

CALIFORNIA COASTAL COMMISSION

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Filed: 11/27/01
 49th Day: 1/15/01
 180th Day: 5/26/01
 Staff: PE-LB
 Staff Report: 3/22/01
 Hearing Date: 4/10/01



**REGULAR CALENDAR AND DE NOVO HEARING ON APPEAL
 STAFF REPORT AND RECOMMENDATION**

APPLICATION NUMBER: 5-00-400 (Playa Capital); A-5-PLV-00-417 (Playa Capital)

APPLICANT: Playa Capital Company LLC

AGENTS: Catherine Tyrrell, Playa Capital
 Wayne Smith, Psomas Associates

PROJECT LOCATION: Culver Boulevard, and adjacent to and south of existing Lincoln/Culver ramp, Area C Playa Vista, Los Angeles County

PROJECT DESCRIPTION: Construct modified and new ramp connections between Lincoln and Culver Boulevards, widen the southerly half of Culver Boulevard between Lincoln Boulevard and the Marina Freeway to provide an additional eastbound lane, widen and improve grade level connections between Culver Boulevard and Marina Freeway, and install drainage, lighting and landscaping. The project will add 38 to 41 feet of pavement to the 34 to 37 foot wide road, and additional area to the connections to the Marina Freeway, where the finished road may be as much as 104 feet wide. The project will require 23,000 cubic yards cut and fill.

PROPOSED CHANGE IN DESCRIPTION DE NOVO: Construct 1.1 acre extended detention/biofiltration basin and restoration area within curve of ramp loop, to capture and treat storm water run off from the widened roads, through detention-induced settling and biofiltration before it drains to Ballona Creek; install additional landscaping along Culver Boulevard and along recently widened portions of Lincoln Boulevard rights-of-way.

SUMMARY OF STAFF RECOMMENDATION

Staff recommends that the Commission **APPROVE** the proposed development subject to conditions to:

- 1) Design, install, and maintain the proposed extended detention/biofiltration basin, consistent with specifications contained herein;
- 2) Install, as possible, willows, mule fat and other wetland facultative plants within the basin to achieve stated habitat goals;
- 3) Complete the assessment of the identified archaeological deposits as permitted in Coastal Development Permit No. 5-98-164 before undertaking any work authorized in the present permit.
- 4) Agree to maintain the bio-filtration basin along with other first phase improvements.

- 5) Construct sidewalk along the south side of Culver Boulevard within right-of-way.
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LOCAL APPROVAL: City of Los Angeles CDP 00-03B

EXECUTIVE SUMMARY

As described below, the proposed road improvement is a required mitigation measure for the first phase of a much larger project. The 280 acre first phase consists of two tracts located outside the Coastal Zone (See Table I, below). The City approved these tracts in 1995. Most of the first phase development is located outside the Coastal Zone, including all Phase I residential, commercial and office structures. Some road and drainage facilities to serve Playa Vista Phase I are located within the Coastal Zone. These include: (a) this proposed widening of Culver Boulevard, (b) the extension of Playa Vista Drive (Bay Street) from Jefferson to Culver Boulevard (application expected), (c) widening along Lincoln Boulevard (approved as 5-99-139), (d) the construction of 26.1 acre freshwater marsh restoration, 5-91-463(Maguire Thomas), and (e) other minor road widening and intersection improvements, including a changed intersection configuration at Culver and Jefferson within Area B. Development of the approved residential and commercial units outside the Coastal Zone cannot proceed without construction of this road-widening project. The standard of review for this road-widening project is whether or not it is consistent with Chapter 3 of the Coastal Act. The Commission cannot approve the road widening because it is a required mitigation measure for an approved project outside its jurisdiction, or deny the road widening based on its assessment of a project that is located outside the Coastal Zone.

The Playa Vista Project has long been controversial because of its size and intensity and because of the presence of wetlands. The Department of Fish and Game has identified 196.53 acres of wetlands on the Playa Vista property, including the 3.47 acres identified by the Corps in Area D. (Area D is located outside the Coastal Zone.) Because the historic wetland was much larger than the presently identified wetland, the extent of the wetlands is also subject to controversy. In 1984, the Department of Fish and Game identified 2.5 acres of wetland in Area C (the northwest quadrant of Playa Vista.) This road widening is proposed in the southwest corner of Area C and along the entire south side of Culver Boulevard, which bisects Area C.

Area C is owned by the State. The most immediate controversy in this case is whether the project is an appropriate use of State property. Until December 31, 2000, the applicant had an automatic right to purchase the area, and incorporated Area C into plans for the larger Playa Vista project. The State and Playa Vista agreed that Playa Vista had a right to purchase Area C for an agreed sum before December 31, 2000. After December 31 2000, the right became only an option. Playa Vista failed to purchase Area C by December 31, 2000.

Because the applicant no longer has an automatic right to purchase it, Area C is now under consideration for development as a public park. Although development as a park is still only a possibility, this report will address how doubling the width of the road and the addition of ramps connecting to Lincoln Boulevard and the Marina Freeway would impact the development or operation of a park. The Commission should also consider whether the widening of the road could impact habitat recovery efforts on the site.

Due to the presence of a small (2.5-acre) mapped wetland on the north side of Area C, the public has also raised issues whether the road and ramp building could impact that wetland and or other areas that are not mapped wetlands. The proposed project does not fill or drain into any of the mapped wetland areas on the project site. However, the proposed new ramp from northbound Lincoln to Culver Boulevard impacts a 0.19-acre area that is vegetated with a mixture of mulefat and introduced annuals, raising concerns with the wetland impacts of this project. Opponents have indicated that they believe that the Department of Fish and Game should have determined that this area is a wetland. Mulefat is a wetland facultative plant – it is found in wetlands and marshes but also in other areas subject to occasional flooding. In response to this concern, the Commission's staff biologist visited the area of mulefat located within the ramp footprint and determined that that area is not wetland although it may have some habitat value.

Opponents have also raised concerns that runoff from the road widening will adversely impact Ballona Creek or the drainage course found north of Culver Boulevard (mapped as the Marina Drain on flood control maps). The new road area will not drain to the Marina Drain or the patch of Salicornia that constitute the mapped wetlands found on the site. In response to concerns that the increased runoff will carry additional polluted waters into Ballona Creek, the applicant is proposing an extended detention/biofiltration basin to filter runoff from the road, which will then discharge to Ballona Creek. The drainage basin will be vegetated with willows and other plants so it can provide both bio-remediation and habitat. Staff is recommending special conditions that will set standards for the capacity and design of that facility, as well as the methods employed for filtration.

The project involves the removal of about five acres of upland vegetative cover. Even though introduced annual grasses and weeds dominate the roadsides; they do provide shelter and some food for birds and other animals. The applicant is proposing to revegetate the 1.1-acre drainage basin and the roadside areas adjacent to Culver Boulevard and also to newly widened Lincoln Boulevard. In order to assure (1) continued provision of habitat and (2) to assure that the new landscaping will not invade areas slated for restoration, staff is recommending that the plant material used in the road side areas use mostly native plants, and any non-native plants be drought- tolerant and non-invasive.

The project is located in an area underlain by oil and gas bearing sediments, which release gas through the soil. There are measurable levels of thermogenic soil gas within the area, although most recent surveys indicate that concentrations of soil gas in the

immediate area of the proposed road are not hazardous and are lower than those found in Area D, which is located south of this project. The City is in the process of determining, what measures will be necessary to assure the safety of structures from a build up of soil gas in parking structures and basements. Given the necessity of measures to collect and vent soil gas in the neighboring area of the property, opponents have raised concerns that a road might also be subject to dangers from soil gas build up. Soil gases are dangerous when they build up in enclosed spaces and are then mixed with oxygen. The City of Los Angeles standards for protection of structures from soil gas exempt small structures and unenclosed areas from the burden of collecting and venting gases. The staff of the Department of Public Works indicates that the City has not experienced problems with soil gas under roads, even in areas where structures are required to collect and vent methane. The staff geologist has reviewed the available reports and concurs that construction of the road will not raise dangers from soil gas. A long awaited report from the City Legislative Analyst indicates that Area C is not subject to high levels of soil gas. One abandoned oil well, located in the vicinity of the roadway was detected venting less than 100 ppmv. This is a low level and is not expected to be hazardous. No underground deposits or gas reserves were detected in Area C.

The project will impact two mapped archaeological sites. Exploration and recovery of those sites is authorized in a programmatic agreement between the applicant, the US Army Corps of Engineers and the State Historic Preservation Officer. Exploration of these sites, but not recovery, is authorized in Coastal Development Permit 5-98-164. Staff recommends that the initial explorations be completed and the reviewing agencies determine that no further exploration is necessary before the issuance of the present permit.

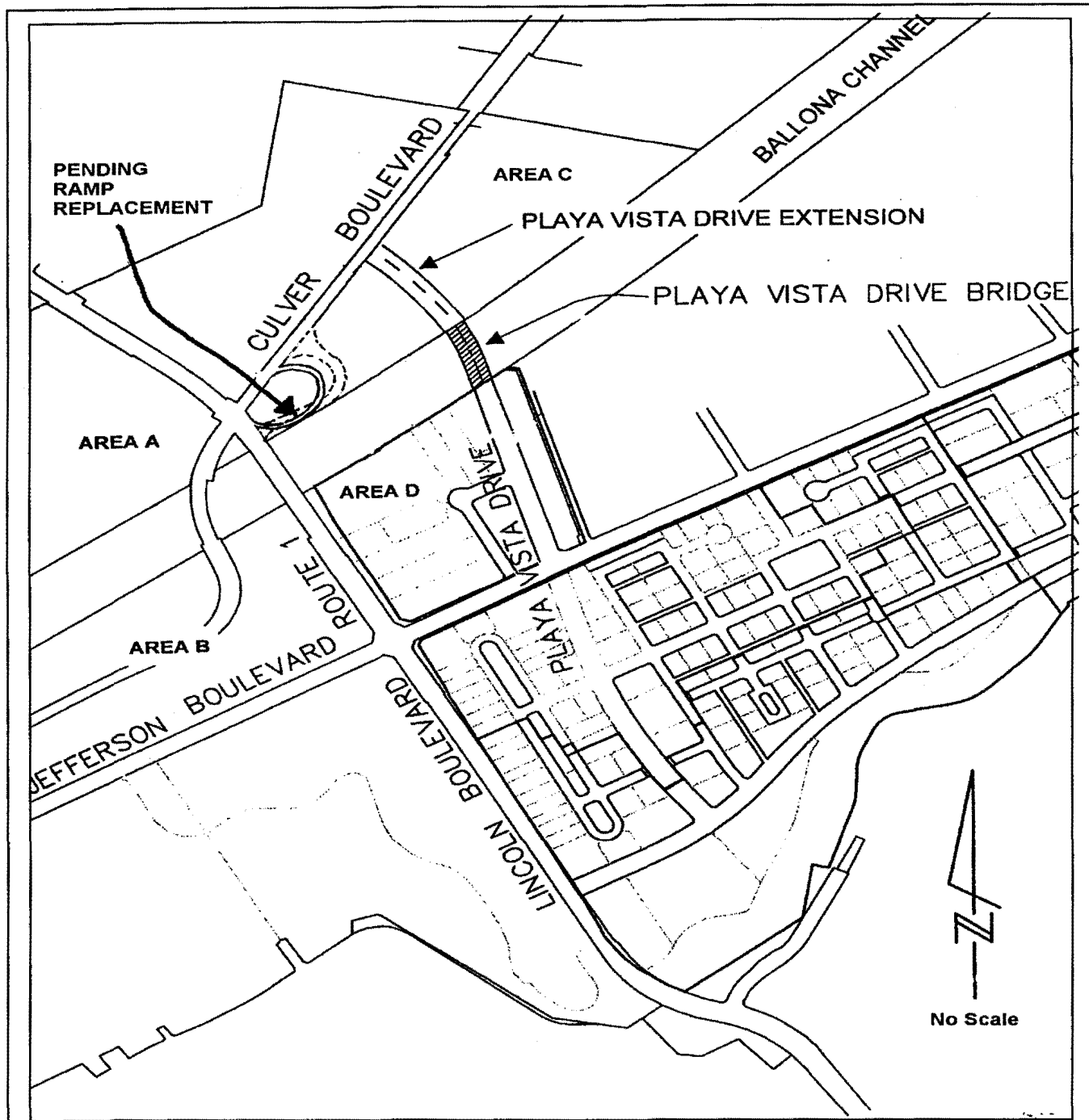


Figure 1. Project Location.

The coastal zone boundary follows the road south to the railroad to the south end of Ballona Creek and then to Lincoln. The bridge and Playa Vista drive and the Route 90 expansion will be submitted in the near future for CDP's.

Procedural Note:

This project is located in the City of Los Angeles, which has assumed pre-certification permit jurisdiction under Section 30600(b) of the Coastal Act. While there is a certified LUP for this area, the Commission has not certified implementation ordinances. Section 30600(b) allows a local jurisdiction to issue coastal development permits prior to certification of its Local Coastal Program, subject to appeals by any person within 20 working days of issuance of the permit.

The Coastal Act also identifies areas where irrespective of the City's grant of a coastal development permit in its pre-certification program, the Commission must grant a second coastal development permit for all development. Section 30601 establishes that, in addition to a permit from local government pursuant to subdivisions (b) or (d) of section 30600, a coastal development permit shall be obtained from the Commission for all major public works projects, for developments located within 100 feet of any wetland, estuary or stream, or located between the first public road paralleling the sea and the sea. The project is a major public works project. This road-widening project is also located between Culver Boulevard, a public road, and the Ballona Channel, which because it is subject to tidal action, is regarded as an arm of the sea for purposes of Section 30601. Finally, the ramps are located within 100 feet of Ballona Creek, a tidal estuary.

On January 11, 2001, the Commission found that the appeal of local permit CDP-3B, appealed as A-5-PLV-00-417 (Playa Capital Company LLC), raised substantial issue with respect to its conformity with the Coastal Act. This present action is a combined action on the De Novo hearing on Appeal A-5-PLV-00-417 and on permit application 5-00-400, which the applicant submitted in accordance with Section 30601.

To avoid confusion, there is one set of findings and conditions applying to both permits, since the standard of review for both permits is identical--the Coastal Act. However, there are two motions and two resolutions.

STAFF RECOMMENDATION:

The staff recommends that the Commission adopt the following resolutions to **APPROVE** the de novo permit and coastal development permit application with special conditions:

MOTIONS

"I move that the Commission approve with special conditions Coastal Development Permit 5-00-400 per the staff recommendation as set forth below."

"I move that the Commission approve with special conditions Coastal Development Permit A-5-PLV-00 417 per the staff recommendation as set forth below."

Staff recommends two **YES** votes which would result in the adoption of the following resolutions and findings. An affirmative vote by a majority of the Commissioners present is needed to pass each motion.

I. Resolution: Approval with Conditions of Coastal Development Permit 5-00-400

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Resolution: Approval with Conditions of De Novo Permit A5-PLV-00-417

The Commission hereby **APPROVES** a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

III. STANDARD CONDITIONS

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. Expiration. If development has not commenced, the permit will expire two years from the date this permit is reported to the Commission. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

IV. SPECIAL CONDITIONS

1. DRAINAGE FACILITY

A. Prior to issuance of the coastal development permit, the applicant shall provide final plans for the Water Quality and Habitat Basin for the Culver Loop Ramp and Widening for the review and approval of the Executive Director. In reviewing the plans, the Executive Director shall consult with the staff of the Regional Water Quality Control Board and the City of Los Angeles Department of Public Works. The final plans shall demonstrate that the system will be designed, implemented and maintained consistent with the following specifications:

- 1) The capture goal (the volume of runoff from the development to be captured and detained) for the extended detention/bio-filtration system, shall be no less than the volume of stormwater runoff from each runoff event, up to and including the 85th percentile, 24-hour runoff event (one inch in this location.)
- 2) The Water Quality and Habitat Basin shall be designed to provide a drawdown time (drain time) of no less than 40 hours for the capture volume.
- 3) Energy dissipaters shall be placed at the basin's entrance to minimize bottom erosion and re-suspension.
- 4) The basin shall be designed to provide bypass or have pass-through capabilities for large storm events; e.g. the 100-year storm runoff.
- 5) The system shall be maintained for the life of the project, in accordance with the applicable recommendations contained in the California Stormwater

Best Management Practice Handbook - Municipal (1993), which include, but are not limited, to the following:

- Conduct inspections semi-annually and after each significant storm; remove floatables.
- Check outlet regularly for clogging.
- Check banks and bottom of surface basin for erosion and correct as necessary.

6) Five years after installation is complete; the applicant shall test the soil horizon from the surface to six feet under the surface to detect significant buildup of toxic materials that might impact the ground water. The copies of the monitoring reports shall be provided to the Executive Director, the Los Angeles City Department of Public Works and the Regional Water Quality Control Board. Any removal and remediation of soils beneath the basin, if necessary, shall require an amendment to this permit. Periodic removal of accumulated sediments within the basin above the level of the finish elevation would not require an amendment to this permit.

7) Planting within the basin, and landscaping along the right of way, shall be installed as indicated in Condition 2 below, and maintained in accordance with the following water quality oriented "good housekeeping practices:"

(a) An Integrated Pest Management Program shall be designed and implemented for all of the proposed landscaping/planting on the project site. Because of the project's location within the immediate watershed of Ballona wetland, where feasible and appropriate, the alternatives to pesticides including, but not limited to, the following shall be implemented:

- Introduction of natural predators such as ladybugs, lacewings, garter snakes and toads. Also, some bacteria, viruses and insect parasites may be preferable to pesticides.
- Weeding, hoeing and trapping manually.
- Use of non-toxic, biodegradable alternative pest control products.

(b) Where pesticides and/or herbicides are deemed necessary in conjunction with the IPM program, the following shall apply:

- All state and local pesticide handling, storage, and application guidelines, such as those regarding timing, amounts, method of application, storage and proper disposal, shall be strictly adhered to.
- Pesticides containing one or more of the constituents listed as parameters causing impairment of the receiving waters for the

proposed development (Ballona Creek and Ballona Creek Estuary) on the California Water Quality Control Board 1998 303 (d) list shall not be employed. Products that shall not be employed are those containing the following constituents:

- Chem A. (group of pesticides) – aldrin, dieldrin, chlordane, endrin, heptachlor, heptachlor epoxide, hexachlorocyclohexane (including lindane), endosulfan, and toxaphene
- DDT

8) Limitations. This bio-remediation basin is sized to accommodate 5.1 acres of new pavement. If there is a changed pattern of water sources or if additional storm water is planned to be directed into this basin; the applicant shall notify the Executive Director who shall determine whether or not an amendment to this permit is required.

B. The permittee shall undertake development in accordance with the approved final plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

2. LANDSCAPING AND EROSION CONTROL PLANS

A. Prior to issuance of the coastal development permit, the applicant shall submit landscaping and erosion control plans, prepared by a licensed landscape architect or a qualified resource specialist, for review and approval by the Executive Director. The landscaping and erosion control plans shall address temporary and permanent vegetation within the Water Quality and Habitat Basin and along the roadsides from which vegetation will be removed in this and the related Lincoln Boulevard roadway adjacent landscaping. The plans shall be reviewed and approved by the Los Angeles City Fire Department, the Los Angeles City Bureau of Street Maintenance and or Caltrans to ensure that the plants are in conformance with fire and highway safety practices and shall also be submitted to the Angeles Region of the Department of Parks and Recreation for its comments. The plans shall incorporate the following:

I. Initial assessment: The applicant shall provide a brief initial assessment indicating the soils expected to be found after the project, the soils now found in the 0.19 acre "mulefat area", measures necessary to assure the soils in the basin will be appropriate for wetland plants, the amount of water to be expected, the amount of irrigation necessary to maintain the project,

and the measures that might be necessary to control invasive plants.

II. Habitat Goals. Prior to preparing the landscaping plan for the biofiltration basin, the applicant shall provide a statement of habitat goals, prepared by a biologist or licensed landscape architect for the review and approval of the Executive Director. The goals shall establish a minimum coverage of each type of plant community, following the general proportions shown in the applicant's initial plan of December 1, 2000, including no less than 0.6 acre of willows and other wetland plants. Plans and notes shall also indicate the goals underlying the choices of the other plants shown in the preliminary plan dated December 1, 2000 and indicate the habitat function of the proposed vegetation--the animals and other plants expected to benefit from the presence of the vegetation.

III. After approval of the plan in concept, the applicant shall provide detailed plans and notes that show the location of plants, sizes of container plants, density of seeds if seeds are used, expected sources of seeds and container plants, a schedule of installation and a statement describing the methods necessary to install and maintain the basin and the kinds and frequency of maintenance expected to be necessary in the long term. The plan shall be drawn up with consideration of the limitations noted in Condition 1 above. As much as possible, native plants shall be derived from sources located within the Ballona region.

IV. Based on the information in the plan and the initial assessment, the applicant shall prepare a monitoring schedule, providing (1) an initial report upon completion, to verify that the plants have been installed according to the approved plan, (2) no fewer than two additional reports in the first year, and (3) no fewer than one report in each subsequent year. The reports shall contain a brief description of the condition of the plants, the degree of coverage and the survival rate of various plants, either photographs, maps or illustrations and recommendations concerning activities necessary to achieve the stated goals. The applicant shall, at the appropriate season, replant to remedy the deficiencies noted in the monitoring reports.

V. Vegetation planted in the Water Quality and Habitat Basin shall be native wetlands, coastal sage scrub and coastal prairie plants as shown on the plans submitted December 1, 2000, as modified based on the assessment of soils, any comments of the Resources Agencies or as required by the Executive Director.

VI. Vegetation planted on the roadsides shall include a preponderance (75% or more) of coastal sage scrub plants sited and chosen to avoid a build up of fuel for fires and other hazards and to improve the appearance of the road

side. The goal of the roadside planting shall include buffering any future parks, trails or residential structures from the noise and visual impact of the road and providing an attractive passage through the area. Other low fuel plants may also be used, provide that they are drought tolerant and do not include invasive plants that may invade restoration areas of Playa Vista or nearby communities. Available lists of invasive plants are found in the California Native Plant Society, Santa Monica Mountains Chapter, document entitled *Recommended Native Plant Species for Landscaping Wildland Corridors in the Santa Monica Mountains*, dated January 20, 1992. The Executive Director may identify additional invasive plants.

VII. Such planting shall be adequate to provide 90 percent coverage within two (2) years, and this requirement shall apply to all disturbed soils;

VIII. Plantings will be installed at the conclusion of the installation of pavement and drainage pipes. They shall be maintained in good growing condition throughout the life of the Phase I Playa Vista project and, whenever necessary shall be replaced with new plant materials to ensure continued compliance with applicable landscape requirements.

B. The Permittee shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. The Executive Director may approve minor changes. No significant changes to the approved final plan shall occur without a Coastal Commission approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is required.

3. ARCHAEOLOGICAL EXPLORATION

Prior to issuance of the coastal development permit, the applicant shall provide evidence for the review and approval of the Executive Director that the archaeological exploration permitted under CDP 5-98-164 has been undertaken, and that the reviewing agencies (The United States Army Corps of Engineers and the State Historic Preservation Officer) have determined that no further investigation of the sites in the vicinity of the approved road widening project is required. If deposits or grave goods are uncovered during construction, work must stop until the archaeological monitor and the Native American monitor can evaluate the site and, if necessary, develop a treatment plan that is consistent with the programmatic agreement.

Once a site is determined to contain significant cultural resources, a Treatment Plan (Mitigation Plan) shall be prepared and reviewed by the appropriate Federal and State reviewing agencies. The Treatment Plan shall outline actions to be implemented to mitigate impacts to the cultural resources found at the site(s). To determine whether the Treatment Plan is consistent with the proposed permit or if an amendment to this permit or Coastal Development Permit 5-98-164 is required, the applicant shall submit a copy of the Treatment Plan to the Commission. The Executive Director, after review of the Treatment Plan, will determine if an amendment will be required. The Executive Director will require an amendment if there is significant additional excavation required or there is a significant change in the area of disturbance or change in the type of excavation procedures.

If remains are found, the Commission requires that the applicant carry out recovery or reburial consistent with the research design approved in the programmatic agreement and CDP 5-98-164.

4. MAINTENANCE AND DEDICATION GUARANTEES FOR LIFE OF ROAD

A. Prior to issuance of the coastal development permit the applicant shall provide an enforceable agreement for the review and approval of the Executive Director providing for maintenance of the extended detention/biofiltration basin for the life of the road. The agreement shall include a source of funds and an identified agency or entity responsible for the collection of funds and carrying out the requirements of Conditions one and two above.

5. INSTALLATION OF TEN-FOOT WIDE SIDEWALK

A. Prior to issuance of the coastal development permit the applicant shall submit revised plans for roadside improvements for the review and approval of the Executive Director. In addition to the landscaping required in Condition 2 above, the plans shall provide a ten-foot wide standard city sidewalk in a ten-foot corridor on the south side of Culver Boulevard in the area designated for that purpose. The sidewalk shall extend from the intersection with Route 90 to the proposed intersection with Playa Vista Drive.

B. Pursuant to this requirement, the applicant shall provide an Interim Change Authorization from the Los Angeles City Department of Public Works approving the location and design of these features. Said sidewalk shall be located so that it will be feasible to connect it with the existing sidewalk in the City of Los Angeles immediately outside of the Coastal Zone, north of Route 90.

C. The applicant shall construct said sidewalk at the same time as the roadways and shall complete the work under the same contact and within the same timetable.

6. STAGING AREAS, STORAGE OF CONSTRUCTION MATERIALS, MECHANIZED EQUIPMENT AND REMOVAL OF CONSTRUCTION DEBRIS, SAFETY FENCING AND CONSTRUCTION PRACTICES.

Prior to issuance of the coastal development permit, the applicant shall agree that all construction staging and heavy equipment routes, employee parking areas and equipment storage areas shall be located as shown in Exhibit 7. The applicant shall also identify all areas in which vegetation removal, vehicle access and or movement of heavy equipment are prohibited, and shall provide (1) detailed measures to prevent siltation during construction, (2) detailed measures to prevent unauthorized vegetation removal, and (3) plans showing the location and placement of safety fencing sited and designed to protect the public from construction hazards. Vegetation may only be removed from the approved roadway prism, from areas within twenty feet of the roadway prism and areas identified in Exhibit 7 approved staging and equipment areas. Pursuant to this requirement, the permittee shall comply with the following construction-related requirements:

- (a) In advance of construction, the applicant shall tape or fence all the boundaries of areas identified as approved for disturbance of vegetation in this permit. Contractors and equipment operators shall be notified of this restriction on the plans and by separate notice, and by visible signs;

- (b) No construction materials, debris, or waste shall be placed or stored where it may enter a storm drain leading to the ocean, Ballona Creek, or any area north of Culver Boulevard;
- (c) Any and all debris resulting from construction activities shall be removed from the project site within 24 hours of completion of construction;
- (d) Erosion control/sedimentation Best Management Practices (BMP's) shall be used to control sedimentation impacts to coastal waters during construction. BMPs shall include, but are not limited to: placement of sand bags around drainage inlets to prevent runoff/sediment transport into the storm drain system, covering dirt stockpiles, containment for asphalt, and a pre-construction meeting to review procedural and BMP guidelines; and
- (e) Construction debris materials and sediment shall be properly contained and secured on site with BMPs, or removed from construction areas each day that construction occurs to prevent the accumulation and/or unintended transport of sediment and other debris by wind, rain or tracking which may be discharged into coastal waters. Debris shall be disposed at a debris disposal site outside the coastal zone,

7. PROOF OF AUTHORIZATION TO CONSTRUCT ROAD WAY AND EXTENDED DETENTION/BIOFILTRATION BASIN AND TO CONDUCT MAINTENANCE WORK ON COUNTY PROPERTY.

- A. Prior to issuance of the coastal development permit, the applicant shall provide for the review and approval of the Executive Director a valid executed and recorded agreement from all owners of the land inside the "Culver loop" to allow the City and/or the applicant and/or its successors in interest to construct the project as described in this permit as approved and to enter and maintain the extended detention/biofiltration basin. Such agreement shall include a valid B permit issued by the City of Los Angeles Department of Public Works with an Interim Change Authorization to include all work authorized by this coastal development permit and either proof of City ownership of the land or a legally enforceable executed easement from Los Angeles County allowing them to carry out the work described in City of Los Angeles "B permit" issued for the work and this coastal development permit. Said easement shall have been approved as to form by the City Attorney of the City of Los Angeles and by the Los Angeles County Counsel and by the State Controller if a title report shows that any land inside the loop is owned by the State.

- B. Said agreement shall be recorded free of prior liens that the Executive Director determines might affect the ability of the applicant or its successors to carry out the intended maintenance or construction.
- C. The applicant shall carry out the work as indicated in this permit and in the B permit.

8. CITY PERMITS

Prior to issuance of the permit the applicant shall provide for the review and approval of the Executive Director proof that the City of Los Angeles has issued the B permit the Storm Water Pollution Prevention Plan, if required and all other necessary permits.

9. INSPECTION OF ABANDONED OIL WELL

Prior to issuance of the coastal development permit, the applicant shall provide evidence to the satisfaction of the Executive Director that the City of Los Angeles Department of Public Works and/or the State of California Division of Oil and Gas have been notified of the presence of the abandoned oil well identified in the City Legislative Analyst's report entitled "City Investigation of Potential Issues of Concern for Community Facilities District No. 4, Playa Vista Development Project, March 2001 (Methane Report), as located on or near the proposed loop road and have either determined in writing that re-abandonment is unnecessary or have approved plans and a time table for any necessary re-abandonment of such well.

V. FINDINGS AND DECLARATIONS

The Commission hereby finds and declares:

A. PROJECT DESCRIPTION AND BACKGROUND

The project before the Commission is to (1) add a loop ramp that will connect north bound Lincoln Boulevard to east bound Culver Boulevard, (2) relocate, improve the radius of and widen a second loop ramp that presently connects east bound Culver Boulevard with north bound Lincoln Boulevard, and (3) add a lane (38-41 foot wide strip) to Culver Boulevard on the south side of Culver Boulevard from Lincoln Boulevard to the Marina Freeway, (Route 90), (4) construct ground level ramps between Culver Boulevard and the Marina Freeway, (5) add lighting, drainage and landscaping, and (6) install a 1.1 acre extended detention/bio-filtration basin. Both the Commission and the City approved the ramp and road widening portions of this project in 1995 as 5-95-148(Maguire Thomas). Due to financial difficulties, the applicant did not construct the project and the permit expired. This and recently approved coastal development permit 5-99-139, improvements to Lincoln Boulevard, are applications to seek re-approval of two parts of the project approved in CDP 5-95-148.

The proposed street widening is required to mitigate traffic generated by Playa Vista Phase One, two tracts located outside the Coastal Zone that the City of Los Angeles approved in 1995 (see Table 1). This and other widening projects were mitigation measures imposed by the Phase I EIR, as amended. It will add 38 to 41 feet of pavement to the 34 to 37 foot-wide road, improve the safety of an existing ramp at Lincoln, provide a connection to north bound Lincoln from Culver Boulevard and provide an at-grade one way ramp connections at the Marina Freeway. The enlarged road would relieve Jefferson Boulevard from traffic seeking to take the northbound 405 from the homes and workplaces in the Phase I Playa Vista project and reduce its traffic impacts on Lincoln Boulevard, an already over-burdened north-south route.

There are other street and highway improvements that are expected to be submitted to the Commission in coming months. The applicant is currently seeking a City of Los Angeles coastal development permits for another required Phase I road improvement that will be located in Area C. This is the extension of Playa Vista Drive (previously identified as "Bay Street") from Jefferson Boulevard, over a new bridge over Ballona Creek, then through the present Little League ball field area to an intersection with Culver Boulevard, the street subject to the current application. The City has also required the applicant to change the geometry of the intersection at Culver Boulevard and Jefferson Boulevard in Area B from a "V" shaped intersection to a "T" intersection. Caltrans has submitted an application, still incomplete, for a full freeway interchange at Culver Boulevard and Route 90, bridging over Culver Boulevard at the Coastal Zone boundary. Caltrans has also released an EIR for widening Lincoln Boulevard to eight lanes from Hughes Terrace, at the southern end of

the Playa Vista project, to Fiji Way. These two Caltrans improvements are not required by the first phase of Playa Vista.

B. RIGHT OF THE APPLICANT TO SUBMIT THE APPLICATION

Section 12053.5(b) of the California Code of Regulations requires that an applicant for development shall provide documentation of its legal interest in all the property upon which work would be performed, if the application were approved, e.g., ownership, leasehold, enforceable option, or authority to acquire the specific property by eminent domain. If the applicant does not own the property, it must also provide evidence that the owner of the property has been invited to be a co-applicant.

The State of California owns Area C. Title is held by a trust company, the United States Trust Company of California N. A. for benefit of the State of California. When the previous owner of the property, Howard Hughes, died, his successor in interest, Summa Corporation, and the State agreed that the State would take Area C in lieu of part of the amount due in estate taxes. The State also agreed that the Summa Corporation or its successors could buy back the land for an agreed on sum by December 31, 2000. After that time, the State was not obliged to sell the property back to Summa's successor. The Applicant, Playa Capital Company, LLC, is Summa Corporation's successor. On December 31, 2000, the agreement between the State and the project applicant lapsed. Since the applicant does not own the property, opponents have now questioned the applicant's right to develop roads on it.

In response to questions concerning these issues, the applicant provided documents as listed below.

1. Security agreement regarding Area C between Kenneth Cory, State Controller and Summa Corporation, 1984, with first through fourth amendments.
2. Copy of October 30, 1998 correspondence from Chief Deputy Controller to US Trust Company of California with attached irrevocable offer to dedicate.
3. Easement agreement by and between Maguire Thomas partners—Playa Vista and the State regarding road and other improvements in Area C, dated August, 30, 1990.
4. Map and conditions of approval, Tentative Tract Number 44668, City of Los Angeles, May 4, 1987

The "security agreement" is the agreement in which the State accepted the Area C property but granted the developer the right to carry out a development proposal and to buy back the property at the end of 2000. The agreement let Summa or its successors develop and control the property until it could purchase the property. The security agreement conveyed the land to a trust company as trustee. When on December 31,

2000, the applicant failed to buy back the land on schedule, the security agreement terminated.

Independent of that agreement, in 1990, the State and the developer recorded an easement over the property that survives the termination of the security agreement. The 1990 easement relates to improvements that are defined in Section I.A.4, Page 3 of the easement agreement (exhibits) by reference to certain provisions of the security agreement between the State and Maguire Thomas Property Playa Vista (the applicant's immediate predecessor). The security agreement includes an exhibit, Exhibit B that lists road improvements contemplated, apparently for purposes of allocating the cost. The 1990 easement adopts the list by reference. These are described, essentially as the streets and roads within Area C that had been identified in the Playa Vista LUP, and in the City's Specific Plan for Area C.

In August 1990, the State granted a perpetual irrevocable easement to Maguire Thomas Partners Playa Vista and its successors in interest to "alter, improve, use, repair and maintain that portion of the "Burdened Property" (Area C), which constitutes the precise location of each improvement, to the extent reasonable and necessary." (Section II.A.1 and II.A.2.) It also requires the State to dedicate the improvements to the City once they are complete and their exact dimensions are known. Maguire Thomas Partners Playa Vista has the right to use the 1990 easement granted "provided that such improvement is or would be permitted pursuant to the terms of the security agreement, whether or not the security agreement is then in full force and effect." (II. B) This provision contemplates that the Playa Vista can still use the easements to construct the improvements even after the security agreement terminates. Further, the agreement states that the agreement and easements contained in it shall continue in full force and effect in perpetuity. (Section V.A.)

Improvements that the State agreed to were listed in Exhibit B to the Security Agreement. They included "Culver Boulevard construction," "Lincoln construction," "Bay Street", "bridges on Bay and Lincoln," and "connections to Route 90" (the Marina Freeway). The State however received rights to construct roads over Maguire Thomas Partners Playa Vista's property in order to develop Area C. (Exhibit)

The 1990 easement covers all improvements adopted in the certified Land Use Plan. The LUP lists the following improvements that involve Area C:

1. Realign and extend Culver Boulevard as a six lane divided road. [The plan proposes that the sharp "S" curve on Culver just west of Lincoln Boulevard be eliminated and a new bridge be constructed across Ballona Creek west of the existing bridge. Jefferson would then intersect Culver at a right angle. Six lanes would be provided between the Culver and Lincoln Boulevards interchange and Jefferson Boulevard] (*Staff Note: All of the preceding improvements are located in Areas A and B but not in Area C and are not*

before the Commission in permit 5-00-400 or appeal A-5-PLV-00-417) with eight lanes from Lincoln Boulevard to Route 90. Water flow under Culver Boulevard will be increased by additional culverts in order to improve the natural functioning of the wetlands.

2. At the Culver and Lincoln Boulevards interchange, Culver Boulevard should be lowered to at grade level with Lincoln Boulevard bridged over it, and the following ramps shall be provided:
 - a) A loop ramp in the southwest quadrant accommodating eastbound Culver Boulevard to northbound Lincoln Boulevard flow.
 - b) A straight ramp in the southeast quadrant accommodating northbound Lincoln to eastbound Culver boulevard flow.
 - c) A loop ramp in the northwest quadrant accommodating westbound Culver to southbound Lincoln Boulevard flow.
 - d) A straight ramp in the northwest quadrant accommodating southbound Lincoln to westbound Culver Boulevard flow
3. Widen Lincoln Boulevard to provide an eight-lane facility between Hughes way and Route 90.
4. Reserve right-of-way for a transit way linkage in the Lincoln Boulevard corridor.
5. Extend the Marina Freeway just west of Culver Boulevard with a grade-separated interchange at their intersection.
6. Extend Bay Street, north of Ballona Channel; as a basic four-lane facility constructing a bridge across the channel.

The proposed project includes two of the listed ramp connectors to Lincoln Boulevard, widens Culver to three lanes total, not eight, and includes at-grade ramp connectors to Route 90, which the applicant acknowledges is only part of the construction that will be required in the future if the rest of the Playa Vista Project proceeds.

In anticipation of the need to build these streets, the applicant and the US Trust recorded dedications in favor of the City of the land necessary for some of the proposed widening projects. The street dedications did not cover all land subject to this project. However, the 1990 easement agreement in Section II.C allows the developer (called benefited owner) to require the state (burdened owner) to dedicate additional land to the City for roads. (Exhibits)

Other parties (other than the Controller of the State of California) own some of the land proposed for road improvements. Prior to annexation of Area C and other areas of Playa Vista by the City, this section of Culver Boulevard was a County road, and the County owned the area within the loop of the road. It is not clear whether any specific action was necessary at the time of annexation to transfer the land to the City. Because property ownership records do not yet reflect any change in ownership, it is not clear whether the City of Los Angeles or the County of Los Angeles owns the present ramp connecting

Culver Boulevard to Lincoln Boulevard and the land between the present ramp and Lincoln Boulevard. Demolition of the existing ramp and installation of its widened version may require additional permission from Los Angeles County. Therefore, prior to issuance of the permit, the applicant must provide either proof of City ownership of the land or a legally enforceable executed agreement with Los Angeles County allowing them to carry out the work described in the City B permit issued for the work and in this coastal development permit. B permits are issued by the Los Angeles City Engineer per Section 62.105 of the Los Angeles Municipal Code which requires a B permit for any work on City property that requires a formal design or any improvement that is to be later dedicated to the City.

Upon issuance of a City of Los Angeles B permit, the applicant has the legal right to carry out those improvements that are located on City land. Since the applicant is obligated to improve the ramps by the mitigation measures imposed on the project by the City, and the City has issued a B permit approving the road design, no additional permission is needed to build the second ramp, which is on land dedicated to the City. US Trust has already recorded an offer to dedicate the land necessary to build the second ramp connecting Culver to Lincoln to the City of Los Angeles. Both ramps are described in the adopted plans cited in the 1990 easement, and again the City has required the ramps as a mitigation measure. Again since the second ramp is a requirement of the City's approval of the Phase I Playa Vista project, and the second ramp is noted in the 1990 easement and in the adopted plans cited in the 1990 easement, the applicant has a right to construct this connector road. The applicant asserts that a B permit has been issued.

Part of the Culver Boulevard widening is covered by a recorded offer of dedication and portions are not. However, as noted above, the 1990 easement grants the developer the right to carry out this street widening and improved connections to Lincoln and Route 90 (the Marina Freeway.) The applicant, who has the right to construct road improvements on its own land, owns the 40-50 foot strip of land located between Area C and Route 90, which will be traversed by the ramp connectors to Route 90. The applicant has provided an agreement with Caltrans that allows it to encroach on the highway to install the ramps (California Department of Transportation (CALTRANS), Encroachment Permit 798-6MC-0618; Encroachment Permit Rider 700-6RW-2956, November 8, 2000.) Caltrans has submitted an application to the Commission to widen and improve Route 90, indicating that their long-term plans also include an improved Culver/Route 90 interchange.

Upon examining the background material and legal agreements, the Commission finds that the applicant has provided documentation supporting its claim that it has the right to apply for this permit and if it approved by the Commission, to carry out the requested development.

C. PUBLIC SHORELINE ACCESS

The Coastal Act requires the Commission to protect shoreline access. Culver Boulevard is

a major coastal access route in a network of heavily traveled roads. It is already heavily traveled during peak hours. Culver Boulevard was first constructed in the late 1920's. It extends from Playa del Rey to the intersection of Venice, Robertson, and Exposition Boulevards, following the route of a railway line that once served the beach cities. Culver Boulevard crosses Lincoln Boulevard on a bridge and only one connection from Culver Boulevard to Lincoln is possible: travelers eastbound on Culver Boulevard from the beach can now use a ramp to transition to northbound Lincoln Boulevard. It is not possible to turn from Lincoln Boulevard to Culver in either direction, or turn off westbound Culver Boulevard to Lincoln Boulevard.

The purpose of this project is to divert traffic originating in Playa Vista Phase One from Lincoln and Jefferson Boulevards by providing an alternate route from Area D Playa Vista to the 405 Freeway via Route 90. In this way, it is expected to reduce Playa Vista Phase I traffic impacts on one of the more important coastal access routes in Los Angeles, Lincoln Boulevard (Route 1). The eastbound Culver Boulevard/Route 90 ramps are already heavily used, performing at Level of Service (LOS) D and E during the evening peak hour. Additional capacity is needed on these ramps to accommodate Playa Vista Phase I and to reduce impacts on commuters from South Bay communities who use Culver Boulevard to access the 405 Freeway. The new loop ramps will provide a connection from westbound Culver Boulevard to Lincoln and from there to the South Bay, Marina del Rey, Venice Beach or Santa Monica. The project will make it possible to reach Area C via Lincoln Boulevard, which is now not possible (Exhibits 3 and 5).

Section 30210 of the Coastal Act requires maximum access and recreational opportunities to be provided.

Section 30210.

In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.

Section 30252 requires that new development be sited and designed to reduce traffic impacts and to improve and protect access to the coast:

Section 30252.

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking

facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

This road widening is only one of the many road widening and other traffic mitigation measures that the City has required Playa Vista Phase One to provide. The Phase I EIR requires many automobile and non-automobile traffic mitigation measures (Exhibits 4 and 18). Traffic calculations for the entire project predict that the location of commercial, business and residential uses in the same complex, combined with the provisions of internal jitneys, will reduce the number of trips generated by the project by as much as 25% (when the project is built out). The project also includes measures to improve mass transit serving the project, although traffic planners indicate that no more than 2% of trips will occur on mass transit. The non-automobile traffic mitigation measures include alteration of traffic signals on Lincoln Boulevard to allow "smart" signals that will increase speed of busses and internal jitneys. Despite the careful planning, Playa Vista Phase I will have major impacts on the street system because it is a big project that will generate many trips.

The applicant's traffic engineers predict that 98% of trips from Phase I will be by automobile. Because most employees and residents of Phase I will make most trips in private cars, the project traffic mitigation measures must include widening streets and intersection improvements in a wide area surrounding the project. The purpose of the street widening and ramps proposed in this project is to allow private automobiles to leave the Playa Vista Phase I and reach the freeway system without impacting Lincoln Boulevard, which is one of the most heavily traveled streets in the City. A second required connection (Bay Street or Playa Vista Drive), still under review by the City Department of Public Works, would connect the center of Area D to Culver Boulevard by means of a bridge over Ballona Creek (exhibit). The two connections would divert traffic from both Lincoln and Jefferson Boulevards enabling commuters and residents to reach the Marina Freeway without entering Lincoln Boulevard. The applicant intends to submit an application to the Commission for Bay Street/Playa Vista Drive, a new street, in the near future, after the City completes its permitting process.

The applicant asserts that the purpose of the present project is to reduce the impact of Playa Vista Phase One on coastal access routes, including Lincoln Boulevard and improve public access to Area C. The road widening proposed in this application will reduce impacts on beach access routes, and make access to Area C possible from communities to the north and the south. The improvement of access and the mitigation of impacts to access attributable to an approved project that is located outside the coastal zone are consistent with the public access policies of the Coastal Act. Increased traffic on Lincoln Boulevard would have adverse impacts on beach access and public recreation

and the proposal subject to this application will address and mitigate, in part, such impacts.

B. RECREATION.

The Coastal Act provides for protection of oceanfront land that is suitable for recreation and for recreation support.

Section 30220

Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.

Section 30223

Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.

The Controller has initiated a process that could lead to the State retaining Area C for public park purposes. The investigation is in its initial stage only. No funds have been allocated to create the park, and no legislative authorization to convert the land is yet approved. While no final decision has been made concerning the disposition of the property, the Commission can consider the compatibility of a 74-foot, three-lane roadway with a park. The Commission's ability to deny a project based on future use of the area as a park is limited by Section 30604(e), which states:

(e) No coastal development permit may be denied under this division on the grounds that a public agency is planning or contemplating to acquire the property on, or property adjacent to the property on, which the proposed development is to be located, unless the public agency has been specifically authorized to acquire the property and there are funds available, or funds which could reasonably be expected to be made available within one year, for the acquisition. If a permit has been denied for that reason and the property has not been acquired by a public agency within a reasonable period of time, a permit may not be denied for the development on grounds that the property, or adjacent property, is to be acquired by a public agency when the application for such a development is resubmitted.

The Commission notes that the 1990 easement does not allow the underlying landowner or its successor to object to the improvement. The Commission can, however consider methods to mitigate impacts on adjacent landowners and occupants, including possible parks.

Presently, the road is two lanes wide and carries significant commuter traffic. It is hazardous to cross during morning or evening rush hours. Staff consulted with

representatives of State Parks regarding their experience with major roads in parks. Many State Parks, such as California's north coast parks include major highways. In many ways, roads are difficult to manage in parks. This is because roads can cut off corners of a park, cut off habitat and can be a source of noise, reducing the quality of the recreational experience. They can be hazardous, and they can be barriers. An unrelieved expanse of asphalt is not attractive in an area that is supposed to represent and interpret California's natural heritage. The Department of Parks and Recreation is developing a plan to construct a park in the Baldwin Hills which is crossed by two heavily traveled roads, La Cienega and La Brea Boulevards. As is the case with this road, there is little option to re-route the roads to a different location, because the roads are long established links in the transportation grid.

Although there are impacts, roads are necessary to provide access. Without the planned ramps, there is very limited access to this parcel. Few visitors, even in cities, go to parks on a bus. Roads can be used for parking and can separate active recreation areas and areas where human traffic should be limited. They can provide views of a park and retained natural open space.

The City of Santa Monica has recently adopted an open space plan that suggests methods to mitigate the visual and noise impacts of its roads and highways. One of the prime techniques suggested is the use of extensive planting. This includes street trees, landscaped median strips; jogging trails integrated with the roads, and the installation of a "freeway forest".

The simplest solution to soften the visual impact of the road would be to install a sidewalk or jogging trail where it can be safely accommodated and a vegetated strip beside the road. The applicant's traffic engineer and the City Department of Transportation oppose on street parking, recommending that a driveway and a small parking lot be accommodated along with the next planned improvements—the Playa Vista Drive (Bay Street) element of these roads. A seventy-two foot roadway can accommodate on-street parking, the present roadway cannot, but this road was not designed with adequate capacity to provide on street parking. Permission from the landowner is necessary before parking lots or trails elsewhere on the parcel can be constructed. For this reason, all public access improvements are part of the planned roadway and are located on the roadway within the scope of the initially anticipated Culver Boulevard roadway improvements. Vegetation can soften the visual impacts of a road and a vegetated strip is also required adjacent to this road and to related portions of Lincoln Boulevard.

Parking. The current road does not have a paved shoulder and cannot provide any safe parking. One way that roads serve parks is to provide parking and entry to the park. A relatively quick and inexpensive way to provide public access support is to designate roadside areas to provide weekend parking. There is currently a bicycle path on the flood control right-of-way on Ballona Creek, adjacent to Area C. There is now no parking in

Area C to serve this bike path and no real way to get to the bike path from the roads in the area.

Vegetated strip. There are several constraints on vegetation. Typical street trees are not consistent with the native vegetation that is found in this area, which is dominated by coastal sage scrub and dune plants. If this area were restored as habitat, possibly wetland, plants consistent with restoration would be necessary. However, one obstacle to restoration is the presence and the persistence of introduced grasses and invasive weeds that colonized the area after the fill was placed in the late 1950's and early 1960's. The other constraint is the quality of the soils, which are sandy dredge spoils, which may need significant alteration to support coastal sage scrub or wetland plants. If a park is developed, a long planning process will be necessary to determine the revegetation plans and the ultimate mix of activities. A landscape plan that would be compatible with restoration of Area C as a park or with future use for other purposes would include a coastal sage scrub buffer zone between the road and the rest of the area. Taller varieties of coastal sage scrub can mask the road from the other areas. Even a three foot high bush is higher than many cars, and will achieve some reduction in the visual impact of the road.

Jogging or bicycle trail. The applicant's plan for this area shows jogging trails and bike paths along several of the future streets in Area C, but not along Culver Boulevard. Instead the bike paths were to connect to the Ballona Creek path on the south property line and over a new bridge connecting through Area D and eventually with Jefferson Boulevard, which is popular with recreational cyclists. The LUP provides for bicycle and jogging trails. More generally it states:

2b.2 As defined by the Coastal Act and specified in the specific design guidelines for each parcel in the local implementation program, new development shall provide additional recreational opportunities, including trails, bikeways, (additions and/or extensions of existing bike paths), open space/park areas and viewing areas as appropriate. Adequate support facilities (bike storage lockers, drinking fountains, etc.) shall also be provided.

Policy 3 refers mostly to Area B but also describes a trail along Culver Boulevard linking with the bike trail along the flood control channel in Area C. Playa Vista's eventual plans included a network of jogging trails. Several were planned for Area C, although none are designated along Culver Boulevard, which was identified as a major road. Currently, there is a jogging trail in the Culver median strip in Culver City and in Los Angeles, although just north of the Route 90 interchange, Culver Boulevard narrows and in this area, there is only a sidewalk. If it were possible to coordinate with Caltrans during consideration of their planned improvement to make it possible to route a trail under Route 90, a path in Area C could connect with existing trails. Such a trail would provide non-invasive recreational use pending more detailed park planning. An interim soft-footed trail along the south side of

Culver Boulevard could be installed as part of this permit. If eventual plans show a different route, removal or relocation of such a trail could be easily accomplished.

Ultimate approval of either the applicant's final plan or a plan to develop the area as a park will take a number of years. The Commission finds that, as conditioned, to provide a sidewalk, and to landscape the road side with vegetation that can shelter and buffer the rest of the Area C from the noise and visual impact of the road on the park, this project will have minimal additional impact on any future park, given that the road and its traffic already exist. As conditioned, the project is consistent with Sections 30220, 30223, and 30604 of the Coastal Act. It provides additional recreational support to mitigate the impact of its increased traffic, and it does not commit the area to urban development.

D. MARINE RESOURCES

The project is proposed in an area that included a historic wetland. The area within the footprint of the proposed improvement is not a wetland. The project however will drain into Ballona Creek, which is an estuary.

Sections 30230 and 30231 of the Coastal Act state:

Section 30230.

Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

Section 30231.

The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

IDENTIFIED WETLANDS

The Department of Fish and Game has identified 2.5 acres of wetland in Area C (Exhibit 11, p6). The identified wetland areas constitute a drainage channel (the Marina Drain) that flows into the Marina del Rey and also a patch of Salicornia near the northwesterly corner of the site (exhibit). The drainage channel is an identified Corps wetland. It flows in a culvert under Lincoln Boulevard into a similar channel in Area A that drains, through another culvert into Marina Basin H. Any fish found on the site would reside in this channel that has water. There is no other open water area in Area C. The widened road will not encroach into either of these identified wetlands; in fact both are north of Culver, while the widening and the ramps are south of Culver. The proposed street drains are will drain into the Ballona Creek and not to the Marina Drain or the patch of Salicornia identified elsewhere.

There is a twenty-foot high mound of fill south of Culver Boulevard between Culver Boulevard and Ballona Creek that is occupied by Little League ball fields. West of this mound, and east of the present ramp, there is a 0.19-Acre depression. This depression supports some vegetation, including introduced weeds and mulefat. Mulefat, (*Baccharis silicifolia*) is a native plant that grows along streams, on the borders of wetlands and in areas that are seasonally wet. It is a wetland facultative plant, which means that it tolerates wet and saturated habitats, but is not dependent on them. It also is found in areas that are not wetlands or stream banks.

Under the Cowardin method of wetland delineation, a method used by the Department of Fish and Game in California, a site is a wetland if one of the following applies:

- 1) the area is periodically covered by shallow water, or
- 2) the soils are hydric (dark soils evidencing long term saturation), or
- 3) the vegetation found in the area is predominately wetland vegetation.

The area in which the proposed road widening is located is a historic wetland that has been altered by fill, by the channelization of Ballona Creek in the 1930's and by the construction of the marina in the 1950's. It is not flooded. The applicant submitted a soils report shows that the soils are not hydric, confirming reports prepared by the previous owner during preparation of the LUP. However, mulefat does appear in wetlands or adjacent to streambeds.

In this case, the Commission staff biologist visited the site at the invitation of the applicant. He reported that under the mulefat he observed a thick cover of other species of plants. These plants, fennel, chrysanthemum, bristly oxtongue and mustard are weedy species that invade vacant fields. These weedy species were the predominate vegetation on this portion of the site. The staff biologist determined that this 0.19-Acre patch of mulefat and other species was not a wetland. Nonetheless, the staff biologist determined that the site did have some habitat value. The area in which the mulefat is found is where the fill supporting the ramps will be placed. The mulefat will be removed. The fill of this area without replacement of some vegetation that could provide comparable habitat value does

raise an issue of an impact to habitat and loss of habitat values. However, the applicant proposes to replace this 0.19 -Acre area with a 1.1-acre extended detention/biofiltration basin that will support a mixture of wetland and coastal sage scrub vegetation. This vegetation will supply feed, roosting areas and cover to resident birds. If native plants are used, and the applicant does not use persistent or heavily toxic pesticides, insects that depend on these plant communities may persist or return to the revegetated areas. Although not part of the original application, the vegetated basin has been found consistent with the permit by the City staff because the City permit was approved on the basis of the projects' consistency with the mitigation measures of Tract 49104 which required capture of trash and other pollutants. The planting represents a 4:1 replacement of the mulefat/mixed forbs area with a mixed wetland and upland assemblage of plants.

However, the Commission cannot find that this area provides adequate vegetative cover for the displaced birds and other animals unless:

- 1) The vegetation employed will support native birds and insects, which involves using native plants,
- 2) The vegetative cover in areas that have been denuded by road widening is replaced; and
- 3) There is an agreement acceptable to the City that this roadside landscaping will be part of the project landscaping and maintained for the life of the road approved in this project.

The applicant and the City have agreed on an enforceable method to maintain Phase One open space. Maintenance involves both physical maintenance, such as replacing failed plants as required in Condition 1 and 2 of the permit and the identification of a successor in interest that can agree to maintain the area. The City of Los Angeles has required that the applicant and its successor take this responsibility for long-term maintenance by means of bonds and assessment districts payable by successors in the served areas.

RUNOFF

The applicant notes that the addition of a loop ramp and widening of Culver Boulevard would increase the impervious surfaces in Area C from 2.53 acres to 7.40 acres (including future road areas) of the total project drainage area of 21.3 Acres. Moreover, impervious areas result in an increase in the volume and velocity of runoff, due in part to the loss of infiltrative capacity of permeable space. Runoff conveys surface pollutants to receiving waters through the storm drain system.

Pollutants of concern associated with the proposed roadway development include heavy metals (copper, zinc, and lead), oil and grease. Other pollutants commonly found in urban runoff include pesticides, herbicides, suspended solids, floatables, and bacteria.

The receiving waters for the development, Ballona Estuary and Channel are listed on the 303(d) list of impaired water bodies. According to the California Water Quality Control Board 1998 303 (d) list, the following parameters are causing impairment: Heavy Metals, Pesticides, Chem.A, PCBs, Tributlyn, Trash, Enteric Viruses/High Coliform bacteria counts, toxicity and sediment toxicity.

The applicant's consultant from GeoSyntec has examined the effect of the proposed development on the receiving waters, in part, relative to these parameters. A thorough discussion is provided in a GeoSyntec Consultants Report entitled "Stormwater System Water Quality Evaluation Report – Culver Loop Ramp and Widening" dated November 30, 2000, and signed by Eric W. Strecker, Associate GeoSyntec Consultants.

The proposed stormwater system involves a storm drain system comprised of catch basins (inlets) and pipes that convey runoff off the roadways, and an extended detention biofiltration basin, to be located in the center area of the loop ramp, which will detain and treat runoff from the Playa Vista Culver Loop Ramp and the Culver Boulevard Widening Project. The extended detention/biofiltration basin will drain to the Ballona Channel.

The proposed extended detention/biofiltration basin incorporates a series of earthen vegetated berms that will direct water through native vegetation. The basin will provide pollutant removal through settling and biofiltration functions. According to the applicant's consultant, the extended biofiltration system was chosen because of its "expected high effectiveness in achieving good stormwater effluent quality ... and because of the fact significant land area was available for such a facility in the center of the loop. The consultant believes that, when practical, above-ground facilities are preferable to below ground, because they typically have improved performance due to more enhanced removal mechanisms such as photo-degradation." The consultant also indicates that with such a system, needs are more visible.

With respect to heavy metals, the consultant asserts that due to the significant over-design of the BMP, the planned design of the system to treat existing runoff which is mostly untreated today, as well as runoff from the new impervious surfaces, (roads proposed for the area in the future) and the targeted efficacy of the BMP, cadmium and other heavy metals are expected to be addressed by the BMP, and quality of stormwater discharged from the site will almost certainly improve. Many of the pesticides of concern such as DDT, and from the Chem A group Aldrin/dieldrin and toxaphene, endrin, heptachlor, and heptachlor epoxide are now either banned or no longer in general use. Therefore, the proposed development is not expected to introduce these constituents to stormwater from this project. Additionally, the applicant's consultant contends that paving and landscaping should, in general, help to contain any historical sources of the pesticides in developed areas. According to the consultant, PCBs are typically highly absorbed to particulates, thus the proposed Best Management Practice (BMP)(described in detail below) should be effective at reducing any minor concentrations which might be present.

Tributlyn is found in anti-fouling paints for vessels and is not expected to be present in new urban development of this type. The proposed BMP is expected to collect trash and reduce levels of coliform bacteria. The consultant contends that levels of coliform bacteria can be reduced by over 50% in water quality basins (such as the proposed BMP described below).

The applicant considered the new stormwater mitigation requirements adopted by the Los Angeles Regional Water Quality Control Board (RWQCB) (Resolution No. R-00-02 [January 26, 2000] and Final Standard Stormwater Mitigation Plan [SUSMP][March 8, 2000]). Based on the consultant's calculations, the extended detention/biofiltration basin designed as proposed, will be able to accommodate eight (8) times the required minimum detention volume (3/4 of an inch in 24-hours) pursuant to the LA SUSMP requirements.

The Commission finds, however, that the performance of an extended detention biofiltration basin as a water quality treatment BMP intended to "treat" the capture volume, is dependent upon a variety of design influenced factors. It is critical to provide sufficient drawdown time for the capture volume, in order to produce a treatment function, which will occur through settling of solids and biological uptake through vegetation. According to the California Stormwater Best Management Practice Handbooks (1993), research demonstrates that a drawdown time of 24-40 hours for an extended detention basin, generally results in a removal efficiency of 60-80%. However, 40 hours is recommended in order to settle out the finer clay particles in California sediment that typically absorb toxic pollutants. In this case, due to the state of the receiving waters (parameters of impairment include toxicity and sediment toxicity), and due to the feasibility based on basin design, the Commission finds a 40-hour drawdown time is appropriate. Therefore, Special Condition 1 requires that the basin be designed to provide a drawdown time of 40 hours for the capture volume. This and other design specifications required by Special Condition 1 are based on recommendations contained in the California Stormwater BMP Handbook Municipal Volume (1993), project and site specific considerations described above. The Commission finds that if properly designed, extended detention/biofiltration basins can be very effective at removing constituents such as sediment, nutrients, heavy metals, toxic materials, floatables, oxygen demanding substances and oil & grease.

Further, the Commission finds that the use of vegetation combined with detention, as proposed, will significantly enhance the efficacy of the BMP by allowing biofiltration to occur. The value of this function is expected to offset potential impacts of vegetation maintenance. The offset will only occur if native wetland plants are used in saturated areas and native drought tolerant vegetation is used on the upper berms, coupled with an efficient low flow irrigation system, if such a system is necessary. In addition, Integrated Pest Management (IPM) techniques must be employed to avoid the release of toxic materials generated by the system itself. Integrated pest management techniques are more fully described below. These provisions are critical to reduce potential impacts, which could otherwise be associated with landscaping, such as the application of fertilizer and pesticides, which are sources of pollutants such as nutrients and organo-phosphates.

It should also reduce intensive irrigation, which can also result in runoff, a carrier for pollutants.

The applicant proposes to commit to "minimizing the use of pesticides and herbicides through the use of native vegetation in much of the landscaping of the right-of-way and the BMP area (the loop) itself, and through careful and minimal applications and storage of any such materials". In fact, in this case, the applicant has agreed not to employ highly toxic or persistent pesticides to kill insect predators.

The Commission finds the use of native or adapted vegetation greatly reduces the need for intensive irrigation, which in turn reduces the potential for excessive irrigation to result in nuisance runoff from the site. Therefore, Special Condition 2 requires vegetation selected for landscaping to be native wetland vegetation within the saturated area of the basin and native drought-tolerant species with some adapted non-invasive material along roadsides. Additionally, any irrigation system used is required to be efficient; this will serve to prevent excess irrigation and resulting nuisance runoff from occurring. Plants that are well suited to regional conditions most often do not have to be sustained with heavy fertilizer or pesticide applications.

The Commission also finds that the use of native and drought-tolerant or adapted non-invasive vegetation will minimize the need for topical agents such as fertilizer and pesticides, thereby minimizing pollutants susceptible to stormwater and nuisance runoff from the site. However, due to the impaired state of the receiving waters, the Commission finds that the applicant should pursue all feasible opportunities to further reduce the potential for the development to contribute pollutants to Ballona Creek and Estuary, particularly those parameters which have been cited as causing impairment to the waters.

The proposed use of native vegetation is an opportunity to use an Integrated Pest Management (IPM) Program. Alternative pest control techniques such as Integrated Pest Management and/or the use of non-toxic products can be effective in maintaining native or adapted vegetation, and therefore a potentially feasible option. IPM is an integrated approach, which combines limited pesticide use with more environmentally friendly pest control techniques. The goal of IPM is not to eliminate all pests, but to keep their populations at a manageable number. Pesticides can be a part of IPM techniques, but they are used in small quantities and only after all other alternatives have been reviewed. In this location next to a wetland, highly toxic and persistent chemicals should not be used, even if on occasion, plants sustain some damage. Therefore, Special Condition 1 requires the development and implementation of an IPM program for landscaping maintenance.

As conditioned, the Commission finds the proposed stormwater system, and low-maintenance landscaping plans, shall serve to minimize impacts associated with stormwater and non-stormwater runoff from the proposed development, in a manner consistent with the water and marine resource policies of the Coastal Act.

D. HAZARDS.

The Coastal Act requires that the Commission examine development in terms of its effects on human safety and the safety of the development itself.

Section 30253 of the Coastal Act states:

Section 30253.

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
- (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.
- (3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development. ...

This development is in an area that faces a number of risks:

Flooding. Historically, this area was subject to flooding. In the mid-thirties the US Army Corps of Engineers channelized Ballona Creek, which reduced flooding. However all flood control channels were designed on a model of the most likely storm and on level of runoff that was expected at the time the system was designed. With the increase of impervious surfaces in Los Angeles, some flood control facilities reach their capacity more often than in the past. According the Los Angeles County Flood Control District planners this facility was sized to accommodate the 1934 storm which is the equivalent of a hundred year storm; the recent information about the size of Los Angeles area storms indicates that many facilities designed for that storm may be over sized.

Earthquake. Because of high ground water levels and the presence of unconsolidated sediment, the area is subject to liquefaction. The certified LUP requires calculations of very high (0.5g) levels of bedrock acceleration prior to construction due to this condition. In the first phase EIR, it is estimated that after compression and dewatering, only the top four to six inches could liquefy in the event of a local severe earthquake. While this is not a significant amount for a road, it is significant for buildings. All new buildings will require special foundations as have been installed in the newer buildings along Lincoln Boulevard. Reports by ETI (April 17,2000) to the City indicated a possibility of a fault east of and parallel to Lincoln Boulevard have caused great concern. Further studies by the project geologists, and by consultants employed by the City Legislative Analyst have indicated

that there is no evidence that such a fault exists. (See Substantive File Document Numbers 16, and 19)

Methane. The City is still debating the type and amounts of methane mitigation to require in new buildings in Playa Vista. Oil and natural gas deposits release gas through the soils in various concentrations. In Area D some soil gas has been measured in heavy enough concentrations to require "mitigation": foundation membranes, venting devices and the like. The Department of Building and Safety has adopted procedures and standards for reviewing development proposals in areas in which concentrations of soil gas have been measured: City of Los Angeles Department of Building and Safety, Memorandum of General Distribution, #92: Methane Potential Hazard Zones, March 19, 1991. To address neighboring Area D, the City Council established a committee, chaired by the City Legislative Analyst to study whether the presence of methane in this area could or should change the City's decision to guarantee Mello/ Roos road improvement bonds for the project. The bonds would be obligations of the future owners of this project. (Exhibit 13)

The most thorough study of soil gas emissions, the Jones ETI study, was done for adjacent Area D. The survey showed that concentrations in Area D were high enough to raise concerns about the safety of enclosed structures. The applicant has provided geology reports that also conclude that the road will be a safe structure. The soil gas survey prepared on behalf of the applicant for Areas A and C showed strikingly lower levels of concentrations of methane gas than the survey done for Area D. The City Department of Building and Safety has now approved that survey. (Exhibits 12, 13)

Neither the City of Los Angeles Department of Public Works nor the project geologist found that such concerns applied to a road, a structure that is not enclosed but is placed on the ground surface. As noted above, the City Department of Public Works states that the City has not experienced problems associated with roads that have been located in high soil gas areas. After careful examinations of technical reports, including the methane gas surveys, the Commission's staff geologist has found no evidence that soil gas represents a hazard to the safety of the proposed road or the travelers on it. The staff geologist reviewed the Camp Dresser and McKee 2000, "Soil gas sampling and analysis for portions of Playa Vista Areas A and C near Culver Boulevard Widening Project" report cited above and concluded:

" Although the sample spacing was too coarse to adequately delineate an anomaly, it was appropriate for the detection of an anomaly sufficient to pose a hazard to the proposed development.

The report indicates that soil methane concentrations encountered range from 0.48 to 5.43 ppmv. For reference, the concentration of methane in the atmosphere is currently about 1.75 ppmv, and the lower explosive limit of methane is 50,000 ppmv; thus the values reported in the referenced document represents essentially

background levels. ... Accordingly, it appears that no significant methane seeps occur in the area investigated.

Further, methane would only be able to attain dangerous levels if it were allowed to accumulate in an enclosed space. No such enclosed space exists beneath a roadbed. ... Therefore, it is my opinion that no explosion hazard exists in association with the widening of Culver Boulevard between Lincoln Boulevard and the Marina Expressway, nor will the construction of a ramp between Culver and Lincoln Boulevards create such a hazard." (Exhibit 14)

The Commission finds that, as proposed, the project is consistent with Section 30253 and raises no issues of hazard to life and property. Section 30253 also requires conformity with the standards of the air quality district. The air quality district does not regulate methane. The increased traffic with associated increase in the discharge of more pollutants, is a function of the Phase I development and not this road. This road itself will not contribute to air quality problems.

E. CULTURAL RESOURCES

Section 30244 of the Coastal Act states:

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

Both the Coastal Act and the City's certified Land Use Plan require mitigation measures for development areas that contain significant cultural resources. In 1991, the Corps, the Advisory Council on Historic Preservation and the California State Historic Preservation Officer, with the approval of the Gabrielino (Tongva) tribal representatives, authorized a research and recovery project for all the identified or suspected archaeological sites in the Playa Vista project area. In 1998, the Commission approved Permit 5-98-164 that authorized preliminary exploration of the identified sites in the Coastal Zone portion of the Playa Vista Property. In approving Permit 5-98-164, the Commission found:

The proposed Research Design also includes detailed field and laboratory methods.

The proposed Research Design conforms with the Programmatic Agreement among the Corps of Engineers, the Advisory Council on Historic Preservation, and the State Office of Historic Preservation. In addition, the Programmatic Agreement has been reviewed and signed by Vera Rocha, Tribal Chairman of the Coastal Gabrielinos, Manuel Rocha, spiritual leader, and Cindi Alvitre, Chairperson Tribal Council.

To assure that the proposed project remains sensitive to the concerns of the affected Native American groups, a Native American monitor should be present at the site

during all excavation activities to monitor the work. The monitor should meet the qualifications set forth in the NAHC's guidelines. As a condition of approval, an on-site Native American monitor that meets the qualifications of the NAHC's guidelines shall be required during excavation activities. Therefore, as conditioned, the proposed project is consistent with Section 30244 of the Coastal Act, which requires reasonable mitigation measures to be provided to offset impacts to archaeological resources.

According to the project's archaeologist, once a site is determined to contain significant cultural resources, a Treatment Plan (Mitigation Plan) will be prepared and reviewed by the appropriate Federal and State reviewing agencies. The Treatment Plan will outline actions to be implemented to mitigate impacts to the cultural resources found at the site(s). To determine whether the Treatment Plan is consistent with the proposed permit or if an amendment to this permit is required, the applicant shall submit a copy of the Treatment Plan to the Commission. The Executive Director, after review of the Treatment Plan, will determine if an amendment will be required. The Executive Director will require an amendment if there is significant additional excavation required or there is a significant change in area of disturbance or change in the type of excavation procedures.

In the event that grave goods are discovered, the Research Design provides that upon the discovery of human remains, the Los Angeles County Coroner's Office will be notified in compliance with state law, and they in turn will request the Native American Heritage Commission to determine the cultural affiliation.

The Commission approved the exploration but required the applicant to return for an amendment or for a new permit if recovery was necessary. Two archaeological sites identified for exploration in 5-98-164 are located within the footprints of the proposed road improvements. To avoid work in advance of preliminary exploration, the Commission requires that the approved initial exploratory work in Area C be complete, and the parties agree that no further work is necessary before the grading or excavation proposed in this project can take place.

However, the Commission also requires that if deposits or grave goods are uncovered during construction, work stop, and a treatment plan be developed that is consistent with the programmatic agreement. The Treatment Plan will outline actions to be implemented to mitigate impacts to the cultural resources found at the site(s). To determine whether the Treatment Plan is consistent with the proposed permit or if an amendment to this permit is required, the applicant shall submit a copy of the Treatment Plan to the Commission. The Executive Director, after review of the Treatment Plan, will determine if an amendment will be required. The Executive Director will require an amendment if there is significant additional excavation required or there is a significant change in the area of disturbance or change in the type of excavation procedures. If remains are found, the

Commission requires that the applicant carry out recovery or reburial consistent with the research design approved in the programmatic agreement and CDP 5-98-164.

The Commission finds, therefore, that, as conditioned, the proposed project is consistent with Section 30244 of the Coastal Act. The Commission notes that any additional work not described under the Commission's previously issued permit 5-98-164 shall require review by the Executive Director to determine if an amendment or a new permit would be required.

F. LOCAL COASTAL PROGRAM

Coastal Act Section 30600 states in part

(a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program that is in conformity with the provisions of Chapter 3.

On November 26, 1986, the Commission certified, with suggested modifications, the Land Use Plan portion of the City of Los Angeles, Playa Vista segment, Local Coastal Program. The certified LUP contains policies to guide the types, locations and intensity of future development in the Playa Vista area. The LUP designated most of Playa Vista for intense urban development, reserving 163 acres as wetland and additional area for other habitat purposes. The Land Use Plan portion included all roads proposed in this project although the proposed roads do not include all of the widening envisioned in the LUP, but only widening appropriate to the first stage of development. When the Commission certified the LUP for this area in 1986, this road was included as an eight-lane connector to the Marina Freeway. There is one other difference; the project does not bridge Lincoln Boulevard over Culver Boulevard but at this time retains the existing circa 1938 bridge over Lincoln.

This project involves less impact on resources and structures than the LUP. The Commission finds that the proposed roads are in locations identified by the certified LUP, and do not prevent development as envisioned in the plan from taking place.

The proposed development is consistent with the policies of the certified LUP. As proposed, the project will not adversely impact coastal resources or access. The Commission, therefore, finds that the proposed project will be consistent with the Chapter 3 policies of the Coastal Act and will not prejudice the ability of the City to prepare a Local Coastal Program implementation program.

G. CEQA

Section 13096 of the Commission's administrative regulations requires Commission approval of Coastal Development Permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effects, which the activity may have on the environment.

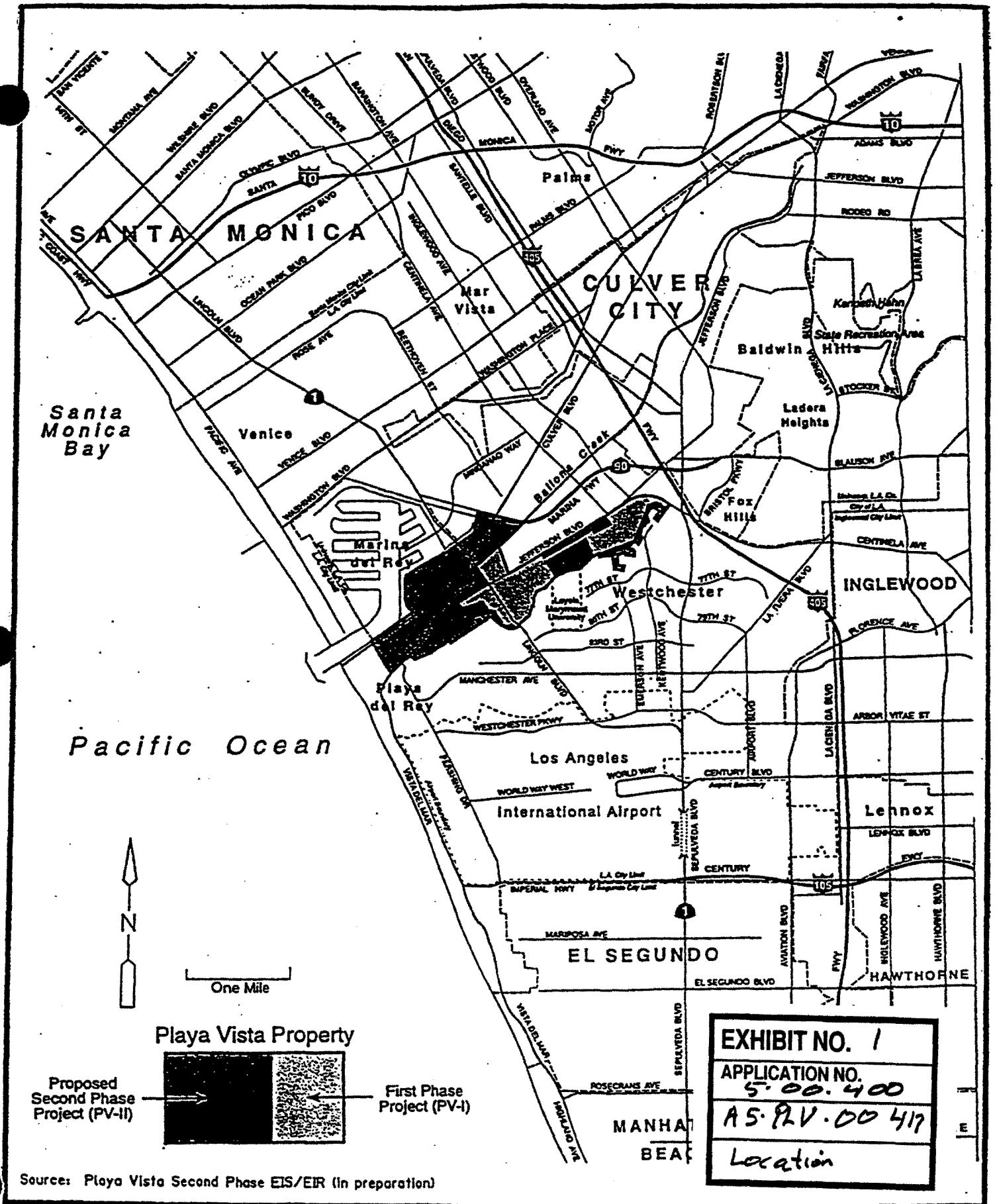
The Commission has determined that the proposed project, as conditioned, will not have any significant adverse impacts. As conditioned, there are no additional feasible alternatives or mitigation measures available, which would substantially lessen any significant adverse impact, which the activity may have on the environment. Therefore, as approved, the project is consistent with CEQA and the policies of the Coastal Act to conform to CEQA.

APPENDIX A

SUBSTANTIVE FILE DOCUMENTS

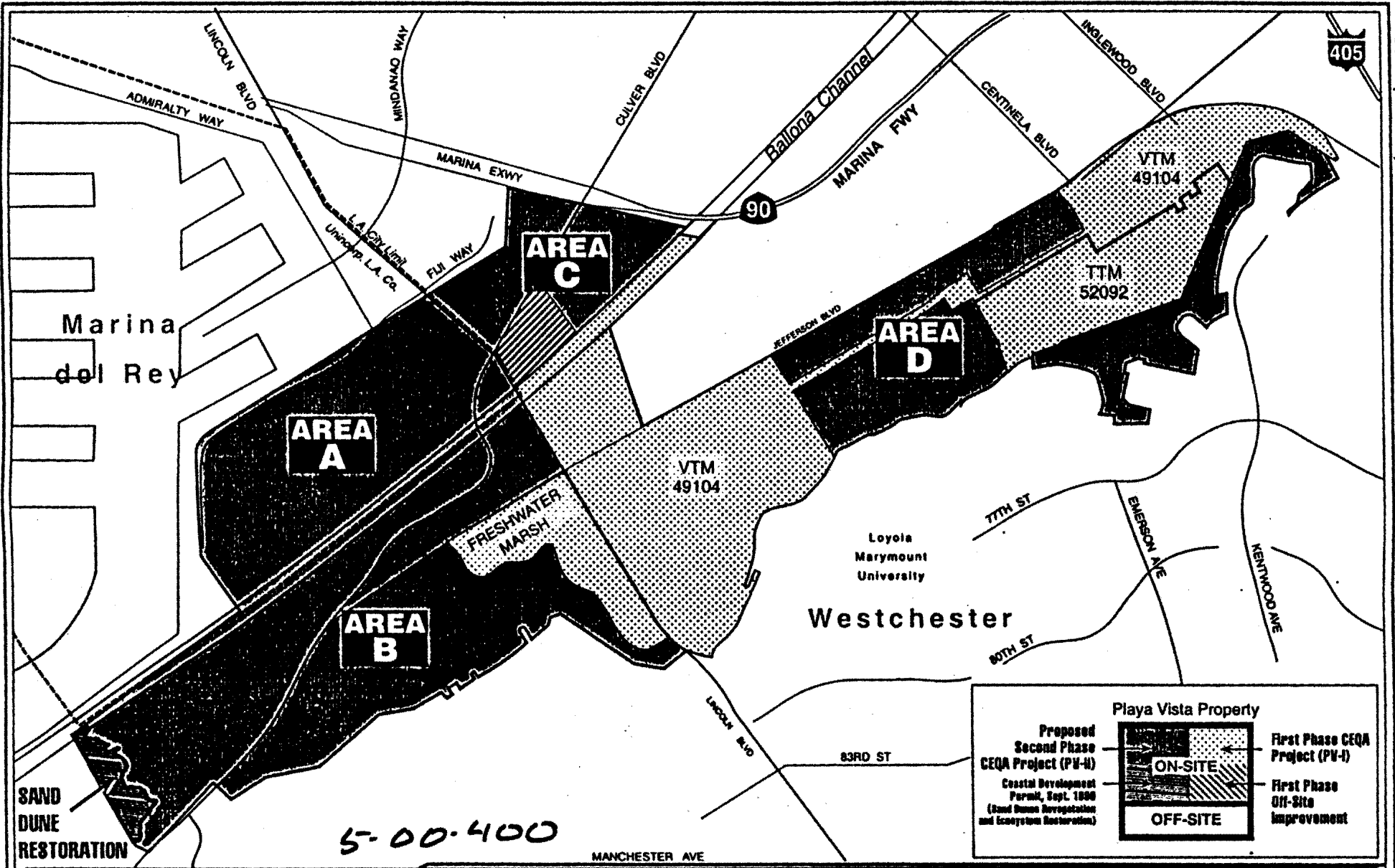
1. City of LA CDP No. 95-03 (August 1995), extended (October 1997), currently expired;
2. State CDP No. 5-95-148 (January 1996), extended (October 1997), currently expired;
3. City of LA CDP No. 00-3B (subject appeal)
4. Easement Agreement By and Between U.S. Trust Company of California, N.A. and Maguire Thomas Partners—Playa Vista, a California Limited Partnership, August 1990.
5. Security agreement regarding Area C between Kenneth Cory, State Controller and Summa Corporation, 1984, with first through fourth amendments.
6. Chief Deputy Controller to US Trust Company of California, October 30, 1998 correspondence and attached irrevocable offer to dedicate.
7. California Department of Transportation (CALTRANS), Encroachment Permit 798-6MC-0618; Encroachment Permit Rider 700-6RW-2956, November 8, 2000
8. First Phase Project for Playa Vista, Final EIR SCH # 90010510) –EIR No 90200-Sub (c)(CUZ)(CUB)
9. Mitigated Negative Declaration--Playa Vista Plant Site (MND# 950240 (SUB) & Addendum to the EIR for the first Phase Project for Playa Vista --August 1995
10. Los Angeles County Marina La Ballona certified LUP, October 1984.
11. City of Los Angeles Local Coastal Program, Certified Land Use Plan for Playa Vista 1987 (Section C4);
12. Coastal Development Permits: 5-91-463, 5-91-463A2, 5-91-463R, 5-95-148, permit waiver 5-00-139, 5-91-463, 5-98-164, A-5-PDR 99-130/5-99-151
13. City of Los Angeles Bureau of Engineering Staff Report, No. 95-03 –August 2, 1995
14. LADOT Inter-departmental correspondence --Amendment of Initial Traffic Assessment and Mitigation Letter dated September 16, 1992 --Revised May 24, 1993.
15. City of Los Angeles City Engineer, Memorandum Public Works review of ETI report titled "Subsurface Geo-chemical Assessment of Methane Gas Occurrences" for the Playa Vista project; file 1996-092; May 10, 2000
16. Victor T. Jones, Rufus J. LeBlanc, Jr., and Patrick N. Agostino, Exploration Technologies, Inc, Subsurface Geotechnical Assessment of Methane Gas Occurrences. Playa Vista First Phase Project. April 17, 2000. [Also referred to as the Jones Report or "the ETI report."]
17. Camp Dresser and McKee 2000, "Soil gas sampling and analysis for portions of Playa Vista Areas A and C near Culver Boulevard Widening Project" 4 page geologic letter report to Maria P Hoye dated 27 November, 2000 and signed by A. J. Skidmore and M. Zych (RG).
18. Mark Johnsson, Senior Geologist, California Coastal Commission, Memorandum: "Culver Boulevard Widening Project and Potential Soil Methane Hazards"
19. City of Los Angeles Department of Building and Safety, Memorandum of General distribution, #92, Methane Potential Hazard Zones, March 19, 1991.

20. City of Los Angeles, Office of the Chief Legislative Analyst, City Investigation of Potential Issues of Concern for Community Facilities District No 4, Playa Vista Development Project, March, 2001
21. California Department of Fish and Game, Memorandum: Extent of Wetlands in Playa Vista, December 1991."
22. California Coastal Commission, Memorandum: "Volume II Preliminary Working draft EIS/EIR Existing Conditions –Playa Vista March 5, 1998"
23. City of Los Angeles General Plan Palms, Mar Vista Del Rey District Plan, –Playa Vista Area C Specific Plan;
24. City of Los Angeles City Council: Conditions of Approval, Vesting Tentative Tract Map 49104 (As Revised December 8, 1995)
25. City of Los Angeles City Council: Conditions of Approval, Vesting Tentative Tract Map 52092 (December 8, 1995)
26. City of Los Angeles Tentative Tract Number 44668, Map and conditions of approval, May 4, 1987.
27. Agreement in Settlement in Litigation in the 1984 case of Friends of Ballona Wetlands, et al. v. the California Coastal Commission, et al. Case No. C525-826
28. Programmatic Agreement among the US Army Corps of Engineers, Los Angeles District, the Advisory Council on Historic Preservation and the California State Historic Preservation Officer, regarding the implementation of the Playa Vista Project, 1991.
29. Wetlands Action Network, Ballona Wetlands Land Trust and California Public Interest Research Group v. the United States Army Corps of Engineers.
30. Judge Lew, Federal District Court, June 1996, decision in Wetlands Action Network et al v United States Army Corps of Engineers.
31. Agreement Among U.S. Trust Company of California N. A, Maguire Thomas Partners – Playa Vista Area C a California limited partnership, and Maguire Thomas Partners-Playa Vista, a California limited partnership, September 28, 1990.
32. First Amendment to Agreement Among U.S. Trust Company of California N. A, Maguire Thomas Partners – Playa Vista Area C a California limited partnership, and Maguire Thomas Partners--Playa Vista, a California limited partnership, effective May 15, 1994.
33. Second Amendment to Agreement among U.S. Trust Company of California N. A, Maguire Thomas Partners – Playa Vista Area C a California limited partnership, and Maguire Thomas Partners-Playa Vista, a California limited partnership, entered into December 29, 1994.
34. Davis and Namson, Consulting Geologists, "An evaluation of the subsurface structure of the Playa Vista Project Site and Adjacent Area, Los Angeles, California", November 16, 2000.



Source: Playa Vista Second Phase EIS/EIR (in preparation)

Figure 1. Location of Playa Vista Development
(Modified after CDM, 1998)



A 5 PLV 00 417
 Exhibit 1 B
 B Area



Source: PCR Services Corporation, 1998

Figure 4
 Playa Vista
 Project Subareas

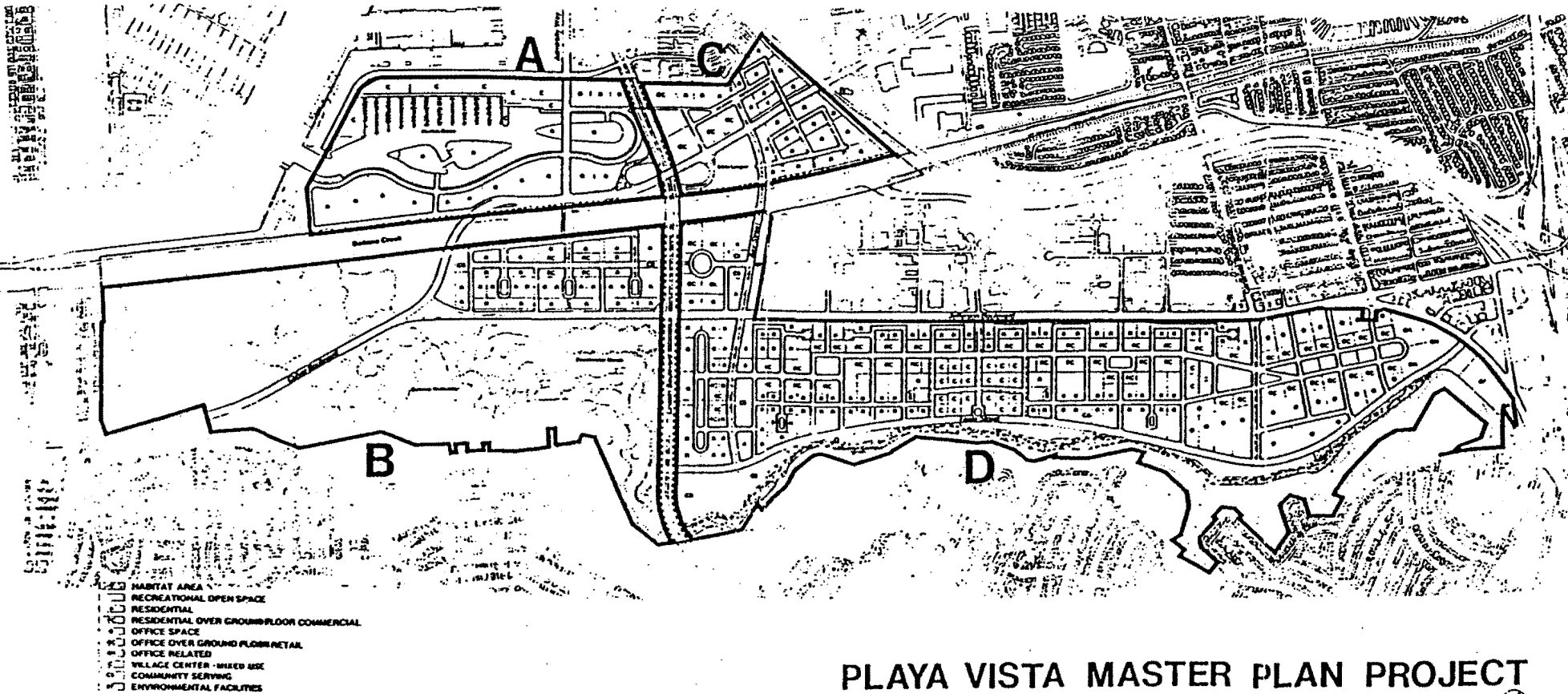


Area A - 139.1 acres

Residential 2,576 dwelling units
 Retail 75,000 square feet
 Office 125,000 square feet
 Hotel 450 rooms

Area C - 69.7 acres

Residential 2,032 dwelling units
 Office 900,000 square feet
 Retail 150,000 square feet



PLAYA VISTA MASTER PLAN PROJECT

Area B - 336.1 acres

Residential 1,800 dwelling units
 Retail 20,000 square feet

Area D - 412.2 acres

Residential 6,677 dwelling units
 Office 4,000,000 square feet
 Retail 350,000 square feet
 Hotel 600 rooms

*Exhibit
 1 p 3 (10)
 Master plan
 5-00400
 A 5. PLV 00 417*

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Lincoln Bl. & Jefferson Bl.
DOT Case No. CTC 91-025

5-00400
5. PLV 00417
Exhibit 4 p1
Excerpts
from EIR
Mitigation
measures

Date: May 13, 1993

To: Merryl Edelstein, Senior Planner
Attn: Dick Takase, City Planner
Department of City Planning
Haripal Vir

From: Haripal S. Vir, Senior Transportation Engineer
Department of Transportation

Subject: PLAYA VISTA PROJECT - PHASE I
AMENDMENT TO THE INITIAL TRAFFIC ASSESSMENT AND
MITIGATION LETTER DATED SEPTEMBER 16, 1992
EIR NO. 90-0200 (C) (CUB) (CUZ) (GPA) (SUB) (VAC) (ZC)

This letter amends our traffic assessment letter dated September 16, 1992. With the release of the project's Draft EIR in September 1992 and receipt of several comments on the proposed traffic mitigation measures, it became necessary to propose alternate mitigation measures at certain intersections. It should be noted that the Playa Vista Phase I mitigation measures adequately mitigated the traffic impacts as described in the Draft EIR. However, due to numerous requests for alternate access to the Marina Freeway and Caltrans' concerns regarding the proposed northbound "loop ramp" at the Jefferson Boulevard / I-405 freeway interchange, the Department of Transportation recommends alternate mitigation requirements which affect the following intersections/street segments:

- Lincoln Boulevard/Culver Boulevard interchange
- Bay Street bridge and connection to Culver Boulevard
- Culver Boulevard / Marina Freeway interchange
- Jefferson Boulevard between Lincoln Boulevard and San Diego Freeway
- Centinela Avenue between Marina Freeway and Jefferson Boulevard

The proposal is to construct a new ramp connection from northbound Lincoln Boulevard to eastbound Culver Boulevard and the Bay Street connection to Culver Boulevard (over Ballona Creek Channel) in order to provide a new access to Culver Boulevard and the Marina Freeway. This alternate mitigation will provide motorists on Lincoln Boulevard and Jefferson Boulevard with an alternate access route to the northbound San Diego Freeway via Culver Boulevard and Marina Freeway. These regional roadway improvements will

divert traffic and, thereby, relieve congestion on Jefferson Boulevard between Lincoln Boulevard and the San Diego Freeway (including Jefferson Boulevard at San Diego Freeway northbound ramps) and on Centinela Avenue between Jefferson Boulevard and Culver Boulevard.

In addition to Caltrans' comments, there were a number of additional concerns from local jurisdictions and municipalities including the City of Santa Monica. The City of Santa Monica requested that impacts within the City of Santa Monica be re-evaluated using an alternate traffic assignment. In the process of doing this, a new impact was identified at the intersection of Main Street and Rose Avenue in Los Angeles. The City of Santa Monica also requested that the intersection of Centinela Avenue and Short Avenue be evaluated. This resulted in an additional impact. The signalized intersection of Centinela/Washington immediately north of Short Avenue was also analyzed and found to be not impacted.

These two additional impacted intersections change the Phase I impacted intersections to a total of 54 intersections (including 50 within the City of Los Angeles, 3 in Los Angeles County, and 1 in Culver City) which can be fully or partially mitigated. These additional intersections are summarized as follows:

- Centinela Avenue and Short Avenue
- Main Street and Rose Avenue

Due to these alternate mitigation requirements and additional impacted intersections, our traffic assessment letter dated September 16, 1992 is revised as follows:

A. Paragraph on Page 3 of the September 16, 1992 Assessment Letter

Replace the paragraph on Page 3 of the letter that reads:

"Three of the remaining five intersections, as stated below, can be only partially mitigated and will yield a projected level of service (LOS) of C or better with the proposed mitigations. Generally, DOT considers any intersections functioning at LOS C or better to be at a good operating condition.

- Centinela Avenue and Mesmer Avenue

5-00400
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Exh. b. 14
p 3

- Jefferson Boulevard and Mesmer Avenue
- Jefferson Boulevard and San Diego Freeway southbound ramp"

with the following text:

"Four of the remaining five impacted intersections, as stated below, can be only partially mitigated; however the projected levels of service (LOS) will be C or better with the proposed mitigations. Generally, DOT considers any intersection functioning at LOS C or better to be at a good operating condition. Additionally, the mitigations provided by the project at other intersections in the vicinity of these four intersections would add capacity in excess of that needed by the project impact. DOT considers these mitigations sufficient to offset the residual significant impact at the following intersections:

- Centinela Avenue and Mesmer Avenue
- Centinela Avenue and Teale Street
- Jefferson Boulevard and Mesmer Avenue
- Jefferson Boulevard and San Diego Freeway southbound ramp"

and add the following text:

"With the alternate mitigation for Jefferson Boulevard/I-405 northbound ramps, four of the remaining five impacted intersections, as stated below, can be only partially mitigated and will yield a projected level of service (LOS) A or B as shown below with the proposed mitigations. Level of Service A is the highest quality of service a particular highway or intersection can provide. Level of Service B represents an intersection which operates well. Additionally, the mitigations provided by the project at other intersections in the vicinity of these two intersections would add capacity in excess of that needed by the project impact. DOT considers these mitigations sufficient to offset the residual significant impact at these intersections.

- Centinela Avenue and Mesmer Avenue (LOS A)
- Centinela Avenue and Teale Street (LOS A)
- Jefferson Boulevard and Mesmer Avenue (LOS B)
- Jefferson Boulevard and McConnell Avenue (LOS A)"

AS PLU DD 417 Exhibit 5
5-00400 p3

B. Attachment "E" - Phase I Impact and Mitigation Summary

The Phase I - Attachment "E" - Impact and Mitigation Summary (LOS Table), has been updated for several reasons. First of all, alternate mitigation requirements will result in rerouting of traffic; hence the volume to capacity (V/C) ratios and corresponding levels of service at a number of intersections have been revised. Secondly, the recently constructed LAX ATSAC system along the Lincoln Boulevard and Sepulveda Boulevard corridors improved the existing LOS at several intersections which in turn prompted changes to the LOS-Table. And finally, the two intersections discussed above were added to the LOS Table as newly impacted study intersections. Please see the revised Attachment "E". The list of affected intersections is as follows:

- ▶ Alla Rd. and Jefferson Blvd. (rerouting)
- ▶ Bali Wy. and Lincoln Blvd. (correction)
- ▶ Beethoven St. and Jefferson Blvd. (rerouting)
- ▶ Centinela Ave. and Culver Blvd. (rerouting)
- ▶ Centinela Ave. and Jefferson Blvd. (rerouting)
- ▶ Centinela Ave. and Marina Freeway EB Ramps (rerouting)
- ▶ Centinela Ave. and Marina Freeway WB Ramps (rerouting)
- ▶ Centinela Ave. and Short Ave. (addition)
- ▶ Century Blvd. and Sepulveda Blvd. (LAX ATSAC)
- ▶ Culver Blvd. and Marina Freeway EB Ramps (rerouting)
- ▶ Culver Blvd. and Marina Freeway WB Ramps (rerouting)
- ▶ Hughes Terrace and Lincoln Blvd. (LAX ATSAC)
- ▶ Jefferson Blvd. and McConnell Ave. (rerouting)
- ▶ Jefferson Blvd. and Mesmer Ave. (rerouting)
- ▶ Jefferson Blvd. and San Diego Freeway NB Ramps (rerouting)
- ▶ Jefferson Blvd. and San Diego Freeway SB Ramps (rerouting)
- ▶ Jefferson Blvd. and Westlawn Ave. (rerouting)
- ▶ Lincoln Blvd. and Loyola Blvd. (LAX ATSAC)
- ▶ Lincoln Blvd. and Manchester Ave. (LAX ATSAC)
- ▶ Lincoln Blvd. and Sepulveda Blvd. (LAX ATSAC)
- ▶ Main St. and Rose Ave. (addition)
- ▶ Manchester Ave. and Sepulveda Blvd. (LAX ATSAC)

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5-16-93

C. **Attachment "G" - Intersection Mitigation Descriptions Revised/Added/Deleted**

A revised supplemental traffic analysis (dated April, 1993) has been prepared by Barton Aschman Associates, the traffic consultants, to assess the benefits of the new connection to Culver Boulevard and the additional impacts of the diverted traffic resulting from the improvements proposed as an alternate to the Jefferson Boulevard "loop ramp" at San Diego Freeway. After a careful review of the study, DOT has determined that the project-related traffic impacts can be adequately mitigated with the following changes to the mitigation requirements stated in our letter dated September 16, 1992. Attachment "G" of the September 16, 1992 Assessment Letter is amended as stated below:

Additional Required Physical Roadway and Intersection Improvements - The following improvements should be added to the "description of physical roadway and intersection improvements":

1. **Bay Street Bridge (additional) - (see attached Drawings "BB-1", "BB-2" signed May 6, 1993)**
 - a. Construct the Bay Street Bridge to City standards over the Ballona Creek Channel with an 80-foot roadway and two 10-foot (minimum) sidewalks to connect north of Jefferson Boulevard and Culver Boulevard.
 - b. Stripe Bay Street between Culver Boulevard and "B" Street to provide two through lanes in both the northbound and southbound directions.
 - c. Bike lanes should be provided from Ballona Creek Bridge southerly. Construct ingress and egress to provide access to the existing bike path along the north levee of the Ballona Creek.

This improvement would require approval and coordination of the Los Angeles County Flood Control and the Army Corps of Engineers.

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Exhibit 4
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2. Bay Street and Culver Boulevard (additional) - (see attached Drawing "AA-1", "AA-2" signed May 6, 1993)

- a. Dedicate property and improve both sides of Culver Boulevard from Lincoln Boulevard to a point approximately 640 feet easterly of Bay Street centerline to provide up to a 74-foot roadway within a right-of-way varying between 92 feet and 94 feet.
- b. Stripe Culver Boulevard to provide one through lane and one shared through/right-turn lane in the eastbound direction and two left-turn only lanes and two through lanes in the westbound direction.
- c. Stripe Bay Street to provide two through lanes in the southbound direction and one shared left-turn/right-turn lane and one right-turn only lane in the northbound direction.
- d. Concurrent with LADOT's determination as to warrants for a traffic signal, the applicant is required to fund the design and installation of a traffic signal at this intersection.

3. Centinela Avenue and Short Avenue (additional)

The proposed project can mitigate the project-related traffic impacts at this intersection by contributing \$120,000 to a project in the City's Five Year Capital Improvement Program proposed at this location.



4. Culver Boulevard and Lincoln Boulevard Interchange, "south-east quadrant" (additional) - (see attached Drawing "AA-1" signed May 6, 1993)

- a. Dedicate, construct, and realign the existing ramp to provide a new interchange in the south-east quadrant of Lincoln Boulevard and Culver Boulevard to provide two separate roadways connecting (1) the northbound Lincoln Boulevard to the eastbound Culver Boulevard and, (2) the eastbound westbound Culver Boulevard to the northbound Lincoln Boulevard.

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Exhibit 4 PG
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- b. Restripe Lincoln Boulevard at the interchange turn-off to provide three through lanes and one right turn only lane in the northbound direction.
- c. Widen a portion of the Lincoln Boulevard bridge over Ballona Creek on the east side to accommodate the northbound right-turn only lane at the new interchange turn-off.
- d. Restripe Culver Boulevard at the interchange to provide one left-turn only lane and one through lane in the westbound direction.
- e. Concurrent with LADOT's determination as to warrants for a traffic signal, the applicant is required to fund the design and installation of a traffic signal at this intersection.

This improvement would require the coordination and approval of the County of Los Angeles, Caltrans, Los Angeles County Flood Control, and the Army Corps of Engineers.

5. Culver Boulevard and Marina Freeway (Route 90) Grade Separation (additional) - (see attached Drawings "AA-2", "AA-3", and "AA-4" signed May 6, 1993)

Design a complete grade separation at the Culver/Route 90 interchange and complete the construction as described below:

- a. Westbound Grade Separation - Guarantee the westbound portion prior to the issuance of any certificate of occupancy of office space in sub-phase 1F and complete construction of the westbound portion of the grade separation between Ballona Creek and a point approximately 1400 feet westerly of the Culver Boulevard centerline before the issuance of any certificate of occupancy beyond the initial 200,000 square feet of office space in the sub-phase 1F of Phase I Playa Vista.
- b. Eastbound Grade Separation - Complete the eastbound portion of the grade separation in sequence with the westbound portion if adequate funding is provided by other sources including the Playa Vista Master

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Plan, other developments, or public funding sources. This portion should be completed within 3 years of the availability of funding and approval of permits unless otherwise conditioned in future Playa Vista Master Plan conditions beyond Phase I.

The Marina Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

6. Main Street and Rose Avenue (additional) - (see attached Drawing "CC-1" signed May 6, 1993)
- a. Widen the east side of Main Street by 7 feet between Rose Avenue and the alley located approximately 180 feet southerly of the Rose Avenue centerline to provide a 34-foot half roadway and a sidewalk of varying between 7 feet and 9 feet within the existing half right-of-way.
 - b. Restripe Main Street to provide one left-turn only lane, one through lane and one shared through/right-turn lane in the northbound and southbound directions.
 - c. Widen the south side of Rose Avenue by 5 feet adjacent to the island/parking lot west of Main Street to provide a 25-foot half roadway and a 10-foot sidewalk within the existing 35-foot half right-of-way.
 - d. Restripe Rose Avenue to provide one left-turn only lane, one through lane and one right-turn only lane in the eastbound direction.
 - e. Restripe the City-owned off-street parking lot on the southwest corner of the intersection. Also, relocate the parking meters (if necessary) and set-back the chain-linked fence (northerly boundary) further south.
 - f. This improvement in street capacity requires on-street parking prohibition at all times on the west side of Main Street between a point approximately 110 feet south of Rose Avenue and a point approximately 180 feet southerly of Rose Avenue. This prohibition

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System.

4. Centinela Avenue widening between the Marina Freeway (SR 90) and Jefferson Boulevard - Pages 6, 7: item 5: Option "B" (see attached Drawings "C-1(1)" through "C-3(1)")

Delete Option "A" entries. Substitute Option "B" as follows:

Projected-related traffic impacts on Centinela Avenue between Jefferson Boulevard and the Marina Freeway can be mitigated by providing six continuous through lanes in both the northbound and southbound directions during the a.m. and p.m. peak periods. This segment of Centinela Avenue is under the jurisdiction of the County of Los Angeles and any improvements must be coordinated with and approved by the County of Los Angeles.

- a. These improvements require on-street parking restrictions on both the east and west side of Centinela Avenue between Jefferson Boulevard and the Marina Freeway. These restrictions will cause parking impacts and reduce on-street parking by 86 spaces during both the a.m. and p.m. peak periods.
- b. In addition, access to Juniette Street at Centinela Avenue shall be restricted to right-turn inbound and outbound in both the eastbound and westbound directions. This will cause operational traffic impacts at Centinela Avenue and Juniette Street.
5. Culver Blvd and the Marina Freeway (SR 90) eastbound ramps (revised) - page 13: item 16 - (see attached Drawing "AA-2" and "AA-3" signed May 6, 1993)
- a. Dedicate property along the project frontage on both sides of Culver Boulevard between the southerly property line of the 90-foot railroad right-of-way and a point approximately 480 feet southerly of the Marina Freeway eastbound ramp centerline to provide up to 106-foot right-of-way. Widen both the east and west sides of Culver Boulevard from the Marina Freeway Eastbound ramps to a point approximately

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Exhibit 4 p 9

480 feet southerly of the Marina Freeway eastbound ramp centerline to provide up to 86-foot roadway, a 10-foot sidewalk on the south side and 10-foot dirt shoulder on the north side within a 106-foot right-of-way.

- b. Widen both the north and south sides of the Marina Freeway eastbound roadway from Culver Boulevard to a point approximately 680 feet easterly of the Culver Boulevard centerline to provide up to a 48-foot roadway. Restripe the roadway for three lanes in the eastbound direction.
- c. Restripe Culver Boulevard to provide two through lanes and two right-turn only lanes in the northbound direction and one left turn only lane and three through lanes in the southbound direction.
- d. Relocate and modify signal equipment as required.

The Marina Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

6. Culver Boulevard and the Marina Freeway (SR 90) westbound ramps (revised)
- page 13, 14: item 17 - (see attached Drawing "AA-3" signed May 6, 1993)

- a. Widen both sides of the Marina Freeway westbound off-ramp from Culver Boulevard to a point approximately 420 feet easterly of the Culver Boulevard centerline to provide up to a 60-foot roadway.
- b. Widen the east side of Culver Boulevard by 2 feet from the Marina Freeway westbound roadway to a point approximately 340 feet northerly of the Marina Freeway westbound roadway centerline to provide a 42-foot half roadway and an 8-foot sidewalk within the existing 50-foot half right-of-way.
- c. Relocate and modify signal equipment as required.

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The Marina Freeway is under the jurisdiction of Caltrans and any improvements must be coordinated with and approved by Caltrans.

7. Jefferson Boulevard and McConnell Avenue (deleted) - (see September 16, 1992 Assessment Letter, Attachment "G" page 18, item 26)

Delete the description of the intersection improvement that reads:

- "a. Dedicate 14 feet of property and widen the south side of Jefferson Boulevard by 12 feet along the project frontage from Beethoven Street to Westlawn Avenue to provide a 54-foot half roadway within a 64-foot half right-of-way.
 - b. Remove the raised median islands on Jefferson Boulevard between Beethoven Street and Westlawn Avenue. Relocate and modify traffic signal equipment as required.
 - c. Restripe Jefferson Boulevard to provide one left-turn only lane and four through lanes in the eastbound direction and three through lanes and one shared through/right-turn lane in the westbound direction and midblock two-way left-turn lanes between Beethoven Street and Westlawn Avenue."
8. Jefferson Boulevard and Westlawn Avenue (deleted) - (see September 16, 1992 Assessment Letter, Attachment "G" page 20, item 30)

Delete the description of the intersection improvement that reads:

- "a. Dedicate 14 feet of property and widen the south side of Jefferson Boulevard by 12 feet along the project frontage from McConnell Avenue to a point approximately 800 feet easterly of the Westlawn Avenue centerline to provide a 54-foot half roadway within a 64-foot half right-of-way.
- b. Remove the raised median islands on Jefferson Boulevard between McConnell Avenue and Centinela Avenue. Relocate

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and modify traffic signal equipment as required.

- c. Restripe Jefferson Boulevard to provide one left-turn only lane and four through lanes in the eastbound direction and three through lanes and one shared through/right-turn lane in the westbound direction and midblock two-way left-turn lanes between McConnell Avenue and Centinela Avenue."

9. Jefferson Boulevard and the San Diego Freeway (I-405) northbound ramps (revised) - page 19; item 28; (see attached Drawing "A-11" signed May 6, 1993)

- a. Widen the north side of Jefferson Boulevard up to 8 feet from the San Diego Freeway northbound on-ramp to a point approximately 180 feet easterly of the on-ramp centerline to provide up to a 52-foot half roadway and a 10-foot sidewalk. This widening may require the construction of a retaining wall on the north side of Jefferson Boulevard. Relocate, modify, or remove traffic signal equipment as required. The east leg of the intersection is under the jurisdiction of Culver City and any improvements must be coordinated with and approved by Culver City.
- b. Widen both the east and west sides of the San Diego Freeway northbound on-ramp up to 6 feet from Jefferson Boulevard to a point approximately 400 feet northerly of the Jefferson Boulevard centerline to provide up to a 40-foot roadway. This widening may require the construction of a retaining wall on the east and/or west side(s) of the San Diego Freeway northbound on-ramp. Relocate, modify, or remove ramp metering equipment as required.
- c. Restripe the San Diego Freeway northbound on-ramp to provide three through lanes.
- d. Modify raised median island on Jefferson Boulevard (west leg) to facilitate northbound left turns from the San Diego Freeway to westbound Jefferson Boulevard.

Exhibit 4
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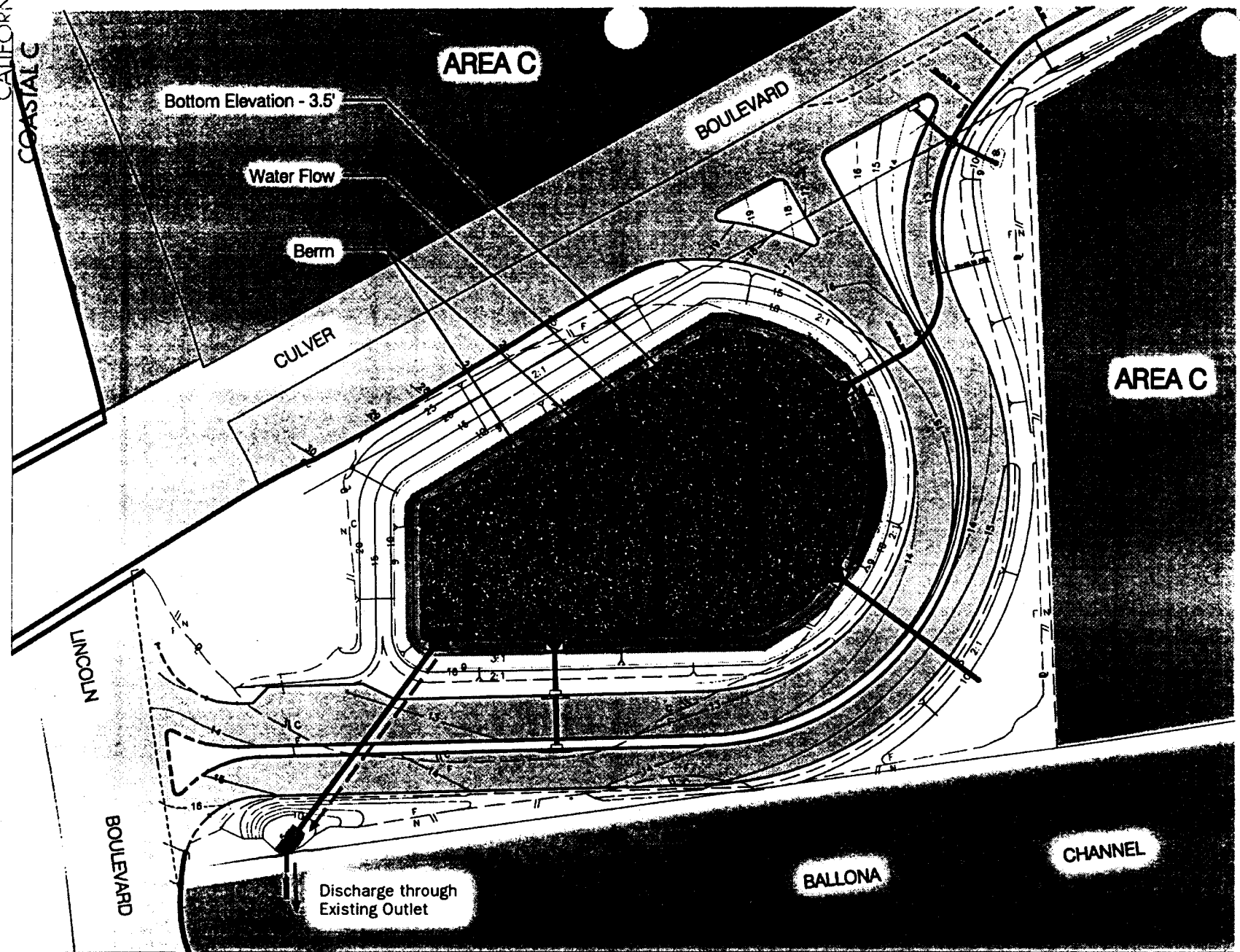


EXHIBIT 2 - WATER QUALITY BASIN SCHEMATIC PLAN

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Exhibit 5
RAMS & PLANS

KAKU ASSOCIATES

A Corporation

Transportation Planning

Traffic Engineering

Parking Studies

RECEIVED
APR 27 2000**MEMORANDUM**

TO: Tom Paradise, PCC
CC: Tim Connors, PCC
Catherine Tyrrell, PCC

FROM: Srinath Raju
Pat Gibson

SUBJECT: Culver Boulevard Ramp Improvements at Lincoln Boulevard

DATE: April 25, 2000

REF: 1062.27

This memorandum provides a brief clarification and discussion of the various benefits that the ramp improvements at Lincoln Boulevard and Culver Boulevard junction would provide. These benefits include those that the existing traffic would experience and also those that the projected future traffic would obtain.

Key benefits that both existing and future traffic would experience as a result of the construction of the Lincoln Boulevard NB on/off-ramp at Culver Boulevard include:

- Improved access and circulation to the Coastal zone areas
- Enhanced traffic circulation along regional facilities like Lincoln Boulevard, Mindanao Way, Jefferson Boulevard and Centinela Avenue
- Enhanced traffic circulation and access to/from Playa Vista Phase I project
- Improvement of the currently existing sub-standard, directional ramp to standard, full access ramps from Culver Boulevard to NB Lincoln Boulevard

A brief discussion of each of the above improvements follows.

Coastal Access Improvement: This improvement provides a connection from northbound Lincoln Boulevard to both east- and westbound Culver Boulevard thereby improving access to the Coastal zone areas adjacent to Culver Boulevard. Currently existing uses as well as future uses in the Coastal zone will be benefited by this improvement consisting of both a NB Lincoln Boulevard to EB and WB Culver Boulevard connection as well as a WB Culver Boulevard to NB Lincoln Boulevard traffic movement. Therefore, an additional circulation alternative to and from the uses within the Coastal zone area will now be made available by this proposed ramp improvement. Also, in the near future, Caltrans will be providing grade-separated interchange at the SR 90 and Culver Boulevard junction. This improvement would greatly improve access to the SR 90 to and from NB Lincoln Boulevard as well as the uses within the Coastal zone areas.

1453 Third Street, Suite 400

Santa Monica, CA 90401

(310) 458-9916 Fax (310) 394-7663

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Exhibit 6
PI
consultant report
traffic

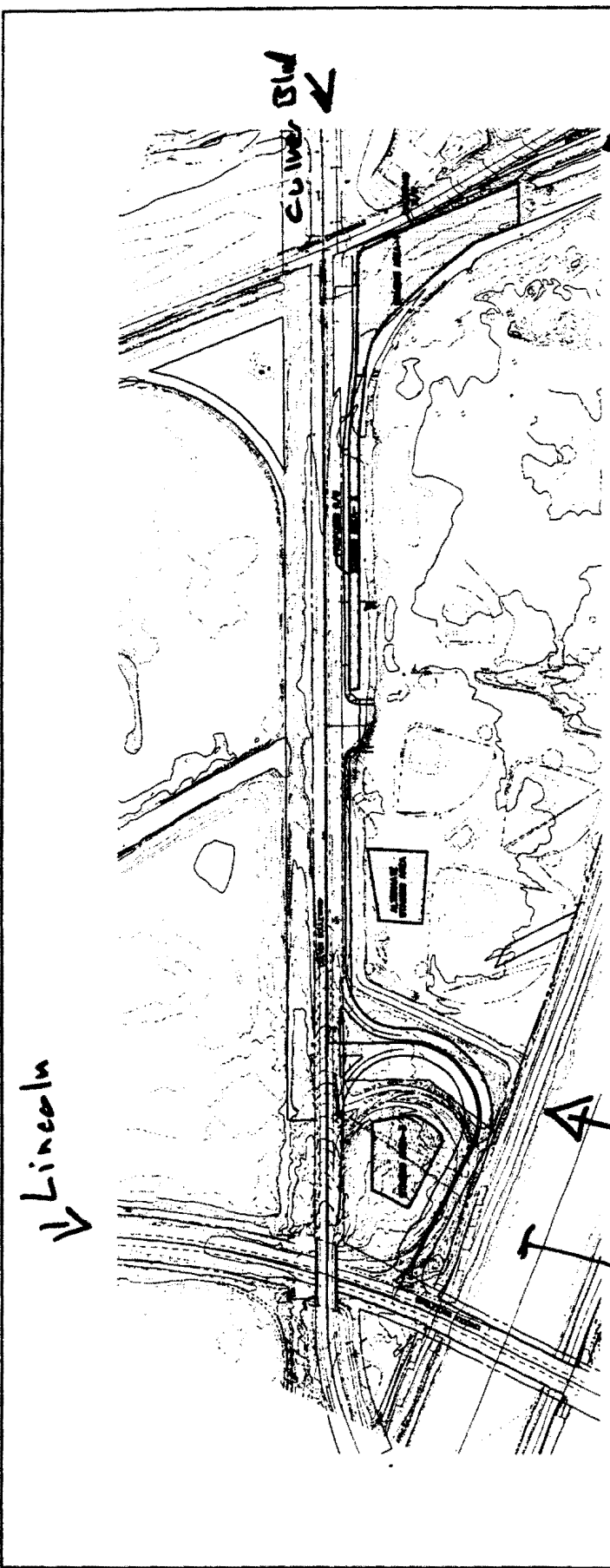
Traffic Flow Enhancement along various regional facilities: Numerous roadways including Lincoln Boulevard, Mindanao Way, Jefferson Boulevard and Centinela Avenue would experience certain traffic flow enhancement benefits as a result of reduced turning movements at various critical intersections along the way to the SR 90 freeway. The Lincoln/Mindanao intersection would notice a reduction of approximately 150 northbound right turns during the morning peak hour since they would now utilize the new Lincoln / Culver connection. Further, the Lincoln / Jefferson intersection would also notice a reduction of approximately 200 northbound right turns on their way to the SR 90 freeway. Approximately 100 to 150 peak hour EB left turning vehicles at the Centinela Avenue / Jefferson Boulevard intersection could appear at the new ramp connection and travel along the SR 90 freeway. The new NB Lincoln Boulevard to EB Culver Boulevard to the SR 90 freeway route will provide an attractive path choice to numerous other SR 90 access route choices in the area. This alternative will draw existing traffic (approximately 350 to 400 vehicles in the peak periods) from those local path choices thereby reducing traffic on various segments of Lincoln Boulevard, Mindanao Way, Jefferson Boulevard and Centinela Avenue roadways. The potential local path choices that would experience indirect benefits would include the NB Lincoln to Mindanao Way to SR 90 freeway; the NB Lincoln to Jefferson Boulevard to Centinela Avenue to SR 90 freeway, and in the future with the Playa Vista Phase I Project, the NB Lincoln to Playa Vista Drive to Culver Boulevard to SR 90 freeway.

Access Enhancement to Playa Vista Phase I Project: This improvement would offer an additional route to get to the SR 90 freeway from the Playa Vista Phase I residential component, particularly the homes planned to be built in the northeast quadrant of the Lincoln Boulevard / Jefferson Boulevard intersection. The other route would be offered when the office component on the west end of Playa Vista Phase I Project is built – that is the Playa Vista Drive to Culver Boulevard to SR 90 route.

Ramp Improvement to Standards: Currently, a sub-standard directional ramp that allows only an eastbound Culver Boulevard to northbound Lincoln Boulevard exists. This ramp is used extensively during the AM peak periods by the traffic from the Playa-del-Rey subdivisions and to a certain extent from the South Bay areas to the Santa Monica and West Los Angeles areas. The proposed improvement will provide a full eastbound and westbound Culver Boulevard to northbound Lincoln Boulevard interchange to standards thereby significantly improving safety and ease of operation.

Summarizing, this improvement would improve traffic circulation and access both directly and indirectly as detailed in the discussion above. If you have any questions or comments, please do not hesitate to call us at 310-458-9916.

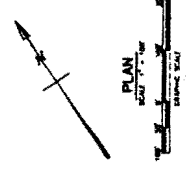
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Consultant report
Exhibit 6
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Project Staging
 Tamps
 Exhibit 7
 Plaza Lists
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FIGURE 2

PSOMAS <small>1144 Red Street, Richmond, Va. 704 1144 Lee Avenue, O.A. 7044-1172 (804) 281-3100 (fax) 281-3177 (fax)</small>	CULVER BOULEVARD, IA IMPROVEMENT CONSTRUCTION STAGING AREA	
	06/11/98	SCALE: 1"=100' 11000003.83



KAKU ASSOCIATES

A Corporation

Transportation Planning

Traffic Engineering

Parking Studies

MEMORANDUM

TO: Catherine Tyrell, PCC
CC: Marc Huffman, PCC

FROM: Srinath Raju

SUBJECT: Clarification of Playa Vista First Phase Project Traffic Estimates

DATE: November 2, 2000 REF: 1062.54

PLAYA VISTA
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This memorandum briefly summarizes the traffic estimates prepared for the Playa Vista First Phase Project (including the assumptions utilized and the methodology employed) along the Lincoln Boulevard and Culver Boulevard travel corridors immediately adjacent to the site and compares the same to current existing (1998) traffic volume counts conducted at the same locations. The use of these travel estimates in the planning of transportation facility improvements in this area is also discussed in this memorandum.

Attachment A summarizes the traffic volume estimates from Playa Vista First Phase Project Environmental Impact Report document along the subject facilities and provides a comparison of the same with actual 1998 ground counts at the same locations. The Playa Vista First Phase EIR Future (1997) without Project traffic forecasts included the following two components of cumulative growth:

1. An ambient growth factor (1.5% per year) from Base 1990 conditions to Future 1997 conditions, and
2. Growth in traffic due to background related projects in the vicinity of the project site. A total of 188 different development projects were included in the related projects list, of which some have occurred already, some are planned for in the near future and some will never get developed. Examples of the background related projects included in the Playa Vista First Phase Project EIR are LAX Airport Expansion (20 MAP), LAX North-side, Continental City Development and Hughes Entertainment Center. The total Related Projects within the study area included up to 22 million square feet of office space, 6,800 residential units, up to 2.7 million square feet of retail space and up to 10,000 hotel rooms

The future travel forecasts including the Playa Vista First Phase Project traffic was utilized to estimate the roadway system requirements and the deficiencies in the existing system. The roadway improvements planned along Lincoln Boulevard, Culver Boulevard, SR 90, Jefferson Boulevard, Sepulveda Boulevard and Centinela Avenue in the vicinity of the Playa Vista Project all included accommodating the increased traffic due to cumulative growth (including ambient growth

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Exhibit 8

Consultant Report
Report traffic levels

November 2, 2000

Page 2

and background related projects like LAX expansion, LAX North-side, Hughes Entertainment Center, Loyola Marymount Expansion and Continental City Development) and growth due to the Playa Vista Project.

From Attachment A, the following observations and inferences can be made:

1. A lot of the anticipated cumulative growth referred to above and included in the estimation of future traffic conditions in the Playa Vista First Phase Project EIR has not yet occurred in the region. This can be observed by comparing the existing 1998 ground counts with the future base (1997) traffic volumes along Lincoln Boulevard in the vicinity of the project site estimated by the Playa Vista First Phase Project EIR. The future base traffic volumes are approximately 500 to 1000 vehicles per hour per direction higher than the existing 1998 ground counts. Along Culver Boulevard, the existing ground counts seem to vary from being equal to what was predicted at one or two locations to approximately 800 to 1000 vehicles less than what was predicted in the Playa Vista First Phase Project EIR. Overall roadway traffic flows indicate that along both Lincoln Boulevard and Culver Boulevard during both AM and PM peak periods, traffic volumes are currently lower (per ground counts from 1998) than the predicted Playa Vista First Phase Project EIR's Future Year (1997) cumulative base traffic flows.
2. A comparison of the intersection operations at the various critical intersections along Lincoln Boulevard and Culver Boulevard indicate that the 1998 ground count based volume-to-capacity (V/C) ratios and consequently, the levels of service are much better than the predicted future year 1997 cumulative base V/C ratios and levels of service, respectively, at the same locations, from the Playa Vista First Phase Project EIR. This also indicates that the high level of cumulative growth predicted in the Playa Vista First Phase Project EIR has not occurred.
3. In the design of the various transportation facilities' improvements, the Playa Vista First Phase Project EIR used conservative traffic estimates including all the potential cumulative growth in the region. A good portion of this growth has not yet occurred but the design of the facilities improvements contemplated in the Playa Vista First Phase Project's EIR anticipated this land use growth and accommodated the same.

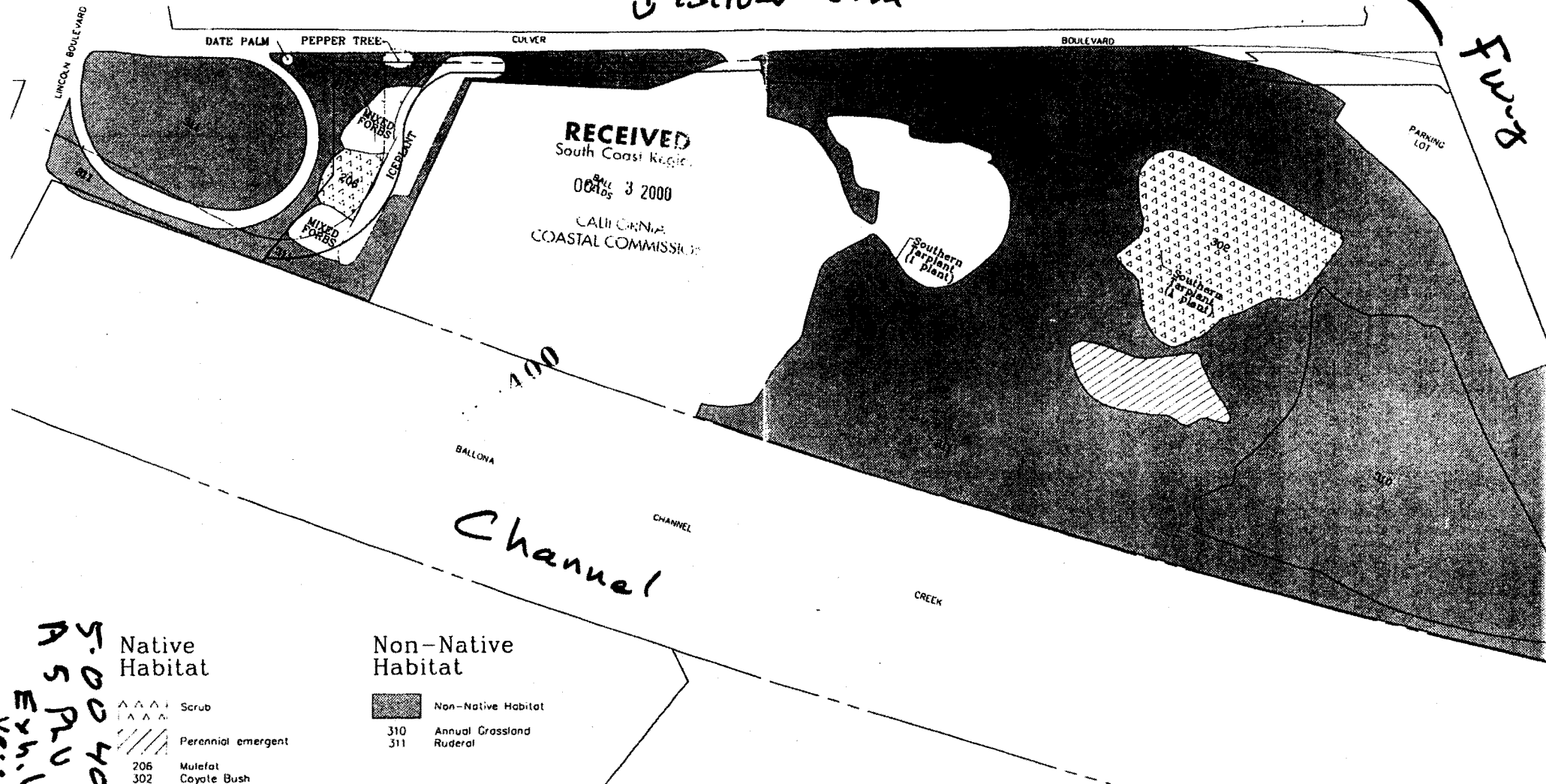
If you have any questions or comments, please do not hesitate to call me at 310-458-9916.

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Project

↓ Culver Blvd

Facts



Native Habitat

- ▲▲▲▲ Scrub
- ▨▨▨▨ Perennial emergent
- 206 Mulefat
- 302 Coyote Bush

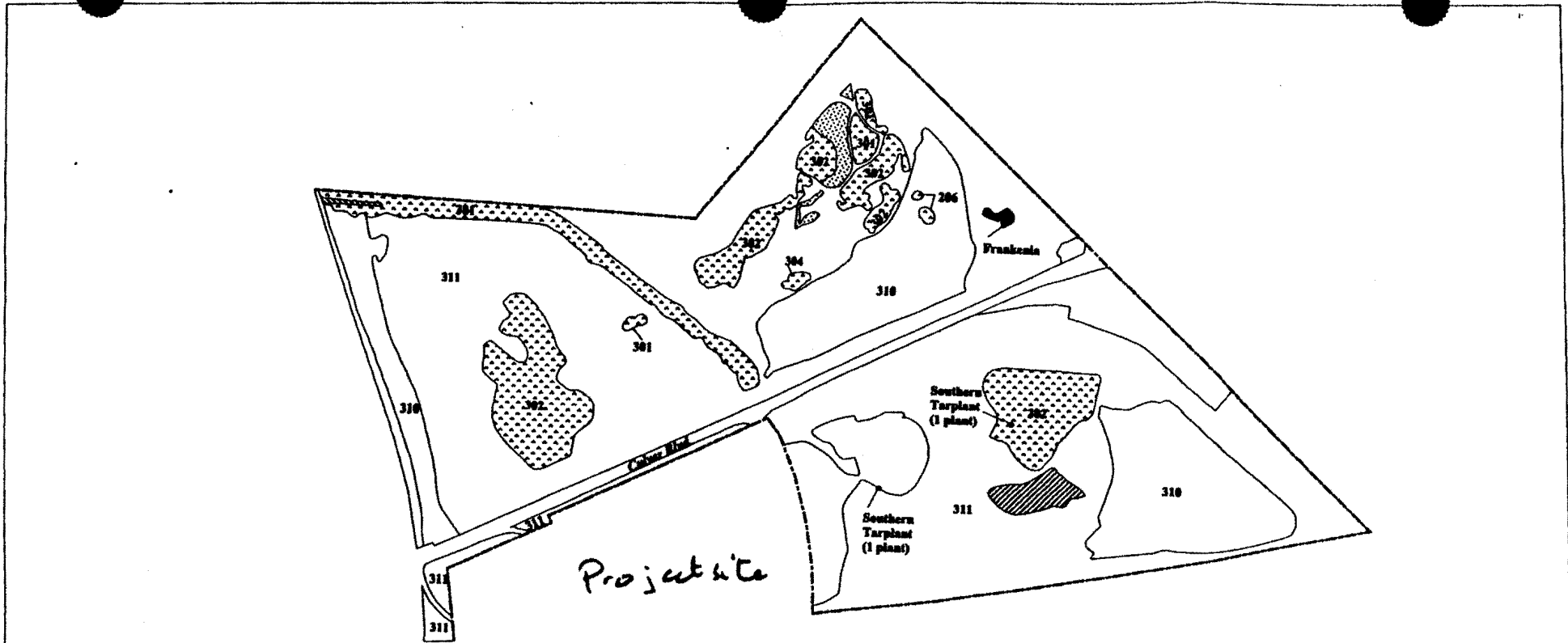
Non-Native Habitat

- Non-Native Habitat
- 310 Annual Grassland
- 311 Ruderal

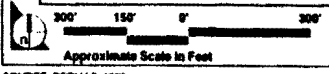
EXISTING VEGETATION MAP

EXHIBIT -

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Exhibit 9
Vegetation survey



LEGEND			
	Scrub		Pickleweed-Dominated Flat
	Non-native Habitat		Trails, Cleared or Developed
	206-Mulefat		310-Annual Grassland
	301-Saltbush		311-Ruderal
	302-Coyote Bush		314-Ruderal w/Mulefat
	304-Coastal Sagebrush		320-Other Exotics
	Perennial Emergent		Phase 2 Boundary
	Seasonal Emergent		



SOURCE: PSOMAS, 1998

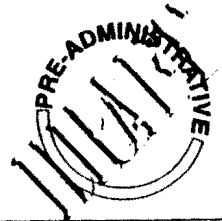


FIGURE II.D.6C

Vegetation of Area C

Playa Vista EIS/EIR Affected Environment

Vegetation Survey Area C

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Exh. h. t 10

Memorandum

To : Mr. Jim Burns
 Assistant Director
 California Coastal Commission
 45 Fremont Street, Suite 2000
 San Francisco, California

Date : December 20, 1991

RECEIVED
 DEC 24 1991
 CALIFORNIA
 COASTAL COMM

EXHIBIT NO. 11
APPLICATION NO. 5-91-463
A 5 00 PLV 417
Wetland letter Fish & Game

From : Department of Fish and Game

Subject : Ballona Wetlands Acreage Determination Contained in the
 Department of Fish and Game's September 12, 1991 Memorandum to
 the Fish and Game Commission

The Department has provided the Coastal Commission with information regarding the extent and condition of wetland and other environmentally sensitive habitat areas within the Playa Vista Land Use Planning area for the past ten years. Our determinations in this regard were used by the Coastal Commission in certifying the Playa Vista Land Use Plan.

It seems that the primary, present, controversy is limited to the extent of wetland acreage north of the Ballona Creek Channel. It is important to recognize that this controversy existed at the time we prepared our September 12, 1991 memorandum to the Commission regarding approximately 52-acre "Freshwater Marsh/Open-Water Wetland-Riparian Area Project". This project was before the Commission at that time (Application Number 5-91-463). We provided the Commission with a map indicating the extent of pickleweed-dominated saltmarsh and other vegetative communities on the large fill area north of Ballona Creek Channel. Department personnel ground-truthed the accuracy of the vegetation map prior to its transmittal to the Commission, and we found it to be highly accurate. We also provided the Commission with a table indicating precisely quantified acreage for each of 28 distinct, independently-measured subareas of the pickleweed-dominated saltmarsh wetland type on the fill area. This totaled 19.95 acres which we rounded off to 20 acres for the purposes of discussion in the text of our 7-page memorandum.

We also mapped 17.66 acres of patchy pickleweed distributed within what was characterized as an upland vegetative association (page 2 of our September 1991 memorandum). Most of this 17.66 acres was dominated by pickleweed prior to the onset of the present drought cycle. Consequently, we found it likely that a portion of these 17.66 acres would again be dominated by pickleweed given a return of normal rainfall.

Lastly, we determined that portions of the 4.78 acres of saltflat were wetlands by virtue of periodic inundation which we

Mr. Jim Burns
December 20, 1991
Page Two

observed several years ago but that was at the time of the field inspection of Area A, prior to transmittal of our September 12, 1991 memorandum, these saltflats did not function as wetlands.

Using the observation discussed in the presiding two paragraphs, and applying the wetland definition contained in the document entitled "Classification of Wetlands and Deepwater Habitats of the United States" (Cowardin, et al., 1979), we informed the Commission that not less than 20 acres of the Area A presently functioned as wetland by virtue of dominance by obligate hydrophytic vegetation even after five years of drought. Since our past wetland determinations on Area A included the acknowledgement of the presence of 2.5 acres of saltflat which functioned as wetland by virtue of periodic inundation we found it probable, and continue to find it probable, that 2.5 acres of saltflat would again function as wetland given a return of normal rainfall. We formerly identified 37.5 acres of wetland in Area A, and we continue to believe that, under normal rainfall conditions, 37.5 acres would again function as wetland. These 37.5 acres of wetland may be generally characterized as being composed of the 20 acres of existing pickleweed-dominated saltmarsh, 2.5 acres of saltflat, and 15 acres of recovered saltmarsh from the existing 17.66 acres of patchy pickleweed community. We reiterate for clarity that only the 20 acres of pickleweed-dominated saltmarsh presently functions as wetland.

We do not agree with the opinion which holds that the pickleweed-dominated flats are simply an indication of the saline nature of the original dredge spoils. In point of fact, there are several plant species in Area A which are very tolerant of saline soil conditions. Among these are salt grass (Distichlis spicata) and Atriplex spp. Further, Salicornia grows quite well in nonsaline soils. The patterns of vegetative dominance in Area A are based upon essentially two factors, soil salinity and substrate saturation. Where we have both saline soils and low-elevation (and therefore increased degree of substrate saturation) we find that competitive advantage is conferred upon pickleweed. In areas with low soil salinities at higher elevation (and therefore relatively little soil saturation) typical ruderal species predominate. In areas of similar elevation, and elevated soil salinities, we find Atriplex and Baccharis. In areas where soil saturation levels are especially high and the substrate is subject to inundation and/or has been highly compacted through time, we have saltflats which typically are too salty for pickleweed and at times may be too wet, too long to support pickleweed. Lastly there are areas, essentially the 17.66 acres of patchy pickleweed designated on the map we appended to our September 12, 1991 memorandum, where salinities and saturation are in a state of flux and in which after 5 years

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Exhibit 11 p2

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Wetland delineation

Mr. Jim Burns
December 20, 1991
Page Three

of drought pickleweed is being out-competed by upland indicator species.

Additionally, we do not necessarily agree that substrate salinities in Area A are markedly different now than they were a decade ago. One has only to observe the pickleweed-dominated flats at Bolsa Chica, which have been isolated from tidal influence for 70 years, to see that maintenance of substrate salinity in an essentially closed system is definitely both possible and fairly frequently encountered in southern California.

In summary, we found that 20 acres of Area A functioned as wetland in September 1991, and that we saw little reason to assume that less than 37.5 acres of wetland would exist in Area A given normal rainfall. This continues to be our position.

It is important to realize that the Commission and the Department have used the Cowardin wetland definition for wetland identification purposes in the Commission's land use decisions since 1978 (when the 1979 document was still an operational draft); that the Commission allied the wetland definition contained in the Coastal Act with the U.S. Fish and Wildlife Service's (USFWS) wetland definition (i.e., Cowardin, 1979) in the Commission's Interpretive Guidelines (1982); and that the Commission very clearly indicates in these Interpretive Guidelines that the USFWS definition is to be used for wetland identification in the Coastal Zone. The USFWS definition identifies areas which are at least seasonally dominated by hydrophytes as wetlands. In Area A, 20 acres are dominated by Salicornia virginia, an obligate hydrophyte with a wetland occurrence probability in excess of 99 percent after five years of drought. The areas in which Salicornia virginia continues to dominate are usually at a somewhat lower elevation than the patchy pickleweed and other areas which do not presently function as wetlands. The reason that pickleweed continues to dominate the lower elevations is that these lower areas are wetter longer than the areas at higher elevations. Areas which are wet enough, long enough to support dominance by hydrophytic vegetation are wetlands per the USFWS definition. Any fair application of the Cowardin (USFWS) wetland definition to Area A will reveal the presence of not less than 20 acres of pickleweed-dominated saltmarsh, which is clearly a wetland type.

In Area B we are on record as having agreed with the Corps of Engineers identification of 170.56 acres of wetland. During the evolution of the now certified Playa Vista Land Use Plan, we predicted that, were it not for the then ongoing agricultural operation, wetlands in Area B would expand. These agricultural

5-60400

A 5 PLU 60417
Exhibit 11
p 3
wetland

Mr. Jim Burns
December 20, 1991
Page Four

activities ceased for approximately three years prior to the Corps' wetland determination, and, as we predicted, the wetlands did expand into the area which was formerly used for the production of barley and lima beans. Further, wetlands expanded in the triangular area south of Centinella Creek and immediately adjacent to Lincoln Boulevard presumably in response to increased run-off from recently developed areas located on the bluffs. We were instrumental in the ultimate designation of 170.56 acres of wetland by the Corps in Area B and we support that figure as accurate. In Area C, we identified 2.5 acres of wetland in our previous determination, and we continue to believe this to be an accurate assessment. In area D, outside the Coastal zone, east of Lincoln Boulevard and south of Ballona Creek Channel, we have not independently determined wetland acreage. However, we have examined the Corps' delineation, briefly inspected Area D, and find the Corps' identification of 3.47 acres of wetland in Area D to be accurate.

For these reasons we find that 196.53 acres of wetland presently exist within the overall planning area, and we find that 214.03 acres would likely exist given a return of normal precipitation.

Should you have questions regarding this memorandum, please contact Mr. Bob Radovich, Wetland Coordinator, Environmental Services Division, Department of Fish and Game, 1416 Ninth Street, Sacramento, California 95814, telephone (916) 653-9757.

Howard A. Sarasohn for

Pete Bontadelli
Director

cc: Mr. William Shafroth
Resources Agency

5-00400

A 5 PLV 00417
Exhibit 11 p4



This map is accurate for wetland in Area B







Area B

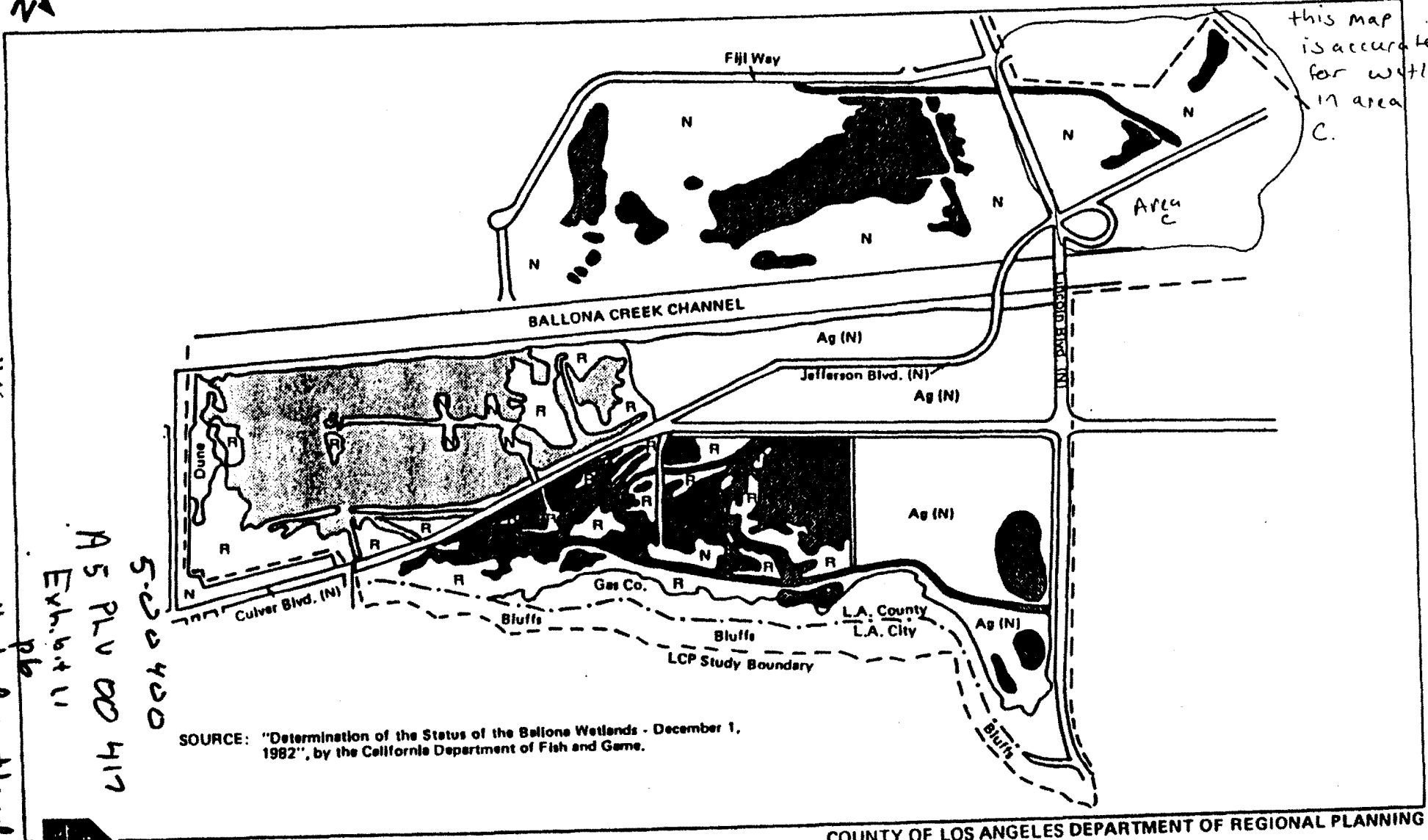
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A 5 PLV 00 417
 Exhibit 11 P5
 attached to

map 14

PRESENT STATUS OF THE BALLONA REGION

	Non-degraded wetland		Feasibly restorable former wetland		Former wetlands Agricultural Field
	Degraded wetland		Former wetland not feasibly restorable		Environmentally sensitive upland



this map is accurate for wetland in area C.

1146
 attached wetland map
 Exhibit 11
 AS PLU 00 417
 5-20-80

SOURCE: "Determination of the Status of the Ballona Wetlands - December 1, 1982", by the California Department of Fish and Game.

Gas issue
Summary from ETI

EXECUTIVE SUMMARY

Exploration Technologies, Inc. (ETI) was retained in May 1999 by the City of Los Angeles, Department of Building and Safety (LADBS), and Playa Capital to serve as Peer Reviewer regarding subsurface methane gas issues in the proposed Playa Vista Development in Los Angeles, California. In order to provide adequate methane data for evaluation, ETI designed and supervised the collection and analysis of two shallow soil vapor surveys consisting of 812 sites placed on a 100 foot staggered grid over the First Phase of the Playa Vista Development. The soil gas samples were collected by Scientific Geochemical Services in Casper, Wyoming and analyzed by Microseeps in Pittsburgh, Pennsylvania. Using the soil gas data as a guide, 32 monitor wells were installed by Camp, Dresser and McKee and sampled for their free and dissolved gases. Gas analysis for these samples were also conducted by Microseeps. Stable carbon isotopes for the free gases in the ground water were analyzed by Isotech Labs in Champaign, Illinois.

This soil gas and ground water data have defined two main areas of methane gas seepage, one very large thermogenic gas anomaly (the soil gas expression is over 1700 feet in length and 200 feet wide) in Track 01 and another, slightly smaller thermogenic gas anomaly (slightly smaller in size, but not in concentrations) in the southern part of Track 02. Anomalous levels of ethane, propane and butanes are coincident with methane in both anomalies, inferring that the methane is related to deeper thermogenic sources. The free gases and the dissolved gas anomalies in the ground water within the 50-foot gravel aquifer are also directly related to the soil gas anomalies indicating a vertical migration pathway from deeper sources. Methane isotopes completes this investigation, confirming a common, thermogenic source for the gases measured within these two anomalous areas.

The source of the thermogenic gas observed at the Site is most likely derived from shallow natural gas sands within the Upper Pliocene Pico Formation, probably sourced from the gross interval from 510 feet to 3434 feet, encountered in the non-commercial wells surrounding the Site. There is a north-south linear trend (1700 feet long and 200 feet wide) of very large to intermediate methane concentrations defined by soil gas, dissolved gas, free gas and isotopes measured in the aquifer, which lies to the east and parallel to Lincoln Boulevard. This anomaly has been interpreted as migration of thermogenic gases from depth from a proposed subsurface fault, herein named the Lincoln Boulevard Fault.

The position and attitude of the proposed Lincoln Boulevard Fault is based upon a combination of subsurface geologic data, surface topographic lineations, and a north-south trend of anomalous geochemical data. With respect to seismicity, this fault should be considered as a potentially active low potential fault. Geochemically, this fault is an active pathway for vertical natural gas migration. The proposed Lincoln Boulevard Fault provides a permeable vertical pathway for the natural gases at depth to migrate to the near-surface and have the observed distribution and concentrations.

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A 5 PLU 00 4117
Exhibit 12
ETI report
excerpt p 1

A future earthquake with an epicenter close to the site could potentially cause a rapid flux of very large volumes of thermogenic methane gas to the surface along the Lincoln Boulevard Fault plane. Because the geologic data from the surrounding wells is only of a general nature and of an early vintage, it is not possible to calculate, or even estimate, the volumes of shallow natural gas beneath the Site. Adequate well logs or other testing data is not available.

Present data indicate that the anomalous methane gas concentrations could extend to the north into Area C. Data from this assessment do not show any evidence that the source of thermogenic gas is from the gas storage facility.

Methane mitigation systems should be required for all buildings in the First Phase of the Playa Vista Development. The design of the methane mitigation systems should follow the same specifications as previously modified and approved for the Fountain Park Apartments in Tract 03.

Because of the very high methane concentrations in soil vapor in the Tract 01 and Tract 02 anomalies, and the future potential for an earthquake-induced flux of additional very large volumes of methane gas in these same anomalous areas, it is recommended that there be mitigation of the 50-foot gravel aquifer in these two areas. A monitor well system should be required to continuously measure methane gas concentrations in the 50-foot gravel aquifer.

A similar subsurface methane assessment should be conducted in the Tract 49104-04 and Tract 52092 areas of the remainder of the First Phase Playa Vista Development. Although the available data is too limited in scope for adequate evaluation, there is no question that a similar methane issue exists in these areas.

Although only leaking minor amounts of thermogenic gas, the Universal City Syndicate Vidor #1 well and the Cooperative Development Co. Community #1 well should be re-abandoned.

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A 5 PLV 00417
Exhibit 12
Eti Report
(summary)
p 2

7.0 CONCLUSIONS

1. Results from this comprehensive assessment indicate the source of the anomalous thermogenic methane is primarily from shallow natural gas within the Upper Pliocene Pico Formation. These shallow natural gas sands are beneath the area of First Phase Playa Vista Development, and are migrating up the Lincoln Boulevard Fault.
2. A previous subsurface methane assessment, limited to the area of Tract 03, indicated that the probable source of anomalous methane was leakage of thermogenic gas from the Universal City Syndicate Vidor #1 well. Although there is some leakage from this well, the dominant seepage appears to issue from a natural, fault related seep.
3. Methane concentrations in soil gas samples from the near-subsurface and from groundwater samples within the 50-foot gravel aquifer range from background to nearly 100%. The correlation between these samples is excellent, indicating migration from natural subsurface pathways.
4. There are two main areas of high methane concentrations (above 70% methane, see Plate 11) in the west half of Tract 01 and the south half of Tract 02. Anomalous levels of ethane, propane, and butanes are also coincident with these two methane seepage areas, indicating the methane is related to deeper thermogenic sources.
5. There is a north-south linear trend (1700 feet long and 200 feet wide) of very large to intermediate methane concentrations of soil gas, which lies to the east and parallel to Lincoln Boulevard. This anomaly has been interpreted as migration of thermogenic gases from depth from an associated subsurface fault.
6. Areas of anomalous methane concentrations dissolved in groundwater and methane from free gas in the groundwater from the 50-foot gravel aquifer are coincident with the anomalous areas of ethane, propane and butanes, which are only sourced by thermogenic sources. The data indicate that all three data sets have a common origin. This correlation of independent data sets confirms that the methane is from a deeper thermogenic source.
7. Methane isotope analyses on free gases collected from the 50-foot gravel aquifer further confirm a thermogenic source for the anomalous methane gas. Areas of background to low methane concentrations are primarily biogenic in origin, but bear a spatial relationship that suggests that the biogenic gases have been generated in response to the thermogenic gases.
8. Three independent analytical data sets (soil gas, groundwater, and isotopes) are in concert and confirm that the source of areas of anomalous methane soil gas is due solely to a thermogenic source.

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ETI report
excerpt (conclusions)
Exhibit 12 p 3

9. The source of the thermogenic gas observed at the Site is most likely derived from shallow natural gas sands within the Upper Pliocene Pico Formation, probably sourced from the gross interval from 510 feet to 3434 feet, encountered in the non-commercial wells surrounding the Site.
10. It is not possible to calculate, or even estimate, the volumes of shallow natural gas beneath the Site due to nature of the surrounding well data. Adequate well logs or other testing data is not available.
11. The position and attitude of the proposed Lincoln Boulevard Fault is based upon a combination of subsurface geologic data, surface topographic lineations, and a north-south trend of anomalous geochemical data. With respect to seismic activity, this fault should be considered as a potentially active low-potential fault. Geochemically, this fault is an active pathway for vertical natural gas migration.
12. The proposed Lincoln Boulevard Fault provides a permeable vertical pathway for the natural gases at depth to migrate to the near-surface, and exhibit the distribution and magnitudes observed.
13. A future earthquake with an epicenter close to the Site could potentially cause a rapid flux of very large volumes of thermogenic methane gas to the surface along the Lincoln Boulevard Fault plane.
14. Present data indicate that the anomalous methane gas concentrations could extend to the north into Area C.
15. Data from this assessment do not show any evidence that the source of thermogenic gas is from the gas storage facility.

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ETI conclusion (exhibit)
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Exhibit 12 p 4

8.0 RECOMMENDATIONS

1. Methane mitigation systems should be required for all buildings in the First Phase of the Playa Vista Development. The design of the methane mitigation systems should follow the same specifications as previously approved for the Fountain Park Apartments in Track 03.
2. Because of the very high methane concentrations of free gas (greater than 70 %, see free gas contour map, Plate 11) in the gravel aquifer, and the future potential for an earthquake-induced flux of large volumes of methane gas in these same anomalous areas, it is recommended that there be mitigation of the 50-foot gravel aquifer in these areas having methane concentration in excess of 70%.
3. For the methane mitigation system of the 50-Foot gravel aquifer a pump and treat methane stripper system is recommended. Pump tests in the aquifer are required in order to determine the number and spacing of the recovery wells required. This must also include water reinjection to prevent subsidence.
4. A monitoring well system following the design approved for the Visitor Center in Track 03 will also be required to continuously measure methane gas concentrations in the 50-foot gravel aquifer.
5. A similar subsurface methane assessment should be conducted in the Tract 49104-04 and Tract 52092 areas of the First Phase Playa Vista Development.
6. Although only leaking minor amounts of thermogenic gas, the Universal City Syndicate Vidor #1 well and the Cooperative Development Co. Community #1 well should be re-abandoned.
7. In the future, methane assessments should be conducted and methane mitigation and monitoring systems completely designed at sites slated for development before zoning is approved.
8. A similar subsurface methane assessment should be conducted in the area of Second Phase Playa Vista Development before zoning use is established and, more important, to aid in the planning.
9. The City of Los Angeles Methane Gas Code should be revised to provide conditions for mitigation based upon whether the methane gas is of a biogenic or thermogenic origin.

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encl p 4 p 5
recommendation

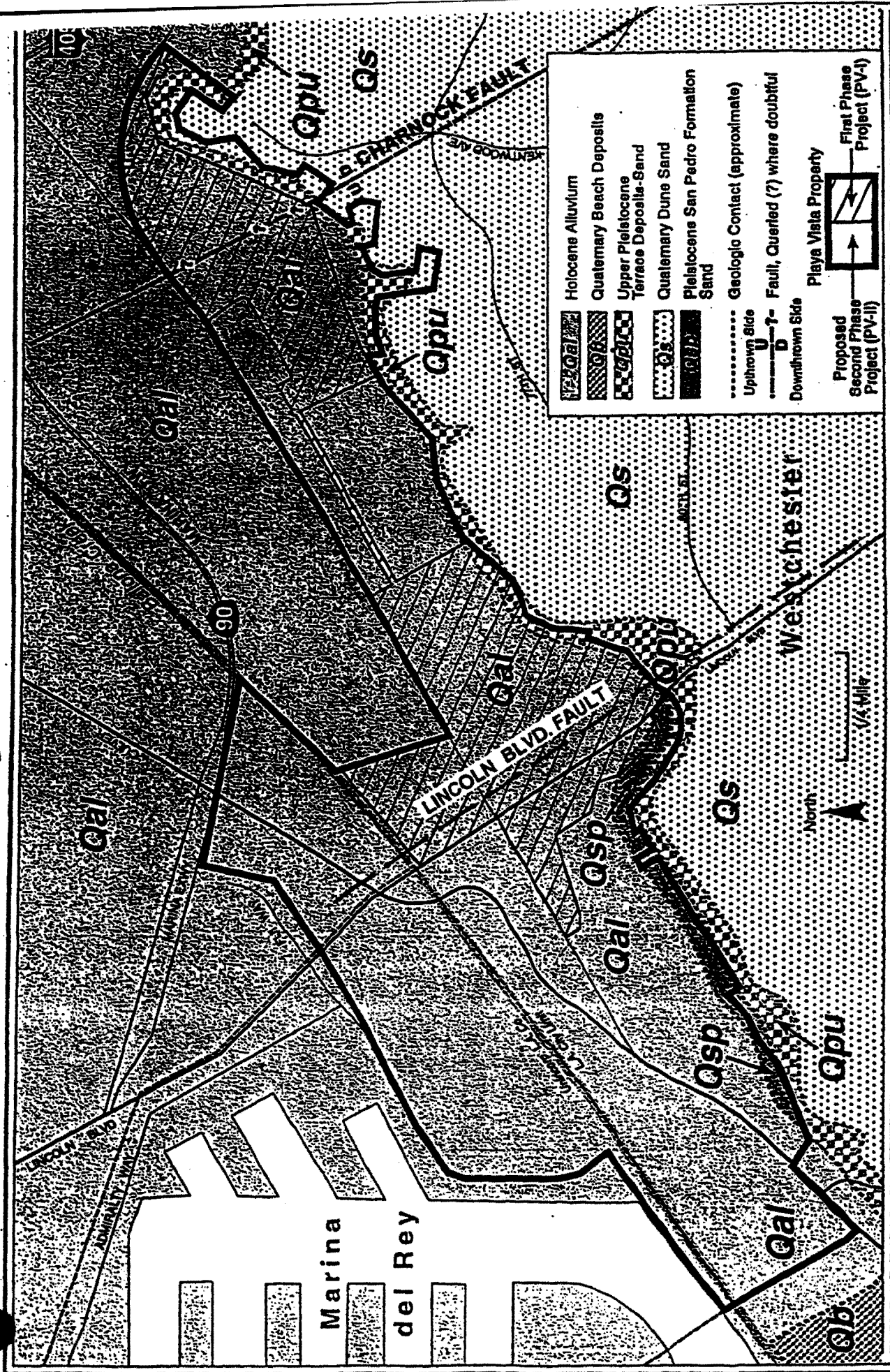


Figure 4. Generalized Surface Geology
(Modified after CDM, 1998)

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Exhibit 12 p. 6 Figure

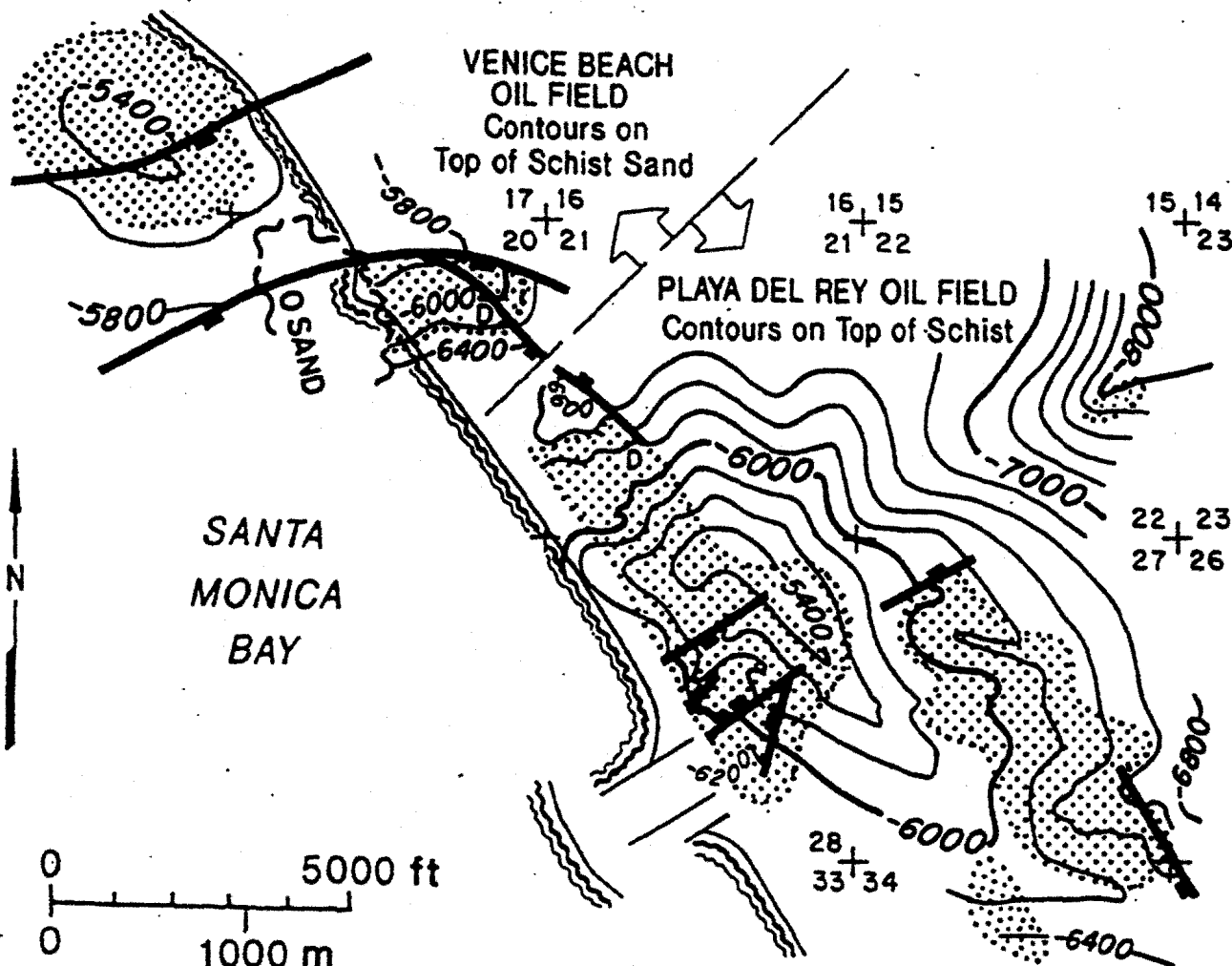
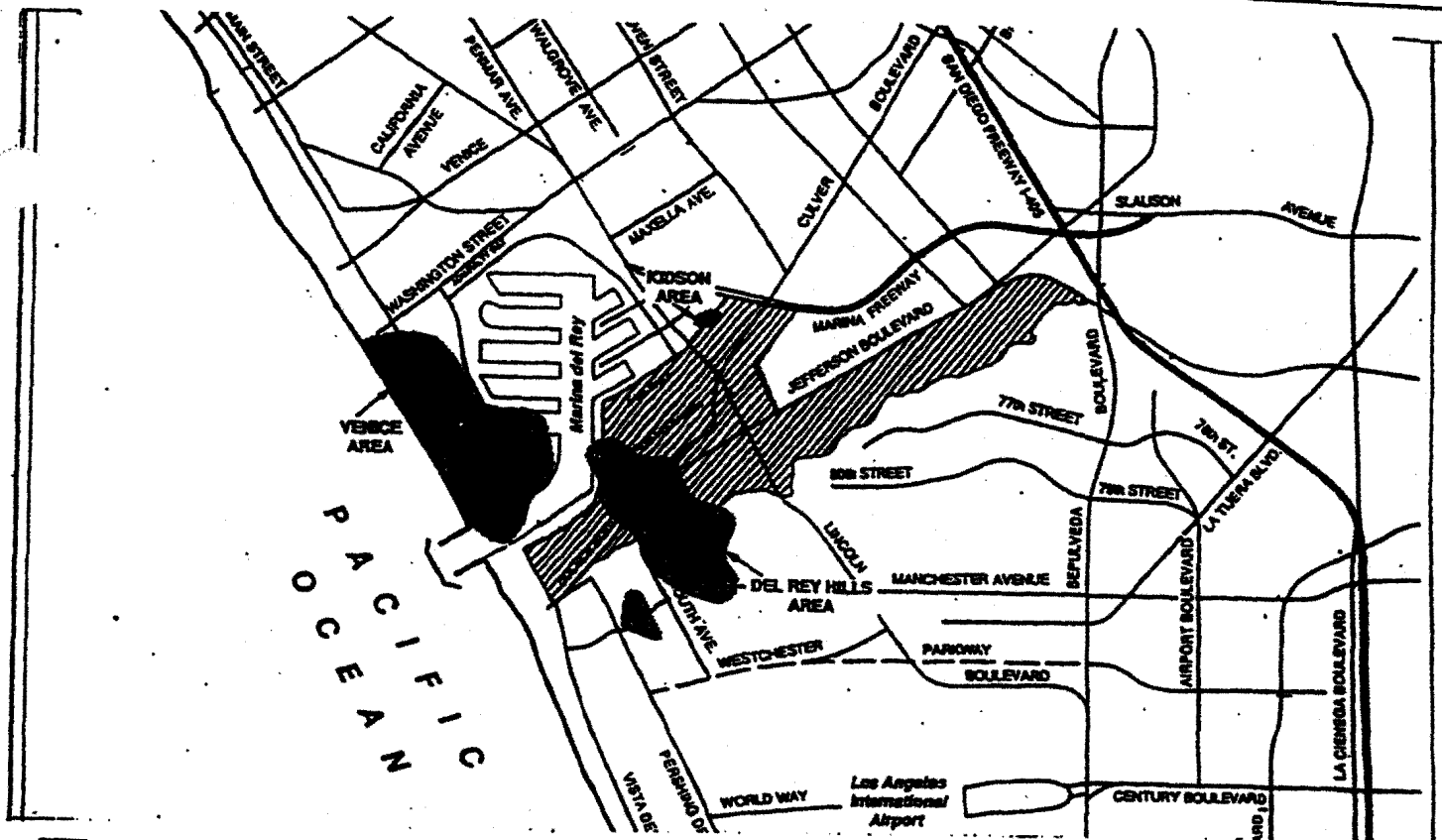


Figure 6. Location and Structure of Playa del Rey Oil Field

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Exhibit 12 p 7
map

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South Coast Region

MAR 8 2001

CALIFORNIA
COASTAL COMMISSION

**CITY INVESTIGATION OF POTENTIAL ISSUES OF
CONCERN FOR COMMUNITY FACILITIES DISTRICT
NO. 4 PLAYA VISTA DEVELOPMENT PROJECT**

Prepared by
City of Los Angeles
Office of the Chief Legislative Analyst

March, 2001

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Exhibit B
Excerpt from
CLH 5009

EXECUTIVE SUMMARY

Study Purpose

This report has been prepared in response to the direction of City Council to the Office of the Chief Legislative Analyst (CLA) to provide information to the Planning and Land Use Management Committee and the City Council relative to a variety of potential risk factors at the Playa Vista Development site, so that Council can decide whether the City should provide Mello-Roos financing for some of the infrastructure and ecological components of the Playa Vista Development Project.

Community Facilities District No. 4 Playa Vista Development Project Description

Community Facilities District No. 4 (CFD4) is a portion of the master planned community known as Playa Vista (Playa Vista Development Project). The Playa Vista Development Project has an approximate area of 1,087 gross acres and is over three miles long and one mile wide. It is located on the west side of the City, approximately 11 miles west of downtown, four miles south of the City of Santa Monica and three miles north of the Los Angeles World Airport. The overall Playa Vista Development Project includes residential units, office space, retail, media and technology facilities, community serving facilities (i.e. school, day-care, etc.), wetland and habitat restoration, open space and recreational areas, and infrastructure.

CFD4 is a portion of Phase I of the Playa Vista Development Project. CFD4 is located immediately east of Lincoln Boulevard on both sides of Jefferson Boulevard and consists of approximately 169 gross acres, of which 79.4 acres are expected to be subject to the proposed Mello-Roos Special Tax. The Developer's plans call for development of dwelling units, retail and commercial facilities, library, school, other community-serving facilities, open-space, habitat improvements/enhancements, and infrastructure development and improvements.

Background and Process

On June 6, 2000, the Budget and Finance Committee conducted a public hearing on the proposed issuance of Mello-Roos bonds for CFD4. During the hearing, several questions were raised which the Committee determined required further analysis. The Committee instructed the CLA to supervise the analysis and authorized the CLA to convene a working group of City departments and other agencies as necessary and contract with outside consultants to conduct the analysis. These instructions included holding a public hearing to obtain input from the public on the scope of the study. Once the analysis was complete, the CLA was instructed to report back to the Planning and Land Use Management Committee and the City Council to resolve the policy issues relative to the safety of the site. Once those policy issues are resolved, the intent is for the Budget and Finance Committee to again consider the issuance of the Mello-Roos bonds.

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Excerpt
CLA Soil Gas
Study p2
Exhibit 13

On June 20, 2000, the Council adopted the Budget and Finance Committee report. The CLA proceeded to convene a working group consisting of the Department of Building and Safety (DBS), Planning, Department of Public Works Bureau of Engineering (BOE), City Attorney, and the Office of Administrative and Research Services (OARS). The CLA, with the assistance of the working group, developed a draft study scope.

Study Scope and Design

The draft Study Design and Scope, which included investigation of methane, hydrogen sulfide (H₂S), and air toxics (benzene, toluene, ethyl-benzene, and xylene (BTEX)) was released for public review and comment and a public hearing was held to accept public comments and in-put into the study design on July 18, 2000. In response to public comments received, the study was expanded to include a review of subsidence. Further, technical issues commented on by the public were considered as the study elements were developed and reviewed. During the investigation process, the study scope was further expanded to address risks associated with soil and groundwater contamination.

The Study was completed in three steps. This stepped approach allowed the City to maximize resources and avoid unnecessary duplication of data/information collection.

The City engaged the professional services of Kleinfelder to assist in review of methane data and to perform a health risk assessment for BTEX and H₂S emissions identified at the CDF4 site. The City requested the assistance of the California Department of Conservation Divisions of Geology and Mines (Division of Geology and Mines) and of Oil, Gas, and Geothermal Resources (Division of Oil and Gas) in the review of earthquake fault and methane issues respectively. The City contacted the California Regional Water Quality Control Board, Los Angeles Region (LARWQCB) regarding soil and groundwater remediation issues and associated health risks.

The study results are being released for public review and comment from March 9, 2001 to April 9, 2001. Comments received will be considered and evaluated and the report modified as appropriate. Comments should be submitted to:

Barb Garrett
Legislative Analyst
200 N. Main Street, Room 512,
Los Angeles, CA 90012

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Excerpt, CLIT
Exh. b + 13
p 3

Exploration Technologies, Inc.

3698 Westchase Dr • Houston, Texas 77042 • (713) 785-0393 • FAX (713) 785-1550

January 31, 2001

Mr. David Hsu
Chief, Grading Engineering Section
City of Los Angeles
Dept. of Building and Safety
201 North Figueroa Street
Los Angeles, CA 90012-2827

Dear David,

Playa Del Rey Gas Storage Field and Lincoln Blvd. Fault:

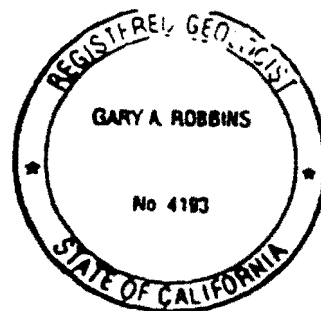
As confirmed by our earlier letters (December 20, 2000 V T Jones to Ray Chan), we have completed our preliminary evaluation of the regional soil gas data collected over the entire Playa Vista site, including the locations for 119 infill soil gas samples to complete this data set. The regional soil gas data collected as part of Phase II evaluations shows no evidence of major gas leakage from the Playa Del Rey Gas Storage Field. In addition we have collected and completed evaluation of nine additional storage gas reservoir samples taken directly from several of the storage and observation wells. Comparison of the chemical and isotopic data from these wells with the near-surface and Ballona gravel aquifer gas samples previously analyzed on the Playa Vista site shows that the storage gases are not present in any of the methane anomalies observed east of Lincoln Blvd. The gas seepage on the Playa Vista site appears to be derived from the Pico Sands at depth and does not have the geochemical signatures characteristic of storage gas.

Preliminary interpretation of the geophysical data from seismic profiles supports the premise that the methane gas found east of Lincoln is moving upward within a vertical zone of disrupted strata from beds of the Pico Formation. Offsets in reflections of the seismic profile may be interpreted as zones of disrupted strata, which are likely permeable to gas. Preliminary data reprocessing suggests the presence of low-velocity zones (possibly due to the presence of gas) that appear to be associated with both the disrupted strata and with the location of the anomalous methane found on the Playa Vista site. Thus the near-surface gas anomalies appear to be issuing from fractures or other disruptions that directly underlie the methane anomalies as defined by the soil gas surveys. As noted in an earlier letter, (Victor Jones to Ray Chan, December 7, 2000) interpretation of the chemical and geophysical data does not support the existence of the Lincoln Blvd. Fault that was postulated to dip westward and possibly transect strata within the existing gas storage field, as communicated in our April 17, 2000 report to LADBS. This combined geochemical and geophysical information supports that the methane gas seepage observed on the Playa Vista site does not come from the Southern California Gas Storage Field.

Sincerely,

V.T. Jones III
Victor T. Jones, III, Ph.D
Peer Reviewer for LADBS
President, Exploration Technologies, Inc

Gary A. Robbins
Gary A. Robbins, Ph.D
Peer Reviewer for LADBS
Manager, Tankinfo, LLC



*A. L. O. O. 417
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Exh. b. t 13 p4*

*review of CLA
5/2/9*

Playa Vista Development
 Los Angeles, California
 Methane Concentrations (ppmv)
 4 Foot Soil Gas Survey

METHANE CONCENTRATIONS (ppmv)

Black	> 150,000
Dark Grey	12,500 - 150,000
Medium Grey	1,000 - 12,500
Light Grey	100 - 1,000
White with dots	30 - 100
White with horizontal lines	10 - 30
White	< 10

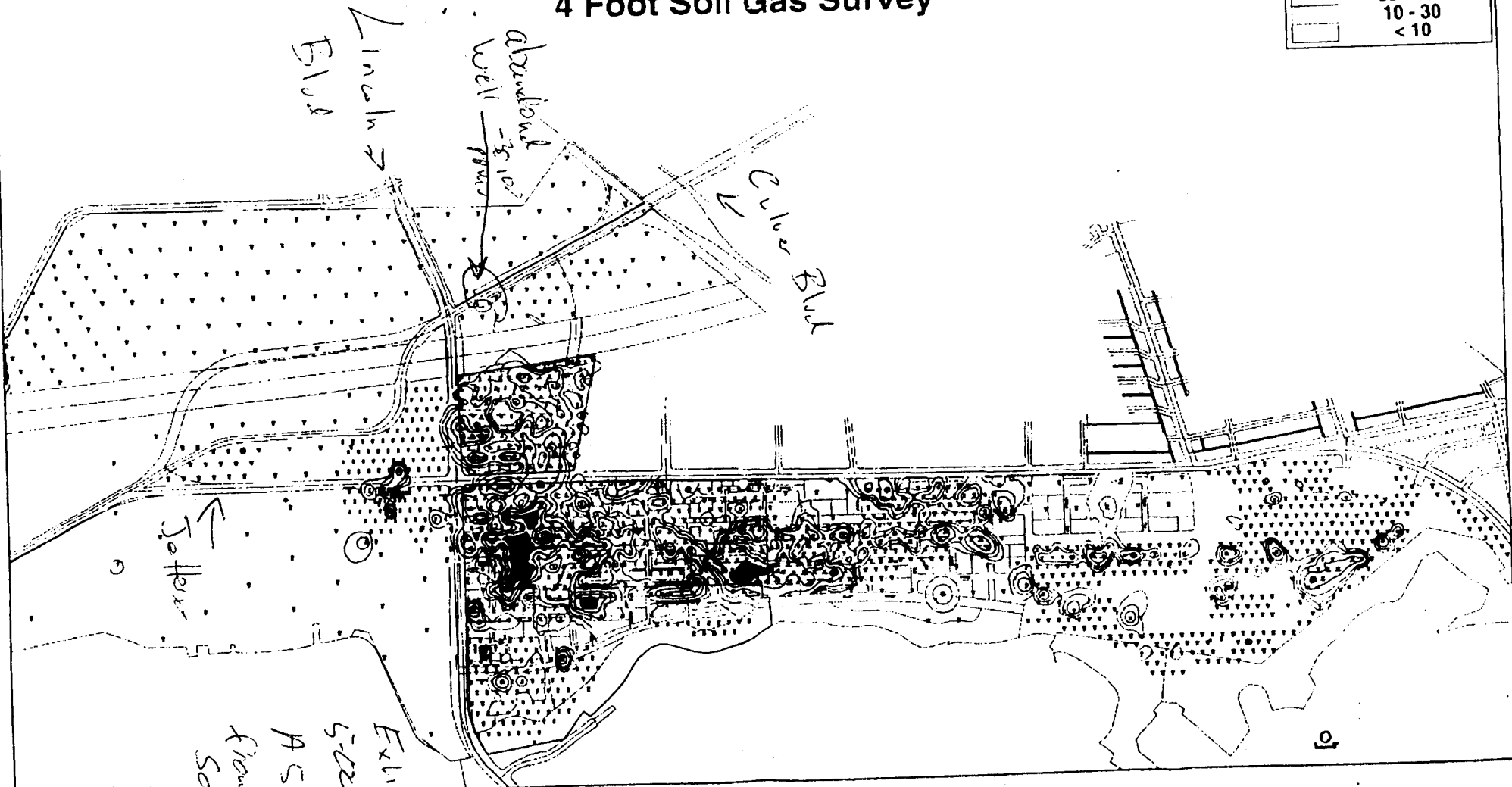


Exhibit 13
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 from
 Soil Scan
 staff



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99-211901-2001PR000011

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200
FAX (415) 904-5400



12 December 2000

MEMORANDUM

To: Pam Emerson, Los Angeles Area Supervisor
From: Mark Johnsson, Senior Geologist
Re: Culver Boulevard widening project and potential soil methane hazards

At your request, I have reviewed the following document relevant to the proposed widening of Culver Boulevard and ramp construction at the intersection of Lincoln and Culver Boulevards, Los Angeles:

Camp Dresser and McKee 2000, "Soil gas sampling and analysis for portions of Playa Vista areas A and C near Culver Boulevard widening project", 4 p. geologic letter report to Maria P. Hoyer dated 27 November 2000 and signed by A. J. Skidmore and M. Zych (RG).

As you are aware, a concern has been raised that the proposed development would be at risk of explosion due to buildup of methane from gas seeps known to exist in the vicinity. The report describes a soil gas sampling protocol that would appear adequate to characterize methane concentrations adjacent to Culver Boulevard between Lincoln and Boulevard and the Marina Expressway. Although the sample spacing was too coarse to adequately delineate an anomaly, it was appropriate for the detection of an anomaly sufficient to pose a hazard to the proposed development. The other parts of the sampling protocol appear to be adequate

The report indicates that soil methane concentrations encountered range from 0.48 to 5.43 ppmv. For reference, the concentration of methane in the atmosphere is currently about 1.75 ppmv, and the lower explosive limit of methane is 50,000 ppmv; thus the values reported in the referenced document represent essentially background levels. Although no data are provided with which to assess methane flux, it seems reasonable to assume that the flux is very low, since limited exchange of soil gas with the atmosphere at the 4-foot sampling depth would otherwise have resulted in much higher methane concentrations in soil gas. Accordingly, it appears that no significant methane seeps occur in the area investigated.

Further, methane would only be able to attain dangerous levels if it were allowed to accumulate in an enclosed space. No such enclosed space exists beneath a roadbed. Any

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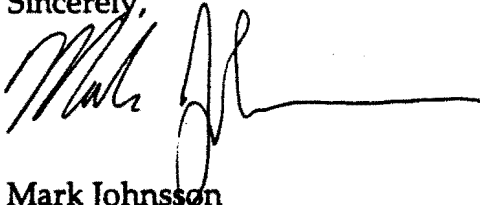
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staff geologist letter

methane escaping from the soil beneath the roadbed would simply move laterally until a free path to the surface was encountered.

Therefore, it is my opinion that no explosion hazard exists in association of the widening of Culver Boulevard between Lincoln Boulevard and the Marina Expressway, nor will the construction of a ramp between Culver and Lincoln Boulevards create such a hazard.

If you have any further questions, please do not hesitate to contact me.

Sincerely,



Mark Johnsson
Senior Geologist

5-00400

A 5 ~~00~~ PLU 00417

Exhibit 14

p 2

evaluation of
hazard

Page 2 of 2

12/12/00

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: May 10, 2000

To: William T. Fujioka, General Manager
City Administrative Officer

From: Vitaly B. Troyan, P.E.
City Engineer

By: Michael P. Brown, Manager
Geotechnical Engineering Division

Subject: PUBLIC WORKS REVIEW OF ETI REPORT TITLED "SUBSURFACE
GEOCHEMICAL ASSESSMENT OF METHANE GAS OCCURRENCES" DATED
APRIL 17, 2000 - PLAYA VISTA PROJECT - (File 96-092) WO E1200434

Per the request of the Department of Building and Safety, the Department of Public Works, Geotechnical Engineering Division (GED) has reviewed the subject report from Exploration Technologies, Inc. (ETI) with a focus on the distribution of hydrogen sulfide and benzene, toluene, ethylbenzene and xylene (BTEX) at this site. GED has also reviewed the data, conclusions and recommendations contained in this and a previous report from ETI dated November 29, 1999.

The April 17, 2000 ETI report presents the results of a soil gas survey of the upper 4 feet of soil at the site. The top 4 feet of fill that was tested was either native soil, old (20+ year) fill or new (less than 2 years old) fill, depending on the specific site location. Various levels of different gases contained in the native soil were documented. In some locations, the recently placed fill above the old soil/fill is up to 30 feet thick. This new fill has not had the time to reach gas concentration equilibrium with the deeper gas sources that underlie the new fill. The new fill was also sampled at 4 feet and therefore may show artificially low gas concentrations. The highest concentrations of hydrogen sulfide and BTEX in the current ETI maps correlate with areas where native soil and older fill were sampled as opposed to areas of the recently placed fill. As such for purposes of our review, we have assumed that the highest concentrations of hydrogen sulfide and BTEX found in the soil gas survey uniformly underlie the entire project.

Hydrogen sulfide levels do not appear to correlate with the occurrence of thermogenic methane, therefore two sources of hydrogen sulfide are likely. First, some hydrogen sulfide appears to be derived from shallow organic soil material, either naturally occurring, or imported to the site years ago and has been referred to by ETI as the "La Brea-area fill" or other oil-field spoils. BTEX concentrations generally correlate with hydrogen sulfide levels. In addition, both gases also are believed to be migrating with the deeper source of methane.

CONCLUSIONS

1. The methane mitigation system, consisting of a vapor barrier and ventilation and monitoring system and recommended by ETI for all structures in the project, is expected to be adequate to mitigate hydrogen sulfide and BTEX gases and prevent their accumulation below or within structures. The additional active "pump-and-treat" groundwater remediation system

EXHIBIT NO. 15
APPLICATION NO. 5-00406
AS PLU 00417
City evaluation

f ETI

or its equivalent as proposed by ETI is expected to decrease gas pressure in the subsurface, which will further decrease the migration of hydrogen sulfide and BTEX with the methane.

2. ETI's recommended minimum thickness of the sand-gravel or crushed rock continuous blanket for the vapor barrier/ventilation system appears to be adequate. In a phone conversation, ETI and GED mutually agreed that the horizontal pipes should be entirely within a continuous gravel blanket and not in soil filled trenches.

CLOSING STATEMENT

At this time ETI's recommendations are to rely on passive or barometric venting that will be converted to an active, fan-driven venting system when the appropriate action limits as defined in the ETI report are reached. The most recent schematic plans for the mitigation systems that this office has seen are in the November 29, 1999 preliminary report by ETI. The mitigation systems, including the groundwater remediation system in the areas of highest methane, are believed by this Department to be adequate to safely deal with the hydrogen sulfide and BTEX gases. GED understands that the mitigation systems are still being refined and will be worked out during the building permit stage.

If you have any questions with this review, please contact Mike Mulhern, CEG 1507, HG 306 at (213) 847-4011.

c: Susan Rowghani, District Engineer, West Los Angeles Engineering District
Susan Pfann, Deputy City Attorney

MEM11/PlbWksPlayaVista14.ltr

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Exhibit 15
City evaluation

Culver

Route 90

Proposed
Route 90

STATE ROUTE 90
(INT #19 AND 20)

Exhibit 16

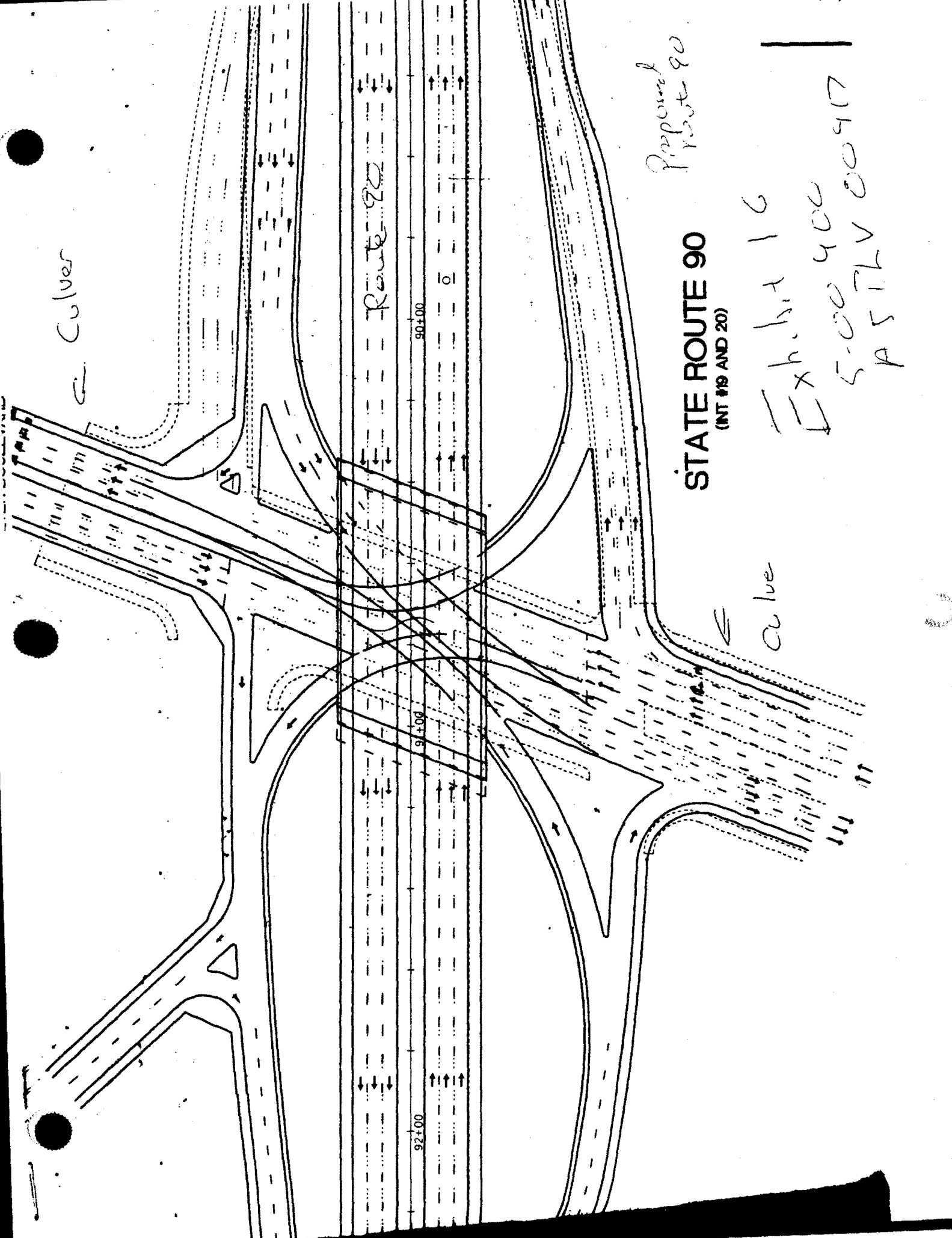
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Culver

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Playa Vista Land Use Plan City of Los Angeles Local Coastal Plan

Marina del Rey/Ball
Land Use Map
(For Reference Only)
County

- Reference Youth Hostel Location
- MEDIUM DENSITY RESIDENTIAL
 - MEDIUM HIGH DENSITY RESIDENTIAL
 - HIGH DENSITY RESIDENTIAL
 - HOTEL
 - COMMERCIAL
 - OFFICE
 - MARINE COMMERCIAL AND BOAT STORAGE
 - PARKING
 - PUBLIC FACILITIES
 - WETLANDS
 - ECOLOGICAL SUPPORT AREA
 - OPEN SPACE

- Legend
- Land Use Districts
 - Shading
 - Medium Density Residential
 - Medium High Density Residential
 - High Density Residential
 - Hotel
 - Commercial
 - Office
 - Marine Commercial and Boat Storage
 - Parking
 - Public Facilities
 - Wetlands
 - Ecological Support Area
 - Open Space

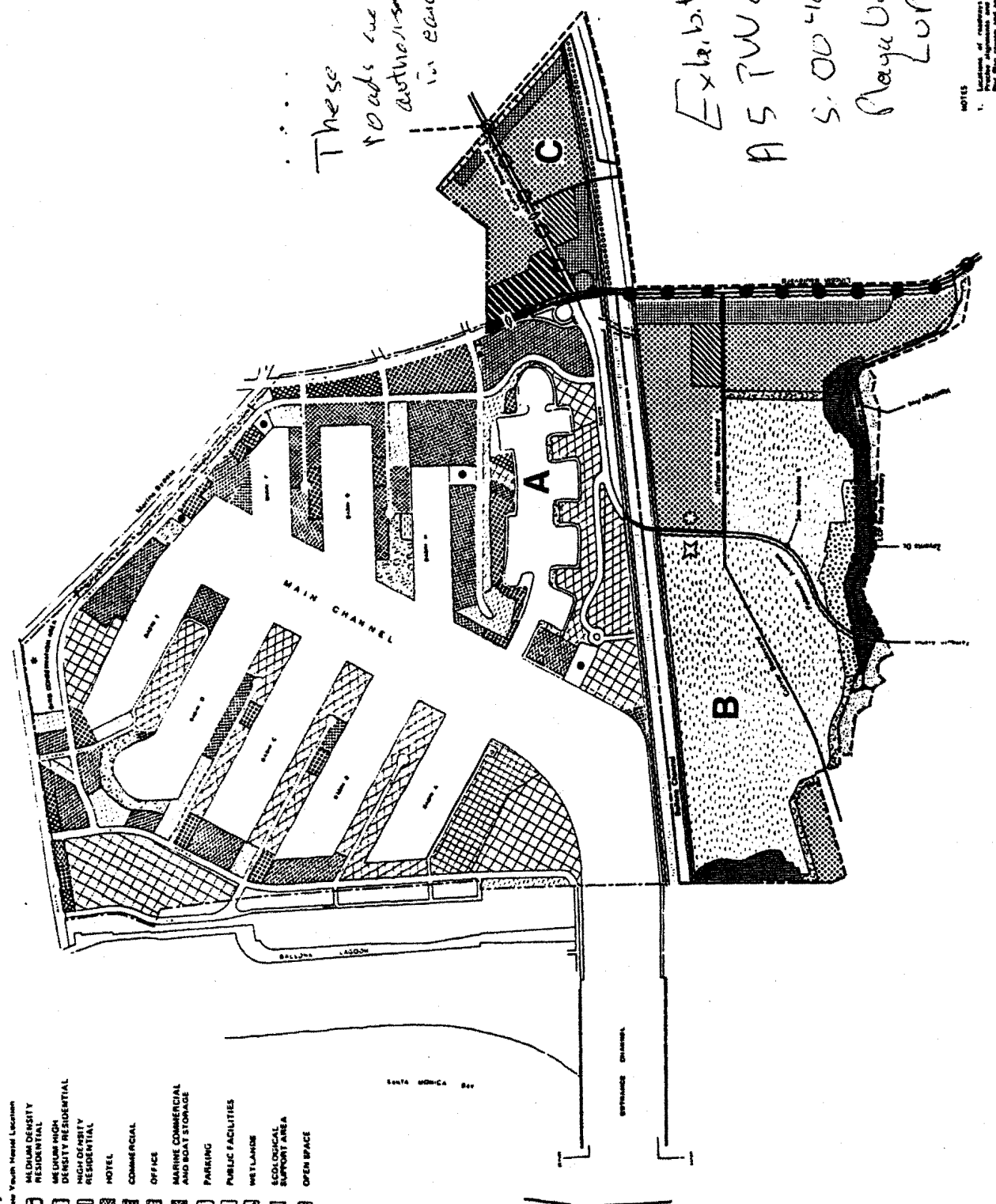
- Building Area For 2000 Acre
- 0.1 to 1
 - 2 to 7
 - 20 to 50
 - 50 to 100

- Neighborhood & Office
- Regional Commercial
- Hotel Management Area (Elevated)
- Hotel
- Ecological Support Area
- Public and Semi-Public Land
- Public Utility Facilities
- City/County Boundary (M)
- Boundary - Other Interest District (P) Area
- Coastal Zone Boundary
- Important Center
- Aluminum Youth Hostel Location

Other symbols shown on the general map of the area are intended to be used in conjunction with the information on this map. The symbols are: (M) - City/County Boundary (M) - Boundary - Other Interest District (P) Area (P) - Coastal Zone Boundary (C) - Important Center (A) - Aluminum Youth Hostel Location

- CIRCULATION
- Highway
 - Divided Highway
 - Major
 - Secondary
 - Collector
 - Provisional Highway (Local)
 - Alleyway
 - Transportation Corridor
 - Interstate Transportation Corridor

- NOTES
- Locations of buildings and land use are shown in accordance with the Plan for Review and approval process.
 - Locations of buildings and provision of buildings are shown in accordance with the Plan for Review and approval process.
 - Landmark and other buildings shown on the map are shown in accordance with the Plan for Review and approval process.
 - The information shown on this map is for reference only. It is not intended to be used for any other purpose.



These roads are authorized in Exhibit 17

Exhibit 17
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Playa Vista
LUP

TABLE 1 - SPECIFIC PLAN BUILDING HEIGHT LIMITS

TABLE 2 - SPECIFIC PLAN BUILDING HEIGHT LIMITS

TABLE 3 - SPECIFIC PLAN BUILDING HEIGHT LIMITS

**Final
Environmental Impact Report**

First Phase Project for Playa Vista
(Vesting Tract 49104)

**Mitigation Monitoring and
Reporting Program**
(Appendix D)

EIR No. 90-0200-SUB(C)(CUZ)(CUB)

State Clearinghouse No. 90010510

September 1993

City of Los Angeles

Exhibit 18

*ASPLV 00417
500400 P-1*

*(City) requirements
Phase 1*

Action Indicating Compliance
with Mitigation Measure(s): Clearance of subdivision conditions,
issuance of "B" permit.

- 25. Jefferson and I-405 Northbound
Install a northbound on-loop accessible from eastbound Jefferson from the two right most lanes. Close the northbound off-ramp. Close the median break on Jefferson and remove the traffic signal. Retain the northbound on-ramp for westbound Jefferson.

Enforcement Agency: Department of Public Works.

Monitoring Agency: Department of City Planning (Advisory Agency).

Monitoring Phase: Pre-construction, construction.

Monitoring Frequency: Once at subdivision clearance, once at approval of "B" permit.

Action Indicating Compliance
with Mitigation Measure(s): Clearance of subdivision conditions,
issuance of "B" permit.

- 25a. Jefferson and I-405 Northbound (Alternate Measure)
As described in the Amendment to the LADOT Assessment Letter (please see Appendix Y- of the Final EIR, Volume XXI), an alternative mitigation would provide the following improvements in lieu of the northbound on-loop proposed above:

- Lincoln and Culver: Provide a new interchange in the southeast quadrant of Lincoln Boulevard and Culver Boulevard that would provide two separate roadways connecting northbound Lincoln Boulevard to eastbound Culver Boulevard and eastbound/westbound Culver Boulevard to northbound Lincoln Boulevard; with new traffic signal and signal timing so as not to impede northbound traffic on Lincoln Boulevard. Provide improvements to Culver Boulevard bringing it to one through lane and one left-turn lane in the westbound direction. Provide three through lanes and one right-turn lane northbound along Lincoln Boulevard at the interchange.
- Bay Street Bridge: Connect Bay Street across the Ballona Channel to Culver Boulevard by constructing the Bay Street bridge over Ballona Channel to provide two traffic lanes and one bike lane in each direction. Provide one bike lane in each direction southerly from the Ballona Creek Bridge and provide access to existing bike path along Ballona Creek.
- Culver and Bay: Widen Culver Boulevard between Bay Street and the Marina Freeway to provide two through lanes and two left-turn

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5004028

Exhibit 15

lanes westbound and one through and one through/right-turn lane eastbound. *Widen eastbound Culver Boulevard an additional 12 feet to provide two through lanes from the Lincoln Boulevard bridge to a point east of the new signal at the ramp connection to Lincoln Boulevard.*

- Culver and Marina Freeway: Guarantee construction of a 56-foot wide, three-lane westbound portion (or as an interim measure, two lanes in each direction) of a grade-separated interchange at Culver Boulevard and the 90 Freeway with new freeway lane restriping easterly to a point beyond the Ballona Creek Channel Bridge, all to the satisfaction of Caltrans. Complete the eastbound portion of this interchange if funding is provided by other sources for this location. This measure would replace the Culver and Marina Freeway measure listed on page V.L.1-94 of the Draft EIR.
- Jefferson and Westlawn: Contribute to the design and construction of ATSAC. This measure would replace the Jefferson and Westlawn measure listed on page V.L.1-96 of the Draft EIR.
- Jefferson and I-405 Northbound: Widen the north side of Jefferson by up to 8 feet. Widen the northbound on ramp to provide for three lanes. These improvements must be approved and coordinated by the City of Culver City and CALTRANS. This measure would replace the Jefferson and I-405 Northbound measure listed on page V.L.1-95 of the Draft EIR.

Enforcement Agency: Department of Public Works.

Monitoring Agency: Department of City Planning (Advisory Agency).

Monitoring Phase: Preconstruction, construction.

Monitoring Frequency: Once at subdivision clearance, once at approval of "B" permit.

Action Indicating Compliance with Mitigation Measure(s): Clearance of subdivision conditions, issuance of "B" permit.

26.

Jefferson and I-405 Southbound
Add an eastbound right-turn lane. Add a second westbound left-turn lane. Widen on-ramp to provide three lanes. This improvement requires Caltrans approval. Contribute to the design and construction of ATSAC.

Enforcement Agency: Department of Public Works.

Monitoring Agency: Department of City Planning (Advisory Agency).

Monitoring Phase: Pre-construction, construction.

97 997546

Exhibit 18 p 2
A PLV 00417
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p.3
Ct. requirements



PLAYA VISTA

12333 W. JEFFERSON BLVD. # 300
LOS ANGELES, CALIFORNIA 90006

TEL: 310.822.0074
FAX: 310.821.9420

March 7, 2001

Ms. Pam Emerson
California Coastal Commission
200 OceanGate Avenue, 10th Floor
Long Beach, CA 90802

Re: The Widening of Culver Boulevard

Dear Ms. Emerson:

Per your suggestion, Playa Vista will revise our plans for the Culver Blvd. widening project to include a standard sidewalk along the south side of Culver Blvd. from the north side of the Playa Vista Dr. connection to the Marina Freeway connection.

Should you have any questions, please feel free to contact me at 310/448-4676.

Sincerely,
Playa Capital Company, LLC

Catherine Tyrrell
Environmental Affairs Director

CT/sd

Exh. 6.4 1P



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

RECEIVED
South Coast Region

IN REPLY PLEASE
REFER TO FILE: **MP-9**

March 15, 2001

MAR 22 2001

CALIFORNIA
COASTAL COMMISSION

Ms. Pam Emerson
South Coast District
California Coastal Commission
P.O. Box 1450
Long Beach, CA 90802-4416

Dear Ms. Emerson:

COASTAL DEVELOPMENT PERMIT APPLICATION NO. 5-00-400

I understand the Playa Capital Company is seeking a Coastal Development Permit from the California Coastal Commission to improve an existing connector road between eastbound Culver Boulevard and northbound Lincoln Boulevard and to create a new connector road between northbound Lincoln Boulevard and east and westbound Culver Boulevard (see enclosed sketch). Playa Capital Company has requested that we inform your agency of our consent to the subject application.

Based on the preliminary alignments of the proposed road improvements, it appears that these improvements will utilize a portion of the existing connector road under the jurisdiction of the City of Los Angeles and on property owned in fee by the County of Los Angeles.

If and to the extent that the Commission requires it to do so, please be advised that the County consents to the proposed improvements subject to the approval of the project construction by the City of Los Angeles and the Commission, and subject to the County granting easements over the above-mentioned property to the City of Los Angeles as are necessary to accomplish the project. The granting of these easements shall be made prior to construction.

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Exhibit 120

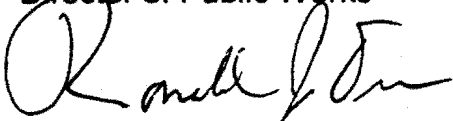
81

Ms. Pam Emerson
March 15, 2001
Page 2

If you have any further questions about the foregoing, please feel free to call Mr. Greg Kelley, head of our Mapping & Property Management Division at (626) 458-7000.

Very truly yours,

HARRY W. STONE
Director of Public Works



RONALD J. ORNEE
Assistant Director

MY:in
P9:lrMJY1

Enc.

cc: Playa Vista (Catherine Tyrrell)

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Exh. bit 20
P2

Recording Requested By:

MAGUIRE THOMAS PARTNERS - PLAYA VISTA

When Recorded Return To:

MAGUIRE THOMAS PARTNERS - PLAYA VISTA
c/o Maguire Thomas Partners
1299 Ocean Avenue, Suite 1000
Santa Monica, California 90401
Attention: Craig A. Smith, Esq.

COPY of Document Recorded
90-1515156
as No. _____
This copy has been compared with original.
It will be returned when
the original has been completed.
REGISTRAR - RECORDER

EASEMENT AGREEMENT

BY AND BETWEEN

U.S. TRUST COMPANY OF CALIFORNIA, N.A.

AND

**MAGUIRE THOMAS PARTNERS - PLAYA VISTA,
a California limited partnership**

RECEIVED

AUG 16 1995

**CALIFORNIA
COASTAL COMMISSION
SOUTH COAST DISTRICT**

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Ex b, b. # 21
P1

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EXHIBIT B - LEGAL DESCRIPTION OF BENEFITED PROPERTY . B-1

EXHIBIT C - LEGAL DESCRIPTION OF EXPANDED WETLANDS . . C-1

Exhibit 21 p2
5-00400
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[

EASEMENT AGREEMENT

This Easement Agreement ("Agreement") is made as of the 30th day of August, 1990 by and between U.S. Trust Company of California, N.A., as trustee ("Trustee") and Maguire Thomas Partners - Playa Vista, a California limited partnership ("MTP-PV").

RECITALS

A. The Trustee holds legal title to certain real property in the County of Los Angeles, State of California, as more particularly described in Exhibit A (the "Burdened Property"), in trust for Gray Davis (successor-in-office to Kenneth Cory), as Controller for the State of California and on behalf of the State of California ("California") pursuant to a Declaration of Trust dated August 29, 1983, as amended by an Amendment to Declaration of Trust dated December 11, 1984.

B. MTP-PV is the owner of certain real property in the County of Los Angeles, State of California, as more particularly described in Exhibit B (the "Benefited Property").

C. California and Summa Corporation, a Delaware corporation ("Summa") are parties to a Security Agreement dated August 29, 1984 (the "Original Security Agreement"). California and Summa entered into an Amendment to Security Agreement dated June 16, 1986 and an Amendment to Security Agreement dated February 26, 1988. Summa subsequently assigned certain of its rights under the Original Security Agreement, as amended, to

Exhibit 21 p 3
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MTP-PV, and MTP-PV assumed certain obligations of Summa under the Original Security Agreement, as amended. California, Summa and MTP-PV thereafter entered into a Third Amendment to Security Agreement of even date herewith (the "Third Amendment"). The Original Security Agreement, as amended, is hereinafter referred to as the "Security Agreement." Under the Security Agreement, MTP-PV has certain obligations (subject to the limitations set forth in the Security Agreement) to process and construct on the Burdened Property or for the benefit of the Burdened Property and the Benefited Property various roadway and other infrastructure improvements and to perform certain activities to establish development entitlements for the Burdened Property.

D. In consideration of MTP-PV's entry into the Third Amendment, in order to protect the Benefited Property and to assure the ability of MTP-PV and its affiliates to process and construct improvements on the Burdened Property as required or permitted by the Security Agreement, and for other good and valuable consideration, the receipt and adequacy of which is hereby acknowledged, MTP-PV and Trustee agree that the Burdened Property shall be subject to certain easements, upon and subject to which the Burdened Property, and each and every portion thereof, shall be held, improved and conveyed.

I. GENERAL PROVISIONS

A. Definitions

1. "Benefited Owner(s)" shall mean each and every owner, from time to time, of the Benefited Property, or any

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easement

portion thereof or interest therein, during the term of its ownership.

2. "Burdened Owner(s)" shall mean each and every owner, from time to time, of the Burdened Property, or any portion thereof or interest therein, during the term of its ownership.

3. "Development Standards" shall mean all zoning, land use, density, height, set back, design, phasing and other restrictions regarding the use and development of the Burdened Property set forth in the LUP, the LIP and the Transportation Plan, and all other similar requirements from time to time imposed by governmental agencies having jurisdiction thereover.

4. "Improvements" shall mean the Improvements defined in Paragraph 4 of the Security Agreement and the improvements described in Paragraph 6(e) of the Security Agreement, to the extent located on the Burdened Property.

5. "LIP" shall mean the Local Implementation Program consisting, inter alia, of the Playa Vista Area C Specific Plan (City of Los Angeles Ordinance No. 160,522) and the Post-Certification Coastal Development Permits Procedural Ordinance (City of Los Angeles Ordinance No. 160,524), each as amended prior to the date hereof, as the same may be further implemented by a Joint Powers Agreement respecting the same to be entered into between the City of Los Angeles and the County of Los Angeles, as each of the foregoing may be modified after the date hereof pursuant to the Stipulation or the Stipulated Judgment, and as each may otherwise be modified after the date hereof, to

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the extent such other modification(s) (a) has (have) been consented to in writing by Burdened Owner, whose consent shall not be unreasonably withheld with respect to the Improvements; and by Primary Benefited Owner or (b) is (are) otherwise permitted by the Security Agreement.

6. "LUP" shall mean Los Angeles County's Marina Del Rey/Ballona Local Coastal Program, Phase II - Land Use Plan as approved by the California Coastal Commission on December 9, 1986 and the City's Playa Vista Land Use Plan as approved by the California Coastal Commission on May 13, 1987, each as amended prior to the date hereof, as each of the foregoing may be modified after the date hereof pursuant to the Stipulation or the Stipulated Judgment, and as each may otherwise be modified after the date hereof, to the extent such other modification(s) (a) has (have) been consented to in writing by Burdened Owner, whose consent shall not be unreasonably withheld with respect to the Improvements, and by Primary Benefited Owner or (b) is (are) otherwise permitted by the Security Agreement.

7. "Playa Vista" shall mean the real property described on Exhibits A, B and C.

8. "Primary Benefited Owner" initially shall mean MTP-PV, provided that, pursuant to the provisions of Section III, another entity hereafter may become Primary Benefited Owner with respect to any or all of the rights of Primary Benefited Owner, and thereafter each reference to Primary Benefited Owner herein shall mean only the Primary Benefited Owner which has the right to enforce the specified rights of the Primary Benefited Owner,

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4 pg

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unless otherwise stated. It is understood that there may be more than one Primary Benefited Owner hereunder at any one time, but there shall be only one entity at any one time which may enforce a particular right of Primary Benefited Owner hereunder.

9. "Roadway Improvement" shall mean an Improvement that is to be used as a roadway.

10. "Stipulated Judgment" shall mean the Judgment entered pursuant to the Stipulation; it being understood that if the Stipulated Judgment does not exist or is rescinded or otherwise rendered void, the validity and enforceability of any provision of this Agreement shall not be affected thereby.

11. "Stipulation" shall mean that certain Stipulation for Entry of Judgment entered into by all, and not less than all, of the parties to that certain litigation brought by Friends of Ballona Wetlands, inter alia, in the Superior Court of the State of California, County of Los Angeles, Case No. C525 826; it being understood that if the Stipulation does not exist or is rescinded or otherwise rendered void, the validity and enforceability of any provision of this Agreement shall not be affected thereby.

12. "Transportation Plan" shall mean the Coastal Transportation Corridor Specific Plan (City of Los Angeles Ordinance No. 160,394), as modified after the date hereof by the Stipulation or the Stipulated Judgment, and as otherwise further modified after the date hereof.

13. "Trustee's Agreement" shall mean any Agreement entered into among the Trustee, MTP-PV and an affiliate of MTP-PV regarding the purchase and sale of the Burdened Property.

Exhibit 21

p 7

A 5 PLU 00417
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B. Nature of Easements. Burdened Owner hereby agrees that the Burdened Property, and each and every portion thereof, is now, and shall hereafter be, held, transferred, sold, leased, conveyed, developed, improved, maintained and occupied subject to the easements set forth in Section II, each and all of which shall be binding upon each and every Burdened Owner.

The easements granted pursuant to Section II.A.1. and Section II.A.3. are perpetual, irrevocable, non-exclusive easements in gross, with the right to grant and transfer the same pursuant to the terms hereof, which are granted to Primary Benefited Owner as personal rights. The easements granted pursuant to Section II.A.2. are appurtenant easements granted for the benefit of the Benefited Property and shall inure to the benefit of, pass with and be appurtenant to, the Benefited Property, and each and every portion thereof, and shall inure to the benefit of and be enforceable by each Benefited Owner.

C. Purposes of Easements. The purposes of the easements contained herein are to preserve the value of the Benefited Property and, upon the terms and conditions set forth below, to permit (1) the processing, construction, repair, maintenance, restoration and use of the Improvements on the Burdened Property, and (2) the replacement, repair and maintenance of any landscaping or improvements incidental thereto.

Exhibit 21 p 8
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5-00400
Easement

II. EASEMENTS

A. Grant of Easements.

1. Improvement Easements. Subject to the applicable terms and conditions contained herein, Burdened Owner hereby grants to Primary Benefited Owner, a perpetual, irrevocable, non-exclusive easement in gross, together with the right to grant and transfer the same pursuant to the terms hereof, over and right at any time to enter upon, pass over and along, and otherwise alter, improve, use, repair and maintain: (a) all or any portion of the Burdened Property, to the extent reasonably necessary for purposes of planning and processing each Improvement, provided that such easement shall remain effective only until the precise location of each Improvement has been designated in the Final Map (as defined in Paragraph 6 of the Security Agreement); and (b) that portion of the Burdened Property which constitutes the precise location of each Improvement (after the precise location of such Improvement has been so designated), to the extent reasonably necessary for purposes of the planning, processing, construction, installation, repair, maintenance and use of such Improvement. After the precise location of an Improvement has been designated in the Final Map, Burdened Owner and Primary Benefited Owner shall execute, acknowledge and record against the Burdened Property an amendment to this Agreement which shall set forth the precise description of the location of the easement for such Improvement. Subject to the applicable terms and conditions contained herein, Burdened Owner hereby grants to Primary Benefited Owner a perpetual, irrevocable, non-exclusive easement

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Exhibit 21 p9

in gross, with the right to grant and transfer the same pursuant to the terms hereof, over and right to enter upon, pass over and along, and otherwise alter, improve, use, repair and maintain the Burdened Property, at any time after the precise location of an Improvement has been designated, to the extent reasonably necessary for the purposes set forth in Section II.A.1(b), including, without limitation, for purposes of using portions of the Burdened Property temporarily for roadways and storing of equipment and materials.

2. Easement Appurtenant. Subject to the applicable terms and conditions contained herein, Burdened Owner hereby grants to Benefited Owners, for the benefit of the Benefited Property, a perpetual, irrevocable, non-exclusive, appurtenant easement over and right to enter upon and pass over and along the precise location of each Improvement at any time after the construction of such Improvement has been completed, for vehicular access, ingress and egress with respect to each Roadway Improvement, and for the use of and, if necessary, the repair, restoration and maintenance of, each Improvement.

3. Post-Dedication Easement. As provided in Section II.C., any easement or right to enter (collectively, "Easements") granted by Section II.A.1. or Section II.A.2. shall automatically terminate with respect to any Improvement upon the dedication of such Improvement to any entity described in Section II.C., provided that (a) to the extent any Improvement is dedicated but any landscaping or other improvements incidental thereto are not, Primary Benefited Owner shall continue to have a perpetual,

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5-00418
Exh. 5.1 21 p10

irrevocable, non-exclusive easement in gross, with the right to grant and transfer the same pursuant to the terms hereof, over and right at any time to enter upon and pass over and along that portion of the Burdened Property which constitutes the precise location of such Improvement, all to the extent reasonably necessary for purposes of the replacement, restoration, repair and maintenance of such incidental landscaping and other improvements and all at the expense of Primary Benefited Owner, and (b) to the extent the entity which is accepting the dedication does not assume or fulfill all obligations with respect to the Improvement being dedicated, Primary Benefited Owner shall continue to have a perpetual, irrevocable, non-exclusive easement in gross, with the right to grant and transfer the same pursuant to the terms hereof, over and right at any time to enter upon and pass over and along that portion of the Burdened Property which constitutes the precise location of such Improvement, all to the extent reasonably necessary for purposes of fulfilling any such obligation which is not so assumed or fulfilled and all at the expense of Primary Benefited Owner.

B. Commencement of Right to Use Easements.

1. Primary Benefited Owner shall have the right, at Primary Benefited Owner's sole cost and expense (without affecting Primary Benefited Owner's rights under the Security Agreement or the Improvement Fund Escrow (as defined in the Security Agreement) to offset or receive reimbursement of such costs and expenses), to use the Easements granted pursuant to

Exhibit 21 p 11
A 5 PLV 00417
5-00400
easement

Section II.A.1. and II.A.3 with respect to each Improvement only upon the approval of the location and requirements of such Improvement by all applicable governmental entities, provided that such Improvement is or would be permitted pursuant to the terms of the Security Agreement, whether or not the Security Agreement is then in full force and effect.

2. Benefited Owners shall have the right to use the Easements granted pursuant to Section II.A.2. with respect to an Improvement only upon the approval of the location and requirements of such Improvement pursuant to Section II.B.1. and the substantial completion of construction of such Improvement.

C. Public Dedication. Upon the request of Primary Benefited Owner, Burdened Owners shall join with Primary Benefited Owner in any irrevocable offer to dedicate to the City of Los Angeles or other appropriate governmental or public agency, any public or private utility, any community association, any quasi-public organization or any mutual benefit corporation, their interest in any or all Improvements (including, without limitation, all rights-of-way therefor), provided that in each such instance: (1) the City of Los Angeles or such other entity, upon acceptance of such dedication, undertakes to maintain (unless such maintenance is otherwise provided for) and operate (a) each such Improvement for the use and benefit of the public, and (b) each such Roadway Improvement as a public street and roadway; and (2) such dedication shall be subject to all matters then appearing of record. Upon the completion of the construction and dedication of all Improvements by any person or

Exhibit 21 P12
5-00-00-000
A 5 PLU00417

entity, Primary Benefited Owner and the Burdened Owner shall execute, acknowledge and record against the Burdened Property an agreement which terminates all Easements granted pursuant to section II.A.1. and Section II.A.2., except to the extent otherwise provided in Section II.A.3.

D. Conditions to Use of Easements.

1. Each Primary Benefited Owner (an "Indemnitor") shall indemnify Burdened Owners for any and all losses, expenses, damages, demands, liabilities, payments, causes of action, or other claims (including, without limitation, costs and expenses of litigation and reasonable attorneys' fees) to the extent arising from, based upon or relating to, such Indemnitor's or its authorized agents' use of the Easements set forth in this Section II. Following completion of an Improvement by an Indemnitor, such Indemnitor (a) shall leave the Burdened Property free of liens and encumbrances (except those arising in connection with any Financing District (as defined in the Trustee's Agreement) formed pursuant to the Trustee's Agreement) arising from the use of such Easements by such Indemnitor or its authorized agents in connection with such Improvement, or (b) shall promptly bond against or contest (and if any such contest is unsuccessful, shall remove before the enforcement thereof against the Burdened Property) any such existing lien or encumbrance arising from such use. All operations of any Indemnitor and its authorized agents on the Burdened Property pursuant to this Agreement shall be (i) performed in a good, professional and workmanlike manner which is in conformity with

Exhibit 21 p 13
A 5-60 ALU 41-
5-00402
Exempts Easement

January 5, 2001

California Coastal Commission
South Coast District Office
200 Oceansgate
Long Beach, CA 90802

Re: Appeal No. A-5-00-417 (Playa Vista Capital)

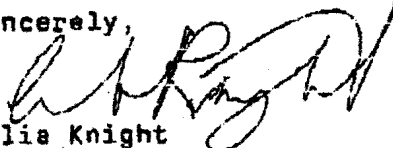
Dear People:

Irregardless of any new development in the area, the proposed improvements are ones that have been necessary for more than 20 years. The offramp from Culver Blvd. to northbound Lincoln has been unsafe and inadequate forever. The improvements have been approved twice and the City Engineer recommended approval. I trust his or her judgment.

Also, the stormwater detention basin will be a safety measure and, planted with native flora, will add to the wetlands which will be restored by Playa Capital.

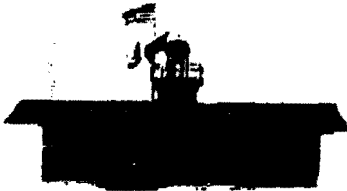
Please deny this appeal, which appears to be just another administrative impediment to the re-development of the old Hughes industrial complex by wellintentioned but misdirected persons.

Sincerely,


Celia Knight
Member - Del Rey Homeowners and Neighbors Assn.
Sierra Club
Friends of Ballona Wetlands

A 5 ~~00~~ PCU 00917
5-00902
Exhibit 25

Legal



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DEC 29 2000

CALIFORNIA
COASTAL COMMISSION

Coalition to Save the Marina Inc.
P.O. Box 9291
Marina Del Rey CA 90295
Phone: (310) 572-6477
Web Site: SaveTheMarina.Com
E-Mail: info@savethemarina.com

Page 3

12/28/2000

To: Peter Douglas Executive Director of the California Coastal Commission
From: The Coalition to Save the Marina inc.

This is a California Public Records Request

Each numbered item represents a separate and distinct public record request. Please provide access to our representatives at the Los Angeles Office.

1. Report of Sampling and Analysis of Soil Gas for Methane Phase 2 Portion of Playa Vista " CDM Project 10610-30928.R1.RPT. by Camp, Dresser and McKee dated November 2, 2000 referred to in the commission Staff Report for Appeal Number A-5-PLV-00-417 filed 10/12/2000.
2. Group Delta Consultants, "Geotechnical Investigation of Proposed Roadway Improvements for Culver Boulevard, Playa Vista Development, Los Angeles CA" dated June 9, 2000 referred to in the commission Staff Report for Appeal Number A-5-PLV-00-417 filed 10/12/2000.
3. Davis and Manson, Consulting Geologists, "An Evaluation of the Subsurface Structure of the Playa Vista Project Site and Adjacent Area, Los Angeles CA," dated November 16, 2000 referred to in the commission Staff Report for Appeal Number A-5-PLV-00-417 filed 10/12/2000.

Thank You,
John Davis Vice President
Coalition to Save the Marina inc.

*5-00402
A 5 PLV 00 417
Exhibit 23*

CITY OF LOS ANGELES

CALIFORNIA

BOARD OF FIRE COMMISSIONERS

DAVID W. FLEMING
PRESIDENT

MEL WILSON
VICE-PRESIDENT

LARRY GONZALEZ

ELIZABETH H. LOWE

CHERYL PETERSEN

LYNNE NELSON
EXECUTIVE ASSISTANT



RICHARD J. RIORDAN
MAYOR

DEPARTMENT OF FIRE
200 NORTH MAIN STREET
LOS ANGELES, CA 90012

WILLIAM R. BAMATRE
CHIEF ENGINEER
AND
GENERAL MANAGER
(213) 485-6005
<http://www.ci.la.ca.us/dept/LAFD>

Pam Emerson
Los Angeles County Area Supervisor
California Coastal Commission
200 Oceangate
Tenth Floor
Long Beach, Ca. 90802

Dear Commissioners

As you evaluate Appeal No. A-5-00-417, please take into consideration the great impact this new traffic ramp will have on improving emergency response times for paramedics and firefighters in the Marina del Rey area.

As Chief of the Los Angeles Fire Department's Battalion No. 4, which stretches from Venice to El Segundo, I can say without hesitation that the area near Lincoln and Culver Boulevards is one of the most difficult traffic challenges we face.

Because of the medians on Lincoln Boulevard and the lack of options for drivers to avoid the area, we are often delayed in our response jeopardizing our ability to provide emergency service in a timely manner.

The creation of the proposed traffic ramp at Lincoln and Culver would be beneficial for several reasons. First, it would allow existing traffic to more easily connect with Culver Boulevard and have swifter access to both the 405 and 90 freeways. This would take hundreds of vehicles off Lincoln Boulevard. Secondly, the ramp would allow our units to connect with Culver Boulevard in a more timely fashion by eliminating the current circuitous routes we are now forced to take. Finally, the new ramp is designed to be wider and safer than the current narrow and tight configuration that is difficult for many large vehicles to navigate.

Anything that enhances our response time has the possibility of saving lives and property. For that reason, and the others that I have outlined, I urge you to deny Appeal No. 5-00-417. Thank you.

Sincerely,

Gary R. Bowie
Commander, Battalion 4

5-00400
A 5-PLU 00417
Exhibit 25





LEROY D. BACA, SHERIFF

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169



January 10, 2001

RECEIVED
South Coast Region

JAN 16 2001

CALIFORNIA
COASTAL COMMISSION

California Coastal Commission
200 Oceangate, Suite #1000
Long Beach, CA 90802

Attn: Pam Emerson

Dear Commissioners:

On behalf of the Los Angeles County Sheriff's Department, I am writing to encourage the Coastal Commission to allow construction of a new traffic ramp at Lincoln and Culver Boulevards.

This is a section of roadway that has not been changed since the Marina was built more than 35 years ago. At that time, the roadway was adequate to handle the minimal traffic in the area and functioned well despite its awkward design.

Today, however, thousands of new residents and businesses in the area surrounding the Marina have made this one of the most congested areas in Los Angeles. Some of that congestion could be eliminated with the construction of a new ramp that would allow additional access to and from Lincoln Boulevard.

The new ramp configuration would also create wider lanes that would enhance safety.

I encourage the Coastal Commission to allow the construction of the new traffic ramp to begin.

Sincerely,

LEROY D. BACA, SHERIFF

Rod Lyons, Captain
Station Commander, Marina del Rey

Exhibit 24
5-00902
A 5 PLU 0091

