



PRESERVING LAND AND RESTORING HABITAT FOR THE EDUCATION AND ENJOYMENT OF ALL

October 28, 2016

Mr. William Jones, Environmental Supervisor II
City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015

Subject: Notice of Preparation for the Paseo Del Mar Permanent Restoration Project
Initial Study

Dear Mr. Jones,

The Palos Verdes Peninsula Land Conservancy (Conservancy) appreciates the opportunity to comment on the Notice of Preparation (NOP) for the Paseo Del Mar Permanent Restoration Project (Project). The Conservancy is responding to the NOP as the signatory to the Operating Agreement for the White Point Nature Preserve with the City of Los Angeles Department of Recreation and Parks. The Conservancy has reviewed the Initial Study for the Paseo Del Mar Permanent Restoration Project. The Initial Study includes a brief description of four alternatives.

The Conservancy's comments are recommendations based on the potential biological, cultural and recreational impacts from the proposed project. The Conservancy has the following comments/concerns:

Scope of EIR

An EIR is required to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. As an EIR need not consider every conceivable alternative to a project, we request that Alternative 4 be removed from the scope of the EIR. This request is due to these foreseeable impacts and general community incompatibilities, as well as the fact that Alternative 4 triggers the most potentially significant impacts as presented in the Initial Study.

Biological Resources and Impacts

Alternative 4, which bisects the White Point Nature Preserve, will have significant impacts to the biological resources. The White Point Nature Preserve contains rare and sensitive

occupied habitat. Native coastal sage scrub habitat on the site currently shelters the threatened California gnatcatcher (*Polioptila californica*) and there are known nesting territories in the project impact area of Alternative 4, as observed in 2015 and 2016 by SWCA Environmental Consultants biologists hired by the City for monitoring of nesting activity. Please see the map below of nest location (yellow pin) and observed foraging activity (shown in green). Alternative 4 would bisect known gnatcatcher territories, disconnecting nesting and foraging habitat and creating risk of vehicle collisions with wildlife.



The estimated area of habitat impacted by Alternative 4 would be larger than the estimated footprint of the right-of-way as described in the Initial Study when considering grading, possible storm drain and utility construction, staging areas, lighting, noise, introduction of invasive weeds and more. These impacts would further degrade critical gnatcatcher territory.

In addition, the Preserve's native habitat was restored with state funding through the Wildlife Conservation Board with the intention of long term- perpetual conservation of the area. As a signatory to the grant agreement for this funding, the City of Los Angeles would be required to refund monies granted if impacts to the site occur.

Cultural Resources

The findings in the Final Environmental Impact Report (Jones & Stokes 2001) for White Point Park Nature Preserve have determined that there are significant historical and archeological resources at White Point Nature Preserve. Alternative 4 would have an impact to resources that were listed on the California Register of Historic Resources by the California State Historical Commission on August 11, 2000.

Consistency with plans and policies

CEQA requires Initial Studies to address consistency of the proposed project with plans and policies. The Initial Study has not addressed the consistency of all plans and policies. The *Master Plan for the White Point Nature Preserve* was adopted by the City of Los Angeles Department of Recreation and Parks in 2001. Alternative 4 of the Initial Study is inconsistent with the Goals for the Preserve which are to:

1. Provide safe and accessible natural parkland for broad regional use and enjoyment.
2. To create passive recreational and educational opportunities that will inspire visitor appreciation of the scenic value and ecological, cultural and historical significance of the preserve.
3. Enhance the ecological value of the preserve through the restoration of native habitat and plant communities

The *San Pedro Community Plan* states that “The White Point Reservation [...] must be used for park and recreation purposes only” and that “the Community Plan views this area as appropriate for a regional park.” Alternative 4, the construction of a road through the Preserve, would be in direct discord with the *San Pedro Community Plan*. In addition, the recreational opportunities that the trail system provides in the White Point Nature Preserve will be impacted by Alternative 4, resulting in a net reduction in recreational facilities. Specifically the ADA-compliant trail that occurs in the area of Alternative 4 would be lost or require rerouting. Further, Goals CF5 and CF5.6 in the *San Pedro Community Plan* call for enhancing existing recreational facilities and preservation and protection of parks and open space from uses that result in a loss of acreage for recreational purposes.

Temporary Impacts

In the EIR, please address all temporary impacts, including but not limited to noise, disturbance, run off, dust, vibration, night-lighting, soil applications/ chemicals, etc.

Cumulative Impacts

The Project is proposed in a densely populated region of southern California. The regional scarcity of biological resources may increase the cumulative significance of Project activities. Cumulative effects analysis should be developed as described under CEQA guidelines Section 15130. For example for consideration, the Palos Verdes population of the California gnatcatcher is an isolated population and White Point Nature Preserve serves as a stepping stone, refuge and as a source population that contributes to the genetic diversity of the Palos Verdes population. In general, please include all potential direct and indirect project related impacts to wildlife corridors or wildlife movement areas, sensitive species and other sensitive habitats, natural lands, open space and adjacent natural habitat in the cumulative effects analysis.

Indirect Permanent Impacts

Alternative 4 has the potential to create long-term and far-reaching impacts above and beyond the direct removal of habitat due to traffic, noise, lighting, erosion, invasive plant species, changes in hydrology, the addition of pollutants, etc. Included in the analysis there should be

assumed at least an effect of 500 feet from impacted habitat areas for indirect impacts to gnatcatchers and other listed species.

Thank you for the opportunity to review the Notice of Preparation. Please forward any subsequent environmental documents regarding the project to my attention at this office.

Sincerely,

A handwritten signature in cursive script that reads "Andrea Vona".

Andrea Vona
Executive Director

CC: Mayor Eric Garcetti
Councilman Joe Buscaino
Mike Shull, General Manager Recreation and Parks
Carl Cooper, Superintendent Recreation and Parks