Initial Study/
Mitigated Negative Declaration

Segment C of the Proposed
Park to Playa Trail

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1.0 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

The California Environmental Quality Act (CEQA) (*California Public Resources Code* §21000 et seq.) and the CEQA Guidelines (Title 14, *California Code of Regulations* §15000 et seq.) require that a government agency analyze the potential changes to the environment that would accompany implementation (including construction and use) of a project and that these environmental impacts be disclosed to decision makers and the public prior to project approval. In addition, measures to reduce or avoid any significant impacts should be incorporated into the project.

The Baldwin Hills Regional Conservation Authority (BHRCA) owns an undeveloped parcel of land west of La Cienega Boulevard and east of the Baldwin Hills Scenic Overlook, within the Blair Hills area of the City of Culver City. The BHRCA is proposing a walking and hiking trail on this parcel that would connect the Baldwin Hills Scenic Overlook (east of Jefferson Boulevard) with the Kenneth Hahn State Recreation Area (KHSRA) (east of La Cienega Boulevard). This trail is referred to as Segment C of the eastern portion of the Park to Playa Regional Trail Project (Park to Playa Trail). The Park to Playa Trail project will be a 13-mile multi-modal trail network connecting the Baldwin Hills Parklands to the Pacific Ocean. The eastern portion of the Park to Playa Trail is an approximate seven-mile system of walking, hiking, and bicycle trails running east-southeasterly through parks and open space areas in the Baldwin Hills (including existing trails in Culver City Park, the Baldwin Hills Scenic Overlook, the KHSRA, and along the Stocker Street Corridor. The western portion of the Park to Playa Trail consists of the existing Ballona Creek Bike Path in Culver City and the Marvin Braude Bike Path in Playa del Rey.

An Initial Study (SCH No. 2013011021) was prepared for Segments A to I of the eastern portion of the Park to Playa Trail in 2013 and a Mitigated Negative Declaration (MND) was adopted by the BHRCA Governing Board on May 28, 2013, along with the approval of Segments A–B and D–I of the proposed trail. Comments received during the public review period prompted the BHRCA to not include Segment C in the project approval to allow the trail alignment for this segment to be further redefined through additional input from stakeholders. Several community meetings were subsequently held and a new alignment for the eastern portion of Segment C (closest to La Cienega Boulevard) has been developed as a result of new feedback. The proposed alignment for the western portion (closest to the Baldwin Hills Scenic Overlook) remains the same.

This Initial Study (IS) analyzes the environmental impacts of Segment C of the Park to Playa Trail (also referred to as the "project" or "proposed project"). The analyses includes the construction of proposed trail improvements through the BHRCA property and a pedestrian bridge over La Cienega Boulevard, along with subsequent use of the Segment C trail.

While impacts associated with the previous alignment of Segment C were analyzed in the IS/MND for the Park to Playa Trail (May 2013), the new alignment of Segment C, including the proposed pedestrian bridge, could result in new environmental impacts that were not analyzed in the previous IS/MND. Thus, this IS/MND uses the information and analysis in the previous Park to Playa Trail IS/MND that remains relevant to the refined Segment C but updates the information, where necessary; discusses the impacts of Segment C that are different than the impacts discussed in the previous Park to Playa Trail IS/MND; identifies regulatory requirements and mitigation measures in the previous IS/MND that remain applicable to Segment C; and develops new mitigation measures for the impacts specifically associated with the redefined Segment C, as necessary.

Section 15367 of the State CEQA Guidelines defines the Lead Agency as the public agency with the primary responsibility for carrying out or approving a project. The BHRCA will be responsible for approving the construction of Segment C trail on their property and, therefore, is serving as the Lead Agency for the project.

As the Lead Agency, the BHRCA is responsible for completing the environmental review process, as required under CEQA and the CEQA Guidelines, and has authorized the preparation of this IS. Section 15063(c) of the CEQA Guidelines identifies the purposes of an IS as follows:

(1) To provide the Lead Agency with information to use as the basis for deciding whether to prepare an environmental impact report (EIR) or a Negative Declaration;

(2) To enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration;

(3) To assist in the preparation of an EIR, if one is required, by focusing the EIR on the effects determined to be significant, identifying the effects determined not to be significant, explaining the reasons for determining that potentially significant effects would not be significant, and identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects;

(4) To facilitate environmental assessment early in the design of a project;

(5) To provide documentation of the factual basis for the finding in a Negative Declaration that a project will not have a significant effect on the environment;

(6) To eliminate unnecessary EIRs; and

(7) To determine whether a previously prepared EIR could be used with the project.

Since Segment C has not been approved and the trail alignment and improvements for Segment C have been revised over the alignment that was analyzed in the Park to Playa Trail IS/MND, this Initial Study addresses the impacts of the new alignment of Segment C alone and provides the BHRCA with information to use as the basis for preparing the appropriate CEQA document (e.g., a Negative Declaration instead of an EIR), as well as allows the BHRCA to mitigate the significant adverse impacts of the project, thereby enabling the project to qualify for a Mitigated Negative Declaration (MND). The Initial Study also serves as documentation for the finding in an MND that the project will not have a significant effect on the environment.

This document has been structured as a combined IS/MND. Based on the findings of the environmental analysis, the MND component of this document describes the reasons that the proposed project will not have a significant effect on the environment with the implementation of mitigation measures and provides documentation in support of the determination that the BHRCA does not need to prepare an EIR.

In accordance with Section 21082.1(c) of CEQA and Section 15074(b) of the State CEQA Guidelines, the BHRCA utilized consultant support in the preparation of this IS/MND and has reviewed and determined that the findings of the IS/MND reflect its own independent judgment.

1.2 SUMMARY OF PROJECT IMPACTS AND MITIGATION

The proposed Segment C trail alignment would be improved through the construction of a new trail leading down from the parking lot of the Baldwin Hills Scenic Overlook, along the northern end of a retention basin on the BHRCA parcel and on the slopes around the parcel that was previously developed with a school and where the Stoneview Nature Center is under construction, down to the northeastern section of the BHRCA parcel; the project also proposes a pedestrian bridge over La Cienega Boulevard to connect to an existing trail at the KHSRA. Trail improvements would include soil excavation and grading; compaction of native soils for creation of an at-grade trail; provision of fencing and wayfinding signs; construction of an interpretive node along the trail; planting of a landscaped buffer along the trail; creation of a potential elevated boardwalk trail south of the Stonveview Nature Center; CMU walls and visual screening; restoration and revegetation of disturbed areas adjacent to the new trail; construction of steps from the Baldwin Hills Scenic Overlook to the BHRCA property; construction of a pedestrian bridge over La Cienega Boulevard; and the undergrounding of overhead utility lines along La Cienega Boulevard.

As discussed in Section 4.0 of this IS/MND, the project would have no adverse impacts or less than significant impacts on the following environmental issues due to the proposed low intensity recreational trail use and the limited extent of the proposed trail improvements:

- Agriculture and Forestry Resources
- Greenhouse Gas Emissions
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Recreation

There are existing local, State, and federal regulations or laws that the project would need to comply with, independent of CEQA review. These regulations serve to offset or prevent certain environmental impacts. Regulatory requirements (RRs) would effectively reduce the project's potential adverse impacts to less than significant levels for the following issues:

- Air Quality
- Geology and Soils
- Hydrology and Water Quality
- Public Services
- Utilities and Service Systems

Because the RRs would be incorporated into the project either in the design or as part of project implementation, they do not constitute mitigation in accordance with CEQA.

Based on the analysis in Section 4.0 of this IS/MND, Segment C would have the potential for significant adverse environmental impacts on the following issues:

- Aesthetics
- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Noise
- Transportation/Traffic

While some of the significant adverse impacts would occur only during short-term construction activities, the proposed project would have to implement mitigation measures (MMs) to avoid or reduce these impacts to less than significant levels. Section 15370 of the State CEQA Guidelines defines "mitigation" as follows:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Table 1-1, located at the end of this section, identifies the RRs and MMs that would prevent, avoid or reduce the environmental impacts of the proposed project. The first column states the RR or MM, with the implementing action provided in the second column; and the level of impact after implementation of the RR or MM is provided in the third column.

As shown, Segment C would have less than significant impacts on all environmental issues after the implementation of the RRs and MMs.

According to the CEQA Guidelines, the BHRCA may adopt an MND for the proposed project because, with the incorporation of the RRs and implementation of the MMs, potentially significant environmental impacts from Segment C would be reduced to less than significant levels.

1.3 PUBLIC REVIEW

In accordance with Section 15073 of the State CEQA Guidelines, a 30-day public review and comment period (from November 23, 2015 to January 22, 2016) was established to allow affected agencies and interested individuals with an opportunity to provide input on the project's environmental review process. At the start of this public review period, the IS/MND was distributed to responsible and trustee agencies and other interested agencies/parties for review and comment.

In compliance with Section 15072 of the State CEQA Guidelines, a Notice of Intent to Adopt the IS/MND was also published in the *Los Angeles Times* newspaper on November 23, 2015 and the notice has been filed with the Los Angeles County Registrar-Recorder/County Clerk and the California Governor's Office of Planning and Research (State Clearinghouse). In addition, the Notice of Intent was posted at the Kenneth Hahn State Recreation Area, Baldwin Hills Scenic Overlook, and Culver City Hall. Furthermore, the IS/MND and associated technical reports were made available for electronic viewing at the following websites:

Baldwin Hills Regional Conservation Authority website: http://smmc.ca.gov/BHRCA.asp

Baldwin Hills Conservancy website: http://www.bhc.ca.gov/

Hard copies of the documents are also available for public review at the following locations:

Baldwin Hills Library
Reference Desk
2906 S. La Brea Avenue
Los Angeles, California 90016

Kenneth Hahn State Recreation Area
Community Center
4100 South La Cienega Boulevard
Los Angeles, CA 90056

Baldwin Hills Scenic Overlook
Visitor Center
6300 Hetzler Road
Culver City, CA 90232

Los Angeles River Center and Gardens
570 West Avenue 26, Suite 100
Los Angeles, California 90065

During the public review period, the BHRCA will accept public comments on the IS/MND. Comments on the IS/MND should be sent to:

Josephine Alido
BonTerra Psomas
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
Jalido@psomas.com

A public meeting has been scheduled for 6:00 PM on December 10, 2015 at:

Dan Patacchia Conference Room
City Hall of Culver City
9770 Culver Boulevard
Culver City, CA 90232

1.4 PROJECT APPROVAL

A hearing before the BHRCA Board will be held at a future date to consider adoption of the IS/MND and a decision on the approval of Segment C. In accordance with Section 15074 of the State CEQA Guidelines, prior to approving the project or modifications to the project, the BHRCA Board must consider the IS/MND together with any comments received during the public review process and adopt the MND only if it finds that that there is no substantial evidence that the project will have a significant effect on the environment.

1.5 ORGANIZATION OF IS/MND

This IS/MND is organized into the following sections:

Section 1.0: Introduction. This section provides an introduction to the IS/MND process and summarizes the findings of the environmental analysis.

Section 2.0: Environmental Setting. This section provides a description of the project location and the existing environmental setting of the project area. The existing conditions on Segment C are described in this section.

Section 3.0: Project Description. This section describes the objectives established for Segment C; provides a project description (i.e., physical and operational characteristics); and identifies the discretionary actions needed to facilitate project implementation.

Section 4.0: Environmental Analysis. The completed CEQA checklist form, as provided in this section, provides the analysis of the potential impacts on each environmental issue area that may result from implementation of the proposed project. The environmental checklist form includes "mandatory findings of significance" in compliance with CEQA requirements. This section also identifies the RRs and MMs that would avoid or eliminate the project's potentially significant adverse effects or reduce them to less than significant levels.

Section 5.0: References. This section identifies the references used in the preparation of the IS/MND.

Section 6.0: Preparers. This section identifies the individuals responsible for preparing the IS/MND.

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
Aesthetics		
MM 4.1-1 Any new light sources that would be installed as part of the project shall provide the minimum lighting levels to meet security and safety purposes; shall be directed downward and away from adjacent residential areas; and shall be shielded, diffused, or indirect to prevent spillover into adjacent residential properties. Also, no flashing, flickering, rotating or moving lights shall be allowed.	The design-build contractor shall prepare a photometric study that shows the proposed light sources and resulting lighting levels to determine if light spillover will extend into adjacent residential properties. If light spillover will occur, the light sources shall be replaced, redesigned, and/or relocated until no light spillover into adjacent residential properties would occur. The lighting plan and results of the photometric study shall be submitted to the Los Angeles County Department of Public Works as part of the plan check process. Upon approval of the photometric study and the project's lighting plan by the County, the project shall be implemented in compliance with the lighting plan.	Less than significant
MM 4.1-2 The design-build contractor shall ensure that exterior bridge finishes that are made of glass, metals or mirrors are painted, tinted and/or textured so as not to cause glare or flash blindness that could adversely affect the vision of motorists on La Cienega Boulevard and on surrounding roads and of residents in adjacent dwelling units.	The design-build contractor shall submit information on bridge finishes to show compliance with this MM to the Los Angeles County Department of Public Works, as part of the plan check process, for County approval prior to the commencement of any construction activities.	Less than significant
Air Quality		
RR 4.3-1 Project construction shall comply with the South Coast Air Quality Management District's (SCAQMD's) Rule 403, Fugitive Dust, which requires the implementation of best available control measures (BACMs) for any activity or man-made condition capable of generating fugitive dust, including, but not limited to, earth-moving activities; construction/ demolition activities; disturbed surface area; or heavy- and light-duty vehicular movement. The BACMs include incorporating soil stabilization measures; watering surface soils and crushed materials; covering hauls or providing freeboard; preventing track-out; limiting vehicle speeds; and wind barriers, among others.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to the approval of the County), and the contractor shall comply with this regulation during construction activities.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
Biological Resources		
MM 4.4-1 Prior to vegetation clearing and the start of construction activities for Segment C, the contractor shall provide protective fencing around the Southern California black walnut trees in the parking lot of the Baldwin Hills Scenic Overlook. The protective fencing shall be placed along the dripline of the trees. No ground disturbance or other work shall be performed within the fencing limits.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall implement this MM prior to and during construction activities.	Less than significant
MM 4.4-2 In order to avoid impacts on nesting birds and raptors (common or special status), construction activities shall be conducted during the non-breeding season (i.e., generally between September 16 and February 14 for migratory birds; July 1 and January 31 for nesting raptors), to the extent feasible. If project timing requires that construction occur between February 1 and September 15 (incorporating the typical breeding season for migratory birds and raptors), then a pre-construction nesting bird/raptor survey (or multiple surveys) shall be conducted by a qualified Biologist within three days prior to disturbance within 500 feet of the project impact area to determine the presence or absence of active nests. Any nest found during the survey efforts shall be mapped on the construction plans. If no active nests are found, no further mitigation would be required. If an active nest is located within or adjacent to the construction area and the Biologist determines that work activities may impact nesting, s/he shall demarcate an appropriate buffer zone around the nest. The size of the buffer may vary depending on site features, the sensitivity of the species, and the type of construction activity, but shall be designed to prevent disruption of nesting activity. Only limited construction activities (if any) shall be approved by the Biologist to take place within the buffer zone. The buffer zone restrictions shall be suspended once the Biologist determines that nesting activity has ceased and fledglings have left the nest.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall hire a qualified Biologist to implement this MM, and the Contractor shall comply with the Biologist's recommendations prior to and during construction activities.	Less than significant

TABLE 1-1
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Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
MM 4.4-3 To mitigate for the loss of California brittle bush – California sagebrush scrub, California brittle bush – California sagebrush – coyote brush scrub, and coyote brush scrub/needle grass grassland, prior to issuance of a grading permit, the contractor shall preserve or restore sage scrub habitat either on-site or at a suitable off-site location at a ratio no less than 1:1. Any habitat area proposed for preservation in order to meet the 1:1 criterion shall be located in a permanent open space or shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA. Mitigation areas shall not be located within fuel modification zones. In addition, it should be noted that type conversion of existing native communities shall not occur (e.g., areas of needle grass grassland, a native vegetation type, shall not be used as a mitigation site for sage scrub restoration). A Sage Scrub Restoration Program shall be prepared and implemented by, or in consultation with, a qualified native plant revegetation specialist. The Restoration Program shall be in accordance with a landscape palette approved by the Los Angeles County Department of Regional Planning (LACDRP). Restoration shall consist of seeding and planting containers of appropriate sage scrub species. If on-site preservation is used to satisfy the mitigation, a qualified Biologist shall mark the limits of sage scrub communities (i.e., California sagebrush scrub, disturbed California sagebrush scrub, California brittle bush – California sagebrush scrub, California brittle bush – California sagebrush – coyote brush scrub, and coyote brush scrub/needle grass grassland) near the construction area. Construction limits shall be flagged in the field, and no earth-moving equipment shall be allowed in these areas. If off-site restoration is used to satisfy the mitigation, the contractor shall hire a qualified Biologist to identify a suitable restoration location near existing sage scrub communities in the BHRCA parcel and to prepare and implement a Sage Scrub Restoration Program. The Restoration Program shall include performance standards that shall apply to the revegetation of sage scrub. Revegetation shall be considered	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall hire a qualified Biologist to implement this MM, and the Contractor shall comply with the Biologist's recommendations prior to and during construction activities.	Less than significant

TABLE 1-1
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successful if the percent cover and species diversity of the restored and/or created habitat areas are similar to the percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas.		
MM 4.4-4 The proposed landscaping and revegetation for the proposed project shall incorporate the use of native plant species to the maximum extent practicable. The species selected for installation shall be in accordance with a landscape palette approved by the Los Angeles County Department of Public Works (LACDPW). To minimize the potential for invasive, exotic plant species to escape into natural open space areas adjacent to the proposed project, the plant palette shall avoid the use of exotic plant species that are known to be highly invasive.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall hire a qualified professional landscape architect and/or habitat restoration specialist to review the landscape palette prior to installation.	Less than significant
MM 4.4-5 Areas under the jurisdiction of the Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Wildlife (CDFW) shall be avoided to the maximum extent practicable. If these areas will be impacted by the proposed project, prior to the approval of the project plans and specifications, the County shall confirm that regulatory permit authorizations from the RWQCB and the CDFW (or authorization to proceed without such permits) have been obtained for the project. Impacts to jurisdictional resources shall be determined considering both permanent and temporary impacts resulting from project construction, as well as long-term maintenance that can disturb the open drainage channel and may be characterized as dredge or fill within jurisdictional waters. The project application shall be obligated to implement/comply with the mitigation measures required by the resource agencies regarding impacts on their respective jurisdictions, which may include restoration, enhancement, replacement, or preservation of on-site or off-site jurisdictional areas at a minimum ratio of 1:1 of the lost jurisdictional value. Habitat preservation, replacement or restoration that will result in no net loss shall be used to offset impacts, as outlined in the permit conditions.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The design-build contractor shall obtain the necessary resource agency permits and shall comply with permit conditions prior to and during construction activities.	Less than significant

TABLE 1-1
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Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
MM 4.4-6 The design-build contractor shall ensure that night lighting, if utilized along the proposed trail, shall be kept to the minimum necessary for public safety. Night lighting shall be directed downward away from adjacent habitat areas and shielding will be incorporated into the lighting design to minimize the increase in ambient light in adjacent open space.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall implement this MM as part of MM 4.1-1.	Less than significant
Cultural Resources		
RR 4.5-1 In accordance with Section 7050.5 of the *California Health and Safety Code,* if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with Section 5097.98 of *the California Public Resources Code,* the NAHC shall immediately notify the persons it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the BHRCA, the disposition of the human remains. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the BHRCA rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (14 *California Code of Regulations* §15064.5[e]).	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to the approval of the County), and the contractor shall comply with this regulation upon the discovery of human remains during ground-disturbing activities.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
MM 4.5-1 Prior to and during construction activities, an Archaeologist shall be present at the pre-grade conference; shall establish procedures for archaeological resource surveillance; and shall establish, in cooperation with the Project Engineer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of artifacts, as appropriate. If archaeological resources are found to be significant, the Archaeologist shall determine appropriate actions, in cooperation with the BHRCA, for exploration and/or salvage. Work may proceed in other areas, subject to the direction of the Archaeologist. For any archaeological resource found during ground-disturbing activities, the Archaeologist shall first determine whether it is a "unique archaeological resource" pursuant to Section 21083.2(g) of the *California Public Resources Code* (PRC) or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "unique archaeological resource" or a "historical resource", the Archaeologist shall formulate a mitigation plan in consultation with the BHRCA that satisfies the requirements of the above-referenced regulations. If the Archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource", s/he may record the site and submit the recordation form to the California Historic Resources Information System at the South Central Coastal Information Center at California State University, Fullerton. The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow the guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the BHRCA and to the California Historic Resources Information System at the South Central Coastal Information Center at California State University, Fullerton.	Prior to the start of construction activities, the County shall check that the design-build contractor has retained a qualified Archaeologist to implement this MM, including the monitoring of grading activities and the salvage and catalogue of archaeological resources, as necessary.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
MM 4.5-2 During grading and excavation activities, if fossil resources are discovered by the Archaeological Monitor, Project Engineer, or other parties, ground-disturbing activities in the vicinity of the discovery shall be halted or diverted until a qualified Paleontologist inspects the find and evaluates its significance. Work may proceed in other areas, subject to the direction of the Paleontologist. If determined significant, the Paleontologist shall have the authority to quickly and efficiently salvage and remove the fossil from its locality, as appropriate, before ground-disturbing activities resume in the area. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the BHRCA.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to the approval of the County), and the contractor shall comply with this regulation upon the discovery of fossil resources during ground-disturbing activities. The design-build contractor shall hire a paleontologist (subject to approval by the County) to perform the resource evaluation and disposition, as necessary.	Less than significant
Geology and Soils		
RR 4.6-1 Project design and construction shall comply with Part 2 of Title 24 of the California Code of Regulations (California Building Code), which provides building standards for construction, alteration, moving, demolition, repair, maintenance, and use of all buildings or structures.	The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval by the County during the plan check process. Approved plans shall be implemented by the contractor.	Less than significant
RR 4.6-2 In compliance with the California Building Code, the Alquist-Priolo Earthquake Fault Zoning Act, and the Seismic Hazards Mapping Act, a project-specific geotechnical investigation shall be conducted to identify geologic and seismic hazards where structural elements and structures would be constructed and to provide detailed geotechnical design parameters, safety factors, and recommendations to be incorporated into the project plans. The recommendations of the geotechnical report shall be used in the engineering design and construction of proposed structures.	The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval by the County during the plan check process. Approved plans shall be implemented by the contractor.	Less than significant

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Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
Hazards and Hazardous Materials		
RR 4.8-1 Construction and maintenance activities for the project shall comply with existing regulations regarding hazardous material use, storage, disposal, and transport so that no major threats to public health and safety are created. These regulations include the Toxic Substance Control Act, Hazardous Material Transportation Act, Resource Conservation and Recovery Act, California Hazardous Waste Control Act, Certified Unified Program Agency, and California Accidental Release Prevention Program.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with pertinent hazardous material regulations during construction and maintenance activities on Segment C.	Less than significant
RR 4.8-2 In accordance with Title 8, Section 1541, of the California Code of Regulations (CCR), persons planning new construction and/or excavations or new utility lines near or crossing existing subsurface installations and lines, high-pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, and other high-priority lines, are required to notify the Owner/Operator of the line and to determine the locations of subsurface lines prior to any ground disturbance for excavation. Coordination, approval and monitoring by the Owner/Operator of the line would avoid damage to high-priority lines and the creation of hazards to the surrounding area.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with these regulations during construction activities near or across underground utility lines.	Less than significant
RR 4.8-3 In the event that abandoned oil wells are uncovered during construction, the contractor shall consult with the California Department of Oil, Gas and Geothermal Resources (DOGGR) to ensure that these wells were properly abandoned; otherwise, these wells shall be plugged and abandoned in accordance with Chapter 4 of Title 14, Division 2 of the California Code of Regulations. The requirements include filing a notice with the DOGGR; proper use of cement plugs; building/structure setbacks; and provision of vent combs.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with pertinent DOGGR regulations during construction activities on or near abandoned wells.	Less than significant

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Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
RR 4.8-4 As stated in Chapter 326 in Title 32 of the Los Angeles County Code, the contractor shall obtain a permit from the County for all construction and maintenance activities in hazardous fire areas. The contractor shall then comply with the provisions of the permit, including the availability of fire protection equipment; an adequate water supply; creation of fire breaks; installation of warning signs; brush removal; adequate emergency access; fencing; and the use of equipment and machinery with spark arresters.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with this regulation during construction and maintenance activities on Segment C.	Less than significant
RR 4.8-5 As stated in Division 25 of Article 7 of Chapter 5 of the Los Angeles City Municipal Code, signs shall be posted along Segment C, which outline prohibitions on open burning, smoking, flaming or glowing objects, and open flames.	The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval). The contractor shall include the required signs in the project plans; shall install the required signs; and shall comply with these regulations during construction and maintenance activities on Segment C.	Less than significant
MM 4.8-1 All construction crew shall wear Flame Resistant Clothing ("FRC") with a Hazard/Risk Category ("HRC") rating of 1, steel toe boots, hard hats, and safety glasses during construction activities at the BHRCA parcel, as may be required by FMO&G.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this mitigation during construction activities on Segment C.	Less than significant
MM 4.8-2 The Contractor shall prepare and implement a Health and Safety Plan that includes protocols for environmental and personnel monitoring, requirements for personal protective equipment, other appropriate health and safety protocols, and procedures for the handling and disposal of arsenic and petroleum hydrocarbon containing-soils, based on the findings of the Limited Soil Sampling Report by Geocon (dated October 13, 2015).	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this mitigation during construction activities on Segment C.	Less than significant
MM 4.8-3 If stained, discolored and/or odorous soils are encountered during grading or excavation activities, work in the immediate area shall cease and the design-build contractor shall have a sample of the soils analyzed for the presence of contamination. If the results of the testing show that chemical levels are present below regulatory levels, grading and excavation activities may proceed accordingly.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this mitigation during construction activities.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
Otherwise, remediation and/or removal of the contaminated soils shall be completed prior to continued ground disturbance if chemical levels are above regulatory standards. Remediation and/or disposal shall be conducted with the oversight of applicable regulatory agencies such as the Los Angeles County Fire Department [operating as the CUPA], the South Coast Air Quality Management District (SCAQMD), the California Department of Toxic Substances Control (DTSC), and/or the U.S. Environmental Protection Agency and in compliance with established maximum contaminant levels (MCLs).		
Hydrology and Water Quality		
RR 4.9-1 Project construction shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002, or the latest approved general permit). This General Permit requires construction activities (including demolition, clearing, grading, excavation, and other land-disturbing activities) that result in the disturbance of one acre or more of total land area to file and submit a Notice of Intent (NOI); Risk Assessment; Site Map; Storm Water Pollution Prevention Plan (SWPPP); annual fee; and a signed certification statement to the State Water Resources Control Board prior to construction. In order to obtain coverage under the Construction General Permit, a project-specific SWPPP shall be prepared, which shall contain Best Management Practices (BMPs) that would be implemented to reduce or eliminate construction-related pollutants in the runoff. As part of the SWPPP preparation and implementation, the design-build contractor shall also comply with the County of Los Angeles' Construction Site Best Management Practices Manual that contains the County's requirements for BMPs to include in the SWPPP and the implementation of BMPs during construction.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with these State and County regulations, including the filing of the NOI and preparation of the SWPPP prior to construction activities and the implementation of BMPs and other items in the SWPPP during construction activities for the proposed project.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
RR 4.9-2 In accordance with the storm water regulations of the Cities of Los Angeles and Culver City and the County of Los Angeles, project construction and maintenance shall not involve the discharge of polluting substances (e.g., liquids, solids, gases or other pollutants) that may pose a hazard to humans, animals, plants, and fish into the storm drain system or receiving waters. Also, refuse, rubbish, tin cans, or other matter that may impede, retard, or change the normal direction of the flow of the flood, storm, and other waters or that may be carried downstream by such waters, causing damage and detriment to downstream properties, shall not be placed in or near drainages. Runoff management requirements include good housekeeping practices and BMPs that are consistent with environmental goals.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this regulation during construction and maintenance activities on Segment C.	Less than significant
Noise		
RR 4.12-1 Project construction shall comply with the most restrictive time limits and other applicable noise regulations of the City of Los Angeles, City of Culver City, and County of Los Angeles municipal codes. Construction using any equipment that makes loud noises that would disturb persons in nearby residences (including the operation, repair, or servicing of construction equipment and the jobsite delivering of construction materials) shall be limited to the hours of 8:00 AM to 7:00 PM, Monday through Friday, and from 9:00 AM to 6:00 PM on Saturday. No construction shall be allowed on Sundays or holidays.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be approved by the County during the plan check process), and the contractor shall implement this RR during construction activities.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
MM 4.12-1 As part of construction activities, the contractor shall implement the following: a. All construction vehicles or equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Mufflers shall be equivalent to or of greater noise reducing performance than the manufacturer's standard. b. Stationary equipment, such as generators and air compressors, shall be located as far from residences and parks as feasible. Where stationary equipment must be located within 250 feet of a residence, the equipment shall be equipped with appropriate noise-reduction features (e.g., silencers, shrouds, or other devices) to limit the equipment noise at the sensitive receptor to an average noise level (L_{eq}) of 65 A-weighted decibels (dBA). c. Equipment maintenance, vehicle parking, and material staging areas shall be located as far away from local residences, as feasible.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be approved by the County during the plan check process), and the contractor shall implement this MM during construction activities.	Less than significant
MM 4.12-2 If nighttime or Sunday work for pedestrian bridge construction is necessary to avoid lane closures on La Cienega Boulevard during the daytime hours from Monday to Saturday, the design-build contractor shall obtain a permit for nighttime or Sunday construction work from the County Engineer per Section 12.12.050 of the Los Angeles County Code. The design-build contractor shall also request permissions from the Cities of Culver City and Los Angeles for any nighttime and Sunday work. In addition, the noisiest activities (as associated with the construction of bridge foundations and ramps) shall be scheduled, to the extent feasible, between 8:00 a.m. and 7:00 p.m., Monday through Saturday. Otherwise, noise barriers, equipment enclosures, hospital-grade mufflers and/or other noise reduction measures shall be provided between the noise source and the adjacent residences to ensure that noise from construction activities do not exceed the County's standards for noise levels at residential areas, as generated by mobile and stationary equipment during the hours of 7:00 p.m. to 8:00 a.m. and all day on Sunday and legal holidays.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be approved by the County during the plan check process), and the contractor shall implement this MM during construction activities.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
MM 4.12-3 If caissons or piles are required for the pedestrian bridge foundations, prior to the granting of a building permit, the design-build contractor shall provide a vibration analysis prepared by a registered professional engineer. The vibration analysis shall demonstrate that construction methods to be used would not cause structural damage or substantial annoyance at nearby residences. Criteria for determining impact shall be based on the California Department of Transportation's Transportation and Construction Vibration Guidance Manual, the Federal Transit Administration's Transit Noise and Vibration Impact Assessment or similar accepted authority for vibration impacts. In conditions of conflict, the most stringent regulation shall govern.	The design-build contractor shall submit the vibration analysis to the County for review and approval during the plan check process, and the contractor shall implement the recommendations in the vibration analysis during construction activities.	Less than significant
Public Services		
RR 4.14-1 Trail users shall comply with Title 17, Parks, Beaches and Other Public Areas, of the Los Angeles County Code, which outlines the activity restrictions and regulations at parks and public areas. These regulations include hours of operation; prohibited activities; use and access restrictions; and fines and penalties. Signs shall be provided along the trail to inform the public of allowable uses and activity restrictions.	The design-build contractor shall post signs along the trail to inform the public of allowable uses and activity restrictions, with the signs shown on project plans that would be subject to review and approval by the County. The County Sheriff's Department shall be responsible for monitoring and enforcing these regulations on Segment C.	Less than significant
RR 4.14-2 Trail users and the construction crew shall comply with Title 14, Division 3 of the *California Code of Regulations,* which contains regulations related to the use of park facilities, litter, plants and animals, fire, smoking, weapons and traps, fireworks, noise, solicitation, and other activities allowed or prohibited in State parks.	The design-build contractor shall be responsible for compliance by the construction crew and the State Parks Ranger shall be responsible for monitoring and enforcing these regulations at the Baldwin Hills Scenic Overlook.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
Transportation/Traffic		
RR 4.16-1 In accordance with the Cities of Los Angeles and Culver City and the County of Los Angeles' general construction requirements, temporary traffic control measures shall be implemented in accordance with the Standard Specifications for Public Works Construction (Greenbook) and the County's Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), which contain standards for maintenance of access, traffic control, and notification of emergency personnel.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). During construction activities, the contractor shall provide temporary traffic control measures in accordance with the Greenbook and Graybook.	Less than significant
RR 4.16-2 Trail improvements on public rights-of-way shall include the provision of traffic control devices in compliance with the Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on streets and highways. The MUTCD includes standards for signs, markings, and traffic control devices needed to promote pedestrian and vehicle safety and traffic efficiency.	The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall design and construct all improvements on public roadways in accordance with the MUTCD.	Less than significant
RR 4.16-3 In order to avoid the creation of traffic hazards to vehicles on La Cienega Boulevard, the proposed pedestrian bridge shall have a vertical clearance of at least 17 feet, in accordance with Federal Highway Administration (FHWA) guidelines.	The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval during the plan check process) and shall design and build the pedestrian bridge in compliance with this guideline.	Less than significant
MM 4.16-1 Any temporary and/or partial closure of travel lanes on La Cienega Boulevard shall be scheduled during the nighttime hours from 9 PM to 6 AM of the following day.	The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process), and the contractor shall comply with this regulation during construction activities for Segment C.	Less than significant

TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation of RR or MM
Utilities and Service Systems		
RR 4.17-1 As stated in Title 31, Green Building Standards Code, of the Los Angeles County Code, at least 65 percent of all construction and demolition debris, soil, rock, and gravel removed from a project site shall be recycled or salvaged. In accordance with Chapter 20.87, Construction and Demolition Debris Recycling and Reuse, of the Los Angeles County Code, a Recycling and Reuse Plan (RRP) must be submitted to the County of Los Angeles Department of Public Works, Environmental Programs Division, after an application for a grading or building permit has been filed. The RRP must contain a project description and the estimated total weight of the project's construction and demolition (C&D) debris, with separate estimates for (1) soil, rock, and gravel; (2) other inert materials; and (3) all other project C&D debris.	The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process), and the contractor shall comply with this regulation during construction activities.	Less than significant

2.0 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

Segment C of the Park to Playa Trail would be located in the Blair Hills area of the City of Culver City. The proposed trail would run through the undeveloped BHRCA property that is located at the northern end of the Inglewood oilfield. The BHRCA property where Segment C is proposed is shown in Exhibit 2-1, Regional Location and Local Vicinity.

2.2 PROJECT BACKGROUND

Oil production in the Baldwin Hills started in 1924 and residential development in the area occurred in the late 1940s and the 1950s (CDMG 1982). Land acquisition for parks and open space started in the 1980s when the State of California initially acquired 500 acres of land in the Baldwin Hills in 1982 for a wilderness park. This land was later developed as the Kenneth Hahn State Recreation Area (KHSRA).

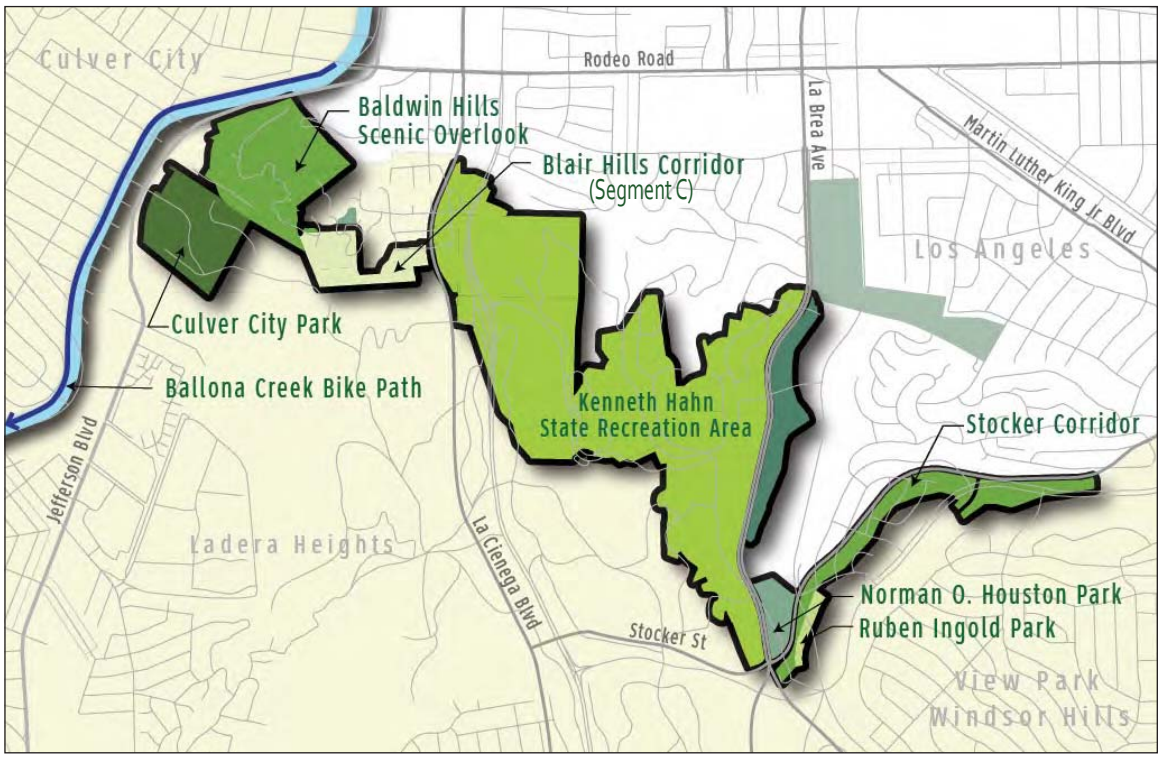
The Santa Monica Mountains Conservancy was established as a State agency in 1980 to preserve, protect, restore, and enhance urban, rural and river parks, open space, trails, and wildlife habitats throughout Southern California. In 1999, the Santa Monica Mountains Conservancy and the County of Los Angeles formed a Joint Powers Authority (JPA), known as the Baldwin Hills Regional Conservation Authority (BHRCA), to acquire, expand, and improve open space areas specifically in the Baldwin Hills; along the Ballona Creek; and in other natural and recreational areas in the Second Supervisorial District of the County of Los Angeles.

In 2000, the Baldwin Hills Conservancy was established as a State agency that would acquire open space and manage public lands in the Baldwin Hills area and provide recreation, restoration, and protection of wildlife habitat within its territory. The Conservancy formed a Baldwin Hills Park Advisory Committee to obtain direction and input for the Baldwin Hills Park Master Plan. This committee conceived the Park to Playa concept, a trail connection between the Ballona Wetlands and the Baldwin Hills. The concept included the development of a hiking trail from the parks and open spaces in the Baldwin Hills along Ballona Creek to the Ballona Wetlands and ultimately to the Marvin Braude Bike Trail along the shores of the Pacific Ocean.

In 2001, the State constructed the Baldwin Hills Scenic Overlook. Soon after, the County of Los Angeles acquired several undeveloped parcels in Blair Hills between the KHSRA and the Baldwin Hills Scenic Overlook. These parcels were later transferred to the BHRCA.

In 2002, the California Department of Parks and Recreation (CDPR) and the Baldwin Hills Conservancy adopted the Baldwin Hills Park Master Plan, which proposed a two-square-mile urban park encompassing the areas east and west of La Cienega Boulevard, with a pedestrian lane on the bridge connecting the two areas. The CDPR also approved the KHSRA General Plan Amendment that included proposals for future park amenities and improvements at the KHSRA, the Baldwin Hills Scenic Overlook, and undeveloped land in the Blair Hills Corridor.

In 2005, the Baldwin Hills Conservancy prepared the Access and Linkages Planning Study, which identified specific projects to enhance recreational amenities in parks at the Baldwin Hills. These projects included the Stocker Corridor Trail, the Eastern Gateway Entrance at the KHSRA, and a branding and signage plan that have since been implemented.



Source: Alta Planning + Design 2011

Regional Location and Local Vicinity

Exhibit 2-1

Segment C of the Park to Playa Trail

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In 2010, the Mountains Recreation and Conservation Authority[1] (MRCA) initiated the planning for the proposed Park to Playa Trail through preparation of a Feasibility Study and Wayfinding Plan. The western portion of the Park to Playa Trail consists of the Ballona Creek Bike Path in Culver City and the Marvin Braude Bike Path in Playa del Rey.

The eastern portion of the trail is proposed through the Baldwin Hills area, under a coordination effort between the MRCA; the CDPR; the City of Los Angeles Department of Recreation and Parks; the City of Los Angeles Department of Transportation; the City of Culver City; the Los Angeles County Department of Public Works, Watershed Management Division; the Los Angeles County Flood Control District; the Los Angeles County Department of Parks and Recreation; the Office of Second District Supervisor Mark Ridley-Thomas; the BHRCA; the Baldwin Hills Conservancy; the California State Coastal Conservancy; and the Santa Monica Bay Restoration Commission.

The MRCA conducted community meetings, an online survey, and trail and park user interviews to solicit input on the trail alignment for the Park to Playa Trail. The Park to Playa Trail Feasibility Study and Wayfinding Plan was completed in November 2011. The Plan identified improvements to existing trails; alignments needed to close gaps in the trail system; amenities to be provided along the trails; and facilities needed to improve wayfinding and develop a trail identity. The Plan also provided specific recommendations for trail design, phasing, and implementation.

The BHRCA then took over the design phase of the Park to Playa Trail and approved the proposed trail alignment and trail improvements for Segments A to B and D to I in May 2013. Additional community meetings were held in 2014 to redefine the alignment for Segment C and the new trail alignment is now ready for BHRCA consideration. Trail improvements proposed at some of these segments have been completed; others are currently under construction; and other segments will be under construction at a later date.

2.3 PROJECT AREA

The Baldwin Hills are a group of northwest-to-southeast trending hills in the West Los Angeles area, generally following the trace of the Newport-Inglewood Fault Zone. The hills consist of crystalline basement rocks that are overlain by late Quaternary[2] deposits of the Inglewood Formation, Baldwin Hills sandy gravel, Culver sand, Fox Hills relict paleosol, floodplain deposits, and artificial fill (CDMG 1982).

The hills are defined by deep gullies and canyons, with the northern section of the hills exhibiting steeper slopes than the southern section. The northern section has maximum slope angles of 25 degrees and maximum heights of 200 feet. Elevations range from 70 feet above mean sea level (msl) at the Ballona Creek Bike Path; 420 feet above msl at the Baldwin Hills Scenic Overlook; and 511 feet above msl at the top of the Eastern Ridgeline Trail in the KHSRA.

The Baldwin Hills are primarily located in unincorporated County land, with the northern edge being located in the City of Los Angeles. Land in the City of Los Angeles is to the north and east of the hills, with the City of Inglewood to the south and the City of Culver City to the west. The hills are used for active recreation; habitat restoration and preservation; and oil and gas exploration, production, processing, and associated activities. Vegetation in the area consists primarily of ornamental, ruderal, grasslands, and sage scrub vegetation.

[1] The MRCA is a local public agency exercising joint powers of the Santa Monica Mountains Conservancy, the Conejo Recreation and Park District, and the Rancho Simi Recreation and Park District.

[2] The Quaternary Period generally refers to the last 2.0 million years.

The Blair Hills is the northwestern section of the Baldwin Hills, southeast of the Ballona Creek. It is bound by Jefferson Boulevard, Rodeo Road, and La Cienega Boulevard and includes the Baldwin Hills Scenic Overlook, Culver City Park, a residential neighborhood, and the northern end of the Inglewood oilfield.

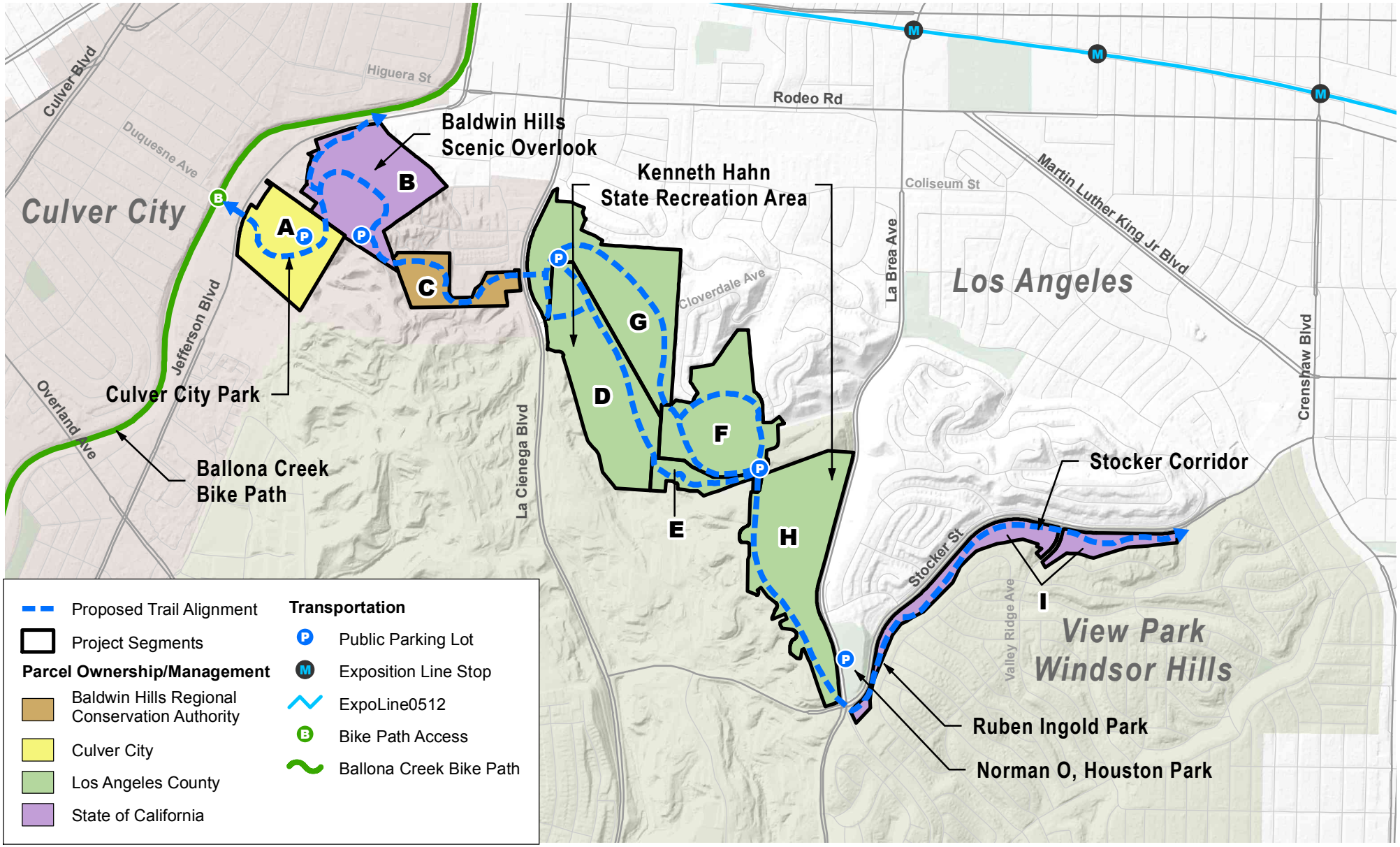
The Park to Playa Trail consists of 11 segments, with 2 segments (Marvin Braude Bike Path and Ballona Creek Bike Path) completed. The nine other segments consist of existing and proposed trails that pass through the northern section of the Baldwin Hills and surrounding areas. The trail alignment generally follows existing trails in public parks and open spaces, with a few segments representing new trails that would connect existing trails or close gaps in the trail system. Exhibit 2-2, Park to Playa Trail Corridor, shows the Park to Playa Trail and Table 2-1 lists the various segments.

TABLE 2-1
PARK TO PLAYA TRAIL SEGMENTS

Segment	Name	Location	Status
	Marvin Braude Bike Path	Playa del Rey	Completed
	Ballona Creek Bike Path	Along Ballona Creek in Culver City	Completed trail. Planned installation of wayfinding signage
A	Culver City Park	East of Jefferson Blvd	Planned improvements to existing trail
B	Baldwin Hills Scenic Overlook	East of Jefferson Blvd	Planned improvements to Hetzler Road and new wayfinding signage
C	**BLAIR HILLS CORRIDOR**	**WEST OF LA CIENEGA BLVD**	**NEW TRAIL**
D	Valley Trail	In KHSRA, east of La Cienega Blvd	Under construction
E	Hilltop Connector Trail	In KHSRA, east of La Cienega Blvd	Under construction
F	Janice's Green Valley Loop Trail	Janice's Green Valley in KHSRA	Under construction
G	Western Ridgeline Trail	In KHSRA, east of La Cienega Blvd	Under construction
H	Eastern Ridgeline Trail	In KHSRA, west of La Brea Avenue	Completed
I	Stocker Street Corridor	Slope along Stocker Street, east of La Brea Avenue	Under construction
KHSRA: Kenneth Hahn State Recreation Area			

The City limits of Culver City near Segment C run along La Cienega Boulevard to the east, Ivy Way and south of Bowcroft Street to the north, and one parcel south of the BHRCA property to the south. East of La Cienega Boulevard is the KHSRA, with a strip of land within the City of Los Angeles and areas farther east on unincorporated County land. The boundary between the Cities of Culver City and Los Angeles runs along the centerline of La Cienega Boulevard until approximately 200 feet south of an existing bridge over La Cienega Boulevard where the City boundaries separate to the east and west and the area to the south is part of the unincorporated County area.

The parks and open spaces in the Baldwin Hills and Blair Hills areas have varying landowners, management entities, and jurisdictions. Culver City Park is owned and operated by the City of Culver City and is located in Culver City. The Baldwin Hills Scenic Overlook (formerly called Vista Pacifica) is located in Culver City and is owned and operated by California Department of Parks and Recreation. As stated earlier, Segment C is proposed on BHRCA property in the City of Culver City. The KHSRA is a State Park located in the unincorporated area of the County and in the City of Los Angeles (northern end of KHSRA between La Cienega Boulevard and La Brea



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Park to Playa Trail Corridor

Exhibit 2-2

Segment C of the Park to Playa Trail

N W E S

2,000 1,000 0 2,000 Feet

BonTerra PSOMAS

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Avenue). The Stocker Street Corridor is also owned by the State of California and is located on unincorporated County land. An operating agreement between the State and County has been established to allow for long-term maintenance and operation of the KHSRA and Stocker Corridor, with the Los Angeles County Department of Parks and Recreation providing management and maintenance.

2.4 PROJECT SITE

Exhibit 2-3, Aerial Photograph, shows the BHRCA parcel and the surrounding area. The site is largely an undeveloped area where Lloyd owns the mineral rights and Freeport McMoRan Oil and Gas (FMO&G) has an access easement and drill site on the property. The eastern portion of the site is fenced as part of ongoing oil drilling operations to the south. The western portion serves as a retention basin for the Baldwin Hills Scenic Overlook, with a concrete-lined drainage channel from the basin extending north into Blair Hills Park. There is also a stone-lined open channel along the eastern end of the site, running north from the Lloyd Basin to an underground drainage line at the northeastern corner of the site, west of La Cienega Boulevard. There are dirt roads and utility lines crossing the site.

On-site vegetation includes California sagebrush scrub, California brittle bush, coyote brush scrub, needle grass grassland, toyon chaparral, giant wild rye grassland, giant reed stand, mulefat thicket, ruderal, and ornamental species.

Adjacent land uses include the Baldwin Hills Scenic Overlook to the northwest; single-family homes, Blair Hills Park, the Stoneview Nature Center (under construction), and an apartment building to the north; La Cienega Boulevard and the KHSRA to the east; oil and gas exploration, production, processing, and associated activities to the south and west; and Culver City Park farther west.

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Aerial Photograph

Exhibit 2-3

Segment C of the Park to Playa Trail

N W E S

250 125 0 250 Feet

BonTerra PSOMAS

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3.0 PROJECT DESCRIPTION

3.1 PROJECT OBJECTIVES

The BHRCA is seeking to accomplish the following objectives with the proposed Park to Playa Trail:

- To create a regional trail system and greenway by linking together and improving existing trail segments and building new trail segments within a series of public parks and open spaces.
- To allow users to follow the route by providing identity and wayfinding signage and markings, orientation signs/maps, and street crossing improvements.
- To restore native coastal scrub habitat in existing disturbed or ornamental landscape areas along the trail alignment.

These objectives also apply to Segment C. In addition, the specific objectives for Segment C include:

- To connect existing trails and recreational facilities in the Baldwin Hills and Blair Hills areas.
- To avoid disruption of adjacent oil and gas production facilities and activities.
- To limit disturbance of adjacent residential uses.
- To protect natural resources in the surrounding area.

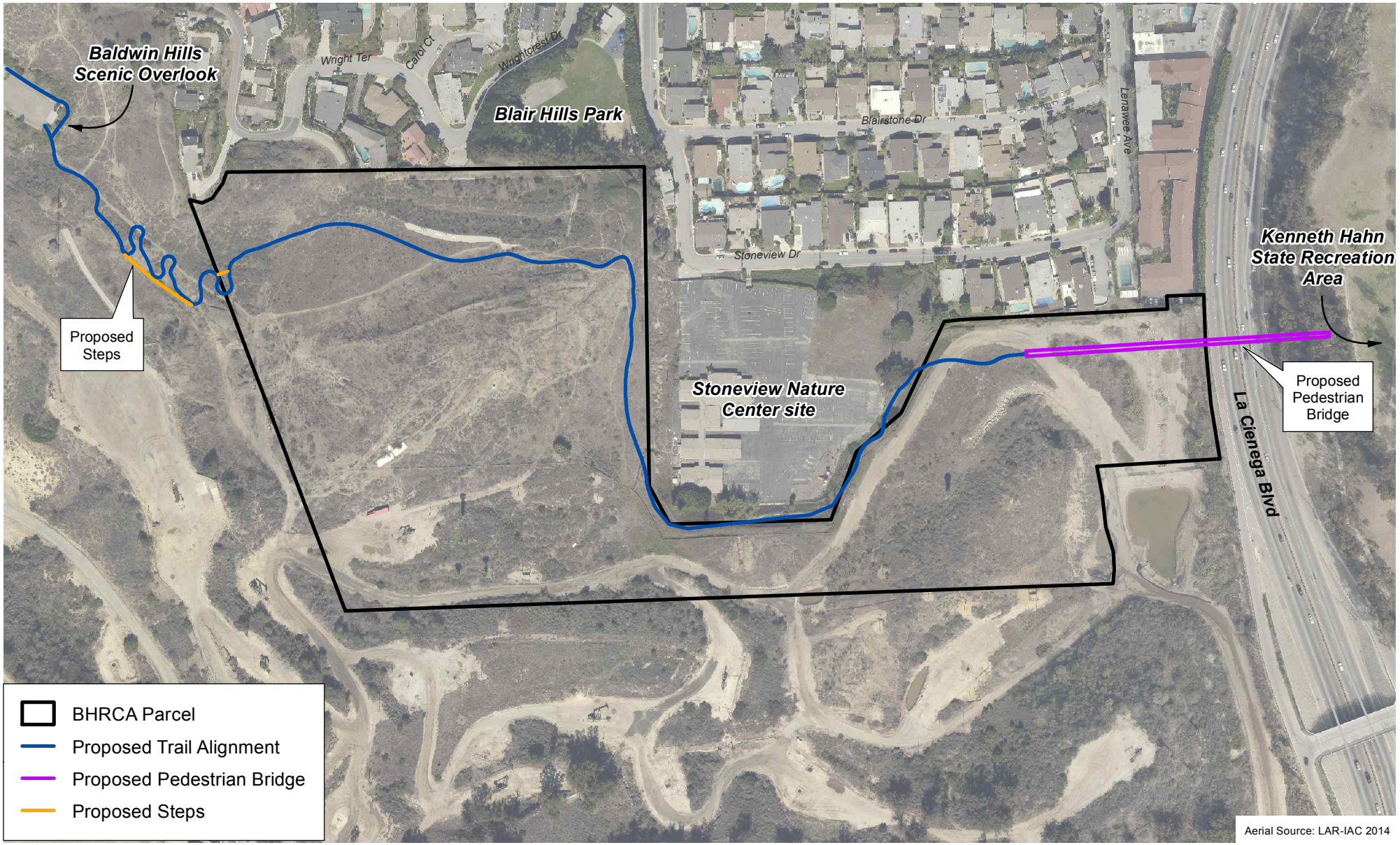
3.2 PROJECT DESCRIPTION

Segment C would connect the parks in the Baldwin Hills area to the Pacific Coast through the Ballona Creek Bike Path and Marvin Braude Bike Path. The proposed project designates the alignment for Segment C of the Park to Playa Trail that would connect the Baldwin Hills Scenic Overlook with the KHSRA (see Exhibit 3-1, Segment C Alignment). As shown, the western end of the Segment C trail would be located at the Baldwin Hills Scenic Overlook and the eastern end will consist of a pedestrian bridge over La Cienega Boulevard that would land at the KHSRA.

3.2.1 Proposed Trail Improvements

The project would create a new trail in the Blair Hills area. The proposed trail improvements would meet the minimum design standards for recreational trails, as contained in the Trail Manual developed by the Los Angeles County Department of Parks and Recreation and in compliance with the American with Disabilities Act (ADA) as it pertains to recreational trails. Specifically, a minimum six-foot-wide trail with a firm and stable surface (i.e., compacted native soil) would be provided. The trail would generally have a three percent to five percent cross slope to the outside/downhill edge to maintain proper drainage. Concrete steps would run up the slope from Segment C to the parking lot of the Baldwin Hills Scenic Overlook and a pedestrian bridge would be built over La Cienega Boulevard to connect the trail to the KHSRA.

The trail improvements on the BHRCA property would include identification, wayfinding and regulation signs; an interpretive node (e.g., information kiosk, benches, and trash can); a potential elevated boardwalk; landscaping with native plants and restoration of habitat in disturbed areas adjacent to the trail; access road relocation; new fencing and fence relocation; a CMU wall adjacent to select northern residential properties; water line relocation; and an irrigation system.



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Segment C Alignment

Exhibit 3-1

Segment C of the Park to Playa Trail

N W E S

250 125 0 250 Feet

BonTerra PSOMAS

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The proposed trail improvements would be constructed of concrete, stone, metal, and other materials that would minimize maintenance needs; deter vandalism; and limit fire damage. Existing fences along the trail could be planted with vines to block views of adjacent private residential properties and developments. Habitat restoration would incorporate native species (e.g., coastal sage scrub and other native trees, shrubs, and grasses) or drought-tolerant plants. Landscaped buffers would also be provided between the existing residences and the eastern section of the trail.

An elevated boardwalk (with safety railing) is proposed south of the former school site/ Stoneview Nature Center. A connection to the Stoneview Nature Center is also proposed at the eastern edge of the Center's property line. A gate would control access to Segment C from the Nature Center. This trail connection is intended for trail users who would like to stop off at the Center, once it is constructed and open, while walking along Segment C of the Park to Playa Trail.

An unpaved access road serving the active Inglewood oilfield would need to be relocated since the new trail would be constructed in the vicinity of the current access road alignment. An existing fence would also be relocated south of the proposed trail to separate the oil and gas exploration, production, processing and associated activities from the trail corridor. In addition, an existing water line would be relocated away from the trail alignment. Invasive non-native plants and palm trees in the eastern section of this area would be removed and replaced with native coastal scrub vegetation, and areas that are disturbed by the proposed trail and road realignment would be restored. An irrigation system would also be provided for trees that would be planted along the trail. A gate may be provided at the pedestrian bridge landing at the KHSRA to prevent use during the evening hours and at specific times.

A conceptual design for the pedestrian bridge has not been developed, since it would be awarded under a design-build contract. However, the County will review the final design for the proposed pedestrian bridge during the plan check process to ensure that the architecture and design meet the needs for utility, safety, and cost. At this time, only general parameters have been established, as discussed below.

The proposed bridge could be a box truss, bow truss, girder, arch, or suspension bridge and made of concrete, steel, aluminum, and/or wood. It would be approximately 8 to 20 feet wide and 13 to 35 feet high. The bridge deck would be approximately 18.5 feet above the elevation of La Cienega Boulevard. It would start at an elevation of approximately 240 feet above mean sea level (msl) at the KHSRA and extend directly west for approximately 565 feet and ending at the BHRCA property at about 191 feet above msl in an area south of the southern end of Lenawee Avenue. Switchback ramps or stairs may also be provided on each end of the bridge. Potential colors include shades of white, tan, green, gray, and metallic colors. The sides and top of the bridge will include open fencing or be completely enclosed. The range in the sizes, materials, colors, and types of the pedestrian bridge would provide flexibility to the design-build contractor to allow for innovative designs and the incorporation of public art into the bridge. Thus, final design may feature varied combinations of aesthetic elements in terms of form, size, color, texture, lighting, railing, and detail.

As part of the proposed pedestrian bridge, existing overhead utility lines on both sides of La Cienega Boulevard would be placed underground so as not to interfere with the bridge structure or pose hazards to bridge users. This will include approximately 600 feet of trenching on both shoulders of the street to place the lines underground, and to relocate streetlights, roadway signs, and transformers.

3.2.2 Construction Activities

The project would be awarded through a design-build contract. The construction of the trail improvements and pedestrian bridge may begin around June 2016 and end in October 2018. Construction staging areas would be located in parking areas and other paved areas in the Baldwin Hills Scenic Overlook, the KHSRA, and BHRCA property.

3.2.3 Operational Characteristics

The Segment C trail would be open and accessible at times when the Baldwin Hills Scenic Overlook and the KHSRA are open to public use. Signs are now posted stating that the parks are closed from dusk to dawn. This would apply to Segment C of the Park to Playa Trail. A gate at the pedestrian bridge landing at the KHSRA would be constructed to preclude trail use during the evening and nighttime hours.

It is expected that the same individuals who currently use the trails in the Baldwin Hills area (including the KHSRA, Culver City Park and Baldwin Hills Scenic Overlook) would use Segment C after project construction. These users include walkers, joggers, hikers, bicyclists, dog walkers, and roller bladers, with portions of the trail inaccessible to some users (i.e., handicapped persons, bicyclists, and leashed-dog walkers) due to the presence of steps, steeper terrain, or other management policies. Equestrians would continue to be prohibited from using the existing and proposed trails.

With Segment C connecting the Baldwin Hills Scenic Overlook with the KHSRA, trail use by area residents and other regional visitors is anticipated to increase over time. Existing and future users of the Ballona Creek Bike Path may also be diverted to the Park to Playa Trail through increased connections to the KHSRA and other local park amenities.

Maintenance of the proposed trail would be provided by the County of Los Angeles Department of Parks and Recreation, which provides maintenance to the KHSRA. Maintenance activities would include trash collection and disposal; trimming of vegetation; minor repaving of the trail surface; graffiti removal; upkeep of the pedestrian bridge; and replacement of signs, fences, benches, and related trail elements. The trail improvements at the Baldwin Hills Scenic Overlook would be subject to maintenance by California Department of Parks and Recreation's park maintenance workers. The trail improvements at the KHSRA would be maintained by the Los Angeles County Department of Parks and Recreation, as provided by the current maintenance crew at the maintenance yard in the park.

3.3 DISCRETIONARY ACTIONS

A discretionary action is a decision taken by a government agency that calls for the exercise of judgment in deciding whether to approve or deny a project. Discretionary approvals needed to implement Segment C of the Park to Playa Trail include:

BHRCA

- Approval of the proposed alignment and trail improvements for Segment C
- Relegate safety patrols to the County Sheriff's Department

While the BHRCA owns the property and will need to approve the implementation of the Segment C trail, it plans to hand over the construction of the Segment C trail to the County Department of Public Works and maintenance of the trail to the County Department of Parks and Recreation.

California Department of Parks and Recreation

- Approval of the proposed trail improvements in the Baldwin Hills Scenic Overlook
- Approval of the proposed pedestrian bridge at the KHSRA

County of Los Angeles

- Approval of the proposed trail improvements on the slopes of the Stoneview Nature Center property
- Approval of the proposed pedestrian bridge in the KHSRA

City of Los Angeles

- Approval of the pedestrian bridge in the KHSRA within City limits
- Approval of the pedestrian bridge over La Cienega Boulevard
- Approval of bridge-associated power line undergrounding activities

City of Culver City

- Approval of the pedestrian bridge over La Cienega Boulevard
- Approval of bridge-associated power line undergrounding activities

Other permits and approvals needed to implement the proposed trail improvements include:

- National Pollutant Discharge Elimination System (NPDES) General Construction Permit from the State Water Resources Control Board
- Grading and building permits from the City of Los Angeles and the City of Culver City
- Encroachment permits from the Cities of Los Angeles and Culver City for work within public rights-of-way (i.e., La Cienega Boulevard)
- Section 401 Water Quality Certification from the Los Angeles Regional Water Quality Control Board (RWQCB) for the potential impacts of the pedestrian bridge proposed over the drainage channel

Since this project is a joint effort of various local agencies, formal permit requirements could be waived.

4.0 ENVIRONMENTAL ANALYSIS

This section includes the completed CEQA environmental checklist form, which is used to evaluate the potential environmental impacts of Segment C of the Park to Playa Trail.

The environmental checklist form identifies the degree of impacts from Segment C on various environmental issues. A response on the potential impact of the project on each checklist question is provided. The existing setting is discussed below the checklist questions and an explanation of each checklist response follows. The mitigation program is then outlined, which includes regulatory requirements and mitigation measures that the project would need to implement.

1. Project Title:	**Segment C of the Park to Playa Trail**
2. Lead Agency Name and Address:	Baldwin Hills Regional Conservation Authority 5750 Ramirez Canyon Road Malibu, California 90265
3. Contact Person and Phone Number:	Matthew Feldhaus (626) 300-3262
4. Project Location:	Blair Hills and Baldwin Hills areas in the Cities of Los Angeles and Culver City in Los Angeles County
5. Project Sponsor's Name and Address:	Baldwin Hills Regional Conservation Authority 5750 Ramirez Canyon Road Malibu, California 90265
6. General Plan Designation:	City of Culver City: Low Density Multi-Family and Open Space; City of Los Angeles: Open Space
7. Zoning:	City of Culver City: Open Space and Residential Single Family; City of Los Angeles: Open Space

8. Description of the Project:

The BHRCA has redefined the alignment for Segment C of the Park to Playa Trail, which is a comprehensive trail system from the parks and open space areas in the Baldwin Hills. Segment C is the section of the proposed trail though Blair Hills that would connect the Baldwin Hills Scenic Overlook with the Kenneth Hahn State Recreation Area (KHSRA).

9. Surrounding Land Uses and Setting:

Land uses surrounding Segment C include public park areas; open spaces; and residential, commercial, and industrial areas. To the north are multi-family and single-family homes, a former school site (where the Stoneview Nature Center is under construction), and Blair Hills Park; to the east is the KHSRA; to the south are oil and gas exploration, production, processing and associated activities and the KHSRA; to the west are oil and gas exploration, production, processing and associated activities, the Baldwin Hills Scenic Overlook, and Culver City Park.

10. Other Public Agencies whose Approval is Required:

- California Department of Parks and Recreation
- County of Los Angeles
- City of Los Angeles
- City of Culver City

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

☒ Aesthetic/Visual	☐ Agriculture and Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Geology and Soils
☐ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials	☐ Hydrology and Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☒ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☒ Transportation/Traffic	☐ Utilities/Service Systems	☐ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	11-17-15 Date
Joseph T. Edmiston, FAICP Printed name	Baldwin Hills Regional Conservation Authority Lead Agency

4.1 AESTHETICS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

4.1.1 Environmental Setting

Visual Resources

The Baldwin Hills area is a prominent geologic feature in the West Los Angeles area and is visible from many public vantage points in the Los Angeles Basin. It is generally visible as a heavily landscaped open space area surrounded by urban development. Aside from the open space areas, oil wells and production areas are also visible from public vantage points near the hills. The Baldwin Hills Scenic Overlook and the KHSRA offer distant views of the Pacific Coast and Santa Monica Bay; the urban skylines in the Los Angeles Basin; and the mountains surrounding the basin (including the Santa Monica Mountains, Hollywood Hills, Verdugo Hills, San Gabriel Mountains, and Santa Ana Mountains).

Existing Views

Segment C is at a lower elevation than the Baldwin Hills Scenic Overlook and is only visible from the eastern edge of the overlook. The northwest section of Segment C is occupied by a detention basin (as defined by a relatively flat area bound by slopes on two sides and a concrete berm on the north side) with a V-ditch running from the basin east and north toward Blair Hills Park. A number of small hills are present, with a dirt road that provides access to the adjacent oil well pads and winds around a former school site toward La Cienega Boulevard. Another detention pond is located at the southeast end of this corridor, with an open channel running north from the pond and through the eastern section of the project site into a storm drain inlet near La Cienega Boulevard. Photographs of the BHRCA parcel are provided in Exhibit 4-1.

Residents, visitors, employees and other individuals in the Baldwin Hills and Blair Hills areas have views of the project site from public roads and adjacent residential and industrial land uses, as well as from nearby recreational areas and open spaces. The site for Segment C is largely seen as part of the Inglewood oilfield, where oil wells and associated structures are present. Viewers include travelers on La Cienega Boulevard and various individuals at the adjacent residences to the north, employees at the oilfield to the south, and users of the Baldwin Hills Scenic Overlook to the northwest and KHSRA to the east. Intervening structures and trees preclude views of the project site from areas farther from the site.

Looking South at the retention basin in the western section of Segment C.

Looking West at the dirt trail South of the retention basin.

Looking Southeast at the drainage channel West of La Cienega Boulevard.

Looking North at the storm drain inlet at the northeastern corner.

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Existing Views of Segment C

Exhibit 4-1

Segment C of the Park to Playa Trail

BonTerra PSOMAS

Scenic Highways

There are no officially designated State Scenic Highways near the site. The nearest eligible State Scenic Highway is the portion State Route (SR) 1, also known as Pacific Coast Highway, which runs west-northwest along the coast. The segment of SR-1 that is an eligible Scenic Highway begins at its intersection with SR-187/Venice Boulevard, and extends northwest, away from the site to SR-101 in Ventura County (Caltrans 2013). The site is located approximately 4.4 miles northeast of the intersection of SR-1 with SR-187.

The Conservation and Natural Resources Element of the County General Plan identifies Pacific Coast Highway (SR-1) as an Eligible Scenic Highway (County of Los Angeles 2015). The Blair Hills and Baldwin Hills are not visible from Pacific Coast Highway due to distance and the presence of intervening structures, trees, and landforms.

The City of Los Angeles Transportation Element designates Venice Boulevard as a Scenic Highway and Crenshaw Boulevard is designated as a Scenic Principal Major Highway (City of Los Angeles 1999). Venice Boulevard is located 1.0 mile west of the site, and Crenshaw Boulevard is located 2.2 miles east of the site.

Adjacent Open Spaces

- **Baldwin Hills Scenic Overlook.** Vehicle entry to the Baldwin Hills Scenic Overlook is provided by Hetzler Road as it winds up to the top of the hill from Jefferson Boulevard, with the trail from Culver City Park connecting to the road halfway up to the parking lot. Near Jefferson Boulevard is a dirt trail that heads east and switches back until it reaches the start of stone steps that lead directly up to the hill, with the trail continuing to switch back up the hill. Several other dirt trails are present in the area, with a paved observation deck, visitor center, and parking lot at the top. Views of the surrounding communities, the Los Angeles Basin, and the Pacific Ocean are available from the overlook.

- **Kenneth Hahn State Recreation Area.** Access to the KHSRA is provided by southbound and northbound on- and off-ramps at La Cienega Boulevard, with a bridge extending over La Cienega Boulevard toward the park entrance. The access road passes through the valley area of the KHSRA, between a fishing lake and the lower picnic area, with another road bending northwesterly toward the Japanese Garden. Several paved and unpaved (dirt) trails are present in the KHSRA, leading to various facilities within the park and run along the ridge.

4.1.2 Impact Analysis

a) Less than Significant Impact

The Baldwin Hills area is the only remaining large open space in the West Los Angeles area and serves as a scenic resource in a highly urbanized environment. The northern portion of the hills offers scenic views of undeveloped land supporting mature trees and native vegetation that contrasts with the industrial view of oil wells, oil production equipment, and unpaved dirt roads on the southern slopes. At the same time, the ridgelines and tops of the hills afford panoramic views of the Pacific Coast; the urban skyline of the Los Angeles Basin; and the surrounding mountains.

The Blair Hills area is developed with residential and industrial uses, parks and open space (Baldwin Hills Scenic Overlook and Culver City Park), and oil wells, oil production equipment, and unpaved dirt roads on the southern section.

During construction activities, Segment C would be visible as a highly disturbed area with construction equipment, construction materials, and construction crews on and near the site. While views of the site would change, views of the hillsides from the surrounding areas and of the Los Angeles Basin from the KHSRA and Baldwin Hills Scenic Overlook would remain unchanged. Since construction would affect a relatively small area (in comparison to the hills) and would be temporary, impacts would not be considered significant.

In the long term, the proposed at-grade trail, elevated boardwalk by the Stoneview Nature Center, and steps to the Baldwin Hills Scenic Overlook that are proposed at the western section of the site would be mostly visible to trail users and other individuals who are present on or near Segment C. Trail users, park visitors, and employees at the Baldwin Hills Scenic Overlook would also see the new trail and steps at the southeastern corner of this scenic overlook when they are at the upper parking lot or other areas at the eastern edge of the overlook. Since there are existing trails and steps at the overlook, the visual changes associated with Segment C would not be significant and adverse to existing viewers.

The eastern section of the site is at a lower elevation than the adjacent residential properties, with block walls/fences separating the site from the existing residences to the north. Residents of the apartment building on Lenawee Avenue and residents at the upper story windows of single-family residences on Stoneview Drive would see the proposed trail. While the proposed trail would improve the visual quality of the existing undeveloped land, the presence of trail users may present a sense of intrusion that was previously not occurring. Workers at the oil wells to the south may also see the trail users but not the proposed trail itself.

A 23- to 46-foot-wide landscaped area and fencing would be provided along the trail and there are existing block walls/fences and an easement that separate the adjacent residences from the trail. Thus, direct views into the yards of private residences would be obstructed. Distance, elevation differences, existing walls and proposed fencing, and existing and proposed landscaping between the trail and the residences are also expected to block direct views into the interior of the adjacent residences. The views of workers at the oil wells to the south would change from views of the undeveloped site and property walls along the residences to the north to views of the proposed fence and landscaping along the southern side of the trail. This would not be a significant impact.

Views of the hillsides by adjacent residents to the north would be obstructed by trees that would be planted along the trail. Chapter 9.12 of the Culver City Municipal Code outlines the view preservation regulations of the City, which serves to protect the existing views of property owners from unreasonable obstruction due to tree growth. The regulations call for restoration actions through trimming; thinning; crown reduction; topping; and/or removal of trees in hillside areas (including Hetzler/Tompkins, Blair Hills, and Culver Crest).

A greater concern for privacy has been expressed by the residents who live north of the proposed trail. To comply with their requests, a landscaped buffer will be provided along the trail to cover views of the trail from the residences and to block the views of trail users into adjacent residences. Thus, compliance with the City's requirement to preserve distant views would no longer be necessary.

The proposed pedestrian bridge over La Cienega Boulevard could block southerly and southeasterly views of the residents at the apartment complex on Lenawee Avenue and some residences along Stoneview Drive and La Cienega Boulevard. The proposed bridge would introduce a new element in these private views, but would not be the only component in these views. At the same time, the existing overhead power lines near the bridge would be placed underground. Thus, this impact would not be significant.

The views of trail users on the bridge would be limited due to the proposed visual screening (e.g., metal mesh) on the pedestrian bridge and ramp. Thus, view intrusion in adjacent residences would be limited.

The proposed bridge would also change the views of travelers on La Cienega Boulevard. There is an existing vehicular bridge over La Cienega Boulevard that leads into the KHSRA, south of the proposed bridge location. Thus, the proposed pedestrian bridge would be an additional visual intrusion across the roadway. However, travelers would only see the new pedestrian bridge for a few seconds as they pass this roadway segment. This transitory change in views would not be considered a significant impact. Views of the Baldwin Hills and Blair Hills will still be available several hundred feet before and after the proposed bridge and traveler views of the Verdugo Hills to the north would be blocked by the proposed bridge for a limited time, after which the hills would become visible once the traveler is north of the bridge.

Also, existing views of the Los Angeles Basin and the mountains surrounding the basin would remain available from the Baldwin Hills Scenic Overlook and the KHSRA. The Baldwin Hills would also remain visible from numerous public vantage points around the hills. In addition, the proposed elevated boardwalk along the trail would provide additional opportunities to see views of the surrounding hillsides. Thus, impacts to scenic vistas and resources would be less than significant.

b) No Impact

There are no State-designated or State-eligible scenic highways located near the site that may be affected by the proposed trail. Due to distance and intervening urban development, the site is not visible from Pacific Coast Highway, which is the nearest eligible State Scenic Highway and a County Scenic Highway. The site is also not visible from Venice Boulevard and Crenshaw Boulevard (City of Los Angeles Scenic Highways) due to the presence of intervening structures. Therefore, the proposed project would not affect scenic resources along a scenic highway and no impact would occur.

c) Less than Significant Impact

The existing visual character of the site would change with construction of the proposed Segment C trail. Existing views would be affected by short-term construction activities on the site, and would include views of disturbed soils, construction equipment and vehicles, staging areas, grading and excavation, and construction and landscaping activities. These impacts to the visual quality of the area would be short-term and temporary and would not be considered significant.

In the long-term, views of the at-grade trail is not expected to be considered a degradation of visual quality since the trail would have a compacted soil surface and landscaping that would be provided along the trail would block views of the proposed fencing and trail and views between users of the trail and the adjacent residences. The proposed elevated boardwalk south of the Stoneview Nature Center would only be visible from areas to the south of the site. The proposed steps east of the overlook would not be highly visible since it would be located along the slope and away from public roads.

On the other hand, the proposed pedestrian bridge has the potential to change the visual character of the area around La Cienega Boulevard as the bridge would be visible from the KHSRA, La Cienega Boulevard, the Inglewood oilfield, and adjacent residences. Depending on the final design for the bridge, it could be a relatively small structure or a large, imposing element. Since the perception of visual quality is highly subjective, the pedestrian bridge design may be attractive to one person but not to another. Thus, it is likely that some viewers would perceive the proposed bridge as a degradation of the visual character of the area while others would perceive

it as an aesthetic feature in the landscape. Complete consensus is not likely to be attained, but the proposed bridge design would be subject to design review by the County Department of Public Works as part of the plan check process. During this review, it is anticipated that the County's collective aesthetic preferences would be reflected in the approved bridge design, such that visual degradation would not occur. Courtesy reviews would also be provided to the Cities of Los Angeles and Culver City. Thus, it is anticipated that the proposed bridge would have a visual quality that would not be considered a substantial degradation of the character of the site or surrounding area.

While there would be visual changes as a result of the proposed pedestrian bridge, these changes would not substantially degrade the visual character or quality of the Baldwin Hills and Blair Hills. Therefore, the project would result in less than significant adverse impacts on visual quality.

d) Less than Significant Impact after Mitigation

Lighting of the trail and pedestrian bridge is not planned since it will not be in use from dusk until dawn, but the installation of new light sources on the pedestrian bridge and trail may be necessary for security and safety purposes. While there are existing streetlights on La Cienega Boulevard that characterize lighting levels in the area, any new light sources from the proposed trail and pedestrian bridge have the potential to increase nighttime lighting levels and adversely affect residents in dwelling units that have windows facing east to La Cienega Boulevard and south to Segment C. MM 4.1-1 shall require that any new light sources be provided at the minimum levels to meet security purposes; be directed downward and away from adjacent residential areas; and be shielded, diffused, or indirect to prevent spillover into adjacent properties. Also, no flashing, flickering, rotating, or moving lights shall be used. The design-build contractor shall provide data or studies to support compliance with this MM, which will be verified by the County during the plan check process.

Depending on the final design, the pedestrian bridge may be built of concrete, steel, aluminum, and/or wood and be painted in shades of whites, tans, browns, greens, grays, or metallic colors. The metallic colors are reflective and have the potential to create glare. The amount of glare would depend on the light source (e.g., sun) and surface reflectivity, including the size, texture, and reflective index of the reflecting surface and the amount of light and angle of reflection. Thus, the final bridge design and material finishes would be major factors in the potential creation of substantial glare that may result in flash blindness[3] and adversely affect drivers on La Cienega Boulevard, the bridge to the KHSRA, and nearby roads, as well as residents and other individuals in the surrounding area.

MM 4.1-2 requires that exterior bridge finishes that include glass, metals or mirrors be painted, tinted, and/or textured so as not to cause glare or flash blindness. The design-build contractor shall provide information on bridge finishes to show compliance with this MM, which will be verified by the County during the plan check process.

Implementation of MM 4.1-1 and MM 4.1-2 would reduce potentially significant adverse impacts related to light and glare to less than significant levels.

4.1.3 Mitigation Measures

MM 4.1-1 Any new light sources that would be installed as part of the project shall provide the minimum lighting levels to meet security and safety purposes; shall be directed downward and away from adjacent residential areas; and shall be shielded,

[3] Temporary visual interference that persists after the source of illumination has ceased.

diffused, or indirect to prevent spillover into adjacent residential properties. Also, no flashing, flickering, rotating, or moving lights shall be allowed.

The design-build contractor shall prepare a photometric study that shows the proposed light sources and resulting lighting levels to determine if light spillover will extend into adjacent residential properties. If light spillover will occur, the light sources shall be replaced, redesigned, and/or relocated until no light spillover into adjacent residential properties would occur. The lighting plan and results of the photometric study shall be submitted to the Los Angeles County Department of Public Works as part of the plan check process. Upon approval of the photometric study and the project's lighting plan by the County, the project shall be implemented in compliance with the lighting plan.

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

The design-build contractor shall submit information on bridge finishes to show compliance with this measure to the Los Angeles County Department of Public Works (as part of the plan check process) for County approval prior to the commencement of any construction activities.

4.1.4 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impact related to aesthetics would occur with the implementation of MMs 4.1-1 and 4.1-2.

The impacts of Segment C on aesthetics would be greater than the impacts of the Park to Playa Trail (as discussed in the previous IS/MND) due to the proposed pedestrian bridge over La Cienega Boulevard that was not included in the previous proposal for Segment C. Implementation of MMs 4.1-1 and 4.1-2 would reduce the impacts of Segment C to less than significant levels.

4.2 AGRICULTURE AND FORESTRY RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

4.2.1 Environmental Setting

Farmland

The Baldwin Hills, Blair Hills, KHSRA and surrounding area are located in a highly urbanized environment in the West Los Angeles area of Los Angeles County. There are no agricultural uses in the Blair Hills, Baldwin Hills, or along the proposed trail alignment for Segment C in Culver City. There are no tree nurseries or other agriculture-related uses in the area.

The California Department of Conservation administers the Farmland Mapping and Monitoring Program (FMMP) pursuant to Section 65570 of the *California Government Code.* Due to the predominance of urban development in the southern and central portions of Los Angeles County (where Segment C would be located), this area was not included in the mapping effort by the FMMP (FMMP 2015). As such, there are no designated farmlands in or near the Blair Hills or KHSRA.

Forests

While there are numerous mature trees in the KHSRA, these trees are not used for growing or harvesting timber. Thus, the project area is not considered timberland. Also, the project area is not designated as Forest Land in the Fire and Resource Assessment Program by the California Department of Forestry and Fire Protection (CAL FIRE 2011b). In 1984, the Olympic Forest was created in the KHSRA (in an area east of La Cienega Boulevard and north of the KHSRA entrance) through the planting of representative tree species from each nation that came to the 1932 Olympic Games, during which Olympic athletes were housed at the nearby Olympic Village

(now View Park). However, the Olympic Forest is not considered a natural forest. The other trees in the ornamental gardens, picnic areas, slopes, and various locations within the KHSRA do not represent a forest.

4.2.2 Impact Analysis

a, b, e) No Impact

Segment C would not directly convert agricultural land to non-agricultural uses because there are no agricultural activities or FMMP-designated Farmland in or near Blair Hills, KHSRA, or along the proposed trail alignment for Segment C. Additionally, the trail alignment and the surrounding areas are not under a Williamson Act Contract. Segment C would not cause changes in the environment that could indirectly result in the conversion of farmland to non-agricultural uses since there are no agricultural activities on adjacent lands. No impact would occur.

c, d) No Impact

The Blair Hills and KHSRA do not contain native trees that are part of a forest or that may be considered timberland. No impact on timberland or forestry resources would occur with Segment C. Although gum trees would be removed from the slopes of the KHSRA, these trees do not form a forest. Disturbed areas will be revegetated and trees would be planted along the trail to buffer and visually screen the trail from adjacent residences to the north. Also, no conversion of forest land or impacts on forestry resources would occur with the project, and there would be no impact.

4.2.3 Mitigation Measures

No impact related to agricultural or forest resources would occur; therefore, no mitigation is required.

4.2.4 Comparison of Impacts with Park to Playa Trail IS/MND

No impact related to agricultural or forest resources would occur with implementation of Segment C. This finding is similar to the analysis in the previous IS/MND for the Park to Playa Trail.

4.3 AIR QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 Environmental Setting

Baldwin Hills is located in an urban area of the Los Angeles County portion of the South Coast Air Basin (SoCAB), which, for air quality matters, is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Both the State of California and the U.S. Environmental Protection Agency (USEPA) have established health-based Ambient Air Quality Standards (AAQS) for air pollutants, which are known as “criteria pollutants”. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. The AAQS for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), inhalable particulate matter with a diameter of 10 microns or less (PM10), fine particulate matter with a diameter of 2.5 microns or less (PM2.5), and lead are shown in Table 4-1 below.

TABLE 4-1
CALIFORNIA AND NATIONAL AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary[a]	Secondary[b]
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.075 ppm (147 µg/m^3)	Same as Primary
PM10	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
PM2.5	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
NO_2	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary
	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
SO_2	24 Hour	0.04 ppm (105 µg/m^3)	–	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	
Visibility Reducing Particles	8 hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	**No Federal Standards**	
Sulfates	24 Hour	25 µg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)		

O_3: ozone; ppm: parts per million; µg/m^3: micrograms per cubic meter; PM10: respirable particulate matter; AAM: Annual Arithmetic Mean; –: No Standard; PM2.5: fine particulate matter; CO: carbon monoxide; mg/m^3: milligrams per cubic meter; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; km: kilometer.

[a] *National Primary Standards:* The levels of air quality necessary, within an adequate margin of safety, to protect the public health.

[b] *National Secondary Standards:* The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

Note: More detailed information in the data presented in this table can be found at the CARB website (www.arb.ca.gov).

Source: CARB 2013.

Regional air quality is defined by whether the area has attained or not attained State and federal air quality standards, as determined by air quality data from various monitoring stations. Areas that are considered to be “Nonattainment” are required to prepare plans and implement measures that will bring the region into “Attainment”. When an area has been reclassified from nonattainment to attainment for a federal standard, the status is identified as a “Maintenance” area, and there must be a plan and measures established that will keep the region in attainment for the next ten years.

The USEPA designates an area as "Unclassifiable" if, based on available information, the area cannot be classified as either meeting or not meeting the national primary or secondary ambient air quality standard for the pollutant. For the California Air Resources Board (CARB), an "Unclassified" designation indicates that the air quality data for the area are incomplete and do not support a designation of attainment or nonattainment.

Table 4-2 summarizes the attainment status of the SoCAB for the criteria pollutants.

TABLE 4-2
CRITERIA POLLUTANT DESIGNATIONS IN THE SOUTH COAST AIR BASIN

Pollutant	State	Federal
O_3 (1-hour)	Nonattainment	No Standard
O_3 (8-hour)		Extreme Nonattainment
PM10	Nonattainment	Attainment/Maintenance
PM2.5	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Attainment/Maintenance
SO_2	Attainment	Attainment
Lead	Attainment	Nonattainment/Attainment[a]
Visibility-Reducing Particles	Unclassified[b]	No Standards
Sulfates	Attainment	
Hydrogen Sulfide	Unclassified	

O_3: ozone; PM10: respirable particulate matter with a diameter of 10 microns or less; PM2.5: fine particulate matter with a diameter of 2.5 microns or less; CO: carbon monoxide; NO_2: nitrogen dioxide; SO_2: sulfur dioxide; CARB: California Air Resources Board; SoCAB: South Coast Air Basin

[a] Los Angeles County is classified as nonattainment for lead; the remainder of the SoCAB is in attainment of State and federal standards.

[b] "Unclassified" designation indicates that the air quality data for the area are incomplete and do not support a designation of attainment or nonattainment.

Source: CARB 2015

4.3.2 Impact Analysis

a) No Impact

Air quality in Los Angeles County is partially regulated by the SCAQMD, which is the agency principally responsible for comprehensive air pollution control in the SoCAB. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a sequence of Air Quality Management Plans (AQMPs).

On December 7, 2012, the SCAQMD Governing Board adopted the 2012 AQMP, which is a regional and multi-agency effort (including participation by SCAQMD, CARB, the Southern California Association of Governments [SCAG], and the USEPA). The purpose of the 2012 AQMP is to set forth a comprehensive program that will lead the region into compliance with federal air quality standards for 8-hour O_3 and PM2.5. The 2012 AQMP incorporates the latest scientific and technical information and planning assumptions, including the 2012 Regional Transportation

Plan/Sustainable Communities Strategy (RTP/SCS); updated emission inventory methodologies for various source categories; and SCAG's latest growth forecasts.

The two principal criteria for conformance to an AQMP are:

1. Whether the project would result in an increase in the frequency or severity of existing air quality violations; cause or contribute to new violations; or delay timely attainment of air quality standards and

2. Whether the project would exceed the assumptions in the AQMP.

With respect to the first criterion, the analyses in Responses to Questions 4.3b and 4.3c below, demonstrate that Segment C would not (1) generate short-term or long-term emissions of volatile organic compounds (VOCs), oxides of nitrogen (NOx, which are O_3 precursors), or PM2.5 that could potentially cause an increase in the frequency or severity of existing air quality violations in the SoCAB; (2) cause or contribute to new violations; or (3) delay timely attainment of air quality standards.

With respect to the second criterion, the project would not increase or modify SCAG's population, housing, or employment projections. The project would only create a new trail between two existing trails, with a bridge over La Cienega Boulevard. Therefore, the project is considered consistent with the region's AQMP. No impacts would occur and no mitigation is required.

b) Less Than Significant Impact

The SCAQMD establishes significance thresholds to assess the regional impact of project-related air pollutant emissions in the SoCAB. Table 4-3 summarizes the SCAQMD's mass emissions thresholds, which are presented for both long-term operational and short-term construction emissions. A project with emissions below these thresholds is considered to have a less than significant effect on air quality.

TABLE 4-3
SCAQMD CRITERIA POLLUTANT
MASS EMISSIONS SIGNIFICANCE THRESHOLDS

Criteria Pollutant	Construction	Operation
VOC	75 pounds/day	55 pounds/day
NOx	100 pounds/day	55 pounds/day
CO	550 pounds/day	550 pounds/day
SOx	150 pounds/day	150 pounds/day
PM10	150 pounds/day	150 pounds/day
PM2.5	55 pounds/day	55 pounds/day
VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM10: inhalable particulate matter with a diameter of 10 microns or less; $PM_{2.5}$: fine particulate matter with a diameter of 2.5 microns or less. Source: SCAQMD 2015.		

Construction Emissions

In order to calculate construction emissions for Segment C, conservative assumptions were made for construction details of the proposed bridge over La Cienega Boulevard. Construction of the

proposed trail in Segment C is assumed to start and end in 2016, as a conservative assumption, but maximum daily emissions would not significantly change or increase if construction occurs at a later date due to anticipated decreases in emissions associated with the use of newer construction equipment. Grading would require the export of at least 2,000 cubic yards of excavated soil. Although the majority of work on the trail alignment would be completed by hand tools, diesel-engine driven construction and material-handling equipment would be used for grading; movement of building materials; asphalt paving; and construction of the pedestrian bridge.

Regional Construction Emissions

Criteria pollutant emissions would occur during construction from operation of construction equipment; generation of fugitive dust from grading and earth-moving activities; and emissions from vehicles used to transport construction materials and driven to and from the site by construction workers. Project-generated construction emissions were estimated using the California Emission Estimator Model (CalEEMod) Version 2013.2.2 computer program (SCAQMD 2013), which is designed to model construction emissions for land development projects and allows for the input of project- and County-specific information.

The CalEEMod model input was based on the construction assumptions described above. Where specific information was not known, engineering judgment and default CalEEMod settings and parameters were used. The model inputs include estimated equipment use (e.g., forklifts and loaders) for each construction phase and the duration of each phase. The model also includes dust-control measures corresponding to the requirements of SCAQMD Rule 403, Fugitive Dust (see RR 4.3-1). Table 4-4 presents the estimated maximum daily emissions for project construction, and compares the estimated emissions with the SCAQMD daily mass emission thresholds.

TABLE 4-4
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS
(POUNDS/DAY)

Year	VOC	NOx	CO	PM_{10}	$PM_{2.5}$
	Emissions (pounds/day)				
2016	8	40	29	5	3
SCAQMD Thresholds	*75*	*100*	*550*	*150*	*55*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**

VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; PM_{10}: respirable particulate matter with a diameter of 10 microns or less; $PM_{2.5}$: fine particulate matter with a diameter of 2.5 microns or less

Note: Construction emissions were calculated using a shorter time frame as a worst case. With the longer construction period, short-term emissions would be the same or less.

Source: SCAQMD 2011b (thresholds); CalEEMod data can be found in Appendix A.

As shown in Table 4-4, construction-related emissions generated by the project would be less than the SCAQMD regional thresholds of significance. Therefore, construction emissions would be less than significant and mitigation is not required.

The bridge will be either prefabricated or built-in place. A crane will likely be necessary on both KHSRA and BHRCA land. The footing size cannot be determined since foundation design is site-specific and dependent on the geotechnical design. Based on similar bridges, the foundations will likely be 8 to 12 feet wide by 12 to 18 feet high by 18 to 30 feet long. Deep foundations (e.g., caissons, piles, piers) may also be required, depending on soil conditions. Since the

excavation volume cannot be determined until there is a specific geotechnical design, based on similar bridges, there is expected to be 1,000 to 2,000 cubic yards of excavation volume. To provide a conservative estimate, the assumptions for air quality emissions were based on the export of 25 truckloads (400 cubic yards) per day.

Localized Construction Emissions

In addition to the mass daily emissions thresholds established by SCAQMD, short-term local impacts to nearby sensitive receptors from on-site emissions of NO_2, CO, PM10, and PM2.5 are examined based on SCAQMD's localized significance thresholds (LST) methodology. To assess the local air quality impacts of projects without complex dispersion modeling, the SCAQMD developed screening (lookup) tables to assist lead agencies in evaluating impacts.

For the purposes of an LST analysis, the SCAQMD considers receptors where it is possible that an individual could be subject to 1 hour for NO_2 and CO exposure and 24 hours for PM exposure. The lookup table emission limits are based on the AAQS listed in Table 4-1. The closest receptors to the proposed trail include several residences within 25 meters (or 82 feet) north of the trail alignment. Other homes are approximately 25 meters from the alignment at the western end.

Table 4-5 shows the maximum daily on-site emissions for construction activities compared with the SCAQMD thresholds for local pollutants with receptors at 25 meters (82 feet) from the source; the SCAQMD methodology prescribes the use of the 25-meter factor for all receptors within 25 meters. Thresholds for a one-acre site are the most conservative.

TABLE 4-5
LOCAL SIGNIFICANCE THRESHOLD CONSTRUCTION EMISSIONS

	NOx	**CO**	**PM_{10}**	**$PM_{2.5}$**
	Emissions (pounds/day)			
Construction maximum daily on-site emissions	7	29	4	3
LSTs (1-acre site; 25-meter receptor distance)	*103*	*562*	*4*	*3*
Exceeds Threshold?	**No**	**No**	**No**	**No**

NOx: nitrogen oxides; CO: carbon monoxide; PM_{10}: particulate matter with a diameter of 10 microns or less; $PM_{2.5}$: particulate matter with a diameter of 2.5 microns or less; LST: localized significance threshold

Note: Data is for SCAQMD Source Receptor Area 2, Northwest Coastal Los Angeles County.

Source: SCAQMD 2009 (thresholds). CalEEMod data can be found in Appendix A.

As shown in Table 4-5, the local emissions from construction of the project would not exceed the SCAQMD thresholds. Therefore, local construction emissions would be less than significant, and no mitigation is required.

Operational Emissions

The SCAQMD has also established significance thresholds to evaluate potential impacts associated with long-term project operations. Long-term air pollutant emissions come from mobile sources, stationary sources, and area sources. Mobile-source emissions are associated with vehicular travel and are a function of the number of vehicle miles traveled (VMT). Stationary sources include electric power plants, phosphate processing plants, pulp and paper mills, and municipal waste incinerators. Minor sources include asphalt plants, concrete batch plants, and bulk gasoline plants. Area source emissions are air pollutants emitted from many individually small activities such as gasoline service stations, small paint shops, and consumer use of

solvents. Area sources also include open burning associated with agriculture, forest management, and land-clearing activities.

Regional Operational Emissions

The proposed trail would promote bicycle use and walking/hiking and may increase the number of vehicles coming to and from the parks and open space areas in the Baldwin Hills. However, these trips would be recreational in purpose (occurring mainly on weekends and/or outside peak hour traffic) and would likely include the use of other existing trails in the area. Thus, new trips cannot be attributed only to the use of the proposed trail. The potential increase in vehicle trips due to the project cannot be easily quantified and any increase in mobile-source emissions in the area is expected to be minimal.

Localized Operational Emissions

In an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found close to congested intersections. The project is not expected to result in a major increase in vehicle trips, nor would the project cause changes in weekday peak hour traffic volumes. Thus, local intersections would not be affected by the project, and there would be no impacts resulting in or contributing to CO hot spots.

As discussed above, no new on-site stationary sources are proposed as part of Segment C. As such, no localized operational impacts from criteria pollutants would occur.

The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. In addition, typical sources of acutely and chronically hazardous toxic air contaminants (TAC) include industrial manufacturing processes; automotive repair facilities; and dry cleaning facilities. Since the project does not propose these uses, a health risk assessment is not warranted. Potential project-generated air toxic impacts that may be generated by construction equipment would be short-term and less than significant. No mitigation measures are necessary.

c) Less than Significant Impact

The Los Angeles County portion of the SoCAB is a nonattainment area for O_3, NO_2, PM10, and PM2.5.[4] The project would generate these pollutants during the construction of trail improvements and pedestrian bridge. As shown in Table 4-4, construction emissions would not exceed SCAQMD significance thresholds.

Short-term cumulative impacts related to air quality could occur if project construction and nearby construction activities were to occur simultaneously. In particular, with respect to local impacts, cumulative construction particulate (i.e., fugitive dust) impacts are considered when projects are located within a few hundred yards of each other. Construction of the Stoneview Nature Center is expected to be completed before this project begins construction. Also, the surrounding area is largely developed and there are no nearby vacant parcels. Thus, no construction projects are expected within a few hundred yards of the proposed trail alignment that would occur concurrently with the project. Therefore, construction emissions of nonattainment pollutants would not be cumulatively considerable and project impacts would be less than significant.

[4] Los Angeles County is also a nonattainment area for lead. However, analysis of lead emissions impacts is limited to projects that emit significant quantities of the pollutant (e.g., battery manufacturers and lead smelters) and is generally not undertaken for park development projects.

d) Less than Significant Impact

As described in Response 4.3(b) above, Segment C would not result in any substantial CO hotspot or TAC air pollution impacts, and construction emissions would be less than the LST emissions thresholds. Therefore, the project would not expose any nearby sensitive receptors to substantial pollutant concentrations. The project would have less than significant impacts on sensitive receptors. No mitigation is required.

e) Less than Significant Impact

The proposed trail improvements would not generate objectionable odors, which are generally associated with agricultural activities; landfills and transfer stations; the generation or treatment of sewage; the use or generation of chemicals; and food processing.

Construction equipment and activities may generate odors from diesel exhaust emissions, painting, and paving operations. There may be situations where construction odors would be noticeable by local residents, nearby park users, and other nearby individuals, but these odors would not be unfamiliar or necessarily objectionable. The odors would be temporary and would dissipate rapidly from the source with an increase in distance. Therefore, the impacts would be short-term and would not be objectionable to a substantial number of people.

Limited amounts of trash in the trash receptacles are anticipated from trail use. These receptacles would be subject to regular maintenance, including the collection of trash for off-site disposal. Odors from these receptacles would not be offensive to a substantial number of people. There would be a less than significant impact and no mitigation is required.

4.3.3 Regulatory Requirements

RR 4.3-1 Project construction shall comply with the South Coast Air Quality Management District's (SCAQMD's) Rule 403, Fugitive Dust, which requires the implementation of best available control measures (BACMs) for any activity or man-made condition capable of generating fugitive dust including, but not limited to, earth-moving activities; construction/demolition activities; disturbed surface area; or heavy- and light-duty vehicular movement. The BACMs include incorporating soil stabilization measures; watering surface soils and crushed materials; covering hauls or providing freeboard; preventing track-out; limiting vehicle speeds; and wind barriers, among others.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to the approval of the County), and the contractor shall comply with this regulation during construction activities.

4.3.4 Mitigation Measures

With compliance with RR 4.3-1, Project implementation would result in less than significant impacts on air quality; therefore, no mitigation is required.

4.3.5 Comparison of Impacts with Park to Playa Trail IS/MND

No adverse impact related to air quality would occur with compliance with RR 4.3-1. Impacts of Segment C on air quality would be similar to the impacts of the Park to Playa Trail, as discussed in the previous IS/MND.

4.4 BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Surveys for the Park to Playa Trail were originally conducted in 2012 and included a general biological resources assessment (BonTerra 2012a), jurisdictional assessment (BonTerra 2012b), and focused surveys for special status plant species (BonTerra 2012c) and coastal California gnatcatcher (*Polioptila californica californica*) (Leatherman BioConsulting 2012). Focused surveys for coastal California gnatcatcher were also conducting during the 2014 non-breeding season (BonTerra Psomas 2015).

The general biological resources and focused surveys were updated in 2015 for Segment C of the Park to Playa Trail; the findings of these surveys are provided below. The survey area consists of Segment C of the Park to Playa Trail, including the footprint of a proposed bridge over La Cienega Boulevard and undergrounding of utility lines along La Cienega Boulevard. BonTerra Psomas Senior Biologists Allison Rudalevige and Lindsay Messett conducted a general survey to describe and map the vegetation types in the survey area on April 16, 2015. Focused surveys for special status plant species were conducted by Ms. Rudalevige concurrent with the general survey and a second survey visit was conducted on June 25, 2015 (see Appendix B1). Focused surveys for breeding coastal California gnatcatcher were conducted by Ms. Messett on March 19, 26, and April 3, 16, 23, and 30, 2015 (see Appendix B2).

Prior to performing the 2015 surveys, BonTerra Psomas updated the literature review to identify special status species reported from the vicinity of the survey area. Sources reviewed include the

U.S. Geological Survey's (USGS') Beverly Hills, Hollywood, Los Angeles, South Gate, Inglewood, and Venice 7.5-minute quadrangles in the California Native Plant Society's (CNPS') Locational Inventory of Rare and Endangered Vascular Plants of California (CNPS 2015) and the CDFW's California Natural Diversity Database (CNDDB) (CDFW 2015).

4.4.1 Environmental Setting

Vegetation

Vegetation types in the survey area consist of California sagebrush scrub, disturbed California sagebrush scrub, California brittle bush–California sagebrush scrub, California brittle bush–California sagebrush–coyote brush scrub, coyote brush scrub/needle grass grassland, disturbed toyon chaparral, giant wild rye grassland, needle grass grassland, annual brome–wild oats grassland, giant reed stand, ruderal, disturbed mulefat thicket, and ornamental; disturbed and developed areas are also present (Table 4-6; see Exhibit 4-2, Biological Resources).

TABLE 4-6
VEGETATION TYPES AND OTHER AREAS

Vegetation Type/Other Area	Area in acres
California sagebrush scrub	3.75
Disturbed California sagebrush scrub	0.65
California brittle bush–California sagebrush scrub	6.10
California brittle bush–California sagebrush–coyote brush scrub	0.47
Coyote brush scrub/needle grass grassland	1.31
Disturbed toyon chaparral	0.57
Giant wild rye grassland	0.91
Needle grass grassland	0.77
Annual brome–wild oats grassland	4.15
Giant reed stand	0.05
Ruderal	1.53
Disturbed mulefat thicket	0.38
Ornamental	2.09
Disturbed	3.76
Developed	1.41
Total	**27.90**

California Sagebrush Scrub. California sagebrush scrub occurs on slopes in two large areas in the southern portion of the survey area. This vegetation type is dominated by California sagebrush (*Artemisia californica*) with other scattered shrubs such as goldenbush (*Ericameria* sp.). The understory is dominated by ripgut grass (*Bromus diandrus*).

Disturbed California Sagebrush Scrub. Disturbed California sagebrush scrub occurs along the access road at the southern edge of the survey area. The species composition is similar to that of California sagebrush scrub, but includes a higher cover of non-native species such as castor bean (*Ricinus communis*), crown daisy (*Glebionis coronaria*), freeway iceplant (*Carpobrotus edulis*), and Brazilian pepper tree (*Schinus terebinthifolius*).

California Brittle Bush–California Sagebrush Scrub. California brittle bush–California sagebrush scrub occurs on the slopes in the western half of the survey area. This vegetation type

Aerial Source: LAR-IAC 2011

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Biological Resources

Exhibit 4-2

Segment C of the Park to Playa Trail

N W E S

180 90 0 180

Feet

Bonterra PSOMAS

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is dominated by a mix of California brittlebush (*Encelia californica*) and California sagebrush. Giant wild rye (*Elymus condensatus*) is scattered throughout and the understory is dominated by ripgut grass.

California Brittle Bush–California Sagebrush–Coyote Brush Scrub. California brittle bush–California sagebrush–coyote brush scrub occurs in a strip in the north-central portion of the survey area. This vegetation type is dominated by California brittle bush and California sagebrush, but has a relatively even scattering of coyote brush (*Baccharis pilularis* ssp*. consanguinea*). Giant wild rye is also present and mule fat (*Baccharis salicifolia* ssp. *salicifolia*) occurs at the base of the slope. The understory contains species such as ripgut grass and freeway iceplant.

Coyote Brush Scrub/Needle Grass Grassland. Coyote brush scrub/needle grass grassland occurs at the bottom of slopes in the middle of the western half of the survey area. This vegetation type contains greater than ten percent cover of native needlegrass (*Stipa* sp.) with scattered coyote brush and giant wild rye, though it is dominated by ripgut grass and crown daisy.

Disturbed Toyon Chaparral. Disturbed toyon chaparral occurs on the slope adjacent to residential development at the northwestern edge of the survey area. This area contains a few scattered toyon (*Heteromeles arbutifolia*) and olive (*Olea europaea*) trees that have been trimmed for fuel management. The understory and most of the slope are covered by non-native grasses that have been mowed. A second area of disturbed toyon chaparral occurs adjacent to the parking lot at the northwestern edge of the survey area. This area contains a mix of species such as toyon, coyote brush, mule fat, and giant wild rye that appear to have been planted as landscaping around the parking lot. It is disturbed by foot traffic.

Giant Wild Rye Grassland. Giant wild rye grassland occurs on a slope in the center of the western half of the survey area. This vegetation type is dominated by giant wild rye. Other species present include needlegrass, ripgut grass, and scattered coyote brush.

Needle Grass Grassland. Needle grass grassland occurs in the center of the survey area and east of the retention basin (near Blair Hills Park). It is characterized by greater than ten percent cover of needlegrass. Other species present include fascicled tarplant (*Deinandra fasciculata*), ripgut grass, wild oat (*Avena* sp.), and scattered California buckwheat.

Annual Brome–Wild Oats Grassland. Annual brome–wild oats grassland occurs in large patches throughout the survey area. It is dominated by a mix of ripgut grass and wild oat. Some areas contain lesser amounts of Italian ryegrass (*Festuca perennis*), castor bean, and crown daisy.

Giant Reed Stand. A giant reed stand occurs in a small patch in the southeastern corner of the survey area. It consists of giant reed, an invasive non-native species.

Ruderal. Ruderal vegetation occurs in three patches throughout the survey area. It is dominated by various non-native forbs such as castor bean, crown daisy, and Russian thistle (*Salsola tragus*).

Disturbed Mulefat Thicket. Disturbed mulefat thicket occurs in an isolated patch surrounded by access roads in the eastern end of the survey area. It consists of a patch of mule fat degraded by the presence of freeway iceplant and giant reed.

Ornamental. Ornamental vegetation occurs primarily along the edges of the survey area adjacent to off-site developments. It consists of various planted ornamental species, such as gum trees

(*Eucalyptus* sp.), freeway iceplant, pampas grass (*Cortaderia selloana*), and Mexican fan palm (*Washingtonia robusta*), with ripgut grass.

Disturbed. Disturbed areas occur throughout the southern and eastern portions of the survey area and consist of bare ground and unpaved dirt roads with scattered oil pumps.

Developed. Developed areas in the western half of the survey area consist of concrete structures, such as the parking lot at the western end of the survey area, flood-control structures, and concrete slabs. Developed areas at the eastern end of the survey area consist of La Cienega Boulevard and residential development.

Wildlife

Several common wildlife species were observed or have potential to occur in the survey area, as discussed below.

Fish. Within the survey area, the only natural water features are ephemeral drainages with no substantial water flow occurring within them, other than during rainfall events. As such, there are no connections between existing water features to any outflow or drainage that would direct water off site. Therefore, fish are not expected to occur in the survey area.

Amphibians. Considering the lack of natural water features and associated habitat, it is not likely that substantial populations of any amphibian species would be supported in the survey area. No amphibian species were observed during surveys. Common species that have limited potential to occur in the survey area include Baja California treefrog (*Pseudacris hypochondriaca*), western toad (*Anaxyrus boreas*), and American bullfrog (*Lithobates catesbeiana*).

Reptiles. Reptiles are well-adapted to life in arid habitats. Reptilian diversity and abundance typically varies with vegetation type and character. Many species prefer only one or two vegetation types; however, most species will forage in a variety of habitats. Most reptile species that occur in open areas will excavate a burrow or use rodent burrows for cover, protection from predators, and refuge during extreme weather conditions.

Reptile species observed during surveys include western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), and southern alligator lizard (*Elgaria multicarinata*). Other common species that could potentially occur include gopher snake (*Pituophis catenifer*), California kingsnake (*Lampropeltis getula californiae*), and southern Pacific rattlesnake (*Crotalus oreganus helleri*).

Birds. A variety of bird species are expected to be residents of the area, using the habitats throughout the year. Other species are present only during certain seasons (i.e., either wintering in the area and breeding elsewhere or migrating into the region to breed but wintering generally south of the region) or while migrating through the area.

Resident bird species observed in the survey area include California quail (*Callipepla californica*), western scrub-jay (*Aphelocoma californica*), common raven (*Corvus corax*), bushtit (*Psaltriparus minimus*), Bewick's wren (*Thryomanes bewickii*), spotted towhee (*Pipilo maculatus*), and California towhee (*Pipilo crissalis*). Urban-tolerant species that occur in disturbed areas and in natural vegetation types that were also observed on the property include mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), black phoebe (*Sayornis nigricans*), American crow (*Corvus brachyrhynchos*), northern mockingbird (*Mimus polyglottos*), house finch (*Carpodacus mexicanus*), and lesser goldfinch (*Spinus* [*Carduelis*] *psaltria*).

Wintering species observed on the property include white-crowned sparrow (*Zonotrichia leucophrys*). Summer breeders observed on the property include cliff swallow (*Petrochelidon pyrrhonota*), lazuli bunting (*Passerina amoena*), and hooded oriole (*Icterus cucullatus*).

Birds of prey (raptors) observed on the property include Cooper's hawk (*Accipiter cooperii*) and red-tailed hawk (*Buteo jamaicensis*).

Mammals. Given the adjacent development and disturbed nature of adjacent open space in the oil fields, the mammals primarily expected to utilize the survey area are small, ground-dwelling species. Small mammals observed in the survey area include California ground squirrel (*Spermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), and desert cottontail (*Sylvilagus audubonii*).

Larger mammals, including both herbivores and carnivores, that may occur in the survey area include striped skunk (*Mephitis mephitis*), Virginia opossum (*Didelphis virginiana*), common raccoon (*Procyon lotor*), coyote (*Canis latrans*), and feral cat (*Felis catus*).

Bat activity in the survey area is expected to be limited due to the lack of suitable cliffs, buildings, or other man-made structures that may serve as roost sites; though species that roost in trees may occur. However, common species such as Brazilian free-tailed bat (*Tadarida brasiliensis*) may forage in the survey area.

Special Status Biological Resources

Special status biological resources include plant and wildlife species that have been afforded special status and/or recognition by federal and State resource agencies, as well as private conservation organizations. In general, the principal reason an individual taxon (i.e., species, subspecies, or variety) is given such recognition is the documented or perceived decline or limitations of its population size, geographic range, and/or distribution resulting in most cases from habitat loss. In addition, special status biological resources include vegetation types and habitats that are either unique, of relatively limited distribution in the region, or of particularly high wildlife value. These resources have been defined by federal, State, and local government conservation programs.

Special Status Vegetation Types

Scrub communities in the survey area include California sagebrush scrub, disturbed California sagebrush scrub, California brittle bush–California sagebrush scrub, California brittle bush–California sagebrush–coyote brush scrub, and coyote brush scrub/needle grass grassland. These vegetation types are considered special status because they have the potential to support Threatened or Endangered species, such as the coastal California gnatcatcher. In addition, California brittle bush–California sagebrush scrub has a State rarity rank of S3, meaning it is considered vulnerable and at moderate risk of elimination (CDFG 2010). Coastal sage scrub had, as a whole, declined approximately 70 to 90 percent in its historic range in California by the mid-1990s (Noss and Peters 1995). Sage scrub has largely been lost to land use changes in Southern California basins and foothills. The ecological function of Southern California's remaining sage scrub is threatened by habitat fragmentation and degradation, which is largely the result of invasive non-native species, livestock grazing, off-highway vehicles, altered fire regime, and air pollution (O'Leary 1995; Allen et al. 2000).

Toyon chaparral has a State rarity rank of S3 (CDFG 2010); however, the disturbed toyon chaparral in the survey area would not be considered special status due to its heavily degraded nature.

Giant wild rye grassland and needle grass grassland have a State rarity rank of S3 (tentative ranking for needle grass grassland) (CDFG 2010) and would be considered special status. Native grasslands, which once may have covered nearly $^1/_5$ of the state, have declined by approximately 99 percent in their historic range in California (Barry 1972; Noss and Peters 1995).

Mulefat thickets are considered secure or apparently secure on a Statewide and global scale and would not be considered special status (CDFG 2010). Note that while mulefat thickets may be associated with riparian areas, the disturbed mulefat thicket in the survey area is in an upland context and would not be considered riparian vegetation.

Annual brome–wild oats grassland, giant reed stand, ruderal, and ornamental vegetation, along with disturbed and developed areas, would not be considered special status due to the lack of native habitat characterizing these areas.

Special Status Plant Species

Fifty-three special status plant species have been reported from the survey area vicinity (Table 4-7). Of these species, Southern California black walnut (*Juglans californica*), a species with a California Rare Plant Rank (CRPR) of 4.2, was observed in the survey area. Four individual trees are present adjacent to the parking lot of the Baldwin Hills Scenic Overlook (Exhibit 4-2).

TABLE 4-7
SPECIAL STATUS PLANT SPECIES REPORTED
FROM THE SURVEY AREA VICINITY

Species	Status			Habitat Suitability and Survey Results
	USFWS	CDFW	CRPR	
Abronia maritima red sand-verbena	–	–	4.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Arenaria paludicola marsh sandwort	FE	SE	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Astragalus brauntonii Braunton's milkvetch	FE	–	1B.1	Marginal potentially suitable habitat, but not observed during focused surveys.
Astragalus pycnostachyus var. *lanosissimus* Ventura marsh milkvetch	FE	SE	1B.1	No suitable habitat; only known from one occurrence and not observed during focused surveys; not expected to occur.
Astragalus tener var. *titi* coastal dunes milkvetch	FE	SE	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Atriplex parishii Parish's brittlescale	–	–	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Atriplex serenana var. *davidsonii* Davidson's saltscale	–	–	1B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
California macrophylla round-leaved filaree	–	–	1B.2	Potentially suitable habitat, but not observed during focused surveys.
Calochortus catalinae Catalina mariposa lily	–	–	4.2	Potentially suitable habitat, but not observed during focused surveys.
Calochortus plummerae Plummer's mariposa lily	–	–	4.2	Potentially suitable habitat, but not observed during focused surveys.

TABLE 4-7
SPECIAL STATUS PLANT SPECIES REPORTED FROM THE SURVEY AREA VICINITY

Species	Status			Habitat Suitability and Survey Results
	USFWS	CDFW	CRPR	
Calystegia felix lucky morning-glory*	–	–	3.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Calystegia sepium ssp. *binghamiae* Santa Barbara morning-glory	–	–	1A	No suitable habitat; considered extinct and not observed during focused surveys; not expected to occur.
Camissoniopsis lewisii [*Camissonia l.*] Lewis' evening-primrose	–	–	3	No suitable habitat and not observed during focused surveys; not expected to occur.
Centromadia parryi ssp. *australis* southern tarplant	–	–	1B.1	Potentially suitable habitat, but not observed during focused surveys.
Chaenactis glabriuscula var. *orcuttiana* Orcutt's pincushion	–	–	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Chenopodium littoreum coastal goosefoot	–	–	1B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Chloropyron maritimum ssp. *maritimum* salt marsh bird's-beak	FE	SE	1B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Chorizanthe parryi var. *fernandina* San Fernando Valley spineflower	FC	SE	1B.1	Marginal potentially suitable habitat, but not observed during focused surveys.
Convolvulus simulans small-flowered morning-glory	–	–	4.2	Potentially suitable habitat, but not observed during focused surveys.
Deinandra paniculata paniculate tarplant	–	–	4.2	Potentially suitable habitat, but not observed during focused surveys.
Dichondra occidentalis western dichondra	–	–	4.2	Potentially suitable habitat, but not observed during focused surveys.
Dithyrea maritima beach spectaclepod	–	ST	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Dudleya multicaulis many-stemmed dudleya	–	–	1B.2	Potentially suitable habitat, but not observed during focused surveys.
Eryngium aristulatum var. *parishii* San Diego button-celery	FE	SE	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Erysimum insulare island wallflower	–	–	1B.3	No suitable habitat and not observed during focused surveys; not expected to occur.
Erysimum suffrutescens suffrutescent wallflower	–	–	4.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Frankenia palmeri Palmer's frankenia	–	–	2B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Helianthus nuttallii ssp. *parishii* Los Angeles sunflower	–	–	1A	No suitable habitat; considered extinct and not observed during focused surveys; not expected to occur.

TABLE 4-7
SPECIAL STATUS PLANT SPECIES REPORTED FROM THE SURVEY AREA VICINITY

Species	Status			Habitat Suitability and Survey Results
	USFWS	CDFW	CRPR	
Hesperocyparis macrocarpa Monterey cypress	–	–	1B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Hordeum intercedens bobtail barley	–	–	3.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Horkelia cuneata var. *puberula* mesa horkelia	–	–	1B.1	Marginal potentially suitable habitat, but not observed during focused surveys.
Juglans californica **Southern California black walnut**	**–**	**–**	**4.2**	**Suitable habitat present. Observed during focused surveys.**
Juncus acutus ssp. *leopoldii* southwestern spiny rush	–	–	4.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Lasthenia glabrata ssp. *coulteri* Coulter's goldfields	–	–	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Lepidium virginicum var. *robinsonii* Robinson's pepper-grass	–	–	4.3	Potentially suitable habitat, but not observed during focused surveys.
Mucronea californica California spineflower	–	–	4.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Nama stenocarpum mud nama	–	–	2B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Nasturtium gambelii Gambel's water cress	FE	ST	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Navarretia fossalis spreading navarretia	FT	–	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Navarretia prostrata prostrate vernal pool navarretia	–	–	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Orcuttia californica California Orcutt grass	FE	SE	1B.1	No suitable habitat and not observed during focused surveys; not expected to occur.
Phacelia hubbyi Hubby's phacelia	–	–	4.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Phacelia ramosissima var. *austrolitoralis** south coast branching phacelia	–	–	3.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Phacelia stellaris Brand's star phacelia	–	–	1B.1	Potentially suitable habitat, but not observed during focused surveys.
Potentilla multijuga Ballona cinquefoil	–	–	1A	No suitable habitat and not observed during focused surveys; not expected to occur.
Pseudognaphalium leucocephalum white rabbit-tobacco	–	–	2B.2	No suitable habitat and not observed during focused surveys; not expected to occur.

TABLE 4-7
SPECIAL STATUS PLANT SPECIES REPORTED
FROM THE SURVEY AREA VICINITY

Species	Status			Habitat Suitability and Survey Results
	USFWS	CDFW	CRPR	
Quercus dumosa Nuttall's scrub oak	–	–	1B.1	Potentially suitable habitat, but not observed during focused surveys.
Ribes divaricatum var. *parishii* Parish's gooseberry	–	–	1A	No suitable habitat; considered extinct and not observed during focused surveys; not expected to occur.
Sidalcea neomexicana salt spring checkerbloom	–	–	2B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Suaeda esteroa estuary seablite	–	–	1B.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Suaeda taxifolia woolly seablite	–	–	4.2	No suitable habitat and not observed during focused surveys; not expected to occur.
Symphyotrichum defoliatum San Bernardino aster	–	–	1B.2	Potentially suitable habitat, but not observed during focused surveys.
Symphyotrichum greatae Greata's aster	–	–	1B.3	No suitable habitat and not observed during focused surveys; not expected to occur.

USFWS: U.S. Fish and Wildlife Service; CDFW: California Department of Fish and Wildlife; CRPR: California Rare Plant Rank

LEGEND:

Federal (USFWS)
FE Endangered
FT Threatened
FC Candidate

State (CDFW)
SE Endangered
ST Threatened

CRPR
1A Plants presumed extirpated in California and either rare or extinct elsewhere
1B Plants Rare, Threatened, or Endangered in California and elsewhere
2B Plants Rare, Threatened, or Endangered in California but more common elsewhere
3 Plants about which we need more information – A Review List
4 Plants of limited distribution – A Watch List

CRPR Threat Code Extensions
None Plants lacking any threat information
.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
.2 Fairly threatened in California (20–80% of occurrences threatened; moderate degree and immediacy of threat)
.3 Not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known)

Note: Taxa observed in the survey area are shown in **boldface** type.

* Taxon not currently recognized by the Jepson Herbarium (2014), but it is still tracked by the CDFW and/or CNPS.

Special Status Wildlife Species

Twenty-eight special status wildlife species have been reported from the survey area vicinity (Table 4-8). Of these species, Cooper's hawk, a species considered by the CDFW to be on their Watch List, was observed in the survey area during 2015 surveys. While coastal California gnatcatchers were not observed during the 2015 surveys, at least three juveniles were observed during the 2014 non-breeding season surveys. Therefore, this species has the potential to occupy suitable habitat in the survey area in the future.

TABLE 4-8
SPECIAL STATUS WILDLIFE SPECIES REPORTED FROM THE SURVEY AREA VICINITY

Species	Status		Habitat Suitability and Survey Results
	USFWS	CDFW	
Invertebrates			
Euphilotes battoides allyni El Segundo blue butterfly	FE	–	No suitable habitat; not expected to occur.
Streptocephalus woottoni Riverside fairy shrimp	FE	–	No suitable habitat; not expected to occur.
Reptiles			
Emys marmorata western pond turtle	–	SSC	No suitable habitat; not expected to occur.
Phrynosoma blainvillii coast horned lizard	–	SSC	Marginal potentially suitable habitat; limited potential to occur.
Aspidoscelis tigris stejnegeri coastal whiptail	–	SA	Potentially suitable habitat; may occur.
Birds			
Pelecanus occidentalis californicus California brown pelican	Delisted	Delisted, FP	No suitable habitat; not expected to occur.
Accipiter cooperii **Cooper's hawk (nesting)**	–	**WL**	**Suitable foraging and nesting habitat; observed foraging and may occur for nesting.**
Buteo swainsoni Swainson's hawk (nesting)	–	ST	No suitable foraging habitat and nests outside the region; not expected to occur.
Laterallus jamaicensis coturniculus California black rail	–	ST, FP	No suitable habitat; not expected to occur.
Charadrius alexandrinus nivosus western snowy plover (nesting)	FT	SSC	No suitable foraging or nesting habitat; not expected to occur.
Sternula antillarum browni California least tern (nesting colony)	FE	SE, FP	No suitable foraging or nesting habitat; not expected to occur.
Coccyzus americanus occidentalis western yellow-billed cuckoo (nesting)	FT	SE	No suitable foraging or nesting habitat; not expected to occur.
Athene cunicularia burrowing owl (burrow sites)	–	SSC	No suitable foraging or nesting habitat; not expected to occur.
Empidonax traillii extimus southwestern willow flycatcher (nesting)	FE	SE	No suitable foraging or nesting habitat; not expected to occur.
Vireo bellii pusillus least Bell's vireo (nesting)	FE	SE	No suitable foraging or nesting habitat; not expected to occur.
Riparia bank swallow (nesting)	–	ST	No suitable foraging or nesting habitat; not expected to occur.
Polioptila californica **coastal California gnatcatcher**	**FT**	**–**	**Potentially suitable habitat; may occur. Juveniles observed during 2014 surveys.**
Passerculus sandwichensis beldingi Belding's savannah sparrow	–	SE	No suitable habitat; not expected to occur.
Mammals			
Sorex ornatus salicornicus Southern California saltmarsh shrew	–	SSC	No suitable habitat; not expected to occur.
Antrozous pallidus pallid bat	–	SSC	Potentially suitable foraging and roosting habitat; may occur for foraging and roosting.

TABLE 4-8
SPECIAL STATUS WILDLIFE SPECIES REPORTED
FROM THE SURVEY AREA VICINITY

Species	Status		Habitat Suitability and Survey Results
	USFWS	CDFW	
Lasionycteris noctivagans silver-haired bat	–	SA	Potentially suitable foraging and roosting habitat; may occur for foraging and roosting.
Lasiurus cinereus hoary bat	–	SA	Potentially suitable foraging and roosting habitat; may occur for foraging and roosting.
Eumops perotis californicus western mastiff bat	–	SSC	Potentially suitable foraging habitat; may occur for foraging. No suitable roosting habitat; not expected to occur for roosting.
Nyctinomops femorosaccus pocketed free-tailed bat	–	SSC	Outside of current known range; not expected to occur.
Nyctinomops macrotis big free-tailed bat	–	SSC	Outside of current known range; not expected to occur.
Perognathus longimembris pacificus Pacific pocket mouse	–	SSC	No suitable habitat; not expected to occur.
Microtus californicus stephensi south coast marsh vole	–	SSC	No suitable habitat; not expected to occur.
Taxidea taxus American badger	–	SSC	Marginal potentially suitable habitat; limited potential to occur.

USFWS: U.S. Fish and Wildlife Service; CDFW: California Department of Fish and Wildlife

LEGEND:

Federal (USFWS)
FE Endangered
FT Threatened

State (CDFW)
SE Endangered
ST Threatened
SSC Species of Special Concern
FP Fully Protected
WL Watch List
SA Special Animal

Note: Taxa observed in the survey area are shown in **boldface** type.

Other special status wildlife species that have potential or limited potential to occur in the survey area include coast horned lizard (*Phrynosoma blainvillii*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), pallid bat *(Antrozous pallidus*), silver-haired bat (*Lasionycteris noctivagans*), hoary bat (*Lasiurus cinereus*), western mastiff bat (*Eumops perotis californicus*), and American badger (*Taxidea taxus*).

4.4.2 Impact Analysis

The following analysis addresses “direct” and “indirect” impacts. Direct impacts are those that involve the initial loss of habitat or individuals due to vegetation clearing and construction-related activities. Indirect impacts would be those related to impacts on the adjacent remaining habitat due to construction activities (e.g., noise, dust) or operation of a project (e.g., human activity). The following types of impacts are considered in this analysis: construction of the new trail alignment, bridge, and access road; installation of landscaping adjacent to the proposed trail; and undergrounding of utility lines along La Cienega Boulevard to accommodate the new pedestrian bridge. Note that project impacts resulting from the new bridge have been calculated based on

the plan view of the bridge. Since the bridge will span the eastern edge of the survey area and La Cienega, vegetation within this impact area will not entirely be removed and this represents an overestimation of proposed impacts.

a) Less Than Significant Impact with Mitigation

Special Status Plant Species

Fifty-two special status plant species listed in Table 4-7 either are not expected to occur in the survey area due to lack of suitable habitat or were not observed during multiple years of focused surveys. Therefore, there would be no impact on these species and no mitigation would be required.

One special status plant species, Southern California black walnut, has been observed at the parking lot in the Baldwin Hills Scenic Overlook. This species is designated in the California Rare Plant Rank (CRPR) as 4.2 (on the Watch List). To avoid impacts to this tree species, protective fencing shall be provided around the three walnut trees prior to construction of Segment C (MM 4.4-1). Exhibit 4-3 shows the location of walnut trees to be protected. Impacts would be less than significant after mitigation.

Special Status Wildlife Species

To assess impacts on special status wildlife species, the impacted areas of specific vegetation types that provide habitat for wildlife was assessed (Table 4-9; see Exhibit 4-4). As shown, a total of 3.58 acres would be impacted by the project of the 27.90-acre area that includes the BHRCA parcel, portions of the Baldwin Hills Scenic Overlook and the KHSRA, and the public right-of-way of La Cienega Boulevard.

Nineteen special status wildlife species listed in Table 4-8 are not expected to occur in the survey area due to lack of suitable habitat. Therefore, there would be no impact on these species and no mitigation would be required.

Potentially suitable habitat for one federally listed species, the coastal California gnatcatcher, occurs in the survey area. While this species was not observed during 2015 surveys, juveniles were observed during 2014 non-breeding surveys. Given that 2012 and 2015 breeding season surveys were negative for breeding pairs, it is assumed that coastal California gnatcatchers do not nest in the survey area at this time and that the juveniles were likely dispersing individuals. The proposed project would impact approximately 0.46 acre of potentially suitable habitat for this species (i.e., 0.36 acre of California brittle bush–California sagebrush scrub and 0.10 acre of coyote brush scrub/needle grass grassland). Given the small amount of impacts relative to the availability of suitable habitat in the region and the lack of documented breeding in the survey area, this impact is considered less than significant and no mitigation would be required. However, if coastal California gnatcatchers were to begin breeding in the survey area in the future, the loss of an active nest of this species would be considered significant. Implementation of MM 4.4-2 would reduce this impact to less than significant.

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Existing Walnut Trees

Exhibit 4-3

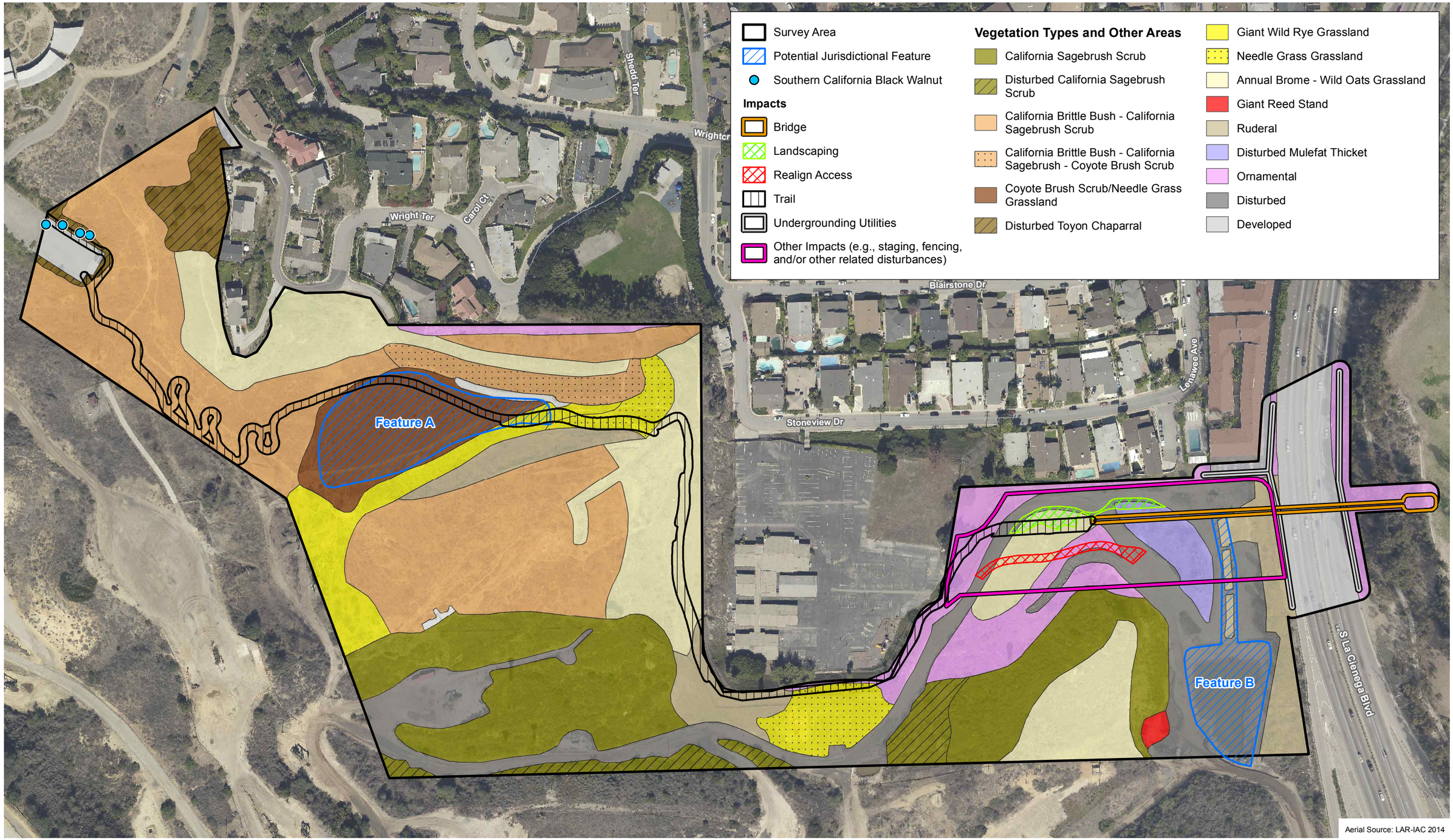
Segment C of the Park to Playa Trail

N
W E
S

75 37.5 0 75 Feet

BonTerra PSOMAS

(Rev: 11-13-2015 CJS) R:\Projects\Alta (ALT)\3ALT000302\Graphics\ISMND\Ex4-3_walnut_trees_20151112.pdf



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Project Impacts on Biological Resources

Exhibit 4-4

Segment C of the Park to Playa Trail

N W E S

180 90 0 180 Feet

BonTerra PSOMAS

(Rev: 11-12-2015 CJS) R:\Projects\Alta (ALT)\3ALT000302\Graphics\ISMND\Ex4-3_Impacts_20151112.pdf

TABLE 4-9
PROJECT IMPACT BY VEGETATION TYPE

Vegetation Type/Other Area	Area* (acres)	Project Impacts (acres)						
		Trail Alignment	Bridge	Relocated Access Road	Landscape Buffer	Utility Trenching	Other Impacts**	Total
Annual Brome–Wild Oats Grassland	4.15	0.26	0.0	0.03	0.03	0.0	0.21	0.53
California Brittle Bush–California Sagebrush–Coyote Brush Scrub	0.47	0.0	0.0	0.0	0.0	0.0	0.0	0.00
California Brittle Bush–California Sagebrush Scrub	6.10	0.36	0.0	0.0	0.0	0.0	0.0	0.36
California Sagebrush Scrub	3.75	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Coyote Brush Scrub/Needle Grass Grassland	1.31	0.10	0.0	0.0	0.0	0.0	0.0	0.10
Disturbed California Sagebrush Scrub	0.65	0.0	0.0	0.0	0.0	0.0	0.0	0.00
Disturbed Mulefat Thicket	0.38	0.0	0.03	0.0	0.02	0.0	0.27	0.32
Disturbed Toyon Chaparral	0.57	0.03	0.0	0.0	0.0	0.0	0.0	0.03
Giant Reed Stand	0.05	0.0	0.0	0.0	0.0	0.0	0.0	0.00
Giant Wild Rye Grassland	0.91	0.06	0.0	0.0	0.0	0.0	0.0	0.06
Needle Grass Grassland	0.77	0.12	0.0	0.0	0.0	0.0	0.0	0.12
Ornamental	2.09	0.13	0.06	0.04	0.0	0.07	0.34	0.64
Ruderal	1.53	0.10	0.02		0.0	0.03	0.24	0.39
Developed	1.41	0.03	0.02	0.0	0.0	0.01	0.0	0.06
Disturbed	3.76	0.02	0.03	0.04	0.04	0.0	0.84	0.97
Total	**27.90**	**1.21**	**0.16**	**0.11**	**0.09**	**0.11**	**1.90**	**3.58**

* includes entire BHRCA parcel and adjacent areas that would be disturbed
** includes staging, fencing and other related disturbances

Cooper's hawk has been observed foraging in the survey area and has potential to nest. The loss of up to 3.58 acres of foraging habitat is adverse, but less than significant given the amount of available foraging habitat remaining in the region. In addition, landscaping of approximately 0.09 acre of primarily disturbed and non-native vegetation would have a beneficial effect on this species. Therefore, no mitigation for the loss of foraging habitat would be required. Should an active Cooper's hawk nest be disturbed or destroyed during project construction, the loss of the nest would be considered a violation of the *California Fish and Game Code* (Sections 3503, 3503.5, and 3513). Implementation of MM 4.4-2 would be required to ensure compliance with *California Fish and Game Code*.

Suitable or marginally suitable habitat for coast horned lizard, coastal whiptail, pallid bat, silver-haired bat, hoary bat, western mastiff bat, and American badger occurs in the survey area. While the loss of up to 3.58 acres of habitat for these species would be considered adverse, impacts would be considered less than significant due to the species' statuses and because the loss would not substantially affect the regional population of these species. In addition, landscaping of approximately 0.09 acre of primarily disturbed and non-native vegetation would have a beneficial effect on these species. Therefore, no mitigation would be required.

b) Less than Significant Impact with Mitigation

Riparian habitat is not present in the survey area; therefore, there would be no impacts on riparian habitat and no mitigation would be required.

The disturbed toyon chaparral, mule fat thickets, annual brome–wild oats grassland, giant reed stand, ruderal, and ornamental vegetation, along with disturbed and developed areas, would not be considered special status. While these areas may provide marginal habitat for a variety of native plant and wildlife species, impacts on these vegetation types would be considered less than significant and no mitigation would be required. The conversion of 0.03 acre of annual brome–wild oats grassland and 0.04 acre of disturbed areas to landscaping would, in fact, enhance the quality of these areas.

Approximately 0.46 acre of special status scrub communities in the survey area would be impacted by the proposed project (0.36 acre of California brittle bush–California sagebrush scrub and 0.10 acre of coyote brush scrub/needle grass grassland). Impacts would be considered significant (1) because the County considers these vegetation types to be sensitive; (2) due to the low remaining acreage of these vegetation types in Southern California and in the project area; (3) because the CDFW lists these as special status vegetation types; and (4) because of these vegetation types' potential to support special status species. Implementation of MM 4.4-3 would reduce these impacts to less than significant.

Approximately 0.18 acre of special status grassland communities in the survey area would be impacted by the proposed trail (0.06 acres giant wild rye grassland and 0.12 needle grass grassland). Impacts would be considered adverse, but less than significant given the limited amount of impacts relative to the amount of this vegetation type available in the project region. Therefore, no mitigation would be required.

The proposed project includes landscaping associated with the proposed trail. Should this landscaping include the installation of non-native, invasive species, then these species have the potential to spread into the surrounding native vegetation and displace native species. Implementation of MM 4.4-4 would ensure that the proposed landscaping would not significantly affect surrounding special status vegetation types.

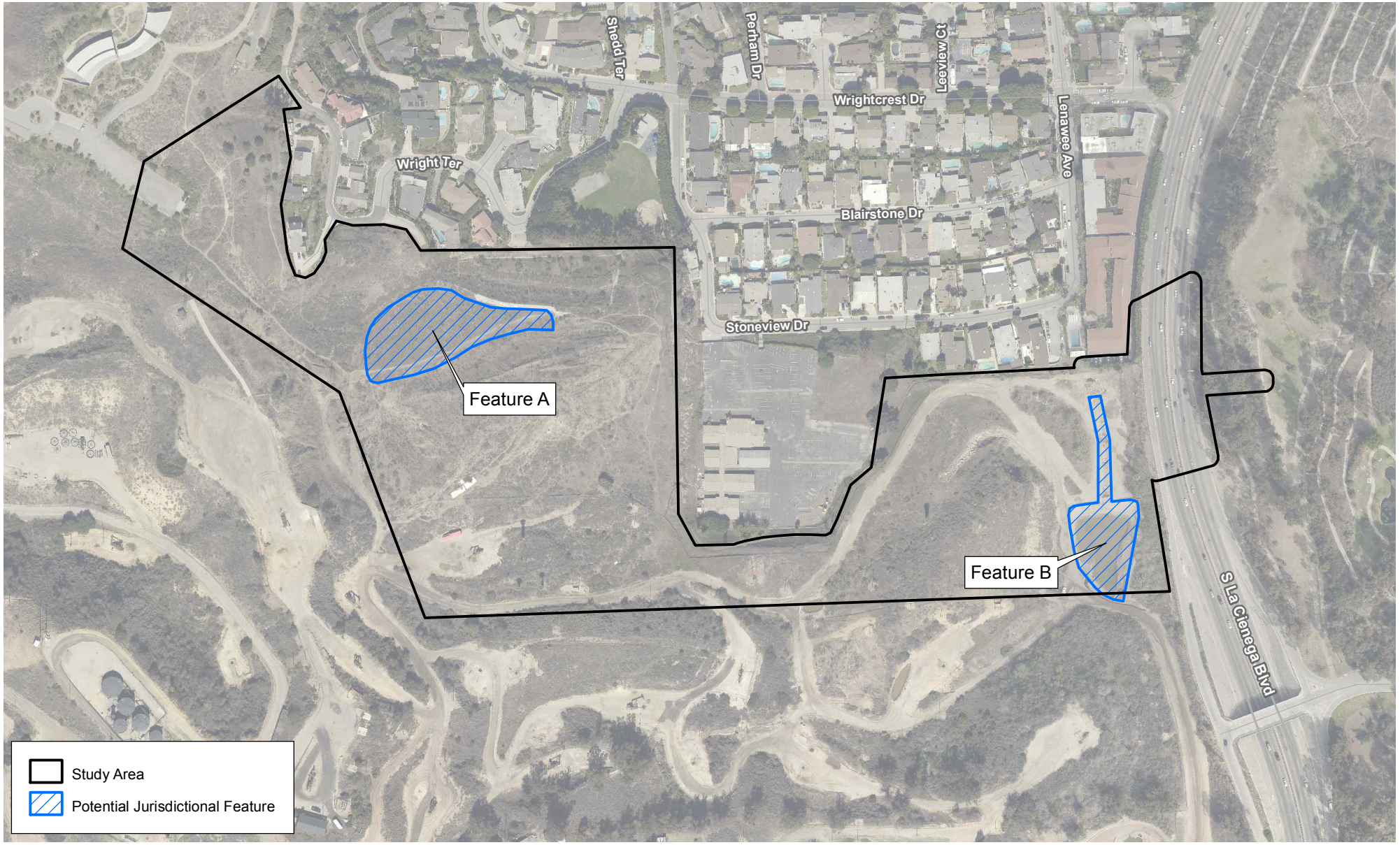
c) Less than Significant Impact with Mitigation

No wetland resources as defined by Section 404 of the Clean Water Act are present in the survey area. Therefore, there will be no impact on wetlands and no mitigation would be required.

Two potential jurisdictional features were mapped on the BHRCA property in 2012 (Exhibit 4-5).

Feature A is a soft-bottom and generally flat debris basin located in the western half of the survey area. The lowest point of this area contains a small standpipe inlet tower and a concrete wall for scour protection along the northern edge. While these structures indicate that this is a flood control facility, no defined bed, bank, or channel was observed in this area; there was no indication of water marks or flow; and the vegetation within and surrounding the area consists of upland species. Therefore, this feature is not expected to be under the jurisdiction of the USACE, the RWQCB, or the CDFW.

The proposed trail would pass through Feature A in the western half of the survey area. However, this feature is not considered to be under the jurisdiction of the USACE, the RWQCB, or the CDFW and these impacts would not require regulatory authorization.



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Jurisdictional Resources

Exhibit 4-5

Segment C of the Park to Playa Trail

N W E S

300 150 0 300 Feet

BonTerra PSOMAS

(Rev: 11-12-2015 LEW) R:\Projects\Alta (ALT)\3ALT000302\Graphics\ISMND\Ex_JD_Resources_20150828.pdf

Feature B is a retention basin and concrete-lined storm drain channel just west of La Cienega Boulevard, at the eastern end of the survey area. Constructed lakes, ponds, and stormwater control features created in dry land are not under USACE jurisdiction; therefore, Feature B is not a "water of the U.S.". It may be considered under the jurisdiction of the RWQCB and/or the CDFW since it has a bed and bank and conveys stormwater through a storm drain system.

The proposed bridge would span the drainage channel of Feature B. If bridge-supporting structures are placed within this channel or construction access requires modifications to this channel, regulatory authorization from the RWQCB and/or the CDFW would be required. Implementation of MM 4.4-5 would ensure compliance with Section 401 of the Clean Water Act and Section 1602 of the *California Fish and Game Code*, which gives the RWQCB and the CDFW jurisdictional authority over water resources.

d) Less than Significant Impact with Mitigation

The Baldwin Hills are the largest open space area in the Los Angeles Basin. This open space is bound by urban development on all sides. The Santa Monica Mountains are located north of the Los Angeles Basin, with the Pacific Ocean to the west and south, and the Puente Hills and Santa Ana Mountains to the east and southeast, respectively. Because of the isolation of the Baldwin Hills from the surrounding areas of open space, most species inhabiting these separate islands of habitat are not expected to venture across the wide expanse of urban development that separates their populations. However, animals living in the Baldwin Hills may potentially use the various canyons, ridgelines, habitats, and other linear features to travel locally in the hills. Most large-scale regional wildlife movement between the Baldwin Hills and the open spaces beyond the Los Angeles Basin is expected to be restricted to avian movement.

Wildlife may move across the survey area and to adjacent open space in the Baldwin Hills Scenic Overlook to the west and oil fields to the south. However, terrestrial wildlife movement between the survey area and the Kenneth Hahn State Recreation Area to the east is expected to be inhibited by the La Cienega Boulevard.

During active construction, wildlife may be deterred by noise and human activity; however, most construction activities at open and undeveloped areas would occur during the day and there is existing ambient noise due to the adjacent vehicle traffic. On the other hand, wildlife movement generally occurs at night. In addition, construction activities would be temporary in nature. Therefore, construction impacts on local wildlife movement would be considered adverse, but less than significant and no mitigation would be required.

The proposed trail alignment and new access road would be at-grade except where the pedestrian bridge would cross La Cienega Boulevard. Therefore, the presence of the trail and access road would not be expected to create a barrier to local wildlife movement. In addition, since there are existing access roads in the survey area, the realignment of an access road would not be expected to interfere with wildlife movement above existing conditions. Therefore, the proposed trail and access road would not significantly interfere with wildlife movement and no mitigation would be required.

The proposed undergrounding of utility lines would occur adjacent to existing development (i.e., residential development and a paved roadway). The proposed bridge would not affect wildlife movement since it is already inhibited by the presence of La Cienega Boulevard. These impacts would not interfere with wildlife movement and no mitigation would be required.

Long-term use of the trail for recreational activities would increase human activity above present levels. This may result in adverse effects on wildlife in surrounding open space. The proposed

landscaping of areas along the trail is expected to provide additional cover for wildlife and result in a beneficial effect on wildlife in the area. Fencing would be provided to prevent access to areas north and south of the eastern and central segments of the trail and a trash receptacle would be provided.

Night lighting along the trail, if proposed, may adversely affect wildlife. Night lighting may impact the behavioral patterns of nocturnal and crepuscular (i.e., active at dawn and dusk) wildlife adjacent to the lighted areas. Of greatest concern is the effect on small, ground-dwelling animals that use the darkness to hide from predators and on owls, which are specialized night foragers. MM 4.4-6 is recommended to ensure that night lighting is not directed into adjacent wildlife habitats.

Several common native bird species have potential to nest in the vegetation throughout the survey area. The loss of active nests for any migratory bird species may be considered a violation of the Migratory Bird Treaty Act (MBTA), which protects the nests of all migratory bird species, including common species. If construction were initiated during the nesting season, generally between March 15 and September 15, nests could be directly impacted by equipment and/or human mobility. Additionally, the increased noise and human activity could disturb nesting birds and may impact their behavior and ultimately the success of their nests. Implementation of MM 4.4-2 would be required to ensure compliance with the MBTA.

Raptor species (e.g., red-tailed hawk) also have potential to nest in the survey area. Should an active raptor nest (common or special status species) be disturbed or destroyed during project construction, the loss of the nest would be considered a violation of the *California Fish and Game Code* (Sections 3503, 3503.5, and 3513). Implementation of MM 4.4-2 would be required to ensure compliance with *California Fish and Game Code*.

e) No Impact

The majority of the survey area falls within the City of Culver City; the portion of the proposed bridge east of the centerline of La Cienega Boulevard is within the City of Los Angeles.

The City of Culver City has a Street Tree Master Plan that assigns tree species on specific streets in the City. The proposed project would not conflict with the Street Tree Master Plan and no mitigation would be required.

The proposed project may impact existing trees (e.g., gum trees east of the proposed bridge spanning La Cienega Boulevard). The City of Los Angeles has a tree ordinance (Los Angeles City Municipal Code Chapter IV, Article 6 – Preservation of Protected Trees) that identifies oak, Southern California black walnut, western sycamore, and California bay trees as protected trees that cannot be relocated or removed without a permit. No trees protected by this ordinance were observed in the City's portion of the survey area.

In addition, the County of Los Angeles' Oak Tree Ordinance protects any tree of the oak genus that is 25 inches or more in circumference (8 inches in diameter) as measured 4.5 feet above mean natural grade; in the case of oaks with more than one trunk, the ordinance protects those trees with a combined circumference of any 2 trunks of at least 38 inches (12 inches in diameter) as measured 4.5 feet above mean natural grade. This ordinance also covers Heritage Oak Trees, which are defined as any oak tree measuring 36 inches or more in diameter at 4.5 feet above the natural grade, or any oak tree having significant historical or cultural importance to the community, notwithstanding that the tree diameter is less than 36 inches. No oak trees are present on or near the proposed trail alignment or pedestrian bridge.

Therefore, the proposed project would not conflict with the Cities of Culver City's or Los Angeles' or the County's tree ordinances and no mitigation would be required.

f) No Impact

Segment C is not located in a Significant Ecological Area (SEA), as designated by the County (County of Los Angeles 2015). The Ballona Wetlands SEA is the nearest SEA, located approximately 4.1 miles southwest of Segment C. The proposed trail would not impact this SEA.

The Baldwin Hills are also not located within the boundaries of an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). There are two NCCPs in Los Angeles County. The Palos Verdes Peninsula NCCP covers 8,661 acres and provides a reserve system of 1,428 acres at the southwestern end of the County (over 13 miles south of the Baldwin Hills) (CDFW 2013). The West Mojave Plan covers 9.3 million acres of the western portion of the Mojave Desert, which includes the Antelope Valley area of Los Angeles County (northeastern section of Los Angeles County and nearly 40 miles northeast of the Baldwin Hills). This NCCP is being amended at this time (BLM 2012).

The Habitat Conservation Plan (HCP) that is located nearest the Baldwin Hills area is the Newhall HCP along the Santa Clara River, west of I-5 (San Marino Environmental Associates 2004). The Baldwin Hills area is located over 30 miles southeast of the Newhall HCP area.

These NCCPs and HCP would not be affected by the Project due to distance and differences in ecological systems at the Baldwin Hills area and the areas covered by these NCCPs and HCP. Therefore, no conflict with an HCP or NCCP would occur with the Project.

4.4.3 Regulatory Requirements

From Section 4.9, Hydrology and Water Quality

RR 4.9-1 Project construction shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002, or the latest approved general permit). This General Permit requires construction activities (including demolition, clearing, grading, excavation, and other land-disturbing activities) that result in the disturbance of one acre or more of total land area to file and submit a Notice of Intent (NOI); Risk Assessment; Site Map; Storm Water Pollution Prevention Plan (SWPPP); annual fee; and a signed certification statement to the State Water Resources Control Board prior to construction. In order to obtain coverage under the Construction General Permit, a project-specific SWPPP shall be prepared, which shall contain Best Management Practices (BMPs) that would be implemented to reduce or eliminate construction-related pollutants in the runoff.

As part of the SWPPP preparation and implementation, the design-build contractor shall also comply with the County of Los Angeles' Construction Site Best Management Practices Manual that contains the County's requirements for BMPs to include in the SWPPP and the implementation of BMPs during construction.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with these State and County regulations, including the filing of the NOI and preparation of the SWPPP prior to construction activities and the

implementation of BMPs and other items in the SWPPP during construction activities for the proposed project.

4.4.4 Mitigation Measures

MM 4.4-1 Prior to vegetation clearing and the start of construction activities for Segment C, the contractor shall provide protective fencing around the Southern California black walnut trees in the parking lot of the Baldwin Hills Scenic Overlook. The protective fencing shall be placed along the dripline of the trees. No ground disturbance or other work shall be performed within the fencing limits.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall implement this MM prior to and during construction activities.

MM 4.4-2 In order to avoid impacts on nesting birds and raptors (common or special status), construction activities shall be conducted during the non-breeding season (i.e., generally between September 16 and February 14 for migratory birds; July 1 and January 31 for nesting raptors), to the extent feasible.

If project timing requires that construction occur between February 1 and September 15 (incorporating the typical breeding season for migratory birds and raptors), then a pre-construction nesting bird/raptor survey (or multiple surveys) shall be conducted by a qualified Biologist within three days prior to disturbance within 500 feet of the project impact area to determine the presence or absence of active nests. Any nest found during the survey efforts shall be mapped on the construction plans. If no active nests are found, no further mitigation would be required.

If an active nest is located within or adjacent to the construction area and the Biologist determines that work activities may impact nesting, s/he shall demarcate an appropriate buffer zone around the nest. The size of the buffer may vary depending on site features, the sensitivity of the species, and the type of construction activity, but shall be designed to prevent disruption of nesting activity. Only limited construction activities (if any) shall be approved by the Biologist to take place within the buffer zone. The buffer zone restrictions shall be suspended once the Biologist determines that nesting activity has ceased and fledglings have left the nest.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall hire a qualified Biologist to implement this MM, and the Contractor shall comply with the Biologist's recommendations prior to and during construction activities.

MM 4.4-3 To mitigate for the loss of California brittle bush–California sagebrush scrub, California brittle bush–California sagebrush–coyote brush scrub, and coyote brush scrub/needle grass grassland, prior to issuance of a grading permit, the contractor shall preserve or restore sage scrub habitat either on-site or at a suitable off-site location at a ratio no less than 1:1. Any habitat area proposed for preservation in order to meet the 1:1 criterion shall be located in a permanent open space or shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA. Mitigation areas shall not be located within fuel modification zones. In

addition, it should be noted that type conversion of existing native communities shall not occur (e.g., areas of needle grass grassland, a native vegetation type, shall not be used as a mitigation site for sage scrub restoration).

A Sage Scrub Restoration Program shall be prepared and implemented by, or in consultation with, a qualified native plant revegetation specialist. The Restoration Program shall be in accordance with a landscape palette approved by the Los Angeles County Department of Regional Planning (LACDRP). Restoration shall consist of seeding and planting containers of appropriate sage scrub species.

If on-site preservation is used to satisfy the mitigation, a qualified Biologist shall mark the limits of sage scrub communities (i.e., California sagebrush scrub, disturbed California sagebrush scrub, California brittle bush–California sagebrush scrub, California brittle bush–California sagebrush–coyote brush scrub, and coyote brush scrub/needle grass grassland) near the construction area. Construction limits shall be flagged in the field, and no earth-moving equipment shall be allowed in these areas.

If off-site restoration is used to satisfy the mitigation, the contractor shall hire a qualified Biologist to identify a suitable restoration location near existing sage scrub communities in the BHRCA parcel and to prepare and implement a Sage Scrub Restoration Program. The Restoration Program shall include performance standards that shall apply to the revegetation of sage scrub. Revegetation shall be considered successful if the percent cover and species diversity of the restored and/or created habitat areas are similar to the percent cover and species diversity of adjacent existing habitats, as determined by quantitative testing of existing and restored and/or created habitat areas.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall hire a qualified Biologist to implement this MM, and the Contractor shall comply with the Biologist's recommendations prior to and during construction activities.

MM 4.4-4 The proposed landscaping and revegetation for the proposed project shall incorporate the use of native plant species to the maximum extent practicable. The species selected for installation shall be in accordance with a landscape palette approved by the Los Angeles County Department of Public Works (LACDPW). To minimize the potential for invasive, exotic plant species to escape into natural open space areas adjacent to the proposed project, the plant palette shall avoid the use of exotic plant species that are known to be highly invasive.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall hire a qualified professional landscape architect and/or habitat restoration specialist to review the landscape palette prior to installation.

MM 4.4-5 Areas under the jurisdiction of the Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Wildlife (CDFW) shall be avoided to the maximum extent practicable. If these areas will be impacted by the proposed project, prior to the approval of the project plans and specifications, the County shall confirm that regulatory permit authorizations from the RWQCB and the CDFW (or authorization to proceed without such permits) have been obtained for

the project. Impacts to jurisdictional resources shall be determined considering both permanent and temporary impacts resulting from project construction, as well as long-term maintenance that can disturb the open drainage channel and may be characterized as dredge or fill within jurisdictional waters. The project application shall be obligated to implement/comply with the mitigation measures required by the resource agencies regarding impacts on their respective jurisdictions, which may include restoration, enhancement, replacement, or preservation of on-site or off-site jurisdictional areas at a minimum ratio of 1:1 of the lost jurisdictional value. Habitat preservation, replacement or restoration that will result in no net loss shall be used to offset impacts, as outlined in the permit conditions.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The design-build contractor shall obtain the necessary resource agency permits and shall comply with permit conditions prior to and during construction activities.

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

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall implement this MM as part of MM 4.1-1.

4.4.5 Comparison of Impacts with Park to Playa Trail IS/MND

Impacts of project activities in Segment C on biological resources would be similar to the impacts of the Park to Playa Trail, as discussed in the previous IS/MND. However, additional requirements include measures to prevent the spread of invasive, exotic plant species into adjacent open space and to reduce impacts on nocturnal wildlife by minimizing the effect of night lighting.

4.5 CULTURAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

A Phase I Cultural Resources Assessment was completed by BonTerra in November 2012 for the Park to Playa Trail IS/MND. The findings of this report remain applicable to Segment C and are summarized below. The report provided in Appendix C (BonTerra 2012d).

4.5.1 Environmental Setting

The general framework for Southern California prehistory can be defined by the following prehistoric periods:

- Horizon I: Early Man or Paleo-Indian Period (11,000 BCE[5] to 7,500 BCE)
- Horizon II: Milling Stone Assemblages (7,500 BCE to 1,000 BCE)
- Horizon III: Intermediate Cultures (1,000 BCE to 750 CE[6])
- Horizon IV: Late Prehistoric Cultures (750 CE to 1769 CE)

At the time of European contact, the Baldwin Hills area was the home of the Gabrielino. The Gabrielino and their descendants became associated with Mission San Gabriel Arcángel, which was established on September 8, 1771, in the San Gabriel Valley. Today, these people are sometimes referred to as the *Tongva,* although the term apparently originally (i.e., before the arrival of Euro-Americans) referred to the inhabitants of the San Gabriel Valley only.

The ancestral Gabrielino arrived in the Los Angeles Basin probably before 500 BCE as part of the so-called Shoshonean (Takic speaking) Wedge from the Great Basin region and gradually displaced the indigenous peoples, probably Hokan speakers. Large, permanent villages were established in the fertile lowlands along rivers and streams and in sheltered areas along the coast. Eventually, Gabrielino territory encompassed the watersheds of the Los Angeles, San Gabriel, Rio Hondo, and Santa Ana Rivers, which includes the greater Los Angeles Basin, to perhaps as far south as Aliso Creek, as well as portions of the San Fernando, San Gabriel, and San Bernardino Valleys.

5 BCE is defined as "Before Common Era" and generally refers to that time period commonly referred to as "Before Christ" (B.C.).

6 CE is defined as "Common Era" and generally refers to that time period commonly referred to as "annō Dominī" (A.D.).

The Gabrielino communities of *Saa'anga* and *Waachnga* were located in the vicinity of Ballona Creek near the Baldwin Hills; however, the location of *Waachnga* remains in dispute. Most of the Gabrielino villages were abandoned around 1805 due to rapid decline from European-introduced diseases.

The Baldwin Hills were part of the Rancho Cienega O Paso de la Tijera, which was granted to Vicente Sanchez by the Governor of Alta California in 1843. The Rancho La Tijera adobe at 3725 Don Felipe Drive is listed as Los Angeles Historical Cultural Landmark 487. This adobe was built between 1790 and 1795 on the ranch owned by Don Vicente Sanchez. It is located north of Stocker Street near the eastern end of the Park to Playa Trail, approximately 2.0 miles east of the site for Segment C.

Sanchez died in 1850 and left the ranch to his son, Tomas, who sold it in 1875. Four men bought the property: Francis Pliney Fisk Temple, Arthur J. Hutchinson, Henry Ledyard, and Daniel Freeman. When Temple defaulted on his loan to EJ "Lucky" Baldwin, Baldwin foreclosed on Temple's portion of the ranch and bought out the other property owners. Baldwin died in 1909 and left his property (consisting of the Baldwin Hills, View Park, and Windsor Hills) to his heirs. Stocker Street was named after his daughter Clara Baldwin Stocker.

Oil was discovered in the Baldwin Hills area in 1924, and oil and gas exploration, production, processing and associated activities have occurred throughout the Baldwin Hills and Blair Hills areas since that time. In 1931, the Olympic Village (consisting of 500–600 dwelling units, post and telegraph offices, an amphitheater, a hospital, a fire department, and a bank) was built in the Baldwin Hills for the 1932 Los Angeles Olympic Games, but the buildings were removed after the games. The site first became the Sunset Fields Golf Course and was later developed with multi-family apartment complexes. The Olympic Forest was created in the KHSRA in 1984, where representative tree species from each nation that came to the 1984 Olympic Games were planted.

4.5.2 Impact Analysis

a) No Impact

The Village Green (Baldwin Hills Village) at 5300 Rodeo Road is a historic district included in the National Register of Historic Places (NRHP) and is a City of Los Angeles Historical Cultural Landmark. It is a multi-family residential community that is an example of progressive idealism designed by Reginald Johnson. This district was built between 1941 and 1942 and is located between La Brea Avenue and La Cienega Boulevard, approximately 0.5 mile northeast of the site for Segment C.

The Baldwin Hills Dam was built in 1951 in what is now Janice's Green Valley in the KHSRA. The dam collapsed in December 1963 and was then backfilled. In 1982, 500 acres of the Baldwin Hills was purchased by the State for park purposes. Janice's Green Valley is approximately 0.6 mile southeast of the site for Segment C. The Baldwin Hills Master Plan states that the historic home of the Chandler family is located on the western ridgeline, but this residence is not identified as a historic structure on local, State, or national registers (CDPR 2002b).

The Collins-Furthmann Mansion, located at 3691–3801 Lenawee Avenue, is listed as Los Angeles Historical Cultural Landmark 502. This mansion is located 0.3 mile north of the site for Segment C. Various other Los Angeles City Historical Cultural Landmarks are located farther from the site.

While there are historic structures in the project area, no building demolition activities are proposed as part of Segment C. The proposed trail would be located on vacant land and would

not be located near historic structures. The pedestrian bridge will be located over La Cienega Boulevard and would also not involve demolition activities. The nearest historic structures, the Village Green and the Collins-Furthmann Mansion, would not be affected by the project. Therefore, no impact on historical resources would occur with implementation of the project.

b) Less than Significant Impact With Mitigation

Fourteen previous archaeological surveys included portions of the Park to Playa Trail alignment, with four resources found near the alignment. These include three prehistoric archaeological sites and one historic site.

- **CA-LAN-1399:** This site was recorded by Stewart in 1988 as a small lithic and shell scatter; it is immediately adjacent to La Cienega Boulevard and north of the lake in the KHSRA.
- **CA-LAN-2966:** This site was recorded by L. Solis in 2000 as consisting of several groundstone fragments and fire-affected rock. It is located at the southern edge of the Vista Pacifica development, west of La Cienega Boulevard, and immediately west of the closed elementary school at the northern edge of the Inglewood oilfield. The site was discovered during grading for the Vista Pacifica development, and all cultural material was collected at that time.
- **CA-LAN-2967H:** This site was recorded by L. Solis in 2000 as a historic period refuse deposit of household items southeast of the water tanks, northeast of Culver City Park, and west of the Baldwin Hills Scenic Overlook. The site's constituents were collected and the site is considered destroyed.
- **CA-LAN-2968:** This site was recorded by L. Solis in 2000 as a lithic scatter with burned animal bone and rock, as well as shell fragments among modern refuse. It is located on a plateau east of the water tanks and northwest of the Baldwin Hills Scenic Overlook. It is presumed destroyed.

An archaeological survey was conducted to determine whether any cultural resources remain exposed on the surface of the Park to Playa Trail alignment (including the site for Segment C) or whether any cultural resources can reasonably be expected to exist in the subsurface. No cultural resources were discovered during the survey.

While the NAHC Search of the Sacred Lands File did not identify the presence of Native American cultural resources along the Park to Playa Trail alignment, consultation with local Native American groups and individuals was conducted. The Gabrielino/Tongva San Gabriel Band of Mission Indians, through its Chairman, Anthony Morales, stated that the areas around the Ballona Wetlands, immediately to the west and south of the Baldwin Hills, were a major center of prehistoric native life and due diligence must be taken during construction of the project, including Native American and archaeological monitoring.

Assembly Bill (AB) 52 requires lead agencies to consult with California Native American Tribes that request such consultation prior to the agency's release of a Notice of Preparation (NOP) of an EIR, or notice of an MND, or Negative Declaration (ND) on or after July 1, 2015. While AB 52 places the burden of initiating consultation on the tribes, the law's provisions do not require the NAHC to provide lead agency information to tribes until July 1, 2016, and CEQA revisions are not required to be adopted until that date. Thus, there may be a one-year delay with the initiation of consultation as required by AB 52.

In the interim, a list of local tribes in the area was requested from the NAHC on August 24, 2015. On October 2, 2105, Native American tribes on the list were given information about the project and an opportunity to comment prior to the public circulation of the Notice of Intent. No responses have been received to date.

While previous development in the area may have disturbed archaeological resources, undeveloped areas could still support resources. Since there have been discovered resources near the Park to Playa Trail alignment and a local Native American group has recommended monitoring, MM 4.5-1 was developed to describe the procedures for monitoring and the protocols to be followed during construction and in the event that cultural resources are discovered during grading, excavation, and ground disturbance. Since cultural resources have been found near the site for Segment C, implementation of MM 4.5-1 would reduce potentially significant adverse impacts on undiscovered archaeological resources that may be disturbed during project construction. Impacts would be less than significant after mitigation.

c) Less than Significant Impact With Mitigation

A paleontological records search by Samuel McLeod, Vertebrate Paleontologist at the Natural History Museum of Los Angeles County (NHMLAC), revealed that no fossil vertebrate localities are recorded along the Park to Playa Trail, including the site for Segment C.

Surficial deposits in the most elevated areas consist of older Quaternary Alluvium. There are no fossil localities from the older Alluvium in the Baldwin Hills; however, fossils have been recovered from just north of the Baldwin Hills along Rodeo Road, and included mammoth (*Mammut*), sabertooth cat (*Smilodon*), camel (*Camelops*), and fossilized human (*homo*) remains.

Underlying the alluvium and exposed downslope on the hills are deposits of marine early Pleistocene San Pedro Sand and the Inglewood Formation. Fossils of bonito shark (*Isurus*) and other fish were recovered immediately east of the Baldwin Hills in these formations.

Excavations into the alluvium are unlikely to uncover significant vertebrate fossil remains. Deeper excavations into the older deposits, however, may encounter fossils. Therefore, the NHMLAC recommends that any substantial excavations that penetrate older alluvial material should be monitored by a qualified Paleontologist.

Although the proposed surface trail will only involve shallow excavations, the proposed pedestrian bridge would require deeper excavations. Fossil material could be encountered during the excavation activities for construction of the proposed bridge. Since fossil localities exist in similar sedimentary deposits near the trail alignment, implementation of MM 4.5-2 would ensure that significant paleontological resources are not inadvertently disturbed or destroyed during ground excavation. Impacts would be less than significant after mitigation.

d) Less than Significant Impact

Previous ground disturbance activities for the construction of existing developments and infrastructure near the site, as well oil production activities at the site, would have uncovered human remains if they are present. Thus, the alignment of Segment C is not expected to contain human remains, and the proposed trail would have no potential to disturb human remains.

The record search and site survey also did not provide any indication that human remains are present on or near the trail alignment. The Holy Cross Cemetery is located north of Slauson Avenue, approximately 1.2 miles south of the site for Segment C. No impact to this cemetery or other cemeteries in the area would occur with the project.

However, should grading and excavation for construction of Segment C unearth unknown human remains or unknown burials, compliance with existing regulatory requirements under the *California Health and Safety Code* and the *California Public Resources Code,* as discussed under RR 4.5-1 below, would ensure that potential impacts to human remains would be less than significant.

4.5.3 Regulatory Requirements

RR 4.5-1 In accordance with Section 7050.5 of the *California Health and Safety Code,* if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains.

If the County Coroner determines that the remains are or are believed to be Native American, s/he shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with Section 5097.98 of the *California Public Resources Code,* the NAHC shall immediately notify the persons it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants shall complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the BHRCA, the disposition of the human remains. The MLD's recommendation shall be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the BHRCA rejects the MLD's recommendations, the agency shall rebury the remains with appropriate dignity on the property in a location that will not be subject to further subsurface disturbance (14 *California Code of Regulations* §15064.5[e]).

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to the approval of the County), and the contractor shall comply with this regulation upon the discovery of human remains during ground-disturbing activities.

4.5.4 Mitigation Measures

MM 4.5-1 Prior to and during construction activities, an Archaeologist shall be present at the pre-grade conference; shall establish procedures for archaeological resource surveillance; and shall establish, in cooperation with the Project Engineer, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of artifacts, as appropriate. If archaeological resources are found to be significant, the Archaeologist shall determine appropriate actions, in cooperation with the BHRCA, for exploration and/or salvage. Work may proceed in other areas, subject to the direction of the Archaeologist.

For any archaeological resource found during project ground-disturbing activities, the Archaeologist shall first determine whether it is a "unique archaeological resource" pursuant to Section 21083.2(g) of the *California Public Resources Code* (PRC) or a "historical resource" pursuant to Section 15064.5(a) of the State CEQA Guidelines. If the archaeological resource is determined to be a "unique

archaeological resource" or a "historical resource", the Archaeologist shall formulate and implement a mitigation plan in consultation with the BHRCA that satisfies the requirements of the above-referenced regulations.

If the Archaeologist determines that the archaeological resource is not a "unique archaeological resource" or "historical resource", s/he may record the site and submit the recordation form to the California Historic Resources Information System at the South Central Coastal Information Center at California State University, Fullerton.

The Archaeologist shall prepare a report of the results of any study prepared as part of a testing or mitigation plan, following accepted professional practice. The report shall follow the guidelines of the California Office of Historic Preservation. Copies of the report shall be submitted to the BHRCA and to the California Historic Resources Information System at the South Central Coastal Information Center at California State University, Fullerton.

Prior to the start of construction activities, the County shall check that the design-build contractor has retained a qualified Archaeologist to implement this MM, including the monitoring of grading activities and the salvage and catalogue of archaeological resources, as necessary.

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

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to the approval of the County), and the contractor shall comply with this regulation upon the discovery of fossil resources during ground-disturbing activities. The design-build contractor shall hire a paleontologist (subject to approval by the County) to perform the resource evaluation and disposition, as necessary.

4.5.5 Comparison of Impacts with Park to Playa Trail IS/MND

Segment C would have the same impacts on cultural resources as discussed in the previous IS/MND for the Park to Playa Trail and the same regulatory requirement (RR 4.5-1) and mitigation measures (MM 4.5-1 and MM 4.5-2) would be implemented as part of Segment C, as listed above. Impacts would be less than significant after mitigation.

4.6 GEOLOGY AND SOILS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

4.6.1 Environmental Setting

Local Geology

The Baldwin Hills are located in the Los Angeles Basin, which is a relatively flat area bound by mountains and hills along the north, northeast, east, and southeast and by the Pacific Ocean to the west and southwest. The basin slopes gently to the south, except for a series of hills that extend in a southeasterly direction from the Santa Monica Mountains to Newport Beach (which include the Baldwin Hills and the hills at the Palos Verdes Peninsula). The Los Angeles Basin is overlain by marine sediments deposited in Quaternary time (past 2.0 million years), while the Baldwin Hills are made up of more than 10,000 feet of sedimentary rocks from the Tertiary period (past 65 to 2.6 million years) (CDOC 2010a). The hills consist of crystalline basement rocks that are overlain by late Quaternary deposits of the Inglewood Formation, Baldwin Hills sandy gravel, Culver sand, Fox Hills relict paleosol, floodplain deposits, and artificial fill (CDMG 1982).

The lower portion of the Baldwin Hills is made up of clay-rich sandstones of the Inglewood Formation, which are generally dense and moderately expansive. The Inglewood Formation is overlain by the coarser and more friable Culver sand and Baldwin Hills sandy gravel. The Culver sand layer is approximately 100 feet thick and is poorly cemented. The Baldwin Hills sandy gravel is 50 to 100 feet thick and is found on over $^2/_3$ of the hills on Culver sand or directly on the Inglewood Formation. The Fox Hills relict paleosol is found on and overlies the Baldwin Hills sandy gravel and is well-cemented. Floodplain deposits are found at the edges and canyons, and artificial fill is found under roads, oil wells, and buildings (CDMG 1982).

The site is underlain by Quaternary age marine and non-marine sedimentary materials on the hillside areas and Holocene alluvial/colluvial deposits in the major stream course parallel to and west of La Cienega Boulevard. Construction activities associated with La Cienega Boulevard and oilfield activities have placed fill soils and created cut and fill slopes throughout the project area. Natural formation materials beneath the fill soils include the Culver Sand and Inglewood formation, which are dense to very dense and very stiff to hard (GPI 2015).

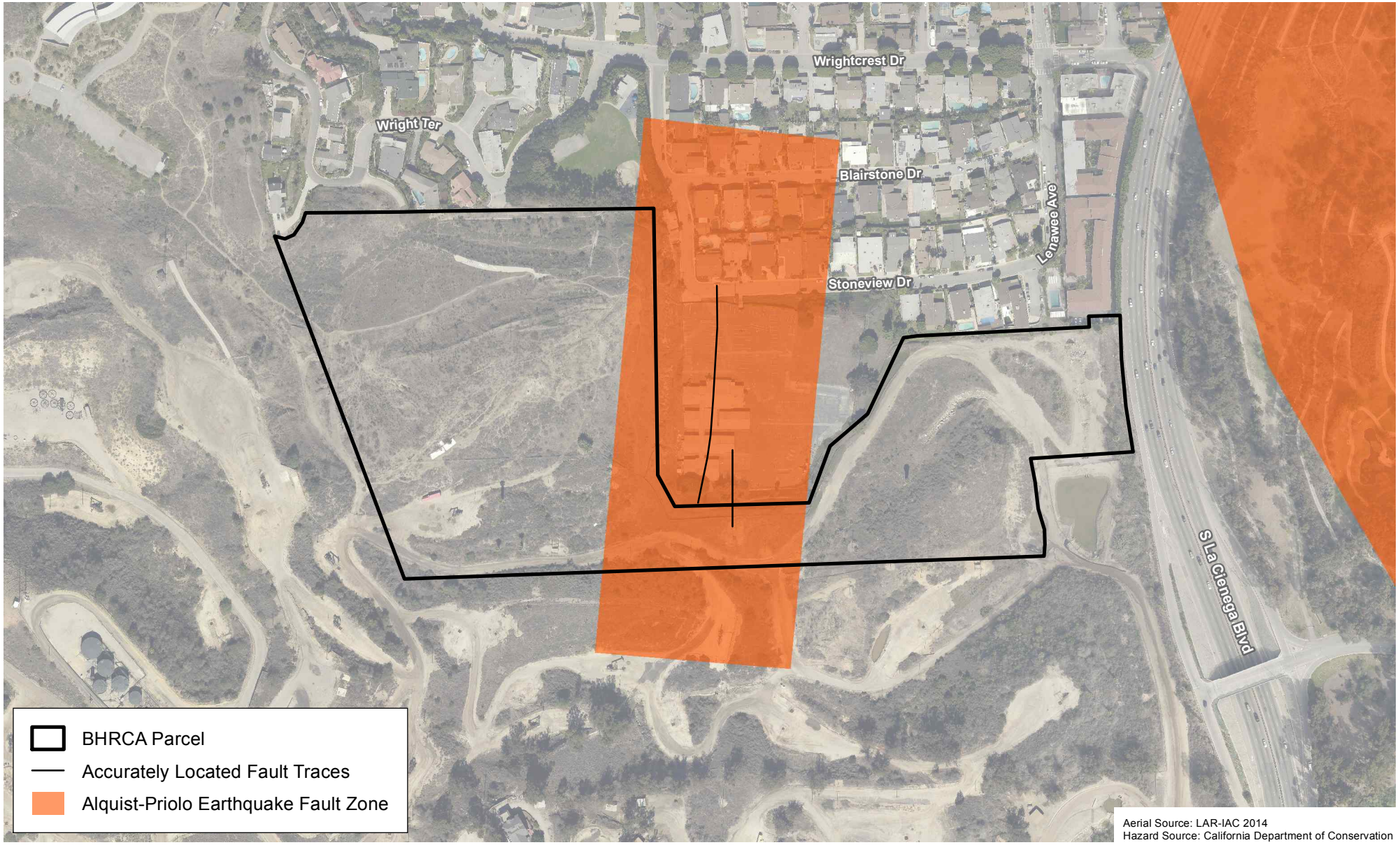
Seismic Characteristics

The Baldwin Hills are postulated to have formed in recent geologic time (within the past 100,000 to 150,000 years) due to tectonic forces along the Newport-Inglewood Fault Zone. The Newport-Inglewood Fault is a series of discontinuous northwest-to-southeast-trending faults and subsidiary faults that extend from the Santa Monica Mountains in a southeasterly direction to Newport Beach. It continues into San Diego County as the Rose Canyon Fault. This fault has seven segments, with the 1920 Inglewood earthquake and the 1933 Long Beach earthquake occurring along the Los Angeles Basin segment of this fault. This segment makes up 28 kilometers of the total 209-kilometer-long fault (USGS 2012). The section of the fault segment passing through the KHSRA has experienced historic (past 200 years) displacement, while the segment to the northwest of the Baldwin Hills has experienced displacement in Holocene time (past 11,700 years) (CDOC 2010b). The maximum moment magnitude on the Newport-Inglewood Fault is estimated at 7.1 (CGS 2012).

As shown in Exhibit 4-6, an Alquist-Priolo Special Studies Zone has been designated along the Newport-Inglewood Fault, which runs northwest to southeast through the Baldwin Hills, east of La Cienega Boulevard. An outlying fault creep has been identified on a steep slope that runs along the western edge of the former school/Stoneview Nature Center site in the Blair Hills area (CGS 1986a, 1986b, 2014). The fault rupture hazard investigation that was performed for the Stoneview Nature Center also identified several strike and dip of faults in trench excavations throughout that site (AFW 2015).

Peak ground acceleration on the proposed trail alignment due to an earthquake event on the Newport-Inglewood Fault is estimated by the California Geological Survey (CGS) to be as much as 0.441 g (where g = acceleration of gravity) on firm rock (CGS 2012).

The Seismic Hazard Mapping Act identifies areas subject to liquefaction, landslides, or other ground failure to provide cities with information to use in the Safety Element of their General Plans. Liquefaction hazards have been identified along Ballona Creek; west of Jefferson Boulevard; and areas north and east of the Blair Hills and Baldwin Hills (CGS 1999a, 1999b). Although no liquefaction hazards have been identified on the site, the Geotechnical Investigation states that potentially liquefiable conditions are present along La Cienega Boulevard and areas to the west (GPI 2015).



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Alquist-Priolo Special Studies Zone

Exhibit 4-6

Segment C of the Park to Playa Trail

N W E S

300 150 0 300 Feet

BonTerra PSOMAS

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Landslides

Landslides have occurred at the Blair Hills and Baldwin Hills, including the site for Segment C, and erosion has been observed in the KHSRA. Exhibit 4-7 also shows areas where the CGS has identified areas where previous landslides have occurred and where, due to topographic, geological, geotechnical, and subsurface water conditions, there is a potential for earthquake-induced landslides or permanent ground displacement (CGS 1999a, 1999b).

Ground Elevations

The proposed trail alignment has elevations ranging from around 400 feet above msl at the Baldwin Hills Scenic Overlook; between 200 to 300 feet above msl at the site for Segment C; and 200 to 380 feet above msl at the KHSRA where the pedestrian bridge is proposed.

Most streets in the area have been constructed at the bottom of natural canyons. Therefore, the side slopes of the canyons generally define the areas along the roadway shoulders of La Cienega Boulevard, La Brea Avenue, and Stocker Street.

Soils

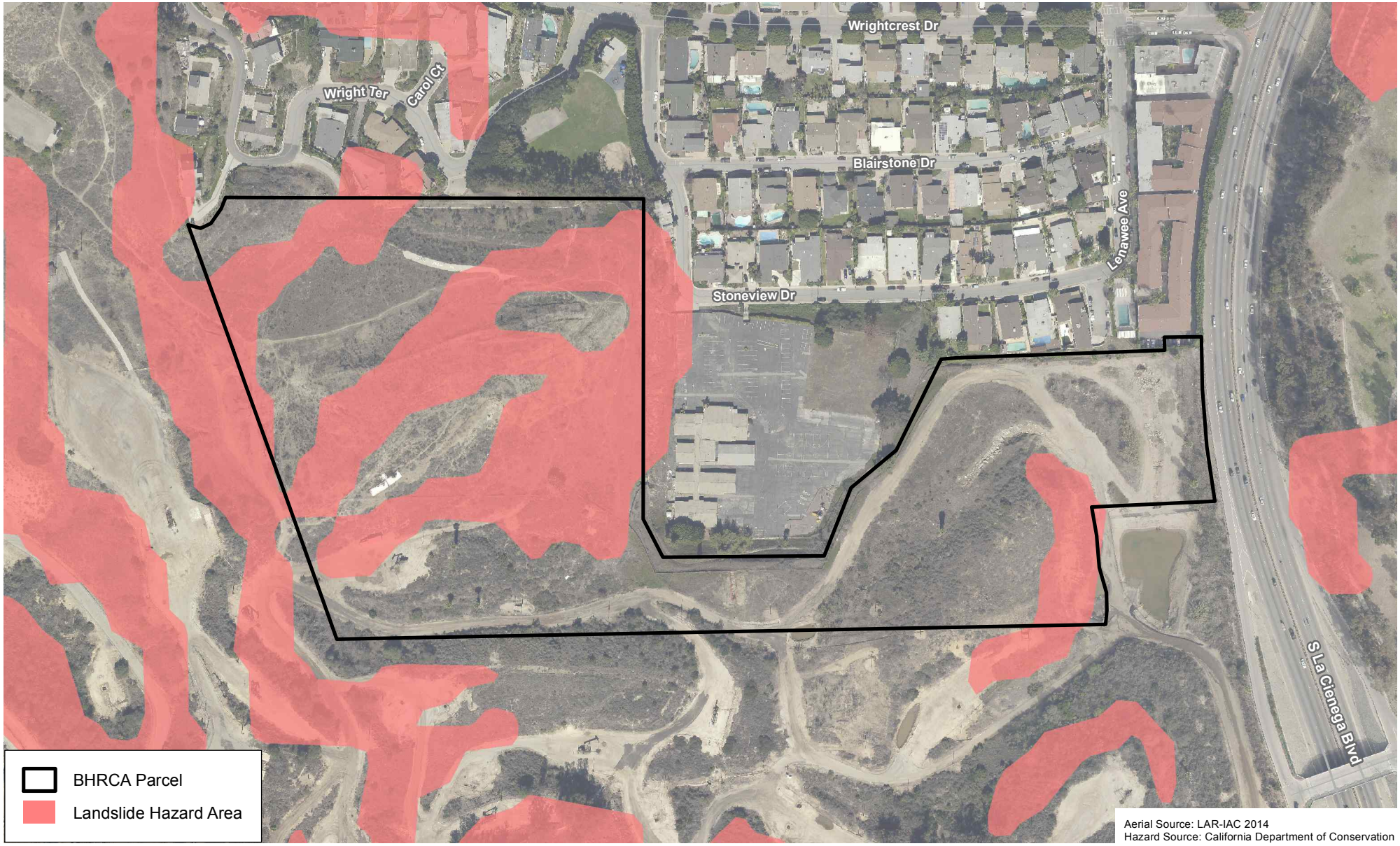
The United States Department of Agriculture's (USDA) Report and General Soil Map for Los Angeles County indicates that the project area is underlain by soils of the Ramona-Placentia association, 2 to 5 percent slopes. Ramona soils have a brown to reddish-brown, heavy loam, loam or sandy loam surface (about 18 inches thick), underlain by 30 inches of brown to reddish-brown, dense clay loam or clay. The substratum is brown to reddish-brown loam or light clay loam. These soils are well-drained and have slow subsoil permeability. Placentia soils have a brown to reddish-brown loam, or sandy loam surface (over 18 inches thick) and 18-inch-thick subsoils consisting of dense, dark, reddish-brown clay loam. The substratum is brown loam. These soils are moderately well drained and have slow subsoil permeability. This association has high soil expansion potential, moderate corrosivity, severe septic tank limitations, and moderate limitations to allowable soil pressure (USDA 1969).

The Geotechnical Investigation by GPI indicates the site is underlain by undocumented fill soils, 3 to 6 feet in depth. The fill soils consist of slightly moist to moist silty sands, clayey sands and sandy silts with varying amounts of gravel. West of La Cienega Boulevard, underlying natural materials consist of soft to stiff sandy silts, sandy clays and silty clays 15 to 18 feet below the ground surface (bgs). Bedrock materials were encountered at 45 and 70 feet bgs. East of La Cienega Boulevard, underlying natural materials consist of medium dense to very dense silty sands and sands and hardy sandy silts and silts. Siltstone bedrock was encountered at 50 and 90 feet bgs (GPI 2015).

4.6.2 Impact Analysis

a)(i) Less Than Significant Impact

The Newport-Inglewood Fault runs through the Baldwin Hills, and displacement of surface soils has been observed in the area. An Alquist-Priolo Special Studies Zone has also been designated along the Newport-Inglewood Fault in the KHSRA. This earthquake zone applies to areas within 0.25 mile of an active fault (i.e., a fault that has moved 1 or more times in the last 10,000 years) and where geologic investigations are required to ensure that structures for human occupancy are not built across the trace of an active fault.



Aerial Source: LAR-IAC 2014
Hazard Source: California Department of Conservation

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Landslide Hazards

Exhibit 4-7

Segment C of the Park to Playa Trail

N
W E
S

250 125 0 250
Feet

BonTerra PSOMAS

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The pedestrian bridge in the KHSRA would be located near the Alquist-Priolo Special Studies Zone for the Newport-Inglewood Fault and may be subject to fault rupture hazards. A scrap of the Newport-Inglewood Fault is also identified near the western edge of the site for the future Stoneview Nature Center and several strike and dip of faults were found in trench excavations on the nature center site (AFW 2015). Thus, the proposed trail may be subject to fault rupture hazards. However, no habitable structures are proposed by the project and trail use at any one location would be limited to several minutes each time.

Compliance with the California Building Code[7] (CBC, see RR 4.6-1) and the recommendation of the geotechnical investigation for the project (RR 4.6-2) would ensure the structural stability of the pedestrian bridge and elevated boardwalk. Also, the type and limited size of the other trail improvements (i.e., interpretive node, steps, natural trail, signs, revegetation, and fencing) also preclude the potential for major threats to life and property in the event of surface rupture. As such, impacts due to surface rupture hazards along the trail would be less than significant with compliance with existing regulations.

a)(ii) Less Than Significant Impact

Earthquake events along the Newport-Inglewood Fault would cause major groundshaking along the proposed Segment C trail. In addition, earthquakes in the Southern California region would also cause moderate to strong groundshaking in the project area. The peak ground acceleration along Segment C is estimated at 0.727 gravity (g) due to earthquake events along the Newport-Inglewood Fault Zone (CDOC 2015).

Strong groundshaking would not affect the proposed at-grade trail, revegetation, and fencing, but could affect the stability of proposed pedestrian bridge and boardwalk. However, these improvements would be constructed in compliance with pertinent provisions of the California Building Code (as RR 4.6-1), which would ensure the structural stability of the proposed bridge and boardwalk and would ensure the project is constructed in accordance with the recommendations of the geotechnical investigation (as RR 4.6-2) to account for seismic hazards on site. Compliance with these RRs would prevent damage to the proposed trail, pedestrian bridge and boardwalk from strong seismic ground shaking. Impacts would be less than significant.

a)(iii) Less Than Significant Impact

The Geotechnical Investigation indicates the presence of potentially liquefiable conditions along La Cienega Boulevard and areas to the west, due to shallow groundwater and geologically younger deposits such as alluvium/colluvium (GPI 2015). Thus, the proposed project may be exposed to liquefaction hazards. Compliance with pertinent provisions of the California Building Code (as RR 4.6-1) and the recommendations of the geotechnical investigation (as RR 4.6-2) would reduce liquefaction hazards and ensure the structural stability of the proposed bridge and boardwalk. Compliance with these RRs would prevent damage to the proposed trail, pedestrian bridge and boardwalk from potential liquefaction. Impacts would be less than significant.

a)(iv) Less Than Significant Impact

The Inglewood Formation, Culver sand, and Baldwin Hills sandy gravel, which make up the hills, are susceptible to landslides. Ancient landslides have occurred in the Baldwin Hills area due to these unstable soils and steep slopes, with the majority occurring on the north side of the hills. Older developments that were built on the hills before the adoption of more stringent regulations

[7] The CBC has been adopted by reference by all jurisdictions in the State, including the County of Los Angeles and the cities of Los Angeles and Culver City.

for grading of slopes, fill placement, drainage, and revegetation also contribute to the potential for landslides, mudslides, slumping, and erosion in the Baldwin Hills.

Heavy rainfall has resulted in landslides and slope erosion in the area in 1969, 1978, and 1980. Debris flows in gullies and canyons have occurred during heavy rains, and existing trail sections in the KHSRA have eroded in some areas. The proposed Segment C trail would go through areas identified by the CGS as having landslide hazards. Thus, trail users and trail improvements would be exposed to potential landslide hazards.

Grading and excavation associated with the proposed trail, steps, boardwalk, and pedestrian bridge would involve the creation of new slopes and ground disturbance that could increase or pose new landslide hazards. Trail improvements and amenities built on steep slopes could also undermine soil stability and could cause landslides.

However, no habitable structures are proposed with the project, and trail design and construction would have to comply with RRs 4.6-1 and 4.6-2. Structural integrity would be maintained through engineering design and construction, based on the recommendations of the geotechnical investigation for the project. The type and limited size of trail improvements also preclude the potential for major threats to life and property due to landsliding on any one section of the proposed trail. Therefore, impacts from landslides would be less than significant.

b) Less Than Significant Impact

As stated, erosion has occurred in various areas of the KHSRA and Baldwin Hills Scenic Overlook. Existing trails that follow the natural drainage flows (called fall line trails) have experienced erosion as storm waters erode the trail surfaces.

In the short term, ground disturbance associated with construction of Segment C may lead to the erosion of disturbed slopes. However, erosion-control and sediment-control Best Management Practices (BMPs) would be implemented as part of the Stormwater Pollution Prevention Plan (SWPPP) during construction of the project (as outlined in RR 4.9-1 in Section 4.9, Hydrology and Water Quality). This would limit erosion along the trail alignment, utility line excavation areas, and other disturbed areas.

In the long term, the disturbed ground surfaces may create erosion hazards, especially on steep slopes. However, trail switchbacks are proposed in areas with steep slopes (e.g., at the Baldwin Hills Scenic Overlook and near the proposed Stoneview Nature Center). Also, the trail would have a compacted surface and trench excavations along La Cienega Boulevard would be backfilled and revegetated or returned to existing conditions. Landscaping and revegetation of disturbed areas would reduce the potential for erosion on the slopes. No long-term adverse impacts related to erosion would occur.

Impacts related to erosion would be short-term during construction and would be less than significant.

c) Less Than Significant Impact

Oil drilling activities in the area since the 1920s have resulted in subsidence[8] in some portions of the Baldwin Hills. Data from the 1920s to the 1970s show that as much as ten feet of subsidence occurred at the center of the Inglewood oilfield. Subsidence was also observed near the Five

[8] Subsidence is defined as the settlement of overlying geologic materials due to the removal of large amounts of hydrocarbons and fluids.

Points intersection. Since the 1950s, water has been injected back into the oilfield to increase oil production. This water injection has also served to replace oil withdrawal and to reduce subsidence.

Segment C is proposed near areas with active drilling operations. While subsidence hazards may exist near the trail alignment, it would have minimal impact on the proposed trail. Also, the construction and use of the trail would not increase subsidence hazards in the area. No impacts related to subsidence would occur.

Buildings and infrastructure in the Baldwin Hills area have been exposed to geological hazards due to unstable soils; steep slopes; improper placement of fills; improper drainage control; urban runoff; improper vegetation cover; and animal burrowing. These have resulted in slope failure, landslides, soil movement, collapse, and other hazards causing structural damage to numerous buildings and residences in the area (CDMG 1982).

The Geotechnical Investigation has indicated that landsliding, ground subsidence, and ground lurching are unlikely if the project is built in accordance with current regulatory codes (GPI 2015). The proposed trail improvements would be built to current engineering standards and would not create or exacerbate geologic hazards to adjacent developments due to the limited size and type of trail improvements and distance from adjacent developments. To ensure the structural integrity of the pedestrian bridge, it may utilize caissons or piles for foundation support, depending on the soil characteristics at the bridge landings. Compliance with RRs 4.6-1 and 4.6-2 would ensure the structural integrity of proposed trail improvements and would avoid the creation of geologic hazards associated with subsidence, slope failure, landslides, soil movement, collapse, and other hazards. Impacts would be less than significant.

d) Less Than Significant Impact

The Fox Hills relict paleosol, Baldwin Hills sandy gravel, and Culver sand are not considered expansive soils, but the Inglewood Formation has moderate expansion potential. The Chino soil association has moderate soil expansion potential and the Ramona-Placentia soil association has high soil expansion potential. Thus, trail improvements could be exposed to ground instability due to soil expansion. However, no habitable structures are proposed as part of Segment C. Compliance with RR 4.6-1 and RR 4.6-2 would ensure that the engineering design and construction of proposed pedestrian bridge and steps account for site-specific soil conditions, including soil expansion potential. Thus, impacts would be less than significant.

e) No Impact

The proposed trail improvements for Segment C do not include restrooms, toilets, kitchens, or other facilities that may generate wastewater that would require sewage treatment and disposal through the public sewer system, septic tanks, or alternative wastewater disposal systems. The use and maintenance of the trail would not generate wastewater. There are restrooms in the KHSRA, Baldwin Hills Scenic Overlook, and Culver City Park that are located near Segment C and which may be used by trail users. Also, construction of the trail improvements would include the provision of portable toilets for use of the construction crew, with wastes collected for off-site disposal. Therefore, while surface soils have limitations to supporting septic tanks or alternative wastewater disposal systems, no septic tank systems are proposed with the project and no impact would occur.

4.6.3 Regulatory Requirements

RR 4.6-1 Project design and construction shall comply with Part 2 of Title 24 of the California Code of Regulations (California Building Code), which provides building standards for construction, alteration, moving, demolition, repair, maintenance, and use of all buildings or structures. The California Building Code standards were developed to safeguard public health and safety and facilitate emergency response.

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval by the County during the plan check process. Approved plans shall be implemented by the contractor.

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

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval by the County during the plan check process. Approved plans shall be implemented by the contractor.

From Section 4.9, Hydrology and Water Quality

RR 4.9-1 Project construction shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002, or the latest approved general permit). This General Permit requires construction activities (including demolition, clearing, grading, excavation, and other land-disturbing activities) that result in the disturbance of one acre or more of total land area to file and submit a Notice of Intent (NOI); Risk Assessment; Site Map; Storm Water Pollution Prevention Plan (SWPPP); annual fee; and a signed certification statement to the State Water Resources Control Board prior to construction. In order to obtain coverage under the Construction General Permit, a project-specific SWPPP shall be prepared, which shall contain Best Management Practices (BMPs) that would be implemented to reduce or eliminate construction-related pollutants in the runoff.

As part of the SWPPP preparation and implementation, the design-build contractor shall also comply with the County of Los Angeles' Construction Site Best Management Practices Manual that contains the County's requirements for BMPs to include in the SWPPP and the implementation of BMPs during construction.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with these State and County regulations, including the filing

of the NOI and preparation of the SWPPP prior to construction activities and the implementation of BMPs and other items in the SWPPP during construction activities for the proposed project.

4.6.4 Mitigation Measures

With compliance with the regulatory requirements above, project implementation would result in less than significant impacts on geology and soils; therefore, no mitigation is required.

4.6.5 Comparison of Impacts with Park to Playa Trail IS/MND

Segment C would have the same impacts on geology and soils as the Park to Playa Trail, and the same regulatory requirements (RR 4.6-1 and RR 4.6-2) would be implemented by Segment C, as listed above. Impacts would be less than significant.

4.7 GREENHOUSE GAS EMISSIONS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

4.7.1 Environmental Setting

Climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, which is an average increase in the temperature of the atmosphere near the Earth's surface, and is attributed to an accumulation of greenhouse gas (GHG) emissions in the atmosphere. GHGs trap heat in the atmosphere which, in turn, increases the Earth's surface temperature. Some GHGs occur naturally and are emitted into the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through fossil fuel combustion in conjunction with other human activities appears to be closely associated with global warming (OPR 2008).

Table 4-10 shows the magnitude of GHG emissions on the global, national, State, and regional scales.[9]

TABLE 4-10
COMPARISON OF WORLDWIDE GHG EMISSIONS

Area and Data Year	Annual GHG Emissions ($MMTCO_2e$)
World (2012)	46,049
United States (2013)	6,673
California (2013)	459
Los Angeles County (2011)	66
$MMTCO_2e$: million metric tons of carbon dioxide equivalent; GHG: greenhouse gas Source: WRI 2014; USEPA 2015b; CARB 2015; SCAG 2011.	

GHGs, as defined under California's AB 32, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). General discussions on climate change often include water vapor, atmospheric ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed

[9] GHG emissions for project-level analyses are commonly expressed in metric tons of carbon dioxide equivalent ($MTCO_2e$). Larger quantities of emissions, such as on the State or world scale, as shown in Table 4-9, are expressed in million metric tons of carbon dioxide equivalent ($MMTCO_2e$). (Metric tons may also be stated as "tonnes").

directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by regulatory bodies (such as CARB) or climate change groups (such as the California Climate Action Registry) as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided below.

GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, since CH_4 and N_2O are approximately 21 and 310 times more powerful than CO_2, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 21 and 310, respectively (CO_2 has a GWP of 1). Carbon dioxide equivalent (CO_2e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO_2e. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4-11.

TABLE 4-11
GLOBAL WARMING POTENTIALS AND ATMOSPHERIC LIFETIMES

Greenhouse Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50–200	1
Methane (CH_4)	12±3	21
Nitrous Oxide (N_2O)	120	310
HFC-134a	14.6	1,300
PFC: Tetrafluoromethane (CF_4)	50,000	6,500
PFC: Hexafluoroethane (C_2F_6)	10,000	9,200
Sulfur Hexafluoride (SF_6)	3,200	23,900
Source: USEPA 2012b.		

AB 32, the California Global Warming Solutions Act of 2006, recognizes that California is the source of substantial amounts of GHG emissions. The statute states that:

> Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the State from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

In order to avert these consequences, AB 32 establishes a State goal of reducing GHG emissions to 1990 levels by the year 2020, which is a reduction of approximately 16 percent from forecasted emission levels, with further reductions to follow (CARB 2011). In an effort to help achieve this reduction, Executive Order S-14-08 raises California's renewable energy goal to 33 percent by 2020. In addition, Executive Order B-30-15 sets an "interim" statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030, and directs State agencies with jurisdiction over GHG emissions to implement measures pursuant to their statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels.

4.7.2 Impact Analysis

a) Less than Significant Impact

The Cities of Los Angeles and Culver City and the County of Los Angeles have not adopted or established quantitative GHG emissions significance criteria. In April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. On December 5, 2008, the SCAQMD Governing Board adopted an interim CEQA GHG significance threshold of 10,000 metric tons of CO_2 equivalent per year ($MTCO_2e/yr$) for projects where the SCAQMD is the lead agency (SCAQMD 2008). In September 2010, the Working Group presented a revised tiered approach to determining GHG significance for residential and commercial projects, which is discussed below (SCAQMD 2010). The Working Group has not convened since the fall of 2010. As of August 2015, the proposal has not been considered or approved for use by the SCAQMD Board.

At Tier 1 of the proposed approach, GHG emissions impacts would be considered less than significant if a project qualifies under a categorical or statutory exemption under CEQA. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impacts would be less than significant if a project is consistent with a previously adopted GHG reduction plan that meets specific requirements.[10] At Tier 3, the Working Group proposes to extend the 10,000 $MTCO_2e/yr$ screening threshold that is currently applicable to industrial projects where the SCAQMD is the lead agency to industrial projects under other lead agencies. For residential and commercial projects, the Working Group proposes the following Tier 3 screening values: either (1) a single 3,000 $MTCO_2e/yr$ threshold for all land use types or (2) separate thresholds of 3,500 $MTCO_2e/yr$ for residential projects, 1,400 $MTCO_2e/yr$ for commercial projects, and 3,000 $MTCO_2e/yr$ for mixed-use projects. There have been no proposed thresholds for recreation or infrastructure projects.

Construction GHG emissions from Segment C were calculated by using CalEEMod Version 2013.2.2, as discussed in Section 4.3, Air Quality, above. Construction GHG emissions would be generated by vehicle engine exhaust from construction equipment, on-road hauling trucks, vendor trips, and worker commute trips. The total estimated construction GHG emissions for the project is 161 $MTCO_2e$. For estimating long-term annual GHG emissions, the SCAQMD has recommended amortizing construction emissions over the life of a project, and a common value for project life is 30 years (SCAQMD 2008). Therefore, the 30-year amortized construction emissions would be 5 $MTCO_2e/year$.

In the long-term, there would be no measureable increase in vehicle trips that would be associated with future trail use alone and only a relatively minor increase in trips for maintenance activities to Segment C by KHSRA on-site personnel. As such, minimal Project-related mobile-source GHG emissions, no stationary-source GHG emissions, and no area-source GHG emissions would occur. Also, while some trees (that provide carbon sequestration) would be removed, revegetation

[10] The GHG reduction plan must (a) quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities in a defined geographic area; (b) establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable; (c) identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area; (d) specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (e) establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and (f) be adopted in a public process following environmental review (Section 15183.5 of the CEQA Guidelines).

over a larger area would be provided as part of the project. Therefore, there would be minimal anticipated project-related operational GHG emissions.

The estimated increase in annual GHG emissions, including amortized construction emissions, would be nominally 5 $MTCO_2e$/yr. This value is less than the proposed SCAQMD Tier 3 screening threshold of 3,000 $MTCO_2e$/yr for all land use types.

It is accepted as very unlikely that any individual development project would have GHG emissions of a magnitude to directly impact global climate change; therefore, any impact would have to be considered on a cumulative basis. Because the project's GHG emissions would be less than proposed SCAQMD Tier 3 screening threshold, these emissions would not be cumulatively considerable. Project impacts would be less than significant and no mitigation is required.

b) No Impact

As discussed above, the principal State plan and policy adopted for the purpose of reducing GHG emissions is AB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. Similar and intermediate goals are expressed in Executive Orders S-3-05 and B-30-15. The project's construction and operational GHG emissions would be very small when compared to SCAQMD screening thresholds. Therefore, the project does not conflict with these plans and regulations.

Senate Bill (SB) 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or alternative planning strategy (APS) that will address land use allocation in that MPOs Regional Transportation Plan (RTP). The principles of SB 375 are incorporated in SCAG's 2012 RTP/SCS. Segment C is neither a housing development project nor a transportation project. Therefore, the project would not conflict with the goals of SB 375 or the SCAG RTP/SCS.

Implementation of the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. There would be no impact.

4.7.3 Mitigation Measures

Project implementation would not result in significant impacts related to GHG emissions; therefore, no mitigation is required.

4.7.4 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impacts related to GHG would occur with implementation of Segment C. This is similar to the impacts of the Park to Playa Trail, as discussed in the previous IS/MND.

4.8 HAZARDS/HAZARDOUS MATERIALS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

A Phase I Environmental Site Assessment (ESA) and a Limited Soil Sampling Report were completed by Geocon in September 2015 and October 2015, respectively. The findings of these reports are summarized below and the reports are provided in Appendix D.

4.8.1 Environmental Setting

Regulatory Databases

The California Department of Toxic Substance Control (DTSC) maintains the Envirostor Database, which compiles hazardous material sites and generators that have been identified for clean up or that are permitted to handle hazardous materials by various regulatory agencies. Review of the Envirostor database shows that the Eastern Ridgeline Trail at the KHSRA is listed as formerly part of active oil drilling operations and future use as a park required no further actions,

but excavated soils must be analyzed for proper treatment/disposal (DTSC 2015a). Others sites in the Envirostor Database include the Westway Development Property, which is an active oil field southwest of the site for Segment C, and the Willows II Community School, where remediation work was done and a soil vapor extraction system was installed (north of the site for Segment C) (DTSC 2015b and DTSC 2015c).

The U.S. Environmental Protection Agency (USEPA) maintains the Envirofacts Database, which compiles lists of facilities subject to permitting for their potential environmental hazards to air, water, waste, land, toxics, radiation, facility, regulatory compliance, and other issues. Review of the Envirofacts Database shows that hazardous material users near the site for Segment C include industrial developments and gas stations on Jefferson Boulevard, Rodeo Road and Bowcroft Street; and a dry cleaner at Rodeo Road/La Cienega Boulevard (USEPA 2015).

The State Water Resources Control Board (SWRCB) maintains a listing of facilities that may impact groundwater (i.e., underground storage tanks and land disposal sites) through its GeoTracker. The GeoTracker identifies ongoing clean up activities on a site on Jefferson Boulevard and past industrial uses along Jefferson Boulevard and La Cienega Boulevard that have closed cases (SWRCB 2015).

Environmental Data Resources (EDR) conducted a record search of federal, state, and local databases for the site and surrounding area as part of the Phase I ESA for Segment C. The EDR search did not identify the project site in any of the databases. There are four facilities within 1/8 mile of the site that are listed in the EDR report. The available information on these facilities do not suggest that they are likely to have negatively impacted the environmental condition of the site due to the status of the facilities, type of listings, distance from the site, and/or direction with respect to the direction of groundwater flow. In addition, no releases of either volatile non-petroleum hydrocarbon chemicals of concern or volatile petroleum hydrocarbon chemicals of concern have been reported in the vicinity (Geocon 2015a).

Oil Drilling Operations

The site is located on the Inglewood oil field that has been subject to oil drilling operations since 1924. The presence of numerous oil wells in the Baldwin Hills and Blair Hills poses the potential for oil and gas seeps, although no gas seeps have be recorded in the project area (USGS 2011).

The California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) online mapping system shows numerous oil or gas wells on the site and within one-mile of the site, mainly to the south. Eight plugged oil and gas production wells are located near the proposed trail alignment for Segment C, with several other wells within the BHRCA parcel.

During the site survey for the Phase I ESA, an aboveground water pipeline was observed along the northern side of the site through the oil field. At the point where the proposed trail would extend up the hill, a Chevron petroleum pipeline traverses the dirt road (as evidenced by a warning sign). No aboveground or underground storage tanks or containers, or evidence of other underground utilities or structures were observed. No pits, ponds, lagoons, or pools of liquid were found on-site. In addition, no surface staining, odors, or stressed vegetation were observed and no evidence of hazardous materials, hazardous waste, petroleum products, or dumping was observed.

Since historic oil and gas exploration, production, processing and associated activities occurred at the site and storm water runoff from the Inglewood oilfield goes into the Dabney Lloyd Basin and passes through an open drainage channel at the eastern end of the site for Segment C (where it enters a storm drain inlet at the northeastern corner of this area), a Limited Soil Sampling Report

was conducted to determine if past and ongoing activities have resulted in the release of petroleum hydrocarbons from crude oil onto the ground surface where the proposed trail would be located.

The Limited Soil Sampling involved soil sampling and testing at 10 locations along the trail alignment. Soils were collected at depths of 1, 2 and 5 feet below the surface and tested for petroleum hydrocarbons (gas, oil and diesel range), semi-volatile organic compounds, organochlorine pesticides, volatile organic compounds, and metals. The results of the initial soil testing indicated that elevated levels of lead and arsenic were present at two sampling locations (B-2 and B-8). Additional soil testing was conducted to determine the extent of the arsenic and one sample was further analyzed for soluble arsenic. The soil testing results are provided in Appendix D.

Culver City Park and a portion of the Baldwin Hills Scenic Overlook are located on top of a closed landfill (Hetzler Dump), and this area may be producing methane gas. The City of Los Angeles designates the portion of the KHSRA within City limits and areas northwest and east of the KHSRA as Methane Zones, where structures must include methane-control systems (City of Los Angeles 2004).

The Baldwin Hills are not located in an area with naturally occurring asbestos, which is a known human carcinogen (CDMG 2000).

Airports

The nearest airport to the site for Segment C is the Santa Monica Municipal Airport. This airport is located at 3223 Donald Douglas Loop, approximately 3.6 miles west of the site. This airport has 2 runways and 1 helipad, and serves as the base for 269 single-engine, multi-engine, jet airplanes and helicopters. It had 452 operations per day in 2012 (AirNav 2015). The Airport Influence Area for this airport does not include the proposed trail alignment (ALUC 2003b).

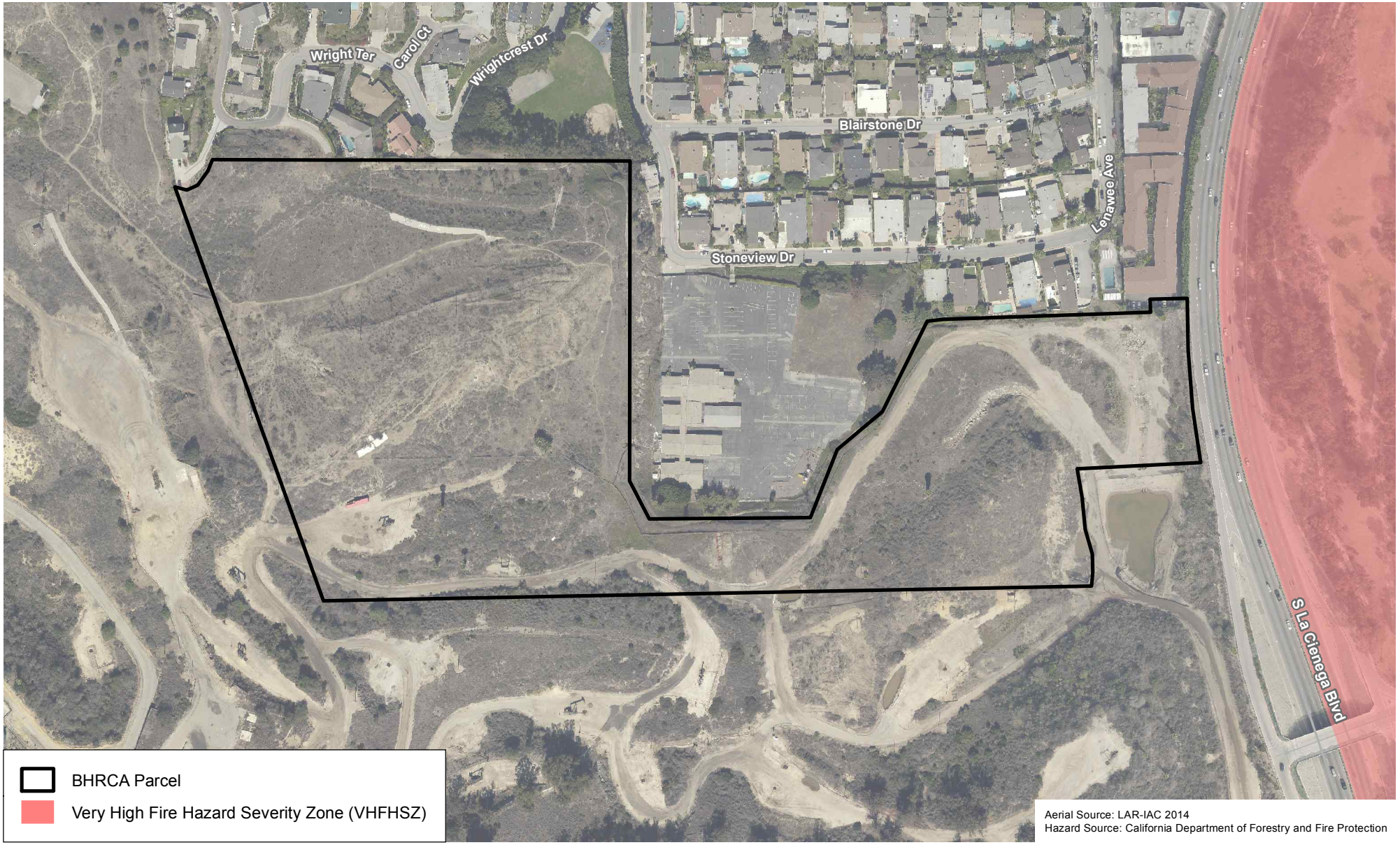
Pipelines and Transmission Lines

There are several hazardous liquid or high-pressure gas transmission lines in or near the site. These include a gasoline pipeline owned by Chevron Pipeline Company, which runs north-south through the site, past the Stoneview Nature Center site, and through the Blair Hills community. Several other crude oil, natural gas and gasoline pipelines are present in the Inglewood oilfield, south of the site (PHMSA 2012).

High-voltage power lines on concrete poles run along the east side of La Cienega Boulevard through the Baldwin Hills. In addition, several power and utility lines on wooden poles run along the west side of La Cienega Boulevard.

Wildfire Hazards

The Baldwin Hills area has been designated as a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Prevention, except for the areas in Culver City, which includes the site for Segment C (CAL FIRE 2011a). Exhibit 4-8 shows identified wildfire hazard areas, which is located across La Cienega Boulevard, east of the BHRCA parcel.



Aerial Source: LAR-IAC 2014
Hazard Source: California Department of Forestry and Fire Protection

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Wildfire Hazards

Exhibit 4-8

Segment C of the Park to Playa Trail

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250 125 0 250
Feet

BonTerra PSOMAS

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4.8.2 Impact Analysis

a) Less Than Significant Impact

No long-term hazardous materials transport, use, or disposal is expected with the proposed Segment C trail, and hazardous materials storage would not occur with the project. The construction of the proposed trail improvements and intermittent trail maintenance by the County maintenance staff at KHSRA would require limited use of hazardous materials. The project would not create a significant hazard to the environment. In addition, the pedestrian bridge, ramp and elevated boardwalk would have safety railings. The trail would also be fenced off from adjacent oilfield activities. Therefore, impacts would be less than significant.

b) Less Than Significant Impact with Mitigation

Construction activities would involve the use of hazardous materials, such as paints, thinners, solvents, acids, curing compounds, grease, oils, and other chemicals, which could pose risks to construction workers or lead to soil and groundwater contamination if not properly stored, used, or disposed. To prevent environmental hazards, the handling of hazardous materials would have to be made in accordance with existing regulations (RR 4.8-1). These regulations include the proper transport of hazardous materials; on-site storage and use; and procedures to implement in the event of a spill. In addition, under RR 4.9-1, the project would be implementing an SWPPP that would include BMPs for hazardous material and waste management, as discussed in Section 4.9, Hydrology and Water Quality.

The trail alignment crosses underground pipelines that are located in the Baldwin Hills. Grading and excavation may disturb oil and gas pipelines and lead to leaks, fire, explosions, and related hazards. Compliance with RR 4.8-2 regarding notification of and coordination with the pipelines' owners/operators (through the DigAlert program) and their approval and monitoring of activities near the pipelines would avoid damage to these lines and would prevent the creation of hazards to the surrounding area. Impacts would be less than significant with compliance with RR 4.8-2.

The Federal and State Occupational Safety and Health Acts include regulations pertaining to worker safety, including standards for safe workplaces and work practices. Oilfield activities pose specific hazards to workers due to the types of equipment and the presence of hazardous materials that are present at the Inglewood Oilfield. The Oilfield Operator (FMO&G) has established worker safety programs and practices in compliance with pertinent regulations. These include the use of personal protection equipment by all persons at the oilfield. The construction crew will have to wear Flame Resistant Clothing ("FRC") with a Hazard/Risk Category ("HRC") rating of 1, steel toe boots, hard hats, and safety glasses during construction activities at the BHRCA parcel (MM 4.8-1) to protect the crew from oilfield hazards, as may be required by FMO&G.

The proposed Segment C trail would not be located near power transmission and utility lines, but the pedestrian bridge would cross the alignment of high voltage power lines on the east side of La Cienega Boulevard, as well as other power and utility lines on the west side of La Cienega Boulevard. The project includes the undergrounding of nearby overhead power and utility lines on both sides of La Cienega Boulevard, in coordination with LADWP, SCE, and other utility owners. This will separate the bridge from the utility lines; protect the power and utility lines from disturbance; and prevent the creation of public safety hazards to the users of the pedestrian bridge.

Maintenance activities for the proposed trail is likely to utilize hazardous materials, such as paints, thinners, cleaning solvents, fertilizers, pesticides, and automotive substances in maintenance

equipment, but in limited quantities. Any hazardous materials used for maintenance would be brought to the trail by the maintenance crew but would not be stored along the trail. Rather, hazardous materials would be stored at maintenance yard at the KHSRA, as existing. Compliance with RR 4.8-1 on the use, storage, and disposal of hazardous materials in accordance with existing regulations would prevent the creation of significant impacts. With project compliance, no significant hazard to the environment would be created.

No oil or gas seeps have been identified in the Inglewood oilfield. However, there is a possibility for hydrocarbon seeps due to the presence of abandoned wells, some of which may not have been sealed in accordance with current regulations. Thus, if grading and excavation activities uncover the presence of old abandoned wells, compliance with California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) regulations for proper well abandonment would have to be followed (RR 4.8-3). These regulations have been adopted to prevent the potential for contamination of adjacent soils, the underlying groundwater, or other natural resources; to prevent damage to geothermal resources; and to protect life, health, environment, and property.

The California Human Health Screening Levels (CHHSLs) are concentrations of 44 hazardous chemicals that Cal/EPA considers to be below thresholds of concern for risks to human health. The thresholds of concern used to develop the CHHSLs are an excess lifetime cancer risk of one in a million and a hazard quotient or 1.0 for non-cancer effects. Under most circumstances, the presence of a chemical at concentrations below its respective CHHSL can be assumed to not pose a significant risk. The presence of a chemical at concentrations above a CHHSL does not indicate that adverse impacts to human health are occurring or will occur, but suggests that further evaluation is warranted.

The findings of the Limited Soil Sampling indicate that the concentrations of metals, other than lead and arsenic, reported for the soil samples were below their respective CHHSLs for residential and/or industrial land use. Arsenic is a naturally occurring element and natural background concentrations of arsenic in California are often much greater than the health-based direct-exposure goals in soil and Cal-EPA generally does not require cleanup of soil to below background levels. When the reported concentrations were compared to regional background concentrations, the arsenic concentrations reported for the soil samples are considered to be consistent with background concentrations of arsenic in Los Angeles County. However, the arsenic concentrations reported in samples collected in the vicinity of boring B-2 (at the eastern section of the BHRCA parcel) exceed background concentrations. Thus, a Health and Safety Plan would have to be prepared and developed by the contractor to protect construction workers from exposure to arsenic and petroleum hydrocarbon containing-soils at the site. This plan shall include protocols for environmental and personnel monitoring, requirements for personal protective equipment, other appropriate health and safety protocols, and procedures for the handling and disposal of arsenic and petroleum hydrocarbon containing-soils.

In addition, should stained, discolored and/or odorous soils be encountered during ground disturbance activities, soil testing for contamination will have to be conducted and if contamination is present, the contaminated soils would have to be remediated to below established maximum contaminant levels (MCLs) or disposed off-site in accordance with existing regulations.

The implementation of the Health and Safety Plan (MM 4.8-2) and any necessary soil sampling and remediation (MM 4.8-3) would prevent adverse impacts to the construction crew. Impacts would be less than significant after mitigation.

The reported concentrations of lead reported for soil samples at 2 and 5 feet below the ground surface (bgs) at boring B-8 (western section of the site) exceed the residential land use but are

lower than the industrial land use CHSSL. Since the proposed trail improvements at this location would be limited to a compacted earthen trail, no further evaluation with respect to lead content in the soil is necessary and no risks to human health would be created by the proposed trail.

In the long-term, the risk to trail users and maintenance workers that may occur is expected to be below risk thresholds. This is due to the recreational type of land use proposed (i.e., hiking trail); the presence of users on Segment C for only short periods of time (from a few minutes to one to two hours each time) on any given day during their lifetime; the limited soil disturbance that would be required during maintenance of the trail improvements; and the lack of human contact with contaminated soils during trail use.

The County of Los Angeles has adopted building standards (Sections 110.3 and 110.4 of the County Building Code) for controlling methane gas hazards within 1,000 feet of a landfill and 25 feet of an abandoned or idle oil or gas well, while the City of Los Angeles has methane seepage regulations. Since no enclosed structures that could lead to high concentrations of methane are proposed with the project, no hazards associated with methane exposure at high concentrations or potential combustion would occur. The proposed trail would not produce methane or affect existing methane migration and concentrations in the project area.

Impacts would be less than significant with compliance with existing hazardous material regulations and implementation of MMs 4.8-1, 4.8-2 and 4.8-3.

c) Less than Significant Impact

There are no schools within 0.25 mile of the site for Segment C. The nearest school is The Willows Community School, located on 8509 Higuera Street in Culver City (located approximately 0.5 mile north of the site). This school is a private school open to students in grades kindergarten through 8 (The Willows Community School 2015). The West Los Angeles College, located on 9000 Overland Avenue, is a community college located 0.6 mile southwest of the site for Segment C.

The proposed trail improvements would not pose a significant hazard to the students and faculty of The Willows Community School or the West Los Angeles College due to the lack of routine hazardous materials use associated with the long-term trail use and minor and intermittent maintenance activities for the trail. During construction, hazardous materials use, storage, and disposal would be made in accordance with existing regulations (RR 4.8-1). This would preclude the creation of hazards to nearby schools and other sensitive land uses. Impacts would be less than significant.

d) Less Than Significant Impact with Mitigation

The BHRCA parcel is not listed in government databases as a hazardous materials user/generator subject to clean up activities. Trail improvements proposed on Segment C would include a hiking trail, steps, a pedestrian bridge, signs, an interpretive node, elevated boardwalk, fencing, and revegetation at the eastern end of this trail. Measures to avoid health hazards associated with exposure to the arsenic and petroleum hydrocarbon containing-soils (as provided in MM 4.8-2) would have to be implemented by the project.

While the reported concentrations of total petroleum hydrocarbons (TPH) are generally below the concentrations that would require cleanup by a regulatory agency, they may present a soil management issue if the material is to be exported offsite for disposal. Currently, regulatory criteria for the classification of wastes based solely on the concentrations of TPH, such as gasoline, diesel, and oil have not yet been promulgated. Thus, the disposal of TPH-impacted soil

is generally regulated by disposal facility permit and acceptance criteria. The contractor's Health and Safety Plan shall include soil management practices, including compliance with the disposal requirements imposed by the disposal facility.

No discolored, stained and odorous soils were observed on the site during the site survey for the Phase 1 ESA and limited soil sampling. However, if discolored, stained and odorous soils are encountered during construction activities, sampling and remediation of contaminated soils (as provided in MM 4.8-3) would have to be implemented. The remediation and disposal activities will include have to be made with oversight from regulatory agencies and to reduce contaminant concentrations to below established maximum contaminant levels (MCLs). Impacts would be less than significant after mitigation.

While there are several industrial and commercial sites in the project area that are listed in government databases as hazardous material users and hazardous waste generators, these uses do not pose hazards to the site (Geocon 2015a). Also, the proposed trail would not be located on or adjacent to these hazardous material users/generators. A security fence would separate the trail from oilfield operations to the south. Therefore, the project would not expose trail users to hazards associated with these adjacent land uses.

e, f) No Impact

As discussed above, the nearest airport to the site is the Santa Monica Municipal Airport. The proposed trail would not be located within the airport influence area of the Santa Monica Municipal Airport. Therefore, the project would not be exposed to aircraft hazards and would not adversely affect aircraft or airport operations, and there would be no impact.

g) Less than Significant Impact

The project would involve construction on and near a public roadway that is used for emergency response and evacuation - La Cienega Boulevard. However, the proposed pedestrian bridge over La Cienega Boulevard would not block traffic flows on La Cienega Boulevard as no column or other improvement is proposed within the roadway's travel lanes. Only utility line undergrounding and the relocation of streetlights, roadway signs, and transformers would occur at the edge of the right-of-way.

As discussed in Section 4.16, Traffic and Transportation, the proposed pedestrian bridge is required to have a minimum vertical clearance of 17 feet over La Cienega Boulevard, as required by the Federal Highway Administration for pedestrian overpasses (RR 4.16-3). The bridge would be 18.5 feet above the roadway grade. Thus, it would not pose hazards to large vehicles passing under the bridge.

During the construction phase, La Cienega Boulevard could be partially blocked by construction activities, equipment, and crews but this road would remain open and available to serve as evacuation routes for the construction crew and others present in the area. Access to adjacent developments would also be maintained at all times. In accordance with Los Angeles County, Culver City, and Los Angeles City requirements, the project would implement temporary traffic control measures in accordance with the Greenbook, Graybook, and Manual for Uniform Traffic Control Devices (MUTCD) (RR 4.16-1 and RR 4.16-2), where necessary. This would involve the provision of traffic control devices to ensure the safe flow of traffic during construction activities on or near public rights-of-way, as discussed in Section 4.16, Traffic and Transportation. Impacts on emergency response and evacuation would be less than significant.

h) Less than Significant Impact

The approximate 0.8-acre, 20-foot-deep Dabney Lloyd catch basin/retention basin (located within the oil and gas exploration, production, processing and associated activities west of La Cienega Boulevard and south of the site) is fenced, and a barrier fence is proposed along both sides of the proposed trail to prevent unauthorized users in the oilfield and near the Lloyd Basin. Therefore, hazards associated with this basin would be avoided.

Wildfire hazards are present in the Baldwin Hills area due to the presence of large open areas with scrub vegetation, steep slopes, and limited access. The BHRCA parcel is outside the area identified to have wildfire hazards but the KHSRA is within the area designated as a Fire Hazard Severity Zone. Also, the proposed trail would pass through an undeveloped area, which has the potential for brush fires.

Chapter 32 of the Los Angeles County Code regulates activities in hazardous fire areas by requiring permits for recreational activities and other temporary or permanent activities in these areas. The approved permit would include specific restrictions, precautions, and safeguards to prevent fire in these areas, such as the provision of the necessary fire protection equipment and water supply, fire breaks, warning signs, brush removal, fire guards, adequate access, fencing, and other similar conditions and limitations. Spark arresters are also required for equipment and machinery used in fire hazard areas. Compliance with this regulation (as RR 4.8-4 below) would reduce wildfire hazards along the trail during construction and use. While this County regulation is applicable only to County lands, the County manages the KHSRA and will be responsible for managing Segment C. Therefore, RR 4.8-4 shall be implemented by the project.

Division 25 of Article 7 of Chapter 5 of the Los Angeles City Municipal Code requires the posting of no open burning or smoking signs in Very High Fire Hazard Severity Zones. The City also prohibits flaming or glowing objects, open flames, and smoking in these areas. Compliance with this regulation (as RR 4.8-5 below) would reduce wildfire hazards near the pedestrian bridge during construction and use. While this regulation applies to land in the City of Los Angeles, the posting of this regulation could reduce the incidence of wildfire along the entire trail. Therefore, RR 4.8-5 shall be implemented by the project.

Smoking and fireworks are prohibited in city parks and recreational areas by Sections 9.02.205, 9.10.055. 9.11.115, 9.11.120 and 9.11.130 of the Culver City Municipal Code. Compliance with these regulations by trail users would also prevent accidental fires in Segment C.

The proposed trail would not be highly susceptible to fire due to the type of improvements (i.e., natural surface trail and the predominant use of concrete, aggregates, and metals for trail amenities such as signs, benches, concrete steps, retaining walls, trash receptacles, railings, and fences). Wildfire hazards to the trail improvements would not be significant.

In compliance with RR 4.8-4 and RR 4.8-5, warning signs (e.g., no smoking signs) would be provided along the trail to educate the public on preventing brush fires. Also, the project would provide fencing in select areas to prevent public access to adjacent oil and gas exploration, production, processing and associated activities. Maintenance equipment is also required to have spark arresters to prevent brush fires. Compliance with these restrictions, precautions, and safeguards would reduce wildfire hazards along the proposed trail. Impacts from the project would be less than significant.

4.8.3 Regulatory Requirements

RR 4.8-1 Construction and maintenance activities for the project shall comply with existing regulations regarding hazardous material use, storage, disposal, and transport so that no major threats to public health and safety are created. These regulations include the Toxic Substance Control Act, Hazardous Material Transportation Act, Resource Conservation and Recovery Act, California Hazardous Waste Control Act, Certified Unified Program Agency, and California Accidental Release Prevention Program.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with pertinent hazardous material regulations during construction and maintenance activities on Segment C.

RR 4.8-2 In accordance with Title 8, Section 1541, of the California Code of Regulations (CCR), persons planning new construction and/or excavations or new utility lines near or crossing existing subsurface installations and lines, high-pressure pipelines, natural gas/petroleum pipelines, electrical lines greater than 60,000 volts, and other high-priority lines, are required to notify the Owner/Operator of the line and to determine the locations of subsurface lines prior to any ground disturbance for excavation. Coordination, approval and monitoring by the Owner/Operator of the line would avoid damage to high-priority lines and the creation of hazards to the surrounding area.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with these regulations during construction activities near or across underground utility lines.

RR 4.8-3 In the event that abandoned oil wells are uncovered during construction, the contractor shall consult with the California Department of Oil, Gas and Geothermal Resources (DOGGR) to ensure that these wells were properly abandoned; otherwise, these wells shall be plugged and abandoned in accordance with Chapter 4 of Title 14, Division 2 of the California Code of Regulations. The requirements include filing a notice with the DOGGR; proper use of cement plugs; building/structure setbacks; and provision of vent combs.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with pertinent DOGGR regulations during construction activities on or near abandoned wells.

RR 4.8-4 As stated in Chapter 326 in Title 32 of the Los Angeles County Code, the contractor shall obtain a permit from the County for all construction and maintenance activities in hazardous fire areas. The contractor shall then comply with the provisions of the permit, including the availability of fire protection equipment; an adequate water supply; creation of fire breaks; installation of warning signs; brush removal; adequate emergency access; fencing; and the use of equipment and machinery with spark arresters.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with this regulation during construction and maintenance activities on Segment C.

RR 4.8-5 As stated in Division 25 of Article 7 of Chapter 5 of the Los Angeles City Municipal Code, signs shall be posted along Segment C, which outline prohibitions on open burning, smoking, flaming or glowing objects, and open flames.

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications. The contractor shall include the required signs in the project plans; shall install the required signs; and shall comply with these regulations during construction and maintenance activities on Segment C.

From Section 4.9, Hydrology and Water Quality

RR 4.9-1 Project construction shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002, or the latest approved general permit). This General Permit requires construction activities (including demolition, clearing, grading, excavation, and other land-disturbing activities) that result in the disturbance of one acre or more of total land area to file and submit a Notice of Intent (NOI); Risk Assessment; Site Map; Storm Water Pollution Prevention Plan (SWPPP); annual fee; and a signed certification statement to the State Water Resources Control Board prior to construction. In order to obtain coverage under the Construction General Permit, a project-specific SWPPP shall be prepared, which shall contain Best Management Practices (BMPs) that would be implemented to reduce or eliminate construction-related pollutants in the runoff.

As part of the SWPPP preparation and implementation, the design-build contractor shall also comply with the County of Los Angeles' Construction Site Best Management Practices Manual that contains the County's requirements for BMPs to include in the SWPPP and the implementation of BMPs during construction.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with these State and County regulations, including the filing of the NOI and preparation of the SWPPP prior to construction activities and the implementation of BMPs and other items in the SWPPP during construction activities for the proposed project.

From Section 4.16, Transportation/Traffic

RR 4.16-1 In accordance with the Cities of Los Angeles and Culver City and the County of Los Angeles' general construction requirements, temporary traffic control measures shall be implemented in accordance with the Standard Specifications for Public Works Construction (Greenbook) and the County's Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), which contain standards for maintenance of access, traffic control, and notification of emergency personnel.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). During construction activities, the contractor shall provide temporary traffic control measures in accordance with the Greenbook and Graybook.

RR 4.16-2 Trail improvements on public rights-of-way shall include the provision of traffic control devices in compliance with the Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on streets and highways. The MUTCD includes signs, markings, and traffic control devices needed to promote pedestrian and vehicle safety and traffic efficiency.

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall design and construct all improvements on public roadways in accordance with the MUTCD.

4.8.4 Mitigation Measures

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

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this mitigation during construction activities on Segment C.

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

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this mitigation during construction activities on Segment C.

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

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this mitigation during construction activities.

4.8.5 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impact related to hazards and hazardous materials would occur with compliance with existing regulations and implementation of MMs 4.8-1, 4.8-2 and 4.8-3.

The impacts of Segment C on hazards and hazardous materials would be the same as the impacts of the Park to Playa Trail (as discussed in the previous IS/MND) although more defined mitigation measures have been developed based on the findings of the soil testing at the site. Implementation of MMs 4.8-1, 4.8-2 and 4.8-3 would reduce the impacts of Segment C to less than significant levels.

4.9 HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollutant runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

4.9.1 Environmental Setting

Ballona Creek Watershed

The Baldwin Hills and Blair Hills areas are located in the Ballona Creek Watershed, which is an approximate 130-square-mile watershed in the western section of Los Angeles County, with the Santa Monica Mountains to the north and the Baldwin Hills to the south. It includes the Cities of Culver City, West Hollywood, Beverly Hills; portions of the Cities of Los Angeles, Santa Monica and Inglewood; and portions of the Hollywood Hills and Santa Monica Mountains. The hills and the basin area drain into Ballona Creek (located west of the hills) and Centinela Creek, which

joins the Ballona Creek southwest of the Baldwin Hills. The Ballona Creek is an underground pipe and open concrete-lined trapezoidal channel, generally flowing in a southwesterly direction to the Ballona Wetlands and Estuary and empties into the Pacific Ocean at Santa Monica Bay (LACDPW 2004). The site for Segment C is located east of the Ballona Creek, approximately 5.5 miles from the Pacific Ocean.

The KHSRA has a fishing lake and a lotus pond, which are manmade and filled with irrigation water runoff and municipal water. The adjacent oil and gas exploration, production, processing and associated activities also have small, scattered retention basins or collection basins supporting oil and gas exploration, production, processing and associated activities. One of these, the Dabney Lloyd Basin, is located immediately south of the site and west of La Cienega Boulevard. A drainage channel extends from this basin through the site and into an underground storm drain line at the northeastern edge of the site.

The Baldwin Hills Reservoir was built in 1948 and had a capacity of 292 million gallons. In December 1963, a crack in the floor and a leak through the embankment of reservoir lead to the inundation of the canyon where Cloverdale Avenue passes (north of the reservoir). Floodwaters killed five persons and damaged hundreds of homes (CDMG 1982). This reservoir was subsequently backfilled and is now Janice's Green Valley in the KHSRA.

Drainage Patterns

There is a flood-control basin on the site that detains storm water from the Baldwin Hills Scenic Overlook for ground percolation, with overflows from the basin going into a V-ditch that runs in an easterly and then a northerly direction into Blair Hills Park. This basin reduces runoff flows into the Blair Hills residential neighborhood to the north. It is generally dry except during major storm events.

The portion of the Inglewood oilfield south of the site drains in a northeasterly direction toward the Dabney Lloyd catch basin/retention basin. From the basin, storm water flows northerly within an unlined channel across the eastern end of the site toward a storm drain pipe at the northeastern corner, which conveys runoff in a northerly direction into an underground pipe on Lenawee Avenue and eventually into the Ballona Creek.

The western section of the KHSRA drains in southwesterly and westerly directions as sheet flow through unlined drainage channels and concrete-lined drainages in the KHSRA and into catch basins and a drainage pipe crossing La Cienega Boulevard. The pipe discharges into the unlined channel on the site.

Surface Water Bodies

The *Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* outlines the standards and programs to preserve and enhance water quality and to protect beneficial uses of waters in both counties. The existing beneficial uses of Ballona Creek include non-contact water recreation and wildlife habitat. The potential beneficial uses include municipal and domestic supply, water contract recreation, and warm freshwater habitat (Los Angeles RWQCB 1995).

Ballona Creek is listed as a Section 303(d) impaired water body due to high levels of cadmium (sediment), coliform bacteria, dissolved copper, cyanide, lead, selenium, toxicity, trash, enteric viruses, and zinc. Total Maximum Daily Loads (TMDLs) have been adopted for these pollutants, except cyanide, which has a TMDL completion date of 2019. Downstream of Ballona Creek, the

Ballona Creek Estuary and the Ballona Creek Wetlands are also listed as impaired water bodies (USEPA 2011).

Flood Hazards

The Federal Emergency Management Agency (FEMA) has not identified flood hazards on the site for Segment C. However, it has identified the Dabney Lloyd catch basin/retention basin (south of the site and west of La Cienega Boulevard) as Zone A (areas within the 100-year floodplain), and the section of La Cienega Boulevard from the KHSRA entrance north to Rodeo Road and on Rodeo Road from La Cienega Boulevard west to the Ballona Creek as Zone X (areas within the 500-year floodplain). All other areas near the site are outside the 100-year and 500-year floodplains (FEMA 2008a, 2008b). Exhibit 4-9 shows flood hazards in the project area.

Groundwater

The project area is underlain by the Coastal Plain of Los Angeles Groundwater Basin, which consists of four main groundwater basins (DWR 2004). The site for Segment C is located at the eastern edge of the Santa Monica Basin, near the basin's boundaries within the Central Basin, with the Newport-Inglewood Fault Zone dividing the basins. The Santa Monica Basin is bound by the Santa Monica Mountains to the northwest, the Pacific Ocean to the west and southwest, the Newport-Inglewood fault to the northeast, and the Ballona escarpment and Baldwin Hills to the south and southeast. Earthquake faults further divide this basin into five subbasins, with the site within the Crestal subbasin. Historic water levels in the Santa Monica Basin ranged from sea level to 230 feet above msl (MWD 2007). Soil borings at the site encountered groundwater at depths of 12 and 15 feet bgs at borings west of La Cienega Boulevard and at depths of 29 and 75 feet bgs east of La Cienega Boulevard (GPI 2015).

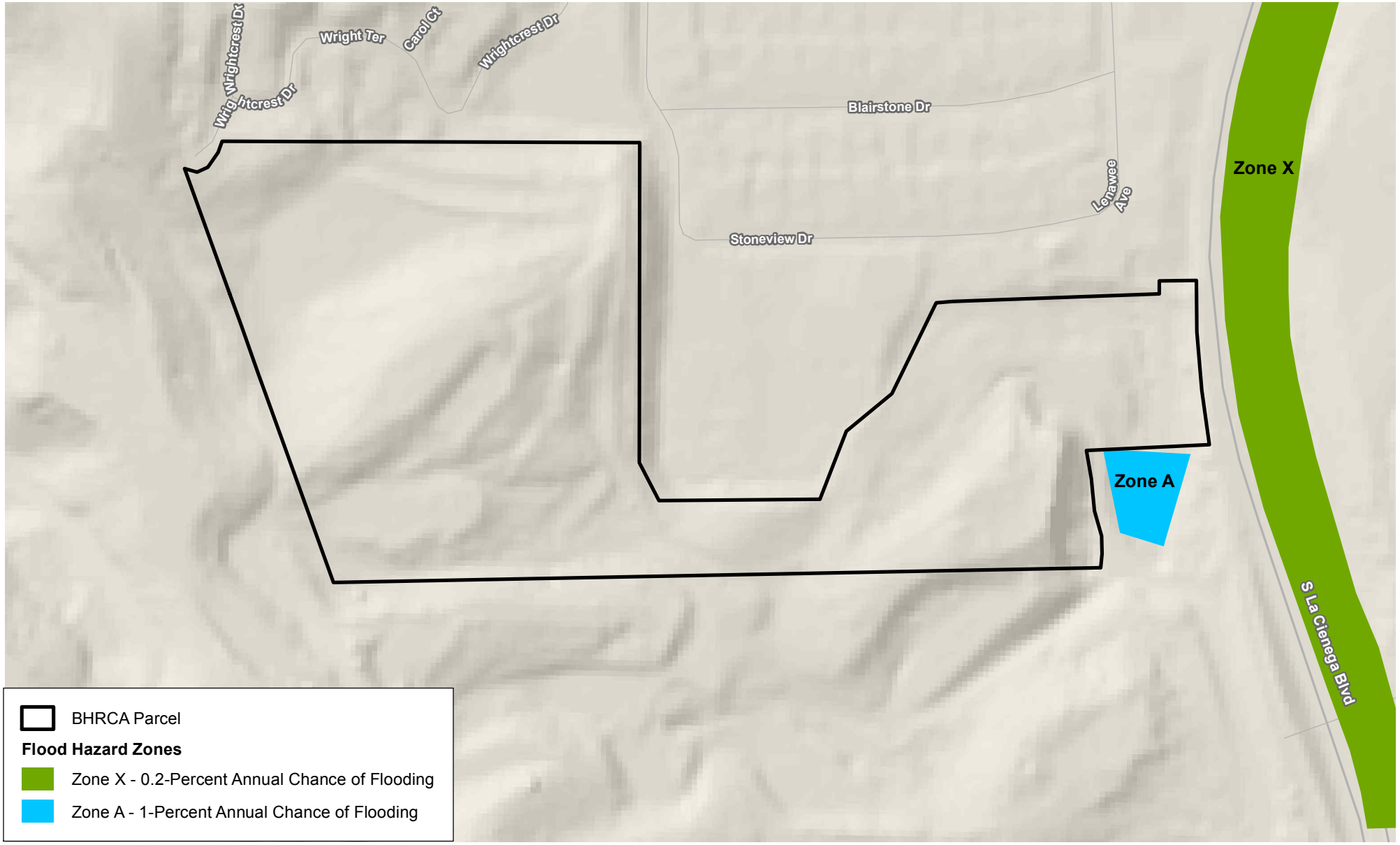
4.9.2 Impact Analysis

a, f) Less Than Significant Impact

Construction of the project would have the potential to contribute sediment, trash, debris, and pollutants into drainages near the proposed trail and ultimately, in the Ballona Creek. Grading and excavation activities would generate loose soils that may enter local drainages, catch basins, storm drain pipes, and downstream creeks. In addition, construction equipment and activities could result in potential leaks of oil and grease, vehicle fluids, paint, and other solvents into the ground, which may then be washed down into these drainages. Without the use of appropriate BMPs, this could add to temporary impairments of water quality in Ballona Creek.

Construction of the proposed trail improvements would be subject to the Statewide Construction General Permit (Order 2009-0009-DWQ), as amended. Compliance with the Construction General Permit requirements include the development of a Stormwater Pollution Prevention Plan (SWPPP) that would require implementation of erosion control and sediment control best management practices (BMPs), as well as tracking control, hazardous material and waste management and other BMPs during construction. These BMPs may include installing sand bag berms and/or silt fences; scheduling construction activities outside the rainy season; conducting equipment washing and repair off-site; storing materials away from runoff flows; and implementing a Sampling and Analysis Plan (SAP) to monitor, clean up, and report any hazardous material discharges that may contaminate storm waters.

The County of Los Angeles has a Construction Site Best Management Practices Manual that contains the County's requirements for the preparation of SWPPPs and the implementation of needed BMPs in the SWPPP. The Manual requires the SWPPP to include specific erosion control



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Flood Hazards

Exhibit 4-9

Segment C of the Park to Playa Trail

N W E S

250 125 0 250 Feet

BonTerra PSOMAS

(Rev: 08-27-2015 LEW) R:\Projects\Alta (ALT)\3ALT000302\Graphics\ISMND\Ex4-9_FEMA_Flood_20151112.pdf

and sediment control BMPs, non-storm water runoff BMPs, and minimum standards of good housekeeping. It also requires year-round implementation, BMP maintenance and inspection, and notification requirements. The County also requires separate review and approval of the erosion and sediment control plan for project that includes the BMPs in the SWPPP.

With compliance with the Construction General Permit and the County's Construction Site Best Management Practices Manual (RR 4.9-1), construction debris and other construction-related substances that could be released into area drainages, catch basins, storm drain pipes, and eventually into Ballona Creek would be reduced.

No long-term adverse change in storm water runoff quality would occur with the project. The proposed trail improvements would not generate pollutants in the runoff or include restrooms or kitchen facilities that would generate wastewater that may affect long-term storm water quality in Ballona Creek.

The proposed trail would have a compacted soil surface and the pedestrian bridge would be made of concrete, steel, aluminum, and/or wood. Use of the trail may lead to trash and debris from hikers, bicyclists, and dog walkers, but a trash receptacle would be provided along the trail to reduce trash and debris that may enter local storm drains. Landscaping along the trail and revegetation of disturbed areas would also increase ground infiltration of storm water and would reduce erosion of slopes and the potential for loose soils to join storm water runoff.

Local jurisdictions have adopted storm water regulations to comply with the NPDES permit. Chapter 12.80 of the *Los Angeles County Code* contains the County's regulations for storm water and runoff pollution control and prohibits illicit discharges; illicit connections to the storm drain system; and littering and other discharge of polluting or damaging substances. Storm water and runoff pollution mitigation measures are required for construction activities and NPDES permits and registration is required for industrial, commercial, and public facility sources. Chapter 20.94.040 of the *Los Angeles County Code* also states that it is unlawful to place any refuse, rubbish, tin cans, or other matter may impede, retard, or change the normal direction of the flow of flood, storm, and other waters or that may be carried downstream by such waters to cause damage and detriment of downstream properties. It prohibits material, either solid or liquid, to be placed in a river, stream, wash, arroyo, floodway, floodplain, flood-control channel, reservoir, debris basin, or spreading ground that will deteriorate the quality of water flowing or stored therein.

Chapter 5.05 of the Culver City Municipal Code, which is the City's Storm Water Management and Discharge Control Program, regulates storm water discharges to reduce pollution in Ballona Creek, the Santa Monica Bay, and surrounding coastal areas. The regulations prohibit activities that could affect storm water quality and includes good housekeeping provisions and standard urban storm water mitigation plan requirements for new development and major redevelopment projects.

Chapter 6, Article 4.4 of Los Angeles City Municipal Code regulates storm water pollution in the City by prohibiting discharges of liquids, solids, gases, or other pollutants that may pose a hazard to humans, animals, plant, and fish life into the storm drain system and receiving waters. It provides guidelines for commercial and industrial discharges, parking lot runoff, construction activities, and spills, and prohibits dumping and disposal into the storm drain system.

The project would need to comply with County regulations for minimizing pollutants in storm water runoff. Since the various regulations have the same intent and generally have the same requirements, RR 4.9-2 has been developed to combine the requirements that would be applicable to the Park to Playa Trail, including Segment C.

Compliance with RRs 4.9-1 and 4.9-2 would prevent potential water quality impacts from long-term use of Segment C and from short-term construction activities. Impacts would be at less than significant levels.

b) Less Than Significant Impact

The project may impact groundwater resources due to excavation activities for the pedestrian bridge foundations and the presence of groundwater at depths as low as 12 feet bgs (GPI 2015). The bridge foundations could displace underlying groundwater with concrete piles or caissons. However, the size of the piles or caissons would be small due to the relative size of the pedestrian bridge and the project does not propose any long-term withdrawal or extraction of the groundwater.

Also, the project would not interfere with groundwater recharge since the proposed trail would not go through designated recharge areas for the Santa Monica groundwater basin. While impervious surfaces associated with the structural foundations for proposed trail improvements (e.g., pedestrian bridge, signs, steps, railing, fencing, and benches) would decrease ground percolation of storm water, these would occur on small, scattered areas and nearby open areas would continue to allow storm water to percolate.

The Golden State Water Company (GSWC) serves Culver City and obtains all of its water supply from imported water sources (GSWC 2011). Water for construction activities would be needed for dust control and incidental cleaning and would be a limited amount and a temporary demand. The project proposes revegetation with native plants on approximately 12,436 square feet of land, but only trees would be provided with an irrigation system. The irrigation system would present a long-term demand for potable water but would represent a minor amount of the total imported water supplies used by GSWC to serve the project area (approximately 5,024 acre-feet in 2010) (GSWC 2011). Thus, no indirect demand for groundwater supplies would occur.

Impacts on underlying groundwater resources would be less than significant.

c, d, e) Less Than Significant Impact

The project would result in changes in local drainage patterns due to proposed grading for the construction of the new trail, pedestrian bridge, and other trail improvements (i.e., signs, fencing, steps, and revegetation).

Segment C would be a new trail proposed in the Blair Hills and would be partially located in a retention basin. However, this trail would be a natural surface trail that would not create impervious surfaces that may change runoff patterns, volumes, and rates. Storm water flow is expected to continue in a southeasterly direction from the Baldwin Hills Scenic Overlook, into the retention basin and northerly toward Blair Hills Park.

Changes in drainage patterns due to the project would be localized and relatively minor since the trail would be at-grade and would have a natural soil surface and the proposed trail improvements would be located at scattered locations. Where impervious surfaces associated with sign posts and other scattered foundations (for signs, trash can, benches, steps, and fences) would be created, runoff through these areas is expected to percolate into adjacent pervious surfaces as existing, with no significant increase in runoff volumes or rates at downstream areas. Also, the pedestrian bridge would be located over a paved roadway, with impervious surfaces limited to foundations and at-grade bridge landings. Thus, changes in drainage patterns would be localized and isolated. The overall drainage patterns would remain the same as under existing conditions (e.g., primarily ground percolation on surface soils with runoff flowing downslope to area catch

basins and drainage lines that convey storm water into Ballona Creek). Since no measurable increase in runoff volume would occur with the proposed trail improvements, no change in drainage patterns or the course of water flows in the Ballona Creek would occur. Impacts would be less than significant.

g, h) No Impact

The proposed trail improvements do not include the construction of habitable structures or housing units or other structures or improvements within a 100-year flood hazard area or the 500-year floodplain, as mapped on FEMA's Flood Insurance Rate Maps. No trail improvements are proposed in areas identified as the 100-year floodplain (Lloyd Basin) or the 500-year floodplain (La Cienega Boulevard). The pedestrian bridge over La Cienega Boulevard would be 18.5 feet above the roadway surface, with no columns proposed on the street right-of-way. Thus, it would not impede runoff flows on La Cienega Boulevard. The rest of the trail would be at-grade and would not create flood hazards. Future trail users would not be exposed to flood hazards. Thus, there would be no impact related to flooding.

i) No Impact

The Baldwin Hills and Blair Hills areas are not located in identified dam inundation areas due to their elevations, although the northwestern edge along Jefferson Boulevard is within the inundation areas of the Lower Franklin Dam and the Mulholland Dam (County of Los Angeles 1990). The site for Segment C is located approximately 6.2 and 7.5 miles from the Lower Franklin Dam and the Mulholland Dam, respectively, and is outside identified inundation areas for these dams. Thus, no safety hazards to persons and property on Segment C of the Park to Playa Trail would occur in the event of dam failure. No impact would occur.

j) Less Than Significant Impact

The Geotechnical Investigation states the probability of flooding due to a seiche is nonexistent since the site is not located near a large enclosed body of water (GPI 2015). The Gwen Moore fishing lake in the KHSRA could pose seiche hazards to the surrounding area, but would not include the area where the pedestrian bridge landing is proposed (i.e., at a higher elevation on the KHSRA). However, the lotus pond in the Japanese Garden may inundate adjacent areas in the event of a seiche. The waterfall does not hold a large amount of water and would not pose seiche hazards. The Dabney Lloyd catch basin/retention basin located west of La Cienega Boulevard contains standing water and could also pose seiche hazards to Segment C, since the basin is located south of the site. However, due to the relatively small size of these water bodies, waters are expected to flow into adjacent open areas and would percolate into the open ground without creating a major flood hazard to trail users or causing major damage to the Segment C trail.

The retention basin on the site does not contain water for long periods of time and therefore, does not pose seiche hazards. The trail proposed across this basin could be exposed to flooding and mudflow hazards, but trail users are not expected to be using this trail during periods of heavy rain. Trail users could also readily stay away from this segment of the trail when the basin contains water or is saturated. Seiche hazards would be less than significant.

The Tsunami Inundation Map for Los Angeles County shows that Segment C would not be subject to inundation in the event of a tsunami (CalEMA 2009). The Geotechnical Investigation also states the probability of flooding due to a tsunami is nonexistent (GPI 2015). Therefore, the proposed trail and users of Segment C would not be exposed to tsunami inundation hazards.

Steep slopes in the Baldwin Hills have generated mudflows during major storms in the past. Also, the proposed trail would pass along the slopes around the Stoneview Nature Center site and includes a ramp up to the Baldwin Hills Scenic Overlook. Thus, it could be subject to mudflows. The steps, pedestrian bridge, and other trail improvements would be designed and constructed in compliance with the California Building Code (RR 4.6-1) to retain structural integrity and prevent the creation of unstable slopes. Therefore, any mudflows from adjacent areas are not expected to damage the trail improvements. Site grading would also direct runoff flows away from the trail and reduce the potential for erosion and mudflows.

The users of Segment C could be exposed to mudflow hazards that may occur along the trail alignment near the Baldwin Hills Scenic Overlook and future Stoneview Nature Center. However, trail users can readily leave the trail and go to higher areas (e.g., the Baldwin Hills Scenic Overlook, the future Stoneview Nature Center, or the KHSRA through the pedestrian bridge) during major storms and can stay out of areas where debris flows and mudflows are occurring. Due to the limited slope areas near the trail, impacts related to mudflow hazards would be less than significant.

4.9.3 Regulatory Requirements

RR 4.9-1 Project construction shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002, or the latest approved general permit). This General Permit requires construction activities (including demolition, clearing, grading, excavation, and other land-disturbing activities) that result in the disturbance of one acre or more of total land area to file and submit a Notice of Intent (NOI); Risk Assessment; Site Map; Storm Water Pollution Prevention Plan (SWPPP); annual fee; and a signed certification statement to the State Water Resources Control Board prior to construction. In order to obtain coverage under the Construction General Permit, a project-specific SWPPP shall be prepared, which shall contain Best Management Practices (BMPs) that would be implemented to reduce or eliminate construction-related pollutants in the runoff.

As part of the SWPPP preparation and implementation, the design-build contractor shall also comply with the County of Los Angeles' Construction Site Best Management Practices Manual that contains the County's requirements for BMPs to include in the SWPPP and the implementation of BMPs during construction.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with these State and County regulations, including the filing of the NOI and preparation of the SWPPP prior to construction activities and the implementation of BMPs and other items in the SWPPP during construction activities for the proposed project.

RR 4.9-2 In accordance with the storm water regulations of the Cities of Los Angeles and Culver City and the County of Los Angeles, project construction and maintenance shall not involve the discharge of polluting substances (e.g., liquids, solids, gases, or other pollutants) that may pose a hazard to humans, animals, plants, and fish into the storm drain system or receiving waters. Also, refuse, rubbish, tin cans, or other matter that may impede, retard, or change the normal direction of the flow of the flood, storm, and other waters or that may be carried downstream by such waters, causing damage and detriment to downstream properties shall not be

placed in or near drainages. Runoff management requirements include good housekeeping practices and BMPs that are consistent with environmental goals.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall comply with this regulation during construction and maintenance activities on Segment C.

From Section 4.6, Geology and Soils:

RR 4.6-1 Project design and construction shall comply with Part 2 of Title 24 of the California Code of Regulations (California Building Code), which provides building standards for construction, alteration, moving, demolition, repair, maintenance, and use of all buildings or structures. The California Building Code standards were developed to safeguard public health and safety and facilitate emergency response.

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval by the County during the plan check process. Approved plans shall be implemented by the contractor.

4.9.4 Mitigation Measures

With compliance with existing regulations, the proposed project would not result in significant adverse impacts related to hydrology and water quality; therefore, no mitigation is required.

4.9.5 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impacts related to hydrology and water quality would occur with implementation of Segment C. This finding is similar to the analysis in the previous IS/MND for the Park to Playa Trail.

4.10 LAND USE AND PLANNING	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

4.10.1 Environmental Setting

Existing Land Uses

The Blair Hills area is developed with residential and recreational uses in the northern section; Culver City Park and the Baldwin Hills Scenic Overlook on the northwestern section; and oil and gas exploration, production, processing and associated activities in the southern section. The site for Segment C is located at the eastern and central sections of Blair Hills. The northwestern section of Segment C is a detention basin for the Baldwin Hills Scenic Overlook and the southern and eastern portions are vacant land that was previously used for oil and gas exploration, production, processing, and associated activities.

North of the site are residential uses, Blair Hills Park, and the future site of the Stoneview Nature Center. East of the site is La Cienega Boulevard, and the KHSRA is farther east. South of the site are the Lloyd Basin and oil and gas exploration and production areas. West of the site are oil and gas exploration and production areas, Culver City Park, and the Baldwin Hills Scenic Overlook.

Planned Land Uses

The City of Culver City's land use designations for the site include Low Density Multi-Family on the northwestern section and Open Space on the southern and eastern sections, with a Blair Hills/Baldwin Hills Focused Specific Studies Area overlay (Culver City 2007b). Low Density Multiple Family is defined as a land use designation that allows multiple-family dwellings and single-family, two-family, and three-family dwellings, with up to 15 dwelling units per net acre. Open space includes public and private parks, open space and recreational areas, bike paths, and natural areas. The Blair Hills/Baldwin Hills Focused Specific Studies Area overlay applies to areas in the Blair Hills and Baldwin Hills that require studies on slope and soil stability; soil contamination; seismic and subsidence risks; visual character and viewsheds; vehicle and pedestrian access; biological resources; recreation opportunities; protection of existing adjacent residential neighborhoods; housing opportunities to address regional needs; and limited vehicle access from La Cienega Boulevard to determine appropriate open space, residential, commercial and industrial uses and access (City of Culver City 2000). Adjacent land use designations include Open Space, with a Blair Hills/Baldwin Hills Focused Specific Studies Area overlay to the south and west; Open Space and Low Density Single Family to the north; and Low Density Multi-Family to the northwest (Culver City 2007b).

Culver City's zoning map shows an Open Space zone for the northwestern section of the site and a Residential Single Family zone for the southern and eastern portions. North and south of the site are Residential Single Family zones. To the north (Blair Hills Park) and northwest (Baldwin Hills Scenic Overlook) of the site are areas zoned as Open Space (Culver City 2007a).

The proposed pedestrian bridge would end at the western portion of the KHSRA, which is designated by the City of Los Angeles as Open Space and zoned as Open Space (OS-1XL) (City of Los Angeles 2015b). The OS zone allows for the development of "parks and recreation facilities, including bicycle trails, equestrian trails, walking trails, nature trails, park land/lawn areas, children's play areas, child care facilities, picnic facilities, and athletic fields (not to exceed 200 seats in park) used for park and recreation purposes". This zone also allows natural resource preserves, marine and ecological preserves, sanitary landfill sites, public water supply reservoirs, and water conservation areas (ALPC 2015).

Local Plans

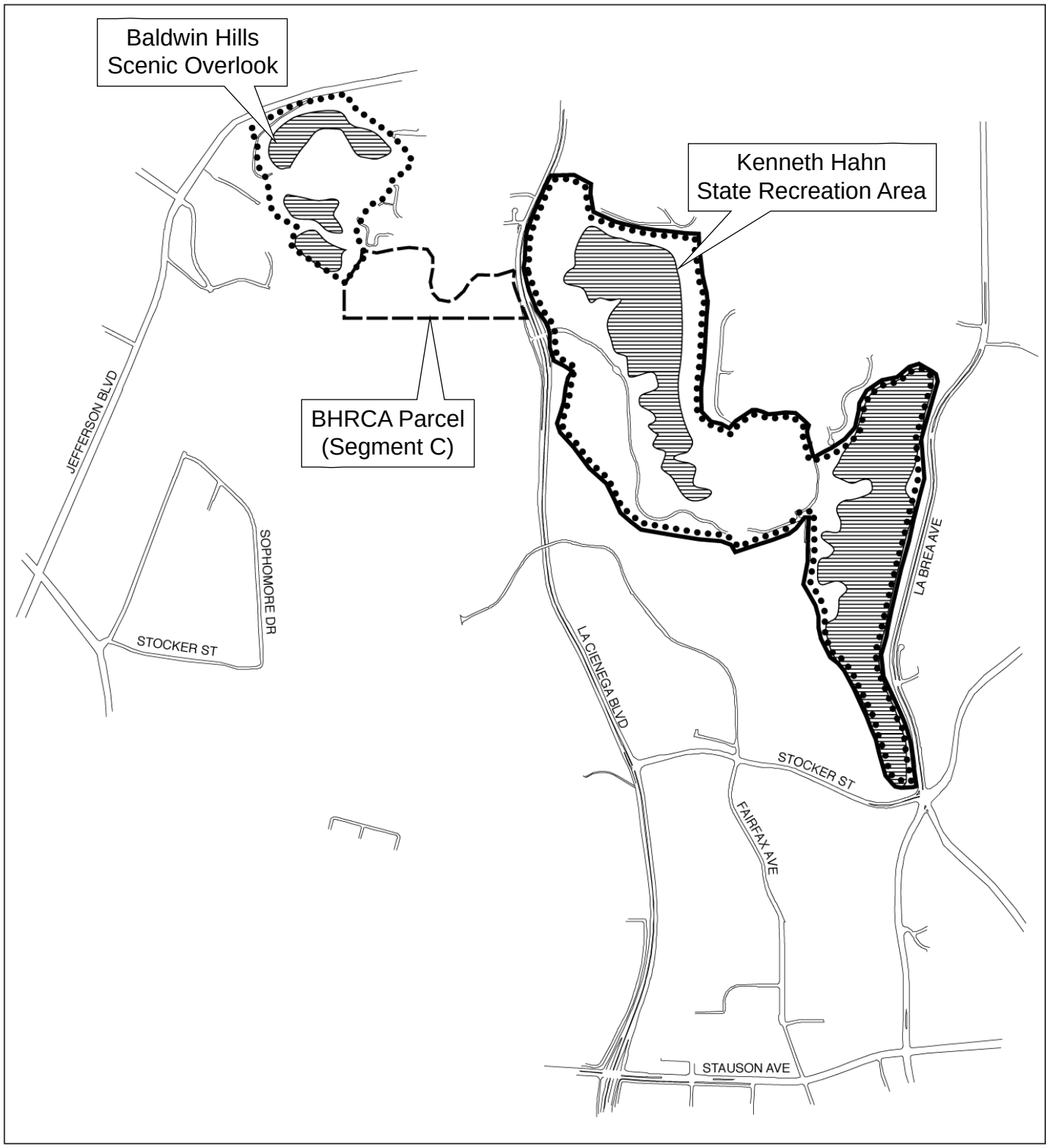
The Baldwin Hills Park Master Plan sets a vision for the preservation and expansion of the open space areas in Baldwin Hills for the creation of a large urban park. The Master Plan calls for the protection of natural habitat areas; the improvement and expansion of active and passive recreational areas; the creation of footpaths and bike trails; the provision of buffers between urban development and open space; and the preservation of steep slopes, ridgelines, and vista points (CDPR 2002a).

The Recirculated Draft Kenneth Hahn State Recreation Area General Plan Amendment and EIR serves as the master plan for the KHSRA, Baldwin Hills Scenic Overlook, and BHRCA-owned land in the Blair Hills Corridor.[11] This document outlines the State's goals and policies for future development and management of the KHSRA, the Baldwin Hills Scenic Overlook (Segment B), and Blair Hills Corridor (Segment C) parcels, as well as for improving pedestrian and vehicle access to these park facilities. The General Plan Amendment promotes greater use of the KHSRA and other nearby parks in designated Beneficial Use Management Zones, while at the same time protecting the area's natural and cultural resources in designated Resource Protection Management Zones. Exhibit 4-10 shows the Management Zones for the KHSRA.

The designated Resource Protection Management Zones include the eastern slopes along La Brea Avenue and the southwestern slopes located east of La Cienega Boulevard in the KHSRA and three separate areas in the Baldwin Hills Scenic Overlook. These zones could generally be developed with roads or trails, historic features, signs, footbridges, visitor amenities (e.g., drinking water, comfort stations, and rest areas), boardwalks, fencing, and utilities. More intensive uses (i.e., visitor centers, group picnic facilities, operations facilities or storage, parking, food services, campgrounds, and lodging) are not allowed.

The rest of the KHSRA, Baldwin Hills Corridor, and Blair Hills Corridor are designated as Beneficial Use Management Zones. These zones could generally be developed with roads, trails, bike paths, parking, picnic facilities, playgrounds, visitor centers, food services, administrative facilities, turnouts, fences, boardwalks, walls, signs, utilities, and bridges. Trails, roads, fences, utilities, boardwalks, visitor amenities, and signs are allowed in both Resource Protection Management Zones and Beneficial Use Management Zones. Parking and visitor centers are allowed only in Beneficial Use Management Zones (CDPR 2002b). Segment C is located within the Beneficial Use Management Zone.

[11] This is the property that the County has transferred to the BHRCA.



Resource Protection Management Zone

Benneficial Use Management Zone

Existing Kenneth Hahn SRA Boundary

Proposed Kenneth Hahn SRA Boundary

County-Owned Parkland

Source: California Department of Parks and Recreation 2002

Management Zones

Exhibit 4-10

Segment C of the Park to Playa Trail

N W E S

Map not to scale

BonTerra PSOMAS

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4.10.2 Impact Analysis

a) No Impact

The proposed Segment C trail would be an at-grade trail extending from the Baldwin Hills Scenic Overlook through a detention basin and along the slopes at the edge of the BHRCA property, connecting to an elevated boardwalk by the Stoneview Nature Center, and returning to an at-grade trail at the northeastern section of the BHRCA property and eventually becoming a pedestrian bridge crossing over La Cienega Boulevard to the KHSRA.

The proposed trail would not involve the demolition of existing housing units and would not pass through residential areas. The project would not divide the residential uses located north of the trail alignment. Since the project would not divide an established neighborhood, no impact would occur.

b) Less than Significant Impact

The proposed project would change the existing land use of undeveloped land in the Blair Hills Corridor into a trail. Segment C would be developed as a new trail that would connect the KHSRA to the Baldwin Hills Scenic Overlook. Since the proposed trail would be a low intensity use (characterized by the absence of structures and only limited site improvements, as well as the lack of a permanent user group), it is generally considered an allowable land use within public parks and open space areas. While the project is not subject to the land use regulations of the Cities of Culver City and Los Angeles, no conflict with the Open Space land use designations and zoning in the Cities of Los Angeles and Culver City would occur. While not necessarily permitted in the Low Density Multi-Family Residential land use designation and Residential Single Family zone in the City of Culver City, the proposed trail would not be inconsistent with these land use designations and zoning since the trail could be considered a less intensive use (or even a passive use) of the land or an accessory use to adjacent residential developments, parks, and open space.

The site is located within the Southeastern Sub-area, where a specific objective and policies have been included in the Culver City General Plan. Project consistency with these objectives and policies are discussed in Table 4-12 below.

TABLE 4-12
CONSISTENCY WITH CULVER CITY GENERAL PLAN POLICIES

General Plan Objective/Policy*	Project Consistency
Objective 27. Protect and enhance open space, residential and business uses within the Southeastern Sub-area.	The project will preserve the site as open space, with the development of a recreational trail.
Policy 27A. Protect the hillside character, while balancing opportunities for new housing and visible and useable open space by establishing hillside development standards.	The project will involve minimal grading and will preserve the site as open space.
Policy 27B. Protect the visible and useable open space resources within Blair Hills by establishing land use definitions for visual resources and natural areas that include guidelines for use.	The project will preserve the site as open space.
Policy 27C. Improve the Southeastern Sub-area's aesthetic image and identity as part of Culver City by assigning high priority to streetscape improvements and City signage along east Jefferson Boulevard and along La Cienega Boulevard south of Wrightcrest Drive.	The project will improve the aesthetic quality of the site through the development of a recreational trail and revegetation of adjacent areas. The pedestrian bridge is not anticipated to result in visual degradation.

TABLE 4-12
CONSISTENCY WITH CULVER CITY GENERAL PLAN POLICIES

General Plan Objective/Policy*	Project Consistency
Policy 27D. Protect views of and from Blair Hills by establishing viewshed guidelines.	The project will include a landscaped buffer to prevent view intrusion into adjacent residences while protecting the views from nearby residences.
Policy 27E. Protect existing hillside uses and potential future uses by updating existing studies and requiring new ones concerning soil, and seismic stability in Blair Hills, with respect to the Alquist-Priolo Earthquake Fault Zone and earthquake faults.	As discussed under RR 4.6-2 in Section 4.6, Geology and Soils, a geotechnical investigation will be conducted to identify geologic and seismic hazards and to provide design parameters, factors and recommendations. The proposed trail would be designed and built to maintain structural stability.
Policy 27F. Prepare a feasibility study and a Focused Special Study for the undeveloped portions of the Blair Hills/Baldwin Hills area to:	Consistency with each bullet point is provided below:
• Determine the appropriate range of uses and development standards for the south side of Jefferson Boulevard between Culver City Park and the multiple family residential area.	This area has been developed with the Baldwin Hills Scenic Overlook. The project would connect to but not adversely affect the overlook.
• Assess the existence and value of biological and cultural resources with the undeveloped Blair Hills/Baldwin Hills Area.	Biological and cultural resources assessments have been completed as part of this IS/MND and the previous IS/MND for the Park to Playa Trail.
• Assess the slope, soil and seismic conditions of the undeveloped areas to determine capability for supporting desired uses.	As discussed under RR 4.6-2 in Section 4.6, Geology and Soils, a geotechnical investigation will be conducted to identify site-specific geologic and seismic characteristics and to provide design parameters, factors and recommendations.
• Identify scenic views and viewsheds to be preserved and enhanced as part of any future development.	A landscaped buffer is proposed to prevent view intrusion into adjacent residences while protecting the views from nearby residences.
• Determine the benefit to Culver City of annexing the unincorporated Los Angeles County lands west of La Cienega Boulevard by investigating the feasibility and appropriateness of open space and residential development.	The site is within the corporate boundaries of Culver City.
• Determine appropriate locations and limitations for vehicle and pedestrian access to and within the Focused Special Study Area without allowing cut-through traffic.	No new vehicle access location is proposed by the project. Pedestrian access would be provided through a pedestrian bridge from the KHSRA and trail connection to the parking lot of the Baldwin Hills Scenic Overlook.
* Source: Culver City 2000.	

The Blair Hills/Baldwin Hills Focused Specific Studies Area overlay calls for studies on slope and soil stability, soil contamination, seismic and subsidence risks, visual character and viewsheds, vehicle and pedestrian access, biological resources, recreation opportunities, protection of existing adjacent residential neighborhoods, housing opportunities to address regional needs, and limited vehicle access from La Cienega Boulevard. The site is located within this overlay and, as required for the Blair Hills/Baldwin Hills Focused Specific Studies Area overlay, these issues are addressed in this IS/MND under Aesthetics, Biological Resources, Geology and Soils, Hazards and Hazardous Materials, Population and Housing, Recreation, and Transportation.

The proposed trail and trail improvements would not lead to any land use incompatibility with residential designations and zones, as setbacks and buffers would be provided between the trail and the adjacent residences. Existing block walls, intervening trees, and elevation differences also separate the existing residences from the trail alignment. Therefore, no conflict with current land use designations or zoning would occur.

While the project would not be a major component in the Baldwin Hills Park Master Plan's goal for the development of a large urban park, it will provide better connections between the various parks and recreational facilities in the Baldwin Hills and Blair Hills areas. As such, the project would not conflict with this park master plan and no adverse impact would occur.

As stated, the KHSRA General Plan Amendment establishes Management Zones, which are specific geographic areas for which management directions or prescriptions have been defined regarding resource management, visitor use, access, facilities or development, and operations, based on an evaluation of the KHSRA's natural, cultural, and recreational features. The proposed trail improvements (i.e., trail, fences, pedestrian bridge, interpretive node, elevated boardwalk, and signs) for Segment C are permitted uses in both designated Beneficial Use Management Zones and Resource Protection Management Zones. Therefore, no conflict with permitted uses in the KHSRA General Plan Amendment document would occur with the project.

The project would implement the trail improvement goals of the KHSRA General Plan Amendment through improved connections to various trails and park facilities. Natural open space preservation and habitat restoration goals would also be met through planned habitat restoration and revegetation of disturbed areas. Also, the project would expand parkland through the development of a trail through the site, which would be open to public use.

The Resource Management goals for the KHSRA are listed below in Table 4-13, along with the project's consistency with each goal.

TABLE 4-13
CONSISTENCY WITH KHSRA GENERAL PLAN AMENDMENT

Goal*	Project Consistency
Natural Resources	
Consider preparation of a Resource Management Plan for Kenneth Hahn State Recreation Area	Not applicable as this is a management goal.
Maintain and enhance the movement of native animals through the park and regional ecosystem	As discussed in Section 4.4, Biological Resources, the proposed trail would be located at the northern edge of the Inglewood oilfield and would not restrict the movement of wildlife in the area.
Maintain, protect, and/or improve habitat for special status species	As discussed in Section 3.0, disturbed areas along the trail would be revegetated with native plants.
Manage the park to protect and restore natural watershed functions	The proposed trail would be pervious and at-grade, while the pedestrian bridge would cross over a drainage channel. No major changes to drainage patterns would occur, as discussed in Section 4.9, Hydrology and Water Quality.
Prevent outside disturbances from having adverse impacts on park resources to the extent practicable	As discussed in Section 3.0, fences and landscaped buffers would be provided along the trail to prevent outside disturbances.
Restore, protect, and maintain native ecosystems and indigenous flora and fauna through active resource management programs	Disturbed areas along the trail would be revegetated with native plants.
Protect special plants and special plant communities within Kenneth Hahn State Recreation Area to ensure their sustainability in accordance with state law (PRC, Division 2, Chapter 10, Section 1900)	Disturbed areas along the trail would be revegetated with native plants. The proposed trail has been aligned to stay away from sensitive vegetation types and habitats.
Protect, perpetuate, and restore native wildlife populations and native aquatic species at KHSRA	Disturbed areas along the trail would be revegetated with native plants.

TABLE 4-13
CONSISTENCY WITH KHSRA GENERAL PLAN AMENDMENT

Goal*	Project Consistency
Provide appropriate open space buffers	Fences would be provided between the trail and adjacent oil and gas exploration, production, processing and associated activities while existing walls and proposed fences and landscape buffers would separate the trail from abutting residential uses.
Cultural Resources	
Identify and protect all significant cultural sites and features within Kenneth Hahn State Recreation Area	Cultural resources in the area have been identified in Section 4.5 of this IS/MND and mitigation measures have been provided to reduce potential impacts to less than significant levels.
Aesthetic Resources	
Protect scenic features from man-made intrusions and preserve the visitor's experience of the natural landscape by minimizing adverse impacts to aesthetic resources	As discussed in Section 4.1, no significant adverse impacts to scenic resources are expected, and the proposed trail would provide enhanced opportunities for scenic views. Mitigation measures have been provided to reduce impacts from light and glare.
Recreational Uses	
Provide for appropriate, sustainable visitor uses of the park and at the same time protect resources	The proposed trail would encourage use of adjacent parks, while the proposed fencing would protect adjacent oil drilling activities; revegetation would preserve biological resources; and mitigation has been provided to protect cultural resources.
Provide appropriate access and opportunities for the visiting public to enjoy the park, while not degrading the natural/cultural features and ecological processes	The proposed trail would improve access to parks and open space areas, including ADA access, while habitat restoration and revegetation would preserve natural resources.
Provide appropriate trails	The project would connect existing trails in the area.
Provide appropriate education and interpretation	Trail improvements would include an interpretive node and signage on Segment C.
Social Resources	
Provide for appropriate public safety and law enforcement	Police services in the area are provided by the County Sherriff's Department, Los Angeles Police Department, State Rangers, and Culver City Police Department, which will remain the same with the project. Signs shall be provided along the trail to identify activity restrictions.
Provide appropriate park administration and maintenance facilities	Current KHSRA park administration and maintenance would not change, with the project added into the maintenance schedule for the KHSRA.
Provide appropriate neighborhood buffers	Existing and proposed walls and fences, elevation differences, and proposed landscaping would separate the trail from adjacent residences.
Provide appropriate economic opportunities	Not applicable as this is a management goal.
Provide appropriate park maintenance	Trail maintenance would be provided by the KHSRA maintenance crew.
Use principles of sustainability in the design and implementation of all park facilities	The trail would have a native soil surface, and native, drought-tolerant plants would be used for revegetation.
Unitwide Interpretation	
Provide the opportunities to increase the visitors' knowledge and appreciation of the significant natural and cultural resources of KHSRA.	Trail improvements would include an interpretive node and signage that would inform on natural and cultural resources in the area.

TABLE 4-13
CONSISTENCY WITH KHSRA GENERAL PLAN AMENDMENT

Goal*	Project Consistency
Recreation Carrying Capacity	
The Department should develop a park-specific adaptive management program to evaluate the recreational carrying capacity of the park.	Not applicable as this is a management goal.
Acquisitions	
Acquire properties adjacent to boundaries that are beneficial for increased parking; day use activities; trail connections; and habitat corridors	Not applicable as this is a management goal.
* Source: CDPR 2002b.	

Segment C would not conflict with regional plans, policies, or regulations related to land use and planning, including SCAG's Regional Comprehensive Plan (RCP), the Regional Housing Needs Assessment (RHNA), and the RTP/SCS or other regional plans since the project is limited in scope and would not conflict with the growth and development forecast assumptions used in these regional plans (i.e., the project will not require a change in the current land use designations or generate a permanent population, housing, or employment in the area).

Also, no conflict with the Baldwin Hills Park Master Plan and KHSRA General Plan Amendment would occur. The proposed trail improvements would be consistent with applicable guidelines in the County Trail Manual. The project has also been designed to comply with ADA standards, as discussed in Section 3.2 of this IS/MND.

Impacts on land use policies would be less than significant.

c) No Impact

As discussed in Section 4.4, Biological Resources, the site for Segment C is not located within the boundaries of an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). No County-designated Significant Ecological Area is located on or near the site. Therefore, no impact to an HCP or NCCP would occur.

4.10.3 Mitigation Measures

No adverse impacts related to land use and planning would occur; therefore, no mitigation is required.

4.10.4 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impacts related to land use and planning would occur with implementation of Segment C. This finding is similar to the analysis in the previous IS/MND for the Park to Playa Trail.

4.11 MINERAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

4.11.1 Environmental Setting

Aggregate Resources

There are no regionally significant aggregate resources (i.e., sand and gravel resources) in the Blair Hills or KHSRA, as identified by the California Department of Conservation (CDMG 1994). There are no ongoing mining activities in or near the proposed trail alignment for Segment C.

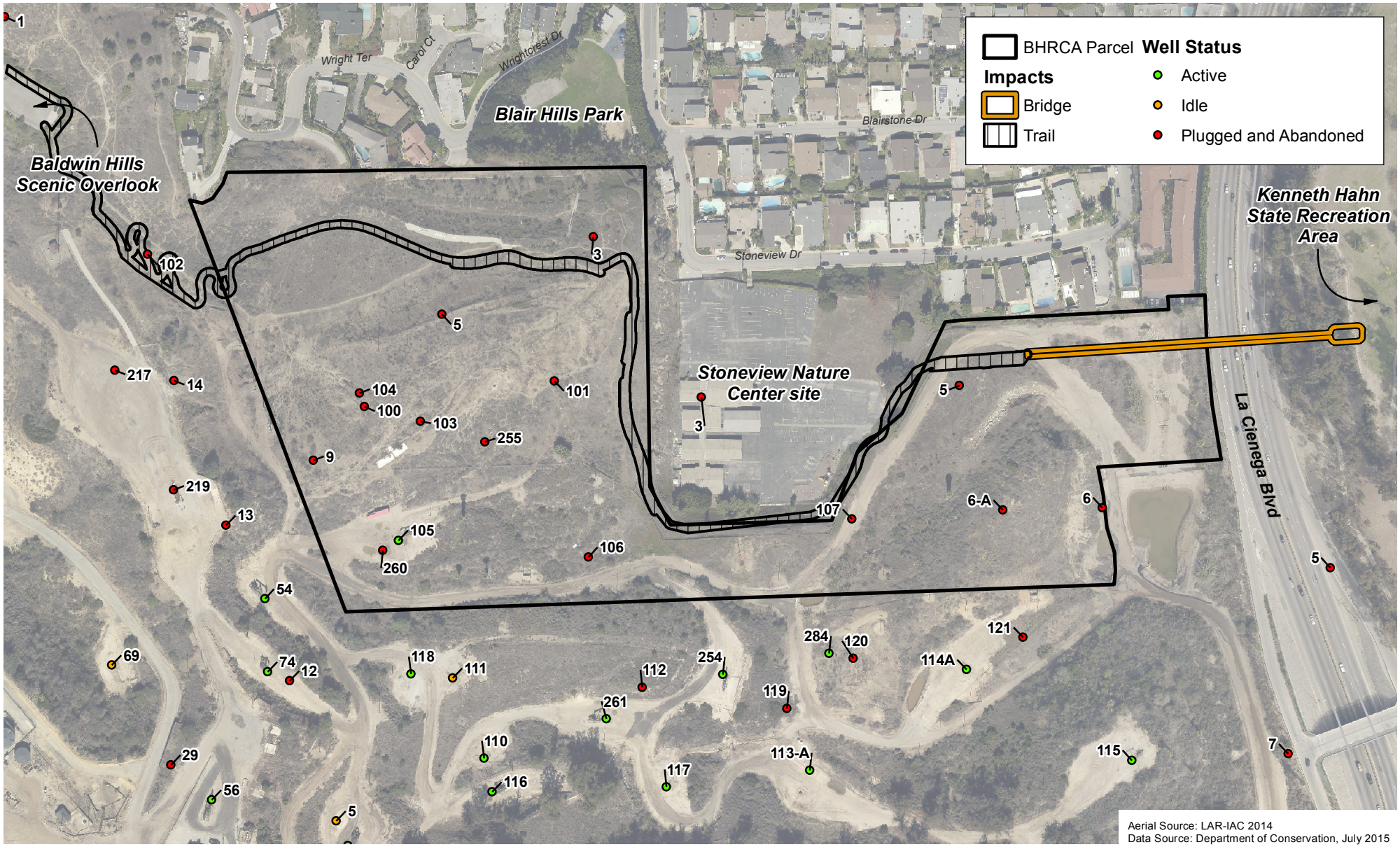
Oil Resources

While not a mineral resource, oil is addressed in this section due to the presence of significant oil resources in the project area. The Inglewood oilfield underlies the west-central and south-central portions of the Baldwin Hills, covering approximately 700 acres. Oil wells have been in production in this oilfield since 1924, with as much as 50,000 barrels of oil produced daily in 1925 and an estimated total of 368 million barrels of oil and 269 billion cubic feet of natural gas produced over the years. The southern area of the hills is developed with over 1,200 oil wells, aboveground tanks, pipes, access roads, and other oil and gas exploration, production, processing and associated facilities. In 2000, only 430 wells remained active, with 215 inactive wells and 530 abandoned wells (CDPR 2002b). Oil production in the Inglewood oilfield in 2011 was estimated at over 2.7 million barrels, along with 1.3 million cubic feet of gas and 131.1 million barrels of brine water (DOGGR 2014).

There are numerous active oil wells south of the alignment of Segment C and there are plugged oil wells near the proposed trail alignment (DOGGR 2015). Exhibit 4-11 shows the location of oil and gas wells on and near the site.

Chapter 11.12 of the Culver City Municipal Code outlines the City's requirements for obtaining an oil, gas or hydrocarbon well permit and for operating such well. The City's existing regulations allow the drilling of only one well or well hole for every five full acres for each oil-producing zone in the operating unit. Chapter 11.12.105 prohibits a well hole within 300 feet of any major public street, sidewalk, or highway; within 100 feet of the outer boundary of the parcel of land; within 100 feet of any steam boiler building or source of ignition; and within 300 feet of any school buildings or other places of public assemblage.

The City of Culver City has developed draft oil drilling regulations for the Inglewood oilfield that is undergoing review. It defines a Developed Area as a lot of parcel with a residential, recreational, institutional, commercial, industrial or office building or use. A Sensitive Developed Area is a lot or parcel with a single- or multi-family residence, park, school or health care facility. Residential areas north of the site would be considered Developed Areas and Sensitive Developed Areas.



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Oil and Gas Wells

Exhibit 4-11

Segment C of the Park to Playa Trail

N W E S

250 125 0 250 Feet

BonTerra PSOMAS

(Rev: 11-16-2015 CJS) R:\Projects\Alta (ALT)\3ALT000302\Graphics\ISMND\Ex4-11_oil_gas_wells_20151113.pdf

The ordinance prohibits the construction of major facilities in the City and only allows wells and associated equipment. Also, no new storage tank is allowed within 500 feet of Developed Areas and 200 feet from a public road. Downhole submersible pumps and low-profile pumping units are required for production wells if they are visible to surrounding residences and park users. It also prohibits drilling within 400 feet of Developed Areas and within 75 feet of public roadways. It sets regulations and required plans, studies, and other information for slant drilling within 800 feet of Sensitive Developed Areas. Pipelines must be buried within 500 feet of a residential, commercial, cultural, educational, religious, or government building. Landscaping and/or fencing is required to screen oilfield operations from adjacent residential, recreational, and institutional land uses and public streets. Screening is required for all new point lighting sources to prevent light spillover onto surrounding residential, recreational, and other Sensitive Developed Areas. Identification signs with emergency information must be provided along the required outer boundary line fence. Equipment and materials not necessary to oil operations must be promptly removed from view of Sensitive Developed Areas.

4.11.2 Impact Analysis

a) No Impact

The proposed trail alignment for Segment C has been redefined to run along the northern edge of the BHRCA parcel. The trail would not go through areas that are subject to ongoing oil and gas exploration, production, processing, and other associated activities. The existing unpaved access road would be relocated to the south, and fences would be provided to separate the proposed trail from adjacent oil production activities. Should old abandoned or plugged wells be encountered during construction activities, DOGGR regulations would have to be followed, as discussed in Section 4.8, Hazards and Hazardous Materials. Compliance with existing DOGGR regulations would prevent hazards from abandoned or plugged wells and would maintain future access to the wells.

The proposed trail is also not considered a place of public assembly and would not conflict with current regulations for oil, gas, and hydrocarbons in the Culver City Municipal Code. The proposed trail is also not considered a public road that may affect proposed setbacks in Culver City's draft oil drilling regulations, if adopted. And while the use of the proposed trail would be recreational in nature, it does not propose a public park and would not involve the concentration of people and the length of use that is generally associated with recreational activities that occur at parks and developed recreational facilities (e.g., game fields). Thus, it would not be considered a "Developed Area" under the proposed regulations and thus, would not change future oil drilling operations in the Inglewood Oilfield. No loss of availability of a known mineral resource would occur.

No regionally significant aggregate resources have been identified on or near the proposed trail alignment for Segment C. Construction of Segment C would utilize relatively small quantities of sand, gravel, concrete, stone, metal, and other materials. The limited size of the trail and proposed improvements would not result in any measurable loss in the availability of regionally important mineral resources. No impact would occur.

b) No Impact

As indicated above, no impact on ongoing oil and gas production activities in the Inglewood oilfield would occur with the project. Also, impervious surfaces for the steps, pedestrian bridge and boardwalk foundations, and footings for signs, benches, interpretive node, and trash can would be limited in size and would not preclude access to underlying oil and gas resources. The project has been designed to prevent impacts on nearby oil and gas exploration, production, processing,

and associated activities. The project would not affect access to and the availability of underlying local oil and gas resources. No impact would occur.

4.11.3 Mitigation Measures

No significant adverse impacts related to mineral resources would occur; therefore, no mitigation is required.

4.11.4 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impacts related to mineral resources would occur with implementation of Segment C. This finding is similar to the analysis in the previous IS/MND for the Park to Playa Trail.

4.12 NOISE	**Potentially Significant Impact**	**Less Than Significant With Mitigation**	**Less Than Significant Impact**	**No Impact**
Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

4.12.1 Environmental Setting

Noise-sensitive receptors generally refer to humans who are engaged in activities or are utilizing land uses that may be subject to the stress of significant interference from noise. Residential dwellings are the primary noise-sensitive land use because of the potential for increased and prolonged exposure to excessive, disturbing, or offensive interior or exterior noise levels that could interfere with sleeping, relaxation, and other daily activities. Hospitals, schools, places of worship, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses. Noise-sensitive receptors near Segment C include residences located north of the BHRCA property.

The primary sources of noise along the trail alignment and in the nearby residential areas are vehicle noise and maintenance activities. Vehicle noise is heard from traffic on La Cienega Boulevard and from aircraft overflights from the Santa Monica Airport and Los Angeles International Airport (LAX). Ambient noise levels were measured near Segment C and nearby residences on October 23, 2012, as provided in Table 4-14. While these measurements are not recent, no new noise sources or major changes in land uses have occurred in the area (the proposed Stoneview Nature Center is not yet open to the public). Thus, these readings are expected to remain representative of ambient noise levels.

TABLE 4-14
NOISE MEASUREMENT DATA

Site	Location	Time	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Notes
1	Segment C (Blair Hills Corridor) behind residence on Stoneview Dr, east of the Stoneview Nature Center site	11:34 AM–11:52 AM	52	37	70	Noise from adjacent apartment complex. L_{max} from a motorcycle on La Cienega Blvd

L_{eq}: average noise level; dBA: A-weighted decibels; L_{min}: minimum noise level; L_{max}: maximum noise level.
All measurements made on October 23, 2012. Noise measurement data are provided in Appendix E.

Applicable Regulations

City of Los Angeles

Chapter XI, Noise Regulation, of the City of Los Angeles Municipal Code is the City's noise ordinance. Section 112.03 of the noise ordinance, Construction Noise, states, "Noise due to construction or repair work shall be regulated as provided by Section 41.40 of this Code". Section 41.40 specifies the prohibited hours of construction, as follows:

> (a) No person shall, between the hours of 9:00 PM and 7:00 AM of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling, hotel, apartment, or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. . .
>
> (b) The provisions of Subsection (a) shall not apply to any person who performs the construction, repair or excavation work involved pursuant to the express written permission of the Board of Police Commissioners through its Executive Director. The Executive Director, on behalf of the Board, may grant this permission, upon application in writing, where the work proposed to be done is in the public interest, or where hardship or injustice, or unreasonable delay would result from its interruption during the hours mentioned above, or where the building or structure involved is devoted or intended to be devoted to a use immediately related to public defense. . .
>
> (c) . . . No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter 1 of this Code, or perform such work within 500 feet of land so occupied, before 8:00 AM or after 6:00 PM on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specified.

Section 112.05 of the Noise Ordinance, Maximum Noise Level of Powered Equipment or Powered Hand Tools, includes the following:

> Between the hours of 7:00 AM and 10:00 PM, in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:
>
> (a) 75 dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
>
> Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 111.03 of the Noise Ordinance presumes that daytime noise levels in a residential area are 50 A-weighted decibels (dBA).

City of Culver City

Section 9.07.035 of the Culver City Municipal Code states that all construction activities shall be prohibited, except between the hours of 8:00 AM and 8:00 PM Monday through Friday; between 9:00 AM and 7:00 PM on Saturdays; and between 10:00 AM and 7:00 PM on Sundays.

County of Los Angeles

Section 12.08.440 of the Los Angeles County Code prohibits construction noise between the hours of 7:00 PM and 7:00 AM on weekdays and at any time on Sunday or a federal holiday if it creates a disturbance across a residential or commercial property line. In addition, Section 12.12.030 of the County Code prohibits construction or repair work of any kind upon any building or structure or the performance of any earth excavation, filling, or moving where any of the foregoing entails the use of air compressors, jackhammers, power-driven drills, riveting machines, excavators, diesel-powered trucks, tractors, or other earth-moving equipment; hand hammers on steel or iron; or any other machine, tool, device, or equipment that makes loud noises to the disturbance of persons occupying sleeping quarters in a dwelling, apartment, hotel, mobile home, or other place of residence on a Sunday or at any other time between the hours of 8:00 PM and 6:30 AM the following day. The County also sets maximum noise levels for construction equipment, as summarized in Table 4-15.

TABLE 4-15
COUNTY OF LOS ANGELES CONSTRUCTION EQUIPMENT NOISE LIMITS

Source	Maximum Noise Level, dBA, at		
	Single-Family Residential	Multi-Family Residential	Semi-Residential or Commercial
Mobile Equipment – Intermittent, short-term operation (less than 10 days)			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	75	80	85
Daily, 8:00 PM to 7:00 AM, and all day Sundays and legal holidays	60	64	70
Stationary Equipment – Repetitively scheduled and relatively long-term operation (periods of 10 days or more)			
Daily, except Sundays and legal holidays, 7:00 AM to 8:00 PM	60	65	70
Daily, 8:00 PM to 7:00 AM, and all day Sundays and legal holidays	50	55	60
dBA: A-weighted decibels Source: Los Angeles County Code §12.08.			

In addition, Section 12.12.050 of the County Code states that the provisions of Section 12.12.030 do not apply to any person who performs the construction, repair, excavation or earthmoving work involved pursuant to the express written permission of the County Engineer to perform such work at times prohibited in Section 12.12.030. Upon receipt of an application in writing therefor, stating the reasons for the request and the facts upon which such reasons are based, the County Engineer may grant such permission if he finds that:

A. The work proposed to be done is effected with a public interest; or

B. Hardship or injustice, or unreasonable delay, would result from the interruption thereof during the hours and days specified in Section 12.12.030.

4.12.2 Impact Analysis

a, d) Less Than Significant Impact With Mitigation

Construction noise generation from the project would be related primarily to the use of diesel engine driven equipment (e.g., loaders and backhoes) which, when operating at full power, can generate maximum noise levels (L_{max}) of up to 85 dBA[12] at 50 feet. Because this equipment generally operates at full power approximately 40 percent of the time, the loudest L_{eq} would be approximately 81 dBA at 50 feet. Due to geometric spreading, noise levels would diminish with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 81 dBA measured at 50 feet from the source to the receptor would be reduced to 75 dBA at 100 feet; 69 dBA at 200 feet; and 61 dBA at 500 feet. Where the noise path (the line of sight between a noise source and a receptor) is less than 10 feet above a planted area (called "soft" site conditions) or passes through dense trees, the noise level will be further reduced by absorption of noise.

The majority of work on the trail alignment would be completed by hand tools. However, diesel-engine driven construction and material handling equipment would be used for grading, movement of materials, paving, and construction of the pedestrian bridge over La Cienega

[12] L_{max} means the maximum A-frequency-weighted sound level (decibels) during a stated time period.

Avenue. It is anticipated that the diesel equipment would consist of backhoes and loaders and, because of the terrain and access constraints, construction equipment would be smaller and lighter than typical equipment used for construction of roadways and mass grading. Typical noise specifications for backhoes and loaders state a maximum noise level of 80 dBA at a distance of 50 feet. However, data from extensive sampling of actual equipment noise levels state that maximum noise levels for backhoes are typically 78 dBA and are 79 dBA for front end loaders (FHWA 2006). These are conservative values for the lighter equipment that would be used to construct the proposed trail improvements.

Noise from project construction would be heard at nearby residences. The closest sensitive noise receptors at Wright Terrace and Stoneview Drive are 50 to 75 feet from locations where equipment would be operated. The maximum noise level at 50 feet from a front end loader would be 80 dBA and the average noise level, because of changes in power level, would be approximately 76 dBA. At any receptor, the maximum noise levels from construction equipment would occur intermittently and occasionally because the equipment would be at the closest point for only short periods. Average noise levels, L_{eq}, at sensitive receptors are not anticipated to exceed the County's Noise Ordinance limit of 75 dBA at single-family residences. Further, construction equipment noise at individual receptors would be limited to those periods when the equipment is used in the vicinity of the receptors. Construction activities would also be limited to the hours defined by the Cities of Los Angeles and Culver City and the County of Los Angeles municipal codes. RR 4.12-1 requires compliance with the combined time restrictions of the three jurisdictions to the most restrictive limits and with other applicable noise regulations.

However, in order to prevent adverse traffic impacts, MM 4.16-1 requires that any temporary and partial closure of travel lanes on La Cienega Boulevard shall be scheduled during the nighttime hours from 9 PM to 6 AM of the following day. Thus, construction activities for the pedestrian bridge may violate the construction time limits under RR 4.12-1. The design-build contractor would have to obtain a permit for nighttime or Sunday construction work from the County Engineer per Section 12.12.050 of the Los Angeles County Code. The design-build contractor shall also request permissions from the Cities of Culver City and Los Angeles for any nighttime and Sunday work. In addition, noisiest activities (as associated with the construction of bridge foundations and ramps) shall be scheduled during the hours allowed under RR 4.12-1 to the extent feasible, and noise reduction measures shall be implemented, including noise barriers between the noise source and the adjacent residences, to ensure that noise from construction activities do not exceed the County's standards for noise levels at residential areas, as generated by mobile and stationary equipment during the hours of 7:00 p.m. to 8:00 a.m. and all day on Sunday and legal holidays (MM 4.12-2).

Therefore, nearby residents and other persons would not be exposed to noise levels in excess of County or the Cities of Los Angeles and Culver City standards. Because of the limited duration of construction equipment noise, the noise increases would not be substantial.

Thus, MM 4.12-1 would ensure that construction equipment has prescribed mufflers; that stationary equipment, staging areas, and parking areas are located as far from sensitive receptors as feasible; and that noise from stationary equipment would be limited. MM 4.12-2 would prevent adverse noise impacts during nighttime and Sunday construction activities. Impacts would be less than significant after mitigation.

b) Less than Significant With Mitigation

Vibration may be perceived when large bulldozers or large loaded trucks are operated within 25 feet of receptors, but the use of large construction equipment is not planned for the project. As described above, the use of diesel engine driven equipment would be limited and equipment use

would not occur within 25 feet of sensitive receptors. There would be no vibration impact from trail construction. However, as discussed in Section 3.0, a conceptual design for the pedestrian bridge has not been developed. It is possible that caissons or piles would be required for the foundations of the bridge.

Groundborne vibration generated by construction projects is usually highest during pile driving and rock blasting. While there would be no rock blasting, piles may be needed for pedestrian bridge construction. Therefore, to avoid a significant impact due to groundborne vibration, MM 4.12-3 would be incorporated into the project if caissons or piles are required for the bridge foundations. MM 4.12-3 requires a vibration analysis to show construction vibrations would not cause structural damage or substantial annoyance at nearby residences. Implementation of the recommendations in the vibration analysis would reduce impacts to less than significant levels.

c) Less than Significant Impact

Segment C would generate limited vehicle traffic from trail users and maintenance visits. There would be no measurable increase in ambient noise levels due to these intermittent mobile sources. As existing, noise would be generated by adjacent residential activities and oilfield operations, as well as from the users of nearby parks and trails.

There would be noise from trail users on Segment C. However, these trail users will be on the trail for short periods of time and on an irregular basis. Audible noises from these users would also be infrequent. The landscaped buffer between the trail and adjacent residences would also dampen noise. Thus, the potential for hearing voices from Segment C would not result in a substantial permanent increase in ambient noise levels. Noise would also be generated by the use of maintenance equipment during the performance of intermittent trail maintenance tasks. This noise would be similar to maintenance noises currently occurring at nearby residences and parks and would not result in a substantial increase in ambient noise levels. Impacts would be less than significant; and no mitigation would be required.

e, f) No Impact

The nearest airport to Segment C is the Santa Monica Municipal Airport, approximately 3.6 miles to the west. The Airport Influence Area for this airport does not include the trail alignment or nearby areas (ALUC 2003b). The proposed project would not include the development of noise-sensitive uses. While aircraft overflights would continue to be audible in the project area, users of the proposed trail would not be exposed to excessive aircraft noise levels. No impact would occur.

4.12.3 Regulatory Requirements

RR 4.12-1 Project construction shall comply with the most restrictive time limits and other applicable noise regulations of the City of Los Angeles, the City of Culver City, and County of Los Angeles municipal codes. Construction using any equipment that makes loud noises that would disturb persons in nearby residences (including the operation, repair, or servicing of construction equipment and the job site delivering of construction materials) shall be limited to the hours of 8:00 AM to 7:00 PM, Monday through Friday and from 9:00 AM to 6:00 PM on Saturday. No construction shall be allowed on Sundays or holidays.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be approved by the County during the plan check process), and the contractor shall implement this RR during construction activities.

4.12.4 Mitigation Measures

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

a. All construction vehicles or equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers. Mufflers shall be equivalent to or of greater noise reducing performance than the manufacturer's standard.

b. Stationary equipment, such as generators and air compressors, shall be located as far from local residences and parks, as feasible. Where stationary equipment must be located within 250 feet of a residence, the equipment shall be equipped with appropriate noise reduction features (e.g., silencers, shrouds, or other devices) to limit the equipment noise at the sensitive receptor to an average noise level (L_{eq}) of 65 A-weighted decibels (dBA).

c. Equipment maintenance, vehicle parking, and material staging areas shall be located as far away from local residences, as feasible.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be approved by the County during the plan check process), and the contractor shall implement this MM during construction activities.

MM 4.12-2 If nighttime or Sunday work for pedestrian bridge construction is necessary to avoid lane closures on La Cienega Boulevard during the daytime hours from Monday to Saturday, the design-build contractor shall obtain a permit for nighttime or Sunday construction work from the County Engineer per Section 12.12.050 of the Los Angeles County Code. The design-build contractor shall also request permissions from the Cities of Culver City and Los Angeles for any nighttime and Sunday work. In addition, the noisiest activities (as associated with the construction of bridge foundations and ramps) shall be scheduled, to the extent feasible, between 8:00 a.m. and 7:00 p.m., Monday through Saturday. Otherwise, noise barriers, equipment enclosures, hospital-grade mufflers and/or other noise reduction measures shall be provided between the noise source and the adjacent residences to ensure that noise from construction activities do not exceed the County's standards for noise levels at residential areas, as generated by mobile and stationary equipment during the hours of 7:00 p.m. to 8:00 a.m. and all day on Sunday and legal holidays.

The design-build contractor shall include this MM in the Contractor Specifications (which shall be approved by the County during the plan check process), and the contractor shall implement this MM during construction activities.

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

The design-build contractor shall submit the vibration analysis to the County for review and approval during the plan check process, and the contractor shall implement the recommendations in the vibration analysis during construction activities.

4.12.5 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impact related to noise would occur with the implementation of MMs 4.12-1, 4.12-2 and 4.12-3.

The impacts of Segment C on noise would be greater than the impacts of the Park to Playa Trail (as discussed in the previous IS/MND) due to the proposed pedestrian bridge over La Cienega Boulevard, which was not included in the previous proposal for Segment C. Implementation of MMs 4.12-1, 4.12-2 and 4.12-3 would reduce the impacts of Segment C to less than significant levels.

4.13 POPULATION AND HOUSING	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

4.13.1 Environmental Setting

As of January 2015, the City of Culver City had an estimated population of 39,773 residents and a housing stock consisting of 17,563 dwelling units. The City of Los Angeles had an estimated population of 3,957,022 residents and a housing stock of 1,440,779 units. The County of Los Angeles had a population of 10,136,559 residents and a housing stock of 3,487,434 units (DOF 2015).

Nearby Residents and Residences

There are no dwelling units or permanent residents on the proposed trail alignment for Segment C. The proposed trail would pass through undeveloped land that is adjacent to existing residences along Stoneview Drive, Wright Terrace, and Wrightcrest Drive (north of the site).

Trail Users

The eastern and southern portions of the site are fenced off and not open to public use or access. Existing trail users in the area include residents and other individuals who come to the Baldwin Hills to utilize the recreational facilities and trails afforded by the existing parks and open spaces. While no comprehensive count of trail or park users has been made, the KHSRA has been estimated to have as many as 20,000 visitors during summer weekends. A survey of trail users indicates that most users drive to the trails (78 percent); some users use the bicycle (30 percent); some walk to the trails (25 percent); and others use public transit (3 percent)[13] (Alta 2011).

4.13.2 Impact Analysis

a) No Impact

Construction of Segment C would not involve housing or business development and, thus, would not lead to the introduction of permanent residents or employees into the Blair Hills or the KHSRA. Also, no extension of utility lines or roadways to unserved areas is proposed as part of the project. The proposed utility line undergrounding on La Cienega Boulevard does not include an extension or upgrade of the lines. The presence of Segment C is not expected to be the major factor in the

[13] Percentage does not total 100% since some of the 170 survey respondents provided more than 1 response.

selection of home purchases or household location in the Baldwin Hills or Blair Hills area. Therefore, no direct or indirect population growth would occur with the proposed project.

Area residents are expected to continue to utilize existing trails for walking, hiking, jogging, biking, dog walking, and other recreational uses and persons from farther locations would also continue to come to the area to use the trails and recreational facilities. An increase in the number of persons using the Park to Playa Trail, including Segment C, could be expected as Segment C would connect the trails at KHSRA (and other trails farther east) with those in the Baldwin Hills Scenic Overlook and Culver City Park (and other trails farther southwest to the Pacific Ocean). However, this use would still be confined to a few minutes or a few hours during the daytime as users pass through the area to use local trails and nearby recreational amenities. No permanent resident population would be created by the project. This use would not generate a large and steady demand for local goods or services that could spur business development in the surrounding area.

Construction activities would lead to a temporary increase in the daytime population, but construction workers would be limited in number and would not generate a large and steady demand for local goods or services that could spur business development in the surrounding area. Maintenance visits for Segment C would be provided by existing KHSRA staff and would not generate new demand for local goods or services that may induce growth in the area. No impact related to direct or indirect population growth would occur with the proposed project.

b, c) No Impact

The residences adjacent to the proposed trail alignment for Segment C would not be demolished, nor would nearby residents be displaced as part of the project. Also, no businesses or employees would be displaced by the project. No impact related to housing, household, tenant, employee, or business displacement would occur.

4.13.3 Mitigation Measures

No adverse impacts related to population or housing would occur; therefore, no mitigation is required.

4.13.4 Comparison of Impacts with Park to Playa Trail IS/MND

No adverse impact related to population or housing would occur with implementation of Segment C. This finding is similar to the analysis in the previous IS/MND for the Park to Playa Trail.

4.14 PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

4.14.1 Environmental Setting

Fire Protection Services

The Los Angeles County Fire Department, the Los Angeles City Fire Department, and the Culver City Fire Department provide fire protection services in the project area through a Mutual Aid Agreement. The nearest fire station is the Culver City Fire Department Headquarters, located at 9600 Culver Boulevard, approximately 0.9 mile west of the site. This station has one fire engine, one rescue engine, a battalion chief vehicle and reserve, a utility engine, a strike team lookout vehicle, three reserve engines, and a reserve truck engine (Culver City 2015).

Police Protection Services

The Los Angeles County Sheriff's Department, the Los Angeles City Police Department (LAPD), and the Culver City Police Department provide law enforcement and police protection services in the project area. The KHSRA is subject to patrol by the County Sherriff's Department, with security at the Baldwin Hills Scenic Overlook provided by State Rangers. Culver City Park and Segment C are patrolled by the Culver City Police Department.

The Culver City Police Department is located at 4040 Duquesne Avenue, approximately 0.9 mile west of the site. This Department has 105 sworn officers, 21 reserve officers, and 50 professional staff (CCPD 2011). The Los Angeles County Sheriff's Department has a Sheriff's station at West Los Angeles College (0.9 mile southwest of the site) and primarily serves the college campus. The City of Los Angeles' Southwest Community Police Station serves the Baldwin Hills area from its station at 1546 West Martin Luther King Jr. Boulevard (LAPD 2015). The Marina Del Rey Sheriff's Station is the nearest Sheriff's station located 4.8 miles southwest of the site, at 13851 Fiji Way in Marina Del Rey (LASD 2015).

School Services

The City of Culver City, including the site, is served by the Culver City Unified School District. The site is within the service boundaries of Farragut Elementary School, Culver City Middle School, and Culver City High School (CCUSD 2015a). The nearest school to the site is The Willows Community School, a private school open to students in grades kindergarten through 8 (The Willows Community School 2015). West Los Angeles College, located on 9000 Overland Avenue, is a community college located 0.6 mile southwest of the site.

Libraries

The nearest library to the site is the Culver City Julian Dixon Library located at 4975 Overland Avenue in Culver City (1.05 miles to the southwest). This library is currently closed for renovations and is scheduled to reopen in early 2016 (County of Los Angeles Public Library 2015). The second nearest library is the City of Los Angeles' Baldwin Hills Library located at 2906 La Brea Avenue (approximately 1.5 miles to the northeast) (Los Angeles Public Library 2015).

4.14.2 Impact Analysis

a)(i) Less than Significant Impact

Segment C improvements would be limited to a compacted soil path, steps with railings, an interpretive node, an elevated boardwalk, and a pedestrian bridge. The proposed project would not involve the construction of habitable structures, nor would the project lead to a permanent resident population at or near Segment C. The proposed trail improvements would not be built with or utilize flammable, combustible, or explosive materials. Therefore, limited demand for fire protection services would be generated by the trail improvements. However, short-term construction activities, use of the trail in the long term, and periodic maintenance activities would have the potential for fire and would generate demands for fire protection services. As stated under RR 4.8-4 in Section 4.8, Hazards and Hazardous Materials, the contractor would need to obtain a permit from the County, which would prescribe restrictions and precautions that would need to be implemented to prevent wildfire along the trail. Also, RR 4.8-5 requires that signs be provided along the trail to identify wildfire hazards and prohibited activities, as per City of Los Angeles regulations. Compliance with these RRs would reduce the potential for wildfire and the ensuing need for fire protection services. Thus, no new or physically altered fire protection facilities would be required to provide fire protection services to users of the proposed trail and the trail improvements. Impacts would be less than significant.

a)(ii) Less than Significant Impact

The proposed project would not involve the construction of habitable structures, nor would the project lead to a permanent resident population at or near Segment C. While trail users would only be using Segment C for a few minutes or a few hours at a time, an increase in demand for police protection services would occur due to the potential for property crimes such as theft, vandalism, and graffiti on the trail improvements and the potential for personal crimes due to the presence of trail users on Segment C and the potential increase in trail users at other trails connected to Segment C.

Fences would be provided on both sides of the trail to prevent trespassing into the oil and gas production activities to the south and the residential uses to the north. The gate from the future Stoneview Nature Center to the trail would be locked when the nature center is closed from dusk to dawn daily. Use of Segment C and the pedestrian bridge would also be prohibited from dusk

until dawn through closures of the Baldwin Hills Scenic Overlook and the KHSRA and gates at the KHSRA pedestrian bridge landing and at the Stoneview Nature Center.

While the Culver City Police Department is responsible for monitoring and enforcing the Culver City regulations on the use of city parks, Segment C would be managed by the County. Therefore, County regulations would apply.

The County Sheriff's Department would provide police protection and law enforcement services to Segment C and would enforce County regulations on the use of the trail, parks, and adjacent public areas in the unincorporated County areas and under County management (RR 4.14-1). In addition, there are regulations related to permitted activities in State parks that are enforced by the State Rangers at the Baldwin Hills Scenic Overlook (RR 4.14-3).

While Chapter 6 Article 3 of the Los Angeles City Municipal Code outlines regulations for parks, playgrounds, beaches and other property, the portion of the KHSRA located in the City is under the management of the County and is patrolled by the County Sheriff's Department. Therefore, County regulations would also apply to the pedestrian bridge proposed at the Los Angeles City portion of the KHSRA. Compliance with State and County regulations by trail users and law enforcement by the State Rangers and the County Sheriff's Department would reduce the incidence of crime along Segment C and its associated impacts on police protection services.

Thus, no new or physically altered police protection facilities would be required to provide police protection services to the proposed trail and trail improvements. Impacts would be less than significant.

a)(iii–v) No Impact

The proposed trail improvements for Segment C would not lead to an increase in the resident population or housing stock of the area. Therefore, no demand for schools, libraries, parks, or other public facilities would be generated by the project. The project is also not expected to have any direct impacts on nearby schools (such as The Willows Community School and West Los Angeles College), libraries, or other public facilities.

The demand for maintenance activities at Segment C would not require new or expanded public facilities since the proposed trail would represent a minor segment of existing trails in the Baldwin Hills area and the area of the KHSRA that are subject to ongoing maintenance by the Los Angeles County Department of Parks and Recreation. Also, there are existing maintenance programs, crews, and facilities at the KHSRA that would be used to maintain Segment C. No new public facilities would be required and there would be no adverse impact.

Segment C would promote greater use of existing trails, parks, and recreational facilities by area residents and other people in the surrounding communities and in the region. It could also lead to greater use of the Stoneview Nature Center that is currently under construction. Increased use of parks and recreational facilities is addressed under Section 4.15, Recreation, below.

4.14.3 Regulatory Requirements

RR 4.14-1 Trail users shall comply with Title 17, Parks, Beaches and Other Public Areas, of the Los Angeles County Code, which outlines the activity restrictions and regulations at parks and public areas. These regulations include hours of operation, prohibited activities, use and access restrictions, and fines and penalties.

The design-build contractor shall post signs along the trail to inform the public of allowable uses and activity restrictions, with the signs shown on project plans that would be subject to review and approval by the County. The County Sheriff's Department shall be responsible for monitoring and enforcing these regulations on Segment C.

RR 4.14-2 Trail users and the construction crew shall comply with Title 14, Division 3 of the *California Code of Regulations,* which contains regulations related to the use of park facilities, litter, plants and animals, fire, smoking, weapons and traps, fireworks, noise, solicitation, and other activities allowed or prohibited in State parks.

The design-build contractor shall be responsible for compliance by the construction crew and the State Ranger shall be responsible for monitoring and enforcing these regulations at the Baldwin Hills Scenic Overlook.

From Section 4.8, Hazards and Hazardous Materials

RR 4.8-4 As stated in Chapter 326 in Title 32 of the Los Angeles County Code, the Contractor shall obtain a permit from the County for all construction and maintenance activities in hazardous fire areas. The Contractor shall then comply with the provisions of the permit, including the availability of fire protection equipment; an adequate water supply; creation of fire breaks, installation of warning signs; brush removal; adequate emergency access; fencing; and the use of equipment and machinery with spark arresters.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with this regulation during construction and maintenance activities on Segment C.

RR 4.8-5 As stated in Division 25 of Article 7 of Chapter 5 of the Los Angeles City Municipal Code, signs shall be posted along Segment C, which outline prohibitions on open burning, smoking, flaming or glowing objects, and open flames.

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval). The contractor shall include the required signs in the project plans; shall install the required signs; and shall comply with these regulations during construction and maintenance activities on Segment C.

4.14.4 Mitigation Measures

With compliance with existing regulations, the proposed trail and trail improvements would not result in significant adverse impacts related to public services; therefore, no mitigation is required.

4.14.5 Comparison of Impacts with Park to Playa Trail IS/MND

No adverse impact related to public services would occur with compliance with RR 4.14-1 and RR 4.14-2. Impacts of Segment C on public services would be similar to the impacts of the Park to Playa Trail, as discussed in the previous IS/MND.

4.15 RECREATION	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

4.15.1 Environmental Setting

Existing Recreational Facilities

The site for Segment C is undeveloped land at the northern end of the Inglewood oilfield. The eastern and southern sections of the site are fenced off and are not used for recreation. The western portion of the site is a detention basin that is accessible from the Baldwin Hills Scenic Overlook and is informally and occasionally used by some hikers.

The Baldwin Hills Scenic Overlook (Segment B) is a State park located northwest of the site and is developed with a stairway from Jefferson Boulevard to the top of the hill, a visitor center, several trails, a trailhead, a picnic area, an observation deck, and a parking area. A trail connects the Baldwin Hills Scenic Overlook to Culver City Park to the south.

The Culver City Park (Segment A) is a 41.55-acre City park located on Jefferson Boulevard, west of Segment C. It is developed with three softball diamonds, a baseball field, a skate park, picnic areas, a dog park, basketball courts, a children's playground, a boardwalk, and trails.

The Blair Hills Park is a Culver City park located at 5950 Wrightcrest Drive, north of the site. It is a 1.62-acre neighborhood park with a barbeque grill, children play equipment, softball diamond, basketball court and a grass area.

The Los Angeles County Department of Public Works is currently constructing the Stoneview Nature Center on an approximately 5.0-acre former school site on Stoneview Drive, north of the site for Segment C. The center will include a 4,000-square-foot building, gardens, trails, observation area, yoga deck, seating areas, exercise areas, and a parking lot. Construction is anticipated to be completed in May 2016 and the center would be operational by Summer 2016 (Feldhaus 2015). The County estimates that 1,050 visitors would use the center each week, based on 2012 attendance records at other County natural area parks (LACDPW 2013).

The KHSRA is an approximate 387-acre State-owned, County-operated regional park located east of La Cienega Boulevard. It is developed with four playgrounds, two lighted baseball diamonds, a sand volleyball court, a half basketball court, a fishing lake, a waterfall, a Japanese Garden, the Olympic Forest, open fields, meeting rooms, picnic shelters, barbecue pits, shade structures, playgrounds, several formal and informal trails, parking areas, and restrooms. The KHSRA has been estimated to have as many as 20,000 visitors during summer weekends, which include park visitors, trail users, special event attendees, group picnics and gatherings, school

groups, and youth campers. Segments D through H of the Park to Playa Trail are located in the KHSRA.

Aside from these parks/recreational facilities, there are several other parks and recreational facilities in the project area that offer a wide range of recreational opportunities. In Culver City the Ballona Creek Bike Path (west of Jefferson Boulevard and the site) is a Class I bikeway that runs from Syd Kronenthal Park in Culver City to the Marvin Braude Bike Path along Santa Monica Beach and the South Bay area.

The Stocker Corridor Trail (Segment I) is a trail in the open space setback area on the south-southeast side of Stocker Street that serves hikers, joggers, and bicyclists. Its western end is near the KHSRA, the Ruben Ingold Park, and the Norman O. Houston Park. The Ruben Ingold Park is a County park developed with a pedestrian path/track loop, benches, and exercise equipment at the top of Windsor Hills and south of the Stocker Corridor Trail. The Norman O. Houston Park is a City of Los Angeles park developed with a loop trail, open fields, basketball courts, a playground, parking lot, and outdoor fitness equipment. It is located east of the KHSRA and north of the Stocker Corridor Trail.

The Jim Guillam Park is a City of Los Angeles park that has tennis courts, basketball courts, a baseball field, picnic areas, and a tot lot; it is located northeast of the KHSRA. The Ladera Ball Field is a 31-acre area developed with three baseball diamonds located south of the Baldwin Hills; it is owned and managed by the Los Angeles County Department of Parks and Recreation.

Recreational Plans

The Baldwin Hills Park Master Plan provides an overall vision for the expansion and improvement of open space and recreational areas in the Baldwin Hills, including improved park connections. The Master Plan calls for the protection of natural habitat areas; the improvement and expansion of active and passive recreational areas; the creation of footpaths and bike trails; the provision of buffers between urban development and open space; and the preservation of steep slopes, ridgelines, and vista points. With full implementation of the Master Plan, it is anticipated that a 1,400-acre urban park would be created at Baldwin Hills (CDPR 2002a).

The KHSRA General Plan Amendment outlines the State's goals and policies for future development and management of the KHSRA, the Baldwin Hills Scenic Overlook, and the Blair Hills Corridor parcels, as well as for improving pedestrian and vehicle access to these park facilities. It promotes greater use of the KHSRA and other nearby parks, while at the same time protecting the area's natural and cultural resources.

The City of Los Angeles 2010 Bicycle Plan, Culver City Bicycle and Pedestrian Master Plan, and County of Los Angeles Bicycle Master Plan promote the use of bicycles by identifying bike routes, bike lanes, and bicycle-friendly streets in the Cities of Los Angeles and Culver City and in the County. These plans call for the development of a comprehensive bicycle network in the County (City of Los Angeles 2011; Culver City 2010; County of Los Angeles 2012a). No bikeways or bike lanes are proposed along La Cienega Boulevard near the site.

4.15.2 Impact Analysis

a) Less than Significant Impact

The proposed project would not lead to an increase in the area's permanent population or housing stock, either directly or indirectly. Therefore, no demand for parks and recreational facilities would

be generated by the project. Rather, the project would improve recreational facilities in the Blair Hills and Baldwin Hills areas and meet the demand for improved trail facilities in the area.

The project would expand recreational facilities in the Blair Hills area by connecting the KHSRA to the Baldwin Hills Scenic Overlook. The existing trail in Segment G (within the KHSRA) would connect to the proposed Segment C trail.

With Segment C connecting existing trails in the area, trail users are expected to utilize the Park to Playa Trail for greater distances (due to improved connections and enhanced trail use experience), as well as potentially increase the use of the Ballona Creek Bike Path (since a more convenient connection between the Park to Playa Trail and the Ballona Creek Bike Path would be provided).

Although the Park to Playa Trail is expected to be mainly used by existing users of the existing trails in Baldwin Hills, it is being developed to serve as a regional trail system, where users would come from throughout the region to utilize the (longer and more challenging) Park to Playa Trail to and from the Ballona Creek Bike Path. Therefore, some of the existing and future users of the Ballona Creek Bike Path are also expected to use the Park to Playa Trail, including Segment C, due to the connection that would be provided to this bike path.

With the completion of Segment C, the number of weekend and weekday trail users in the area is expected to increase over time, although estimates are difficult to develop because hiking, biking, walking, and trail uses are highly variable between segments, time of day, and day of the week depending on the type/purpose of use (i.e., long-distance hiking/running, recreational biking or bike training, exercise jog/walk, dog walk, leisure walk, training, wildlife viewing, educational visit, photography, meditation, roller blading, or as a secondary activity of park visitors).

Trail use of the project may increase the use of other recreational facilities at Culver City Park, the Baldwin Hills Scenic Overlook, the KHSRA, and the future Stoneview Nature Center, but this increase would not translate to a measurable demand for other local or regional trails, parks or park amenities, or for other recreational facilities that may lead to the physical deterioration of these facilities. It is more likely that park visitors would be using the adjacent trails as an incidental activity to their use of the park facilities; trail users would use the adjacent recreational facilities at the start of their trail use; or trail users would make a short stop at these park facilities in the middle of their trail use. Therefore, use of adjacent park amenities and recreational facilities would only be for short periods, and no substantial deterioration of nearby recreational facilities would occur. Impacts would be less than significant.

b) Less than Significant Impact

Segment C would be a new trail along the Park to Playa Trail, connecting public parks and open spaces and undeveloped land in the Baldwin Hills area. An increase in the land area that may be considered in recreational use would occur with the project.

During construction of the trail, portions of the KHSRA and Baldwin Hills Scenic Overlook would not be available for public use. However, existing trails and recreational facilities would remain available for public use.

In the long term, the project would provide improved trail access and encourage greater use of the trails and adjacent parks, recreational facilities, and open space. This would be consistent with the main goals of the Baldwin Hills Park Master Plan and the KHSRA General Plan Amendment. The project would have beneficial impacts on recreation, while short-term impacts

of project construction in terms of biological resources, cultural resources, hazards and hazardous materials, and noise, as analyzed in this IS/MND, would be less than significant after mitigation.

4.15.3 Mitigation Measures

The project is a beneficial use for recreation. No significant adverse impacts related to recreation would occur; therefore, no mitigation is required.

4.15.4 Comparison of Impacts with Park to Playa Trail IS/MND

No adverse impact related to recreation would occur with implementation of Segment C. This is similar to the impacts of the Park to Playa Trail, as discussed in the previous IS/MND.

4.16 TRANSPORTATION/TRAFFIC	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system. Including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☒	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decreased the performance or safety of such facilities?	☐	☐	☐	☒

4.16.1 Environmental Setting

Roadway Network

Regional access to the project area is provided by the Santa Monica/Rosa Parks Freeway (Interstate [I] 10), which connects the City of Santa Monica on the west, through the Los Angeles downtown area, to San Bernardino County and areas farther east. This freeway has 10 travel lanes and runs in a general east-west direction, approximately 1.5 miles north of the site. I-10 carried approximately 19,100 vehicles during the peak hours and 271,000 vehicles per day in 2014 between La Brea Avenue and Venice Boulevard (Caltrans 2015). Near the site, ramps to the I-10 are located on La Cienega Boulevard, Fairfax Avenue, and Venice Boulevard.

The local roadway network in the project area consists of the following streets:

- Jefferson Boulevard has four lanes and generally runs north-south at the western edge of the Blair Hills and connects to National Boulevard farther north, where it then turns east. Duquesne Avenue intersects with Jefferson Boulevard and provides direct access to Culver City Park. Hetzler Road extends from Jefferson Boulevard into the Baldwin Hills Scenic Overlook (Segment B). The section of Jefferson Boulevard near Baldwin Hills is

located in the City of Culver City. Culver City estimated daily traffic volumes on this roadway at 29,470 vehicles per day in 2004 (Culver City 2015f).

- Rodeo Road is a four-lane east-west arterial that intersects with Jefferson Boulevard, La Cienega Boulevard, and La Brea Avenue to the north of Segment C. It is located in the City of Los Angeles. In 2010, Rodeo Road carried approximately 3,353 vehicles during the morning (AM) peak hour and 3,185 vehicles during the afternoon (PM) peak hour (SCAG 2010).
- La Cienega Boulevard is a five- to six-lane major arterial that cuts north-south through the western section of the Baldwin Hills, east of Segment C. It has on- and off-ramps to a bridge that serves as the KHSRA entrance. The section of La Cienega Boulevard 200 feet south of the bridge is located in the County of Los Angeles, but the section from 200 feet south of the bridge to the north is at the boundary between the City of Los Angeles (to the east) and the City of Culver City (to the west).

  Culver City estimated 2004 traffic volumes north of Wrightcrest Avenue at 69,141 vehicles per day (Culver City 2015f). In 2010, La Cienega Boulevard carried approximately 5,629 to 6,803 vehicles during the AM peak hour and 5,653 to 6,774 vehicles during the PM peak hour between Stocker Street and Rodeo Road. The intersection of Rodeo Road with La Cienega Boulevard operated at Level of Service (LOS)[14] F during both the AM and PM peak hours in 2010 (SCAG 2010).
- Stocker Street is a four-lane arterial with a raised median that extends east from La Cienega Boulevard to La Brea Avenue and then veers to the northeast toward Crenshaw Boulevard. La Brea Avenue, Stocker Street, and Overhill Drive intersect to create a five-point intersection at the southeastern end of the KHSRA. From La Brea Avenue, Stocker Street serves as the boundary between the City of Los Angeles (to the north and northwest) and the unincorporated area of the County of Los Angeles (to the south and southeast).

  In 2010, Stocker Street carried approximately 2,251 vehicles during the AM peak hour and 2,170 vehicles during the PM peak hour east of La Cienega Boulevard. The intersection of Stocker Street with La Cienega Boulevard operated at LOS E during both the AM and PM peak hours in 2010 (SCAG 2010).

Congestion Management Program

The Los Angeles County Congestion Management Program (CMP) was developed by the Metropolitan Transportation Authority (Metro) to link transportation, land use, and air quality decisions in the County and to address the impact of local growth on the regional transportation system. Local jurisdictions are required to monitor the CMP highway and transit system; implement a transportation demand management ordinance; implement a program to analyze the impacts of local land use decisions on the regional transportation system; and participate in the Countywide Deficiency Plan. The nearest CMP-designated highway is La Cienega Boulevard, which runs north-south east of the site. Other nearby CMP highways/freeways include I-10 and Venice Boulevard (Metro 2010).

[14] Level of Service (LOS) refers to the operational conditions at an intersection based on the average number of seconds of delay experienced by vehicles traveling through the intersection, with LOS A representing free flow conditions and LOS F defining forced or breakdown flow.

Public Transit

The Metro Light Rail Expo line runs in a westerly direction from downtown Los Angeles to Culver City, with stations at La Cienega Boulevard/Jefferson Boulevard and La Brea Avenue/Exposition Boulevard (Metro 2015). These stations are located 0.8 and 1.25 miles from the site, respectively.

Metro buses and Culver CityBus serve the project area (Metro 2015). Metro Bus Route 217 runs along La Cienega Boulevard, with a bus stop at La Cienega Boulevard and Rodeo Road. CityBus 4 runs on Jefferson Boulevard from the Westfield Culver City Mall to the West Los Angeles College, Expo Light Rail Station on La Cienega Boulevard, and the West Los Angeles Transit Center. It has a stop near Culver City Park, west of the site. CityBus 5 runs from Venice High School to Culver City schools, Culver City Hall (along Washington Boulevard and Braddock Drive), and the Blair Hills area, with stops at Lenawee Avenue and Wrightcrest Drive and near Blair Hills Park (at Wrightcrest Drive and Stoneview Drive) (Culver City 2015d).

Bikeways

The Culver City Bicycle and Pedestrian Master Plan promotes walking and bicycle use in the City through the creation of an extensive bikeway network, including the existing Ballona Creek Bike Path; a shared roadway bicycle marking on Jefferson Boulevard south of and along Culver City Park; a bike lane on Jefferson Boulevard north of Culver City Park; a shared roadway bicycle marking on Duquesne Avenue; and a bicycle-friendly street on Wrightcrest Drive (from Blair Hills Park) and north on Lenawee Avenue. The Master Plan also proposes a pedestrian corridor on Jefferson Boulevard and Duquesne Avenue (Culver City 2010). The bike lane, sidewalks, traffic signal, crosswalks, and curb extensions at or near the entrance to the Baldwin Hills Scenic Overlook were completed in January 2013 (Culver City 2015e).

The City of Los Angeles' 2010 Bicycle Plan shows the Expo Line Bike Path along Exposition Boulevard, north of the site and Bicycle Friendly Streets on Rodeo Road, Clyde Avenue, Hauser Boulevard, and Coliseum Street north of the site.

As stated earlier, a survey of trail users indicates that most users drive to the trails (78 percent); some users use the bicycle (30 percent); some walk to the trails (25 percent); and others use public transit (3 percent) (Alta 2011).

4.16.2 Impact Analysis

a) Less Than Significant Impact with Mitigation

Construction Traffic

The project would generate short-term vehicle trips to and from Segment C as trail improvements are under construction. These trips would include worker commutes; construction equipment and materials transport; import of fill soils; and/or export of excavated soils. These vehicle trips would add to existing traffic volumes on local and regional roadways. Apart from the initial transport of construction equipment and materials, relatively minor construction-related traffic would occur. Because of the small scale of the proposed trail improvements, construction-related daily trips associated with worker commutes, equipment and materials transport, and haul truck trips would be relatively low.

Construction staging would occur at the Baldwin Hills Scenic Overlook, the KHSRA, and BHRCA property. Construction would not result in a lack of access to adjacent developments since existing land uses face back from Segment C. Construction of the pedestrian bridge may

encroach into the public right-of-way of La Cienega Boulevard. The partial closure of this street would add to existing traffic congestion, although this impact would be temporary. The project would need to comply with the Standard Specifications for Public Works Construction (Greenbook) and the County's Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook). The Greenbook and Graybook contain standards for traffic and access (i.e., maintenance of access; traffic control; and notification of emergency personnel) and set guidelines for the provision of traffic warning signs, flag persons, and other measures to maintain access to all properties and to facilitate traffic flow during construction activities on or near public rights-of-way. Compliance with the Greenbook and Graybook, as specified in RR 4.16-1, would reduce construction traffic impacts.

However, intersections on La Cienega Boulevard currently operate at LOS E and F during the AM and PM peak hours. Thus, any temporary or partial closure of lanes on La Cienega Boulevard would further degrade traffic operations. Under MM 4.16-1, any temporary and/or partial closure of travel lanes on La Cienega Boulevard shall be scheduled outside the daytime hours (including AM and PM peak hours) to prevent significant adverse impacts to traffic. This would confine any potential lane closures on LA Cienega Boulevard to nighttime hours (9 PM to 6 AM of the following day), when there are fewer vehicles. Construction traffic impacts would be reduced to less than significant levels after mitigation.

Operational Traffic

The majority of trail users would be driving to and from the proposed trail as they do now for the use of existing nearby trails, which occurs mainly during the weekends or late afternoon/early evening hours. Implementation of the project is not anticipated to result in a substantive increase in vehicle trips during the AM and PM peak hours. Rather, most of the new vehicle trips to and from Segment C are expected to occur before or after peak hours or on weekends, as occurs in the existing condition.

While the Baldwin Hills Park Master Plan and the KHSRA General Plan Amendment both envision a large urban park that would serve as a regional destination and recreational facility, the proposed trail is not anticipated to become a major factor in the increase in the number of users of existing trails or of visitors to the KHSRA and adjacent parks. Also, the proposed trail would promote bicycle use and walking/hiking and may increase the number of vehicles coming to and from the KHSRA and adjacent areas. However, since these trips would be recreational in purpose (occurring mainly on weekends and/or outside peak hour traffic), they would have no direct effect on worker commute trips during the AM and PM peak hours on weekdays. In addition, trail use would not be confined to Segment C, but would likely include the use of connecting trails. Thus, vehicle trips would not be concentrated on any one street but would be scattered among all the different streets that provide access to existing trails and recreational facilities. This would include Jefferson Boulevard, La Cienega Boulevard, Duquesne Avenue, La Brea Avenue, Stocker Street, Overhill Drive, Presidio Drive, Valley Ridge Avenue, Mount Vernon Drive, Don Lorenzo Drive, Cloverdale Avenue, and Hetzler Road.

Maintenance activities for Segment C would be provided by the County, as part of KHSRA maintenance activities. This maintenance is not expected to create a major increase in vehicle trips to the area. Rather, the on-site maintenance crew at the KHSRA would have to go to Segment C as an added maintenance responsibility. But these trips would represent a small percentage of existing maintenance trips at the KHSRA and would not occur during peak hours. Thus, it would not result in substantial traffic congestion.

Traffic increases due to the increase in trail users coming to and from the proposed trail would be incremental over time and trips for maintenance activities would be minimal. Long-term impacts would be less than significant.

b) Less than Significant Impact

The nearest CMP-designated highway is La Cienega Boulevard. The proposed trail would include a pedestrian bridge crossing over La Cienega Boulevard. However, it does not include alterations to the travel lanes on La Cienega Boulevard. Therefore, trail use would not have any impact on the LOS on either La Cienega Boulevard or the other CMP highways located farther from the trail. Impacts associated with vehicle trips coming to use Segment C are expected to be incremental over time and minimal during the peak hours, as discussed above.

The LOS standard in Los Angeles County is set by the CMP at LOS E, except where base year LOS is worse than E. The project would not generate 50 or more trips during either the AM or PM weekday peak hours on CMP highways or 150 or more trips on mainline freeways during the AM or PM weekday peak hours, since most trail users would likely use the trail outside weekday peak hours. Therefore, the project would not change the LOS on La Cienega Boulevard, and a Traffic Impact Analysis per the CMP guidelines is not required. Impacts on the CMP highway system would be less than significant**.**

c) No Impact

The site is not located within the boundaries of an airport land use plan or within 2.0 miles of an airport. The nearest airport is the Santa Monica Municipal Airport located 3.6 miles from the site. The proposed trail would not generate air traffic or require air transportation. The proposed pedestrian bridge would not be higher than the heights of existing trees in the KHSRA or the ridgelines of the adjacent hills. Therefore, the project would not affect or change air traffic levels at the Santa Monica Municipal Airport and would not create safety risks or obstructions to air navigation. No impact would occur.

d) Less than Significant Impact

The proposed trail would be fenced on both sides to prevent access to the adjacent oilfield and residences. The trail would also be constructed in compliance with ADA standards. Gates to the trail would be closed from dusk to dawn to prevent nighttime use. No hazards on the trail would be created. The proposed pedestrian bridge may pose a limitation to the height of vehicles passing underneath the bridge, and consequently present safety hazards to vehicles on La Cienega Boulevard and trail users on the bridge. The Federal Highway Administration (FHWA) sets the minimum vertical clearance for freeways and arterial roadways to be 14 to 16 feet, with 17 feet for sign trusses and pedestrian overpasses (FHWA 2014). In order to avoid traffic hazards to vehicles on La Cienega Boulevard, the project would need to comply with RR 4.16-3. The pedestrian bridge is proposed to have a vertical clearance of 18.5 feet and no columns are proposed within the right-of-way of La Cienega Boulevard. This will avoid safety hazards to passing vehicles.

The project would encourage the use of trails in the Baldwin Hills area through connection of existing trails to the east and west of Segment C. Increased use of area trails would lead to a larger number of individuals crossing roadways; using roadway sidewalks; and using the shoulders of internal roads at the KHSRA, Baldwin Hills Scenic Overlook, and Culver City Park. Therefore, a higher potential for conflict between vehicles and trail users could occur. Crosswalks, sidewalks, and trail crossings on public rights-of-way would be signed and improved in accordance with the California Manual on Uniform Traffic Control Devices (MUTCD), as specified

in RR 4.16-2. The California MUTCD adopts uniform standards and specifications for traffic control devices, including all signs, signals, markings, and other devices used to regulate, warn, or guide traffic on streets or highways, pedestrian walkways, and bikeways. The standards include temporary traffic controls during construction; traffic controls for school areas; and traffic controls for highway-rail/light rail transit grade crossings. In addition, warning and traffic safety signs would be provided along the proposed trail to promote safety for trail users. Therefore, a substantial increase in traffic hazards to trail users would not be created by the Project. Impacts would be less than significant.

Driving hazards associated with flash blindness due to glare from the pedestrian bridge finishes is discussed in Section 4.1, Aesthetics.

e) Less than Significant Impact with Mitigation

La Cienega Boulevard, Rodeo Road, and La Brea Avenue are identified as Selected Disaster Routes in the City of Los Angeles General Plan Safety Element (City of Los Angeles 1996).

The proposed trail would not be located on a public roadway, except for a pedestrian bridge that would cross over La Cienega Boulevard. Use of the pedestrian bridge is not expected to affect emergency evacuation due to the limited number of trail users at any one time on the bridge. Trail use would also not affect emergency response to the project area since Segment C would not be located on streets used by emergency vehicles or for emergency evacuation. Rather, Segment C could serve as a minor evacuation route during emergencies for the Baldwin Hills Scenic Overlook, the KHSRA and the proposed Stoneview Nature Center. The project would not adversely affect emergency response and evacuation.

Construction on La Cienega Boulevard may lead to the temporary and partial closure of travel lanes on this road. Due to heavy traffic volumes during the peak hours, the temporary or partial closure of La Cienega Boulevard during peak hours could affect emergency response through the area. As discussed above, any travel lane closure or obstruction shall be scheduled during nighttime hours (MM 4.16-1) to avoid further degradation of LOS on La Cienega Boulevard during peak hours. The project would also implement RRs 4.16-1 and 4.16-2 to provide appropriate traffic control devices during construction and maintain traffic flows and access to all developments. Also, required notification of emergency personnel during the construction phase would allow the use of alternative routes to emergencies or for evacuation. Therefore, impacts to emergency access would be less than significant after mitigation.

f) No Impact

As discussed above, the project would not conflict with the Los Angeles County CMP. Also, the project would complement the City of Los Angeles' 2010 Bicycle Plan and the Culver City Bicycle and Pedestrian Master Plan since it would allow bicycle use on the proposed trail and would promote bicycle use.

The increase in public transit users due to trail use of Segment C is not expected to be significant and would not occur during the peak hours since it is assumed that only three percent of trail users would utilize public transportation systems, as currently existing. Also, the project is intended to benefit pedestrians, hikers, walkers, joggers, bicyclists and trail users, thereby promoting the use of alternative transportation. Therefore, no adverse impacts on alternative transportation systems or conflicts with alternative transportation policies, plans, or programs would occur.

4.16.3 Regulatory Requirements

RR 4.16-1 In accordance with the Cities of Los Angeles and Culver City and the County of Los Angeles' general construction requirements, temporary traffic control measures shall be implemented in accordance with the Standard Specifications for Public Works Construction (Greenbook) and the County's Additions and Amendments to the Standard Specifications for Public Works Construction (Graybook), which contain standards for maintenance of access; traffic control; and notification of emergency personnel.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process). During construction activities, the contractor shall provide temporary traffic control measures in accordance with the Greenbook and Graybook.

RR 4.16-2 Trail improvements on public rights-of-way shall include the provision of traffic control devices in compliance with the Manual for Uniform Traffic Control Devices (MUTCD) to ensure traffic safety on streets and highways. The MUTCD includes standards for signs, markings, and traffic control devices needed to promote pedestrian and vehicle safety and traffic efficiency.

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval during the plan check process). The contractor shall design and construct all improvements on public roadways in accordance with the MUTCD.

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

The design-build contractor shall include this RR in the Engineering Plans and in the Contractor Specifications (which shall be subject to County approval during the plan check process) and shall design and build the pedestrian bridge in compliance with this guideline.

4.16.4 Mitigation Measures

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

The design-build contractor shall include this MM in the Contractor Specifications (which shall be subject to County approval during the plan check process), and the contractor shall comply with this regulation during construction activities for Segment C.

4.16.5 Comparison of Impacts with Park to Playa Trail IS/MND

No significant adverse impact related to transportation would occur with compliance with RR 4.16-1 through RR 4.16-3 and implementation of MM 4.16-1.

The impacts of Segment C on transportation and traffic would be greater than the impacts of the Park to Playa Trail (as discussed in the previous IS/MND) due to the proposed pedestrian bridge

over La Cienega Boulevard. Compliance with RR 4.16-3 and implementation of MM 4.16-1 would reduce these impacts to less than significant levels.

4.17 UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

4.17.1 Environmental Setting

Water Service

Water service in the KHSRA is provided by the City of Los Angeles Department of Water and Power (LADWP). The LADWP provided approximately 550,000 acre-feet of water to customers in 2010 (LADWP 2011). The Golden State Water Company (GSWC), which serves the City of Culver City and the Baldwin Hills Scenic Overlook, provided 5,024 acre-feet of water to its Culver City service area in 2010 (GSWC 2011).

Sewer Service

Sewer service in the project area is provided by the Los Angeles City Bureau of Sanitation (which serves the Cities of Los Angeles and Culver City and the KHSRA). Wastewater from the Los Angeles City Bureau of Sanitation system and from Culver City is treated at the Hyperion Treatment Plant, which is located at 12000 Vista del Mar in Playa del Rey, 6.9 miles southwest of the site. The capacity of the Hyperion Treatment Plant is 450 million gallons per day (mgd), with an average wastewater flow of 362 mgd (City of Los Angeles 2015a). Main sewer pipelines (i.e., North Outfall Sewer, East Central Interceptor Sewer, Central Outfall Sewer, and North Outfall Replacement Sewer) are located in Jefferson Boulevard, La Cienega Boulevard, and Rodeo Road

and pass though the Baldwin Hills Scenic Overlook, Culver City Park, the site, and areas farther southwest toward the Hyperion Treatment Plant.

There are no recycled water lines near the site (City of Los Angeles 2006).

Storm Drainage

An underground storm drain line from the KHSRA crosses La Cienega Boulevard, with storm water flowing through an open ditch at the eastern end of the site and into the underground line on Lenawee Avenue, which connects to Ballona Creek to the northwest. Storm water runoff at the site generally percolates into the ground and the retention basin at the western section, with runoff flowing north into lower areas as sheet flow; toward drainage lines at Blair Hills Park; and near La Cienega Boulevard towards lines in Lenawee Avenue and Jefferson Boulevard. Storm water in the surrounding area is conveyed into storm drain pipes for discharge into the Ballona Creek Channel, which flows southwesterly into the Pacific Ocean.

Solid Waste Disposal

Solid waste collection services in the City of Culver City are provided by the City's Sanitation Division, with solid wastes brought to the Chiquita Canyon Landfill and Southeast Resource Recovery Facility (SERRF). The Chiquita Canyon Landfill is a privately owned landfill located at 29201 Henry Mayo Drive in Castaic. It is permitted to accept 6,000 tons of wastes per day and has a permitted capacity of 63.9 million cubic yards. In 2010, it had a remaining capacity of 22.4 million cubic yards (CalRecycle 2015a).

The Los Angeles County Sanitation District (LACSD) and the City of Long Beach operate the SERRF at 120 Pier Avenue in Long Beach. This facility is permitted to accept 2,240 tons of wastes per day, which are converted to energy (CalRecycle 2015b). The energy produced is used to operate the facility and the remainder is sold to Southern California Edison (SCE) (LACSD 2015a).

Solid waste collection services within the boundaries of the City of Los Angeles are provided by the Los Angeles City's Bureau of Sanitation for disposal at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is located at 14747 San Fernando Road in Sylmar and covers 1,306 acres. This landfill accepts 12,100 tons of waste per day and, as of October 2012, had a remaining capacity of 96.8 million cubic yards. It is expected to remain in operation until the end of 2037 (CalRecycle 2015c).

The Commerce Refuse-to-Energy Facility, which is located at 5926 Sheila Street in the City of Commerce, accepts commercial and residential refuse at a maximum of 1,000 tons per day and burns the wastes to generate electricity that is sold to SCE (LACSD 2015b).

4.17.2 Impact Analysis

a, e) No Impact

The proposed trail would not generate wastewater since it does not include restroom or kitchen facilities. No sewage generation would be generated by the project. While trail users may use adjacent restroom facilities at public parks in the area, the increase in sewage generation due to increased trail use is anticipated to be minimal. No direct demand for sewer line capacity, wastewater treatment requirements, or wastewater treatment facilities would occur with the project. Therefore, the project would not need new wastewater treatment facilities, and no impact would occur.

b, d) Less than Significant Impact

The project would need water for dust control and cleaning during the construction phase and for irrigation of trees and other landscaping in the long term. Water use for dust control and incidental cleaning during the construction phase would be limited and temporary. Long-term water demand for plant irrigation would be minimal since a relatively small area would be landscaped along the trail and native and drought-tolerant plants would be utilized.

With approximately 12,436 square feet of land to be revegetated with native plants and only trees provided with irrigation through deep well bubblers, long-term water demand from the project is expected to represent a minor amount of the 5,024 acre-feet of water provided by the GSWC to its Culver City service area in 2010.

No new water supplies or treatment facilities would be needed by the project, and impacts would be less than significant.

c) No Impact

The project would introduce impervious surfaces in the form of a pedestrian bridge, steps, sign posts, fence posts, and retaining walls. However, these improvements would be surrounded by open pervious areas that would absorb storm water from these small and/or scattered impervious surfaces. No measurable increase in storm water flows would occur with the project, and no expansion of existing storm drain facilities is needed to serve the trail. The proposed trail in the retention basin would not affect the drainage capacity of this facility since the trail would not be paved but would have a compacted soil surface. The pedestrian bridge will be located over a road and a drainage channel but would not disturb, alter, or directly affect the channel. Therefore, the project would have no impact on storm drain facilities.

f, g) Less than Significant Impact

Construction activities for the proposed trail would generate solid wastes requiring disposal at area landfills. The construction wastes that would be generated by the project would be limited to vegetation debris from site clearing; soil export from excavation and grading; construction wastes from the pedestrian bridge, steps, boardwalk., kiosk, and signs; and excess building materials. This waste generation would be temporary and minimal and would not deplete available capacities at existing landfills.

Since the County would manage the construction of the project, County regulations would apply. The County of Los Angeles' Construction and Demolition Debris Recycling and Reuse Ordinance (Chapter 20.87 of the Los Angeles County Code) requires that at least 50 percent of all construction and demolition (C&D) debris, soil, rock, and gravel removed from a project site be recycled or reused unless a lower percentage is approved by the County of Los Angeles Director of Public Works. The County's Green Building Standards Code (Title 31 of the Los Angeles County Code) was amended in 2013 to require that at least 65 percent of non-hazardous construction and demolition debris be recycled or salvaged.

To reduce the demand for solid waste disposal, the contractor would have to recycle at least 65 percent of construction debris in accordance with County regulations (RR 4.17-1). With this recycling requirement, the project would result in the generation of minor amounts of construction wastes that would require final disposal at area landfills. There are available capacities at the Sunshine Canyon Landfill and the Chiquita Canyon Landfill to dispose of the construction wastes from the project. Construction wastes may also be brought to the SERRF or the Commerce Refuse-to-Energy Facility.

The handling of hazardous wastes and/or contaminated soils shall be made in accordance with existing regulations (RR 4.8-1), as addressed in Section 3.8, Hazards and Hazardous Materials. Since wastes generated during construction of the project would be handled and disposed of in compliance with applicable federal, State, and local statutes and regulations, including the County's construction waste recycling regulations (RR 4.17-1), impacts on landfill capacity would be limited and temporary and considered less than significant. No conflict with solid waste regulations would occur.

Long-term solid waste generation would include organic wastes from maintenance of landscaped areas and from the trash cans along the trail. This would be collected by the County as part of maintenance activities along the trail. The wastes would also be limited and would not result in any significant waste generation that would require additional landfill capacity of conflict with solid waste regulations. Impacts would be less than significant.

4.17.3 Regulatory Requirements

RR 4.17-1 As stated in Title 31, Green Building Standards Code, of the Los Angeles County Code, at least 65 percent of all construction and demolition debris, soil, rock, and gravel removed from a project site shall be recycled or salvaged. In accordance with Chapter 20.87, Construction and Demolition Debris Recycling and Reuse, of the Los Angeles County Code, a Recycling and Reuse Plan (RRP) must be submitted to the County of Los Angeles Department of Public Works, Environmental Programs Division, after an application for a grading or building permit has been filed. The RRP must contain a project description and the estimated total weight of the project's construction and demolition (C&D) debris, with separate estimates for (1) soil, rock, and gravel; (2) other inert materials; and (3) all other project C&D debris.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval during the plan check process), and the contractor shall comply with this regulation during construction activities.

From Section 4.8, Hazards and Hazardous Materials

RR 4.8-1 Construction and maintenance activities for the project shall comply with existing regulations regarding hazardous material use, storage, disposal, and transport so that no major threats to public health and safety are created. These regulations include the Toxic Substance Control Act, Hazardous Material Transportation Act, Resource Conservation and Recovery Act, California Hazardous Waste Control Act, Certified Unified Program Agency, and California Accidental Release Prevention Program.

The design-build contractor shall include this RR in the Contractor Specifications (which shall be subject to County approval). The contractor shall comply with pertinent hazardous material regulations during construction and maintenance activities on Segment C.

4.17.4 Mitigation Measures

With compliance with existing regulations, the project would not result in significant impacts related to utilities or service systems; therefore, no mitigation is required.

4.17.5 Comparison of Impacts with Park to Playa Trail IS/MND

No adverse impact related to utilities would occur with compliance with RR 4.17-1. Impacts would be similar to the impacts of the Park to Playa Trail, as discussed in the previous IS/MND.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

4.18.1 Impact Analysis

a) Less than Significant with Mitigation

As discussed in Section 4.4, Biological Resources, the project would have impacts on sensitive biological resources, including migratory birds, but mitigation has been provided to reduce these impacts to less than significant levels. The project also involves restoration of disturbed areas and landscaping along the trail with native plants. After mitigation, the project would not have the potential to degrade the quality of the environment; would not substantially reduce the habitat of a fish or wildlife species; would not cause a fish or wildlife population to drop below self-sustaining levels; would not threaten to eliminate a plant or animal community; and would not reduce the number or restrict the range of a rare or endangered plants or animals.

As discussed in Section 4.5, Cultural Resources, impacts on human remains would be less than significant with compliance with existing regulations. Impacts on archaeological and paleontological resources would be minimized or avoided through implementation of mitigation measures during grading, excavation, and ground-disturbing activities. Impacts would be less than significant after mitigation. The project would not eliminate important examples of the major periods of California history or prehistory.

Implementation of the mitigation measures for biological and cultural resources and compliance with existing regulations on the disposition of human remains that may be found during excavation and local tree ordinances would result in less than significant impacts.

b) Less than Significant

Aside from the project, a number of other private and public projects are proposed or planned in the area. These include trail improvements within the KHSRA and the Stoneview Nature Center, which is currently under construction. The City of Los Angeles is also planning the improvement

of Norman O. Houston Park, which may include restrooms, a re-circulating splash pad, a shade structure, barbeque pits, parking lot extension, landscaping, a vegetated swale, and refurbishment of the existing jogging path. A walking trail from the parking lot to the corner of La Brea Avenue and Stocker Street may also be implemented. Private developments proposed in the area include a proposed seven-unit condominium complex on Duquesne Avenue, west of the Ballona Creek Bike Path. The environmental impacts of these projects would add to the impacts of Segment C on a cumulative basis.

However, the impacts of the project would be limited in both intensity and scope due to the relatively small size of trail improvements proposed. Since project impacts would be less than significant after mitigation, impacts associated with the project are not expected to result in cumulatively considerable impacts when added to the impacts of other projects planned or proposed in the vicinity of the trail alignment. Cumulative impacts would be less than significant.

c) Less than Significant with Mitigation

Project construction and trail use would not have the potential to generate significant adverse impacts on human beings, either directly or indirectly with the implementation of mitigation measures. Potential impacts related to Air Quality, Hazards and Hazardous Materials, Noise and Traffic and Transportation would be avoided or reduced to less than significant levels with compliance with existing regulations and with the implementation of mitigation measures. Therefore, potential environmental impacts on human beings, either directly or indirectly, would be less than significant after mitigation.

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