the Final EIR, would result in the shifting of a limited number of vehicle trips in proximity of the Jefferson Boulevard and Centinela Avenue intersection. Even though vehicle trips are shifting, the total number of vehicles traveling on area roadways would remain the same.

New analyses of potential air quality, noise and traffic impacts were prepared to confirm that there would be no new significant impacts under the “No Playa Vista Drive Bridge and Road” scenario with the addition of the new mitigation measure. Additional analyses relative to these three environmental issues have been incorporated into Sections II.4, II.8, and II.15, Corrections and Additions, on pages 180, 190 and 229, as well as the Appendices of the Final EIR. As discussed in those sections, there would be no new significant impacts under this scenario, inclusive of the new mitigation measure. Further, because the changes are limited to a redistribution of vehicle trips among a few roadway segments, there would be no changes to the physical environment other than those discussed above that would alter any other environmental impacts attributable to the Proposed Project, as identified in the Draft EIR.

---

**TOPICAL RESPONSE**  
**TR-11: GRADING, EROSION CONTROL AND VEGETATION MAINTENANCE**  
**ACTIVITY IN THE PROJECT AREA**

---

Under CEQA, the baseline for the evaluation of potential environmental impacts is established normally at the time the lead agency issues the Notice of Preparation (NOP) for a proposed project. Cal. Code Regs., tit. 14, § 15125. The City issued the NOP for the Proposed Project on November 14, 2002. Section III.A, Overview of Environmental Setting, of the Draft EIR discusses the environmental baseline at that time.

Some commentors expressed concern regarding activities taking place on the Proposed Project site. The Draft EIR addresses these activities in Subsection 2.2 of Section IV.D, Biotic Resources, on pages 526-527. Subsection 2.2 provides:

Currently, the Project site is used on an ongoing basis to stockpile soil and crushed rock, provide a recycling site for construction materials, stage construction equipment, materials and personnel, and provide for temporary stormwater detention. These activities are allowed under permits issued, or plans approved, by the City of Los Angeles (City), Corps, and CDFG. Site conditions change over time as a result of these permitted activities, as stockpiled materials are transported, equipment, material and personnel are staged in different areas, stormwater detention areas are modified, and general site maintenance activities are conducted. Therefore, the biological resources described in this report represent a “snapshot” characterizing the site at a point in time, and will be subject to ongoing change due to ongoing permitted maintenance, construction staging, and stormwater detention activities on the Project site.

The commentors further stated the City should not allow these activities to take place after the issuance of the NOP and during its environmental review for the Proposed Project. There is no legal precedent to support the contention that CEQA prevents a property owner from using its property during CEQA review for a proposed project on that property, especially when those activities, as is the case with the Proposed Project, have been previously authorized by valid permits. Further, as discussed below, many of these activities have been taking place within the Proposed Project site for more than a decade, long before the City’s issuance of the NOP.

In September 1993, the City certified the First Phase Environmental Impact Report (“First Phase EIR”) for the Playa Vista First Phase Project. As approved, Vesting Tentative

Tract 49104 consisted of the “entirety of Playa Vista Area D, containing 433.4 acres.” See p. 62, Vesting Tentative Tract Conditions, Tract 49104 “Conditions of Approval.” Technical appendices in the First Phase EIR included discussions of existing conditions and construction impacts over the entire 1,087-acre Playa Vista site. Among other issues, the First Phase EIR and responses to comments addressed the presence and development of stockpiles and the development of temporary detention basins in Area D to support the construction of the First Phase Project.

Prior to the start of First Phase Project construction in 1996, the 1,087-acre Playa Vista site had been developed or disturbed extensively. Over the last two centuries, the Playa Vista site has been used for cattle grazing, farming, aircraft manufacturing, an airport, offices, and stockpiling of various materials. Over 3,000 people worked on Area D of Playa Vista when the Howard Hughes facility was at full production.

Since at least 1987, the City of Los Angeles Department of Building and Safety has issued over ten grading permits and almost 30 stockpile modifications to allow over 2,000,000 cubic yards of stockpiling of construction dirt in the Proposed Project site to support construction activity for the First Phase Project in other portions of Area D. As indicated in historical photographs of Area D, (contained in Building and Safety Commissioners File No. 030128, which is included in the Project’s reference library) by 1994, a huge stockpile, in part composed of dirt from construction excavations at Loyola Marymount University, covered the northern half of the Proposed Project area

As contemplated by the First Phase EIR, as construction progresses on the First Phase Project residential area, the Proposed Project site has been utilized increasingly to support First Phase construction activities. In particular, as excavations take place for the construction of subterranean structures, such as parking garages, temporary stockpiles have been created in the Proposed Project site to store the excavated construction dirt. Furthermore, as part of the First Phase Project, the western portion of the Centinela ditch was filled pursuant to previously approved local, state and federal permits, which historically carried stormwater runoff from Area D and the Westchester Bluffs into Area B. As a result, stormwater runoff from the middle and eastern thirds of Area D and the Westchester Bluffs currently has no mechanism to flow into the Freshwater Marsh. As contemplated by the First Phase EIR, the Department of Public Works approves an annual erosion control plan for all of Area D. For at least the last three years, this plan has required the Applicant to construct temporary detention basins in the Proposed Project site to gather stormwater and allow sediments to settle out prior to pumping this water through the Central Drain to the Freshwater Marsh.

In July 2003, the City’s Board of Building and Safety Commissioners denied an appeal filed by opponents of the Proposed Project of a number of grading permits for stockpiles and temporary detention basins in the Proposed Project site. See City of Los Angeles Board of

Building and Safety Commissioners File No. 030128, which is incorporated herein by reference and included in the reference library for the Final EIR. This file includes information provided by Ballona Wetlands Land Trust, the Applicant and City staff as well as the proceedings of the Board of Building and Safety Commissioners. Ballona Wetlands Land Trust has since filed a court challenge against the City and the Applicant regarding these permits. The challenge has not yet been resolved. An outcome either for or against the petitioner is not likely to affect the Proposed Project. In a comment offered by James Henrickson (Comment 30-20) on behalf of Ballona Wetlands Land Trust, Dr. Henrickson agrees that “[t]he vegetation of Area D-2 has been completely removed by grading including both the upland and wetland habitats.” Dr. Henrickson also states that “Area D has been modified by human activity for a long time.” Thus, an order requiring the Applicant to restore the area of the challenged stockpile and temporary detention basin to conditions before construction of the basin and the stockpile would merely clear the Proposed Project site for development.

Rather than simply describing the environmental baseline as static as of the date of the issuance of the NOP, the Draft EIR appropriately describes the ongoing use of the Project site and the resulting dynamic conditions. If the commentors are suggesting that all the studies and analyses must be conducted on a single day (i.e., the day the NOP is issued) that is neither feasible nor practicable. Dozens of experts and consultants have been involved in assessing the environmental conditions of the Project site. An assessment of the dynamic nature of the Proposed Project site as of the Notice of Preparation is provided.



---

**TOPICAL RESPONSE**  
**TR-12: SOIL GAS**

---

As discussed in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, extensive soil gas surveys, and related studies, have been completed within the Proposed Project site and the adjacent Playa Vista First Phase Project site. These studies have included evaluations of the source, nature, migration, extent, risks and mitigation of methane, hydrogen sulfide, and BTEX (benzene, toluene, ethyl benzene, and xylenes) in soil gas.

**A. METHANE GAS**

Methane gas is a commonly occurring gas in oil producing areas, such as Southern California. As discussed in Section 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, pages 700-716, from 1999 through 2000, an initial comprehensive soil gas survey of the Playa Vista First Phase Project site and portions of the Proposed Project site was designed and completed by Exploration Technologies Inc. (ETI), the independent peer reviewer of the City's Department of Building and Safety (LADBS). The investigation consisted of 812 sample locations placed on a 100-foot staggered grid over the Playa Vista site, including 12 sample locations within the Proposed Project Site, in which the soil gas composition was characterized. Subsequently, 214 additional locations were sampled in the Proposed Project site. The protocol for these additional investigations of the Proposed Project site, including the extent of and procedures for sampling, were developed in consultation with and approved by LADBS and ETI. The sampling locations, procedures and resulting data from these assessments are reported in Appendices J-7 to J-9.

As explained in Subsection 2.2.4.1.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, starting on page 700, methane is a flammable and non-toxic gas. Methane is flammable at concentrations in the air between 5 percent (the Lower Explosive Limit (LEL)), or 50,000 parts per million by volume (ppmv), and 15 percent (the Upper Explosive Limit (UEL)), or 150,000 ppmv. As reported in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, pages 707-716, and Appendices J-4 to J-10 and J-14 to J-15, very low methane concentrations were detected in soil gas in the Proposed Project site. The soil gas data is collected from the subsurface, not ambient air or the breathing zone. Concentrations of soil gases in the subsurface dissipate rapidly when exposed to ambient air. Approximately 70 percent of the locations sampled within the Proposed Project site had methane at concentrations less than 100 ppmv. Only 19 of the 226 samples collected within the Proposed Project site detected methane at concentrations greater than 12,500 ppmv, or one-fourth of the

LEL. Figure 58 on page 708 of the Draft EIR depicts the methane concentrations detected in the western portion of the adjacent Playa Vista First Phase Project site and the western edge of the Proposed Project Site. Figure 59 on page 716 of the Draft EIR depicts the methane concentrations detected in the Proposed Project site.

As described in Subsection 2.2.4.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 707 and 710, and Appendix J-4 to J-10 and documents in the reference library, the methane concentrations detected at the Proposed Project site and the Playa Vista First Phase Project site are mainly comprised of thermogenic methane that is believed to be sourced primarily from natural gas sands located within the Pico Formation approximately 500 to 3,400 feet below the surface. As a general principal of gas migration in gas/liquid systems, the primary means of gas transport results from the effects of buoyancy, which is driven by the difference in density between the gas and the liquids. The gas migrates vertically up toward the surface under buoyant forces as gas bubbles through permeable strata or small micro-fissures in the soil layers. Only minimal, very localized, lateral migration of the gas occurs as it encounters soils of overlying low permeability and/or follows permeable strata or micro-fissures that have limited lateral alignments. Capping by building improvements at the surface is not expected to have a meaningful impact on lateral gas migration, or gas flux, since shallow soil gas will be collected and vented through the methane mitigation systems near the surface. Migration of methane and other gases to adjacent communities, as a result of the proposed development activities within the Proposed Project site and the adjacent Playa Vista First Phase Project site, is not expected.

As described in Subsection 2.2.1.2.2 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on page 677, and in Appendices J-4 to J-6, and documents in the reference library, in April through September 2000, Exploration Technologies Inc., Camp, Dresser & McKee, and Zymax Forensics conducted independent sampling of soil gas within the adjacent Playa Vista First Phase Project and Proposed Project sites. The consultants reviewing the laboratory analyses of these samples concluded that the methane detected at the surface within the Proposed Project site and the adjacent Playa Vista First Phase Project site does not originate from the Southern California Gas Company storage reservoir. This conclusion also was reached in the City of Los Angeles Office of the Chief Legislative Analyst Report investigating soil gas issues at the adjacent Playa Vista First Phase Project site (see Subsection 2.2.4, of Section IV.I, Safety/Risk of Upset, of the Draft EIR).

The methane studies described in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, and reported in Appendices J-4 to J-10 and J-15, provide a baseline of soil gas data. In addition to these baseline assessments, as described in Subsections 2.1.3.3 and 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 669-670 and 738-739, respectively, and Appendix J-14, additional soil gas studies will be required by the Department of Building and Safety of prospective builders prior to issuance of individual building permits.

Data from these investigations will be used to define appropriate mitigation measures for a particular building. In addition, as described in Appendix J-14 of the Draft EIR, methane gas concentrations within buildings will be monitored. "In the event concentrations of methane gas in the 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 a qualified engineer to investigate, recommend and implement mitigating measures. Such measures shall be subject to approval of the Building and Safety Department and the Fire Department" (see Appendix J-14, page 6).

## **B. HYDROGEN SULFIDE GAS**

As described in detail in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset of the Draft EIR, on pages 700-716, and in Appendices J-4 to J-10 and J-15, the soil gas studies included sampling and analyses for hydrogen sulfide. The methods and instrumentation for sampling and analyzing hydrogen sulfide are described in the soil gas monitoring reports in Appendix J of the Draft EIR. The Jerome 631-X hydrogen sulfide analyzer detects concentrations in the range of 0.003 to 50 ppmv with a precision of 5 percent relative standard deviation. The instrument uses a patented gold film sensor that is designed to detect hydrogen sulfide, which eliminates most interferences from other gases, and is commonly used in the oil and gas industry. The method and instrument was proposed by independent peer reviewer Exploration Technologies Inc., and approved by LADBS.

The 226 soil gas samples collected at the Proposed Project site, discussed above, were also analyzed for hydrogen sulfide. The majority of the samples (approximately 67 percent) did not exceed the detection limit of 0.003 ppmv for hydrogen sulfide. The highest concentration of hydrogen sulfide detected was above the upper detection limit of the instrument (>50 ppmv) and occurred at Location 9735 on November 17, 2000 (see Appendix J-8 of the Draft EIR). During the subsequent December 2000 soil gas survey, additional samples were taken at and around Location 9735 and hydrogen sulfide levels were found to be less than 0.03 ppmv at all of the newly sampled locations and below the detection limit (0.003 ppmv) at Location 9735. Additionally, none of the other nearby (i.e., within 100 feet) locations on the November 17, 2000, survey exhibited high levels of hydrogen sulfide. Given these data and the hundreds of samples collected across the site, the initial detection at Location 9735 may have been anomalous (i.e., a very temporary localized condition) with all other samples across the site and conflicts with the re-sampling measurements and the near vicinity measurements. The next highest concentration detected was 1.000 ppmv at a location in the southwest portion of the Proposed Project site. ETI found that hydrogen sulfide encountered during the soil gas surveys is indicative of background levels naturally occurring from recent sedimentary deposits. Such deposits consist of naturally occurring organic-rich material.

As described in Subsection 2.2.4.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on page 709, the soil gas surveys conducted for the adjacent Playa Vista First Phase Project site, as well as those for the Proposed Project site, provide the most reliable, comprehensive, and representative data for defining the overall hydrogen sulfide characteristics of the adjacent Playa Vista First Phase Project and Proposed Project sites. Other data sources, such as boring logs and construction safety field monitoring logs, provide anecdotal evidence of the presence of hydrogen sulfide. Boring logs and other subsurface investigation reports completed for portions of the adjacent Playa Vista First Phase Project and Proposed Project sites include mention of sulfurous odors, potentially hydrogen sulfide. Construction safety field monitoring logs indicate occasional hydrogen sulfide concentrations greater than those noted above. These potential occurrences of hydrogen sulfide are temporary conditions that are addressed during subsurface construction activities. At the surface, hydrogen sulfide dissipates quickly in the atmosphere. As described in Subsections 3.3 and 3.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 721-733, Cal/OSHA worker safety requirements anticipate, and specify worker protection measures for, such occurrences. Existing site health and safety procedures and risk management protocols will protect construction workers and maintenance workers against such exposures. Given the low concentrations of hydrogen sulfide detected within the Proposed Project site and the planned land uses and development activities, no significant exposure of occupants to hydrogen sulfide is expected.

### **C. BENZENE, TOLUENE, ETHYL BENZENE, AND XYLENES (BTEX) GASES**

The soil gas surveys, described above and in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 700-716, and in Appendices J-4 to J-10 and J-15, included analyses of the soil gas for BTEX. Approximately 70 percent of over 200 locations sampled within the Proposed Project site did not detect any of the four BTEX constituents, based on a standard laboratory detection limit of 0.07 ppmv. The majority of sampling locations within the Playa Vista First Phase Project site also did not detect BTEX based on a detection limit of 0.07 ppmv. Only about 25 percent of over 800 sampling locations in the initial soil gas survey of the Playa Vista First Phase Project site and the Proposed Project site detected any concentrations of BTEX. ETI concluded that there are generally very low levels of BTEX contained in the soil gas, with essentially no benzene and only modest levels of toluene and total xylenes within the detected BTEX.

In all cases, the detected concentrations of BTEX constituents are well below the site-specific Health Based Remediation Goals that have been approved by OEHHA and the RWQCB for soil at the Playa Vista First Phase Project site. HBRGs are permissible concentrations of chemicals in soil, groundwater, and soil gas that ensure protection of workers, residents, and people recreating in the Proposed Project site and are based on health risk protection levels established by US. EPA and Cal-EPA. HBRGs will be developed for the Proposed Project,

subject to approval by OEHHA and RWQCB, which, at a minimum, will be the same as the HBRGs for the First Phase Project.

#### **D. MITIGATION MEASURES.**

As described in Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, on pages 738-739, Appendix J-14, and Section II.13, Corrections and Additions, of the Final EIR, prior to issuance of a building permit for individual development projects within the Proposed Project site, the permit applicant shall submit to LADBS a methane safety plan prepared by a licensed engineer that conforms to the Village at Playa Vista Building Methane Mitigation Guidelines and Methane Mitigation Standard, or the recently adopted City Ordinance No. 175,790 regarding methane mitigation, provided that the requirements of the new ordinance continue to reduce the potentially significant impact to a less than significant level. Based on the levels of methane identified at specific sites, a gas detection system; pressure sensors; ventilation, monitoring, and emergency procedures; and other measures, as provided for in the Village at Playa Vista Building Methane Mitigation Guidelines and Methane Mitigation Standard, or the recently adopted City Methane Ordinance No. 175,790, will be required, as appropriate. All individual components of the methane mitigation systems for the Proposed Project site are recognized as approved means of methane mitigation by LADBS and the City of Los Angeles Fire Department (LAFD). Components of the methane mitigation systems also have 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. The implementation of these mitigation measures would reduce the potentially significant impact to a less-than-significant level. In addition, LADBS may impose more stringent requirements based on localized conditions pursuant to its authority under the Building and Safety Code.

To the extent vent wells are included as part of a building mitigation system, as described in Appendix J of the Draft EIR, the vent wells shall be at least 16 inches in diameter and include filter screens to prevent soil from blocking the vent wells. This differs from the vent wells used in the pilot study at the Playa Vista First Phase Project site. The vent wells used in the pilot study were temporary, 1-inch-diameter wells and were removed at the conclusion of the pilot study.

As described in Appendix J-14 of the Draft EIR, the building methane mitigation systems would 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 would require that testing and annual maintenance reports be filed with the LAFD. The methane mitigation systems in the 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.

---

**TOPICAL RESPONSE**  
**TR-13: FIRST PHASE PROJECT LITIGATION HISTORY**

---

Opponents of the Playa Vista Project have filed 17 lawsuits to which the Applicant is a party challenging various aspects of the Playa Vista First Phase Project, and one lawsuit to which the Applicant is not a party challenging infrastructure necessary for the First Phase Project. Six of those lawsuits challenged the First Phase Project under CEQA. None of the challenges has succeeded.

The City certified the Final EIR for the First Phase Playa Vista Project in 1993. On October 20, 1993, two challengers filed suit pursuant to CEQA challenging the approval by the City of the subdivision tract map for the First Phase Project and the certification of the EIR prepared by the City, in *Save Ballona Wetlands, et al. v. City of Los Angeles, et al.*, Case No. SS005077 (Los Angeles Sup. Ct, petition filed October 20, 1993). Judge David Rothman rejected all challenges and denied the petition for writ of mandate. No appeal was taken.

In 1996, after the Applicant's predecessor processed an addendum to the First Phase Project EIR and a mitigated negative declaration for the City's approval of subdivision tract map 52092 for additions to the project, several local groups brought another challenge under CEQA in *Earth Trust Foundation, et al. v. City of Los Angeles, et al.*, No. SS006405 (Los Angeles Sup. Ct., petition filed October 15, 1996), *affirmed* No. B106408 (Cal. Ct. App. 1997). The trial court upheld the City's decisions and the Court of Appeal affirmed the trial court.

In 1996, opponents filed an action challenging the Section 404 permit to fill 16.1 acres of wetlands issued by the U.S. Army Corps of Engineers under the National Environmental Policy Act ("NEPA") and the Clean Water Act. In August 1998, the district court entered judgment in favor of the Applicant on the Clean Water Act claim, but in favor of the opponents on the NEPA claims. *Wetlands Action Network, et al. v. United States Corps of Engineers, et al.*, CV 96-8407 RSWL (AJWx). On August 21, 2000, in a unanimous decision, the Ninth Circuit issued its decision and found the district court erred when it found in favor of project opponents on the NEPA claim. *Wetlands Action Network v. United States Army Corps of Engineers*, 222 F.3d 1105, 1122 (9th Cir. 2000), *cert. denied*, 534 U.S. 815 (2001). As a result, the Ninth Circuit reversed the district court's judgment in favor of the opponents and upheld the Applicant's project approvals.

In 1998, opponents filed an action under the federal Endangered Species Act, alleging the U.S. Army Corps of Engineers failed to consult with the U.S. Fish and Wildlife Service prior to issuing the Section 404 permit. *California Brown Pelican, et al. v. U.S. Army Corps of*

*Engineers, et al.*, CV 98-621 RSWL. In February 1998, the district court denied the opponents' motion for a preliminary injunction, and, in December 1998, the district court dismissed the complaint as moot, given his decision in the *Wetlands Action Network, et al. v. United States Corps of Engineers, et al.*, CV 96-8407 RSWL (AJWx), discussed above.

In 1999, opponents filed three cases under the Subdivision Map Act, challenging the recordation of final tract maps for the project. See *Wetlands Action Network v. City of Los Angeles, et al.*, BC 207047 (Los Angeles Sup. Court, petition filed March 15, 1999); *Wetlands Action Network v. City of Los Angeles, et al.*, BC 213378 (Los Angeles Sup. Court, petition filed July 12, 1999); and *Wetlands Action Network v. City of Los Angeles, et al.*, BC 220294 (Los Angeles Sup. Court, petition filed November 17, 1999). Judge Ronald Sohigian granted judgment in favor of the City and the Applicant in each of these cases. These judgments were upheld on appeal.

In 1999, opponents filed a challenge to the project under the California Unfair Business Practices Act. *Wetlands Action Network, et al. v. Playa Capital Company, et al.*, Case No. BC 210128 (Los Angeles Sup. Court, complaint filed May 11, 1999). In June 1999, the court denied opponents' motion for preliminary injunction. In February 2000, the opponents dismissed their case.

In 1999, an opponent brought and voluntarily dismissed an action which attacked the Mello-Roos financing hearing procedures. *Venskus v. City of Los Angeles, et al.*, No. SS08868 (Los Angeles Sup. Ct., petition filed October 12, 1999).

In April 2000, opponents filed a challenge against the City, the Applicant and Southern California Gas Company, alleging that the City violated CEQA by not preparing a Subsequent EIR in connection with the City's decision to issue Mello-Roos bonds and housing bonds given alleged new conditions at Playa Vista. *Grassroots Coalition v. City of Los Angeles*, Case No. BS062858 (Los Angeles Sup. Court, first amended and supplemental petition filed June 29, 2000). This case was denied on its merits on October 24, 2000 and a motion for a new trial was denied on January 8, 2001. No appeal was taken.

In 2001, an opponent filed a complaint alleging that natural gas allegedly originating from The Gas Company property west of Area D of Playa Vista is being released at the Playa Vista property such that it constitutes a violation of Proposition 65. *Environmentalism Through Inspiration and Non-Violent Action v. Southern California Gas Company, et al.*, Case No. BC244706 (Los Angeles Sup. Court, complaint filed February 6, 2001). The opponents never served the complaint on the Applicant.

In 2001, an opponent filed a challenge alleging that the City violated CEQA by not preparing a Subsequent EIR in connection with the issuance of Mello-Roos bonds and the approval of the City's Chief Legislative Analyst Report (the "CLA Report"). *Santa Monica Baykeeper v. City of Los Angeles, et al.*, Case No. BS 070757 (Los Angeles Sup. Court, petition filed on July 26, 2001). On February 13, 2002, the court dismissed the petition. No appeal was taken.

In 2001, opponents filed a challenge alleging the City violated the Brown Act during public hearings regarding the City's issuance of Mello-Roos bonds for the project. *Spirit of the Sage, et al. v. City of Los Angeles, et al.*, Case No. BC 256438 (Los Angeles Sup. Court, petition filed on August 20, 2001). On December 19, 2002, the court denied the petition and entered judgment in favor of the City and the Applicant. No appeal was taken.

In 2001, opponents filed a challenge alleging the City's decision to "note and file" the CLA Report triggered the need for a Subsequent EIR for the project. *Environmentalism Through Inspiration and Non-Violent Action, et al. v. City of Los Angeles, et al.*, Case No. BS 073182 (Los Angeles Sup. Court, petition filed on December 10, 2001). On February 10, 2004, the court denied the petition.

In 2002, opponents filed a challenge to project road improvements along Culver Boulevard, alleging the Coastal Commission violated the Coastal Act by allowing development within coastal wetlands. *Sierra Club, et al. v. California Coastal Commission, et al.*, Case No. BC 273358 (Los Angeles Sup. Court, petition filed on January 14, 2002). In October 2002, the court denied the opponents' motion for preliminary injunction and the opponents dismissed their case on April 1, 2003.

In July 2002, opponents filed a challenge to improvements to Route 90 (the Marina Freeway), alleging the Coastal Commission violated the Coastal Act by allowing development in coastal wetlands. *Ballona Ecosystem Education Project ("BEEP"), et al. v. California Coastal Commission, et al.*, Case No. BS077093 (Los Angeles Sup. Court, petition filed on July 10, 2002). The Applicant is not a party to the *BEEP* case, but the permitted work includes work required as a mitigation measure for the First Phase Project. The *BEEP* case is still pending.

In 2003, after an unsuccessful appeal to the Board of Building and Safety Commissioners, an opponent filed a challenge under CEQA to the issuance of grading permits for the development of a temporary erosion control detention basin and a 500,000-cubic yard stockpile within the area of the Proposed Project to support construction activities in the First Phase Project. *Ballona Wetlands Land Trust v. City of Los Angeles, et al.*, Case No. BS 085234 (Los Angeles Sup. Court, petition filed August 21, 2003). The case is still pending.



In 2004, John Tommy Rosas filed *in propria persona* a complaint for alleged violations of his constitutional rights and various federal and state statutes against numerous federal and state agencies, archaeologists, Native American monitors and developers, including the Applicant, regarding, among other things, the excavation of a burial area within the footprint of the riparian corridor. *John Tommy Rosas v. United States of America, Army Corps of Engineers, et al.*, Case No. CV 04-312 WMB. The case is still pending and the Applicant has filed a motion to dismiss the complaint.

---

## VII. RESPONSES TO WRITTEN COMMENTS

---

---

## LIST OF COMMENTORS

---

Letter No.	Commentor
	<b>City of Los Angeles</b>
1	City of Los Angeles, Department of Public Works Bureau of Engineering Edmund Yew, Manager Land Development Group 201 N. Figueroa Street, Suite 200 Stop #901 Los Angeles, CA 90025
2	City of Los Angeles, Department of Public Works Bureau of Sanitation Watershed Protection Division 2714 Media Center Drive Los Angeles, CA 90065 Shaharam Kharaghini, Program Manager
3	City of Los Angeles, Department of Recreation and Parks Bill Lukehart Superintendent Planning and Construction 200 North Main Street 12th Floor, Room 1250CHE Los Angeles, CA 90012
4	City of Los Angeles, Department of Water and Power Charles C. Holloway Supervisor of Environmental Assessment Post Office Box 51111, Room 1044 Los Angeles, CA 90051-0100
	<b>City of Los Angeles Neighborhood Councils</b>
5	Del Rey Neighborhood Council And Del Rey Homeowners and Neighbors Association DRH&NA - Post Office Box 661450 Los Angeles, Ca. 90066
6	Grassroots Venice Neighborhood Council Post Office Box 2224 Venice, CA 90291
7	Mar Vista Community Council P.O. Box 66871 Mar Vista, CA 90066

Letter No.	Commentor
<b>Federal Agencies</b>	
8	Department of the Army Los Angeles District, Corps of Engineers David J. Castanon Chief, North Coast Section Regulatory Branch Post Office Box 532711 Los Angeles, CA 90053-2352
<b>State Agencies</b>	
9	California Coastal Commission South Coast Area Office 200 Oceangate, Suite 1000 Long Beach, CA 90802-4302
10	California Department of Conservation Division of Oil, Gas, & Geothermal Resources Paul L. Frost Associate Oil & Gas Engineer 5816 Corporate Avenue, Suite 200 Cypress, CA 90630-4731
11	California Department of Fish and Game William E. Tippetts Environmental Program Manager 4949 Viewridge Avenue San Diego, CA 92123
12	California Department of Toxic Substances Control Edwin F. Lowry, Director 1011 North Grandview Avenue Glendale, CA 91201
13	California Department of Transportation District 7, Regional Planning IGR/CEQA Branch 120 South Spring Street Los Angeles, CA 90012
14	California Native American Heritage Commission 915 Capitol Mall, Room 364 Sacramento, Ca 95814
15	California Regional Water Quality Control Board Los Angeles Region 320 West Fourth Street, Suite 200 Los Angeles, CA 90013

Letter No.	Commentor
16	Governor's Office of Planning and Research State Clearinghouse and Planning Unit Terry Roberts Director 1400 Tenth Street P.O. Box 3044 Sacramento, CA 95812
<b>Regional Agencies</b>	
17	Los Angeles Unified School District Patrick A. Schanen, Deputy Director (Acting) Office of Environmental Health and Safety 333 S. Beaudry Avenue, 20 <sup>th</sup> Floor Los Angeles, California 90017
18	South Coast Air Quality Management District Steve Smith Program Supervisor, CEQA Section Planning, Rule Development & Area Sources 21865 East Copley Drive Diamond Bar, CA 91765-4182
19	Southern California Association of Governments Jeffrey M. Smith, AICP Senior Regional Planner Intergovernmental Review 818 West Seventh Street, 12th Floor Los Angeles, CA 90017-3435
<b>County and Other City Agencies</b>	
20	City of Culver City 9770 Culver Boulevard Culver City, CA 90232-0507
21	City of Manhattan Beach Laurie Jester, Senior Planner City Hall 1400 Highland Avenue Manhattan Beach, CA 90266-4795
22	City of Santa Monica City Council Office 1685 Main Street Post Office Box 2200 Santa Monica, CA 90407-2200

Letter No.	Commentor
23	County of Orange Planning & Development Services Department Timothy Neely, Manager Post Office Box 4048 Santa Ana, CA 92702-4048
24	Los Angeles County Department of Public Works 900 South Fremont Avenue Alhambra, CA 91803-1331
25	Los Angeles County Department of Regional Planning 320 West Temple Street Los Angeles, CA 90012
26	Los Angeles County Fire Department 1320 North Eastern Avenue Los Angeles, CA 90063
27	Los Angeles County Public Library 7400 East Imperial Hwy. P.O. Box 7011 Downey, CA 90241 7011
28	Los Angeles County Sheriff's Department Gary T. K. Tse, Director Facilities Planning Bureau Sheriff's Department Headquarters 4700 Ramona Boulevard Monterey Park, CA 91754-2169
<b>Private Organizations</b>	
29	Airport Marina Counseling Service Lance Lipscomb 7891 La Tijera Boulevard Westchester, CA 90045
30	Ballona Wetlands Land Trust P.O. Box 5623 Playa del Rey, California
31	Del Rey Homeowners and Neighbors Association DRH&NA - Post Office Box 661450 Los Angeles, Ca. 90066

---

<b>Letter No.</b>	<b>Commentor</b>
32	Friends of Ballona Wetlands Akin Gump Strauss Hauer & Feld LLP Carlyle W. Hall, Jr. 2029 Century Park East, Suite 2400 Los Angeles, CA 90067-3012
33	Friends of the South Bay Bicycle Path Dean Francois, President Post Office Box 808 Hermosa Beach, CA 90254
34	Friends of Sunset Park Zina Josephs, President 1122 Oak Street Santa Monica, CA 90405
35	Grassroots Coalition/Friends of the Children 3749 Greenwood Ave. Los Angeles, CA 90066 966 Schumacher Los Angeles, CA 90048
36	Heal the Bay 3220 Nebraska Avenue Santa Monica, CA 90404
37	KOREH L.A. Sherry Marks 6505 Wilshire Boulevard, #900 Los Angeles, CA 90048
38	Los Angeles County Bicycle Coalition 634 South Spring Street, Suite 821 Los Angeles, CA 90014
39	National Resources Defense Council Joel Reynolds 1314 Second Street Santa Monica, CA 90401
40	Sempra Energy Utilities Southern California Gas Company Jae S. Yi Environmental Specialist 555 West Fifth Street Los Angeles, CA 90013

<b>Letter No.</b>	<b>Commentor</b>
41	Sierra Club Robert Roy van de Hoek, Chair Ballona Wetlands Task Force Post Office Box 5332 Playa del Rey, CA 90296
42	Spirit of the Sage Council 30 North Raymond Avenue Pasadena, California 91103
43	Wetlands Action Network Post Office Box 1145 Malibu, CA 90265
<b>Individuals</b>	
44	Ade Adeniji 13445 Beach Avenue Marina del Rey, CA 90292
45	Tina Aldatz Foot Petals LLC President 6133 Bristol Parkway, #250 Culver City, CA 90230
46	Juan Alvarado 948 S. Inglewood Avenue, #18 Inglewood, CA 90301
47	Tammy Andrews Resident of Playa del Rey 8102 ½ Pershing Drive Playa del Rey, CA 90293
48	Mike Arias 8313 Chase Avenue Los Angeles, CA 90045
49	Gayle Avant 948 South Inglewood Avenue, #19 Inglewood, CA 90301
50	Terry Ballentine 3008 Ocean Avenue Venice, CA 90291
51	Diane Barretti 4160 Admiralty Way, Suite 3F Marina del Rey, CA 90292



---

<b>Letter No.</b>	<b>Commentor</b>
52	Robert E. Bates 13075 Pacific Promenade, #106 Playa Vista, CA 90094
53	Michael R. Bauer 10676 Esterina Way Culver City, CA 90230
54	Carol V. Beck 1053 Elkgrove Avenue, #1 Venice, CA 90291-5721
55	Dr. Suzanne De Benedittis 5800A Hannum Avenue, Suite 219 Culver City, CA 90230
56	William E. A. Berger 12052 Braddock Drive Culver City, CA 90230
57	Karen & Mark Binder 5801 South Kiyot Way, #11 Playa Vista, CA 90094-2139
58	Juliet Bobak 7751 Henefer Avenue Westchester, CA 90045
59	Scott Bouton 2806 Emerson Avenue Los Angeles, CA 90045
60	Terry Braverman Terry Braverman & Company Post Office Box 11571 Marina del Rey, CA 90295-7571
61	Jane Bright 13151 Fountain Park Drive, #C134 Playa Vista, CA 90094
62	Ciara Broderick 116 Sunridge Street Playa del Rey, CA 90293
63	Dennis M. Bryan Ines R. Bryan 6757 Altamor Drive Los Angeles, CA 90045
64	Bruce and Barbara Burns 7314 Kentwood Avenue Westchester, CA 90045-1224

---

<b>Letter No.</b>	<b>Commentor</b>
65	Bruce Campbell 614 Gretna Green Way Los Angeles, CA 90049
66	Cathy Carey 5389 Playa Vista Drive, #434D Playa Vista, CA 90295
67	David Chiappetta 6202 Vista del Mar, #258 Playa del Rey, CA 90293
68	Uncle Darrow's, Inc. 2560 South Lincoln Blvd., Suite 102 Marina del Rey, California 90292
69	Mike and Debbie Clint 7555 W. 83rd Street Playa del Rey, CA 90293
70	Jonathan Coffin 436 W. Regent Street Inglewood, CA 90301
71	Karen Comegys 1725 Cedar Street Santa Monica, CA 90405
72	Terry Conner 13210 Mindanao Way Marina del Rey, CA 90292
73	Danna Cope 8219 Reading Avenue Westchester, CA 90045
74	Mary Lou Crockett 7298 W. Manchester Avenue Los Angeles, California 90045
75	Karen Cross Pacesetter Printing 8626 South Sepulveda Blvd. Los Angeles, CA 90045
76	Mrs. Shawn Crum Westchester Resident SCrum@coxcastle.com
77	Marcelo Cruz, President Co-Voice 6006 West 75th St. Westchester, CA 90045

---

<b>Letter No.</b>	<b>Commentor</b>
78	Christina Davis PO Box 5282 Playa del Rey, CA 90296
79	Mary Davis Ballona Wetlands Land Trust Board Member 7848 Kenyon Avenue Los Angeles, California 90045
80	Don Dearborn 3020 3rd St. Santa Monica, CA 90405
81	Steve Donell 5801 South Kiyot Way, #1 Playa Vista, CA 90094
82	Donna Downing 110 Rees Street Playa Del Rey, CA 90293
83	Richard W. Eames 3738 Mountain View Ave. Los Angeles, CA 90066
84	Kenneth Egan 6553 Firebrand Street Los Angeles, CA 90045
85	barbara eisenberg <barbeebarbvenice@yahoo.com>
86	Chris Ellison 527 East Ellis Avenue Inglewood, CA 90302
87	Helfried Fahrenholz 119 Culver Blvd. Playa del Rey, CA 90293
88	Diane Fecho 4351 Redwood Ave. #3 Marina del Rey, CA 90202
89	William R. Fecho 4338 Redwood Avenue, #203B Marina del Rey, CA 90292
90	James L. Ferro 2029 Century Park East, 34th Floor Los Angeles, California 90067

---

<b>Letter No.</b>	<b>Commentor</b>
91	George Festa 7323 Kentwood Avenue Los Angeles, CA 90045
92	fiteco@aol.com
93	Annette L. Fletcher 7506 McConnell Avenue Westchester, CA 90045
94	D. Forrest P.O. Box 5764 Santa Monica, CA 90409
95	Lisa and Randy Freeman 3705 Wasatch Avenue Mar Vista, CA 90066-3633
96	Sandra Garber 2405 S. Holt Avenue Los Angeles, CA 90034-2126
97	Dorothy Garven 3630 Inglewood Boulevard Los Angeles, CA 90066
98	Aimee Gates 510 S. Burnside Avenue, #11A Los Angeles, CA 90036
99	Dorraine Gilbert 241 Rees Street Playa del Rey, CA 90293
100	Barry Gribbon 6975 Trolleyway Playa del Rey, CA 90293
101	Jennifer Gribbon 6975 Trolleyway Playa del Rey, CA 90293
102	Howard Hackett 5208 Etheldo Avenue Culver City, CA 90230
103	Susana Halpine 239 Sunridge Street Playa del Rey, CA 90293
104	Ann Henrichs 8700 Pershing Drive, #5222 Playa del Rey, CA 90293

---

<b>Letter No.</b>	<b>Commentor</b>
105	David A. Herbst Westchester, CA 90045
106	Lloyd G. Hild 7429 McConnell Avenue Los Angeles, CA 90045-1036
107	James Hill James Hill and Associates 8324 Chase Street Los Angeles, CA 90045
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
109	Eleanor Holm 7417 Henefer Avenue Westchester, CA 90045
110	Gunnar J. Holm 7417 Henefer Avenue Los Angeles, CA 90045
111	Carole Hossan 7725 Hindry Avenue Westchester, CA 90045-3225
112	Agnes Huff Agnes Huff Communications Group, LLC Howard Hughes Center 6601 Center Drive West, Suite 100 Los Angeles, CA 90045
113	Sarah Hughes 114 Montreal Street Playa del Rey, CA 90293
114	Michel Ingham 123 Sunridge Street Playa del Rey, CA 90293
115	Julie Inouye Michael W. Rubottom, M.D. 6508 Vista del Mar Playa del Rey, CA 90293

---

<b>Letter No.</b>	<b>Commentor</b>
116	Nancee Inouye
117	Philip Jamtaas 3225 Malcolm Avenue Los Angeles, CA 90034
118	Ryan Jamrog Corporate Relations Manager LMU Athletics One LMU Drive, MS 8235 Los Angeles, CA 90045-2659
119	Carol Kapp 127 Rees Street Playa Del Rey, CA 90293
120	Kevin Katz vinkman@earthlink.net
121	Yates A. Keir 108 Montreal Street Playa del Rey, CA 90293
122	Dr. Robert Kilroy 2519 Cloverfield Santa Monica, CA 90405
123	Bev Klocki
124	Celia Knight 1040 Victoria Avenue Venice, CA 90291
125	Stephen Knight 12820 Short Avenue Los Angeles, CA 90066
126	Robert A. Krauch 6633 Esplanade Playa del Rey, CA 90293
127	Myra Kriwanek Neighborhood Council Westchester/Playa del Rey Public Safety Chair & Res. Dist. #7 (North Kentwood)6340 Riggs Place Westchester, CA 90045
128	Jim Lamm 10916 Braddock Drive Culver City, CA 90230-4211

---

<b>Letter No.</b>	<b>Commentor</b>
129	Angela Lee 4046 Tivoli Avenue Los Angeles, CA 90066
130	Hyun Gwon Lee Lee & Co. 3660 Wilshire Boulevard, #936 Los Angeles, CA 90010
131	Sue Levitt 12580 Rosy Circle Los Angeles, CA 90066
132	Lance Lipscomb Westchester Resident Travellodge LAX 5547 West Century Boulevard Los Angeles, CA 90045
133	Jocelyn and David Lutzky 5801 Kiyot Way #10 Playa Vista, California 90094
134	N. Challis Macpherson 738 Howard Street Venice, CA 90292-5515
135	Jayne Major Breakthrough Parenting Services 12405 Venice Boulevard, #172 Los Angeles, CA 90066
136	Glenn Marzano Glenn Marzano Photography Post Office Box 12407 Marina del Rey, CA 90295
137	Sylvester Matthews 425 West Regent Street, #12 Inglewood, CA 90301
138	Jeffrey McLean 4400 Westlawn Avenue Los Angeles, CA 90066-6140

---

<b>Letter No.</b>	<b>Commentor</b>
139	Sandy Medrano 13163 Fountain Park Drive, #B-130 Playa Vista, CA 90094
140	Irene Meltzer 12547 Mitchell Avenue Los Angeles, CA 90066
141	Cheryl Mitchell 714 East 92nd Street Los Angeles, CA 90002
142	Ross Moen 4707 La Villa Marina, #D Marina del Rey, CA 90292-7011
143	John Monaghan 121 Sunridge Street Playa del Rey, CA 90293
144	Faridah Monghate 13000 Washington Boulevard Los Angeles, CA 90066
145	Jeanne Moody 7023 Trolley Way Playa del Rey, CA 90293
146	Christopher Moore 205 Rosecrans Place Manhattan Beach, CA 90266
147	Dana Morgan 8500 Belford Avenue Los Angeles, CA 90045
148	Ingrid Mueller 1027 Elkgrove Avenue Venice, CA 90291
149	Laura Munsterteiger 2302 Aviation Boulevard, #A Redondo Beach, CA 90278
150	Richard S. Musella 6383 West 80th Street Westchester, CA 90045
151	Richard Nickey 110 Rees Street Playa del Rey, CA 90293



---

<b>Letter No.</b>	<b>Commentor</b>
152	Guy Nicolet 13075 Pacific Promenade, #112 Playa Vista, CA 90094
153	John W. Nugent 7335 Vista del Mar Lane Playa del Rey, CA 90293
154	Patrick O'Neill 3868 East Boulevard Los Angeles, CA 90066
155	Mark A. Ozzello 8109 Sinaloa Road Playa del Rey, CA 90293
156	Phil Parlett 13115 Washington Boulevard Los Angeles, CA 90066
157	Richard S. Payne 5701 Kiyot Way, #8 Playa Vista, CA 90094
158	Terence Pearce Tweedlbach@aol.com
159	Alicia M. Perez 5399 Playa Vista Drive, #E202 Playa Vista, CA 90094
160	Perryman
161	Shannon C. Phillips 6218 West 77th Street Westchester, CA 90045
162	Linda Piera-Avila 1424 12th Street, #E Santa Monica, CA 90401
163	Elizabeth A. Pollock 11923 Bray Street Culver City, CA 90230-6009
164	Bill Pope Bill.0069@worldnet.att.net
165	Praad Geotechnical, Inc. Daniel Pradel President & Chief Engineer 5465 South Centinela Avenue Los Angeles, CA 90066-6942

---

<b>Letter No.</b>	<b>Commentor</b>
166	Leslie Purcell 11924 W. Washington Blvd. Los Angeles, CA 90066
167	Joe Ravetz 600 Harbor Street, #7 Venice, CA 90291
168	Mollie Reeves 13856 Bora Bora Way, #105C Marina del Rey, CA 90292
169	Michael A. Reifel happyjoyousfreeindian@yahoo.com
170	John Reynolds 3217 17 <sup>th</sup> Street Santa Monica, CA 90405
171	Mary Ballou Richert 2200 Vanderbilt Lane, #22 Redondo Beach, CA 90278
172	Riggs Place Neighbors Mark S. Ludwig Mary Jane Ludwig Jack B. Weinger Alyce Weinger Herman Eisen Marge Eisen 6373 Riggs Place Westchester, CA 90045
173	Ernest Roberts 1944 Virginia Road Los Angeles, CA 90016
174	Eva Roberts 4050 Marcasel Avenue Mar Vista, CA 90066
175	Phil Roberts 891 Washington Street El Segundo, CA 90245
176	Walter Roessner 3651 Barry Avenue Los Angeles, CA 90066
177	Michael & Kathleen Rogers 3624 Inglewood Boulevard Los Angeles, CA 90066

---

<b>Letter No.</b>	<b>Commentor</b>
178	Sara D. Roos 3748 Mountain View Avenue Los Angeles, CA 90066
179	Lee & Marie Roozen and family 7420 Danfield Avenue Los Angeles, CA 90045
180	Nancy Ruben NancyRuben@adelphia.net
181	Bonnie Sachs, ASID • CID Certified Interior Designer 311 Bora Bora Way, Suite 305 Marina del Rey, CA 90292
182	Caroline R. Salter 5625 Crescent Park West, #220 Playa Vista, CA 90094
183	Alex Schub 3670 Mountain View Avenue Los Angeles, CA 90066-3129
184	Roberta Sergant 4313 Mentone Culver City, CA 90232-3444
185	Linda Shafritz 6128 West 75th Place Los Angeles, CA 90045
186	Diane Shapiro 5701 South Kiyot Way, #3 Playa Vista, CA 90094
187	Stephen E. Shepherd Richard Moon & Associates 5959 West Century Boulevard, Suite 950 Los Angeles, CA 90045-6517
188	John Sheppard
189	Mickey Shockley 12460 Lucile St. Los Angeles, CA 90066
190	James R. Smith Post Office Box 644 Venice, CA 90294
191	Mary Smith mary.smith.lfny@statefarm.com

---

<b>Letter No.</b>	<b>Commentor</b>
192	Richard Stall, Jr. 10507 West Pico Boulevard, #200 Los Angeles, CA 90064
193	Richard Standke 22108 Gresham Street West Hills, CA 91304
194	Shelly Stelzer 11912 Weir Street Culver City, CA 90230
195	Richard and Pat Sterner 118 Fowling Street Playa del Rey, CA 90293
196	Russell Stone 7713 Emerson Ave Westchester, CA 90045
197	Isabel Storey Isastor@aol.com
198	Glenn Stronks 7815 Yorktown Place Los Angeles, CA 90045
199	Nancy Swaim 1846 Walgrove Avenue Los Angeles, CA 90066
200	Greg Sweel 1920 Sixth Street, #343 Santa Monica, CA 90405
201	Marcy Szarama Project Manager PinnacleOne Los Angeles mszarama@pinnacleone.com
202	Wei Shoong Teh 5359 South Centinela Avenue Mar Vista, CA 90066
203	Arnold Tena 7728 Hindry Avenue Los Angeles, CA 90045
204	Boise E. Thomas 119 Fowling Street Playa del Rey, CA 90293

---

<b>Letter No.</b>	<b>Commentor</b>
205	Mona and Kenneth Tilden 5625 Crescent Park West Playa Vista, CA 90094
206	Jack Topal 8200 Calabar Avenue Playa del Rey, CA 90293
207	Lawrence and Margaret Toy 3701 Inglewood Boulevard Los Angeles, CA 90066-3211
208	Joseph Treves
209	Roberta Trousdale 321 Fowling Street Playa Del Rey, CA 90293
210	John & Shirley Tweten 11947 Juniette Street Culver City, CA 90230
211	John Jay Ulloth Director-at-Large Southern California Transit Advocates 3010 Wilshire Boulevard, #362 Los Angeles, CA 90010
212	J. Michael Uszler, M.D. 5732 Kiyot Way Playa Vista, CA 90094
213	Marshall E. Uzzle
214	Dan and Nancy Valenzuela 746 Milwood Avenue Venice, CA 90291
215	Tim Vargas 7845 Flight Avenue Los Angeles, CA. 90045
216	Martha Villalobos 13163 Fountain Park, #B-231 Playa Vista, CA 90094

---

<b>Letter No.</b>	<b>Commentor</b>
217	Leila Visram 13163 Fountain Park Drive, #B115 Playa Vista, CA 90094
218	Seema Visram 7301 West Manchester Avenue, #115 Los Angeles, CA 90045
219	Jeanette Vosburg 4124 East Boulevard Los Angeles, CA 90066
220	David C. Voss, Jr. Voss & Associates Marina Towers 4640 Admiralty Way, Suite 800 Marina del Rey, CA 90292-6602
221	Gwen Vuchsas SECO Investigative Services 4553 Glencoe Avenue, Suite 370 Marina del Rey, CA 90292
222	Daniel Walker 7416 West 82nd Street Los Angeles, CA 90045
223	Robert Weldon 8832 Villanova Avenue Los Angeles, CA 90045
224	Dawn Wendl 2864 Pinckard Avenue Redondo Beach, CA 90278
225	Greg Wenger Greg Wenger Photography Post Office Box 9550 Marina del Rey, CA 90295
226	Marvin West 11990 Art Street Sun Valley, CA 91352
227	William West H. B. Drollinger Co. 8929 South Sepulveda Boulevard, Suite #130 Los Angeles, CA 90045

---

<b>Letter No.</b>	<b>Commentor</b>
228	Denis Will 12770 Pacific Avenue, #8 Venice, CA 90291
229	Cindy Williams C. W. Business Center 8939 South Sepulveda Boulevard, #102 Los Angeles, CA 90045-3605
230	William J. Wolitarsky Community Bible Church 6133 Bristol Parkway, #270 Culver City, CA 90230
231	Danny Wong 126 Rees Street Playa del Rey, CA 90293
232	K. Wong 5801 South Kiyot Way, #12 Playa Vista, CA 90094
233	Lew Wright, Sr. FASTFRAME of Westchester 8925 South Sepulveda Boulevard Westchester, CA 90045-3603
234	Nicole Xanten 9018 Villanova Avenue Los Angeles, CA 90045
235	Surfrider Foundation Santa Monica Baykeeper Joe Geever Southern California Regional Manager Surfrider Foundation P.O. Box 6010 San Clemente, CA 92674-6010 Tracy Egoscue Executive Director Santa Monica Baykeeper P.O. Box 10096 Marina del Rey, CA 90295









































Table 4 (Continued)  
NOP Written Comments Summary

Letter No.	I. Summary	II. Project Description	III. A. Environmental Setting	IV. Environmental Impacts																					V. Growth Inducing Impacts	VI. Sig. Irreversible Impacts	VII. Alternatives	Mitigation Monitoring	CEQA Process Issue	Opposition Statement Only	Support Statement Only	No CEQA Issues Raised	General						
				A. Earth	B. Air Quality	C.1 Hydrology	C.2 Water Quality	D. Biotic Resources	E. Noise	F. Light & Glare	G. Land Use	H. Mineral Resources	I. Safety/Risk of Upset	J. Pop. Housing, Employment	K.1 Traffic & Circulation	K.2 Parking	K.3 Bicycle Plan	L.1 Fire Protection	L.2 Police Protection	L.3 Schools	L.4 Parks & Recreation	L.5 Libraries	M. Energy Consumption	N.1 Water Consumption										N.2 Wastewater	N.3 Solid Waste	O. Visual Qualities	P.1 Paleontological Resource	P.2 Archaeological Resource	P.3 Historic Resources
203	Arnold Tena 7728 Hindry Avenue Los Angeles, CA 90045										●	●																											
204	Boise E. Thomas 119 Fowling Street Playa del Rey, CA 90293																																						●
205	Mona and Kenneth Tilden 5625 Crescent Park West Playa Vista, CA 90094																																					●	
206	Jack Topal 8200 Calabar Avenue Playa del Rey, CA 90293																																					●	
207	Lawrence and Margaret Toy 3701 Inglewood Boulevard Los Angeles, CA 90066-3211																																					●	
208	Joseph Treves jntreves@earthlink.net																																					●	
209	Roberta T rousdale 321 Fowling Street Playa Del Rey, CA 90293																																					●	
210	John & Shirley Tweten 11947 Juniette Street Culver City, CA 90230																																					●	
211	John Jay Ulloth Director-at-Large Southern California Transit Advocates 3010 Wilshire Boulevard, #362 Los Angeles, CA 90010																																					●	
212	J. Michael Uszler, M.D. 5732 Kiyot Way Playa Vista, CA 90094																																					●	
213	Marshall E. Uzzle																																					●	
214	Dan and Nancy Valenzuela 746 Milwood Avenue Venice, CA 90291																																					●	
215	Tim Vargas 7845 Flight Avenue Los Angeles, CA. 90045																																					●	
216	Martha Villalobos 13163 Fountain Park, #B-231 Playa Vista, CA 90094																																					●	



