
APPENDIX A

NOTICE OF PREPARATION (NOP), NOTICE OF COMPLETION (NOC), INITIAL STUDY, AND NOP COMMENT LETTERS

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NOTICE OF PREPARATION

To: State Clearinghouse, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties
From: City of Rancho Palos Verdes
Public Works Department
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391
310-544-5252 or publicworks@rpvca.gov

Subject: Notice of Preparation of an Environmental Impact Report (EIR) pursuant to the Requirements of the California Environmental Quality Act (CEQA) for the Portuguese Bend Landslide Mitigation Project

The City of Rancho Palos Verdes will be the CEQA Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below. We need to know the views of you or your agency as to the scope and content of the environmental information which is germane to you or your agency's statutory responsibilities in connection with the proposed Project.

Project Title: Portuguese Bend Landslide Mitigation Project

Project Location: Portuguese Bend Landslide Complex Area

Project Description: The Portuguese Bend Landslide began moving in 1956, and continued land movement has resulted in significant infrastructure damage to homes, utilities, and roadways. The Portuguese Bend Landslide Complex (PBLC) is located along the south section of the Palos Verdes Peninsula within the City (Project Site). The terminus of the active landslide complex, and generally the southwest boundary of the PBLC is the Pacific Ocean as seen in **Figure 1, Project Site Location**. The proposed Project involves a series of recommended mitigation measures which follow a phased-approach to construction and installation. The construction is likely to be implemented in stages, which may occur separately. The anticipated construction phasing as follows: (i) surface fracture infilling; (ii) surface water improvements; and (iii) groundwater mitigation improvements. Periodic field observation should be performed during construction under the supervision of the appropriate California registered Engineer. Post-construction items are anticipated to include long-term maintenance, landslide monitoring, and possible future construction phases.

Potential Environmental Effects of the Project: Based on a preliminary review of the proposed Project consistent with section 15060 of the CEQA Guidelines, the City has determined that an EIR should be prepared for this proposed Project. In addition, consistent with section 15082 of the CEQA Guidelines, the City has identified the following probable environmental effects of the Project, which will be addressed in the EIR for this project:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning
- Noise
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities / Services Systems
- Wildfire

The City has determined that there is not a likelihood of potentially significant effects related to the following environmental topics:

- Agricultural and Forestry Resources
- Mineral Resources
- Population / Housing
- Public Services

The EIR will include information on the reasons why these effects were determined not to be significant and are therefore not addressed in detail in the EIR.

The detailed project description, location, and potential environmental effects are contained in an Initial Study that is on file with the Public Works Department at City Hall, 30940 Hawthorne Boulevard, Rancho Palos Verdes, and is available for review between the hours of 7:30 a.m. and 5:30 p.m., Monday through Thursday, and 7:30 a.m. and 4:30 p.m., on Friday. Furthermore, the Notice of Preparation of an EIR / Initial Study is available for public review on the City's website at www.rpvca.gov. To access the Initial Study on the City's Website or other information regarding the proposed project, log on to www.rpvca.gov and click on Departments, click on Public Works, then click on Portuguese Bend Landslide Mitigation Work.

PUBLIC SCOPING MEETING DATE, TIME, AND LOCATION: The City of Rancho Palos Verdes will conduct a special Scoping Meeting held on December 19, 2020, at 12:30 PM. The meeting will be a Hybrid (in-person virtual) Meeting. The purpose of the Scoping Meeting is to solicit oral public comments regarding issues to be addressed in the EIR. The Scoping Meeting will provide information regarding the proposed Project and the anticipated scope of analyses to be contained in the EIR. The City encourages all interested individuals and organizations to attend this hybrid (in-person/virtual) meeting. Written comments may be submitted before the Scoping Meeting.

Date: Saturday, December 19, 2020

Time: 12:30 PM

Location: Hesse Park, McTaggart Hall, 29301 Hawthorne Boulevard, Rancho Palos Verdes, CA. 90275 and via teleconference using the Zoom platform.

THE CITY COUNCIL CHAMBERS WILL BE OPEN TO THE PUBLIC WITH SIGNIFICANTLY LIMITED SEATING

Pursuant to Section 3 of Executive Order N-29-20, issued by Governor Newsom on March 17, 2020, this meeting for Saturday December 19, 2020 will be conducted through a hybrid combination of in-person attendance with not less than three members of the City Council, invited staff, and limited members of the public at Hesse Park McTaggart Hall, 29301 Hawthorne Boulevard and via teleconference using the Zoom platform.

To maximize public safety while maintaining transparency and public access, those members of the public wishing to participate in City Council meetings are encouraged to do so in one of the following ways:

1. Virtual Platform (Zoom): If you wish to speak during the meeting, please fill out the online request form at rpvca.gov/participate by 4:00 P.M. on Friday December 18, 2020. Upon successful submission, you will receive an email with further instructions on how to connect to the meeting.

2. Comments: If you simply wish to make a written comment, please submit via email to CC@rpvca.gov or by mail to 30940 Hawthorne Blvd., Rancho Palos Verdes, CA 90275. Comments received by 3:00P.M. on Friday December 18, 2020 will be forwarded to the City Council prior to the meeting for consideration. Otherwise, they will be included as late correspondence the following day.
3. In person at Hesse Park: Members of the public wishing to speak in person may be requested to sign in or complete a speaker's card, available during the meeting, and provide the same to the City Clerk. The City Council may limit the number of individuals in the meeting room at any one time pursuant to guidance from public health officials. Each member of the public must also wear a face covering of the nose and mouth at all times during the course of the meeting unless and until invited to speak at the podium.

In compliance with the Americans with Disabilities Act, if you require a disability-related modification or accommodation to participate in this meeting, please contact the City Clerk's Office at least 48 hours prior to the meeting at Cityclerk@rpvca.gov or 310-544-5217. Staff will use its best efforts to provide reasonable accommodations to provide as much accessibility as possible while also maintain public safety.

Public Review Period: The City has determined to make this NOP available for public review and comment pursuant to Title 14, section 15082(b) of the California Code of Regulations. The comment period for the NOP begins on November 12, 2020 and ends on January 15, 2021 at 4:30 p.m.

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the EIR.

Please direct all written comments or general inquiries to the following address:

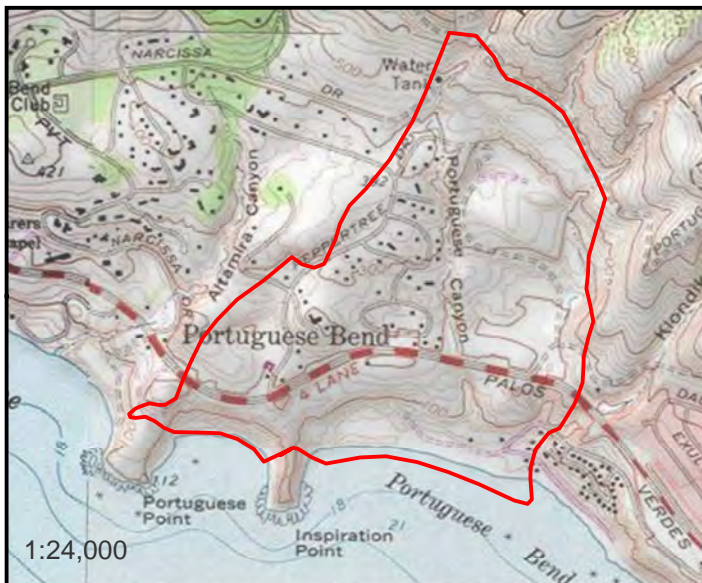
City of Rancho Palos Verdes
Public Works Department
Attn: Ron Dragoo, City Engineer
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391
310-544-5228 or publicworks@rpvca.gov


All written responses will be included as Appendices in the Draft EIR and their contents considered in accordance with State and City environmental guidelines.

Date: November 12, 2020

 for Ron Dragoo, City Engineer

Name and Title:



 Project Site Location

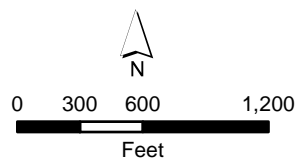


Figure 1
Portuguese Bend Landslide Mitigation
Project Site Location

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #**Project Title:** Portuguese Bend Landslide Mitigation Project

Lead Agency: City of Rancho Palos Verdes

Contact Person: Ron Drago

Mailing Address: 30940 Hawthorne Boulevard

Phone: 310.544.5228

City: Rancho Palos Verdes

Zip: 90275

County: Los Angeles

Project Location: County: Los Angeles

City/Nearest Community: Rancho Palos Verdes

Cross Streets: Palos Verdes Drive South / Peppertree Drive

Zip Code: 90275

Longitude/Latitude (degrees, minutes and seconds): 33 ° 44 ' 30.13 " N / 118 ° 21 ' 52.78 " W Total Acres: 750

Assessor's Parcel No.: 7572001905 & 7572001900

Section: 17, 8

Twp.: 5 S

Range: 14 W

Base:

Within 2 Miles: State Hwy #:

Waterways: Pacific Ocean

Airports:

Railways:

Schools: Mira Catalina

Document Type:CEQA: ☒ NOP☐ Draft EIRNEPA: ☐ NOIOther: ☐ Joint Document☐ Early Cons☐ Supplement/Subsequent EIR☐ EA☐ Final Document☐ Neg Dec

(Prior SCH No.)

☐ Draft EIS☐ Other:☐ Mit Neg Dec

Other:

☐ FONSI**Local Action Type:**☐ General Plan Update☐ Specific Plan☐ Rezone☐ Annexation☐ General Plan Amendment☐ Master Plan☐ Prezone☐ Redevelopment☐ General Plan Element☐ Planned Unit Development☐ Use Permit☒ Coastal Permit☐ Community Plan☐ Site Plan☐ Land Division (Subdivision, etc.)☒ Other: LANDSLIDE CONTROL**Development Type:**☐ Residential: Units _____ Acres _____☐ Office: Sq.ft. _____ Acres _____ Employees _____☐ Commercial: Sq.ft. _____ Acres _____ Employees _____☐ Industrial: Sq.ft. _____ Acres _____ Employees _____☐ Educational: _____☐ Recreational: _____☐ Water Facilities: Type _____ MGD _____☐ Transportation: Type _____☐ Mining: Mineral _____☐ Power: Type _____ MW _____☐ Waste Treatment: Type _____ MGD _____☐ Hazardous Waste: Type _____☒ Other: Landslide Control**Project Issues Discussed in Document:**☒ Aesthetic/Visual☐ Fiscal☐ Recreation/Parks☒ Vegetation☐ Agricultural Land☒ Flood Plain/Flooding☐ Schools/Universities☒ Water Quality☒ Air Quality☒ Forest Land/Fire Hazard☐ Septic Systems☐ Water Supply/Groundwater☒ Archeological/Historical☒ Geologic/Seismic☐ Sewer Capacity☒ Wetland/Riparian☒ Biological Resources☐ Minerals☒ Soil Erosion/Compaction/Grading☐ Growth Inducement☒ Coastal Zone☒ Noise☐ Solid Waste☒ Land Use☒ Drainage/Absorption☐ Population/Housing Balance☒ Toxic/Hazardous☐ Cumulative Effects☐ Economic/Jobs☐ Public Services/Facilities☒ Traffic/Circulation☐ Other:**Present Land Use/Zoning/General Plan Designation:**

Agricultural/socio-cultural, agricultural/residential, Zoning: Open Space

Project Description: (please use a separate page if necessary)

The Portuguese Bend Landslide Mitigation Project (Project) would control the existing landslide area. The proposed Project involves a series of recommended mitigation measures which follow a phased-approach to construction and installation. The construction is likely to be implemented in stages, which may occur separately. The anticipated construction phasing as follows: (i) surface fracture infilling; (ii) surface water improvements; and (iii) groundwater mitigation improvements. Periodic field observation should be performed during construction under the supervision of the appropriate California registered Engineer. Post-construction items are anticipated to include long-term maintenance, landslide monitoring, and possible future construction phases.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".
If you have already sent your document to the agency please denote that with an "S".

<input checked="" type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District # <u>7</u>	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # <u>4</u>
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input checked="" type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # <u>5</u>	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input checked="" type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	<input checked="" type="checkbox"/> Other: <u>Portuguese Bend Sewer District</u>
<input type="checkbox"/> Health Services, Department of	<input checked="" type="checkbox"/> Other: <u>Los Angeles County Flood Control District</u>
<input type="checkbox"/> Housing & Community Development	
<input type="checkbox"/> Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

Starting Date November 12, 2020 Ending Date January 15, 2021

Lead Agency (Complete if applicable):

Consulting Firm: <u>Chambers Group Inc.</u>	Applicant: <u>City of Rancho Palos Verdes, Ron Dragoo</u>
Address: <u>5 Hutton Centre Drive, Suite 250</u>	Address: <u>30940 Hawthorne Boulevard</u>
City/State/Zip: <u>Santa Ana, CA 92707</u>	City/State/Zip: <u>Rancho Palos Verdes, California 90275</u>
Contact: <u>Kelene Strain</u>	Phone: <u>310-544-5228</u>
Phone: <u>213.623.1859 xt 7507</u>	

Signature of Lead Agency Representative:  Date: 11/12/2020

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

**PORTUGUESE BEND LANDSLIDE MITIGATION
PROJECT**

RANCHO PALOS VERDES, CALIFORNIA

Prepared for:

CITY OF RANCHO PALOS VERDES
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275

Prepared by:

CHAMBERS GROUP, INC.
5 Hutton Centre Drive, Suite 750
Santa Ana, California 92707
(949) 261-5414

November 2020

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SECTION 1.0 – PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

1.1 PROJECT BACKGROUND AND PURPOSE

The Portuguese Bend Landslide began moving in 1956, and continued land movement has resulted in significant infrastructure damage to homes, utilities, and roadways. The City of Rancho Palos Verdes (City) and its citizens are seeking to control the landslide to preserve infrastructures, open lands, preserve natural vegetation and recreational features of the Palos Verdes Nature Preserve, reduce soil erosion losses, and reduce health and safety concerns related to the integrity of the surrounding road system, sewer system and other infrastructure (proposed Project).

1.2 PROJECT LOCATION AND SITE CHARACTERISTICS

The Portuguese Bend Landslide Complex (PBLC) is located along the south section of the Palos Verdes Peninsula within the City (Project Site). The terminus of the active landslide complex, and generally the southwest boundary of the PBLC is the Pacific Ocean as seen in **Figure 1, Project Site Location**. The PBLC area is approximately 285 acres, however the area of land which contributes to the landslide instability is much larger, and approximately 750 acres. The Project Site also includes approximately 96 acres of preserve land associated with the Palos Verdes Peninsula Land Conservancy, Portuguese Bend and Abalone Cove conservancy areas as shown in **Figure 2, Palos Verdes Peninsula Land Conservancy Areas**.

Several residences exist on the northwestern side of the Project Site while a series of trail networks are located on the eastern side of the Project Site and south of Palos Verdes Drive South. Vegetation consist of mostly native coastal vegetation. Due to the land sliding, surface fractures exist throughout the site. As previously mentioned, the Pacific Ocean is located south of the Project Site which contains several coastal bluffs.

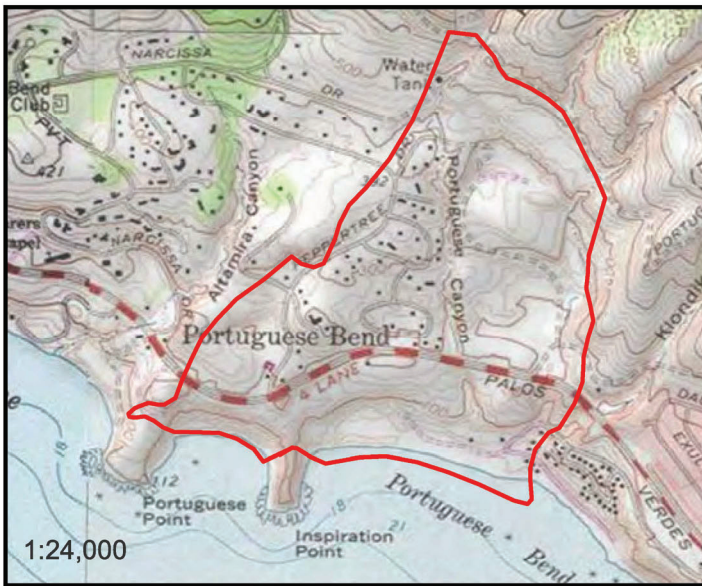
Two parks exist within the Project Site boundaries; the Abalone Cove Shoreline Park which features two beach areas (Abalone Cove and Sacred Cove) and Founders Park which is approximately 5.5 acres located within the northern portion of the site.

1.2.1 General Plan Designation/Zoning

The General Plan Land Use Element designates the site as agricultural/socio-cultural and agricultural/residential (≤ 1 dwelling unit per acre) (General Plan Land Use Map 1975) as shown in **Figure 3, Land Use Designation**. The Project Site is zoned as open space – hazard (oh) (City of Rancho Palos Verdes 2012) as shown in **Figure 4, Zoning**. Additionally, a portion of the Project Site is located within the Coastal Specific Plan Area designated as mostly hazard area and partially as agricultural area (City of Rancho Palos Verdes 1978) as shown in **Figure 5, Coastal Specific Plan**. Portions of the Project Site are also located in the City's OC-3 Urban Appearance Overlay Control District.

1.2.2 Surrounding Land Uses

Surrounding the Project Site are residential uses to the east and west. Directly north of the Project Site is more of the Portuguese Bend Preserve followed by additional residential uses. The Pacific Ocean is located to the south of the Project Site.



 Project Site Location

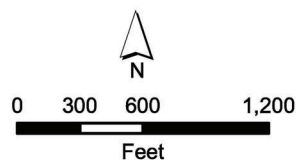
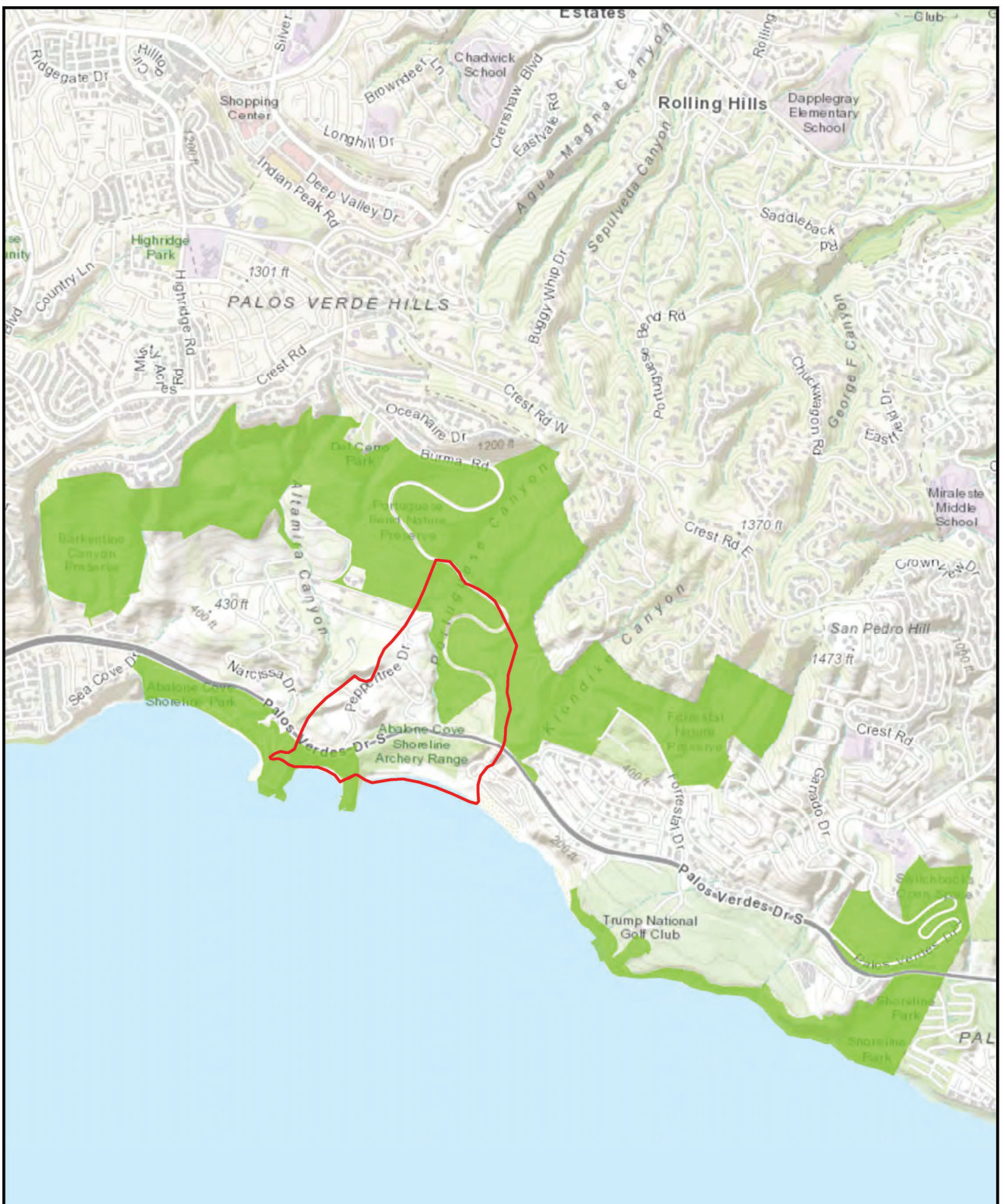


Figure 1
Portuguese Bend Landslide Mitigation
Project Site Location



- Project Site Location
- Conservancy Areas



0 1,000 2,000 4,000
Feet

Figure 2
Portuguese Bend Landslide Mitigation
Palos Verdes Peninsula Conservancy Areas

Name: 21243 PLAN Fig 2 Palos Verdes Peninsula Land Conservancy Areas.Mxd
Print Date: 10/26/2020, Author: pcarios



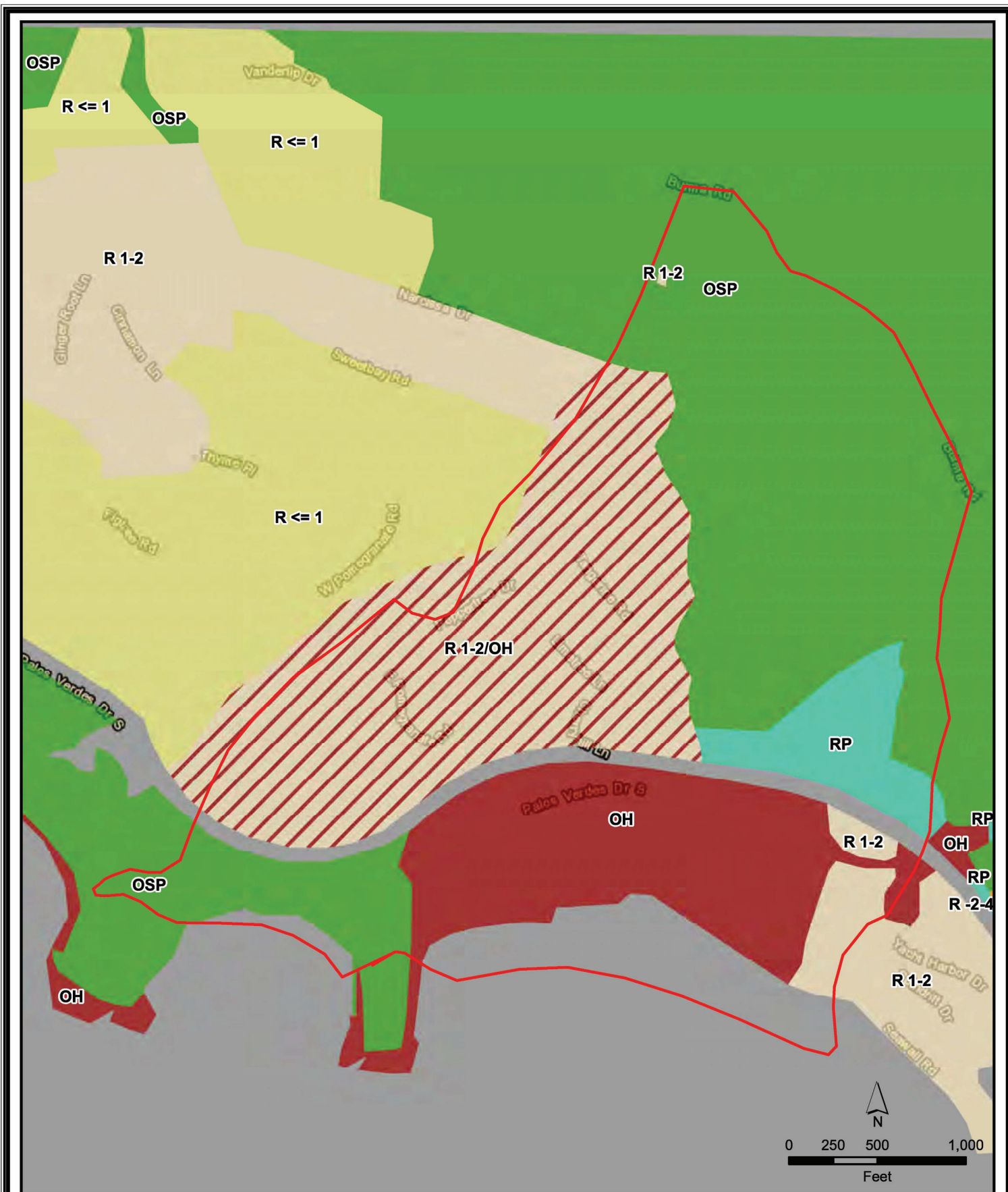
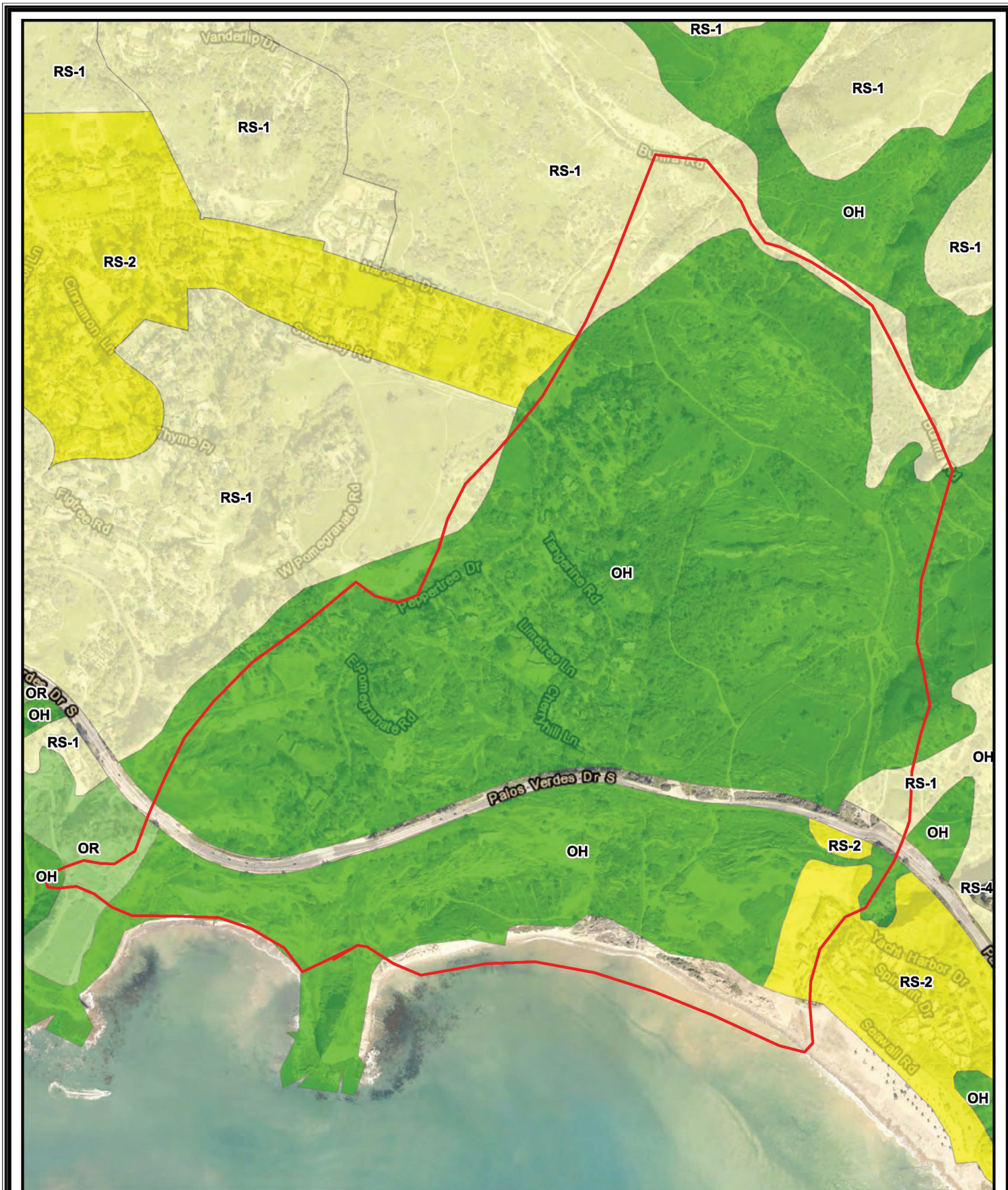


Figure 3
Portuguese Bend Landslide Mitigation
Land Use Designation

- Project Site Location
- Land Use Designation**
- | | |
|--|--|
| Open Space Hazard | Residential 1-2/Open Space |
| Open Space Preservation | Residential 2-4 DU/Acre |
| Recreational Passive | Residential <= 1 DU/Acre |
| Residential 1-2 DU/Acre | |



Project Site Location

Zoning

- Open Space - Hazard
- Open Space - Recreational
- Residential Single - Lot > 1 Acre
- Residential Single - Lot > 20,000 Square Feet

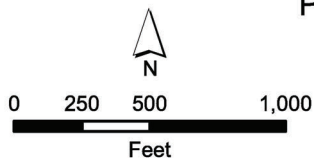
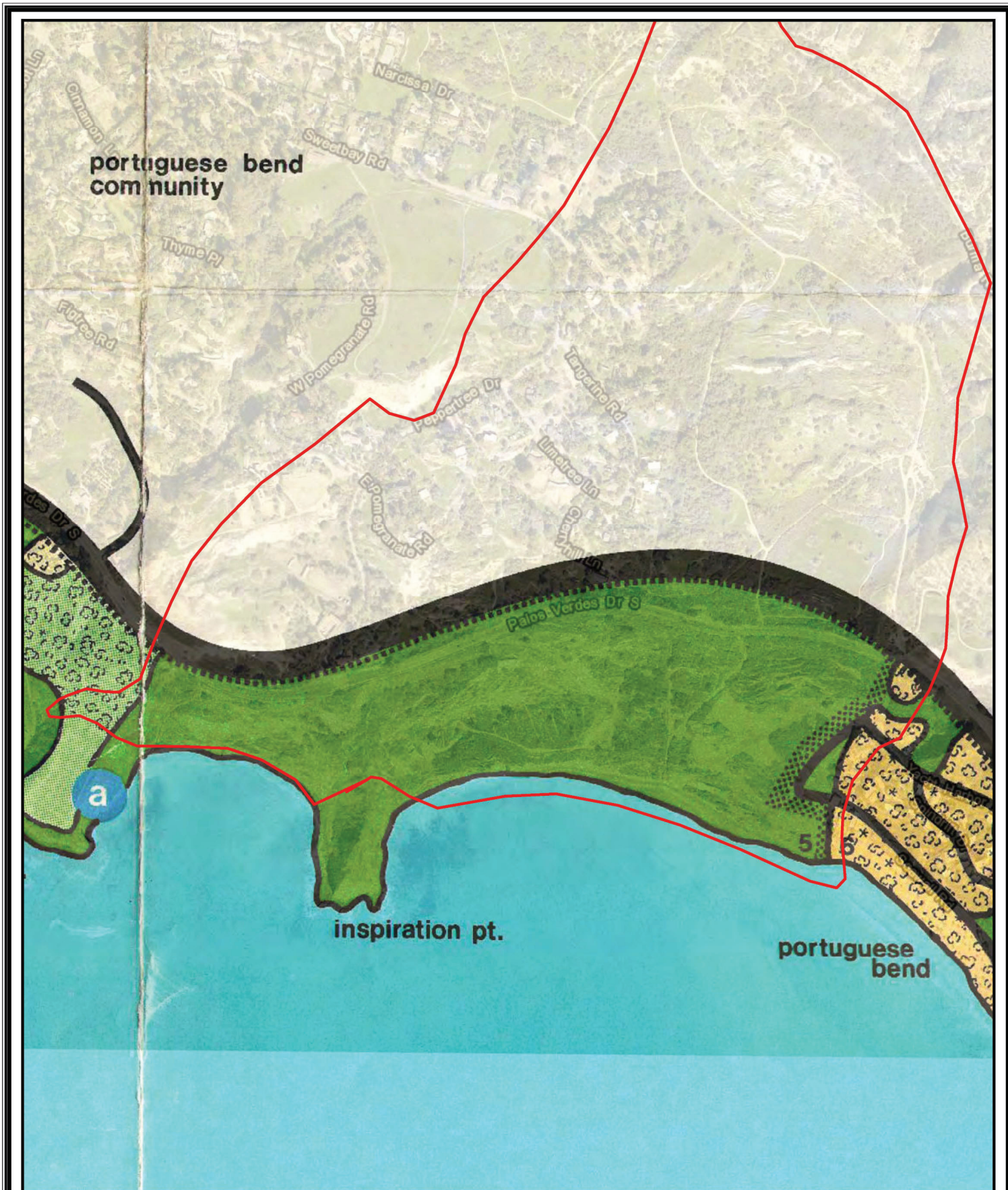


Figure 4
Portuguese Bend Landslide Mitigation
Zoning



- ▬ Project Site Location
- Coastal Specific Plan**
- Hazard Areas ■ Residential - ≤ 1 d.u./acres
- Parkland
- Control Districts**
- Natural

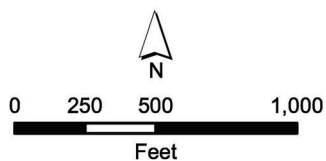


Figure 5
Portuguese Bend Landslide Mitigation
Coastal Specific Plan

1.3 PROJECT DESCRIPTION

The Portuguese Bend Landslide Mitigation Project (Project) would control the existing landslide area. The proposed Project involves a series of recommended mitigation measures which follow a phased-approach to construction and installation. The construction is likely to be implemented in stages, which may occur separately. The anticipated construction phasing as follows: (i) surface fracture infilling; (ii) surface water improvements; and (iii) groundwater mitigation improvements. Periodic field observation should be performed during construction under the supervision of the appropriate California registered Engineer. Post-construction items are anticipated to include long-term maintenance, landslide monitoring, and possible future construction phases.

1.4 PROJECT CONSTRUCTION

The construction of the Project would last up to approximately 14 months for Phase I and Phase II. The time required for Phase III will rely on the outcome of these two phases. Construction would occur between the hours of Monday through Friday 7:00 a.m. and 6:00 p.m. and Saturday 9:00 am and 5:00 pm with the exception of Sundays and federal holidays in accordance with City noise standards.

Two separate staging areas will be utilized for construction equipment as shown in **Figure 6, Staging Areas**.

Construction activities would be expected to include site preparation, fencing, mowing, grading, drilling, etc. Site preparation would involve access paths, working platforms, staging areas, and other temporary site features as needed to perform the construction. These items would be established in the field during the construction mobilization. Site preparation and construction of the Project would be in accordance with all federal, state, and City zoning codes and requirements. Noise-generating construction activities would be limited to the construction hours noted above. All stationary equipment and machines with the potential to generate a significant increase in noise or vibration levels would be located away from noise receptors to the extent practicable. The contractor would conduct construction activities in such a manner that the maximum noise levels at the affected buildings would not exceed established noise levels.

1.4.1 Construction Phase I -Surface Fracture Infilling

Surface fracture infilling will be performed during the first phase of construction. These existing fractures are a few feet wide and some are as deep as 15 feet. The fractures intercept stormwater runoff where this water discharges into the ground. The identified fractures should be infilled with a controlled low strength flowable/pumpable fly ash-based slurry conforming to the Standard Specification Section 201-6, Controlled low strength material and the associated mix design. This is intended to eliminate storm runoff from easily becoming part of the groundwater and is an important component in efforts to minimize landslide-related ground movement.

After the initial fracture infilling event, the City will perform periodic observation to identify fractures which may open in the future due to ongoing landslide movement. Fractures identified during periodic observation should be infilled as part of post-construction maintenance.

1.4.2 Construction Phase II – Surface Water Improvements

Surface water improvements will be installed, which include the following:

- Engineered swales;
- Flow reduction area (approximately 8 acres);

- Installation of new 36-inch-diameter pipe below Burma Road using trenchless techniques;
- Removal and disposal of existing 36-inch-diameter plastic pipe south of Palos Verdes Drive South and replacement with thick-walled fusion-welded plastic pipe;
- Refurbishment (i.e., cleanout, lining with smooth polymeric material, and structural retrofit if needed) of existing 60-inch-diameter pipe below Palos Verdes Drive South.

1.4.3 Construction Phase III – Groundwater Mitigation Drains (Hydraugers)

Hydraugers will be constructed below grade and designed to alleviate artesian water pressure underground in the landslide area. These will be installed horizontally, beneath the active movement zone of the landslide. Approximate locations of the hydraugers are shown in **Figure 7, Hydrauger Locations**. The groundwater mitigation program is planned to be implemented in three sub-phases. The sub-phases generally consist of: (i) preparatory work and instrumentation; (ii) installation of up-gradient drains using horizontal drilling; and (iii) installation of down-gradient drains using directional drilling. The pace and sequence of construction within each sub-phase is likely to require adjustment based on field observations.



- ▬ Project Site Location
- Staging Areas

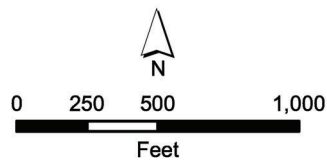


Figure 6
Portuguese Bend Landslide Mitigation
Staging Areas



- Project Site Location
Hydrauger Locations
 Directional/Gravity Flow
 Directional/Pump Assisted Flow
 Horizontal/Gravity Flow

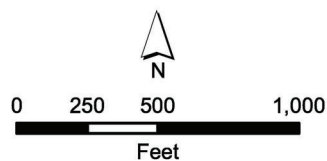


Figure 7
 Portuguese Bend Landslide Mitigation
 Hydrauger Locations

1.5 REQUIRED PERMITS AND APPROVALS

As required by the *CEQA Guidelines*, this section provides, to the extent the information is known, a list of the agencies that are expected to use this Initial Study (IS) in their decision making and a list of permits and other approvals required to implement the project. The project will obtain or comply with the following permits:

- Clean Water Act Section 404 Permit
- Clean Water Act Section 401 Water Quality Certification
- California Department of Fish and Game Code Section 1602 (Streambed Alteration Notification)
- Construction General Permit Order 2009-0009-DWQ
- Potential local or county permits, as applicable

1.5.1 Lead Agency Approval

The Environmental Analysis or Environmental Impact Report must be certified by the City Council (Council) as to its adequacy in complying with the requirements of the California Environmental Quality Act (CEQA) before taking any action on the proposed Project. The Council will consider the information contained in the EIR in making a decision to approve or deny the proposed Project. The analysis in the EIR is intended to provide environmental review for the whole of the proposed Project, including the project planning, site clearance, site excavation, and installation of project improvements in accordance with CEQA requirements.

The lead agency for the proposed Project would be the City of Rancho Palos Verdes.

1.5.2 Reviewing Agencies

Reviewing Agencies include those agencies that do not have discretionary powers but that may review the Environmental Analysis or EIR for adequacy and accuracy. Potential Reviewing Agencies include the following:

State Agencies

- California Coastal Commission
- California Department of Fish and Wildlife
- United States Army Corps of Engineers
- California Department of Water Resources

Regional Agencies

- Palos Verdes Peninsula Land Conservancy
- Portuguese Bend Sewer District
- Abalone Cove Landslide Abatement District
- Los Angeles County Fire Department
- Los Angeles County Sheriff's Department
- South Coast Air Quality Management District
- Los Angeles County Flood Control District
- Sanitation District of Los Angeles County

SECTION 2.0 – ENVIRONMENTAL DETERMINATION

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

<input checked="" type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input checked="" type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology /Soils	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Hazards & Hazardous Materials
<input checked="" type="checkbox"/> Hydrology /Water Quality	<input checked="" type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input checked="" type="checkbox"/> Recreation	<input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Utilities /Service Systems	<input checked="" type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

2.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐
2. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☐
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☒
4. I find that the proposed project **may have a “potentially significant impact” or “potentially significant unless mitigated impact”** on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐
5. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Signature

Date

Name

Title

SECTION 3.0 – EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

*Note: Instructions may be omitted from final document.

SECTION 4.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

4.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. The Project Site is located partially within the Coastal Zone with views of the Pacific Ocean in an area containing scenic and visual qualities. The proposed Project would close some existing fissures on the site and may have the potential to impact a scenic vista. A detailed analysis of the potential impacts on visual resources, including those to scenic vistas, will be included in the EIR.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The Project Site does not contain scenic trees, rock outcroppings, historic buildings or other known scenic resources. Further, the nearest scenic highway is located over 13 miles northeast of the Project Site (Caltrans 2020) For these reasons, there would be no impact in this regard and no further discussion is required.

c) Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The Project is largely undeveloped land within an urbanized area. The repair of the Rancho Palos Verdes Landslide Complex would further prevent the hillside from eroding into the ocean which would long term improve the aesthetic of the area. Construction of the Project

would temporarily impact the scenic quality of the site due to construction equipment as discussed in (a) above; however, the project is considered necessary for erosion mitigation. Therefore, there would be no conflict with applicable zoning or other regulations governing scenic quality. Impacts would be less than significant, and no further discussion is required.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant Impact. Construction of the proposed Project would be required to adhere to Rancho Palos Verdes Municipal Code (RPVMC) §17.56.020 which allows construction from 7:00 AM to 6:00 PM Monday through Friday and 9:00 AM to 5:00 PM on Saturdays therefore lighting would not be required during construction. Construction the proposed Project would require construction equipment which may result in temporary glare impacts. However, these glare impacts would be temporary and would cease upon completion of the Project.

Operation of the proposed Project would not construct any structures or buildings that would result in permanent increases to lighting or glare. Impacts would be less than significant and no further discussion is required.

4.2 AGRICULTURE & FORESTRY RESOURCES

2.	AGRICULTURE & FOREST RESOURCES. (In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. The General Plan notes that the Portuguese Bend slide area is the first major agricultural area (City of Rancho Palos Verdes 1975). The General Plan Land Use Element designates the site as agricultural/socio-cultural and agricultural/residential (≤ 1 dwelling unit per acre) (City of Rancho Palos Verdes 1975). The Project Site is zoned as open space – hazard (oh) (City of Rancho Palos Verdes 2012) and is not currently used for agricultural uses. The Project Site is listed as an area which falls outside of the Natural Resources Conservation Service (NRCS) soils survey area, not mapped by the Farmland Mapping and Monitoring Program (FMMP) (DOC 2016). This site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, there would be no impacts to important farmland and no further discussion is required.

- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. As previously mentioned, the Project Site is zoned as oh and is not under a Williamson Act Contract (DOC 2019). No impact to land zoned for agricultural use or subject to a Williamson Act Contract would occur and no further discussion is required.

- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. The Project Site is zoned as oh. No impact to land zoned as forestland, timberland, or Timberland Production land would occur and no further discussion is required.

- d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. The Project Site is not forest land, therefore no impact to forest land would occur and no further discussion is required.

- e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or the conversion of forest land to non-forest use?*

No Impact. Agricultural uses and forest land are not located in the immediate vicinity or on the Project Site. The Project Site is surrounded by residential uses to the east and west, and open space uses to the north. No impact would occur and no further discussion is required.

4.3 AIR QUALITY

3.	AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Potentially Significant Impact. The South Coast Air Quality Management District (SCAQMD) monitors air quality within the South Coast Air Basin, which includes the portion of Los Angeles County containing the Project Site. The proposed Project would control the Rancho Palos Verdes Landslide Complex to prevent further sliding in the area. It is not anticipated that a substantial number of new vehicle trips would be created. Thus, long-term air quality impacts during the operational phase are not anticipated. An air quality and greenhouse gases technical report will be prepared for the proposed Project to determine whether short-term construction emissions would exceed the emissions budgeted for the Project Site in the applicable air quality management plan. Further analysis is required and will be included in the EIR.

- b) *Would the project 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?*

Potentially Significant Impact. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. The air quality technical report prepared for the proposed Project will

evaluate the potential for cumulative air quality impacts. Further analysis is required and will be included in the EIR.

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Potentially Significant Impact. The SCAQMD indicates that sensitive receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Operation of the proposed Project would not be anticipated to generate substantial new sources of pollutant concentrations. The air quality technical report prepared for the proposed Project will evaluate the potential for individual receptors to be exposed to unhealthy pollutant concentrations during construction. Further analysis is required and will be included in the EIR.

d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Potentially Significant Impact. Construction activities may result in short-term fugitive dust or other potential emissions. Further evaluation of the significance of this impact is required and will be included in the EIR.

4.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as candidate, sensitive or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Potentially Significant Impact. The proposed Project area is undisturbed open space. There is a potential for the site to contain habitat that is potentially suitable for sensitive and/or special status plant and wildlife species. However, a natural community conservation plan (NCCP)/habitat conservation plan (HCP) was prepared to maximize benefits to wildlife and vegetation communities and provide for the comprehensive management and conservation of various listed and/or sensitive species. The Rancho Palos Verdes NCCP and HCP that was adopted in 2019. Project conformance with the NCCP will be required, and mitigation measures will be incorporated. A biological resources technical report will be prepared to evaluate potential impacts to sensitive and/or special status species. Further analysis is required and will be included in the EIR.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Potentially Significant Impact. According to the U.S. Fish and Wildlife (USFWS) National Wetlands Inventory there are two dry rivers that run through the Project Site classified as Riverine habitat (USFWS 2020). The biological resources technical report prepared for the proposed Project will identify any potential impacts on riparian habitat. Further analysis is required and will be included in the EIR.

- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Potentially Significant Impact. As previously mentioned, there are two USFWS riverine designated streams on the Project Site. Additionally, runoff from the Project Site travels directly into the Pacific Ocean identified as USFWS as estuarine and marine wetland. The biological resources technical report prepared for the proposed Project will identify any potential impacts to wetlands. Further analysis is required and will be included in the EIR.

- d) *Would the project Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Potentially Significant Impact. As previously mentioned, the Project Site may contain habitat suitable to support a sensitive natural community and wildlife corridors. The biological resources technical report prepared for the proposed Project will evaluate potential impacts to sensitive habitat and wildlife corridors. While the Project does not propose development of structures that would impeded wildlife movement or migration, further analysis is warranted.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Potentially Significant Impact. The biological resources technical report prepared for the proposed Project will identify protected biological resources on the Project Site (if any), as well as potential impacts to policies or ordinances protecting such resources. Further analysis is required and will be included in the EIR.

- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Potentially Significant Impact. The City's General Plan designates portions of the Project Site as wildlife habitat area for preservation (City of Rancho Palos Verdes 1975). The biological resources technical report prepared for the proposed Project will assess the any potential impacts to such conservation and habitat plans. Further analysis is required and will be included in the EIR.

4.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Potentially Significant Impact. A detailed cultural resources technical report will be prepared for the proposed Project, which will identify any significant historical resources in the Project area, and will assess any potential impacts to such resources. Further analysis is required and will be included in the EIR.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Potentially Significant Impact. The cultural resources technical report prepared for the proposed Project will identify any archaeological resources in the Project area, and will assess potential impacts to such resources. Further analysis is required and will be included in the EIR.

- c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Potentially Significant Impact. No known burial sites are located within the Project Site, however, the cultural resources technical report will assess potential impacts related to disturbance of unknown human remains. Further analysis is required and will be included in the EIR.

4.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Potentially Significant Impact. The proposed Project would control the Rancho Palos Verdes Landslide Complex to prevent further sliding in the area. Energy for the project would only be required during construction and would not require additional capacity on a local or regional scale. An energy technical report will be prepared for the proposed Project to determine whether short-term construction emissions would result in wasteful, inefficient, or unnecessary consumption of energy resources. Further analysis is required and will be included in the EIR.

- b) *Would the project Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Potentially Significant Impact. It is not expected that the proposed Project would conflict or obstruct the goals and policies of the City's Emissions Reduction Action Plan. However, the energy technical

report would address consistency with applicable plans. Further analysis is required and will be included in the EIR.

4.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a 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 Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) i) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a 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 Special Publication 42.*

No Impact. The nearest fault is the Cabrillo Fault located over one mile north of the Project Site (USGS 2020). The Cabrillo Fault is not designated as an Alquist-Priolo Fault and therefore no impacts would occur. No further analysis is required.

ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

No Impact. As previously mentioned, the nearest fault is the Cabrillo Fault located over one mile away from the Project Site. The proposed Project would not construct any buildings or structures and therefore would not risk loss, injury, or death from strong seismic ground shaking. No impacts would occur and no further analysis is required.

iii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

No Impact. According to the Department of Conservation, no portion of the Project Site is located within a liquefaction zone (DOC 2020). Additionally, the proposed Project would not construct any buildings or structures and therefore would not risk loss, injury, or death from strong seismic ground shaking. No impacts would occur and no further analysis is required.

iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Potentially Significant Impact. The Project Site is located in the PBLC which is an active landslide area. The proposed Project would control the current landslide to prevent further issues. Further analysis of land sliding potential is required and will be provided in the EIR.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Potentially Significant Impact. Construction activities would result in ground surface disruption that could result in the potential for erosion to occur. A geotechnical report will be prepared for the proposed Project that will include an analysis of potential erosion. Further analysis is required and will be provided in the EIR.

c) *Would the project 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?*

Potentially Significant Impact. Construction activities would result in ground surface disruption that could result in the potential for the soil to become unstable. A geotechnical report will be prepared for the proposed Project that will include an analysis of the soil stability. Further analysis is required and will be provided in the EIR.

d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Potentially Significant Impact. The geotechnical investigation report prepared for the proposed Project will address soil conditions in the Project vicinity with respect to expansion potential. Further analysis is required and will be provided in the EIR.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. The proposed Project would not include the construction of any structures or buildings that would result in additional wastewater generation. Septic tanks are not proposed and therefore no impacts would occur. No further analysis is required.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Less than Significant Impact. A detailed cultural paleontological resources technical report is being prepared for the proposed Project. The field results indicate that Monterey formations and Quaternary Terrace deposits are located within the project area and have yielded fossil recoveries. Observations from a recent field survey indicate that these formations have been impacted by the landslide and have little possibility to have significant cultural resources. As such, less than significant impacts would occur. No further analysis is required.

4.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Potentially Significant Impact. As the proposed Project is intended to control the landslide, it is not anticipated that a substantial net increase in greenhouse gas emissions would be generated during operation. However, construction of the proposed Project would generate greenhouse gas emissions. Construction-related emissions would be generated from off-road construction equipment and on-road vehicle exhaust. A greenhouse gases technical report will be prepared for the proposed Project to determine if any potentially significant impacts related to greenhouse gas emissions would occur. A detailed analysis of this issue will be included in the EIR. Further analysis is required and will be included in the EIR.

- b) *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Potentially Significant Impact. As discussed in Section 4.8a above, the proposed Project would generate greenhouse gas emissions during construction. In addition to analyzing impacts related to such emissions, the EIR will also include a detailed analysis of the Project's compliance with applicable plans policies, and regulations adopted for the purposes of reducing greenhouse gas emissions. Further analysis is required and will be included in the EIR.

4.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less than Significant Impact. Construction of the proposed Project would use hazardous materials typical of construction (i.e., fuel for construction equipment, materials for road construction). However, the transport, use, and disposal of construction-related hazardous materials would comply with applicable laws and regulations for such activities, such as the Hazardous Materials

Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Operation of the proposed Project would not require the routine transport, use, or disposal of hazardous materials. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant, and no further analysis is required.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less than Significant Impact. Construction activities for the proposed Project would involve the limited transport, storage, use, or disposal of hazardous materials, such as fuel for construction equipment and materials for road construction. These types of materials, however, are not acutely hazardous, and all storage, handling, and disposal of these materials would comply with existing regulations. Compliance with regulations would ensure a less than significant impact related to creating a significant hazard to the public through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment with regard to construction of the proposed Project. No further analysis is required.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

No Impact. The nearest school is Chadwick School located at 26800 South Academy Drive, which is over 1.8 miles north of the Project Site. There are no schools within a one-quarter mile radius and therefore no impacts would occur.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Less than Significant Impact. A review of Geotracker (SWRCB 2020) and Envirostor (Department of Toxic Substances 2020) was completed. The review of the databases determined that there is one closed case of a Leaking Underground Storage Tank (LUST) Cleanup Site located within the Project Site boundaries on the northern portion of the site. However, this case was cleaned up and closed as of December 3, 1996. Construction activities would occur approximately 300 feet northeast of this clean up location and this site would not be disturbed. There are no other hazardous materials sites on the Project Site or within a one quarter mile radius. Impacts would be less than significant, and no further analysis is required.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The nearest airport to the Project Site is over 3.5 miles north. The Torrance Municipal Airport – Zamperini Field serves as a general aviation airport, but is mostly home to private aircraft.

The Project Site is not within 2 miles of airport or within an airport land use plan. No impacts would occur and no further analysis is required.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Potentially Significant Impact. Palos Verdes Drive is designated by the General Plan as a disaster route (City of Rancho Palos Verdes 1975). As previously mentioned, there is a potential that portions of Palos Verdes Drive may be affected temporarily during construction. For this reason, further analysis is required and will be included in the EIR.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Potentially Significant Impact. The proposed Project would control the existing Rancho Palos Verdes Landslide Complex area and would not construct any buildings or structures. However, construction would occur within an area designated as a Local Responsibility Area (LRA) Very High Fire Hazard Zone (VHFHSZ) (CalFire 2011). Further analysis is required and will be included in the EIR.

4.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	iv) Impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*

Potentially Significant Impact. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. As the proposed Project would control the roadway to prevent further sliding in the area, it is not anticipated that a substantial net increase in runoff would be generated at the Project Site during operation. A hydrology and water quality analysis will be prepared for the proposed Project to assess potential impacts to water quality. Further analysis is required and will be included in the EIR.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Potentially Significant Impact. The Project Site is underlain by the West Basin operated by the West Basin Municipal District. The Project would change the existing stormwater drainage which may alter how the groundwater basin is recharged. The hydrology and water quality analysis prepared for the proposed Project will assess potential impacts to groundwater supply and recharge. Further analysis is required and will be included in the EIR.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- i) *result in substantial erosion or siltation on- or off-site;*

Potentially Significant Impact. No streams or rivers cross the Project Site. However, implementation of the proposed Project may have the potential to alter drainage patterns. The hydrology and water quality analysis prepared for the proposed Project will evaluate potential impacts to the alteration of drainage patterns. Further analysis is required and will be included in the EIR.

- ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*

Potentially Significant Impact. As discussed in Section 4.10 c.i. above, the hydrology and water quality analysis prepared for the proposed Project will evaluate potential impacts to the alteration of drainage patterns. Further analysis is required and will be included in the EIR.

- iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*

Potentially Significant Impact. The proposed Project may have the potential to change runoff volumes. The hydrology and water quality analysis prepared for the proposed Project will evaluate potential impacts to the storm drain system due to changes in runoff volumes. Further analysis is required and will be included in the EIR.

- iv) *impede or redirect flood flows?*

Potentially Significant Impact. As discussed in Section 4.10 c.i. above, the hydrology and water quality analysis prepared for the proposed Project will evaluate potential impacts to the alteration of drainage patterns. Further analysis is required and will be included in the EIR.

- d) *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less than Significant Impact. The Project Site is not located in proximity to a closed body of water (e.g., lake or reservoir) or storage tank and would not be subject to hazards associated with inundation from a seiche and would not risk release of pollutants. However, the Project Site is located on a bluff above the Pacific Ocean coastline. A small portion of the Project Site is located within a tsunami inundation hazard area mapped by the California Geological Survey (DOC 2020). However, the landslide mitigation Project does not involve the construction of any structures that could be affected by a tsunami. nor does the project involve the long-term use or storage of hazardous materials that would result in a release of pollutants due to inundation. Conditions under the proposed project would be similar to the existing conditions and would not increase the potential of site inundation. For these reasons, impacts would be less than significant and no further discussion is required.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Potentially Significant Impact. As previously mentioned, the Project would change the existing stormwater drainage which may alter how the groundwater basin is recharged. The hydrology and water quality analysis prepared for the proposed Project will assess potential impacts to groundwater supply and recharge. Further analysis is required and will be included in the EIR.

4.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a) Would the project physically divide an established community?

No Impact. The proposed Project would control the existing Rancho Palos Verdes Landslide Complex area and would not construct any buildings or structures. The Project would not physically divide an established community. No impacts would occur and no further analysis is required.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The General Plan Land Use Element designated the site as agricultural/socio-cultural and agricultural/residential (≤ 1 dwelling unit per acre) (General Plan Land Use Map 1975). The Project Site is zoned as open space – hazard (oh) (City of Rancho Palos Verdes 2012). Additionally, a portion of the site is located within Coastal Zone. Further analysis of the Project's consistency with applicable plans, policies and regulations is required and will be included in the EIR.

4.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The General Plan does not specifically designate the Project Site as an area with known mineral resources (City of Rancho Palos Verdes 1975). Additionally, the Department of Conservation

notes that there are no active mines operations, no land designated with soils known to contain mineral resources, and no land classified as MRZ-2 within the entire City of Rancho Palos Verdes (California Geological Survey 2010). There are no active or abandoned wells within or near the Project Site (DOC 2020). Therefore, no impact to the loss of a known mineral resource would occur and no further discussion is required.

- b) *Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

No Impact. As noted in response 4.12a above, the Project Site does not contain any mineral resources and therefore no impacts would occur and no further discussion is required.

4.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Potentially Significant Impact. The proposed Project may generate increased noise levels during construction activities. A technical noise analysis will be prepared for the proposed Project that will assess the potential for short and long-term increases in noise levels and any associated impacts. Further analysis is required and will be included in the EIR.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Potentially Significant Impact. Construction activities associated with the proposed Project may generate ground-borne vibration from use of heavy equipment. The technical noise analysis prepared

for the proposed Project will evaluate the potential for groundborne noise and vibration, as well as any associated impacts. Further analysis is required and will be included in the EIR.

- c) *For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The nearest airport to the Project Site is over 3.5 miles north. The Torrance Municipal Airport – Zamperini Field serves as a general aviation airport, but is mostly home to private aircraft. The Project Site is not within 2 miles of airport or within an airport land use plan. No impacts would occur and no further analysis is required.

4.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

No Impact. The proposed Project would control the existing Rancho Palos Verdes Landslide Complex area. Construction would require employees that would likely come from the existing employment population. The proposed Project would not directly or indirectly induce population growth. No impact would occur and no further discussion is required.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The Project Site contains several single family residences however, the proposed Project involves controlling the existing slopes and would not demolish or displace any of these houses. No impacts would occur and no further analysis is required.

4.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*

Less than Significant Impact. The proposed Project would not result in an increase in population, and thus, would not generate a need for new or altered fire protection facilities. The proposed Project would be constructed in accordance with all applicable fire codes set forth by the State Fire Marshall and Los Angeles Fire Department. Therefore, the proposed Project would not be considered a fire hazard and would not exceed the capacity of the Los Angeles Fire Department to serve the site or other areas with existing fire protection services. The nearest local fire responders, Station 53 located at 6124 Palos Verdes Drive South, would be notified as appropriate, of traffic control plans during construction so as to coordinate emergency response routing during construction work. The impact would be less than significant and no further discussion is required.

- b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

Less than Significant Impact. The proposed Project would not require additional police protection beyond what is currently provided. The nearest local police station, Palos Verdes Estates Police Department located at 340 Palos Verdes Drive West, would be notified as appropriate, of traffic control plans during construction so as to coordinate emergency response routing during construction work. The impact would be less than significant and no further discussion is required.

- c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

No Impact. The proposed Project would not induce employment or population growth, either directly or indirectly, and would therefore not increase the demand for schools in the area. No impact would occur and no further discussion is required.

- d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

No Impact. The proposed Project would not generate residents that would increase the demand for park facilities. No impact would occur and no further discussion is required.

- e) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

No Impact. The proposed Project would not generate residents that would increase the demand for other public facilities. No impact would occur and no further discussion is required.

4.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) *Would the project 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?*

Potentially Significant Impact. The proposed Project would not result in an increase in population that would increase the use of existing recreational facilities. However, the Project Site contains a

series of trail networks that may require closure during construction. Further analysis is required and will be included in the EIR.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. As mentioned in Section 4.16d above, the proposed Project would not generate residents that would increase the demand for park facilities. The proposed Project does not include the construction of any additional recreational facilities. No impact would occur and no further discussion is required.

4.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d)	Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*

Potentially Significant Impact. The proposed Project is intended to control the Rancho Palos Verdes Landslide Complex, and is not anticipated to create a substantial amount of new vehicle trips during operation. Traffic may be affected temporarily due to construction activities, including the potential closing of portions of Palos Verdes Drive. Additionally, the Project Site contains a number of trail networks that may need to be closed temporarily during construction. A traffic study will be prepared for the proposed Project, including an analysis of construction traffic impacts. Further analysis is required and will be included in the EIR.

- b) *Would the project Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Potentially Significant Impact. CEQA Guidelines Section 15064.3(c) creates a process to change the way that transportation impacts are analyzed under the California Environmental Quality Act (CEQA). Specifically, SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Vehicle Miles

Travelled (VMT) is a key measure of effectiveness with regard to various initiatives intended to reduce emissions, including Green House Gas (GHG) emissions. The traffic study will address any potential impacts to VMT. Further analysis is required and will be included in the EIR.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*

Potentially Significant Impact. The proposed Project would control the Rancho Palos Verdes Landslide Complex and would not alter the existing roadway long term. However, with the potential for roadway closures along portions of Palos Verdes Drive, may result in a temporary increase to hazards. The traffic study will address any potential hazards. Further analysis is required and will be included in the EIR.

- d) *Would the project result in inadequate emergency access?*

Potentially Significant Impact. Palos Verdes Drive is designated by the General Plan as a disaster route (City of Rancho Palos Verdes 1975). As previously mentioned, there is a potential that portions of Palos Verdes Drive may be affected temporarily during construction. For this reason, further analysis is required and will be included in the EIR.

4.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the*

California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Potentially Significant Impact. As noted in Section 4.5a above, a detailed cultural resources technical report will be prepared for the proposed Project, which will identify any significant historical resources in the Project area, and will assess any potential impacts to such resources. Further analysis is required and will be included in the EIR.

- b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Potentially Significant Impact. Public Resources Code Section 21080.3.1 establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potentially significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074. Letters were sent to each representative of seven tribes Native American groups and individuals who may have knowledge of cultural resources in the Project area on August 6, 2020. The Project Applicant is required to comply with existing regulations, including California Public Resources Code Section 21083.2, that specifies a protocol if archaeological resources are discovered during excavation, grading, or construction activities. As the Project would construct on a mostly undisturbed site, impacts to buried Tribal Cultural Resources could be potentially significant. Further analysis is required.

4.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?*

Potentially Significant Impact. The proposed Project would not develop any buildings or structures or result in an increase in population that would require additional water, wastewater, electrical, natural gas or telecommunications facilities. The proposed Project would require small amounts of water, which may result in wastewater for construction activities. However, these activities would be temporary.

The proposed Project involves controlling an existing landslide by utilizing several different methods. One of these methods involves diverting stormwater under the slope so that the water would not cause further erosion. Impacts related to stormwater drainage require further analysis and will be included in the EIR.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal dry and multiple dry years?*

Less than Significant Impact. The proposed Project would require small amounts of water for construction activities. Operation of the Project would not develop any buildings or structures or result in an increase in population that would increase water demand. The proposed Project would not use additional water that would exceed existing capacity. Impacts would be considered less than significant and no further discussion is required.

- c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less than Significant Impact. The proposed Project may generate small amounts of wastewater during construction activities. Operation of the Project would not develop any buildings or structures or result in an increase in population that would increase wastewater generation. The proposed Project would not generate wastewater that would exceed existing capacity. Impacts would be considered less than significant and no further discussion is required.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. Construction activities associated with the Project may generate solid wastes requiring disposal at area landfills. Waste generated during Project construction would be limited to vegetation debris. Waste generation would be temporary during construction and would not reduce available capacities at existing landfills. Operation of the Project would not result in an increase to solid waste. The impact would be less than significant, and no further discussion is required.

- e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. The proposed Project would be constructed following all applicable laws, regulations, ordinances, and formally adopted City standards regarding solid waste disposal. Operation of the Project would not result in an increase to solid waste. The impact would be less than significant, and no further discussion is required.

4.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

Potentially Significant Impact. Palos Verdes Drive is designated by the General Plan as a disaster route (City of Rancho Palos Verdes 1975). As previously mentioned, the Project Site is designated as a Local Responsibility Area (LRA) Very High Fire Hazard Zone (VHFHSZ). For this reason, further evaluation of potential impacts from fire events is needed to determine the significance of any potential impacts and will be included in the EIR.

- b) *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

Potentially Significant Impact. The Project Site is surrounded by ridgelines and slopes, which may have the potential to contribute to exacerbating wildfire risks. Further evaluation of potential impacts from fire events is needed to determine the significance of any potential impacts and will be included in the EIR

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

Less than Significant Impact. The Project involves the control of a failing landslide area. The Project would not require the installation of infrastructure that might exacerbate fire risk. Impacts would be less than significant and no further discussion is required.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

Potentially Significant Impact. As previously mentioned, landslide areas have been mapped along the borders of the Project Site. Additionally, the Project Site is located within a Very High Fire Hazard Severity Zone. Potential impacts due to fire related flooding impacts requires further evaluation to determine the significance of any potential impacts and will be included in the EIR.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

- a) *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Potentially Significant Impact. As mentioned above, the Project would further review biological and cultural resources in the EIR. The Project may have a potentially significant effect and further evaluation is required to determine if any significant impacts would result from the Project.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects?)*

Potentially Significant Impact. As mentioned in the analysis above, further evaluation is required to state the level of significance for several impacts. In order to discuss cumulatively considerable impacts, further evaluation is required.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Potentially Significant Impact. As mentioned in the analysis above, further evaluation is required to state the level of significance for several impacts. In order to discuss substantial adverse effects on human beings, further evaluation is required.

SECTION 5.0 – REFERENCES

The following is a list of references used in the preparation of this document.

CalFire

- 2011 CalFire Fire Hazard Severity Zones Maps, Los Angeles County, Rancho Palos Verdes. Available online at: https://osfm.fire.ca.gov/media/5839/rancho_palos_verdes.pdf.

California Geological Survey

- 2010 Update of Mineral Land Classification for Portland Cement Concrete-Grade Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California, 2010 Special Report 209. Available online at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

Caltrans

- 2020 Scenic Highways. Available online at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.

City of Rancho Palos Verdes

- 1975 General Plan Land Use Map. Adopted June 26, 1975. Available online at: <http://www.rpvca.gov/DocumentCenter/View/5911/General-Plan-Land-Use-Map-adopted-1975-PDF>.
- 1978 General Plan Land Use Map Adopted December 19, 1978. Available online at: <https://www.rpvca.gov/DocumentCenter/View/5901/Coastal-Specific-Plan-Map-PDF>.
- 2012 Official Zoning Map, February 21, 2012. Available online at: <http://www.rpvca.gov/DocumentCenter/View/5912/Zoning-Map-adopted-2012-PDF>.

Department of Conservation (DOC)

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- 2020 Maps. Available online at: <https://maps.conservation.ca.gov/cgs/DataViewer/>
- 2020 California Office Tsunami Inundation Maps. Available online at: <https://www.convservation.ca.gov/cgs/tsunami/maps>.
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Department of Toxic Substances Control

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- 2020 Geotracker. Available online at:
https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603705391,
accessed August 11, 2020.
United States Fish and Wildlife (USFSW)
- 2020 National Wetlands Inventory. Available online at:
<https://www.fws.gov/wetlands/data/mapper.html>, accessed August 11, 2020.
United States Geological Survey
- 2020 U.S. Quaternary Faults. Available online at:
<https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf>, accessed August 11, 2020.

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LIST OF COMMENTERS

AGENCIES

1. United States Fish and Wildlife Service/California Department of Fish and Wildlife
2. California Department of Conservation
3. California Department of Transportation District 7
4. Native American Heritage Commission
5. Los Angeles County Sanitation Districts
6. South Coast Air Quality Management District

ORGANIZATIONS

7. Abalone Cove Landslide Abatement District
8. California Native Plant Society
9. Palos Verdes Horsemen's Association
10. Palos Verdes Peninsula Conservancy
11. Unknown

INDIVIDUALS

12. Dyda, K.
13. Feldman, Laura
14. Fotion, George
15. Gladstone, Lisa, and Owens, Milton
16. Hastings, Sheri
17. Knight, Jim
18. Park, Noel
 - a. Park, Noel - January 13, 2021
 - b. Park, Noel - December 15, 2020
 - c. Park, Noel - January 14, 2021

19. Sattler, Alfred and Barbara

20. Sunshine

- a. Sunshine – December 8, 2020
- b. Sunshine -December 8, 2020
- c. Sunshine -December 5, 2020
- d. Sunshine -November 16, 2020

21. Taylor, Joan

22. Thompson, Brian

23. Wolf, Lisa

24. Yarber, Sharon

25. Yung, Grace

26. Scoping Meeting Notes, Infrastructure Management Advisory Committee (IMAC)

27. Scoping Meeting Notes, December 19, 2020

AGENCIES

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U.S. FISH AND WILDLIFE SERVICE
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF
FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, California 92123

In Reply Refer to:
FWS-LA-21B0050-21CPA0031

January 15, 2021
Sent by Email

Ron Dragoo
City Engineer
City of Rancho Palos Verdes
Public Works Department
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275

Subject: Comments on the Notice of Preparation of an Environmental Impact Report for the Portuguese Bend Landslide Mitigation Project (SCH #2020110212)

Dear Ron Dragoo:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Notice of Preparation (NOP) dated November 12, 2020. The Wildlife Agencies have identified potential effects of this project on wildlife and sensitive habitats. The project details provided herein are based on the information provided in the NOP and associated documents.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program.

The Service recently issued a section 10 incidental take permit (permit) to the City of Rancho Palos Verdes (City) associated with the City's NCCP/HCP. The Department has not yet issued an NCCP permit to the City. The City must ensure and verify that the draft Environmental Impact Report (DEIR) for the proposed project implements all of the requirements, conditions, and applicable avoidance and minimization measures of the NCCP/HCP, associated Implementing Agreement (IA), and permit. The DEIR will need to address biological issues that are not addressed in the NCCP/HCP and IA, such as specific impacts to and mitigation requirements for

wetlands or sensitive species and habitats that are not addressed by the NCCP/HCP. Issue areas in the DEIR that may be influenced by the NCCP/HCP include “Land Use,” “Landform Alteration/Visual Quality,” “Traffic/Circulation,” “Biological Resources,” “Drainage/Urban Runoff/Water Quality,” “Noise,” and “Cumulative Effects.” In addition, the DEIR will need to describe why the proposed project, irrespective of other alternatives, is consistent with and appropriate in the context of the NCCP/HCP.

The proposed project is a Covered City Project (NCCP/HCP Section 5.2.3 - Landslide Abatement Measures) in the City’s NCCP/HCP and includes mitigation measures designed to prevent the continued movement of the 285-acre Portuguese Bend Landslide Complex (PBLC). Approximately 96 acres of the PBLC overlap with the NCCP/HCP Preserve, while the remainder of the PBLC area includes undeveloped open space as well as several residences, a recreational park, and an archery range. Landslide mitigation measures proposed by the project will be implemented in three phases: surface fracture infilling (Phase 1), surface water improvements (Phase 2), and groundwater mitigation drains (Phase 3). Surface fractures, which can be a few feet wide and up to 15 feet deep, would be filled with a fly ash-based slurry¹ in order to prevent storm runoff from easily infiltrating into the groundwater. Surface water improvements would consist of replacement and refurbishment of existing drainage pipes, the installation of a new drainage pipe below Burma Road, the installation of engineered swales, and a flow reduction area that would impact approximately 8 acres. Finally, following the completion of Phases 1 and 2, which is anticipated to take approximately 14 months, the City would construct groundwater mitigation drains (hydraugers) to help alleviate underground water pressure within the PBLC. Hydraugers would be installed using horizontal or directional drilling for up-gradient and down-gradient drains, respectively.

The undeveloped open space and NCCP/HCP Preserve areas contain suitable habitat for sensitive species as evidenced by the previous documentation of the federally threatened coastal California gnatcatcher (*Poliophtila californica californica*; gnatcatcher), aphanisma (*Aphanisma blitoides*), and South coast saltscale (*Atriplex pacifica*) in these areas (Dudek 2007; Cooper 2018; PVPLC 2020). The NOP indicates that a biological resources technical report (BTR) would be prepared to evaluate project impacts to sensitive and/or special status species, including those species that are covered by the NCCP/HCP, and that conformance to the NCCP/HCP would be required. In addition, the BTR would identify any possible impacts to riparian habitat associated with two streams that are identified in the Service’s National Wetlands Inventory.

The Wildlife Agencies offer the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with the requirements of the NCCP/HCP:

1. Within the PBLC area, the project proposes filling soil surface fractures with a fly-ash based slurry to help prevent stormwater runoff from easily becoming part of the

¹ According to the United States Department of Transportation Federal Highway Administration, [coal fly ash](#) is a fine-grained powdery material produced from the burning of pulverized coal. It is often used as a supplementary cementitious material, a mineral filler in asphalt applications, or less often, as an embankment or structural fill material.

groundwater. As part of the alternatives review of the DEIR, the Wildlife Agencies recommend the City evaluate using natural, permeable materials such as mulch and/or soil to fill the fractures, rather than the fly-ash slurry. Although limited information is provided in the NOP regarding the composition of the fly-ash slurry, it appears that use of the mixture would be similar to grouting the fractures with cement and would not allow for vegetation to reestablish in these areas. If the purpose of the filling is to prevent the rapid infiltration of stormwater through deep surface fractures, then natural materials or soil should similarly function to prevent stormwater runoff from quickly becoming part of the groundwater by slowing infiltration and forcing the runoff to move through the rooting zone. In addition, by introducing an impervious surface into a natural landscape, the fracture filling may alter surface flow patterns and lead to localized erosion around the filled fractures which may damage surrounding vegetation. If natural materials would be ineffective in sealing the fractures and reducing stormwater infiltration, then the DEIR should consider partial filling of the fractures using the proposed slurry, then filling the upper portion of the fractures with soil and overseeding with a native species seed mix local to the area, if possible. Once established, larger native shrub species have the added benefit of reducing soil moisture content through evapotranspiration which may help further stabilize the PBLC when combined with the other proposed measures.

2. Phase 2 of the project includes the installation of engineered swales and a flow reduction area that would impact approximately 8 acres, as well as other surface water improvements. The project should minimize the use of engineered swales by evaluating whether focused placement of the proposed measures within select low slope areas would sufficiently minimize stormwater infiltration associated with swales, avoiding the need to engineer the entire length of the swale(s). The flow reduction area should be sited to minimize impacts to native habitats and revegetated with appropriate native vegetation depending on the anticipated soil water content. Impacts associated with both components should be classified as permanent impacts (see Comment 4 below) since both the swales and the flow reduction area would likely require ongoing maintenance to ensure appropriate functionality.
3. Currently the NOP proposes siting a secondary staging area north of Palos Verdes Drive South (PVDS) in the eastern portion of the PBLC. Previous monitoring reports indicate this area supported a single gnatcatcher territory in 2018 (Cooper 2018). We recommend the City propose an alternative site for the secondary staging area that utilizes an existing disturbed area and avoids disturbance to gnatcatcher territories. Finally, the DEIR should include all applicable NCCP/HCP avoidance and minimization measures including the provisions of Section 5.6.9 which requires a 300-foot buffer around all active gnatcatcher nests if the breeding season cannot be avoided.
4. For the purposes of tracking impacts under the NCCP/HCP, the DEIR should quantify both anticipated temporary and permanent impacts associated with project implementation. Impacts should be classified based on vegetation type described in the NCCP/HCP. For Phase 1, all fractures that are filled with the fly-ash based mixture should be considered

permanent impacts and should be classified based on the dominant surrounding vegetation [e.g., if surrounding habitat is primarily coastal sage scrub (CSS) then the impacts should be classified as coastal sage scrub]. For Phases 2 and 3, any area that will require ongoing maintenance should be classified as permanent impacts, even if revegetated with native vegetation. All permanent impacts need to be debited from the City's allowable impacts to CSS and grassland habitats and reported in the NCCP/HCP Annual Report. Temporary impacts associated with equipment access and staging should be estimated as part of the EIR, tracked during NCCP/HCP annual reporting, and restored and monitored in accordance with Section 5.5 of the NCCP/HCP once the project is completed. Equipment access routes should be sited in the least environmentally sensitive areas and considered temporary impacts until the vegetation is restored consistent with the requirements of the NCCP/HCP. The Wildlife Agencies recommend access routes as well as all temporary staging areas be monitored as part of their recovery for the establishment of plant species that are ranked as highly invasive by the California Invasive Plant Council (Cal-IPC) and recommend those species be removed if detected.

5. The NOP references two dry streams that are identified in the Service's National Wetlands Inventory within the project area indicating potential aquatic, riparian, and wetland habitats may be present. Consistent with section 6.7 of the NCCP/HCP, as applicable, project proponents must submit an application for and receive Federal Section 404, Section 401, and state Section 1600 permits prior to impacting any jurisdictional wetlands. Applicants must also apply to the Regional Water Quality Control Board for Waste Discharge Requirements prior to any discharges, including discharges from land that may affect any waters of the state. Therefore, the DEIR should include a jurisdictional delineation of the creeks/drainages and their associated riparian habitats. The delineation should be conducted pursuant to the Service wetland definition adopted by the Department (Cowardin *et al.* 1979). Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river, stream, or lake, or use material from a river, stream, or lake, the City must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration Agreement (LSAA) is required. The Department's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the lead agency's CEQA documentation for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian

resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an LSAA.²

We appreciate the opportunity to comment on this NOP. The comments and recommendations provided are based on our knowledge of listed, sensitive, and declining vegetation communities in the City and our participation in regional conservation planning efforts. The Wildlife Agencies are available to work with the City and your consultants on the project to avoid and minimize impacts to covered species and natural communities consistent with the NCCP/HCP. We look forward to further coordination with the City in implementing the NCCP/HCP and in ensuring the protection for the biological resources in the City. If you have questions or comments regarding this letter, please contact [Eric Porter](#)³ of the Service at 760-431-9440, extension 285, or [Kyle Rice](#)⁴ of the Department at 858-467-4250.

Sincerely,

**JONATHAN
SNYDER**

Jonathan D. Snyder
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Digitally signed by
JONATHAN SNYDER
Date: 2021.01.14 17:01:33
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David A. Mayer
Environmental Program Manager
California Department of Fish and Wildlife

cc:

Karen Drewe, San Diego – Karen.Drewe@wildlife.ca.gov
Jennifer Ludovissy, San Diego – Jennifer.Ludovissy@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQACOMMENTLETTERS@wildlife.ca.gov
State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov
Adrienne Mohan (Palos Verdes Peninsula Land Conservancy) – amohan@pvplc.org

² A [notification package](#) for a LSAA may be obtained by accessing the Department's web site.

³ Eric.Porter@fws.gov

⁴ kyle.rice@wildlife.ca.gov

LITERATURE CITED

- [Cooper] Cooper Ecological Monitoring, Inc. 2018. Palos Verdes Nature Preserve Survey for the California gnatcatcher and the Cactus Wren, 2018 Final Report. Prepared for the Palos Verdes Peninsula Land Conservancy, Submitted August 9, 2018.
- Cowardin, L.M., V. Carter, F.C. Golet, and E.T. LaRue. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.
- Dudek. 2007. Preserve Habitat Management Plan for the Portuguese Bend Nature Preserve. Prepared for: The City of Rancho Palos Verdes. Prepared by: Palos Verdes Peninsula Land Conservancy, Rolling Hills Estates, CA and Dudek, Encinitas, CA. 67 pp. + Appendices.
- [PVPLC] Palos Verdes Peninsula Land Conservancy. 2020. Comprehensive Management and Monitoring Report 2016-2018 for the Rancho Palos Verdes draft Natural Communities Conservation Plan and Habitat Conservation Plan. Submitted May 2020.



Environmental Setting, GeoSoils, Alternatives

Mr. Ron Dragoo
City Engineer
Public Works Department
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275-5391

January 12, 2021

**Subject: Comments on the scope and content of the NOP for the Portuguese Bend Landslide Mitigation Project, City of Rancho Palos Verdes, California
SCH# 2020110212**

Dear Mr. Dragoo:

The California Geological Survey (CGS) received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Portuguese Bend Landslide Mitigation Project (PBLMP) in the City of Rancho Palos Verdes, California. This letter conveys suggestions and recommendations from CGS concerning the geologic and seismic issues for the PBLMP from our review of the NOP and the project summary report prepared by Chambers Group, Inc., dated November 2020.

CGS recommends the EIR address the following items and issues relating to the PBLMP project:

1) Regional and Site-Specific Geology

The Chambers report does not provide a discussion of the regional or site-specific geology, nor does it discuss how the geology influences the landslide hazard identified at this site. The EIR should include a discussion of the geology and geologic structure underlying the PBLMP, including a description of rock types and a thorough characterization of the Portuguese Bend Landslide Complex. This characterization should include an accurate determination of the landslide limits and failure surface geometry, identification of the rupture surface, and strength of the basal failure material and internal landslide mass. With respect to groundwater, the EIR should discuss current levels, historic fluctuations, and sources of surface water infiltration and subsurface recharge. Additionally, the EIR should include geologic cross sections depicting the geology, bedrock structure, landslide geometry, groundwater level(s), failure plane(s), surface fractures, and proposed hydrauger locations and depths. Lastly, the Chambers report states the hydraugers will be installed beneath "the active movement zone of the landslide." Therefore, the EIR should discuss how the "active movement zone" is defined.

At a minimum, the following geologic maps and reports should be considered:

Dibblee, T.W., Ehrenspeck, H.E., Ehlig, P.L., and Bartlett, W.L., 1999, Geologic map of the Palos Verdes Peninsula and vicinity, Redondo Beach, Torrance, and San Pedro quadrangles, Los Angeles County, California: Dibblee Geological Foundation, Dibblee Foundation Map DF-70, scale 1:24,000.

Haydon, W.D., 2007, Landslide Inventory Map of the Palos Verde Peninsula, Los Angeles County, California: California Geological Survey, scale 1:24,000.

Vonder Linden, K., 1989, "The Portuguese Bend Landslide", Engineering Geology, Volume 27, Issues 1-4, Pages 301-373.

Woodring, W.P., Bramlette, M.N., and Kew, W.S.W., 1946, Geology and paleontology of Palos Verdes Hills, California: U.S. Geological Survey, Professional Paper 207, scale 1:24,000.

2) Geologic and Seismic Hazards

Numerous potential geologic hazards exist within the PBLMP project area. Each of the hazards listed below should be addressed in the EIR.

a. *Landslide Hazards*

Gravitational landsliding is obviously identified at this site; however, the project is located in a Zone of Required Investigation for "earthquake-induced landslides" established by CGS. This additional landslide triggering mechanism should be discussed in the EIR with respect to the effectiveness of the proposed mitigation measures. At a minimum, the following reports should be reviewed for this specific evaluation:

California Geological Survey, 2008, Guidelines for Evaluating and Mitigating Seismic Hazards in California, CGS Special Publication 117A, 81 p.

Blake, T.F., 2002, Recommended Procedures for Implementation of DMG Special Publication 117 Guidelines for Evaluating and Mitigating Seismic Hazards in California, Southern California Earthquake Center, 132 p.

b. *Ground Shaking Hazards*

The Chambers report states there is "No Impact" from strong seismic ground shaking because no structures are planned. While no new structures are planned for the PBLMP, earthquake shaking is still a concern as a driving force that can trigger landslides, which are otherwise stable under static conditions. The EIR should discuss the ground motion hazard analysis used to derive appropriate seismic input parameters for dynamic (i.e., pseudostatic) slope stability analysis.

3) Mitigation Effectiveness

The PBLMP involves a proposed three-phased approach with a stated goal to "control the existing landslide area." The anticipated phases are (in order): surface fracture in-filling, surface water improvements, and groundwater mitigation improvements. While CGS cannot comment on the adequacy of these mitigation measures, the EIR should discuss how the effectiveness of this mitigation design will be determined and how the mitigation efficacy will be verified after construction.

Portuguese Bend Landslide Mitigation Project Review Comments
City of Rancho Palos Verdes, California SCH# 2020110212

January 12, 2021

Please let me know if you have any questions or concerns with the comments in this letter.

Sincerely,

DocuSigned by:

Brian Olson

6A11523597274DF...

Brian Olson

Engineering Geologist, PG#7923, CEG #2429

California Geological Survey

320 W. 4th Street, Suite 850

Los Angeles, CA 90013

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Brian.Olson@conservation.ca.gov

DocuSigned by:

Jeremy Lancaster

41D79F9BCB8A40E...

Jeremy Lancaster

Supervising Engineering Geologist, PG #7692, CEG #2379

California Geological Survey

801 K Street, MS 12-31, Sacramento, CA 95814

916-204-1710

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DEPARTMENT OF TRANSPORTATION

DISTRICT 7

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December 9, 2020

Mr. Ron Dragoo, City Engineer
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275-5391

RE: Portuguese Bend Landslide Mitigation
Vic. LA-213 PM 0.266
SCH # 2020110212
GTS # LA-2020-03421AL-NOP

Dear Mr. Dragoo:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Portuguese Bend Landslide Mitigation Project (Project) would control the existing landslide area. The proposed Project involves a series of recommended mitigation measures which follow a phased-approach to construction and installation. The construction is likely to be implemented in stages, which may occur separately. The anticipated construction phasing as follows: (i) surface fracture infilling; (ii) surface water improvements; and (iii) groundwater mitigation improvements. Periodic field observation should be performed during construction under the supervision of the appropriate California registered Engineer. Post-construction items are anticipated to include long-term maintenance, landslide monitoring, and possible future construction phases.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient

modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in July 2020.

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

For future development TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03421AL-NOP.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse



NATIVE AMERICAN HERITAGE COMMISSION

November 16, 2020

Ron Dragoo
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275

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NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2020110212, Portuguese Band Landslide Mitigation Project, Los Angeles County

Dear Mr. Dragoo:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse



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December 15, 2020

Ref. DOC 5972522

Mr. Ron Dragoo, City Engineer
Public Works Department
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, CA 90275-5391

Dear Mr. Dragoo:

NOP Response for Portuguese Bend Landslide Mitigation Project

The Los Angeles County Sanitation Districts (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on November 11. The proposed project is located within the jurisdictional boundary of District No. 5. We offer the following comments:

1. Sections of the proposed project may impact existing and/or proposed Districts' facilities (e.g. trunk sewers, recycled waterlines, etc.) over which it will be constructed. Districts' facilities are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of, the proposed project until project plans and specification that incorporate Districts' facilities are submitted for our review. To obtain copies of as-built drawings of the Districts' facilities within the project limits, please contact the Districts' Engineering Counter at engineeringcounter@lacsd.org or (562) 908-4288, extension 1205. When project plans that incorporate our facilities have been prepared, please submit copies of the same to the Engineering Counter for our review and comment.
2. The Districts maintain sewerage facilities within the project area that may be affected by the proposed project. Approval to construct improvements within a Districts' sewer easement and/or over or near a Districts' sewer is required before construction may begin. For a copy of the Districts' buildover procedures and requirements go to www.lacsd.org, under Services, then Wastewater Program and Permits and select Buildover Procedures. For more specific information regarding the buildover procedure, please contact Ms. Danielle Thomas at (562) 908-4288, extension 2754.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717 or at araza@lacsd.org.

Very truly yours,

A handwritten signature in black ink, appearing to read "Adriana Raza".

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Howard
R. Paracuelles
D. Thomas
Engineering Counter

SENT VIA E-MAIL:

January 7, 2021

publicworks@rpvca.gov

Ron Dragoo, City Engineer
City of Rancho Palos Verdes, Public Works Department
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275

**Notice of Preparation of an Environmental Impact Report for the
Portuguese Bend Landslide Mitigation Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁷.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
LAC201117-07
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

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ORGANIZATIONS

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**Abalone Cove Landslide Abatement District
P.O. Box 4351
Palos Verdes Peninsula, CA 90274**

**COMMENTS ON PORTUGUESE BEND LANDSLIDE MITIGATION PROJECT
RANCHO PALOS VERDES, CALIFORNIA**

Abalone Cove Landslide Abatement District (“ACLAD”) submits the following comments on the Portuguese Bend Landslide Mitigation Project prepared by Chambers Group, Inc., dated November 2020, (“Project”) prepared for the City of Rancho Palos Verdes, California (“City”).

Prior to City taking further action with this Project, ACLAD is requesting the following:

1. As stated in the Initial Study, the Portuguese Bend Landslide Complex (“PBLC”) area is made up of a series of smaller landslides of which include the Abalone Cove Landslide Area (ACLA). ACLAD was formed to mitigate this landslide and is formally requesting mitigation efforts for the ACL be included in this EIR.
2. The Project should address all impacts to the ACLA including redirection of hydrologic flows arising from the Project and its construction as well as mitigations to underground water recharge including Altamira Canyon.
3. The RPV City Council in 2012 adopted Goals and Priorities to address land stability issues in the ACLA. The Project EIR must acknowledge this Council resolution and include all relevant geological studies undertaken by the City including, but not limited to, the Altamira Canyon Control Project and the study done by Harris and Associates.
4. Private land owners in the ACLAD area have contributed a substantial sum of revenue to help mitigate land movement in the ACLA. These efforts have no doubt helped reduce impacts to the sewer system as well as road damage along PVDS lessening the financial impact of the City. In order to further the Project goals stated in Sec. 1.1, ACLAD is requesting that the City include the ACLA in this EIR to help mitigate these private fiscal impacts as well impacts to infrastructure in this area.
5. The City should determine whether this Project is the most cost-effective project to address all such common issues.

These comments are respectively submitted, and approved by, the ACLAD Board of Directors. ACLAD will make available any of its records to the consultants to help further the accuracy of this EIR.

Tim Kelly, Chairman
ACLAD Board of Directors
January 15, 2021

California Native Plant Society

South Coast Chapter

January 11, 2021

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) pursuant to the Requirements of the California Environmental Quality Act (CEQA) for the Portuguese Bend Landslide Mitigation Project

Dear Honorable Mayor, Members of the City Council and City Staff,

The South Coast California Native Plant Society (SCCNPS) chapter would like to thank you for the opportunity to comment on subject Notice of Preparation (NOP).

SCCNPS recognizes the considerable effort the city of Rancho Palos Verdes has undergone to reduce the impact of the Portuguese Bend Landslide Complex (PBLC) to Palos Verdes Drive South (PVDS), a major traffic artery, and to sewer services for the residents located in the PBLC.

The proposed Portuguese Bend Landslide Mitigation Project (Project) covering three construction and installation phases raises concerns that will impact the coastal sage scrub ecosystem. This ecosystem provides considerable aesthetic value to the Palos Verdes Peninsula while delivering environmental value to endangered species that cannot be replaced. The area also is a part of the Pacific Flyway and would impact the area's contribution to migration path. The SCCNPS considers the PBLC as the largest example of existing California native plants within the South Coast chapter and want to express concerns regarding the proposed Project and its impacts.

Below are the major areas of concern:

1) Proposed construction activities

Site preparation activities would require access paths, working platforms, staging areas, mowing, fencing and grading. The activities will be damaging and destroying California native plants and the value they bring to the local wildlife species, including those endangered species, that occupy the habitat.

2) Surface Fracture Infilling

The choice of material (cement and fly-ash) eliminates the growth of vegetation and creates bands of cement thereby limiting valuable vegetation, habitat and aesthetic value of the Palos Verdes Preserve. The fissures' lack of a test plan to confirm the beneficial impact to the natural groundwater condition and the environmental impact without measurable benefits is a concern.

The scope of the infilling is not limited to the 1600 cubic yards of infilling as an estimate of vegetation to be damaged and destroyed to complete the infilling portion of the project would need to be calculated. The use of fly-ash has a considerable potential for introducing toxic elements into the soil and water further impacting the habitat occupants, both plant and animal. Alternative materials conducive to plant growth should be explored including use of local, natural material once the prototype test confirms the benefits of the fracture infilling.



Dedicated to the preservation of California native flora

3) Surface water improvements

The consequence of changing the streambeds and related alluvial fans will diminish the soil-water zone, changing the growth and viability of the native plants and the non-native species and potentially create larger areas void of vegetation. This would impact the ecosystem, endangered species and further reduce the aesthetic value of the area.

Natural groundwater conditions are highlighted as one of factors contributing to the landslide. The native plants in the canyons contribute to the stabilization of the land as the plants absorb stormwater runoff and eliminate or slow considerably the percolation to the lower layers. The native plant root systems serve two main purposes:

1. Deep root systems reaching 40 to 90 feet in depth stabilize the slopes:
 - Both the Toyon and the Lemonade Berry are effective deep root native plants as demonstrated during the prior well digging operations.
 - Over 13 plant species are known for their bank stabilization capabilities and are identified as native to PBLC area.
2. Spreading surface root systems absorb the stormwater creating a barrier to the lower layers:
 - Coastal sagebrush, bush sunflower, prickly-pear cactus and many others are very well adapted to the area and are effective surface root system native plants.
 - Many California native plant species are compatible with the PBLC area and can be utilized to absorb stormwater while bringing aesthetic value.

Where mitigation of vegetation is called for, the use of locally sourced seed and plant material should be used.

4) Flow Reduction Area

Creation of an 8-acre area that would be inconsistent with the surrounding area raises a concern that the introduction of an open area without the benefit of planting and habitat creation will introduce use inconsistent with the current usage. In addition, it does not take advantage of the ground water percolation benefits of native plants.

5) Hydrauger

As raised in the Infrastructure Management Advisory Committee (IMAC) Landflow report, the implementation of hydraugers as part of the groundwater is key. A pilot program that demonstrates the benefits and impacts of the hydrauger use should strongly be considered. This would provide PVPLC and SCCNPS access to contribute to the solutions to reduce the impact.

6) Mitigation and Maintenance

The Project described will create considerable damage to the existing habitat and will impact the future native plant habitat growth. The Project should clearly outline what optional approaches could be pursued to reduce impacts, what mitigation steps are included in the project plan and timeline and address additional issues raised as part of the EIR process.

Thank you for your consideration of these concerns and look forward to the EIR process and further definition of the scope of Project including detailed locations and dimensions so that we can understand in greater detail the impacts to native habitat. We strongly recommend a phased and pilot approach to improve the benefits, the outcomes and mitigation approaches to preserve and ensure the aesthetic and environmental richness of the PBLC.



Dedicated to the preservation of California native flora

Sincerely,



David Berman
President, South Coast Chapter
California Native Plant Society



Dedicated to the preservation of California native flora



December 14, 2020

Subject: Comments re: NOP for Portuguese Bend Landslide Mitigation EIR

City of Rancho Palos Verde Public Works Department
Attn: Mr. Ron Dragoo, City Engineer (publicworks@rpvca.gov)
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391

Dear Mr. Dragoo:

It is encouraging to see that the report by the Chambers Group recognizes that impacts to recreational opportunities need to be addressed in the upcoming EIR, including the effect that the proposed project will have on trails within the Preserve.

On behalf of the Palos Verdes Peninsula Horsemen's Association we would like to request that temporary interruptions in trail use by equestrians be minimized to the fullest extent possible and that damage to any and all trails, regardless of whether or not they are designated for use by equestrians, be promptly repaired such that the trails are, at a minimum, restored to their prior condition. Ideally, trails in need of repair or restoration should be improved from their pre-project condition. It is consistent with the Trails Network Plan that when projects are undertaken that provide opportunities for enhancement of trails, that the City avail itself of such opportunities. Please take advantage of this opportunity to make much needed improvements to the conditions of the trails in the Preserve.

We also ask that the DEIR address with specificity what impact, if any, the project will have on (i) connectivity between trails within the trail network, and (ii) the classification or potential reclassification of trail use. We are concerned that if horses must traverse open culverts and swales to go from one trail to another that such placement of the culverts and swales will impede connectivity and dramatically reduce the recreational opportunities for equestrians. We are also concerned that trails where equestrians are currently permitted to ride will be altered in a manner that will render them no longer appropriate for being classified as equestrian use trails. While the number of trails in total may not change, we want assurance that the number of equestrian approved trails will not change.

Thank you for your consideration.

Very truly yours,

PALOS VERDES PENINSULA HORSEMENS' ASSOCIATION, a California not for profit corporation

By: Charlene O'Neil
Charlene O'Neil, President

cc: RPV City Council (cc@rpvca.gov)



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

January 15, 2021

Subject: Palos Verdes Peninsula Land Conservancy's comments on the Notice of Preparation of an Environmental Impact Report for the Portuguese Bend Landslide Mitigation Project

Dear Honorable Mayor, Members of the City Council and City Staff,

Thank you for the opportunity to provide input into the scoping of the Portuguese Bend Landslide Mitigation project Environmental Impact Report (EIR). The Land Conservancy underscores that critical species habitat conservation remain a priority factor when evaluating and determining the preferred alternatives for the landslide mitigation measures. We offer the following global and specific comments.

Global Comments:

1. Per the NCCP/HCP, the EIR should evaluate the temporary construction as well as permanent impacts to habitat and trails that may be caused by the various landslide mitigation strategies. Temporary impacts will require replacement of native habitat (as mature as possible) in situ to restore areas to their original condition.
2. All construction activities and permanent habitat impacts must follow NCCP/HCP minimization measures and environmental considerations. This includes avoiding impacts to native plants and covered species to the maximum extent possible.
3. The EIR should evaluate impacts to recreation and trail accessibility, and maintain current trail routes to the maximum extent possible. If trails must be closed or rerouted to accommodate any of the measures under evaluation, then the impacts of constructing new trail segments should also be evaluated in the EIR.
4. Staging areas should be adjusted to occupy open space with no vegetation or habitat. Currently, the location of the secondary staging area in the sandbox area is situated over quality native habitat, and could be relocated to an area that is already void of native plant habitat, such as the gravel parking area north of PV Drive South or graded areas south of PV Drive South. Reviewing alternative locations that reduce impact to native habitat to the best extent possible would follow the NCCP/HCP Minimization Measures.
5. It is also important to correct figures and text that mislabel the lands as "Conservancy" areas throughout the report. These lands are owned by the City and are named the Palos Verdes Nature Preserve (of which Portuguese Bend and Abalone Cove are Reserve subareas). In the EIR, please revise the names of the lands as "Nature Preserve".

Fracture Filling:

6. Fracture filling should also evaluate the use of alternative materials that are natural like soil (in addition to evaluating the environmental impacts of using fly ash).

7. We suggest that only fissures which are located within the pathway of streamflow should be filled. It could be assumed that fissures located in areas higher in elevation and away from streambeds may not require filling to prevent percolation to the bentonite layer since they may only become exposed to minimal rainwater. Minimizing the amount of fissures that require filling will minimize impacts to vegetation and aesthetics. However, it must also be assumed that new fissures could develop after the initial filling phase is complete. Therefore the EIR should take thorough inventory of all current fissures and make some assumptions about the creation of new fissures in order to thoroughly evaluate the impacts to vegetation and aesthetics.

Surface Water Improvements:

8. We are concerned about the impacts to aesthetics and biological resources that may be caused by the construction of the Flow Reduction Area. This landslide mitigation measure will likely result in the proliferation of non-native plants or otherwise presumably be void of vegetation and dry most of the year, particularly if maintenance on a regular basis is required. It should be assumed that this area may be misused by off-trail recreation, creating dust and impacts to any adjacent vegetation. It would be ideal to explore the possibility of including native planting to increase habitat value, reduce dust, and improve aesthetics to ameliorate concerns regarding a barren landscape and discourage off-trail recreation. Native plants suitable for the area should be chosen in consultation with the Land Conservancy and sourced from local plant genetics.

9. Members of the community familiar with the drainage history of Portuguese Bend Canyon and Paintbrush Canyon upstream of Burma Road have described the impoundment area as a “clogged drain” that once flowed under the road. We suggest that clearing the culverts and removing obstacles to the drainage be reprioritized in order to keep water flowing through the canyon and reducing percolation. This task would cause less impact to biological resources than the measures to line the canyons with geotextile or impermeable materials.

10. Engineered swales with impermeable subsurface materials would not support revegetation of appropriate native species which have deep roots (some roots recorded as long as 90 feet). Locally-sourced annual species with short roots would have to be used instead but may not provide equitable mitigation for removed mature species. Furthermore, it is likely the surrounding landscape vegetation will suffer from reduced access to the seasonal streamflow that spreads out across the watershed and alluvial fans at the bottom of the canyon areas should they be channelized. Adverse consequences to surrounding vegetation could be exacerbated by drought stressors resulting in die-off, invasion of non-native plants, and increased fire risk. The EIR should evaluate impacts to vegetation in these watersheds that would not only face direct construction impacts, but vegetation that would suffer as a result of reduced access to diverted surface water.

Hydraugers:

11. We support the recommendation of the Infrastructure Management Advisory Committee's analysis to reorder the phases of the mitigation measures to implement the Hydraugers first and evaluate the efficiency of that measure before implementing the more impactful surface water improvement

measures. The Surface Water Improvements currently identified as Phase 2 should be last (if necessary at all), since it causes the most impact to preserve's biological resources, recreation, and aesthetics. Based on comments from the community, this phase presents the most public concern.

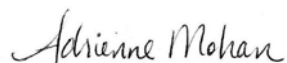
12. The Hydraulics appears to have the least impact to the land and vegetation. Through the environmental review process, we urge the full construction impact area be evaluated including truck/machine access routes, staging areas, soil stockpile locations, etc.

13. According to Figure 7, the location of Hydraulics A5 and A6 are located in the tidal zone along the beach. These locations are particularly important and sensitive locations for shorebirds and sea mammals. Furthermore, the construction impacts may be significant along the coastal bluff areas in order to initially install as well as routinely maintain the Hydraulics in these two locations. The Chambers report states there are no impacts to rock outcroppings, but we challenge that notion since both hydrauger locations straddle the significant Inspiration Point promontory. We suggest evaluating alternative locations for these hydraulics/drains to locations along PV Drive South where accessibility will be more convenient and less impactful to the soils, vegetation and recreational trails.

14. The White Point Landslide is referenced as a successful hydrauger project. Although a totally different landslide with a different urbanized watershed, the City of Los Angeles has seen success in using only hydraulics to bring this landslide mitigation project to the point of planning to reconnect the road. This case study underscores the argument for reordering the phases.

We continue to advocate for a re-ordered phased approach with monitoring and adaptive modifications to the designs and implementation of subsequent elements, with the goal to minimize impacts to surface topography, native vegetation and availability of surface water that supports the local ecosystem, as well as the existing public trails network. Thank you for your consideration.

Sincerely,



Adrienne Mohan
Executive Director

cc:

David Mayer and Kyle Rice, California Department of Fish and Wildlife
Marybeth Woulfe and Eric Porter, US Fish and Wildlife Service

**Questions Following Up to the Rancho Palos Verdes City Council Meeting of
1/16/18 Re: Draft Portuguese Bend Landslide Feasibility Study**

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Legend

CC=Rancho Palos Verdes City Council

CSS=Coastal Sage Scrub

City=City of Rancho Palos Verdes

FS=Feasibility Study Update Draft of 12/22/17

NCCP=Natural Communities Conservation Plan

PBLC=Portuguese Bend Landslide Complex

PBR=Portuguese Bend Reserve

PVDS=Palos Verdes Dr. South

RPV=City of Rancho Palos Verdes

SR=RPV Staff Report for CC meeting of 1/16/18

"Solution"-Specific Questions

1. Which of the project proposals being floated in the FS present the greatest risk of triggering another landslide during construction? Is it not the case that 1950s infill done in the PBLC area is thought to have been, at minimum, a contributing factor to the 1956 landslide? How much new fill would be involved in the different project proposals?
2. Mr. Cullen explained that the typical gradients they work on are 0.01 to 0.00001. The area under consideration has a 0.10 or 10% grade. What hazards could be expected working with such steep terrain?
3. Have homes in Rolling Hills located near these three canyons been examined for risk of de-stabilization if the project proceeds?
4. Are there flexible materials now available that could be substituted for existing materials used on 1) the road, 2) the sewer pipe along PVDS, 3) the extraction and monitoring wells, 4) the corrugated pipe installed in past years to channel water in the lower reaches toward the ocean, in each case which would reduce the likelihood of them being torn apart by land movement?
5. If septic tanks account for a certain percentage of the groundwater and septic tank conversion is the proposal with the least impact on nature, then will that be prioritized first?
6. Would pipes from a centralized sewer system in Rolling Hills be routed to avoid the Preserve?
7. Why not give full effort to dewatering instead of installing such systems and then letting them go? If it worked for Abalone Cove, if it worked for PBR in the past, why not try it ahead of other solutions? Even if the wells shear over time, would it not be cheaper and less invasive to drill them again and over time they should stop shearing as land movement slows?
8. What subsurface water (amount and percentage) would the proposed "horizontal" drains be expected to drain and what water would not be expected to be drained by them? What would happen to the water that would not be expected to drain?
9. Is there a certain amount of water or percentage of water saturation that would be expected to have a nominal effect on land movement and therefore would be acceptable under the proposed solutions?

10. How will dewatering wells function with the horizontal drains? Will drainage be tunneled or established under PVDS? How will the tunneling and drains under the road affect the long-term stability of the road when the land does move?
11. From the plan view of the placement of the horizontal drains (FS Figure 14), it is not clear what subsurface water levels the horizontal drains could passively drain. (An elevation view would be useful.) Furthermore, portions of the rupture surface appear to be at a zero-elevation contour line (Geotechnical Figure 3). This would imply that the horizontal drains will not drain water passively from this area. Please clarify.
12. Where has the sealing of surface fractures with cement been done previously in an area with similar land movement?
13. What will happen to the clumps of concrete filling the fissures when/if the land moves?
14. The consultants' presentation to CC (at about 2:32) indicates that the fill substance for the fissures doesn't have to be cement, it could be soil. Is there soil in some places in the City land south of the Preserve that has been deposited by man during prior remediation attempts, that could be used as fill for the fissures or are the consultants talking about introducing foreign soil? If the latter, does that have any risks associated with it? Related, foreign soil was brought in to re-grade Peppertree Tr. after last year's rains. Are there any risks associated with that?
15. Explain the differences between the Work Areas Conceptual Design vs. the Drainage Routing graphics. The former shows the Portuguese Cyn Channel extending past the Central Channel to PVDS and the ocean discharge, whereas the Drainage Routing graphic shows drainage for Portuguese Cyn being routed to the Central Channel only.
16. Where has the geo-textile fabric lining and channelization of canyons been done previously in an area with similar features as in PBR?
17. What would the installation process be for geo-textiles where canyon walls are deep or steep-sided?
18. How much flex is there in the geo-textile fabric proposed to line the canyons and other proposed channels, i.e., when the land moves one foot, what happens to that fabric? Two feet?

19. Will plant roots perforate the geo-textile fabric, or work through seams or overlaps, and in doing so impact the fabric's effectiveness?
20. If, over time, the geo-textile fabric tears or separates, does the work need to be redone? How would someone even know?
21. The FS at p. 53 says that "some engineering components would also be needed in mid-canyon high flow or flow convergence areas such as velocity dissipation structures, flow control channeling" What are these additional engineering components? Are any of those engineering components to be made of concrete? And approximately what dimensions are they likely to be? How would they be installed?
22. What "stream restoration program" is contemplated in the reference on p. 63 of the FS?
23. How do the consultants envision getting construction equipment and hauling equipment to and from each of the canyons they propose to channelize?
24. If 65 feet is the minimum width of the canyon lining and channelization is based on a 100-year flood event (per the SR), what is the maximum width that will be permitted/required?
25. How much work area is needed adjacent to the geo-textile project to support the work? How much staging area is needed for the geo-textile work? How much area is needed for spoils from the geo-textile work?
26. How do consultants propose to create a 65 foot-wide channel down each of these canyons which, in some places are currently 5-10 feet wide but have steep sides--will the canyons be filled in places in order to widen them?
27. Explain further how planting is proposed in the rip rap and, in particular, how the sacs would support large native plants with deep roots.
28. How do consultants propose to analyze the trade-offs between removing vegetation with deep root systems that help to control erosion in order to channelize the canyons vs. retaining that vegetation to control erosion and allowing water to flow through the canyons naturally?
29. Doesn't the central channel operate at cross purpose to the goal of sending the water down the canyons to the ocean as quickly and directly as possible?
30. Why does the central channel send most of the water, including water from Portuguese Cyn, into the area of suspected subterranean pooled water, already deemed by the consultants to be a major problem area?

31. The CC presentation by the consultants (at about 2:28) indicates that Portuguese Cyn pretty much flows to the ocean. The pipe going under PVDS has apparently sunk some. How does the consultant justify altering the canyon to the extreme extent proposed if it is functioning fairly well currently except at the point where it reaches PVDS?

Cost-Related Questions

1. Provide a breakdown of the spend on PVDS, sewer and other expenses since the City's incorporation in 1973. What was the money spent on, and what jurisdiction/agency spent it?
2. What would it cost and how long would it take to implement the measures of 1984, which seemed to be fairly effective and with significantly lighter environmental impacts than those currently proposed in the FS? What would it cost to properly maintain them, both monetarily and environmentally?
3. Per Mr. Cullen, ground water wells are critical to understanding the geology and hydrology of the landscape. Over the past years, money has been invested in placement of some 20 water wells, probably more, but the data is lacking. The fact that money was spent on water wells and then not monitored or kept in repair does not give taxpayers confidence that this project will be successful or be monitored and maintained. Why should taxpayers believe that this time will be any different?
4. The consultants indicate that "a handful" of data would be needed before designing a system, yet the data gaps seem to be extensive. Please separate the data gap costs from the pilot testing costs provided in the slide near the end of the consultants' presentation "Order of Magnitude Costs".
5. Regarding pilot testing, at what point would the determination be made that the plan isn't working and it should be scrapped, vs. it should be modified at X cost? Is the idea to go forward at all costs once we start down that road?
6. The FS says at p. 72 that "ultimately, additional areas in the adjacent watersheds could also be lined, such as Eastern Altamira Cyn or Lower Klondike Cyn where stormwater continues to infiltrate to groundwater in the vicinity of the project area." What are the projected additional monetary and environmental costs of these measures and how and when will the consultants determine whether they are "necessary"?

7. Will RPV pay for updated biologic surveys and how much will that add to the cost?
8. Do the costs of the project take into account the costs for work in Rolling Hills?
9. Do the costs of the project take into account all environmental mitigation, including for Rolling Hills?
10. Will RPV pay for Rolling Hills septic to be converted to sewer?
11. If public debt is proposed for any of the project costs, whether in RPV or Rolling Hills, will a public vote be required? What happens if the public debt is not approved? Are the costs of such an election included in the project costs?
12. What would be estimated to be the interest costs of any public debt required to fund the project? Provide backup documentation for the calculation of probable interest costs.
13. If the canyon channelization and lining go forward, will RPV compensate donors who have given their hard-earned money trusting that the land would be protected and preserved in perpetuity?
14. Has exposure to liability to homeowners, including homeowners in Rolling Hills, been taken into consideration if the project triggers slope failure?
15. When will the public see a rigorous return-on-investment analysis?

Hydrology- and Geology-Related Questions

1. Why did the FS not include a "complete characterization of the hydrology of the area", since this was a top priority of the public who attended the Landslide Subcommittee meetings?
2. How will the consultants address the data gaps, specifically addressing data from existing wells, piezometers in the streams, rainfall gauges, and multiple years of data?
3. What are the highest-priority data needs to determine the most feasible, cost effective, and least-damaging solutions?
4. What is the risk of failure of each proposed remediation solution if a full hydrologic study of the watershed is not conducted and the existing data gaps are not addressed?

5. Some of the existing landslide abatement infrastructure is in complete disrepair, some is simply not maintained. For example, this culvert between Burma Rd and Rim Tr. has overgrown vegetation blocking water flow.



It seems that if the damaged infrastructure is not repaired, hydrologic data may be skewed as water runoff and pooling is affected, thus it makes sense to postpone any future hydrologic studies until the existing damaged infrastructure is cleaned up and repaired or replaced. Has the existing infrastructure been surveyed to determine what is repairable and what isn't? Considering how long it will take to complete the projects currently contemplated in the FS, doesn't it make sense to fix what we have at least in the short term?

6. Is it possible to predict (and with what degree of certainty) where the land will flow in the future based on how much and where water will infiltrate the ground?
7. How much water is too much in the watershed? In other words, how much would need to be removed under certain rainfall conditions? And how much is needed to support life in the watershed?
8. Leighton estimated up to 77 acre-feet per year recharge from upslope irrigation. Mr. Cullen said that this is significant and needs further quantification to support a PBLC design. What sources of water are subsumed in "upslope irrigation"? What is the current percentage of groundwater inflow into the PBLC resulting from such irrigation upslope? What percentage is from septic tanks?

9. Is there a correlation between the changes in groundwater elevation from well to well and the land movement measurements from one well location to another?
10. Without the results from a hydrologic study for the watershed, that includes data specific to each canyon, what evidence is there to support the statement (in the PBLC Physical Characteristics slide presented by consultants at the CC meeting) that "infiltration of canyon runoff is a source of groundwater recharge" other than the infiltration once that runoff arrives at the lower reaches of PBR? In other words, where is the evidence that any subsurface water flow originating from water running down through the upper canyons has any significant impact on groundwater recharge in the lower reaches of PBR?
11. The consultants' presentation to CC indicated that "100% of storm water from [Paintbrush and Portuguese] canyon flows directly into the head of PBLC." Yet, some of that water currently percolates into the ground and transpires through vegetation in the canyons. Confirm that actually more water from the canyons will flow directly into the head of PBLC with lining and channelization and that actually what is done with the water that comes out of the canyons is going to determine whether or not the water flows into the head of the PBLC or is diverted elsewhere.
12. Explain the "deep" water bearing zone.
13. In the CC presentation, the consultants indicate ponding in the head of the slide, but the arrow is moving around broadly. Where is the ponding? Is this reference different than the depression in the failure surface? Does the failure surface that drops to sea level extend under PVDS?
14. Where is the depression in the failure surface relative to the one spot that showed 8 feet/year land movement?
15. What is the suspected relationship between the depression in the failure surface and the one spot in the vicinity that showed 8 feet/year land movement?
16. Regarding the Hydrogeology slide shown by the consultants at the CC meeting of 1/16/18 indicating that PBLC water enters the subsurface by different means, what amount of water entry is attributable to each of the different means?

17. In the consultants' slide labeled Detailed Analysis--Geotechnical Modeling, the landslide mass is pulled off revealing a brown layer, but it appears that part of the landslide mass is left behind in the area of the pond/the deeper landslide. Is that correct? (about 2:16 on CC video) If the modeling left behind the pond, can it be accurate modeling?
18. How is the variation in land movement explained (1-2 feet in most areas versus 8 feet in one place)? And what is the consultants' proposal for addressing this in particular; for focusing on this area?
19. Land movement data presented was just for 1 year. What is the movement for other years? And where?

Nature-Related Questions

1. Are Portuguese Cyn, Ishibashi Cyn, Paintbrush Cyn and Klondike Cyn all blue-line streams?
2. Why did the FS not include a complete assessment of the environmental impacts of the proposal, since this was a top priority of the public who attended the Landslide Subcommittee meetings?
3. As you look out over PBR from above, you see that much of the CSS cover occurs in the canyons.



Portuguese Cyn



Ishibashi Cyn



Paintbrush Cyn

This makes sense, because the higher flat lands were the lands that were farmed in years past, while the canyons were left in their natural state,

- except for damming created by roads across them. How viable is a preserve for CSS-reliant species if the very highest quality CSS is removed?
4. Is there any plan going forward to assess the impact that destroying prime wildlife habitat in these canyons will have on the survivability of wildlife that currently live there and depend on the dense vegetative cover for protection from predators, for den sites, and for forage?
 5. What does it mean that the City staff worked with the consultants to make sure alignment of the surface area would avoid any of the identified species? Avoiding identified species is not something the City staff is qualified to represent fully to a consultant. A biologist should be the only person representing this kind of information on behalf of the City and in a collaborative process as well as to honor the NCCP, the City would request that a biologist from the Palos Verdes Peninsula Land Conservancy provide this information to the consultants.
 6. Studies have shown us that California gnatcatchers, cactus wrens, and mammals are present in the proposed project area. What data is there to demonstrate that the noise and other impacts of heavy equipment such as bulldozers, engines roaring, men shouting, radios blaring--all common to construction sites--will not have an adverse impact on the protected species and other wildlife?
 7. What modifications will the consultants and RPV staff make in their FS recommendations to show true prioritization of minimizing impacts on the Preserve?
 8. What are the most sensitive areas of the Preserve and how will they be avoided per the NCCP requirements? Please consult PVP Land Conservancy.
 9. Per the SR, the NCCP allows 3.3 acres of CSS take within the Preserve for landslide abatement measures. Channelizing upper Portuguese Cyn, Ishibashi Cyn and Paintbrush Cyn alone is estimated to "take" more than 10 acres of CSS. If the City and consultants are truly committed to honoring the NCCP, then why isn't channelizing the canyons rejected as an option as other landslide abatement measures considered were rejected?
 10. If the City uses its full allotment of CSS take for utilities and dewatering well maintenance simply to install the project, what is the City's plan for those activities after the project is installed?

11. How will the biological values of the area in the PBLC be preserved?
12. In years, what is the estimated timeframe that the proposal would set back the efforts already undertaken and progress already made to ensure the long-term viability and sustainability of the native ecosystem?
13. Who was consulted regarding native plants before the FS proposed uprooting them and planting them in sacs in the channelized canyons? Are consultants aware that some native plant species in the canyons have very extensive root systems, some 30-40 feet deep or greater, which themselves offer stabilizing and transpiration benefits?
14. The FS says at p. 72 that "ultimately, additional areas in the adjacent watersheds could also be lined, such as Eastern Altamira Cyn or Lower Klondike Cyn where storm water continues to infiltrate to groundwater in the vicinity of the project area." In addition, in the consultants' presentation, Klondike Cyn was mentioned and we're told that it should be controlled eventually. The consultants acknowledge that there is a lot of CSS in that canyon. Has the take from these canyons been considered in the total take calculations?
15. What inspections have been done in the canyons, if any, and under whose guidance?
16. "Take" in Rolling Hills is not mitigated by the NCCP. What mitigation efforts and permitting will be undertaken with respect to that take? Who will be the lead agency for that permitting?
17. What effect does dewatering have on plant life?

Process-Related Questions

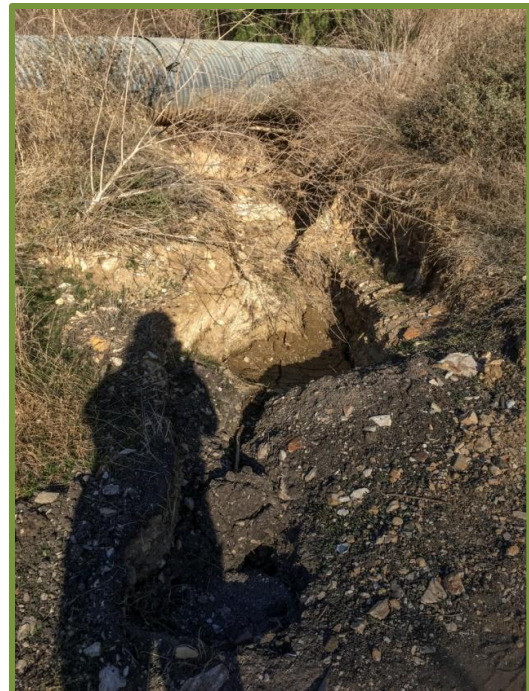
1. Conversations with the consultants following the CC meeting suggest that the consultants would benefit from regular input from PVPLC staff and its volunteers. What is the plan going forward to bring in the PVPLC and its volunteers on a regular basis to engage in back-and-forth dialogue with the consultants?
2. Was ACLAD (Abalone Cove Landslide District) consulted for their data and feedback during the FS process?
3. Who is the "environmental expert" on the team; what is his/her background; and what has been his/her contribution? (When the issue was raised last

summer, the public was told that there is an environmental expert on the team.)

4. Why doesn't the FS take into account the time frame and feasibility of permitting and various agencies' reviews (other than mentioning there would be constraints) with respect to the myriad project proposals?

Other Questions

1. If we have a heavy rain year in the middle of the project when all the habitat has been torn up and nothing yet installed or only partially installed to manage the water flow, what measures will be taken to prevent Palos Verdes Drive South and the Portuguese Bend community becoming "another" Route 101 and Montecito, CA?
2. What measures can be implemented now without further study, such as repairing or replacing existing infrastructure (e.g., corrugated pipes) to direct water off of the lower PBR?
3. What percentage of the PBLC is within the City of Rolling Hills?
4. What support is there from Rolling Hills?
5. What impact have past construction projects had on the land movement, for example, to what extent have Burma Rd., Peppertree Tr., and PVDS dammed the natural flow of water down the canyons to the ocean and how can those projects be re-designed to mitigate the problems?
6. To what extent will existing poor drainage infrastructure be repaired prior to pilot projects and other work? For instance, after the rains of 2017 resulted in significant runoff on and along Peppertree Tr., the trail was filled and re-graded, resulting in damming of the naturally-formed runoff trenches. Recent rain filled these trenches and pooled in the lower part of PBR, allowing rain water to infiltrate the ground rather than running off.



7. What is the involvement of the Klondike Cyn landslide with the Portuguese Bend landslide as mentioned by Mr. Cullen in the CC meeting of 1/16/18?
8. There's an assumption that the grading done in 1987 as per POC II (moving 500,000 yards from steep areas to flat areas) slowed the land movement. Has anybody looked at the rainfall during that time to determine whether other variables might be responsible for the slower movement?
9. At what point in the process will the noise, dust, trail closures and other impacts of the extensive construction work over a long period of time, on trail users, residents of Rolling Hills and the Portuguese Bend community, and visitors to Terranea Resort be considered in the mix of concerns?
10. Portuguese Bend Club is involved in slide remediation in their area. Have the possible impacts of their grading and other work on the Klondike Cyn slide and/or the PBLC, whether positive or negative, been systematically examined?

Alternatives

1. Surface drainage within the landslide is poor, said consultants during the CC meeting, and "can't get water to move through to the ocean where it normally and originally and natively went to. It gets essentially dammed up by the slide material." Was some of that "slide material" deposited by man and why not focus on returning to a more natural drainage course, particularly because the PBLC apparently showed little movement for decades (centuries?) until man began to grade the area for roads, damming the natural water courses?
2. The consultants' presentation indicated that the "lower reaches of Portuguese and Paintbrush Canyons have been destroyed". They were destroyed by man. What is the feasibility of restoring the lower reaches of the canyons to allow rainwater to flow naturally to the ocean?
3. Has an analysis been done on leaving the upper reaches of the canyons in their natural state and only addressing the lower reaches, for example possibly lining "the sandbox", or part of it, with some type of flexible fabric and directing the water from that low area down to the ocean through some type of flexible piping?
4. What is the feasibility--risks and benefits--of creating a wetland atop a liner in the low area of the sandbox?

5. What is the feasibility of supporting PVDS on caissons or other support structures down to the basalt bedrock, or creating a floating road or a bridge, anchored on both ends of the land flow, allowing the land flow to pass below the road surface?

Supporters of These Question Submissions to Date (2/2/18)

- | | | |
|-----------------------------|-----------------------------|-----------------------------|
| 1. <i>Eva Cicoria</i> | 33. <i>Bill Ailor, PhD</i> | 66. <i>Virginia Cicoria</i> |
| 2. <i>Ken Swenson</i> | 34. <i>Jim Knight</i> | 67. <i>Carolynn Petru</i> |
| 3. <i>Pam Emch, PhD</i> | 35. <i>Cassie Jones</i> | 68. <i>Andy Petru</i> |
| 4. <i>Barb Ailor</i> | 36. <i>John Spielman</i> | 69. <i>Sharon Fair</i> |
| 5. <i>Jim Rassler</i> | 37. <i>Kathy Christie</i> | 70. <i>Joe Platnick</i> |
| 6. <i>Cynthia Woo</i> | 38. <i>Susan Cyr</i> | 71. <i>June Treherne</i> |
| 7. <i>Randy Harwood</i> | 39. <i>Tom Cyr</i> | 72. <i>Linda L. Varner</i> |
| 8. <i>Noel Park</i> | 40. <i>Scott Ammons</i> | 73. <i>Leonard W.</i> |
| 9. <i>Tony Baker</i> | 41. <i>Lewis Enstedt</i> | <i>Varner</i> |
| 10. <i>David Sundstrom</i> | 42. <i>Megan McElroy</i> | 74. <i>Jeremiah N.</i> |
| 11. <i>Barbara Gleghorn</i> | 43. <i>Amy Friend</i> | <i>George, PhD</i> |
| 12. <i>George Gleghorn</i> | 44. <i>Rick Wallace</i> | 75. <i>David Quadhamer</i> |
| 13. <i>Ann Shaw</i> | 45. <i>Grace Wallace</i> | 76. <i>Kathy Hill</i> |
| 14. <i>Allen Franz</i> | 46. <i>Peter Shaw</i> | 77. <i>Leslie Chapin</i> |
| 15. <i>David Berman</i> | 47. <i>Marianne Hunter</i> | 78. <i>Christine</i> |
| 16. <i>Bill Lavoie</i> | 48. <i>Wendy Watson</i> | <i>Campbell</i> |
| 17. <i>Dave Wiggins</i> | 49. <i>Joan Kelly</i> | 79. <i>Tami Podesta</i> |
| 18. <i>Donna</i> | 50. <i>Vicki Hulbert</i> | 80. <i>Gina Henderson</i> |
| <i>McLaughlin</i> | 51. <i>Randy Hulbert</i> | 81. <i>Mark McGinn</i> |
| 19. <i>Ian Song</i> | 52. <i>Katie Vanderhal</i> | 82. <i>Adela Barnett</i> |
| 20. <i>Barbara Sattler</i> | 53. <i>Jeremy Vanderhal</i> | 83. <i>Bruce Biesman-</i> |
| 21. <i>Rob Kautz</i> | 54. <i>Joyce Jessoe</i> | <i>Simons</i> |
| 22. <i>Elizabeth Sala</i> | 55. <i>Brett Barker</i> | 84. <i>Bob Ford</i> |
| 23. <i>Heather White</i> | 56. <i>Geraldine Cole</i> | 85. <i>Al Sattler</i> |
| 24. <i>George Neuner</i> | 57. <i>Brian Donnelly</i> | 86. <i>South Coast</i> |
| 25. <i>Diana Bailey</i> | 58. <i>Cynthia Donnelly</i> | <i>Chapter of the</i> |
| 26. <i>Evi Meyer</i> | 59. <i>Mel Lefkowitz</i> | <i>California Native</i> |
| 27. <i>Emile Fiesler</i> | 60. <i>Linda Wu</i> | <i>Plant Society</i> |
| 28. <i>Cathy Nichols</i> | 61. <i>Denise Donegan</i> | |
| 29. <i>Jim Aichele</i> | 62. <i>Terry Scott</i> | |
| 30. <i>Bob Shanman</i> | 63. <i>Jim Scott</i> | |
| 31. <i>Mike Kilroy</i> | 64. <i>Sharon Yarber</i> | |
| 32. <i>Greg Marcelo</i> | 65. <i>Virgil Cicoria</i> | |

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INDIVIDUALS

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Portuguese Bend EIR Scoping

Ken Dyda Comments 01/03/2021

PREAMBLE:

It seems the approach in this EIR Scoping looks at the slide as something like a development on stable land. It is not. It has been a moving disastrous environmental impact inherited from the county for over 50 years. Criteria for stable land do not apply.

The slide was triggered when LA County attempted to extend Crenshaw Boulevard to PV Drive South. In doing so, it deposited huge quantities of dirt that was excavated for the roadbed and Imbalanced the area that was in a state of unstable equilibrium. For some unknown reason this action was ignored. Instead, the slide was blamed on surf zone erosion. Three attempts proved that it was an erroneous thinking assumption. Water was the contributing factor which was demonstrated when ACLAD controlled the slide in the Abalone Cove area.

The current effort is to identify the real problem and implement mitigating measures. Therefore, the measures contemplated are actually mitigating the mitigating measures. As such these secondary mitigating measures should be viewed as **increments** to the existing environmental impact.

14,000,000 yd.³ of habitat have been lost and polluted the Pacific Ocean as of 2016. For every year of delay an average of 237,000 yd.³ of habitat and ocean pollution will continue. Palos Verdes Dr., South has sunk some 200 feet. The roadbed is now on wet soil. The potential of losing Palos Verdes Dr., South, cutting the city in two, and rupturing the force main sewers has become a matter of not whether it will happen only when. The bureaucratic delays in this emergency merely delay this project and make the “when” potentially closer.

The city of Torrance was delayed 8 years to get approval to widen PCH at Hawthorne to alleviate a traffic problem.

This is Paralysis by Analysis.

Comments and Questions.

Section 1.2“ Project Location and Site Characteristics”.

A. Why is Founders Park in the project?

Section 1.2.1. General Plan Designation/Zoning

Why was the land-use map in the 1975 general plan used rather than the updated version in 2018?

Section 1.3 Project Description

In this section the report acknowledges that we are involved in mitigating measures. Why are we now mitigating mitigating measures?

Section 1.4 Project Construction. (Comments)

Historically the land movement was very slow during dry periods. After a rainfall (approximately 4 weeks) the slide motion accelerated to a rate of as much as 8 or 11 feet per year. As a result, capturing and diverting surface water as well as preventing intrusion through fishers would be the first steps to reduce the **major** movement events. We know where the water is coming from and how to direct it to the ocean being environmentally sensitive. We also know where the fishers are to be filled. By knowing where the swales need to be installed and the fishers need to be filled has little risk of a failure. It also has the biggest impact on reducing total slide motion. This may be sufficient to control the slide.

On the other hand, the location of the hydraugers is not well known and would initially be experimental. Just like the 90 wells that were drilled (with only three currently operating) locating the subsurface water is not a very precise activity. Some were dry wells, some stopped pumping water even though the slide kept moving. Since the land kept moving many of the wells were also sheared and failed. Is it possible the land movement caused the path of the water to change?

Section 1.5.2. Reviewing Agencies

What is meant by or included in "discretionary powers"? Have all 21 agencies going to review and require changes? They did not review any of the project's location and site characteristics over the past 40 years of attempted mitigation.

Where is the Portuguese Bend Sewer District? Do they mean the Abalone Cove District? Why is the independent Abalone Cove Landslide Abatement District included in a reviewing agency?

Section 2 Environmental Determination (comments)

This is already a monumental disaster. The contribution to the mitigating measures to control the slide pale in insignificance. The slides in Palos Verdes Estates and on Del Mar in Los Angeles city were dealt with in less time than the scoping process we are currently working through.

Section 3. Evaluation of environmental impacts.

Again, this seems to be assuming the land is stable and not moving. Evaluation of what new impacts?

Section 4. Checklist of environmental issues.

In the following sections, is the basic thrust to compare the current environmental impact of all the repair and mitigating attempts (although ineffective) of the past to the average level of what the

projected potential incremental level would be for the effort to mitigate the slide?

Section 4.1. Aesthetics

A. How are the scenic vistas subjected to potentially “significant impact” during the mitigating activity or by controlling the slide?

B. Do the scenic vistas encompass fissures?

When the slide is controlled, scenic views will be maintained rather than being continually changed.

Section 4.3. Air quality

What is the overall incremental impact compared to that which has been occurring during the past continuous road repair?

Section 4.4. Biological Resources.

What is the temporary incremental difference of impacting biological resources as compared to what has occurred during the life of the slide? All indigenous animal, human habitat and plant life modification has been a continuing process some 60 years. How will mitigating the mitigating measures identified for the current project reduce/mitigate the loss of biological resources? The fishers, swales, staging areas and access will all be replanted to blend in with the remaining biological resources.

Section 4.5: Cultural Resources

Historical, Archaeological and Formal Cemeteries etc. have not been uncovered by the massive slide movement. How will the mitigating measures identified for the current proposed EIR effort reduce/mitigate the loss of these resources?

Section 4.6 Energy.

What is the incremental energy compared to that of the current cost and maintenance process? Since the proposed landslide mitigating measures are all passive approaches and do not require energy for their operation.

Section 4.7. Geology and Soils

Surprise, this is already a landslide and we have lost 14,000,000 yd.³ of topsoil which is polluting the ocean. That's the equivalent some 60 years of the typical development excavation. How does the excavation required for the mitigating measures compared to an average of over 237,000 yd.³ that is being lost annually? Without mitigating the slide this will continue.

Section 4.8 Greenhouse Gases.

How does this compare incrementally with the current constant road repair?

Section 4.9 Hazardous and Hazardous Materials.

What hazardous materials during construction, if any, are contemplated that would make evacuation more difficult? What activities would increase the likelihood of wildfires?

Section 4.10 Hydrology and Water Quality.

Again, 14,000,000 yd.³ of dirt have polluted the ocean. How's that for quality! What incrementally would act as a continuing pollution caused by the contemplated activity?

Section 4.11. Land Use in Planning.

Based on the update in General Plan, other than the road and open space that currently exists what of the land-use would be affected?

Section 4.13 Noise

Is the noise contemplated to exceed the city standards for the swales and fishers that are being filled? Will the drilling of the Hydro augers, in the open land between Palos Verdes Dr., South and the Pacific Ocean contemplated to exceed ordinance levels in what nearby residents?

Section 4.17 Transportation. (Comments)

The significant impacts exist currently. Controlling the slide in the ability to relocate without the landslide induced severe curves as well of the three steep inclines caused by the slide would improve safety. This would also provide a major element to emergency evacuations.

Section 4.18 Tribal Cultural Resources. (Comment)

To the extent, if any existed prior to the slide, none have been uncovered.

Section 4.19 Utilities and Services.

Currently the utilities and service systems including water gas electricity and sewers are in total disarray.

What is there to impacttr?

Section 4.20 Wildfire (Comment)

The current wildfire exposure to strained aboveground electrical service hazard would not be increased.

Section 4.21 Mandatory Findings of Significance. (Comments)

(A) This project will substantially eliminate the current degradation of the quality of the environment.

(B) The cumulative effect of these mitigation measures will significantly reduce individual or cumulative effects.

(C) The environmental effects, by controlling the slide, will significantly reduce the current human and biological habitat impacts.

It appears that the entire scoping session is designed to identify impacts of the efforts to mitigate the slide. It does not take into account the fact that mitigating the slide significantly reduces and, in some cases, eliminates most if not all of the current environmental impact. Most of the impacts identified are currently occurring. This is not a new project on virgin soil but a mitigation of an existing disaster. Time is of the essence in that the more we delay the effort the more likely the ability to control the slide will no longer be an option. After all, Hydro augers is an experiment. They address a very small contribution to the annual slide movement. With the other water control features, they may not be required. **Paralysis by Analysis!**

Alternative to the Detention Pond

The current detention pond to throttle the water flow from the swales was included strictly from a cost-saving standpoint. It is intended to use an existing culvert that has limited capacity. Once the detention pond is full the flow through the culvert will again be limited by the culvert. In a heavy rain it could exceed the capacity of the existing culvert and end up overflowing the pond. This is a much less than the desired result. The long-term benefit and avoiding the potential risk is worth a better long-term solution. A culvert(s) of sufficient size to not require a detention pond is, in my view, a much better long term solution. The cost of the detention pond could be avoided and used to offset some of the cost of a properly designed culvert.

QED

Dear Rancho Palos Verdes City Council Members:

As a hiker, equestrian and homeowner in the Portuguese Bend community, I am writing to express concern over the impacts of the Landslide Mitigation Project as well as the parking and access projects.

Encircled as we are by the nature preserves and the public trail systems on all sides, each proposed project, while possibly worthy, impact us all. Each project encroaches on current trails, habitat and public health by bringing more people to less and less space. The project mitigation plans do not address the impact on the horse community and those who wish to continue to recreate safely on the trails. In 1984, the city approved The Trail Network Plan to enhance and maintain the trails. **City staff were directed to watch for opportunity to enhance the trail network where other projects are proposed and initiated by staff.** The plan included the need for disaster evacuation, firefighting access and other emergency preparedness concerns. The Palos Verdes Loop trail has already been disrupted. Due to erosion and lack of maintenance, new ways of getting through were created by trail users who then encroached on private property, which was later closed off. These factors have led to the loss of full segments of the trail network.

We ask that while you plan both the parking and landslide mitigation projects, as well as any future projects, you follow the already adopted Trail Network Plan and look to enhance the trail network at every opportunity. This includes engineering permanent trail routes, canyon crossings, erosion control and access to trails from the Portuguese Bend Community. Access to Jack's Hat and Three Sisters is now at risk, dependent on property owners and conservancy to make a deal. This too puts more people on fewer trails which affects us all, the habitat and public safety. **Please include the 1984 Trails Network plan in your plans.**

Sincerely,

Laura Feldman

Kelene Strain

From: Nasser Razepoor <nrazepoor@rpvca.gov>
Sent: Thursday, January 7, 2021 8:33 AM
To: Kelene Strain
Subject: FW: URGENT: What right does the city have to propose a hydrauger on my client's PRIVATE property?

Good morning Kelene,

Below is another email we have received regarding the PBLM project environmental study.

Thanks,

Nasser Razepoor, PE
Associate Civil Engineer
Department of Public Works
[City of Rancho Palos Verdes](#)
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275
Tel: 310-544-5307
Fax: 310-544-5292



To limit public contact and help prevent the spread of COVID-19, City Hall is temporarily closed to the public, but services are available by telephone, email, online and limited curbside service. Some employees are working on rotation and may be working remotely. Please note that our response to your inquiry could be delayed. For a list of department phone numbers, visit the [Staff Directory](#) on the City website.

From: George Fotion <george.fotion@homeispalosverdes.com>
Sent: Wednesday, January 6, 2021 8:21 PM
To: PublicWorks <PublicWorks@rpvca.gov>; Eric Alegria <Eric.Alegria@rpvca.gov>; David Bradley <david.bradley@rpvca.gov>; John Cruikshank <John.Cruikshank@rpvca.gov>; Barbara Ferraro <barbara.ferraro@rpvca.gov>; Ken Dyda <Ken.Dyda@rpvca.gov>
Subject: URGENT: What right does the city have to propose a hydrauger on my client's PRIVATE property?

I am copying the Trustee of "Villa Francesca" in this email and advising him to strenuously object to this proposal. The cut and pasted image is from figure 7 on page 14 of the first link. Not only will initial construction detrimentally impact the property's market value but there will

likely be ongoing maintenance and access needed to service the hydrauger and monitor its effectiveness. This will cause long-term negative impacts on the landowner's uninterrupted enjoyment of their property and ability to sell the property at its maximum market value. It is beyond the pale that you have, to my knowledge without notice to my client, proposed such a malicious and abusive taking of their property rights.

Note to Mr Sargent: I strongly advise that you contact the city and file a most strenuous objection to this proposal. Please let me know if you need a referral to legal counsel to protect the Trust's interests.

https://www.rpvca.gov/DocumentCenter/View/16324/RPV-Portugese-Bend_IS_FINAL-111120

<http://www.rpvca.gov/DocumentCenter/View/16316/PBLS-NOP-w-Figure-110620>



- Project Site Location
- Hydrauger Locations**
- Directional/Gravity Flow
- Directional/Pump Assisted Flow
- Horizontal/Gravity Flow

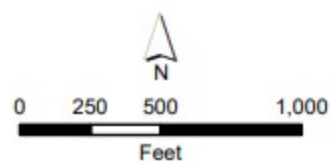


Fig
 Portuguese Bend Landslide Mit
 Hydrauger Loc

Name: 21243 PLAN Fig 7 Hydrauger Locations.Mxd
 Print Date: 10/21/2020, Author: pcarlos





George Fotion

433 Via Corta

Palos Verdes Estates, CA 90274

Call Realty Best Palos Verdes Homes

text cell: (424) 226-2147 / voice cell: (310) 346-6467

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■

Dear Rancho Palos Verdes City Council Members:

As a hiker, equestrian and homeowner in the Portuguese Bend community, I am writing to express concern over the impacts of the Landslide Mitigation Project as well as the parking and access projects.

Encircled as we are by the nature preserves and the public trail systems on all sides, each proposed project, while possibly worthy, impact us all. Each project encroaches on current trails, habitat and public health by bringing more people to less and less space. The project mitigation plans do not address the impact on the horse community and those who wish to continue to recreate safely on the trails. In 1984, the city approved The Trail Network Plan to enhance and maintain the trails. **City staff were directed to watch for opportunity to enhance the trail network where other projects are proposed and initiated by staff.** The plan included the need for disaster evacuation, firefighting access and other emergency preparedness concerns. The Palos Verdes Loop trail has already been disrupted. Due to erosion and lack of maintenance, new ways of getting through were created by trail users who then encroached on private property, which was later closed off. These factors have led to the loss of full segments of the trail network.

We ask that while you plan both the parking and landslide mitigation projects, as well as any future projects, you follow the already adopted Trail Network Plan and look to enhance the trail network at every opportunity. This includes engineering permanent trail routes, canyon crossings, erosion control and access to trails from the Portuguese Bend Community. Access to Jack's Hat and Three Sisters is now at risk, dependent on property owners and conservancy to make a deal. This too puts more people on fewer trails which affects us all, the habitat and public safety. **Please include the 1984 Trails Network plan in your plans.**

Sincerely,

Lisa Gladstone and Milton Owens

18 Cinnamon Lane

RPV, CA

aram@rpvca.gov
www.rpvca.gov



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From: Sheri Hastings <sheriastings@yahoo.com>
Sent: Monday, December 14, 2020 9:14 AM
To: CC <CC@rpvca.gov>; Katie Lozano <KatieL@rpvca.gov>; CityClerk <CityClerk@rpvca.gov>
Subject: Re: Portuguese Bend Trail Network

Dear Rancho Palos Verdes City Council Members:

As a resident of Portuguese Bend and as a hiker and equestrian in the Portuguese Bend community and as someone who cares deeply about preserving local wildlife, I am writing to express concern over the impacts of the Landslide Mitigation Project as well as the parking and access projects.

Any proposed landslide mitigation project impacts us. Parking and access projects impact us.

In 1984, the city approved The Trail Network Plan to enhance and maintain the trails. City staff were directed to watch for opportunity to enhance the trail network where other projects are proposed and initiated by staff. The plan included the need for disaster evacuation, firefighting access and other emergency preparedness concerns. The Palos Verdes Loop trail has already been disrupted. Due to erosion and lack of maintenance, new ways of getting through were created by trail users who then encroached on private property, which was later closed off. These factors have led to the loss of full segments of the trail network.

We ask that while you plan both the parking and landslide mitigation projects, as well as any future projects, you follow the already adopted Trail Network Plan and look to enhance the trail network at every opportunity. This includes engineering permanent trail routes, canyon crossings, erosion control and access to trails from the Portuguese Bend Community. Access to Jack's Hat and Three Sisters is now at risk, dependent on property owners and conservancy to make a deal.

Since the Conservancy took over the land near me there have been more hikers and more large groups of hikers on the trails. Large loud groups of people impacts the nesting birds and other wildlife on the trails. This puts more people on fewer trails which affects us all, the habitat and public safety. Many hikers and bikers are unaware of safe behavior around horses, so forcing all trail users into the same small space is extremely dangerous not only for equestrians, but also for other trail users. And heavy usage it also impacts wildlife along those trails. Expand the trails but have fewer people on them.

An expanded and managed trail network is crucial to safety. Please include the 1984 Trails Network plan in your plans.

Sincerely,
Sheri Hastings
Portuguese Bend Resident and Portuguese Bend Trail User

Comments on Portuguese Bend Landslide Mitigation Initial Study (IS) dated November 2020

By Jim Knight as a homeowner in Portuguese Bend
Date: 1-11-2021

1.2-Project description

Figure 1 (as well as all other figures) shows a project area that excludes most of Abalone Cove Shoreline Park and is inconsistent with the project description.

The IS on p. 5 has a project description as the Portuguese Bend Landslide Complex (PBLC) and includes the Abalone Cove Shoreline Park which features two beach areas (Abalone Cove and Sacred Cove).

Former City Geologist Perry Ehlig described the Portuguese Bend Landslide Complex as including the Abalone Cove Landslide Area (ACLA) and all of Abalone Cove Shoreline Park.

The IS figures should include the Abalone Cove area as this is an area of instability that is not only connected to the easterly Portuguese Bend Landslide Area (PBLA) but affects the road integrity of PVDS above Abalone Cove Shoreline Park causing recent major repairs by the City.

The City in the past has initiated studies on mitigation for the ACLA.

Just to name a few of the more recent studies:

- 1995 Altamira Cyn. Drainage Control Project wherein one mitigation was to infill the fissures in the canyon;

- 2012 the City Council adopted Goals and Priorities that included addressing the Portuguese Bend and Abalone Cove land instability. In addressing that goal, staff recommended to close critical fracture zones in Altamira Cyn. to prevent stormwater infiltration to the subsurface of the Abalone Cove Landslide.

- 2015 Council awarded a professional services contract to Harris and Associates for the Altamira Cyn. Drainage Project who were to provide no less than 4 alternative designs addressing “groundwater infiltration and associated stormwater related soil erosion within Altamira Cyn.”.

To date, none of the recommendations from any study have ever been implemented.

Council in the past has set a goal to address critical fracture zones in Altamira Cyn. and now this project area should include the Abalone Cove area and Altamira Cyn. Addressing the impact of stormwater in Altamira Cyn. is especially important now that the City has opened development in Zone 2 creating additional stormwater runoff into the canyon.

1.4.1 Surface Fracture Infilling

This mitigation is exactly what is needed for the ACLA and was proposed for Altamira Cyn. in the aforementioned studies conducted by the City. In the City's current data base is a hydro-geological study done in 2000 which concluded that only a fraction of the stormwater entering Altamira Cyn. ends up at the ocean outlet. The majority of the stormwater is infused into the subsurface via canyon fissures contributing to land instability as evidenced by Abalone Cove GPS monitoring. As mentioned above, the City has already had to repair PVDS below Altamira Cyn. near Wayfarers' Chapel due to the road curb slumping.

One project area impacted by Altamira Cyn. and is in the figures of the IS is the area above Sacred Cove where the City has spent a lot of money repairing PVDS as it drops dramatically toward the ocean (sometimes referred to as the "ski jump"). I have had numerous discussions with geologist Dr. Robert Douglas about this area and he explained to me that there are two fundamental reasons why there is such a dramatic drop here. The one reason is that this area of Sacred Cove beach between two stable basalt points erodes away and revetment support is lost over time. The other reason is that water is infusing into this area from fissures nearby in Altamira Canyon.



In addition to the priority of reducing costs of road repair, it would also seem to be in the best interest of the City to address the impacts of Altamira Cyn. to land instability which can dramatically affect the lives of homeowners living in the Abalone Cove area. The local residents have been paying into a Landslide Abatement District for years to maintain dewatering wells that have no doubt helped reduce some land movement and has aided the City in reducing road repair costs along PVDS. This project is an opportunity for the City to help the local resident's efforts and include fixing the fissures of Altamira Canyon alongside the fixing of fissures in the Portuguese Bend area.

Thank you for the opportunity in commenting on the Initial Study.

Jim Knight

Kelene Strain

From: Nasser Razepoor <nrazepoor@rpvca.gov>
Sent: Wednesday, January 13, 2021 5:30 PM
To: Kelene Strain
Subject: FW: Portuguese Bend Landslide Control Environmental Impact Report Notice of Preparation Comments

Hi Kelene,

Here is another comment email letter.

Thanks,

Nasser Razepoor, PE
Associate Civil Engineer
Department of Public Works
City of Rancho Palos Verdes
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275
Tel: 310-544-5307
Fax: 310-544-5292

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

From: Ramzi Awwad <rawwad@rpvca.gov>
Sent: Wednesday, January 13, 2021 5:20 PM
To: Nasser Razepoor <nrazepoor@rpvca.gov>
Cc: Ron Dragoo <RonD@rpvca.gov>
Subject: FW: Portuguese Bend Landslide Control Environmental Impact Report Notice of Preparation Comments

Nasser,

Please make sure this is included in the comments. Please respond to Mr. Park to let him know that this emails are part of the record. Thanks.

Ramzi

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

From: Noel Park <noelparkone@gmail.com>
Sent: Wednesday, January 13, 2021 4:07 PM

To: CC <CC@rpvca.gov>; Ara Mihranian <AraM@rpvca.gov>; Ron Dragoo <RonD@rpvca.gov>; Ramzi Awwad <rawwad@rpvca.gov>

Subject: Portuguese Bend Landslide Control Environmental Impact Report Notice of Preparation Comments

I have attended all of the public meetings related to this project. I have offered many comments at those meetings and have participated in posting comments on the display boards, as have many of my fellow Rancho Palos Verdes residents. I assume that all of that is part of the public record. Please incorporate it by reference into the preparation of this EIR.

I have sent a number of comment emails to the City over the period of consideration of the project. These must be part of the public record as well. I ask that they be incorporated by reference as well. I have recently attempted to find them in my files and have recently forwarded them again for your convenience.

I am a long time member of, and contributor to, the Palos Verdes Peninsula Land Conservancy (PVPLC). They have demonstrated an extreme level of expertise concerning all aspects of Nature Preserve stewardship, restoration and management. I totally agree with and support any comments which they may submit. Please add me as another resident voice supporting their comments.

This proposed project would take place largely in a dedicated nature preserve. The nature preserve was founded for the purpose of protecting and restoring Coastal Sage Scrub habitat which has largely disappeared in California. This was also intended to provide habitat for endangered and threatened species such as the California Gnatcatcher, the Cactus Wren, and the Palos Verdes Blue butterfly. Equally important in my view is that it also provides a place to live for a wide variety of other wildlife. As such, I submit that there is a responsibility to do any project with extreme sensitivity and to go over and above such concepts as "take", to ensure that the project does not degrade the habitat in any way and, in fact, enhances it. I would also submit that the City controlled property, popularly known as "Gateway Park " should be treated with equal sensitivity to the extent that it contains Coastal Sage Scrub habitat.

Under the California Environmental Quality Act (CEQA) there is a Duty To Mitigate. It requires the following:

1. Avoid negative environmental impacts to the greatest extent possible.
2. Minimize those impacts which cannot be avoided to the greatest extent possible.
3. Mitigate for those impacts which remain after avoidance and minimization.

Possibilities for avoidance and minimization are good. I have suggested many times that the designers should work in cooperation with the recognized experts of the PVPLC to adjust the alignment of installations to avoid and minimize the removal of or damage to existing CSS. A prime example is the staging area shown on the drawings. The PVPLC notes that it covers an area of prime CSS habitat. It should be relocated. Likewise, the alignment of other features such as flow channels could be adjusted. Construction and maintenance access roads and construction staging areas are equally impactful. They should be considered and controlled at the same level as the permanent installations. This was discussed with the City's consultants. We were assured that it could be done. The City's representatives should walk the site with the PVPLC representatives as many times as it takes to make sure that this is done.

After the impacts are avoided and minimized, there must be mitigation for any CSS removed. Again, this is a nature preserve. To blithely say, as the NOP document suggests, that we are allowed so many acres of "take" is unacceptable in my view. The whole reason for the Nature Preserve is to preserve and restore the CSS. To remove it without replacement is unthinkable to me. The City has a moral obligation to make the Nature Preserve whole for whatever CSS habitat is destroyed.

The project area contains many very large, mature, CSS specimens. CSS plants are very slow growing. Many of them could easily be over 50 years old. Therefore, a way must be found to mitigate for their loss. We learned from the Mitigated Negative Declaration for lower Hesse Park that the City was required to replace any acreage of CSS removed

on a 3:1 basis. We have learned that in the Nature Preserve this has somehow been reduced to 2:1. I won't even attempt to adequately express my feelings about that. My sense is that these ratios are somehow intended in part to account for the fact that the existing plants tend to be replaced with smaller seedlings which will take many years to mature. In any case some method must be devised to provide appropriate mitigation. I earnestly suggest that the City enter into a collegial, cooperative, effort with the PVPLC to make it so. The City should contract with the PVPLC to reimburse it for the cost of such mitigation.

There should be qualified environmental monitoring personnel on site during all construction to ensure that endangered and threatened species and other wildlife, and adjacent CSS habitat, are protected.

There will clearly be aesthetic impacts. In particular, the proposed retention basin will presumably be dry most of the time. This will present a vista of several acres of dry, plastic lined, pond to visitors and the public traveling by on Palos Verdes Drive South (PVDS). The visual impact of the various channels, and the resulting removal of CSS ground cover, should be analyzed as well. Mitigation should be provided for this, presumably in the form of additional CSS plantings.

The retention basin may slowly retain sediment and need to be cleaned out. Mitigation should be provided for any CSS removed to provide access roads and spoil removal.

There is a proposal to construct a parking lot for the Nature Preserve at the "Gateway Park". I note that this has been postponed until the landslide is "stabilized". It would still seem appropriate to analyze how it would interface with the project under consideration. In particular, how would the public access the site with its cars?

I discussed at length in a previous email the lack of any current soil borings other meaningful on site geotechnical investigation regarding this project. This would seem to be an extremely high risk strategy. I direct your attention to the Pacheco Dam in Santa Clara County. The news this week reported that the cost had suddenly jumped from \$1.3 billion to \$2.3 billion as a result of recent soil borings of the foundation conditions.

The drawings make no mention of what happens to the water after it exits the culvert under PVDS. Clearly, there is likely to be erosion as the water goes down the bluff to the ocean. Also, there would seem to be a good possibility of turbidity carried down from above PVDS. This needs to be addressed.

The Infrastructure Management Advisory Committee (IMAC) has made a very effective report regarding the project. They also presented to the scoping meeting. I agree with their findings and urge you to pay strict attention to them. You have their work product, so I won't repeat it at length here. But a few point bear reinforcement.

They suggest changing the phasing and doing the hydraugers first. That makes total sense. They stated that the hydraugers are expected to provide some 80% of the slowing of the slide. Clearly, the slide will not stop immediately, but will slow over time. Considering that some areas of the slide are reputed to be moving as much as 11 feet per year, the surface improvements would be highly exposed to damage or destruction if done first. He who ignores history is doomed to repeat it.

The flow line from the proposed retention basin to the existing culvert should be accurately surveyed immediately as a matter of urgency. If, as seems likely, there is not sufficient fall to convey the water, alternatives must be considered. If the grade of the retention basin must be raised, extensive additional grading, with the consequent impacts will be required. The IMAC has recommended studying a new culvert better aligned with the retention basin or possibly doing away with it.

The IMAC has done the City a great service in analyzing this project. You would be wise to pay close attention to their findings.

In summary, I have no objection to a project to control the landslide if the City judges it to be cost effective, and if every possible effort is made to make sure it works. My overriding concern is to see that the integrity of the Nature Preserve, its CSS habitat and its wildlife are maintained and enhanced by any such project.

Thank you for your consideration,

Noel Park
6715 El Rodeo Road
Rancho Palos Verdes CA 90275
562-413-5147

Sent from my iPhone

Enyssa Momoli

From: Ron Dragoo
Sent: Tuesday, December 15, 2020 1:21 PM
To: Noel Park
Cc: CC; Ramzi Awwad; imac
Subject: RE: IMAC Landflow report

Noel,

Thank you for your comments. In addition to the electronic format they have received, they will be provided as late correspondence to the City Council at the Saturday 12-19-2020 scoping meeting.

Best regards,

Ron Dragoo, PE
Principal Engineer

City Hall is open to the public during regular business hours. To help prevent the spread of COVID-19, visitors are required to wear face coverings and adhere to physical distancing guidelines. Some employees are working on rotation and may be working remotely. If you need to visit City Hall, please schedule an appointment in advance by calling the appropriate department and follow all posted directions during your visit. Walk-ups are limited to one person at a time. Please note that our response to your inquiry could be delayed. For a list of department phone numbers, visit the Staff Directory on the City website.

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

From: Noel Park <noelparkone@gmail.com>
Sent: Tuesday, December 15, 2020 11:05 AM
To: CC <CC@rpvca.gov>; Ramzi Awwad <rawwad@rpvca.gov>; Ron Dragoo <RonD@rpvca.gov>; imac <imac@rpvca.gov>
Subject: IMAC Landflow report

The Infrastructure Management Advisory Committee (IMAC) has done extensive work and analysis concerning the proposed landflow mitigation project. They have submitted a comprehensive report to you, raising many credible questions and offering many credible suggestions. I strongly urge you to carefully consider the report. The success of any project is at stake.

As a matter of primary urgency, a professional survey should been made of the alignment of the channel from the proposed retention basin to the existing culvert under Palos Verdes Drive South. It seems highly likely that the elevation of the retention basin is lower than that of the culvert. If so, the whole design may be called into question, or extensive grading may be necessary to raise the elevation of the retention basin high enough to achieve gravity flow.

The idea that this survey would be left to the construction contractor is extremely dangerous. If the design is found to be infeasible after a construction contract is let, the potential for large cost overruns is clear.

Finally, I would like to compliment the IMAC for its diligence and commitment in creating their extremely relevant and valuable report.

Sincerely,

Kelene Strain

From: Nasser Razepoor <nrazepoor@rpvca.gov>
Sent: Wednesday, January 13, 2021 5:30 PM
To: Kelene Strain
Subject: FW: Portuguese Bend Landslide Control Environmental Impact Report Notice of Preparation Comments

Hi Kelene,

Here is another comment email letter.

Thanks,

Nasser Razepoor, PE
Associate Civil Engineer
Department of Public Works
City of Rancho Palos Verdes
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275
Tel: 310-544-5307
Fax: 310-544-5292

To limit public contact and help prevent the spread of COVID-19, City Hall is temporarily closed to the public, but services are available by telephone, email, online and limited curbside service. Some employees are working on rotation and may be working remotely. Please note that our response to your inquiry could be delayed. For a list of department phone numbers, visit the Staff Directory on the City website.

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

From: Ramzi Awwad <rawwad@rpvca.gov>
Sent: Wednesday, January 13, 2021 5:20 PM
To: Nasser Razepoor <nrazepoor@rpvca.gov>
Cc: Ron Dragoo <RonD@rpvca.gov>
Subject: FW: Portuguese Bend Landslide Control Environmental Impact Report Notice of Preparation Comments

Nasser,

Please make sure this is included in the comments. Please respond to Mr. Park to let him know that this emails are part of the record. Thanks.

Ramzi

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Thank you for your consideration,

Noel Park
6715 El Rodeo Road
Rancho Palos Verdes CA 90275
562-413-5147

Sent from my iPhone

December 15, 2021

Ron Dragoo, City Engineer
City Council and Staff
Rancho Palos Verdes

via email

re: Scoping Comments re Portuguese Bend Landslide Mitigation Project

Dear Mr. Dragoo, City Council and City Staff,

Thank you for the opportunity to submit scoping comments for the environmental review of this proposed project.

Importance of the NCCP

The Initial Study (IS) seems to underplay the importance of the NCCP. The map in Figure 2 shows "Palos Verdes Conservancy Areas" rather than identifying the area shown as land covered under the NCCP.

We also wonder why the Initial Study has not listed CDFW and USFWS as Regulatory Agencies. Section 5.1 of the NCCP clearly states that *"All Covered Activities will be reviewed by the City to ensure their consistency with the NCCP/HCP. As they are proposed, the projects will be forwarded to and may be reviewed by the Wildlife Agencies during the applicable CEQA process (or other process) for consistency with this NCCP/HCP."*

Additionally, there should be at least one map showing the proposed project infrastructure and staging areas in relation to vegetation, habitat areas and sensitive species in the Preserve.

Although the NCCP does allow for certain impacts within the Preserve boundaries, it does not give blanket authorization for impacts. Any and all impacts to habitat within the Preserve must be avoided and minimized as much as possible as spelled out in Section 5.5 of the NCCP. Therefore, the Environmental Review must evaluate whether this Project proposal would indeed adequately minimize impacts to sensitive species and habitat.

Furthermore, although the engineering firm proposing this project has estimated a total impact to habitat and sensitive species that might fit within the allowances provided under the NCCP, there is no indication that they actually have the biological expertise to make such a determination.

Indirect as well as direct impacts to habitat and sensitive species must be considered in the Environmental Review. Changing the hydrology of the landslide area could be a risk to habitat. While such a change might possibly mitigate land movement, it may also result in profound unknown effects to surrounding native vegetation and the wildlife dependent on that habitat area.

Furthermore, claims that artificial swales could simply be configured to meander and then be "planted" cannot be considered as anything more than cosmetic - not adequate restoration or mitigation after natural ecosystems have been permanently destroyed.

Please address all previously submitted Public Comments

Many of the issues which were expressed in earlier comments are still relevant to the Project proposal. We therefore request that those cumulative concerns now be addressed in the DEIR.

Accordingly, we have attached excerpts from our comment letters dated December 17, 2018 and December 15, 2019 as well as a quote from the November 14, 2019 letter from the Palos Verdes Peninsula Land Conservancy as Appendices to this comment letter. Please respond to the issues stated in those letters.

In addition, other members of the public responded in great detail to the Feasibility Study and at various stages of public review. Please see:

<https://www.rpvca.gov/DocumentCenter/View/11522>

<https://www.rpvca.gov/DocumentCenter/View/11914/Draft-Feasibility-Study-Portuguese-Bend-Landslide-Complex---Responses-to-Public-Comments-PDF>

Many of the concerns and questions posed by the public have not been sufficiently answered and were deferred by the engineering consultants to the CEQA review process. All of those questions and comments from the public should now be incorporated into an Appendix in the DEIR and each concern should now be fully responded to in the Environmental Review.

Purpose and need related to sewer lines

The purpose and need for this project should be very clearly defined. In the early stages of this proposal, it seemed that the primary concern that was voiced by the city was to reduce the need for constant repairs to the road, Palos Verdes Drive South. That argument then shifted to dramatic warnings about the possibility for a massive sewage spill into the ocean if this particular project does not go forward.

If the city is going to seriously entertain solving the concern regarding potential collapse of the sewage lines that run along Palos Verdes Drive South in the landslide areas, then we all need to take a step back and consider the larger picture.

The landslide (slow moving or not) is not the only threat to those sewer lines. The Sanitation Districts themselves have stated that a serious vehicle accident along Palos Verdes Drive South could also severely impact the sewer lines. Certainly, an earthquake - particularly along one of the nearby faults - might also have the potential to damage those lines. Erosion seaward of the lines is another factor that must be considered. It is also possible that work on this project could cause a break in the lines.

There is no guarantee that the proposed project would stop the landslide. It has been stated that substantially slowing the landslide would be considered a success. But if there is any significant continuing land movement, the sewer lines would still need to be above ground, with frequent maintenance. The fact is that the existing sewer lines are badly located and would continue to be vulnerable to landslide, earthquake, erosion, vehicular accidents etc. whether or not this experimental proposal is implemented.

Therefore, if indeed one of the goals of this project is to prevent breakage of the sewer lines, then Alternative measures which would serve to avoid a catastrophic break of those sewer lines are directly related to this proposed project's goals and must also be considered in this Environmental Review.

The Environmental Review for this project proposal should include a cost/benefit comparison of relocating/reconfiguring these sewer lines. An alternative plan might be to eliminate the pipes running through the landslide area, sending all flow originating west of the landslide to flow to the west, quite possibly along Palos Verdes Drive West. All flow originating east of the landslide could then flow to the east using the existing sewer lines. The IMAC report mentions that the Sanitation Districts did a study in 2009 looking at two alternative routes for pipes to avoid the landslide. Such a study should be revisited.

Directly addressing the risks of keeping the sewage lines in their current location makes far more sense than turning a blind eye to the many risks to those lines. The problem of the sewer lines is not going to go away unless it is addressed directly.

Project Phasing

We support the recommendation from IMAC that preliminary prototypes of the hydraugers should be in the first phase of project implementation.

We particularly appreciate their advice that should the hydraugers prove successful, then other elements of this project proposal could potentially be significantly scaled back. This could result in a commensurate reduction in associated impacts to natural habitat and sensitive species.

Therefore, the Environmental Review should specifically consider the potential comparative impacts of such phasing alternatives. For example, if the hydraugers prove to be effective, it might be possible to avoid implementation of the large drainage swales and their major permanent impacts to habitat areas.

Likewise, we are concerned that the proposal to focus all drainage to a single basin and output could be disastrous.

Fissures

We request that material for filling of fissures be restricted to clean natural soil from a compatible source.

Request for Project Alternatives

We respectfully request that the following additional Alternatives be added to the Environmental Review of this project proposal:

1. An Alternative which separately considers the costs and benefits of reconfiguring the sewer lines that currently run through the landslide area along Palos Verdes Drive South.
2. An Alternative specifically evaluating the phasing of preliminary testing of prototype hydraugers first, as recommended by the IMAC. Such an Alternative might potentially reduce or eliminate both the need and the costs and environmental impacts of some of the other measures proposed by the consultants.
3. An Alternative restricting material to be used to fill fissures to clean natural soil.

Thank you for your attention to these concerns.

Sincerely,

Alfred and Barbara Sattler

Appendices:

- A. Excerpts from our letter dated December 17, 2018
- B. Excerpts from our letter dated December 15, 2019
- C. Excerpts from PVPLC letter dated November 14, 2019

Appendix A.

Excerpts from our letter dated December 17, 2018:

.... the Feasibility Study (FS) provided by DBS&A never recognized, acknowledged or evaluated the potential contributions of intact native vegetation to ground water management.

Will DBS&A use the data provided by the synoptic stream flow discharge survey (Task C-1-2) to simply quantify a presumption that any decrease in water volume from head end to out flow means that the “missing” water has gone into the ground, or will DBS&A also consider the possibility that significant amounts of water may also be pulled up by plants? Does DBS&A have any specific baseline information about what the rate of water uptake might be for individual plant species? How does DBS&A propose to determine whether water migrates to a problematic area of the slide zone as opposed to remaining underground for later uptake by plants?

Task C-2 refers to a “Water Balance / Groundwater Source Assessment”. Shouldn’t such an overview include the relationship of vegetation to the groundwater?

It is important that any baseline analysis for remediation design be truly comprehensive and include all relevant and necessary biological data. Generic assumptions should not be made based upon water measurements alone.

An expert Biological Study of how the native coastal sage scrub and grassland depend upon and manage water is needed.

1. How much water is needed for local native plant health?
2. How much water can locally native plant species pull up from the ground in wet conditions?
3. How fast does this happen? (Hours/days/weeks?)

These are questions for expert qualified biologists, ecologists and plant physiologists – not for geotechnical consultants. The answers should be incorporated into any baseline for design for reduction or diversion of groundwater in the Preserve before the city commits to any further actions.

In their response to the city’s RFP, DBS&A mentions “Riparian Evapotranspiration” evaluation as being one possible “Suggested Additional Task” that could be done for this project. A search for existing literature focusing on riparian species could perhaps be quite useful in a comprehensive overview of the area hydrology. However, that limited plant data alone would not be enough since riparian species comprise only a small proportion of the natural vegetation of the Preserve. A broader investigation is needed to identify the water taken up by all of the plant species present in the area of concern.

Native vegetation can quickly take up more water than one might think

Evapotranspiration is commonly measured in situations where supplemental irrigation needs are being considered and in evaluations of wetlands. Riparian plants have adapted to draw up large amounts of water that they then transpire through their leaves in order to survive in extremely wet situations, including flooding.

Coastal sage scrub plant species are not so free about giving up water through transpiration, and in fact have evolved various mechanisms to store water – such as waxy or hairy leaf coatings. But reluctance to give off water to the air does not mean these plants are not taking up water from the ground. Many of the local native plant species store quite a lot of moisture in their leaves and stems and can grow and enlarge quite dramatically and quickly when water is available.

For example, it is not unusual for lemonade berry to become very large, adding many new very long branches in a single season. Likewise, I have often noted when hand-watering the Native Plant Garden at Point Vicente, that plants that look dried out initially can perk up visibly even in a brief one or two hour time span. These bits of evidence tell me that local native plants can and do take up large amounts of water very quickly.

The city needs expert biological data to quantify the water take up (not just evapotranspiration) of the local native plant species.

The natural hydrological functions of native vegetation should be integrated with any remediation design to address water movement in the landslide area.

This is an approach that is proving to be effective in many situations dealing with water influxes. Native vegetation can be part of the solution – it should not be regarded as part of the problem. Rather than blanketing our natural Preserve areas with artificial membranes, perhaps we would be better served by understanding and restoring the functions of native vegetation.

Perhaps much of the desired goal of reducing the flow of excess groundwater could be achieved by appropriate revegetation and restoration of native plant species.

Perennial native grasses, for example, are known to have much deeper root systems than non-native annual grass species. Restoration of this area by replacing weedy non-native grasses with native grass species could be helpful in reducing excess groundwater. Likewise, many native coastal sage scrub (css) species are known to have very deep root systems and restoration of the css can be beneficial.

Maintaining the health of the native vegetation in the Nature Preserve is an essential goal

The Palos Verdes Nature Preserve is not a landfill, and should not be treated as if it were.

The goal of any geotechnical engineering in the Nature Preserve should not be to remove all the groundwater. There must be a determination of what amount of water is necessary to maintain healthy natural vegetation and no attempt should be made to remove ground water other than that which is in excess of the needs of healthy native vegetation.

The city must be mindful that any changes to the hydrology of this watershed that undermine the health of the vegetation on site can potentially and substantially create other risks including fire and subsequent mudslides.

It is unfair that the burden of landslide mitigation be focused on the natural areas rather than on problematic infrastructure.

It is obvious to anyone who is a passenger riding westward along Palos Verdes Drive South that the road itself functions as a large dam blocking outflow of the canyons to the ocean. Why was this condition not specifically discussed in the FS? Realistically, it seems that the road itself is the cause of many of the problems. Shouldn't there at least be some attention paid to how that might be addressed?

Hydro-augers may be a reasonable design option to address the damming effect of Palos Verdes Drive South.

However, more biological data is needed to fill the biological “Data Gaps” regarding the take up and transpiration of water by locally native coastal sage scrub and grass species before proceeding with other technological designs, especially any considerations of lining any of the canyons.

Appendix B

Excerpts from our letter dated December 15, 2019:

Thank you for the opportunity to review the design drawings and hydrologic analysis associated with the Portuguese Bend Landslide Mitigation Project. Although there have been only a very few days to review the analysis and plan, we do have the following preliminary comments:

CEQA Review

Project Goals for CEQA evaluation

Two additional Project Goals should be added before CEQA review - that of restoring water drainage to a natural state as much as feasible and minimizing the visible engineering structures as much as possible.

Request for Alternative Plan

Please defer the assignment of CEQA review for this project proposal until an additional Alternative Plan or Plans from a different consulting company can be simultaneously reviewed in the CEQA process. The Alternative Plan(s) should focus on the removal of blockages to natural drainage in the Portuguese Bend area, both at the canyon inlets and at outflow to the ocean, which is currently dammed by Palos Verdes Drive South.

Discussion

We are requesting a broadened set of goals for this proposed project and an Alternative Plan to be simultaneously reviewed in the CEQA process for the reasons discussed as follows. For a project of this scope and expense it seems only prudent and reasonable to obtain a Second Opinion. Every consulting firm has its own set of skills and expertise, and its own point of view regarding recommended approaches to problem solving. In this case, while aspects of the design have been modified in response to public and city concerns, some variation of engineered swales, hydroaugers and filling of fissures have remained as the recommended actions to address the landflow. The menu of remediation options to be considered has thus always seemed to be limited.

It seems to us that all of the options that have recently been under consideration are workarounds that fail to address the existing blockages of natural water flow which are causing inappropriate flow to subsurface areas as well as ponding of water.

These blockages are:

- (1) At the inflow to the natural canyons (which we understand to be around Burma Road)
- (2) At what should be the outflow to the ocean, which is dammed by Palos Verdes Drive South (PVDS)

It concerns us that instead of restoring what was once a natural dispersion of water drainage divided between several canyons, the current proposal would instead funnel all of that water into a single concentrated flow, which because of its large volume and velocity will require a very large detention basin ("Flow Reduction Area") before being directed out into a single pipe to the outflow. We worry that should any part of that proposed system fail at any time in the future, we may have a far worse problem than we do today.

There needs to be additional analysis and an Alternate Plan for CEQA evaluation that would focus on remediating the existing blockages at the canyon inflows and outflow to the ocean in order to restore a more natural water flow and drainage. It seems to us that current technology allows for sophisticated 3-dimensional mapping that was not feasible years ago. Could such mapping be used as a baseline for analysis showing the current water flow pathways, an estimate of what they might have been prior to blockages, and a recommendation of how water flow might be improved towards a more natural state at this point in time?

We wonder whether some focused re-grading (in a limited area) might be an option to restore natural water flow, and whether a cut-and-fill approach might be considered to remediate inappropriate elevations and fill existing fissures. Certainly we would not wish to see this become a massive re-grading project, however we think it is worth asking if such an approach on a very limited and concentrated scale might be helpful, and perhaps even more economical than the current proposal.

Determinations regarding the possibility of restoring natural drainages are likely to be complex and to require specialized expertise. Therefore, it may be better to hire an independent geological consulting firm for this analysis rather than solely rely on the CEQA process itself.

Concerns regarding the currently proposed plan

Filling of fissures

1. Would the filling of existing fissures with a solid material (such as the proposed fly ash/concrete or any other concrete-like filling) be, in effect, the insertion of a permanent wedge of solid material separating the land masses? Would the surrounding soil then be inclined to pull away from that wedge of fill, reopening a fissure again and requiring constant maintenance to refill in order to avoid inappropriate water penetration at those previously filled fissures?

2. Might fissures close as well as open? If so, a solid wedge would seem to prevent that.

3. Would it not be better to fill the fissures with native soil and allow native vegetation to recover across those fissures so that the root network would help to integrate, join and hold the soil masses together?

4. What is the use of filling fissures if the surface flow of the water has not yet been improved?

5. Fly ash is fine powdery material from burning coal, which was captured by filters and would otherwise have been smoke, polluting the air downwind. Its use in concrete is viewed favorably by the coal industry, as a way to get rid of its waste product. Coal is no longer burned in power plants in California, so this material would need to be transported from another state. Although we are aware that the EPA has ruled that fly ash is safe to use in building materials, we remain concerned about its use in direct contact with water and soil within a natural landscape.

Although its primary components may be "inert" as claimed in the Staff Report, fly ash typically contains toxic elements which were present in the coal that was being burned. These include but are not limited to arsenic, lead, barium, selenium, mercury, boron, and thallium, according

to the Electric Power Research Institute (CP-INFO Database. EPRI: August 5, 2009. Accessed at https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/oira_2050/2050_meeting_101609-2.pdf)

For “Flowable Fill”, 95% fly ash is the highest concentration discussed in a document “Fly Ash Facts for Highway Engineers”, but this proposal mentions a concentration as high as 97%, which would seem to provide very little encapsulation of the fly ash and thus little protection against leaching of contaminants.

Contamination could be leached into the ground water or soil with detrimental effects on vegetation, soil biota, and downslope water quality including ocean ecosystems. Testing should be done on any fly ash designated for use in this project before any injection or installation occurs to determine whether hazardous concentrations of toxic elements would be leached out.

Aesthetics

The primary function of the Nature Preserve is to provide habitat for the plants and wildlife which make up the local ecosystem. However, human appreciation and enjoyment of the natural landscape is also a big part of its value. The natural slopes and vegetation of the Preserve are highly valued by the public. One only needs to be aware of the vast number of photographs and artwork depicting these lands to realize how important that aesthetic value is to many people. It is disconcerting to visualize an overlay of a vast network of drainage infrastructure on that landscape. Just as the public values the "undergrounding" of utility lines, the public would not want to see the intrusion of drainage infrastructure as a visual blight on the Preserve.

Data Gaps

It would be desirable to see a 3-dimensional mapping of the land and geologic contours and the associated water flow. The consultant has pointed out that, since the movement of the landflow is ongoing, it is difficult to pinpoint critical locations of water presence and that data from borings could be "off" by as much as 100 ft. (p. A12). Such a discrepancy will require additional investigations (with associated costs) prior to and during construction and could result in a trial and-error approach that ends up with significantly greater cost, and greater impacts to habitat areas than originally anticipated.

Future Maintenance Requirements

The consultant states that the proposed project will not stabilize land flow, but is likely to "reduce movement rate" by some undefined amount. This caveat implies that ongoing maintenance of PVDS roadway and sewer lines through the Portuguese Bend will continue to be necessary. Therefore, it is not reasonable to assume or speculate that such costs will no longer be incurred by the city once the project is completed.

In addition to the ongoing maintenance of PVDS, maintenance of the various landflow mitigation components would also be required, which must be factored into the overall costs of this project. For example, the consultant recommends increasing the frequency of monitoring of land movement to monthly rather than annually.

The drainage swales themselves would require regular maintenance. It should also be noted that any disturbed areas adjacent to the swales (including access roads and staging areas)

would be vulnerable to infestation with problematic invasive non-native vegetation such as mustard. Methodology to control such vegetation needs to be defined, particularly considering both the presence within the Nature Preserve and that the outflow leads directly to ocean ecosystems.

It is not clear whether the access roads used for construction are intended to be left permanently for maintenance.

Detention Basin ("Flow Reduction Area")

The proposed detention basin is quite large, and is likely to be a dominant and discordant visual feature imposed on the landscape.

What would the anticipated weight of the detention basin be at maximum capacity? Might this added weight potentially trigger any additional land movement?

Outflow to ocean

The current proposal calls for a single large outflow to the ocean at the location of the existing outflow pipe. The Staff Report states that "it originally was recommended that four additional 60-inch pipes under PVDS, extending to the ocean, be constructed in order to adequately convey the quantity of stormwater runoff associated with a 100-year rainfall event." That option was apparently rejected by the city because of unspecified costs and environmental impacts.

The public deserves to see the details and analysis of those costs and environmental impacts in order to have a comprehensive understanding of the range of options available to address the landflow challenges.

Conclusion

Thank you for your attention to these concerns. Again, we request that an Alternative Plan which focuses on the removal of blockages and restoration of natural drainage be developed and added to the CEQA evaluation. The Goals of restoring natural drainage to the extent possible and minimizing the visibility of drainage infrastructure should also be added to the project as a baseline for the CEQA review. Please also consider the additional concerns regarding the current proposal that we have mentioned above.

Appendix C

Excerpts from PVPLC letter dated November 14, 2019:

Flowline Modifications: We have concerns that lining streambeds and swales with plastic geo webbing, rubble rock, and in some areas, concrete, will be immensely damaging to the landscape. While it is conceivable that plants may take root among the geo-webbing and rock material, it is likely the surrounding landscape vegetation will suffer from reduced access to the seasonal streamflow that spreads out across the alluvial fans at the bottom of the canyon areas should they be channelized. Surrounding vegetation could be exacerbated by drought stressors resulting in die-off, invasion of non-native plants, and increased fire risk. We also urge that the use of concrete be eliminated or critically reduced to preserve the natural integrity of the land.

Kelene Strain

From: Ron Dragoo <RonD@rpvca.gov>
Sent: Wednesday, December 9, 2020 8:15 AM
To: Kelene Strain
Cc: Ramzi Awwad
Subject: FW: Landslide Mitigation Project. Re: No quality infrastructure, no quality City. Fwd: Unfinished business

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Ron Dragoo, PE
Principal Engineer

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From: SUNSHINE [mailto:sunshinerpv@aol.com]
Sent: Tuesday, December 8, 2020 4:09 PM
To: Ramzi Awwad <rawwad@rpvca.gov>
Cc: CC <CC@rpvca.gov>; CityClerk <CityClerk@rpvca.gov>; imac <imac@rpvca.gov>; PC <PC@rpvca.gov>; EPC <EPC@rpvca.gov>; Trails <trails@rpvca.gov>
Subject: Landslide Mitigation Project. Re: No quality infrastructure, no quality City. Fwd: Unfinished business

Hello Mr. Awwad,

Thank you for the position statement. It helps me to clarify the unfinished business.

I wrote: PS: Just about every storm drain repair project should leave behind an improved trail and/or roadside.

You wrote: This is to assure that the EIR is comprehensive with respect to the potential impacts of the items included in the eventual landslide mitigation work. (Emphasis added.)

The difference is that Staff is to produce "holistic solutions". That term is not in the General Plan however, the principle is clearly spelled out. For the past 20 years, Staff has been proposing isolated

projects without much public comment on the Scope of Work. Combining all interests at a location into one design is clearly the most cost-effective way to get the desired/needed work done.

The proposed landslide mitigation work does not include the "items" which became the City's responsibility to engineer/design/draft as an amendment to the Trails Network Plan, each time they acquired a parcel of land. Creating the Reserve Trails Plans has not addressed the maintenance and the Fire Department's requirements as to trail development CRITERIA.

Here is a list of interests/impacts which could be accommodated/mitigated as additions to the proposed landslide mitigation work. Their "eventual work" needs to be addressed in one comprehensive EIR, now.

1. Owner of property which is adjacent to the PV Preserve.
2. Owner of property which is impacted by the Landslide Moratorium.
3. Owner of property which is in jeopardy due to the lack of "hazard mitigation".
4. Owner of property which is in jeopardy due to the lack of "wildfire management".
5. Owner of property which is in jeopardy due to the lack of erosion/flood control.
6. Owner of property which is Zoned Equestrian and not accommodated accordingly.
7. Owner of property which is burdened by restrictions in the NCCP.
8. Owner of property which is adjacent to an RPV park site.
10. Public trail network user/advocate.
11. RPV park site user and improvement advocate.
12. Coastal Zone visitor and ocean view advocate.
13. "Pure" habitat advocate.
14. "Structured" recreation facilities user/advocate.
15. Resident without adequate emergency evacuation options.

You might as well start now with expanding your list of stakeholders because the general public is most of them. I commend IMAC for taking special interest in this project. Ron Dragoo should have introduced the "big picture", long ago. He has not responded to my concerns about the boundary of the Project Site, either.

Are you simply going to gather comments until January 15 or, are you going to get to work on covering the missed bases? I would rather be a help than continue to be a nag, whistleblower, pest.

Sincerely,

SUNSHINE

Archivist for the Palos Verdes Loop Trail Project

310-377-8761

PS: Have you read the Introduction (4 pages) of the current Conceptual Trails Plan (CTP 1993), yet? My offer of a tutorial on the whole Trails Network Plan still stands.

In a message dated 12/7/2020 5:47:45 PM Pacific Standard Time, rawwad@rpvca.gov writes:

Hello SUNSHINE,

As I mentioned earlier, I have toured the Portuguese Landslide area and have an appreciation of the lay of the land. The December 19, 2020 EIR Scoping Meeting for the Portuguese Bend Landflow Mitigation Project is an opportunity for stakeholders and the general public to provide their input on what should be included in the EIR. This is to assure that the EIR is comprehensive with respect to the potential impacts of the items included in the eventual landslide mitigation work. I will also take this opportunity to note that comments will be accepted before, during, and after the scoping meeting- until January 15, 2021 at 4:30pm.

With respect to identifying big, small, and specific projects in the Public Works Budget priorities; staff has not yet started work on developing the Capital Improvement Plan, but it will most certainly be vetted through IMAC.

Thanks,

Sincerely,

Ramzi Awwad

Deputy Director of Public Works

30940 Hawthorne Blvd.

Rancho Palos Verdes, CA 90275

310-544-5275 (telephone)

rawwad@rpvca.gov

www.rpvca.gov

From: SUNSHINE <sunshinerpv@aol.com>

Sent: Saturday, December 5, 2020 9:37 PM

To: Ramzi Awwad <rawwad@rpvca.gov>

Cc: CC <CC@rpvca.gov>; CityClerk <CityClerk@rpvca.gov>; imac <imac@rpvca.gov>; PC <PC@rpvca.gov>; FAC <FAC@rpvca.gov>

Subject: No quality infrastructure, no quality City. Fwd: Unfinished business

Hello Ramzi,

Please, please, please come see the lay of the land which this Legacy of RPV revolves around. Ken Dyda, Barbara Ferraro, Carolynn Petru, Ara Mihranian, Matt Waters and Ron Dragoo are the only ones left on the "inside". There are a whole lot of people on the "outside" of City Hall who are experiencing a degradation of the infrastructure which the RPV General Plan of 1975, shall we say, promised us.

As our new Deputy Director of Public Works, it falls to you to sort out what is in the mid-year adjustments to the FY 2020-21 Budget. I now know where the gaps are. It all comes down to following the money and even our new Director of Finance is pointing at you. I have a BS

in Business Administration. More importantly, I am a Facilities Designer and Construction Project Manager (retired), not just a Trails Junkie.

The next "debacle" is the Portuguese Bend Landflow Mitigation Project. Ask Ken Rukavina, PE, how to approach the December 19, 2020 EIR "Scoping Session" as though it was a new Application which requires a Conditional Use Permit (CUP). "We, the People" are the Client. Public Works is our Professional Representative.

Besides me, who has a grip on the RPV General Plan, the RPV Coastal Specific Plan, the RPV Parks Master Plan, the RPV Trails Network Plan and the RPV Natural Communities Conservation Plan? Think of it from the grass roots up... When the Sanitation Districts finish their latest work on the sewer lines, which may or may not be in the PV Drive South Public Right of Way, will trail C9 be any closer to meeting the current "Easy", pedestrian/equestrian "Standards"? What does the draft TNP Update propose, TYPE ? for each of the three separate corridors for the California Coastal Trail?

If Public Works doesn't design it, Community Development, Rec.& Parks and Finance can't/don't support it. Parking and public access to the PV Preserve (Dec. 15 Council Agenda Item ?) is just a smoke screen.

I am inviting you to identify some big, small and specific projects which need to be in the Public Works Budget priorities. Give IMAC a chance. ...S 310377-8761

From: SunshineRPV@aol.com
To: rayh@rpv.com
Cc: clehr@rpv.com, cc@rpv.com
Sent: 12/10/2009 1:22:33 AM Pacific Standard Time
Subject: Unfinished business

Hi Ray,

Would you please pull another rabbit out of your hat for the other end of the Sol Vista Trail? After all you went through to fix the north end, it seems a shame that RPV has managed to destroy the south end.

Siamak Motahari has the drawings (Site Plan, Elevation and Sections) for a little Sutter wall. A "challenging" trail will be just lovely for recreation and emergency evacuation on foot. We shouldn't have to wait for the City to come up with \$400,000. to make it "easy" as opposed to "wiped out" which is how the Sunnyside storm drain project left it.

Care to take a hike, Rockinghorse Road to Deadman's Curve? I can arrange for a 78 year old escort. ...S

PS: Ron Dragoo doesn't seem to understand that he doesn't need to have the underlying property owner's permission to make improvements on a City trail easement. And, Larry Still didn't seem to understand that a big, dead pine tree across a City trail easement within 200 feet of a home is a fire hazard.

May 21, 2008

MEMO from Sunshine

TO: Carolyn Lehr

RE: Trail at 2477 Sunnyside Ridge Road

Just a question.

RE: That one "it was there and then it was lost" 30 feet of the Palos Verdes Loop Trail at 2477 Sunnyside Ridge Road.

Since it is not getting anywhere on the infrastructure priority list, why not put at least the cost of the Soils Engineer and the Structural Engineer into the budget for PV Drive East safety? ...S

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When we had an interim Director of Public Works, he figured out that getting the City Council to change the designation of A29 from "easy" to "challenging" was all it took to be able to build a narrower trail tread. I still have no clue where he got the money. However, if you park at the entrance to Larga Vista at PV Drive east, (ask Carolyn Petru to be your guide), you will find a perfectly lovely trail.

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The opinion which I have been expressing for more than four years is that the City should have access to some sort of Errors and Omissions insurance fund to fix this sort of error. Staff submitted to the Rec & Parks Committee, the Planning Commission and the City Council inaccurate documents which referred to the easterly ten feet of 2477 Sunnyside Ridge Road as "flat". Well, **it is not flat**.

The application for the California trails grant is an exaggerated SWAG. The plan that Jim Bell has in his hands was designed by professionals. It considers the preferences of both the neighboring homeowners and the trail users. It is a shame that Figure 22 in the City's General Plan is titled "conceptual" because all of them were physically in use back then.

The City received money from the sale of this Right of Way. The City really should come up with the money to design a legitimate restoration of this critical, non-motorized emergency and recreational connection. ...S

PS: Just about every storm drain repair project should leave behind an improved trail and/or roadside.

Kelene Strain

From: Ron Dragoo <RonD@rpvca.gov>
Sent: Wednesday, December 9, 2020 8:14 AM
To: Kelene Strain
Subject: FW: Relevant to current City projects. Fwd: Public Service Announcement: Residential Burglaries

Kelene, I am forwarding an email that may be relevant to the PB Landslide EIR scoping meeting.

Ron Dragoo, PE
Principal Engineer

In light of COVID-19 response measures from the Governor of the State of California and the Los Angeles County Public Health Department, the City of Rancho Palos Verdes will only be providing Essential City Services that are necessary to protect the health, safety, and welfare of our community and City Employees. To facilitate these measures, all non-essential staff will be working remotely. Inquiries will be reviewed daily and will be responded to on a case-by-case basis. Please note: our response to your inquiry could be delayed. Thank you for your understanding.

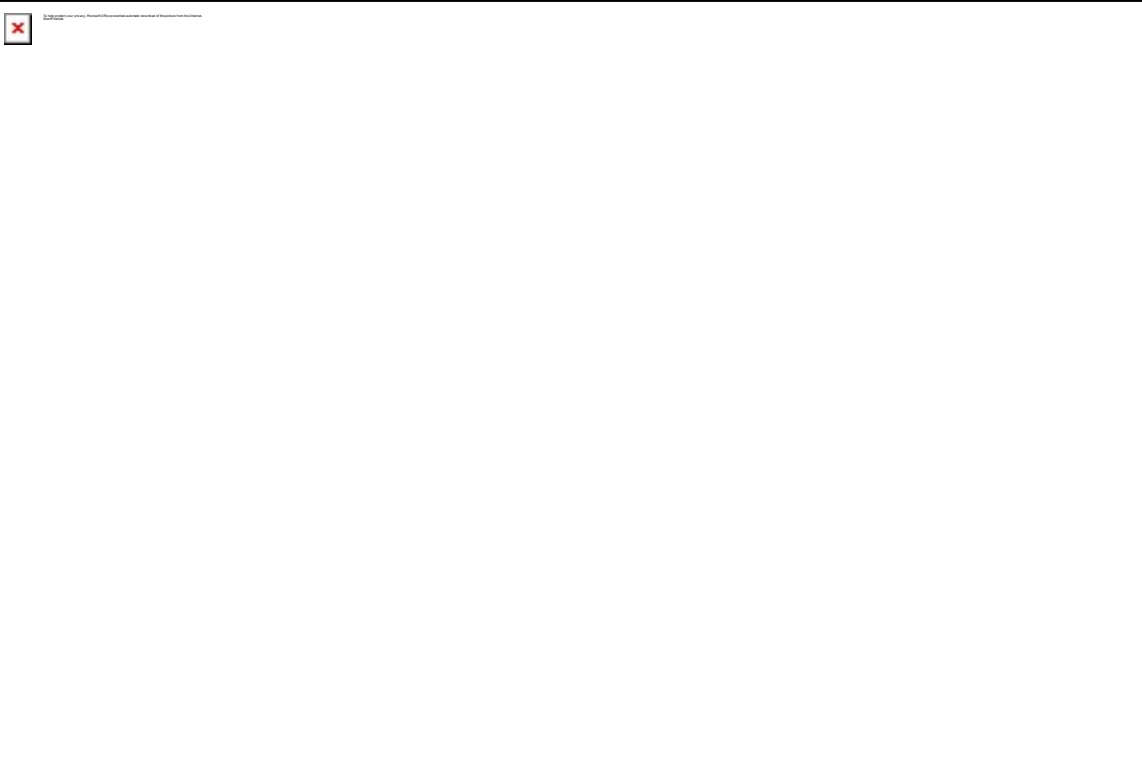
From: SUNSHINE [mailto:sunshinerpv@aol.com]
Sent: Tuesday, December 8, 2020 6:27 PM
To: Ramzi Awwad <rawwad@rpvca.gov>; Matt Waters <MattW@rpvca.gov>; Jesse Villalpando <jvillalpando@rpvca.gov>
Cc: imac <imac@rpvca.gov>; EPC <EPC@rpvca.gov>
Subject: Relevant to current City projects. Fwd: Public Service Announcement: Residential Burglaries

Hello Ramzi and Matt,

Please add this concern to the list of impacts which when mitigations are designed in the Landslide Mitigation Project may have environmental impacts to be mitigated.

The future of the Gateway Park property is still a mystery. So many different land uses are within the Project Site. Even IMAC now has separate subcommittees. Is there one human being who is going to facilitate all the needed public input in order to come up with a holistic and long term schematic for the EIR to cover? ...S 310-377-8761

From: listserv@civicplus.com
To: sunshinerpv@aol.com
Sent: 12/7/2020 1:01:54 PM Pacific Standard Time
Subject: Public Service Announcement: Residential Burglaries



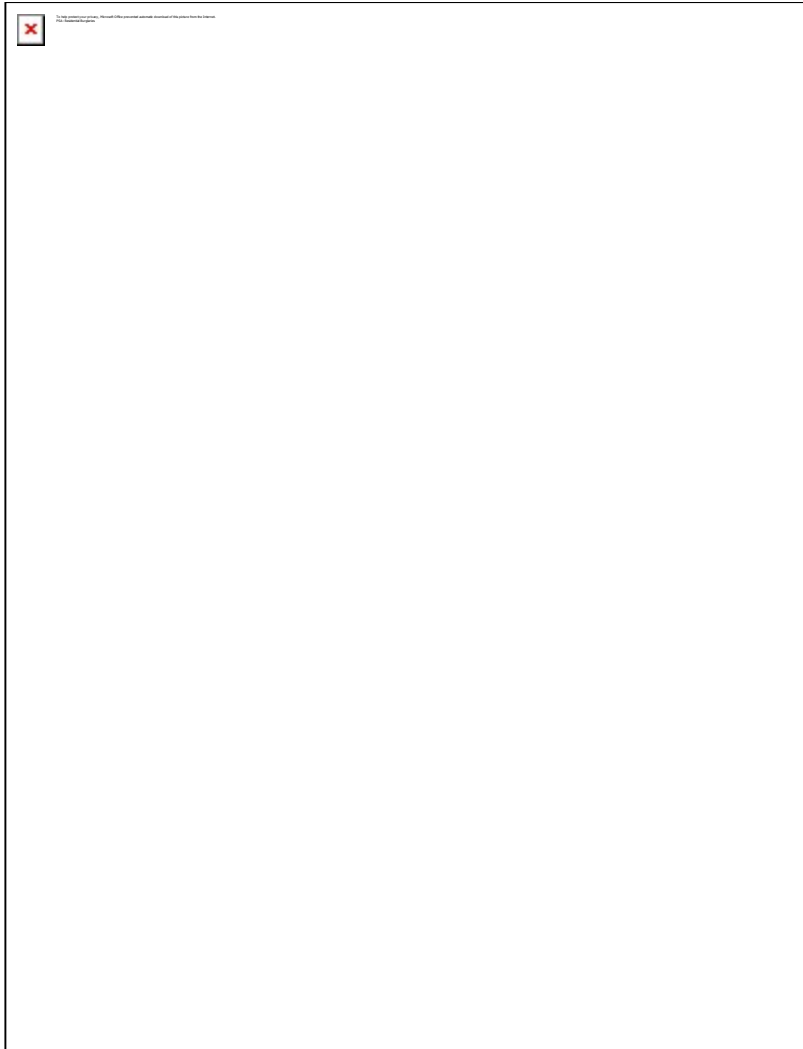
Public Service Announcement: Residential Burglaries


The Lomita Sheriff Station's Surveillance Apprehension Team (SAT) has been actively investigating residential burglaries throughout the station's reporting districts, particularly at homes that back up to trails, golf courses, or open areas.


With the holidays approaching, the risk of such crimes increases. Tips on preventing burglaries include:


- See something, say something.
- Communicate with neighbors and let them know if you'll be leaving town.
- Make your residence appear like you are home such as putting lights on timers.

If you see suspicious activity or persons, contact the Lomita Sheriff's Department at 310-539-1661, or 9-1-1 if it is an emergency.



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From: Ron Dragoo <RonD@rpvca.gov>
Sent: Wednesday, December 9, 2020 8:17 AM
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From: [SUNSHINE](#)
To: [Ron Dragoo](#); [PublicWorks](#); [Trails](#); [Ramzi Awwad](#); [Katie Lozano](#)
Cc: [CC](#); [CityClerk](#); [Jesse Villalpando](#); [Karina Banales](#)
Subject: Funding for the Update on Portuguese Bend Landslide Mitigation Project
Date: Monday, November 16, 2020 3:38:57 PM

Hi Ron,

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From: [SUNSHINE](#)
To: [Eric Alegria](#); [David Bradley](#); [Ken Dyda](#); [Barbara Ferraro](#); [John Cruikshank](#)
Cc: [imac](#); [PC](#); [EPC](#); [TSC](#); [Ramzi Awwad](#)
Subject: Dec.19 EIR Scoping Session. Are you going to just sit there and take it?
Date: Saturday, December 19, 2020 6:29:24 PM
Attachments: [The PositionPaper 07-04-12.pdf](#)

Dear Mr. Mayor and Council,

Thank you for your time. Once again, Staff has arranged for the Council and the public to have no influence on what happens, next. You have already funded this Consultant's Scope of Work.

1. Consideration and possible action to receive public comments on environmental issues to be addressed in the Environmental Impact Report (EIR) for the Portuguese Bend Landslide Mitigation Project. (Razepoor/Dragoo) (120 mins)
Recommendation: Open the public hearing and receive public comments regarding environmental issues to be addressed in the Environmental Impact Report (EIR) as stated in the Initial Study for the Portuguese Bend Landslide Mitigation Project.

Although your comments and questions were enlightening to me about a lot of things, the only action you could take was per the published Agenda Item description. Sit and listen. While we sit and wait for many months for the Consultant to do whatever they have been hired to do (like today's Scoping Session, "public participation" is just a line on a Power Point slide), I am looking for a way to actually get some well-designed, physical work done around here in a timely and cost-effective manner.

Per your request that public speakers refrain from "Staff bashing", my suggestions are aimed at getting around what they are not getting done. My highest priority is to get our unpaved roadsides and off-road (emergency) circulation corridors documented in such a way that IMAC can prioritize the maintenance and Capital Improvements Budgets.

This is going to take a proactive stance from Council when you reassess the Citizen Advisory Committee's work assignments, next month? What we seem

to be missing is a Citizen Advisory Committee or Subcommittee, assigned to initiate/review the proactive implementation of each of our City Council Approved Plans. Council keeps approving them and they are often never seen, again. I could not find a list of them all on the City's web site. As a citizen, I will keep working on that

The Planning Commission reviews some of the projects initiated by private property owners. The administrative approval of ADU's and Junior ADU's is just a drop in the bucket compared with all now approved by the Director of Public Works, the Director of Community Development and the Building Division. Nobody is availing themselves of the public's expertise when it comes to defining the Scope of Work for City initiated projects. The public's requests for review of all sorts of suggestions have no avenue to a Citizen Advisory Committee.

IMAC's response to the PB Landslide Mitigation preliminary engineering was quality work. Please build on that effort to get more of the same in the earlier stages of Staff's proposals. This is something you can actually do while the Committees' work is on your agenda.

Thank you again for your interest in the future of the City of RPV. ...S

PS: Attached is the reminder about how we could be going about creating a balance between our human communities and our "natural" communities.

From: [SUNSHINE](#)
To: [Ron Dragoo](#); [PublicWorks](#); [Trails](#); [Ramzi Awwad](#); [Katie Lozano](#)
Cc: [CC](#); [CityClerk](#); [Jesse Villalpando](#); [Karina Banales](#)
Subject: Funding for the Update on Portuguese Bend Landslide Mitigation Project
Date: Monday, November 16, 2020 3:38:57 PM

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From: [SUNSHINE](#)
To: [Ron Dragoo](#)
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Subject: ... you can't fool all of the people all of the time. Re: Portuguese Bend Landslide Mitigation Project
Date: Tuesday, November 17, 2020 1:54:41 PM
Attachments: [image003.jpg](#)
[image004.jpg](#)
[image001.jpg](#)
[image002.jpg](#)
[~WRD0000.jpg](#)

Dear Mr. Dragoo:

The Circulation Element of the RPV General Plan speaks to infrastructure.

Thank you for your reply. You wrote: **"...as you know, the Trails Network Plan is a draft plan, accordingly this plan is not funded."**

You and I both know that this is a bold-faced lie just like all of your previous assurances that existing, Category II trails would be enhanced as a part of the bigger Public Works Projects you were managing.

The Trails Network Plan (TNP) was Adopted on November 27, 1984. The Conceptual Trails Plan (CTP) was written by a citizen committee to assist Staff with identifying opportunities to negotiate/budget such enhancements. The City Council Adopted it on January 22, 1990 as an insertion into the primary Trails Network Plan. On November 7, 2012, the City Council directed that the TRAILS DEVELOPMENT / MAINTENANCE CRITERIA of July 4, 2012 be inserted into the primary Trails Network Plan. **That is fact.**

The CTP also identifies the trails which the Public Works Department is responsible for maintaining. Just because you are a lowly Staff Engineer doesn't mean you are free to support the poor business practice of not requesting funding to do the work that the City's General Plan directs. (And I do mean the updated version.)

Now is the time in the Budget Cycle for you to step up and ask for the Staff Time for **you** to coordinate with the Fire Department, the public and the PVPLC to draft the updates to the "narratives" of the trails which fall within the PORTUGUESESE BEND LANDSLIDE MITIGATION PROJECT SITE. Only then will the Draft Environmental

Impact Report legitimately consider the future land use of this City owned property, particularly hazard mitigation.

Katie Lozano now has the Consultant's draft of the TNP Update. The Consultant's contract is somewhat vague as to exactly which documents are to be inserted and how the Council's Policy decisions of 2012 are to impact the CTP's individual trail "narratives". Your choice. Since the draft has not been "vetted" by the public and is not likely to have been before your December 19, 2020 PUBLIC SCOPING MEETING, you are stuck with presenting the draft update or **implementing the existing TNP/CTP** plus the CRITERIA in relation to defining the "probable environmental effects of the project, which will be addressed in the EIR for this project".

As always, I am available to help with nurturing the City's "corporate memory". I appreciate the opportunity to ferret out Staff's potential errors and omissions before they turn up at public meetings. I can't help if you insist on being... What's the new "buzzword" for Trump? ...Arrogantly stupid.

You can fix this. I look forward to hearing from you with such an opportunity before I compose my official comments. ...S 310-377-8761

In a message dated 11/16/2020 6:03:34 PM Pacific Standard Time, RonD@rpvca.gov writes:

Sunshine, thank you for your comments, I appreciate all the input received from residents and concerned citizens. You are welcome and encouraged to participate in the planned December 19, 2020 meeting. Funding for this portion of the Portuguese Bend Mitigation Project (Environmental Review) has been included in the budget this fiscal year, and as you know, the Trails Network Plan is a draft plan, accordingly this plan is not funded. Thank you again for your comments.

Ron Dragoo, PE

Principal Engineer

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[Directory](#) on the City website.

From: SUNSHINE <sunshinerpv@aol.com>

Sent: Monday, November 16, 2020 3:38 PM

To: Ron Dragoo <RonD@rpvca.gov>; PublicWorks <PublicWorks@rpvca.gov>; Trails <trails@rpvca.gov>; Ramzi Awwad <rawwad@rpvca.gov>; Katie Lozano <KatieL@rpvca.gov>

Cc: CC <CC@rpvca.gov>; CityClerk <CityClerk@rpvca.gov>; Jesse Villalpando <jvillalpando@rpvca.gov>; Karina Banales <kbanales@rpvca.gov>

Subject: Funding for the Update on Portuguese Bend Landslide Mitigation Project

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Dear Rancho Palos Verdes City Council Members:

As a hiker, equestrian and homeowner in the Portuguese Bend community, I am writing to express concern over the impacts of the Landslide Mitigation Project as well as the parking and access projects. I am a resident hiker and horse owner for the last 30 years. During this time I have seen a loss of trails and a decrease in common sense and good manners by many trail users.

Encircled as we are by the nature preserves and the public trail systems on all sides, each proposed project, while possibly worthy, impact us all. Each project encroaches on current trails, habitat and public health by bringing more people to less and less space. The project mitigation plans do not address the impact on the horse community and those who wish to continue to recreate safely on the trails. In 1984, the city approved The Trail Network Plan to enhance and maintain the trails. **City staff were directed to watch for opportunity to enhance the trail network where other projects are proposed and initiated by staff.** The plan included the need for disaster evacuation, firefighting access and other emergency preparedness concerns. The Palos Verdes Loop trail has already been disrupted. Due to erosion and lack of maintenance, new ways of getting through were created by trail users who then encroached on private property, which was later closed off. These factors have led to the loss of full segments of the trail network.

We ask that while you plan both the parking and landslide mitigation projects, as well as any future projects, you follow the already adopted Trail Network Plan and look to enhance the trail network at every opportunity. This includes engineering permanent trail routes, canyon crossings, erosion control and access to trails from the Portuguese Bend Community. Access to Jack's Hat and Three Sisters is now at risk, dependent on property owners and conservancy to make a deal. This too puts more people on fewer trails which affects us all, the habitat and public safety. **Please include the 1984 Trails Network plan in your plans. Mountain bikers and horses need to be separated for the safety of both.**

Sincerely,

Joan Taylor

30615 Palos Verdes Drive East

Rancho Palos Verdes Ca 90275

310-514-9077

Enyssa Momoli

From: Teresa Takaoka
Sent: Friday, December 18, 2020 11:06 AM
To: Enyssa Momoli
Subject: FW: Please preserve access to the Portugese Bend Reserve

Late corr

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

From: Brian Thompson <brianthompson3@gmail.com>
Sent: Monday, December 14, 2020 11:23 AM
To: CC <CC@rpvca.gov>
Subject: Please preserve access to the Portugese Bend Reserve

Palos Verdes City Council,

The Portugese Bend Reserve is one of the most beautiful outdoor spaces in the county of Los Angeles and it's access to all residents needs to be protected.

Please, I beg of you, protect meaningful access to this beautiful outdoor public space. For our children, and future generations, we need this meaningful access to be protected.

Thank you,
Brian Thompson

Dear Rancho Palos Verdes City Council Members:

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Sincerely,

Lisa Wolf

Kelene Strain

From: Nasser Razepoor <nrazepoor@rpvca.gov>
Sent: Thursday, December 17, 2020 10:41 AM
To: Kelene Strain
Subject: FW: Portuguese Bend Landslide Project

Please see email below.

Thanks,

Nasser Razepoor, PE
Associate Civil Engineer
Department of Public Works
[City of Rancho Palos Verdes](#)
30940 Hawthorne Blvd.
Rancho Palos Verdes, CA 90275
Tel: 310-544-5307
Fax: 310-544-5292



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From: sharon yarber <momofyago@gmail.com>
Sent: Saturday, December 12, 2020 1:51 PM
To: PublicWorks <PublicWorks@rpvca.gov>; Katie Lozano <KatieL@rpvca.gov>; CC <CC@rpvca.gov>
Subject: Portuguese Bend Landslide Project

Dear Members of the IMAC,

Thank you for your service to the community and your excellent and comprehensive report.

I wish to express my support for the position you have taken that the first order of business should be to install the hydraugers and determine their efficacy before expending large sums of money on other measures which, without effective underground water extraction by the hydraugers, will not be particularly successful. I hope the City Council listens to your recommendation!

I also encourage you to vigorously promote efforts by the City to engage with Rolling Hills to eliminate septic systems that surely contribute to the landslide problems.

Please include this email as late correspondence for the meeting on December 14th.

Sharon Yarber

Dear Rancho Palos Verdes City Council Members:

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Sincerely,

A handwritten signature in cursive script that reads "Grace Yung".

Grace Yung

Landslide Mitigation, IMAC EIR Scope comments

19 December 2020.

The following comments are provided by the IMAC and complement the IMAC Landflow Report included in the agenda items.

1. Geographic scope.

1.1. Expand the project boundary to provide a margin of 180 feet along the easterly (up-slope) side of Burma Road Trail. (Portuguese Bend Mitigation Project, Nov. 2020, Chambers Group, Section 1.2, p. 5 and Figure 1, Project Site Location)

Reason: This will include existing retention/catch basins in Paintbrush, Ishibashi and Portuguese Canyons that lie up-slope to the east of Burma Road Trail. Burma Road acts as a dam to some extent for these canyon retention/catch basins. The proposed expansion of the boundary also will include land fissures on and adjacent to Burma Road.

1.2 Clarify/expand the project location boundary on the north-west to conform to the limits of the Portuguese Bend watershed as depicted in the Geo-Logic hydrology report, Drawing 1, plus a margin of plus 100 feet for uncertainties in the watershed delineation. Reference Portuguese Bend Landslide Mitigation, Chambers, Nov. 2020 ("Chambers 2020-11") Section 1.2 and Figure 1. (Hydrology and Hydraulics Evaluation, Geo-Logic Associates, December 9, 2019, Appendix C, City Council page A-76, Attachment 1, Hydrology Map) (See also Chambers, Figure 7, Hydraulics Locations, location A3.)

Reason: The northwest boundary lies in an area of complicated geology located between the currently existing outflows of middle Portuguese Canyon and the Kelvin Canyon tributary to Altamira Canyon. There are unresolved issues concerning the possible existence of important water transfer underground between what appear at the surface to be separate canyon watersheds. The expanded 100-foot margin will allow investigation whether water infiltrating from storm run-off in this expanded area might intrude underground into the landslide either above or below the basal rupture surface of the landslide. This margin will allow the project to address potential sources of artesian water originating at higher elevations that could possibly be extracted by horizontal hydraulics or wells. (See, for example,, Geo-Logic, December 2019, Section 5.6.1, Sub-phase IIIA-Confirmatory Exploration and Instrumentation, council page A-20.)

2. Hydrauger Implementation

Include alternative phasing (timing sequence) of construction. Installation of “down-gradient ‘relief’ drains” currently is proposed only in Phase III, sub-phase C, construction. That is, the hydraugers are to be installed near the end of all other construction such as fissure filling and installation of surface-water run-off controls. (Reference Chambers, 2020-11, Sections 1.3 and 1.4, pp. 11 – 12.) [Geotechnical Evaluation Report, Geo-Logic Associates, December 2019, section 5.6.3, page 17 (Council agenda page A-21). (Geo-Logic Report of 12-2019)] Include within the EIR scope an alternative Phase 1 construction for installation of a limited number of prototype directional hydraugers from the sea shore into the lower landslide to test/verify the viability of the directional hydrauger concept. Advance to Phase I some of the confirmatory exploration and instrumentation, currently specified in section 5.6.1 of the Geologic Report of 12-2019. A similar concept appears in Geo-Logic Report, 12-2019, appendix C, council page C-63 (“In addition, remedy construction is proposed to be completed incrementally and iteratively starting with a pilot test program for directional subsurface drains.”)

Reason: Directionally drilled hydraugers have never before been tried in the Portuguese Bend landslide. The consultants evaluate them as the largest contributor to stabilization of the landslide. (Geotechnical Report, Geo-Logic Associates, December, 2019, page s 12 – 13, Council pages A-16 – A-17, including Table 1, estimated factors of safety.) However, their effectiveness is uncertain and the consultants have stated that finding this high-pressure water will be a trial and error process. These hydraugers are high risk and high reward. Prudent risk management concludes that early hydrauger prototypes are essential. Prototypes will demonstrate their effectiveness in extracting significant quantities of water, provide needed information on the composition of the land below the slide plane, prove their survivability and provide the necessary information to plan the implementation of the operational hydraugers in Phase 3. If these prototypes work well then that opens up opportunities to cut back on some of the preventative measures if they are no longer essential. Specifically, there could be re-evaluation of fracture infilling and upper-slope, interception hydraugers, both of which have significant environmental impacts and substantial costs that might be saved. If the prototype lower hydraugers don’t work, then the whole program will need to be reconsidered because we already know that all the other preventative measures combined will not achieve the defined success criteria.

3. Back Up Plan for Culvert under PVDS.

Include within the scope of the project for EIR purposes the installation of a possible new, second culvert beneath Palos Verdes Drive South in the vicinity of Peppertree Trail on the eastern side of the landslide.

Reason: Due to the unresolved questions about the viability of the sole, existing culvert under Palos Verdes Drive South and the viability of the storm-water pathway to that culvert, it would be prudent to include a functional alternative in the project as a backup for EIR purposes. The project as currently proposed relies exclusively upon a single, existing culvert to convey surface storm water from the canyons beneath Palos Verdes Drive South to the sea. That existing culvert is situated on the westerly side of the landslide at the elevation of the historic water channel of lower Portuguese Canyon. The culvert passes beneath the roadbed at a depth about 30 feet below the elevated Palos Verdes Drive road surface. There are well-known engineering questions:

(A) Whether the existing culvert under Palos Verdes Drive South is suitable for re-use. (See the attached **Elevation Mapping of the Proposed Landflow Retention Basin and PVDS Culvert Area** which shows that there may be little to no slope for an effective gravity-flow pathway to the existing culvert.),

(B) Whether the pathway for storm water flow from Peppertree Trail to that existing culvert will continue to sink in the future in the same manner that destroyed the 1990 storm drain system, and

(C) Whether that existing culvert and the pathway to it will survive for an economically reasonable useful life in the proposed new project. (See, for example, Hydrology and Hydraulics Evaluation, Geo-Logic Associates, December 9, 2019, Conclusions and Recommendations, second bullet point, p. 3 (Council page A-78 at A-79.) If either the existing culvert or the storm-water pathway to the existing culvert were to fail then the entire surface water control system north of the road will fail for lack of any outlet past the roadbed to the sea.

If the existing culvert and storm water pathway prove to be unsuitable and if no alternative plan has been evaluated in the current EIR then it might be necessary to incur the delay and expense for a new EIR on a new second culvert.

The existing culvert was the target of the 1990 storm drain system. It has been physically stranded because the landslide surface sank along on the pathway of storm water leading from Peppertree Trail to that culvert. The sinking of the land reversed the water flow along the storm water pathway to the existing culvert, thereby stranding that culvert. This failure has created an impounded pool of storm water from Paintbrush and Ishibashi Canyons that seeps into the ground and presumably percolates beneath the roadbed of Palos Verdes Drive South to the ocean.

The current project design includes a retention basin to be situated along the storm water pathway to the existing culvert. The retention basin is proposed to manage high volume flows, such as a 50-year or 100-year storm. The proposed retention basin will be subject to the same land-sinking risk along the storm-water pathway that destroyed the 1990 storm drain system.

The current EIR could be done with a conceptual design for a second culvert but without a fully detailed engineering design. The concept is to install the new culvert with its inlet (on the north side of the road) at least ten feet lower than the current lowest ground surface north of the road. This would create a vertical margin of ten feet to accommodate future sinking of the land without stranding the new culvert. If the existing culvert and pathway prove to be unsuitable, and an alternative culvert has been included in the first EIR, then it would be easier, cheaper and quicker to perform a supplemental environmental analysis (or possibly a mitigated negative declaration) for a fully engineered design for a new second culvert.

4. Infilling.

Expand scope to include possible use of filler materials other than fly ash, such as screened local soil, or imported soil or limestone. Reference Chambers, 2020-11, Section 1.4.1, Construction Phase I, Surface Fracture Infilling and Section 4.9.

Reason: A material data safety sheet for fly ash indicates that it is highly alkaline (high pH). The potential impact of such ash filler upon fertility of local soils should be evaluated.

5. Swale/Trail Integration. Much of the proposed swale structure parallels Peppertree Trail. We have suggested as part of a more holistic approach that there is an opportunity to integrate the swales with the trail.

Reason: Combining the lower swale with the existing trail would lead to a significantly reduced additional surface area required for the swale ("take" in NCCP parlance) and be a significant environmental and aesthetic benefit.

Attachment:

**Infrastructure Management Advisory Committee Stormwater Subcommittee Report
Elevation Mapping of the Proposed Landflow Retention Basin and PVDS Culvert Area
12/14/2020**

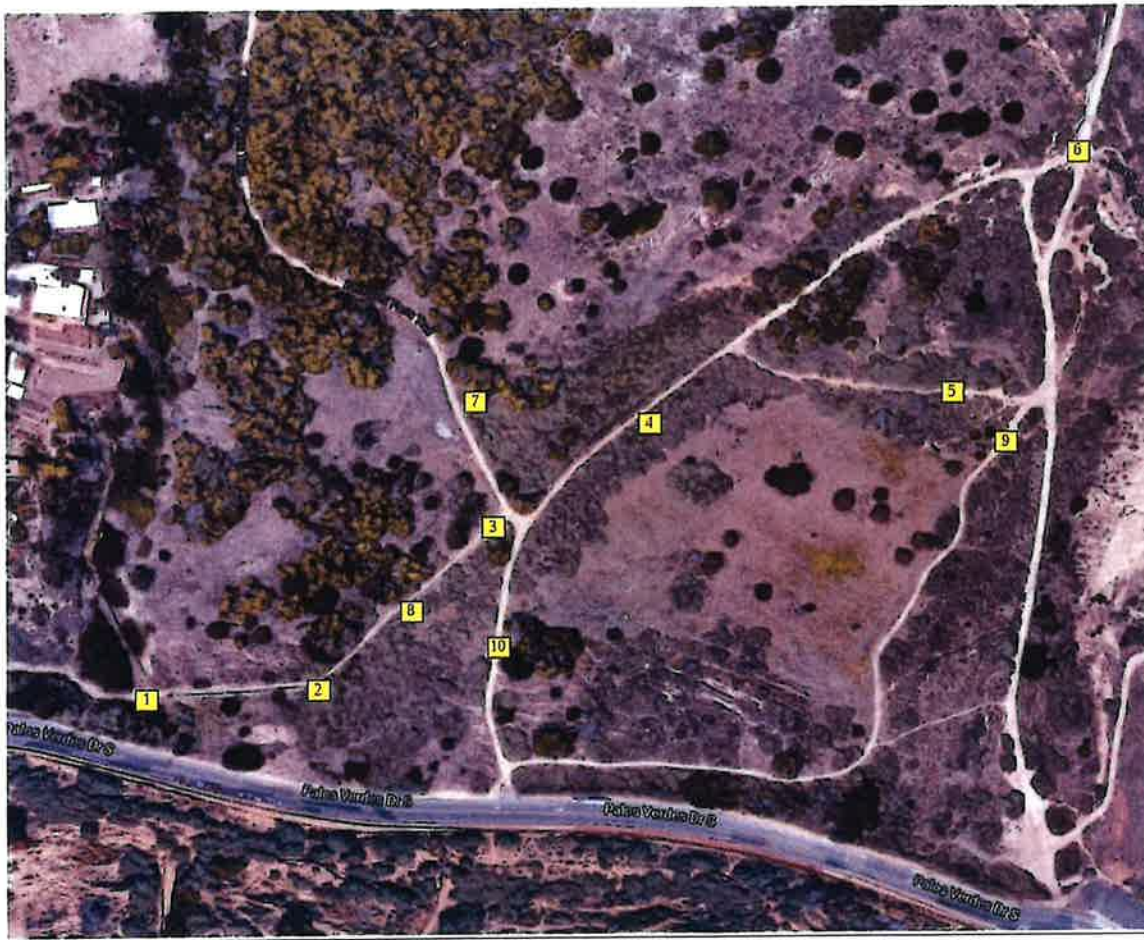
Summary:

The Portuguese Bend Landslide mitigation proposal includes a surface-water retention basin located north of Palos Verdes Drive South (PVDS) that outlets into the culvert under PVDS near Peppertree Lane. PVDS effectively forms a dam blocking storm water runoff from the landflow area to the ocean and the area of the proposed retention basin has been and likely still is sinking. Therefore, IMAC has raised concerns that the current concept of gravity flow of storm water from the proposed retention basin through the PVDS culvert may not be viable. To better understand the situation, the IMAC Stormwater Sub-committee conducted this study to roughly determine the elevation profile of the existing drain pipe running from the intersection of the Peppertree/Sandbox trails, past the proposed location of the surface-water retention basin to the culvert under PVDS and the surrounding area. This report documents the results of the study.

The measurements indicate that the local low spot where storm water runoff naturally accumulates, on the connector trail between the Ishibashi Farm Trail and the Peppertree Trail near PVDS, is roughly the same elevation as the inlet to the culvert under PVDS. Additionally, there is a ridge with almost a 30 foot rise in terrain height between the culvert and the identified low point on the pathway to the culvert. While this study was conducted using a smartphone for elevation measurements and should not be considered accurate enough on its own to support engineering decisions, it does provide sufficient evidence that a full elevation survey of the area is needed prior to finalizing the design of this aspect of the landflow mitigation effort.

Elevation Measurements:

This aerial view of the area shows the locations of elevation measurements taken with a smartphone GPS on the morning of 10/22/20. Points #1, #2, #8, #3, #4 and #6 are at locations on the existing, but no longer functioning, drain pipe that once carried storm water from the landflow area to the PVDS culvert. Point #1 is the PVDS culvert inlet, #8 is a local high point and #4 is a local low point (where the area is covered in silt and the pipe is not visible – presumably buried).



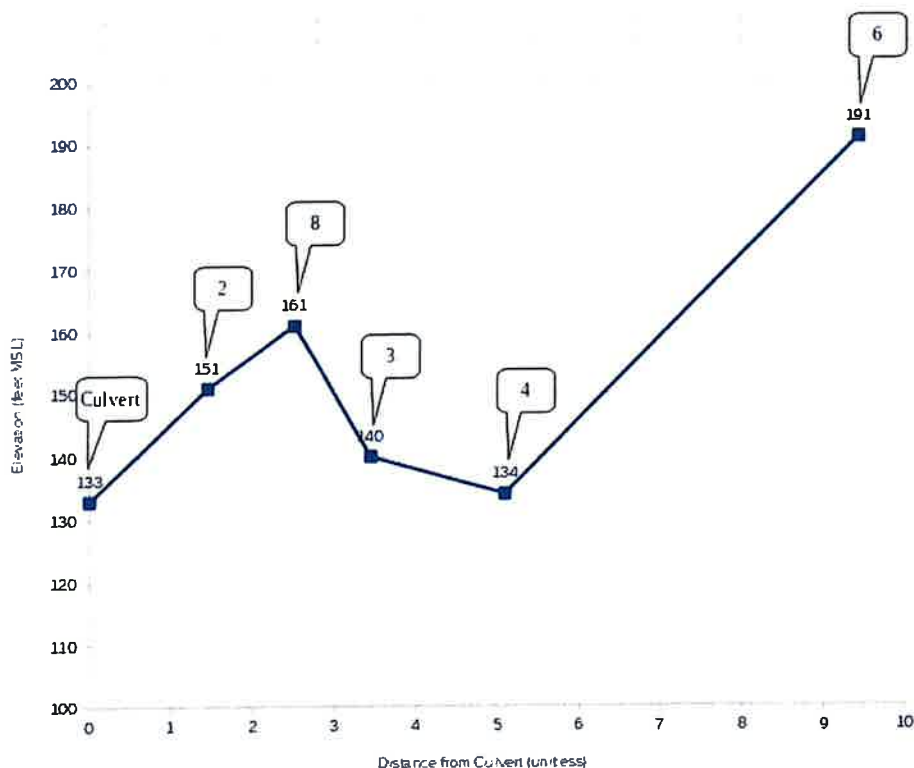
Point	GPS (MSL)	Delta H	Estimate	Elev (MSL)	Description
1	147	-8	-6	133	On trail at culvert. Estimate bottom of culvert is 6' below trail.
2	159	-8		151	On trail to culvert, local high point. Pipe bottom is level with trail.
3	150	-8	-2	140	Culvert trail 30' from Ishibashi Trail intersection, local low point. BOP is 2' below trail.
4	142	-8		134	Ishibashi to Peppertree connector, local low spot in silt. Can't see pipe here.
5	162	-8		154	Low flat area on trail near bottom. Did not walk this whole trail.
6	199	-8		191	Drain pipe 90° bend. Pipe is same level as trail.
7	181	-8	-20	153	Lowell's low spot on Ishibashi Trail
8	169	-8		161	Local high point on culvert trail
9	177	-8		169	local low point on trail heading toward PVDS
10	190	-8		182	Black "X" on trail in from PVDS

Delta H = Distance from Phone antenna to ground when reading

Estimate = My estimate of the height difference between ground and point of interest (usually the pipe bottom).

Elevation Measurements Along the Existing Drain Pipe:

The profile below shows the elevation change between the 90° bend in the drain pipe at the Peppertree Trail (Point #6) and the PVDS culvert (Point #1). It indicates that the contiguous fall line between point #6 and the culvert is a myth and a retention basin located around points #4 and #5 would probably not drain through to the culvert using gravity feed alone, especially if there is more sinking in the area.



Other Points of Interest:

Point #7 is the location of an estimated overall low point in the area. The trail in that area is at 173 ft MSL. Given all the brush etc., it's very hard to estimate the elevation distance from the trail to the ground below. We estimated about 20 ft which would make this spot above the silty area on the trail (Point #4) – 153 ft vs. 134 ft.

Points #5 and #9 could be used to support the idea of a culvert under PVDS on the south/east side of the landslide area. However, there is a substantial rise between this area and PVDS which would require a long tunnel or trench to get water under the road from this point.

Elevation Measurement Errors:

Two sources contributed to errors in the measurement of elevations presented in this report:

1. GPS Error:

This study was conducted using a smartphone and an App (ForeFlight) showing GPS altitude in feet above Mean Sea Level. The Smartphone GPS receiver is generally accurate to about 5 meters which does not provide the accuracy necessary to support the elevation profiles given in this report. However, the study was conducted under conditions and in a way that reduces many of the large errors inherent to GPS measurements. GPS receiver errors contributing to the 5 meter accuracy claim are dominated by:

Cause of Errors	Study Specific Consideration
Objects in the field of view of the GPS satellites.	The entire study location is open space and there are no trees, buildings etc. that would obstruct the view of the GPS satellites.
Changes in GPS satellites in view of the receiver (active) and their relative position to the receiver.	This is minimized because the readings were all taken in nearly the same geographic location and within an hour of each other.
Differences in modeling (earth ellipsoid, absolute MSL height etc.).	The study measurements compare locations relative to each other to create a profile. The results are relative and not dependent on absolute altitude that these modeling inaccuracies affect.

To further improve confidence, the GPS elevation of some of the data points was taken twice during the measurement period to confirm that the readings weren't "jumping around". In all cases, measurements taken at the same point minutes apart yielded results within a few feet of each other increasing the confidence of the accuracy of the technique.

	Measurement 1	Measurement 2
Point 1:	147' MSL	151' MSL
Point 2:	159' MSL	
Point 3:	150' MSL	155' MSL
Point 4:	142' MSL	140' MSL
Point 5:	162' MSL	
Point 6:	199' MSL	198' MSL
Point 7:	181' MSL	
Point 8:	169' MSL	

Point 9:	177' MSL	
Point 10:	190' MSL	184' MSL

Measurement 1: Obtained elevation measurement of each point in the point number order.

Measurement 2, About 20 minutes later, after completing all other points, returned to selected points and measured elevation again.

Only Measurement 1 points were reported because they were taken within the shortest time span.

2. Vertical Distance Estimate Error ("Estimate" in the data table):

Most measurements were taken while standing safely on a trail near the point of interest (such as the bottom of the drain pipe surveyed or a culvert inlet). In many instances, it was necessary to estimate the vertical distance from the trail surface to the point of interest. While care was taken to do this as accurately as possible, the use of proper surveying equipment would enhance the accuracy of the measurements a few more feet.

December 19, 2020 Rancho Palos Verdes City Council Public Hearing

Following is a summary of the oral speaker comments from the City Council meeting to receive public comments on environmental issues to be addressed in the Environmental Impact Report for the Portuguese Bend Landslide Mitigation Project

#	Name	Comments
1	Lowell Wedemeyer	Presented opinion on how the area reacts to rainfall events, earthquake, continuing landsliding events, and changing topography. This information is contained in the previously submitted Infrastructure Management Advisory Committee's Landflow Report – see Summary of IMAC Recommendations.
2	Barbara Sattler	Impressed with IMAC report, start with hydraugers. Want cracks to be filled with natural soil not cement slurry. Also would like the sewer line along Palos Verdes Drive South to be relocated.
3	Sunshine	1 Is the boundary of the project is being expanded to accommodate other City Issues including parking? 2 Preserve usage parking analysis should be included in this EIR. Phase I & II of the proposed design are appropriate to proceed with.
4	Peter Shaw	<p>Discussed hydraugers and need to install hydraugers as a first effort in minimizing the landslide movement. Success of the program depends on the lower elevation hydraugers ability to find high pressure water. Believes the hydraugers are a reasonable, favorable risk. We don't know how much the hydraugers will produce, so drilling is risky. Recommends testing the hydraugers early to determine success as a first phase. Suggested if hydraugers work sufficiently, infilling fishers would not be necessary as perhaps installing the surface water collection system which might not be needed. This could save time and money. Believes everything to gain and nothing to lose by moving the hydraugers to the first phase.</p> <p>Surface water collection system. Storm water flow ends up in the flow reduction area which is sinking. Existing survey by IMAC members shows the flow does not work as designed. Recommends a second pipe be considered under Palos Verdes Drive South to accommodate future movement. A larger pipe could be installed to eliminate the flow reduction area. Recommends quantifying the sinkage rate of the landslide area where the flow reduction area is proposed. Recommends immediate increase of ground surveys in the area. Recommends better integration of trails and storm water collection swales to</p>

		create a wholistic approach to the design to mitigate the Portuguese Bend Landslide Mitigation Measures.
5	W C Somer	No comment
6	Chad Dime	No comment
7	Noel Park	Agrees with IMAC. He has attended public meetings and sent in recommendations to be included in the public record. Asked replacement in kind for whatever habitat is removed, 3 to 1 ratio is preferred, but 2 to 1 replacement is not recommended. This is not the same thing as 3 to 1 and he wants the 3 to 1 replacement ratio to be required. What happens to water down stream from Palos Verdes Drive South pipe crossing? Wants water cleaned up so clear water is delivered to the ocean.
8	Sharon Yarber	Important to replace mature plants with mature plants. Wants hydraugers installed first. Does not want any improvements to impede trails. The security and safety of the sewer lines need to be addressed.
9	Councilman Dave Bradley	Asked to have the potable water included in the feasibility study for the connection of a Rolling Hills sewer system to the county collection system.
10	Councilman John Cruikshank	Closing fishers how is that a significant impact or air or water impacts Kelene: these are preliminary assessments and will be assed in the EIR, upon analysis many will be reduced to less than significant, but they need to be included now Have flexibility to include an additional culvert in the EIR -
11	Mayor Eric Alegria	Biological, hydrological etc, when will these be performed Ramzi/Kelene: when the EIR is performed. Would like moving the Phase III work to Phase I work.
12	Ara Mihranian	Adding a additional culvert under Palos Verdes Drive South could be an alternative so it could be included in the EIR.
13	Kelene Strain	Alternatives include things like adding a pipe are acceptable.
14	Councilman Ken Dyda	IMAC suggests looking at phasing – have EIR look at if changing the phasing is appropriate. Culvert under Palos Verdes Drive South - look at an alternative to what is proposed through the initial design work. How do we control the water to minimize erosion in a pipe? Consultant stated these were possible locations for the hydraugers.

		We know where the water is in the swales, so capturing that water and managing it is preferred.
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