

**APPENDIX E**  
**COMMENTS AND RESPONSES TO COMMENTS**



RESPONSES TO PUBLIC COMMENTS  
ON THE  
PARK TO PLAYA TRAIL  
INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION  
SCH NO. 2013011021

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

Prepared by | BonTerra Consulting  
225 South Lake Avenue, Suite 1000  
Pasadena, California 91101  
T: (626) 351-2000 F: (626) 351-2030

May 2013

**TABLE OF CONTENTS**

<b><u>Section</u></b>	<b><u>Page</u></b>
<b>1.0 Introduction .....</b>	<b>1</b>
<b>2.0 Project Description .....</b>	<b>1</b>
<b>3.0 Public Review of IS/MND .....</b>	<b>1</b>
<b>4.0 Meeting Comments on IS/MND .....</b>	<b>2</b>
<b>5.0 Written Comments Received and Responses .....</b>	<b>8</b>
<i>Comment Letter A: Los Angeles County Department of Public Works .....</i>	<i>8</i>
<i>Comment Letter B: Carolyn Klemer.....</i>	<i>9</i>
<i>Comment Letter C: Bobbi Gold .....</i>	<i>12</i>
<i>Comment Letter D: Los Angeles Department of Water and Power.....</i>	<i>17</i>
<i>Comment Letter E: Chevron.....</i>	<i>20</i>
<i>Comment Letter F: Santa Monica Bay Restoration Commission .....</i>	<i>21</i>
<i>Comment Letter G: Department of Toxic Substances Control .....</i>	<i>24</i>
<i>Comment Letter H: Plains Exploration and Production Company.....</i>	<i>29</i>
<i>Comment Letter I: Cone Fee Trust.....</i>	<i>69</i>
<i>Comment Letter J: County of Los Angeles Fire Department.....</i>	<i>86</i>
<i>Comment Letter K: Governor’s Office of Planning and Research.....</i>	<i>88</i>
<b>6.0 Changes to the IS/MND.....</b>	<b>89</b>

**LIST OF TABLES**

<b><u>Table</u></b>	<b><u>Page</u></b>
H1 Suggested Noise Measurement Durations .....	62

**ATTACHMENT**

A Comment Letters

## 1.0 INTRODUCTION

This document has been prepared to provide responses to comments received on the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Park to Playa Trail (project). While the California Environmental Quality Act (CEQA) and the CEQA Guidelines do not require formal responses to public comments on the IS/MND, responses are provided below for comments submitted to the Baldwin Hills Regional Conservation Authority (BHRCA) to assist the BHRCA, as the Lead Agency under CEQA, in considering the comments received and the responses to these comments along with the IS/MND, prior to making a decision on the project. The responses to each comment letter have also been provided to those who submitted the comments.

## 2.0 PROJECT DESCRIPTION

The western portion of the Park to Playa Trail consists of the Ballona Creek Bike Path in Culver City and the Marvin Braude Bike Path in Playa del Rey, which are complete and are not part of the current project. The eastern portion of the Park to Playa Trail would be an approximate 7.0-mile-long, comprehensive system of developed trails that would connect various recreational areas and facilities in the Baldwin Hills area. This portion of the trail would include improvements to existing formal and informal trails, as well as the development of new trails in the Blair Hills area. The improvements would involve the resurfacing, widening, and realigning of existing trails; providing fencing, wayfinding signs, and trailhead facilities (i.e., information kiosks, shade structures, benches, bike racks, and trash cans); landscaping with native plants and restoring habitat in disturbed areas adjacent to the trail; reconstructing sidewalks, crosswalks, and bike lanes; and restoring the drainage channel. The Park to Playa Trail would provide connections from Ruben Ingold Park, Norman O. Houston Park, Kenneth Hahn State Recreation Area (KHSRA), Baldwin Hills Scenic Overlook, Blair Hills Park, and Culver City Park to the Ballona Creek Bike Path.

## 3.0 PUBLIC REVIEW OF IS/MND

The IS/MND for the proposed Park to Playa Trail has been completed in compliance with CEQA and the CEQA Guidelines. In accordance with Section 15073 of the CEQA Guidelines, a 30-day public review and comment period (from January 16 to February 18, 2013) was established to allow affected and interested agencies with an opportunity to provide comments on the IS/MND and the project's environmental review process. The IS/MND was distributed to Responsible and Trustee Agencies, other affected public agencies, and interested parties at the start of the review period. In addition, a Notice of Intent to Adopt an MND was published in the *Los Angeles Times* on January 16, 2013. The IS/MND was also made available for review at the following locations and websites:

***Los Angeles River Center and Gardens***

570 West Avenue 26, Suite 100  
Los Angeles, California 90065  
<http://smmc.ca.gov/BHRCA.asp>

***View Park Library***

Reference Desk  
3854 54<sup>th</sup> Street  
Los Angeles, California 90043

<http://www.colapublib.org/lib/viewpark/index.php>

***Culver City Julian Dixon Library***

Reference Desk  
4975 Overland Avenue  
Culver City, California 90230

<http://www.colapublib.org/lib/culvercity/index.php>



#### 4.0 MEETING COMMENTS ON IS/MND

A public meeting was held at the KHSRA Community Meeting Room on January 30, 2013, at 6:30 PM to present the project to interested individuals and to solicit comments on the IS/MND. During the meeting, a number of comments were raised. These comments are summarized below, with responses provided under each comment.

**Comment 1:** Bobbi Gold asked if hazards associated with subsidence were analyzed.

**Response 1:** Subsidence and other geologic and seismic hazards are discussed in Section 4.6 of the IS/MND. As stated in the first and second paragraphs under c) on page 4-49, subsidence has occurred in the Baldwin Hills area, but the proposed trail improvements would not create or increase subsidence hazards. Also, the proposed trail improvements would be built to current engineering standards and geotechnical regulations to ensure their structural integrity. Thus, subsidence is not expected to adversely affect the trail, trail users, or property surrounding the trail.

**Comment 2:** Carolyn Klemer lives in the house north of the proposed Blair Hills Trail and has a concern that she will hear noises from trail users. She also has safety concerns regarding the existing 6-foot chain-link fence and wants more dense trees along the trail. She asked when the trail alignment will be finalized; when construction plans will become available; and how the residents will know that the final plans reflect the discussions with residents.

**Response 2:** The preliminary trail alignment for Segment C would be located approximately 10 feet from the northern property line of the BHRCA-owned parcels within Segment C where it goes over the underground storm drain pipe, just west of La Cienega Boulevard. At other locations, it will be located approximately 25 to 40 feet from the property line, depending on the local terrain and other site constraints. Section 4.13, Noise, on pages 4-84 to 4-89 of the IS/MND discusses potential noise impacts from the project. Construction noise is expected to be less than significant with compliance with existing noise regulations and the implementation of noise-control measures outlined in the IS/MND. As discussed under Section 4.15, the proposed trail in Segment C would be separated from adjacent residences by fencing and subject to patrol by the County Sheriff's Department and the Culver City Police Department. These agencies would also enforce existing laws for trail use. No major public safety impacts are expected.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments and construction details are still being worked out for this second phase of the project. At this time, there is no set schedule for completion of the construction plans for this segment. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. The BHRCA will also work with abutting property owners to block views from the trail into residential yards.

**Comment 3:** Liz Gosnell raised potential traffic and pedestrian hazards at Jefferson Boulevard and Duquesne Avenue and the La Brea Avenue/Overhill Drive/Stocker Street intersection (known as the Five Points Intersection), as

more trail users would cross the streets. She said that it appears as though (without reading the document fully) that the IS/MND does not address projected foot/bicycle traffic, which will ultimately affect vehicle traffic patterns. She mentioned that there have been pedestrian deaths and if the project increases the numbers of pedestrians, it may increase the danger. Pedestrian accidents may increase at the Five Points intersection with the project's proposed parking lot at this intersection. Also, the document does not address a projected car traffic increase based on the potential increased future usage of the various parks. This information needs to be provided in an EIR. She suggested separate lanes on the bridge for pedestrians and cars. The Master Plan for Baldwin Hills discusses bridges and the commenter asked if the project is consistent with the Master Plan. She also asked if there is an estimate of the number of trail users now and in the future; and that this info needs to be in the document.

**Response 3:** While trail users may cross street intersections and be exposed to traffic hazards, the pedestrian crosswalks and sidewalks at these streets have been constructed to promote public safety (with lane striping, signs, signal phasing, and sight lines, among others). As noted on page 4-106 of the IS/MND, Regulatory Requirement (RR) 4.16-2 requires that crosswalks, sidewalks, and trail crossings on public rights-of-way be signed and improved in accordance with the California Manual on Uniform Traffic Control Devices (MUTCD). The California MUTCD adopts uniform standards and specifications for traffic-control devices, including all signs, signals, markings, and other devices used to regulate, warn, or guide traffic on streets or highways, pedestrian walkways, and bikeways. The standards include temporary traffic controls during construction; traffic controls for school areas; and traffic controls for highway-rail/light rail transit grade crossings. In addition, warning and traffic safety signs would be provided throughout the proposed trail alignment to promote safety for trail users. Therefore, a substantial increase in traffic hazards would not be created by the project.

The parking lot proposed at the Five Points intersection will primarily serve users of the adjacent Ruben Ingold Park and the nearby trails. This parking lot is not expected to be a destination in itself that will attract new users. Rather, it will only serve users of existing adjacent parks. The limited number of trail users that would be generated by the project is not expected to lead to any major increase in pedestrian crossings at local streets and these crossings will not all occur during weekday peak hours when traffic volumes are highest.

Peak use of the trail is expected to occur on the weekends when the local circulation system is off-peak. If 50 percent of the proposed new parking supply is utilized by trail users driving to the trailhead during one peak hour on a Saturday morning, then the additional vehicular traffic added to adjacent roadways is conservatively forecasted to be only 25 vehicles. The limited number of vehicles added to the roadway system during the weekend and outside the peak hours would have minimal impacts to local traffic volumes.

In preliminary plans, the proposed pedestrian sidewalk/bikeway on the south side of the bridge over La Cienega Boulevard is planned as a sidewalk extension, separated from the vehicle travel lanes on the bridge by a low fence and decorative railing.

The KHSRA General Plan Amendment and the Baldwin Hills Master Plan are discussed on pages 4-76 to 4-77 of the IS/MND. Consistency of the project with these plans is discussed on pages 4-78 to 4-80. The KHSRA General Plan Amendment talks about the Baldwin Hills Master Plan that calls for a land bridge over La Cienega Boulevard (south of the existing bridge). In both the General Plan Amendment and Master Plan, safe access through a pedestrian bridge over the Five Points intersection is discussed under constraints related to roads and traffic. The provision of pedestrian bridges at key access points, including the Five Points intersection, is considered an opportunity for easy access and connections. Under the General Plan Amendment, bridges are allowed in both Resource Protection and Beneficial Use management zones. A pedestrian bridge over Jefferson Boulevard is also called out in the General Plan Amendment guidelines. Similarly, the Baldwin Hills Master Plan calls for pedestrian bridges over Jefferson Boulevard and the Five Points intersection. However, the conceptual plans for pedestrian bridges are not part of the proposed project.

The proposed Park to Playa Trail does not propose any land or pedestrian bridge over La Cienega Boulevard, Jefferson Boulevard, or the Five Points intersection. Projected trail users are not expected to be in high numbers and crossing the streets at all times of the day or during weekday peak hours (when vehicle traffic volumes are highest) so as to require a pedestrian bridge over La Cienega Boulevard, Jefferson Boulevard, or the Five Points intersection. However, the feasibility of a pedestrian bridge over La Cienega Boulevard is being re-evaluated. At the same time, the project does not preclude future construction of these bridges as part of the implementation of the KHSRA General Plan Amendment and Baldwin Hills Master Plan by other agencies. Instead, the project supports these plans through improved connections that would be provided by the proposed trail. No conflict with these planning documents would occur with the project.

There has been no comprehensive survey on the number of trail users within Culver City Park, the Baldwin Hills Scenic Overlook, the KHSRA, or the Stocker Corridor. Park visitors at the KHSRA in 2012 have been counted by the County Department of Parks with monthly totals varying from 1,192 visitors in December (an average of 38 visitors per day) up to 7,230 visitors in July (an average of 233 visitors per day). However, the KHSRA is a regional park with a wide variety of recreational facilities and features (i.e., picnic areas, a fishing lake, a Japanese Garden, a meeting room, playgrounds, sports fields, and trails) that make it a popular destination for park users. The Baldwin Hills Scenic Overlook is also a popular destination with developed facilities (i.e., trailhead, stairway, visitor center, trails, picnic area, and observation deck). But the proposed trail that would be connecting the two parks through the Blair Hills Corridor (Segment C) is not considered a destination. The trail will be passing through a relatively unimproved environment and will not feature amenities or facilities, except for an overlook/rest area. Thus, it will likely be used by only a small fraction of the KHSRA and the Baldwin Hills Scenic Overlook users, which conservatively can be estimated at a maximum of a few dozen trail users per day. The anticipated extent of trail use will represent a fraction of the total park users and is not projected to be so heavy or crowded that it would exceed the capacity of the trail as designed. Based on the determination that there will be a relatively limited number of trail users anticipated on the proposed trail in

Segment C, count projections are not necessary to evaluate the potential impacts of trail use.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment 4:** Bobbi Gold asked if it would be possible to put gates at the end of the bridge ramp at La Cienega Boulevard and into Blair Hills to close the trail after hours.

**Response 4:** The final design for Segment C has not been completed, and the BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns for the trail in Segment C.

The Los Angeles County Department of Parks and Recreation will be operating and maintaining the trail in Segment C. The Department's current policy does not include locking trails from dusk until dawn. However, the parks where the trail will be accessed, including the KHSRA and the future Stoneview Nature Center, will be closed from dawn to dusk, thereby preventing access after hours. Also, in the event that after hours access becomes a problem, the Department will work with the community and consider locking a gate at La Cienega Boulevard from dusk until dawn.

**Comment 5:**

Comments:

*Buffer areas -*  
*Between the proposed trails and property lines there should be a buffer of at least 25' feet to protect property owners*

*No future entrance to the County owned future park located on Stoneview Dr*

Name: DOROTHY STEINER *This was a promise made by the county people when meetings were held.*

Address: 5964 STONEVIEW DR *Only entrance would be on Stoneview Dr*

City/State/ZIP: CULVER CITY, CA 90232 - 3017 *310-839-3477*

**Response 5:** The preliminary alignment for the eastern section of the proposed trail in Segment C will be located away from residential property lines, except for the section west of La Cienega Boulevard where it goes over an underground storm drain line. At this point, the trail will be running near residential properties, approximately ten feet from the property line. However, it will be separated from residential properties by security fencing and a landscaped buffer. At other locations, the trail would be located from 25 to 40 feet from

the property line. The BHRCA will work with abutting property owners to block views from the trail into residential yards.

In preliminary plans, a connection to the abandoned school (where a future park may be located) is proposed at the eastern edge of the school property. However, no gate or opening to the existing, vacant site is planned as part of the Park to Playa Trail project until any improvements to the future park occur. Rather, the existing chain-link fence around the school site will remain, precluding use of the school site for access to the Park to Playa Trail. Any connection from the future park to the trail will be resolved during the design of the future park.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. The BHRCA will also work with abutting property owners to block views from the trail into residential yards.

**Comment 6:**

Comments:	I am not on board with this whole "trail" thing. I mean seriously, I don't want 24/7 noise while I'm trying to get my sleep. School is hard, and I need my sleep. I don't care what you people say, I like my backyard just the way it is. NOISLESS! I don't care when the noise is, NO NOISE or anything else. Thank you for your cooperation. P.S I don't want a bunch of people I don't know in my backyard.
Name:	Conner Klemes Age: 11
Address:	5912 Stoneview Dr.
City/State/ZIP:	Culver City 90232

**Response 6:**

It is acknowledged that noise impacts would occur with the project. Section 4.13, Noise, on pages 4-84 to 89 of the IS/MND discusses potential short-term and long-term noise impacts. As stated, short-term construction noise is expected to be less than significant with compliance with existing noise regulations (RR 4.12-1) and the implementation of noise-control measures (Mitigation Measure [MM] 4.12-1) outlined in the IS/MND. In the long term, there will be trail users and maintenance activities at Segment C, which would generate noise that would be audible at adjacent land uses. However, the noise increases would be intermittent and, when considered in the context of the existing noise levels and other similar neighborhood noise sources, would result in an increase less than 1 A-weighted decibel (dBA) and would not be audible or considered significant.

In preliminary plans, the existing fence along the property line in the eastern section of Segment C would be replaced and no direct access to adjacent residences or their backyards would be provided. Unauthorized access or trespassing would be a crime that would be subject to law enforcement by the Culver City Police Department and the County Sheriff's Department.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. The BHRCA will also work with abutting property owners to block views from the trail into residential yards.

## 5.0 WRITTEN COMMENTS RECEIVED AND RESPONSES

During the public review period from January 16 to February 18, 2013, a number of written comments were received on the IS/MND and the project. These included the following letters and emails (with the dates in parentheses):

- A. Los Angeles County Department of Public Works (January 14, 2013);
- B. Carolyn Klemer (January 22 and 23, and February 17, 2013);
- C. Bobbi Gold (January 23, 27, and 28 and February 1, 2013);
- D. Los Angeles Department of Water and Power (January 30, 2013);
- E. Chevron (January 28, 2013);
- F. Santa Monica Bay Restoration Commission (February 11, 2013);
- G. Department of Toxic Substances Control (February 12, 2013);
- H. Plains Exploration and Production Company (February 15, 2013);
- I. Cone Fee Trust (February 18, 2013);
- J. County of Los Angeles Fire Department (February 5, 2013); and
- K. State of California Governor's Office of Planning and Research (February 15, 2103).

These comment letters are provided in Attachment A. A response to each comment contained in these letters is provided below.

### **Comment Letter A: Los Angeles County Department of Public Works (January 14, 2013)**

#### **Comment A1:**

Public Works has reviewed the Initial Study/Mitigated Negative Declaration and concur that a MND is the appropriate document. It is suggested however, that if reclaimed water will be available at the site for landscaping purposes it be properly disclosed within the document.

In addition, we would request any addendums or any future plans/documents associated with this project be submitted to Public Works.

**Response A1:** Comments noted. As discussed under Section 4.18.1 in the third paragraph on page 4-108 of the IS/MND, there are no recycled water lines near the trail alignment, although a future Tier 2 (long term) extension of a recycled water line in Inglewood Avenue to the corner of La Brea Avenue and Stocker Street is proposed by the City of Los Angeles. As such, recycled water is not expected to be available at the proposed landscaped areas along the trail alignment in the near future. The Los Angeles County Department of Public Works will remain on the mailing list for this project.



**Comment Letter B: Carolyn Klemer  
(January 22 and 23, 2013 and February 17, 2013)**

**Comment B1:**

I am a resident of Blair Hills and received this report over the weekend. My residence is on Stoneview Drive and backs up to the oil fields, the exact address is 5912. This is the first time I was able to see a map with property pictures. It clearly shows that the trail seems to meander a bit, mostly away from homes. For whatever reason, the trails takes a sharp turn towards my property and seems to go up to my property line. Please help me understand why this is necessary. I went to some of the meetings and we were assured that efforts would be made to keep the trail away from homes and that privacy measures would be taken. You can plant a hedge as tall as you like, but if the trail is right at my property line, I'm going to hear everything and see more than I would like. With that kind of proximity safety is always a concern, I have an elementary school age son at home with me too.

I would like to understand how this can be changed. I am aware that you have been at some of our meetings and have been involved in mitigating some of Blair Hills concerns. I hope that you can refer me and/or carry my concerns and request to those that need to hear it to make changes.

**Response B1:** Hayden Sohm of the Los Angeles County Department of Parks responded to this email (see Attachment A).

The exhibit of the overall trail alignment makes the trail appear to be on or right beside the residential properties in Blair Hills due to scale. Exhibits 3-1 through 3-9 of the IS/MND provide larger scale maps of the proposed trail by segment. As shown in these exhibits, the preliminary alignment for Segment C of the Park to Playa Trail would be located away from adjacent residences and would not encroach into private property. The trail would be located in the approximate alignment of the existing dirt road in some places and would be located away from the property lines to the north, except for the section west of La Cienega Boulevard where it goes over the underground storm drain line. At this point, the trail will be running near (approximately ten feet from) residential property lines. However, it will be separated from residential properties by security fencing and a landscaped buffer.

As discussed in the second paragraph on page 4-9 of the IS/MND, changes in long-term views due to trail improvements would be mainly at-grade and/or limited in size and at scattered locations. No significant adverse changes in visual quality would occur. Page 4-88 states that trail users will be on any one segment of the trail for short periods of time and on an irregular basis. Thus, noises from these users would also be infrequent and not considered significant. The trail would be separated from adjacent residences by fencing and the County Sherriff's Department and the Culver City Police Department would enforce existing laws on the trail. No major public safety impacts are expected.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, and stakeholders to address their concerns as the trail design for this



segment is finalized. The BHRCA will also work with abutting property owners to block views from the trail into residential yards.

Revisions have been made to the IS/MND to indicate that the proposed trail in Segment C is only a preliminary alignment, subject to further refinement and additional environmental review.

**Comment B2:**

The sharp turn is more about the trail going up to my property line and not further down near La Cienega. Perhaps I should have said 'curved' into my property line, regardless the drawing indicated that it hit the property line as I understood it. I am glad to hear that it may not be an accurate representation of the actual trail. Scale and distance are hard to understand on the map provided. I'm hopeful once that is better understood there will not be an issue.

**Response B2:** As shown in Exhibit 3-3 of the IS/MND, the preliminary trail alignment meanders within the Blair Hills Corridor, behind some residences in this area but will not encroach into private property. See Response B1 above.

**Comment B3:**

Although I attended the meeting on January 30th, I would like to submit my comments in writing. I live on Stoneview Drive and my property backs up to the trail. I have three concerns: privacy, noise and safety. To that end I request:

1. The oil fields don't bring people behind our houses. This trail introduces a whole new element of people and therefore potential security issues. As such, security fencing should be put between the trail and the houses on Stoneview.
2. Although there is a road behind our houses, I have never once seen nor heard a vehicle on that road. To preserve the quiet and privacy, keep the trail at least 25 feet from the houses to create some buffer. Also, please use soundproofing plants or consider a brick wall as the security fence to both secure and create privacy. The plants shown in the renderings, while attractive, won't create much of a sound barrier. I understand certain pine trees are some of the best choices for such a border.
3. Gates that lock in the evening from the La Cienega railway leading to the back of the houses may help towards keeping out undesirable people at night.

I would like to see construction drawings in order to fully understand scope and scale. Only then would I feel comfortable that further action on my part and that of my neighbors would not be required. Thank you for your consideration.

**Response B3:** The preliminary trail alignment for Segment C would be located approximately ten feet from the northern property line where it goes over the underground storm drain line, just west of La Cienega Boulevard. At other locations, it will be located approximately 25 to 40 feet from the property line, depending on the local terrain and other site constraints. As stated, the existing chain-link fencing behind the homes will be replaced with new fencing and a vegetated buffer will be provided along the trail. The BHRCA will work with abutting property owners to block views from the trail into residential yards.

Please note that the final design for Segment C has not been completed and the BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to address their concerns on this segment.

The Los Angeles County Department of Parks and Recreation will be operating and maintaining the trail in Segment C. The Department's current policy does not include locking trails from dusk until dawn. However, the parks where the trail will be accessed, including the KHSRA and the future Stoneview Nature Center, will be closed from dawn to dusk thereby preventing access after hours. Also, in the event that after hours access becomes a problem, the Department will work with the community and consider locking a gate at La Cienega Boulevard from dusk until dawn.

**Comment Letter C: Bobbi Gold  
(January 23, 27, and 28 and February 1, 2013)**

**Comment C1:**

From my examination of the maps and trail proposals over the past year or two, I think that there is a potential privacy issue where hikers on certain portions of the trail behind the old school property will be able to see into the back yards of adjacent homeowners. Somehow, the trail has to be routed away from line-of-sight problems or some large bushes and trees should be planted close together.

**Response C1:** The paragraph at the bottom of page 4-7 and the first paragraph on page 4-8 of the IS/MND acknowledges that the new trail in Segment C – Blair Hills Corridor would change the views of adjacent residents. The existing fencing between the residences and the proposed trail in the Blair Hills Corridor will be replaced and a vegetated buffer will be provided along the trail to screen residences from the trail. The discussion on page 4-9 states that changes in long-term views due to trail improvements would be mainly at-grade or limited in size and at scattered locations. Thus, they would not be considered substantial obstructions to existing scenic views of, or from, the Baldwin Hills. Changes in visual quality are discussed on pages 4-9 and 4-10, but are not considered significant adverse changes.

The preliminary trail alignment for Segment C would be located approximately ten feet from the northern property line where it goes over the underground storm drain pipe, just west of La Cienega Boulevard. At other locations, it will be located approximately 25 to 40 feet from the property line, depending on the local terrain and other site constraints.

In preliminary plans, trail users could have partial views of the backyards and side yards of adjacent residences from a distance because the ground is at a higher elevation southeast of the school site; however, it drops as it runs northeasterly through the eastern section of Segment C. See Exhibit 1 below for photographs of existing views. As the preliminary trail alignment nears the residential properties, the trail would be at a lower elevation than adjacent homes and trail users will not be able to see into the backyards of abutting residences due to the presence of a chain-link fence separating an easement for overhead power lines, rising slopes, property walls and fences, and existing vegetation. A vegetated buffer is proposed along the trail to obstruct views into adjacent residences. Also, the presence of trail users at any one location of the trail would only be for short periods of time and on an irregular basis. And while the residences would be visible to trail users through the fence and vegetated buffer and at distant vantage points, this impact is not considered significant.

Please note that the BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C. The BHRCA will also work with abutting property owners to block views from the trail into residential yards. When the alignment for the proposed trail in Segment C is set, it will be subject to additional environmental analysis and review.

Revisions have been made to the IS/MND to indicate that the proposed trail in Segment C is only a preliminary alignment, subject to further refinement and additional environmental review.



**Exhibit 1 – Photographs of Existing Views at Segment C**



**Looking northeast from the eastern edge of the school site**



**Looking east from dirt road just south of the property line**



**Looking west from the dirt road just south of the property line**



**Looking northwest from just south of the property line**



**Comment C2:**

First, we'd like to know the time of the meeting January 30, since we haven't received any notice. Would you (or Ms. Alido) send me and Ms. Klemer a formal notice or flyer that we can distribute to our neighborhood.

I live on Stoneview Drive also, although on the north side of the street. I've observed a privacy issue where the trail emerges from behind the former school and descends sharply downhill. At that point, people on the trail are able to see into the back yards of several of the homes. We did indeed discuss it at previous meetings and were told that the trail would be moved to solve the privacy problem. However, we've never seen any realignment drawings to address that issue. Do any exist, and if so, would you send them to me and Ms. Klemer.

**Response C2:** Notice of the public meeting was provided as part of the Notice of Intent to Adopt the Mitigated Negative Declaration for the Park to Playa Trail. This notice was published in the *Los Angeles Times* on January 16, 2013. It was also posted at the websites of the BHRCA, View Park Library, and Culver City Dixon Library. The IS/MND and the Notice of Intent were also mailed to public agencies, public service agencies, utility agencies, local libraries, and neighborhoods groups. In addition, the Notice of Intent was posted at the Kenneth Hahn State Recreation Area, the Baldwin Hills Scenic Overlook, and the Culver City Hall.

Various alignments for Segment C have been considered, based on meetings with residential property owners and the oilfield operator. The preliminary trail alignment is currently proposed to meander through the Blair Hills Corridor, as shown on Exhibit 3-3 of the IS/MND. The existing fencing between the residences and the proposed trail will be replaced and a vegetated buffer will be provided along the trail to screen residences from the trail. See Response C1 above regarding views from the trail.

The BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C. The BHRCA will also work with abutting property owners to block views from the trail into residential yards.

**Comment C3:**

One comment about the IS-MND: it reports that Culver City has a View Preservation ordinance, which is true, but it concludes that that would prevent trees from being planted that could shield Blair Hills residents from negative aspects of the trail segment from the Scenic Overlook to KHSRA. That is NOT true. The Ordinance specifically exempts City-owned trees from its requirements, and I can't see how it could apply to trees or shrubs on County-owned land. Besides, the residents along Stoneview Drive (all 6 houses, including one between the former school and Blair Hills park) might very well prefer trees that hide the sight and sounds of passersby on the trail, as well as the oilfield equipment. I think that it would be wise to talk to those 6 families to see what they'd prefer. (Actually, three of those homeowners are in poor health and not able to participate in these discussions now, and two of the others have young children which make it hard to attend public meetings in the evening.)

**Response C3:** The existing fencing (between the residences and the preliminary trail alignment for Segment C) in the Blair Hills Corridor will be replaced and a vegetated buffer will be provided along the trail. The IS/MND does not state that trees would not be planted between the trail and residences. Rather, it summarizes the Culver City regulations that would prevent major changes in the available views of residents in Blair Hills.

Please note that the BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and the proposed improvements for Segment C. The BHRCA will also work with abutting property owners to block views from the trail into residential yards.

**Comment C4:**

We in Blair Hills request gates at each end of the trail segment that can and will be locked from dusk to dawn.

It would be very easy for people to be on the trail segment illegally after dark by walking the short distance from Blair Hills streets up the La Cienega offramp to the bridge. And if they're there illegally, they're probably doing something else illegal.

**Response C4:** As stated earlier, the BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C.

The Los Angeles County Department of Parks and Recreation will be operating and maintaining the trail in Segment C. The Department's current policy does not include locking trails from dusk until dawn. However, the parks where the trail will be accessed, including the KHSRA and the future Stoneview Nature Center, will be closed from dawn to dusk thereby preventing access after hours.

The Los Angeles County Sherriff's Department and the Culver City Police Department would be responsible for law enforcement activities on the trail and in the surrounding areas. In the event that after-hours access becomes a problem, the County Department of Parks and Recreation will work with the community and consider locking a gate at La Cienega Boulevard from dusk until dawn.

**Comment Letter D: Los Angeles Department of Water and Power  
(January 30, 2013)**

**Comment D1:**

Thank you for the opportunity to review the Notice of Intent to Adopt a Mitigated Negative Declaration and Initial Study for the Baldwin Hills Regional Conservation Authority's Park to Playa Trail Project. This project, consisting of the creation of a comprehensive system of developed trails to connect recreational areas in the Baldwin Hills to the beach, would cross underneath the Los Angeles Department of Water and Power's (LADWP) Fairfax-Airway and Fairfax-Gramercy Transmission Lines. Therefore, please address the following items:

- 1) The applicant shall acknowledge the LADWP transmission line rights of way are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation (NERC). Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion and emergency operations. Therefore, the proposed use may from time to time be subject to temporary disruption caused by such operations.
- 2) Provide plans illustrating the LADWP's transmission line right of way boundaries within BHRCA's Project. Include towers and clearances from proposed improvements. Also, provide grading plans, storm drain plans, and street plans, including any other plans illustrating the impacts to the LADWP's transmission line right-of-way.
- 3) Conductor Clearances will be subject to the review and approval of the Transmission Engineering Group. The LADWP may need a copy of the conductor survey illustrating the cross sections showing our existing conductors and proposed improvements. See attached LADWP Conductor Survey Instructions. The Transmission Engineering Group will use the data to calculate and confirm conductor clearances meet the State of California, Public Utilities Commission, General Order No. 95 clearances.

4) All construction activities shall adhere to the LADWP's Standard Conditions for Construction. See attached.

5) Provide the location and elevations (heights) of all above and below ground structures, including the cross sections of existing and proposed improvements within and adjacent to the LADWP's transmission line right of way. All ground elevations are to remain unchanged from existing conditions after proposed improvements associated with BHRCA's Project are completed. Cut & fill slopes inside the LADWP's transmission line right of way steeper than 2 horizontal to 1 vertical require retaining structures or geotechnical report approval.

Note: Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than thirty feet or as noted in the State of California, PUC, General Order 95 within the LADWP's transmission line right of way is unacceptable. Ground cover for all below ground utilities shall not be less than four feet.



- 6) When grading activity affects the transmission line access roads, BHRCA shall replace the affected access roads using the LADWP's Access Road Design Criteria. See attached.
- 7) Cathodic protection system, if any, shall have a design that does not cause corrosion to the LADWP facilities. A detailed design of the cathodic protection system shall be submitted for approval to the LADWP.
- 8) All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with State of California Code of Regulations, Title 8, Section 2941, and National Electric Code, Article 250.
- 9) The right of way contains high-voltage electrical conductors; therefore, BHRCA shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders; and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
- 10) No grading shall be conducted within the LADWP's transmission line right-of-way without prior written approval of the LADWP.
- 11) No structures shall be constructed within the LADWP's transmission line right of way without prior written approval of the LADWP.
- 12) The LADWP prohibits drainage structures or the discharging of drainage onto the transmission line rights of way. Concentrated runoff can cause erosion especially to the transmission line tower footings.
- 13) BHRCA shall compact all fill slopes within the LADWP's transmission line right of way. The compaction shall comply with applicable Building Code requirements.
- 14) An area at least 50 feet around the base of each tower must remain open and unobstructed for necessary maintenance, including periodic washing of insulators by high pressure water spray.
- 15) No grading is allowed below the top of tower footing within the LADWP's transmission line right of way, in the immediate vicinity of the towers.
- 16) Additional conditions may be required following review of detailed site plans, grading/drainage plans, etc.
- 17) This reply shall in no way be construed as an approval of any project.

If you have any questions or need further information, please contact Mr. David Nevaraz of Power System Engineering, Right-of-Way at (213) 367-3621 or Ms. Julie Van Wagner of my staff at (213) 367-5295.

**Response D1:** The transmission lines through the KHSRA have been incorrectly identified as SCE transmission lines and have been revised in the IS/MND and exhibits. The project would need to follow the guidelines of the LADWP, as outlined in the comment, when constructing trail improvements within or near LADWP rights-of-way and/or easements.

**Comment Letter E: Chevron  
(January 28, 2013)**

**Comment E1:**

Chevron Pipeline Company has determined that it *has* facilities inside the scope of your proposed **Park to Playa Trail Project**. Along with this letter you will find information showing the location of Chevron facilities. **This information is considered confidential and must not be distributed for any other purposes outside of this project.** If depth or elevation of our facilities is required for your project we strongly recommend potholing. Use the Underground Service Alert process and a Chevron Field Inspector will respond and observe the potholing of CPL Facilities. Please review and adhere to our specification for working near our facilities. If you require other information about our facilities do not hesitate to call me.

If a conflict cannot be avoided and your project or your client's project is subject to the CEQA/NEPA (California Environmental Quality Act/ National Environmental Policy Act), then our work is an integral component of yours or your client's project (Action). As such, we will look to you or your client to acquire any and all resource agency permitting, necessary for our integral component of the Action. Additionally, we will look to you or your client to administer all applicable conditions and/or measures stemming from the Action's EIS (Environmental Impact Statement) or equivalent and/or associated permits.

**Response E1:** Pages 4-58 and 4-59 of the IS/MND acknowledge that there are pipelines in the area, including those owned by Chevron. The second paragraph under Section 4.8.2 b) on page 4-59 states that grading and excavation for the project may disturb oil and gas pipelines and lead to leaks, fire, explosions, and related hazards. Consistent with the requirements provided by Chevron, RR 4.8-2 calls for notification of and coordination with the pipeline's owner/operator and their approval and monitoring of activities near the pipeline to avoid damage to the lines and to prevent the creation of hazards to the surrounding area. The project would need to follow Chevron guidelines when constructing improvements over or near Chevron pipelines.

**Comment Letter F: Santa Monica Bay Restoration Commission  
(February 11, 2013)**

**Comment F1:**

Thank you for the opportunity to comment on this Notice of Intent (NOI) to adopt a mitigated negative declaration on the Park to Playa Trail system. The Santa Monica Bay Restoration Commission is pleased to express our support for the proposed project and to provide the enclosed comments regarding the proposed comprehensive system of developed trails that would connect recreational areas and facilities from the Baldwin Hills to the beach.

The Santa Monica Bay Restoration Commission (SMBRC) is a non-regulatory state entity established by California state law to act as a steward of the Santa Monica Bay, its watershed, and its resources. Our mission is to restore and enhance the Santa Monica Bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the Bay's benefits and values. We support projects that include both natural resource enhancements through the use of native Southern California flora as well as educational components, public access, and interpretive signage. Please see the attached detailed comments below.

**Response F1:** Comment noted. No response required.

**Comment F2:**

**General**

SMBRC supports the idea of the Park to Playa Trail connectivity between the Baldwin Hills and the beach. An extensive trail system aligns with the public access and educational components of our mission and our Bay Restoration Plan (BRP), which is our guiding document for project support. We only have comments and suggestions relating to some of the environmental issues assessed as having the "potential for significant adverse environmental impacts" and several that fall under the category of 'biological resources'. We are also aware that most of these impacts will be short-term as they are related specifically to construction.

**Response F2:** Comment noted. No response required.



**Comment F3:**

**Biological Resources**

- *Oak trees*: Oak tree replacement should equal or exceed the habitat value provided by the native oak trees that will need to be removed during the project, including nesting bird habitat, shade structure, and habitat complexity. To the extent possible, native vegetation should be left intact, or replaced at a higher ratio (or higher quality) to mitigate for the proposed impacts.
- *California buckwheat*: See above.
- *Biological monitors*: When appropriate or when vegetation is disturbed, we recommend that one or more biological monitors be present during those construction phases to halt equipment if mammals, herpetofauna, or birds are disturbed.
- *Irrigation*: Native plants to the southern California region should be used whenever possible to reduce the need for drip irrigation, though we recognize that some initial irrigation may be necessary to establish growth for the first few growing seasons.
- *Invasive species*: No species found on the Cal-IPC invasive species list should be planted or introduced to the project areas, and all invasives should be removed during enhancement and maintained throughout a post-construction monitoring period of no less than 5 years. Additionally, ornamental species and any species not native to Los Angeles County should be avoided throughout the enhancement project.

**Response F3:**

- *Oak Trees*: The IS/MND states on pages 4-29 and 4-30 that impacts to oak tree woodland (less than 0.1 acre) do not include any oak tree removal. Compliance with the Los Angeles County Oak Tree Ordinance (RR 4.4-1) and the City of Los Angeles Tree Ordinance (RR 4.4-2) will be required for any oak tree impacts. These regulations will ensure the protection, where feasible, of the oak trees and their contribution to wildlife, shade, and habitat complexity. Additionally, MMs 4.4-4 and 4.4-5 require pre-construction nesting bird surveys during the nesting bird season to protect avian species and their nests.
- *California Buckwheat*: The IS/MND states on page 4-36 that impacts to California Buckwheat Scrub, where unavoidable, will be mitigated through MM 4.4-1 at a ratio of no less than 1:1, either by on-site preservation or off-site restoration. Implementation of this MM will consequently provide California Buckwheat Scrub habitat that is protected and/or enriched, and of higher quality than existed prior to project implementation. Additionally, MMs 4.4-4 and 4.4-5 require pre-construction nesting bird surveys during the nesting bird season to protect avian species and their nests.
- *Biological Monitors*: The IS/MND states on pages 4-37 and 4-38 that a Biologist will conduct pre-construction nesting bird surveys (MMs 4.4-4 and 4.4-5). These surveys will ensure that fledglings are not inadvertently impacted by vegetation removal. A biological monitor is not required during vegetation removal in order to reduce impacts to common plant and wildlife species. Also, most foraging and dwelling wildlife (including mammals, herpetofauna, and birds) are likely to move away from active construction areas. Therefore, a biological monitor is not needed or proposed.

- *Irrigation:* As discussed on pages 3-1 through 3-3 of the IS/MND, native plant revegetation and restoration of native species would be made as part of the project. Select areas along existing and proposed trails with tuft grass or degraded native habitat will be replaced or restored to incorporate native or drought-tolerant plants. Drip irrigation would be used only where necessary to establish native plantings, and some areas along the trail with ornamental species would be revegetated with native plants and existing irrigation replaced with low-drip systems.
- *Invasive Species:* Pages 3-1 through 3-3 of the IS/MND discusses planting and restoring native species in disturbed areas along the trail, which will include the removal of invasive and non-native plants. The success criteria for native plant revegetation will be based on a high ratio of native to invasive species; these criteria will be included in the Habitat Mitigation Monitoring Plan that would be prepared when final construction plans are developed.

**Comment Letter G: Department of Toxic Substances Control  
(February 12, 2013)**

**Comment G1:**

Based on the review of the submitted document DTSC has the following comments:

1) The MND should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

**Response G1:** Review of the Envirostor, Envirofacts, and Geotracker databases is discussed on pages 4-56 and 4-57 of the IS/MND. The Envirostor database includes federal Superfund sites, State response sites, voluntary clean-up sites, school clean-up and investigation sites, sites under evaluation, military evaluations, corrective action sites, and monitoring wells. The Envirofacts database includes sites on the Aerometric Information Retrieval System and Air Facility System (AIRS/AFS), Superfund, Toxic Releases (TRI), Hazardous Wastes (RCRA Info), Water Dischargers (PCS/ICIS), Brownfields (ACRES), Biennial reporting (BR), RADInfo, and Toxic Substances Control Act (TSCA) system. The Geotracker includes underground storage tanks, land disposal sites, military sites, waste discharge requirement sites, clean-up sites, hazardous waste permit sites, and monitoring wells. There are no sites in the National Priorities List (NPL), federal Superfund (or CERCLIS), and Formerly Used Defense Sites (FUDS) inventory that are located within 2.0 miles of the

trail alignment. Thus, aside from those discussed in the IS/MND, no other nearby hazardous material sites/users are listed in the databases mentioned.

**Comment G2:**

- 2) The MND should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

**Response G2:** For the proposed trail, compliance with existing hazardous material regulations (as called out in RR 4.8-1) is expected to serve as the main mechanism that will initiate any required investigation and/or remediation. For any contaminated soils in Segments C and H, MM 4.8-1 will be implemented, which requires Department of Toxic Substances Control (DTSC) concurrence for field oversight of grading operations.

**Comment G3:**

- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the MND.

**Response G3:** No investigation, sampling or remediation for the trail alignment has been done or is proposed. Should one be needed, in compliance with RR 4.8-1, it would have to be conducted under a work plan overseen by a regulatory agency. The findings of the Preliminary Endangerment Assessment and Supplemental Site Investigation for the Eastern Ridgeline Trail has been summarized into the IS/MND, although improvements are being planned independently by the County for this trail. As part of the Park to Playa Trail, improvements would be limited to signs that would be placed along this trail; an information kiosk; and revegetation at the southern end of the trail (on Segment H). No Phase I or II Environmental Site Assessments (ESAs) have been prepared. No closure, certification, or remediation approvals have been obtained or considered necessary.

The Baldwin Hills Community Standards District (CSD) Environmental Impact Report (EIR) indicates that there are hydrocarbon-contaminated soils from past and ongoing oil and gas operations in the Inglewood Oilfield, but these are considered non-hazardous and are being remediated by the oilfield operator through on-site bioremediation fields.



**Comment G4:**

4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken

during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

**Response G4:** No buildings or structures are proposed for demolition. However, the existing sidewalk and drainage channel in Segment E are proposed for replacement as part of the Hilltop Connector Trail. RR 4.8-1 requires compliance with existing regulations related to hazardous materials use, storage, disposal and transport. This would apply to the storage, disposal, and transport of hazardous materials such as mercury, asbestos, and lead-based paints that may be encountered during the demolition of existing asphalt and concrete-paved surfaces associated with construction of the project.

**Comment G5:**

5) Project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

**Response G5:** RR 4.8-1 requires compliance with existing regulations related to hazardous materials use, storage, disposal, and transport. This would apply to any contaminated soils that would be disturbed and would require storage, transport, and/or disposal. MM 4.8-1 states that contaminated soils may remain on site, provided clean fill material is placed over the contaminated soils. It also calls for compliance with proper disposal requirements for off-site disposal of contaminated or stockpiled soils. Construction specifications would require the use of import soils that are free of contamination.

**Comment G6:**

6) If the project area was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

**Response G6:** The Baldwin Hills area was not previously in agricultural use and the proposed trail would not pass through areas formerly or currently used for agriculture, livestock, or related activities.

**Comment G7:**

- 7) Human health and the environment of sensitive receptors should be protected during the field activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

**Response G7:** Construction activities for the proposed trail will be limited due to the type, size and number of construction equipment to be used, and trail use would not generate toxic emissions. Hazards from contaminated soils that are present in the area would be avoided and reduced through implementation of MM 4.8-1. No major health hazard is present on the proposed trail alignment nor will one be created by the trail project that may pose a risk to human health or the environment. Hazardous materials use will comply with existing regulations (RR 4.8-1). Compliance with other pertinent regulations (RRs 4.8-2 to 4.8-5) would avoid other hazards.

Public health and safety hazards associated with the adjacent oil and gas operations are addressed by various plans and programs that are being implemented by the oilfield operator, including compliance with County Fire Department and California Division of Oil, Gas, and Geothermal Resources (DOGGR) regulations; implementation of a Risk Management Plan, a Storm Water Pollution Prevention Plan (SWPPP); a Spill Prevention, Control and Countermeasure (SPCC) Plan; a Community Alert Notification System; an Emergency Response Plan; a Site Security Plan; an emergency shutdown system; a Pipeline Management Plan; and other measures to prevent hazards to persons at and near oil and gas operations. These measures would reduce hazards to adjacent land uses, including trail users.

A health risk assessment has been prepared for existing and future oil and gas operations, which states that cancer risk would be less than the South Coast Air Quality Management District (SCAQMD) threshold of ten excess cancer cases per million persons, with the implementation of mitigation (i.e., equipment types and receptor setbacks). The Baldwin Hills CSD also requires that the health risk assessment be updated every five years if meteorological data collected from the oil field activities during the past five years suggests that ongoing operations could result in significant changes to the health risk in the area.

Individuals who would use the Park to Playa Trail would only be spending a small percentage of an average 70-year life span on the trail. Thus, any exposure to hazardous materials (i.e., air toxics) in the area would be limited and unlikely to be a major factor in their overall cancer risk. Thus, no health risk assessment is necessary.

**Comment G8:**

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

**Response G8:** Wastes from trail use would be limited and trash receptacles are present at parks where the trail would pass and would be provided at the trailhead along the trail. For hazardous wastes disposal, RR 4.8-1 requires compliance with existing hazardous materials regulations, including the Toxic Substance Control Act, the Hazardous Material Transportation Act, the Resource Conservation and Recovery Act, the California Hazardous Waste Control Act, the Certified Unified Program Agency, and California Accidental Release Prevention Program. The project will comply with pertinent regulations.

**Comment G9:**

9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

**Response G9:** MM 4.8-1 requires DTSC concurrence for field oversight of grading operations in Segments C and H. The BHRCA shall include this MM in the contractor specifications, and the contractor shall comply with this MM during construction activities on Segments C and H.



**Comment Letter H: Plains Exploration and Production Company  
(February 15, 2013)**

**Comment H1:**

PXP reviewed the January 2013 Initial Study/Mitigated Negative Declaration (IS/MND). We have concluded that there is a fair argument that there will be significant environmental impacts, and an EIR should be prepared. Perhaps the most important defect is that the IS/MND repeatedly and incorrectly states that the Proposed Project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. This is not the case, and therefore, PXP requests that the Initial Study be revised so that it accurately describes the scope of the project and adequately discloses, analyzes, and classifies associated environmental impacts.

**Response H1:** The IS/MND analyzes the potential impacts of construction, use, and maintenance of the trail and concludes that significant adverse impacts would occur but compliance with existing regulations (as standard conditions) and the implementation of mitigation measures, as outlined in the IS/MND, would avoid and/or reduce these impacts to less than significant levels. Section 15063(c) of the CEQA Guidelines identifies one purpose of an Initial Study as enabling the Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration or Mitigated Negative Declaration. The comment does not indicate what significant environmental impacts under a fair argument would require preparation of an EIR. Because impacts from the Park to Playa Trail would be mitigated to less than significant levels, as indicated in the IS/MND, an EIR need not be prepared for the proposed project. Additionally, as explained further below, the trail alignment for Segment C, which is in the area addressed by the PXP comment, has been designated as preliminary and will be subjected to further design refinements and environmental review once those design refinements are completed.

The BHRCA has been in consultation and coordination with PXP during planning and design of the trail. Early on, the BHRCA and its consultants met with PXP representatives to inform them about the project and to obtain input. Specifically, on April 18, 2012, Karly Katona with the Los Angeles County Supervisor's office met with PXP representatives to discuss the project and the need for joint use agreements. On May 7, 2012, Ana Petric from the Mountains Recreation and Conservation Authority (MRCA); Oliver Seabolt from Alta Planning + Design; Karly Katona from the County; and Patrick Gorski and other PXP representatives did a site visit to the BHRCA property to discuss existing conditions; the proposed trail alignment; and the need to relocate the PXP's existing access road. This site walk occurred immediately after a sit-down meeting with multiple PXP representatives to discuss the project and the purpose of the site visit.

Based on these meetings and workshops held with various stakeholders, affected agencies, and adjacent property owners, the preliminary trail alignment was set as a proposed six-foot-wide natural surface trail in Segment C, and was designed to minimize impacts. This trail would also include the relocation of access roads serving oil and gas exploration,

production, processing, and associated activities and the provision of fencing to separate the trail from the oilfield activities, as stated on page 3-3 of the IS/MND. Under b) on page 4-59, the IS/MND also acknowledges that grading and excavation may disturb oil and gas pipelines in the area. RR 4.8-2 calls for notification of and coordination with the pipeline's owner/operator and their approval and monitoring of activities near the pipeline to avoid damage to the lines and to prevent the creation of hazards to the surrounding area. These impacts would be temporary during the construction phase.

In the long term, the proposed trail would not directly or permanently displace, prevent, preclude, or limit adjacent oil and gas exploration, production, processing, or associated activities in the Inglewood Oilfield. The oil and gas resources in the Inglewood Oilfield are being extracted from reservoirs located 800 to 10,000 feet below the ground surface. The property deed indicates that Lloyd Properties reserves the rights to all oil, gas, other hydrocarbons or minerals lying 500 feet or more below the surface of the property and has an easement over a drill site; an access easement to the drill site; and other pipeline and drainage easements. The easements are non-exclusive, and improvements can be made to the surface as long as they do not interfere with rights to extract mineral resources. The easements may also be moved if they interfere with BHRCA's use of the property.

The proposed trail would be a ground surface use, and construction of the natural surface trail would not go beyond ten feet below the ground surface. Thus, it will not affect underlying resources. Also, the trail does not introduce a land use that would expand the setback requirements for oil and gas operations in the area. Underlying mineral resources would continue to be available for extraction by PXP from the same locations that they are available without the proposed trail.

A meeting was held with oilfield property owners and operators on April 17, 2013, to discuss their concerns regarding the project. The BHRCA has committed to continue working with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C. When the alignment for the proposed trail in Segment C is set, it will be subject to additional environmental analysis and review.

Revisions have been made to the IS/MND to indicate that the proposed trail in Segment C is only a preliminary alignment, subject to further refinement and additional environmental review.

**Comment H2:**

The majority of the Inglewood Oil Field (IOF) is located in the Baldwin Hills unincorporated area of Los Angeles County, and a small portion of the field is within the jurisdiction of the City of Culver City – including the portion of the Proposed Park to Playa Trail Project referred to as “Segment C – the Blair Hills Corridor” (Segment C) in the IS/MND. The IOF has played an integral role in the history of oil production in the Los Angeles Basin and continues to be a steady source of domestic oil and natural gas. The IOF is the second most productive oil field in the entire Los Angeles Basin.

With technological advancements in the oil and gas industry, PXP’s professional engineers estimate that as much as 50% of the field’s oil resources remain in place in producing zones and can be readily accessed through drilling and production activities. These resources will continue to ensure the IOF supplies Southern California’s refineries with oil for decades to come, offsetting the need to import supplies from Venezuela and the Middle East.

The IS/MND indicates that Segment C is operated by the BHRCA. This is not the case. PXP is the operator of the IOF in accordance with vested rights to surface and sub-surface oil and gas exploration, production, processing and associated activities granted to PXP in accordance with 2001 property transfer agreements between Lloyd Properties and the BHRCA.

**Response H2:** While the discussion in Section 2.0 of the IS/MND does not state that Segment C is operated by the BHRCA, Table 2-1 lists the BHRCA as the owner and operator of Segment C since there is no current use on this BHRCA property. This does not refer to the BHRCA as the operator of the Inglewood Oilfield for any surface or subsurface oil and gas exploration, production, processing and associated activities. Also, the project does not propose any oil and gas exploration, production, processing and associated activity in the Inglewood Oilfield. To avoid this confusion, Table 2-1 on page 2-4 has been revised to replace the column heading “Operator” with “Management Entity”.

**Comment H3:**

The IS/MND also inaccurately describes Segment C of the Proposed Project as “open space,” and an “undeveloped area with past drilling operations.” This portion of the IOF is an active oilfield and has active oil and water injection wells along with facilities, such as a stormwater

basin and pipelines. PXP has voluntarily ceased drilling and re-drilling operations while the City of Culver City processes a new oil and gas ordinance, which would regulate such activities within the portion of the IOF in Culver City. Upon adoption of this ordinance, PXP will resume all oil and gas exploration, production, processing and associated activities in this area.

**Response H3:** References to open space are collectively made to areas where no urban development (i.e., buildings and roads) or land improvements are present or are planned and areas where no formal land uses have been assigned. Open space does not refer to adjacent oil and gas production areas or underlying oil, gas, or other mineral resources that may be subject to past or future

extraction. The term is also not meant to confer a permanent land use or designation to any area. Additionally, Segment C is zoned as “Open Space” and “Residential Single Family” on the Culver City Zoning Map.

Segment C only refers to the BHRCA properties where the proposed trail is planned to connect existing trails in the KHSRA and Baldwin Hills Scenic Overlook. There are oil/gas wells, dirt roads, fences, a retention basin, a drainage channel, a storm drain inlet, and utility poles on this property, but no ongoing activity occurs on these parcels. The discussion of Segment C does not include oil and gas exploration, production, processing and associated activities on adjacent parcels. Since PXP has ceased drilling operations in Culver City (where Segment C is located), this is consistent with the description of past drilling operations in Segment C. The IS/MND does not discuss the future oil and gas drilling activities of the PXP, as these are not part of the project. Also, the preliminary trail alignment in Segment C was located away from the two existing well sites on the western section of Segment C, so as not to impede future drilling activities.



**Comment H4:**

As mentioned above, the IS/MND repeatedly states that the proposed project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. This is not true for two reasons:

First, the bottom hole locations of wells that PXP has rights to drill and operate in this area must be within a certain distance from the surface hole locations of the well in order for the well to be reasonably feasible to drill. This distance is unique to each well and is based upon individual characteristics of the target reservoir, maximum well angles, avoidance of underground facilities and other considerations. Potential bottom hole locations for future oil field development in this area require the use of at least three existing pads in this area. One of these pads is within 50 feet of the proposed trail (just south of the abandoned school) on the parcel immediately south of the property referenced as Segment C and the other two pads are both less than 300 feet from the proposed trail. One of these two pads is located on the property referenced as Segment C and the other is located on the parcel immediately south of it.

Existing regulations prevent the location of new production wells within 300 feet of areas of "public assembly," which the proposed trail could potentially be defined as. General safety considerations relative to the proposed proximity of the oilfield operations and a newly established publicly traveled thoroughfare must also be examined. Therefore, the proposed project would adversely impact IOF oil and gas production, processing and associated activities as well as affect the availability of underlying oil and gas resources on the subject property as well as adjacent properties.

Such an impact is significant as it would result in the stranding, or arguably taking, of a known mineral resource that would be of value to the region, the owners of the mineral rights, and the residents of the state. This impact needs to be appropriately analyzed, classified, and mitigated. Avoidance of this impact would occur by relocating the trail through the abandoned school site, which is designated and zoned for a public/park use, rather than through the existing and active oil field.

**Response H4:** The preliminary plans for a proposed natural surface trail in Segment C would not involve the construction of habitable structures or the creation of impervious surfaces that would prevent PXP from drilling future wells. The proposed trail would not impact the future use of the three existing oil pads mentioned. While the trail would go through a drill site located east of the abandoned school site, the drill site is located within the required setback areas established by Culver City and DOGGR regulations. Thus, it is unlikely that future oil and gas drilling would occur in this area.

The BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C. As previously noted herein, when the alignment for the proposed trail in Segment C is set, it will be subject to additional environmental analysis and review.



Segment C is zoned as “Open Space” and “Residential Single Family” on the Culver City Zoning Map. Existing and proposed regulations unrelated to BHRCA would limit oil drilling in Segment C, not the proposed trail. Specifically, Chapter 11.12 of the Culver City Municipal Code outlines the City’s requirements for obtaining an oil, gas or hydrocarbon well permit and for operating such well. The City’s existing regulations allow the drilling of only one well or well hole for every five full acres for each oil-producing zone in the operating unit. Chapter 11.12.105 prohibits a well hole within 300 feet of any major public street, sidewalk, or highway; within 100 feet of the outer boundary of the parcel of land; within 100 feet of any steam boiler building or source of ignition; and within 300 feet of any school buildings or other places of public assemblage. These regulations do not state that a trail is considered a place of public assembly. Rather, Chapter 17.7 specifically defines assembly as permanent structures for clubs, lodges, private meeting halls, and places of worship. A public park could also be considered a place of public assembly.

The preliminary alignment of the proposed trail would be located within 100 feet of the northern property line at the eastern section of Segment C. (The alignment crosses a detention basin in the western section of Segment C.) As such, the proposed trail would only be located in this eastern section where oil wells are currently not permitted.

And while the school has been closed, the BHRCA is considering plans to develop a park at the school site. Thus, the 300-foot setback required for well locations from school buildings and places of public assemblage remains in place.

The proposed trail is not considered a major public street, sidewalk or highway. Chapter 9.08 defines a street to include all streets, parkways, highways, avenues, lanes, alleys, courts, places, squares, curbs, or other public ways in the City which have been or may later be dedicated and opened for public use. Chapter 17.7 defines a street as “a public thoroughfare accepted by the City, which affords principal means of access to abutting property, including an avenue, place, way, drive, lane, boulevard, highway, road, and any other thoroughfare, except an alley” as defined in the Zoning Code.

The City of Culver City is currently working on revisions to existing City regulations relating to oil and gas operations, and a draft document was circulated for public review on April 9, 2013. The proposed regulations prohibit the construction of major facilities (i.e., refineries, tank farms, fractionation, absorption plants, gas plants, and other plants and processing facilities) within Culver City. Only new production and injection wells and associated equipment (i.e., tanks, pipes, and piping components) are allowed. Tanks are not allowed closer than 500 feet from a developed area (i.e., a parcel developed with a residential, recreational, institutional, commercial, industrial, or office structure) or within 200 feet of a public road. Drilling and re-drilling activities must be set back at least 400 feet from developed areas and 75 feet from public roads. Existing wells within the required setbacks must be scheduled for abandonment. The proposed regulations also call for slant drilling to locate the top hole of wells as far away from any sensitive developed area (a parcel with a residence, park, school, or

health care facility). Wells with top holes within 800 feet of a sensitive developed area require a supplement to the annual drilling plan.

The City's proposed regulations increase the setback from school buildings and places of public assemblage from 300 feet to 400 feet and decrease the setback from public roads from 300 feet to 75 feet. Also, the 100-foot setback from the outer boundaries of a parcel will be removed. However, the 400-foot setback will apply to parcels developed with a residential, recreational, institutional, commercial, industrial, or office structures. The proposed regulations do not set standards related to hiking trails, and the proposed Park to Playa Trail would not expand the setback areas that will be established by the regulations.

The Baldwin Hills CSD was adopted by the County to regulate oil and gas operations in the Inglewood Oilfield. The CSD contains standards that require drilling and redrilling setbacks that are at least 400 feet from developed areas and at least 20 feet from any public roadway. A developed area is defined as a lot or parcel with a residential, commercial, industrial, or office structure; a public park, a house of worship, a cemetery, a school, a parking lot, or a recreation area developed and opened for public use.

The Baldwin Hills CSD is located in unincorporated County land, and the existing residences and abandoned school in the Blair Hills area of Culver City (which would be considered a developed area under the CSD) are located approximately 600 to 1,300 feet north of the County line. Thus, the CSD standards would not be applicable to drilling and redrilling activities in Culver City. Also, the proposed project would not create a public roadway and the trail along the La Cienega ramp would be over 150 feet from the County line. While the trail may be considered a recreation area, the proposed trail in Segment C would be over 450 feet from the County line at its nearest point. Thus, the proposed project would not affect PXP compliance with the CSD standards.

The Settlement Agreement for the CSD requires PXP to provide a supplement to its annual drilling plan for deep zone and mid-zone wells that are slant-drilled within 800 feet of a sensitive developed area (e.g., a single-family or multi-family residence, an existing park, a school, or a health care facility) and provides an incentive to abandon wells located within 800 feet of these areas. It calls for shallow wells to be located away from developed areas. The Settlement Agreement also states that the developed area that is used to establish the 400-foot setback for drilling and redrilling shall remain unchanged from the effective date of the CSD (i.e., October 2008). Like the CSD, the Settlement Agreement only relates to the unincorporated County lands.

Thus, the proposed project would not create a sensitive developed area that would restrict the location of existing and future slant-drilling activities. The proposed trail would also not expand the developed area as defined in the CSD or limit the area where drilling and redrilling activities may occur.

The *California Code of Regulations* (Title 14, Division 2, Chapter 4) outlines the regulations for the development, regulation, and conservation of oil and gas resources, as implemented by the Department of Conservation. It defines

a critical well as one located within 300 feet of a habitable building or airport runway or a well within 100 feet of a public street, railway, navigable water body, public recreational facility, such as a golf course, amusement park, picnic ground, campground, or any area with periodic high density population or a wildlife preserve. Critical wells are required to have well safety devices and blowout prevention equipment. An environmentally sensitive production facility includes an oilfield facility located within 300 feet of any public recreational area or a habitable building, such as residences, schools, hospitals, and businesses. Regulations for the testing and inspection of these facilities have been established. An urban area is also defined as an area of at least 25 business establishments and/or residences, with its perimeter designated as 300 feet beyond the outer limits of the outermost structures, where production facilities are subject to specific regulations.

The proposed trail is not listed as an example of a public recreational facility and is not expected to have a periodic high density population. Thus, the preliminary trail alignment in Segment C would not lead to the designation of an existing well as a critical well or the designation of an existing facility as an environmentally sensitive facility.

Also, Chapter 11.12 of the Culver City Municipal Code already prohibits oil wells within 300 feet of any major public street, sidewalk or highway; within 100 feet of the outer boundary of the parcel of land; and within 300 feet of any school buildings or other places of public assemblage. Thus, it is unlikely that a future (critical and environmentally sensitive production) well would be drilled within the existing setback area in Segment C.

The preliminary alignment of the proposed trail in Segment C would not extend the limits of the urban area, as defined by the *California Code of Regulations*, and thus would not impose additional regulations on existing and future oil and gas operations.

The State Oil and Gas Supervisor has also established field rules for drilling within specific zones of the Inglewood Oilfield. The proposed trail would not affect these rules or the drilling activities they regulate.

Policy 27.F in the Culver City General Plan calls for a feasibility study and a Focused Special Study for the Southeastern Subarea (Blair Hills/Baldwin Hills area). Biological resources and cultural resources in the areas where the trail alignment would be located in Culver City have been evaluated in the technical studies provided as appendices to the IS/MND and are summarized in the IS/MND. The appropriate range of uses, geologic conditions to support uses, and vehicle access locations were not evaluated since no urban development is planned for the BHRCA property (Segment C) at the northern edge of the Southeastern Subarea. The proposed trail in this area would instead preserve scenic views and retain the BHRCA property as open space. No conflict with this policy would be created by the project.

As stated, the preliminary alignment of the proposed trail in Segment C would be separated from oil and gas operations by a new fence that would prevent entry from the proposed trail into the adjacent oil and gas operations. Trail users will not be involved in oil and gas operations and will not obstruct these operations at nearby areas. Trail users will also not directly utilize oil and gas

resources from the Inglewood Oilfield. The proposed natural surface trail in Segment C would not utilize a known mineral resource that is of value to the State, the region, or the owners of these mineral resources, and it would not impact PXP's ability to drill on BHRCA land. The BHRCA has no interest in taking anyone's rights to mineral resources. The BHRCA has also made repeated attempts and will continue to work with PXP on the location of the proposed trail alignment.

As stated in Section 2.3.3 (page 2-5) of the IS/MND, the abandoned school site has recently been acquired by the BHRCA, but is not part of the project. The preliminary trail alignment in Segment C of the Park to Playa Trail is not proposed through the school site due to elevational changes that would make trail use difficult and due to resident opposition. Any future use of this parcel would be determined after consideration of various design, environmental, and other factors, such as neighborhood needs and concerns.

**Comment H5:**

Second, the proposed trail location on the IOF at Segment C Blair Hills Corridor encroaches into a stormwater basin and an associated storm drain easement. The basin is included in PXP's National Pollutant Discharge Elimination System (NPDES) permit for the entirety of the IOF, and functionality of the basin in accordance with this permit is essential for operations of the IOF. Any proposed encroachment upon or adjacent to this basin would require adherence to the IOF's NPDES permit and would require RWQCB approval. The basin and easement are not adequately described in the IS/MND or mapped (Exhibit 2-6) and, as such, associated impacts are not adequately disclosed, analyzed, classified and mitigated. To lessen or avoid these impacts, the trail must be reconfigured.

**Response H5:** The preliminary alignment of the proposed trail in Segment C would cut through the detention basin at the western section of this segment. The detention basin at the western section serves the Baldwin Hills Scenic Overlook and the natural surface trail proposed in this basin would not significantly affect the capacity or function of the basin.

At the eastern section, the preliminary alignment of the trail would go over the underground storm drain at the northeastern end of Segment C, away from the Lloyd Basin, channel, and inlet. The PXP's National Pollutant Discharge Elimination System (NPDES) permit indicates that there are six retention basins within the Inglewood Oilfield boundaries that intercept storm water and would prevent oil spills from reaching the Los Angeles County storm drain system and surface water by allowing oil to accumulate on the surface and discharging clean water from underneath. The Lloyd Basin is identified as Discharge Point No. 2 and drains into the Ballona Creek and the Ballona Estuary. The NPDES permit does not discuss or impose conditions on the drainage channel or storm drain inlet (within Segment C) located downstream of the Lloyd Basin.

Effluent and sediment limitations for various pollutants have been set for Discharge Point No. 2. Surface water limitations for Ballona Creek have also been included in the permit. The PXP will be submitting and implementing a



Storm Water Pollution Prevention Plan (SWPPP), a Best Management Practices Plan, and a Spill Prevention Control and Countermeasure Plan to comply with the provisions of the permit. However, the permit and associated provisions do not apply to the Park to Playa Trail.

Under existing conditions, runoff from the KHSRA enters the Lloyd Basin, and runoff from Segment C goes into the drainage channel. Section 4.9 (pages 4-67 to 4-74) of the IS/MND analyzes the potential impacts on hydrology and water quality from the Park to Playa Trail. As discussed in RR 4.9-1, an SWPPP would be prepared and implemented for the project to reduce pollutants in the runoff during construction activities. Trail use and maintenance activities would also comply with RR 4.9-2, which outlines the storm water regulations of the Cities of Los Angeles and Culver City and the County of Los Angeles. The analysis indicates that, with compliance with existing regulations, the project would not result in significant adverse impacts related to hydrology and water quality.

No improvements to the Lloyd Basin (located south of the eastern section of Segment C) are proposed, as this basin is located outside Segment C, although the proposed trail along the La Cienega ramp would pass near the northeastern corner of the basin but would not be located on the parcel occupied by the basin. Native plant revegetation is no longer proposed within the drainage channel downstream of the Lloyd Basin (see revised Exhibit 3-3). Also, no changes to the storm drain inlet are proposed. Thus, no changes to the capacities and functions of the Lloyd Basin, drainage channel, or storm drain inlet would occur. Indirect changes to the drainage channel would include decreases in flows in the channel and an increase in the treatment of runoff entering the channel due to the introduction of native plants and revegetation near the channel (in Segment C). Also, the proposed vegetated swale in the KHSRA's Segment E would remove pollutants in the runoff entering Gwen Moore Lake, which has overflows going into the Lloyd Basin. These project features would result in beneficial impacts to water quality.

Exhibit 2-6 is an aerial photograph of Segment C and was not provided to identify easements and individual facilities outside of Segment C. While there are easements on the BHRCA property, the property deed states that these easements are non-exclusive and can be moved if they interfere with BHRCA's use of the property.

A meeting was held on October 19, 2012, to discuss the project and Regional Water Quality Control Board (RWQCB) permits for proposed improvements in Segment C was held with the following people in attendance: Karly Katona of the Los Angeles County Supervisor's Office; Ana Petrlc of the MRCA, Emily Duchon of Alta Planning + Design; and Jau Ren Chen, Cassandra Owens, Sean Lee, Deb Smith, and Sam Unger of the RWQCB. The RWQCB staff indicated that the drainage basin (Lloyd Basin) and channel are subject to a RWQCB permit and that PXP monitors discharges from the basin; implements various Best Management Practices (BMPs); and will get a new NPDES Permit in February 2013. The RWQCB supports the habitat restoration goals of the project and indicated that grants may be available for the project's storm water improvements. The RWQCB also indicated that a General Construction Permit to comply with Section 401 of the Clean Water

Act would be needed for the Park to Playa Trail, but a Water Quality Certification (Section 401 permit) would not be required. They also stated that a barrier should be installed between the trail and culvert/drainage structure to keep trail users away from the culvert.

The revegetation of the drainage channel in Segment C is no longer proposed (see Exhibit 3-3) and thus, disturbance that may occur with revegetation would be avoided. Also, a fence would be provided along the trail to separate it from the dirt access road, the storm drain inlet, the drainage channel, and nearby oil and gas operations. However, please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments, and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, and stakeholders to address their concerns as the trail design for this segment is finalized.

**Comment H6:**

Further, the IS/MND proposes a large area within the IOF at Segment C for revegetation. Much of this re-vegetation is proposed within the aforementioned basin. The basin cannot be vegetated

without compromising the functionality of the basin, and hence, operations of the IOF as a whole. Additionally, the amount of revegetation proposed in Segment C is inconsistent with the replacement ratio of 1:1 identified within MM 4.4-1 as the amount being vegetated in Segment C is far more than what is proposed for removal. MM 4.4-1 also states that "any habitat proposed for preservation in order to meet the 1:1 criterion shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA." Such a requirement would be of a breach of the oil and gas agreements between BHRCA and PXP as discussed above; therefore, this must be removed.

**Response H6:** In preliminary plans, no revegetation is proposed in the Lloyd Basin. Exhibit 3-3 has also been revised to remove the proposed revegetation located in the drainage channel that extends from the Lloyd Basin to the storm drain inlet. Thus, no direct impacts to the use and function of the basin or channel will occur. However, the BHRCA will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C.

MM 4.4-1 states that California Sagebrush-California Buckwheat Scrub shall be "preserved or restored either on-site or at a suitable off-site location at a ratio no less than 1:1". Segment C (as shown in revised Exhibit 3-3) is not the only area proposed for revegetation. Exhibits 3-4 through 3-9 show other areas proposed for revegetation. Also, the term "preserve in perpetuity" is included in the mitigation measure because temporary habitat replacement is not considered adequate to mitigate potential impacts.

The BHRCA owns the surface rights to the property up to 500 feet below the surface, with Lloyd Properties reserving rights to all oil, gas, other hydrocarbon substances, and all minerals lying below a depth of 500 feet

from the surface, as well as drill site, access, pipeline, and utility easements. Thus, the revegetation and landscaping on the ground surface are allowed in Segment C.

Culver City's existing regulations (Chapter 11.12.105 of its Municipal Code) prohibit a well hole within 300 feet of any major public street, sidewalk, or highway. Thus, no wells can be drilled in or near the drainage channel, as it is located within 150 feet of La Cienega Boulevard. Areas proposed for revegetation in Segment C are located within City of Culver City-required setbacks, except for revegetation of disturbance areas south and southeast of the relocated dirt road.

Culver City's proposed oil drilling regulations, if approved, will establish a 400-foot setback from parcels developed with a residential, recreational, institutional, commercial, industrial, or office structure and a 75-foot setback from public roads. The proposed revegetation areas are within these setback areas. Thus, there are areas in Segment C where revegetation that would have to be preserved in perpetuity would not obstruct future oil and gas drilling operations.

**Comment H7:**

1. This document refers to the entire project area as "open space." The area referred to as "Segment C - Blair Hills Corridor Trail" is not open space. It is an active, oil field. Update text accordingly. Examples of where this occurs:
  - Page 1-1, Section 1.1, second paragraph
  - Page 2-1 Section 2.1
  - Page 2-2, Section 2.2, last paragraph
  - Page 2-3, Section 2.3, third paragraph
  - Page 3-1, Section 3.1, 1st bullet
  - Page 4-61, h) 2nd paragraph
  - Exhibit 4-17
  - Page 4-78, 1st paragraph
  - Page 4-90, Nearby Residences
  - Page 4-97, Recreational Plans

**Response H7:** The IS/MND refers to the trail alignment going through public parks and open space areas or public parks, open space areas, and undeveloped land. References to open space are made for areas where no urban development (i.e., buildings and roads) or land improvements are present or planned and areas where no formal land uses have been assigned. It does not refer to adjacent oil and gas production areas or the underlying oil, gas, or other mineral resources in an area that may have been subject to past extraction or will be subject to future extraction. The term "open space" is also not meant to confer a permanent land use or designation to any area. See Response H3.

Exhibit 4-17 is a copy of an exhibit from the KHSRA General Plan Amendment and does not identify any area as open space. The first paragraph under Recreational Plans on page 4-97 is a summary of the Baldwin Hills Master Plan, which talks about open space in the Baldwin Hills area.

**Comment H8:**

2. Correct the description of the oilfield use from "oil and gas production" to "oil and gas exploration, production, processing and associated activities." Examples of where this change is to occur:
- Page 2-3, Section 2.3, 2nd paragraph
  - Page 2-3, Section 2.3.1, 3rd paragraph
  - Page 2-5, Section 2.3.2, 2nd paragraph
  - Page 4-4, Section 4.1.1 Page 4-82, Section 4.12.1 - Oil Resources

**Response H8:** This change has been made throughout the IS/MND.

**Comment H9:**

3. The document lacks any formal, cumulative impact analysis. Include.

**Response H9:** Section 4.19 b) on page 4-113 identifies a number of other projects planned or proposed near the trail alignment. It acknowledges that the environmental impacts of these projects would add to the impacts of the proposed Park to Playa Trail on a cumulative basis. However, the impacts of the proposed project would be limited in both intensity and scope due to the relatively small size, scattered locations, and type of trail improvements proposed along its approximately 7.0-mile stretch.

Section 15064(h)(4) of the CEQA Guidelines states that "the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable". Since the proposed project's impacts on individual issue areas would be less than significant after mitigation, these impacts are not expected to result in cumulatively considerable impacts when added to the impacts of other projects planned or proposed in the vicinity of the trail alignment. The cumulative impacts of the project would be less than significant.



**Comment H10:**

4. The IS/MND incorrectly describes the presence of groundwater in the LA Basin, and in particular, the Baldwin Hills. The geology of the Baldwin Hills constrains the occurrence and movement of groundwater, as described in the USGS groundwater model of the LA Basin (USGS 2003), the California Department of Water Resources groundwater assessment of the LA Basin (DWR 1961), and studies specific to the IOF.

The USGS excludes the Baldwin Hills from the model domain, separating it by a no-flow boundary. The no-flow boundary condition means that groundwater neither flows in to or out of the Baldwin Hills; it is isolated from the remainder of the LA groundwater basin. In the definitive account of the groundwater geology of the LA Basin, the Department of Water Resources concludes that “the Baldwin Hills form a complete barrier to groundwater movement, where the essentially non-water bearing Pico Formation crops out (DWR 1961).”

The results of the extensive, peer reviewed, site specific study of the Baldwin Hills, including a groundwater monitoring array that traverses the entire zone of potential fresh water, are in complete agreement with the finding of the USGS and DWR. All of the oil producing zones of the IOF (below 500 feet) contain water too saline for direct use at the surface, as is the case in all parts of the world - water at greater depths is saline, not drinkable, and sometimes referred to as formation water. The USEPA makes this distinction in the Safe Drinking Water Act. Only the upper 500 feet, above the top of the Pico Formation, has any fresh water, albeit limited in extent and yield.

In most of the LA Basin, the base of the fresh water zone is defined by the Pico Formation. Overlying the Pico Formation are the aquifer systems in the LA Basin located away from the Baldwin Hills: the Inglewood Formation, the Silverado Formation, and the Lakewood Formation. In many parts of the LA Basin, these formations are aquifers for water supply wells. These formations became folded and faulted in the geological uplift of the Baldwin Hills, and are in fact exposed at the surface. Their disruption by the uplift of the Baldwin Hills has disconnected them from the groundwater-bearing formations of the LA Basin (USGS 2003, DWR 1961).

Update accordingly; examples of where text requires updating are on pages 4-56, 4-68, and 4-70(b).

**Response H10:** On page 4-57 of the IS/MND, the statement in the third paragraph under Oil Drilling Operations that says “perched water is found at 50 feet below the ground surface and over 200 feet below the ground surface for the Silverado Aquifer” is consistent with the discussion in the Baldwin Hills CSD EIR (pages 2-31 and 4.6-4). The location of the Silverado Aquifer has been defined on page 4-57 of the IS/MND as located “north and northwest of the Baldwin Hills”. The information on Groundwater on page 4-69 came from the Metropolitan Water District’s (MWD’s) Groundwater Assessment Study and does not talk about groundwater movement. The word “overlie” has been replaced with “is located at the boundaries of three groundwater basins



within". The end of the second sentence in the first paragraph under the Groundwater discussion on page 4-69 of the IS/MND has also been revised to read: "... have restricted groundwater movement between the basins".

The third sentence in the second paragraph under the Groundwater discussion (page 4-69 of the IS/MND) has also been revised to define the location of the Silverado aquifer as "located north and northwest of the Baldwin Hills". The first sentence under b) on page 4-71 has been revised to replace the word "overlies" with "is located at the boundaries of".

#### Comment H11:

5. The document states that no long-term adverse changes/impacts in stormwater runoff quality would occur with the proposed project. However, stormwater runoff from the operational phase of the Proposed Project that enters the stormwater basin on the IOF could adversely affect the water quality of the basin due to trail use by humans and pets. Such changes constitute an environmental impact, and require appropriate analysis and mitigation in the environmental document for this project. Examples of where this update needs to occur follow:

- 4-63 (RR 4.0)
- 4-68 (a,f)
- 4-69 (2nd paragraph)
- 4-71 (1st/2nd paragraphs)
- 4-71 (g,h)
- 4-72 (j)
- 4-73 (RR 4.9-1)

**Response H11:** Section 4.9 of the IS/MND discusses potential storm water impacts. The compaction of the existing ground to create a natural surface trail that is proposed in Segment C would not introduce new pollutants in the runoff. Revegetation in this area would add native coastal scrub plants similar to those that are now present in the surrounding area. Also, storm water from the proposed trail in Segment C is not expected to drain into the Lloyd Basin, but will be directed into the drainage channel downstream of the basin. Runoff from existing trails in the KHSRA will continue to flow into Gwen Moore Lake, which eventually drains into the Lloyd Basin.

RR 4.9-1 summarizes the requirements under the NPDES Construction General Permit and does not address operational storm water runoff. Similarly, the discussion under a, f) on page 4-69 discusses potential construction impacts on storm water and the NPDES Construction General Permit and does not address operational storm water runoff.

Operational impacts are discussed on page 4-70. The second paragraph on page 4-70 states that no wastewater would be generated by the trail improvements and the pervious surface at the proposed parking lot would not lead to pollutants from parked vehicles running off the site or entering the storm drain system. The third paragraph on page 4-70 discusses solid wastes (including pet wastes) that would be placed in trash receptacles.

Revegetation would also have a secondary function of removing pollutants from the runoff in Segments C and E.

Pollutants from trail use may include wastes from hikers, bicyclists, and dogs that would use the trails. Revegetation areas proposed in Segment C between the trail and the drainage channel would reduce erosion and help remove sediments, loose soils, and pollutants from the runoff.

Runoff from the proposed trail along the La Cienega ramp that would pass near the drainage channel and Lloyd Basin would percolate into the trail or into adjacent slope areas. Existing vegetation on the slopes are also expected to help remove sediments, loose soils, and pollutants from trail runoff before it enters the channel. Thus, pollutants from these new trails would not affect water quality in the Lloyd Basin and, while they may affect water quality at the channel, vegetation present between the trail and the channel would remove pollutants and could improve storm water quality. Also, the NPDES permit for the oilfield operations does not require monitoring of water quality at this channel.

The proposed vegetated swale in Segment E would also remove pollutants in the runoff from the KHSRA, which is currently directed into Gwen Moore Lake, where overflows subsequently enter the Lloyd Basin. The existing trails in the KHSRA would generate the same runoff and associated pollutants, with improvements in water quality due to the proposed vegetated swale. In addition, there are several other landscaped areas between the trails in the KHSRA and the Lloyd Basin that afford opportunities for runoff pollutant removal. Thus, no adverse impact to water quality in the Lloyd Basin is expected with the project.

As discussed on page 4-70 of the IS/MND, the County of Los Angeles and the Cities of Los Angeles and Culver City have storm water regulations that prohibit pollutants from entering the storm drain system. Compliance with these regulations would reduce potential water quality impacts from long-term use of the Park to Playa Trail to a less than significant level.

The discussion under c, d, e) on pages 4-71 to 4-72 addresses drainage patterns and not storm water quality. The fifth paragraph under g, h) on page 4-72 discusses flood hazards. The discussion under j) on page 4-73 relates to seiche, tsunami, and mudflow hazards. RR 4.9-1 on pages 4-73 and 4-74 summarizes requirements under the NPDES Construction General Permit that the project would need to implement.

**Comment H12:**

6. The document does not disclose the Lead Agency's thresholds of significance for environmental impact classification. These thresholds need to be clearly disclosed and the environmental impact analysis in the document must compare and measure project impacts to these thresholds to provide adequate environmental impact analysis in accordance with CEQA.

**Response H12:** While Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish thresholds of significance for use in determining the significance of an environmental impact, the BHRCA has not adopted thresholds of significance. Thus, the checklist questions in Appendix G of the CEQA Guidelines are used as significance criteria in the analysis in the IS/MND.

**Comment H13:**

7. The operator of the Blair Hills Corridor property is Plains Exploration and Production Company (PXP) - not BHRCA. The 2001 deed from Lloyd Properties to BHRCA states the property is subject to the existing oil and gas agreements among other items identified in that Deed (Document No. 2001-2415029). Further the aforementioned Deed contains a drill site and associated easement reservation for future drilling operation.

Additionally, the proposed trail passes through a slope, future street, Public Utility, access, and pipeline easements. Descriptions of these easements and any associated impacts resulting from encroachment into these easements needs disclosure, environmental analysis, impact classification and mitigation.

**Response H13:** See Response H2 regarding the identification of the BHRCA as the operator of Segment C. While the preliminary alignment for the proposed trail would go through the drill site and access easements, the drill site is located within the required setback areas established by Culver City and DOGGR regulations. Also, the property deed states that an easement can be moved by either Lloyd Properties or BHRCA if it is adversely affecting current or future uses of the property.

The preliminary alignment of the proposed trail in Segment C would run along the western edge of the right-of-way of the southbound off-ramp on La Cienega Boulevard and would not be located on the slopes of private property in this area.

The BHRCA and the County studied the feasibility of a street through Segment C (connecting the abandoned school site to La Cienega Boulevard), but this street was deemed to be infeasible. No future street is planned through Segment C.

As discussed on page 4-59 of the IS/MND, the preliminary alignment of the proposed trail would go over underground lines and existing easements in Segments C, F, and G, but would not interfere with underlying utility lines or the primary purpose and use of the easements (i.e., access to the underlying or overhead lines), as only a natural surface trail is proposed. The relocated access dirt road and proposed native plant revegetation in Segment C would also not interfere with underlying pipelines. The proposed trail, dirt road, revegetation, security fencing, interpretive node, and other trail improvements would be constructed to avoid impacts to underlying pipelines, as stated under RR 4.8-2.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments, and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment H14:**

Further, the IS/MND repeatedly refers to the property that Segment C of the proposed trail goes through as an “undeveloped area with past drilling operations.” This is not the case. PXP has voluntarily ceased the drilling or redrilling of wells in this portion of the IOF as a courtesy to the City of Culver City while they draft a new oil and gas ordinance to govern such operations in this

location. This portion of the oilfield still has active oil and water injection wells along with facilities, such as a stormwater basin and pipelines, and upon Culver City's adoption of the aforementioned oil and gas ordinance, PXP will resume all activities associated with oil and gas production/processing on this property. Examples of where text to be changed to reflect this follow:

- Page 2-4, Table 2-1
- Page 2-5, Section 2.3.3
- Page 4-4, Segment C
- Page 4-56, 4th paragraph of "Oil Drilling Operations"
- Page 4-77, a, b
- Page 4-82 (a)

**Response H14:** See Response H2. In Table 2-1, the column heading “Operator” has been changed to “Management Entity”. There is no mention of an operator for Segment C in Section 2.3.3 or under Segment C on page 4-5. Since PXP has ceased drilling operations in Culver City, this is consistent with the description of past drilling operations in Segment C. The discussions on page 4-77 under a) and b) and on page 4-82 under a) refer to Segment C as an undeveloped area and undeveloped land due to the lack of buildings, improvements, or a specific land use.



**Comment H15:**

8. The proposed trail location at Segment C Blair Hills Corridor crosses a RWQCB permitted/required stormwater basin and stormdrain easement. The flood control basin and easement are not adequately described in the IS/MND or mapped (Exhibit 2-6) and associated impacts are not adequately disclosed, analyzed, classified and mitigated.

The basin is approximately 1.3 acres. Stormwater from portions of the oilfield on both the northeast and northwest sides of La Cienega as well as stormwater and overflow water from the lake at KHSRA drains into the basin. A map depicting the boundary of this stormwater basin is included as Exhibit 1 to this Attachment. The basin is included in PXP's NPDES permit for the Inglewood Oil Field, and functionality of the basin in accordance with this permit is essential for operations of the field and the proposed trail encroaches upon the path of the natural drainage.

The trail as currently proposed encroaches into the basin, and hence, the trail as proposed would be subjected to periodic flooding in this area during rainy seasons. Such flooding poses safety and water quality impacts. To lessen or avoid these impacts, the trail must be reconfigured.

Examples of where descriptions, analysis, and impacts need updating are Exhibit 2-6, Page 2-5, Page 4-30(b), Table 4-8, Page 4-30, Page 4-37 (b and MM 4.4-6), Page 4-56 and Page 4-61 (h).

**Response H15:** The preliminary alignment of the proposed trail in Segment C would go through the detention basin as a natural surface trail at the western section of Segment C. At the eastern section, the natural surface trail would pass over the underground storm drain located north of the Lloyd Basin, a drainage channel, and a storm drain inlet. Only native plant revegetation is proposed in the area near, but not in, the drainage channel. The proposed trail along the La Cienega ramp would only pass near the northeastern corner of the Lloyd Basin, but would not be located on the parcel occupied by the basin. See Response H5.

As indicated, no improvements are proposed in the Lloyd Basin in preliminary plans. The preliminary proposal is a new trail that would be a six-foot-wide natural surface trail and—together with the relocated dirt road, revegetation, and fencing—would not obstruct runoff flows in the eastern section of Segment C. The interpretive node would redirect storm water into nearby adjacent areas for percolation. While compaction of the existing soils on the surface of the trail and relocated dirt road may reduce ground percolation, the presence of adjacent uncompacted soils, the sizes of the natural surface trail and relocated dirt access road, their at-grade elevation, and the absence of impervious surfaces would result in minor, localized changes in drainage.



The preliminary alignment of the trail will encroach into the detention basin at the western section of Segment C and the basin would be subject to periodic flooding. As stated on page 4-73 of the IS/MND, trail users can readily leave the trail during major storms and can stay out of areas where debris flows and mudflows are occurring.

Under b) on pages 4-31 through 4-33, potential impacts to the detention basin on the western section of Segment C, the Lloyd Basin, the drainage channel in the eastern section of Segment C, and other drainages in the KHSRA are discussed. Table 4-8 lists jurisdictional features and identifies the detention basin in the western section of Segment C, the Lloyd Basin, and the drainage channel downstream of the Lloyd Basin as jurisdictional features. No disturbance to the Lloyd Basin will occur since this basin is located outside Segment C. Revegetation in the drainage channel is no longer proposed. MM 4.4-6 requires the BHRCA to obtain any necessary regulatory permit authorizations for impacts to the detention basin at the western section of Segment C and for impacts to the drainage channel at the eastern section in order to ensure no significant adverse impacts to wetlands, riparian communities, and other jurisdictional resources occur. Page 4-57 discusses hazards from oil and gas operations, including drainage runoff into the Lloyd Basin. Under h) on page 4-62, hazards to trail users from the Lloyd Basin are discussed.

**Comment H16:**

9. Page 2-3: f, g) Impacts from waste generated from potential petroleum impacted soil were not evaluated. This needs to be included, classified and mitigated.

**Response H16:** Petroleum-impacted soils are addressed in Section 4.8 of the IS/MND, with RR 4.8-1 requiring compliance with existing hazardous materials regulations for use, storage, disposal and transport. These regulations include the Toxic Substance Control Act, the Hazardous Material Transportation Act, the Resource Conservation and Recovery Act (RCRA), the California Hazardous Waste Control Act, the Certified Unified Program Agency, and the California Accidental Release Prevention Program. The Hazardous Materials Transportation Act provides regulatory and enforcement authority to the Secretary of Transportation to reduce risks to life and property from hazards associated with the transport of hazardous materials. The RCRA serves as the basis for the proper management of hazardous and nonhazardous solid wastes. In addition, MM 4.8-1 outlines soil management practices for contaminated soils that may be encountered during trail construction and use in Segments C and H. A sentence has been added at the start of the 4<sup>th</sup> paragraph on page 4-110 to state “The handling of hazardous wastes and contaminated soils is addressed in Section 3.8, Hazards and Hazardous Materials”.

**Comment H17:**

10. Exhibit 4-3: "Existing Views of Segment C" No views identified as IOF.

**Response H17:** Exhibit 4-3, Existing Views of Segment C, shows views of the preliminary trail alignment and does not focus on nearby oil and gas drilling operations.

**Comment H18:**

11. Page 4-27: The biological section of the IS/MND as well as associated exhibits label "Features A and B" as "jurisdictional." As stated in the text of the IS/MND neither of these "features" are "jurisdictional;" hence, they cannot be labeled as such. Please update accordingly.

**Response H18:** As stated in Table 4-8 on page 4-32, Features A and B are considered jurisdictional features, although no impacts to Feature B are expected and only temporary impacts are expected on Feature A.

**Comment H19:**

12. Page 4-83: As stated in the cover letter to these comments, the IS/MND repeatedly states (as it does here) that the proposed project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. This is not true.

The bottom hole locations of wells that PXP has rights to drill and operate in this area must be within a certain distance from the surface hole locations of the well in order for the well to be reasonably feasible to drill. This distance is unique to each well and is based upon individual characteristics of the target reservoir, maximum well angles, avoidance of underground facilities and other considerations. Potential bottom hole locations for future oil field development in this area require the use of at least three existing pads in this area. One of these pads is within 50 feet of the proposed trail (just south of the abandoned school) on the parcel immediately south of the property referenced as Segment C and the other two pads are both less than 300 feet from the proposed trail. One of these two pads is located on the property referenced as Segment C and the other is located on the parcel immediately south of it.

Existing regulations prevent the location of new production wells within 300 feet of areas of "public assembly," which the proposed trail could potentially be defined as. General safety considerations relative to the proposed proximity of the oilfield operations and a newly established publicly traveled thoroughfare must also be examined. Therefore, the proposed project would adversely impact IOF oil and gas production, processing and associated activities as well as affect the availability of underlying oil and gas resources on the subject property as well as adjacent properties.

Such an impact is significant as it would result in the stranding, or arguably taking, of a known mineral resource that would be of value to the region, the owners of the mineral rights, and the residents of the state. This impact needs to be appropriately analyzed, classified, and mitigated. Avoidance of this impact would occur by relocating the trail through the abandoned school site, which is designated and zoned for a public/park use, rather than through the existing and active oil field.

**Response H19:** This is the same comment as Comment H4. See Response H4, which is incorporated here by reference as if fully set forth.

**Comment H20:**

13. The proposed trail location at Segment C Blair Hills Corridor crosses a RWQCB permitted/required stormwater basin and stormdrain easement. The flood control basin and easement are not adequately described in the IS/MND or mapped (Exhibit 2-6) and associated impacts are not adequately disclosed, analyzed, classified and mitigated.

The basin is approximately 1.3 acres. Stormwater from portions of the oilfield on both the northeast and northwest sides of La Cienega as well as stormwater and overflow water from the lake at KHSRA drains into the basin. A map depicting the boundary of this stormwater basin is included as Exhibit 1 to this Attachment. The basin is included in PXP's NPDES permit for the Inglewood Oil Field, and functionality of the basin in accordance with this permit is essential for operations of the field and the proposed trail encroaches upon the path of the natural drainage.

The trail as currently proposed encroaches into the basin, and hence, the trail as proposed would be subjected to periodic flooding in this area during rainy seasons. Such flooding poses safety and water quality impacts. To lessen or avoid these impacts, the trail must be reconfigured.

**Response H20:** This is the same comment as Comment H15. See Response H15, which is incorporated here by reference as if fully set forth.

**Comment H21:**

14. Exhibit 3-3 shows the area within Segment C that is proposed for revegetation. The amount of revegetation proposed in this area is inconsistent with the replacement ration of 1:1 identified within MM 4.4-1. Further, much of the re-vegetation is proposed within the existing retention basin on site. The retention basin cannot be vegetated without compromising the functionality of the basin, and hence, operations of the IOF as a whole. MM 4.4-1 also states that "any



habitat proposed for preservation in order to meet the 1:1 criterion shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA." Such a requirement would be of a breach of the oil and gas agreements between BHRCA and PXP as discussed above; therefore, this must be removed.

**Response H21:** This is the same comment as Comment H6 above. MM 4.4-1 calls for mitigation at a ratio no less than 1:1 to be located at an on-site or off-site location. Revised Exhibit 3-3 shows revegetation of the area along the drainage channel between the Lloyd Basin and the storm drain inlet, but does not propose revegetation of the Lloyd Basin or the drainage channel. See Response H6 above, which is incorporated here by reference as if fully set forth.

**Comment H22:**

15. Exhibit 3-3 shows the area within Segment C that is proposed for revegetation. The amount of revegetation proposed in this area is inconsistent with the replacement ration of 1:1 identified within MM 4.4-1. Further, much of the re-vegetation is proposed within the existing retention basin on site. The retention basin cannot be vegetated without compromising the functionality of the basin, and hence, operations of the IOF as a whole. MM 4.4-1 also states that "any habitat proposed for preservation in order to meet the 1:1 criterion shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA." Such a requirement would be of a breach of the oil and gas agreements between BHRCA and PXP as discussed above; therefore, this must be removed.

**Response H22:** This is the same comment as Comments H6 and H21 above. See Responses H6 and H21 above, which are incorporated here by reference as if fully set forth.

**Comment H23:**

16. Table 3-2 indicates that a shade structure will be developed on Segment C; however, Exhibit 3-3 does not show where this shade structure would be located. Also the existing water line that will be re-located needs to be shown in its current and proposed locations as does the drip irrigation system. The access road also needs to be shown where its proposed re-location will be and a description of its width, etc. and impact analysis of moving it needs to be included. The description of Segment C: Blair Hills Corridor Trail on Page 3-3 states that retaining walls would be provided along the western edge of the proposed trail. Plat identifies "Additional Fencing." However, no details are provided herein regarding material, height, etc. Fence will need to be adequate to protect and secure the IOF current and future operations from trail construction and maintenance activities and trail users. Further, the CA Department of Conservation Division of Oil, Gas and Geothermal Resources requires a fence of a minimum of six feet, but not to exceed eight feet in height with at least three strands of barbed wire mounted on top of the fence at this location. The associated impact on stormwater drainage, erosion and any other applicable environmental issue areas need to be evaluated, classified and mitigated.

**Response H23:** Table 3-2 is correct. Exhibit 3-3 has been revised to show that a shade structure would be provided at the interpretive node proposed southwest of the abandoned school site. The existing dirt access road will be replaced in-kind, with the relocated road having the same width. The existing water line is located along the dirt access road and would be relocated to the new alignment of the dirt access road. The proposed fence between the road and the trail will match the existing fence and will meet the requirements of regulatory agencies (i.e., DOGGR) and oilfield operators. The exact location of the proposed drip irrigation line has not been determined at this time and will be designed during the development of construction plans for Segment C.

The water line relocation and proposed drip irrigation would result in ground disturbance, but would be placed underground and thus, would not result in permanent changes in storm water drainage patterns, erosion, or runoff. Similarly, the access road relocation would provide a similar dirt road (including revegetation of adjacent disturbed areas) that would not result in any major changes in drainage, erosion or runoff, since no aboveground structures, impervious surfaces, or major grading and excavation would accompany these improvements.

Please note that the alignment for the proposed trail in Segment C (Blair Hills Trail) is preliminary. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.



**Comment H24:**

17. Page 3-3 Segment C: Blair Hills Corridor Trail. The third paragraph should be revised to read the "existing oil and gas operations road serving the active IOF would need to be relocated..." The proposed relocation of active oil and gas facilities will require a use agreement with PXP as BHRCA's surface property is subject to PXP's rights granted in various oil and gas agreements. As noted above, the 2001 Deed to BHRCA identifies these agreements and notes the surface property is subject to these agreements; PXP is the current Lessee and Operator of these Agreements. Additionally, the proposed alignment would require some type of agreement with Lloyd Properties as the proposed trail passes through the reserved drill site and easement described in detail in the 2001 Deed to BHRCA.

**Response H24:** The first sentence of the third paragraph under Segment C on page 3-3 has been revised as noted. Any required use agreements with Lloyd Properties and/or PXP will be obtained for the proposed trail improvements and the access road relocation in Segment C.

**Comment H25:**

18. Page 4-17: Regional Operational Emissions: This states that the proposed project would have no new trip generation and that no measurable increase in vehicle trips that would be attributed only to the use of the trail and maintenance would be provided by existing KHSRA site personnel. However, other sections of the document disclose that there will be future increases in the number of trail users (Pages 4-62, 4-88, 4-90, 4-97). As stated in comments below on the traffic section, a traffic study must be done to adequately disclose, analyze, classify and mitigate associated air quality impacts from additional vehicle trips.

**Response H25:** The construction of a proposed trail in Segment C will increase the number of trail users in the Blair Hills area by connecting the KHSRA to the Baldwin Hills Scenic Overlook, but the project as a whole does not create major new destinations or facilities that would attract new users to the parks in the area or that would generate significant additional vehicle traffic.

The first sentence of the last paragraph on page 4-18 states that it is not possible to separate the vehicle trips that would be coming to the parks (Culver City Park, Baldwin Hills Scenic Overlook, KHSRA, Ruben Ingold Park, and Norman O. Houston Park) in the Baldwin Hills area that come for the park amenities (e.g., visitor center, overlook, picnic areas, playgrounds, existing trails, lake, gardens, playfields, community room) from the vehicle trips that would be generated by the Park to Playa Trail project alone and that bring in people who would only use the new segments of the proposed trail and not the other park facilities. Future increases in vehicle trips may be generated by the park(s) and existing trails, but would not necessarily be generated by the proposed trail segment or new trail improvements alone. Also, the existing maintenance activities at the KHSRA would extend into Segment C with no additional vehicle trips from outside the KHSRA.

The anticipated increase in trail users would be part of the increase in the number of park visitors and area residents using nearby trails and recreational facilities (as stated at the bottom of page 4-90 and the top of page 4-91), as well as trail users that would come from the Ballona Creek Bike Path, as stated under a) on pages 4-97 and 4-98. These users would not all be driving to the trail and would not be attributed directly to the proposed trail improvements.

Also, if it is conservatively assumed that a typical high-use weekend day would generate 100 new one-way vehicle trips from the use of the new trail segment alone, then the maximum daily operational emissions would be less than 3 percent of the SCAQMD's CEQA significance thresholds. The impact would be negligible and less than significant and no mitigation for associated air quality impacts would be required.

Traffic Impact Studies are typically required for land development projects where permanent and daily traffic is generated, which may impact the local circulation system during the morning (AM) and afternoon (PM) peak hour periods. As stated at the bottom of page 4-102 of the IS/MND, "The majority of Park to Playa Trail users would be driving to and from the proposed trail as they do now. Implementation of the proposed project is not anticipated to result in a substantive increase in vehicle trips during the AM and PM peak hours. Rather, most of the new vehicle trips to and from the Park to Playa Trail would occur before or after peak hours or on weekends, as occurs in the existing condition".

The proposed project would generate minimal weekday peak hour trips when the circulation system is peaking. Since the majority of vehicle trips associated with the proposed project would occur during the weekend when the circulation system has lower baseline traffic volumes, these trips would have no direct effect on worker commute trips during the AM and PM peak hours on weekdays. As noted in the third paragraph on page 4-103 of the IS/MND, "Project-generated vehicle trips would represent a small percentage of existing traffic volumes in the project area that would not occur during peak hours and would not result in substantial traffic congestion". As such, a traffic impact study was not considered necessary.

**Comment H26:**

19. Exhibits 4-10A and 4-10B: PXP contests the accuracy of the biological analysis completed for the preparation of Figures of 4-10A and 4-10B. Accordingly, PXP's biologists are conducting biological surveys and inconsistencies will be provided upon completion of the surveys.

**Response H26:** The biological resource surveys and reports prepared as technical studies for the IS/MND were conducted in accordance with accepted scientific and technical standards and are consistent with the requirements of the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW, formerly the California Department of Fish and Game [CDFG]).

**Comment H27:**

20. Page 4-48: Where did the data showing that as much as ten feet of subsidence occurred at the five points intersection and the center of the IOF come from? What data substantiates the claim that "additional subsidence may have occurred in the northwestern section of the oilfield where oil drilling is currently most intensive?"

These statements are not consistent with the CSD EIR analysis, which states that prior to 1971, the maximum cumulative subsidence of any of the areas along the Newport-Inglewood fault zone was centered over the IOF, where 67,000 acre-feet of oil, water and sand had been withdrawn from shallow production horizons. Water injection into the shallow production horizons began in 1957 and as of 1971, effectively eliminated subsidence associated with oil and gas production.

The CSD EIR is a very thorough and site specific environmental analysis of the IOF, and does not include the subsidence claim at the five points intersection. As such, if this claim cannot be substantiated, it must be removed from this document.

The CSD requires an annual ground movement survey at the IOF, which measures accumulated subsidence or uplift. According to the 2011/2012 surveys, there is no correlation between measured elevation changes and field activities.

Oil drilling is not "currently most intensive" in the northwestern section of the oilfield. New wells that have been drilled or that are scheduled to be drilled are dispersed throughout the field, with no one area of the field receiving a majority of new wells. Remove this claim from the document.

**Response H27:** Because the proposed project is a recreational trail and no habitable structures are proposed, the hazard of subsidence is not a major consideration. Also, the trail is not expected to cause subsidence. Thus, only an overview discussion of subsidence is provided in the IS/MND. The information on subsidence came from the KHSRA General Plan Amendment (page 2-12) and the California Department of Mines and Geology's (CDMG's) Slope Stability and Geology of the Baldwin Hills (page 33). The second sentence under c) has been revised to delete reference to the Five Points intersection. A sentence has been added after this to read: "Subsidence was also observed near the Five Points intersection".

The IS/MND states that the ten feet of subsidence occurred between the 1920s and the 1970s and that water injection has reduced this subsidence. This is consistent with the discussion in the Baldwin Hills CSD EIR, which states that, by 1957, up to ten feet of subsidence had occurred in localized areas of the Baldwin Hills and water injection has since abated this subsidence.



Similarly, the discussion of subsidence in the northwestern section of the oilfield also came from the KHSRA General Plan Amendment (page 2-12). With more recent changes in oil drilling locations, this sentence has been deleted.

**Comment H28:**

21. Page 4-55: The 4th paragraph states that "the alignment of the proposed trail in this segment has been located along the edges of the property farthest from oil drilling operations." This is not true. The trail encroaches well into the Dabney Lloyd lease area, and hence, would create new safety hazards as described in comments below more than it would if the trail were located along the property line and through the abandoned school site. This impact must be adequately and correctly evaluated, and the trail must be moved so it truly is as far from PXP's current and future operations as possible.

**Response H28:** This phrase is in the fourth paragraph on page 4-60. The preliminary trail alignment in Segment C has been developed to be located away from oil and gas operations to the south and, at the same time, as far away from adjacent residences to the north. Thus, it does not align with the northern property line or the southern property line. Instead, the trail segment meanders through the area and will be located within the roadway right-of-way for La Cienega Boulevard and will not involve the taking of private property. The preliminary alignment of the Park to Playa Trail in Segment C is not proposed through the school site due to elevational changes that would make trail use difficult and due to resident opposition. Any future use of this school parcel would be determined after consideration of various design, environmental, and other factors, such as neighborhood needs and concerns. This phrase has been revised to read: "... of the property away from existing oil drilling ....."

Please note that the alignment for the proposed trail in Segment C (Blair Hills Trail) is preliminary. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment H29:**

22. Page 4-57: The analysis of the hazardous materials used and those that potentially would be used at the IOF in Segment C, and the potential risk to the uses of the trail, need to be analyzed. The Baldwin Hills CSD EIR is a good reference.

**Response H29:** While the Baldwin Hills CSD EIR contains information on hazardous material use within the Inglewood Oilfield, this information does not focus on the Park to Playa Trail alignment or on Segment C, which is located adjacent to oil and gas operations and is where the preliminary alignment of the proposed trail in Segment C would be constructed. However, pages 4-57 to 4-58 of the IS/MND acknowledge the potential for soil contamination from past oil drilling operations. Risks to trail users and the construction crews from contaminated soils are addressed under b) on pages 4-59 to 4-61 of the IS/MND.

**Comment H30:**

23. Page 4-59: The 4th paragraph ties the presence of arsenic in soil to oil operations. Arsenic occurs naturally in soil and rock formations throughout the Los Angeles Basin and its occurrence in soil underlying the proposed project is not related to oil development. As documented by the USEPA, when "compared to the rest of the United States, western states have more systems with arsenic levels greater than the [US]EPA's standard of 10 parts per billion (ppb)." Arsenic delineation maps produced by the USGS in 2011 have documented increased levels of arsenic in both Los Angeles County and Southern California as a whole. These data are also consistent

with soils data from the 2008 California Department of Toxic Substance Control (DTSC) memo "Determination of a Southern California Regional Background Arsenic Concentration in Soil." Therefore, the effect of arsenic in soil upon workers/the public needs to be analyzed for all trail segments and the association to oil operations must be removed from this analysis.

**Response H30:** The site investigation for the Eastern Ridgeline Trail detected arsenic in the soils, as stated in the first paragraph on page 4-58. Arsenic has been deleted from the second sentence in the fourth paragraph on page 4-60.

**Comment H31:**

24. Page 4-59: The 4th paragraph states that "the alignment of the proposed trail in this segment has been located along the edges of the property farthest from oil drilling operations." This is not true. The trail encroaches well into the Dabney Lloyd lease area, and hence, would create new safety hazards as described in comments below more than it would if the trail were located along the property line and through the abandoned school site. This impact must be adequately and correctly evaluated, and the trail must be moved so it truly is as far from PXP's current and future operations as possible.

**Response H31:** This is the same comment as Comment H28 above. See Response H28 above, which is incorporated here by reference as if fully set forth.

**Comment H32:**

25. Page 4-59: The 5th paragraph states that no endangerment assessment has been completed for Segment C. Why not? Such an assessment needs to be included to ensure the safety of workers and compliance with CEQA.

**Response H32:** As stated in the last paragraph on page 4-60, potential exposure of the construction and maintenance crews and trail users to soil contaminants is expected to be below the risk thresholds, due to the recreational type of land use proposed (i.e., hiking trail); the presence of users on Segment C for only short periods of time (from a few minutes to one to two hours each time) during a day visit; the limited soil disturbance that would be required during construction of the proposed trail improvements; and the expected lack of



direct human contact with contaminated soils during trail use. Implementation of soil management practices, as outlined in MM 4.8-1, would reduce impacts to the construction and maintenance crews to less than significant levels after mitigation.

Please note that the alignment for the proposed trail in Segment C (Blair Hills Trail) is preliminary. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment H33:**

26. Page 4-64: MM 4.8-1: It is inappropriate and out of the scope of this IS/MND to mitigate future uses of the site (the last two bullet points) - especially since this project only covers a portion of a much larger expanse of land with existing oil and gas operations and existing and future development rights for oil exploration, production, processing and associated activities.

Additionally, this mitigation measure must be edited to reflect that if any contaminated soils are encountered on the oilfield during construction, PXP must be contacted to assist in the determination of responsibility and handling of the contaminated soil.

**Response H33:** Mitigation Measure (MM) 4.8-1 was derived from the soil management practices that have been imposed on the Eastern Ridgeline Trail (Segment H) by the DTSC. This MM would only apply to construction activities associated with the Park to Playa Trail and not to other activities in the Inglewood Oilfield or those by PXP.

**Comment H34:**

27. Page 4-67: The entire second paragraph of the Drainage Patterns section is incorrect and must be deleted. The third paragraph of this section should be corrected to indicate that the portion of the Inglewood Oil Field within the project area drains northeast – there are different drainage patterns in other parts of the field.

**Response H34:** The second paragraph under Drainage Patterns on page 4-68 refers to the detention basin at the western section of Segment C and not the Lloyd Basin southeast of the eastern section of Segment C. The first sentence of the third paragraph under Drainage Patterns on page 4-68 has been revised to read: “A portion of the Inglewood Oilfield south of Segment C....”

**Comment H35:**

28. Page 4-72: j) The Gwen Moore fishing lake also poses seiche hazards to the Dabney Lloyd retention basin in Segment C of the trail as overflow waters from this lake discharge into this basin. This impact needs to be re-evaluated and mitigated based upon this information. Further, this analysis states that trail users are not expected to use and could "stay away" from Segment C during periods of heavy rain when this portion of the trail could be exposed to flooding and mudflow hazards. How would trail users be prevented from doing this? What if trail users did not adhere to this expectation? This impact needs appropriate analysis and mitigation.

**Response H35:** Seiche refers to a standing wave in an enclosed or partially enclosed water body. During a seiche at Gwen Moore Lake, waters would overflow into areas around the lake and into an open drainage channel, where water would flow toward an underground storm drain line connecting to the Lloyd Basin, which is located southeast of the eastern section of Segment C. It is unlikely that a seiche in Gwen Moore Lake will reach the Lloyd Basin due to the distance between the lake and the Lloyd Basin; the presence of an open channel and underground drainage line between these water bodies; and the topography of the surrounding area. While overflowing waters from the Lake may eventually flow into the Lloyd Basin, this inundation hazard would not affect permanent populations or habitable structures within the KHSRA or near the Lloyd Basin.

It is assumed that trail users would not use flooded or muddy trails due to the walking/hiking difficulty and hazards posed by these areas during or right after storms. While some individuals may still use the trails, it is anticipated that they will move away from flood waters. Also, as existing, KHSRA personnel (at the KHSRA, Stocker Corridor, and Blair Hills Corridor), State Rangers (at the Baldwin Hills Scenic Overlook), and Culver City personnel (at Culver City Park) are expected to close public areas and trails that sustain prolonged flooding, as a means to protect public safety in these areas.

**Comment H36:**

29. Page 4-75: The Land Use Section needs to analyze and classify and mitigate any impacts that could occur to potential land locking of parcels due to trail construction.

**Response H36:** The proposed Park to Playa Trail would not subdivide existing parcels to create landlocked parcels with no direct access to a public street or without indirect access through an easement. The trail would be open to the public and would be at grade. It would not create obstructions of access, entry, or exit along the trail alignment, as it crosses roads, sidewalks, driveways, and pathways. The preliminary improvements in Segment C include the relocation of the dirt access road used for oilfield operations, while the gate along the La Cienega ramp will remain in place.

**Comment H37:**

30. Page 4-75: The land use section of this document does not analyze consistency with applicable DOGGR regulations. Update accordingly

**Response H37:** The DOGGR regulations are discussed in Section 4.8, Hazards and Hazardous Materials, and RR 4.8-3 requires project compliance with pertinent DOGGR regulations.

**Comment H38:**

31. Page 4-75: The land use section did not compare trail specifications to the Dept. of Public Works applicable regulations, standards and guidance documents. Update accordingly.

**Response H38:** The proposed Park to Playa Trail is being coordinated with and co-sponsored by the County of Los Angeles. Thus, it will be designed and built in accordance with applicable County standards, including the County of Los Angeles Department of Public Works' trail specifications.

**Comment H39:**

32. Page 4-79: Table 4-12. This table states that the Social Resources goal of providing appropriate economic opportunities is not applicable. This is not correct as PXP has rights granted in various oil and gas agreements on the property where Segment C of the proposed trail would be. As such, the potential impacts to impeding economic development of these resources must be analyzed and mitigated.

**Response H39:** The BHRCA recognizes the rights of other parties to underlying mineral resources in Segment C, and the proposed project does not propose to restrict, block, or remove the rights of the PXP afforded by agreements that have been established among various parties. Therefore, the project will not impede economic development. Any required use agreements with PXP and/or Lloyd Properties will be obtained prior to the implementation of proposed trail improvements in Segment C.

**Comment H40:**

33. Page 4-82: 1st paragraph: The IOF covers approximately 1,000 acres, not 950 acres as written. Update accordingly.

**Response H40:** The reference to the size of the Inglewood Oilfield has been revised to 1,000 acres on page 4-82.

**Comment H41:**

34. Page 4-82: Oil Resources, 2nd paragraph: This text states that no trail improvements are proposed on or near active oil wells. This is not true. There are active wells within 500 feet of the proposed trail.

**Response H41:** Since “near” is a relative term, this sentence has been replaced to state “within 100 feet of”.

**Comment H42:**

35. Page 4-82: a) states that the dirt roads in this area would remain in place to allow future oil drilling activities; however, the proposed project includes a proposal to move an existing dirt road to accommodate the trail.

**Response H42:** This sentence has been revised to state “...remain in place or be relocated...”.

**Comment H43:**

36. Page 4-85: Table 4-13 indicates that ambient noise levels were measured by calculating averages from only 20 minutes of noise measurements at each noise measurement site. An adequate noise baseline is achieved with a minimum of three days of non-stop noise measurements on week days (when the most noise is typically generated; hence, allowing for a CEQA mandated, worst case scenario). The noise baseline must be re-established using standard noise measurement/baseline determination methodology.

**Response H43:** Three days of non-stop noise measurements are not required to establish an adequate baseline for the noise environment. The purpose of noise monitoring is to determine a representative existing ambient noise level for the period when the proposed trail would likely be used (i.e., during the daytime). The duration of the measurement is selected based on the requirement that the data is representative of the average noise level,  $L_{eq}$ .

The California Department of Transportation’s (Caltrans) Technical Noise Supplement states that a noise measurement representing an hourly  $L_{eq}$  does not need to last the entire hour. As long as noise levels do not change significantly, a shorter time period will usually be sufficient to represent the entire hour of interest. The recommended length of measurements depends on how much the noise levels fluctuate—the higher the fluctuations, the longer the measurement must be. Vehicle traffic volumes and differences in vehicle types are responsible for fluctuating noise levels. These fluctuations decline as traffic densities increase. Highway noise also becomes more constant as the distance from the highway increases because the rate of distance change between a moving vehicle and a receiver diminishes. The durations in Table H1 are recommended for highway traffic noise measurements as a function of number of vehicles per hour (vph) per lane.



**TABLE H1  
SUGGESTED NOISE MEASUREMENT DURATIONS**

Traffic Volume	Vehicles per Hour per Lane	Duration (Minutes)
High	>1,000	10
Medium	500–1,000	15–20
Low	<500	20–30
Source: Caltrans 2009.		

Most sound level meters automatically integrate and digitally display cumulative  $L_{eq}$ . Near the beginning of each measurement period, the displays fluctuate considerably. However, after more data are collected, they tend to stabilize. The time necessary to stabilize the measurement depends on the amount of noise fluctuation. A measurement may be terminated when the range of the fluctuation in displayed  $L_{eq}$  is less than 0.5 dBA. However, measurements can be lengthened if necessary.

For this project, the noise meter was observed and measurement was continued until there is minimal variation in  $L_{eq}$ . Thus, the data shown in Table 4-13 of the IS/MND are representative of the daytime ambient noise levels at the measurement locations.

Long-term monitoring that includes nighttime noise is only appropriate when there is a potential for the project to generate noise at night, such as for 24-hour business operations or power plants. It is not necessary for the proposed trail.

**Comment H44:**

37. Page 4-88: c) This analysis states that new noise resulting from the project would be similar to maintenance noises currently occurring and would not result in a substantial increase in ambient levels. This is untrue as portions of the trail, in particular Segment C, currently do not have any park users using the property and any new noise from this new use would increase ambient noise levels. In consideration of this, this impact needs to be appropriately analyzed, classified and mitigated.

**Response H44:** The noise analysis in the IS/MND acknowledges that there would potentially be more users on the trail than at present, and some new or modified trails would be closer to residences, thus resulting in a greater potential and an increase in the incidence of hearing noise from the trail at adjacent residences. However, the noises associated with the trail would be intermittent and, when considered in the context of the existing noise levels and other neighborhood noise sources, would result in an increase of less than 1 dBA and thus, would not be considered substantial. A substantial noise increase is usually defined as a change in noise level greater than 3 dBA, which is the change in noise that is barely discernible to the average human ear, or 5 dBA, which is the change in noise that is clearly discernible to the average human ear. (Caltrans defines a substantial noise increase as 12 dBA during the loudest hour.) Thus, the standard for determining a

significant impact is usually 3 dBA. As discussed on pages 4-87 through 4-89 in the IS/MND, long-term noise impacts would be less than significant and no mitigation is required.

**Comment H45:**

38. Page 4-90: Trail Users: This section states that no comprehensive count of trail or park users has been made. Without this count, how can environmental impacts be adequately evaluated, classified and mitigated? Such a study must occur if this environmental analysis/document is to be adequate per CEQA.

**Response H45:** The proposed project will connect a seven-mile system of walking, hiking, and bicycle trails in the Baldwin Hills. Most all of the trails and associated facilities already exist. The only new trail connection is the  $\frac{1}{3}$ -mile connection across a portion of the BHRCA property from the Baldwin Hills Scenic Overlook east to La Cienega Boulevard and the KHSRA (Segment C). The anticipated number of trail users on Segment C is expected to be lower than the current number of trail users on the existing trails at the KHSRA and other segments of the Park to Playa Trail that are located closer to developed park facilities since the proposed trail would only be connecting the two parks and would not be considered a destination. The preliminary alignment of the trail will be passing through a relatively unimproved environment and will not feature amenities or facilities, except an overlook/rest area. Thus, it will likely be used by only a small fraction of the users of KHSRA and the Baldwin Hills Scenic Overlook, which conservatively can be estimated at a maximum of a few dozen trail users per day. The anticipated extent of trail use is going to represent a fraction of the total park users and is not projected to be so heavy or crowded, so as to exceed the capacity of the trail as designed. Based on the determination that there will be a relatively limited number of trail users, count projections are not necessary to evaluate potential impacts of trail use.

The anticipated minor increase in trail use is also related to the provision of additional parking spaces at a trailhead proposed at the La Brea Avenue/Overhill Drive/Stocker Street intersection (Five Points Intersection). The primary objective in providing the extent of additional parking at this location is to provide off-street parking for the adjacent Ruben Ingold Park and to reduce parking on adjacent neighborhood streets by park and trail users. As noted in the second paragraph under Segment I: Stocker Corridor Trail on page 3-5 of the IS/MND, "The trailhead would have a parking area that would be paved with gravel and would accommodate approximately 28 to 50 cars". Peak use of the trail is expected to occur on the weekends when the local circulation system is off-peak. If 50 percent of the proposed new parking supply is utilized by trail users driving to the trailhead during one peak hour on a Saturday morning, then the additional vehicular traffic added to adjacent roadways is conservatively forecasted to be 25 vehicles. Accordingly, the 25 to 50 additional trail users might walk west or east along the Park to Playa Trail, so approximately 13 to 25 additional pedestrians would cross at the Five Points Intersection during weekend hours. As discussed on page 4-106, compliance with RR 4.16-2 will prevent adverse impacts related to hazards associated with pedestrian crossings.

Since the potential environmental impacts of a project are directly related to the existing environmental setting, the analysis of impacts from the Park to Playa Trail have been made based on the type and size of trail improvements in comparison to the existing land uses, activities, and improvements that are going to be affected by the project. The precise projection of the number of trail users is not considered necessary to determine the impacts of the project on most environmental issues, since some impacts will remain the same with any number of trail users, and other impacts would not be significant even with higher numbers of trail users. On other issues, count projections are also not needed to evaluate the potential impacts of the project, since current trail use is part of the existing use of developed parks (i.e., Culver City Park, Baldwin Hills Scenic Overlook, KHSRA, Ruben Ingold Park, and Norman Houston Park) where the existing trails are located. With a much larger visitor population at the developed parks than the actual number of trail users and the likely increase in users of the new and/or improved trail segments proposed by the Park to Playa Trail, existing and future trail use projections are not necessary to evaluate project impacts.

**Comment H46:**

39. Page 4-91: b, c) This text includes an analysis of business/employee displacement, which is not applicable to the checklist questions regarding displacement of housing and people within such housing. Remove.

**Response H46:** While the checklist questions b) and c) refer to housing and household displacement, the response has been expanded to include business and employee displacement to provide a more comprehensive discussion of potential displacement impacts.

**Comment H47:**

40. Page 4-93: 4.15.2 a) (i) states that the project would not increase the demand for fire protection services; however, as stated above, the proposed project would increase the risk of fire in Segment C. Increased fire risk at an oilfield is a significant, environmental impact. As such, this section needs to include this risk analysis, and how it would affect emergency response service levels to appropriately analyze, classify and mitigate this impact. Note that simply including "no smoking signs" or the like are not adequate mitigation for such a risk, especially since there is no proposed method of enforcement nor is there direct vehicle access for police patrolling on trail Segment C.

**Response H47:** The preliminary trail alignment would not be located where active oil and gas drilling operations occur.

As discussed in Section 4.8, the IS/MND states that short-term construction activities, increased use of the trail in the long term, and periodic maintenance activities could increase the risk for brush fires and could generate additional demands for fire protection services. However, the project

would need to comply with RR 4.8-4, which requires a permit from the County and the implementation of permit provisions regarding the availability of fire protection equipment; an adequate water supply; creation of fire breaks; installation of warning signs; brush removal; adequate emergency access; fencing; and the use of equipment and machinery with spark arresters. In addition, RR 4.8-5 requires the project to post signs, which would outline prohibitions on open burning; smoking, flaming or glowing objects; and open flames. Also, the adjacent oil and gas operations implement a number of safety and emergency programs and plans to prevent and reduce fire and other safety hazards in the oilfield.

Fire protection services along the trail alignment are provided and would continue to be provided by the Los Angeles County Fire Department, the Los Angeles City Fire Department, and the Culver City Fire Department. Law enforcement and police protection services are provided and would also continue to be provided by the Los Angeles County Sheriff's Department, the Los Angeles City Police Department (LAPD), and the Culver City Police Department, with security at the Baldwin Hills Scenic Overlook provided by State Rangers. These would reduce impacts on fire protection services and no risk analysis is necessary. The improvement of existing trails would not increase response times from public service agencies and the construction of new trails would not pose major threats to public safety that would increase response times. Also, no new public service facilities are needed to serve the proposed trail.

**Comment H48:**

41. Page 4-99: A parking analysis was not conducted. Will the existing parking lots be able to accommodate all of the existing and new park/trail users? This potential impact needs to be analyzed, classified and mitigated.

**Response H48:** Parking impacts are no longer required to satisfy CEQA Checklist G requirements. As noted in the last paragraph on page 3-1 of the IS/MND, "To promote trail use, a trailhead would be constructed that would include a parking area, signs, bike racks, a map kiosk, trash cans, and benches at the Five Points intersection." The provision of additional parking is primarily expected to alleviate parking demand at the nearby Ruben Ingold Park. See Response H45 for the projection of the number of trail users.



**Comment H49:**

42. Page 4-103: b) A traffic study was not done for the proposed project, and as such, the analysis, classification of impacts and mitigation in the transportation/traffic section of this document is not adequate. This section simply states that the project would not generate 50 or more trips on mainline freeways, and therefore, a traffic impact analysis would not be required. How was it determined that the project would cause less than 50 trips? How was it determined that most trail users would come to the trail outside of peak hours? In order to make such determinations, a traffic count must be conducted. The estimated number of new vehicle trips and new users this trail would generate needs to be disclosed and analyzed in conjunction with applicable level of service standards and CEQA thresholds of significance.

**Response H49:** See Response H25 for a discussion related to traffic studies.

**Comment H50:**

43. Page 4-103: b) this states that "the proposed trail alignment would not be located along or cross La Cienega Blvd. " This is not true. The proposed trail alignment runs along La Cienega Blvd. on the west side of the KHSRA overpass. Hence, this impact needs re-evaluation, appropriate classification and mitigation.

**Response H50:** The preliminary alignment of the proposed trail would be located along the southbound off-ramp that leads to the bridge over La Cienega Boulevard. However, it would not be located along the main travel lanes on La Cienega Boulevard so as to directly affect traffic flows on this roadway. Since the trail would be placed outside the travel lanes on the ramp, impacts on a Congestion Management Plan (CMP) highway would still be less than significant. Trail users crossing the bridge at both ends would not be at high volumes or during peak hours, so as to affect level of service at the La Cienega bridge.

The design of the La Cienega bridge crossing has been determined to be a safety concern, which will be addressed during the final design of Segment C, in coordination with Culver City and Los Angeles County engineering staff, to ensure that the crossing meets safety standards. Also, the feasibility of a pedestrian bridge over La Cienega Boulevard is being re-evaluated.

Please note that the alignment for the proposed trail in Segment C (Blair Hills Trail) is preliminary. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment H51:**

44. Page 4-104: d) Traffic safety impacts with relation to the pedestrian/bicyclist and vehicle interaction were not analyzed. This needs to be included in the document. The La Cienega overcrossing and the 5-points intersection are a dangerous intersections for pedestrians and bicyclists to use and cross. The La Cienega overcrossing to Segment C of the proposed project would require trail users to descend a steep decline from the bridge at KHSRA to La Cienega. How would the trail be designed to avoid trip and fall hazards from this steep decline? How would emergency vehicles access the trail should a user become injured on the trail?

**Response H51:** See Response H45. The proposed crossings at the La Cienega bridge and at the Five Points Intersection do not entail traversing a steep slope. As the proposed trail descends along the La Cienega southbound off-ramp, it will feature grades for recreational trails with respect to gradient and all other trail design considerations that are compliant with the Americans with Disabilities Act (ADA); it will also have emergency access from several locations. The trail will meet all standards for a typical multi-use public recreational trail, including those in the Los Angeles County Trail Manual. Emergency access to the trail would be provided by travel lanes on La Cienega Boulevard (southbound to the trail at the off-ramp or northbound to the off-ramp and over the bridge).

**Comment H52:**

45. Page 4-109: c) The proposed trail and proposed revegetation in Segment C encroaches upon an existing, RWQCB permitted, stormwater basin at the IOF. As such, the trail and revegetation would be subjected to periodic flooding, and would contribute to stormwater runoff that would require compliance with the IOF NPDES permit. This impact needs re-evaluation, classification and mitigation (particularly, re-alignment of the trail to avoid the retention basin).

**Response H52:** The proposed revegetation along the preliminary alignment of the trail in Segment C would be confined to areas near the drainage channel within the BHRCA property, downstream of the Lloyd Basin. No revegetation is proposed in the Lloyd Basin or the channel. Revegetation is generally considered to be beneficial for storm water runoff as it slows runoff velocity; increases ground percolation; and removes pollutants (i.e., suspended solids and trace metals) from the runoff. Pollutant removal is considered the main purpose of vegetated swales (bioswales), bioretention ponds, wet ponds, constructed wetlands, and vegetated buffer strips. Thus, the proposed revegetation is not expected to have adverse impacts on water quality, as regulated by the RWQCB. Review of the NPDES Permit for the Inglewood Oilfield indicates that Discharge Point No. 2 for the Oilfield is at the discharge pipe of the Lloyd Basin. As indicated, no improvements are proposed in the Lloyd Basin, although the preliminary alignment of the proposed trail along the La Cienega ramp would pass near the northeastern corner of the basin, but would not be located on the parcel occupied by the basin. See Response H5.

**Comment H53:**

46. Page 4-110: f, g) Impacts from waste generated from potential petroleum impacted soil were not evaluated. This needs to be included, classified and mitigated.

**Response H53:** This is the same comment as Comment H16. See Response H16, which is incorporated here by reference as if fully set forth.

**Comment Letter I: Cone Fee Trust  
(February 18, 2013)**

**Comment I1:**

The Cone Fee Trust (CFT) is a landowner within the Inglewood Oil Field (IOF) and writes to you as part of CFT's comment on the Initial Study/Mitigated Negative Declaration (IS/MND) relative to the Park to Playa concept. For the reasons enumerated below (and joining in and incorporating many of the comments of CFT's lessee, Plains Exploration & Production Company (PXP) lodged on February 15, 2013), CFT objects to the Park to Playa Project (to the extent to which the County seeks to impose a trail-way across a portion of and along the perimeter of the IOF) and finds myriad substantive defects with the IS/MND which compel the County to revise the plan overall, revise and expand the scope and content of the IS/MND requiring the completion of an EIR and to end any further consideration of allowing for trail-ways across and immediately adjacent to the IOF.

**Response I1:** The BHRCA owns the surface rights within Segment C, and Lloyd Properties has rights to underlying mineral resources and has various easements on the property. Any required use agreement with PXP and/or Lloyd Properties would be obtained prior to the development of a trail on the property.

The BHRCA recognizes that the proposed Park to Playa Trail would have potential environmental impacts and thus, authorized preparation of an Initial Study to analyze these impacts. Based on the analysis in the IS/MND, the project would have adverse impacts on some environmental issue areas. There are existing local, State, and federal regulations or laws with which the proposed project would need to comply, and which would serve to offset or prevent certain environmental impacts. These regulatory requirements (RRs) are called out in the IS/MND. In addition, a number of MMs have been developed to avoid or reduce the significant environmental impacts of the project. With project compliance with the RR's and implementation of the MMs as part of the project, the potentially significant environmental impacts from the proposed Park to Playa Trail would be reduced to less than significant levels for all issue areas. Thus, the project qualifies for a Mitigated Negative Declaration.

The BHRCA published a Notice of Intent to Adopt the MND and mailed out the Notice and IS/MND to various affected public agencies. While not required under CEQA, the BHRCA held a public meeting to discuss the project and the IS/MND. Also, in response to the comments on the Notice and the IS/MND, the IS/MND has been revised. However, the impacts of the proposed trail are still expected to be less than significant after mitigation. Thus, an EIR is not considered to be necessary for the proposed project. Section 21082.2(b) of CEQA and Section 15064(f)(4) of the CEQA Guidelines state that "the existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence in light of the whole record before the Lead Agency that the project may have a significant effect on the environment".



The IS/MND, appendices to the IS/MND, comments on the IS/MND, and responses to the comments do not provide substantial evidence that an EIR is required.

At a meeting that was held with oilfield property owners and operators on April 17, 2013, the BHRCA committed to continue working with adjacent residents, property owners, the oilfield operator, the City of Culver City, and stakeholders to better define the trail alignment and proposed improvements for Segment C. Revisions have been made to the IS/MND to indicate that the proposed trail in Segment C is only a preliminary alignment, subject to further refinement and additional environmental review.

**Comment I2:**

1. **The Park to Playa plan, which seeks to install a trailway along the perimeter of the IOF, should be redesigned so that no trails come across and/or immediately abut oil field property and are otherwise of a sufficient distance away from any oil and gas operations and equipment so that the operations and equipment are sufficiently insulated from public access.** Although CFT disputes the false characterizations offered by various special interests concerning features of the IOF and the effects of operations thereat, it is respectfully suggested that the County not invite – through the ill-conceived trail-ways – the public to the areas across and immediately around the IOF’s perimeter. Such a design needlessly increases the risk of frivolous lawsuits and unwarranted interference with the lawful uses within and upon the IOF. CFT suggests that the County re-design its trail-ways so that there are none which will cross any portion of or which will run along or immediately adjacent to the IOF perimeter.

**Response I2:** The preliminary alignment of the proposed trail in Segment C would be located within the roadway-right-of-way of La Cienega Boulevard and within BHRCA-owned parcels. No portion of the trail will go on property owned by Cone Fee Trust. There are existing fences that separate the oil and gas operations from adjacent streets and private properties. These fences have been provided by the oilfield operator in accordance with DOGGR regulations. In addition, well operations are regulated by the DOGGR to protect life, health, property, and natural resources (*California Code of Regulations*, Title 14, Division 2, Chapter 4). Also, public safety and security measures (i.e., keeping unmanned entrances closed and 24-hour security) are required under the Baldwin Hills CSD for the portions of the oilfield within the unincorporated County area. The Culver City Municipal Code does not specifically address required fencing or security measures as they relate to oil, gas, and hydrocarbon operations in the City, but does require compliance with applicable City, County, State, and federal laws. The proposed revisions to the Culver City oil drilling regulations will require a 24-hour security guard for the oilfield, with gates kept closed at all times except when vehicles enter or leave the oilfield. It also requires fencing in compliance with DOGGR regulations.

The existing fence and gate along the La Cienega ramp will remain in place, in accordance with DOGGR and PXP requirements. No direct access to the oilfield operations is proposed with the trail. In preliminary plans, fencing is proposed as part of the Park to Playa Trail to run along the southern and western sides of the proposed trail, as it passes through the eastern section of Segment C adjacent to oil and gas operations. The fence would protect adjacent oil and gas production activities from unauthorized access, trespassing, and/or vandalism.

**Comment I3:**

In addition to common sense, the authority for this prudent course is statutory. California Public Resources Code Section 15370 specifically requires the County to consider scrapping this component of the Park to Playa plan altogether. Section 15370 defines "Mitigation" to include: " (a) Avoiding the impact altogether by not taking a certain action or parts of an action; (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (e) Compensating for the impact by replacing or providing substitute resources or environments." Similarly, PRC Section 21081.6(b) makes clear that avoidance of harm is one of the paramount purposes of the mitigation directive: "A public agency shall provide that measures to mitigate or avoid significant effects on the environment are **fully enforceable** through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents which address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other public project, by incorporating the mitigation measures into the plan, policy, regulation, or project design."

The IS/MND cites no good cause for the trail-ways to cross upon and/or immediately abut IOF property and in such proximity to oil and gas operations and equipment. As the County knows, the CSD, as originally enacted and subsequently addressed in a settlement between the County, PXP and special interests provides for certain green belts and buffers; however, these accommodations are not and were never intended to be an invitation to bring the public *closer* to the IOF or the oil and gas operations.

**Response I3:** CEQA does not require that all environmental impacts be avoided, only that a project's significant environmental effects be avoided or reduced to less than significant levels. As stated in Response I1 above, there are existing local, State, and federal regulations or laws with which the proposed Park to Playa Trail project would need to comply; these regulations would serve to offset or prevent certain environmental impacts. These RRs are called out in the IS/MND. In addition, a number of MMs have been developed to avoid or reduce the significant environmental impacts of the project to less than significant levels. With the incorporation of the RRs and implementation of the

MMs, potentially significant environmental impacts from the proposed Park to Playa Trail would be reduced to less than significant levels. These RRs and MMs would be incorporated into the project and a Mitigation Monitoring and Reporting Program (MMRP) has been developed to verify compliance with these RRs and MMs.

The objectives of the Park to Playa Trail are outlined in Section 3.1 of the IS/MND. Since much of the Baldwin Hills is located over the Inglewood Oilfield, the proposed trail goes over the oilfield in several locations. The Baldwin Hills CSD (Section 22.44.142 of the Los Angeles County Code) and the Settlement Agreement for the CSD establish regulations to protect the public health, safety, and general welfare and to ensure that Inglewood Oilfield operations are compatible with adjacent land uses. The CSD applies to oilfield operations on land within the unincorporated area of the County and does not include land in Culver City that is located in Segment C and immediately south of this segment. The proposed trail would not go into the areas included in the CSD. Due to the legal challenges to the Baldwin Hills CSD EIR, the use of the CSD EIR could open the potential for legal challenges to the Park to Playa Trail CEQA document as well. Thus, reliance on the Baldwin Hills CSD EIR or incorporation by reference was not made by the IS/MND for the Park to Playa Trail project.

The preliminary alignment of the proposed trail in Segment C is located over 450 feet north of the Culver City/Los Angeles County line. The CSD provides incentives for the abandonment of wells within 800 feet of any developed area. The existing City of Culver City regulations (Chapter 11.12 of the Culver City Municipal Code) for oil and gas wells have also set a 300-foot setback from a major public street, sidewalk or highway; 100-foot setback from the outer boundary of the parcel of land; a 100-foot setback from a steam boiler building or source of ignition; and a 300-foot setback from school buildings or other places of public assemblage. The proposed trail in Segment C would be located within these setbacks.

The City of Culver City is proposing new oil drilling regulations that, if approved, will establish a 400-foot setback from parcels developed with a residential, recreational, institutional, commercial, industrial, or office structure and a 75-foot setback from public roads. The proposed trail in Segment C would be located within these proposed setbacks. Since the trail would not be considered a developed area or public road, it would not expand the setback areas beyond the limits that will be required by the proposed regulations.

The property deed states that Lloyd Properties reserves rights to all mineral resources and that the BHRCA may make improvements to the surface, as long as it does not interfere with rights to extract mineral resources. There are also various easements in Segment C. However, the easements are non-exclusive and may be moved if they interfere with BHRCA's use of the property.

Please note that the alignment for the proposed trail in Segment C (Blair Hills Trail) is preliminary. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for

this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment I4:**

2. **From a public safety standpoint, the IS/MND also fails to address the obvious homeland security and terrorism concerns attendant to having public access across and along the perimeter of the IOF; as such, the IS/MND does not comply with and fails to meet the mitigation evaluation requirements under governing law.** Installing a public trailway immediately abutting and adjacent to an active and extensive oil and gas exploration and production field implicates innumerable security issues. Yet, the IS/MND is silent on this subject (a silence even more problematic given, as discussed below, the omission of any projected user data to assess the average number of users on a daily, weekly or monthly basis). The IS/MND should, therefore, be tabled pending an initial threshold review of the security risks to the IOF posed by the proposed trailways along the IOF's perimeter and unnecessarily close to oil and gas operations and equipment.

**Response I4:** The adjacent oil and gas operations implement a Site Security Plan that meets the Chemical Facility Anti-Terrorism Standards in the *Code of Federal Regulations* (6 CFR 27) to reduce the potential for terrorism and to increase homeland security. Also, there are existing trails in the KHSRA adjacent to the Inglewood Oilfield that have not led to or increased threats to homeland security, nor have they encouraged terrorism. The preliminary alignment of the proposed trail in Segment C would essentially be a connection between nearby trails and is not expected to create a public safety hazard to the State or the country due to its location near the Inglewood Oilfield. See Response I2 regarding security and the hazards of oil and gas operations.

The proposed project will connect a seven-mile system of walking, hiking, and bicycle trails in the Baldwin Hills. Most all of the trails and associated facilities already exist. The only new trail connection is the  $\frac{1}{3}$ -mile connection across a portion of the BHRCA property from the Baldwin Hills Scenic Overlook east to La Cienega Boulevard and the KHSRA (Segment C). The anticipated number of trail users on Segment C is expected to be lower than the current number of trail users on the existing trails at the KHSRA and other segments of the Park to Playa Trail that are located closer to developed park facilities since the proposed trail would only be connecting the two parks and would not be considered a destination. The preliminary alignment of the trail will be passing through a relatively unimproved environment and will not feature amenities or facilities, except for an overlook/rest area. Thus, it will likely be used by only a small fraction of the users of KHSRA and the Baldwin Hills Scenic Overlook, which conservatively can be estimated at a maximum of a few dozen trail users per day. The anticipated extent of trail use is going to represent a fraction of the total park users and is not projected to be so heavy or crowded, so as to exceed the capacity of the trail as designed. Based on the determination that there will be a relatively limited number of trail users, count projections are not necessary to evaluate potential impacts of trail use.



The anticipated minor increase in trail use is also related to the provision of additional parking spaces at a trailhead proposed at the La Brea Avenue/Overhill Drive/Stocker Street intersection (Five Points Intersection). The primary objective in providing the extent of additional parking at this location is to provide off-street parking for the adjacent Ruben Ingold Park, and to reduce parking on adjacent neighborhood streets by park and trail users. As noted in the second paragraph under Segment I: Stocker Corridor Trail on page 3-5 of the IS/MND, “The trailhead would have a parking area that would be paved with gravel and would accommodate approximately 28 to 50 cars”. Peak use of the trail is expected to occur on the weekends when the local circulation system is off-peak. If 50 percent of the proposed new parking supply is utilized by trail users driving to the trailhead during one peak hour on a Saturday morning, then the additional vehicular traffic added to adjacent roadways is conservatively forecasted to be 25 vehicles. Accordingly, the 25 to 50 additional trail users might walk west or east along the Park to Playa Trail, so approximately 13 to 25 additional pedestrians would cross at the Five Points intersection during weekend hours. As discussed on page 4-106, compliance with RR 4.16-2 will prevent adverse impacts related to hazards associated with pedestrian crossings.

Since the potential environmental impacts of a project are directly related to the existing environmental setting, the analysis of impacts from the Park to Playa Trail have been made based on the type and size of trail improvements in comparison to the existing land uses, activities, and improvements that are going to be affected by the project. The precise projection of the number of trail users is not considered necessary to determine the impacts of the project on most environmental issues, since some impacts will remain the same with any number of trail users and other impacts would not be significant even with higher numbers of trail users. On other issues, count projections are also not needed to evaluate the potential impacts of the project, since current trail use is part of the existing use of developed parks (i.e., Culver City Park, Baldwin Hills Scenic Overlook, KHSRA, Ruben Ingold Park, and Norman Houston Park) where the existing trails are located. With a much larger visitor population at the developed parks than the actual number of trail users and the likely increase in users of the new and/or improved trail segments proposed by the Park to Playa Trail, existing and future trail use projections are not necessary to evaluate project impacts.

Please note that the proposed trail in Segment C (Blair Hills Trail) is being designed at a slower pace than other segments and construction details are still being worked out for this second phase of the project. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. When the trail alignment for Segment C is set, it will be subject to additional environmental analysis and review.

**Comment I5:**

3. **Without an Environmental Impact Report (EIR), the IS/MND does not comply with or fulfill CEQA requirements.** In its current form, the IS/MND omits the CEQA requirement that the environmental impacts under CEQA be adequately revealed and reviewed so that the Lead Agency and the public are provided with sufficient degree of analysis to allow them to accurately determine if the project may have a significant effect on the environment. CEQA also requires the support of a known mineral resource that is of value to the region and the residents of the state. The IOF represents a substantial mineral resource base that, through the efforts of the landowners in the IOF and the oil and gas operators, has long been a valuable contributor to the region and residents of Los Angeles County and the state. What cannot be overlooked either is the very significant revenue stream to the County

which these operations provide and will provide for the foreseeable future. The omission of the EIR and a rigorous analysis of the net and long term benefits of the IOF to the County and its residents underscores that the Park to Playa concept – as it relates to the areas across and immediately abutting the IOF – have not been studied.

**Response I5:** See Response I1 for a discussion on the purposes of an Initial Study and why the preparation of an EIR is not considered necessary.

The Park to Playa Trail proposes a preliminary trail alignment and improvements that would include a new trail segment, fencing/retaining wall, signs, an interpretive node, revegetation planting, and irrigation in Segment C. The preliminary alignment of the proposed trail in the eastern section of Segment C would be located within setback areas required by the City of Culver City. The trail improvements would not preclude existing and future oil and gas production activities in nearby areas. Rather, relocated fences and dirt roads will be provided in Segment C to protect adjacent existing oil and gas production activities from unauthorized access, trespassing, or vandalism. No extraction or use of underlying mineral resources is proposed with the trail project, and no active oil or gas well removal is planned. Also, access to underlying mineral resources would continue to be available as no large impervious surfaces or buildings are planned, as stated on page 4-83 of the IS/MND. The revenue and benefits of the oilfield to the County and its residents need not be analyzed in the IS/MND because the trail project does not include new or changed oil and gas production activities in the Inglewood Oilfield.

**Comment I6:**

Moreover, the IS/MND which fails to include a traffic density study and analysis and fails to include usage projections (omissions which mislead any unfamiliar reader to erroneously assume that traffic volume is somehow far less than the 500,000+ cars a week that do pass on La Cienega and La Brea between La Tiejra and Rodeo during peak traffic hours alone). Notably, the Baldwin Hills CSD Final EIR (Section 4.7 Transportation and Circulation) provides a detailed resource for the calculation of then existing traffic usage; yet, the IS/MND ignores this valuable resource and glosses over, with patently inadequate information and merely conclusions, one of the key public safety issues – traffic and pedestrian interaction and usage. Further, the IS/MND fails to address homeland security/terrorism and the practicalities and risks associated with bringing the public across and immediately around the IOF. Under these circumstances, the IS/MND simply cannot be said to include a forthright and fully vetted discussion of the mitigation criteria as required by law. An IS/MND does not supply all the required data supplied in an EIR so agencies are forced to demand changes later during the construction review process when they will finally receive project detail. Without the proper analysis provided in an EIR, these same agencies are asked to sign off on a project with only an IS/MND and are blind since all the required studies of CEQA were not being supplied at this time.

**Response I6:** Traffic volumes on nearby roadways are included in the IS/MND for Interstate (I) 10, Jefferson Boulevard, Rodeo Road, La Cienega Boulevard, La Brea Avenue, and Stocker Street. As noted in the second bullet on page 4-100 of the IS/MND, the La Cienega Boulevard peak hour traffic volumes for year 2010 ranged between “4,850 to 6,756 vehicles during the AM peak hour and 4,843 to 6,598 vehicles during the PM peak hour between Stocker Street and Rodeo Road”. Also noted on page 4-100 of the IS/MND are the on- and off-ramps to a bridge over La Cienega Boulevard, which provides direct vehicular access to the KHSRA entrance. The proposed Park to Playa Trail would use this bridge overcrossing to connect the KHSRA to the Baldwin Hills Scenic Overlook. However, the feasibility of a separate pedestrian bridge over La Cienega Boulevard is being re-evaluated.

The construction of a proposed trail in Segment C will increase the number of trail users in the Blair Hills area by connecting the KHSRA to the Baldwin Hills Scenic Overlook, but the project as a whole does not create major new destinations or facilities that would attract new users to the parks in the area, or that would generate significant additional vehicle traffic. See Response I4 for a discussion of projections of trail users.

The vehicle trips that would be coming to the parks (Culver City Park, Baldwin Hills Scenic Overlook, KHSRA, Ruben Ingold Park, and Norman Houston Park) in the Baldwin Hills area to use the existing park amenities (e.g., visitor center, overlook, picnic areas, playgrounds, existing trails, lake, gardens, playfields, community room) cannot be readily separated from the vehicle trips that would be generated by the Park to Playa Trail project and that would bring in people who would only use the new segments of the

proposed trail and not the other park facilities. Future increases in vehicle trips may be generated by the park(s) and existing trails, but would not necessarily be generated by the proposed trail segment or new trail improvements alone. Also, the existing maintenance activities at the KHSRA would extend into Segment C with no additional vehicle trips from outside the KHSRA.

The anticipated increase in trail users would be part of the increase in the number of park visitors and area residents using nearby trails and recreational facilities (as stated at the bottom of page 4-90 and the top of page 4-91 in the IS/MND), as well as trail users that would come from the Ballona Creek Bike Path, as stated under a) on pages 4-97 to 4-98 in the IS/MND. These users would not all be driving to the trail and would not be attributed directly to the proposed trail improvements.

Traffic Impact Studies are typically required for land development projects where permanent and daily traffic is generated, which may impact the local circulation system during the morning (AM) and afternoon (PM) peak hour periods. As stated at the bottom of page 4-102 of the IS/MND,

The majority of Park to Playa Trail users would be driving to and from the proposed trail as they do now. Implementation of the proposed project is not anticipated to result in a substantive increase in vehicle trips during the AM and PM peak hours. Rather, most of the new vehicle trips to and from the Park to Playa Trail would occur before or after peak hours or on weekends, as occurs in the existing condition.

The proposed project would generate minimal weekday peak hour trips when the circulation system is peaking. Since the majority of vehicle trips associated with the proposed project would occur during the weekend when the circulation system has lower baseline traffic volumes, these trips would have no direct effect on worker commute trips during the AM and PM peak hours on weekdays. As noted in the third paragraph on page 4-103 of the IS/MND, "Project-generated vehicle trips would represent a small percentage of existing traffic volumes in the project area that would not occur during peak hours and would not result in substantial traffic congestion". As such, a traffic impact study was not considered necessary.

The Baldwin Hills CSD EIR evaluates the potential traffic impacts associated with future expansion of oil field operations in the Inglewood Oilfield. The Baldwin Hills CSD EIR includes intersection analyses to consider transportation impacts associated with 372 net new daily trips and associated peak hour trips during weekday conditions. A total of four intersections and three freeway locations are studied in the Baldwin Hills CSD EIR. Since the Baldwin Hills CSD is effectively a land development project with notable increases in weekday peak hour trips, the traffic analysis was required. The proposed Park to Playa Trail is forecasted to generate minimal weekday peak hour trips; therefore, a traffic study is not necessary and the analysis is in scale with the project's potential to affect the circulation system.



As noted in the second paragraph under d) on page 4-104 of the IS/MND,

Crosswalks, sidewalks, and trail crossings on public rights-of-way would be signed and improved in accordance with the California Manual on Uniform Traffic Control Devices (MUTCD), as specified in RR 4.16-2. The California MUTCD adopts uniform standards and specifications for traffic control devices, including all signs, signals, markings, and other devices used to regulate, warn, or guide traffic on streets or highways, pedestrian walkways, and bikeways. The standards include temporary traffic controls during construction; traffic controls for school areas; and traffic controls for highway-rail/light rail transit grade crossings. In addition, warning and traffic safety signs would be provided throughout the proposed trail alignment to promote safety for trail users. The same standards have been used throughout the County, region and State to promote vehicular traffic flows while protecting pedestrian safety. Therefore, a substantial increase in traffic hazards would not be created by the Project.

Through project design and wayfinding signs, bicycle and pedestrian trail users will be guided to City and County-managed intersections for the crossing of local roadways. As noted under d) on page 4-104 in the IS/MND, intersection control measures utilized to facilitate pedestrian and bicycle user crossing of local roadways are standardized traffic engineering practices, and the project proposes improvements in accordance with the California MUTCD. The design and configuration of traffic controls at intersections and crossings are reviewed and approved by public works/engineering staff. Standardized traffic engineering controls are proposed at the Five Points Intersection, as well as other intersection crossings associated with the project. These plans will be reviewed and approved by the County prior to construction.

See Response I1 above regarding the preparation of an EIR. Section 15004(b) of the CEQA Guidelines requires preparation of the environmental document "as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment". With the trail alignment and trail improvements set, the BHRCA initiated preparation of the IS/MND. Technical studies have been prepared to analyze the project's impacts on biological resources and cultural resources. Model runs were made for air quality and greenhouse gases. These are provided as appendices to the IS/MND. For other issues, technical studies were not considered necessary or it was assumed that impacts would occur and mitigation was provided. Thus, while the construction plans and details for the project have not been finalized, these plans would comply with the RRs and MMs outlined in the IS/MND, and would avoid or reduce potential project impacts to less than significant levels.

**Comment I7:**

4. **The IS/MND repeatedly mis-cites the IOF in the Baldwin Hills Park Master Plan as designated “open space,” which it is not.** That characterization is and has long been erroneous – the IOF is not open space and the County, State and all municipal entities should discontinue any further use of the erroneous reference in the IS/MND and in any and all related Baldwin Hills Regional Conservation Authority (BHRCA) materials and website content.

**Response I7:** The IS/MND discusses past planning efforts in the Baldwin Hills, including preparation of the Baldwin Hills Master Plan and its proposal for a large urban park in the Baldwin Hills. The IS/MND also discusses the consistency of the Park to Playa Trail to this Master Plan. The IS/MND does not state that the Inglewood Oilfield is designated as open space in the Master Plan.

References to open space are collectively made to areas where no urban development (i.e., buildings and roads) or land improvements are present or are planned and areas where no formal land uses have been assigned. Open space does not refer to adjacent oil and gas production areas or underlying oil, gas, or other mineral resources that may be subject to past or future extraction. The term is also not meant to confer a permanent land use or designation to any area.

**Comment I8:**

5. **The IS/MND is defective in that it fails to include any actual trail use estimations and, because of the lack of the required traffic studies, user safety at several intersections - specifically 5 points - is actually ignored and errantly claimed to have less than significant impact.** This failure and related failures regarding overall projected trail-way usage plagues the entire IS/MND because, through omission and the failure to provide this key information to the County and public, the report improperly seeks to circumvent EIR and related traffic/usage study and analysis by leaving the erroneous impression that there are no traffic and usage issues to reveal and address. This problem is also underscored by, as discussed below, a reference to traffic patterns on a 10 mile stretch of La Cienega and not, as is most telling and appropriate, the actual usage and density of traffic on the 2-3 mile stretch of La Cienega from La Tiejra to Rodeo. Mr. David McNeil, Executive Director of the Baldwin Hills Conservancy even conceded that a traffic study is warranted as part of a proper due diligence of these issues ( in a discussion with me at the February 7, 2013 water board meeting) and that BHRCA could and/or would pay for it. These omissions, combined with the additional, substantive omissions cited in Paragraphs 1-3 above, demonstrate what we find to be a deliberate effort to avoid the evaluations required by law-evaluations which when based on the required and proper studies and discussions of the statutory

criteria and that addressed above will require the Park to Playa trail-way across and immediately adjacent to the IOF to be scrapped and/or substantially re-designed. There is no doubt that the IS/MND does not represent a full and forthright identification, study and discussion of the mitigation issues required by law to be substantively and thoroughly discussed and considered before embarking upon a project of this nature.

**Response I8:** See Responses I5 and I6 above for a discussion on the need for a traffic study. See Response I4 for a discussion of projections of trail users. See Response I1 above regarding the preparation of an EIR.

The Baldwin Hills Conservancy is neither the Lead Agency nor a responsible agency for this project and thus, Mr. McNeil would not be a decision-maker on the project.

**Comment I9:**

6. **The IS/MND mis-cites the operational control of the IOF and contains other notable misunderstandings regarding the oil field operation.** For example, portions of Segment C - Blair Hills Corridor of the Park to Playa Trail - is operated by PXP *not BHRCA* as stated in the document. There are active oil and water injection wells - both storm water basins and pipelines. This property is leased for drilling and redrilling of wells in accordance with the oil and gas leases governing the surface rights and mineral rights of this property. The IS/MND ignores these facts along with Department of Oil, Gas, and Geothermal Resources (DOGGR) regulations for drilling and general safety related operations. Segment 2.3.3 of the trail on page 2-5 also includes a flood control basin that is governed by the Regional Water Quality Control Board, is not properly described in the document, may well result in flooding and thereby necessitating the relocation of the trail-way in any case. The design makes no allocation and the IS/MND contains no discussion regarding safety measures for homeland security and/or law enforcement,<sup>1</sup> fire access and control or other related measures to protect the oil and gas operations and equipment where the trail is designed to run along a 1,000 acre oil field perimeter. Instead of embracing a known mineral resource, Park to Playa disregards its value and provides no suggestions to protect it in this document.

---

<sup>1</sup> At the 1/16/2013 general public meeting by BHRCA regarding the adoption of the Mitigated Negative Declaration, the representative from Parks stated that the trail would be overseen by the same park rangers with assistance from various police entities. He admitted that they would not be in place on the trail and did not know yet how they would actually police it.

**Response I9:** Table 2-1 of the IS/MND lists the BHRCA as the owner and operator of Segment C since there is no current use on this BHRCA property. This does not refer to the BHRCA as the operator of the Inglewood Oilfield for any surface or subsurface oil and gas exploration, production, processing, and

associated activities. Also, the project does not propose any oil and gas exploration, production, processing and associated activity in the Inglewood Oilfield. To avoid this confusion, in Table 2-1 of the IS/MND, the column heading "Operator" has been replaced with "Management Entity". While the PXP has a lease for drilling and re-drilling, it has currently ceased drilling operations within the jurisdictional boundaries of the City of Culver City, which is consistent with the description of past drilling operations in Segment C.

The DOGGR regulations are discussed in Section 4.8, Hazards and Hazardous Materials, and RR 4.8-3 (on page 4-64) requires project compliance with pertinent DOGGR regulations.

The Lloyd Basin is located outside Segment C, and no improvements are proposed in the Lloyd Basin or on the parcel containing the basin. The preliminary alignment of the proposed trail would pass through a detention basin on the western section of Segment C. At the eastern section, the proposed trail would go over an underground pipe north of a storm drain inlet but would not go into the Lloyd Basin or the drainage channel downstream of the basin. Although the proposed trail along the La Cienega ramp would pass near the northeastern corner of the basin, it would be located on public right-of-way. Page 4-69 of the IS/MND discusses flood hazards associated with the basin. As shown in Exhibit 4-16, these hazards do not extend to the trail alignment.

Fire hazards are discussed in Section 4.8, Hazards and Hazardous Materials, and police protection services are addressed in Section 4.15, Public Services. The trail is not expected to pose homeland security issues as it is not a critical facility and is not likely to be occupied by large numbers of people at any one time and throughout its alignment. Access to the nearby oil and gas drilling operations would be blocked by existing and proposed fences along the trail. See Response 12 regarding existing and proposed fencing. Section 4.15.1, Police Protection Services, on page 4-92 discusses police protection services, and impacts on these services are discussed on pages 4-93 and 4-94.

The Park to Playa Trail does not propose any oil and gas exploration, production, processing, and/or associated activity in the Inglewood Oilfield. The dirt access road in Segment C that serves the oil and gas operations located to the south of Segment C will be relocated and fenced from the proposed trail in accordance with DOGGR and PXP requirements. No direct access from the trail to the oil and gas operations is proposed.

There are existing trails in Segments E and H that would be designated as the Park to Playa Trail. These trails are located adjacent to oil and gas operations and have not posed any major threats to homeland security, nor have they been the source of major or significant crime, fire, or other hazards to the oil and gas operations. Thus, the preliminary alignment of the proposed trail in Segment C is also not expected to pose fire, crime, or homeland security hazards. By precluding future urban development in Segment C, the BHRCA would be promoting continued oil and gas operations at the Inglewood Oilfield.



**Comment I10:**

7. **There are several references to the BHRCA adopted Baldwin Hills Park Master Plan (Section 2.2 Project Background, page 2-1) which proposes a two square mile urban park; that reference is misleading and potentially exposes the County to liability for inverse condemnation.** This language is improper and misleads the public to believe that the County has effectively engaged in an inverse condemnation of oil field property, in whole or in part, and/or that the County has any rights to convert same into a park. The reference also perpetuates the false characterization that the entire IOF is designated “open space,” **which it is not**. This material error is not limited to the wrongful “open space” designation. For example, Section 4.5.1 Environmental Setting (page 4-39) mistakenly asserts that the Baldwin Hills Master Plan states that the historic home of the Chandler family is located on the western ridgeline of the Kenneth Hahn State Recreational Area (KHSRA). This house is on private property and has no affiliation with KHSRA and is not located within the KHSRA.

**Response I10:** Page 2-1 of the IS/MND discusses the historical background associated with the preparation of various plans for the Baldwin Hills, but does not state that the BHRCA or the County adopted the Baldwin Hills Master Plan. The discussion also does not talk about the County’s intent to implement the Master Plan or condemn private property for park use. Rather, it only states that the State Department of Parks and Recreation and the Baldwin Hills Conservancy adopted the Master Plan, which proposes an urban park in the Baldwin Hills, but does not identify the oilfield as open space. See Response I7.

The discussion in the sixth paragraph on page 4-40 is derived from the Baldwin Hills Master Plan and states the historic home of the Chandler family is on the western ridgeline. The phrase “of the KHSRA” has been deleted.

**Comment I11:**

8. **The IS/MND is manifestly deficient in its failure to quantify, with any traffic and/or usage studies, the expected usage of the trails.** In addition to the points raised in Paragraph 5 above, the IS/MND is devoid of any substantive and meaningful discussion of projected usage and traffic/density studies and risks. For example, the actual and/or projected numbers of users - walkers, joggers, hikers,

bicyclists, leashed-dog walkers, roller bladers, and skate boarders – and provide any meaningful exhibits or breakdown (Section 2.3 project Characteristics pg 2-3) to support the under-reported figures suggested therein. For example, though the proposed trail crosses several public streets, there are no traffic studies provided and available EIR data for Portion C is not utilized. This is a major disregard for public safety. Five points - the intersection where La Brea, Overhill and Stocker meets - is already a major pedestrian issue. With the addition of an unknown number of various types of trail users, the public safety is a significant issue that needs to be but is not addressed. At the public meeting held on January 30, 2013, references were made by several officials from various agencies that the five points intersection would be addressed with walking bridges through the Los Angeles County 2035 General Plan. An approved, adopted Department of Public Works plan should have been attached to justify the consideration for omitting traffic studies, but it was not. Since the General Plan has yet to be approved and adopted, it is safe to assume that no such mitigation exists and it is incumbent upon the County to specifically address these issues now. The next portion of the trail between Sections C & D crosses over the La Cienega overpass. There is no traffic study attached. The CSD EIR documents a far higher specific usage for La Cienega between Stocker and Jefferson Boulevard than that supplied in the study; it is inexcusable that the IS/MND omits this key, public safety-related information when same was calculated just a few years ago and is part of the public record. The IS/MND fails to consider the multiple types of users on the limited overpass crossing with morning and evening traffic in full swing. In a one hour period of morning traffic during the week, 53 cars used the overpass - almost 1 per minute. Trail user safety, particularly in the vicinity of vehicles, must be studied further with proper documentation so that the appropriate agencies can weigh in on the subject and so that the IOF landowners and the public can assess the risks and dangers and overall propriety of the mitigation measures. The foregoing are not minutiae but just a handful of the examples of glaring, material omissions in the IS/MND which cannot be allowed to pass and which do not comply with governing law.

**Response I11:** Refer to Response I6 for a discussion on the need for a traffic study. See Response I4 for a discussion of projections of trail users.

The limited number of additional pedestrians that are forecasted to cross the Five Points Intersection during the weekday peak hour would not exceed traffic capacity of the intersection, which accommodates much higher traffic volumes during weekday peak hour conditions than during the weekends or after weekday peak hours when most trail users would be at this location. Therefore, construction of a pedestrian bridge at the Five Points Intersection is not required to accommodate additional trail user activity that may be generated by the project.

The preliminary alignment of the proposed trail would be located along the southbound off-ramp that leads to the bridge over La Cienega Boulevard. However, it would not be located along the main travel lanes on La Cienega Boulevard so as to directly affect traffic flows on this roadway. Trail users crossing the bridge at both ends would not be at high volumes or during peak hours, so as to affect level of service at the La Cienega bridge.

The design of the La Cienega bridge crossing has been determined to be a safety concern, which will be addressed during the final design of Segment C, in coordination with Culver City and Los Angeles County engineering staff, to ensure that the crossing meets safety standards. Also, the feasibility of a pedestrian bridge over La Cienega Boulevard is being re-evaluated.

The proposed crossings at the La Cienega bridge and at the Five Points Intersection do not entail traversing a steep slope. As the proposed trail descends along the La Cienega southbound off-ramp, it will feature ADA-compliant grades for recreational trails with respect to gradient and all other trail design considerations, and will have emergency access from several locations. The trail will meet all standards for a typical multi-use public recreational trail, including those in the Los Angeles County Trail Manual. Emergency access to the trail would be provided by travel lanes on La Cienega Boulevard (southbound to the trail at the off-ramp or northbound to the off-ramp and over the bridge).

Compliance with RRs 4.16-1 and 4.16-2 prevent public safety hazards to vehicles, pedestrians, trail users, and other individuals that may be present along the proposed Park to Playa Trail.

See Response I3 on why the Baldwin Hills CSD EIR was not referenced in the IS/MND.

Please note that the alignment for the proposed trail in Segment C (Blair Hills Trail) is preliminary. The BHRCA and the County will continue to work with adjacent residents, property owners, the oilfield operator, the City of Culver City, and other stakeholders to address their concerns as the trail design for this segment is better defined and finalized. At that time, the proposed trail in Segment C will be subject to additional environmental analysis and review.

**Comment I12:**

It appears that in the continued effort to rush the Park to Playa Trail concept through the evaluation and approval process, many important details are disregarded. It is time to stop the rush and accurately complete this process properly so public safety, mineral resources, and other property rights and interests are properly protected. All related parties including but limited to: Los Angeles County, Culver City and the State of California should demand that this process be given the time and attention it deserves. The completion of an EIR is a necessary requirement for this project as are full and substantive studies and discussions concerning the matters discussed above.

**Response I12:** The approval of the project by the BHRCA is independent of the approval processes of other public agencies, including the County of Los Angeles, the City of Culver City, and the State. See Response I1 above regarding the preparation of an EIR.



**Comment I13:**

As stated in the public hearing, I respectfully request and expect a letter of response to address all the issues included in this letter.

**Response I13:** In accordance with CEQA, the Lead Agency is not required to respond to comments on the IS/MND or to mail responses back to the commenting agency. The BHRCA has prepared these responses to assist the agency in considering the comments received and responses to these comments prior to making a decision on the project. However, as a courtesy, responses to the Cone Fee Trust comment letter have been sent to Liz Gosnell at lizkibbeygosnell@gmail.com & 4gosnell@charter.net on May 17, 2013.



**Comment Letter J: County of Los Angeles Fire Department  
(February 5, 2013)**

**Comment J1:**

**PLANNING DIVISION:**

**4.15 PUBLIC SERVICES**

**4.15.1 ENVIRONMENTAL SETTING**

**Fire Protection Services**

The paragraph should be corrected as follows:

The Los Angeles County Fire Department, the Los Angeles City Fire Department and the Culver City Fire Department provide fire protection services in the project area through a Mutual Aid Agreement. The nearest Los Angeles County Fire Station is Station 172 58, located at 840 Centinela Avenue in Inglewood 5757 S. Fairfax Avenue in Unincorporated Los Angeles, approximately 2.6 mile south of the KHSRA. The nearest Los Angeles City Fire Station is Station 94, located at 4470 Coliseum Street, approximately 0.85 mile northeast of the KHSRA. The main station for the Culver City Fire Department is located at 9770 Culver Boulevard, approximately 0.6 mile west of Culver City Park.

**Response J1:** This change has been made to the first paragraph on page 4-92 of the IS/MND.

**Comment J2:**

**LAND DEVELOPMENT UNIT:**

1. The Land Development Unit does not have any comments or requirements at this time; however, additional development will require compliance of all applicable codes, regulations, policies and ordinances.

**Response J2:** Comment noted. No response required.

**Comment J3:**

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

**Response J3:** Comment noted. No response required.

**Comment J4:**

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. A soil management plan (SMP), and a health and safety plan (HSP) is required for this project. Employees working at this project must be trained and familiar with the SMP & HSP. SMP should be used to properly address management of any contaminated soil encountered during the project activities. HSP should be used to minimize workers exposure to potential contaminants. All excavated soil must be sampled and analyzed for contaminants of concerns prior to disposal according to local and State requirements.

**Response J4:** RR 4.8-1 requires project compliance with existing hazardous materials regulations, including the Certified Unified Program Agency regulations, which are implemented by the County Fire Department. MM 4.8-1 outlines the soil management practices that would be implemented to address the management and disposal of contaminated soils. As part of RR 4.8-1 compliance, a soil management plan and a health and safety plan will be submitted to the County Fire Department, which will contain the measures included under MM 4.8-1.

**Comment Letter K: Governor's Office of Planning and Research  
(February 15, 2013)**

**Comment K1:**

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 14, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

**Response K1:** The DTSC comments and responses to these comments are provided above under Comment Letter G.

**Comment K2:**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

**Response K2:** Comment noted. No response is required.

## 6.0 CHANGES TO THE IS/MND

The following changes to the IS/MND have been made based on the comments and the responses to the comments:

- A statement has been added at various locations throughout the IS/MND (including pages 1-2, 3-3, and 4-1) indicating that the proposed trail in Segment C is preliminary and subject to future change and refinement; that additional environmental analysis and review would be provided when the proposed trail in Segment C is further refined.
- Section 1.4, Public Comments, has been added on page 1-18 to discuss the meetings and comments received during the public review period and the BHRCA's intent to continue working with property owners, residents, the oilfield operator, and the City of Culver City on the refinement of the trail alignment and design for Segment C.
- The term "oil and gas production" or "oil drilling operations" has been replaced with the term "oil and gas exploration, production, processing, and associated activities" on pages 2-3, 2-5, 2-7, 3-3, 4-1, 4-40, 4-56, 4-57, 4-60, 4-62, 4-63, 4-68, 4-69, 4-75, 4-79, 4-82, and 4-83.
- The word "operator" on page 2-3 has been revised to "management entity". On page 2-4, Table 2-1 has been revised to replace the column heading "Operator" with "Management Entity".
- The second paragraph under Section 2.3.6 on page 2-6 has been revised to state that the Los Angeles Department of Water and Power (LADWP) owns the transmission lines running through the KHSRA. Similarly, the first sentence on page 2-7 has been revised to indicate that the transmission lines in Segment G are LADWP transmission lines.
- The third bullet on page 3-9 has been revised to read LADWP instead of SCE. The last sentence on page 4-58 of the IS/MND has been revised to refer to coordination with the LADWP.
- References to the SCE right-of-way in the second paragraph under Section 4.11 on page 4-75 have been revised from SCE to LADWP. References to SCE power lines in various exhibits, including Exhibits 2-7, 2-9, 2-10, 3-4, 3-6, 3-7, and 4-7, have been revised to state LADWP.
- The first sentence of the third paragraph under Segment C on page 3-3 has been revised as read: "The existing oil and gas operations dirt access road serving the ~~oil operations~~ active Inglewood Oilfield would need to be relocated south of....."
- The trail alignment for Segment C is preliminary, as noted on Exhibit 3-3, but the exhibit has been revised to show the location of the shade structure at the interpretive node and to eliminate the proposed revegetation along the drainage channel. The location of an existing fence has also been added and the proposed trail along the La Cienega ramp has been noted to run along the public right-of-way.
- With the decrease in revegetation area, the fourth paragraph under b) on page 4-72 has been revised from 210,000 square feet to 204,000 square feet; water use has been revised from 4.6 million gallons to 4.44 million gallons; and water demand percentages have been changed from 0.02 and 0.4 to 0.003 to 0.410 percent. Also, the second paragraph under b) and d) on page 4-111 has been revised from 210,000 square feet to 204,000 square feet; water use has been revised from 4.6 million gallons to 4.44 million gallons; and water demand has been changed from 0.42 to 0.41 percent.



- The sixth paragraph on page 4-40 has been revised to delete the phrase “of the KHSRA” from the last sentence.
- The second sentence under c) on page 4-48 has been revised to delete the reference to the “Five Points intersection” and a sentence added after this to read: Subsidence was also observed near the Five Points Intersection.
- The last sentence of the first paragraph under c) on page 4-49 has been deleted. “However, additional subsidence may have occurred in the northwestern section of the oilfield where oil drilling is currently most intensive.”
- In the third sentence of the third paragraph under Oil Drilling Operations on page 4-57, the phrase “located north and northwest of the Baldwin Hills” has been added after the phrase “ground surface for the Silverado Aquifer”.
- The second sentence in the fourth paragraph on page 4-60 has been revised to read: “... of the property away from existing oil drilling .....
- The second sentence in the fourth paragraph on page 4-60 has been revised to delete the word “arsenic”.
- The first sentence of the third paragraph under Drainage Patterns on page 4-68 has been revised to read: “A portion of the Inglewood Oilfield south of Segment C....”
- The first sentence under the Groundwater discussion on page 4-69 has been revised to replace the word “overlie” with “is located at the boundaries of three groundwater basins within the Coastal Plain.....”.
- The end of the second sentence in the first paragraph under the Groundwater discussion on page 4-69 of the IS/MND has also been revised to read: “... have restricted groundwater movement between the basins”.
- The third sentence in the second paragraph under the Groundwater discussion on page 4-69 of the IS/MND has been revised to read: “The Silverado aquifer located north and northwest of the Baldwin Hills is a potential drinking water source, but is located more than 200 feet below the ground surface”.
- The first sentence under b) on page 4-71 has been revised to replace the word “overlies” with “is located at the boundaries of”
- The first paragraph on page 4-82 has been revised to state that the Inglewood Oilfield covers approximately 1,000 acres instead of 950 acres.
- The first sentence in the second paragraph under Oil Resources on page 4-82 has been revised to replace the term “near” with “within 100 feet of”.
- The third sentence under 4.12.2 a) on page 4-82 has been revised to read: “The dirt roads in this area would remain in place or be relocated to allow future oil drilling activities”.
- The first paragraph on page 4-92 of the IS/MND has been revised to read:

The Los Angeles County Fire Department, the Los Angeles City Fire Department, and the Culver City Fire Department provide fire protection services in the project area through a Mutual Aid Agreement. The nearest Los Angeles County Fire Station is Station 58, located at 5757 South Fairfax Avenue in unincorporated Los Angeles, approximately 2.0 miles south of the KHSRA. The nearest Los Angeles City Fire Station is Station 94, located at 4470 Coliseum Street, approximately 0.85 mile northeast of the KHSRA. The

main station for the Culver City Fire Department is located at 9770 Culver Boulevard, approximately 0.6 mile west of Culver City Park.

- A sentence has been added at the start of the fourth paragraph under f, g) on page 4-110: The handling of hazardous wastes and contaminated soils is addressed in Section 3.8, Hazards and Hazardous Materials.

These revisions do not change the analysis or conclusions of the IS/MND. Based on the analysis in the IS/MND, the comments received, and the responses to these comments, no substantial new environmental issues have been raised that have not been adequately addressed in the IS/MND. Also, no changes to the analysis or conclusions of the IS/MND are necessary based on the comments, the responses to the comments, and the revisions to the IS/MND.

**ATTACHMENT A**  
**COMMENT LETTERS**



# COMMENT CARD

Public Meeting  
Park to Playa Trail  
January 30, 2013  
6:30 PM

Comment 5

KHSRA Community Meeting Room

Comments:

*Buffer areas -*

*Between the proposed trails and property lines there should be a buffer of at least 25' feet to protect property owners*

*No future entrance to the County owned future park located on Stoneview Dr*

Name:

*DOROTHY STEINER*

Address:

*5964 STONEVIEW DR*

City/State/ZIP:

*CULVER CITY, CA 90232 - 3017*

*This was a promise made by the county people when meetings were held. Only entrance would be on Stoneview Dr*  
*310-839-3477*

You may submit your comments at this meeting using this card, or by email/mail to:

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

For more information or questions regarding the project, you may contact:

Ms. Ana Petric  
Deputy Chief of Urban Projects and Watershed Planning Division  
Los Angeles River Center and Gardens  
570 West Avenue 26, Suite 100  
Los Angeles, California 90065  
ana.petric@mrca.ca.gov

Comments on the Initial Study/Mitigated Negative Declaration will be accepted until **Monday, February 18, 2013 at 5:00 P.M.**



Due Feb 18<sup>th</sup>



### COMMENT CARD

Public Meeting  
Park to Playa Trail  
January 30, 2013  
6:30 PM

Comment 6

KHSRA Community Meeting Room

Comments:

I am not on board with this whole "trail" thing. I mean seriously, I don't want 24/7 noise while I'm trying to get my sleep. School is hard, and I need my sleep. I don't care what you people say, I like my backyard just the way it is. NOISLESS I don't care when the noise is, NO NOISE or anything

else. Thank you for your cooperation. P.S I don't want a bunch of people I don't know in my backyard.

Name:

Conner Klemen Age: 11

Address:

5912 Stoneview Dr.

City/State/ZIP:

Culver City 90232

You may submit your comments at this meeting using this card, or by email/mail to:

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

For more information or questions regarding the project, you may contact:

Ms. Ana Petric  
Deputy Chief of Urban Projects and Watershed Planning Division  
Los Angeles River Center and Gardens  
570 West Avenue 26, Suite 100  
Los Angeles, California 90065  
ana.petric@mrca.ca.gov

Comments on the Initial Study/Mitigated Negative Declaration will be accepted until **Monday, February 18, 2013 at 5:00 P.M.**

From: Dubiel, Matthew [mailto:MDUBIEL@dpw.lacounty.gov]  
Sent: Monday, January 14, 2013 7:50 AM  
To: 'ana.petric@mrca.ca.gov'; 'gregmaher@altaplanning.com'  
Cc: Nyivih, Anthony; Burger, Steve; Pachano, Fabrizio; Cruz, Ruben; 'kkatona@bos.lacounty.gov'  
Subject: Park to Playa Trail - Public Works Draft IS/MND Comments

Dear Ms. Petric, Mr. Maher:

Below please find Public Works comments on the Draft IS/MND for the proposed Park to Playa Trail project. Please note that these are comments on the environmental document only and according to our Division Chief, Mr. Anthony Nyivih, further comments on the site plan itself will be forthcoming. Mr. Nyivih will be calling you this afternoon to discuss this matter further. If you have any questions please feel free to contact our offices at (626) 458-4921.

Thank you.

### **DRAFT INITIAL STUDY (IS)/ MITIGATED NEGATIVE DECLARATION (MND) PARK TO PLAYA TRAIL**

Thank you for the opportunity to review the IS/MND for the Park to Playa project. The project consists of a designating a trail as the Park to Playa Trail that would lead from the existing parks in the Baldwin Hills area to the Pacific coast through the Ballona Creek Bike Path and Marvin Braude Bike Path. The proposed trail would include improvements to existing formal and informal trails, as well as the development of new trails in the Baldwin Hills area. These improvements would involve resurfacing, widening, and realignment of existing trails; the provision of fencing, way-finding signs, trailhead facilities (i.e., an information kiosk, shade structures, benches, bike racks, and trash cans); native plant landscaping and habitat restoration of disturbed areas adjacent to the trail; reconstruction of sidewalks, crosswalks, and bike lanes; and drainage channel restoration. These improvements would provide trail connections from the Ruben Ingold Park, Norman O. Houston Park, Kenneth Hahn State Recreation Area (KHSRA), Baldwin Hills Scenic Overlook, Blair Hills Park, and the Culver City Park to the Ballona Creek Bike Path.

Public Works has reviewed the Initial Study/Mitigated Negative Declaration and concur that a MND is the appropriate document. It is suggested however, that if reclaimed water will be available at the site for landscaping purposes it be properly disclosed within the document.

A1

In addition, we would request any addendums or any future plans/documents associated with this project be submitted to Public Works.

If you have any questions related to the environmental document, please contact Ruben Cruz at (626) 458-4910 or [rcruz@dpw.lacounty.gov](mailto:rcruz@dpw.lacounty.gov).

Matthew Dubiel, P.E.  
County of Los Angeles Department of Public Works  
Land Development Division, Subdivision Mapping Section,  
CUP/CEQA/B&T Planning Unit  
☎ (626) 458-4921 📠 (626) 458-4949  
[Please click here to take our customer service survey](#)



From: CAROLYN KLEMER [mailto:cklemer@msn.com]  
Sent: Tuesday, January 22, 2013 12:49 PM  
To: Hayden Sohm  
Subject: FW: Park To Playa Environmental Impact Statement

Mr. Sohm,

I am a resident of Blair Hills and received this report over the weekend. My residence is on Stoneview Drive and backs up to the oil fields, the exact address is 5912. This is the first time I was able to see a map with property pictures. It clearly shows that the trail seems to meander a bit, mostly away from homes. For whatever reason, the trails takes a sharp turn towards my property and seems to go up to my property line. Please help me understand why this is necessary. I went to some of the meetings and we were assured that efforts would be made to keep the trail away from homes and that privacy measures would be taken. You can plant a hedge as tall as you like, but if the trail is right at my property line, I'm going to hear everything and see more than I would like. With that kind of proximity safety is always a concern, I have an elementary school age son at home with me too.

B1

I would like to understand how this can be changed. I am aware that you have been at some of our meetings and have been involved in mitigating some of Blair Hills concerns. I hope that you can refer me and/or carry my concerns and request to those that need to hear it to make changes.

I hope to hear from you soon, I am sure you can appreciate my concern. I can be reached at this e-mail address or by phone at 310-200-9113.

---

From: jonm@vi-i.com  
To: list@blairhills.org  
Subject: Park To Playa Environmental Impact Statement  
Date: Sun, 20 Jan 2013 10:52:38 -0800

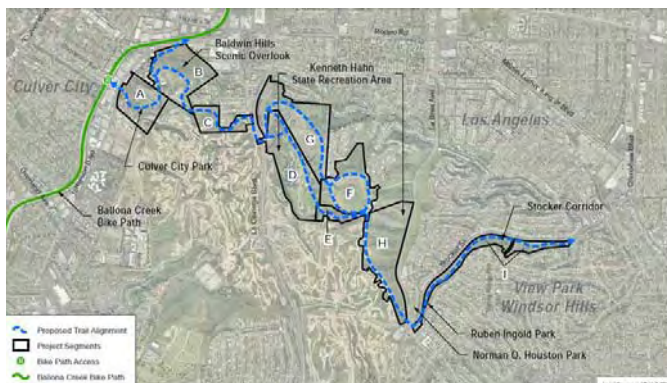
I have received the notice of "intent to adopt a mitigated negative declaration for the environmental impact statement" [for the Park To Playa Trail] (this means that they found significant impact but have specified mitigation to be carried out that reduces the impact to the non-significant level).

Here is the link to the mitigated impact declaration:

[Park To Playa Trail Initial Study/Mitigated Negative Declaration](#)

I also have a CD of this report. Contact me if you want to borrow it.

Here is a map from this document that may be of interest. Blair Hills is directly below the text "Baldwin Hills Scenic Overlook".



Subject: RE: Park To Playa Environmental Impact Statement

Date: Wed, 23 Jan 2013 06:35:01 -0800

From: [hsohm@parks.lacounty.gov](mailto:hsohm@parks.lacounty.gov)

To: [cklemer@msn.com](mailto:cklemer@msn.com)

CC: [rwilliams@parks.lacounty.gov](mailto:rwilliams@parks.lacounty.gov); [ana.petric@mrca.ca.gov](mailto:ana.petric@mrca.ca.gov); [dlacroix@parks.lacounty.gov](mailto:dlacroix@parks.lacounty.gov); [KKatona@bos.lacounty.gov](mailto:KKatona@bos.lacounty.gov); [smcadory@parks.lacounty.gov](mailto:smcadory@parks.lacounty.gov); [jbok@parks.lacounty.gov](mailto:jbok@parks.lacounty.gov); [fmoreno@parks.lacounty.gov](mailto:fmoreno@parks.lacounty.gov); [KKing@parks.lacounty.gov](mailto:KKing@parks.lacounty.gov); [jwicker@parks.lacounty.gov](mailto:jwicker@parks.lacounty.gov); [rquiney@parks.lacounty.gov](mailto:rquiney@parks.lacounty.gov)

Dear Ms. Klemer:

It looks like your residence is about 4 doors down from the abandoned school/future park site according to the attached aerial photograph.

I understand your concern and it is one that we have addressed and heard during the previous Park to Playa public meetings. The image that was attached to the e-mail forwarded to you does not portray the exact trail alignment through this section (adjacent to your home). This is because the image is meant to provide a general alignment of the overall proposed trail.

The trail route through this section has been modified to respond to concerns and avoid conflict: After hearing the concerns from the community, we went back to the design and pulled back the trail as far as we possibly can from the homes. Additionally, we plan to replace the existing chain link fence between the homes and the BHRCA property with a nicer/decorative fence and will add a large landscaping buffer between the trail and the new fence/homes (as per resident requests). Since we moved the trail further way, it required us to re-route PXP's existing road more south (away from the homes) and added a barrier fence between the trail and the new road. We still need official permission from PXP to re-route their road, but we have a verbal/conceptual OK from them.

I presume the "sharp turn" you refers to is where the trail crosses the La Cienega Bridge and moves north to get to the BHRCA property. This is necessary because this is the property that is in public ownership (by BHRCA). We cannot route the trail further south (below the BHRCA property) because this is in private ownership and PXP is leasing the land for oil drilling purposes. Additionally, we have to route the trail to the north of the BHRCA property because there is a "pond" and "spillway" that would prevent us from rerouting the trail anywhere else.

There is a public meeting on January 30<sup>th</sup> where you may be able to get further information on the trail. The meeting will be held at the conference room at our park office within Hahn Park. You can also provide formal written comments regarding the project. These comments should be sent to:

Ms. Josephine Alido  
BonTerra Consulting  
225 South Lake Avenue, Suite 1000  
Pasadena, California 91101  
[jalido@bonterraconsulting.com](mailto:jalido@bonterraconsulting.com)

Thanks for taking the time to comment on the project- I will be attending the meeting on January 30<sup>th</sup>.

Best Regards  
Hayden Sohm

**Hayden W. Sohm**  
**Deputy Director**  
**L.A. County Parks**  
**626-369-8693**  
**cell: 626-674-5885**

---



----- Original Message -----

**From:** [CAROLYN KLEMER](#)

**To:** [Hayden Sohm](#)

**Cc:** [rwilliams@parks.lacounty.gov](#) ; [ana.petric@mrca.ca.gov](#) ; [dlacroix@parks.lacounty.gov](#) ;  
[kkatona@bos.lacounty.gov](#) ; [smcadory@parks.lacounty.gov](#) ; [jbok@parks.lacounty.gov](#) ;  
[fmoreno@parks.lacounty.gov](#) ; [kking@parks.lacounty.gov](#) ; [jwicker@parks.lacounty.gov](#) ;  
[rquiney@parks.lacounty.gov](#) ; [Bobbi Gold](#)

**Sent:** Wednesday, January 23, 2013 9:09 AM

**Subject:** RE: Park To Playa Environmental Impact Statement

Mr. Sohm,

Thank you for the information below including the meeting date, I have an appointment that night that I will reschedule.

The sharp turn is more about the trail going up to my property line and not further down near La Cienega. Perhaps I should have said 'curved' into my property line, regardless the drawing indicated that it hit the property line as I understood it. I am glad to hear that it may not be an accurate representation of the actual trail. Scale and distance are hard to understand on the map provided. I'm hopeful once that is better understood there will not be an issue.

B2

Once again I appreciate your assistance in this matter and look forward to seeing you at the meeting.

---

**Josephine Alido - Fwd: Park To Playa Trail - Blair Hills**

---

**From:** Josephine Alido  
**To:** Josephine Alido  
**Date:** 5/15/2013 1:07 PM  
**Subject:** Fwd: Park To Playa Trail - Blair Hills

---

>>> CAROLYN KLEMER <cklemer@msn.com> 2/17/2013 9:48 PM >>>  
Ms. Alido,

Although I attended the meeting on January 30th, I would like to submit my comments in writing. I live on Stoneview Drive and my property backs up to the trail. I have three concerns: privacy, noise and safety. To that end I request:

1. The oil fields don't bring people behind our houses. This trail introduces a whole new element of people and therefore potential security issues. As such, security fencing should be put between the trail and the houses on Stoneview.
2. Although there is a road behind our houses, I have never once seen nor heard a vehicle on that road. To preserve the quiet and privacy, keep the trail at least 25 feet from the houses to create some buffer. Also, please use soundproofing plants or consider a brick wall as the security fence to both secure and create privacy. The plants shown in the renderings, while attractive, won't create much of a sound barrier. I understand certain pine trees are some of the best choices for such a border.
3. Gates that lock in the evening from the La Cienega trailway leading to the back of the houses may help towards keeping out undesirable people at night.

I would like to see construction drawings in order to fully understand scope and scale. Only then would I feel comfortable that further action on my part and that of my neighbors would not be required. Thank you for your consideration.

Carolyn Klemer  
5912 Stoneview Drive  
Culver City, CA 90232

B3

From: bobbigold @dslextreme.com [mailto:bobbigold@dslextreme.com] On Behalf Of Bobbi Gold  
Sent: Wednesday, January 23, 2013 10:52 AM  
To: CAROLYN KLEMER; Hayden Sohm  
Cc: rwilliams@parks.lacounty.gov; ana.petrlic@mrca.ca.gov; dlacroix@parks.lacounty.gov;  
kkatona@bos.lacounty.gov; smcadory@parks.lacounty.gov; jbok@parks.lacounty.gov;  
fmoreno@parks.lacounty.gov; kking@parks.lacounty.gov; jwicker@parks.lacounty.gov;  
rguiney@parks.lacounty.gov  
Subject: Re: Park To Playa Environmental Impact Statement

To all concerned:

From my examination of the maps and trail proposals over the past year or two, I think that there is a potential privacy issue where hikers on certain portions of the trail behind the old school property will be able to see into the back yards of adjacent homeowners. Somehow, the trail has to be routed away from line-of-sight problems or some large bushes and trees should be planted close together.

C1

Bobbi Gold  
Homeowners on Stoneview Drive in Blair Hills

BonTerra Consulting  
Pasadena | Irvine  
225 South Lake Avenue, Suite 1000  
Pasadena, CA 91101  
T: (626) 351-2000 F: (626) 351-2030  
[www.BonTerraConsulting.com](http://www.BonTerraConsulting.com)

>>> "Bobbi Gold" <[bobbigold@ucla.edu](mailto:bobbigold@ucla.edu)> 1/27/2013 4:53 PM >>>  
Hi, Mr. Sohm-

Carolyn Klemer kindly forwarded to me your comments about the alignment of the trail south of Blair Hills.

First, we'd like to know the time of the meeting January 30, since we haven't received any notice. Would you (or Ms. Alido) send me and Ms. Klemer a formal notice or flyer that we can distribute to our neighborhood.

I live on Stoneview Drive also, although on the north side of the street. I've observed a privacy issue where the trail emerges from behind the former school and descends sharply downhill. At that point, people on the trail are able to see into the back yards of several of the homes. We did indeed discuss it at previous meetings and were told that the trail would be moved to solve the privacy problem. However, we've never seen any realignment drawings to address that issue. Do any exist, and if so, would you send them to me and Ms. Klemer.

C2

Bobbi Gold  
5929 Stoneview Drive



## Josephine Alido - Re: Park to Playa Trail

---

**From:** "Bobbi Gold" <bobbigold@ucla.edu>  
**To:** "Josephine Alido" <JAlido@bonterraconsulting.com>, <hsohm@parks.lacounty...>  
**Date:** 1/28/2013 9:21 AM  
**Subject:** Re: Park to Playa Trail  
**CC:** <ana.petrlic@mrca.ca.gov>, <cklemer@msn.com>

---

Hi, Ms. Alido-

Thank you for the notice, which we in Blair Hills had not seen previously. I'll circulate it in our neighborhood.

One comment about the IS-MND: it reports that Culver City has a View Preservation ordinance, which is true, but it concludes that that would prevent trees from being planted that could shield Blair Hills residents from negative aspects of the trail segment from the Scenic Overlook to KHSRA. That is NOT true. The Ordinance specifically exempts City-owned trees from its requirements, and I can't see how it could apply to trees or shrubs on County-owned land. Besides, the residents along Stoneview Drive (all 6 houses, including one between the former school and Blair Hills park) might very well prefer trees that hide the sight and sounds of passersby on the trail, as well as the oilfield equipment. I think that it would be wise to talk to those 6 families to see what they'd prefer. (Actually, three of those homeowners are in poor health and not able to participate in these discussions now, and two of the others have young children which make it hard to attend public meetings in the evening.)

C3

I plan to attend Wednesday evening.

Bobbi Gold

----- Original Message -----

**From:** [Josephine Alido](#)  
**To:** [hsohm@parks.lacounty.gov](mailto:hsohm@parks.lacounty.gov) ; [Bobbi Gold](#)  
**Cc:** [ana.petrlic@mrca.ca.gov](mailto:ana.petrlic@mrca.ca.gov) ; [cklemer@msn.com](mailto:cklemer@msn.com)  
**Sent:** Monday, January 28, 2013 8:47 AM  
**Subject:** Re: Park to Playa Trail

Good morning,  
 If you have not received a copy of the Notice of Intent, here it is.

Josephine Alido, AICP  
 Project Manager

**Josephine Alido - Park to Playa Trail**

---

**From:** "Bobbi Gold" <bobbigold@ucla.edu>  
**To:** <jalido@bonterraconsulting.com>  
**Date:** 2/1/2013 11:18 PM  
**Subject:** Park to Playa Trail  
**CC:** "Sohm, Hayden" <hsohm@parks.lacounty.gov>

---

Hello, Ms. Alido-

Here are my additional comments regarding segment C of the trail south of Blair Hills:

We in Blair Hills request gates at each end of the trail segment that can and will be locked from dusk to dawn.

It would be very easy for people to be on the trail segment illegally after dark by walking the short distance from Blair Hills streets up the La Cienega offramp to the bridge. And if they're there illegally, they're probably doing something else illegal.

C4

Bobbi Gold



ANTONIO R. VILLARAIGOSA  
*Mayor*

Commission  
THOMAS S. SAYLES, *President*  
ERIC HOLOMAN, *Vice President*  
RICHARD F. MOSS  
CHRISTINA E. NOONAN  
JONATHAN PARFREY  
BARBARA E. MOSCHOS, *Secretary*

RONALD O. NICHOLS  
*General Manager*

January 30, 2013

Ms. Josephine Alido  
BonTerra Consulting  
225 South Lake Avenue, Suite 1000  
Pasadena, CA 91101

**Subject: Parks to Playa Trail Project**

Dear Ms. Alido:

Thank you for the opportunity to review the Notice of Intent to Adopt a Mitigated Negative Declaration and Initial Study for the Baldwin Hills Regional Conservation Authority's Park to Playa Trail Project. This project, consisting of the creation of a comprehensive system of developed trails to connect recreational areas in the Baldwin Hills to the beach, would cross underneath the Los Angeles Department of Water and Power's (LADWP) Fairfax-Airway and Fairfax-Gramercy Transmission Lines. Therefore, please address the following items:

- 1) The applicant shall acknowledge the LADWP transmission line rights of way are integral components of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the Federal North American Electric Reliability Corporation (NERC). Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion and emergency operations. Therefore, the proposed use may from time to time be subject to temporary disruption caused by such operations.
- 2) Provide plans illustrating the LADWP's transmission line right of way boundaries within BHRCA's Project. Include towers and clearances from proposed improvements. Also, provide grading plans, storm drain plans, and street plans, including any other plans illustrating the impacts to the LADWP's transmission line right-of-way.
- 3) Conductor Clearances will be subject to the review and approval of the Transmission Engineering Group. The LADWP may need a copy of the conductor survey illustrating the cross sections showing our existing conductors and proposed improvements. See attached LADWP Conductor Survey Instructions. The Transmission Engineering Group will use the data to calculate and confirm conductor clearances meet the State of California, Public Utilities Commission, General Order No. 95 clearances.

D1

## Water and Power Conservation ... a way of life

111 North Hope Street, Los Angeles, California 90012-2607 Mailing address: Box 51111, Los Angeles 90051-5700  
Telephone: (213) 367-4211 Cable address: DEWAPOLA



- 4) All construction activities shall adhere to the LADWP's Standard Conditions for Construction. See attached.
- 5) Provide the location and elevations (heights) of all above and below ground structures, including the cross sections of existing and proposed improvements within and adjacent to the LADWP's transmission line right of way. All ground elevations are to remain unchanged from existing conditions after proposed improvements associated with BHRCA's Project are completed. Cut & fill slopes inside the LADWP's transmission line right of way steeper than 2 horizontal to 1 vertical require retaining structures or geotechnical report approval.

Note: Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than thirty feet or as noted in the State of California, PUC, General Order 95 within the LADWP's transmission line right of way is unacceptable. Ground cover for all below ground utilities shall not be less than four feet.

- 6) When grading activity affects the transmission line access roads, BHRCA shall replace the affected access roads using the LADWP's Access Road Design Criteria. See attached.
- 7) Cathodic protection system, if any, shall have a design that does not cause corrosion to the LADWP facilities. A detailed design of the cathodic protection system shall be submitted for approval to the LADWP.
- 8) All aboveground metal structures including, but not limited to, pipes, drainage devices, fences, and bridge structures located within or adjoining the right of way shall be properly grounded, and shall be insulated from any fencing or other conductive materials located outside of the right of way. For safety of personnel and equipment, all equipment and structures shall be grounded in accordance with State of California Code of Regulations, Title 8, Section 2941, and National Electric Code, Article 250.
- 9) The right of way contains high-voltage electrical conductors; therefore, BHRCA shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders; and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
- 10) No grading shall be conducted within the LADWP's transmission line right-of-way without prior written approval of the LADWP.
- 11) No structures shall be constructed within the LADWP's transmission line right of way without prior written approval of the LADWP.

D1



- 12) The LADWP prohibits drainage structures or the discharging of drainage onto the transmission line rights of way. Concentrated runoff can cause erosion especially to the transmission line tower footings.
- 13) BHRCA shall compact all fill slopes within the LADWP's transmission line right of way. The compaction shall comply with applicable Building Code requirements.
- 14) An area at least 50 feet around the base of each tower must remain open and unobstructed for necessary maintenance, including periodic washing of insulators by high pressure water spray.
- 15) No grading is allowed below the top of tower footing within the LADWP's transmission line right of way, in the immediate vicinity of the towers.
- 16) Additional conditions may be required following review of detailed site plans, grading/drainage plans, etc.
- 17) This reply shall in no way be construed as an approval of any project.

D1

If you have any questions or need further information, please contact Mr. David Nevaraz of Power System Engineering, Right-of-Way at (213) 367-3621 or Ms. Julie Van Wagner of my staff at (213) 367-5295.

Sincerely,



 Charles C. Holloway  
Manager of Environmental Planning and Assessment

JVW:lr  
Enclosures  
c: Ms. Julie Van Wagner



Chevron Pipe Line Co.  
16301 Trojan Way  
La Mirada, CA 90638  
Tel 714-228-1506  
Fax 714-228-1524  
AISuper@chevron.com

**AI Super**  
Conflict Inquiry  
Specialist

1-29-13

To: Ana Petlic:

Chevron Pipeline Company has determined that it *has* facilities inside the scope of your proposed **Park to Playa Trail Project**. Along with this letter you will find information showing the location of Chevron facilities. **This information is considered confidential and must not be distributed for any other purposes outside of this project.** If depth or elevation of our facilities is required for your project we strongly recommend potholing. Use the Underground Service Alert process and a Chevron Field Inspector will respond and observe the potholing of CPL Facilities. Please review and adhere to our specification for working near our facilities. If you require other information about our facilities do not hesitate to call me.

If a conflict cannot be avoided and your project or your client's project is subject to the CEQA/NEPA (California Environmental Quality Act/ National Environmental Policy Act), then our work is an integral component of yours or your client's project (Action). As such, we will look to you or your client to acquire any and all resource agency permitting, necessary for our integral component of the Action. Additionally, we will look to you or your client to administer all applicable conditions and/or measures stemming from the Action's EIS (Environmental Impact Statement) or equivalent and/or associated permits.

Sincerely,

A handwritten signature in blue ink that reads "AI Super".

AI Super (Contractor)  
Chevron Pipe Line Company

E1



# bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission 320 west 4<sup>th</sup> street, ste 200; los angeles, california 90013  
213/576-6615 phone 213/576-6646 fax www.smbrc.ca.gov

11 February 2013

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

**RE: Comments on the Park to Playa Trail Notice of Intent (NOI) by the Baldwin Hills Regional Conservation Authority (BHRCA)**

Dear Ms. Alido and BHRCA,

Thank you for the opportunity to comment on this Notice of Intent (NOI) to adopt a mitigated negative declaration on the Park to Playa Trail system. The Santa Monica Bay Restoration Commission is pleased to express our support for the proposed project and to provide the enclosed comments regarding the proposed comprehensive system of developed trails that would connect recreational areas and facilities from the Baldwin Hills to the beach.

The Santa Monica Bay Restoration Commission (SMBRC) is a non-regulatory state entity established by California state law to act as a steward of the Santa Monica Bay, its watershed, and its resources. Our mission is to restore and enhance the Santa Monica Bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the Bay's benefits and values. We support projects that include both natural resource enhancements through the use of native Southern California flora as well as educational components, public access, and interpretive signage. Please see the attached detailed comments below.

F1

Again, thank you for the opportunity and your consideration of our input. Please feel free to contact me at (310) 216-9827 or [sluce@santamonica.org](mailto:sluce@santamonica.org) should you have any questions or need additional information.

Sincerely,

Shelley Luce, D. Env.  
Executive Director  
Santa Monica Bay Restoration Commission

Cc: Karina Johnston, Director of Watershed Programs, SMBRC;  
Ana Petrlc, Deputy Chief of Urban Projects, MRCA

*our mission: to restore and enhance the santa monica bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the bay's benefits and values*





# bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission 320 west 4<sup>th</sup> street, ste 200; los angeles, california 90013  
213/576-6615 phone 213/576-6646 fax www.smbrc.ca.gov

## Park to Playa Trail Comments

### General

SMBRC supports the idea of the Park to Playa Trail connectivity between the Baldwin Hills and the beach. An extensive trail system aligns with the public access and educational components of our mission and our Bay Restoration Plan (BRP), which is our guiding document for project support. We only have comments and suggestions relating to some of the environmental issues assessed as having the “potential for significant adverse environmental impacts” and several that fall under the category of ‘biological resources’. We are also aware that most of these impacts will be short-term as they are related specifically to construction.

F2

### Biological Resources

- *Oak trees*: Oak tree replacement should equal or exceed the habitat value provided by the native oak trees that will need to be removed during the project, including nesting bird habitat, shade structure, and habitat complexity. To the extent possible, native vegetation should be left intact, or replaced at a higher ratio (or higher quality) to mitigate for the proposed impacts.
- *California buckwheat*: See above.
- *Biological monitors*: When appropriate or when vegetation is disturbed, we recommend that one or more biological monitors be present during those construction phases to halt equipment if mammals, herpetofauna, or birds are disturbed.
- *Irrigation*: Native plants to the southern California region should be used whenever possible to reduce the need for drip irrigation, though we recognize that some initial irrigation may be necessary to establish growth for the first few growing seasons.
- *Invasive species*: No species found on the Cal-IPC invasive species list should be planted or introduced to the project areas, and all invasives should be removed during enhancement and maintained throughout a post-construction monitoring period of no less than 5 years. Additionally, ornamental species and any species not native to Los Angeles County should be avoided throughout the enhancement project.

F3







# Department of Toxic Substances Control

*Matthew Rodriguez*  
Secretary for  
Environmental Protection

**Deborah O. Raphael, Director**  
5796 Corporate Avenue  
Cypress, California 90630

*Edmund G. Brown Jr.*  
Governor

February 12, 2013

RECEIVED  
FEB 15 2013

BY:.....

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

## NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE PARK TO PLAYA TRAIL PROJECT, (SCH#), LOS ANGELES COUNTY, CALIFORNIA

Dear Ms. Alido:

The Department of Toxic Substances Control (DTSC) has received your submitted Initial Study (IS) and a draft Mitigated Negative Declaration (MND) for the above-mentioned project. The following project description is stated in your document:

“The Proposed Project would designate some of the existing trails and would develop new trails that would be known as the Park to Playa Trail. The proposed trail improvements would be made along the designated Park to Playa Trail to provide a trail that meets the minimum design standards for recreational trails. The Proposed Project designates the alignment of the Park to Playa Trail that would lead from the parks in the Baldwin Hills area to the Pacific Coast through the Ballona Creek Bike Path and Marvin Braude Bike Path. The current project is the eastern portion of the Park to Playa Trail, which would be located in the Baldwin Hills area at the western section of Los Angeles County in the Cities of Los Angeles and Culver City and unincorporated County land. Land uses surrounding the proposed trail alignment include public park areas, open spaces; and residential, commercial, and industrial areas. The applicable zoning for the trail alignment includes Heavy Agriculture, Single Family Residence, Limited Multiple Residence, Commercial Planned Development, and Residential Planned Development”

Based on the review of the submitted document DTSC has the following comments:

- 1) The MND should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
  - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

G1

- EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
  - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The MND should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.
- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the MND.
- 4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken
- G1
- G2
- G3
- G4

during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

G4

5) Project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

G5

6) If the project area was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

G6

7) Human health and the environment of sensitive receptors should be protected during the field activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

G7

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

G8

9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

G9

Ms. Josephine Alido

February 12, 2013

Page 4

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at [rahmed@dtsc.ca.gov](mailto:rahmed@dtsc.ca.gov), or by phone at (714) 484-5491.

Sincerely,



Rafiq Ahmed

Project Manager

Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
Attn: Nancy Ritter  
[nritter@dtsc.ca.gov](mailto:nritter@dtsc.ca.gov)

CEQA # 3708





February 15, 2013

Ms. Josephine Alido  
BonTerra Consulting  
225 South Lake Avenue  
Suite 1000  
Pasadena, CA 91101

VIA ELECTRONIC MAIL and FEDERAL EXPRESS

**RE: Park to Playa Trail Initial Study/Mitigated Negative Declaration of January, 2013**

Dear Ms. Alido:

PXP reviewed the January 2013 Initial Study/Mitigated Negative Declaration (IS/MND). We have concluded that there is a fair argument that there will be significant environmental impacts, and an EIR should be prepared. Perhaps the most important defect is that the IS/MND repeatedly and incorrectly states that the Proposed Project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. This is not the case, and therefore, PXP requests that the Initial Study be revised so that it accurately describes the scope of the project and adequately discloses, analyzes, and classifies associated environmental impacts.

H1

The majority of the Inglewood Oil Field (IOF) is located in the Baldwin Hills unincorporated area of Los Angeles County, and a small portion of the field is within the jurisdiction of the City of Culver City – including the portion of the Proposed Park to Playa Trail Project referred to as “Segment C – the Blair Hills Corridor” (Segment C) in the IS/MND. The IOF has played an integral role in the history of oil production in the Los Angeles Basin and continues to be a steady source of domestic oil and natural gas. The IOF is the second most productive oil field in the entire Los Angeles Basin.

With technological advancements in the oil and gas industry, PXP’s professional engineers estimate that as much as 50% of the field’s oil resources remain in place in producing zones and can be readily accessed through drilling and production activities. These resources will continue to ensure the IOF supplies Southern California’s refineries with oil for decades to come, offsetting the need to import supplies from Venezuela and the Middle East.

H2

The IS/MND indicates that Segment C is operated by the BHRCA. This is not the case. PXP is the operator of the IOF in accordance with vested rights to surface and sub-surface oil and gas exploration, production, processing and associated activities granted to PXP in accordance with 2001 property transfer agreements between Lloyd Properties and the BHRCA.

The IS/MND also inaccurately describes Segment C of the Proposed Project as “open space,” and an “undeveloped area with past drilling operations.” This portion of the IOF is an active oilfield and has active oil and water injection wells along with facilities, such as a stormwater

H3

**Plains Exploration & Production Company**

5640 South Fairfax Avenue ■ Los Angeles, CA 90056 ■ 323.298.2200 ■ Fax: 323.293.2941

basin and pipelines. PXP has voluntarily ceased drilling and re-drilling operations while the City of Culver City processes a new oil and gas ordinance, which would regulate such activities within the portion of the IOF in Culver City. Upon adoption of this ordinance, PXP will resume all oil and gas exploration, production, processing and associated activities in this area.

H3

As mentioned above, the IS/MND repeatedly states that the proposed project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. This is not true for two reasons:

First, the bottom hole locations of wells that PXP has rights to drill and operate in this area must be within a certain distance from the surface hole locations of the well in order for the well to be reasonably feasible to drill. This distance is unique to each well and is based upon individual characteristics of the target reservoir, maximum well angles, avoidance of underground facilities and other considerations. Potential bottom hole locations for future oil field development in this area require the use of at least three existing pads in this area. One of these pads is within 50 feet of the proposed trail (just south of the abandoned school) on the parcel immediately south of the property referenced as Segment C and the other two pads are both less than 300 feet from the proposed trail. One of these two pads is located on the property referenced as Segment C and the other is located on the parcel immediately south of it.

H4

Existing regulations prevent the location of new production wells within 300 feet of areas of "public assembly," which the proposed trail could potentially be defined as. General safety considerations relative to the proposed proximity of the oilfield operations and a newly established publicly traveled thoroughfare must also be examined. Therefore, the proposed project would adversely impact IOF oil and gas production, processing and associated activities as well as affect the availability of underlying oil and gas resources on the subject property as well as adjacent properties.

Such an impact is significant as it would result in the stranding, or arguably taking, of a known mineral resource that would be of value to the region, the owners of the mineral rights, and the residents of the state. This impact needs to be appropriately analyzed, classified, and mitigated. Avoidance of this impact would occur by relocating the trail through the abandoned school site, which is designated and zoned for a public/park use, rather than through the existing and active oil field.

Second, the proposed trail location on the IOF at Segment C Blair Hills Corridor encroaches into a stormwater basin and an associated storm drain easement. The basin is included in PXP's National Pollutant Discharge Elimination System (NPDES) permit for the entirety of the IOF, and functionality of the basin in accordance with this permit is essential for operations of the IOF. Any proposed encroachment upon or adjacent to this basin would require adherence to the IOF's NPDES permit and would require RWQCB approval. The basin and easement are not adequately described in the IS/MND or mapped (Exhibit 2-6) and, as such, associated impacts are not adequately disclosed, analyzed, classified and mitigated. To lessen or avoid these impacts, the trail must be reconfigured.

H5

Further, the IS/MND proposes a large area within the IOF at Segment C for revegetation. Much of this re-vegetation is proposed within the aforementioned basin. The basin cannot be vegetated

H6

without compromising the functionality of the basin, and hence, operations of the IOF as a whole. Additionally, the amount of revegetation proposed in Segment C is inconsistent with the replacement ratio of 1:1 identified within MM 4.4-1 as the amount being vegetated in Segment C is far more than what is proposed for removal. MM 4.4-1 also states that "any habitat proposed for preservation in order to meet the 1:1 criterion shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA." Such a requirement would be of a breach of the oil and gas agreements between BHRCA and PXP as discussed above; therefore, this must be removed.

H6

Additional comments and supporting material are attached to this letter.

We appreciate your consideration of our comments. Please feel free to contact me should you have any questions.

Sincerely,



Laura Vlk  
Senior EH&S Specialist

Cc: Steve Rusch, Vice President EH&S and Government Affairs  
Stephen Burke, Manager Land  
John Martini, Manager EH&S and Government Affairs  
Candace Salway, Manager EH&S  
Jennifer Cox, Landman  
Rae Connet, Contract, Land  
Ana Petric, Deputy Chief of Urban Projects and Watershed Planning Division, Baldwin Hills Regional Conservation Authority  
Gail Farber, PE, Director, Los Angeles County Department of Public Works  
Charles D. Herbertson, P.E., L.S. City of Culver City, Director of Public Works  
The Honorable Mark Ridley-Thomas, Second Supervisorial District; Attn: Karly Katona

**Additional PXP Comments to the Park to Playa Trail IS/MND dated January, 2013  
February 15, 2013**

1. This document refers to the entire project area as "open space." The area referred to as "Segment C - Blair Hills Corridor Trail" is not open space. It is an active, oil field. Update text accordingly. Examples of where this occurs:
- Page 1-1, Section 1.1, second paragraph
  - Page 2-1 Section 2.1
  - Page 2-2, Section 2.2, last paragraph
  - Page 2-3, Section 2.3, third paragraph
  - Page 3-1, Section 3.1, 1st bullet
  - Page 4-61, h) 2nd paragraph
  - Exhibit 4-17
  - Page 4-78, 1st paragraph
  - Page 4-90, Nearby Residences
  - Page 4-97, Recreational Plans

H7

2. Correct the description of the oilfield use from "oil and gas production" to "oil and gas exploration, production, processing and associated activities." Examples of where this change is to occur:
- Page 2-3, Section 2.3, 2nd paragraph
  - Page 2-3, Section 2.3.1, 3rd paragraph
  - Page 2-5, Section 2.3.2, 2nd paragraph
  - Page 4-4, Section 4.1.1 Page 4-82, Section 4.12.1 - Oil Resources

H8

3. The document lacks any formal, cumulative impact analysis. Include. H9

4. The IS/MND incorrectly describes the presence of groundwater in the LA Basin, and in particular, the Baldwin Hills. The geology of the Baldwin Hills constrains the occurrence and movement of groundwater, as described in the USGS groundwater model of the LA Basin (USGS 2003), the California Department of Water Resources groundwater assessment of the LA Basin (DWR 1961), and studies specific to the IOF.

The USGS excludes the Baldwin Hills from the model domain, separating it by a no-flow boundary. The no-flow boundary condition means that groundwater neither flows in to or out of the Baldwin Hills; it is isolated from the remainder of the LA groundwater basin. In the definitive account of the groundwater geology of the LA Basin, the Department of Water Resources concludes that "the Baldwin Hills form a complete barrier to groundwater movement, where the essentially non-water bearing Pico Formation crops out (DWR 1961)."

H10

The results of the extensive, peer reviewed, site specific study of the Baldwin Hills, including a groundwater monitoring array that traverses the entire zone of potential fresh water, are in complete agreement with the finding of the USGS and DWR. All of the oil producing zones of the IOF (below 500 feet) contain water too saline for direct use at the surface, as is the case in all parts of the world - water at greater depths is saline, not drinkable, and sometimes referred to as formation water. The USEPA makes this distinction in the Safe Drinking Water Act. Only the upper 500 feet, above the top of the Pico Formation, has any fresh water, albeit limited in extent and yield.



In most of the LA Basin, the base of the fresh water zone is defined by the Pico Formation. Overlying the Pico Formation are the aquifer systems in the LA Basin located away from the Baldwin Hills: the Inglewood Formation, the Silverado Formation, and the Lakewood Formation. In many parts of the LA Basin, these formations are aquifers for water supply wells. These formations became folded and faulted in the geological uplift of the Baldwin Hills, and are in fact exposed at the surface. Their disruption by the uplift of the Baldwin Hills has disconnected them from the groundwater-bearing formations of the LA Basin (USGS 2003, DWR 1961).

H10

Update accordingly; examples of where text requires updating are on pages 4-56, 4-68, and 4-70(b).

5. The document states that no long-term adverse changes/impacts in stormwater runoff quality would occur with the proposed project. However, stormwater runoff from the operational phase of the Proposed Project that enters the stormwater basin on the IOF could adversely affect the water quality of the basin due to trail use by humans and pets. Such changes constitute an environmental impact, and require appropriate analysis and mitigation in the environmental document for this project. Examples of where this update needs to occur follow:

H11

- 4-63 (RR 4.0)
- 4-68 (a,f)
- 4-69 (2nd paragraph)
- 4-71 (1st/2nd paragraphs)
- 4-71 (g,h)
- 4-72 (j)
- 4-73 (RR 4.9-1)

6. The document does not disclose the Lead Agency's thresholds of significance for environmental impact classification. These thresholds need to be clearly disclosed and the environmental impact analysis in the document must compare and measure project impacts to these thresholds to provide adequate environmental impact analysis in accordance with CEQA.

H12

7. The operator of the Blair Hills Corridor property is Plains Exploration and Production Company (PXP) - not BHRCA. The 2001 deed from Lloyd Properties to BHRCA states the property is subject to the existing oil and gas agreements among other items identified in that Deed (Document No. 2001-2415029). Further the aforementioned Deed contains a drill site and associated easement reservation for future drilling operation.

H13

Additionally, the proposed trail passes through a slope, future street, Public Utility, access, and pipeline easements. Descriptions of these easements and any associated impacts resulting from encroachment into these easements needs disclosure, environmental analysis, impact classification and mitigation.

Further, the IS/MND repeatedly refers to the property that Segment C of the proposed trail goes through as an "undeveloped area with past drilling operations." This is not the case. PXP has voluntarily ceased the drilling or redrilling of wells in this portion of the IOF as a courtesy to the City of Culver City while they draft a new oil and gas ordinance to govern such operations in this

H14

location. This portion of the oilfield still has active oil and water injection wells along with facilities, such as a stormwater basin and pipelines, and upon Culver City's adoption of the aforementioned oil and gas ordinance, PXP will resume all activities associated with oil and gas production/processing on this property. Examples of where text to be changed to reflect this follow:

- Page 2-4, Table 2-1
- Page 2-5, Section 2.3.3
- Page 4-4, Segment C
- Page 4-56, 4th paragraph of "Oil Drilling Operations"
- Page 4-77, a, b
- Page 4-82 (a)

H14

8. The proposed trail location at Segment C Blair Hills Corridor crosses a RWQCB permitted/required stormwater basin and stormdrain easement. The flood control basin and easement are not adequately described in the IS/MND or mapped (Exhibit 2-6) and associated impacts are not adequately disclosed, analyzed, classified and mitigated.

The basin is approximately 1.3 acres. Stormwater from portions of the oilfield on both the northeast and northwest sides of La Cienega as well as stormwater and overflow water from the lake at KHSRA drains into the basin. A map depicting the boundary of this stormwater basin is included as Exhibit 1 to this Attachment. The basin is included in PXP's NPDES permit for the Inglewood Oil Field, and functionality of the basin in accordance with this permit is essential for operations of the field and the proposed trail encroaches upon the path of the natural drainage.

The trail as currently proposed encroaches into the basin, and hence, the trail as proposed would be subjected to periodic flooding in this area during rainy seasons. Such flooding poses safety and water quality impacts. To lessen or avoid these impacts, the trail must be reconfigured.

Examples of where descriptions, analysis, and impacts need updating are Exhibit 2-6, Page 2-5, Page 4-30(b), Table 4-8, Page 4-30, Page 4-37 (b and MM 4.4-6), Page 4-56 and Page 4-61 (h).

H15

9. Page 2-3: f, g) Impacts from waste generated from potential petroleum impacted soil were not evaluated. This needs to be included, classified and mitigated.

H16

10. Exhibit 4-3: "Existing Views of Segment C" No views identified as IOF. H17

11. Page 4-27: The biological section of the IS/MND as well as associated exhibits label "Features A and B" as "jurisdictional." As stated in the text of the IS/MND neither of these "features" are "jurisdictional;" hence, they cannot be labeled as such. Please update accordingly.

H18

12. Page 4-83: As stated in the cover letter to these comments, the IS/MND repeatedly states (as it does here) that the proposed project would not impact nearby oil and gas production activities, nor would it affect access to and the availability of underlying oil and gas resources. This is not true.

H19

The bottom hole locations of wells that PXP has rights to drill and operate in this area must be within a certain distance from the surface hole locations of the well in order for the well to be reasonably feasible to drill. This distance is unique to each well and is based upon individual characteristics of the target reservoir, maximum well angles, avoidance of underground facilities and other considerations. Potential bottom hole locations for future oil field development in this area require the use of at least three existing pads in this area. One of these pads is within 50 feet of the proposed trail (just south of the abandoned school) on the parcel immediately south of the property referenced as Segment C and the other two pads are both less than 300 feet from the proposed trail. One of these two pads is located on the property referenced as Segment C and the other is located on the parcel immediately south of it.

H19

Existing regulations prevent the location of new production wells within 300 feet of areas of "public assembly," which the proposed trail could potentially be defined as. General safety considerations relative to the proposed proximity of the oilfield operations and a newly established publicly traveled thoroughfare must also be examined. Therefore, the proposed project would adversely impact IOF oil and gas production, processing and associated activities as well as affect the availability of underlying oil and gas resources on the subject property as well as adjacent properties.

Such an impact is significant as it would result in the stranding, or arguably taking, of a known mineral resource that would be of value to the region, the owners of the mineral rights, and the residents of the state. This impact needs to be appropriately analyzed, classified, and mitigated. Avoidance of this impact would occur by relocating the trail through the abandoned school site, which is designated and zoned for a public/park use, rather than through the existing and active oil field.

13. The proposed trail location at Segment C Blair Hills Corridor crosses a RWQCB permitted/required stormwater basin and stormdrain easement. The flood control basin and easement are not adequately described in the IS/MND or mapped (Exhibit 2-6) and associated impacts are not adequately disclosed, analyzed, classified and mitigated.

The basin is approximately 1.3 acres. Stormwater from portions of the oilfield on both the northeast and northwest sides of La Cienega as well as stormwater and overflow water from the lake at KHSRA drains into the basin. A map depicting the boundary of this stormwater basin is included as Exhibit 1 to this Attachment. The basin is included in PXP's NPDES permit for the Inglewood Oil Field, and functionality of the basin in accordance with this permit is essential for operations of the field and the proposed trail encroaches upon the path of the natural drainage.

H20

The trail as currently proposed encroaches into the basin, and hence, the trail as proposed would be subjected to periodic flooding in this area during rainy seasons. Such flooding poses safety and water quality impacts. To lessen or avoid these impacts, the trail must be reconfigured.

14. Exhibit 3-3 shows the area within Segment C that is proposed for revegetation. The amount of revegetation proposed in this area is inconsistent with the replacement ration of 1:1 identified within MM 4.4-1. Further, much of the re-vegetation is proposed within the existing retention basin on site. The retention basin cannot be vegetated without compromising the functionality of the basin, and hence, operations of the IOF as a whole. MM 4.4-1 also states that "any

H21

- habitat proposed for preservation in order to meet the 1:1 criterion shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA." Such a requirement would be of a breach of the oil and gas agreements between BHRCA and PXP as discussed above; therefore, this must be removed. H21
15. Exhibit 3-3 shows the area within Segment C that is proposed for revegetation. The amount of revegetation proposed in this area is inconsistent with the replacement ration of 1:1 identified within MM 4.4-1. Further, much of the re-vegetation is proposed within the existing retention basin on site. The retention basin cannot be vegetated without compromising the functionality of the basin, and hence, operations of the IOF as a whole. MM 4.4-1 also states that "any habitat proposed for preservation in order to meet the 1:1 criterion shall be dedicated as permanent open space and preserved in perpetuity by the BHRCA." Such a requirement would be of a breach of the oil and gas agreements between BHRCA and PXP as discussed above; therefore, this must be removed. H22
16. Table 3-2 indicates that a shade structure will be developed on Segment C; however, Exhibit 3-3 does not show where this shade structure would be located. Also the existing water line that will be re-located needs to be shown in its current and proposed locations as does the drip irrigation system. The access road also needs to be shown where its proposed re-location will be and a description of its width, etc. and impact analysis of moving it needs to be included. The description of Segment C: Blair Hills Corridor Trail on Page 3-3 states that retaining walls would be provided along the western edge of the proposed trail. Plat identifies "Additional Fencing." However, no details are provided herein regarding material, height, etc. Fence will need to be adequate to protect and secure the IOF current and future operations from trail construction and maintenance activities and trail users. Further, the CA Department of Conservation Division of Oil, Gas and Geothermal Resources requires a fence of a minimum of six feet, but not to exceed eight feet in height with at least three strands of barbed wire mounted on top of the fence at this location. The associated impact on stormwater drainage, erosion and any other applicable environmental issue areas need to be evaluated, classified and mitigated. H23
17. Page 3-3 Segment C: Blair Hills Corridor Trail. The third paragraph should be revised to read the "existing oil and gas operations road serving the active IOF would need to be relocated..." The proposed relocation of active oil and gas facilities will require a use agreement with PXP as BHRCA's surface property is subject to PXP's rights granted in various oil and gas agreements. As noted above, the 2001 Deed to BHRCA identifies these agreements and notes the surface property is subject to these agreements; PXP is the current Lessee and Operator of these Agreements. Additionally, the proposed alignment would require some type of agreement with Lloyd Properties as the proposed trail passes through the reserved drill site and easement described in detail in the 2001 Deed to BHRCA. H24
18. Page 4-17: Regional Operational Emissions: This states that the proposed project would have no new trip generation and that no measurable increase in vehicle trips that would be attributed only to the use of the trail and maintenance would be provided by existing KHSRA site personnel. However, other sections of the document disclose that there will be future increases in the number of trail users (Pages 4-62, 4-88, 4-90, 4-97). As stated in comments below on the traffic section, a traffic study must be done to adequately disclose, analyze, classify and mitigate associated air quality impacts from additional vehicle trips. H25



19. Exhibits 4-10A and 4-10B: PXP contests the accuracy of the biological analysis completed for the preparation of Figures of 4-10A and 4-10B. Accordingly, PXP's biologists are conducting biological surveys and inconsistencies will be provided upon completion of the surveys.

H26

20. Page 4-48: Where did the data showing that as much as ten feet of subsidence occurred at the five points intersection and the center of the IOF come from? What data substantiates the claim that "additional subsidence may have occurred in the northwestern section of the oilfield where oil drilling is currently most intensive?"

These statements are not consistent with the CSD EIR analysis, which states that prior to 1971, the maximum cumulative subsidence of any of the areas along the Newport-Inglewood fault zone was centered over the IOF, where 67,000 acre-feet of oil, water and sand had been withdrawn from shallow production horizons. Water injection into the shallow production horizons began in 1957 and as of 1971, effectively eliminated subsidence associated with oil and gas production.

The CSD EIR is a very thorough and site specific environmental analysis of the IOF, and does not include the subsidence claim at the five points intersection. As such, if this claim cannot be substantiated, it must be removed from this document.

The CSD requires an annual ground movement survey at the IOF, which measures accumulated subsidence or uplift. According to the 2011/2012 surveys, there is no correlation between measured elevation changes and field activities.

Oil drilling is not "currently most intensive" in the northwestern section of the oilfield. New wells that have been drilled or that are scheduled to be drilled are dispersed throughout the field, with no one area of the field receiving a majority of new wells. Remove this claim from the document.

H27

21. Page 4-55: The 4th paragraph states that "the alignment of the proposed trail in this segment has been located along the edges of the property farthest from oil drilling operations." This is not true. The trail encroaches well into the Dabney Lloyd lease area, and hence, would create new safety hazards as described in comments below more than it would if the trail were located along the property line and through the abandoned school site. This impact must be adequately and correctly evaluated, and the trail must be moved so it truly is as far from PXP's current and future operations as possible.

H28

22. Page 4-57: The analysis of the hazardous materials used and those that potentially would be used at the IOF in Segment C, and the potential risk to the uses of the trail, need to be analyzed. The Baldwin Hills CSD EIR is a good reference.

H29

23. Page 4-59: The 4th paragraph ties the presence of arsenic in soil to oil operations. Arsenic occurs naturally in soil and rock formations throughout the Los Angeles Basin and its occurrence in soil underlying the proposed project is not related to oil development. As documented by the USEPA, when "compared to the rest of the United States, western states have more systems with arsenic levels greater than the [US]EPA's standard of 10 parts per billion (ppb)." Arsenic delineation maps produced by the USGS in 2011 have documented increased levels of arsenic in both Los Angeles County and Southern California as a whole. These data are also consistent

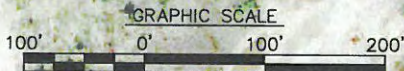
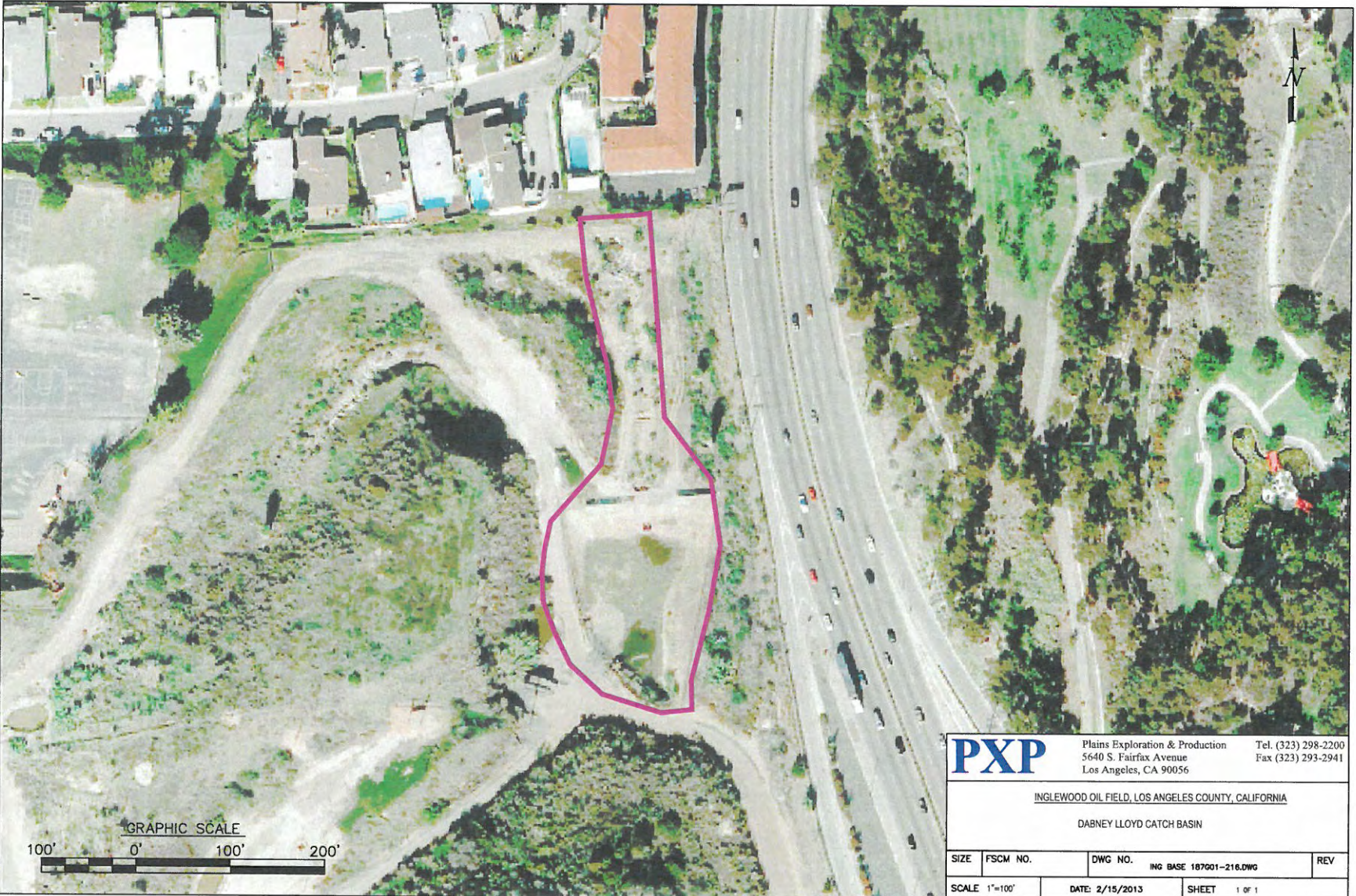
H30

- with soils data from the 2008 California Department of Toxic Substance Control (DTSC) memo "Determination of a Southern California Regional Background Arsenic Concentration in Soil." Therefore, the effect of arsenic in soil upon workers/the public needs to be analyzed for all trail segments and the association to oil operations must be removed from this analysis. H30
24. Page 4-59: The 4th paragraph states that "the alignment of the proposed trail in this segment has been located along the edges of the property farthest from oil drilling operations." This is not true. The trail encroaches well into the Dabney Lloyd lease area, and hence, would create new safety hazards as described in comments below more than it would if the trail were located along the property line and through the abandoned school site. This impact must be adequately and correctly evaluated, and the trail must be moved so it truly is as far from PXP's current and future operations as possible. H31
25. Page 4-59: The 5th paragraph states that no endangerment assessment has been completed for Segment C. Why not? Such an assessment needs to be included to ensure the safety of workers and compliance with CEQA. H32
26. Page 4-64: MM 4.8-1: It is inappropriate and out of the scope of this IS/MND to mitigate future uses of the site (the last two bullet points) - especially since this project only covers a portion of a much larger expanse of land with existing oil and gas operations and existing and future development rights for oil exploration, production, processing and associated activities. H33
- Additionally, this mitigation measure must be edited to reflect that if any contaminated soils are encountered on the oilfield during construction, PXP must be contacted to assist in the determination of responsibility and handling of the contaminated soil.
27. Page 4-67: The entire second paragraph of the Drainage Patterns section is incorrect and must be deleted. The third paragraph of this section should be corrected to indicate that the portion of the Inglewood Oil Field within the project area drains northeast – there are different drainage patterns in other parts of the field. H34
28. Page 4-72: j) The Gwen Moore fishing lake also poses seiche hazards to the Dabney Lloyd retention basin in Segment C of the trail as overflow waters from this lake discharge into this basin. This impact needs to be re-evaluated and mitigated based upon this information. Further, this analysis states that trail users are not expected to use and could "stay away" from Segment C during periods of heavy rain when this portion of the trail could be exposed to flooding and mudflow hazards. How would trail users be prevented from doing this? What if trail users did not adhere to this expectation? This impact needs appropriate analysis and mitigation. H35
29. Page 4-75: The Land Use Section needs to analyze and classify and mitigate any impacts that could occur to potential land locking of parcels due to trail construction. H36
30. Page 4-75: The land use section of this document does not analyze consistency with applicable DOGGR regulations. Update accordingly H37
31. Page 4-75: The land use section did not compare trail specifications to the Dept. of Public Works applicable regulations, standards and guidance documents. Update accordingly. H38

32. Page 4-79: Table 4-12. This table states that the Social Resources goal of providing appropriate economic opportunities is not applicable. This is not correct as PXP has rights granted in various oil and gas agreements on the property where Segment C of the proposed trail would be. As such, the potential impacts to impeding economic development of these resources must be analyzed and mitigated. H39
33. Page 4-82: 1st paragraph: The IOF covers approximately 1,000 acres, not 950 acres as written. Update accordingly. H40
34. Page 4-82: Oil Resources, 2nd paragraph: This text states that no trail improvements are proposed on or near active oil wells. This is not true. There are active wells within 500 feet of the proposed trail. H41
35. Page 4-82: a) states that the dirt roads in this area would remain in place to allow future oil drilling activities; however, the proposed project includes a proposal to move an existing dirt road to accommodate the trail. H42
36. Page 4-85: Table 4-13 indicates that ambient noise levels were measured by calculating averages from only 20 minutes of noise measurements at each noise measurement site. An adequate noise baseline is achieved with a minimum of three days of non-stop noise measurements on week days (when the most noise is typically generated; hence, allowing for a CEQA mandated, worst case scenario). The noise baseline must be re-established using standard noise measurement/baseline determination methodology. H43
37. Page 4-88: c) This analysis states that new noise resulting from the project would be similar to maintenance noises currently occurring and would not result in a substantial increase in ambient levels. This is untrue as portions of the trail, in particular Segment C, currently do not have any park users using the property and any new noise from this new use would increase ambient noise levels. In consideration of this, this impact needs to be appropriately analyzed, classified and mitigated. H44
38. Page 4-90: Trail Users: This section states that no comprehensive count of trail or park users has been made. Without this count, how can environmental impacts be adequately evaluated, classified and mitigated? Such a study must occur if this environmental analysis/document is to be adequate per CEQA. H45
39. Page 4-91: b, c) This text includes an analysis of business/employee displacement, which is not applicable to the checklist questions regarding displacement of housing and people within such housing. Remove. H46
40. Page 4-93: 4.15.2 a) (i) states that the project would not increase the demand for fire protection services; however, as stated above, the proposed project would increase the risk of fire in Segment C. Increased fire risk at an oilfield is a significant, environmental impact. As such, this section needs to include this risk analysis, and how it would affect emergency response service levels to appropriately analyze, classify and mitigate this impact. Note that simply including "no smoking signs" or the like are not adequate mitigation for such a risk, especially since there is no H47

- proposed method of enforcement nor is there direct vehicle access for police patrolling on trail Segment C. H47
41. Page 4-99: A parking analysis was not conducted. Will the existing parking lots be able to accommodate all of the existing and new park/trail users? This potential impact needs to be analyzed, classified and mitigated. H48
42. Page 4-103: b) A traffic study was not done for the proposed project, and as such, the analysis, classification of impacts and mitigation in the transportation/traffic section of this document is not adequate. This section simply states that the project would not generate 50 or more trips on mainline freeways, and therefore, a traffic impact analysis would not be required. How was it determined that the project would cause less than 50 trips? How was it determined that most trail users would come to the trail outside of peak hours? In order to make such determinations, a traffic count must be conducted. The estimated number of new vehicle trips and new users this trail would generate needs to be disclosed and analyzed in conjunction with applicable level of service standards and CEQA thresholds of significance. H49
43. Page 4-103: b) this states that "the proposed trail alignment would not be located along or cross La Cienega Blvd. " This is not true. The proposed trail alignment runs along La Cienega Blvd. on the west side of the KHSRA overpass. Hence, this impact needs re-evaluation, appropriate classification and mitigation. H50
44. Page 4-104: d) Traffic safety impacts with relation to the pedestrian/bicyclist and vehicle interaction were not analyzed. This needs to be included in the document. The La Cienega overcrossing and the 5-points intersection are a dangerous intersections for pedestrians and bicyclists to use and cross. The La Cienega overcrossing to Segment C of the proposed project would require trail users to descend a steep decline from the bridge at KHSRA to La Cienega. How would the trail be designed to avoid trip and fall hazards from this steep decline? How would emergency vehicles access the trail should a user become injured on the trail? H51
45. Page 4-109: c) The proposed trail and proposed revegetation in Segment C encroaches upon an existing, RWQCB permitted, stormwater basin at the IOF. As such, the trail and revegetation would be subjected to periodic flooding, and would contribute to stormwater runoff that would require compliance with the IOF NPDES permit. This impact needs re-evaluation, classification and mitigation (particularly, re-alignment of the trail to avoid the retention basin). H52
46. Page 4-110: f, g) Impacts from waste generated from potential petroleum impacted soil were not evaluated. This needs to be included, classified and mitigated. H53





**PXP** Plains Exploration & Production Tel. (323) 298-2200  
 5640 S. Fairfax Avenue Fax (323) 293-2941  
 Los Angeles, CA 90056

INGLEWOOD OIL FIELD, LOS ANGELES COUNTY, CALIFORNIA  
 DABNEY LLOYD CATCH BASIN

SIZE	FSCM NO.	DWG NO.	ING BASE 187001-216.DWG	REV
SCALE 1"=100'	DATE: 2/15/2013	SHEET	1 OF 1	

# CONE FEE TRUST

Liz K. Gosnell, Trust Agent  
2245 E. Colorado #620  
Pasadena, CA 91107  
626.533.3730  
Email: [4gosnell@charter.net](mailto:4gosnell@charter.net)

Winifred T. Hoss, Esq.  
Clifford & Brown  
1430 Truxtun Avenue,  
Suite 900  
Bakersfield, CA 93301  
661. 322.6023  
email: [whoss@clifford-brownlaw.com](mailto:whoss@clifford-brownlaw.com)

## VIA ELECTRONIC MAIL & OVERNITE USPS

Ms. Josephine Alido  
Bon Terra Consulting  
225 S. Lake Avenue, Suite 1000  
Pasadena, CA 91101

[jalido@bonterraconsulting.com](mailto:jalido@bonterraconsulting.com)

**RE: Park to Play Trail Initial Study / Mitigated Negative Declaration dated January, 2013  
Comment of Cone Fee Trust**

Dear Ms Alido:

The Cone Fee Trust (CFT) is a landowner within the Inglewood Oil Field (IOF) and writes to you as part of CFT's comment on the Initial Study/Mitigated Negative Declaration (IS/MND) relative to the Park to Playa concept. For the reasons enumerated below (and joining in and incorporating many of the comments of CFT's lessee, Plains Exploration & Production Company (PXP) lodged on February 15, 2013), CFT objects to the Park to Playa Project (to the extent to which the County seeks to impose a trail-way across a portion of and along the perimeter of the IOF) and finds myriad substantive defects with the IS/MND which compel the County to revise the plan overall, revise and expand the scope and content of the IS/MND requiring the completion of an EIR and to end any further consideration of allowing for trail-ways across and immediately adjacent to the IOF.

11

1. **The Park to Playa plan, which seeks to install a trailway along the perimeter of the IOF, should be redesigned so that no trails come across and/or immediately abut oil field property and are otherwise of a sufficient distance away from any oil and gas operations and equipment so that the operations and equipment are sufficiently insulated from public access.** Although CFT disputes the false characterizations offered by various special interests concerning features of the IOF and the effects of operations thereat, it is respectfully suggested that the County not invite – through the ill-conceived trail-ways – the public to the areas across and immediately around the IOF's perimeter. Such a design needlessly increases the risk of frivolous lawsuits and unwarranted interference with the lawful uses within and upon the IOF. CFT suggests that the County re-design its trail-ways so that there are none which will cross any portion of or which will run along or immediately adjacent to the IOF perimeter.

12



In addition to common sense, the authority for this prudent course is statutory. California Public Resources Code Section 15370 specifically requires the County to consider scrapping this component of the Park to Playa plan altogether. Section 15370 defines “Mitigation” to include: “ (a) Avoiding the impact altogether by not taking a certain action or parts of an action; (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (e) Compensating for the impact by replacing or providing substitute resources or environments.” Similarly, PRC Section 21081.6(b) makes clear that avoidance of harm is one of the paramount purposes of the mitigation directive: “A public agency shall provide that measures to mitigate or avoid significant effects on the environment are **fully enforceable** through permit conditions, agreements, or other measures. Conditions of project approval may be set forth in referenced documents which address required mitigation measures or, in the case of the adoption of a plan, policy, regulation, or other public project, by incorporating the mitigation measures into the plan, policy, regulation, or project design.”

13

The IS/MND cites no good cause for the trail-ways to cross upon and/or immediately abut IOF property and in such proximity to oil and gas operations and equipment. As the County knows, the CSD, as originally enacted and subsequently addressed in a settlement between the County, PXP and special interests provides for certain green belts and buffers; however, these accommodations are not and were never intended to be an invitation to bring the public *closer* to the IOF or the oil and gas operations.

2. **From a public safety standpoint, the IS/MND also fails to address the obvious homeland security and terrorism concerns attendant to having public access across and along the perimeter of the IOF; as such, the IS/MND does not comply with and fails to meet the mitigation evaluation requirements under governing law.** Installing a public railway immediately abutting and adjacent to an active and extensive oil and gas exploration and production field implicates innumerable security issues. Yet, the IS/MND is silent on this subject (a silence even more problematic given, as discussed below, the omission of any projected user data to assess the average number of users on a daily, weekly or monthly basis). The IS/MND should, therefore, be tabled pending an initial threshold review of the security risks to the IOF posed by the proposed railways along the IOF’s perimeter and unnecessarily close to oil and gas operations and equipment.

14

3. **Without an Environmental Impact Report (EIR), the IS/MND does not comply with or fulfill CEQA requirements.** In its current form, the IS/MND omits the CEQA requirement that the environmental impacts under CEQA be adequately revealed and reviewed so that the Lead Agency and the public are provided with sufficient degree of analysis to allow them to accurately determine if the project may have a significant effect on the environment. CEQA also requires the support of a known mineral resource that is of value to the region and the residents of the state. The IOF represents a substantial mineral resource base that, through the efforts of the landowners in the IOF and the oil and gas operators, has long been a valuable contributor to the region and residents of Los Angeles County and the state. What cannot be overlooked either is the very significant revenue stream to the County

15

which these operations provide and will provide for the foreseeable future. The omission of the EIR and a rigorous analysis of the net and long term benefits of the IOF to the County and its residents underscores that the Park to Playa concept – as it relates to the areas across and immediately abutting the IOF – have not been studied.

15

Moreover, the IS/MND which fails to include a traffic density study and analysis and fails to include usage projections (omissions which mislead any unfamiliar reader to erroneously assume that traffic volume is somehow far less than the 500,000+ cars a week that do pass on La Cienega and La Brea between La Tiejra and Rodeo during peak traffic hours alone). Notably, the Baldwin Hills CSD Final EIR (Section 4.7 Transportation and Circulation) provides a detailed resource for the calculation of then existing traffic usage; yet, the IS/MND ignores this valuable resource and glosses over, with patently inadequate information and merely conclusions, one of the key public safety issues – traffic and pedestrian interaction and usage. Further, the IS/MND fails to address homeland security/terrorism and the practicalities and risks associated with bringing the public across and immediately around the IOF. Under these circumstances, the IS/MND simply cannot be said to include a forthright and fully vetted discussion of the mitigation criteria as required by law. An IS/MND does not supply all the required data supplied in an EIR so agencies are forced to demand changes later during the construction review process when they will finally receive project detail. Without the proper analysis provided in an EIR, these same agencies are asked to sign off on a project with only an IS/MND and are blind since all the required studies of CEQA were not being supplied at this time.

16

4. **The IS/MND repeatedly mis-cites the IOF in the Baldwin Hills Park Master Plan as designated “open space,” which it is not.** That characterization is and has long been erroneous – the IOF is not open space and the County, State and all municipal entities should discontinue any further use of the erroneous reference in the IS/MND and in any and all related Baldwin Hills Regional Conservation Authority (BHRCA) materials and website content.

17

5. **The IS/MND is defective in that it fails to include any actual trail use estimations and, because of the lack of the required traffic studies, user safety at several intersections - specifically 5 points - is actually ignored and errantly claimed to have less than significant impact.** This failure and related failures regarding overall projected trail-way usage plagues the entire IS/MND because, through omission and the failure to provide this key information to the County and public, the report improperly seeks to circumvent EIR and related traffic/usage study and analysis by leaving the erroneous impression that there are no traffic and usage issues to reveal and address. This problem is also underscored by, as discussed below, a reference to traffic patterns on a 10 mile stretch of La Cienega and not, as is most telling and appropriate, the actual usage and density of traffic on the 2-3 mile stretch of La Cienega from La Tiejra to Rodeo. Mr. David McNeil, Executive Director of the Baldwin Hills Conservancy even conceded that a traffic study is warranted as part of a proper due diligence of these issues (in a discussion with me at the February 7, 2013 water board meeting) and that BHRCA could and/or would pay for it. These omissions, combined with the additional, substantive omissions cited in Paragraphs 1-3 above, demonstrate what we find to be a deliberate effort to avoid the evaluations required by law- evaluations which when based on the required and proper studies and discussions of the statutory

18

criteria and that addressed above will require the Park to Playa trail-way across and immediately adjacent to the IOF to be scrapped and/or substantially re-designed. There is no doubt that the IS/MND does not represent a full and forthright identification, study and discussion of the mitigation issues required by law to be substantively and thoroughly discussed and considered before embarking upon a project of this nature.

I18

6. **The IS/MND mis-cites the operational control of the IOF and contains other notable misunderstandings regarding the oil field operation.** For example, portions of Segment C - Blair Hills Corridor of the Park to Playa Trail - is operated by PXP *not BHRCA* as stated in the document. There are active oil and water injection wells - both storm water basins and pipelines. This property is leased for drilling and re-drilling of wells in accordance with the oil and gas leases governing the surface rights and mineral rights of this property. The IS/MND ignores these facts along with Department of Oil, Gas, and Geothermal Resources (DOGGR) regulations for drilling and general safety related operations. Segment 2.3.3 of the trail on page 2-5 also includes a flood control basin that is governed by the Regional Water Quality Control Board, is not properly described in the document, may well result in flooding and thereby necessitating the relocation of the trail-way in any case. The design makes no allocation and the IS/MND contains no discussion regarding safety measures for homeland security and/or law enforcement,<sup>1</sup> fire access and control or other related measures to protect the oil and gas operations and equipment where the trail is designed to run along a 1,000 acre oil field perimeter. Instead of embracing a known mineral resource, Park to Playa disregards its value and provides no suggestions to protect it in this document.

I19

7. **There are several references to the BHRCA adopted Baldwin Hills Park Master Plan (Section 2.2 Project Background, page 2-1) which proposes a two square mile urban park; that reference is misleading and potentially exposes the County to liability for inverse condemnation.** This language is improper and misleads the public to believe that the County has effectively engaged in an inverse condemnation of oil field property, in whole or in part, and/or that the County has any rights to convert same into a park. The reference also perpetuates the false characterization that the entire IOF is designated "open space," **which it is not.** This material error is not limited to the wrongful "open space" designation. For example, Section 4.5.1 Environmental Setting (page 4-39) mistakenly asserts that the Baldwin Hills Master Plan states that the historic home of the Chandler family is located on the western ridgeline of the Kenneth Hahn State Recreational Area (KHSRA). This house is on private property and has no affiliation with KHSRA and is not located within the KHSRA.

I10

8. **The IS/MND is manifestly deficient in its failure to quantify, with any traffic and/or usage studies, the expected usage of the trails.** In addition to the points raised in Paragraph 5 above, the IS/MND is devoid of any substantive and meaningful discussion of projected usage and traffic/density studies and risks. For example, the actual and/or projected numbers of users - walkers, joggers, hikers,

I11

---

<sup>1</sup> At the 1/16/2013 general public meeting by BHRCA regarding the adoption of the Mitigated Negative Declaration, the representative from Parks stated that the trail would be overseen by the same park rangers with assistance from various police entities. He admitted that they would not be in place on the trail and did not know yet how they would actually police it.



bicyclists, leashed-dog walkers, roller bladers, and skate boarders – and provide any meaningful exhibits or breakdown (Section 2.3 project Characteristics pg 2-3) to support the under-reported figures suggested therein. For example, though the proposed trail crosses several public streets, there are no traffic studies provided and available EIR data for Portion C is not utilized. This is a major disregard for public safety. Five points - the intersection where La Brea, Overhill and Stocker meets - is already a major pedestrian issue. With the addition of an unknown number of various types of trail users, the public safety is a significant issue that needs to be but is not addressed. At the public meeting held on January 30, 2013, references were made by several officials from various agencies that the five points intersection would be addressed with walking bridges through the Los Angeles County 2035 General Plan. An approved, adopted Department of Public Works plan should have been attached to justify the consideration for omitting traffic studies, but it was not. Since the General Plan has yet to be approved and adopted, it is safe to assume that no such mitigation exists and it is incumbent upon the County to specifically address these issues now. The next portion of the trail between Sections C & D crosses over the La Cienega overpass. There is no traffic study attached. The CSD EIR documents a far higher specific usage for La Cienega between Stocker and Jefferson Boulevard than that supplied in the study; it is inexcusable that the IS/MND omits this key, public safety-related information when same was calculated just a few years ago and is part of the public record. The IS/MND fails to consider the multiple types of users on the limited overpass crossing with morning and evening traffic in full swing. In a one hour period of morning traffic during the week, 53 cars used the overpass - almost 1 per minute. Trail user safety, particularly in the vicinity of vehicles, must be studied further with proper documentation so that the appropriate agencies can weigh in on the subject and so that the IOF landowners and the public can assess the risks and dangers and overall propriety of the mitigation measures. The foregoing are not minutiae but just a handful of the examples of glaring, material omissions in the IS/MND which cannot be allowed to pass and which do not comply with governing law.

I11

It appears that in the continued effort to rush the Park to Playa Trail concept through the evaluation and approval process, many important details are disregarded. It is time to stop the rush and accurately complete this process properly so public safety, mineral resources, and other property rights and interests are properly protected. All related parties including but limited to: Los Angeles County, Culver City and the State of California should demand that this process be given the time and attention it deserves. The completion of an EIR is a necessary requirement for this project as are full and substantive studies and discussions concerning the matters discussed above.

I12

As stated in the public hearing, I respectfully request and expect a letter of response to address all the issues included in this letter.

I13

Sincerely,

Liz K. Gosnell  
Trust Agent  
Cone Fee Trust

CC: LA County Supervisors & Elaine Lemke

Steve Rusch  
Plains Exploration & Production Company  
5640 S. Fairfax  
Los Angeles, CA 90056  
[srusch@pxp.com](mailto:srusch@pxp.com)

Steve Burke, Land Manager  
Plains Exploration & Production Company  
1200 Discovery Drive, Suite 500  
Bakersfield, CA 93309  
[sburke@pxp.com](mailto:sburke@pxp.com)

Jennifer Cox, Land Man  
Plains Exploration & Production Company  
1200 Discovery Drive, Suite 500  
Bakersfield, CA 93309  
E-mail: [jcox@pxp.com](mailto:jcox@pxp.com)

Gloria Molina – First District  
Kenneth Hahn Hall of Administration  
500 W. Temple Street, Room 856  
Los Angeles, CA 90012  
E-mail: [molina@bos.lacounty.gov](mailto:molina@bos.lacounty.gov)

Mark Ridley Thomas – Second District  
Kenneth Hahn Hall of Administration  
500 W. Temple Street, Room 866  
Los Angeles, CA 90012  
E-mail: [MarkRidley-Thomas@bos.lacounty.gov](mailto:MarkRidley-Thomas@bos.lacounty.gov)

Zev Yaroslavsky Third District  
Kenneth Hahn Hall of Administration  
500 W. Temple Street, Room 821  
Los Angeles, CA 90012  
E-mail: [zev@bos.lacounty.gov](mailto:zev@bos.lacounty.gov)

Don Knabe Fourth District  
Kenneth Hahn Hall of Administration  
500 W. Temple Street, Room 822  
Los Angeles, CA 90012  
E-mail: [don@bos.lacounty.gov](mailto:don@bos.lacounty.gov)

Michael Antonovich – Fifth District  
Kenneth Hahn Hall of Administration  
500 W. Temple Street, Room 869  
Los Angeles, CA 90012  
E-mail: [FifthDistrict@lacbos.org](mailto:FifthDistrict@lacbos.org)

Elaine Lemke, Deputy County Counsel  
Office of the County Counsel  
Kenneth Hahn Hall of Administration  
500 W. Temple Street, Room 648  
Los Angeles, CA 90012  
E-mail: [elemke@counsel.lacounty.gov](mailto:elemke@counsel.lacounty.gov)

Senator Curren D. Price, Jr.  
State Capitol, Room 2057  
Sacramento, CA 95814

James Westbrook, District Director  
Office of Senator Curren D. Price, Jr.  
Los Angeles Office  
Administrative Offices West  
700 State Dr., Suite 105  
Los Angeles, CA 90037

Assembly member Holly Mitchell  
300 Corporate Pointe,  
Suite 380  
Culver City, CA 90230

David F. McNeill  
Executive Officer  
Baldwin Hills Conservancy  
5120 Goldleaf Circle, #290  
Los Angeles, CA 90056  
[david.mcneill@bhc.ca.gov](mailto:david.mcneill@bhc.ca.gov)

Rosana Miramontes  
Deputy Attorney General  
State of California Office of the Attorney General  
California Department of Justice  
P.O. Box 944255  
Sacramento, CA 94244-2550  
[rosana.miramontes@doj.ca.gov](mailto:rosana.miramontes@doj.ca.gov)

Gloria Dangerfield  
Executive Secretary  
Baldwin Hills Conservancy  
5120 Goldleaf Circle, #290  
Los Angeles, CA 90056  
[gloria.dangerfield@bhc.ca.gov](mailto:gloria.dangerfield@bhc.ca.gov)

Gail Krippner  
Associate Governmental Program Analyst  
Baldwin Hills Conservancy  
5120 Goldleaf Circle, #290

Los Angeles, CA 90056  
[gail.krippner@bhc.ca.gov](mailto:gail.krippner@bhc.ca.gov)

Julie Alvis  
State of California Natural Resources Agency  
1416 Ninth Street, # 1311  
Sacramento, CA 95814  
[julie.alvis@resources.ca.gov](mailto:julie.alvis@resources.ca.gov)

Allan Boodnick  
Speaker Appointee  
[drallanb@mac.com](mailto:drallanb@mac.com)

Janelle Beland, Acting Director  
California State Parks  
1416 Ninth Street  
Sacramento, CA 95814  
[jbeland@parks.ca.gov](mailto:jbeland@parks.ca.gov)

Lloyd S. Dixon, Chair  
[dixon@rand.org](mailto:dixon@rand.org)

Jacquelyn DuPont-Walker  
[jdupontw@aol.com](mailto:jdupontw@aol.com)

Yolanda Gorman  
[dixon@rand.org](mailto:dixon@rand.org)

Russ Guiney, Director  
County of Los Angeles Department of Parks and Recreation  
433 S Vermont  
Los Angeles, CA 90020  
[rguiney@parks.lacounty.gov](mailto:rguiney@parks.lacounty.gov)

Robert L. Jones  
Governor Appointee  
[jonesandparker@ca.rr.com](mailto:jonesandparker@ca.rr.com)

G. Allan Kingston  
Governor Appointee  
[gakingston@ca.rr.com](mailto:gakingston@ca.rr.com)

John Laird, Secretary  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
[secretary@resources.ca.gov](mailto:secretary@resources.ca.gov)

Starlett Quarles  
[starquar@yahoo.com](mailto:starquar@yahoo.com)

Craig Sap

District Superintendent – Angeles District  
CA Department of Parks & Recreation  
Angeles District  
1925 Las Virgenes Road  
Calabasas, CA 91302-1909  
[CSAP@parks.ca.gov](mailto:CSAP@parks.ca.gov)

John Wicker, Chief Deputy  
County of Los Angeles Department of Parks and Recreation  
433 S Vermont  
Los Angeles, CA 90020  
[jwicker@parks.lacounty.gov](mailto:jwicker@parks.lacounty.gov)

Sara Amir, Manager  
Green Chemistry - Cradle to Cradle  
Pollution Prevention - Green Technology Program  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, CA 95812-0806  
[samirebr@dtsc.ca.gov](mailto:samirebr@dtsc.ca.gov)

Joan Cardellino  
Deputy Manager, South Coast Region  
State Coastal Conservancy  
California State Coastal Conservancy  
1330 Broadway, 13th Floor  
Oakland, CA 94612-2530  
[jcard@scc.ca.gov](mailto:jcard@scc.ca.gov)

Joseph T. Edmiston, Executive Director  
Santa Monica Mountains Conservancy  
570 West 26  
Los Angeles, CA 90065  
[edmiston@smmc.ca.gov](mailto:edmiston@smmc.ca.gov)

Danny Hernandez, Director  
Parks Recreation and Community Services  
City of Culver City  
4117 Overland Ave  
Culver City, CA 90230  
[daniel.hernandez@culvercity.org](mailto:daniel.hernandez@culvercity.org)

Jason Marshall  
California State Coastal Conservancy  
1330 Broadway, 13th Floor •  
Oakland, CA 94612-2530  
[Jason.Marshall@conservation.ca.gov](mailto:Jason.Marshall@conservation.ca.gov)

Patricia O'Toole  
[otoolelaw@earthlink.net](mailto:otoolelaw@earthlink.net)



Patrick Reynolds, Parks Manager  
Parks Recreation and Community Services  
City of Culver City  
4117 Overland Ave  
Culver City, CA 90230  
[Patrick.reynolds@culvercity.org](mailto:Patrick.reynolds@culvercity.org)

Barbara Romero  
Mountains Recreation and Conservation Authority  
26800 Mulholland Hwy.  
Calabasas, California 91302  
[barbara.romero@mrca.ca.gov](mailto:barbara.romero@mrca.ca.gov)

Marina Voskanian  
Division Chief - Mineral Resources Mgmt.  
California State Lands Commission  
Long Beach Mineral Resource Land Division  
200 Ocean Gate, 12th Floor  
Long Beach CA 90802-4331  
[Marina.Voskanian@slc.ca.gov](mailto:Marina.Voskanian@slc.ca.gov)

Los Angeles County Parks and Recreation  
Norma E. Garcia, Hayden Sohm, Jeremy Bok, Frank Moreno, Ralph Beltran and Shawn Mcadory  
County of Los Angeles Department of Parks and Recreation  
433 S Vermont  
Los Angeles, CA 90020

California Department of Parks and Recreation  
Sean Woods and Stephanie Campbell  
1925 Las Virgenes Road  
Calabasas, CA 91302-1909

California State Coastal Conservancy  
Joan Cardellino and Mary Small  
1330 Broadway, 13th Floor •  
Oakland, CA 94612-2530

Santa Monica Bay Restoration Commission  
Shelley Luce, Tom Ford, and Sean Bergquist  
320 West 4th Street, Suite 200.  
Los Angeles, CA 90013  
[smbrc@waterboards.ca.gov](mailto:smbrc@waterboards.ca.gov)



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294  
(323) 881-2401

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

RECEIVED  
FEB 20 2013

February 5, 2013

BY: .....

Ms. Josephine Alido, Project Manager  
Bon Terra Consulting  
225 South Lake Avenue, Suite 1000  
Pasadena, CA 91101

Dear Ms. Alido:

**NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, PARK TO PLAYA TRAIL, PROPOSING THE DESIGNATION OF EXISTING AND NEW TRAILS AS THE PARK TO PLAYA TRAIL, WITHIN PARKS AND OPEN SPACE IN BALDWIN HILLS, LOS ANGELES COUNTY AND THE CITIES OF LOS ANGELES AND CULVER CITY (FFER #201300008)**

The Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

**PLANNING DIVISION:**

**4.15 PUBLIC SERVICES**

**4.15.1 ENVIRONMENTAL SETTING**

**Fire Protection Services**

The paragraph should be corrected as follows:

The Los Angeles County Fire Department, the Los Angeles City Fire Department and the Culver City Fire Department provide fire protection services in the project area through a Mutual Aid Agreement. The nearest Los Angeles County Fire Station is Station 172 ~~58~~, located at 810 Centinela Avenue in Inglewood ~~5757 S. Fairfax Avenue in Unincorporated Los Angeles~~, approximately 2.6 mile south of the KHSRA. The nearest Los Angeles City Fire Station is Station 94, located at 4470 Coliseum Street, approximately 0.85 mile northeast of the KHSRA. The main station for the Culver City Fire Department is located at 9770 Culver Boulevard, approximately 0.6 mile west of Culver City Park.

J1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- |              |           |                  |                      |           |                      |                       |                  |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR      | HIDDEN HILLS         | LA MIRADA | MALIBU               | POMONA                | SIGNAL HILL      |
| ARTESIA      | CARSON    | DUARTE           | HUNTINGTON PARK      | LA PUENTE | MAYWOOD              | RANCHO PALOS VERDES   | SOUTH EL MONTE   |
| AZUSA        | CERRITOS  | EL MONTE         | INDUSTRY             | LAKEWOOD  | NORWALK              | ROLLING HILLS         | SOUTH GATE       |
| BALDWIN PARK | CLAREMONT | GARDENA          | INGLEWOOD            | LANCASTER | PALMDALE             | ROLLING HILLS ESTATES | TEMPLE CITY      |
| BELL         | COMMERCE  | GLENDORA         | IRWINDALE            | LAWNDALE  | PALOS VERDES ESTATES | ROSEMEAD              | WALNUT           |
| BELL GARDENS | COVINA    | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA    | PARAMOUNT            | SAN DIMAS             | WEST HOLLYWOOD   |
| BELLFLOWER   | CUDAHY    | HAWTHORNE        | LA HABRA             | LYNWOOD   | PICO RIVERA          | SANTA CLARITA         | WESTLAKE VILLAGE |
| BRADBURY     |           |                  |                      |           |                      |                       | WHITTIER         |

**LAND DEVELOPMENT UNIT:**

1. The Land Development Unit does not have any comments or requirements at this time; however, additional development will require compliance of all applicable codes, regulations, policies and ordinances.

J2

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

J3

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. A soil management plan (SMP), and a health and safety plan (HSP) is required for this project. Employees working at this project must be trained and familiar with the SMP & HSP. SMP should be used to properly address management of any contaminated soil encountered during the project activities. HSP should be used to minimize workers exposure to potential contaminants. All excavated soil must be sampled and analyzed for contaminants of concerns prior to disposal according to local and State requirements.

J4

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:ij



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

February 15, 2013

Ana Petric  
Baldwin Hills Regional Conservation Authority  
LA River Center & Gardens  
570 W. Avenue 26, Suite 100  
Los Angeles, CA 90065

Subject: Park to Playa Trail  
SCH#: 2013011021

Dear Ana Petric:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 14, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
cc: Resources Agency TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

K1

K2

**Document Details Report**  
**State Clearinghouse Data Base**

**SCH#** 2013011021  
**Project Title** Park to Playa Trail  
**Lead Agency** Baldwin Hills Regional Conservation Authority

**Type** MND Mitigated Negative Declaration

**Description** The project would designate some of the existing trails and would develop new trails that would be known as the Park to Playa Trail. As part of this Project, the designated trail alignment would be improved through the resurfacing, widening, and realigning of some sections of the existing trails; by providing fencing, wayfinding signs, and trailhead facilities (i.e., information kiosks, shade structures, benches, bike racks, and trash cans); landscaping with native plants and restoring habitat in disturbed areas adjacent to the trail; and reconstructing sidewalks, bike lanes, and a drainage channel.

**Lead Agency Contact**

**Name** Ana Petric  
**Agency** Baldwin Hills Regional Conservation Authority  
**Phone** 323 221-9944 x107 **Fax**  
**email**  
**Address** LA River Center & Gardens  
570 W. Avenue 26, Suite 100  
**City** Los Angeles **State** CA **Zip** 90065

**Project Location**

**County** Los Angeles  
**City** Culver City, Los Angeles, City of  
**Region**  
**Lat / Long** 34° 0' 30.85" N / 118° 22' .99" W  
**Cross Streets** La Brea Avenue and Stocker Street  
**Parcel No.**  
**Township** 2S **Range** 14W **Section** 17 **Base** SBB&M

**Proximity to:**

**Highways** I-10, SR-187  
**Airports**  
**Railways** Metro Light Rail  
**Waterways** Ballona Creek  
**Schools** Windsor Hills ES  
**Land Use** Parks and open space/Open Space, Residential, Agriculture and Public Facilities/Open Space, Residential, and Public Facilities

**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Landuse

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission; Department of Toxic Substances Control

**Date Received** 01/16/2013 **Start of Review** 01/16/2013 **End of Review** 02/14/2013





Department of Toxic Substances Control

Matthew Rodriguez  
Secretary for  
Environmental Protection

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630

Edmund G. Brown Jr.  
Governor

February 12, 2013

012013  
2/14/13  
e

RECEIVED

FEB 12 2013

STATE CLEARING HOUSE

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

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION FOR THE  
PARK TO PLAYA TRAIL PROJECT, (SCH#), LOS ANGELES COUNTY, CALIFORNIA

2013011021

Dear Ms. Alido:

The Department of Toxic Substances Control (DTSC) has received your submitted Initial Study (IS) and a draft Mitigated Negative Declaration (MND) for the above-mentioned project. The following project description is stated in your document:

"The Proposed Project would designate some of the existing trails and would develop new trails that would be known as the Park to Playa Trail. The proposed trail improvements would be made along the designated Park to Playa Trail to provide a trail that meets the minimum design standards for recreational trails. The Proposed Project designates the alignment of the Park to Playa Trail that would lead from the parks in the Baldwin Hills area to the Pacific Coast through the Ballona Creek Bike Path and Marvin Braude Bike Path. The current project is the eastern portion of the Park to Playa Trail, which would be located in the Baldwin Hills area at the western section of Los Angeles County in the Cities of Los Angeles and Culver City and unincorporated County land. Land uses surrounding the proposed trail alignment include public park areas, open spaces; and residential, commercial, and industrial areas. The applicable zoning for the trail alignment includes Heavy Agriculture, Single Family Residence, Limited Multiple Residence, Commercial Planned Development, and Residential Planned Development"

Based on the review of the submitted document DTSC has the following comments:

- 1) The MND should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
  - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

- EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
  - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
  - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
  - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
  - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
  - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
  - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The MND should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.
- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the MND.
- 4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken

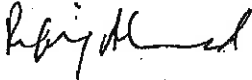
during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

- 5) Project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- 6) If the project area was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.
- 7) Human health and the environment of sensitive receptors should be protected during the field activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
- 9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see [www.dtsc.ca.gov/SiteCleanup/Brownfields](http://www.dtsc.ca.gov/SiteCleanup/Brownfields), or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

Ms. Josephine Alido  
February 12, 2013  
Page 4

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at [rahmed@dtsc.ca.gov](mailto:rahmed@dtsc.ca.gov), or by phone at (714) 484-5491.

Sincerely,



Rafiq Ahmed  
Project Manager  
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov).

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
Attn: Nancy Ritter  
[nritter@dtsc.ca.gov](mailto:nritter@dtsc.ca.gov)

CEQA # 3708