



Northwest San Pedro Neighborhood Council

"Your Community Voice"

August 22, 2015

Department of the Navy
Naval Facilities Engineering Command Southwest
Attn: Code JE20.TB
1220 Pacific Highway
San Diego, CA

Ray Regalado
President

Laurie Jacobs
Vice President

Sarah Valdez
Treasurer

Cynthia Gonyea
Secretary

RE: Comments on Draft Environmental Assessment for the Complete or Partial Closure of DFSP San Pedro

Thank you for the opportunity to comment on the draft Environmental Assessment (EA) for the DFSP property. The Northwest San Pedro Neighborhood Council, one of 95 certified Neighborhood Councils in the City of Los Angeles, represents approximately 20,000 stakeholders living adjacent to the DFSP. We are disappointed that in spite of requests by a number of organizations for a longer review time for the Draft Environmental Assessment (EA), no additional time was provided. Unfortunately the short review time, did not allow sufficient notice for this item to be heard by our full Board, however our Planning and Land Use Committee was able to review it at a public meeting and adopted the following comments:

This property is very important to our community as it is between two major entryways to San Pedro, Gaffey and Western Avenue. It provides important habitat for both the Gnatcatcher and the Palos Verdes Blue Butterfly, for which the Navy has been providing good protection.

While the future uses of this property were not a part of this study, as soon as possible the community would like to again raise the possibility of a road through the property connecting the Ponte Vista development to either Gaffey and/or Palos Verdes Drive North.

During the development of the Ponte Vista EIR and in the comments on the DEIR, there was extensive discussion of the possibility of putting in a road to Ponte Vista from Gaffey St. along the southern edge of the DFSP site. While noting that there would be emergency vehicle access on the road there, the military said that regular access would not be permitted due to national security concerns.

Now that fuel is no longer stored there, national security should not be a concern. Will the road be accessible for vehicle access to and from Gaffey Street and Ponte Vista? Is

the proponent obligated to discuss the growth-inducing impacts of the closure on the road access? We believe it is a likely impact that must be discussed in an EA.

In general, we are supportive of the demolition of the above ground tanks and pipelines and filling of the underground tanks and pipelines. We do not support Option 3 which includes removal of the underground tanks and which, as discussed in the EA, would have significant environmental impacts.

We are concerned about the lack of maintenance of the trees along Gaffey in the southern portion of the property which were planted by Homeowners United and until recently were maintained by our Neighborhood Council. About two or three years ago we were notified that we could no longer go on the property to maintain the trees. With the partial or full closure of the base the question arises of who will maintain the trees. We would appreciate a direct answer to this question.

General Comments

1. The EA states that utilities for ball fields and the pistol range will not be impacted under Alternatives 1, 2, & 4 however there is no mention of the utilities under Alternative 3; this needs to be clarified.
2. We request that an opportunity be provided for public input into the details of anticipated plans such as the haul routes and the replanting plan.

Comments on areas not studied

Socio-Economics – We request that a local hiring requirement be added for civilian contractors for demolition and/or repair/resumption of operation activities. This would have a beneficial socioeconomic impact and well as a positive environmental justice impact.

Protection of Children – The section should be amended to include the VOA housing, 73 units of former military housing that will house women veterans and their children. This property is located along USS Missouri and USS Princeton along the North side of the DFSP. The impact and mitigation measures of potential airborne pathogens, noise, dust, and equipment emissions on children should be addressed in the final EA.

Biological Resources

1. Particular attention needs to be paid to the PV Blue Butterfly habitat, particularly in light of the fact that none were found in either the 2014 or 2015 surveys. Because, as stated in the EA, reestablishment of their habitat takes three to four years, and reestablishment cannot start while the land is disturbed, it could potentially take 8 years for the habitat to be reestablished. The DFSP should **immediately** plant an equivalent area of habitat in an area where no soil disturbance is planned.

2. Revegetation provides a unique opportunity to increase habitat for PV Blue Butterfly, Gnatcatcher, and migratory birds. The planting restoration plan should require a significant increase in habitat as well as an overall increase in the ratio of native to non-native plants.
3. Coyotes and Rodents are both identified as being present on the property. The impact of the various alternatives on these populations should be discussed. Of particular concern to us is the impact on the surrounding residential areas. When grading began at the adjoining Ponte Vista property, we experienced an increase in both of these populations in our neighborhoods. Mitigation measures should be included to reduce that migration.
4. The discussion indicates that no Bald and Golden Eagles were found. While that may have been true, the *Daily Breeze* has documented sightings of at least one bald eagle in that vicinity. Rabbits, snakes and other small animals provide food for the hawks and eagles. These resources should be addressed in the EA.
5. A number of trees are identified on the property yet we did not find any specific mention as to what will happen to them. Language should be added to indicate that, to the extent possible, all trees should be preserved in place. If that is not possible, trees should be boxed, saved, replanted, and monitored to ensure their survival. Any trees not surviving replanting should be replaced at a ratio of 2:1.

6. Appendix B – Mitigation Measures

a. B-13 should be amended to require the approval and monitoring of a watering schedule that will provide sufficient water for rapid habitat restoration

Rationale: Drought conditions may adversely impact habitat restoration. At the same time watering should be suspended during times of adequate rain.

b. B-14 should be amended to strike the words “up to” and add an inspection after 6 months and then again at one year following completion of the project.

Rationale: If the re-seeding/re-planting, weed control, watering, and/or erosion control are not sufficient, this should be evident and addressed at the 6-month mark.

c. B-15.b should be amended to require eradication and elimination at least every six months (rather than annually)

d. B-15.c should be amended to include the time frame for required elimination

e. B15.e.i should be amended to increase the ratio of non-native plant to native plant cover from 1:1 to 1:2

Water Resources

Though the Navy Department offers a range of options for closing DFSP San Pedro it concludes that whatever one it may choose “[it] would not have a significant impact to water resources.” (pp 3-61 to 3-62). That may be a bit optimistic.

1. Runoff. The Navy's assessment does recognize that proposed demolition and remediation may impact runoff and acknowledges that more demolition and remediation will involve more soil disturbance and in turn will increase the likelihood of runoff. (p. 3-60). It fails to mention, however, another aspect of runoff-related problems -- time. The more work performed on the property, the longer the process is likely to take and, therefore, the greater the chances are that the job will extend into additional rainy seasons. Option 3, for example, is expected to take 4 years – one full year more (and at least one rainy season more) than Options 2 or 4. (Table 2-1). What is more, as the work period grows longer, chances increase that at least one of the rainy seasons will bring significant storms that will generate enough runoff to cause damage. In fact, prior year's storms have resulted in significant runoff and clogging of storm drains at the southern portion of the property along Gaffey, this without any disturbance to the soil.

Please consider developing a runoff recapture/reuse program to recycle water on-site.

Mitigation W-1.a should be amended to strengthen the requirements for erosion control.

2. Dust Control/Water Use. The assessment fails to address the amount of water that will be used to control dust during the proposed work. Dust control measures are usually implemented at any large-scale demolition project and typically involve obtaining water from a public source, such as a fire hydrant (i.e., the water is potable), and spraying it over the construction site. The more demolition performed, the more spraying, and the more potable water will be used. The assessment's authors estimate that 93 acres will be affected under Option 3, whereas only 25 acres and 16 acres will be impacted under Options 1 and 2, respectively. (Table ES-2, p. ES-5). Unfortunately, those authors provide no estimates of how much water it takes to control dust on one acre over the course of one year. (Approximately 326,000 gallons of water are needed to cover just one acre to a depth of one foot.) Also, the more extensive the demolition, the more likely the work will last into an additional dry season and necessitate spraying for another year.

A mitigation measure should be added to require the use of non-potable water for dust control.

Transportation

Clarification is needed on the proposed haul routes and we respectfully request that community members have the opportunity to comment on the proposed routes.

Cumulative Impacts

1. Section 4.2, second paragraph should be amended to
 - a. Add the expansion of Marymount College as an additional cumulative project. Marymount College is located to the North of the project area on Palos Verdes Drive North, on former military property.
 - b. Change the third sentence to read "...and then construct up to 700 new homes." This is the number actually approved by the City of Los Angeles (Ponte Vista Specific Plan page 13).
 - c. Edit the next to the last sentence to indicate that Ponte Vista is still working on obtaining a grading permit from the City of Los Angeles. As discussed in the Draft EIR for Ponte Vista (page IV.N-160) the Project will be constructed in stages for market absorption over approximately five-years.
2. Section 4.4.1, Biological Resources, acknowledges that "the Proposed Action's impact on even small amounts of habitat (most particularly PVB) [are] potentially significant when added to the aggregate effects of these past actions."

The second paragraph of this section should be amended to discuss the cumulative impacts on the biological resources of the recent removal of ALL biological resources from the Ponte Vista site including Gnatcatcher and PV Blue habitat and the stream and trees that abutted the southwest corner of the study area.
3. Section 4.4, Transportation, should be amended to delete the statement that "It is possible for construction of Ponte Vista to be winding down, as demolition/repair of DFSP San Pedro would be ramping up....no substantial change in LOS would occur." This statement is very misleading since Ponte Vista has not yet received a grading permit from the City of Los Angeles. They initially requested a 15-year development agreement from the City and have indicated that they plan to phase in the project over at least five years.

Should you have any questions or want further clarification of any of these items, please feel free to contact Diana Nave, Chair, NWSPNC Planning and Land Use Committee.

Ray Regalado
President, NWSPNC