



INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION
FOR THE PROPOSED
PARK TO PLAYA TRAIL

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SECTION 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.

This Initial Study (IS) has been prepared to analyze the environmental impacts of the proposed Park to Playa Trail. 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, which are complete and are not part of the current project. The eastern portion of the Park to Playa Trail would be an approximate 7.0-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 Kenneth Hahn State Recreation Area [KHSRA], and along the Stocker Street Corridor). This IS evaluates the potential environmental impacts associated with the designation of existing and proposed trails in the Baldwin Hills area as the Park to Playa Trail and the construction of various improvements along this eastern portion of the designated trail alignment. (Subsequent references to the Park to Playa Trail or the Proposed Project in this document refer only to the eastern portion where trail improvements are planned).

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 Baldwin Hills Regional Conservation Authority (BHRCA) will be responsible for approving the trail alignment and subsequent implementation of the Park to Playa Trail improvements 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.

This IS for the proposed Park to Playa Trail 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) and 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. This IS/MND provides an evaluation of potential environmental impacts associated with the Park to Playa Trail. 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 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 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

There are existing formal and informal trails at Culver City Park, the Baldwin Hills Scenic Overlook, the KHSRA, and the Stocker Street Corridor in the Baldwin Hills area of the western section of Los Angeles County. The Proposed Project would designate some of the existing trails and would develop new trails that would be known as the Park to Playa Trail. As part of this Project, the designated trail alignment would be improved through the resurfacing, widening, and realigning of some sections of the existing trails; by providing fencing, wayfinding signs, and trailhead facilities (i.e., information kiosks, shade structures, benches, bike racks, and trash cans); landscaping with native plants and restoring habitat in disturbed areas adjacent to the trail; and reconstructing sidewalks, crosswalks, bike lanes, and a drainage channel. The Project also includes trail connections to Ruben Ingold Park, Norman O. Houston Park, and a proposed Los Angeles County neighborhood park. The planned trail improvements to the Park to Playa Trail would provide a comprehensive system of developed trails that would connect various recreational areas and facilities in the Baldwin Hills area to the beach, through the Ballona Creek Bike Path and Marvin Braude Bike Path, which comprise the completed western portion of the Park to Playa Trail.

As discussed in Section 4.0 of this IS/MND, the Proposed Project would have no adverse impacts or less than significant impacts on the following environmental issues due to the proposed low intensity recreational 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 Proposed Project would need to comply with, independent of CEQA review. These regulations also 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:

- Aesthetics
- Air Quality
- Geology and Soils
- Hydrology and Water Quality
- Public Services
- Transportation/Traffic
- 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.

However, based on the analysis in Section 4.0 of this IS/MND, the proposed Park to Playa Trail would have the potential for significant adverse environmental impacts on the following issues:

- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Noise

While 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 identifies the RRs and MMs that would 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 provided in the third column.

As shown, the proposed Park to Playa Trail would have less than significant impacts on all environmental issues after compliance with the RRs and implementation of the recommended MMs.

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
Aesthetics		
<p>RR 4.1-1 In accordance with Chapter 9.12 of the Culver City Municipal Code, the views of existing property owners near Segment C (Blair Hills Corridor) shall be preserved and protected from obstruction by tree growth. Landscaping and landscape maintenance in this area shall preserve the existing views of adjacent property owners through initial tree selection to future trimming; thinning; crown reduction; topping; and/or removal of trees to prevent the obstruction of views.</p>	<p>The Baldwin Hills Regional Conservation Authority (BHRCA) shall include this RR in the landscaping plans and as a note in the Contractor Specifications. The Contractor shall comply with this regulation during landscape installation and maintenance activities at the Blair Hills Corridor Trail.</p>	<p>Less than significant</p>
Air Quality		
<p>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; and limiting vehicle speeds and wind barriers, among others.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation during construction activities.</p>	<p>Less than significant</p>
Biological Resources		
<p>RR 4.4-1 Prior to construction activities in the KHSRA and Stocker Corridor (Segments D, E, G, H, and I) that may require the removal of oak trees or that will be located within the dripline of oak trees, the contractor shall obtain an Oak Tree Permit from the County prior to any vegetation clearing; tree removal; or grading. The permit application to the County shall include a detailed Oak Tree Report and mitigation for impacts to oak trees. All work shall comply with the conditions of the Oak Tree Permit, including tree replacement at a ratio no less than 2:1; acreage replacement equal to the acreage impacted; and/or installation of protective fencing outside the dripline of nearby oak trees throughout construction.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation prior to any site clearing.</p>	<p>Less than significant</p>
<p>RR 4.4-2 For construction activities in the City of Los</p>	<p>The BHRCA shall include this RR as a note in the</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>Angeles (Segments F and G), the contractor shall not remove or relocate any oak, Southern California black walnut, western sycamore, and/or California bay trees without a permit from the City Board of Public Works, and shall include the replacement of affected trees at a 2:1 ratio or relocation on the same property if there is a reasonable probability that the tree will survive.</p>	<p>Contractor Specifications, and the Contractor shall comply with this regulation prior to any site clearing.</p>	
<p>MM 4.4-1 California Sagebrush – California Buckwheat Scrub shall be preserved or restored 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 dedicated as permanent open space and preserved in perpetuity by the BHRCA. A California Sagebrush –California Buckwheat Scrub Restoration Program shall be prepared and implemented 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.</p> <p>If on-site preservation is used to satisfy the mitigation, a qualified Biologist shall mark the limits of California Sagebrush – California Buckwheat Scrub near the construction area. Construction limits shall be flagged in the field, and no earth-moving equipment shall be allowed in these areas.</p> <p>If off-site restoration is used to satisfy the mitigation, the BHRCA shall hire a qualified Biologist to identify a suitable restoration location and to prepare and implement a California Sagebrush – California Buckwheat 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.</p>	<p>For on-site mitigation, the BHRCA shall hire a biologist to flag the the limits of California Sagebrush – California Buckwheat Scrub near the construction area and shall include this MM as a note in the Contractor Specifications; and the Contractor shall comply with this MM prior to and during construction activities.</p> <p>For off-site mitigation, the BHRCA shall hire a qualified Biologist to implement this MM, and the Contractor shall comply with the recommendations of the Biologist prior to and during construction activities.</p>	<p>Less than significant</p>
<p>MM 4.4-2 Prior to vegetation clearing and the start of</p>	<p>The BHRCA shall include this MM as a note in the</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>construction in Segments B, D, F, and G, the contractor shall provide protective fencing around the Southern California black walnut trees in the parking lot of the Baldwin Hills Scenic Overlook and in the KHSRA. 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.</p>	<p>Contractor Specifications, and the Contractor shall comply with this MM prior to and during construction activities.</p>	
<p>MM 4.4-3 Prior to the continuance of construction beyond March 1, 2014, a pre-construction focused survey for special status plants shall be conducted in potentially suitable habitat to confirm the presence or absence of special status plants that have potential to occur. If no special status plants are observed, construction may proceed. If special status plants are observed, a Biologist shall determine the significance of the impact based on status of the species and the number of individuals that would be impacted and shall provide appropriate mitigation. This mitigation shall include avoidance of the species through trail realignment; protection of the species through the establishment of buffer areas where no ground disturbance or construction would be allowed; translocation of the special status plants into adjacent areas with similar habitat prior to the start of vegetation clearing; and/or a minimum 2:1 replacement on-site or at a suitable off-site location.</p>	<p>The BHRCA shall hire a Biologist to conduct the focused surveys, and the recommendations of the Biologist shall be included by the BHRCA as a note in the Contractor Specifications. The Contractor shall comply with the recommendations prior to and during construction activities. The Biologist shall be responsible for translocation and/or replacement efforts.</p>	<p>Less than significant</p>
<p>MM 4.4-4 Seven days prior to the start of construction activities, a qualified Biologist shall survey within 500 feet of the project impact area for the presence of any active raptor nests (common or special status). Any nest found during survey efforts shall be mapped on the construction plans. If no active nests are found, no further mitigation is required. Results of the surveys shall be provided to the California Department of Fish and Wildlife (CDFW).</p> <p>If nesting activity is present at any raptor nest site, the active nest shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the <i>California Fish and Game Code</i>. (Nesting activity for raptors in the region normally occurs from February 1 to June 30.) To protect any nest site, the following restrictions on construction activities are required between February 1 and June 30 (or until nests</p>	<p>The BHRCA 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.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>are no longer active, as determined by the Biologist): (1) clearing limits shall be established within a 500-foot buffer around any occupied nest, or as otherwise determined by the Biologist and (2) access and surveying shall be restricted within 300 feet of any occupied nest, or as otherwise determined by the Biologist. Any encroachment into the buffer area around the known nest shall only be allowed if the Biologist determines that the proposed activity will not disturb the nest occupants. Construction during the non-nesting season can occur only at the sites if the Biologist has determined that fledglings have left the nest.</p> <p>If an active nest is observed during the non-nesting season, the nest site shall be monitored by a qualified Biologist and, when the raptor is away from the nest, the Biologist will flush any raptor to open space areas. The Biologist will then remove the nest site so raptors cannot return to it.</p>		
<p>MM 4.4-5 Construction shall be conducted during the non-nesting season (generally from August 16 to the end of February) to avoid any potential disturbance of avian breeding activities. If work is to be conducted during the general nesting season (March 1–August 15), then a pre-construction nesting bird survey shall be conducted by a qualified Biologist within three days prior to disturbance. 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 will 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 will be designed to prevent disruption of nesting activity. Only limited construction activities (if any) will be approved by the Biologist to take place within the buffer zone. The buffer zone restrictions will be suspended once the Biologist determines that nesting activity has ceased.</p>	<p>The BHRCA 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.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>MM 4.4-6 Prior to the approval of the project plans and specifications, the BHRCA shall confirm that regulatory permit authorizations from the U.S. Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (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 be characterized as dredge or fill within “Waters of the U.S.,” including wetlands, and/or “Waters of the State”. Habitat preservation or replacement/restoration that will result in no net loss of riparian habitat shall be used to offset impacts, as outlined in the agency-approved Habitat Mitigation Monitoring Plan (HMMP).</p>	<p>If necessary, the BHRCA shall obtain resource agency permits and hire a Biologist to develop and implement the HMMP. The Contractor shall comply with permit conditions related to on-site habitat preservation prior to and during construction activities.</p>	<p>Less than significant</p>
Cultural Resources		
<p>RR 4.5-1 In accordance with Section 7050.5 of the <i>California Health and Safety Code</i>, 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.</p> <p>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 <i>California Public Resources Code</i>, 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</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation upon the discovery of human remains during ground-disturbing activities.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>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 <i>California Code of Regulations</i> §15064.5[e]).</p>		
<p>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.</p> <p>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 <i>California Public Resources Code</i> (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.</p> <p>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.</p> <p>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.</p>	<p>Prior to the start of construction activities, the BHRCA shall retain a qualified Archaeologist to implement this MM, including the monitoring of grading activities and the salvage and catalogue of archaeological resources, as necessary.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
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.		
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 BHRCA shall include this MM as a note in the Contractor Specifications, and the Contractor shall comply with this regulation upon the discovery of fossil resources during ground-disturbing activities. The BHRCA shall hire the Paleontologist 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.	This RR shall be included in the Engineering Plans and as a note in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval 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. The recommendations of the geotechnical report shall be used in the engineering design and construction of proposed structures.	This RR shall be included in the Engineering Plans and as a note in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval during the plan check process. Approved plans shall be implemented by the Contractor.	Less than significant

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
Hazards and Hazardous Materials		
<p>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.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with pertinent hazardous material regulations during construction and maintenance activities for the Park to Playa Trail.</p>	<p>Less than significant</p>
<p>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.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with these regulations during construction activities near or across underground utility lines.</p>	<p>Less than significant</p>
<p>RR 4.8-3 In the event that proposed trail improvements would be located on or near abandoned oil wells, 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; a 10-foot building setback; maintenance of 50-foot access; and provision of vent combs.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with pertinent DOGGR regulations during construction activities on or near abandoned wells.</p>	<p>Less than significant</p>
<p>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</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation during construction and maintenance activities along the Park to Playa Trail.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
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.		
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 the Park to Playa Trail, which outline prohibitions on open burning, smoking, flaming or glowing objects, and open flames.	The BHRCA shall include this RR in the Engineering Plans and in the Contractor Specifications. The Engineer shall include the required signs in the project plans; the Contractor shall install the required signs; and the Contractor shall comply with these regulations during construction and maintenance activities along the Park to Playa Trail.	Less than significant
<p>MM 4.8-1 The Contractor shall implement the following soil management practices during grading and construction activities along Segment C (Blair Hills Corridor Trail) and Segment H (Eastern Ridgeline Trail):</p> <ul style="list-style-type: none"> • Field oversight of grading operations, including spot checks of soils with a photo-ionization detector (PID) for volatile organic compounds (VOCs) and an X-ray fluorescence (XRF) for metals, is recommended with California Department of Toxic Substances Control (DTSC) concurrence. • Direct contact with total petroleum hydrocarbon (TPH) contaminated soils by human bodies shall be avoided (due to aesthetic or odor concerns). All construction and maintenance workers shall be trained to avoid direct contact with TPH-contaminated soils (e.g., wearing plastic or rubber gloves). • Any on-site, TPH-contaminated soils exposed or excavated may remain on site; however, at least two feet of clean fill material (imported or from on-site sources) shall be placed over the TPH-contaminated areas where potential contact may occur. With a cap of two feet of clean fill, no direct contact or potential health risks would be anticipated from the site's intended use, namely recreational use of trails. • Proper disposal requirements imposed by the disposal facility shall be followed if off-site disposal of TPH- 	The BHRCA shall include this MM as a note in the Contractor Specifications. The Contractor shall comply with this mitigation during construction activities on Segments C and H.	Less than significant

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>contaminated or stockpiled soils is planned.</p> <ul style="list-style-type: none"> • While no unacceptable risks or hazards were identified for the intended land use (namely recreational use of trails), any other use of the site shall require additional site characterization and a human health risk evaluation. • Enclosed structures (e.g., restrooms) shall not be constructed on site due to a potential for methane vapor intrusion and accumulation, unless otherwise specially approved by DTSC. Any future structures shall require additional characterization (e.g., soil gas survey) and evaluation of the potential for vapor intrusion, including the potential for accumulation of explosive levels of methane. 		
Hydrology and Water Quality		
<p>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.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation prior to and during construction activities for the Proposed Project.</p>	<p>Less than significant</p>
<p>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</p>	<p>The BHRCA shall include this RR shall as a note in the Contractor Specifications. The Contractor shall comply with this regulation during construction and maintenance activities along the Park to Playa Trail.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>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.</p>		
Noise		
<p>RR 4.12-1 Project construction shall comply with the most restrictive time limits 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.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation during construction activities.</p>	<p>Less than significant</p>
<p>MM 4.12-1 Prior to the start of construction activities, the Contractor shall implement the following:</p> <ul style="list-style-type: none"> 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, picnic areas, and the Windsor Hills Elementary School as feasible. Where stationary equipment must be located within 250 feet of a residence or school, 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 	<p>The BHRCA shall include this MM as a note in the Contractor Specifications, and the Contractor shall implement this MM during construction activities, subject to inspection by the BHRCA.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
residences and the Windsor Hills Elementary School as feasible.		
Public Services		
<p>RR 4.14-1 Users of the Park to Playa Trail that are located in the KHSRA, Stocker Corridor, and Blair Hills Corridor would need to 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.</p> <p>Signs shall be provided along the trail to inform the public of allowable uses and activity restrictions.</p>	<p>The BHRCA shall include these signs in the project plans to be constructed/installed by the Contractor. The County Sheriff's Department shall be responsible for monitoring and enforcing these regulations on Segments C through I of the Park to Playa Trail.</p>	<p>Less than significant</p>
<p>RR 4.14-2 Users of Culver City Park are subject to Chapter 9.10 of the Culver City Municipal Code, which regulates tree planting; permitted activities in the parks; hours of operation; and other prohibitions.</p>	<p>The Culver City Police Department shall be responsible for monitoring and enforcing these regulations along Segment A (Culver City Park).</p>	<p>Less than significant</p>
<p>RR 4.14-3 Title 14, Division 3 of the <i>California Code of Regulations</i> 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.</p>	<p>The State Parks Ranger shall be responsible for monitoring and enforcing these regulations along Segment B (Baldwin Hills Scenic Overlook).</p>	<p>Less than significant</p>
Transportation/Traffic		
<p>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.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications. During construction activities, the Contractor shall provide temporary traffic control measures in accordance with the Greenbook and Graybook.</p>	<p>Less than significant</p>

**TABLE 1-1
REGULATORY REQUIREMENTS AND MITIGATION MEASURES**

Regulatory Requirement/Mitigation Measure	Implementing Action	Level of Impact after Implementation
<p>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.</p>	<p>The BHRCA shall include this RR as a note in the Engineering Plans and in the Contractor Specifications. The Engineer shall design and the Contractor shall construct all improvements on public roadways in accordance with the MUTCD.</p>	<p>Less than significant</p>
<p>Utilities and Service Systems</p>		
<p>RR 4.17-1 As stated in Chapter 20.87, Construction and Demolition Debris Recycling and Reuse, of the Los Angeles County Code, at least 50 percent of all construction and demolition debris, soil, rock, and gravel removed from a project site shall be recycled or reused unless a lower percentage is approved by the County of Los Angeles Director of Public Works. 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.</p>	<p>The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation during construction activities for the Park to Playa Trail.</p>	<p>Less than significant</p>

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 above, potentially significant environmental impacts from the proposed Park to Playa Trail would be reduced to less than significant levels.

1.3 PUBLIC REVIEW AND PROJECT APPROVAL

In accordance with Section 15073 of the CEQA Guidelines, a 30-day public review and comment period (from January 16 to February 18, 2013) was established to allow affected and interested agencies with an opportunity to provide input on the project's environmental review process. At the start of this review period, the IS/MND was distributed to responsible and trustee agencies and other interested agencies for review and comment.

In compliance with Section 15072 of the CEQA Guidelines, a Notice of Intent to Adopt the IS/MND was also published in the *Los Angeles Times* newspaper on January 16, 2013 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 IS/MND and associated technical reports were made available for public review at the following locations:

Baldwin Hills Regional Conservation Authority
Los Angeles River Center and Gardens
570 West Avenue 26, Suite 100
Los Angeles, California 90065

and

View Park Library
Reference Desk
3854 54th Street
Los Angeles, CA 90043
<http://www.colapublib.org/libs/viewpark/index.php>

and

Culver City Julian Dixon Library
Reference Desk
4975 Overland Avenue
Culver City, CA 90230
<http://www.colapublib.org/libs/culvercity/index.php>

This document was also made available for viewing at the Baldwin Hills Regional Conservation Authority website at <http://smmc.ca.gov/BHRCA.asp>.

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

Ms. Josephine Alido
BonTerra Consulting
225 South Lake Avenue, Suite 1000
Pasadena, California 91101
jalido@bonterraconsulting.com

In accordance with Section 15074 of the CEQA Guidelines, prior to approving 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 there is no substantial evidence that the Project will have a significant effect on the environment.

1.4 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 at each segment of the proposed trail alignment are described in this section.

Section 3.0: Project Description. This section describes the objectives established for the Park to Playa Trail; 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 provides the analysis of the potential impacts on each environmental issue area that may result from implementation of the Proposed Project, as provided in this section. The environmental checklist form includes “mandatory findings of significance” in compliance with CEQA requirements. This section contains the analysis of environmental impacts and 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 preparation of the IS/MND.

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

SECTION 2.0 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

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, which are complete and are not part of the current project for which construction documents are being completed. The current project is the eastern portion of the Park to Playa Trail, which would be located in the Baldwin Hills area at the western section of Los Angeles County in the Cities of Los Angeles and Culver City and unincorporated County land. The proposed trail location is shown in Exhibit 2-1, Regional Location and Local Vicinity. This trail corridor consists of nine segments that generally correspond to the owner or operator of the public park or open space area where the trail alignment is proposed. Exhibit 2-2, Proposed Trail Corridor, provides an overview of the trail corridor.

2.2 PROJECT BACKGROUND

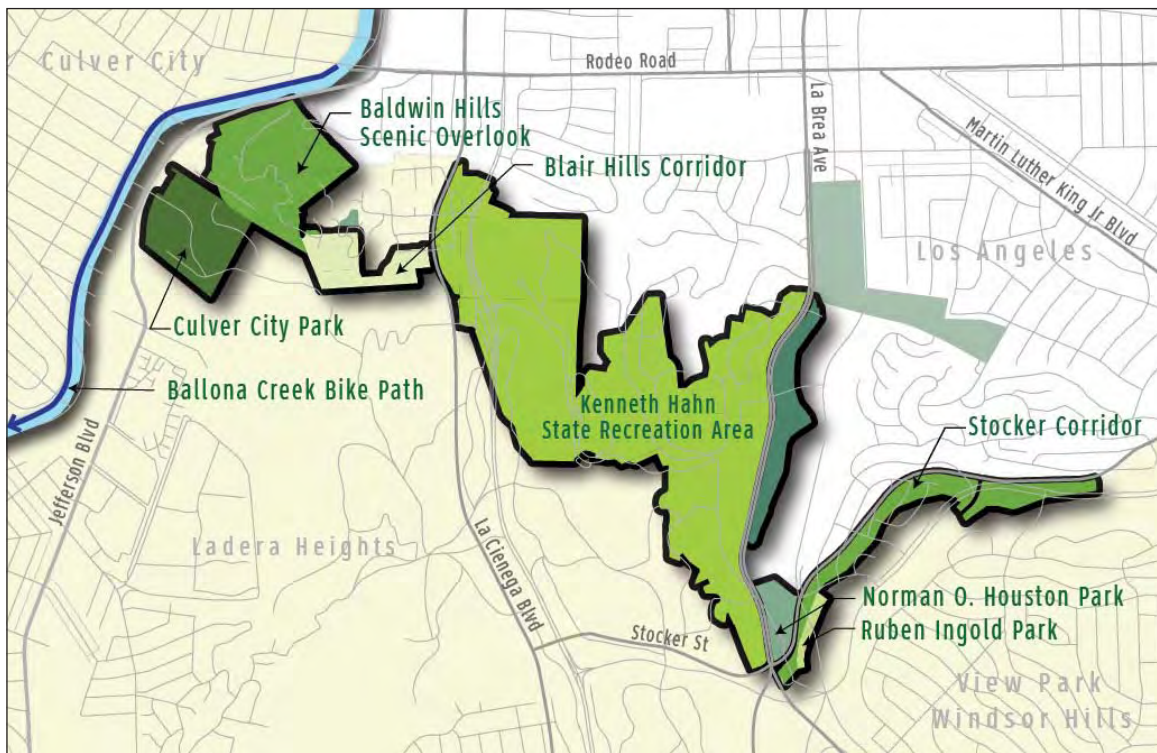
Oil production in the Baldwin Hills started in 1924 and residential development occurred in the late 1940s and the 1950s (CDMG 1982). Land acquisition for parks and open space started in the 1980s when the State of California initially acquired 500 acres of land in the Baldwin Hills in 1982 for a wilderness 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, which would be 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 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 to the KHSRA, the Baldwin Hills Scenic Overlook, and undeveloped land in the Blair Hills Corridor.



Source: Alta Planning + Design 2011

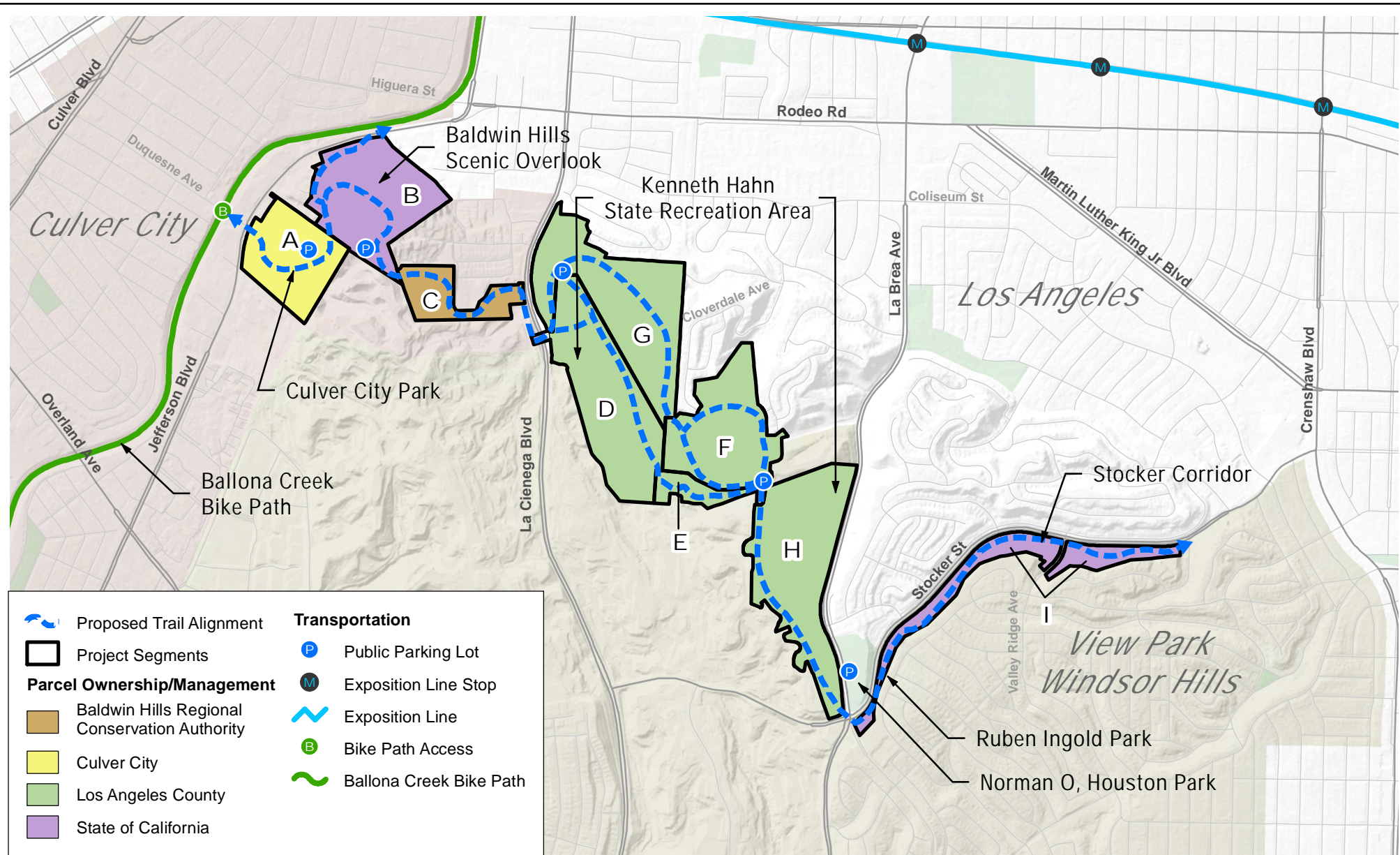
Regional Location and Local Vicinity

Exhibit 2-1

Park to Playa Trail



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	Proposed Trail Alignment	Transportation	
	Project Segments		Public Parking Lot
Parcel Ownership/Management			Exposition Line Stop
	Baldwin Hills Regional Conservation Authority		Exposition Line
	Culver City		Bike Path Access
	Los Angeles County		Ballona Creek Bike Path
	State of California		

Proposed Trail Corridor

Park to Playa Trail

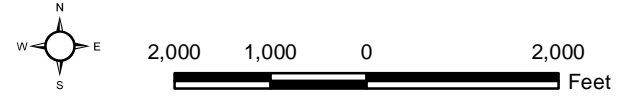


Exhibit 2-2



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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, Eastern Gateway Entrance at the KHSRA, and a branding and signage plan that have since been implemented.

In 2010, the Mountains Recreation and Conservation Authority¹ (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, for which no improvements are proposed and thus, are not part of the current project.

The eastern portion of the trail constitutes the Proposed Project through the Baldwin Hills area, for which coordination efforts with various affected agencies are still ongoing. These agencies include the CDPD; 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 three community meetings, an online survey, and trail and park user interviews to solicit input on the trail alignment; needed connections to park facilities and community destinations; and preferred trail improvements, as well as to obtain comments on a preliminary proposal. The Park to Playa Trail Feasibility Study and Wayfinding Plan was completed in November 2011. The Plan identifies 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 provides specific recommendations for trail design, phasing, and implementation.

The BHRCA is now managing the design phase for the Project. Upon the BHRCA's approval of the proposed trail alignment and trail improvements, these improvements would be implemented by the BHRCA in cooperation with the owners/operators of the parks and open space properties where the individual trail improvements are proposed.

2.3 PROJECT SITE CHARACTERISTICS

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 Quaternary² 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 (at the western end of the proposed trail alignment); 511 feet above msl at the top of the Eastern Ridgeline Trail in the KHSRA; 420 feet above msl at the Baldwin Hills Scenic Overlook; nearly 500 feet above msl at the Western Ridgeline Trail in the KHSRA; and over 400 feet above msl at the Stocker Street

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.

Corridor (where the Stocker Corridor Trail passes through the north-facing slopes of the Windsor Hills).

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 production. Vegetation in the area consists primarily of ornamental, ruderal, grasslands, and sage scrub vegetation.

The proposed Park to Playa Trail corridor consists of nine segments through the northern section of the Baldwin Hills and surrounding areas. The proposed trail alignment would generally follow 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 2-3, Aerial Photograph, shows the trail segments over an aerial photograph of the area.

Table 2-1 identifies the owner, operator, and jurisdiction where each trail segment is located.

As noted in the table, there are varying owners, operators, and jurisdictions along the trail alignment, although most of the areas that the trail traverses are in the KHSRA, which consists of public lands owned by the State of California that are managed by the Los Angeles County Department of Parks and Recreation. An operating agreement between the State and County has been established to allow for long-term maintenance and operation of the recreational facilities and public lands in the KHSRA and Stocker Corridor.

Walkers, joggers, hikers, bicyclists, leashed-dog walkers, roller bladers, and skate boarders are allowed on the existing trails; however, bicyclists are not allowed at Culver City Park or the Baldwin Hills Scenic Overlook, and leashed-dog walkers are not allowed at the Baldwin Hills Scenic Overlook. No equestrians are allowed on any trail segment.

Descriptions of each trail segment are provided below.

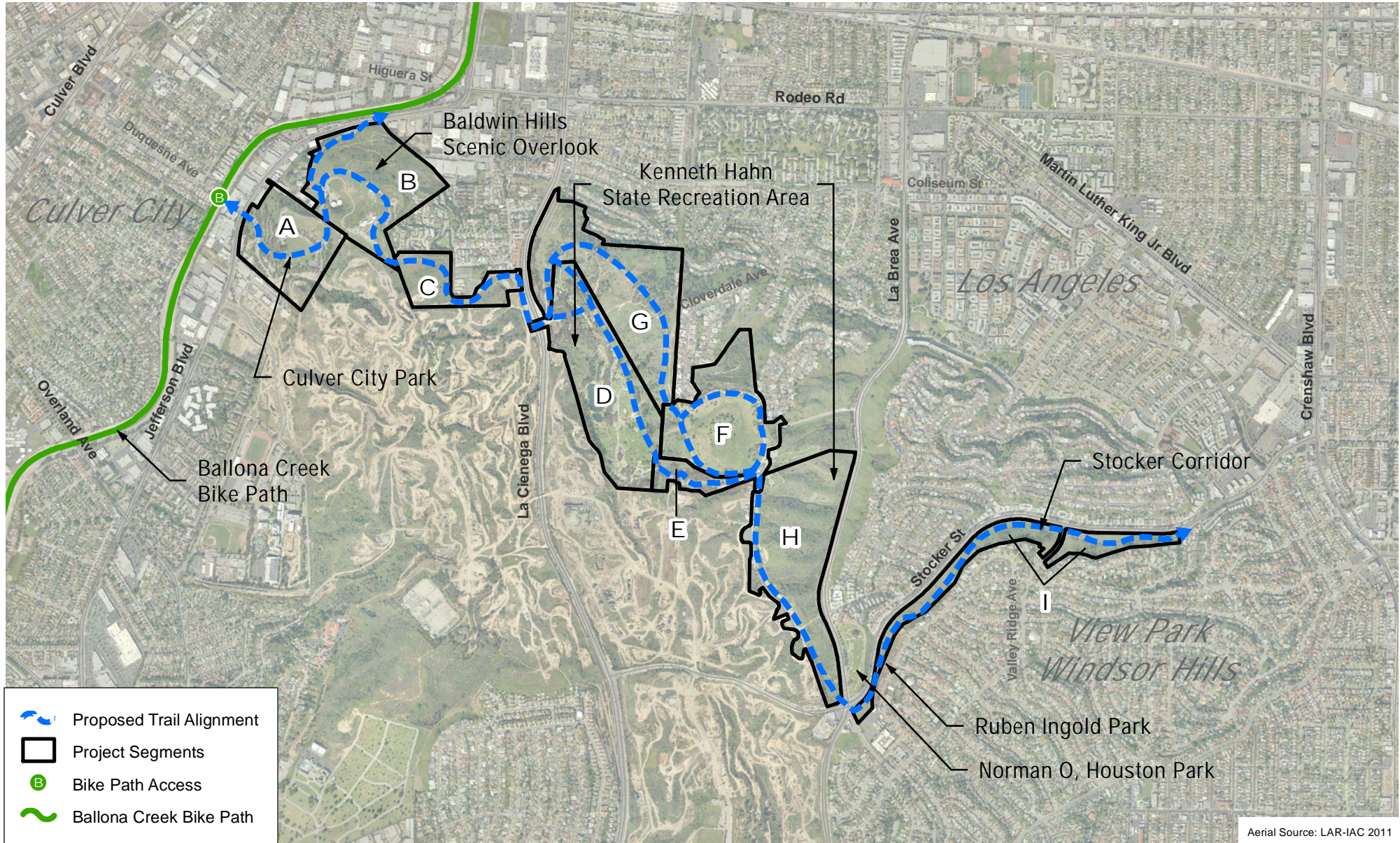
2.3.1 SEGMENT A: CULVER CITY PARK

Culver City Park is a 30-acre park located on a hill east of Jefferson Boulevard. This park is owned and operated by the City of Culver City. It is developed with three softball diamonds, a baseball field, a skate park, a picnic area, a dog park, basketball courts, a playground, a boardwalk, and trails. Duquesne Avenue leads up to the game fields on the hill and separates the skate park, playground, and picnic area at the park's lower southwestern section along Jefferson Boulevard from the softball diamonds and baseball field at the top of the hill.

There is a trail that winds up the western slope from the lower parking lot on Duquesne Avenue to the upper parking lot. This park is also connected to the Baldwin Hills Scenic Overlook by a dirt trail.

East and southeast of Culver City Park are areas under active oil and gas extraction and production. Industrial developments are present to the south, west, and north of the park, and the Baldwin Hills Scenic Overlook is located to the northeast (See Exhibit 2-4, Segment A – Culver City Park).

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Aerial Photograph

Park to Playa Trail



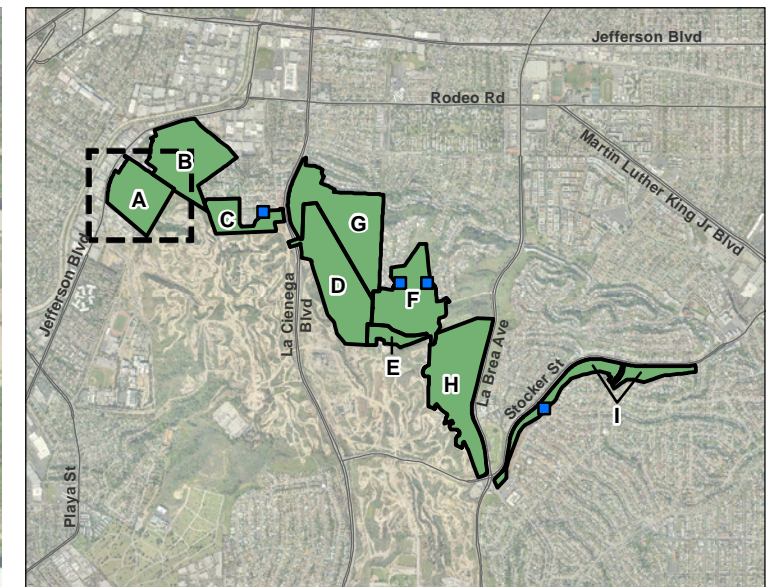
Exhibit 2-3



(Rev: 1-10-2013 CJS) Projects\Alta\003\Ex_aerial_LV.pdf

**TABLE 2-1
TRAIL SEGMENTS**

Segment Name	Location	Owner	Operator	Jurisdiction	Adjacent Parks/ Recreational Facilities
A: Culver City Park	East of Jefferson Blvd	Culver City	Culver City	Culver City	Baldwin Hills Scenic Overlook Ballona Creek Bike Path
B: Baldwin Hills Scenic Overlook	East of Jefferson Blvd	State Parks	State Parks	Culver City	Culver City Park
C: Blair Hills Corridor	West of La Cienega Blvd	BHRCA	BHRCA	Culver City	KHSRA Blair Hills Park Baldwin Hills Scenic Overlook
D: Valley Trail	Access bridge and in KHSRA, east of La Cienega Blvd	State Parks LA County (bridge)	LA County Department of Parks and Recreation LA County Department of Public Works	City of LA and Unincorporated LA County	Picnic areas in KHSRA Japanese Garden Waterfall Gwen Moore Lake
E: Hilltop Connector Trail	In KHSRA, east of La Cienega Blvd	State Parks	LA County Department of Parks and Recreation	Unincorporated LA County	Janice's Green Valley Picnic areas in KHSRA
F: Janice's Green Valley Loop Trail	Janice's Green Valley in KHSRA	State Parks	LA County Department of Parks and Recreation	City of LA	Picnic areas in KHSRA
G: Western Ridgeline Trail	In KHSRA, east of La Cienega Blvd	State Parks	LA County Department of Parks and Recreation	City of LA and Unincorporated LA County	Janice's Green Valley Japanese Garden Olympic Forest
H: Eastern Ridgeline Trail	In KHSRA, west of La Brea Avenue	State Parks	LA County Department of Parks and Recreation	Unincorporated LA County	Norman Houston Park Jim Guillam Park Janice's Green Valley
I: Stocker Street Corridor	Slope setback along Stocker Street, east of La Brea Avenue	State Parks	LA County Department of Parks and Recreation	Unincorporated LA County	Ruben Ingold Park Norman Houston Park KHSRA
State Parks: California Department of Parks and Recreation; LA: Los Angeles; BHRCA: Baldwin Hills Regional Conservation Authority; KHSRA: Kenneth Hahn State Recreation Area					





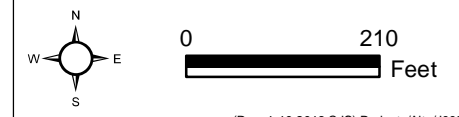
-  Project Segments
-  Noise Measurement Locations

Exhibit 2-4
Segment A - Culver City Park



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2.3.2 SEGMENT B: BALDWIN HILLS SCENIC OVERLOOK

The Baldwin Hills Scenic Overlook (formerly called Vista Pacifica) is a 68-acre open space area that provides panoramic views of the Pacific Coast, the Los Angeles Basin, and the mountains surrounding the basin. Access to this area is provided by Hetzler Road that winds up to the top of a hill. The overlook features a trailhead; a stairway to the top of the hill; a visitor center; several trails; a picnic area; an observation deck; and a parking lot. Water tanks owned by Southern California Water Company are located at the southern section of this area.

Adjacent land uses include Jefferson Boulevard to the northwest; industrial uses to the northeast; single family homes to the east and off Tompkins Way to the west; oil production areas to the southeast; and the Culver City Park to the southwest (See Exhibit 2-5, Segment B – Baldwin Hills Scenic Overlook).

The Baldwin Hills Scenic Overlook is owned and operated by California Department of Parks and Recreation. The State is currently realigning the trail from the observation deck down to Hetzler Road to reduce slope erosion and is constructing a sidewalk along Hetzler Road. In addition, the City of Culver City is planning to improve the sidewalk at the intersection of Jefferson Boulevard and Hetzler Road, and will be installing new traffic signal, crosswalk, curb extensions, raised median islands, bike lanes, and parking lot improvements. These improvements are under construction and not part of the Proposed Project.

2.3.3 SEGMENT C: BLAIR HILLS CORRIDOR

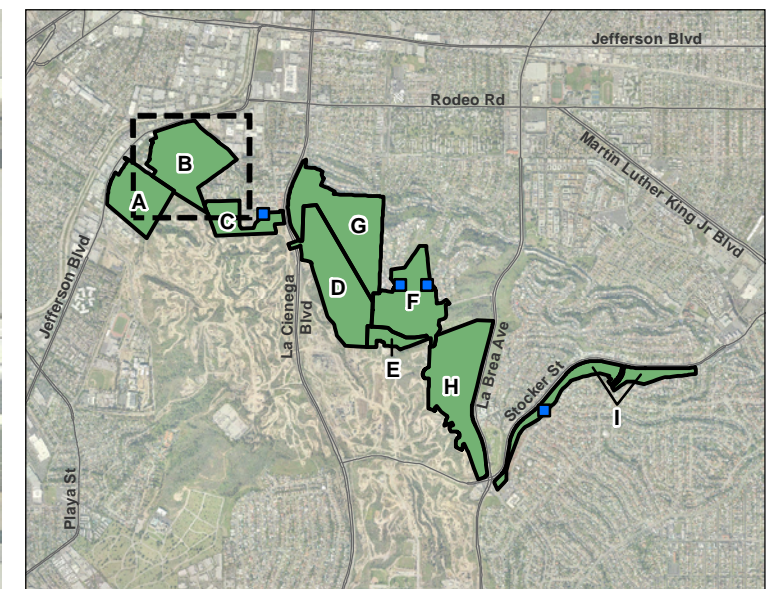
The BHRCA owns the 18-acre undeveloped area in Blair Hills between the KHSRA and the Baldwin Hills Scenic Overlook. This area has both steep slopes and flat areas, and features dirt roads associated with past oil drilling operations. It is currently not available for hiking or recreational use by the public. A flood-control basin is present at the western section of this area, as defined by a relatively flat area with a riser pipe and a concrete berm on the north side (See Exhibit 2-6, Segment C – Blair Hills Corridor).

The Blair Hills Corridor is bound by La Cienega Boulevard on the east; private properties (owned by Chevron, Plains Exploration and Production, Moynier Oil, and David Trust) under active oil production on the south and southwest; the Baldwin Hills Scenic Overlook to the northwest; and single-family homes, Blair Hills Park, and an abandoned school (Ohr Eliyahu Academy) on the north. The school site is now owned by the BHRCA and is planned as a future public space. However, the school site is not part of the Park to Playa Trail project and future proposals for this site would be subject to separate CEQA documentation and review.

Blair Hills Park is a 1.62-acre park located north of the Blair Hills Corridor and is owned by the City of Culver City. It is developed with a picnic area, a playground, a softball diamond, a basketball court, and an open field.

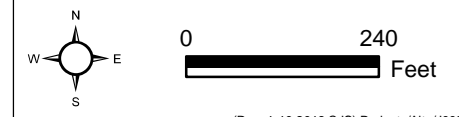
2.3.4 SEGMENT D: VALLEY TRAIL

The KHSRA is a State Park located in the unincorporated area of the County land and the City of Los Angeles (northern end of KHSRA between La Cienega Boulevard and La Brea Avenue); however, the park is operated by Los Angeles County Department of Parks and Recreation. The KHSRA includes approximately 319 acres of land and features 4 playgrounds; a half basketball court; a fishing lake (Gwen Moore Lake); a lotus pond; 2 lighted baseball diamonds; open fields; a sand volleyball court; a meeting room; picnic shelters; barbecue pits; and several formal and informal trails. A number of communication towers are located on ridgelines in the KHSRA.

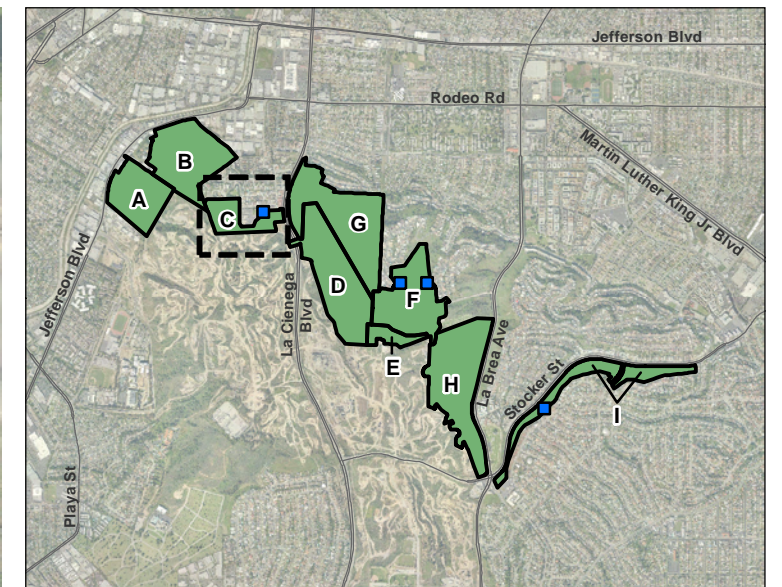


- Project Segments
- Noise Measurement Locations

Exhibit 2-5
Segment B – Baldwin Hills Scenic Overlook

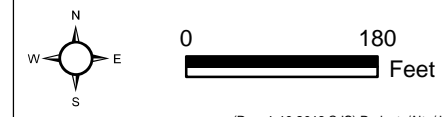


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- Project Segments
- Noise Measurement Locations

Exhibit 2-6
Segment C - Blair Hills Corridor



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The Valley Trail is a proposed trail east of La Cienega Boulevard and along the toe of the west-facing slopes at the western section of the KHSRA. The trail would include a pedestrian sidewalk on the bridge over La Cienega Boulevard to the KHSRA entrance, with one leg of the trail generally trending in a southeasterly direction along the eastern edge of the lower picnic areas and another leg trending in a northwesterly direction toward the Japanese Garden and a small manmade waterfall.

North and east of the Valley Trail alignment are rising slopes in the KHSRA and the Western Ridgeline Trail. To the south and west are the lower picnic areas and fishing lake in the KHSRA (See Exhibit 2-7, Segment D – Valley Trail).

2.3.5 SEGMENT E: HILLTOP CONNECTOR TRAIL

The Hilltop Connector Trail is a proposed trail that would connect the upper and lower areas of the KHSRA. An internal access road and a concrete-lined drainage ditch run parallel to a concrete sidewalk from the lower picnic areas to the upper areas of the KHSRA. The trail would replace the sidewalk and would connect the lower picnic areas to Janice's Green Valley, which is a relatively flat area defined by a circular paved access road along its perimeter. The trail would wind up and generally trend in a southeasterly direction on the north side of the access road toward the southern section of the upper valley.

North of the proposed Hilltop Connector Trail are rising slopes in the KHSRA and Janice's Green Valley, with the KHSRA access road located to the south; the lower picnic areas of the KHSRA to the west; and restrooms, drinking fountains, picnic areas, a playground, a parking area, and the Eastern Ridgeline Trail in the upper sections of the KHSRA to the east (See Exhibit 2-8, Segment E – Hilltop Connector Trail).

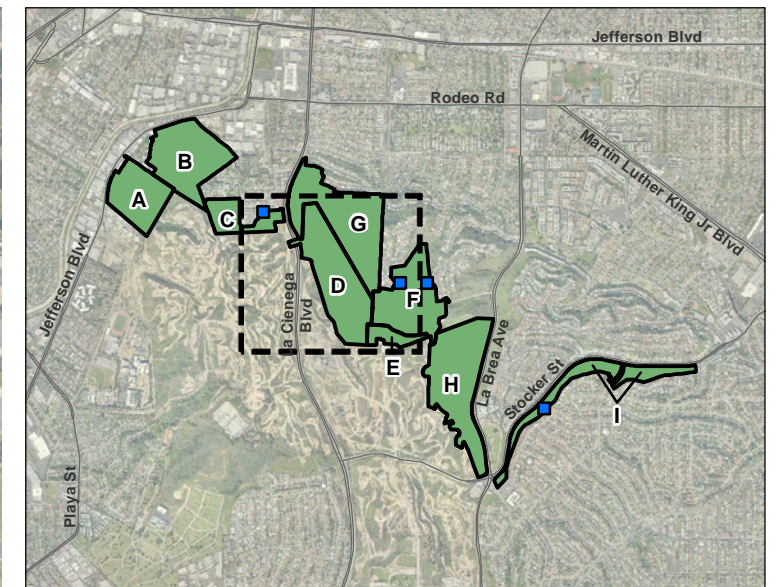
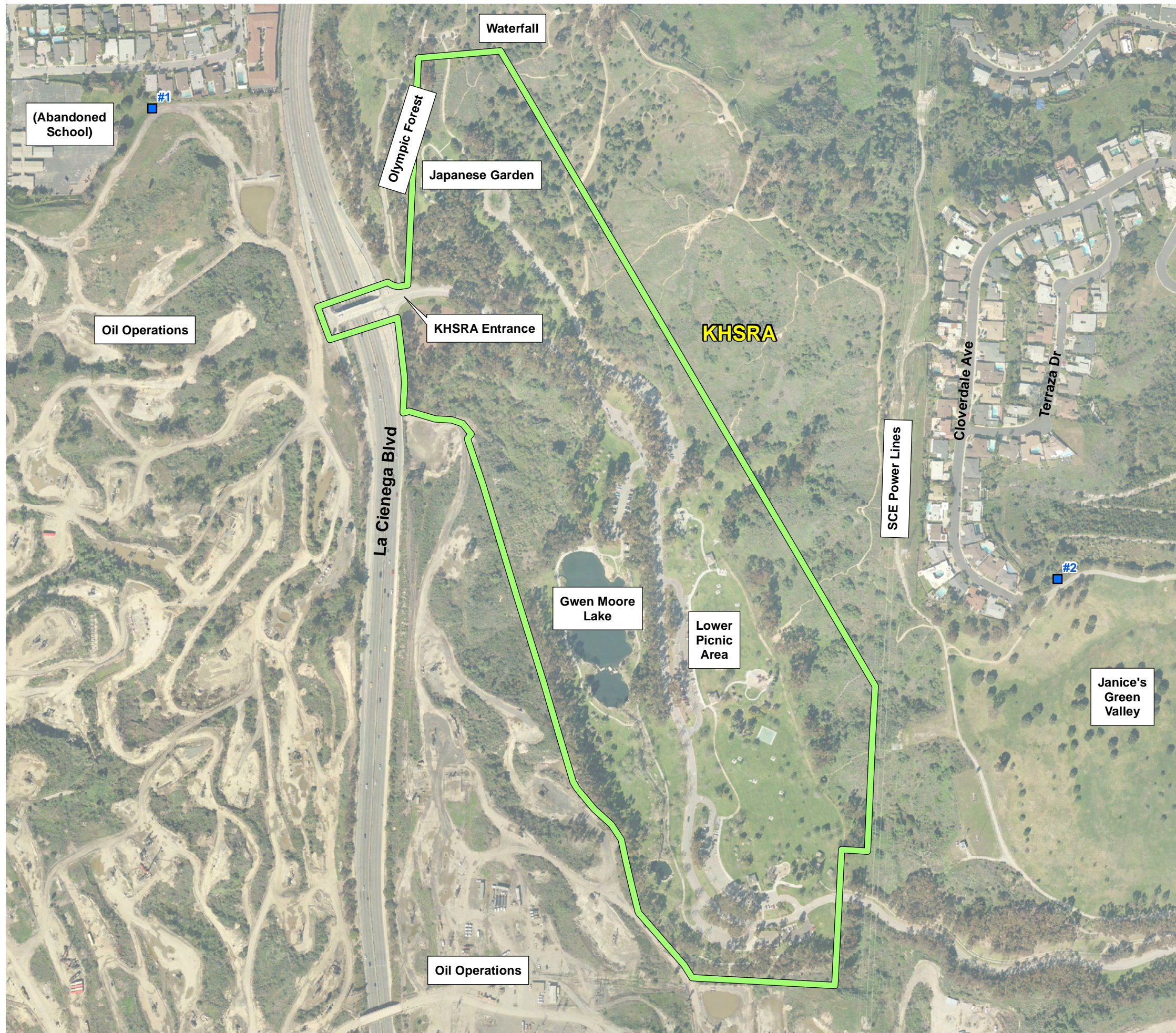
2.3.6 SEGMENT F: JANICE'S GREEN VALLEY LOOP TRAIL

The Janice's Green Valley Loop Trail is proposed along an access road that encircles Janice's Green Valley. This valley is a relatively flat area that was the former location of the Baldwin Hills Reservoir, which has since been filled. The access road around the valley connects with the Eastern Ridgeline Trail on the southeast and with the Western Ridgeline Trail to the northwest.

North of the Janice's Green Valley Loop Trail alignment are descending slopes in the KHSRA, with residences on Cloverdale Avenue to the northwest and residences on Punta Alta Drive to the northeast. East of the trail are also descending slopes in the KHSRA toward La Brea Avenue. South of the trail alignment are slopes and the KHSRA internal access road. To the west are Southern California Edison Company (SCE) transmission lines in an easement that cuts through the KHSRA (See Exhibit 2-9, Segment F – Janice's Green Valley Loop Trail).

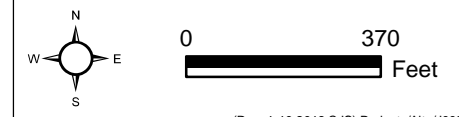
2.3.7 SEGMENT G: WESTERN RIDGELINE TRAIL

The Western Ridgeline Trail goes through the top of the hills in the western section of the KHSRA, northwest of Janice's Green Valley. This trail starts at the northwestern corner of the Janice's Green Valley Loop Trail and extends in a northerly direction to the top of the hill, where it becomes the City View Trail. The trail then runs in a northwesterly direction along the ridgeline, then in a southerly direction toward the Waterfall and the Olympic Forest (through a timber staircase), and ends at the KHSRA entrance on La Cienega Boulevard. There are several shade structures along various volunteer trails near this trail, which serve as overlook areas along the trail. These structures include Inspiration Point and Autumn's Peak.

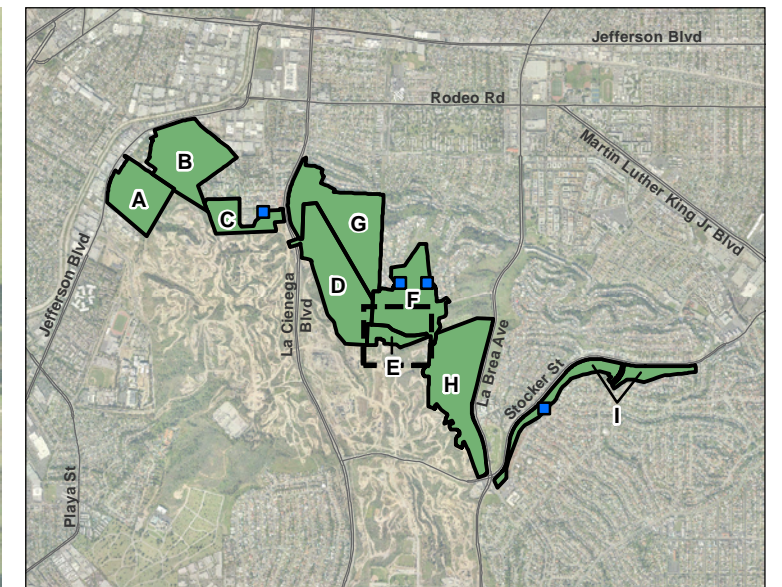


- Project Segments
- Noise Measurement Locations

Exhibit 2-7
Segment D - Valley Trail

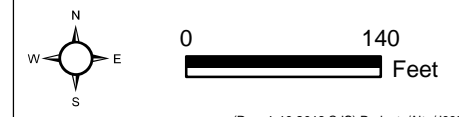


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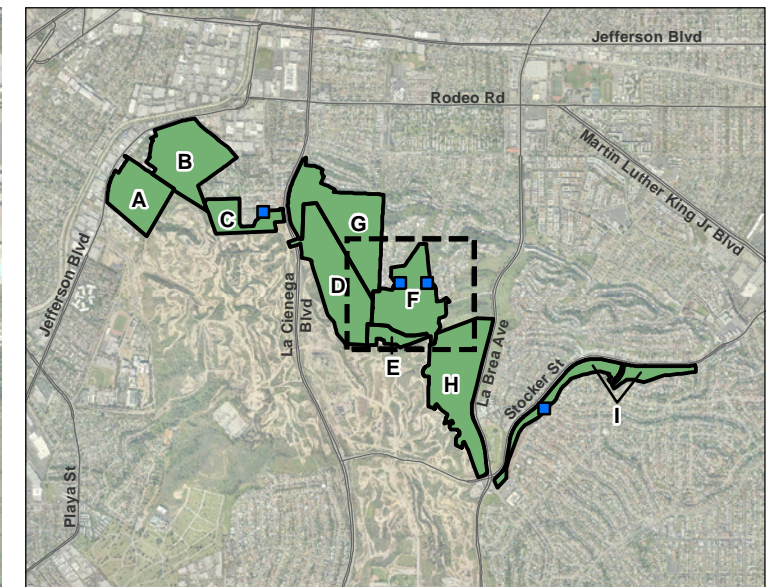


- Project Segments
- Noise Measurement Locations

Exhibit 2-8
Segment E - Hilltop Connector Trail



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- Project Segments
- Noise Measurement Locations

Exhibit 2-9
Segment F – Janice's Green Valley Loop Trail

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The access road for the SCE transmission lines that cut through the KHSRA and single-family homes on Cloverdale Avenue are located to the east of the trail. Single-family homes on Glenford Street are located to the north. La Cienega Boulevard runs along the western edge of the KHSRA in this area. South of the trail are dropping slopes in the KHSRA (See Exhibit 2-10, Segment G – Western Ridgeline Trail).

2.3.8 SEGMENT H: EASTERN RIDGELINE TRAIL

Located west of La Brea Avenue, existing dirt trails are found along the east-facing slopes of the KHSRA. The unpaved access road along the ridgeline that separates the KHSRA from the oil well production areas to the west serves as the Eastern Ridgeline Trail. A maintenance yard for the KHSRA is located along the access road. The Baldwin Hills Conservancy has constructed an entrance to the Eastern Ridgeline Trail at La Brea Avenue across Don Lorenzo Drive. The entryway includes a staircase access, retaining walls, and native plant revegetation near La Brea Avenue and a 16-foot wide trail that leads to the access road along the ridgeline.

The eastern boundary of the KHSRA is defined by La Brea Avenue, with Norman Houston Park, Jim Guillam Park, and a sloped area behind single-family and multi-family residences on Don Miguel, Don Felipe and Don Carlos Drives and located in the City of Los Angeles located east of La Brea Avenue.

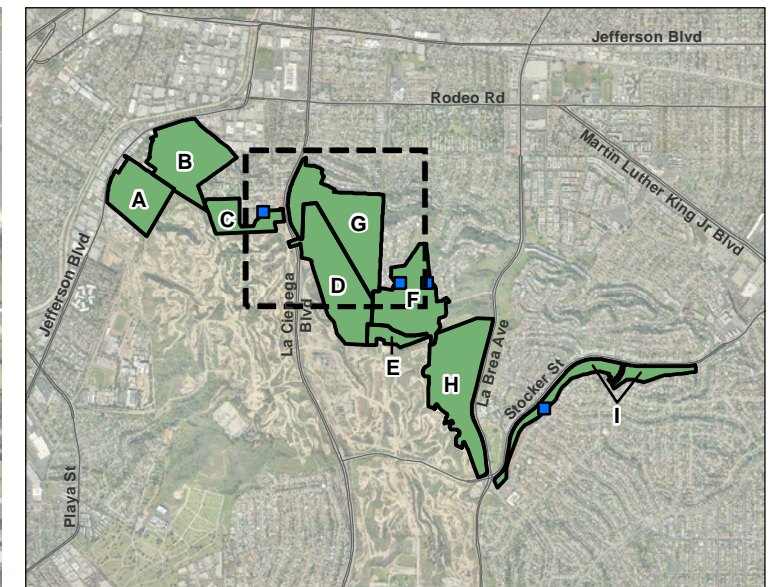
The Norman Houston Park is a 4.0-acre park located east of La Brea Avenue and north of Stocker Street. It is developed with a loop trail (paved with decomposed granite), open fields, basketball courts, a playground, and outdoor fitness equipment. The Jim Guillam Park is located across La Brea Avenue, northeast of the KHSRA. This park is developed with tennis courts, basketball courts, a baseball field, picnic areas, a tot lot, and a parking lot. Both parks are owned by the City of Los Angeles.

The northern boundary of the KHSRA abuts single-family residences on Veronica Street, El Mirador Drive, Punta Alta Drive, and Manitova Drive in the City of Los Angeles. Oil drilling operations are located west of the Eastern Ridgeline Trail (See Exhibit 2-11, Segment H – Eastern Ridgeline Trail).

The County is proposing to improve the existing access road at the northern segment of the Eastern Ridgeline Trail and add fitness zones, concrete animal sculptures, benches, and trash cans. The County is also planning to realign the southern segment of the access road to connect to the northwest corner of La Brea Avenue and Stocker Street (at the Five Points intersection created by La Brea Avenue, Overhill Drive, and Stocker Street). These improvements were subject to a separate CEQA documentation and review process and are not part of the Park to Playa Trail. It is anticipated that these improvements would be in place prior to the start of construction activities for the Proposed Project.

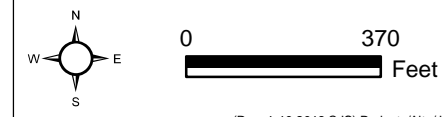
2.3.9 SEGMENT I: STOCKER STREET CORRIDOR

The Stocker Street Corridor is a 33-acre sloped area along Stocker Street owned by the State of California. This trail corridor starts at the Five Points intersection of Stocker Street with Overhill Drive and La Brea Avenue and extends northeast to Valley Ridge Avenue and from Valley Ridge Avenue to just west of Presidio Drive. An informal trail/dirt trail is present on the north-facing slopes located on the south-southeast side of Stocker Street, behind the Windsor Hills Elementary School, along Ruben Ingold Park, and behind single-family residences on Mount Vernon Drive, Enoro Drive, and Kenway Avenue.

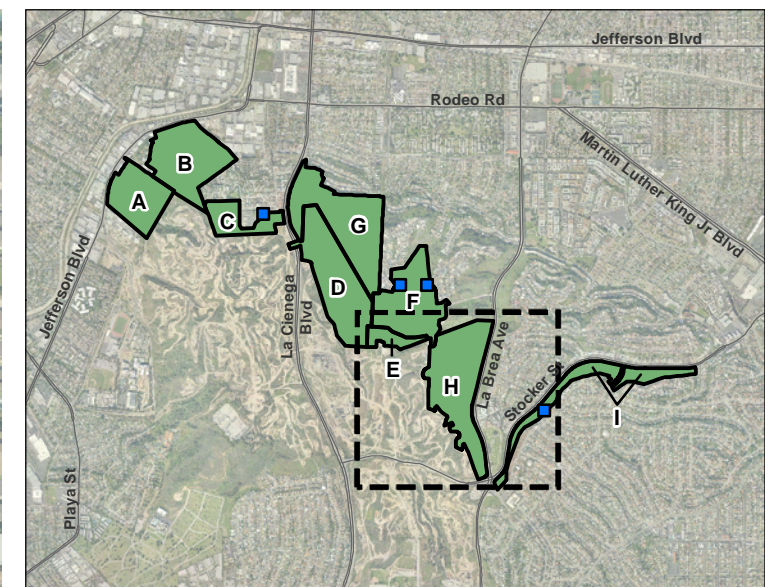


- Project Segments
- Noise Measurement Locations

Exhibit 2-10
Segment G - Western Ridgeline Trail

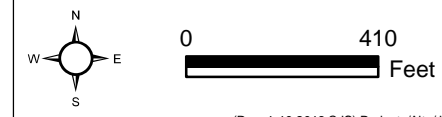


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- Project Segments
- Noise Measurement Locations

Exhibit 2-11
Segment H - Eastern Ridgeline Trail

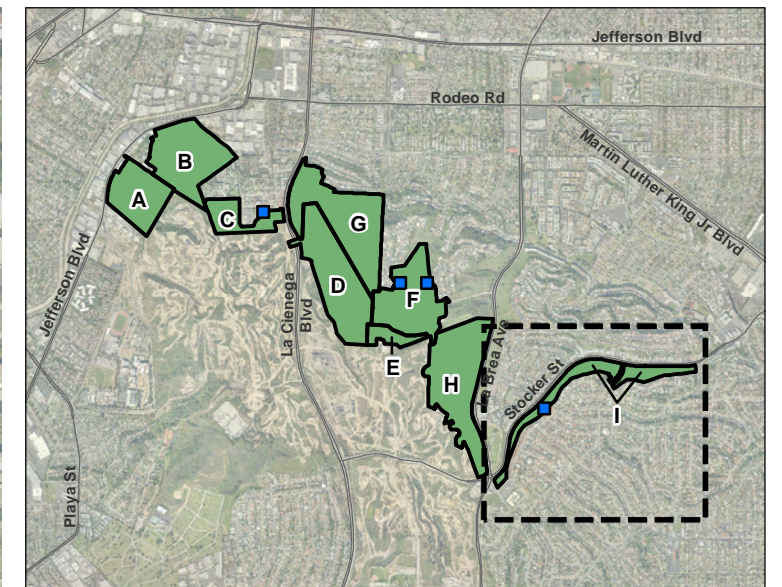


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The Ruben Ingold Park is a local park located on the top of the slope between Stocker Street and Mount Vernon Drive. It is developed with a pedestrian path/track loop, benches, and exercise equipment, and is owned by the County of Los Angeles.

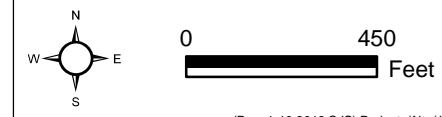
The Stocker Corridor Trail and adjacent school, park, and single-family residences are located on unincorporated Los Angeles County land (i.e., the Windsor Hills community). North-northwest of Stocker Street are Norman Houston Park and multi-family residences on Don Tomaso Drive in the City of Los Angeles. East and south are single-family residences, and west of the trail are the KHSRA and commercial uses at the Five Points intersection (See Exhibit 2-12, Segment I – Stocker Street Corridor).

The Baldwin Hills Conservancy has developed plans to realign two sections of the Stocker Corridor Trail that currently encroach onto private property.



- Project Segments
- Noise Measurement Locations

Exhibit 2-12
Segment I - Stocker Corridor Trail



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SECTION 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; and
- To restore native coastal scrub habitat in existing disturbed or ornamental landscape areas along the trail alignment.

3.2 PROJECT DESCRIPTION

The Proposed Project designates the alignment of the Park to Playa Trail that would lead from the parks in the Baldwin Hills area to the Pacific Coast through the Ballona Creek Bike Path and Marvin Braude Bike Path. The project would include improvements to existing formal and informal trails and development of new trails in the Baldwin Hills area. These improvements would involve resurfacing, widening, and realigning existing and proposed trails; providing fencing, wayfinding signs, trailhead facilities (i.e., an information kiosk, shade structures, benches, bike racks, and trash cans); landscaping with native plants and restoring habitat in disturbed areas adjacent to the trail; and reconstructing sidewalks, crosswalks, bike lanes, and a drainage channel. These improvements would provide trail connections from Ruben Ingold Park, Norman O. Houston Park, the KHSRA, the Baldwin Hills Scenic Overlook, and Culver City Park to the Ballona Creek Bike Path.

The proposed trail improvements would be made along the designated Park to Playa Trail to provide a trail that meets 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 5-foot-wide trail would be provided (with 4-foot widths on steep slopes) to a maximum width of 12 feet. The trail would generally be unpaved, with a firm and stable surface (i.e., native earth, decomposed granite, aggregate road base, or other material suitable to the setting). A paved trail would be provided in areas replacing an existing paved pathway.

The proposed trail has been aligned to minimize the running slope to the extent feasible. The trail would generally have a 3 percent to 5 percent cross slope to the outside/downhill edge to maintain proper drainage. Where the trail is wider than necessary, it would be narrowed and adjacent disturbed areas would be restored with native vegetation.

To promote trail use, a trailhead would be constructed that would include a parking area, signs, bike racks, a map kiosk, trash cans, and benches at the Five Points intersection. Other amenities along the trail would include shade structures, wayfinding signs, art installations, an interpretive node, fencing, and gates. The proposed trail amenities would be constructed of concrete, stone, metal, and other materials that would minimize maintenance needs; deter vandalism; and limit fire damage.

To designate the proposed trail alignment, various signs would be provided at entrances and intersections of the Park to Playa Trail. The signs would not be located intermittently along the trail, but would be concentrated at the trailhead, gateway entrances, and points where intersecting trails meet. Table 3-1 lists the types of trail signs and their general locations.

**TABLE 3-1
PROPOSED TRAIL SIGNS**

Signs	Description	Location
Off-Trail Elements		
<i>Trail Medallion on Park Sign</i>	<i>Trail medallion on an existing, vehicular-scale, park identification sign</i>	<i>Park entrances</i>
<i>Gateway Sign</i>	<i>Vehicular-scale park identification sign</i>	<i>Park entrance at the Five Points intersection</i>
On-Trail Elements		
<i>Map Kiosks</i>	<i>Large displays to orient users through maps, educational, and guidance information</i>	<i>Trailhead and trail gateways</i>
<i>Direction Signs</i>	<i>Signs to guide users to destinations along the trail, which would include destination information (name, distance and direction).</i>	<i>At trail decision points</i>
<i>Juncture Signs</i>	<i>Signs that would guide users to the trail; these signs inform users of use restrictions or trail conditions</i>	<i>Intersecting trail juncture points</i>
<i>Confirmation Signs</i>	<i>Signs that would guide users along the trail and provide mile marker information</i>	<i>Mile markers located every ½ mile and at minor trail junctures</i>

Existing fences along the trails would be planted with vines to block views of adjacent private properties and developments. As part of trail realignment, portions of existing trails would be closed and disturbed areas would be restored with native vegetation. This would involve brush packing; regrading and ripping of compacted surfaces; erosion-control measures; revegetation; and other measures to deter access to closed trails. Habitat restoration would incorporate native species, such as coastal sage scrub and other native trees, shrubs, and grasses or drought-tolerant plants.

To help establish the native plantings, drip irrigation systems would be installed at two locations: the Blair Hills Corridor habitat restoration area and the disturbed areas at the proposed trailhead at the Stocker Corridor Trailhead.

The KHSRA has an existing irrigation system in the developed park areas. The Project would tie into or replace the existing irrigation with a drip system at three locations. At the KHSRA entrance on La Cienega Boulevard, an area of irrigated turf grass would be replaced with a native plant garden with drip irrigation. Similarly, at the eastern end of the Eastern Ridgeline Trail at the Five Points intersection, an irrigated ornamental planting bed would be replaced with a native plant garden with a drip irrigation system. Along the Hilltop Connector Trail corridor, the existing irrigation system would be abandoned and removed, and ornamental landscaping would be replaced with native plantings with a low flow drip irrigation system. Non-irrigated hydroseed would be used in other disturbed areas of the trail corridor.

3.2.1 PHYSICAL CHARACTERISTICS

Proposed improvements along each trail segment are discussed below.

Segment A: Culver City Park

A trail currently runs from the lower parking lot of Culver City Park on Duquesne Avenue to the parking lot and access road in the upper section of this park; around the softball diamond; and toward Hetzler Road at the Baldwin Hills Scenic Overlook. Wayfinding signs are proposed along this trail and along Duquesne Avenue to the west up to the Ballona Creek Bike Path. Exhibit 3-1 shows the proposed trail segment.

Segment B: Connection to Baldwin Hills Scenic Overlook

As part of this Project, wayfinding signs are proposed along the developed trails in this area. In addition, a five-foot-wide natural surface trail is proposed from the hilltop parking area at the southeastern section, winding down east toward the Blair Hills Corridor. Concrete masonry unit (CMU) steps with side railings would be provided beside the switchbacks at the southeastern boundary of this area. The parking area would be used as a staging area for the construction of trail improvements along Segments A, B, and C. Exhibit 3-2 shows the proposed trail segment and associated improvements.

Segment C: Blair Hills Corridor Trail

A six-foot-wide natural surface trail is proposed in the BHRCA property at Blair Hills, extending east from the proposed trail in the Baldwin Hills Scenic Overlook (Segment B) to the boundary of the abandoned school site. The trail would continue south and then turn in an easterly direction toward La Cienega Boulevard. The proposed trail would then head south along La Cienega Boulevard, where retaining walls and a barrier fence would be provided along the western edge of the proposed trail.

An interpretive node is proposed near the southwestern corner of the school site. This node would consist of seat walls, a planting area, and interpretive signage. A connection to the abandoned school (where a future park may be located) is also proposed at the eastern edge of the school property. No gate or opening to the school site is planned as part of this project. This potential future access is intended for foot traffic for trail users who would like to stop off at the future park while walking along the Park to Playa Trail. (The improvements to the school site are not part of the Proposed Project and would be developed at a later date. Analyses on the potential impacts associated with this future park and use of the park as a trailhead to access the Park to Playa Trail will be made as part of the park's CEQA review and compliance after plans for the park are developed. At this time, the existing chainlink fence around the school site will remain, precluding use of the site to access to the Park to Playa Trail.)

The existing dirt access road serving the oil operations would be relocated south of its current location, and 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 and north of the existing dirt road to separate the oil operations and its access road 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. A drip irrigation system would also be provided. Exhibit 3-3 shows the proposed trail segment and associated improvements.

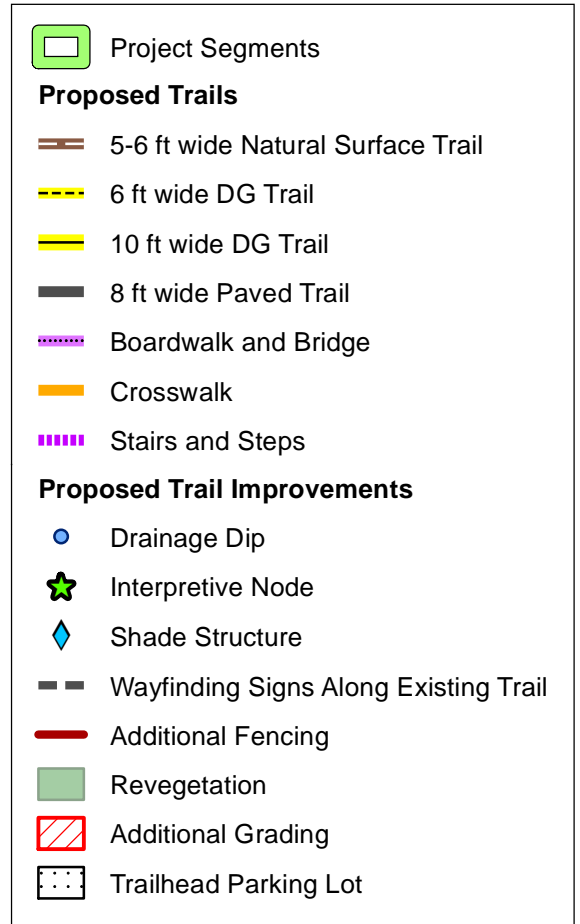
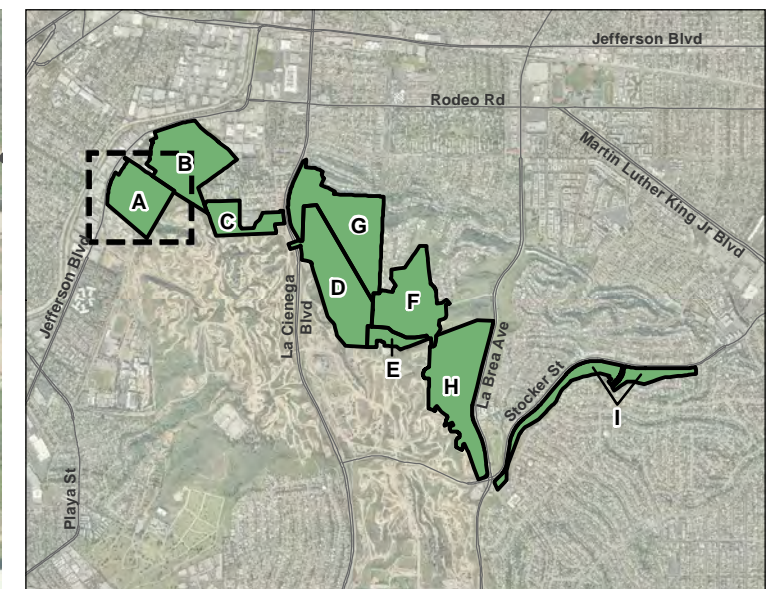
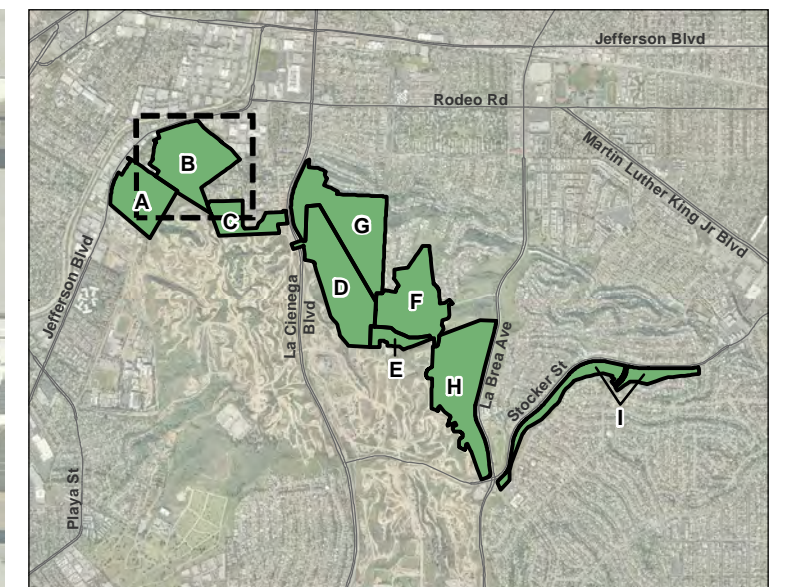


Exhibit 3-1
Improvements to Segment A -
Culver City Park

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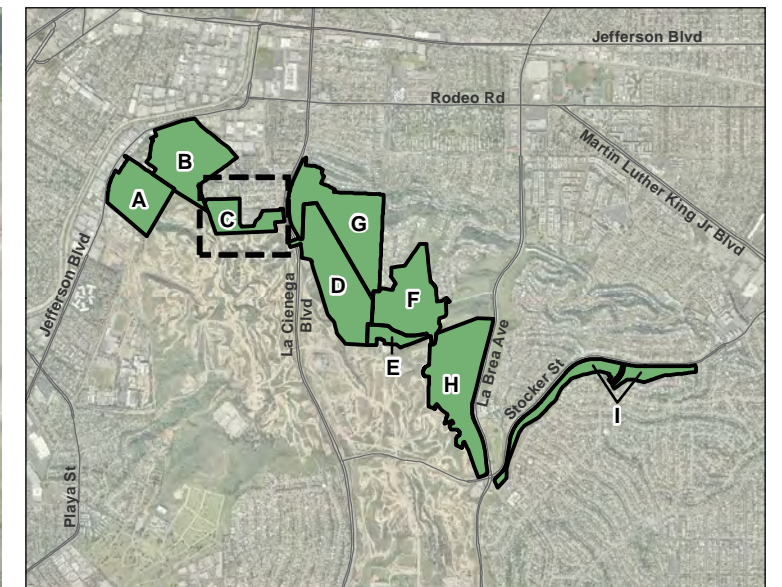


- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- ★ Interpretive Node
- ◆ Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-2
Improvements to Segment B –
Baldwin Hills Scenic Overlook

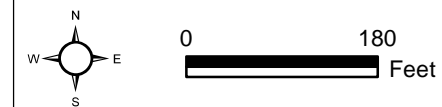
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- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- Interpretive Node
- Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-3
Improvements to Segment C –
Blair Hills Corridor



Segment D: Valley Trail

From the new trail in Segment C, a crosswalk and an enhanced bicycle and pedestrian pathway on the bridge that spans over La Cienega Boulevard is proposed. It is anticipated that the existing 40-foot-wide, 2-lane bridge would be restriped to include a bike lane and a sidewalk or a Class I bike path on the south side of bridge. This bike lane/sidewalk would connect to the KHSRA entrance via new crosswalks and a widened sidewalk.

In the KHSRA, a six-foot-wide decomposed granite (DG) trail with kiosks, footbridges, and a boardwalk is proposed through the landscaped area near the park entrance and up a grassy slope to an existing parking area. A six-foot-wide trail would extend north on the west side of the parking area toward the Japanese Gardens, and a five-foot-wide natural surface trail would extend north to tie into existing hillside trails. Existing adjacent trails would be trimmed of overhanging vegetation and regraded with drain dips. A six-foot-wide DG trail would also extend southeasterly to tie to an existing trail, from which a new DG trail would run along the eastern edge of the parking lot and along the eastern edge of the valley portion of the KHSRA. This segment would be a ten-foot-wide, relatively flat, DG trail running in a southeasterly direction at the toe of the slope and along the edge of developed picnic areas. Picnic tables would have to be relocated away from the proposed trail alignment. Connection of the trail to an existing restroom would also be provided. Exhibit 3-4 shows the proposed trail segment and associated improvements.

Segment E: Hilltop Connector Trail

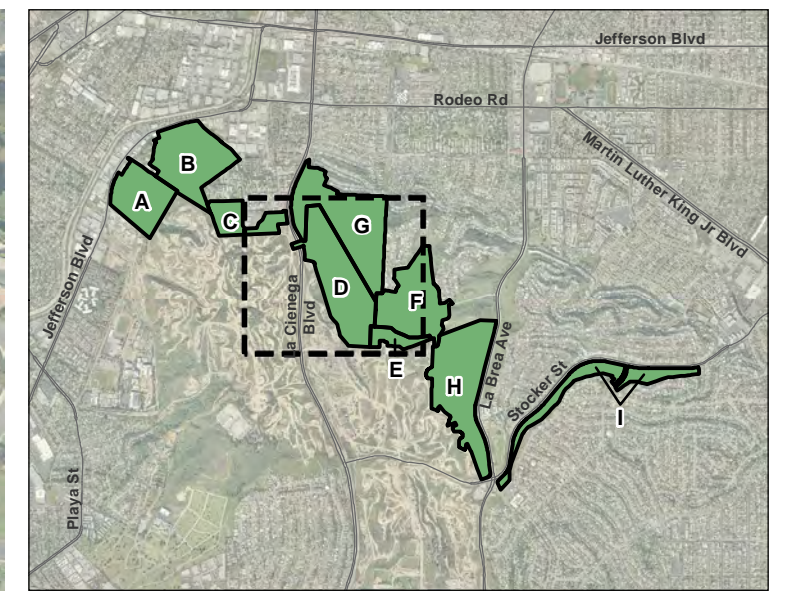
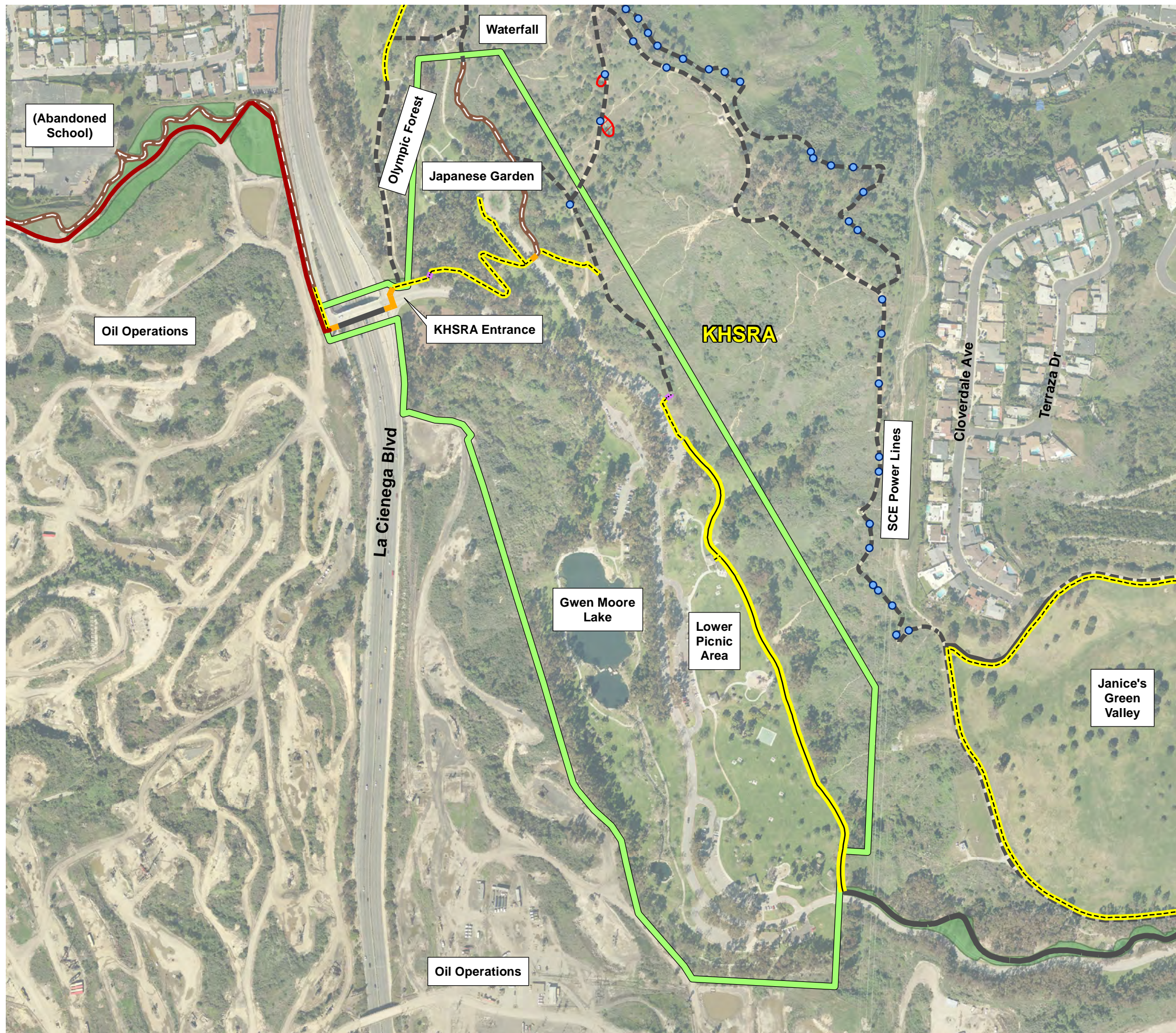
An approximate eight-foot-wide, winding colored concrete sidewalk and paved trail is proposed through the landscaped area adjacent to the park access road in the KHSRA. The proposed trail would run in a southeasterly direction and would replace the existing sidewalk at this location. Also, the existing concrete-lined drainage channel would be replaced with a natural rock channel (reconstructed as a vegetated swale with rock check dams). Ornamental landscaping in this area would be replaced with native coastal scrub vegetation and would involve the removal of eucalyptus trees in selected areas. The existing conventional irrigation system would also be replaced with a drip irrigation system. Exhibit 3-5 shows the proposed trail segment and associated improvements.

Segment F: Janice's Green Valley Loop Trail

An existing paved access road traverses the perimeter of Janice's Green Valley. Parallel to and inside of this access road, a four-foot-wide, DG surface walking/running trail would be provided, along with wayfinding signs and markings. The unpaved portion of the access road along the northern edge of the valley would be paved. At the southeastern edge of the Janice's Green Valley, crosswalks and curb ramps would be provided and a six-foot-wide, DG trail would run on an existing planting strip between two access roads. Exhibit 3-6 shows the proposed trail segment and associated improvements.

Segment G: Western Ridgeline Trail

The Western Ridgeline Trail is an existing trail and fire road that connects to other narrow trails and to the Eastern Ridgeline Trail through the Janice's Green Valley Loop Trail. In selected areas, the existing trail would be regraded to provide drain dips. Adjacent disturbed/denuded areas would be restored back to native habitat. Three existing switchbacks on the northwest portion of the trail would be extended and re-constructed to provide turn gradients that are more compliant with trail design standards. Above the Japanese Gardens, an existing trail that connects to the Waterfall would be re-aligned and the existing split-rail fence replaced and



Project Segments

Proposed Trails

- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps

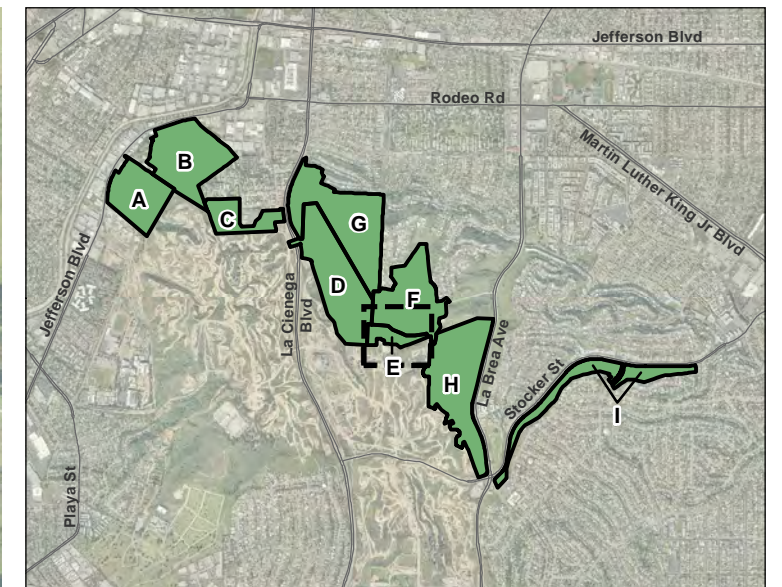
Proposed Trail Improvements

- Drainage Dip
- Interpretive Node
- Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-4
Improvements to Segment D -
Valley Trail

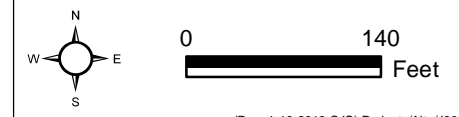
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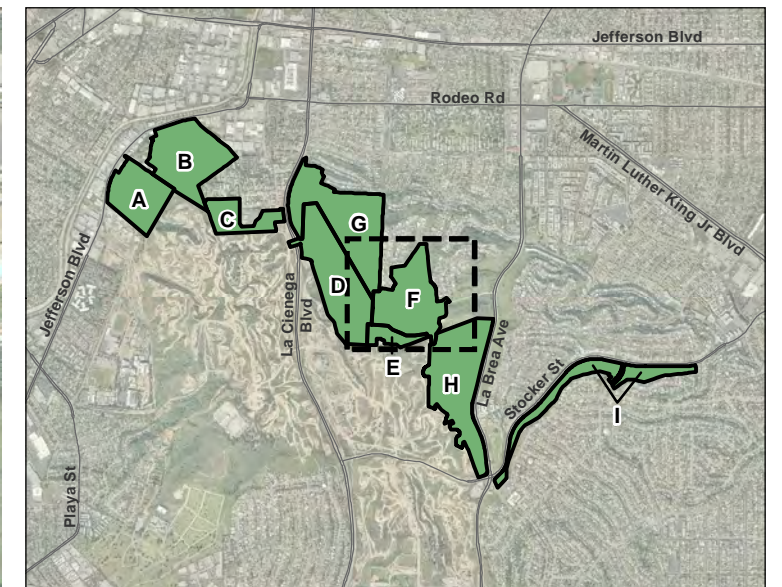
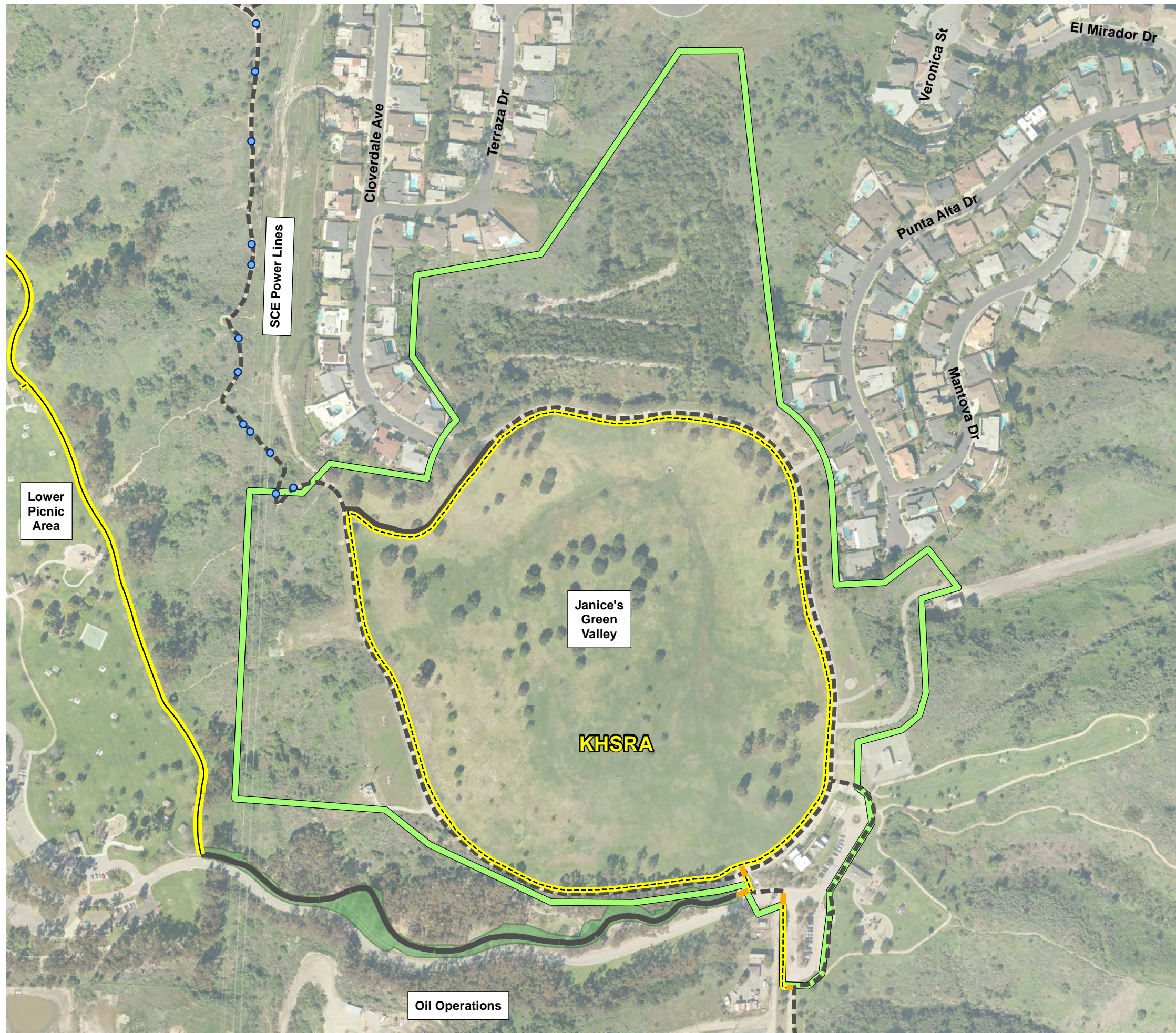


- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- ★ Interpretive Node
- ◆ Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-5
Improvements to Segment E –
Hilltop Connector Trail

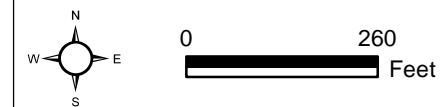


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- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- ★ Interpretive Node
- ◆ Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-6
Improvements to Segment F –
Janice's Green Valley Loop Trail



relocated. At the western edge of the KHSRA, a six-foot-wide DG trail would extend north to a proposed shade structure that would be constructed on the westerly facing slope of the KHSRA. Exhibit 3-7 shows the proposed trail segment and associated improvements.

Segment H: Eastern Ridgeline Trail

Improvements to the Eastern Ridgeline Trail from the Janice's Green Valley Loop Trail to the northwestern corner of La Brea Avenue and Stocker Street are being undertaken by the County Department of Parks and Recreation independent of the Proposed Project.

As part of the Project, wayfinding signs would be provided along the Eastern Ridgeline Trail. In addition, an information kiosk would be constructed at the southern end of this trail at the intersection of La Brea Avenue and Stocker Street. The area around the kiosk would be planted with native plants, and the existing irrigation would be replaced with a drip irrigation system. Exhibit 3-8 shows the proposed trail segment and associated improvements.

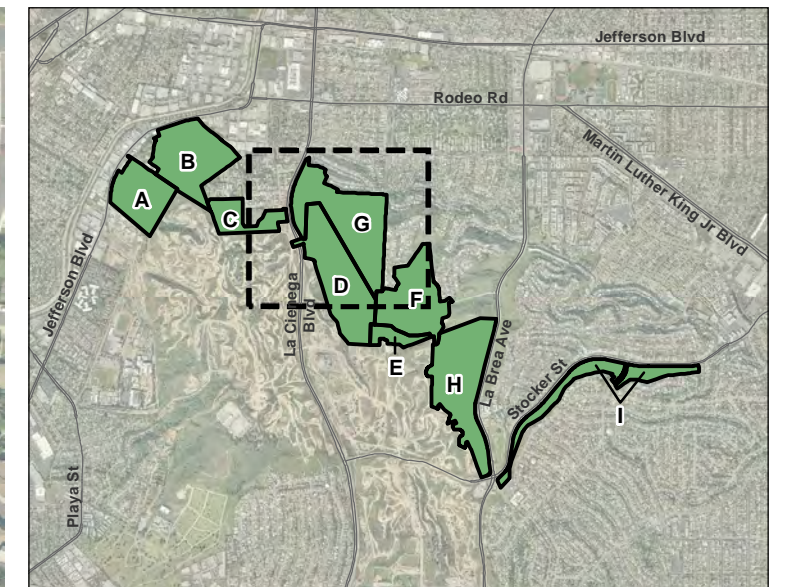
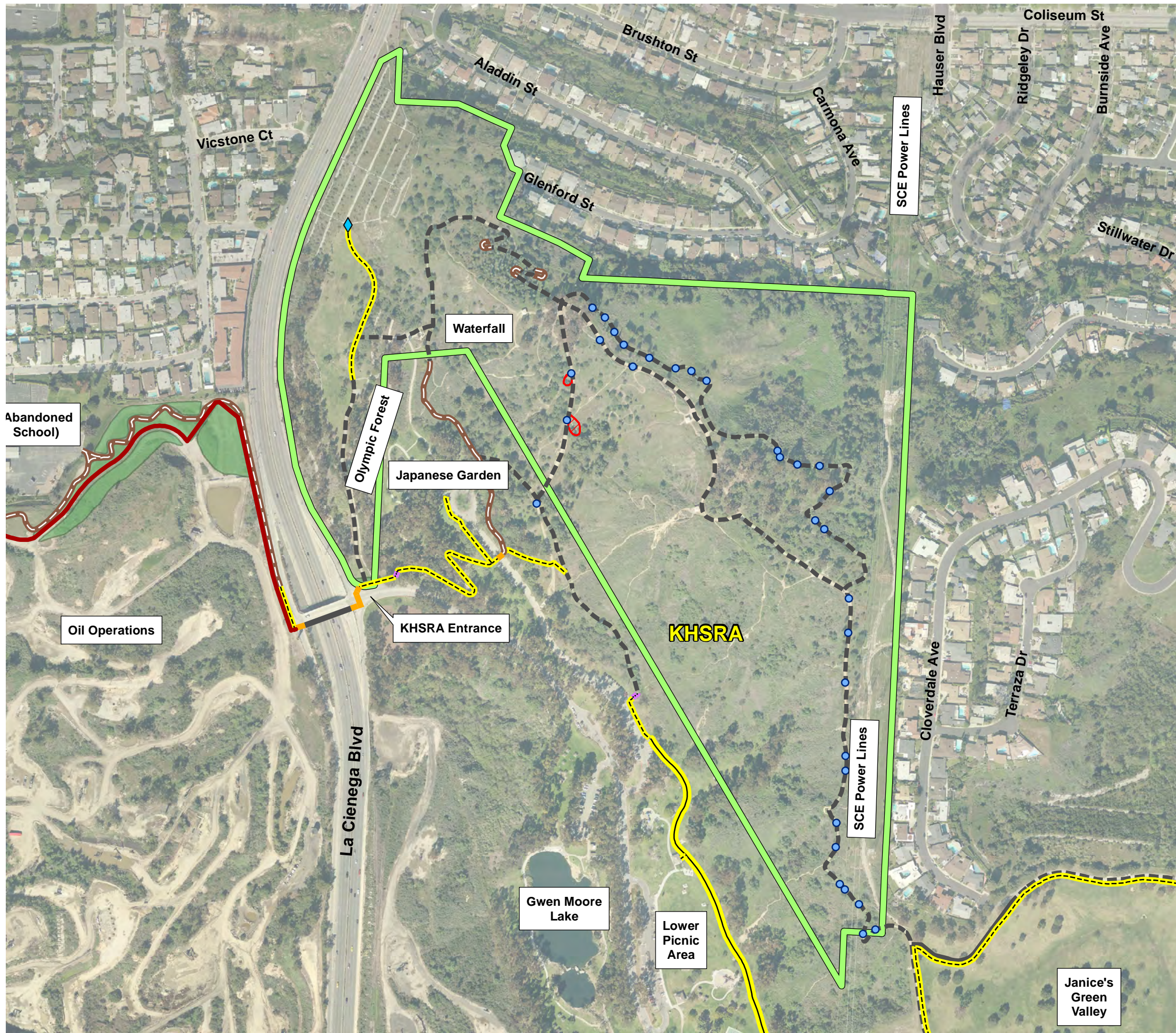
Segment I: Stocker Corridor Trail

To provide better connection to the Eastern Ridgeline Trail, the Proposed Project would add wayfinding signs; trail identity signage; and crosswalk improvements on the northeastern corner of Stocker Street and La Brea Avenue at the Norman Huston Park. A crosswalk would extend south across Stocker Street to a proposed trailhead with a parking area at the southeastern corner of Overhill Drive and Stocker Street. Another crosswalk is proposed from the southwest corner of La Brea Avenue and Stocker Street to the proposed trailhead at the corner of Overhill Drive and Stocker Street.

The trailhead would have a parking area that would be paved with gravel and would accommodate approximately 28 to 50 cars. The parking area would be screened by native plants with a drip irrigation system and would have two entry/exit driveways: one on Overhill Drive and another on Stocker Street. The existing trail from the roadway would be abandoned and two new six-foot-wide DG trails would pass around the parking area to tie into the existing Stocker Corridor Trail. A stairway with a railing and a separate ramp built on engineered fill with a retaining wall would extend up the adjacent slope to the Ruben Ingold Park.

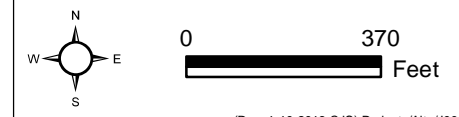
Between Overhill Drive and Valley Ridge Avenue, a short section of the existing trail and adjacent fence would be relocated to avoid an area of slope movement. The existing trail alignment would then be restored with native vegetation. Minor grading and drainage work on the existing trail, an improved crosswalk, and grading improvements to the switchback near Presidio Drive would also be made. Exhibit 3-9 shows the proposed trail segment and associated improvements.

Table 3-2 summarizes the proposed improvements along each segment of the Park to Playa Trail.

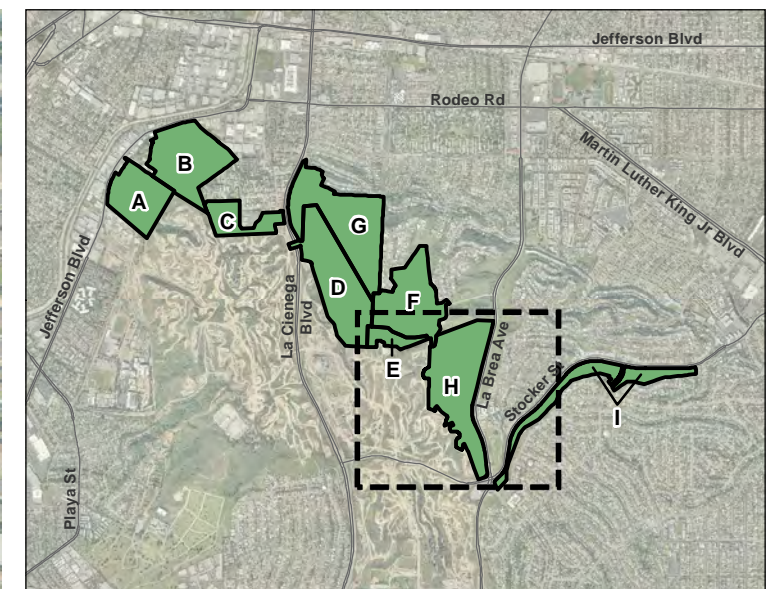


- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- ★ Interpretive Node
- ◆ Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-7
Improvements to Segment G –
Western Ridgeline Trail

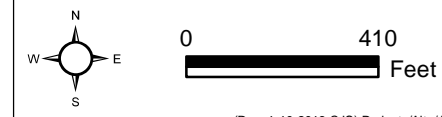


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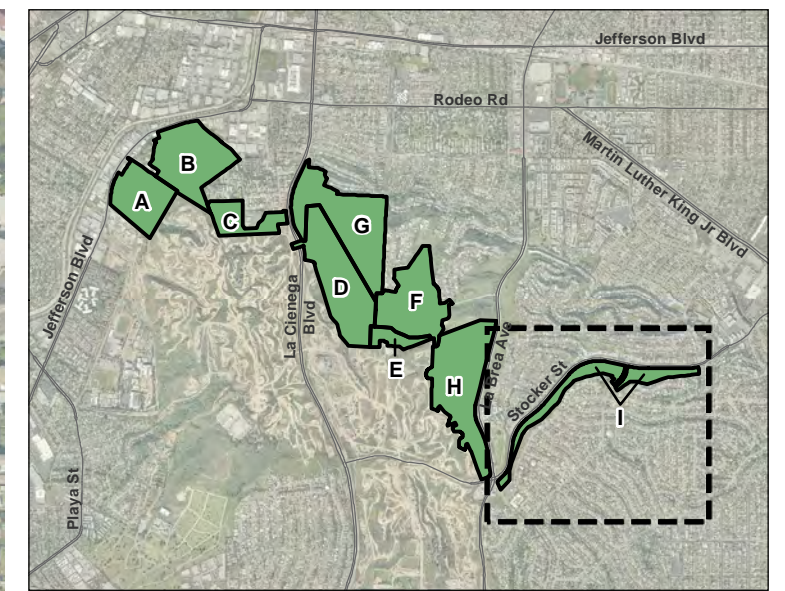


- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- ★ Interpretive Node
- ◆ Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-8
Improvements to Segment H –
Eastern Ridgeline Trail

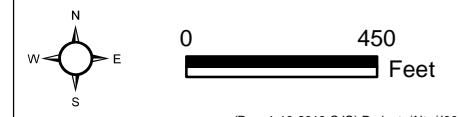


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- Project Segments
- Proposed Trails**
- 5-6 ft wide Natural Surface Trail
- 6 ft wide DG Trail
- 10 ft wide DG Trail
- 8 ft wide Paved Trail
- Boardwalk and Bridge
- Crosswalk
- Stairs and Steps
- Proposed Trail Improvements**
- Drainage Dip
- ★ Interpretive Node
- ◆ Shade Structure
- Wayfinding Signs Along Existing Trail
- Additional Fencing
- Revegetation
- Additional Grading
- Trailhead Parking Lot

Exhibit 3-9
Improvements to Segment I –
Stocker Corridor Trail



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**TABLE 3-2
PROPOSED TRAIL IMPROVEMENTS BY SEGMENT**

Segment Name	Location	Trail Improvements	Gateway/Entrance Improvements	Other Improvements
A: Culver City Park	East of Jefferson Boulevard and along Duquesne Avenue	Wayfinding signs.	–	–
B: Connection to Baldwin Hills Scenic Overlook	East of Jefferson Boulevard	Wayfinding signs, New natural surface trail, CMU steps with railing.	–	–
C: Blair Hills Corridor Trail	BHRCA property on Blair Hills	New natural surface trail, Wayfinding signs, CMU steps with railing, Retaining wall for trail along La Cienega Boulevard.	Abandoned school connection, Connection/entrance at La Cienega Boulevard.	Interpretive node, Shade structure, Native landscaping, Habitat restoration, Access road relocation, New fence, Fence relocation, Water line relocation, Drip irrigation.
D: Valley Trail	In KHSRA	New DG and natural surface trails, Trail repavement, Footbridges, Boardwalk, Wayfinding signs.	Entry sign/kiosk, Crosswalks, Bike lane and sidewalk.	Vegetation trimming, Drain dips, Native landscaping, Replace irrigation, Picnic table relocation.
E: Hilltop Connector Trail	In KHSRA	New concrete trail, Drainage crossings, Wayfinding signs.	–	Drainage channel restoration, Replace irrigation, Tree removal, Native landscaping, Habitat restoration.
F: Janice's Green Valley Loop Trail	In KHSRA	New DG trail, Access road paving, Crosswalks, Curb ramps, Wayfinding signs.	–	–
G: Western Ridgeline Trail	In KHSRA	New DG trail, Trail realignment, Trail maintenance, Drain dips, Switchback reconstruction, Wayfinding signs.	–	Habitat restoration, Native landscaping, Shade structure, Fence relocation.
H: Eastern Ridgeline Trail	In KHSRA	Wayfinding signs .	Entry sign/kiosk.	Native landscaping, Replace irrigation.
I: Stocker Corridor Trail	Slope on Stocker Street	New DG trail, CMU steps, Trail ramp, Wayfinding signs, Trail realignment, Slope stabilization, Fence relocation, Switchback reconstruction.	Trailhead with gravel parking lot, Entry sign/kiosk, Bike racks, Crosswalks, Pavement markings, Benches.	Native landscaping, Habitat restoration, Drip irrigation.

CMU: concrete masonry unit; BHRCA: Baldwin Hills Regional Conservation Authority; KHSRA: Kenneth Hahn State Recreation Area; DG: decomposed granite

3.2.2 CONSTRUCTION ACTIVITIES

As stated earlier, the sidewalk on Hetzler Road; trail realignment; and revegetation in the Baldwin Hills Scenic Overlook (Segment B) are under construction by the State and would be in place before the Park to Playa Trail begins construction. Also, trail improvements on the Eastern Ridgeline Trail (Segment H) are being implemented by the County separately with a tentative construction start date in early 2013. (Environmental review and CEQA clearance for these trail improvements have been completed by the State and County independent of this IS/MND.) Other projects planned by the County, the State, and Culver City on trails in the area are also expected to be in place by the time the first phase of project construction begins.

The Proposed Project would be constructed in phases starting with improvements on Segment A (Culver City Park); Segment I (Stocker Corridor Trail); and KHSRA Segments D, E, F, G, and H (Valley Trail, Hilltop Connector Trail, Janice's Green Valley Loop Trail, Western Ridgeline Trail, and Eastern Ridgeline Trail). These improvements would be constructed starting in June 2013 and are expected to be completed by October 2013.

The second phase of construction would include improvements on Segment B (Connection to Baldwin Hills Scenic Overlook) and Segment C (Blair Hills Corridor Trail), which would begin construction in June 2014 and end in October 2014. Exhibit 3-10 shows the phasing of improvements. However, funding availability, permitting requirements, and other factors may change segment phasing.

Trail segments would be generally kept open when construction on another segment is ongoing, with signs provided to notify users of the temporary closure of the segment and alternative routes that may be used in the mean time. Construction staging areas would be located in parking areas and other paved or highly disturbed areas along the trail segments, in the Baldwin Hills Scenic Overlook, and in the KHSRA.

3.2.3 OPERATIONAL CHARACTERISTICS

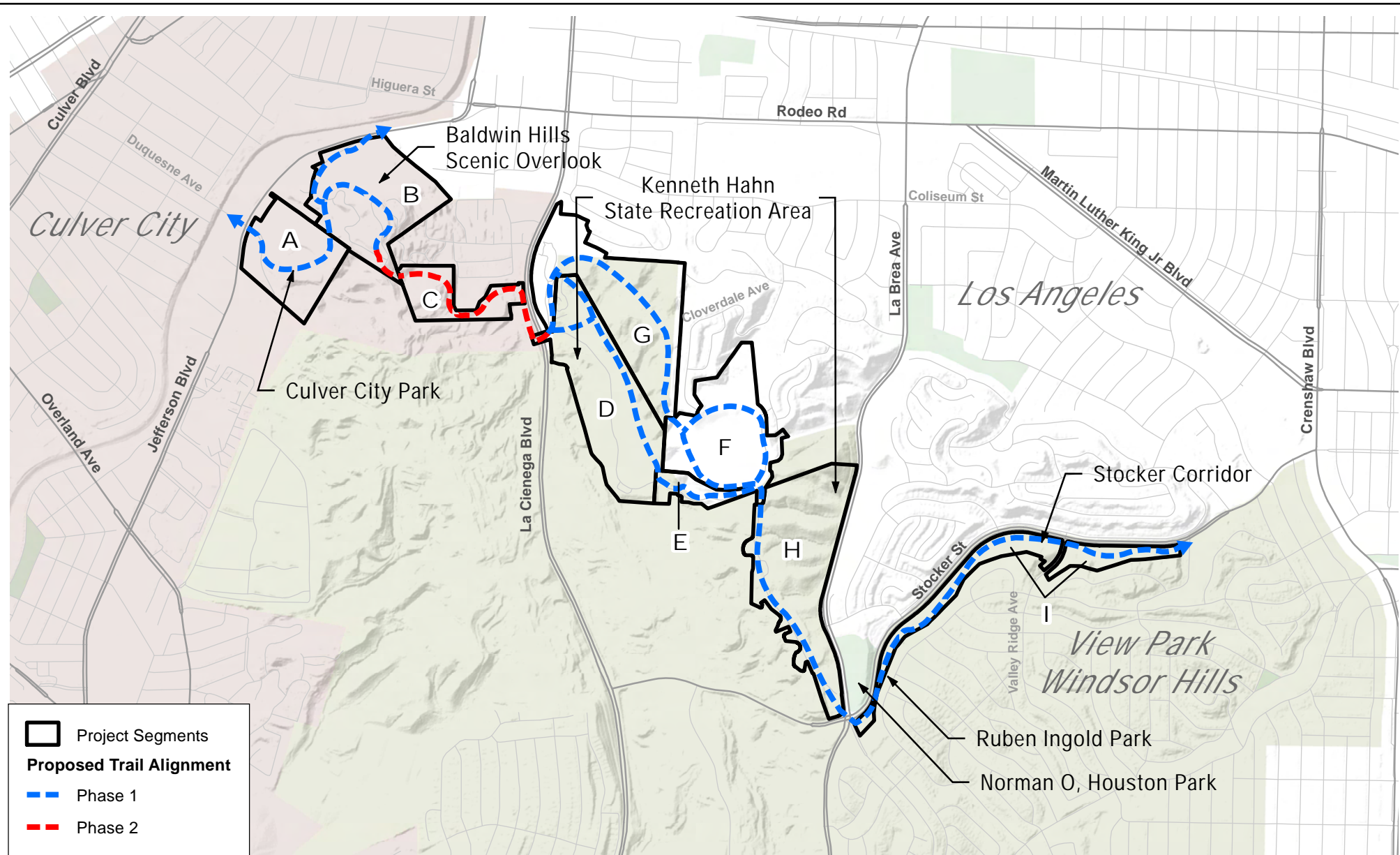
The Park to Playa Trail would be open and accessible at times when the parks are open to public use. Signs are posted stating that the parks are closed from dusk to dawn. This would apply to the Park to Playa Trail and would preclude trail use during the evening and nighttime hours.

It is expected that the same individuals who currently use the trails in the Baldwin Hills area would continue to use the Park to Playa Trail after project construction. These users include walkers, joggers, hikers, bicyclists, dog walkers, roller bladders, and skate boarders, with portions of the trail inaccessible to some users (i.e., handicapped persons, bicyclists, and leashed-dog walkers) due to the presence of stairs, steeper terrain, or other management policies. Equestrians would continue to be prohibited from using the trail.

With improved ADA access and better wayfinding, trail use by area residents and other regional visitors is anticipated to increase over time. With improved connections and signs, existing and future users of the Ballona Creek Bike Path may also be diverted to the Park to Playa Trail through increased familiarity with the Baldwin Hills area and local park amenities.

Maintenance of the existing and proposed trails would continue to be provided by the individual facility owners or management agencies. Maintenance activities would include trash collection; trimming of vegetation; minor repaving of the trail surface; graffiti removal; and repair or replacement of signs, fences, benches, and related trail elements. The proposed signs on Culver City Park and Duquesne Avenue would be maintained by the City of Culver City as part

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Project Segments

Proposed Trail Alignment

- Phase 1
- - - Phase 2

Phasing of Improvements

Park to Playa Trail

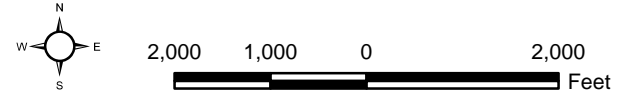


Exhibit 3-10



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of its park maintenance and street maintenance operations. The signs in the Baldwin Hills Scenic Overlook would be subject to maintenance by the California State Parks through State Rangers that are present on site. The trails and trail improvements in the KHSRA and Stocker Corridor Trail would be maintained by the County Department of Parks and Recreation, as provided by the current maintenance crew at the maintenance yard in the park. It is anticipated that no major increase in maintenance activities would occur with the existing and new trails and trail improvements in existing parks and open spaces.

The only new maintenance activity would be along the Blair Hills Corridor (Segment C) where the proposed trail and trail improvements would be maintained by the Los Angeles County Department of Parks and Recreation. The current maintenance crew at the KHSRA would provide maintenance and inspection for the Blair Hills Corridor Trail, as part of the KHSRA park maintenance activities.

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 the improvements proposed on the Park to Playa Trail include:

BHRCA

- Approval of the proposed Park to Playa Trail alignment
- Approval of the proposed trail improvements on BHRCA-owned land in the Blair Hills Corridor

California Department of Parks and Recreation

- Approval of the proposed trail improvements in the Baldwin Hills Scenic Overlook
- Approval of the proposed trail improvements along Stocker Corridor Trail
- Approval of the proposed trail improvements in the KHSRA

County of Los Angeles

- Approval of the proposed trail improvements along Stocker Corridor Trail
- Approval of the proposed trail improvements in the KHSRA
- Approval of bike lane/sidewalk on the bridge over La Cienega Boulevard

City of Los Angeles

- Approval of the proposed trail improvements in the northern section of the KHSRA located within City limits

City of Culver City

- Approval of the proposed signs at Culver City Park and along Duquesne Avenue

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, the County of Los Angeles, and the City of Culver City
- Encroachment permits from the City of Los Angeles, the County of Los Angeles, and the City of Culver City for work within public rights-of-way (i.e., roadways) and from SCE for work in and near SCE right-of-way or easement
- Section 401 Water Quality Certification from the Los Angeles Regional Water Quality Control Board (RWQCB)

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

SECTION 4.0 ENVIRONMENTAL ANALYSIS

This section includes the completed CEQA environmental checklist form, which was used to evaluate the potential environmental impacts of the proposed Park to Playa Trail. The environmental checklist form identifies the degree of impacts from the Proposed Project 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 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 comply with or implement.

1. Project Title: **Park to Playa Trail**
2. Lead Agency Name and Address: Baldwin Hills Regional Conservation Authority
Los Angeles River Center and Gardens
570 West Avenue 26, Suite 100
Los Angeles, California 90065
3. Contact Person and Phone Number: Ana Petrlc
(323) 221-9944 ext.107
4. Project Location: Baldwin Hills area in the Cities of Los Angeles and Culver City and the unincorporated area of Los Angeles County
5. Project Sponsor's Name and Address: Baldwin Hills Regional Conservation Authority
Los Angeles River Center and Gardens
570 West Avenue 26, Suite 100
Los Angeles, California 90065
6. General Plan Designation: see Section 4.10
7. Zoning: see Section 4.10

8. Description of the Project:

The BHRCA is proposing the Park to Playa Trail as a comprehensive trail system from the parks and open space areas in the Baldwin Hills to the Ballona Creek Bike Path, which eventually leads to the Pacific coast. Improvements are proposed on the eastern portion of this trail that goes through the Baldwin Hills area.

9. Surrounding Land Uses and Setting:

Land uses surrounding the proposed trail alignment include public park areas; open spaces; and residential, commercial, and industrial areas. To the north are multi-family and single-family homes, an abandoned school, a park and industrial uses; to the east are parks and single-family homes; to the south are single-family homes, a school, a park, commercial uses, oil drilling operations, and industrial uses; to the west are oil drilling operations and industrial uses. See more detailed discussions in Sections 2.3 and 4.10 of this IS/MND.

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
- California Department of Transportation

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetic/Visual | <input type="checkbox"/> Agriculture and Forest Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> 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

1/14/13

Date

Ana Petric

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.1.1 ENVIRONMENTAL SETTING

Existing Visual Quality

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. However, the proposed trail alignment is at-grade and is not visible from most public streets and areas outside the parks and open spaces where it is located. Intervening structures and trees preclude views of the proposed Park to Playa Trail, except from immediate areas within the parks and open spaces in Baldwin Hills and internal streets. More often, the slopes of the hills are visible from abutting private developments and streets, with the trail discernible when there are people, bikes, or dogs on the trail. Aboveground structures (i.e., signs, fences, and steps) on the trail are visible from within the parks, but distant locations only provide views of the vegetated hills; the bare ground with oil wells and associated equipment; the power transmission towers through the KHSRA and along La Cienega Boulevard; the water tanks on Blair Hills; and several communication towers on the ridgelines.

Existing Views

Users of the public parks and open spaces have views of the adjacent residential, commercial, and industrial land uses, as well as of the recreational areas and open spaces in the Baldwin Hills. Oil production areas are visible from the ridgelines at the KHSRA and the Blair Hills. The Baldwin Hills Scenic Overlook area and the Eastern and Western Ridgeline Trails at 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, the Hollywood Hills, the Verdugo Hills, the San Gabriel Mountains, and the Santa Ana Mountains).

Scenic Highways

There are no designated State Scenic Highways near the project area. 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 farther northwest

(Caltrans 2007). The nearest segment to the Baldwin Hills area is the intersection of SR-1 with SR-187, which is located approximately 3.8 miles west of Culver City Park.

The County Scenic Highway Element identifies Pacific Coast Highway as a First Priority Route – proposed for further study (County of Los Angeles 1980). The Baldwin Hills are not visible from Pacific Coast Highway due to distance and the presence of intervening structures.

The City of Los Angeles Transportation Element designates Venice Boulevard and Crenshaw Boulevard as Scenic Highways (City of Los Angeles 1999). Venice Boulevard is located 0.6 mile west of Culver City Park, and Crenshaw Boulevard is located 0.4 mile east of the eastern end of the Stocker Corridor Trail. La Brea Avenue and Stocker Street are identified as Adopted Scenic Highway Study Corridors in the draft *West Adams-Baldwin Hills-Leimert Community Plan* (City of Los Angeles 2012c).

Existing Trail Segments

The existing visual character of the proposed trail alignment varies throughout its 7.0-mile length, as shown in the photographs provided in Exhibits 4-1 through 4-9.

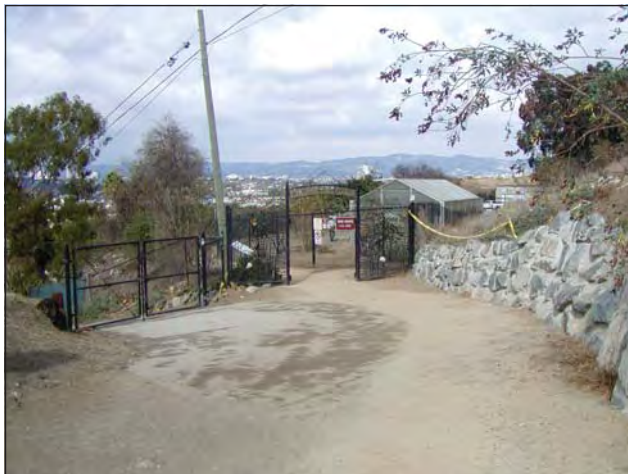
- **Segment A: Culver City Park.** A paved sidewalk on Duquesne Avenue connects the Ballona Creek Bike Path to Culver City Park. Duquesne Avenue winds up to the game fields on the top of the hill. From the lower parking lot east of Duquesne Avenue, a trail made of wooden bridges and walkways switches back and forth heading up the hill to the upper parking lot and baseball field. Adjacent to the field are three softball fields. A dirt trail starts behind the eastern field and heads north to a gated entrance to the trail leading to the Baldwin Hills Scenic Overlook. Photographs of the Culver City Park are provided in Exhibit 4-1.
- **Segment B: Baldwin Hills Scenic Overlook.** Entry to the Baldwin Hills Scenic Overlook is provided by Hetzler Road as it winds up to the top of the hill, 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 and a visitor center at the top. Views of the surrounding communities, the Los Angeles Basin, and the Pacific Ocean are available from the overlook. Photographs of the Baldwin Hills Scenic Overlook are provided in Exhibit 4-2.
- **Segment C: Blair Hills Corridor.** The Baldwin Hills Scenic Overlook slopes down toward the Blair Hills Corridor, which is an undeveloped area located south of a residential area in Culver City, north of the Inglewood oilfield, and west of La Cienega Boulevard. The northwest section of this area 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 winding around an abandoned school 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 this area and into a storm drain inlet near La Cienega Boulevard. Photographs of the Blair Hills Corridor are provided in Exhibit 4-3.



Looking east at the sidewalk on Duquesne Avenue at Ballona Creek Bike Path



Looking north at the connection to the trail from the lower parking lot



Looking north at the existing trail going into Baldwin Hills Scenic Overlook



Looking east at the existing trail within Culver City Park

Existing Views of Segment A – Culver City Park

Exhibit 4-1

Park to Playa Trail

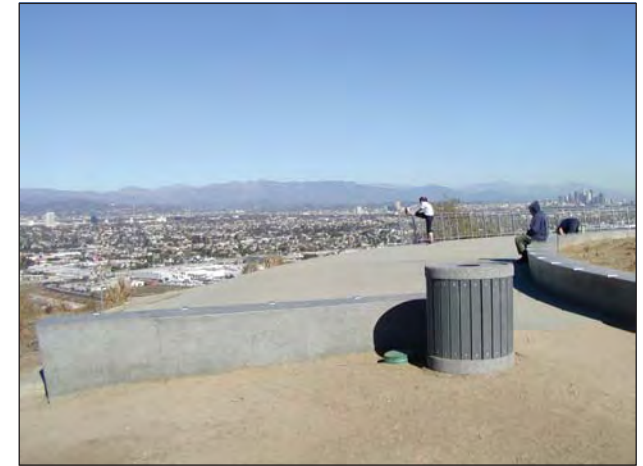




Looking west at the existing trail leading to Observation Deck



Looking west at Hetzler Road as it leads into the overlook



Observation deck at the top of the hill



Looking east at the slope at southeastern corner



Looking south at the steps leading to the top of the hill



Looking south at the Visitors Center

Existing Views of Segment B – Baldwin Hills Scenic Overlook

Exhibit 4-2

Park to Playa Trail





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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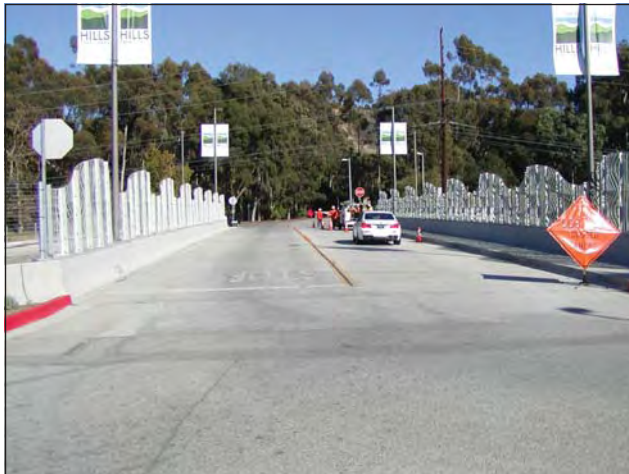
Existing Views of Segment C – Blair Hills Corridor

Park to Playa Trail

Exhibit 4-3

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- **Segment D: Valley Trail.** 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 this area leading to various facilities within the park. A mix of native and ornamental plants and numerous mature trees are found throughout the KHSRA in this area. Photographs of the proposed alignment for the Valley Trail are provided in Exhibit 4-4.
- **Segment E: Hilltop Connector Trail.** From the valley area, the KHSRA access road extends farther east and up toward the upper areas of the KHSRA. Along the road is a paved sidewalk that also leads to the top. A drainage channel runs parallel along the left side of access road and sidewalk. Near the top of the hill, the sidewalk veers away from the road and passes by a picnic area surrounded by trees. At the eastern end of the access road is a parking lot. Photographs of the access road and sidewalk in this area are provided in Exhibit 4-5.
- **Segment F: Janice's Green Valley Loop Trail.** At the top of the hill at the KHSRA is a relatively flat area known as Janice's Green Valley. This area is defined by a perimeter road, which is largely paved, except for a short section in the northwestern area that remains unpaved. A radio transmission building is located to the southeast, and a meeting room and playground are farther southeast. Photographs of the road around Janice's Green Valley, where the trail would run parallel, are provided in Exhibit 4-6.
- **Segment G: Western Ridgeline Trail.** The Western Ridgeline Trail includes a paved trail near the entrance to the KHSRA at La Cienega Boulevard. Near the off-ramp and park entrance, the trail heads north and runs parallel to La Cienega Boulevard to an open field. A dirt trail leads to a wooden staircase that leads up toward the ridge to a waterfall. Several paved and unpaved trails are present in this area. The paved trail is approximately four feet wide and is surrounded by trees and overgrown bushes and overhanging trees. The trail makes a sharp turn as it heads southeast and uphill, steeply toward the ridge. At the top of the ridge, the trail widens to an approximate 12-foot-wide dirt road that runs parallel to Glenford Street. Several shade structures are found along the trail/dirt road. The trail/dirt road continues along the ridgeline and heads south, parallel to power transmission lines and Cloverdale Avenue. The dirt road then narrows to a four-foot-wide trail that ties into the northwestern corner of Janice's Green Valley. Views of the surrounding areas and the Los Angeles Basin are available from this trail. Photographs of the Western Ridgeline Trail are provided in Exhibit 4-7.
- **Segment H: Eastern Ridgeline Trail.** From the KHSRA's upper parking lot, a paved access road heads south toward a maintenance yard then becomes a dirt road along the ridgeline along the KHSRA boundary. East of the dirt road is a slope that drops down toward La Brea Avenue where several dirt trails cut through. From the ridgeline, a trail runs east toward La Brea Avenue at its intersection with Don Lorenzo Drive, where steps and a gateway are present. Before the dirt road reaches the Five Points intersection, it makes a U-turn and heads back north along La Brea Avenue to the service entrance at the northeastern corner of the KHSRA. Views of the surrounding residential and industrial areas are available from this trail. Photographs of the Eastern Ridgeline Trail are provided in Exhibit 4-8.



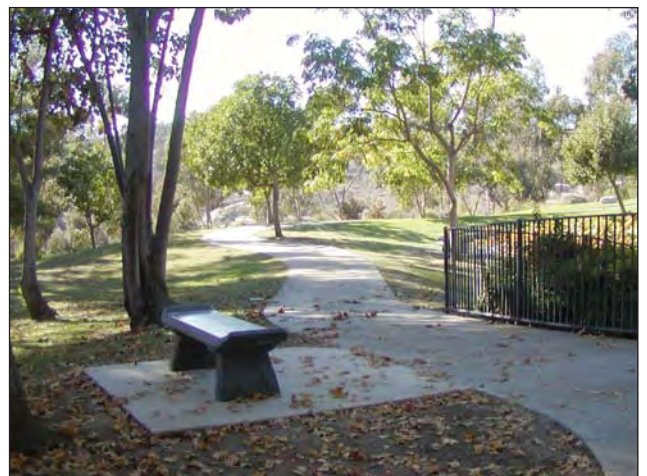
Looking east at the bridge over La Cienega Boulevard



Looking northeast at the dirt trails from the Japanese Garden parking lot



Looking south at the eastern edge of the lower picnic area



Looking north at the walkway near the Japanese Gardens

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Existing Views of Segment D – Valley Trail

Park to Playa Trail

Exhibit 4-4

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Drainage channel



KHSRA access road



Picnic tables along sidewalk



Sidewalk along access road

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Existing Views of Segment E - Hilltop Connector Trail

Exhibit 4-5

Park to Playa Trail

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Looking southeast at the northeastern section of the access road



Looking east at the northwestern section of the access road



Looking south at the southeastern section of the access road



Looking north at the western section of the access road

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Existing Views of Segment F – Janice’s Green Valley Loop Trail Exhibit 4–6

Park to Playa Trail

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Looking north at the access road under SCE power lines



Looking east at the existing shade structure along the trail



Looking north at the switchback on the existing trail



Looking east at the existing trail along ridgeline



Looking north at the paved trail east of La Cienega Boulevard



Looking east at the waterfall on the western section of the trail

Existing Views of Segment G – Western Ridgeline Trail

Park to Playa Trail

Exhibit 4-7





Looking south at the northern segment of the access road



Looking northeast at the northwestern corner of La Brea Avenue and Stocker Street



Looking southeast at the trail leading down to La Brea Avenue



Looking north at the upper parking area

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Existing Views of Segment H – Eastern Ridgeline Trail

Exhibit 4-8

Park to Playa Trail



- **Segment I: Stocker Street Corridor.** The Stocker Street Corridor starts at the Five Points intersection and runs northeasterly along the southeast side of Stocker Street. A dirt lot at the southeastern corner of Overhill Drive and Stocker Street is surrounded by white wooden fencing and features a dirt trail, an information kiosk, a trash can, and a bench. The Windsor Hills Elementary School and Ruben Ingold Park are located on a terrace above the dirt lot. The trail heads northeasterly mid-slope of the setback area between the street and single-family residences at the top. It narrows to four feet where there are eroding surfaces, loose gravel, and uneven surfaces; the adjacent slope supports trees, bushes, and grasses. Views of multi-family residences to the north are available from this trail. Exhibit 4-9 includes photographs of various areas along the Stocker Corridor Trail.

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 offer 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.

During construction activities on individual trail segments, the trails would be closed to public use. During this closure, panoramic views and scenic vistas from affected sections of the existing trails would not be available to trail users. This impact would be temporary and is not considered significant. No permanent change to the views from the proposed trail alignment would occur.

As construction activities are ongoing on select segments located near public roadways (e.g., La Cienega Boulevard, Jefferson Boulevard, La Brea Avenue, and Stocker Street), public views of the nearby open space areas would change and may include disturbed soils; construction equipment and vehicles; staging areas; grading; and excavation activities. This impact would also be temporary and is not considered significant.

In the long term, the proposed trail improvements would be mostly visible to trail users and park users and other individuals who are present near each improvement.

Segment A: Culver City Park. Park visitors and employees at the Culver City Park would see new signs along the existing trail at this park and on Duquesne Avenue. These visual changes would not be significant and adverse.

Segment B: Baldwin Hills Scenic Overlook. Trail users, park visitors, and employees at the Baldwin Hills Scenic Overlook would see a new trail; steps at the southeastern corner of this scenic overlook; and signs along the existing trails in this area. Since there are existing trails and steps in this scenic overlook, the visual changes would not be significant and adverse.

Segment C: Blair Hills Corridor. Residents of the apartment building on Lenawee Avenue and residents at upper story windows of residences on Stoneview Drive would see the proposed trail in the Blair Hills Corridor. While the trail improvements would improve the visual quality of the 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



Looking west at the east end of the trail at Presidio Drive



Looking east at the western section of the existing trail



Looking northeast at the trail at Valley Ridge Avenue



Looking east at the west end of the trail at Overhill Drive

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Existing Views of Segment I – Stocker Corridor Trail

Exhibit 4-9

Park to Playa Trail

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not the trail itself. However, a fence would be provided between the new trail and oil wells, and existing block walls separate the adjacent residences from the Blair Hills Corridor and the proposed trail alignment. Thus, no direct views into the yards of private residences would be available. Distance and the difference in elevation between the trail and the second-story windows would also preclude direct views into the interior of the adjacent residences.

Native vegetation would be provided along the eastern section of the new trail. While the plants would block views into adjacent residences, they would also block views of the trail, as seen by nearby residents. At the same time, distant views of the residents could 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 serve 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). Compliance with Regulatory Requirement (RR) 4.1-1 below would prevent the obstruction of views from residential properties near the Blair Hills Corridor.

Segment D: Valley Trail. Park visitors and employees at the lower picnic areas and Japanese Garden of the KHSRA would see the proposed Valley Trail and improvements along existing trails in the area. Again, these visual changes would not be considered significant and adverse.

Segment E: Hilltop Connector Trail. Park visitors and employees at the KHSRA along the Janice's Green Valley Loop Trail and lower picnic areas would see the proposed Hilltop Connector Trail and improvements along the trail. Since this paved trail would replace an existing sidewalk, these visual changes would not be considered significant and adverse. Rather, the native landscaping and drainage channel restoration would provide a more natural look to the area.

Segment F: Janice's Green Valley Loop Trail. Park visitors and employees at the KHSRA in and near Janice's Green Valley and upper picnic areas would see the signs and a new natural surface trail beside the paved access road around the valley. Adjacent residents may see these improvements from their second-story windows where trees do not block views. However, these visual changes would not be considered significant and adverse.

Segment G: Western Ridgeline Trail. Users of the Western Ridgeline Trail would see improvements to this trail as it is realigned, repaved, and improved and as adjacent areas are revegetated with native plants. Residences to the north and east of this trail are not expected to notice any major change as the trail is existing, and there are numerous trees between these nearby homes and the trail.

Segment H: Eastern Ridgeline Trail. No major changes in the visual quality of the area would occur with the proposed signs along the Eastern Ridgeline Trail and the kiosk at the eastern end.

Segment I: Stocker Corridor Trail. Aside from trail users, the adjacent viewers of Segment I include residents on Don Tomaso Drive that would have views of the Stocker Corridor Trail from their parking areas and upper story windows; students, teachers, and employees at the play courts of the Windsor Hills Elementary School; and park users at Ruben Ingold Park and Norman Houston Park who would have views of the proposed trail and trailhead at the corner of Stocker Street and Overhill Drive. The views of these adjacent users would slightly change as a trailhead, new trails, and steps become visible. These visual changes would improve visual quality, as the parking area would be screened with native plants; disturbed areas would be

revegetated; and the trail would be better defined. This impact would not be considered significant and adverse.

While individuals at areas and developments adjacent to the trail alignment would experience permanent changes in long-term views, the changes would be mainly at-grade or limited in size and at scattered locations. Thus, they would not be considered substantial obstructions to existing scenic views of or from the Baldwin Hills. Most viewers would only perceive the new trailhead because of the new parking area and signs, with minor trail relocation, slope stabilization, and crosswalks within their immediate viewsheds.

Views of a trail improvement would not limit visibility of the rest of the improvements in a particular trail segment, nor would viewers see the entire Park to Playa Trail. The visual changes perceived by viewers would be limited due to the size and type of improvements, in comparison to the rest of the landscape. Therefore, visual changes experienced by viewers would not be considered an adverse impact on the scenic resources in the Baldwin Hills. Also, persons located farther from the proposed improvements would have limited views of the trail improvements and would not readily perceive visual changes associated with the Project.

The Proposed Project would improve the trail experience of existing and future trail users through consistent design, improved accessibility, better wayfinding, and aesthetic treatments. Thus, the Proposed Project would have beneficial impacts to the views of both trail and park users, and changes to the existing visual quality of the Park to Playa Trail and surrounding area and on views of the Baldwin Hills would be less than significant.

b) No Impact

There are no State-designated or State-eligible scenic highways located near the proposed trail alignment that may be affected by the proposed trail improvements. Due to distance and intervening urban development, the project area is not adjacent to or visible from Pacific Coast Highway, which is the nearest eligible State Scenic Highway and a County Scenic Highway. The trail 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 analysis of visual impacts focuses on the nature and magnitude of changes in the visual character and quality of the proposed trail alignment and its surrounding area due to implementation of the Proposed Project. This analysis includes visual compatibility with surrounding uses and views from public (not private) vantage points where visual changes would be evident.

The existing visual character of the proposed trail alignment would change from construction of the proposed trail improvements. Existing views would be affected by short-term construction activities on each trail segment, and would include views of disturbed soils, construction equipment and vehicles, and staging areas; grading and excavation activities; and construction of proposed trail amenities and landscaping. These impacts to the visual quality of the area would be short-term and temporary, and would not be considered significant.

Implementation of the Park to Playa Trail would alter the visual character of the trail alignment, but would be considered beneficial impacts to the visual character of the area. As shown in the project plans (Exhibits 3-1 through 3-9 in Section 3.0 of this IS/MND), the Proposed Project would formalize a set of trails in the area through uniform signage, map kiosks, pavement

markings, and other amenities that would create a sense of identity for the Park to Playa Trail. In addition, the Project would restore eroded segments; would widen narrow trails/narrow wide trails; would realign steep sections; and would cross over drainages. Access to the trails would be improved by the construction of a trailhead and gateway, crosswalks, and a bike/pedestrian path. Also, fencing, information kiosks, an interpretive node, shade structures, and other improvements are proposed to improve the trail user experience. While these would change visual quality along select sections of the Park to Playa Trail, they have been designed to improve the trail and thus, would not degrade the existing visual character.

The revegetation of disturbed areas and habitat restoration in the KHSRA, Blair Hills Corridor, and Stocker Corridor would also improve the visual character of the project area by providing trail users with a more natural environment and by expanding the green space that provides urban relief in the Baldwin Hills area for adjacent residents.

Views from vehicles on the surrounding streets would change as signs, crosswalks, and a trailhead are constructed at the edge of public rights-of-way, but revegetation of portions of the dirt lot and slope sections, as well as the consistent design of the trail amenities, would improve the aesthetic character of Segment I.

Therefore, while there would be visual changes as a result of the Proposed Project, these changes would not substantially degrade the visual character or quality of the Baldwin Hills and surrounding areas. Therefore, the Proposed Project would result in less than significant adverse impacts during construction, as it relates to changes in visual character or quality, and no permanent and significant adverse changes to visual quality would occur.

d) No Impact

The Proposed Project would not include the installation of new light sources along the Park to Playa Trail alignment. Also, the proposed trail improvements would not be constructed of reflective materials, such as glass, mirrors, or glazing materials that may cause glare. No change in lighting levels at existing parks would occur with the Project. Therefore, the Project would not result in new sources of light and glare, and there would be no impact.

4.1.3 MITIGATION PROGRAM

Regulatory Requirements

RR 4.1-1 In accordance with Chapter 9.12 of the Culver City Municipal Code, the views of existing property owners near Segment C (Blair Hills Corridor) shall be preserved and protected from obstruction by tree growth. Landscaping and landscape maintenance in this area shall preserve the existing views of adjacent property owners through initial tree selection to future trimming, thinning, crown reduction, topping, and/or removal of trees to prevent the obstruction of views.

The Baldwin Hills Regional Conservation Authority (BHRCA) shall include this RR in the landscaping plans and as a note in the Contractor Specifications. The Contractor shall comply with this regulation during landscape installation and maintenance activities at the Blair Hills Corridor Trail.

Mitigation Measures

With compliance with RR 4.1-1, the Proposed Project would not result in potentially significant adverse impacts related to aesthetics; therefore, no mitigation is required.

4.2	<u>AGRICULTURE AND FORESTRY RESOURCES</u>	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.2.1 ENVIRONMENTAL SETTING

Farmland

The Baldwin Hills 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 Baldwin Hills or along the proposed trail alignment. 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 sections of Los Angeles County (where the proposed trail would be located), this area was not included in the mapping effort by the FMMP (FMMP 2011). As such, there are no designated farmlands in or near the Baldwin Hills.

Forests

While there are numerous mature trees in the KHSRA and other areas in the Baldwin Hills, these trees are not used for growing or harvesting timber. Thus, the project area is not considered timberland.

The project area is not designated as Forests in the Fire and Resource Assessment Program by the California Department of Forestry and Fire Protection (CAL FIRE 2003). 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, which housed the Olympic athletes 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 in the KHSRA do not represent a forest.

4.2.2 IMPACT ANALYSIS

a, b, e) No Impact

While Segments D, E, G, and H (Valley, Hilltop Connector, Western Ridgeline, and Eastern Ridgeline Trails) are located in areas zoned by the County as Heavy Agriculture, there are no agricultural uses in these segments. The proposed trail improvements would not directly convert agricultural land to non-agricultural uses because there are no agricultural activities or FMMP-designated Farmland in or near the Baldwin Hills or along the proposed trail alignment. Additionally, the trail alignment and the surrounding areas are not under a Williamson Act Contract. The Proposed Project 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 Baldwin Hills and the proposed trail alignment 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 the proposed trail improvements. Although eucalyptus trees would be removed along the proposed Hilltop Connector Trail, these trees do not form a forest. 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 PROGRAM

Regulatory Requirements

None.

Mitigation Measures

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

4.3	<u>AIR QUALITY</u>	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), inhalable particulate matter with a diameter of 10 microns or less (PM₁₀), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), 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 ^c	24 Hour	–	35 µg/m ³	Same as Primary
	AAM	12 µg/m ³	15 µg/m ³	Same as Primary
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)		

O₃: ozone; µg/m³– micrograms per cubic meter; PM10: large particulate matter; AAM: Annual Arithmetic Mean; PM2.5: fine particulate matter; CO: carbon monoxide; mg/m³: milligrams per cubic meter; NO₂: nitrogen dioxide; SO₂: sulfur dioxide; ppm: parts per million; km: kilometer; –: No Standard.

^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.

^c In December 2012, the USEPA announced a reduction of the federal annual PM2.5 standard from 15 micrograms per cubic meter (ug/m³) to 12 ug/m³.

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

Source: CARB 2012a.

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 “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
PM ₁₀	Nonattainment	Serious Nonattainment ^a
PM _{2.5}	Nonattainment	Nonattainment
CO	Attainment	Attainment/Maintenance
NO ₂	Nonattainment	Attainment/Maintenance
SO ₂	Attainment	Attainment
Lead	Nonattainment/Attainment ^b	Nonattainment/Attainment ^b
All others	Attainment/Unclassified	No Standards

O₃: ozone; PM₁₀: large 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; CO: carbon monoxide; NO₂: nitrogen dioxide; SO₂: sulfur dioxide.

^a On April 10, 2010, CARB requested that the USEPA designate the SoCAB as an attainment area for the PM₁₀ Federal standard. The USEPA has not acted upon the request.

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

Source: CARB 2012b.

4.3.2 IMPACT ANALYSIS

a) No Impact

The SCAQMD *Final 2007 Air Quality Management Plan* (AQMP) is the air quality plan that was adopted by the SCAQMD on June 1, 2007. The 2007 AQMP is an update to the 2003 AQMP and incorporates new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools. The California Air Resources Board (CARB) approved the plan when the State Strategy for the State Implementation Plan (SIP) was adopted on September 27, 2007.

On November 28, 2007, CARB submitted a SIP revision to the USEPA for O₃, PM_{2.5}, CO, and NO₂ in the SoCAB; this revision is identified as the “2007 South Coast SIP”. The 2007 AQMP/2007 South Coast SIP demonstrates attainment of the federal PM_{2.5} standard in the SoCAB by 2014 and attainment of the federal 8-hour O₃ standard by 2023. The SIP also includes a request to reclassify the O₃ attainment designation from “severe” to “extreme”. The USEPA approved the redesignation effective June 4, 2010. The Extreme designation requires the attainment of the 8-hour O₃ standard in the SoCAB by June 2024. CARB approved PM_{2.5} SIP revisions in April 2011 and O₃ SIP revisions in July 2011. The USEPA approved 3 of

the 5 PM_{2.5} SIP requirements on January 9, 2012, and has approved 47 of the 62 O₃ SIP requirements (USEPA 2012a).

The 2012 AQMP is a regional and multi-agency effort between SCAQMD, CARB, the Southern California Association of Governments (SCAG), and USEPA. 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 2012 AQMP was approved by the SCAQMD Governing Board in December 2012 (SCAQMD 2012a, 2012b).

The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State air quality standards. For a project to be consistent with the AQMP, the pollutants emitted from the project should not exceed the SCAQMD CEQA air quality significance thresholds or cause a significant impact on air quality. As shown in Response 4.2(b) below, pollutant emissions from the Proposed Project would be less than the SCAQMD thresholds and would not result in a significant impact. Further, because the Proposed Project does not involve a General Plan Amendment or zone change, it does not represent a new development that may be unanticipated in the growth and development forecasts used in the AQMP. Therefore, the Project would not conflict with the AQMP and there would be no impact.

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
PM ₁₀	150 pounds/day	150 pounds/day
PM _{2.5}	55 pounds/day	55 pounds/day
VOC: volatile organic compounds; NOx: nitrogen oxides; CO: carbon monoxide; SOx: sulfur oxides; PM ₁₀ : 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 2011b.		

Construction Emissions

Construction of the proposed trail improvements in Segments A, D, E, F, G, H, and I is anticipated to start in June 2013, with completion anticipated by October 2013. Construction of improvements in the southeastern section of Segment B and of Segment C is expected to start in June 2014, with completion anticipated by October 2014. Site preparation and grading would require the export of approximately 1,347 cubic yards of 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; and asphalt paving. Paving would occur on approximately 2,700 square feet.

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; vehicles used to transport construction materials; and from operation of vehicles driven to and from the site by construction workers. Project-generated construction emissions were estimated using the California Emission Estimator Model (CalEEMod) Version 2011.1.1 computer program (SCAQMD 2011a), 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 of Construction	VOC	NOx	CO	PM ₁₀	PM _{2.5}
Emissions (pounds/day)					
2013	2	15	11	2	1
2014	1	11	8	1	1
<i>SCAQMD Thresholds</i>	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 Source: SCAQMD 2011b (thresholds); CalEEMod data in Appendix A.					

As shown in Table 4-4, construction-related emissions generated by the Proposed Project would be less than the SCAQMD regional thresholds of significance. Therefore, construction emissions would be less than significant and mitigation is not required. Compliance with SCAQMD Rule 403 is required, but is not necessary to avoid a potentially significant adverse impact.

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 NO₂, CO, PM₁₀, and PM_{2.5} are examined based on SCAQMD’s localized significance thresholds (LST) methodology. To assess the local air quality impacts of development 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 remain for 1 hour for NO₂ and CO exposure and 24 hours for PM exposure. The lookup tables emission limits are based on the AAQS listed in Table 4-1. The closest receptors to the proposed trail alignment are the various residences near the trail alignment. Users of the trails would also be short-term receptors.

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	15	10	1	1
LST Thresholds (1-acre site; 25-meter receptor distance)	74	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 Areas 1. Central Los Angeles County and 2. Northwest Coastal Los Angeles County.				
Source: SCAQMD 2009 (thresholds). CalEEMod data in Appendix A.				

As shown in Table 4-5, the local emissions from construction of the Proposed Project would be less than 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). Examples of major stationary sources are electric power plants, phosphate processing plants, pulp and paper mills, and municipal waste combustors. Minor sources include most 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

With respect to the Proposed Project, there would be no new trip generation (in that there would be no measureable increase in vehicle trips that would be attributed only to the use of the proposed trail; and maintenance would be provided by existing KHSRA site personnel). As such, there would be no Project-related mobile-source emissions. The Proposed Project would not generate stationary-source emissions or area-source emissions. Therefore, there would be no Project-related operational mass emissions.

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 Proposed Project is not expected to result in new trip generation, nor would the Project cause changes in peak hour traffic volumes. Thus, local intersections would not be affected by the Proposed Project, and there would be no impacts resulting in or contributing to CO hot spots.

With regard to local criteria pollutant emissions associated with the Proposed Project, as discussed above, no new on-site stationary sources are proposed as part of the Park to Playa Trail. As such, no localized operational impacts from criteria pollutants would occur.

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 TACs include industrial manufacturing processes; automotive repair facilities; and dry cleaning facilities. Since the Proposed Project would not include such uses, the Project does not warrant a health risk assessment. 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 South Coast Air Basin is a nonattainment area for O₃, NO₂, PM₁₀, and PM_{2.5}.³ The Proposed Project would generate these pollutants during the construction of trail improvements. As shown in Table 4-4 above, construction emissions would not approach 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. Since the surrounding area is largely developed and there are no nearby vacant parcels, no construction projects are expected within a few hundred yards of the proposed trail alignment that would occur concurrently with the Proposed Project. The construction of the Eastern Ridgeline Trail and improvements at the Baldwin Hills Scenic Overlook are expected to be completed before the Park to Playa Trail is constructed. Construction of the County park in the Blair Hills area is not expected any time soon. Therefore, construction emissions of non-attainment pollutants would not be cumulatively considerable and project impacts would be less than significant.

d) Less than Significant Impact

As described in Response 4.2(b) above, the Proposed Project would not result in any substantial CO hotspot or TAC air pollution impacts, and emissions would be less than the conservative LST emissions thresholds. Therefore, the Proposed Project would not expose any nearby sensitive receptors to substantial pollutant concentrations. As such, the Proposed Project would have less than significant impacts on sensitive receptors. No mitigation is required.

³ 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.

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; food processing; or other activities that generate unpleasant odors.

Construction equipment and activities may generate odors. Potential construction odors may be generated by diesel exhaust emissions, painting, and paving operations. There may be situations where construction activity odors would be noticeable by local residents, park users, and other nearby users and passersby, 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 MITIGATION PROGRAM

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; and limiting vehicle speeds and wind barriers, among others. Compliance with this rule will result in a reduction in short-term particulate pollutant emissions.

The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation during construction activities.

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.

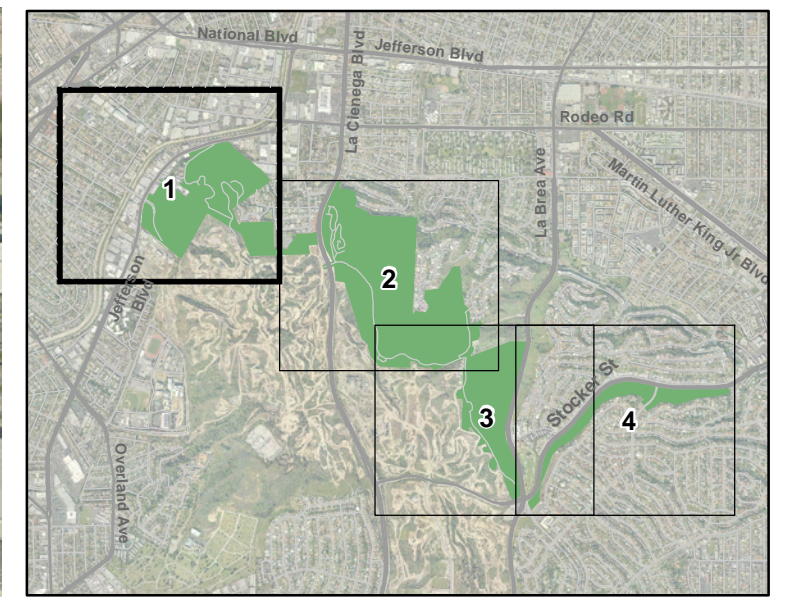
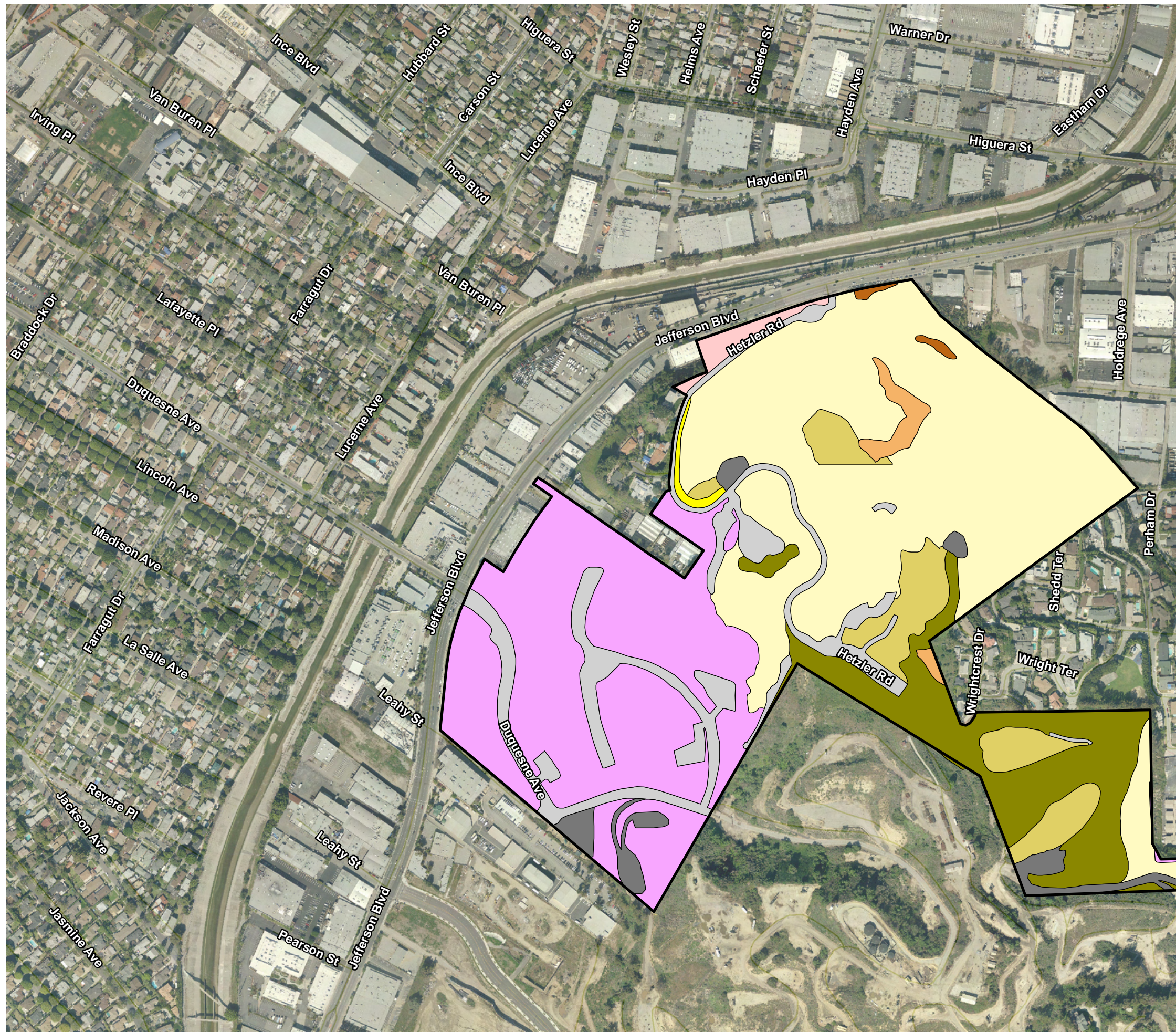
4.4 <u>BIOLOGICAL RESOURCES</u>	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.4.1 ENVIRONMENTAL SETTING

A general biological resources survey was conducted for the Park to Playa Trail in April 2012 by BonTerra Consulting biologists. In addition, special status plant surveys were conducted in April and June 2012, and California gnatcatcher focused surveys were conducted in May and June 2012. A Jurisdictional Assessment was also conducted in October 2012. The findings of these surveys are provided below, as summarized from the Biological Technical Report that is provided in Appendix B (BonTerra Consulting 2012a).

Vegetation

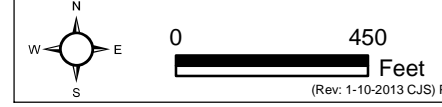
Vegetation types on and near the trail alignment include Annual Brome Grasslands, California Sagebrush – California Buckwheat Scrub, California Sagebrush – California Buckwheat Scrub / Toyon Chaparral, Coast Live Oak Woodland, Elderberry Scrub, Eucalyptus Grove, Giant Wild Rye Grassland, Holly-Leaved Cherry Stand, Toyon Chaparral, and Willow Thickets. Open Water, Ornamental, Ruderal, Developed, and Disturbed areas are also present. Table 4-6 shows the acreage for each vegetation type along the trail alignment that were subject to biological surveys, and Exhibits 4-10 shows the general location of each vegetation type. Descriptions of each vegetation type are provided after the table.



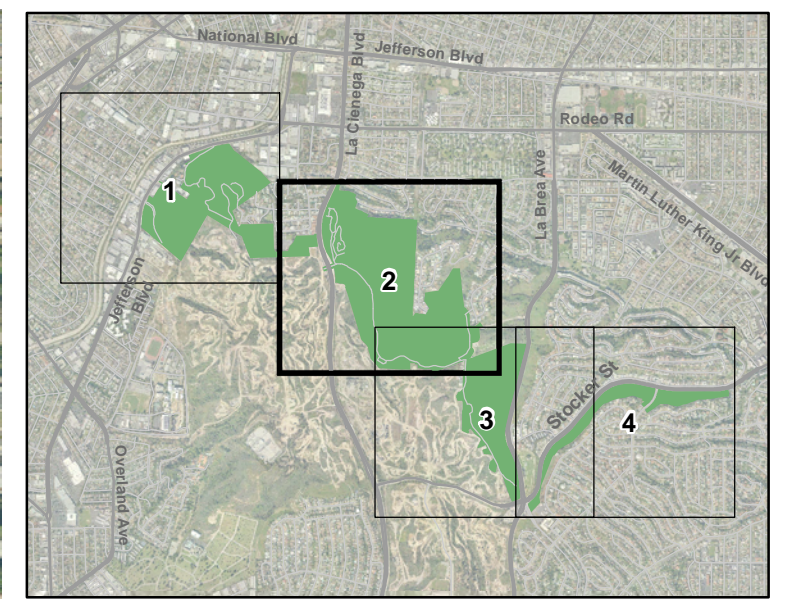
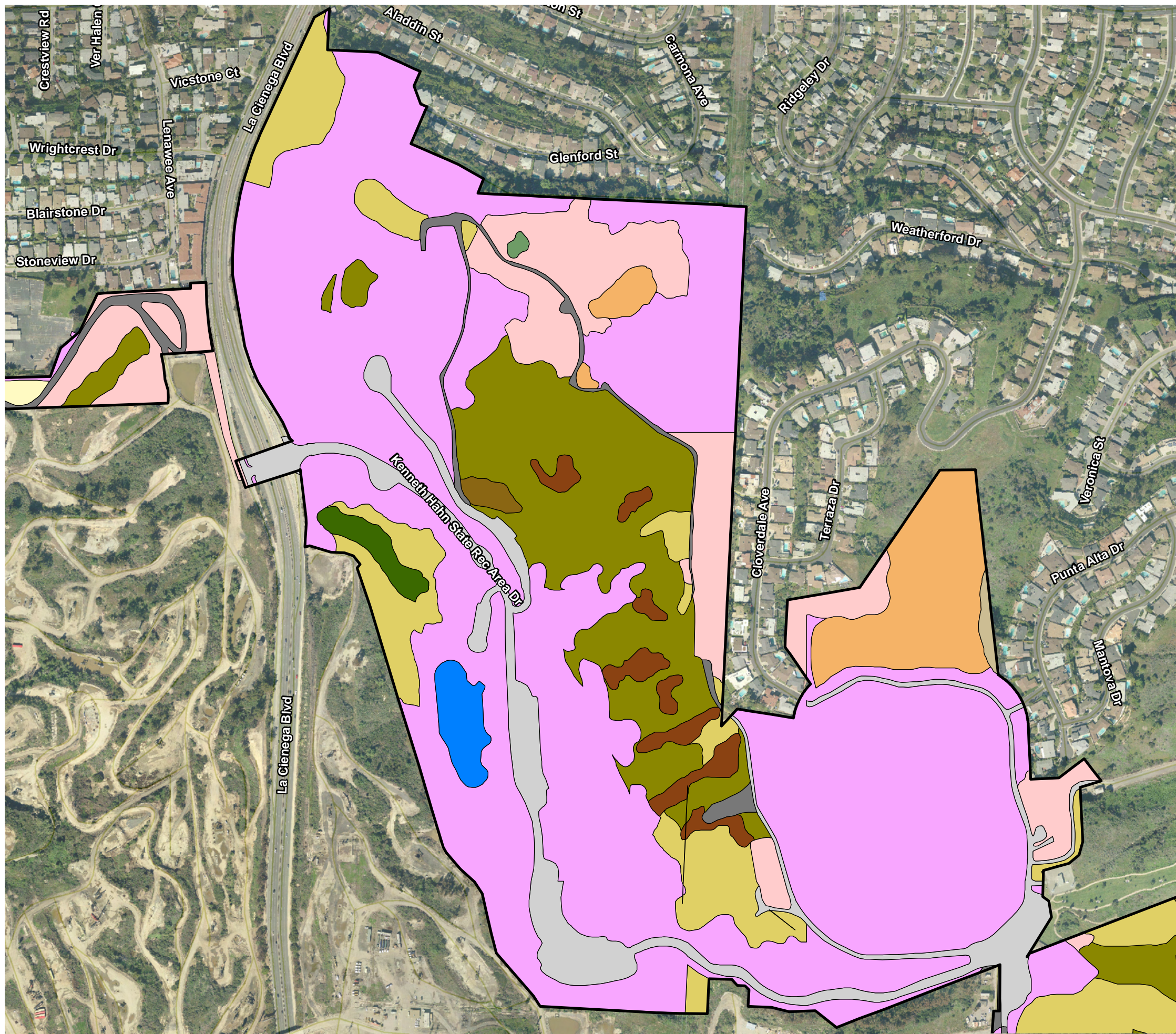
-  Project Boundary
- Vegetation Types and Other Areas**
-  Annual Brome Grasslands
-  California Sagebrush-California Buckwheat Scrub
-  California Sagebrush-California Buckwheat Scrub/Disturbed
-  California Sagebrush-California Buckwheat Scrub/Toyon Chaparral
-  Coast Live Oak Woodland
-  Developed
-  Disturbed
-  Elderberry Scrub
-  Eucalyptus Grove
-  Giant Wild Rye Grassland
-  Holly-Leaved Cherry Stand
-  Open Water
-  Ornamental
-  Ruderal
-  Toyon Chaparral
-  Toyon Chaparral/Disturbed
-  Willow Thickets

Exhibit 4-10A
Vegetation Types and Other Areas

Park to Playa Trail

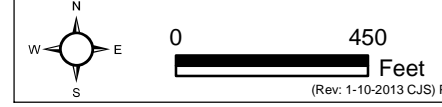


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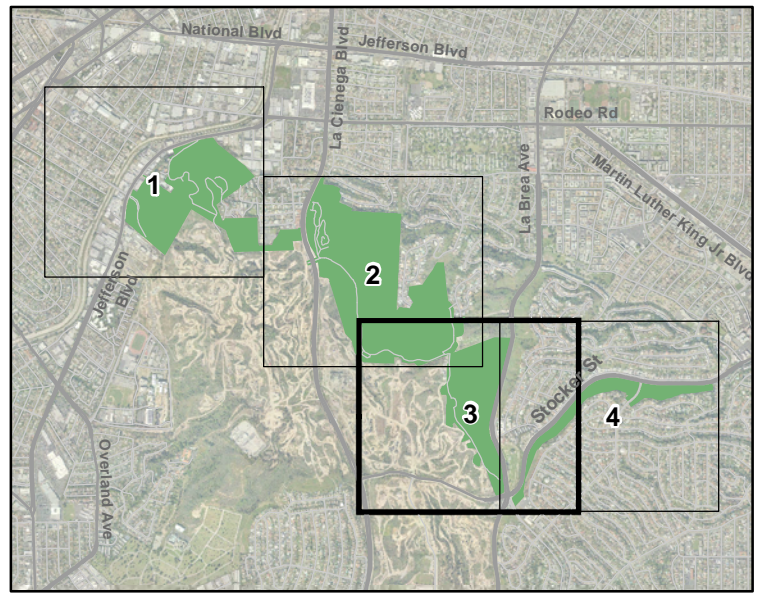
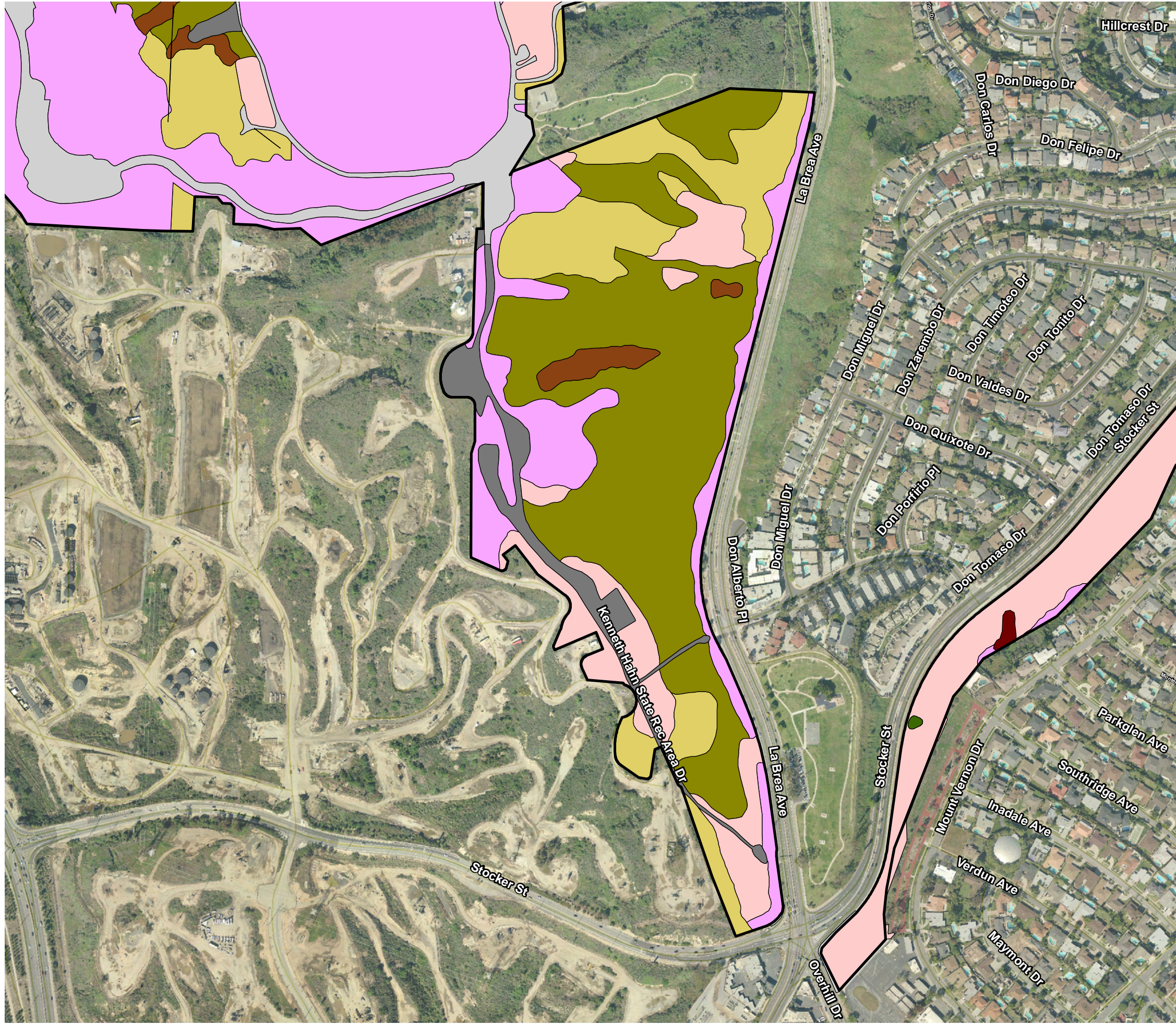
- Project Boundary
- Vegetation Types and Other Areas**
- Annual Brome Grasslands
- California Sagebrush-California Buckwheat Scrub
- California Sagebrush-California Buckwheat Scrub/Disturbed
- California Sagebrush-California Buckwheat Scrub/Toyon Chaparral
- Coast Live Oak Woodland
- Developed
- Disturbed
- Elderberry Scrub
- Eucalyptus Grove
- Giant Wild Rye Grassland
- Holly-Leaved Cherry Stand
- Open Water
- Ornamental
- Ruderal
- Toyon Chaparral
- Toyon Chaparral/Disturbed
- Willow Thickets

Exhibit 4-10B
Vegetation Types and Other Areas
 Park to Playa Trail



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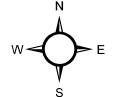
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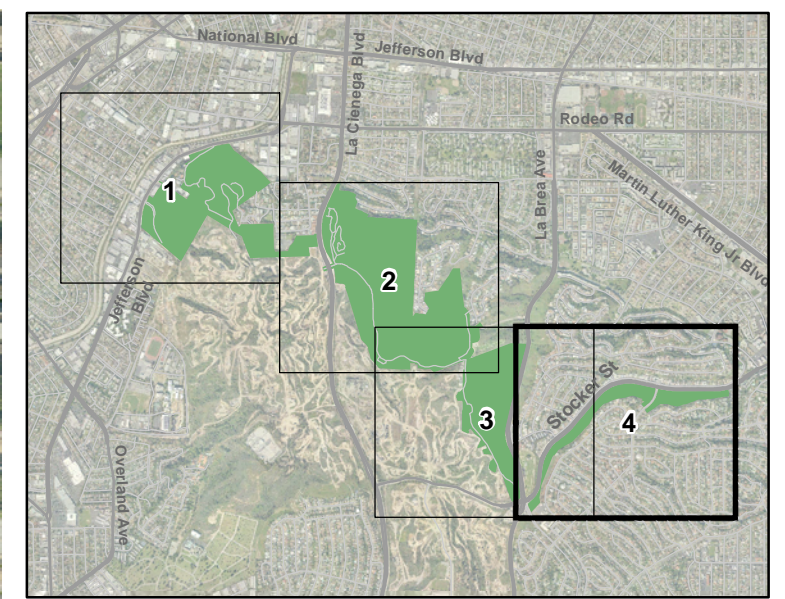
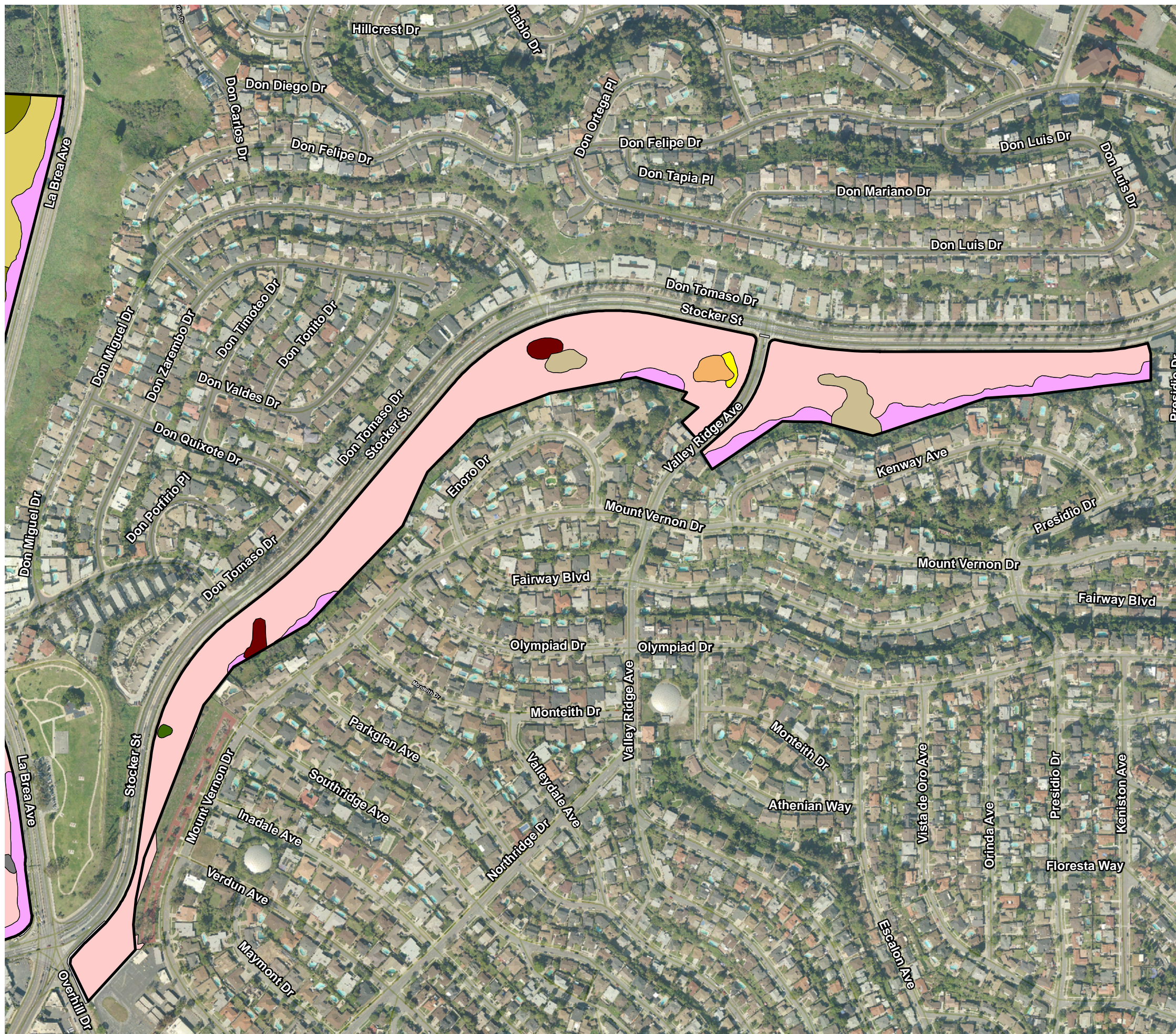
-  Project Boundary
- Vegetation Types and Other Areas**
-  Annual Brome Grasslands
-  California Sagebrush-California Buckwheat Scrub
-  California Sagebrush-California Buckwheat Scrub/Disturbed
-  California Sagebrush-California Buckwheat Scrub/Toyon Chaparral
-  Coast Live Oak Woodland
-  Developed
-  Disturbed
-  Elderberry Scrub
-  Eucalyptus Grove
-  Giant Wild Rye Grassland
-  Holly-Leaved Cherry Stand
-  Open Water
-  Ornamental
-  Ruderal
-  Toyon Chaparral
-  Toyon Chaparral/Disturbed
-  Willow Thickets

Exhibit 4-10C
Vegetation Types and Other Areas

Park to Playa Trail



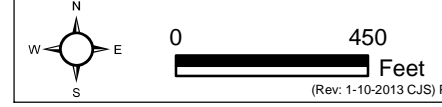
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-  Project Boundary
- Vegetation Types and Other Areas**
-  Annual Brome Grasslands
-  California Sagebrush-California Buckwheat Scrub
-  California Sagebrush-California Buckwheat Scrub/Disturbed
-  California Sagebrush-California Buckwheat Scrub/Toyon Chaparral
-  Coast Live Oak Woodland
-  Developed
-  Disturbed
-  Elderberry Scrub
-  Eucalyptus Grove
-  Giant Wild Rye Grassland
-  Holly-Leaved Cherry Stand
-  Open Water
-  Ornamental
-  Ruderal
-  Toyon Chaparral
-  Toyon Chaparral/Disturbed
-  Willow Thickets

Exhibit 4-10D
Vegetation Types and Other Areas

Park to Playa Trail



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**TABLE 4-6
VEGETATION TYPES AND OTHER AREAS**

Vegetation Type/Other Area	Area (acres)
Annual Brome Grasslands	43.5
California Sagebrush – California Buckwheat Scrub	72.1
California Sagebrush – California Buckwheat Scrub/Disturbed	35.2
California Sagebrush – California Buckwheat Scrub/Toyon Chaparral	0.6
Coast Live Oak Woodland	0.2
Elderberry Scrub	5.3
Eucalyptus Grove	0.3
Giant Wild Rye Grassland	0.5
Holly-Leaved Cherry Stand	0.5
Open Water	2.1
Toyon Chaparral	12.3
Toyon Chaparral/Disturbed	1.7
Willow Thickets	1.5
Ornamental	162.2
Ruderal Area	60.3
Developed Area	25.7
Disturbed Area	11.1
Total	435.1
Source: BonTerra Consulting 2012a.	

California Sagebrush – California Buckwheat Scrub

California sagebrush-California buckwheat scrub occurs in several scattered locations throughout the project area and is co-dominated by California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*). Additional common plant species present include sticky monkeyflower (*Mimulus aurantiacus*), prickly pear (*Opuntia* sp.), lemonade berry (*Rhus integrifolia*), purple sage (*Salvia leucophylla*), and black sage (*Salvia mellifera*).

California Sagebrush – California Buckwheat Scrub/Disturbed

Disturbed California sagebrush-California buckwheat scrub is located in patches in the Blair Hills Corridor (Segment C). The species composition generally resembles that of California sagebrush – California buckwheat scrub, though due to apparent disturbance, several non-native species have become established, including slender wild oats (*Avena barbata*), black mustard (*Brassica nigra*), ripgut brome (*Bromus diandrus*), hare barley (*Hordeum murinum* var. *leporinum*), and wild radish (*Raphanus sativus*).

Toyon Chaparral

Toyon chaparral is found in several scattered locations. This vegetation type is dominated by toyon (*Heteromeles arbutifolia*); other common species include lemonade berry and California buckwheat.

California Sagebrush – California Buckwheat Scrub/Toyon Chaparral

This vegetation type is located in the northern portion of the KHSRA and contains the dominant species associated with California sagebrush – California buckwheat scrub described above, along with substantial amounts of toyon.

Toyon Chaparral/Ornamental

This vegetation type occurs in small patches in the Stocker Street Corridor (Segment I) and consists of moderately dense toyon combined with ornamental vegetation such as eucalyptus trees (*Eucalyptus* spp.), freeway iceplant (*Carpobrotus edulis*), and cape honeysuckle (*Tecomaria capensis*).

Elderberry Scrub

Elderberry scrub is located in the northeastern portion of the KHSRA. This vegetation type is intermixed with California sagebrush – California buckwheat scrub; in addition to the common species found in that vegetation type, elderberry scrub contains dense groupings of blue elderberry (*Sambucus nigra* ssp. *caerulea*), generally on north-facing slopes.

Coast Live Oak Woodland

Coast live oak woodland occurs as a single stand of trees at the Western Ridgeline Trail (Segment G) in the KHSRA. This vegetation type is dominated by coast live oak trees and has an understory of non-native grassland species, including brome grasses and wild oats.

Giant Wild Rye Grassland

Giant wild rye grassland is found in the Stocker Street Corridor (Segment I). A single patch of dense giant wild rye (*Elymus condensatus*) is located southwest of the intersection of Stocker Street and Valley Ridge Avenue. This vegetation type consists of a monotypic stand of the single species giant wild rye.

Holly-Leaved Cherry Stand

Holly-leaved cherry stands are found in two patches in the Stocker Street Corridor (Segment I). These patches consist of moderately dense groupings of holly-leaved cherry trees (*Prunus ilicifolia*), with an understory of non-native grasses and herbaceous species. This vegetation type is not described as holly-leaved cherry woodland because these trees are found on an engineered and highly disturbed slope and are not found in alluvial soils that are typical of that vegetation type. Therefore, these patches are described as a holly-leaved cherry stand to differentiate this area from the naturally occurring woodland vegetation type.

Willow Thickets

Willow thickets occur in the extreme western portion of the KHSRA north of Gwen Moore Lake. This vegetation type is dominated by red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), narrowleaf willow (*Salix exigua*), and mule fat (*Baccharis salicifolia*).

Open Water

Open water occurs in Gwen Moore Lake in the northwestern portion of the KHSRA. The lake contains sparse emergent vegetation and lacks a tree canopy.

Annual Brome Grasslands

Annual brome grasslands occur primarily in the Stocker Street Corridor (Segment I) and north of the Baldwin Hills Scenic Overlook. The dominant species in these areas are non-native annual grass species, including soft chess, riggut brome, hare barley, and slender wild oats. Additional species include black mustard, tocalote (*Centaurea melitensis*), shortpod mustard (*Hirschfeldia incana*), tree tobacco (*Nicotiana glauca*), and wild radish.

Eucalyptus Grove

Eucalyptus groves are found in several small groupings in the Baldwin Hills Scenic Overlook. This vegetation type consists of dense groupings of various eucalyptus trees with little understory. They exhibit signs of opportunistic growth, as opposed to landscaped ornamental eucalyptus windrows found in the landscaped areas of the KHSRA that are designated as Ornamental areas.

Ornamental Areas

Ornamental vegetation is scattered throughout the area and includes landscaping (e.g., crape myrtle [*Lagerstroemia indica*], day lily [*Hemerocallis fulva*], and turf grass) in the center median of roads; landscaped park areas; and landscaped eucalyptus tree windrows (*Eucalyptus* sp.) adjacent to roads.

Ruderal Areas

Ruderal vegetation is scattered throughout and is sometimes intergraded with non-native grassland. This vegetation type is dominated by a mixture of herbs and grasses. Dominant species, which vary by patch, include shortpod mustard, rancher's fiddleneck, western sunflower (*Helianthus annuus*), cheeseweed, riggut brome, and wild oats. Other species present in lesser densities include Russian thistle (*Salsola tragus*), white nightshade (*Solanum americanum*), London rocket (*Sisymbrium irio*), and foxtail barley.

Developed Areas

Developed areas occur throughout the project area and consist of paved roads and utility structures that do not contain landscaped areas. No native vegetation is present in these areas.

Disturbed Areas

Disturbed areas are located throughout the project area and consist of unpaved bare ground and areas that contain little to no vegetation. These areas have been disturbed by activities such as grading and include dirt roads and existing trails.

Wildlife

Several wildlife species were observed or have potential to occur in the project 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. At the southwest corner of the KHSRA is Gwen Moore Lake and associated water features that occupy approximately three acres. The lake and associated features are all manmade and concrete-lined.

Fish presence in lake is limited to stocked fish species consisting of hatchery raised channel catfish (*Ictalurus punctatus*) and rainbow trout (*Oncorhynchus mykiss*). It is also expected that western mosquitofish (*Gambusia affinis*) will be present as it is a common practice for vector control districts to stock ponds in urban areas such as this to reduce the amount of mosquitoes. It is also possible that some members of the *Centrarchidae* family, such as sunfish and bass, could be present due to transplants. All potentially occurring fish are non-native species.

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 project area. No amphibian species were observed during surveys. Common species that could potentially occur in the project area include the baja California chorus frog (*Pseudacris hypochondriaca*), western toad (*Anaxyrus boreas*), and American bullfrog (*Lithobates catesbeiana*).

Reptiles

Reptile species observed during surveys include the western fence lizard (*Sceloporus occidentalis*), coachwhip (*Masticophis flagellum*), and red-eared slider (*Trachemys scripta elegans*). Although suitable reptile habitat exists, the park and associated habitat areas are isolated geographically due to surrounding urban development (i.e., residential uses and oil field). Thus, species diversity and abundance are not expected to be very high. Common species that could potentially occur in the project area include the side-blotched lizard (*Uta stansburiana*), southern alligator lizard (*Elgaria multicarinata*), gopher snake (*Pituophis catenifer*), California kingsnake (*Lampropeltis getula californiae*), and southern Pacific rattlesnake (*Crotalus oreganus helleri*).

The coastal sage scrub and chaparral vegetation types support various reptile species that use these areas during most seasons due to suitable soils for burrowing and suitable vegetation for cover. Typical species observed or expected in the sage scrub and chaparral areas include the western fence lizard, side-blotched lizard, coast horned lizard, coastal western whiptail, southern alligator lizard, and southern Pacific rattlesnake.

Reptile use of the annual grassland vegetation type is expected to vary during the year. In addition to normal seasonal fluctuations in activity levels, the presence of most reptile species in these areas is likely to be determined by the growth stages of the grasses; more species are present when the grasses are mature, but the diversity declines considerably after disturbance. Reptile species observed or expected to occur in the grassland vegetation type include the western fence lizard, side-blotched lizard, southern alligator lizard, coachwhip, gopher snake, California kingsnake, and southern Pacific rattlesnake.

Woodland habitats support a moderate level of diversity of lizards and snakes. The side-blotched lizard and western fence lizard are typically the most common reptiles in these vegetation types. Other reptiles expected in these vegetation types include the southern alligator lizard and gopher snake.

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 due to migration and/or breeding habits.

Sage scrub vegetation supports bird populations composed of species adapted to the dense vegetation that typifies these areas. Although large numbers of individuals can often be found inhabiting these vegetation types, species diversity is usually low to moderate, depending on the season. A relatively high proportion of the birds breeding in these habitats are year-round residents. Such species observed during surveys include the Bewick's wren (*Thryomanes bewickii*), wrentit (*Chamaea fasciata*), California thrasher (*Toxostoma redivivum*), spotted towhee (*Pipilo maculatus*), and California towhee (*Pipilo crissalis*).

Woodland and wash habitats provide food, cover, and breeding habitat for a wide variety of species throughout the year. Bird species observed or that are expected to breed in these habitats include the mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), Nuttall's woodpecker (*Picoides nuttallii*), bushtit (*Psaltriparus minimus*), phainopepla (*Phainopepla nitens*), song sparrow (*Melospiza melodia*), and Bullock's oriole (*Icterus bullockii*).

The annual grassland vegetation type supports fewer bird species than most other vegetation types. However, these areas provide important habitat for a number of species. Mourning dove, black phoebe, and lesser goldfinch are year-long residents in these areas. Migratory birds are also expected to use this vegetation type either during the summer or winter.

Additional species with potential to occur in one or more of the vegetation types in the project area include the California quail (*Callipepla californica*), Say's phoebe (*Sayornis saya*), and turkey vulture (*Cathartes aura*).

Mammals

As with other taxonomic groups, the presence of different vegetation types offers mammals a variety of habitats. This variety, in turn, has the potential to attract and support a diverse collection of mammals. However, due to fragmentation from other open spaces and the lack of suitable corridors to connect them, it is not expected that large populations will be present in the area, nor will the diversity be as great as other areas of this size and habitat type that have access to adjacent open space.

Small, ground-dwelling mammals observed or expected to occur along the proposed trail alignment include the California pocket mouse (*Perognathus californicus*), California mouse (*Peromyscus californicus*), woodrat (*Neotoma* sp.), pocket gopher (*Thomomys bottae*), Botta's pocket gopher (*Thomomys bottae*), California ground squirrel (*Spermophilus beecheyi*), brush rabbit (*Sylvilagus bachmani*), western gray squirrel (*Sciurus griseus*), and eastern fox squirrel (*Sciurus niger*).

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

Special Status Species

Special status species are 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 Plants

While a number of special status plant species are found in the Baldwin Hills area, suitable habitat in or near the proposed trail alignment is not present for most of these species. Suitable habitats for a few other species are present, but these species were not observed during focused surveys. However, 12 Southern California black walnut trees, which are designated in the California Rare Plant Rank (CRPR) as 4.2 (on the Watch List), were found in the parking lot of the Baldwin Hills Scenic Overlook and in two locations in the KHSRA. Exhibit 4-11 shows their general locations.

Some special status plant species have suitable habitat in or near the trail alignment but were not observed during site surveys. However, their absence along the trail alignment may not be conclusive due to rainfall below average levels during the 2011–2012 rainy season.

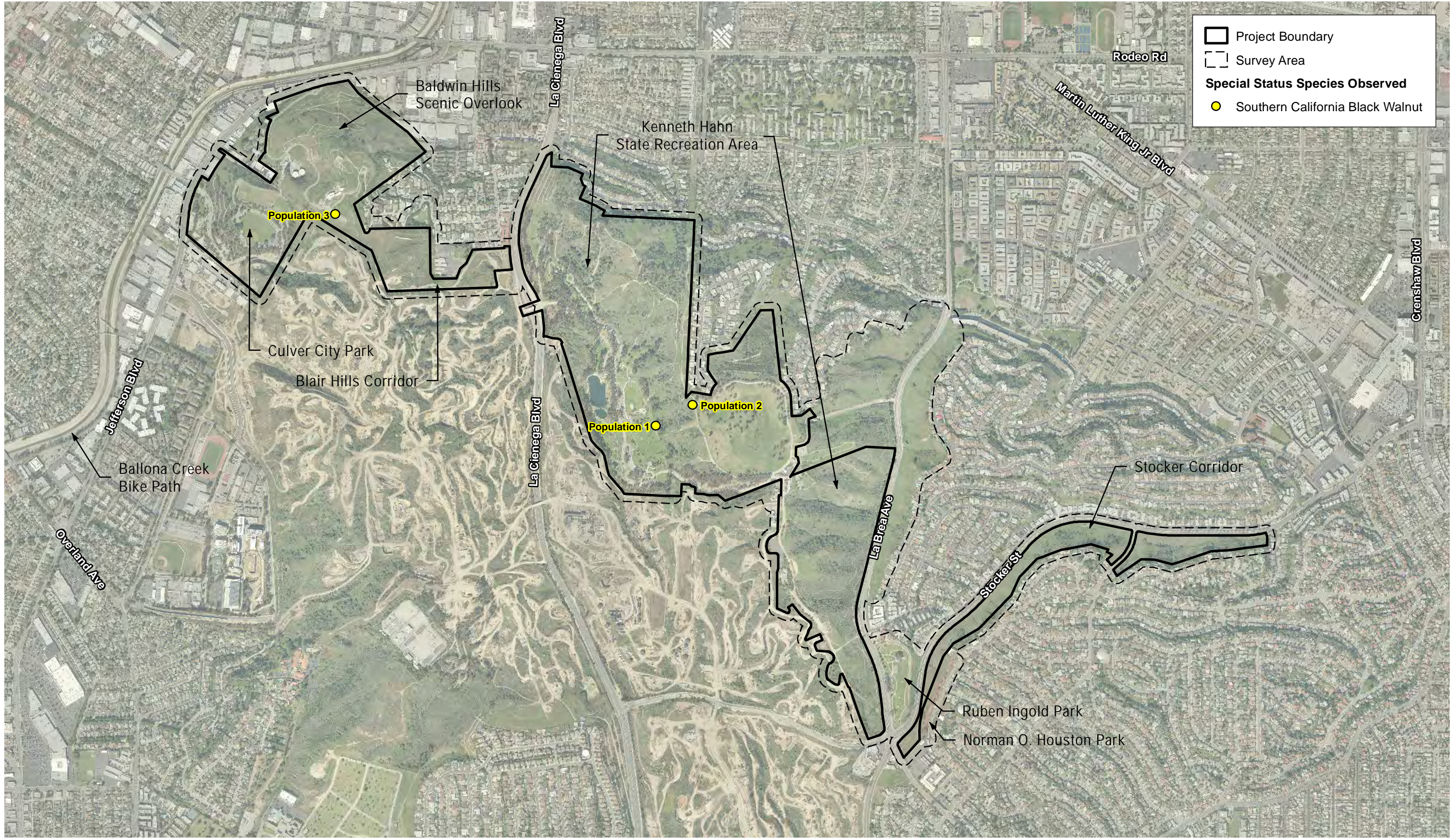
Special Status Wildlife

A number of special status wildlife species have been observed in the Baldwin Hills area and may potentially occur on or near the proposed trail alignment.

The coastal California gnatcatcher is a federally listed Threatened species and a California Species of Special Concern. In California, this species is an obligate resident of several distinct subassociations of the coastal sage scrub vegetation type. The project area supports sage scrub that would be considered potentially suitable habitat, and is generally in the gnatcatcher's current range. Protocol surveys for the coastal California gnatcatcher were conducted, and the findings indicate that the coastal sage scrub habitat in and near the proposed trail alignment are not occupied by the coastal California gnatcatcher. Therefore, the coastal California gnatcatcher is not expected to be present in or near the trail alignment.

Other special status wildlife species have potential to occur in the project area, but some species are not expected in or near the trail alignment due to lack of suitable habitat. Those that have moderate potential to occur include silvery legless lizard (*Aniella pulchra pulchra*), coast horned lizard (*Phrynosoma coronatum* ssp. *Blainvillii*), coast patch-nosed snake (*Salvador hexalepsis virgultea*), California least tern (*Sternula antillarum browni*), pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), and big free-trailed bat (*Nyctinomops macrotis*).

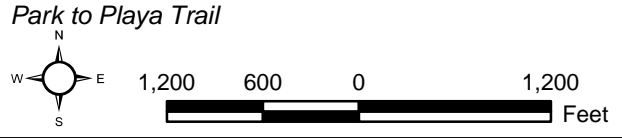
These wildlife species are listed as Species of Special Concern by the California Department of Fish and Wildlife (CDFW – formerly the California Department of Fish and Game), except or the California least tern, which is a federal and State Endangered species. Although the California least tern has moderate potential to occur as a fly-over, this species is not expected to forage or nest in the project area due to lack of potentially suitable habitat.



Project Boundary
 Survey Area
Special Status Species Observed
● Southern California Black Walnut

Special Status Biological Resources

Exhibit 4-11



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Wetlands and Riparian Areas

A number of lined and natural drainage channels are located in the various parks and open space areas where the Park to Playa Trail is proposed, although very limited patches of mule fat scrub, southern willow scrub, willow forest, and open water (which characterize wetlands and riparian areas) are found on the proposed trail alignment. During a survey in October 2012, six potential jurisdictional features were identified near the trail alignment, as shown in Exhibit 4-12.

Feature A is a soft-bottom and generally flat debris basin located in Segment C (Blair Hills Corridor). Vegetation in the basin consists of non-native grasses, such as ripgut brome (*Bromus diandrus*) and wild oat grass (*Avena* sp.), along with scattered native shrubs, such as coyote brush (*Baccharis pilularis*), wild rye (*Leymus condensatus*), and mule fat (*Baccharis salicifolia*). The lowest point of this area contains a small standpipe inlet tower and a concrete wall for scour protection along the northern edge. No drainage channel was observed in this area (or any evidence of water marks), and no connections to any jurisdictional streambeds were noted.

Feature B is a retention basin and storm drain channel that leads into an underground storm drain system just west of La Cienega Boulevard, at the eastern end of Segment C.

There are several trapezoidal channels in the KHSRA that are not connected to any natural streambeds but which convey storm water into an underground storm drain system that connects to the open channel west of La Cienega Boulevard. Drainages on the slopes and swales (with no evidence of an ordinary high water mark (OHWM) or definable streambed or bank) are also present in the KHSRA.

Feature C is a trapezoidal channel that is located adjacent to the western entrance to the KHSRA. Feature D is a 500-foot-long concrete-lined trapezoidal channel that enters an underground storm drain system. This channel appears to collect water that flows from adjacent landscaped areas. The width of the flat bottom portion of the channel measures four feet while the width from the top of bank measures ten feet. This feature was constructed in an upland area; is not connected to any natural streambeds; and does not convey “relatively permanent” flows, as defined by the U.S. Army Corps of Engineers (USACE).

Feature E is a swale that is located east of the northern parking lot at the KHSRA. It has no evidence of an OHWM, nor is there a definable streambed or bank. Therefore, this swale does not meet the wetlands hydrology threshold for the USACE and Regional Water Quality Control Board (RWQCB) or the stream threshold for CDFW.

Feature F is a swale that is located at the base of a hillside in the northwestern portion of the KHSRA. Similar to Feature E, there is no OHWM or streambed or bank present on this swale. Although there are ephemeral drainage features on the adjacent hillside, these drainage features exhibit no direct connection to the swale.

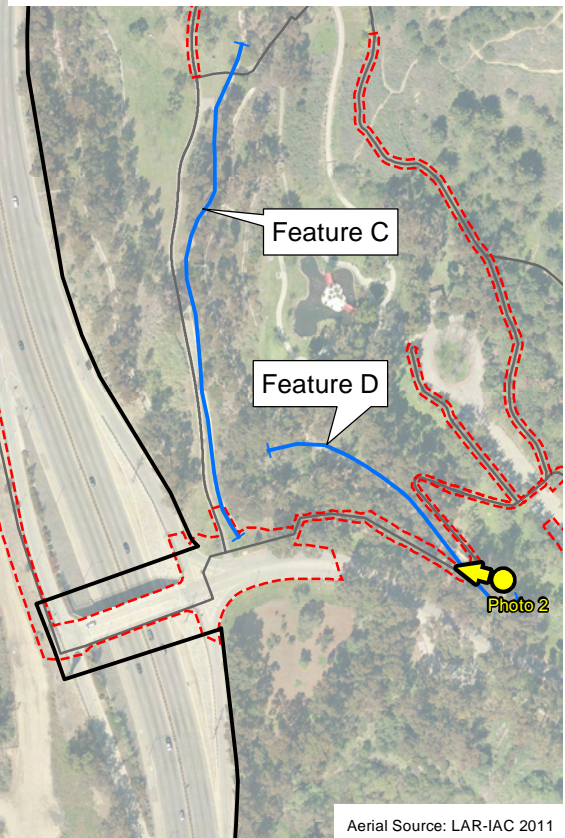
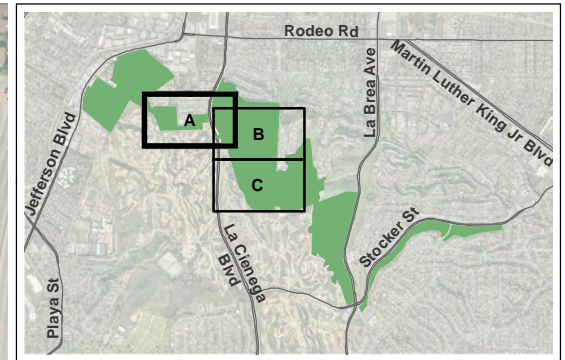
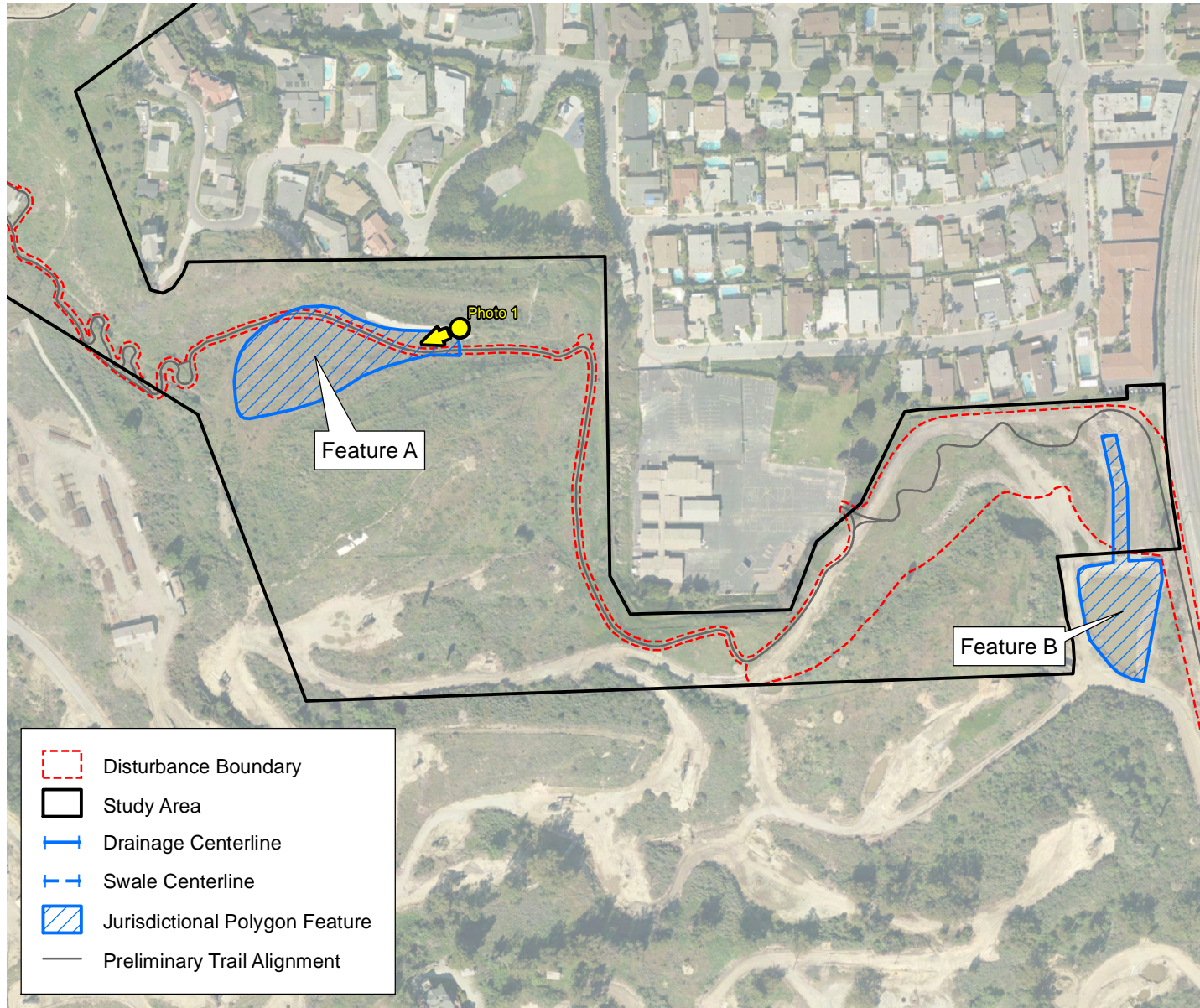
4.4.2 IMPACT ANALYSIS

a) Less Than Significant Impact with Mitigation

Impacts to Vegetation

Construction of the proposed trail improvements would lead to the disturbance, removal, and/or alteration of plant and animal habitats along the trail alignment and adjacent areas. Construction

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Aerial Source: LAR-IAC 2011

-  Disturbance Boundary
-  Study Area
-  Drainage Centerline
-  Swale Centerline
-  Jurisdictional Polygon Feature
-  Preliminary Trail Alignment

Jurisdictional Features

Park to Playa Trail

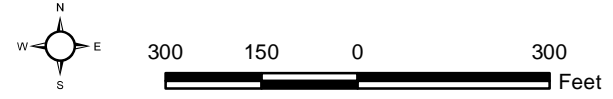
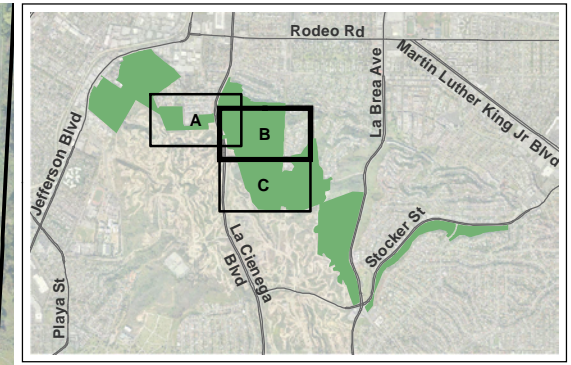
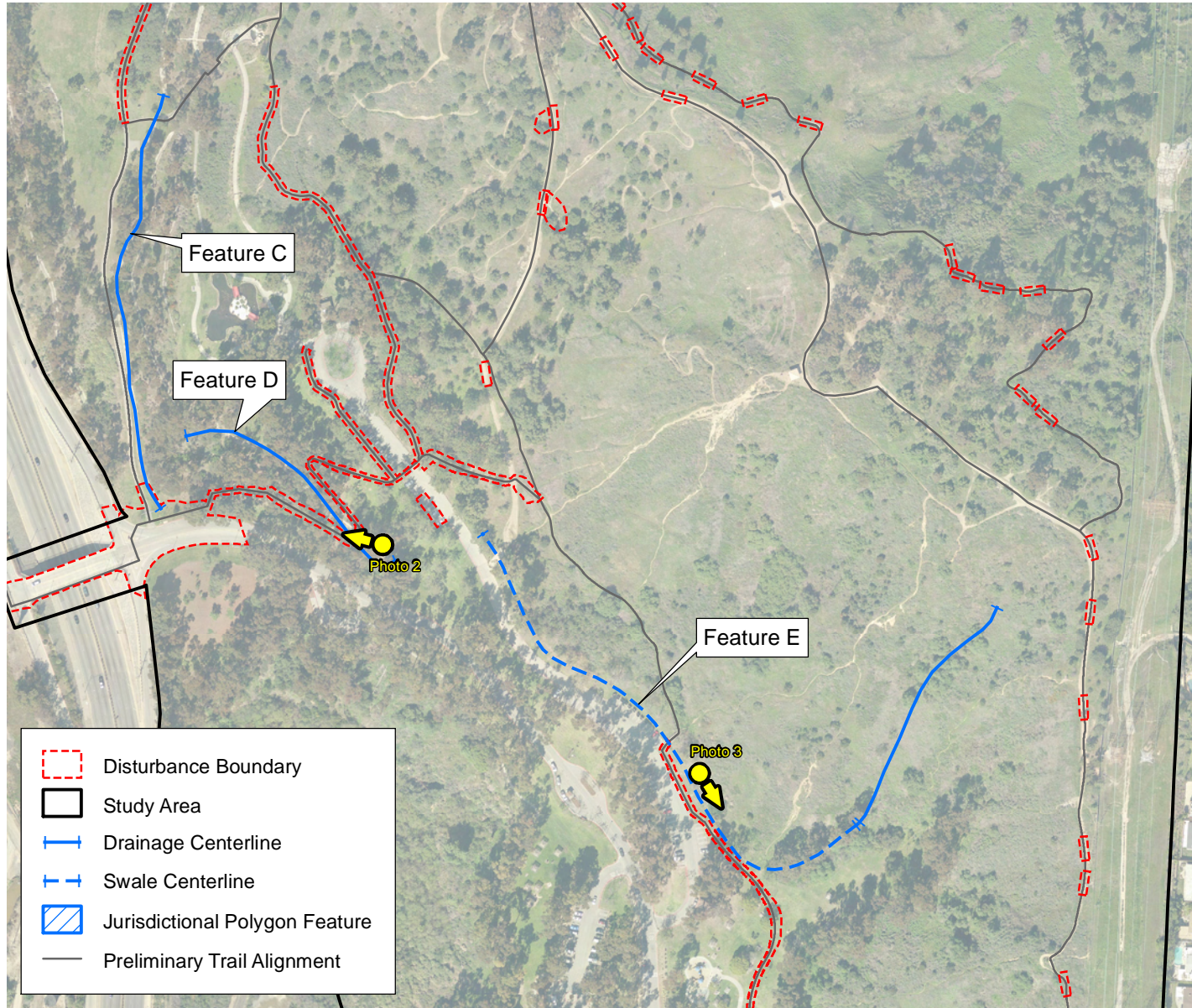


Exhibit 4-12A



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Aerial Source: LAR-IAC 2011

Jurisdictional Features

Park to Playa Trail

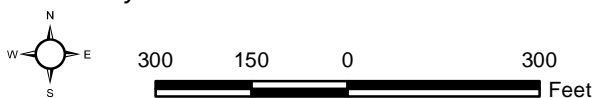
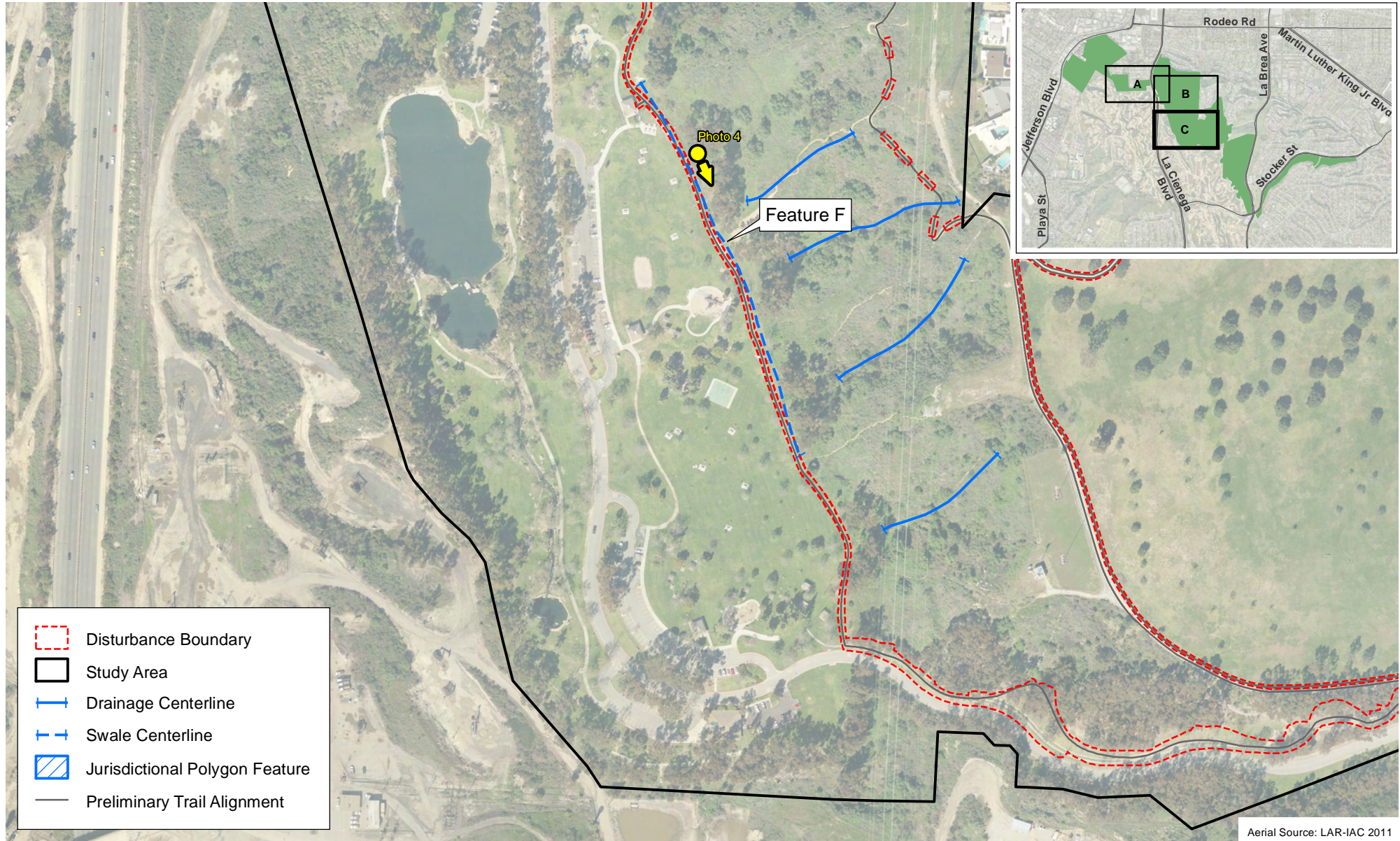








Exhibit 4-12B



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Aerial Source: LAR-IAC 2011

-  Disturbance Boundary
-  Study Area
-  Drainage Centerline
-  Swale Centerline
-  Jurisdictional Polygon Feature
-  Preliminary Trail Alignment

Jurisdictional Features

Park to Playa Trail

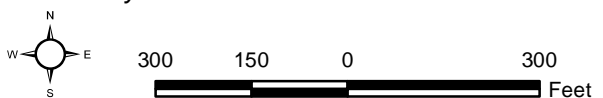


Exhibit 4-12C



would impact approximately 13.2 acres that support a variety of vegetation types. Table 4-7 provides an estimate of the acreage of each vegetation type that would be disturbed.

**TABLE 4-7
PROJECT IMPACT BY VEGETATION TYPE**

Vegetation Type/Other Area	Affected Area (acres)		
	Existing	Disturbed	Remaining
Annual Brome Grasslands	43.5	0.3	43.2
California Sagebrush – California Buckwheat Scrub	72.1	0.7	71.4
California Sagebrush – California Buckwheat Scrub /Disturbed	35.2	0.2	35.0
California Sagebrush – California Buckwheat Scrub /Toyon Chaparral	0.6	0.0	0.6
Coast Live Oak Woodland	0.2	<0.1	0.2
Developed	25.7	1.4	24.3
Disturbed	11.1	1.1	10.0
Elderberry Scrub	5.3	<0.1	5.3
Eucalyptus Grove	0.3	0.0	0.3
Giant Wild Rye Grassland	0.5	0.0	0.5
Holly-Leaved Cherry Stand	0.5	0.0	0.5
Open Water	2.1	0.0	2.1
Ornamental	162.2	3.8	158.4
Ruderal	60.3	5.7	54.6
Toyon Chaparral	12.3	0.0	12.3
Toyon Chaparral/Disturbed	1.7	0.0	1.7
Willow Thickets	1.5	0.0	1.5
Total	435.1	13.2	421.9
Source: BonTerra Consulting 2012a.			

Impacts to vegetation types that are common throughout the region or that are indicators of significant previous site disturbance would not be considered significant. However, impacts to the vegetation types discussed below would be considered significant.

California Sagebrush – California Buckwheat Scrub and California Sagebrush-California Buckwheat Scrub/Disturbed

These vegetation types would be impacted by construction of the Proposed Project. Impacts would be considered significant (1) because the County considers these vegetation types to be sensitive; (2) due to the low remaining acreage of this vegetation type in Southern California and in the project area; (3) because the CDFW lists this as a special status vegetation type; and (4) because of these vegetation types’ potential to support special status species. Preservation of these vegetation or restoration at an on-site or off-site location at a ratio no less than 1:1, as required by Mitigation Measure (MM) 4.4-1 would reduce impacts to less than significant levels.

Coast Live Oak Woodland

Coast live oak woodland could be impacted by construction of the Proposed Project. Impacts on this vegetation type would be considered significant due the limited distribution of this vegetation type in California and in the region. However, the proposed trail would follow the existing alignment of the Western Ridgeline Trail through this vegetation type and no tree removal would

occur. Compliance with oak tree ordinances (RRs 4.4-1 and 4.4-2) would reduce project impacts to less than significant levels.

Special Status Plant Species

As stated above, the Southern California black walnut is a special status plant that was found in the parking lot of the Baldwin Hills Scenic Overlook and in two locations in the KHSRA. To avoid impacts to this tree species, protective fencing shall be provided around walnut trees prior to construction in Segments B, D, F, and G (MM 4.4-2).

Although regional rainfall amounts were monitored to ensure the scientific adequacy of the focused surveys for special status plants, the below normal rainfall during the 2011–2012 rainy season may have yielded false negative survey results for some species that could possibly be present but may not be detectable at the time of the survey. Due to changes in climatic conditions from year to year, focused survey results are typically valid for no more than two years. Special status plant species identified as having potentially suitable habitat along the trail alignment may potentially occur in 2014 or later. A pre-construction survey, to be conducted within the year prior to the start of construction, should be conducted for special status plants with potential to occur to confirm their absence or presence in areas scheduled for disturbance and construction after March 1, 2014. If special status plant species are observed, the Biologist will determine the significance of the impact based on the status of the species and the number of individuals to be impacted, and will recommend appropriate mitigation (i.e., avoidance, protection, translocation, or replacement) (MM 4.4-3). Impacts would be less than significant after mitigation.

Impacts to Wildlife

The Proposed Project would result in the loss of wildlife habitats, which provide nesting, foraging, roosting, and denning opportunities for a wide variety of wildlife species. The removal or alteration of habitats would result in the loss of small mammals, reptiles, amphibians, and other animals of slow mobility that live in the impacted area. More mobile wildlife species would be forced to move into remaining areas of open space, consequently increasing competition for available resources in those areas. The Proposed Project would impact a small area of potential habitats, but would also restore other areas to provide high-quality habitat. Thus, project implementation would not significantly reduce wildlife populations in the region, nor would it reduce any specific wildlife population to below self-sustaining numbers. Therefore, impacts on wildlife would be considered adverse but not significant and no mitigation is required.

Impacts to wildlife species that are listed as Species of Special Concern by the CDFW (i.e., pallid bat, western mastiff bat, pocketed free-tailed bat, and big free-tailed bat) would not be considered significant since only marginal habitats are present near the trail alignment and habitat loss due to the Project would not substantially reduce the regional populations of any of these species.

Seven federally and/or State-listed Threatened or Endangered bird species occur in the larger project area: western snowy plover, southwestern willow flycatcher, California black rail, Belding's savannah sparrow, coastal California gnatcatcher, bank swallow, and California least tern. The western snowy plover, southwestern willow flycatcher, California black rail, Belding's savannah sparrow, and bank swallow are not expected to occur along the trail alignment due to the lack of potentially suitable habitat. California least tern has moderate potential to occur as a fly-over, but the Project would not result in the loss of any open water feature, and construction activities would be short-term. Therefore, impacts on this species would be negligible. The

coastal California gnatcatcher was not observed during 2012 focused surveys. Therefore, there would be no impact on this species and no mitigation is required.

One California Species of Special Concern, the burrowing owl, is not expected to occur in the area due to lack of potentially suitable habitat.

Raptor species (e.g., red-tailed hawk) have potential to nest in the project 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). The loss of any active raptor nest would be considered significant and MM 4.4-4 would reduce impacts to raptor nests to less than significant levels.

Additionally, the loss of active nests for any native bird species may be considered a violation of the Migratory Bird Treaty Act (MBTA), which protects the nests of all native bird species, including common species. In addition to protecting nests located in native trees and shrubs, the MBTA also protects nests located on bare ground and on structures. If construction were to start 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. In compliance with the MBTA, vegetation clearing for construction should occur prior to March 15. Otherwise, a pre-construction survey for nesting birds and the protection of active nests shall be made during construction activities (MM 4.4-5). Compliance with this MM would avoid impacts on migratory birds and impacts would be less than significant after mitigation.

Changes in water quality and water velocity may also affect biological resources in the area. Storm water runoff from construction activities may contain residues and chemical products from construction equipment (albeit temporary). Also, increased trail use may have the potential to adversely affect water quality and, in turn, affect populations of wildlife species (including special status species) by (1) reducing the amount of available habitat; (2) smothering eggs of aquatic species (fish and amphibians); and (3) impacting other wildlife species that use riparian areas (amphibians, reptiles, birds, and mammals). RR 4.9-1 (from Section 4.9) requires preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs) to reduce pollutants in the storm water and to prevent adverse impacts on water quality. With compliance with this RR, indirect impacts to special status species would be less than significant.

b) Less than Significant Impact with Mitigation

The proposed trail improvements would not disturb natural drainage channels, and no riparian or aquatic habitat will be affected by the improvements. However, the western section of Segment C (Blair Hills Corridor Trail) would pass through a flood-control facility (Feature A) that is located in the Blair Hills. No jurisdictional waters were observed to enter this facility, and no identifiable streambed or bank was observed. The proposed 6-foot-wide natural surface trail would be constructed "at-grade" through this area, affecting approximately 0.04 acre (295 linear feet). Trail construction is expected to consist mainly of compacting the existing soil. Vegetation in this area is mapped as disturbed coastal sage scrub; therefore no riparian habitat will be affected.

The proposed trail at the eastern section of Segment C would be located to the north of the point where the drainage channel (Feature B) goes underground. Since the proposed trail would be located away from the off-site retention basin, the drainage channel, and the storm drain inlet, no impacts to Feature B would occur. No regulatory authorization would be required.

It is unlikely that regulatory agency staff would exert jurisdiction over Feature C since trail improvements would occur outside of and adjacent to the point where water flows into an underground storm drain. Furthermore, no aquatic habitat is located in this channel. No impacts to this feature are expected to occur. Therefore, no regulatory authorization would be required.

Segment D (Valley Trail) proposes the construction of a free-span footbridge over a concrete-lined trapezoidal channel near the KHSRA entrance. The proposed footbridge over Feature D is not considered an impact because this channel is unvegetated and no discharge of fill materials in the channel is proposed. Any shading that would result from the footbridge would not be considered an impact to riparian resources. No regulatory authorization would be required.

Regardless of Feature E's potential to be a jurisdictional resource, the proposed trail alignment would pass adjacent to and outside of this swale. Therefore, no impacts are expected to occur and no regulatory authorization would be required.

The proposed alignment of Segment D (Valley Trail) along the lower picnic area would run adjacent to and outside of the swale identified as Feature F, but would not affect this drainage feature. Therefore, no impacts are expected to occur and no regulatory authorization would be required.

The Proposed Project would convert a concrete-lined drainage channel in Segment E (Hilltop Connector Trail) to natural conditions, which would increase percolation of dry and wet weather runoff into the ground and remove pollutants from the runoff. This project feature will have beneficial impacts on riparian resources.

Table 4-8 summarizes potential impacts to jurisdictional resources.

**TABLE 4-8
POTENTIAL IMPACTS TO JURISDICTIONAL FEATURES**

Feature	Location	Jurisdictional*	Impacts
A	Western section of Blair Hills	Yes	Temporary impact for trail construction – 295 linear feet x 6 feet wide (0.04 acre)
B	Eastern section of Blair Hills	Yes	None expected to occur
C	Western section of KHSRA	No	None expected to occur
D	Western section of KHSRA	No	Free span bridge – none expected to occur
E	KHSRA	No	None expected to occur
F	KHSRA	No	None expected to occur

KHSRA: Kenneth Hahn State Recreation Area

* The jurisdictional determination listed above is based on the professional judgment of BonTerra Consulting. Regulatory agencies are responsible for a final determination on the whether these features are under their respective jurisdictions.

Source: BonTerra Consulting 2012a.

While impacts to Feature A would be minimal and temporary and although no impacts are expected on Features B through F, consultation with regulatory agencies is necessary to determine whether any of these resources are considered to be under their jurisdiction and

whether project activities would constitute an impact that would require regulatory permits. Impacts on riparian areas would be less than significant with implementation of MM 4.4-6.

c) No Impact

No wetland resources as defined by Section 404 of the Clean Water Act would be affected by the Proposed Project since the trail alignment would not pass near wetland areas. Also, the flood-control facility in Segment C (Blair Hills Corridor) contains insufficient hydrophytic vegetation and the concrete channel in Segment D (Valley Trail) contains no hydrophytic vegetation or hydric soils. No impact on wetlands would occur.

d) Less than Significant Impact

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 ecosystems are not expected to venture across the wide expanse of urban development that separates their locations. 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.

The north-south trending hilltops and canyon gullies in the project area may be used as a wildlife corridor by small mammals and herpetofauna. Drainages on and near the hills, including the Ballona Creek, are largely cement bottom and generally lack native riparian vegetation. Therefore, they are not expected to be highly utilized as local corridors in or outside the Baldwin Hills. Wildlife species expected to use the open spaces in the area for local movement include, but are not limited to, small- to medium-sized animals such as raccoons, rabbits, snakes, and lizards.

The proposed trail alignment would go through public parks and open spaces, but the trail would generally be at-grade except for a few areas where footbridges are proposed over drainage channels. Therefore, the trail would preclude the disruption of local wildlife movement and regional migration.

Proposed facilities (i.e., signs, interpretive node, shade structure, and benches) would present isolated barriers to wildlife movement, but would not be large enough to completely restrict any movement. Rather, wildlife would be able to readily move around these trail improvements; therefore, the Project would not reduce wildlife movement opportunities in the area. Habitat restoration and revegetation of areas along the trail would also have beneficial impacts on wildlife movement through the area. The Project would not cause a substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor would it impede the use of native wildlife nursery sites. Impacts would be less than significant.

e) Less than Significant Impact

There are several trees in the parks and open space areas where the Park to Playa Trail is proposed. Trail improvements would remove existing vegetation in various areas, including palm trees at the eastern end of Segment C (Blair Hills Corridor Trail) and eucalyptus trees

along Segment E (Hilltop Connector Trail). While the proposed trail alignment would be located near other trees, none are specifically proposed for removal.

Oak trees are recognized by the County of Los Angeles in its Oak Tree Ordinance (#88-0157) as “significant historical, aesthetic, and valuable ecological resources and as one of the most picturesque trees in Los Angeles County, lending beauty and charm to the natural and man-made landscape, enhancing the value of property, and the character of the communities in which they exist”. The oak trees near the trail alignment and within the coast live oak woodland vegetation type are subject to Section 22.56.2060 of the Los Angeles County Oak Tree Ordinance.

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. Impacts to oak trees regulated by this ordinance require an application to the County and a detailed Oak Tree Report. Mitigation for impacts to oak trees is usually required as a condition of an Oak Tree Permit. The Project would need to comply with this ordinance through the implementation of RR 4.4-1.

The City of Los Angeles Tree Ordinance (LA City Municipal Code Chapter IV, Article 6 – Preservation of Protected Trees) identifies oak, Southern California black walnut, western sycamore, and California bay trees as protected trees that cannot be relocated or removed without a permit. The Project would need to comply with this ordinance through implementation of RR 4.4-2. Implementation of MM 4.4-2 would also protect walnut trees found near the trail alignment.

The City of Culver City’s Street Tree Master Plan assigns tree species on specific streets in the City, although no street tree is assigned to the segment of Jefferson Boulevard and Duquesne Avenue that front Culver City Park (Segment A) and the Baldwin Hills Scenic Overlook (Segment B). Street trees on Hetzler Road are included on the approved landscape plan for the overlook (Culver City 2002). No trees are proposed for removal in Segments A, B, and C (Culver City Park, Baldwin Hills Scenic Overlook, or Blair Hills Corridor, respectively). Therefore, no conflict with the Street Tree Master Plan or approved landscape plan would occur with the Project.

No conflict with a tree preservation ordinance would occur with compliance with RRs 4.4-1 and 4.4-2 and implementation of MM 4.4-2. Impacts would be less than significant.

f) No Impact

The Baldwin Hills area is not located in a Significant Ecological Area (SEA), as designated by the County (County of Los Angeles 2011b). The Ballona Wetlands SEA is the nearest SEA, located 3.3 miles southwest of Culver City Park. The Project 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 natural community conservation plans (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 MITIGATION PROGRAM

Regulatory Requirements

RR 4.4-1 Prior to construction activities in the KHSRA and Stocker Corridor (Segments D, E, G, H, and I) that may require the removal of oak trees or that will be located within the dripline of oak trees, the contractor shall obtain an Oak Tree Permit from the County prior to any vegetation clearing; tree removal; or grading. The permit application to the County shall include a detailed Oak Tree Report and mitigation for impacts to oak trees. All work shall comply with the conditions of the Oak Tree Permit, including tree replacement at a ratio no less than 2:1; acreage replacement equal to the acreage impacted; and/or installation of protective fencing outside the dripline of nearby oak trees throughout construction.

The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation prior to any site clearing.

RR 4.4-2 For construction activities in the City of Los Angeles (Segments F and G), the contractor shall not remove or relocate any oak, Southern California black walnut, western sycamore, and/or California bay trees without a permit from the City Board of Public Works, and shall include the replacement of affected trees at a 2:1 ratio or relocation on the same property if there is a reasonable probability that the tree will survive.

The BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation prior to any site clearing.

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.

The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation prior to and during construction activities for the Proposed Project.

Mitigation Measures

MM 4.4-1 California Sagebrush – California Buckwheat Scrub shall be preserved or restored 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 dedicated as permanent open space and preserved in perpetuity by the BHRCA. A California Sagebrush – California Buckwheat Scrub Restoration Program shall be prepared and implemented 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 California Sagebrush – California Buckwheat Scrub near the construction area. Construction limits shall be flagged in the field, and no earth-moving equipment shall be allowed in these areas. The BHRCA shall include this MM as a note in the Contractor Specifications, and the Contractor shall comply with this MM prior to and during construction activities.

If off-site restoration is used to satisfy the mitigation, the BHRCA shall hire a qualified Biologist to identify a suitable restoration location and to prepare and implement a California Sagebrush – California Buckwheat 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 BHRCA shall hire a qualified Biologist to implement this MM, and the Contractor shall comply with the recommendations of the Biologist prior to and during construction activities.

MM 4.4-2 Prior to vegetation clearing and the start of construction in Segments B, D, F, and G, the contractor shall provide protective fencing around the Southern California black walnut trees in the parking lot of the Baldwin Hills Scenic Overlook and in the KHSRA. 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 BHRCA shall include this MM as a note in the Contractor Specifications, and the Contractor shall comply with this MM prior to and during construction activities.

MM 4.4-3 Prior to the continuance of construction beyond March 1, 2014, a pre-construction focused survey for special status plants shall be conducted in potentially suitable habitat to confirm the presence or absence of special status plants that have potential to occur. If no special status plants are observed, construction may proceed. If special status plants are observed, a Biologist shall determine the significance of the impact based on status of the species and the number of individuals that would be impacted and shall provide appropriate mitigation. This mitigation shall include avoidance of the species through trail realignment; protection of the species through the establishment of buffer areas where no ground disturbance or construction would be allowed; translocation of the special status plants into adjacent areas with similar habitat prior to the start of vegetation clearing; and/or a minimum 2:1 replacement on-site or at a suitable off-site location.

The BHRCA shall hire a Biologist to conduct the focused surveys, and the recommendations of the Biologist shall be included by the BHRCA as a note in the Contractor Specifications. The Contractor shall comply with the recommendations prior to and during construction activities. The Biologist shall be responsible for translocation and/or replacement efforts.

MM 4.4-4 Seven days prior to the start of construction activities, a qualified Biologist shall survey within 500 feet of the project impact area for the presence of any active raptor nests (common or special status). Any nest found during survey efforts shall be mapped on the construction plans. If no active nests are found, no further mitigation is required. Results of the surveys shall be provided to the California Department of Fish and Wildlife (CDFW).

If nesting activity is present at any raptor nest site, the active nest shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the *California Fish and Game Code*. (Nesting activity for raptors in the region normally occurs from February 1 to June 30.) To protect any nest site, the following restrictions on construction activities are required between February 1 and June 30 (or until nests are no longer active, as determined by the Biologist): (1) clearing limits shall be established within a 500-foot buffer around any occupied nest, or as otherwise determined by the Biologist and (2) access and surveying shall be restricted within 300 feet of any occupied nest, or as otherwise determined by the Biologist. Any encroachment into the buffer area around the known nest shall only be allowed if the Biologist determines that the proposed activity will not disturb the nest occupants. Construction during the non-nesting season can occur only at the sites if the Biologist has determined that fledglings have left the nest.

If an active nest is observed during the non-nesting season, the nest site shall be monitored by a qualified Biologist and, when the raptor is away from the nest, the Biologist will flush any raptor to open space areas. The Biologist will then remove the nest site so raptors cannot return to it.

The BHRCA 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 4.4-5 Construction shall be conducted during the non-nesting season (generally from August 16 to the end of February) to avoid any potential disturbance of avian breeding activities. If work is to be conducted during the general nesting season (March 1–August 15), then a pre-construction nesting bird survey shall be conducted by a qualified Biologist within three days prior to disturbance. 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 will 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 will be designed to prevent disruption of nesting activity. Only limited construction activities (if any) will be approved by the Biologist to take place within the buffer zone. The buffer zone restrictions will be suspended once the Biologist determines that nesting activity has ceased.

The BHRCA 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 4.4-6 Prior to the approval of the project plans and specifications, the BHRCA shall confirm that regulatory permit authorizations from the U.S. Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (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 be characterized as dredge or fill within "Waters of the U.S.", including wetlands, and/or "Waters of the State". Habitat preservation or replacement/restoration that will result in no net loss of riparian habitat shall be used to offset impacts, as outlined in the agency-approved Habitat Mitigation Monitoring Plan (HMMP).

If necessary, the BHRCA shall obtain resource agency permits and hire a Biologist to develop and implement the HMMP. The Contractor shall comply with permit conditions related to on-site habitat preservation prior to and during construction activities.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Phase I Cultural Resources Assessment was completed by BonTerra Consulting in November 2012. The findings of this report are summarized below, with the entire report provided in Appendix C (BonTerra Consulting 2012b).

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 BCE⁴ 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 CE⁵)
- 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.

⁴ BCE is defined as “Before Common Era” and generally refers to that time period commonly referred to as “Before Christ” (B.C.).

⁵ CE is defined as “Common Era” and generally refers to that time period commonly referred to as “annō Domini” (A.D.).

The Gabrielino communities of *Saa'anga* and *Waachga* 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 proposed trail alignment.

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 on the property in 1924, and oil drilling operations occurred throughout the Baldwin Hills. 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 and 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 1932 Olympic Games were planted.

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 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 0.2 mile north of the KHSRA.

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. The Baldwin Hills Master Plan states that the historic home of the Chandler family is located on the western ridgeline of the KHSRA, 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 0.5 mile north of the trail alignment, west of La Cienega Boulevard. Various other City Historical Cultural Landmarks are located farther from the Park to Playa Trail.

4.5.2 IMPACT ANALYSIS

a) No Impact

While there are historic structures in the project area and some structures are present in the public parks where the proposed trail alignment would pass, no building demolition activities are proposed as part of the Project. Most of the proposed improvements would occur on existing

trails and would not be located near historic structures. There are no historical structures on or near the alignment of new trails that would be affected by the Proposed Project. Therefore, no impact on historical resources would occur with implementation of the Proposed Project.

b) Less than Significant Impact With Mitigation

Fourteen previous archaeological surveys included portions of the 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, immediately adjacent to La Cienega Boulevard and north of the lake in the KHSRA. The site area is approximately 400 feet west of the trail alignment.
- **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. The site location is along the proposed trail segment, approximately 800 feet west-northwest of the closed school.
- **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 was not relocated during the current study and is presumed destroyed.

An archaeological survey was also conducted to determine whether any cultural resources remain exposed on the surface of the trail alignment 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 proposed 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.

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 trail alignment and a local Native American group has recommended monitoring, MM 4.5-1 has been 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. Implementation of MM 4.5-1 would reduce potentially significant adverse impacts to less than significant levels.

c) Less than Significant Impact With Mitigation

A paleontological records search for the Project was conducted by Samuel McLeod, Vertebrate Paleontologist at the Natural History Museum of Los Angeles County (NHMLAC), on August 24, 2012. McLeod's research reveals that no fossil vertebrate localities are recorded along the trail alignment, but localities do exist from similar sedimentary deposits near the alignment.

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.

The Project will not involve deeper excavations; however, it is possible that fossil material could be encountered during more shallow excavations. MM 4.5-2 has been developed to ensure that significant paleontological resources are not inadvertently disturbed or destroyed during ground disturbance. Impacts would be less than significant after mitigation.

d) Less than Significant Impact

Previous ground disturbance activities have occurred in the KHSRA, Culver City Park, Baldwin Hills Scenic Overlook, Stocker Street Corridor, Blair Hills Corridor, and adjacent roadways where the proposed Park to Playa Trail would be located. Thus, these areas are not expected to contain human remains, and the proposed trail improvements 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 1.0 mile southwest of the KHSRA. No impact to this cemetery or other cemeteries in the area would occur with the Project. No impacts on any known human remains are expected to occur.

However, should grading and excavation for construction of the proposed trail improvements 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 MITIGATION PROGRAM

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 BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation upon the discovery of human remains during ground-disturbing activities.

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 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 BHRCA shall retain 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 BHRCA shall include this MM as a note in the Contractor Specifications, and the Contractor shall comply with this regulation upon the discovery of fossil resources during ground-disturbing activities. The BHRCA shall hire the Paleontologist to perform the resource evaluation and disposition, as necessary.

4.6	<u>GEOLOGY AND SOILS</u>	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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 $\frac{2}{3}$ 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).

Seismic Characteristics

The 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 (which makes up 28 kilometers of the total 209-kilometer-long fault) (USGS 2012). The section of the fault segment passing through the KHSRA and Stocker Corridor have experienced historic (past 200 years) displacement, while the segment to the northwest of the Baldwin Hills 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 4-13, an Alquist-Priolo Special Studies Zone has been designated along the Newport-Inglewood Fault, which runs northwest to southeast through the hills. An outlying fault creep has been identified on a steep slope that runs along the western edge of the abandoned school site in the Blair Hills area (Segment C). The fault passes through the KHSRA (where Segments D, E, F, G, and H are located) and the western section of the Stocker Corridor Trail (Segment I) (CGS 1986a, 1986b, 1986c).

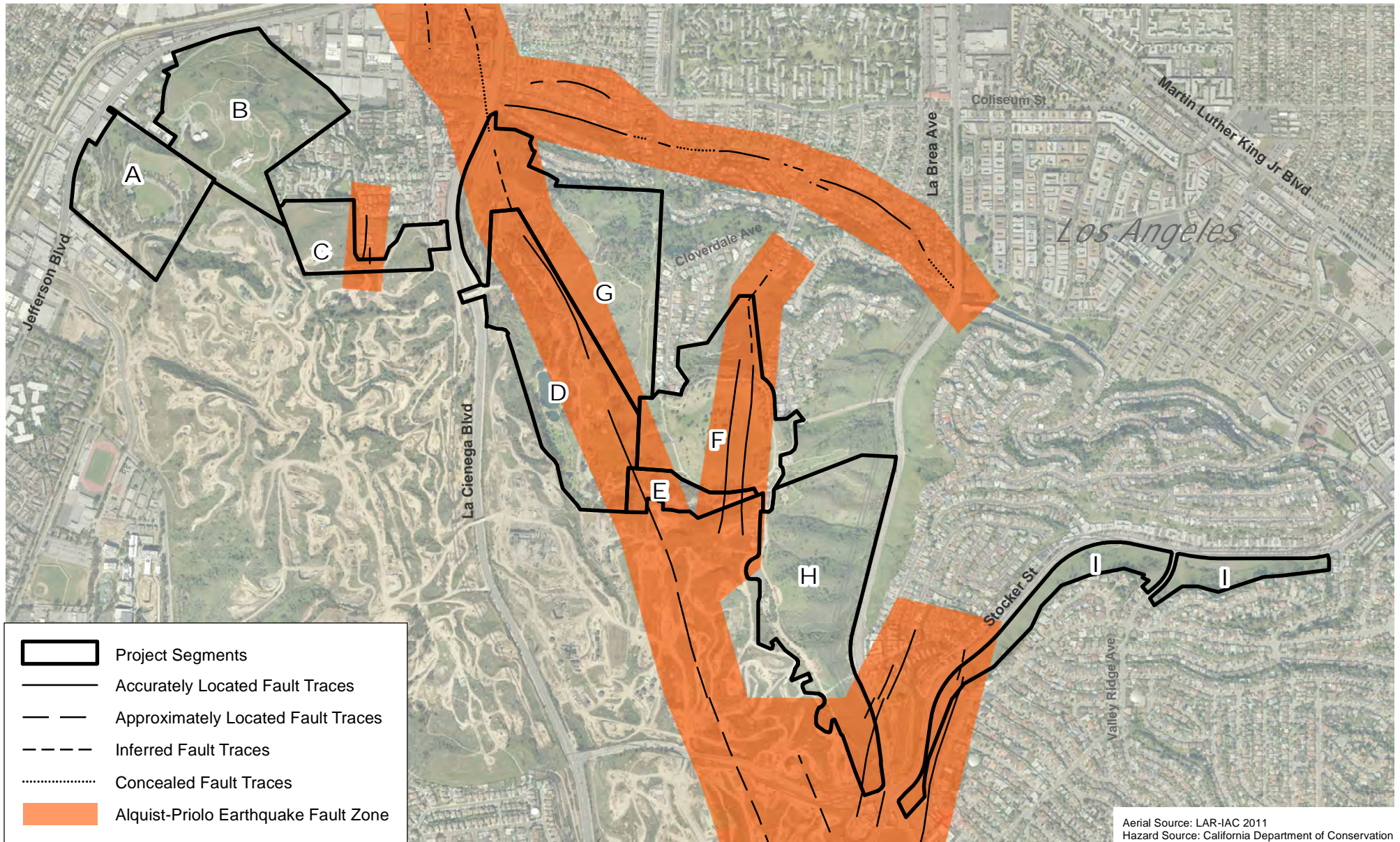
Peak ground acceleration on the proposed trail alignment due to an earthquake event on the Newport-Inglewood Fault is estimated by the California Geological Survey (CGS) to be as much as 0.441 g (where g = acceleration of gravity) on firm rock (CGS 2012).

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 Baldwin Hills (CGS 1999a, 1999b, 1999c). No liquefaction is expected along the trail alignment, except for the segment of Duquesne Avenue from the Ballona Creek to Culver City Park.

Landslides

Landslides have occurred at the Baldwin Hills during heavy rains in 1969, 1978, and 1980. Unstable slopes have been observed along the Stocker Corridor Trail (Segment I) and erosion occurs along the Western Ridgeline Trail (Segment G). The northern portion of Culver City Park (Segment A) has also experienced slope movement. Exhibit 4-14 shows areas where the CGS has identified earthquake-induced landslides (CGS 1999a, 1999b, 1999c).

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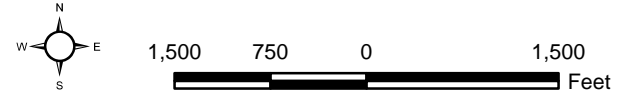
	Project Segments
	Accurately Located Fault Traces
	Approximately Located Fault Traces
	Inferred Fault Traces
	Concealed Fault Traces
	Alquist-Priolo Earthquake Fault Zone

Aerial Source: LAR-IAC 2011
Hazard Source: California Department of Conservation

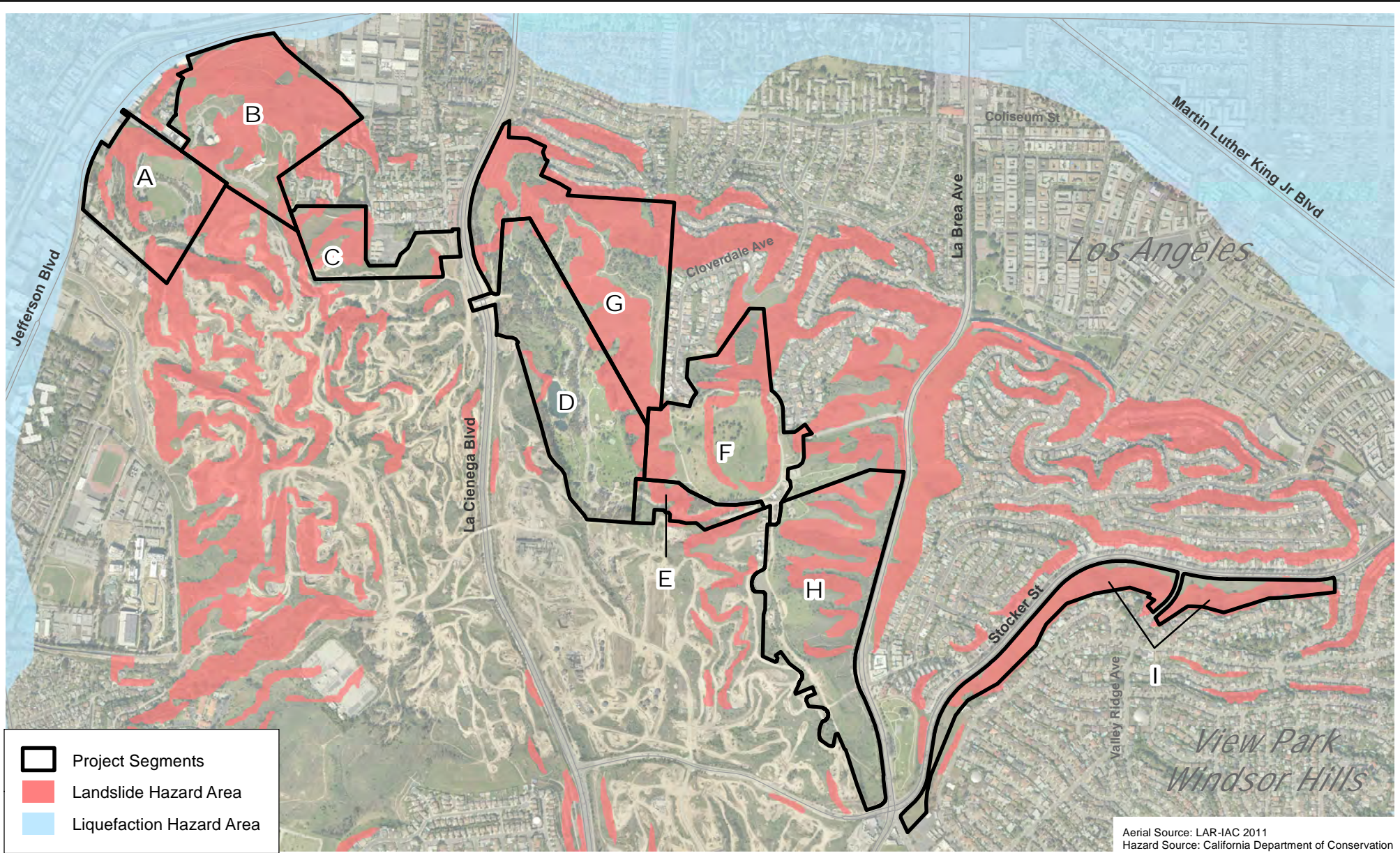
Alquist-Priolo Special Studies Zone




Exhibit 4-13

Park to Playa Trail



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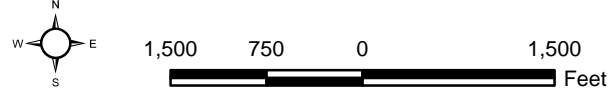
-  Project Segments
-  Landslide Hazard Area
-  Liquefaction Hazard Area

Aerial Source: LAR-IAC 2011
 Hazard Source: California Department of Conservation

Landslide Hazards

Exhibit 4-14

Park to Playa Trail



Ground Elevations

The proposed trail alignment has highly variable elevations ranging from 70 feet above msl at Duquesne Avenue and the Ballona Creek Bike Path; rising to 380 feet above msl at Culver City Park (Segment A); at over 420 feet above msl at the Baldwin Hills Scenic Overlook (Segment B); between 200 to 300 feet above msl at the Blair Hills Corridor (Segment C); 200 to 380 feet above msl along the Valley Trail (Segment D) and Hilltop Connector Trail (Segment E); nearly 500 feet above msl at the highest point along the Western Ridgeline Trail (Segment G); 511 feet above msl at the highest point along the Eastern Ridgeline Trail (Segment H); and from 200 to 430 feet above msl along the Stocker Corridor Trail (Segment I), which passes through the northwest-facing slopes of Windsor Hills. The Eastern Ridgeline Trail runs along the top of a hill, with east-facing slopes toward La Brea Avenue. The Western Ridgeline Trail runs along the top of another hill, with southwest-facing slopes toward La Cienega Boulevard.

Most streets in the area have been constructed at the bottom of natural canyons. Therefore, the side slopes of the canyons define the areas along the sides 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 Chino association. Chino soils, which make up 85 percent of this association, consist of gray and dark gray loam, silt loam, or clay loam that are 16 inches thick, with gray and light brownish-gray silty clay loam and clay loam underneath. These soils are poorly drained and have moderately slow subsoil permeability. They have moderate soil expansion potential, high corrosivity, severe septic tank limitations, and moderate limitations to allowable soil pressure (USDA 1969).

4.6.2 IMPACT ANALYSIS

a)(i) Less Than Significant Impact

The Newport-Inglewood Fault runs through the Baldwin Hills, crossing several trail segments. 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.

Fault rupture may occur along the proposed trail alignment, and the proposed trail improvements would be subject to surface rupture hazards from the Newport-Inglewood Fault. However, no habitable structures are proposed with the Project. The type and limited size of trail improvements (i.e., new trails, trail repaving, signs, drain dips, revegetation, drainage channel restoration, benches, and a gravel parking lot) 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 would be less than significant.

a)(ii) Less Than Significant Impact

Earthquake events along the Newport-Inglewood Fault would cause major ground shaking along the proposed trail alignment. In addition, earthquakes in the Southern California region would also cause moderate to strong ground shaking in the project area. The peak ground

acceleration along the trail is estimated at 0.441g due to earthquake events along the Hollywood Fault Zone, the Palos Verdes Fault Zone, and/or the Newport-Inglewood Fault Zone.

Strong ground shaking would not affect the existing and proposed trails, drain dips, revegetation areas, crosswalks, or other at-grade improvements, but could affect the stability of proposed structures (e.g., retaining walls, stairs, fences, shade structures, and parking areas). However, these improvements would be constructed in compliance with pertinent provisions of the California Building Code⁶ (as RR 4.6-1), which would ensure the structural stability of the proposed improvements, and would be 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 improvements from strong seismic ground shaking. Impacts would be less than significant.

a)(iii) No Impact

While there are liquefaction hazards in the project area, the proposed trail alignment is not located in areas with liquefaction hazards, except of the segment on Duquesne Avenue connecting Culver City Park to the Ballona Creek Bike Path. This area is paved with the roadway and sidewalks. No trail improvements are proposed on Duquesne Avenue except for wayfinding signs. These signs would be built to withstand liquefaction hazards; therefore, there would be no impact.

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 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 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 trail alignment would go through the areas identified to have landslide hazards. Thus, trail users and trail improvements would be exposed to landslide hazards.

Grading and excavation associated with new trails and trail realignment, relocation, and/or repaving 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 improvement 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. 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 trail. Therefore, impacts from landslides would be less than significant.

⁶ 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.

b) Less Than Significant Impact

As stated, erosion has occurred in various areas of the KHSRA, Baldwin Hills Scenic Overlook, Culver City Park, and Stocker Street Corridor. Trails that follow the natural drainage flows (called fall line trails) have experienced significant erosion as storm waters have eroded the trail surfaces.

In the short term, ground disturbance associated with construction of the Project 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 and in disturbed areas.

In the long term, the proposed trail improvements would disturb ground surfaces and may create erosion hazards, especially on steep slopes. However, trail switchbacks are proposed in areas with steep slopes. Also, the paving of new trails, realignment of trails, relocation of trails, and provision of drain dips are specifically proposed to reduce the potential for erosion. Revegetation of disturbed areas adjacent to the trail alignment would also 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 subsidence⁷ 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 Five Points intersection and the center of the Inglewood Oilfield. 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. However, additional subsidence may have occurred in the northwestern section of the oilfield where oil drilling is currently most intensive.

The proposed trail alignment is not proposed in areas with active drilling operations. Therefore, subsidence hazards may exist near the trail, but are not expected along the proposed trail alignment. Also, the proposed trail improvements would not increase subsidence hazards in the area. No impacts related to subsidence would occur.

Through the years, 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 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. 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 slope failure, landslides, soil movement, collapse, and other hazards. Impacts would be less than significant.

⁷ Subsidence is defined as the settlement of overlying geologic materials due to the removal of large amounts of hydrocarbons and fluids.

d) Less Than Significant Impact

The Fox Hills relict paleosol, Baldwin Hills sandy gravel, and Culver sand are not expansive, but the Inglewood Formation has moderate expansion potential. Thus, trail improvements could be exposed to ground instability due to soil expansion. However, no habitable structures are proposed as part of the Project. The type and limited size of trail improvements also preclude the potential for major threats to life and property due to soil expansion. Compliance with RRs 4.6-1 RR 4.6-2 would ensure that the engineering design and construction of proposed trail improvements account for site-specific soil conditions, including soil expansion potential. Thus, impacts would be less than significant.

e) No Impact

The proposed Park to Playa Trail and the associated trail improvements do not propose the construction of 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 the trail alignment, with the proposed Valley Trail (Segment D) providing connection to an existing restroom facility in the KHSRA.

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 impacts would occur.

4.6.3 MITIGATION PROGRAM

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.

This RR shall be included in the Engineering Plans and as a note in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and approval 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. The recommendations of the geotechnical report shall be used in the engineering design and construction of proposed structures.

This RR shall be included in the Engineering Plans and as a note in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with these regulations, subject to review and

approval 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.

The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation prior to and during construction activities for the Proposed Project.

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.

4.7 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 4-9 shows the magnitude of GHG emissions on the global, national, State, and regional scales.⁸

**TABLE 4-9
COMPARISON OF WORLDWIDE GHG EMISSIONS**

Area and Data Year	Annual GHG Emissions (MMTCO ₂ e)
World (2006)	29,000
United States (2010)	6,822
California (2008)	478
Los Angeles County (2008)	93
MMTCO ₂ e: million metric tons of CO ₂ e; GHG: greenhouse gas	
Source: WRI 2009; USEPA 2012b; CARB 2010; SCAG 2008.	

GHGs, as defined under California’s Assembly Bill (AB) 32, include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). General discussions on climate change often include water vapor, ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed directly in the construction or operation of development projects, nor can they

⁸ GHG emissions for project-level analyses are commonly expressed in metric tons of carbon dioxide equivalent (MTCO₂e). 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 (MMTCO₂e). (Metric tons may also be stated as “tonnes”).

be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies, such as CARB, or climate change groups, such as the California Climate Action Registry (CCAR), as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, 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 CO₂. For example, since CH₄ and N₂O are approximately 21 and 310 times more powerful than CO₂, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 21 and 310, respectively (CO₂ has a GWP of 1). Carbon dioxide equivalent (CO₂e) 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 CO₂e. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 4-10.

**TABLE 4-10
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 ₂ O)	120	310
HFC-134a	14.6	1,300
PFC: Tetrafluoromethane (CF ₄)	50,000	6,500
PFC: Hexafluoroethane (C ₂ F 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 2010).

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 a quantitative GHG emissions significance criterion to date. Beginning 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 its staff proposal for an interim CEQA GHG significance threshold of 10,000 metric tons of CO₂ equivalent per year (MTCO₂e/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). However, these proposals have not yet been considered by the SCAQMD Governing Board.

At Tier 1 of the proposed approach, GHG emissions impacts would be 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 impact would be less than significant if a project is consistent with a previously adopted GHG reduction plan that meets specific requirements.⁹ At Tier 3, the Working Group proposes to extend the 10,000 MTCO₂e/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 MTCO₂e/yr threshold for all land use types or (2) separate thresholds of 3,500 MTCO₂e/yr for residential projects, 1,400 MTCO₂e/yr for commercial projects, and 3,000 MTCO₂e/yr for mixed use projects. There have been no proposals for recreation or infrastructure projects.

Construction GHG emissions from the Project were calculated by using CalEEMod Version 2011.1.1, 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 Proposed Project would be 15 MTCO₂e. 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 0.5 MTCO₂e/year.

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

⁹ 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).

(that provide carbon sequestration) would be removed, revegetation over a larger area would be provided as part of the Project. Therefore, there would be no anticipated increase in Project-related operational GHG emissions.

The estimated increase in annual GHG emissions, including amortized construction emissions, would be approximately 0.5 MTCO₂e/yr. This value is less than the proposed SCAQMD Tier 3 screening threshold of 3,000 MTCO₂e/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 Proposed 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

The California Legislature adopted the public policy position that global warming is “a serious threat to the economic well-being, public health, natural resources, and the environment of California” (*California Health and Safety Code* §38501). AB 32 is now codified as Sections 38500–38599 of the *California Health and Safety Code*. Thus, 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 statewide GHG emissions to 1990 levels by the year 2020. Statewide plans and regulations, such as GHG emissions standards for vehicles and the Low Carbon Fuel Standard, are being implemented; but compliance by individual projects is not addressed. The Proposed Project would not conflict with GHG plans and regulations. No impact would occur.

4.7.3 MITIGATION PROGRAM

Regulatory Requirements

None.

Mitigation Measures

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

4.8 <u>HAZARDS/HAZARDOUS MATERIALS</u>	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 (Segment H) is located on a parcel that was formerly used for oil drilling operations, and on-site soils were found to contain petroleum hydrocarbons at elevated levels. A property southwest of Culver City Park (Segment A) is also identified for voluntary cleanup and land use restrictions (DTSC 2012).

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 in the project area consist of industrial developments on Jefferson Boulevard; the SCE substation on La Cienega Boulevard (south of the KHSRA); dry cleaners at Stocker Street/La Brea Avenue; the Windsor Hills Elementary School on Overhill Drive; and the LA Microwave Station at the northeastern end of the KHSRA (USEPA 2012c).

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 several gasoline stations near Rodeo Road and industrial uses along Jefferson Boulevard, La Brea Avenue, and La Cienega Boulevard as facilities with underground fuel storage tanks and other cleanup sites that are located near the proposed trail alignment but are not located on the alignment (SWRCB 2012).

Oil Drilling Operations

The presence of numerous oil wells in the Baldwin Hills poses the potential for oil and gas seeps, although no gas seeps have been recorded in the project area (USGS 2011).

A National Pollutant Discharge Elimination System (NPDES) permit for the Inglewood oilfield was first issued in 1980, with subsequent Los Angeles RWQCB orders to limit the discharge of oil and grease and phenols into retention basins; to remove oils from the water surface; and to monitor water quality in the basins. A Spill Prevention Control and Countermeasure Plan is also in place to reduce the amount of oil discharged into retention basins serving the oilfield and to avoid oil discharges from entering the downstream storm drain system (Intera West 1994).

Oil drilling operations at the Inglewood oilfield have led to the contamination of surface soils with total petroleum hydrocarbons (TPH) from crude oil. Site remediation is provided through an on-site bioremediation system for the land treatment of excavated soils contaminated with petroleum hydrocarbons, in compliance with the RWQCB permit for the facility. Due to the depth of groundwater (50 feet below the ground surface for perched water and over 200 feet below the ground surface for the Silverado Aquifer), groundwater monitoring wells indicate that petroleum hydrocarbons from crude oil are not affecting the underlying groundwater (Entrix 1999).

The area with ongoing oil operations west of La Cienega Boulevard drains into the Dabney Lloyd catch basin/retention basin near the eastern end of the Blair Hills Corridor (Segment C). Hydrocarbons from oil drilling activities are likely to be present in the basin and the surrounding area (Intera West 1994). The BHRCA property in Segment C was subject to past oil drilling operations and was developed with oil wells, aboveground tanks, dirt roads, settling ponds, and pipelines. The oil well equipment and aboveground tanks are no longer present in this area, but dirt roads and oil well pads remain. Hydrocarbon-impacted soils are expected to be present due to historic oil operations and from abandoned oil wells. Also, 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 Segment C, where it enters a storm drain inlet at the northeastern corner of this area.

As stated above, Segment H (Eastern Ridgeline Trail) is located in an area where soils have been found to contain petroleum hydrocarbons at elevated levels. Based on soil and vapor sampling and the assessment of potential hazards in Segment H, the contaminants were determined to consist of diesel and motor oil range organic compounds, gasoline-range

hydrocarbons, and arsenic, which were all found below the surface and were similar to what has been found at other oilfield sites in the region.

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 designated 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).

Hazardous Materials Use

The ongoing maintenance activities at the KHSRA, Baldwin Hills Scenic Overlook (Segment B), and Culver City Park (Segment A) include the use of hazardous materials (i.e., cleaning solvents, fertilizers, pesticides, motor oil, and diesel fuel). The maintenance yard at the KHSRA is located south of Janice's Green Valley, where fertilizers, pesticides, diesel fuel and other hazardous materials are stored. Contaminated soil has also been found southeast of the KHSRA maintenance yard (CDPR 2002b). Elevated levels of total petroleum hydrocarbons (TPH) from oil and diesel and high methane concentrations were detected in soil borings along the Eastern Ridgeline Trail (Segment H) in 2005 and 2011. Precautionary measures have been recommended to prevent hazards during construction and grading activities for County-proposed improvements to the Eastern Ridgeline Trail (URS 2012).

Airports

The nearest airports to the proposed trail alignment are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX).

The Santa Monica Municipal Airport is located at 3223 Donald Douglas Loop, approximately 3.5 miles west of Culver City Park (Segment A). This airport has 2 runways and 1 helipad, and serves as the base for 267 single-engine, multi-engine, jet airplanes and helicopters. It had 452 operations per day in 2011 (AirNav 2012b). The Airport Influence Area for this airport does not include the proposed trail alignment (ALUC 2003b).

LAX is located at 1 World Way, approximately 4.0 miles southwest of the Baldwin Hills area. This airport has eight runways and serves as a base for six aircraft, including jet airplanes and military aircraft. It had an average of 1,187 aircraft operations per day in 2011 (AirNav 2012a). The Airport Influence Area for this airport does not include the proposed trail alignment (ALUC 2003a).

Pipelines and Transmission Lines

There are several hazardous liquid or high-pressure gas transmission lines in or near Baldwin Hills. These include a natural gas pipeline owned by BP West Coast Products that runs along La Brea Avenue and Overhill Drive and then southeasterly and southerly to Long Beach; a Southern California Gas Company natural gas transmission pipeline from the KHSRA running in a southwesterly direction to Playa del Rey; two natural gas pipelines owned by Chevron running in a southerly direction from the KHSRA; crude oil pipelines of the Plains Exploration and Production Company in La Cienega Boulevard; and Chevron's gasoline, diesel, and/or jet fuel and crude oil lines from wells located east and west of La Cienega Boulevard (PHMSA 2012).

South of the KHSRA, there are high-voltage power transmission lines on towers running parallel to and west of La Brea Avenue that turn in a westerly direction along the south side of Stocker Street and then in a northerly direction through the KHSRA and west of the alignment of Fairfax Avenue to a substation on Jefferson Boulevard. High-voltage power lines also run on the east side of La Cienega Boulevard through the Baldwin Hills. In addition, several communication towers are located on the ridgelines near Culver City Park and at the KHSRA.

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 (Segments C [Blair Hills Corridor], Segment B [Baldwin Hills Scenic Overlook], and Segment A [Culver City Park]) (CAL FIRE 2011). Exhibit 4-15 shows identified wildfire hazard areas.

4.8.2 IMPACT ANALYSIS

a) Less Than Significant Impact

No long-term hazardous materials transport, use, or disposal is expected with the proposed Park to Playa Trail, and no change in hazardous materials storage would occur with the Project. The construction of the proposed trail improvements would require limited use of hazardous materials and intermittent trail maintenance by the existing park operators would largely remain the same. The Project would not create a significant hazard to the environment. Therefore, impacts would be less than significant.

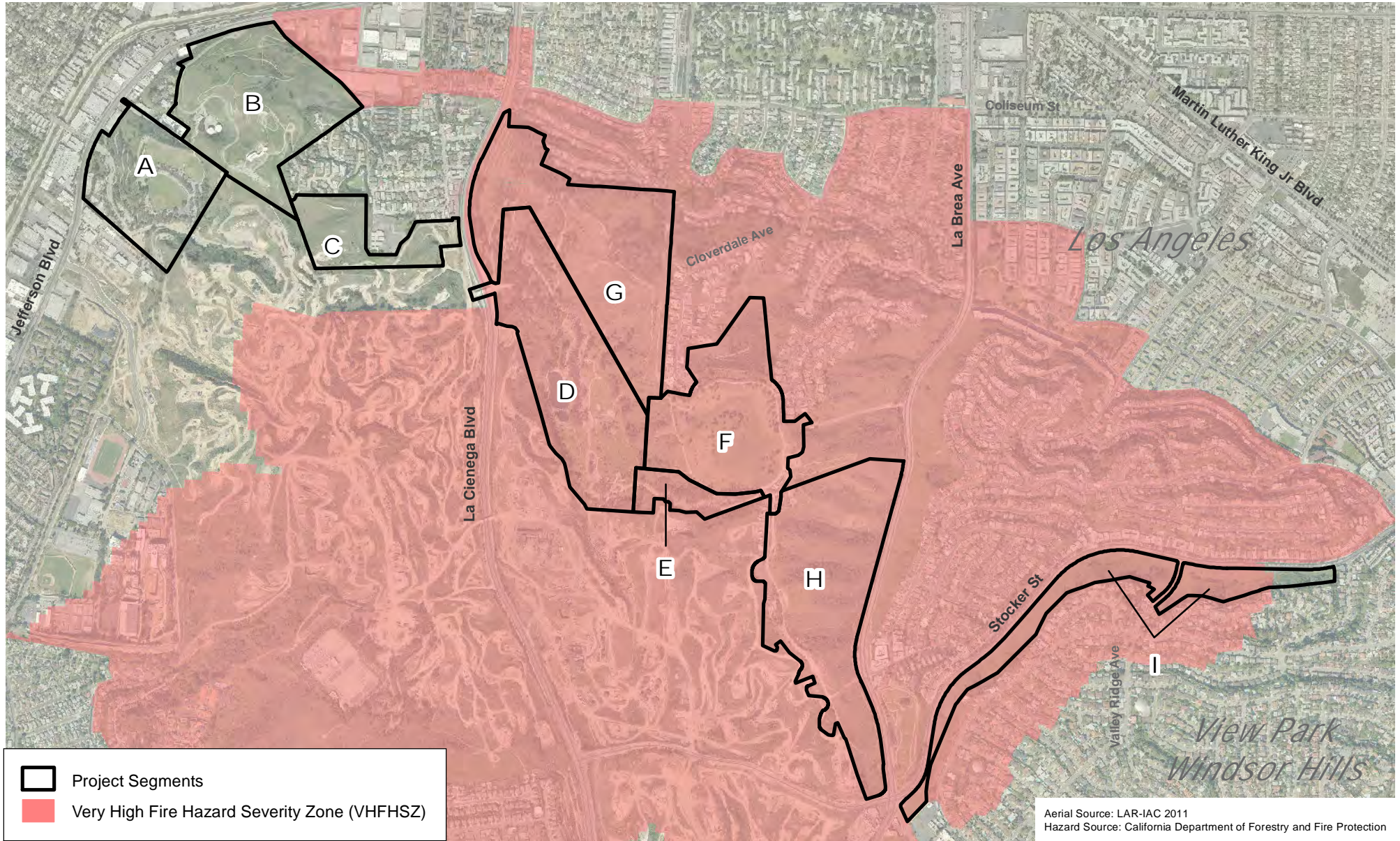
b) Less Than Significant Impact with Mitigation

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 several 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 pipeline's owner/operator and their approval and monitoring of activities near the pipeline 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.

While the proposed trail alignment would pass under power transmission lines, the trail would be at-grade, and the trail improvements (i.e., signs and kiosks) would not be high enough to affect the transmission lines. No adverse impacts would occur. However, coordination with SCE would be necessary to ensure that access to the transmission lines is not precluded by any of the proposed trail improvements.

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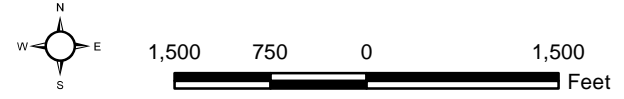
- Project Segments
- Very High Fire Hazard Severity Zone (VHFHSZ)

Aerial Source: LAR-IAC 2011
 Hazard Source: California Department of Forestry and Fire Protection

Wildfire Hazards

Exhibit 4-15

Park to Playa Trail



(Rev: 11-30-2012 CJS) Projects\Alta\J003\Graphics\IS-MND\Ex_wildfire_hazards.pdf

Maintenance activities for the proposed trail is likely to utilize hazardous materials in limited quantities, such as paints, thinners, cleaning solvents, fertilizers, pesticides, and automotive substances in maintenance equipment. Existing trails are subject to maintenance activities that would not change with the Project. New trails will be subject to maintenance that would be similar to existing maintenance activities. Hazardous materials for maintenance would be brought to the trail by the maintenance crew and not stored along the trail or at proposed gateways and trailhead. Rather, hazardous materials would be stored at maintenance facilities/yards at the Baldwin Hills Scenic Overlook and the KHSRA. Compliance with RR 4.8-1 on the use, storage, and disposal of hazardous materials would prevent the creation of significant impacts. With project compliance with existing regulations, 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 numerous 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 abandonment would have to be followed (RR 4.8-3) to prevent potential contamination of soils, groundwater, or other natural resources; to prevent damage to geothermal resources; and to protect life, health, environment, and property.

There is known soil contamination along Segment H (Eastern Ridgeline Trail) from past oilfield wastes. While the construction and maintenance crew and trail users may be exposed to petroleum hydrocarbons, this exposure would also be short-term and intermittent. The risk screening for the Eastern Ridgeline Trail indicates that no significant risk to park visitors, maintenance workers, or construction workers would occur. Nuisance odors may occur during construction, but would not be a health hazard. Therefore, the DTSC has allowed the County to construct trail improvements subject to the implementation of soil management practices that would further reduce hazards to the construction crew and trail users (DTSC 2005; URS 2012). For the Park to Playa Trail, the proposed signs along Segment H and the entry kiosk and revegetation at the eastern end of this segment would have to implement the same soil management practices, as outlined in MM 4.8-1 below. Impacts would be less than significant after mitigation.

Past oil drilling operations in the Blair Hills Corridor (Segment C) may have left remnant facilities (i.e., pipelines, pads, and well casings) and oil residuals that could pose public health and safety hazards to the construction crew during ground disturbance and to trail users. While the alignment of the proposed trail in this segment has been located along the edges of the property farthest from oil drilling operations, there are soils with elevated levels of total volatile petroleum hydrocarbons (TVPH), total extractable petroleum hydrocarbons (TEPH), and arsenic in Segment C. This contamination is expected to be similar to that found at other oilfield sites, such as Segment H.

While no preliminary endangerment assessment has been completed for Segment C, exposure of the construction and maintenance crews and trail users to these contaminants is expected to be below the risk thresholds, similar to that discussed for Segment H above. 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 construction of trail improvements; and the lack of human contact with contaminated soils during trail use. Implementation of soil management practices, as outlined in MM 4.8-1 below, would reduce impacts to less than significant levels after mitigation.

The County of Los Angeles has adopted building standards 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 combustion would occur with the Project. The proposed trail and trail improvements would not produce methane or affect existing methane migration and concentrations in the Baldwin Hills area.

Impacts would be less than significant with compliance with existing hazardous material regulations and implementation of MM 4.8-1.

c) Less than Significant Impact

The Windsor Hills Elementary School is located just south of the western end of the Stocker Corridor Trail, and several other schools (i.e., West Los Angeles College, Marlton School, and Happyland Pre-school) are located within 0.25 mile of the proposed trail alignment. However, the proposed trail alignment and trail improvements would not pose a significant hazard to the students and faculty of the Windsor Hills Elementary School or the other nearby schools due to the lack of routine hazardous materials use associated with the long-term trail use and minor and intermittent maintenance activities. 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 sensitive land uses. Impacts would be less than significant.

d) Less Than Significant Impact with Mitigation

As stated above, Segment H (Eastern Ridgeline Trail) of the Park to Playa Trail is listed in government databases as a hazardous materials user/generator subject to clean up activities. Trail improvements proposed on Segment H are limited to signs, an entry kiosk, and revegetation at the eastern end of this trail. Precautionary measures to avoid health hazards associated with the contaminated soils in this area have been developed and would have to be implemented by the Project as MM 4.8-1. Impacts would be less than significant with the implementation of MM 4.8-1.

While there are several industrial and commercial sites near the trail alignment that are listed in government databases as hazardous material users and hazardous waste generators, the proposed trail improvements would not be located on or near these users/generators. Therefore, the Project would not expose trail users to hazards associated with these adjacent developments.

e, f) No Impact

As discussed above, the nearest airports to the Baldwin Hills area are the Santa Monica Municipal Airport and LAX. The trail alignment is not located within the airport influence area of the Santa Monica Municipal Airport or LAX. Therefore, the Proposed 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 Proposed Project would involve construction on and near public roadways used for emergency response or evacuation. These roadways include Stocker Street, La Brea Avenue, Valley Ridge Avenue, La Cienega Boulevard, Jefferson Boulevard, Hetzler Road, and

Duquesne Avenue. The trail improvements along La Cienega Boulevard, Jefferson Boulevard, Hetzler Road, and Duquesne Avenue would not block traffic flows. During the construction phase for proposed crosswalks, sidewalks and bike path/sidewalk, some roads could be partially blocked by construction activities, equipment, and crew but these roads would remain 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 Proposed 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 drilling operations west of La Cienega Boulevard and south of the Blair Hills Corridor) is fenced, and a barrier fence is proposed along the new trail in this corridor to further prevent unauthorized users near the 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 proposed trail alignment would pass through developed park areas and undeveloped open space. While weed control and maintenance activities have minimized the potential for wildfire hazards in developed park areas, undeveloped areas retain their potential for brush fires.

The trail segments in Culver City (Segment A [Culver City Park], Segment B [Baldwin Hills Scenic Overlook], and Segment C [Blair Hills Corridor Trail]) are located outside designated wildfire hazard areas. The trail segments in the County and City of Los Angeles (Segments D through I) are located in designated Very High Fire Hazard Severity Zones.

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 Stocker Corridor and will be responsible for managing the Blair Hills Corridor Trail. Therefore, RR 4.8-4 shall be implemented throughout the Park to Playa Trail alignment.

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 along the trail during construction and use. While this regulation applies to land in the City of Los Angeles, the posting of such along the Park to Playa Trail could reduce the incidence of wildfire along the

entire trail. Therefore, RR 4.8-5 shall be implemented throughout the Park to Playa Trail alignment.

New trails and trail improvements in developed park areas of the KHSRA, the Baldwin Hills Scenic Overlook, and Culver City Park would not be exposed to wildfire hazards. Trail improvements in or near undeveloped areas of the KHSRA would be exposed to wildfire hazards but would not be highly susceptible to fire due to the type of improvements (i.e., natural surface trail or trail paving with DG or colored concrete and the predominant use of concrete, aggregates, and metals for trail amenities such as signs, benches, concrete masonry unit (CMU) stairs, retaining walls, trash receptacles, railings, and fences). Wildfire hazards to the trail alignment and trail improvements would not be significant.

Future increases in the number of trail users may increase the potential for accidental brush fires and may expose more people to wildfire hazards. However, in compliance with RR 4.8-4 and RR 4.8-5, warning signs (e.g., no smoking signs) would be provided to educate the public on preventing brush fires. Also, the Project would provide fencing in select areas to prevent public access to adjacent oil drilling activities and to discourage hiking in wildland areas. 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 alignment. Impacts from the Proposed Project would be less than significant.

4.8.3 MITIGATION PROGRAM

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 BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with pertinent hazardous material regulations during construction and maintenance activities for the Park to Playa Trail.

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 BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with these regulations during construction activities near or across underground utility lines.

RR 4.8-3 In the event that proposed trail improvements would be located on or near abandoned oil wells, 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; a 10-foot building setback; maintenance of 50-foot access; and provision of vent combs.

The BHRCA shall include this RR as a note in the Contractor Specifications. 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 BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation during construction and maintenance activities along the Park to Playa Trail.

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 the Park to Playa Trail, which outline prohibitions on open burning, smoking, flaming or glowing objects, and open flames.

The BHRCA shall include this RR in the Engineering Plans and in the Contractor Specifications. The Engineer shall include the required signs in the project plans; the Contractor shall install the required signs; and the Contractor shall comply with these regulations during construction and maintenance activities along the Park to Playa Trail.

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.

The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation prior to and 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 BHRCA shall include this RR as a note in the Contractor Specifications. 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 BHRCA shall include this RR as a note in the Engineering Plans and in the Contractor Specifications. The Engineer shall design and the Contractor shall construct all improvements on public roadways in accordance with the MUTCD.

Mitigation Measures

MM 4.8-1 The Contractor shall implement the following soil management practices during grading and construction activities along Segment C (Blair Hills Corridor Trail) and Segment H (Eastern Ridgeline Trail):

- Field oversight of grading operations, including spot checks of soils with a photo-ionization detector (PID) for volatile organic compounds (VOCs) and X-ray fluorescence (XRF) for metals, is recommended with California Department of Toxic Substances Control (DTSC) concurrence.
- Direct contact with total petroleum hydrocarbon (TPH) contaminated soils by human bodies shall be avoided (due to aesthetic or odor concerns). All construction and maintenance workers shall be trained to avoid direct contact with TPH-contaminated soils (e.g., wearing plastic or rubber gloves).
- Any on-site, TPH-contaminated soils exposed or excavated may remain on site; however, at least two feet of clean fill material (imported or from on-site sources) shall be placed over the TPH-contaminated areas where potential contact may occur. With a cap of two feet of clean fill, no direct contact or potential health risks would be anticipated from the site's intended use, namely recreational use of trails.
- Proper disposal requirements imposed by the disposal facility shall be followed if off-site disposal of TPH-contaminated or stockpiled soils is planned.

- While no unacceptable risks or hazards were identified for the intended land use (namely recreational use of trails), any other use of the site shall require additional site characterization and a human health risk evaluation.
- Enclosed structures (e.g., restrooms) shall not be constructed on site due to a potential for methane vapor intrusion and accumulation, unless otherwise specially approved by DTSC. Any future structures shall require additional characterization (e.g., soil gas survey) and evaluation of the potential for vapor intrusion, including the potential for accumulation of explosive levels of methane.

The BHRCA shall include this MM as a note in the Contractor Specifications. The Contractor shall comply with this mitigation during construction activities on Segments C and H.

4.9 <u>HYDROLOGY AND WATER QUALITY</u>	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.9.1 ENVIRONMENTAL SETTING

Ballona Creek Watershed

The Baldwin Hills are located in the Ballona Creek Watershed, which is an approximate 130-square-mile watershed in the western section of Los Angeles County. The hills and the surrounding 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 a 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. The Baldwin Hills are located east of the Creek, approximately 5.5 miles from the Pacific Ocean.

Aside from the Ballona Creek, there are no natural surface water bodies in the project area, although 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 drilling operations also have small, scattered retention basins or collection basins supporting oil drilling activities. 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 5 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

Storm water runoff from the Baldwin Hills Scenic Overlook (Segment B) and Culver City Park (Segment A) drains as sheet flow toward local streets and underground drainage lines, and thereafter into the Ballona Creek.

There is a flood-control basin in the Blair Hills Corridor (Segment C) that detains storm water from the Baldwin Hills Scenic Overlook for ground percolation, with overflows going into a V-ditch that runs in easterly and then northerly 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 Inglewood oilfield drains in a northeasterly direction toward the Dabney Lloyd catch basin/retention basin, and an NPDES permit for the oilfield was first issued in 1980. The Los Angeles RWQCB also added subsequent orders to limit the discharge of oil and grease and phenols into the basin and to remove oils from the water surface (Intera West 1994). From the basin, storm water flows northerly across and eastern end of Segment C toward storm drain pipes at the northeastern corner, which conveys runoff in a northerly direction into underground pipes 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 natural 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 in Segment C.

Storm water drainage at the eastern section of the KHSRA generally flows in an easterly direction as sheet flow and through natural drainage channels on the slopes and into catch basins and drainage pipes along La Brea Avenue. Runoff at the Stocker Street Corridor (Segment I) flows down the slopes toward catch basins in Stocker Street.

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 all these pollutants. 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 identified the Dabney Lloyd catch basin/retention basin in the oil production area at Blair Hills 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 west on Rodeo Road to the Ballona Creek as Zone X (areas within the 500-year floodplain). All other areas along the trail alignment are outside the 500-year floodplain (FEMA 2008). Exhibit 4-16 shows flood hazards in the project area.

Groundwater

The Baldwin Hills overlie the Coastal Plain of Los Angeles Groundwater Basin, with the Newport-Inglewood Fault Zone dividing the Central Basin (northeast section of hills) from the West Coast Basin (southeast section of hills) and the Santa Monica Basin (western section of hills). The elevation of the Baldwin Hills, the uplift of the Newport-Inglewood Fault Zone, and the low permeability of sedimentary rocks have precluded groundwater extraction in the hills. Groundwater levels southeast of the Baldwin Hills area have been recorded at elevations ranging from 10 to 30 feet below mean sea level in 2005 (MWD 2007).

Soil testing in the Inglewood oilfield in 1991 indicated that perched groundwater was present at approximately 50 feet below the ground surface. However, this water was not suitable for potable use. The Silverado aquifer that underlies the Baldwin Hills is a potential drinking water source, but is located more than 200 feet below the ground surface. Groundwater monitoring wells at nearby oil drilling operations have been found to be free of dissolved petroleum hydrocarbons (Entrix 1999).

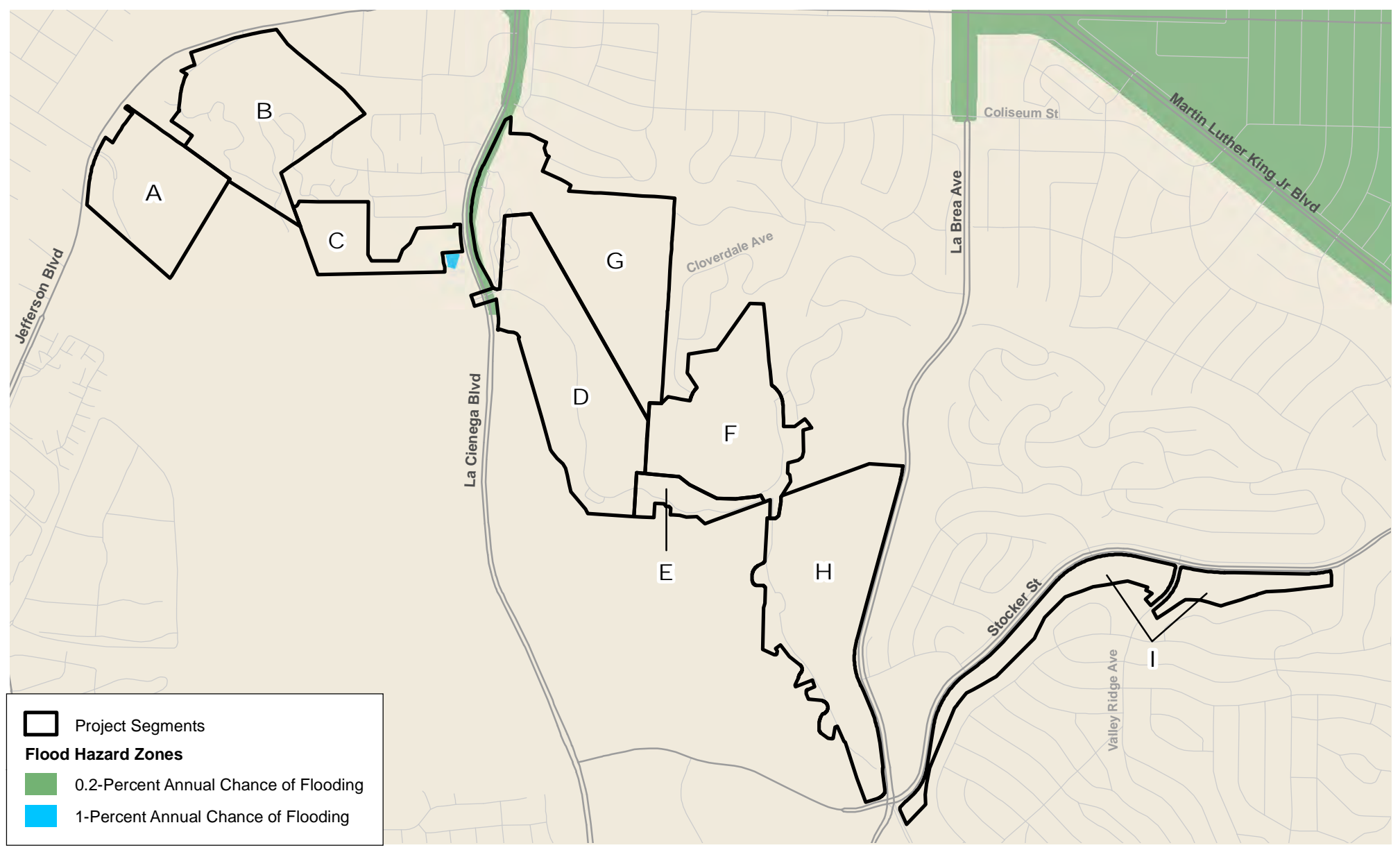
4.9.2 IMPACT ANALYSIS

a, f) Less Than Significant Impact

Construction of the Proposed Project would have the potential to contribute sediment, trash, debris, and pollutants into drainages near the proposed trail alignment and ultimately, in the Ballona Creek and Centinela 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 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.

Since construction of the proposed trail improvements would disturb more than one acre of land area, the Project would be subject to the Statewide Construction General Permit (Order 2009-0009-DWQ). Compliance with the General Permit requirements include the implementation of erosion-control and sediment-control measures, tracking control, hazardous material and waste management measures, 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) for the Contractor to monitor,

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Project Segments

Flood Hazard Zones

- 0.2-Percent Annual Chance of Flooding
- 1-Percent Annual Chance of Flooding

Flood Hazards

Park to Playa Trail

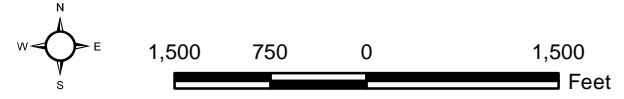


Exhibit 4-16



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clean up, and report any hazardous material discharges that may contaminate waters. Therefore, construction debris and other construction-related substances that would be released into area drainages, catch basins, storm drain pipes, and eventually into Ballona Creek would be reduced to the extent practicable.

No long-term adverse change in storm water runoff quality would occur with the Proposed Project. The proposed trail improvements would not include restrooms or kitchen facilities that would generate wastewater that may affect long-term storm water quality from the Park to Playa Trail and in Ballona Creek and Centinela Creek. The proposed trailhead with a parking area at the western end of Segment I (Stocker Street Corridor) would be paved with gravel. Thus, pollutants from parked vehicles would not run off the site or enter the storm drain system.

Use of the trail may lead to trash and debris from hikers, bicyclists, and dog walkers, but there are trash cans in the public parks and trash receptacles would be provided at the proposed trailhead to reduce trash and debris that may enter local storm drains. 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 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 these regulations for minimizing pollutants in storm water runoff. Since these 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.

Compliance with RRs 4.9-1 and 4.9-2 would reduce potential water quality impacts from long-term use of the Park to Playa Trail and from short-term construction activities to less than significant levels.

b) Less Than Significant Impact

While the Baldwin Hills overlies the West Coast, Central, and Santa Monica groundwater basins, the Proposed Project would not directly impact groundwater resources since excavation activities (for signs, shade structures, benches, trails, revegetation, fencing, railings, and parking area) are not expected to be deep enough to affect the underlying groundwater resources found over 200 feet below the ground surface or perched groundwater at 50 feet below the ground surface. Also, the Project would not interfere with groundwater recharge since the proposed trail alignment would not go through designated recharge areas for the groundwater basins. While impervious surfaces associated with the proposed trail improvements (i.e., paved trails, sign foundations, fencing, and benches) would decrease ground percolation of storm water, these would occur on relatively small, scattered areas and there are nearby open areas where storm water would be allowed to percolate.

The restoration of the drainage channel in Segment E (Hilltop Connector Trail) would increase runoff percolation in the KHSRA. However, underlying water resources are not suitable for potable use. The Project would have no direct impact on groundwater quality or quantity.

The City of Los Angeles Department of Water and Power (LADWP) (which serves the KHSRA) had a total water supply of 168 billion gallons during the 2010–2011 fiscal year, of which, 11 percent was from local groundwater resources (LADWP 2012). The Golden State Water Company (GSWC) serves Culver City and obtains all of its water supply from imported water sources (GSWC 2011). The California American Water Company provides water to the Windsor Hills area and obtained all of its 2010 water supply (1.1 billion gallons) from groundwater sources in the Central Basin and the West Coast Basin (California American Water 2012b).

Water for construction activities would be used 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 210,000 square feet of land, which would utilize approximately 4.6 million gallons per year for drip irrigation. This would present a long-term demand for potable water and groundwater supplies. This water demand would represent less than 0.02 and 0.4 percent of the total groundwater supplies provided by LADWP and California American Water Company, respectively, if only one these companies served the Project. Replacement of existing turf irrigation with drip irrigation systems at three locations along the Park to Playa Trail in the KHSRA would further reduce the amount water currently used in these areas.

Due to the type and limited size of the proposed trail improvements, impacts on groundwater resources during construction and for long-term irrigation would be less than significant.

c, d, e) Less Than Significant Impact

The Proposed Project would result in changes in local drainage patterns due to proposed grading for the construction of new trails, a trailhead, a shade structure, and an interpretive node and for proposed drain dips, drainage channel restoration, retaining wall, steps, and other trail improvements (i.e., signs, trail repaving, boardwalks, crosswalks, and revegetation).

New trails are proposed in the Baldwin Hills Scenic Overlook (Segment B) and in the Blair Hills Corridor (Segment C), which would be located within the drainage area for the overlook and the retention basin in Blair Hills Corridor. However, these trails would be natural surface trails and decomposed granite trails 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 through the Connection to the Baldwin Hills Scenic Overlook Trail and the retention basin in the Blair Hills Corridor toward Blair Hills Park. Where drain dips are proposed in Segment D (Valley Trail) and Segment G (Western Ridgeline Trail), these would follow existing drainage flows and would reduce the potential for erosion but would not change drainage flows.

Changes in drainage patterns due to the Project would be localized and relatively minor since the majority of the trails are existing and the proposed trail improvements would be located at scattered locations. The general ground surface elevations of the Baldwin Hills would be maintained, except at isolated areas where drain dips and switchback reconstruction are planned; where steps, retaining walls, and realigned trails are necessary; and in small scattered areas where trail amenities would be built. Therefore, 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 and Centinela Creek).

A concrete-lined drainage channel in the KHSRA (running along the KHSRA access road in Segment E [Hilltop Connector Trail]) is proposed for reconstruction as a vegetated swale through the removal of the concrete and relining of the channel with natural rock. This modification will allow percolation of storm water and will decrease the flow volume and rate in downstream areas. Beneficial impacts on water quality would occur with this improvement.

Where impervious surfaces associated with sign posts and other scattered foundations (for benches, shade structure, interpretive node, and fences) would be created, runoff through these areas is expected to percolate into adjacent pervious surfaces as it does currently, with no significant increase in runoff volumes or rates at downstream areas. 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 and Centinela 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 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 or the 500-year floodplain. Also, most trail improvements would be at-grade, while others would result in small and scattered impervious surfaces that would not impede runoff flows to a degree as to create flood hazards. No increase in the potential for exposure to flooding would occur with the Project. Thus, there would be no impact related to flooding.

i) Less than Significant Impact

The Baldwin Hills are not located within identified dam inundation areas due to its elevation, 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). Failure of either of these dams would lead to the inundation of Duquesne Avenue and Jefferson Boulevard. However, implementation of the emergency action plans, which identify actions for warning,

evacuation, and post-disaster recovery that will be followed in the event of dam failure, would warn trail users on these roads and would readily allow for evacuation to areas outside the inundation zones. The Baldwin Hills is located 6.0 and 7.5 miles from the Lower Franklin Dam and the Mulholland Dam, respectively. Therefore, trail users would have enough time to evacuate prior to floodwaters reaching the area. Prevention, warning, and emergency actions are in place, which would reduce hazards to persons and property on the Park to Playa Trail in the event of dam failure. Impacts relating to dam inundation would be less than significant.

j) Less than Significant Impact

The Gwen Moore fishing lake in the KHSRA could pose seiche hazards to the surrounding area, which includes the lower picnic area and the proposed Valley Trail (Segment D) to the east. The lotus pond in the Japanese Garden may also 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 the proposed Blair Hills Corridor Trail (Segment C) that would be located east and north of this basin. 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 trail improvements.

The retention basin in the Blair Hills Corridor does not contain water for long periods of time and therefore, does not pose seiche hazards. The trail proposed across this basin (in Segment C) could be exposed to flooding and mudflow hazards, but trail users are not expected to use 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.

The Tsunami Inundation Map for Los Angeles County shows that the Baldwin Hills area would not be subject to inundation in the event of a tsunami (CalEMA 2009). Therefore, the proposed trail improvements and users of the Park to Playa Trail would not be exposed to tsunami inundation hazards.

Steep slopes in the Baldwin Hills have generated mudflows during major storms in the past. Although the proposed trail and trail improvements could be subject to mudflows, 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, and this hazard would not be exacerbated by the Project. Rather, proposed drain dips would direct storm water away from the trails and reduce the potential for erosion and mudflows.

The users of the proposed Park to Playa Trail could be exposed to mudflow hazards from natural drainages that are located near the trail alignment. However, trail users can readily leave the trail during major storms and can stay out of areas where debris flows and mudflows are occurring. Impacts would be less than significant.

4.9.3 MITIGATION PROGRAM

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.

The BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation prior to and 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 BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation during construction and maintenance activities along the Park to Playa Trail.

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.

This RR shall be included in the Engineering Plans and as a note in the Contractor Specifications. The Project Engineer shall design the proposed trail improvements in accordance with this regulation, subject to review and approval during the plan check process. Approved plans shall be implemented by the Contractor.

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.

4.10 <u>LAND USE AND PLANNING</u>	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.11 ENVIRONMENTAL SETTING

Existing Land Uses

The Baldwin Hills area is surrounded by urban development, with residential tracts built on the northern and western slopes of the hills, while the west-central and south-central portions of the hills are under oil production. Industrial developments are generally located along Jefferson Boulevard and commercial uses are present at major intersections. However, a large portion of the Baldwin Hills has been protected as public parks or preserved as permanent open space. Public parks include the KHSRA, Baldwin Hills Scenic Overlook, Culver City Park, Blair Hills Park, Ruben Ingold Park, and Norman Houston Park. The proposed alignment for the Park to Playa Trail would pass through or be located near these public parks and open space areas in the Cities of Los Angeles and Culver City and the unincorporated area of the County.

Planned Land Uses

The land use designations for most of the trail alignment is Open Space, except for the section of the Stocker Street Corridor (Segment I) near Valley View Ridge, which is designated as Medium Density Residential; the section of the Hilltop Connector Trail (Segment E) crossing the SCE right-of-way in the KHSRA, which is designated as Public and Semi Public Facilities in the County Land Use Plan; a section of the Western Ridgeline Trail (Segment G) crossing the SCE right-of-way as Public Facilities in the City of Los Angeles Land Use Map¹⁰; and the Baldwin Hills Scenic Overlook (Segment B) and a portion of the Blair Hills Corridor (Segment C), which is designated by Culver City as Low Density Multi-Family.

The applicable zoning for the trail alignment includes Heavy Agriculture, Single-Family Residence, Limited Multiple Residence, Commercial Planned Development, and Residential Planned Development under the County (for Segments D, E, G, H, and I); Open Space (for Segments A, B, and C) and Single Family Residential (for a portion of Segment C) in Culver City; and Open Space and Public Facilities (Segments F and G) in the City of Los Angeles.

The land use designations and zoning along each trail segment is provided in Table 4-11 below.

¹⁰ The City is currently updating the *West Adams-Baldwin Hills-Leimert Community Plan* and the draft plan does not propose any changes to the current land use designations in the City-portion of the KHSRA.

**TABLE 4-11
LAND USE AND ZONING**

Segment/Jurisdiction	Land Use Designation	Zoning
Segment A (Culver City Park)		
City of Culver City	Open Space	Open Space
Segment B (Baldwin Hills Scenic Overlook)		
City of Culver City	Low Density Multi-Family	Open Space
Segment C (Blair Hills Corridor)		
City of Culver City	Open Space	Single Family Residential
	Low Density Multi-Family	Open Space
Segment D (Valley Trail)		
County of Los Angeles	Open Space	Heavy Agriculture
		Single-Family Residence
Segment E (Hilltop Connector Trail)		
County of Los Angeles	Open Space	Limited Multiple Residence
	Public and Semi Public Facilities	Heavy Agriculture
Segment F (Janice's Green Valley Loop Trail)		
City of Los Angeles	Open Space	Open Space
Segment G (Western Ridgeline Trail)		
County of Los Angeles	Open Space	Single-Family Residence
City of Los Angeles	Open Space	Open Space
	Public Facilities	Public Facilities
Segment H (Eastern Ridgeline Trail)		
County of Los Angeles	Open Space	Heavy Agriculture
Section I (Stocker Street Corridor)		
County of Los Angeles	Medium Density Residential	Residential Planned Development
	Open Space	Residential Planned Development
		Commercial Planned Development
Sources: County of Los Angeles 2012b; Culver City 2007a, 2007b; City of Los Angeles 2012a.		

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. With implementation of the Master Plan, it is anticipated that a 1,400-acre urban park would be created in Baldwin Hills (CDPR 2002a).

The Recirculated Draft Kenneth Hahn State Recreation Area General Plan Amendment and Environmental Impact Report serves as the master plan for the KHSRA, Baldwin Hills Scenic Overlook, and County-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

¹¹ This property has since been transferred to the BHRCA.

Management Zones, while at the same time protecting the area's natural and cultural resources in designated Resource Protection Management Zones. Exhibit 4-17 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 (CDPR 2002b).

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.

4.11.1 IMPACT ANALYSIS

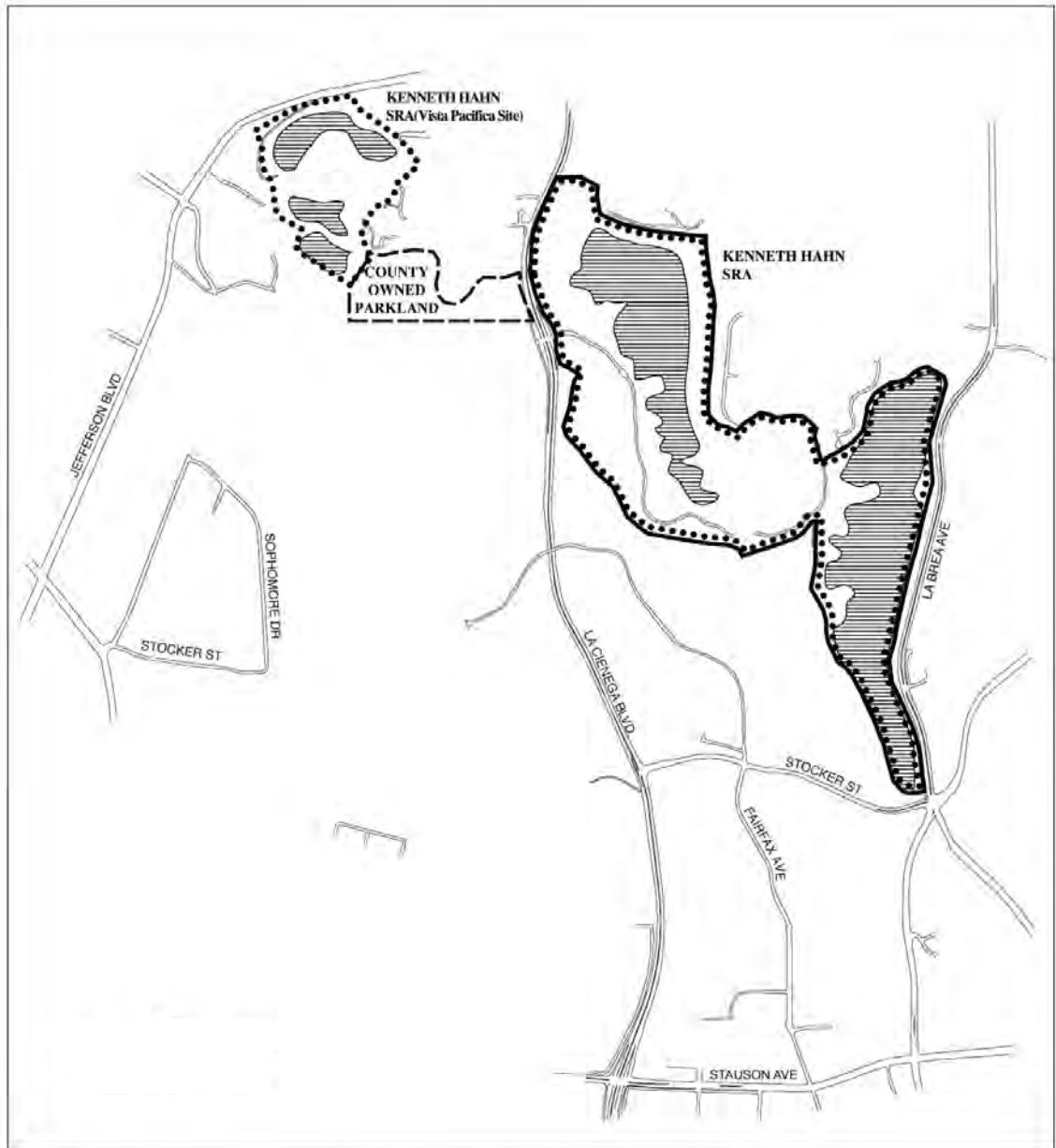
a) No Impact


The proposed trail alignment would coincide with existing trails in public parks and open space areas, and would develop new trails in undeveloped areas and developed parks. The proposed trail improvements 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 near the trail alignment or in the adjacent residential communities of Ladera Heights (to the south of the hills); Windsor Hills and View Park (to the southeast); Baldwin Hills (to the east); Baldwin Vista and Baldwin Village (to the north); and East Culver City (to the west and northwest). Since the Project would not divide an established neighborhood, no impact would occur.

b) Less than Significant Impact

The Proposed Project would not change the current land uses of existing trails and within developed parks and open spaces. However, it would change undeveloped lands in the Blair Hills Corridor and at the Five Points intersection (intersection of Stocker Street, La Brea Avenue, and Overhill Drive) into recreational uses. Specifically, the BHRCA parcels in the Blair Hills Corridor (Segment C) would be developed with a new trail to connect the KHSRA to the Baldwin Hills Scenic Overlook (Segment B). An interpretive node along this new trail is also proposed. Aside from new trails and reconstruction of existing trails in the KHSRA, a shade structure is proposed in Segment G (Western Ridgeline Trail). Also, a trailhead is proposed at the Five Points intersection that would provide improved connections between the Stocker Corridor Trail (Segment I), Ruben Ingold Park, Norman Houston Park, and the KHSRA.

Since the proposed trail project is 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. Therefore, no conflict with the Open Space and Public Facility land use designations and zoning in the Cities of Los Angeles and Culver City and in unincorporated County areas would occur.



-  Resource Protection Management Zone
-  Beneficial 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 4-17

Park to Playa Trail



Map not to scale



While not necessarily permitted in the Heavy Agriculture, Commercial, and Residential land use designations and zoning in the County of Los Angeles and in Residential land use designations and zoning in the Cities of Los Angeles and Culver City, the proposed trail would not be inconsistent with these land use designations 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 and open space. The proposed trail and trail improvements would not lead to any land use incompatibility with residential and agricultural 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 Proposed Project would not provide a major impetus to the Baldwin Hills Park Master Plan's development of a large urban park, it will provide better connections between the various parks and recreational facilities in the Baldwin Hills. As such, the Project would not conflict with this park master plan and no adverse impacts 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 and trail improvements (i.e., fences, node, trailhead, and signs) in Segments B through H¹² 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 implementation of 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 Blair Hills Corridor (Segment C), which would be open to public use, and the development of the trailhead at the Five Points intersection.

The Resource Management goals for the KHSRA are listed below in Table 4-12, along with the Project's consistency with each goal.

**TABLE 4-12
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, the proposed trail alignment would not restrict the movement of wildlife in the area.
Maintain, protect, and/or improve habitat for special status species	Disturbed areas along the trail would be revegetated with native plants. Habitat restoration is planned along Segments C, D, E, H, and I of the trail.
Manage the park to protect and restore natural watershed functions	Trail alignment and design avoid cuts across drainage flows; provide drain dips along existing trails; and include restoration of a drainage channel on Segment E to a more natural state.

¹² Only Segments B through H are within the boundaries addressed by the KHSRA General Plan Amendment.

**TABLE 4-12
CONSISTENCY WITH KHSRA GENERAL PLAN AMENDMENT**

Goal*	Project Consistency
Prevent outside disturbances from having adverse impacts on park resources to the extent practicable	No development is planned outside the boundaries of the trail alignment.
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. Habitat restoration is planned at five locations along the trail.
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. Habitat restoration is planned at five locations along the trail.
Provide appropriate open space buffers	Fences would be provided between the trail and adjacent oil operations while existing walls and fences 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.
Recreational Uses	
Provide for appropriate, sustainable visitor uses of the park and at the same time protect resources	The proposed trail would encourage park use, while the proposed fencing and revegetation would preserve natural 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 Proposed Project would improve existing trails, as well as provide new trails to close existing gaps.
Provide appropriate education and interpretation	Trail improvements would include an interpretive node on Segment C and a trailhead on Segment I of the Park to Playa Trail.
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 park administration and maintenance would not change with the Project.
Provide appropriate neighborhood buffers	Existing walls and fences, elevation differences, and intervening trees 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 various park and open space operators, as it does under existing

**TABLE 4-12
CONSISTENCY WITH KHSRA GENERAL PLAN AMENDMENT**

Goal*	Project Consistency
	conditions.
Use principles of sustainability in the design and implementation of all park facilities	Native, drought-tolerant plants would be used for revegetation, and the drainage channel in the KHSRA would be reconstructed as a vegetated swale. Trails would have natural surfaces or would be paved with decomposed granite. A paved trail would be provided in areas replacing an existing paved pathway. Turf irrigation would be replaced with drip irrigation at three locations.
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 along Segment C.
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.	

The Proposed Project would not conflict with regional plans, policies, or regulations related to land use and planning, including the Regional Comprehensive Plan (RCP), the Regional Housing Needs Assessment (RHNA), and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by the Southern California Association of Governments (SCAG), or other regional plans since the Proposed Project 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.

While some changes in land uses would occur, potential land use impacts would be less than significant.

c) No Impact

As discussed in Section 4.4, Biological Resources, the Baldwin Hills area is not located in the boundaries of a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). No County-designated Significant Ecological Area is located on or near the Baldwin Hills or the proposed trail alignment. Therefore, no impact related to an HCP or NCCP would occur.

4.11.2 MITIGATION PROGRAM

Regulatory Requirements

None.

Mitigation Measures

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

4.12 <u>MINERAL RESOURCES</u>	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.12.1 ENVIRONMENTAL SETTING

Oil Resources

The Inglewood oilfield underlies the west-central and south-central portions of the Baldwin Hills, covering approximately 950 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 production facilities. In 2000, only 430 wells remained active, with 215 inactive wells and 530 abandoned wells (CDPR 2002b). Oil production in 2011 was estimated at over 2.8 million barrels, along with 1.45 million cubic feet of gas and 126.8 million barrels of brine water (DOGGR 2012).

While there are numerous oil wells south of the Park to Playa Trail alignment, no trail improvements are proposed on or near active oil wells. However, there are plugged oil wells in the parks and open space areas and undeveloped land where the trail alignment is proposed.

Aggregate Resources

There are no regionally significant aggregate resources (i.e., sand and gravel resources) in the Baldwin Hills area, as identified by the California Department of Conservation (CDMG 1987). There are no ongoing mining activities in or near the proposed trail alignment.

4.12.2 IMPACT ANALYSIS

a) No Impact

The Park to Playa Trail alignment would not go through areas that are subject to ongoing oil and gas drilling and production activities. Fences separate the oil wells from the public parks, open space areas, and undeveloped land where the proposed trail improvements would occur. The Blair Hills Corridor (Segment C) was previously used for oil drilling operations but is no longer in active use. The dirt roads in this area would remain in place to allow future oil drilling 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 and maintain future access to the wells.

In addition to the existing fence (sections of which will be relocated), new fences are proposed in the Blair Hills Corridor (Segment C) to further separate the proposed trail from adjacent oil

drilling operations. Also, existing access and dirt roads would be retained and no large impervious surfaces are proposed as part of the Project that could limit access to underlying oil and gas resources. The Proposed Project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. No impact would occur.

b) No Impact

No regionally significant aggregate resources have been identified on or near the existing trails or the proposed trail alignment. Construction of the proposed trail improvements would utilize relatively small quantities of aggregate materials (i.e., decomposed granite, sand, and gravel) and metals. The limited size of the proposed improvements would not result in any measurable loss in the availability of regional or locally important mineral resources. No impact would occur.

4.12.3 MITIGATION PROGRAM

Regulatory Requirements

None.

Mitigation Measures

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

4.13 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.13.1 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.

The sensitive receptors near the Park to Playa Trail include residences located adjacent to the various trail segments; recreation areas located adjacent to and in the KHSRA; and the Windsor Hills Elementary School. These receptors are described in Section 2.3 of this IS/MND and are shown on Exhibits 2-4 through 2-12.

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 La Brea Avenue and from aircraft overflights from LAX. On the eastern portion of the trail, the primary noise source is vehicle traffic on Stocker Street and other roads in the vicinity. Ambient noise levels were measured near the trail segments and nearby residences on October 23, 2012, between 10:00 AM and 11:30 AM, as described in Table 4-13. The measurement locations are shown on Exhibits 2-6, 2-9, and 2-12. Average noise levels (L_{eq}) on the trail alignment varied from 45 to 61 A-weighted decibels (dBA).

**TABLE 4-13
NOISE MEASUREMENT DATA**

Site	Location	Time	L _{eq} (dBA)	L _{min} (dBA)	L _{max} (dBA)	Notes
1	Segment C (Blair Hills Corridor) at the edge of the trail south of Stoneview St and east of the abandoned school.	11:34AM–11:52 AM	52	37	70	Noise from adjacent apartment complex. L _{max} from a motorcycle on La Cienega Blvd
2	Segment F (Janice's Green Valley Loop Trail) at the edge of the trail west of Punta Alta Dr and Padilla Pl.	12:29PM–12:49 PM	45	40	56	Background noise from distant traffic and residential areas
3	Segment F (Janice's Green Valley Loop Trail) at the edge of the trail east of Cloverdale Ave.	12:54 PM–1:14 PM	48	37	62	Background noise and some residential construction noise
4	Segment I (Stocker Corridor Trail) at the edge of the trail approximately 175 feet south of Stocker St.	2:08PM–2:28 PM	61	44	70	Traffic noise from Stocker St. L _{max} from traffic and an airplane overflight
L _{eq} : average noise level; L _{min} : minimum noise level; L _{max} : maximum noise level. All measurements made on October 23, 2012. Noise measurement data are provided in Appendix D.						

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...
- (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 dBA.

City of Culver City

Section 9.07.035 of the Culver City Municipal Code states that all construction activity 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 4-14.

**TABLE 4-14
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.			

4.13.2 IMPACT ANALYSIS

a, d) Less Than Significant Impact

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 dBA¹³ 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, and paving. 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 and the Windsor Hills Elementary School. The closest sensitive noise receptors to the proposed trail improvements are 75 to 100 feet from locations where equipment would be operated. Examples include, but are not limited to, residences on Tompkins Way (Segment B); Wright Terrace and Stoneview

¹³ L_{max} means the maximum A-frequency-weighted sound level (decibels) during a stated time period.

Drive (Segment C); Punta Alta Drive (Segment F); Cloverdale Avenue (Segment G); and Mount Vernon Drive (Segment I). The maximum noise level at 75 feet from a front end loader would be 75 dBA. At any receptor, the maximum noise levels from construction equipment would occur rarely because the equipment would be at the closest point for only short periods and would emit the loudest noise only when at full power. Noise levels at sensitive receptors are not anticipated to exceed the County noise ordinance limit of 75 dBA L_{max} 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 combines the time restrictions of the three jurisdictions to the most restrictive limits. Therefore, 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. Impacts would be less than significant.

Although noise impacts would be less than significant, 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.

b) No Impact

Groundborne vibration generated by construction projects is usually highest during pile driving and rock blasting. There would be no pile driving or rock blasting needed for construction of the Project. 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 Proposed 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 impact.

c) Less than Significant Impact

The Park to Playa Trail would continue to generate limited vehicle traffic from maintenance visits, as it occurs under existing conditions. There would be no measurable increase in ambient noise levels due to these intermittent mobile sources. As existing, noise would be generated by park and trail users, and the primary noise would be the voices of these users. There would potentially be more users than at present, and some new or modified trails would be closer to residences. Users will be on any one segment of the trail for short periods of time and on an irregular basis. Audible noises from these users would also be infrequent. Thus, the potential increase in the frequency of hearing voices from the Park to Playa Trail 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 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 airports to the Baldwin Hills area are the Santa Monica Municipal Airport, approximately 3.5 miles to the west, and LAX, approximately 4.0 miles to the southwest. The Airport Influence Areas for these airports do not include the trail alignment or nearby areas (ALUC 2003a and 2003b). The Proposed Project would not include the development of noise-sensitive uses. While aircraft overflights would continue to be audible along the trail alignment, users of the Park to Playa Trail would not be exposed to excessive aircraft noise levels. No impact would occur.

4.13.3 MITIGATION PROGRAM

Regulatory Requirements

RR 4.12-1 Project construction shall comply with the most restrictive time limits 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 BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation during construction activities.

Mitigation Measures

MM 4.12-1 Prior to the start 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, picnic areas, and the Windsor Hills Elementary School as feasible. Where stationary equipment must be located within 250 feet of a residence or school, 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 and the Windsor Hills Elementary School as feasible.

The BHRCA shall include this MM as a note in the Contractor Specifications, and the Contractor shall implement this MM during construction activities, subject to inspection by the BHRCA.

4.14 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.14.1 ENVIRONMENTAL SETTING

Nearby Residences

There are no dwelling units or permanent residents along the proposed trail alignment. The proposed Park to Playa Trail would pass through the Baldwin Hills area in existing public parks, open space areas, and undeveloped land that is adjacent to existing residences along Don Tomaso Drive, Mount Vernon Drive, Enoro Drive, Kenway Avenue, Cloverdale Avenue, Glenford Street, Stoneview Drive, Wright Terrace, and Wrightcrest Drive.

Trail Users

Existing trail users include area 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)¹⁴ (Alta 2011).

4.14.2 IMPACT ANALYSIS

a) No Impact

The Proposed Project would not involve housing or business development and, thus, would not lead to the introduction of permanent residents or employees into the Baldwin Hills area or along the trail. Also, no extension of utility lines or roadways to unserved areas is proposed as part of the Project. The proposed trail improvements could make the surrounding area more attractive to some homebuyers and renters, but is not expected to be the major factor in the selection of home purchases or household location. Therefore, no direct or indirect population growth would occur with the proposed trail project.

Area residents are expected to continue to utilize the existing and proposed trails for walking, hiking, jogging, biking, dog walking, and other recreational uses and persons from farther locations would also continue to come to the Baldwin Hills to use the trail and recreational facilities in the area. An increase in the number of persons using the trail could be expected

¹⁴ Percentage does not total 100% since some of the 170 survey respondents provided more than 1 response.

over time with the Project and the proposed improvements, but this use would still be confined to a few hours during the daytime as they utilize the Park to Playa Trail and other nearby recreational amenities. No permanent resident population would be created by the Project.

Construction activities would lead to a temporary increase in the daytime population, but 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 the new trails and trail improvements would still be provided by current park owners/operators and would not generate new demand for local goods or services that may induce growth in the area. No impacts 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 would not be displaced or demolished 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.

4.14.3 MITIGATION PROGRAM

Regulatory Requirements

None.

Mitigation Measures

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

4.15 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.15.1 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 Los Angeles County Fire Station is Station 172, located at 810 Centinela Avenue in Inglewood, approximately 2.6 miles south of the KHSRA. The nearest Los Angeles City Fire Station is Station 94, located at 4470 Coliseum Street, approximately 0.85 mile northeast of the KHSRA. The main station for the Culver City Fire Department is located at 9770 Culver Boulevard, approximately 0.6 mile west of Culver City Park.

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 nearest Los Angeles County Sheriff's Station is the Marina del Rey Station, located at 13851 Fiji Way, approximately 4.6 miles southwest of Culver City Park. The LAPD's Southwest Community Police Station is located at 1546 West Martin Luther King Jr. Boulevard, approximately 2.1 miles east of the Stocker Corridor. The LAPD also has a substation at the Baldwin Hills-Crenshaw Plaza at 3650 West Martin Luther King Boulevard, approximately 1.2 miles east of the KHSRA. The Culver City Police Department is located at 4040 Duquesne Avenue, approximately 0.5 mile west of Culver City Park.

The KHSRA and Stocker Corridor are subject to patrol by the County Sheriff's Department, with security at the Baldwin Hills Scenic Overlook provided by State Rangers. The Culver City Park and the Blair Hills Corridor are patrolled by the Culver City Police Department.

School Services

The areas east of La Cienega Boulevard are located within the service boundaries of the Los Angeles Unified School District (LAUSD), and areas to the west are served by the Culver City Unified School District. LAUSD's Windsor Elementary School is located southeast of the KHSRA on Overhill Drive, just south of the western end of the Stocker Street Corridor (Segment I).

Libraries

The nearest County libraries to the proposed trail alignment are the Culver City Julian Dixon Library at 4975 Overland Avenue in Culver City, 0.72 mile southwest of Culver City Park (Segment A), and the View Park Library at 3854 54th Street, 0.95 mile southeast of the Stocker Street Corridor (Segment I).

The nearest Los Angeles City libraries to the proposed trail alignment are the Baldwin Hills Library at 2906 La Brea Avenue, approximately 1.0 mile north of the KHSRA and the Angeles Mesa Library at 2700 West 52nd Street, 1.3 miles southeast of the Stocker Street Corridor (Segment I).

The parks and open space areas (where the proposed trail alignment would pass through) are not occupied by a permanent population and do not generate a demand for schools, parks, or libraries.

4.15.2 IMPACT ANALYSIS

a)(i) 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 the proposed trail alignment. The proposed trail improvements would not be built with or utilize flammable, combustible, or explosive materials. Therefore, no demand for fire protection services would be generated by the trail improvements. However, short-term construction activities, increased use of the trail in the long term, and periodic maintenance activities could increase the risk for brush fires and generate additional 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.

Since the majority of the segments of the Park to Playa Trail are existing trails and no new land use is proposed, no new or physically altered fire protection facilities would be required to provide fire protection services to users of the proposed trail and 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 the proposed trail alignment. While trail users would only be using the trails for 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 increase in the number of trail users over time. The demand for police services that would be generated by the presence of trail improvements and the increase in trail users would depend on the presence of and/or attraction of the trail to criminal elements.

The County Sheriff's Department would continue to provide police protection services to the trail, and will be responsible for the enforcement of 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). These areas would include the Blair Hills Corridor, the KHSRA, and Stocker Street Corridor (Segments C through I). The Culver City Police Department is responsible for monitoring and enforcing the Culver City regulations on the use of city parks, such as Segment A (Culver City Park) (RR 4.14-2). In addition, there are regulations related to permitted activities in State parks that are enforced by the State Rangers at Segment B (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 apply. Compliance with State, County, and the Culver City regulations by trail users and law enforcement by the State Rangers, County Sheriff's Department, and Culver City Police Department would reduce the incidence of crime along the Park to Playa Trail and its associated impacts on police protection services.

Since the majority of the segments of the Park to Playa Trail are existing trails and no new land use is proposed, 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 Park to Playa Trail and the proposed trail improvements would not lead to an increase in the resident population or housing stock in the area. Therefore, no demand for schools, libraries, parks, or other public facilities would be generated by the Proposed Project. The Project is also not expected to have any direct impacts on school services at the Windsor Hills Elementary School (located south of the western end of the Stocker Corridor Trail). The proposed trail improvements would promote greater use of the trail by area residents, students, and others in the surrounding communities and in the region, but would not create a demand for maintenance activities that would require new or expanded public facilities since the majority of the trail alignment is along existing trails and there are existing maintenance programs, crews, and facilities for these trails. There would be no adverse impact.

4.15.3 MITIGATION PROGRAM

Regulatory Requirements

RR 4.14-1 Users of the Park to Playa Trail that are located in the KHSRA, Stocker Corridor, and Blair Hills Corridor would need to 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 BHRCA shall include these signs in the project plans and shall be constructed/installed by the Contractor. The County Sheriff's Department shall be responsible for monitoring and enforcing these regulations on Segments C to I of the Park to Playa Trail.

- RR 4.14-2** Users of the Culver City Park are subject to Chapter 9.10 of the Culver City Municipal Code, which regulates tree planting; permitted activities in the parks; hours of operation; and other prohibitions.

The Culver City Police Department shall be responsible for monitoring and enforcing these regulations along Segment A (Culver City Park).

- RR 4.14-3** Title 14, Division 3 of the *California Code of Regulations* 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 State Ranger shall be responsible for monitoring and enforcing these regulations along Segment B (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 BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with this regulation during construction and maintenance activities along the Park to Playa Trail.

- 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 the Park to Playa Trail, which outline prohibitions on open burning, smoking, flaming or glowing objects, and open flames.

The BHRCA shall include this RR in the Engineering Plans and in the Contractor Specifications. The Engineer shall include the required signs in the Project plans; the contractor shall install the required signs; and the Contractor comply with these regulations during construction and maintenance activities along the Park to Playa Trail.

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.

4.16 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.16.1 ENVIRONMENTAL SETTING

Existing Recreational Facilities

The Culver City Park (Segment A) has three softball diamonds, a baseball field, a skate park, a picnic area, a dog park, basketball courts, a playground, a boardwalk, and trails. The Baldwin Hills Scenic Overlook (Segment B) has a trailhead, a stairway to the top of the hill, a visitor center, several trails, a picnic area, an observation deck, and a parking area. A trail connects the Baldwin Hills Scenic Overlook to Culver City Park.

The KHSRA is developed with four playgrounds, two lighted baseball diamonds, sand volleyball court, half basketball court, fishing lake, waterfall, Japanese Garden, Olympic Forest, open fields, meeting room, picnic shelters, barbecue pits, shade structures, playground, 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 would be in the KHSRA.

Aside from these three main parks/recreational facilities, there are several other parks and recreational facilities in the project area that offer a wide range of recreational opportunities. At the western end of the proposed Park to Playa Trail is the Ballona Creek Bike Path, which 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 Blair Hills Park, located north of the Blair Hills Corridor (Segment C), is developed with a picnic area, a playground, a softball diamond, a basketball court, and an open field.

The Stocker Corridor Trail (Segment I) is a trail within 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 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 Houston Park is a City of Los Angeles park developed with a loop trail, open fields, basketball courts, a playground, and outdoor fitness equipment. It is located east of the KHSRA and north of the Stocker Corridor Trail.

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 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).

4.16.2 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 Baldwin Hills area and meet the demand of more individuals for improved trail facilities in the area.

With the Project, trail users are expected to utilize the Park to Playa Trail for greater distances (due to improved connections between trail segments and enhanced trail use experience), as well as 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 proposed 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 due to the Project's proposed connection to this bike path.

With the Proposed Project, the number of weekend and weekday trail users is expected to increase over time, although estimates have not been made and are difficult to develop because hiking, biking, walking, and trail use 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, skate boarding, or as a secondary activity of park visitors).

The increase in trail use brought on by the Proposed Project may also increase the use of other recreational facilities at Culver City Park, Baldwin Hills Scenic Overlook, and the KHSRA, 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 segments of the Park to Playa Trail as an incidental activity to their use of the park facilities or that trail users would use the adjacent recreational facilities at the start of their trail use or to 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

The Project would designate existing trails as the proposed Park to Playa Trail, as well as develop new trail segments in public parks and open spaces and undeveloped land in the Baldwin Hills area. An increase in the actual land area designated as parks or open space would occur with the Blair Hills Corridor Trail (Segment C), although this area has been publicly owned for several years. In other areas, existing trails and trail amenities in the parks and open space areas would be improved.

During construction of the trail improvements, sections of the existing trails would not be available for public use. During this time, other segments and alternative pedestrian paths or sidewalks would remain available for use. Trail obstructions would be temporary and would only constrain trail use along finite segments of the trail during short-term construction on each segment. This is not considered a significant impact to recreation.

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; the KHSRA General Plan Amendment; and the various bicycle master plans. The additional and improved recreational amenities and opportunities for residents of the surrounding communities and the region that would be brought on by 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.

4.16.3 MITIGATION PROGRAM

Regulatory Requirements

None.

Mitigation Measures

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

4.17 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

4.17.1 ENVIRONMENTAL SETTING

Roadway Network

Regional access to the Baldwin Hills 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 1.15 miles north of the KHSRA. It carried approximately 17,900 vehicles during the peak hours and 271,000 vehicles per day in 2011 between La Brea Avenue and Venice Boulevard (Caltrans 2012). Near Baldwin Hills, ramps to the I-10 are located on Washington Boulevard, La Cienega Boulevard, La Brea Avenue, and Crenshaw 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 Baldwin 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 32,800 vehicles per day in 2004 (Culver City 2011a).

- Rodeo Road is a four- to six-lane east-west arterial that intersects with Jefferson Boulevard, La Cienega Boulevard, and La Brea Avenue to the north of the Baldwin Hills. It is located in the City of Los Angeles. In 2010, Rodeo Road carried approximately 2,427 to 2,719 vehicles during the morning (AM) peak hour and 2,307 to 2,478 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. 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).

In 2010, La Cienega Boulevard carried approximately 4,850 to 6,756 vehicles during the AM peak hour and 4,843 to 6,598 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)¹⁵ F during both the AM and PM peak hours in 2010 (SCAG 2010).

- La Brea Avenue is a four-lane collector running north-south through the eastern section of the Baldwin Hills. An access road runs in a westerly direction from this road into a communication tower facility at the KHSRA. Along the KHSRA, La Brea Avenue serves as the boundary between the City of Los Angeles (to the east) and an unincorporated area of the County of Los Angeles (to the west). In 2012, peak hour traffic was estimated at approximately 5,399 vehicles per hour, and daily traffic was 58,957 vehicles on La Brea Avenue north of Stocker Street (County of Los Angeles 2012d).
- 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 2,351 vehicles during the AM peak hour and 2,256 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). In 2011, peak hour traffic was approximately 2,102 vehicles per hour; daily traffic was 27,634 vehicles on Stocker Street east of La Cienega Boulevard and 19,589 vehicles per day east of Valley Ridge Avenue (County of Los Angeles 2012d).

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;

¹⁵ 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.

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 through the Baldwin Hills. Other nearby CMP highways/freeways include State Route (SR) 90, I-10, I-405, and Manchester Boulevard (Metro 2010).

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 2012). These stations are located 0.6 and 0.9 mile from the northern end of the KHSRA, respectively.

Culver CityBus and Metro buses serve the project area with Metro Bus Routes 212 and 312 running on La Brea Avenue and Overhill Drive; Route 217 along La Cienega Boulevard; Route 120 on Stocker Street; CityBus 4 on Jefferson Boulevard; and CityBus 5 on Rodeo Road and La Cienega Boulevard (Metro 2012; Culver City 2012a).

Bikeways

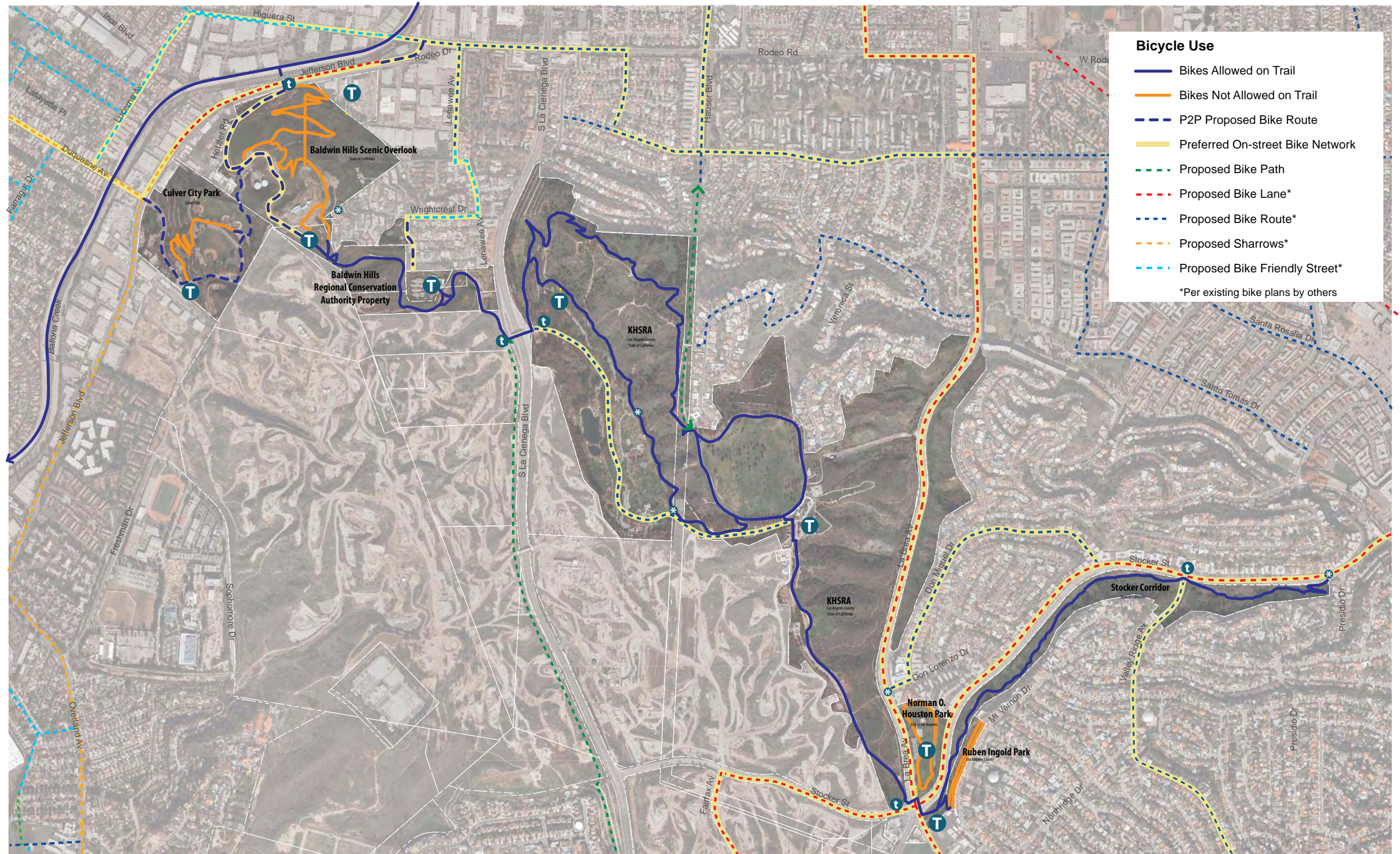
The City of Los Angeles 2010 Bicycle Plan shows a designated Bicycle Lane on La Brea Avenue from Stocker Street, north until Rodeo Road, where it turns west and then north on Redondo Boulevard. The Plan also designates the following as Bicycle Friendly Streets:

- Don Lorenzo Drive east from La Brea Avenue and then north along Don Miguel Drive and looping east and southeast to Stocker Street.
- Rodeo Road east from Ballona Creek until Hauser Boulevard, then south to Coliseum Street and east on Coliseum Street to Chesapeake Avenue.
- Access road behind homes on Cloverdale Avenue north to Exposition Boulevard.
- Access road behind homes on Cloverdale Avenue, east to Cloverdale Avenue and then north and northeast on Cloverdale Avenue to Sanchez Drive and then east on Veronica Street to La Brea Avenue.

The County of Los Angeles Bicycle Master Plan shows proposed Class II Bike Lanes and Class III Bike Routes in the Baldwin Hills area between La Cienega Boulevard and Crenshaw Boulevard. This includes proposed Bike Lanes on Stocker Street, Angeles Vista Boulevard, Fairfax Avenue, and Overhill Drive and proposed Bike Routes on Slauson Avenue and Valley Ridge Avenue (County of Los Angeles 2012a).

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 a shared roadway bicycle marking on Jefferson Boulevard along and south of Culver City Park (Segment A); a bike lane on Duquesne Avenue and on Jefferson Boulevard north of Culver City Park; and a bicycle-friendly street on Wrightcrest Drive (from Blair Hills Park) and Lenawee Avenue. The Master Plan also proposes a pedestrian corridor on Jefferson Boulevard and Duquesne Avenue (Culver City 2010).

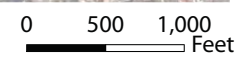
Exhibit 4-18 shows the bicycle network in the project area.



Bicycle Use

- Bikes Allowed on Trail
- Bikes Not Allowed on Trail
- - - P2P Proposed Bike Route
- Preferred On-street Bike Network
- - - Proposed Bike Path
- - - Proposed Bike Lane*
- - - Proposed Bike Route*
- - - Proposed Sharrows*
- - - Proposed Bike Friendly Street*

*Per existing bike plans by others



Source: Alta Planning + Design 2012

Bicycle Network

Park to Playa Trail

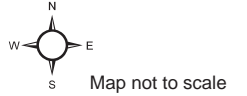


Exhibit 4-18



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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).

4.17.2 IMPACT ANALYSIS

a) Less Than Significant Impact

Construction Traffic

The Proposed Project would generate short-term vehicle trips to and from each trail segment as 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. Construction of the Proposed Project would also require the export of approximately 1,347 cubic yards (cy) of soil and the associated truck trips. Assuming the use of 20-cy trucks, this soil import would involve approximately 68 round-trip truck trips over the course of approximately 2 weeks. 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 and proposed construction phasing into two 5-month periods (June–October 2013 and June–October 2014), construction-related daily trips associated with worker commutes, equipment and materials transport, and haul truck trips would be relatively low.

Construction of the Project would encroach into public rights-of-way at the Five Points intersection (the intersection of La Brea Avenue, Stocker Street, and Overhill Drive) and at the access bridge over La Cienega Boulevard, on Jefferson Boulevard, and on Duquesne Avenue. The partial closure of some of these streets would add to existing traffic congestion, but this impact would be temporary. Also, construction would not result in a lack of access to adjacent developments since 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 SC 4.16-1, would reduce construction traffic impacts.

Construction would occur by segment and therefore, would be affecting different roadways each time; and traffic obstructions would be short-term and scattered. Construction time limits would reduce conflicts with regular traffic on roadways and freeways that would be utilized by equipment coming to and from the construction sites and from partial street closures. Impacts on existing traffic and congestion levels would be minimized. Vehicle trips during construction would also be temporary and short-term. Construction traffic impacts would be considered less than significant.

Operational Traffic

The majority of Park to Playa Trail users would be driving to and from the proposed trail as they do now. Implementation of the Proposed 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 the Park to Playa Trail would 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 Park to Playa Trail is not anticipated to become a major factor in the increase in the number 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, these trips would not be concentrated on any one street but would be scattered among all the different streets that provide access to the trail (including 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).

Also, maintenance activities for trail segments and trail improvements in existing parks and open space areas are expected to be provided by current park owners/operators. The maintenance of the new trail in Segment C 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 make longer internal trips and new trips to Segment C (Blair Hills Corridor Trail). The maintenance and inspection trips to Segment C would be no more than once a day and likely during non-peak hours. Ongoing maintenance trips at Culver City Park (Segment A); Baldwin Hills Scenic Overlook (Segment C); and Stocker Corridor Trail (Segment I) would remain as they are in the existing condition.

Therefore, Project-generated vehicle trips would represent a small percentage of existing traffic volumes in the project area that would not occur during peak hours and would not result in substantial traffic congestion. Also, impacts on La Cienega Boulevard or other CMP-designated highway would be limited since there are several locations where the Park to Playa Trail may be accessed (i.e., Duquesne Avenue, Culver City Park, Baldwin Hills Scenic Overlook, KHSRA, Stock Street, Valley Ridge Avenue, Presidio Drive, Ruben Ingold Park, and Norman Houston Park). In addition, maintenance activities at the Blair Hills Corridor Trail (Segment C) would be confined to maintenance vehicles exiting the KHSRA at La Cienega Boulevard and heading north to Rodeo Road, turning back on La Cienega Boulevard south to the access road at Segment C (Blair Hills Corridor Trail). From Segment C, maintenance vehicles would head south to the bridge over La Cienega Boulevard and then east into the KHSRA.

The proposed trailhead with a parking area at the southeast corner of Overhill Drive and Stocker Street will provide parking for trail users, which would relieve parking pressure on neighborhood streets around the adjacent Ruben Ingold Park. Therefore, reduced traffic on Mount Vernon Drive and other residential streets would occur in the Windsor Hills and View Park neighborhoods.

Traffic increases due to the increase in trail users coming to and from the proposed Park to Playa 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, which runs north-south through the Baldwin Hills. The proposed trail alignment would not be located along or cross La Cienega Boulevard. Rather, it includes a dedicated bike path/pedestrian walkway on the sidewalk of the existing KHSRA access bridge over 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 the Park to Playa Trail 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 come to the Park to Playa Trail outside weekday peak hours. Therefore, the Proposed 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 Baldwin Hills are not located within the boundaries of an airport land use plan or within 2.0 miles of an airport. The nearest airports (the Santa Monica Municipal Airport and LAX) are located 3.5 to 4.0 miles from the trail alignment. The proposed trail improvements would not generate air traffic or require air transportation. Therefore, the Proposed Project would not change air traffic levels at the Santa Monica Municipal Airport or LAX, and it would not create safety risks or obstructions to air navigation. No impact would occur.

d) Less than Significant Impact

The Proposed Project would encourage use of trails in the Baldwin Hills area through trail improvements and signage. Some segments of existing trails would be realigned and relocated to improve accessibility in compliance with ADA standards and the County's Trail Manual. Therefore, no public safety hazards would be created by any of the Project's design features.

However, increased use of the trails would lead to a larger number of individuals crossing area roadways (i.e., Valley Ridge Avenue and the Five Points intersection); using roadway sidewalks (i.e., Hetzler Road, Duquesne Avenue, and the overhead bridge across La Cienega Boulevard); and using the shoulders of internal access roads at the KHSRA, Baldwin Hills Scenic Overlook [Segment B], and Culver City Park [Segment A]). 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 throughout the proposed trail alignment to promote safety for trail users. Therefore, a substantial increase in traffic hazards would not be created by the Project. Impacts would be less than significant.

e) Less than Significant Impact

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). La Cienega Boulevard and La Brea Avenue are also identified as Selected Disaster Routes in the County's General Plan Safety Element (County of Los Angeles 1990).

The proposed Park to Playa Trail would generally not be located on public roadways, except for connections and crosswalks at the Five Points Intersection, La Cienega Boulevard, Jefferson Boulevard, and the segment of Duquesne Avenue (from Culver City Park [Segment A] to the Ballona Creek Bike Path). Trail use of these segments is not expected to affect emergency evacuation due to the small number of trail users at any one time at these road crossings and on the sidewalks of these roads. Trail use would also not affect emergency response to the project area since sirens would warn the public of emergency vehicles and trail users could readily move out of the roadway crossings.

The proposed trails located adjacent to public roadways could serve as minor evacuation routes during emergencies. Therefore, they would not adversely affect emergency response and evacuation.

Construction on or near public roadways could lead to the temporary and partial closure of travel lanes along the trail alignment. The Proposed Project would implement RRs 4.16-1 and 4.16-2, as discussed above, to provide appropriate traffic control devices during construction and maintain traffic flows and access to individual developments. Also, required notification of emergency personnel would allow the use of alternative routes to emergencies or for evacuation. Therefore, impacts to emergency access would be less than significant.

f) No Impact

As discussed above, the Project would not conflict with the CMP. Also, the Project would complement the City of Los Angeles 2010 Bicycle Plan, the County of Los Angeles Bicycle Master Plan, and the Culver City Bicycle and Pedestrian Master Plan since it would continue to allow bicycle use on the proposed Park to Playa Trail and help promote bicycle use.

The increase in public transit users due to the increase in the number of trail users is not expected to be significant and would not occur during the peak hours since only three percent of trail users utilize public transportation systems. Also, the Proposed Project is intended to benefit pedestrians, hikers, walkers, joggers, bicyclists and other 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.

4.17.3 MITIGATION PROGRAM

Regulatory Requirements

RR 4.16-1 In accordance with the Cities of Los Angeles and Culver City and the County's 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 BHRCA shall include this RR as a note in the Contractor Specifications. 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 BHRCA shall include this RR as a note in the Engineering Plans and in the Contractor Specifications. The Engineer shall design and the Contractor shall construct all improvements on public roadways in accordance with the MUTCD.

Mitigation Measures

With compliance with existing regulations, the Proposed Project would result in less than significant impacts related to transportation or traffic; therefore, no mitigation is required.

4.18 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.18.1 ENVIRONMENTAL SETTING

Water Service

Water service in the project area is provided by the City of Los Angeles Department of Water and Power (LADWP), which serves the KHSRA; the California American Water Company, which serves the Windsor Hills area; and the Golden State Water Company (a subsidiary of American States Water Company), which serves the City of Culver City and the Baldwin Hills Scenic Overlook (Segment B). The LADWP provided 168 billion gallons of water to their customers during the 2010–2011 fiscal year (LADWP 2012). The Golden State Water Company (GSWC) provided 1.77 billion gallons (5,454 acre-feet) of water to its Culver City service area in 2010 (GSWC 2011). The California American Water Company provided 1.1 billion gallons (3,489 acre-feet) of water to its Baldwin Hills Water System (covering the communities of Ladera Heights, Windsor Hills, View Park, and unincorporated County areas) in 2011 (California American Water 2012a).

Sewer Service

Sewer service in the project area is provided by the Los Angeles County Sanitation District No. 5 (which serves the Stocker Street Corridor) and 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 County Sanitation District No. 5 service area is conveyed and treated at the Joint Water Pollution Control Plant located at 24501 South Figueroa Street in Carson, approximately 14.0 miles south of Baldwin Hills. This plant has a design capacity of 400 million gallons per day (mgd), and treated 275 mgd in 2011 (LACSD 2012a).

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, 6.0 miles southwest of the KHSRA. The capacity of the Hyperion Treatment Plant is 450 mgd, with an average wastewater flow of 350 mgd (City of Los Angeles 2006). Main sewer pipelines (i.e., North Outfall Sewer, East Central Interceptor Sewer, Central Outfall Sewer, and North Outfall Replacement Sewer) extend from Jefferson Boulevard, La Cienega Boulevard, and Rodeo Road and pass through the Baldwin Hills Scenic Overlook (Segment B), Culver City Park (Segment A), Blair Hills Corridor (Segment C), and areas farther southwest toward the Hyperion Treatment Plant.

There are no recycled water lines near the Park to Playa Trail alignment. However, a future extension of a Tier 2 (long-term) recycled water pipeline is planned from an existing pipeline on Inglewood Avenue to the corner of La Brea Avenue and Stocker Street (City of Los Angeles 2006).

Storm Drainage

Storm water runoff along the proposed trail alignment generally flows into lower areas as sheet flow, toward swales; drainage ditches at various locations; and into area catch basins and underground storm drain lines on La Brea Avenue, La Cienega Boulevard, Lenawee Avenue, and Jefferson Boulevard. 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 Blair Hills Corridor (Segment C) and into the underground line on Lenawee Avenue, which connects to Ballona Creek to the northwest. Storm water in the surrounding area is conveyed into storm drain pipes for discharge into the Ballona Creek Channel or the Centinela Creek, which joins Ballona Creek southwest of the Baldwin Hills.

Solid Waste Disposal

Solid waste collection services in unincorporated County areas are provided by private haulers with solid waste disposal brought to area landfills. The Los Angeles County Sanitation District (LACSD) operates the Calabasas Landfill, Scholl Canyon Landfill and Puente Hills Landfill, with the nearest landfill to the Baldwin Hills area being the Puente Hills Landfill (located at 13130 Crossroads Parkway South in the City of Industry). This landfill is permitted to accept 13,200 tons per day and has a permitted capacity of 74 million cubic yards. In 2009, it had a remaining capacity of 35.2 million cubic yards (CalRecycle 2012a).

Solid waste collection services in the City of Culver City are provided by the City's Sanitation Division, with solid wastes brought to the Puente Hills Landfill; 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 2006, it had a remaining capacity of 29.3 million cubic yards (CalRecycle 2012b).

The 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 2012c). The energy produced is used to operate the facility and the remainder is sold to SCE (LACSD 2012b).

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 has a remaining capacity of 112.3 million cubic yards, as of July 2007. It is expected to remain in operation until the end of 2037 (CalRecycle 2012d).

4.18.2 IMPACT ANALYSIS

a, e) No Impact

The proposed trail improvements do not include new restroom facilities. No sewage generation would be generated by the Proposed Project. While trail users may use adjacent facilities at public parks in the area, the increase in sewage generation due to increased trail use is anticipated to be minimal. No impact on sewer line capacity; wastewater treatment requirements; or wastewater treatment facilities would occur with the Project. Therefore, no new wastewater treatment facilities are needed by the Project and no impact would occur.

b, d) Less than Significant Impact

The Proposed Project would need water for dust control and cleaning during the construction phase and for irrigation of revegetated areas in the long term. Water use for dust control and incidental cleaning during the construction phase would be limited and temporary. Water demand for plant irrigation would also represent a minor amount of water since most areas to be revegetated would be hydroseeded with native and drought-tolerant plants and equipped with drip irrigation systems.

With approximately 210,000 square feet of land to be revegetated with native plants and equipped with drip irrigation systems, long-term water demand for the Project is estimated at approximately 4.6 million gallons of water per year. Three of these areas (covering approximately 70,000 square feet) have existing irrigation systems that would be replaced with drip irrigation systems to reduce water demand. Also, this water demand from the Project would be served by three separate water companies serving the area. As a worst case, the total water demand would represent a minor amount (less than 0.003 percent) of the 168 billion gallons of water provided by the LADWP during the 2010–2011 fiscal year. It would also be a minor amount (less than 0.26 percent) of the 1.77 billion gallons (5,454 acre-feet) of water provided by the GWSC to its Culver City service area in 2010 or only 0.42 percent of the 1.1 billion gallons of water provided by the California American Water Company to its Baldwin Hills Water System in 2011. Since a portion of the estimated irrigation demand is existing and water supply would come from at least two different water companies, water service impacts would be even less.

No new water supplies or treatment facilities would be needed by the Project, and impacts would be less than significant.

c) No Impact

The Proposed Project would introduce impervious surfaces in the form of stairs; sign posts; fence posts; shade structure/bench foundations; retaining walls; and other paved areas for bike racks, kiosks, trash cans, and other associated improvements. However, these improvements would be surrounded by open pervious areas that would absorb storm water from these small, scattered impervious surfaces. No measurable increase in storm water runoff would occur with the Project, and no expansion of existing storm drain facilities is needed to serve the Proposed Project. The proposed drainage channel restoration at Segment E would increase ground

percolation of runoff and treat storm water in the KHSRA. The revegetation of the open drainage channel and the proposed trail in the retention basin in Segment C (Blair Hills Corridor) would not affect the drainage capacities of these facilities. Therefore, the Proposed Project would have no adverse impact on storm drain facilities.

f, g) Less than Significant Impact

Construction of the proposed trail improvements would generate solid wastes requiring disposal at area landfills. With no building construction, the construction wastes that would be generated by the proposed trail improvements would be limited to vegetation debris from site clearing; approximately 1,347 cubic yards of soil export from excavation and grading; construction wastes from signs, kiosks, interpretive node, and shade structures; and excess building materials. This one-time waste generation would be temporary and would not deplete available capacities at existing landfills.

The County of Los Angeles 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 City of Los Angeles requires vegetation and soils from land clearing activities to be reused or recycled. In addition, C&D wastes in the City have to be brought to a certified waste recycling processor for sorting and recycling. However, the County manages the KHSRA (which is largely in the County but partially located in the City of Los Angeles) so County regulations would apply.

To reduce solid waste disposal needs, construction contractors would have to recycle at least 50 percent of construction debris in accordance with County regulations (RR 4.17-1). With this recycling, 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, the Puente Hills Landfill, and/or the Chiquita Canyon Landfill to dispose of the construction wastes from the Project.

Since wastes generated during construction of the Proposed Project would be handled and disposed of in compliance with all applicable federal, State, and local statutes and regulations, including the County's Construction Waste Ordinance (RR 4.17-1), impacts on landfill capacity would be limited and temporary and are considered less than significant. No conflict with solid waste regulations would occur.

Long term-waste generation would be limited to organic wastes from landscape maintenance from revegetated areas and from trash cans provided at the proposed trailhead in Segment I. This would not result in any significant waste generation that would require additional landfill capacity. Impacts would be less than significant.

4.18.3 MITIGATION PROGRAM

Regulatory Requirements

RR 4.17-1 As stated in Chapter 20.87, Construction and Demolition Debris Recycling and Reuse, of the Los Angeles County Code, at least 50 percent of all construction and demolition debris, soil, rock, and gravel removed from a project site shall be recycled or reused unless a lower percentage is approved by the County of Los Angeles Director of Public Works. 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 BHRCA shall include this RR as a note in the Contractor Specifications, and the Contractor shall comply with this regulation during construction activities for the Park to Playa Trail.

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 BHRCA shall include this RR as a note in the Contractor Specifications. The Contractor shall comply with pertinent hazardous material regulations during construction and maintenance activities for the Park to Playa Trail.

Mitigation Measures

With compliance with existing regulations, the Proposed Project would not result in significant impacts related to utilities or service systems; therefore, no mitigation is required.

4.19 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.19.1 IMPACT ANALYSIS

a) Less than Significant with Mitigation

As discussed in Section 4.4, Biological Resources, the Proposed Project would have impacts on sensitive biological resources, including migratory birds and special status plant species, but mitigation has been provided to reduce these impacts to less than significant levels. The Project also involves restoration of disturbed areas and revegetation of several areas 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 Proposed 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 improvements to the Eastern Ridgeline Trail (which the County of Los Angeles Department of Public Works is undertaking independent of the Proposed Project)

and the State's sidewalk improvements along Hetzler Road and the realignment of the trail from the observation deck of the Baldwin Hills Scenic Overlook down to Hetzler Road to minimize slope erosion (which are under construction). In addition, the City of Culver City is planning to improve the sidewalk at the intersection of Jefferson Boulevard and Hetzler Road, through the installation of a new traffic signal, crosswalk, curb extensions, raised median islands, bike lanes, and parking lot improvements. The City of Los Angeles is also planning the improvement of Norman Houston Park, which may include the 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 the proposed Park to Playa Trail on a cumulative basis.

However, the impacts of the Proposed Project would be limited in both intensity and scope due to the relatively small size, scattered locations, and type of trail improvements proposed. Since project impacts would be less than significant after mitigation, impacts associated with the Proposed 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 Hazards and Hazardous Materials and Noise 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.

SECTION 5.0 REFERENCES

The following references were used in the preparation of this IS/MND and are available for review at the Los Angeles River Center and Gardens, 570 West Avenue 26, Suite 100, Los Angeles, California 90065 or at the offices of BonTerra Consulting at 225 South Lake Avenue, Suite 1000, Pasadena, California 91101 during normal business hours.

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