



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

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November 29, 2017

OurLA2040

Department of City Planning,
Citywide Policy Planning Division
200 N. Spring Street
Room 278
Los Angeles, CA 90012

Re: Comments to LA General Plan (Our LA2040) from Coastal San Pedro Neighborhood Council

Open Space

Parks are an investment in aesthetics and better health—people living near parks exercise more, experience less stress, and enjoy better health than those living further away from parks. Parks also increase property values, benefiting residents and local government revenues. Unfortunately, LA ranks 74th among the country's 100 largest cities in the Trust for Public Lands' Parkscore index assessing acreage, accessibility, park amenities, and related concerns. We need more parks, given that only 55% of city residents live within ½ mile walking distance of a park (bearing in mind that a single park--Griffith Park, over 20 miles from San Pedro--makes up 11% of the city's total park land); and we need better maintenance of parks--LA gets only a 9 out of 20 Parkscore rating for park spending per resident.

We are particularly concerned with what OurLA2040 planners refer to as wildlands. We have at least three threatened or endangered species in San Pedro. Coastal Southern California was once a major biodiversity hot spot, but we've destroyed most of the original native habitat. To make matters worse, instead of restoring native habitat where possible, we've instead introduced non-native species that further degrade local habitat. LA County has designated a number of Significant Ecological Areas (SEAs), and some areas in San Pedro (e.g., White Point) have been proposed for inclusion, but so far have not been formally designated as SEAs. As some of the last surviving areas of Coastal Sage Scrub habitat in the county, these areas merit preservation, and restoration with locally-sourced native species. Since many of them adjoin or are near SEAs in the neighboring city of Rancho Palos Verdes, their potential SEA value is enhanced.

San Pedro has many relict patches of open space—including coastal bluffs, Sunken City, parts of Angels Gate Park and Bogdanovich/Friendship Park, stretches of Miraleste Canyon and other streams, parts of Peck Park/Hernandez Ranch, the DFSP fuel depot property between North Gaffey St. and Western Avenue, etc.—that could be preserved and restored as viable native habitat.

In a similar vein, truly native plants—native to San Pedro and other Los Angeles localities, not just native to somewhere in North America or

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somewhere in California—should be given priority in landscaping for parks and other public spaces. The City Arborist should accelerate approval of native species for use as street trees, shrubs, grasses, and herbs. Native plants, which have been adapting to local climate, soil, and other ecological conditions for thousands of years, are more efficient at harnessing and recycling local resources—soil moisture and nutrients, etc.—than introduced species. Crucially, native plants have far greater value to native fauna—as forage, habitat, etc.—than exotic species. By the same token, Native fauna are better adapted to local conditions and natural resources than non-native animals, and are likely to serve more effectively as pollinators and in other symbiotic roles.

San Pedro's coastline, outside of the Cabrillo breakwater, has been designated as a Coastal Resource Area (CRA) by the same county agency that identifies SEAs. We need to protect these areas and enforce regulations affecting the environmental quality of coastal habitat, including tidepools and coastal bluffs.

Inner Cabrillo Beach is chronically graded as unhealthy, despite prior efforts to remedy the situation, since the artificial breakwater prevents natural current circulation. The City or the Port needs to implement effective strategies to address water quality at Inner Cabrillo Beach, which is used by many thousands of visitors.

Open space and recreational opportunities should be commensurate with the well researched ratios the population of a given area needs to maintain good physical, mental, and emotional health;

Open spaces should be developed within easy reach of all neighborhoods, both residential and commercial throughout the City and not just "clustered in the scenic areas";

The assets required for maintenance and preferred usage must be consistently budgeted by the City and/or through public/private partnerships.

The fact that one of the most successful parks in San Pedro (i.e. the White Point Nature Preserve) as well as many discreet Park activities have only been able to reach that success through public/private partnerships should be noted, but that should not be the default position of the City for maintaining its parks or for adding the needed open space essential to a healthy population.

Open space such as Sunken City in the Point Fermin area, that cannot be "legally" accessed, should not be included in the City's open space calculations. Sunken City has been closed to the public since 1988 and will remain closed until funds are identified and become available to do the clean-up, reconstruction, and signage required for public use.

The priority use consideration for public lands should be public use and full public access, above consideration for leasing to private, commercial or public-access-limited uses. In the San Pedro area, specifically, State Tidelands Trust lands, such as the Cabrillo Beach Youth Facility, should be targeted for public use, not private or non-publicly-available uses.

Element/Environment, Chapter/Environmental Management

Implement policies requiring or promoting the following:

- Leadership in Energy and Environmental Design (LEED building) certification for new construction and renovations;
- Transition of businesses and residences to renewable energy production and storage;



- Transition of commercial transport operators to renewable fuels for transportation vehicles;
- Advocating for regulators such as California Air Resources Board for the adoption of rules that would reduce toxic air emissions and greenhouse gases;
- Policy and awareness campaign for Reduce, Reuse, Recycle of all waste and transition to zero-waste;
- Termination of single-use plastic containers in water and food packaging;
- Imposition of significant deposit incentive applicable to plastic food packaging to encourage re-use;
- City agencies and offices attainment of International Standards Organization (ISO) 14001 Certification for Environmental Management System; and
- Establishment of Advisory boards composed of representatives from industry, regulatory agencies, and communities affected by the Port of Los Angeles and Los Angeles International Airport to help define and implement environmental policies.

Element/Environment, Chapter/Water

Implement policies requiring or promoting the following:

- Commercial and residential landscaping with drought-resistant native plants;
- Elimination of commercial and residential use of water for rinsing walkways, driveways, and hardscape;
- Commercial and residential rainwater collection;
- Increased phase-in of storm-water runoff collection from capture systems and physical (non-chemical) treatment strategies; and,
- Termination of single-use plastic containers in water and food packaging.

Element/Environment, Chapter/Energy

Implement policies requiring or promoting the following:

- Leadership in Energy and Environmental Design (LEED building) certification for new construction and renovations;
- Transition of businesses and residences to renewable energy production and storage; and,



- City agencies and offices attainment of International Standards Organization (ISO) 14001 Certification for Environmental Management System.

Element/Environment, Chapter/Urban Forest

Implement policies requiring or promoting the following:

- Commercial and residential landscaping with drought-resistant native plants;
- Informational campaign to ensure City employees and public understand requirement for deep watering vs shallow irrigation (applicable to trees with deep or tap roots);
- Increase scope and reach of tree planting initiatives;
- Informational campaign to ensure public is aware of tree planting initiatives; and
- Accelerate approval of native plants for landscaping.

Element/Economy, Chapter/Jobs and Industries

Implement policies requiring or promoting the following:

- Identification of skills and professions required to support evolving Los Angeles area economy; and,
- Increase public awareness of the skills and professions that are required in the evolving Los Angeles area economy.

Element/Economy, Chapter/Trade and Logistics

Implement policies requiring or promoting the following:

- Identification of skills and professions required to support the increased automation of goods transport;
- Policies to ensure trades and unions are included in the increased automation of goods transport; and,
- Collaborative programs to ensure the training of persons for the increased automation of goods transport.



Element/Economy, Chapter/Economic Development

Implement policies requiring or promoting the following:

- Transition of portions of City managed resources to higher technology support and manufacturing and the conversion of such facilities to support advancing technology and economic development, such as Alta Sea at the Port of Los Angeles.

Element/Economy, Chapter/Innovation and Technology

Implement policies requiring or promoting the following:

- Leadership in Energy and Environmental Design (LEED building) certification for new construction and renovations;
- Conversion of City of Los Angeles automotive fleets and buildings to renewable energy;
- Establishment of Advisory boards composed of representatives from academia, industry, regulators, and communities to identify opportunities and implement policies promoting innovation; and
- Investment and support of business incubators.

Thank you for the opportunity to submit these comments.



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These comments were approved by the CSPNC Board at the November 20, 2017 meeting.