

# EXHIBIT C

## Mitigated Negative Declaration ENV-2019-5520-MND

[Published August 19, 2021](#)

### Link to MND and Appendices

[Mitigated Negative Declaration](#)

[Appendix A – Air Quality and Noise Impact Assessment](#)

[Appendix B – Biological Resource Letter Report](#)

[Appendix C – Arborist Report](#)

[Appendix D – Preliminary Landscape Plan](#)

[Appendix E – Cultural Resources Report](#)

[Appendix F – LADBS Grading Division Approval Letter](#)

[Appendix G – Hydrology and Hydraulics Report](#)

[Appendix H – Traffic Management Plan](#)

[Appendix I – VMT Outputs](#)

[Appendix J – Mitigation Monitoring Plan \(MMP\)](#)

### Comments and Response to Comments

**C-1** California Department of Fish and Wildlife (CDFW)

**C-2** California Coastal Commission (CCC)

### Errata

**C-3** Erratum No. 1 dated September 23, 2022

**Erratum No. 2 dated November 3, 2023**

## **Comments and Response to Comments**

### **C-1** California Department of Fish and Wildlife (CDFW)



State of California – Natural Resources Agency  
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GAVIN NEWSOM, Governor  
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May 25, 2021

Makan Baranghoori  
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Department of City Planning  
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[Makan.Baranghoori@lacity.org](mailto:Makan.Baranghoori@lacity.org)

**Subject: Comments on Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, Los Angeles County**

Dear Makan Baranghoori:

The California Department of Fish and Wildlife (CDFW) has reviewed the Revello Drive and Tramonto Drive Residential Project (Project) proposed by the City of Los Angeles (City; Lead Agency). Supporting documentation for the Project includes an Initial Study / Mitigated Negative Declaration (IS/MND) and *Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California* (Dudek 2021). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish

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Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 2 of 6

& G. Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

## Project Description and Summary

**Objective:** The Project proposes the construction of four single-family residences on 12 vacant parcels of land in the Pacific Palisades neighborhood of Los Angeles. During construction, there will be two primary staging and parking areas. The first staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The second staging/parking area will be a relatively flat pad that is approximately 36 feet wide and 180 feet long. Project-related activities include grading, terracing, vegetation clearing, and house construction. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

**Location:** The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County. The Project is south of Tramonto Drive, west of Sunset Boulevard, and north of the Pacific Coast Highway (PCH) at approximately 0.2-mile northwest of the intersection of Sunset Boulevard and PCH. The Los Angeles County Assessor's Parcel Numbers (APN) associated with the Project are: 4416-011-003, 4416-011-004, 4416-011-006, 4416-021-003, 4416-021-004, 4416-021-005, 4416-021-006, 4416-021-007, 4416-021-008, 4416-021-015, 4416-021-016, and 4416-021-060.

## Comments and Recommendations

The City submitted Project-related documents for an informal consultation with CDFW on April 20, 2021 [CEQA Guidelines, § 15063(g)]. Biological surveys of the Project site were performed on November 12, 2019, June 16, 2020, and February 1, 2021 (Biological Resources Letter Report). The Biological Resources Letter Report (BRLR) was intended to "1) describe the existing conditions of biological resources within the project site in terms of vegetation, flora, wildlife, and wildlife habitats; 2) quantify impacts to biological resources that would result from implementation of the proposed project and describe those impacts in terms of biological significance in view of federal, state, and local laws and policies; and 3) recommend mitigation measures for impacts to sensitive biological resources."

After reviewing the IS/MND and BRLR, CDFW offers the comments and recommendations below to assist the City in adequately identifying the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the City consider our comments and recommendations when preparing an environmental document that may provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151].

## Specific Comments

1. Impacts to Sensitive Vegetation. According to *Table 3 – Impacts to Vegetation Communities and Land Cover Types in the Study Area* of the BRLR, the proposed Project will impact 0.56 acres of lemonade berry scrub (*Rhus integrifolia*). Lemonade berry scrub is considered by CDFW as a [Sensitive Natural Community](#) (CDFW 2021a) and is listed by California Native Plant Society (CNPS) as having a rarity ranking of S3 (CNPS 2021).



Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 3 of 6

CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California. Impacts to sensitive vegetation communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative 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 CDFW or U.S. Fish and Wildlife Service (USFWS).

Mitigation Measure MM-BIO-1 of the Initial Study/Mitigated Negative Declaration (IS/MND) offers three options for mitigation for impacts to special-status vegetation communities (i.e., lemonade berry scrub). They can be summed up as:

Option 1: Mitigation Bank Funding – Project proponent will purchase credits at a mitigation bank within City limits at a ratio of 1:1 for impacts to 0.56 acres of lemonade berry scrub. If purchasing credits at a mitigation bank outside of City limits, then credits will be sought at 2:1 (1.12 acres).

Option 2: Off-site Land Acquisition, Preservation, and In-Kind Habitat Creation/Restoration – Project proponent will purchase lands having either at least 0.56 acres (1:1 for acres impacted) of lemonade berry scrub or have the potential to support the creation of 0.56 acres of lemonade berry scrub on-site.

Option 3: Off-site Land Acquisition, Preservation, and Out-of-Kind Habitat Restoration – If acquisition of property within City limits with existing lemonade berry scrub or the potential to support creation of lemonade berry scrub is not feasible, Project proponent will purchase property at a ratio of 2:1 (1.12 acres) for another vegetation community within the California maritime chaparral group.

**Recommendation:** Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency (CEQA Guidelines, § 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). Therefore, CDFW recommends the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). CDFW recommends updating the MND to provide adequate and complete disclosure of information that would tie mitigation measures to the resources being impacted via the following:

- 1) What specific biological resources would the mitigation measures be protecting or conserving;
- 2) What performance measures the proposed mitigation would achieve (CEQA Guidelines, § 15126.4);
- 3) What type(s) of potential action(s) that can feasibly achieve those performance standards (CEQA Guidelines, § 15126.4);
- 4) How suggested mitigation measures are designed to reduce impacts to below a level of

Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 4 of 6

significance;

- 5) Where mitigation is intended to occur. If off-site, where land would be acquired or where the mitigation bank is located; and
- 6) When the mitigation efforts would begin and be completed in relation to timeline of the Project.

**Recommendation:** All mitigation measures should be clearly identified, defined, and executed prior to the initiation of Project-related activities.

**Recommendation:** CDFW recommends avoiding impacts to sensitive natural communities. If avoidance is not feasible, then on-site restoration or creation should be at least 2:1 (1.12 acres created for 0.56 acres impacted) to account for loss of impacted vegetation and temporal loss (at least 36 months). Should on-site restoration not be feasible, then purchase of mitigation credits or off-site land acquisition should be at least 3:1 to account for the loss of sensitive natural communities in proximity to the Project site.

**Recommendation:** Should the purchase of mitigation credits be used as mitigation for the Project, CDFW recommends purchasing restoration or creation credits and not enhancement or preservation. The City should further clarify the mitigation option to be chosen and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City's issuance of grading permits.

2. Non-Native Plants and Landscaping. The proposed Project will involve significant landscaping throughout the Project site for aesthetic purposes. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site, similar to species found in adjacent natural habitats.

**Recommendation:** If the Project may involve landscaping, CDFW recommends the IS/MND provide the landscaping plant palette and restrict use of species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2021). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

**Recommendation:** If non-native invasive plants are on site, CDFW recommends the IS/MND provide measures to reduce the spread of non-natives during Project construction and activities. Spreading non-native plants during Project activities may have the potential to impact areas not currently exposed to non-native plants. This could result in expediting the loss of natural habitats in and adjacent to the Project site and should be prevented.

## General Comments

1. Data. CDFW recommends the City report any special status plants and wildlife species, and sensitive plant communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2021b).

Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 5 of 6

2. **Mitigation Measures.** Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Mitigation measures must be feasible, effective, implemented, and fully enforceable by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). In preparation of an environmental document, CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6).

## Conclusion

CDFW appreciates the opportunity to provide early comments and recommendations regarding the Project to assist the City of Los Angeles in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW looks forward to reviewing an ensuing Project-related environmental document. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at [Andrew.Valand@wildlife.ca.gov](mailto:Andrew.Valand@wildlife.ca.gov) or (562) 292-6821.

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

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Erinn Wilson-Olgin  
Environmental Program Manager I  
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cc: CDFW

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## References

- [Cal-IPC] California Invasive Plant Council. 2021. The Cal-IPC Inventory. Available from: <https://www.cal-ipc.org/plants/inventory/>
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- [CDFW 2021b] California Department of Fish and Wildlife. 2020. Submitting Data to the CNDDDB. Available from: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Makan Bharanghoori  
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May 25, 2021  
Page 6 of 6

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September 16, 2021

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**Subject: Revello Drive and Tramonto Drive Residential Project, Mitigated Negative Declaration, SCH #2021080308, Los Angeles County**

Dear Mr. Baranghoori:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study Mitigated Negative Declaration (MND) for the Revello Drive and Tramonto Drive Residential Project (Project) proposed by the City of Los Angeles (City/Lead Agency). The MND's supporting documentation includes Appendix B Biological Resource Letter Report (BRR). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

Makan Barangoori  
City of Los Angeles  
September 16, 2021  
Page 2 of 14

## Project Description and Summary

**Objective:** The Project consists of the construction of four single-family residences proposed by two different ownership groups [Springhouse Hamilton Park, LLC (SHP) and JDR Revello, LLC (JDR)]. There will be two primary staging and parking areas during construction. The staging/parking area for SHP House 1 will be on site behind the building footprint. This staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The staging/parking area for the three homes on Revello (i.e., SHP House 2 and JDR Houses 1 and 2) will be located west of the current terminus of Revello Drive between JDR House 2 and SHP House 2. This staging/parking area will be a relatively flat pad that is approximately 36 feet wide by 180 feet long. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

**Location:** The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, California. The Project-site totals approximately 1.33 acres and is surrounded by single-family residences with small-sized lots primarily dominated by planted landscaping. The Project is south of Tramonto Drive, west of Sunset Boulevard, and north of the Pacific Coast Highway (PCH), and approximately 0.2-mile northwest of the intersection of Sunset Boulevard and PCH. The Los Angeles County Assessor's Parcel Numbers (APN) associated with the Project are: 4416-011-003, 4416-011-004, 4416-011-006, 4416-021-003, 4416-021-004, 4416-021-005, 4416-021-006, 4416-021-007, 4416-021-008, 4416-021-015, 4416-021-016, and 4416-021-060.

## Comments and Recommendations

The City submitted Project-related documents for an informal consultation with CDFW on April 20, 2021 [CEQA Guidelines, § 15063(g)]. CDFW submitted consultation comments to the City on May 25, 2021. CDFW offers the comments and recommendations below to assist the City of Los Angeles in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

### Specific Comments

#### Comment #1: Potential Impacts to Monarch Butterflies

**Issue:** The Project may impact monarch butterfly (*Danaus plexippus* population 1 – California overwintering population) and monarch butterfly overwintering habitat.

**Specific impacts:** The Project could remove and impact potential overwintering habitat for monarch butterflies. Vegetation removal and tree trimming could have a negative effect on monarch butterflies by causing injury or mortality; reducing health and vigor; and reducing reproductive success. Permanent or temporary impacts on overwintering habitat could result in local population decline or local extirpation of monarch butterflies.



Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 3 of 14

**Why impact would occur:** In western North America, monarch overwintering sites are distributed along the California coast from Mendocino County to the Mexican border, and south into Baja California, Mexico (Xerces Society 2017). Monarch butterflies cluster in large groups in forested groves along the California coast. The Project site could provide an overwintering grove for monarch butterflies because of its location relative to the coast, proximity to known overwintering sites, and support of wintering trees. According to CNDDDB there are four records of monarch overwintering sites within 3 miles of the Project site, the closest one, approximately 0.3 miles west of the Project site.

The Project may require trees and other vegetation to be removed or trimmed in order to facilitate building construction. Removing trees during the overwintering period could have direct impacts on monarch butterflies, potentially resulting in injury or mortality; reduced health and vigor; and reduced success during spring and summer migration to breeding sites. Furthermore, removing trees could reduce or eliminate overwintering habitat, potentially leading to local population decline or local extirpation of monarch butterflies.

**Evidence impact would be significant:** The MND does not provide any information as to the Project's potential impacts on monarch butterflies and overwintering habitat. CDFW is unable to comment on whether the Project would impact monarch butterflies and overwintering habitat, where impacts would occur, and if impacts would be significant.

Monarch numbers have dropped by 99 percent from an estimated 4 million butterflies just twenty years ago (CDFW 2021a). Given the precipitous decline of monarch butterflies, the monarch butterfly is currently slated to be listed in 2024 under the Endangered Species Act (CDFW 2021a). The monarch butterfly is included on CDFW's [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) list and identified as a Species of Greatest Conservation Need in California's [State Wildlife Action Plan](#) (CDFW 2017; CDFW 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 4 of 14

### Recommended Potentially Feasible Mitigation Measure(s):

**Mitigation Measure #1:** If the Project-site supports an overwintering grove/population of monarchs, CDFW recommends the City require the Project proponent to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City should require the Project proponent to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City. The Monarch Butterfly Overwintering Habitat Management Plan should provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions should include:

- *Protect:* Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.
- *Manage:* Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present in the southern California coast.
- *Enhance:* Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.
- *Restore:* Any trees removed as part of the Project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), Coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menziesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.
- *Pesticides:* Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.
- *Tropical milkweed and pathogens:* Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed and replaced with native, insecticide-free nectar plants suitable for the location.

**Mitigation Measure #2:** If the Project-site does not support overwintering habitat, CDFW recommends the City require the Project proponent to avoid and minimize impacts on monarch



Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 5 of 14

butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.

**Recommendation #1:** CDFW recommends the following resources for information on managing monarch overwintering habitat:

- [Western Monarch Butterfly Conservation Plan](#) (WAFWA 2019);
- [Overwintering Site Management and Protection](#) (Western Monarch Count 2021);
- [Protecting California's Butterfly Groves](#) (Xerces Society 2017);
- [Managing Monarch Habitat in the West](#) (Xerces Society 2021);
- [Monarch Butterfly Nectar Plant Lists for Conservation Plantings](#) (Xerces Society 2018);
- [Tropical Milkweed](#) (Wheeler 2018); and,
- CDFW's [Monarch Butterfly](#) webpage page (CDFW 2021a).

**Recommendation #2:** CDFW recommends the City require the Project proponent to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project's environmental document.

**Recommendation #3:** CDFW recommends the City recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.

### **Additional Recommendations**

Impacts to Bats. The Project includes activities that will result in the removal of trees and vegetation that may provide habitat for western mastiff bat (*Eumops perotis* ssp. *californicus*), a California Species of Special Concern (SSC), as identified in the BRR. The BRR states, "This species is not likely to roost on site due to the lack of suitable roosting trees or rocky habitat. Therefore, impacts to special-status wildlife would be considered less than significant."

Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential foraging habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of foraging habitat for bats.

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 6 of 14

Impacts to Sensitive Vegetation. MM-BIO-1 in the Initial Study states, “the project applicant shall purchase restoration or creation credits of at least 2:1 (1.12 acres for 0.56 acres impacted) to mitigate the project’s impact on the sensitive-status Lemonade Berry Scrub vegetation community to a less-than-significant level.” However, section 5.1 *Minimization and Mitigation Measures for Special-Status Vegetation Communities* of the BRR states, “The project applicant, or its designee, shall provide mitigation bank funding at 3:1 (1.68 acres) to replace special-status vegetation communities (i.e., lemonade berry scrub) removed due to project construction and fuel modification activities.” CDFW supports the minimization and mitigation measure presented in the BRR to mitigate for impacts to sensitive vegetation communities.

CDFW recommends adhering to the mitigation presented in BRR where lemonade berry is replaced at a ratio of 3:1 (1.68 acres) for the off-site mitigation bank restoration/creation credits. The City should further clarify the mitigation and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City’s issuance of grading permits.

Nesting Birds. CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted as stated in the Initial Study, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.

It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Rodenticides. CDFW recommends project proponent prevent the use of second-generation anticoagulant rodenticides on any project associated with the Project.

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the subsequent CEQA document include measures where lead agencies of individual projects tiering from the subsequent CEQA document report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDDB by completing the [Online Field Survey Form](#) (CDFW 2021b). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document. The lead agency should provide CDFW with confirmation of data submittal.

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 7 of 14

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist project proponents in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

### Filing Fees

The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

### Conclusion

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov) or (562) 292-8105.

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

B6E58CFE24724F5...

Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

cc: CDFW

Erinn Wilson-Olgin, San Diego – [Erinn.Wilson-Olgin@wildlife.ca.gov](mailto:Erinn.Wilson-Olgin@wildlife.ca.gov)  
Victoria Tang, Los Alamitos – [Victoria.Tang@wildlife.ca.gov](mailto:Victoria.Tang@wildlife.ca.gov)  
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CEQA Program Coordinator, Sacramento – [CEQACommentLetters@wildlife.ca.gov](mailto:CEQACommentLetters@wildlife.ca.gov)

State Clearinghouse, Office of Planning and Research – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 8 of 14

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State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
<b>MM-BIO-1-Monarch Overwintering Habitat</b>	<p>If the Project site supports an overwintering grove/population of monarchs, the City shall require the Project proponent to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City shall require the Project proponent to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan shall be submitted to the City before the City adopts the Century Villages at Cabrillo Specific Plan and a Long Beach Zoning Ordinance and Zoning Map Amendment. The Monarch Butterfly Overwintering Habitat Management Plan shall provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions shall include:</p> <ul style="list-style-type: none"><li>• <i>Protect:</i> Trees shall not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal shall be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs shall not be removed in overwintering groves. Shrubs shall be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.</li><li>• <i>Manage:</i> Management activities, such as tree trimming and mowing, shall be conducted in groves from March 15 through September 15 outside of the estimated</li></ul>	Prior to Construction	City of Los Angeles

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 10 of 14

	<p>timeframe when monarchs are likely present in the southern California coast.</p> <ul style="list-style-type: none"><li>• <i>Enhance</i>: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.</li><li>• <i>Restore</i>: Any trees removed as part of the Project shall be replaced with trees at no less than 2:1. Native insecticide-free trees shall be planted such as Monterey pine (<i>Pinus radiata</i>), Monterey cypress (<i>Cupressus macrocarpa</i>), Coast redwood (<i>Sequoia sempervirens</i>), coast live oak (<i>Quercus agrifolia</i>), Douglas fir (<i>Pseudotsuga menziesii</i>), Torrey pine (<i>Pinus torreyana</i>), western sycamore (<i>Platanus racemosa</i>), bishop pine (<i>Pinus radiata</i>) and others, as appropriate for location.</li><li>• <i>Pesticides</i>: Use of pesticides shall be avoided, particularly when monarchs may be present. If pesticides are used, applications shall be conducted from March 15 through September 15, when possible. Herbicide shall not be applied on blooming flowers. Herbicide shall be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods shall be used, large-scale broadcast applications shall be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, shall not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants shall not be used. Non-chemical weed control techniques shall be used when possible.</li><li>• <i>Tropical milkweed and pathogens</i>: Non-native tropical</li></ul>		
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Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 11 of 14

	milkweed shall not be planted in order to minimize the spread of the pathogen <i>Ophryocystis elektroscirrha</i> (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed shall be removed and replaced with native, insecticide-free nectar plants suitable for the location.		
<b>MM-BIO-2- Monarch Overwintering Habitat</b>	If the Project site does not support overwintering habitat, the City shall require the Project proponent to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.	Prior to Construction	City of Los Angeles Project Proponent
<b>REC-1- Monarch Overwintering Habitat</b>	CDFW recommends the following resources for information on managing monarch overwintering habitat: <ul style="list-style-type: none"> <li>• <a href="#">Western Monarch Butterfly Conservation Plan</a> (WAFWA 2019);</li> <li>• <a href="#">Overwintering Site Management and Protection</a> (Western Monarch Count 2021);</li> <li>• <a href="#">Protecting California's Butterfly Groves</a> (Xerces Society 2017);</li> <li>• <a href="#">Managing Monarch Habitat in the West</a> (Xerces Society 2021);</li> <li>• <a href="#">Monarch Butterfly Nectar Plant Lists for Conservation Plantings</a> (Xerces Society 2018);</li> <li>• <a href="#">Tropical Milkweed</a> (Wheeler 2018); and,</li> <li>• CDFW's <a href="#">Monarch Butterfly</a> webpage page (CDFW 2021a).</li> </ul>	Prior to Construction	City of Los Angeles
<b>REC-2- Monarch Overwintering Habitat</b>	CDFW recommends the City require the Project proponent to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for	Prior to Construction	City of Los Angeles Project Proponent



Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 12 of 14

	the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project's environmental document.		
<b>REC-3- Monarch Overwintering Habitat</b>	CDFW recommends the City recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.	Prior to Construction	City of Los Angeles
<b>REC-4-Impacts to Bat Species</b>	Prior to construction activities, a qualified bat specialist shall conduct bat surveys within the Project area (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and	Prior to Construction	Project Proponent



Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 13 of 14

	submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of foraging habitat for bats.		
<b>REC-5-Impacts to Sensitive Vegetation</b>	CDFW recommends adhering to the mitigation presented in BRR where lemonade berry is replaced at a ratio of 3:1 (1.68 acres) for the off-site mitigation bank restoration/creation credits.	Prior to Construction	Project Proponent
<b>REC-6- Impacts to Sensitive Vegetation</b>	The City should further clarify the mitigation and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City's issuance of grading permits.	Prior to Construction	Project Proponent
<b>REC-7-Nesting Birds</b>	CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey shall be conducted as stated in MM BIO-2, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.	Prior to Construction	Project Proponent
<b>REC-8-Rodenticides</b>	CDFW recommends the City exclude the use of second-generation anticoagulant rodenticides for all subsequent individual projects.	During the life of the Project	Project Proponent
<b>REC-9-Data</b>	Project-level lead agencies shall ensure sensitive and special status species data has been properly submitted to the <a href="#">California Natural Diversity Database</a> with all data fields applicable filled out. Confirmation of data submittal shall be provided to CDFW.	Prior to Construction	Project Proponent
<b>REC-10- Mitigation and Monitoring Reporting Plan</b>	The City should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures	Prior to finalizing MND	Project Proponent

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Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 14 of 14

	recommended in this letter. the City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.		
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October 14, 2021

12347.01

Greg Demos  
Springhouse Hamilton Park, LLC  
JDR Revello LLC  
4675 MacArthur Court, Suite 550  
Newport Beach, California 92660

**Subject: Revello Drive and Tramonto Drive Residential Project – Response to California Department of Fish and Wildlife Comment Letter (dated September 16, 2021)**

Dear Mr. Demos:

This letter is response to a comment letter that the City of Los Angeles (City) received from the California Department of Fish and Wildlife (CDFW), dated September 16, 2021 (Attachment A), in regards to the Mitigated Negative Declaration (MND) (SCH #2021080308) prepared for the Revello Drive and Tramonto Drive Residential Project (Project). The City had previously received a comment letter from CDFW, dated May 25, 2021 (Attachment B), regarding the MND. Those comments were taken into consideration throughout preparation of the MND during the California Environmental Quality Act (CEQA) process, and recommendations therein were incorporated into the Project, as appropriate. The following responses are related directly to the comments provided by CDFW in their September 16, 2021 letter. The responses are based upon a site visit by Dudek biologist Tracy Park on September 27, 2021 and a literature review.

## Response to Comments

### Comment #1: Potential Impacts to Monarch Butterflies

This comment is regarding the Project's potential to impact monarch butterfly (*Danaus plexippus* population 1 – California overwintering population) and monarch butterfly overwintering habitat. Western monarchs aggregate in clusters at forested groves and the tree species most used for roosting are the nonnative blue gum eucalyptus (*Eucalyptus globulus*) and the native Monterey pine (*Pinus radiata*) and Monterey cypress (*Cupressus macrocarpa*). Clusters can also be found on nonnative red gum eucalyptus (*Eucalyptus camaldulensis*), and the native western sycamore (*Platanus racemosa*), coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), and others<sup>1</sup>. All of the extant records in the California Natural Diversity Database (CNDDDB) of western monarch overwintering colonies on the southern slopes/Pacific Ocean interface included eucalyptus or sycamore groves<sup>2</sup>.

The Project does not support forested groves, and none are located adjacent to the Project site. Per the tree reports prepared for the Project, five (5) trees would be removed, three (3) *Myoporum* sp. and two (2) Italian stone pine

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<sup>1</sup> Western Monarch Milkweed Mapper. 2021. Western Monarch Biology. Accessed September 2021.  
<https://www.monarchmilkweedmapper.org/western-monarch-biology/>.

<sup>2</sup> California Department of Fish and Wildlife. 2021. California Natural Diversity Database, RareFind 5 online viewer. Accessed September 2021. <https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data>.

(*Pinus pinea*). The Project site does not have the habitat elements to support overwintering monarch butterfly and the nearest potential roosting site (5 *Eucalyptus* sp. adjacent to a house) is located more than 100 feet to the southwest of the Project. Additionally, no monarch butterfly individuals were observed during any of the site visits (November 12, 2019; June 16, 2020; February 1, 2021; and September 27, 2021). Thus, CDFW's recommended Mitigation Measure #1 and Recommendations #1 through #3 are not applicable to the Project and the MND sufficiently analyzes the potential impacts to special-status species, including western monarch, under CEQA.

## Comment #2: Impacts to Bats

This comment is regarding the Project's potential to impact habitat for western mastiff bat (*Eumops perotis californicus*), which is a California Species of Special Concern. The following is the description of roosting habitat taken from the Terrestrial Mammal Species of Special Concern in California<sup>3</sup>:

"*E. perotis* is primarily a crevice dwelling species. Natural roosts are often found under large exfoliating slabs of granite, sandstone slabs or in columnar basalt, on cliff faces or in large boulders (Dalquest 1946, Krutzsch 1955, Vaughan 1959). A number of roosts have also been located in appropriately proportioned cracks in buildings (Howell 1920a, Barbour and Davis 1969). Roosts are generally high above the ground, usually allowing a clear vertical drop of at least 10 ft (3 m) below the entrance for flight (Vaughan 1959, Barbour and Davis 1969). Roosts recently located in California were in exfoliating granite, sandstone, or columnar basalt (Pierson and Rainey 1996b). In all cases the bats are in a crevice at least 3.5 m above the ground."

Ms. Park did not identify any of the roosting habitat elements associated with western mastiff bat (i.e., large exfoliating slabs of granite, sandstone slabs or in columnar basalt, on cliff faces, in large boulders, and cracks in buildings). Therefore, the species is not expected to have diurnal, maternal, or wintering roosts on site. As stated in the Biological Resource Letter Report (BRLR) prepared by Dudek for the MND, the species may occasionally forage within the Project site, but the species is not likely to roost on site. As such, the MND sufficiently analyzes the potential impacts to special-status species, including western mastiff bat, under CEQA.

## Comment #3: Impacts to Sensitive Vegetation

This comment is regarding the Project's impact on the sensitive-status lemonade berry scrub vegetation community. CDFW recommends adhering to the mitigation presented in BRLR where lemonade berry scrub is replaced at a ratio of 3:1 for the off-site mitigation bank restoration/creation credits. However, it was determined that a ratio of 2:1 was sufficient to mitigate Project impacts to the vegetation community under CEQA due to the high quality of the habitat at the Soquel Canyon Mitigation Bank (a CDFW-approved bank), in contrast to the highly disturbed, isolated, and high non-native species composition of the lemonade berry scrub on the Project site.

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<sup>3</sup> Bolster, B.C., editor. 1998. Terrestrial Mammal Species of Special Concern in California. Draft Final Report prepared by P.V. Brylski, P.W. Collins, E.D. Pierson, W.E. Rainey and T.E. Kucera. Report submitted to California Department of Fish and Game Wildlife Management Division, Nongame Bird and Mammal Conservation Program for Contract No.FG3146WM.

#### **Comment #4: Nesting Birds**

This comment is regarding CDFW's recommendation to avoid impacts to nesting bird and impacts to nesting bird habitat. MM-BIO-1 provides compensatory mitigation for impacts to the native vegetation community located on the Project site and nesting birds surveys are recommended for the Project to be in compliance with the Migratory Bird Treaty Act and California Fish and Game Code. As such, impacts to nesting birds are sufficiently analyzed in the MND.

#### **Comment #5: Rodenticides**

This comment is regarding CDFW's recommendation that the Project applicant prevent the use of second-generation anticoagulant rodenticides on any project associated with the Project. The comment is noted but it is not an issue that is relevant to the Project's CEQA analysis.

#### **Comment #6: Data**

This comment is regarding CDFW's recommendation that any data for special-status species be submitted to the agency for inclusion into the California Natural Diversity Database. Since no special-status species were recorded on the Project site there is no data to submit.

#### **Comment #7: Mitigation and Monitoring Reporting Plan**

This comment is regarding CDFW's recommendation the City update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in their letter. As shown in the response for the previous comments, none of the proposed mitigation measures and recommendations are warranted. As such, the MND does not need to be updated and recirculated.

#### **Comment #8: Filing Fees**

This comment is regarding the payment of the fee that is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). The Project Applicant will pay the fee upon the filing of the Notice of Determination by the City.

Please let me know if you have any questions or comments regarding this letter.

Sincerely,



Michael Cady  
Senior Biologist

Att: A) California Department of Fish and Wildlife Comment Letter (dated September 16, 2021)  
B) California Department of Fish and Wildlife Comment Letter (dated May 25, 2021)  
cc: Tony Russo, Crest Real Estate  
Nicole Cobleigh, Dudek



# Attachment A

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California Department of Fish and Wildlife Comment Letter  
(dated September 16, 2021)



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



September 16, 2021

Makan Baranghoori  
City of Los Angeles  
200 North Spring Street, Room 721  
Los Angeles, CA, 90012  
[makan.baranghoori@lacity.org](mailto:makan.baranghoori@lacity.org)

**Subject: Revello Drive and Tramonto Drive Residential Project, Mitigated Negative Declaration, SCH #2021080308, Los Angeles County**

Dear Mr. Baranghoori:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study Mitigated Negative Declaration (MND) for the Revello Drive and Tramonto Drive Residential Project (Project) proposed by the City of Los Angeles (City/Lead Agency). The MND's supporting documentation includes Appendix B Biological Resource Letter Report (BRR). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.



Makan Barangoori  
City of Los Angeles  
September 16, 2021  
Page 2 of 14

## Project Description and Summary

**Objective:** The Project consists of the construction of four single-family residences proposed by two different ownership groups [Springhouse Hamilton Park, LLC (SHP) and JDR Revello, LLC (JDR)]. There will be two primary staging and parking areas during construction. The staging/parking area for SHP House 1 will be on site behind the building footprint. This staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The staging/parking area for the three homes on Revello (i.e., SHP House 2 and JDR Houses 1 and 2) will be located west of the current terminus of Revello Drive between JDR House 2 and SHP House 2. This staging/parking area will be a relatively flat pad that is approximately 36 feet wide by 180 feet long. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

**Location:** The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, California. The Project-site totals approximately 1.33 acres and is surrounded by single-family residences with small-sized lots primarily dominated by planted landscaping. The Project is south of Tramonto Drive, west of Sunset Boulevard, and north of the Pacific Coast Highway (PCH), and approximately 0.2-mile northwest of the intersection of Sunset Boulevard and PCH. The Los Angeles County Assessor's Parcel Numbers (APN) associated with the Project are: 4416-011-003, 4416-011-004, 4416-011-006, 4416-021-003, 4416-021-004, 4416-021-005, 4416-021-006, 4416-021-007, 4416-021-008, 4416-021-015, 4416-021-016, and 4416-021-060.

## Comments and Recommendations

The City submitted Project-related documents for an informal consultation with CDFW on April 20, 2021 [CEQA Guidelines, § 15063(g)]. CDFW submitted consultation comments to the City on May 25, 2021. CDFW offers the comments and recommendations below to assist the City of Los Angeles in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

### Specific Comments

#### Comment #1: Potential Impacts to Monarch Butterflies

**Issue:** The Project may impact monarch butterfly (*Danaus plexippus* population 1 – California overwintering population) and monarch butterfly overwintering habitat.

**Specific impacts:** The Project could remove and impact potential overwintering habitat for monarch butterflies. Vegetation removal and tree trimming could have a negative effect on monarch butterflies by causing injury or mortality; reducing health and vigor; and reducing reproductive success. Permanent or temporary impacts on overwintering habitat could result in local population decline or local extirpation of monarch butterflies.



Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 3 of 14

**Why impact would occur:** In western North America, monarch overwintering sites are distributed along the California coast from Mendocino County to the Mexican border, and south into Baja California, Mexico (Xerces Society 2017). Monarch butterflies cluster in large groups in forested groves along the California coast. The Project site could provide an overwintering grove for monarch butterflies because of its location relative to the coast, proximity to known overwintering sites, and support of wintering trees. According to CNDDDB there are four records of monarch overwintering sites within 3 miles of the Project site, the closest one, approximately 0.3 miles west of the Project site.

The Project may require trees and other vegetation to be removed or trimmed in order to facilitate building construction. Removing trees during the overwintering period could have direct impacts on monarch butterflies, potentially resulting in injury or mortality; reduced health and vigor; and reduced success during spring and summer migration to breeding sites. Furthermore, removing trees could reduce or eliminate overwintering habitat, potentially leading to local population decline or local extirpation of monarch butterflies.

**Evidence impact would be significant:** The MND does not provide any information as to the Project's potential impacts on monarch butterflies and overwintering habitat. CDFW is unable to comment on whether the Project would impact monarch butterflies and overwintering habitat, where impacts would occur, and if impacts would be significant.

Monarch numbers have dropped by 99 percent from an estimated 4 million butterflies just twenty years ago (CDFW 2021a). Given the precipitous decline of monarch butterflies, the monarch butterfly is currently slated to be listed in 2024 under the Endangered Species Act (CDFW 2021a). The monarch butterfly is included on CDFW's [Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) list and identified as a Species of Greatest Conservation Need in California's [State Wildlife Action Plan](#) (CDFW 2017; CDFW 2015). Additionally, Fish and Game Code section 1002 prohibits the take or possession of wildlife for scientific research, education, or propagation purposes without a valid Scientific Collection Permit issued by CDFW. This applies to handling monarchs, removing them from the wild, or otherwise taking them for scientific or propagation purposes, including captive rearing. Fish and Game Code section 1021 directs CDFW to take feasible actions to conserve monarch butterflies and the habitats they depend upon for successful migration. Lastly, Fish and Game Code section 1374 directs the Monarch Butterfly and Pollinator Rescue Program, administered by the Wildlife Conservation Board, to recover and sustain populations of monarch butterflies.

The monarch butterfly meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Impacts on the monarch butterfly may require a mandatory finding of significance because the Project would have the potential to threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines, §15065). The reduction in the number of monarch butterflies, either directly or indirectly through habitat loss, would constitute a significant impact absent appropriate mitigation. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative 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 CDFW and/or U.S. Fish and Wildlife Service (USFWS).

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 4 of 14

### Recommended Potentially Feasible Mitigation Measure(s):

**Mitigation Measure #1:** If the Project-site supports an overwintering grove/population of monarchs, CDFW recommends the City require the Project proponent to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City should require the Project proponent to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan should be submitted to the City. The Monarch Butterfly Overwintering Habitat Management Plan should provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions should include:

- *Protect:* Trees should not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal should be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs should not be removed in overwintering groves. Shrubs should be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.
- *Manage:* Management activities, such as tree trimming and mowing, should be conducted in groves from March 15 through September 15 outside of the estimated timeframe when monarchs are likely present in the southern California coast.
- *Enhance:* Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.
- *Restore:* Any trees removed as part of the Project should be replaced with trees at no less than 2:1. Native insecticide-free trees should be planted such as Monterey pine (*Pinus radiata*), Monterey cypress (*Cupressus macrocarpa*), Coast redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia*), Douglas fir (*Pseudotsuga menziesii*), Torrey pine (*Pinus torreyana*), western sycamore (*Platanus racemosa*), bishop pine (*Pinus radiata*) and others, as appropriate for location.
- *Pesticides:* Use of pesticides should be avoided, particularly when monarchs may be present. If pesticides are used, applications should be conducted from March 15 through September 15, when possible. Herbicide should not be applied on blooming flowers. Herbicide should be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods should be used, large-scale broadcast applications should be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, should not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants should not be used. Non-chemical weed control techniques should be used when possible.
- *Tropical milkweed and pathogens:* Non-native tropical milkweed should not be planted in order to minimize the spread of the pathogen *Ophryocystis elektroscirrha* (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed should be removed and replaced with native, insecticide-free nectar plants suitable for the location.

**Mitigation Measure #2:** If the Project-site does not support overwintering habitat, CDFW recommends the City require the Project proponent to avoid and minimize impacts on monarch

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 5 of 14

butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.

**Recommendation #1:** CDFW recommends the following resources for information on managing monarch overwintering habitat:

- [Western Monarch Butterfly Conservation Plan](#) (WAFWA 2019);
- [Overwintering Site Management and Protection](#) (Western Monarch Count 2021);
- [Protecting California's Butterfly Groves](#) (Xerces Society 2017);
- [Managing Monarch Habitat in the West](#) (Xerces Society 2021);
- [Monarch Butterfly Nectar Plant Lists for Conservation Plantings](#) (Xerces Society 2018);
- [Tropical Milkweed](#) (Wheeler 2018); and,
- CDFW's [Monarch Butterfly](#) webpage page (CDFW 2021a).

**Recommendation #2:** CDFW recommends the City require the Project proponent to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project's environmental document.

**Recommendation #3:** CDFW recommends the City recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.

### **Additional Recommendations**

Impacts to Bats. The Project includes activities that will result in the removal of trees and vegetation that may provide habitat for western mastiff bat (*Eumops perotis* ssp. *californicus*), a California Species of Special Concern (SSC), as identified in the BRR. The BRR states, "This species is not likely to roost on site due to the lack of suitable roosting trees or rocky habitat. Therefore, impacts to special-status wildlife would be considered less than significant."

Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within these areas (plus a 100-foot buffer as access allows) in order to identify potential foraging habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings should be provided to the City. Depending on the survey results, a qualified bat specialist should discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist should be completed and submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of foraging habitat for bats.

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 6 of 14

Impacts to Sensitive Vegetation. MM-BIO-1 in the Initial Study states, “the project applicant shall purchase restoration or creation credits of at least 2:1 (1.12 acres for 0.56 acres impacted) to mitigate the project’s impact on the sensitive-status Lemonade Berry Scrub vegetation community to a less-than-significant level.” However, section 5.1 *Minimization and Mitigation Measures for Special-Status Vegetation Communities* of the BRR states, “The project applicant, or its designee, shall provide mitigation bank funding at 3:1 (1.68 acres) to replace special-status vegetation communities (i.e., lemonade berry scrub) removed due to project construction and fuel modification activities.” CDFW supports the minimization and mitigation measure presented in the BRR to mitigate for impacts to sensitive vegetation communities.

CDFW recommends adhering to the mitigation presented in BRR where lemonade berry is replaced at a ratio of 3:1 (1.68 acres) for the off-site mitigation bank restoration/creation credits. The City should further clarify the mitigation and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City’s issuance of grading permits.

Nesting Birds. CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends expanding the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey should be conducted as stated in the Initial Study, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.

It should be noted that the temporary halt of Project activities within nesting buffers during nesting season does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. Additional mitigation would be necessary to compensate for the removal of nesting habitat within the Project site based on acreage of impact and vegetation composition. CDFW shall be consulted to determine proper mitigation for impacts to occupied habitat depending on the status of the bird species. Mitigation ratios would increase with the occurrence a California Species of Special Concern and would further increase with the occurrence of a CESA-listed species.

Rodenticides. CDFW recommends project proponent prevent the use of second-generation anticoagulant rodenticides on any project associated with the Project.

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, CDFW recommends that the subsequent CEQA document include measures where lead agencies of individual projects tiering from the subsequent CEQA document report any special status species detected during preparation of project-level environmental impact analyses/environmental documents. Special status species information should be submitted to the CNDDDB by completing the [Online Field Survey Form](#) (CDFW 2021b). The lead agency should ensure all pertinent data has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting an environmental document. The lead agency should provide CDFW with confirmation of data submittal.

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 7 of 14

Mitigation and Monitoring Reporting Plan. CDFW recommends the City update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist project proponents in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

### Filing Fees

The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

### Conclusion

We appreciate the opportunity to comment on the Project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. Questions regarding this letter and further coordination on these issues should be directed to Felicia Silva, Environmental Scientist, at [Felicia.Silva@wildlife.ca.gov](mailto:Felicia.Silva@wildlife.ca.gov) or (562) 292-8105.

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

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Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

cc: CDFW

Erinn Wilson-Olgin, San Diego – [Erinn.Wilson-Olgin@wildlife.ca.gov](mailto:Erinn.Wilson-Olgin@wildlife.ca.gov)  
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CEQA Program Coordinator, Sacramento – [CEQACommentLetters@wildlife.ca.gov](mailto:CEQACommentLetters@wildlife.ca.gov)

State Clearinghouse, Office of Planning and Research – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)



Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 8 of 14

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State of California – Natural Resources Agency  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	Timing	Responsible Party
<b>MM-BIO-1-Monarch Overwintering Habitat</b>	<p>If the Project site supports an overwintering grove/population of monarchs, the City shall require the Project proponent to protect, manage, enhance, and restore potential overwintering habitat on the Project site. The City shall require the Project proponent to prepare a long-term Monarch Butterfly Overwintering Habitat Management Plan in consultation with a qualified biologist. A Monarch Butterfly Overwintering Habitat Management Plan shall be submitted to the City before the City adopts the Century Villages at Cabrillo Specific Plan and a Long Beach Zoning Ordinance and Zoning Map Amendment. The Monarch Butterfly Overwintering Habitat Management Plan shall provide actions to protect, manage, enhance, and restore overwintering habitat. At a minimum, these actions shall include:</p> <ul style="list-style-type: none"><li>• <i>Protect</i>: Trees shall not be removed in overwintering groves unless a tree poses a safety risk. The critical root zone (CRZ) of trees that are not targeted for removal shall be protected. Impacts to a tree's CRZ could result in injury or mortality of the tree causing additional loss of trees and canopy. Shrubs shall not be removed in overwintering groves. Shrubs shall be maintained to provide a buffer to preserve the microclimate conditions of the overwinter habitat.</li><li>• <i>Manage</i>: Management activities, such as tree trimming and mowing, shall be conducted in groves from March 15 through September 15 outside of the estimated</li></ul>	Prior to Construction	City of Los Angeles

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 10 of 14

	<p>timeframe when monarchs are likely present in the southern California coast.</p> <ul style="list-style-type: none"><li>• <i>Enhance</i>: Enhance native, insecticide-free nectar sources by planting fall/winter blooming forbs or shrubs within overwintering groves.</li><li>• <i>Restore</i>: Any trees removed as part of the Project shall be replaced with trees at no less than 2:1. Native insecticide-free trees shall be planted such as Monterey pine (<i>Pinus radiata</i>), Monterey cypress (<i>Cupressus macrocarpa</i>), Coast redwood (<i>Sequoia sempervirens</i>), coast live oak (<i>Quercus agrifolia</i>), Douglas fir (<i>Pseudotsuga menziesii</i>), Torrey pine (<i>Pinus torreyana</i>), western sycamore (<i>Platanus racemosa</i>), bishop pine (<i>Pinus radiata</i>) and others, as appropriate for location.</li><li>• <i>Pesticides</i>: Use of pesticides shall be avoided, particularly when monarchs may be present. If pesticides are used, applications shall be conducted from March 15 through September 15, when possible. Herbicide shall not be applied on blooming flowers. Herbicide shall be applied during young plant phases, when plants are more responsive to treatment, and when monarchs and other pollinators are less likely to be nectaring on the plants. Whenever possible, targeted application herbicide methods shall be used, large-scale broadcast applications shall be avoided, and precautions shall be taken to limit off-site movement of herbicides (e.g., drift from wind and discharge from surface water flows). Neonicotinoids or other systemic insecticides, including coated seeds, shall not be used any time of the year in monarch habitat due to their ecosystem persistence, systemic nature, and toxicity. Soil fumigants shall not be used. Non-chemical weed control techniques shall be used when possible.</li><li>• <i>Tropical milkweed and pathogens</i>: Non-native tropical</li></ul>		
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Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 11 of 14

	<p>milkweed shall not be planted in order to minimize the spread of the pathogen <i>Ophryocystis elektroscirrha</i> (OE), and to encourage natural monarch migration. OE can build up on tropical milkweed because these plants are evergreen, and they do not die back in the winter. OE can be debilitating and/or lethal to monarchs. If possible, tropical milkweed shall be removed and replaced with native, insecticide-free nectar plants suitable for the location.</p>		
<b>MM-BIO-2- Monarch Overwintering Habitat</b>	<p>If the Project site does not support overwintering habitat, the City shall require the Project proponent to avoid and minimize impacts on monarch butterflies by enhancing native, insecticide-free nectar sources; avoid planting any additional tropical milkweeds; and avoid using pesticides, insecticides, and soil fumigants.</p>	Prior to Construction	City of Los Angeles Project Proponent
<b>REC-1- Monarch Overwintering Habitat</b>	<p>CDFW recommends the following resources for information on managing monarch overwintering habitat:</p> <ul style="list-style-type: none"> <li>• <a href="#">Western Monarch Butterfly Conservation Plan</a> (WAFWA 2019);</li> <li>• <a href="#">Overwintering Site Management and Protection</a> (Western Monarch Count 2021);</li> <li>• <a href="#">Protecting California's Butterfly Groves</a> (Xerces Society 2017);</li> <li>• <a href="#">Managing Monarch Habitat in the West</a> (Xerces Society 2021);</li> <li>• <a href="#">Monarch Butterfly Nectar Plant Lists for Conservation Plantings</a> (Xerces Society 2018);</li> <li>• <a href="#">Tropical Milkweed</a> (Wheeler 2018); and,</li> <li>• CDFW's <a href="#">Monarch Butterfly</a> webpage page (CDFW 2021a).</li> </ul>	Prior to Construction	City of Los Angeles
<b>REC-2- Monarch Overwintering Habitat</b>	<p>CDFW recommends the City require the Project proponent to retain a qualified biologist to conduct an overwintering grove habitat and impact assessment for</p>	Prior to Construction	City of Los Angeles Project Proponent

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 12 of 14

	the Project site. The qualified biologist should conduct season appropriate surveys to determine if the Project site supports overwintering groves/monarch population. The assessment should provide information on where overwintering habitat is located; what Project activities would impact overwintering habitat; what are the impacts (e.g., number and species of trees removed); where impacts would occur; and measures to avoid, minimize, or mitigate for those potential impacts. CDFW recommends the City require an assessment to be performed prior to finalizing the Project's environmental document.		
<b>REC-3- Monarch Overwintering Habitat</b>	CDFW recommends the City recirculate the Project's environmental document after the habitat assessment to disclose information on monarch butterflies and potential overwintering habitat in the Project site; potential impacts on those biological resources; and measures to avoid, minimize, or mitigate for Project impacts.	Prior to Construction	City of Los Angeles
<b>REC-4-Impacts to Bat Species</b>	Prior to construction activities, a qualified bat specialist shall conduct bat surveys within the Project area (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be provided to the City. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and	Prior to Construction	Project Proponent

Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 13 of 14

	submitted to the City prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of foraging habitat for bats.		
<b>REC-5-Impacts to Sensitive Vegetation</b>	CDFW recommends adhering to the mitigation presented in BRR where lemonade berry is replaced at a ratio of 3:1 (1.68 acres) for the off-site mitigation bank restoration/creation credits.	Prior to Construction	Project Proponent
<b>REC-6- Impacts to Sensitive Vegetation</b>	The City should further clarify the mitigation and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City's issuance of grading permits.	Prior to Construction	Project Proponent
<b>REC-7-Nesting Birds</b>	CDFW recommends avoiding any construction activity during nesting season. If not feasible, CDFW recommends modifying the time period for bird and raptor nesting from February 1 through August 31 to January 1 through September 15. If the Project occurs between January 1 through September 15, a nesting bird and raptor survey shall be conducted as stated in MM BIO-2, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any vegetation removal within the Project site.	Prior to Construction	Project Proponent
<b>REC-8-Rodenticides</b>	CDFW recommends the City exclude the use of second-generation anticoagulant rodenticides for all subsequent individual projects.	During the life of the Project	Project Proponent
<b>REC-9-Data</b>	Project-level lead agencies shall ensure sensitive and special status species data has been properly submitted to the <a href="#">California Natural Diversity Database</a> with all data fields applicable filled out. Confirmation of data submittal shall be provided to CDFW.	Prior to Construction	Project Proponent
<b>REC-10- Mitigation and Monitoring Reporting Plan</b>	The City should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures	Prior to finalizing MND	Project Proponent

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Makan Baranghoori  
City of Los Angeles  
September 16, 2021  
Page 14 of 14

	recommended in this letter. the City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.		
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# Attachment B

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California Department of Fish and Wildlife Comment Letter  
(dated May 25, 2021)



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 92123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



May 25, 2021

Makan Baranghoori  
City of Los Angeles  
Department of City Planning  
201 N. Figueroa Street  
Los Angeles, CA 90012  
[Makan.Baranghoori@lacity.org](mailto:Makan.Baranghoori@lacity.org)

**Subject: Comments on Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, Los Angeles County**

Dear Makan Baranghoori:

The California Department of Fish and Wildlife (CDFW) has reviewed the Revello Drive and Tramonto Drive Residential Project (Project) proposed by the City of Los Angeles (City; Lead Agency). Supporting documentation for the Project includes an Initial Study / Mitigated Negative Declaration (IS/MND) and *Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California* (Dudek 2021). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW's Role**

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish

*Conserving California's Wildlife Since 1870*



Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 2 of 6

& G. Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

## Project Description and Summary

**Objective:** The Project proposes the construction of four single-family residences on 12 vacant parcels of land in the Pacific Palisades neighborhood of Los Angeles. During construction, there will be two primary staging and parking areas. The first staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The second staging/parking area will be a relatively flat pad that is approximately 36 feet wide and 180 feet long. Project-related activities include grading, terracing, vegetation clearing, and house construction. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

**Location:** The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County. The Project is south of Tramonto Drive, west of Sunset Boulevard, and north of the Pacific Coast Highway (PCH) at approximately 0.2-mile northwest of the intersection of Sunset Boulevard and PCH. The Los Angeles County Assessor's Parcel Numbers (APN) associated with the Project are: 4416-011-003, 4416-011-004, 4416-011-006, 4416-021-003, 4416-021-004, 4416-021-005, 4416-021-006, 4416-021-007, 4416-021-008, 4416-021-015, 4416-021-016, and 4416-021-060.

## Comments and Recommendations

The City submitted Project-related documents for an informal consultation with CDFW on April 20, 2021 [CEQA Guidelines, § 15063(g)]. Biological surveys of the Project site were performed on November 12, 2019, June 16, 2020, and February 1, 2021 (Biological Resources Letter Report). The Biological Resources Letter Report (BRLR) was intended to "1) describe the existing conditions of biological resources within the project site in terms of vegetation, flora, wildlife, and wildlife habitats; 2) quantify impacts to biological resources that would result from implementation of the proposed project and describe those impacts in terms of biological significance in view of federal, state, and local laws and policies; and 3) recommend mitigation measures for impacts to sensitive biological resources."

After reviewing the IS/MND and BRLR, CDFW offers the comments and recommendations below to assist the City in adequately identifying the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the City consider our comments and recommendations when preparing an environmental document that may provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151].

## Specific Comments

1. Impacts to Sensitive Vegetation. According to *Table 3 – Impacts to Vegetation Communities and Land Cover Types in the Study Area* of the BRLR, the proposed Project will impact 0.56 acres of lemonade berry scrub (*Rhus integrifolia*). Lemonade berry scrub is considered by CDFW as a [Sensitive Natural Community](#) (CDFW 2021a) and is listed by California Native Plant Society (CNPS) as having a rarity ranking of S3 (CNPS 2021).

Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 3 of 6

CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21 to 80 occurrences of this community in existence in California. Impacts to sensitive vegetation communities should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative 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 CDFW or U.S. Fish and Wildlife Service (USFWS).

Mitigation Measure MM-BIO-1 of the Initial Study/Mitigated Negative Declaration (IS/MND) offers three options for mitigation for impacts to special-status vegetation communities (i.e., lemonade berry scrub). They can be summed up as:

Option 1: Mitigation Bank Funding – Project proponent will purchase credits at a mitigation bank within City limits at a ratio of 1:1 for impacts to 0.56 acres of lemonade berry scrub. If purchasing credits at a mitigation bank outside of City limits, then credits will be sought at 2:1 (1.12 acres).

Option 2: Off-site Land Acquisition, Preservation, and In-Kind Habitat Creation/Restoration – Project proponent will purchase lands having either at least 0.56 acres (1:1 for acres impacted) of lemonade berry scrub or have the potential to support the creation of 0.56 acres of lemonade berry scrub on-site.

Option 3: Off-site Land Acquisition, Preservation, and Out-of-Kind Habitat Restoration – If acquisition of property within City limits with existing lemonade berry scrub or the potential to support creation of lemonade berry scrub is not feasible, Project proponent will purchase property at a ratio of 2:1 (1.12 acres) for another vegetation community within the California maritime chaparral group.

**Recommendation:** Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency (CEQA Guidelines, § 15041). A public agency shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures (Pub. Resources Code, § 21081.6). Therefore, CDFW recommends the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). CDFW recommends updating the MND to provide adequate and complete disclosure of information that would tie mitigation measures to the resources being impacted via the following:

- 1) What specific biological resources would the mitigation measures be protecting or conserving;
- 2) What performance measures the proposed mitigation would achieve (CEQA Guidelines, § 15126.4);
- 3) What type(s) of potential action(s) that can feasibly achieve those performance standards (CEQA Guidelines, § 15126.4);
- 4) How suggested mitigation measures are designed to reduce impacts to below a level of

Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 4 of 6

significance;

- 5) Where mitigation is intended to occur. If off-site, where land would be acquired or where the mitigation bank is located; and
- 6) When the mitigation efforts would begin and be completed in relation to timeline of the Project.

**Recommendation:** All mitigation measures should be clearly identified, defined, and executed prior to the initiation of Project-related activities.

**Recommendation:** CDFW recommends avoiding impacts to sensitive natural communities. If avoidance is not feasible, then on-site restoration or creation should be at least 2:1 (1.12 acres created for 0.56 acres impacted) to account for loss of impacted vegetation and temporal loss (at least 36 months). Should on-site restoration not be feasible, then purchase of mitigation credits or off-site land acquisition should be at least 3:1 to account for the loss of sensitive natural communities in proximity to the Project site.

**Recommendation:** Should the purchase of mitigation credits be used as mitigation for the Project, CDFW recommends purchasing restoration or creation credits and not enhancement or preservation. The City should further clarify the mitigation option to be chosen and identify the type of mitigation credits purchased in relation to this Project. Mitigation bank credits should be purchased, approved, or otherwise fully executed prior to implementing Project-related ground-disturbing activities and prior to the City's issuance of grading permits.

2. Non-Native Plants and Landscaping. The proposed Project will involve significant landscaping throughout the Project site for aesthetic purposes. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site, similar to species found in adjacent natural habitats.

**Recommendation:** If the Project may involve landscaping, CDFW recommends the IS/MND provide the landscaping plant palette and restrict use of species listed as 'Moderate' or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2021). These species are documented to have substantial and severe ecological impacts on physical processes, plant and animal communities, and vegetation structure.

**Recommendation:** If non-native invasive plants are on site, CDFW recommends the IS/MND provide measures to reduce the spread of non-natives during Project construction and activities. Spreading non-native plants during Project activities may have the potential to impact areas not currently exposed to non-native plants. This could result in expediting the loss of natural habitats in and adjacent to the Project site and should be prevented.

## General Comments

1. Data. CDFW recommends the City report any special status plants and wildlife species, and sensitive plant communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2021b).

Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 5 of 6

2. **Mitigation Measures.** Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Mitigation measures must be feasible, effective, implemented, and fully enforceable by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, §§ 15126.4, 15041). In preparation of an environmental document, CDFW recommends that the City prepare mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6).

## Conclusion

CDFW appreciates the opportunity to provide early comments and recommendations regarding the Project to assist the City of Los Angeles in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW looks forward to reviewing an ensuing Project-related environmental document. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at [Andrew.Valand@wildlife.ca.gov](mailto:Andrew.Valand@wildlife.ca.gov) or (562) 292-6821.

Sincerely,

DocuSigned by:

*Erinn Wilson-Olgin*

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Erinn Wilson-Olgin  
Environmental Program Manager I  
South Coast Region

cc: CDFW

Victoria Tang, Los Alamitos – [Victoria.Tang@wildlife.ca.gov](mailto:Victoria.Tang@wildlife.ca.gov)  
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## References

- [Cal-IPC] California Invasive Plant Council. 2021. The Cal-IPC Inventory. Available from: <https://www.cal-ipc.org/plants/inventory/>
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Makan Bharanghoori  
City of Los Angeles  
May 25, 2021  
Page 6 of 6

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## **Comments and Response to Comments**

### **C-2 California Coastal Commission (CCC)**



**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
301 E Ocean Blvd, Suite 300  
Long Beach, CA 90802-4302  
(562) 590-5071



April 13, 2022

Los Angeles City Planning  
Juliet Oh, Senior City Planner  
200 N. Spring St., Room 721  
Los Angeles, CA 90012

Delivered via electronic mail: [Juliet.Oh@lacity.org](mailto:Juliet.Oh@lacity.org)

**Re: Revello Drive and Tramonto Drive Residential Project**  
**Coastal Commission Staff Comments on MND and Other Case Documents**  
**Case No. ENV-2019-5520-MND**

Dear Juliet Oh:

Coastal Commission staff appreciate the opportunity to review and provide comment on the Mitigated Negative Declaration (MND) and other case documents of the Revello Drive and Tramonto Drive Residential Project (Project).

This letter provides an overview of the main issues Commission staff have identified at this time based on the information that has been presented, in a preemptive effort to ensure that the proposed project conforms with Chapter 3 policies of the Coastal Act, as required per Section 30604. The comments contained herein are preliminary in nature, and those of Coastal Commission staff only, and should not be construed as representing the official opinion of the Coastal Commissioners.

**Comments:**

1.) Geology & Soils, Water Quality, and Coastal Hazards

a.) *Geology and Soils*

The subject site is located in an area of high threat of landslides, uncontrolled runoff, and wildfire, which are particular issues of concern in terms of Coastal Act Section 30253(a). In terms of geological susceptibility, the project as currently proposed may cause or contribute to erosion, liquefaction, and surface rupture. The four proposed residences will be atop the Tramonto Landslide, which has periodically reactivated and spread laterally across the site and resulted in the ultimate destruction of truncated segments of Castellammare Drive, Posetano Road, and Revello Drive in 1959. Tramonto Drive, which was also affected, was restored in 1969 with a bulkhead shoring wall to buttress a headscarp failure, and an above-grade storm drain system was reconnected to allow for runoff control.

The four residences will be centrally located within the Tramonto Landslide zone and the disturbed/disarticulated blocks of the Topanga Formation conglomerate materials. The site is underlain with shallow bedrock, siltstone, sandstone with interbedded shale

and large units of conglomerate. To reach stable strata that would allow for residential development at the site, the applicant's geotechnical consultants recommend foundational piles or caissons be installed to depths 40 - 60 feet below grade to support the proposed structures. On Page 9 of the MND, it is stated that "the total grading for the project, including that required for offsite street improvements, is approximately 29,148 CY, of which 28,341 CY is remedial grading and approximately 33,794 CY would be exported/transported from the Project site (inclusive of an allowance amount for the expansion of soil)." In a site visit on December 9, 2021, Commission staff witnessed site conditions that suggested that substantial grading and removal of vegetation had already taken place without the benefit of a coastal development permit.

Generally, the mitigation measures proposed as part of the project (MM-GEO-1) account for the geologic site conditions and the underlying instability of the Tramonto Landslide. However, the current proposal for assuring stability and structural integrity, including extensive grading to unload the landslide and the use of deep shear pins, caisson foundations, and large retaining walls, could result in substantial destruction of the site, natural landform alteration, and construction of bluff protective devices. Part of the issue is the inherent conflict between the need to minimize landform alteration and bluff retention in Coastal Act Section 30253(b) and the City of Los Angeles Department of Building and Safety (LADBS) Grading Division's Order to Comply dated October 28, 2019. The Grading Division's Order to Comply directs the applicant to fulfill corrective measures to stabilize Class I slope failure on the property, as detailed in the Geology and Soils Report Approval Letter dated September 14, 2020, in an effort to control slope stability. The applicant asserts that the Order to Comply is binding and does not allow flexibility to design the project with the minimization of landform alteration and bluff retention devices in mind.

The applicant must show that the currently proposed grading and stabilization structures (caissons and retaining walls) are the minimum necessary landform alteration to satisfy stability standards and the Order to Comply. The applicant should provide an alternatives analysis that explores options to reduce landform alteration. Commission staff also note that the project proposal includes basements for each of the four residences. At the proposed sizes (5,887 sq. ft., 5,096 sq. ft., 2,428 sq. ft., and 7,949 sq. ft., respectively), the basements may act as bluff retention devices that may be difficult to remove under certain slope failure scenarios. In short, Commission staff ask the applicant to, at least, analyze the following project alternatives:

1. A scenario where the caissons are proposed to be as close to the residences as possible. In past Commission actions, applicants have been required to demonstrate that the caissons stabilize the footprint of the homes, rather than the whole site, to the extent feasible.
2. A scenario that partially daylights the basements and/or removes them entirely from the proposal.
3. A scenario that supports the residences on pier foundations that would allow for continued slope movement above the existing failure plane.
4. Smaller home sizes and/or clustering of the development.

Where these alternatives are infeasible, the applicant should explain in depth the rationale. The applicant should also describe in greater depth the slope retention methods (such as retaining walls) proposed to stabilize the Revello Drive extension.

b.) *Hazards and Hazardous Materials*

The project is located in a high fire hazard area. The City designates the area as a Very High Fire Hazard Severity Zone (VHFHSZ). On-street parking will be limited or prohibited along the Revello Drive extension as a result, pursuant to Chapter VIII of the uncertified Los Angeles Municipal Code. However, the MND identifies wildfire risk to be less than significant. Page 127 of the MND asserts that “a vegetation fire on the Project site would have a relatively short burn time, since the Project site is not located within a wildland area and is surrounded by development. As such, the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors.” Coastal Act Section 30253(a) requires the minimization of risk to life, in addition to property, in areas of high fire threat. As such, Commission staff ask the applicant to analyze the risk of wildfire threat to life and property at the site, including any necessary mitigation and adaptation strategies (fireproofing, weatherization, fuel modification, emergency irrigation systems, etc.). There should be discussion of how such mitigation and adaptation strategies minimize the threat of wildfire hazard at the site and in the surrounding area.

2.) Biological Resources and Environmentally Sensitive Habitat Area (ESHA)

The Commission has found that certain coastal bluffs and canyons in Pacific Palisades area and the Santa Monica Mountains are classified as Environmentally Sensitive Habitat Area (ESHA) per Coastal Act Section 30240. Typically, these areas are undeveloped and include extensive, connected habitat areas that are relatively undisturbed. The MND asserts that the subject area is in a developed, subdivided location where past landslides, grading, and vegetation removal have impacted habitat. In particular, it is stated that the impact to lemonade berry scrub would be less than significant due to extensive disturbance of this vegetation community. After the December 9, 2021 site visit and visible evidence of unpermitted grading and plant removal, Commission staff called into question the assertion that the site has been degraded over the long-term and/or without significant habitat values. In previous discussions, Commission staff expressed to the applicant and City staff that even under circumstances where habitat may be degraded, it may still be considered ESHA. Furthermore, as evidenced from historic satellite imagery, prolific lemonade berry stands covered the site as recently as January 2020. Thus, the Commission’s staff ecologist has determined the potential for ESHA to exist on the site.

The applicant submitted a memorandum prepared by Dudek on March 25, 2022 investigating the potential for ESHA at the project site. Dudek conducted a vegetation community and land cover mapping of the site in November 2019 using online datasets. The dataset revealed that vegetation communities classified in the California Department of Fish and Wildlife (CDFW) List of California Terrestrial Natural Communities, mainly lemonade berry scrub and disturbed quailbush scrub, were highly degraded by human activities and development. In February 2021, Dudek conducted a subsequent

supplementary assessment of vegetation communities in the area to refine earlier vegetation mapping efforts using a “semi-quantitative” method, which further substantiated fragmentation, high cover of non-native species, and other anthropogenic disturbances.

A more extensive analysis of the potential for ESHA will need to be conducted as part of the Coastal Commission CDP process. Nevertheless, at this preliminary stage, Commission staff call into question whether the aforementioned disturbance factors would necessarily qualify the site as *not* ESHA. As the Dudek memo correctly notes, lemonade berry scrub alliance has a rank of S3 rarity by CDFW, and quailbush scrub alliance has a rank of S4 rarity. As such, prior to the Commission’s CDP application process, Commission staff urge the applicant to work with CDFW and other relevant resource agencies to establish criteria for sensitive habitat identification and management at the site. In addition, Commission staff would appreciate a reconstruction of the most probable ecological landscape at the site prior to recent human disturbance and vegetation clearing. Detailed discussion of the sensitive species inferred to be onsite should be included. Since there may not be enough evidence to definitively conclude the historic prevalence of specific ecological niches, geobiological gradients, and ecotones onsite, then specific mitigation, restoration, and/or habitat creation frameworks/metrics should also be developed in response to past, present, and future habitat degradation. If fuel modification is required for the project, the applicant should additionally outline the balance between reducing fire hazards and enhancing biological diversity and sensitive species at the site. For additional information regarding ESHA in the Santa Monica Mountains, please refer to the following Commission ESHA memo: <https://www.coastal.ca.gov/ventura/smm-esh-memo.pdf>.

### 3.) Other Coastal Act Considerations

#### a.) *Utilities/Service Systems*

Coastal Act section 30250 states that “new residential... shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services.”

The lots on which the proposed homes will be developed are currently vacant. The subject lots have never been developed with residences, and the roads that were truncated by the Tramonto Slide finally closed by 1959. As such, there are very few and limited utility systems serving the parcels, such as installation of streets, sewers, water lines, telecommunication systems, gas, electric, sanitation, etc. The only exception is a stormwater inlet at the eastern terminus of the site near 17526 Revello Drive, which currently directs drainage onto PCH downslope and will incorporate water runoff from the new proposed residences.

The MND goes into some depth regarding the proposed utility systems proposed for the site. For instance, LADWP would treat wastewater and provide electrical and potable water services, solid waste would be collected by LA Sanitation, natural gas would be provided by SoCalGas, and telecommunication facilities would be provided

by existing networks in the surrounding area. While the report states that transmission and distribution conduits, systems, storage facilities, metering, and billing will be made available for a variety of necessary utility services, it is not clear how those would be established in the first place. Additional discussion of how the applicant or City intends to facilitate the establishment of utility and service systems at the site, and how such systems would be consequently integrated into the proposed residences is not provided.

There should be additional discussion of the Title 24 (California Green Building Code) and CPUC requirements or measures taken to make the development more sustainable; the applicant should detail any proposal for LEED certification, installation of solar panels, greywater treatment and filtration, use of high-efficiency appliances and fixtures, low-water irrigation, and other measures to decrease energy consumption as required by Section 30253(d) of the Coastal Act. Such analysis would help Commission staff determine whether the project complies with Coastal Act Sections 30250 and 30253(c) and (d).

b.) *Scenic and Visual Resources*

The Coastal Act protects public views and the scenic and visual qualities of coastal areas. Here, public views in the vicinity of the subject site may exist from the existing and proposed public streets to the Pacific Ocean and from Pacific Coast Highway and Will Rogers State Beach to the Santa Monica Mountains. Section 4.I of the MND states that the proposed project will have less-than-significant impact on aesthetics (i.e., scenic and visual resources). On Page 54, the MND states that “due to the steep slope present between State Route 1 [PCH] and the Project site, the proposed residences would not be prominently visible from this location.”

In order to ensure that prominent structural elements (e.g., caissons, piles, bluff retention devices, and other potential obtrusive features) of the proposed residences will not be visible along PCH and the adjacent beach, nor from any public roadways, or parklands, the applicant should prepare a visual analysis to simulate the potential impacts. Visual analysis should be conducted from a variety of angles, public vantage points, and topographical reliefs. Existing development and landscape features should be accounted for, but vegetation clearance or removal should not positively factor in the enhancement of scenic values or determination of visual obstruction. Public views of the coast are prioritized, and therefore, visual obstruction from public roadways is of biggest concern. Finally, the applicant should also study the potential for caisson or pile exposure over the life of the development via erosion-rate modeling. If the caissons are likely to be exposed, then the applicant should analyze mitigation measures that visually and aesthetically treat the piles to match the surrounding terrain, or otherwise install a skirt to cover the exposed piles. Vegetation and landscaping proposals should also be included as part of the discussion of consistency of the project with Section 30251 of the Coastal Act.

c.) *Transportation, Access, Circulation, and Parking*

It is unclear whether parking, as currently proposed, would adequately serve the new development and resultant parking demand. Information regarding the proposed number of off-street parking spaces for each residence, as well as on-street parking for the Revello Drive extension, was missing in the MND and Appendix H (Traffic Management Plan). Thus, to comply with Section 30252(4) of the Coastal Act, the applicant should provide the number of parking spaces for each of the four residences and how many on-street parking spaces will be available to the public with the road extension, if any.

d.) *Tribal Cultural Resources*

Appendix E to the MND contains a Cultural Resources Report that discusses both historic and tribal cultural resources within the vicinity of the project site. Dudek conducted a California Historical Resource Information System (CHRIS) records search in order to satisfy CEQA and Assembly Bill (AB) 52 requirements. The CHRIS records search yielded three “prehistoric” resources within at most 0.46 miles of the project site, with one deposit in particular being 0.18 miles to the northeast of the site. The found deposits are midden, most likely associated with village sites that were previously destroyed. This finding suggests that there is a high likelihood that tribal cultural resources could be found on site. The applicant has not conducted their own investigation and relies on 31 previous cultural resource studies in the vicinity instead. No previous investigation is known to have been conducted on the project site itself. It is important to further specify in the case documents the excavation methods proposed, given that substantial ground disturbance is anticipated for this potentially sensitive site.

The Coastal Commission has adopted a tribal consultation policy to avoid or minimize impacts to coastal resources and ensure all voices are heard in the development process. The Commission’s Tribal Consultation Policy may be found here: [www.coastal.ca.gov/env-justice/tribal-consultation/](http://www.coastal.ca.gov/env-justice/tribal-consultation/). Page 121 of the MND states: “the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period. No response was received.” It is not clear if the City followed the protocol for tribal consultation laid out in the Commission’s policy. It is also not clear what procedures were taken to determine that no affected tribe was interested in consultation. If the City has not done so already, Commission staff strongly recommends the City reach out to the California Native American Heritage Commission (NAHC) and/or the State Historic Preservation Office (SHPO) to obtain a Sacred Lands File (SLF) for the project site, use multiple communication methods to try to get in touch with Native American groups on the NAHC contact list, and meaningfully engage with such groups.

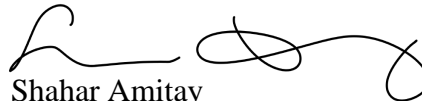
As a result of meaningful engagement with such groups and given the likelihood that tribal cultural resources exist onsite, the City may need to recommend or require avoidance of impacts to tribal cultural resources, which can include but are not limited to archeological resources, biological resources, and scenic resources. If avoidance is



not possible, impacts must be minimized through modifications to the project and/or other mitigation measures to ensure compliance with Coastal Act Chapter 3 policies, particularly Section 30244. Tribal cultural resource mitigation measures should be devised in consultation with affected tribes, and in a case that no consultation occurs, then at minimum, the applicant should require Native American monitoring of any ground disturbing activities, coordinate with Native American groups, if feasible, to conduct significance testing and data recovery in the least environmentally and culturally damaging manner possible, and prepare a contingency plan for avoidance and reburial of any tribal cultural resource deposits discovered during project activities, if protection-in-place is preferred to recovery by the affected tribes.

Please note that the comments provided herein are preliminary in nature. Additionally, the comments contained herein are those of Coastal Commission staff only and should not be construed as representing the opinion of the Coastal Commissioners. Thank you again for the opportunity to comment on the MND and other case documents related to the Project. If you have any questions or concerns, please do not hesitate to contact us at the Coastal Commission's Long Beach office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shahar Amitay', with a stylized, flowing script.

Shahar Amitay  
Coastal Program Analyst

cc: Makan Baranghoori, City of Los Angeles  
Jordann Turner, City of Los Angeles  
Greg Demos, Demos Development  
Tony Russo, Crest Real Estate  
Joseph Street, California Coastal Commission  
Jonna Engel, California Coastal Commission  
Shannon Vaughn, California Coastal Commission  
Eric Stevens, California Coastal Commission  
Dani Ziff, California Coastal Commission



14809 Pacific Coast Highway  
Santa Monica, CA 90402

April 25, 2022

Los Angeles City Planning Department  
c/o Makan Baranghoori  
200 N. Spring Street, Room 720  
Los Angeles, CA 90012  
[makan.baranghoori@lacity.org](mailto:makan.baranghoori@lacity.org)

Re: DIR-2019-6352-CDP-MEL for  
17538, 17544, 17550 Tramonto Drive ("SHP 1")  
DIR-2019-5524-CDP-MEL and ZA-2019-5525-ZAD for  
17532, 17540, 17548 Revello Drive ("SHP 2")  
DIR-2019-5571-CDP-MEL; ZA-2019-5574-ZAD for  
17523, 17529 Revello Drive ("JDR 1")  
DIR-2019-5584-CDP-MEL and ZA-2019-5585-ZAD for  
17533, 17537, 17541, 17547 Revello Drive ("JDR 2")  
ENV-2019-5520-MND  
(collectively referred to as the "development" or the "project")

City Planning,

On behalf of Springhouse Hamilton Park, LLC and JDR Revello LLC (collectively "Applicant"), I write in response to Coastal Commission Staff's letter of October 13, 2022 (see Exhibit 1). For ease of reference, the nomenclature corresponding to the specific responses below coincide with that used by Coastal Commission Staff ("Staff"). The exhibits referenced herein can be accessed via the download link at the bottom of this letter.

#### 1a. Response to Staff Comments Regarding Geology and Soils

There are several incorrect or misleading statements made by Staff that should be corrected for the record. First, Staff states "[i]n terms of geological susceptibility, the project as currently proposed may cause or contribute to erosion, liquefaction, and surface rupture." This statement is not true.

The geologic stability of the project site has been studied and analyzed ad nauseum. The proposed development is not located in a liquefaction area but is in an active landslide. The project proposes ground improvements that will remediate the slope failures occurring within the limits of the proposed development site. In addition, the project also proposes building structures, sloped hardscapes and graded softscapes that would capture and convey water runoff into an approved drainage device (i.e. the existing aboveground storm drain pipe in front of 17526 Revello Drive). As such, the proposed development would make the site far less susceptible to erosion and surface rupture compared to its current condition.

Second, Staff states “[i]n a site visit on December 9, 2021, Commission Staff witnessed site conditions that suggested that substantial grading and removal of vegetation had already taken place without the benefit of a coastal development permit.”

To suggest that substantial grading had already taken place is unequivocally not true. Applicant has never performed grading work on any lot included in the proposed development. However, Applicant has drilled several deep borings on these lots that required the use of heavy track-mounted machinery.

The attached site photos were taken in April 2009 by the City of Los Angeles, Bureau of Engineering (see Exhibit 2). These pictures were provided to Applicant under a CPRA request. The topography and grade conditions shown in these pictures resembles that of today’s conditions.

The attached LADBS Information Bulletin provides rules and regulations that apply to subsurface exploratory work (i.e. borings) on hillside lots (see Exhibit 3). Page 3 states: “[e]xploratory borings, less than 30 inches in diameter, and test pits that are performed under the direction of a licensed engineer or geologist do not require a grading permit. Any other grading work, such as to create access roads or equipment pads, requires a grading permit.” No access roads or equipment pads were created, and the borings performed were done with a 24-inch diameter bucket auger under the supervision of Stoney Miller Consultants, a license engineer and geologist. Thus, a permit to perform these borings was not required.

As discussed during a call with Staff on February 3, 2022, Applicant made the decision to clear these three Tramonto lots for several reasons. Applicant received numerous complaints from the neighborhood regarding the disturbance caused by the nefarious activities committed by the people illegally trespassing and loitering on these properties. These activities included smoking, drinking, doing drugs, having small camp-fires and even sleeping on a couch that was brought to the site. The paraphernalia found on these Tramonto properties corroborated the neighbor’s statements. The canopies from the taller brush on these properties provided cover for them to commit these illegal activities. In addition, these activities posed significant liability and danger for the Applicant and neighborhood (i.e. potential brush fires and an increased number of car break-ins and even assaults). As a result, Applicant cleared these three properties in late November 2020 during the height of the pandemic.

It is also worth noting that the LAFD minimum brush clearing requirements call for a substantial removal of vegetation from any property in a high fire hazard severity zone such as these Tramonto lots, which includes the cutting of grass so that it is no more than three inches and the trimming of any shrub or tree from the ground to one-third of its total height up to six feet (see Exhibit 4, page 4). In years past, Applicant did not meet such minimum requirements and was cited by LAFD (see Exhibit 5).

As discussed in the published Initial Study with Mitigative Negative Declarations (the “IS-MND”), the sensitive habitat consisting of the lemonade berry scrub community on these Tramonto properties is significantly disbursed, which makes sense given Applicant’s preceding comments. According to Dudek’s GIS Division, 3,297.3 square feet of the disturbed lemonade berry scrub was cleared from these three Tramonto properties. Additionally, no protected trees were removed as no protected trees exist on the site per Applicant’s tree report dated September 13, 2019, which was subsequently approved by LA Urban Forestry Division shortly thereafter.

The attached aerial map from the IS-MND shows the site boundaries and the disbursed lemonade berry scrub areas (see Exhibit 6). The three Tramonto lots that were cleared are outlined in blue on this map. To offset the sensitive habitat removed from these properties, Applicant offered, on

February 25, 2022, to make immediate arrangements with the CDFW approved mitigation bank (Soquel Canyon) to replace the severely disbursed lemonade berry scrub community with a pristine community on a 2:1 basis which is 6,595 square feet or 0.15 acres of habitat. To date, Applicant has not heard back from either Planning or Staff regarding Applicant's offer.

It should be made clear that Applicant's environmental consultant, Dudek, thoroughly documented the existing vegetation across the entire project site prior to the clearing of these Tramonto lots as per their site visits on November 12, 2019 and June 16, 2020 referenced in their various reports.

Staff states that "[t]he applicant must show that the currently proposed grading and stabilization structures (caissons and retaining walls) are the minimum necessary landform alteration to satisfy stability standards and the Order to Comply."

In June 2019, Applicant initially submitted geology and soil reports prepared by Stoney Miller for the proposed project to the Los Angeles Department of Building and Safety ("LADBS") Grading Division for review. These reports proposed a slope stabilization plan that included what the Applicant and their consultants initially believed to be the absolute minimum necessary ground improvements (i.e. grading work, piles and retaining walls) to remediate the slope failures occurring on these properties in order to comply with their respective Orders to Comply issued by the City of Los Angeles. The LADBS Grading Division issued correction letters dated July 25, 2019 stating that the proposed stabilization plan was deficient for a variety of reasons and did not satisfy the minimum stability standards (see Exhibit 7).

Over the next 14 months, Applicant submitted nine additional geology and soil reports to the LADBS Grading Division. Each supplemental report proposed incremental changes to the then operative slope stabilization plan based only on that which were required by the LADBS Grading Division per their review of such report at that time. In September 2020, the LADBS Grading Division issued an approval letter for a stabilization plan that requires substantial excavations, numerous retaining walls and multiple rows of piles placed under and outside the proposed building envelopes (see Exhibit 8).

As demonstrated by the number of additional reports prepared by Applicant's geo. consultants, Applicant made every attempt to perform what they then believed to be the minimum necessary landform alteration to satisfy the stability standards and the Orders to Comply. This was also confirmed on February 23, 2022 during the 14-person conference call Applicant had with Staff, the LADBS Grading Division and the Bureau of Engineering, Geotechnical Division to discuss the possibility of reducing the scope of work required under the approved stabilization plan and, in particular, the amount of landform alteration and protective devices outside the building envelopes.

During the call, the LADBS Grading Division stated they would not approve any proposed stabilization plan that would reduce the amount of grading work or the number of piles outside of the proposed building envelopes as this work is required to: (1) achieve the minimum factors of safety for the entire development site required by LADBS; (2) achieve the minimum factors of safety to protect the public right-of-way fronting the development site required by LADBS and the BOE; (3) remediate the slope failures occurring on these properties and comply with the respective Orders to Comply issued by the City of Los Angeles; and (4) allow for the future development of the vacant lots directly below once this site has been stabilized.

Staff states "[t]he applicant should provide an alternatives analysis that explores options to reduce landform alteration." On March 23, 2022, the Applicant sent Planning and Staff an analysis that explored eleven different development and slope stabilization alternatives (see Exhibit 9). Each alternative was thoroughly considered as to their feasibility by the relevant project consultants.

The four alternatives identified under 6A, 6B, 7A and 7B are all feasible in that each alternative allows the property owners to comply with their respective OTC and meet the minimum safety factors required under the law. However, the one that requires the least amount of grading work and that which is least impactful, both visually and environmentally, is Alternative 6B, which is the current proposed development and stabilization plan. The relevant quantities for each alternative are summarized in the attached table (see Exhibit 10). The Site Plans that conceptually illustrate the feasible alternatives are also attached (see Exhibit 11). A summary of each alternative is described below.

- Alternative 1 consists of no piles, no homes and no remediation work to the entire site;
- Alternative 2 consists of no piles, no homes and the complete removal and compaction of the disturbed landslide material across the entire site;
- Alternative 3 consists of piles across the entire site with no homes;
- Alternative 4A consists of building 12 smaller homes propped-up on the slope with no basements supported by piles under, but not outside, each home;
- Alternative 4B consists of building 4 larger homes propped-up on the slope with no basements supported by piles under, but not outside, each home;
- Alternative 5A consists of building 12 smaller homes at street level with basements supported by piles under, but not outside, each home;
- Alternative 5B consists of building 4 larger homes at street level with no basements supported by piles under, but not outside, each home;
- Alternative 6A consists of building 12 smaller homes at street level with basements supported by piles under and outside each home;
- Alternative 6B is the operative proposed development plan that consists of building 4 larger homes at street level with no basements supported by piles under and outside each home;
- Alternative 7A consists of building 12 smaller homes at street level with basements supported by piles under and outside 9 homes and the removal and recompaction of the distributed landslide material under Revello Drive and the 3 homes on 17532, 17540 and 17547 Revello Drive;
- Alternative 7B consists of building 4 larger homes at street level with basements supported by piles under and outside 3 homes and the removal and recompaction of the distributed landslide material under Revello Drive and the 1 home across 17532, 17540 and 17547 Revello Drive.

Staff also asks the applicant to, at least, analyze the following alternatives:

1. A scenario where the caissons are proposed to be as close to the residences as possible so that the caissons stabilize the footprint of the homes rather than the whole site. The Applicant's analysis covers this scenario in Alternatives 4A, 4B, 5A and 5B and explains why these alternatives are not possible.
2. A scenario that partially daylights the basements and/or removes them entirely from the proposed homes/structures. The Applicant's analysis covers this scenario in Alternatives 5A and 5B and explains why these alternatives are not possible.
3. A scenario that supports the residences on pier foundations that would allow for continued slope movement above the existing failure plane. The Applicant's analysis covers this scenario in Alternatives 4A and 4B and explains why these alternatives are not possible.
4. A scenario that includes smaller home sizes and/or clustering of the development. The Applicant's analysis covers this scenario in Alternatives 4A, 5A, 6A and 7A and explains why Alternatives 4A and 5A are not possible.

Staff also asks Applicant to "describe in greater depth the slope retention methods (such as retaining walls) proposed to stabilize the Revello Drive extension". The Applicant submitted a geology and soil

report dated December 1, 2020 prepared by Stoney Miller to the Bureau of Engineering, Geotechnical Engineering Division for the proposed project (see Exhibit 12). This report consolidates and restates all the approved recommendations contained in the 10 reports previously submitted to the LADBS Grading Division but with a focus on the roadway improvements and extensions on Revello and Tramonto Drive.

The roadway improvements within the right-of-way fronting the home on Tramonto Drive include a descending ramp to access the proposed home that sits below the existing street. The north side of this ramp will be protected with a permanent new wall system directly in front of the existing bulkhead in certain areas to accommodate the lowering of the grade for this ramp. This wall varies in height from approximately 1 to 10 feet. The analysis and illustrations for this wall are contained in the report under Appendix H and are graphically shown on Plates 6r, 7r and 8r. The south side of this ramp will be protected by the downslope rows of piles (denoted as SPR-7, SPR-8, SPR-9 on Plate 6r) along with the retaining wall that is part of the proposed Tramonto home (denoted as RW-A1, RW-A2).

The roadway improvements within the right-of-way fronting the homes on Revello Drive include an ascending roadway extension to access the three proposed homes. This roadway extension would be stabilized by the three downslope rows of piles (denoted as SPR-1 to SPR-3), the retaining wall that is part of the proposed downslope home (denoted as RW-C), the six upslope rows of piles (denoted as SPR-4 to SPR-9) and the building structures that make up the two proposed upslope homes. In addition, the ascending roadway design requires a conventional retaining wall along the south side of the roadway, essentially between cross-sections JR and DR, that traverses upslope (to the north) to capture the western terminus of the roadway extension. The retaining wall at the terminus of the roadway would be supported by 3 or 4 piles placed within the right-of-way directly below the wall, which runs diagonally from northeast to southwest (see Exhibit 12, Plate 6r). Remedial grading is also recommended within the limits of the roadway improvements on Tramonto and Revello to include the removal and recompaction of approximately 5 feet of soil and, if required, geogrid reinforcement to prevent settling under the roadway.

#### 1b. Response to Staff Comments Regarding Hazards and Hazardous Material

Staff states "Coastal Act Section 30253(a) requires the minimization of risk to life, in addition to property, in areas of high fire threat. As such, Commission Staff ask the applicant to analyze the risk of wildfire threat to life and property at the site, including any necessary mitigation and adaptation strategies (fireproofing, weatherization, fuel modification, emergency irrigation systems, etc.). There should be discussion of how such mitigation and adaptation strategies minimize the threat of wildfire hazard at the site and in the surrounding area."

As stated in the published IS-MND, the project proposes roadway improvements that include a turnaround per LAFD regulations and design standards that will allow emergency and fire-responding vehicles to safely and promptly access and traverse that portion of the hillside and to be able to turn around at the terminus of Revello Drive, which currently is not possible. The improvements also propose the installation of a fire hydrant further west to better assist LAFD in the suppression and prevention of any fire hazard spreading in the area.

The life-safety aspect of the proposed project is subject to the purview of certain agencies such as LADBS, the Bureau of Engineering ("BOE") and the Los Angeles Fire Department ("LAFD"). Each home will also be compliant with the vested codes including, but not limited to, the Los Angeles Municipal Code ("LAMC"), the California Building Code ("CBC") and the California Fire Code ("CFC"). Some of the life-safety and mitigation and adaptation strategies include:

- installing automatic fire suppression/sprinkler systems in each home that is NFPA13 or better;



- using tempered glass for exterior doors and windows;
- using predominantly non-combustible materials such as concrete, steel and glass to construct the building exterior shell;
- constructing exterior wall and ceiling assemblies to have a one-hour fire-rating; and
- brush clearing and fuel modification will be performed around each home where appropriate while protecting/mitigating against environmental impacts.

## 2. Response to Staff Comments Regarding Biological Resources and Environmentally Sensitive Habitat Area (ESHA)

Based on Staff's comments pertaining to the on-site biological resources, Applicant and Applicant's consultants believe Staff is not aware of certain past events and the sequence in which these events occurred. Below is a chronology of relevant events that will hopefully help Staff better understand the extensive environmental and biological review process that has occurred to date for the proposed development.

From August 17, 2018 to February 20, 2019, Applicant purchased the 12 vacant lots included in the proposed project.

In January 2019, Applicant performed a series of borings on the nine Revello lots. In April 2019, Applicant performed several borings on the three Tramonto lots. As stated above, no grading work was performed.

In May 2019, brush was cleared from the entire site per LAMC and LAFD brush clearing requirements.

In August 2019, licensed arborist Lisa Smith with The Tree Resource visited the site to perform a tree survey. In September 2019, tree reports were submitted to the Urban Forestry Division for the four homes included in the proposed development. In October 2019, Urban Forestry approved all four tree reports, which are included in the published IS-MND under Exhibit C. The approved reports confirm there are not any protected trees on-site.

On November 12, 2019, biologists Tracy Park and Eileen Salas with Dudek visited the site to perform an initial biological survey to: (a) map the vegetation communities and land covers present within the study area, (b) perform an initial assessment of the quality of vegetation on-site, (c) perform an evaluation of potential jurisdictional wetlands or waters and (d) perform an evaluation of the potential for special-status species to occur in the study area.

On January 9, 2020, Applicant submitted Dudek's initial Biological Resource Letter Report (BRLR) dated November 27, 2019 which incorporated the findings from the biological survey performed on November 12, 2019.

On May 15, 2020, Planning asked Applicant to perform an Initial Study based on their internal review of the proposed project with the Environmental Staff Advisory Committee "ESAC".

In May 2020, brush was cleared from the entire site per LAMC and LAFD brush clearing requirements.

On August 31, 2020, Applicant submitted Dudek's Initial Study to Planning, which contained an updated BRLR dated July 9, 2020. The updated BRLR incorporated yet another biological survey performed by Tracy Park and Michael Cady on June 16, 2020 to refine the biological mapping and to do a focus survey for botanical resources.

On November 9, 2020, Planning asked Applicant to perform an Initial Study with Mitigative Negative Declarations ("IS-MND"). On November 19, 2020, Applicant submitted Dudek's initial IS-MND dated November 16, 2020 to Planning.

In late November 2020, Applicant cleared the vegetation on the three vacant lots located at 17538, 17544 and 17550 Tramonto Drive.

Over the next 7 months, Planning and other agencies performed an even more extensive environmental and biological review of the proposed development. During this time, Applicant updated the IS-MND five times and the BRLR three times based on comments received from Planning and other reviewing agencies including CDFW. To address certain comments from these reviewing agencies, Tracy Park visited the site for a third time on February 1, 2021 to perform a vegetation rapid assessment to further define the quality of the vegetation community on-site, which is a CDFW approved methodology. However, all reports and updates included the vegetation that existed prior to the clearing of the Tramonto lots in late November 2020 and provide analysis regarding the impacts to said vegetation.

In May 2021, brush was cleared from the entire site per LAMC and LAFD brush clearing requirements.

On May 25, 2021, CDFW submitted a draft of their initial comment letter that was later revised and resubmitted on September 16, 2021 (see Exhibit 13). On September 28, 2021, Dudek provided a technical response (see Exhibit 14) that incorporated Tracy Park's fourth site survey performed on September 27, 2021 to confirm monarch butterflies and bats were not roosting on-site.

On March 10, 2022, approximately 7 months after the IS-MND was published in August 2021, Planning informed Applicant that Staff would like additional analysis to be performed to investigate the potential for the project site to include an environmentally sensitive habitat area (ESHA). On March 25, 2021, Dudek provided a memorandum in response to Staff's request (see Exhibit 15).

Staff states "[a]fter the December 9, 2021 site visit and visible evidence of unpermitted grading and plant removal, Commission staff called into question the assertion that the site has been degraded over the long-term and/or without significant habitat values."

Staff's comments insinuate that the habitat on-site was recently degraded by unauthorized grading operations, which is not true. As discussed above, Applicant has never performed any grading work on-site. Staff has also not provided any evidence to support their allegation.

Staff states "[i]n previous discussions, Commission staff expressed to the applicant and City staff that even under circumstances where habitat may be degraded, it may still be considered ESHA. Furthermore, as evidenced from historic satellite imagery, prolific lemonade berry stands covered the site as recently as January 2020. Thus, the Commission's staff ecologist has determined the potential for ESHA to exist on the site."

First, Staff does not specify in their letter or the referenced ESHA memorandum under what circumstances degraded habitats could still be considered ESHA. Second, it appears that Staff has determined the potential for ESHA to exist on-site based solely on their belief from satellite imagery that there was an abundance of lemonade berry stands covering the site as of January 2020. However, Staff has not provided any historic satellite imagery to support this statement or their methodology for how their ecologist determined this vegetation to be a lemonade berry scrub vs. a quailbush scrub or ornamental vegetation. This determination cannot be done by reviewing satellite imagery but rather via site surveying. Fourth, even with accurate mapping, the quality of this vegetation cannot be determined from satellite imagery. Fifth, the Coastal Commission has not

defined the boundaries for ESHA in this area such is the case in the City of Malibu. In contrast to Malibu properties, the project site is immediately surrounded by infill properties to the north, west and east and the ocean to the south. It is not a corridor for wildlife.

Finally, Dudek concluded that: (a) the distributed lemonade berry scrub does not meet the criteria to be designed as an ESHA, as defined in the memorandum referenced by Staff, and (b) an ESHA does not exist within the limits of the project site. It is important to note that Dudek's findings are supported by multiple site visits and extensive studies and analyses performed over the past 30 months that also take into consideration input and comments from multiple reviewing agencies such as ESAC and CDFW.

Staff states "[a] more extensive analysis of the potential for ESHA will need to be conducted as part of the Coastal Commission CDP process. Nevertheless, at this preliminary stage, Commission staff call into question whether the aforementioned disturbance factors would necessarily qualify the site as not ESHA."

During Coastal's CDP process, Applicant will meet and confer with Staff in an effort to better understand what additional information and analysis is needed to show that an ESHA does not occur within the limits of the project site. However, for reasons explained above, Applicant believes the IS-MND and the supplemental reports/responses include a preponderance of evidence regarding the biological resources on-site that would aid in such a determination that an ESHA does not exist on-site.

Staff states "[a]s the Dudek memo correctly notes, lemonade berry scrub alliance has a rank of S3 rarity by CDFW, and quailbush scrub alliance has a rank of S4 rarity. As such, prior to the Commission's CDP application process, Commission staff urge the applicant to work with CDFW and other relevant resource agencies to establish criteria for sensitive habitat identification and management at the site."

As noted in the chronology above, over the past 30 months, Applicant has worked closely with CDFW and other relevant resource agencies via the lead agency Planning. Comments provided by these agencies have been further studied, analyzed and incorporated in the published IS-MND accordingly. Moreover, Applicant has proposed mitigation measures, which have been guided by the comments from these relevant agencies.

Staff states "[i]n addition, Commission staff would appreciate a reconstruction of the most probable ecological landscape at the site prior to recent human disturbance and vegetation clearing. Detailed discussion of the sensitive species inferred to be onsite should be included. Since there may not be enough evidence to definitively conclude the historic prevalence of specific ecological niches, geobiological gradients, and ecotones onsite, then specific mitigation, restoration, and/or habitat creation frameworks/metrics should also be developed in response to past, present, and future habitat degradation."

As noted in the chronology above, prior to the vegetation being cleared on the three Tramonto lots in late November 2020, Dudek's biologist visited the site twice to carefully map the vegetation communities and a BRLR was prepared. Thus, the actual (not most probable) ecological landscape was established. The BRLR discusses, in detail, the sensitive species that actually occur on-site so speculation is not necessary. Therefore, there is enough evidence to definitively conclude the historic prevalence of specific ecological niches, geobiological gradients, and ecotones on-site. In addition, the IS-MND provides mitigation measures based on the well documented biological resources occurring on-site prior to clearing the vegetation on these Tramonto lots.

Staff states "[i]f fuel modification is required for the project, the applicant should additionally outline the balance between reducing fire hazards and enhancing biological diversity and sensitive species at the site.

As discussed above, fuel modification measures are required per LAMC. However, as part of the IS-MND, the Applicant is proposing to mitigate the removal of the sensitive species on-site by funding an off-site mitigation bank that will replace the disturbed special status vegetation communities occurring on-site on a 2:1 basis. Additionally, the Applicant will propose native vegetation where feasible with low fire combustibility ratings to ensure that native vegetation exists on-site while minimizing fire hazards. If allowed by LAFD, the Applicant will use best efforts to replace/replant the lemonade berry scrub on-site in the areas denoted in the attached preliminary landscape plans (see Exhibit 16). The cumulative on-site area is approximately 5,700 square feet, which would be in addition to the off-site mitigation measures referenced above.

### 3a. Response to Staff Comments Regarding Utilities/Service Systems

Staff states "[t]he subject lots have never been developed with residences, and the roads that were truncated by the Tramonto Slide finally closed by 1959."

This is not correct. Three single-family homes were once erected on 17538, 17544 and 17550 Tramonto Drive. All three homes were destroyed by the landslide in the late 1950s. Even today, there are still remnants of the building foundations that once existed higher up on the hillside closer to Tramonto Drive.

Staff states "[t]he MND goes into some depth regarding the proposed utility systems proposed for the site... While the report states that transmission and distribution conduits, systems, storage facilities, metering, and billing will be made available for a variety of necessary utility services, it is not clear how those would be established in the first place. Additional discussion of how the applicant or City intends to facilitate the establishment of utility and service systems at the site, and how such systems would be consequently integrated into the proposed residences is not provided."

The three Tramonto properties are infill lots. Gas, power, water, sewer, data and telecommunication lines have already been established as they currently run under Tramonto Drive directly in front of the three Tramonto lots. The attached utility map, which was provided by the City of Los Angeles, shows these utility lines being approximately 25 feet from their point of connection to the Tramonto home (see Exhibit 17).

The nine Revello properties are also infill lots. Gas, power, water, sewer, data and telecommunication lines have already been established as they currently run under Revello Drive directly in front of 17526 Revello Drive. The attached utility map, which was also provided by the City of Los Angeles, shows these utility lines being no more than approximately 60 feet from their point of connection to the three Revello homes (see Exhibit 18).

The engineering for connecting to the nearby existing utility transmission and distribution facilities for the four proposed homes will be designed and coordinated by and among the Applicant's consultants, the BOE and each respective utility company.

### 3a. Response to Staff Comments Regarding Sustainability

Staff states "[t]here should be additional discussion of the Title 24 (California Green Building Code) and CPUC requirements or measures taken to make the development more sustainable; the applicant should detail any proposal for LEED certification, installation of solar panels, greywater

treatment and filtration, use of high-efficiency appliances and fixtures, low-water irrigation, and other measures to decrease energy consumption as required by Section 30253(d) of the Coastal Act. Such analysis would help Commission Staff determine whether the project complies with Coastal Act Sections 30250 and 30253(c) and (d)."

A full, comprehensive Low Impact Development (LID) site analysis and civil engineering design shall be submitted and approved by the City of Los Angeles, Bureau of Sanitation prior to construction. The LID package includes Best Management Practices (BMP) such as bioswales and biofiltration areas to retain and filter stormwater runoff from the site, permeable surfaces, and rainwater collection techniques. The project shall also comply with the requirements of the LADBS "Mandatory Requirements Checklist" and 2017 Los Angeles Green Building Code. High water efficiency plumbing fixtures will be proposed and installed in accordance with new California Plumbing Code Standards. High efficiency lighting fixtures (i.e. LED) will be proposed and installed in accordance with the new California Electrical Code Standards. Post-construction landscaping shall use native, drought tolerant plant and tree species where possible. Post-construction landscape planting shall restore, as much as possible, areas disrupted. The project shall also comply with the requirements of the LADBS "Mandatory Requirements Checklist" and 2017 Los Angeles Green Building Code. These regulations ensure projects comply with the latest energy efficient standards outlined in the Green Building Code. HERS QII inspections will also be performed during construction to ensure optimal installation methods to yield the maximum efficiency from the building materials used to construct these homes.

### 3b. Response to Staff Comments Regarding Scenic and Visual Resources

Staff states "[i]n order to ensure that prominent structural elements...of the proposed residences will not be visible along PCH and the adjacent beach, nor from any public roadways, or parklands, the applicant should prepare a visual analysis to simulate the potential impacts. Visual analysis should be conducted from a variety of angles, public vantage points, and topographical reliefs."

Applicant sent Planning a view study in April 2020 to simulate the potential visual impacts from the proposed project (see Exhibit 19).

Staff also states "[p]ublic views of the coast are prioritized, and therefore, visual obstruction from public roadways is of biggest concern."

The Tramonto home is developed below the elevation of the existing roadway and will therefore not impact any existing views of the Coast as currently proposed. The two upslope Revello homes, which are directly below the proposed Tramonto home, will also be well below the elevation of Tramonto Drive and therefore will not impact any views of the coast. Additionally, the proposed downslope home on Revello Drive will be sited such that any view from the newly improved public road would only contain a one-story facade. Due to the grade, the other levels of this home would be down the slope and below the elevation of the public road. Therefore, view obstructions of coastline would be minimized in all instances.

Staff states "the applicant should also study the potential for caisson or pile exposure over the life of the development via erosion-rate modeling."

Applicant initially addressed the potential for erosion to occur on page 5 of Stoney Miller's Geology and Soil Report dated October 24, 2019. Stoney Miller provides a more detailed response in their attached report dated April 25, 2022 (see Exhibit 20).

Staff states "[i]f the caissons are likely to be exposed, then the applicant should analyze mitigation measures that visually and aesthetically treat the piles to match the surrounding terrain, or otherwise install a skirt to cover the exposed piles. Vegetation and landscaping proposals should also be included as part of the discussion of consistency of the project with Section 30251 of the Coastal Act."

The project is well in conformance with the provisions of Section 30251 of the Coastal Act. Views from the coast and PCH will not be affected as the proposed project will be sited in an area surrounded by single-family home development. Furthermore, Staff can look to the findings for 5-18-0393 & A-5-PPL-18-0057 (17642 Tramonto) and derive similar conclusions for the subject case file, which consists of a 8,823 square-foot, 50.6 foot tall single-family home. The case file's approved staff report is attached (see Exhibit 21). An excerpt from this staff report reads as follows (see highlighted text on pages 12 and 13):

"The subject lots are significantly steeper than the surrounding lots within the Castellammare area. Due to the steep topography of the lots, the site is highly visible from PCH and the beach. Because the site is designated a scenic area and is highly visible from the beach and PCH, any new development on the lots should be compatible with the neighboring structures in the area with regard to mass and scale. In order to analyze a project's consistency with community character, Table 1 below shows the envelope height or existing structures as assessed by a neighbor, as well as the City's assessment, including residential floor area (RFA) of the row of development seaward of Tramonto Drive.

As revised, the applicant proposes to construct a new residence with a height envelope of 50.6 ft. The residence is designed to be built into the hillside by excavating approximately 4,000 c. y. of earth. The structure would be visible from PCH and the beach, appearing to be 47 ft. tall. The western and eastern elevations would not be visible because the proposed structure would be located in between two homes. The northern elevation along Tramonto Drive would rise to a height of approximately 10 ft. above the street, which is consistent with the neighboring homes.

According to Table 1, the floor area of homes along the seaward side of Tramonto Drive fall between 1,525 sq. ft. and 6,046 sq. ft. and envelope heights range from approximately 31 ft. to 84 ft. The proposed project would be the largest home along the seaward side of this section of Tramonto Drive; however, the main residence would be located landward of the existing stringline and would not extend further down the slope than neighboring homes. The downslope limit of the neighboring structures located adjacent to the proposed structure at 17646 and 17630 Tramonto Drive terminates at approximately 279 ft. above sea level, similar to the proposed structure. Additionally, these adjacent structures are similar in height to neighboring homes from the south elevation (Exhibit 9). In order to ensure approved development is consistent with the applicant's revised plans, Special Condition 1 requires the applicant to submit final revised plans that show the site plan, elevations, cross sections, and structural plans of the proposed development. Accessory development such as a swimming pool and decks do not always require a CDP according to Section 13250 of the Commission's regulations. However, in order to protect the visual qualities of this area Special Condition 2 requires that future improvements consisting of any accessory development seaward of the primary residence must obtain a separate CDP or amendment to this CDP. [Emphasis added]

The applicant also proposes a 10-ft. tall, 178-ft. long pile-supported retaining wall that spans the entire southern property boundary line that aims to stabilize the site and existing landslide debris from further slippage and erosion that could impact downslope areas, including a neighboring home and a planned public walkway area. The wall would be landward of an approved development (CDP 5-15-2074) and would not be significantly visible from public viewpoints. However, in order to reduce the visibility of a vertical wall, the applicant proposes to landscape the wall with Pink "California" Honeysuckle (*Lonicera hispidula*), a shrubby vine plant that is native to California and Pacific Coast states, as seen in the landscape plan dated January 18, 2017 and submitted by the applicant (Exhibit 3). The plant is designated as low water and would not require additional irrigation once established<sup>2</sup>. Thus, Special Condition 3 requires that the applicant comply with the landscape plan provided to minimize impacts of the wall from public views. Special Condition 4 assures that the applicant maintain the façade of the retaining wall with native, drought-tolerant landscaping as described above. The applicant's geotechnical engineer determined in their report that exposure of caissons, grade-beams, and/or piles from slope retreat are unlikely to occur over the life of the structure because the site exhibits a relatively shallow bedrock layer that is not significantly subject to erosion in the future. Nevertheless, to minimize landform alterations and visual impacts of the project, Special Condition 5 requires that the applicant cover or color any caissons that are exposed in the future due to episodic erosion from seismic activity and such. In addition, the applicant has modified the project description to remove accessory development located seaward of the proposed primary residence, which reduced the number of caissons required to support the proposed development by 15. Therefore, the project minimizes landform alterations and visual impacts of the development from public viewpoints, including impacts of the proposed foundation support system and retaining wall. [Emphasis added]

As such, the proposed development, that is located within an existing developed area, has been redesigned and sited to be contiguous with the existing stringline of development. As conditioned, the proposed development will be compatible with the character and scale of the surrounding area and minimizes landform alterations and visual impacts of the proposed development. Therefore, the Commission finds that the development, as conditioned, conforms with Sections 30250 and 30251 of the Coastal Act."

Furthermore, all prominent structural elements (such as caissons and piles) will be below grade and therefore not visible from any public vantage point. However, if such caissons/piles are exposed during the life-cycle of the building structure(s), the Applicant is willing to adhere to the same conditions in the approved staff report of case file 5-18-0255 for 14948 Corona Del Mar (see Exhibit 22). An excerpt from this staff report reads as follows (see highlighted text on pages 6 and 7):

"Structural Appearance (Foundation Exposure). PRIOR TO ISSUANCE OF THIS PERMIT, the applicants shall submit a plan for the review and approval of the Executive Director to address the potential visual impacts of the caissons in the event that the caissons are exposed and visible from Pacific Coast Highway as a result of earth movement or other circumstances. The applicants shall agree in writing to carry out the approved plan, which shall include:

- A. Coloring the exposed concrete caissons so that they will match the surrounding soils. The caissons and retaining walls should be colored in such a way that the result would be a natural, mottled appearance. If any caissons



are exposed, the applicants shall immediately dye or conceal such foundations.

B. Installation of a low “breakaway” skirt wall to cover exposed earth and/or pilings.

The permittees shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is legally required for any proposed minor deviations.”

### 3c. Response to Staff Comments Regarding Transportation Access, Circulation and Parking

Staff states “[i]t is unclear whether parking, as currently proposed, would adequately serve the new development and resultant parking demand. Information regarding the proposed number of off-street parking spaces for each residence, as well as on-street parking for the Revello Drive extension, was missing in the MND and Appendix H (Traffic Management Plan). Thus, to comply with Section 30252(4) of the Coastal Act, the applicant should provide the number of parking spaces for each of the four residences and how many on-street parking spaces will be available to the public with the road extension, if any.”

The proposed and required off-street parking for each home is as follows:

- (1) 17538, 17544 and 17550 Tramonto Drive (aka SHP House 1)  
Proposed Off-Street Parking: 5 spaces  
Required Off-Street Parking: 5 spaces
- (2) 17532, 17540 and 17548 Revello Drive (aka SHP House 2)  
Proposed Off-Street Parking: 4 spaces  
Required Off-Street Parking: 4 spaces
- (3) 17523 and 17529 Revello Drive (aka JDR House 1)  
Proposed Off-Street Parking: 3 spaces  
Required Off-Street Parking: 3 spaces
- (4) 17533, 17537, 17541 and 17547 Revello Drive (aka JDR House 2)  
Proposed Off-Street Parking: 5 spaces  
Required Off-Street Parking: 5 spaces

Tramonto Drive has an improved roadway width of approximately 35 feet to the east and west of the proposed Tramonto home. On-street parking is permitted on the south side of the street adjacent to the three Tramonto lots.

Revello Drive has (or will have) an improved roadway width of approximately 20 feet fronting the proposed Revello homes. On-street parking is permitted on one side of the street unless street signs prohibit otherwise, such as on red-flag days or along red curbs.

### 3d. Response to Staff Comments Regarding Tribal Cultural Resources

Staff states "The CHRIS records search yielded three "prehistoric" resources within at most 0.46 miles of the project site, with one deposit in particular being 0.18 miles to the northeast of the site....This finding suggests that there is a high likelihood that tribal cultural resources could be found on site. The applicant has not conducted their own investigation and relies on 31 previous cultural resource studies in the vicinity instead. No previous investigation is known to have been conducted on the project site itself. It is important to further specify in the case documents the excavation methods proposed, given that substantial ground disturbance is anticipated for this potentially sensitive site."

Planning did not require or ask Applicant to perform an investigation, nor did Applicant's archeological consultant (Dudek) believe an investigation was warranted for the reasons explained below. A description of the three prehistoric records identified in the Cultural Resources Report are as follows:

- (1) P-19-000134 is a prehistoric site originally formally recorded in 1950 by Eberhart who described the site as a village site containing projectile points, chipped stone tools, midden, and groundstone. Eberhart noted that in the fall of 1953, the site was removed during construction and no part of the site remains. P-19-000134 was also formally recorded by Nelson who described the site as a "refuse heap" possibly extending to a depth of two feet in some places. Nelson also stated that no artifacts were found.
- (2) P-19-000219 is a prehistoric site originally formally recorded in 1950 by Eberhart who described the site as a village site containing projectile points, chipped stone tools, midden, and groundstone. Eberhart noted that in the fall of 1953, the site was removed during construction and no part of the site remains. Applicant's consultants believe P-19-000134 and P-19-000219 are the same site given the Eberhart site records are identical and previously designated as LA-60.
- (3) P-19-100497 is a prehistoric site originally formally recorded in 2004 by Mealey who described the site as redeposited shell midden that was brought in as fill from various locations. The site was redeposited sometime during the late 1960's and early 1970's and extends to a depth of 25 to 35 feet in some places. The resources did not originate from the site but were transported there via grading and fill operations.

Thus, Staff's comment that "there is a high likelihood that tribal cultural resources could be found on site" is unsubstantiated and misleading as Applicant's consultant believes there is only one prehistoric site for which no artifacts were found. It is also important to note that whatever resources were found at this one prehistoric site were discovered only two feet from the surface which is highly relevant considering the project site is in an active landslide.

Staff states "Page 121 of the MND states: "the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period. No response was received." It is not clear if the City followed the protocol for tribal consultation laid out in the Commission's policy. It is also not clear what procedures were taken to determine that no affected tribe was interested in consultation. If the City has not done so already, Commission Staff strongly recommends the City reach out to the California Native American Heritage Commission (NAHC) and/or the State Historic Preservation Office (SHPO) to obtain a Sacred Lands File (SLF) for the project site, use multiple communication methods to try to get in touch with Native American groups on the NAHC contact list, and meaningfully engage with such group."

Assembly Bill (AB) 52 requires the lead agency (Planning) to make a good faith effort to promote the involvement of California Native American Tribes in the decision-making process when it comes to identifying and developing mitigation for impacts to resources of importance to their culture.

Applicant has been notified by Planning that the requisite letter was sent USPS certified mail to the tribes on December 1, 2020 and Planning did not receive any request for consultation within the 30-day comment period as stated in the IS-MND. Based on Applicant's discussions with Planning, it is Applicant's understanding that Planning's outreach to the tribes was in full compliance with AB 52. In addition, considering the historic and existing site conditions, it seems unnecessary to perform any further outreach. However, Applicant acknowledges that Staff may also want to try to get in touch with the tribes given the Coastal Commission's newly adopted tribal consultation policy.

Staff also states "[a]s a result of meaningful engagement with such groups and given the likelihood that tribal cultural resources exist onsite, the City may need to recommend or require avoidance of impacts to tribal cultural resources, which can include but are not limited to archeological resources, biological resources, and scenic resources...."

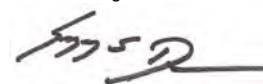
As stated in the IS-MND, the development site was not identified as having any archeological or paleontological resources of value. Furthermore, it is extremely unlikely that any resources would be discovered considering the site is in an active landslide. In approximately 1936 and 1959 the lower and upper portions of the development site failed, respectively. The dotted (not dashed) line on Plate 2r in the geology and soil report referenced in Exhibit 12 shows the hillside topography in 1958 just before the landslide occurred.

As illustrated in Plate 2r, these two geologic events resulted in the top 20 to 30 feet of soil suddenly moving down the slope towards the PCH. The shear force and pressure from the soil movement would have destroyed any tribal or archeological resources that may have once existed on-site. Moreover, these resources would have been significantly displaced to outside the limits of the proposed development. Consequently, it is highly improbable that any proposed excavations will discover any historic or tribal cultural resources.

However, in the unlikely event this occurs, the project has a mitigation measure in the MND that states: "[i]f archaeological and/or tribal cultural resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, and/or a tribal cultural resources specialist can evaluate the significance of the find and determine whether additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA) (14 California Code of Regulations Section 15064.5(f); California Public Resources Code (PRC) Section 21082), the archaeologist and/or tribal cultural resources specialist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan and data recovery may be warranted."

I thank you for your time and careful review.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Demos", with a horizontal line extending to the right.

Gregory S. Demos  
President, Demos Development

Download Link for Exhibits:

<https://app.box.com/s/ayx48r0ns5pnjhbzxbfaassqtma1f4xj>

Exhibit 15  
Dudek Memo  
Regarding ESHA

## MEMORANDUM

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**To:** Greg Demos, Springhouse Hamilton Park, LLC  
**From:** Michael Cady, Ryan Henry, Dudek  
**Subject:** Investigation of Potential ESHA at the Revello-Tramonto Project  
**Date:** March 25, 2022  
**cc:** Tony Russo, Crest Real Estate  
**Attachment(s):** A. Figures

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This technical memorandum summarizes previous relevant biological resource investigations to inform potential Environmentally Sensitive Habitat Area (ESHA) designation at the Revello-Tramonto Project (Project). The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County, California (Attachment A, Figure 1). Previous biological resource surveys consisted of vegetation community mapping, seasonally appropriate floristic surveys for special status plants, and assessment of Sensitive Natural Communities and 1-parameter wetlands, which are thoroughly discussed in a previous prepared Biological Resources Letter Report.<sup>1</sup>

This investigation of biotic conditions and historic disturbance onsite was conducted to inform determination of potential ESHA. A description of native/naturalized vegetation communities, landforms, soil substrates, and previous anthropogenic disturbance are discussed in this memorandum to supplement previous botanical studies and help determine whether these areas qualify or do not qualify as ESHA.

## 1 Project Summary

The Project involves the construction of four new single-family residences. A 9,051 square-foot residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive. A 4,160 square-foot residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive. A 2,619 square-foot residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive. Lastly, a 6,078 square-foot residence (with an additional 7,949 square-foot basement) would be located at 17531, 17533, 17537, 17541 Revello Drive.

There will be two primary staging and parking areas during construction. The staging/parking area for SHP House 1 will be on-site within parcels located at 17538, 17544, and 17550 Tramonto Drive behind the building footprint. This staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The staging/parking area for the three homes on Revello (i.e. SHP House 2 and JDR Houses 1 and 2) will be located west of the current terminus of Revello Drive between JDR House 2 and SHP House 2. This staging/parking area will be a relatively flat

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<sup>1</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

pad that is approximately 36 feet wide by 180 feet long. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

## 2 Regulatory Setting

### 2.1 Environmentally Sensitive Habitat Areas

ESHAs are defined by the California Coastal Commission (CCC) as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. (Pub. Resources Code, § 30107.5). This broad definition includes habitat for special-status species and other areas that provide important ecosystem functions. The designation of an ESHA generally includes vegetation alliances listed as Sensitive Natural Communities with an S1 to-S3 ranking. The Coastal Commission and local counties or municipalities associated with the Local Coastal Program (LCP) are the jurisdictional agencies that exert authority in identifying and protecting ESHA in the course of project activities.

The CCC issued guidance in 2013 to assist with determining ESHAs.<sup>2</sup> Two basic conditions must be met for an ESHA designation:

- 1) There are rare species or habitat in the subject area;
- 2) There are especially valuable species or habitat in the area, which is determined based on:
  - a. whether any species or habitat that is present has a special nature, OR
  - b. whether any species or habitat that is present has a special role in the ecosystem

When the CCC has found that either of these two conditions is met, it has assessed whether the habitat or species meeting these conditions is easily disturbed or degraded by human activities and developments. If they are, the CCC has found the area to be ESHA. It should be noted that even disturbed or degraded habitats may constitute an ESHA depending on the level of disturbance. The CCC guidance from 2013 also advises to “consider using the following resources in order to assess whether an area should be considered an ESHA:

- 1) The list of rare, threatened or endangered species prepared under the California or Federal Endangered Species Act
- 2) The list of “fully protected species” or “species of special concern” by the California Department of Fish and Wildlife
- 3) The list of “1b” species prepared by the California Native Plant Society.
- 4) The CDFW List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database

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<sup>2</sup> California Coastal Commission 2013. LCP Update Guide, Section 4. Environmentally Sensitive Habitats and Other Natural Resources. San Francisco, CA. July 31, 2013.

This technical memorandum evaluates habitat based on the above listed considerations from the CCC 2013 guidance, including (1) the presence of rare species and habitat, (2) habitat value, and (3) whether the resources are easily disturbed or degraded.

### 3 Methods

Dudek conducted vegetation community and land cover mapping in November 2019 throughout a 32.29-acre study area (i.e., 1.33-acre project site and 30.96-acre study area outside of the project site) using *A Manual of California Vegetation, Second Edition* (MCV2) and the online edition (MCV Online) with modifications to accommodate the lack of conformity.<sup>3,4</sup> Vegetation mapping was conducted in accordance with CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* and CNPS *Guideline for Mapping Rare Vegetation*.<sup>5,6</sup> As such, vegetation communities were classified following CDFW List of California Terrestrial Natural Communities, which is based off of MCV2 and the MCV online edition.<sup>7</sup> Vegetation communities and land covers were mapped in the field directly onto a 150-scale (1 inch = 150 feet) color digital aerial map of the property.

In February 2021, Dudek conducted a subsequent assessment of vegetation communities in the study area in order to demonstrate disturbed site conditions, high prevalence of non-native species, and to refine boundaries of earlier vegetation mapping efforts. The assessment was conducted following the most recent *CDFW-CNPS Protocol for the Combined Vegetation Rapid Assessment and Relevé Field Form* from 2019.<sup>8</sup> This method is a “semi-quantitative” method, relying on ocular (visual) estimates of plant cover rather than on counts of “hits” of a particular species along a transect line or other precise measurement techniques. The rapid assessment was based on an estimated representative area of the stand. Visual estimates were made from a base point established from within the stand. Notable collected data relevant to determining the vegetation community type and condition include soil textures; surface cover of abiotic and biotic substrates (i.e., surface water, litter, bedrock, boulder, stone, cobble, gravel, and fines); disturbance types and qualitative intensity evaluations; overall cover of vegetation by non-vascular cover, total vascular cover, and cover by vegetative layers (i.e., conifer tree/hardwood tree, regenerating tree, shrub, herbaceous); as well as a species list and each species’ coverage.

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<sup>3</sup> Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. *A Manual of California Vegetation*, Online Edition. California Native Plant Society, Sacramento, CA. <http://vegetation.cnps.org/>

<sup>4</sup> California Native Plant Society. 2021. *A Manual of California Vegetation*, Online Edition. California Native Plant Society, Sacramento, California. Accessed January 2021. <https://vegetation.cnps.org/>.

<sup>5</sup> California Department of Fish and Wildlife. 2018. “Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities.” March 20, 2018. Accessed July 2020. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.

<sup>6</sup> California Native Plant Society. 2011. *Guidelines for Mapping Rare Vegetation*. CNPS, January 2011. [https://www.cnps.org/wp-content/uploads/2018/03/guidelines-rare\\_veg\\_mapping.pdf](https://www.cnps.org/wp-content/uploads/2018/03/guidelines-rare_veg_mapping.pdf).

<sup>7</sup> California Department of Fish and Wildlife. 2020b. *Natural Communities List*. Accessed July 2020. <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.

<sup>8</sup> California Department of Fish and Wildlife and California Native Plant Society. 2019. “CDFW-CNPS Protocol for the Combined Vegetation Rapid Assessment and Relevé Field Form”. February 21, 2019. Accessed February 2021. <https://www.cnps.org/plant-science/field-protocols-guidelines>.



## 4 Results

Five vegetation communities and land cover types were identified within the study area during the biological resource evaluation: disturbed lemonade berry scrub, disturbed quailbush scrub, urban/developed land, ornamental vegetation, and disturbed habitat. Figure 2, Biological Resources, illustrates the distribution and Table 2 summarizes the extent of each vegetation community and land cover type. Descriptions of the naturalized vegetation types mapped in the study area are summarized below from the project's Biological Resources Letter Report.<sup>9</sup>

**Table 1. Vegetation Communities and Land Cover Types in the Study Area**

Vegetation Community/Land Cover	Acreage	
	Within the Project Site Only	Within the Study Area (Project Site plus 500-Foot Buffer)
<b>Native or Naturalized Vegetation Types</b>		
Disturbed Lemonade Berry Scrub	0.49	2.31
Disturbed Quailbush Scrub	0.00	0.32
<i>Subtotal</i>	0.49	2.63
<b>Non-Natural Land Covers</b>		
Urban/Developed	0.02	19.24
Ornamental	0.39	7.29
Disturbed Habitat	0.44	3.14
<i>Subtotal</i>	0.85	29.67
<b>TOTAL<sup>1</sup></b>	<b>1.33</b>	<b>32.29</b>

<sup>1</sup> Total may not sum due to rounding.

### 4.1 Description of Native/Naturalized Vegetation Types

#### 4.1.1 Disturbed Lemonade Berry Scrub

Remnant patches of this vegetation community are found in undeveloped areas of the study area, including the project site, and are mapped as disturbed lemonade berry scrub due to the high cover of non-native species (within the rapid assessment area, 31 percent absolute cover and 39 percent relative cover of vegetation), fragmentation from adjacent stands of ornamental plantings and disturbed areas, presence of a historic landslide that continues to move downhill, and anthropogenic disturbances (e.g., pedestrian trails, trash dumping, and regular mowing). Native species observed in the disturbed lemonade berry scrub within rapid assessment area include lemonade berry, ashy buckwheat, black sage, giant wildrye (*Elymus condensatus*), California brittle bush, California sagebrush, laurel sumac (*Malosma laurina*), coyote brush (*Baccharis pilularis*), deer weed (*Acmispon glaber* var. *glaber*), laurel sumac, and nodding needlegrass (*Stipa cernua*). However, non-native species observed in this vegetation community at approximately 39 percent relative cover include American century plant (*Agave americana*), jade

<sup>9</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

plant (*Crassula ovata*), castorbean (*Ricinus communis*), Barbary fig (*Opuntia ficus-indica*), hottentot fig (*Carpobrotus edulis*), leafy spurge (*Euphorbia virgata*), Uruguayan pampas grass (*Cortaderia selloana*), red brome (*Bromus rubens*), burclover (*Medicago polymorpha*), and tree tobacco (*Nicotiana glauca*).

Lemonade berry scrub within the project-site is minimal at approximately 0.49-acre; whereas it is found with more concentrated distribution and broader variation of associations of this alliance further north in the Santa Monica Mountains National Recreational Area compared with other areas of coastal southern California.<sup>10,11</sup>

Lemonade berry scrub alliance has a rank of G3S3<sup>12</sup>, which means it is vulnerable (i.e., at moderate risk due to a limited range, relatively few populations or occurrences, or recent and widespread declines or threats) globally and sub nationally. This vegetation community is considered sensitive by local, state, and/or federal agencies. The lemonade berry scrub mapped within the project site and study area would be considered low quality, as it is highly disturbed and isolated (surrounded by disturbed habitat and ornamental landscaping) with a high cover of non-native species.

#### 4.1.2 Disturbed Quailbush Scrub

A remnant patch of this vegetation community is located in the southern portion of the study area, along the northern side of the PCH. Species observed in the disturbed quailbush scrub within the study area include native California sagebrush, California brittle bush, and laurel sumac, and non-native castorbean, coyote brush, hottentot fig, purple pampas grass, and tree tobacco.

This vegetation community is mapped as disturbed quailbush scrub in the study area due to the high cover of non-native species and anthropogenic disturbances (e.g., pedestrian trails, mechanical perturbation) and high cover of non-native species. Quailbush scrub alliance has a rank of G4S4, which means it is apparently secure (i.e., uncommon but not rare, with some cause for long-term concern due to declines or other factors) globally and sub nationally. This vegetation community is not considered sensitive by local, state, and/or federal agencies.

### 4.2 Determination of Environmentally Sensitive Habitat Areas

The purpose of this investigation was to evaluate factors that inform designations of ESHA by the Coastal Commission, Coastal Act and LCP, including the presence of rare species and communities, habitat value, and potential for further degradation. The project site is zoned for single-family dwellings with the general plan use designated as low density residential.<sup>13</sup> The site is surrounded by single-family residences with small-sized lots primarily dominated by planted landscaping. Although some natural areas still occur along the steep hillsides, these areas include a high cover of non-native plant species, have been previously disturbed as a result of a historic landslide, and are patchy due to anthropogenic disturbance such as mechanical perturbation, high foot traffic, trash

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<sup>10</sup> AIS (Aerial Information Systems). 2007. USGS-NPS Vegetation Mapping Program, Santa Monica Mountains National Recreational Area, Photo Interpretation Report. May 23, 2007. Aerial Information Systems, Inc. Prepared for Santa Monica Mountains National Recreation Area. <https://nrm.dfg.ca.gov/documents/ContextDocs.aspx?cat=VegCAMP>.

<sup>11</sup> Stoms, D. M., P. A. Jantz, and F. W. Davis. 2012. Natural resource condition assessment: Santa Monica Mountains National Recreation Area. Natural Resource Report NPS/SAMO/NRR-2013/715. National Park Service, Fort Collins, Colorado. <https://irma.nps.gov/DataStore/DownloadFile/484097>.

<sup>12</sup> NatureServe Global (G) and State (S) rarity ranks per Faber-Langendoen et al. (2012). Natural communities with global or state ranks of 1–3 are considered sensitive natural communities by CDFW (2020b) and are to be addressed in the environmental review processes of CEQA

<sup>13</sup> City of Los Angeles. 2019. Zimas. Web Map Application. Accessed November 2019. <http://zimas.lacity.org/>.

dumping, and erosion. Additionally, soils within the project site that were mapped as Urban land-Xerorthents, landscaped complex, 0 to 5 percent slopes were confirmed during field investigations.<sup>14</sup> These soils are comprised of colluvium and residuum derived from sedimentary rock and other mixed sources, are well drained, and support ornamental plants and lawns.

Table 2 summarizes the ESHA criteria and evaluation factors used for this assessment.

**Table 2. Summary of ESHA Criteria as Applied to the Project Site**

ESHA Criteria	Evaluation Factors
Rare species or habitat in the subject area	No CNPS-listed rare plants are present on the project site. However, approximately 0.49 acres of disturbed lemonade berry scrub is present in the subject area. Native stands of lemonade berry scrub are considered a Sensitive Vegetation Community by the CDFW.
Valuable species or habitat in the area because of their special nature or role in an ecosystem	Resources onsite are considered lower value habitat because they have been fragmented, invaded, and anthropogenically disturbed over the last 30 plus years.
Easily disturbed or degraded by human activities and developments	The lemonade berry scrub on the project site has been highly altered by historic landslides, clearing, high foot traffic, trash dumping, erosion, and invasive species. Remaining individual native shrubs are fragmented. Habitat onsite does not consist of a relatively intact or pristine landscape that would be easily disturbed or degraded beyond its current condition.

No special-status plants were observed or are expected to occur within the project site. No special-status wildlife species were detected within the project site. The project site contains isolated, disturbed native vegetation, and is dominated by residential development and ornamental vegetation, which provides low-quality, limited suitable habitat to support special-status wildlife species. Thus, with the exception of the western mastiff bat (a CDFW species of special concern and locally recognized sensitive species) that has the potential to occasionally forage within the project site, special-status wildlife species have a low or no potential to occur on site. Project construction is proposed to occur primarily during daylight hours; thus, foraging bats are not anticipated to be impacted by the proposed project activities.

In conclusion, although lemonade berry scrub occurs onsite, the habitat has been highly altered and degraded by human disturbance and invasive species. Based on the current highly degraded status, the project site would not be suitably characterized as a relatively intact or pristine habitat that would be easily disturbed or degraded beyond its current condition. As a result, the 0.49 acre of disturbed lemonade berry scrub does not meet the criteria to be designated as an ESHA.

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<sup>14</sup> U.S. Department of Agriculture Natural Resources Conservation Service. 2006. Soil Survey of Santa Monica Mountains National Recreation Area, California. Accessed November 2019. [http://soils.usda.gov/survey/printed\\_surveys/](http://soils.usda.gov/survey/printed_surveys/).

# Attachment A

## Figures



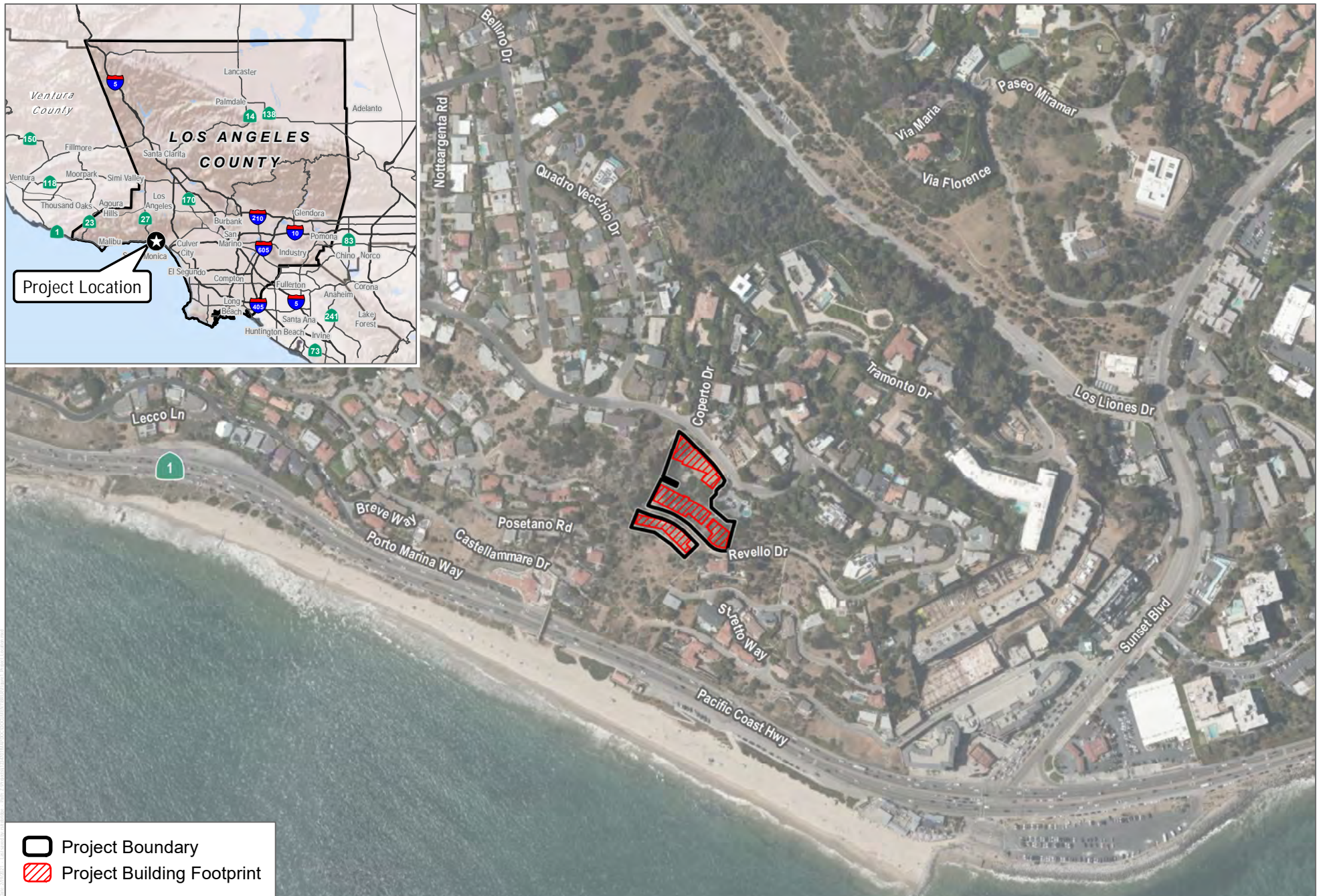


FIGURE 1  
Project Location

Revello Drive and Tramonto Drive Residential Project





FIGURE 2

## Biological Resources

Revello Drive and Tramonto Drive Residential Project



## MEMORANDUM

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**To:** Springhouse Hamilton Park, LLC | JDR Revello LLC  
**From:** Michael Cady | Senior Biologist  
**Subject:** Analysis of Proposed Locations for Lemonade Berry Plantings  
**Date:** May 31, 2022  
**cc:** Tony Russo | Crest Real Estate – Director, Discretionary Entitlements Division  
**Attachment:** A. Preliminary Landscaping Plan; B. Vegetation Communities and Proposed Planting Corridors

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This memorandum provides the ecological content for the proposed planting of lemonade berry (*Rhus integrifolia*) at the Revello-Tramonto Project (Project). The Project is in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County, California. Previous biological resource surveys conducted by Dudek consisted of vegetation community mapping, seasonally appropriate floristic surveys for special status plants, and assessment of Sensitive Natural Communities and 1-parameter wetlands, which are thoroughly discussed in a previous prepared Biological Resources Letter Report.<sup>1</sup> Additionally, Dudek prepared an Investigation of Potential Environmentally Sensitive Habitat Area (ESHA) for the Project.<sup>2</sup>

### Project Summary

The Project involves the construction of four new single-family residences. A 9,051 square-foot residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive. A 4,160 square-foot residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive. A 2,619 square-foot residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive. Lastly, a 6,078 square-foot residence (with an additional 7,949 square-foot basement) would be located at 17531, 17533, 17537, 17541 Revello Drive.

### Preliminary Landscaping Plan

The Project's Preliminary Landscaping Plan (Attachment A) indicates where lemonade berry is proposed to be planted for each of the four new single-family residences. For the 17550 Tramonto Drive, the lemonade berry is proposed to be planted along the eastern portion in what is currently mapped as disturbed habitat and ornamental vegetation (Attachment B). For 17533 W Revello Drive, the lemonade berry is proposed to be planted along the northern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B). For 17523 W Revello Drive, the lemonade berry is proposed to be planted along the northern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B).

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<sup>1</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

<sup>2</sup> Dudek. 2022. Investigation of Potential ESHA at the Revello-Tramonto Project. March 25, 2022.



For 17532 W Revello Drive, the lemonade berry is proposed to be planted along the southern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B).

It is important to note the approved geology and soil report for the Project recommends the entire development site be as impermeable as much as possible to mitigate the infiltration of water into the area where a landslide previously occurred. As such, the proposed planting areas for the lemonade berry scrub are limited to sloped terrain, where impermeable surfaces are not feasible. Specifically, the report states:

"The site engineers and designers should be aware that the site is geotechnically unsuitable for the local discharge of onsite storm water due to the sloping conditions and the high likelihood that discharged water would adversely saturate the soils and landslide materials. It is recommended that the area be impermeable as much as possible such that rain water captured on site will be directed/drain into the storm water system and does not infiltrate into the ground."

## Analysis

Remnant patches of this vegetation community are found in undeveloped areas of the study area, including the project site, and are mapped as disturbed lemonade berry scrub due to the high cover of non-native species (within the rapid assessment area, 31 percent absolute cover and 39 percent relative cover of vegetation), fragmentation from adjacent stands of ornamental plantings and disturbed areas, presence of a historic landslide that continues to move downhill, and anthropogenic disturbances (e.g., pedestrian trails, trash dumping, and regular mowing). While the existing lemonade berry onsite and in the adjacent parcels is not pristine, planting lemonade berry in the northern portions of 17533 W Revello Drive and 17523 W Revello Drive would provide a continuous connection to lemonade berry scrub to the east and west of these locations. It would be expected that native and non-native plant species in the adjacent area would naturally spread into the landscape portions of the site. As the planted and volunteer shrubs mature, it is expected that common urban-adapted, terrestrial wildlife (such as Virginia opossum, Audubon's cottontail, California ground squirrel, deer mouse, and raccoon) could use the connected habitat for local movement and it would provide refugia from predators (e.g., raptors, owls, and coyote).

## Conclusion

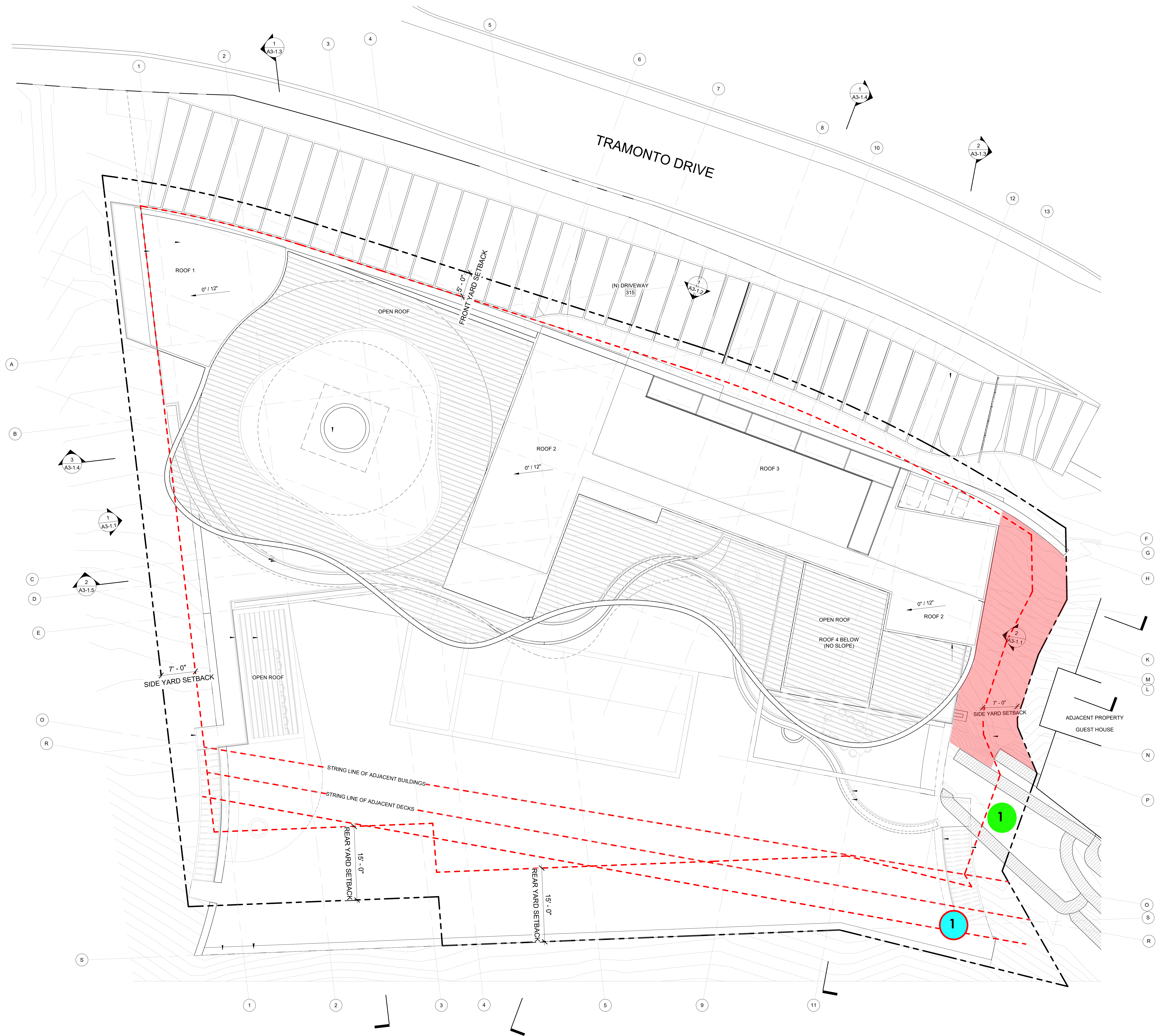
The proposed replanting lemonade berry scrub areas are in favorable locations, especially on 17523 and 17533 Revello Drive, based on the following reasons:

- (1) occur within existing lemonade berry scrub areas;
- (2) create connectivity between existing lemonade berry scrub areas to the east and west of the project; and
- (3) may help preserve and create lemonade berry scrub in this area by creating a corridor that could continue to be extended and maintained with consistent regulatory oversight of future development in the adjacent parcels, as depicted in Attachment B.

# **Attachment A**

## Preliminary Landscaping Plan





## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

## SUMMARY OF REPLACEMENT TREES

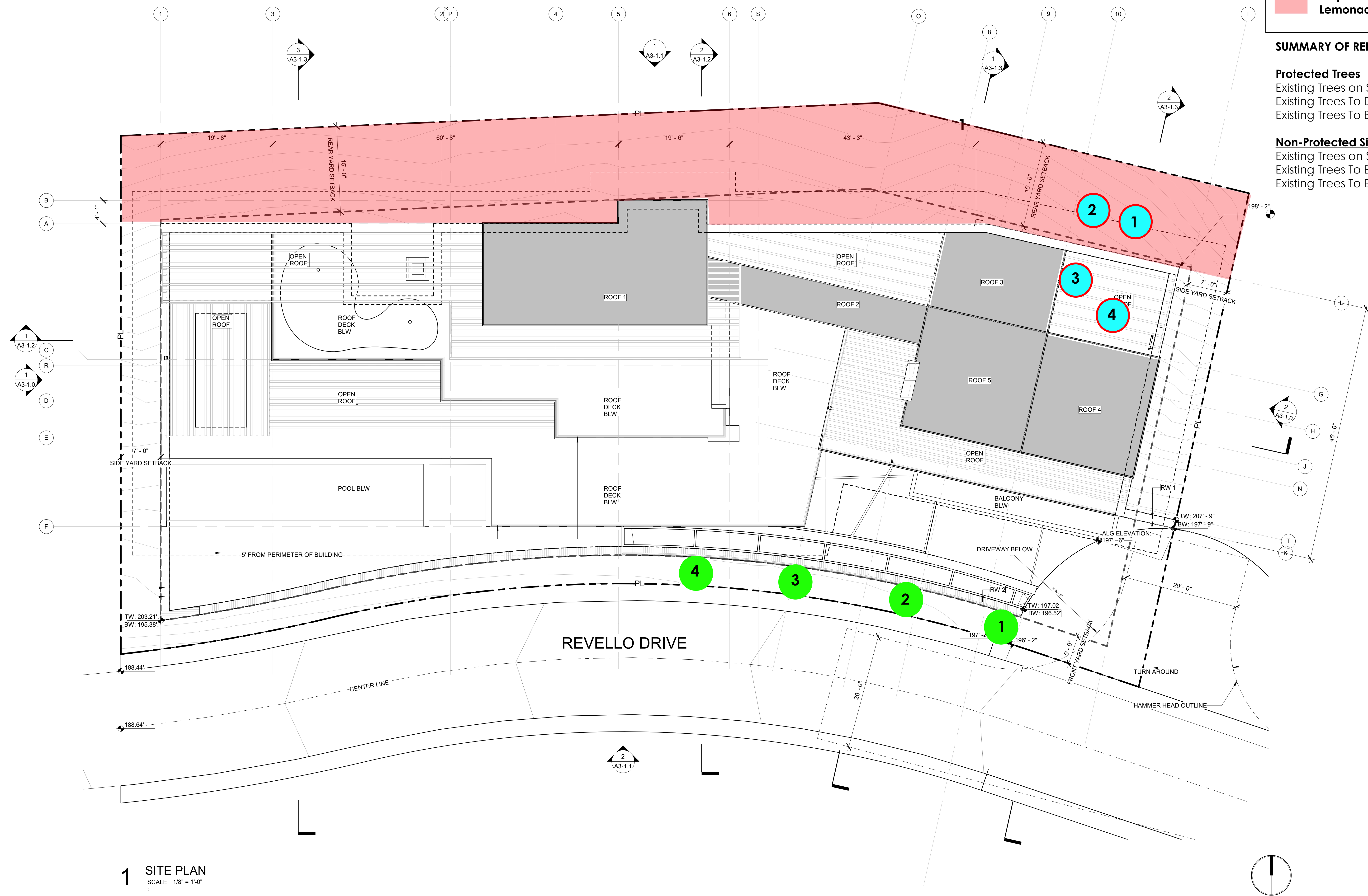
### Protected Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

### Non-Protected Significant Trees

Existing Trees on Site: 1  
Existing Trees To Be Removed: 1  
Existing Trees To Be Replaced: 1





## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

## SUMMARY OF REPLACEMENT TREES

### Protected Trees

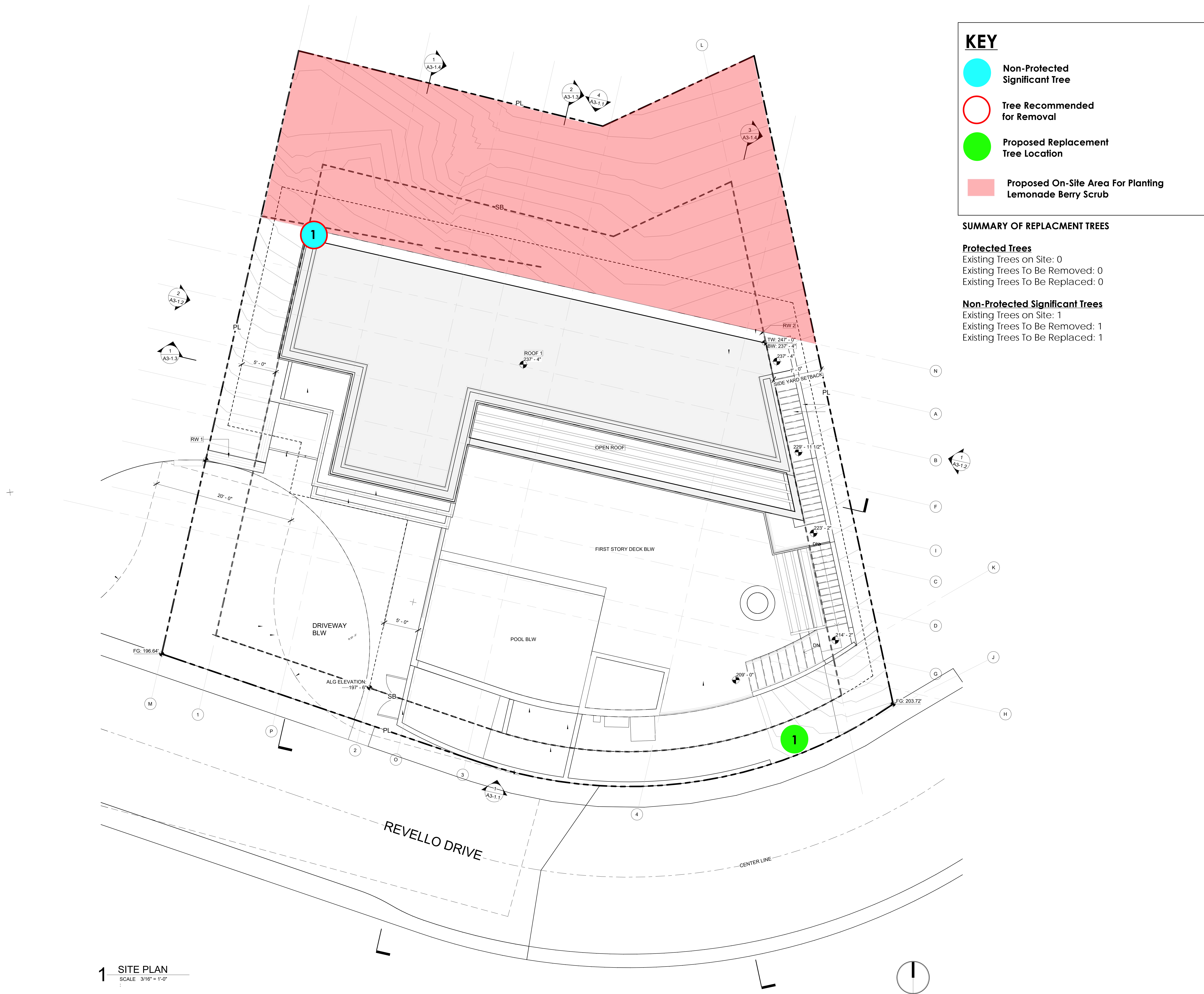
Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

### Non-Protected Significant Trees

Existing Trees on Site: 4  
Existing Trees To Be Removed: 4  
Existing Trees To Be Replaced: 4

**1 SITE PLAN**  
SCALE: 1/8" = 1'-0"





**KEY**

Non-Protected  
Significant Tree

Tree Recommended  
for Removal

Proposed Replacement  
Tree Location

Proposed On-Site Area For Planting  
Lemonade Berry Scrub

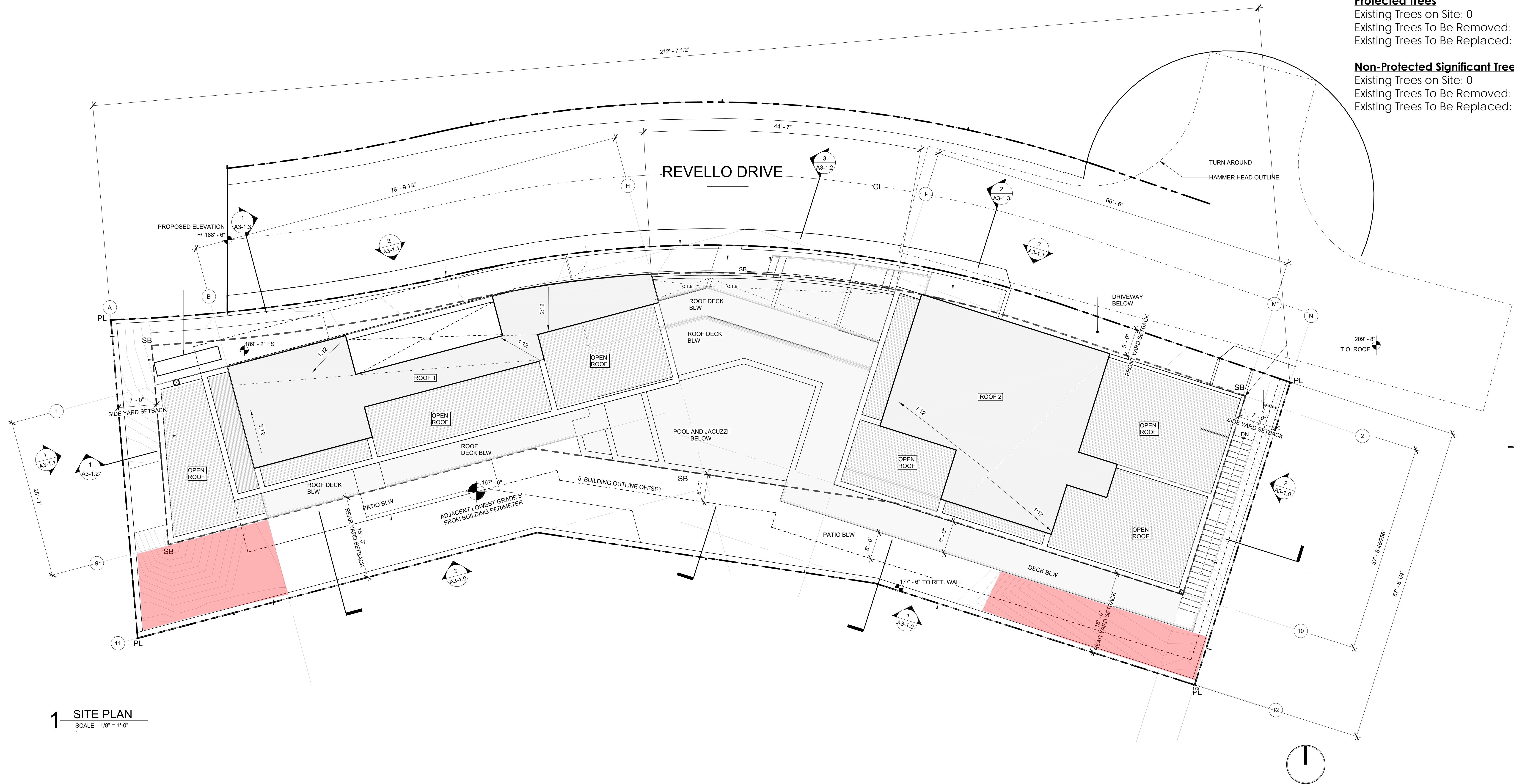
**SUMMARY OF REPLACEMENT TREES**

**Protected Trees**  
Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

**Non-Protected Significant Trees**  
Existing Trees on Site: 1  
Existing Trees To Be Removed: 1  
Existing Trees To Be Replaced: 1

1 SITE PLAN  
SCALE 3/16" = 1'-0"





1 SITE PLAN  
SCALE 1/8" = 1'-0"

## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

### SUMMARY OF REPLACEMENT TREES

#### Protected Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

#### Non-Protected Significant Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

# **Attachment B**

## Vegetation Communities and Proposed Planting Corridors





- Study Area (500-Foot Buffer)
- Project Boundary
- County Parcel Boundary
- Vegetation Communities and Land Cover
- DEV, Urban/Developed
- DH, Disturbed Habitat
- ORN, Ornamental Vegetation
- dAtrlen, Disturbed Quailbush scrub (*Atriplex lentiformis*) Alliance
- dRhuint, Disturbed Lemonade berry scrub (*Rhus integrifolia*) Alliance
- Project Impacts**
- Permanent
- dRhuint, Disturbed Lemonade berry scrub Removed in November 2020 (3,530.5 SF)
- dRhuint, Disturbed Lemonade berry scrub To Be Removed (20,912.04 SF)
- Proposed Lemonade Berry Planting Corridor



SOURCE: Los Angeles County 2011, Bing Maps 2019





14809 Pacific Coast Highway  
Santa Monica, CA 90402

April 25, 2022

Los Angeles City Planning Department  
c/o Makan Baranghoori  
200 N. Spring Street, Room 720  
Los Angeles, CA 90012  
[makan.baranghoori@lacity.org](mailto:makan.baranghoori@lacity.org)

Re: DIR-2019-6352-CDP-MEL for  
17538, 17544, 17550 Tramonto Drive ("SHP 1")  
DIR-2019-5524-CDP-MEL and ZA-2019-5525-ZAD for  
17532, 17540, 17548 Revello Drive ("SHP 2")  
DIR-2019-5571-CDP-MEL; ZA-2019-5574-ZAD for  
17523, 17529 Revello Drive ("JDR 1")  
DIR-2019-5584-CDP-MEL and ZA-2019-5585-ZAD for  
17533, 17537, 17541, 17547 Revello Drive ("JDR 2")  
ENV-2019-5520-MND  
(collectively referred to as the "development" or the "project")

City Planning,

On behalf of Springhouse Hamilton Park, LLC and JDR Revello LLC (collectively "Applicant"), I write in response to Coastal Commission Staff's letter of October 13, 2022 (see Exhibit 1). For ease of reference, the nomenclature corresponding to the specific responses below coincide with that used by Coastal Commission Staff ("Staff"). The exhibits referenced herein can be accessed via the download link at the bottom of this letter.

#### 1a. Response to Staff Comments Regarding Geology and Soils

There are several incorrect or misleading statements made by Staff that should be corrected for the record. First, Staff states "[i]n terms of geological susceptibility, the project as currently proposed may cause or contribute to erosion, liquefaction, and surface rupture." This statement is not true.

The geologic stability of the project site has been studied and analyzed ad nauseum. The proposed development is not located in a liquefaction area but is in an active landslide. The project proposes ground improvements that will remediate the slope failures occurring within the limits of the proposed development site. In addition, the project also proposes building structures, sloped hardscapes and graded softscapes that would capture and convey water runoff into an approved drainage device (i.e. the existing aboveground storm drain pipe in front of 17526 Revello Drive). As such, the proposed development would make the site far less susceptible to erosion and surface rupture compared to its current condition.

Second, Staff states “[i]n a site visit on December 9, 2021, Commission Staff witnessed site conditions that suggested that substantial grading and removal of vegetation had already taken place without the benefit of a coastal development permit.”

To suggest that substantial grading had already taken place is unequivocally not true. Applicant has never performed grading work on any lot included in the proposed development. However, Applicant has drilled several deep borings on these lots that required the use of heavy track-mounted machinery.

The attached site photos were taken in April 2009 by the City of Los Angeles, Bureau of Engineering (see Exhibit 2). These pictures were provided to Applicant under a CPRA request. The topography and grade conditions shown in these pictures resembles that of today’s conditions.

The attached LADBS Information Bulletin provides rules and regulations that apply to subsurface exploratory work (i.e. borings) on hillside lots (see Exhibit 3). Page 3 states: “[e]xploratory borings, less than 30 inches in diameter, and test pits that are performed under the direction of a licensed engineer or geologist do not require a grading permit. Any other grading work, such as to create access roads or equipment pads, requires a grading permit.” No access roads or equipment pads were created, and the borings performed were done with a 24-inch diameter bucket auger under the supervision of Stoney Miller Consultants, a license engineer and geologist. Thus, a permit to perform these borings was not required.

As discussed during a call with Staff on February 3, 2022, Applicant made the decision to clear these three Tramonto lots for several reasons. Applicant received numerous complaints from the neighborhood regarding the disturbance caused by the nefarious activities committed by the people illegally trespassing and loitering on these properties. These activities included smoking, drinking, doing drugs, having small camp-fires and even sleeping on a couch that was brought to the site. The paraphernalia found on these Tramonto properties corroborated the neighbor’s statements. The canopies from the taller brush on these properties provided cover for them to commit these illegal activities. In addition, these activities posed significant liability and danger for the Applicant and neighborhood (i.e. potential brush fires and an increased number of car break-ins and even assaults). As a result, Applicant cleared these three properties in late November 2020 during the height of the pandemic.

It is also worth noting that the LAFD minimum brush clearing requirements call for a substantial removal of vegetation from any property in a high fire hazard severity zone such as these Tramonto lots, which includes the cutting of grass so that it is no more than three inches and the trimming of any shrub or tree from the ground to one-third of its total height up to six feet (see Exhibit 4, page 4). In years past, Applicant did not meet such minimum requirements and was cited by LAFD (see Exhibit 5).

As discussed in the published Initial Study with Mitigative Negative Declarations (the “IS-MND”), the sensitive habitat consisting of the lemonade berry scrub community on these Tramonto properties is significantly disbursed, which makes sense given Applicant’s preceding comments. According to Dudek’s GIS Division, 3,297.3 square feet of the disturbed lemonade berry scrub was cleared from these three Tramonto properties. Additionally, no protected trees were removed as no protected trees exist on the site per Applicant’s tree report dated September 13, 2019, which was subsequently approved by LA Urban Forestry Division shortly thereafter.

The attached aerial map from the IS-MND shows the site boundaries and the disbursed lemonade berry scrub areas (see Exhibit 6). The three Tramonto lots that were cleared are outlined in blue on this map. To offset the sensitive habitat removed from these properties, Applicant offered, on

February 25, 2022, to make immediate arrangements with the CDFW approved mitigation bank (Soquel Canyon) to replace the severely disbursed lemonade berry scrub community with a pristine community on a 2:1 basis which is 6,595 square feet or 0.15 acres of habitat. To date, Applicant has not heard back from either Planning or Staff regarding Applicant's offer.

It should be made clear that Applicant's environmental consultant, Dudek, thoroughly documented the existing vegetation across the entire project site prior to the clearing of these Tramonto lots as per their site visits on November 12, 2019 and June 16, 2020 referenced in their various reports.

Staff states that "[t]he applicant must show that the currently proposed grading and stabilization structures (caissons and retaining walls) are the minimum necessary landform alteration to satisfy stability standards and the Order to Comply."

In June 2019, Applicant initially submitted geology and soil reports prepared by Stoney Miller for the proposed project to the Los Angeles Department of Building and Safety ("LADBS") Grading Division for review. These reports proposed a slope stabilization plan that included what the Applicant and their consultants initially believed to be the absolute minimum necessary ground improvements (i.e. grading work, piles and retaining walls) to remediate the slope failures occurring on these properties in order to comply with their respective Orders to Comply issued by the City of Los Angeles. The LADBS Grading Division issued correction letters dated July 25, 2019 stating that the proposed stabilization plan was deficient for a variety of reasons and did not satisfy the minimum stability standards (see Exhibit 7).

Over the next 14 months, Applicant submitted nine additional geology and soil reports to the LADBS Grading Division. Each supplemental report proposed incremental changes to the then operative slope stabilization plan based only on that which were required by the LADBS Grading Division per their review of such report at that time. In September 2020, the LADBS Grading Division issued an approval letter for a stabilization plan that requires substantial excavations, numerous retaining walls and multiple rows of piles placed under and outside the proposed building envelopes (see Exhibit 8).

As demonstrated by the number of additional reports prepared by Applicant's geo. consultants, Applicant made every attempt to perform what they then believed to be the minimum necessary landform alteration to satisfy the stability standards and the Orders to Comply. This was also confirmed on February 23, 2022 during the 14-person conference call Applicant had with Staff, the LADBS Grading Division and the Bureau of Engineering, Geotechnical Division to discuss the possibility of reducing the scope of work required under the approved stabilization plan and, in particular, the amount of landform alteration and protective devices outside the building envelopes.

During the call, the LADBS Grading Division stated they would not approve any proposed stabilization plan that would reduce the amount of grading work or the number of piles outside of the proposed building envelopes as this work is required to: (1) achieve the minimum factors of safety for the entire development site required by LADBS; (2) achieve the minimum factors of safety to protect the public right-of-way fronting the development site required by LADBS and the BOE; (3) remediate the slope failures occurring on these properties and comply with the respective Orders to Comply issued by the City of Los Angeles; and (4) allow for the future development of the vacant lots directly below once this site has been stabilized.

Staff states "[t]he applicant should provide an alternatives analysis that explores options to reduce landform alteration." On March 23, 2022, the Applicant sent Planning and Staff an analysis that explored eleven different development and slope stabilization alternatives (see Exhibit 9). Each alternative was thoroughly considered as to their feasibility by the relevant project consultants.

The four alternatives identified under 6A, 6B, 7A and 7B are all feasible in that each alternative allows the property owners to comply with their respective OTC and meet the minimum safety factors required under the law. However, the one that requires the least amount of grading work and that which is least impactful, both visually and environmentally, is Alternative 6B, which is the current proposed development and stabilization plan. The relevant quantities for each alternative are summarized in the attached table (see Exhibit 10). The Site Plans that conceptually illustrate the feasible alternatives are also attached (see Exhibit 11). A summary of each alternative is described below.

- Alternative 1 consists of no piles, no homes and no remediation work to the entire site;
- Alternative 2 consists of no piles, no homes and the complete removal and compaction of the disturbed landslide material across the entire site;
- Alternative 3 consists of piles across the entire site with no homes;
- Alternative 4A consists of building 12 smaller homes propped-up on the slope with no basements supported by piles under, but not outside, each home;
- Alternative 4B consists of building 4 larger homes propped-up on the slope with no basements supported by piles under, but not outside, each home;
- Alternative 5A consists of building 12 smaller homes at street level with basements supported by piles under, but not outside, each home;
- Alternative 5B consists of building 4 larger homes at street level with no basements supported by piles under, but not outside, each home;
- Alternative 6A consists of building 12 smaller homes at street level with basements supported by piles under and outside each home;
- Alternative 6B is the operative proposed development plan that consists of building 4 larger homes at street level with no basements supported by piles under and outside each home;
- Alternative 7A consists of building 12 smaller homes at street level with basements supported by piles under and outside 9 homes and the removal and recompaction of the distributed landslide material under Revello Drive and the 3 homes on 17532, 17540 and 17547 Revello Drive;
- Alternative 7B consists of building 4 larger homes at street level with basements supported by piles under and outside 3 homes and the removal and recompaction of the distributed landslide material under Revello Drive and the 1 home across 17532, 17540 and 17547 Revello Drive.

Staff also asks the applicant to, at least, analyze the following alternatives:

1. A scenario where the caissons are proposed to be as close to the residences as possible so that the caissons stabilize the footprint of the homes rather than the whole site. The Applicant's analysis covers this scenario in Alternatives 4A, 4B, 5A and 5B and explains why these alternatives are not possible.
2. A scenario that partially daylights the basements and/or removes them entirely from the proposed homes/structures. The Applicant's analysis covers this scenario in Alternatives 5A and 5B and explains why these alternatives are not possible.
3. A scenario that supports the residences on pier foundations that would allow for continued slope movement above the existing failure plane. The Applicant's analysis covers this scenario in Alternatives 4A and 4B and explains why these alternatives are not possible.
4. A scenario that includes smaller home sizes and/or clustering of the development. The Applicant's analysis covers this scenario in Alternatives 4A, 5A, 6A and 7A and explains why Alternatives 4A and 5A are not possible.

Staff also asks Applicant to "describe in greater depth the slope retention methods (such as retaining walls) proposed to stabilize the Revello Drive extension". The Applicant submitted a geology and soil

report dated December 1, 2020 prepared by Stoney Miller to the Bureau of Engineering, Geotechnical Engineering Division for the proposed project (see Exhibit 12). This report consolidates and restates all the approved recommendations contained in the 10 reports previously submitted to the LADBS Grading Division but with a focus on the roadway improvements and extensions on Revello and Tramonto Drive.

The roadway improvements within the right-of-way fronting the home on Tramonto Drive include a descending ramp to access the proposed home that sits below the existing street. The north side of this ramp will be protected with a permanent new wall system directly in front of the existing bulkhead in certain areas to accommodate the lowering of the grade for this ramp. This wall varies in height from approximately 1 to 10 feet. The analysis and illustrations for this wall are contained in the report under Appendix H and are graphically shown on Plates 6r, 7r and 8r. The south side of this ramp will be protected by the downslope rows of piles (denoted as SPR-7, SPR-8, SPR-9 on Plate 6r) along with the retaining wall that is part of the proposed Tramonto home (denoted as RW-A1, RW-A2).

The roadway improvements within the right-of-way fronting the homes on Revello Drive include an ascending roadway extension to access the three proposed homes. This roadway extension would be stabilized by the three downslope rows of piles (denoted as SPR-1 to SPR-3), the retaining wall that is part of the proposed downslope home (denoted as RW-C), the six upslope rows of piles (denoted as SPR-4 to SPR-9) and the building structures that make up the two proposed upslope homes. In addition, the ascending roadway design requires a conventional retaining wall along the south side of the roadway, essentially between cross-sections JR and DR, that traverses upslope (to the north) to capture the western terminus of the roadway extension. The retaining wall at the terminus of the roadway would be supported by 3 or 4 piles placed within the right-of-way directly below the wall, which runs diagonally from northeast to southwest (see Exhibit 12, Plate 6r). Remedial grading is also recommended within the limits of the roadway improvements on Tramonto and Revello to include the removal and recompaction of approximately 5 feet of soil and, if required, geogrid reinforcement to prevent settling under the roadway.

#### 1b. Response to Staff Comments Regarding Hazards and Hazardous Material

Staff states "Coastal Act Section 30253(a) requires the minimization of risk to life, in addition to property, in areas of high fire threat. As such, Commission Staff ask the applicant to analyze the risk of wildfire threat to life and property at the site, including any necessary mitigation and adaptation strategies (fireproofing, weatherization, fuel modification, emergency irrigation systems, etc.). There should be discussion of how such mitigation and adaptation strategies minimize the threat of wildfire hazard at the site and in the surrounding area."

As stated in the published IS-MND, the project proposes roadway improvements that include a turnaround per LAFD regulations and design standards that will allow emergency and fire-responding vehicles to safely and promptly access and traverse that portion of the hillside and to be able to turn around at the terminus of Revello Drive, which currently is not possible. The improvements also propose the installation of a fire hydrant further west to better assist LAFD in the suppression and prevention of any fire hazard spreading in the area.

The life-safety aspect of the proposed project is subject to the purview of certain agencies such as LADBS, the Bureau of Engineering ("BOE") and the Los Angeles Fire Department ("LAFD"). Each home will also be compliant with the vested codes including, but not limited to, the Los Angeles Municipal Code ("LAMC"), the California Building Code ("CBC") and the California Fire Code ("CFC"). Some of the life-safety and mitigation and adaptation strategies include:

- installing automatic fire suppression/sprinkler systems in each home that is NFPA13 or better;

- using tempered glass for exterior doors and windows;
- using predominantly non-combustible materials such as concrete, steel and glass to construct the building exterior shell;
- constructing exterior wall and ceiling assemblies to have a one-hour fire-rating; and
- brush clearing and fuel modification will be performed around each home where appropriate while protecting/mitigating against environmental impacts.

## 2. Response to Staff Comments Regarding Biological Resources and Environmentally Sensitive Habitat Area (ESHA)

Based on Staff's comments pertaining to the on-site biological resources, Applicant and Applicant's consultants believe Staff is not aware of certain past events and the sequence in which these events occurred. Below is a chronology of relevant events that will hopefully help Staff better understand the extensive environmental and biological review process that has occurred to date for the proposed development.

From August 17, 2018 to February 20, 2019, Applicant purchased the 12 vacant lots included in the proposed project.

In January 2019, Applicant performed a series of borings on the nine Revello lots. In April 2019, Applicant performed several borings on the three Tramonto lots. As stated above, no grading work was performed.

In May 2019, brush was cleared from the entire site per LAMC and LAFD brush clearing requirements.

In August 2019, licensed arborist Lisa Smith with The Tree Resource visited the site to perform a tree survey. In September 2019, tree reports were submitted to the Urban Forestry Division for the four homes included in the proposed development. In October 2019, Urban Forestry approved all four tree reports, which are included in the published IS-MND under Exhibit C. The approved reports confirm there are not any protected trees on-site.

On November 12, 2019, biologists Tracy Park and Eileen Salas with Dudek visited the site to perform an initial biological survey to: (a) map the vegetation communities and land covers present within the study area, (b) perform an initial assessment of the quality of vegetation on-site, (c) perform an evaluation of potential jurisdictional wetlands or waters and (d) perform an evaluation of the potential for special-status species to occur in the study area.

On January 9, 2020, Applicant submitted Dudek's initial Biological Resource Letter Report (BRLR) dated November 27, 2019 which incorporated the findings from the biological survey performed on November 12, 2019.

On May 15, 2020, Planning asked Applicant to perform an Initial Study based on their internal review of the proposed project with the Environmental Staff Advisory Committee "ESAC".

In May 2020, brush was cleared from the entire site per LAMC and LAFD brush clearing requirements.

On August 31, 2020, Applicant submitted Dudek's Initial Study to Planning, which contained an updated BRLR dated July 9, 2020. The updated BRLR incorporated yet another biological survey performed by Tracy Park and Michael Cady on June 16, 2020 to refine the biological mapping and to do a focus survey for botanical resources.

On November 9, 2020, Planning asked Applicant to perform an Initial Study with Mitigative Negative Declarations ("IS-MND"). On November 19, 2020, Applicant submitted Dudek's initial IS-MND dated November 16, 2020 to Planning.

In late November 2020, Applicant cleared the vegetation on the three vacant lots located at 17538, 17544 and 17550 Tramonto Drive.

Over the next 7 months, Planning and other agencies performed an even more extensive environmental and biological review of the proposed development. During this time, Applicant updated the IS-MND five times and the BRLR three times based on comments received from Planning and other reviewing agencies including CDFW. To address certain comments from these reviewing agencies, Tracy Park visited the site for a third time on February 1, 2021 to perform a vegetation rapid assessment to further define the quality of the vegetation community on-site, which is a CDFW approved methodology. However, all reports and updates included the vegetation that existed prior to the clearing of the Tramonto lots in late November 2020 and provide analysis regarding the impacts to said vegetation.

In May 2021, brush was cleared from the entire site per LAMC and LAFD brush clearing requirements.

On May 25, 2021, CDFW submitted a draft of their initial comment letter that was later revised and resubmitted on September 16, 2021 (see Exhibit 13). On September 28, 2021, Dudek provided a technical response (see Exhibit 14) that incorporated Tracy Park's fourth site survey performed on September 27, 2021 to confirm monarch butterflies and bats were not roosting on-site.

On March 10, 2022, approximately 7 months after the IS-MND was published in August 2021, Planning informed Applicant that Staff would like additional analysis to be performed to investigate the potential for the project site to include an environmentally sensitive habitat area (ESHA). On March 25, 2021, Dudek provided a memorandum in response to Staff's request (see Exhibit 15).

Staff states "[a]fter the December 9, 2021 site visit and visible evidence of unpermitted grading and plant removal, Commission staff called into question the assertion that the site has been degraded over the long-term and/or without significant habitat values."

Staff's comments insinuate that the habitat on-site was recently degraded by unauthorized grading operations, which is not true. As discussed above, Applicant has never performed any grading work on-site. Staff has also not provided any evidence to support their allegation.

Staff states "[i]n previous discussions, Commission staff expressed to the applicant and City staff that even under circumstances where habitat may be degraded, it may still be considered ESHA. Furthermore, as evidenced from historic satellite imagery, prolific lemonade berry stands covered the site as recently as January 2020. Thus, the Commission's staff ecologist has determined the potential for ESHA to exist on the site."

First, Staff does not specify in their letter or the referenced ESHA memorandum under what circumstances degraded habitats could still be considered ESHA. Second, it appears that Staff has determined the potential for ESHA to exist on-site based solely on their belief from satellite imagery that there was an abundance of lemonade berry stands covering the site as of January 2020. However, Staff has not provided any historic satellite imagery to support this statement or their methodology for how their ecologist determined this vegetation to be a lemonade berry scrub vs. a quailbush scrub or ornamental vegetation. This determination cannot be done by reviewing satellite imagery but rather via site surveying. Fourth, even with accurate mapping, the quality of this vegetation cannot be determined from satellite imagery. Fifth, the Coastal Commission has not



defined the boundaries for ESHA in this area such is the case in the City of Malibu. In contrast to Malibu properties, the project site is immediately surrounded by infill properties to the north, west and east and the ocean to the south. It is not a corridor for wildlife.

Finally, Dudek concluded that: (a) the distributed lemonade berry scrub does not meet the criteria to be designed as an ESHA, as defined in the memorandum referenced by Staff, and (b) an ESHA does not exist within the limits of the project site. It is important to note that Dudek's findings are supported by multiple site visits and extensive studies and analyses performed over the past 30 months that also take into consideration input and comments from multiple reviewing agencies such as ESAC and CDFW.

Staff states "[a] more extensive analysis of the potential for ESHA will need to be conducted as part of the Coastal Commission CDP process. Nevertheless, at this preliminary stage, Commission staff call into question whether the aforementioned disturbance factors would necessarily qualify the site as not ESHA."

During Coastal's CDP process, Applicant will meet and confer with Staff in an effort to better understand what additional information and analysis is needed to show that an ESHA does not occur within the limits of the project site. However, for reasons explained above, Applicant believes the IS-MND and the supplemental reports/responses include a preponderance of evidence regarding the biological resources on-site that would aid in such a determination that an ESHA does not exist on-site.

Staff states "[a]s the Dudek memo correctly notes, lemonade berry scrub alliance has a rank of S3 rarity by CDFW, and quailbush scrub alliance has a rank of S4 rarity. As such, prior to the Commission's CDP application process, Commission staff urge the applicant to work with CDFW and other relevant resource agencies to establish criteria for sensitive habitat identification and management at the site."

As noted in the chronology above, over the past 30 months, Applicant has worked closely with CDFW and other relevant resource agencies via the lead agency Planning. Comments provided by these agencies have been further studied, analyzed and incorporated in the published IS-MND accordingly. Moreover, Applicant has proposed mitigation measures, which have been guided by the comments from these relevant agencies.

Staff states "[i]n addition, Commission staff would appreciate a reconstruction of the most probable ecological landscape at the site prior to recent human disturbance and vegetation clearing. Detailed discussion of the sensitive species inferred to be onsite should be included. Since there may not be enough evidence to definitively conclude the historic prevalence of specific ecological niches, geobiological gradients, and ecotones onsite, then specific mitigation, restoration, and/or habitat creation frameworks/metrics should also be developed in response to past, present, and future habitat degradation."

As noted in the chronology above, prior to the vegetation being cleared on the three Tramonto lots in late November 2020, Dudek's biologist visited the site twice to carefully map the vegetation communities and a BRLR was prepared. Thus, the actual (not most probable) ecological landscape was established. The BRLR discusses, in detail, the sensitive species that actually occur on-site so speculation is not necessary. Therefore, there is enough evidence to definitively conclude the historic prevalence of specific ecological niches, geobiological gradients, and ecotones on-site. In addition, the IS-MND provides mitigation measures based on the well documented biological resources occurring on-site prior to clearing the vegetation on these Tramonto lots.

Staff states "[i]f fuel modification is required for the project, the applicant should additionally outline the balance between reducing fire hazards and enhancing biological diversity and sensitive species at the site.

As discussed above, fuel modification measures are required per LAMC. However, as part of the IS-MND, the Applicant is proposing to mitigate the removal of the sensitive species on-site by funding an off-site mitigation bank that will replace the disturbed special status vegetation communities occurring on-site on a 2:1 basis. Additionally, the Applicant will propose native vegetation where feasible with low fire combustibility ratings to ensure that native vegetation exists on-site while minimizing fire hazards. If allowed by LAFD, the Applicant will use best efforts to replace/replant the lemonade berry scrub on-site in the areas denoted in the attached preliminary landscape plans (see Exhibit 16). The cumulative on-site area is approximately 5,700 square feet, which would be in addition to the off-site mitigation measures referenced above.

### 3a. Response to Staff Comments Regarding Utilities/Service Systems

Staff states "[t]he subject lots have never been developed with residences, and the roads that were truncated by the Tramonto Slide finally closed by 1959."

This is not correct. Three single-family homes were once erected on 17538, 17544 and 17550 Tramonto Drive. All three homes were destroyed by the landslide in the late 1950s. Even today, there are still remnants of the building foundations that once existed higher up on the hillside closer to Tramonto Drive.

Staff states "[t]he MND goes into some depth regarding the proposed utility systems proposed for the site...While the report states that transmission and distribution conduits, systems, storage facilities, metering, and billing will be made available for a variety of necessary utility services, it is not clear how those would be established in the first place. Additional discussion of how the applicant or City intends to facilitate the establishment of utility and service systems at the site, and how such systems would be consequently integrated into the proposed residences is not provided."

The three Tramonto properties are infill lots. Gas, power, water, sewer, data and telecommunication lines have already been established as they currently run under Tramonto Drive directly in front of the three Tramonto lots. The attached utility map, which was provided by the City of Los Angeles, shows these utility lines being approximately 25 feet from their point of connection to the Tramonto home (see Exhibit 17).

The nine Revello properties are also infill lots. Gas, power, water, sewer, data and telecommunication lines have already been established as they currently run under Revello Drive directly in front of 17526 Revello Drive. The attached utility map, which was also provided by the City of Los Angeles, shows these utility lines being no more than approximately 60 feet from their point of connection to the three Revello homes (see Exhibit 18).

The engineering for connecting to the nearby existing utility transmission and distribution facilities for the four proposed homes will be designed and coordinated by and among the Applicant's consultants, the BOE and each respective utility company.

### 3a. Response to Staff Comments Regarding Sustainability

Staff states "[t]here should be additional discussion of the Title 24 (California Green Building Code) and CPUC requirements or measures taken to make the development more sustainable; the applicant should detail any proposal for LEED certification, installation of solar panels, greywater

treatment and filtration, use of high-efficiency appliances and fixtures, low-water irrigation, and other measures to decrease energy consumption as required by Section 30253(d) of the Coastal Act. Such analysis would help Commission Staff determine whether the project complies with Coastal Act Sections 30250 and 30253(c) and (d)."

A full, comprehensive Low Impact Development (LID) site analysis and civil engineering design shall be submitted and approved by the City of Los Angeles, Bureau of Sanitation prior to construction. The LID package includes Best Management Practices (BMP) such as bioswales and biofiltration areas to retain and filter stormwater runoff from the site, permeable surfaces, and rainwater collection techniques. The project shall also comply with the requirements of the LADBS "Mandatory Requirements Checklist" and 2017 Los Angeles Green Building Code. High water efficiency plumbing fixtures will be proposed and installed in accordance with new California Plumbing Code Standards. High efficiency lighting fixtures (i.e. LED) will be proposed and installed in accordance with the new California Electrical Code Standards. Post-construction landscaping shall use native, drought tolerant plant and tree species where possible. Post-construction landscape planting shall restore, as much as possible, areas disrupted. The project shall also comply with the requirements of the LADBS "Mandatory Requirements Checklist" and 2017 Los Angeles Green Building Code. These regulations ensure projects comply with the latest energy efficient standards outlined in the Green Building Code. HERS QII inspections will also be performed during construction to ensure optimal installation methods to yield the maximum efficiency from the building materials used to construct these homes.

### 3b. Response to Staff Comments Regarding Scenic and Visual Resources

Staff states "[i]n order to ensure that prominent structural elements...of the proposed residences will not be visible along PCH and the adjacent beach, nor from any public roadways, or parklands, the applicant should prepare a visual analysis to simulate the potential impacts. Visual analysis should be conducted from a variety of angles, public vantage points, and topographical reliefs."

Applicant sent Planning a view study in April 2020 to simulate the potential visual impacts from the proposed project (see Exhibit 19).

Staff also states "[p]ublic views of the coast are prioritized, and therefore, visual obstruction from public roadways is of biggest concern."

The Tramonto home is developed below the elevation of the existing roadway and will therefore not impact any existing views of the Coast as currently proposed. The two upslope Revello homes, which are directly below the proposed Tramonto home, will also be well below the elevation of Tramonto Drive and therefore will not impact any views of the coast. Additionally, the proposed downslope home on Revello Drive will be sited such that any view from the newly improved public road would only contain a one-story facade. Due to the grade, the other levels of this home would be down the slope and below the elevation of the public road. Therefore, view obstructions of coastline would be minimized in all instances.

Staff states "the applicant should also study the potential for caisson or pile exposure over the life of the development via erosion-rate modeling."

Applicant initially addressed the potential for erosion to occur on page 5 of Stoney Miller's Geology and Soil Report dated October 24, 2019. Stoney Miller provides a more detailed response in their attached report dated April 25, 2022 (see Exhibit 20).

Staff states "[i]f the caissons are likely to be exposed, then the applicant should analyze mitigation measures that visually and aesthetically treat the piles to match the surrounding terrain, or otherwise install a skirt to cover the exposed piles. Vegetation and landscaping proposals should also be included as part of the discussion of consistency of the project with Section 30251 of the Coastal Act."

The project is well in conformance with the provisions of Section 30251 of the Coastal Act. Views from the coast and PCH will not be affected as the proposed project will be sited in an area surrounded by single-family home development. Furthermore, Staff can look to the findings for 5-18-0393 & A-5-PPL-18-0057 (17642 Tramonto) and derive similar conclusions for the subject case file, which consists of a 8,823 square-foot, 50.6 foot tall single-family home. The case file's approved staff report is attached (see Exhibit 21). An excerpt from this staff report reads as follows (see highlighted text on pages 12 and 13):

"The subject lots are significantly steeper than the surrounding lots within the Castellammare area. Due to the steep topography of the lots, the site is highly visible from PCH and the beach. Because the site is designated a scenic area and is highly visible from the beach and PCH, any new development on the lots should be compatible with the neighboring structures in the area with regard to mass and scale. In order to analyze a project's consistency with community character, Table 1 below shows the envelope height or existing structures as assessed by a neighbor, as well as the City's assessment, including residential floor area (RFA) of the row of development seaward of Tramonto Drive.

As revised, the applicant proposes to construct a new residence with a height envelope of 50.6 ft. The residence is designed to be built into the hillside by excavating approximately 4,000 c. y. of earth. The structure would be visible from PCH and the beach, appearing to be 47 ft. tall. The western and eastern elevations would not be visible because the proposed structure would be located in between two homes. The northern elevation along Tramonto Drive would rise to a height of approximately 10 ft. above the street, which is consistent with the neighboring homes.

According to Table 1, the floor area of homes along the seaward side of Tramonto Drive fall between 1,525 sq. ft. and 6,046 sq. ft. and envelope heights range from approximately 31 ft. to 84 ft. The proposed project would be the largest home along the seaward side of this section of Tramonto Drive; however, the main residence would be located landward of the existing stringline and would not extend further down the slope than neighboring homes. The downslope limit of the neighboring structures located adjacent to the proposed structure at 17646 and 17630 Tramonto Drive terminates at approximately 279 ft. above sea level, similar to the proposed structure. Additionally, these adjacent structures are similar in height to neighboring homes from the south elevation (Exhibit 9). In order to ensure approved development is consistent with the applicant's revised plans, Special Condition 1 requires the applicant to submit final revised plans that show the site plan, elevations, cross sections, and structural plans of the proposed development. Accessory development such as a swimming pool and decks do not always require a CDP according to Section 13250 of the Commission's regulations. However, in order to protect the visual qualities of this area Special Condition 2 requires that future improvements consisting of any accessory development seaward of the primary residence must obtain a separate CDP or amendment to this CDP. [Emphasis added]

The applicant also proposes a 10-ft. tall, 178-ft. long pile-supported retaining wall that spans the entire southern property boundary line that aims to stabilize the site and existing landslide debris from further slippage and erosion that could impact downslope areas, including a neighboring home and a planned public walkway area. The wall would be landward of an approved development (CDP 5-15-2074) and would not be significantly visible from public viewpoints. However, in order to reduce the visibility of a vertical wall, the applicant proposes to landscape the wall with Pink "California" Honeysuckle (*Lonicera hispidula*), a shrubby vine plant that is native to California and Pacific Coast states, as seen in the landscape plan dated January 18, 2017 and submitted by the applicant (Exhibit 3). The plant is designated as low water and would not require additional irrigation once established<sup>2</sup>. Thus, Special Condition 3 requires that the applicant comply with the landscape plan provided to minimize impacts of the wall from public views. Special Condition 4 assures that the applicant maintain the façade of the retaining wall with native, drought-tolerant landscaping as described above. The applicant's geotechnical engineer determined in their report that exposure of caissons, grade-beams, and/or piles from slope retreat are unlikely to occur over the life of the structure because the site exhibits a relatively shallow bedrock layer that is not significantly subject to erosion in the future. Nevertheless, to minimize landform alterations and visual impacts of the project, Special Condition 5 requires that the applicant cover or color any caissons that are exposed in the future due to episodic erosion from seismic activity and such. In addition, the applicant has modified the project description to remove accessory development located seaward of the proposed primary residence, which reduced the number of caissons required to support the proposed development by 15. Therefore, the project minimizes landform alterations and visual impacts of the development from public viewpoints, including impacts of the proposed foundation support system and retaining wall. [Emphasis added]

As such, the proposed development, that is located within an existing developed area, has been redesigned and sited to be contiguous with the existing stringline of development. As conditioned, the proposed development will be compatible with the character and scale of the surrounding area and minimizes landform alterations and visual impacts of the proposed development. Therefore, the Commission finds that the development, as conditioned, conforms with Sections 30250 and 30251 of the Coastal Act."

Furthermore, all prominent structural elements (such as caissons and piles) will be below grade and therefore not visible from any public vantage point. However, if such caissons/piles are exposed during the life-cycle of the building structure(s), the Applicant is willing to adhere to the same conditions in the approved staff report of case file 5-18-0255 for 14948 Corona Del Mar (see Exhibit 22). An excerpt from this staff report reads as follows (see highlighted text on pages 6 and 7):

"Structural Appearance (Foundation Exposure). PRIOR TO ISSUANCE OF THIS PERMIT, the applicants shall submit a plan for the review and approval of the Executive Director to address the potential visual impacts of the caissons in the event that the caissons are exposed and visible from Pacific Coast Highway as a result of earth movement or other circumstances. The applicants shall agree in writing to carry out the approved plan, which shall include:

A. Coloring the exposed concrete caissons so that they will match the surrounding soils. The caissons and retaining walls should be colored in such a way that the result would be a natural, mottled appearance. If any caissons

are exposed, the applicants shall immediately dye or conceal such foundations.

B. Installation of a low “breakaway” skirt wall to cover exposed earth and/or pilings.

The permittees shall undertake development in accordance with the final approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plan shall occur without a Coastal Commission approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is legally required for any proposed minor deviations.”

### 3c. Response to Staff Comments Regarding Transportation Access, Circulation and Parking

Staff states “[i]t is unclear whether parking, as currently proposed, would adequately serve the new development and resultant parking demand. Information regarding the proposed number of off-street parking spaces for each residence, as well as on-street parking for the Revello Drive extension, was missing in the MND and Appendix H (Traffic Management Plan). Thus, to comply with Section 30252(4) of the Coastal Act, the applicant should provide the number of parking spaces for each of the four residences and how many on-street parking spaces will be available to the public with the road extension, if any.”

The proposed and required off-street parking for each home is as follows:

- (1) 17538, 17544 and 17550 Tramonto Drive (aka SHP House 1)  
Proposed Off-Street Parking: 5 spaces  
Required Off-Street Parking: 5 spaces
- (2) 17532, 17540 and 17548 Revello Drive (aka SHP House 2)  
Proposed Off-Street Parking: 4 spaces  
Required Off-Street Parking: 4 spaces
- (3) 17523 and 17529 Revello Drive (aka JDR House 1)  
Proposed Off-Street Parking: 3 spaces  
Required Off-Street Parking: 3 spaces
- (4) 17533, 17537, 17541 and 17547 Revello Drive (aka JDR House 2)  
Proposed Off-Street Parking: 5 spaces  
Required Off-Street Parking: 5 spaces

Tramonto Drive has an improved roadway width of approximately 35 feet to the east and west of the proposed Tramonto home. On-street parking is permitted on the south side of the street adjacent to the three Tramonto lots.

Revello Drive has (or will have) an improved roadway width of approximately 20 feet fronting the proposed Revello homes. On-street parking is permitted on one side of the street unless street signs prohibit otherwise, such as on red-flag days or along red curbs.

### 3d. Response to Staff Comments Regarding Tribal Cultural Resources

Staff states "The CHRIS records search yielded three "prehistoric" resources within at most 0.46 miles of the project site, with one deposit in particular being 0.18 miles to the northeast of the site....This finding suggests that there is a high likelihood that tribal cultural resources could be found on site. The applicant has not conducted their own investigation and relies on 31 previous cultural resource studies in the vicinity instead. No previous investigation is known to have been conducted on the project site itself. It is important to further specify in the case documents the excavation methods proposed, given that substantial ground disturbance is anticipated for this potentially sensitive site."

Planning did not require or ask Applicant to perform an investigation, nor did Applicant's archeological consultant (Dudek) believe an investigation was warranted for the reasons explained below. A description of the three prehistoric records identified in the Cultural Resources Report are as follows:

- (1) P-19-000134 is a prehistoric site originally formally recorded in 1950 by Eberhart who described the site as a village site containing projectile points, chipped stone tools, midden, and groundstone. Eberhart noted that in the fall of 1953, the site was removed during construction and no part of the site remains. P-19-000134 was also formally recorded by Nelson who described the site as a "refuse heap" possibly extending to a depth of two feet in some places. Nelson also stated that no artifacts were found.
- (2) P-19-000219 is a prehistoric site originally formally recorded in 1950 by Eberhart who described the site as a village site containing projectile points, chipped stone tools, midden, and groundstone. Eberhart noted that in the fall of 1953, the site was removed during construction and no part of the site remains. Applicant's consultants believe P-19-000134 and P-19-000219 are the same site given the Eberhart site records are identical and previously designated as LA-60.
- (3) P-19-100497 is a prehistoric site originally formally recorded in 2004 by Mealey who described the site as redeposited shell midden that was brought in as fill from various locations. The site was redeposited sometime during the late 1960's and early 1970's and extends to a depth of 25 to 35 feet in some places. The resources did not originate from the site but were transported there via grading and fill operations.

Thus, Staff's comment that "there is a high likelihood that tribal cultural resources could be found on site" is unsubstantiated and misleading as Applicant's consultant believes there is only one prehistoric site for which no artifacts were found. It is also important to note that whatever resources were found at this one prehistoric site were discovered only two feet from the surface which is highly relevant considering the project site is in an active landslide.

Staff states "Page 121 of the MND states: "the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period. No response was received." It is not clear if the City followed the protocol for tribal consultation laid out in the Commission's policy. It is also not clear what procedures were taken to determine that no affected tribe was interested in consultation. If the City has not done so already, Commission Staff strongly recommends the City reach out to the California Native American Heritage Commission (NAHC) and/or the State Historic Preservation Office (SHPO) to obtain a Sacred Lands File (SLF) for the project site, use multiple communication methods to try to get in touch with Native American groups on the NAHC contact list, and meaningfully engage with such group."

Assembly Bill (AB) 52 requires the lead agency (Planning) to make a good faith effort to promote the involvement of California Native American Tribes in the decision-making process when it comes to identifying and developing mitigation for impacts to resources of importance to their culture.

Applicant has been notified by Planning that the requisite letter was sent USPS certified mail to the tribes on December 1, 2020 and Planning did not receive any request for consultation within the 30-day comment period as stated in the IS-MND. Based on Applicant's discussions with Planning, it is Applicant's understanding that Planning's outreach to the tribes was in full compliance with AB 52. In addition, considering the historic and existing site conditions, it seems unnecessary to perform any further outreach. However, Applicant acknowledges that Staff may also want to try to get in touch with the tribes given the Coastal Commission's newly adopted tribal consultation policy.

Staff also states "[a]s a result of meaningful engagement with such groups and given the likelihood that tribal cultural resources exist onsite, the City may need to recommend or require avoidance of impacts to tribal cultural resources, which can include but are not limited to archeological resources, biological resources, and scenic resources...."

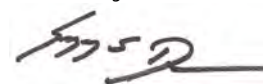
As stated in the IS-MND, the development site was not identified as having any archeological or paleontological resources of value. Furthermore, it is extremely unlikely that any resources would be discovered considering the site is in an active landslide. In approximately 1936 and 1959 the lower and upper portions of the development site failed, respectively. The dotted (not dashed) line on Plate 2r in the geology and soil report referenced in Exhibit 12 shows the hillside topography in 1958 just before the landslide occurred.

As illustrated in Plate 2r, these two geologic events resulted in the top 20 to 30 feet of soil suddenly moving down the slope towards the PCH. The shear force and pressure from the soil movement would have destroyed any tribal or archeological resources that may have once existed on-site. Moreover, these resources would have been significantly displaced to outside the limits of the proposed development. Consequently, it is highly improbable that any proposed excavations will discover any historic or tribal cultural resources.

However, in the unlikely event this occurs, the project has a mitigation measure in the MND that states: "[i]f archaeological and/or tribal cultural resources (i.e., sites, features, or artifacts) are exposed during construction activities for the proposed Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, and/or a tribal cultural resources specialist can evaluate the significance of the find and determine whether additional study is warranted. Depending on the significance of the find under the California Environmental Quality Act (CEQA) (14 California Code of Regulations Section 15064.5(f); California Public Resources Code (PRC) Section 21082), the archaeologist and/or tribal cultural resources specialist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work such as preparation of an archaeological treatment plan and data recovery may be warranted."

I thank you for your time and careful review.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Demos", with a horizontal line extending to the right.

Gregory S. Demos  
President, Demos Development

Download Link for Exhibits:

<https://app.box.com/s/ayx48r0ns5pnjhbzxbfaassqtma1f4xj>



Exhibit 15  
Dudek Memo  
Regarding ESHA

## MEMORANDUM

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**To:** Greg Demos, Springhouse Hamilton Park, LLC  
**From:** Michael Cady, Ryan Henry, Dudek  
**Subject:** Investigation of Potential ESHA at the Revello-Tramonto Project  
**Date:** March 25, 2022  
**cc:** Tony Russo, Crest Real Estate  
**Attachment(s):** A. Figures

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This technical memorandum summarizes previous relevant biological resource investigations to inform potential Environmentally Sensitive Habitat Area (ESHA) designation at the Revello-Tramonto Project (Project). The Project is located in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County, California (Attachment A, Figure 1). Previous biological resource surveys consisted of vegetation community mapping, seasonally appropriate floristic surveys for special status plants, and assessment of Sensitive Natural Communities and 1-parameter wetlands, which are thoroughly discussed in a previous prepared Biological Resources Letter Report.<sup>1</sup>

This investigation of biotic conditions and historic disturbance onsite was conducted to inform determination of potential ESHA. A description of native/naturalized vegetation communities, landforms, soil substrates, and previous anthropogenic disturbance are discussed in this memorandum to supplement previous botanical studies and help determine whether these areas qualify or do not qualify as ESHA.

### 1 Project Summary

The Project involves the construction of four new single-family residences. A 9,051 square-foot residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive. A 4,160 square-foot residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive. A 2,619 square-foot residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive. Lastly, a 6,078 square-foot residence (with an additional 7,949 square-foot basement) would be located at 17531, 17533, 17537, 17541 Revello Drive.

There will be two primary staging and parking areas during construction. The staging/parking area for SHP House 1 will be on-site within parcels located at 17538, 17544, and 17550 Tramonto Drive behind the building footprint. This staging area will be a large flat pad that is approximately 60 feet wide by 160 feet long. The staging/parking area for the three homes on Revello (i.e. SHP House 2 and JDR Houses 1 and 2) will be located west of the current terminus of Revello Drive between JDR House 2 and SHP House 2. This staging/parking area will be a relatively flat

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<sup>1</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

pad that is approximately 36 feet wide by 180 feet long. Construction is planned to start in the middle of 2022 and estimated to conclude approximately 36 months from the start of construction.

## 2 Regulatory Setting

### 2.1 Environmentally Sensitive Habitat Areas

ESHAs are defined by the California Coastal Commission (CCC) as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments. (Pub. Resources Code, § 30107.5). This broad definition includes habitat for special-status species and other areas that provide important ecosystem functions. The designation of an ESHA generally includes vegetation alliances listed as Sensitive Natural Communities with an S1 to-S3 ranking. The Coastal Commission and local counties or municipalities associated with the Local Coastal Program (LCP) are the jurisdictional agencies that exert authority in identifying and protecting ESHA in the course of project activities.

The CCC issued guidance in 2013 to assist with determining ESHAs.<sup>2</sup> Two basic conditions must be met for an ESHA designation:

- 1) There are rare species or habitat in the subject area;
- 2) There are especially valuable species or habitat in the area, which is determined based on:
  - a. whether any species or habitat that is present has a special nature, OR
  - b. whether any species or habitat that is present has a special role in the ecosystem

When the CCC has found that either of these two conditions is met, it has assessed whether the habitat or species meeting these conditions is easily disturbed or degraded by human activities and developments. If they are, the CCC has found the area to be ESHA. It should be noted that even disturbed or degraded habitats may constitute an ESHA depending on the level of disturbance. The CCC guidance from 2013 also advises to “consider using the following resources in order to assess whether an area should be considered an ESHA:

- 1) The list of rare, threatened or endangered species prepared under the California or Federal Endangered Species Act
- 2) The list of “fully protected species” or “species of special concern” by the California Department of Fish and Wildlife
- 3) The list of “1b” species prepared by the California Native Plant Society.
- 4) The CDFW List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database

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<sup>2</sup> California Coastal Commission 2013. LCP Update Guide, Section 4. Environmentally Sensitive Habitats and Other Natural Resources. San Francisco, CA. July 31, 2013.

This technical memorandum evaluates habitat based on the above listed considerations from the CCC 2013 guidance, including (1) the presence of rare species and habitat, (2) habitat value, and (3) whether the resources are easily disturbed or degraded.

### 3 Methods

Dudek conducted vegetation community and land cover mapping in November 2019 throughout a 32.29-acre study area (i.e., 1.33-acre project site and 30.96-acre study area outside of the project site) using *A Manual of California Vegetation, Second Edition* (MCV2) and the online edition (MCV Online) with modifications to accommodate the lack of conformity.<sup>3,4</sup> Vegetation mapping was conducted in accordance with CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* and CNPS *Guideline for Mapping Rare Vegetation*.<sup>5,6</sup> As such, vegetation communities were classified following CDFW List of California Terrestrial Natural Communities, which is based off of MCV2 and the MCV online edition.<sup>7</sup> Vegetation communities and land covers were mapped in the field directly onto a 150-scale (1 inch = 150 feet) color digital aerial map of the property.

In February 2021, Dudek conducted a subsequent assessment of vegetation communities in the study area in order to demonstrate disturbed site conditions, high prevalence of non-native species, and to refine boundaries of earlier vegetation mapping efforts. The assessment was conducted following the most recent *CDFW-CNPS Protocol for the Combined Vegetation Rapid Assessment and Relevé Field Form* from 2019.<sup>8</sup> This method is a “semi-quantitative” method, relying on ocular (visual) estimates of plant cover rather than on counts of “hits” of a particular species along a transect line or other precise measurement techniques. The rapid assessment was based on an estimated representative area of the stand. Visual estimates were made from a base point established from within the stand. Notable collected data relevant to determining the vegetation community type and condition include soil textures; surface cover of abiotic and biotic substrates (i.e., surface water, litter, bedrock, boulder, stone, cobble, gravel, and fines); disturbance types and qualitative intensity evaluations; overall cover of vegetation by non-vascular cover, total vascular cover, and cover by vegetative layers (i.e., conifer tree/hardwood tree, regenerating tree, shrub, herbaceous); as well as a species list and each species’ coverage.

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<sup>3</sup> Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens. 2009. *A Manual of California Vegetation*, Online Edition. California Native Plant Society, Sacramento, CA. <http://vegetation.cnps.org/>

<sup>4</sup> California Native Plant Society. 2021. *A Manual of California Vegetation*, Online Edition. California Native Plant Society, Sacramento, California. Accessed January 2021. <https://vegetation.cnps.org/>.

<sup>5</sup> California Department of Fish and Wildlife. 2018. “Protocols for Surveying and Evaluating Impacts to Special Status Native Populations and Natural Communities.” March 20, 2018. Accessed July 2020. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>.

<sup>6</sup> California Native Plant Society. 2011. *Guidelines for Mapping Rare Vegetation*. CNPS, January 2011. [https://www.cnps.org/wp-content/uploads/2018/03/guidelines-rare\\_veg\\_mapping.pdf](https://www.cnps.org/wp-content/uploads/2018/03/guidelines-rare_veg_mapping.pdf).

<sup>7</sup> California Department of Fish and Wildlife. 2020b. *Natural Communities List*. Accessed July 2020. <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>.

<sup>8</sup> California Department of Fish and Wildlife and California Native Plant Society. 2019. “CDFW-CNPS Protocol for the Combined Vegetation Rapid Assessment and Relevé Field Form”. February 21, 2019. Accessed February 2021. <https://www.cnps.org/plant-science/field-protocols-guidelines>.

## 4 Results

Five vegetation communities and land cover types were identified within the study area during the biological resource evaluation: disturbed lemonade berry scrub, disturbed quailbush scrub, urban/developed land, ornamental vegetation, and disturbed habitat. Figure 2, Biological Resources, illustrates the distribution and Table 2 summarizes the extent of each vegetation community and land cover type. Descriptions of the naturalized vegetation types mapped in the study area are summarized below from the project's Biological Resources Letter Report.<sup>9</sup>

**Table 1. Vegetation Communities and Land Cover Types in the Study Area**

Vegetation Community/Land Cover	Acreage	
	Within the Project Site Only	Within the Study Area (Project Site plus 500-Foot Buffer)
<b>Native or Naturalized Vegetation Types</b>		
Disturbed Lemonade Berry Scrub	0.49	2.31
Disturbed Quailbush Scrub	0.00	0.32
<i>Subtotal</i>	0.49	2.63
<b>Non-Natural Land Covers</b>		
Urban/Developed	0.02	19.24
Ornamental	0.39	7.29
Disturbed Habitat	0.44	3.14
<i>Subtotal</i>	0.85	29.67
<b>TOTAL<sup>1</sup></b>	<b>1.33</b>	<b>32.29</b>

<sup>1</sup> Total may not sum due to rounding.

### 4.1 Description of Native/Naturalized Vegetation Types

#### 4.1.1 Disturbed Lemonade Berry Scrub

Remnant patches of this vegetation community are found in undeveloped areas of the study area, including the project site, and are mapped as disturbed lemonade berry scrub due to the high cover of non-native species (within the rapid assessment area, 31 percent absolute cover and 39 percent relative cover of vegetation), fragmentation from adjacent stands of ornamental plantings and disturbed areas, presence of a historic landslide that continues to move downhill, and anthropogenic disturbances (e.g., pedestrian trails, trash dumping, and regular mowing). Native species observed in the disturbed lemonade berry scrub within rapid assessment area include lemonade berry, ashy buckwheat, black sage, giant wildrye (*Elymus condensatus*), California brittle bush, California sagebrush, laurel sumac (*Malosma laurina*), coyote brush (*Baccharis pilularis*), deer weed (*Acmispon glaber* var. *glaber*), laurel sumac, and nodding needlegrass (*Stipa cernua*). However, non-native species observed in this vegetation community at approximately 39 percent relative cover include American century plant (*Agave americana*), jade

<sup>9</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

plant (*Crassula ovata*), castorbean (*Ricinus communis*), Barbary fig (*Opuntia ficus-indica*), hottentot fig (*Carpobrotus edulis*), leafy spurge (*Euphorbia virgata*), Uruguayan pampas grass (*Cortaderia selloana*), red brome (*Bromus rubens*), burclover (*Medicago polymorpha*), and tree tobacco (*Nicotiana glauca*).

Lemonade berry scrub within the project-site is minimal at approximately 0.49-acre; whereas it is found with more concentrated distribution and broader variation of associations of this alliance further north in the Santa Monica Mountains National Recreational Area compared with other areas of coastal southern California.<sup>10,11</sup>

Lemonade berry scrub alliance has a rank of G3S3<sup>12</sup>, which means it is vulnerable (i.e., at moderate risk due to a limited range, relatively few populations or occurrences, or recent and widespread declines or threats) globally and sub nationally. This vegetation community is considered sensitive by local, state, and/or federal agencies. The lemonade berry scrub mapped within the project site and study area would be considered low quality, as it is highly disturbed and isolated (surrounded by disturbed habitat and ornamental landscaping) with a high cover of non-native species.

#### 4.1.2 Disturbed Quailbush Scrub

A remnant patch of this vegetation community is located in the southern portion of the study area, along the northern side of the PCH. Species observed in the disturbed quailbush scrub within the study area include native California sagebrush, California brittle bush, and laurel sumac, and non-native castorbean, coyote brush, hottentot fig, purple pampas grass, and tree tobacco.

This vegetation community is mapped as disturbed quailbush scrub in the study area due to the high cover of non-native species and anthropogenic disturbances (e.g., pedestrian trails, mechanical perturbation) and high cover of non-native species. Quailbush scrub alliance has a rank of G4S4, which means it is apparently secure (i.e., uncommon but not rare, with some cause for long-term concern due to declines or other factors) globally and sub nationally. This vegetation community is not considered sensitive by local, state, and/or federal agencies.

### 4.2 Determination of Environmentally Sensitive Habitat Areas

The purpose of this investigation was to evaluate factors that inform designations of ESHA by the Coastal Commission, Coastal Act and LCP, including the presence of rare species and communities, habitat value, and potential for further degradation. The project site is zoned for single-family dwellings with the general plan use designated as low density residential.<sup>13</sup> The site is surrounded by single-family residences with small-sized lots primarily dominated by planted landscaping. Although some natural areas still occur along the steep hillsides, these areas include a high cover of non-native plant species, have been previously disturbed as a result of a historic landslide, and are patchy due to anthropogenic disturbance such as mechanical perturbation, high foot traffic, trash

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<sup>10</sup> AIS (Aerial Information Systems). 2007. USGS-NPS Vegetation Mapping Program, Santa Monica Mountains National Recreational Area, Photo Interpretation Report. May 23, 2007. Aerial Information Systems, Inc. Prepared for Santa Monica Mountains National Recreation Area. <https://nrm.dfg.ca.gov/documents/ContextDocs.aspx?cat=VegCAMP>.

<sup>11</sup> Stoms, D. M., P. A. Jantz, and F. W. Davis. 2012. Natural resource condition assessment: Santa Monica Mountains National Recreation Area. Natural Resource Report NPS/SAMO/NRR-2013/715. National Park Service, Fort Collins, Colorado. <https://irma.nps.gov/DataStore/DownloadFile/484097>.

<sup>12</sup> NatureServe Global (G) and State (S) rarity ranks per Faber-Langendoen et al. (2012). Natural communities with global or state ranks of 1–3 are considered sensitive natural communities by CDFW (2020b) and are to be addressed in the environmental review processes of CEQA

<sup>13</sup> City of Los Angeles. 2019. Zimas. Web Map Application. Accessed November 2019. <http://zimas.lacity.org/>.

dumping, and erosion. Additionally, soils within the project site that were mapped as Urban land-Xerorthents, landscaped complex, 0 to 5 percent slopes were confirmed during field investigations.<sup>14</sup> These soils are comprised of colluvium and residuum derived from sedimentary rock and other mixed sources, are well drained, and support ornamental plants and lawns.

Table 2 summarizes the ESHA criteria and evaluation factors used for this assessment.

**Table 2. Summary of ESHA Criteria as Applied to the Project Site**

ESHA Criteria	Evaluation Factors
Rare species or habitat in the subject area	No CNPS-listed rare plants are present on the project site. However, approximately 0.49 acres of disturbed lemonade berry scrub is present in the subject area. Native stands of lemonade berry scrub are considered a Sensitive Vegetation Community by the CDFW.
Valuable species or habitat in the area because of their special nature or role in an ecosystem	Resources onsite are considered lower value habitat because they have been fragmented, invaded, and anthropogenically disturbed over the last 30 plus years.
Easily disturbed or degraded by human activities and developments	The lemonade berry scrub on the project site has been highly altered by historic landslides, clearing, high foot traffic, trash dumping, erosion, and invasive species. Remaining individual native shrubs are fragmented. Habitat onsite does not consist of a relatively intact or pristine landscape that would be easily disturbed or degraded beyond its current condition.

No special-status plants were observed or are expected to occur within the project site. No special-status wildlife species were detected within the project site. The project site contains isolated, disturbed native vegetation, and is dominated by residential development and ornamental vegetation, which provides low-quality, limited suitable habitat to support special-status wildlife species. Thus, with the exception of the western mastiff bat (a CDFW species of special concern and locally recognized sensitive species) that has the potential to occasionally forage within the project site, special-status wildlife species have a low or no potential to occur on site. Project construction is proposed to occur primarily during daylight hours; thus, foraging bats are not anticipated to be impacted by the proposed project activities.

In conclusion, although lemonade berry scrub occurs onsite, the habitat has been highly altered and degraded by human disturbance and invasive species. Based on the current highly degraded status, the project site would not be suitably characterized as a relatively intact or pristine habitat that would be easily disturbed or degraded beyond its current condition. As a result, the 0.49 acre of disturbed lemonade berry scrub does not meet the criteria to be designated as an ESHA.

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<sup>14</sup> U.S. Department of Agriculture Natural Resources Conservation Service. 2006. Soil Survey of Santa Monica Mountains National Recreation Area, California. Accessed November 2019. [http://soils.usda.gov/survey/printed\\_surveys/](http://soils.usda.gov/survey/printed_surveys/).



# Attachment A

## Figures

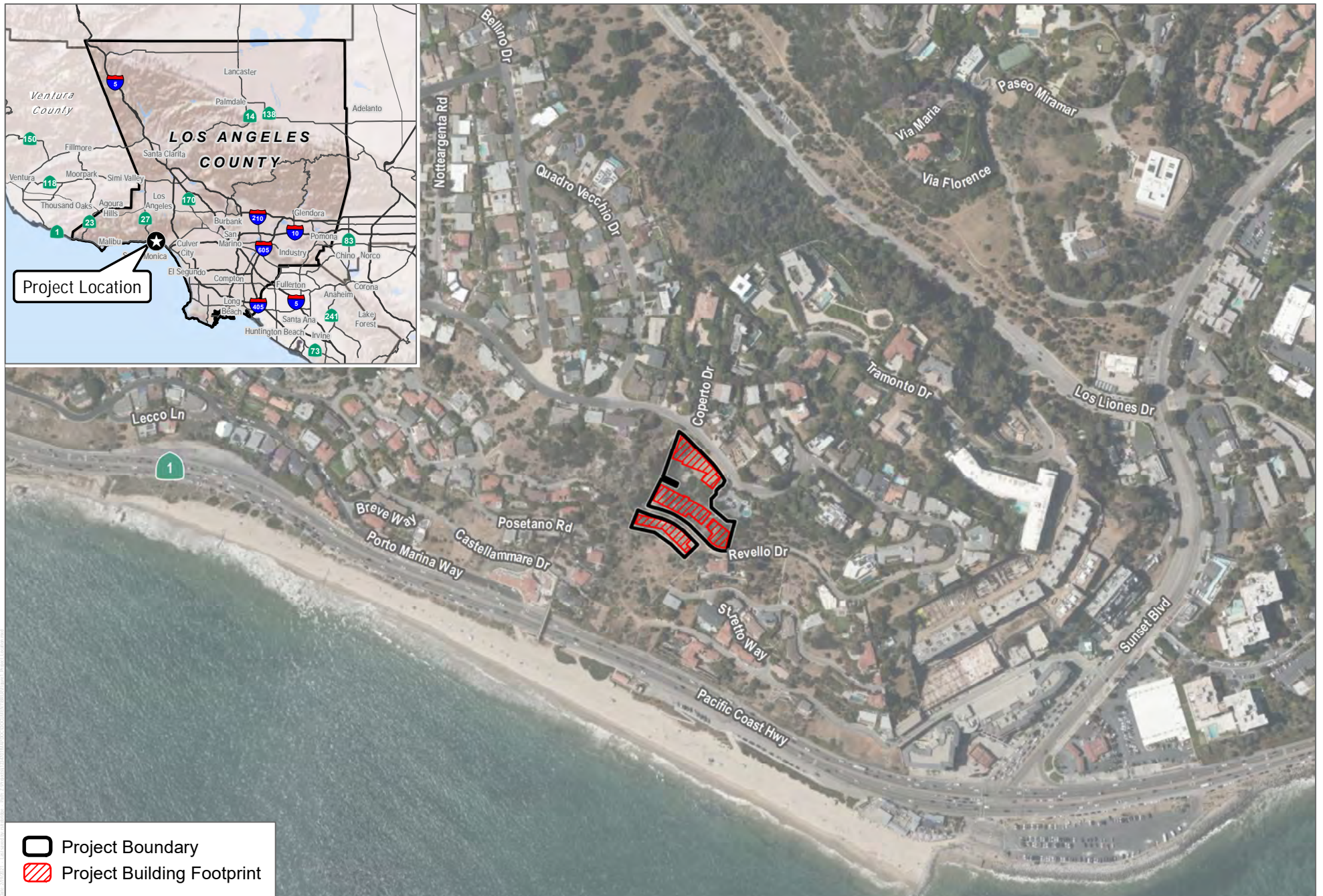


FIGURE 1  
Project Location

Revello Drive and Tramonto Drive Residential Project





FIGURE 2

## Biological Resources

Revello Drive and Tramonto Drive Residential Project



## MEMORANDUM

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**To:** Springhouse Hamilton Park, LLC | JDR Revello LLC  
**From:** Michael Cady | Senior Biologist  
**Subject:** Analysis of Proposed Locations for Lemonade Berry Plantings  
**Date:** May 31, 2022  
**cc:** Tony Russo | Crest Real Estate – Director, Discretionary Entitlements Division  
**Attachment:** A. Preliminary Landscaping Plan; B. Vegetation Communities and Proposed Planting Corridors

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This memorandum provides the ecological content for the proposed planting of lemonade berry (*Rhus integrifolia*) at the Revello-Tramonto Project (Project). The Project is in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County, California. Previous biological resource surveys conducted by Dudek consisted of vegetation community mapping, seasonally appropriate floristic surveys for special status plants, and assessment of Sensitive Natural Communities and 1-parameter wetlands, which are thoroughly discussed in a previous prepared Biological Resources Letter Report.<sup>1</sup> Additionally, Dudek prepared an Investigation of Potential Environmentally Sensitive Habitat Area (ESHA) for the Project.<sup>2</sup>

### Project Summary

The Project involves the construction of four new single-family residences. A 9,051 square-foot residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive. A 4,160 square-foot residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive. A 2,619 square-foot residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive. Lastly, a 6,078 square-foot residence (with an additional 7,949 square-foot basement) would be located at 17531, 17533, 17537, 17541 Revello Drive.

### Preliminary Landscaping Plan

The Project's Preliminary Landscaping Plan (Attachment A) indicates where lemonade berry is proposed to be planted for each of the four new single-family residences. For the 17550 Tramonto Drive, the lemonade berry is proposed to be planted along the eastern portion in what is currently mapped as disturbed habitat and ornamental vegetation (Attachment B). For 17533 W Revello Drive, the lemonade berry is proposed to be planted along the northern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B). For 17523 W Revello Drive, the lemonade berry is proposed to be planted along the northern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B).

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<sup>1</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

<sup>2</sup> Dudek. 2022. Investigation of Potential ESHA at the Revello-Tramonto Project. March 25, 2022.

For 17532 W Revello Drive, the lemonade berry is proposed to be planted along the southern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B).

It is important to note the approved geology and soil report for the Project recommends the entire development site be as impermeable as much as possible to mitigate the infiltration of water into the area where a landslide previously occurred. As such, the proposed planting areas for the lemonade berry scrub are limited to sloped terrain, where impermeable surfaces are not feasible. Specifically, the report states:

"The site engineers and designers should be aware that the site is geotechnically unsuitable for the local discharge of onsite storm water due to the sloping conditions and the high likelihood that discharged water would adversely saturate the soils and landslide materials. It is recommended that the area be impermeable as much as possible such that rain water captured on site will be directed/draind into the storm water system and does not infiltrate into the ground."

## Analysis

Remnant patches of this vegetation community are found in undeveloped areas of the study area, including the project site, and are mapped as disturbed lemonade berry scrub due to the high cover of non-native species (within the rapid assessment area, 31 percent absolute cover and 39 percent relative cover of vegetation), fragmentation from adjacent stands of ornamental plantings and disturbed areas, presence of a historic landslide that continues to move downhill, and anthropogenic disturbances (e.g., pedestrian trails, trash dumping, and regular mowing). While the existing lemonade berry onsite and in the adjacent parcels is not pristine, planting lemonade berry in the northern portions of 17533 W Revello Drive and 17523 W Revello Drive would provide a continuous connection to lemonade berry scrub to the east and west of these locations. It would be expected that native and non-native plant species in the adjacent area would naturally spread into the landscape portions of the site. As the planted and volunteer shrubs mature, it is expected that common urban-adapted, terrestrial wildlife (such as Virginia opossum, Audubon's cottontail, California ground squirrel, deer mouse, and raccoon) could use the connected habitat for local movement and it would provide refugia from predators (e.g., raptors, owls, and coyote).

## Conclusion

The proposed replanting lemonade berry scrub areas are in favorable locations, especially on 17523 and 17533 Revello Drive, based on the following reasons:

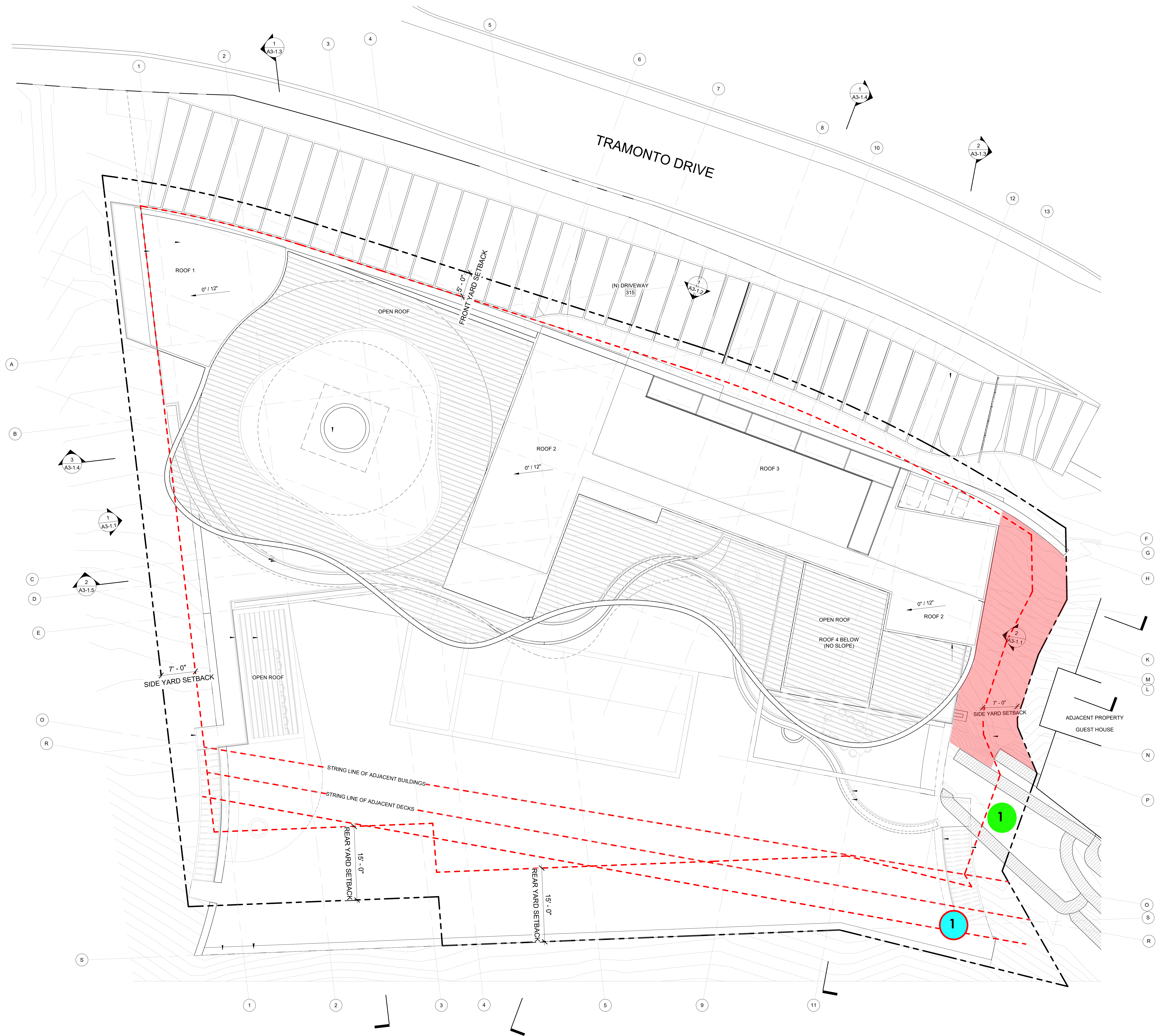
- (1) occur within existing lemonade berry scrub areas;
- (2) create connectivity between existing lemonade berry scrub areas to the east and west of the project; and
- (3) may help preserve and create lemonade berry scrub in this area by creating a corridor that could continue to be extended and maintained with consistent regulatory oversight of future development in the adjacent parcels, as depicted in Attachment B.



# **Attachment A**

## Preliminary Landscaping Plan





## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

## SUMMARY OF REPLACEMENT TREES

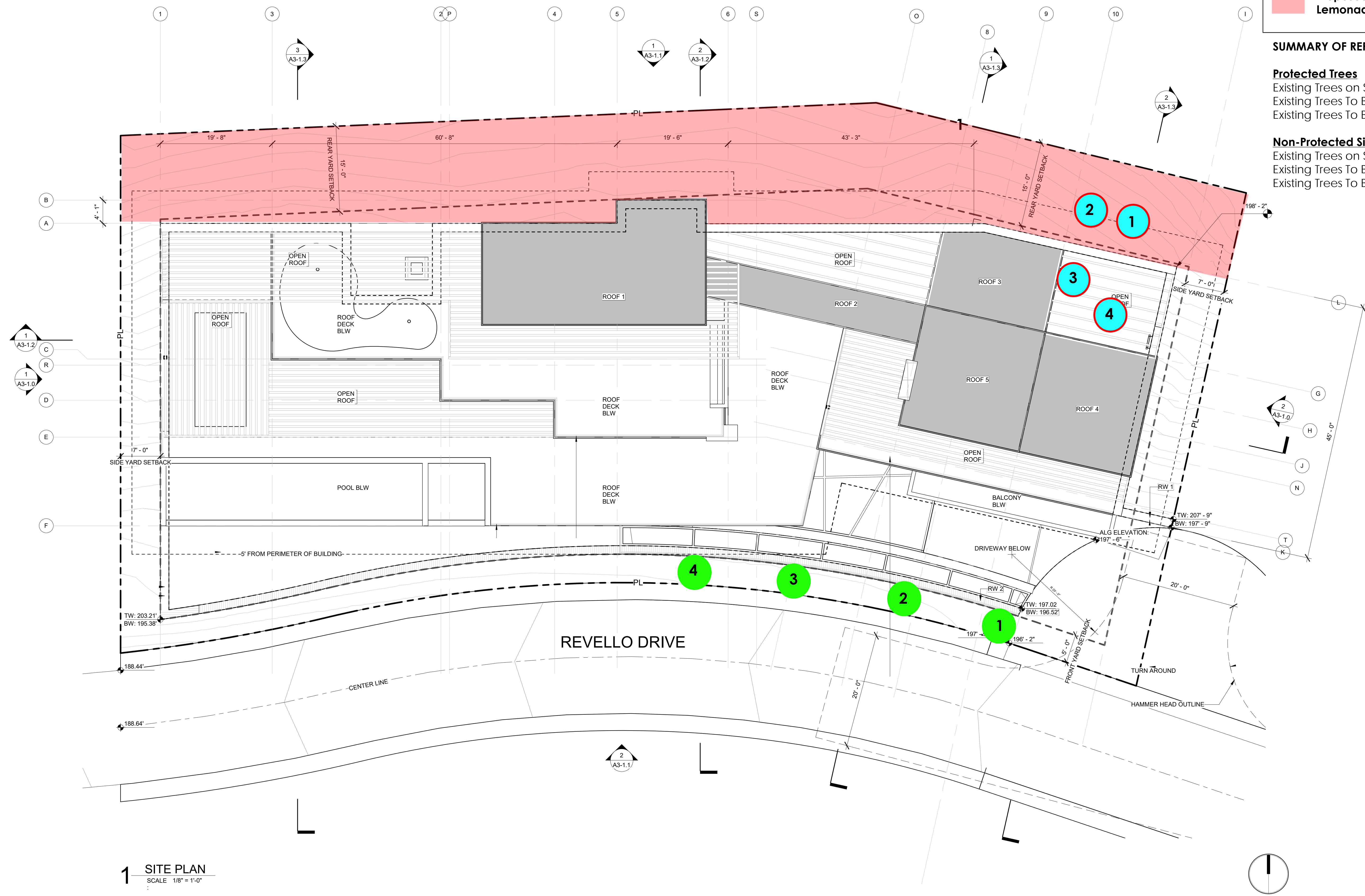
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Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

### Non-Protected Significant Trees

Existing Trees on Site: 1  
Existing Trees To Be Removed: 1  
Existing Trees To Be Replaced: 1





**KEY**

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

**SUMMARY OF REPLACMENT TREES**

**Protected Trees**  
Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

**Non-Protected Significant Trees**  
Existing Trees on Site: 4  
Existing Trees To Be Removed: 4  
Existing Trees To Be Replaced: 4

**1 SITE PLAN**  
SCALE: 1/8" = 1'-0"

17533 W REVELLO DRIVE  
LOS ANGELES, CA 90272

PRELIMINARY LANDSCAPE PLAN

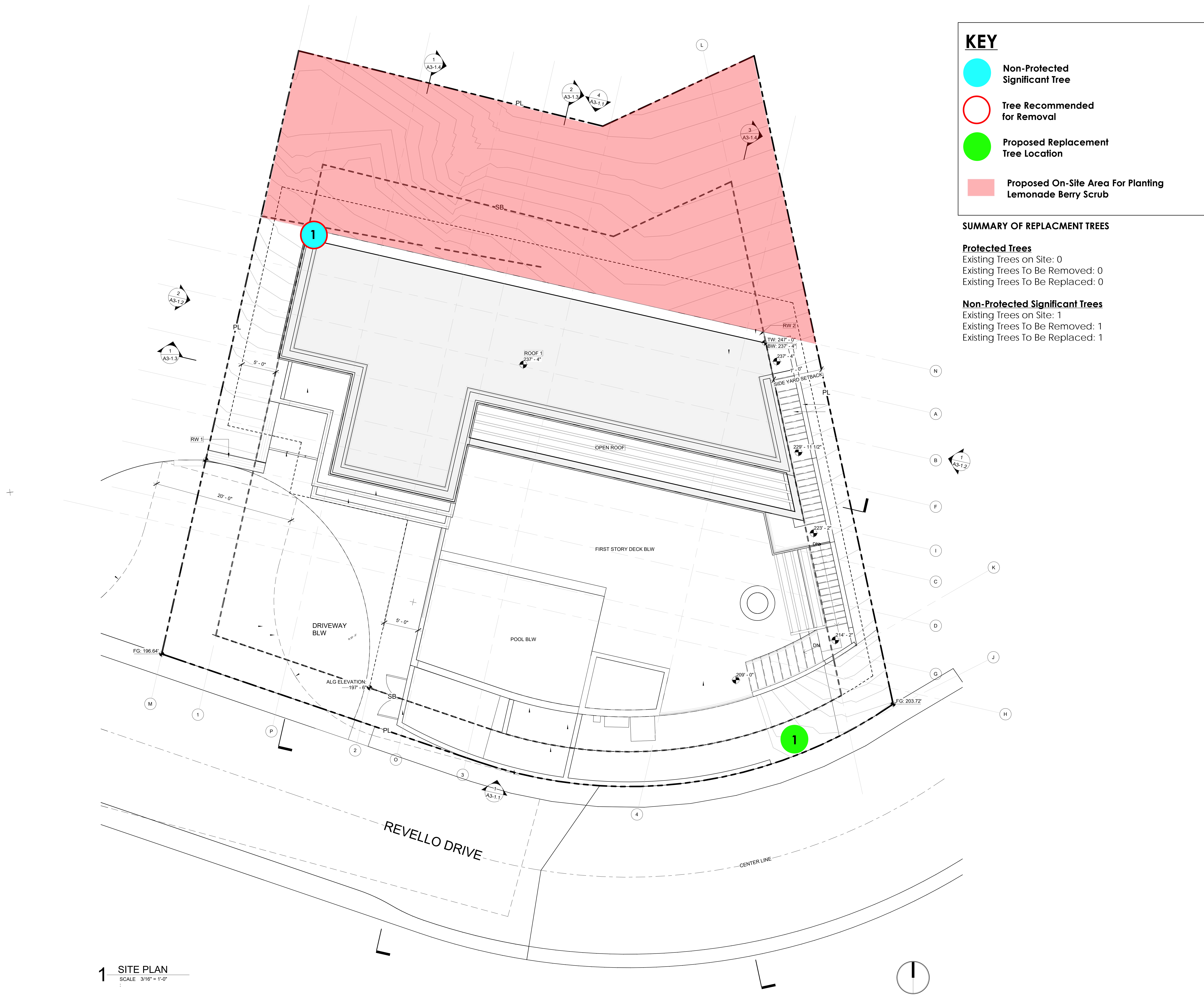
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04/21/2022

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IN-PROGRESS

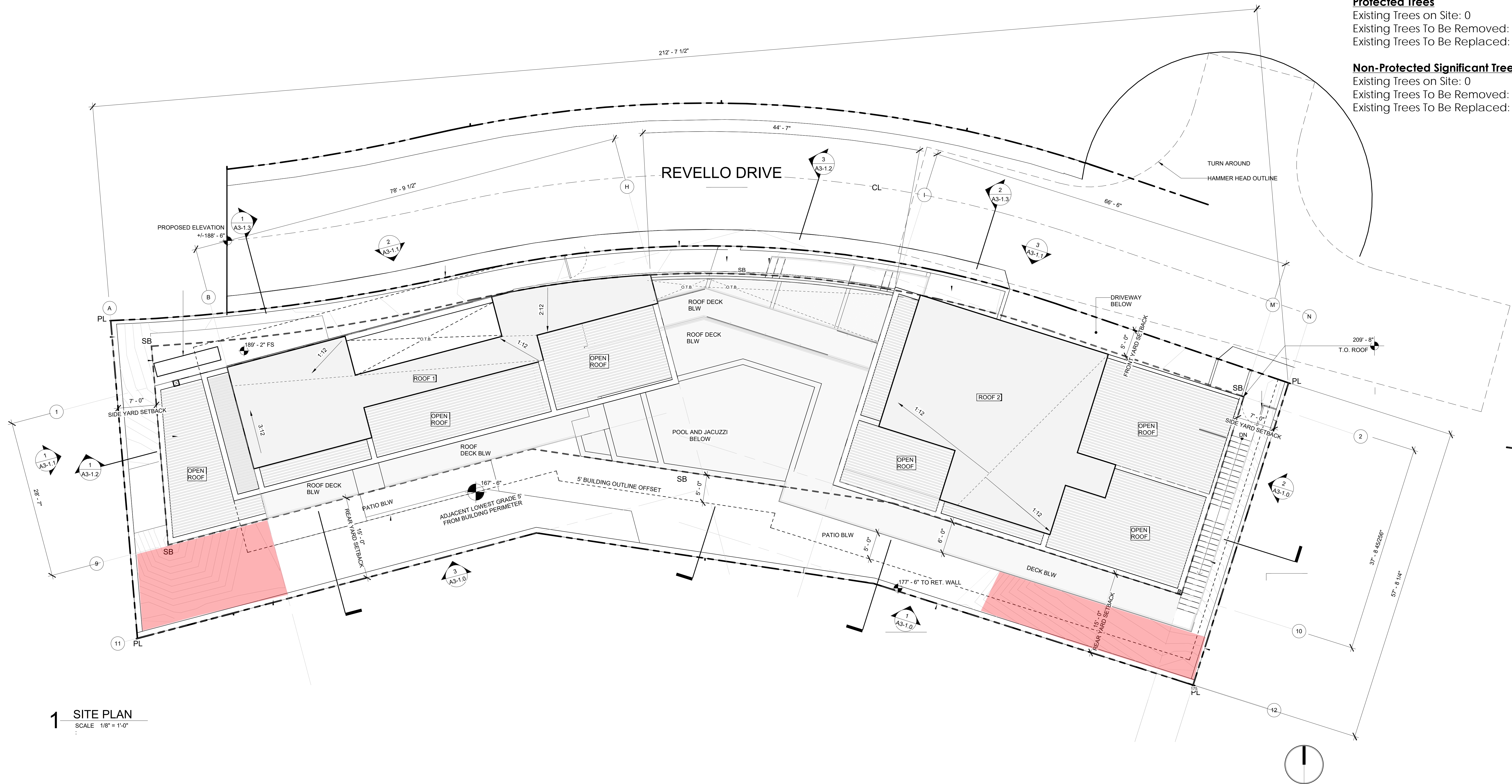
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DRAWN BY:  
CHECKED BY:  
SCALE: 1/8" = 1'-0"  
SHEET NO:

**L1**









1 SITE PLAN  
SCALE 1/8" = 1'-0"

## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

### SUMMARY OF REPLACEMENT TREES

#### Protected Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

#### Non-Protected Significant Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0



# **Attachment B**

## Vegetation Communities and Proposed Planting Corridors



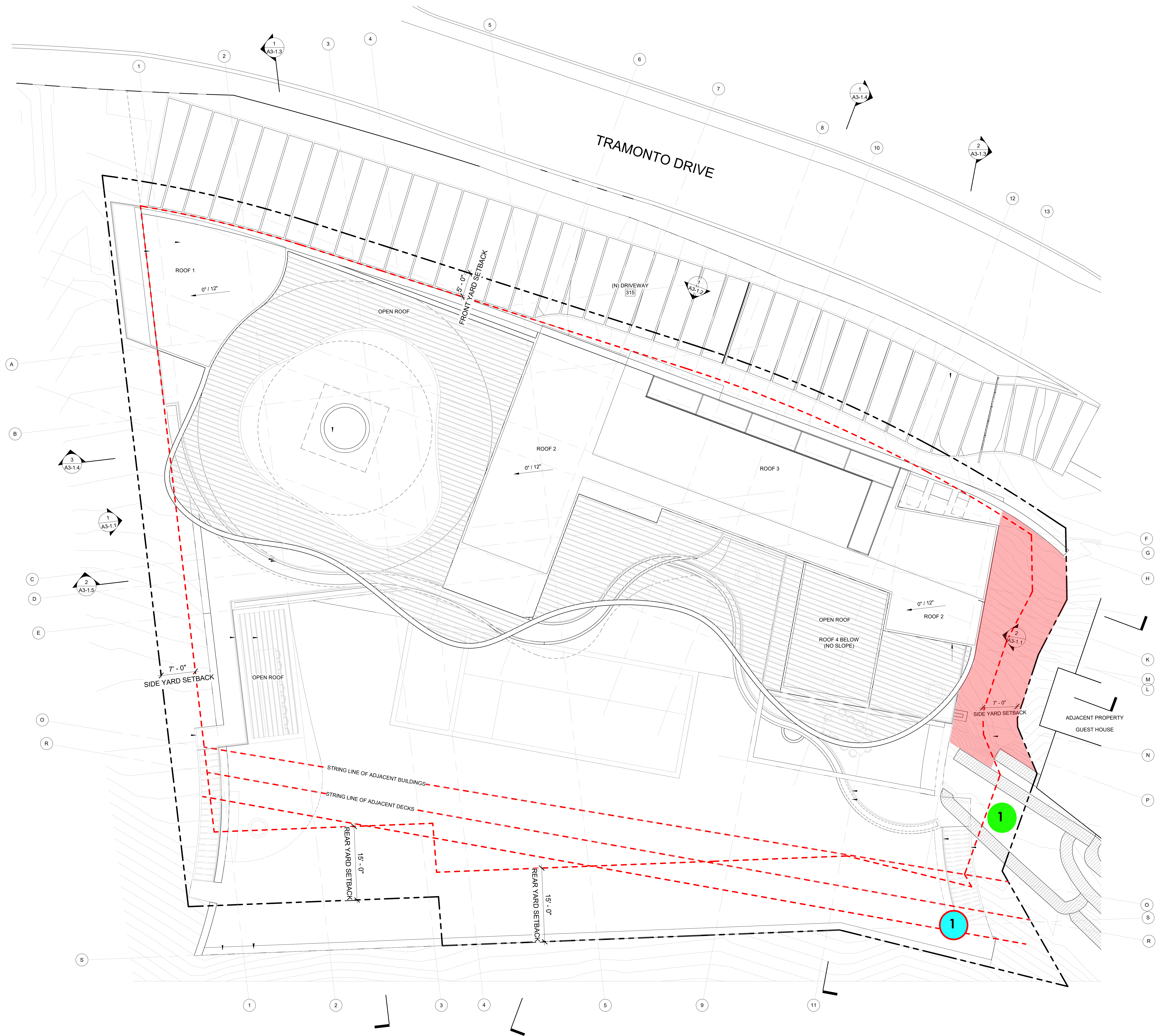


- Study Area (500-Foot Buffer)
- Project Boundary
- County Parcel Boundary
- Vegetation Communities and Land Cover
- DEV, Urban/Developed
- DH, Disturbed Habitat
- ORN, Ornamental Vegetation
- dAtrlen, Disturbed Quailbush scrub (*Atriplex lentiformis*) Alliance
- dRhuint, Disturbed Lemonade berry scrub (*Rhus integrifolia*) Alliance
- Project Impacts**
- Permanent
- dRhuint, Disturbed Lemonade berry scrub Removed in November 2020 (3,530.5 SF)
- dRhuint, Disturbed Lemonade berry scrub To Be Removed (20,912.04 SF)
- Proposed Lemonade Berry Planting Corridor



SOURCE: Los Angeles County 2011, Bing Maps 2019





## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

## SUMMARY OF REPLACEMENT TREES

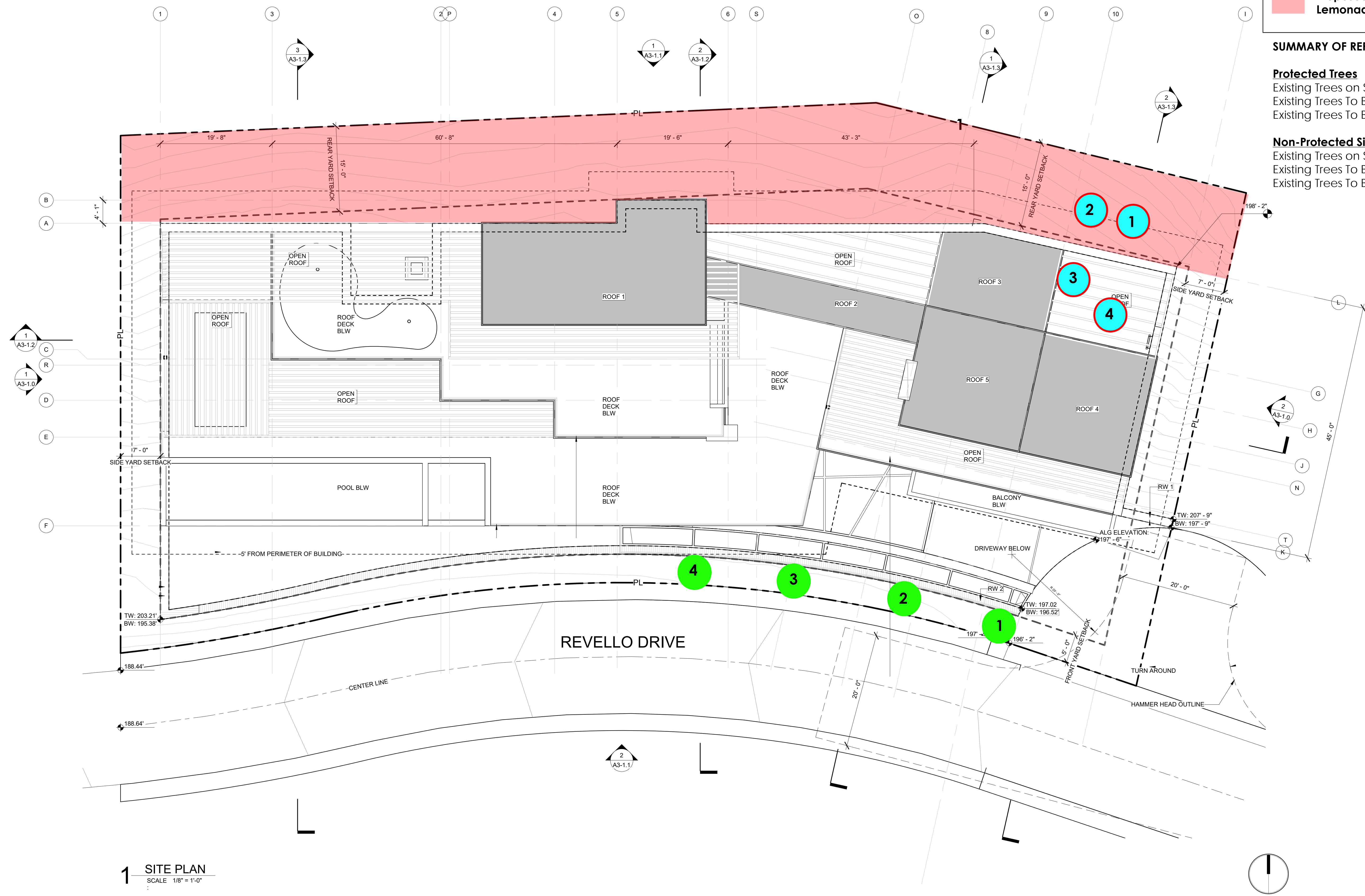
### Protected Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

### Non-Protected Significant Trees

Existing Trees on Site: 1  
Existing Trees To Be Removed: 1  
Existing Trees To Be Replaced: 1





**KEY**

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

**SUMMARY OF REPLACMENT TREES**

**Protected Trees**  
Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

**Non-Protected Significant Trees**  
Existing Trees on Site: 4  
Existing Trees To Be Removed: 4  
Existing Trees To Be Replaced: 4

**1 SITE PLAN**  
SCALE: 1/8" = 1'-0"

17533 W REVELLO DRIVE  
LOS ANGELES, CA 90272

PRELIMINARY LANDSCAPE PLAN

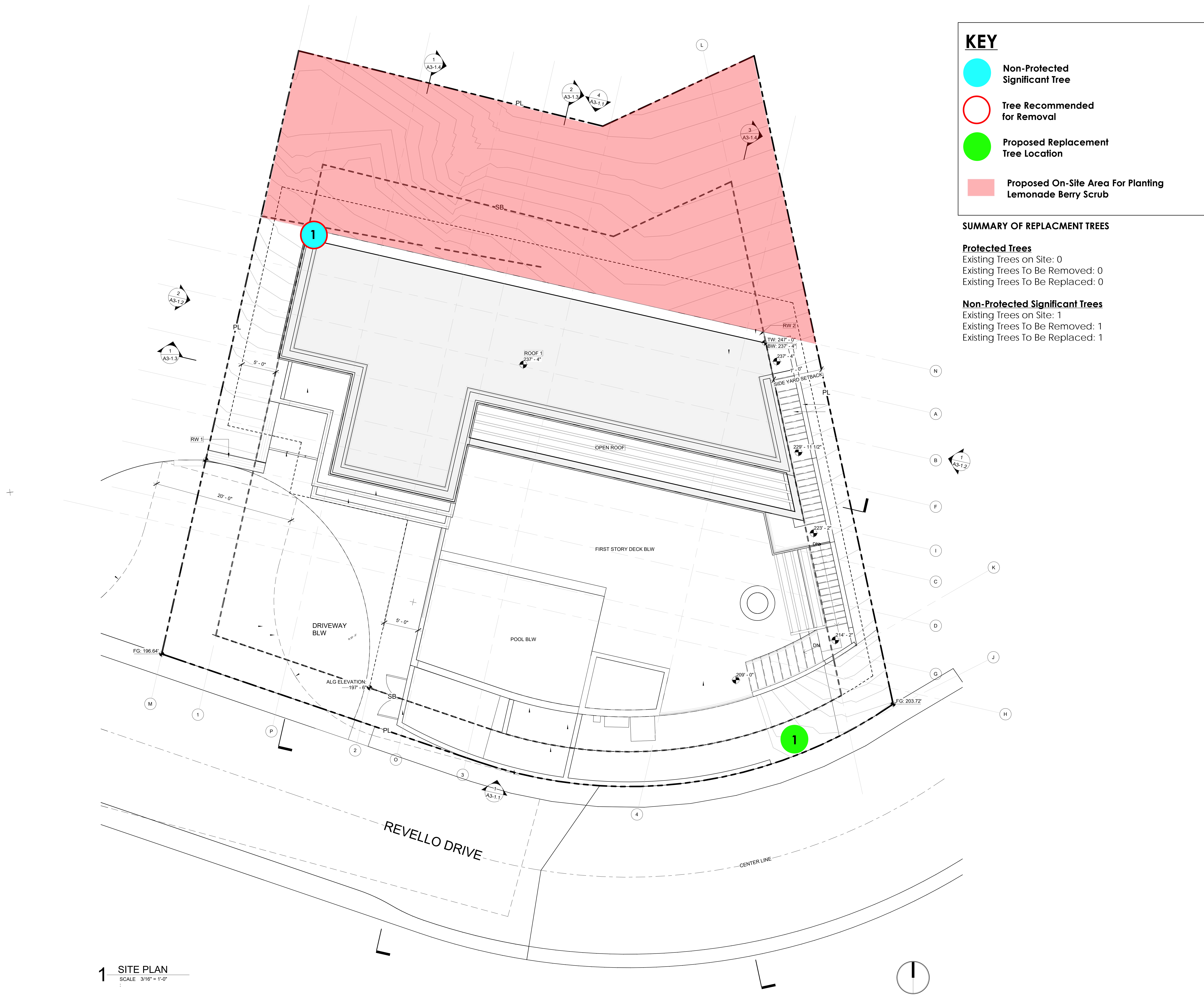
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04/21/2022

PROJECT STATUS:  
IN-PROGRESS

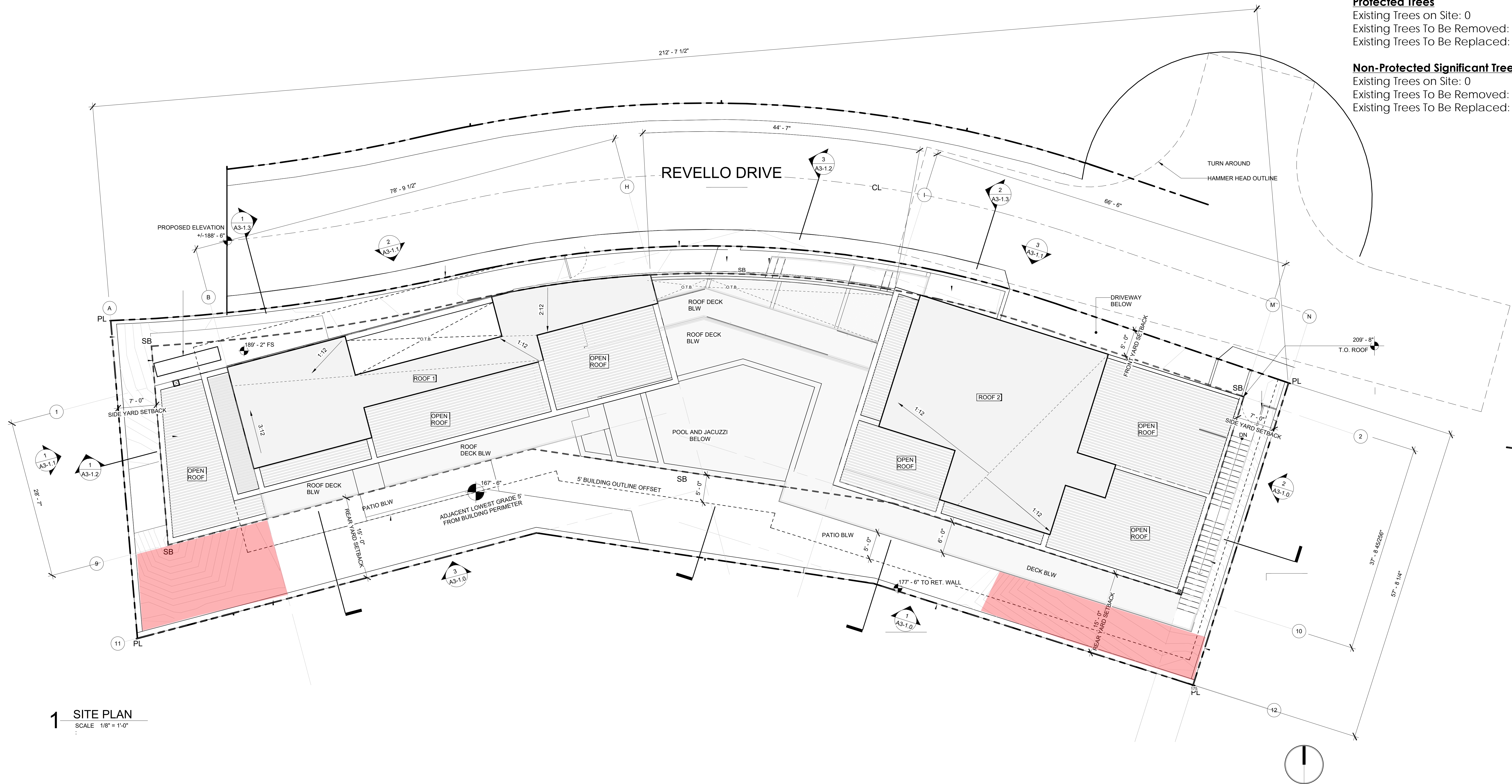
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DRAWN BY:  
CHECKED BY:  
SCALE: 1/8" = 1'-0"  
SHEET NO:

**L1**









1 SITE PLAN  
SCALE 1/8" = 1'-0"

## KEY

- Non-Protected Significant Tree
- Tree Recommended for Removal
- Proposed Replacement Tree Location
- Proposed On-Site Area For Planting Lemonade Berry Scrub

### SUMMARY OF REPLACEMENT TREES

#### Protected Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

#### Non-Protected Significant Trees

Existing Trees on Site: 0  
Existing Trees To Be Removed: 0  
Existing Trees To Be Replaced: 0

## **Errata**

### **C-3**

Erratum No. 1 dated September 23, 2022

Erratum No. 2 dated November 3, 2023

**DEPARTMENT OF  
CITY PLANNING**

COMMISSION OFFICE  
(213) 978-1300

**CITY PLANNING COMMISSION**

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PRESIDENT

CAROLINE CHOE  
VICE-PRESIDENT

HELEN CAMPBELL  
JENNA HORNSTOCK  
HELEN LEUNG

YVETTE LOPEZ-LEDESMA  
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RENEE DAKE WILSON

**CITY OF LOS ANGELES  
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SHANA M.M. BONSTIN  
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP  
DEPUTY DIRECTOR

LISA M. WEBBER, AICP  
DEPUTY DIRECTOR

**September 23, 2022**

**Owners/Applicants**

Springhouse Hamilton Park LLC  
4675 MacArthur Court  
Newport Beach, CA 92660

Demos Development  
661 North Harper Avenue  
Los Angeles, CA 90048

**Representative**

Greg Demos  
Demos Development  
661 North Harper Avenue  
Los Angeles, CA 90048

**RE: ENV-2019-5520-MND ERRATA  
17538-17550 Tramonto Drive; 17532-17548 Revello Drive; 17523-17529 Revello  
Drive; 17533-17547 Revello Drive**

Pursuant to Section 15073.5 of the State California Environmental Quality Act (CEQA) Guidelines, the Department of City Planning is issuing an Errata to the Mitigated Negative Declaration (ENV-2019-5520-MND) to provide additional information, specifically regarding biological resources and geology/soils.

A Draft Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the Project and circulated from August 19, 2021 through September 20, 2022. The Draft IS/MND identified potential impacts and mitigation measures associated with Biological Resources, Cultural Resources, Geology/Soils, Tribal Cultural Resources, and Mandatory Findings of Significance, and found that mitigation measures identified in the Draft IS/MND would reduce impact levels to less than significant.

The proposed project involves the construction of four (4) single-family residences and one Accessory Dwelling Unit (ADU) on a total development site of 1.35 acre comprised of 12 parcels. Additionally, the Project proposes an approximately 200-ft extension of Revello Drive to west from the easterly terminus of existing roadway to provide vehicular access to the three proposed



residences fronting Revello Drive. Additionally, a turnaround will be proposed per Los Angeles Fire Department regulations and design standards. Total grading for project is approximately 29,148 cubic yards (CY), of which 28,341 CY would be remedial grading and approximately 33,794 CY would be exported/transported from Project site.

The project is requesting a Coastal Development Permit and Mello Act Compliance review for the construction for the construction of four Single-Family Dwelling Units and one Accessory Dwelling Unit. Additionally, the project requests a Zoning Administrator's Determination for the following:

- 1) The construction of a new single-family dwelling located on a lot with a continuous paved roadway that is less than 20 feet; and
- 2) The construction of a new single-family dwelling on a lot with a paved roadway width of less than 20 feet along the frontage of the lot.

During the comment period, the Department of City Planning received a comment letter from the California Department of Fish and Wildlife (CDFW) regarding the proposed projects impacts to biological and ecological resources (dated September 16, 2021).

#### **SECTION IV BIOLOGICAL RESOURCES**

The published Initial Study/Mitigated Negative Declaration (IS/MND) identified five vegetation communities at the Project site and within the 500-foot buffer area (Biological Resources Letter Report dated May 27, 2021) (Appendix B1)). These include disturbed lemonade berry scrub, disturbed quailbush scrub, urban/developed land, ornamental vegetation, and disturbed habitat. The lemonade berry scrub vegetation community is considered sensitive by local, state, and/or federal agencies. approximately 0.62-acre of disturbed lemonade berry scrub would be permanently impacted directly by the project. The IS/MND included mitigation measures to reduce the impacts to the lemonade berry scrub to a less than significant level. The mitigation measure (BIO-1) states:

MM-BIO-1 Prior to the issuance of grading and building permits, the project applicant shall purchase restoration or creation credits of at least 2:1 (1.12 acres for 0.56 acres impacted) to mitigate the project's impact on the sensitive-status Lemonade Berry Scrub vegetation community to a less-than-significant level. The mitigation lands shall be comprised of similar or higher quality vegetation as found in the lemonade berry scrub on the project site. Credits may be purchased from the following conservation and mitigation banks established by the California Department of Fish and Wildlife: Petersen Ranch Mitigation Bank, Santa Paula Creek Mitigation Bank, or Soquel Canyon Mitigation Bank.

During the comment period, the Department of City Planning received a comment letter from the California Department of Fish and Wildlife (CDFW) regarding the proposed projects impacts to biological and ecological resources (dated September 16, 2021). CDFW provided comments related to potential impacts to the Monarch Butterfly, Western Mastiff Bats, Sensitive Vegetation (including the Lemonade Berry Scrub), nesting birds, and impacts related to the use of rodenticides.

The applicant's environmental consultant (DUDEK) prepared a comprehensive response (dated October 14, 2021) to the issues raised in the CDFW letter. In summary the letter concluded that the MND sufficiently analyzed the potential impacts to special-status species and plants, and no additional mitigation measures were necessary.

On May 31, 2022 the Applicant submitted a Memorandum prepared by Dudek regarding Analysis of Proposed Locations for Lemonade Berry Plantings. The Memo provides that Lemonade Berry Scrub will be included in the new landscaping for the proposed development, as shown in the Landscape Plan included as Attachment A. In addition, Attachment B of the Memo further clarifies the areas of existing Lemonade Berry Scrub that were removed in November 2020 and the areas that are proposed to be removed. Both areas were analyzed in the MND and will be mitigated.

## **SECTION VII GEOLOGY/SOILS (REVELLO DRIVE EXTENSION)**

The published Initial Study/Mitigated Negative Declaration (IS/MND) project description includes an approximate 200-foot extension of Revello Drive to serve three of the four proposed homes. The project includes significant grading, retaining walls, and piles to stabilize the proposed houses and the roadway extension. Within the Geology/Soils impact category, the published IS/MND identified a necessary mitigation measure related to paleontology. This mitigation measure (MM-GEO-1) states:

MM-GEO-1 In the event that paleontological resources (i.e., fossil remains) are exposed during construction activities for the proposed Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the qualified paleontologist may record the find and allow work to continue or may recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines and shall be subject to review and approval by the City of Los Angeles. Work in the area of the find may only resume upon approval of a qualified paleontologist.

A public hearing for the project was held by the Department of City Planning on September 19, 2021, and the cases were placed under advisement pending the submission of additional materials detailing the work necessary to extend Revello Drive. In response and based upon conversations with the Bureau of Engineering-Geotechnical Engineering Division, Stony-Miller Consultants (on behalf of the applicants) submitted two memos dated June 15, 2022 and July 1, 2022 detailing and explaining the necessary work required to accommodate improvements along Tramonto Drive and to extend Revello Drive. In a memo dated July 8, 2022, the Department of City Planning requested that the Bureau of Engineering-Geotechnical Engineering Division (BOEGED) review the submitted materials regarding its feasibility, its compliance with City regulations/standards, and the need for additional information under the B-Permit process.

In a memo dated July 25, 2022 to the Department of City Planning, the BOEGED concluded that the roadway was geotechnically feasible subject to the final B-Permit review.

## **RECIRCULATION IS NOT REQUIRED**

Once an MND has been circulated, it may need to be recirculated for another round of review and comment if it is "substantially revised" after the public notice of the first circulation period has been given. (CEQA Guidelines § 15073.5(a).) A substantial revision includes two situations (CEQA Guidelines § 15073.5(b)):

1. A new, avoidable significant effect is identified, and to reduce that effect to a level of insignificance, mitigation measures or project revisions must be added.

2. The lead agency finds that the mitigation measures or project revisions originally included in the negative declaration will not reduce potentially significant impacts to a level of insignificance, and new mitigation measures or project revisions are required.

Recirculation is required when the addition of new information deprives the public of a meaningful opportunity to comment on substantial adverse project impacts or feasible mitigation measures or alternatives that are not adopted. The purpose of recirculation is to give the public and other agencies an opportunity to evaluate the new data and the validity of conclusions drawn from it. The critical issue in determining whether recirculation is required is whether any new information added to the environment document is substantial.

As is the case here, the addition of new information that clarifies, amplifies, or makes insignificant modifications to an MND does not require recirculation. (CEQA Guidelines § 15073.5(c)(4).) New information will only require recirculation when it amounts to a substantial revision of the MND, as defined above. (CEQA Guidelines § 15073.5(b).) As demonstrated herein, is neither a significant, avoidable impact that requires the addition of mitigation measures nor ineffective mitigation measure requiring revisions.

## CONCLUSION

The information contained in this section clarifies, amplifies, or refines information in the IS/MND but does not make any changes that would meet the definition of “significant new information” as defined above. The information added does not change the IS/MND in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project. As analyzed in the IS/MND, the whole of the record supports the conclusion that the Project would result in impacts below a level of significance.

The City, as lead agency, has reviewed the information in this Errata and has determined that it does not change any of the basic findings or conclusions of the Draft IS/MND, nor does it constitute “substantial revisions” pursuant to CEQA Guidelines Section 15073.5, or require recirculation of the Draft IS/MND. This Errata, combined with the Draft IS/MND, including technical appendices and reports thereof, comprise the Final IS/MND.

VINCENT P. BERTONI, AICP  
Director of Planning

  
Juliet Oh  
Senior City Planner

### Enclosures:

Dudek Memorandum: Analysis of Proposed Locations for Lemonade Berry Plantings,  
dated May 31, 2022

BOE GED Memorandum, dated July 25, 2022

Stony-Miller Consultants Reports, dated June 15, 2022 and July 1, 2022

## MEMORANDUM

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**To:** Springhouse Hamilton Park, LLC | JDR Revello LLC  
**From:** Michael Cady | Senior Biologist  
**Subject:** Analysis of Proposed Locations for Lemonade Berry Plantings  
**Date:** May 31, 2022  
**cc:** Tony Russo | Crest Real Estate – Director, Discretionary Entitlements Division  
**Attachment:** A. Preliminary Landscaping Plan; B. Vegetation Communities and Proposed Planting Corridors

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This memorandum provides the ecological content for the proposed planting of lemonade berry (*Rhus integrifolia*) at the Revello-Tramonto Project (Project). The Project is in the neighborhood of Brentwood-Pacific Palisades in the City of Los Angeles, Los Angeles County, California. Previous biological resource surveys conducted by Dudek consisted of vegetation community mapping, seasonally appropriate floristic surveys for special status plants, and assessment of Sensitive Natural Communities and 1-parameter wetlands, which are thoroughly discussed in a previous prepared Biological Resources Letter Report.<sup>1</sup> Additionally, Dudek prepared an Investigation of Potential Environmentally Sensitive Habitat Area (ESHA) for the Project.<sup>2</sup>

### Project Summary

The Project involves the construction of four new single-family residences. A 9,051 square-foot residence (with an additional 5,887 square-foot basement) would be located at 17538, 17544, 17550 Tramonto Drive. A 4,160 square-foot residence (with an additional 5,096 square-foot basement), would be located at 17532, 17540, 17548 Revello Drive. A 2,619 square-foot residence (with an additional 2,428 square-foot basement) would be located at 17523, 17529 Revello Drive. Lastly, a 6,078 square-foot residence (with an additional 7,949 square-foot basement) would be located at 17531, 17533, 17537, 17541 Revello Drive.

### Preliminary Landscaping Plan

The Project's Preliminary Landscaping Plan (Attachment A) indicates where lemonade berry is proposed to be planted for each of the four new single-family residences. For the 17550 Tramonto Drive, the lemonade berry is proposed to be planted along the eastern portion in what is currently mapped as disturbed habitat and ornamental vegetation (Attachment B). For 17533 W Revello Drive, the lemonade berry is proposed to be planted along the northern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B). For 17523 W Revello Drive, the lemonade berry is proposed to be planted along the northern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B).

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<sup>1</sup> Dudek. 2021. Biological Resources Letter Report for the Revello Drive and Tramonto Drive Residential Project, City of Los Angeles, California. May 27, 2021.

<sup>2</sup> Dudek. 2022. Investigation of Potential ESHA at the Revello-Tramonto Project. March 25, 2022.



For 17532 W Revello Drive, the lemonade berry is proposed to be planted along the southern portion in what is currently mapped as disturbed lemonade berry scrub and ornamental vegetation (Attachment B).

It is important to note the approved geology and soil report for the Project recommends the entire development site be as impermeable as much as possible to mitigate the infiltration of water into the area where a landslide previously occurred. As such, the proposed planting areas for the lemonade berry scrub are limited to sloped terrain, where impermeable surfaces are not feasible. Specifically, the report states:

"The site engineers and designers should be aware that the site is geotechnically unsuitable for the local discharge of onsite storm water due to the sloping conditions and the high likelihood that discharged water would adversely saturate the soils and landslide materials. It is recommended that the area be impermeable as much as possible such that rain water captured on site will be directed/drain into the storm water system and does not infiltrate into the ground."

## Analysis

Remnant patches of this vegetation community are found in undeveloped areas of the study area, including the project site, and are mapped as disturbed lemonade berry scrub due to the high cover of non-native species (within the rapid assessment area, 31 percent absolute cover and 39 percent relative cover of vegetation), fragmentation from adjacent stands of ornamental plantings and disturbed areas, presence of a historic landslide that continues to move downhill, and anthropogenic disturbances (e.g., pedestrian trails, trash dumping, and regular mowing). While the existing lemonade berry onsite and in the adjacent parcels is not pristine, planting lemonade berry in the northern portions of 17533 W Revello Drive and 17523 W Revello Drive would provide a continuous connection to lemonade berry scrub to the east and west of these locations. It would be expected that native and non-native plant species in the adjacent area would naturally spread into the landscape portions of the site. As the planted and volunteer shrubs mature, it is expected that common urban-adapted, terrestrial wildlife (such as Virginia opossum, Audubon's cottontail, California ground squirrel, deer mouse, and raccoon) could use the connected habitat for local movement and it would provide refugia from predators (e.g., raptors, owls, and coyote).

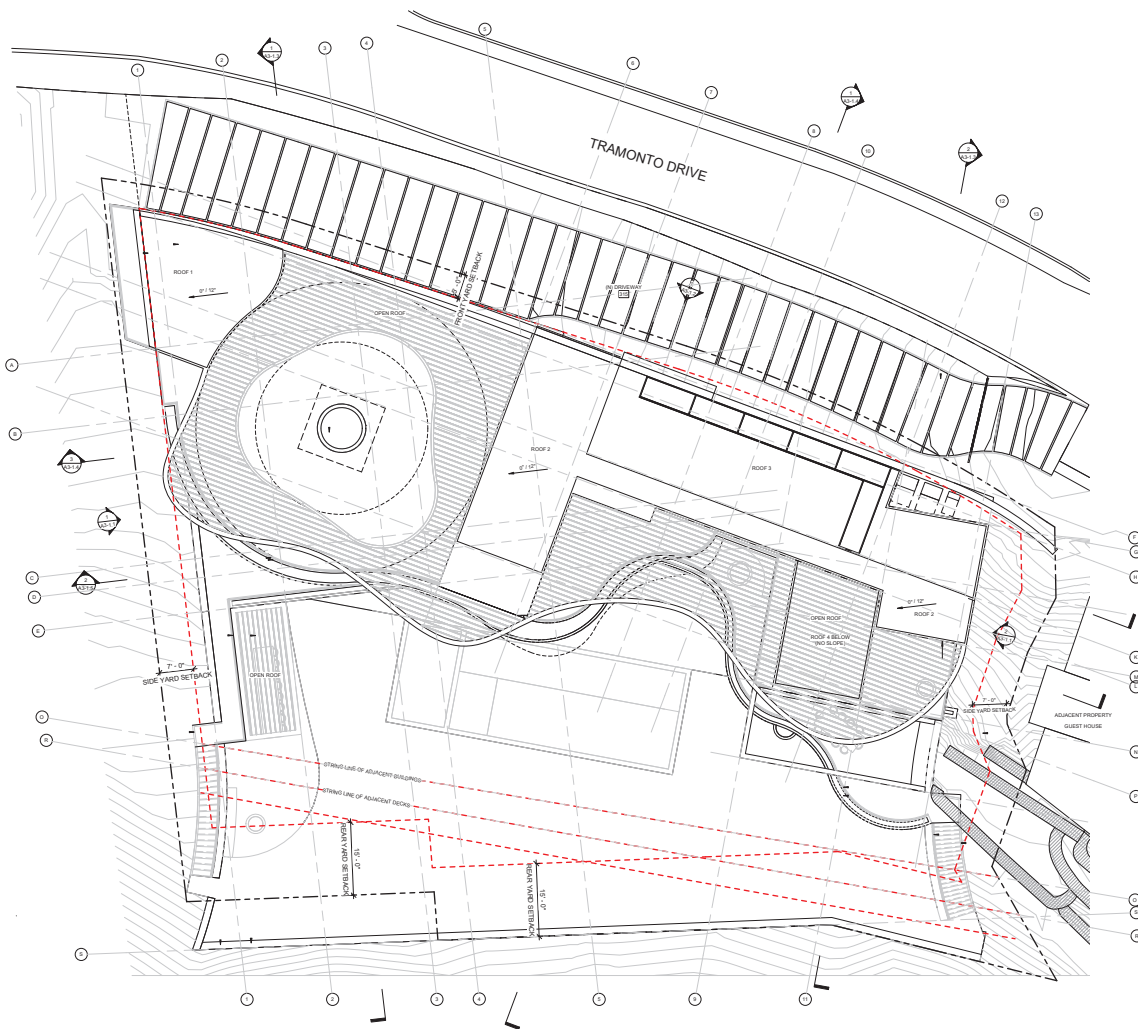
## Conclusion

The proposed replanting lemonade berry scrub areas are in favorable locations, especially on 17523 and 17533 Revello Drive, based on the following reasons:

- (1) occur within existing lemonade berry scrub areas;
- (2) create connectivity between existing lemonade berry scrub areas to the east and west of the project; and
- (3) may help preserve and create lemonade berry scrub in this area by creating a corridor that could continue to be extended and maintained with consistent regulatory oversight of future development in the adjacent parcels, as depicted in Attachment B.

# **Attachment A**

## Preliminary Landscaping Plan



1 SITE PLAN

SCALE: 1/8\"/>

17550 TRAMONTO DRIVE  
LOS ANGELES, CA 90272

PRELIMINARY LANDSCAPE PLAN

DATE AND DATE:  
PROJECT NO.

PROJECT STATUS:  
IN PROGRESS

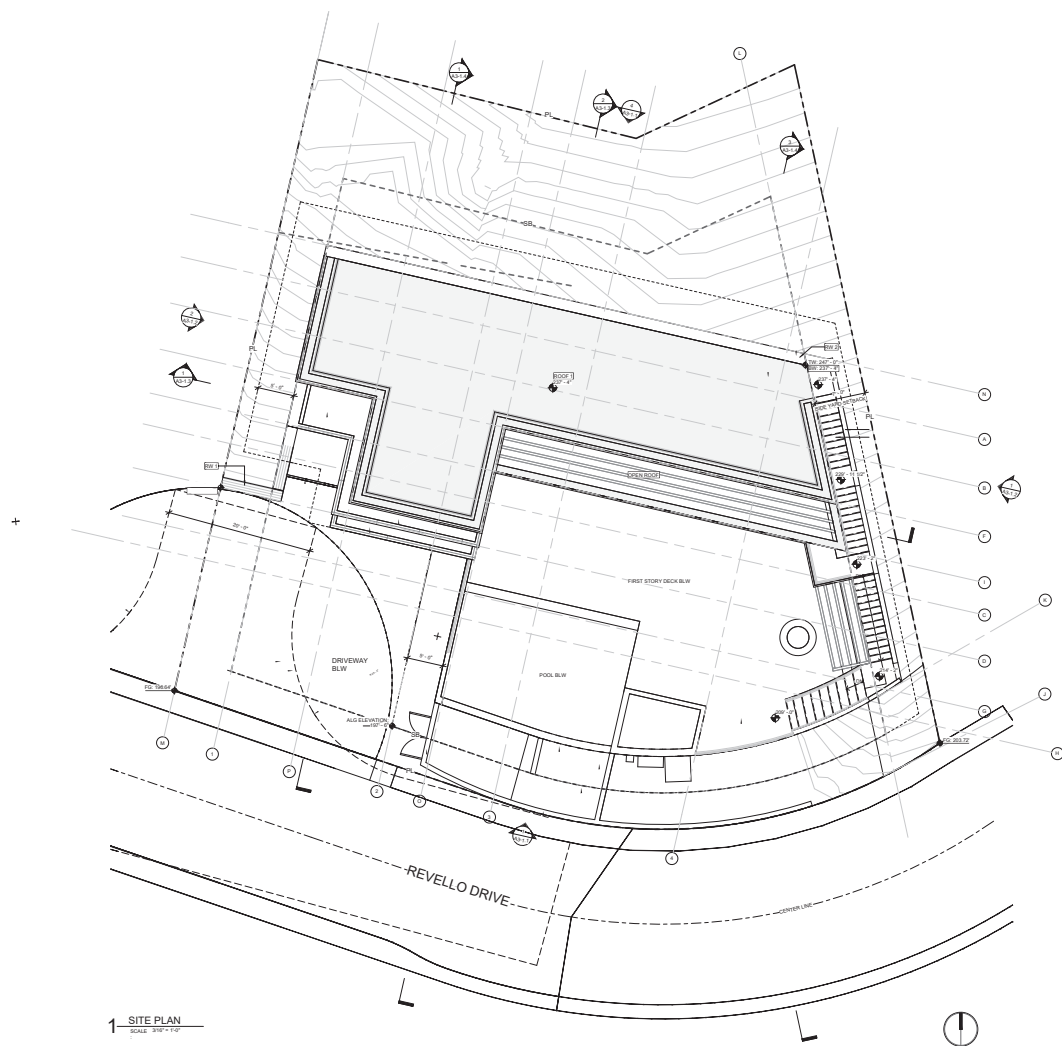
PROJECT NO.  
DRAWN BY

CHECKED BY  
SCALE: 1/8\"/>

SHEET NO.  
L1





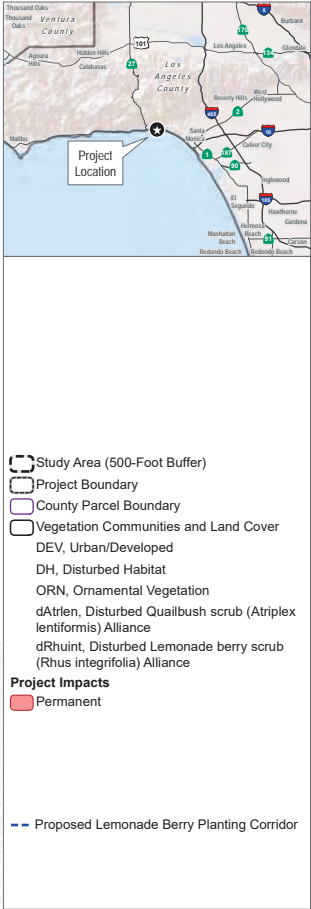


1 SITE PLAN  
SCALE: 3/8" = 1'-0"



# **Attachment B**

## Vegetation Communities and Proposed Planting Corridors



SOURCE: Los Angeles County 2011, Bing Maps 2019



# Vegetation Communities and Proposed Planting Corridors

Revello Drive and Trancento Drive Residential Project



CITY OF LOS ANGELES  
INTER-DEPARTMENTAL CORRESPONDENCE

Date: July 25, 2022

To: Juliet Oh, Senior City Planner  
West/Coastal Project Planning Division  
Department of City Planning

From: Patrick J. Schmidt, P.E., G.E., Division Manager  
Geotechnical Engineering Division  
Bureau of Engineering, Department of Public Works

Subject: **17538-17550 TRAMONTO DRIVE; 17532-17548 REVELLO DRIVE;  
17523-17529 REVELLO DRIVE; 17533-17547 REVELLO DRIVE; CASE  
NOS. DIR-2019-6352-CDP-MEL; DIR-2019-5524-CDP-MEL, ZA-2019-  
5525-ZAD; DIR-2019-5571-CDP-MEL, ZA-2019-5574-ZAD; DIR-2019-  
5584-CDP-MEL, ZA-2019-5585-ZAD  
TRAMONTO DRIVE, REVELLO DRIVE, AND STORM DRAIN  
IMPROVEMENTS - GEOTECHNICAL REVIEW  
GED FILE NO.: 20-024 W.O. NO.: BR403025**

In response to a request dated July 8, 2022, from the Department of City Planning to review this project to provide comments regarding the feasibility of the proposed work, its compliance with City regulations/standards, and the need for additional information that maybe required under the B-Permit process, the Geotechnical Engineering Division (GED) of the Bureau of Engineering (BOE), in the Department of Public Works, has reviewed the following documentation:

- Project Summary/Overview: Interim and Supplement Report, Properties: DIR-2019-6352-CDP-MEL for 17538, 17544, 17550 Tramonto Drive ("SHP 1") DIR-2019-5524-CDP-MEL and ZA-2019-5525-ZAD for 17532, 17540, 17548 Revello Drive ("SHP 2") DIR-2019-5571-CDP-MEL; ZA-2019-5574-ZAD for 17523, 17529 Revello Drive ("JDR 1") DIR-2019-5584-CDP-MEL and ZA-2019-5585-ZAD for 17533, 17537, 17541, 17547 Revello Drive ("JDR 2") ENV-2019-5520-MND (collectively referred to as "the project"), Report No: 22-14920, Project Nos: 14185-01, 14186-01, 14188-01, 14189-01, prepared by Stoney-Miller Consultants, Inc. dated July 1, 2022.

As part of our review, the GED also considered the contents of previous reports provided by the applicant, listed here:

- Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17523 and 17529 Revello Drive, by Stoney-Miller Consultants, Inc. dated June 27, 2019.
- Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17532, 17540, and 17548 Revello Drive, by Stoney-Miller Consultants, Inc. dated June 27, 2019.
- Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17533, 17537, 17541, and 17547 Revello Drive, by Stoney-Miller Consultants, Inc. dated June 27, 2019.
- Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17538, 17544 and 17550 Tramonto Drive, by Stoney-Miller Consultants,

Inc. dated June 27, 2019.

- Geotechnical Review of 40-Scale Grading Plans, and Response to LADBS Review dated July 25, 2019, combined addresses, by Stoney-Miller Consultants, Inc. dated October 24, 2019.
- Hydrology and Hydraulics Revello Residence, combined addresses, by VCA Engineers, Inc. dated November 4, 2019.
- Geotechnical Response to LADBS Review dated December 5, 2019, combined addresses, by Stoney-Miller Consultants, Inc. dated December 30, 2019, revised January 20, 2020.
- Geotechnical Response to LADBS Review dated February 13, 2020, combined addresses, by Stoney-Miller Consultants, Inc. dated April 7, 2020.
- Geotechnical Evaluation of Existing Storm Drain Alignment and Proposed Replacement Related to New Residence Construction, Revello Drive at Eastern Edge of Tramonto Landslide, by Stoney-Miller Consultants, Inc. dated May 4, 2020.
- Geotechnical Response to LADBS Review dated May 14, 2020, combined addresses, by Stoney-Miller Consultants, Inc. dated June 4, 2020.
- Addendum to Geotechnical Response to LADBS Review dated May 14, 2020, combined addresses, by Stoney-Miller Consultants, Inc. dated June 26, 2020 (revised).
- Supplemental Debris Volume Calculations for Reduced Fence/Wall Height, combined addresses, by Stoney-Miller Consultants, Inc. dated July 17, 2020.
- Geotechnical Evaluation of Temporary Construction Stability, combined addresses, by Stoney-Miller Consultants, Inc. dated August 24, 2020.
- Conceptual Program for Construction Monitoring of Stability, combined addresses, by Stoney-Miller Consultants, Inc. dated September 2, 2020.
- Geology and Soils Report Approval Letter, combined addressed, from Los Angeles Department of Building and Safety, Log #109015-04 dated September 14, 2020.

In addition, the GED has considered various communications between the GED and the applicant during our ongoing B-Permit review process. The GED's most recent official B-Permit review letter was issued May 4, 2021, and included 52 comments. Though some of the comments have been discussed since that time, the GED has not received a full response to that 2021 review and many of the issues raised have not been resolved.

In general, the GED's review is limited to portions of the project within, adjacent to, or potentially affecting the public right-of-way within the City of Los Angeles, including utility easements on private property.

Please note: the request from Planning specifically asks the GED to review this project for its compliance with City regulations/standards, and the need for additional information that maybe required under the B-Permit process. The GED's review is only geotechnical in nature. Full 'compliance with City regulations/standards' requires review by the Los Angeles Department of Building and Safety (LADBS), other Bureaus and Departments, and other Divisions and Groups within BOE.

In particular, Revello Drive for its proposed western extension from its current terminus into and through the proposed development area, the roadway elevations will need to be discussed with and approved by the West Los Angeles district office and any other agency with jurisdiction over this development prior to the GED approval.

The proposed development is approximately in the middle of the southwest facing slope of the Castellammare Mesa area in the Pacific Palisades community of the City of Los Angeles, an area with historic and ongoing landslide activity. The development includes a portion of, and is flanked on the west by, the Tramonto Landslide which extends from the Pacific Coast Highway up to Tramonto Drive at the top of the mesa. The entire project site is underlain by existing landslide debris or is directly adjacent to such. The Tramonto Landslide has had repeated episodes of movement over the years to this day which has resulted in the destruction of the public right of way where the failure crosses Castellammare Drive, Stretto Way, and Revello Drive, necessitating the construction of a bulkhead at Tramonto Drive. Detailed plans for the entire proposed development were not submitted to the GED. However, reports and preliminary plans relating to the construction in and adjacent to the public right of way adjacent to the Tramonto Bulkhead as well as the extension of Revello Drive were provided and reviewed.

The above reports propose to stabilize the slope above and below the subject properties to sufficiently raise the safety factor of the subject properties themselves to within building code compliance. The increased stability is to be achieved by the installation of multiple rows of piles and shear pins.

While the proposed pile and shear pin rows will provide improved stability on the northeastern section of the Tramonto landslide, there will still be the possibility of localized failures below and adjacent to the proposed development. The reports demonstrate the proposed development lots meet the building code required factor of safety.

It is also demonstrated that the overall stability of Tramonto and Revello Drives will be improved by the proposed pile rows. However, since it is proposed to reconstruct the roadway of Revello Drive on top of existing firm and unyielding landslide debris, the roadway itself will be required to be constructed in conformance with City and GED standards for roadways in potentially unstable terrain, which is to derive support from piles founded in competent bedrock on the downslope side of the roadway. Since the current proposal is to provide retaining walls on both the upslope (north) and downslope (south) side of the roadway, the design will need to be further discussed and may be revised during the B-permit process. Other measures under the bulk of the roadway will need to be fully developed to mitigate potential settlement of the landslide debris.

It is important to note that the proposed stabilization plan does not include 'global' dewatering of the slide area to improve stability. Inclusion of dewatering as part of the overall method of stabilization, for landslides that have groundwater as one of its controlling factors, is generally considered to be beneficial. With that in mind, if any such dewatering plans for the area are presented in the future, such a plan might utilize the right of way and public easements in the area for the construction and emplacement of dewatering elements. After a standard geotechnical review, such dewatering plans would likely have the support of GED.

The proposed development includes a proposed storm drain on the westernmost side of site that conveys stormwater and some groundwater from the Tramonto Drive bulkhead and driveway as well as tributary areas downslope to Revello Drive. Specific geotechnical recommendations and plans for this storm drain have not been provided to the GED at this

time and will need to be reviewed and approved by the GED prior to approval of the B-permit.

Based on the plans and information provided to the GED at this time as part of the B-permit review process, we consider that the proposed work is **geotechnically feasible**. The final B-permit review is not complete and not approved at this time. Final B-permit approval will require additional information from the developer and may require revisions to the project design. Approval would require conformance with the following standard requirements:

- i) Cut or fill slopes in artificial fill and residual soils shall be no steeper than 2:1 (H:V). Cut slopes shall be no steeper than 1.5:1 (H:V) in competent bedrock.
- ii) The unprotected toes and crests of all cut and fill slopes shall be located on private property and shall be set back 2 and 3 feet, respectively, from the property line.
- iii) All streets shall be founded upon firm natural materials or properly compacted fill. Any existing loose soils, including landslide debris or organic material shall be removed to a minimum depth of two feet, prior to the placement of engineered fill.
- iv) Fill material in the public right of way shall be compacted to a minimum of 90 percent relative compaction per Greenbook requirements. Fill shall be benched into competent material.
- v) All slopes shall have appropriate drainage control directed to approved locations, and include appropriate erosion protection such as irrigated landscaping. Any irrigation needs to be designed to limit infiltration into the underlying landslide debris.
- vi) Adequate sub-drain systems approved by the City Engineer shall be placed beneath canyon fills, over-excavation areas, shear keys, buttresses, and behind retaining walls.
- vii) Surface and subsurface drainage must be conveyed in a non-erosive manner to an approved location.
- viii) Slopes that are not demonstrated per grading code to have strength characteristics sufficient to produce a stable slope shall be supported by either a retaining wall or a designed buttress fill.
- ix) A representative from the consultant's office working under a certified engineering geologist or geotechnical engineer shall verify the depth of the drilled holes and log the holes to verify that the assumed bedrock materials and subsurface conditions are encountered during construction.
- x) Where not in conflict with the above, the recommendations and requirements contained in the letters and reports referenced above prepared by Stoney-Miller Consultants, Inc., VCA Engineers, Inc., and LADBS, as well as any future letters or reports reviewed and approved by the City shall be implemented.



- xi) Additional review of the project plans and certain details of the proposed project are required to be reviewed and approved by GED during the B-permit process.

As stated above, this letter in no way grants or recommends this project for approval with respect to the GED B-permit review process which currently ongoing and subject to further review.

The B-Permit for this project is **NOT** approved by the GED at this time.

The GED finds that numerous project elements **will require a more specific and detailed review** by the GED through the B-Permit process as noted below prior to the granting of the permit. This is by no means an exhaustive list of the remaining items under review by the GED, however it serves as a roadmap for the remaining areas of geotechnical concern that will be addressed to the satisfaction of the GED during the B-Permit review process.:

1. The GED has not been provided final design plans. The GED needs to review and approve all relevant project plans prior to permit approval during the B-permit process.
2. A detailed monitoring plan needs to be fully developed to gauge earth movement during and post construction, including for the existing bulkhead and proposed improvements appurtenant to it as well as for the right of way of Revello Drive.
3. Requirements for observations/testing/monitoring/reporting (outside of earth movement monitoring) during construction/grading and after construction have not been finalized and need to be more fully developed to address the specific needs of the site.
4. Slope stability analysis for several parts of the project including support of the existing bulkhead at Tramonto Drive and the proposed design of Revello Drive, have not been accepted at this time by the GED. Resolution of these issues during the B-permit process may require revision to the design in these areas.
5. The specific details of how the Tramonto Bulkhead is going to be incorporated into the proposed development have not been finalized. This aspect of the proposed project still needs to be reviewed and approved by the GED during the B-permit process and is expected to require an affidavit assigning responsibility to the adjacent private property owner.
6. To conform to existing GED standards, any new roadway, including Revello Drive, will need to derive primary support on the downslope side of the roadway using piles bearing in bedrock or suitable materials. Since the current proposal is to provide retaining walls on both the upslope (north) and downslope (south) side of the roadway, the design will need to be further discussed and may be revised during the B-permit process. Mitigation of potential settlement of the roadway upslope of said piles also needs to be addressed.
7. Pile dimensions, spacing, density, and number are subject to change based on responses to some GED comments and concerns discussed here. Though the final

designs may be within the range of pile parameters in the July 1, 2022 Project Summary, the designs, especially for the Revello Drive extension, are not developed enough to confirm that at this time.

8. The grading requirements for the right of way, including minimum removal and recompaction depths, are incomplete and need to be finalized to city standards and to the specific needs of the site.
9. At the completion of construction, the geotechnical consultant shall prepare a written report documenting the earthwork, including placement of drainage materials and wall backfill, and construction of retaining wall piles. The potential contents and scope of this report need to be provided to the GED for review and approval.
10. All utility pipes within the public right of way shall be constructed in accordance with the applicable portions of the Standard Specifications for Public Works Construction "Greenbook" or exceed those standards as required GED to meet the needs of the site. Densification by flooding or jetting is not allowed.
11. All wet utilities (including LADWP water lines) within the right of way and transitions to/from private property need to be designed in a way to monitor potential leaks, and to capture and direct leaks to approved locations.
12. The proposed storm drain on the western project property line needs to be fully designed and plans presented to the GED for review and approval. This design may require the placement of piles or other means of support. This storm drain may be ultimately developed as a public storm drain within a new easement or as a private utility. It is the GED's preference for this to be developed as a private utility with an established maintenance responsibility assigned to the private property owners by Affidavit.
13. For the western extension of Revello Drive from its current terminus into and through the proposed development area, the roadway elevations will need to be discussed with and approved by the West Los Angeles district office and any other agency with jurisdiction over this development prior to the GED approval.
14. All site drainage, surface and subsurface, and irrigation overflow needs to be conveyed in a manner to prevent or extremely limit leakage into the subgrade and to have it directed to an approved location, all to be reviewed and approved by the GED.

Further comments or concerns outside of those listed above may be raised by the GED during the ongoing B-Permit review process. Additionally, it is noted that these comments/concerns are from a geotechnical and geologic perspective only and may not reflect comments or requirements of other Divisions, Bureaus, or Departments within the City of Los Angeles or other local/State/Federal agencies with jurisdiction over this development.

If you have any questions, please contact Benjamin Moore at Benjamin.Moore@lacity.org or Eric Noreen at Eric.Noreen@lacity.org.

June 15, 2022

Bureau of Engineering  
Geotechnical Engineering Division  
1149 S. Broadway, Suite 120  
Los Angeles, CA 90015

Report No: -  
Project Nos: 14185-01  
14186-01  
14188-01  
14189-01

Subject: **Project Summary/Overview: Interim and Supplement Report**

Properties: DIR-2019-6352-CDP-MEL for  
17538, 17544, 17550 Tramonto Drive (“SHP 1”)  
DIR-2019-5524-CDP-MEL and ZA-2019-5525-ZAD for  
17532, 17540, 17548 Revello Drive (“SHP 2”)  
DIR-2019-5571-CDP-MEL; ZA-2019-5574-ZAD for  
17523, 17529 Revello Drive (“JDR 1”)  
DIR-2019-5584-CDP-MEL and ZA-2019-5585-ZAD for  
17533, 17537, 17541, 17547 Revello Drive (“JDR 2”)  
ENV-2019-5520-MND  
(collectively referred to as “the project”)

Per the request of the Los Angeles City Planning and the City of Los Angeles, Bureau of Engineering, Geotechnical Engineering Division, this memorandum is prepared to summarize the proposed scope of work performed within the right-of-way along Tramonto Drive and Revello Drive fronting the subject properties and in connection with the previously submitted reports referenced in Appendix A.

#### Tramonto Drive Right-of-Way

The project proposes improvements to and within a portion of the right-of-way that is approximately 25 feet wide that fronts 17538, 17544 and 17550 Tramonto Drive. The proposed improvements that are generally described below.

- (1) ~~A~~The construction of a roadway ramp, which descends from east-to-west, that is approximately 18 feet wide and approximately 215 feet long that runs parallel to and directly in front of the existing bulkhead to provide vehicular access to the proposed Tramonto home. This new roadway section would be stabilized and protected to the north by the existing bulkhead and the new retaining wall and piles described under Item 2 and to the south by the proposed piles and structures on the properties directly downslope.
- (2) ~~A~~The construction of a retaining wall on the north side of the roadway ramp abutting the existing bulkhead. This retaining wall will vary in height from approximately 1’ to 12’

and be supported by piles directly below the wall. The top of the wall will also be entirely below the existing improved roadway surface along Tramonto Drive.

- (3) ~~A~~If required pending a field inspection, the possible removal and recompaction of 2 feet of soil below the finished roadway surface.
- (4) ~~A~~If required pending a field inspection, the possible removal and recompaction of 2 feet of soil below the finished roadway surface along the entire proposed roadway ramp. In addition, both cut and fill will be required along the entire roadway extension to accommodate a descending roadway design.
- (5) ~~A~~The installation of a subdrainage system directly below and along the entire new roadway surface.
- (6) ~~A~~The construction of a curb and gutter on the north and south sides of the new roadway ramp.
- (7) ~~A~~The construction of a catch basin at the westerly terminus of the roadway ramp to capture the water run-off exclusively from this new roadway area. Water conveyed into the catch basin will outlet into a storm drain pipe, which will be supported by piles, that will run along the western property line of 17550 Tramonto Drive and 17547 Revello Drive. This pipe will connect to a drain outlet box and discharge water onto Revello Drive as explained below.
- (8) ~~A~~Per the directive of the Bureau of Engineering, West LA District Office, the possible construction of a sidewalk, curb, gutter and guardrail on the south side of the existing improved roadway along Tramonto Drive.
- (9) ~~S~~ewer, power, water, gas and communications utilities will be run from the main under the existing improved roadway to the proposed home.
- (10) ~~A~~The cumulative amount of grading work for the proposed improvements within the Tramonto right-of-way is approximately 954 yd<sup>3</sup> (239 yd<sup>3</sup> of cut, 141 yd<sup>3</sup> of fill, 287 yd<sup>3</sup> of removal and 287 yd<sup>3</sup> of recompaction). The estimated amount of export for this grading work is 98 yd<sup>3</sup>.

#### Revello Drive Right-of-Way

The project proposes improvements to and within a 26-foot wide right-of-way that fronts 17523, 17529, 17532, 17533, 17537, 17540 and 17541, 17547 and 17548 Revello Drive. The proposed improvements are generally described below.

- (1) ~~A~~The construction of a roadway extension, which ascends from east-to-west, that is 20 feet wide and approximately 225 feet long to provide vehicular access to the three proposed Revello homes. This section of roadway would be stabilized and protected by the



proposed piles and structures located within the right-of-way and on the properties directly upslope and downslope of this roadway.

- (2) The construction of three retaining wall sections as follows:
  - a. On the south side of the roadway, this section will front a portion of 17540 Revello Drive and all of 17548 Revello Drive, vary in height from approximately 1' to 17' and be supported by piles;
  - b. On the north side of the roadway, this section will front a portion of 17547 Revello Drive, vary in height from approximately 1' to 9' and be supported by piles;
  - c. Along the westerly terminus of the roadway, this section will front the right-of-way, vary in height from approximately 9' to 17' and be supported by piles;
- (3) If required pending a field inspection, the possible removal and recompaction of 5 feet of soil below the existing grade under and along the entire proposed roadway extension. In addition, both cut and fill will be required to accommodate the ascending roadway design.
- (4) The installation of a subdrainage system below the new roadway surface.
- (5) The construction of a curb and possibly a gutter on the north and south sides of the new roadway extension per the directive of the Bureau of Engineering, West LA District Office.
- (6) The construction of a storm drain outlet on the north side of the street at the westerly terminus of the roadway extension to convey the water run-off captured from the new roadway ramp within the Tramonto right-of-way and the three upslope Tramonto properties. Water conveyed into the drain outlet from above will discharge onto Revello Drive. Drainage from water runoff onto the new roadway extension will sheet flow easterly into the city-approved inlet structure in front of 17526 Revello Drive and conveyed into the main line under the PCH through an above ground 24-inch corrugated metal pipe.
- (7) Sewer, power, water, gas and communications utilities will be extended under the roadway from their current terminus point in front of 17520 Revello Drive to each of the three homes.
- (8) The construction of a turnaround located within the first 30 feet of the upslope, adjoining properties 17529 and 17533 Revello Drive. The turnaround would be designed and built per Los Angeles Fire Department (LAFD) regulations and design standards.
- (9) If required pending a field inspection, the possible removal and recompaction of 5 feet of soil below the existing grade under and along the entire proposed roadway extension. In addition, both cut and fill will be required to accommodate the ascending roadway design.

June 15, 2022

Report No: \_\_\_\_ - \_\_\_\_

Page No: \_\_\_\_ 4

- (10) The cumulative amount of grading work for the proposed improvements within the Revello right-of-way is approximately 3,665 yd<sup>3</sup> (945 yd<sup>3</sup> of cut, 553 yd<sup>3</sup> of fill, 1,083 yd<sup>3</sup> of removal and 1,083 yd<sup>3</sup> of recompaction). The estimated amount of export for the associated grade work is 392 yd<sup>3</sup>.

This opportunity to be of service is appreciated. If you have any questions, please don't hesitate to call our office.

Respectfully submitted,

STONEY-MILLER CONSULTANTS, INC

KAT/HHR: ma

Attachments:

Appendix A - Referenced Reports

Distribution: Addressee via email

June 15, 2022

Report No: \_\_\_\_ - \_\_\_\_  
Page No: \_\_\_\_\_ 5

**APPENDIX A**  
**REFERENCED REPORTS**

1. ÅStoney-Miller Consultants, Inc. Report dated June 27, 2019,  
“Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, and 8, Block 16), Pacific Palisades, Los Angeles, California”, Project No. 14185-00, Report No. 19-14317.
2. ÅStoney-Miller Consultants, Inc. Report dated June 27, 2019,  
“Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17523 and 17529 Revello Drive (Combined Lots 7 & 8, Block 15), Pacific Palisades, Los Angeles, California”, Project No. 14188-00, Report No. 19-14311.
3. ÅStoney-Miller Consultants, Inc. Report dated June 27, 2019,  
“Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, Los Angeles, California”, Project No. 14186-00, Report No. 19-14309.
4. ÅStoney-Miller Consultants, Inc. Report dated June 27, 2019,  
“Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3,4,5, and 6, Block 15), Pacific Palisades, Los Angeles, California”, Project No. 14189-00, Report No. 19-14318.
5. ÅStoney-Miller Consultants, Inc. Report dated October 24, 2019,  
“Geotechnical Review of 40-Scale Grading Plans, and Response to LADBS Review dated July 25, 2019, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 19-14330.
6. ÅStoney-Miller Consultants, Inc. Report revised and dated January 20, 2020,  
“Geotechnical Response to LADBS Review dated December 5, 2019, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 19-14373R, revised, dated January 20, 2020.
7. ÅStoney-Miller Consultants, Inc. Report dated April 7, 2020,  
“Geotechnical Response to LADBS Review dated February 13, 2020, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550



Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14391.

8. ~~A~~Stoney-Miller Consultants, Inc. Report dated June 4, 2020,  
“Geotechnical Response to LADBS Review dated May 14, 2020, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14416.
9. ~~A~~Stoney-Miller Consultants, Inc. Report dated June 26, 2020,  
“Geotechnical Response to LADBS Review dated May 14, 2020, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14424.
10. ~~A~~Stoney-Miller Consultants, Inc. Report dated July 17, 2020,  
“Supplemental Debris Volume Calculations for Reduced Fence/Wall Height, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14442R.
11. ~~A~~Stoney-Miller Consultants, Inc. Report dated August 20, 2020,  
“Geotechnical Evaluation of Geotechnical Evaluation of Historic Landslide Area, Clarification for Modification of Building Ordinances, 17532, (17540 and 17548) Revello Drive (Combined Lots 3, 4, 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project No. 14186-01, Report No. 20-14469, Permit Application No.: 19030-30000-08655.
12. ~~A~~Stoney-Miller Consultants, Inc. Report dated August 20, 2020,  
“Geotechnical Evaluation of Building Setback, Request for Modification of Building Ordinances, 17533, (17537, 17541 and 17547) Revello Drive (Combined Lots 3, 4, 5 and 6, Block 15), Pacific Palisades, City of Los Angeles, California”, Project No. 14189-01, Report No. 20-14456, Permit Application No.: 19030-30000-08647.
13. ~~A~~Stoney-Miller Consultants, Inc. Report dated August 20, 2020,  
“Geotechnical Evaluation of Building Setback, Request for Modification of Building Ordinances, 17523 (and 17529) Revello Drive (Combined Lots 7 and 8, Block 15),

Pacific Palisades, City of Los Angeles, California”, Project No. 14188-01, Report No. 20-14455, Permit Application No.: 19030-30000-08650.

14. ~~A~~Stoney-Miller Consultants, Inc. Report dated August 24, 2020,  
 Geotechnical Evaluation of Construction Temporary Stability, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14454R.
15. ~~A~~Stoney-Miller Consultants, Inc. Report dated September 2, 2020,  
 “Conceptual Program for Construction Monitoring of Stability, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14472.
16. ~~A~~Stoney-Miller Consultants, Inc. Report dated September 14, 2020,  
 “Repositioning of Western Lateral Pins and Deletion of Retaining Wall per LADBS Request, and Comments Regarding Improvements to Offsite Stability, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14476.
17. ~~A~~City of Los Angeles, Department of Building and Safety, Grading Division  
 Geology and Soil Report Approval Letter dated September 14, 2020,  
 Log # 109015-04  
 Tract: Castellammare (MP 113-3/8)  
 Block: 14 | 15 | 16  
 Lots: 3, 4, 5 | 3, 4, 5, 6, 7, 8 | 6, 7, 8  
 Location: 17538, 17544, 17550 W. Tramonto Drive;  
 17523, 17529, 17532, 17533, 17537, 17540, 17541, 17547, & 17548 W. Revello Drive.
18. ~~A~~Stoney-Miller Consultants, Inc. Report dated December 1, 2020,  
 “Geotechnical Evaluation of City of Los Angeles Streets (Revello Drive and Tramonto Drive) and Storm Drain As Related to Proposed New Residence Construction”, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California, Report No.: 20-14438.

July 1, 2022

Bureau of Engineering  
Geotechnical Engineering Division  
1149 S. Broadway, Suite 120  
Los Angeles, California 90015

Report No: 22-14920  
Project Nos: 14185-01  
14186-01  
14188-01  
14189-01

**Subject: Project Summary/Overview: Interim and Supplement Report**

**Properties:** DIR-2019-6352-CDP-MEL for 17538, 17544, 17550 Tramonto Drive (“SHP 1”)  
DIR-2019-5524-CDP-MEL and ZA-2019-5525-ZAD for 17532, 17540, 17548  
Revello Drive (“SHP 2”)  
DIR-2019-5571-CDP-MEL; ZA-2019-5574-ZAD for 17523, 17529 Revello Drive  
 (“JDR 1”)  
DIR-2019-5584-CDP-MEL and ZA-2019-5585-ZAD for 17533, 17537, 17541,  
17547 Revello Drive (“JDR 2”) ENV-2019-5520-MND  
(collectively referred to as “the project”)

Per the request of the Los Angeles City Planning and the City of Los Angeles, Bureau of Engineering, Geotechnical Engineering Division, this memorandum is prepared to summarize the geotechnical recommendations and proposed scope of work within the right-of-way along Tramonto Drive and Revello Drive fronting the subject properties. Details regarding the geotechnical findings and recommendations for the work are provided in the previously submitted reports referenced in Appendix A.

### **Tramonto Drive Right-of-Way**

The project proposes improvements to and within a portion of the right-of-way that is approximately 25 feet wide fronting 17538, 17544 and 17550 Tramonto Drive. The proposed improvements are generally described below.

- (1) The construction of an improved driveway ramp, which descends from east to west, that is approximately 18 feet wide and approximately 215 feet long that runs parallel to and directly in front of the existing bulkhead to provide vehicular access to the proposed Tramonto home. This new driveway ramp will be stabilized and protected by the existing bulkhead and the proposed piles and structures located within the right-of-way and on the properties directly downslope of this driveway ramp.
- (2) The construction of a retaining wall on the north side of the driveway ramp abutting and below the existing bulkhead. This retaining wall will be approximately 160 feet long and vary in height from approximately 1’ to 12’.

- (3) The retaining wall described under Item 2 will be supported by approximately 20 to 30 piles that are approximately 2 to 4 feet in diameter and spaced approximately 6 to 10 feet on center.
- (4) The removal and recompaction of a minimum of 2 feet of soil below the finished driveway surface along the entire proposed driveway ramp, based on field observations. In addition, both cut and fill will be required along the entire driveway to accommodate a descending ramp design.
- (5) The installation of a subdrainage system directly below and along the entire new driveway ramp.
- (6) The construction of a curb and gutter on the north and south sides of the new driveway ramp.
- (7) Sewer, power, water, gas and communications utilities will connect from the existing main lines run under the existing improved roadway along Tramonto Drive to the proposed Tramonto home at the northeastern corner of the property away from the landslide area.
- (8) The construction of a catch basin at the westerly terminus of the new driveway ramp will capture the water run-off exclusively from this driveway area. Water conveyed into the catch basin will outlet into a pile supported storm drain pipe along the western property line of 17550 Tramonto Drive and 17547 Revello Drive. This pipe will connect to a drain outlet box and discharge water onto the new Revello roadway extension as explained below. Water captured on the three Tramonto lots (17538, 17544, 17550) will be conveyed into this storm drain pipe and directed to a city-approved location.
- (9) Per the directive of the Bureau of Engineering, West LA District Office, the possible construction of a sidewalk, curb, gutter and guardrail on the south side of the existing improved roadway along Tramonto Drive.
- (10) The cumulative amount of grading work for the proposed improvements within the Tramonto right-of-way is approximately 1,000 to 1,200 yd<sup>3</sup>. The approximate amount of net export for the associated grading work is 200 to 400 yd<sup>3</sup>.

### **Revello Drive Right-of-Way**

The project proposes improvements to and within a 26-foot wide right-of-way fronting 17523, 17529, 17532, 17533, 17537, 17540, 17541, 17547 and 17548 Revello Drive. The proposed improvements are generally described below.



- (1) The construction of an improved roadway extension, which ascends from east to west, that is 20 feet wide (curb-face to curb-face) and approximately 225 feet long to provide vehicular access to the three proposed Revello homes. This section of roadway will be stabilized and protected by the proposed piles and structures located within the right-of-way and on the properties directly upslope and downslope of this roadway extension.
- (2) The construction of three retaining wall sections as follows:
  - a. on the south side of the roadway, the wall will front 17540 and 17548 Revello Drive, be approximately 110 feet long and vary in height from 1' to 17';
  - b. on the north side of the roadway, the wall will front 17547 Revello Drive, be approximately 25 feet long and vary in height from approximately 1' to 9'; and
  - c. along the westerly terminus of the roadway, the wall will front the right-of-way, be approximately 33 feet long and vary in height from approximately 9' to 17'.
- (3) The retaining walls described under Item 2 directly above will be supported by approximately 20 to 30 piles that are approximately 2 to 4 feet in diameter and spaced approximately 8 to 10 feet on center. In addition, approximately 6 more piles will be installed under the roadway on the south side of the street fronting the western portion of 17526 Revello Drive. These piles will be approximately 3 to 4 feet in diameter and spaced approximately 8 to 10 feet on center.
- (4) The removal and recompaction of a minimum of 5 feet of soil below the existing grade under and along the entire proposed roadway extension, based on field observations. In addition, both cut and fill will be required to accommodate the ascending roadway design.
- (5) The installation of a subdrainage system below and entirely along the new roadway extension.
- (6) The construction of a curb and possibly a gutter on the north and south sides of the new roadway extension per the directive of the Bureau of Engineering, West LA District Office.
- (7) Sewer, power, water, gas and communications utilities will connect to the three proposed Revello homes by extending the existing main lines, which all currently terminate in front of 17520 Revello Drive, under the proposed roadway extension along Revello Drive.
- (8) The construction of a storm drain outlet box on the north side of the street at the westerly terminus of the new Revello roadway extension will be installed to convey the water runoff from the new storm drain pipe above onto the new Revello roadway extension. Water

July 1, 2022

Report No: 22-14920

Project Nos: 14185-01

14186-01

14188-01

14189-01

Page No: 4

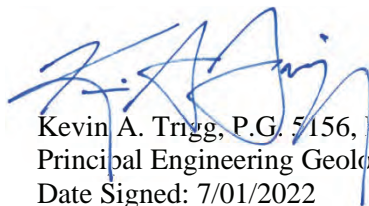
runoff onto the new roadway extension will sheet flow easterly into the city-approved inlet structure fronting 17526 Revello Drive and conveyed through an above ground 24-inch corrugated metal pipe to the main storm drain line under PCH. Water captured on the nine Revello lots (17523, 17529, 17532, 17533, 17537, 17540, 17541, 17547, and 17548) will be conveyed onto the new roadway extension and directed to a city-approved location. In addition, if required by the Bureau of Engineering, West LA District Office, the modification and/or replacement of the existing inlet structure to accommodate the new roadway extension.

- (9) The construction of a turnaround located within the first 30 feet of the upslope, adjoining properties 17529 and 17533 Revello Drive. The turnaround would be designed and built per Los Angeles Fire Department (LAFD) regulations and design standards.
- (10) The cumulative amount of grading work for the proposed improvements within the Revello right-of-way is approximately 4,200 to 4,400 yd<sup>3</sup>. The approximate amount of net export for the associated grading work is 1,000 to 1,200 yd<sup>3</sup>.

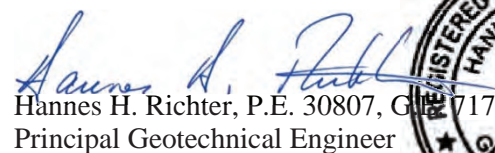
This opportunity to be of service is appreciated. If you have any questions, please don't hesitate to call our office.

Respectfully submitted,

**STONEY-MILLER CONSULTANTS, INC**

  
Kevin A. Trigg, P.G. 5156, E.G. 1619  
Principal Engineering Geologist  
Date Signed: 7/01/2022



  
Hannes H. Richter, P.E. 30807, G.E. 717  
Principal Geotechnical Engineer



KAT/HHR: ma

Attachments: Appendix A – References

Distribution: Addressee via e-mail

## **APPENDIX A**

### **REFERENCED REPORTS**

## APPENDIX A

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4. Stoney-Miller Consultants, Inc. Report dated June 27, 2019, "Preliminary Investigation for Property Stabilization and Proposed New Residence Construction, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3,4,5, and 6, Block 15), Pacific Palisades, Los Angeles, California", Project No. 14189-00, Report No. 19-14318.
5. Stoney-Miller Consultants, Inc. Report dated October 24, 2019, "Geotechnical Review of 40-Scale Grading Plans, and Response to LADBS Review dated July 25, 2019, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades City of Los Angeles, California", Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 19-14330.
6. Stoney-Miller Consultants, Inc. Report revised and dated January 20, 2020, "Geotechnical Response to LADBS Review dated December 5, 2019, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California", Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 19-14373R, revised, dated January 20, 2020.
7. Stoney-Miller Consultants, Inc. Report dated April 7, 2020, "Geotechnical Response to LADBS Review dated February 13, 2020, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive



(Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14391.

8. Stoney-Miller Consultants, Inc. Report dated June 4, 2020, “Geotechnical Response to LADBS Review dated May 14, 2020, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14416.
9. Stoney-Miller Consultants, Inc. Report dated June 26, 2020, “Geotechnical Response to LADBS Review dated May 14, 2020, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14424.
10. Stoney-Miller Consultants, Inc. Report dated July 17, 2020, “Supplemental Debris Volume Calculations for Reduced Fence/Wall Height, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14442R.
11. Stoney-Miller Consultants, Inc. Report dated August 20, 2020, “Geotechnical Evaluation of Geotechnical Evaluation of Historic Landslide Area, Clarification for Modification of Building Ordinances, 17532, (17540 and 17548) Revello Drive (Combined Lots 3, 4, 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project No. 14186-01, Report No. 20-14469, Permit Application No.: 19030-30000-08655.
12. Stoney-Miller Consultants, Inc. Report dated August 20, 2020, “Geotechnical Evaluation of Building Setback, Request for Modification of Building Ordinances, 17533, (17537, 17541 and 17547) Revello Drive (Combined Lots 3, 4, 5 and 6, Block 15), Pacific Palisades, City of Los Angeles, California”, Project No. 14189-01, Report No. 20-14456, Permit Application No.: 19030-30000-08647.
13. Stoney-Miller Consultants, Inc. Report dated August 20, 2020, “Geotechnical Evaluation of Building Setback, Request for Modification of Building Ordinances, 17523 (and 17529) Revello Drive (Combined Lots 7 and 8, Block 15), Pacific Palisades, City of Los Angeles, California”, Project No. 14188-01, Report No. 20-14455, Permit Application No.: 19030-30000-08650.

14. Stoney-Miller Consultants, Inc. Report dated August 24, 2020, Geotechnical Evaluation of Construction Temporary Stability, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14454R.
15. Stoney-Miller Consultants, Inc. Report dated September 2, 2020, “Conceptual Program for Construction Monitoring of Stability, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14472.
16. Stoney-Miller Consultants, Inc. Report dated September 14, 2020, “Repositioning of Western Lateral Pins and Deletion of Retaining Wall per LADBS Request, and Comments Regarding Improvements to Offsite Stability, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California”, Project Nos. 14185-01, 14186-01, 14188-01, 14189-01, Report No. 20-14476.
17. City of Los Angeles, Department of Building and Safety, Grading Division Geology and Soil Report Approval Letter dated September 14, 2020, Log # 109015-04, Tract: Castellammare (MP 113-3/8) Block: 14 | 15 | 16, Lots: 3, 4, 5 | 3, 4, 5, 6, 7, 8 | 6, 7, 8, Location: 17538, 17544, 17550 W. Tramonto Drive; 17523, 17529, 17532, 17533, 17537, 17540, 17541, 17547, & 17548 W. Revello Drive.
18. Stoney-Miller Consultants, Inc. Report dated December 1, 2020, “Geotechnical Evaluation of City of Los Angeles Streets (Revello Drive and Tramonto Drive) and Storm Drain As Related to Proposed New Residence Construction”, 17533, 17537, 17541 and 17547 Revello Drive (Combined Lots 3, 4, 5, and 6, Block 15); 17523 and 17529 Revello Drive (Combined Lots 7 and 8, Block 15); 17538, 17544 and 17550 Tramonto Drive (Combined Lots 6, 7, 8, and western part of Lot 9, Block 16); and 17532, 17540 and 17548 Revello Drive (Combined Lots 3, 4, and 5, Block 14), Pacific Palisades, City of Los Angeles, California, Report No.: 20-14438.

**DEPARTMENT OF  
CITY PLANNING**

COMMISSION OFFICE  
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**CITY PLANNING COMMISSION**

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**November 3, 2023**

**Owners/Applicants**

Springhouse Hamilton Park LLC  
4675 MacArthur Court  
Newport Beach, CA 92660

Demos Development  
661 North Harper Avenue  
Los Angeles, CA 90048

**Representative**

Greg Demos  
Demos Development  
661 North Harper Avenue  
Los Angeles, CA 90048

**RE: ERRATUM NO. 2 to ENV-2019-5520-MND  
17538-17550 Tramonto Drive; 17532-17548 Revello Drive; 17523-17529 Revello  
Drive; 17533-17547 Revello Drive**

Pursuant to Section 15073.5 of the State California Environmental Quality Act (CEQA) Guidelines, the Department of City Planning is issuing a second Erratum to the Mitigated Negative Declaration (ENV-2019-5520-MND) to provide additional information, clarification, and minor modifications for the proposed project. Minor changes are proposed to clarify the project description and to update the list of projects considered in the cumulative impacts analysis.

A Draft Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the Project and Circulated from August 19, 2021 through September 20, 2022. The first Errata was issued on September 23, 2022.

**PROJECT DESCRIPTION**

The proposed project involves the construction of four (4) single-family residences and one Accessory Dwelling Unit (ADU) on a total development site of 1.35 acre comprised of 12 parcels. The Project includes an approximately 200-ft extension of Revello Drive to west from the easterly terminus of existing roadway to provide vehicular access to the three proposed residences

fronting Revello Drive. Additionally, a turnaround will be proposed per Los Angeles Fire Department regulations and design standards. Total grading for project is approximately 29,148 cubic yards (CY), of which 28,341 CY would be remedial grading and approximately 33,794 CY would be exported/transported from Project site.

The project is requesting a Coastal Development Permit and Mello Act Compliance review for the construction for the construction of four Single-Family Dwelling Units and one Accessory Dwelling Unit. Additionally, the project requests a Zoning Administrator's Determination for the following:

- 1) The construction of a new single-family dwelling located on a lot with a continuous paved roadway that is less than 20 feet; and
- 2) The construction of a new single-family dwelling on a lot with a paved roadway width of less than 20 feet along the frontage of the lot.

The Project proposes additional improvement within the public right-of-way, approximately 300 feet east of SHP House 1 (17538, 17544, and 17550 Tramonto Drive), to construct a cross gutter across Revello Drive at the intersection of Tramonto Drive and Revello Drive. The additional improvement was proposed in response to concerns raised by the property owner of 17520 Revello Drive regarding drainage and stormwater runoff, that construction of SHP House 1 would contribute to existing drainage issues in the area. The proposed cross gutter and any other right-of-way improvements to address drainage and stormwater runoff would be subject to review and final approval by the Department of Public Works Bureau of Engineering (BOE).

The Project requires minor improvements and construction within the public right of way, typical of single-family dwellings in hillside areas. Improvements may include roadway repair as a result of construction activity, including but not limited to hauling of earthwork, and construction equipment/material. Such work is required to comply with the requirements of the Department of Building and Safety (LADBS) for the approval of a Haul Route and the BOE during the B-Permit approval process. The applicant is subject to compliance with conditions and requirements outlined in the B-Permit to ensure any improvement of the public right of way is constructed to the satisfaction of the BOE. As such, the proposed cross gutter at the intersection of Tramonto Drive and Revello Drive would not have a significant effect and does not require mitigation.

## **SECTION XXI. MANDATORY FINDINGS OF SIGNIFICANCE – CUMULATIVE IMPACTS**

The Draft IS/MND identified 13 projects in its analysis of any potential cumulative impacts. This Erratum modifies the analysis to include eight new projects proximate to the site and removes seven projects that have been completed or are inactive, a total of 14 projects are considered in the updated cumulative impacts analysis. As provided in the "Updated Cumulative Projects and Impacts for the Revello-Tramonto Residential Project" memorandum prepared by Dudek, dated October 17, 2023, the updated list of cumulative projects does not affect the analysis or conclusions within the previously prepared IS/MND, and all cumulative impacts remain less than significant. As discussed in the MND, the projects identified proximate to the project site consist of remodels of or construction of new single-family dwellings in a Hillside Area zoned and designated for such residential development. Furthermore, new residential development is subject to compliance with building and zoning code regulations already in place. As such, consideration of all projects identified in the MND and the updated list of projects does not change the analysis or conclusions of the previously prepared IS/MND, and all cumulative impacts remain less than significant.



## RECIRCULATION IS NOT REQUIRED

Once an MND has been circulated, it may need to be recirculated for another round of review and comment if it is “substantially revised” after the public notice of the first circulation period has been given. (CEQA Guidelines § 15073.5(a).) A substantial revision includes two situations (CEQA Guidelines § 15073.5(b)):

1. A new, avoidable significant effect is identified, and to reduce that effect to a level of insignificance, mitigation measures or project revisions must be added.
2. The lead agency finds that the mitigation measures or project revisions originally included in the negative declaration will not reduce potentially significant impacts to a level of insignificance, and new mitigation measures or project revisions are required.

Recirculation is required when the addition of new information deprives the public of a meaningful opportunity to comment on substantial adverse project impacts or feasible mitigation measures or alternatives that are not adopted. The purpose of recirculation is to give the public and other agencies an opportunity to evaluate the new data and the validity of conclusions drawn from it. The critical issue in determining whether recirculation is required is whether any new information added to the environment document is substantial.

CEQA Guidelines § 15073.5(c) provides that recirculation is not required under the following circumstances:

1. Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.
2. New project revisions are added in response to written or verbal comments on the project’s effects identified in the proposed negative declaration which are not new avoidable significant effects.
3. Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
4. New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

As discussed above, this Erratum includes: (1) a minor change to the project description to clarify that necessary work in the right-of-way would not have a significant effect and (2) an updated list of projects and cumulative impact analysis. No new significant effects are identified and no new mitigation measures are required.

As is the case here, the addition of new information that clarifies, amplifies, or makes insignificant modifications to an MND does not require recirculation. (CEQA Guidelines § 15073.5(c)(4).) New information will only require recirculation when it amounts to a substantial revision of the MND, as defined above. (CEQA Guidelines § 15073.5(b).) As demonstrated herein, is neither a significant, avoidable impact that requires the addition of mitigation measures nor ineffective mitigation measure requiring revisions.

## CONCLUSION

The information contained in this section clarifies, amplifies, or refines information in the IS/MND but does not make any changes that would meet the definition of “significant new information” as defined above. The information added does not change the IS/MND in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project. As analyzed in the IS/MND, the whole of the record supports the conclusion that the Project would result in impacts below a level of significance.

The City, as lead agency, has reviewed the information in this Erratum and has determined that it does not change any of the basic findings or conclusions of the Draft IS/MND, nor does it constitute “substantial revisions” pursuant to CEQA Guidelines Section 15073.5, or require recirculation of the Draft IS/MND. This Errata, combined with the Draft IS/MND, including technical appendices and reports thereof, comprise the Final IS/MND.

VINCENT P. BERTONI, AICP  
Director of Planning

  
Juliet Oh  
Senior City Planner

### Attachments:

Dudek Memorandum: Updated Cumulative Projects and Impacts for the Revello-Tramonto Residential Project

Location of proposed cross gutter (NavigateLA)

Springhouse Hamilton Park, LLC  
c/o Greg Demos

October 17, 2023

JDR Revello LLC  
c/o Jeff Harrow**Subject: Updated Cumulative Projects and Impacts for the Revello-Tramonto Residential Project**

Dear Mr. Demos and Mr. Harrow,

Dudek has prepared the following updated analysis to reflect changes to the cumulative projects list and analysis for the proposed Revello Drive and Tramonto Drive Residential Project ("Project"). This summary and analysis are supported by the conclusions within the Addendum to the Air Quality and Noise Impact Assessment Report (Addendum Report), dated October 9, 2023, as prepared by Z Consulting Company. The Addendum Report is included as an attachment to this letter.

**Introduction**

The Initial Study (IS) document prepared for the proposed Project evaluates potential environmental effects resulting from construction and operation of the proposed Revello Drive and Tramonto Drive Residential Project ("Project"). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document was prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City concluded that the Project would result in significant impacts on the environment that would be reduced to a less than significant level with mitigation incorporated. The Initial Study and Mitigated Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City. The Draft Initial Study/Mitigated Negative Declaration (IS/MND) was circulated for a 30-day review period beginning on August 19, 2021 and ending on September 20, 2021. Since the time of circulation of the Draft IS/MND, conditions around the Project site, specifically regarding cumulative projects, have changed. As such the following summarizes changes to cumulative projects and any potential new or different cumulative impacts resulting from the revised list of cumulative projects.

**Cumulative Projects**

The Draft IS/MND and accompany Air Quality and Noise Impact Assessment identified 13 cumulative projects that were considered in the cumulative impact analysis for the Project. Since the time of circulation of the Draft IS/MND, conditions around the Project site, specifically regarding cumulative projects, have changed. The following table identifies the list of cumulative projects considered in the Draft IS/MND, the status of each of these projects, and an updated, current list of cumulative projects considered in the Addendum Report:

**Table 1. Cumulative Projects (2020 and 2023)**

2020 Cumulative Projects List	Status	2023 Cumulative Projects List
17321 Tramonto Drive	Inactive	Not Included
17440 Castellammare Drive	Inactive	Not Included
17452 Revello Drive	Ongoing	17452 Revello Drive
17464 Revello Drive	In active	Not Included
17537 Tramonto Drive	Ongoing	17537 Tramonto Drive
17543 Tramonto Drive	Construction Complete	Not Included
17605 Castellammare Drive	Ongoing	17605 Castellammare Drive

17616 Posetano Road	Inactive	Not Included
17639 Revello Drive	Ongoing	17639 Revello Drive
17642 Tramonto Drive	Ongoing	17642 Tramonto Drive
17708 Tramonto Drive	Ongoing	17708 Tramonto Drive
17800 Tramonto Drive	Inactive	Not Included
204 Coperto Drive	Construction Complete	Not Included
	NEW	17480 Revello Drive
	NEW	17488 Revello Drive
	NEW	17501 Posetano Road
	NEW	17502 Revello Drive
	NEW	17504 Castellammare Drive
	NEW	17520 Revello Drive
	NEW	17534 Posetano Road
	NEW	17622 Posetano Road

As such, of the original 13 cumulative projects, six are carried forward in the updated cumulative analysis, and an additional eight new cumulative projects are added. The updated cumulative analysis, therefore, considers a total of 14 total cumulative projects.

### Updated Cumulative Analysis

#### *Air Quality*

As discussed in the attached Addendum Report, based on information from the City of Los Angeles, a total of 14 construction projects are currently active or in the permitting pipeline within 1,000 feet of the Project site. As shown in Table 9 in the Addendum Report, assuming either five projects under construction at the same time in a 3.5-acre area or seven projects under construction at the same time in a 5-acre area, cumulative air quality impacts would remain below the established significance thresholds for all criteria pollutants, and impacts would be **less than significant**.

#### *Regional Criteria Pollutants*

Regional impacts are cumulative impacts by their nature. The regional significance thresholds were selected to ensure that a project does not disproportionately impact the cumulative air quality of the air basin. If a project has less than significant impacts for regional criteria pollutants, its cumulative impacts on a regional basis are also less than significant. As such, regional criteria pollutants impacts would be **less than significant**.

#### *Greenhouse Gas Emissions*

GHG impacts are global in their effects. For the same reason as the regional criteria pollutant impacts, if a project has a less than significant GHG emissions impact based on the SCAQMD's thresholds, it also has less-than-significant cumulative GHG impacts. As such, GHG impacts would be **less than significant**.

#### *Noise*

The noise significance threshold utilized in this Assessment is applied to each piece of equipment individually, so it cannot be utilized to determine the cumulative impacts of multiple projects. Instead, the physics of sound will be utilized to show that the Project will generate less than significant cumulative noise impacts. Any substantial material (buildings, terrain, walls, etc.) that breaks line-of-sight between a noise source and the receptor will reduce the noise level experienced by that receptor by at least 10 dBA. Because a large amount of shielding exists in the area due to the extreme elevation variations and the limited line of sight to nearby projects, this Project is not expected to cause or contribute to any significant cumulative noise impacts. Therefore, this Project has **less than significant cumulative noise impacts**.



## Conclusion

Tor the reasons discussed above, the IS/MND prepared for the Project is appropriate. The updated list of cumulative projects does not affect the analysis or conclusions within the previously prepared IS/MND, and all cumulative impacts remain less than significant.

If you have any questions or would like to further discuss the cumulative impacts analysis, please do not hesitate to contact me via email at [ncobleigh@dudek.com](mailto:ncobleigh@dudek.com) or at 626.204.9829. Thank you.

Sincerely,

Nicole Cobleigh  
Senior Project Manager

# Attachment

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## Addendum to the Air Quality and Noise Impact Assessment

October 9, 2023



**CONSULTING COMPANY**

— ENVIRONMENTAL & SAFETY —

## **ADDENDUM TO THE AIR QUALITY AND NOISE IMPACT ASSESSMENT**

### **Tramonto Revello Project**

17538, 17544 and 17550 Tramonto Drive  
17532, 17540 and 17548 Revello Drive  
17523 and 17529 Revello Drive  
17533, 17537, 17541 and 17547 Revello Drive  
Pacific Palisades, CA 90272

October 9, 2023

Prepared for: JDR Revello, LLC and  
Springhouse Hamilton Park, LLC

Prepared by:

---

Garrett Zuleger, P.E.  
Z Consulting Company  
garrett@zconco.com  
805-750-7356

# **ADDENDUM TO THE AIR QUALITY AND NOISE IMPACT ASSESSMENT**

Tramonto Revello Project

October 9, 2023

This Addendum to the Air Quality and Noise Impact Assessment (Addendum) has been prepared to update the cumulative impacts analysis presented in the original Air Quality and Noise Impact Assessment (Assessment, dated August 6, 2020) to incorporate the current list of nearby construction projects either in active construction or in Los Angeles City's permitting pipeline.

This project includes the construction of four (4) single family residences (SFR) located at the following addresses in the Pacific Palisades (Project):

- 17538, 17544 and 17550 Tramonto Drive (SFR 1)
- 17532, 17540 and 17548 Revello Drive (SFR 2)
- 17523 and 17529 Revello Drive (SFR 3)
- 17533, 17537, 17541 and 17547 Revello Drive (SFR 4)

Please note that cumulative impacts remain less than significant with the updated list of nearby construction projects.

This Addendum includes an updated Section 5.0 of the Assessment, as well as an updated Figure 1.



## SECTION 5 CUMULATIVE IMPACTS (UPDATED)

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This section addresses the potential for cumulative impacts occurring from the simultaneous construction of multiple projects in this area. Cumulative impacts are considered for each of the four impact classifications included in Section 4.

Based on information from Los Angeles City, there are a total of fourteen construction projects currently active or in the permitting pipeline within 1,000 feet of the Project. The location of these projects is shown on Figure 1.

### 5.1 Air Quality Impacts (Updated)

Cumulative air quality impacts are addressed in this section.

#### 5.1.1 Localized Criteria Pollutant Impacts (Updated)

By grouping nearby projects together and treating them as one larger construction project, the same method for analyzing localized criteria pollutant impacts presented in Section 4.1.1 can be used to determine the significance of cumulative localized criteria pollutant impacts. The following two pieces of information are required to do this:

- **The total emissions from the group of projects.** The nearest construction projects are all significantly smaller than the Project because they are individual houses whereas the Project includes the construction of four separate houses. As size is the primary factor that influences the amount of emissions a project generates during construction, it is conservative to assume that, on average, each of the nearby projects will produce the same amount of emissions as the Project.
- **The appropriate significance threshold.** According to SCAQMD guidelines, the significance thresholds for localized emissions impacts are based on the size of the project (e.g., the PM<sub>2.5</sub> threshold is 3.0 lbs/day for a 1-acre project, 4.0 lbs/day for a 2-acre project, and 6 lbs/day for a 5-acre project). Therefore, cumulative localized emissions impacts from multiple projects should be compared to the appropriate significance threshold for the collective size of the considered Projects.

Two (2) different groupings of projects were considered for this cumulative localized criteria pollutant analysis:

- **Cumulative Scenario 1** – Five (5) projects are under construction at the same time in a 3.5-acre area, including the Project. This 2.5-acre area is shown in yellow on Figure 1.
- **Cumulative Scenario 2** – Seven (7) projects are under construction at the same time in a five-acre area, including the Project. This 5-acre area is shown in green on Figure 1.

Table 9 presents the cumulative localized criteria pollutant emissions impacts associated with these two scenarios. The maximum emissions are used for each pollutant, regardless of construction phase.

**Table 9 Cumulative Localized Criteria Pollutant Emissions Impacts (lbs/day)**

Scenario	Parameter	CO	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>
Cumulative Scenario 1 – 5 projects in 3.5 acres	Cumulative Emissions	84.0	85.2	8.1	3.5
	Significance Threshold	1,179	184	9.5	5.0
	Significant?	No	No	No	No
Cumulative Scenario 2 – 7 projects in 5 acres	Cumulative Emissions	117.7	119.3	11.3	4.9
	Significance Threshold	1,531	221	13.0	6.0
	Significant?	No	No	No	No

The results in Table 9 demonstrate that the Project does not cause or contribute to a cumulative exceedance of the localized criteria pollutant significance thresholds. Additionally, please note that this analysis presents a conservative maximum representation of cumulative emissions because it assumes that all the nearby projects are the same size as the Project (whereas they are actually much smaller) and that they will all be in the most polluting phase of construction simultaneously.

### 5.1.2 Regional Criteria Pollutant Impacts (Updated)

Regional impacts are cumulative impacts by their nature. The regional significance thresholds were selected to ensure that a project does not disproportionately impact the cumulative air quality of the air basin. If a project has less than significant impacts for regional criteria pollutants, its cumulative impacts on a regional basis are also less than significant.

### 5.1.3 Greenhouse Gas Impacts (Updated)

GHG impacts are global in their effects. For the same reason as the regional criteria pollutant impacts, if a project has a less than significant GHG emissions impact based on the SCAQMD's thresholds, it also has less-than-significant cumulative GHG impacts.

## 5.2 Noise Impacts (Updated)

This section discusses the potential for cumulative noise impacts from the Project. The noise significance threshold utilized in this Assessment is applied to each piece of equipment individually, so it cannot be utilized to determine the cumulative impacts of multiple projects. Instead, the physics of sound will be utilized to show that the Project will generate less than significant cumulative noise impacts.

Noise is measured and experienced on a logarithmic scale. This causes some unexpected properties, such as the following rule of thumb: if two simultaneous noises have volumes at least 10 dBA apart, the louder noise will entirely drown out the lower volume noise. Stated another way, if you add a 50-dBA noise to a 60-dBA noise, the resulting noise level remains 60 dBA.

Any substantial material (buildings, terrain, walls, etc.) that breaks line-of-site between a noise source and the receptor will reduce the noise level experienced by that receptor by at least 10 dBA. Because a large amount of shielding exists in the area due to the extreme elevation variations and the limited line of site to nearby projects, this Project is not expected to cause or contribute to any significant cumulative noise impacts. Therefore, this Project has less than significant cumulative noise impacts.

## **APPENDIX A - FIGURES**

Figure 1 – Site Location Map (Updated)







