

# **ENVIRONMENTAL ANALYSIS**

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This Re-circulated Draft Kenneth Hahn State Recreation Area (KHSRA or the park) General Plan Amendment, with all its elements, constitutes an environmental impact report (EIR), as required by Public Resources Code Sections 5002.2 and 21000 et. seq. This EIR is for the approval of the KHSRA General Plan Amendment. The discussion of impacts is commensurate with the level of specificity of the General Plan Amendment. Site specific development and resource management projects for KHSRA will be subject to subsequent project-level CEQA compliance and to the permitting requirements and approval of other agencies, such as the Department of Fish and Game, Caltrans, the State Water Resources Control Board, and others as specific projects are proposed.

The General Plan Amendment and EIR constitute the first tier of environmental review. “Tiering” in an EIR prepared as part of a General Plan that allows agencies to address broad environmental issues at the general planning stage, followed by more detailed examination of actual development projects (that are consistent with the plan) in subsequent EIRs or negative declarations. Later EIRs incorporate, by reference, the general discussions from the broader EIR (the General Plan) and concentrate solely on the issues specific to the later projects (Public Resources Code Section 21093: State CEQA Guidelines, CCR Section 15152).

The General Plan Amendment, described in The Plan portion of this document, proposes management zoning, unit-wide management goals and guidelines, and specific area goals and guidelines. Implementation of the General Plan Amendment would apply management zoning to the park which could allow for the development of new park-related facilities. Impacts discussed in this section primarily consist of those commonly associated with visitor use and facility development and operation.

## **INDEX**

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## **SUMMARY**

The General Plan Amendment, described in The Plan portion of this document, proposes management zoning, unit-wide management goals and guidelines, and specific area goals and guidelines. Implementation of the General Plan Amendment would apply management zoning to the park which would provide readily identifiable boundaries for specific types of activities,

programs, and developments, reducing the potential for the introduction of inappropriate activities into prime resource areas. Unit-wide and specific area goals and guidelines require further data collection, evaluation, and additional specific management planning and resource impact identification prior to new construction or reconstruction. The Plan also includes the development of specific plans, for example natural and cultural resource management, that would be undertaken prior to development, further reducing the potential for the introduction of inappropriate activities into prime resource areas.

## AREAS OF KNOWN CONTROVERSY

Eight public meetings were held between July 11, 2000 and March 17, 2001 to solicit public comments on issues. The public voiced opinions and desires regarding the following issues:

1. Mixture of natural open space and developed recreational areas
  - A. Kinds of active recreation;
  - B. Kinds of open space activities
2. Facilities
  - A. Cultural facilities
  - B. Education facilities
  - C. Public access hours limits
  - D. Parking areas

The results of these public meetings informed the development of The Plan.

The Notice of Preparation for the General Plan was circulated to state and local planning agencies in July 2001. Three letters were received in response to the NOP, as summarized below.

1. The California Department of Fish and Game has requested:
  - A. A complete assessment of flora and fauna within and adjacent to the project area, with an emphasis upon identifying endangered, threatened, and locally unique species and sensitive habitats;
  - B. A thorough discussion of direct, and cumulative impacts expected to adversely impact biological resources, with specific measures to offset such impacts;
  - C. A range of alternatives which avoid or minimize impacts to sensitive biological resources;
  - D. Mitigation measures should be on-site if feasible;
  - E. If there is potential for “take of an endangered species, a CESA permit would be necessary;
  - F. Any impacts to wetlands and riparian habitats would need consultation with DFG to assure there would be “no net loss” of habitat values or acreage.

2. The California Department of Transportation has requested that a traffic study be done to evaluate the project's overall impact on the State Transportation System. A traffic study should include, but not be limited to: trip generation, trip distribution, traffic volumes and level-of-service calculations for existing conditions and traffic projections and level-of-service calculations for future conditions for all major intersections in the study area. They recommend that construction related truck trips on State highways be limited to off-peak commute hours.
3. The Native American Heritage Commission is requesting that the appropriate Information Center is contacted for a record search. If an archaeological inventory survey is required, a professional report detailing the findings and recommendations would be prepared and would include appropriate mitigation measures. Contact the Native American Heritage Commission for a Sacred Lands File Check. Include provisions for accidental discovery of archaeological resources in the project.

As a first tier of planning for the park, this General Plan Amendment does not address all of these project specific comments in detail. Although The Plan sets the overall goals for park management and provisions for public use, it does not define project level development specifics or the methods for attaining resource protection goals. These will be part of future planning steps, such as the layout and design of facilities or specific resource management plans and processes.

The objectives of the Environmental Analysis section are to identify, where possible, the significant environmental impacts of implementing the General Plan Amendment and to define generalized mitigation criteria and policy-level alternatives. Once the General Plan Amendment is approved and adopted, the Department could prepare management and area development plans as required and as staff and funding allow. These would address such issues as vegetation and fire management, and site development plans. The area development plans will provide specific information on resources and design considerations, including layout, facilities' configuration, capacities, etc., within designated areas of the park.

Implementation of area development plans will generally be carried out as the first phase of major and minor capital outlay projects. At each planning level (whether a management plan, an area development plan, or major or minor capital outlay project), the plan or project will be subject to further, more detailed environmental review to determine if it is consistent with the General Plan Amendment and to identify any significant environmental impacts and mitigation measures that would be specific to the project. Mitigation generally requires resource specialists to evaluate the scope of work, identify the cause of the impacts, and specify measures to avoid or reduce the impacts to a less-than-significant level. More detailed environmental review will be possible at those levels of planning, where facility size, location, and capacity can be explicitly delineated, rather than at the General Plan level.

The California Department of Parks and Recreation (Department) prepared a Draft General Plan Amendment and EIR in September 2001 for an approximate 1,400 acre area that included the existing park and Vista Pacifica Scenic Site, along with adjacent privately and publicly held open space lands (such as the Ladera Ballfields and Norman O. Houston Park and the existing oilfields). The Draft General Plan Amendment and EIR was issued for public review in

September 2001 and 17 comment letters were received (see the section entitled “Comments Received”). In response to comment letters, and in response to Department planning guidelines issued in January 2002, the Department has prepared this Revised Draft KHSRA General Plan Amendment and EIR that specifically addresses Department-owned parklands and the County-owned Vista Pacifica parcels within the larger Baldwin Hills area.

## SUMMARY OF IMPACTS AND MITIGATION MEASURES

Implementation of the General Plan Amendment would apply management zoning to the park that could result in the addition of new public use and maintenance facilities and increased public use of the park. If new public uses and facilities were to be implemented, the increased public access and use, operations, maintenance, and construction activities could be associated with potential impacts. At a program-level, these impacts were found to be at less than significant levels or to be mitigated to a less than significant level with mitigation measures identified in the analysis. As noted above, more detailed examination of actual development projects (that are consistent with the plan) would be required at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

### ***LAND USE***

Potential programmatic land use impacts associated with actions that would increase public use were determined to be less than significant and no mitigation is required. Potential increases in public use and the addition of new facilities would not disrupt or divide the physical arrangement of established surrounding uses, would be compatible with adjacent land uses, would not conflict with established recreational educational, religious, or scientific uses and would not affect the existing character of the vicinity. In addition, implementation of the General Plan Amendment would not affect mineral operations on adjacent lands. There are no agricultural resources in the park.

### ***WATER QUALITY AND HYDROLOGY***

Implementation of the General Plan Amendment could result in increased impervious surfaces that would increase runoff and could exceed the capacity of the existing drainage system. Construction and operation activities and increased public use could result in the addition of pollutants and sedimentation to surface water runoff and result in erosion. If wetlands are located within KHSRA, construction activities and the location of park facilities could result in wetlands impacts. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

Implementation of the General Plan Amendment would not result in groundwater impacts or include structures within the 100-year floodplain and no mitigation is required.

### ***GEOLOGY, SOILS AND SEISMICITY***

New facilities and improvements to existing facilities that could be implemented as a result of the General Plan Amendment would be subjected to strong ground shaking in the event of a nearby earthquake, which would expose people or structures to adverse effects, including the risk of loss, injury or death as a result of seismic ground failure, liquefaction, earthquake induced settlement, or landslides. The location of facilities in the vicinity of the adjacent oilfield could result in ground subsidence impacts. Construction and maintenance activities and increased public use could result in soil erosion, particularly where located in steep areas. In addition, some soils at KHSRA may be unsuitable to support new facilities. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***BIOLOGICAL RESOURCES***

Implementation of the proposed General Plan Amendment could result in the addition of new facilities and improvements to existing facilities that could affect native habitats and species. Localized, minor, short-term, to long-term effects to special status species could occur from construction of potential facilities. Effects would be related to heavy equipment and construction activities and could include direct removal of habitat, harassment or mortality, and introduction and spread of non-native species. In addition, increased activity associated with public use of the park could be associated with the transport of invasive species by visitors onto park land at a greater rate than occurs at present. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***CULTURAL RESOURCES***

KHSRA is located within an area known to contain cultural resources and potential construction activities could result in impacts to archaeological and paleontological resources, and related to the potential discovery of human remains. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

Implementation of the General Plan Amendment would not result in historic resources impacts and no mitigation is required.

### ***AESTHETICS***

Implementation of the General Plan Amendment could result in aesthetics impacts related to the addition of new facilities, ground disturbance activities, and trespassing and improper use of public access areas that could lead to litter, disturbed vegetation, and damage to Park facilities and resources. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***RECREATION***

Implementation of the General Plan Amendment could result in the deterioration of KHSRA facilities or nearby recreation facilities, if facilities are not sized to accommodate potential use levels, are not operated and maintained or operated properly, or if expected use levels are exceeded. A mitigation measure included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***TRAFFIC AND CIRCULATION***

Implementation of the General Plan Amendment could result in increased traffic that significantly impacts the local and regional circulation networks in the project vicinity. In addition, implementation of the Plan could result in pedestrian and bicycle safety hazards and could create an unmet demand for parking. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***PLANS AND POLICIES***

Implementation of the General Plan Amendment could result in plans and policies impacts associated with existing land use and zoning designations. Mitigation Measures included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***UTILITIES AND PUBLIC SERVICES***

Implementation of General Plan Amendment management actions would generally not require expansion or improvement of utilities and public services. Any system expansions required for individual actions are expected to be minimal, and construction and operation of expansions would not likely result in significant effects on the physical environment. Overall, the General Plan Amendment is beneficial to public service and utility systems, as it will result in efficiency improvements to these systems. Full implementation of the Plan could result in some increases in demand for fire protection services, but overall these increases would be minimal. However, potential fire protection services impacts could occur if new facilities are not designed properly and proper access and water flow is not provided. A mitigation measure included in this EIR would reduce potential impacts to less than significant at the program-level.

### ***AIR QUALITY***

Implementation of the General Plan Amendment could result in the construction of new facilities, resulting in potential air quality impacts associated with emissions from construction equipment and vehicles and from the generation of dust. Implementation of the Plan could also result in air quality impacts associated with increased motor vehicle emissions due to increases in visitation to the park and jobs related to the administration, operations, and maintenance of the park. Potential air quality impacts could also occur as a result of implementing prescribed burns at KHSRA. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

## ***NOISE***

Implementation of the General Plan Amendment could result in noise impacts associated with construction activities that exceeds the regulatory requirements of Los Angeles County or the Cities of Culver City and Los Angeles. Potential noise impacts could also be associated with Plan implementation, depending on the size and location of potential facilities and uses through the addition of new noise sources. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

## ***HAZARDS AND HAZARDOUS MATERIALS***

Implementation of the proposed General Plan Amendment could result in construction activities that include the use of hazardous materials, expose hazardous waste that may be present at construction sites, or create fire hazards. Greater human presence and accessibility to remote areas of the park would not result in significant risk of illegal dumping of wastes. The overall amount of pesticides and fertilizers used and stored at KHSRA could increase somewhat from existing levels, but would not be considered a significant impact. Potential increases in public use and an associated increase in traffic within the park could result in runoff from oil, grease and fuel products as well as accidental releases of hazardous materials. Mitigation measures included in this EIR would reduce potential impacts to less than significant at the program-level.

## **ENVIRONMENTAL ISSUES TO BE RESOLVED**

There are no environmental issues to be resolved. This EIR analyzes, at a program level, the potential environmental impacts of a broad range of policies and management actions included in the KHSRA General Plan Amendment. The EIR includes mitigation measures to reduce potential impacts to less than significant at the program-level. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary. Generally, further environmental review would be necessary if new significant environmental effects beyond those identified in this EIR would occur as a result of changes in the project description (or further detail becomes known), new circumstances or information arise, or if new mitigation measures or alternatives that would reduce one or more significant effects of the project are found to be feasible but the Department declines to adopt the measure or alternative (CEQA Guidelines Section 15162).

## **PROJECT DESCRIPTION**

The Introduction and Plan sections of the General Plan Amendment include proposed park development and operations, and designate appropriate land uses and resource management. Those sections include a project location map, regional map, statement of plan objectives, and a description of the plan's technical, economic, and environmental characteristics. The sections constitute the project description. As described above, the Department will use this EIR in its

decision-making process regarding Plan approval and in the approval and development of subsequent project-specific proposals. If the General Plan Amendment were fully implemented as written, the following proposals would be carried out:

- **Management Zoning.** The Plan would apply management zoning to the park to provide readily identifiable boundaries for specific types of activities, programs, and developments, reducing the potential for the introduction of inappropriate activities into prime resource areas. Management zones establish allowable use intensities based on a resource management monitoring program that would prevent visitor-related impacts to resources from exceeding the threshold of significance.
- **Unit-wide Management Goals and Guidelines.** A consistent set of goals and guidelines to be applied to on-going park maintenance and operations as well as new facility development throughout the park. This includes the goal to restore existing dilapidated resource areas to healthy ecosystems.
- **Specific Area Goals and Guidelines.** Goals and guidelines to be applied to on-going park maintenance and operations as well as new facility development within specific portions of the park. This includes improve water quality of runoff from the site by means of catchment basins or other methods, to collect, retain, and treat runoff from the site.

## ENVIRONMENTAL SETTING

The section entitled “Existing Conditions” describes existing KHSRA and adjacent land uses, hydrology and water quality, geology, soils and seismicity, biological resources, cultural resources, aesthetics, recreation, traffic and circulation, plans and policies, and utilities and public services.

## AIR QUALITY

The project site is located in the western portion of Los Angeles County and is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD), within the South Coast Air Basin (SCAB). The SCAB encompasses 6,745 miles and includes some portions of San Bernardino, Riverside, Los Angeles, and Orange Counties. The SCAQMD stretches from the Pacific Ocean in the west, the Angeles National Forest to the north, Orange County to the south, and Riverside and San Bernardino Counties to the east. KHSRA encompasses portions of the City of Culver City, the City of Los Angeles, and unincorporated areas of Los Angeles County.

## *REGIONAL CLIMATE*

The SCAB is primarily a coastal plain with interconnected valleys and low hills progressing into high mountain ranges on the perimeter. The region is located within a semi-permanent high-pressure system that lies off the coast. As a result, the weather is mild, tempered by a daytime sea breeze and a nighttime land breeze. This mild climate is infrequently interrupted by periods of

extremely hot weather, winter storms, and Santa Ana winds. Rainfall in the SCAB is primarily restricted to November through April, with rainfall totals being highly variable from year to year.

The SCAB has a low average wind speed of 5.7 miles per hour (mph) in downtown Los Angeles. Inland areas record slightly lower wind speeds, while coastal areas average approximately 2 mph greater than downtown. Because of the low average wind speed, air contaminants in the SCAB don't readily disperse. On spring and summer days most pollution is moved out of the SCAB through mountain passes or is lifted by the warm vertical currents produced by the heating of the mountain slopes. From late summer through the winter months, lower wind speeds and the earlier appearance of offshore breezes combine to trap pollution in the SCAB.

The SCAB is hampered by the presence of a persistent temperature inversion layer, which limits vertical dispersion of air pollutants. In a normal atmosphere, temperature decreases with altitude. In an inversion condition temperature increases with altitude. As the pollution rises it reaches an area where the ambient temperature exceeds the temperature of the pollution. This causes the pollution to sink back to the surface and traps air pollution near the surface.

In summer, the longer daylight hours and bright sunshine combine to cause a reaction between hydrocarbons and oxides of nitrogen to form ozone. In winter, the greatest pollution problems are carbon monoxide and nitrogen oxides, which are trapped and concentrated by the inversion layer.

### ***EXISTING AIR QUALITY***

**Ozone (O<sub>3</sub>).** The SCAB is in non-attainment for both the federal and state ozone standards. Ozone is a secondary pollutant produced through a series of photochemical reactions involving reactive organic compounds (ROC) and nitrogen oxides (NO<sub>x</sub>). Ozone creation requires ROC and NO<sub>x</sub> to be available for approximately three hours in a stable atmosphere with strong sunlight. Ozone is a regional air pollutant because it is not emitted directly by sources, but is formed downwind of sources generating ROC and NO<sub>x</sub> emissions.

The federal and State Clean Air Acts require that management plans be developed for areas designated as non-attainment to establish strategies to achieve compliance. Because California's regulations are more stringent than the federal standard, two ozone plans apply to the project vicinity.

Ozone effects include eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. Ozone is also damaging to vegetation and untreated rubber. The state one-hour ozone standard in the SCAQMD was exceeded 5 days in 1996 and at least once per year from 1997 through 2000 (Table 4-1).

**Carbon Monoxide (CO).** The SCAB is in non-attainment for both federal and state carbon monoxide standards. Carbon monoxide is a non-reactive pollutant that is a product of incomplete combustion. Ambient carbon monoxide concentrations usually follow the spatial and temporal distributions of vehicular traffic and are also influenced by meteorological factors such as wind

**TABLE 4-1  
PROJECT AREA AIR POLLUTANT SUMMARY, 1996-2001<sup>a</sup>**

<u>Pollutant</u>	<u>Standard<sup>b</sup></u>	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>
<u>Ozone (O<sub>3</sub>)</u>							
Highest 1-hr average, ppm <sup>c</sup>	0.09	<u>0.14</u>	<u>0.11</u>	<u>0.13</u>	<u>0.12</u>	<u>0.10</u>	<u>0.10</u>
Number of standard excesses <sup>d</sup>		13	6	7	4	2	1
<u>Carbon Monoxide (CO)</u>							
Highest 8-hr average, ppm <sup>c</sup>	9.1	4.3	4.2	4.5	3.6	4.3	4.0
Number of standard excesses <sup>d</sup>		0	0	0	0	0	0
<u>Nitrogen Dioxide (NO<sub>2</sub>)</u>							
Highest 1-hr average, ppm <sup>c</sup>	0.25	0.18	0.14	0.13	0.13	0.16	0.11
Number of standard excesses <sup>d</sup>		0	0	0	0	0	0
<u>Particulate Matter-10 Micron (PM<sub>10</sub>)</u>							
Highest 24-hr average, µg/m <sup>3c</sup>	50	<u>101</u>	<u>79</u>	<u>66</u>	<u>69</u>	<u>74</u>	<u>75</u>
Number of standard excesses <sup>d,f</sup>		5	4	7	6	9	6
Annual Geometric Mean, µg/m <sup>3c</sup>	30	29	<u>33</u>	<u>30</u>	<u>33</u>	<u>33</u>	<u>36</u>
Violation		No	Yes	Yes	Yes	Yes	Yes

Note: Underlined values indicate an excess of applicable standard. NA = Not Available.

- a Data are from the SCAQMD monitoring station located at the Veterans Administration Hospital monitoring site in West Los Angeles. 1996 air quality data is incomplete.
- b State standard, not to be exceeded.
- c ppm - parts per million; µg/m<sup>3</sup> - micrograms per cubic meter.
- d Refers to the number of days in a year during which at least one excess was recorded.
- e PM<sub>10</sub> data from Hawthorne monitoring station at 5234 120<sup>th</sup> Street.
- f Measured every six days.

Source: South Coast Air Quality Management District, 1996-2001

speed and atmospheric mixing. Under inversion conditions, carbon monoxide concentrations may be distributed more uniformly over an area out to some distance from vehicular sources.

**Nitrogen Oxides (NO<sub>x</sub>).** The SCAB is a maintenance area for the federal and state NO<sub>x</sub> standards, which means it had once been in non-attainment. There are two oxides of nitrogen which are important in air pollution: nitric oxide (NO) and nitrogen dioxide (NO<sub>2</sub>). NO and NO<sub>2</sub> are both emitted from motor vehicle engines, power plants, refineries, industrial boilers, aircraft and railroads. NO<sub>2</sub> is primarily formed when NO reacts with atmospheric oxygen. NO<sub>2</sub> gives the air the “whiskey brown” color associated with smog. Since NO<sub>x</sub> emissions contribute to ozone generation, NO<sub>x</sub> emissions are regulated through the O<sub>3</sub> Attainment Plans.

**Particulate Matter (PM<sub>10</sub>).** The SCAB is in non-attainment for the federal and state PM<sub>10</sub> standard. PM<sub>10</sub> is particulate matter that is smaller than 10 microns in diameter. Particulate matter less than 10 microns in diameter can be inhaled deep into the lungs and cause adverse health effects. PM<sub>10</sub> in the atmosphere results from many kinds of dust and fume producing industrial and agricultural operations, fuel combustion and atmospheric photochemical reactions. Some

sources of particulate matter such as demolition and construction activities are more local in nature while others such as vehicular traffic have a more regional effect.

Particulate matter contributes to pollution in two ways, fugitive dust, and exhaust emissions. Fugitive dust is produced from activities that disturb soil such as grading, digging, or just driving on an unpaved road. Particulate matter from exhaust gasses is produced from incomplete combustion resulting in soot formation. Both forms of particulate matter are accounted for in this analysis.

**Toxic Air Contaminants (TAC).** Toxic air contaminants (TAC) are pollutants known or suspected to cause cancer or other serious health effects such as birth defects. TAC may also have significant adverse environmental and ecological effects. Examples of TAC include benzene, diesel particulate, hydrogen sulfide, methylchloride, 1,1,1-trichloroethane, toluene, and metals such as cadmium, mercury, chromium, and lead.

Health effects from TAC vary depending on the specific toxic pollutant but may include cancer, immune system damage, as well as neurological, reproductive, developmental, and respiratory problems. According to the EPA, approximately 50% of the TAC we are exposed to comes from mobile source emissions. EPA and CARB are both concerned over diesel particulate matter emissions. The EPA has published its final rule to control emissions of hazardous air pollutants from mobile sources in the March 29, 2001 Federal Register. The CARB approved a comprehensive diesel risk reduction plan in September 2000.

### **Existing Air Pollution Sources**

Air quality in the vicinity of the park is affected by emissions from motor vehicle traffic within the park, on adjacent roadways, and within adjacent land uses such as oilfields. In addition, operation of the oilfields includes generators and drill rigs that could be associated with additional emissions in the vicinity of KHSRA. Generally wind blows polluted air east and so the project area has some of the best air quality in the SCAB.

### ***SENSITIVE RECEPTORS***

Some land uses are considered more sensitive to air pollution than others due to the population groups or activities involved. SCAQMD includes in its list of sensitive receptors residence, schools, playgrounds, childcare centers, convalescent homes, retirement homes, rehabilitation centers, and athletic facilities. Sensitive population groups include children, the elderly, and the acutely and chronically ill, especially those with cardio-respiratory diseases. Residential areas are also considered to be sensitive to air pollution because residents tend to be home for extended periods of time, resulting in sustained exposure to any pollutant present. Industrial and commercial districts are less sensitive to poor air quality because exposure periods are shorter and workers in these districts are, in general, the healthier segment of the public.

There are no schools, hospitals, or churches within the boundaries of the park. However, KHSRA and nearby public use areas include several playgrounds. Suburban residential developments border the park to the north and to the east. Approximately 15 schools are located in the neighborhoods within 1.5 miles of the park and it shall be assumed that some churches are also situated within a 1-mile radius of the park. The nearest hospital is the Brotman Medical Center on Venice Blvd in Culver City, approximately 0.75 miles west of the Vista Pacifica Scenic Site.

## NOISE

### *INTRODUCTION TO NOISE PRINCIPLES AND DESCRIPTORS*

Environmental noise is usually measured in A-weighted decibels (dBA)<sup>1</sup>. Environmental noise typically fluctuates over time, and different types of noise descriptors are used to account for this variability. Typical noise descriptors include the energy-equivalent noise level (Leq), the day-night average noise level (DNL), and the Community Noise Equivalent Level (CNEL)<sup>2</sup>. The DNL and CNEL descriptors are commonly used in establishing noise exposure guidelines for specific land uses.

Noise levels are measured on a logarithmic scale, instead of a linear scale. On a logarithmic scale, the sum of two noise sources of equal loudness in 3 dBA greater than the noise generated by just one of the noise sources (e.g., a noise source of 60dBA plus another noise source of 60 dBA generate a composite noise level of 63 dBA). To apply this formula to a specific noise source, in areas where existing levels are dominated by traffic, a doubling in the volume of the traffic will increase ambient noise levels by 3 dBA. A 3-dBA increase is the smallest change in noise level detectable to the average person. An increase of 10 dBA is perceived as a doubling of noise.

The noise experienced at a receptor depends on the distance between the source and the receptor, the presence or absence of noise barriers and other shielding features, and the amount of noise attenuation (lessening) provided by the intervening terrain. For line sources, such as vehicular traffic, noise decreases by about 3.0 to 4.5 dBA for every doubling of the distance from the roadway. For point or stationary sources, such as electric motors or construction equipment, a noise reduction of 6.0 to 7.5 dBA is experienced for each doubling of the distance from the source.

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<sup>1</sup> A decibel (dB) is a logarithmic unit of sound energy intensity. Sound waves exert a sound pressure (commonly called "sound level"), measured in decibels. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response of the human ear at commonly encountered noise levels. The highest dBA reported in a given period of time is known as the maximum noise level (Lmax). All of the noise levels reported herein are "A-weighted" unless stated otherwise.

<sup>2</sup> Leq, the energy equivalent noise level (or "average" noise level), is the equivalent steady-state continuous noise level which, in a stated period to time, contains the same acoustical energy as the time-varying sound level actually measured during the same period. DNL, the day-night average noise level, is a weighted 24-hour average noise level. With the DNL descriptor, noise levels between 10:00 p.m. and 7:00 a.m. are adjusted upward by ten dBA to take into account the greater annoyance of nighttime noise as compared to daytime noise. The CNEL is calculated in a similar way, but an additional 5 dBA are added to the noise levels in the evening hours between 7:00 p.m. and 10:00 p.m.

## ***EXISTING NOISE ENVIRONMENT***

Noise is defined as unwanted sound. Natural sounds within the Kenneth Hahn State Recreation Area (such as flowing water, animals, and rustling tree leaves) are not considered to be noise. Existing noise within the park results from mechanical sources, such as motor vehicles, generators, and overhead aircraft and from human activities, such as talking and yelling.

Some noise heard within the park results from automobiles, recreational vehicles, and trucks accessing the park and traveling in adjacent areas, such as roadways and oilfields. Noise from these motor vehicles is “loudest” immediately adjacent to the roadways but, due to generally low background sound levels, can be audible a long distance from the roads. Atmospheric effects such as wind, temperature, humidity, topography, rain, and fog can significantly affect the presence or absence of motor vehicle noise in various areas of the park.

Other mechanical sources of noise within the park include construction equipment, generators, radios, and Park maintenance equipment (i.e., mowers and chainsaws). The frequency of source use and the location of these sources vary both by season and reason for use.

The noise environment in and around the park is expected to be relatively low because it is not highly developed and does not include significant stationary sources.

## ***SENSITIVE RECEPTORS***

Some land uses are considered more sensitive to ambient noise levels than others are, due to the amount of noise exposure (in terms of both duration and insulation from noise) and the types of activities typically involved. Residential areas, schools, hospitals, and parks generally are more sensitive to noise than commercial and industrial land uses. There are no schools, hospitals, or churches within the boundaries of the park. Suburban residential developments border the park to the north and to the east. In addition to sensitive receptors recreational within KHSRA, the Ladera Ballfields are located to the southwest of the park, a Culver City Park is to the west of the Vista Pacifica Scenic Site, Norman O. Houston Park, is located immediately across from the southeast corner of the park (at Five Corners), and Ruben Ingold Park is to the east of Norman O. Houston Park. In addition to sensitive land uses within and in close proximity to the park, residences and other sensitive land uses are located along roadways providing access to and from the park.

## **HAZARDS AND HAZARDOUS MATERIALS**

### ***DEFINITIONS***

Hazardous materials and hazardous waste are defined by their levels of toxicity, ignitability, corrosivity, and reactivity. When excavated, soils with concentrations of contaminants higher than certain acceptable levels must be handled and disposed as hazardous waste. The *California*

*Code of Regulations*, Title 22, §66261.20-24 contains technical descriptions of characteristics that would cause a soil to be classified as a hazardous waste.

## ***REGULATORY SETTING***

### **Hazardous Materials and Waste Handling**

The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC) regulates the generation, transport, treatment, storage, and disposal of hazardous waste. Remediation of contaminated sites is performed under the oversight of Cal-EPA and with the cooperation of the Regional Water Quality Control Board (RWQCB) and the local fire department. At sites where contamination is suspected or known to occur, a site investigation and remediation plan may be required. For typical projects, actual site remediation is performed either before or during the construction phase of the project.

### **Worker Safety**

Federal and state laws provide occupational safety standards to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal-OSHA) and the federal Occupational Safety and Health Administration (OSHA) are the agencies responsible for assuring worker safety in the workplace. Cal-OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. A Site Safety Plan must be prepared to protect workers at sites with known contamination. The Site Safety Plan establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site (NIOSH/OSHA/USCG/EPA, 1985).

## ***BACKGROUND AND CURRENT SITE CONDITIONS***

The park generally contains wildlands and open space for passive recreation, playgrounds, manicured lawns/landscaping, a fishing lake, and hiking trails. The park also has eight large barbecue pits and 60 small ones and it can be assumed that lighter fluid and other flammable materials are used at the barbecue pits. Park maintenance includes the use of fertilizers and pesticides, motor oil, and gasoline, which are stored at a park maintenance yard that is located to the south of existing public use areas. Diesel fuel is occasionally used at the park and is stored at the maintenance facility for short periods of time.

There are no locations within the park included on the California *Hazardous Waste and Substances Sites List* (Department of Toxic Substances Control, 1998). However, an area of contaminated soil was identified at KHSRA southeast of the maintenance yard, the source and type of contamination is not known. This area is not used for public access. A former dumpsite is located on the southeastern portion of the Vista Pacifica Scenic Site. During grading activities for the residential development formerly proposed at the Vista Pacifica Scenic Site, hazardous materials were not located at the dumpsite.

The 700-acre Inglewood oil field is located immediately west and south of KHSRA. As of 2000 there were approximately 1,200 wells in the oil field, consisting of 430 active wells, 215 inactive or shut-in wells, and about 530 abandoned wells. This oil field is on land within unincorporated Los Angeles County and private oil companies operate the wells. Hundreds of abandoned wells predate requirements for wells to be sealed under State supervision. There is a possibility of hydrocarbon (gas) seeps for those early vintage wells abandoned without State-approved sealing. An area of contaminated soil was detected south of the Vista Pacifica Scenic Site, likely associated with previous oilfield activities.

## **ENVIRONMENTAL IMPACT**

### **SIGNIFICANT ENVIRONMENTAL EFFECTS**

#### ***LAND USE***

##### **Threshold**

A significant land use impact would be expected to occur if the project would:

- Substantially disrupt or divide the physical arrangement of an established community.
- Substantially conflict with established recreational, educational, religious, or scientific uses.
- Have a substantial impact on the existing character of the vicinity.
- Convert Farmland or otherwise conflict with agricultural uses.
- Loss of availability of mineral resources.

Land use impacts are evaluated with respect to compatibility of the proposed General Plan Amendment with the existing land uses and the potential effect the proposed policies and actions would have on land use patterns in the project vicinity.

##### **Impacts**

Potential programmatic land use impacts associated with actions that would increase public use were determined to be less than significant when measured against the significance criteria and are discussed in the section below entitled “Effects Found Not to be Significant.”

#### ***WATER QUALITY AND HYDROLOGY***

##### **Threshold**

A significant water quality and/or hydrology impact would be expected to occur if the project would:

- Violate any water quality standards or waste discharge requirements.
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there should be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems.
- Otherwise substantially degrade water quality.
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

## Impacts

### **Impact Hydro-1. Potential Runoff and Downstream Flooding Impacts**

Implementation of the General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities. If implemented, the facilities would result in increased impervious surfaces<sup>3</sup> that would increase runoff and could exceed the capacity of the existing drainage system<sup>4</sup>. Implementation of Mitigation Measure Hydro-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation

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<sup>3</sup> Storm water runoff is influenced by rainfall intensity, ground surface permeability, watershed size and shape, and physical barriers. The introduction of impermeable surfaces greatly reduces natural infiltration, allowing for a greater volume of runoff. In addition, paved surfaces and drainage conduits can accelerate the velocity of runoff, concentrating peak flows in downstream areas faster than under natural conditions. Significant increases to runoff and peak flow can overwhelm drainage systems and alter flood elevations in downstream locations. Finally, increased runoff velocity can promote scouring of existing drainage facilities, reducing system reliability and safety.

<sup>4</sup> Drainage structures installed to accommodate storm water flow for surface streets in Los Angeles County are sized to convey a 50-year flood event. This level of protection assumes that more severe storm events will cause temporary flooding, which is an acceptable risk for streets.

information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Hydro-2. Potential Water Quality Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and increased public use. Increased development<sup>5</sup> can increase the erosion potential of the area. Overuse by park visitors can destroy vegetation and increase sediment loads to receiving water bodies. In addition, construction activities would increase the potential for spills of hazardous materials and would expose soils to wind and rain erosion. Application of pesticides to landscaped areas would decrease runoff water quality. Ballona Creek is an impaired water body subject to TMDLs to be established by the RWQCB. Source control measures for new developments within the Ballona Creek watershed will assist in reducing pollution of the watershed. Implementation of Mitigation Measure Hydro-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Hydro-3. Potential Wetlands Impacts**

Although not likely, some areas of KHSRA could be designated as waters of the United States subject to jurisdiction under Section 404 of the Clean Water Act (CWA). Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities that may necessitate the placement of fill in these areas. Implementation of Mitigation Measure Hydro-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

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<sup>5</sup> Development can increase pollutant loads in runoff from construction activities, landscape irrigation, storm water, and illicit dumping. Pollutants of concern include sediment, nutrients, bacteria and viruses, oxygen demanding substances, oil and grease, metals, pesticides, and trash. Public parks contribute substantial amounts of trash and pollutants associated with parking lots. Paved surfaces, parking lots, and gutter designs promote the collection and concentration of pollutants.

## ***GEOLOGY, SOILS AND SEISMICITY***

### **Threshold**

A significant geology, soils and/or seismicity impact would be expected to occur if the project would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i) Rupture of known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (Refer to Division of Mines and Geology (CDMG) Special Publication 42);
  - ii) Strong seismic ground shaking;
  - iii) Seismic-related ground failure, including liquefaction; or
  - iv) Landslides.
- Result in substantial soil erosion or the loss of topsoil.
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property.
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

### **Impacts**

#### **Impact Geo-1. Potential Seismic Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and improvements to existing facilities that would be subjected to strong ground shaking in the event of a nearby earthquake, which would expose people or structures to adverse effects, including the risk of loss, injury or death as a result of seismic ground failure, liquefaction, earthquake induced settlement, or landslides.

The project area is susceptible to impacts from seismic activity. As described in the section entitled “Existing Conditions,” numerous active faults are known to exist in the region that could potentially generate seismic events capable of significantly affecting proposed facilities. Potential affects from surface rupture and severe ground shaking could cause catastrophic damage to KHSRA improvements. Seismically induced landslides could create hazardous conditions in KHSRA. Water features that could be added to the park could fail during strong ground shaking creating flood hazards in down stream locations.

Numerous Alquist-Priolo Fault Zones are located in both east and west portions of KHSRA. These areas would be susceptible to surface rupture. In addition, the California Geological Survey has prepared seismic hazard maps of the region identifying areas with high potential for liquefaction and landslides. Much of the park lies within landslide hazard areas. No liquefaction hazard areas are noted in these maps within the project footprint.

Implementation of Mitigation Measure Geo-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Geo-2. Potential Ground Subsidence Impacts**

The oil field adjacent to KHSRA is subject to subsidence related to oil extraction activities, as described in the section entitled “Existing Conditions.” Subsidence could damage existing and potential future structures, cause surface cracking, and damage underground utilities that could be implemented as a result of the General Plan Amendment.

The area has a long history of oil extraction dating back to 1924. Most of the production wells were drilled in the area currently under production, outside of the proposed project footprint. However, some abandoned wells exist on the park. The oil field area has exhibited subsidence of up to two meters in some areas since oil production began. To date, areas of subsidence have been limited to within the oil field boundaries.

KHSRA is mostly out of the historic oil extraction area. Therefore, the likelihood that subsidence could occur is remote. However, pavement, retaining walls, buildings, and underground utilities servicing the park area could be susceptible to damage from subsidence at the edges of the park bordering the oil field. Implementation of Mitigation Measure Geo-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Geo-3. Potential Erosion Impacts**

Much of the park area is comprised of steep hillsides naturally susceptible to erosive forces. Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and increased public use. Over-use by park visitors, decreased vegetation, over-watering, and poorly engineered grades would increase

erosion potential. In addition, development of the site would require removal of vegetative cover and grading in some areas of the park. During grading activities, bare soil would be subject to erosion from rain and wind.

The reduction of overall permeable area could also increase erosion potential by leading to greater water runoff rates and concentrated flows that have greater potential to erode exposed soils. The effects of excessive erosion range from nuisance problems that require additional maintenance, such as increased siltation in storm drains, to extreme cases where water courses are down cut and gullies develop, which can eventually undermine adjacent structures or vegetation. Implementation of Mitigation Measure Geo-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

#### **Impact Geo-4. Potential Unsuitable Soils Impacts**

Some soils on KHSRA lands, including natural soils and artificial fill could be unsuitable for building that could occur under implementation of the General Plan Amendment. In addition, abandoned oil wells could decrease soil stability beneath areas of KHSRA adjacent to the oilfield. Expansive soils could exist at KHSRA, creating shrink-swell hazards to building foundations. Non-engineered fill material could fail beneath improvements creating a potential landslide hazard. Residential tracts in the northern and western part of the Baldwin Hills have suffered damage from slope failures triggered by heavy rains in the past. However, many of these tracts were constructed in the late 1940s and early 1950s before local governments enacted strict grading codes. Many of these tracts have graded slopes with steep slopes (1:1) and often without proper drainage. Implementation of Mitigation Measure Geo-4, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

#### **Impact Geo-5. Potential Soils Impacts Related to Septic Systems**

The park is in the area served by the Hyperion Treatment Plant (HTP), located directly southwest of the Los Angeles International Airport. The park does not include septic tanks or alternative waste disposal systems. Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and increased public use that may generate additional wastewater. This may necessitate new connections to the existing sewer system. However, if any future development within the park did require installation of septic systems to accommodate wastewater generated on site in areas not

connected to the County sewer system, soil stability impacts could occur. Implementation of Mitigation Measure Geo-5, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***BIOLOGICAL RESOURCES***

### **Threshold**

The Department has not formally adopted significance standards for biological resources impacts, but it generally considers that implementation of the General Plan Amendment would have a significant effect on biological resources if it were to:

- Have a substantial adverse effect on any species identified as threatened, endangered, candidate, or sensitive (rare), as discussed in CEQA Guidelines Section 15380;
- Have a substantial adverse effect on the habitat of endangered, threatened, or rare species, or other sensitive natural community identified in local or regional plans, policies, regulations, or on lists compiled by CDFG or USFWS;
- Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marshes and riparian areas) as defined by Section 404 of the Clean Water Act, or riparian and marsh areas under the jurisdiction of CDFG, as defined by Fish and Game Codes 1601-1603; or
- Substantially interfere with movement of any native resident or migratory fish or wildlife species, or with established fish or wildlife migratory or dispersal corridors.

### **Impacts**

#### **Impact Bio-1. Potential Effects to Native Habitats and Species**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and improvements to existing facilities that could affect native habitats and species. Localized, minor, short-term, temporary effects on native vegetation could occur from construction (e.g., potential visitor center and/or day-visitor parking facility, other new facilities). Effects would be related to heavy equipment and construction activities and could include soil compaction, dust, vegetation removal, wildlife harassment or mortality, root damage, erosion, and introduction and spread of non-native species. The addition of silt, the resuspension of sediment, or the introduction of construction-related pollutants (fuels, lubricants, cement) could degrade the quality of native vegetation or wetlands.

Although site-specific short- and long-term negative affects to native habitats and species could occur as the result of future actions that could be implemented under the proposed zoning, the

overall design of The Plan would also provide increased protection for native habitats. The park would be zoned to protect natural resources while providing a diverse visitor experience. Although portions of the park would remain developed or could be further developed, the proposed zoning overall would preclude several types of new development (e.g., campgrounds or overnight visitor lodging) that have the potential to adversely affect native vegetation. In addition, possible future actions (e.g., construction of new facilities) that could occur under the proposed zoning, would be subject to the consistent set of goals and guidelines which would guide how the action could be implemented. The application of zoning in combination with the consistent set of goals and guidelines would have a short- and long-term, negligible, beneficial effect on native habitats.

Implementation of Mitigation Measure Bio-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Bio-2. Potential Effects on Special Status Species**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and improvements to existing facilities that could affect special status species species<sup>6</sup>. Although no special status species are currently reported from the park, suitable habitat for several protected species does occur within KHSRA, for example, coastal cactus wren, nesting raptors, or species of bats. Localized, minor,

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<sup>6</sup> For the purposes of this document, special-status species are defined by the following sources:

- the California Native Plant Protection Act (Fish and Game Code § 1900 *et seq.*) protects endangered and “rare” species, subspecies, and varieties or plants;
- the California Endangered Species Act lists plants and wildlife as threatened or endangered (Fish and Game Code § 2070);
- the Federal Endangered Species Act, the Secretary of Commerce, and the Secretary of the Interior list plants and wildlife as threatened or endangered (16 USC. § 1533[a]; 16 USC § 1533 [a] [2]; 16 USC § 1533 [c] [1]);
- CEQA Guidelines, Section 15380, includes plants and wildlife that may be considered rare or endangered if the species meets certain specified criteria;
- the California Native Plant Society (CNPS) lists plants as rare, threatened, or endangered;
- the California Department of Fish and Game designates plants and wildlife as “species of special concern” and prohibits the destruction of nests and eggs of any bird (Section 3503);
- the Migratory Bird Treaty Act (16 USC, Sec. 703, Supp. I, 1989) prohibits killing, possessing, or trading of migratory non-game birds;
- the California Fish and Game Code (Sections 3511 [birds], 5050 [reptiles and amphibians], and 4700 [mammals]) designates listed wildlife as fully protected in California;
- the federal Bald Eagle Protection Act (16 USC § 668 *et seq.*) prohibits persons within the United States (or places subject to U.S. jurisdiction) from “possessing, selling, purchasing, offering to sell, transporting, exporting or importing any bald eagle or golden eagle, alive or dead, or any part, nest, or egg thereof;
- “Special Animals” is a general term that refers to all taxa the CDFG Natural Diversity Data Base (NDDDB) tracks, regardless of their legal or protection status. The term does not offer further protection beyond the legal or protection status that may apply; and
- the California Fish and Game Code (Section 4800) designates the mountain lion (genus *Felis*) as a specially protected mammal. It is unlawful to take, injure, possess, transport, import, or sell mountain lion or any part or product thereof, except as specially provided.

short-term, to long-term effects to special status species could occur from construction of potential facilities. Effects would be related to heavy equipment and construction activities and could include direct removal of habitat, harassment or mortality, and introduction and spread of non-native species. Implementation of Mitigation Measure Bio-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Bio-3. Potential Increase in Public Access and Use**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities and improvements to existing facilities that could increase public access and use of the park. With increased activity associated with public use of the park, invasive species would likely be transported by visitors onto park land at a greater rate than occurs at present. Seeds of invasive species are likely to be dispersed by such vectors as the boots of hikers and the tires of bicycles and cars. Invasive plant species may cause:

- A decline in distribution and density of native wildlife habitat;
- A decrease in native plant diversity; and,
- A direct modification of the environment, such as transformation from a sensitive plant community to a non-native habitat.

The establishment of a viable population of invasive, non-native species in ecologically sensitive areas may also lead to alterations in the community composition, diversity, and richness of wildlife and plants. The potential for increased density and distribution of invasive species is proportionate to the increase in the number of visitors to the park and would constitute a significant impact.

Potentially significant loss of vegetation and wildlife due to increased recreational activities may be caused by:

- Excessive noise, trampling, or rapid movements by joggers and bicyclists resulting in harassment to wildlife;
- Increased garbage, road-kills, and trash that attract corvids, resulting in nest predation; (3) loss of species diversity; and,
- Off-trail activity resulting in habitat destruction and/or fragmentation and spread of invasive species.

Implementation of Mitigation Measure Bio-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***CULTURAL RESOURCES***

### **Threshold**

The project may result in a significant impact, if it would:

- Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

### **Impacts**

#### **Impact Cul-1. Potential Archaeological Resources Impacts**

There are eighteen known archaeological sites within a one-quarter mile radius of KHSRA. Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities. Excavation related to the park development may yield archaeological resources, not previously discovered. Implementation of Mitigation Measure Cul-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

#### **Impact Cul-2. Potential Paleontological Resources Impacts**

Geologic formations underlying the project area are considered to be fossiliferous (containing fossils). Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the construction of additional public use and support facilities. Excavation in the project area would likely encounter the Pleistocene and Pliocene

formations, which would almost certainly include significant fossil vertebrate remains. Since many of the significant vertebrate fossils that may be encountered are relatively small, examination of the excavated rock for these finds would be essential. Implementation of Mitigation Measure Cul-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Cul-3. Potential Human Remains Disturbance Impacts**

No historic cemeteries are known to have existed from KHSRA. However, this does not preclude the existence of burials of any kind from being identified on the park during construction or maintenance, should development occur as a result of General Plan Amendment implementation. Implementation of Mitigation Measure Cul-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***AESTHETICS***

### **Threshold**

A project would have a significant effect on aesthetic quality if it were to:

- Have substantially negative aesthetic effects.
- Substantially degrade or obstruct scenic views from public areas.
- Produce substantial light or glare.

### **Impacts**

#### **Impact Aes-1. Potential Aesthetic Quality Impacts (New Facilities)**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in a number of additional facilities at KHSRA, primarily to enhance and support public use of the park. Potential facilities could include visitor centers, a restaurant, trails, parking areas, a nursery, etc. (see the section entitled “The Plan”). Installation of all potential facilities allowed by The Plan would constitute a potentially significant aesthetic change, with the degree of change dependent on project-specific details to be determined at the time projects were proposed. The aesthetic change would be significant if the site selection,

facility scale, or facility design caused substantial degradation of the scenic quality of the park from public areas. Further, if lighting associated with facilities created substantial glare, the impact would be significant. Areas that are most sensitive to scenic quality degradation are those along ridgelines, which are visible from long-distance and near-distance views. For instance, a very minor structure such as a kiosk located in an environmentally non-sensitive area may not result in the same level of impact or require the same level of mitigation as a structure such as a visitor center placed at the Vista Pacifica Scenic Site. Implementation of Mitigation Measure Aes-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

**Impact Aes-2. Potential Aesthetic Quality Impacts (Vegetation Disturbance)**

Prescribed burning is included in the KHSRA General Plan Amendment as a potential activity for controlling invasive plant species. If implemented, this activity could result in disturbance of relatively large portions of vegetation in the park, including creation of devegetated, blackened areas if not managed properly. The aesthetic change associated with such events would be potentially significant. The degree of aesthetic change is dependent on the size and location of the disturbed area, which would be determined prior to implementation of the prescribed burning projects. The aesthetic change would be significant if the disturbed areas are located within the public viewshed and if the disturbed area is not restored. However, it should be noted that without implementation of prescribed burning, non-native plants might spread within the park and reduce native plant habitat.

If implemented as a result of the General Plan Amendment, removal of invasive exotic plant and tree species and use of mechanical vegetation treatments would also result in devegetated areas. To some degree, these activities are mitigating in that the purpose of such activities is to restore native vegetation through replanting. The degree of change would depend on the size and location of the disturbed area, which would be determined prior to implementation of non-native plant removal projects. The aesthetic change would result in significant degradation of scenic views if the activities were large in scale, were conducted in areas visible to the public, and if restoration of the area did not occur.

Implementation of Mitigation Measure Aes-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

**Impact Aes-3. Potential Aesthetic Quality Impacts (Increased Public Use)**

The KHSRA General Plan Amendment would likely result in increased public visitation of the park, if the following were implemented: new trails, increased information regarding public activities available at the park (such as public use area maps and brochures) and new public activity destinations, such as visitors centers and a restaurant. In addition, provision of universal access improvements could result in increased public use of the park. Increased public use would not necessarily result in adverse impacts to aesthetic resources. However, trespassing and improper use of public access areas could lead to litter, disturbed vegetation, and damage to Park facilities and resources, detracting from the aesthetic quality of the park. Litter, disturbed vegetation, and damage to facilities and resources would constitute a significant effect, if the degradation of aesthetic quality were substantial. Implementation of Mitigation Measure Aes-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

***RECREATION*****Threshold**

Recreation impacts would be considered significant if the project would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

**Impacts****Impact Rec-1. Potential Deterioration of Recreation Facilities**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities designed to improve and expand public recreation opportunities at KHSRA. Implementation of the Plan could also result in increases in use of other adjacent public recreation facilities that connect to KHSRA, such as nearby regional trails. Deterioration of park facilities at KHSRA and adjacent facilities could occur if facilities are not sized to accommodate potential use levels, are not operated and maintained or operated properly, or if expected use levels are exceeded. Implementation of Mitigation Measure Rec-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and

development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

**Impact Rec-2. Potential Physical Effects Associated with New Recreation Facilities**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could improve public use and infrastructure facilities at the park, allowing the park to develop reliable, lasting facilities that support recreational use by the public. Potentially significant environmental effects associated with construction and operation of potential KHSRA facilities are identified throughout this impact discussion. Implementation of the mitigation measures included in the below section entitled “Mitigation Measures Proposed to Minimize Significant Effects” would reduce potential impacts to less than significant. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

***TRAFFIC AND CIRCULATION***

**Threshold**

***Traffic Circulation***

Generally, traffic impacts associated with the proposed project would have a significant effect on traffic circulation if it were to:

- Cause an increase in traffic that is substantial in relation to existing traffic load and capacity of the street system and Congestion Management Program facilities (as defined by local government plans and policies).
- Interfere with the existing transportation network, causing substantial alterations to circulation patterns or major traffic hazards.

***Pedestrian and Bicycle Safety***

Generally, impacts to pedestrians and bicyclists related to the project may have a significant effect if it were to:

- Result in a substantial hazard to pedestrians or bicyclists.
- Substantially constrain or discourage access to KHSRA.

***Parking***

Generally, implementation of the proposed project could have a significant effect if it were to:

- Result in a substantially, unmet parking demand that leads to hazardous pedestrian and traffic conditions.

## Impacts

This section discusses the program-level potential for implementation of the proposed KHSRA General Plan Amendment to result in traffic and access impacts and to affect the traffic patterns and the character of other circulation networks in the surrounding area. Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new facilities. As individual project management actions, including the construction of new facilities and development of project specific Management Plans, become more clearly defined, they will be subject to subsequent project-specific environmental review and accompanying traffic impact analyses. The Los Angeles County CMP requires that all projects undergoing an Environmental Impact Report (EIR) conduct a CMP-level traffic impact analysis. At the time individual facilities and Management Plans are developed and analyzed in detail, specific mitigation measures can be determined to reduce the project's impact to transportation and parking to less than significant levels. Adopted significance standards for traffic circulation and pedestrian and bicycle safety for the project-specific analysis would be determined by the appropriate jurisdiction for each roadway and intersection facility (i.e., Cities of Culver City and Los Angeles, Los Angeles County MTA and Caltrans). Parking requirements for project specific land uses may be subject to Zoning Code Parking Requirements of the Los Angeles County MTA, the City of Culver City, the City of Los Angeles, or Caltrans.

The following discusses a broad and programmatic approach to the potential traffic, circulation and parking impacts that project implementation may cause.

### **Impact Trans-1. Potential Traffic Circulation Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in an increase in public use and an associated increase in car trips to the park. The potential forecast generation of increased traffic during the weekday peak commute hours, and the peak weekend hour may significantly impact the local and regional circulation networks in the project vicinity. As noted in Table 2-2, all of the CMP facilities within the project area are currently operating at unsatisfactory levels of service in both peak hours (LOS F). Addition of Park related traffic would exacerbate current and forecast peak hour levels of service at CMP and other local roadways and intersections. In addition, the potential increase in park related traffic may impact other local roadways and their adjacent land uses that would be used to access Park entrance roadways. Implementation of Mitigation Measure Trans-1, listed in the section entitled "Mitigation Measures Proposed to Minimize Significant Effects," would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Trans-2. Potential Pedestrian and Bicycle Safety Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in new secondary access points to the park. The location and design of the potential secondary pedestrian/bicyclist access points to the park may result in safety hazards for both motorists and pedestrians. Implementation of Mitigation Measure Trans-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Trans-3. Potential Parking Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in several new parking areas. However, the potential mix and types of land uses that could occur in the park as a result of General Plan Amendment implementation might generate parking demand beyond the parking supply currently envisioned. This potential for unmet parking demand may lead to hazardous pedestrian and traffic conditions as vehicles circulate in crowded parking lots, or park in unauthorized (i.e., residential) areas outside KHSRA. Implementation of Mitigation Measure Trans-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***PLANS AND POLICIES***

### **Threshold**

Generally, implementation of the General Plan Amendment would have a significant plan or policy impact if it were to:

- Substantially conflict with established regional, state or federal plans, policies, and/or guidelines with jurisdiction over KHSRA, and as a consequence of such conflict, result in a potential adverse physical impact on the environment.

### **Impacts**

#### **Impact Plan-1. Potential Conflict with Established Plans and Policies**

Because of the broad nature of the plans and policies of jurisdictions within and adjacent to KHSRA, some of the management actions of the General Plan Amendment could be perceived to

be in conflict with regional, state, and federal plans and policies, in particular the Land Use Element of the City of Culver City General Plan. The existing portion of KHSRA is designated Open Space by the County of Los Angeles and implementation of the General Plan Amendment would be consistent with this designation. The Vista Pacifica Scenic Site and adjacent County owned lands, located in the City of Culver City, are designated Low Density Multiple Family Residential and Open Space and are zoned HR – Hillside Residential and R1a – One Family Dwelling. Implementation of the General Plan Amendment would be consistent with the Open Space designation and may be permitted within the residential designations, subject to City ordinance. The Land Use Element of the City of Culver City General Plan indicates that certain non-residential uses may also be permitted in a residential designation where controlled by City ordinance. In general, lower intensity land uses, such as open space or recreation uses, may be permitted within a residential designation. However, implementation of the General Plan Amendment could require amendment to the City of Culver City Land Use Map and Zoning Map. The City of Culver City has indicated that they intend to initiate a General Plan Amendment and Zone Amendment that would change the Vista Pacifica site from Hillside Residential to Open Space, recognizing the potential for some residential and commercial uses within the site. However, this amendment has not yet occurred. While inconsistency with adopted land use designation is not considered a physical environmental impact, inconsistent development activities could result in environmental impact. Implementation of Mitigation Measure Plan-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level.

In general, potential conflicts of a proposed project or program on Department lands with the planning laws of other jurisdictions is a policy issue and is considered by the decision-makers independently of the environmental review process as a part of the decision to approve, modify, or disapprove a proposed project or program. The EIR analyzes and provides information on the potential environmental impacts of implementing the General Plan Amendment. The information on planning laws of local jurisdictions could be used by the Department and other decision-makers in assessing the extent to which the General Plan Amendment may conflict with such laws and in making the decision to approve the proposed General Plan Amendment or an alternative. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet know, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***UTILITIES AND PUBLIC SERVICES***

### **Threshold**

Increase in demand for utilities or public services associated with implementation of the General Plan Amendment would not in itself be considered a significant environmental impact. However, if such demand were to result in the expansion of existing facilities or construction of new facilities, and if construction or operation of these expanded or new facilities were to result in a

significant effect on the physical environment, implementation of the General Plan Amendment would be considered to have a significant impact on utilities or public services.

## **Impacts**

Potential impacts associated with the need for and operation of stormwater facilities is discussed under the section entitled “Water Quality and Hydrology.” Potential impacts associated with construction of any new stormwater facilities required as part of Plan implementation are addressed in the discussions related to construction phase impacts.

### **Impact Util-1. Potential Fire Protection Services Impacts**

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and the Fire Department’s judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy and the degree of fire hazard.

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in increased visitation to the park, which, in turn, would increase the probability of fires caused by human activity. The General Plan Amendment includes some management actions for providing additional fire protection. Under The Plan, fire roads and hydrants could be installed where necessary to facilitate fire protection and park hours could be limited to daytime only, except for scheduled events in controlled areas.

Full implementation of The Plan could result in some increases in demand for fire protection services, but overall these increases would be minimal. However, potential fire protection services impacts could occur if new facilities are not designed properly and proper access and water flow is not provided. Implementation of Mitigation Measure Util-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***AIR QUALITY***

### **Threshold**

The following thresholds determine significance with respect to air quality. Air quality impacts would be considered significant if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan.

- Violate any air quality standards or contribute substantially to an existing or projected air quality violation.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentration.
- Create objectionable odors affecting a substantial number of people.

In addition, the SCAQMD has adopted air quality thresholds of significance for construction activities and project operations that are shown in Table 4-2.

**TABLE 4-2  
SCAQMD AIR POLLUTION SIGNIFICANCE CRITERIA**

Air Pollutant	Project Construction	Project Operation
Carbon Monoxide (CO)	550 lbs. Per day	550 lbs. Per day
Reactive Organic Compounds (ROC)	75 lbs. Per day	55 lbs. Per day
Nitrogen Oxides (NO <sub>x</sub> )	100 lbs. Per day	55 lbs. Per day
Particulates (PM <sub>10</sub> )	150 lbs. Per day	150 lbs. Per day

Source: South Coast Air Quality Management District, 1993

## Impacts

### **Impact Air-1. Potential Construction-Related Emissions Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in construction projects for the provision of additional public use opportunities and related facilities. Facilities that could be constructed under the General Plan Amendment include new visitor centers, a restaurant, new trails, information kiosks, a native plant nursery, a wildlife rescue center, a sculpture garden, and expanded maintenance facilities.

Construction or demolition activities associated with potential General Plan Amendment projects could generate substantial amounts of dust (including PM<sub>10</sub> and particles with diameters of

2.5 microns or less [PM<sub>2.5</sub>]) primarily from “fugitive<sup>7</sup>” sources and lesser amounts of other criteria air pollutants, primarily from operation of heavy equipment. A large portion of the potential construction dust emissions would result from equipment and motor-vehicle traffic over paved and unpaved roads and the use of temporary, unpaved parking lots at construction sites. Potential dust emissions from construction would vary from day to day, depending on the level and type of construction activity, the silt content of the soil, and the prevailing weather.

Exhaust from potential construction equipment, haul trucks, and construction-worker commute trips, would also result in increased PM<sub>10</sub> levels, along with other criteria air pollutants such as CO, NO<sub>x</sub>, and ROC. Potential asphalt paving and application of architectural materials would also result in evaporative emissions. Criteria pollutant emissions of ROC and NO<sub>x</sub> from these emissions sources would incrementally add to regional atmospheric loading of ozone precursors during construction of projects that could be implemented under the General Plan Amendment.

In the absence of mitigation, potential construction or demolition activities could result in significant quantities of dust and air emissions, and, as a result, local visibility and PM<sub>10</sub>/PM<sub>2.5</sub>, and criteria air pollutant concentrations could be adversely affected. Without mitigation, air quality impacts by construction or demolition activities could have a significant but temporary effect in the immediate vicinity of individual sites. Implementation of Mitigation Measure Air-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Air-2. Potential Operational Emissions Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in an increase in public use and an associated increase in car trips to the park. Increased motor vehicle emissions would be the largest sources of pollutants resulting from implementation of the projects that could be implemented under the General Plan Amendment. Traffic levels would increase due to increases in visitation to the park and jobs related to the administration, operations, and maintenance of the park. No stationary on-site emissions are envisioned as a result of the General Plan Amendment. Some stationary emissions resulting from electrical energy demand projected for the park would occur off-site at electrical power generating plants located throughout the utility’s generating network. The total stationary emissions are relatively small compared to total potential motor vehicle emissions.

Facilities or projects in the Basin with daily operation-related emissions that exceed the SCAQMD’s thresholds, presented in Table 4-2 constitute significant air quality impacts. Motor

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<sup>7</sup> “Fugitive” emissions generally refer to those emissions that are released to the atmosphere by some means other than through a stack or tailpipe. Fugitive dust emissions typically include emissions from onsite surface disturbance activities and offsite vehicular travel on unpaved roadways.

vehicle emission estimates can be used to account for most of the potential total daily operation-related emissions of the park associated with implementation of the General Plan Amendment. Modeling can provide estimates of motor vehicle emissions based on average trip length and the number of new trips generated. While the potential increase in trip generation resulting from implementation of the General Plan Amendment is not known at this time, modeling provides an idea of the relative traffic levels that would exceed the established emissions thresholds. For instance, a model based on the CARB EMFAC-2000 emissions model published in 2000, shows that 900 vehicle trips of average trip distance of 25 miles (one way) would result in emissions levels that are below the thresholds.

The General Plan Amendment includes program-level specifications that would mollify air emissions. Foremost, the General Plan Amendment emphasizes non-vehicular public access to the park via connections to pedestrian and bicycle trails and to public transit. Potential transit stops at park entrances and within the park would be located in conjunction with heavy use areas and private vehicles would not have access throughout the park. The General Plan Amendment also aims to cluster visitor facilities and active recreation areas to maximize public access and connections to public transportation. For instance, locating the trailheads that serve the trail system at the two visitor centers could reduce intra-park vehicle trips. Moreover, the General Plan Amendment aims to implement energy-efficient practices in the design and operation of proposed facilities, including use of solar and other non-fuel dependent energy sources.

If implementation of the General Plan Amendment does not result in a daily traffic volume higher than 900 vehicle trips of average length 25 miles, then the air quality impact would likely be less than significant; however, projected traffic volumes are not known at this time. Implementation of Mitigation Measure Air-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Air-3. Potential Emissions Impacts from Prescribed Burning**

The General Plan Amendment indicates that, where necessary, controlled burns may be used on a limited basis to eradicate and control non-native plant species and to encourage native plant regeneration. Prescribed burning causes smoke production and emits PM<sub>10</sub>, PM<sub>2.5</sub>, Volatile Organic Compounds (VOC), CO, NO<sub>x</sub> and Carbon Dioxide (CO<sub>2</sub>). Air quality effects of potential prescribed fires should be managed by working with county and state air resources personnel and using the latest technology to monitor and manage the amount of smoke reaching visitors, residents, and employees. In addition, all potential prescribed burning would be required to comply with SCAQMD Rule 444, which regulates open burning (SCAQMD, 2001). Implementation of Mitigation Measure Air-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of

specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***NOISE***

### **Threshold**

A project would normally result in a significant noise impact if it would:

- Expose persons to or generate noise levels in excess of standards established in the local General Plan Amendment or noise ordinance, or applicable standards of other agencies.
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels;
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.
- For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise.

### **Impacts**

#### **Impact Noise-1. Potential Construction Noise Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in construction projects related to the provision of additional public use opportunities and facilities, and additional support facilities. Facilities that could be constructed under the General Plan Amendment include new visitor centers, a restaurant, new trails, information kiosks, a native plant nursery, an animal rescue center, a sculpture garden, administrative buildings and maintenance facilities. Construction or demolition activities associated with potential General Plan Amendment projects could generate substantial amounts of noise within proximity of individual construction sites.

The location and schedule of construction projects that could occur under the General Plan Amendment are unknown at this time, but could occur at locations that would adversely affect the experience of Park users and/or the noise environment of off-site sensitive land uses. Recreational land uses are sensitive to noise and excessive noise detracts from the recreational experience (in duration or intensity). Other sensitive noise receptors include the residences and other regional parks immediately adjacent to KHSRA.

Construction of the potential projects would result in temporary, intermittent increases in ambient noise levels. Construction noise levels at the project area would fluctuate depending on the particular type, number, and duration of use of various construction equipment. The effect of construction noise would depend on the volume generated and the distance between construction activities and noise-sensitive receptors. Noise levels of typical commercial construction equipment are shown in Table 4-3 below.

The local noise ordinances provide specific thresholds of significance for noise resulting from construction activities. For instance, section 112.05(a) of the City of Los Angeles Municipal Code requires that noise resulting from the operation of construction equipment within 500 feet of any residential zone of the City not exceed 75 dBA at a distance of 50 feet. Noise from construction equipment in the park, and haul trucks accessing the park could result in noise levels that exceed the threshold when operated without noise controls and in areas near residences. Without noise controls and other mitigation measures, noise impacts by construction or demolition activities could have a significant temporary impact. Implementation of Mitigation Measure Noise-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Noise-2. Potential Operational Noise Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in additional noise sources, associated with the operation of the potential new Park facilities and activities. The Plan envisions KHSRA as a major destination point and anticipates an increase in the number of visitors to the park, if Plan components were implemented. The amount of vehicular traffic to the park is expected to grow, resulting in additional noise among roadways leading to and from the projects, but the amount of the increase is unknown.

While implementation of the General Plan Amendment could result in additional noise sources, The Plan includes several components that would limit the level of additional noise associated with Plan development. The General Plan Amendment aims to limit the amount of vehicular traffic both to and within the park by emphasizing non-vehicular public access to the park via connections to pedestrian and bicycle trails and to public transit. Potential transit stops at park entrances and within the park would be located in conjunction with heavy use areas.

Moreover, private vehicles would not have access throughout the park, limiting areas that could be affected by vehicular noise. Locating the trailheads that serve the trail system at the two visitor centers would help to contain vehicular traffic and reduce intra-park vehicle trips. The General Plan Amendment intends to group together active recreation areas and facilities to maximize public access and connections to public transportation.

**TABLE 4-3  
TYPICAL COMMERCIAL CONSTRUCTION NOISE LEVELS**

<b>Equipment</b>	<b>DBA at 50 feet<sup>a</sup> WITHOUT CONTROLS</b>	<b>dBA at 50 feet<sup>a</sup> WITH CONTROLS<sup>b</sup></b>
Backhoe	85	75
Bulldozer	80	75
Graders	85	75
Frontend loader	79	75
Dumptrucks	91	75
Concrete Pump	82	75
Flat bed delivery truck	91	75
Crane	83	75
Pumps	76	75

<sup>a</sup> Estimates correspond to a distance of 50 feet from the noisiest piece of equipment and 200 feet from the other equipment associated with that phase.

<sup>b</sup> Implementing controls may include selecting quieter procedures or machines and implementing noise-control features requiring no major redesign or extreme costs (e.g., improved mufflers, equipment redesign, use of silencers, shields, shrouds, and ducts, and engine enclosures).

Source: U.S. Environmental Protection Agency, 1971

Potential visitor activities such as recreation and educational field trips could also contribute noise to the environment. The General Plan Amendment specifies the need to include adequate setbacks from adjacent neighborhoods and the use of earth forms, existing topography, and restored ecological areas without recreational access to separate park activities from adjacent residents. For instance, The Plan considers planting additional native species to serve as a buffer between the proposed sculpture garden and the adjacent neighborhood. If necessary, fences or other barriers could be utilized to restrict public access. Use of sport facilities can also be managed by controlling night lighting and scheduling of events. Buffer areas would also reduce noise levels heard at nearby residential areas from noise caused maintenance equipment such as mowers and landscaping equipment.

The park is not located within an airport land use plan or within the vicinity of a private airstrip such that it would expose visitors or employees of the park to noise levels greater than 65 dBA (City of Los Angeles, 1999).

While components of the General Plan Amendment may reduce potential noise sources, potential impacts could be associated with Plan implementation, depending on the size and location of potential facilities and uses. Implementation of Mitigation Measure Noise-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time

they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

## ***HAZARDS AND HAZARDOUS MATERIALS***

### **Threshold**

A project would normally result in a significant hazards and hazardous materials impact if it would:

- Involve a substantial risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation).
- Contain sites that are included on the *Hazardous Waste and Substances Sites List* and, as a result, create a significant hazard to the public or the environment.
- Expose people to existing sources of potential hazards, including hazardous materials.
- Create a public health hazard or potential public health hazard.
- Potentially interfere with an emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas.

### **Impacts**

#### **Impact Haz-1. Potential Construction Phase Hazardous Sites Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of a number of new facilities in the park, thereby generating construction projects. Construction of potential facilities would require the excavation and disturbance of soils that may be contaminated. Historic land uses in some areas may have resulted in the contamination of soil and/or groundwater (ASTM, 1997). These land uses include those that supported USTs or vehicle use, and any such areas could contain leaked petroleum hydrocarbons. In addition, contamination may be associated with adjacent and previous oilfield activities. In addition, maintenance operations employing pesticides or pesticide loading/staging areas may have contaminated soil. Areas of contamination associated with past land uses could be encountered during construction activities. Dewatering of contaminated groundwater from any trenches and other excavations could expose individuals and the environment to hazardous levels of contaminants. Similarly, body contact with contaminated soil or groundwater could lead to inadvertent exposure to contaminated materials. Furthermore, dust composed of contaminated soil particles could be inhaled. The impact of potential exposure to hazardous materials is considered potentially significant.

Exposure to hazardous materials or wastes could cause various short-term or long-term health effects. Possible health effects could be acute (immediate, or of short-term severity), chronic

(long-term, recurring, or resulting from repeated exposure), or both. Acute effects, often resulting from a single exposure, could result in a range of effects from minor to major, such as nausea, vomiting, headache, dizziness, or burns. Chronic exposure could result in systemic damage or damage to organs, such as the lungs, liver, or kidneys. Health effects would be specific to each hazardous substance. For specific hazardous substances, potential health effects of exposure are described in detail in standard references (Budavari, 1989; Sax and Lewis, 1989; Sittig, 1985).

Implementation of Mitigation Measure Haz-1, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Haz-2. Potential Construction Phase Hazardous Materials Release Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in the addition of new or expansion of existing facilities. Potential construction activities would require the use of certain potentially hazardous materials such as fuels, oils, bentonite, and solvents. These materials would generally be used for excavation equipment, generators, and other construction equipment and would be contained within vessels engineered for safe storage. Spills during onsite fueling of equipment or upset conditions (i.e., puncture of a fuel tank through operator error or slope instability) could result in a release of fuels or oils into the environment, including drainages adjacent to the park. Storage of large quantities of these materials at the construction sites is not anticipated. However, potential release of these materials would be a potentially significant impact. Implementation of Mitigation Measure Haz-2, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### **Impact Haz-3. Potential Construction Phase Fire Hazard Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in new or expanded park facilities. Sparks from potential construction activities, such as welding and cutting could ignite dry brush and wood structures. If such a fire occurred and spread to adjacent areas, damage to Department property and wildlife habitat, and public health and safety risk could occur. Implementation of Mitigation Measure Haz-3, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time

they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

#### **Impact Haz-4. Potential Operation-Related Hazard Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could result in an increase in public use and an associated increase in traffic within the park, although The Plan emphasizes non-vehicular public access to the park and program-level design specifications to reduce reliance on motor vehicles. An increase in traffic would result primarily from visitation to the park and jobs related to the administration, operations, and maintenance of the park. The increase in motor vehicle traffic could result in runoff from oil, grease and fuel products as well as accidental releases of hazardous materials. The General Plan Amendment also prescribes the use of controlled burns to eradicate and control non-native plant species. If such a fire spread to unplanned areas, damage to Department property and wildlife habitat, and public health and safety risk could occur. Implementation of Mitigation Measure Haz-4, listed in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects,” would reduce the potential impact to less than significant at the program level. Because implementation information, such as locations of specific facilities and development of project-specific Management Plans, is not yet known, specific facilities and Plans would be reviewed at the time they are proposed for implementation to determine the potential for project-specific impacts and to identify appropriate mitigation measures.

### UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

Implementation of the KHSRA General Plan Amendment would not result in unavoidable significant environmental effects.

### SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Implementation of the proposed General Plan Amendment would apply management zoning to the park which would allow construction of new facilities that in turn could result in short-term, construction-related impacts, impacts from increased operations and maintenance activities, and impacts associated with increased public access and use. These potential impacts are identified in the section above entitled “Significant Environmental Effects.” If the mitigation measures identified in the section below entitled “Mitigation Measures Proposed to Minimize Significant Effects” were approved and implemented, implementation of the General Plan Amendment would not result in significant irreversible environmental impacts or commitment of resources. However, the commitment of land, resources, and energy for maintenance of the project facilities would be a long-term commitment. Once the project has been developed, it is unlikely that circumstances would arise that could justify the return of the land occupied by the General Plan Amendment facilities to its original condition.

## GROWTH-INDUCING IMPACTS

Section 15126.2 (d) of the CEQA Guidelines requires agencies to address potential growth-inducing effects of their actions. Growth-inducing effects are defined as those effects that could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing effects could result from projects that would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The Guidelines also require analysis of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The primary purpose of the KHSRA General Plan Amendment is to portray the desired resource conditions of the park and desired visitor experience, and to provide goals and guidelines that will direct future management efforts toward achieving those desires. An important component of this purpose is to protect the natural resources of the park. This purpose and the goals, policies, and management zones of The Plan have no potential to foster population growth either directly or indirectly, or the construction of additional housing with the exception of the potential addition of Department housing at the Vista Pacifica site. The Plan's potential to foster to economic growth through revenue generating facilities is minimal and would not result in growth-inducing effects.

## MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS

To ensure that implementation of the General Plan Amendment protects resources and visitor experience, a consistent set of mitigation measures would be applied to actions that result from or are guided by The Plan. The Department would prepare appropriate environmental review (i.e., CEQA, the National Historic Preservation Act, and other relevant legislation) for these future actions. As part of the environmental review, the Department would avoid, minimize, and mitigate adverse impacts when practicable.

## *SUSTAINABLE DESIGN AND AESTHETICS*

Projects should avoid or minimize adverse impacts to natural and cultural resources. Development projects (e.g., buildings, facilities, utilities, roads, bridges, trails, etc.) or reconstruction projects (e.g., road reconstruction, building rehabilitation, utility upgrade, etc.) should be designed to work in harmony with the surroundings. Projects should reduce, minimize, or eliminate air and water nonpoint-source pollution. Projects should be sustainable whenever practicable, by recycling and reusing materials, by minimizing materials, by minimizing energy consumption during the project, and by minimizing energy consumption throughout the lifespan of the project.

## ***LAND USE***

No potentially significant or significant impacts have been identified, and no mitigation is required.

## ***WATER QUALITY AND HYDROLOGY***

**Mitigation Measure Hydro-1.** Potential runoff and downstream flooding impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Park improvements shall include upgrading of storm water drainage facilities to accommodate increased runoff volumes where necessary. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce velocity. System designs shall be designed to eliminate increases in peak flow rates from current levels.
- A drainage plan shall be included with grading plan applications. Drainage systems shall be designed to maximize the use of detention basins, vegetated areas, and velocity dissipaters to reduce peak flows where possible.

Implementation of storm drainage measures, as described above, would reduce the program level potential runoff and downstream flooding impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than Significant at the Program-level

**Mitigation Measure Hydro-2.** Potential water quality impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- New facilities shall include water quality control features such as detention basins and vegetated buffers, to prevent pollution of adjacent water resources by runoff. Wherever feasible, detention basins shall be equipped with oil and grease traps and will be cleaned regularly.
- Parking lots shall be equipped with runoff treatment systems in compliance with Standard Urban Storm Water Mitigation Plan regulations.
- Storm water drainage systems shall be equipped to collect the anticipated increases in trash loads. The systems shall assist in reducing the park's trash contribution to Ballona Creek from existing levels.

- Operational best management practices for street cleaning, litter control, and catch basin cleaning shall be routinely implemented to prevent water quality degradation.
- Storm Water Pollution Prevention Plans shall be submitted to the SWRCB prior to the commencement of construction activities. Plan requirements, including on-site soil and dust control Best Management Practices shall be implemented to minimize construction site erosion. Best Management Practices shall be established and implemented in compliance with the Los Angeles County Storm Water Ordinance.
- A Pesticide Management Plan shall be established to regulate the storage and application of pesticides to protect water quality.

Implementation of the features, systems, and practices described above would reduce the potential program-level water quality impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Hydro-3.** Potential wetlands impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Prior to development, a survey shall be conducted to determine whether there are potential waters of the United States that would be affected by project implementation. If waters of the United States are identified, site and design facilities/actions to avoid adverse effects to wetlands. If avoidance is infeasible, minimize and compensate adverse effects to wetlands in accordance with 404 of the CWA and other applicable wetland protection regulations.
- Develop and implement restoration and/or monitoring plans as warranted. Plans should include methods for implementation, performance standards, monitoring criteria, and adaptive management techniques.

Implementation of compliance measure, as described above, would reduce the potential program-level wetlands impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

## ***GEOLOGY SOILS AND SEISMICITY***

**Mitigation Measure Geo-1.** Potential seismic impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Geotechnical investigations shall be performed before final designs of any project facilities. The studies shall assess seismic hazards and soil suitability. Recommendations provided in these investigations shall be implemented.
- Project facilities shall be constructed in accordance with Uniform Building Code earthquake design standards.
- Project facilities located within Alquist-Priolo Fault Zones shall be designed in accordance with Special Publication 117 and the Uniform Building Code.
- Permanent structures shall be located outside of Alquist-Priolo Earthquake Zones and landslide hazard areas identified in the Seismic Hazards Maps when possible.

Implementation of design measures, as described above, would reduce the potential program-level seismic impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Geo-2.** Potential ground subsidence impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Where possible, the project shall avoid placing buildings and underground utilities adjacent to the oil field.

Implementation of the design measure described above would reduce the potential program-level ground subsidence impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Geo-3.** Potential erosion impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Final Grading Plans shall be designed to minimize soil erosion potential and shall be approved by the County of Los Angeles Department of Public Works or other appropriate agency.
- Steep slopes shall be vegetated to reduce erosion potential.
- The park layout shall be designed to discourage walking or biking on unimproved, steep slopes.
- Conceptual Drainage Plans shall be prepared to accompany grading permit applications.
- A landscaping and irrigation plan shall be developed to minimize erosion potential.

Implementation of design measures and plans, as described above, would reduce the potential program-level erosion impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Geo-4.** Potential unsuitable soils impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Geotechnical investigations shall be performed before final designs of any project facilities. The studies shall assess seismic hazards, slope stability, and soil suitability. Recommendations provided in these investigations shall be implemented.
- A registered engineering geologist shall approve all grading and filling operations.
- A survey shall be conducted for new and abandoned wells to ensure the stability of nearby soils.

Implementation of investigations and design measures, as described above, would reduce the potential program-level unsuitable soils impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Geo-5.** Potential soils impacts related to septic systems should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- If septic systems are needed, they shall be designed to comply with Los Angeles County and RWQCB design requirements.

Implementation of the design measure described above would reduce the potential program-level soil impacts related to septic systems associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

### ***BIOLOGICAL RESOURCES***

**Mitigation Measure Bio-1.** Potential effects to native habitats and species should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Conduct vegetation and wildlife surveys as warranted.
- Site and design facilities/actions to avoid adverse effects to sensitive vegetative communities and wildlife habitats. If avoidance is infeasible, minimize and compensate adverse effects as appropriate.
- Implement a compliance-monitoring program in order to stay within the parameters of CEQA and other pertinent regulations. The compliance-monitoring program would oversee these mitigation measures and would include reporting protocols.
- Implement a natural resource protection program. Standard measures could include construction scheduling, biological monitoring, erosion and sediment control, use of fencing or other means to protect sensitive resources adjacent to construction, topsoil salvage, and revegetation. This could include specific construction monitoring by resource specialists as well as treatment and reporting procedures.
- Implement a noxious weed abatement program. Standard measures could include the following elements: ensure construction-related equipment arrives on-site free of mud or seed-bearing material, certify all seeds and straw material as weed-free, identify areas of noxious weeds pre-construction, treat noxious weeds or noxious weed topsoil prior to construction (e.g., topsoil segregation, storage, herbicide treatment), and revegetate with appropriate native species.
- Develop revegetation plans for the disturbed area and require the use of native species. Revegetation plans should specify seed/plant source, seed/plant mixes, soil preparation, etc. Salvage vegetation should be used to the extent possible.

In addition, as indicated in Mitigation Measure Aes-1, night lighting shall be minimized, and when necessary, lighting shall be shielded and directed downward.

Implementation of the design measure described above would reduce the potential program-level effects to native habitats associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Bio-2.** Potential impacts to special status species should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Implement Bio-1, above.
- Conduct surveys for rare, threatened, and endangered species as warranted.
- Site and design facilities/actions to avoid adverse effects to rare, threatened, and endangered species. If avoidance is infeasible, minimize and compensate adverse effects to rare, threatened, and endangered species as appropriate and in consultation with the appropriate resource agencies.
- Develop and implement restoration and/or monitoring plans as warranted. Plans should include methods for implementation, performance standards, monitoring criteria, and adaptive management techniques.
- Implement measures to reduce adverse effects of non-native plants and wildlife on rare, threatened, and endangered species.

Implementation of the design measure described above would reduce the potential program-level special status species impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Bio-3.** Potential biological resources impacts related to increased public access and use should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Prepare and implement a park-specific adaptive management program to address recreational carrying capacity.
- Educate the public concerning non-native species and the effects they have on native vegetation and wildlife.

- Educate the public on the dangers of intentional or unintentional feeding of park wildlife, and on inadvertent harassment through observation or pursuit.

Implementation of the design measure described above would reduce the potential program-level biological resources impacts related to increased public access and use associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

### ***CULTURAL RESOURCES***

**Mitigation Measure Cul-1.** Potential archaeological resources impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Subject projects to site-specific planning and compliance in accordance with cultural resource protection laws.
- Site and design facilities/actions to avoid adverse effects to sensitive cultural resources. Subject projects to site-specific planning and compliance in accordance with cultural resource regulations. Conduct archeological site monitoring and routine protection. Conduct data recovery excavations at archeological sites threatened with destruction, where protection or site avoidance during design and construction is infeasible.
- Avoid or mitigate impacts to ethnographic resources. Mitigation could include identification of and assistance in accessing alternative resource gathering areas, continuing to provide access to traditional use and spiritual areas, and screening new development from traditional use areas.
- Continue and formalize ongoing consultations with culturally associated American Indian people. Formalize a parkwide gathering plan and discovery plan for American Indian human remains. Protect known burial sites, and protect sensitive traditional use areas to the extent feasible.
- Conduct surveys for archeological sites, traditional resources, historic sites, structures, and cultural landscape resources as warranted. Surveys and reports shall be prepared in compliance with the recommendations of the Native American Heritage Commission.
- The Department shall provide a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeologist shall be on site during any activity when new soils are to be moved or exported. The archaeologist shall be authorized to halt the project in the area

of the finding and mark, collect, and evaluate any archaeological materials discovered during construction. Copies of any archaeological surveys, studies, or reports of field observation during grading and land modification shall be prepared and certified by the attendant archaeologist and submitted to the California State University at Fullerton (CSUF) Archaeological Information Center. Any artifacts recovered during mitigation shall be deposited in an accredited and permanent scientific or educational institution for the benefit of current and future generations.

- In the event cultural resources are encountered on the park during the course of construction; the findings shall be examined by a qualified archaeologist. If the finding is determined to be an historical or unique archaeological resource, avoidance measures or appropriate mitigation shall be implemented. Recommendations can then be made for any appropriate procedures to either further investigate or mitigate impacts to those cultural resources that have been encountered. As provided in the CEQA Guidelines, Section 15064.5(f), work could continue on other parts of the park while historical or unique archaeological resource mitigation (if necessary) takes place.

Implementation of the requirements described above would reduce the potential program-level archaeological resources impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Cul-2.** Potential paleontological resources impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- The Department shall provide a qualified paleontological monitor to monitor all subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The monitor shall be on site during any activity when new soils are to be moved or exported. The monitor shall be authorized to halt the project in the area of the finding until such specimens may be marked, collected, and evaluated for all paleontological materials discovered during construction. Copies of paleontological surveys, studies, or reports of field observation during grading and land modification shall be prepared and certified by the attendant paleontological monitor and submitted to the Natural History Museum of Los Angeles County. Any fossils recovered during mitigation shall be deposited by an accredited and permanent scientific or educational institution such as the Department, for the benefit of current and future generations.

Implementation of the requirement described above would reduce the potential program-level paleontological resources impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific

facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Cul-3.** Potential human remains disturbance impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- In the event human remains are encountered; the Los Angeles County Coroner shall be contacted to determine whether or not investigation of the cause of death is required. In the event the remains are of Native American origin, the Native American Heritage Commission shall be contacted to determine necessary procedures for protection and preservation remains, including reburial, as provided in the CEQA Guidelines, Section 15064.5(e).

Implementation of the requirement described above would reduce the potential program-level human remains disturbance impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

## ***AESTHETICS***

**Mitigation Measure Aes-1.** Potential aesthetic quality impacts associated with the addition of new facilities should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Implement design practices that reduce the overall aesthetic effect of new roads and trails, including, but not limited to:
  - Road and trail design guidelines that require use of best management practices for road location and alignment, such as locating and designing roads and trails to follow natural topography; minimizing stream crossings; avoiding large cut-and-fill road designs; and minimizing excavation.
  - Design and site new roads and trails to minimize grading and the visibility of cut banks and fill slopes.
  - Overpasses, safety, and directional signs, and other road and highway structures may protrude above a skyline only when it can be demonstrated that: the facility is necessary

- for public service and safety, the break in the skyline is only seen in the foreground, and the break in the skyline is a minimum necessary to provide the required service.
- Screen and restore disturbed areas with an appropriate mix of native vegetation species.
  - Implement design practices that reduce the overall aesthetic effect of new facilities including, but not limited to:
    - Include screening vegetation where appropriate.
    - Where grading is necessary, contour slopes and landforms to mimic the surrounding environment as much as possible.
    - Incorporate architectural siting/design elements that are compatible with the applicable surroundings.
    - Eliminate, wherever possible, the use of unpainted metallic surfaces and other sources that may cause increased levels of reflectivity.
    - Minimize night lighting where practicable. Where night lighting is necessary, direct downward and site and shield new exterior lighting such that it is not highly visible or obtrusive.
    - Maintain the silhouette of new structures below the skyline of bluffs, cliffs, or ridges.
    - Design any new structural additions to historic structures to harmonize with older structural features and comply with scenic easements and aesthetic guidelines.
    - Encourage the salvage and selective reuse of building features if historic structures are demolished.
    - Conduct project-level visual simulations for any facility to be located on prominent ridgelines.
    - Screen and restore disturbed areas with an appropriate mix of native vegetation species.

Implementation of design guidelines and vegetation protection and restoration activities, as described above, would reduce the potential program-level aesthetic quality impact associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Aes-2.** Potential aesthetic quality impacts associated with vegetation disturbance should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Require development of a native species planting program prior to implementing prescribed burning or non-native plant removal activities.
- Require that prescribed burns be conducted under conditions that would not harm plant species that reproduce through seed only.
- Restore and screen disturbed areas as soon as feasible following removal or prescribed burn activities.
- Minimize the total area and duration of soil exposure.

Implementation of these vegetation protection and restoration actions would reduce the potential program-level aesthetic impact related to vegetation disturbance associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Aes-3.** Potential aesthetic quality impacts associated with increased public use should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Advocate responsible use of the park and enforcement of the rules and regulations established for use of the park by increasing public education and awareness of Park resource sensitivity and would publish rules and regulations for Park visitors. This information shall be provided in all areas subject to public use, including the kiosks, entrance stations, visitor centers, etc. This information should also be available through adjacent jurisdictions and public use facilities, such as those operated by Los Angeles County, the City of Culver City, and the City of Los Angeles.
- Implement an inspection and maintenance program for facilities used by the public and inspection of perimeter fencing, access gates, and locks in order to minimize trespassing and illegal dumping.
- Establish coordinated enforcement of public use of the park with adjacent jurisdictions, including Los Angeles County, the City of Culver City, and the City of Los Angeles.

- Include appropriate staffing to monitor public use of the park and enforcement of Park rules and regulations.

Implementation of the above measures would reduce the potential program-level aesthetic impacts related to increased public use associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

### ***RECREATION***

**Mitigation Measure Rec-1.** Potential deterioration of recreation facilities should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Work with and reach an agreement with adjacent jurisdictions (Los Angeles County, City of Culver City, City of Los Angeles) to ensure that connecting trails and adjacent neighborhood parks are adequately sized and maintained to support any additional use that may result from implementation of the General Plan Amendment.
- Project level design of KHSRA facilities shall include appropriate sizing and capacity for planned use.
- Project level design of KHSRA facilities shall include associated maintenance requirements.

Implementation of the measures described above would reduce the potential program-level recreation facility deterioration impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Rec-2.** In order to address potential adverse physical effect on the environment associated with the construction and operation of proposed recreation facilities to less than significant, the mitigation measures included in this section entitled “Mitigation Measures Proposed to Minimize Significant Effects” would be implemented.

Significance After Mitigation: Less than significant.

## ***TRAFFIC AND CIRCULATION***

**Mitigation Measure Trans-1.** Potential traffic circulation impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Upon development of project level facilities and Management Plans, conduct a traffic impact analysis for the park's components consistent with the requirements of the Los Angeles County Congestion Management Program (CMP). Components of the CMP-level traffic impact analysis would include, but not be limited to the following: 1) project trip generation analysis; 2) roadway, intersection and freeway mainline operations and level of service analyses; 3) provision of mitigation measures to reduce potential project traffic impacts; and 4) an on-site circulation and access analysis. The traffic impact analysis shall be circulated to and reviewed by all potential impacted agencies including: the cities of Culver City and Los Angeles; the Los Angeles County MTA; and Caltrans. Following completion and approval of the traffic impact analysis, implement any required mitigation or requirements.

Implementation of CMP requirements, as described above, would reduce the potential program-level traffic circulation impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Trans-2.** Potential pedestrian and bicycle safety impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Upon development of project level facilities and Management Plans, an access and on-site circulation analysis shall be conducted to determine the adequacy of pedestrian and vehicular access locations and facilities. This analysis shall be prepared in accordance to design guidelines established by the affected city jurisdictions, the County of Los Angeles and Caltrans. Components of the access and on-site circulation analysis would include, but not be limited to the following: 1) vehicular queuing at main access locations; 2) roadway design (horizontal and vertical sight distance, roadway width and grade, etc.); and 3) consistency of pedestrian facilities with local and State design guidelines (e.g., Caltrans Highway Design Manual, and local Zoning Ordinances). The access and on-site circulation analysis shall be circulated to and reviewed by all potential impacted agencies including: the cities of Culver City and Los Angeles; the Los Angeles County MTA; and Caltrans. Following completion and approval of the on-site circulation analysis, implement any required mitigation or requirements.

Implementation of the requirement described above would reduce the potential program-level pedestrian and bicycle safety impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Trans-3.** Potential parking impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Upon development of project level facilities and Management Plans, a parking demand analysis shall be conducted to determine the adequacy of on-site parking supply. This analysis shall be prepared in accordance to Zoning Code Parking Requirements established by the affected city jurisdictions and the County of Los Angeles. The parking demand analysis shall be circulated to and reviewed by all potential impacted agencies including the cities of Culver City and Los Angeles and Los Angeles County. Following completion and approval of the parking demand analysis, implement any required mitigation or requirements.

Implementation of the requirement described above would reduce the potential program-level parking impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

### ***PLANS AND POLICIES***

**Mitigation Measure Plan-1.** Potential plans and policies impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Development should be consistent with the existing land use and zoning designation of the applicable jurisdiction. If required, request a land use plan and/or zoning amendment from applicable jurisdictions, including the City of Culver City, for newly acquired parcels.

Implementation of the measure described above would reduce the potential program-level plans and policies impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for

implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

## ***UTILITIES AND PUBLIC SERVICES***

### **Mitigation Measures for Fire Protection Services**

**Mitigation Measure Util-1.** Potential fire protection services impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Individual actions shall comply with all applicable State and local codes and ordinances. Requirements may relate to automatic fire extinguishing systems and smoke detectors.
- Roofs of new structures shall have a Class A rating to mitigate problems that may arise as a result of grassland-urban interface.
- Requirements for emergency vehicle access shall be incorporated into project design, including access to physical structures and fire hydrants. Such requirements include road grade and lane width, paving of access roads, curb painting, emergency breakaway gates, vertical clearance, turning radii, turn-around areas, and signage.
- Water flow requirements and fire hydrant specifications shall be met. All fire hydrants shall be in place prior to construction of any facilities.
- Emergency vehicle access shall be maintained at all times during construction phases.
- Access for Fire Department apparatus and personnel to and into all structures shall be required.

Implementation of the requirements described above would reduce the potential program-level fire protection services impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

## ***AIR QUALITY***

**Mitigation Measure Air-1.** Potential construction-related emissions impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA

General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Phase construction projects in such a manner that minimizes the area of surface disturbance (e.g., grading, and excavation), the number of vehicle trips on unpaved surfaces, and concurrent use of diesel equipment and other equipment or activities that release emissions. Minimizing these effects may entail clustering certain construction activities or performing them in a particular order.
- Implement a compliance-monitoring program in order to stay within the parameters of project-specific compliance documents. The compliance-monitoring program would oversee these mitigation measures and would include reporting protocols.
- Abide by SCAQMD Rule 403 (Fugitive Dust Abatement). Standard dust abatement measures could include the following elements: water or otherwise stabilize soils, cover haul trucks, employ speed limits on unpaved roads, minimize vegetation clearing, and revegetate disturbed areas post-construction.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.
- Ensure that any stationary motor sources (such as generators and compressors) located within 100 feet of any residence or public facilities (sensitive receptors) is equipped with a supplementary exhaust pollution control system as required by the California Air Resources Board.
- Take appropriate measures to control pedestrian access to active construction areas. Recreational users should be kept a minimal distance from the operation of all construction equipment, except trucks hauling materials to and from the park.

All of these measures may not apply at each construction site. Generally, larger, more intensive construction or demolition projects require more comprehensive dust abatement programs and mitigation practices than smaller, less intensive projects.

Implementation of the practices described above would reduce the potential program-level construction-related emissions impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Air-2.** Potential operational emissions impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Pave all roads that will be used by motor vehicles to limit fugitive dust (PM<sub>10</sub>) emissions.
- Work with local public transit agencies to offer schedules that meet park use demand and allowing bikes and other recreational equipment on their routes to and from the park.
- Design park roads in a manner that reduces vehicle queuing and provides easy bus turnarounds to limit proximate CO emissions.
- Provide reserved and preferentially located carpool/vanpool parking spaces.
- Employ site plan design and building design mitigation measures that have been developed by the SCAQMD. This may include building orientation to the north for natural cooling, the use of energy efficient appliances and lights, increased insulation and window treatments, light-colored roof materials to reflect heat, shade trees to reduce building's heat, use of building materials that do not require use of paints/solvents, centralized water heating systems.

Implementation of the measures described above would reduce the potential program-level operational emissions impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Air-3.** Potential emissions impacts from prescribed burning should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Any prescribed open burning shall comply with SCAQMD Rule 444.

Implementation of the requirement described above would reduce the potential program-level emissions impacts from prescribed burning associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

***NOISE***

**Mitigation Measure Noise-1.** Potential construction noise impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- Implement a compliance-monitoring program in order to stay within the parameters of project-specific compliance documents. The compliance-monitoring program would oversee these mitigation measures and would include reporting protocols. The compliance-monitoring program may entail posting signs at construction sites that include permitted construction days and hours, and a day and evening contact number for the job site. For some projects it may also be necessary to appoint an enforcement manager to respond to and track noise complaints. Further, a pre-construction meeting may be needed in which the job inspectors and the general contractor/on-site project manager confirm noise mitigation measures.
- Impact tools used for project construction shall be hydraulically or electrically powered wherever possible. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to 10 dBA. External jackets on the tools themselves shall be used where feasible, which could achieve a reduction of 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.
- Noise control measures shall be applied to construction equipment. Equipment and trucks used for project construction shall utilize normal noise control techniques (e.g., mufflers in good working order).
- Construction equipment shall not be operated during sensitive times of the day. Seasonal time constraints may also need to be implemented.
- Plan construction activities so that additive noise is minimized (e.g., avoid concurrent use of loud construction equipment) and that minimizes the duration in which a sensitive receptor is affected by noise.
- Take appropriate measures to control pedestrian access to active construction areas. Recreational users should be kept at a safe distance from the operation of construction equipment.
- Limit the proximity of construction noise to sensitive receptors. Stationary noise sources, such as diesel generators, shall be located as far from sensitive receptors as possible. Haul-trucks and other construction equipment shall be restricted to routes that practicably avoid sensitive receptors.

Implementation of requirements described above would reduce the potential program-level construction noise impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for

implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Noise-2.** Potential operational noise impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- The effects of noise resulting from the use or operation of new facilities should be analyzed to ensure consistency with relevant local noise ordinances. The design of new facilities shall incorporate specifications that prevent noise impacts on nearby residences.
- Operation of maintenance equipment such as mowers should abide by the local noise ordinances.
- Speed limits should be placed on roads accessing the park to reduce noise levels caused by motor vehicle traffic.
- Scheduling of recreational events and educational field trip visits should be consistent with relevant local noise ordinances.

Implementation of the requirements described above would reduce the potential program-level operational noise impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

## ***HAZARDS AND HAZARDOUS MATERIALS***

**Mitigation Measure Haz-1.** Potential construction phase hazardous site impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- The Department shall incorporate into construction contract specifications the requirement that in the event that known or previously unidentified hazardous substances are encountered during construction, the contractor has a contingency plan for sampling and analysis of potentially hazardous substances, and coordination with the appropriate regulatory agencies. Any site investigations or remediations shall be performed in accordance with applicable laws.

Also implement Mitigation Measure Air-1 to abide by SCAQMD Rule 403 (Fugitive Dust Abatement). Implementation of this measure would control fugitive dust and reduce the potential for inhalation of any contaminated dust during soil disturbing activities.

Implementation of the measure described above would reduce the potential program-level construction phase hazardous sites impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measures Haz-2.** Potential construction phase hazardous materials release impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- The Department shall prepare a Spill Prevention, Control, and Countermeasure Plan that requires all transport, storage, and handling of construction-related hazardous materials in a manner consistent with relevant regulations and guidelines, including those recommended and enforced by the California Department of Transportation, RWQCB, and Los Angeles County. Recommendations may include, but are not limited to:
  - Transporting, storing, and handling materials in appropriate and approved containers, using the applicable federal, state, and/or local regulatory agency protocols
  - Maintaining required clearances
  - Storing all reserve fuel supplies only within the confines of a designated construction staging area or designated Park maintenance facilities
  - Installing barriers or fencing around drilling pits to entrap all boring fluids
  - Locating a vacuum truck on-site periodically remove drilling fluids
  - Refueling equipment only within designated contained areas within the designated construction staging area or designated Park maintenance facilities
  - Regularly inspecting all construction vehicles and directional drilling equipment for leaks
- The General Plan Amendment shall also require that the park and all contractors immediately control the source of any leak. The Plan shall be enforced through contractual obligations and through daily construction site monitoring. The Spill Prevention, Control, and Countermeasure Plan shall include measures to be taken in the event of an accidental spill. In the event of any spill or release of any chemical in any physical form that occurs on or

immediately adjacent to the job site during construction, the contractor shall be required to immediately contain any spill utilizing appropriate spill containment and countermeasures and to immediately notify the park Supervisor and operations staff.

- The Department shall incorporate into construction contract specifications the requirement that construction staging areas be designed to contain runoff so that contaminants such as oil, grease, and fuel products do not drain towards receiving waters and soils. Heavy-duty construction equipment should not be stored overnight adjacent to a potential receiving water or high-use recreation area; however, if necessary, drip pans shall be placed beneath the machinery engine block and hydraulic systems.

Implementation of the measures described above would reduce the potential program-level construction phase hazardous materials release impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Haz-3.** Potential construction phase fire hazard impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- The Department shall incorporate into construction contract specifications the following requirements:
  - All dry brush shall be removed from the project construction area, and immediate vicinity
  - All equipment shall be provided with spark arresters, except those exempted by regulation
  - During periods of high fire danger, as determined by local firefighting agencies, the contractor shall provide a water truck on-site
  - In the event that project construction ignites a fire, the contractor shall notify local fire-fighting agencies immediately

Implementation of requirements described above would reduce the potential program-level construction phase fire hazard impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

**Mitigation Measure Haz-4.** Potential operation-related hazard impacts should be reviewed at the project-level for specific facilities or Management Plans proposed under the KHSRA General Plan Amendment and mitigation measures shall be considered, including but not limited to:

- The Department shall incorporate into facility design specifications the requirement that parking areas be designed to contain runoff so that contaminants such as oil, grease, and fuel products do not drain towards receiving soils, waters, and high-use areas of the park.

In addition, prescribed open burning shall comply with SCAQMD Rule 444 as required Mitigation Measure Air-3.

Implementation of the measures described above would reduce the potential program-level operation-related hazard impacts associated with the implementation of the KHSRA General Plan Amendment. However, the Department would require examination of many specific facilities and Management Plans included in the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

Significance After Mitigation: Less than significant at the Program-level

## ALTERNATIVES TO THE PROPOSED ACTION

### **OVERVIEW**

This section identifies alternatives to the proposed General Plan Amendment and discusses environmental impacts associated with each alternative. The California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a) require EIRs to describe a range of reasonable alternatives to a project or its location that would attain the basic objectives of the project, but would avoid or reduce significant effects of the project, and to evaluate the comparative merits of the alternatives. The Guidelines set forth the following criteria for selecting alternatives:

- . . . [T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (§15126.6[b])
- The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. (§15126.6[c])
- The specific alternative of “no project” shall also be evaluated along with its impact. (§15126.6[e][1])
- The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only

the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. (§15126.6[f])

Three alternatives were considered prior to developing the proposed General Plan Amendment:

- No Project
- Reduced Project Alternative
- “One Big Park” Alternative

## ***NO PROJECT ALTERNATIVE***

### **Description of Alternative**

This Alternative would allow the existing the park to function, but would not achieve any of the goals of this General Plan Amendment or the goals of the Baldwin Hills Master Plan, as directed by legislation. Under the No Project Alternative, the existing General Plan for the park would remain in effect and although the Department would continue to own the Vista Pacifica Scenic Site, this parcel would not become available for public use and no support and facilities would be constructed. The site would remain unfenced and passive recreation, similar to existing conditions, would be expected to continue. The Department would continue to manage and operate existing facilities within the park consistent with the existing General Plan. New facilities consistent with the existing General Plan could be built within the existing park boundary after site-specific planning and compliance documentation is prepared. No new facilities (e.g., visitor center, restaurant, trails, interpretive nodes) would be constructed on the Vista Pacific Scenic Site. This alternative would result in a continued regional deficiency of recreation and open space.

### **Impacts and Reasons for Rejection**

The No Project Alternative would make it difficult for the Department to seek funds for recreational and interpretive improvements that could enhance the visitor experience at the park’s current level of use, and that could be necessary to accommodate projected increases in visitor demand in the future. Land use and management would not become systematized within the park under the No Project Alternative, nor would a systematic approach to acquisition as an aid for solving management problems have been developed and shared with the public.

Implementation of actions and mitigation measures similar to those identified in the proposed General Plan Amendment would likely reduce impacts to a less than significant level. However, implementation of these actions and measures would occur on an individual basis, without the comprehensive management strategies presented in the General Plan Amendment. The No Project Alternative would not address, or would only address in a partial and unsystematic manner, the primary goal of the General Plan Amendment to enhance recreational opportunities and protect resources. Therefore, this alternative was rejected.

## ***REDUCED PROJECT ALTERNATIVE***

### **Description of Alternative**

The Reduced Project Alternative would include amending the General Plan for existing parklands only, excluding the Vista Pacifica Scenic Site. Similar to the No Project Alternative described above, the Department would continue to own the Vista Pacifica Scenic Site but no new facilities (e.g., visitor center, restaurant, trails, interpretive nodes) would be constructed and public access would remain similar to existing conditions. This alternative would result in a continued regional deficiency of recreation and open space and reduce the active recreation area by 20% from that proposed by the General Plan Amendment. In addition, this alternative would forego development of the recreational potential of one of the most valuable public resources in the Los Angeles area, the Vista Pacifica Scenic Site.

The Reduced Project Alternative provides most of the active recreational opportunities in the central valley formed by the west and eastern ridges on the east side of La Cienega Boulevard, reserving the natural areas of the eastern ridgelines and canyons for passive recreational uses (i.e., hiking, natural history observation and education). The primary entrance to the park would continue at La Cienega Boulevard.

### **Impacts and Reasons for Rejection**

The Reduced Project Alternative would make it difficult for the Department to seek funds for recreational and interpretive improvements for use at the Vista Pacifica Scenic Site that could enhance visitor experience and resource protection. The Department would continue to provide basic protection services for the Vista Pacifica Scenic Site to deter unauthorized use of the site.

Implementation of actions and mitigation measures similar to those included in the proposed General Plan Amendment would likely reduce impacts to a less than significant level. This alternative would avoid potential visual quality impacts related to the visitor center/restaurant that could be constructed at the Vista Pacifica Scenic Site; however, as discussed above, these impacts of The Plan can be mitigated to a less-than-significant level with measures proposed as part of the specific project and identified in this EIR. The Reduced Project Alternative would not purely address the primary goal of the General Plan Amendment to enhance recreational opportunities and protect resources. Therefore, this alternative was rejected.

## ***“ONE BIG PARK” ALTERNATIVE***

### **Description of Alternative**

The “One Big Park” Alternative would include lands currently owned by the Department, including the existing park and Vista Pacifica Scenic Site, in addition to large expanses of adjacent publicly and privately owned open-space lands to encompass approximately 1,400 acres. This alternative’s most significant feature is an approximately half-mile wide man-made land bridge over La Cienega Boulevard connecting the east and west sections of the Baldwin Hills. This land bridge would unify the proposed park and restore the historic continuity of the

landscape. This alternative would also reduce the visual and noise impacts of La Cienega Boulevard and would place active recreation near the center of the proposed park. In addition to joining the two sections of the Baldwin Hills otherwise bisected by La Cienega Boulevard, this alternative provides over three times more active recreation area than the proposed General Plan Amendment.

This alternative would seek to protect and restore the natural areas in the western half of the proposed park as well as along the eastern ridgelines and canyons, providing primarily passive recreational opportunities, i.e., hiking trails, natural resource and wildlife observation and education in these areas. The conceptual design of this alternative gives this area more of a wilderness character within the highly urbanized Los Angeles basin. The “One Big Park” Alternative maximizes the opportunities to preserve and restore wildlife and native plant connectivity. In the flatter, central valley area between the two ridgelines more active recreational uses are proposed.

More active recreational uses are proposed within the central valley formed by the west and eastern ridges. In the southeast section of the proposed park design, Fairfax Avenue would be eliminated to provide a contiguous golf course bounded by La Cienega Boulevard, Stocker Street, La Brea Avenue, and Slauson Avenue. This area would utilize the existing baseball diamonds and expand these play fields. It would also include a tennis facility and a banquet facility associated with the golf course clubhouse. Just north of Stocker Street and east of La Cienega Boulevard, large active play fields would be developed. The steep slopes and natural areas to the east and north of the play fields would be reserved for natural habitat protection and for trails and passive recreation.

The primary entrances to the proposed park would be from La Cienega Boulevard to the north and Stocker Street and Slauson Avenue (golf course/tennis facility) to the south. Secondary access points for trailhead parking and for bicycle and pedestrian access would be from Jefferson Boulevard, the intersection of Sophomore Drive and Stocker Street, and the intersection of La Brea Avenue and Stocker Street. The design also includes a possible overhead tramway or funicular access point to the Vista Pacifica Scenic Site in the northwest corner of the park from a major parking area off of Jefferson Boulevard. The design would provide for a comprehensive internal park shuttle system providing access to all park activity areas. Parking would be provided at all entrances and at high-use activity areas. The park's roads would provide access to parking for the park's activity and natural areas and to shuttle stops, but would be limited beyond these points to safety and park maintenance vehicles only. A paved bike path would generally follow the internal park road. Multiple unpaved footpaths would provide access into the natural areas from a variety of locations and form numerous short and long loops. The footpath and bicycle trails would connect to Ballona Creek Trail via a land bridge from the Vista Pacifica Scenic Site and to a Stocker Street trail and Overhill pedestrian trail.

## Impacts and Reasons for Rejection

The Department does not currently have established Memoranda of Understanding or other legal agreements with adjacent public or private land owners that would allow the Department to plan or implement this alternative; its feasibility therefore is at best uncertain. The Department would be unable to seek funds for recreational and interpretive improvements for use on lands outside their control.

Although large areas of currently impacted open space (e.g., areas currently used for oil production) would be restored to natural conditions, this alternative also calls for the development of increased facilities that could have substantial short or long-term impacts to resources (e.g., increased dust and noise impacts during construction, noise from facility use, night lighting, traffic, etc.).

Although the “One Big Park” Alternative would fully address to the primary goal of the General Plan Amendment to enhance recreational opportunities and protect resources, it is infeasible at this time. Therefore, this alternative was rejected.

## CUMULATIVE IMPACTS

Cumulative environmental effects are multiple individual effects that, when considered together are considerable or that compound or increase other environmental impacts. The individual effects may result from a single project or a number of separate projects and may occur at the same place and point in time or at different locations and over extended periods of time.

Cumulative impacts can result from individually minor but collectively significant projects. The purpose of this cumulative analysis is to determine whether potentially significant cumulative environmental impacts would occur from implementation of the KHSRA General Plan Amendment in combination with other projects or conditions, and to indicate the severity of the impacts and their likelihood of occurrence. The CEQA Guidelines require that EIRs discuss the cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable,” meaning that the project’s incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. The discussion of cumulative impacts should include:

- (1) Either: (A), a list of past, present, and probable future projects producing related or cumulative impacts; or (B), a summary of projections contained in an adopted General Plan or similar document, or in an adopted or certified environmental document, which described or evaluated conditions contributing to a cumulative impact;
- (2) A discussion of the geographic scope of the area affected by the cumulative effect;
- (3) A summary of expected environmental effects to be produced by these projects; and
- (4) Reasonable, feasible options for mitigating or avoiding the project’s contribution to any significant cumulative effects.

The proposed General Plan Amendment would apply management zoning to the park that could result in new or expanded facilities. The project-level implementation schedule for envisioned facilities at KHSRA is not known at this time; therefore, a definitive list of specific cumulative projects at KHSRA cannot be prepared. Generally, cumulative projects would include development and construction projects within adjacent unincorporated Los Angeles County, the City of Culver City and the City of Los Angeles. Cumulative projects within unincorporated Los Angeles County could include future land uses on the adjacent oilfields following the completion of oil extraction activities. Cumulative projects within the cities of Culver City and Los Angeles could include on-going infill of residential, commercial, and industrial properties, as well as continuing development of recreation and public areas in the vicinity of, and within, KHSRA. In addition, regional development could be considered cumulatively with implementation of the KHSRA General Plan Amendment, where such development relates to regional traffic and transportation, air quality, and habitat conservation; such effects could be cumulatively considerable.

Because specific plans timelines for implementation of facilities that could be developed under the KHSRA General Plan Amendment are not known and many of the projects within the adjacent jurisdictions are not fully developed or designed, assessing the expected environmental effects that these projects would produce entails speculation. However, there are two general categories of effects that could be expected. The first and most widespread would be general construction impacts, such as temporary air quality degradation and increased erosion resulting from earth movement. However, construction impacts would be temporary and local in nature and thus unlikely to constitute cumulatively considerable contributions to cumulative significant impacts. The second category of impacts is related to operational effects to regional traffic, air quality, and potential habitat alterations and effects on wildlife.

Implementation of the KHSRA General Plan Amendment, in conjunction with other regional projects and ongoing regular park maintenance activities, could adversely affect resources within the park. However, implementation of mitigations described in the section entitled “Mitigation Measures Proposed to Minimize Significant Effects” would reduce any impacts, including cumulative impacts, to a less than significant level at the program-level. The Department would require examination of any specific facilities and Management Plans allowed under the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level is necessary, including analysis of potential cumulative effects.

## EFFECTS FOUND NOT TO BE SIGNIFICANT

### *LAND USE*

#### **Disruption of Established Communities**

Implementation of the proposed General Plan Amendment would apply management zoning to the park that could increase public access into portions of the park where public access is

currently allowed, as well as to the Vista Pacifica Scenic Site. The intention of the General Plan Amendment is to provide for the continuation of existing uses on public trails, and access sites, and to provide for the establishment of some new public use opportunities, such as visitor centers, trails, a restaurant, interpretive programs and panels, etc (see the section entitled “The Plan”). In addition, the General Plan Amendment calls for provision of universal access to recreation facilities and trails, which could increase public use of the park. New trails would be restricted to areas of low vulnerability and risk in order to protect water quality and sensitive ecological resources. The General Plan Amendment would give priority to trails that provide connections to urban areas and trails of other agencies. These trails would allow for general public access.

When evaluated in terms of the significance criteria outlined in the section entitled “Significant Environmental Effects,” potential increases in public use would not disrupt or divide the physical arrangement of established surrounding uses. Areas adjacent to the KHSRA are developed with residential and recreational uses, and oilfields, and the proposed increased recreational uses would be compatible with such uses. Proposed trails would connect with existing trails and would not alter the land use character in the vicinity. Therefore, implementation of the General Plan Amendment would not directly result in any significant land use impacts.

The Department would require examination of any specific plan actions allowed under the General Plan Amendment at the time they are proposed for implementation to determine if further environmental review at a more detailed project-specific and site-specific level were necessary.

### **Conflict with Established Recreational Educational, Religious, or Scientific Uses**

Implementation of the KHSRA General Plan Amendment would not substantially conflict with established recreational, educational, religious, or scientific uses. The General Plan Amendment would continue existing education and interpretation and would increase such opportunities by providing new visitor centers, interpretive panels, a plant nursery, and other educational or scientific opportunities. The Plan would improve recreational opportunities and would not affect any casual use of the park for religious activities.

### **Impacts on the Existing Character of the Vicinity**

Implementation of The Plan is intended to continue use of KHSRA as a public use area, and add public uses to the undeveloped Vista Pacifica Scenic Site. Implementation of The Plan would not affect the existing land use character of the site.

### **Agricultural Resources Impacts**

The proposed Plan would be implemented on Department-owned land and the County-owned Vista Pacifica parcels that are operated for public use or are undeveloped. The potential facilities and improvements included in The Plan are consistent with and would not change the existing land use of the park. Most of Los Angeles County (including KHSRA) is not included in the California Resources Agency Farmland Mapping and Monitoring Program and there are no

agricultural resources located in the project area. The proposed Plan would have no effect on agricultural resources.

### **Mineral Resources Impacts**

While the KHSRA area is generally within the area designated as the Inglewood Oil Field (see the section entitled “Existing Conditions”) and oil production previously occurred in some areas of KHSRA lands, oil production does not currently occur within the park. Implementation of the General Plan Amendment would not affect ongoing oil production in adjacent areas.

## ***WATER QUALITY AND HYDROLOGY***

### **Groundwater Impacts**

Implementation of the proposed General Plan Amendment would apply management zoning to the park that could result in the installation of buildings, parking lots, bike paths, and roadways. If constructed, these facilities would reduce the potential for groundwater recharge at the site. However, the park is located at the peak of the Baldwin Hills where minimal surface recharge occurs naturally. Groundwater is not known to exist above 500 feet below ground surface. Rain falling on the site runs off as surface water almost exclusively. Although increased impervious surfaces could accelerate peak runoff, no impacts to groundwater recharge would be expected. Additionally, groundwater quality in the hills is naturally poor. Since little groundwater recharge is known to occur, the potential for any on-site contamination to reach the groundwater from surface or shallow-subsurface uses is unlikely.

### **100-year Floodplain Impacts**

The park is not located within a designated 100-year flood plain. The nearest designated 100-year flood plain is located southeast of the park, within the active oil fields. Potential development within KHSRA would not be subject to flooding from an upstream watershed. Therefore, structures would not impede flood flows or modify the flood plain.

## ***BIOLOGICAL RESOURCES***

### **Impacts to Common Vegetation and Species**

Implementation of the proposed General Plan Amendment would apply management zoning to the park which could increase development and visitor use. Construction and operations could adversely affect common vegetation communities and plant and wildlife species, for example elimination of small portions of non-native annual grassland, mortality of common wildlife species. These potential affects would be considered adverse, but less-than-significant.

## ***CULTURAL RESOURCES***

### **Historic Resources Impacts**

Three historic structures were identified within a ¼-mile radius of the KHSRA and one historic period archaeological site was identified within the Vista Pacifica Scenic Site. The historic period archaeological site was mitigated during monitoring activities conducted during preliminary development of the site by the previous landowner and the site no longer exists. No further impacts are anticipated to occur on the Vista Pacifica Scenic Site. Potential archaeological impacts, including historic archaeological resources, are addressed in Impact Cul-1, discussed above. Implementation of the General Plan Amendment is not expected to affect any historic structures or result in impacts to historic structures pursuant to CEQA Section 15064.5 are anticipated and no mitigation is required.

## ***UTILITIES AND PUBLIC SERVICES***

Implementation of General Plan Amendment management actions would generally not require expansion or improvement of utilities and public services. Implementation of the proposed General Plan Amendment would apply management zoning to the park that could require expansion or existing utilities, water supply, or sewage systems; however, the system expansions required for individual actions are expected to be minimal, and construction and operation of expansions would not likely result in significant effects on the physical environment, beyond those discussed for implementation of the General Plan Amendment as a whole (see the Sections entitled “Significant Environmental Effects” and “Mitigation Measures Proposed to Minimize Significant Effects”). Overall, the General Plan Amendment is beneficial to public service and utility systems, as it will result in efficiency improvements to these systems.

### **Wastewater Treatment Services**

A small increase in demand for wastewater treatment may occur due to increased use of the park; however, this increase would not exceed the wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board. In fact, some General Plan Amendment management actions will offset the need for wastewater treatment. Such actions include the construction of compost toilets where practicable and the use of reclaimed water for all irrigation and other non-potable water uses. Thus any increase in water treatment demand would be minimal and would not necessitate the construction of additional wastewater treatment facilities. Therefore, there would be no significant impact to wastewater treatment services.

### **Water Supply**

Demand for water in the park could increase due to increased visitation and use of the park, though the amount of this increase is unknown. The water demand associated with recreational land uses is generally lower than residential land uses. Moreover, the General Plan Amendment includes water conservation elements. For instance, it stipulates that reclaimed water is used for irrigation and non-drinking water uses. This includes use of reclaimed water or storm water captured on-site for all irrigation and other non-potable water uses as possible.

Implementation of the proposed General Plan Amendment would apply management zoning to the park that could result in the addition of new facilities at the Vista Pacifica Scenic Site. Such facilities could require higher elevation structures and fire hydrants with their required pressures and may include a booster station, a new storage reservoir within the park, a new hydropneumatic zone within the park to service the higher elevations, or new main extensions from the Southern California Water Company. However, after implementation of the General Plan Amendment, the park would continue to have sufficient water supplies available from existing resources. Because the increase in water demand related to implementation of the General Plan Amendment would be minimal and the General Plan Amendment incorporates water conservation elements, there would be a less than significant impact on water supply resources.

### **Solid Waste Disposal**

Increased use of the park would generate additional solid waste but the increase is relatively small compared to total landfill capacity serving the region. Landfills serving the local area would easily accommodate the park's solid waste disposal needs. Moreover, the General Plan Amendment complies with federal, state, and local statutes and regulations related to solid waste. As part of its mandate to maximize the long-term sustainability of park resources, the General Plan Amendment includes recycling of green waste and recycling of other recyclable products. The Plan indicates that all park facilities, gardens, landscaped areas, picnic areas, parking lots, buildings and other visitor-serving uses should be equipped with recycling and trash bins. Therefore, the General Plan Amendment would not result in significant solid waste disposal facilities impacts.

### **Police Protection Services**

The General Plan Amendment states that public safety services shall be coordinated to provide cooperation between park police, state park rangers and all jurisdictions serving the park and includes management actions for providing additional protection and safety services that meet the demands of increased use and activity in the park. Other management actions could include the construction of call boxes, lighting to facilitate night patrols of high-use areas and designing a gating and signage system on park service roads that enables easy and rapid access to the park by public safety personnel. Private vehicles would not have road access throughout the park, preventing many types of safety issues. Fencing of the park perimeter and use of vegetation designed to prevent public access both at the perimeter and in other key areas could be used where necessary. Park hours would be limited to daytime only, except for scheduled events in controlled areas.

Because the General Plan Amendment accounts for addresses the need for additional public safety facilities and service, there would be no significant impact on police services.

### **Schools**

Implementation of the General Plan Amendment would not induce population growth, or the direct need for additional schools in the nearby school districts. Therefore, there would be no

significant impact on public schools systems. Further, The Plan includes several educational opportunities that could provide beneficial resources to local schools.

## ***HAZARDS AND HAZARDOUS MATERIALS***

### **Increase in Public Access and Use**

Implementation of the proposed General Plan Amendment would apply management zoning to the park that could result in increased public use of the park. Greater human presence and accessibility to remote areas of the park could increase the likelihood of illegal dumping of wastes, including hazardous wastes. However, this potential generally exists in all wildlands and open space preserves and would not be considered a substantial threat to the public or the park. Therefore, potential increases in illegal dumping of wastes would not be a significant impact. Moreover, the addition of a full-time park ranger force would reduce the potential for illegal dumping.

### **Pesticide Use**

Continued use of pesticides and fertilizers are anticipated as part of the regular park maintenance. The overall amount of pesticides and fertilizers used and stored at KHSRA could increase somewhat from existing levels, but would not be considered a significant impact.

## **ORGANIZATIONS AND PERSONS CONSULTED**

Organizations and persons consulted appear in Appendices A through D.

## **COMMENTS RECEIVED**

### **ORGANIZATIONS AND PERSONS COMMENTING**

#### ***DRAFT GENERAL PLAN AMENDMENT AND EIR (SEPTEMBER 2001)***

The following agencies and individuals submitted comments on the Draft General Plan Amendment and EIR issued for public review in September 2001:

- Baldwin Stocker, LLC, M.L. Spanier (November 5, 2001)
- Ballona Creek Renaissance, Jim Lamm, President (November 21, 2001)
- City of Culver City, E. Wolkowitz, Mayor (October 29, 2001)
- City of Culver City, M. Thompson, Acting Chief Administrative Officer (November 13, 2001)
- City of Culver City, M. Thompson, Acting Chief Administrative Officer (November 14, 2001)
- City of Culver City, M. Thompson, Acting Chief Administrative Officer (November 21, 2001)
- City of Culver City, M. Thompson, Acting Chief Administrative Officer (February 4, 2002)
- Mary Ann Greene (December 6, 2001)
- Donald P. Lovingfoss (November 17, 2001)

- Jackie McCain (November 23, 2001)
- Native American Heritage Commission, R. Wood, Associate Governmental Program Analyst (July 31, 2001)
- Star Education, K. Bozzi, Executive Director (June 22, 2001)
- State of California, Department of Conservation, R.K. Baker, District Deputy (December 11, 2001)
- State of California, Department of Fish and Game, D.R. Chadwick, Environmental Specialist Supervisor (August 20, 2001)
- State of California, Department of Parks and Recreation, Acquisition and Development – Accessibility Section, L Smith Canar, Accessibility Program Manager (November 20, 2001)
- State of California, Department of Transportation, S. Buswell, IGR/CEQA Program Manager (November 13, 2001)
- Stocker Resources, Inc., H. Hewitt, Hewitt & O’Neil LLP (November 21, 2001)

***RECIRCULATED DRAFT GENERAL PLAN AMENDMENT AND EIR (JUNE 2002)***

A list of organizations and persons commenting on the Recirculated Draft General Plan Amendment and EIR will be provided following the completion of the public review period for this document.

**RESPONSES TO COMMENTS**

***DRAFT GENERAL PLAN AMENDMENT AND EIR (SEPTEMBER 2001)***

**Baldwin Stocker, LLC, M.L. Spanier (November 5, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Ballona Creek Renaissance, Jim Lamm, President (November 21, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**City of Culver City, E. Wolkowitz, Mayor (October 29, 2001)**

The commentors request for an extension of the public comment period was not formally granted, however, as indicated by the list of commentors, City of Culver City comments have been received and are being considered in this document. In addition, recirculation of the Draft General Plan Amendment and EIR would provide the City of Culver City additional opportunity to provide input on the proposed action.

**City of Culver City, M. Thompson, Acting Chief Administrative Officer (November 13, 2001)**

The commentors request for an extension of the public comment period was not formally granted, however, as indicated by the list of commentors, City of Culver City comments have been received and are being considered in this document. In addition, recirculation of the Draft General Plan Amendment and EIR would provide the City of Culver City additional opportunity to provide input on the proposed action. Comments made regarding the environmental analysis have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**City of Culver City, M. Thompson, Acting Chief Administrative Officer (November 14, 2001)**

Comments made regarding the environmental analysis have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**City of Culver City, M. Thompson, Acting Chief Administrative Officer (November 21, 2001)**

Comments made regarding the environmental analysis have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**City of Culver City, M. Thompson, Acting Chief Administrative Officer (February 4, 2002)**

Comments made regarding the environmental analysis have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Mary Ann Greene (December 6, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Donald P. Lovingfoss (November 17, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Jackie McCain (November 23, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Native American Heritage Commission, R. Wood, Associate Governmental Program Analyst (July 31, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Star Education, K. Bozzi, Executive Director (June 22, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**State of California, Department of Conservation, R.K. Baker, District Deputy (December 11, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**State of California, Department of Fish and Game, D.R. Chadwick, Environmental Specialist Supervisor (August 20, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**State of California, Department of Parks and Recreation, Acquisition and Development – Accessibility Section, L Smith Canar, Accessibility Program Manager (November 20, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**State of California, Department of Transportation, S. Buswell, IGR/CEQA Program Manager (November 13, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

**Stocker Resources, Inc., H. Hewitt, Hewitt & O’Neil LLP (November 21, 2001)**

These comments have been fully considered by the recirculated Draft General Plan Amendment and EIR.

***RECIRCULATED DRAFT GENERAL PLAN AMENDMENT AND EIR (JUNE 2002)***

Responses to comments received regarding the Recirculated Draft General Plan Amendment will be provided following completion of the public review period for this document.