

# 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.



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### 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.



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Sincerely,



David Berman  
President, South Coast Chapter  
California Native Plant Society



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