

LETTER NO. 167

Joe Ravetz
600 Harbor Street, #7
Venice, CA 90291

Comment 167-1

I'm a longtime resident of Los Angeles, now living in Venice, and I can see that the Playa Vista project is not only a huge mistake environmentally, but it is also putting a terrible burden on the local area. Our streets are often grid locked, and more cars are on their way if Playa Vista Phase II is approved.

I'm against the approval of Phase II of Playa Vista. It makes no sense to approve Phase II before we know the full impact of Phase I. I hope you and the L.A. Planning Dept. will consider my deeply felt antagonism to Playa Vista and vote against it if given the opportunity.

Thank you for considering residents needs over that of the developers in this crucial battle to save our coastline.

Response 167-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

There is no requirement that consideration of the Proposed Project be delayed until completion of the First Phase Playa Vista Project. A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

LETTER NO. 168

Mollie Reeves
13856 Bora Bora Way, #105C
Marina del Rey, CA 90292

Comment 168-1

I don't know much about development in Los Angeles, but I have to guess that few developers are doing as much as Playa Vista to improve situations outside their development's borders.

The Environmental Impact Report for The Village examines more than 200 intersections, plus freeways, to determine the project's impact on 100 square miles of the local and regional transportation systems. That is a huge area! Furthermore, Playa Vista is paying for new buses to encourage public transportation.

To improve our education system, the developers have adopted schools in the area, providing students with scholarships and top-notch arts programs. Within the development, four acres in the first phase have been set aside for a new public school. Between the first phases and The Village, Playa Vista will be contributing approximately \$28 million in fees to the Los Angeles Unified School District.

The parks that are already in place at Playa Vista are gorgeous, and I know The Village's parks will be just as attractive. These are also public benefits, as they will be open to everyone, not just the development's residents.

Playa Vista is doing more than its share to make the Westside a better place. Approve The Village!

Response 168-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 169

Michael A. Reifel
happyjoyousfreeindian@yahoo.com

Comment 169-1

As a resident of Los Angeles, who values and enjoys the natural beauty of our area. [sic] I implore you and your fellows to take a long and hard look at what is being attempted on the West Bluffs which directly affects the wetlands.

Response 169-1

This comment does not address the Proposed Project; rather, it is in reference to a separate project, which is considered in the Draft EIR as a related project (Related Project 24). The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 170

John Reynolds
3217 17th Street
Santa Monica, CA 90405

Comment 170-1

I am a resident of Santa Monica living in Sunset Park which is located in the southwestern sector of Santa Monica. I read part of the EIR for Phase II of the Playa Vista project and found that it was irresponsibly lacking in detail regarding the impact the project would have on street traffic on Lincoln Blvd. north of Washington Blvd. and completely ignored Santa Monica Airport operations. Where [sic] any traffic cut through traffic studies conducted for Sunset Park? If yes, what were the findings whether reported or not? If no study was conducted, why not?

Response 170-1

The commentor states that the Draft EIR was “lacking in detail regarding the impact the project would have” on Lincoln Boulevard north of Washington Boulevard. In fact, the traffic study analyzed all signalized intersections along Lincoln Boulevard between Jefferson Boulevard and Venice Boulevard, and all arterial intersections north of Venice Boulevard to the I-10 Freeway. A total of seven intersections along Lincoln Boulevard north of Washington Boulevard were analyzed: Lincoln Boulevard/Venice Boulevard, Lincoln Boulevard/Rose Avenue, Lincoln Boulevard/Ocean Park Boulevard, Lincoln Boulevard/Pico Boulevard, Lincoln Boulevard/I-10 eastbound ramps, Lincoln Boulevard/I-10 westbound ramps, and Lincoln Boulevard/Wilshire Boulevard. The Draft EIR determined that the Proposed Project would have a significant impact at Lincoln Boulevard/Venice Boulevard before mitigation, but would not have significant impacts at the intersections north of Venice Boulevard. With implementation of the proposed mitigation measures, all significant impacts along Lincoln Boulevard would be mitigated to a less-than-significant level. See Figure 65 on page 809 of the Draft EIR for a map illustrating all of the study intersections. Please see Topical Response TR-7, Study Intersections, for more detail.

Potential impacts from the Proposed Project on residential streets are addressed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 872. The Draft EIR concludes that the Proposed Project will not have a significant impact on the neighborhood streets in the Sunset Park area referenced in the comment. Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, which provides a more detailed discussion of the neighborhood traffic impact analysis.

Comment 170-2

I am concerned that Santa Monica Airport traffic will increase as a result of the build out of this project. I didn't see any evidence of SMO airport operations mentioned in the report. What is the estimated increased airport traffic from Playa Vista I and II?

Response 170-2

Santa Monica Airport has no commercial service, so a general increase in population at the Proposed Project will not necessarily lead to any increase in use at the airport. To the extent that a general increase in population at the Proposed Project will lead to increased private general aviation traffic at the airport, there is no reasonable way of measuring the prospect of private use of civil aviation. The airport imposes flight and noise restrictions which would apply to any resident at the Proposed Project, such as the Single Event Noise Exposure Level (SENEL) restriction contained in Section 10.04.04.060 of the Santa Monica Municipal Code. There are also curfew and other restrictions described in Chapter 10.04 of the Municipal Code. Uses and limitations upon traffic at the airport are within the jurisdiction of the Federal Aviation Administration and, to some extent, the City of Santa Monica.

Comment 170-3

I urge you to have the developers do a more thorough job of assessing the impact their construction will have on Sunset Park and Santa Monica Airport and report these finding [*sic*] to the City of Santa Monica and the neighborhood associations that work so closely with the city to protect our quality of life.

Response 170-3

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. Please refer to Responses 170-1 and 170-2.

LETTER NO. 171

Mary Ballou Richert
2200 Vanderbilt Lane, #22
Redondo Beach, CA 90278

Comment 171-1

I apologize for the last minute support letter for The Village at Playa Vista. However, I believe that this deveopment [sic] will be a great asset to the community. I also believe that this development has been very well planned to work with the surrounding area, especially considering the environmental issues which encompass the entire Playa Vista project.

If you need any additional comments, please feel free to contact me at 310-664-7920. Thank you.

Response 171-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 172

Riggs Place Neighbors
Mark S. Ludwig
Mary Jane Ludwig
6373 Riggs Place
Westchester, CA 90045

Back B. Weinger
Alyce Weinger
6367 Riggs Place
Westchester, CA 90045

Herman Eisen
Marge Eisen
6376 Riggs Place
Westchester, CA 90045

Comment 172-1

We are writing as long-time residents of Westchester to express our concerns and opposition to the approval of the Playa Vista Phase II Development as proposed. Our concerns are as follows:

1) With the increase in traffic that this proposed project will undoubtedly generate, we believe that traffic mobility in the entire area surrounding the project will be greatly compromised. In fact, intersections within a 3-5 mile radius of Playa Vista will become completely gridlocked. “Traffic mobility” has already become an oxymoron when used to describe many of the area’s streets, intersections and freeways.

Response 172-1

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study areas described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This

new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 172-2

2) Helicopter flights to and from the project should be limited to only [e]mergency situations. Should this project go forward as proposed, and street traffic becomes the nightmare we believe it will, the temptation to utilize alternative means of travel will be quite appealing to busy executives and others with the financial wherewithal to do so. Air traffic noise generated by existing helicopter flights is already a nuisance.

With any increased air traffic by helicopters, ambient noise levels will rise substantially. This is unacceptable. We could also expect a result to be further degradation of our air quality, and will have a profound impact on our quiet enjoyment of our homes.

Response 172-2

This comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

Section 15002 of the State CEQA Guidelines states that the basic purpose of CEQA is to inform governmental decision-makers and the public about the potential, significant environmental effects of a proposed project. No changes to heliport operations are proposed with implementation of the Village at Playa Vista, with the exception of the elimination of one heliport within the boundaries of the Proposed Project. Therefore, there would not be any impacts from heliport operations as a result of the Proposed Project.

Subsection 2.2.5 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on pages 715-717 identifies two heliports currently permitted within the adjacent Campus portion of the previously approved Playa Vista First Phase Project. The Campus is envisioned to provide corporate headquarters-type facilities; as such, one or both of these heliports could become operational in the future to serve corporate executives. The impacts associated with opening one or more of the heliports at Playa Vista were addressed in the 1995 approvals of the Campus at Playa Vista, and are not an issue under consideration at this time. The study performed at that time, "Helistop Noise Study for Playa Vista, has been included in the Appendices of the Final EIR.

There is no evidence (i.e., facts, reasonable assumptions predicated upon facts, or expert opinion supported by facts) to support a claim that buildout of the Proposed Project would result in an

increase in helicopter use. Any attempt to analyze such a relationship would be speculative. Pursuant to CEQA Guidelines Section 15145, “[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.” Given the speculative nature of this particular issue and its potential impacts, no further discussion of this issue is required.

Comment 172-3

3) We anticipate significant drains on our area’s infrastructure, despite Playa Vista’s proposed mitigations.

Response 172-3

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers prior to any approval action on the Project.

The Draft EIR provides a detailed analysis of the potential impacts of the Proposed Project on infrastructure in Section IV.C.(1), Hydrology, Section IV.M, Energy Consumption, and Section IV.N, Utilities. As indicated therein, with mitigation, impacts would be less than significant.

Comment 172-4

4) As we understand the proposed project, many views will be greatly compromised, and if not obstructed entirely by the buildings themselves, prime city and ocean views could be reduced to front-row views of rooftop support equipment such as A/C units, generators, helicopter pads, etc. Blufftop views should be preserved in their entirety, at any and all costs.

Response 172-4

The impact on views from bluff top locations is analyzed in Subsection 3.4.2.2 of Section IV.O, Visual Qualities (Aesthetics and Views), of the Draft EIR on page 1174. As indicated, maximum building heights would be approximately 28 feet below the top of the bluffs, and there would be no impacts on mid to far-range views (city and ocean views). Impacts would be less than significant.

Comment 172-5

While there are numerous other issues troubling us, lack of time is precluding us from commenting on those in this communication. However, we hereby request that Playa Vista Phase II not be approved as currently drafted.

Thank you for your time and your consideration of our concerns.

Response 172-5

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 173

Ernest Roberts
1944 Virginia Road
Los Angeles, CA 90016

Comment 173-1

I am writing to express my support for the approval of the Village at Playa Vista. Our city desperately needs to foster communities in which residents can live and access retail and services within the same area. Playa Vista has proven that it is committed to providing its residents with beautiful, efficient and environmentally friendly living spaces, and will continue to pursue the same policy in its next phase--the Village.

One of the attractive elements of becoming part of the Playa Vista community is the expectation that restaurants, retail shopping and grocery and other service outlets would be available within a short distance. It is my hope that the City will approve the Village, and complete this model project.

Response 173-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 174

Eva Roberts
4050 Marcase Avenue
Mar Vista, CA 90066

Comment 174-1

I am horrified at the prospect of all the new cars on the west side that playa vista will generate. Please don't ruin our lives with so much pollution, noise, and overcrowded streets.

Response 174-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Pursuant to State CEQA Guidelines, the Draft EIR analyzes the impacts of the Proposed Project and where necessary proposes mitigation measures to address the Project's impacts. Potential impacts on air quality associated with the Proposed Project are addressed in Section IV.B of the Draft EIR, beginning on page 270. Potential noise impacts associated with the Proposed Project are addressed in Section IV.E, Noise, of the Draft EIR, beginning on page 553. Potential traffic impacts associated with the Proposed Project are addressed in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 798.

LETTER NO. 175

Phil Roberts
891 Washington Street
El Segundo, CA 90245

Comment 175-1

When planning and city officials evaluate the Village at Playa Vista, I hope they will consider what the site looks like now. Yes, it is open space, but it is far from pristine and scenic. The land has been home over the years to ranching, oil and aerospace operations. In recent years it has become an eyesore in the community, a vast expanse of cracked asphalt, weeds and abandoned buildings.

Building the Village will make good use of the land. Playa Vista has plans for an attractive, architecturally diverse, balanced community that respects the environment and the surrounding area. Approve the Village!

Response 175-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 176

Walter Roessner
3651 Barry Avenue
Los Angeles, CA 90066

Comment 176-1

I am a resident of Mar Vista, living near Venice and Inglewood Blvds. My concern about traffic mitigation in the present situation of Phase 1 is that traffic in this area, especially along Inglewood Blvd, a narrow artery that comes north from Jefferson Blvd, is already showing signs of increased traffic from Venice to Palms Blvd. And Phase 1 is not yet finished nor fully occupied.

I think that the Playa Vista builder's claims for Phase 2 that traffic in residential areas such as this will be negligible are bogus.

Please make them re-evaluate their traffic mitigation plans, or do away with Phase 2 altogether.

Response 176-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts.

The commentator raises comments relating to the existing traffic conditions on Inglewood Boulevard. Such traffic would be included within the existing operating conditions presented in Table 115 of the Draft EIR, on page 812.

The Draft EIR contains an analysis of potential neighborhood impacts that could be caused by project traffic in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872. As discussed in Subsection 3.4.7, the Proposed Project would not result in any significant impacts on neighborhood traffic in the Mar Vista area.

LETTER NO. 177

Michael & Kathleen Rogers
3624 Inglewood Boulevard
Los Angeles, CA 90066

Comment 177-1

We respectfully submit the following comments regarding the proposed Phase 2 of the Playa Vista development. The focus of our comments is on traffic.

1. Phased Development—Phase 2 of Playa Vista should not be approved before Phase 1 is constructed and occupied and its true traffic implications are known. It is not uncommon for large developments to be required to develop in phases, so that their impacts can be monitored and assessed post-occupancy, and unsuspected consequences, such as more traffic than anticipated, can be addressed through either new mitigation, revised mitigation or reduced development among future phases. One nearby development that has their ability to develop future phases linked with the proven success of traffic mitigation is the Howard Hughes Center. This should also be the case here.

Response 177-1

The Draft EIR takes into account development of the Playa Vista First Phase Project as part of the 2010 baseline condition. The Draft EIR's traffic analysis uses a nationally recognized transportation model to assess potential traffic impacts. This model was calibrated taking into account SCAG regional projections and a list of related projects provided by jurisdictions within the study area, including the Playa Vista First Phase Project. Please see Topical Responses TR-1, Playa Vista Transportation Model, and TR-9, Traffic: First Phase Project (VTTM 49104) Condition No. 116, on pages 451 and 470, above, for a more detailed discussion of these issues.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 177-2

Ongoing Monitoring—As a condition of Phase 2 development, both Phases 1 and 2 should be required to conduct and submit to the LADOT traffic monitoring reports at least twice per year, on an ongoing basis. The monitoring should be based on established vehicle trip limits at the driveways. This will enable:

2.a. Assessment as to whether project vehicle trips are at their projected, post-mitigation level, or if new remedies are needed, including reduced development.

2.a.1. People are skeptical, for example, of the ability of new bus seats to address significant traffic impacts. This skepticism has merit given the lack of well-connected transit service in the project area. It is of even greater concern if this mitigation is based on the changed behavior of others outside of the project to leave their cars behind and ride public transit. The project should only be able to claim credit for transit usage among project occupants, the success of which could be determined through broader monitoring efforts of vehicle trip limits and driveway counts.

Vehicle trip limits should be established for the AM peak hour, PM peak hour, and daily total. Again, this is not an uncommon requirement for new developments, and we believe UCLA and Fox Studios are two such examples.

Response 177-2

The analysis in the Draft EIR used methodologies consistent with City of Los Angeles procedures to estimate the effectiveness of the mitigation measures. In accordance with CEQA, the Draft EIR analyzes the potential significant impacts of the Proposed Project and identifies feasible mitigation measures to mitigate those significant impacts. The ongoing monitoring suggested by the Commentor is not necessary to mitigate any significant impact identified in the Draft EIR. The ITE trip generation rates used in the Draft EIR are the industry standard rates used by transportation agencies throughout the nation, including the City and County of Los Angeles, the City of Culver City, and numerous other cities throughout Southern California to estimate trip generation for projects. The City of Los Angeles does not normally require subsequent investigations or verification studies. Rather, the goal is to use reliable information to assess the Proposed Project's impacts prior to consideration of the Proposed Project by decision-makers.

The proposed transit enhancement mitigation measures are designed both for use by Playa Vista residents and employees, and to meet the existing and future demand of transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the proposed mitigation would be effective to reduce potentially significant impacts to less than significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections. For a more detailed discussion of the effectiveness of the transit mitigation measures, please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, above.

Comment 177-3

3. Residential Street Analysis—The impact of Phase 2 development on residential streets to the north of the project should be carefully analyzed. A similar analysis should also be conducted of the completed and occupied Phase 1 development, based on actual project trip generation and distributions before Phase 2 is approved (Refer to comment 1). Of particular concern to us and our neighbors is the impact to the residential portion of Inglewood Boulevard. Although Inglewood Boulevard is a designated secondary highway northward from Playa Vista to Venice

Boulevard, it is a residential street north of Venice Boulevard. The residential portion of Inglewood Boulevard is already known to experience spill over traffic among motorists attempting to bypass congestion on Centinela and on the I-405 freeway. How is it expected that residents and visitors of Playa Vista will behave any differently, especially with driveways that open out onto Centinela and at Inglewood Boulevard? In approving both Phase 1 and 2 of Playa Vista, the City and applicant have a responsibility to protect residential streets such as Inglewood Boulevard from significant traffic impacts, and to conduct ongoing monitoring counts to this end (e.g., project driveway and distribution counts in conjunction with residential street counts that are compared to pre-development baseline volumes).

Response 177-3

Potential impacts from the Proposed Project on residential streets are addressed in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872. The Draft EIR concludes that the Proposed Project will not have a significant impact on cut-through neighborhood traffic in the area referenced in the comment. Please See Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, above.

With respect to the comments concerning the Playa Vista First Phase Project, it should be noted that the traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/ Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area. Please see Topical Response TR-3, Related Projects, on page 453 above, for additional information.

Comment 177-4

4. Neighborhood Traffic Protection Fund—The applicant should be required to establish a neighborhood protection fund for purposes of financing mitigation measures to protect residential streets from expected or later identified traffic spill over caused by Phase 1 and Phase 2 of the project.

Thank you for your attention to this matter and your consideration of our concerns.

Response 177-4

A neighborhood traffic impact analysis was conducted as part of the analysis of potential traffic impacts for the Proposed Project; the findings of this analysis and proposed mitigation can be found in Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 872 and on page 903. Please see Topical Response TR-5, Neighborhood Traffic Impacts, on page 458, above.

The LADOT Assessment Letter (Appendix K-1, page 7) states that funds would be deposited by the project into a LADOT-managed account for implementation of neighborhood traffic management measures. In the event any unforeseen neighborhood traffic intrusion problems are reported after Project occupancy, LADOT will investigate the complaints and, if it is determined that the cut-through problem is attributed to the Project, LADOT will work with the affected residents, the local City Council office, homeowner's groups, and traffic engineering consultants, to design a Neighborhood Traffic Management Plan to address the items of concern. If the traffic intrusion is determined to be unrelated to the Project, the neighborhood could still work with LADOT to develop a Neighborhood Traffic Plan funded through other means.

LETTER NO. 178

Sara D. Roos
3748 Mountain View Avenue
Los Angeles, CA 90066

Comment 178-1

The impact of the Play Vista proposal will be enormous on the residents of Mar Vista, where I live with my family. Our streets are currently overloaded beyond the point of safety—noise, congestion, [and] pollution impacts are currently nearly unbearable. Adding thousands and thousands more trips will impose a worsening in the quality of life here that is hard to contemplate.

Ignoring the impacts of this proposal on our community is unconscionable. In fact, the proposal itself is unconscionable. I don't know how to put a nicer face on this—it's just a stinker of a plan put forth by similarly handicapped individuals; it's hard to know what to object to first.

But for starters, the traffic will be an enormous problem. Building such a behemoth [*sic*] city with no way in or out is the stuff that strange fiction is made of. Until Los Angeles' infrastructure can properly support this colossus, approval for its existence **must** be denied!

Response 178-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of noise in Section IV.E, Noise on page 553, and a detailed analysis of air pollution in Section IV.B, Air Quality on page 270. Also, see Sections II.15, II.8, and II.4, respectively, of the Final EIR for corrections and additions to these sections.

LETTER NO. 179

Lee & Marie Roozen and family
7420 Danfield Avenue
Los Angeles, CA 90045

Comment 179-1

Please stop the notorious Phase 2 development in Playa Vista. Even before Phase 1 in Playa Vista, the traffic and air pollution was horrific, choking our freeways, Lincoln Blvd., noise and air pollution with 100,000 LAX car trips per day without even considering all the other traffic. Can you imagine Phase 1 and 2 adding 70,000 more car trips per day? This will render yours [sic] and my communities a much less desirable place to live and will affect traffic for many miles around Playa Vista and LAX. The comment period ends soon so please help our communities as soon as possible and add your voice to opposing Phase 2. Traffic from Phase 1 is just starting the pain right now because it's [sic] occupancy is low and getting started. Also, there is danger from explosion, earthquake and fire due to failure of gas mitigation systems. You and we L.A. City taxpayers could be held legally liable for millions of dollars in damages to persons and property. Please stop this environmental disaster in the name of quick and large profits to developers who can greatly influence people in government who are supposed to represent all interests of society. Please reply to Lee and Marie Roozen at www.Marie.roozen@ngc.com [sic].

Response 179-1

A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, a detailed analysis of noise in Section IV.E, Noise on page 553, and a detailed analysis of air pollution in Section IV.B, Air Quality on page 270.

Section IV.E, Noise, identifies a short-term significant impact that would occur during Project construction. Noise impacts from Project operations would be less than significant.

Section IV.B identifies short-term significant construction impacts as well significant impact from Project operations on regional air quality emissions.

A detailed discussion regarding methane is provided in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 700.

It is speculative to assume that “...there is danger from explosion, earthquake and fire due to failure of gas mitigation systems.” Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 711 and 712, discusses the conclusions reached by the CLA Report regarding the adequacy of the methane mitigation system being used at the adjacent Playa Vista First Phase Project. Page 738 of the Draft EIR also addresses in detail the methane safety system for the long-term operation of the Proposed Project. All individual components of the methane mitigation systems currently under consideration for the Proposed Project site are recognized as approved means of methane mitigation by City of Los Angeles Department of Building and Safety (LADBS) and the City of Los Angeles Fire Department (LAFD). Nearly all components have also been used at other sites throughout Southern California. The specific design elements of the methane requirements shall be subject to the review and approval of LADBS in consultation with the LAFD. As described in Appendix J-14 of the Draft EIR, the building mitigation systems are to be maintained and serviced in accordance with LAFD approved protocols. The testing and servicing of the systems is to be performed by a person approved by the LAFD. The approved protocols require that testing and annual maintenance reports are filed with the LAFD. As described under Subsection 4.0 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 738, prior to issuance of a building permit for individual projects within the Proposed Project site, a methane safety plan shall be submitted to LADBS. The methane mitigation systems in the adjacent Playa Vista First Phase Project site have been monitored and maintained pursuant to the protocols set by LADBS and the LAFD. Reports of such monitoring and maintenance are submitted to LADBS and the LAFD.

See also Sections II.4, II.8, and II.13, Corrections and Additions, of the Final EIR.

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

LETTER NO. 180

Nancy Ruben
NancyRuben@adelphia.net

Comment 180-1

I am writing to protest the Playa Vista development. I believe that this development will seriously compromise quality of life for all of those living in West L.A. The traffic issues and quality of air problems that will result from this development will be disastrous.

Response 180-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. Potential impacts on air quality associated with the Proposed Project are addressed in Section IV.B, Air Quality, of the Draft EIR, beginning on page 270. Potential traffic impacts associated with the Proposed Project are addressed in Section IV.K.(1) of the Draft EIR, beginning on page 798. Also, see Sections II.4 and II.15, Corrections and Additions, of the Final EIR.

LETTER NO. 181

Bonnie Sachs, ASID • CID
Certified Interior Designer
311 Bora Bora Way, Suite 305
Marina del Rey, CA 90292

Comment 181-1

The Draft EIR for The Village identifies plants and wildlife on the property and examines the project's potential impact on them. The report concludes that, with proper measures, The Village will have no significant impacts on plants and wildlife. That is excellent news, but not surprising given the property is an old industrial area that included an airplane runway.

In fact, the overall impact of the Village project on habitat will be beneficial. Currently, the site is a jumble of weeds, cracked pavement, dirt and gravel. The Village plan is expected to add 10 acres of improved habitat for plants and wildlife, and connect habitat areas that are currently fragmented.

On the Westchester Bluffs, rising from the site, the project will be responsible for replacing 5 acres of non-native grasses and ice-plant within the project boundaries with native coastal sage scrub habitat.

Completing the final segment of the riparian corridor will also benefit the excellent natural stormwater treatment program at Playa Vista. This community is a model for others to learn from, but the vision cannot be achieved with The Village.

I look forward to participating in the public hearing process and encouraging the City to approve this important development.

Response 181-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 182

Caroline R. Salter
5625 Crescent Park West, #220
Playa Vista, CA 90094

Comment 182-1

I know very little about the public process and how new housing developments are approved in Los Angeles; however, I know what a good neighborhood is. You can feel it. You can sense it. Walking through the community, you just know it is a good neighborhood

That is how I feel when I walk through Playa Vista. People actually talk to each other here. The parks are all within walking distance. And there is a real feeling of camaraderie among those of us who live here.

The Village at Playa Vista will do even more to solidify our place as one of Los Angeles' great neighborhoods. We are all waiting for the day when we can walk to the dry cleaner or stroll to the barber without fighting traffic.

I am hopeful that The Village will move quickly through the city approval process so that we can continue our evolution and growth as a great neighborhood.

Response 182-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 183

Alex Schub
3670 Mountain View Avenue
Los Angeles, CA 90066-3129

Comment 183-1

I am writing today to urge you to support Playa Vista as a model of urban development in our city.

Unlike many developers, Playa Vista did not develop its 1,087-acre site piecemeal. Left to the devices of lesser developers, we would have been saddled with apartment complexes here and strip malls there, none of which would have been built in concert with each other. This piecemeal development is what has created the disjointed and hodgepodge development we see in many areas of Los Angeles.

To its credit, Playa Vista has weathered the storm of attacks that you might expect would be drawn to a project so large. Through it all, Playa Vista has continued to focus on its mission--to create a comprehensive development that is well thought out and fits seamlessly together. They have spent untold years making sure each kind of housing works well next to another and making certain that each park, library and other amenity fits into the community well.

Furthermore, Playa Vista has already demonstrated through various charitable activities and sponsorships that it is a good neighbor and both a generous and active participant in our community.

Finally, Playa Vista has maximized its open space. With the construction of The Village, 70 percent of the project will be open space and The Village alone includes five new parks.

Perhaps it is the quixotic nature of the Luddites opposed to Playa Vista that causes them maintain their opposition. But theirs is not a reasonable nor reasoned battle. Playa Vista represents exactly the kind of development the City of Los Angeles should support and encourage. It is a precedent that everyone should follow. Thank you.

Response 183-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 184

Roberta Sergant
4313 Mentone
Culver City, CA 90232-3444

Comment 184-1

I am trying to register my opposition to the continuation of the Playa Vista Project. My home and work is in Culver City and I already feel very threatened by the existing development. Our main thoroughfares are now backing up at every signal. Overland and Braddock, near where I live are overflowing. Local citizens are trying to protect their residential areas by having more speed bumps installed, thus pushing more traffic to the main roads.

I teach in CC and have been very concerned about the absence of a school for the kids of Playa Vista. Our school is at full capacity and we have a waiting list of over 100 in September. I have read about how the P.V. kids will attend 5 local schools, but these will NOT be in walking distance, so that means more traffic from parents or buses or both.

Response 184-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1) of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798 and in Appendix K-2. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response No. TR-1, Playa Vista Transportation Model, on page 445, above.

Section IV.L.(3) on page 997 of the Draft EIR analyzes the Project's potential impacts on public schools. The Los Angeles Unified School District (LAUSD) has established attendance boundaries for each of its schools. Based on information provided by the LAUSD, the Project site is currently located within the attendance boundaries of Playa del Rey Elementary School, Marina del Rey Middle School and Venice High School. These are the schools that would accommodate the Project's school age children, notwithstanding inter-District transfers. While inter-District transfers are possible, they account for a very small percentage of the students attending any particular school. As such, schools other than the three noted above are not anticipated to be needed to accommodate the public school students generated by the Proposed Project.

Comment 184-2

The design of the existing bldgs may be lovely inside, but it is horrendous [sic] for those of us who live outside the fortress. Indeed, the first development is a nightmare... it looks like a high security [sic] prison or future "project." It is dreary, no more than a yard or so of "yard" standing formidably over Jefferson and Lincoln Blvd like an ominous threat, more than a neighbor.

I urge the powers who be to stop further development of Playa Vista. Let's create some more parks for kids to play in, perhaps one school, and that is that. NO MORE DEVELOPMENT. My students and I already inhale enough soot and black deposits to have several of my asthmatics out for extended absences and/or stays in the hospital.

Response 184-2

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR includes a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148, and a detailed analysis of air pollution impacts in Section IV.B, Air Quality on page 270.

LETTER NO. 185

Linda Shafritz
6128 West 75th Place
Los Angeles, CA 90045

Comment 185-1

After seeing how much the Playa Vista Project has changed for the better over the years, I cannot imagine anyone who is not in favor of this project continuing forward.

It was not that long ago that there were office buildings and hotels planned for the wetlands and a whole new finger to the marina that would have destroyed some of the last remaining open space on the Westside. It would have been a giant business area, like Century City.

Today's Playa Vista is a smaller and more responsible development that addresses everything the community has asked for: protecting the area west of Lincoln Boulevard as open space, new parks throughout the residential area, scaling down the commercial portion of the project, and providing some cute shopping and dining places.

The Village at Playa Vista will have opportunities for all the area's residents to enjoy, and benefit from. I urge the City of Los Angeles to approve The Village at Playa Vista and its environmental impact report. My husband and I have lived one half mile up the hill, in Westchester, for 22 years and raised two children there. If I am in support of this project, who wouldn't be?

Response 185-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 186

Diane Shapiro
5701 South Kiyot Way, #3
Playa Vista, CA 90094

Comment 186-1

I am sure that you are receiving many letters about Playa Vista and The Village, but let me be very blunt about the importance of approving the shops and restaurants that make up The Village. The Village is why many of us moved to Playa Vista in the first place.

We were promised a lifestyle where we could walk to work, walk to a marsh teeming with birds and wildlife and walk to the local market. So far, we know that at least two of those things will be a reality. The third is up to you and the City of Los Angeles.

Walking to the local market and to other neighborhood shops is important to every resident of Playa Vista and should be important to the City Council as well. Getting us off the streets benefits everyone who drives in the surrounding community, and being able to walk to the market is tremendously appealing to those of us who will be able to it.

We waited a long time to live at Playa and we hope you will support our community. We are not asking for much.

The Village is a win-win proposition for everyone.

Response 186-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 187

Stephen E. Shepherd
Richard Moon & Associates
5959 West Century Boulevard, Suite 950
Los Angeles, CA 90045-6517

Comment 187-1

I am writing regarding the developments at Playa Vista in West Los Angeles. I strongly support their current development plans. Not only will The Village at Playa Vista greatly enhance the difficult housing shortage issues in West Los Angeles, but also it considerably enhances the contribution and beauty of the Playa Vista community to Westchester. In addition, it will continue enhancing the local business community, which has greatly suffered in the aftermath of September 11th.

With residential occupancy, The Village at Playa Vista will be a unique community where people can live where they work. They can take electric shuttles or walk to cafes, markets and bookstores without ever venturing onto the surrounding city streets. What is more, approval of The Village will mean that the natural habitat restoration along the base of the Westchester Bluffs will be completed as well. The balancing of the development on the environment, meeting the needs of the community, and revitalizing the dead ecological area of Balloon Creek and the Bluffs add immeasurable value to the community. No other private developer or government agency was willing to take on this major perpetual restoration of the environment damage from prior owners of the properties.

The Village is clearly the missing link that will unite the residential area already under construction near Lincoln and Jefferson with the commercial area at the far east end of the project.

I support The Village and so do my friends and neighbors. We look forward to seeing it built as soon as possible. I appreciate your agency diligence in community input to your evaluation of the outstanding enhancement to West Los Angeles.

Response 187- 1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 188

John Sheppard

Comment 188-1

Our office has followed the project from its early stages. We have met with developers, local community activists, environmentalists and impacted staff. Because the project has been downsized and there has been adequate notice of issues and changes as well as participation from all interested parties, there are no major concerns that I would make comment on.

The EIR seems to reflect the said inputs.

We do however, stress that the developer continues to support recommendations made by the City's Sanitation Bureau and the Department of Transportation.

Recommendations like the development and maintenance of the fresh water marsh, associated streams and the use of best management practices as each phase is developed should be observed and delivered as agreed upon.

Maintenance of the existing and planned transportation infrastructure and the developers willingness and ability to address and mitigate unforeseen [*sic*] traffic patterns/problems that result from or are associated with the projects development and or use must be observed and delivered.

Response 188-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 189

Mickey Shockley
12460 Lucile St.
Los Angeles, CA 90066

Comment 189-1

I have lived in the immediate area of Centinela and Jefferson Blvds. since 1954. I have seen the area change from quiet and and [sic] peaceful to noisey [sic], smelly, and hectic these past 50 years. The major reason TRAFFIC and its [sic] just the beginning!!!!

I do not accept the statement from Playa Vista that “the people that will live here will work here in Playa Vista, and will not be driving to and from their jobs ... Wrong! ... If they work in Santa Monica, Beverly Hills, Westwood or where ever, they will drive and contribute to the traffic. Californian’s [sic] drive, no matter where they live!

Response 189-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As shown on Figure 71 on page 861 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, the majority of the project trips have been assigned to the external roadway network, their impacts analyzed and mitigation measures proposed and evaluated as part of the Draft EIR analysis. The internal trips were assigned to the internal roadway system being constructed as part of the Proposed Project. Approximately 3.9 percent and 2.7 percent of the total A.M. and P.M. peak-hour trips, respectively, would be internal trips within the Village at Playa Vista site.

Comment 189-2

Howard Hughes would have saved the hanger [sic] of the Spruce Goose for a museum and developed a park beyond all others in Southern California. It would have been world renowned. His name would be praised for saving this huge parcel of prestine [sic] land for all to enjoy, had he lived. A park instead of Playa Vista: Open land!

It can still be a tremendous park if Playa Vista will forfeit some of their Village, and Business Section. Playing fields and even build an Olympic size swimming pool, where children and adults can learn to swim, and swimming competitions can be held. Water safety is a must for all, especially Californians. I request that a swimming facility be available for the public.

Response 189-2

For clarification, the Spruce Goose building (Building No. 15) is part of the Campus at Playa Vista, which is part of the First Phase Project. The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 189-3

With a park there would not be as much traffic daily, as there will be with additional office buildings and the Village. The entrance to Playa Vista at Jefferson and Centinela with wide lanes and plenty of room is acceptable, however Centinela cannot handle the tremendous overload of traffic. There must be other streets constructed to handle all the traffic that will be coming and going into the Playa Vista area. Until they are established and constructed, the building of additional facilities in Playa Vista should be discontinued.

Response 189-3

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As shown in Figure 4 of Section II.B., Project Characteristics, of the Draft EIR on page 155, the Village at Playa Vista will include a grid network of internal streets including Bluff Creek Drive (a secondary arterial), Millennium, Westlawn Avenue, McConell Avenue, and Second Street within the site.

Comment 189-4

RELATED TO PLAYA VISTA AND THE INCREASE OF TRAFFIC TRAFFIC [*sic*]
PROBLEMS IN THE IMMEDIATE AREA OF CENTINELA, JEFFERSON, AND
GROSVENOR BLVDS. SUGGESTIONS TO BE CONSIDERED.

PROBLEMS; SPEEDING-CUTTING THROUGH SIDE STREETS & ALLEYS
TO AVOID THE CORNER OF CENTINELA AND JEFFERSON BLVDS.

CENTINELA:

Speed limit signs of 35 mph Southbound on Centinela. The one sign that is posted is behind a telephone pole. Needs to be moved south for better observation. Needs enforcement. Speed limit sign 35 mph going North. The speed limit sign 25 mph school zone is ignored. Cars, trucks and semi trucks race thru to beat the signal at Lucile St. This signal needs to be longer for people to cross the street, it is very dangerous for school children and seniors.

JUNIETTE:

West side of Juniette at Centinela needs street painted stating "keep clear" so cars can exit Juniette going North or South. Vehicles getting gas at the corner use the alley to exit. Note: We

had a sign posted at the alley and Juniette “Do Not Enter One Way” which has helped stop the speeding through out the alleyways parallel to Centinela (West side), and has discouraged cut-threw [sic] cars and trucks.

GROSVENOR BLVD:

Needed, a Blvd. [s]top sign ON Grosvenor at Beatrice St. Speeding cars on Grosvenor--Posted 35 mph North bound prior to the residential homes, and Southbound to slow speeding cars to Jefferson.

WESTLAWN:

Needs to be widened and have two left turning lanes on to Jefferson to move employee traffic out of industrial area.

ALLA ROAD:

There must be other streets to unload traffic coming and going into the Playa Vista area other than Centinela and Lincoln Blvd. Playa Vista has known this for years and has ignored it. In dire emergencies the streets are not developed to handle a major problem. A bridge over the Ballona Creek is the only access available at Alla Road. Beethoven and McConnell are the only other streets if a bridge could be constructed in those areas.

Response 189-4

All of the suggestions stated in this comment are current operational issues that are handled by the LADOT’s District Operations office. The comment is noted and will be forwarded to the LADOT’s District Operations office in West Los Angeles for their review and consideration.

Comment 189-5

SHORTCUTS AND ALLEYWAYS--ARE BEING USED TO AVOID THE CORNER OF CENTINELA AND JEFFERSON BLVDS.

In Los Angeles County -The alleyway that runs parallel to Centinela North and South is a cut thru for many vehicles. There have been numerous accidents at the alley and Lucile St. which is a signal street. Homeowners need Blvd. Stops at the alleyways and their streets to make a safe crossing to Centinela. Blvd. Stop signs on both the North and South sides of the alley on Beatrice, Lucile, Aneta, and Hammack Sts. in order to stop the speedway and shortcut drivers.

Knowing what the future plan of the area was going to become, the homeowners in this section of Los Angeles County, paid to have their streets all Cul-de-saced [sic] in 1985, completed in 1988. Therefore we have no through traffic. But we do have people that do not pay attention to the signs, speed down our streets thinking they can get through, then speed back out. There are truck drivers that ignore signs even load limit signs. Lucile Street is traveled more because it is a signal street. Our request is: On the overhanging sign that states its [sic] Lucile St we want an additional sign that says NO EXIT OR NO OUTLET on both sides so that drivers see it BEFORE they turn left or right into out [sic] street, and adding an arrow might help too. These

cars, trucks, and semi trucks, cement trucks, etc. are all trying to avoid the hectic corner of Centinela and Jefferson. More traffic into Playa Vista is effecting [sic] our lives, and it is only going to get worse. So correct it now! Signs are also needed on the street name signs for all four street [sic] , which does include Juniette St. I am enclosing a drawing of what our area needs.

Juniette street West bound, is used, then over the entry to the church, over the parking lot and down to the alleyway in the back of the apartments on Jefferson. Cars and trucks speed up and down this alley to gain access [sic] to the industrial area to the West, and turn on Grosvenor. All this to avoid the corner of Centinela and Jefferson, and the entrance to Playa Vista in the near future.

Many years ago when Playa Vista first began, I attended a meeting that was to inform the local residents of what the plan for the area was going to look like. I looked at the plan and asked “What about the traffic?” The answer I received “Thats [sic] not our problem, its up to the Los Angeles County Road Dept.”

Well, NOW IT IS YOUR PROBLEM AND OURS TOO! So you had better solve it before you build The Village, or anything more!!!!

Response 189-5

The suggestions stated in this comment are current operational issues that are handled by the LADOT’s Operations office or the County Department of Public Works. The comment is noted and will be forwarded to the respective jurisdictions for their review and consideration.

Comment 189-6

Mr. Shockley’s street sign proposals are provided on the following page.

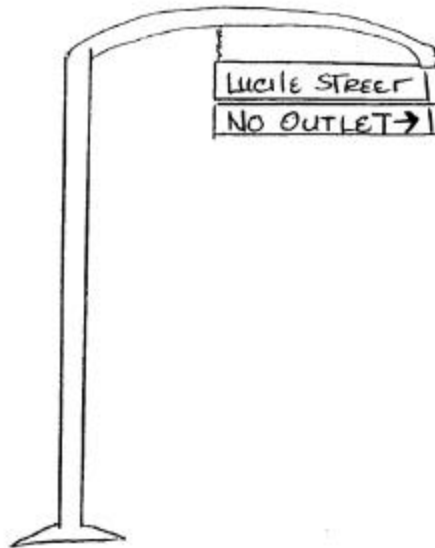
Response 189-6

This attachment was submitted in support of comments stated in Comments 189-4 and 189-5. As such comments related to this attachment are addressed in Responses 189-4 and 189-5.

To Playa Vista EIR
from Shockley, Mickey

- 4 -

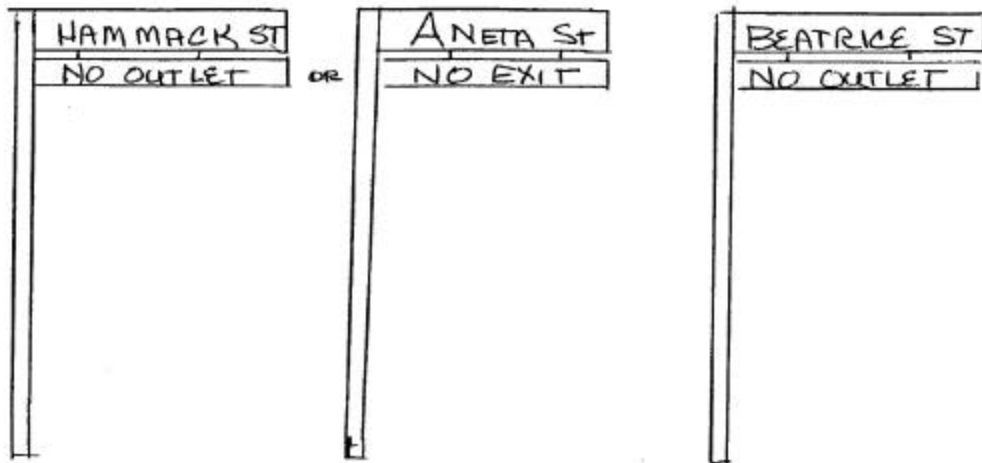
Proposal #1 ON LUCILE ST.



SIGN STATING EITHER
NO OUTLET → GOING SOUTH
OR ON CENTINELA
NO EXIT →
AND
← NO OUTLET GOING NORTH
← NO EXIT ON CENTINELA

2 SIGNS- ON EACH SIDE
OF SIGN

Proposal #2 ON HAMMACK ANETA BEATRICE & JUNIETTE.



POSTED ON EACH SIDE OF SIGN

LETTER NO. 190

James R. Smith
Post Office Box 644
Venice, CA 90294

Comment 190-1

Perhaps no location could be worse suited for the Playa Vista Phase II development than the Ballona Gap, “an ancient floodplain.” Lurking directly beneath the surface, scientists conjecture, may be the Compton-Los Alamitos Fault.

Response 190-1

As discussed in Subsection 2.2.2.2.1 of Section IV.A, Earth, of the Draft EIR on page 224, the Compton-Los Alamitos Fault may pass beneath the Proposed Project site at a depth of 3 to 6 miles below the ground surface. As discussed in Subsection 2.2.2.2.1, recent geotechnical studies (2000 and 2001) performed by Earth Consultants International and Davis and Namson Consulting Geologists concluded that there is no evidence of surface or shallow subsurface faulting at the Proposed Project site, and, therefore, the potential for surface rupture is considered extremely low (See Appendices D-4 and D-5 of the Draft EIR). Given the depth of the fault, the potential for surface fault rupture hazards to structures or people at the Proposed Project site is considered extremely low. The potential for groundshaking impacts to the Proposed Project in the event of an earthquake along this fault would be no greater than groundshaking impacts from any other local fault, since seismic waves propagate from earthquake epicenters radially to all surrounding areas.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 190-2

In addition, according to the Report, “The City of Los Angeles General Plan Safety Element indicates that the Playa Vista area is subject to potential liquefaction and the Proposed Project site is within an official Liquefaction Zone” (Page 183, Village at Playa Vista Draft EIR, August 2003).

Response 190-2

Liquefaction hazards at the Project site are addressed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 256. As indicated in the Draft EIR, there exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project

site. As part of the issuance of building permits by the City's Department of Building and Safety for individual structures, site-specific geotechnical investigations are required. Given that the City's Department of Building and Safety requires site-specific investigations (including liquefaction risk assessment) prior to construction, and the application of engineered fill soils in building pads would address the potential for liquefaction directly under structures, impacts to the Proposed Project from on-site liquefaction are considered less than significant.

Comment 190-3

The Report also acknowledges that the proposed project is in an area of poor air quality, with elevated air pollution levels, but draws no negative conclusions about adding a development that will dump additional large amounts of pollutants into our air.

Response 190-3

The Draft EIR provides a detailed discussion of unavoidable adverse impacts before and after the imposition of mitigation measures in Subsections 4.0 and 5.0 of Section IV.B., Air Quality, of the Draft EIR. Specifically, the Draft EIR concludes that after implementation of all feasible mitigation measures, Project construction, inclusive of the Equivalency Program and the proposed off-site improvements, would generate CO, NO_x, and ROC emissions that exceed SCAQMD regional significance thresholds for construction activities. Therefore, regional emissions from both on- and off-site (e.g., delivery trucks) construction sources would have a temporary but significant and unavoidable adverse impact on regional air quality. During the Project's operational phase, the Project, inclusive of the Equivalency Program, would result in emission levels that exceed SCAQMD significance thresholds for CO, NO_x, PM₁₀, and ROC. Mitigation measures would reduce the potential air quality impacts of the Project, inclusive of the Equivalency Program, to the degree technically feasible, but emissions would remain above SCAQMD significance thresholds. Therefore, Project operations, inclusive of the Equivalency Program, would have a significant and unavoidable adverse impact on regional air quality. Accordingly, a statement of overriding considerations would be required for Project approval.

Comment 190-4

The Report also glosses over the amount of water pollution that the project will produce and that will detrimentally affect the Santa Monica Bay as well as the Bellflower Aquitard, Ballona Aquifer, and the Silverado Aquifer which lie beneath the project site. The state of California has already given an "impaired" rating to the Bay, Ballona Creek Estuary, and Ballona Wetlands.

Response 190-4

A comprehensive analysis of the potential impact of the Proposed Project on waterbodies that directly or indirectly receive runoff from the Proposed Project site, such as Santa Monica Bay and the aquitard/aquifers, is found in Section IV.C.(2), Water Quality, of the Draft EIR. Section IV.I, Safety/Risk of Upset, of the Draft EIR also addresses the potential impacts of the Proposed

Project on public health and safety as it relates to existing soil and groundwater contamination at, and adjacent to, the Proposed Project site.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 190-5

TRAFFIC

The most immediate visible impact of the project, should it go forward, will be to traffic congestion. The Report acknowledges what residents of the area already know, that many of the intersections are at present near gridlock. Lincoln Blvd. is a prime example of a street that is already over capacity for much of the day. Even streets that have better ratings, such as Abbot Kinney Blvd., are choked with commuter traffic. An honest appraisal of the traffic impact of Playa Vista II will show that the project would have a devastating impact on westside streets and freeways. Such an independent study should be conducted without delay, in order to allow a realistic evaluation of this project.

Response 190-5

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A comprehensive analysis of the Proposed Project's traffic impacts is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR. Please See Topical Response TR-1, Playa Vista Transportation Model, on page 445, for a discussion of the transportation model and analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not result in any significant traffic impacts.

Comment 190-6

Playa Vista lies close to California's fragile coastline. Even without this project, the coast is besieged by irresponsible developers who neglect any thought of the impact of their developments on the precious environmental resources that are our legacy to future generations. It is important that the coast be protected from such irresponsible projects such as Playa Vista, not just for those who live nearby, but for all Californians. In the past, the coast has served as a relatively pollution-free area to which residents of the inner city could escape. Playa Vista, and similar if smaller developments, is changing that dynamic. The coast is becoming clogged with

traffic, mini-malls and cookie-cutter development projects who's [sic] sole purpose is making profits for their developers.

Response 190-6

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 190-7**SUSTAINABLE DEVELOPMENT**

It is time that the state of California and local governments approve only sustainable developments and say no to irresponsible developments that destroy our future. We should also adopt a holistic approach to development that demands that regional solutions to problems such as traffic and pollution be addressed as part of the approval-or disapproval-process, in addition to more local concerns such as zoning. This is the essence of "planning," which the EIR attempts to downplay or ignore.

If reducing traffic and pollution along the coast are not part of the discussion about Playa Vista Phase II, there cannot be a claim that there really is a planning process. Instead, we are simply allowing random development. We should say as much.

In sum, the coastal area should be a mixture of human activity and nature. Public space should be at least as important as private development. Green space, in the form of large and small parks, wetlands, undeveloped bluffs and nature preserves should be given consideration in all development decisions. Playa Vista I, with its closely packed buildings, indicates that the developers do not understand this concept, regardless of their public relations campaign.

Response 190-7

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Playa Vista Project has been the subject of a long and complex planning process. The scale of the Project has been reduced substantially, with over 70 percent of the former Master Plan now preserved as open space.

A comprehensive traffic impact evaluation study has been performed, including coordination with numerous jurisdictions, during the study process. The traffic impact analysis is provided in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. This study is included along with all the technical analysis in Appendix K of the Draft EIR. The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the

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

The Proposed Project has incorporated numerous sustainability concepts. For example, the Project provides a balance of residential, commercial, and retail uses that are all located within walking distance of at least one of a dozen parks. In addition, the freshwater marsh within the Playa Vista First Phase Project and riparian corridor was designed for natural storm water planning. The Proposed Project will incorporate the same features that were used in the Playa Vista First Phase Project that has been recognized as a model project for sustainable urban development. The overall Playa Vista project has also been recognized as one of five P.A.T.H. (Partnership for Advancing Technology in Housing, established by former President Clinton) communities in the United States and has also received the Ahwahnee Award from the California Local Government Commission's Center for Livable Communities.

Comment 190-8

HOUSING

At the same time, the coast should not be a playground just for the wealthy. Affordable housing and strong rent control should be a part of any environmental analysis. The level and percentage of affordability requirements at Playa Vista and other coastal developments should be in proportion to income levels in the metropolitan area. Anything less will continue the trend toward the coast becoming an enclave for the well-to-do. In this regard, Playa Vista Phase II is part of this problem. Real affordable housing, as well as cooperative housing ownership, should be considerations that are incorporated into Playa Vista Phase II and other development projects.

Response 190-8

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. As a point of reference, the Project site is located approximately 2 miles inland from the coast, outside of the Coastal Development Permit area.

Comment 190-9

The first step to sustainable development along our coast should be a moratorium on all new construction that worsens the current traffic and pollution problems. Rail transit along major coastal corridors, such as Lincoln and Sepulveda Blvds., and to and from the coast from inland areas are the kinds of development projects we should be considering. When mass transit is in place that is capable of handling the majority of trips, increased density will be possible,

particularly along these transit corridors. Meanwhile, a moratorium would ensure that mass transit rail lines are built sooner, rather than later. In addition, bike and pedestrian-only zones in some of our coastal cities, including Venice, are the kind of “zoning” possibilities we should be considering.

Response 190-9

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 190-10**THE SOCIAL COSTS OF PLAYA VISTA II**

The only aspect of the Playa Vista project that is private is the massive profit that will be reaped by the developers. Meanwhile, the social costs of the project will be left to the taxpayers, beginning with millions of dollars in roadway “improvements” required to accommodate Playa Vista traffic.

Other social costs include public health expenses due to increased incidents of emphysema, other heart and lung diseases and cancer engendered by increased pollution, as well as mental health problems worsened by road rage and frustration with overcrowded streets. Pedestrian and bicyclist casualties are sure to increase because of increased auto usage. And in the long run, the public will be saddled with massive repair of ecological damage caused by constructing this project in the delicate Ballona Gap.

While the developers of Playa Vista may claim that their property rights allow them to go forward with this project, they are wrong. In crowded urban areas, individual property rights must be used in socially productive ways, and with the agreement of the community. To advocate unrestricted, or barely restricted, property rights is like advocating the free speech right to yell “fire” in a crowded theater. We all live in crowded [sic] theaters, called the Los Angeles basin and the California coast. The Playa Vista Phase II project will cause irreparable harm to our crowded theaters, and must be denied if we are to have a sustainable legacy to hand down to our children and grandchildren.

Response 190-10

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 191

Mary Smith
mary.smith.lfny@statefarm.com

Comment 191-1

I am writing to voice my concern regarding Phase II of the Playa Vista development. I have lived in Los Angeles for 32 years and have worked hard to purchase a home [i]n a safe neighborhood within driving distance to my work. As the city of Los Angeles seems to be growing at a phenomenal rate I have noticed that a drive to Brentwood which use [sic] to take me 10 minutes now takes 30 minutes from Westchester. I have noticed that since the opening of Phase I in Playa Vista has been opened and people [h]ave begun to move in that traffic from Jefferson Blvd on has become chaotic. I can only imagine when there are several thousand more people all converging on the 405 freeway in another year or so that my commute will easily take an hour.

I'm not sure what the city was thinking when they approved the development but it was grossly incompetent to approve the building of Playa Vista. Anyone that knows the area, knows that all of the south bay converges onto either the 405 or Lincoln not to mention every city south Culver City. If you have ever tried to drive down Lincoln anytime after 3:00 in the afternoon from Santa Monica, you would know that it will take you over an hour to get to the Marina. These are the only two options for people that live in either Westchester or the South Bay. I feel sorry for those that have no other option but to sit in gridlock on the 405.

I don't know how much more clear I can be but between LAX and this new development you guys have succeeded to create complete gridlock on the only freeway available going North & South. There is not enough money that the city could have gotten to approve this plan that would justify disturbing and destroying peoples lives.

There are people like several of my neighbors that work full time and have children. There [sic] children are in day care and have to be picked up by a certain time in order to be able to continue to take their children to a facility they feel confident in. Many of them have told me that the traffic has become so much worse that they are not able to make it in time and are charged by their daycare for being late. You may say well just leave a little earlier and you will be fine. I do not know many employers in corporate America that will just let their employee leave an extra 20 minutes early because traffic is bad.

I am pleading with you that you please STOP Phase II before it can not be corrected. We do not need an entire city within an already congested city. There has to be an alternative. There are endless cons to this development and only a handful of pros. The most serious cons would be health conditions, traffic congestion, & Noise. I do not know of one pro that would out way the con.

PLEASE STOP PHASE II !!!!! The people of this city should have a voice and have spoken. They do not want this to go through!!!!

Response 191-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798. The analysis includes the identification of mitigation measures to reduce potential Project impacts. The mitigation measures would help to mitigate some impacts from regional growth as well as impacts from the Proposed Project. The Draft EIR also provides detailed analyses of air pollution impacts in Section IV.B, Air Quality on page 270, and noise impact in Section IV.E, Noise on page 553.

LETTER NO. 192

Richard Stall, Jr.
10507 West Pico Boulevard, #200
Los Angeles, CA 90064

Comment 192-1

Transit improvements in the first phase of Playa Vista are already reaping positive dividends for the local community. Jefferson Boulevard is greatly improved, and the Culver Loop and Widening project has made driving in the area far safer and more convenient. Improvements on Lincoln Boulevard between LMU and Jefferson are set to start soon, making that thoroughfare safer and less congested.

The Village will continue the improvements Playa Vista is making to the region's transportation system. Public transit will be greatly improved through extended service to employment centers in West Los Angeles.

I think the most important improvement in The Village plan is the completion of Bluff Creek. This new street will be a new arterial that will take traffic generated within Playa Vista and connect it to the 405 to the east and Lincoln to the west. There is no doubt that this improvement will also be enjoyed by commuters from as far south as the South Bay and as far north as Venice. Bluff Creek will run parallel to Jefferson, and will add capacity to accommodate growth.

I also believe that the improvement to the loop ramp at Lincoln and Culver will make it easier to transition to the Marina Freeway.

All of these improvements are made possible by Playa Vista, and make up for decades of deferred maintenance on our local streets and roadways. These improvements are meaningful, part of a regional solution and were conceived based on detailed analyses.

Response 192-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 193

Richard Standke
22108 Gresham Street
West Hills, CA 91304

Comment 193-1

The Village is an innovative development plan, especially as it relates to water quality issues. The Village will include rooftop drains that will filter the water and clean it before entering storm drains. Also, most of the parking in The Village is underground, enabling runoff from cars to be captured and cleaned unlike what we experience in surface parking lots all over the city.

On top of those improvements, Playa Vista is planning to finish the riparian corridor. This important corridor is part of a natural stormwater management program that filters water before it enters the wetlands and the Santa Monica Bay. The system is incomplete without The Village portion.

The Village has model programs for water quality. The rest of the city should read this section of the draft EIR and apply the programs that Playa Vista is implementing throughout the city.

Response 193-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 194

Shelly Stelzer
11912 Weir Street
Culver City, CA 90230

Comment 194-1

I'm writing in regards to the traffic problems existing on Inglewood Blvd. between Braddock Dr. and Jefferson. In my opinion and those of my neighbors, there is a very dangerous situation existing due to the fact that there is an absence of stop signs on that stretch of roadway. The cars speed down Inglewood non stop and behave as if it's a freeway!! We would like to have stop signs installed as you did on Mesmer, to help slow down the cars, as well as create intermittent breaks in the traffic flow. The proposed stop light at Inglewood and Allin will not alleviate the current or future "speedway" conditions.

Your attention to this matter is greatly appreciated. I can be reached at the above address or at (310) 391-4175 if you have any questions.

Response 194-1

The comment points out traffic safety and operational issues associated with existing traffic conditions on Inglewood Blvd. between Braddock Drive and Jefferson Blvd. The issues are not related to the Proposed Project or Project impacts. The requested improvements are not needed to address the impacts of Project traffic. These comments and suggestions will be forwarded to the Los Angeles Department of Transportation for review.

LETTER NO. 195

Richard and Pat Sterner
118 Fowling Street
Playa del Rey, CA 90293

Comment 195-1

We are residents of Playa Del Rey, a family with two small children. We have watched the Playa Vista project closely over the past few years. We are glad to see the attempt to make the project has [sic] minimal impacts on the surrounding environment and communities.

We hope to see this continuing attempt so that our community can maintain a high quality of life.

At this time, we would like to suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site into a park. We think that the park will be something that everyone in the neighborhood can enjoy. It will keep the area maintain the residential environment. Also, families with children would have more places to spend quality time together.

We would like to thank you for your consideration of this matter.

Response 195-1

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

LETTER NO. 196

Russell Stone
7713 Emerson Ave
Westchester, CA 90045

Comment 196-1

The Fresh Water Marsh has been a great success in providing habitat for birds. Phase II can be another boon to birds if done right. Based on my extensive birding along the bluff, I have found that the Playa Vista area has tremendous potential for attracting migrating songbirds. All that is needed is good habitat. If the riparian area, the bluff side, and the bluff canyons are landscaped properly, they can attract large numbers of birds.

Response 196-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 196-2

With the arrival of West Nile virus in southern California, I am concerned about its effect here. Construction site drainage ditches are prime breeding grounds for the kind of mosquitos [sic] that can carry the virus. The developers will need to find a way to prevent West Nile virus without poisoning the birds in the Fresh Water Marsh.

Response 196-2

The Ballona Freshwater Wetland System Operating, Maintenance and Monitoring Manual (contained in Appendix F-2 of the Draft EIR) requires monitoring for presence of mosquitos in the Freshwater Marsh and the Riparian Corridor. Recent monitoring of the Freshwater Marsh demonstrates that mosquito fish are effective at controlling any mosquito-related problems.

Comment 196-3

Playa Vista will bring a tremendous traffic increase to our streets. Because of the bluffs and the airport, north-south traffic through Westchester is confined to Sepulveda Blvd, Lincoln Blvd, and the 405 Freeway. These streets are already clogged. Cars traveling north on Sepulveda turning left on Centinela in morning rush hour already have to wait five minutes to make the turn. I'm afraid it will be ten minutes after Playa Vista is complete.

Response 196-3

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

Comment 196-4

Unlike the above, there is another bottleneck area that has a simple solution. Overland Avenue, between Playa St and Culver Blvd is a major thoroughfare, yet it has two intersections with 4-way stops. In Friday night rush hour, traffic is backed up from Sawtelle to Culver. The obvious solution is for traffic signals to be installed here.

Response 196-4

The comment points out traffic operational issues associated with existing traffic conditions on Overland Avenue between Playa Street and Culver Boulevard, within the City of Culver City. The issues are not related to the Proposed Project or Project impacts. The requested improvements are not needed to address the impacts of Project traffic. These comments and suggestions will be forwarded to the City of Culver City for review.

LETTER NO. 197

Isabel Storey
Isastor@aol.com

Comment 197-1

I would like to express my strong opposition to the Playa Vista Project, phase 2. I have been opposed to this development from the beginning, as it removes one of the last remaining wetlands on the West Coast and one of the last open spaces in the area near where my family lives.

As an approximately 20-year resident of Sunset Park, I urge you to come out strongly against further development of this site. The increased traffic will affect us directly, every day. And I believe the additional development is detrimental to our quality of life. What use is more development, no matter how well done, when it removes one of the last natural places left anywhere near us?

Both my children have taken school field trips to the wetlands and learned a great deal about the natural world. They have enjoyed seeing the many kinds of birds that use this as a stopping point on their migrations. There are so few wetlands left. Where will these birds stop if more of the wetlands are removed? I have seen studies that say that if the wetland area becomes too small at this site, it will not be large enough for the birds to stop. This affects not just the wildlife itself--but also the people, adults and children--whose quality of life is enhanced by their presence.

Keep in mind that once these lands are lost, they are most likely lost forever.

Response 197-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Section III.A, Overview of Environmental Setting, of the Draft EIR, beginning on page 182, the Proposed Project site is not vacant, unused open space. In contrast, the Project site is currently used for a number of permitted activities associated with the construction of the adjacent Playa Vista First Phase Project, and since the 1940's has been part of an industrial complex which housed the Hughes Aircraft operations. Because of historic and existing disturbances, only small stands of native plants remain on-site, and even these have a high proportion of non-native species. Due to the presence of a high percentage of non-native species and long history of disturbance, habitat within the site is highly fragmented and of marginal quality. No threatened or endangered species occur within the site. Tours of wetland areas west of Lincoln Boulevard, approximately 1.1 miles west of the Proposed Project site, would not be

affected by the Proposed Project. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, and a detailed analysis of biological resources in Section IV.D, Biotic Resources on page 523. See also Sections II.15 and II.7, respectively, of the Final EIR, for corrections and additions to these sections.

LETTER NO. 198

Glenn Stronks
7815 Yorktown Place
Los Angeles, CA 90045

Comment 198-1

Now that Playa Vista is well along with its first phase, it's dear to me that you need The Village to complete the Playa Vista community. As a local resident, I think it is important to provide the residents of Playa Vista a place to shop for groceries and get their dry cleaning taken care of.

It will also help traffic in the area if Playa Vista residents can do that type of shopping within the community without having to drive to Westchester, Playa del Rey or the marina.

The Village is a common-sense proposal that completes the idea of what Playa Vista is all about. It deserves to move ahead.

Response 198-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 199

Nancy Swaim
1846 Walgrove Avenue
Los Angeles, CA 90066

Comment 199-1

I am a longtime Mar Vista resident, homeowner and community activist.

My group, WAAG (Walgrove Avenue Action Group) works for the betterment of our community. Our mission is to work for the control of speed, reduction of overweight/oversize vehicles and reinstatement of Walgrove as a safe street on which to live and travel.

We are practical in our approach. While we do not deny that the tremendous influx of vehicles on our street has increased exponentially with Westside development, the main problem, and the main cause of accidents, is speed and overweight/oversize vehicles.

A few years ago, my group approached Playa Vista for help and we got it. Through their efforts, we have gained direct approach access to City agencies. Playa Vista offered and completed a costly speed study of Walgrove Avenue, the results of which contributed to DOT creating a punchlist for improvements, some of which the City has implemented, the others which have every possibility of being realized.

The Playa Vista Phase II DEIR is currently on the boards and has received much criticism from individuals and groups, some of which are overseen by outside interests.

I make my home and have my business in Mar Vista and Marina del Rey. I am a member of a neighborhood group that has received recognition and support from Playa Vista, whereas, it is rare for a developer to offer to mitigate their environmental impact. I believe the P.V. DEIR is basically sound in its approach. There remain questions of detailed plans to be answered, such as exactly what traffic mitigation Playa Vista will implement, and where. WAAG will reserve judgment on the overall plan until such time as that information is provided.

A version of Phase II must be realized as an integral part of the overall concept of a planned community.

I encourage the City to look beyond the biases of those who are opposed to the project because they refuse to acknowledge the reality of life on the Westside. The crucial housing shortage will inevitably result in development, period.

Managing that growth requires working closely with developers and interfacing the developers with the community, something the City should have done more of long ago.

Playa Vista has made good on the initiative to do that on its own.

By doing so, they have earned a place in the community.

Response 199-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts, including analysis of traffic on Walgrove Avenue, has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100-square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

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

LETTER NO. 200

Greg Sweel
1920 Sixth Street, #343
Santa Monica, CA 90405

Comment 200-1

I am writting [sic] to comment on the Phase II EIR for Playa Vista.

I am opposed to increased traffic this development will create. Increased traffic must be mitigated or the project should not be allowed to continue.

Response 200-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

Comment 200-2

I am opposed to increased air pollution this development will create. Increased air pollution must be mitigated or the project should not be allowed to continue.

Response 200-2

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Subsection 5.0 of Section IV.B., Air Quality of the Draft EIR, all feasible air quality mitigation measures have been identified. This Draft EIR section concludes that even after the implementation of all feasible mitigation measures, both construction and operational regional emissions would exceed SCAQMD regional significance thresholds, resulting in a significant unavoidable impact which would require a finding of overriding consideration by the Lead Agency. However, please note that an in depth analysis of potential localized construction and operational impacts related to the Project was provided in Subsection 3.4.1.2 and Subsection 3.4.2.3 of Section IV.B. Air Quality of the Draft EIR. As concluded in these subsections of the Draft EIR, no localized significant impacts (e.g., exceedance of any health based standards) would occur as a result of the Proposed Project.

Comment 200-3

The EIR must address the indoor air inhalation exposure route due to chlorinated solvents in groundwater and soil beneath this project. The Johnson-Ettinger Model must be used to evaluate this risk and must use California specific input parameters required by the Department of Toxic Substances Control.

Response 200-3

As addressed in Subsection 2.1.2.3 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, starting on page 666, existing contamination in the Proposed Project site that represents a risk to human health will be addressed through the use of health-based remediation goals (HBRGs). HBRGs for the First Phase Project were calculated taking into account vapor intrusion (indoor air inhalation) of chlorinated solvents and other volatile chemicals by using models developed by USEPA (2003) and modified to include California-specific input parameters. The Johnson-Ettinger model, with California specific input parameters, was one of the protocols followed to evaluate the risk of volatile chemicals in indoor air and to develop HBRGs for the First Phase Project. In accordance with Cleanup and Abatement Order No. 98-125, HBRGs will be developed for the Proposed Project site and will, at a minimum, be the same as the HBRGs for the First Phase Project site. The Johnson-Ettinger model, with California-specific input parameters, will also be followed to evaluate the risk of volatile chemicals in indoor air in the development of HBRGs for the Proposed Project site.

Comment 200-4

The EIR must address the explosive hazards presented by underground methane and the health risks posed by hydrogen sulfide in the subsurface.

Response 200-4

The Draft EIR provides a detailed discussion of soil gas issues in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR, starting on page 700. Also see Topical Response TR-12, Soil Gas, on page 477.

Comment 200-5

The EIR must address the ecological impacts on the newly acquired State property wetlands. An ecological risk assessemment [sic] must be performed to evaluate these potential risks.

Response 200-5

None of the land sold to the State of California was part of the Proposed Project or the First Phase Project. Moreover, the Draft EIR discloses the potential sale of Area A and portions of Area B to the State. The Draft EIR in Section I.D., Project Background, on page 7, acknowledges the agreement between the Applicant and the Trust for Public Land (TPL) for the State of California to acquire all of Area A and portions of Area B for long-term open space/recreation uses as well as the exclusion of Area C from the Playa Vista Planning Area. Consistent with the TPL Agreement, the State acquired this property in December 2003. At this time, the State has not determined the actual use of or proposed a specific project for these areas. The sale of Area A and a portion of Area B to the State does not alter the previously approved First Phase Project; therefore, the impacts of the First Phase Project as evaluated in the 1993 EIR and 1995 Mitigated Negative Declaration/Addendum remain unchanged. Further, the sale does not alter any component of the Proposed Project; therefore, the impacts discussed in this Draft EIR for the Proposed Project remain unchanged. The DEIR analyzes impacts of the Proposed Project, if any, on these areas as they currently exist. These areas are geographically separated from the Proposed Project by the First Phase Project as well as other urban development. As discussed in Subsection 3.3.3 of Section IV.D, Biotic Resources, of the Draft EIR on pages 543-545, the Proposed Project is expected to have a less than significant impact on downstream wetland habitats in Area B.

CEQA does not require preparation of either a Supplemental or a Subsequent EIR unless changes in a Proposed Project or the affected environment might alter impacts discussed in the Final EIR certified for the Proposed Project. In this case, a Final EIR has not been certified for the Proposed Project, and no changes in the Proposed Project or the affected environment have occurred. Accordingly, neither a supplemental EIR for the Proposed Project nor a subsequent EIR for the First Phase Project are required.

LETTER NO. 201

Marcy Szarama
Project Manager
PinnacleOne Los Angeles

Comment 201-1

I got an email from “Stop Playa Vista” now. They keep emailing me. I just want to let you know, I don’t agree with them. I support the project.

Response 201-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 202

Wei Shoong Teh
5359 South Centinela Avenue
Mar Vista, CA 90066

Comment 202-1

This concern stems from the recent change to a 6 lane roadway along South Centinela Avenue section from Jefferson to the 90 freeway for the Playa Vista Village Development.

Since conversion to 6 lane roadway, as a resident of this section, the noise level has increase [sic] significantly due to (1) vehicles such as noisy busses using the newly created rightmost lane closest to the residential houses and (2) increase [sic] traffic as more drivers discover the increase [sic] lanes.

Just as significantly, residents have lost the ability to park our cars in front of our houses during peak hours as new signs were erected recently after the conversion to 3 lanes either way.

This letter is a request to find out what Playa Vista and the City is considering to minimize the above issues and regain support for the proposed Village such as

(1) Installing and maintaining sound absorbing shrubs beside the curb. (Less effective sound control but aesthetically pleasing)

(2) Installing and maintaining sound walls. (More effective sound control, can be made aesthetically pleasing)

(3) Helping residents locate alternate parking areas or suggest alternate parking solutions.

(4) Re-drafting the fence and height limits for taller resident fences and walls facing Centinela Ave.

I look forward to a favorable reply and any additional steps residents will need to take, any meetings we need to attend to address the above issues.

Response 202-1

The comment raises traffic, parking and noise issues associated with existing traffic conditions on Centinela Avenue between the Marina Freeway (SR-90) and Jefferson Boulevard, and suggests these issues result from implementation of a mitigation measure associated with the previously approved First Phase Project.

The impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, and implementation of the mitigation measures required within the EIRs discussed above, as well as all other known projects expected to be completed in the study area.

A condition of approval was included for the previously approved Playa Vista First Phase Project, which requires funding of a Parking Replacement Trust Fund to address the loss of parking spaces resulting from First Phase Project traffic mitigations along Centinela Avenue, Inglewood Avenue, and Jefferson Boulevard, and is not part of the Proposed Project. As noted in subsection 4.0, Section IV.K.(2), Parking, on page 951 of the Draft EIR, the Proposed Project would not have significant impacts on parking.

As shown in Table 77, in subsection 3.4.2.1.2, Section IV.E, Noise, on page 577 of the Draft EIR, the Proposed Project would not result in any significant traffic impacts related to increased roadway traffic noise along Centinela Avenue or any other roadway. In addition, implementation of the Project's off-site improvements would also result in less than significant noise impacts along Centinela Avenue (See Subsection 3.4.4 of Section IV.E, of Volume 1 of the Draft EIR). No mitigation is required.

LETTER NO. 203

Arnold Tena
7728 Hindry Avenue
Los Angeles, CA 90045

Comment 203-1

I have been a resident of Westchester for over thirty-five (35) years and I have not seen more of a desecration of our area than I have in the past five years. I can understand that more and more people are moving into this area and that these people need a place to live. I don't believe this project meets the needs of the people that want to come into our area, as the building that I see going up is strictly for up-scale clientele. Where is the affordable housing that is so much needed?

Response 203-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

As discussed in Section IV.J, Population, Housing and Employment, of the Draft EIR, the Proposed Project is anticipated to provide a range of housing types and sizes at corresponding cost levels. The Proposed Project does not result in the removal of any affordable housing units, or the relocation of any households residing in affordable housing units. As such, development of the Proposed Project would have a less than significant impact on affordable housing.

Comment 203-2

I am also very concerned about the added congestion all of this building will bring in to the area. Lincoln Boulevard is already over used,

Response 203-2

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

Comment 203-3

contrary to the studies that I have seen the developers put forth. I am also concerned about the impact all this is having on the ecological make-up of [sic] the area. The time will come when we will look down from LMU and see nothing but roofs of housing units with no open space.

Response 203-3

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 203-4

Lastly, I have read, this day, as a matter of fact, that there is a really serious drought in the high Sierras and that there is much concern throughout the west, that water will be in short supply. This expected to affect all of us here. Where is all the water coming to satisfy all the people purportedly coming into the Play [sic] Vista area? Have all of these matters really been given thorough thought by the developers and the city powers that be? I think not.

Response 203-4

LADWP is the "public water system" for the Proposed Project, as defined in Water Code section 10912(c). As required by SB 610 (now codified in the Water Code), LADWP prepared and certified a Water Supply Assessment (WSA) for the Proposed Project. According to the WSA, the Proposed Project is estimated to use 746 acre-feet of water annually. The WSA further states that the projected increase falls within the available and projected water supplies for normal, single-dry, and multiple-dry years through the year 2020 and within the 20-year water demand growth projected in LADWP's 2000 UWMP. As required, the WSA is included in the Draft EIR (Appendix N-1b).

LETTER NO. 204

Boise E. Thomas
119 Fowling Street
Playa del Rey, CA 90293

Comment 204-1

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

We are optimistic this new, smaller version will have fewer impacts on the surrounding communities so we all can maintain our quality of life. I am very glad to see that the housing plans incorporate parks and open space sites.

I would like to take this opportunity to request Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

Response 204-1

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

LETTER NO. 205

Mona and Kenneth Tilden
5625 Crescent Park West
Playa Vista, CA 90094

Comment 205-1

Please don't take away our chance to have new stores and restaurants and, best of all, a local market at Playa Vista.

The Village will provide all of these things to our neighborhood, and we desperately want these things so that we can walk to the market or grab a cup of coffee without getting into our cars.

I think of the wonderful city neighborhoods in other parts of the country where people walk to work, walk to get their morning newspaper and pass each other on the sidewalks instead of on the freeway. Playa Vista has the chance to be one of those neighborhoods. Please support The Village and make our neighborhood the best it can be.

Response 205-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 206

Jack Topal
8200 Calabar Avenue
Playa del Rey, CA 90293

Comment 206-1

Water quality in Santa Monica Bay is very important to me. After major storms, we hear reports that the sewers are spewing contaminated water into the Bay, and reporters often warn viewers not to swim in the water in fear that they might contract waterborne illnesses.

I personally go sailing in the Santa Monica Bay every Friday and I have seen sheets of sewage and debris floating on the water, which is very disturbing. I am sure that this has an adverse effect on the fish and seals.

I understand that storm water from the property that is now owned by Playa Capital has gone untreated for years and flows directly into the wetlands and Ballona Creek. I am also a member of Friends of Ballona wetlands and am concerned about protecting these valuable wetlands. I also understand that Playa Capital constructed a freshwater marsh that is part of a natural storm water management system that helps to remove contaminants before they enter the Bay.

With The Village, this natural storm water management system will be completed with the development of the riparian corridor. After decades of mismanagement of water runoff, we finally see the light at the end of the tunnel. Playa Vista is not just building a responsible storm water management project. It is a model for others to follow.

Playa Vista should be commended for this precedent setting program, and the City should find it necessary to grant the approvals that will enable this system to be completed.

Response 206-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 207

Lawrence and Margaret Toy
3701 Inglewood Boulevard
Los Angeles, CA 90066-3211

Comment 207-1

Please be aware that the traffic on the intersection of Inglewood Blvd and Venice Blvd. is backed up in front of my house for at least two signal cycles at peak AM and PM traffic time. I live north of Venice Blvd. on Inglewood Blvd. and can't get out of my driveway at PM peak traffic time. With the new Fire Station on the south east corner, this would create a lot of problems for them. The idling motors in front of my house is not helping the air quality.

Response 207-1

The comment points out traffic operational issues associated with existing traffic conditions at the intersection of Inglewood Boulevard and Venice Boulevard. The comment also raises traffic operational issues with the placement of a new Fire Station on the southeast corner of that intersection. These issues are not related to the Proposed Project or Project impacts. These comments are noted and will be incorporated into the Final EIR for review and consideration of decision makers.

Air Quality impacts attributable to idling vehicles are addressed in the Draft EIR via analyses of carbon monoxide (CO) levels. An in depth analysis at selected intersections to determine the potential for the presence or the creation of CO hot spots attributable to the Proposed Project was provided in Subsection 3.4.2.3 of Section IV.B, Air Quality, of the Draft EIR. Intersection with the greatest potential for impacts were selected based on their Level of Service (LOS), the Project's traffic contribution to the intersection, the proximity of Project traffic to sensitive receptors, and intersection traffic volumes. This analysis evaluated conditions at intersections along Inglewood Boulevard as well as a number of other locations in the areas surrounding the Project site. As shown in Tables 17 through 20 of Section IV.B, Air Quality, of the Draft EIR, no significant impacts would occur at the intersection with the highest traffic volumes and worst level of service. Since significant impacts would not occur at the intersections with the highest traffic volumes that are located adjacent to sensitive receptors, no significant impacts are anticipated to occur at any other locations in the study area (e.g., Inglewood Boulevard and Venice Boulevard) as the conditions yielding CO hotspots would not be worse than those occurring at the analyzed intersections. Consequently, the sensitive receptors that are included in this analysis would not be significantly affected by CO emissions generated by the net increase in traffic which would occur under the Proposed Project. As the proposed Project does not cause or localize air quality impacts related to mobile sources, emissions would therefore be less than significant for the Proposed Project.

LETTER NO. 208

Joseph Treves
jntreves@earthlink.net

Comment 208-1

As a realtor living and working in the Mar Vista community I have gotten to know many of the residents in my neighborhood. We are all very concerned by the over crowding and traffic the Playa Vista project is causing to our community and we are distressed as to how this will impact our community and our property values. This development isn't even complete and traffic is already distressingly thick and difficult to navigate.

Response 208-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798.

Comment 208-2

Traffic mitigations are dubious at best and non-existent for many of the “spill over” residential streets. Even now, before we feel the full effects of Phase 1, people are avoiding existing gridlock by driving through residential areas. This will get much worse, if we support additional construction in our Ballona Wetlands.

Response 208-2

With mitigation, the Proposed Project would not result in any significant traffic impacts. A new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. In order to protect neighborhood streets, an analysis was done to address neighborhood and cut-through traffic. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458.

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510),

certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.

It should be noted that the Proposed Project does not propose any construction in the Ballona Wetlands.

Comment 208-3

58% of the places where Phase 2 traffic will cause a significant impact, Playa Vista has said it can remove the impact by increasing bus seats. Considering the socio-economic level of people paying \$800,000 and above for these homes, we don't think so!

Response 208-3

The proposed transit enhancement mitigation measures are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of other transit riders in the area. The transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the proposed mitigation would be effective to reduce potentially significant impacts to less than significant levels with as little as 1 percent to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. This level of usage is consistent with Los Angeles Congestion Management Plan projections. Please refer to Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, for a more detailed discussion.

Comment 208-4

For 38% of the significant impacts, Playa Vista is only required to (contribute to the design and implementation of...). There is no time certain requirement for this mitigation. It could be years from now or never.

Response 208-4

At locations where the mitigation program calls for the Proposed Project to contribute to the design and implementation of the measure, the contribution is expected to ensure that these improvements will be implemented. All of the proposed signal system improvements are currently scheduled to be implemented.

Comment 208-5

Playa Vista and Councilwoman Ruth Galanter promised Phase 1 would be finished before any request for approval of Phase 2. What's the rush?

Let's not proceed without first finishing phase one as promised, continue the necessary environmental impact studies to find how best to mitigate the traffic consequences of this development, and not unduly damage our precious Westside community.

Response 208-5

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers. There is no requirement that consideration of the Proposed Project be delayed until completion of the Playa Vista First Phase Project.

LETTER NO. 209

Roberta Trousdale
321 Fowling Street
Playa Del Rey, CA 90293

Comment 209-1

I am opposed to the approval of Phase 2 for Playa Vista. At the time Phase 2 was to be approved, the vacant land at Pacific and Vista Del Mar was supposed to be developed, for the benefit of the neighbors. I have not seen any plans for this, and it continues to be an eyesore in our neighborhood.

The amount of dirt and debris left by Playa Vista has made our neighborhood a construction site for many years, and they have not improved the area as they indicated they would. The traffic impact is just starting to be felt and will continue to erode our quality of life as the residents move in and traffic comes to a standstill with the present development.

Along with the Catellus development, this has made our lives intolerable with our neighborhoods being destroyed and the heavy equipment dislodging Indian burial grounds.

Please do not allow the Phase 2 to go forward.

Response 209-1

It is not clear what vacant land is being referred to. The site appears to be outside of the area of the Proposed Project. The Draft EIR provides a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798, and a detailed analysis of archaeological resources in Section IV.P.(2), Archaeological Resources on page 1199. See also Sections II.15 and II.29, respectively, of the Final EIR for corrections and additions to these sections. The “Catellus development” is not part of the Proposed Project, rather, it is a separate project, which is considered in the Draft EIR as a related project (Related Project No. 24), and considered in the evaluation of cumulative impacts.

LETTER NO. 210

John & Shirley Tweten
11947 Juniette Street
Culver City, CA 90230

Comment 210-1

1. We are totally shocked, disappointed, frustrated & concerned; with the notification that Alla Road is not planned to proceed North over Ballona Creek! It is very obvious to us; this will result in serious traffic bottlenecks & potentially contribute negatively to public safety!
2. We are also shocked, disappointed, frustrated & concerned with the notification that the planned traffic improvement at the Lincoln Boulevard/Culver Boulevard location will not proceed as we were told and expected. But, instead, will result in very serious traffic bottlenecks & potentially contribute negatively to the public safety!

The alternatives remaining for the Playa Vista traffic engineers are extremely limited as a result of these rulings by the California Coastal Commission.

Response 210-1

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR. The extension of Alla Road north over Ballona Creek is not required for implementation of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR.

The comment regarding the planned traffic improvement at the Lincoln Boulevard/Culver Boulevard intersection appears to Refer to a CalTrans improvement known as "Lincoln North," which was denied by the California Coastal Commission in January 2003. As with the Alla Road extension discussed above, the Lincoln North improvement is not required for implementation of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR.

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

Comment 210-2

The extremely NARROW twin Bridges existing at [Lincoln Boulevard/Culver Boulevard] will not provide sufficient room for our expected BIKE PATH WE HAVE BEEN promised, and looking forward to. [sic]

Instead six (6) lanes of motorized vehicle traffic will result! And our sorely needed bike path NORTH, APPRENTLY [sic] VANISHES?

PLEASE EXPLAIN THE LOGIC OF ELIMINATING THE EXPECTED BIKE PATH FROM PLAYA VISTA.

Numerous Playa Vista UPDATES have touted noticeably EXTENSIVE BIKE PATHS within. But, how do bicyclists exit the Playa Vista area, without resorting to hauling their bike by AUTO?

The final approval failure for these essential elements of traffic improvements & public safety, by the California Coastal Commission is unconscionable!

Response 210-2

This comment refers to bikeways that are located beyond the boundaries of the Proposed Project. The additional bikeways are not required for implementing of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR. The comment regarding the decisions of the California Coastal Commission is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 210-3

3. At the Inglewood Boulevard/Jefferson Boulevard intersection, Southbound traffic on Inglewood Boulevard is limited to two (2) lanes. A Right Hand turning pocket is sorely needed for westbound motorists, due to the extended wait for traffic light changes.

Response 210-3

The comment requests that a westbound right turn pocket be added to the intersection of Jefferson Boulevard/Inglewood Boulevard to accommodate existing traffic levels. The Project impacts at this location are mitigated through the implementation of the transit system improvements. Therefore, the requested right turn pocket is not required to mitigate Project impacts. The request will be forwarded to the Los Angeles Department of Transportation for review.

LETTER NO. 211

John Jay Ulloth
Director-at-Large
Southern California Transit Advocates
3010 Wilshire Boulevard, #362
Los Angeles, CA 90010
818-380-1252

Comment 211-1

I am writing in opposition to allowing the “developers” of La Ballona build any more phases of Playa Vista. Even if building is not stopped, certain minimum standards-some in the law, some common sense, must be met first before allowing any of Phase 2 or anything else to be built. Of all the places in L.A. county to take natural land and permanently convert it for exclusive human use, you could scarcely pick a worse place to allow development:

Response 211-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 211-2

1.) Building should not take place in any wetland or wetland-adjacent land presently containing surviving natural values. Studied together, with a baseline extending back 100 years, the losses of wetlands, adjacent uplands (once totaling 3,000 acres) & vernal pools due to development of Venice-of-America. Marina del Rey [sic], Playa del Rey, the 90 freeway have not been mitigated. Even though 600 acres may now be in state hands, Ballona’s usefulness as natural, open, floodplain, and wildlife refuge have been greatly reduced. The needs of fish, wildlife, and migrating wildlife that need large contiguous areas with wide buffers has not-and can not-be met by thin strips of land or any further development at Playa Vista! The placement of Playa Vista’s 1st phase that has been allowed was deliberately placed to maximize the damage to these natural values (right in the middle-to divide & conquer), and have not been replaced anywhere-particularly in the toxic runoff sump on the southwest side of Lincoln and Jefferson, formerly willow grove habitat. Pursuing the highest and best use at La Ballona means no more development there.

Response 211-2

Subsection 3.5 of Section IV.D, Biotic Resources, of the Draft EIR, on page 548, concludes that “no on-site wetlands beyond those previously permitted for fill would be impacted by the

Project.” The remaining wetlands in the Project Site, which have been permitted to be filled pursuant to previously approved Federal, State, and local permits, are less than 0.7 acre.

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

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

Comment 211-3

2.) Your past preference shown to the “rights” of developers to make money and steal subsidies from taxpayers has been granted at the expense of unacceptable life-safety risks (like brain damage in children) posed on residents: Massive quantities of toxic natural gas the Gas company stores under the site, joined by deep and unpredictable belchings of migrating gasses that have not been extracted (such as H_2S) make any residential or commercial use of these lands unconscionable. Underground gas storage facilities in California near development have been closed because of health risks, but in Playa Vista’s case, the facility is on top of them! Faults in multiple directions with 100-foot displacements cross under Playa Vista, former wetlands over a fan of alluvial soil make Ballona a prime candidate for liquefaction. The large number of capped gas and oil well heads puncturing Playa Vista’s underlying sediments, that access was supposed to be preserved to, (but were recklessly bulldozed by the developers), provide many channels for both sources of gas to escape-particularly during an earthquake or tsunami when escape routes for Phase 1 residents (and incoming rescue equipment) are most likely to be blocked. Gas leaking through water was demonstrated during construction of Phase 1 with no apparent comprehension on your part. A number of us believe increased coverage of the site, and untested liners beneath new buildings are likely to trap gas, then fail, and cannot be replaced without complete demolition... and residential buildings in existing Playa Vista Phase 1 will ultimately be abandoned & demolished (hopefully before a class action wrongful death suit from these toxics bankrupt the city).

Response 211-3

As discussed in Subsection 2.2.1.1.1 of Section IV.I, Safety/Risk of Upset, of the Draft EIR on page 672, the Southern California Gas Company owns the reservoir used for natural gas storage, which is situated approximately 1.25 miles west of the Proposed Project site, on the north and south sides of the Ballona Channel at a depth of more than 1 mile (approximately 6,200 feet) below the surface. The Proposed Project is not “on top” of this facility.

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

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

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

There are no oil or gas wells within the Proposed Project site.

Soil gas issues are addressed in Subsections 2.2, 3.3, 3.4 and 4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR. This issue is also addressed in Topical Response TR-12, Soil Gas, on page 477.

Impacts from seismic hazards, including liquefaction, are addressed in Subsection 3.4.1.3 of Section IV.A, Earth, of the Draft EIR on page 254. As discussed in Subsection 3.4.1.3, seismic hazards include groundshaking and rupture, tsunami/seiche, liquefaction, lurching, and slope stability. No evidence of surface or shallow subsurface faulting has been found at the Playa Vista site; therefore, the potential for surface rupture is considered extremely low. There have been no historic tsunamis generated from local offshore earthquakes. The maximum expected run up from a tsunami wave in the Project site is 7.9 feet above mean sea level in a 100-year interval, which is approximately 0.9 foot higher to 16.1 feet lower than the existing elevations throughout the Project site. There are no waterbodies near the Project site that would cause a seiches hazard. There exists limited liquefaction potential, based on geotechnical investigations completed at the Proposed Project site. As part of the issuance of building permits by the City's Department of Building and Safety for individual structures, site-specific geotechnical investigations are required. Given that the City's Department of Building and Safety requires site-specific investigations (including liquefaction risk assessment) prior to construction, and the application of engineered fill soils in building pads would address the potential for liquefaction directly under structures, impacts to the Proposed Project from on-site liquefaction are considered less than significant. No evidence of potential lurching hazards was found at the Project site. If lurching were to occur, it would only occur at the surface at the Bluffs; therefore, no substantial damage to structures is anticipated. Slope stability would only be an issue at the Bluffs, and these areas will not be developed with structures. All these seismic related hazards were found to be less than significant.

Comment 211-4

3) There has never been an effective transit plans to eliminate the car traffic Playa Vista generates. The best cure for this is not to ever build in greenfields like La Ballona, not to build near L.A.X. where air & water quality is worst, not to build where traffic congestion is already the worst on the westside, not to build where air traffic may increase and the airport may be reshaped to expand to attract even more ground traffic! But if development must take place here, as we discussed in Sierra Club Angeles Chapter Transportation Committee, no development of this magnitude should ever be permitted without high-capacity mass transit service going through the middle of it - as a precondition. Long before the State's current fiscal meltdown, transit agencies-even the giant L.A. County M.T.A., have been scrambling for funding; 100% Playa Vista's lines need to be completely paid for (construction, equipment, plus a transit trust, whose dividends would fund operations) by the developer-before any construction starts. What Playa Vista offers is an internal fixed route circulator that goes nowhere but in circles-a time-tested "solution" that never works, (scripted by those who would never be caught dead riding it themselves) that takes huge subsidies to run.

On Southern California Transit Advocates' latest study tour, we rode similar lifeline bus service in Riverside county whose route map between trailer parks and a transit center at a large mall looked like a plate of spaghetti, that picked up exactly one passenger (the driver greeted by name). Had there not been 11 of us on the study tour, farebox recovery for this run (the weekday after thanksgiving-busiest shopping day of the Christmas season) would have been a disaster... The waste of labor to open this kind of circulator is intolerable when S.C.A.G. tells us only 4% of

trips in all of L.A. County are taken on any form of transit! Circulators' main weaknesses are: they force unnecessary waits and transfers to the outside world (a rule of thumb is a 50% loss of potential passengers with each transfer!), they do not reflect the travel realities of southern Californians (long distance, cross-county trips), they do not coordinate their headways or span of service with large agencies, munis, or other circulators they connect to, and additional fare is often required.

Response 211-4

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, to obtain additional details on the elements of the transit improvement program that Playa Vista is proposing and the potential market that exists and will exist after the Playa Vista site is developed.

Comment 211-5

Minimally, the developer should be required to bear the full cost of extending M.T.A., Santa Monica Municipal, and Culver City bus lines inside and through its development as a precondition of approval.

Response 211-5

The Proposed Project would provide six buses plus operating and maintenance costs over a 10-year period, and expanded intelligent shuttle system, transit priority systems and associated signal system improvements to ensure a high degree of success in the utility of this alternative mode of transportation. All the elements of this transit improvement plan have been coordinated working closely with the City of Culver City, Culver City Bus, and the City of Los Angeles Department of Transportation.

Comment 211-6

Ideally, the developers should be required to pay for construction and a rail trust fund to operate rail lines through their development. 2 rail lines originally crossed La Ballona—S.P. along Alla, and the Pacific Electric at Culver Boulevard should be pwt [sic] back—probably somewhere near their original locations—Alla to reach Venice (and downtown Santa Monica), and Culver to downtown Culver City, L.A., and south bay beaches. Some of us on Friends of Green Line want a direct line between L.A.X. and Lincoln in Santa Monica. Mixed-use Transit Oriented Development should be located around a Playa Vista station/transit center for built-in ridership.

Response 211-6

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A comprehensive transit mitigation plan has been developed working closely with the Cities of Los Angeles and Culver City and the Culver City Bus. Please see Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455, to obtain additional information on the transit improvement elements and their effectiveness.

The Lincoln Corridor Task Force recently completed its First Phase of a long term improvement study of Lincoln Boulevard corridor between LAX and Santa Monica. The Light Rail Transit alternative, among several other alternatives has been evaluated in this study. With implementation of the mitigation program discussed in the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR on page 216, the Proposed Project would not have any significant traffic impacts. Nevertheless, as discussed on page 7 of Appendix K-1 of the Draft EIR, in the event the Lincoln Corridor Task Force adopts a set of regionally superior traffic improvements that are equivalent or superior in mitigating the project-related traffic impacts of the Proposed Project, prior to implementation of the Proposed Project or its mitigation measures the City may require the Proposed Project to contribute towards the implementation of the Task Force's improvements in an amount not greater than the Project improvements being superceded.

Comment 211-7

4) Some high percentage of occupancy of Playa Vista Phase 1 should be required before any work is permitted on Phase 2! Because Phase 1 is nowhere near full, we have little idea of the actual traffic gridlock and pollution that awaits us when they are. Without hundreds of millions in state, county, and local government subsidies, none of Playa Vista would ever have been built. But Playa Vista is filling very slowly. It is time to prove whether Playa Vista can stand on its own as a worthwhile use of resources and investment of our tax dollars, and prove its value without one more dollar of subsidy.

Response 211-7

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The First Phase Playa Vista Project is included in the Draft EIR as Related Project No. 40 for purposes of cumulative impact analysis. A complete description of the traffic impact analysis methodology, including identification of the baseline, is contained in Subsection 3.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445.

LETTER NO. 212

J. Michael Uszler, M.D.
5732 Kiyot Way
Playa Vista, CA 90094
(310)745-4779

Comment 212-1

As a resident of Playa Vista I speak for approving The Village at Playa Vista! Shops, restaurants, dry cleaning, and yes, coffee shops are a big part of what makes a group of homes and parks a real community.

Their being closely available to us will minimize a lot of extra driving around that we are presently doing. I know because I have lived in Playa Vista for a year, and I have to drive off the premises for every service! Think about the shops and restaurants close to your home and how important those are to you.

All of us at Playa Vista need The Village.

I request its approval. If you have any questions regarding this matter, please call me.

Response 212-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 213

Marshall E. Uzzle

Comment 213-1

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

Response 213-1

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

LETTER NO. 214

Dan and Nancy Valenzuela
746 Milwood Avenue
Venice, CA 90291

Comment 214-1

I write today to express my support for The Village at Playa Vista.

For years, we have heard about the jobs/housing imbalance on the Westside. There are three jobs here for every home, so people commute from all over Los Angeles County and beyond to get to their jobs in Santa Monica, Westchester and El Segundo.

When I first learned about the Playa Vista project, I was disappointed that it was to include large office buildings and a hotel that would create more jobs without providing enough housing. I am very happy to hear that the latest proposal (The Village at Playa Vista) includes very little office or commercial and focuses on our desperate need for more housing.

It seems counterintuitive to reduce traffic by constructing more places for people to live, but it is true. If quality and affordable housing is available near where the jobs are, workers will choose to live there and shorten their commutes, thereby taking people off the freeways.

Playa Vista won't solve all of the jobs/housing issues we face, but if the city encourages this and more residential development on the Westside, we will continue to address what many believe is our biggest challenge in Los Angeles.

Response 214-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 215

Tim Vargas
7845 Flight Avenue
Los Angeles, CA. 90045

Comment 215-1

I do not want to lose the beautiful view from the bluffs! We used to watch the fireworks from up there, and I would stop up there when I was riding my bike.

I have also noticed the great rock formations of the cliffs. The native [A]mericans deserve more respect than that! [A]nd what about the animals they were there first! I am against anymore building in that natural area. [P.S.] And [t]he traffic goes without saying!... your friend tim vargas

No More Buildings!

See following page for photo.

The ballona wetlands: Keep it alive!

Response 215-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

The Draft EIR has fully analyzed the potential impacts mentioned in the comment and recommended mitigation measures to reduce potential impacts, consistent with CEQA guidelines. The Draft EIR provides a detailed analysis of visual impacts in Section IV.O, Visual Qualities (Aesthetics and Views) on page 1148, a detailed analysis of archaeological resources in Section IV.P.(2), Archaeological Resources on page 1199, a detailed analysis of biological resources in Section IV.D, Biotic Resources on page 523, and a detailed analysis of traffic in Section IV.K.(1), Traffic and Circulation on page 798. See also Sections II.27, II.29, II.7, and II.15, respectively, of the Final EIR, for corrections and additions to these sections.



LETTER NO. 216

Martha Villalobos
13163 Fountain Park, #B-231
Playa Vista, CA 90094

Comment 216-1

I am writing in support of Playa Vista's plans for The Village.

Having lived in the Fountain Park Apartments at Playa Vista for over a year, my husband and I are excited about the prospects of moving into a new home in The Village.

The homes in the first phase were snapped up so quickly that we have very little chance of purchasing a home at Playa Vista unless The Village is built. Like many other people who are familiar with Playa Vista, we were attracted by its Westside location, proximity to a variety of parks and other amenities and, of course, the fact that all the homes are brand new.

If demand for the homes at Playa Vista is any indication, The Village will be wildly successful. Please approve The Village so that we can become homeowners in a neighborhood we already enjoy!

Response 216-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 217

Leila Visram
13163 Fountain Park Drive, #B115
Playa Vista, CA 90094

Comment 217-1

As a current resident of Playa Vista living in the Fountain Park Apartments, I strongly encourage the City of Los Angeles to approve the Environmental Impact Report for The Village at Playa Vista.

Since the EIR was released, Playa Vista and the State of California came to agreement on the sale of land west of Lincoln and north of the Ballona Channel for preservation as open space. The Village will complete the “smaller and greener” development that its executives promised when the NOP was released last year.

The Village also reflects a strong commitment by the developer to creating a development with numerous community benefits. The current Playa Vista residents need the shopping outlets, grocery store, coffee houses and restaurants so that we won’t need to drive outside the community to complete daily errands and trips. We could walk or take the shuttle in to the Village to shop or have dinner. The Village will also bring more new parks that can be enjoyed by people throughout the area.

Response 217-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 218

Seema Visram
7301 West Manchester Avenue, #115
Los Angeles, CA 90045

Comment 218-1

I live in Westchester, and I strongly encourage the City of Los Angeles to approve the Environmental Impact Report for The Village at Playa Vista. The Village is necessary to complete the Riparian Habitat Corridor portion of the Freshwater Wetland System and restore the Westchester Bluffs on the southern part of the property. In total, approximately 23 acres will be dedicated to habitat protection and open space within the development. All of this will provide critically needed open space for the community.

The Village will also be a welcome addition to our community by providing the shopping outlets, grocery store, coffee houses and restaurants for Playa Vista's residents and the surrounding community. The town center will provide valuable services within close proximity to the people who need them, so that Playa Vista residents, visitors and employees won't need to drive outside the community to complete daily errands and trips.

Response 218-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 219

Jeanette Vosburg
4124 East Boulevard
Los Angeles, CA 90066

Comment 219-1

Please register my opposition to Phase II of the Playa Vista Development. I expressed my opposition to Phase I. After reviewing the Report prepared by Exploration Technologies, Inc (Victor Jones) for the City of Los Angeles Department of Building and Safety updated August 10, 2001 all of my worst fears as a nearby resident were confirmed.

I believe that the City withheld from the Chief Legislative Analyst Report facts so damaging it was at a minimum, a dereliction of duty and possibly a criminal act on the part the Chief Legislative Analyst, the Planning Department, the City Council and the Mayor. I believe if there is an explosion or exposure to toxic oil field gas at Playa Vista, the City of Los Angeles will end up having to tens of millions of dollars in lawsuit settlements to the injured parties.

Playa Capital has publicly claimed that there is no liability to the taxpayers of Los Angeles. If this is their legal position, then the City should as part of this new approval process demand that Playa Capital formally indemnify the City from any future claims associated with explosion or exposure to toxic oil field gas at Playa Vista.

Response 219-1

A detailed discussion regarding methane is provided in Subsection 2.2.4 of Section IV.I, Safety/Risk of Upset, of the Draft EIR starting on page 700. This issue is also addressed in Topical Response TR-12, Soil Gas, on page 477.

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

regarding the issues addressed during the CLA's review process. The CLA Report (Appendix J-6 of the Draft EIR) concluded that methane at Playa Vista appears to be related primarily to a deep thermogenic source and is not associated with the Del Rey Hills gas storage field.

This comment will be noted and incorporated into the Final EIR for review and consideration of decision-makers.

Comment 219-2

As another aspect of this development, I would like to point out that traffic mitigations are dubious at best and non-existent for many of the "spill over" residential streets. Even now, before we feel the full effects of Phase 1, people are avoiding existing gridlock by driving through residential areas. This will get much worse if we support additional construction at Playa Vista.

Response 219-2

With mitigation, the Proposed Project would not result in any significant traffic impacts. A new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15, Corrections and Additions, of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue/Jefferson Boulevard identified in the Draft EIR. In order to protect neighborhood streets, an analysis was done to address neighborhood and cut-through traffic. Subsection 3.4.7 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 872, presents an analysis of potential neighborhood impacts that could be caused by project traffic. Additional details of this analysis can be found in Appendix K-2, Traffic Study Appendix Volume 1D, and Topical Response TR-5, Neighborhood Traffic Impacts, on page 458.

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September, 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December, 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.

Comment 219-3

It makes no sense to approve Phase II when the impacts of Phase I are only beginning to be felt. Why rush to approve Phase II before completion of Phase I?

Response 219-3

The Draft EIR provides a comprehensive analysis and discussion of the Proposed Project's environmental impacts. The First Phase Playa Vista Project is included in the Draft EIR as Related Project No. 40 for purposes of cumulative impact analysis. A complete description of the traffic impact analysis methodology is contained in Subsection 3.0 of Section IV.K.(1), Traffic and Circulation, of the Draft EIR on page 828. Please see Topical Response TR-1, Playa Vista Transportation Model, on page 445 for a discussion of the traffic model methodology.

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Comment 219-4**ATTACHMENT**

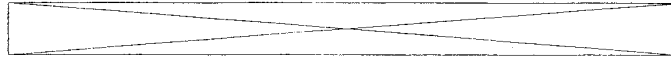
Executive Summary, Report Prepared By Exploration Technologies, Inc. See following pages.

[Regional Geochemical Assessment of Methane, BTEX, CO₂ and H₂S Gas Occurrences
Playa Vista Development
First and Second Phases
Los Angeles, California

Prepared for: City of Los Angeles Department of Building and Safety
July 10, 2001]

Response 219-4

The attachment provides a July 10, 2001 report, entitled Regional Geochemical Assessment of Methane, BTEX, CO₂ and H₂S Gas Occurrences, prepared by Exploration Technologies, Inc., and supports comments in the preceding sections of this letter. As such, this comment is addressed in Response 219-1.



Last Updated 08/10/2001

**REGIONAL GEOCHEMICAL ASSESSMENT OF
METHANE, BTEX, CO2 and H2S GAS OCCURRENCES**

**PLAYA VISTA DEVELOPMENT
First and Second Phases
Los Angeles, California**

Prepared for:

**CITY OF LOS ANGELES
DEPARTMENT OF BUILDING AND SAFETY**

July 10, 2001

TABLE OF CONTENTS

EXECUTIVE SUMMARY

1.0 INTRODUCTION

1.1 LOCATION

1.2 PREVIOUS WORK

1.3 SCOPE OF WORK

2.0 RESULTS AND INTERPRETATION

2.1 SOIL GAS METHANE

2.2 SOIL GAS ETHANE, PROPANE, BUTANES

2.3 SOIL GAS HYDROGEN SULFIDE

2.4 SOIL GAS CARBON DIOXIDE

2.5 SOIL GAS BTEX

2.6 CENTINELA CREEK BUBBLING SEEP SAMPLES

2.7 RIPARIAN WETLANDS CORRIDOR SEEPS

2.8 INFILL DETAIL SOIL GAS IN 49104-01

2.9 BALLONA GRAVEL STRUCTURAL MAPS

3.0 SUMMARY AND CONCLUSIONS

4.0 RECOMMENDATIONS

5.0 REFERENCES

LIST OF FIGURES

Figure 1. Location of Playa Vista Development

Figure 2. Playa Vista Development Planning Areas

Figure 3. Playa Vista Development Phase 1 Product and Lot Numbers assigned to specific properties, color coded according to planned construction completion dates

Figure 4. Product 700 Macroseep Venting Locations. Artificial flux observation stations were installed within the area defined by some of the largest soil gas anomalies. T represents trench wells and FW represents 24" diameter, 10 foot deep gas flux wells, TV represents temporary Ballona gravel vent wells

Figure 5. Backhoe excavations of Trench1, on the left, and Trench 2 on the right are shown when first installed on Dec. 4, 2000. Excavated to only to 36 inches they did not intersect the water table, so a few inches of water were added in order to look for gas bubbles.

Figure 6. Flux observation well FW-07, referred to as "Mr. Bubble", was installed on Dec. 2, 2001 with a 24 inch bucket auger to a depth of about 10 feet. Close observation indicated that most of the bubbles were entering the well from the sides of the borehole.

Figure 7. For longer term observation of the bubble activity, FW-07 was filled with coarse gravel to near the top of the water and cased only in the upper portion with a 24 inch PVC casing. The casing insured that the EPA flux chamber used for measurement could be inserted in a repeatable manner and also protected the flux well.

Figure 8. A typical large magnitude bubble stream from the Product 700 area, as commonly observed following a major rainfall event that occurred on Feb. 15, 2001.

Figure 9. FW-09 was installed on Jan 20, 2001 at the location of one of the largest natural seeps observed following a major rainfall event that occurred on Jan. 12, 2001. Initially found by Dr. Paul Witherspoon, this well was often referred to as the "Paul" well.

Figure 10. A site inspection of the "Paul" well was made on Jan. 23, 2001 by LADBS personnel, from left to right, Colin Kumabe, Precilla Ortiz and David Hsu.

Figure 11. A 40,000 pound CPT truck was used to install a series of gas vent test wells in the Product 700 area on Jan. 21, 2001

Figure 12. The 1 inch diameter CPT rods are pushed to refusal in the underlying Ballona gravels in order to determine the depth to the "Top of Gravel"

Figure 13. A view of the hydraulic system inside the CPT truck, the drive rods are disconnected and the nitrogen injection hose inserted.

Figure 14. Making a connection by adding a rod inside the CPT truck

Figure 15. CDM Engineer Jay Accashian testing a TVW vent well on Jan. 21, 2001 for subsurface evidence of free gas pockets in the gravel aquifer. Details describing this testing procedure are contained in Appendix C.

Figure 16. Following a backhoe accident, the "Paul" well was still flowing as of Jan. 24, 2001. An attempt to clean out the well using the 24 inch bucket auger caused the gas flow to be reduced to about 2 liters per minute.

Figure 17. On May 16, 2001, the "Paul" flux well FW-09 was still active, and remained active until destroyed by CDM in June 2001.

Figure 18. CDM Engineer Jay Accashian holding an EPA flux chamber that was used to provide a series of gas flux measurements on the site. These measurements began in early December under the direction of Dr. Chuck Schmidt.

Figure 19. The EPA flux chamber is placed on the ground and flushed with nitrogen at a rate of 5 liters/minute. The concentration of gas entering the chamber through the bottom can then be accurately calculated.

Figure 20. The EPA flux chamber was placed directly over a live macroseep, which forms a visible bubble stream, which can be seen inside the chamber. An active stream of bubbles such as this typically produces a flow rate of about 2 standard cubic feet per day.

Figure 21. The EPA flux chamber was used on Dec. 4, 2001 to calculate the gas venting flow rate across the water interface in one of the trenches that was excavated and filled with a water seal for observation of gas bubbles.

Figure 22. An area of intense seepage observed in an area that was not surveyed by the soil gas survey lies within the riparian wetlands corridor just north of Teal street. Multiple seeps photographed on May 16, 2001 can be seen spread over a 20 by 30 foot area within an existing drainage ditch.

Figure 23. A close-up view of one of the more intense seeps shown in Figure 22, above. A free gas sample collected from this seep on March 16, 2001 by volume displacement contained 94% methane and 3800 ppmv of ethane. The methane and ethane stable carbon isotope values were -56.04 and -34.40 parts per mil.

LIST OF PLATES

Plate 1. Soil Gas and Macroseep Sampling Locations
Plate 2. Methane Concentrations Contour Intervals 150000, 12500, 1000, 100, 30 10 (ppmv)
Plate 2a. Methane Concentrations Contour Intervals 10000, 100, 10, 8, 6, 4, 2 (ppmv)
Plate 3. Ethane Concentrations Contour Intervals 300, 3, 1, 0.5, 0.3 (ppmv)
Plate 3a. Ethane Concentrations Contour Intervals 1500, 500, 300, 150, 75, 50 (ppbv)
Plate 4. Propane Concentrations Contour Intervals 10, 3, 1, 0.5, 0.3 (ppmv)
Plate 4a. Propane Concentrations Contour Intervals 750, 300, 150, 75, 50, 25 (ppbv)
Plate 5. Iso-Butane Concentrations Contour Intervals 5, 1, 0.250, 0.100, 0.050 (ppmv)
Plate 6. Normal Butane Concentrations Contour Intervals 0.750, 0.500, 0.250, 0.100, 0.025 (ppmv)
Plate 7. Hydrogen Sulfide Concentrations Contour Intervals 1, 0.30, 0.050, 0.020, 0.01 (ppmv)
Plate 8. CO2 Concentrations Contour Intervals 10, 7.5, 5.0 (%)
Plate 9. Toluene Concentrations Contour Intervals 0.50, 0.40, 0.30, 0.20, 0.10 (ppmv)
Plate 10. Total Xylenes Contour Intervals 0.50, 0.40, 0.30, 0.20, 0.15 (ppmv)
Plate 11. Summary of Playa Vista Methane Stable Carbon Isotope Analyses
Plate 12. Infill Detail Soil Gas Sampling Locations
Plate 13. Infill Detail Methane Concentrations
Plate 14. Infill Detail Ethane Concentrations
Plate 15. Infill Detail Carbon Dioxide Concentrations
Plate 16. EPA Flux Chamber Measurements Posted on Detailed Methane Contour Map
Plate 17. CDM Top of Gravel Map
Plate 18. ECI Top of Gravel Map
Plate 19. Combined CDM/ECI Top of Gravel Map

LIST OF TABLES

Table 1. Summary of Light Gas Analyses, 4-foot Soil Vapor Survey
Table 2. Summary of BTEX Analyses, 4-foot Soil Vapor Survey
Table 3. Summary of Hydrogen Sulfide Analyses, 4-foot Soil Vapor Survey
Table 4. Summary of Carbon Dioxide Analyses, 4-foot Soil Vapor Survey
Table 5. Summary of Playa Vista Methane Stable Carbon Isotope Analyses
Table 6. Summary of BTEX Analyses for 50-Foot Gravel Monitor Wells
Table 7. Summary of CPT Probe Testing
Table 8. Summary of Methane, Ethane and CO2 MTI-GC Field Screening Data
Table 9. TVW Vent Wells

LIST OF APPENDICES

Appendix A. Field and Laboratory Procedures for Soil Vapor Sampling
Appendix B. Collection of Free and Dissolved Gases from Monitor Wells
Appendix C. CDM Installation and Testing Procedures for TVW Gas Venting Wells

Appendix D. Derivation of Flux Equations and Flux Data

EXECUTIVE SUMMARY

Near surface soil gas surveys conducted at Playa Vista have revealed anomalous concentrations of hydrocarbon gases, at a depth of 4 ft, within significant portions of Tracts 49104-01 and 49104-02. The largest magnitude anomalies ($> 12,500$ ppmv) make up a very small part, only 1.5%, of the 1087 acres in the Playa Vista project. Nearly two thousand samples of soil gas from these tracts have been collected and analyzed. Methane occurs in concentrations as high as 100%, and all of the larger magnitude seeps also contain associated ethane, propane, and butanes, definitive indicators of a thermogenic source.

Dramatic evidence of the magnitude of the gas flows has been evidenced by intense bubble activity in a large flooded area of Tract 01 following the heavy rains in January 2001. Bubbles were observed erupting from the water surface directly over the region where the soil gas survey contained the highest methane concentrations. At one location, the flow was intense enough to raise the surface of the water a few inches above its surroundings in the form of a low frothy fountain. An observation well (FW-09) installed at this location was found to have a natural flow rate of 9 liters/minute, and in spite of construction related changes, remained active until destroyed in late June of 2001.

The result of this investigation indicates that natural gas steadily migrates upward through the sediments to the surface at Playa Vista. This is the result of an advective pressure, upwards of 20 psig in the gravel aquifer, driving the methane gas to the surface. Another independent indication of the steady migration was obtained from investigations of bubbling seeps in the streams at the confluence of the Centinela and Ballona Creeks and in the riparian wetlands corridor that trends westerly along the base of the bluffs. Samples of gas bubbles collected more than seven years earlier from Centinela Creek were found to have essentially the same composition as that of the methane gases collected in these surveys. Thus, bubbling seeps in streams are present on both the north and south sides of the Playa Vista soil gas anomalies. The results from Centinela and Ballona Creeks confirm that this has been going on for many years and are an indication that effective paths of migration have been established in the subsurface.

An extensive program of drilling and testing of vent wells and monitor wells was carried out within the upper 50 feet of sedimentary cover underlying these gas-charged areas in an effort to characterize the nature and source of these thermogenic gases. One of the most important layers investigated is the Ballona Gravel Aquifer, located at a depth of about 50 ft. This gravel bed contains accumulations of the same thermogenic gases, under essentially the same area as defined by the soil gas survey. In an attempt to measure flow rates and deplete these shallow gas accumulations, over 120 vent wells were installed (mostly in Tract 01) on the largest soil gas anomaly. This effort was essentially a failure because of the weakness and fluidity of these former Los Angeles River sediments, which were too easily disturbed by the drilling operations and the flow of gas, water and sediments towards the well screens, plugging the well screens and preventing the

installation of effective vent wells, even when free gas was encountered. The gas pockets were also found to be too erratic to be predictable (for example, three vent wells were drilled within 10 ft of the actively venting macroseep at FW-09, with none of them able to produce gas). Other examples are cited in the text.

The origin of this natural gas is very likely from the Pico sands, that have been found to have gas shows in the interval from 500 ft to 3,000 ft in each of five exploratory wells drilled on Playa Vista property in the 1930's. One of these wells, the Universal City Syndicate Inc. LTD #1, had a blowout in 1930 while drilling at 1831 ft in the Pico Formation, and produced gas at an estimated rate of 5,000 MCF per day. This well was subsequently drilled to 5,960 ft and plugged as a dry hole in 1931. During re-abandonment operations, completed in June 2001, four gas samples were collected at depths ranging from 668 ft to 760 ft near the base of the fresh water zone. The composition of this gas was found to be very similar to that of the methane gas collected by the soil gas survey and from the monitor and vent wells. No significant gas shows were found below the base of the fresh water in this well during the final plugging and abandonment of this well, indicating that the Syndicate well is not the source of the gas.

It is significant that natural gas was discovered at depths of 1,500 ft to 4,700 ft, in the Pico and Repetto sands of the El Segundo field, which is on a similar structural trend only 4.5 miles southwest of Playa Vista. The analyses of two Pico gas samples from this field show that they are very similar to the thermogenic gases at Playa Vista. This field has produced about 23 billion cubic feet of gas, giving an indication of the possible magnitude of the gas accumulations that could, or may have existed beneath Playa Vista.

An independent assessment has been made of the geological and geophysical characteristics of the formations at Playa Vista in an effort to understand the nature of the structure and stratigraphy of the subsurface gas sources and the gas migration pathways. A high-resolution 2D seismic line, located along Jefferson Boulevard provides an image of the shallow subsurface down to a depth of about 2,000 ft. A 3D seismic survey was also carried out to image the deeper section, extending to about 8,000 ft.

A specific problem that required attention was the proposed existence of the Lincoln Boulevard Fault that was postulated to dip in a westerly direction down toward the gas storage reservoir (operated by Southern California Gas Company). A very careful review of the information from the 2D and 3D seismic surveys does not show any evidence that such a west-dipping fault exists. Corroborative evidence has also been obtained from an investigation of the composition of the gas in the storage reservoir, which proves that the Playa Vista gases are unrelated to the gases from the storage field. Thus it can be concluded that there is no postulated fault migration pathway for storage gases to migration from the storage reservoir located at a depth of about 6,200 ft and the Playa Vista site. Thus two independent methods provide collaborative evidence that the Lincoln Blvd. Fault, as postulated does not exist.

Unfortunately, the seismic data were not acquired in a manner and over a sufficient area to allow a definite conclusion to be drawn as to the exact nature of the subsurface

structures beneath Playa Vista. As a result, there are essentially two interpretations of the subsurface geologic structure and the nature of the paths of gas migration, as outlined in Assessment of Geological and Geophysical Characteristics of the Playa Vista Development Site and Integration with the Geochemical Observations by Anderson, Becker and Witherspoon, 2001. One involves a slump model in which 800 to 1,000 feet of strata have been disrupted during slumping of the valley wall that defines the southern boundary of the Ballona Creek floodplain. The surface along which slumping occurred cuts into the uppermost Pico sands. As a result of this truncation, the seal in the sand/shale sequences of this shallow section was breached, and a path for gas to migrate to the surface was provided. An alternative model involves interpreting the seismic data as reflecting a structure with a near-surface system of faulting/jointing that provides a mechanism for migration of gas from the middle and upper Pico sands. Drainage of gas from these sands would explain the very significant migration of gas at the surface of Playa Vista. Lineations observed in the surface gas anomalies may indicate fractures bounding major slump blocks that formed during gravity driven collapse of the valley wall into the deep valley. The main question to be answered is the depth, extent and origin of the fractures, however, neither model leads to a deep-seated "earthquake fault" that would cause structural damage.

Anomalous methane concentrations in the shallow sediments at Playa Vista, and the difficulties experienced in attempting to characterize the magnitude and nature of these gas accumulations present a significant and challenging problem. The presence of gas seeps requires building methane mitigation systems for any building constructed directly over the areas where anomalous concentrations of soil gas have been measured. In the interest of safety, no variances in these methane mitigation requirements should be allowed. Not only do these mitigation systems require extensive field-testing to determine their effectiveness in handling the gases venting naturally at Playa Vista before initial occupancy, in view of future seismic activity in the Los Angeles Basin, this effectiveness must be periodically reevaluated. The installation of real-time monitoring systems installed in the vent risers in the Playa Vista buildings could provide significant protection, provided that they are properly calibrated and demonstrated to be responding to the actual gas levels, which accumulate under the buildings foundations. This testing has not been done, and must be completed as part of the due diligence before occupancy.

Utility conduits, utility vaults and sewers contained within the streets and public right-of-ways are also subject to explosive gas concentrations. The building mitigation systems offer no protection, nor mitigation for this area of concern. The design of these features should be such that risk of explosion is minimized. ETI has never received any information from Playa Vista regarding the handling of methane problems associated with the utilities and suggest that this area be given due consideration.

1.0 INTRODUCTION

1.1 Location

The proposed Playa Vista Development (Site) encompasses about 1,087 acres approximately 15 miles west of downtown Los Angeles (McLaren Environmental

Engineering, May 8, 1987, ENSR, October 1997). The site is four miles south of the City of Santa Monica, 0.5 miles west of the City of Culver City, and approximately 1.5 miles north of Los Angeles International Airport. As shown by Figure 1, the Playa Vista Development is bounded by Marina del Rey on the north, Culver City on the east, Playa del Rey and Westchester Bluffs on the south, and Vista del Mar and Playa del Rey on the west. Playa Vista will be developed as an integrated, mixed-use, master-planned community composed of residential, commercial, recreational, and civic structures. Lincoln and Jefferson Boulevards are the major north-south and east-west traffic arteries, respectively, in the area.

The site has been subdivided into four planning areas, A, B, C, and D based upon the quadrants formed by the intersection of Ballona Channel and Lincoln Boulevard. These planning areas are shown in Figure 2. The proposed development of Playa Vista includes two major phases, as shown in Figure 2. Initially, only the western portion (Tracts 01, 02, 03, 05, and 06) of the Phase 1 area was surveyed. Lot and product numbers used to refer to specific building construction areas for these Phase 1 tracts are shown in Figure 3 for reference. The eastern portion of Phase 1 (Tract 04) was only recently surveyed along with the Phase 2 areas as part of this regional soil gas survey.

1.2 Previous Work

Exploration Technologies, Inc. (ETI) of Houston, Texas was originally retained in May 1999 by the Los Angeles Department of Building and Safety (LADBS) and Playa Capital to serve as "Peer Reviewer" regarding subsurface methane gas issues in the proposed Playa Vista Development in Los Angeles, California. The initial scope of work was to review and comment on previous studies/reports concerning methane at the Playa Vista Development (PVD). Following a review of the available data, and a meeting with the Playa Vista consulting experts on September 15, 1999, it was readily apparent that previous studies were not adequate, nor thorough enough to fully assess the occurrence of methane gas at the PVD due to limited sampling and analyses. Methane gas concentrations in groundwater from three zones had been measured in five monitor wells that had been installed in Tract 03 by Sepich and Associates (Sepich Associates Inc., April 2, 1999). The data from this assessment was included in the report by Integrated Environmental Services, Inc. (IES, May 28, 1999). These wells confirmed the presence of large methane concentrations in the 50-foot gravel aquifer. However, the results did not provide definitive methane content, nor adequate information about the source of methane in the aquifer.

Based on ETI recommendations, a preliminary subsurface methane assessment (ETI letter report, November 29, 1999) was conducted during October and November, 1999 over Tract 03 in the proposed Playa Vista Development. The location of this first soil gas data set collected by ETI is shown in blue on Plate 1 for reference to the other ETI soil gas data sets. Measurable concentrations of ethane, propane, and butanes were confirmed for the first time from Playa Vista soil gas and ground water samples following protocols set by ETI. Concentrations for all of these light gas components were noted to increase in

a southwest direction towards the University City Syndicate Inc. LTD #1 well, which at that time was considered as a possible source of thermogenic gas.

Geochemical results from the soil gas and monitor wells (dissolved gas in ground water, and free gas bubbles liberated from the ground water) indicated that the methane and other associated light hydrocarbon gases likely had a common, deep petrogenic source. Ethane, propane, iso-butane and normal-butane are never found associated with 100% biogenic methane gas (Coleman et al., 1977, Coleman, 1979, Coleman et al., 1981, 1988, Jones and Drozd, 1983, Jones et al., 2000, Jones and Agostino, 1998, Thompson, 1966). Thus, the presence of these four independent light gases indicated a definite thermogenic gas contribution, which clearly shifted toward the thermogenic end member to the southwest near the University City Syndicate Inc. LTD #1 well. Methane stable carbon isotopes analyses performed on free gas samples collected from each of the five monitor wells in Tract 03 also showed an increased thermogenic contribution of methane gas towards the southwest.

In contrast to earlier results reported by Playa Vista contractors, the light gas compositions of the free and dissolved gases obtained from the water wells were found to be nearly identical to those measured at four feet in the soil gas samples. Two previous soil gas data sets collected by CDM on September 21 and again on October 7, 1999 failed to report any ethane or propane, yet did report small quantities of butanes and pentanes (ETI letter report, November 29, 1999, CDM October 12, 1999 fax report). This compositional disagreement with the free gas in the 50-foot aquifer was the reason that ETI changed the soil gas protocol and collected an independent soil gas data set for evaluation of the 49104-03 area.

This initial ETI methane assessment conducted within Tract 03, involved sample collection of soil gas from the shallow subsurface and the collection of groundwater and free gas samples from a group of newly installed monitor wells screened in the 50-foot gravel aquifer. Following a review of this initial survey data, it was readily apparent that previous studies were inadequate for assessing the methane gas issue at the Playa Vista site due to limited and poorly done sampling and analyses.

Based on the results of this first survey within Tract 03, ETI designed and recommended a more regional assessment of the Phase 1 development area. This second, more thorough assessment was conducted between October 1999 to April 2000, and included the collection of 812 four-foot deep soil gas samples placed on a 100-foot grid spacing and 41 monitor wells, installed and sampled in the 50-foot deep Ballona gravel aquifer. Delays by Playa Vista and wet weather caused the monitor well portion of this second investigation to extend into early April of 2000. This second, more thorough assessment, directed and supervised by ETI, was successful in determining the nature, magnitude and distribution of methane gas in near surface soils, as well as in the 50-foot gravel aquifer located beneath the site in the Phase 1 area. This second ETI soil gas data set is highlighted in green on Plate 1.

ETI's second assessment report (Subsurface Geochemical Assessment of Methane Gas

Occurrences, Playa Vista Development, First Phase Project, Los Angeles, California) for the City of Los Angeles, Department of Building and Safety (LADBS) was issued on April 17, 2000, immediately following the collection and analysis of the monitor well data. Soil gas samples for both of these two surveys were collected by Scientific Geochemical Services in Casper, Wyoming and the analytical laboratory work was done by Microseeps Laboratory in Pittsburgh, Pennsylvania. Sampling and analytical protocols are given in the appendices to these first two reports. All stable carbon isotopes analyses were done by Isotech Laboratories in Champaign, Illinois.

Geochemical results from the April 17, 2000 assessment show two main areas of high methane concentrations (above 70% methane) in the west half of Tract 01 and the south half of Tract 02. Anomalous levels of ethane, propane, and butanes are also coincident with these main two methane seepage areas, indicating the methane is related to deeper thermogenic sources. Areas of anomalous methane concentrations dissolved in groundwater and methane from free gas in the groundwater from the 50-foot gravel aquifer are nearly coincident with the anomalous areas where ethane, propane and butanes was found in the soil gases. The coincidence of anomalous soil gas and ground water data further confirms that the methane is from a thermogenic source, which must lie beneath the gravel aquifer.

Evaluation of available Pico gas well data reported in the April 17, 2000 report, indicated that the source of the anomalous thermogenic methane was most likely from shallow natural gas within the Upper Pliocene Pico Formation. The presence of gas in these shallow natural gas sands was established from available driller's logs, and by the fact that the University City Syndicate Inc. LTD #1 well blew out and produced 5 million cubic feet of gas per day while drilling at approximately 1830 feet. In addition, the El Segundo field, which lies on the same geologic trend as Playa del Rey, produced over 23 billion cubic feet of dry gas from the Pico sands (Cordova, 1963; Wright, 1991). The chemical and isotopic composition of the El Segundo dry gases lie very close to those observed in the Playa Vista gravel monitor wells (Dennis Coleman, 2000, private communication). Coleman's isotope data from these El Segundo samples are listed in Table 5 for comparison with the soil gas and monitor well data.

The Playa del Rey Oil Field, and now Southern California Gas Storage Field lies immediately to the west of Lincoln Blvd. (Barton, 1931, Hodges, 1944 and Riegle, 1953). In order to determine whether or not this gas storage field had contributed as a source, ETI had suggested that additional studies needed to be conducted (ETI 1st and 2nd Progress Reports, 1999). The most important study required was to sample and analyze several of the gas storage wells from the field for comparison with the Playa Vista seepage anomalies, and the second most important study was to conduct a soil gas survey over the storage field. Nine of the gas storage and observation wells were sampled on September 5, 2000 by CDM (observed and assisted by ETI) and analyzed by Isotech Laboratory. A comparison of this chemical and isotopic data with the surface macroseeps and with the gas data from the Ballona gravel monitor wells has demonstrated that the gas storage wells are isotopically and chemically different, and cannot be the source of

the gases found in the surface macroseeps and in the Ballona gravel monitor wells.

1.3 Scope of Work

A regional soil gas survey was recommended in the first progress report issued on June 18, 1999, and was repeated in every subsequent report, including the April 17, 2000 report. This important objective was finally completed in January 2001. Including all of the data from the first two soil gas surveys completed in 1999-2000, a total of 1621 sites were used to construct a set of regional soil gas maps over the entire Phase 1 and Phase 2 areas of the planned 1087 acre Playa Vista Development. Soil gas samples for the regional data set were again collected at four-foot depths by Scientific Geochemical Services from Casper, Wyoming and analyzed by Microseeps Laboratory in Pittsburgh, Pennsylvania. Soil gas collection and laboratory analysis procedures are contained in Appendix A (see also ETI April, 17, 2000) for reference. Hydrogen sulfide (H₂S) was again measured in the field on soil gas samples using a Jerome 631-X instrument, manufactured by Arizona Instruments. Laboratory analyses of the light hydrocarbons, permanent gases, BTEX and H₂S are included in Tables 1, 2, 3 and 4 and individual component contour maps are shown in Plates 2 through 10. Concentrations of methane, ethane, propane, and butanes with detection limits of approximately 10 ppbv and BTEX at 70 ppbv are reported.

The additional regional soil gas sites collected by ETI are plotted in black on Plate 1, along with the soil gas data from the first two surveys. All soil gas sample sites for all three data sets were surveyed by Psomas & Associates. Although a 100-foot grid spacing was recommended by ETI, only the Phase 1 areas were sampled on this spacing, except in areas of recent surcharge or existing buildings. At the insistence of Playa Vista, the Phase 2 areas were sampled on a 300-foot grid spacing within Areas A, B, C, and D that had been sited for construction, and on a 500-foot grid spacing in the wetland portion of Area B. These variations in sample spacing are clearly shown on Plate 1. A high water table in the western part of the marshy area precluded sampling a large portion of this area. Additional detail on a 100-foot grid was later added between November 2000 and January 2001 around the sites in the Phase 2 areas where methane concentrations exceeded 1000 ppmv, and around some of the storage/observation wells of the Playa del Rey Gas Storage Field.

In addition to soil gases, free gas samples were collected from bubbling seeps located along Centinela Creek near the confluence with Ballona Channel and from the riparian wetlands corridor that lies just north of the south bluffs. These bubbling macroseeps are also plotted on Plate 1 with the soil gas data. Three individual seep samples, denoted as A, B and C, were collected from Centinela Creek by Walt Mersch (SGS) and Paul Witherspoon (LADBS Consultant) using an inverted funnel on October 20, 2000.

Another area of strong seepage where gas bubbles through water lies within the riparian wetlands corridor that runs east-west along Teal Street just north of the bluffs. A macroseep gas sample (denoted as seep 1, see Plate 1) was collected on March 16, 2001 just south of soil gas site 817 from this riparian wetlands corridor. Within the wetland

corridor several additional macroseeps were observed. This wetland area was not sampled during the earlier Phase 1 soil gas surveys because the area was off-limits for surface access. Additional survey data should be gathered throughout this wetland corridor in order to properly complete this regional assessment.

Data from these bubbling macroseeps was analyzed by Isotech Labs and has been compared with the previous isotope data collected and analyzed in 1993 by Global Geochemistry Labs. Seeps analyzed by Global Geochemistry were reported to have been collected near the confluence of the Centinela and Ballona channels, although no site location map exists for these samples collected by Global. Comparison of these two independent data sets shows that they are nearly identical in composition and suggests that the A, B, C seeps are probably the same seeps previously collected by Global.

Several additional bubbling seeps that have not been sampled were also noted along Centinela Creek during the October 20, 2000 reconnaissance. The locations of all of the seeps observed are shown on Plate 1. Because of accessibility, these other seeps were not sampled during this reconnaissance survey. Chemical and isotopic data should be collected from these additional seeps.

Advective gas flows were observed by means of visual observations made after flooding rains in the vicinity of most of the large magnitude soil gas anomalies. A series of shallow trenches and very shallow (5 to 10 foot deep) 24-inch diameter monitor wells were constructed in these areas for observation of the gas flux from these observation stations. More than 120 geoprobe Cone Penetrameter Tests (CPT boreholes) were installed in the vicinity of these active gas seeps by CDM working with LADBS consultant Dr. Gary Robbins in an attempt to vent the gas pockets contained within the upper 50 feet of sediments, and in particular near the top of the Ballona gravels. Summary data from these boreholes are listed in Table 7. The methodology developed for this testing is given in Appendix C.

In an attempt to improve the placement of these vent and monitor wells, additional infill soil gas samples were collected within the main seepage area located in area 49104-01. The data was collected using the exact same soil gas collection methods using ETI's four foot soil gas probe, however, in order to expedite turnaround and decision making the data was run in the field using a MTI field-portable gas chromatograph. This instrument has the ability to detect only methane, ethane and carbon dioxide, with detection limits of 10 ppmv for methane and ethane and 0.01% for CO₂. This data was used only for defining the variation of gas seepage anomalies within the 01 area where the largest macroseeps exist. All data within the calibration range of this instrument (i.e. 10 PPMV to 100%) are essentially of the same quality as the laboratory data. However, below the detection limit of 10 PPMV the field-screening data is bottom truncated. A few of these samples were analyzed in a laboratory GC with lower-level detection limits to verify the quality of this data. None of the infill samples were field screened for H₂S because no H₂S was found to be associated with the deeper methane sources. H₂S is clearly derived from surficial sources, and although it is a nuisance, it is not a deep source gas. A total of 303 infill soil gas samples were collected. This data is listed in Table 8 and site locations

are plotted in Plate 12. Contour maps for methane, ethane and carbon dioxide are plotted on Plates 13, 14 and 15.

2.0 RESULTS AND INTERPRETATIONS

2.1 Soil Gas Methane

The concentration of methane in soil gas (Table 1, Plate 2) is highly variable over the survey area. Values fall within the interval from background (<2 ppmv) to over 900,000 ppmv. The highest contour values shown on the methane map (Plate 2) are the upper explosive limit 150,000 ppmv (15%) and 25% of the lower explosive limit 12,500 ppmv (1.25%). These contour values distinguish areas where the concentration is above these two thresholds. These two thresholds are commonly used to define areas of greater concern, and were selected for this reason. However, it should be noted that these values are significantly below the highest values that lie between 25 to 98%. The lower values for contours on Plate 2 delineate the edges of the largest magnitude seeps. Such large contour cuts for methane emphasizes the large contrast with background areas, where no macroseeps even close to these thresholds have been found.

Large areas of seeps with anomalous methane concentrations (greater than 12,500 ppmv) are clustered in two main areas (Plate 2). One of these extends about 900 feet in the western part of Tract 49104-01. The second methane anomaly, which is more than 1000 feet long, is in the southern part of Tract 49104-02. The total area of anomalous methane concentrations (greater than 12,500 ppmv) covers only about 1.5% of the entire 1087 acre Playa Vista site. Smaller methane anomalies occur in the vicinity of, and north of these two large methane anomaly areas. Contoured anomalies appear to be controlled by some sort of subsurface geological influence that defines three principal directions, with azimuths of N 65 E, N 7 W, and N 62 W, suggesting some sort of subsurface geological control.

As shown by Plate 2, much lower methane concentrations were found in the Phase 2 (A, B and C) areas. Soil gas values within these three areas are more typical of normal soil gas concentrations, (Jones et al. 2000). Slightly lower threshold contour values on the second methane contour map (see Plate 2a) outline the much lower level soil gas anomalies observed within these three areas. On Plate 2a the areas of highest methane concentrations are truncated to only 10,000 ppmv (1%), which only slightly enlarges the most anomalous areas, again emphasizing the contrast between the background areas and these very large magnitudes associated with the areas containing the macroseeps. In order to show contrast within the background areas typical of areas A, B and C the contour values used were reduced to values ranging from 10 to only 2 ppmv. The lower contours used were 10, 8, 6, 4 and 2 ppmv. Both Plates 2 and 2a show the enormous contrast in magnitudes of normal soil gas concentrations measured in the background areas with those of the two main macroseep areas.

Soil gas concentrations within the 25% to 90% range at a depth of only four feet generally cannot be sustained without advective gas flow from depth. Methane is too

volatile to be sustained at these levels without a source. Advective gas flow has been confirmed within the vicinity of most of the large magnitude seeps by means of visual observations made after flooding rains, or in areas which are permanently water covered, or in water saturated areas that overlap the largest soil gas seeps.

Attention on the Product 700 area (see Figure 4) was initially focused by the observation of many bubbling macroseeps noted after heavy rains (Mike Reader personal communication, January, 2000). In order to evaluate this area of potential macroseeps under dry conditions, which prevailed when this work started, a series of shallow trenches (Figure 5) and very shallow (5 to 10 foot deep) 24-inch diameter monitor wells (Figure 6, 7) were constructed. Figure 4 shows the location of this construction area, along with the trench, flux and deep venting wells. The symbol T was used to denote a shallow trench and FW (flux well) was used to denote a 24-inch monitor well. Coarse gravel was placed within the 24-inch FW wells and a 24-inch PVC casing was used to cap these locations, which were installed in order to observe gas flux from some of the most anomalous soil gas areas. The trenches were dug only 36 inches deep using a backhoe and were then filled with water for gas bubble observations, since they did not penetrate the ground water table which was about 5 to 7 feet below surface in this area. The 24-inch FW wells did penetrate the ground water table adequately to allow observation for gas bubbles. Initial observations made before they were cased showed that the gases entered these flux wells more from the sides than from their bottoms, indicating that they did not intersect natural, vertical migration pathways, and would, in all likelihood stop venting when the shallow sands were depleted. They did, however, amply illustrate the tremendous gas charging of the shallow subsurface within the areas containing the larger methane concentrations.

Data from the analyses of gas samples collected by volume displacement on November 30, 2000 from the first two trench wells, T-1 and T-2 are listed in Table 5. As shown, methane ranges from 62.90% to 76.16%. These concentrations are in the same general range as the soil gases collected from four foot soil gas probes from this area. These trench samples were collected by volume displacement, with the venting gases displacing the water in the inverted bottles within seconds. Thus the bottles must contain 100% gas from the shallow sands, and could not have picked up any significant volume of air from the atmosphere during the sample collection. The presence of 23 to 36% air in these samples requires that the air had to be contained in the soil gas with the methane discharging from the shallow sands. The presence of air within such shallow gas filled sands would provide ideal conditions for oxidation of the hydrocarbon gases in-situ. The methane isotopes for these two samples are nearly identical at -59.30 and -59.28 parts per mil with respect to the PDB standard, and fit right in with the isotope values noted within the 50-foot Ballona gravel monitor wells. Thus, the methane contained in the gravel aquifer does not appear to have been further oxidized within this very shallow sand.

The ethane isotopes, on the other hand, are the heaviest values found on the site, out of over 80 individual analyses. The ethane from these two trenches have the very heaviest ethane isotope values found to date, of -17.94 to -13.62 parts per mil with respect to the PDB standard, suggesting very degraded (oxidized) ethane. In contrast, the ethane in the

50-foot deep Ballona gravel monitor wells is much lighter, although it is still fairly heavy when compared to typical reservoir values, which normally range from about -29 to -32 parts per mil. The monitor well gas has ethane isotopes ranging from about -18 to -21 parts per mil, and is also unusual. Such heavy ethane isotope values in the trench samples would suggest severe degradation, either very near the surface, or somewhere along the migration pathway taken by these gas seeps. Because of the large free gas discharge rates (liters per minute) from these two shallow trenches it would be impossible for the air to be a sampling artifact. This air must have naturally diffused into the shallow sediments where it mixed with the methane gas from depth, and was then discharged with the seepage gases when the surface cover was removed by digging and installing the trenches.

In October/November of 1999 very large magnitude soil gas anomalies were initially found at sites S77 and S78 within area 49104-03. The methane and ethane concentrations and stable carbon isotopes of these gases were as follows:

Site	Methane %	Ethane ppmv	Methane Delta C12/13 parts per mil	Ethane Delta C 12/13 parts per mil
S77	70.66	2400	-58.74	-20.57
S78	56.32	2900	-52.46	-19.92

These concentrations and isotope values are fairly close to those observed in the gravel monitor well MMW77 that underlies these soil gas anomalies (see Plate 11 from the ETI April 17, 2000 report). The reported values in this well were:

Site	Methane %	Ethane ppmv	Methane Delta C12/13 parts per mil	Ethane Delta C 12/13 parts per mil
MMW77	89.02	3400	-59.95	-20.49

Both compositional and isotopically the larger soil gas sample (S77) is very similar to the dissolved gases in the gravel aquifer 50 feet below the surface. The CO₂ soil gas values for these two samples are 5.56 and 16.65%, indicating an increased level of degradation for S78 over S77. This degradation appears in both the methane and ethane isotopes, but is clearly greater for S78.

In August 2000 a second survey was conducted over this same area following the installation of the concrete pilings for construction of the foundation of the Fountain Park Apartments (Concentration Of C1-C4 Gaseous Hydrocarbons, BTEX Aromatic Hydrocarbons, Carbon Dioxide And Hydrogen Sulfide In Soil Gas At Tract-03 Beneath Fountain Park Apartments Following Installation Of Concrete Pilings, March 14, 2001). The anomaly defined by these two sites (S77 and S78) was used as a test control area, during the August 2000 survey because it is located outside of the apartments, and therefore outside of the influence of the concrete piles. On resurvey, the 75% magnitudes had changed, values that had been as high as 75% now ranged only to 25%. Two of the largest magnitude sites found within this anomaly on the second survey were 5011 and 5018. The measured concentrations for these sites on resurvey were:

Site	Methane	Ethane	Methane Delta C12/13	Ethane Delta C 12/13
------	---------	--------	----------------------	----------------------

	%	ppmv	parts per mil	parts per mil
5011	25.33	1100	-51.63	-16.83
5018	10.16	400	-45.09	-14.37

Because of somewhat drier conditions, this reduction in magnitude was suggested to be related to the reduction in moisture content increasing permeability of the near-surface vadose zone. In spite of this reduction in relative magnitude, the presence of advective flow at this location was later confirmed using the EPA flux chamber technology on March 16, 2001. Measured gas flux ranging as high as 9313 mg/cubic meter was reported (Sepich Associates, Soil Gas Investigation for 5457 S. Brisa St., March 29, 2001).

As with the trench samples, it is apparent that the gases at depth in the gravel aquifer are being altered by oxidation effects that occur whenever these gases migrate to the near-surface. These examples demonstrate that both the methane and ethane isotopes can be altered by biological degradation. It is possible that changes in these isotopes, which are related to exposure to oxygen sources, might be useful for separating gases that migrate directly from the gravel aquifer from those that have an appreciable residence time in the very near-surface where the degradation changes mainly occur. This would require very discrete and controlled samples collection from various depths.

In January of 2001 a very large rain occurred which flooded the surface, allowing the visual observation of numerous additional macroseeps, which could be located from their bubble trains. Over 140 stakes were placed in the southern portion of the Product 700 pit in an attempt to mark all of the individual bubble trains before the staking crew ran out of stakes. The largest magnitude natural macroseep (Figure 8, 9 and 10) found by this method within the Product 700 pit was gauged to vent about 9 liters/minute of free gas. Observation well FW-09 was installed at this location by digging a 24-inch 10-foot deep hole, which was cased with 24-inch PVC pipe and used as an additional flux observation station. Two free gas samples were collected from this well on January 24, 2000 and sent to Isotech Labs for chemical and isotopic analysis (see Table 5). In sharp contrast to the two trench samples, these free gas samples were found to contain nearly 100% methane, 97.68% and 97.66%. The carbon dioxide levels are 0.72% and 0.67%, respectively, providing nearly 99% of the total gas when added to the methane. Ethane and propane are 0.34% and approximately 0.0046% (3400 and 46 ppmv). Ethane isotopes are -20.08 and -20.01 parts per mil with respect to the PDB standard. Comparison with the 50-foot Ballona gravel monitor wells shows that these gases are nearly identical to the gases contained within the aquifer at depth. Clearly these samples must represent direct vertical discharge from the Ballona gravel aquifer without any additional degradation related to residence within the upper 50 feet of sediments. This certainly suggests that the trench gas samples are likely degraded very near the surface.

Numerous geoprobe Cone Penetrameter Tests (CPT boreholes) were installed by CDM working with LADBS consultant Dr. Gary Robbins in an attempt to install vent wells in the 50-foot Ballona gravel aquifer. Figures 11, 12, 13, 14 and 15 illustrate the process which is described in detail in Appendix C. The first test performed was very successful. A CPT borehole was pushed to 66 feet below surface at TV-1 near soil gas site 207. When the probe rods were pulled up to 60 feet subsurface, the well discharged about one

gallon of water and then flowed free gas at the rate of 10 liter/minute for 69 hours, until destroyed in an unsuccessful attempt to replace the CPT probe rods with a monitor well. Most of these attempts to install gas vent wells failed because the shallow silts at the top of the 50-foot gravels were too unconsolidated to remain open. The wells were clogged by unconsolidated clastic sediment and were invaded by water, which shut off the gas flow. Many unsuccessful attempts were made by CDM to solve the mechanical production problems, with 10 monitor wells installed and 122 CPT borehole attempts. Gas production was too sporadic and unpredictable to be effective. Free gas is generally present somewhere in the upper 50 feet of sediments within the areas having the largest methane soil gases. However, this free gas is not easily found, nor vented from these unconsolidated sediments. Gas could not even be successfully vented from the vicinity of some of the largest macroseep areas. For example, three of these potential vent wells were drilled within 10 feet of FW-09, on three sides, none of which were capable of venting gas from the gravel aquifer.

A backhoe accident during February knocked over the casing of flux well FW-09 and filled the hole with gravel. An attempt was made to dig out the gravel, which resulted in reducing the gas flow to about 2 liters/minute (Figure 16). As of May 16, 2000 this FW-09 observation well has continued to flow gas, unabated by the attempts to vent the gases from the 50-foot Ballona gravel aquifer (see Figure 17). This observation well, and many other tests (over 120 attempts were made to install vent wells in the gravel aquifer) have yielded similar results. These tests suggest that the gas contained within the 50-foot Ballona gravel aquifer provides a vertical pathway for the gas, but is not an intermediate source for the macroseep vents, at least not for the largest soil gas anomalies. The gravel serves as a transmission zone, but unfortunately does not appear to provide a significant intermediate reservoir that serves as a source for the four-foot deep near-surface soil gases. These observations suggest that the main gas source must lie below the Ballona gravels.

Numerous surface flux tests (Figures 18, 19, 20 and 21) were also conducted using an EPA flux chamber over portions of the methane anomaly in Tract 49104-01 by CDM (assisted by Dr. C. E. Schmidt) during the first quarter of 2001 (March 6, 2001 CDM letter report to David Nelson entitled "Methane Surface Flux Emissions for Product 700 Area, Lots 58 and 59 in Tract 49104-01"). Methane gas flux rates as high as 23,000 CFG/D were conservatively estimated to be present over a 44,000 square foot area within the Product 700 area, where the very largest magnitude seeps have been found. These observations, together with the observed elevated methane soil gas concentrations shown by Plates 2 and 2a clearly classify the largest, and most anomalous methane contours as surface methane gas macroseeps.

2.2 Soil Gas Ethane, Propane, and Butanes

The presence of detectable concentrations of methane homologs (ethane, propane, iso-butane, and normal-butane) illustrated on Plates 3, 4, 5, and 6, respectively, have similar distributions as methane, proving that a major portion of the methane is from a thermogenic origin. Distinctive compositional ratios for ethane/propane and iso-

butane/normal-butane confirm that the four foot deep soil gases are directly related to deeper gases measured in the 50-foot Ballona gravel aquifer monitor wells. An iso/normal butane ratio greater than one generally indicates an immature source (such as the Pico sands), however this ratio has also been shown to increase during oxidation of these hydrocarbons (Coleman et al. 1981, James, 1983, 1984 and 1990). Additional deeper gas source information from the abandoned wells are required to determine the controls on these ratios.

As with methane, contour intervals were chosen in order to emphasize the larger macroseeps in Plates 3 to 6. Lower values were selected for ethane and propane so that the much lower concentrations within these background areas are defined. This is required to properly illustrate the gas concentrations typical of areas A, B and C. (Plates, 3a and 4a, are contoured in ppbv). Soil gas data measured at four feet provides a very cost-effective method for finding macroseeps over such a large regional area, however, soil gas cannot be used exclusively for evaluation. As shown (ETI April 17, 2000 report), the four foot soil gas data does aid significantly in defining appropriate locations for the deeper monitor wells, however, monitor wells are also essential for proper due diligence in order to evaluate the Ballona gravels for their gas content. If no significant gas is found in either the soil gas or the monitor wells, then the area can be declared as completely safe from charging by deeper gas sources. The requirement for monitor wells is particularly important in this case because of the wide regional soil gas spacing used to survey these three areas. With this spacing anomalies can be missed, and will at best be poorly defined. When monitor wells are used with soil gas, then these two independent data sets can provide a reasonably good compromise for properly defining subsurface gas anomalies, and even for suggesting their potential migration pathways.

Anomalies from these lower contour intervals shown on Plates 2a, 3a and 4a were used to pick locations for the 50-foot deep Ballona gravel monitor wells that are recommended for due diligence in completing this regional assessment. At a minimum, five monitor well locations have been selected for area A, B and C at soil gas sites 6002, 6041, 7058, 8008 and 8022. These five sites were selected because they have low grade soil gas anomalies in methane, ethane and propane. A very important distinction is to note that the methane, ethane, and propane magnitudes, and the methane/ethane and ethane/propane ratios for these selected sites all exhibit oil-type rather than gas-type signatures, in sharp contrast with the much larger methane anomalies located east of Lincoln. These are (in ppbv):

Site	Methane	Ethane	Propane	C1/C2	C2/C3
6002	4000	570	230	7.02	2.48
6041	4100	520	230	7.89	2.26
7058	7000	2140	1700	3.27	1.26
8008	5300	400	170	13.25	2.35
8022	5400	590	270	9.15	2.19

Methane/ethane and ethane/propane ratios for the macroseeps in area 49104-01 are significantly gassier, typically ranging upwards of 250 for C1/C2 and 65 for C2/C3. Two of the largest magnitude seeps from sites 207 and 211 (both of which had blowouts during

the installation of the monitor wells) are listed below in (ppmv): Methane/ethane and ethane/propane ratios for the macroseeps in area 49104-01 are significantly gassier, typically ranging upwards of 250 for C1/C2 and 65 for C2/C3. Two of the largest magnitude seeps from sites 207 and 211 (both of which had blowouts during the installation of the monitor wells) are listed below in (ppmv):

Site	Methane	Ethane	Propane	C1/C2	C2/C3
207	798800	3234	49	247	66
211	891543	3188	43	280	74

Although magnitudes can change rapidly, the compositions of soil gas and monitor well data are much more stable, allowing the definition of groups of data having common compositions that can then be related to a specific source.

Empirical compositional classifications derived from previous soil gas surveys conducted over producing fields have been established (Jones & Drozd, 1983). Typical ratios for soil gas or produced gases for different types of hydrocarbon deposits are:

Methane/Ethane Ratio	Ethane/Propane Ratio	Composition
> 100	> 5.0	Dry Gas
20 - 100	3.5 - 5.0	Gas
10 - 20	2.5 - 3.5	Oil and Gas/Intermediate
5 - 10	2.0 - 2.5	Oil
< 5	< 2.0	Heavy Oil/Degraded

Comparison of the above low-grade soil gas anomalies with these general empirical classifications clearly shows that the low level microseeps typical of these three areas are related to oilier sources, as might be expected for soil gas data collected directly over an oil field.

If the proposed monitor wells agree with the soil gas samples and show that there is no appreciable gas contained in the gravel aquifer in the A, B and C Phase 2 areas, then there would be no need for methane mitigation for buildings constructed within these areas. However, regardless of the lack of subsurface gas sources within these areas, no building should be constructed over any of the active or abandoned gas storage wells or the gas storage field. DOGGR regulations should be followed in these areas.

2.3 Soil Gas Hydrogen Sulfide

Hydrogen sulfide in detectable concentrations (Table 3, Plate 7) in the near-surface soils are very localized in areal extent with respect to the entire Playa Vista Development. Concentrations ranged from non-detect to 41 ppmv. Anomalous areas of hydrogen sulfide, with the greatest areal extent, are generally coincident with the western methane anomaly in Tract 49104-01 described above. Only 12 samples exceed 1 ppmv in concentration, and all but one of these samples lie within area 49104-01 where the largest macroseeps occur. The second largest anomaly of 27 ppmv does occur in association with a methane level of 5.33 % at site 9349 in area 49104-04. Ethane and propane anomalies are also present in the vicinity of this site, but are not coincident with the methane and

hydrogen sulfide at this location. A tighter grid spacing of soil gas should be applied in order to better define this hydrogen sulfide anomaly, followed by installing at least one monitor well for sampling of the Ballona aquifer. Two existing monitor wells, C-23 and C-28 should also be sampled from this general area for background control.

Although hydrogen sulfide has often been observed within archeological trenches, an evaluation of the many boring logs drilled and sampled on this site have shown that hydrogen sulfide does not occur systematically in the boreholes, and almost always within natural or shallow fill, such as La Brea sediments. The main source of the hydrogen sulfide appears to be from shallow recent swamp deposits and perhaps from the fill brought to the site from the La Brea area during the Hughes operations. It is very significant to note that the observations of H₂S in the soil gas collected near the surface always occurs with significant methane anomalies. The H₂S that was observed during the blowouts from installing boreholes or monitor wells was from isolated subsurface pockets of gas that was effectively trapped in the shallow subsurface. When the borehole or monitor well opened this isolated pocket the gases discharged quickly. Long term venting from the same monitor wells that recorded blowouts did not continue to discharge additional H₂S. Apparently the H₂S was then diluted by additional gas from deeper depths, which did continue to flow.

During the installation and monitoring of the methane vent wells, CDM and ETI/LADBS consultants inspected every vent well for H₂S odors. In no cases were H₂S odors detected in any long term vent wells, in spite of the fact that significant levels of methane gas was being vented from these same wells. The most important observation made with respect to hydrogen sulfide, is that it has not been detected in near-surface soils, except in the areas of advective methane seeps. Thus, outside of high-volume methane discharge areas, no hydrogen sulfide anomalies have been found in the near-surface soil gas.

Within the current density of sampling, it appears that all of the major methane and H₂S discharge areas have been reasonably well defined. Closer-detailed sampling within the main methane anomaly areas has demonstrated that there are some very localized gas vents that can range from inches to 10's of feet in dimension, however, such vents are not usually isolated, with no other vents nearby. To improve due diligence ETI has requested that 50-foot centers be used to resurvey underneath planned building footprints before the foundation is laid. This is very important within areas having numerous advective vents, because this higher density soil gas data can aid in defining the areas requiring additional vent risers. However, in background areas this is probably not necessary. A combination of soil gas and monitor well data can determine the likelihood of finding any advective vents. If neither is anomalous, then it is reasonably safe to conclude that the assessment surveys are adequate.

Another safeguard for insuring that the current soil gas grids have effectively found most of the dangerous vents is to measure all of the biogenic gases that are generated by subsurface contamination. As described, below, carbon dioxide provides another potential safety factor for helping to define areas containing significant subsurface

contamination.

2.4 Soil Gas Carbon Dioxide

Although carbon dioxide is generated by the biodegradation of all types of organic materials and must be used with caution in soil gas investigations, the presence of a concentrated petroleum source such as gasoline, diesel, kerosene, or even methane can cause a concentrated buildup of carbon dioxide in the subsurface. The average concentration of carbon dioxide in ambient air is only 0.03 percent. Biodegradation of typical soil organic matter generally yields carbon dioxide concentrations between 0.2 to 3-5 percent. Higher concentrations of carbon dioxide measured in various soil vapor samples collected in the vicinity of subsurface petroleum contamination often yields values as high as 5 to 30 percent, an indication that biodegradation is significantly enhanced. Such an enhancement of CO₂ is almost always found within an area containing a significant contaminant plume.

Bacteria consume hydrocarbons and generate carbon dioxide under aerobic conditions and methane under anaerobic conditions. Carbon dioxide and methane generated by this process are commonly the largest magnitude components in the soil gas mixture. In general, the longer the hydrocarbon source is present in the subsurface environment, the larger are the concentrations of these biogenically produced gases. Carbon dioxide also has the advantage that it is generated near the edges of the contamination because that is where the proper mixture of oxygen and organic contamination can be found. Within the heart of the contamination, the generation of carbon dioxide can be significantly reduced because of a lack of available oxygen. Thus an area containing high methane and low CO₂ is likely at the heart of a macroseep and an area containing moderate methane with large CO₂ is probably near the edge of a contaminate plume. In contrast, areas containing neither methane nor CO₂ is a true background area. Given this relationship, it can be very useful to measure these two biogenic gases (methane and carbon dioxide) and to use their contrasting behavior to help define the location of the more significant contaminant plumes.

Carbon dioxide (CO₂) concentrations at PVD (Table 4, Plate 8) range from background levels of less than 3% to greater than 30%. These results indicate that significant aerobic degradation is occurring at specific locations on this site. The generation of CO₂ by this process is very rapid and can occur only where there is sufficient oxygen to support the consumption of the hydrocarbon contaminant source. Generally, as noted above, the areas of anomalous CO₂ occur as halos around the areas of advective methane seeps (methane anomalies) where oxidation consumes the available oxygen. Within an advective seep the hydrocarbon source may use up the available oxygen, causing the generation of CO₂ to cease. Thus areas of low CO₂ concentrations that are coincident with anomalous methane concentrations can define the seepage areas containing the most rapid rates of advection, and conversely areas where the methane and CO₂ are both anomalous may indicate more moderate vertical migration rates where the methane flux is in balance with the diffusion influx of oxygen from the air. Areas where both methane and CO₂ are near background

would confirm areas where there is no hydrocarbon seepage (i.e., true background).

The map of CO₂ values shown by Plate 8 was generated in order to use these relationships for due diligence in interpreting this regional soil gas data. In order to avoid mapping background variations the CO₂ contour values were set at 5, 7.5 and 10%. With these contour values, areas A, B and C have almost no CO₂ anomalies. Most high values, greater than 15 to 20%, particularly those that occupy more than one adjacent site, occur mainly within the main methane seepage areas in Tract 49104-01. The highest value of 32.43% occurs at site 9774 and is confirmed by low magnitude, more oily light hydrocarbons. At this site the C₂/C₃ ratio is less than one (0.95) and the C₁/C₂ ratio is nearly 10,000 (9286), suggestive of some minor oily contamination. The majority of the largest magnitude CO₂ sites (those greater than 15 to 25%) appear to occur near the edges of the main advective seeps. For example, sites 275, 267, 253, 242 and 233 coincide with the southwestern edge of the highest methane anomaly centered on Product 700. Sites 203, 267, 253, 242 and 233 define the western extent of this big methane anomaly. Sites 188 and 193 contain an anomaly that sits right in a low area (hole) on the eastern edge of the methane anomaly.

Sites 207 and 211, which lie right in the heart of the Tract 49104-01 methane anomaly are typical of the largest soil gas seeps. A comparison with the monitor well data from these same two sites shows that the concentrations at four feet are comparable to those measured at 50 feet below surface, suggesting the presence of advective flow from the sources in the Ballona gravel aquifer at depth to the surface. Bubbling seeps, as discussed above in Section 2.1 under Soil Gas Methane provide visible evidence of this active migration. Methane values near 100% (80 and 89%) and CO₂ values ranging from 0.5 to 1% (0.82 and 0.66%) for gas at these two sites support the interpretation of gas moving through the upper 50 feet of sediments without dilution or alteration.

In contrast to the very largest flux sites, there are many places where a moderate methane anomaly exists that is coincident with a CO₂ anomaly. These sites, such as, (734, 735) and (802, 803, 804, 805) and (811, 812, 813, 814), just to point out three specific cases, show locations where it is likely that the CO₂ is generated directly from the center of the methane seep (which is the food source). This would indicate that the flux of methane in these areas is slow enough to allow oxygen from the air to diffuse into the upper meter of soil and be used to generate these coincident methane/CO₂ anomalies. Examination of Plates 2 and 8 show that there are many such coincident anomalies.

No close detail sampling has been done on the eastern methane anomaly that occurs in Tract 49104-02 (Plate 2) of Phase 1. This large anomaly has a definite east-west orientation, and extends from the Phase 1, Tract 49104-02 area into area D of Phase 2. This Phase 2 area must be evaluated simultaneously with the western portion of the anomaly that lies within the Phase 1 area. Both the soil gas and the monitor wells from this anomaly exhibit a slightly oilier signature than the main 01 anomaly. This change in composition as compared to the monitor wells in area 49104-01 is very minor, much like the changes shown by the Centinela Creek macroseep bubbles. In both cases these changes are probably reflecting separate Pico reservoirs at depth. Low CO₂ with high

methane on the western portion of this anomaly suggests some advective flow, whereas the eastern portion (in area D) has large CO₂, accompanied by moderately large methane, suggesting a lower methane flux rate, with considerably more oxidation occurring near the surface.

Where both methane (and its homologs, ethane, propane and butanes) are absent and there is no CO₂, one may be fairly confident that there is no organic contamination in the soil at that location. CO₂ is always generated by shallow diagenesis because the bacterial filter is everywhere and oxygen is always present in shallow vadose zone soils and ground water near the edges of any subsurface contaminant plume. Large CO₂ magnitudes always signify the presence of shallow oxidation of an organic contaminant. The tendency for CO₂ to occur in larger concentrations near the edge of the oxidizing organic matter provides an advantage when coupled with direct detection of the organic contaminant, such as methane in this case. Adding CO₂ analyses increases the likelihood of finding the subsurface contaminant plume. Thus the CO₂ is very valuable, particularly when the soil gas grid has been undersampled as much as it has by using 300 foot centers within areas A, C and portions of area D of Phase 2. Area B is so under sampled that no assurances regarding the detection of gas anomalies can be made. However, a nearly complete lack of large CO₂ or methane anomalies within areas A and C suggests that no major contaminated areas have been missed in those portions that have been surveyed, in spite of the wide spacing used for the soil gas survey.

2.5 Soil Gas BTEX (benzene, toluene, ethylbenzene and xylenes)

Concentrations of benzene, toluene and total xylenes (Table 2) are illustrated in Plates 9 and 10, respectively. There is, effectively, no benzene present in the vadose zone soil gases. Toluene concentrations range from non-detect to 6.4 ppmv while total xylenes concentrations range from non-detect to 6.7 ppmv. Toluene and total xylenes in detectable concentrations in the near-surface soils are very localized in areal extent with respect to the entire Playa Vista Development. As with hydrogen sulfide, anomalous areas of toluene and total xylenes, with the greatest areal extent, are generally coincident with methane anomalies in Tract 01 and Tract 02 described above. Toluene and total xylenes are generally not detected in near-surface soils except in the areas of advective methane seeps. The probable source of the toluene and total xylenes is from volatilization of the fill brought to the site from the La Brea area during the Hughes operations. The anomalous areas of toluene and total xylenes coincide with areas in which zones of the La Brea fill were described in borings. Water samples from the 50-foot gravel aquifer (MW 1 through MW 5) were collected by CDM from the monitor wells in Tract 03 and analyzed for BTEX. As shown by Table 6, the BTEX levels were below detection limits. Toluene and total xylenes are not detected at the surface, however, except in areas of advective methane flow.

It is interesting to note that the largest toluene and xylene anomalies appear to be associated with the eastern methane anomaly (sites 921 to 914) and with the more central methane anomalies (sites centered near 735, 813 and 803). These groups of methane anomalies are the oiliest (they have the largest ethanes, propanes and butanes). Additional

sampling and testing of the existing monitor wells needs to be done, plus the installation of several additional new monitor wells. Proposed locations for the new wells are at soil gas sites 970, 9006, 9726, 9845, 9848, 9830, 9787, 9050 and 9739.

Formal requests for the installation, sampling and analysis of these additional monitor wells was made to Playa Vista through LADBS on January 24, 2000 when these regional maps were formally presented during a joint technical meeting of the Playa Vista and ETI/LADBS consultants. Final interpretation of this soil gas data and this new monitor well data needs to be completed and this report rewritten whenever data from these new, additional monitor wells is available. Due diligence on this regional assessment report will not be done until this final task is completed.

2.6 Centinela Creek Bubbling Seep Isotope Results

Gas seeps containing ethane collected and analyzed in 1993 from the general area of the confluence of the Ballona and Centinela Creeks (Global Geochemistry, 1994, ETI, June 18, 1999 1st Progress Report). This data established the presence of advective flow macroseeps, which contained some ethane. These seeps have methane isotopic values that are very similar to those found and reported in the surface soil gases, and 50-foot Ballona gravel monitor wells by ETI in the April 17, 2000 report. A second reconnaissance along Centinela Creek, conducted on October 20, 2000 by Paul Witherspoon and Walt Merschat from SGS identified several bubbling seeps. These were noted and are mapped on Plate 1.

Three, free gas macroseeps were sampled from Centinela Creek at the area where the Global seeps were reported to have been collected. These three samples, denoted as A, B and C are plotted on Plate 12 along with the original Global macroseep samples and with the Ballona gravel monitor well data. Nine samples from the Southern California gas storage field (CDM, Sept. 5, 2000) and two gas samples from the El Segundo nonassociated, dry gas field are also plotted on Plate 12 for comparison with the Centinela Creek and Ballona gravel well samples. The two sets of Centinela Creek samples are similar. This Centinela Creek data establishes the compositional stability of this set of macroseeps and also confirms the presence of a significant pressure drive and volume required to keep these seeps active over at least seven years. The slightly different isotopic compositions of these samples from the Ballona gravel monitor wells supports the interpretation of deep "Pico" sources, which would be similar to one another, but would differ slightly from sand to sand because of source and migration dependent variations within the various Pico reservoirs.

The presence of these seeps also extends the area of known thermogenic seepage north, from the regional area surveyed to at least the confluence between Centinela and Ballona Creeks.

2.7 Riparian Wetlands Corridor Bubbling Seep Isotope Results

Another specific area of intense seepage has been found within the Riparian wetlands

corridor just south of soil gas site 817 near Teal Street (Figure 22, 23). A free gas sample was collected by volume displacement directly from one of these bubbling macroseeps on March 16, 2001 and sent to Isotech Labs for analysis. This data is listed in Table 5 and plotted on Plate 11. The methane concentration was 94.93%, the CO₂ was 1.90%, typical of the CO₂ values measured in the Ballona gravel aquifer in monitor wells 803 and 813, which were 1.97 and 1.54%. The ethane and propane were 3800 and 130 ppmv. The methane isotope of -56.91 parts per thousand fits right in with the main group of monitor wells from this area. Monitor well 803 and 813 are more than 200 feet away from the important group of seeps. Interpretation of the gravel aquifer gases suggests that the gap between the eastern and western methane anomalies in this area was caused by under-sampling related to the fact that access to this area was restricted. A new monitor well should be installed at this location to check for ventable gas and to allow proper interpretation of both the soil gas and the associated Ballona gravel aquifer anomaly.

Visual observations made on March 16, 2000 along this wetland corridor also reveal several macroseep areas that have never been sampled. In fact, as noted above, this wetland area was not sampled during the earlier Phase 1 soil gas surveys because the area was off-limits for surface access. Additional survey data must be gathered throughout this wetland corridor in order to properly complete this regional assessment. There is no question that this under-sampled wetland corridor does contain significant subsurface methane potential, which has not been properly assessed.

Gases from these bubbling macroseeps have nearly the same composition as the soil gases and the gases from the Ballona gravel monitor wells. This strong similarity suggests a common origin for these thermogenic gases. The presence of bubbling macroseeps associated with the largest soil gas and monitor well anomalies also confirms the presence of advective, pressure driven gas seepage over both land and water covered areas. The chemical and isotopic compositions of these gases collected from soil, bubbling macroseeps, and gas-charged aquifers clearly belong to a family of dry nonassociated gases, which are not connected to the deep Playa del Rey oil field, or to the Southern California Gas Storage Field. Direct comparison with the nonassociated dry gas produced from the Pico Formation on strike to the south from the El Segundo Oil field strongly suggests that these gases have probably been derived from similar deep sources, such as the Pico sands at depth. The seepage gases would have migrated from these Pico reservoirs that lie beneath the Playa Vista site. Gas shows from the driller's logs from the abandoned exploration wells suggests that these gases likely originate from between 500 to 3000 feet below surface.

2.8 Infill Detail Soil Gas in Tract 49104-01

As noted above in section 2.1 under Soil Gas Methane, the attempts to find and vent gas pockets within the top of the Ballona gravels was not successful. The observations regarding the numerous advective gas seeps demonstrated the very high spatial variability of the gas vents. In order to improve the placement of vent and monitor wells additional infill soil gas samples were collected within the main seepage area located in area 49104-

01. Data collection used ETI's four foot soil gas probe, and followed the same procedure as the regional data. However, in order to expedite turnaround and decision making most of the data was analyzed in the field using a MTI field-portable gas chromatograph. This instrument has the ability to detect only methane, ethane and carbon dioxide, with detection limits of 10 ppmv for methane and ethane and 0.01% for CO₂. This data was used for better defining the local variation of gas seepage anomalies within the 01 area, where the largest macroseeps exist. All data within the calibration range of this instrument (i.e. 10 PPMV to 100%) are of the same quality as the laboratory data. However, below the detection limit of 10 PPMV the field-screening data is bottom truncated. A few of these samples were analyzed in a laboratory GC with lower-level detection limits to verify the quality of this data. None of these samples were field screened for H₂S.

Contour maps for these three components are very similar to the regional maps, with two very important distinctions, one is that higher density sampling always reduces the areal size of the contoured anomalies because soil gas macro-vents are usually very limited in size. The second major distinction is the fact that this smaller estimate in the size of soil gas anomalies is usually accompanied by the presence of more individual (smaller sized) anomalies, resulting in increasing spatial variance. This is a very important concept because soil gas anomalies don't have to occupy a large aerial extent in order to provide a significant gas source under a building.

The best method for measuring the actual flux into the atmosphere would be to construct a large flux chamber that would cover the entire area of interest. This, of course is not practical, although the foundations of the buildings will become large flux chambers. The best alternative is to recognize that the earth also serves as a large flux chamber. When advective flow exists (driven by pressure), gas migrates toward the surface, enters the vadose zone and fills the permeable pathways with gas. A breakthrough into the atmosphere provides a pressure relief that acts to reduce lateral flow. Finding these breakthrough points is nearly impossible using EPA flux chambers because of the very small size of both the seeps and the chambers. The soil gas, on the other hand, offers a practical approach for finding these natural flux sites. This is because a natural equilibrium will be formed in which the gas flux from depth and the gas flux into the atmosphere must eventually balance. During this process a soil gas anomaly will form, taking its shape from the permeability of the adjacent sediments. Thus the sediments act as a choke, allowing leakage whenever the pressure is large enough, but also providing a near-surface reservoir in the soil pore space that will always retain some of the migrating gas. When in balance with the atmosphere, the soil gas will have a concentration that must be the same as the gas that leaked into the atmosphere at the exit point of the seep. If the pressure is reduced below atmospheric then the soil gas can, and will become diluted with air if the earth gases are not recharged from depth. Thus sites having large atmospheric flux have to be associated with soil gas sites which also have large, essentially equivalent concentrations at the exit point of the seep into the atmosphere. Lateral migration, both by advection and diffusion, will always occur within the near vicinity of the vertical pathway, building a soil gas anomaly. This lateral gas migration creates a soil gas anomaly with a stable "flux footprint" and concentration which can be

contoured in order to vector the direction from background toward the largest soil gas concentrations where the "flux pipes" must be located. By definition, then, these large magnitude soil gas sites must be the sources that control any advective seepage.

The application of a limited number of EPA flux chamber measurements without any guidance from the soil gas is a serious concern. Data from such a survey would have no value for predicting dangerous building sites, but could be misconstrued if used inadequately and incorrectly. The regional survey was conducted using 100 foot centers, which works very well for defining the main areas of concern. This spacing is, however, inadequate for placement of flux chambers. The reduction to 50 foot centers, with occasional infill, appears to provide a much better estimate of the actual size and shape of the individual soil gas anomalies, or "flux footprints". The success of this approach for locating "flux pipes" is demonstrated by the following two examples where an infill grid of 50 feet, coupled with a few additional offsets directed by the soil gas results has established the presence of two new active flux areas.

One significant new "flux pipe" was found in the Product 600 area. An expanded detail, contour map for methane is shown in Figure 24, where methane concentrations greater than 80% were found approximately 10 feet apart. Sites 9943A and 9943B had measured concentrations of 80.8 and 82.4%. In contrast, the largest values surrounding these two big macroseep sites have concentrations, which are generally less than 2000 ppmv (0.2%), and just 10 feet to the east of this large anomaly lies site 153, where only 80.9 ppmv (0.0081%) was measured. During the placement of an infill grid, site 9943 was placed halfway between sites 153 (80.9 ppmv) and 154 (612.5 ppmv). The value of 2040 ppmv measured at site 9943 was larger than either of the two original sites, but clearly did not find the macroseep in this area; however, previous observations by Walter Merschat (ETI's field party chief) had noted free gas bubbling up to the surface in this general area. The extra infill sample (9943A) added halfway between sites 9943 and site 153 found a concentration of 807,870 ppmv, confirming the existence of a large magnitude soil gas anomaly, or "flux footprint" in this area.

A second offset sample at site 9943B provided additional confirmation, and indicated that the soil gas anomaly associated with this macroseep occupies an area at least 10 feet in width. Sites 9943C and 9943D were added to further define the northern and western edges. When placed into the regional map (as shown by Figure 24 and Plate 13) it is evident that additional samples should have been placed to the northeast, toward sites 9952C and 9940. A potential northeast - southwest alignment is suggested by this soil gas data.

The presence of two large magnitude soil gas anomalies located only 10 feet apart, when taken in context with the other anomalous samples shown on Plate 13 indicates a very high potential for significant seepage under this Product 600 construction area. It is important to note that these sites would probably never have been collected close enough for this confirmation without the visual observation of bubbles that had been noted earlier (Walt Merschat, personal communication). Of even more significance, however, is the fact that this "flux footprint" confirms the presence of adequate conditions for vertical

migration directly from the underlying gravel aquifer, also confirming the existence of the previously observed "flux pipe". This large macroseep also confirms that the gravel aquifer is a potential source, and must be given serious consideration when evaluating any building sites that are located above the gas-charged portions of the aquifer.

Another excellent example of a very well-defined macroseep was found by adding a grid of samples near MMW-04. This monitor well had blown out for over an hour when it was first drilled and had also contained very anomalous free and dissolved gas concentrations in the water samples initially collected (ETI April 17, 2000 report). As shown by Plate 11 in the ETI April 17, 2000 report, contouring the data from the monitor wells appeared to define a possible area where deep gas might be entering the gravel aquifer from below. It was puzzling then that the initial soil gas contour maps (see Plate 2) did not show a large soil gas anomaly vertically over this very anomalous area of the gravel aquifer, as the data from this well would suggest. Only site 201 had noted the possible presence of an anomaly in this general area. In order to evaluate the potential for this gravel aquifer anomaly to be a gas source, an infill grid was placed between site 201 and monitor well MMW-04. Initially sites 004A through 004I were collected within the boundaries defined by sites 180, 181, 200 and 201, and only sites 004C and 004F showed appreciable values of 75.7% and 98.6%. Based on these initial infill results the remaining grid sites were added, up to 004Z.

In order to properly display this anomaly, an expanded view of this infill grid using a scale of 20 feet to the inch has been included in Figures 25, 26 and 27 for the methane, ethane and carbon dioxide. This infill grid provides one of the most important and well defined anomalies mapped by these soil gas surveys. Sites 004P, 004K and 004Z found very large concentrations of 75.8%, 97.8% and 100%, respectively, the largest soil gas concentrations measured anywhere on the site. The importance of these sites cannot be overemphasized. These anomalies showed that there is vertical seepage very close to MMW-04. Previous discussion and interpretations had suggested that the offset to the east of the very largest soil gas anomalies (shown by Plates 2 and 11 from the ETI April 17, 2000 report) might represent lateral migration from the gravel aquifer (near MMW-04), eastward towards sites soil gas 207 and possibly even to site 211. This anomaly shows that vertical migration does occur at this location (site 004Z), and also at site 9943A and B (discussed above). Both of these new macroseep areas defined by close-detail sampling have demonstrated that vertical soil gas anomalies are associated with the free and dissolved gas anomalies in the gravel aquifer, which had been previously defined by the monitor wells (such as, MMW-04 and MMW-153, which directly underlie these two macroseeps).

This 004Z anomaly was also found in an area that was too high in relative elevation to flood, significantly reducing the chances of visually seeing bubbling macroseeps in this area. Once defined by the soil gases, further examination of the area around this site did, however, result in the location of several very small macroseeps located between 004Z and 004Q, near the eastern edge of the anomaly where surface conditions allowed visual observation of the gas bubbles (Figures 28, 29). These small macroseeps were photographed and viewed over several days when conditions were just wet enough to

allow favorable detection.

Although, no visible seepage could be observed at site 004F, a small 4 foot by 4 foot plastic tent was placed over this site and sealed on it's edges by burial in the soil (see Figure 30). The soil conditions appeared to be too damp and tight to allow free gas bubbles to appear at the surface at site 004F, however this site did have a soil gas concentration of 98.6% methane at four feet below surface. Ambient air samples were taken under the tent over the next two days in order to establish whether or not there was any positive flux at this site. Within 24 hours the tent had ballooned up, and a concentration of 4.73% methane had developed under the tent (see Figure 31). Thus even though the venting was not visible, these measurements indicated that it was occurring and would have been overlooked if the detection of visible bubbles was the only method of detection used to find the "flux pipes".

This macroseep anomaly has also provided an opportunity to illustrate the range of concentrations within the anomaly and the enormous contrast between the anomaly and the adjacent background samples. The very largest methane magnitudes within the anomaly were contoured using intervals ranging from 90% (red) to 70% (yellow). The transition to background is shown using intervals from 10% (green) to only 1% (blue). General observations made over the site where other macroseeps had been noted had suggested that whenever soil gas concentrations exceeded the 1 to 25% range (10,000 to 250,000 ppmv) that visible macroseeps were likely to be found. Ethane also shows just how rapidly the magnitudes change at the edges of the macroseep area (see Figure 26).

Subsequent testing for ventable gas from the underlying gravel aquifer was unsuccessful at this site. Five TVW CPT vent boreholes were attempted at this location, three found no gas (TVW-35, TVW-75 and TVW-94), and two found only a small amount. TVW-93 was tested all the way from the top of gravel at 54.5 feet bgs (below ground surface) to the surface and found a minor gas pocket at 24.2 feet bgs. TVW-104 never found a point of refusal and was pushed to 82 feet bgs. As shown in Table 9, trace gas was recorded as present from 62 to 82 feet bgs. Clearly there is no gas pocket in the 50-foot deep gravel aquifer at this location, yet gas is venting at the surface. Five test wells, sampled from the gravel to the surface for free gas pockets within this soil gas anomaly provides conclusive evidence that deeper gas is venting straight through the Ballona gravels, and through the upper 50 feet of sedimentary cover at this location.

These two examples demonstrated that, while the presence of free gas bubbles could help in finding macroseeps, there could be no assurance that this method would be sufficient for insuring that all of the macroseep areas had been found and mapped. Tight clayey soils could also be the source of advective gas vents that were essentially invisible to this useful, but crude method of detection. Thus while mapping the presence of bubbles is conclusive evidence of advective flow, a lack of bubbles cannot be used to assume that advective flow is not occurring. Soil gas and monitor well data is essential for mapping the "flux footprints". Due diligence cannot be achieved by any other approach.

As noted earlier, numerous surface flux tests were conducted using an EPA flux chamber

over portions of the methane anomaly in Tract 49104-01 by CDM during the first quarter of 2001 (March 6, 2001 CDM letter report to David Nelson entitled "Methane Surface Flux Emissions for Product 700 Area, Lots 58 and 59 in Tract 49104-01"). Plate 16 shows the EPA chamber locations and the calculated flux values posted on top of the infill detailed methane map (Plate 13). A derivation of the flux equation and the flux data is given in Appendix D. The calculated flux values, which range from 0.000182 to 2.367 are in cubic feet of gas per square foot per day. As expected, the higher flux values do correlate regionally with the underlying soil gas data. For example, the larger values of 2 cubic feet/square foot/day occur over macroseeps (see Figure 20) located in the Product 700 area where the largest and most extensive soil gas anomalies also occur, and only background flux values occur over areas where the soil gas is uniformly low. However, because the flux chamber covers such a restricted surface area, it is possible for a single flux chamber measurement to fail at finding an advective seep, where the surface exit point may be very restrictive in size and is not marked by visible bubbles. Soil gas has the capability to approximately locate a gas venting site without actually sampling right in the vent hole. A flux chamber, on the other hand, has to exactly locate the vent hole in order to make an accurate flux measurement associated with an advective seep.

These examples demonstrates the ability of soil gas sampling to approximately locate areas which must be searched for active vents before accurate and real flux measurements can be made. The flux chamber was designed to measure diffusive flux and does not accurately measure, nor easily locate advective flux sites. In order to achieve useable flux results without having a very large number of individual flux stations, it is imperative that the flux chamber measurements be guided by a soil gas survey to vector in the potential location for the flux measurements.

2.9 Ballona Gravel Structural Maps

As noted above, the point of refusal, or so-called depth to the "Top of Gravel" was recorded during the many attempts to find subsurface gas pockets using the CPT method. Detailed testing procedures are given in Appendix C, and information on specific TVW boreholes are listed in Table 9. Over 120 CPT boreholes were pushed to refusal in the Ballona gravels using a Cone truck by CDM and 53 additional attempts were made by ECI. It was hoped that the finer sediments capping the 50-foot gravels would provide a seal, allowing free gas pockets to accumulate just below this interface. Both hand contoured and computer contoured maps were generated from this data in order to determine the potential correlations with the soil gas anomalies and any ventable gas pockets defined by these extensive CPT push-probe projects.

An initial set of field work maps were generated by Walter Merschhat during several work sessions that were held at Playa Vista during January/February 2001 between the Playa Vista Consultants and the LADBS/ETI Consultants. These maps have been reproduced as scanned pdf files and have not been digitized (Walter Merschhat "Top of Gravel" work products, February 2001). CDM provided a color scheme for their CPT borehole venting attempts, with blue used for TVW wells that would vent gas and green for wells that did

not vent any gas. As shown, by Figure 33, most of the TVW wells were not capable of venting gas. Only two main areas were responsible for most of the vented gas. Wells TVW-23 (Figure 32) and TVW-24 are the principal CPT holes that define these two main areas. An examination of the depth to the "top of gravel" shows that the areas where wells could be vented occurred mainly within an intermediate depth, which was not at the top of the gravel. Merschat's maps were generated with some slight geological/ geochemical bias related to the strong east-west lineations expressed by the geochemical soil gas maps.

A second attempt to correlate this data was made by Dr. David Becker, who prepared a set of computer-generated maps for this report. Three maps were generated, one with the ECI data, one with the CDM data and a third using both data sets. The CPT trucks used by these two separate efforts were slightly different in that the ECI data used an instrumented cone capable of creating an electric log of the sediment type as the probe was pushed and the CDM probe did not use the instrumented probe. Without the instrumented cone, the CDM probe could be pushed slightly deeper before refusal, so there is some bias between the two data sets. Plates 17, 18 and 19 are the CDM, ECI and ECI/CDM data sets, respectively. All of these very important data sets have been produced so that the reader of this report can view the available information. In the opinion of the authors, there is no correlation between the "top of gravel" and the locations of ventable gas.

3.0 SUMMARY AND CONCLUSIONS

A regional soil gas survey, consisting of 1621 sites sampled at four-foot depths, was constructed by compiling data from all of the previous three soil gas surveys that were conducted from October 1999 to January 2001. As shown by Plate 1, this includes both the Phase 1 and Phase 2 areas of the planned 1087 acre Playa Vista Development in Los Angeles, California. The purpose of the soil gas survey is to provide baseline data that reveals the areal distribution and concentration of methane gas in the near subsurface directly underlying the areas of planned construction. The survey also reveals the presence of methane homologs (ethane, propane, or butanes) derived from deep thermogenic source(s). Concern about the possible presence of toxic gases prompted additional analyses to determine the concentrations of BTEX and H₂S in the soil gases.

Methane concentrations over the survey area are highly variable and range from background (<2 ppmv) to over 900,000 ppmv (90%). Anomalous methane concentrations (greater than 12,500 ppmv) are clustered within two main areas that were identified during a previous survey conducted in 1999 and reported in the ETI April 17, 2000 report. The most significant area of anomalous methane concentrations is more than 900 feet long and occurs in the western part of Tract 49104-01. The second highest methane anomaly, more than 1000 feet long, occurs in the southern part of Tract 49104-02. Based on the regional soil gas data, the total area of anomalous methane concentrations (greater than 12,500 ppmv) underlies only about 1.5% of the 1087 acre Playa Vista site. Other methane anomalies, of smaller areal extent, occur both between and north of the two largest methane anomaly areas. The anomalous methane seeps also appear to define elongate linear anomalies that trend N 65 E, N 7 W, and N 62 W, suggesting subsurface

structural or fracture control. Ethane, propane and butanes occur within each of the major methane anomalies, establishing the presence of a thermogenic source.

During rainy periods, or within wet areas, bubbling macroseeps have been observed within most of the areas containing the largest methane soil gas concentrations. Seepage also occurs east of Lincoln within the riparian wetlands corridor that runs east-west just north of the bluffs. Visual observations along this wetland corridor have revealed the presence of several macroseeps that were not sampled by the soil gas survey because of restricted access. One bubbling macroseep collected from this area was found to have nearly the same compositions as the soil gases and the dissolved gases in the 50-foot gravel monitor wells, indicating a common origin for these thermogenic gases. This macroseep fills a gap in the soil gas data, and strongly suggests the need for collecting additional geochemical data within this wetland corridor in order to properly complete the assessment of seepage throughout the planned development site.

Bubbling macroseeps near soil gas and monitor well anomalies indicates advective, pressure driven methane seepage. Chemical and isotopic compositions of soil gas, bubbling macroseeps, and gas-charged aquifers clearly define a family of dry nonassociated gases that are definitely not connected to the deeper Playa del Rey oil field, or to the Southern California Gas Storage Field. Comparison of Playa Vista site gas compositions, with the nonassociated dry gases produced from the Pico Formation in the El Segundo Gas Field, on strike southeast of Playa Vista, shows strong similarity. It is probable that the Playa Vista gas is also derived from the Pico Formation.

Free gas collected from macroseeps in Centinela Creek extends the area of thermogenic gas seepage north from the surveyed area to at least the confluence between Centinela and Ballona Creeks. Samples collected more than seven years earlier from this same area show strong similarity to those collected recently. The fact that these same seeps are still active demonstrates the long-term stability of the advective methane gas flow in this area. It is also significant that these Centinela Creek seeps are very similar, but slightly different from the main seepage area located within 49104-01. Small localized, but systematic changes in the chemical and isotopic compositions of close-spaced, but different Pico reservoirs at depth would be created by the source and/or migration factors that control the trapping and formation of specific gas reservoirs. Biogenic changes would generally be more random and less stable. Such systematic and stable changes, strongly supports the interpretation that the source of the seeps are close, but distinctly different traps formed in the Pico sands at depth.

This soil gas data shows that no large areas of methane leakage have been found within areas A and B, which are located over and adjacent to the Southern California Gas Storage Field. Closer spaced infill detail samples placed within the areas containing the gas storage wells also did not find any large magnitude soil gas anomalies. In addition, the chemical and isotopic compositions of the soil gases in these two areas have an oilier composition than either the soil gases or the deeper gases from the 50-foot gravel aquifer mapped east of Lincoln. These latter gases are similar to the known Pico production gases, and are very different from the original oil field gases, or from the gases currently

stored within the gas storage field. A direct comparison of the storage gas samples (nine new samples were provided for this comparison) with those from the soil gases and monitor well gases on the Playa Vista site demonstrate that the gas storage field is not the source of any of the gas seepage reported on the Playa Vista Development site.

Area C was also found to be devoid of large methane anomalies, and contains only background level soil gas concentrations. This area contains two abandoned wells (Del Rey #1 and #2) that must be properly reabandoned. Provided that no significant gas is found in the 50-foot gravel aquifer within any these three areas, and the Del Rey wells are properly reabandoned, then there should be no objection to development of all three of these areas. No construction is recommended directly over the gas storage field, and if the dissolved methane concentrations are low enough in the 50-foot gravel aquifer within these three areas, then it may be worthwhile to consider waiving the installation of methane mitigation and monitoring systems for all the portions of these three areas that are far removed from any existing wells.

The areal distribution of the toxic gases, hydrogen sulfide and BTEX, have been shown to be restricted to areas where advective methane seepage occurs. The sources for these gases appears to be from shallow, organic rich soils, which may have been supplemented by La Brea fill brought in by Howard Hughes operations during early construction activities on the site. The mechanism for these gases to migrate to the surface appears to be aided by the advective methane seepage. Even with methane as a carrier gas, the levels are low, and should be readily diluted to below concentrations of concern by the methane mitigation systems required within the areas of advective gas flow. These toxic gases do not appear to migrate to the surface without a methane gas carrier and do not require consideration outside the areas of high methane seepages.

Some portions of the Playa Vista site should be considered as a high potential methane zone due to the documented areas of high-volume surface macroseeps of methane gas. These results provide the basis (methane concentrations) for establishing a matrix table (designed by a methane engineer) with three levels of methane mitigation for prevention, detection, and monitoring of methane gas. These methane system requirements are to be implemented in areas of planned construction at Playa Vista. Results from this subsurface geochemical assessment may contribute important guidelines for improving the Los Angeles Methane Gas Code.

The presence of significant gas seepage requires building methane mitigation systems for any building constructed directly over the areas where anomalous concentrations of soil gas have been measured. In the interest of safety, no variances in these methane mitigation requirements should be allowed. These mitigation systems require extensive field-testing to determine their effectiveness in handling the gases venting naturally at Playa Vista before initial occupancy. The effectiveness of these mitigation systems must be periodically reevaluated in view of future seismic activity in the Los Angeles Basin. It should be noted that a small earthquake (magnitude 3.3) did occur on September 16, 2001 on the north edge of the site, on-strike with the Charnock Fault (Preliminary Earthquake Report). A larger magnitude earthquake at this location could easily cause the gas flux on

the site to increase significantly.

The installation of real-time monitoring systems installed in the vent risers in the Playa Vista buildings could provide significant protection, provided that they are properly calibrated and demonstrated to be responding to the actual gas levels, which accumulate under the buildings foundations. This testing has not been done, and must be completed as part of the due diligence before occupancy

4.0 RECOMMENDATIONS

- 1) As with the April 17, 2000 report, this additional regional soil gas data set collected within areas A, B and C in the Phase 2 area should be supplemented and confirmed by collection and analysis of the associated dissolved gases contained in the Ballona gravel aquifer. Using the soil gas anomalies as a guide, a minimum of 18 additional monitor well locations have been selected to supplement the original 42 already installed. Installation of these wells should follow the same procedures used in the ETI April 17, 2000 report, with both free gases and dissolved gases collected and analyzed as described in Appendix B of the ETI April 17, 2000 report. All monitor wells (both the original 41 and the 18 proposed new wells) should be sampled at one time in order to generate a uniform aquifer data base for evaluation of the free and dissolved gas content in the Ballona gravel aquifer.
- 2) As agreed to by Playa Vista and LADBS, 100 foot grid spacing soil gas surveys shall be conducted over all Phase 1 or Phase 2 sites before construction may proceed.
- 3) If soil gas concentrations exceed 12,500 ppmv, then an additional soil gas survey shall be conducted over the planned building foundation using no less than 50 foot centers. Flux chamber measurements should not be used without adequate guidance by gridded soil gas surveys.
- 4) Buildings should not be constructed over the Playa del Rey Gas Storage Facility in Areas A and B. For maximum safety the areas directly over the gas storage field should be reconfigured as open space.
- 5) The Del Rey 1 and Del Rey 2 abandoned wells in Area C should be reabandoned to current DOGGR standards if this area is to be developed.
- 6) Based upon the results of the regional soil gas survey under current grid spacing, and favorable results from the additional proposed wells discussed in (1) above, it does not appear that methane concentrations are high enough to warrant methane mitigation and monitoring for planned construction in Areas A, B, and C of Phase 2 provided that the above recommendations are adhered to.
- 7) The methane mitigation systems proposed for these buildings must be thoroughly tested to insure that their performance meets the specifications. Gas samples must be collected from the sampling ports located both above and below the membrane and analyzed in a laboratory for their methane through butane contents. Simultaneous sample collection must be performed in the vent risers in order to determine how closely the vent monitoring system meets the requirements of monitoring the gas concentrations under the slab and in reducing the methane gas concentrations below the membrane to below 3.75%. If these testing and reporting procedures are not followed, then a hazardous

condition could result.

5.0 REFERENCES

Anderson, T. H., Becker, D. F., and Witherspoon, P. A., 2001, Assessment of Geological and Geophysical Characteristics of the Playa Vista Development Site and Integration with Geochemical Observations, July 2, prepared for LADBS.

Barton, C.L., 1931, A Report on the Playa Del Rey Oil Field, in Summary of Operations, California Oil Fields, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 17, n. 2, p. 5-15.

Biddle, K.T., 1991, The Los Angeles Basin: An Overview, in Active Margins Basins; ed., Kevin T. Biddle, AAPG Memoir 52, p. 5-24.

Camp Dresser & McKee, April 30, 1999, Safety/Risk of Upset Technical Report for Playa Vista - Second Phase Project, 108 p.

Camp Dresser & McKee, October 12, 1999, Preliminary Area D Soil Gas Lab Results faxed to Playa Vista Distribution - from Tony Skidmore.

Camp Dresser & McKee, September 5, 2000, Sampling and Analysis of Gas from the Southern California Gas Company Playa del Rey Gas Storage Field, 5 p., tables, figures, plates.

Camp Dresser & McKee, March 6, 2001 letter report to David Nelson entitled "Methane Surface Flux Emissions for Product 700 Area, Lots 58 and 59 in Tract 49104-01"

Coleman, D.D., Meents, W.F., Liu, C. and Keogh, R.A., 1977. Isotopic Identification of Leakage Gas from Underground Storage Reservoirs, Illinois State Geol. Survey, Illinois

Petroleum, 111.

Coleman, D.D., 1979. The Origin of Drift-gas Deposits as Determined by Radiocarbon Dating of Methane. In: R. Berger and H.E. Seuss (Editors), Radiocarbon Dating, Proceedings of the Ninth International Radiocarbon Dating Conference, 1976. University of California Press, Berkeley, pp. 365-387.

Coleman, D.D., J.B. Risatti, and M. Schoell (1981), "Fractionation of Carbon and Hydrogen Isotopes by Methane-oxidizing Bacteria." *Geochimica et Cosmochimica Acta*, v. 45, p. 1033-1037.

Coleman, D.D., C.L. Liu, and K.M. Riley (1988) "Microbial Methane in the Glacial Deposits and Shallow Paleozoic Rocks of Illinois." In: *Origins of Methane in the Earth*, M. Schoell (Editor), *Chemical Geology*, v. 71, p. 23-40.

Coleman, D.D., 2000, Private communication, isotopic analyses of two gas samples from Pico gas sands at El Segundo Field, Los Angeles, CA.

Cordova, Simon, 1963, El Segundo Oil Field, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 49, n. 2, p. 45-52, plates, tables.

Davis and Namson, November 1999, Playa del Rey Field Open File Report, 1 Location Map, 3 Structure Contour Maps, 3 Cross Sections, No Text, Prepared for Playa Capital.

Davis and Namson, November 16, 2000, An Evaluation of the Subsurface Structure of the Playa Vista Project Site and Adjacent Area, Los Angeles, California, 56 p., figures, plates.

ENSR Consulting and Engineering, October 1997, Data Review and Limited Phase 2 Subsurface Site Assessment at Playa Vista Property, 64 p.

Exploration Technologies, Inc., November 29, 1999, Preliminary Comments Regarding Methane Gas Concerns for the Playa Vista Project Tract 49104-03 and Conditions to be Met for Issuance of a Building Permit, 4 p., 3 plates, appendices.

Exploration Technologies, Inc., April 17, 2000, Subsurface Geochemical Assessment of Methane Gas Occurrences, Playa Vista Development, First Phase Project, Los Angeles, California, 29 p., 7 figures, 6 tables, 12 plates, appendices.

Exploration Technologies, Inc., March 14, 2001, Concentration Of C1-C4 Gaseous Hydrocarbons, BTEX Aromatic Hydrocarbons, Carbon Dioxide And Hydrogen Sulfide In Soil Gas At Tract-03 Beneath Fountain Park Apartments Following Installation Of Concrete Pilings.

Global Geochemistry Corp., January 20, 1994, Comparison of Chemical Properties of Gases Collected in Bubbles Emerging from Centinela and Ballona Creeks, Marina del

Rey, California, 4 p., tables, graph.

Group Delta Consultants, Inc. February 5, 1999, Geotechnical Recommendations Increment 1, Area De, Playa Vista Development, 13255 Jefferson Boulevard, Los Angeles, CA, 24 p.

Hodges, F.C., 1944, Gas Storage and Recent Developments in the Playa Del Rey Oil Field, in Summary of Operations, California Oil Fields, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 30, n. 2, p. 3-10.

Integrated Environmental Services, Inc., May 28, 1999, Responses to Methane Gas Concerns - Playa Vista 61 p.

James, A.T., 1983, Correlation of natural gas by use of carbon isotopic distribution between hydrocarbon components. AAPG Bulletin, 67-1176-1191.

James, A.T., 1990, Correlation of reservoired gases using the carbon isotopic composition of wet gas component. AAPG Bulletin, 74-1441-1448.

James, A.T., and B.J. Burns, 1984, Microbial alteration of subsurface natural gas accumulations. AAPG Bulletin, 68, 957-960.

Jones, V.T., and Drozd, R.J., 1983, Predictions of Oil and Gas Potential by Near-Surface Geochemistry: A.A.P.G., Bull., Vol. 67, No. 6, p. 932-952.

Jones, V. T. and Burtell S. G., 1996. Hydrocarbon flux variations in natural and anthropogenic seeps, in D. Schumacher & M.A. Abrams, eds., Hydrocarbon migration and its near-surface expression: AAPG Memoir 66, p. 203-221.

Jones, V.T. and Agostino, P. N., 1998, Case Studies of Anaerobic Methane Generation at a Variety of Hydrocarbon Fuel Contaminated Sites, Presented at the National Ground Water Association, 1998, Houston, Texas

Jones, V.T., Matthews, M.D., and Richers, D., 2000, Light Hydrocarbons in Petroleum and Natural Gas Exploration. Handbook of Exploration Geochemistry: Gas Geochemistry. Vol. 7., Chapter 5, Elsevier Science Publishers.

Merschatt, Walter, 2001, Top of Gravel work products, February, pdf format only.

Map 1

Map 2

Map 3

Map 4

Map 5

Map 6

Map 7

Map 8

Map 9

Map 10

Map 11

Map 12

Map 13

McLaren Environmental Engineering, May 8, 1987, Site Investigation and Evaluation of Remedial Measures Report, Howard Hughes Property Plant Site, Los Angeles, California, 398 p.

Preliminary Earthquake Report, September 16, 2001, event ID # ci09564425, reviewed by a USGS seismologist, Southern Ca. Seismic Network, Caltech Seismological Laboratory.

Riegle, J.R., 1953, Gas Storage in the Playa Del Rey Oil Field, in Summary of Operations, California Oil Fields, State of Calif. Div. Of Oil and Gas, San Francisco, Calif. V. 39, n. 2, p. 17-33.

Sepich Associates, Inc., April 2, 1999, Methane Recommendations Relating to Issuance of Mass Grading Permit at Proposed Playa Vista Project, Los Angeles, CA, 7 p.

Sepich Associates, Inc., January 30, 2001, Playa Vista Methane Prevention, Detection, and Monitoring Program, 6 p. 1 table, 1 plate.

Slossen, James E., 1971, Engineering Geology Review of the February 9, 1971 Earthquake-San Fernando - Sylmar Area, Journal of Petroleum Engineers of AIME, SPE paper number 3457.

Thompson, K.F.M., 1966. Postulated Generation of Bacterial Methane from Seepage Petroleum in Sea Floor Sediments of the Gulf of Mexico, in D. Schumacher and M.A. Abrams, eds., Hydrocarbon migration and its near surface expression: AAPG Memoir 66, pl. 331-334.

Wright, T.L., 1991, Structural Geology and Tectonic Evolution of the Los Angeles Basin, California, in Active Margins Basins; ed., Kevin T. Biddle, AAPG Memoir 52, p. 35-134

LETTER NO. 220

David C. Voss, Jr.
Voss & Associates
Marina Towers
4640 Admiralty Way, Suite 800
Marina del Rey, CA 90292-6602

Comment 220-1

It is high time that Los Angeles addresses urban sprawl. By continuing to build further and farther away from city centers, our city creates problems that are becoming increasingly difficult to solve.

Not only does it mean that everyone who lives in the Valley, for instance, and commutes to the Westside loses two hours of their lives sitting in gridlock every day, but it means that our city has to pay for more infrastructure to service the communities that are being built further and further away from existing roads, libraries, and police and fire stations.

While sprawl will always be a problem for our city, there is an opportunity to reverse the trend. approving urban developments like Playa Vista will put people where the jobs are, reducing commuting time, utilizing existing infrastructure and concentrating our population where it can be more easily serviced by public transportation and protective services.

Opponents of the project look at NIMBY [Not In My Back Yard] issues, but it is high time that we look at the big picture of where our city is headed. Projects like Playa Vista need to move forward on the Westside and in other parts of the city because they simply make sense.

Response 220-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 221

Gwen Vuchsas
SECO Investigative Services
4553 Glencoe Avenue, Suite 370
Marina del Rey, CA 90292

Comment 221-1

Playa Vista received a vote of confidence by having the Westchester Neighborhood Council endorse the next phase of development--The Village.

Playa Vista is bringing life and vitality to the Westchester area after years of neglect. Roads had not been fixed until Playa Vista came around. The area at the southwest corner of Lincoln and Jefferson, which was once a dumping ground for old tires and other trash, is now a thriving freshwater marsh thanks to Playa Vista.

The Village is being planned for the old runway area once used by Howard Hughes. If The Village is built and designed to the same standards exhibited by Playa Vista to date on the other parts of the property, this proposal should win a lop-sided vote of support from the City Council.

Response 221-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 222

Daniel Walker
7416 West 82nd Street
Los Angeles, CA 90045

Comment 222-1

We support Playa Vista phase 2 in concept but recommend that the City of Los Angeles insist on additional traffic mitigation. We are eager to visit the new Village shops, restaurants, etc., which will be conveniently close to our house on 82nd Street in Westchester. However, the proposed mitigations by Playa Vista to help reduce traffic congestion are very minimal.

We support the minor phase II improvements to Jefferson and Centinela roads near Playa Vista. We also support the proposed clean air shuttle and Rapid bus service, which Playa Vista will help pay for several years. This will be helpful to many Village workers, students, and seniors. However, how many of the upscale Playa Vista residents will take the bus, especially for trips outside Playa Vista? To get from Playa Vista to key destinations like LAX, Santa Monica, Marina Del Rey, downtown LA would require waiting for at two buses. We can do better.

Response 222-1

A detailed analysis of the Proposed Project's traffic impacts has been performed and is presented in Section IV.K.(1), Traffic and Circulation, of the Draft EIR beginning on page 798. The Traffic Study measured the performance of 218 key intersections within an approximately 100 square mile study area described in Section IV.K.(1), Traffic and Circulation, of the Draft EIR, beginning on page 828 and in Technical Appendix K-2.

The Draft EIR includes a comprehensive mitigation program to address the significant impacts identified in the analysis. In addition, a new mitigation measure has been added to the mitigation program in the Draft EIR as discussed in Section II.15 of the Final EIR on page 216 and Topical Response TR-10, Alternative 2010 Baseline Scenario – Additional Mitigation Measure, on page 472. This new mitigation measure would mitigate the one remaining significant traffic impact at Centinela Avenue and Jefferson Boulevard that was identified in the Draft EIR. With implementation of the mitigation measure, the Proposed Project would not have any significant traffic impacts. The traffic model and methodology used to evaluate the Proposed Project's impacts is also discussed in greater detail in Topical Response TR-1, Playa Vista Transportation Model, on page 445, above.

The transit enhancement mitigation measures proposed in the Draft EIR are designed for use by Playa Vista residents and employees, and to meet the existing and future demand of other transit riders in the area. In addition, the transit mitigation does not rely on a majority of Playa Vista residents or employees using transit to be effective; in fact, the mitigation would be effective to

reduce potentially significant impacts to less than significant levels with as little as 1 to 3.3 percent of the total trips along the enhanced transit corridors using the proposed system. Please refer to Topical Response TR-4, The Village at Playa Vista Transit Plan Effectiveness, on page 455 for a more detailed discussion.

Comment 222-2

Restoring the Ballona fresh water wetlands and salt water marshes for birds, animals, and people to enjoy must continue to be a priority for Playa Vista phase II.

Response 222-2

The Proposed Project would complete the final portion of the Riparian Corridor, an essential link in the Freshwater Wetland System (which includes the Freshwater Marsh and Riparian Corridor). The completion of this habitat is a priority for the Proposed Project.

In December 2003, the Applicant completed the transfer of all parcels west of Lincoln Boulevard, other than the Freshwater Marsh, to the State of California. With completion of this transaction, the future restoration of the salt marsh will be undertaken by other entities.

Comment 222-3

We strongly believe that existing conditions along Lincoln Blvd. the 405 freeway near Playa Vista are already unacceptable today before phase I has even been partially implemented. The proposed road improvements to Lincoln south of Jefferson from phase I mitigations were a step in the right direction, and we especially support the proposed bike lanes and bike paths along Lincoln (south of Jefferson to LMU Drive). The additional turn lane from Lincoln Blvd. north to Culver Blvd and extra lane along Culver to the Marina 90 freeway will help traffic somewhat. The planned Marina Freeway bridge over Culver Blvd. will also help somewhat considering the simultaneous high density development coming to the Marina area and Playa Vista. However, [P]hase II offers no similar traffic mitigations. We were disappointed that the Coastal Commission has yet to approve any improvement to Lincoln Blvd. north of Jefferson, especially over Ballona Creek.

Response 222-3

The traffic impacts associated with the First Phase Playa Vista Project were addressed in a separate EIR (EIR No. 90-0200-SUB(C)(CUZ)(CUB), State Clearinghouse No. 90010510), certified by the City of Los Angeles in September 1993, and Mitigated Negative Declaration/Addendum to the EIR, certified by the City of Los Angeles in December 1995. The Draft EIR analyzed the traffic impacts of the Proposed Village at Playa Vista Project assuming a full build out of the adjacent First Phase Project at Playa Vista, as well as all other known projects expected to be completed in the study area.

The comment appears to refer to a Caltrans improvement known as “Lincoln North,” which was denied by the California Coastal Commission in January 2003. The Lincoln North improvement is not required for implementation of the Proposed Project or mitigation of any significant impacts identified in the Draft EIR.

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

Comment 222-4

The [P]hase II proposed bike paths are also a nice improvement. We like the proposed bike lanes proposed within Playa Vista and hope that adequate, well lit, safe bike parking will be available for the visitors and employees at The Village. However, at a minimum, we recommend that you insist that the developer provide a safe bike connection to/from Playa Vista to both the Ballona Creek bikeway and to the beach bike path through Marina Del Rey on Admiralty Way. Widening Lincoln over Ballona Creek and/or adding a 2nd bridge to safely accommodate both bikes and cars along Lincoln is essential.

Response 222-4

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

Pursuant to State CEQA Guidelines, the Draft EIR analyzes the impacts of the Proposed Project and where necessary proposes mitigation measures to address the Project’s impacts. As indicated in Subsection 3.4.1, Proposed Project Impacts, of Section IV.K.(3), Bicycle Plan, of the Draft EIR on page 961, the Project’s Class II lanes would link with other bikeways, would be compatible with adjacent Playa Vista First Phase Project bikeways and provide enhanced service for the Proposed Project’s population, Playa Vista First Phase Project’s population and regional travelers passing through the site on their longer journeys. The new bikeways would improve the quality of bikeway service. The regional bike trails mentioned in the comment are identified in Subsection 2.2.2 of Section IV.K.(3) on page 956. Further connectivity with Class I Trails would not serve to mitigate any significant impacts identified in the Draft EIR.

As described in the Draft EIR on page 297, “The Project’s proposed bikeway routes have been designed to link major activity centers within the Project site (e.g., Village Center retail uses and proposed residential uses) and as such, provide an alternative means of transportation to the automobile. The Project’s proposed network of interconnected bicycle routes provides access throughout the Project site and connects to, and expands on, the bicycle network within the adjacent Playa Vista First Phase Project. The bicycle facilities are being designed to meet all applicable safety standards. In addition, bicycle racks would be provided in public areas (e.g., parks, community facilities, etc.) and in the Village retail area, and bicycle storage areas would be provided within the residential buildings.”

Comment 222-5

In addition, we would like to see a Light Rail connection from the existing Green Line in El Segundo to LAX, Westchester, Playa Vista, Marina Del Rey, Venice, to Santa Monica, and connect to the planned Expo Light Rail, north/south along Lincoln Blvd. corridor and/or along 405 freeway/Sepulveda corridor. In the future, the fast rail connection should be extended further north to UCLA, Westwood, and to San Fernando Valley. Playa Vista should be connected to the growing Southern California rail network, which now has over 100 Metrolink and Metrorail stations.

I have traveled daily along Lincoln corridor for about 20 years. Unfortunately, traffic and development have continued to grow along many sections of this corridor. This busy corridor needs to be improved for all forms of mobility: car, bike, and mass transit. Improving flow along Lincoln Blvd. will reduce air pollution and improve quality of life for employees on the Westside and my neighbors who live in Playa Vista, Westchester, Venice, El Segundo, and Santa Monica.

Response 222-5

These comments are noted and will be incorporated into the Final EIR for review and consideration of decision-makers. As discussed in Response 222-1, with mitigation the Proposed Project would not result in any significant traffic impacts.

There are no current plans for light rail from the Green Line to any of the destinations identified in this comment. The Lincoln Corridor Task Force is currently studying alternatives to improve traffic conditions on Lincoln Blvd., including a Light Rail alternative. With implementation of the mitigation program discussed in the Draft EIR and in Section II.15, Corrections and Additions, of the Final EIR on page 216, the Proposed Project would not have any significant traffic impacts. Nevertheless, as discussed on page 7 of Appendix K-1 of the Draft EIR, in the event the Lincoln Corridor Task Force adopts a set of regionally superior traffic improvements that are equivalent or superior in mitigating the project-related traffic impacts of the Proposed Project, prior to implementation of the Proposed Project or its mitigation measures the City may require the Proposed Project to contribute towards the implementation of the Task Force's improvements in an amount not greater than the Project improvements being superceded.

LETTER NO. 223

Robert Welder
8832 Villanova Avenue
Los Angeles, CA 90045

Comment 223-1

I strongly support The Village project because it is the essential component to completing Playa Vista and making it successful as an inclusive, diverse mixed-use community. The Village will provide critically needed housing near local employers, as well as create new jobs for this community.

Additionally, I support the current proposal which will provide needed open space and park land--through the preservation of land west of Lincoln and north of the Ballona Channel as open space, as well as the creation of 23 acres for new parks and open space within the development.

This is an important project that should be approved by the City. I strongly encourage the City of Los Angeles to approve The Village at Playa Vista.

Response 223-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 224

Dawn Wendl
2864 Pinckard Avenue
Redondo Beach, CA 90278

Comment 224-1

Many roads around Playa Vista have been neglected for decades and have been a contributing factor to the area's traffic problems for years. Playa Vista committed more than \$100 million in its first phase to improving transportation in the immediate area and in approximately 100 square miles of the region. Those improvements have already helped traffic flow.

The Village will build on Playa Vista's commitment to improve flow in the surrounding area and encourage mass transit. Developing The Village will allow many of its residents to live closer to where they work, thus shortening the time they spend on roads and freeways. Also, the installation of state-of-the-art, computerized traffic control systems will further improve flow.

What's unique and impressive about the traffic mitigation measures for The Village is the reach and diversity of programming. For example, the transportation plan also calls for extended bus and shuttle service from Playa Vista to major employment and entertainment centers, such as Fox Hills Mall, Howard Hughes Center, Marina del Rey, UCLA and Century City.

The Village is a solid proposal with an excellent transportation component. I support adoption of the EIR by the City Council, and look forward to seeing the improvements go from concept to implementation.

Response 224-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 225

Greg Wenger
Greg Wenger Photography
Post Office Box 9550
Marina del Rey, CA 90295

Comment 225-1

The transportation infrastructure in our part of West Los Angeles is outdated, in need of modernization and reliant on Playa Vista for capacity building. The Village plan does just that. It includes the completion of the Jefferson widening adjacent to Playa Vista (from Lincoln all the way to Centinela), as well as completion of a new four- to six-lane road within Playa Vista called Bluff Creek Drive, allowing traffic a new east-west alternative running parallel to Jefferson.

Major enhancements to the local and regional transit system are also proposed, including adding buses to two lines to improve frequencies and ease overcrowding, establishing a new bus route serving the area from the Fox Hills Transit Center to the Green Lane, and extension of a bus line running from the Fox Hills Transit Center to the Village and Playa del Rey.

Furthermore, installing the latest in computerized traffic control systems will improve flow, and there will be measures during construction to minimize traffic disruptions.

These improvements will have a positive impact throughout the region, and are significant in that they promote public transit and a live/work balance that is a rarity in Los Angeles.

Response 225-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 226

Marvin West
11990 Art Street
Sun Valley, CA 91352

Comment 226-1

The Los Angeles Times never seems to say a kind word about development, but recently, the paper changed its tone. On the first page of the paper, the Times called Playa Vista a “new urban model.”

Such praise doesn’t come lightly, but it’s deserved. I’ve lived in the area a long time, and seen concepts for Playa Vista come and go. I’m impressed with the development, especially the number of parks and the diversity of architecture.

What I don’t understand is why the middle area where The Village is supposed to go isn’t approved already. A growing community like Playa Vista needs retail to serve the homeowners’ needs. And it won’t hurt to add more housing to an area hungry for new homes.

The City should move The Village forward without delay.

Response 226-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 227

William West
H. B. Drollinger Co.
8929 South Sepulveda Boulevard, Suite #130
Los Angeles, CA 90045

Comment 227-1

After reviewing the draft environmental impact report for The Village at Playa Vista, the numbers tell a compelling story and list many reasons this project should be approved. They include:

- The Village at Playa Vista will further assist in alleviating the housing crisis in this region and the City of Los Angeles by providing 2,600 new housing units at varying prices
- Developing The Village will create nearly 8,000 construction jobs for our local workforce.
- There will be an additional 1,000+ retail, commercial and related jobs in The Village.
- The Village will result in new City of Los Angeles tax revenues of \$4 million annually, plus additional revenue to Los Angeles County and the region.

This adds up to one clear conclusion: The Village is good for Los Angeles and should be approved by the City Council, and therefore, we urge the Planning Commission and City Council to approve this much-needed development.

Response 227-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 228

Denis Will
12770 Pacific Avenue, #8
Venice, CA 90291

Comment 228-1

With its Village proposal, Playa Vista is going to add 2,600 new single family homes, condos and apartments to a house-starved west Los Angeles real estate market. The project is going to add thousands of construction jobs during a time when the economy could use a shot in the arm. I also understand that the Village will generate \$4 million a year to the City of Los Angeles' general fund.

What's not to like? This is a smart project that is far smaller and far smarter than what was originally planned for the site. It provides for long overdue transportation improvements, the addition of new parks and public transit enhancements that extend throughout the west L.A. region.

I support the Village. It's good for the City and good for the local area. I encourage the City to approve it in its current form.

Response 228-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 229

Cindy Williams
C. W. Business Center
8939 South Sepulveda Boulevard, #102
Los Angeles, CA 90045-3605

Comment 229-1

Playa Vista's developers continue to live up to their promises to make this a place where people can live, work and play. Their plans for the Village are respectful of the environment and contribute well more than Playa Vista's share to improve the traffic situation on the Westside.

The Village at Playa Vista will be a great addition to this community and the area, and I hope city leaders will ignore Playa Vista's critics and green-light this project.

Response 229-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 230

William J. Wolitarsky
Community Bible Church
6133 Bristol Parkway, #270
Culver City, CA 90230

Comment 230-1

I have lived at Playa Vista since April of this year; and I love every day I have been here. All of my expectations have been met and more to date.

However, the only thing that would make this neighborhood significantly better is the addition of the restaurants and stores planned for The Village.

Every community needs the local restaurant hangout and the corner barbershop. Ours is no exception. The Village must be approved to round out the experience that is Playa Vista.

Response 230-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 231

Danny Wong
126 Rees Street
Playa del Rey, CA 90293

Comment 231-1

As a Playa del Rey resident, I have watched the Playa Vista project carefully over the years. I am writing today to say that I am happy that the project has been scaled down significantly from the Summa days.

Our hopes are that this new, smaller version will have fewer impacts on the surrounding communities so residents can maintain a high quality of life. I am very glad to see that the housing plans incorporate park and open space sites.

I would, however, suggest that the city encourage Playa Vista to look into making the former Jake's restaurant site in Playa del Rey into a park. There are far too few parks in Playa del Rey and the Jake's site would make a perfect location for a park that everyone in the neighborhood could enjoy.

Response 231-1

The comment is noted and will be forwarded to the City decision-makers for their review and consideration. The parcel known as the Jakes' Lot is owned by an affiliate of the Project Applicant. The City and the Applicant and its affiliate are working to identify an appropriate future use for this lot.

LETTER NO. 232

K. Wong
5801 South Kiyot Way, #12
Playa Vista, CA 90094

Comment 232-1

I read in the Los Angeles Times that Playa Vista has become a model for urban planning. The development received that distinction, in part, because of the higher densities for housing.

Those densities make good sense because it helps to create more open space. But more importantly, higher densities create opportunities for people to use public transit.

I understand that The Village will have a public transit hub for buses that will take people to employment centers in the region as well as to local shopping districts. What a great idea!

It's about time that the City implement sound land use and transit planning. I support what Playa Vista is trying to do, and wish others would do the same.

Response 232-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 233

Lew Wright, Sr.
FASTFRAME of Westchester
8925 South Sepulveda Boulevard
Westchester, CA 90045-3603

Comment 233-1

As a small business owner In Westchester, I understand that the new plans for Playa Vista's scaled down second phase do not include the major retail component originally envisioned.

By reducing the size and scope of the commercial development at The Village, Playa Vista has assured that major retailers will not impact area small businesses like mine. In fact, the new residents who move into The Village will likely patronize and improve my business, as well as, other local merchants.

I support The Village and look forward to its completion. Thank you.

Response 233-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.

LETTER NO. 234

Nicole Xanten
9018 Villanova Avenue
Los Angeles, CA 90045

Comment 234-1

The Village plan is projected to create 8,000 construction jobs and generate \$4 million a year in tax revenues to the city. At the same time, The Village is providing desperately needed new housing to the area and enabling the development of a neighborhood retail center for Playa Vista residents.

Right now, this property is abandoned, has no environmental value and is an eyesore. Also, it sits on abandoned land directly adjacent to the first phase of development at Playa Vista.

The Village is a natural next step for Playa Vista. It is a sensible and reasonable development plan that will improve the local community and generate millions of dollars in revenue for our cash-strapped city government.

The Village deserves prompt city approval.

Response 234-1

The comment is noted and will be incorporated into the Final EIR for review and consideration of decision-makers.